

**Kaminski v. Madrigal, No. 68704, Order of Reversal and Remand (Unpublished  
Disposition April 11, 2016)  
COA Unpub**

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The divorce decree did not include any findings with regard to why awarding primary physical custody to respondent would be in the child's best interest or why the court was granting respondent's motion to relocate.

Even though the Judge made oral findings on these issues, the Decree needed to recite the same.