

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

In re the Marriage of:

2015 JUL 7 PM 5:53

DISTRICT COURT
FILED
JUL 07 2015

[Redacted Name]

SALLY HOWE SMITH
COURT CLERK

Petitioner,

-and-

[Redacted Name]

Case No. [Redacted]

Respondent.

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

APPLICATION FOR CITATION FOR INDIRECT CONTEMPT OF COURT

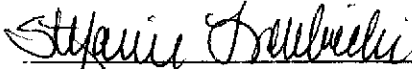
Respondent, appearing by and through her attorney, Stefanie Lorbiecki, in support of her Application for Citation for Indirect Contempt of Court states as follows:

1. On May 13, 2015, the parties entered into a Temporary Order Agreement wherein the Petitioner agreed to pay to his automobile payment and insurance, the Respondent's Automobile payment and auto insurance, Petitioner's rent, the bill on the parties' storage unit, and the Petitioner's cable bill. The parties had been separated since October 2014 and the Temporary Order was merely maintaining the status quo.
2. Immediately after entering the Temporary Order, the Petitioner intentionally violated same. He turned his vehicle back into the dealership, ceased making payments on the Respondent's vehicle and is currently \$1,564.95 in arrears, has failed to pay Respondent's rent and wrote a bogus check for her rent in the sum of \$1,025.00; is \$165.00 in arrears for the storage unit; is \$940.25 in arrears for the Respondent's cable bill and has failed to maintain Respondent's automobile insurance.

3. The Petitioner has knowingly, willfully, and contemptuously disobeyed the Orders of the Court and, and she should be cited for Indirect Contempt of Court. Throughout the parties' marriage, he was gainfully employed as an accounting consultant and consistently earned approximately \$100,000.00 for the past three years. Petitioner is a Certified Public Accountant and to the best of Respondent's knowledge, has refused to seek employment outside his area of expertise since the entry of the Temporary Order. Immediately prior to the Temporary Order hearing he claimed to be unemployed and immediately after the Temporary Order hearing, he moved his girlfriend and her children and an adult male into his household while claiming that he cannot afford to pay any of Respondent's bills.

4. The Respondent has had to employ the services to an attorney to prosecute this action and the Petitioner should be required to pay his attorneys fees and all costs of this action.

WHEREFORE, premises considered, the Respondent requests that the Petitioner be cited for contempt for her knowing, willful, and contemptuous failure to abide by the Orders of the Court, and the Petitioner be punished by a fine, imprisonment, or both, the Respondent should be awarded his reasonable attorney fees and costs incurred, all together with such other relief as the Court deems appropriate to induce the Petitioner to obey its Orders.


Stefanie Lorbiecki, OBA #11667
404 East Dewey, Suite 101
Sapulpa, OK 74066
(918) 224-3936- Telephone
(918) 224-4186- Facsimile
Attorney for Petitioner

VERIFICATION

STATE OF OKLAHOMA)

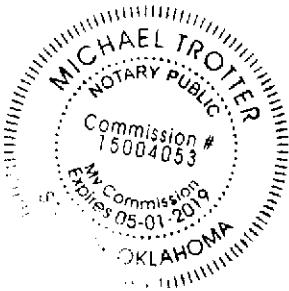
) ss.

COUNTY OF CREEK)

I, [REDACTED] of lawful age, being first duly sworn upon my oath, state: I am the Respondent in the above-styled and numbered cause; I have read the foregoing document and understand it; and the facts in it are true and correct.

[REDACTED]

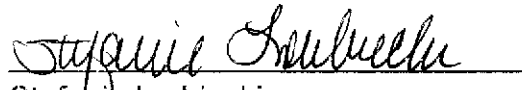
Subscribed and sworn to before me this 25 day of June, 2015.



Michael Trotter
Notary Public

Certificate of Mailing

I hereby certify that on the 25 day of June, 2015, I mailed via first class mail with proper postage affixed hereto, a true and correct copy of the foregoing to Sara Schmook, Attorney at Law, P.O. Box 701224, Tulsa,, Oklahoma 74170.



Stefanie Lorbiecki