

Respondent has resultantly incurred the inconvenience and expense of unemployment and of petitioning Denver County for the sealing of said records which is expected to be accomplished by January 17, 2003. The sealing of said records should make Respondent eligible for reemployment with his former employer, however, Respondent has also submitted over six-hundred employment applications over the past four months in an effort to be employed. (Exhibit B)

6. Respondent asserts that he has been wrongfully and fraudulently denied parenting time with his daughter this past year due, in part, to similar fraudulent allegations made in Petitioner's *Ex parte Motion* of December 18, 2001 or one day prior to the hearing on Final Orders. Said allegations and Motion were fraudulently not revealed the next day at said hearing, however, and were in fact totally contradicted by the testimony of Petitioner and her Attorney who stated under oath that the Parenting Plan was in the best interest of the daughter, [redacted]. Over one year later, Respondent has yet to be afforded the opportunity by El Paso County District Court to defend himself against said fraudulent allegations and *Motion* as the now six-year old daughter and her father continue to be punished for the fraudulent actions of the Petitioner and her now husband, Herman A. Lohse III.
7. Respondent asserts that Petitioner had an affair with her Attorney of Record, Herman A. Lohse III during the divorce and that said Attorney used his twenty years of experience in family law, and influence with El Paso County, to disrupt and destroy the lives of the ex-husband and daughter this past year. Petitioner boasted of her affair to her family who are prepared to testify to same and have been all year. Petitioner relocated the daughter and herself into the home of Herman A. Lohse, Attorney in the succeeding month following Final Orders without filing a motion to relocate a minor child and without Respondent's informed consent. Additionally, Petitioner and her Attorney were married just four months following Final Orders.
8. Respondent asserts that the aforementioned fraudulent: child support calculations (and motion for contempt citation), dismissed misdemeanor charges in Denver County, *Ex parte Motion*, and testimony at Final Orders are not inclusive but are demonstrative of the wrongful agenda of Petitioner and her now husband Herman A. Lohse, Attorney against the ex-husband and father who appeared in good faith and prose throughout the divorce. Respondent respectfully requests that the Court formally acknowledge the aforementioned unethical and immoral actions of the Petitioner and said Attorney by denying the motion for contempt citation.

Dated: January 7, 2003

Dale Kim Thorup

Petitioner/Plaintiff OR Respondent/Defendant

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CERTIFICATE OF MAILING

I certify that on January 7, 2003 (date) the original of this Motion was filed with the Court; and a true and accurate copy of this **RESPONSE TO PETITIONER'S VERIFIED MOTION FOR CONTEMPT CITATION** was served on the other party(ies) by placing it in the United States mail, postage pre-paid and addressed to the following:

Steven M. Werner, Attorney
Law Offices of Steven M. Werner, P.C.
301 S. Weber St.
Colorado Springs, Colorado 80903

Dale Kim Thorup

Petitioner/Plaintiff OR Respondent/Defendant