

STATE OF MICHIGAN  
SIXTH JUDICIAL CIRCUIT  
FAMILY DIVISION

MOTION TO CHANGE  
PARENTING TIME ORDER  
(FOC REFEREE HEARING ONLY)

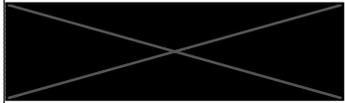
CASE NO.  
2014-815840-DM

Court Address, 230 Elizabeth Lake, PO Box 436012, Pontiac, MI 48343-6012 Telephone No: (248) 858-0424;

FAX No: (248) 858-0461

PLEASE PRINT OR TYPE INFORMATION

**\$100.00 Filing Fee  
No Out of State Checks**

Plaintiff's Name, Address & Telephone No.  
KRISTINA ELAINE KARAMO  


Defendant's Name, Address & Telephone No.  
ADOM KARAMO  


1. A judgment or order regarding parenting time with: (names and birth dates of children)

 KARAMO /2008  
 KARAMO /2009

has  has not been entered.

2. It is in the best interest of the minor children to change the parenting time because:

(You must provide specific reasons for requesting this change.)

After moving back to the U.S. I now have a stable home in the State of Florida. The Michigan Child Custody Act presumes it to be in the best interest of a child to have a strong relationship with BOTH parents. The current parenting time order makes that nearly impossible given I am granted ZERO overnight stays with my children and I receive zero cooperation from their mother in terms of allowing me to spend time with them in Florida during Summer, Winter or Spring breaks. Further, their Mother has seemingly done everything in her power to alienate me from my children. All best interest factors militate towards granting me, the father, significant overnight stays as further explained in the attachment.

3. I ask the court to change the parenting time order to:

(You must specify what parenting time schedule you are requesting.)

Children spend 60 overnight stays with Father in Florida during Summer breaks.  
Children spend 10 overnight stays with Father in Florida during Winter breaks.  
Children spend 5 overnight stays with Father in Florida during Spring breaks.  
Children spend remaining 290 overnights with Mother in Michigan.

I declare that the above statements are true to the best of my information and belief AND that I have requested the above change from the other party on July 7, 2021, but that request has been refused.  
Date

October 7, 2021  
Date

  
Signature of Party Filing Motion

FILED Received for Filing Oakland County Clerk 10/8/2021 1:45 AM

<b>STATE OF MICHIGAN SIXTH JUDICIAL CIRCUIT FAMILY DIVISION</b>	<b>MOTION TO CHANGE PARENTING TIME ORDER (FOC REFERREE HEARING)</b>	<b>CASE NO.  2014-815840-DM</b>
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Court Address: 230 Elizabeth Lake, PO Box 436012, Pontiac, MI 48243-6012 Telephone: (248) 858 0424 Fax: (248) 858 0461

**KRISTINA ELAINE KARAMO vs ADOM KARAMO**

**MOTION TO CHANGE PARENTING TIME**

Addendum to Question 2

It is in the best interest of the minor children to change the parenting time based on the following evaluation of best interest factors under 722.23.

(a) The minor children's Father initially left the State of Michigan due to the tragic murder of his father, a retired educator, in The Bahamas in 2015 at the hands of his son-in-law. Despite the difficulty of coping with this tragedy and the immense rift it created in his family, Father continued to maintain and cultivate love, affection and strong emotional ties with his children. While Father's relationship with his younger daughter has remained unblemished despite moving out of State, his relationship with his older daughter has suffered over the last two years. Importantly, it was not father's move that upended his relationship with his oldest daughter, L.A.K. The children's Mother, in fact, has made accusations about Father's alleged sexual improprieties and have discussed these allegations with L.A.K. in very graphic and explicit detail. Prior to Mother engaging in these highly inappropriate conversations with L.A.K. who had previously insisted on spending time with Father, Father's relationship with L.A.K. was very strong and daughter would regularly refer to Father as, "the best dad in the world." After Mother shared her accusations about sexual improprieties with L.A.K., she became verbally abusive to Father, regularly stating "Fu\_k you." Nonetheless, Father's relationship with his younger daughter, L.R.K. remains unaffected by Mother's graphic sexual stories, and Father remains confident that he will be able to improve communications with L.A.K., if he is granted the time sharing that both the Court and Mother are currently denying him.

(b) Regardless of the time Father spent outside of the country in the aftermath of his father's murder, during the subsequent legal proceedings, and assisting his elderly mother through the ordeal, he has always demonstrated the capacity and disposition to give his children love, affection, guidance and the continue their education and training. Father continues to make every effort to enhance his relationship with his daughters as well as referring books and resource materials to help them learn new information and excel academically. It should be noted that Father's current request is for time sharing over the school breaks, however, and does not infringe on their school schedule.

(c) After returning to the United States in 2018, Father has made significant progress in terms of establishing a stable home and being able to provide his daughters with basic needs such as food, clothing, medical care and other remedial care. Father's request for parenting time over the school breaks does not necessitate the purchase of clothes, but he is able to provide the children with food, clothes, if necessary, medical care, in the case of an emergency and any nature of remedial care. Father also has support from additional family members who live in Florida including a brother, a sister and several nephews and nieces.

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(d) At this time the father is not seeking a change in the primary residence of the children. He is seeking parenting time during school breaks. While the children will maintain their stable, presumably satisfactory environment and that continuity will remain undisturbed for the time being, he also offers stability, a satisfactory environment and a degree of continuity by having the children spend Summer, Winter and Spring breaks with him consistently each year.

(e) Here again, the Father is not currently seeking a change in the custodial home for the children, he is merely seeking significant parenting time that has been denied to him by Mother. Any time Father receives in overnight visitations in Florida, will not undermine the sense of permanence that the children enjoy at their custodial home.

(f) The Father has always demonstrated the moral fitness to spend time with his daughters in Florida. To the contrary, it was Mother who had threatened to kill her daughters in response to Father asking for a divorce. Father was in fact trapped in the marriage for years, always subject to the threat of Mother committing suicide. Eventually, Mother was committed to an institution for evaluation due to her efforts at self-harm and suicide. Father was advised by family members not to disclose the fact that Mother had sought to kill her own daughters at the time, being assured that she was merely suffering from a nervous breakdown due to marital problems. Importantly, Father does not raise this issue to denigrate Mother, only to make the point that he has always been morally upstanding as it relates to his relationship with his daughters whereas Mother has literally sought to take their lives on previous occasions.

(g) Father is in great mental and physical health. To the best of Father's knowledge, Mother is in good physical health but he is unsure of her current mental state. He does believe, however, that Mother is in better mental health than she was when the parties marriage ended and he has no current fears about the physical safety of the children while in Mother's care.

(h) Given Mother has not allowed the children to spend any time with Father in Florida, there are no considerations to weigh as to the issues of home, school and community record of the children while in Father's care. In Mother's care, the home, school and community record of the children are satisfactory.

(i) The Father knows for a fact that his younger daughter, L.R.K. is in favor of changing the Parenting Time in order to spend significant time with him over the school breaks. He also believes that at 12 years old, L.R.K. is of a sufficient age to express a preference on the matter. Father' also believes that L.A.K. was in support of such a change prior to Mother's efforts to turn L.A.K. against him by sharing with her Mother's wildly inappropriate accusations of Father's supposed cheating, including graphic details that she either made up or are genuinely mistaken about.

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(j) The most significant factor that Father believes the Court should consider in awarding this Motion is the extent to which Mother, as well as the children's maternal grandmother have gone to great lengths to discourage a close and continuing relationship between the children and their Father. Father has already indicated Mother's habit of discussing graphic allegations of sexual impropriety with children. Additionally, however, she continues to refuse to allow them to visit Father in Florida to spend any meaningful time. The most Mother has agreed to is to visit Florida herself with the children for a very brief period of time, but insist Father pays for her vacation with the children. Father, however, is seeking to spend significant time with his daughters and believes it is important that he be spend time with his daughters alone and in an environment free from Mother's references to reviving their relationship or otherwise making it about father's relationship with her, rather than father's relationship with the children. Further still, Father has purchased communication devices such as mobile phones and tablets for daughters to enable him to regularly communicate with them. Each time, however, Mother has taken the devices from the children to prevent him from having the ability to communicate with them. Further still, the children's maternal grandmother, with whom Mother lives, has insisted that any phone sent to the children by Father in order to help them remain in communication is "not allowed in her house." Although the parties divorced several years ago, both Mother and maternal grandmother continue to hold a grudge against Father and to do everything in their power to obstruct the relationship between Father and his daughters.

(k) There have not been any incidents of domestic violence on part of Father. There have been incidents in which Mother has threatened to harm the children and/or herself, including an occasional in which she attempted to wrestle control of the vehicle while father was driving with the children in the back, and crash it. Specifically, Mother stated, "Fu\_k it, I'll kill us all." I do not believe that Mother is currently in this state of mind, however, as this was several years ago. I do believe, however, that her children have been the only thing that has kept her sane, and hence I have not been as aggressive as I should have been in terms of pursuing parenting time legally, because I had fears about how she might react should Father be granted significant time with daughters. At this juncture however, Father has given Mother multiple years to accept that their marriage is over, multiple years to adjust to allowing her children to visit Father out of State yet Mother continues to obstruct not only his visits but his opportunities to communicate with the children. Father therefore has no choice but to pursue parenting time as Mother has made it abundantly clear that she opposes any parenting time arrangement that would allow Father to have his daughters spend time with him in Florida where he lives.

(l) Father is deeply concerned about the parental alienation Mother continues to engage in. While Father recognizes many positive attributes of Mother, he continues to reel under Mother's efforts to drive a wedge between the natural love, affection and bond between Father and his daughters. Father has made countless attempts to dissuade mother from this kind of conduct, to no avail.