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Third District Juvenile Court  
FOR SALT LAKE COUNTY, STATE OF UTAH

|                                                 |                                                        |
|-------------------------------------------------|--------------------------------------------------------|
| STATE OF UTAH, in the interest of               | Order Allowing Alternative Service through Publication |
| MARTINEZ VILLATORO, 03-20-2013<br>SANTOS JULIAN | Case No. 1233492                                       |
| A person under the age of 18 years              | Judge David Johnson                                    |

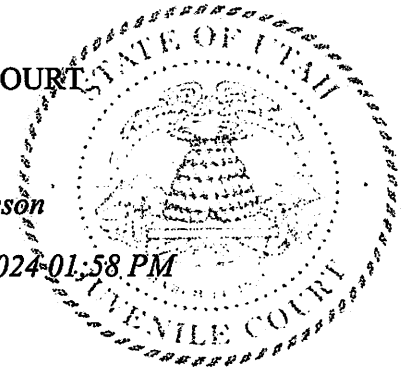
The matter came before the Court on the Petitioner's Petition for Custody & Guardianship on April 25, 2024 at 10:30 am. During the hearing the issues of service upon the biological father was discussed. Based on the facts alleged in the Petition for Custody and that the whereabouts of the biological father are unknown but that based upon information and belief the biological father was last residing in Mexico, the Court finds good cause and hereby;

ORDERS that service can be executed against the biological father by publication through GlobalLegalNotices.com. This publication shall be once every week for four weeks consecutively.

SIGNED BY THE COURT

*/s/ Judge David Johnson*

*and filed on 04-30-2024 01:58 PM*



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IN THE THIRD JUDICIAL JUVENILE COURT – SALT LAKE

IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

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|------------------------------------------|---|-------------------|
| STATE OF UTAH IN THE INTEREST OF         | : | <b>SUMMONS</b>    |
|                                          | : |                   |
| SANTOS JULIAN MARTINEZ                   | : |                   |
| VILLATORO                                | : | Case No.: 1233492 |
| (03/20/2013)                             | : |                   |
|                                          | : | Judge: Johnson    |
| A Child Under the Age of Eighteen Years. | : |                   |

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The State of Utah to Pablo Alberto Martinez Antonio:

You are summoned and required to answer the attached complaint/petition. Within 30 days after service of this summons, you must file your written answer with the clerk of the court at the court the Third Judicial Juvenile Court located at 450 South State Street, Salt Lake City, UT 84111. Within that same time, you must mail or deliver a copy of your answer to the party or the party's attorney at the address shown above. If you fail to do so, judgment by default may be taken against you for the relief demanded in the amended petition, which is has been filed with the clerk of the court.

DATED: April 30, 2024

FILLMORE SPENCER LLC

/s/ Laura Lui  
T. Laura Lui  
*Attorneys for Petitioner*

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IN THE THIRD JUDICIAL JUVENILE COURT  
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH

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|                                        |   |                          |
|----------------------------------------|---|--------------------------|
| STATE OF UTAH, in the interest of      | : | PETITION FOR CUSTODY AND |
|                                        | : | GUARDIANSHIP             |
| SANTOS JULIAN MARTINEZ                 | : |                          |
| VILLATORO                              | : |                          |
| (03/20/2013)                           | : | Case No.:                |
|                                        | : |                          |
|                                        | : | Judge:                   |
| Child Under the Age of Eighteen Years. | : |                          |

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COMES NOW Petitioner, Consuelo De Jesus Villatoro-Villatoro (hereinafter  
“Petitioner” or “Ms. Villatoro”), by and through counsel T. Laura Lui and of FILLMORE  
SPENCER, LLC, hereby submit this Petition seeking custody and guardianship of the minor  
child, Santos Julian Martinez Villatoro. Petitioner alleges Santos Julian Martinez Villatoro is  
within the age of juvenile court jurisdiction and that he is an abused, abandoned and neglected  
child within the provision of UCA §80-3-405. This Petition is based upon the following  
allegations:

1. Santos Julian Martinez Villatoro is a male child born in Guatemala on March 20, 2013.

2. Petitioner Consuelo De Jesus Villatoro-Villatoro is the child's biological mother. Ms. Villatoro resides at 7947 Sheva Cir, Magna, Utah 84044, and has done for one year.

3. Venue lies in this Court pursuant to UCA § 80-3-405, in that the child resides in Salt Lake County with Ms. Villatoro.

4. The child's biological father is Pablo Alberto Martinez Antonio. To the best of Petitioner's knowledge, the father has an unknown address.

5. In 2021, masked men assaulted and kidnapped the child's father in Cuauhtemoc City, Mexico. The father was not heard from again. Three weeks after this incident, the child mom made the decision for them to leave their home in Cuauhtemoc City. They returned to the border, La Mesilla and stayed at the grandmother's house for about three to five months. Because of fear that something would happen, they never left the house. Few months later, the mother started working and the child started school. The child was bullied by few classmates and the school was trying to put a stop to it but it never stopped because armed men told those kids to bully the child. The bullying continued from 2022 to February 2023.

6. The mother noticed that they were being watched after she picked up the child from school one day. They were followed by a few men and they threatened the family members and tried to kidnap the child. They injured the child's right leg. There were others there and they came to the child's rescue. The men fled, leaving the child behind. They tried to catch those

men, but they couldn't find them. The child was too scared to go to school after that. The child told his mom that he doesn't want to go to school anymore. Individuals also broke into their residence and broke all the windows of the house.

7. Due to a fear of further injury, Petitioner decided in May 2023, to leave Mexico and seek safety in the United States.

8. The child has no one in Mexico who can care and protect him. He is at peace now knowing that he is safe here in the United States of America.

9. Child resides with Petitioner at 7947 Sheva Cir, Magna, Utah, 84044

10. A referral has been made to Utah Child Protective Services. The referral case number is 3069599.

**WHEREFORE** Petitioner prays that the Court find as follows:

1. THAT the above-named child is abused, neglected and/or abandoned pursuant to Utah Code Ann. §§80-3-405, et seq. in that biological parents failed to protect the minor child and abandoned him in Mexico and in the United States without provision for his care;

2. THAT the above-named child is within the jurisdiction of the Juvenile Court;

3. THAT Petitioner is in all respects fit custodian and guardian for the child;

4. THAT it is in the child's best interest to appoint Petitioner as his custodian and guardian;

5. THAT reunification with the child's parents is not viable due to the fact that the father have failed to protect and abandoned the children and the biological father are unable or unwilling to care for them in the United States;

6. THAT it is not the best interest of these child to be returned to his country of nationality, or last habitual residence, as there are no suitable relatives or other persons there who are able to provide care for them. If returned to Mexico, the child would likely be subject to further abuse, neglect or abandonment.

Based upon there finding, Petitioner respectfully moves the Court to:

1. ORDER that permanent custody and guardianship of the child be awarded to Petitioner;
2. For such other Orders as the Court deems necessary.

DATED: January 9, 2024

FILLMORE SPENCER LLC

/s/ Laura Lui  
T. Laura Lui  
Attorney for Petitioner

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**IN THE THIRD JUDICIAL JUVENILE COURT  
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

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|                                               |          |                                      |
|-----------------------------------------------|----------|--------------------------------------|
| <b>STATE OF UTAH, in the interest of</b>      | <b>:</b> | <b>PETICIÓN DE CUSTODIA Y TUTELA</b> |
|                                               | <b>:</b> |                                      |
| <b>SANTOS JULIAN MARTINEZ</b>                 | <b>:</b> | <b>Case No.: 1233492</b>             |
| <b>VILLATORO</b>                              | <b>:</b> |                                      |
| <b>(03/20/2013)</b>                           | <b>:</b> | <b>Judge: Johnson</b>                |
|                                               | <b>:</b> |                                      |
|                                               | <b>:</b> |                                      |
| <b>Child Under the Age of Eighteen Years.</b> | <b>:</b> |                                      |

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**La Peticionadora, Consuelo De Jesús Villatoro-Villatoro (en adelante "Peticionaria" o "Sra. Villatoro"), por y a través de la abogada T. Laura Lui y de FILLMORE SPENCER, LLC, por este medio presenta esta Petición solicitando la custodia y tutela del menor Santos Julián Martínez Villatoro. La peticionaria alega que Santos Julián Martínez Villatoro se encuentra dentro de la edad de jurisdicción de la corte de menores y que es un niño abusado, abandonado y descuidado dentro de la disposición de UCA §80-3-405. Esta petición se basa en las siguientes alegaciones:**

**1. Santos Julián Martínez Villatoro es un niño que nació en Guatemala el 20 de marzo de 2013.**



2. La peticionaria Consuelo De Jesús Villatoro-Villatoro es la madre biológica del niño. La Sra. Villatoro reside en 7947 Sheva Cir, Magna, Utah 84044, y lo ha hecho durante un año.

3. La jurisdicción está establecida en este Tribunal de conformidad con UCA § 80-3-405, ya que el niño reside en el Condado de Salt Lake con la Sra. Villatoro.

4. El padre biológico del niño es Pablo Alberto Martínez Antonio. Según el conocimiento de La peticionaria, el padre tiene una dirección desconocida.

5. En 2021, hombres enmascarados agredieron y secuestraron al padre del niño en la ciudad de Cuauhtémoc, México. No se volvió a saber del padre. Tres semanas después de este incidente, la madre del niño tomó la decisión de que abandonaran su hogar en la ciudad de Cuauhtémoc. Regresaron a la frontera, La Mesilla y se quedaron en la casa de la abuela entre tres y cinco meses. Por miedo a que pasara algo, nunca salieron de casa. Pocos meses después, la madre comenzó a trabajar y el niño comenzó la escuela. El niño fue acosado por algunos compañeros de clase y la escuela intentó detener la situación, pero nunca se detuvo porque hombres armados les dijeron a esos niños que intimidaran al niño. El acoso continuó desde 2022 hasta febrero de 2023.

6. La madre se dio cuenta de que estaban siendo vigilados después de que un día recogiera al niño de la escuela. Los miembros de la familia fueron perseguidos y amenazados por unos hombres, y ellos intentaron secuestrar al niño. Lesionaron la pierna derecha del niño. Había otras personas allí y acudieron al rescate del niño. Los hombres huyeron, dejando al niño atrás. Trataron de atrapar a esos hombres, pero no pudieron encontrarlos. El niño estaba demasiado asustado para ir a la escuela después de eso. El niño le dijo a su mamá que ya no quería ir a la

escuela. Los individuos también irrumpieron en su residencia y rompieron todas las ventanas de la casa.

7. Debido al temor de sufrir más lesiones, La peticionaria decidió, en mayo de 2023, abandonar México y buscar seguridad en los Estados Unidos.

8. El niño no tiene a nadie en México que pueda cuidarlo y protegerlo. Ahora está en paz sabiendo que está a salvo aquí en los Estados Unidos de América.

9. El niño reside con La peticionaria en 7947 Sheva Cir, Magna, Utah, 84044

10. Se ha hecho una referencia a los Servicios de Protección Infantil de Utah. El número de caso de referencia es 3069599.

**POR LO TANTO, La peticionaria solicita a la Corte que determine lo siguiente:**

1. QUE el niño mencionado anteriormente es abusado, descuidado y/o abandonado de conformidad con el Código Anotado de Utah §§80-3-405, et seq. en el sentido de que el padre biológico no protegió al menor y lo abandono en México y en los Estados Unidos sin provisión para su cuidado;

2. QUE el niño antes mencionado se encuentra dentro de la jurisdicción del Tribunal de Menores;

3. QUE La peticionaria es en todos los aspectos el custodio y tutor idóneo para el niño;

4. QUE es en el mejor interés del niño designar a La peticionaria como su custodio y tutor;

5. QUE la reunificación con el padre del niño no es viable debido al hecho de que el padre no lo ha protegido; ha abandonado al niño y no puede o no quiere cuidarlo en los Estados Unidos;

6. QUE lo más conveniente para este niño es NO ser devuelto a su país de Origen, o de última residencia habitual, ya que allí no hay parientes adecuados u otras personas capaces de proporcionarle cuidado. Si es devuelto a México, es probable que el menor sea objeto de nuevos abusos, negligencia o abandono.

Sobre la base de su conclusión, La peticionaria solicita respetuosamente a la Corte que:

1. ORDENAR que se otorgue la custodia permanente y la tutela del niño a La peticionaria;
2. Para las demás Órdenes que el Tribunal considere necesarias.

FECHA: 9 de enero de 2024

FILLMORE SPENCER LLC

/s/ Laura Lui  
T. Laura Lui  
Abogada de La Peticionadora.

I, JOA TORRES LLOYD, hereby certify that the above is an accurate translation of the original Petition for Guardianship in English and that I am competent in both English and Spanish to render such translation. The Petition for Guardianship has been read to the person in a language that the person understands and that he or she understood it before signing.

DATE: April, 2024

A handwritten signature in black ink, appearing to be "JOA TORRES LLOYD", written over a horizontal line.

Translator's Signature.