

Application

pursuant to the Hague Convention of 25 October 1980
on the Civil Aspects of International Child Abduction

The Norwegian Directorate for Children, Youth and Family Affairs
Postboks 2233
3103 Tønsberg
NORWAY

Please complete, print out, and sign this form, and forward the original document to The Norwegian Directorate for Children, Youth and Family Affairs, using the contact information provided to the left. You may provide extra information on a separate piece of paper if necessary. For further information on child abduction, please visit our child abduction web site www.government.no/child-abduction.

1. Application for repatriation/access

Requesting Central Authority	Requested State
Directorate for Children, Youth and Family Affairs	United States
Name of child/ren concerned	Who will reach the age of 16 on (date)
Adeline Lee Høie	03.05.2034
Request for return <input checked="" type="checkbox"/>	Request for Access under Article 21

2. Details of child/ren and parents

2.1 Child 1

Surname	First Names	
Lee Høie	Adeline	
Date of Birth	Place of Birth	Nationality
03.06.2018	Oslo	Norway, USA
Country of habitual residence (immediately before removal)		
Norway	Male	Female <input checked="" type="checkbox"/>

2.2 Child 2 - if you have more than two children, please print out and complete more copies of this page

2.3 Mother

Surname	First Names	
Lee	Mio Jeanne (Korean name is "Mi Jin")	
Date of Birth	Place of Birth	Nationality
05.06.1975	Seoul, Korea	USA (formerly South Korea)
Country of habitual residence	Occupation	

Norway

Business owner

2.4 Father

Surname	First Names	
Høie	Øystein Wærnes	
Date of Birth	Place of Birth	Nationality
08.08.1983	Hammerfest	Norway
Country of habitual residence	Occupation	
Norway	Manager	

2.5 Civil status of the parents

Date and place of marriage	Date and place of divorce
Cohabited 2017-2020. Never married.	N/A

3. Details of applicant (requesting individual or institution)

Surname	First Names	
Høie	Øystein Wærnes	
Date of Birth	Place of Birth	Nationality
08.08.1983	Hammerfest	Norway
Country of habitual residence	Occupation	
Norway	Manager	

Relationship to child

Father

Contact address

Vulkan 10 H0602,

E-mail

oystein.w.hoie@gmail.com

Knowledge of languages

English, Norwegian

Postcode

0178 Oslo

4. Details of legal representative (if any)

Name of attorney

IPG Legal

Contact address

Postcode

E-mail

info@ipglegal.com

Knowledge of languages

English, Korean

Telephone No

+82-2-532-0222

Mobile Telephone No

Fax No

+82-2-6280-0222

5. Details of person to have removed/retained/prevented contact with child and current location of child

Surname	First Names
Lee	Mio Jeanne
Date of Birth	Place of Birth
05.06.1975	Seoul, Korea
Relationship to child	Nationality
Mother	USA (formerly South Korea)
Last known address	Occupation
	Business owner
Middelthunsgate 21A, 0368 Oslo	

Details of location of child

The child was last seen in kindergarten in Oslo, Norway on Thursday Jan 25th, 2024. Her mom then moved her out of their apartment on Friday Jan 26th, taking a plane to Dubai.

The last contact was on a phone call made to the father on Jan 29th. In this phone call she said that she had to urgently leave. This is three months ago. Mom did not inform that she had moved out, neither to father, the kindergarten or her neighbours. Since then it has not been possible to establish contact.

Her Norwegian phone number [REDACTED] is turned off, and she does not reply to emails [REDACTED]

She is a US citizen, as she has revoked her Korean citizenship. Before moving to Norway she lived in Los Angeles for about 20 years. She has friends and a professional circle in this area.

Knowledge of languages

English, Korean

6. Civil court proceedings that are concluded or are in progress – in or outside Norway

The court proceedings concluded in October 12, 2022. The following judgement was sentenced:

The child (Adeline Lee Høie) shall live permanently with her father, Øystein Wærnes Høie
 The child (Adeline Lee Høie) shall have regular visitations with her mother Mio Jeanne Lee, from Mondays in even-numbered weeks until Mondays in uneven-numbered weeks (50 %)

7. Re: Request for return

Date and circumstances of the wrongful removal or retention – including events leading up to the removal/retention of child

On January 26th 2024, the mother cleared out of the apartment in secret and moved with the child without notifying neighbours and kindergarten.

She called from a secret number using number hiding software on January 29th, 2024 to say that they had left, and she has since been unreachable. Neither she nor her family are responding to calls or emails.

The police investigation shows that the mother and the child have been on the move since. On January 26th they flew from Norway to Dubai, and from there to an unknown destination. On March 15th, 2024 they departed from the United States to an unknown location. On June 12th, 2024 they departed from South Korea to an unknown location.

Factual and legal grounds justifying the request

Factual Grounds:

I, Øystein Wærnes Høie, am the father of Adeline Lee Høie. In October 2022, Norway's civil court awarded me permanent custody of Adeline, concluding that her best interests are served by her residing with me.

Despite the court's clear ruling in 2022, Adeline was wrongfully taken out of her home country by her mother, Mio Jeanne Lee. This removal has placed Adeline in a highly unstable environment: She has been on the move for months, without consistent access to early childhood education, and deprived of any contact with me or my family. I am worried that this constant change and isolation are detrimental to her mental and emotional well-being.

Given these circumstances, and the ongoing violation of Adeline's rights and well-being through her wrongful retention in U.S.A., her immediate return to Norway is imperative. This action is necessary not only to restore the lawful and nurturing environment provided by her legal custodian but also to mitigate the psychological and emotional strain imposed by her current unstable living conditions and maternal influence.

Legal Grounds:

The legal basis for this application is anchored in the decision made by Norway's civil court, which holds jurisdiction over Adeline Lee Høie's welfare and custody. The court's ruling not only reflects a deep commitment to Adeline's best interests but also aligns with the principles and objectives of the Hague Convention of 25 October 1980 on the Civil Aspects of International Child Abduction. The Convention aims to protect children from the harmful effects of international abduction and retention, establishing a procedure for their prompt return to the country of habitual residence.

The wrongful removal of Adeline by her mother one year after the court's decision represents a clear violation of the rights of custody established under the law of Adeline's habitual residence. The legal request for Adeline's return is thus grounded in the need to uphold the court's ruling, enforce the Hague Convention's provisions, and prioritize the welfare and best interests of the child amidst international legal frameworks.

Given the breach of the custody arrangement and the subsequent wrongful retention of Adeline, it is imperative to invoke the Hague Convention to facilitate her prompt and safe return, ensuring that the rights of custody and access under the law of the contracting states are effectively respected and implemented.

In light of the court's decision granting me, Øystein Wærnes Høie, the primary custody of my daughter, Adeline Lee Høie, and the subsequent wrongful removal of Adeline, it is my earnest request that all necessary measures be taken to facilitate her prompt and safe return to Norway. The following steps are proposed to achieve this:

Immediate Alert and Cooperation: I request that an immediate alert be issued regarding Adeline's wrongful removal. This should involve cooperation between Norwegian and U.S. authorities, leveraging the Hague Convention's network, to locate Adeline. Given her U.S. citizenship, I believe that U.S. authorities are in a pivotal position to assist in this matter.

Legal Assistance and Coordination: I seek the assistance of the Norwegian Directorate for Children, Youth and Family Affairs (Bufdir), alongside the U.S. Central Authority designated under the Hague Convention, to initiate legal proceedings if necessary, to secure Adeline's return. This process should be expedited to minimize the emotional and psychological impact on Adeline.

Safe and Monitored Return: Once located, I propose that Adeline's return to Norway be arranged through official channels, ensuring her safety throughout the journey. This may include the appointment of a child welfare expert or a social worker to accompany her, ensuring her well-being and addressing any immediate needs she may have during the travel.

Judicial Review upon Return: Upon Adeline's return to Norway, I am open to a judicial review of the custody arrangements, if deemed necessary by the authorities, to reaffirm that residing with me is in her best interests. This would be in line with the initial court ruling and the principles of the Hague Convention.

Supportive Measures for Reintegration: I commit to engaging any required psychological or social support services to assist Adeline in her reintegration process, recognizing the potential trauma associated with her wrongful removal and the transition back to life in Norway.

Ongoing Communication with the Mother: Consistent with the court's decision, and to facilitate a healthy relationship between Adeline and her mother, Mio Jeanne Lee, I am committed to arranging and maintaining a structured visitation schedule, ensuring that their relationship can continue in a manner that best serves Adeline's emotional and developmental needs.

It is my utmost priority to ensure Adeline's swift and secure return to her home in Norway, where her safety, stability, and well-being can be guaranteed. I appeal for the full support and swift action of all involved authorities under the Hague Convention to address this matter with the seriousness and urgency it warrants.

8. Re: Request for access under Article 21

9. List of documents attached

Your should include copies of documents proving your child's habitual residence in Norway (for instance school registration records or records from the Norwegian Population Registry), documents proving you have custody of the child (for instance a court order or an agreement relating to custody or access), and photos of the child and the abductor if possible. Any decision or agreement must be forwarded in original or as an authenticated copy. Other documents should also be forwarded in original or as authenticated copies.