

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA
FAMILY DIVISION

JAY WAYNE JENKINS,)
)
Petitioner,)
)
and) CIVIL ACTION FILE
) 2023CV385636
) NO.: _____
JEANNIE CAMTU MAI JENKINS,)
)
Respondent.)
_____)

COMPLAINT FOR DIVORCE AND OTHER RELIEF

Comes now Petitioner, **JAY WAYNE JENKINS**, and brings this Complaint for Divorce and Other Relief against **JEANNIE CAMTU MAI JENKINS**, named as Respondent above, and shows to the Court the following:

1.

Petitioner is now and has been a resident of the State of Georgia for six (6) months next preceding the filing of this Complaint for Divorce and Other Relief.

2.

Respondent is a resident of Fulton County, Georgia and is subject to the jurisdiction of this Court. It is anticipated that Respondent will acknowledge service of process. If Respondent does not acknowledge service, she may be served as provided by law.

3.

The parties were married on or about March 27, 2021, and they are currently living in a bona fide state of separation.

4.

The marriage of the parties is irretrievably broken as provided in O.C.G.A. § 19-5-3(13); there is no hope for reconciliation.

5.

The parties have one minor child born as issue of this marriage, to wit: M. JENKINS, a female child born in 2021 (hereinafter the “Child”).

6.

The Child is in the present care, custody, and control of the parties. Petitioner desires that the parties share joint legal custody of the Child on a temporary and permanent basis, and that final decision-making be established in accordance with the best interests of the Child as determined by the Court. Petitioner desires that the parties share joint physical custody of the Child, and that the specific parenting time schedule be determined by the Court consistent with the best interests of the Child.

7.

Pursuant to the Uniform Child Custody Jurisdiction and Enforcement Act, O.C.G.A. §19-9-69, Petitioner shows the following:

- (a) The Child has resided with the parties at 4520 Northside Drive, NW, Atlanta, Georgia 30327 since her birth in 2021.
- (b) Petitioner has not participated as a party, witness, or in any other way or capacity in any litigation concerning custody of the Child named herein pending to date, in this or any other state.

- (c) Petitioner has no information of any custody proceeding concerning the Child named herein pending in any court of this state or any court of another state.
- (d) Petitioner knows of no other person not a party to the proceeding who has had physical custody of the Child or claims to have custody or visitation rights with respect to the Child.

8.

Petitioner states that each party has an obligation to contribute to the support, maintenance, and education of the Child, and child support should be determined in accordance with Georgia law.

9.

The parties entered into a *Prenuptial Agreement* dated March 26, 2021, that was duly signed and executed by both Petitioner and Respondent on March 26, 2021 (hereinafter the “*Prenuptial Agreement*”) and which resolves all financial issues incident to this divorce. The *Prenuptial Agreement* should be enforced and the terms set forth therein made the final Order of this Court.

10.

There should be a division of the assets and debts between the parties as set forth in, and consistent with, the *Prenuptial Agreement*.

11.

Petitioner should be awarded his separate, non-marital property, and all appreciation thereon as set forth in, and consistent with, the *Prenuptial Agreement*.

Petitioner desires a total divorce from Respondent upon legal grounds.

WHEREFORE, Petitioner prays:

- (a) That process issue and Respondent be served according to law;
- (b) That a total divorce be granted to both parties, that is, a divorce *a vinculo matrimonii*, upon legal principles;
- (c) That the parties be awarded joint legal custody of the Child on a temporary and permanent basis, and that final decision-making be determined by the Court in accordance with the Child's best interests;
- (d) That the parties share joint physical custody of the Child, with the specific parenting time being determined by the Court in accordance with the Child's best interests;
- (e) That child support for the support, maintenance and education of the Child be determined by the Court consistent with Georgia law;
- (f) That the Prenuptial Agreement be enforced and made the final Order of this Court;
- (g) That she be awarded her pre-marital, separate, and non-marital property and all appreciation thereon;
- (h) That the assets and debts of the parties be divided as set forth in the Prenuptial Agreement;
- (i) That the Standing Order of this Court issue; and
- (j) For such other and further relief as the Court deems proper under the circumstances.

This 14th day of September, 2023.

Respectfully Submitted,

EITTREIM MARTIN CUTLER, LLC

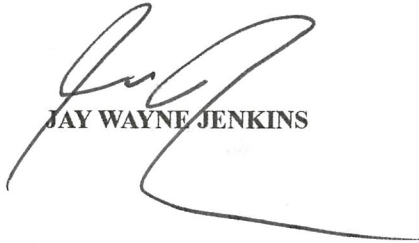
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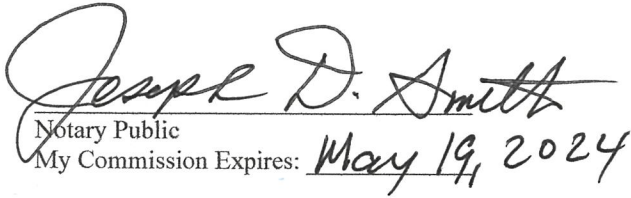
VERIFICATION

Personally appeared before the undersigned attesting officer, duly authorized by law to administer oaths, **JAY WAYNE JENKINS**, who, after being duly sworn, deposes and states that based upon his personal knowledge, the facts stated in the foregoing *Complaint for Divorce and Other Relief* are true and correct to the best of his knowledge and belief.

This 15 day of JUNE, 2023.


JAY WAYNE JENKINS

Sworn to and subscribed before me
this 15 day of June, 2023.


Notary Public
My Commission Expires: May 19, 2024



Joseph D. Smith
NOTARY PUBLIC
Gwinnett County, Georgia
My Commission Expires
May 19, 2024

