

IN THE 25th JUDICIAL CIRCUIT COURT, PULASKI COUNTY, MISSOURI

In re the Marriage of:
Chance Nathan Carmack and
Hailey Nichelle Carmack

Chance Nathan Carmack

[Redacted]

Petitioner,

vs.

Case No. _____

Hailey Nichelle Carmack

[Redacted]

Respondent.

PETITION FOR DISSOLUTION OF MARRIAGE

Comes now Petitioner, Chance Nathan Carmack, by and through his attorney of record, Mark E. Rector, and for his cause of action, states that:

1. Petitioner is and has been a resident of the State of Missouri for more than ninety (90) days immediately preceding the filing of this Petition and presently resides at [Redacted]

[Redacted] Pulaski County, Missouri, and has been a resident of said county

for approximately [Redacted] Respondent is and has been a resident of the State of

Missouri for more than ninety (90) days immediately preceding the filing of this Petition, now

residing at [Redacted] Pulaski County, Missouri and has been a resident of

said county for approximately [Redacted]

2. Petitioner is employed at [Redacted] Missouri and

Petitioner's social security number is [Redacted]. Respondent is employed at [Redacted]

[Redacted] Missouri and Respondent's social security number is [Redacted]

3. Petitioner and Respondent were married [REDACTED]

[REDACTED] and said marriage is registered in [REDACTED]

4. Petitioner and Respondent separated on or about [REDACTED]

5. [REDACTED]

[REDACTED]

6. During the sixty (60) days immediately preceding the filing of the Petition herein, the minor children resided in the actual physical custody of [REDACTED]

[REDACTED]

7. This Court has jurisdiction to award care and custody of said minor children to Petitioner for the following reasons:

(a) The State of Missouri is the home state of said children at the time of the

commencement of these proceedings.

- (b) Petitioner has not participated in any capacity in any other litigation concerning the custody of the children in this or any other state.
- (c) Petitioner has no information of any custody proceedings concerning the children pending in a court in this or any other state.
- (d) Petitioner knows of no person, not a party to these proceedings, who has physical custody of the children or claims to have custody or visitation rights with respect to the children.

8. [REDACTED]

[REDACTED] and that the parties should be ordered to perform the terms of a proposed Parenting Plan, which is incorporated herein by reference.

9. [REDACTED]

10. The parties are possessed of separate and marital property, and have incurred certain marital debts.

11. [REDACTED]

12. [REDACTED]

13. There is no reasonable likelihood that the marriage can be preserved, and, therefore, the marriage is irretrievably broken.

14. That Petitioner has not been convicted of or pled guilty to any offense under Chapters 566 or 568 RSMo. in which a child was a victim, or which would otherwise prohibit him from exercising custodial or visitation rights with the minor children herein.

15. In the event this Court enters an order relating to custody and visitation of the minor children, that the Pulaski County Sheriff's Department or any other law enforcement agency with appropriate jurisdiction be further ordered to enforce the terms and conditions of any such custody or visitation order.

WHEREFORE, Petitioner prays for this Court to hear and determine this cause, and, upon such hearing, the Court make a finding that the marriage of the parties is irretrievably broken and the Court order, adjudge and decree that the marriage of the parties be dissolved; that

[REDACTED]

[REDACTED] and the parties be ordered to perform the terms of a proposed Parenting Plan, which is incorporated herein by reference; that in the event this Court enters an order relating to custody and parenting time with the minor children, that the Pulaski County Sheriff's Department or any other law enforcement agency with appropriate jurisdiction be further ordered to enforce the terms and conditions of any such custody or visitation order;

[REDACTED]

[REDACTED] the Court set apart to Petitioner his separate property and make a just division of the marital property and marital debts of the parties; and for such other and further relief as the Court deems just and proper.

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Chance Carmack

Chance Nathan Carmack, Petitioner

STATE OF MISSOURI)
) ss
COUNTY OF Pulaski)

Chance Nathan Carmack, of lawful age being duly sworn on his oath, states that he is the
Petitioner named above; and that the facts stated in his Petition for Dissolution of Marriage are
true according to his best knowledge and belief.

Chance Carmack

Chance Nathan Carmack, Petitioner

Subscribed and sworn to before me this 3 day of August, 2023.

Amanda Renee Howard

Notary Public

My commission expires:

AMANDA RENEE HOWARD
Notary Public – Notary Seal
STATE OF MISSOURI
Pulaski County
My Commission Expires June 9, 2024
Commission #20361824

ALLEN & RECTOR, P.C.

By: 

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