

5835

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE
-FAMILY DIVISION-

NATASHA MARIE CERVI,

Plaintiff,

vs.

RICARDO ANTONIO ROSSELLO,

Defendant.

09-105835 DO 5/01/2009
JDG:MARIA L. OXHOLM
CERVI NATASHA MARIE
VS
ROSSELLO RICARDO ANTONIO

Mark S. Papazian (P24110)
Jeffrey J. Franklin (P71589)
GIARMARCO, MULLINS & HORTON, P.C.
Attorneys for Plaintiff
101 W. Big Beaver Rd., 10th Fl
Troy, MI 48084
(248) 457-7000

There is no other pending or
resolved civil action arising out of
the transaction or occurrence
alleged in the complaint.

VERIFIED COMPLAINT FOR ANNULMENT

There is no other pending or resolved civil action arising out of the transaction or occurrence alleged in this complaint.

There is no other pending or resolved action within the jurisdiction of the Family Division of the Circuit Court involving the family or family members of the persons who are the subject of this complaint or petition.

Jeffrey J. Franklin (P71589)

FILED
MAY - 1 2009
M. L. OXHOLM
CLERK

NOW COMES, Plaintiff, NATASHA MARIE CERVI, by and through her attorneys, GIARMARCO, MULLINS & HORTON, P.C., and for her Verified Complaint for Annulment respectfully prays unto this Honorable Court as follows:

1. Plaintiff, NATASHA MARIE CERVI, is currently a resident of Wayne County, and has resided in Wayne County prior to the filing of this Complaint for Annulment.
2. The parties to this litigation were duly and legally married on June 14, 2008 in the City of Detroit, County of Wayne, State of Michigan by a person authorized to perform and solemnize marriages in the State of Michigan.

I May 2009

Jacquetta M. Park
GIARMARCO, MULLINS & HORTON, P.C.
ATTORNEYS AND COUNSELORS AT LAW

Tenth Floor Columbia Center 101 West Big Beaver Road Troy, Michigan 48084-5280 P: (248) 457-7000 F: (248) 457-7001 www.gmhllaw.com

3. Prior to the marriage, Plaintiff's name was and continues to be NATASHA MARIE CERVI.

4. The Plaintiff is not currently pregnant.

5. No children have been born of this marriage.

6. There is property to be divided between the parties.

7. Defendant's representations prior to the entry of this marriage were false and fraudulent. He never intended to live with Plaintiff as husband and wife. In fact, prior to the parties' marriage, Defendant informed his paramour that he had no intentions of remaining married to Plaintiff, and that the two would be getting divorced shortly thereafter.

8. Phone records further indicate that Defendant was having telephone contact with his paramour prior to the parties' wedding and continuing thereafter.

9. Defendant's paramour has contacted Plaintiff and informed her of the facts indicated above.

10. Upon information and belief, Defendant was romantically involved with his mistress for a significant period of time prior to his marriage to Plaintiff, and he continues to be romantically involved with her to date.

11. Defendant had no intentions of respecting the bonds of matrimony, and his desire to marry Plaintiff was only a front to appease his family and further his political career.

12. Despite having no intention to live as husband and wife with Plaintiff, Defendant allowed Plaintiff and her family to financially contribute a significant sum of money to the wedding.

13. Plaintiff was induced into this marriage based upon Defendant's fraud and false pretenses.

14. Immediately upon the discovery of Defendant's fraudulent behavior, Plaintiff ceased cohabitation with the Defendant and returned to her prior home in Michigan, and intends to remain so domiciled.

15. Plaintiff has insufficient funds to afford the expense of this action unless the Court awards attorney fees and costs. Defendant has the ability to pay these fees and costs.

16. Plaintiff desires an annulment pursuant to MCLA 552.2.

WHEREFORE, Plaintiff NATASHA MARIE CERVI, respectfully requests that this Honorable Court grant her the following relief:

- A. Enter Judgment of Annulment dissolving the marriage between Plaintiff and Defendant;
- B. Award Plaintiff attorney fees incurred as a result of the filing of this complaint;
- C. Award an equitable division of the parties assets and liabilities obtained through the duration of, and incident to, the marriage;
- D. Grant any and all other relief that this Honorable Court deems to be fair and equitable under the circumstances.

I declare that the statements above are true to the best of my information, knowledge and belief.


Natasha Marie Cervi

Respectfully submitted,

GIARMARCO, MULLINS & HORTON, P.C.


Mark S. Papazian (24110)
Jeffrey J. Franklin (P71589)
Attorneys for Plaintiff
101 W. Big Beaver Rd., 10th Fl
Troy, MI 48084
(248) 457-7000

Dated: April 30, 2009