

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

DALENE JENNIFER DANIEL,
Petitioner,

and

SCOTT SPENCER STORCH,
Respondent.

CASE NO.

FAMILY DIVISION

06 17229 FC 29

THE ORIGINAL FILED
IN THE OFFICE OF

VERIFIED COMPLAINT TO DETERMINE PATERNITY AND FOR RELATED RELIEF

Petitioner/Mother, DALENE JENNIFER DANIEL, by and through the undersigned attorney, files this Petition for Determination of Paternity and states as follows:

1. This is an action to determine paternity and establish custody, parental responsibility and child support. Petitioner, Dalene Jennifer Daniel, hereinafter called "Mother," Florida. Respondent, Scott Spencer Storch, hereinafter called "Father,"

Florida

2. Petitioner's social security number is

3. Petitioner/Mother and Respondent/Father both reside in Miami-Dade County, Florida. The child also resides in Miami-Dade County, Florida. Accordingly, jurisdiction and venue are proper in Miami-Dade County, Florida.

4. Both parties are over the age of eighteen (18) years and neither is, nor has been within the period of thirty (30) days immediately prior to the filing of this Petition, a member of the armed forces of the United States.

5. Petitioner/Mother engaged in sexual intercourse with Respondent during the period of conception and the following child is a result of the sexual intercourse: Jalen Scott Storch, a male, born in Miami-Dade County, Florida on April 16, 2006.

6. Scott Storch is the biological father of Jalen Scott Storch.

7. Advances in medical knowledge, including DNA testing, now make it possible to determine, with a high degree of certainty, the paternity of the child, and such testing should be performed at the expense of Respondent in the event that Respondent denies paternity in this action.

8. UCCJEA: Jalen Scott Storch has lived with his Mother since his birth on April 16, 2006 at her home Florida.

9. Petitioner has not participated as a party, witness, or in any capacity in any other litigation or custody proceeding in this or any other state, concerning custody of a child subject to this proceeding

10. Petitioner has no information about any custody proceeding pending in a court of this or any other state concerning a child subject to this proceeding.

11. Petitioner does not know of any individual not a party to this proceeding who has physical custody or claims to have custody or visitation rights with respect to any child subject to this proceeding.

12. The child described in this affidavit is not subject to existing child support orders in this or any state or territory.

13. Mother presently has physical custody of the child.

14. Parental responsibility for the child of the parties should be shared by both Mother and Father, pursuant to the applicable Florida Statutes. It would be in the best interest of the child of the parties if the primary residence be established with the Mother.

15. Father is able to contribute to the support of the child of the parties. Mother has inadequate resources to provide for the needs of the child of the parties and therefore needs the financial assistance of Father. An award of such support should be ordered retroactive to the child's date of birth (April 16, 2006), and should deviate more than five percent (5%) from the child support guidelines based *inter alia* on the total income and available assets of the Respondent and the needs of the child and Petitioner to support said child.

16. A policy of hospitalization, major medical and/or health insurance should be maintained for the benefit of the child. The cost of such insurance and all expenses not covered by insurance should be borne by Father.

17. Father is able to provide a life insurance policy with Mother being and remaining the beneficiary of such coverage. Mother needs to have the coverage in full force and effect in a sufficient amount to pay the support provisions hereunder in the event of Father's untimely death.

18. Petitioner incurred substantial prenatal medical expenses and she incurred substantial expenses as a result of the birth and subsequent to the birth of the minor child. Respondent is responsible for said expenses or a portion thereof and such expenses should be reimbursed by Father to Mother.

19. Mother has employed the undersigned attorney to represent her in this action and has agreed to pay reasonable attorney's fees and costs. Mother is financially unable to pay said attorney or the costs of this action, but Father is well able to do so.

WHEREFORE, Petitioner/Mother respectfully requests this honorable Court to:

A. Order blood and/or DNA testing to determine the probability that Respondent, Scott Storch, is the natural father of the child, if he denies paternity.

B. Adjudicate parental responsibility for the child pursuant to the applicable Florida statutes.

C. Award parental responsibility for the child to both Petitioner and Respondent, pursuant to the applicable Florida Statutes.

D. Award primary residential responsibility for the child of the parties to Petitioner.

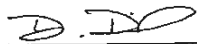
E. Award Petitioner temporary and permanent and retroactive support for said child.

F. Require Respondent to contribute to maintenance of a health, hospitalization, major medical, dental insurance policy and/or medical reimbursement plan for the benefit of the child.

G. Require Respondent to acquire and/or maintain a policy of insurance and/or a death benefit program covering the life of Respondent as security for and in an amount sufficient to pay all payments requested herein, with Petitioner named as irrevocable beneficiary thereof.

H. Require Respondent to reimburse Petitioner for out of pocket medical expenses incurred as a result of prenatal care, birth of the child and directly related to said child subsequent to his birth.

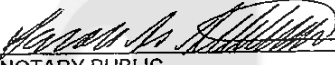
I. Require Respondent to pay Petitioner's attorney's fees and related legal expenses and costs incurred in connection with this action.



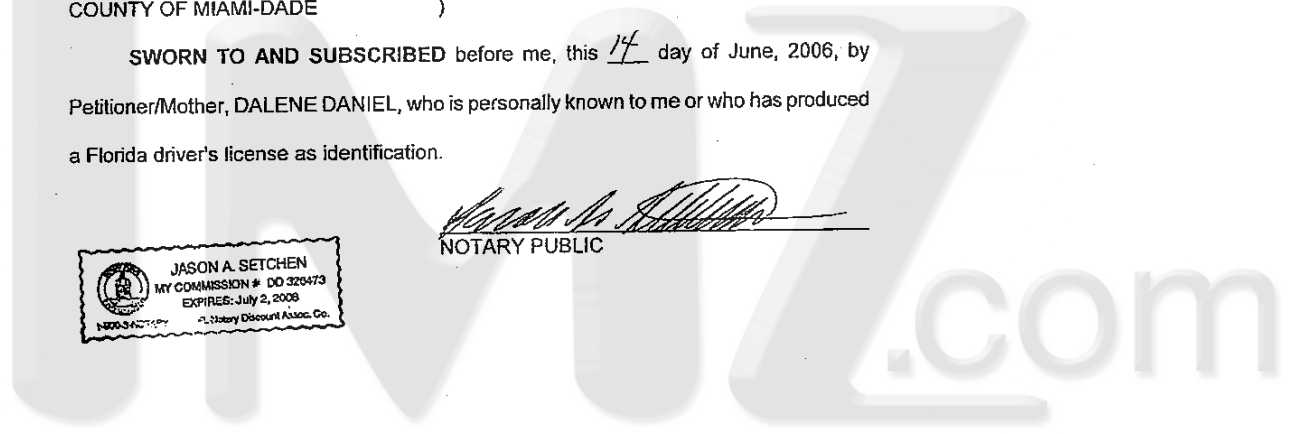
Dalene Daniel, Affiant
Petitioner/Mother

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE)

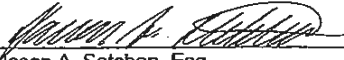
SWORN TO AND SUBSCRIBED before me, this 14 day of June, 2006, by
Petitioner/Mother, DALENE DANIEL, who is personally known to me or who has produced
a Florida driver's license as identification.



NOTARY PUBLIC



Respectfully submitted,

By: 

Jason A. Setchen, Esq.
JASON A. SETCHEN, P.A.
Florida Bar No. 0132330
999 Ponce de Leon Blvd., Suite 605
Coral Gables, Florida 33134
Tel. (305) 446-0083
Fax (305) 446-1187
Attorney for Petitioner/Mother

