

Attachment 1:

Questions to Ask a Client Who Tells You He's Not the Dad

2014 Child Support Enforcement: Representing Respondents
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1. How old is the child?
2. What is the child's date of birth?
3. Was the child born full-term or was the child born prematurely?
4. Where was the child born (City, State, Country)?
5. What type of relationship do you have with the child right now?
6. How old were you when the child was born?
7. Is your name listed on the child's birth certificate as the father?
8. Did you adopt the child? If so, when?
9. Were you married to the mother when the child was born?
 - a. How long were you married before the child was born?
 - b. Were you separated at the time of the child's birth? How long before the birth did you separate?
 - c. Were you out of the home for any reason before the child's birth (e.g., military deployment, job contract out-of-state, hospitalization, incarceration)? For what period before the child's birth were you out of the home?
 - d. Have you told people the child is yours?
 - e. Is there a divorce decree, child custody order, or visitation order that says you're the father of the child?
 - f. Were you served with the civil complaint for child support?

- g. Did you go to court?
 - h. If you didn't go to court, explain why you didn't go.
10. Did you marry the mother after the child was born?
- a. Did you tell people you were the child's father before you got married?
 - b. Did you marry the mother so the child's parents would be married?
 - c. Have you told people you are a family and the child is your child?
 - d. Is there a divorce decree, child custody order, or visitation order that says you're the father of the child?
 - e. Were you served with the civil complaint for child support?
 - f. Did you go to court?
 - g. If you didn't go to court, explain why you didn't go.
11. Did you file a petition to legitimate the child?
- a. When did you file the petition to legitimate?
 - b. Did you admit that you were the father of the child in the petition to legitimate?
 - c. Was the petition granted?
 - d. Were you served with the civil complaint for child support?
 - e. Did you go to court?
 - f. If you didn't go to court, explain why you didn't go.
12. Did you ever admit to a child support worker that you were the father of the child?
13. Do you remember signing an Affidavit of Parentage?
- a. Where were you when you signed the Affidavit?

- b. Who was with you when you signed the Affidavit?
 - c. Did you sign the Affidavit by your own free will? If not, describe what caused you to sign the Affidavit.
14. Was an Order of Paternity entered?
- a. Were you served with a civil complaint for paternity and child support?
 - b. Did you go to court?
 - c. Did you admit that you were the father in court?
 - d. Did you request a paternity test?
 - e. Did you submit to a paternity test? If so, what were the results?
 - f. If you didn't go to court, explain why you didn't go.
 - g. Did you receive a copy of the Order of Paternity?
15. When did you meet the mother?
16. When did you first have sexual relations with the mother?
17. Did you have ongoing sexual relations with the mother before the child was born?
18. Are there any medical reasons why you believe you could not be the father of this child (e.g., vasectomy, impotence)
19. Has the mother ever told you that you are not the father of the child?
- a. When did she tell you?
 - b. How many times has she told you?
 - c. Did she ever mention that in a letter, email or text? If so, do you still have a copy?
20. What type of relationship do you have now with the mother?

21. Is the mother in agreement with a motion to set aside paternity of the child?
22. Why do you believe you are not the father of the child?
23. When did you first become aware that you were not the father of the child?
24. Has anyone else claimed to be the father of the child?
25. Has paternity testing ever shown that anyone else is the father of the child?
26. Is there anyone that you believe is the father of the child?
27. Have you ever tried to stop the biological father of the child from claiming he was the father
28. Are you currently in the military?
29. Were you deployed on military orders when any orders were entered or after learning that you were not the father of the child?
30. Do you have any court documents or written materials to support any of your answers above?