## IN THE DISTRICT COURT WITHIN AND FOR CIMARRON COUNTY, STATE OF OKLAHOMA

VERONICA CLAIRE BUTLER, PETITIONER,	)		CIMARRON COUNTY FILED
v. TIFANY ADAMS, RESPONDENT.	) ) )	WH-2023-	NOV 08 2023
			METZI BROWN COURT CLERK By

## PETITION FOR WRIT OF HABEAS CORPUS

Comes now the Petitioner, Veronica Claire Butler, and alleges as follows:

- 1. Any and all allegations set forth in the Petitioner's Motion to Modify and Motion to Enforce Visitation as filed in Cimarron County case styled as FP-2019-1 filed on October 27, 2023 shall be as if they are set forth fully herein as well.
- 2. The current Orders controlling custody and visitation rights with regards to the subject minor children, C.E.R., born 2015 and K.C.R., born 2018, were entered herein on December 7, 2022, and filed herein on September 25, 2023. Insofar as it pertains to this Petition, the prior Order has not been modified by this or any other Court and remains in full force and effect.
- 3. The last period of specific visitation that the Petitioner was allowed to exercise with the minor children took place on July 1, 2023. The Petitioner had a supervisor with her, Ms. Nylene Johnson, for her last visitation.
- 4. The Respondent, Tifany Adams, has had exclusive possession of the minor children for the past several months, and is withholding them from both parents currently. This is not in the best interest of the children and is in violation of the Court's Orders.
- 5. The Father of the minor children, Wrangler Cole Rickman, the son of the Respondent, Tifany Adams, has himself posted on his Facebook account about his mother withholding the minor children from the Petitioner and himself in violation of the law and the current Order as outlined in FP-2019-1.
- 6. The Respondent, Tifany Adams, has not, to date, filed any action for grandparental visitation rights, nor has she filed any action to procure guardianship of the minor children. As such, her possession of the minor children is in violation of this Court's Orders and the laws of the State of Oklahoma.
- 7. Venue is proper with this Court as the Respondent, Tifany Adams, is holding the children with her at her address of HC 1 Box 17 Keyes, OK 73947.

- 8. The Respondent, Tifany Adams, is currently in violation of the Oklahoma Criminal statute 21 O.S. §891 "Child Stealing" which is a felony offense punishable by up to ten (10) years in prison. All elements of said crime are present by the actions of the Respondent.
- 9. This Court should enter its Writ of Habeas Corpus to Respondent, Tifany Adams, demanding that she produce the minor children, C.E.R., born 2015 and K.C.R., born 2018, before this Court. In the alternative, this Court should Order the sheriff to immediately take possession of the minor children away from the Respondent to allow the children to be brought before the Court.

WHEREFORE, Petitioner, Veronica Claire Butler, prays that this Court immediately issue its Writ of Habeas Corpus to Respondent, Tifany Adams, demanding that she produce the minor children, C.E.R., born 2015 and K.C.R., born 2018, before this Court, on a date certain, or in the alternative that the Court Order the Sheriff to remove the children from the Respondent to allow them to be produced before this Court, and for such other and further relief that the court finds to be and equitable in the premises including reasonable attorney fees and court costs.

Authority:

43 O.S. §112.5

12 O.S. §1332

43 O.S. §110(E)

12 O.S. §1334

Garrett R. Oates, OBA#33579

Stake & Oates, P.C.

2207 Downs Avenue

Woodward, OK 73801 Telephone: 580.254.9181

Facsimile: 580.254.9183

Email: garrett@mikestakelaw.com

Website: mikestakelaw.com

Attorney for Petitioner, Veronica Claire Butler

STATE OF KANSAS COUNTY OF STEVENS

)ss:

Veronica Claire Butler, of lawful age, being first duly sworn on oath, deposes and states that she has read this document and knows the contents thereof and things therein stated are true and correct.

ronica Claire Butler, Defendant

SIGNED AND SWORN to before me on this 6th day of November, 2023.

NOTARY PUBLIC - State of Kansas
JANETT PEINADO
My Appt Expires じろ-14-27

Notary Public

C:\Users\garre\Stake & Oates Dropbox\Server\Butler.Veronica-Paternity\Veronica Butler - Petition for Writ of Habeas Corpus.01.wpd