

JS 44 (Rev. 06/17) District of Colorado

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

<p>I. (a) PLAINTIFFS HALINA C. MORLEY</p> <p>(b) County of Residence of First Listed Plaintiff <u>WELD</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) Attorneys (Firm Name, Address, and Telephone Number) PRO SE LITIGANT</p>	<p>DEFENDANTS COUNTY OF WELD, DOES 1-100</p> <p>County of Residence of First Listed Defendant <u>WELD</u> (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known) UNKNOWN</p>
---	---

<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> </thead> <tbody> <tr> <td>Citizen of This State</td> <td><input checked="" type="checkbox"/> 1</td> <td><input checked="" type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </tbody> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input checked="" type="checkbox"/> 1	<input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input checked="" type="checkbox"/> 1	<input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p>PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p>PERSONAL INJURY</p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p>PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <p>SOCIAL SECURITY</p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<p>REAL PROPERTY</p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p>CIVIL RIGHTS</p> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p>Other:</p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<p>FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District (specify) 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 USC 1983

Brief description of cause:
VIOLATION OF CIVIL RIGHTS UNDER, BUT NOT LIMITED TO, 1ST AND 14TH AMENDMENTS TO US CONST AP Docket

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 10,000,000.00 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE: 02/21/2020 SIGNATURE OF ATTORNEY OF RECORD: HALINA C. MORLEY, PRO SE LITIGANT

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 19-cv-03534-GPG
(To be supplied by the court)

Halina C. Morley, Plaintiff

v.

Weld County, CO, et al.

_____, Defendant(s).

(List each named defendant on a separate line. If you cannot fit the names of all defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names of the defendants listed in the above caption must be identical to those contained in Section B. Do not include addresses here.)

COMPLAINT

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievances, witness statements, or any other materials to the Clerk's Office with this complaint.

A. PLAINTIFF INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Halina C. Morley; 200 N. 35th Ave. #145, Greeley, CO 80634-1177

(Name and complete mailing address)

(970) 451-2640; paintmecowgirl@hotmail.com

(Telephone number and e-mail address)

B. DEFENDANT(S) INFORMATION

Please list the following information for each defendant listed in the caption of the complaint. If more space is needed, use extra paper to provide the information requested. The additional pages regarding defendants should be labeled "B. DEFENDANT(S) INFORMATION."

Defendant 1: WELD COUNTY, CO; Weld County, P.O.Box 758, Greeley, CO 80631

(Name and complete mailing address)

(970) 400-4000

(Telephone number and e-mail address if known)

Defendant 2: WELD COUNTY, CO DHS; 315 N. 11th Ave., Greeley, CO 80631

(Name and complete mailing address)

(970) 352-1551

(Telephone number and e-mail address if known)

Defendant 3: ELIZABETH BOAZ; 315 N. 11th Ave., Greeley, CO 80631

(Name and complete mailing address)

(970) 352-1551

(Telephone number and e-mail address if known)

Defendant 4: Staci DeVore; (970) 352-1551

(Name and complete mailing address)

(970) 352-1551

(Telephone number and e-mail address if known)

C. JURISDICTION

Identify the statutory authority that allows the court to consider your claim(s): (check one)



Federal question pursuant to 28 U.S.C. § 1331 (claims arising under the Constitution, laws, or treaties of the United States)

List the specific federal statute, treaty, and/or provision(s) of the United States Constitution that are at issue in this case.

Please see attached



Diversity of citizenship pursuant to 28 U.S.C. § 1332 (a matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000)

Plaintiff is a citizen of the State of _____.

If Defendant 1 is an individual, Defendant 1 is a citizen of _____.

If Defendant 1 is a corporation,

Defendant 1 is incorporated under the laws of _____ (name of state or foreign nation).

Defendant 1 has its principal place of business in _____ (name of state or foreign nation).

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

D. STATEMENT OF CLAIM(S)

State clearly and concisely every claim that you are asserting in this action. For each claim, specify the right that allegedly has been violated and state all facts that support your claim, including the date(s) on which the incident(s) occurred, the name(s) of the specific person(s) involved in each claim, and the specific facts that show how each person was involved in each claim. You do not need to cite specific legal cases to support your claim(s). If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "D. STATEMENT OF CLAIMS."

CLAIM ONE: Please see attached

Supporting facts:

CLAIM TWO: Please see attached

Supporting facts:

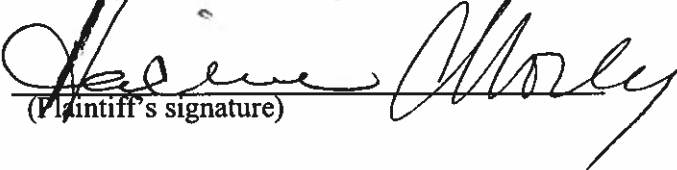
E. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "E. REQUEST FOR RELIEF."

F. PLAINTIFF'S SIGNATURE

I declare under penalty of perjury that I am the plaintiff in this action, that I have read this complaint, and that the information in this complaint is true and correct. *See* 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.



(Plaintiff's signature)

02/21/2020

(Date)

(Revised December 2017)

B. DEFENDANT(S) INFORMATION.

DEFENDANT 5: ROBYN OVERMYER

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 6: HEATHER WALKER

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 7 JAMIE ULRICH

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 8: JUDY GRIEGO

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 9: ANDREW CORDOVA

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 10: TOMAS RODRIQUEZ

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 11: KYLE RAGLAND

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 12: GABRIELLE ARREOLA

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 13: KEITH WAWRZYNIAK

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 14: JILL BECK

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 15: JOHN DOUGLAS HAINLEY

c/o WELD COUNTY, CO DHS
315 N. 11th Ave., Greeley, CO 80631
(970) 352-1551

DEFENDANT 16: ERIN CLARK

c/o Weld County, CO Court
901 9th Ave., Greeley, CO 80631
(970) 475-2400

DEFENDANT 17: TROY HAUS

c/o Weld County, CO Court
901 9th Ave., Greeley, CO 80631
(970) 475-2400

DEFENDANT 18: ELIZABETH STROBEL

2026 26TH AVE GREELEY, CO 80634

DEFENDANT 19: RYAN KAMADA

409 Whitney HBR, Windsor, CO 80550

DEFENDANT 20: JULIE GARDNER

c/o INSPIRED PATHWAY COUNSELING SERVICES LLC

1228 8th St., Greeley, CO 80631

(970) 356-8482

DEFENDANT 21: BARRY LINDSTROM

c/o Pathways Family Wellness

3211 W. 20th St. Suite D, Greeley, CO 80634

DEFENDANT 22: CITY OF GREELEY, CO

1000 10TH ST., Greeley, CO 80631

(970) 350-9757

DEFENDANT 23: GREELEY POLICE DEPARTMENT

2875 W. 10th St., Greeley, CO 80634

(970) 350-9605

DEFENDANT 24: JOHN BARBER

c/o Greeley Police Department, Badge # 226

2875 W. 10th St., Greeley, CO 80634

(970) 350-9605

DEFENDANT 25: PATRICIA MOELLMER

3219 39th Ave., Evans, CO 80620

DEFENDANT 26: LUTHERAN FAMILY SERVICES

800 8th Ave., Greeley, CO 80631

(970)356-6751

DEFENDANT 27: TAMMY FISCHER

c/o Lutheran Family Services

800 8th Ave., Greeley, CO 80631

(970)356-6751; tammyfischer@lfsrm.org

DEFENDANT 28: AMBER ONTIVEROS

c/o Lutheran Family Services

800 8th Ave., Greeley, CO 80631

(970)356-6751; amberontiveros@lfsrm.org

DEFENDANT 29: FRIENDLY VILLAGE MOBILE HOME PARK

c/o AMC FRIENDLY VILLAGE LLC
200 N. 35th Ave., Greeley, CO 80634

DEFENDANT 30: BEN TORRES

c/o AMC FRIENDLY VILLAGE LLC
200 N. 35th Ave., Greeley, CO 80634

DEFENDANT 31: WELD COUNTY ATTORNEY'S OFFICE

1150 O ST. Greeley, CO 80631
(970) 400-4000

DEFENDANT 32: LINDA GOFF

c/o Weld County Attorney's Office
1150 O ST. Greeley, CO 80631
(970) 400-4000

DEFENDANT 33: ASHLEY HUGHES

c/o Weld County Attorney's Office
1150 O ST. Greeley, CO 80631
(970) 400-4000

DEFENDANT 34: ROBERT WIEST

801 8th St., Greeley, CO 80631
(970) 888-3777

DEFENDANT 35: KATHRYN GOLDSTEIN

c/o Martin and Reed, LLC
800 N. 8th Ave. #202, Greeley, CO 80631
(970) 573-7749

DEFENDANT 36: LISA WEIBEL

800 N 8th Ave #217, Greeley, CO 80631
(970) 978-4985

DEFENDANT 37: NORTH RANGE BEHAVIORAL SERVICES

1300 N. 17th Ave., Greeley, CO 80631
(970) 347-2120

DEFENDANT 38: LUCERO CASTRO-FREDERICK

c/o North Range Behavioral Health
2350 W. 3rd St. Rd., Greeley, CO 80631
(970) 371-2120

DEFENDANT 39: AMBER SCHLEDEWITZ

c/o North Range Behavioral Health
1300 N. 17th Ave., Greeley, CO 80631
(970) 347-2120

DEFENDANT 40: NORTH COLORADO HEALTH ALLIANCE

2930 11TH Ave., Evans, CO 80620
(970) 350-4673

DEFENDANT 41: CYNTHIA (CINDY) SCHMIDT

c/o North Colorado Health Alliance
2930 11TH Ave., Evans, CO 80620
(970) 350-4673

DEFENDANT 42: MANDY HARTSHORN

c/o North Colorado Health Alliance
2930 11TH Ave., Evans, CO 80620
(970) 350-4673

DEFENDANT 43: JOANNA CRAVEN MARTINSON

c/o North Colorado Health Alliance
2930 11TH Ave., Evans, CO 80620
(970) 350-4673

DEFENDANT 44: GRIFFITH CENTERS FOR CHILDREN

710 11TH Ave. Unit # L-46, Greeley, CO 80631
(970) 888-3550

DEFENDANT 45: CAMMY (WASHINGTON) JELINEK

c/o Griffith Centers For Children
710 11TH Ave. Unit # L-46, Greeley, CO 80631
(970) 888-3550

DEFENDANT 46: ASHLEY TITUS

c/o WELD COUNTY, CO DHS

315 N. 11th Ave., Greeley, CO 80631

(970) 352-1551

DEFENDANT 47: EVANS POLICE DEPARTMENT

1100 37TH ST., Evans, CO 80620

(970) 339-2441

DEFENDANT 48: JOHN DOES 1-100

DEFENDANT 49: JANE DOES 1-100

C. JURISDICTION

Federal question pursuant to 28 U.S.C. 1331 (claims arising under the Constitution, laws, or treaties of the United States)

List the specific federal statute, treaty, and/or provision(s) of the United States Constitution that are at issue in this case.

Violations of Constitutional rights under U.S.C. 1983, to include, but not be limited to, unwarranted seizure; breach of duties imposed under special relationship; Monell-related claims; withholding of and deception in the presentation of evidence; failure to provide dependent minor continued safety and security and even minimally adequate care; breach of mandatory duties; failure to preserve parental rights and protections in the care and control of the minor child; failure to notify petitioning parent of (non)emergency-related court appearances; failure to provide due process to petitioning parent.

E. REQUEST FOR RELIEF.

1. For general damages in an amount in accordance with proof, within jurisdictional limits of the court, and;
2. For special damages in an amount in accordance with proof, within the jurisdictional limits of the court, and;
3. For punitive damages as against WELD COUNTY, CO, et al., and;
4. For any and all costs of suit incurred herein, including attorney's fees pursuant to 42 U.S.C. section 1988, and;
5. For such other and further damages as provided by law, or such further relief that the court may deem just and proper.