

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS
_____ DIVISION

CASSANDRA PENA-ROMERO

PLAINTIFF

VS.

CASE NO. _____

OMAR PENA-ROMERO

DEFENDANT

COMPLAINT

Comes the Plaintiff, Cassandra Pena-Romero, *pro se*, and, for her Complaint for Divorce against the Defendant, Omar Pena-Romero, states and alleges as follows:

1. The Plaintiff meets all statutory residence requirements in order to maintain this action.
2. The Plaintiff is a resident of Pulaski County, Arkansas and has been for more than sixty (60) days.
3. The Defendant is a resident of Pulaski County, Arkansas.
4. For the abovementioned reasons, jurisdiction and venue are proper pursuant to Arkansas Code Annotated § 9-12-303.
5. The Plaintiff and the Defendant were married on or about October 16, 2019. and lived together as husband and wife until on or about August 2023.
6. The Defendant is currently incarcerated in the Pulaski County Jail and is charged with having committed a Y Felony, namely rape of the Plaintiff, as well as aggravated assault on a household member, and interference with emergency communication.

1. A temporary restraining order was entered against on the Defendant on or about August 7, 2023 in the Maumelle District Court, Case Number MUC-23-1414. Exhibit A.
2. The Plaintiff was seen at Baptist Health Medical Center for an examination and evidence collection following the assault. Exhibit B.
3. The Plaintiff respectfully requests that the Court schedule the matter of temporary custody of the minor child for a hearing at the earliest available opening on the docket.
4. The Plaintiff respectfully requests that she be granted an absolute divorce from the Defendant.
5. There one (1) child born of the marriage, namely, [REDACTED] (DOB: 2/2/2022). There are no other children expected of this marriage.
6. The Plaintiff is a fit and proper person to have custody of the child and respectfully requests she have sole legal custody of the minor child, and that the Defendant have no visitation or limited supervised visitation with the minor child.
7. The Defendant is not a fit or proper person to have custody of the child. The Defendant voluntarily admitted himself to the Baptist Health psychiatric ward on or about August 1, 2023 and remained in that ward until on or about August 6, 2023. While in said ward he presented with suicidal ideation and homicidal ideation.
8. On or about August 7, 2023 the Defendant showed the Plaintiff a suicide note he had written.

9. On several occasions the Defendant has threatened to physically harm the Plaintiff.
10. Upon belief and information, the Defendant is a flight risk. In August 2023 the Defendant has threatened to take the minor child, steal an ambulance, and flee. The Defendant is a DACA recipient from Mexico.
11. The Plaintiff respectfully requests that the Defendant be ordered to pay to the Plaintiff child support for the care and maintenance of the parties' minor child.
12. There are property rights and/or marital debts to be adjudicated.
13. The Defendant is not in active military service.
14. The Plaintiff is entitled to an absolute divorce from the Defendant on the grounds of general indignities or alternatively on the grounds of cruel and barbarous treatment so as to endanger the life of the Plaintiff, as set forth in Arkansas Code Annotated § 9-12-301.
15. The Plaintiff requests that her surname is amended to Frederickson-Pena.
16. The Plaintiff respectfully requests that the Court schedule the matter of temporary custody for an emergency hearing at the earliest available opening on the docket and an immediate order for temporary custody of the minor child be entered.
17. The Plaintiff reserves the right to amend her Complaint.

WHEREFORE, the Plaintiff, Cassandra Pena-Romero, prays that she be awarded a decree of absolute divorce of and from the Defendant, Omar Pena-Romero; that she be awarded sole legal custody of the minor child; that the Defendant have visitation with the

minor children and have no visitation or limited supervised visitation with the minor child; that the Defendant be ordered to pay to the Plaintiff child support for the care and maintenance of the parties' minor child; for the adjudication of property rights and/or marital debts; that her surname be amended to Frederickson-Pena; that the Court schedule the matter of temporary custody for an emergency hearing at the earliest available opening on the docket, that an immediate order for temporary custody of the minor child be entered, that the Defendant be ordered to pay all attorney's fees and costs of this action; and for all other just and proper relief to which she may be entitled.

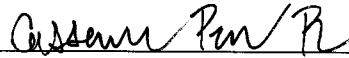
Respectfully submitted,



Cassandra Pena-Romero, *pro se*
8000 River Pointe Dr #3A11
Maumelle AR, 72113

VERIFICATION AND AFFIDAVIT

I, Cassandra Pena-Romero, after being duly sworn, on oath, state, according to the best of my knowledge, information, and belief, that the allegations and statements contained in the foregoing Complaint are true and correct.



Cassandra Pena-Romero

Subscribed and sworn to, before me, a Notary Public, this 11th day of August, 2023.



NOTARY PUBLIC

My Commission Expires:

3/18/2025

