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To the Honorable the Judge of the Sangamon  
Circuit Court in Chancery State,  
Humbly complaining, Sheweth unto your  
Honor, your Petitioner, Alley Bancorn, that  
on the day Feb. 20. A. D. about twenty four  
years ago next February, she was lawfully married  
to one John Bancorn, whom she prays may be  
made a party to this bill as defendant, & that afterwards  
to wit, on the day of A. D. 1830  
she and her said husband removed to & took  
up their residence in the County of Wayne where  
she ~~has since resided for two years & removed from~~  
~~there to Union, Madison County, where they resided six or seven~~  
~~years, & removed from there to Pike County Illinois, where they resided~~  
~~until the day of A. D. 1831. The said full and complete~~  
~~and she has since separated or parted from her said husband~~  
~~without any~~  
~~reasonable cause, & has ever since remained~~  
~~separate~~; & she further sheweth, that from the time of  
her said marriage until the death of her  
said husband as aforesaid, she continued to  
live with her husband, all the time performing  
all the duties of an affectionate and obedient  
wife - She also sheweth that while she & her said  
husband lived together ~~she had seven~~  
~~& that three of said children live with her, to wit, Thomas Shelton, Priscilla~~  
~~to wit, & that from the~~  
~~house, & Union Grove~~  
She has supported & maintained said children  
as since she had them in possession by her own labor, & that  
her said husband never contributed in any way to  
their support; and your Petitioner also sheweth, that her  
said husband, has treated her with violence &  
repeated cruelty, for two years next preceding the  
month of April A. D. 1841  
~~and that her said husband was ever addicted to~~  
~~habitual drunkenness for the period of two years next~~  
~~preceding the time last aforesaid; & your Petitioner~~  
also sheweth, that since the period last aforesaid, to wit,  
on the day of Sept. August 2. 1841 she

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removed to the County of Sangamon and State of  
 Illinois, and your Orator prays that during the month of  
 April A.D. 1841, she separated from her husband, who had repeatedly threatened  
 to take her life, because she was afraid for her children & herself, & for  
 his credit & health, that he would take her, & he has since repeatedly threatened to  
 take her life since said separation, & she is afraid of the same, & she has  
 in said County of Sangamon, near Ottawa  
 prays that the People's Court of Sangamon aforesaid, and  
 that the said defendant be required to answer on  
 his corporate oath, all & singular the allegations  
 of this bill; & that on a final hearing  
 of this cause, your Honor will decree that  
 the bond of matrimony, hitherto and now existing  
 between said defendant, & your Orator be  
 forever dissolved, & that your Orator be  
 decreed to have the care & custody of her  
 said children, & that your Honor will grant  
 such other & further relief, as equity may  
 require, & as in duty bound &

her  
 Attorney General      Joseph L. Cook  
 Mark                      Plaintiff  
 Robert B. Bissell  
 At for the Plaintiff

Subscribed & sworn to  
 before me this 13<sup>th</sup> day  
 of September A.D. 1841  
 Nathaniel Clark