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IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2022D001031
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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT – DOMESTIC RELATIONS DIVISION**

IN RE: THE MARRIAGE OF)
)
MARIA GUADALUPE MONTERO,)
)
Petitioner/Counter-Respondent,) Case No.: 2022 D 001031
)
and) Cal.: E
)
JORGE LUIS MONTERO)
)
Respondent/Counter-Petitioner.)

PETITION FOR TEMPORARY MAINTENANCE AND OTHER RELIEF

NOW COMES the Petitioner/Counter-Respondent, MARIA GUADALUPE MONTERO (“Maria”), by and through her attorneys, CHICAGO FAMILY & IMMIGRATION SERVICES, LLC, pursuant to Sections 501 and 504 of the Illinois Marriage and Dissolution of Marriage Act (750 ILCS 5/501; 5/504) (“IMDMA”) and petitions this Honorable Court for an award of temporary maintenance and other support payable by the Respondent/Counter-Petitioner, JORGE LUIS MONTERO (“Jorge”). In support of her Petition, Maria respectfully states as follows:

1. On February 9, 2022, Maria filed her Petition for Legal Separation, which is voluntarily withdrawn.
2. On February 14, 2022, Jorge filed his Petition for Dissolution of Marriage, which remains pending and undetermined.
3. Simultaneously with the filing of this Petition, Maria filed her Counter-Petition for Dissolution of Marriage, which remains pending and undetermined.
4. Maria is currently 51 years old and is currently employed as an Uber driver as she was forced out of the marital residence as a result of Jorge’s emotional and financial controlling

behavior. For the past eight (8) years, Maria was a successful homemaker caring for the parties' minor child.

5. Maria lacks sufficient income and lacks assets and resources to pay for her reasonable and necessary living expenses.

6. Jorge recently retired in January 2022 as a gainfully employed police officer with the Chicago Police Department for twenty-one (21) years. Jorge is able-bodied and earned one hundred (100%) of the income for the marriage since on or before year 2013.

7. Jorge has refused to provide any temporary maintenance or any financial support to Maria and has inappropriately restricted Maria from all marital funds, forcing Maria to file her Emergency Petition for Temporary Restraining Order and Preliminary and Mandatory Injunction against Jorge to restrain and enjoin him from his continual unilateral restriction and control over the parties' marital monies and accounts.

8. While Maria is now an Uber driver, her income is not sufficient to support her reasonable and necessary personal expenses and her income cannot maintain a lifestyle commensurate with the standard of living during the marriage.

9. Currently no maintenance or support order exists in this matter.

10. Maria lacks sufficient income and assets to provide for her personal needs and Maria is unable to adequately support herself commensurate with the parties' lifestyle established during the marriage.

11. Jorge is well able to pay maintenance and contribute to household utilities and other expenses in amounts pursuant to the guidelines set forth in 750 ILCS 5/504.

12. In light of the above, Jorge should be ordered to pay temporary maintenance to Maria and pay household utilities and contribute to other household expenses during the pendency of this case and afterward in such reasonable and necessary amounts.

WHEREFORE, the Respondent/Counter-Petitioner, MARIA MONTERO, prays this Honorable Court order as follows:

A. Enter an Order awarding MARIA MONTERO temporary maintenance consistent with the statutory guidelines set forth in 750 ILCS 5/504;

B. Enter an Order requiring JORGE MONTERO to pay household utilities and contribute to other household expenses; and

C. For such other and further relief as this Court may deem equitable and just.

Respectfully submitted,
**CHICAGO FAMILY &
IMMIGRATION SERVICES, LLC**

Jason A. Pica

Attorney for Petitioner/Counter-Respondent

Jason A. Pica II
**CHICAGO FAMILY &
IMMIGRATION SERVICES, LLC**
Attorney for Petitioner/Counter-Respondent
53 W. Jackson Blvd., Suite 726
Chicago, Illinois 60604
Firm Code: 64286
jpica@chiattorney.com

VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the 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/she] verily believes the same to be true.

Dated: 2/14/2022

DocuSigned by:



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Maria Montero

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