**IN THE IOWA DISTRICT COURT FOR POLK COUNTY**

**JUVENILE DIVISON**

|  |  |
| --- | --- |
| **IN THE INTEREST OF**  **A CHILD.** | **JUVENILE NO.**  **MOTION TO TERMINATE, MODIFY, OR SUBSTITUTE PRIOR ORDER** |

COMES NOW, the State, by and through Assistant Polk County Attorney, , and informs the Court and all parties of the following:

On the \_\_\_\_ day of \_\_\_\_, 2015, a CINA order was entered by the Court directing:

Facts and developments subsequent to that Order:

THEREFORE the undersigned respectfully requests that the Court modify the prior Order as follows:

And that return or continued placement with the mother is contrary to the child’s welfare due to:

Further the undersigned respectfully requests that if the motion results in an out of home placement that the following reasonable efforts have been made to achieve permanency and to prevent or eliminate the need for removal:

**Respectfully Submitted,**

**Kimberly Graham**

**Polk County Attorney**

/s/ *(name)*

NAME

Assistant Polk County Attorney

Juvenile Division

222 5th Avenue

Des Moines, IA 50309