

COPY

**VIRGINIA:**

**IN THE CIRCUIT COURT THE COUNTY OF PRINCE WILLIAM**

Cheri Smith  
Complainant

v.

Wesley C. Smith  
Defendant

Chancery No. 53360

**MOTION FOR SANCTIONS**

**THIS** matter has come before this Court upon the Motion of the Complainant, Cheri Smith, who by counsel, moves this court to impose sanctions upon the Defendant, Wesley C. Smith, because of his failure to pay Child Support as ordered by this Court on October 2, 2003, and his failure to cease and desist from any and all conduct which was prohibited by the Order entered by this Court on September 23, 2004.

In support of her motion, the Complainant states as follows:

1. By an Order entered by this Court on October 2, 2003, Mr. Smith was ordered by this Court to pay child support in the amount of \$823.00 to the Complainant, Cheri Smith.
2. Mr. Smith has failed to pay any of the ordered child support payments since July 2004. The amount which he currently owes is \$17,283.00 which represents 21 months of non-payment of child support beginning with August 1, 2004 and ending May 1, 2006.
3. By the Order of this Court entered by this Court on September 23, 2004, Mr. Smith was ordered to dismantle the website, [www.Liamsdad.org](http://www.Liamsdad.org).
4. Mr. Smith has not only failed to dismantle the website, he has added to it.

**WHEREFORE**, the Complainant requests:

1. that this Court impose sanctions against Mr. Smith for his failure to obey the Court's orders dated October 2, 2003 and September 23, 2004.
2. that the Court order Mr. Smith to pay Mrs. Smith's attorney's fees.
3. that the Court award all of the money remaining from the sale of the marital residence to Mrs. Smith
4. And that the Court impose any other sanctions which it deems appropriate.

I ASK FOR THIS:

Cheri Smith  
By Counsel

Loretta H. Vardy

Loretta Vardy, Esquire  
VSB No. 26225  
12388 Silent Wolf Drive  
Manassas, VA 20112  
Phone: 703-791-6078  
Fax: 703-791-7957  
Counsel for Cheri Smith

**CERTIFICATE OF SERVICE**

This is to certify that on the 19<sup>th</sup> day of May 2006, a true copy of the foregoing Motion for Sanctions was mailed postage prepaid and sent electronically to:

Wesley Smith  
5347 Landrum Rd APT 1  
Dublin, VA 24084

This is to certify that on the 19<sup>th</sup> of May, 2006, a true copy of the foregoing Notice and Motion was hand delivered to the following:

Ronald Fahy, Esq.  
9236 Mosby Street  
Manassas, VA 20110

Loretta H. Vardy  
Loretta Vardy, Esquire