IN THE IOWA DISTRICT COURT FOR POLK COUNTY

JUVENILE DIVISION

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| **IN THE INTEREST OF** **,****CHILDREN.** | NO. JVJV\_\_\_\_\_\_APPLICATION FOR ORDER OF TEMPORARY REMOVAL PURSUANT TO IOWA CODE SECTION 232.78 |

**COMES NOW** the State of Iowa, by and through Assistant Polk County Attorney Choose an item., and with the attached Affidavit in Support of the Ex Parte Removal Request prepared by the Iowa Department of Health and Human Services (“HHS”), hereby makes application to the Court for an Order of Temporary Removal pursuant to Iowa Code Section 232.78. In support thereof, the undersigned states as follows:

1. The circumstances surrounding the need for removal are detailed in the attached affidavit.
2. Choose an item.
3. Immediate removal is necessary to avoid imminent danger to the Choose an item. life or health as detailed in the attached affidavit.
4. A petition alleging the Choose an item. to be in need of assistance within the meaning of Iowa Code Section 232.96A Choose an item..
5. There is reasonable cause to believe that physical custody cannot be continued with the person from whom the removal is sought as detailed in the attached affidavit.
6. There is reasonable cause to believe that physical custody cannot be placed with a non-custodial parent as detailed in the attached affidavit.
7. Reasonable efforts have been made to continue the child in the home as detailed in the attached affidavit.
8. Continued placement of the child in the home would be contrary to the Choose an item. welfare as outlined in the attached affidavit.
9. The need for removal due to an imminent risk to the Choose an item. life or health is greater than the potential harm that the removal may cause the Choose an item., including, but not limited to, any physical, emotional, social, or mental trauma as outlined in the attached affidavit.
10. Inquiry regarding Native American heritage has been made as detailed in the attached affidavit.

**WHEREFORE**, the State requests the Court grant the ex parte removal request and issue an order placing the Choose an item. in the custody of the Department of Health and Human Services for Choose an item.

Respectfully submitted,

KIMBERLY GRAHAM

/s/ Choose an item.

Choose an item.

Assistant Polk County Attorney

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