IN THE CIRCUIT COURT OF Saint Louis County, MISSOURI
(County where court is located. City of Saint Louis is considered a county.)

FILED
JUL 21 2023
JOAN M. GILMER
CIRCUIT CLERK, ST LOUIS COUNTY

Justin (First Name) Duane (Middle Name) Wach (Last Name) ____ (Jr./Sr./III)
Petitioner, *(Enter full legal name of the person who filed the original petition)*

v.

Alexandra (First Name) Marie (Middle Name) Dean (Last Name) ____ (Jr./Sr./III)
Respondent. *(Enter full legal name of the person who responded to the original petition)*

Case Number 21SL-DR00305-01
(Enter the case number of the judgment you want to change)

Division Number ~~15~~ 38

Motion to Modify Child Custody and Support

A parent may use this form to ask the court to change a custody or visitation order. A parent may also ask the court to change child support because a change in custody or visitation may impact the financial circumstances of the parents.

You must prepare Part A of the *Parenting Plan* along with this *Motion to Modify Child Custody and Support*. You must also prepare Part B of the *Parenting Plan* if you want the court to consider a change to the child support order. Your proposed *Parenting Plan* must be filed within 30 days of the filing of this *Motion*.

1. Did you file the original petition in this matter? *(Check one of the two boxes)*
   - [x] Yes, I did. (I am Petitioner/Plaintiff)
   - [ ] No, the other parent did. (I am Respondent/Defendant)

2. What is the date of the last custody judgment? 06 / 30 / 2023 (mm/dd/yyyy)

3. What type of judgment is it? *(Check one of the five boxes)*
   - [ ] A dissolution judgment
   - [ ] A paternity judgment
   - [x] A modification of a dissolution judgment
   - [ ] A modification of a paternity judgment
   - [ ] A child custody and support judgment

4. List the children included in the last custody judgment:

	(First Name)	(Middle Name)	(Last Name)	(Jr./Sr./III)	(Child's Age)
a.	Sparrow	Justice	Wach		6
b.	Conscious	Ariyah	Wach		4
c.					

This form is available for free at www.selfrepresent.mo.gov

d. _____ _____ _____ _____ _____
(First Name) (Middle Name) (Last Name) (Jr./Sr./III) (Child's Age)

e. _____ _____ _____ _____ _____
(First Name) (Middle Name) (Last Name) (Jr./Sr./III) (Child's Age)

f. _____ _____ _____ _____ _____
(First Name) (Middle Name) (Last Name) (Jr./Sr./III) (Child's Age)

5. Who was ordered to pay child support? *(Check one of the four boxes)*
   - [x] I was ordered to pay child support.
   - [x] The other parent was ordered to pay child support.
   - [ ] Neither parent was ordered to pay child support.
   - [ ] The judgment did not mention child support.

6. Why are you asking this court for a change of custody and/or visitation with your child(ren)?

   Within 30 days of the filing of this *Motion*, you must also file a proposed *Parenting Plan* that includes the changes you would like the court to consider.

   • Location of visitation venue is approximately 101.4 miles from where I reside.
   • I'd like for more than 1-hour visits / overnight visits be considered.
   • Request for visits to be supervised by wife and/or mother (Betty Jeane Hansmann).

7. What circumstances have changed since this court entered its last custody judgment?

   • Stable and consistent living situation for 1.5 years / held full-time job.
   • Sobriety / Cooperation with court-ordered drug test (appointment scheduled)

8. If you are asking for a change in child support, what circumstances have changed since this court entered its last child support judgment?

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Your Information

Justin (First Name) Duane (Middle Name) Wach (Last Name) ____ (Jr./Sr./III)
(Enter your full legal name on the lines above)

9. What is your mailing address?
The address you provide is the address at which you will receive all mail from the court and the other parent regarding this case. If you move during the time this case is pending, you must send a letter to the court notifying it of your new address. This address is not necessarily the same as the address at which you live. If you do not wish to give the address at which you live, you **must** still give the court and the other parent a mailing address. Because court actions are a matter of public record, the address you list will be available to the public.

114 S. Rolla Street
(Street)

Rolla (City) MO (State) 65401 (Zip)

(314) 437 - 4492 (Telephone Number with Area Code) justinwach@icloud.com (E-mail Address Optional)

10. What are the last four numbers of your social security number?
XXX-XX- 8564

11. Are you over the age of eighteen? *(Check one of the two boxes)*
☒ Yes ☐ No

12. I live in ☒ the United States ☐ another country, which is ____.

13. I live in ☒ Missouri ☐ another state, which is ____.

14. I live in the county of Phelps.
City of Saint Louis is considered a county. If you live in the city of Saint Louis, you should write "Saint Louis city" in the blank.

15. What is your current employment status? *(Check one of the three boxes)*
☒ Employed ☐ Unemployed ☐ Self-employed

16. If you are employed or self-employed, where do you currently work?
If you are self-employed, enter a brief description of the type of work you perform such as "Landscaping" or "Day care" on the line for the name of your employer. If you are self-employed, you should also enter the address information for your self-employment.

Ronald Bell — Scruff's Grill
(Employer's name or type of self-employment)

1732 North Bishop Ave Suite #3
(Street)

Rolla (City) MO (State) 65401 (Zip)

Information about the Other Parent

Alexandra Marie Dean _____
(First Name) (Middle Name) (Last Name) (Jr./Sr./III)
(Enter the full legal name of the other parent on the lines above)

17. What is the other parent's mailing address?
This is the address that the court will use to send information about your case to the other parent. If you do not know the other parent's current address, you should enter their last known address.

7616 Virginia Avenue
(Street)

St. Louis MO 63111
(City) (State) (Zip)

(314) 323 8267 Sparrowconscious1719@gmail.com
(Telephone Number with Area Code) (E-mail Address - Optional)

18. What are the last four numbers of the other parent's social security number?
Do not leave this answer blank. If you do not know the other parent's social security number, enter "Unknown" in this answer.

XXX-XX- unknown

19. Is the other parent over the age of eighteen? *(Check one of the two boxes)*
☒ Yes ☐ No

20. The other parent lives in ☒ the United States ☐ another country, which is _____.

21. The other parent lives in ☒ Missouri ☐ another state, which is _____.

22. The other parent lives in the county of St. Louis.
City of Saint Louis is considered a county. If Respondent lives in the city of Saint Louis, you should write "Saint Louis city" in the blank.

23. The other parent is currently ☐ employed ☐ unemployed ☐ self-employed ☒ employment unknown. *(Check one of the four boxes)*

24. If the other parent is employed or self-employed, where do they currently work?
If the other parent is self-employed, enter a brief description of the type of work they perform, such as "Landscaping" or "Day care," on the line for the name of the employer. If the other parent is self-employed you should also enter the address information for their self-employment.

_____
(Employer's name or type of self-employment)

_____
(Street)

_____ _____ _____
(City) *(State)* *(Zip)*

25. The other parent ☐ is ☒ is **not** on active duty in the military. *(Check "is" or "is not")*
If the other parent is on active duty in the armed forces of the United States, the Servicemembers Civil Relief Act (SCRA) may prevent you from getting a judgment without the other parent's consent. You should contact a lawyer about this situation prior to filing this *Motion*.

Information about the Children

26. Child(ren)'s Residences: List the name of the parent or guardian with whom the children have lived and the address where any of the children have lived during the past five years. Enter the dates at each address. If the child(ren) have lived at more than three addresses in the past five years, attach an additional page to this *Motion* listing the information requested in question 26 for each additional address.

(1) Sparrow (First Name) Justice (Middle Name) Wach (Last Name) (Jr./Sr./III)

1035 White Hawk Lane (Street)

Cuba (City) Mo (State) 65453 (Zip) (Dates)

(2) Conscious (First Name) Ariyah (Middle Name) Wach (Last Name) (Jr./Sr./III)

1035 White Hawk Lane (Street)

Cuba (City) Mo (State) 65453 (Zip) (Dates)

(3) (First Name) (Middle Name) (Last Name) (Jr./Sr./III)

(Street)

(City) (State) (Zip) (Dates)

27. Do you know of anyone other than you or the other parent who has physical custody of any of the children or claims to have custody or visitation rights with respect to any of the children? *(Check one of the two boxes)*

☒ Yes ☐ No

28. Do you have information about any other custody proceeding concerning any of the children pending in a court of this or any other state? *(Check one of the two boxes)*

☐ Yes ☒ No

29. Have you participated in other litigation concerning the custody of any of the children in this or any other state? *(Check one of the two boxes)*

☐ Yes ☒ No

30. Have any of the children been a victim of abuse or neglect? *(Check one of the two boxes)*

☒ Yes ☐ No

31. If you answered "Yes" to questions 27, 28, 29 or 30, please explain.

The children were removed from their natural mother due to abuse and neglect.

32. Do any of the children listed in this *Motion* currently receive Temporary Assistance for Needy Families (TANF) benefits through the Family Support Division, or have they received TANF benefits in the past? *(Check one of the two boxes)*

☐ Yes ☒ No

If yes, you must serve the Family Support Division with a copy of your *Motion to Modify Child Custody and Support* and other forms filed with this *Motion.* Instructions on how to serve the Family Support Division are listed on page 8 of this *Motion.*

Request for Relief

I want the court to do the following: *(Check all that apply)*

☐ Change legal custody as described in Part A of the *Parenting Plan* filed with this *Motion.*

☐ Change physical custody as described in Part A of the *Parenting Plan* filed with this *Motion.*

☒ Change the visitation schedule as described in Part A of the *Parenting Plan* filed with this *Motion.*

☐ Change child support as described in Part B of the *Parenting Plan* filed with this *Motion.*

☒ Other (Describe the new proposed orders on the lines below and list the page(s) of the *Parenting Plan* where the new proposed orders are contained.

• Modify location of visitation venue due to distance/work schedule

• Modify plan to phase into overnight and unsupervised visits as seen fit.

• Modify persons supervising visits

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Directions for Service on the Other Parent *(Enter the name of the other parent on the lines below)*

Alexandra Marie Dean
(First Name) *(Middle Name)* *(Last Name)* *(Jr./Sr./III)*

If you do not know the location of the other parent and you have no way of contacting them, you must attempt to serve them at their last known address or place of employment. Once you make an honest and reasonable effort to personally serve them and are still unable to get service, then you may file a *Request for Service by Publication* asking the court to publish notice of your *Motion* in the local newspaper. The *Request for Service by Publication* is available on the Representing Yourself website at selfrepresent.mo.gov. **If you have service by publication, you are not entitled to obtain any kind of money judgment including child support. This option should only be used as a last resort.**

Check one of the following service options:

☐ The other parent has signed a verified *Answer to Motion to Modify Child Custody and Support* which is being filed with the *Motion to Modify Child Custody and Support.* Therefore, do not issue a summons.

If you check this box, you must file the *Answer to Motion to Modify Child Custody and Support* at the same time you file this *Motion*. The *Answer* must be signed by the other parent in front of a notary public.

☐ The other parent should be served with a summons at their home:

The other parent must be served within 30 days of the issuance of the summons. **If you are going to have the other parent served, you must file another copy of all your documents in this case to be served on the other parent.**

_____
(Street)

_____ _____ _____
(City) *(State)* *(Zip)*

☐ The other parent should be served with a summons at their place of employment:

The other parent must be served within 30 days of the issuance of the summons. **If you are going to have the other parent served, you must file another copy of all your documents in this case to be served on the other parent.**

_____ _____
(Employer's Name) *(Hours of Employment)*

_____
(Street)

_____ _____ _____
(City) *(State)* *(Zip)*

☐ The other parent cannot be served in Missouri. Therefore, service by registered mail is requested. A copy of the *Affidavit for Service by Mail* is attached to this form. See Missouri Supreme Court Rule 54.12(b).

If you request a summons to be served outside of the county where you filed this *Motion*, the court may require you to deliver the summons to the sheriff of the county where the summons will be served. You must also pay the appropriate service fee to that sheriff. For further instructions, please contact the circuit clerk in the county where your *Motion* is filed.

Service on Family Support Division (if necessary)

If any of the children listed in this *Motion* receive or have received Temporary Assistance for Needy Families (TANF) benefits, you must serve the Family Support Division with a copy of your *Motion* and *Parenting Plan*.

☐ The child(ren) receive, or have received in the past, TANF benefits through the Family Support Division. The Family Support Division shall be served **by certified mail at**:

Director, Family Support Division
615 Howerton Court
Jefferson City, Missouri 65102

You must file the certified mail receipt with the court.

Sign Below in the Presence of a Notary Public

Your *Motion to Modify Child Custody and Support* is required to be verified in the presence of a notary public.

_____, of lawful age, being duly sworn on his or her oath, states that he or she is the person named above and that the facts stated in the *Motion to Modify Child Custody and Support* are true according to his or her best knowledge, information and belief.

▶ Justin Wach _____ Justin Wach _____
(Sign above in the presence of a Notary Public) *(Print your name above)*

The following information must be completed by a notary public.

STATE OF Missouri)
) SS
COUNTY OF St Louis)

On this 21st day of July, 2023, before me personally appeared Justin Wach, to me known to be the person described in and who executed the foregoing instrument and acknowledged that he/she executed the same as his/her free act and deed.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year first above written.

Molly Vonderlage Howell
_____, Notary Public
St Louis County, State of Missouri

MOLLY VONDERLAGE HOWELL
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES MAY 16, 2027
ST. LOUIS COUNTY
COMMISSION #23652681

My commission expires: _____

Attorney Information

This information may be completed by your attorney. Do not enter any information here if you are filing this case without the assistance of an attorney.

☐ I have assisted _____ in the preparation of these pleadings, but I am not entering my appearance on behalf of the person listed above.

_____ _____
(Attorney - Sign above) *(Missouri Bar Number)*

_____
(Attorney - Print your name above)

_____
(Street)

_____ _____ _____
(City) *(State)* *(Zip)*

( ) ( )
_____ _____ _____
(Telephone Number with Area Code) *(Fax Number with Area Code)* *(E-mail Address - Optional)*

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