

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT IN AND FOR  
MANATEE COUNTY**

**CIVIL ACTION**

THE STATE OF FLORIDA,  
DEPARTMENT OF REVENUE,  
ON BEHALF OF:  
KATINA MICHELLE BYRD,

Petitioner,

vs.

CASE NO. 2008 DR

NA'TASHA SHAWN'KIA DAVIS,

Respondent.

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**PETITION FOR SUPPORT**

Petitioner, the State of Florida Department of Revenue on behalf of Katina Michelle Byrd, sues the Respondent, Na'tasha Shawn'kia Davis, and alleges:

1. This is an action for support of dependent children pursuant to Chapter 409, Florida Statutes.

2. Katina Michelle Byrd is a resident of Manatee County, Florida, and the Respondent is a resident of Sarasota County, Florida.

3. Katina Michelle Byrd has the care and custody of the following named dependent child:

**NAME**

**DATE OF BIRTH**

Dae'quon Malik Raheem Miller

October 1, 2005

4. Respondent is the legal parent of the above-named child and owes a legal duty to provide support for said child.

5. The child is in need of temporary and/or permanent child support and the Respondent has the ability to provide support pursuant to the guidelines set forth in Chapter 61, Florida Statutes.

6. Katina Michelle Byrd is receiving Temporary Assistance for Needy Families or is otherwise receiving services pursuant to Title IV-D of the Social Security Act, 42 U.S.C. 1302 as a Non-TANF client.

7. The State of Florida, Department of Revenue and/or Katina Michelle Byrd are entitled to recover retroactive child support and administrative costs and reasonable attorney fees and legal costs from the Respondent.

8. Based upon information received, it is believed the Respondent is over the age of 18 years, and is not a member of the Armed Forces of the United States or any other country.

9. The undersigned attorney shall be attorney of record solely for the purposes authorized under Title IV-D of the Social Security Act, 42 U.S.C., s. 1302.

WHEREFORE, the Petitioner request this Honorable Court to grant the following relief:

1. To take jurisdiction of this cause and the parties hereto.
2. That this Court order the Respondent to pay temporary and/or permanent child support for the benefit of the child pursuant to the guidelines set forth in Chapter 61, Florida Statutes, until the child is no longer dependent as defined in Section 409.2554(2), Florida Statutes (1986). In the alternative, if the Court finds that the Respondent is either unemployed or underemployed, that the Court order the Respondent to apply for, and participate in the training or employment referral program between the Department of Revenue and the Department of Labor and Employment Security.
3. To require the child support payments be payable to the State of Florida Disbursement Unit, with payments to be forwarded to the proper payee.
4. To require the Respondent to be responsible for payment of the Clerk's statutory service fee, in addition.
5. That this Court determine that the Respondent owes retroactive child support which was paid by the State of Florida for the benefit of the Respondent's minor child or child support retroactive to the date of birth of the child and require the Respondent to make periodic payments on the retroactive child support obligation.
6. To award the State of Florida, Department of Revenue and/or Katina Michelle Byrd recovery for retroactive child support and administrative costs and reasonable attorney fees and legal costs from the Respondent.
7. To enter an Income Deduction Order as required by Section 61.1301, Florida Statutes.
8. To order an unemployment compensation intercept as required by Section 443.051, Florida Statutes.
9. To require the Respondent to maintain health insurance for the dependent child as required by Section 61.13(1)(b), Florida Statutes (1986).
10. To require the Respondent to purchase or maintain life insurance or a bond or to otherwise secure the child support award as required by Section 61.13(1)(d), Florida Statutes.
11. To require the Respondent to provide her social security number, current address, employer(s) and amounts of income received to the Clerk of the Circuit Court, Office of Child Support Enforcement, and further to notify the Office in writing of any change in her residence address, mailing address, employer or amounts of income received within seven (7) days of such change.
12. To require Katina Michelle Byrd to provide her social security number and current address to the Clerk of the Circuit Court, Office of Child Support Enforcement, and further to notify the Office, in writing of any change of address, within seven (7) days of such change.
13. To award the State of Florida, Department of Revenue and/or Katina Michelle Byrd recovery for retroactive child support and administrative costs and reasonable attorney fees and legal costs from the Respondent.

14. To grant such other and further relief as may be just and proper in the premises.

S/Lisa Pratt for  
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