

YANKTON SIOUX TRIBAL COURT)  
YANKTON SIOUX TRIBE :SS  
WAGNER, SOUTH DAKOTA )

IN TRIBAL COURT  
  
CIVIL DIVISION

_____ )	File No. _____
SSN _____ )	
Plaintiff, )	
vs. )	
_____ )	
SSN _____ )	<b>VERIFIED COMPLAINT FOR DIVORCE CHILD CUSTODY &amp; SUPPORT</b>
Defendant. )	
_____ )	
_____ )	
_____ )	

The Plaintiff, for his/her cause of action against the above name Defendant, states and alleges as follows:

1.

That the Defendant's true and correct name is: \_\_\_\_\_ and  
his/her social security number is \_\_\_\_\_ and his/her address is: \_\_\_\_\_

The Plaintiff's true and correct name is: \_\_\_\_\_ and  
her/his social security number is: \_\_\_\_\_ and his/her address is: \_\_\_\_\_

2.

That Plaintiff and Defendant were married, each to the other, in a duly solemnized ceremony on or about \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at City of \_\_\_\_\_ County of \_\_\_\_\_, State of \_\_\_\_\_. That the Plaintiff is a member of the \_\_\_\_\_ Tribe and the Defendant is a member of the \_\_\_\_\_ Tribe.

3.

That the parties have \_\_\_\_\_ minor children; namely:

_____	d/o/b	_____
_____	d/o/b	_____
_____	d/o/b	_____
_____	d/o/b	_____
_____	d/o/b	_____
_____	d/o/b	_____

The biological mother is not currently pregnant.

That the Plaintiff be granted sole legal and physical custody of the above named minor children with the Defendant being granted reasonable and liberal visitation. Further, that the Plaintiff be awarded a reasonable amount of child support to be set by the Court based upon the parties incomes.

4.

This Court has jurisdiction over the issues and parties of this divorce.

5.

That the parties have accumulated certain property during the course of their marriage. The Plaintiff would ask that the Court award her a fair and equitable division of the real and personal property.

6.

The Plaintiff and the Defendant have acquired certain debts in the marriage. The Plaintiff would ask that the debts be equitably divided.

7.

That neither party be granted alimony or spousal support.

8.

That marital difficulties have arisen between the Plaintiff and Defendant and Plaintiff is entitled to a divorce on the grounds of irreconcilable differences.

9.

That the date of separation was on or about \_\_\_\_\_  
That the parties should be responsible for their own debts since the date of separation.

10.

The wife's maiden name was \_\_\_\_\_ and she should be allowed to have it returned to her.

WHEREFORE, Plaintiff prays as follows:

A) That the bonds of matrimony now existing between Plaintiff and Defendant be severed, set aside and determined and that Plaintiff be granted an absolute divorce from the Defendant based on irreconcilable differences between the parties.

B) That this Court make an equitable distribution of the property and debts accumulated by the parties during the course of the marriage and that the Plaintiff be awarded her real property, personal property and inheritance property.

- C) That the parties be responsible for their own debt since the date of separation.
- D) That neither party be granted alimony or spousal support.
- E) That the Plaintiff be granted sole legal and physical custody of the parties minor children with the Defendant being granted reasonable and liberal visitation. That the Plaintiff be granted a reasonable amount of child support based upon the parties income.
- F) That the Plaintiff be awarded and given such other and further relief as the Court may deem just and equitable in the premises, including but not limited to reasonable attorneys fees and costs.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2\_\_\_\_\_.

\_\_\_\_\_  
Plaintiff's Name: \_\_\_\_\_

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 2\_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_  
(SEAL)

YANKTON SIOUX TRIBAL COURT )  
YANKTON SIOUX RESERVATION )  
WAGNER, SOUTH DAKOTA )

IN TRIBAL COURT  
CV #: \_\_\_\_\_

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IN THE MATTER OF:

\_\_\_\_\_  
Petitioner

V.

\_\_\_\_\_  
Respondent

SUMMONS

TO: \_\_\_\_\_ Respondent

You are hereby summoned and required to submit a written answer to the attached petition within (30) days by delivering or mailing the same to the Clerk of Court of the Yankton Sioux Tribal Court at the following address:

Yankton Sioux Tribal Court  
P.O. Box 980  
Wagner, South Dakota 57380-0980  
Phone (605) 384-5578 Fax (605) 384-5892

If you fail to answer the Petition within the time specified, a judgment of default may be entered against you and in favor of the Petitioner for the relief in which they are seeking in the Petition.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

\_\_\_\_\_  
Signature of the Petitioner

\_\_\_\_\_  
Address of Petitioner

\_\_\_\_\_  
Phone Number

Matter of \_\_\_\_\_