

District Court, Fremont County, Colorado 136 Justice Center Road, Cañon City, Colorado 81212 Phone Number: (719) 269-0100	▲ COURT USE ONLY ▲
THE PEOPLE OF THE STATE OF COLORADO IN THE INTEREST OF: ASHLEY FIELDS, a Child, And Concerning: APRIL FIELDS (Mother), Respondent.	
Rocco F. Meconi, Rocco F. Meconi, P.C. 718 Main Street, Cañon City, CO 81212 Phone Number: (719) 275-7551; Atty. Reg. #: 5164	
MOTION TO ADD SPECIAL RESPONDENT	


THE PEOPLE OF THE STATE OF COLORADO, by and through the Fremont County Department of Human Services, moves this court for its order adding Suzanne Shell as a Special Respondent in the above-captioned case for the limited purposes of entering orders that prevents her from contacting the minor child or the Respondent mother in any way and from otherwise being involved in the proceedings in this case, including, but not limited to, acting as counsel for the Respondent mother or otherwise engaging in the unauthorized practice of law.

AS GROUNDS THEREFORE it is shown unto the court as follows:

1. Said individual has involved herself in this case in such inappropriate and unauthorized ways. The statements of record made at the hearing conducted on April 15, 2003 are incorporated herein by reference.
2. Such conduct and contact are inappropriate and contrary to the best interest of the minor child.
3. Upon information and belief, unless deterred by this court, the proposed Special Respondent will continue to engage in conduct which is detrimental to the best interest of the child.
4. The court is authorized to name Ms. Shell as a special respondent pursuant to the provisions of §19-3-503(4), CRS, which authorizes the court to join any person it deems necessary to the action. See *People v. District Court*, 731 P.2d 652 (Colo. 1987).

WHEREFORE, the People pray for the above-requested relief.

Dated this 15th day of April, 2003.


Attorneys for the Fremont County Department of Human Services

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2003, a true and correct copy of the above and foregoing was served as follows:

NAME AND ADDRESS	US MAIL	COURT BOX
Anna Hall-Owen, Esq., 417 Main St., Cañon City, CO 81212	X	X
Dan Kender, 131 S. Union Ave., Pueblo, CO 81003	X	
Suzanne Shell, 14053 Eastonville Rd., Elbert, CO 80103	X	


Legal Assistant