

**IN THE CIRCUIT COURT OF THE 19TH JUDICIAL CIRCUIT
LAKE COUNTY, ILLINOIS**

IN RE THE MARRIAGE OF:	)	
	)	
JAMES KNIGHT,	)	
	)	
Petitioner,	)	
	)	
and	)	Case No.
	)	
ROXANA KNIGHT,	)	
	)	
	)	
Respondent.	)	

PETITION FOR THE DISSOLUTION OF MARRIAGE

NOW COMES the Petitioner, JAMES KNIGHT (“Petitioner”), by and through his attorney, Zoya Madison, and pursuant to the Illinois Marriage and Dissolution of Marriage Act, 750 ILCS 5/401 (“IMDMA”), petitions this Court for Dissolution of Marriage against the Respondent, ROXANA KNIGHT (“Respondent”), and in support states as follows:

1. This Court has jurisdiction over the parties and subject matter pursuant to 750 ILCS 5/401.
2. Petitioner is 47 years of age and resides in Pleasantville, Illinois, County of Lake, and has so resided for more than 90 days immediately preceding the filing of this Petition. Petitioner is currently employed by ACME Corp.
3. Respondent is 44 years of age and resides Pleasantville, Illinois, County of Lake, and has so resided for more than 90 days immediately preceding the filing of this Petition. Respondent is currently a stay-at-home parent and freelance photographer.
4. Upon information and belief, no similar Petition for Dissolution of Marriage is pending in any other county or state.

5. Petitioner and Respondent were lawfully married on February 14, 2004, in Las Vegas, NV. Said marriage is registered in Clark County, Nevada.
6. The parties have lived separate and apart since July 24, 2019, and irreconcilable differences have caused the irretrievable breakdown of the marriage. Past attempts at reconciliation have failed, and future attempts at reconciliation would be impracticable and not in the best interests of the family.
7. Two children were born to or adopted by the parties during the marriage, namely J.S.K. (son, born 2006), who is now a non-minor child, and J.D.K. (daughter, born 2010), who is a minor. Both children have lived in Illinois for the last 6 months or more. No other children were born to or adopted by the parties, and Respondent is not currently pregnant.
8. Upon information and belief, there are no other parental responsibility proceedings pending before another division of the circuit court or another court of another state, and there are no other orders affecting parental decision-making or parenting time of the children entered by any other court.
9. The non-minor child, J.S.K., born in 2006, was diagnosed with cerebral palsy with mental impairment. This disability arose while he was a minor, he remains dependent upon the parties for his care and support, and he is not otherwise emancipated. His condition requires a consistent routine and coordinated, informed decision-making regarding daily care and ongoing therapeutic and medical services, which generate expenses beyond those of a child without such condition.
10. Pursuant to 750 ILCS 5/513.5, and by reason of the facts alleged in Paragraph 9, both Petitioner and Respondent have a duty to contribute to the support, maintenance, and extraordinary

medical and therapeutic expenses of said non-minor child in accordance with their respective financial abilities.

11. The minor child, J.D.K., born in 2010, has been evaluated and identified as academically gifted and is enrolled at Lawson Tech Academy, which involves specialized academic programming and associated enrichment activities and expenses.
12. Petitioner is a fit and proper person to be allocated parental responsibilities for the minor child, and for the reasons set forth in the foregoing paragraphs, it is in the child's best interests that Petitioner be allocated sole significant decision-making responsibilities, and the majority of parenting time.
13. Respondent is currently a stay-at-home parent who also performs freelance work. Respondent has the present ability to be employed and to earn income commensurate with her education, skills, and experience, and also has access to non-marital resources, including the trust account alleged in Paragraph 18, below. Therefore, child support for the minor child should be established in accordance with 750 ILCS 5/505, or, in the alternative, the issue should be reserved pending further order of the Court.
14. Petitioner currently maintains family health insurance coverage through his employer, ACME Corp., covering Petitioner, Respondent, and the children, including coverage adequate to address the non-minor child's ongoing therapeutic and medical needs.
15. During their marriage, Petitioner and Respondent have acquired marital property, including but not limited to the following:
 - a) The marital residence, commonly known as 111 Main St., Pleasantville, IL, 60061;
 - b) A 2015 Chevrolet Impala, titled to Petitioner;
 - c) A 2011 Toyota Sienna, titled to Respondent;

- d) A 529 college savings account held for the benefit of the minor child;
 - e) Checking account held by Petitioner with BMO Harris;
 - f) Savings account held by Petitioner with BMO Harris;
 - g) Retirement benefits held by Petitioner with his employer, including a 401(k);
 - h) Retirement benefits held by Petitioner in form of a private Rollover IRA; this asset contains traceable non-marital property belonging exclusively to Petitioner, pursuant to 750 ILCS 5/503(a)(6);
 - i) Life insurance policy held by Petitioner through his employer, the marital or non-marital character and value of which, if any, remains to be determined; and
 - j) Various items of clothing, furniture, and household furnishings.
16. The parties are now in possession of their own non-marital property to which they are respectively entitled, including, as to Respondent, a trust account inherited from her grandmother, which constitutes non-marital property pursuant to 750 ILCS 5/503(a)(1).
17. Upon information and belief, Petitioner is currently unaware of any marital debt other than the secured obligations identified above.
18. Petitioner and Respondent have made no arrangements between themselves for spousal maintenance.
19. Respondent has the ability to be employed and to earn income commensurate with her education, skills, and experience, and additionally has access to non-marital resources as alleged in Paragraph 16, above.

WHEREFORE, Petitioner JAMES KNIGHT, prays this Court grant the following relief:

- A. Enter Judgment for Dissolution of Marriage dissolving the bonds of matrimony existing between the parties pursuant to 750 ILCS 5/401, *et seq.*;

- B. Award Petitioner JAMES KNIGHT sole significant decision-making responsibilities and the majority of the parenting time for the minor child, J.D.K.;
- C. Order that child support be established for the minor child, J.D.K., according to law, or, in the alternative, that the issue of child support be reserved pending further order of the Court;
- D. Order the parties' equitable contribution to the support, maintenance, and extraordinary medical and therapeutic expenses of the non-minor child, J.S.K.;
- E. Order continuation of health insurance coverage for the children and equitably allocate between the parties all of the children's reasonable and necessary uninsured and extraordinary medical, dental, and educational expenses;
- F. Equitably divide the marital property and debts;
- G. Award to each party the non-marital property which is currently in his or her respective possession;
- H. Hold each party solely responsible for any debt or liabilities incurred in his or her own name, including those incurred during the parties' separation;
- I. Bar both parties from receiving temporary or permanent spousal maintenance; and
- J. Grant such other relief as this Court deems appropriate and equitable.

Respectfully Submitted,

Zoya Madison, Attorney for Petitioner

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CERTIFICATION PURSUANT TO SECTION 1-109

Under penalties as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

James Knight, Petitioner