

FILED BY CLERK
KS. DISTRICT COURT
THIRD JUDICIAL DIST.
TOPEKA, KS

IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS
DIVISION THIRTEEN

2009 MAR 20 P 3:41

In the Matter of the Marriage of

HAL RICHARDSON
and
CLAUDINE DOMBROWSKI

Case No. 96-D-217

**DEMAND MOTION FOR JUDGE DAVID DEBENHAM TO RECUSE HIMSELF FOR
VIOATIONS OF CANNONS ONE THROUGH THREE (BIAS and PREJUDICE towards
RESPONDENT**

COMES NOW Claudine Dombrowski, not represented by an attorney and request that Judge David Debenham be forced to recuse from this case immediately.

In Support of motion:

1. A formal complaint has been filed against Judge Debenham.
2. That judge David Debenham thinks he is a 'god' and hears and rules on his own motions against respondent.
3. Judge Debenham has not only violated the cannons of judicial ethics but has continued to violate the human and civil rights of the mother and minor child .
4. This case leads in suit filed against at the inter-American Commission Human rights Dombrowski et al v US for the policy and practices of courts granting sole custody to abusers.
5. That irreparable harm has come to both the mother and child as a result of Judge David Debenhams erroneous rulings.
6. Motions filed by the mother go ignored while motions filed by the plaintiff are heard with damaging effects towards to respondent.



7. Judge David Debenham has shown his bias and prejudiced towards the respondent as evidenced in the last two hearings and transcripts.
8. Judge David Debenham has directed that the Violence committed towards the respondent be stricken from the record as evidenced by the December 16, 2008 transcript when respondent stated time after time that she was on 100% disability as direct result of the petitioners violence committed against her.
9. That Judge David Debenham continues to violate the laws of Federal, State and county guidelines. In that the attached motion fiked before the show cause of the petitioner has been ignored and is in complete violation of said federal State and county guidelines.
10. That Judge David Debenham on his own and without motion from either party set a hearing for counsel for respondent for Don Hoffmans Show cause motion and directly set the show cause motion for hearing.
11. Has hurt the minor child and has not followed the "Best Interest of the Child" rule, by allowing a known admitted and convicted batterer to have complete control over the child's rights to see her mother contingent on the petitioners known threats to the child. The BEST INTEREST OF THE CHILD has been ignored causing irreparable harm to the child.

Therefore, it is more than clear to respondent that Judge David Debenham has stepped over the lines of impartiality by setting HIS OWN hearing March 17, 2009 at 1:00 PM and Judge David Debenham has clearly stepped over the lines of the cannons in that it is more than obvious he is working with the petitioners counsel in the goal to "jail mommy" hearings SET April 6th at 1:00 PM for (1/2 day) in accordance with the petitioner's motions.

- a.) Judge David Debenham is bias and is prejudice towards respondent.
- b.) Has violated the respondents fourteenth amendment rights
- c.) the right to due process
- d.) the right to equal protection
- e.) The right to know evidence presented against her.
- f.) The right to present evidence.
- g.) the right to access to 'Justice.'

That Judge David Debenham be forced to recuse immediately and that JUSTICE be restored in the instant case.



Claudine Dombrowski date 3-20-2009
Mother/Respondent
Po box 4974, Topeka Ks ACP, SaH
C: 785.845.3417

CERTIFICATE OF SERVICE

I the undersigned hereby certify that on the 20TH day of March, 2009, served a true and correct copy of the above and foregoing pleading: **DEMAND MOTION FOR JUDGE DAVID DEBENHAM TO RECUSE HIMSELF FOR VIOATIONS OF CANNONS ONE THROUGH THREE (BIAS and PREJUDICE towards RESPONDENT**, with the Clerk of the District Court, Domestic Filings, Judge Debenham, and Chief Judge Nancy Parrish via Facsimile in accordance with Supreme Court Rule 119(b)(3) and sent a copy of the forgoing document, by U.S. Mail, postage prepaid to:

Don Hoffman
100 E. 9th Street
Topeka, KS 66612

Jill Dykes
1243 SW Topeka Blvd.
Topeka, KS 66612



Claudine Dombrowski date 3-20-2009
Mother/Respondent
Po box 4974, Topeka Ks ACP, SaH
C: 785.845.3417