App. No. ___-_____

In the Supreme Court of the United States

SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH, CATHOLIC SOCIAL SERVICES,

Applicants,

v.

CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS,

Respondents.

APPENDIX OF EXHIBITS

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Dated: July 31, 2018

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CERTIFICATE OF SERVICE

As required by Supreme Court Rule 29.5, I, Mark L. Rienzi, a member of the Supreme Court Bar, hereby certify that one copy of the attached was served via electronic mail July 31, 2018 and by first-class United States Postal Service mail on July 31, 2018 on:

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Date: July 31, 2018

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EXHIBIT 1

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

July 17, 2018
CCO-096-E

No. 18-2574

SHARONELL FULTON; CECELIA PAUL;
TONI LYNN SIMMS-BUSCH;
CATHOLIC SOCIAL SERVICES,
Appellants

v.

CITY OF PHILADELPHIA; DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA; PHILADELPHIA COMMISSION ON HUMAN RELATIONS

(E.D. Pa. No. 2-18-cv-02075)

Present: CHAGARES, GREENAWAY, JR., and FUENTES, Circuit Judges

1. Emergency Motion by Appellants for Fed. R. App. P. 8 Injunction Pending Appeal;

2. Response by Appellees to Emergency Motion for Fed. R. App. P. 8 Injunction Pending Appeal;

3. Reply by Appellant in Support of Motion for Fed. R. App. P. 8 Injunction Pending Appeal.

Respectfully,
Clerk/tmm

_____ORDER_____

The foregoing motion is denied.

By the Court,

s/Joseph A. Greenaway, Jr.
Circuit Judge

Dated: July 27, 2018

tmm/cc: Stephanie H. Barclay, Esq.
Nicholas R. Reaves, Esq.
Mark L. Rienzi, Esq.
Lori H. Windham, Esq.
Eleanor N. Ewing, Esq.
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Leslie Cooper, Esq.
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EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARONELL FULTON, et al.,	:	
	:	
Plaintiffs,	:	**CIVIL ACTION**
	:	
v.	:	**NO. 18-2075**
	:	
CITY OF PHILADELPHIA, et al.,	:	
	:	
Defendants.	:	

MEMORANDUM

Tucker, J. **July 13, 2018**

The gratitude we owe to all those working to better the lives of Philadelphia's most vulnerable children is too great to convey in words. While our gratitude is ultimately ineffable, the Court still begins by recognizing the Parties in this case for their many years of sacrifice and labor. The Court thanks Sharonell Fulton, Cecelia Paul, Toni Lynn Simms-Busch, Catholic Social Services ("CSS"), the City of Philadelphia, the Department of Human Services ("DHS"), and the Commission on Human Relations for their individual sacrifices and contributions in service of Philadelphia's children and its families. As witnesses called to testify in this case have made clear, fostering children is challenging work, but challenging work that can form part of a full and good life.

Until recent events, the Parties have had a fruitful relationship; a relationship that has benefited Philadelphia's children in immeasurable ways. For this reason, the Court would prefer that the Parties seek out some compromise to their current dispute without court intervention. Creative problem solving through concerted and thoughtful discourse without court intervention is often the best method to avoid what may appear to the parties, or to other persons in the public, to be harsh legal results. Still, when parties place a matter before the Court, the Court

must act pursuant to its obligations under the law. Accordingly, the Court turns to the legal matter presented in this case.

Before the Court are Plaintiffs' Motion For A Temporary Restraining Order And Preliminary Injunction ("Injunction Motion") (ECF No. 13),[1] The City Of Philadelphia's Memorandum Of Law In Opposition To Plaintiffs' Motion For Temporary Restraining Order And Preliminary Injunction (ECF No. 21), Proposed Intervenors' Memorandum of Law, Or, In The Alternative, Amicus Brief, In Opposition To Plaintiffs' Motion For A Temporary Restraining Order And Preliminary Injunction ("Amicus Brief") (ECF No. 34); [2] Defendants' Proposed Findings Of Facts And Conclusions Of Law (ECF No. 45), and Plaintiffs' Proposed Findings Of Fact And Conclusions of Law (ECF No. 46). Upon careful consideration of the foregoing and all the evidence presented by the Parties in their written submissions and the evidentiary hearing held on June 18, 2018, June 19, 2018, and June 21, 2018, for the reasons explained below, Plaintiffs' Injunction Motion (ECF No. 13) is **DENIED**.

I. PROCEDURAL BACKGROUND

On May 17, 2018, Plaintiffs asserted sixteen causes of action against Defendants related to, among other things, Defendants' suspension of referrals of new children to Plaintiffs' care and Defendants' alleged violations of Plaintiffs' religious and free speech rights. *See generally*

[1] On June 7, 2018, Plaintiffs filed an Amended Motion for Temporary Restraining Order and Preliminary Injunction because of the Parties' concern that the initial Motion may not have adequately protected the privacy interests of certain minor children identified in the initial Motion. *See* Jun. 20, 2018 Order, ECF No. 32 (dismissing as moot and sealing the initial Motion). Accordingly, unless otherwise noted, the Court's references to the Injunction Motion are references to Plaintiffs' Amended Motion for Temporary Restraining Order and Preliminary Injunction (ECF No. 13).

[2] On June 18, 2018, the Court accepted the Intervenors' Opposition Brief as an amicus brief. The Court's acceptance of the Amicus Brief is memorialized by order dated June 20, 2018. Jun. 20, 2018 Order, ECF No. 33.

Compl., ECF No. 1; *but see* Mem. of Law Supp. Pl.s' Injunction Mot. 8 (asserting that CSS "filed a complaint in this Court on May 16, 2018"). Nineteen days later,[3] on June 5, 2018, Plaintiffs filed their Injunction Motion seeking a court order to compel Defendants to resume referrals of children to Plaintiffs' care in advance of the June 30 expiration of Plaintiffs' current services contract with Defendants under which Plaintiffs provide various professional services in exchange for public funds. In view of the urgency of the matter, the Court set an expedited briefing schedule and ordered an evidentiary hearing. Jun. 6, 2018 Order, ECF No. 11. Less than two weeks later, on June 18, 2018, the Court held an evidentiary hearing. The hearing concluded on June 21, 2018.[4]

[3] If the Court accepts Plaintiffs' asserted date of May 16, 2018 as the filing date for the Complaint, then Plaintiffs' Injunction Motion was filed twenty days after first filing suit.

[4] During the evidentiary hearing, testimony by James Amato, Secretary and Executive Vice President of CSS, revealed that it is CSS policy to refuse to certify any prospective foster parent without a "clergy letter" from a religious minister. *See* Jun. 19, 2017 Hearing Tr. 34–35 (Amato) (testifying to Amato's title and responsibilities at CSS); Jun. 19, 2017 Hearing Tr. 95–96 (Amato) (explaining that a clergy letter is required for certification by CSS because the letter "is a very good indication of [a prospective foster parent's] commitment to their faith" and explaining that CSS will not, to Amato's knowledge, certify a prospective resource parent without a clergy letter). While the religious affiliation of the minister writing the clergy letter does not matter, Amato explained that the receipt of a clergy letter on behalf of a prospective foster parent is an absolute condition to CSS's certification of that prospective foster parent. Jun. 19, 2017 Hearing Tr. 95:12–16, 95:21–23 (Amato). It appears, therefore, that CSS will not certify prospective foster parents who are religious but whose religious exercise does not include a relationship with a minister, prospective foster parents who choose not to associate with any religious tradition, or prospective foster parents who associate with a religious tradition that does not have religious ministers willing or able to provide a clergy letter.
This evidence is disconcerting to the Court because it raises serious constitutional as well as contractual questions. Among other things, this policy appears to contravene CSS's contractual obligations under its contract with DHS under Section 4.1(k). Section 4.1(k) prohibits CSS from discriminating against individuals based on the individuals' religious beliefs. Section 4.1(k) provides that CSS:

> shall inform all individuals to whom Services are provided, whether directly or indirectly, of the following: "The Philadelphia Department of Human Services' selection of a faith-based provider

II. FACTUAL BACKGROUND[5]

A. CSS's Services Contract With DHS And Philadelphia

It is an intractable tragedy that children in our community are sometimes unable to remain in their own homes. Pennsylvania has, in response to this tragic reality, charged individual county agencies with the duty of establishing a system to address the well-being of these children consistent with the best interests of each child. Jun. 19, 2018 Hr'g Tr. 152:18–24 (Figueroa). In Philadelphia County, the county agency charged with this duty is DHS. In performing its duty, DHS contracts with a number of private foster care agencies. Jun. 18, 2018 Hr'g Tr. 87:2–4 (Ali). Presently, DHS has contracts with thirty private foster care agencies. Jun. 19, 2018 Hr'g Tr. 155:14–16 (Figueroa). Each of these private foster care agencies is expected to provide foster care services consistent with a services contract with DHS. *See, e.g.*, Jun. 19, 2018 Hr'g Tr. 162:2 – 12 (Figueroa) (indicating that CSS's services, as a foster agency, are provided under contract with DHS and Philadelphia); Jun. 21, 2018 Hr'g Tr. 12:15–16

> of social services is not an endorsement of the Provider's religious character, practices or beliefs. No Provider of social services may discriminate against you on the basis of religion, a religious belief or your refusal to actively participate in religious practices."

Decl. of James Amato Ex. B, ECF p. 29 of 39, ECF No. 13-4. Indeed, on June 25, 2018, Counsel for CSS delivered a letter to the Court representing that CSS "will agree not to require pastoral letters." Letter from Mark Rienzi, Attorney for Plaintiffs, to Chambers of Judge Petrese B. Tucker (Jun. 25, 2018), ECF No. 40.

Still, as the questions CSS's pastoral letter requirement poses are not squarely before the Court, the Court will, for purposes of the Injunction Motion, refrain from further discussion of the matter.

[5] The following findings of facts are set forth pursuant to Fed. R. Civ. P. 52(a)(2) (requiring that "[i]n granting or refusing an interlocutory injunction, the court must [] state the findings and conclusions that support its action.").

(Figueroa) (indicating that Bethany Christian Services, another foster agency, has a contract similar to the services contract between DHS and CSS).

In November 2015, DHS and CSS entered into Contract Number 16-20030 ("Services Contract") for certain professional services. Decl. of James Amato Ex. A, ECF p. 13 of 52, ECF No. 13-3 (showing that the original contract was executed in November 2015 and recounting the various amendments since initial execution); *see also* Decl. of James Amato Ex. A, ECF p. 39 of 52, ECF No. 13-3 (identifying the Services Contract as a "Professional Services Contract . . . for Department of Human Services Contracts"). As provided in the Statement of Purpose section of the Services Contract, the Services Contract was:

> made and entered into between Catholic Social Services (the Provider) and the Philadelphia Department of Human Services (DHS), and sets forth the services for general, kinship, and teen parent/baby resource home care.

Decl. of James Amato Ex. A, ECF p. 27 of 52, ECF No. 13-3. Under the Scope of Services section of the Services Contract, CSS was to ensure that, among other things, resource caregivers (foster parents) would be "screened, trained, and certified by the Provider [CSS]."[6] Decl. of James Amato Ex. A, ECF p. 28–29 of 52, ECF No. 13-3. The Services Contract reiterates that "[t]he specific issue to be addressed by [CSS] is to recruit, screen, train, and provide certified resource care homes." Decl. of James Amato Ex. A, ECF p. 28 of 52, ECF No. 13-3.

CSS was to provide the services set forth under the Scope of Services section of the Services Contract in accordance with certain criteria, including criteria under Section 3.21 of the

[6] Certification of prospective foster parents requires a licensed foster family care agency to evaluate prospective foster parents using the criteria set forth under 55 Pa. Code § 3700.64. *See e.g.*, *Hinnerschitz v. Dep't of Pub. Welfare*, No. 1977 C.D.2014, 2015 WL 5457824 (Pa. Commw. Ct. 2015) (not precedential) (concluding that Berks County Children and Youth Services' denial of prospective foster parents' application to become kinship foster parents was appropriate given the lower administrative courts' proper consideration of the § 3700.64 factors).

Services Contracts' General Provisions and Article XV: Additional Representations and Covenants of Provider Relating to Certain Applicable Laws.

Section 3.21 limits the reasons that CSS may refuse to provide the services required under the Services Contract. Section 3.21 provides that CSS:

> shall not reject a child or family for Services based upon the location or condition of the family's residence, their environmental or social condition, or for any other reason if the profiles of such child or family are consistent with Provider's Scope of Services or DHS's applicable standards as listed in the [Services Contract], unless an exception is granted by the Commissioner or the Commissioner's designee, in his/her sole discretion.

Decl. of James Amato Ex. B, ECF p. 14 of 39, ECF No. 13-4.

Article XV of the Services Contract further limits the reasons that CSS may refuse to provide the services required under the Services Contract by incorporating into the Services Contract various laws, ordinances, regulations, and executive orders. In particular, Article XV incorporates provisions of the Philadelphia Fair Practices Ordinance relating to non-discrimination and serving all-comers who might seek services from CSS. Article XV stipulates that:

> . . . . Provider further represents, warrants and covenants that . . . Provider is in compliance with the laws, ordinances, regulations and executive orders described below.
>
> 15.1 Non-Discrimination; Fair Practices. This Contract is entered into under the terms of the Charter, the Fair Practices Ordinance (Chapter 9-1100 of the Code) . . . . Provider shall not discriminate or permit discrimination against any individual because of race, color, religion or national origin. Nor shall Provider discriminate or permit discrimination against individuals in . . . public accommodation[7] practices whether by direct or indirect practice of

[7] The term "public accommodation" is defined under the Philadelphia Fair Practices Ordinance as:

> exclusion, distinction, restriction, segregation, limitation, refusal, denial, differentiation or preference in the treatment of a person on the basis of . . . sex, sexual orientation, gender identity, marital status, familiar [sic] status . . . or engage in any other act or practice made unlawful under the Charter . . . .

Decl. of James Amato Ex. C, ECF p. 18–19 of 39, ECF No. 13-5 (emphasis added). In the event of CSS's breach of its covenant under Article XV, DHS and Philadelphia would be permitted "in addition to any other rights or remedies available under this Contract, at law or in equity, [to] suspend or terminate this Contract forthwith." Decl. of James Amato Ex. C, ECF p. 19 of 39, ECF No. 13-5.

In exchange for "the Services and Materials being provided under" the Services Contract, DHS and Philadelphia agreed to "set the amount of compensation payable to [CSS] for the current contract term at [$19,430,999.00]." Decl. of James Amato Ex. A, ECF p. 15 of 52, ECF No. 13-3. Despite this lump sum amount, as a matter of practice, payment to CSS was made on a per diem basis pegged to the number of children under its care. *See* Jun. 21, 2018 Hr'g Tr. 11:4–7 (Figueroa) (testifying that many contractors are paid on a per diem basis); Jun. 21, 2018 Hr'g Tr. 139:20–24 (same) (Figueroa). That CSS was receiving significant public funds to perform its public service functions under the Services Contract is underscored by Section 3.30 of the General Provisions that provides "[CSS] shall identify the Department as a funding source in all literature, documents[,] reports or pamphlets which Provider publishes develops or

> Any [] provider, whether licensed or not, which solicits or accepts patronage or trade of the public or whose . . . services, facilities . . . are extended, offered [] or otherwise made available to the public; including all . . . services provided by any public agency or authority; any agency, authority or other instrumentality of . . . the City, its departments, boards and commissions.

Philadelphia Fair Practices Ordinance § 9-1102 (Definitions) at 4, Chapter 9-1100 of the Philadelphia Code.

produces in connection with this Contract." Decl. of James Amato Ex. B, ECF p. 21 of 39, ECF No. 13-4.

CSS and DHS proceeded under the Services Contract without dispute until March 2018, when DHS learned that it is CSS policy to not serve all-comers. In particular, it is CSS policy to refuse service to same-sex couples CSS services under the Services Contract.

B. March 2018: DHS Learns Of CSS's And Another Foster Agency's Refusal To Comply With Services Contract's All-Comers Provisions

On or about March 9, 2018, DHS Commissioner Figueroa came to believe that two of the foster care agencies with which DHS contracts, CSS and Bethany Christian Services, have policies that deny their publicly-funded services to married same-sex couples. Jun. 21, 2018 Hr'g Tr. 3 (Figueroa) (testifying that on March 9, 2010, a reporter contacted Figueroa and that Figueroa's discussions with the reporter led Figueroa to believe that CSS and Bethany Christian Services had certain policies of refusing service to same-sex couples). Jun. 19, 2018 Hr'g Tr. 164 (Figueroa). Commissioner Figueroa formed this belief after discussions with a *Philadelphia Inquirer* reporter who called Figueroa seeking comment ahead of the publication of an article on two DHS foster care agencies that reportedly maintained policies that would effectively permit these agencies to refuse services to same-sex couples. Jun. 19, 2018 Hr'g Tr. 164 (Figueroa). After Commissioner Figueroa's discussion with the reporter, Figueroa contacted Bethany Christian Services, CSS, various DHS's faith-based foster care agencies, and a nonfaith-based agency to determine what those agencies' policies are in connection with serving same-sex couples. Jun. 19, 2018 Hr'g Tr. 164:16–165:4 (Figueroa); Jun. 21, 2018 Hr'g Tr. 103:6–9 (testifying that Figueroa contacted a nonfaith-based foster care agency).

Commissioner Figueroa's phone call with James Amato at CSS provided greater clarity regarding what services CSS refused to provide to same-sex couples and why CSS refused to

provide those services. Jun. 21, 2018 Hr'g Tr. 3:18–24 (Figueroa). James Amato explained that there were two services that CSS would not provide to same-sex couples: (1) CSS would not certify same-sex couples as prospective foster parents even if the couples were otherwise eligible foster parents under state regulations, and (2) CSS would not provide a same-sex couple with a home study as part of a same-sex couple's application for adoption. Jun. 21, 2018 Hr'g Tr. 3:18–24 (Figueroa); *see also* Jun. 19, 2018 Hr'g Tr. 55:7–20 (Amato) (testifying that Commissioner Figueroa and another DHS officer asked Amato whether CSS would complete a home study for "a same-sex couple or individual" and that Amato confirmed that CSS would not complete such a home study for a couple and would only provide a home study for an individual if that individual was committed to living single). Amato explained that CSS would not provide these services on religious grounds. Jun. 21, 2018 Hr'g Tr. 3:18–24 (Figueroa). Amato recalled that DHS "said to me that you are discriminating. I said that I am following the teachings of the Catholic Church." Jun. 19, 2018 Hr'g Tr. 55:22–25 (Amato).

On March 13, 2018, the *Philadelphia Inquirer* published an article titled Two Foster Agencies in Philly Won't Place Kids with LGBTQ People.[8] The article recounted an incident in which a married same-sex couple traveled to a Bethany Christian Services informational event for prospective foster parents. On arrival, a Bethany Christian Services employee told the couple their attendance at the event would be a waste of time because Bethany Christian Services maintained a policy of refusing to serve same-sex couples. *See also* Jun. 19, 2018 Hr'g Tr. 164:5–10 (Figueroa). In the same story, the *Inquirer* reported that a representative for CSS confirmed that CSS maintained similar policies of refusing to serve same-sex couples.

[8] Julia Terruso, Two Foster Agencies in Philly Won't Place Kids with LGBTQ People, Philly.com (Mar. 13, 2018, 9:05 AM), http://www.philly.com/philly/news/foster-adoption-lgbtq-gay-same-sex-philly-bethany-archdiocese-20180313.html.

On March 15, 2018, after meeting with James Amato and CSS's legal counsel in person, Commissioner Figueroa "decided that it was in the best interest [of children] to close intake, so that [Figueroa] could look more deeply into" CSS's and Bethany Christian Services's policies. Jun. 19, 2018 Hr'g Tr. 166:6–21 (Figueroa); Figueroa Decl. ¶ 32, ECF No. 20-6; *see also* Jun. 18, 2018 Hr'g Tr. 96:2–3 (Ali) (testifying that, to Ali's knowledge, Commissioner Figueroa herself decided to close CSS's intake of new referrals). That day, Philadelphia City Council separately passed its own resolution authorizing the Committee on Public Health and Human Services to "investigate [DHS] policies on contracting with social services agencies that either discriminate against prospective LGBTQ foster parents and allow non-LGBTQ foster parents to discriminate against children." City Council Resolution No. 180252 at 2, ECF No. 10-9.

On March 27, 2018, Deputy Commissioner Ali emailed various community umbrella agencies—responsible for case management activities—to communicate that foster agencies should "refrain from making any foster care referrals to Bethany Christian Services and [CSS]," but "[i]f you have questions about a case, please contact me by phone or email." Ex. 1-E 3, ECF No. 10-12. Deputy Commissioner Ali further communicated that DHS is:

> Committed to the safety and stability of children in our care and must consider the needs of the children and youth ***currently*** served by foster families licensed by these organizations. Our goal is to minimize placement disruptions, and to ensure that a child's ability to reunify or to continue an adoption process is not delayed because of placement disruption.

Ex. 1-E 3, ECF No. 10-12.

C. Doe Foster Child #1

Plaintiffs spent some time at the evidentiary hearing exploring a situation involving a minor child identified as Doe Foster Child #1. Plaintiffs point to the situation involving Doe Foster Child #1 as an "example of the harm that has resulted from the City's intake closure."

Pls.' Proposed Findings of Fact and Conclusions of Law 27, ECF No. 46. The circumstances surrounding Doe Foster Child #1 are, as is often the case for children in foster care, complex. The Court notes, however, that by the time of the evidentiary hearing, DHS and CSS, working together, successfully obtained a Philadelphia Family Court order permitting Doe Foster Child #1's removal from a different living situation and then placement with a CSS-certified foster parent. Ali Decl. ¶ 60, ECF No. 20-1. Through the concerted efforts of DHS and CSS staff, the situation involving Doe Foster Child #1 is now resolved.

Still, Plaintiffs contend that the situation with Doe Foster Child #1 would not have occurred but for DHS's closure of CSS's intake of new referrals, while DHS and Philadelphia contend that Doe Foster Child #1's unique situation was resolved in a timely manner considering the complexity of the case. As a factual matter, the situation with Doe Foster Child #1 is unlikely to occur again given that DHS and CSS are both now fully aware that exemptions from the intake closure have been and continue to be granted consistent with the best interests of individual children. *See, e.g.*, Jun. 19, 2018 Hr'g Tr. 84:2–9 (Amato) (testifying that he is aware that DHS will grant exceptions in some cases for placements with Catholic Social Services when such placements are in the best interests of the child); Jun. 19, 2018 Hr'g Tr. 86:8 – 11 (Amato) (testifying that CSS has, in fact, sought out and received placements for children despite the intake closure when placements were in the best interests of the child).

D. Current Effects Of Closure Of CSS Intake Of New Referrals

In response to Plaintiffs' claims that CSS's intake closure has and will continue to negatively affect foster children, DHS offered evidence showing that the closure of CSS's intake of new referrals has had little or no effect on the operation of Philadelphia's foster care system. DHS Commissioner Figueroa testified that CSS's intake closure "has not resulted in a rise in

children placed in congregate care."[9] Jun. 21, 2018 Hr'g Tr. 86:4–87:9 (Figueroa). Further, Figueroa testified that CSS's intake closure "has not resulted in a rise in children staying in DHS's childcare room." Jun. 21, 2018 Hr'g Tr. 86:4–87:9 (Figueroa). Figueroa's testimony was based on her review of "weekly data" that Figueroa receives from DHS's "performance and technology team that . . . have . . . detailed data." Jun. 21, 2018 Hr'g Tr. 86:16–87:11 (Figueroa).

That the effects of closing CSS's intake have been small relative to size and breadth of the Philadelphia foster care system is, unfortunate, but unsurprising given Commissioner Figueroa's explanation that:

> Kids are abused every day. They are neglected every day. They end up in [DHS's] placement, in [DHS's] care, because their families can't care for them. We are incredibly fortunate that we have foster care agencies, but it's not a one to one.

Jun. 21, 2018 Hr'g Tr. 93:23–94:7 (Figueroa). The number of cases and idiosyncrasies of each child involved in each case means that the mere fact that there are empty, available foster homes does not equate to fewer children in congregate care. Figueroa explained that assuming that "availability [at any one foster agency] [will] reduce the [use of] congregate care is an over [simplification] of the complication of our work." Jun. 21, 2018 Hr'g Tr. 93:23–94:7 (Figueroa). That the negative effects of closing CSS's intake have been relatively slight is also supported by the reality that, as of the evidentiary hearing date, at least three foster agencies had intake closures in place and the foster system nevertheless remained stable. *See* Jun. 21, 2018 Hr'g Tr. 5:14–15 (Figueroa) (testifying that "I have closed intake in other circumstances for other providers."); Jun. 21, 2018 Tr. 8:24-25–9:1 (Figueroa) (testifying that the week before, DHS also

[9] Congregate care is a broad term used to describe a variety of "nonfamily-like [foster care] settings." Jun. 18, 2018 Hearing Tr. 93:6 (Ali).

closed intake for another agency); Jun. 21, 2018 Hr'g Tr. 12:9–21 (Figueroa) (testifying that Bethany Christian Services's intake remained closed as of June 21).

E. Defendants' Preference To Continue Work With CSS And Offer Of New Contracts

DHS and Philadelphia have explicitly stated a preference for continuing their relationship with CSS, despite CSS's religious nature, so long as CSS complies with its contract responsibilities. *See, e.g.*, Jun. 21, 2018 Hr'g Tr. 9:18–24 (Figueroa) (indicating that DHS would prefer to continue contracting with CSS); Jun. 19, 2018 Hr'g Tr. 120:7 – 11 (Amato) (testifying that DHS and Philadelphia were clear that they did "not plan to agree to any further referrals to CSS . . . absent assurances that CSS is prepared to adhere to contractual obligations). Indeed, DHS and Philadelphia manifested their preference to continue working with CSS by offering CSS two different renewal services contracts. *See, e.g.*, Jun. 21, 2018 Hr'g Tr. 10:1–10 (Figueroa). The first contract would be a renewal on the same terms as CSS's current Services Contract. The second contract would be an alternate services contract to provide financial support to CSS even if CSS could not agree to certify same-sex couples consistent with the all-comers provisions of the standard services contract . *See, e.g.*, Jun. 21, 2018 Hr'g Tr. 10:5–10. Such alternate contracts have been provided to other foster care agencies in the past to ensure the best interest of foster children. *See, e.g.*, Jun. 21, 2018 Hr'g Tr. 10:20–11:16 (Figueroa). That Defendants have offered two contracts to CSS despite the Parties' present dispute shows Defendants' strong desire to keep CSS as a foster care agency.

III. STANDARD OF REVIEW

A. Temporary Restraining Order and Preliminary Injunctive Relief Factors

A preliminary injunction is "an extraordinary remedy never awarded as of right." *Groupe SEB USA, Inc. v. Euro-Pro Operating LLC*, 774 F.3d 192, 197 (3d Cir. 2014) (citing

Winter v. Natural Res. Def. Council, Inc., 555 U.S. 7, 24 (2008)). Preliminary injunctive relief is appropriate only "upon a clear showing that the plaintiff is entitled to such relief." *Id.* (citing *Winter*, 555 U.S. at 22). Ultimately, "the decision to grant or deny a preliminary injunction is committed to the sound discretion of the district court." *United States v. Price*, 688 F.2d 204, 210 (3d Cir. 1982) (citing *Stokes v. Williams*, 226 F. 148, 156 (3d Cir. 1915)). In deciding whether to grant injunctive relief, the Court must consider whether: (1) Plaintiffs have demonstrated a likelihood of success on the merits; (2) Plaintiffs will be irreparably harmed by the denial of injunctive relief; (3) the balance of equities favors Plaintiffs; and (4) the public interest favors granting the injunction. *See, e.g.*, *Del. Strong Families v. Att'y Gen. of Del.*, 793 F.3d 304, 308 (3d Cir. 2015).[10]

The Third Circuit has explained that the first two factors of this analysis—likelihood of success on the merits, and irreparable harm—act as "gateway factors." *Reilly v. City of Harrisburg*, 858 F.3d 173, 180 (3d Cir. 2017). Accordingly, when confronted by a motion for preliminary injunctive relief, a court must first determine whether the movant has met these two gateway factors before considering the remaining two factors—balance of harms, and public interest. *Id.* at 179. In short, "[i]f these gateway factors are met, a court then considers the remaining two factors and determines in its sound discretion if all four factors, taken together, balance in favor of granting the requested preliminary relief." *Id.*

Esteemed jurists have acknowledged that the existence of complex questions of law and disputed matters of fact at the preliminary injunction phase of a case may create "doubt about the probability of [a] plaintiff's success to justify denying a preliminary injunction." *Transcon. Gas*

[10] The standard for issuing a temporary restraining order is the same as that for ordering a preliminary injunction. *Ride the Ducks, LLC v. Duck Boat Tours, Inc.*, No. CIV. A. 04-CV-5595, 2005 WL 670302, at *4 (E.D. Pa. Mar. 21, 2005).

Pipe Line Co. v. Permanent Easements for 2.14 Acres & Temp. Easements for 3.59 Acres in Conestoga Twp., Lancaster Cty., Pa., No. 5:17-CV-00715, 2017 WL 1283948, at *5 (E.D. Pa. Apr. 6, 2017) (citing *St. John of Jerusalem-Knights of Malta v. Messineo*, 572 F. Supp. 983, 990 (E.D. Pa. 1983)). Indeed, in *Transcon. Gas Pipe Line Co.*, the district court collected a number of cases supporting this general proposition. 2017 WL 1283948, at *5 (citing *La Chemise Lacoste v. General Mills, Inc.*, 53 F.R.D. 596, 605 (D. Del. 1971) for the proposition that "[a] Court should not decide doubtful and difficult questions on a motion for a preliminary injunction."); *see also id.* (citing *Coffee Dan's, Inc. v. Coffee Don's Charcoal Broiler*, 305 F. Supp. 1210, 1213 (N.D. Cal. 1969) for the proposition that "[o]n an application for a preliminary injunction the court is not bound to decide doubtful and difficult questions of law or disputed questions of fact.").

Although there exists, in this case, a myriad of complex questions of law and a great number of disputed facts such that the Court could justifiably deny injunctive relief on these grounds alone, the Court nevertheless engages in the preliminary injunction analysis below to ensure that the reasons for the Court's decision are sufficiently articulated for the Parties.

IV. DISCUSSION AND CONCLUSIONS OF LAW[11]

A. Factual Precedent: Faith-Based Foster Agencies In Other Jurisdictions

At the outset, the Court notes that while precise legal precedent on the issues raised in this case is absent, there exists some factual precedent. In 2006, for example, in the wake of Massachusetts's legalization of same-sex marriages, Catholic Charities in Boston shut down its

[11] The following discussion and conclusions of law are set forth pursuant to Fed. R. Civ. P. 52(a)(2).

foster care agency after it unsuccessfully sought permission from Massachusetts to withhold its services from legally married same-sex couples.[12]

In 2010, Catholic Charities in Washington, DC, like Catholic Charities in Boston, ended its foster care program in response to Washington, DC's legislation to legalize same-sex marriage.[13] As a result, "Catholic Charities' caseload of 43 children and 35 foster families was transferred, along with seven staffers, to the Bethesda, Md.-based National Center for Children and Families so as not to disrupt client care."[14]

In 2011, Catholic Charities in Illinois sued, among others, the State of Illinois after the State indicated that it would not renew its foster care contract with Catholic Charities because Catholic Charities' "failure to provide services to unmarried cohabiting couples was in direct violation of" state law. Summary Judgment Order 2, *Catholic Charities of the Diocese of Springfield v. Madigan*, No. 2011-MR-254 (Ill. Cir. Ct. Aug. 18, 2011). The Sangamon County Circuit Court granted the State's Cross Motion for Summary Judgment on grounds that Catholic Charities had no cognizable right to a state government services contract. The court reasoned that Catholic Charities did "not have a legally recognized protected property interest in the renewal of its contracts for foster care and adoption services . . . . [and] [t]he fact that [Catholic Charities] have contracted with the State to provide foster care and adoption services for over forty years does not vest the Plaintiffs with a protected property interest." *Id.* After the Sangamon County Circuit Court's decision, Catholic Charities in Illinois ended its foster care

[12] Patricia Wen, Catholic Charities Stuns State, Ends Adoptions, boston.com (Mar. 11, 2006), http://archive.boston.com/news/local/articles/2006/03/11/catholic_charities_stuns_state_ends_adoptions/.
[13] Julia Duin, Catholics End D.C. Foster-Care Program, (Feb. 18, 2010), https://www.washingtontimes.com/news/2010/feb/18/dc-gay-marriage-law-archdiocese-end-foster-care/.
[14] *Id.*

and adoption services and agreed to transfer "more than 1,000 foster care children and staff to other agencies in their regions."[15]

In 2006, in contrast to the decisions by Catholic Charities in Boston, Washington, DC, and Illinois to end its foster care services, Catholic Charities in San Francisco chose to end its full service adoption agency to avoid providing services to same sex couples, but otherwise planned to "provide staff and financial resources to connect needy children to adoptive parents," and formally collaborate with other adoption agencies who can provide full services to all-comers without violating San Francisco's anti-discrimination efforts. [16]

Against this backdrop, the Court turns to the Parties' legal arguments.

B. Services Contract Requires Contractors To Provide Services Consistent With Fair Practices Ordinance

1. The Unambiguous Terms Of The Services Contract Evinces The Parties' Intent That The Fair Practices Ordinance Apply To CSS's Services

As a threshold matter, the Parties disagree on whether the Services Contract requires CSS to provide its services to all-comers in accordance with the Fair Practices Ordinance because such services may or may not constitute a "public accommodation." While briefing on this issue is scant, the Parties expended significant time arguing this issue at the evidentiary hearing. *See,e.g.*, Jun. 18, 2018 Hr'g Tr. 9:17–12:14 (Plaintiffs' Opening Statement); *see also* Pls.' Proposed Findings of Fact and Conclusions of Law ¶¶ 61–65. In view of the plain terms of

[15] Manya A. Brachear, 3 Dioceses Drop Foster Care Lawsuit—Catholic Charities To End Service Rather Than Work With Parents In Civil Unions, ChicagoTribute.com (Nov. 15, 2011), http://articles.chicagotribune.com/2011-11-15/news/ct-met-catholic-charities-foster-care-20111115_1_civil-unions-act-catholic-charities-religious-freedom-protection.

[16] Elizabeth Fernandez, Catholic Agency Finds Way Out Of Adoption Ban/Alliance With other Groups Gets Around Same-Sex Parent Issue, SFGate.com (Aug. 27, 2006, 4:00 AM), https://www.sfgate.com/bayarea/article/SAN-FRANCISCO-Catholic-agency-finds-way-out-of-2470402.php.

CSS's covenant to be bound by the Fair Practices Ordinance as set forth in the Services Contract, and in view of the expansive, but plain, definition of "public accommodations" under the Fair Practices Ordinance, the Court concludes that the Fair Practices Ordinance applies to CSS's provision of services under the Services Contract.

It is well-established that:

> [c]ontract interpretation is a question of law that requires the court to ascertain and give effect to the intent of the contracting parties as embodied in the written agreement. Courts assume that a contract's language is chosen carefully and that the parties are mindful of the meaning of the language used. When a writing is clear and unequivocal, its meaning must be determined by its contents alone.

Old Summit Mfg., LLC v. Pennsummit Tubular, LLC (In re Old Summit Mfg., LLC), 523 F.3d 134, 137 (3d Cir. 2008) (citing *Dep't of Transp. v. Pa. Indus. for the Blind and Handicapped*, 886 A.2d 706, 711 (Pa. Commw. Ct. 2008)); *see also D&M Sales, Inc. v. Lorillard Tobacco Co.*, No. CIV.A.09-2644, 2010 WL 786550, at *3 (E.D. Pa. Mar. 8, 2010) (providing that "the court's goal is 'to ascertain and give effect to the intent of the contracting parties,'" and "[w]hen the words of an agreement are clear and unambiguous, the court will ascertain the intent of the parties from the language used in the agreement.").

In this case, the Parties' intent that the Fair Practices Ordinance apply to CSS's services is manifest by the clear and unequivocal terms of the Services Contract. In entering into the Services Contract, CSS agreed to the provisions enumerated under Article XV. CSS explicitly "represent[ed], warrant[ed], and covenant[ed] that . . . [CSS was] in compliance with . . . . the Fair Practices Ordinance." Decl. of James Amato Ex. C, ECF p. 18–19 of 39, ECF No. 13-5. Accordingly, the plain terms of the Services Contract manifest the Parties' intent that CSS be

bound by the Fair Practices Ordinance by expressly incorporating the Fair Practices Ordinance into the Services Contract.

Having concluded that the Services Contract evinces the Parties' intent that the Fair Practices Ordinance apply to CSS's services rendered under the Services Contract, the Court turns to the issue of whether the Fair Practices Ordinance would require CSS to provide foster parent certifications and home visits for prospective parents in accordance with the all-comers/nondiscrimination provisions of the Fair Practices Ordinance. The resolution of this issue turns on two questions: (1) whether CSS's scope of services includes the provision of certification and home visits in connection with certification in the first instance, and (2) if so, whether those services fall within the meaning of a public accommodation under the Fair Practices Ordinance.

2. CSS's Scope Of Services Requires CSS To Recruit, Screen, Train, And Certify Resource Caregivers

Here, as with all questions of parties' obligations under a contract, the Court must look to the intent of the parties as embodied in the plain and unambiguous terms of the contract. In agreeing to perform the Scope of Services under the Services Contract, CSS agreed to "recruit, screen, train, and provide certified resource care homes." Decl. of James Amato Ex. A, ECF p. 28 of 52, ECF No. 13-3. Indeed, CSS's obligation to recruit, screen, train, and certify resource caregivers is emphasized elsewhere in the Scope of Services. Decl. of James Amato Ex. A, ECF p. 28–29 of 52, ECF No. 13-3 (providing that "resource caregivers are screened, trained, and certified by [CSS]"); *see also* Decl. of James Amato Ex. A, ECF p. 27 of 52 n.1, ECF No. 13-3 (providing under the "Statement of Purpose" that "Provider Staff is responsible for recruiting and certifying foster and kinship homes"). The Court concludes that CSS's certification of prospective foster parents and CSS's provision of home studies "to assure [that prospective

foster parents] are qualified and well prepared for the responsibility of foster care"[17] are services that CSS agreed to provide under the Services Contract.

Having determined that certification and home studies are services that CSS was hired to provide under the Services Contract, the Court turns to whether these services constitute "public accommodations" under the Fair Practices Ordinance such that CSS's provision of these services must be rendered in accordance with the all-comers, anti-discrimination provision of the Fair Practices Ordinance.

3. The Services That CSS Provides Are Public Accommodations Within The Meaning Of The Fair Practices Ordinance

In interpreting a municipal ordinance, a court must employ the same analysis that the court employs when interpreting a statute. *Tri-Cty. Landfill, Inc. v. Pine Twp. Zoning Hearing Bd.*, 83 A.3d 488, 509 (Pa. Commw. Ct. 2014); *see also Diehl v. City of McKeesport*, 432 A.2d 288, 290 (Pa. Commw. Ct. 1981) (providing that "[t]he rules of statutory construction are applicable to statutes and ordinances alike"). Accordingly, when interpreting an ordinance, a court must determine, as it must when interpreting a statute, the intent of the legislative body that enacted the ordinance. *See Tri-Cty. Landfill, Inc.*, 83 A.3d at 509 (citing 1 Pa. Cons. Stat. § 1921). Generally, the best indicator of the legislative body's intent is the plain language of the ordinance. *Id.*

The Fair Practices Ordinance provides an expansive, but plain definition of the term "public accommodation." Under the Fair Practices Ordinance, a public accommodation is:

> Any [] provider, whether licensed or not, which solicits or accepts patronage or trade of the public or whose . . . services, facilities . . . are extended, offered [] or otherwise made available to the public; including all . . . services provided by any public agency or

[17] Foster Care & Adoption Services, https://cssphiladelphia.org/adoption/ (last visited Jul. 1, 2018).

> authority; any agency, authority or other instrumentality of . . . the City, its departments, boards and commissions.

Philadelphia Fair Practices Ordinance § 9-1102 (Definitions) at 4, Chapter 9-1100 of the Philadelphia Code.

In this case, CSS's provision of services meets the definition of public accommodations and, therefore, CSS must provide its services in accordance with the Fair Practices Ordinance as incorporated by Article XV, § 15.1 of the Services Contract. CSS is a "licensed" "provider" under the Services Contract. CSS publicly solicits prospective foster parents and advertises to attract new foster parents.[18] CSS provides professional "services" to the public. In return for its services, CSS receives public funds and the source of those funds are to be disclosed to the public when CSS disseminates information relating to its services under the Services Contract.[19] CSS operates and maintains facilities that are used by staff and members of the public to carry out CSS's work under the Services Contract. Jun. 19, 2018 Hr'g Tr. 36:18–22 (Amato). The Court concludes, therefore, that CSS's services are public accommodations to be provided consistent with CSS's covenant under Article XV, § 15.1, which requires CSS to serve all Philadelphians who seek out its services.

C. Likelihood of Success on the Merits

Having determined that the terms of the Services Contract, including the all-comers, nondiscrimination provisions of the Fair Practices Ordinance incorporated into the Services Contract under Article XV, § 15.1, apply to CSS's provision of services, the Court turns to

[18] *See* Jun. 18, 2018 Hearing Tr. 65:17 (Fulton) (testifying to seeing a television commercial about foster care); Foster Care & Adoption Services, https://cssphiladelphia.org/adoption/ (last visited Jul. 1, 2018) (soliciting prospective foster parents through a website).

[19] Decl. of James Amato Ex. B, ECF p. 35 of 39, ECF No. 13-4 (Services Contract providing that "[CSS] shall identify the Department as a funding source in all literature, documents reports or pamphlets which Provider publishes develops or produces in connection with this Contract.").

CSS's argument that it nevertheless need not comply with these all-comers, nondiscrimination provisions because compliance would violate CSS's rights under the Free Exercise and Establishment Clauses of the First Amendment, the Pennsylvania Religious Freedom Act ("RFPA"), and the Free Speech Clause of the First Amendment.

1. Free Exercise Clause Claim

i. The Services Contract And Fair Practices Ordinance Incorporated In The Services Contract Is A Neutral Law Of General Applicability Subject To Rational Basis Review

The First Amendment to the United States Constitution provides that "Congress shall make no law . . . prohibiting the free exercise [of religion]." *Tenafly Eruv Ass'n, Inc. v. Borough of Tenafly*, 309 F.3d 144, 165 (3d Cir. 2002) (quoting U.S. Const. amend. I.) (alteration in original). The strictures of the Free Exercise Clause apply to state and local government under the Fourteenth Amendment. *See Cantwell v. Connecticut*, 310 U.S. 296, 303 (1940) (holding the religious protections under the First Amendment apply to the states through the Due Process Clause of the Fourteenth Amendment). "Depending on the nature of the challenged law or government action, a free exercise claim can prompt either strict scrutiny or rational basis review." *Tenafly Eruv Ass'n, Inc.*, 309 F.3d at 165.

When a challenged law "is 'neutral' and 'generally applicable,' and burdens religious conduct only incidentally, the Free Exercise Clause offers no protection." *Id.* at 165 (citing *Employment Div. v. Smith*, 494 U.S. 872, 879 (1990)); *see also Fraternal Order of Police Newark Lodge No. 12 v. City of Newark*, 170 F.3d 359, 364 (3d Cir. 1999) (explaining that in cases involving state laws affecting religious freedoms, *Smith* is the appropriate framework for analysis because the federal Religious Freedom Restoration Act of 1993, passed by Congress in response to *Smith*, does not apply to state actions). Thus, the constitutionality of a neutral and

generally applicable state or local law under the Free Exercise clause is evaluated using the rational basis standard.[20]

By contrast, "if a law is not neutral . . . or is not generally applicable . . . strict scrutiny applies and the burden on the religious conduct violates the Free Exercise Clause unless it is narrowly tailored to advance a compelling government interest." *Tenafly Eruv Ass'n, Inc.*, 309 F.3d 144 at 165 (citing *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 532, 542 (1993)). "A law is not neutral if it has as its 'object . . . to infringe upon or restrict practices because of their religious motivation.'" *Lighthouse Inst. for Evangelism, Inc. v. City of Long Branch*, 510 F.3d 253, 275 (3d Cir. 2007) (citing *Lukumi*, 508 U.S. at 533). "A law is not generally applicable when it 'proscribes particular conduct only or primarily when religiously motivated.'" *Id.* at 275 (citing *Tenafly*, 309 F.3d at 165).

Even if a law is neutral and generally applicable on its face, if "government officials exercise discretion in applying a facially neutral law, so that whether they enforce the law depends on their evaluation of the reasons underlying a violator's conduct, they contravene the neutrality requirement if they exempt some secularly motivated conduct but not comparable religiously motivated conduct." *Tenafly Eruv Ass'n, Inc.*, 309 F.3d 144 at 165–66. Unless there is evidence of government targeting of religious conduct "for distinctive treatment" then the framework for analysis under *Smith*, 494 U.S. 872, will govern the review of a challenged law or action. *Tenafly Eruv Ass'n, Inc.*, 309 F.3d 144 at 167 (quoting *Lukumi*, 508 U.S. at 534).

In the absence of case law directly addressing the factual circumstances presented in this case, the Court finds the Supreme Court's decision in *Christian Legal Soc'y Chapter of the Univ. of California, Hastings Coll. of the Law v. Martinez*, 561 U.S. 661, 698 (2010) instructive. In

[20] "[R]ational basis review requires merely that the action be rationally related to a legitimate government objective." *Tenafly Eruv Ass'n, Inc.*, 309 F.3d 144 at 165 n.24.

Martinez, the Supreme Court reviewed a law school's policy requiring student groups who wished to take advantage of the benefits of official recognition by the law school to comply with an all-comers/nondiscrimination policy. A faith-based student group argued that the University's insistence that the student group comply with the all-comers policy violated, among other things, the group's right to the free exercise of religion. *Id.*

A group of law students at a public law school formed a chapter of the Christian Legal Society ("CLS") that required its members to sign a "Statement of Faith" and adhere to bylaws that would "exclude from affiliation anyone who engages in 'unrepentant homosexual conduct.'" *Id.* at 672. CLS applied for registered student organization ("RSO") status with the law school. RSO status would confer on CLS various benefits including subsidies of CLS's events with funds originating from the school-wide mandatory student-activity fee, use of certain law school facilities, and the ability to advertise events to the student body using the law school's communication channels and the use of the law school's name and logo in advertising. *Id.* at 669–70. To qualify for RSO status, the law school required applicants to agree to a nondiscrimination policy that would prohibit the applicant from discriminating against prospective members on the basis of "race, color, religion, national origin, ancestry, disability, age, sex or sexual orientation." *Id.* at 671. CLS would not adopt the nondiscrimination policy and, accordingly, the school withheld RSO status and its attending benefits from CLS. *Id.* at 673.

In upholding the law school's conditioning of RSO status and attending benefits on CLS's acceptance of the nondiscrimination policy, the Supreme Court reasoned that the law school's policy was, in essence, a neutral "all comers" policy and that the law school, "caught in the crossfire between a group's desire to exclude and students' demand for equal access, may

reasonably draw a line in the sand permitting *all* organizations to express what they wish but *no* group to discriminate in membership." *Id.*at 694. The Supreme Court continued stating that:

> [t]he question here . . . is not whether [the law school] *could*, consistent with the Constitution, provide religious groups dispensation from the all-comers policy by permitting them to restrict membership to those who share their [sincerely held religious belief]. It is instead whether [the law school] *must* grant that exemption. This Court's decision in *Employment Div., Dept. of Human Resources of Ore. v. Smith*, . . . unequivocally answers no to that latter question.

Martinez, 561 U.S. at 694 n.24. The Supreme Court further considered the fact that RSOs "are eligible for financial assistance drawn from mandatory student-activity fees . . . the all-comers policy ensures that no [law] student is forced to fund a group that would reject her as a member." *Id.* at 688. Ultimately, the Supreme Court held that the law school's policy was constitutional despite its incidental effect on CLS and its ability to receive RSO benefits, including financial support for its activities. *Id.* at 698.

The Court also considers the U.S. District Court for the Western District of Michigan's decision in *Teen Ranch, Inc. v. Udow*, 389 F.Supp.2d 827 (W.D. Mich. 2005), which was affirmed by the Sixth Circuit in *Teen Ranch, Inc. v. Udow*, 479 F.3d 403 (6th Cir. 2007), because the court's rationale in *Teen Ranch* provides some analytical assistance on the present facts.

In *Teen Ranch*, a faith-based residential home for troubled youth, Teen Ranch, sued a state agency, charged with placing troubled youth in protective care, after the state agency issued a moratorium against further placements of children with Teen Ranch due to Teen Ranch's policies and practices that violated laws prohibiting the use of state funds for sectarian activities. 389 F.Supp.2d at 829–32. Teen Ranch argued that the state's moratorium on new placements with Teen Ranch "violate[d] the Free Exercise Clause because it conditions the receipt of a governmental benefit on Teen Ranch's surrender of its religious beliefs and practices and

burdens the free exercise of Plaintiff's religious beliefs without satisfying the strict scrutiny standard." *Id.* at 837. In rejecting Teen Ranch's free exercise challenge, the district court reasoned that "[u]nlike [cases involving] unemployment benefits or the ability to hold office, a state contract for youth residential services is not a public benefit." *Id.* at 838 (emphasis added). The district court relied on the Supreme Court's decision in *Locke v. Davey* and explained that in *Locke*:

> where the [Supreme] Court reviewed a state scholarship program that excluded any student who was pursuing a degree in devotional theology . . . [a]lthough the law was not facially neutral with respect to religion, the [Supreme] Court held that it did not violate the Free Exercise Clause [because the law] 'imposes neither criminal nor civil sanctions on any type of religious service or rite . . . . And it does not require students to choose between their religious beliefs and receiving a government benefit. The State has merely chosen not to fund a distinct category of instruction.

Teen Ranch, 389 F. Supp. 2d at 838 (citing *Locke v. Davey*, 540 U.S. 712, 720–21 (2004)). The district court in *Teen Ranch*, thus, recognized that the context in which a purported burden on religious expression occurs is critical in determining whether the state has violated the Free Exercise Clause. There is a difference between fundamental benefits such as unemployment compensation and voluntary contracts for the provision of government services. *Id.* at 838 (stating that there is no support for the proposition that "the State can be required under the Free Exercise Clause to contract with a religious organization").[21] On appeal, the Sixth Circuit stated

[21] The state court in *Catholic Charities of the Diocese of Springfield, et al. v. Madigan, et al.* similarly focused on context in granting summary judgment for the State of Illinois in a factually analogous dispute to the dispute in this case. *See* Section IV.A for a summary of the case in *Madigan*; *see also* Summary Judgment Order 2, *Catholic Charities of the Diocese of Springfield, et al. v. Madigan, et al.*, No. 2011-MR-254 (Ill. Cir. Ct. Aug. 18, 2011) (concluding that despite Catholic Charities' long history of participation in foster care, it did not have a right to a state contract for foster care).

"[a]fter thoroughly reviewing the record, we believe that the district court was correct in reaching its conclusions." *Teen Ranch*, 479 F.3d at 410.

In this case, the Services Contract and the Fair Practices Ordinance incorporated into the Services Contract is, on its face, a neutral law of general applicability under *Smith*, therefore, the Court applies the rational basis test to determine the constitutionality of the Services Contract and its application to CSS.

First the Court concludes that the Services Contract and Fair Practices Ordinance are neutral with respect to religion because there is no evidence that the Services Contract or Fair Practices Ordinance were drafted or enacted with the object "to infringe upon or restrict practices because of their religious motivation." *Lighthouse Inst. for Evangelism, Inc.*, 510 F.3d at 275 (quoting *Lukumi*, 508 U.S. at 533) (emphasis added). The plain language of the Services Contract and the plain language and history of the Fair Practices Ordinance as incorporated into the Services Contract demonstrate neutrality. Article XV, § 15.1 of the Services Contract makes no reference to religion except that § 15.1 would protect individuals receiving services under the Services Contract from religious discrimination. Decl. of James Amato Ex. C, ECF p. 18–19 of 39, ECF No. 13-5 ("Provider shall not discriminate or permit discrimination against any individual because of . . . religion."). The plain language of the Fair Practices Ordinance likewise supports a finding of neutrality. The Fair Practices Ordinance makes no reference to religion except that it, again, prohibits service providers from discriminating on the basis of religion. Philadelphia Fair Practices Ordinance § 9-1106, Chapter 9-1100 of the Philadelphia Code.

The legislative history and intent of the Fair Practices Ordinance similarly supports a finding of neutrality. Philadelphia City Council first enacted the Fair Practices Ordinance in

1963 long before the present dispute between the Parties. Philadelphia City Council amended the Fair Practices Ordinance in 1982, thirty-six years before the events relevant to this case, to broaden the scope of its inclusion policy to protect Philadelphians on the basis of, among other things, sexual orientation. Indeed, the Legislative Findings section of the Fair Practices Ordinance explained the reasons for its enactment. The Fair Practices Ordinance provides that Philadelphia's population:

> Consists of people of every race, ethnicity, color, religion, national origin, sex, sexual orientation, gender identity, ancestry, age, disability, marital status, and familial status . . . . [and] [d]iscrimination in places of public accommodation causes embarrassment and inconvenience to citizens and visitors of the City, creates breaches of the peace, and is otherwise detrimental to the welfare and economic growth of the City.

§ 9-1101. The history and text of the Fair Practices Ordinance provide no basis to conclude that the Fair Practices Ordinance has as its object the infringement of religious rights. Accordingly, the Fair Practices Ordinance, as incorporated by the Parties into the Services Contract, is neutral.

The Services Contract and the Fair Practices Ordinance are also generally applicable. In this case, the Services Contract was, in fact, applied generally. The general applicability of the Services Contract and Fair Practices Ordinance is not only evident from the text of the Services Contract, but also from the actions DHS and Philadelphia took in this case. First, the Services Contract and Fair Practices Ordinance do not "proscribe particular conduct only or primarily when religiously motivated;" they proscribe only CSS's ability to turn away qualified Philadelphians on the basis of particular character traits without regard to secular or religious reasons. *Lighthouse Inst. for Evangelism, Inc.*, 510 F.3d at 275 (citing *Tenafly*, 309 F.3d at 165). Among the character traits that CSS may not consider when refusing to serve qualified Philadelphians are "perceived race, ethnicity, color, sex, sexual orientation, religion, national

origin, ancestry, age, disability, marital status, source of income, familiar [sic] status . . . ." Article XV, § 15.1.

As applied in this case, the Services Contract and Fair Practices Ordinance were, in fact, implemented in a general manner. Not only has DHS confirmed that it would not permit any foster agency under contract, faith-based or not, to turn away potential foster parents for the foster parents' characteristics under the Services Contract and Fair Practices Ordinance, DHS also closed intake of new referrals by CSS and Bethany Christian Services for the same reason. This evidence supports the conclusion that DHS and Philadelphia are not applying the Services Contract or the Fair Practices Ordinance to target particular religious denominations for any religious reason.[22]

Having concluded that the Services Contract and Fair Practices Ordinance are apparently facially neutral and generally applicable and appear to have been neutrally and generally applied in this case, the Court concludes that Defendants' enforcement of the Services Contract and Fair Practices Ordinance is rationally related to a number of legitimate government objectives. While the standard for rational basis review is well known, it bears repeating:

> Under rational basis review, '[a] statute is presumed constitutional, and the burden is on the one attacking the legislative arrangement to negative every conceivable basis which might support it, whether or not that basis has a foundation in the record.' . . . . The regulation must be reasonable and not arbitrary and it must bear 'a rational relationship to a [permissible] state objective.'"

Lighthouse Inst. for Evangelism, Inc., 510 F.3d at 278 (internal citation omitted). While not directly applicable to the local contracting practices at issue in this case, the imposition of

[22] This fact contradicts Plaintiffs' argument that DHS and Philadelphia specifically targeted CSS for its Catholic practices and association with the Archbishop of the Philadelphia Archdiocese. *See* below Section IV.C.2.ii addressing Plaintiffs' argument that strict scrutiny should apply in reviewing Defendants' actions because Defendants purportedly targeted Plaintiffs for Plaintiffs' religious beliefs.

contractual conditions in government services contracts has a long and well-established history. Indeed, the courts, in reviewing federal contracts, have frequently upheld conditions placed on contractors through federal executive orders. *See, e.g.*, Exec. Order No. 8802, 6 F.R. § 3109 (Jun. 25, 1941) (requiring "[a]ll contracting agencies of the Government of the United States . . . include in all defense contracts . . . a provision obligating the contractor not to discriminate against any worker because of race, creed, color, or national origin" even before the enactment of the Civil Rights Act of 1964); PA Exec. Order 2016-05 (Apr. 7, 2016), https://www.governor.pa.gov/executive_orders/executive-order-2016-05-contract-compliance/ (prohibiting "discrimination by reason of race, gender, creed, color, sexual orientation, or gender identity or expression" in the "award, selection, or performance of any contracts or grants issued by Commonwealth agencies").

Here, Defendants have at least six permissible governmental objectives that are furthered by seeking CSS's compliance with the Services Contract. First, DHS and Philadelphia have a legitimate interest in ensuring that when contractors agree to terms in a government contract, the contractors adhere to those terms. Second, DHS and Philadelphia have a legitimate interest in ensuring that when its contractors voluntarily agree to be bound by local laws, the local laws are enforced. Third, DHS and Philadelphia have a legitimate interest in ensuring that when they employ contractors to provide governmental services, the services are accessible to all Philadelphians who are qualified for the services. Fourth, in the context of foster care and adoption, DHS and Philadelphia have a legitimate interest in ensuring that the pool of foster parents and resource caregivers is as diverse and broad as the children in need of foster parents and resource caregivers. Fifth, DHS and Philadelphia have a legitimate interest in ensuring that individuals who pay taxes to fund government contractors are not denied access to those

services.[23] Sixth, DHS and Philadelphia have an interest in avoiding likely Equal Protection Clause and Establishment Clause claims that would result if it allowed its government contractors to avoid compliance with the all-comers, nondiscrimination provisions of the Fair Practices Ordinance by discriminating against same-sex married couples.[24]

That Defendants have legitimate objectives in this case is clearer still in view of the Supreme Court's decision in *Martinez*, 561 U.S. 661 and the decision in *Teen Ranch*, 389 F. Supp. 2d 827. In *Martinez*, the Supreme Court explained that where a public law school was "caught in the crossfire between a group's desire to exclude and [an interest in] equal access, [the

[23] *See Martinez*, 561 U.S. at 688 (concluding that the fact that where University organizations may receive funding derived from a mandatory student-activity fee, that the University has an interest in ensuring that no student "is forced to fund a group that would reject her as a member.").

[24] *See, e.g.*, *Campaign for Southern Equality v. Mississippi Dep't of Human Servs.*, 175 F.Supp.3d 691 (S.D. Miss. 2016) (granting injunction to same-sex couples against state department of human services on basis that state law prohibiting adoption by same-sex couples violated federal equal protection under *Obergefell v. Hodges*, 135 S.Ct. 2584 (2015)).

The Court notes that while the Third Circuit rejected "avoiding 'an Establishment Clause controversy'" as a government interest in *Tenafly*, in that case, the Third Circuit concluded that strict scrutiny applied and, thus, a "possible" Establishment Clause controversy could not meet the exacting requirements of a "compelling" government interest. 309 F.3d at 172. Further, in *Tenafly*, the Third Circuit concluded that the existence of an Establishment Clause controversy was, in essence, impossible. Here, faced with the Supreme Court's ruling in *Obergefell*, recognizing marriage for same-sex couples and marriage's attending benefits, and faced with the fact that CSS conditions the provision of its services on prospective parents' procurement of a clergy letter, the possibility of an Equal Protection and Establishment Clause claim is not as remote a possibility as was the case in *Tenafly*.

The Court also notes here that although CSS has disclaimed responsibility as a government actor in connection with some aspects of its claims, CSS, otherwise has urged the Court to consider CSS as a government contractor "akin to a government employee" in connection with its argument on Free Speech grounds. Pls.' Br. 26, ECF No. 10-2. The Court need not decide whether CSS would qualify as a state actor at this time in connection with any possible Equal Protection or Establishment Clause claim.

law school] may reasonably . . . permit[] *all* organizations to express what they wish but *no* group to discriminate in membership." 561 U.S. at 694. In this case, DHS and Philadelphia are in much the same position as the law school in *Martinez* and, like the law school in *Martinez*, they may permit government contractors to express what the contractors wish but may also insist that their contractors adhere to contractual obligations to serve all-comers and not discriminate. To permit a contractor to avoid a contractual provision requiring the contractor to accept all those who seek their services unilaterally would permit what the Supreme Court explained could not be permitted in *Martinez*.[25]

In this case, as in *Teen Ranch*, context matters. In *Teen Ranch*, the district court aptly drew a distinction between cases involving essential government benefits such as unemployment compensation or the ability to hold office, and "a state contract for youth residential services, which is not a public benefit." 389 F. Supp. 2d at 838; *see also* Summary Judgment Order 2, *Catholic Charities of the Diocese of Springfield, et al. v. Madigan, et al.*, No. 2011-MR-254 (Ill. Cir. Ct. Aug. 18, 2011) (granting summary judgment for State of Illinois reasoning that Catholic Charities did "not have a legally recognized protected property interest in the renewal of its contracts for foster care and adoption services"). There is no support for the proposition that "the State can be required under the Free Exercise Clause to contract with a religious organization." *Id.* at 838. Here, CSS seeks, as the plaintiff in *Teen Ranch* sought, a government services contract on terms that it deems acceptable, but unlike those cases where the government withheld essential benefits on religious grounds, CSS is not entitled to a government services contract to perform governmental work. It further bears repeating that there is no evidence in the

[25] When asked whether the public law school was required to exempt a faith-based student group's decision from an all-comers/nondiscrimination policy, the Supreme Court answered that "[t]his Court's decision in *Employment Div., Dept. of Human Resources of Ore. v. Smith*, . . . unequivocally answers no to that . . . question." *Martinez*, 561 U.S. at 694 n.24.

record that either DHS or Philadelphia has withheld a new contract or contractual compensation to CSS on religious grounds. The Court concludes that the terms of Services Contract, as applied by Defendants in this case, would likely survive rational basis review.

ii. No Evidence Of Targeting To Trigger Strict Scrutiny

Although the Court concludes that rational basis review applies in this case, the Court addresses Plaintiffs' argument that strict scrutiny review should apply instead.

At the outset, the Court acknowledges the Parties' varying citations to the recent Supreme Court case, *Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Comm'n*, 138 S.Ct. 1719 (2018). *Masterpiece Cakeshop*, however, has little bearing on this case in view of *Masterpiece Cakeshop*'s narrow holding. Among other narrow propositions, *Masterpiece Cakeshop* stands for the unfortunately now-remarkable proposition that disputes such as the one before this Court "must be resolved with tolerance." *Id.* at 1732.

In an attempt to show that Defendants' actions are subject to strict scrutiny despite the facial neutrality and general applicability of the Services Contract provisions at issue, and DHS's and Philadelphia's expressed preference to continue contracting with CSS, Plaintiffs allege that Defendants have targeted CSS "purely based on its religious beliefs." Pls.' Br. 17, ECF No. 13-2. In support of their claim of targeting, Plaintiffs point to (1) anti-Archdiocese of Philadelphia and anti-Archbishop of Philadelphia comments made by the Mayor of Philadelphia to show that DHS and Philadelphia intentionally sought to penalize CSS for its religious beliefs and exercise, and (2) the purported selective, discretionary enforcement of "laws or legal instruments in a way that burdens conduct for religious reasons but not secular reasons." Pls.' Br. 21, ECF No. 13-2. Plaintiffs draw too strong a conclusion from the Mayor's comments and misapprehend the way

in which "secular exemptions" might show a government's actions are not neutral or generally applied so as to trigger strict scrutiny.

First, contrary to Plaintiffs' contentions, the Mayor's comments do not support the conclusion that DHS targeted CSS for its Catholic beliefs because (a) there was insufficient evidence at the preliminary injunction phase to show that the Mayor had any influence in DHS's decisions in this case, thereby rendering the comments irrelevant to these proceedings, and (b) even comments the Mayor made relating to Catholicism do not demonstrate targeting in light of the fact that DHS also closed Bethany Christian Services's referrals intake, a non-Catholic agency, that similarly would not comply with its obligation to serve all-comers under its foster agency contract.

Plaintiffs cite four comments involving the Mayor of Philadelphia that purportedly show that DHS closed CSS's intake due to CSS's Catholic beliefs.[26] First, Plaintiffs cite a nearly three-year-old *Philadelphia Magazine* article about then mayoral candidate Jim Kenney in which Kenney appeared critical of policies of the Archdiocese of Philadelphia and the Archbishop of Philadelphia, but appeared otherwise approving of Pope Francis, Catholic sisters, and other Catholic orders and programs.[27] Second, Plaintiffs cite a nearly two year old *Philadelphia Inquirer* article in which Mayor Kenney was quoted as saying that Philadelphia Archbishop

[26] The difficulty in Plaintiffs relying on the Mayor's statements, in part, stems from the fact that the Mayor himself was raised Catholic and, therefore, it is conceivable that when the Mayor has commented on Catholicism in the past, he was commenting on Catholic ideas as they related to his own faith. The Supreme Court has recently reminded the courts that they are to "take care not to engage in [] any judicial psychoanalysis" of lawmakers. *Trump v. Hawaii*, No. 17-965, 2018 WL 3116337, at *37 (U.S. June 26, 2018) (Sotomayor, J., dissenting). This is why the courts, when determining the intent of legislators, generally confine their review to statements made contemporaneously with the legislation in question. *Id.*

[27] Patrick Kerkstra, Jim Kenney's Long War With The Archdiocese, Phillymag.com, (July 9, 2015, 11:23 PM), https://www.phillymag.com/citified/2015/07/09/jim-kenney-catholic-archdiocese-charles-chaput/.

Chaput's guidelines on the implementation of a Catholic text, *Amoris Laetitia*, were "not Christian."[28] Third, Plaintiffs cite a March 16, 2018 comment by the Mayor where the Mayor stated "we cannot use taxpayer dollars to fund organizations that discriminate against people because of their sexual orientation or because of their same-sex marriage status . . . . It's just not right."[29] Fourth, Plaintiffs cite a May 7, 2018 letter indicating that the Philadelphia Commission on Human Relations was investigating CSS's policy of turning away certain persons based on their status as same-sex and married at "the request of the Mayor." *See* (initial) Injunction Motion Ex. 1-G (sealed), ECF No. 10-14.

Plaintiffs rely too heavily on these four citations to draw a sweeping conclusion that CSS has suffered impermissible hostility at the hands of the Mayor. The evidence submitted at the three-day evidentiary hearing is insufficient to draw the conclusion Plaintiffs would have the Court draw. There was no evidence to show that the Mayor directed DHS to close CSS's intake of new referrals or to insist that CSS comply with its contractual obligation to serve all Philadelphians. *See* Jun. 19, 2018 Hr'g Tr. 166:6–21 (Figueroa) (testifying that Commissioner Figueroa herself "decided that it was in the best interest [of children] to close intake, so that [Figueroa] could look more deeply into" CSS's and Bethany Christian Services's policies); Figueroa Decl. ¶ 32, ECF No. 20-6 (same); Jun. 18, 2018 Hr'g Tr. 96:2–3 (Ali) (testifying that, to Ali's knowledge, Commissioner Figueroa herself decided to close CSS's intake of new

[28] David O'Reilly, Chaput Edict Draws Mixed Reviews; Kenney Calls It 'Not Christian', Philly.com, (Jul. 6, 2016, 11:04 PM), http://www.philly.com/philly/news/20160707_Chaput_edict_draws_mixed_reviews__Kenney_calls_it__not_Christian_.html. *See* Mot. for Temporary Restraining Order or Preliminary Injunction Ex. 1-J, ECF No. 10-17.

[29] Tom MacDonald, Philly Halts Foster Placements With 2 Faith-Based Agencies Shutting Out LGBT Couples, WHYY.com, (Mar. 16, 2018), https://whyy.org/articles/philly-halts-foster-placements-2-faith-based-agencies-shutting-lgbt-couples/. This article was cited in Plaintiffs' Brief and is attached as Exhibit 1-U to Plaintiffs' initial Injunction Motion. *See* Mot. for Temporary Restraining Order or Preliminary Injunction Ex. 1-U, ECF No. 10-28.

referrals); Jun. 21, 2018 Hr'g Tr. 108:11–13, 108:18–20 (Figueroa) (testifying that Commissioner Figueroa did not know the Mayor's views on CSS when Figueroa met with CSS, nor did Figueroa "discuss cutting off intake with the Mayor's office").

That DHS made its own decision to close intake is supported by the fact that DHS has closed intake for other foster care agencies in the past for a number of reasons and, thus, intake closure is a relatively unremarkable DHS administrative action that may be taken to address a number of agency concerns. *See, e.g.*, Jun. 21, 2018 Hr'g Tr. 5:14–15 (Figueroa) (testifying that "I have closed intake in other circumstances for other providers."); Jun. 21, 2018 Tr. 8:24-25–9:1 (Figueroa) (testifying that the week before, DHS also closed intake for another agency). In short, there is insufficient evidence in the record to show that the Mayor was involved in DHS's decision to close CSS's and Bethany Christian Services's intake of new referrals. Therefore, the Mayor's comments are irrelevant to this case and cannot support Plaintiffs' claim of religious hostility and intentional targeting.

Each of Plaintiffs' four citations purportedly showing DHS's intentional targeting of CSS on religious grounds cannot support Plaintiffs' conclusion for a number of other reasons. Plaintiffs' first two citations are three and two years old, respectively. The events that precipitated this case occurred in March 2018. These first two citations, as a matter of timeliness, if not substance, are irrelevant. Plaintiffs' third citation to the Mayor's comment that "we cannot use taxpayer dollars to fund organizations that discriminate against people because of their sexual orientation or because of their same-sex marriage status . . . . It's just not right" is, by its plain terms, not about religious views, but about whether publicly funded service providers may refuse to serve all Philadelphians, including those that are in same-sex marriages. Plaintiffs' fourth citation, to a May 7, 2018 letter in which the Philadelphia Commission on Human

Relations indicated that the Commission would undertake an investigation, in part, at the request of the Mayor, was sent after DHS made an independent decision to close CSS and Bethany Christian Services's intake. The letter, therefore, cannot support a conclusion that the Mayor was involved in DHS's decision.

Plaintiffs also have pointed to Commissioner Figueroa's statement at the May 15 meeting between DHS officers and CSS management that "it would be great if we listened to the teachings and the words of our current Pope Francis" as another ground on which to rest its targeting and preference allegations. Jun. 21, 2018 Hr'g Tr. 106:1–3 (Figueroa). As with the Mayor's comments, Plaintiffs draw too broad a conclusion from the Commissioner's statement. The fact remains that DHS closed intake for both CSS and Bethany Christian Services, a non-Catholic organization. This fact undercuts Plaintiffs' position that DHS has targeted CSS for its Catholic beliefs. Further, Commissioner Figueroa's words themselves are unclear whether references to "we" and "our current Pope Francis" were references to her own beliefs as a Catholic who was educated by the Jesuit order, or as a representative of DHS. Jun. 19, 2018 Hr'g Tr. 149:5–18. As cautioned by Justice Sotomayor, the Court will not engage in judicial psychoanalysis on these facts. *Trump v. Hawaii*, No. 17-965, 2018 WL 3116337, at *37.

In an another attempt to show that DHS has targeted CSS on religious grounds, Plaintiffs argue that DHS has granted secular exemptions to the Services Contract's fair practices provisions, but now refuse a religious exemption to CSS. Plaintiffs, however, misapprehend how religious targeting may be proven through the government's provision of "secular exemptions." On this issue, the Third Circuit's decision in the case *Fraternal Order of Police Newark Lodge No. 12 v. City of Newark*, provides the framework for determining whether the government is impermissibly providing secular exemptions to a regulation, and not providing

comparable religious exemptions to the same regulation in violation of the First Amendment. 170 F.3d 359 (3d Cir. 1999).

In *Fraternal Order of Police*, the Third Circuit considered a police department regulation that prohibited its officers from wearing beards to maintain uniformity among the officers. 170 F.3d at 361. The regulation applied generally to all officers, but the police department carved out a categorical exemption for officers who had medical reasons for keeping a beard. *Id.* By contrast, the police department refused to carve out a categorical exemption for officers who had religious reasons for keeping a beard. *Id.* Then Circuit Judge Alito wrote for the Third Circuit that the police department's exemption from the no-beard policy on medical grounds "raise[d] concern because it indicate[d] that the [police department] ha[d] made a value judgment that secular (i.e., medical) motivations for wearing a beard are important enough to overcome its general interest in uniformity but that religious motivations are not." *Id.* at 366 (emphasis added). The focus of analysis must be on whether the government exempts activities that would violate the policy at issue for secular reasons, but not for religious reasons. Thus, in *Fraternal Order of Police*, the focus was on the police department's provision of a secular exemption from the no-beard policy.

Here, the policy at issue is the fair practice provisions of CSS's Services Contract, that is the all-comers, nondiscrimination provisions. The question is whether DHS grants exemptions to the fair practice provisions of foster agency contracts for secular reasons, but denies CSS an exemption for religious reasons thereby evidencing an impermissible governmental value judgment that secular motivations for violating fair practice provisions are more important than religious motivations. The answer to this question is no. There is no evidence in the record to show that DHS has granted any secular exemption to the requirement that its foster care agencies

provide their services to all comers. Plaintiffs have not alleged, nor have Plaintiffs presented, any evidence that DHS has granted exemptions to any secular agency to permit a secular agency to refuse its services to all comers in contravention of any fair practices provisions of any foster services contract.

The purported secular exemptions to which Plaintiffs point to show religious targeting are not, in fact, exemptions to the fair practices requirements and, as such, cannot be considered evidence of targeting. CSS complains that DHS has permitted "referrals of families for a variety of secular reasons, including proximity, expertise in caring for medical needs, expertise in addressing behavioral needs, ability to find foster placements for pregnant youth, expertise working in a 'kin care' program, and other specialties or areas of focus." Pls.' Br. 21, ECF No. 13-2. These "secular reasons," however, are not exemptions from fair practices requirements. DHS permits agencies to "refer" prospective foster parents to specialty agencies equipped to handle certain special needs, but nowhere is there evidence in the record that DHS permits agencies to refuse to provide their services to prospective foster parents in violation of the fair practices policies contained in government contracts or local law. While CSS has represented that it would euphemistically "refer" same-sex couples to other foster agencies willing to serve same-sex couples, CSS's "referral" to another agency would nevertheless amount to CSS's refusal to serve that same-sex couple.

As there is insufficient evidence to support the conclusion that DHS has explicitly targeted CSS for religious reasons, strict scrutiny is inapplicable in this case.

2. Establishment Clause Claim

Plaintiffs also assert a claim under the Establishment Clause based on Defendants' alleged "engag[ment] in denominational preference and targeting." Pls.' Br. 24, ECF No. 10-2.

The First Amendment to the U.S. Constitution provides that "there should be 'no law respecting an establishment of religion.'" *Lemon v. Kurtzman*, 403 U.S. 602, 612 (1971) (quoting the First Amendment)). The Supreme Court has provided two tests for deciding whether government action runs afoul of the Establishment Clause: the "endorsement test" and the *Lemon* test. *Doe v. Indian River School Dist.*, 653 F.3d 256, 282–83 (3d Cir. 2011). Plaintiffs have not articulated how, if at all, Defendants' actions fit under either test. Instead, Plaintiffs have simply asserted that Defendants have "demonstrate[d] a preference for some religious groups over CSS." Pls.' Br. 24, ECF No. 13-2. The Court cannot conclude that Plaintiffs have met their burden of showing entitlement to relief under the Establishment Clause. The Court will, nevertheless, address Plaintiffs' Establishment Clause arguments as they have articulated them below, despite Plaintiffs' failure to articulate a claim under the endorsement test or the *Lemon* test.

In support of Plaintiffs' Establishment Clause claim, Plaintiffs cite to the same purported evidence of religious targeting that they cited in connection with their free exercise claim, that is, evidence of the Mayor's alleged bias against the Archdiocese of Philadelphia and the Archbishop of Philadelphia. Plaintiffs argue that the Mayor's comments in tandem with DHS's actions "demonstrate an intent to target Catholic Social Services based upon disagreement with [CSS's] religious beliefs." Pls.' Br. 25, ECF No. 10-2. As discussed in connection with Plaintiffs' religious targeting argument, above, the evidence does not support Plaintiffs' sweeping conclusion.

In pursuing its Establishment Clause claim, CSS glosses over the fact that it has not been singled out for its policy of refusing to serve all qualified Philadelphians. DHS closed Bethany Christian Services's intake of new referrals for the same reason DHS closed CSS's intake. Jun. 21, 2018 Hr'g Tr. 12:9–23 (Figueroa) (testifying that DHS closed Bethany Christian Services's

intake and that its intake remains closed, however, Bethany Christian Services has represented that it will enter into a new contract with the DHS for the coming year and comply with the fair practices requirements under its contract). That DHS closed intake for CSS, which operates under the command of the Archdiocese of Philadelphia, and also closed intake for Bethany Christian Services, not associated with the Archdiocese of Philadelphia, militates against concluding that DHS has engaged in denominational preference and targeting. The Mayor's allegedly anti-Archdiocese of Philadelphia and anti-Archbishop of Philadelphia comments offer no support to Plaintiffs' argument of denominational preference and targeting because DHS also closed Bethany Christian Services's intake, which is not associated with the Archdiocese of Philadelphia or the Archbishop of Philadelphia.

Plaintiffs have not demonstrated entitlement to relief under the Establishment Clause.

3. Pennsylvania Religious Freedom Act Claim

Plaintiffs' next lodge a statutory claim under the Pennsylvania Religious Freedom Act ("RFPA"). 71 Pa. Cons. Stat. Ann. §§ 2401–2407. Before turning to the substance of Plaintiffs' claim, the Court emphasizes that Plaintiffs' claim is a state law claim. Under certain circumstances a district court may abstain from ruling on a state law issue, such as the issue in this case, in favor of allowing the state courts an opportunity to address the issue. Indeed, in *Combs v. Homer-Center School Dist.*, the Third Circuit vacated a district court order awarding a defendant summary judgment on a RFPA claim and ordered the district court to remand the matter to the appropriate state court for adjudication. 540 F.3d 231, 253–254 (3d Cir. 2008). The Third Circuit explained in *Combs*, that "[b]ecause all federal issues have been decided on summary judgment and since [the plaintiffs'] RFPA claim raises a novel and potentially complex issue of State law, we will decline to exercise supplemental jurisdiction over [the plaintiffs']

pendent state law claim." 540 F.3d at 254. Notwithstanding the Third Circuit's guidance that the district courts remain wary of intruding upon state law matters, the Court will address Plaintiffs' RFPA claim in view of the procedural posture of this case.

At the preliminary injunction stage, the Third Circuit has advised that considerations of the novelty and potential complexity of a state law question "have very little weight." *New Jersey-Philadelphia Presbytery of the Bible Presbyterian Church v. New Jersey State Bd. of Higher Educ.*, 654 F.2d 868 (3d Cir. 1981) (concluding that the concerns implicated by the *Pullman* doctrine, which permits courts to abstain from deciding certain complex state law matters are of less import at the preliminary injunction stage). While the state law matters presented in this case are complex, the Court finds that state court precedent provides a sound basis for a decision on Plaintiffs' RFPA claim at the preliminary injunction stage.

Section 2401 of RFPA provides:

> (a) General rule. Except as provided in subsection (b), an agency shall not substantially burden a person's free exercise of religion, including any burden which results from a rule of general applicability.
>
> (b) Exceptions. An agency may substantially burden a person's free exercise of religion if the agency proves, by a preponderance of the evidence, that the burden is all of the following:
>
> (1) In furtherance of a compelling interest of the agency.
>
> (2) The least restrictive means of furthering the compelling interest.

71 Pa. Cons. Stat. Ann. § 2404 (emphasis added).

While RFPA would appear, on its face, to protect a wide range of religious activity, the Third Circuit has noted that "[s]ignificantly, not all burdens on the exercise of religion trigger the RFPA's heightened scrutiny." *Brown v. City of Pittsburgh*, 586 F.3d 263, 285 (3d Cir. 2009).

The Third Circuit has explained that the nature of our society is such that "virtually all legislation . . . imposes an incidental burden at some level by placing indirect costs on an individual's activity." *Id.* at 285 (internal quotation omitted) (alteration in original). When the costs of legislation may affect religious freedoms, the Pennsylvania General Assembly has "identified a substantiality threshold as the tipping point for requiring heightened justifications for governmental action." *Id.* at 285 (citing *Combs v. Homer-Center School Dist.*, 540 F.3d 231, 262 (3d Cir. 2008) (Scirica, C.J., concurring)). RFPA further "requires 'as a threshold matter' that persons invoking its protections 'prove . . . that their free exercise of religion has or will likely be substantially burdened' by 'clear and convincing evidence'." *Id.* at 285 (citing *Combs*, 540 F.3d at 253 (per curiam)) (emphasis added). The Third Circuit has quoted Chief Judge Scirica's concurring opinion in *Combs* for the proposition that "by requiring proof of 'a substantial burden' by clear and convincing evidence, Pennsylvania appears to have set a higher threshold than other religious restoration statutes." *Id.*at 285 (citing *Combs*, 540 F.3d at 262 (Scirica, C.J., concurring)) (emphasis added).

Under RFPA, a law substantially burdens a person's fundamental religious exercise if it:

> (1) Significantly constrains or inhibits conduct or expression mandated by a person's sincerely held religious beliefs.
> (2) Significantly curtails a person's ability to express adherence to the person's religious faith.
> (3) Denies a person a reasonable opportunity to engage in activities which are fundamental to the person's religion.
> (4) Compels conduct or expression which violates a specific tenet of a person's religious faith.

71 Pa. Cons. Stat. Ann. § 2403. In determining whether the government substantially burdens a person's free exercise of religion under RFPA, a state law, the Court looks to the way in which the state law has been interpreted and applied by state courts.

In *Ridley Park United Methodist Church v. Zoning Hearing Bd. Ridley Park*, 920 A.2d 953 (Pa. Commw. Ct. 2007), the Commonwealth Court reviewed a church's claim that a town zoning ordinance prohibiting the operation of a church-run religious childcare center on the church's property violated the church's free exercise under RFPA. The Commonwealth Court framed the issue presented as "whether the Church would be 'substantially burdened' if it was precluded from operating a daycare center because it would lose 'a reasonable opportunity to engage in activities which are fundamental to [its] religion.'" 920 A.2d at 960 (quoting 71 Pa. Cons. Stat. Ann. § 2403). The Commonwealth Court resolved the issue by concluding that:

> nothing here impinges on the religious activities of the Church. While it aided in carrying out the Church's religious mission, the daycare is not a fundamental religious activity of a church. For example, ministering to the sick can flow from a religious mission, but it is not a fundamental religious activity of a church because a hospital may be built to satisfy that mission.

Id. at 960. Thus, the Commonwealth Court concluded the zoning ordinance "does not violate the RFPA" because "the [c]hurch failed to meet its burden of proving that it was substantially denied a reasonable opportunity to engage in activities that were fundamental to its religion." *Id.*

In *Staple v. Dep't of Corrections*, the Commonwealth Court considered a situation in which the Pennsylvania Department of Corrections confiscated religious texts from an inmate. 2014 WL 2927286 at *4 (Pa. Commw. Ct. 2014) (not precedential). While *Staple* involved the application of a specific carve out under RFPA that grants correctional facilities greater authority to burden inmates' religious freedoms, the case, nevertheless, provides some insight into the limits of RFPA. A person's access to religious texts would ostensibly be one of the most fundamental religious rights, and yet, even under RFPA, a state agency may confiscate and prohibit an individual's access to such texts. *Id.* at 4. The result in *Staple*, thus, would confirm the Third Circuit's observation in *Brown* that "Pennsylvania appears to have set a higher

threshold than other religious restoration statutes" and that RFPA does not provide protection in many circumstances. *Id.*at 285 (citing *Combs*, 540 F.3d at 262 (Scirica, C.J., concurring)); *see also Brown*, 586 F.3d at 288 (holding that RFPA provides only as much protection to religiously motivated expression as the First Amendment's Free Speech Clause).

In *Commonwealth v. Parente*, the Commonwealth Court addressed a defendant's assertion that a city noise control ordinance prohibiting the defendant's use of a hand-held microphone with speakers to "exercise his religious beliefs" in accordance with "the dictates of his conscience and serv[ing] God by peacefully preaching and counseling people," violated his rights under RFPA. 956 A.2d 1065, 1073 (Pa. Commw. Ct. 2008). The Commonwealth Court held that the application of the ordinance and the defendant's conviction thereunder did not violate the defendant's rights under RFPA because "the defendant failed to establish that the activities he engaged in were fundamental to his religion." *Id.*at 1074. Instead, the defendant proved only that "he engaged in these activities based upon his religious beliefs or that [the activites] flowed from a religious mission." 956 A.2d at1074 (emphasis added). In so holding, the Commonwealth Court drew a distinction between those activities that are fundamental to a person's religion and those activities that may be inspired by or flow from a religious mission.

These state court decisions interpreting RFPA highlight what the Third Circuit has noted in other cases: the analytical framework established by RFPA "appears to create some tension between state and federal law." *Combs*, 540 F.3d at 258. While the "United States Supreme Court has cautioned against making religious interpretations in the First Amendment context," the Pennsylvania General Assembly and the Commonwealth's courts appear to require courts to "inquire into . . . whether an activity is fundamental to a person's religion." *Id.*

In this case, Plaintiffs have articulated their fundamental religious exercise as "providing foster care to Philadelphia children." Pls.' Br. 13, ECF No. 13-2; *see also* Pls.' Proposed Findings of Fact and Conclusions of Law ¶ 120, ECF No. 46 (stating that "[c]aring for foster children is a fundamental religious exercise for Plaintiffs); Jun. 19, 2018 Hr'g Tr. 37 (Amato) (testifying that "the church's care for orphans . . . at-risk children . . . [is] intrinsic to who we are and what we do."). Although the decision in *Ridley Park* raises significant doubt about whether Pennsylvania courts would consider foster care to be a fundamental religious exercise,[30] the Court will assume, for purposes of the Injunction Motion, that "providing foster care to . . . children" constitutes a fundamental religious exercise under RFPA. Pls.' Br. 13, ECF No. 10-2.

Assuming that providing foster care to children constitutes a fundamental religious exercise, the next question under RFPA analysis is whether holding CSS to its obligations under the Services Contract, in particular its obligation to provide its services to all-comers in accordance with the Fair Practices Ordinance, substantially burdens CSS's provision of foster care to children. The Court concludes that CSS's provision of foster care to children is not substantially burdened in this case because CSS is not reasonably likely to show by clear and convincing evidence that its fundamental religious exercise has been substantially burdened under any of the four definitions of "substantial burden" provided under RFPA.[31] Requiring

[30] As discussed in detail above, the Commonwealth Court held that childcare "is not a fundamental religious activity of a church" even if childcare may "aid[] in carrying out the Church's religious mission." *Ridley*, 920 A.2d at 960. Indeed, the Commonwealth Court reasoned that while "ministering to the sick can flow from a religious mission . . . it is not a fundamental religious activity of a church." *Id.* at 960. There is little question that "providing foster care to . . . children" likely flows from and aides CSS's religious mission, but it is not as clear, that foster care is a fundamental religious exercise under *Ridley Park*.

[31] Plaintiffs claim that "all four types of burden" considered "substantial" under § 2403 of RFPA are implicated in this case. Plaintiffs assert that DHS's actions "[s]ignificantly constrain[] or inhibit[] conduct or expression mandated by [Catholic Social Services'] religious beliefs" and "[d]en[y] [CSS] a reasonable opportunity to engage in activities which are fundamental to the

CSS's compliance with the terms of the Services Contract does not: constrain or inhibit CSS from conduct or expression mandated by its religious beliefs, curtail CSS's ability to express adherence to CSS's religious faith, deny CSS a reasonable opportunity to "provide foster care to children," or compel CSS to engage in conduct or expression that violates a "specific tenet" of CSS's religious faith.

Resolution of the issue of "substantial burden" requires the Court to focus on what precisely CSS has been asked to do in this case and whether doing it necessarily results in a conflict with CSS's religious beliefs. CSS has been asked, and indeed CSS agreed when it entered into the Services Contract, to serve all persons who seek CSS's services consistent with the all-comers provisions of the Fair Practice Ordinance. Compliance with the all-comers provisions would, as discussed above, require CSS to provide certification services to prospective parents regardless of, among other things, religion, race, marital status, sexual violence victim status, sex, sexual orientation, gender identity, or age. CSS contends that compliance with the all-comers provision of the Services Contract necessarily compels it to engage in "conduct and expression contrary to Catholic teaching," in particular, Catholic teaching about marriage. Pls.' Br. 14, ECF No. 10-2.

CSS contends that the provision of certification services for same-sex couples would require CSS to express its religious approval of same-sex relationships in contravention of Catholic teaching about marriage. This is not the case. To illustrate this point, if, for example, CSS were to certify a couple where one spouse is previously divorced, CSS's certification would

[agency's] religion." Pls.' Proposed Findings of Fact and Conclusions of Law ¶ 126, ECF No. 46 (alterations in original); *see also* Pls.' Br. 12, ECF No. 10-2 (asserting same burdens using verbatim language). Elsewhere, Plaintiffs also state that DHS's actions "curtail . . . Catholic Social Services' 'ability to express adherence' to its faith, and attempt to '[c]ompel[] conduct or express which violates a specific tenet of [Catholic Social Services'] religious faith.'" Pls.' Br. 14, ECF No. 10-2 (alterations in original).

not suggest that CSS approved of divorce as a religious matter. In short, CSS was hired to provide a scope of services to the citizens of Philadelphia that is narrower than CSS contends.

The Services Contract requires CSS to "recruit, screen, train, and provide certified resource care homes" consistent with the all-comers provisions of the Fair Practices Ordinance Decl. of James Amato Ex. A, ECF p. 28 of 52, ECF No. 13-3. The Services Contract does not require CSS to do anything in connection with prospective foster parents but certify prospective foster parents as meeting state guidelines for foster care. CSS is imbuing its certifications with meaning that is not required or compelled by the Services Contract. The Services Contract does not require CSS to express its religious approval or disapproval of persons seeking out its services. The Services Contract does not require CSS to do or say anything else in connection with CSS's religious views.

With this understanding in mind, the Court concludes that DHS has not and is not constraining Plaintiffs' ability to engage in the provision of foster care to children by imposing on CSS a contractual condition that would require CSS to violate its religious beliefs or curtail CSS's ability to express its religious beliefs. In essence, if CSS provides its services consistent with the minimal requirements of the all-comers provisions of the Fair Practices Ordinance, then CSS may continue to provide foster care to children. This does not constitute a substantial burden on CSS's religious exercise of providing foster care to children. As to the individual Plaintiffs, as discussed in detail below and in connection with the irreparable harm prong, the individuals are not constrained by Defendants' actions in connection with CSS in their fostering of children because the individual Plaintiffs are, as they always have been, entitled to be foster parents with any of the thirty foster care agencies with whom DHS has contracted.

4. Free Speech Claims

Plaintiffs allege two claims under the Free Speech Clause of the First Amendment. First, Plaintiffs allege that the services CSS provides under the Services Contract relating to certification of prospective foster parents are services for which CSS is not paid, therefore, by requiring CSS to provide certifications DHS is compelling CSS to engage in unpaid for speech. Second, Plaintiffs contend that DHS and Philadelphia retaliated against CSS for CSS's comments published in the March 13 *Philadelphia Inquirer* article in violation of the Free Speech Clause. The Court rejects both claims. First, in hiring CSS to perform services under the Services Contract, DHS and Philadelphia did not seek to create a forum for private speech nor did they seek to promote speech at all. Rather, DHS contracted for specific services relating to DHS's responsibility of providing foster care services to the citizens of Philadelphia, including certification services and home visits for prospective foster parents. This is the case whether CSS was paid in a lump sum or per diem as CSS contends. Second, there is insufficient evidence to conclude that DHS retaliated against CSS for CSS's religious views as opposed to CSS's confirmation that its policies directly contradict the Services Contract.

i. Compelled Speech

In resolving Plaintiffs' claim that DHS and Philadelphia are impermissibly conditioning CSS's contract on unconstitutionally compelled speech, the Court begins by identifying the purpose of the contract because the purpose of the contract is the springboard for analysis.[32]

[32] The Court disagrees that DHS and Philadelphia are conditioning the grant of a contract to CSS on CSS's agreement to "adopt [a] particular belief." Pls.' Proposed Findings of Fact and Conclusions of Law 67, ECF No. 46. DHS and Philadelphia ask only what they would ask of any contracting party, that CSS enter into the contract consistent with the duty of good faith and fair dealing. DHS and Philadelphia have asked CSS to confirm that, to the extent CSS would enter into an agreement that CSS could perform in accordance with the contract's fair practices provisions.

The U.S. Supreme Court's decision in *Legal Services Corp. v. Velazquez* advised courts to look to the purpose of a government program when analyzing whether a government condition to participation in the program is constitutional under the First Amendment. 531 U.S. 533 (2001). In *Legal Services Corp.*, a group of lawyers employed by the New York City Legal Services Corp., sought a declaration that Congress's imposition of a funding condition on legal services under the Legal Services Corporation Act was an unconstitutional restriction of their freedom of speech. *Id*. at 536. Congress's funding condition prohibited legal services corporations' use of federal funds to "amend or otherwise challenge existing welfare law." *Id*. In ruling that the funding condition of the Legal Services Corporation Act was unconstitutional, the Supreme Court focused on the purpose of the law. The law was "designed to facilitate private speech, not promote a governmental message." *Id.* at 542. Indeed, advice from legal services corporation attorneys to their clients, the Supreme Court concluded, "cannot be classified as governmental speech even under a generous understanding of the concept." *Id.* at 543.

As the Legal Services Corporation Act's purpose was to facilitate private speech, and as the speech in which legal services corporation attorneys were engaged was not governmental speech, the Supreme Court held that the law's funding condition was unconstitutional. In so holding, the Supreme Court, however, also acknowledged that "[w]hen the government disburses public funds to private entities to convey a governmental message, it may take legitimate and appropriate steps to ensure that its message is neither garbled nor distorted by the grantee." *Legal Servs. Corp.*, 531 U.S. 533, 541–42 (2001) (quoting *Rosenberger* v. *Rector and Visitors of Univ. of Va.*, 515 U.S. 819, 833 (1995)) (emphasis added).

In this case, DHS's purpose in entering into the Services Contract with CSS and its other foster care agencies is for CSS and the other twenty-nine foster care agencies to provide foster care services. The Services Contract is not intended here, in contrast to the Legal Services Corporation Act in *Legal Servs. Corp.*, to create a forum for private speech or to facilitate private speech. CSS and its sister agencies were hired to perform governmental functions for DHS and Philadelphia. That CSS's services under the Services Contract parallel many of DHS's own, provides support for the conclusion that CSS is performing governmental work, including the dissemination of governmental messages. For example, CSS is required under the Services Contract to recruit prospective foster parents, and, in fact, CSS has recruited prospective foster parents in much the same way that DHS has recruited prospective foster parents. *Compare* Jun. 18, 2018 Hr'g Tr. 65:14–19 (testifying that she saw television commercials soliciting prospective foster parents)) and Foster Care & Adoption Services, https://cssphiladelphia.org/adoption/ (last visited Jul. 1, 2018) (advertising CSS's foster care and adoption services to members of the public through a website) *with* Jun. 18, 2018 Hr'g Tr. 101:19–101:2 (Ali) (describing phone bank recruiting event) and Jun. 19, 2018 Hr'g Tr. 161:23–162:1 (Figueroa) (describing recruitment as a general foster-care responsibility). That CSS's work under the Services Contract was governmental in nature, is further supported by the fact that the Services Contract stipulated that written materials published by CSS relating to services rendered under the Services Contract were to identify DHS as a funding source. CSS's work under the Services Contract is, thus, an extension of DHS's own work and CSS's speech, to the extent any is required under the Services Contract, constitutes governmental speech under *Legal Servs. Corp.*

As CSS's speech, to the extent any is required under the Services Contract, constitutes governmental speech, DHS is permitted to "take legitimate and appropriate steps to ensure that

its message," that foster care services in Philadelphia are provided to all Philadelphians consistent with the all-comers provision of the Fair Practices Ordinance, was and is "neither garbled nor distorted by" CSS. *Legal Servs. Corp.*, 531 U.S. 541–42.

Plaintiffs rely on *Cradle of Liberty Council, Inc. v. City of Philadelphia*, in support of their argument that Defendants have impermissibly conditioned CSS's public contract on compelled speech. 851 F. Supp. 2d 936, 948 (E.D. Pa. 2012). Plaintiffs' reliance on *Cradle of Liberty*, however, is misplaced for at least two reasons. First, *Cradle of Liberty* is not binding on this Court. Second, *Cradle of Liberty* is otherwise not persuasive because the facts at issue in that case are not analogous to the facts at issue here. *Cradle of Liberty* concerned a Boy Scout troop that was using a city-subsidized building to carry out youth activities, all while refusing membership to prospective gay Boy Scouts. The City attempted to change the Boy Scout troop's general policy on membership for prospective gay Scouts by conditioning the lease of the building on a policy change. Ultimately, the district court concluded that the City could not use the lease to change the tenant Boy Scout troop's general policies when the policies were not related to the use of the building.

The critical difference between *Cradle of Liberty* and this case is that in *Cradle of Liberty*, the City attempted to use a lease agreement to change a tenant's policy that was unrelated to the lease. *See id.* at 943 (emphasis added) (providing that the City had informed the tenant that "it had to completely abandon its practice of denying membership to homosexuals, even in contexts unrelated to the subsidized building"). In this case, by contrast, Defendants' insistence that CSS serve all-comers consistent with the Services Contract is central to the purpose of the Services Contract. Defendants have not conditioned CSS's Services Contract on CSS changing its activities, views, opinions outside the context of the Services Contract. CSS

may continue to refuse its private services to same sex couples outside the confines of the Service Contract and outside of CSS's role as a DHS foster care agency.

ii. Retaliation

CSS concedes that "[a]s a contractor, Catholic Social Services is treated as 'akin to a government employee' addressing matters of 'public concern.'" Pls.' Br. 26, ECF No. 13-2. For a public employee, to prevail on a retaliation claim, the employee must show that "(1) his speech is protected by the First Amendment and (2) the speech was a substantial or motivating factor in the alleged retaliatory action, which, if both are proved, shifts the burden to the employer to prove that (3) the same action would have been taken even if the speech had not occurred." *Munroe v. Central Bucks Sch. Dist.*, 805 F.3d 454, 466 (3d Cir. 2015). The Third Circuit has noted that the "second and third stages of this analysis present questions for the fact finder and are not subject to review. *Baldassare v. New Jersey*, 250 F.3d 188, 194–95 (3d Cir. 2001) (citations omitted).

Plaintiffs' retaliation claim fails on elements two and three. There is no evidence that it was CSS's viewpoint, as opposed to CSS's verbal and written confirmation that its policies directly conflicted with the Services Contract, that motivated DHS to close CSS's intake of new referrals. Even if CSS's engagement in protected activity, namely CSS's commenting to the *Philadelphia Inquirer* about CSS's policies in connection with a public services contract, was a substantial or motivating factor for DHS's alleged retaliation, the Court concludes that DHS would likely prevail in establishing that it would have taken the same action had CSS not spoken with the *Philadelphia Inquirer* about its policies.

For purposes of this analysis, the Court assumes that CSS's statements to the *Philadelphia Inquirer* and the publication of those statements constitute constitutionally-

protected activity. Assuming that CSS has engaged in constitutionally-protected activity, the next analytical step is determining whether CSS's protected activity was a substantial or motivating factor in the alleged retaliatory action. While CSS would have the Court conclude that the evidence in the record shows that DHS closed CSS's intake of new referrals because of CSS's viewpoint as communicated to the *Philadelphia Inquirer*, in fact, the evidence shows that DHS closed CSS's intake of new referrals because CSS confirmed that its policies violate CSS's contractual obligations under the Services Contract. On this issue, the Eleventh Circuit's decision in *Keeton v. Anderson-Wiley* is instructive. 664 F.3d 865 (11th Cir. 2011).

In *Keeton*, the Eleventh Circuit confronted a situation in which the plaintiff, a graduate student in the Counselor Education Program at Augusta State University, sued the University for First Amendment violations after the faculty asked the plaintiff to complete a remediation plan before she could participate in the University's clinical practicum. 664 F.3d at 867. The faculty required the plaintiff to complete the remediation plan as a condition to her actively counseling students as part of a clinical practicum because the faculty learned that the plaintiff intended to "convert students from being homosexual to heterosexual" once the plaintiff obtained access to the clinic. *Id.* at 868–69. University officials concluded that the plaintiff's intended actions would violate various provisions of the American Counseling Association's Code of Ethics, a mandatory code of ethics for all universities providing counseling programs. *Id.* at 869. Ultimately, the plaintiff confirmed that she would not participate in any "remediation plan that I already know I won't be able to successfully complete." *Id.* at 871. The University then withdrew the plaintiff from the counseling practicum and the plaintiff filed suit. *Id.*

In concluding that the plaintiff's free speech rights had not been violated, the Eleventh Circuit focused on the evidence of why the University asked the plaintiff to engage in a

remediation plan and why the University ultimately withdrew the plaintiff from the counseling practicum. *Id.* The Eleventh Circuit explained that the plaintiff "confuse[d] her viewpoint-based objections to ASU's officials' actions with viewpoint discrimination." *Id.* at 875. In other words, the mere fact that the plaintiff disagreed with the legitimate reasons for the University's actions did not transform the University's legitimate actions into illegitimate retaliatory actions. Indeed,

> the evidence shows that, in requiring Keeton to learn about and interact with the GLBTQ population, to read articles in counseling or psychological journals about counseling the GLBTQ population, and to become familiar with the ALGBTIC Competencies for Counseling Gays and Transgender clients, ASU's officials sought to teach her how to effectively counsel GLBTQ clients in accordance with the ACA Code of Ethics.

Keeton, 664 F.3d at 874. The Eleventh Circuit reiterated elsewhere that:

> the record shows that ASU's officials imposed the remediation plan, not because she expressed her personal religious views regarding homosexuality, but because she was unwilling to comply with the ACA Code of Ethics. That this unwillingness to abide by ASU's curriculum and her chosen profession's ethical standards initially became apparent through her writings and class discussions does not cloak it in First Amendment protection.

Id. at 878 (emphasis added). Accordingly, the decision in *Keeton* demonstrates that a plaintiff lodging a First Amendment retaliation claim must establish a causal link between the alleged retaliation and that plaintiff's alleged protected activity. *See also Briscoe v. City of Philadelphia*, 1996 WL 684316 (E.D. Pa. Nov. 27, 1996) (concluding that a contractor who was not offered a new contract was not retaliated against as result of the contractor's testimony in court against a city program because the contractor failed to prove that decision not to offer her a new contract was causally linked to her protected activity).

Here, the evidence shows that DHS's closure of CSS's intake of new referrals was not based on CSS's viewpoint as expressed in the *Philadelphia Inquirer* article, but instead, based on CSS's admission that it would not comply with the all-comers provisions of the Services Contract. CSS misperceives the closure of its intake as having to do with its viewpoint in the same way the plaintiff in *Keeton* misperceived "her viewpoint-based objections to [the university's] officials' actions with viewpoint discrimination." 664 F.3d at 875. Although CSS expressed its position on same-sex relationships, it was not that expression that motivated DHS's actions. Instead, it was CSS's indication that it maintains a policy in direct conflict with its obligations under the Services Contract. *See, e.g.*, Jun. 19, 2018 Hr'g Tr. 120:7–11 (Amato) (emphasis added) (quoting from Defendants' letter indicating that Defendants do "not plan to agree to any further referrals to CSS . . . absent assurances that CSS is prepared to adhere to contractual obligations.").

Testimony established DHS's reason for closing intake. Commissioner Figueroa testified that she "decided that it was in the best interest [of children] to close intake, so that [Figueroa] could look more deeply into" CSS's and Bethany Christian Services's policies. Jun. 19, 2018 Hr'g Tr. 166:6–21 (Figueroa); Figueroa Decl. ¶ 32, ECF No. 20-6; *see also* Jun. 18, 2018 Hr'g Tr. 96:2–3 (Ali) (testifying that, to Ali's knowledge, Commissioner Figueroa herself decided to close CSS's intake of new referrals). CSS witness James Amato further testified that he understood that DHS's position was that CSS was "not complying with the public accommodation requirements" under the Services Contract. Jun. 19, 2018 Hr'g Tr. 60:11–13 (Amato); *see also* Jun. 19, 2018 Hr'g Tr. 56:9–13 (Amato) (testifying that he understood DHS's concerns were about CSS "not completing home studies for same-sex individuals and couples").

CSS is not reasonably likely to show that DHS retaliated against CSS for its religious views and comments relating to those views.

Even if CSS could establish that its engagement in protected activity was a substantial or motivating factor for DHS's decision to close intake and not offer CSS a new services contract, DHS would likely meet its burden under the third prong of the retaliation claim that it would have taken such action in the absence of CSS's protected activity. In addition to testimony that DHS would not permit any agency to refuse service to qualified Philadelphians protected by the all-comers provisions of the Fair Practices Ordinance, perhaps the strongest evidence that DHS would have taken the same course of action even in the absence of CSS's purported protected activity is the fact that DHS, indeed, took the same course of action in connection with Bethany Christian Services—who also made comments to the *Philadelphia Inquirer*, that has similar policies in contravention of its services contract. DHS also called all other faith-based agencies and a non faith-based agency to examine their policies on same-sex couples.

D. Irreparable Harm

Plaintiffs have identified five purported irreparable harms that will result absent injunctive relief: (1) violations of Plaintiffs' religious rights will result in irreparable harm as a matter of law, (2) violations of Plaintiffs' free speech right will result in irreparable harm as a matter of law, (3) without a new government services contract CSS will be forced to lay off staff and possibly shut down its operations entirely, (4) with the closure of CSS, the individual Plaintiffs and other CSS-certified foster parents will not be able to use their skills to foster children, and (5) the closure of CSS will result in a rise in the number of children in congregate care or DHS's overnight foster care room. The Court disagrees because these alleged harms are

either not present on these facts or are otherwise not irreparable for purposes of preliminary injunction analysis.

The first two harms to which Plaintiffs point are harms that would occur only if Plaintiffs First Amendment rights have been violated. As the Court explained at length above, Plaintiffs are unlikely to prevail on the merits of their First Amendment claims. Accordingly, while a loss of First Amendment freedom may be considered irreparable[33] these alleged harms are not present on the facts before the Court.

Plaintiffs' third alleged irreparable harm is the possibility that CSS, without a new government services contract, may lay off staff or shut down its operations. It is hornbook law that the "irreparable harm requirement is met if a plaintiff demonstrates a significant risk that he or she will experience harm that cannot adequately be compensated after the fact by monetary damages . . . this is not an easy burden." *Adams v. Freedom Forge Corp.*, 204 F.3d 475, 484–85 (3d Cir. 2000) (internal citations omitted); *see also Lehigh Valley Cmty. Mental Health Ctrs., Inc. v. Pa. Dep't of Human Servs.*, 2015 WL 6447171 at * 3 (E.D. Pa. Oct. 26, 2015) (concluding that "going out of business" and "thousands of clients . . . left without proper mental health care" did not meet the standard for irreparable harm). That this burden is particularly exacting was made clear in the Third Circuit's decision in *Instant Air Freight Co. v. C.F. Air Freight, Inc.*, 882 F.2d 797, 801 (3d Cir. 1989).

In *Air Freight*, the Third Circuit reversed a district court injunction prohibiting the respondent from terminating a pivotal contract with petitioner. *Id.* at 798. The contract

[33] *See McTernan v. City of York*, 577 F.3d 521, 528 (3d Cir. 2009) (noting that the district court "acknowledged that loss of First Amendment freedom for any period of time can be considered irreparable harm," but holding no First Amendment violation occurred where police arrested religiously motivated protesters who blocked access to a public performance stage and other facilities).

accounted for eighty percent of petitioner's business and, thus, the termination of the contract would have caused the petitioner to "lose the main portion of its business, many if not all of its employees, and its goodwill and reputation." *Id.* at 799. Termination of the contract, the petitioner claimed would "undoubtedly . . . force[] [the petitioner's] shutdown or significantly curtail its operation." *Id.* In reversing the district court's injunction order, the Third Circuit reviewed the petitioner's allegations of irreparable harm including the potential that it would lay off its employees, and close its operations. *Id.* at 802. The Third Circuit, however, was unconvinced that such harms could not be compensated by money damages since possible damages could be calculated with relative precision. *Id.*

As to CSS's claim it will be forced to lay off staff and close its operation unless the Court issues an injunction, the Court finds these harms are economic harms that are insufficient to meet the irreparable harm standard for a preliminary injunction. Evidence shows that CSS is compensated by DHS under the Services Contract and that CSS is paid on a per diem basis. *See* Decl. of James Amato Ex. A, ECF p. 15 of 52, ECF No. 13-3; Jun. 21, 2018 Hr'g Tr. 11:4–7 (Figueroa) (testifying that many contractors are paid on a per diem basis); Jun. 21, 2018 Hr'g Tr. 139:20–24 (same) (Figueroa); Jun. 19, 2018 Hr'g Tr. 41:5–6 (Amato) (testifying that CSS "subsidized [foster care] services to the tune of $3.8 million"). Given the Parties' familiarity of their financial relationship, the Court concludes that CSS's possible harm in the form of lost revenue under the Services Contract can be quantified and may be fully compensable through money damages.

Plaintiffs have also not established the imminence of their financial collapse in the absence of injunctive relief because CSS has testified that it also has foster care contracts with Montgomery County, PA and Bucks County, PA. Jun. 19, 2018 Hr'g Tr. 89:3–9 (Amato).

There are also interim financial arrangements that are available to CSS. DHS Commissioner Figueroa explained that in the past, when foster care agencies have shut down, DHS, in fact, has provided temporary funding to those foster care agencies to ensure smooth transitions of their staff, foster parents, and the children. Jun. 21, 2018 Hr'g Tr. 10:23–11:9 (Figueroa). Accordingly, the economic harms to which Plaintiffs point in support of injunctive relief are insufficient to meet the exacting standard of irreparable harm.

Plaintiffs' fourth alleged irreparable harm is the purported inability of CSS-certified foster parents to continue providing foster care services if CSS closed its operations and the foster parents were forced to transfer to other agencies. To prove this point, Plaintiffs called each of the four individual plaintiffs in this case to testify to the harms that they would expect to suffer if CSS closed its operations. Ms. Simms-Busch testified that if CSS closed its foster program that she, as of the time of the hearing, had "no idea" how she or her foster children would be impacted. Jun. 18, 2018 Hr'g Tr. 52:16–23 (Simms-Busch). Ms. Simms-Busch also was unsure whether she could or could not transfer to another foster care agency. Jun. 18, 2018 Hr'g Tr. 53:2–7 (Simms-Busch). Ms. Paul likewise was unsure what impact CSS's closure would have on her ability to provide foster care and was unsure whether she could or could not transfer to another foster care agency. Jun. 18, 2018 Hr'g Tr. 63:11–25 (Paul). Ms. Fulton was similarly unsure what impact CSS's closure would have on her provision of foster care, though she would be emotionally devastated. Jun. 18, 2018 Hr'g Tr. 68:20–23 (Fulton). Each of the individual plaintiffs expressed that CSS's closure would be emotionally burdensome.

While transferring to another agency may be difficult, uncertain, and emotionally challenging, transferring to other agencies is neither impossible nor unlikely to be successful.

Decl. Kimberly Ali ¶¶ 27–29, ECF No. 20-1 (explaining the process by which resource parents transfer from one agency to another); Decl. Kimberly Ali ¶¶ 34–36, ECF No. 20-1 (describing how Lutheran Children and Family Service of Eastern Pennsylvania's voluntary closure was handled and explaining that there were no significant issues in transferring families to other agencies). The Third Circuit, although acknowledging how individuals can suffer mental anguish in connection with litigation, has held that emotional difficulty alone cannot justify the imposition of an injunction.

In *Adams*, the Third Circuit concluded that even where the denial of injunctive relief would force patients to switch doctors and medical providers and that such a switching of doctors would prove "emotionally draining" and could present some medical risk, such harms were not the type of irreparable harm "contemplated by the preliminary injunction standard." 204 F.3d at 489. The Third Circuit continued stating that "injunctions will not be issued merely to allay the fears and apprehensions or to soothe the anxieties of the parties." *Id.* at 490. In this case, in the event CSS closes its operations, the individual plaintiffs and other non-party CSS-certified resource parents may transfer to other agencies and continue using their skills to provide foster care to children, even though such transfers may be challenging.

Finally, Plaintiffs argue that in the event CSS closes its operations, the number of children in congregate care living situations will increase or the number of children in DHS's overnight foster care room will increase. As provided above, in connection with the factual background of this case, DHS has shown that the closure of CSS's intake of new referrals has had little or no effect on the operation of Philadelphia's foster care system. DHS Commissioner Figueroa testified that CSS's intake closure "has not resulted in a rise in children placed in congregate care." Jun. 21, 2018 Hr'g Tr. 86:4–87:9 (Figueroa). Further Commissioner Figueroa

testified that CSS's intake closure "has not resulted in a rise in children staying in DHS's childcare room." Jun. 21, 2018 Hr'g Tr. 86:4–87:9 (Figueroa). Figueroa's testimony was based on her review of "weekly data" that Figueroa receives from DHS's "performance and technology team that . . . have . . . detailed data." Jun. 21, 2018 Hr'g Tr. 86:16–87:11 (Figueroa). To the extent CSS closes its operations, it would not be the first foster agency to do so in Philadelphia. Decl. Kimberly Ali ¶¶ 34–36, ECF No. 20-1 (explaining that Lutheran Children and Family Service of Eastern Pennsylvania closed its operations in March 2016 and its over 100 foster children were transferred to other foster agencies over a three-month period). Plaintiffs have not established with sufficient evidence that irreparable harm in the form of increased use of congregate care or the DHS overnight foster care room will result absent an injunction.

E. Balancing Of The Harms And The Public Interest

As the Court has concluded that Plaintiffs are not likely to succeed on the merits of their claims and have presented insufficient evidence of irreparable harm, the Court need not spend undue time analyzing the remaining two factors of the preliminary injunction standard—balancing of the equities, and the public interest. *See Reilly*, 858 F.3d at 180 (providing that the first two factors of the preliminary injunction standard are gateway factors).

In connection with the balancing of harms prong of the analysis, Defendants called Frank Cervone as an expert to testify to the harms that might occur if the Court granted injunctive relief.[34] The Parties disagree on whether Cervone's testimony should be considered for a variety of reasons. The Court, however, need not, and has not relied on Cervone's testimony in deciding

[34] Cervone serves as the executive director of the Center for Child Advocates. Jun. 21, 2018 Hr'g Tr. 153:5–9 (Cervone). Cervone has had, and continues to have, a long and distinguished career in advocating for children. The Court thanks Mr. Cervone for his dedication to a life of public service.

the Injunction Motion, and therefore, the Court will not address the Parties' arguments on the propriety of Cervone's testimony.

Here, even in the absence of Cervone's testimony, the balance of the equities tilts in favor of Defendants. If the Court were to grant Plaintiffs' Injunction Motion, the Court would, in essence, cast aside DHS's and Philadelphia's reasonable objectives in seeking the enforcement of the Services Contract and the Fair Practices Ordinance incorporated into the Services Contract. As discussed in connection with Plaintiffs' claim under the Free Exercise Clause, Defendants' interests in this case are manifold, but at a minimum, include six important governmental objectives.

First, DHS and Philadelphia have a legitimate interest in ensuring that when contractors agree to terms in a government contract, the contractors adhere to those terms. Second, DHS and Philadelphia have a legitimate interest in ensuring that when its contractors voluntarily agree to be bound by local laws, the local laws are enforced. Third, DHS and Philadelphia have a legitimate interest in ensuring that when they employ contractors to provide governmental services, the services are accessible to all Philadelphians who are qualified for the services. Fourth, in the context of foster care and adoption, DHS and Philadelphia have a legitimate interest in ensuring that the pool of foster parents and resource caregivers is as diverse and broad as the children in need of foster parents and resource caregivers. Fifth, DHS and Philadelphia have a legitimate interest in ensuring that individuals who pay taxes to fund government contractors are not denied access to those services. Sixth, DHS and Philadelphia have an interest in avoiding likely Equal Protection Clause and Establishment Clause claims that would result if

it allowed its government contractors to avoid compliance with the all-comers, nondiscrimination provisions of the Fair Practices Ordinance by discriminating against same-sex married couples.[35]

Granting an injunction in the face of the foregoing legitimate interests would be in direct conflict with the balance of harms and the public interest. Accordingly, the Court concludes that the balance of harms and the public interest militate in favor of denying the Injunction Motion.

V. CONCLUSION

For the reasons set forth above, and having considered all four factors implicated by the preliminary injunction standard, Plaintiffs' Amended Motion for Temporary Restraining Order and Preliminary Injunction (ECF No. 13) is **DENIED**. An appropriate Order follows.

[35] Preventing discrimination in the provision of public services is undeniably a legitimate interest. As the Supreme Court in *Heart of Atlanta Motel, Inc. v. United States* proclaimed:

> Discrimination is not simply dollars and cents, hamburgers and movies; it is the humiliation, frustration, and embarrassment that a person must surely feel when he is told that he is unacceptable as a member of the public because of his race or color. It is equally the inability to explain to a child that regardless of education, civility, courtesy, and morality he will be denied the right to enjoy equal treatment, even though he be a citizen of the United States and may well be called upon to lay down his life to assure this Nation continues.

379 U.S. 241, 292 (1964).

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARONELL FULTON, et al.,	:	
	:	
Plaintiffs,	:	**CIVIL ACTION**
	:	
v.	:	**NO. 18-2075**
	:	
CITY OF PHILADELPHIA, et al.,	:	
	:	
Defendants.	:	

ORDER

AND NOW, this __13th__ day of July, 2018, upon careful consideration of Plaintiffs' Motion For A Temporary Restraining Order And Preliminary Injunction ("Injunction Motion") (Doc. 13), The City Of Philadelphia's Memorandum Of Law In Opposition To Plaintiffs' Motion For Temporary Restraining Order And Preliminary Injunction (Doc. 21), Proposed Intervenors' Memorandum of Law, Or, In The Alternative, Amicus Brief, In Opposition To Plaintiffs' Motion For A Temporary Restraining Order And Preliminary Injunction ("Amicus Brief") (Doc. 34),[1] the matters heard at the evidentiary hearings, and Defendants' Proposed Findings Of Facts And Conclusions Of Law (Doc. 45), and Plaintiffs' Proposed Findings Of Fact And Conclusions Of Law (Doc. 46), **IT IS HEREBY ORDERED AND DECREED** that Plaintiffs' Injunction Motion is **DENIED**.[2]

[1] On June 18, 2018, the Court accepted the Intervenors' Opposition Brief as an amicus brief. The Court's decision was memorialized by an order dated June 19, 2018 (Doc. 33).
[2] This Order accompanies the Court's Memorandum Opinion dated July 13, 2018.

IT IS FURTHER ORDERED that Defendants City of Philadelphia, Department of Human Services for the City of Philadelphia, and Philadelphia Commission on Human Relations shall file an answer or otherwise respond to Plaintiffs' Complaint (Doc. 1) no later than **twenty-one (21) days** from the date of this Order.

BY THE COURT:

/s/ Petrese B. Tucker

Hon. Petrese B. Tucker, U.S.D.J.

EXHIBIT 4

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH, and CATHOLIC SOCIAL SERVICES, *Plaintiffs*, v. CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, and PHILADELPHIA COMMISSION ON HUMAN RELATIONS, *Defendants*.	Civil Action No. 18-cv-2075 Assigned to the Honorable Judge Tucker

DECLARATION OF JAMES AMATO

1. My name is James Amato. I am over the age of 21 years old and capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or been convicted of a crime of dishonesty. I have personal knowledge of all the contents of this declaration.

2. The City of Philadelphia is facing a crisis because of the acute shortage of qualified families available to care for the thousands of vulnerable children who have been removed from abusive or neglectful homes and placed in foster care. The City relies on private foster agencies to help fill this shortage. In March of this year, the City sent out an "urgent" call that 300 additional families are needed for fostering.

3. Catholic Social Services exists to help fill this need. For over 100 years, the Archdiocese of Philadelphia has worked to provide loving foster homes for needy children. This continues today through the work of Catholic Social Services (CSS), a non-profit religious corporation under the auspices of the Archdiocese. CSS has contracted with the City on an annual basis for over 50 years. On an average day, Catholic Social Services serves more than 120 children in foster care, and it supervises around 100 different foster homes.

4. Through its contract with the City, CSS placed these children in loving foster homes—many of whom have worked exclusively with CSS for decades. CSS also provides ongoing support to its foster families. In all this time, the City has never suspended referrals to Catholic Social Services as long as CSS had homes available, nor has it sought to either construe the contract to require CSS to do home studies for same-sex couples or to enforce such a construction against Catholic Social Services. A true and correct copy of this contract is included as Attachment A.

5. There are 28 state-licensed agencies who partner with the City to provide additional services to foster children. Of those agencies, eight obtained additional competitive contracts with the City to also serve as a Community Umbrella Agency (CUA), an entity that works to try to help at-risk children stay in their homes where such an option would be possible and safe for the child. If that option is not available, the CUA refers the child to be placed in foster care. Of the select agencies in the City who obtained additional competitive contracts to serve foster children and families, the City ranked CSS as the second highest of all agencies.

6. Foster care services involve placing children with foster families who have already undergone extensive interviews and home studies by social workers at the agency. The agency makes a determination whether a particular foster family would be an appropriate family to care for foster children. After these interviews, home studies, and evaluations, an agency may provide a written certification endorsing a specific foster family to care for foster children, including thorough analysis and a written endorsement of any relationships of the foster parents. No same-sex couple has ever requested CSS to provide such a written certification for foster care services.

7. State law does not prohibit foster agencies from declining to perform a home study, nor from referring families to another licensed agency to perform a home study. And in fact, foster care agencies have referred families to other agencies regularly for a number of secular reasons including 1) geographic constraints, such as proximity of an agency to the child's biological home or current school, 2) the expertise of an agency for particular medical needs, 3) the expertise of an agency to address particular behavioral issues, 4) agencies focused on finding foster placements for pregnant youth, and 5) the expertise of an agency focused on homes under the City's "kin care" program. Some agencies also specialize in finding families who want to foster LGBT youth, including an agency located in suburbs near Philadelphia. Other agencies specialize in placing Native American children with families of Native American lineage.

8. Because of its religious mission, CSS would also refer a family to one of over two dozen nearby agencies if providing a written certification for that family would violate CSS's religious beliefs. In fact, four such agencies are located within two miles of CSS's downtown office. Catholic Social Services has provided foster services consistent with its religious beliefs, without complaint, as long as it has been operating.

9. On March 15, in response to a newspaper article discussing Catholic Social Services' religious beliefs, the City abruptly cut off foster care referrals to CSS, and has threatened to make it impossible for CSS to continue contracting with the City to provide these services as of June 30, 2018. Only two religious foster care agencies have been subject to contract suspensions by the City, even though a number of other religious groups operate foster care agencies.

10. Also on March 15, the Philadelphia City Council passed a resolution alleging that some foster service providers prohibit the placement of children with LGBTQ people based on religious principles and calling for an investigation. A true and correct copy of this resolution is included as Attachment B. Catholic Social Services has provided foster services consistent with its religious beliefs, without complaint, as long as it has been operating.

11. On March 16, the Commission on Human Relations (Commission) sent a letter to Catholic Social Services, to which CSS later responded. A true and correct copy of the Commission's letter is included as Attachment C; a true and correct copy of Catholic Social Services' response is included as Attachment D. On March 27, the

Operations Director at the City's Department of Human Services (DHS), sent an email to other foster agencies in Philadelphia forbidding them from referring any additional foster intakes to Catholic Social Services. A true and correct copy of this email is included as Attachment E.

12. On May 7, the Commission and the City's Law Department responded to Catholic Social Services' April 18th letter (Attachment D), defending the City's actions and stating that CSS would face subpoenas and further adverse actions under the contract in 10 days. True and correct copies of these letters are included as Attachments F and G, respectively.

13. If the City persists in these actions, the consequences will be severe. Currently, CSS has about 26 available spots for foster children in need of a home, and this number is projected to increase to about 35 spots by the end of June 2018. Additionally, about a dozen foster homes currently sit completely empty because CSS cannot receive any referrals, and therefore cannot place any children with these loving parents. The number of foster parents, like Mrs. Paul, who are willing and anxious to care for foster children but are unable to do so at all because of the City's actions, will increase to about 20 by the end of June. This number is expected to accelerate quickly if the City's actions continue, as CSS on average would receive about 9 additional referrals from the City every month prior to the current referral freeze.

14. If the City makes renewal of the contract impossible on June 30, then many current placements will be in jeopardy. Children who are already at a

vulnerable point in their lives stand to have those lives disrupted again, since their foster parents are certified and supported by CSS and cannot automatically receive foster placements and support from another agency.

15. The City's current actions are resulting in placements being made that are not in the best interest of children. A court has already had to order the City to place a child with the former foster mother of that child—a mother working with CSS. And right now, an urgent situation is ongoing where the City is refusing to place a special needs child, referred to as Doe Foster Child #1, with his former foster mother named Doe Foster Mother #1, even though no other permanent home for the child is currently available and the child is languishing in temporary respite homes. Included as Attachment H is a true and correct copy of the email a social worker at Catholic Social Services sent seeking to resolve this situation. My understanding is that under normal circumstances, Doe Foster Child #1 would have been placed with his former foster mother almost immediately after he was removed from the other home due to an emergency, and no court order or court determination would have been necessary since she was the only permanent home available. The CUA assigned to Doe Foster Child #1 has expressed the position that it would be in Doe Foster Child #1's best interest to return to Doe Foster Mother #1's care, as she is prepared to adopt Doe Foster Child #1. I am aware that the Child Advocate with the Philadelphia Defender Association assigned to Doe Foster Child #1's case has also expressed her opinion that the child should be returned to Doe Foster Mother #1's care. Yet DHS is still resisting

this outcome. The reason DHS provided to Doe Foster Child #1's social worker for denying the placement was the City's current dispute with Catholic Social Services.

16. I am aware of multiple additional children who have been referred elsewhere when CSS families should have been the preferred placement for those children as a result of the City's freeze on referrals to CSS.

17. If the City continues refusing to refer children to CSS, or if the City fulfills its threat to permanently end CSS's foster care service to Philadelphia children on June 30th, CSS will probably have to close its foster program and immediately lay off the staff involved in this program. Relying on its contract with the City, CSS has hired 15 staff members dedicated exclusively to its foster services program and has budgeted and raised funds designed to supplement the City's funding for foster care. Were CSS forced to close this program, CSS would also lose the network of foster families it has carefully cultivated over the years. Restarting this program later from scratch would be incredibly difficult, and likely impossible. Even if a new contract were not signed by June 30th, however, CSS could continue operating under the current contract if referrals resume. It is commonplace for CSS to continue operating under an old contract in agreement with the City until a new contract could be drafted and signed. True and accurate signature pages from prior contracts showing the date of ratification are included as Attachment I.

18. Attachment J is a true and correct copy of an article entitled *Chaput edict draws mixed reviews; Kenney calls it 'not Christian'*, visited on June 4, 2018,

and available at http://www.philly.com/philly/news/20160707_Chaput_edict_draws_mixed_reviews__Kenney_calls_it__not_Christian_.html.

19. Attachment K is a true and correct copy of an article entitled *Jim Kenney's Long War with the Archdiocese*, visited on June 4, 2018, and available at https://www.phillymag.com/citified/2015/07/09/jim-kenney-catholic-archdiocese-charles-chaput/#Ipkpzv0aRJyCyIrL.99.

20. Attachment L is a true and correct copy of an article entitled *Project Discovery by Crossroads*, last visited on June 4, 2018, and available at http://crossroadsprograms.org/wp-content/uploads/2016/07/Project-Discovery-Brochure.pdf.

21. Attachment M is a true and correct copy of an article titled *Crossroads Programs Inc: LGBTQ Focused Services*, last visited on June 4, 2018, and available at https://www.mightycause.com/organization/Crossroads-Programs.

22. Attachment N is a true and correct copy of an article titled *Local Organization Seeks Foster Parents for LGBTQ Youth*, list visited on June 4, 2018, and available at https://www.phillymag.com/g-philly/2014/05/28/local-organization-seeks-foster-parents-lgbtq-youth/.

23. Attachment O is a true and correct copy of an article titled *N.J. Youth Agency Looks to Match LGBT Adults, Teens*, last visited on June 4, 2018, and available at http://www.epgn.com/news/regional/7396-25314381-nj-youth-agency-looks-to-match-lgbt-adults-teens.

24. Attachment P is a true and correct copy of a website titled *Mother/Baby Host Home*, last visited on June 4, 2018, and available at https://www.pa-mentor.com/who-we-serve/children-and-families/motherbaby-host-home/.

25. Attachment Q is a true and correct copy of a website titled *Therapeutic Foster Care*, last visited on June 4, 2018, and available at https://www.pa-mentor.com/who-we-serve/children-and-families/therapeutic-foster-care/.

26. Attachment R is a true and correct copy of a document titled *Pennsylvania Indian Child Welfare Handbook*, last visited on June 4, 2018, and available at http://www.pacwrc.pitt.edu/ICWA/Indian%20Child%20Welfare%20Handbook.pdf.

27. Attachment S is a true and correct copy of a website titled *Welcome to Rainbow Adoptions*, last visited on June 4, 2018, and available at http://www.cotraic.org/adopt.html.

28. Attachment T is a true and correct copy of a document titled *Quarterly Indicators Report*.

29. Attachment U is a true and correct copy of an article titled *Philly halts foster placements with 2 faith-based agencies shutting out LGBT couples*, last visited on June 4, 2018, and available at https://whyy.org/articles/philly-halts-foster-placements-2-faith-based-agencies-shutting-lgbt-couples/.

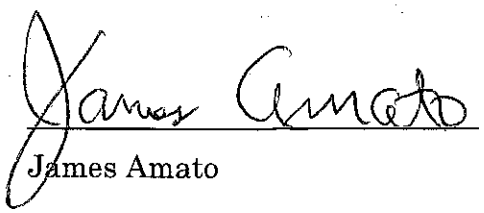
30. Attachment V is a true and correct copy of testimony entitled *Education Interrupted: How We Are Failing Our Children in Residential Placements*, last visited on June 4, 2018, and available at https://www.elc-pa.org/wp-

content/uploads/2018/05/ELC-Testimony-Before-City-Council-Re-Residential-Placements-May-17-2018.pdf.

31. Attachment W is a true and correct copy of an article entitled *Two foster agencies in Philly won't place kids with LGBTQ people*, last visited on June 4, 2018, and available at http://www.philly.com/philly/news/foster-adoption-lgbtq-gay-same-sex-philly-bethany-archdiocese-20180313.html.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2018.



James Amato

EXHIBIT 5

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH, and CATHOLIC SOCIAL SERVICES, *Plaintiffs*, v. CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, and PHILADELPHIA COMMISSION ON HUMAN RELATIONS, *Defendants*.	Civil Action No. 18-cv-2075 Assigned to the Honorable Judge Tucker

SUPPLEMENTAL DECLARATION OF JAMES AMATO

1. My name is James Amato. I am over the age of 21 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or been convicted of a crime of dishonesty. I have personal knowledge of all the contents of this declaration.

2. The City asked to hold a meeting with Catholic Social Services ("Catholic") representatives regarding potential contract options on June 28, 2018. Catholic remains committed to providing foster care services if possible, and I communicated Catholic's desire to continue doing so in this meeting.

3. The City indicated a willingness to pay *per diem* amounts for foster children currently cared for by Catholic's families. But the City remains unwilling to

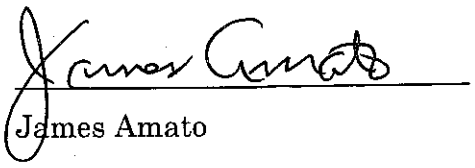
resume normal operations with Catholic, meaning it will not agree to reopen intake to send foster children to Catholic to place with its growing number of empty foster homes.

4. Without intake resuming, any interim approach will require Catholic to begin laying off staff next month and to close its foster care program altogether within a matter of months. This will result in the displacement of foster children who need to remain in foster care and who are cared for by families who cannot continue as foster parents without the support that Catholic offers.

5. Catholic also explored whether there is any option available for compliance that would enable Catholic to receive the full foster care contract it has received in the past. The City made clear that for Catholic to receive a full contract, Catholic must agree not only to be willing to perform home studies for anyone who requests a home study, but also to ensure that the outcome of a home study would be an endorsement and certification of the relationship of a same-sex couple. The City made clear that Catholic's religious beliefs would not be an acceptable basis for Catholic's unwillingness to provide a written certification regarding a couple's relationship and to approve that couple for foster care.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 28, 2018.



James Amato

EXHIBIT 6

The Honorable Petrese B. Tucker
United States District Court for the Eastern District of Pennsylvania
U.S. Courthouse
601 Market Street
Philadelphia, PA 19106-1790

VIA ECF

Re: Additional Foster Care Placements and Staff Reductions

Dear Judge Tucker:

We write to advise the Court of two urgent situations that have arisen since the hearing because of the City's ongoing intake freeze.

First, Catholic has learned that the City urgently needed to move two siblings from their current kincare placement to a new placement. A court ordered that the two siblings be kept together, and the City's stated deadline by which the children needed to be moved in their best interest was July 1, but the difficulty in finding a family to take both siblings caused the City to miss this deadline.

Catholic has a certified foster family who is interested in caring for these two siblings. That family has a connection with the children's family, a relationship of the type which the City has considered to qualify as a kincare placement. After the City missed the deadline, the available kincare family learned of the situation. They notified the CUA that had been searching for a home for these children, and the CUA requested—twice—that the Central Referral Unit place the siblings with this family. That placement was denied by a CRU administrator because the available kincare family was certified through Catholic. Because of this denial, the children in question remained in a sub-optimal placement even longer, rather than joining a loving and available kincare foster family.

Catholic did not learn of this situation—or the denial—until after the fact. Yesterday afternoon, leadership at Catholic contacted the DHS Commissioner seeking to override the CRU Administrator's refusal in the best interest of these children. Due to Catholic's direct intervention, DHS leadership permitted the placement. But—as evidenced by the initial denial—it appears that DHS still has not told its staff, or even its CRU administrators, that exceptions to the intake freeze should be made to allow referrals to Catholic when it is in the child's best interest. While DHS eventually acted the child's best interest once Catholic became aware of the situation and elevated it, the ongoing freeze delayed yet more children from getting to appropriate homes, and it is impossible to know how many other children are in similar circumstances.

An injunction from this Court resuming regular referrals would prevent this type of situation from arising in the future. Without an injunction, situations like this one will continue to recur, with families and children being left in limbo, only reaching the correct placements when and if Catholic happens to find out and successfully petition DHS management to override DHS's initial refusal.

Second, Catholic writes to advise the Court of the loss of two employees from Catholic's foster care program. Due to the City's intake freeze, Catholic's foster program could not continue to support these employees. The employees left the program on June 26th and 29th.

Fortunately, in this instance, Catholic could offer these employees a transfer to other programs within the Archdiocese, but a job transfer was not the employees' first choice, and Catholic does not have the openings to continue this practice for the foster program's remaining staff. As long as the intake freeze continues, Catholic's foster program will be forced to lay off additional employees. As discussed in the Amato declaration and at the hearing, the loss of the knowledge and expertise of these employees will be a serious blow to Catholic's foster care program, one that will likely be impossible to repair.

Respectfully submitted,

/s/ Mark Rienzi
Mark Rienzi
Counsel for Plaintiffs

Certificate of Service

I hereby certify that this letter has been served electronically via ECF and is available for viewing and downloading from the ECF system.

/s/ Mark Rienzi
Mark Rienzi

EXHIBIT 7

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH, and CATHOLIC SOCIAL SERVICES, *Plaintiffs,* v. CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, and PHILADELPHIA COMMISSION ON HUMAN RELATIONS, *Defendants.*	Civil Action No. 18-cv-2075 Assigned to the Honorable Judge Tucker

DECLARATION OF SHARONELL FULTON

1. My name is Sharonell Fulton. I am over the age of 21 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or been convicted of a crime of dishonesty. I have personal knowledge of all of the contents of this declaration.

2. I am a foster parent who works with Catholic Social Services. I have fostered more than 40 children over 25-plus years as a foster parent. I have cared for children with significant medical needs and am currently caring for two special needs foster children.

3. Catholic Social Services has provided me with training, resources, support, and professional guidance as to how to best care for special needs children.

I have been able to call social workers at any hour and receive an answer from someone I knew and trusted. These social workers have become like family to me and have shown great love and care to my foster children. By contrast, I previously received training from a government agency, and I noted the stark difference between the way that agency treated me and Catholic Social Services' care and compassion.

4. To provide an example of the type of support I receive from Catholic Social Services, in 2010 I received a late-night request to take four foster children into my home the day before Christmas Eve. The children had been removed into foster care because of an emergency situation [redacted]. The City dropped these children off on my doorstep with nothing but the insufficient clothing they had on their backs, and these children were on the verge of starvation themselves. The City provided me with no other support or resources, and I am not a person of financial means. I was very worried about how to meet the very basic needs of these children, let alone provide a happy Christmas for them after everything they had gone through. But the next day, Catholic Social Services workers showed up on my doorstep to provide encouragement, assistance, and financial resources so that I could buy much needed food, clothing, bedding, and even gifts for these children. This is not the type of support I believe I would receive from other agencies, but it was critical for me to be able to provide the love and care that these children needed.

5. To provide another example, years ago I received two young brothers, ages five and seven, [redacted]

[redacted]. These boys lived in my home as foster children their entire childhood and I raised them as my own sons. I believe that I would not receive the kind of support I need to serve children, particularly children such as these boys or my current foster children with serious special needs or medical problems, if I were with another agency.

6. I am aware that other foster parents have been unsatisfied with the support they have received from other foster agencies.

7. If Catholic Social Services is no longer contracted with the City, my two current foster children with special needs may be transferred out of my home. Because of their extensive medical needs, I anticipate that these children will have a very difficult time being placed, and it is very unlikely they will be placed with a foster parent that has the same capacity and training to address these special needs as I do. It also took me quite some time to help these children learn that they could trust me and accept my love and care. Finding a new home for these children will not be an easy task, and I worry every night about what will happen to them.

8. I share the religious beliefs of Catholic Social Services. It is insulting and hurtful for me to observe the government of the city in which I live needlessly denigrate and publicly condemn my own religious beliefs in such a discriminatory fashion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2018.

Sharonell Fulton

EXHIBIT 8

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH, and CATHOLIC SOCIAL SERVICES, *Plaintiffs*, v. CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, and PHILADELPHIA COMMISSION ON HUMAN RELATIONS, *Defendants*.	Civil Action No. 18-cv-2075 Assigned to the Honorable Judge Tucker

DECLARATION OF CECELIA PAUL

1. My name is Cecelia Paul. I am over the age of 21 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or been convicted of a crime of dishonesty. I have personal knowledge of all of the contents of this declaration.

2. I am a foster parent who has worked with Catholic Social Services for 46 years and who has fostered 133 children. I was honored by the City as one of its Foster Parents of the Year for my excellent care. Caring for children in need is what gives life meaning to me. I first began caring for children when I worked as a nurse. My religious beliefs inspired me to make serving children my life's work. These religious beliefs also inspired me to work with Catholic Social Services, and the social

workers at this agency have become like family to me. I trust them, rely on them, and I cannot imagine starting from scratch and fostering children without them.

3. Because the City is no longer referring children to families who work with Catholic Social Services, as of April 1 am no longer caring for foster children in need.

4. No longer caring for foster children has left a void in my life and has left me unable to fulfill my religious commitment to give of myself and show love to those most in need. My home will remain empty of foster children as long as the City continues refusing to refer foster children to Catholic Social Services.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2018.

Cecelia Paul

EXHIBIT 9

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH, and CATHOLIC SOCIAL SERVICES, *Plaintiffs*, v. CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, and PHILADELPHIA COMMISSION ON HUMAN RELATIONS, *Defendants*.	Civil Action No. 18-cv-2075 Assigned to the Honorable Judge Tucker

DECLARATION OF TONI LYNN SIMMS-BUSCH

1. My name is Toni Lynn Simms-Busch. I am over the age of 21 and am capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or been convicted of a crime of dishonesty. I have personal knowledge of all of the contents of this declaration.

2. I previously worked as a foster care social worker with a private agency, and then later as a child advocate social worker for four years at the Defender Association of Philadelphia. I obtained my bachelor's degree in forensic psychology from Chatham University in Pittsburgh. In my prior role as a child advocate social worker with the City of Philadelphia, I interacted with all of the foster agencies in the City. I observed that some of the agencies offered high-quality services, and others

were at the other end of the spectrum. I observed that Catholic Social Services consistently was among the best of any foster agency in terms of the quality of services they provided, and they operated with the highest level of integrity, professionalism, responsiveness, and care.

3. I am now a foster parent myself, caring for two very young foster children who are biological siblings. I chose to work with Catholic Social Services because I observed their high-level care in the past, and because of my desire to raise my family with an organization that shared my religious beliefs. I am inspired by my religious beliefs to serve children, which is why I found my previous work as a child advocate so rewarding. I am continuing that religiously-motivated practice of serving vulnerable children now as a foster mother.

4. Fostering is often a very emotionally exhausting process, and I could not imagine continuing on this journey without the support I receive from Catholic Social Services. In my interactions with other agencies, I have not received this same level of personal care and loving encouragement. It is possible that in the future, a biological sibling of my foster children will need foster care, and I would be very open to fostering this child if I could work with Catholic Social Services. I am very open to fostering other children in need in the future as well.

5. If Catholic Social Services were forced to close its program, however, I think it is highly unlikely that I would be able to continue fostering. It would be devastating for me if I were no longer able to continue caring for foster children. It

would also be very disruptive for me and my family if I could no longer rely on Catholic Social Services.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2018.

Toni Lynn Simms-Busch

EXHIBIT 10

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH, and CATHOLIC SOCIAL SERVICES, *Plaintiffs*, v. CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, and PHILADELPHIA COMMISSION ON HUMAN RELATIONS, *Defendants*.	Civil Action No. 18-2075 Assigned to the Honorable Judge Tucker

DECLARATION OF DOE FOSTER MOTHER #1

1. I am over the age of 21 years old and capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or been convicted of a crime of dishonesty. I have personal knowledge of all of the contents of this declaration.

2. I am a foster parent who works with Catholic Social Services. I have fostered fourteen children over eighteen years as a foster parent, and I have adopted two of them. Some of the children I have cared for have had significant special needs and learning disabilities. For example, more than one of the children I have cared for was diagnosed with autism.

3. Catholic Social Services has provided me with significant support and resources to help me care for the needs of my foster children, and they also provided me with additional help as I worked to meet the needs of my autistic foster children. I have been able to call social workers at any hour and receive an answer from someone I knew and trusted, and I have always relied heavily on the social workers I interact with. These social workers have always demonstrated the highest level of care and have shown great love and attention to my children. Although I am not Catholic, I am a religious person and I appreciate the spiritual environment at Catholic Social Services and the way that seems to motivate a dedication to children. My own religious beliefs inspire me to want to care for children in need.

4. I have never worked with another foster agency and I am not certified to receive foster placements through any other agency. I want to continue working with the agency and social workers whom I trust.

5. I received a new foster son, Doe Foster Child #1, in October of 2016. Doe Foster Child #1 is a young child, but he is the age that other children have normally already started speaking in full sentences. However, when Doe Foster Child #1 came to my home he never spoke at all in the beginning. He also had great difficulty eating, and he was very fearful of other normal activities like taking a bath. Because he did not speak, it was also difficult to understand in the beginning what Doe Foster Child #1 needed. After consultation with my Catholic Social Service social workers, and with medical attention, Doe Foster Child #1 was diagnosed with autism. Because of Doe Foster Child #1's age, we do not know yet Doe Foster Child #1's level on the

autism spectrum. We began to take Doe Foster Child #1 to receive therapy for autism, and we also had more information about how to meet Doe Foster Child #1's needs.

6. In the months after coming to our family, Doe Foster Child #1 began to show remarkable progress. He began to say some words, like "hi" and "bye," he would play happily in the bath, and he showed great affection and attachment to our family members. Doe Foster Child #1 is also the same age as my grandson who lives with me. The two boys shared a room and developed a deep bond. I would often find them playing together in the backyard.

7. On one occasion, one of my adult children took Doe Foster Child #1 to the dentist for an appointment. Doe Foster Child #1 was so fearful and upset when he thought he would be taken from our family. But when he came back after the appointment he bolted out of the car and into the house and held me tight as he happily and repeatedly said, "hi, hi." I assured him that this was his home, that he did not need to worry, that I loved him, and everything was ok.

8. When I have adopted foster children in the past, one of my adult children co-signed on the adoption. That way if anything ever happened to me, I had peace of mind knowing that my adopted child would still be taken care of.

9. Within the last few months, Doe Foster Child #1's social worker asked if I wanted to adopt Doe Foster Child #1. He said that no other families were interested in adopting. I expressed interest in adopting, but I explained that I needed to consult with my adult children and figure out who would co-sign on Doe Foster

Child #1's adoption. Because of different events going on in the lives of my adult children, I knew that this would take some time.

10. Just a few weeks ago, Doe Foster Child #1 was removed from my home to be placed with another foster family who was immediately ready to adopt Doe Foster Child #1 I was heartbroken when this happened. I thought that I would have more time and be able to adopt Doe Foster Child #1 myself. When the social worker with the CUA in charge of Doe Foster Child #1 came to pick him up to take him away, I kissed him goodbye and told him how much I loved him. But every time the social worker tried to lead Doe Foster Child #1 out of our home, he would wriggle free and come running back to hold me. Doe Foster Child #1 finally had to be carried crying from our home. I watched from the window in my house as my adult son helped carry Doe Foster Child #1 out. While doing so, my son kept assuring Doe Foster Child #1 that it would be ok, that he would like his new family, and that we would always love him.

11. Very recently, the social worker with the CUA in charge of Doe Foster Child #1 contacted me and let me know that an emergency situation had arisen with the foster family Doe Foster Child #1 was placed with, and all the children in that home were being immediately removed. He did not give me details, but he asked if I would be willing to take Doe Foster Child #1 back. My immediate response was, "bring my son home." The social worker said he needed to check with DHS and would get back to me.

12. The social worker then followed up the same day and informed me that DHS denied the request to place Doe Foster Child #1 with me because I work with Catholic Social Services. DHS apparently told the social worker that "Catholic Social Services is going through a case right now and DHS is not approving him to come back here." I was devastated when I heard this news. The social worker seemed upset as well. The social worker said that the only option they had for Doe Foster Child #1 was a temporary respite home, but he would be moved from that home after a few days while they searched for another home.

13. I repeatedly expressed my desire to Doe Foster Child #1's social worker that he bring Doe Foster Child #1 back to my home. I also communicated this to my social workers at Catholic Social Services. I also spoke with my adult son, who told me he was prepared to co-sign on Doe Foster Child #1's adoption if we could get him back. I communicated the fact that I was immediately prepared to adopt Doe Foster Child #1 to my social workers and Doe Foster Child #1's social worker, but the social workers still did not bring Doe Foster Child #1 back home. My grandson frequently asks when Doe Foster Child #1 will come back home.

14. Recently, the social worker informed me that Doe Foster Child #1 was having difficulty associated with normal bodily functions. The social worker asked if I had any advice to help Doe Foster Child #1. It sounded to me as though Doe Foster Child #1 was regressing, and that some of these problems were related to Doe Foster Child #1's earlier issues with eating properly. I gave the social worker detailed instructions about how to prepare Doe Foster Child #1's food, what he liked to eat,

and how to help him with other bodily functions. But I also expressed again that the best thing for Doe Foster Child #1 would be to come back to our family. When Doe Foster Child #1 lived in our home, he was thriving and he felt safe and loved.

15. I have learned that Doe Foster Child #1 has not been receiving his regular and needed therapy for his autism, because Doe Foster Child #1's school called me to ask why Doe Foster Child #1 had not been attending his special classes and receiving therapy. The school wondered if Doe Foster Child #1 was sick since he had not been attending. I am worried about his physical and emotional wellbeing right now. I also understand that Doe Foster Child #1 has since been moved to another temporary respite home, and that there is no other permanent home available for Doe Foster Child #1 right now. My understanding is that under normal circumstances, Doe Foster Child #1 would have been placed with me so that I could give him the love and care he needs, and we could proceed with the adoption process. DHS has not provided me with any reason—other than its dispute with Catholic Social Services—for refusing to let me care for Doe Foster Child #1, I say prayers for his return throughout the day and look at Doe Foster Child #1's pictures every night. I frequently call his social worker to see if I can do anything to get Doe Foster Child #1 back. I cannot understand why Doe Foster Child #1 is being kept from me.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2018.

Doe Foster Mother #1

Doe Foster Mother #1

EXHIBIT 11

CITY OF PHILADELPHIA

COMMISSION ON HUMAN RELATIONS
601 Walnut Street, Suite 300 South
Philadelphia, PA 19106
Telephone (215) 686-4670
Fax (215) 686-4684

THOMAS H. EARLE, ESQUIRE
Chairperson

RUE LANDAU, ESQUIRE
Executive Director

May 7, 2018

Mark Rienzi
President
The Becket Fund for Religious Liberty
1200 New Hampshire Ave., NW, Suite 700
Washington, D.C. 20036
Via First Class Mail and Email

Dear Mr. Rienzi:

Thank you for your letter of April 18, 2018. The Department of Human Services ("DHS') will respond separately through the Law Department to the issues you raised concerning the contract between Catholic Social Services ("CSS") and DHS. We are writing to address your statements regarding the jurisdiction of Philadelphia Commission on Human Relations ("PCHR").

The purpose of the Philadelphia Fair Practices Ordinance ("FPO") is to assure that all persons are afforded equal opportunities for employment, housing, and the use of public accommodations such as CSS. Philadelphia Code §9-1101(1)(a) and (e). PCHR initiated this investigation at the request of the Mayor and pursuant to its authority under the Home Rule Charter, the Fair Practices Ordinance, and its governing regulations in order to determine if CSS is engaged in discriminatory practices. *See* PCHR Regulation No. 2.1. Pennsylvania Courts have deferred to agencies like PCHR in determining the extent of their jurisdiction and permitted the due course of administrative actions. *See Chestnut Hill College*, 158 A.3d 251, 257-58 (Pa. Cmwlth. 2017), *alloc. den.*, 173 A.3d 262 (Pa. 2017).

CSS' provision of services to children in foster care and to their foster parents under that contract is a public accommodation under § 9-1102(w) of the FPO, and therefore within the jurisdiction of the PCHR. Your citation to *Roman Catholic Archdiocese of Philadelphia v. Pa. Human Rel. Comm'n.*, 548 A.2d 328 (Pa. Cmwlth. 1988) and assertion that CSS is "distinctly private" do not alter this conclusion.

First, unlike the PHRA, the FPO does not contain an exception for "distinctly private" entities.

Second, your April 18 letter, as well as CSS's own website, demonstrate that that the provision of services to children in foster care and to their foster parents is a public accommodation. Your letter states that CSS "serves and places children regardless of their race, color, sex, sexual orientation, gender identity, religion, national origin…" pursuant to its contract with the City. The very nature of this process requires CSS to identify, recruit, certify, select, and

provide training, payment and services to the individuals and families who foster these children. *See* Professional Services Contract General Provisions Article V. Indeed, the CSS Philadelphia website invites members of the public to contact CSS to become potential foster parents. *See* https://cssphiladelphia.org/adoption/.

Third, the Commonwealth Court's recent opinion in *Chestnut Hill College* makes plain that a discrimination claim alleged against a Catholic-affiliated entity does not involve a matter of purely ecclesiastical concern, and therefore, religiously affiliated institutions like Chestnut Hill College (and also CSS) fall within the jurisdiction of the investigating agency. 158 A.3d 251, 259-60 (Pa. Cmwlth. 2017)*; see also*, *O'Connor v. Archdiocese of Philadelphia*, 975 A.2d 1084, 1106-09 (Pa. 2009) (finding Archdiocese was not exempt from parents' claims that their child had been unfairly disciplined by the school).

As we explained in our March 16, 2018 correspondence, any potential violation of the FPO falls under the jurisdiction of PCHR. Therefore, we reiterate the request for information set forth in that letter and ask that you respond within ten days of this letter to avoid the issuance of a subpoena.

Sincerely,

Rue Landau, Esquire
Executive Director

Thomas H. Earle, Esquire
Chairperson

cc: Marcel S. Pratt, City Solicitor
Cynthia Figueroa, DHS Commissioner

EXHIBIT 12

CITY OF PHILADELPHIA

LAW DEPARTMENT
One Parkway
1515 Arch Street
Philadelphia, PA 19102-1595

May 7, 2018

Mark Rienzi
President
The Becket Fund for Religious Liberty
1200 New Hampshire Ave. NW, Suite 700
Washington, DC 20036

Dear Mr. Rienzi:

The City of Philadelphia (the "City") is in receipt of your letter dated April 18, 2018 to the Philadelphia Commission on Human Relations (the "Commission"). Mr. Earle or Ms. Landau will respond directly to you regarding the questions you raise concerning the Commission's jurisdiction. We are writing to you separately to respond to the concerns you raise regarding the City's decision to suspend new referrals from DHS to Catholic Social Services' ("CSS") family foster care program.

While we are genuinely appreciative of the invaluable services that CSS provides on the City's behalf to the City's most vulnerable children and to the resource families that care for those children, those services must be provided in a manner consistent with certain core City principles, including our non-discrimination rules. As CSS works on the City's behalf, we cannot allow discrimination against qualified couples who are ready to take on this important role, simply because of whom they choose to marry. We would not allow such discrimination against, for example, Catholic couples or "mixed-race" couples, and we cannot allow it with respect to same-sex couples, either.

You take issue in your letter with the City's ability to apply these non-discrimination rules in the context of CSS's current contract with the City. We disagree.

Nothing in CSS's existing contract obligates the City to continue to send any referrals to CSS. A review of CSS's contract For General, Kinship, and Teen Parent/Baby Resource Home Care Providers shows numerous duties on the part of CSS, but for DHS, its duty primarily is to provide CSS with support and compensation for the services that CSS performs, with no minimum guarantee or even a duty to provide *any* referrals. Without any duty to make referrals, DHS simply cannot be in breach of its contract for failure to continue making referrals.

Moreover, the City has the unilateral right under the contract to terminate or suspend the contract, regardless of any breach or lack thereof by CSS, "for any reason, including, without limitation, the convenience of the City." Professional Services Contract General Provisions ("General Provisions") ¶ 14.2. You correctly note in your letter that the City has not sent to CSS a notice of default or a notice to suspend or terminate. That is intentional, as we do not wish to make this an adversarial proceeding, and we remain hopeful that CSS will comply with its contractual obligations and will implement them in a non-discriminatory manner. Regardless, however, the City reserves the right to cancel or suspend this contract, at any time, for the City's convenience.

Of course, the City does not need to rely on its mere convenience. Section 3.21 of the General Provisions states:

> Provider shall not reject a child or family for Services based upon the location or condition of the family's residence, their environmental or social condition, *or for any other reason* if the profiles of such child or family are consistent with Provider's Scope of Services or DHS's applicable standards as listed in the Provider Agreement, unless an exception is granted by the Commissioner or the Commissioner's designee, in his/her sole discretion.

("Services" are defined at General Provisions ¶ 1.72 as "the work to be performed under this contract," which plainly includes the intake and registration of new, prospective foster parents. *See, e.g.*, Scope of Service p.4 ("Resource caregivers are screened, trained, and certified by the Provider."); *id.* at 6 ("Provider is responsible for offering training and related support to Resource Parents")). In your letter, you confirm that CSS has no intention of complying with this contractual obligation to provide Services to *all* qualified families, as you have clearly re-affirmed that CSS intends to reject families for Services based solely on the fact that they are same-sex couples. That is not a permissible reason for rejection under either the Scope of Services set forth in the contract or under DHS's applicable standards, and the Commissioner has no intention of granting an exception.

Indeed, as you know, the refusal to provide Services to same-sex couples constitutes a violation of a fundamental City policy to provide services to *all* qualified families. We cannot allow a provider, acting under a City contract, to inform a qualified family who wants to give of its time, resources, and home, in order to protect vulnerable children, that they must go elsewhere to make this contribution, solely because our contractual provider disapproves of their familial relationship. The City maintains an important policy that all resource families be treated equally, so long as they meet the agreed-upon eligibility requirements. We recognize that CSS's values and the City's values may diverge here, but CSS is contracting with the City, not free-lancing, and the ultimate responsibility for managing this foster care program belongs to the City. We have to insist that all services provided as part of this program are provided in a manner that is consistent with our conception of equality.

Moreover, and independent of the foregoing, CSS's refusal to provide services to same-sex couples is a violation of law. CSS falls squarely within the definition of a "public accommodation" under the City's Fair Practices Ordinance, Phila. Code § 9-1102(1)(w), as CSS is, *inter alia*, a "provider . . . whose . . . services . . . are . . . made available to the public." You focus on CSS's admirable provision of services to *the children*, but the contract indisputably also requires CSS to provides services *to the foster families*, including certification, support, re-evaluation, and training to *any* family that meets state regulations and DHS standards and wishes to provide badly needed foster care.

Please be assured that we have not targeted your client on the basis of its religious beliefs. As we explained, our motivation arises from our concern that all families in this City be treated equally with respect to all opportunities and services that are available to them. We respect your sincere religious beliefs, but your freedom to express them is not at issue here where you have chosen voluntarily to partner with us in providing government-funded, secular social services. The Commonwealth has set eligibility standards for prospective foster parents. It is inappropriate (and arguably unconstitutional) for us to allow a provider to add its own requirements for foster parents that are rooted in religious doctrine, and which clash with the constitutional requirement that we treat all marriages/families equally. Nor can we allow you to refuse service to an otherwise eligible family by referring them to another agency.

Please also note that CSS's current contract expires on June 30, 2018, and the City is under no legal obligation to enter into a new contract for any period thereafter. We are hopeful that we can work out any differences before then, but please be advised that -- except where the best interests of a child demands otherwise -- the City does not plan to agree to any further referrals to CSS, and the City intends to assist with the transition of foster families to other agencies, absent assurances that CSS is prepared to adhere to its contractual obligations and, in implementing its City contract, to comply with all applicable laws, including those relating to non-discrimination. We believe our current contract with CSS is quite clear that this is our right, but please be advised that any further contracts with CSS will be explicit in this regard.

Family equality is both a legal requirement, and an important City policy and value that must be embodied in our contractual relationships. If CSS cannot come into compliance, we are prepared to enter into an interim, contractual relationship with CSS in order for CSS to continue to supervise the foster children in its care properly with the least amount of disruption for them, while the transition to other agencies is completed. On a related note, contrary to the discussion in your letter regarding DHS's practice concerning siblings, because the best interests of the children in our care are paramount, we did recently grant an exception to the cessation of CSS referrals in that instance to ensure that siblings were placed together, and we expect that the best interests of the children will remain paramount throughout any transition.

In closing, we do not wish to see our valuable relationship with CSS regarding foster care services come to an end. We are hopeful that CSS will be prepared to commit to comply with the letter and spirit of CSS's contractual obligations and the Fair Practices Ordinance by

committing to provide foster care services on a non-discriminatory basis to all families that meet the City's standards. Please let me know as soon as possible whether CSS is prepared to comply with these standards. Alternatively, please let me know with whom I should be in contact for purposes of promptly negotiating a transition plan.

Thank you for your understanding and your client's work with children and families.

Sincerely,

Valerie M. Robinson

Valerie Robinson
Chair, Corporate and Tax Group

cc: Rue Landau, Executive Director Philadelphia Commission on Human Relations

Cynthia Figueroa, Commissioner, Department of Human Services

Marcel S. Pratt, City Solicitor

EXHIBIT 13

□ Birth, marriage & life events

Adopt a child

Become a foster parent

Ask the DHS Commissioner's Action Response Office (CARO)

Get a birth certificate

Get a copy of a divorce decree

Get a death certificate

Get a marriage license

Request Medical Examiner records

Become a foster parent

Every child deserves to be loved, and to grow up in a safe and healthy environment. Foster care is temporary care for children who are unable to remain in their own homes. Most children enter foster care as a result of abuse or neglect.

Over 5,000 children and youth are in foster care at any given time in this city. People who care for children in foster care are called resource parents because they help parent a child, and act as a resource and mentor to that child's family. Resource parents provide children with love and support while they are separated from their families.

Overview

The goal of foster care is to reunite children with their families. When this is not possible, as determined by the courts, many resource parents choose to adopt the children that are in their care.

Resource parents as part of the team

Resource parents play a central role in helping children in foster care reunify with their family of origin.

Resource parents are key members of the child's permanency planning team. This team can consist of the child's social worker, birth family, and other caring adults. As the person who lives with the youth 24 hours a day, seven days a week, resource parents bring important perspectives and information to the team meetings.

Successful resource parents:

- Work with all members of the team.
- Share information .
- Give and receive support.
- Ensure that the child feels safe and is free from threats of harm or danger.

Resource parents can help in the reunification process in many ways. They should:

- Be a role model and mentor for the parents of origin.
- Support the child's relationship with their parents.
- Share information with the parents, such as health care and educational progress.
- Provide emotional support for the child as they prepare to return home.
- Be available to both the child and their parents after they return home.
- Include parents and other family members in important holidays, birthdays, or other special occasions (such as school plays).

Financial assistance

Resource parents receive money for the cost of caring for a child. The amount changes depending on the level of care the child needs. All children receive medical coverage through Medicaid.

Who

Foster parents can be single, married, divorced, any gender or sexual orientation.

Requirements

To care for children in foster care, you must:

- Pass child abuse, criminal history, and FBI clearances.
- Be physically able to care for a child.
- Have space in your home for an additional child.
- Be at least 21 years of age.

How

Here's how to become a resource parent

1 Choose a foster care agency.

DHS works with many state-licensed agencies to provide foster

care. Browse the **list of foster agencies** to find the best fit for you. You want to feel confident and comfortable with the agency you choose. This agency will be a big support to you during your resource parent journey. Once you've found one that you like, call them to find out how to begin the certification process. Each agency has slightly different requirements, specialties, and training programs.

2

Begin the certification process.

The certification process will take approximately 3-6 months to complete.

As part of the process you will have to:

- Fill out an application.
- Attend an orientation .
- Complete at least 6 hours of training.
- Get a medical examination that proves you are physically able to care for children and are free from contagious diseases.
- Pass child abuse, criminal history, and FBI clearances.
- Have a social worker come to your home to help determine if it is safe for a child.

Relatives, family friends, trusted teachers, coaches, or others who have a close connection with the foster child may become kinship caregivers. Kinship caregivers are allowed to have foster children placed more quickly into their homes. This is often better for the child, as it limits disruption and prevents the need for placement in a foster care center.

Kinship caregivers go through an initial review that includes clearances of their home. Once they have been cleared, the foster children connected to them can come live with them. Kinship caregivers still need to go through the rest of the process of becoming a foster parent, but they can do this while they serve as foster guardians.

To get more information about becoming a resource parent, call (215) 683-5709 or email **dhs.fosteringphilly@phila.gov**.

EXHIBIT 14

DocuSign Envelope ID: 421E34E1-1108-43FD-9478-27B82F8F845C

Contract Number **16-20030-04**
Original Contract Number **16-20030**
290 – Placement Services

City of Philadelphia
Department of Human Services

CONFORMED

STANDARD AMENDMENT AGREEMENT

THIS STANDARD AMENDMENT AGREEMENT ("Amendment Agreement") is made as of September 20, 2017and effective July 1, 2017 (the "Effective Date") by and between the City of Philadelphia ("the City"), by and through its **DEPARTMENT OF HUMAN SERVICES** ("Department"), and **CATHOLIC SOCIAL SERVICES** ("Provider"), a nonprofit corporation, with its principal place of business at **222 NORTH 17TH STREET, PHILADELPHIA, PENNSYLVANIA 19103.**

BACKGROUND

The City and Provider entered into a certain Contract, Contract Number **16-20030**, dated **November 30, 2015**, which includes the City of Philadelphia Professional Services Contract General Provisions for the Department of Human Services (the "General Provisions"), the Provider Agreement, Cross Agency Response for Effective Services ("CARES") Limited License Agreement (when applicable), and any and all attachments, exhibits and documents thereto (collectively, the "Base Contract"), wherein Provider agreed to render various Services to the City in accordance therewith; and

The City and Provider entered into an amendment to the Base Contract, Contract Number **16-20030-01**, for the period **July 1, 2015** to **June 30, 2016**; and

The City and Provider entered into an amendment to the Base Contract, Contract Number **16-20030-02**, for the period **July 1, 2015** to **June 30, 2016**; and

The City and Provider entered into an amendment to the Base Contract, Contract Number **16-20030-03**, for the period **July 1, 2016** to **June 30, 2017**; and

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Statement of Purpose:

This Scope of Service is made and entered into between Catholic Social Services (the Provider) and the Philadelphia Department of Human Services (DHS), and sets forth the services for general, kinship, and teen parent/baby resource home care.

Throughout this document, the term "Resource Parent" refers to both kinship parents and non-relative foster parents.

When a child or youth is placed through a Community Umbrella Agency, CUA, the Provider offers ongoing support and coaching to Resource Parents through Provider Staff[1]. The Provider is required to work collaboratively with the CUA. Contracts between DHS and all CUAs set forth services for resource home care with case management responsibilities remaining with the CUA. When the child or youth is receiving case management services directly from DHS, the Provider must also deliver case management services to the Resource Parent, parent or other reunification resource, and the child or youth and collaborate with the assigned DHS Social Worker (DHS cases).

Department Overview:

The mission of the Department of Human Services (DHS) is to provide and promote safety, permanency, and well being for children and youth at risk of abuse, neglect and delinquency. DHS is organized in the following Divisions: Administration and Management, Child Welfare Operations Division, Community Based Prevention Services, Finance, Juvenile Justice Services, and Performance Management and Technology. DHS continues to implement the Improving Outcomes for Children (IOC) model. The vision for IOC is to:

- Maintain children and youth safely in their own homes and community.
- Timely reunification or other permanency.
- Reduce use of congregate care.
- Improve children, youth, and family functioning.

As it relates to Resource Home care, the IOC framework provides a single Case Manager to work with assigned families. The case management service is provided by Community Umbrella Agencies who are embedded in the communities they serve.

For children and youth for whom the Provider continues to provide case management services, the case management staff interact on a regular basis with schools, medical, dental, and behavioral health providers; various community resources; and all service providers indicated on an Individual Service Plan (ISP) or Family Service Plan (FSP). For youth funded and placed by a CUA, the Provider interacts with external resources as needed, collaborates and communicates with the CUA, and continues to support the resource caregivers.

Provider Organizational Overview:

Mission Statement: Catholic Social Services of the Archdiocese of Philadelphia continues the work of Jesus by affirming, assisting and advocating for individuals, families, and communities.

Vision and Values Statement: Catholic Social Services Vision:

[1] Provider Staff is responsible for recruiting and certifying foster and kinship homes.

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Catholic Social Services exists to transform lives and bring about a just and compassionate society where every individual is valued, families are healthy and strong, and communities are united in their commitment to the good of all. We envision a world touched by God's mercy: where poverty and need are alleviated, and all people share justly in the blessings of creation.

Catholic Social Services Values:

Compassion: genuine care and heartfelt concern for those we serve
Dignity: respect for each person created in God's image, regardless of color, capacity, or age
Charity: generosity toward all people in response to God's goodness to us
Justice: defense of and advocacy for the rights of the poor, vulnerable, and disadvantaged
Excellence: professional competence and responsible stewardship of time and resources

Problems and Issues to be Addressed:

Ideally, children and youth should be with their own families. When this is not possible, resource homes ensure that children and youth can be maintained safely in their own community. All resource home procedures and resources must be directed to supporting reunification or other permanency options, and the overall positive functioning of children, youth, and their families. Resource Parents must function as mentors to legal families to support these goals. An increased focus on recruiting resource caregivers who can manage adolescents is required in order to reduce the use of congregate care. There must also be a continued focus on the need for resource homes for children who are 0-6 years of age. The specific issue to be addressed by the Provider is to recruit, screen, train, and provide certified resource care homes for dependent children or youth, some of whom will need support to address behavioral health, medical, and educational needs. Homes for teens including pregnant teens and teen parents (teen parent/baby placements) are a priority in order to reduce the use of congregate care.

Program Objectives:

The program objectives are to provide trauma informed and culturally competent placement resources via trained resource caregivers. Resource caregivers also serve as a mentor and support to the legal family. Anticipated outcomes for resource home care services are:

- To provide children with protection, care, and a nurturing environment with certified Resource Parents which can include extended family members while a permanent plan can be established within a set time frame.
- To focus on identifying strengths, developing protective capacities and building resiliency and adaptive coping skills.
- To facilitate participation in service delivery and/or treatment provided by external resources so that healthy partnerships can be created and goals on the service plans can be archived.
- To provide opportunities to strengthen and develop youth assets.
- To promote social competency skills.
- To ensure that youth is available for assigned court related appearances.
- To collaborate with the CUA case manager, DHS and/or other team members in planning the transition into the next level of care which will ideally be family reunification.
- To access medical, dental and behavioral health services as needed.
- To provide support, including access to resources, to achieve academic and vocational goals.

Program Overview:

Resource Home (Foster Care and Kinship Care): The primary goal of Resource Home Care is to support the safety, stability, permanency, and well-being needs of the child or youth and legal family. Resource

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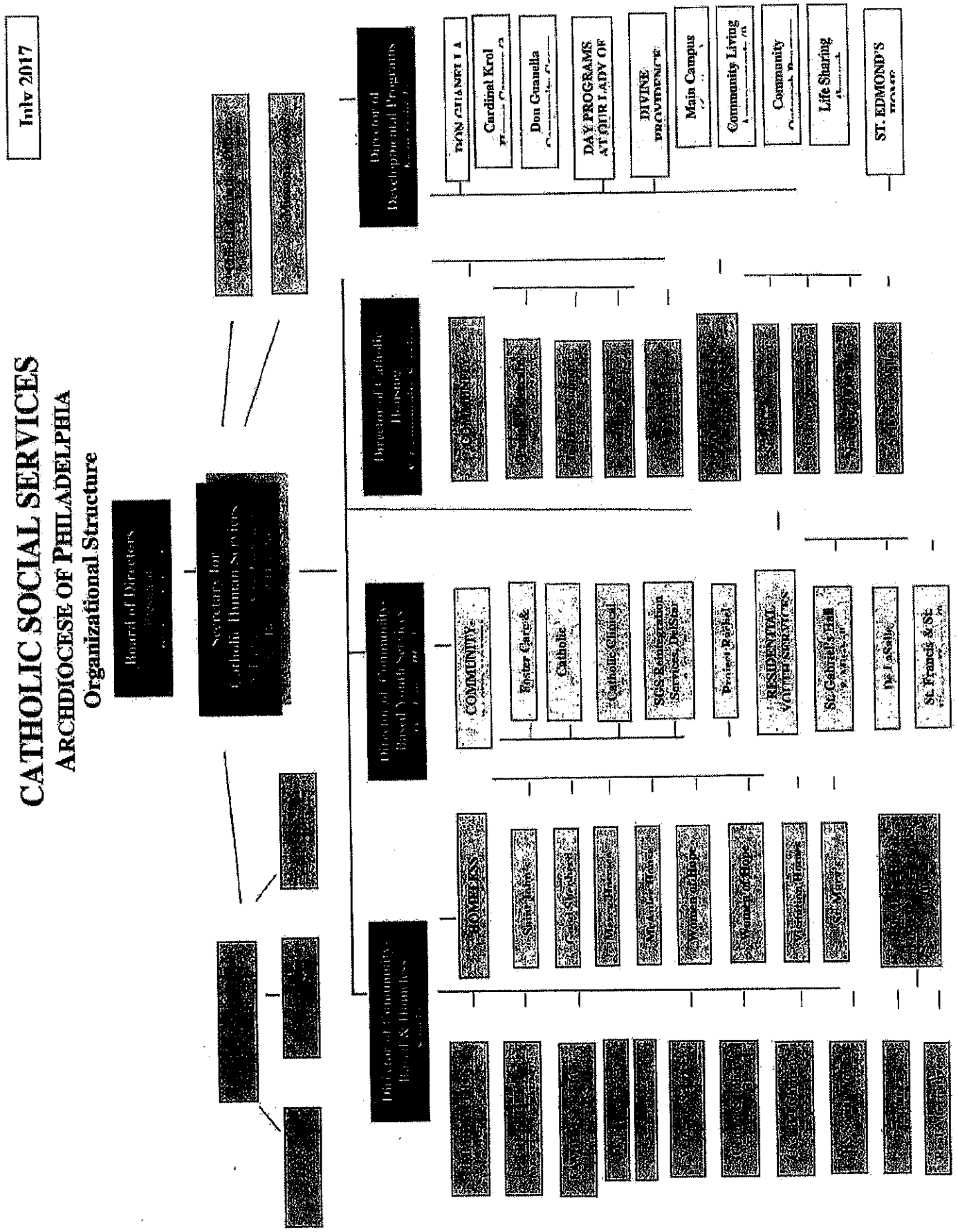

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THE CITY OF PHILADELPHIA

PROFESSIONAL SERVICES CONTRACT

GENERAL PROVISIONS

FOR

DEPARTMENT OF HUMAN SERVICES CONTRACTS

Revision Date: June 2017

DocuSign Envelope ID: 421E34E1-1109-43FD-9478-27B82F8F845C

1.84 **Total Actual Cost.** "Total Actual Cost" means the sum of all allowable expenses incurred by Provider in the provision of a particular Service under the Contract.

1.85 **Vacancy.** "Vacancy" means the existence of an available bed in a placement program, or an available service unit or slot in a non-placement program.

ARTICLE II: TERM

2.1 **Initial Term.** The initial term ("Initial Term") of this Contract is set forth in the Provider Agreement. In no event shall the Initial Term exceed one (1) year.

2.2 **Additional Terms.** The City may, at its sole option, amend this Contract to add on an annual basis up to three (3) successive one (1) year terms ("Additional Terms"), unless any shorter term (or terms) is specified in the Provider Agreement. Unless otherwise stated in the Provider Agreement, the same terms and conditions applicable in the Initial Term shall be applicable in the Additional Term(s). The City shall give Provider thirty (30) days written notice of its intent to amend this Contract to add an Additional Term prior to each annual Additional Term. Each Additional Term shall be subject to appropriation of funds by City Council for such Additional Term. There shall be no liability or penalty to the City for electing not to amend the term of this Contract to add Additional Terms. Each Additional Term of this Contract shall be deemed to constitute a separate contract, whose term shall not exceed one (1) year.

ARTICLE III: PROVIDER'S DUTIES AND COVENANTS

3.1 **Performance Requirements.** Provider shall provide all Services and Materials in accordance with this Contract and applicable professional standards. All payments to Provider are contingent upon satisfactory performance of the terms and conditions set forth in this Contract, as determined by the Commissioner in his or her sole discretion.

3.2 **Compliance with Applicable Law.** Provider shall comply with the requirements of all Applicable Law with respect to Provider's activities, Services, Materials and facilities used in connection with any aspect of this Contract, whether or not such Applicable Law is specifically identified by name in this Contract. Provider shall inform the Commissioner, in writing, of any notices of violations of any Applicable Law within forty-eight (48) hours of Provider's receipt thereof, and shall correct any violations within the time prescribed by law, or immediately in the case of any emergency. In the case of out-of-state placements, the regulations of the licensing state and municipality, if any, shall apply except when such regulations are in conflict with PA DHS or City policies governing the

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3.17 **Service Requirements.**

(a) Provider shall provide Services to the children and youth and their families in accordance with the FSP, any Placement Amendments, and Form Authorizations.

(b) Provider shall submit a Scope of Services which shall be consistent with Department's Program Standards and Applicable Law.

(c) Provider's Scope of Services shall be current, shall satisfy the City's requirements as to form and content, and shall be attached as an exhibit to the Provider Agreement.

3.18 **Web-Based Central Referral Unit (CRU) System Participation.**

(a) The Department utilizes a Web-Based CRU System for all its non-PBC providers. Upon its implementation, Provider shall report all its vacancies, by age and gender, by participating in the Department's Web-Based CRU System, and in any additional tracking system the Department may identify, and Provider shall update the system on a weekly basis, and/or more frequently for emergency shelter programs. Failure to comply with this provision may result in the Provider not receiving referrals from the Department's CRU. Provider has twenty-four (24) hours to accept or reject a referral.

(b) The Department shall monitor Provider's compliance with this provision and shall only make referrals based upon vacancies reported through this system. The Department, in its sole discretion, may periodically utilize additional resource tracking systems.

3.19 **Dependent Placement Referrals.** Provider shall accept youth with deferred or dual adjudications in its dependent facility. To the extent permitted by law, including applicable state regulations, Provider shall accept dependent youth in its delinquent facilities if such youth are otherwise eligible for admission into Provider's facility. Delinquent Providers agree that their Scope of Services shall not exclude dependent children from their program unless they are required by law to do so.

3.20 **Referral Disputes.** Provider shall submit a written quarterly report to the Commissioner's designee detailing the number and circumstances of each referral dispute registered in accordance with Section 5.2(b)(3) of these General Provisions. Excessive referral disputes, as determined by the Commissioner in his/her sole discretion, may cause the City to terminate this Contract.

3.21 **Rejection of Referral.** Provider shall not reject a child or family for Services based upon the location or condition of the family's residence, their environmental or social condition, or for any other reason if the profiles of such child or family are consistent with Provider's Scope of Services or DHS's applicable standards as listed in the Provider Agreement, unless an exception is

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granted by the Commissioner or the Commissioner's designee, in his/her sole discretion.

3.22 **Notice of Referral Acceptance or Rejection.**

(a) Except for Performance Based Contract Providers, Provider shall notify the Commissioner within twenty-four (24) hours of its decision to accept or reject placement referrals; provided, however, Provider's rejection of a placement referral must be in accordance with the process set forth in Section 5.2(b)(3) of the General Provisions. Provider shall provide the Commissioner with a written statement of the basis for each rejected referral within twenty-four (24) hours of the rejection unless an exception is granted by Commissioner or Commissioner's designee.

(b) Within seventy-two (72) hours of accepting a case that has been designated as a Kinship Care placement, Provider must visit the placement and complete an assessment of the kinship caregiver's home to ensure that it is in compliance with State regulations regarding foster homes

3.23 **Documentation of Referrals.** Providers must maintain centrally located documentation regarding each referral that the Provider receives from DHS. Provider must maintain the following information: the date of receipt of referral; the requesting DHS division (CWO or JJS); the name, age and race of the child; presenting primary problem; and whether the child was accepted or rejected for admission to the program and if applicable, the reason for rejection.

3.24 **Vacation, Holiday Placement.** Provider shall ensure that each child in an Out-of-Home Placement has uninterrupted Services and placement in the event Provider's office closes for vacation or holidays.

3.25 **Adequate Clothing.** It shall be Provider's responsibility to purchase a seasonally adequate and complete wardrobe for each child in placement in its program and for any child who is being discharged from its program.

3.26 **Return of Medical Assistance Card.** At the time of discharge or within seventy-two (72) hours of an unplanned discharge, Provider shall return the Medical Assistance card of any child who has been removed or discharged from Provider's placement to the City; otherwise, Provider shall be liable for any charges incurred after discharge. Provider agrees that, upon its return of the child's Medical Assistance card to the City, Provider will cooperate fully with the Department for the purpose of re-enrolling the child with a primary care physician.

3.27 **Service Reports.**

(a) **Progress Reports.** Provider shall submit to the City, on a quarterly basis, a written progress report for each child for whom Services are provided. The report shall be consistent with the ISP, shall present an evaluation of

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8.3 **Personal Services.** Provider acknowledges that the Services and Materials are the personal services of Provider and the City shall have no obligation to accept performance by a third party without the Commissioner's or designee's prior and express written consent.

ARTICLE IX: INDEPENDENT CONTRACTOR; INDEMNIFICATION; LITIGATION COOPERATION

9.1 **Independent Contractor.** Provider is an independent contractor and shall not in any way or for any purpose be deemed or intended to be an employee or agent of the City. Neither Provider nor its agents, employees or Subcontractors shall in any way represent that they are acting as employees, officials or agents of the City.

9.2 **Indemnification.** Provider shall indemnify, defend and hold harmless the City, its officers, employees and agents, from and against any and all losses, costs (including, but not limited to, litigation and settlement costs and counsel fees and expenses), claims, suits, actions, damages, liability and expenses, occasioned wholly or in part by Provider's act or omission or negligence or fault or the act or omission or negligence or fault of Provider's agents, Subcontractors, independent contractors, suppliers, employees or servants in connection with this Contract, including, but not limited to, those in connection with loss of life, bodily injury, personal injury, damage to property, contamination or adverse effects on the environment, intentional acts, failure to pay any Subcontractors and suppliers, any breach of this Contract, loss of data, data security breach, and any infringement or violation of any proprietary right (including, but not limited to, patent, copyright, trademark, service mark and trade secret).

9.3 **Litigation Cooperation.** If, at any time, the City becomes involved in a dispute or receives notice of a claim or is involved in litigation concerning the Services and Materials provided under this Contract, the resolution of which requires the Services or cooperation of Provider, and Provider is not otherwise obligated to indemnify and defend the City pursuant to the provisions of Section 9.2 (Indemnification) above, Provider agrees to provide such Services and to cooperate with the City in resolving such claim or litigation as Additional Services and Materials under Section 3.3 (Additional Services and Materials; Change in Scope of Services) above and require any Subcontractors to abide to this Section 9.3.

9.4 **Notice of Claims.** If Provider receives notice of a legal claim against it in connection with this Contract, Provider shall submit appropriate written notice of such claim to its insurance carrier within the time frame required for submission of claims by the applicable insurance policy and, within ten (10) business days of receipt of notice of the claim, to the Commissioner.

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14.5 **Special Suspension Rules.** Suspension of Provider's performance under this Contract after an Event of Default shall not constitute a waiver or release of any liability of Provider for such Event of Default or any of the City's damages or other remedies arising out of such Event of Default; nor shall such suspension be deemed an election of remedies in derogation of any other remedy. Provider acknowledges that the City shall have the right, at its sole discretion, to suspend Provider's performance in the event City Council or the Commonwealth of Pennsylvania does not appropriate funds for the performance of this Contract. In the event that the City issues a Suspension Notice to Provider, such suspension shall continue from the effective date specified in the Suspension Notice until a date specified in the Suspension Notice which shall be not more than one hundred eighty (180) days after the effective date or the date of judgment in any pending trial, whichever is later (such period, the "Suspension Period"). On or prior to the expiration of the Suspension Period, the City shall either terminate this Contract by giving a Termination Notice pursuant to Section 14.2 (Termination or Suspension) above, or by notice to Provider, instruct Provider to resume the delivery of Services and Materials pursuant to this Contract upon the expiration of the Suspension Period. After issuing a Suspension Notice, the City shall pay any invoices submitted by Provider for Services rendered prior to the commencement of the Suspension Period or otherwise payable by the City to Provider under this Contract, subject to all of the City's rights and remedies against Provider, including but not limited to, its rights of set off and its right to review and accept Services and Materials prior to payment therefor.

ARTICLE XV: ADDITONAL REPRESENTATIONS AND COVENANTS OF PROVIDER RELATING TO CERTAIN APPLICABLE LAWS

In addition to the representations, warranties and covenants made by Provider in Article IV, Provider further represents, warrants and covenants that, to the extent of their applicability to Provider, Provider is in compliance with the laws, ordinances, regulations and executive orders described below. By executing this Contract, Provider thereby certifies to such compliance. Provider further certifies that the representations, warranties, and covenants provided pursuant to this Article shall continue to remain true throughout the Term of this Contract or any other period of time required by such laws. In the event said representations, warranties, and covenants are or become untrue or inaccurate, Provider shall promptly give notice thereof to the City, specifying the manner in which said representation, warranty, or covenant is untrue or inaccurate. The provisions of this Article are not intended to limit the applicability of the other provisions of this Contract, including, without limitation, Provider's agreement to comply with all Applicable Law.

15.1 **Non-Discrimination; Fair Practices.** This Contract is entered into under the terms of the Charter, the Fair Practices Ordinance (Chapter 9-1100 of the Code) and the Mayor's Executive Order No. 04-86 (the "Executive Order"), as they may be amended from time to time, and in performing this Contract, Provider shall not discriminate or permit discrimination against any individual because of race, color, religion or national origin. Nor shall Provider discriminate or permit

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discrimination against individuals in employment, housing and real property practices, and/or public accommodation practices whether by direct or indirect practice of exclusion, distinction, restriction, segregation, limitation, refusal, denial, differentiation or preference in the treatment of a person on the basis of actual or perceived race, ethnicity, color, sex, sexual orientation, gender identity, religion, national origin, ancestry, age, disability, marital status, source of income, familiar status, genetic information or domestic or sexual violence victim status, Human Immunodeficiency Virus (HIV) infection, or engage in any other act or practice made unlawful under the Charter, Chapter 9-1100, the Executive Order, or under the nondiscrimination laws of the United States or the Commonwealth of Pennsylvania. In the event of any breach of this Section 15.1 (Non-Discrimination; Fair Practices), the City may, in addition to any other rights or remedies available under this Contract, at law or in equity, suspend or terminate this Contract forthwith.

15.2 **Chapter 17-400 of the Philadelphia Code: Exclusionary Private Organizations.**

(a) In accordance with Chapter 17-400 of the Code, Provider agrees that its payment or reimbursement of membership fees or other expenses associated with participation by its employees in an exclusionary private organization, insofar as such participation confers an employment advantage or constitutes or results in discrimination with regard to hiring, tenure of employment, promotions, terms, privileges or conditions of employment on the basis of race, color, sex, sexual orientation, religion, national origin or ancestry, constitutes, without limiting the applicability of Articles XII (Events of Default) and XII (Remedies) above, a substantial breach of this Contract entitling the City to all rights and remedies provided in this Contract or otherwise available at law or in equity.

(b) Provider agrees to cooperate with the Commission on Human Relations of the City in any manner which the Commission deems reasonable and necessary for the Commission to carry out its responsibilities under Chapter 17-400 of the Code. Provider's failure to so cooperate shall constitute, without limiting the applicability of Articles XI (Events of Default) and XII (Remedies) above, a substantial breach of this Contract entitling the City to all rights and remedies provided in this Contract or otherwise available at law or in equity.

15.3 **Executive Order 03-12: Minority, Woman and Disabled Business Enterprise Participation.** In accordance with Executive Order 03-12 (the "Antidiscrimination Policy"), the City, acting through its Office of Economic Opportunity ("OEO"), has established an antidiscrimination policy that relates to the solicitation and inclusion of Minority Business Enterprises ("MBE"), Woman Business Enterprises ("WBE"), and Disabled Business Enterprises ("DSBE")

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Catholic Social Services
ARCHDIOCESE OF PHILADELPHIA

Catholic Social Services of the Archdiocese of Philadelphia continues the work of Jesus by affirming, assisting, and advocating for individuals, families and communities.

PROVIDING HELP • CREATING HOPE

June 27, 2017

The Board of Catholic Social Services has granted approval for the following individuals to sign contracts.

James Amato	Secretary for Catholic Human Services	jamato@chs-adphila.org
Franz Fruehwald	Chief Financial Officer	ffruehwald@chs-adphila.org

Sincerely,

Gary Miller
Controller

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CONTRACT SUMMARY AND ENDORSEMENT DATE: 9/19/2017

TO THE LAW DEPARTMENT: The attached bid and award described below is referred to you for certification as to form, and where annual surety bond is on file, to have Contractor post satisfactory bond.

CONTRACTOR	FINANCE CONTR. NO.	LAW DEPT. NO.
Catholic Social Services	16 20030	16 20030 04
	AMT. OF CONTRACT: $43,178,007.23	ANN. SURETY BOND
DESCRIPTION: Placement Services	PERIOD COVERED: 7/1/2015 - 6/30/2018	

ENDORSEMENT

OFFICE OF THE DIRECTOR OF FINANCE-ACCOUNTING DIVISION	OFFICE OF THE CITY CONTROLLER
Examined: Pat Preston PP 9-1-17	Examined:
(For the Director of Finance) (Date)	(For the City Controller) (Date)

This contract approved as to availability of funds under the budget and appropriations pursuant to section 8-200 (2) (d) of the Home Rule Charter.

Abdul P Hale 09-19-17

(For the Director of Finance) (Date) (For the City Controller) (Date)

DOCUMENT NO.	ACCOUNT CODE					DEPARTMENT OR AGENCY	AMOUNT CHARGEABLE TO ACCOUNT
	FUND	DEPT.	ELEMENT	SUB ELEMENT	CLASS		
						Previously Encumbered	$23,022,293.80 ✓
MDXX18000210 01	080	22	49	01	0290	HUMAN SERVICES	$4,534,945.29
MDXX18000210 02	080	22	49	01	0290	HUMAN SERVICES	$133,513.41
MDXX18000210 03	080	22	49	01	0290	HUMAN SERVICES	$3,300,925.60
MDXX18000210 04	010	22	49	01	0290	HUMAN SERVICES	$1,051,791.92
MDXX18000298 01	080	22	47	01	0290	HUMAN SERVICES	$2,120,584.00
MDXX18000298 02	080	22	47	01	0290	HUMAN SERVICES	$105,936.00
MDXX18000298 03	080	22	47	01	0290	HUMAN SERVICES	$5,243,578.00
MDXX18000298 04	010	22	47	01	0290	HUMAN SERVICES	$2,939,717.00
						TOTAL	$42,453,285.02

Partial Certification
Contract increased to $43,178,007.23.
Contract extended to 6/30/2018.

Amendment

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71-361

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CONTRACT SUMMARY AND ENDORSEMENT DATE 9/18/2017

TO THE LAW DEPARTMENT: The attached bid and award described below is referred to you for certification as to form, and where annual surety bond is on file, to have Contractor post satisfactory bond.

CONTRACTOR Catholic Social Services	FINANCE CONTR. NO. 16 20030	LAW DEPT. NO. 16 20030 04
	AMT. OF CONTRACT $43,178,007.23	ANN. SURETY BOND
DESCRIPTION Placement Services	PERIOD COVERED 7/1/2015 - 6/30/2018	

ENDORSEMENT

OFFICE OF THE DIRECTOR OF FINANCE-ACCOUNTING DIVISION Examined: Pat Preston PP 09/15/17 (For the Director of Finance) (Date)	OFFICE OF THE CITY CONTROLLER Examined: (For the City Controller) (Date)

This contract approved as to availability of funds under the budget and appropriations pursuant to section 8-200 (2) (d) of the Home Rule Charter:

Alfred P Halm 09-19-17
(For the Director of Finance) (Date) (For the City Controller) (Date)

DOCUMENT NO.	ACCOUNT CODE FUND	DEPT	ELEMENT	SUB ELEMENT	CLASS	DEPARTMENT OR AGENCY	AMOUNT CHARGEABLE TO ACCOUNT
						Previously Encumbered	$23,365,446.24 ✓
MDXX16000054 01	080	22	47	01	0290	HUMAN SERVICES	($83,716.94) JE
MDXX16000054 02	080	22	47	01	0290	HUMAN SERVICES	($26,672.20) JE
MDXX16000054 03	080	22	47	01	0290	HUMAN SERVICES	($208,735.91) JE
MDXX16000054 04	010	22	47	01	0290	HUMAN SERVICES	$10,633.65 JE
MDXX16000143 01	080	22	49	01	0290	HUMAN SERVICES	($36,811.93) JE
MDXX16000143 02	080	22	49	01	0290	HUMAN SERVICES	($1,083.75) JE
MDXX16000143 03	080	22	49	01	0290	HUMAN SERVICES	($36,739.31) JE
MDXX16000143 04	010	22	49	01	0290	HUMAN SERVICES	$39,973.95 JE
						TOTAL	$23,022,293.80

Partial Certification.
Contract increased to $43,178,007.23.
Contract extended to 6/30/2018.

Page 1 of 1

71-361

DocuSign SECURED

Certificate Of Completion

Envelope Id: 421E34E1110943FD947827B82F8F845C
Subject: Contract #16-20030-04 Catholic Social Services 290 SAA (Corp)
Source Envelope:
Document Pages: 118
Supplemental Document Pages: 0
Certificate Pages: 4
AutoNav: Enabled
EnvelopeId Stamping: Enabled
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Signatures: 4
Initials: 0

Payments: 0

Status: Completed

Envelope Originator:
City of Philadelphia - Department of Human Services

City Hall, Room 215
Philadelphia, PA 19107
dhs.contractinitiation@phila.gov
IP Address: 170.115.248.25

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Status: Original
8/15/2017 12:03:55 PM

Holder: City of Philadelphia - Department of Human Service
dhs.contractinitiation@phila.gov

Location: DocuSign

Signer Events	Signature	Timestamp
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Crystal T. Espanol Crystal.Espanol@phila.gov Security Level: Email, Account Authentication (None)	DocuSigned by: Crystal T. Espanol 7777BBC1F7E44C9... Using IP Address: 170.115.248.25	Sent: 8/16/2017 2:01:16 PM Viewed: 8/18/2017 9:54:00 AM Signed: 8/18/2017 10:04:54 AM
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Jacqueline Dunn Jacqueline.Dunn@phila.gov City of Philadelphia Security Level: Email, Account Authentication (None)	Completed Using IP Address: 170.115.248.25	Sent: 9/19/2017 1:57:08 PM Viewed: 9/19/2017 6:18:26 PM Signed: 9/19/2017 6:18:32 PM
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Cynthia Figueroa cynthia.figueroa@phila.gov Security Level: Email, Account Authentication (None)	DocuSigned by: Cynthia Figueroa Using IP Address: 170.115.248.24	Sent: 9/19/2017 6:18:35 PM Viewed: 9/20/2017 2:08:49 PM Signed: 9/20/2017 2:09:25 PM
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Carbon Copy Events	**Status**	**Timestamp**
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Electronic Record and Signature Disclosure:		

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Kumar Roy kumar.roy@phila.gov Security Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Not Offered via DocuSign	COPIED	Sent: 8/16/2017 1:47:41 PM Viewed: 8/16/2017 1:54:17 PM
Rita Cairy rita.cairy@phila.gov Security Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Not Offered via DocuSign	COPIED	Sent: 8/16/2017 1:47:41 PM
Carolyn Pownall Carolyn.Pownall@phila.gov Security Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Not Offered via DocuSign	COPIED	Sent: 9/20/2017 2:47:11 PM Viewed: 9/20/2017 3:45:58 PM
Controller Contracts Controller.Contracts@phila.gov Security Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Not Offered via DocuSign	COPIED	Sent: 9/20/2017 2:47:11 PM
Linda Chaney linda.chaney@phila.gov Security Level: Email, Account Authentication (None) **Electronic Record and Signature Disclosure:** Not Offered via DocuSign	COPIED	Sent: 9/20/2017 2:47:11 PM

Notary Events	Signature	Timestamp

Envelope Summary Events	Status	Timestamps
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Signing Complete	Security Checked	9/20/2017 2:47:12 PM
Completed	Security Checked	9/20/2017 2:47:12 PM

Payment Events	Status	Timestamps
Electronic Record and Signature Disclosure		

EXHIBIT 15

Kinship Cares

A comprehensive kinship care curriculum for direct-service workers and caregivers. As the only agency in the country that exclusively delivers services to the entire kinship triad (child, caregiver, and birth parents) – its approach is pure kinship.

Quality Improvement Survey...for Caregivers & Birth Parents!

Read More »

Get Ready for Camp C.O.P.E.S.! Registration is Now Open...

Read More »

Be Intentional About Wellness and Work-Life Balance

Read More »

Vendor Survey...We want to be a better partner!

Read More »

Commitment to Diversity and Inclusion at A Second Chance...

Read More »

ABOUT ASCI

A Second Chance, Inc. (ASCI) is a non-profit corporation established in 1994.

Its mission is to provide a safe, secure, and nurturing environment to children who are being cared for by their relatives or a close family friend - formally called "kinship care".

ASCI became a subcontracting agency of Allegheny County Children and Youth Services (now called Allegheny County Children, Youth and Families [CYF]) in July, 1994.

* Our NEW website is currently under construction!! Please look for it in Summer/Fall of 2018!

CONNECT WITH ASCI

Find A Second Chance, Inc. on the following social sites:

EXHIBIT 16

Advertisement

News

Philly puts out 'urgent' call - 300 families needed for fostering

Updated: MARCH 8, 2018 — 11:24 AM EST

FOSTER11

View Gallery

MARK C PSORAS/FOR THE INQUIRER

Shakia Rembert enjoys a fun moment with her adopted son Alvin Sahr Rembert ,5, reading a story together at their home in North Philadelphia on Friday March 9, 2018.

by Julia Terruso, Staff Writer Twitter: @JuliaTerruso | Mail: jterruso@phillynews.com

The 2-year-old boy dropped off at Shakia Rembert's house wouldn't look at her as she welcomed him with a warm "hello." And after the social worker left, he ignored everything she said.

As a first-time foster mom, Rembert wondered what she was doing wrong. What trauma may Alvin have experienced

before arriving at her West Oak Lane home? After a few weeks of trying to connect with him, she realized it wasn't just her. He didn't answer anyone, nor startle when she dropped things. He was deaf.

COURTESY OF SHAKIA REMBERT

Shakia Rembert was a first-time foster mom when then 2-year-old Alvin came to her home. The Department of Human Services has put out an urgent call for more foster families.

The boy, who'd been removed from his mother's care as an infant, was living in a crisis nursery before going to stay with Rembert. A doctor would later tell Rembert that at least a year earlier she'd advised the boy's mother to have his hearing checked.

"It was alarming to to me," Rembert recalled. "Everyone missed this. No one was spending one-on one time with him. No one was talking to him the way you're supposed to talk to babies."

Experts agree that children do much better living in family settings than group homes because of the extra level of care and attention they receive.

Article continues below advertisement

But the city needs more families — about 300 more — to meet the need. The Department of Human Services put out an urgent call for parents this month, using phone banks and public service announcements. It's the first major recruitment in a decade.

They've changed the name of what they're seeking, too — from "foster parent" to "resource parent," reflecting a nationwide trend.

“We’re asking people to ask themselves, ‘Can I do this?’ ” said DHS Commissioner Cynthia Figueroa. “If the answer is ‘yes,’ that’s awesome. If, it’s ‘no,’ give us the name of other folks who you think would be excellent resource parents. The system alone can’t be the only resource. We need families who want to provide the best opportunity while families are having to deal with challenges.”

MARK C PSORAS / FOR THE INQUIRER

Shakia Rembert shares a tender moment with her adopted son Alvin Sahr Rembert, 5,at their home in North Philadelphia.

In Philadelphia about 700 children are in group home placements. Of those, Figueroa said, about 250 could be living with families, while 450 more need to stay in a staffed facility due to physical or emotional needs.

Figueroa hopes the campaign can dispel misconceptions about fostering: You don’t need to be married, own a house, or have a car, and there’s no expectation of adoption. Foster parents must be 21 but there’s no age cutoff. Retirees, often with more time to spare, make great foster parents, Figueroa said.

Article continues below advertisement

In addition to fostering, which can last anywhere from a few weeks to two years, the agency needs emergency placements — with families that can take children for just a few days. DHS also uses licensed families as “respite” placement, to give long-term foster parents a break or provide housing for kids older than 18, but might need somewhere to go temporarily, such as during a college break.

“We have a full menu of options,” Figueroa said.

If DHS determines that a child is in danger from abuse or neglect and must be taken from a family, the system looks first to relatives or close friends, then foster placements. As of March, 6,034 kids in Philadelphia were living in foster care, group homes, or with relatives or close friends (known as kinship care). That is 34 fewer than a year ago.

The application process for foster parents involves questions about the family background, employment, income, medical history, education, and community involvement. All adults in the home get criminal and child-abuse background checks.

For Rembert, the first few months caring for Alvin were tough. He drank out of the faucet, feared climbing into the bathtub, and became frustrated easily.

“It was understandable,” Rembert said. “He hadn’t really communicated with anyone” in the first years of his life.

Article continues below advertisement

She downloaded an American Sign Language app and started teaching him (and learning herself). She bought him Capri Suns and tiny bottles of water shaped like basketballs, which she handed him when he headed to the faucet. She experimented with colorful bath dyes to make tub-time more fun. When he got agitated, she'd settle him down by putting on one of her favorite movies, *The Little Rascals*.

Rembert provided Alvin with what he needed outside of her home, too. When she believed that a hospital wasn't giving him proper care, she made sure he was transferred to another institution, where he was fitted for a cochlear implant.

"They come in with absolutely nothing but the clothes on their back, no books, no school books," Rembert said. "Whatever resources you need, you have to fight for. But if your life is stable, and you make the decision to do this, it's the most rewarding experience in the world."

The city pays $20 to $36 a day depending on the age of the child. "Some people live off of the stipend," Rembert said. "That's going to be a frustrating situation for the parent and the children."

In the three years she fostered Alvin, Rembert also fostered a boy his age for a few months and later, four sisters. Siblings can be hard to place for space reasons, as can older children because most families request younger kids. There's also a great need for people who will welcome LGBT children and mothers with babies.

Sheina Martinez, 32, works as a foster parent recruiter for Bethany Christian Services. She saw firsthand how badly the system needed caring homes.

Article continues below advertisement

“We’ll get 200 requests a month from DHS and we’ll be able to place maybe 10 of them,” she said. “The need over-exceeds what we have the ability to place. … We’re sending infants sometimes to infant shelters.” (DHS works with several providers in addition to Bethany to place children).

JAMES BLOCKER/STAFF PHOTOGRAPHER

Frequent foster parents Sheina Martinez, a social worker, and Andy Martinez, a firefighter, gather in front of a wall of photographs with their two children, Jada, 13, and Andre, 10. As of now, they are not looking after any children, but Sheina says she could get the call at any moment.

Martinez and her husband Andy, along with their two children, now 13 and 10, added their home to the list of certified foster family options four years ago. They have cared for eight children. All have since been reunited with their families or relatives.

“A lot of people foster in hopes they will adopt,” Martinez said. “They fall in love, naturally, of course. But I always tell people … this child has been with their family 10 years so multiply that love you feel tenfold. If my kids were to go into foster care, I would really appreciate their resource parents supporting me, cheering me on.”

Rembert didn’t have adoption in mind when she started caring for Alvin, but when it became clear his family could not provide a safe, long-term home for him, she jumped at the chance to be his mom. They had spent close to three years together at that point. He was a happy little boy who loved basketball, baseball, swimming, and chicken wings. He was doing well in pre-K and hearing well enough to almost speak in full sentences.

Article continues below advertisement

In January, shortly after his fifth birthday, Alvin became Rembert’s son in a family court hearing. He wore a blue Sixers jersey and a gold plastic crown. She wore mini pom-poms in her hair and carried a pendant that read “Go

Rembert." An elated crew of family members and friends took turns high-fiving the little guy, lifting him for hugs.

Once the commotion had died down, as the two headed to the elevator to leave, Rembert made sure to steal her moment, nuzzling her son close to tell him how much she loved him.

He heard her just fine.

Interested in fostering? Call 215-683-5709 or email to fosteringphilly@phila.gov . Learn more at is beta.phila.gov/fosteringphilly

MORE COVERAGE

Amid daunting odds, Philly student shines
Dec 24 - 1:47 PM

When a foster child runs away, answers are hard to find
Dec 15 - 9:25 AM

How foster care can help children heal and grow
Aug 9 - 5:00 AM

Want to give back? These retirees joined nonprofits, or started their own
Sep 29 - 1:09 PM

Foster-care kids need a chance to succeed
May 16 - 4:53 PM

Published: March 8, 2018 — 5:31 PM EST

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EXHIBIT 17

Attachment B

Council of the City of Philadelphia
Office of the Chief Clerk
Room 402, City Hall
Philadelphia

(Resolution No. 180252)

RESOLUTION

Authorizing the Committee on Public Health and Human Services to investigate Department of Human Services' policies on contracting with social services agencies that either discriminate against prospective LGBTQ foster parents or allow non-LGBTQ foster parents to discriminate.

WHEREAS, Currently, approximately 700 children in Philadelphia are residing in group home placements, and according to the Philadelphia School Notebook more than 8,000 children were in foster care at some point during 2016; and

WHEREAS, In March 2018 the Department of Human Services announced its first major recruitment of foster parents in more than a decade—putting out an urgent call for 300 parents which included specific appeals to the LGBTQ community—to help move children from group homes into family settings; and

WHEREAS, The Department of Human Services currently has contracts with several social service providers for foster care placement and adoption services which were collectively reimbursed by the City for $3 million in 2017; and

WHEREAS, According to Section 14.1 of the City of Philadelphia Professional Services Contract, providers "shall not discriminate or permit discrimination against any individual because of race, color, religion, ancestry or national original, sex, gender identity, sexual orientation, age or disability"; and

WHEREAS, At least two of these providers have policies that prohibit the placement of children with LGBTQ people based on religious principles, although the City of Philadelphia has laws in place to protect its people from discrimination that occurs under the guise of religious freedom; and

WHEREAS, The Fair Practices Ordinance is the City's local anti-discrimination law, enacted in 1963 to prohibit discrimination in Philadelphia in employment, housing, and

places of public accommodation in addition to covering over 16 protected categories such as race, religion, national origin, age, sex, disability, sexual orientation, and gender identity; and

WHEREAS, Any agency which violates City contract rules in addition to the Fair Practices Ordinance should have their contract with the City terminated with all deliberate speed; and

WHEREAS, The Department should also conduct a thorough review of its contracts with all of its 26 foster care agencies to ensure that providers are adhering to anti-discrimination policies as they pertain to the City's protected classes, now, therefore, be it

RESOLVED, BY THE COUNCIL OF THE CITY OF PHILADELPHIA, That it hereby authorizes the Committee on Public Health and Human Services to investigate Department of Human Services' policies on contracting with social services agencies that either discriminate against prospective LGBTQ foster parents and allow non-LGBTQ foster parents to discriminate against children.

CERTIFICATION: This is a true and correct copy of the original Resolution, Adopted by the Council of the City of Philadelphia on the fifteenth of March, 2018.

Darrell L. Clarke
PRESIDENT OF THE COUNCIL

Michael A. Decker
CHIEF CLERK OF THE COUNCIL

Introduced by: Councilmembers Bass, Green, Gym and Parker

Sponsored by: Councilmembers Bass, Green, Gym, Parker, Reynolds Brown, Jones, Blackwell, Greenlee, Squilla, Oh and Johnson

EXHIBIT 18

Attachment C

CITY OF PHILADELPHIA

COMMISSION ON HUMAN RELATIONS
601 Walnut Street, Suite 300 South
Philadelphia, PA 19106
Telephone (215) 686-4670
Fax (215) 686-4684

THOMAS H. EARLE, ESQUIRE
Chairperson

RUE LANDAU, ESQUIRE
Executive Director

March 16, 2018

RECEIVED
MAR 20 2018

Reverend John J. McIntyre
Board President
Catholic Social Services
Auxiliary Bishop, Archdiocese of Philadelphia
222 North 17th Street, 3rd Floor,
Philadelphia, PA 19103

We are writing in response to the March 13, 2018 Philadelphia Inquirer article, *Two Foster Agencies in Philly Won't Place Kids with LGBTQ People* that indicated Catholic Social Services (CSS) is denying services to same sex couples, and other individuals in the lesbian, gay, bisexual, transgender, and Queer (LGBTQ) community.

The Philadelphia Commission on Human Relations (PCHR) is the city agency charged with enforcing the anti-discrimination laws, particularly the city's Fair Practices Ordinance, Chapter 9-100 of the Philadelphia Code. The Fair Practices Ordinance prohibits discrimination in employment, housing, and public accommodations, including the delivery of city services in over sixteen protected categories, including sexual orientation and gender identity.

This nondiscrimination language is memorialized in Article XIV, Section 15.1 of the City's Professional Services Contract with your organization. Specifically, the contract states,

> [t]his Contract is entered into under the terms of…the Fair Practices Ordinance (Chapter 9-1100 of the Code)…Provider [shall not] discriminate or permit discrimination against individuals in employment, housing and real property practices, and/or public accommodation practices whether by direct or indirect practice of exclusion, distinction, restriction, segregation, limitation, refusal, denial, differentiation or preference in the treatment of a person on the basis of actual or perceived race, ethnicity, color, sex, sexual orientation, gender identity, religion, national origin, ancestry, age, disability, marital status, source of income, familial status…or engage in any other act or practice made unlawful under…Chapter 9-1100…

The contract also provides that "[i]n the event of any breach of this Section 15.1 (Non-Discrimination; Fair Practices), the City may, in addition to any other rights or remedies available under this Contract, at law or in equity, suspend or terminate this Contract forthwith."

According to the aforementioned article, CSS administrator Ken Gavin said, "The Catholic Church does not endorse same-sex unions, based upon deeply held religious beliefs and principles. As such, CSS would not be able to consider foster care placement within the context of a same-sex union."

Based on the information provided in the article, it appears that CSS may be in violation of Article XIV, Section 14.1. Accordingly, we are writing to ask that you provide written responses to the questions below. Please note that any reference to "foster parent" is inclusive of foster parent(s), kinship parent(s), and/or pre-adoptive foster parent(s).

1) What are your policies for selecting foster care families? Please provide a copy of these policies in writing if available;

2) Are LGBTQ individuals, whether married or single, eligible to become foster parents with CSS?

3) Does CSS ask individuals or couples who apply to be foster parents if any household member identifies as LGBTQ? List and describe all instances in which CSS rejected attempts by persons identifying as LGBTQ to serve as foster parents.

4) Does CSS have a policy that denies services to any individual based on their sexual orientation? If so, please provide any applicable policy;

5) Does CSS have a specific policy that denies services to people based on their gender identity? If so, please provide any applicable policy;

6) Does CSS provide foster care placement to LGBTQ youth?

7) Does CSS have a policy that prohibits the completion of Adoption or Permanent Legal Custodianship (PLC) family Profiles for LGBTQ individuals whether married or single?

8) Do you have authority as a local affiliate/branch of the larger organization to create or follow your own policies?

9) If CSS has policies that deny services to people based on their sexual orientation or gender identity, are you willing to revise your policies so that all people can have equal access to your services?

10) If CSS subcontracts any of the services it is obligated to provide under its contract with the City, please provide the name and location of each entity and/or individual.

Once the requested information is provided, PCHR would like to arrange a meeting to further discuss CSS's policies with regard to the placement of foster care children and the provision of associated services to foster care children and the families with whom they are placed. If it is determined that CSS is in violation of its contract with the City, we would also like to explore potential remedies to bring CSS into compliance with the non-discrimination provisions of its contract.

Please provide responses to these questions within 10 days.

Sincerely,

Rue Landau, Esquire
Executive Director

Thomas H. Earle, Esquire
Chairperson

cc: Marcel S. Pratt, Acting City Solicitor
Cynthia Figueroa, DHS Commissioner

EXHIBIT 19

Attachment I

CITY OF PHILADELPHIA

DEPARTMENT OF HUMAN SERVICES
1515 Arch Street, Philadelphia, PA 19102
215-683-4DHS (4347)

Commissioner
CYNTHIA F. FIGUEROA

First Deputy Commissioner
JESSICA S. SHAPIRO

Deputy Commissioners

Children and Youth
GARY D.WILLIAMS

Juvenile Justice Services
TIMENE FARLOW

Administration and Management
VONGVILAY MOUNELASY

Performance Management and Accountability
LIZA RODRIGUEZ

F/Y 2017

October 13, 2016

James Amato, Secretary, Catholic Human Serv.
Catholic Social Services,Archdiocese of Phila.
222 North 17th Street, Room 328
Philadelphia, PA 19103

RE: Contract #17-20359

Dear Mr. Amato:

Enclosed is a copy of your conformed **PROVIDER AGREEMENT** for Fiscal Year 2017.

Should you have any questions, please feel free to call me at (215) 683-4251.

Sincerely,

Judith Jones/co

Judith Jones
Contract Coordinator

/co
Enclosure

CONFORMED

Contract Number 17-20359
(250) IOC CUA#4

OCT 13 2016

City of Philadelphia
Department of Human Services

PROVIDER AGREEMENT

Department of Human Services

THIS PROVIDER AGREEMENT is made as of the 13th day of October 20 16, by and between the City of Philadelphia (the "City"), by and through its Department of Human Services ("Department") and **CATHOLIC SOCIAL SERVICES** ("Provider"), a nonprofit corporation, with its principal place of business at **222 NORTH 17TH STREET, PHILADELPHIA, PENNSYLVANIA 19103.**

BACKGROUND

The City and Provider desire that Provider render various services to the City, in accordance with the provisions of this Provider Agreement, the City of Philadelphia Professional Services Contract General Provisions for the Department of Human Services Improving Outcomes for Children Community Umbrella Agency Contracts (the "IOC CUA General Provisions" or "General Provisions"), Cross Agency Response for Effective Services ("CARES") Limited License Agreement (when applicable) and all of the other attachments, exhibits, and documents which together constitute the Contract Documents as defined in the IOC CUA General Provisions. A copy of the IOC CUA General Provisions is attached hereto and incorporated herein by reference. A copy of the CARES Limited License Agreement is available on the Provider Extranet (http://dhs.phila.gov/extranet/extrahome_pub.nsf/Content/ServiceStandards) and incorporated by reference. A copy of the applicable below referenced Performance and Service Standards formerly known as Service Description and Contract Requirements, Service Description, Performance Standards, Service Standards, Procedural Manuals and/or Guides ("Standards") are available on the Provider Extranet (http://dhs.phila.gov/extranet/extrahome_pub.nsf/Content/ServiceStandards) and incorporated by reference.

CITY OF PHILADELPHIA

DEPARTMENT OF HUMAN SERVICES
1515 Arch Street, Philadelphia, PA 19102
215-683-4DHS (4347)
www.phila.gov/dhs

Commissioner

VANESSA GARRETT HARLEY

Deputy Commissioners

GARY WILLIAMS, CYD
TIMENE FARLOW, JJS
CHANELL HANNS, FINANCE

December 1, 2015

Joseph Sweeney, Executive VP
Catholic Social Services of the Archdiocese of Philadelphia
222 North 17th Street, Rm 328
Philadelphia, PA 19103

Re: Contract #: 16-20030

Dear Mr. Sweeney:

Enclosed is a copy of your conformed **PROVIDER AGREEMENT** for Fiscal Year 2016.

Should you have any questions, please feel free to call me at (215) 683-4253.

Sincerely,

Rita Cairy
Contract Coordinator

RC/kb
Enclosure

CONFORMED

NOV 30 2015

Contract Number 16-20030
(290) Placement Services

City of Philadelphia
Department of Human Services

PROVIDER AGREEMENT

Department of Human Services

THIS PROVIDER AGREEMENT is made as of the 30th day of November 20 15, by and between the City of Philadelphia (the "City"), by and through its Department of Human Services ("Department") and **CATHOLIC SOCIAL SERVICES** ("Provider"), a **STATE OF PENNSYLVANIA NON-PROFIT CORPORATION**, with its principal place of business at **222 N. 17TH STREET, ROOM 328, PHILADELPHIA, PENNSYLVANIA 19103**.

BACKGROUND

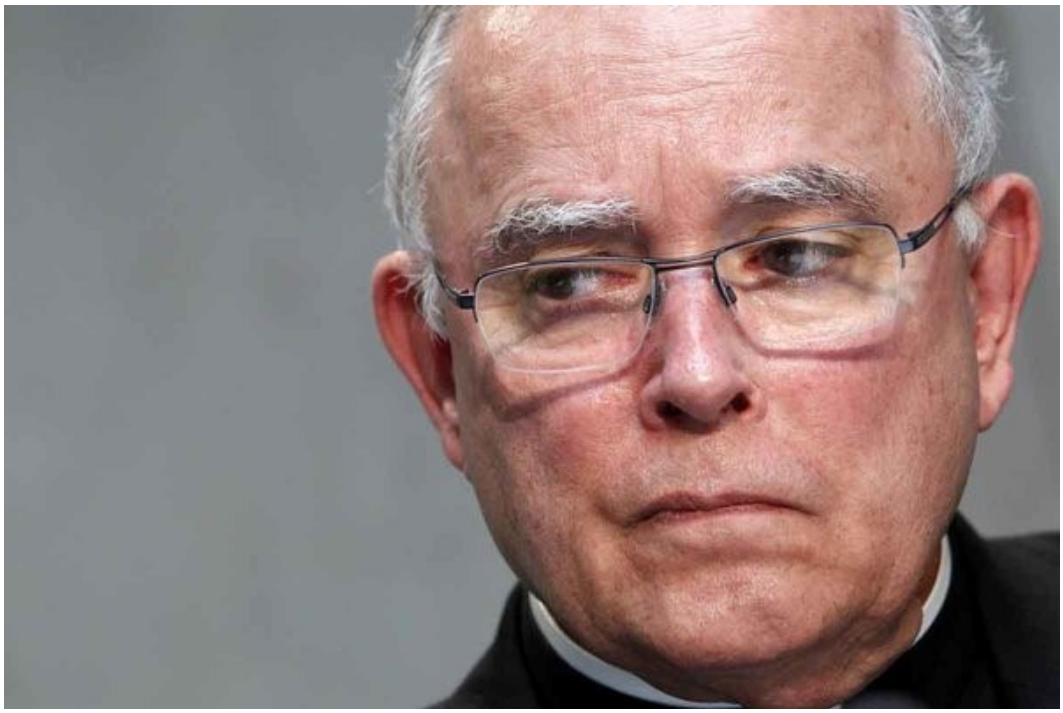
The City and Provider desire that Provider render various services to the City, in accordance with the provisions of this Provider Agreement, the City of Philadelphia Professional Services Contract General Provisions for the Department of Human Services (the "General Provisions"), Cross Agency Response for Effective Services ("CARES") Limited License Agreement (when applicable) and all of the other attachments, exhibits, and documents which together constitute the Contract Documents as defined in the General Provisions. A copy of the General Provisions is attached hereto and incorporated herein by reference. A copy of the CARES Limited License Agreement is available on the Provider Extranet (http://dhs.phila.gov/extranet/extrahome_pub.nsf/Content/ServiceStandards) and incorporated by reference. A copy of the applicable below referenced Performance and Service Standards formerly known as Service Description and Contract Requirements, Service Description, Performance Standards, Service Standards, Procedural Manuals and/or Guides ("Standards") are available on the Provider Extranet (http://dhs.phila.gov/extranet/extrahome_pub.nsf/Content/ServiceStandards) and incorporated by reference.

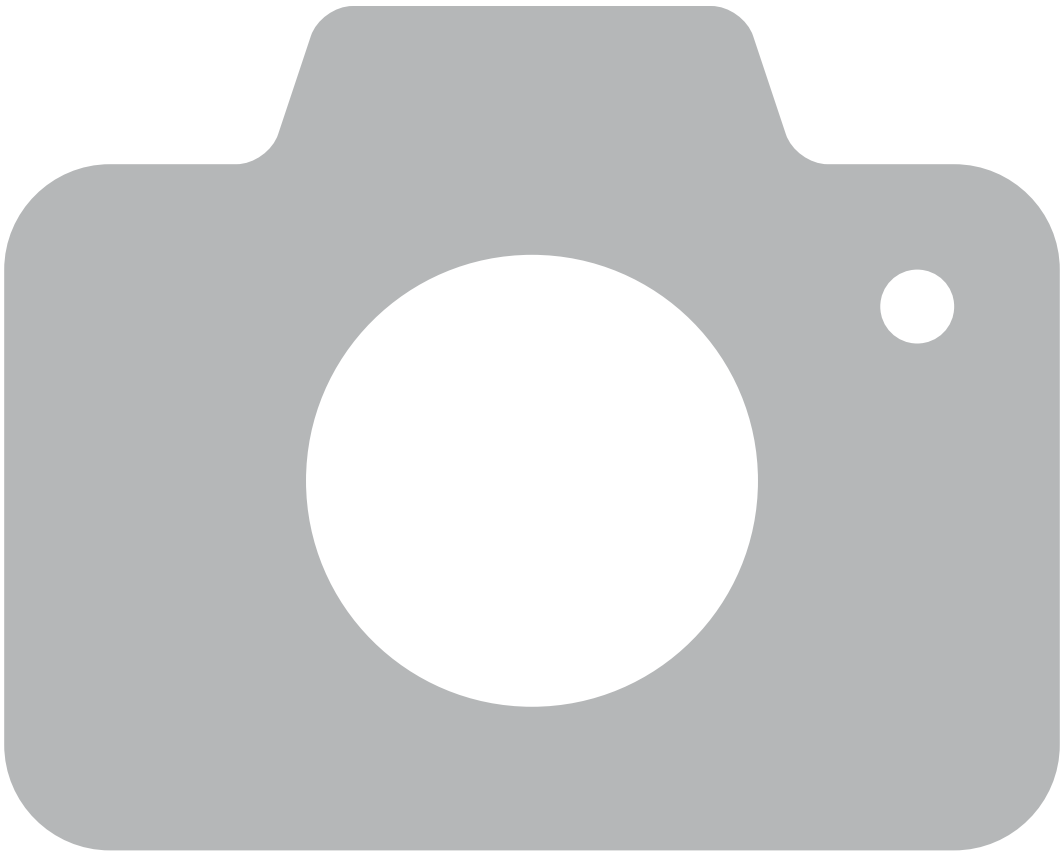
In consideration of the mutual obligations set forth herein, and intending to be legally bound, the City and Provider covenant and agree as follows:

EXHIBIT 20

Attachment J

Chaput edict draws mixed reviews; Kenney calls it 'not Christian'





AP

Photo/Riccardo De Luca, File

In this June 25, 2015, file photo, Archbishop Charles Chaput attends a news conference at the Vatican.

Mayor Kenney on Wednesday denounced as "not Christian" Archbishop Charles J. Chaput's insistence that Catholics living in relationships the church considers sinful may not receive Holy Communion or hold positions of responsibility in parishes.

Related links

-

- From 2016: Abuse victim: Chaput canceled face-to-face after media attention
- Polaneczky: Who's more Christian - Kenney or Chaput?
- Flowers: Chaput controversy is a sham
- Commentary: Chaput edict is a sound lesson
- Letters: Archbishop Charles Chaput's arrogant contradiction of Pope Francis
- Chaput: No Communion for sexually active gay, unwed or divorced couples

Kenney's was among the sharper reactions Chaput's decree drew from around the region. Some were swift to denounce the archbishop as an "old white man" whose church was out of touch.

Others, though, hailed the archbishop for upholding traditional church teaching or deferred with a shrug to his authority.

The mayor, who was raised Catholic, has often been sharply critical of Chaput's conservative stances on matters of faith.

On Friday, Chaput posted on the archdiocesan website six pages of guidelines for clergy and other local church leaders on how to implement *Amoris Laetitia,* a major document on the family Pope Francis issued in April.

Some theologians have said *Amoris* calls on church leaders to be more welcoming of Catholics who are estranged from parish life because the church disapproves of their sexual relationships.

Chaput was emphatic that this does not mean Francis has reformulated the church's traditional ban on Communion for those Catholics who live in what the church views as sin - such as divorced Catholics who remarry outside the church, sexually active gays, and cohabiting unmarried couples.

In *Amoris*, Francis "states clearly that neither Church teaching nor the canonical discipline concerning marriage has changed," Chaput remarked in his guidelines.

Holy Communion is a central element of the Catholic faith, which holds that the prayers a priest utters over bread and wine during Mass transform them physically into the body and blood of Jesus.

Barring a person from receiving Communion does not mean that he or she is excommunicated. But many of those barred have complained of feeling shunned, embarrassed, or marginalized.

Many laypeople and clergy had hoped Francis might ease the church's position regarding Communion in *Amoris Laetitia*, but despite his call for clergy to listen compassionately to the pain of those who feel excluded, he did not make any explicit changes to the teaching.

Chaput's guidelines may be the first of their kind issued by the bishop of any American diocese in response to *Amoris Laetitia,* Latin for "the joy of love."

Chaput's position did not upset Lydia Carbone, a member of St. Patrick's parish in Center City.

"It's not for me to judge the church's teachings," she said.

Unmarried after a divorce more than 16 years ago, she has led programs at her parish designed to help the newly divorced understand the church's stance that they may not remarry in the faith unless their first marriage is declared invalid by a diocesan tribunal.

But she was pleased, she said, that Pope Francis "seems to be opening dialogue in the gray areas" around divorce and remarriage. "I'm hoping the church will be more open and welcoming."

Others were fuming.

An article on the guidelines in Wednesday's Inquirer generated more than 1,000 comments, most of them harshly critical of Chaput.

Across the street from the Cathedral of SS Peter and Paul, an 18-year-old Catholic questioned the wisdom of the guidelines Wednesday afternoon.

"It's isolating people," said Mia Trotz, a college student in Philadelphia selling water ice at Sister Cities Park.

But Carl Miller, 58 and gay, said he admired Chaput for his stance. "I believe the Catholic Church's teachings are ultimate truth," said Miller.

"I struggle with living it perfectly," said Miller, who attends Mass weekly and receives Communion, "but I think the archbishop is right in restating what the Catholic teaching is." He declined to name his hometown or parish.

A large part of the debate involves just what Francis meant to say about the inclusion in parish life of unmarried but cohabiting Catholics, those in same-sex relationships, and the estimated 4.5 million who are divorced and remarried without an annulment.

"It's being read in different ways by different individuals and different bishops," said John Grabowski, associate professor of moral theology at Catholic University of America.

Grabowski, an authority on *Amoris Laetitia*, noted that in one place Francis writes that priests have the duty to accompany those who divorce and remarry outside the church "in helping them to understand their situation according to the teaching of the Church and the guidelines of the bishop."

But Grabowski noted that Francis also wrote in *Amoris* that "I would also point out that the Eucharist 'is not a prize for the perfect, but a powerful medicine and nourishment for the weak.' "

And for those struggling to reconcile what appear to be Francis' positions, Grabowski pointed to yet more lines from the pope:

"I understand those who prefer a more rigorous pastoral care which leaves no room for confusion," wrote Francis. "But I sincerely believe that Jesus wants a Church attentive to the goodness which the Holy Spirit sows in the midst of human weakness, a Mother who, while clearly expressing her objective teaching, always does what good she can, even if in the process, her shoes get soiled by the mud of the street."

"I don't want to say this is murky," said Grabowski, "but it's not crystal clear. So what happens is that people find support for differing positions. So it's going to be up to different bishops to decide how this document should be implemented in their dioceses."

doreilly@phillynews.com

856-779-3841

Staff writer Robert Moran contributed to this article.

More Coverage

- Chaput: No Communion for sexually active gay, unwed or divorced couples
  Jul 6 - 11:59 PM

Published: July 6, 2016 — 6:57 PM EDT | **Updated:** July 6, 2016 — 11:04 PM EDT
The Philadelphia Inquirer

EXHIBIT 21

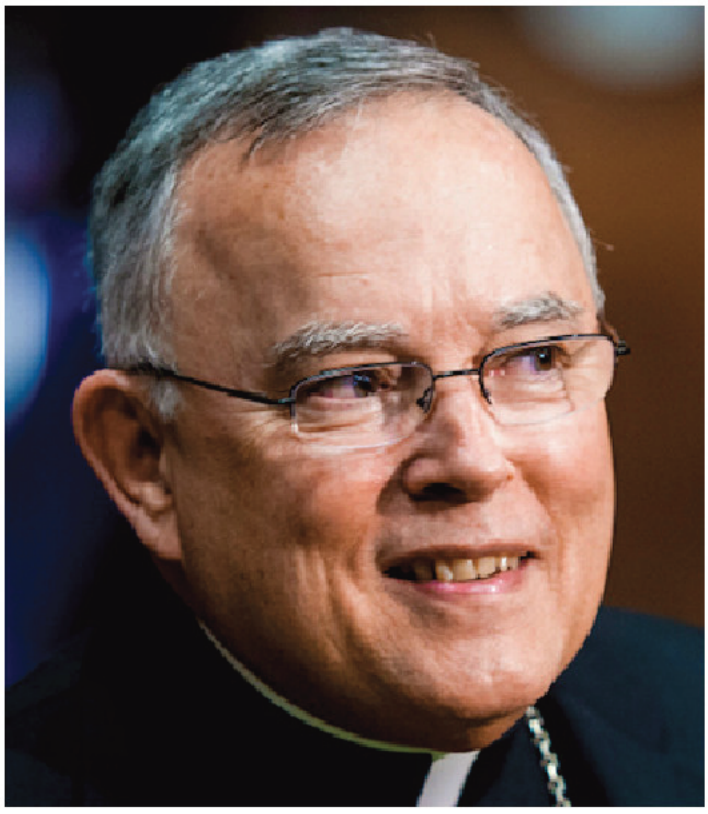
Attachment K

Philadelphia

Jim Kenney's Long War with the Archdiocese

The mayoral nominee is a disaffected Catholic disgusted by local church leadership.

by **PATRICK KERKSTRA** • *7/9/2015, 11:23 p.m.*



Charles Chaput and Jim Kenney. | Photos by Jeff Fusco.

Democratic mayoral nominee Jim Kenney is a proud graduate of St. Joe's Prep *and* La Salle. He was born and raised in a Irish Catholic family. He is the single most devoted fan of the Neuman-Goretti women's basketball team in the world.

And yet, Kenney's relationship with the Catholic Church is fraught. Actually, the more accurate adjective is probably just "hostile." Kenney showed vividly just how little regard he has for local

"cowardly men" in the Archdiocese of Philadelphia of orchestrating the firing. "If you're a church official and you feel that strongly that this woman and her partner are such a threat to society, stand up and say so," Kenney told the paper.

That might seem like extraordinarily blunt language coming from the likely next mayor of the city and aimed not-so-subtly at Archbishop Charles J. Chaput. But it's actually not all that different from Kenney's past public statements about the archdiocese. Like the time he urged Pope Francis to "kick some ass" in the archdiocese.

Kenney began feuding with the archdioceses as far back as 1998, when Catholic leaders mobilized to block a City Council bill granting benefits to partners of gay city employees that Kenney co-sponsored. More recently, he's sparred with archdiocesan leadership over the closing of parochial schools, publicly criticized their decision to ban an 11-year-old girl from playing CYO football and wished out-loud that Pope Francis will straighten out Chaput and company when he comes to town in September.

In a lot of respects, of course, Kenney's fight with the archdiocese is just a microcosm of the broader debate playing out in the Catholic community. Church conservatives, like Chaput, are digging in, even as the broader culture embraces marriage equality. Liberal catholics, like Kenney (and a lot of other Philadelphia catholics), desperately want the church to change with the times, not just on gay marriage, but on the role of women and a host of other issues. The ascension of liberal Pope Francis has raised the stakes of the debate. And now the liberal Francis is coming to Philadelphia, where he'll be hosted by the very-conservative Chaput, all while Kenney (who can summon dozens of news cameras and microphones whenever he likes) looks on....

Does this latest episode hurt Kenney at all? Might he have alienated true-blue city Catholics with his criticism? It's certainly possible that it will, but it's also likely to further enhance Kenney's standing in progressive circles and among gay voters.

The harder question is this: should a mayor speak so bluntly on such charged issues? Or is it unbecoming of the office to weigh in so strongly so quickly? This is a controversy about a school outside city limits, after all. Mayor Nutter hasn't issued any press releases.

There's no simple answer to that one. Mayors do need to exercise more discretion than Council members. Mayors are emissaries for the whole city, and Philadelphia is a complicated place that's home to people with a lot of different beliefs.

But for Kenney, justice is justice, and a wrong is a wrong. He doesn't take a black-and-white approach to everything. But on certain matters — like gay equality, like gender equality — Kenney is a moral absolutist, and he's not going mince words or avoid fights, even if he does become mayor. Lauren Hitt, Kenney's communications director, told me a while back in a conversation about a completely different topic that he "has an annoyingly strong moral compass." Right now, Kenney's moral compass is the pointing in the polar opposite direction of the Archdiocese of Philadelphia. And in recent years, Kenney has been his most convincing — and his popular appeal has been strongest — when he has framed his policy preferences in stark moral terms.

We just put in a request with Kenney's campaign to talk to him about his faith and his relationship with the Catholic church, and if he's got time for an interview we'll bring you his answers in depth.

But Kenney being Kenney, a lot of his feelings are already out there on Twitter. See below.

Jim Kenney
@JimFKenney

The sisters who do the work for meager salaries, will be the only ones who save the Catholic Church #whatsistersmeantome

10:33 AM - Apr 23, 2012

See Jim Kenney's other Tweets

Jim Kenney
@JimFKenney

9:44 AM - Jun 25, 2012

See Jim Kenney's other Tweets

Miriamhill @Miriamhill Jul 12, 2012
Replying to @myantkinney
@myantkinney so hard to know, b/c so few women in leadership positions.

Jim Kenney
@JimFKenney

@Miriamhill Monica, I agree. Same prob with the Catholic Church. Too male centered with no opportunity for dissent.
11:01 AM - Jul 12, 2012

See Jim Kenney's other Tweets

Jim Kenney
@JimFKenney

On Action News tonight; why would the Archdiocese of Phila try to stop a young girl from playing CYO Football with the boys if she is able?
12:09 AM - Jan 7, 2013

See Jim Kenney's other Tweets

Jim Kenney
@JimFKenney

@SheinelleJones Every girl should be able to compete at any level she is capable. Why would the Archdiocese keep her from being her best?
8:06 AM - Jan 7, 2013

See Jim Kenney's other Tweets

Jim Kenney
@JimFKenney

fb.me/25XJ5EvlX

3:13 PM - Jan 9, 2013

See Jim Kenney's other Tweets

Jim Kenney
@JimFKenney

Thank you to Archbishop Chaput for making the right decision and to Caroline for being so determined! fb.me/2ooBk5vib

4:03 PM - Mar 14, 2013

See Jim Kenney's other Tweets

Jim Kenney
@JimFKenney

Having been Jesuit-educated myself, I've always had confidence and trust in their commitment to fairness and... fb.me/115hpc9S5

1:35 PM - Jul 29, 2013

See Jim Kenney's other Tweets

Brian P. Hickey @BrianPHickey Jul 29, 2013
Replying to @JimFKenney
@JimFKenney I'm not running back to church but I'm down with new Pope.

Jim Kenney
@JimFKenney

@BrianPHickey Just taking a few steps in that direction. Moral authority was lost. Pope Frank might repair much of that. I pray!

9:11 PM - Jul 29, 2013

See Jim Kenney's other Tweets

Jim Kenney
@JimFKenney

Saddened by the closing of 49 Catholic schools. I feel for the students & teachers affected by this decision ow.ly/8lvkr

Jim Kenney
@JimFKenney

Archbishop Chaput: Philadelphians 'confused' by Pope Francis's words po.st/veMrff via @po_st I wasn't confused at all.

4:34 PM - Sep 26, 2013

Archbishop Chaput: Philadelphians 'confused' by Pope Franc…
Six days after the release of an extensive interview with Pope Francis in a Jesuit journal, Philadelphia Archbishop Charles Chaput
philly.com

1 See Jim Kenney's other Tweets

Jim Kenney
@JimFKenney

Watching CNN. Pope Francis is awesome! Freaking awesome! Makes me want to turn back to my church. I worry about him though.

7:50 PM - Dec 24, 2013

3 See Jim Kenney's other Tweets

Mike Jerrick @MikeFOX29 Mar 8, 2014
Lets do this! RT @JimFKenney: @MikeFOX29 How about a regional effort to Tweet @Pontifex to come to Philly in 2015 to bless us in person?

@MikeFOX29 @Pontifex Pope Francis is a social media guy. The Muckety Mucks are going to Rome but Papa listens to the real people!

3:43 PM - Mar 8, 2014

1 See Jim Kenney's other Tweets

Follow @pkerkstra and @CitifiedPHL on Twitter.

Read More About:

Archdiocese of Philadelphia Charles Chaput Jim Kenney

You Might Also Like

The Coolest Ice Cream Shops in Philadelphia

EXHIBIT 22

Attachment P

Children & Families
- Therapeutic Foster Care
- CRR Host Home
- Mother/Baby Host Home
- Behavioral Health Rehabilitation Services
- Case Management & Resource Coordination Services
- Relief Support
- Emergency After Hours Placement Response Service
- Family-Based Services

Adults with Disabilities

Mother/Baby Host Home

It takes a village to raise a child, and at Pennsylvania MENTOR, we help build a community of support for the young mothers we serve. In this program, young mothers living in the homes of our foster parents, who we call Mentors, receive intensive case management services to help them be the best moms they can be. The teenage girls are in foster care when they are pregnant or have already given birth. The baby lives with their mother in the Mentor's home. As long as it remains in the best interest of the child, the mother maintains full custody. Through our Mother Baby Host Home program, we help these young mothers learn how to support and care for their child.

Personalized Support

Our dedicated program service coordinators visit the young mothers in their Mentors' homes. We make sure the young mothers are working with the support system we help them develop, a support system that includes:

- Parenting classes
- Independent living classes
- Day care
- Support groups
- Access to health care, WIC, and transportation

Our experienced team is available to the young mothers 24/7, offering constant guidance and support. Our goal is to make sure these young women have everything they need to be the best moms possible.

This program is available in Philadelphia, Bucks, Montgomery, Delaware, and Chester Counties. Please call 215-925-3461 *5025 for more information.

If you would like to help a young mother and her baby have the best start possible, go to www.makeadifferenceathome.com to learn more about becoming a Mentor!

EXHIBIT 23

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA

\- - -

SHARONELL FULTON, ET AL	:	**CIVIL DOCKET FOR CASE**
	:	**NO. 18-2075**
-VS-	:	
	:	
CITY OF PHILADELPHIA, ET AL	:	

\- - -

PHILADELPHIA, PA.

JUNE 18, 2018

BEFORE HONORABLE JUDGE PETRESE B. TUCKER

TEMPORARY RESTRAINING ORDER

DAY 1

APPEARANCES:

FOR THE PLAINTIFF: **BECKET FUND FOR RELIGIOUS LIBERTY**
BY: LORI H. WINDHAM, ESQ.
MARK L. RIENZI, ESQ.
STEPHANIE H. BARCLAY, ESQ.
1200 NEW HAMPSHIRE AVE, N.W.
SUITE 700
WASHINGTON, DC 20036

FOR THE DEFENDANTS: **CITY OF PHILADELPHIA LAW DEPARTMENT**
BY: ELEANOR N. EWING, ESQ.
BENJAMIN H. FIELD, ESQ.
SCHAUNDRA OLIVER, ESQ.
1515 ARCH STREET, 16TH FLOOR
PHILADELPHIA, PA 19102

LYNN MCCLOSKEY, RPR
OFFICIAL COURT REPORTER
1234 US COURTHOUSE
601 MARKET STREET
PHILADELPHIA, PA 19106
(856) 649-4774

FOR THE DEFENDANTS: MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN
BY: DIANA P. CORTES, ESQ.
2000 MARKET STREET, SUITE 2300
PHILADELPHIA, PA 19103

THE COURT: GOOD AFTERNOON.

ALL COUNSEL: GOOD AFTERNOON, YOUR HONOR.

THE COURT: YOU MAY BE SEATED. THIS MATTER IS HERE FOR ARGUMENT ON A TEMPORARY RESTRAINING ORDER FILED BY CATHOLIC SERVICES AMONG OTHER PLAINTIFFS AGAINST THE CITY OF PHILADELPHIA. THERE IS A PETITION TO INTERVENE THAT WAS FILED. HAVE THERE BEEN ANY DISCUSSIONS BETWEEN THE PARTIES ON THAT MOTION AND THE PARTIES IN THE RESTRAINING ORDER AS TO WHETHER THERE IS AN AGREEMENT, NOT AN AGREEMENT, AS TO THE MOTION TO INTERVENE?

MS. WINDHAM: YOUR HONOR, WE HAVE NOT HAD ANY DISCUSSIONS REGARDING THE MOTION TO INTERVENE.

THE COURT: WOULD DISCUSSIONS BE FRUITFUL?

MS. WINDHAM: YOUR HONOR, WE WOULD BE PREPARED TO FILE A BRIEF. WE JUST RECEIVED THEIR INTERVENTION MOTION, THEIR BRIEF ON INTERVENTION MOTION LAST FRIDAY. PLAINTIFFS WOULD BE HAPPY TO FILE A RESPONSE TO THAT IN THE REGULAR TIME THAT IS ALLOTTED. I CAN ADDRESS THAT VERY BRIEFLY TODAY, BUT I BELIEVE THAT IT WOULD PROBABLY BE MOST FRUITFUL TO JUST PERMIT THE NORMAL BRIEFING ON THE MOTION TO INTERVENE.

THE COURT: OKAY. ANY ADDITION TO ADD TO THAT?

MS. CORTES: NO, YOUR HONOR. THE ONLY THING THAT I WOULD ADD IS THAT WE DO NOT HAVE ANY OBJECTION TO THE MOTION TO INTERVENE.

THE COURT: OKAY. AT THIS POINT THE COURT WILL ACCEPT THE BRIEFING AS AN AMICUS SO THAT WE CAN PROCEED WITH THE ISSUE AT HAND.

IF THE PARTIES WOULD LIKE TO MAKE AN OPENING STATEMENT, I WILL FIRST HEAR FROM COUNSEL FOR CATHOLIC SERVICES.

MS. WINDHAM: THANK YOU, YOUR HONOR. LORI WINDHAM FOR PLAINTIFFS. IF I MAY, I DON'T KNOW IF YOUR HONOR HAS A PARTICULAR SCHEDULE SET FOR THE HEARING THIS AFTERNOON. WE WOULD LIKE TO PROPOSE 15 MINUTES PER SIDE FOR OPENING STATEMENTS, AN HOUR FOR THE PLAINTIFFS' WITNESSES, AN HOUR FOR DEFENDANTS' WITNESSES IF THEY CHOOSE TO CALL ANY, AND THEN TEN MINUTES PER SIDE FOR CLOSING STATEMENTS.

THE COURT: WELL, WE WILL PLAY IT BY EAR.

MS. WINDHAM: CERTAINLY.

THE COURT: BUT WE WILL KEEP THOSE SUGGESTIONS IN MIND.

MS. WINDHAM: THANK YOU, YOUR HONOR.

THE COURT: YOU MAY PROCEED WITH OPENING STATEMENT.

MS. WINDHAM: THANK YOU.

FOR OVER HALF A CENTURY, CATHOLIC SOCIAL SERVICES HAS SERVED AT-RISK CHILDREN IN PHILADELPHIA THROUGH ITS FOSTER CARE WORK, FINDING THEM LOVING HOMES WHEN THEY HAVE NO PLACE ELSE TO GO. BUT NOW THE CITY IS SEEKING TO END THAT HALF CENTURY OF SERVICE, AND TO DO SO FOR REASONS THAT VIOLATE BOTH PENNSYLVANIA LAW AND THE FIRST AMENDMENT. WE ARE HERE ON A MOTION FOR A TEMPORARY RESTRAINING ORDER OR A PRELIMINARY INJUNCTION BECAUSE THE CITY'S UNLAWFUL ACTIONS ARE CAUSING SERIOUS, URGENT AND ONGOING HARMS.

SEVERAL PROBLEMS REQUIRE URGENT RELIEF, AND I WILL NAME TWO JUST TO START. FIRST, THERE ARE CHILDREN IN THE SYSTEM WHO NEED HOMES TODAY. CATHOLIC HAS PLACES AVAILABLE RIGHT NOW, 26 OF THEM. WE BELIEVE THERE WILL BE 35 OPENINGS BY THE END OF JUNE. BUT THE CITY IS REFUSING TO PLACE CHILDREN THOSE HOMES JUST BECAUSE THOSE FAMILIES WORK WITH CATHOLIC. THOSE CHILDREN COULD LIVE WITH LOVING FOSTER PARENTS LIKE MRS. PAUL, WHOM YOU WILL HEAR FROM TODAY, BUT THE CITY WON'T LET THAT HAPPEN.

SECOND, THE CITY HAS SAID THAT IT WILL MAKE LIMITED EXCEPTIONS TO ITS REFERRAL STOPPAGE, ESSENTIALLY WHEN A REALLY DIFFICULT SITUATION ARISES AND THE RIGHT INFORMATION GETS TO THE RIGHT PEOPLE AT THE RIGHT TIME. BUT EVEN THAT CAN END UP TAKING WEEKS,

WHICH WE HAVE SEEN IN THE CASE OF DOE FOSTER CHILD NUMBER ONE. PLACEMENT TOOK WEEKS THAT NORMALLY COULD HAVE HAPPENED WITHIN A MATTER OF HOURS. SO REAL CHILDREN AND REAL FOSTER PARENTS ARE BEING HURT BY THE CITY'S ACTIONS EVERY DAY THAT THOSE ACTIONS CONTINUE.

THE CITY HAS IMPOSED THESE PENALTIES ON FOSTER FAMILIES AND ON CATHOLIC BECAUSE IT CLAIMS THAT IT CAN, INDEED THAT IT MUST, PENALIZE THE PLAINTIFFS BECAUSE CATHOLIC CANNOT MAKE WRITTEN CERTIFICATIONS THAT CONTRADICT ITS RELIGIOUS BELIEFS. BUT THE SUPREME COURT, THE 3RD CIRCUIT AND THIS COURT HAVE BEEN CLEAR THAT EVEN WHEN GOVERNMENTS ARE EXERCISING DISCRETION, GOVERNMENTS MUST NOT DO SO IN A WAY THAT BURDENS RELIGIOUS EXERCISE, TARGETS, RETALIATES OR COMPELS SPEECH. AND THAT'S ESPECIALLY TRUE WHERE THE CITY DOES NOT HAVE A COMPELLING INTEREST BEHIND ITS ACTIONS. AND IT DOES NOT HAVE ONE HERE, SINCE IN THAT HALF CENTURY OF SERVICE, NOT ONE PERSON HAS COMPLAINED AGAINST CATHOLIC FOR PROVIDING FOSTER CARE SERVICES CONSISTENTLY WITH ITS RELIGIOUS BELIEFS.

IN ITS RESPONSE, THE CITY IS ASKING THIS COURT TO PRESUME THAT TWO THINGS ARE TRUE, TWO THINGS THAT IT HAS NOT EVEN ARGUED MUCH LESS DEMONSTRATED. FIRST, IT'S ASKING THIS COURT TO PRESUME THAT CATHOLIC'S WRITTEN CERTIFICATIONS FOR HOME STUDIES ARE A PUBLIC

ACCOMMODATION. THAT'S SOMETHING THEY HAVE NEVER BEEN UNDERSTOOD TO BE, THAT'S SOMETHING THAT THE CITY HAS NOT EVEN ATTEMPTED TO ESTABLISH THAT THEY ARE.

NUMBER TWO, THE CITY IS ALSO ASKING THIS COURT TO RULE THAT ACTIONS BY PRIVATE RELIGIOUS CHARITIES ARE REALLY CITY ACTIONS. THAT'S CONTRARY TO BOTH LAW AND TO THE PLAIN TERMS WRITTEN INTO THE CITY'S CONTRACT. THUS THE CITY'S DEFENSES FALL APART, AND WHAT IS LEFT IS A GOVERNMENT TARGETING, RETALIATING AND BURDENING RELIGIOUS EXERCISE IN VIOLATION OF THE LAW. WITHOUT URGENT ACTION BY THIS COURT, CATHOLIC WILL SOON BE UNABLE TO CONTINUE ITS DECADES-LONG RELIGIOUS EXERCISE OF SERVING FOSTER CHILDREN CONSISTENTLY WITH ITS FAITH. WITHOUT URGENT ACTION FROM THIS COURT, FOSTER PARENTS LIKE MS. FULTON AND MS. SIMMS-BUSCH WILL LOSE THE CRITICAL SUPPORT SERVICES THAT THEY RELY ON TO SERVE THEIR FOSTER CHILDREN. WITHOUT URGENT ACTION FROM THIS COURT, LOVING FOSTER HOMES LIKE MRS. PAUL'S WILL CONTINUE TO SIT EMPTY DURING A FOSTER CARE CRISIS.

THE PLAINTIFFS MEET THE CRITERIA FOR EMERGENCY AND INJUNCTIVE RELIEF. FIRST, THE PLAINTIFFS HAVE DEMONSTRATED A REASONABLE PROBABILITY OF SUCCESS ON THE MERITS. UNLESS THE COURT HAS A PARTICULAR CLAIM THAT IT WOULD LIKE ME TO TURN TO FIRST, I WILL ADDRESS EACH ONE IN TURN.

FIRST, PLAINTIFFS ARE LIKELY TO PREVAIL ON THEIR CLAIM UNDER THE PENNSYLVANIA RELIGIOUS FREEDOM PROTECTION ACT OR RESPITE. UNDER RESPITE, A PLAINTIFF NEEDS TO SHOW THAT THEY ARE ENGAGED IN RELIGIOUS EXERCISE AND THAT RELIGIOUS EXERCISE IS SUBSTANTIALLY BURDENED. ONCE A PLAINTIFF HAS MADE THAT SHOWING, AND PLAINTIFFS HAVE HERE, THEN THE BURDEN SHIFTS TO THE DEFENDANTS TO SHOW THAT THEY HAVE A COMPELLING INTEREST IN THEIR ACTIONS, AND THAT THEY HAVE USED THE LEAST RESTRICTIVE MEANS AVAILABLE TO FURTHER THAT INTEREST.

WE HAVE EXPLAINED THESE CLAIMS AT LENGTH IN THE BRIEFING, AND SO I WANT TO TOUCH BRIEFLY ON THE CITY'S COUNTER ARGUMENTS. FIRST, THE CITY CLAIMS THAT THE PLAINTIFFS ARE NOT ENGAGED IN RELIGIOUS EXERCISE HERE. I THINK THE BEST PROOF THAT THEY ARE IS THEIR LONG HISTORY. THE ARCHDIOCESE OF PHILADELPHIA HAS BEEN PROVIDING SERVICES FOR AT-RISK CHILDREN FOR OVER A CENTURY. CATHOLIC SOCIAL SERVICES HAS BEEN INVOLVED IN THIS PARTICULAR FORM OF SERVICE TO CHILDREN, FOSTER CARE SERVICE AND PLACEMENTS, FOR A HALF CENTURY.

THE DECLARATION OF BISHOP MCINTYRE DETAILS THE IMPORTANCE OF THIS FUNDAMENTAL RELIGIOUS EXERCISE TO CATHOLIC SOCIAL SERVICES AND TO ITS CATHOLIC FAITH. THIS COURT ALSO RECOGNIZED IN THE CASE OF CHOSEN 300 MINISTRIES IN THE CITY OF PHILADELPHIA THAT ACTS OF

CHARITY ARE OFTEN CENTRAL TO CHRISTIAN WORSHIP. IN THAT CASE, THIS COURT RULED IN FAVOR OF A RELIGIOUS MINISTRY DEDICATED TO FEEDING THE HOMELESS, AND NOT JUST FEEDING THE HOMELESS GENERALLY, BUT DOING IT IN A VERY PARTICULAR WAY, FEEDING THEM DOWNTOWN ON THE PARKWAY AT THE PLACE WHERE THEY ARE. CATHOLIC SOCIAL SERVICES HAS A FUNDAMENTAL RELIGIOUS EXERCISE OF SERVING FOSTER CHILDREN IN A MATTER CONSISTENT WITH CATHOLIC FAITH. THE SAME IS ALSO TRUE FOR THE INDIVIDUAL FOSTER FAMILIES, AND YOU WILL HEAR A LITTLE BIT MORE ABOUT THAT FROM THEM TODAY.

SECOND, THERE ARE FOUR DIFFERENT STATUTORY CRITERIA FOR WHAT CONSTITUTES A SUBSTANTIAL BURDEN UNDER RESPITE. THE PLAINTIFFS HAVE MET ALL FOUR OF THOSE. IT'S ONLY NECESSARY TO MEET ONE IN ORDER TO PROVE A SUBSTANTIAL BURDEN, BUT ALL FOUR ARE MET HERE.

THE CITY'S RESPONSE IS TWOFOLD. FIRST, THE CITY SAYS THAT NO SUBSTANTIAL BURDEN EXISTS BECAUSE CATHOLIC ENTERED INTO A CONTRACT WITH THE CITY AND THEREFORE CANNOT HAVE A SUBSTANTIAL BURDEN. THIS ARGUMENT RESTS ON THE FALLACY THAT CATHOLIC IS A PUBLIC ACCOMMODATION UNDER THE TERMS OF THE CONTRACT. AND I WANT TO POINT THE COURT TO CONTRACT PROVISION 15.1. THIS IS THE NONDISCRIMINATION PROVISION. THAT IS AT ECF DOCUMENT 13-5 AT PAGE 18. THE CITY SAYS, AND IN

PERFORMING -- OR THE CONTRACT SAYS, AND IN PERFORMING THIS CONTRACT, PROVIDERS SHALL NOT DISCRIMINATE OR PERMIT DISCRIMINATION AGAINST ANY INDIVIDUAL BECAUSE OF RACE, COLOR, RELIGION OR NATIONAL ORIGIN, PERIOD.

THEN THERE'S A SECOND SENTENCE, NOR SHALL THE PROVIDER DISCRIMINATE OR PERMIT DISCRIMINATION AGAINST INDIVIDUALS IN EMPLOYMENT, HOUSING AND REAL PROPERTY PRACTICES AND/OR PUBLIC ACCOMMODATION PRACTICES. IT THEN GOES ON TO DEFINE BOTH DISCRIMINATION AND APPLY IT TO A NUMBER OF ADDITIONAL PROTECTED CLASSES, INCLUDING SEXUAL ORIENTATION. AND SO BY PLAIN TERMS OF THE CONTRACT, IT ONLY PROHIBITS ACTIONS THAT THE CITY WOULD TERM DISCRIMINATION AGAINST SEXUAL ORIENTATION IF THEY OCCUR IN THE CONTEXT OF A PUBLIC ACCOMMODATION. WRITTEN CERTIFICATIONS FOR HOME STUDIES ARE NOT A PUBLIC ACCOMMODATION.

FIRST, CATHOLIC SOCIAL SERVICES IS NOT A PLACE OF PUBLIC ACCOMMODATION WITHIN THE MEANING OF THE CITY'S ORDINANCE. IT IS A PRIVATE RELIGIOUS ENTITY. AND IN A PRIOR CASE THE PENNSYLVANIA COMMONWEALTH COURT DETERMINED THAT A RELIGIOUS SCHOOL RUN BY THE ARCHDIOCESE OF PHILADELPHIA WAS NOT A PUBLIC ACCOMMODATION UNDER STATE LAW.

THE SAME IS TRUE HERE, CATHOLIC SOCIAL SERVICES IS NOT A PUBLIC ACCOMMODATION LIKE A HOTEL OR A

RESTAURANT OR A TRAIN STATION. SECOND, WRITTEN CERTIFICATIONS FOR HOME STUDIES ARE NOT A GOOD OR SERVICE THAT IS GENERALLY MADE AVAILABLE TO THE PUBLIC. THEY ARE NOT SOMETHING YOU CAN WALK IN THE DOOR, PAY YOUR MONEY AND SAY, HEY, I HAVE PAID THE PRICE, GIVE ME THAT THING. THEY ARE GOVERNED BY STATE LAW, AND STATE LAW IS CLEAR THAT A NUMBER OF SUBJECTIVE AND DISCRETIONARY CRITERIA GO INTO MAKING THAT DETERMINATION. I AM GOING TO BE LOOKING AT 55 PENNSYLVANIA CODE, SECTION 3700.64. THESE ARE STATE REGULATIONS GOVERNING THE CERTIFICATIONS FOR THE HOME STUDY PROCESS.

THE FACTORS THAT FOSTER CARE AGENCIES MUST CONSIDER INCLUDE STABLE, MENTAL AND EMOTIONAL ADJUSTMENT, INCLUDING IN SOME CASES A PSYCHOLOGICAL EVALUATION. SUPPORTIVE COMMUNITY TIES, EXISTING FAMILY RELATIONSHIPS, ATTITUDES AND EXPECTATIONS, ABILITY OF THE APPLICANT TO WORK IN PARTNERSHIP WITH AN FSCA, A FOSTER CARE AGENCY. AND SO THE DETERMINATIONS INVOLVED IN HOME STUDIES AND IN THE WRITTEN CERTIFICATIONS ARE BY NATURE DISCRETIONARY DETERMINATIONS GOVERNED BY DETAILED STATE REGULATIONS. THEY ARE NOT PUBLIC ACCOMMODATIONS THAT ARE MADE AVAILABLE TO THE GENERAL PUBLIC. YOU DON'T HAVE TO GO THROUGH AN EVALUATION OF SUPPORTIVE COMMUNITY TIES IN ORDER TO RENT A HOTEL ROOM. YOU DON'T

HAVE TO PROVE YOU HAVE STABLE, MENTAL AND EMOTIONAL ADJUSTMENT IN ORDER TO BUY A BUS TICKET. THEY DON'T ASK YOU ABOUT YOUR EXISTING FAMILY RELATIONSHIPS AND ATTITUDES AND EXPECTATIONS TOWARDS CHILDREN WHEN YOU GO TO BUY A TRAIN TICKET. THIS IS NOT A PUBLIC ACCOMODATION WITHIN THE MEANING OF THE CONTRACT.

AND SO THE CITY'S DEFENSE ON THIS POINT FALLS APART. CATHOLIC SOCIAL SERVICES IS SUBSTANTIALLY BURDENED WITHIN THE MEANING OF STATE LAW. THE INDIVIDUAL FOSTER FAMILIES ARE SUBSTANTIALLY BURDENED AS WELL. AND THE CITY MUST PROVE THAT IT HAS A COMPELLING GOVERNMENT INTEREST IN WHAT HAS BEEN DONE HERE, AND THAT IT HAS USED THE LEAST RESTRICTIVE MEANS AVAILABLE TO FURTHER THAT INTEREST.

FIRST, IT'S IMPORTANT TO NOTE THAT WHEN THERE IS A COMPELLING GOVERNMENT INTEREST, THE QUESTION IS NOT, IS THIS INTEREST COMPELLING IN THE BROAD SENSE. THE QUESTION IS, IS THE INTEREST COMPELLING IN THIS PARTICULAR CASE.

IN THE 9-0 SUPREME COURT DECISION OF CHURCH OF LUKUMI BABALU AYE V. CITY OF HIALEAH, THE SUPREME COURT SAID THAT PUBLIC HEALTH WAS NOT A COMPELLING GOVERNMENT INTEREST BECAUSE THE CITY HAD FAILED TO PURSUE IT EVENHANDEDLY. IN THE 9-0 SUPREME COURT DECISION OF HOLT V. HOBBS, THE SUPREME COURT SAID

PRISON SECURITY WAS NOT A COMPELLING GOVERNMENT INTEREST BECAUSE THE CITY HAD FAILED TO BEAR ITS BURDEN OF PROOF THAT WHAT MR. HOBBS WAS DOING WAS ACTUALLY ENDANGERING PRISON SECURITY.

THE CITY HERE SAYS THAT IT HAS A COMPELLING INTEREST IN ITS FAIR PRACTICES ORDINANCE, BUT IT HAS NOT SHOWN THAT THAT COMPELLING INTEREST APPLIES IN THIS PARTICULAR CASE, AND IT HAD A DIFFICULT TIME DOING THAT BECAUSE THERE HAS NOT BEEN A SINGLE COMPLAINT AGAINST CATHOLIC FOR FOLLOWING THEIR RELIGIOUS PRACTICES.

THE STATUTE ALSO REQUIRES THE CITY TO PROVE THAT THE COMPELLING -- THAT THE ACTIONS ACTUALLY FURTHER THE COMPELLING INTEREST. THAT'S SOMETHING ELSE THE CITY CAN'T DO, ESPECIALLY WHEN IT COMES TO THE QUESTION OF THE INDIVIDUAL FOSTER FAMILIES. THE CITY HAS CUT OFF ALL FOSTER CARE REFERRALS TO CATHOLIC. THERE IS NO WAY TO BE ABLE TO PLACE CHILDREN IN THESE HOMES WITHOUT REFERRALS FROM THE CITY. ALL FOSTER CARE REFERRALS FROM PHILADELPHIA CHILDREN COME THROUGH DHS.

AND SO AS A RESULT, MRS. PAUL'S HOME IS CURRENTLY SITTING EMPTY. AS SHE WILL TELL YOU TODAY, IT HAS NEVER SAT EMPTY FOR THIS AMOUNT OF TIME BEFORE. THE CITY IS REFUSING TO PLACE CHILDREN IN THE HOMES OF THESE INDIVIDUAL FAMILIES SIMPLY BECAUSE THEY WORK WITH

CATHOLIC. THE CITY CANNOT HOPE TO PROVE THAT IT HAS -- THAT IT FURTHERS ITS COMPELLING INTEREST TO PENALIZE FAMILIES WHO WERE CERTIFIED LONG AGO. THIS IS NOT RELATED TO THEIR INTEREST IN WHAT HAPPENS WITH HOME STUDIES IN THE FUTURE GOING FORWARD. THEY DON'T HAVE A COMPELLING INTEREST IN WHAT THEY ARE DOING HERE, NOR HAVE THEY USED THE LEAST RESTRICTIVE MEANS AVAILABLE. AGAIN, THE HISTORY, THE LONG HISTORY OF CATHOLIC'S DEDICATED SERVICE TO FOSTER CHILDREN AND FAMILIES WITH NO COMPLAINTS SHOWS THAT THE SYSTEM HAS WORKED AND THE CITY COULD PERMIT THEM TO MAKE REFERRALS. THEY ARE NOT ASKING TO STAND IN ANYONE'S WAY. THEY ARE NOT ASKING TO PREVENT ANYONE FROM BECOMING A FOSTER PARENT. THEY ARE ONLY ASKING FOR THE ABILITY TO MAKE REFERRALS TO AN AGENCY THAT IS A GOOD FIT FOR A COUPLE WHO COMES TO THEM.

THE CITY HAS FAILED TO PROVE THAT THAT IS NOT A LESS-RESTRICTIVE ALTERNATIVE TO MEET THEIR GOALS. THE SAME STRICT SCRUTINY STANDARD APPLIES TO THE PLAINTIFFS' CLAIMS UNDER THE FREE EXERCISE CLAUSE. AND I WANT TO MENTION FOR A MOMENT THE FREE EXERCISE CLAUSE. THE CITY HAS SORT OF MERGED TOGETHER TWO DIFFERENT ANALYSES AND THEY ARE TWO SEPARATE ANALYSES. FIRST, THE 3RD CIRCUIT HAS MADE CLEAR IN THE BLACK HAWK CASE THAT WHERE YOU HAVE A GOVERNMENT SYSTEM THAT CREATES A REGIME

OF INDIVIDUALIZED DISCRETIONARY EXEMPTIONS, STRICT SCRUTINY APPLIES. THAT'S FROM BLACKHAWK V. PENNSYLVANIA, 381 F.3D AT 209. SO THE MERE PRESENCE OF A REGIME OF INDIVIDUALIZED DISCRETIONARY EXEMPTIONS WHERE RELIGIOUS EXEMPTION HAS BEEN DENIED IS SUBJECT TO SCRUTINY BECAUSE IT IS NOT A NEUTRAL LAW OF GENERAL APPLICABILITY, SO THE RATIONAL-BASIS TEST DOES NOT APPLY, IT GOES TO THE STRICT SCRUTINY TEST.

HERE, THAT'S EXACTLY WHAT THE CITY HAS IN PLACE. AND I WOULD POINT YOU TOWARD CONTRACT PROVISION SECTION 3.21. THAT'S ECF 13-4, AT PAGES 14 THROUGH 15. THIS IS WHAT THE CITY TERMS THE NON-REFERRAL PROVISION. THE PROVIDER SHALL NOT REJECT A CHILD OR FAMILY FOR SERVICES BASED UPON THE LOCATION OR THE CONDITION OF THE FAMILY'S RESIDENCE. I WANT TO ADDRESS THAT IN A MOMENT. AND THEN AT THE END, UNLESS AN EXCEPTION IS GRANTED BY THE COMMISSIONER OR THE COMMISSIONER'S DESIGNEE IN HIS OR HER SOLE DISCRETION.

SO THE CITY HAS A SYSTEM OF INDIVIDUALIZED AND DISCRETIONARY EXEMPTIONS FROM THIS CONTRACT PROVISION. AND THE CITY HAS MADE CLEAR IN ITS MAY 7TH LETTER FROM THE LAW DEPARTMENT TO CATHOLIC THAT IT WOULD NOT MAKE AN EXCEPTION FOR CATHOLIC IN THESE CIRCUMSTANCES. THOSE TWO FACTS STANDING ALONE ARE ENOUGH TO SUBJECT THE CITY'S ACTIONS TO STRICT SCRUTINY.

I DO WANT TO JUST NOTE FOR A MOMENT, THE CITY CLAIMS THAT THIS PROVISION OF THE CONTRACT IS A FLAT BAN BECAUSE IT ASSUMES THAT IT'S TALKING ABOUT HOME STUDIES. THAT DOES NOT APPEAR TO BE THE CASE. IT APPEARS TO BE TALKING ABOUT CHILDREN AND FAMILIES WHO ARE REFERRED FOR FOSTER SERVICE, NOT FOR HOME STUDIES. I NOTE THE LANGUAGE THERE SAYS YOU CAN'T REJECT THEM BASED UPON THE LOCATION OR CONDITION OF THE FAMILY'S RESIDENCE.

55 PENNSYLVANIA CODE SECTION 3700.66 ACTUALLY HAS A WHOLE LIST OF REQUIREMENTS ABOUT THE CONDITION OF THE FAMILY'S RESIDENCE THAT YOU CONSIDER AS PART OF THE HOME STUDY. AND SO GIVEN THAT THE LANGUAGE IN THIS CONTACT PROVISION SEEMS TO BE IN CONFLICT WITH THE STATE REGULATIONS, I BELIEVE THAT THE BEST READING OF THIS CONTRACT PROVISION IS THAT IT'S NOT TALKING ABOUT HOME STUDIES AT ALL. AND THIS IS WHAT THE CITY IS USING TO ARGUE THAT CATHOLIC SOCIAL SERVICES IS COMPELLED TO PERFORM THESE HOME STUDIES PURSUANT TO THE CONTRACT.

GIVEN THAT THERE IS A SYSTEM OF INDIVIDUALIZED AND DISCRETIONARY EXEMPTION, STRICT SCRUTINY APPLIES. AS I HAVE DISCUSSED, THE CITY CANNOT HOPE TO MEET IT. SECOND, THE CITY'S ACTIONS HAVE NOT BEEN NEUTRAL. THE CITY HAS MADE A NUMBER OF EXCEPTIONS

TO ITS SUPPOSED REFERRAL BAN FOR SECULAR REASONS, AND WE WILL HEAR A LITTLE BIT MORE ABOUT THAT THROUGH EVIDENCE TODAY.

FINALLY, UNDER THE FREE EXERCISE CLAUSE, I JUST WANT TO BRIEFLY NOTE THE SUPREME COURT'S RECENT DECISION IN MASTERPIECE CAKESHOP. THE SUPREME COURT IN THAT CASE MADE CLEAR THAT THERE ARE DIFFICULT ISSUES ON BOTH SIDES OF THESE QUESTIONS, AND THAT THE FREE EXERCISE CLAUSE DOES NOT DISAPPEAR WHEN THESE DIFFICULT QUESTIONS COME UP. THE SUPREME COURT RECOGNIZED THAT GOVERNMENTS -- AND THAT THE COURTS MUST STRIKE THE BALANCE. BUT THE GOVERNMENT WHEN THEY ARE CONSIDERING QUESTIONS OF RELIGIOUS EXEMPTION MUST TAKE THOSE QUESTIONS SERIOUSLY AND CANNOT DENIGRATE AND REFUSE TO ACCEPT RELIGIOUS EXERCISE AND SINCERE RELIGIOUS OBJECTIONS OUT OF HAND.

HERE, THE CITY COUNSEL HAS TARGETED CATHOLIC IN ITS RESOLUTION. THE LAW DEPARTMENT HAS MADE CLEAR THAT -- THE DEPARTMENT OF HUMAN SERVICES THROUGH THE LAW DEPARTMENT HAS MADE CLEAR THAT IT WILL NOT GRANT ANY EXCEPTIONS AND COMPARE CATHOLIC'S ACTIONS TO RACE DISCRIMINATION. THE HUMAN RELATIONS COMMISSION STATED IN ITS LETTER THAT IT WAS ACTING AT THE BEHEST OF THE MAYOR. AND THE MAYOR, I WILL LET HIM SPEAK IN HIS OWN WORDS, CHAPUT'S ACTIONS ARE NOT CHRISTIAN. THE ARCH

DON'T CARE ABOUT PEOPLE, IT'S ABOUT IMAGE AND MONEY. POPE FRANCIS NEEDS TO COME KICK SOME ASS HERE. I COULD CARE LESS ABOUT THE PEOPLE AT THE ARCHDIOCESE.

THESE ARE STATEMENTS FROM THE MAYOR'S TWITTER FEED. THEY WERE REPORTED IN THE NEWS ARTICLES WE HAVE CITED ECF 13-7 AT 18 THROUGH 25 IN THE NEWS ARTICLES AS THEY ARE REPRODUCED THERE. WHERE CITY HAS ENGAGED IN DENIGRATION OF RELIGIOUS BELIEFS AND THEN TAKEN ACTIONS THAT HAVE PENALIZED RELIGIOUS BELIEVERS AND DEMONSTRATED THAT IT IS NOT WILLING TO GIVE DUE CONSIDERATION TO THEIR FREE EXERCISE RIGHT. THE FREE EXERCISE CLAUSE HAS BEEN VIOLATED UNDER MASTERPIECE.

THE COURT: AND YOU ARE SAYING THAT THE STATEMENTS OF THE MAYOR DID DENIGRATE AND THEREFORE IS IN VIOLATION?

MS. WINDHAM: YOUR HONOR, I AM SAYING THESE STATEMENTS OF THE MAYOR ARE PROOF THAT THE CITY'S ACTIONS WERE TAKEN TO TARGET CATHOLIC FOR ITS RELIGIOUS BELIEFS.

I WANT TO TOUCH BRIEFLY ON CATHOLIC'S -- THE PLAINTIFFS' FREE SPEECH CLAIMS. FIRST, THE CITY HAS ENGAGED IN RETALIATION UNDER THE FREE SPEECH CLAUSE. THEY DON'T DENY THAT CATHOLIC WAS SPEAKING ON A MATTER OF PUBLIC CONCERN. THEY DO QUESTION WHETHER THE RETALIATORY CONDUCT WAS RESPONSE TO PROTECTED ACTIVITY.

AS I UNDERSTAND THEIR ARGUMENT, THEY ARE SAYING NO, NO, NO, THIS IS NOT BECAUSE OF YOUR STATEMENT ABOUT MARRIAGE, THIS IS ABOUT YOUR STATEMENT -- BECAUSE OF YOUR STATEMENTS ABOUT THE CONTRACT.

AS I HAVE ALREADY EXPLAINED, I DON'T BELIEVE THAT THE CONTRACT ACTUALLY PROHIBITS WHAT CATHOLIC SOCIAL SERVICES SAID IT WOULD DO. BUT SECOND, I WOULD ALSO NOTE THAT WHEN IT COMES TO RETALIATORY CONDUCT, I WOULD POINT THE COURT TO THE DECLARATION OF JAMES BLACK AND THE DECLARATION OF DOE FOSTER MOTHER NUMBER ONE WHERE THEY WERE INFORMED THAT A DENIAL OF A REFERRAL IN URGENT CIRCUMSTANCES WAS MADE DUE TO THE CASE WITH CSS. THIS SHOWS RETALIATORY CONDUCT FOR CATHOLIC COMING BEFORE THIS COURT AND FILING A LAWSUIT TO PROTECT ITS CIVIL RIGHTS. THAT IS RETALIATORY CONDUCT IN VIOLATION OF THE FREE SPEECH CLAUSE.

FINALLY, DEFENDANTS ARE CONDITIONING GOVERNMENT CONTRACTS ON COMPELLED SPEECH. AND THEY ARE CONDITIONING SPEECH THAT FALLS OUTSIDE THE SERVICES THAT IT COMPENSATES CATHOLIC FOR PROVIDING. THE VALAQUES CASE, THE A.O.C. CASE BEFORE THE SUPREME COURT AND THE CRADLE OF LIBERTY CASE BEFORE THIS COURT DEMONSTRATE THAT THE CITY CANNOT EVEN IN THE AREA OF GOVERNMENT CONTRACTING USE GOVERNMENT CONTRACTS AS A VEHICLE TO REACH OUT AND RESTRICT SPEECH. IT CANNOT DO INDIRECTLY

WHAT IT IS CONSTITUTIONALLY PROHIBITED FROM DOING DIRECTLY.

HERE WITH REGARD TO HOME STUDIES, THE CITY DOES NOT COMPENSATE CATHOLIC, NOT ONE PENNY FOR HOME STUDIES THAT ARE PERFORMED. THE CITY ONLY COMPENSATES CATHOLIC AFTER A PLACEMENT HAS BEEN MADE IN A FAMILY, AND FOR EACH DAY THAT THAT CHILD IS PLACED WITH THAT FAMILY THEY RECEIVE COMPENSATION. AND SO THE CITY IS REACHING OUT BEYOND THE ACTIVITIES THAT IT IS FUNDING TO REACH OUT AND GRAB OTHER ACTIVITIES AND OTHER SPEECH BY THE PLAINTIFFS.

SECOND, I WOULD NOTE THAT WITH REGARD TO THESE ACTIONS, A REFERRAL FOR A FAMILY TO SAY THIS OTHER AGENCY WOULD BE A BETTER FIT FOR YOU, THAT IS CONDUCT THE CITY IS DEFINITELY NOT FUNDING. THERE IS NOT ONE PENNY THAT IS GOING TO BE PAID FOR SOMEONE WHO IS MAKING A REFERRAL IN THE HOME STUDY CONTEXT. AND SO THE CITY'S ACTIONS ARE ATTEMPTING TO COMPEL SPEECH OUTSIDE OF THE CONTRACT. FOR ALL OF THOSE REASONS, THE CITY HAS VIOLATED THE FIRST AMENDMENT, HAS VIOLATED THE FREE SPEECH CLAUSE, THE FREE EXERCISE CLAUSE, AND THE PENNSYLVANIA RELIGIOUS FREEDOM PROTECTION ACT.

THE PLAINTIFFS HAVE ALSO SHOWN THAT THEY MEET THE RESPITE TEST. THEY WILL BE IRREPARABLY HARMED. THEY ARE ALREADY BEING IRREPARABLY HARMED ABSENT AN

INJUNCTION. THE CITY CONCEDES THAT THEIR FIRST AMENDMENT RIGHTS ARE AT STAKE HERE. IRREPARABLE HARM IF THOSE WERE PROVEN IS TAKING PLACE. SECOND, AN INJUNCTION IS IN THE PUBLIC INTEREST. THE CITY OFFERS PUBLIC INTEREST ARGUMENTS, BUT THAT ARGUMENT IS ENTIRELY CIRCULAR. IT SAYS THAT CHILDREN HAVE AN INTEREST IN -- THE CHILDREN SHOULD NOT BE PLACED WITH CATHOLIC SOCIAL SERVICES BECAUSE IT HAD DECIDED TO SHUT DOWN CATHOLIC SOCIAL SERVICES AND SO IT IS NOT IN THE BEST INTEREST OF CHILDREN TO PLACE WITH AN AGENCY IT HAS DECIDED TO SHUT DOWN. THIS ARGUMENT IS ENTIRELY CIRCULAR AND DOES NOT GET TO THE ULTIMATE QUESTION OF CATHOLIC SOCIAL SERVICES AND ITS EXCELLENT SERVICES FOR CHILDREN. THE BEST INTEREST OF CHILDREN IS NOT A MAGICAL PHRASE THE CITY CAN INVOKE ANY TIME IT NEEDS TO JUSTIFY SOMETHING.

IT'S A TERM THAT HAS MEANING, IT'S A TERM WITH MEANING THAT IN PART DEFINED BY STATE LAW WHICH DEFINES IT IN PART, AND I AM GOING TO BE PUTTING PENNSYLVANIA STATUTE SECTION 2633, PARAGRAPH 4. THE ABILITY TO LIVE IN THE LEAST RESTRICTIVE, MOST FAMILY-LIKE SETTING THAT IS SAFE, HEALTHY AND COMFORTABLE AND MEETS THE CHILD'S NEEDS. THERE ARE 35 OF THOSE OPTIONS AVAILABLE IN FAMILY-LIKE SETTINGS OR WILL BE AVAILABLE BY THE END OF JUNE, AT LEAST 26 THAT ARE AVAILABLE TODAY. AND THE CITY IS REFUSING TO PLACE

CHILDREN IN THOSE HOMES BECAUSE OF ITS DISAGREEMENT WITH CATHOLIC. THIS IS NOT IN THE CHILDREN'S BEST INTEREST. FOR THE SAME REASONS THE BALANCE OF THE EQUITIES FAVORS THE PLAINTIFFS, IT IS IN THE BEST INTEREST OF CHILDREN TO BE PLACED IN THESE HOMES. IT IS ALSO IN THE BEST INTEREST OF THE PUBLIC TO VINDICATE FIRST AMENDMENT RIGHTS.

FOR ALL OF THESE REASONS, WE BELIEVE THAT THE PRELIMINARY INJUNCTION AND/OR TEMPORARY RESTRAINING ORDER SHOULD BE GRANTED.

THE COURT: OKAY, THANK YOU.

MS. EWING: GOOD AFTERNOON, YOUR HONOR.

THE COURT: GOOD AFTERNOON.

MS. EWING: COUNSEL FOR CSS HAS STATED THAT THERE ARE SERIOUS, URGENT AND ONGOING HARMS WITH RESPECT TO THE CHILD WELFARE SYSTEM BECAUSE OF THE ACTIONS WHICH DHS AND THE CITY HAVE TAKEN TO ENFORCE THE CONTRACT FOR FOSTER CARE SERVICES WITH CSS. YOU WILL HEAR TESTIMONY TODAY FROM THE HIGHEST OFFICIALS AT DHS THAT THERE IS NO CRISIS WITH RESPECT TO PLACING CHILDREN. THERE IS NO RIGHT OF ANY GIVEN FOSTER AGENCY, FIRST OF ALL, TO A CONTRACT WITH THE CITY, AND SECONDLY, FOR THE CITY TO FILL ANY AVAILABLE HOME WHEN IT -- WHEN THERE IS A PROBLEM WITH THE UNDERLYING CONTRACT. BUT THERE ARE NO CHILDREN WHO ARE NOT BEING PLACED. THERE

ARE NO CHILDREN WHO ARE NOT BEING PLACED APPROPRIATELY.

THE OTHER HARM WHICH I BELIEVE I HEARD WAS AN ALLEGATION THAT INDIVIDUAL CARE DECISIONS ABOUT CHILDREN ARE BEING HINDERED BECAUSE OF THE CONTRACT DISPUTE. AGAIN, YOU WILL HEAR FROM THE HIGHEST OFFICIALS AT DHS THAT THEY HAVE SPECIFICALLY MADE CLEAR TO CATHOLIC SOCIAL SERVICES THAT THEY THEMSELVES ARE AVAILABLE TO MAKE DECISIONS QUICKLY AS LONG AS THEY HAVE THE APPROPRIATE INFORMATION AS TO WHETHER AN EXCEPTION SHOULD BE MADE. AND THE TYPES OF EXCEPTIONS THAT HAVE BEEN MADE HAVE BEEN THINGS LIKE IF A CHILD -- A SIBLING IS IN FOSTER CARE AND THE OTHER SIBLINGS ARE ALREADY IN A CATHOLIC SOCIAL SERVICES HOME, THEN THE NEW SIBLING WILL BE PLACED IN THAT HOME. THERE YOU WILL SEE AND THE PARTIES HAVE BRIEFED A SPECIFIC INSTANCE IN WHICH CATHOLIC SOCIAL SERVICES HAS SAID THAT THERE WERE ISSUES WHICH SHOULD HAVE BEEN RESOLVED MORE QUICKLY.

WE BELIEVE, IN FACT, THAT ENTANGLING THEM IN THE LITIGATION AND TAKING THEM OUT OF THE SYSTEM, THE FAMILY COURT SYSTEM, AND THE INSTANT COMMUNICATION AND EASY COMMUNICATION THAT NEEDS TO BE MADE IN ORDER TO DETERMINE WHAT THE BEST INTEREST OF ANY GIVEN CHILD IS THAT IT -- THAT MAKING A DECISION SUBJECT TO THIS LITIGATION ACTUALLY HINDERED RESOLUTION AND CAN'T BE ALLOWED TO CONTINUE.

BUT I WOULD LIKE TO MOVE AND COMMENT A LITTLE BIT ON THE MERITS. YOU WILL ALSO BE HEARING SOME TESTIMONY, AND SO I ASSUME WE WILL BE ARGUING IN CLOSING SOME OF THE SAME THINGS. BUT THIS IS -- THERE CERTAINLY IS NO REASON FOR A -- THAT HAS BEEN PROVIDED FOR A TEMPORARY RESTRAINING ORDER IN THIS CASE. THERE IS NO URGENCY, THERE IS NO SERIOUS HARM, THE CHILDREN ARE OKAY. AND CATHOLIC SOCIAL SERVICES ACTED ACCORDINGLY IN WAITING TWO MONTHS BETWEEN WHEN THE INTAKE WAS CLOSED AND WHEN IT BROUGHT THIS MOTION. BUT IT IS -- MOVING TO THE PRELIMINARY INJUNCTION, IT IS -- THE REMEDY IS AN EXTRAORDINARY ONE AND IT'S CATHOLIC SOCIAL SERVICES' BURDEN TO ESTABLISH THE LIKELIHOOD THAT IT WILL SUCCEED ON DEMONSTRATING SUBSTANTIAL BURDEN ON ITS RELIGIOUS FREEDOM AND FREE EXERCISE CLAIMS, IRREPARABLE HARM, THE BALANCE OF EQUITIES AND THE PUBLIC POLICY CONSIDERATIONS. WE BELIEVE, YOUR HONOR, THAT YOU WILL FIND THAT NONE OF THESE FACTORS HAVE BEEN MET IN THIS INSTANCE.

THE UNIQUE FACTOR IN THE CASE BEFORE THIS COURT, AND ONE WHICH CATHOLIC SOCIAL SERVICES HAS NOT REALLY COME TO GRIPS WITH, IS THAT IT INVOLVES A WRITTEN CONTRACT FOR SERVICES WHICH THE CITY IS CHARGED BY THE COMMONWEALTH TO ITSELF PROVIDE AND WHICH IT IS DELEGATING TO CONTRACTORS WHO ENTER INTO AGREEMENTS,

WRITTEN AGREEMENTS, TO PERFORM SERVICES AND BE PAID WITH TAXPAYER DOLLARS. THIS DISTINGUISHES THE CASE AT HAND FROM MOST OF ALL OF THE OTHER CASES THAT YOU WILL HEAR ABOUT AND HAVE BEEN WRITTEN ABOUT IN THIS ACTION.

A WRITTEN CONTRACT IS AN AGREEMENT BETWEEN THE PARTIES WHERE THEY UNDERTAKE TO DO WHAT THEY SAY THEY ARE GOING TO DO. AND IN THIS INSTANCE, THE CSS AGREED THAT IT WILL APPLY THE CRITERIA WHICH THE COMMONWEALTH PROVIDES FOR EVALUATING FOSTER FAMILIES AND FOR CERTIFYING THOSE FAMILIES, AND NONE OF WHICH HAVE ANY RELIGIOUS COMPONENT TO THEM. SINCE THIS IS WORK THAT THE CITY ITSELF IS CHARGED WITH DOING AND HAS DELEGATED, THE CITY CERTAINLY COULD NOT BE APPLYING RELIGIOUS CONSIDERATIONS TO DECIDING ON WHO WOULD BE A GOOD FOSTER PARENT. AND OUR POSITION IS THAT OUR CONTRACTORS CAN -- WE CANNOT ALLOW OUR CONTRACTORS TO BE DOING THAT WHEN THEY PERFORM THAT. IN EFFECT, CSS HAS ENTERED INTO A CONTRACT WITH THE CITY AND WANTS TO CHANGE A TERM OF THAT CONTRACT UNILATERALLY TO PERMIT IT TO ADD RELIGIOUS CRITERIA.

SO THAT IS AN IMPORTANT -- A CRITICAL DIFFERENCE IN OUR CASE. AND WITH THAT IN MIND, I WOULD LIKE TO DEAL A LITTLE BIT UP FRONT WITH THE RELIGIOUS LIBERTY CLAIMS. CSS IS CLAIMING THAT OUR REQUIREMENT THAT IT DEAL WITH SINGLE SEX COUPLES THE SAME WAY THAT

IT DEALS WITH ALL OTHER FOSTER PARENT APPLICANTS AND TO APPLY THE COMMONWEALTH'S SECULAR CRITERIA SOMEHOW INTERFERES WITH THEIR FREE EXERCISE OF RELIGION UNDER THE FIRST AMENDMENT. THE STARTING POINT FOR FREE EXERCISE ANALYSIS IS THE SMITH VERSUS OREGON UNEMPLOYMENT BUREAU CASE WHICH HOLDS THAT THERE IS NO FREE EXERCISE VIOLATION FROM THE APPLICATION OF A VALID NEUTRAL LAW OF GENERAL APPLICATION SO LONG AS THE LAW PASSES RATIONAL BASIS SCRUTINY. OUR FAIR PRACTICES ORDINANCE, WHICH WE DISAGREE WITH CSS AS TO WHETHER IT IS APPLICABLE TO CATHOLIC SOCIAL SERVICES IN THIS -- IN THE CONTRACT AND THE CONTRACT IS PART OF THE RECORD BEFORE YOUR HONOR. BUT IT IS OBVIOUSLY SUCH A VALID NEUTRAL AND GENERALLY APPLICABLE LAW. AND THESE -- THIS IS THE TYPE OF LAW, THE ANTIDISCRIMINATION LAWS WHICH JUSTICE KENNEDY IN THE MASTERPIECE BAKESHOP DECISION, HE DESCRIBES THE GENERAL RULE THAT RELIGIOUS AND PHILOSOPHICAL OBJECTIONS TO GAY MARRIAGE DO NOT ALLOW BUSINESSES, AND CSS FOR ALL OF ITS MISSION IS ALSO A BUSINESS, TO DENY PROTECTED PERSONS EQUAL ACCESS TO GOODS AND SERVICES UNDER A NEUTRAL GENERALLY APPLICABLE LAW -- ANTIDISCRIMINATION PUBLIC ACCOMMODATIONS LAW.

SO TO AVOID THE APPLICATION OF THE SMITH CASE, CSS MUST CONVINCE THIS COURT THAT THERE IS SOME EXCEPTION, EITHER IN THE CASE LAW WHICH HAS FOLLOWED

SMITH OR IN STATUTES, SUCH AS THE PENNSYLVANIA RELIGIOUS FREEDOM ACT, TO WHICH CSS REFERRED. THIS STATUTE PROVIDES FOR STRICT SCRUTINY, BUT ONLY FOR CLAIMS WHICH MEET THE REQUIREMENT OF THE STATUTE. AND THE MAJOR REQUIREMENT IN ANY FREE EXERCISE CLAIM, WHETHER CASE LAW OR STATUTORY, IS THE DEMONSTRATION OF A SUBSTANTIAL BURDEN ON SOME RELIGIOUS PRACTICE.

SO UNDER THE -- SO CSS HAS TO DEMONSTRATE A SUBSTANTIAL BURDEN. AND AT LEAST ITS PAPERS HAVE NOT BEEN CLEAR AS TO HOW ITS -- THE CHURCHES ACKNOWLEDGED SINCERELY HELD RELIGIOUS BELIEFS REGARDING GAY MARRIAGE AND SINGLE SEX COUPLES TRANSLATES OR AFFECTS OR BURDENS OR HAS ANYTHING TO DO WITH THE JOB THAT IT UNDERTAKES TO DO FOR THE CITY, WHICH IS TO EVALUATE FAMILIES AND TO REPORT AS TO WHETHER OR NOT THEY CAN PROVIDE A NURTURING AND SECURE AND SAFE HOME FOR A FOSTER CHILD.

WHAT WE HAVE A RIGHT TO EXPECT UNDER THE CONTRACT AND WHAT WE HAVE ASKED IS THAT WHEN CATHOLIC SOCIAL SERVICES PERFORMS THE WORK OF RECRUITING AND CERTIFYING FOSTER PARENTS FOR US, IF IT IS UNDERTAKEN UNDER THE CONTRACT, THAT IT NOT TURN AWAY ANY COUPLES WHO COME TO IT AND THAT IT PROVIDES THEM WITH AN EVALUATION UNDER THE SECULAR CRITERIA THAT ARE SET FORTH BY THE COMMONWEALTH, NONE OF WHICH RELATES TO RELIGION AND CERTAINLY NONE OF THEM WHICH WOULD DISQUALIFY ANY

APPLICANT ON THE BASIS OF SEXUAL ORIENTATION.

SO I WOULD ALSO LIKE TO BRING THE COURT'S ATTENTION TO A RECENT 6TH CIRCUIT CASE THAT PROVIDES SOME ILLUMINATION ON WHEN A PARTY CLAIMS THE SUBSTANTIAL BURDEN IN COMPLYING WITH A GENERALLY APPLICABLE ANTIDISCRIMINATION LAW ON RELIGIOUS GROUNDS. AND THAT CASE IS -- WE HAVE CITED I THINK IN OUR PAPERS EEOC VERSUS HARRIS FUNERAL HOME, 884 F.3D, 560. AND IN THAT CASE A FUNERAL DIRECTOR CLAIMED THAT TITLE SEVEN IMPOSED A SUBSTANTIAL BURDEN UNDER SIMILAR RELIGIOUS FREEDOM PROTECTION ACT ON HIS RELIGIOUS MINISTRY OF WORKING WITH BEREAVED FAMILIES. AND HE SAID THIS WAS TRUE, THIS WAS THE CASE BECAUSE HE HAD AN ASSISTANT WHOM HE FIRED BECAUSE SHE WAS TRANSGENDER AND TRANSITIONING FROM MALE TO FEMALE. HE CLAIMED THAT THIS WOULD -- THAT IF HE RETAINED THE EMPLOYEE, THIS WOULD CONSTITUTE AN ENDORSEMENT OR SUPPORT OF HER TRANSGENDER STATUS AND THAT THAT WOULD BE AGAINST HIS RELIGIOUS CONVICTIONS.

THE 6TH CIRCUIT FOUND THAT IT WAS ENTITLED TO LOOK AT HOW EXACTLY -- WHAT EXACTLY THE REQUIREMENT OF THE STATUTE HAD TO DO WITH THE RELIGIOUS BELIEF. AND THAT BARE COMPLIANCE WITH TITLE SEVEN DID NOT CONSTITUTE AN ENDORSEMENT, AND THEREFORE THAT THE EMPLOYER WAS REQUIRED TO COMPLY WITH THE TITLE SEVEN REQUIREMENT.

SO ACCORDINGLY, THIS COURT CAN FIND THAT SIMPLE COMPLIANCE WITH THE CITY'S ANTIDISCRIMINATION REQUIREMENT DOES NOT ENDORSE GAY MARRIAGE AND IS NOT A SUBSTANTIAL BURDEN ON A SINCERELY HELD RELIGIOUS BELIEF THAT GAY MARRIAGE MAY VIOLATE TENETS OF THE CATHOLIC CHURCH.

BUT WE DEFINITELY DISAGREE WITH CSS AS FAR AS WHETHER EVEN IF STRICT SCRUTINY WOULD APPLY THAT WE WOULD NOT PASS THE TEST. THERE ARE MANY CASES THAT FIND THAT ANTIDISCRIMINATION LAWS ARE A PRECISE METHOD OF ACHIEVING A COMPELLING GOVERNMENTAL INTEREST IN PREVENTING DISCRIMINATION TO GROUPS OF PEOPLE, TO PROTECTED CLASSES. AND SO IN THAT FUNERAL HOME CASE, THE COURT FOUND THAT EVEN IF THERE HAD BEEN A SUBSTANTIAL BURDEN THAT STRICT SCRUTINY WAS STILL SATISFIED BECAUSE TITLE SEVEN WAS -- BECAUSE TITLE SEVEN THEN WOULD PREVAIL.

NOW, JUST A FEW WORDS ON SOME OF THE OTHER EXCEPTIONS THAT CSS RAISED BEFORE YOUR HONOR THIS MORNING, ARGUING THAT THERE WAS TARGETING UNDER THE TERMS OF MASTERPIECE CAKESHOP, AND REFERRING TO SOME TWEETS OF THE MAYOR WHICH WERE A LONG TIME AGO, BY THE WAY, AND HAD NOTHING DO WITH THIS CONTRACT SITUATION. AND IN THE MEANTIME, THE CITY AND CSS HAVE SINCE SUCCESSFULLY NEGOTIATING A HOST OF OTHER CONTRACTS,

INCLUDING RENEWALS OF MANY CONTRACTS, BUT NOT THIS FOSTER CARE ONE. SO THIS IS HARDLY INDICATIVE OF SOME SORT OF ANIMUS AGAINST CATHOLIC SOCIAL SERVICES. MASTERPIECE CAKESHOP ALSO WAS DECIDED ON THE BASIS THAT THESE COMMENTS, WHICH WERE A LOT MORE -- SOMETHING LIKE CALLING THE BAKER IN THAT CASE DESPICABLE FOR HOLDING THE VIEWS THAT HE DID. THAT THESE WERE HELD BY PEOPLE WHO WERE SUPPOSED TO BE THE NEUTRAL ADJUDICATORS FROM THE CIVIL RIGHTS COMMISSION AND, YOU KNOW, IT'S HARDLY THAT IF PARTIES HAVE A CONTRACT DISAGREEMENT AND CANNOT AGREE ON WHAT THE CONTRACT MEANS AND WHETHER IT'S BEING MET, THAT THEY ARE NOT ALLOWED TO DESCRIBE THAT IN RESPECTFUL TERMS.

SIMILARLY, THERE IS NO SELECTIVE ENFORCEMENT HERE. TWO CONTRACTORS, CATHOLIC SOCIAL SERVICES AND ANOTHER CONTRACTOR, TOLD THE CITY IN NO UNCERTAIN TERMS THAT THEY WOULD NOT SERVE SINGLE SEX FAMILIES AND THEY WOULD NOT PERFORM CERTIFICATIONS OF THEM TO BE FOSTER PARENTS. THE OTHER -- THE CITY HAS ABOUT 28 OTHER CONTRACTS WITH OTHER AGENCIES FOR FOSTER CARE SERVICES AND IT -- NONE OF THESE AGENCIES HAD ANY PROBLEM WITH -- OF THE SAME TYPE. THE OTHER CONTRACTOR, IN FACT, HAS WITHDRAWN FROM THE POSITION THAT IT INITIALLY ARTICULATED AND IS IN THE PROCESS OF NEGOTIATING A COMPLIANCE PLAN AND A NEW CONTRACT AND

HAVING ITS INTAKE RESTORED.

THE EXEMPTION CASES ALSO DO NOT APPLY. THERE IS A LOT OF -- IF YOU LOOK AT PARTICULARLY AT THE 3RD CIRCUIT'S DECISION IN THE FOP VERSUS CITY OF NEWARK CASE, IT GIVES A GOOD BASIS OF ANALYSIS AS TO WHAT KIND OF EXEMPTIONS ARE RELEVANT ONES, AND THEY ARE ONES THAT YOU HAVE TO IDENTIFY THE CORRECT POLICY AND THEN YOU HAVE TO DECIDE WHETHER AN EXCEPTION IS OF THE SAME TYPE DIRECTED TO FURTHERING THAT POLICY OR WHETHER IT'S SOMETHING, IT'S APPLES AND ORANGES. AND WE MAINTAIN THAT IN THIS CASE, FIRST OF ALL THE POLICY IS THE -- WHETHER OR NOT ANY EXEMPTIONS ARE BEING GIVEN TO ALLOW DISCRIMINATION, AND THE ANSWER IS NO, EMPHATICALLY. AND EVEN THE EXEMPTIONS THAT CATHOLIC SOCIAL SERVICES TALKS ABOUT ALLOWING YOU TO REFER FOR GEOGRAPHIC CONVENIENCE AND SUCH ARE FOR THE BEST INTEREST OF THE CHILDREN WHEREAS GIVING AN EXEMPTION TO DISCRIMINATE IS NOT.

SO ANOTHER LINE OF CASES THEY RELY ON ARE PUBLIC BENEFIT CASES. YOU CANNOT DENY A PUBLIC BENEFIT TO AN APPLICANT SIMPLY BECAUSE THEY ARE RELIGIOUS, BUT A STATE CONTRACT OR A CITY CONTRACT FOR SERVICES, GOVERNMENT SERVICES IS NOT A PUBLIC BENEFIT. THE TEEN RANCH CASE THAT WE CITE IN OUR BRIEF HOLDS SQUARELY TO THAT EFFECT.

AS FAR AS SPEECH, THERE IS NO EVIDENCE TO

SUPPORT A FIRST AMENDMENT RETALIATION CLAIM AGAINST THE EVIDENCE THAT YOU WILL HEAR AND THAT YOU HAVE SEEN IN YOUR -- IN THE AFFIDAVITS MERELY TALKS ABOUT A CONTRACT DISPUTE, A REGRETFUL CONTRACT DISPUTE BECAUSE WE VALUE THE SERVICES THAT CATHOLIC SOCIAL SERVICES HAS PROVIDED. BUT WE CANNOT ALLOW RELIGIOUS EXEMPTIONS TO OUR -- YOU KNOW, WHEN THIS IS OUR JOB, OUR WORK, DHS'S WORK AND THE CITY CANNOT PICK AND CHOOSE AND FAVOR ONE RELIGION OVER ANOTHER.

AND THERE CERTAINLY IS NO COMPELLED SPEECH. ANY SPEECH THAT IS BEING REQUIRED IS WITHIN THE TERMS OF THE CONTRACT. SO I ASSUME THAT WE WILL ARGUE A BIT AT THE END, BUT CSS WILL NOT -- HAS NOT BEEN ABLE TO -- OR WILL NOT BE ABLE TO PREVAIL ON THE MERITS PART OF ITS ARGUMENT. IT CAN ONLY ASSERT ITS OWN VIOLATIONS OF CIVIL RIGHTS, NOT DERIVATIVE ONES SO AS TO -- IT CANNOT BRING THE CLAIMS OF FOSTER PARENTS AND FOSTER PARENTS CANNOT CLAIM CIVIL RIGHTS VIOLATIONS AS A RESULT OF ANY VIOLATION OR ALLEGED VIOLATION OF THE FREE EXERCISE OF CATHOLIC SOCIAL SERVICES.

BUT THERE IS NO IRREPARABLE HARM, ANY BUSINESS HARMS. WE ARE TRYING TO MITIGATE. WE ARE TRYING TO NEGOTIATE WITH THEM. AND WE ARE DOING EVERYTHING WITH THE POLE STAR OF THE BEST INTEREST OF THE CHILDREN, TO KEEP THOSE CHILDREN IN THE HOMES WHERE

THEY HAVE BEEN PLACED SO THAT THEY ARE NOT BEING -- THEIR CARE IS NOT BEING DISRUPTED. THEY ARE WITH THEIR FOSTER PARENTS, AND AS YOU WILL HEAR, IF THERE CANNOT BE A RESOLUTION TO THIS, DHS HAS TRANSITIONED FAMILIES IN THE PAST, SEVERAL TIMES BEFORE, AND WITHOUT ANY HARM.

AND IN CONCLUSION, WE WILL -- YOU KNOW, I ARGUE THERE IS NO BASIS FOR AN INJUNCTION AND THAT ANY -- THAT REQUIRING THE CITY TO ENTER INTO A CONTRACT WOULD BE A FORM OF RELIEF THAT WOULD NOT REPRESENT THE STATUS QUO, WHICH IS WHAT THEY ARE ASKING. OUR CONTRACTS EXPIRE ON THE 30TH OF JUNE AND SO THEY ARE ACTUALLY ASKING FOR A CONTRACT OF THEIR CHOICE AS INTERIM RELIEF. AND WE ARE DOING WHATEVER WE CAN TO MINIMIZE THE PROBLEM SO THE INTAKE IS NOT A PENALTY BUT IT IS A WAY OF MAKING SURE THAT WE ARE NOT CREATING -- ENLARGING THE NUMBER OF HOMES THAT ARE GOING TO HAVE TO BE ADDRESSED IF WE CAN'T GET TO AN AGREEMENT. SO IN THE -- THERE IS NO BASIS UPON WHICH AN INJUNCTION SHOULD BE GRANTED AND THE EQUITIES DO NOT POINT TO CATHOLIC SOCIAL SERVICES. WE VALUE THEIR SERVICE, BUT IF WE CANNOT GET TO A PLACE WHERE WE CAN AGREE AND GO FORWARD ON THE CONTRACT THAT IS WRITTEN AND OUR ANTIDISCRIMINATION POLICY, THEN WE HAVE TO PART. THANK YOU.

THE COURT: THANK YOU.

PLAINTIFF, CALL YOUR FIRST WITNESS.

MS. BARCLAY: GOOD AFTERNOON, YOUR HONOR. STEPHANIE BARCLAY FOR THE PLAINTIFFS, AND WE WOULD LIKE TO CALL MS. TONI SIMMS-BUSCH TO THE STAND.

(WITNESS SWORN.)

THE WITNESS: TONI SIMMS-BUSCH, T-O-N-I, LAST NAME SIMMS, S-I-M-M-S-B-U-S-C-H.

MS. BARCLAY: WOULD YOU LIKE ME AT THE PODIUM?

THE COURT: YES, PLEASE.

DIRECT EXAMINATION

BY MS. BARCLAY:

Q. GOOD AFTERNOON.

A. GOOD AFTERNOON.

Q. PLEASE STATE YOUR NAME FOR THE RECORD.

A. TONI SIMMS-BUSCH.

Q. CAN YOU DESCRIBE YOUR CURRENT RELATIONSHIP WITH CATHOLIC SOCIAL SERVICES?

A. I AM A FOSTER MOTHER.

Q. IN WHAT CITY DO YOU LIVE?

A. PHILADELPHIA, PENNSYLVANIA.

Q. HOW LONG HAVE YOU LIVED THERE?

A. PHILADELPHIA, PENNSYLVANIA? MY ENTIRE LIFE, 38 YEARS.

Q. CAN YOU DESCRIBE YOUR EDUCATIONAL BACKGROUND?

A. YES. I HAVE A BACHELOR'S DEGREE FROM CHATHAM

COLLEGE IN FORENSIC PSYCHOLOGY AND I STARTED A MASTER'S PROGRAM AT ARGOSY UNIVERSITY FOR COUNSELING FORENSIC PSYCHOLOGY.

Q. HOW DID YOU DO ACADEMICALLY IN THESE PROGRAMS?

A. I DID VERY WELL.

Q. CAN YOU DESCRIBE A LITTLE BIT ABOUT YOUR RELEVANT WORK EXPERIENCE?

A. YES. WHEN I GRADUATED IN 2002, I WORKED AS A YOUTH COUNSELOR WITH A PARTIAL CARE PROGRAM FOR CHILDREN 3 TO 5 AND 6 TO 9. I THEN WORKED IN A RESIDENTIAL TREATMENT FACILITY FOR ADOLESCENT MALE AND FEMALES IN NEW JERSEY. I THEN WORKED AT PSI FAMILY SERVICES AS A FOSTER CARE AGENCY WORKER. AFTER THAT I WAS A CHILD ADVOCATE SOCIAL WORKER FOR NEARLY FOUR YEARS WITH THE DEFENDER ASSOCIATION OF PHILADELPHIA.

Q. WERE YOU A FOSTER CARE SOCIAL WORKER IN PHILADELPHIA?

A. YES.

Q. AND WERE YOU A CHILD ADVOCATE SOCIAL WORKER IN PHILADELPHIA?

A. YES.

Q. YOU MENTIONED THAT YOU WORKED AT AN IN-STAFF AND GROUP HOMES. HOW LONG DID YOU WORK IN THAT POSITION?

A. A LITTLE OVER TWO YEARS.

Q. WHEN YOU WERE A FOSTER CARE SOCIAL WORKER, HOW

LONG DID YOU WORK IN THAT POSITION?

A. A LITTLE OVER TWO YEARS.

Q. AND WHEN YOU WERE A CHILD ADVOCATE SOCIAL WORKER, HOW MANY YEARS WERE YOU IN THAT POSITION?

A. APPROXIMATELY FOUR YEARS.

Q. I WOULD LIKE TO TALK TO YOU A LITTLE BIT ABOUT YOUR OBSERVATIONS AS A FOSTER WORKER IN PHILADELPHIA. DURING YOUR WORK, DID YOU EVER OBSERVE IN YOUR EXPERIENCE THERE TO BE A SHORTAGE OF FOSTER HOMES FOR CHILDREN?

A. YES.

Q. WHAT SORT OF THINGS DID YOU OBSERVE THAT LED YOU TO THINK THAT?

A. AS A FOSTER CARE WORKER, AS A CHILD ADVOCATE SOCIAL WORKER, MY PROFESSIONAL EXPERIENCE WAS THAT CHILDREN WERE CONSTANTLY BEING RELOCATED DUE TO PLACEMENT ISSUES. SEVERAL CHILDREN HAD TO BE PLACED -- SEVERAL TEENAGE CHILDREN HAD TO BE PLACED IN SHELTERS DUE TO A LACK OF AVAILABLE FOSTER HOMES. CHILDREN HAD TO BE PLACED IN RESPITE FOR TEMPORARY HOLD UNTIL PERMANENT FOSTER HOMES COULD BE LOCATED, AND CHILDREN SOMETIMES -- I HAD A FEW CASES WHERE CHILDREN WOULD HAVE TO STAY AT THE DHS BUILDING UNTIL A PLACEMENT WOULD BE FOUND.

Q. WHAT SORT OF IMPACT DID YOU EXPERIENCE THAT TO

HAVE ON CHILDREN?

A. IT WAS DEVASTATING. CHILDREN, YOU KNOW, THEY COME FROM A TRAUMATIC EXPERIENCE, LOSING THEIR BIOLOGICAL FAMILY, BEING PLACED OUT BY THEIR BIOLOGICAL FAMILY INTO AN UNKNOWN CIRCUMSTANCE, INTO AN UNKNOWN PLACEMENT, AND THEN BEING RELOCATED AGAIN FOR WHATEVER REASON. SO IT INTERRUPTED THEIR STABILITY, THEIR ABILITY TO BOND, THEIR ABILITY TO FORM ATTACHMENTS AND THEIR EDUCATION.

Q. DID YOU EXPERIENCE THERE TO BE ANY SORT OF CORRELATION BETWEEN NOT IN A FOSTER HOME AND THE AMOUNT OF TIMES CHILDREN WOULD BE TRANSFERRED?

A. YES.

Q. WHAT WAS THE CORRELATION?

A. YES. SO IF THERE WERE NOT A LOT OF FOSTER HOMES OR AVAILABLE FOSTER HOMES, CHILDREN WOULD BE MOVED MULTIPLE TIMES AGAIN. THEY MAY BE MOVED INTO A SHELTER, THEY MAY BE MOVED INTO A RESPITE, THEY MAY BE MOVED INTO A PERMANENT HOME IF IT WERE AVAILABLE.

Q. WHAT HAPPENS TO A CHILD IN YOUR EXPERIENCE WHEN THEY ARE BEING TRANSFERRED?

A. AGAIN, CHILDREN LOSE THEIR ATTACHMENT, THEY LOSE THEIR SENSE OF SELF, THEIR EDUCATION MAY BE INTERRUPTED.

Q. IS THERE ANY TRAUMA INVOLVED?

A. ABSOLUTELY. EVERY TIME A CHILD IS MOVED, THEIR

TRAUMA IS IMPACTED AND COMPACTED.

Q. CAN YOU DESCRIBE A LITTLE MORE FROM YOUR EXPERIENCE WHAT IT'S LIKE FOR A CHILD TO SPEND A NIGHT OR MULTIPLE NIGHTS AT THE DHS OFFICE?

A. IT'S DEVASTATING. I HAVE BEEN THERE JUST A FEW HOURS AS A WORKER AND IT'S NOT A HAPPY PLACE, IT'S NOT DISNEY WORLD. SO FOR A CHILD TO HAVE TO SPEND, YOU KNOW, MORE THAN A COUPLE OF HOURS THERE, POSSIBLY HAVING TO SPEND THE NIGHT THERE, I AM SURE IT'S A VERY --

MS. CORTES: YOUR HONOR, I AM GOING TO OBJECTION TO SPECULATION AT THIS POINT.

THE COURT: SUSTAINED.

MS. CORTES: AND I WOULD LIKE TO STRIKE THE RECORD FOR THE ENTIRE LINE OF QUESTIONING.

THE COURT: BUT I WON'T STRIKE IT. BUT IF YOU COULD PROCEED TO ANOTHER SUBJECT.

MS. BARCLAY: CERTAINLY, YOUR HONOR.

BY MS. BARCLAY:

Q. HOW WOULD YOU DESCRIBE THE DIFFERENCE, AGAIN WHAT YOU EXPERIENCED BEING A STAFF MEMBER IN SOME OF THESE DIFFERENT FACILITIES, BETWEEN THE CARE YOU PROVIDED TO A CHILD IN A GROUP HOME AS OPPOSED TO THE TYPE OF CARE A CHILD RECEIVED IN A PERMANENT FOSTER HOME?

A. IN A PERMANENT FOSTER HOME, A CHILD RECEIVES

CONSISTENT LOVE AND SUPPORT, EDUCATIONAL SUPPORT, CONSISTENT SUPERVISION. THE OPPOSITE TO THAT IN A GROUP HOME OR A FOSTER HOME, IN ANY RESIDENTIAL TREATMENT FACILITY BUT --

MS. CORTES: YOUR HONOR, SAME OBJECTION.

MS. BARCLAY: YOUR HONOR, THIS IS --

THE COURT: OVERRULED.

THE WITNESS: WHETHER IT BE A SHELTER, THE CHILD DOES NOT RECEIVE THAT SAME LOVE AND CARE, THAT SAME NURTURING, THAT SAME SUPPORT. IT IS BASICALLY JUST ABOUT SUPERVISION, MAKING SURE THAT THE CHILD ADHERES TO RULES. THERE IS NO ONE-TO-ONE OR VERY LITTLE ONE-TO-ONE INTERACTION THAT THE CHILD WILL RECEIVE FROM A STAFF MEMBER.

BY MS. BARCLAY:

Q. HOW WOULD YOU DESCRIBE YOUR PRIMARY ROLE IN A GROUP HOME?

A. TO SUPERVISE AND SUPPORT, TO MAKE SURE THAT RULES ARE FOLLOWED, TO MAKE SURE THAT STRUCTURE IS IMPLEMENTED.

Q. DID YOU EVER OBSERVE IN YOUR EXPERIENCE A CORRELATION BETWEEN THERE NOT BEING ENOUGH FOSTER HOMES AND CHILDREN BEING LEFT IN BIOLOGICAL HOMES?

A. YES.

Q. CAN YOU TALK ABOUT THAT A LITTLE?

A. YES, WHEN I WAS A FOSTER CARE SOCIAL WORKER, THE AGENCIES THAT I HAD WORKED WITH AT THE TIME WERE PREPARING TO CLOSE AND WE HAD CHILDREN WHO -- BECAUSE OF CONTRACTUAL ISSUES WITH THE CITY, THE CHILDREN WERE BEING PLACED INTO SHELTER CARE, SOME OF THEM WERE PLACED INTO RESPITE, TWO WERE PLACED BACK INTO BIOLOGICAL HOMES, WHICH AT THE TIME AS A FOSTER CARE WORKER WAS NOT APPROPRIATE FOR THEM.

Q. AND SO YOU HAVE DISCUSSED GROUP HOMES, SHELTERS, OTHER BIOLOGICAL HOMES, THE DHS OFFICE. IN YOUR EXPERIENCE WORKING WITH CHILDREN, HOW DID THOSE OPTIONS COMPARE TO THE CARE GIVEN A CHILD IN A PERMANENT FOSTER HOME?

A. NOTHING COMPARES TO THE STABILITY OF A PERMANENT FOSTER HOME. NOTHING COMPARES TO THAT DAILY LOVE AND CARE, THOSE HUGS AND KISSES, THE EDUCATIONAL SUPPORT, NOTHING IN THE WORLD COMPARES TO THAT.

Q. IF YOU HAD THE CHOICE BETWEEN A TEMPORARY FOSTER PLACEMENT FOR A CHILD OR A PERMANENT FOSTER PLACEMENT, WHICH IN YOUR EXPERIENCE WOULD HAVE GENERALLY BEEN IN THE BEST INTEREST OF THE CHILD?

A. 100 PERCENT A MORE PERMANENT FOSTER HOME.

Q. DID YOU EVER EXPERIENCE A TIME WHEN THERE WAS A FREEZE IN REFERRALS WHEN YOU WERE A FOSTER CARE WORKER?

A. YES. AGAIN, THERE WERE CONTRACTUAL ISSUES WITH

THE AGENCY THAT I WAS WORKING WITH AND THERE WAS A FREEZE. SO WE WERE NOT GETTING ANY NEW REFERRALS, CHILDREN WERE BEING AGAIN NOT PLACED IN THE APPROPRIATE PLACEMENT BECAUSE OUR FOSTER CARE REFERRALS WERE BEING FROZEN. AND SO AGAIN WE HAD TO PLACE KIDS AS BEST AS WE COULD.

Q. DOES THE AGENCY THAT YOU WERE WORKING AT STILL EXIST?

A. NO.

Q. WERE YOU THERE WHEN THAT AGENCY CLOSED?

A. YES, I WAS.

Q. CAN YOU DESCRIBE WHAT YOU OBSERVED TO BE IMPACTS ON SOME OF THE FAMILIES AND SOME OF THE CHILDREN YOU WORKED WHEN THAT AGENCY CLOSED?

A. I WITNESSED CHILDREN BEING MOVED FROM KINSHIP HOMES INTO RESPITE HOMES AND GROUP HOMES AND SHELTERS. I WITNESSED FOSTER CHILDREN BEING PLACED IN RESPITE HOMES BECAUSE THE AGENCY WAS WORKING -- SOME OF THOSE FOSTER PARENTS AND SOME OF THOSE KINSHIP PARENTS CHOSE NOT TO GO TO ANOTHER AGENCY, FOR WHATEVER REASON. AND SO CHILDREN WERE CONSTANTLY BEING PLACED INTO UNFAMILIAR SITUATIONS.

Q. SO WERE ANY OF THESE FAMILIES THAT YOU SERVED BROKEN APART?

A. ABSOLUTELY.

Q. AND WHAT DID YOU OBSERVE TO BE THE IMPACT ON THE CHILDREN?

A. IT WAS DEVASTATING. I HAD A CASE ABOUT A LITTLE GIRL, SHE WAS APPROXIMATELY SEVEN YEARS OLD. SHE WAS IN A KINSHIP HOME. SHE HAD BEEN THERE ALMOST SINCE BIRTH, AND BECAUSE OF THE DIFFICULTIES WITH -- YOU KNOW, WITH THE CONTRACT, THE CITY SAID THAT WE HAD TO LOCATE A MORE PERMANENT HOME FOR HER, BECAUSE THE KINSHIP AUNT WOULD NOT ADOPT THE CHILD. THERE WAS A VERY STRONG BOND BETWEEN THE BIOLOGICAL MOTHER AND THE CHILD AND THE FAMILY AND THEY DIDN'T WANT TO TAKE THAT BOND AWAY. WE HAD TO REMOVE THAT CHILD TO ANOTHER HOME. AND I WITNESSED HER DEVASTATION, I WITNESSED HER TRAUMA.

Q. DID SOME OF THESE FAMILIES FEEL LIKE THEY WERE UNABLE TO TRANSFER TO A NEW AGENCY?

A. YES.

Q. HOW DID THIS HAPPEN?

A. THEY DIDN'T FEEL LIKE THEY WERE GOING TO GAIN THE SAME SUPPORT AS THEY HAD BEEN RECEIVING.

MS. CORTES: OBJECTION, YOUR HONOR, SPECULATION AGAIN.

THE COURT: SUSTAINED.

MS. CORTES: I ASK THAT YOU STRIKE HER ANSWER.

THE COURT: THAT ANSWER WILL BE STRICKEN.

BY MS. BARCLAY:

Q. AS A FOSTER CARE WORKER, DID YOU EVER REFER PROSPECTIVE FOSTER FAMILIES TO OTHER AGENCIES?

A. YES. THERE WERE INSTANCES WHERE I NEEDED TO REFER THEM OUT TO OTHER AGENCIES FOR VARIOUS REASONS. PERHAPS THERE WAS A LANGUAGE BARRIER, PERHAPS THERE WAS A DIFFICULT MEDICAL CASE OR BEHAVIORAL HEALTH CASE THAT MY AGENCY COULD NOT SUPPORT.

Q. I WANT TO TAKE EACH OF THOSE WITH YOU IN TURN. IN THE CONTEXT OF A LANGUAGE ISSUE, WALK ME THROUGH WHAT A REFERRAL WOULD LOOK LIKE AND WHY THAT WOULD ARISE?

A. RIGHT. SO IF I HAD A CLIENT OR A FAMILY WHO WAS OF ANOTHER LANGUAGE AND FOR SOME REASON I COULD NOT ACCOMMODATE THEM OR MY AGENCY COULD NOT ACCOMMODATE THEM, I WOULD CONTACT A SPECIALIZED AGENCY AND MAKE THAT REFERRAL FOR THAT FAMILY TO BE SERVICED.

Q. WHAT WAS THE NAME OF ONE OF THE AGENCIES WITH LANGUAGE SPECIALTY YOU REFERRED FAMILIES TO?

A. CONCILIO.

Q. DID YOU EVER REFER FAMILIES FOR GEOGRAPHIC REASONS?

A. YES. WE HAD TO REFER FAMILIES FOR GEOGRAPHICAL REASONS. PERHAPS A CHILD WAS IN A SPECIFIC SCHOOL DISTRICT AND WE WANTED TO KEEP THEM IN THAT SCHOOL DISTRICT, OR EVEN FOR SAFETY REASONS, IF A PARENT WAS IN

A CERTAIN NEIGHBORHOOD AND WE WANTED TO REFER THEM OUT, THE FAMILIES WOULD REFER THEM OUT TO A DIFFERENT AGENCY IN ANOTHER NEIGHBORHOOD.

Q. DID YOU EVER REFER FAMILIES FOR BEHAVIORAL HEALTH SPECIALTY REASONS?

A. YES. YES, WE HAD TO DO THAT AS WELL. AGAIN, IF OUR AGENCY WAS NOT ABLE TO COPE WITH THAT CHILD OR THE FAMILY WAS UNABLE TO COPE WITH IT AND NEEDED SPECIALIZED -- AND THAT CHILD NEEDED SPECIALIZED SERVICES, WE WOULD REFER OUT TO A DIFFERENT AGENCY.

Q. WERE YOU AWARE OF REFERRALS ALSO BEING MADE FOR SPECIALIZED MEDICAL NEEDS OF A CHILD?

A. YES, MEDICAL WOULD BE THE SAME.

Q. DID DHS EVER PENALIZE OR SANCTION YOU FOR ENGAGING IN THESE REFERRALS?

A. NO.

Q. DID YOU THINK THAT YOU WERE DOING ANYTHING OUT OF THE ORDINARY WHEN YOU MADE THESE SORTS OF REFERRALS?

A. NO. REFERRALS ARE MADE ALL THE TIME.

Q. WHEN A NEW PROSPECTIVE FOSTER FAMILY APPROACHES AN AGENCY AND COMES TO THEM THROUGH THE INTAKE PROCESS, IS THAT A DHS REFERRAL TO THE AGENCY?

A. NO, THAT'S AN INDEPENDENT REFERRAL, LIKE A SELF REFERRAL, IT'S NOT AN DHS REFERRAL.

Q. SO THAT'S A SEPARATE PIPELINE FOR OBTAINING

FAMILIES?

A. YES. DHS DID NOT REFER ME TO BE A FOSTER PARENT, I SELF REFERRED MYSELF.

Q. DO YOU HAVE ANY EXPERIENCE WITH HOW FOSTER CARE PLACEMENT WORKS FOR NATIVE AMERICAN CHILDREN IN PENNSYLVANIA?

A. YES. I HAVE HAD PERSONAL EXPERIENCE WITH THAT, SO PRIOR TO ME BECOMING A FOSTER PARENT WITH CATHOLIC SOCIAL SERVICES, I HAVE NATIVE AMERICAN HERITAGE, I WAS THINKING ABOUT ADOPTING OR FOSTERING A NATIVE AMERICAN CHILD AND BECAUSE I CANNOT CERTIFY MYSELF AS A NATIVE AMERICAN, I WAS UNABLE TO DO THAT.

Q. AND WAS YOUR EXPERIENCE THAT YOU COULD HAVE GONE TO ANY AGENCY TO TRY AND FOSTER A NATIVE AMERICAN CHILD?

A. NO, I CANNOT. I CANNOT.

Q. SO WHAT WOULD HAPPEN IF YOU WENT TO AN AGENCY, ANY AGENCY IN PHILADELPHIA, FOR EXAMPLE, TRYING TO FOSTER A NATIVE AMERICAN CHILD?

A. I WOULD NOT BE ABLE TO DO THAT BECAUSE I CANNOT CERTIFY MYSELF AS A NATIVE AMERICAN.

Q. WHAT WOULD THE AGENCY DO FOR YOU?

A. REFER ME TO -- YOU KNOW, I WAS NOT DENIED TO BECOME A FOSTER PARENT, BUT I CANNOT BE A FOSTER PARENT OF A NATIVE AMERICAN CHILD.

Q. IF YOU WENT TO AN AGENCY THAT SPECIALIZED IN

PLACING NATIVE AMERICAN CHILDREN, AGAIN, WHAT WOULD THAT AGENCY DO FOR YOU?

A. REFER ME OUT.

Q. AS A FOSTER PARENT, DID YOU EVER WORK WITH GAY -- OR EXCUSE ME. AS A FOSTER WORKER, DID YOU EVER WORK WITH GAY FOSTER PARENTS?

A. YES.

Q. WHAT WAS YOUR EXPERIENCE WITH THAT FAMILY?

A. I HAD A SPECIFIC FAMILY, A MALE FOSTER PARENT. HE HAD THREE YOUNG BOYS. I THOUGHT HE WAS AN EXCELLENT FOSTER PARENT. TOOK VERY WELL -- YOU KNOW, TOOK VERY GOOD CARE OF THOSE BOYS.

Q. I WANT TO TALK TO YOU A LITTLE BIT ABOUT YOUR INTERACTIONS WITH OTHER FOSTER AGENCIES DURING YOUR CHILD ADVOCACY WORK. WHEN YOU WORKED AS A CHILD ADVOCATE SOCIAL WORKER, DID YOU PERSONALLY INTERACT WITH OTHER FOSTER AGENCIES IN PHILADELPHIA?

A. YES. YES, I HAVE.

Q. WHICH AGENCIES DID YOU INTERACT WITH?

A. PRETTY MUCH ALL OF THEM.

Q. FROM YOUR INTERACTIONS, WHAT DID YOU PERSONALLY OBSERVE ABOUT THE QUALITY OF CARE THAT THESE AGENCIES WERE PROVIDING?

MS. CORTES: YOUR HONOR, I WOULD OBJECT TO RELEVANCE.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. DID YOU EVER OBSERVE WAYS IN WHICH CATHOLIC SOCIAL SERVICES PROVIDED SERVICES THAT WERE BENEFICIAL FOR CHILDREN?

A. YES.

Q. CAN YOU GIVE SOME EXAMPLES OF THAT FROM YOUR PERSONAL EXPERIENCE?

A. AS A PROFESSIONAL AND ALSO AS A FOSTER MOTHER, I RECEIVED A GREAT DEAL OF SUPPORT, A GREAT DEAL OF CARE. IF I HAVE A PROBLEM OR DIFFICULTY OR JUST NEED TO VENT, I CAN CONTACT MY SOCIAL WORKER, MY SUPERVISOR, MY DIRECTOR AT ANY TIME.

Q. HOW WOULD YOU DESCRIBE THE CONTINUITY OF STAFF AND HOW THAT IMPACTED CHILDREN AT CATHOLIC SOCIAL SERVICES?

A. I HAVE WORKED WITH CATHOLIC SOCIAL SERVICES FOR A VERY LONG TIME, BOTH PROFESSIONALLY AND AS A FOSTER PARENT, AND THERE IS A GREAT DEAL OF CONTINUITY. I HAVE NOT EXPERIENCED ANY TURNOVER AT ALL IN STAFF, AND THAT CERTAINLY HELPS THE CHILDREN BECAUSE THEY SEE THE SAME FACES, THEY ARE ABLE TO CREATE BONDS WITH THE WORKERS AND ALSO THE FOSTER PARENTS BECAUSE THEY KNOW WHO THEY ARE GOING TO BE ABLE TO CONTACT.

Q. AS A CHILD ADVOCATE SOCIAL WORKER, WERE YOU EVER

AWARE OF INSTANCES WHERE CITY ATTORNEYS WOULD NOT SPEAK WITH YOU ABOUT A CHILD'S CASE?

A. NO.

Q. THAT WAS NOT SOMETHING YOU OBSERVED TO BE A COMMON PRACTICE?

A. NO, I HAD VERY GOOD RELATIONSHIPS WITH THE DHS ATTORNEYS.

Q. WERE PEOPLE YOU INTERACTED WITH GENERALLY AWARE OF THE RELIGIOUS NATURE OF CATHOLIC SOCIAL SERVICES?

A. YES.

MS. CORTES: OBJECTION, SPECULATION AS WELL, YOUR HONOR.

THE COURT: OVERRULED.

BY MS. BARCLAY:

Q. HOW LONG -- LET'S TALK ABOUT YOUR TIME AS A FOSTER PARENT. HOW LONG HAVE YOU BEEN A FOSTER PARENT?

A. FOR APPROXIMATELY TWO-AND-A-HALF YEARS.

Q. CAN YOU TELL US ABOUT WHAT INFLUENCED YOUR DECISION TO BECOME A FOSTER PARENT?

A. MY WORK AS A PROFESSIONAL AND ALSO MY PERSONAL INABILITY TO HAVE CHILDREN. AND ALSO MY BELIEF THAT -- I BELIEVE THAT GOD PLACED IT IN MY HEART AS A CALLING.

Q. WHAT INFLUENCED YOUR DECISION TO CHOOSE CATHOLIC SOCIAL SERVICES?

A. MY PROFESSIONAL WORK WITH THEM AND ALSO MY

CATHOLIC BELIEFS. I KNEW THAT WE WOULD SHARE THE SAME FOUNDATIONAL BELIEFS.

Q. CAN YOU DESCRIBE SOME OF THE SUPPORT YOU HAVE RECEIVED FROM CATHOLIC SOCIAL SERVICES AND HOW THAT HAS BEEN IMPORTANT FOR YOU?

A. AGAIN, I KNOW THAT I CAN CALL ANYONE ON MY TEAM AT ANY HOUR OF THE DAY AND SOMETIMES AT NIGHT, OR TEXT THEM AND I KNOW THAT THEY ARE GOING TO BE THERE. I KNOW IF I MY CALL WORKER, HE IS GOING TO COME AS SOON AS HE CAN. HE WILL SPEND ANYWHERE BETWEEN A HALF AN HOUR TO A COUPLE OF HOURS IF HE NEEDS TO OR IF HE WANTS TO, JUST PLAYING WITH MY BOYS OR BEING THERE FOR ME AS A SUPPORT.

Q. ARE YOU CURRENTLY CARING FOR FOSTER CHILDREN?

A. I HAVE TWO YOUNG BOYS. I HAVE A TWO YEAR OLD WHO HAS BEEN WITH ME FOR 16 MONTHS AND I HAVE A -- HE WILL BE FIVE MONTHS OLD ON THE 21ST OF THIS MONTH AND HE HAS BEEN WITH ME SINCE HE WAS THREE DAYS OLD. THEY ARE SIBLINGS.

Q. ARE YOU INTERESTED IN FOSTERING ADDITIONAL CHILDREN IN THE FUTURE?

A. I WOULD, YES. I WOULD BE VERY OPEN.

Q. WOULD YOU BE OPEN TO FOSTERING SIBLINGS OF YOUR BOYS?

A. YES.

Q. ARE THERE THINGS THAT YOU HAVE EXPERIENCED

CATHOLIC SOCIAL WORKERS TO DO TO HELP YOUR BOYS TO LOVE, TO BE CARED FOR?

A. YES. AGAIN, WHEN MY WORKER COMES, HE SPENDS TIME WITH MY BOYS, HE PLAYS WITH THEM, HE INTERACTS WITH THEM. AND HE -- I BELIEVE MY BOYS HAVE A BOND WITH HIM. WHEN MY TWO-YEAR OLD SEES MY WORKER COMING, HE RUNS TO HIM. HE DOES NOT RUN TO MANY PEOPLE, SO THAT'S A GOOD THING.

Q. DO YOU WORK WITH CUA AS WELL?

A. I DO.

Q. WHICH CUA DO YOU WORK WITH?

A. NET CUA 7.

Q. IS THAT CUA AFFILIATED WITH CATHOLIC SOCIAL SERVICES?

A. NO.

Q. HOW DID YOUR RELATIONSHIP WITH SOCIAL WORKERS AT THAT CUA DIFFER, IF AT ALL?

MS. CORTES: OBJECTION, RELEVANCE.

MS. BARCLAY: YOUR HONOR, THIS IS RELEVANT TO THE TYPE OF HARM THAT MS. SIMMS-BUSCH WILL EXPERIENCE IF SHE IS NO LONGER ABLE TO HAVE SOME OF THESE UNIQUE RELATIONSHIPS WITH HER SOCIAL WORKERS AT CATHOLIC SOCIAL SERVICES.

THE COURT: OVERRULE.

AND CAN YOU SPECIFICALLY SAY WHAT CUA IS?

THERE'S A LOT OF ACRONYMS.

BY MS. BARCLAY:

Q. COULD YOU STATE AGAIN WHICH CUA YOU WORK WITH?

A. NET CUA 7, NORTHEAST CUA 7, CUA, COMMUNITY UMBRELLA AGENCY.

THE COURT: AND WHAT DOES CUA STAND FOR?

THE WITNESS: COMMUNITY UMBRELLA AGENCY, YOUR HONOR.

THE COURT: OKAY.

THE WITNESS: IT'S AN AGENCY WHICH DHS HAS CREATED IN ORDER TO SUPERVISE CHILDREN IN THEIR FOSTER HOMES.

MS. CORTES: YOUR HONOR, WE WOULD RENEW OUR OBJECTION TO THE RELEVANCE REGARDING THE CUA IN THIS CASE, SINCE THEY ARE NOT PART OF THIS LAWSUIT AND MORE SO IT DEALS WITH GEOGRAPHIC ISSUES.

MS. BARCLAY: YOUR HONOR, AGAIN, I JUST WANT TO POINT OUT THE WAY IN WHICH HER RELATIONSHIP WITH THE CATHOLIC SOCIAL SERVICES SOCIAL WORKER IS UNIQUE AND COMPARE THAT TO RELATIONSHIPS WITH OTHER SOCIAL WORKERS.

THE COURT: I WILL OVERRULE THE OBJECTION.

BY MS. BARCLAY:

Q. MS. SIMMS-BUSCH, HOW DOES YOUR RELATIONSHIP AND THE RELATIONSHIP OF YOUR CHILDREN WITH YOUR CATHOLIC

SOCIAL WORKER DIFFER IF AT ALL FROM YOUR RELATIONSHIP WITH THE SOCIAL WORKER AT THE CUA?

A. AGAIN, MY BOYS RUN TO MY CATHOLIC SOCIAL SERVICES -- OR AT LEAST MY TWO-YEAR OLD RUNS TO MY CATHOLIC SOCIAL SERVICES WORKER. HE INTERACTS WITH HIM. THERE IS NO INTERACTION WITH MY CUA WORKER. I'VE ACTUALLY -- IN THE TIME THAT I HAVE HAD MY BOYS THE LAST 16 MONTHS, I HAVE HAD FOUR CUA WORKERS. THERE IS NO CONTINUITY, THERE IS NO CONTINUATION OF CARE. MY BOYS HAVE NO RELATIONSHIP. THERE IS NO TIME TO BUILD A RELATIONSHIP OR A BOND.

Q. AND IN YOUR EXPERIENCE, IS THE CONTINUITY WITH THE SOCIAL WORKERS AT CATHOLIC SOCIAL SERVICES SOMETHING UNIQUE?

A. ABSOLUTELY.

Q. HOW WOULD YOU BE IMPACTED AS A FOSTER MOTHER IF CATHOLIC HAS TO CLOSE ITS FOSTER PROGRAM?

A. I HAVE NO IDEA. I WAS SITTING THERE LISTENING TO THE OPENING ARGUMENTS AND DIDN'T REALIZE HOW CLOSE THE DEADLINE WAS AND IT ALMOST BROUGHT TEARS TO MY EYES. I HAVE NO IDEA WHAT IS GOING TO HAPPEN TO THE CARE OF MY BOYS OR TO MYSELF OR WHAT DECISION I AM GOING TO HAVE TO MAKE.

Q. HOW WILL YOU BE IMPACTED BY THE LOSS OF SUPPORT, IF AT ALL?

A. I DON'T KNOW WHAT I WOULD DO.

Q. WOULD YOU BE ABLE TO CONTINUE AS A FOSTER PARENT WITH A DIFFERENT AGENCY?

A. AGAIN, I AM SITTING HERE QUESTIONING THIS AS I SIT HERE BECAUSE I CARE ABOUT MY BOYS SO MUCH, SO WHAT -- IT'S LIKE I AM BEING BACKED INTO A CORNER. WHAT CHOICE DO I HAVE?

Q. WOULD IT BE DIFFICULT FOR YOU AND A LOSS IF YOU HAD TO CONTINUE AS A FOSTER PARENT WITH A DIFFERENT AGENCY?

A. ABSOLUTELY.

Q. HOW HAVE YOU FELT OF THE WAY THAT THE CITY HAS TREATED CATHOLIC SOCIAL SERVICES OVER THE LAST FEW MONTHS?

MS. CORTES: OBJECTION, YOUR HONOR.

THE COURT: SUSTAINED.

MS. BARCLAY: THANK YOU, MS. SIMMS-BUSCH. NO FURTHER QUESTIONS.

THE WITNESS: THANK YOU.

THE COURT: CROSS-EXAMINE.

MS. BARCLAY: YOUR HONOR, PLAINTIFFS WOULD LIKE TO CALLS SHARONELL FULTON.

THE COURT: CROSS-EXAMINE.

MS. BARCLAY: SORRY.

CROSS EXAMINATION

BY MS. CORTES:

Q. GOOD AFTERNOON, MS. BUSCH.

A. GOOD AFTERNOON.

Q. MS. BUSCH, YOU HAD TESTIFIED EARLIER ABOUT YOUR PRIOR EXPERIENCE WITHIN THE FOSTER CARE AGENCY, IS THAT CORRECT?

A. THAT IS CORRECT.

Q. AND YOU HAD TESTIFIED EARLIER ABOUT CHILDREN BEING RELOCATED AND RESPITE AND THAT'S -- DO YOU RECALL THAT TESTIMONY?

A. YES, MA'AM.

Q. I DIDN'T GET THE DATE. CAN YOU TELL US WHEN YOU EXPERIENCED THAT?

A. THAT WAS APPROXIMATELY -- IT WAS A LITTLE OVER TEN YEARS AGO.

Q. OKAY.

A. YES.

Q. AND DESPITE YOUR -- YOU HAVE ONLY BEEN A FOSTER PARENT WITH CATHOLIC SOCIAL SERVICES, IS THAT CORRECT?

A. YES.

Q. YOU HAVE NOT BEEN A FOSTER PARENT WITH ANY OTHER OF -- ANY OF THE OTHER 30 AGENCIES IN THE CITY, CORRECT?

A. NO, WHEN I --

Q. OKAY, THANK YOU.

AND JUST FOCUSING ON SOME -- YOU ARE

FAMILIAR WITH THE CERTIFICATION PROCESS THAT YOU HAD TO GO THROUGH TO BE A FOSTER PARENT?

A. YES, MA'AM.

Q. DO YOU PERFORM ANY OF THE CERTIFICATIONS FOR ANY NEW FOSTER FAMILY FOR CSS?

A. NO, MA'AM.

Q. OKAY.

MS. CORTES: COURT'S INDULGENCE, YOUR HONOR.

(BRIEF PAUSE IN THE PROCEEDING.)

BY MS. CORTES:

Q. I THINK IT'S ONE LAST QUESTION.

YOU MENTIONED THAT A FOSTER AGENCY HAD CLOSED IN YOUR EXPERIENCE AS A SOCIAL WORKER?

A. YES, MA'AM.

Q. CAN YOU TELL US WHAT WAS THE NAME OF THAT FOSTER AGENCY?

A. YES, IT WAS PSI FAMILY SERVICES. IT WAS LOCATED AT 701 MARKET STREET IN PHILADELPHIA.

Q. AND WHEN DID THAT HAPPEN?

A. AGAIN, A LITTLE OVER TEN YEARS AGO. I'M SORRY, I DON'T HAVE THE SPECIFIC DATE.

Q. OKAY, THAT'S FINE.

MS. CORTES: THANK YOU.

MS. BARCLAY: BRIEF REDIRECT, YOUR HONOR?

THE COURT: YES.

REDIRECT

BY MS. BARCLAY:

Q. MS. SIMMS-BUSCH, YOU HAVE ONLY BEEN A FOSTER PARENT WITH CATHOLIC SOCIAL SERVICES, CORRECT?

A. YES.

Q. HAVE YOU HAD EXPERIENCES WITH ALL THE OTHER FOSTER AGENCIES IN PHILADELPHIA?

A. YES, I HAVE.

MS. CORTES: OBJECTION TO THE RELEVANCE, YOUR HONOR.

MS. BARCLAY: YOUR HONOR, THIS IS GOING TO BE RELEVANT TO WHY --

THE COURT: OVERRULED.

MS. BARCLAY: THANK YOU, YOUR HONOR.

BY MS. BARCLAY:

Q. DO YOU HAVE EXPERIENCE WITH ALL THE OTHER FOSTER AGENCIES IN PHILADELPHIA?

A. YES, I HAVE.

Q. AND THAT WAS AS A CHILD ADVOCATE SOCIAL WORKER?

A. YES, AS A CHILD ADVOCATE SOCIAL WORKER, AS A FOSTER CARE WORKER AS WELL.

Q. WAS YOUR EXPERIENCE WITH THE OTHER AGENCIES RELEVANT TO YOUR DECISION TO CHOOSE CATHOLIC SOCIAL SERVICES?

A. ABSOLUTELY.
Q. CAN YOU EXPLAIN THAT A LITTLE BIT?
A. YES. SO WHEN I DECIDED TO BECOME A FOSTER PARENT, I --
MS. CORTES: YOUR HONOR, I WOULD OBJECT THAT THIS GOES BEYOND THE SCOPE OF THE CROSS.
MS. BARCLAY: YOUR HONOR, SHE --
THE COURT: IT DOES NOT.
THE WITNESS: WHEN I LOOKED AT BECOMING A FOSTER PARENT, I REVIEWED MY EXPERIENCE WITH OTHER AGENCIES. I ACTUALLY WENT TO OTHER AGENCIES. I WENT TO BETHANY CHRISTIAN SERVICES. I DID NOT FEEL THE SAME RELATIONSHIP THAT I HAD, EVEN THOUGH PROFESSIONALLY I HAD A RELATIONSHIP WITH BETHANY, I DID NOT FEEL THAT I WOULD HAVE THE SAME SUPPORT OR RELATIONSHIP THAT I HAD WITH CATHOLIC SOCIAL SERVICES. AND I HONESTLY DIDN'T FEEL LIKE THE CORE BELIEFS WERE THERE. IT IS A CHRISTIAN AGENCY, BUT IT WASN'T THE ONE THAT I FELT CALLED TO.
BY MS. BARCLAY:
Q. WAS THERE ALSO ANYTHING ABOUT THE SUPPORT THAT YOU ANTICIPATED YOU WOULD RECEIVE FROM CATHOLIC SOCIAL SERVICES THAT WAS RELEVANT TO YOUR DECISION?
A. YES, I KNEW THAT I WOULD RECEIVE SUPPORT THERE BECAUSE AGAIN OF MY PROFESSIONAL RELATIONSHIPS THAT I

HAD BUILT.

MS. BARCLAY: NO FURTHER QUESTIONS, YOUR HONOR.

THE COURT: ANY OTHER QUESTIONS?

MS. CORTES: NO, YOUR HONOR.

THE COURT: THANK YOU.

THE WITNESS: THANK YOU, YOUR HONOR.

THE COURT: NOW YOU MAY CALL YOUR NEXT WITNESS.

MS. BARCLAY: THE PLAINTIFFS CALL MS. CECILIA PAUL, YOUR HONOR.

(WITNESS SWORN.)

THE WITNESS: MY NAME IS CECILIA, C-E-C-I-L-I-A, PAUL, P-A-U-L.

DIRECT EXAMINATION

MS. BARCLAY:

Q. GOOD AFTERNOON, MS. PAUL.

A. GOOD AFTERNOON.

Q. CAN YOU TELL US WHAT YOUR CURRENT RELATIONSHIP IS TO CATHOLIC SOCIAL SERVICES?

A. RIGHT NOW I AM A FOSTER PARENT WITH CATHOLIC SOCIAL SERVICES, BUT HAVE NO CHILDREN BECAUSE OF THE CONDITIONS THAT ARE GOING ON RIGHT NOW.

Q. IN WHAT CITY DO YOU CURRENTLY LIVE?

A. PHILADELPHIA.

Q. HOW LONG HAVE YOU LIVED IN PHILADELPHIA?

A. MY WHOLE LIFE.

Q. CAN YOU TELL US JUST A LITTLE BIT ABOUT YOUR EDUCATIONAL BACKGROUND?

A. I HAD 16 YEARS OF CATHOLIC EDUCATION, GRADUATED FROM VILLANOVA UNIVERSITY WITH A BSN.

Q. AND DID YOU HAVE ANY WORK EXPERIENCE THAT IS RELEVANT?

A. YES. AFTER GETTING MY DEGREE, I WENT TO CHILDREN'S HOSPITAL OF PHILADELPHIA, WORKED THERE FOR TWO YEARS. THEN HAD MY OWN FAMILY AND STAYED IN THE HOME. MISSED NURSING VERY, VERY MUCH BECAUSE IT'S AN AVOCATION AND THEN HEARD ABOUT FOSTERING IN CATHOLIC SOCIAL SERVICES.

Q. LET'S TALK ABOUT YOUR TIME AS A FOSTER PARENT. HOW LONG HAVE YOU BEEN A FOSTER PARENT?

A. I HAVE BEEN A FOSTER PARENT FOR 46 YEARS.

Q. HOW MANY CHILDREN APPROXIMATELY HAVE YOU FOSTERED?

A. I HAVE FOSTERED 133 CHILDREN.

Q. DID YOU EVER ADOPT ANY OF THESE CHILDREN?

A. I HAVE ADOPTED SIX.

Q. HAVE YOU EVER BEEN RECOGNIZED FOR YOUR CARE BY THE CITY?

A. YES. THREE YEARS AGO IN MAY I RECEIVED A --

WHATEVER, A CERTIFICATE STATING THAT THEY RECOGNIZED ME AS A LOVING, CARING FOSTER PARENT.

MS. BARCLAY: AND MAY I HAVE PERMISSION TO APPROACH THE WITNESS, YOUR HONOR?

THE COURT: YES.

BY MS. BARCLAY:

Q. MS. PAUL, I HAVE HANDED YOU WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBIT 1. DO YOU RECOGNIZE THIS DOCUMENT?

A. YES, I DO.

Q. WHAT IS THIS DOCUMENT?

A. I DIDN'T HEAR WHAT YOU SAID.

Q. WHAT IS THIS DOCUMENT?

A. IT'S A DOCUMENT, A CERTIFICATE OF APPRECIATION FROM THE CITY OF PHILADELPHIA ISSUED BY DHS, THE COMMISSIONER AT THAT TIME WAS VANESSA HARLEY WHO PRESENTED IT TO ME ON MAY 26, 2015.

Q. WHAT DOES THE AWARD SAY THAT IT WAS FOR?

A. EXCUSE ME?

Q. WHAT DOES THE AWARD SAY THAT --

A. THE AWARD SAYS, FOR ANSWERING THE CALL OF OUR MOST VULNERABLE CHILDREN, FOR HELPING TO RIGHT THE WRONGS, FOR BEING A SHOULDER TO CRY ON, AND MOST IMPORTANTLY FOR PROVIDING PHILADELPHIA'S FOSTER CHILDREN WITH LOVE, COMPASSION AND RESPECT THEY DESERVE. YOU

MAKE THE DIFFERENCE IN THE LIVES OF CHILDREN AND YOUTH.

MS. BARCLAY: YOUR HONOR, MAY I HAVE PERMISSION TO ENTER THIS AS EXHIBIT 1 FOR THE PLAINTIFFS INTO THE RECORD?

THE COURT: YES.

BY MS. BARCLAY:

Q. MS. PAUL, WHAT INFLUENCED YOUR DECISION TO BECOME A FOSTER PARENT?

A. HAVING THE CATHOLIC BACKGROUND, I CHOSE CATHOLIC SOCIAL SERVICES FOR THE CARING THAT THEY GIVE CHILDREN, FOR THE COMMITMENT THEY GIVE CHILDREN, AND THE BELIEFS THAT I BELIEVE IN AND THEY DO TOO.

Q. WHAT INFLUENCED YOUR DECISION TO BECOME A FOSTER PARENT, GENERALLY?

A. BECAUSE I FEEL THAT I HAVE BEEN GIVEN A GIFT FROM GOD TO HELP CHILDREN AND CARE FOR THEM AND LOVE THEM ALONG WITH MY OWN CHILDREN WHO ALSO ACCEPT THEM AND LOVE THEM.

Q. IN ADDITION TO YOUR -- YOU MENTIONED EARLIER THAT YOU HAD A PEDIATRIC NURSING BACKGROUND. WAS THAT RELEVANT AT ALL?

A. CERTAINLY, BECAUSE I HAD A LOT OF TRAINING WITH CHILDREN, ESPECIALLY AT CHILDREN'S HOSPITAL, AND WANTED TO KEEP THAT GOING. EVEN THOUGH I COULDN'T DO IT ON A PROFESSIONAL LEVEL AS A NURSE IN A HOSPITAL, I COULD DO

IT IN MY HOME.

Q. CAN YOU TELL US ABOUT THE TYPE OF SUPPORT YOU RECEIVED FROM CATHOLIC SOCIAL SERVICES?

A. THE KIND OF SUPPORT I RECEIVED FROM THEM IS EXCELLENT. THEY ARE ALWAYS THERE FROM -- FOR ME NO MATTER WHAT KIND OF QUESTION I MIGHT HAVE, THEY ARE ALWAYS THERE TO ANSWER AND CARE -- YOU KNOW, COME OUT. IF I NEED THEIR HELP FACE-TO-FACE OR ON THE PHONE, THEY ARE THERE.

Q. ARE YOU CURRENTLY RECEIVING NORMAL REFERRALS FOR FOSTER CHILDREN?

A. NO.

Q. WHEN DID THE LAST FOSTER CHILD LEAVE YOUR HOME?

A. IN EARLY APRIL.

Q. SO YOU HAVE NOT RECEIVED ANY NORMAL FOSTER CARE REFERRALS SINCE APRIL?

A. NO REFERRALS, NO.

Q. HAVE YOU EVER GONE WITHOUT FOSTER CARE REFERRALS FOR THIS LONG?

A. NOT USUALLY, NO.

Q. HOW HAVE YOU FELT NOT BEING ABLE TO CARE FOR FOSTER CHILDREN?

A. I FEEL VERY LOST, VERY LOST BECAUSE I CAN'T USE THE TALENT THAT WAS GIVEN TO ME TO HELP WITH THESE CHILDREN WHO ARE OUT THERE, MAINLY INFANTS THAT I GET

WHO ARE DRUG ADDICTED, WHO COME INTO MY HOME AND NEED A LOT OF CARE, WHICH I AM MORE THAN HAPPY TO GIVE, AND MY FAMILY ALSO IS INVOLVED IN GIVING, AND NOT ABLE TO DO IT LEAVES ME VERY UPSET.

Q. HAVE YOU EVER FOSTERED TEEN CHILDREN IN THE PAST?

A. YES, I HAVE.

Q. ARE YOU INTERESTED IN FOSTERING ANY ADDITIONAL CHILDREN IN THE FUTURE?

A. I AM, YES.

Q. HOW WOULD IT IMPACT YOU IF CATHOLIC SOCIAL SERVICES HAD TO CLOSE ITS FOSTER CARE PROGRAM?

A. I WOULD REALLY HAVE TO GIVE IT A LOT OF THOUGHT. I DON'T KNOW WHETHER I COULD BE ABLE TO GO TO ANOTHER AGENCY. THEY ARE LIKE FAMILY TO ME, CATHOLIC SOCIAL SERVICES. AND THAT'S HARD TO START OVER AGAIN AND HAVE THAT FEELING THAT I HAVE FOR THEM.

Q. HOW DO YOU THINK YOU WOULD BE AFFECTED BY THE LOSS OF SERVICES THAT YOU RELY ON?

A. FROM CATHOLIC SOCIAL SERVICES YOU MEAN?

Q. YES.

A. I DON'T KNOW. I DON'T WHAT KIND OF SERVICE I COULD RECEIVE FROM OTHER AGENCIES BECAUSE I DON'T KNOW -- YOU KNOW, OTHER AGENCIES. THIS IS THE ONLY ONE I HAVE EVER WORKED WITH.

Q. WOULD IT BE A LOSS TO YOU THE RELATIONSHIPS THAT YOU HAVE?

A. IF I WOULD CHOOSE -- YES, IT IS, JUST TO END IT, THAT'S AN ENDING AND THAT WOULD BE VERY, VERY HARMFUL.

MS. BARCLAY: NO FURTHER QUESTIONS, YOUR HONOR.

THE COURT: CROSS-EXAMINE

MS. CORTES: NO QUESTIONS.

THE COURT: OKAY. THANK YOU, MA'AM, YOU MAY STEP DOWN.

THE WITNESS: THANK YOU.

MS. BARCLAY: PLAINTIFFS WOULD LIKE TO CALL MRS. SHARONELL FULTON TO THE STAND.

MS. CORTES: YOUR HONOR, I WOULD LIKE TO ASK FOR AN OFFER OF PROOF AT THIS POINT.

THE COURT: CAN YOU PROVIDE COUNSEL WITH A PRIVATE OFFER?

(BRIEF PAUSE IN THE PROCEEDING.)

THE COURT: ARE WE READY TO PROCEED?

MS. BARCLAY: YES, YOUR HONOR.

(WITNESS SWORN.)

THE WITNESS: MY NAME IS SHARONELL, S-H-A-R-O-N-E-L-L, LAST NAME FULTON, F-U-L-T-O-N.

DIRECT EXAMINATION

BY MS. BARCLAY:

Q. MS. FULTON, WHAT IS YOUR CURRENT RELATIONSHIP TO CATHOLIC SOCIAL SERVICES?

A. I AM CURRENTLY A FOSTER PARENT WITH CATHOLIC SOCIAL SERVICES.

Q. AND WHAT CITY DO YOU CURRENTLY LIVE?

A. PHILADELPHIA.

Q. AND HOW LONG HAVE YOU LIVED THERE?

A. MOST OF MY LIFE.

Q. HOW LONG HAVE YOU BEEN A FOSTER PARENT?

A. FOR 26 YEARS.

Q. AND HOW MANY CHILDREN HAVE YOU FOSTERED OVER THE YEARS?

A. 40.

Q. HOW DID YOUR RELIGIOUS BELIEFS IF AT ALL MOTIVATE YOUR DESIRE TO BECOME A FOSTER PARENT?

A. WELL, I STARTED THINKING ABOUT IT IN THE EARLY '90'S AND I KEPT SEEING THE COMMERCIAL. SO BECAUSE I AM CATHOLIC, I WENT TO CHURCH AND I PRAYED ABOUT IT AND I BELIEVE THAT IT WAS MY FAITH THAT LED ME TO IT.

Q. WHAT LED YOU TO CHOOSE CATHOLIC SOCIAL SERVICES AS THE AGENCY THAT YOU WORK WITH?

A. WELL, BECAUSE I WENT TO CHURCH, I GO TO A CATHOLIC CHURCH AND I HAVE FOR 55 YEARS, SO I DECIDED THAT I WOULD START THERE BECAUSE THEY SHARE THE VALUES. I SHARE THE SAME VALUES.

Q. CAN YOU TELL US A LITTLE BIT ABOUT, ASIDE FROM THE SHARED VALUES, SOME OF THE SUPPORT THAT YOU RECEIVE FROM CATHOLIC SOCIAL SERVICES?

A. WELL, WHEN I BECAME A FOSTER PARENT IN 1992, IT WAS A LOT DIFFERENT THAN IT IS TODAY. THE SUPPORT WAS THERE, IT WAS LIKE FAMILY. WHENEVER I HAD A PROBLEM, AND YOU WILL HAVE PROBLEMS, I WAS ABLE TO CALL ANY HOUR OF THE NIGHT. MRS. FULTON, YES. THIS IS HAPPENING, THAT IS HAPPENING, HOW AM I SUPPOSED TO HANDLE THIS, CHILDREN WANTING TO KILL ONE ANOTHER AND VARIOUS DIFFERENT PROBLEMS. I ALWAYS GOT THE SUPPORT THAT I NEEDED, AND THE RESPECT.

Q. WHAT SORT OF TRAINING HAVE YOU RECEIVED FROM CATHOLIC SOCIAL SERVICES THAT HAS HELPED YOU ADDRESS SPECIAL NEEDS OF CHILDREN YOU CARE FOR?

A. THEY ALWAYS OFFER IN-SERVICES THAT -- IT WAS MANDATORY THAT WE TAKE AND THEY TRY TO SCHEDULE EDUCATORS TO COME IN TO ADDRESS SOME OF THE MANY PROBLEMS THAT THE FOSTER PARENT WAS HAVING.

Q. ARE YOU INTERESTED IN FOSTERING MORE CHILDREN IN THE FUTURE?

A. YES.

Q. ARE YOU CURRENTLY CARING FOR ANY FOSTER CHILDREN?

A. YES. I HAVE A BROTHER AND SISTER, 4 AND 5 YEARS

OLD, THAT HAVE BEEN WITH ME FOR NINE MONTHS.

Q. ARE THERE THINGS THAT CATHOLIC SOCIAL SERVICES DOES TO HELP YOU CARE FOR THE SPECIAL NEEDS OF THESE CHILDREN?

A. ABSOLUTELY. THEY SUPPORT ME, THEY PROVIDE ME WITH RESOURCES, THEY PUSH ME IN THE DIRECTION WHERE I CAN GET ADDITIONAL EDUCATION, AND THEY VISIT OFTEN.

Q. HAVE YOU EVER RECEIVED TRAINING FROM ANOTHER AGENCY?

A. YES. SOME YEARS AGO I RECEIVED SERVICE FROM THE DHS. THEY CALLED US ALL IN AND WE WENT IN FOR AN IN-SERVICE THERE, AND I FELT VERY SAD BECAUSE THE FIRST THING THE INSTRUCTOR SAID WAS, KEEP IN MIND THAT THESE ARE NOT YOUR CHILDREN, YOU ARE JUST A SURROGATE. AND I FELT THAT WAS VERY COLD TO START THE DAY BECAUSE I THOUGHT OF MYSELF OF A LITTLE MORE THAN WHAT SHE WAS PROJECTING.

Q. HOW IF AT ALL DID THAT COMPARE WITH HOW SOCIAL WORKERS AT CATHOLIC TREAT YOU?

A. WELL, I KNOW THIS, WHEN WE HAVE SERVICES THERE, WE START WITH PRAYER. AND TO ME THAT SETS THE PLATFORM FOR A GOOD START.

Q. AND WHAT SORT OF RELATIONSHIPS DO YOU HAVE WITH THE SOCIAL WORKERS AT CATHOLIC SOCIAL SERVICES?

A. I CARE ABOUT ALL OF THEM.

Q. HOW DO THEY TREAT YOU?

A. GOOD. GOOD. IT'S A FAMILY AFFAIR.

Q. DOES ANYONE YOU KNOW WORK WITH OTHER AGENCIES?

A. I KNOW MANY OTHER FOSTER PARENTS FOR BELONGING TO PIN, PARENT INVOLVED NETWORK, AND THEY DON'T HAVE THE SAME --

MS. CORTES: OBJECTION, YOUR HONOR, SPECULATION.

THE COURT: SUSTAINED.

MS. CORTES: LACK OF PERSONAL KNOWLEDGE. I ASK THAT HER ANSWER BE STRICKEN.

THE COURT: IT IS STRICKEN.

MS. BARCLAY: YOUR HONOR, THIS NOT BEING OFFERED FOR THE TRUTH OF THE MATTER, BUT FOR THE INFLUENCE IT IS GOING TO HAVE ON MS. FULTON AND HER DECISIONS MOVING FORWARD AS FAR AS WHAT SHE CAN DO AS A FOSTER PARENT.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. HOW WOULD YOU BE IMPACTED IF CATHOLIC SOCIAL SERVICES HAD TO CLOSE ITS PROGRAM?

A. I HAVE BEEN THINKING ABOUT THIS AND I DON'T KNOW. I WOULD BE DEVASTATED.

Q. HOW DO YOU THINK THE CHILDREN IN YOUR CARE COULD BE IMPACTED IF CATHOLIC SOCIAL SERVICES HAD TO CLOSE THE

FOSTER PROGRAM?

MS. CORTES: OBJECTION, YOUR HONOR. SPECULATION, LACK OF PERSONAL KNOWLEDGE. SHE IS ASKING ABOUT --

THE COURT: I THINK SHE CAN ANSWER AS TO WHAT MIGHT PHYSICALLY HAPPEN, BUT ANY KIND OF EMOTIONAL IMPACT SHE CAN'T ANSWER.

MS. BARCLAY: IF I COULD PROFFER WHAT SHE WOULD TALK ABOUT. SHE WAS GOING TO TALK ABOUT WHAT SHE UNDERSTANDS HER THERAPIST HAS SAID ABOUT WHAT THE IMPACT WOULD BE THE CHILDREN.

MS. CORTES: OBJECTION, YOUR HONOR.

THE COURT: SUSTAINED.

MS. BARCLAY: AND ALSO A TIME IN THE PAST IMPACT, YOUR HONOR, THAT WE WILL DISCUSS AS FAR AS THE EFFECT ON CHILDREN.

THE COURT: I AM SUSTAINING THE OBJECTION.

BY MS. BARCLAY:

Q. WHAT YOU UNDERSTAND TO BE THE PHYSICAL IMPACT ON THE CHILDREN IN YOUR CARE IF CATHOLIC SOCIAL SERVICES CLOSED ITS PROGRAM?

A. WELL, THE TWO CHILDREN THAT I HAVE NOW WOULD BE GREATLY IMPACTED BECAUSE WHEN I GOT THESE TWO LITTLE SISTER AND BROTHER, THEY DIDN'T TRUST, THEY WOULD NOT

EAT, IT WAS AWAY FROM THEIR ORDINARY TO BE PLACED WITH ME, BUT I HAD TO GAIN THEIR TRUST. I HAD --

THE COURT: THEY WOULD END UP MOVING?

THE WITNESS: YES, THEY WOULD END UP MOVING.

BY MS. BARCLAY:

Q. WAS THERE A TIME IN THE PAST WHEN YOU WERE WORRIED THAT ONE OF THE CHILDREN IN YOUR CARE MAY END UP MOVING?

A. YES.

Q. WAS THERE ANY DIFFICULTY IN FINDING A POTENTIAL PLACEMENT FOR HIM?

A. THERE WAS DIFFICULTY. I WAS TOLD THAT THEY DID NOT HAVE A PLACEMENT FOR HIM AND YOU NORMALLY HAVE TO GIVE 30 DAYS AND IT HAS BEEN SIX MONTHS.

Q. SO AFTER SIX MONTHS THE CITY WAS NOT AWARE OF ANY OTHER POTENTIAL PLACEMENT FOR THIS CHILD?

A. NO.

MS. BARCLAY: NO FURTHER QUESTIONS, YOUR HONOR.

THE COURT: CROSS-EXAMINE.

MS. CORTES: VERY BRIEFLY, YOUR HONOR.

CROSS-EXAMINATION

BY MS. CORTES:

Q. GOOD AFTERNOON, MS. FULTON.

A. GOOD AFTERNOON.

Q. MS. FULTON, YOU MENTIONED THAT YOU WERE AT A DHS TRAINING?

A. YES.

Q. CAN YOU TELL US WHAT YEAR THAT WAS?

A. NOT REALLY. I WOULD SAY MORE THAN TEN YEARS AGO.

Q. AND I TAKE IT THAT IF YOU -- IF IT WAS THAT LONG AGO, YOU CANNOT TELL US WHAT PARTICULAR AGENCY WAS THE TRAINING AGENCY?

A. IT WAS THROUGH DHS AND IT WAS AT THEIR HEADQUARTERS AT THAT TIME.

Q. AND THAT'S ALL THE INFORMATION YOU CAN GIVE US?

A. WELL, IT WAS ABOUT UNDERSTANDING OUR POSITION AS A FOSTER PARENT, AS I BELIEVE. AND THERE WERE MANY OTHER FOSTER PARENTS THERE FROM ALL OVER THE CITY FOR THAT PARTICULAR TRAINING. AND AS I SAID EARLIER, THE INSTRUCTOR STARTED OUT WITH MORE OR LESS DISCIPLINING US AND SAYING, JUST REMEMBER, THEY ARE NOT YOUR CHILDREN, YOU ARE ONLY SURROGATES, AND I HONESTLY FELT SAD ABOUT THAT.

MS. CORTES: OKAY. COURT'S INDULGENCE.

(BRIEF PAUSE IN THE PROCEEDING.)

MS. CORTES: NO FURTHER QUESTIONS.

THE COURT: THANK YOU, MA'AM.

THE WITNESS: THANK YOU.

MS. BARCLAY: NOTHING FURTHER FROM THE PLAINTIFFS, YOUR HONOR.

THE COURT: OKAY. DOES THE CITY HAVE ANY WITNESSES?

MR. FIELDS: WE DO, YOUR HONOR, BUT BEFORE WE GET TO OUR WITNESSES, WE MOVE TO EXCLUDE THE AFFIDAVITS OF BISHOP MCINTYRE, FROM JIM AMATO, JAMES AMATO, AND THE AFFIDAVIT OF JAMES BLACK THAT WAS FILED LATE LAST WEEK. THERE ARE A MYRIAD OF DISPUTED FACTS IN THOSE AFFIDAVITS AS WELL AS AVERMENTS THAT WE HAVE A RIGHT TO INQUIRE INTO.

THE COURT: OKAY, WE ARE GOING TO TAKE A BRIEF RECESS, JUST ABOUT FIVE MINUTES. AND THEN WE WILL COME BACK.

(BRIEF RECESS.)

THE COURT: OKAY, YOU MAY BE SEATED.

BEFORE WE BROKE THERE WAS A MOTION. CAN YOU REPEAT THE MOTION, PLEASE?

MR. FIELD: SO I WAS MOVING TO EXCLUDE THE AFFIDAVITS OF BISHOP MCINTYRE, JAMES AMATO AND JAMES BLACK AS THERE ARE DISPUTED FACTS IN THOSE AND WE HAVE NOT HAD AN OPPORTUNITY TO CROSS-EXAMINE THE WITNESSES.

MS. WINDHAM: YOUR HONOR, WITH REGARD TO THE DECLARATIONS, THIS COURT HAS SET A NARROW TIME

WINDOW FOR THE HEARING. I BELIEVE THERE ARE AT LEAST SEVEN DIFFERENT WITNESSES WHO HAVE SUBMITTED DECLARATIONS ON THIS CASE. IF THE COURT WANTS TO CARRY THIS HEARING OVER TO TOMORROW TO ALLOW ALL OF THOSE WITNESSES, THAT'S SOMETHING THAT WE ARE HAPPY TO DO. HOWEVER, I WOULD ALSO NOTE THAT FEDERAL RULES OF EVIDENCE 65(B)(1)(A) SPECIFICALLY CONTEMPLATES EVIDENCE COMING IN THROUGH AFFIDAVITS, JUST AS WE HAVE DONE HERE, ON A TEMPORARY RESTRAINING ORDER. I ALSO NOTE THE 3RD CIRCUIT'S DECISION IN KOS PHARMACY V. ANDRX CORP., 369 F.3D 700, WHICH SAYS A PRELIMINARY INJUNCTION IS CUSTOMARILY GRANTED ON THE BASIS OF PROCEDURES THAT ARE LESS FORMAL AND EVIDENCE LESS COMPLETE THAN A TRIAL ON THE MERITS. THE CITY HAS HAD AMPLE OPPORTUNITY TO OFFER ARGUMENTS AND OFFER ITS OWN WITNESSES. WE SEE NO REASON TO EXCLUDE THE DECLARATIONS HERE.

THE COURT: THE COURT HAS NO PROBLEM WITH CARRYING OVER THIS MATTER SO THAT THE WITNESSES CAN TESTIFY UNDER THE CIRCUMSTANCES. SO YOU CAN MAKE A CHOICE. EITHER WE HAVE THE WITNESSES TESTIFY OR THE AFFIDAVITS WILL BE EXCLUDED.

MS. WINDHAM: YOUR HONOR, WE ARE HAPPY TO CARRY OVER.

THE COURT: OKAY.

MS. WINDHAM: WE NEED TO CHECK WITH THE

WITNESSES TO SEE WHEN WE WOULD BE ABLE TO HAVE THEM HERE FOR THE COURT.

THE COURT: OKAY. MY INTENTION IS TO RESUME AT 1 O'CLOCK TOMORROW. I HAVE OTHER CASES SCHEDULED, BUT I WILL MOVE THEM AROUND SO THAT WE CAN FINISH THIS MATTER.

ARE THERE ANY WITNESSES THAT CAN BE CALLED AT THIS POINT BY THE CITY SINCE THEY ARE HERE? I UNDERSTAND THEY WILL BE OUT OF TURN, BUT...

MS. OLIVER: YES, YOUR HONOR.

THE COURT: OKAY. CALL YOUR WITNESS.

MS. OLIVER: THANK YOU, YOUR HONOR. GOOD AFTERNOON. I CALL KIMBERLY ALI.

(WITNESS SWORN.)

THE WITNESS: MY NAME IS KIMBERLY ALI, K-I-M-B-E-R-L-Y, A-L-I.

DIRECT EXAMINATION

BY MS. OLIVER:

Q. GOOD AFTERNOON, MS. ALI.

A. GOOD AFTERNOON.

Q. WHERE ARE YOU EMPLOYED?

A. I AM EMPLOYED AT THE PHILADELPHIA DEPARTMENT OF HUMAN SERVICES.

Q. AND WHAT IS YOUR CURRENT POSITION?

A. I AM DEPUTY COMMISSIONER FOR CHILD WELFARE

OPERATIONS.

Q. TURNING TO YOUR EDUCATIONAL BACKGROUND, WILL YOU PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND FOR THE COURT?

A. YES. I HAVE A BACHELOR'S DEGREE IN CRIMINAL JUSTICE FROM TEMPLE UNIVERSITY. I HAVE A MASTER'S DEGREE IN SOCIAL WORK FROM TEMPLE UNIVERSITY, AND I AM ALSO A LICENSED SOCIAL WORKER.

Q. WHEN DID YOU BEGIN YOUR EMPLOYMENT WITH THE DEPARTMENT OF HUMAN SERVICES?

A. IN JANUARY OF 2000.

Q. AND WHAT POSITION DID YOU HOLD THEN?

A. I WAS A SOCIAL WORKER IN THE ONGOING SERVICE REGION. AS A SOCIAL WORKER IN THAT REGION, I WAS RESPONSIBLE FOR SERVICING FAMILIES THAT RECEIVED BOTH IN-HOME SERVICES OR PLACEMENT SERVICES.

Q. AND THEREAFTER, DID YOU HOLD ANY OTHER POSITIONS WITH THE DEPARTMENT?

A. YES. IN 2002 I BECAME A SUPERVISOR AT THE DEPARTMENT OF HUMAN SERVICES IN THE ONGOING SERVICE REGION. I WAS RESPONSIBLE FOR SUPERVISING FIVE SOCIAL WORKERS WHO IN TURN WORKED WITH FAMILIES THAT RECEIVED IN-HOME SERVICES AS WELL AS PLACEMENT SERVICES.

Q. AND HAVE YOU HELD ANY OTHER POSITIONS WITHIN THE DEPARTMENT OF HUMAN SERVICES?

A. YES. FOUR YEARS LATER I WAS PROMOTED TO HUMAN SERVICES PROGRAM ADMINISTRATOR FROM THE CENTRAL REFERRAL UNIT AT DHS. IN THAT CAPACITY I WAS RESPONSIBLE FOR A SECTION WHO IDENTIFIED BOTH IN-HOME SERVICES FOR FAMILIES AS WELL AS PLACEMENT FOR CHILDREN AND YOUTH.

Q. AND AFTER THAT DID YOU HOLD ANY OTHER POSITIONS?

A. I DID. IN 2009 I WAS PROMOTED TO DIRECTOR OF PROVIDER RELATIONS AND EVALUATION OF PROGRAMS AT DHS. I WAS RESPONSIBLE FOR ABOUT 30 PROGRAM ANALYSTS AS WELL AS SUPERVISORS WHO WERE RESPONSIBLE FOR EVALUATING AND MONITORING PROVIDERS OVER -- APPROXIMATELY OVER 200 PROJECTED PROVIDERS, DELINQUENT PROVIDERS, DEPENDENT PROVIDERS AS WELL AS PREVENTION PROVIDERS.

Q. AND BY THE WAY, SINCE YOUR FIRST POSITION AS A SOCIAL WORKER, WERE ALL OF THESE SUBSEQUENT POSITIONS PROMOTIONS THAT YOU RECEIVED?

A. YES, THEY WERE.

Q. AND WHAT IS THE NEXT PROMOTION THAT YOU RECEIVED?

A. IN 2010 I BECAME THE OPERATION DIRECTOR FOR THE CHILDREN AND YOUTH DIVISION AT DHS. IN THAT CAPACITY I WAS RESPONSIBLE FOR CASES FROM THE HOTLINE, SO ALL CHILD ABUSE AND NEGLECT REPORTS THAT CAME IN THROUGH THE HOTLINE UP UNTIL CASES WERE CLOSED OUT THROUGH THE DEPARTMENT.

Q. DID YOU RECEIVE ANY OTHER PROMOTIONS?

A. YES. IN 2014 I BECAME THE CHIEF IMPLEMENTATION OFFICER FOR THE DEPARTMENT OF HUMAN SERVICES FOR IMPROVING OUTCOMES FOR CHILDREN. I WAS RESPONSIBLE FOR HELPING THE COMMUNITY UMBRELLA AGENCIES, OR CUA'S, BEGIN TO RECEIVE THEIR SERVICES.

Q. MAY I STOP YOU FOR A MOMENT AND ASK YOU TO EXPLAIN TO THE COURT THE TERM THAT YOU JUST USED, IMPROVING OUTCOMES FOR CHILDREN?

A. YES. IMPROVING OUTCOMES FOR CHILDREN IS A SYSTEM TRANSFORMATION THAT THE DEPARTMENT UNDERTOOK IN 2012 IN WHICH WE SEPARATED THE CITY INTO TEN GEOGRAPHICAL AREAS. WE ISSUED AN RFP BECAUSE WE WANTED COMMUNITY-BASED PROVIDERS TO PROVIDE CASE MANAGEMENT SERVICES TO FAMILIES. AT THAT PARTICULAR TIME, PRIOR TO IMPROVING OUTCOMES FOR CHILDREN, WE HAD A DUAL CASE MANAGEMENT SYSTEM IN WHICH EVERY FAMILY HAD A DHS SOCIAL WORKER AND A PROVIDER SOCIAL WORKER. WE FELT THAT IT CAUSED A LOT OF CONFUSION FOR FAMILIES, SO WE MOVED TO A SINGLE CASE MANAGEMENT SYSTEM IN 2013 IN WHICH FAMILIES RECEIVED ONE CUA -- COMMUNITY UMBRELLA AGENCY CASE MANAGER AS WELL AS WE DEVELOPED ONE SINGLE CASE PLAN FOR FAMILIES.

Q. AND SO ESSENTIALLY THAT STREAMLINED THE PROCESS FOR FAMILIES?

A. YES, IT DID.

Q. DID YOU HAVE ANY OTHER DUTIES AS THE CHIEF IMPLEMENTATION OFFICER FOR IMPROVING OUTCOMES FOR CHILDREN?

A. THE MAIN -- MY MAIN RESPONSIBILITY DURING THAT TIME WAS TO ENSURE THAT CASES THAT CAME INTO THE FRONT DOOR, IF THEY WERE ACCEPTED FOR SERVICES THROUGH THE DEPARTMENT OF HUMAN SERVICES, THAT THEY WENT DIRECTLY TO THE COMMUNITY UMBRELLA AGENCY SO THEY COULD PROVIDE CASE MANAGEMENT SERVICES. ADDITIONALLY, WE HAD A NUMBER OF CASES THAT WERE STILL IN OUR ONGOING SERVICE REGION. I SUPERVISED TWO UNITS THAT WERE RESPONSIBLE FOR LOOKING AT EACH CASE INDIVIDUALLY TO TRY TO DETERMINE THE NEEDS OF THE CHILD AND THE FAMILY. IF THE CHILD AND THE FAMILY CONTINUED TO NEED SERVICES THROUGH THE DEPARTMENT OF HUMAN SERVICES, THEN WE TRANSFERRED THOSE CASES OVER TO THE COMMUNITY UMBRELLA AGENCY. ANY CHILD WHO WAS ABOUT TO ACHIEVE PERMANENCY, WE KEPT IT AT THE DEPARTMENT OF HUMAN SERVICES SO THAT WE COULD ASSURE THAT PERMANENCY WAS ACHIEVED FOR THAT CHILD.

Q. AND JUST VERY BRIEFLY, WHEN YOU REFERRED TO PERMANENCY, WHAT ARE YOU REFERRING TO?

A. I AM REFERRING TO GOALS FOR CHILDREN AND YOUTH. ANY CHILD OR YOUTH THAT COME INTO PLACEMENT WITH THE DEPARTMENT IN WHICH THE DEPARTMENT OF HUMAN SERVICES HAS

LEGAL CUSTODY OF THAT CHILD, WE ESTABLISH A GOAL FOR THAT PARTICULAR CHILD. THE GOAL CONSISTS OF REUNIFICATION, THAT MEANS RETURNING A YOUNG PERSON TO THAT PARTICULAR FAMILY. IF REUNIFICATION CANNOT OCCUR, THEN THE NEXT HIERARCHY IN TERMS OF GOAL IS ADOPTION. SO IDENTIFYING APPROPRIATE ADOPTIVE RESOURCES FOR THAT CHILD OR YOUTH, AND THEN THE THIRD HIERARCHY IS PERMANENT LEGAL CUSTODIANSHIP.

Q. THANK YOU.

WILL YOU TALK A LITTLE BIT ABOUT THE STRUCTURED LEVEL OF CARE INSTRUMENT?

A. YES. UNDER MY LEADERSHIP AS THE CHIEF IMPLEMENTATION OFFICER AT THE DEPARTMENT OF HUMAN SERVICES, WE DEVELOPED -- WITH THE SUPPORT OF CASEY FAMILY PROGRAMS, WE DEVELOPED A STRUCTURED LEVEL OF TOOL INSTRUMENT. WHAT THAT INSTRUMENT IS USED FOR IS TO DETERMINE THE APPROPRIATE LEVEL OF CARE FOR A CHILD OR A YOUTH. IN DOING SO, WE GATHER REFERRAL INFORMATION THAT IS COMPLETED BY THE CUA CASE MANAGER OR THE DHS SOCIAL WORKER, WE IN PARTNERSHIP WITH COMMUNITY BEHAVIORAL HEALTH, WHO IS OUR MANAGED CARE ORGANIZATION FOR THE CITY OF PHILADELPHIA. THEY ARE ACTUALLY CO-LOCATED AT, DHS IN THE CENTRAL REFERRAL UNIT AT DHS. THEY WILL REVIEW THE CHILD'S BEHAVIORAL HEALTH HISTORY. WE HAVE DHS SCREENING SOCIAL WORKERS AT THE CENTRAL REFERRAL

UNIT THAT WILL GATHER THE INFORMATION FROM COMMUNITY BEHAVIORAL HEALTH AS WELL AS INFORMATION ON THE REFERRAL AS WELL AS INTERVIEWING THE DHS SOCIAL WORKER WITH THE CUA SOCIAL WORKER TO GATHER AND ASK STRUCTURED QUESTIONS SO THAT WE CAN DETERMINE THE APPROPRIATE LEVEL OF CARE FOR A CHILD OR YOUTH. WHAT I MEAN BY APPROPRIATE LEVEL OF CARE, CHILDREN CAN BE PLACED IN GENERAL FOSTER CARE OR GENERAL KINSHIP. THAT MEANS THEY WILL BE PLACED IN A FAMILY-LIKE SETTING AND THEY DON'T HAVE ANY SPECIAL NEEDS. WE ALSO HAVE SPECIALIZED BEHAVIOR HEALTH FOR TREATMENT IN FOSTER CARE, WHAT A YOUNG PERSON NEEDS, THERAPEUTIC INTERVENTION, THEY MAY BE ON SOME TYPE OF MEDICATION, OR MAYBE RECEIVING OUTPATIENT THERAPY, THEIR MEDICAL FOSTER CARE BECAUSE OF MEDICAL NEEDS AND THEN WE HAVE CONGREGATE CARE AS WELL.

Q. SO IT'S IMPORTANT TO IDENTIFY A PLACEMENT THAT IS MOST APPROPRIATE FOR EACH CHILD?

A. YES.

Q. AND IS IT THE GOAL OF YOUR AGENCY TO TRY TO PLACE CHILDREN IN THE LEAST RESTRICTIVE SETTING?

A. ABSOLUTELY.

Q. AFTER YOU WERE THE CHIEF IMPLEMENTATION OFFICER FOR IMPROVING OUTCOMES FOR CHILDREN, WHAT POSITION DID YOU HOLD?

A. SO OCTOBER 2016, I WAS PROMOTED TO DEPUTY

COMMISSIONER OF CHILD WELFARE OPERATIONS AT THE DEPARTMENT, IN WHICH I WAS RESPONSIBLE FOR BOTH THE DEPARTMENT HUMAN SERVICES, SO INTERNAL DIVISIONS AT THE DEPARTMENT OF HUMAN SERVICES CHILD WELFARE AS WELL AS THE COMMUNITY UMBRELLA AGENCY.

Q. AND YOUR POSITION AS DEPUTY COMMISSIONER OF CHILD WELFARE OPERATIONS, THAT'S OBVIOUSLY A HIGH LEVEL LEADERSHIP POSITION, CORRECT?

A. YES.

Q. AND YOU HAVE THE AUTHORITY TO MAKE DECISIONS ON BEHALF OF THE AGENCY, IS THAT CORRECT?

A. YES.

Q. TURNING YOUR ATTENTION TO FOSTER CARE GENERALLY IN PENNSYLVANIA, WILL YOU PLEASE EXPLAIN TO THE COURT HOW MANY FOSTER CARE AGENCIES -- HOW THE FOSTER CARE SYSTEM WORKS IN PENNSYLVANIA?

A. SO THE FOSTER CARE SYSTEM WORKS -- THE PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES GIVES FOSTER CARE AGENCIES THE AUTHORITY TO EITHER APPROVE, DISAPPROVE OR PROVISIONALLY APPROVE FOSTER PARENTS. A FOSTER PARENT WOULD CONTACT A PARTICULAR -- CONTACT THE PARTICULAR AGENCY ON THEIR OWN BECAUSE THEY ARE INTERESTED IN BECOMING A FOSTER PARENT. IN DOING --

Q. EXCUSE ME, MS. ALI, MAY I INTERRUPT YOU FOR A MOMENT BECAUSE THAT IS ACTUALLY NOT WHAT I WAS INQUIRING

OF YOU.

SO STATE LAW REQUIRES HOW MANY CHILDREN -- EACH AGENCY, SUCH AS DHS, IT MANDATES THAT THEY ARE RESPONSIBLE FOR PROVIDING SERVICES TO CHILDREN WHO HAVE BEEN ABUSED OR NEGLECTED OR WHO ARE IN NEED OF ANY IN-HOME SERVICES, CORRECT?

A. YES.

Q. AND DHS DOES THAT HOW?

A. HOW DHS DOES THAT IS DHS WILL DO AN INVESTIGATION. SO WE WILL GET A REPORT INTO OUR HOTLINE, WE WILL DO AN INVESTIGATION BASED ON THE ALLEGATIONS IN THE REPORT. DURING THE COURSE OF OUR INVESTIGATION IF WE DETERMINE THAT A YOUNG PERSON THAT THERE IS PRESENT DANGER OR ACTIVE SAFETY THREAT IN A PARTICULAR HOME IN WHICH WE CANNOT MITIGATE, THEN WE WOULD SEEK AN ORDER OF PROTECTIVE CUSTODY IN ORDER TO REMOVE THE YOUNG PERSON FROM HIS OR HER HOME.

Q. NOW, AFTER THE DEPARTMENT REMOVES A CHILD FROM THE HOME, HOW DOES THE DEPARTMENT GO ABOUT LOCATING AN ALTERNATIVE HOME FOR THAT CHILD?

A. SO THE DHS INVESTIGATING SOCIAL WORKER UPON REMOVAL WILL COMPLETE A REFERRAL. THAT REFERRAL GOES OVER TO OUR CENTRAL REFERRAL UNIT ELECTRONICALLY AS WELL AS TO OUR COMMUNITY UMBRELLA AGENCY ELECTRONICALLY.

Q. PRIOR TO THAT REFERRAL, IS THERE AN ATTEMPT TO

PLACE CHILDREN WITH A KIN?

A. YES. SO THEY STILL NEED A REFERRAL, SO THE FIRST QUESTION THAT WE WOULD ASK OF CARE A PARENT, THE CHILD IF THE CHILD IS AN APPROPRIATE AGE IS WHETHER OR NOT THERE IS AN APPROPRIATE KINSHIP CARE GIVER OR WHO IS IN YOUR FAMILY OR WHO DO YOU KNOW IN TERMS OF A FRIEND, IS THERE A COACH, IS THERE A TEACHER IN WHICH WE CAN PLACE THE YOUNG PERSON WITH SOMEONE THAT THEY KNOW VERSUS PLACING THEM IN FOSTER CARE. IF THE FAMILY OR THE CHILD IS ABLE TO IDENTIFY A POTENTIAL FAMILY MEMBER, DHS INVESTIGATIVE SOCIAL WORKER COMPLETES EMERGENCY CLEARANCES IN WHICH WE GET THE SAME DAY. THOSE CLEARANCES WILL BE A CHILD ABUSE CLEARANCE TO MAKE SURE THERE IS NO ABUSE OR NEGLECT. WE COMPLETE AN ONLINE STATE CRIMINAL CLEARANCE TO MAKE SURE THERE ARE NO CRIMINAL ACTIVITIES OR NO PROHIBITED OFFENSES THAT WILL BAR THE PERSON FROM BECOMING A KINSHIP CARE GIVER. WE ALSO DO A DHS HISTORY CHECK TO INSURE THAT THERE IS NO ACTIVE DHS CASE OR HISTORY AGAIN THAT WOULD PROHIBIT US FROM PLACING THE YOUNG PERSON WITH A PARTICULAR RELATIVE. AND THEN WE COMPLETE A HOME ASSESSMENT TO GATHER INFORMATION TO DETERMINE WHETHER OR NOT IT IS AN APPROPRIATE PLACEMENT FOR THE CHILD.

AFTER THAT DETERMINATION IS MADE, AGAIN THE REFERRAL IS OVER ELECTRONICALLY TO THE CENTRAL

REFERRAL UNIT. THE CENTRAL REFERRAL UNIT WOULD THEN GATHER THE ADDITIONAL INFORMATION AND SEND THAT PARTICULAR FILE TO A FOSTER CARE AGENCY.

Q. HOW MANY FOSTER CARE AGENCIES ARE THERE IN PHILADELPHIA CURRENTLY?

A. 30.

Q. AND WHO LICENSES THE FOSTER CARE AGENCIES?

A. THE STATE LICENSES FOSTER CARE AGENCIES, PADHS.

Q. AND WILL YOU PLEASE INFORM THE COURT AS TO WHAT EFFORTS ARE MADE IN TERMS OF THE GEOGRAPHIC LOCATION OF WHERE CHILDREN WILL BE PLACED IN FOSTER HOMES?

A. IT IS OUR ATTEMPT TO PLACE YOUNG PEOPLE IN THEIR COMMUNITY TO ENSURE THAT YOUNG PEOPLE MAY MAINTAIN A CONNECTION TO THEIR COMMUNITY, CERTAINLY MAINTAIN THE SCHOOL THAT THEY ARE ATTENDING, ANY ACTIVITIES THAT THEY ARE ATTENDING, IF IT IS SAFE FOR THAT YOUNG PERSON TO MAINTAIN -- BE MAINTAINED IN THEIR COMMUNITY. IF NOT, BECAUSE OUR FOSTER CARE AGENCIES ARE CITY-WIDE AND THEY STILL HAVE AN APPROPRIATE MATCH, ALTHOUGH IT MAY BE IN A DIFFERENT SECTION OF THE CITY, THEN IT IS THE RESPONSIBILITY FOR THE CUA CASE MANAGER TO ENSURE THAT THE CHILD CONTINUES TO REMAIN IN THE SAME SCHOOL, CONTINUE TO RECEIVE THE SAME SERVICES.

Q. SO WE HAVE BEEN TALKING ABOUT CUA'S AND ALSO FOSTER CARE AGENCIES.

A. YES.

Q. COULD YOU PLEASE DIFFERENTIATE FOR THE COURT THE DISTINCTION BETWEEN FOSTER CARE AGENCIES AND CUA AGENCIES?

A. YES. THE CUA'S ARE COMMUNITY UMBRELLA AGENCIES. AS I STATED, THE CITY IS DIVIDED INTO TEN GEOGRAPHICAL NEIGHBORHOOD, IF YOU WILL. AND THE COMMUNITY UMBRELLA AGENCIES -- WE ACTUALLY HAVE SIX PROVIDERS WHO ARE RESPONSIBLE FOR PROVIDING THE CASE MANAGEMENT SERVICES TO CHILDREN AND FAMILIES WHO ARE ACCEPTED FOR FORMAL CHILD WELFARE SERVICES. SO FOR EXAMPLE, IF A FAMILY IS RECEIVING IN-HOME SERVICES BECAUSE WE ARE ABLE TO MAINTAIN A CHILD IN THEIR HOME, THEN THE CUA CASE MANAGER IS RESPONSIBLE FOR ENSURING THE CHILD'S SAFETY THROUGH WEEKLY VISITATION, IS RESPONSIBLE FOR DEVELOPING A CASE PLAN FOR THE FAMILY SO THAT THE FAMILY KNOWS WHAT SERVICES NEED TO BE PROVIDED SO THAT WE CAN SAFELY CLOSE THEIR CASE. THE CUA CASE MANAGER IS RESPONSIBLE FOR ALL ASSESSMENTS AND ALL REFERRALS OR INTERVENTIONS THAT THE FAMILY NEEDS.

IF THE CUA CASE MANAGER -- IF A YOUNG PERSON IS IN PLACEMENT, THE CUA CASE MANAGER AGAIN IS RESPONSIBLE FOR ALL CASE MANAGEMENT ACTIVITIES WHICH INCLUDES THE SAME THING, ASSESSMENT AND SAFETY THROUGH VISITATION. THAT VISITATION IS ACTUALLY MONTHLY, CASE

PLANNING AND INTERVENTION THAT THE FAMILY NEEDS AS WELL.

Q. AND IF A CHILD HAS SPECIAL NEEDS AND HAS TO SEE A THERAPIST, FOR EXAMPLE, OR HAS MULTIPLE MEDICAL APPOINTMENTS TO ATTEND, WHOSE RESPONSIBILITY IS IT TO ENSURE THAT THE CHILD RECEIVES THOSE SERVICES AND ATTENDS THOSE APPOINTMENTS?

A. SO THE FOSTER CARE PARENT, BECAUSE WE WANT FOSTER PARENTS TO TREAT THE CHILD LIKE IT'S THEIR CHILD, IS RESPONSIBLE FOR TAKING THE CHILD TO SCHOOL, MEDICAL APPOINTMENTS, BEHAVIORAL HEALTH APPOINTMENTS. HOWEVER, IN THE EVENT -- BECAUSE AT TIMES FOSTER PARENTS MAY HAVE MULTIPLE CHILDREN IN THEIR HOMES, IN THE EVENT THAT THEY ARE UNABLE TO DO SO, IT IS THE CUA CASE MANAGER'S RESPONSIBILITY.

Q. AND NOW WILL YOU PLEASE EXPLAIN THE ROLE OF THE FOSTER CARE AGENCY?

A. YES. THE FOSTER CARE AGENCY IS RESPONSIBLE FOR IDENTIFYING POTENTIAL FOSTER PARENTS; THEY ARE RESPONSIBLE FOR RECRUITING THOSE FOSTER PARENTS; THEY ARE RESPONSIBLE FOR PROVIDING TRAINING OF FOSTER PARENTS AND KINSHIP CARE PARENTS, AND THEY ARE ALSO RESPONSIBLE FOR THE CERTIFICATION AND MAINTAINING THE CERTIFICATION OF THE FOSTER PARENTS.

Q. AND THE CERTIFICATION CRITERIA IS DETERMINED BY THE PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES?

A. YES.
Q. AND DHS CONTRACTS WITH WHOM?
A. DHS CONTRACTS WITH THE FOSTER CARE PROVIDER AGENCIES.
Q. AND THE FOSTER CARE AGENCIES CONTRACT WITH THE CUA'S?
A. NO, DHS ALSO CONTRACTS WITH THE CUA'S. SO DHS HAS CONTRACTS WITH THE COMMUNITY UMBRELLA AGENCIES AS WELL AS FOSTER CARE AGENCIES.
MS. BARCLAY: YOUR HONOR, I WOULD OBJECT TO THE LEADING QUESTIONS.
THE COURT: OVERRULED.
BY MS. OLIVER:
Q. AND FOR PURPOSES OF THIS LITIGATION WITH REGARD TO CATHOLIC SOCIAL SERVICES, CATHOLIC SOCIAL SERVICES IS A FOSTER CARE AGENCY?
A. YES, IT IS.
Q. AND CATHOLIC SOCIAL SERVICES ALSO HAS THE CUAS, IS THAT CORRECT?
A. YES.
Q. SO WHO MAKES THE DETERMINATION AS TO WHETHER OR NOT A CHILD IS PLACED IN A PARTICULAR HOME?
A. THE CENTRAL REFERRAL UNIT MAKES THE DETERMINATION OF THE APPROPRIATE LEVEL OF CARE. SO WHETHER OR NOT THE CHILD HAS TO BE PLACED IN FOSTER

CARE, GENERAL FOSTER CARE, TREATMENT FOSTER CARE. THE FOSTER CARE. WE THEN -- THE CENTRAL REFERRAL UNIT THEN SENDS OVER THAT REFERRAL INFORMATION TO THE FOSTER CARE AGENCY AND THE FOSTER CARE AGENCY SELECTS THE FOSTER PARENT AND BASED ON THE REFERRAL INFORMATION THAT CRU SYNTHESISES.

Q. DO FOSTER PARENTS HAVE THE ABILITY TO DECIDE WHICH FOSTER CARE AGENCY THEY WOULD LIKE TO WORK WITH?

A. YES.

Q. ARE THERE INSTANCES WHEREIN THE DEPARTMENT OF HUMAN SERVICES HAS EVER OPPOSED A CHILD'S PLACEMENT IN A PARTICULAR HOME?

A. YES.

Q. AND WILL YOU PLEASE INFORM THE COURT, FOR EXAMPLE, LIKE A CIRCUMSTANCE UNDER WHICH THAT MIGHT OCCUR?

A. YES. PRIOR TO THE CERTIFICATION OF A FOSTER PARENT, THE FOSTER CARE PROVIDER AGENCY SUBMITS INFORMATION TO THE DEPARTMENT OF HUMAN SERVICES BY WAY OF OUR PROVIDER UNIT SO THAT WE CAN ISSUE WHAT WE CALL A PROVIDER LOCATION CODE FOR THAT PARTICULAR FOSTER PARENT. THAT CODE TELLS YOU WHERE THE FOSTER PARENT IS LOCATED. BUT PART OF THAT CODE IS THAT WE DO BACKGROUND, A DHS BACKGROUND TO DETERMINE WHETHER OR NOT THE FOSTER PARENT IS KNOWN TO THE DEPARTMENT OF HUMAN

SERVICES, EITHER HAVE AN ACTIVE PLACEMENT OR ACTIVE CASE WITH THE DEPARTMENT OF HUMAN SERVICES OR WHETHER OR NOT THEY HAD A DHS HISTORY. SO THERE HAVE BEEN TIMES IN WHICH FOSTER PARENTS, POTENTIAL FOSTER PARENT MAY HAVE AN ACTIVE DHS CASE IN WHICH THEIR CHILD, FOR EXAMPLE, IS IN PLACEMENT ON THE DELINQUENT SIDE OF THE SYSTEM. IN THOSE SITUATIONS, WE WOULD NOT ISSUE A PROVIDER LOCATION CODE. OR WE MAY FIND SOMETHING IN THE FOSTER PARENT HISTORY, THEY MAY HAVE HAD AN EXTENSIVE HISTORY WITH THE DEPARTMENT OF HUMAN SERVICES THAT COULD BE A RECENT HISTORY. AGAIN, WE WOULD DENY THE ISSUANCE OF A PROVIDER LOCATION CODE IN THOSE SITUATIONS.

Q. THANK YOU.

YOU TALKED ABOUT THE FACT THAT CUA CASE MANAGERS HAVE CERTAIN RESPONSIBILITIES WITH REGARD TO CHILDREN. WHAT IS THE CUA CHAIN OF COMMAND?

A. SO THE CUA CASE MANAGER REPORTS TO A CUA SUPERVISOR WHO IN TURN REPORTS TO A CASE MANAGEMENT DIRECTOR WHO IN TURN REPORTS TO A DIRECTOR.

Q. AND IS THERE AN OPERATIONS DIRECTOR FOR A CUA?

A. IT DEPENDS. EACH CUA HAS A DIFFERENT STRUCTURE. SO SOME HAVE OPERATIONS DIRECTOR, PARTICULARLY THE ONES WHO MAY MANAGE TWO COMMUNITY UMBRELLA AGENCIES, BUT FOR THE MOST PART, MOST CUA'S REPORT FROM THEIR DIRECTOR TO AN EXECUTIVE DIRECTOR FOR THE AGENCY.

Q. MS. ALI, DO YOU HAVE INFORMATION REGARDING APPROXIMATELY HOW MANY CHILDREN WHO ARE IN PLACEMENT -- WELL, HOW MANY CHILDREN AT THIS TIME TO YOUR KNOWLEDGE APPROXIMATELY ARE IN PLACEMENT THROUGH THE DEPARTMENT OF HUMAN SERVICES?

A. 6,000 CHILDREN.

Q. OKAY. AND OF THOSE CHILDREN, CAN YOU INFORM THE COURT ROUGHLY APPROXIMATLY HOW MUCH OF THOSE CHILDREN ARE PLACED IN KINSHIP CARE?

A. SO ABOUT 45 PERCENT OF THE CHILDREN WHO ARE IN PLACEMENT ARE IN KINSHIP CARE.

Q. AND ALSO WITH REGARD TO THE GEOGRAPHIC LOCATION OF CHILDREN IN TERMS OF THEIR PLACEMENT, COULD YOU TELL THE COURT APPROXIMATELY WHAT PERCENTAGE OF CHILDREN LIVE WITHIN 5 MILES OF THEIR HOME OF ORIGIN?

A. APPROXIMATELY 52 PERCENT OF THE CHILDREN IN PLACEMENT LIVE WITHIN 5 MILES.

Q. APPROXIMATELY WHAT PERCENTAGE OF CHILDREN ARE PLACED WITHIN 10 MILES OF THEIR HOME OF ORIGIN?

A. APPROXIMATELY 76 PERCENT. AND THOSE ARE FOR CHILDREN AND YOUTH WHO ARE IN FOSTER CARE OR KINSHIP CARE SETTINGS.

Q. THANK YOU.

ARE THERE SITUATIONS WHEN FOSTER PARENTS WORK FOR ONE AGENCY AND THEY DECIDE TO CHANGE AGENCIES?

A. YES.
Q. WILL YOU PLEASE INFORM THE COURT AS TO THAT?
MS. BARCLAY: OBJECTION, YOUR HONOR, AS TO SPECULATION.
THE COURT: WELL, OVERRULED. YOU JUST SAID INFORM, YOU DIDN'T SAY REASONS WHY.
MS. OLIVER: THANK YOU, YOUR HONOR.
BY MS. OLIVER:
Q. WILL YOU PLEASE PROVIDE THE COURT WITH REASONS AS TO WHY SOME FOSTER PARENTS CHANGE AGENCIES?
MS. BARCLAY: OBJECTION, YOUR HONOR, FOR SPEAKING ABOUT INFORMING AND THAT IS HEARSAY OF THIRD PARTIES.
BY MS. OLIVER:
Q. TO YOUR KNOWLEDGE AS THE DEPUTY --
THE COURT: OVERRULED.
MS. OLIVER: THANK YOU.
THE WITNESS: CAN YOU REPEAT THE QUESTION?
BY MS. OLIVER:
Q. WHY DO SOME FOSTER PARENTS CHANGE AGENCIES?
A. TO MY KNOWLEDGE AND IN MY EXPERTISE, THE REASON WHY FOSTER PARENTS CHANGE AGENCIES IS SOMETIMES THERE MAY BE DISSATISFACTION WITH A PARTICULAR FOSTER CARE AGENCY. OTHER TIMES THEY MAY HAVE A YOUNG PERSON IN

THEIR HOME WHO IS IN NEED OF SPECIALIZED SERVICES, SUCH AS SPECIALIZED BEHAVIORAL HEALTH, BECAUSE THEY HAVE A BEHAVIORAL HEALTH NEED THAT EXCEEDS THE EXPERTISE OF PARTICULAR FOSTER CARE AGENCIES. IN EITHER SITUATION, WE TRY TO OBTAIN OR WE DO OBTAIN AT THE DEPARTMENT A REASON WHY THE FOSTER PARENT WANTS TO TRANSFER. IF IT IS DISSATISFACTION FOR OUR FOSTER CARE AGENCY, THEN WE TRY TO RESOLVE THOSE DIFFERENCES BETWEEN THE FOSTER PARENT AS WELL AS THE AGENCY. IF IT IS BECAUSE A YOUNG PERSON NEEDS A HIGHER LEVEL OF CARE, WE ASK THE FOSTER PARENT IF THEY ARE WILLING TO CONTINUE TO CARE FOR THE YOUNG PERSON. IF THEY ARE WILLING TO CARE FOR THE YOUNG PERSON, THEN AS OPPOSED TO ALLOWING THE YOUNG PERSON TO DISRUPT FROM THE FOSTER HOME IN WHICH WE WOULD HAVE TO REMOVE THE CHILD FROM THE FOSTER HOME, WE TRANSFER THAT ENTIRE FOSTER HOME TO A DIFFERENT PROVIDER AGENCY.

Q. SO IN OTHER WORDS, IS IT YOUR TESTIMONY THAT IF A FOSTER PARENT CHANGES AGENCIES, THAT DOES NOT NECESSITATE THE DISRUPTION IN THAT CHILD'S PLACEMENT?

A. ABSOLUTELY. THE FIRST THING WE ASK FOSTER PARENTS WHO HAVE CHILDREN IN THEIR HOME IS WHETHER OR NOT THEY WILL BE WILLING TO CONTINUE TO FOSTER THAT CHILD OR YOUTH BECAUSE WE WANT TO MINIMIZE AND AVOID DISRUPTIONS.

Q. AND IF WE CAN GO BACK FOR JUST A MOMENT BECAUSE

YOU TALKED A BIT ABOUT FOSTER HOME PLACEMENT, FOSTER CARE HOME PLACEMENTS. CAN YOU TALK A LITTLE BIT ABOUT THE OTHER TYPES OF PLACEMENTS SUCH AS CONGREGATE CARE, GROUP HOMES AND MEDICAL TREATMENT FACILITIES?

A. YES. SO CONGREGATE CARE IS THE BROADER TERM WHEN WE TALK ABOUT NONFAMILY-LIKE SETTINGS. SO THEY CONSIST OF GROUP HOMES IN WHICH GROUP HOMES ARE LOCATED WITHIN THE COMMUNITY. THEY ARE IN VARIOUS SECTIONS OF THE CITY AND OUTSIDE THE CITY. THE YOUNG PERSON TENDS TO -- TYPICALLY WILL ATTEND A SCHOOL THAT IS IN THEIR PARTICULAR COMMUNITY. WE ALSO HAVE CHILD WELFARE PLACEMENT THAT I CALL INSTITUTIONAL PLACEMENTS. THOSE PLACEMENTS ARE CAMPUS-LIKE PLACEMENTS IN WHICH THE YOUNG PERSON LIVES ON THE CAMPUS AND THE SCHOOL IS PRIMARILY AN ON-GROUNDS SCHOOL IN WHICH IT IS RUN BY THE PARTICULAR PLACEMENT AGENCY. AND THEN THERE ARE RESIDENTIAL TREATMENT FACILITIES. THESE ARE FACILITIES IN WHICH A YOUNG PERSON HAS A PSYCHIATRIC EVALUATION THAT INDICATES THAT THERE IS A MEDICAL NECESSITY BECAUSE THAT YOUNG PERSON NEEDS A LEVEL OF TREATMENT. THE RTFS ARE CONTRACTED BY COMMUNITY BEHAVIORAL HEALTH, WHICH IS A MANAGED CARE ORGANIZATION, AND DHS ALSO HOLDS A SMALL CONTRACT WITH THE RESIDENTIAL TREATMENT FACILITIES IF THE YOUNG PERSON IS COMMITTED TO THE DEPARTMENT TO PROVIDE A PERSONAL ONE-ON-ONE FOR THE CHILD OR YOUTH.

Q. SO AN ASSESSMENT IS DONE WHICH DETERMINES THE TYPE OF PLACEMENT THAT WOULD BE BEST SUITED TO A PARTICULAR CHILD?

A. YES.

Q. AND WILL YOU TALK ABOUT RESPITE CARE, PLEASE?

A. YES. RESPITE CARE -- SO RFPA'S ARE LICENSED FOSTER PARENTS WHO ARE WILLING TO PROVIDE TEMPORARY CARE FOR A CHILD OR A YOUTH. RESPITE PROVIDERS TYPICALLY WANT TO DO SHORT-TERM AS OPPOSED TO LONG-TERM PLACEMENTS FOR CHILDREN AND YOUTH.

Q. AND WHY MIGHT RESPITE CARE BE USED?

A. RESPITE CARE IS USED FOR A NUMBER OF REASONS. WHEN YOUNG PEOPLE HAVE HIGHER LEVEL OF NEED SUCH AS BEHAVIORAL HEALTH NEEDS OR MEDICAL NEEDS, A FOSTER PARENT MAY NEED A BREAK, IF YOU WILL. SO THAT CHILD OR YOUTH WILL BE PLACED IN RESPITE CARE, OR YOU COULD USE RESPITE CARE IF A FOSTER PARENT IS GOING OUT OF TOWN, FOR EXAMPLE, FOR THE WEEKEND. AND THEN THE CHILD AGAIN IS PLACED TEMPORARY IN RESPITE.

Q. ONCE A CHILD IS PLACED IN CARE, DOES DHS HAVE THE AUTHORITY TO MOVE THAT CHILD TO A DIFFERENT HOME?

A. DHS HAS TO SEEK APPROVAL FROM THE COURT IN ORDER TO MOVE A CHILD FROM A PLACEMENT. AND IF IT'S AN EMERGENCY SITUATION, THEN DHS CAN MOVE THE CHILD IMMEDIATELY. BUT AGAIN, WE HAVE TO SEEK COURT APPROVAL

ON THE BACK END. IF IT IS A NONEMERGENCY SITUATION, THEN WE HAVE TO GET COURT APPROVAL BEFORE THE MOVE IS TO TAKE PLACE.

Q. THANK YOU.

MS. OLIVER: THE COURT'S INDULGENCE, PLEASE.

(BRIEF PAUSE IN THE PROCEEDING.)

MS. OLIVER: THANK YOU, YOUR HONOR.

BY MS. OLIVER:

Q. MS. ALI, GENERALLY DO CUA'S MAKE THE FIRST -- DO FOSTER CARE AGENCIES AND CUA'S MAKE REFERRALS TO OTHER AGENCIES?

A. NO, ALL REFERRALS COME THROUGH THE CENTRAL REFERRAL UNIT AT DHS. WE CENTRALIZED THAT PROCESS BACK IN JULY OF 2017. THE ONLY TIME A FOSTER CARE AGENCY CAN MAKE REFERRALS IS IF THEY ARE REFERRING INTERNALLY TO THEIR PROGRAM. SO FOR EXAMPLE, NET -- IF A YOUNG PERSON IS IN FOSTER HOME THROUGH NORTHEAST TREATMENT, THE FOSTER -- THE CHILD IS DISRUPTIVE OR NEEDS TO MOVE FROM THEIR FOSTER CARE AGENCY, THEN NORTHEAST TREATMENT OR NET WILL LOOK WITHIN THEIR OWN CONTINUUM FOR THE REFERRALS TO OCCUR.

Q. NOW, YOU HEARD TESTIMONY TODAY THAT THE DEPARTMENT OF HUMAN SERVICES HAS CLOSED INTAKE WITH CATHOLIC SOCIAL SERVICES, CORRECT?

A. YES.

Q. AND TO YOUR KNOWLEDGE, WHO MADE THAT DECISION?

A. COMMISSIONER CYNTHIA FIGUEROA.

Q. HAVE THERE BEEN OTHER OCCASIONS IN THE PAST WHEN THE DEPARTMENT OF HUMAN SERVICES HAS CLOSED INTAKE AT OTHER AGENCIES?

A. YES.

Q. AND WHEN THAT HAS HAPPENED, COULD YOU PLEASE DESCRIBE THAT PROCESS TO THE COURT AND WHAT HAS HAPPENED TO CHILDREN WHEN INTAKE HAS BEEN CLOSED AT AGENCIES?

A. SO WHEN INTAKE IS CLOSED AT AGENCIES, THE CENTRAL REFERRAL UNIT WILL NO LONGER SEND NEW REFERRALS TO A PARTICULAR AGENCY. HOWEVER, WHEN A CHILD OR A YOUTH IS KNOWN TO A PARTICULAR AGENCY, OR IF THEY HAVE SIBLINGS WITH A PARTICULAR AGENCY, THEN HIGHER LEVEL LEADERSHIP AT DHS WILL GRANT EXCEPTIONS.

Q. AND TO YOUR KNOWLEDGE, IN LIGHT OF THE CURRENT STOPPAGE OF REFERRALS TO CATHOLIC SOCIAL SERVICES, HAVE THERE BEEN ANY EXCEPTIONS TO THAT?

A. YES.

Q. AND WHO MAKES THE DETERMINATION AS TO WHETHER EXCEPTIONS SHOULD BE GRANTED?

A. I DO.

Q. AND WHO MAKES THE REQUESTS FOR THOSE EXCEPTIONS?

A. HIGHER LEVEL LEADERSHIP AT THE PARTICULAR

AGENCY. IF YOU TALK ABOUT -- IN THIS PARTICULAR CASE IT WOULD HAVE BEEN JIM AMATO FROM CATHOLIC SOCIAL SERVICES OR JIM BLACK FROM CATHOLIC SOCIAL SERVICES.

Q. AND WHEN INTAKE IS CLOSED AT A PARTICULAR AGENCY, WHAT HAPPENS TO THE CHILDREN WHO ARE ALREADY PLACED WITH THOSE AGENCIES?

A. THEY REMAIN WITH THE AGENCY.

MS. OLIVER: THANK YOU. I HAVE NO FURTHER QUESTIONS.

THE COURT: CROSS-EXAMINE.

MS. BARCLAY: MAY I CROSS THIS WITNESS, YOUR HONOR?

THE COURT: YES.

MS. BARCLAY: MAY I HAVE PERMISSION TO MOVE THIS CHAIR JUST TO PUT MY BINDER ON IT?

THE COURT: OKAY.

CROSS-EXAMINATION

BY MS. BARCLAY:

Q. GOOD AFTERNOON, MS. ALI.

A. GOOD AFTERNOON.

Q. YOU ENCOURAGE PROSPECTIVE FOSTER FAMILIES TO FIND A FOSTER AGENCY IN PHILADELPHIA THAT WOULD BE THE BEST FIT FOR THAT PARTICULAR FAMILY?

A. YES.

Q. YOU WANT FAMILIES TO FEEL CONFIDENT AND

COMFORTABLE ABOUT THE AGENCIES THEY CHOOSE?

A. YES.

Q. YOU TESTIFIED THAT PARENTS HAVE THE ABILITY TO DECIDE WHICH AGENCY TO WORK WITH?

A. YES.

Q. THESE AGENCIES WILL BE A BIG SUPPORT TO THE FOSTER PARENT DURING THEIR PARENTAL JOURNEY, WON'T THEY?

A. YES.

Q. THE DHS WORKS WITH A RANGE OF FOSTER CARE AGENCIES WITH DIFFERENT SPECIALTIES, RIGHT?

A. YES.

Q. THE MAYOR'S OFFICE HAS AN OFFICE OF LGBTQ AFFAIRS, CORRECT?

A. YES.

Q. THAT OFFICE DOES NOT PROVIDE SERVICES TO PEOPLE WHO DO NOT IDENTIFY AS LGBTQ, CORRECT?

MS. OLIVER: OBJECTION.

THE COURT: I DON'T KNOW THAT SHE WOULD KNOW THAT.

THE WITNESS: I WAS GOING TO SAY I DON'T KNOW.

BY MS. BARCLAY:

Q. FAIR ENOUGH.

THAT OFFICE HAS PARTNERED WITH OTHER FOSTER AGENCIES LIKE SECOND CHANCE AND PHILADELPHIA

FAMILY PRIDE FOR LGBTQ RECRUITING EVENTS, CORRECT?

MS. OLIVER: OBJECTION.

THE COURT: IF YOU KNOW.

THE WITNESS: I'M NOT SURE.

MS. BARCLAY: WITH INDULGENCE, YOUR HONOR.

THE COURT: YES.

(BRIEF PAUSE IN THE PROCEEDING.)

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR?

THE COURT: YES.

BY MS. BARCLAY:

Q. MS. ALI, I HAVE HANDED YOU A DOCUMENT ENTITLED FOSTER PARENT RECRUITMENT. THIS IS ON THE PHILADELPHIA FAMILY PRIDE WEBSITE. DOES THAT LOOK CORRECT TO YOU?

A. YES.

Q. THE DOCUMENT SAYS THAT PHILADELPHIA FAMILY PRIDE HAS PARTNERED WITH THE MAYOR'S OFFICE WITH LGBTQ AFFAIRS?

MS. OLIVER: OBJECTION.

MS. BARCLAY: I AM NOT SURE WHAT THE OBJECTION IS, YOUR HONOR.

MS. OLIVER: YOUR HONOR, THIS DOCUMENT IS NOT A DOCUMENT, THAT PAGE, THAT WAS ISSUED BY THE DEPARTMENT OF HUMAN SERVICES, IT'S A DOCUMENT FROM

PHILADELPHIA FAMILY PRIDE.

MS. BARCLAY: YOUR HONOR, I AM JUST ASKING HER A QUESTION ABOUT IT, NUMBER ONE, AND NUMBER TWO, THE RULES OF EVIDENCE DON'T APPLY AT A PRELIMINARY INJUNCTION HEARING.

THE COURT: WELL, IT SPEAKS FOR ITSELF. OVERRULED.

BY MS. BARCLAY:

Q. MS. ALI, IT SAYS THAT PHILLY FAMILY PRIDE HAS PARTNERED WITH THE MAYOR'S OFFICE OF LGBTQ AFFAIRS, A SECOND CHANCE AND DHS RECRUIT LGBTQ ADULTS, SINGLE OR PARTNERED, IN THE PHILADELPHIA AREA TO BECOME FOSTER PARENTS, SPECIFICALLY FOR LGBTQ YOUTHS IN THE SYSTEM. DID I READ THAT CORRECTLY?

A. YES.

Q. DOES THIS REFRESH YOUR RECOLLECTION ABOUT ANY RECRUITING THAT IS GOING ON BY AGENCIES FOR LGBTQ POPULATION?

A. IT ACTUALLY REFRESHES MY RECOLLECTION ABOUT THE FOSTER CARE RECRUITMENT THAT THE DEPARTMENT OF HUMAN SERVICES DID IN MARCH IN WHICH WE HAD A RECRUITMENT STRATEGY AND WE DID A PHONE BANK IN WHICH WE WANTED LGBTQ INDIVIDUALS WHO ARE INTERESTED IN PROVIDING THAT LEVEL OF CARE TO YOUNG PEOPLE. SO WE ACTUALLY TARGETED -- THE PHILADELPHIA DEPARTMENT OF HUMAN SERVICES

ACTUALLY TARGETED EVERYONE IN ALL FOSTER CARE AGENCIES AND NOT JUST ONE FOSTER CARE AGENCY IN PARTICULAR.

Q. SO DHS WAS ENCOURAGING RECRUITMENT OF POPULATION FOR PARENTS TO CARE FOR LGBTQ YOUTHS, RIGHT?

A. YES.

Q. AND THAT'S A PRIORITY FOR DHS?

A. ONE OF MANY, YES.

Q. ONE OF THE POINTS OF THESE TARGETED RECRUITING SESSIONS WAS ALSO TO FIND LGBTQ FOSTER PARENTS TO CARE FOR LGBTQ YOUTHS, CORRECT?

A. LGBTQ AFFIRMING FOSTER PARENTS. SO THE FOSTER PARENTS IN AND OF THEMSELVES DID NOT HAVE TO BE LGBTQ.

Q. SURE. BUT THERE WAS ALSO AN EFFORT TO RECRUIT LGBTQ PARENTS NOW THAT THEY WERE A PRIORITY AS WELL, CORRECT?

A. YES.

Q. AND AS YOU SAID, TO FIND PARENTS WHO WOULD BE SUPPORTIVE AND AFFIRMING OF A LGBTQ FOSTER CHILD?

A. YES.

Q. IF A FAMILY WENT TO ANOTHER AGENCY LOOKING FOR A PARTICULAR EXPERTISE WITH SUPPORTING LGBTQ POPULATION, IT WOULD BE APPROPRIATE FOR THAT AGENCY TO SEND THAT COUPLE TO SECOND CHANCE, FOR EXAMPLE, IF THEY WANTED PARTICULAR EXPERTISE?

A. I WOULD NOT BE ABLE TO ANSWER THAT QUESTION.

Q. YOU WERE TRYING TO ENSURE THROUGH THESE PROGRAMS THAT LGBTQ POPULATIONS WOULD BE ABLE TO FIND A FOSTER AGENCY THAT IS A GOOD FIT FOR THEM AND THEY CAN BE CONFIDENT IN, RIGHT?

A. YES.

Q. IF LGBTQ POPULATIONS WERE NOT ABLE TO WORK WITH AN AGENCY THAT WAS A GOOD FIT OR THAT WAS AFFIRMING OF THEM, THOSE LGBTQ FAMILIES WOULD BE HARMED, RIGHT?

A. CAN YOU REPEAT YOUR QUESTION?

Q. IF LGBTQ FAMILIES WERE NOT ABLE TO WORK WITH AN AGENCY THAT WAS AFFIRMING OF THEM, THOSE LGBTQ FAMILIES WOULD BE HARMED, RIGHT?

A. YES.

Q. SO IT WAS IMPORTANT FOR THEM TO BE ABLE TO FIND AN AGENCY THAT IS A GOOD FIT?

A. YES.

Q. AND PREVENTING FAMILIES FROM WORKING WITH AN AGENCY THAT THEY THINK IS THE BEST FIT WOULD CAUSE THEM HARM, RIGHT?

A. ALL OF OUR AGENCIES -- THE REASON WHY WE DID A LGBTQ RECRUITMENT STRATEGY IS BECAUSE WE HAVE A NUMBER OF YOUNG PEOPLE WHO ARE LGBTQ.

Q. I UNDERSTAND, THAT'S NOT THE QUESTION I AM ASKING, MS. ALI.

A. WHAT IS THE QUESTION?

Q. IF A FAMILY WAS PREVENTED FROM AN AGENCY THAT THEY BELIEVE WOULD BE THE BEST FIT FOR THEM, WOULD THAT CAUSE A HARM FOR THE FAMILY?

MS. OLIVER: OBJECTION, YOUR HONOR.

THE COURT: SUSTAINED.

MS. OLIVER: JUST CUT IT DOWN, THE QUESTION AS TO WHAT WOULD BE HARMFUL TO THE FAMILY.

BY MS. BARCLAY:

Q. YOU HEARD FROM MRS. PAUL AND AND MS. FULTON AND MS. SIMMS-BUSCH OFFER TESTIMONY TODAY?

A. I DID.

Q. ALL OF THOSE INDIVIDUALS TALKED ABOUT HOW CATHOLIC SOCIAL SERVICES IS A GOOD FIT FOR THEM, RIGHT?

A. YES.

Q. DO YOU THINK IT'S IMPORTANT FOR FAMILIES TO BE ABLE TO FEEL CONFIDENT AND CONFIDENT WITH THE OPTION THEY CHOOSE?

A. YES.

Q. AND YOU FEEL IT'S ALSO IMPORTANT FOR THOSE FAMILY TO FEEL SUPPORTED AND CONFIDENT IN THEIR DECISION?

A. YES. AND, IN TURN, I THINK FOSTER CARE PROVIDER AGENCIES SHOULD MAKE THEM FEEL THAT WAY.

Q. YOU KNOW MS. PAUL FROM YOUR WORK AT DHS, RIGHT?

A. I DO NOT KNOW MS. PAUL PERSONALLY OR FROM MY

PROFESSIONAL WORK AT DHS.

Q. WE HAVE DISCUSSED HOW FAMILIES NEED TO BE ABLE TO FIND AN AGENCY THAT IS A GOOD FIT FOR THEM, BUT AGENCIES ALSO NEED TO EVALUATE PROSPECTIVE FAMILIES FOR FOSTER CARE, CORRECT?

A. YES.

Q. THERE ARE LIMITS ON WHO CAN BECOME A FOSTER PARENT?

A. YES. BASED ON THE 3700 REGULATIONS.

Q. YOU ALSO SAID THAT YOU MIGHT DENY A FAMILY BASED ON THEIR HISTORY WITH DHS THAT COMES TO YOU BEFORE CERTIFICATION, CORRECT?

A. WE DENY THE ISSUANCE OF A PROVIDER LOCATION CODE, NOT DENYING FOSTER PARENTS.

Q. THE PROVIDER LOCATION CODE FOR THE AGENCY?

A. THE PROVIDER LOCATION CODE FOR THE AGENCY, AND IT SPEAKS FOR THE AGENCY AS WELL AS THE PARTICULAR FOSTER HOME.

Q. SO IF YOU DENIED THE LOCATION CODE, WOULD THAT FAMILY BE ABLE TO BE A FOSTER PARENT THROUGH THAT AGENCY?

A. YES. THROUGH ANOTHER COUNTY.

Q. IN ANOTHER COUNTY?

A. YES.

Q. BUT NOT IN PHILADELPHIA?

A. YES.
Q. SO YOU'RE -- YOU HAVE DENIED THE ABILITY OF FAMILIES TO BE A FOSTER PARENT IN PHILADELPHIA BASED ON THEIR HISTORY WITH DHS?
A. I HAVE DENIED THE ISSUANCE OF A PROVIDER LOCATION CODE.
Q. WHICH HAS THE IMPACT OF PREVENTING THEM FROM BEING A FOSTER PARENT IN PHILADELPHIA, AS YOU JUST SAID?
A. YES.
Q. YOU ARE AWARE THAT STATE LAW ACTUALLY REQUIRES AGENCIES TO CONSIDER THE ABILITY OF THE APPLICANTS TO WORK IN PARTNERSHIP WITH THE FOSTER AGENCY, CORRECT?
A. YES.
Q. AND YOU SAID THAT THE STATE ACTUALLY LICENSES FOSTER AGENCIES.
A. YES.
Q. AND THAT REQUIREMENT I JUST QUOTED YOU, THAT'S STATE LAW, CORRECT?
A. YES.
Q. AND DHS'S CONTRACT REQUIRES CATHOLIC TO COMPLY WITH STATE LAW.
A. YES.
Q. THE DHS CONTRACT ALSO HAS A LIST OF CRIMINAL CONVICTIONS THAT WOULD PREVENT AN INDIVIDUAL FROM BECOMING A FOSTER PARENT.

A. YES.

Q. WHEN A FOSTER AGENCY IS CONSIDERING CERTIFYING A FAMILY FOR FOSTER -- TO FOSTER CHILDREN, STATE LAW REQUIRES THAT THE AGENCY CONSIDER ADDITIONAL FACTORS, AND I WANT TO LOOK AT YOU WITH WHAT SOME OF THOSE FACTORS ARE.

THE AGENCY IS REQUIRED TO CONSIDER THE ABILITY TO PROVIDE CARE, NURTURING, AND SUPERVISION TO CHILDREN.

A. YES.

Q. THE AGENCY HAS CONSIDERED THERE IS A DEMONSTRATED STABLE, MENTAL, AND EMOTIONAL ADJUSTMENT.

A. OF THE PARENT.

Q. OF THE PROJECTED FOSTER FAMILY.

A. YES. YES.

Q. AND THAT MIGHT EVEN REQUIRE A PSYCHOLOGICAL EVALUATION, CORRECT?

A. YES.

Q. WHETHER THE FAMILY HAS SUPPORTIVE COMMUNITY TIES IS ANOTHER FACTOR TO CONSIDER.

A. YES.

Q. THE AGENCY HAS TO CONSIDER FAMILIAL RELATIONSHIPS, ATTITUDES, AND EXPECTATIONS, ESPECIALLY THAT MIGHT AFFECT THE FOSTER CHILD.

A. YES.

Q. THEY HAVE TO CONSIDER THE FAMILY'S ABILITY TO ACCEPT THE CHILD'S RELATIONSHIP WITH HIS OWN PARENTS.
A. YES.
Q. THEY HAVE TO CONSIDER THE NUMBER AND CHARACTERISTICS OF CHILDREN BEST SUITED TO THE FOSTER FAMILY.
A. YES.
Q. AND THIS LAW REQUIRES AGENCIES TO CONSIDER THE ABILITY OF THE APPLICANT TO WORK IN PARTNERSHIP WITH THE FOSTER AGENCY.
A. YES.
Q. THIS INVOLVED A CONSIDERATION OF WHICH FAMILIES WOULD BE A GOOD FIT WITH THE AGENCIES.
A. I AM NOT SURE EXACTLY WHAT YOU ARE SAYING TO -- IN TERMS OF GOOD FIT.
Q. THERE'S NOTHING IN STATE LAW THAT SAYS THAT AGENCIES MUST CERTIFY THE APPLICANT AFTER CONSIDERING THESE FACTORS, IS THERE?
A. I AM NOT SURE.
Q. YOU ARE NOT AWARE OF ANYTHING IN STATE LAW THAT SETS FORTH THAT REQUIREMENT, ARE YOU?
MS. OLIVER: OBJECTION.
THE COURT: SHE SAID SHE IS NOT SURE.
THE WITNESS: I AM NOT SURE.
MS. BARCLAY: JUST A MOMENT, YOUR HONOR.

BY MS. BARCLAY:

Q. DHS'S CONTRACT WITH CATHOLIC IS NOT JUST LIMITED TO FOSTER CARE SERVICES, CORRECT?

A. CORRECT.

Q. IT ALSO INVOLVES SERVICES FOR ADJUDICATED DELINQUENTS, ADJUDICATED DEPENDENT TEENS, AND REINTEGRATION SERVICES THAT COME FROM THE CENTRAL REFERRAL UNIT, CORRECT?

A. ONLY THE DEPENDENT SERVICES COME FROM THE CENTRAL REFERRAL UNIT.

Q. AND THE CONTRACT WITH CATHOLIC SOCIAL SERVICES INVOLVES SERVICES FOR THOSE DEPENDENT TEEN BOYS AND GIRLS, CORRECT?

A. YES.

Q. AND THE CONTRACT ALSO INVOLVES SERVICES FOR ADJUDICATED DELINQUENTS.

A. YES.

Q. AND THE CONTRACT INVOLVES REINTEGRATION SERVICES.

A. YES.

Q. THIS CONTRACT HAS A PROVISION ABOUT THE CITY'S PUBLIC ACCOMMODATION ORDINANCE.

A. YES.

Q. PUBLIC ACCOMMODATIONS IN PHILADELPHIA SHOULD ACCEPT ALL COMERS, RIGHT?

A. I DON'T KNOW THE SPECIFICS.

Q. CATHOLIC'S HAS BEEN PARTNERING WITH THE GOVERNMENT TO PROVIDE FOSTER CARE SERVICES FOR YEARS, RIGHT?

A. YES.

Q. THE DHS CONTRACT SPECIFICALLY OBSERVES THAT CATHOLIC IS AN ORGANIZATION WITH A RELIGIOUS MISSION.

MS. OLIVER: OBJECTION, YOUR HONOR. THE QUESTIONS SPECIFICALLY WITH REGARD TO THE DHS CONTRACT, THE CONTRACT WAS ENTERED AS AN EXHIBIT IN THESE PROCEEDINGS. AND I BELIEVE THE COURT CAN CERTAINLY REVIEW THE CONTRACT IF THE COURT DEEMS IT NECESSARY AND APPROPRIATE.

MS. BARCLAY: MAY I HAVE PERMISSION TO APPROACH THE WITNESS WITH THE CONTRACT, YOUR HONOR?

THE COURT: YES.

MS. OLIVER: YOUR HONOR, AT THIS TIME, BEFORE THIS DOCUMENT IS SHOWN TO THE WITNESS, IF WE CAN PLEASE TAKE A LOOK AT THE DOCUMENT.

THE COURT: YES.

BY MS. BARCLAY:

Q. MS. ALI, IF YOU CAN TURN YOUR ATTENTION TO THE BOTTOM OF PAGE 27. THIS IS ECF 13-3.

MS. OLIVER: OBJECTION, YOUR HONOR. I AM OBJECTING AT THIS TIME TO THIS WITNESS BEING QUESTIONED

REGARDING THE CONTRACT, AS THE CONTRACT SPEAKS FOR ITSELF AND THIS WITNESS IS NOT AN ATTORNEY.

MS. BARCLAY: IF THE CONTRACT SPEAKS FOR ITSELF, YOUR HONOR, THERE SHOULD NOT BE A PROBLEM BRIEFLY DISCUSSING THAT.

MS. OLIVER: YOUR HONOR, SHE IS ALSO NOT THE PERSON WHO NEGOTIATED THE CONTRACT AND WOULD NOT HAVE KNOWLEDGE SPECIFICALLY AS TO THE TERMS OF THE CONTRACT. I SUBMIT TO THE COURT THAT ON CROSS-EXAMINATION THAT HER TESTIMONY -- HER QUESTIONS SHOULD BE LIMITED TO QUESTIONS ABOUT DHS'S POLICY, PRACTICES OR PROCEDURES, AND SPECIFICALLY NOT QUESTIONS WITH REGARD TO THE CONTRACT ABOUT WHICH SHE DOES NOT HAVE KNOWLEDGE.

MS. BARCLAY: THE RELIGIOUS NATURE OF THE AGENCY, YOUR HONOR, IS RELEVANT TO QUESTIONS ABOUT FIT WITH FAMILIES AND THE POPULATION THAT THE AGENCY REACHES. AND SO WE ARE BRINGING THE WITNESS'S ATTENTION TO THAT FOR THE CROSS-EXAMINATION PURPOSES.

THE COURT: FOR THAT LIMITED PURPOSE, I WILL PERMIT IT.

BY MS. BARCLAY:

Q. MS. ALI, IF I COULD TURN YOUR ATTENTION TO THE BOTTOM OF PAGE 27 OF DOCUMENT ECF 13-3. THIS SAYS THAT --

MS. OLIVER: MAY I HAVE A MOMENT, PLEASE?

THE COURT: YES.

(BRIEF PAUSE IN THE PROCEEDING.)

MS. OLIVER: COULD YOU PLEASE AGAIN STATE WHAT YOU ARE REFERRING HER TO?

BY MS. BARCLAY:

Q. MS. ALI, IF I COULD TURN YOUR ATTENTION TO THE BOTTOM OF PAGE 27 OF DOCUMENT ECF 13-3. THIS SAYS: PROVIDER ORGANIZATIONAL OVERVIEW. THE MISSION STATEMENT. CATHOLIC SOCIAL SERVICES OF THE ARCHDIOCESE OF PHILADELPHIA CONTINUES TO WORK -- THE WORK OF JESUS BY AFFIRMING, ASSISTING, AND ADVOCATING FOR INDIVIDUALS, FAMILIES, AND COMMUNITIES. THE VISION AND VALUE STATEMENT OF CATHOLIC SOCIAL SERVICES.

THEN IT GOES ON TO TALK ABOUT THE WAYS THAT -- IF YOU TURN TO THE NEXT PAGE -- CATHOLIC SOCIAL SERVICES EXISTS TO TRANSFORM LIVES AND TO BRING ABOUT A JUST AND COMPASSIONATE SOCIETY WHERE EVERY INDIVIDUAL IS VALUED, FAMILIES ARE HEALTHY AND STRONG, AND COMMUNITIES ARE UNITED IN THEIR COMMITMENT TO THE GOOD OF ALL. WE ENVISION A WORLD TOUCHED BY GOD'S MERCY WHERE POVERTY AND NEED ARE ALLEVIATED AND THE PEOPLE SHARE JUSTLY THE BLESSINGS OF CREATION.

AND THEN IF I COULD TURN YOUR ATTENTION, MS. ALI -- DID I READ THAT CORRECTLY?

A. YES.

Q. IF I COULD TURN YOUR ATTENTION TO DOCUMENT ECF 13-3, PAGE 38. THIS IS AN ORGANIZATIONAL CHART, AND IT SAYS: CATHOLIC SOCIAL SERVICES. ARCHDIOCESE OF PHILADELPHIA. ORGANIZATIONAL STRUCTURE.

IS IT POSSIBLE THAT --

MS. OLIVER: NO. EXCUSE ME. WE DON'T SEEM TO HAVE THAT. OURS GOES TO 37.

MS. BARCLAY: IT'S RIGHT HERE.

BY MS. BARCLAY:

Q. IS IT POSSIBLE THAT THE RELIGIOUS NATURE OF CATHOLIC SOCIAL SERVICES ALLOWS IT TO REACH DIFFERENT POPULATIONS AND DIFFERENT FAMILIES IN UNIQUE WAYS?

A. ASK THE QUESTION -- CAN YOU REPEAT THAT QUESTION?

MS. OLIVER: IS THAT A QUESTION?

BY MS. BARCLAY:

Q. IS IT POSSIBLE THAT THE RELIGIOUS NATURE AND MISSION OF CATHOLIC SOCIAL SERVICES ALLOWS IT TO REACH DIFFERENT UNIQUE FAMILIES IN UNIQUE WAYS COMPARED TO OTHER AGENCIES?

MS. OLIVER: OBJECTION; CALLS FOR SPECULATION.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. IN ALL THE TIME YOU HAVE BEEN AT DHS, FOR THE 18 YEARS, I BELIEVE YOU SAID -- CORRECT, MS. ALI?

A. YES.

Q. -- YOU ARE NOT AWARE OF ANYONE FILING A COMPLAINT AGAINST CATHOLIC SOCIAL SERVICES FOR PERFORMING FOSTER CARE CONSISTENT WITH THIS RELIGIOUS MISSION, ARE YOU?

THE COURT: ASK THAT QUESTION AGAIN.

BY MS. BARCLAY:

Q. IN THE 18 YEARS THAT YOU HAVE BEEN AT DHS, YOU ARE NOT AWARE OF ANYONE FILING A COMPLAINT AGAINST CATHOLIC FOR PERFORMING FOSTER CARE CONSISTENT WITH THIS RELIGIOUS MISSION, ARE YOU?

A. I'M NOT -- I DON'T KNOW. NO.

Q. YOU ARE NOT AWARE --

A. I AM NOT AWARE.

Q. YOU ARE NOT AWARE OF ANYONE FILING A COMPLAINT AGAINST CATHOLIC SOCIAL SERVICES IN THE PROVISION OF FOSTER CARE, TO YOUR KNOWLEDGE?

A. I AM UNSURE.

Q. CAN YOU THINK THAT AT THIS TIME ANY EXAMPLE OF A COMPLAINT FILED AGAINST CATHOLIC SOCIAL SERVICES IN THE PROVISION OF FOSTER CARE SERVICES?

A. I AM REALLY NOT SURE.

Q. WOULD YOU HAVE REMEMBERED IF A COMPLAINT WAS FILED AGAINST THE AGENCY?

MS. OLIVER: OBJECTION, YOUR HONOR; ASKED AND ANSWERED.

THE COURT: SHE IS NOT SURE.

THE WITNESS: I'M NOT SURE. I DON'T KNOW HOW --

MS. BARCLAY: I AM NOT SURE IF SHE'S NOT SURE SHE WOULD NEVER HAVE KNOWN ABOUT THE COMPLAINTS BECAUSE IT WOULD NOT HAVE COME TO HER ATTENTION, OR SHE JUST AT THIS TIME CAN'T THINK OF ANY.

THE COURT: SHE SAID SHE IS NOT SURE. SO SHE -- THAT'S HER ANSWER. SHE IS NOT SURE.

MS. BARCLAY: YOUR HONOR, MAY I HAVE PERMISSION TO JUST CONFIRM WHAT THAT ANSWER MEANS?

THE COURT: I WOULD THINK THAT'S BASIC ENGLISH. SHE IS NOT SURE.

MS. BARCLAY: OKAY.

BY MS. BARCLAY:

Q. YOU ARE NOT AWARE OF ANY FAMILIES THAT WERE PREVENTED FROM BECOMING FOSTER PARENTS BECAUSE OF CATHOLIC SOCIAL SERVICES?

MS. OLIVER: OBJECTION.

THE COURT: OVERRULED.

THE WITNESS: I WOULD NOT KNOW THAT.

BY MS. BARCLAY:

Q. SO YOU ARE NOT AWARE OF ANY PERSONALLY?

A. I DON'T -- I DON'T KNOW.

Q. YOU ARE FAMILIAR WITH DHS'S OPERATIONS, POLICIES, AND PROCEDURES, INCLUDING THE PRACTICES THAT ARE THE SUBJECT OF THIS ACTION?

A. YES.

Q. THE DHS FOSTER CARE CONTRACT SAYS THAT, QUOTE, THE PROVIDER SHALL NOT REJECT A CHILD OR FAMILY FOR SERVICES BASED UPON THE LOCATION OR CONDITION OF THE FAMILY'S RESIDENCE, THEIR ENVIRONMENTAL OR SOCIAL CONDITION, OR FOR ANY OTHER REASON IF THE PROFILES OF SUCH CHILD OR FAMILY ARE CONSISTENT WITH THE PROVIDER'S SCOPE OF SERVICES OR DHS'S APPLICABLE STANDARDS AS LISTED IN THE PROVIDER AGREEMENT, UNLESS THE EXCEPTION IS GRANTED BY THE COMMISSIONER OR THE COMMISSIONER'S DESIGNEE IN HIS SOLE DISCRETION.

MY QUESTION IS: THIS PARAGRAPH IS DEALING WITH A REJECTION OF REFERRALS, CORRECT?

A. YES.

Q. AND THIS IS REFERRING TO A REJECTION OF A REFERRAL FROM DHS, CORRECT?

A. YES.

Q. NON-RELATIVE FAMILY MEMBERS GENERALLY APPROACH FOSTER AGENCIES ABOUT BECOMING FOSTER PARENTS.

A. IT DEPENDS.

Q. ONE OF THE WAYS THAT NON-RELATIVE FAMILY MEMBERS CAN BECOME A FOSTER AGENCY -- OR CAN BECOME FOSTER PARENTS IS BY APPROACHING A FOSTER AGENCY, CORRECT?

A. YES. THAT'S ONE OF THE WAYS.

Q. AND IF THEY COME THROUGH THAT WAY, AGENCIES WILL DECIDE TO EVALUATE THOSE FAMILIES AS PART OF THEIR NORMAL INTAKE PROCESS.

A. AS PART OF THEIR NORMAL -- CAN YOU DEFINE WHAT INTAKE PROCESS IS?

Q. LET ME ASK YOU THE QUESTION A DIFFERENT WAY.

IF AN AGENCY IS EVALUATING A FAMILY THAT CAME TO THEM ON THEIR OWN, THAT TYPE OF FOSTER FAMILY IS NOT ONE THAT WAS REFERRED TO THE AGENCY BY DHS, IS IT?

A. NOT NECESSARILY.

Q. AND KIN CARE IS A SITUATION WHERE DHS WOULD REFER AN ENTIRE FAMILY, CORRECT?

A. YES.

Q. AND YOU TESTIFIED EARLIER THAT DHS, WHEN IT MAKES REFERRALS, WILL IDENTIFY THE NEEDS OF THE FAMILY AS WELL AS THE NEEDS OF THE CHILD TO TRY TO FIND THE ABILITY TO MEET THOSE NEEDS, CORRECT?

A. THE NEEDS OF THE CHILD. SO WE DETERMINE THE NEEDS OF THE CHILD AND WHETHER OR NOT THE FOSTER PARENT OR THE KINSHIP CAREGIVER IS ABLE TO MEET THOSE NEEDS.

SO WE LEAD WITH THE NEEDS OF THE PARTICULAR CHILD.

Q. LET'S ASSUME THAT THERE WAS A FAMILY THAT WAS PRIMARILY SPANISH SPEAKING. DHS WOULD CONSIDER THAT IN A KIN CARE REFERRAL AS FAR AS REFERRING TO AN AGENCY THAT WAS ABLE TO COMMUNICATE WITH THE FAMILY AND THE CHILD, CORRECT?

A. IT WOULD DEPEND.

Q. SO YOU WOULD REFER A SPANISH-SPEAKING FAMILY TO ANOTHER AGENCY THAT DIDN'T COMMUNICATE WITH THEM?

A. IF THE PARTICULAR AGENCY HAS SPANISH-SPEAKING STAFF, THEN WE WOULD MAKE THAT REFERRAL TO THAT PARTICULAR AGENCY.

Q. AND THAT WOULD BE A CONSIDERATION?

A. THAT WOULD BE A CONSIDERATION.

Q. THIS PARAGRAPH ALSO REFERS TO A PROVIDER'S SCOPE OF SERVICES. PROVIDERS ARE REQUIRED TO COMPLY WITH STATE LAW, CORRECT?

A. WHICH DOCUMENT ARE YOU REFERRING TO?

Q. IF YOU WANT TO TURN TO -- THIS IS ECF 13-4 OF THE DOCUMENT YOU HAVE IN FRONT OF YOU AT PAGES 14 TO 15.

MS. OLIVER: COULD COUNSEL PLEASE STATE AGAIN WHICH DOCUMENT YOU ARE REFERRING TO.

MS. BARCLAY: THIS IS THE CONTRACT.

MS. OLIVER: AND THE SPECIFIC PAGE AND SECTION?

MS. BARCLAY: IT IS ECF 13-4, AND IT'S PAGES 14 AND 15.

BY MS. BARCLAY:

Q. MS. ALI, WOULD IT BE HELPFUL IF I --

A. CAN YOU JUST MAKE SURE I HAVE THE CORRECT -- YES, PLEASE.

Q. MS. ALI, THIS PARAGRAPH SAYS THAT PROVIDERS SHALL NOT REJECT A CHILD OR FAMILY FOR SERVICES BASED UPON THE LOCATION OR CONDITION OF THE FAMILY'S RESIDENCE, THEIR ENVIRONMENTAL OR SOCIAL CONDITION OR FOR ANY OTHER REASON IF THE PROFILE OF SUCH CHILD OR FAMILY IS CONSISTENT WITH PROVIDER'S SCOPE OF SERVICES.

MY QUESTION TO YOU EARLIER IS THAT A PROVIDER'S SCOPE OF SERVICES INCLUDES COMPLYING WITH APPLICABLE STATE LAWS, CORRECT?

A. YES.

THE COURT: DO YOU UNDERSTAND THE QUESTION?

THE WITNESS: YES.

BY MS. BARCLAY:

Q. THIS PROVISION DOES NOT PREVENT AGENCIES FROM REFERRING FAMILIES TO AN AGENCY THAT WOULD BE A BETTER FIT FOR THE FAMILY, DOES IT?

A. THE AGENCY IS NOT --

MS. OLIVER: OBJECTION.

THE COURT: OVERRULED.

ANSWER THE QUESTION.

THE WITNESS: REPEAT THE QUESTION, PLEASE.

BY MS. BARCLAY:

Q. THIS PROVISION THAT WE JUST READ DOES NOT PREVENT AGENCIES FROM REFERRING FAMILIES TO ANOTHER AGENCY THAT WOULD BE A BETTER FIT FOR THE FAMILY, DOES IT?

A. SO PROVIDER AGENCIES WOULD NOT REFER A FAMILY TO -- OR A CHILD TO ANOTHER AGENCY, AS I TESTIFIED EARLIER, THAT THE CENTRAL REFERRAL UNIT IS A UNIT IN THE DEPARTMENT OF HUMAN SERVICES THAT MAKES REFERRALS WHEN YOU ARE GOING OUTSIDE OF A PARTICULAR AGENCY.

Q. I UNDERSTAND THAT. I AM NOT ASKING YOU ABOUT A DHS REFERRAL OF A CHILD.

IF A PROSPECTIVE FOSTER PARENT APPROACHES AN AGENCY ABOUT BEING CONSIDERED FOR THE HOME STUDY CERTIFICATION PROCESS, THIS CONTRACT PROVISION DOES NOT PREVENT THAT AGENCY FROM SENDING THAT FAMILY OR ALLOWING THEM TO KNOW ABOUT ANOTHER AGENCY THAT WOULD BE A BETTER FIT FOR THE FAMILY, DOES THAT PROVISION?

MS. OLIVER: OBJECTION, YOUR HONOR. I RENEW MY OBJECTION WITH REGARD TO THE CONTRACT --

THE COURT: I THINK THAT'S AN UNFAIR

QUESTION BECAUSE IT'S ASKING FOR A NEGATIVE. SO I AM GOING TO SUSTAIN THE OBJECTION.

MS. BARCLAY: LET ME SEE IF I CAN WORD THAT A LITTLE DIFFERENTLY, YOUR HONOR.

BY MS. BARCLAY:

Q. SOMETIMES FAMILIES MIGHT COME TO AN AGENCY NOT AS A DHS REFERRAL BUT ON THEIR OWN. WE DISCUSSED THAT EARLIER, RIGHT?

A. YES.

Q. AND IF THAT FAMILY COMES TO AN AGENCY, THIS CONTRACT PROVISION DOES NOT SAY ANYTHING ABOUT WHETHER OR NOT THE AGENCY COULD GIVE THE FAMILY INFORMATION ABOUT ANOTHER AGENCY BETTER ABLE TO MEET THEIR NEEDS.

MS. OLIVER: OBJECTION, YOUR HONOR. QUESTIONS WITH REGARD TO THE CONTRACT ARE CONCLUSIONS OF LAW.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. DO YOU ENFORCE THIS CONTRACT PROVISION IN AN EVENHANDED MANNER?

THE COURT: WHAT CONTRACT PROVISION?

MS. BARCLAY: THIS CONTRACT, YOUR HONOR.

MS. OLIVER: OBJECTION, YOUR HONOR. IT'S AN IMPROPER QUESTION FOR THIS WITNESS. SHE DOES NOT ENFORCE THE CONTRACT.

MS. BARCLAY: YOUR HONOR, THIS WITNESS HAS TESTIFIED THAT SHE IS FAMILIAR WITH DHS'S OPERATIONS, POLICIES, AND PROCEDURES, INCLUDING THE PRACTICES THAT ARE THE SUBJECT OF THIS ACTION. AND UNDER THE FREE EXERCISE CLAUSE, ONE OF THE VERY IMPORTANT LEGAL QUESTIONS IS NOT JUST WHAT A CONTRACT PROVISION OR POLICY SAYS IN A VACUUM BUT HOW THE RELEVANT OFFICIALS ENFORCE THAT POLICY AND IF THEY ENFORCE IT IN AN EVEN MANNER. SO IT'S VERY RELEVANT TO THE QUESTIONS AT ISSUE IN THIS CASE.

MS. OLIVER: YOUR HONOR, I SUBMIT THAT SHE IS NOT THE RELEVANT OFFICIAL. IT'S NOT AN APPROPRIATE QUESTION FOR THIS WITNESS.

THE COURT: WELL, SHE IS AN APPROPRIATE WITNESS AS FAR AS THE POLICY. BUT I DON'T KNOW WHETHER OR NOT THERE IS AN ISSUE OF EQUAL APPLICATION. I MEAN, AS FAR AS SHE IS CONCERNED, SHE IS THE APPROPRIATE PERSON.

BY MS. BARCLAY:

Q. DHS WOULD NOT PREVENT AN AGENCY FROM LETTING A PROSPECTIVE FOSTER FAMILY KNOW ABOUT ANOTHER AGENCY THAT MIGHT BETTER MEET THEIR NEEDS?

A. DHS WILL HAVE A PROBLEM WITH THAT. IF A POTENTIAL FOSTER PARENT SEEKS OUT, AS YOU INDICATED, ON THEIR OWN AND CONTACT A PROVIDER -- A FOSTER CARE

PROVIDER AGENCY WANTING TO BECOME A FOSTER PARENT, WE WOULD EXPECT THE FOSTER CARE PROVIDER TO TRAIN AND CERTIFY THAT FOSTER PARENT.

Q. NO MATTER WHAT?

A. IF IT'S IN -- IF IT'S ALIGNED WITH THE 3700 REGULATIONS.

Q. THE 3700 REGULATIONS MEANING?

A. THE FOSTER CARE REGULATIONS. SO WE EXPECT FOR THE FOSTER CARE PROVIDER AGENCY -- AS A FOSTER CARE PROVIDER AGENCY, WE EXPECT YOU TO RECRUIT, TO TRAIN, AND TO CERTIFY POTENTIAL FOSTER PARENTS.

Q. AND YOUR POSITION IS THAT IT WOULD VIOLATE THOSE REGULATIONS IF AN AGENCY LET PROSPECTIVE FOSTER PARENTS KNOW THAT A DIFFERENT AGENCY WOULD BE A BETTER FIT FOR THEM.

A. BECAUSE IT'S THE FOSTER PARENTS' CHOICE. SO IF IN THE FOSTER PARENT SOUGHT OUT A PARTICULAR PROVIDER AGENCY, THAT IS THE FOSTER CARE PROVIDER AGENCY THAT THE FOSTER PARENT WANTS TO WORK WITH. SO WE WOULD EXPECT THE FOSTER CARE PROVIDER AGENCY TO TRAIN AND CERTIFY THEM.

Q. AND IT WOULD BE A VIOLATION OF DHS POLICY IF THAT AGENCY REFERRED THEM TO A DIFFERENT AGENCY FOR ANY REASON?

THE COURT: WELL, THAT'S A KIND OF A

BROAD QUESTION.

BY MS. BARCLAY:

Q. IT WOULD BE A VIOLATION OF DHS POLICY IF THEY REFERRED THAT FAMILY TO ANOTHER AGENCY THAT THEY THOUGHT WOULD BE A BETTER FIT FOR THAT FAMILY?

A. IF THAT REFERRAL -- DEFINE YOUR REFERRAL. WHAT ARE YOU TALKING -- DEFINE YOUR REFERRAL.

Q. IF THAT AGENCY TOLD THE FAMILY THAT ANOTHER AGENCY WOULD BE A BETTER FIT FOR THEM, AND SO -- SENT THAT FAMILY TO A DIFFERENT AGENCY, IT'S YOUR POSITION THAT THIS WOULD VIOLATE DHS POLICY?

A. YES.

Q. SO THE CONTRACT'S PROVISION ALSO ALLOWS THE COMMISSIONER TO MAKE EXCEPTIONS IN HIS OR HER SOLE DISCRETION, CORRECT?

MS. OLIVER: OBJECTION. QUESTION IS REGARDING THE CONTRACT, YOUR HONOR.

MS. BARCLAY: I CAN MOVE ON, YOUR HONOR.

THE COURT: YES, PLEASE.

BY MS. BARCLAY:

Q. ARE YOU AWARE OF DHS MAKING EXCEPTIONS TO THIS POLICY IN THE PAST?

A. NO, I AM NOT.

MS. OLIVER: OBJECTION TO WHAT POLICY.

MS. BARCLAY: THE CONTRACT PROVISION THAT

WE HAVE BEEN DISCUSSING.

THE COURT: WELL, I THINK YOU NEED TO BE MORE SPECIFIC.

BY MS. BARCLAY:

Q. YOU TESTIFIED EARLIER THAT IF AN AGENCY REFERRED A FAMILY TO A DIFFERENT AGENCY BECAUSE THEY THOUGHT IT WOULD BE A BETTER FIT, THAT WOULD BE A VIOLATION OF DHS POLICY. AND I AM ASKING, HAS DHS MADE EXCEPTIONS TO THAT POLICY, THAT YOU ARE AWARE OF, IN THE PAST?

MS. OLIVER: OBJECTION. I BELIEVE THAT COUNSEL IS MISCHARACTERIZING HER TESTIMONY.

THE COURT: OVERRULED.

CAN YOU ANSWER THE QUESTION?

THE WITNESS: CAN SHE ASK IT AGAIN?

BY MS. BARCLAY:

Q. YOU TESTIFIED THAT IF A FAMILY APPROACHED AN AGENCY AND THE AGENCY REFERRED THEM TO A DIFFERENT AGENCY AS BEING A BETTER FIT FOR THAT FAMILY, THAT WOULD BE A VIOLATION OF DHS POLICY. AND I AM ASKING, ARE YOU AWARE OF TIMES IN THE PAST WHERE DHS MADE AN EXCEPTION TO THAT POLICY?

A. I AM NOT AWARE.

Q. ONLY CERTAIN AGENCIES ARE ALLOWED TO CARE FOR A FOSTER CHILD WITH CERTAIN BEHAVIORAL HEALTH ISSUES, CORRECT?

A. IT'S NOT TRUE.

Q. BEHAVIOR ISSUES ARE ONES THAT REQUIRE ADDITIONAL EXPERTISE PROVIDED BY CERTAIN AGENCIES, CORRECT?

A. DEPENDING ON THE LEVEL OF BEHAVIORAL HEALTH NEEDS OF THE YOUNG PERSON.

Q. BUT YOU HAVE PREVIOUSLY SAID UNDER OATH THAT BEHAVIORAL ISSUES REQUIRE ADDITIONAL EXPERTISE THAT CAN BETTER BE PROVIDED SOMETIMES BY ANOTHER AGENCY.

A. I ACTUALLY SAID SPECIALIZED BEHAVIORAL HEALTH, WHICH IS DIFFERENT FROM THE BROADER BEHAVIORAL HEALTH. YOUNG PEOPLE WHO COME INTO PLACEMENT BECAUSE OF THE TRAUMA THAT THEY SUFFER MORE OFTEN THAN NOT HAVE SOME BEHAVIORAL HEALTH NEEDS, WHICH WOULD BE SEPARATE AND APART FROM SPECIALIZED BEHAVIORAL HEALTH, WHICH IS OFTENTIMES A DIAGNOSIS, PRESCRIPTION MEDICATION, THE FOSTER PARENT HAS TO MAINTAIN MEDICATION LOGS. SO THAT IS DIFFERENT FROM JUST BEHAVIORAL HEALTH.

Q. OKAY. SO SPECIALIZED BEHAVIORAL HEALTH IS AN ISSUE THAT REQUIRES ADDITIONAL EXPERTISE BY AN AGENCY?

A. YES.

Q. SUCH AGENCIES HAVE TO OFFER PARENTS SPECIALIZED TRAINING, RIGHT?

A. YES.

Q. THEY ALSO HAVE TO MEET ADDITIONAL REQUIREMENTS WITH REGARD TO STAFF?

A. YES.

Q. THESE AGENCIES HAVE AN ADD-ON CONTRACT WITH THE CITY THAT LETS THEM PROVIDE THOSE SPECIALIZED BEHAVIORAL HEALTH SERVICES FOR THOSE CHILDREN, CORRECT?

A. YES.

Q. FOR INSTANCE, ONE AGENCY THAT HAS THOSE BEHAVIORAL HEALTH ADD-ON CONTRACTS IS DEVEREUX?

A. YES.

Q. SOME FOSTER PARENTS MIGHT ONLY BE INTERESTED IN FOSTERING A CHILD WITH THOSE SORT OF SPECIALIZED BEHAVIORAL ISSUES. IF SUCH A PARENT SHOWED UP AT AN AGENCY WITHOUT THAT SPECIALTY IN THAT CONTRACT, THEN THAT AGENCY WOULD NEED TO REFER THAT FAMILY TO AN AGENCY WITH A CONTRACT LIKE DEVERO, RIGHT?

A. IF THE FOSTER PARENT IS REQUESTING THAT.

Q. RIGHT.

A. YES.

Q. IF THE FOSTER PARENT IS REQUESTING TO FOSTER A CHILD WITH SPECIALIZED BEHAVIORAL HEALTH ISSUES.

A. SO WHAT WE WOULD ASK THE FOSTER CARE PROVIDER AGENCY TO DO IS EXPLAIN TO THE POTENTIAL FOSTER PARENT ABOUT THE TYPE OF YOUNG PEOPLE THAT THEY PROVIDE FOSTER CARE FOR, AND IF THE FOSTER PARENT DOES NOT WANT TO FOSTER WITH THAT PARTICULAR AGENCY, THEN IT WOULD BE THEIR CHOICE TO FOSTER FOR ANOTHER AGENCY.

Q. AND SO IF THEY ONLY WANTED TO FOSTER YOUNG PEOPLE WITH THAT SPECIALIZED BEHAVIORAL HEALTH ISSUE, THEY WOULD NEED TO BE REFERRED TO AN AGENCY WITH THAT SPECIALTY?

A. YES.

Q. HAVE YOU GRANTED A FORMAL EXCEPTION FOR THESE TYPES OF REFERRALS?

THE COURT: FORMAL EXCEPTION, THAT IS ASSUMING THAT AN EXCEPTION IS NECESSARY OR REQUIRED.

MS. BARCLAY: I AM NOT ASSUMING THAT AN EXCEPTION IS REQUIRED. I AM ASKING IF AN EXCEPTION HAS EVER BEEN GRANTED. THAT YOU ARE AWARE OF.

THE COURT: WELL, UNDER THE CIRCUMSTANCES THAT YOU HAVE OUTLINED, YOU ARE ASSUMING THAT ONE IS REQUIRED.

BY MS. BARCLAY:

Q. IS AN EXCEPTION REQUIRED FROM THE DHS POLICY WE WERE DISCUSSING EARLIER?

THE COURT: IF?

BY MS. BARCLAY:

Q. TO REFER A FAMILY TO A DIFFERENT AGENCY WITH THE SPECIALIZED BEHAVIORAL HEALTH SPECIALTY.

A. I GUESS THE DIFFICULTY THAT I AM HAVING IS THAT THIS SPEAKS TO FOSTER PARENTS WHO ARE -- WHO -- INDIVIDUALS WHO ARE ALREADY FOSTER PARENTS AND NOT A

POTENTIAL.

Q. NO, MY HYPOTHETICAL IS ASSUMING PROSPECTIVE FOSTER PARENTS WHO ARE ONLY INTERESTED IN FOSTERING YOUTH WITH SPECIALIZED BEHAVIORAL HEALTH ISSUES. SO IT DOES NOT REQUIRE A FORMAL EXCEPTION IN ORDER FOR AN AGENCY TO REFER THEM TO A DIFFERENT AGENCY IF THEY COULD PROVIDE THAT BEHAVIORAL HEALTH EXPERTISE, DOES IT?

A. NO.

Q. ONLY CERTAIN AGENCIES ARE ALLOWED TO CARE FOR FOSTER CHILDREN WITH CERTAIN SPECIALIZED MEDICAL ISSUES, RIGHT?

A. DEPENDS, AGAIN. AND IT DEPENDS ON THE LEVEL OF MEDICAL NEED. FOR EXAMPLE, A MEDICAL ONE IN WHICH A YOUNG PERSON MAY HAVE ASTHMA, FOR EXAMPLE, COULD BE CARED FOR BY A GENERAL FOSTER CARE FOSTER PARENT.

Q. SO -- BUT THERE ARE SOME MEDICAL NEEDS THAT CAN ONLY BE PROVIDED FOR BY AN AGENCY WITH THAT SPECIALTY, CORRECT?

A. YES.

Q. AND THESE AGENCIES ALSO HAVE TO RECEIVE AN ADDITIONAL LICENSE THROUGH THE STATE OFFICE OF MEDICAL ASSISTANCE?

A. YES.

Q. THEY THEN RECEIVE AN ADDITIONAL LINE ITEM, ADD-ON ON THE FOSTER CARE CONTRACT, TO PROVIDE THESE

SPECIAL MEDICAL SERVICES, RIGHT?

A. I AM NOT COMPLETELY FAMILIAR WITH THE LINE ITEM.

Q. JEWISH FAMILY CHILDREN SERVICES IS ONE AGENCY THAT HAS THIS MEDICAL EXPERTISE THAT THEY PROVIDE FOR FAMILIES, CORRECT?

A. YES.

Q. SOME FOSTER PARENTS -- PROSPECTIVE FOSTER PARENTS MIGHT ONLY WANT TO FOSTER A CHILD WITH PARTICULAR MEDICAL ISSUES, RIGHT?

A. YES.

Q. IF SUCH A PARENT SHOWED UP IN AN AGENCY THAT DIDN'T HAVE THIS SPECIAL CONTRACT, THEY WOULD NEED TO BE REFERRED TO AN AGENCY LIKE JEWISH FAMILY THAT DOES HAVE THAT EXPERTISE, CORRECT?

A. WE WOULD ASK THE FOSTER CARE PROVIDER AGENCY TO EXPLAIN THE CHILDREN THAT THEY SERVICE, SOME OF WHICH WILL BE MEDICAL LEVEL ONE, AND LET THE FOSTER PARENT DECIDE WHETHER OR NOT THEY WANT TO TRANSFER -- POTENTIAL FOSTER PARENT, WHETHER OR NOT THEY WANT TO PROVIDE FOSTER CARE FOR MEDICAL AGENCY.

Q. BUT IF THEY ONLY WANTED TO FOSTER YOUTH WITH THIS SPECIALIZED MEDICAL ISSUE, THERE ARE SOME AGENCIES THAT THEY CANNOT RECEIVE THAT SERVICE FROM, CORRECT?

A. CORRECT.

Q. AND SO IF THEY WANTED TO BE FOSTER PARENTS, THEY

WOULD NEED TO BE REFERRED TO A DIFFERENT AGENCY, LIKE JEWISH FAMILY CHILDREN, THAT HAS THAT SPECIALTY?

A. YES.

THE COURT: THE BIGGEST PROBLEM IS I THINK YOU ARE DISAGREEING WHAT IS A REFERRAL.

THE WITNESS: YES.

THE COURT: I MEAN, WHAT IS IT YOU ARE TRYING TO DO -- AND I THINK IT'S INAPPROPRIATE -- IS TO GET THIS WITNESS TO USE THE SAME WORDS THAT YOU ARE USING AND MEAN THE SAME THING. SHE CLEARLY IS NOT ON THE SAME WAVELENGTH AS YOU WHEN TALKING ABOUT REFERRAL. AND I THINK THAT'S WHERE THE CONFUSION LIES.

BY MS. BARCLAY:

Q. SO THERE ARE TWO DIFFERENT WAYS THAT I AM AWARE OF THAT THE WORD "REFERRAL" CAN BE USED. IT CAN MEAN REFERRAL FROM DHS TO AGENCIES, RIGHT, FROM YOUR CENTRAL REFERRAL UNIT?

A. YES.

Q. AND SO FOR EASE OF REFERENCE, WHAT I HAVE BEEN TALKING ABOUT IS THAT SOMETIMES AGENCIES CAN PROVIDE ADDITIONAL INFORMATION TO FAMILIES ABOUT OTHER AGENCIES THAT WOULD SERVE THEIR NEEDS AND GIVE THEM THE CHOICE TO GO TO THAT AGENCY?

A. AND I AM INVISIBLE TO THAT PROCESS.

Q. AND SO WHAT I AM EXPLAINING IS THAT -- WHAT I

UNDERSTAND, IF A FAMILY WENT TO -- WANTED TO ONLY FOSTER CHILDREN WITH A SPECIAL MEDICAL CONDITION, FOR EXAMPLE, AND IF THEY APPROACHED AN AGENCY THAT DOES NOT HAVE THAT SPECIALTY, IT WOULD BE APPROPRIATE FOR THAT AGENCY TO GIVE THEM INFORMATION ABOUT OTHER AGENCIES THAT WOULD BETTER MEET THEIR NEEDS AND GIVE THE FAMILY THE CHOICE TO GO TO THAT AGENCY.

THE COURT: WELL, THAT'S NOT WHAT HAPPENED HERE. THAT'S SPECULATIVE.

MS. BARCLAY: I AM TRYING TO UNDERSTAND WHAT DHS'S POSITION IS ON THE APPLICATION OF POLICY, YOUR HONOR.

THE COURT: I THINK THAT THE WITNESS HAS ALREADY STATED WHAT DHS'S POSITION IS. THE POLICY THAT YOU ARE ASKING ABOUT IS PURELY SPECULATIVE. IT'S NOT THE SITUATION THAT WE HAVE HERE. AT LEAST I HAVE NOT HEARD ANYTHING ABOUT SUCH A SITUATION.

MS. BARCLAY: MRS. SIMMS-BUSCH DID TESTIFY ABOUT REFERRALS THAT WERE MADE BY AGENCIES, ABOUT USING THE WORD REFERRAL; SHE MEANT SENDING FAMILIES TO OTHER AGENCIES THAT BETTER MET THEIR NEEDS BECAUSE THOSE FAMILIES WANTED TO CARE FOR CHILDREN WITH MEDICAL EXPERTISE.

THAT IS RELEVANT TO THE WAY IN WHICH THIS POLICY IS APPLIED VIS-À-VIS OTHER TYPES OF SITUATIONS

WHERE AN AGENCY MIGHT SEND A FAMILY TO A DIFFERENT AGENCY FOR A BETTER FIT, YOUR HONOR.

THE COURT: I AM GOING TO SUSTAIN THE OBJECTION. THERE IS NO OBJECTION. I AM GOING TO.

MS. OLIVER: OBJECTION, YOUR HONOR.

THE COURT: I AM GOING TO SUSTAIN THE OBJECTION.

BY MS. BARCLAY:

Q. SOME FOSTER AGENCIES THAT DHS WORKS WITH HAS ADVERTISED THAT THEY ONLY SERVE KIN CARE POPULATIONS, CORRECT?

A. I DON'T KNOW OF ANY FOSTER CARE PROVIDER THAT DHS PROVIDES FOSTER CARE WITH THAT ONLY DOES KIN. FOSTER CARE PROVIDER AGENCIES DO BOTH KIN AND FOSTER CARE.

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR?

THE COURT: YES.

MS. BARCLAY: I AM ACTUALLY GOING TO MOVE ON, YOUR HONOR.

THE COURT: OKAY.

BY MS. BARCLAY:

Q. SOME AGENCIES HAVE AN EXPERTISE IN CERTAIN LATINO COMMUNITIES, CORRECT?

A. YES.

Q. FOR EXAMPLE, CONCILIO WAS ONE AGENCY THAT DHS WORKS WITH WITH THIS EXPERTISE?
A. YES.
Q. ANOTHER AGENCY WITH THIS SPECIALTY IS APM?
A. YES.
Q. IF A SPANISH-SPEAKING PROSPECTIVE FOSTER FAMILY APPROACHED AN AGENCY THAT DIDN'T HAVE SPANISH-SPEAKING SOCIAL WORKERS, IT WOULD BE APPROPRIATE FOR THE AGENCY TO TELL THE FAMILY ABOUT ANOTHER AGENCY, LIKE CONCILIO, THAT CAN BETTER MEET THEIR NEEDS, CORRECT?
A. WE EXPECT FOR FOSTER CARE PROVIDER AGENCIES, SINCE WE SERVICE THE ENTIRE CITY OF PHILADELPHIA, TO PROVIDE INTERPRETING SERVICES FOR FOSTER PARENTS AND BIOLOGICAL PARENTS. WE DON'T EXPECT THEM TO NECESSARILY REFER TO A SPANISH-SPEAKING AGENCY.
Q. BUT IF AN AGENCY DID MAKE THAT REFERRAL, THAT WOULD BE APPROPRIATE IF THEY THOUGHT ANOTHER AGENCY COULD BETTER MEET THE NEEDS OF THE SPANISH-SPEAKING FAMILY, RIGHT?
A. IF THE FOSTER PARENT CHOOSES TO GO TO A DIFFERENT AGENCY. IF THE FOSTER PARENT APPROACHED THAT FOSTER CARE PROVIDER AGENCY AND WANTED TO BE A FOSTER PARENT, WE EXPECT THE FOSTER CARE PROVIDER AGENCY TO TRAIN AND CERTIFY THAT FOSTER PARENT.
Q. SO IF AN AGENCY SAID, WE DON'T THINK WE WOULD BE

THE BEST FIT FOR YOU BECAUSE WE DON'T HAVE THE LANGUAGE EXPERTISE TO BEST SERVE YOUR NEEDS, AND SO WE ARE NOT ABLE TO PROVIDE CERTIFICATION FOR YOU, IF AN AGENCY DID THAT, YOU THINK THAT WOULD BE A VIOLATION OF DHS EXPECTATIONS?

A. IF THE AGENCY WAS TO DO THAT, THE AGENCY ALSO NEEDS TO ASK THE FOSTER PARENT WHAT IS HIS OR HER CHOICE AND ALLOW THE FOSTER PARENT TO MAKE THAT DECISION.

Q. IF THE FOSTER PARENT WANTED TO WORK WITH AN AGENCY AND THOUGHT THAT THE AGENCY COULD NOT MEET THEIR NEEDS AND THE AGENCY SAID, WE DON'T THINK WE ARE ABLE TO MEET THEIR LANGUAGE NEEDS, BUT WE CAN SEND YOU TO ANOTHER AGENCY THAT DOES, AFTER EXPLAINING TO THE FAMILY WHY THAT WAS THE CASE, THAT WOULD BE APPROPRIATE, RIGHT?

MS. OLIVER: OBJECTION, YOUR HONOR. I BELIEVE THAT THIS LINE OF QUESTIONING HAS BEEN ASKED AND ANSWERED NUMEROUS TIMES.

THE COURT: SUSTAINED. SUSTAINED.

BY MS. BARCLAY:

Q. FEDERAL LAW REQUIRES THAT NATIVE AMERICAN CHILDREN GENERALLY BE PLACED WITH THE TRIBAL MEMBERS OR INDIVIDUALS OF NATIVE AMERICAN ANCESTRY, RIGHT?

MS. OLIVER: OBJECTION AS TO WHAT FEDERAL LAW REQUIRES.

MS. BARCLAY: THE WITNESS'S KNOWLEDGE

ABOUT WHETHER OR NOT IT'S APPROPRIATE TO SEND A FOSTER FAMILY TO A DIFFERENT AGENCY IS RELEVANT, YOUR HONOR.

THE COURT: OVERRULED. SHE CAN ANSWER.

THE WITNESS: REPEAT THE QUESTION, PLEASE.

BY MS. BARCLAY:

Q. FEDERAL LAW REQUIRES NATIVE AMERICAN CHILDREN GENERALLY TO BE PLACED WITH TRIBAL MEMBERS OR INDIVIDUALS WITH NATIVE AMERICAN ANCESTRY, RIGHT?

A. YES.

Q. SOME AGENCIES IN PENNSYLVANIA SPECIALIZE IN PLACING NATIVE AMERICAN CHILDREN, RIGHT?

A. I CAN ONLY SPEAK TO PHILADELPHIA.

Q. YOU ARE NOT AWARE OF OTHER AGENCIES THAT HAVE THAT SPECIALTY?

A. NOT IN PHILADELPHIA.

Q. ARE THERE ANY SUCH AGENCIES IN PHILADELPHIA, THAT YOU ARE AWARE OF?

A. NO. THERE AREN'T ANY, THAT I AM AWARE OF.

Q. SO IF A NON-NATIVE AMERICAN FAMILY WENT TO AN AGENCY IN PHILADELPHIA WANTING TO FOSTER A NATIVE AMERICAN CHILD, THEY WOULD BE UNABLE TO DO SO, CORRECT?

A. REPEAT THE QUESTION.

MS. OLIVER: OBJECTION; CALLS FOR SPECULATION.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. DHS GUIDELINES EMPHASIZE THE IMPORTANCE OF GEOGRAPHIC PROXIMITY FOR FOSTER CARE PLACEMENTS, CORRECT?

A. REPEAT THAT.

Q. DHS GUIDELINES EMPHASIZE THE IMPORTANCE OF GEOGRAPHIC PROXIMITY FOR FOSTER CARE PLACEMENTS, CORRECT?

A. I AM TRYING TO DETERMINE WHAT ARE YOU SAYING. WHAT ARE YOU CITING?

Q. YOU SAID EARLIER IN YOUR TESTIMONY THAT GEOGRAPHY IS IMPORTANT FOR CONSIDERATION OF THE PLACEMENT OF THE CHILD BECAUSE YOU WANT TO KEEP THE CHILD IN THEIR COMMUNITY, CORRECT?

A. YES. HOWEVER, I ALSO TESTIFIED THAT IF, IN FACT, THERE WAS A BETTER FIT OUTSIDE OF THE COMMUNITY, THAT WE WOULD PLACE THE CHILD OUTSIDE OF THEIR COMMUNITY. AND THEN IT WOULD BE THE CORE CASE MANAGER'S RESPONSIBILITY TO ENSURE THAT THE CHILD MAINTAINED EDUCATIONAL STABILITY AS WELL AS BEHAVIORAL HEALTH AND MEDICAL STABILITY.

Q. YOU SAID THAT 52 PERCENT OF CHILDREN ARE WITHIN 5 MILES OF THEIR ORIGINAL HOME, RIGHT?

A. YES.

Q. AND SO SOMETIMES REFERRALS CAN BE MADE OR FAMILIES ARE SENT TO OTHER AGENCIES WHERE IT WILL BE CLOSER TO THE CHILD'S HOME, IF THAT WOULD BE IN THE CHILD'S BEST INTEREST, RIGHT?

A. NO.

Q. YOU ARE NOT AWARE OF ANY SUCH REFERRALS FOR GEOGRAPHIC REASONS?

A. NO. WE DON'T DO REFERRALS FOR GEOGRAPHIC REASONS. OUR FOSTER CARE PROVIDER AGENCIES ARE CITYWIDE. SO IF AFTER THE CENTRAL REFERRAL UNIT SENDS -- OR MAKES A LEVEL OF CARE DECISION AND SENDS OVER THE REFERRAL TO ALL OF THE FOSTER CARE AGENCIES THAT PROVIDE THAT LEVEL OF SERVICE, THE FOSTER CARE PROVIDER AGENCIES WILL DETERMINE THE BEST FIT FOR THE MOST APPROPRIATE -- THE MOST APPROPRIATE FOSTER PARENT FOR THAT PARTICULAR CHILD.

SO WE WILL NOT -- IF THE FOSTER PARENT IS AN APPROPRIATE PLACEMENT, THEN WE WILL PLACE THAT CHILD WITH THEIR FOSTER PARENT AND, AGAIN, EXPECT THAT THE SERVICES THAT THE CHILD RECEIVE IN THEIR COMMUNITY, WHICH IS PRIMARILY THEIR EDUCATIONAL NEEDS, TO ENSURE THAT THAT CHILD STAYS IN THEIR SCHOOL, WE CALL THEIR SCHOOL OF ORIGIN.

Q. IF A FAMILY WANTED TO FOSTER A CHILD IN THEIR OWN NEIGHBORHOOD, BUT THEY APPROACHED A FOSTER AGENCY ON

THE OTHER SIDE OF THE CITY, WOULD IT EVER BE APPROPRIATE FOR THE FOSTER AGENCIES THEY APPROACHED TO SEND THEM TO AN AGENCY THAT IS CLOSER TO THEIR OWN NEIGHBORHOOD?

A. SO WHAT I WOULD SAY IN RESPONSE TO THAT IS THAT FOSTER CARE PROVIDERS WANT TO INCREASE THEIR CAPACITY WITH RESOURCE EXPERIENCE WITH FOSTER PARENTS. THEREFORE, THE FOSTER CARE PROVIDER WOULD TRY TO ACCOMMODATE THEIR FOSTER PARENT. THEY JUST WOULD NOT REFER THEM TO ANOTHER AGENCY THAT IS CLOSER.

WHAT I MEAN BY ACCOMMODATING, THEY WOULD, IF POSSIBLE, PROVIDE THE TRAINING THAT THE FOSTER PARENT NEEDS IN THEIR OWN HOME AS OPPOSED TO HAVING THE FOSTER PARENT TRAVEL ACROSS THE CITY. IF IT IS THE FOSTER PARENT'S DESIRE, THEN THAT'S ANOTHER QUESTION.

MS. BARCLAY: ONE MOMENT, YOUR HONOR.

BY MS. BARCLAY:

Q. YOU HAVE REPRESENTED TO THIS COURT THAT YOU'RE COMMITTED TO ENSURING PLACEMENT IN A CHILD'S BEST INTEREST, CORRECT?

A. YES.

Q. AND DHS LEADERSHIP HAS SAID THAT THEY WILL CONTINUE TO CONSIDER ANY REQUESTS INDICATING THAT A PLACEMENT WITH CATHOLIC IS NOT IN A CHILD'S PARTICULAR BEST INTEREST?

A. YES.

Q. THIS WOULD INCLUDE PLACING A CHILD WITH A FOSTER FAMILY WITH CATHOLIC, WHICH HAS ALREADY CARED FOR THE REST OF THE CHILD'S FAMILY?

A. YES.

Q. THIS COULD ALSO INCLUDE PLACING THE SIBLINGS OF A CATHOLIC FAMILY THAT HAS A PREEXISTING RELATIONSHIP WITH A CHILD?

A. YES.

Q. YOU HAVE NEVER COMMUNICATED IN WRITING TO OTHER CUA'S THAT THEY ARE ALLOWED TO REFER CHILDREN TO CATHOLIC IN THESE INSTANCES, HAVE YOU?

MS. OLIVER: OBJECTION.

THE COURT: OVERRULED.

THE WITNESS: THE CUA'S DO NOT MAKE REFERRALS TO OTHER FOSTER CARE AGENCIES. THOSE REFERRALS ARE MADE BY WAY OF THE CENTRAL REFERRAL UNIT.

BY MS. BARCLAY:

Q. BUT CUA'S DO PROVIDE INPUT FROM THE CENTRAL REFERRAL UNIT.

A. THEY PROVIDE INPUT BASED ON THE NEEDS OF THE PARTICULAR CHILD.

Q. RIGHT.

A. THEY PROVIDE INPUT ABOUT THE CHILD.

Q. THEY PROVIDE INPUT ABOUT WHAT PLACEMENT IT WOULD BE IN THE BEST INTEREST OF THE CHILD, CORRECT?

A. WHO PROVIDES INFORMATION -- THE CUA CASE MANAGERS PROVIDE INPUT ABOUT THE CHILD'S NEEDS. THE CENTRAL REFERRAL UNIT IN CONCERT WITH COMMUNITY BEHAVIORAL HEALTH, WHICH IS THE MANAGED CARE ORGANIZATIONS, ARE THE INDIVIDUALS WHO DETERMINE THE APPROPRIATE LEVEL OF SERVICE FOR THE PARTICULAR CHILD.

Q. AND YOU HAVE NOT COMMUNICATED TO THOSE CUA'S THAT DHS WILL BE CONSIDERING STILL MAKING PLACEMENTS WITH CATHOLIC IF THAT PLACEMENT IS IN THE BEST INTEREST OF THE CHILD IN WRITING, HAVE YOU?

A. WHAT WE HAVE COMMUNICATED --

Q. I AM NOT ASKING WHAT YOU HAVE --

A. YES, WE HAVE.

Q. WHAT HAVE YOU COMMUNICATED IN WRITING?

A. SO WE COMMUNICATED TO THE CUA'S AROUND, I BELIEVE, MARCH THE 26 OR MARCH THE 27 -- I CAN'T REMEMBER OFFHAND -- THAT WE DID NOT WANT TO SEE ANY PLACEMENT DISRUPTIONS OF YOUNG PEOPLE. AND THERE WAS SOME OTHER POINTERS, SOME OTHER -- SO WE DID.

Q. YOU COMMUNICATED TO THE CUA'S, WE ARE ASKING THAT YOU REFRAIN FROM MAKING ANY FOSTER CARE REFERRALS TO BETHANY CHRISTIAN SERVICES AND CATHOLIC SOCIAL SERVICES, RIGHT? THAT WAS IN YOUR COMMUNICATION TO THEM.

A. THAT WAS PART OF IT. SOME ADDITIONAL LANGUAGE.

Q. THAT WAS A QUOTE FROM YOUR COMMUNICATION TO THEM.

A. AND SOME ADDITIONAL LANGUAGE, YES.

Q. THE E-MAIL ALSO STATED: PLEASE FORWARD THIS E-MAIL TO YOUR STAFF, PARTICULARLY STAFF WITH THE RESPONSIBILITY TO IDENTIFY PLACEMENT, CORRECT?

A. YES.

Q. YOU DID NOT SAY ANYTHING IN THIS E-MAIL ABOUT ENSURING THAT ADDITIONAL PLACEMENTS WHERE GOING TO BE WITH CATHOLIC IF IT WOULD BE IN THE BEST INTEREST OF THE CHILD.

A. NO. BECAUSE THAT INFORMATION WAS COMMUNICATED TO CATHOLIC --

Q. BUT --

A. -- TO KEEP IT CENTRALIZED.

Q. -- YOU COMMUNICATED THAT TO OTHER CUA EXECUTIVE LEADERSHIP.

A. NO. AND WE WOULDN'T HAVE.

Q. AND YOU HAVE NOT COMMUNICATED THAT TO DHS STAFF IN WRITING, HAVE YOU?

A. NO.

Q. YOU HAVE NOT COMMUNICATED TO ANY STAFF IN THE CENTRAL REFERRAL UNITS THAT THEY CAN REFER CHILDREN TO CATHOLIC IF IT WOULD BE IN THEIR BEST INTEREST, HAVE YOU?

A. WHAT WAS COMMUNICATED TO THE --

Q. YOU HAVE NOT COMMUNICATED IN WRITING TO THE CENTRAL REFERRAL UNIT STAFF THAT THEY CAN MAKE REFERRALS TO CATHOLIC IF IT WOULD BE IN THE BEST INTEREST OF CHILDREN?

A. NO.

Q. AND YOU DIDN'T SAY ANYTHING IN THIS E-MAIL ABOUT ENSURING THAT CHILDREN WOULD BE PLACED WITH SIBLING GROUPS, DID YOU?

A. NO.

Q. YOU DIDN'T SAY ANYTHING IN THIS E-MAIL ABOUT ENSURING THAT CHILDREN COULD BE PLACED WITH FAMILIES WITH PREEXISTING RELATIONSHIPS?

A. NO.

Q. THIS E-MAIL -- AND THIS IS ECF 13, EXHIBIT 1, ATTACHED E, THIS WAS SENT OUT ON MARCH 27, CORRECT?

A. DO I HAVE IT HERE?

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR?

THE COURT: YES.

MS. BARCLAY: YOUR HONOR, I AM APPROACHING THE WITNESS WITH ECF 13-6. IT'S ATTACHMENT E. IT'S ALREADY BEEN ADMITTED.

THE COURT: WHAT IS YOUR QUESTION?

BY MS. BARCLAY:

Q. MS. ALI, YOU SENT THIS E-MAIL OUT ON MARCH 26, CORRECT?

A. YES.

Q. AND THIS E-MAIL WAS FORWARDED ON MARCH 27TH TO STAFF BY STACEY BOYD?

A. YES.

Q. AND STACEY BOYD REPORTS TO YOU, CORRECT?

A. YES, SHE DOES.

Q. AND SHE ALSO WORKS FOR DHS?

A. YES, SHE DOES.

Q. AND IN HER FOLLOW-UP E-MAIL, SHE SAID: GOOD AFTERNOON, EXECUTIVE LEADERSHIP. PLEASE SEE BELOW. THE INFORMATION MUST BE COMMUNICATED TO YOUR RESPECTIVE STAFF IN ORDER TO ENSURE THAT -- ALL CAPS -- NO REFERRALS ARE SENT TO THESE TWO PROVIDERS EFFECTIVE IMMEDIATELY.

DID I READ THAT RIGHT?

A. YES.

Q. SHE DID NOT SAY ANYTHING ABOUT ENSURING ADDITIONAL PLACEMENTS FOR THE BEST INTEREST OF THE CHILD.

A. NO.

Q. SHE DID NOT SAY ANYTHING ABOUT INSTRUCTING THE CHILDREN COULD BE PLACED WITH SIBLING GROUPS.

A. NO.

Q. SHE DID NOT SAY ANYTHING ABOUT INSTRUCTING THE CHILDREN COULD STILL BE PLACED WITH FAMILIES WITH A PREEXISTING RELATIONSHIP.

A. NO.

Q. NOW, THE EVENT THAT PRECIPITATED THIS E-MAIL IS THAT ON MARCH 24TH, CATHOLIC LET THE COMMISSIONER KNOW THAT THEY HAD ACCEPTED A REFERRAL FOR A CHILD.

A. I AM NOT SURE.

MS. OLIVER: OBJECTION. YOUR HONOR, CAN COUNSEL CLARIFY THAT QUESTION OR REPEAT THE QUESTION?

BY MS. BARCLAY:

Q. YOU WERE DISCUSSING THIS ISSUE WITH COMMISSIONER FIGUEROA BEFORE YOU SENT OUT YOUR E-MAIL ON MARCH 26, CORRECT?

THE COURT: DO YOU UNDERSTAND?

MS. OLIVER: OBJECTION AS TO THIS ISSUE. IT'S VAGUE, YOUR HONOR.

THE COURT: YES. GO BACK A COUPLE OF STEPS, PLEASE.

BY MS. BARCLAY:

Q. BEFORE YOU SENT OUT YOUR E-MAIL ON MARCH 26, DID YOU DISCUSS THAT E-MAIL WITH COMMISSIONER FIGUEROA?

THE COURT: THE ONE THAT SHE WAS GOING TO SEND OUT ON MARCH 26?

MS. BARCLAY: YES.

BY MS. BARCLAY:

Q. SO THE E-MAIL THAT YOU WERE GOING TO SEND OUT ON MARCH 26, DID YOU DISCUSS THAT WITH COMMISSIONER FIGUEROA?

A. YES.

Q. AND DID YOU UNDERSTAND THAT COMMISSIONER FIGUEROA HAD BEEN NOTIFIED THAT CATHOLIC SOCIAL SERVICES RECEIVED A REFERRAL FROM A CHILD ON MARCH 24?

MS. OLIVER: OBJECTION. YOUR HONOR, LACK OF FOUNDATION.

THE COURT: WELL, OVERRULED.

IF YOU KNOW.

THE WITNESS: CAN I TELL YOU WHAT -- I DON'T KNOW THE SPECIFICS IN TERMS OF A CHILD THAT WAS SPOKEN ABOUT. I DO KNOW THAT -- THE SITUATION I KNEW OF WAS ANOTHER PROVIDER AGENCY -- IF I CAN SAY THE AGENCY WAS BETHANY -- ACCEPTED, WAS GOING TO ACCEPT THE REFERRAL FROM ANOTHER FOSTER CARE AGENCY. AS I TESTIFIED, FOSTER CARE AGENCIES CANNOT REFER OUTSIDE OF THEIR PARTICULAR ORGANIZATION. THEREFORE, THIS E-MAIL WAS SENT OUT BECAUSE OF THAT.

BY MS. BARCLAY:

Q. I WANT TO TAKE YOU TO THE EVENING OF MAY 25, 2018. YOU COMMUNICATED WITH JIM BLACK REGARDING DOE

FOSTER CHILD PLACEMENT, CORRECT?

A. YES.

Q. AND YOU WEREN'T THERE, AT DHS --

MS. OLIVER: OBJECTION, YOUR HONOR. THIS LINE OF QUESTIONING IS BEYOND THE SCOPE OF DIRECT.

MS. BARCLAY: THIS LINE OF QUESTIONING IS RELEVANT TO THE ASSERTION BY DHS THAT WAS MADE ON DIRECT AS FAR AS THEIR ENSURING THAT PLACEMENTS WILL STILL BE MADE IN THE BEST INTEREST OF CHILDREN, AND THAT BEING A PRIORITY FOR THEM, YOUR HONOR.

THE COURT: I'M GOING TO SUSTAIN THE OBJECTION. BUT I'M ALSO GOING TO RECESS. UNTIL TOMORROW. AT 1 O'CLOCK.

MS. BARCLAY: THANK YOU, YOUR HONOR.

(ALL RISE.)

I N D E X.

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
TONI SIMMS-BUSCH	34	53	56	-
CECILIA PAUL	58	-	-	-
SHARONELL FULTON	64	70	-	-
KIMBERLY ALI	74	97	-	-

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

DATE **OFFICIAL COURT REPORTER**

LYNN MCCLOSKEY, RPR

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EXHIBIT 24

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA

\- - -

SHARONELL FULTON, ET AL	:	**CIVIL DOCKET FOR CASE**
	:	**NO. 18-2075**
-VS-	:	
	:	
CITY OF PHILADELPHIA, ET AL	:	

\- - -

PHILADELPHIA, PA.

JUNE 19, 2018

BEFORE HONORABLE JUDGE PETRESE B. TUCKER

TEMPORARY RESTRAINING ORDER

DAY 2

APPEARANCES:

FOR THE PLAINTIFF: **BECKET FUND FOR RELIGIOUS LIBERTY**
BY: LORI H. WINDHAM, ESQ.
MARK L. RIENZI, ESQ.
STEPHANIE H. BARCLAY, ESQ.
1200 NEW HAMPSHIRE AVE, N.W.
SUITE 700
WASHINGTON, DC 20036

FOR THE DEFENDANTS: **CITY OF PHILADELPHIA LAW DEPARTMENT**
BY: ELEANOR N. EWING, ESQ.
BENJAMIN H. FIELD, ESQ.
SCHAUNDRA OLIVER, ESQ.
1515 ARCH STREET, 16TH FLOOR
PHILADELPHIA, PA 19102

LYNN MCCLOSKEY, RPR
OFFICIAL COURT REPORTER
1234 US COURTHOUSE
601 MARKET STREET
PHILADELPHIA, PA 19106
(856) 649-4774

FOR THE DEFENDANTS: MARSHALL DENNEHEY WARNER COLEMAN & GOGGIN
BY: DIANA P. CORTES, ESQ.
2000 MARKET STREET, SUITE 2300
PHILADELPHIA, PA 19103

THE COURT: GOOD AFTERNOON.

ALL COUNSEL: GOOD AFTERNOON, YOUR HONOR.

THE COURT: YOU MAY BE SEATED.

CAN THE WITNESS TAKE THE STAND, MS. ALI.

(MS. ALI RETAKES THE STAND.)

THE COURT: OKAY. YOU MAY CONTINUE.

MS. BARCLAY: THANK YOU, YOUR HONOR.

CONTINUED CROSS EXAMINATION

BY MS. BARCLAY:

Q. MS. ALI, YOU REMEMBER THAT YOU GAVE TESTIMONY YESTERDAY?

A. YES.

Q. AND IS THERE ANY OF THAT TESTIMONY YOU WANT TO CHANGE AT THIS POINT?

A. NO.

Q. YOU STILL STAND BY YESTERDAY'S TESTIMONY?

A. YES.

Q. AND DO YOU UNDERSTAND THAT YOU ARE STILL UNDER OATH TODAY?

A. YES.

Q. YOU REPORT TO COMMISSIONER FIGUEROA, CORRECT?

A. YES.

Q. YESTERDAY WE DISCUSSED AN E-MAIL THAT YOU SENT ON MARCH 26TH.

A. YES.

Q. YOU CONSULTED WITH COMMISSIONER FIGUEROA BEFORE SEEING THAT E-MAIL, CORRECT?

A. YES.

Q. ON MARCH 24 CATHOLIC NOTIFIED DHS THAT IT HAD ACCEPTED A PLACEMENT TO REUNITE A CHILD WITH ITS SIBLING. YOU DISCUSSED THAT SITUATION WITH COMMISSIONER FIGUEROA, CORRECT?

A. I DISCUSSED FOUR CASES WITH COMMISSIONER FIGUEROA OVER THE COURSE. I DON'T KNOW SPECIFICALLY IN WHAT ORDER.

Q. I AM NOT ASKING WHICH ORDER. I JUST WANT TO KNOW, IS IT CORRECT THAT YOU DID DISCUSS THIS CASE WITH COMMISSIONER FIGUEROA?

A. CAN YOU CLARIFY WHAT "THIS CASE" IS.

Q. ON MARCH 24TH, CATHOLIC NOTIFIED DHS THAT IT HAD ACCEPTED A PLACEMENT, AND I CAN TELL YOU THE NAME OF THE CHILD, TO REUNITE THAT CHILD WITH ITS SIBLINGS. DO YOU RECALL DISCUSSING THAT SITUATION WITH COMMISSIONER FIGUEROA?

A. YES.

Q. DID YOU DISCUSS THAT ON MARCH 24TH?

A. I AM NOT SURE IF IT WAS ON MARCH THE 24TH.

Q. WOULD IT HAVE BEEN NEARLY THEREAFTER IF NOT ON MARCH 24TH?

A. YES.

Q. ONE THING YOU TOLD ME YESTERDAY WAS THAT THE REASON FOR YOUR MARCH 26 TO 27 E-MAIL TO CUA LEADERSHIP WAS A NEED TO REITERATE THE RULE THAT NO AGENCIES SHOULD BE MAKING REFERRALS, IS THAT CORRECT?

A. REFERRALS TO OUTSIDE AGENCIES, YES.

Q. YOUR E-MAIL ON MARCH 26 DOES NOT SAY THAT IN THOSE TERMS. CORRECT?

A. CAN YOU SHOW ME A COPY OF THE E-MAIL.

Q. ABSOLUTELY.

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

BY MS. BARCLAY:

Q. MS. ALI, I AM APPROACHING YOU WITH WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 3.

YOUR E-MAIL DOES NOT JUST REITERATE A GENERAL RULE THAT NO AGENCY SHOULD BE MAKING REFERRALS, DOES IT?

A. NO.

Q. YOUR E-MAIL TARGETS JUST TWO AGENCIES, DOESN'T IT?

MS. OLIVER: OBJECTION TO THE CHARACTERIZATION OF "TARGET."

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. YOUR AGENCY IS DISCUSSING JUST TWO AGENCIES. YOUR E-MAIL IS DISCUSSING JUST TWO AGENCIES, CORRECT?

A. TWO AGENCIES WITH AN INTAKE CLOSURE.

Q. SO IT'S CORRECT THAT YOUR E-MAIL IS JUST DISCUSSING TWO AGENCIES WITH AN INTAKE CLOSURE?

A. YES.

Q. IN FACT, THE SUBJECT LINE OF YOUR E-MAIL SAYS: INTAKE CLOSURE FOR BETHANY AND CATHOLIC SOCIAL SERVICES FOSTER-CARE PROGRAM, CORRECT?

A. YES.

Q. YOU DIDN'T SEND ANOTHER E-MAIL TELLING CUA'S NOT TO MAKE REFERRALS TO THE OTHER 28 AGENCIES, DID YOU?

A. I WOULD NOT HAVE DONE THAT.

Q. AND YOU DIDN'T DO THAT, RIGHT?

A. I WOULD NOT HAVE DONE THAT. BECAUSE CUA MAKES REFERRALS.

Q. RIGHT. AND I AM TRYING TO CONFIRM YOU DID NOT SEND ANOTHER E-MAIL REMINDING CUA NOT TO MAKE REFERRALS TO ANY OTHER AGENCY BECAUSE CUA MAKES REFERRALS. YOU DIDN'T SEND ANOTHER E-MAIL?

A. NO.

Q. YOU ASKED FOR CONFIRMATION THAT THE E-MAIL WAS SENT TO ANYONE WHO COULD, QUOTE, GENERATE, APPROVE OR SUBMIT A REFERRAL TO -- AND THEN CATHOLIC OR BETHANY ARE

THE TWO AGENCIES YOU ARE REFERRING TO, CORRECT?

A. MY E-MAIL DOES NOT SAY THAT.

Q. I APOLOGIZE. THAT'S THE E-MAIL OF MS. STACY BOYD WHO REPORTS TO YOU, CORRECT? AND HER E-MAIL SAYS: PROVIDE CONFIRMATION THAT THE E-MAIL WOULD BE SENT TO ANYONE WHO WOULD, QUOTE, GENERATE, APPROVE OR SUBMIT A REFERRAL TO CATHOLIC OR BETHANY, CORRECT?

A. YES.

Q. AND HER E-MAIL DOES NOT ASK ABOUT THAT SORT OF CONFIRMATION FOR THE OTHER 28 AGENCIES, DOES IT?

A. SHE DIDN'T SEND THE E-MAIL TO THE OTHER 28 AGENCIES. HER E-MAIL JUST WENT TO CUA LEADERSHIP.

Q. BUT MY QUESTION IS WHEN SHE IS SAYING, PLEASE REPLY SEPARATELY TO ME CONFIRMING THAT YOU HAVE SHARED THIS INFORMATION TO THOSE THAT COULD POTENTIALLY GENERATE, APPROVE OR SUBMIT A REFERRAL TO THESE PROVIDERS, SHE IS REFERRING TO BETHANY AND CATHOLIC, CORRECT?

MS. OLIVER: OBJECTION, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: REPEAT THE QUESTION. I AM NOT SURE IF I UNDERSTAND IT.

BY MS. BARCLAY:

Q. LET ME READ YOU THE SENTENCE IN HER E-MAIL.

A. YES.

Q. SHE SAYS: PLEASE REPLY SEPARATELY TO ME CONFIRMING THAT YOU HAVE SHARED THIS INFORMATION TO THOSE THAT COULD POTENTIALLY GENERATE, APPROVE OR SUBMIT A REFERRAL TO THESE PROVIDERS. AND I JUST WANT TO CONFIRM THAT WHEN SHE SAYS "THESE PROVIDERS," SHE IS REFERRING TO CATHOLIC AND BETHANY, CORRECT?

A. YES.

Q. AND SHE DID NOT SEND AN E-MAIL OR SAY IN THIS E-MAIL THAT SHE NEEDED THAT SORT OF CONFIRMATION FOR REFERRAL TO ANY OF THE OTHER 28 AGENCIES, DID SHE?

A. NO. THAT'S WHEN THE OTHER AGENCIES ARE OPEN, THEIR INTAKE WAS NOT CLOSED.

Q. THANK YOU.

I WANT TO TAKE YOU TO THE EVENING OF MAY 25. YOU RECEIVED TEXTS FROM JIM BLACK REGARDING DOE FOSTER CHILD NUMBER 1.

A. CORRECT.

Q. AND YOU AND MR. BLACK COMMUNICATED ABOUT THIS SITUATION?

A. VIA TEXT AS WELL AS TELEPHONE.

Q. BEYOND YOUR COMMUNICATION WITH MR. BLACK, DID YOU RECEIVE ANY OTHER COMMUNICATION THAT EVENING ABOUT DOE FOSTER CHILD?

A. YOU SAID BESIDES MR. BLACK?

Q. BESIDES MR. BLACK?

A. NO.
Q. SO YOUR DHS STAFF NEVER CALLED YOU THAT NIGHT REGARDING DOE FOSTER CHILD'S PLACEMENT, DID THEY?
A. NO.
Q. AND YOU DIDN'T KNOW WHY STAFF DENIED THE PLACEMENT WITH DOE FOSTER CHILD -- YOU DIDN'T THAT NIGHT --
MS. OLIVER: OBJECTION, YOUR HONOR, BEYOND THE SCOPE OF DIRECT.
THE COURT: OVERRULED.
THE WITNESS: REPEAT THE QUESTION. I'M SORRY.
BY MS. BARCLAY:
Q. YOU DON'T KNOW WHY YOUR STAFF DENIED THE PLACEMENT WITH DOE FOSTER CHILD'S FORMER FOSTER MOTHER.
A. I DON'T BECAUSE I HAVE NOT HAD A CONVERSATION WITH THE STAFF.
Q. IT'S POSSIBLE THAT DHS STAFF DENIED THIS REFERRAL SOLELY BECAUSE OF THE ONGOING CASE AND REFERRAL FOR USE WITH CATHOLIC, ISN'T IT?
MS. OLIVER: OBJECTION, CALLS FOR SPECULATION.
THE COURT: SUSTAINED.
BY MS. BARCLAY:
Q. IF DHS STAFF HAD DENIED THIS REFERRAL SOLELY

BECAUSE OF THE ONGOING CASE AND REFERRAL FOR USE WITH CATHOLIC, WHAT WOULD BE YOUR POSITION ON THAT DENIAL BY DHS STAFF?

MS. OLIVER: OBJECTION, CALLS FOR SPECULATION.

THE COURT: SUSTAINED.

MS. BARCLAY: YOUR HONOR, I AM NOT ASKING IF SHE KNOWS WHAT HER STAFF DID. I'M ASKING WHAT HER POSITION WOULD BE ON THE DENIAL IF THAT WAS THE CIRCUMSTANCES OF THE DENIAL.

THE COURT: THAT IS SPECULATIVE, SO I AM GOING TO SUSTAIN THE OBJECTION.

BY MS. BARCLAY:

Q. DHS STAFF DID NOT COMMUNICATE TO YOU THAT NIGHT THAT DOE FOSTER MOTHER WAS WILLING TO ADOPT DOE FOSTER CHILD, DID THEY?

A. NO.

Q. IN FACT, YOUR PREVIOUS TESTIMONY IS THAT YOU LEARNED THROUGH LITIGATION THAT THIS FOSTER MOTHER WAS WILLING TO ADOPT?

A. THAT IS CORRECT.

Q. IF THIS SITUATION WERE NOT BROUGHT TO YOUR ATTENTION BY CATHOLIC, YOU MAY HAVE NEVER LEARNED ABOUT IT?

MS. OLIVER: OBJECTION.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. YOU HAVE NOT ASKED CUA TO REPORT TO YOU ABOUT SIMILAR SITUATIONS, HAVE YOU?

MS. OLIVER: OBJECTION.

THE COURT: THAT HAS BEEN ASKED AND ANSWERED. SUSTAINED.

BY MS. BARCLAY:

Q. YOU HAVE NOT ASKED YOUR OWN DHS STAFF TO REPORT TO YOU ABOUT THIS SORT OF SITUATION IN THE FUTURE, HAVE YOU?

THE COURT: WHAT SORT OF SITUATION?

MS. BARCLAY: THE DOE FOSTER CHILD SITUATION WHERE THE DOE FOSTER MOTHER WAS WILLING TO ADOPT THE CHILD.

THE WITNESS: I AM NOT SURE WHAT THE QUESTION IS. I'M SORRY, REPEAT IT AGAIN.

BY MS. BARCLAY:

Q. SINCE MAY 25, YOU HAVE NOT COMMUNICATED IN WRITING TO DHS STAFF THAT THEY SHOULD NOTIFY YOU IF THERE IS A POTENTIAL REFERRAL WITH A CHILD TO CATHOLIC WHERE THAT CHILD WOULD BE REUNITED WITH A FAMILY WITH A FORMER RELATIONSHIP?

A. NO.

Q. BUT THERE HAS BEEN SOME CONFUSION ON THE GROUND FROM LOWER LEVEL DHS WORKERS ABOUT WHEN REFERRALS TO

CATHOLIC ARE ALLOWED, ISN'T IT?

MS. OLIVER: OBJECTION.

THE COURT: SUSTAINED.

MS. BARCLAY: YOUR HONOR, THIS IS A STATEMENT IN THE BRIEF BY MS. ALI'S ATTORNEYS, SO I AM NOT SURE WHAT THE OBJECTION IS. BUT I AM QUOTING FROM THEIR BRIEF.

THE COURT: I AM NOT SURE WHAT THE RELEVANCE IS SO I AM GOING TO SUSTAIN THE OBJECTION.

MS. BARCLAY: MAY I EXPLAIN THE RELEVANCE OF THIS STATEMENT, YOUR HONOR?

THE COURT: NO. LET'S MOVE ON.

BY MS. BARCLAY:

Q. YOU HAVE BEEN DOING FOSTER-CARE WORK FOR ABOUT 18 YEARS?

A. YES.

Q. WHAT MOTIVATED YOU TO DO THIS TYPE OF WORK?

A. MINISTRY.

Q. WHAT DO YOU MEAN BY "MINISTRY"?

A. WHAT I MEAN BY MINISTRY IS WHEN I WORK AS AN SOCIAL WORKER IS -- I BELIEVE IS A CALLING SO I DO IT BECAUSE OF MINISTRY AND I ALSO DO IT BECAUSE OF MY EDUCATIONAL BACKGROUND TO HELP PEOPLE.

Q. WELL, FIRST, LET ME SAY THANK YOU FOR YOUR MINISTRY AND YOUR SERVICE TO THESE CHILDREN AND I DO THINK THAT IS VERY ADMIRABLE. IS IT SAFE TO SAY YOU ARE

NOT IN THIS LINE OF WORK FOR THE MONEY?

A. ABSOLUTELY. YES, IT IS SAFE TO SAY THAT.

Q. I THOUGHT THAT MIGHT BE A FAIR ASSUMPTION.

SO YOU DON'T THINK OF FOSTER-CARE WORK AS A BUSINESS, DO YOU?

MS. OLIVER: OBJECTION.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. DO YOU CONSIDER FOSTER-CARE TO BE SOMETHING THAT IS OFFERED AS A BUSINESS?

MS. OLIVER: OBJECTION.

MS. BARCLAY: I AM STILL NOT SURE WHAT THE OBJECTION IS, YOUR HONOR.

THE COURT: I AM GOING TO SUSTAIN THE OBJECTION.

BY MS. BARCLAY:

Q. DO YOU THINK FOSTER-CARE AGENCIES ARE BUSINESSES?

MS. OLIVER: OBJECTION, RELEVANCE, YOUR HONOR.

MS. BARCLAY: THE RELEVANCE IS, YOUR HONOR, THAT IN OPENING ARGUMENT THAT MS. ALI'S ATTORNEY SPENT SOME OF HIS TIME DESCRIBING FOSTER-CARE AGENCIES AS BUSINESSES, AND I WANT TO UNDERSTAND IF THAT IS A POSITION THAT MS. ALI ALSO TAKES. THIS IS AN ISSUE THAT THE ATTORNEYS FOR MS. ALI

HAVE MADE RELEVANT IN THIS LITIGATION.

MS. OLIVER: YOUR HONOR, I OBJECT ON THE GROUNDS THAT THAT'S A LEGAL ISSUE.

MS. BARCLAY: WHETHER OR NOT A FOSTER-CARE BUSINESS -- A FOSTER CASE AGENCY IS A BUSINESS IS NOT A LEGAL ISSUE. THAT'S A FACTUAL QUESTION.

THE COURT: BUT I DON'T KNOW WHETHER SHE IS IN A POSITION TO ANSWER THAT. ANYTHING SHE WOULD SAY WOULD BE HER OPINION, AND THAT'S NOT RELEVANT TO THESE PROCEEDINGS.

BY MS. BARCLAY:

Q. HAVE YOU EVER PERSONALLY REFERRED TO FOSTER-CARE AGENCIES AS BUSINESSES?

A. NO.

Q. YOU KNOW THAT CATHOLIC IS A NONPROFIT ORGANIZATION, RIGHT?

A. YES.

Q. ARE YOU AWARE THAT CATHOLIC ACTUALLY LOSES MONEY PROVIDING FOSTER-CARE SERVICES?

MS. OLIVER: OBJECTION.

THE COURT: OVERRULED, IF SHE IS AWARE.

THE WITNESS: I DON'T KNOW.

BY MS. BARCLAY:

Q. ARE YOU AWARE THAT CATHOLIC PROVIDES THESE SERVICES AS PART OF THEIR RELIGIOUS MISSION?

A. I AM NOT SURE.

Q. SO YOU SAID YOU HAVE NEVER REFERRED TO -- PERSONALLY REFERRED TO FOSTER-CARE AS A BUSINESS. I JUST WANT TO CONFIRM, YOU HAVE ALSO NEVER REFERRED TO CATHOLIC SOCIAL SERVICES AS A BUSINESS, HAVE YOU?

MS. OLIVER: OBJECTION.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. YOU ARE FAMILIAR WITH POLICIES AND PROCEDURES GOVERNING FOSTER-CARE, CORRECT?

A. YES.

Q. AND YOU'RE FAMILIAR WITH POLICIES AND LEGAL REQUIREMENTS THAT AGENCIES HAVE TO COMPLY WITH IN ORDER TO BE A PROVIDER IN PHILADELPHIA?

A. I AM FAMILIAR WITH POLICIES AND REGULATIONS. I WOULD NOT SAY THAT I AM FAMILIAR WITH ALL OF THE LEGAL.

Q. IS IT YOUR POSITION -- WHAT WAS THE BASIS FOR THE REFERRAL FREEZE TO CATHOLIC SOCIAL SERVICES?

A. SO THE BASIS OF THE REFERRAL FREEZE OR THE INTAKE CLOSURE TO CATHOLIC COMMUNITY SERVICES IS BECAUSE CATHOLIC COMMUNITY SERVICES REFUSED TO CERTIFY FOSTER PARENTS OR PROVIDE AN ADOPTION HOME STUDY FOR FOSTER PARENTS WHO WERE IN A SAME-SEX UNION.

Q. AND WHAT WAS THE EXPLANATION FOR THE DHS POLICY THAT THAT VIOLATED WHEN YOU COMMUNICATED THAT REFERRAL

FOR USE TO CATHOLIC?
A. ACCORDING TO OUR ATTORNEYS, IT WAS FAIR PRACTICE.
Q. THE FAIR PRACTICE ORDINANCE, MEANING WHAT?
A. I DON'T KNOW ALL THE DETAILS.
Q. DO YOU THINK FOSTER-CARE IS A PUBLIC ACCOMMODATION?
A. I CAN'T ANSWER THAT QUESTION.
MS. OLIVER: OBJECTION.
THE COURT: SHE SAID SHE CAN'T ANSWER IT.
BY MS. BARCLAY:
Q. YESTERDAY I THINK I UNDERSTOOD YOUR TESTIMONY TO BE, AND CORRECT ME IF I'M NOT GETTING THIS RIGHT, THAT I THINK I UNDERSTOOD YOUR TESTIMONY TO BE THAT IF A QUALIFIED FOSTER FAMILY WANTED TO RECEIVE A HOME STUDY FROM A PARTICULAR AGENCY, THEN THAT AGENCY WOULD HAVE TO PROVIDE THE HOME STUDY?
A. I'M SORRY. REPEAT IT AGAIN.
Q. YESTERDAY I UNDERSTOOD YOUR TESTIMONY TO BE THAT UNDER DHS POLICY IF A QUALIFIED FOSTER FAMILY WANTED TO RECEIVE A HOME STUDY FROM A FOSTER AGENCY, THEN THAT PARTICULAR FOSTER AGENCY WOULD HAVE TO PROVIDE IT. THEY COULD NOT TURN THAT FAMILY AWAY?
A. UNLESS IT WAS THE FAMILY'S CHOICE, YES.
Q. SO PRESUMABLY THIS IS AN IMPORTANT POLICY FOR

DHS?

A. YES.

Q. AND THIS IS A POLICY THAT YOU HAVE A COMPELLING INTEREST IN ENFORCING, CORRECT?

THE COURT: WHAT DO YOU MEAN BY "COMPELLING"?

BY MS. BARCLAY:

Q. THIS IS A POLICY THAT YOU HAVE A STRONG INTEREST IN ENFORCING, CORRECT?

A. I WOULD SAY INTEREST IN ENFORCING.

Q. YOU HAVE AN INTEREST IN ENFORCING THIS POLICY.

A. YES.

Q. NOT A STRONG INTEREST?

A. I HAVE AN INTEREST IN ENFORCING ALL POLICY. WHETHER IT'S STRONG OR WEAK, I CANNOT SAY THAT.

Q. OKAY. SO YOU HAVE AN INTEREST THAT IS NO STRONGER OR NO WEAKER THAN ENFORCING ANY OTHER POLICY?

A. YES.

Q. AND WHEN DID YOU FIRST PUT THIS PARTICULAR POLICY IN WRITING?

A. WHAT PARTICULAR POLICY?

MS. OLIVER: OBJECTION.

MS. BARCLAY: I AM NOT SURE WHAT THE OBJECTION IS, YOUR HONOR.

THE COURT: I WAS GOING TO READY TO ASK YOU WHAT POLICY.

MS. BARCLAY: THE POLICY I JUST DESCRIBED TO HER FROM YESTERDAY'S TESTIMONY THAT SHE AGREED TO, WHICH IS THAT IF A QUALIFIED FOSTER FAMILY WANTED TO RECEIVE A HOME STUDY FROM A PARTICULAR AGENCY AND THAT WAS THE FAMILY'S CHOICE, THEN THAT AGENCY WOULD NEED TO PROVIDE THAT HOME STUDY.

BY MS. BARCLAY:

Q. I AM TRYING TO UNDERSTAND, MS. ALI, WHEN DID YOU FIRST PUT THAT POLICY IN WRITING?

MS. OLIVER: OBJECTION, YOUR HONOR. ASSUMING FACTS NOT IN EVIDENCE.

MS. BARCLAY: I AM JUST BASING ON HER OWN TESTIMONY, YOUR HONOR, THAT IS IN EVIDENCE.

THE COURT: WHEN YOU SAY "IN WRITING," I DON'T KNOW THAT IT'S BEEN PLACED IN WRITING.

BY MS. BARCLAY:

Q. OKAY. HAVE YOU EVER PUT THIS POLICY IN WRITING?

A. IT IS MY UNDERSTANDING OF THE CONTRACT, SO ME PERSONALLY, NO, I DON'T PUT CONTRACTS IN WRITING OR POLICIES IN WRITING. THOSE ARE DONE BY A SEPARATE DEPARTMENT.

Q. GREAT. SO YOUR UNDERSTANDING IS THAT THIS POLICY -- THE PLACE WHERE IT IS WRITTEN DOWN EXCLUSIVELY COMES FROM THE FOSTER-CARE CONTRACT?

THE COURT: EXCLUSIVELY? SHE DIDN'T SAY

THAT.

MS. BARCLAY: I AM JUST CONFIRMING IF THAT IS TRUE.

THE WITNESS: I WAS GOING TO SAY THE SAME THING, AS EXCLUSIVELY.

THE COURT: YES.

BY MS. BARCLAY:

Q. IS THERE ANOTHER SPOT YOU'RE AWARE, OTHER THAN THE CONTRACT, WHERE THIS POLICY IS WRITTEN DOWN?

A. I AM NOT SURE.

Q. SO YOU ARE NOT AWARE, RIGHT, AT THIS TIME OF ANOTHER SPOT WHERE IT IS WRITTEN DOWN?

MS. OLIVER: OBJECTION, ASKED AND ANSWERED. THE WITNESS IS NOT SURE.

THE COURT: OVERRULED. SHE CAN ANSWER.

THE WITNESS: I SAID I AM NOT SURE.

BY MS. BARCLAY:

Q. THANK YOU. AND I AM JUST TRYING TO CLARIFY AT THIS TIME YOU ARE NOT AWARE OF ANYWHERE ELSE WHERE THIS POLICY IS WRITTEN DOWN. THAT'S JUST A YES OR NO QUESTION.

THE COURT: SHE IS NOT SURE.

MS. BARCLAY: OKAY.

BY MS. BARCLAY:

Q. HOW HAVE YOU COMMUNICATED THIS PARTICULAR POLICY

TO FOSTER AGENCIES?

A. I HAVE NOT. IT'S IN THE CONTRACT.

Q. OKAY. SO THE CONTRACT IS THE MAIN WAY IN WHICH YOU COMMUNICATE THIS WITH THE AGENCIES?

A. YES.

Q. AND HOW DO YOU COMMUNICATE TO FOSTER AGENCIES, IF AT ALL, WHETHER OR NOT THEY ARE REQUIRED TO COMPLY WITH PUBLIC ACCOMMODATION REQUIREMENTS?

A. I HAVE NOT.

Q. OKAY. YOU HAVE BEEN DOING THIS WORK FOR 18 YEARS?

A. YES.

Q. HAVE YOU EVER HAD CONVERSATIONS WITH ANYONE ABOUT DHS'S OWN OBLIGATIONS FOR PROVIDING A PUBLIC ACCOMMODATION REGARDING FOSTER-CARE SERVICES UNDER THE FAIR PRACTICES ORDINANCE?

MS. OLIVER: OBJECTION.

THE COURT: OVERRULED.

THE WITNESS: REPEAT IT, PLEASE.

BY MS. BARCLAY:

Q. HAVE YOU EVER HAD CONVERSATIONS WITH ANYONE ABOUT DHS'S OWN OBLIGATIONS PROVIDING A PUBLIC ACCOMMODATION WITH RESPECT TO FOSTER-CARE SERVICES UNDER THE FAIR PRACTICES ORDINANCE?

A. OTHER THAN IN THIS SITUATION?

Q. YES, OTHER THAN IN THIS SITUATION.

A. NO.

Q. AND IN THIS SITUATION, HAVE YOU HAD CONVERSATIONS ABOUT YOUR OWN REQUIREMENTS AND DHS'S OWN OBLIGATIONS TO PROVIDE PUBLIC ACCOMMODATION SERVICES WITH RESPECT TO FOSTER-CARE?

A. NO.

Q. HAVE YOU -- SO YOU HAVE NEVER TRAINED STAFF ABOUT THAT ISSUE EITHER?

A. NO.

Q. THANK YOU.

YOU STATE IN YOUR DECLARATION THAT A SITUATION IN WHICH A FOSTER AGENCY SHUT DOWN -- OR EXCUSE ME.

YOU DESCRIBED IN YOUR DECLARATION A SITUATION IN WHICH A FOSTER AGENCY SHUT DOWN AND THE CHILDREN NEEDED TO BE TRANSFERRED, CORRECT?

A. YES.

Q. YOU STATED THAT, QUOTE, THE GOAL IS TO KEEP CHILDREN IN THE SAME HOME AND NOT DISRUPT THE CHILDREN AND THEIR CARE, END QUOTE. CORRECT?

A. YES.

Q. AND THAT WAS THE GOAL BECAUSE MOVING CHILDREN FROM ONE HOME TO ANOTHER CAN BE TRAUMATIC?

A. ABSOLUTELY.

Q. AND IN GENERAL, MOVING CHILDREN BETWEEN ANY SORTS OF PLACEMENTS CAN COMPOUND THEIR TRAUMA?

A. IT DEPENDS.

Q. IS IT A POSSIBILITY THAT MOVING CHILDREN BETWEEN PLACEMENTS COMPOUNDS THEIR TRAUMA?

A. IT'S A POSSIBILITY.

Q. IN YOUR EXPERIENCE AND YOUR YEARS OF DOING IT, IS IT A LIKELY POSSIBILITY THAT CHILDREN WILL EXPERIENCE TRAUMA FROM MOVING FROM ONE PLACEMENT TO ANOTHER AND LOSING THE FAMILIARITY OF THE PAST PLACEMENT?

A. NOT NECESSARILY. DEPENDS ON THE SITUATION.

Q. YOUR GOAL WAS TO KEEP CHILDREN IN THEIR SAME HOME SO THAT THEY COULD AVOID THAT SORT OF DISRUPTION, CORRECT?

A. IN THAT PARTICULAR SITUATION WHEN -- THE FOSTER-CARE SITUATION YOU ARE TALKING ABOUT?

Q. YES.

A. YES.

Q. AND YOU WERE TREATING IT AS IN THE BEST INTEREST OF CHILDREN IN THAT SITUATION TO BE ABLE TO STAY WITH THEIR SAME FOSTER PARENT?

A. YES.

Q. IF CATHOLIC WERE FORCED TO SHUT ITS PROGRAM DOWN, YOU AGREE THAT CHILDREN AND FAMILIES WOULD NEED TO BE TRANSITIONED TO ANOTHER AGENCY?

A. IT DEPENDS ON THE INDIVIDUAL CHILD.
Q. BUT IF CATHOLIC IS SHUT DOWN, THEN THE FAMILIES AND CHILDREN THAT WERE PREVIOUSLY UNDER CATHOLIC'S CARE HAVE TO BE MOVED TO THE CARE OF ANOTHER AGENCY, RIGHT?
A. NOT NECESSARILY, BECAUSE WE WILL LOOK AT WHETHER OR NOT ANY OF THOSE CHILDREN OR YOUTH THAT ARE PLACED IN THE CATHOLIC COMMUNITY -- CATHOLIC SOCIAL SERVICES, EXCUSE ME, FOSTER HOME IF THEY ARE ABOUT TO ACHIEVE PERMANENCY. SO IF THOSE YOUNG PEOPLE WERE GOING TO EITHER BE REUNIFIED WITH THEIR FAMILY, IF THEY WERE GOING TO BE ADOPTED, OR IF THEY WERE GOING TO ACHIEVE PERMANENTLY THE CUSTODIANSHIP, THEN WE WOULD NOT WANT THE FOSTER PARENT TO REMAIN -- AND THE CHILD TO REMAIN WITH CATHOLIC COMMUNITY SERVICES. SO IT DEPENDS ON THE -- AND WE WOULD LOOK AT EACH CHILD AND YOUTH INDIVIDUALLY.
Q. SO SOME CHILDREN ARE GOING TO BE TO ABLE TO ACHIEVE PERMANENCY OR MAYBE BE REUNITED, AND SO WOULD NOT NEED TO BE A FOSTER CHILD ANY MORE. IS THAT RIGHT?
A. YES.
Q. FOR THE CHILDREN THAT NEEDED TO REMAIN FOSTER CHILDREN BECAUSE THEY COULD NOT ACHIEVE THOSE GOALS, IS IT CORRECT THAT THEY WOULD NEED TO BE TRANSITIONED TO ANOTHER AGENCY?
A. YES.

Q. IF SOME PARENTS DID NOT CHOOSE TO TRANSITION TO THE OTHER AGENCY, THEN THOSE CHILDREN WOULD HAVE TO BE REMOVED FROM THAT FAMILY, CORRECT?

A. YES.

Q. AND THAT COULD POSSIBLY CAUSE TRAUMA FOR THOSE CHILDREN, CORRECT?

A. YES.

MS. BARCLAY: NO FURTHER QUESTIONS, YOUR HONOR.

THE COURT: OKAY. ANY REDIRECT?

MS. OLIVER: YES, YOUR HONOR.

GOOD AFTERNOON, YOUR HONOR.

THE COURT: GOOD AFTERNOON.

REDIRECT EXAMINATION

BY MS. OLIVER:

Q. MS. ALI, LET'S START WITH -- YOU PROVIDED TESTIMONY ABOUT THE INTAKE CLOSURE AT CATHOLIC SOCIAL SERVICES, AND YOU ALSO SAID THAT THERE WERE SOME EXCEPTIONS, CORRECT?

A. YES.

Q. WILL YOU PLEASE INFORM THE COURT AS TO WHAT TYPES OF EXCEPTIONS THERE ARE?

A. SO THE EXCEPTIONS THAT WE WILL MAKE IS THAT WE WILL DETERMINE WHETHER OR NOT THAT CHILD HAD SIBLINGS THAT WERE PLACED IN A PARTICULAR FOSTER HOME THROUGH

CATHOLIC COMMUNITY SERVICES AND WHETHER OR NOT THEIR FOSTER PARENT WOULD BE WILLING TO ALLOW THE SIBLINGS TO BE REUNITED IN THEIR FOSTER HOME. WE ALSO MAKE EXCEPTIONS WHEN A CHILD OR YOUTH WAS PREVIOUSLY PLACED IN A CATHOLIC COMMUNITY SERVICES FOSTER HOME, WE WOULD WANT TO ASK THAT FOSTER PARENT WOULD THEY BE WILLING TO RESUME AND ALLOW THE CHILD TO RETURN BACK TO THEIR HOME FOR FOSTER-CARE.

Q. AND HOW WOULD THOSE EXCEPTIONS BECOME KNOWN?

A. THE EXCEPTIONS WOULD BECOME KNOWN TO MYSELF OR COMMISSIONER FIGUEROA BY WAY OF THE CUA LEADERSHIP. THEY WOULD EITHER SEND AN E-MAIL, A TELEPHONE CALL, OR EVEN A TEXT MESSAGE TO MYSELF OR COMMISSIONER FIGUEROA.

Q. AND SINCE THE INTAKE CLOSURE, HAS DHS IN FACT, EITHER YOU OR THE COMMISSIONER, RECEIVED REQUESTS FROM CATHOLIC SOCIAL SERVICES LEADERSHIP WITH RESPECT TO EXCEPTIONS?

A. YES.

Q. AND HAVE ANY OF THOSE EXCEPTIONS BEEN GRANTED?

A. ALL OF THEM.

Q. AND HOW MANY HAVE THERE BEEN?

A. A TOTAL OF FOUR.

Q. AND IN ADDITION TO THE EXCEPTIONS COMING TO YOUR KNOWLEDGE BY WAY OF CATHOLIC LEADERSHIP, WOULD -- IS THERE -- ARE THERE ANY INSTANCES WHERE DHS WOULD KNOW OF

SUCH EXCEPTIONS?

A. THERE ARE INSTANCES IN WHICH DHS WOULD KNOW OF EXCEPTIONS.

Q. AND ARE YOU ABLE TO PROVIDE -- EXPLAIN TO THE COURT HOW DHS WOULD KNOW?

A. IF THE INFORMATION WAS BROUGHT TO DHS BY WAY OF A CUA CASE MANAGER OR A DHS SOCIAL WORKER, THEN THE DHS SOCIAL WORKER WOULD ASK OR TRY TO DETERMINE WHETHER OR NOT THEY CAN GET AN EXCEPTION TO THE RULE.

Q. AND AGAIN THE EXCEPTION IS PRESENTED TO YOU?

A. YES.

Q. ADDITIONALLY, TURNING YOUR ATTENTION TO FOSTER -- PROSPECTIVE FOSTER PARENTS AND THEIR DESIRE TO WORK WITH PARTICULAR AGENCIES. FIRST OF ALL, CAN FOSTER-CARE AGENCIES -- DO YOU BELIEVE IT'S APPROPRIATE FOR FOSTER-CARE AGENCIES TO INFORM PROSPECTIVE FOSTER PARENTS ABOUT THE SERVICES THAT MAY BE OFFERED BY OTHER FOSTER-CARE AGENCIES?

A. ONLY AT THE REQUEST OF THE FOSTER PARENT, THE POTENTIAL FOSTER PARENT.

Q. AND DO YOU BELIEVE THAT -- I BELIEVE YOU HAVE ALREADY TESTIFIED THAT FOSTER PARENTS -- IT'S THEIR CHOICE TO CHOOSE WHICH AGENCY WITH WHICH THEY WOULD LIKE TO WORK?

A. YES.

Q. DO YOU ALSO BELIEVE IT'S APPROPRIATE FOR A FOSTER-CARE AGENCY TO REFUSE TO EVALUATE A FAMILY?

A. NO.

MS. OLIVER: YOUR HONOR, I HAVE NO FURTHER QUESTIONS OF MS. ALI.

THE COURT: ALL RIGHT. ANY OTHER QUESTIONS?

MS. BARCLAY: YES, YOUR HONOR, BUT I WILL BE BRIEF.

RECROSS EXAMINATION

BY MS. BARCLAY:

Q. YOU JUST SPOKE ABOUT EXCEPTIONS TO THE REFERRAL FREEZE, AND I BELIEVE YOU SAID FOR REUNITING SIBLINGS OR FOR FAMILIES WITH PREEXISTING RELATIONSHIPS. DID I GET THAT RIGHT?

A. YES.

Q. ANY OTHER BASIS FOR AN EXCEPTION?

A. IT COULD BE. I CAN'T THINK OF ANY OFFHAND.

Q. SURE.

A. THE MOST IMPORTANT THING WE WOULD DO IS -- I WOULD DO IS HAVE A CONVERSATION WITH THE CUA LEADERSHIP TO DETERMINE WHY AN EXCEPTION SHOULD BE GRANTED.

Q. WHEN WAS THE FIRST TIME YOU COMMUNICATED THIS POLICY OF GRANTING EXCEPTIONS?

A. I DIDN'T COMMUNICATE THIS. COMMISSIONER FIGUEROA COMMUNICATED THAT TO CATHOLIC COMMUNITY

SERVICES -- CATHOLIC SOCIAL SERVICES.

Q. WHEN IS YOUR UNDERSTANDING THAT THAT WAS COMMUNICATED?

A. AROUND THE TIME THE INTAKE WAS CLOSED.

Q. WHEN INTAKE WAS CLOSED, THAT'S YOUR UNDERSTANDING?

A. ON OR ABOUT.

Q. AND WHEN WAS THAT POLICY GRANTING EXCEPTIONS COMMUNICATED -- WELL, LET ME BACK UP A LITTLE BIT. YOU SAID THAT ONE OF THE WAYS THAT THESE SITUATIONS WILL BECOME KNOWN TO YOU IS THROUGH CUA LEADERSHIP?

A. YES.

Q. AND IT'S POSSIBLE THAT IF CUA LEADERSHIP DOES NOT NOTIFY YOU, YOU WON'T KNOW ABOUT THE NEED TO GRANT AN EXCEPTION?

A. THAT'S POSSIBLE.

Q. AND YOU HAVE NOT REQUESTED CUA LEADERSHIP TO BRING ANY OF THESE SITUATIONS TO YOUR ATTENTION, HAVE YOU?

A. I HAVE.

Q. HAVE YOU REQUESTED IN WRITING THAT ALL CUA LEADERSHIP BRING TO YOUR ATTENTION SITUATIONS WHERE A REFERRAL MAY NEED TO BE MADE TO CATHOLIC TO REUNITE SIBLINGS OR FAMILIES WITH PREEXISTING RELATIONSHIP?

A. I HAVE NOT TO ALL CUA LEADERSHIP. HOWEVER, IN

CONVERSATIONS WITH JIM AMATO AND JIM BLACK, I ALWAYS SAY IF THERE IS ANY ADDITIONAL, IF THERE IS ANY OTHER CASES THAT I NEED TO CONSIDER, JUST LET ME KNOW.

Q. BUT YOU HAVE NOT COMMUNICATED THIS TO LEADERS OF OTHER CUA'S, HAVE YOU?

MS. OLIVER: OBJECTION.

THE COURT: SUSTAINED.

MS. BARCLAY: YOUR HONOR, MAY I UNDERSTAND THE BASIS FOR THE OBJECTION?

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. YOU SAID THAT THERE HYPOTHETICALLY COULD BE INSTANCES WHERE DHS STAFF WOULD BRING THESE SORTS OF SITUATIONS TO YOUR ATTENTION?

A. IT COULD BE.

Q. BUT THAT'S NEVER ACTUALLY HAPPENED SO FAR, HAS IT?

A. NOT FOR CATHOLIC, BUT FOR OTHER SITUATIONS, YES.

Q. SINCE THIS LITIGATION HAS STARTED, DHS HAS NOT BROUGHT TO YOUR ATTENTION ANY NEEDS FOR AN EXCEPTION BASED ON THIS POLICY YOU DESCRIBED, CORRECT?

A. YES, THEY HAVE.

Q. IN WHAT INSTANCES HAVE DHS STAFF BROUGHT TO YOUR ATTENTION THE NEED TO GRANT AN EXCEPTION?

A. SO WE CURRENTLY HAVE A GROUP HOME PROVIDER IN

WHICH THEIR INTAKE IS CLOSED. IT WAS A YOUNG PERSON WHO WAS PLACED AT THAT GROUP HOME PREVIOUSLY. I GRANTED THE EXCEPTION FOR THAT YOUNG PERSON TO BE PLACED BACK AT THAT GROUP HOME.

Q. DHS STAFF HAS NEVER BROUGHT TO YOUR ATTENTION SITUATIONS WHERE A CHILD NEEDED TO BE REFERRED TO CATHOLIC, HAVE THEY?

MS. OLIVER: OBJECTION, ASKED AND ANSWERED, YOUR HONOR.

MS. BARCLAY: THIS IS NOT SOMETHING THAT SHE ANSWERED YET, YOUR HONOR. I AM ASKING SPECIFICALLY --

THE COURT: ASK IT AGAIN BECAUSE I THOUGHT IT HAD BEEN ASKED AND ANSWERED.

BY MS. BARCLAY:

Q. DHS STAFF, SINCE THE BEGINNING OF THIS LITIGATION, HAS NOT BROUGHT TO YOUR ATTENTION A SITUATION WHERE IT WOULD BE IN THE BEST INTEREST OF THE CHILD TO BE REFERRED TO CATHOLIC SOCIAL SERVICES?

A. NO.

Q. YOU SAID THAT -- WHEN ASKED WOULD IT BE APPROPRIATE FOR A FOSTER AGENCY TO INFORM A FAMILY ABOUT OTHER SERVICES OFFERED, YOU SAID ONLY AT THE REQUEST OF THAT FOSTER PARENT, CORRECT?

A. YES.

Q. SO IT WOULD BE INAPPROPRIATE FOR AN AGENCY TO

NOTIFY A FAMILY ABOUT, FOR EXAMPLE, LANGUAGE SERVICES OF ANOTHER AGENCY IF THE FOSTER FAMILY DID NOT SPECIFICALLY ASK ABOUT THAT?

A. YES. I WOULD EXPECT THAT FOSTER-CARE AGENCY TO TELL THEM WHAT TYPE OF SERVICES THEY OFFER AT THEIR PARTICULAR AGENCY, KNOWING THAT OUR CHILDREN ARE ASSIGNED TO AND FAMILIES ARE ASSIGNED TO ALL TEN CUA'S, SO THE --

Q. I AM NOT TALKING ABOUT CUA'S. I'M TALKING ABOUT FOSTER AGENCIES.

A. IN ALL FOSTER-CARE AGENCIES. SO WE WOULD EXPECT THE FOSTER-CARE AGENCY TO BE ABLE TO PROVIDE LANGUAGE SERVICES TO CHILDREN OR YOUTH WHO ARE PLACED IN THEIR FOSTER-CARE AS WELL AS THE PARENTS.

Q. IS IT A REQUIREMENT OF THE CONTRACT THAT ALL FOSTER AGENCIES PROVIDE LANGUAGE SERVICES?

A. I AM UNSURE.

Q. SO A FOSTER AGENCY WOULD NEED TO FIRST LET A FAMILY KNOW ABOUT ANY LANGUAGE SERVICES, IF ANY, THAT THAT FOSTER AGENCY ITSELF OFFERED, RIGHT?

A. IF THAT WAS THE QUESTION.

Q. WELL, IF A FAMILY -- SAY A LATINO FAMILY APPROACHED AN AGENCY, THAT FOSTER AGENCY WOULD, ACCORDING TO YOU, FIRST NEED TO NOTIFY THE LATINO FAMILY ABOUT ANY LANGUAGE SERVICES THAT FOSTER AGENCY PROVIDED,

CORRECT?

A. YES.

Q. AND THE AGENCY COULD NOT NOTIFY THEM ABOUT SERVICES OFFERED BY OTHER AGENCIES UNLESS THE FAMILY SPECIFICALLY ASKED FOR INFORMATION ABOUT OTHER AGENCIES?

MS. OLIVER: OBJECTION.

THE COURT: SUSTAINED. I THINK WE HAVE GONE FAR AFIELD TO THE RECROSS.

BY MS. BARCLAY:

Q. YOU SPOKE IN YOUR TESTIMONY ABOUT THE IMPORTANCE OF LETTING FAMILIES CHOOSE THE AGENCY THAT THEY WANT TO WORK WITH, CORRECT?

A. YES.

Q. AND DO YOU BELIEVE THAT IT'S ALSO IMPORTANT FOR MRS. PAUL AND MS. FULTON AND MS. TONI SIMMS-BUSCH TO BE ABLE TO CHOOSE THE AGENCY THEY WANT TO WORK WITH?

A. YES.

MS. BARCLAY: THANK YOU. NO FURTHER QUESTIONS.

THE COURT:

MS. OLIVER: YOUR HONOR, I HAVE NO REDIRECT. HOWEVER, I'D ASK TO RESERVE THE RIGHT TO RECALL MS. ALI AFTER THE PLAINTIFFS REST.

THE COURT: YES.

YOU MAY STEP DOWN.

THE WITNESS: THANK YOU.

(WITNESS EXCUSED.)

THE COURT: YOU MAY CALL YOUR WITNESS.

MR. RIENZI: YOUR HONOR, ARE YOU ASKING FOR PLAINTIFFS TO PRESENT THEIR NEXT WITNESS?

THE COURT: YES.

MS. BARCLAY: YOUR HONOR, THE PLAINTIFFS WOULD LIKE TO CALL MR. JAMES AMATO TO THE STAND.

MS. WINDHAM: YOUR HONOR, IF I MAY, WE ARE CALLING MR. AMATO TO THE STAND TODAY. THERE WAS DISCUSSION YESTERDAY ABOUT THE DECLARATIONS OF BISHOP MCINTYRE AND JAMES BLACK. WE BELIEVE THAT MR. AMATO'S TESTIMONY TODAY WILL BE ABLE TO COVER THE RELEVANT PORTIONS OF THE TESTIMONY OF BISHOP MCINTYRE AND JAMES BLACK.

I WOULD ALSO NOTE FOR THE COURT THAT MR. AMATO'S DECLARATION ALREADY AUTHENTICATED A NUMBER OF DOCUMENTS WHICH WERE ATTACHED TO PLAINTIFF'S MOTION.

THE COURT: OKAY. IT'S NOTED.

(WITNESS SWORN.)

THE CLERK: STATE AND SPELL YOU NAME FOR THE RECORD, PLEASE.

THE WITNESS: JAMES AMATO, A-M-A-T-O.

DIRECT EXAMINATION

BY MS. BARCLAY:

Q. GOOD AFTERNOON, MR. AMATO.

A. GOOD AFTERNOON.

Q. WHAT IS YOUR CURRENT RELATIONSHIP TO CATHOLIC SOCIAL SERVICES?

A. I SERVE AS A SECRETARY FOR CATHOLIC HUMAN SERVICES, OVERSEE CATHOLIC SOCIAL SERVICES AND NUTRITIONAL DEVELOPMENT SERVICES.

Q. IN WHAT CITY DO YOU CURRENTLY LIVE?

A. PHILADELPHIA.

Q. HOW LONG HAVE YOU LIVED THERE?

A. MY LIFE, MY WHOLE LIFE.

Q. CAN YOU TELL ME A LITTLE BIT ABOUT YOUR WORK EXPERIENCE IN THE CHILD WELFARE ARENA?

A. YES. I HAVE BEEN INVOLVED IN CHILD WELFARE SINCE 1976 WHEN I GRADUATED FROM TEMPLE WITH A DEGREE IN SOCIAL WORK. WORKED FOR A COUPLE OF YEARS IN RESIDENTIAL CARE FOR CHILDREN AT AN AGENCY AFFILIATED WITH THE ARCHDIOCESE, AND THEN WENT ON TO GET A MASTER'S DEGREE IN SOCIAL WORK AND WORKED AT CHILDREN'S AID SOCIETY AND FOSTER-CARE AGENCY FOR A COUPLE OF YEARS. AND THEN MOVED INTO PROGRESSIVE MANAGEMENT, RUNNING A HOME FOR CHILDREN RUN BY CATHOLIC SOCIAL SERVICES, AND THEN INTO SENIOR MANAGEMENT.

Q. HOW LONG TOTAL HAVE YOU BEEN WORKING IN CHILD WELFARE?

A. 42 YEARS.

Q. CAN YOU DESCRIBE A LITTLE BIT MORE ABOUT YOUR ROLE AT CATHOLIC SOCIAL SERVICES?

A. MY ROLE INVOLVES TWO THINGS BASICALLY. ONE, I AM THE EXECUTIVE VICE-PRESIDENT OF ALL 13 OF OUR NONPROFIT CORPORATIONS, AND I MANAGE THE OPERATIONS, THE DAILY OPERATIONS OF THE CATHOLIC HUMAN SERVICES.

Q. AND CAN YOU TELL US A LITTLE BIT ABOUT THE WAY IN WHICH CATHOLIC SOCIAL SERVICES AS A NONPROFIT ORGANIZATION IS ORGANIZED?

A. CATHOLIC SOCIAL SERVICES IS ORGANIZED INTO SEVERAL DIFFERENT DIVISIONS. YOUTH SERVICES IS A PROMINENT DIVISION. DEVELOPMENTAL PROGRAM SERVING THOSE WITH INTELLECTUAL DISABILITIES. HOUSING AND HOMELESS AND FAMILY BASED SERVICES. AND WE ALSO HAVE CATHOLIC HOUSING AND COMMUNITY SERVICES, WHICH ADDRESSES THE NEEDS OF SENIORS.

Q. DOES SENIOR LEADERSHIP REPORT TO YOU?

A. YES.

Q. AND DO YOU HAVE A HAND IN BOTH GOVERNANCE AND OPERATIONS?

A. I DO.

Q. I BELIEVE CATHOLIC SOCIAL SERVICES HAS TWO PROGRAMS RELEVANT TO FOSTER CHILDREN. CAN YOU TELL US A LITTLE BIT ABOUT BOTH OF THOSE.

A. THE MOST LONG-STANDING PROGRAM IS CATHOLIC

SOCIAL SERVICES FOSTER-CARE DEPARTMENT, WHICH HAS BEEN -- HAS ITS ROOTS IN 1917 AS THE CATHOLIC CHILDREN'S BUREAU AND THEN GREW INTO CATHOLIC SOCIAL SERVICES FOSTER-CARE DEPARTMENT, TODAY SERVING ABOUT 120 SOME CHILDREN AND 100 FOSTER HOMES. AND WE ALSO HAVE OUR RESIDENTIAL SERVICES FOR ADJUDICATED DELINQUENT YOUTH, RUN BY SAINT GABRIEL'S SYSTEM AND DEPENDENT ADOLESCENT, TEENS, BOYS AND GIRLS, RUN BY ST. FRANCIS AND ST. VINCENT'S HOMES.

Q. DOES CATHOLIC SOCIAL SERVICES ALSO HAVE A CUA?

A. WE ALSO HAVE A CUA THAT HANDLES MOST OF NORTHEAST PHILADELPHIA.

Q. I WANT TO TALK TO YOU A LITTLE BIT ABOUT THE RELIGIOUS MINISTRY OF CATHOLIC SOCIAL SERVICES. CAN YOU TELL US SOME OF THE WAYS IN WHICH, ON A DAILY OR WEEKLY BASIS, CATHOLIC SOCIAL SERVICES IS OPERATING IN A RELIGIOUS FASHION?

A. YES. ALL OF OUR MEETINGS BEGIN WITH -- AND MANY TIMES END WITH PRAYER. OUR FACILITIES ALL HAVE CHAPELS. THEY ARE WELL USED BY STAFF. AND THAT OUR CATHOLIC IDENTITY IS VERY APPARENT IN OUR RELIGIOUS ARTIFACTS ON THE WALLS AND THOSE KINDS OF THINGS.

Q. AND HOW FREQUENTLY IS PRAYER INVOLVED IN WHAT YOU DO?

A. DAILY, SEVERAL TIMES DAILY.

Q. HOW HAS YOUR RELIGIOUS MISSION BEEN MADE APPARENT TO THOSE YOU INTERACT WITH, INCLUDING THE CITY?

A. WELL, AS FAR AS THE CITY GOES, EVERY YEAR WE SUBMIT A PROGRAM DESCRIPTION THAT I BELIEVE IS PART OF THE CONTRACT, AND THAT CLEARLY IDENTIFIES OUR CATHOLIC IDENTITY, OUR HISTORY AND OUR MISSION, SO THAT'S VERY CLEAR. ALSO WE DO A LOT IN ORIENTATION TRAINING WITH STAFF THAT UNDERLINES THE IMPORTANCE OF THAT TO WHO WE ARE AND WHY WE DO WHAT WE DO.

Q. HOW MANY AT-RISK CHILDREN WERE SERVED ACROSS ALL CATHOLIC SOCIAL SERVICES PROGRAMS LAST YEAR?

A. OVER 1500.

Q. IS PROVIDING FOSTER-CARE SERVICES A RELIGIOUS MINISTRY FOR CATHOLIC SOCIAL SERVICES?

A. THE CHURCH'S CARE FOR ORPHANS -- WHICH IS AN OUTDATED WORD -- AND AT-RISK CHILDREN IS CENTURIES OLD. IN PHILADELPHIA IT DATES BACK TO 1797, WHEN WE RESPONDED TO THE NEEDS OF CHILDREN WHOSE FAMILIES -- PARENTS HAD DIED DUE TO YELLOW FEVER. SO INTRINSIC TO WHO WE ARE AND WHAT WE DO IS THE CARE OF AT-RISK CHILDREN AND WHO ARE MANY TIMES THE POOREST CHILDREN IN OUR COMMUNITIES.

Q. AND SO JUST TO CONFIRM, IS FOSTER-CARE SERVICES A RELIGIOUS MINISTRY OF CATHOLIC SOCIAL SERVICES?

A. IT ABSOLUTELY IS, YES.

Q. YOU MENTIONED SOME OF THE ROOTS OF YOUR PROGRAM

WAS THE EPIDEMIC OF YELLOW FEVER. DID THAT ULTIMATELY FORMALIZE IN A SPECIFIC PROGRAM IN THE EARLY 1900'S?

A. YES. THE FIRST RESPONSE WAS THAT, AND THEN THAT GREW INTO THE ORPHANAGE MOVEMENT IN THE MID-19TH CENTURY. AND THAT FOLLOWED BY THE ESTABLISHMENT OF THE CATHOLIC CHILDREN'S BUREAU IN 1917, WHICH WAS DEDICATED TO FOSTER-CARE.

Q. SO THAT 1917 CATHOLIC CHILDREN'S BUREAU WAS PROVIDING FOSTER-CARE TO CHILDREN?

A. YES.

Q. WAS THERE ANY GOVERNMENT INVOLVEMENT WITH THIS PROGRAM IN 1917?

A. TO MY UNDERSTANDING, NO.

Q. HOW DID IT WORK? HOW DID YOU FIND CHILDREN AND CARE FOR THEM? CAN YOU WALK US THROUGH THAT A LITTLE BIT?

A. WELL, THE RELIGIOUS SISTERS WHO RAN CATHOLIC CHILDREN'S BUREAU HAD A DEEP NETWORK OF RELATIONSHIPS AROUND THE CITY WITH PARISHES AND COMMUNITY GROUPS. AND WHEN IT BECAME KNOWN THAT A CHILD WAS AT RISK, THEY WOULD DO A HOME EVALUATION. IF THE CHILD NEEDED TO BE REMOVED -- IN THOSE TIMES, MANY TIMES THE PARENTS WOULD AGREE TO THAT, BECAUSE THEY ARE CALLED VOLUNTARY PLACEMENT. THE CHILD WOULD BE REMOVED, PLACED IN A FOSTER HOME AND WE WOULD TRACK THEM AND THE CHILD'S

PROGRESS IN THAT HOME.

Q. I THINK YOU SAID WERE THESE NETWORKS KNOWN THROUGH CATHOLIC PARISHES?

A. CATHOLIC PARISHES WERE A GREAT SOURCE OF REFERRALS FOR THAT PROGRAM.

Q. SO WHEN DID CATHOLIC PARTNERSHIP WITH GOVERNMENT BEGIN TO PROVIDE THESE SERVICES?

A. WELL, I CAME INTO THE WORK IN 1976, AND I CAN TELL YOU THEN, IT WAS WELL ESTABLISHED. SO MY GUESS IS THAT THIS HAPPENED IN THE LATE '40'S, EARLY '50'S, THAT THE CONTRACTS BECAME INVOLVED WITH GOVERNMENT.

Q. AND AT THAT POINT WHEN THE GOVERNMENT BECAME INVOLVED, IS IT YOUR UNDERSTANDING THAT THE GOVERNMENT TOOK OVER ALL ASPECTS OF IT OR WERE THERE THINGS THAT CATHOLIC SOCIAL SERVICES WAS STILL DOING AT THE BEGINNING OF THAT PARTNERSHIP?

MR. FIELD: YOUR HONOR, I OBJECT, THE WITNESS SAID HE WAS NOT AROUND WHEN THE GOVERNMENT BECAME INVOLVED.

THE COURT: TO THE EXTENT HE KNOWS THE HISTORY, I AM GOING TO OVERRULE THE OBJECTION.

THE WITNESS: SO REPEAT THE QUESTION, PLEASE.

BY MS. BARCLAY:

Q. SURE. SO WHEN THIS GOVERNMENT PARTNERSHIP BEGAN, WHAT IS YOUR UNDERSTANDING AS FAR AS THE ROLE THAT CATHOLIC SOCIAL SERVICES WOULD PLAY WITH REGARD TO

REMOVING AND PLACING CHILDREN AND THE ROLE THAT THE GOVERNMENT PLAYED.

A. CATHOLIC SOCIAL SERVICES, TO MY UNDERSTANDING AT THOSE TIMES, HAD TREMENDOUS OVERSIGHT OF THE INTAKE FUNCTION. SO THAT ONCE A CHILD BECAME KNOWN TO BE AT RISK AND WAS EVALUATED AS SUCH, WE WOULD PLACE THE CHILD AND SIMPLY ADVISE THE CITY THAT THERE WAS A VOLUNTARY PLACEMENT AND THEY WOULD THEN MOVE FORWARD AND SUPPORT THAT.

Q. BY THE TIME YOU JOINED CATHOLIC SOCIAL SERVICES IN THE '70'S, HOW HAD THE ROLES CHANGED AS FAR AS WHAT THE GOVERNMENT WAS IN CHARGE OF?

A. WELL, THINGS CHANGED FOR THE BETTER AND THEY CHANGED SWIFTLY. AND THEY'RE NOW -- IN MY TIME FROM THE MID-'70'S ON, ALL THE INTAKE WAS HANDLED THROUGH THE DEPARTMENT OF HUMAN SERVICES, AND THAT WAS DONE AFTER A CHILD PROTECTIVE SERVICES INVESTIGATION, THE CHILD WAS SEEN AS NEEDING TO BE PLACED.

Q. NOW AT THIS TIME IS CATHOLIC SOCIAL SERVICES AUTHORIZED TO PROVIDE FOSTER-CARE SERVICES WITHOUT A GOVERNMENT CONTRACT?

A. YOU REALLY CAN'T DO IT WITHOUT A GOVERNMENT CONTRACT.

Q. SO YOU WOULD BE BREAKING THE LAW IF YOU TRIED TO PROVIDE FOSTER-CARE SERVICES WITHOUT A CONTRACT?

A. YES.

Q. DOES CATHOLIC SOCIAL SERVICES MAKE MONEY FROM THIS GOVERNMENT CONTRACT IN PROVIDING THESE SERVICES?

A. ABSOLUTELY NOT. AND JUST TO GIVE YOU AN IDEA IN -- LAST YEAR WE SUBSIDIZED THESE SERVICES TO THE TUNE OF $3.8 MILLION.

Q. WHERE DO THOSE SUBSIDIES COME FROM?

A. THEY COME FROM ENDOWMENTS, DONATIONS AND GENERAL ARCHDIOCESAN SUPPORT.

Q. YESTERDAY THE ATTORNEYS FOR DHS REFERRED TO CATHOLIC SOCIAL SERVICES AS A BUSINESS. IS THAT HOW YOU THINK OF YOUR WORK?

A. I REALLY DON'T KNOW OF ANY BUSINESS THAT WOULD START OR BE ABLE TO FINISH WITH A $3.8 MILLION SUBSIDY. I NEVER THOUGHT OF IT AS A BUSINESS.

Q. SO BEFORE YESTERDAY, HAVE YOU EVER HEARD THAT?

A. NEVER.

Q. HOW WOULD YOU DESCRIBE THE WORK THAT CATHOLIC SOCIAL SERVICES IS DOING?

A. A RELIGIOUS MINISTRY BASED ON A NONPROFIT CORPORATION -- CORPORATIONS THAT HAVE A DEEP COMMITMENT TO THE POOR AND THE VULNERABLE IN OUR COMMUNITY.

Q. I WANT TO TALK TO YOU A LITTLE BIT MORE ABOUT SOME OF THE LOGISTICS OF FOSTER-CARE. WHEN CATHOLIC SOCIAL SERVICES PERFORMS A HOME STUDY, WHAT DOES THAT

PROCESS ENTAIL?

A. IT ENTAILS AN ASSESSMENT OF THE RELATIONSHIPS THAT EXIST IN THAT FOSTER HOME, THE SUITABILITY OF THE PHYSICAL PLAN OF THE FOSTER HOME TO BE SAFE FOR A CHILD, AND THEN OBVIOUSLY GETTING CLEARANCES TOO FOR EVERYBODY IN THE HOME. IF ALL OF THOSE THINGS ARE UP TO PAR, THEN WE -- THEN THE HOME IS CERTIFIED AS A FOSTER HOME AND THE HOME STUDY IS COMPLETE.

Q. DOES CATHOLIC SOCIAL SERVICES REQUEST A PASTORAL REFERENCE AS PART OF THAT PROCESS?

A. IT REQUESTS A REFERENCE FROM CLERGY FOR ALL INTERESTED PEOPLE WHO APPLY TO BE FOSTER PARENTS.

Q. SO IS IT CORRECT THAT THEY ASK FOR A PASTORAL REFERENCE?

A. YES, THEY REQUEST A PASTORAL REFERENCE.

Q. WITH REGARD TO THE RELATIONSHIPS THAT YOU SAID THAT YOU WOULD ANALYZE, DOES THIS PROCESS CULMINATE IN ANYTHING RELEVANT TO THOSE RELATIONSHIPS AS FAR AS WRITING THAT YOU WOULD PROVIDE?

A. THE PROCESS CULMINATES AFTER THE EVALUATION IS DONE AND A CERTIFIED HOME STUDY, WHICH WOULD ENABLE THE FAMILY TO ACTUALLY BEGIN RECEIVING CHILDREN IN THEIR HOME.

Q. DOES THAT HOME STUDY INCLUDE ANY WRITTEN ENDORSEMENTS OF THOSE RELATIONSHIPS?

A. IT IS -- THE HOME STUDY IS A WRITTEN EVALUATION, YES.

Q. AND AN ENDORSEMENT?

A. AND AN ENDORSEMENT, YES.

Q. ARE YOU AWARE OF ANY POLICY OR LAW THAT SAYS THAT AN AGENCY MUST CERTIFY ANY QUALIFIED PROSPECTIVE FOSTER FAMILY THAT WANTS TO BE CERTIFIED BY THAT AGENCY?

A. NO, I AM NOT AWARE OF THAT LAW.

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS BEEN LABELED AND IT'S EXHIBIT NUMBER 4. MR. AMATO, I HAVE APPROACHED YOU WITH WHAT IS DESCRIBED AS PENNSYLVANIA STATE RESOURCE -- FAMILY ASSOCIATION RESOURCE PARENT MANUAL. ARE YOU FAMILIAR WITH THIS DOCUMENT?

A. I HAVE HEARD OF IT, YES.

Q. AND AT THE TOP OF PAGE 7, IT SAYS THAT: NOTE, THESE ARE MINIMUM REQUIREMENTS AND INDIVIDUAL AGENCIES WILL VARY WITH THEIR POLICIES. IS THAT CONSISTENT WITH YOUR UNDERSTANDING THAT AGENCIES CAN HAVE THEIR OWN ADDITIONAL REQUIREMENTS OR CONSIDERATIONS FOR WHY THEY WOULD CERTIFY A FOSTER PARENT?

A. YES, IT IS.

Q. WHAT ARE THE RELIGIOUS BELIEFS OF CATHOLIC SOCIAL SERVICES WITH RESPECT TO MARRIAGE?

A. THAT A MARRIAGE IS A SACRED BOND BETWEEN A MAN AND A WOMAN.

Q. ACROSS ALL PROGRAMS WHAT DOES THAT MEAN FOR LGBTQ INDIVIDUALS WHO MIGHT WANT OR NEED SERVICES FROM CATHOLIC?

A. WE REGULARLY SERVE PROUDLY PEOPLE OF ALL FAITHS, ALL BACKGROUNDS, WITHOUT REGARD TO SEXUAL IDENTITY, SO THAT TODAY WE ARE SERVING FOLKS FROM THE LGBTQ COMMUNITY.

Q. WHAT ABOUT THE SAME-SEX COUPLES WHO APPROACHED CATHOLIC ABOUT RECEIVING A HOME STUDY SERVICE TO BECOME FOSTER PARENTS? HAS THAT SITUATION EVER ARISEN?

A. WELL, THAT SITUATION HAS NOT ARISEN, AND -- TO MY KNOWLEDGE SINCE THE TIME THAT I'VE BEEN IN CATHOLIC SOCIAL SERVICES.

Q. AND HYPOTHETICALLY SPEAKING, IF CATHOLIC WERE FORCED TO PROVIDE A WRITTEN CERTIFICATION ENDORSING A SAME-SEX MARRIAGE, WOULD THAT VIOLATE THE RELIGIOUS EXERCISE OF CATHOLIC SOCIAL SERVICES?

A. YES, IT WOULD.

Q. I WANT TO TALK TO YOU A LITTLE BIT ABOUT SOME OF THE STRENGTHS AND HALLMARKS OF CATHOLIC SOCIAL SERVICES

FOSTER-CARE PROGRAM. WHAT WOULD YOU DESCRIBE AS SOME OF THE STRENGTHS AND UNIQUE ASPECTS OF YOUR PROGRAM?

A. I THINK THE KEY STRENGTH IS THE ACCUMULATED KNOWLEDGE AFTER DOING IT FOR 100 YEARS. THE STAFF, OUR TURNOVER IS VERY, VERY LOW. THE STAFF HAS EXCELLENT RELATIONSHIPS WITH THE FOSTER PARENTS AND I THINK THAT LEADS TO -- WE KEEP OUR CASE LOADS LOW SO THAT WE CAN CONTINUE TO PROVIDE ADEQUATE SUPPORT, AND I THINK THAT KIND OF RESULTS IN SOME OF THE THINGS THAT WE HEARD YESTERDAY.

Q. IT IS YOUR UNDERSTANDING THAT YOUR CASE LOADS ARE DELIBERATELY LOWER THAN MANY OTHER AGENCIES?

A. ABSOLUTELY, PARTICULARLY NOW WITH THE NEW STANDARDS THAT COME WITH THE CUA.

Q. HOW LONG HAS YOUR LONGEST STAFF MEMBER BEEN THERE?

A. OVER 35 YEARS.

Q. HOW DO YOU THINK THE CONTINUITY WITH YOUR STAFF IMPACTS THE CHILDREN THAT YOU SERVE?

A. WHAT I HAVE HEARD AND WITNESSED IS OUR FOSTER PARENTS CAN CALL AT ANY TIME AND GET ACCESS TO OUR SOCIAL WORKERS. BUT IF THEY CAN'T, WE HAVE BOB MONTORO RUNNING IT WHO HAS BEEN THERE FOR MANY YEARS. WE HAVE CHRISTY REED, THE SUPERVISOR, WHO HAS BEEN THERE FOR MANY YEARS. AND WE HAVE AN EILEEN MULLEN WHO IS A CASE

WORKER WHO HAS DONE MOST OF THESE HOME STUDY, WHO HAS BEEN THERE ABOUT 35 YEARS, AND SHE IS READILY AVAILABLE AND ACCESSIBLE AND I FIND THAT FOSTER PARENTS SEE THAT AS A GREAT SOURCE OF SUPPORT AND HOPE.

Q. FROM YOUR PERSONAL EXPERIENCE HAVE YOU EVER OBSERVED THERE TO BE A SURPLUS -- OR WHICH HAVE YOU OBSERVED, A SURPLUS OR A SHORTAGE OF FOSTER FAMILIES FOR FOSTER CHILDREN?

A. ABSOLUTELY THERE IS A SHORTAGE OF FOSTER FAMILIES FOR CHILDREN, PARTICULARLY ADOLESCENT CHILDREN.

Q. WHAT LED YOU TO ARRIVE AT THIS CONCLUSION?

A. READING, GOING TO MEETINGS WITH THE SENIOR MANAGEMENT FROM DHS, SEEING SOME OF THE CHILDREN THAT WE HAVE SERVED IN GROUP CARE THAT HAVE THE PROFILE THAT COULD BE MATCHED WITH A FOSTER FAMILY BUT THERE'S SIMPLY NOT SUFFICIENT FAMILIES FOR THE ADOLESCENT CHILDREN.

Q. WHAT PHYSICALLY HAPPENS -- WHAT ELSE PHYSICALLY HAPPENS TO CHILDREN WHEN THERE ARE NOT ENOUGH FOSTER HOMES FOR CHILDREN?

A. I THINK THE MOST SAD THING THAT HAPPENS IS THAT A CHILD WOULD HAVE TO WAIT AND SIT IN THE CHILD CARE ROOM AT THE CITY WHILE AGENCIES ARE APPROPRIATELY PRESSED TO FIND A FOSTER HOME FOR THEM. THAT WOULD BE ONE ITEM THAT WE ALL ARE TRYING TO AVOID. NUMBER TWO WOULD BE THE POTENTIAL PLACEMENT OF A YOUNG KID IN A

CONGREGATE CARE SHELTER, WHICH NOW BEST PRACTICE SAYS IS NOT THE BEST WAY TO GO. SO THOSE WOULD BE JUST TWO OF THE THINGS THAT WOULD COME TO MIND.

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR?

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 5.

MR. FIELD: YOUR HONOR, MAY WE HAVE A MOMENT TO REVIEW THIS EXHIBIT? WE HAVE NOT SEEN THIS DOCUMENT BEFORE.

THE COURT: OKAY. I AM GOING TO TAKE A BRIEF RECESS. I HAVE ANOTHER MATTER I HAVE TO HANDLE. I WILL BE ABOUT TEN MINUTES.

THE CLERK: ALL RISE.

(BRIEF RECESS.)

THE COURT: OKAY. YOU MAY BE SEATED.

MS. BARCLAY: MAY WE RESUME?

MR. FIELD: YOUR HONOR, I WOULD ASK AN OFFER OF PROOF ON THIS EXHIBIT, IS IT P-5?

THE COURT: YES.

MS. BARCLAY, CAN YOU IDENTIFY IT FIRST FOR THE RECORD.

MS. BARCLAY: THIS IS THE CERTIFICATE GRANTED

TO PHILADELPHIA DHS TO OPERATE PHILADELPHIA COUNTY CHILDREN AND YOUTH SERVICES AND DISCUSSES SOME OF THE ISSUES THAT DHS WAS FACING WITH REGARD TO BEING ABLE TO HAVE ENOUGH HOMES TO PLACE CHILDREN. AND IT IS RELEVANT TO ANOTHER DOCUMENT THAT WE WILL BE DISCUSSING THAT CATHOLIC SOCIAL SERVICES PROVIDED TO DHS TO TRY AND ASSIST WITH THIS PROBLEM.

THE COURT: OKAY.

MR. FIELD: YOUR HONOR, I APOLOGIZE. DHS IS A LARGE ORGANIZATION WITH A LONG HISTORY. THIS IS A DOCUMENT FROM 2016. I AM NOT CLEAR ON THE RELEVANCE OF THE ENTIRETY OF DHS'S HISTORY OF THE CARE WITH CHILDREN. THIS LITIGATION, WHICH I UNDERSTAND TO BE ABOUT THIS ALLEGED RELIGIOUS BURDEN AND THE HARMS THAT FLOW THEREFROM. I RESPECTFULLY SUBMIT WE WILL BE HERE A LONG TIME IF WE ARE GOING INTO THE ENTIRETY OF DHS'S CARE -- EVEN RECENT YEARS.

MS. BARCLAY: YOUR HONOR, THERE'S ONLY ONE PARAGRAPH THAT I WILL JUST BRIEFLY READ AND THEN --

THE COURT: I AM GOING TO OVERRULE THE OBJECTION.

BY MS. BARCLAY:

Q. MR. AMATO, IF YOU CAN TURN WITH ME TO THE PAGE THAT IS TABBED, AND I AM JUST GOING TO READ TO YOU. IT SAYS: CHILDREN ARE STAYING AT DHS OVERNIGHT IN THE CHILDCARE ROOM AND AT THE CUA WITHOUT ADEQUATE AND TIMELY PLACEMENT. THE REPORTED NUMBER OF CHILDREN

STAYING OVERNIGHT AT DHS AND CUA COMBINED DURING CALENDAR YEAR 2015 WAS 84. THIS NUMBER IS PROBABLY HIGHER AS SOME CUA'S DID NOT MAINTAIN RECORDS OF WHICH CHILDREN STAYED OVERNIGHT AND WHEN THEY STAYED OVERNIGHT. THIS IS AN UNACCEPTABLE PRACTICE AND AT THE STATE'S REQUEST DHS HAS SUBMITTED A PLAN TO ALLEVIATE THIS CONCERNING ISSUE.

NOW, BEFORE WE RECESSED, YOU WERE DISCUSSING THE ISSUE OF WHEN CHILDREN STAY OVERNIGHT AT THE CHILDCARE ROOM. AND AROUND THIS TIME WAS THERE ANYTHING THAT CATHOLIC SOCIAL SERVICES DID TO TRY AND ASSIST DHS WITH THIS ISSUE?

A. ACTING COMMISSIONER JESSICA SHAPIRO AT THAT TIME APPROACHED ME, KNOWING OUR HISTORY IN PROVIDING EMERGENCY SHELTER FOR CHILDREN, AND ASKED ME FOR A PROPOSAL TO RESUME THAT SHELTER.

MS. BARCLAY: YOUR HONOR, PERMISSION TO APPROACH THE WITNESS.

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 6.

A. YES.

Q. WHAT IS THIS DOCUMENT, MR. AMATO?

A. THIS IS THE COVER LETTER THAT ACCOMPANIED THE

BUDGET PROPOSAL AND A BRIEF DESCRIPTION OF WHAT WE COULD OFFER TO MEET THAT EMERGENT NEED.

Q. JUST DESCRIBE AGAIN FOR US, WHAT WAS THE NEED THAT THIS SHELTER WAS MEANT TO ADDRESS?

A. AN IMMEDIATE RESOURCE - AN IMMEDIATE GROUP CARE RESOURCE FOR UP TO 12 CHILDREN WHO WERE IN -- THERE WAS NOT AN IMMEDIATE FOSTER FAMILY AVAILABLE.

Q. AND SO WAS THIS SHELTER OPTION SEEKING TO MAKE IT SO THAT LESS CHILDREN WOULD END UP STAYING OVERNIGHT IN THAT CHILDCARE ROOM?

A. YES.

Q. ARE YOU AWARE OF INSTANCES WHERE A FOSTER AGENCY WILL CHOOSE NOT TO PERFORM A HOME STUDY FOR A PROSPECTIVE COUPLE FOR VARIOUS REASONS?

A. YES. THERE'S A COUPLE OF REASONS THAT I AM AWARE OF. ONE WOULD BE THE GEOGRAPHICAL LOCATION OF THE FOSTER PARENT, SO THAT IT WOULD BE BETTER FOR THEM TO HAVE THE HOME TO BE DONE TO AN AGENCY CLOSER TO THEM. ANOTHER WOULD BE A SPECIAL MEDICAL SITUATION, WHERE WE WOULD REFER A FOSTER PARENT BECAUSE WE DON'T HAVE A SPECIAL MEDICAL SERVICE, NOR DO WE HAVE A LICENSE FOR THAT. ANOTHER WOULD BE BEHAVIORAL -- A SPECIALIZED BEHAVIORAL HEALTH HOME, BECAUSE AGAIN, WE DON'T PROVIDE SPECIALIZED BEHAVIORAL HEALTH. IT USED TO BE CALLED TREATMENT FOSTER-CARE. THERE ARE ALSO SOME AGENCIES

THAT SPECIALIZE IN FOSTER HOMES FOR TEEN PREGNANT GIRLS AND TEEN MOTHER/BABIES. FURTHER THERE ARE AGENCIES WHO SPECIALIZE, AND ONE IS IN SUBURBAN PHILADELPHIA, IN HOME STUDIES FOR LGBTQ INDIVIDUALS AND COUPLES. AND FINALLY THERE ARE AGENCIES WHO SPECIALIZE IN PROVIDING FOSTER HOMES FOR NATIVE AMERICAN CHILDREN SO THEY ARE PLACED WITH NATIVE AMERICAN FAMILIES.

Q. ARE THERE ALSO AGENCIES WHO HAVE SPECIALTY IN, FOR EXAMPLE, OUTREACH TO THE LATIN AMERICAN COMMUNITY?

A. YES. AND THE TWO THAT COME IMMEDIATELY TO MIND ARE CONCILIO AND APM, WHICH HAVE A DEEP-ROOTED HISTORY IN THE LATINO COMMUNITY. ALMOST ALL STAFF -- I WOULD ASSUME, I THINK ALL, ARE BILINGUAL AND HAVE -- BOTH HAVE QUALITY FOSTER -- AND RECOGNIZED FOSTER-CARE PROGRAMS.

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 7. THIS IS A DOCUMENT FROM CONCILIO'S WEBSITE. IT SAYS THAT: THE PURPOSE OF THIS AGENCY IS TO PROVIDE SOCIAL, EDUCATIONAL, CULTURAL PREVENTION AND INTERVENTION SERVICES AND PROGRAMS TO UNDERSERVED YOUNG PEOPLE AND FAMILIES IN THE PHILADELPHIA REGION AND TO SERVE AS A

COMMUNITY VOICE FOR THE DIVERSE LATINO COMMUNITY ON ISSUES AFFECTING CHILDREN, YOUTH AND FAMILY.

THIS IS CONSISTENT WITH YOUR UNDERSTANDING THAT THIS IS AN AGENCY THAT HAS TARGETED OUTREACH TO THE LATINO COMMUNITY.

MR. FIELD: OBJECTION, YOUR HONOR, ON THE BASIS OF HEARSAY AND RELEVANCE.

THE COURT: SUSTAINED, AS TO RELEVANCE.

MR. FIELD: I ASK THAT THE READING WOULD BE STRICKEN FROM THE RECORD.

THE COURT: IT WILL BE STRICKEN.

BY MS. BARCLAY:

Q. IS IT YOUR UNDERSTANDING THAT THERE ARE ANY AGENCIES WHO SPECIALIZE IN SERVICING KIN CARE POPULATIONS?

A. I THINK THE MOST RENOWNED AGENCY FOR THAT IS SECOND CHANCE.

Q. AND ARE YOU AWARE -- ANY TIME HAS THERE BEEN A TIME WHERE THEY EXCLUSIVELY SERVED KIN CARE POPULATIONS?

A. WHEN THEY FIRST BECAME --

MR. FIELD: OBJECTION.

THE WITNESS: WHEN THEY FIRST BECAME KNOWN TO PHILADELPHIA, MY UNDERSTANDING IS --

THE COURT: OVERRULED.

THE WITNESS: -- THEY WERE ROOTED IN

ALLEGHENY COUNTY WITH AN EXPERTISE IN THE KIN CARE FAMILIES, PARTICULARLY MINORITY KIN CARE FAMILIES.

BY MS. BARCLAY:

Q. THANK YOU.

HAVE YOU EVER UNDERSTOOD IT TO BE A PROBLEM FOR AN AGENCY TO DECLINE TO PERFORM A HOME STUDY AND INSTEAD CONNECT A FAMILY WITH A DIFFERENT AGENCY THAT THE AGENCY BELIEVED WOULD BE A BETTER FIT FOR THEM?

A. NEVER SAW IT AS A PROBLEM. IN FACT, IT'S BEST PRACTICE AND WIDELY KNOWN IN SOCIAL WORK IS INFORMATION REFERRAL TO GET A FAMILY OR AN INDIVIDUAL CONNECTED WITH THE AGENCY THAT CAN BEST SERVE THEM.

Q. SO YOU JUST USED THE TERM "INFORMATION REFERRAL," AND I JUST WANT TO CLARIFY. THAT'S NOT THE SAME THING AS WHEN DHS MAKES A REFERRAL TO AN AGENCY, RIGHT?

A. NO, THAT'S --

MR. FIELD: OBJECTION, LEADING.

THE COURT: OVERRULED.

YOU MAY ANSWER.

THE WITNESS: THAT'S INFORMATION REFERRAL DIRECTLY TO A CLIENT INQUIRING ABOUT A SERVICE THAT HE OR SHE MIGHT BE INTERESTED IN.

BY MS. BARCLAY:

Q. HOW DOES THAT DIFFER FROM THE DHS REFERRAL TO AN

AGENCY?

A. A DHS REFERRAL IS FOR A PARTICULAR HARD SERVICE, FOSTER-CARE, GROUP HOME, THAT KIND OF THING. THE OTHER ONE IS MORE OF A QUERY ABOUT WHERE WILL I BE BEST SERVED.

Q. I WANT TO TALK TO YOU NOW ABOUT THIS PARTICULAR LITIGATION, MR. AMATO. WHEN DID YOU FIRST LEARN THAT THE CITY HAD CONCERNS ABOUT CATHOLIC SOCIAL SERVICES' RELIGIOUS BELIEFS?

THE COURT: I DON'T KNOW THAT THAT IS PROPERLY PHRASED.

MS. BARCLAY: I CAN REPHRASE IT, YOUR HONOR.

THE COURT: OKAY.

BY MS. BARCLAY:

Q. WHEN DID YOU FIRST LEARN THAT THE CITY HAD CONCERNS ABOUT CATHOLIC SOCIAL SERVICES' RELIGIOUS BELIEFS WITH RESPECT TO WRITTEN CERTIFICATIONS THAT CAN PROVIDE TO SAME-SEX COUPLES?

MR. FIELD: OBJECTION, YOUR HONOR.

THE COURT: AGAIN, YOU ARE PUTTING IN THERE "RELIGIOUS BELIEFS." I DON'T THINK THAT THAT IS THE ISSUE. THE ISSUE IS WHETHER OR NOT THEY WERE GOING TO BE CERTIFIED.

MS. BARCLAY: I CAN REPHRASE IT AGAIN, YOUR HONOR.

THE COURT: YES.

MS. BARCLAY: IF YOU CAN WAIT ONE MOMENT.

BY MS. BARCLAY:

Q. OKAY. WHEN DID YOU FIRST LEARN ABOUT THE CITY'S CONCERN WITH THE HYPOTHETICAL SITUATION WHERE CATHOLIC SOCIAL SERVICES WOULD BE UNABLE TO PROVIDE WRITTEN CERTIFICATION FOR SAME-SEX COUPLES?

A. IN MID MARCH FOLLOWING AN EVENT, A PROMOTION THAT THE CITY HELD, DHS HELD, FOR 300 MORE FOSTER FAMILIES, I GOT A CALL ON MY CELL PHONE, I THINK IT WAS A FRIDAY AFTERNOON, FROM COMMISSIONER FIGUEROA AND FIRST DEPUTY SHAPIRO INQUIRING AS TO CATHOLIC SOCIAL SERVICES' POSITION ON PROVIDING HOME STUDIES TO SAME-SEX INDIVIDUALS OR COUPLES.

Q. AND WHAT WAS COMMISSIONER FIGUEROA ASKING YOU?

A. SHE WAS ASKING ME WHETHER WE DO THAT.

Q. WHETHER WE DO WHAT?

A. WHETHER WE WOULD COMPLETE A HOME STUDY ON A SAME-SEX COUPLE OR INDIVIDUAL.

Q. WHAT WAS YOUR RESPONSE?

A. MY ANSWER WAS NO, THAT WE WOULD NOT DO THAT, THAT IT'S AGAINST THE TEACHINGS OF THE CHURCH.

Q. DID THEY SAY ANYTHING TO YOU THEN IN RESPONSE?

A. THEY SAID TO ME THAT YOU ARE DISCRIMINATING. I SAID THAT I AM FOLLOWING THE TEACHINGS OF THE CATHOLIC CHURCH.

Q. AND THIS WAS A PHONE CALL IN MID MARCH?
A. IT WAS A PHONE CALL IN MID MARCH, YES.
Q. DID YOU HAVE A FOLLOWUP IN-PERSON CONVERSATION?
A. THERE WAS A MEETING THE NEXT WEEK WITH DHS SENIOR MANAGEMENT, CATHOLIC SOCIAL SERVICES SENIOR MANAGEMENT, AND ARCHDIOCESAN LEGAL COUNSEL.
Q. WHAT WERE THE THINGS THAT DHS SENIOR MANAGEMENT COMMUNICATED TO YOU AT THAT MEETING?
A. THEIR GREAT CONCERNS ABOUT US NOT COMPLETING HOME STUDIES FOR SAME-SEX INDIVIDUALS AND COUPLES, THE FACT THAT THIS HAD THE HIGHEST ATTENTION, THE ATTENTION AT THE HIGHEST LEVELS OF GOVERNMENT IN THE CITY, AND THAT --
MR. FIELD: YOUR HONOR, HEARSAY.
THE COURT: OVERRULED.
MS. BARCLAY: THIS IS AN ADMISSIBLE PARTY ADMISSION.
THE WITNESS: AND AN INDICATION THAT CATHOLIC SOCIAL SERVICES SHOULD BE FOLLOWING THE TEACHINGS OF POPE FRANCIS RATHER THAN THE ARCHDIOCESE -- RATHER THAN THE ARCHBISHOP OR THE ARCHDIOCESE.
BY MS. BARCLAY:
Q. DID THE CITY SAY ANYTHING ABOUT TIMES CHANGING?
A. YES, WHERE THEY INDICATED WHEN I --
MR. FIELD: OBJECTION. LEADING, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: WHEN I INDICATED THAT THE MISSION COMMITMENT EXPRESSED IN OVER 100 YEARS OF SERVICES, I WAS ADVISED THAT TIMES HAVE CHANGED, ATTITUDES HAVE CHANGED, SCIENCE HAS CHANGED. IT'S TIME FOR -- THE IMPLICIT MESSAGE WAS IT'S TIME FOR THE CATHOLIC CHURCH -- CATHOLIC SOCIAL SERVICES TO CHANGE.

BY MS. BARCLAY:

Q. AND JUST TO CONFIRM, I APOLOGIZE YOU WERE INTERRUPTED BEFORE. WHAT DID THEY SAY ABOUT THE TOP CITY OFFICIALS?

A. WITHOUT NAMING NAMES, THEY INDICATED THAT IT HAD THE ATTENTION OF TOP LEVELS OF GOVERNMENT, WHICH I WOULD ASSUME WOULD BE MAYOR KENNEY AND CITY COUNCIL.

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE COURT: SUSTAINED.

MS. BARCLAY: THAT'S FINE, YOUR HONOR.

BY MS. BARCLAY:

Q. THE SUBSTANCE OF THAT MEETING, WAS THAT INQUIRING ABOUT ANYTHING ELSE RELEVANT TO CATHOLIC SOCIAL SERVICES?

A. NO. IT WAS STRICTLY AROUND THE MATTER THAT WE JUST DISCUSSED.

Q. DID THEY ASK ABOUT -- DID THEY TELL YOU IN THAT MEETING THAT THERE WOULD BE A REFERRAL FREEZE?

A. SURPRISINGLY, NO. AND IT WAS KIND OF ODD TO GET A CALL FIVE MINUTES LATER WHEN WE WERE WALKING BACK TO THE ARCHDIOCESE FROM DEPUTY COMMISSIONER ALI, TELLING US THAT WE FORGOT TO MENTION SOMETHING, YOUR REFERRALS WOULD BE FROZEN.

Q. SO THAT WAS TEN MINUTES AFTER THE IN-PERSON MEETING?

A. CORRECT, YES.

Q. SO I WILL GO BACK TO THAT. YOU MENTIONED THERE WAS SOME DISCUSSION OF THE POPE FROM DHS AT THAT MEETING. DO YOU REMEMBER EXACTLY WHAT THEY SAID ABOUT THE POPE?

THE COURT: WHO SAID?

BY MS. BARCLAY:

Q. IT WAS COMMISSIONER FIGUEROA, CORRECT?

A. IT WAS.

Q. WHAT DID COMMISSIONER FIGUEROA SAY ABOUT THE POPE?

A. THAT WE SHOULD BE LISTENING MORE TO POPE FRANCIS THAN THE ARCHBISHOP AND THE ARCHDIOCESE'S POSITION ON THIS.

Q. SO MOVING FORWARD AGAIN TO WHEN YOU RECEIVED THAT FOLLOW-UP PHONE CALL ABOUT THE REFERRAL FREEZE, WHO WAS ON THE PHONE 10 MINUTES LATER FOR THAT FOLLOW-UP PHONE CALL?

A. DEPUTY COMMISSIONER ALI.

Q. JUST COMMISSIONER ALI?

A. YES.

Q. AND DID SHE EXPLAIN WHY THERE WAS GOING TO BE A REFERRAL FREEZE?

A. NO. IT WAS PRETTY SHORT AND TO THE POINT, AND IT WAS BASED ON THE MEETING. WE FORGET TO MENTION THAT, SO WE ARE MENTIONING IT TO YOU NOW.

Q. DID THEY INDICATE THAT THERE WOULD BE ANY SORT OF EXCEPTION FOR THE BEST INTERESTS OF CHILDREN TO THIS REFERRAL FREEZE AT THIS TIME?

A. NO. IT WAS ABSOLUTE, NO REFERRALS AND NO TALK OF ANY EXCEPTIONS.

Q. SO IS YOUR -- WHAT IS YOUR UNDERSTANDING AS FAR AS THE SOLE REASON FOR THIS REFERRAL FREEZE?

A. THAT CATHOLIC SOCIAL SERVICES IN ITS STATEMENTS HAD SAID THEY WOULD NOT GO FORWARD WITH THE HOME STUDIES, COMPLETING HOME STUDIES FOR SAME-SEX INDIVIDUALS AND COUPLES.

Q. BEFORE THIS LAWSUIT HAVE YOU EVER HEARD TO -- SERVICES PROVIDING A HOME STUDY DESCRIBED AS A PUBLIC ACCOMMODATION?

A. NEVER HEARD OF THAT BEFORE.

Q. HAD YOU EVER HEARD OF FOSTER-CARE GENERALLY BEING DESCRIBED AS A PUBLIC ACCOMMODATION?

A. NO.

Q. WHEN WAS THE FIRST TIME YOU HEARD OF FOSTER-CARE BEING DESCRIBED IN THAT WAY?

A. WHEN I WENT TO THAT MEETING WITH THE COMMISSIONER. SHE WAS QUOTING THAT FROM THE CONTRACT.

Q. WHAT DID THE COMMISSIONER SAY ABOUT PUBLIC ACCOMMODATIONS IN THAT MEETING?

A. BASICALLY A PUBLIC ACCOMMODATION IS ANYTHING THAT GETS PUBLIC FUNDING. SO IF YOU GET PUBLIC FUNDING, YOU HAVE TO FOLLOW THROUGH WITH THAT EXPECTATION.

Q. IT WAS THEIR POSITION THAT YOU WERE NOT COMPLYING WITH THE PUBLIC ACCOMMODATION REQUIREMENTS?

A. THAT WAS THEIR POSITION.

Q. AND WAS THEIR POSITION THAT YOU NEEDED TO DO HOME STUDY FOR ANYONE THAT APPLIED?

A. YES.

Q. COMMISSIONER FIGUEROA'S DECLARATION CLAIMS THAT YOU TOLD HER CSS, QUOTE, "COULD NOT COMPLY WITH ITS CONTRACT," END QUOTE. SHE USES THAT PHRASING TWICE. DID YOU SAY THAT TO HER?

A. NOT TO MY KNOWLEDGE OR RECOLLECTION.

Q. WHAT DID YOU SAY?

A. I SAID THAT CATHOLIC SOCIAL SERVICES, DUE TO ITS RELIGIOUS TEACHINGS, WOULD NOT MOVE FORWARD WITH A HOME STUDY FOR A SAME-SEX COUPLE, BUT WOULD IMMEDIATELY REFER

THAT COUPLE TO ONE OF THE OTHER 28 OR SO AGENCIES WHO WOULD COMPLETE SUCH A HOME STUDY.

Q. WHEN DID YOU FIRST LEARN THAT EXCEPTIONS MIGHT BE GRANTED FOR CHILDREN TO BE PLACED WITH CATHOLIC SOCIAL SERVICES IN THE BEST INTEREST OF THE CHILD?

A. I AM GOING TO SAY ROUGHLY AROUND MARCH 25 A REFERRAL CAME TO OUR FOSTER-CARE DEPARTMENT, AND I WAS IMMEDIATELY NOTIFIED THAT REFERRAL IS FROM A CUA. I BELIEVE IT WAS AN EMERGENCY SITUATION WHERE A SIBLING OF TWO CHILDREN BEING IN A CATHOLIC SOCIAL SERVICES HOME NEEDED TO BE PLACED, AND IT WAS THAT THEY -- THE REQUEST WAS THAT HE BE PLACED WITH HIS SIBLINGS AT OUR CSS-APPROVED HOME.

MS. BARCLAY: JUST ONE MOMENT, YOUR HONOR.

PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 8. CAN YOU TELL US WHAT THIS DOCUMENT IS?

A. I DIDN'T HEAR YOU.

Q. CAN YOU TELL US WHAT THIS DOCUMENT IS?

A. IT'S AN E-MAIL FROM ME TO COMMISSIONER FIGUEROA, ADVISING HER THAT THE REFERRAL WAS MADE FOR [redacted]

[redacted] TO BE PLACED IN A CSS FOSTER HOME THAT NOW HAS HIS SIBLINGS.

MR. FIELD: OBJECTION. YOUR HONOR, THEY ARE TALKING ABOUT THE NAME OF THE CHILDREN WHO ARE IN THE CITY'S FOSTER-CARE. I'D ASK THAT THE EXHIBIT BE WITHDRAWN FROM THE RECORD.

THE COURT: WE WILL REDACT IT.

MR. FIELD: AND STRICKEN.

MS. BARCLAY: NO OBJECTION, YOUR HONOR?

BY MS. BARCLAY:

Q. TO THE EXTENT YOU ARE DESCRIBING THIS CHILD, WOULD YOU REFER TO THE CHILD AS DOE FOSTER CHILD NUMBER 2?

A. I WILL.

Q. WILL YOU DESCRIBE AGAIN WHAT THIS DOCUMENT IS?

A. AN E-MAIL TO THE COMMISSIONER INDICATING THAT IT RECEIVED A NET CUA REFERRAL ON DOE CHILD 2 TO BE REUNITED WITH HIS SIBLINGS WHO ARE IN A CSS FOSTER HOME AND THAT DOE CHILD 2 NEEDED AN EMERGENCY PLACEMENT, WITH MY UNDERSTANDING. I INDICATED THAT WE ACCEPTED THE REFERRAL AS -- WITH THE IDEA THAT IT'S IN THE BEST INTEREST OF THE CHILD TO BE WITH HIS SIBLINGS AND ASKED IF SHE HAD ANY QUESTIONS.

Q. NOW, A FEW DAYS LATER IN MARCH, THERE WAS ANOTHER E-MAIL FROM COMMISSIONER ALI. WERE YOU A

RECIPIENT OF THAT E-MAIL?
A. I WAS.
Q. WHAT DID YOU UNDERSTAND TO BE THE MEANING OF THAT E-MAIL?
A. MY UNDERSTANDING WAS IT WAS A CLEAR AND CONCISE AND DIRECT ORDER TO ALL OF THE CUA'S TO CEASE AND DESIST ANY REFERRALS TO CATHOLIC OR BETHANY.
Q. NOW WHO MADE THIS REFERRAL FOR DOE FOSTER CHILD NUMBER 2 TO CATHOLIC SOCIAL SERVICES?
A. MY UNDERSTANDING IS THE INQUIRY WAS MADE BY THE NET OR NORTHEAST TREATMENT CUA TO US, AND THAT THE NECESSARY -- AND THIS IS SPECULATION -- AND THAT THE CENTRAL REFERRAL UNIT OF THE CITY APPROVED OF THIS PLACEMENT.
Q. I JUST WANT TO MAKE SURE SOMETHING THAT YOU SAID EARLIER. YOU TALKED ABOUT THE REASON FOR THE REFERRAL FREEZE AND WHAT CATHOLIC SOCIAL SERVICES' RELIGIOUS OBJECTIONS WERE, RIGHT? DOES CATHOLIC SOCIAL SERVICES PLACE CHILDREN WITH INDIVIDUALS AND PROVIDE HOME STUDY FOR JUST SINGLE PARENT?
A. FOR ANY FAMILY WHO APPROACHES US FOR --
Q. FOR A SINGLE PARENT, COULD THEY HAVE A HOME STUDY PERFORMED?
A. YES.
Q. DOES IT MATTER WHAT THE SEXUAL ORIENTATION IS OF

A SINGLE INDIVIDUAL?

A. A SEXUAL ORIENTATION OF THE INDIVIDUAL IS NOT THE PART AND PARCEL OF WHAT THE HOME STUDY PROCESS IS ABOUT.

Q. SO AN INDIVIDUAL SINGLE GAY PERSON COULD BE A FOSTER PARENT WITH CATHOLIC SOCIAL SERVICES?

A. YES.

Q. IS THE OBJECTION ONLY WHEN CATHOLIC SOCIAL SERVICES IS BEING REQUIRED TO EVALUATE AND PROVIDE WRITTEN ENDORSEMENTS OF A SAME-SEX RELATIONSHIP?

A. YES, IT IS.

THE COURT: WRITTEN ENDORSEMENTS?

BY MS. BARCLAY:

Q. DO YOU VIEW THE HOME STUDY AND WHAT CULMINATES AT THE END OF THE HOME STUDY AS A WRITTEN ENDORSEMENT AS A RELATIONSHIP TO THE GOVERNMENT?

A. I THINK SO, YES.

Q. WHY DID YOU FILE THIS LAWSUIT? WAS THIS YOUR FIRST PREFERENCE?

A. NO. OUR FIRST PREFERENCE WAS TO WORK OUT A REASONABLE ACCOMMODATION WITH THE CITY. BUT UPON HEARING THAT SUBPOENAS WERE SOON TO BE ISSUED, AN INQUIRY COMING FROM THE PHILADELPHIA COMMISSION FOR HUMAN RELATIONS, IT SEEMED LIKE OUR ONLY RECOURSE WAS TO GO THIS ROUTE.

Q. WELL, WHAT WERE SOME OF THE THINGS THAT YOU DID BEFORE FILING THE LAWSUIT TO SEE IF YOU COULD WORK THIS OUT, AS YOU SAID?

A. WELL, WE SHOWED AN INTEREST IN FINDING SOME KIND OF MIDDLE GROUND. WE WORKED WITH BECKET TO SHOW THAT INTEREST, AND THERE WAS AN E-MAIL TO THE CITY INDICATING THAT WE WOULD LIKE TO HAVE A MEETING TO SEE IF SOME SORT OF ACCOMMODATION COULD BE WORKED OUT, BUT THE ANSWER WAS CLEAR AND CRISP. AND THE ANSWER WAS NO, THERE IS NO REASON FOR A MEETING, EITHER DO THE HOME STUDIES OR WE WILL BE TRANSITIONING YOU GRADUALLY OUT OF FOSTER-CARE.

Q. DID YOU ASK FOR MULTIPLE MEETINGS WITH DHS?

A. NO.

Q. DID YOU ASK ON MORE THAN ONE OCCASION FOR MEETINGS WITH DHS?

A. NOT TO MY RECOLLECTION.

Q. YOU DON'T RECALL?

A. NO, I DON'T RECALL THAT.

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING WITH YOU WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 9. DO YOU RECOGNIZE THIS DOCUMENT, MR. AMATO?

A. I DO.
Q. WHAT IS THE DATE OF THIS DOCUMENT?
A. MAY 7, 2018.
Q. WAS THERE SOMETHING ABOUT THIS DOCUMENT IN PARTICULAR THAT MADE YOU DECIDE THAT CATHOLIC SOCIAL SERVICES WOULD NEED TO FILE A LAWSUIT?
A. WELL, WHAT I RECALL OF THIS DOCUMENT IS SOMEWHERE IN THE -- IN THE DOCUMENT IS MR. RIENZI ASKING THE CITY FOR A MEETING TO SEE IF WE CAN COME UP WITH A SOLUTION, AND -- IF I AM RECALLING THIS AS THE CORRECT LETTER.
Q. LET ME PAUSE YOU THERE. THIS DOCUMENT IS NOT WRITTEN BY MR. RIENZI. IT'S WRITTEN TO MR. RIENZI BY THE CITY OF PHILADELPHIA. DO YOU RECALL ANY DISCUSSION IN THIS LETTER ABOUT SUBPOENAS?
A. ABOUT WHAT?
Q. SUBPOENAS FROM THE CITY.
A. WHAT I RECALL FROM THIS LETTER IS, IT WAS -- IT WAS A RESPONSE TO MR. RIENZI'S CALL FOR A MEETING TO COME UP WITH AN ALTERNATE SOLUTION, AND THE LETTER INDICATED THAT THERE IS NO SOLUTION THAT CAN BE HAD OTHER THAN COMPLETE THE HOME STUDIES AS WE HAVE MANDATED OR SUBPOENAS WILL BE FORTHCOMING. SO AT THAT POINT, OUR BEST RECOURSE AND ONLY RECOURSE WAS A FEDERAL LAWSUIT.
Q. I WANT TO DIRECT YOUR ATTENTION TO THE LAST

SENTENCE OF THIS LETTER BEFORE THE SIGNATURE. IT SAYS: THEREFORE WE REITERATE THE REQUEST FOR INFORMATION SET FORTH IN THAT LETTER AND WE ASK YOU TO RESPOND WITHIN TEN DAYS OF THIS LETTER TO AVOID THE ISSUANCE OF A SUBPOENA.

DID I READ THAT CORRECTLY?

A. YES.

Q. SO HOW LONG AFTER MAY 7 WAS IT APPROXIMATELY THAT YOU FILED YOUR LAWSUIT?

A. MY RECOLLECTION IS ABOUT NINE DAYS LATER.

Q. NOW, THE ATTORNEYS FOR THE CITY HAVE ACCUSED YOU OF NEEDLESSLY MAKING --

MR. FIELD: OBJECTION, YOUR HONOR.

THE COURT: TO THE TERM "ACCUSE."

MS. BARCLAY: YES, YOUR HONOR.

BY MS. BARCLAY:

Q. MR. AMATO, LET ME REPHRASE MY QUESTION. THE ATTORNEYS FOR THE CITY HAVE STATED THAT YOU NEEDLESSLY MADE THE DOE FOSTER CHILD NUMBER 1 SITUATION PART OF THIS LAWSUIT, THAT YOU ENTANGLED IT IN THIS LAWSUIT. WHY DID YOU DECIDE --

MR. FIELD: OBJECTION, YOUR HONOR. THIS LETTER IS NOT FROM AN ATTORNEY FOR THE CITY.

MS. BARCLAY: YOUR HONOR, I AM NO LONGER TALKING ABOUT THE LETTER.

THE COURT: ASK YOUR QUESTION AGAIN, PLEASE.

BY MS. BARCLAY:

Q. THE ATTORNEYS FOR THE CITY HAVE ACCUSED YOU OF NEEDLESSLY MAKING DOE FOSTER CHILD NUMBER 1 SITUATION PART OF THIS LAWSUIT AND ENTANGLING THAT WITH THIS LAWSUIT. WHY DID YOU DECIDE THAT ADDITIONAL FACTS RELEVANT TO THE DOE FOSTER CHILD NUMBER 1 SITUATION NEEDED TO BE COMMUNICATED TO THE CITY THROUGH YOUR ATTORNEYS AND THIS LITIGATION?

MR. FIELD: YOUR HONOR, I OBJECT TO THE CHARACTERIZATION OF THE CITY'S REPRESENTATION. THOSE WORDS CHANGE BETWEEN LITIGATION COUNSEL AND THIS LITIGATION.

MS. BARCLAY: YOUR HONOR, MAY I PULL OUT THE CHARACTERIZATION OF THE BRIEF?

THE COURT: WELL, AGAIN, JUST ASK THE SIMPLE QUESTION.

MS. BARCLAY: YES, YOUR HONOR.

BY MS. BARCLAY:

Q. WHY DID YOU DECIDE THAT THE ADDITIONAL FACTS YOU LEARNED ABOUT THE DOE FOSTER CHILD NUMBER 1 SITUATION NEEDED TO BE COMMUNICATED THROUGH LITIGATION COUNSEL TO THE CITY?

A. BECAUSE ON MAY 25TH WHEN IT WAS DISCOVERED BY OUR CUA WORKER THAT DOE CHILD NUMBER 2 NEEDED AN EMERGENCY PLACEMENT AND OUR -- HIS PREVIOUS FOSTER HOME

WAS OFFERED AS AN EMERGENCY PLACEMENT, THE ANSWER FROM THE LINE WORKER AFTER CHECKING WITH HIS SUPERVISORS WAS THAT THE -- THE REFERRAL WOULD NOT BE ALLOWED BECAUSE OF THE CASE AGAINST THE CATHOLIC SOCIAL SERVICES.

Q. AND WHEN YOU TALKED ABOUT THE LINE WORKER, YOU ARE REFERRING TO A DHS WORKER, CORRECT?

A. YES, AND THE CUA.

Q. WHAT DOES THAT INDICATE TO YOU ABOUT THAT DENIAL AND WHY COMMUNICATIONS NEEDED TO BE PART OF THIS LITIGATION?

A. WELL, THEY TIED THE DENIAL TO THE CASE AGAINST CATHOLIC SOCIAL SERVICES.

MR. FIELD: OBJECTION, YOUR HONOR, THIS IS HEARSAY.

MS. BARCLAY: YOUR HONOR, THIS IS NOT BEING OFFERED FOR THE TRUTH OF THE MATTER ASSERTED, BUT BECAUSE THE CATHOLIC SOCIAL SERVICES' MOTIVES FOR BRINGING UP THE DOE FOSTER CHILD NUMBER 1 SITUATION HAS BEEN CALLED IN QUESTION, THIS IS RELEVANT TO ADDRESS WHAT HIS MOTIVES WERE AS FAR AS THOSE COMMUNICATIONS.

THE COURT: OVERRULED. YOU STARTED TO ANSWER.

BY MS. BARCLAY:

Q. YOU CAN START AGAIN, MR. AMATO. WHAT -- DO YOU NEED ME TO REPEAT THE QUESTION?

A. PLEASE.

Q. SO WHAT DID THAT DENIAL BY DHS INDICATE TO YOU AS FAR AS WHY THOSE COMMUNICATIONS NEEDED TO BE MADE AS PART OF THIS LITIGATION?

A. THE DENIAL INDICATED TO ME THAT THE SOLE REASON FOR THE LACK OF WHAT WAS A VERY SOLID PLAN FOR DOE NUMBER 1 CHILD WAS NEGATED BECAUSE OF THE CASE AGAINST CATHOLIC SOCIAL SERVICES AND THE FREEZE ON ADMISSION. SO I THOUGHT IT IMPERATIVE TO TAKE THIS THROUGH LEGAL COUNSEL BECAUSE IT WAS CLEAR TO ME THAT IT WAS IN THE BEST INTERESTS OF THE CHILD TO BE REUNITED WITH HIS CSS FOSTER MOTHER.

MS. BARCLAY: JUST A MOMENT, MR. AMATO.

PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

MS. BARCLAY: AND FOR CLARITY I AM GOING TO APPROACH THE WITNESS WITH BOTH THE REDACTED AND UNREDACTED VERSION OF THE DOCUMENT.

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBITS 10 AND 11. MR. AMATO, I AM GOING TO READ TO YOU A REDACTED VERSION. IT SAYS ABOUT THE 4TH PARAGRAPH DOWN: DHS TOLD THE CUA

WORKER NO SINCE DHS IS REFUSING TO SEND REFERRALS TO CSS. SO IS THIS THE DENIAL THAT YOU ARE REFERRING TO THAT LED YOU TO ARRIVE AT THIS CONCLUSION?

A. YES, IT IS.

Q. WHY DIDN'T YOU ROUTE THIS ISSUE THROUGH THE NORMAL FAMILY COURT PROCESS?

A. BECAUSE OF THE COMPLEXITY OF THE ACTION TAKEN AGAINST CATHOLIC SOCIAL SERVICES, BECAUSE OF THE URGENT NEEDS OF THE CHILD TO BE SERVED, I THOUGHT THAT THIS MATTER WAS OUTSIDE THE REALM OF WHAT FAMILY COURTS TRADITIONALLY HANDLES.

Q. DID YOU THINK THAT THERE WERE ANY EXCEPTIONAL CIRCUMSTANCES AT ISSUE HERE?

A. ABSOLUTELY. WE HAVE A VERY YOUNG CHILD [redacted] WHO WAS MOVED FROM RESPITE HOME TO RESPITE HOME, [redacted]

MR. FIELD: YOUR HONOR, I OBJECT TO PUTTING DETAILS ABOUT THE FOSTER CHILD IN THE CITY'S CARE IN THE RECORD.

BY MS. BARCLAY:

Q. IF YOU CAN LIMIT YOUR RESPONSE, MR. AMATO, TO THE LIMITED THINGS WITHOUT GOING INTO DETAIL THAT WERE THE EXCEPTIONAL CIRCUMSTANCES THAT YOU THOUGHT WARRANTED NOT ROUTING THIS THROUGH NORMAL FAMILY COURT PROCESS.

MR. FIELD: YOUR HONOR, IF I CAN ASK THAT THE MEDICAL DETAILS BE STRICKEN.

THE COURT: YES, THEY WILL BE STRICKEN.

THE WITNESS: THEN IT -- ABSENT THAT, IT WAS THE FACT THAT HE WAS IN A RESPITE FOR TWO DAYS, FOR A WEEKEND, AND HE WAS GOING TO GET MOVED TO ANOTHER RESPITE HOME. AND DURING THAT SAME TIME, IT WAS CLEAR TO MANY INDIVIDUALS THAT HIS CSS FOSTER MOTHER WELCOMED HIM BACK. AND LATER ON IN THE WEEK, WE FOUND OUT HAD ALSO SPOKEN TO HER FAMILY AND HAD BEEN -- IT WAS DEVELOPED THAT HAD BEEN FAVORABLE TO ENACTING AN ADOPTION PLAN FOR --

BY MS. BARCLAY:

Q. WAS THERE ANYTHING IN PARTICULAR THAT YOU THOUGHT WAS EXCEPTIONAL ON MAY 25TH ABOUT THE OPTIONS THAT WERE AVAILABLE AT THAT TIME AND THE DENIAL OF THAT FOSTER MOTHER?

A. I THOUGHT IT WAS PARTICULARLY RELEVANT IN THESE SITUATIONS. THE OPTIONS, GRIMLY, ARE NOT MUCH, AND IT WOULD HAVE BEEN AN OVERNIGHT IN THE DHS CHILDCARE ROOM, AN EMERGENCY SHELTER, OR WHAT WE HAD OFFERED WITH THE CSS FOSTER HOME. SO THAT OPTION WAS JUST A FAR BETTER OPTION.

Q. AND IN YOUR NORMAL EXPERIENCE WITH PLACEMENT, WOULD A FORMER FOSTER MOTHER EVER BE DENIED IN THE BEST INTEREST OF A CHILD?

A. NEVER, PARTICULARLY WHEN THE FOSTER MOTHER IS IN SUCH GOOD STANDING AS THIS FOSTER MOTHER IS.

Q. DO YOU RECALL WHEN YOUR ATTORNEYS FIRST COMMUNICATED WITH DHS ABOUT THOSE ADDITIONAL FACTS?

A. I BELIEVE EARLY IN THE FOLLOWING WEEK OUR ATTORNEYS COMMUNICATED WITH DHS, INDICATING CLEARLY THE POSITION OF OUR FOSTER MOTHER AND THE WELCOME NEWS OF HER INTENT AND INTEREST IN ADOPTING DOE 2.

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 12. THIS IS AN E-MAIL FROM LORI WINDHAM TO MR. FIELD. AND SHE SAYS: BEN, THANKS FOR YOUR E-MAIL. WE WILL TAKE A LOOK AT THE SOURCES YOU PROVIDED -- PROPOSED REDACTIONS. IN THE MEANTIME, THOUGH, WE STILL HAVE A CHILD STUCK IN RESPITE CARE AND KEPT FROM A PRE-ADOPTIVE HOME. I STATED ON MONDAY I WOULD FACILITATE THE NECESSARY CONVERSATIONS WITH MY CLIENTS, AND I RECEIVED NO OUTREACH REGARDING THAT. WHEN WILL THE CITY BE ACTING ON THIS MATTER?

SO MY QUESTION TO YOU IS PRIOR TO RECEIVING -- PRIOR TO SENDING THIS E-MAIL, WERE YOU AWARE OF THE CITY TRYING TO MAKE OUTREACH TO COMMUNICATE

WITH YOU ABOUT THIS PARTICULAR SITUATION?

MR. FIELD: YOUR HONOR, I OBJECT. THE WITNESS DID NOT SEND THIS E-MAIL OR WASN'T INVOLVED IN THIS COMMUNICATION.

BY MS. BARCLAY:

Q. WAS THIS E-MAIL SENT AT YOUR DIRECTION, MR. AMATO?

A. YES.

Q. SO PRIOR TO THIS E-MAIL BEING SENT, WERE YOU AWARE OF THE CITY TRYING TO REACH OUT TO YOU TO ARRANGE -- CONVERSATIONS WITH YOU ABOUT THIS CHILD?

A. NO.

THE COURT: COUNSEL, I AM GOING TO INTERRUPT YOU AT THIS POINT AND ASK YOU WHAT IS THE RELEVANCE OF ALL OF THIS, AS IT RELATES TO THE REQUEST FOR THE INJUNCTION?

MS. BARCLAY: WELL, THE RELEVANCE FOR ALL OF THIS IS TO RESPOND TO SOME OF THE ARGUMENTS THAT THE CITY HAS MADE, NUMBER ONE, THAT THE INTENT OF CATHOLIC SOCIAL SERVICES WAS UNFOUNDED AS FAR AS THEIR NEED TO INVOLVE THE DOE SITUATION AS PART OF THIS LAWSUIT AND COMMUNICATE ABOUT THE DOE SITUATION AS PART OF THIS LAWSUIT AND THEY WERE BEING DILATORY IN THEIR COMMUNICATION ABOUT THAT SITUATION.

THE COURT: I DON'T KNOW THAT IT WILL IMPACT THIS COURT'S DECISION AS TO WHETHER OR NOT AN INJUNCTION IS APPROPRIATE.

MS. BARCLAY: THERE IS ALSO CERTAINLY THE QUESTION AS FAR AS THE ABILITY OF THIS SITUATION TO REPEAT IN THE FUTURE AS LONG AS THIS REFERRAL FREEZE IS IN PLACE, AND AS MR. AMATO HAS TESTIFIED, THERE IS NO CLEAR INSTRUCTION TO DHS WORKERS OR TO CUA LEADERSHIP TO ENSURE THESE SORT OF REFERRALS ARE SENT TO CATHOLIC SOCIAL SERVICES, YOUR HONOR.

THE COURT: I DON'T KNOW THAT THIS GENTLEMAN CAN TESTIFY. HE CAN TESTIFY AS TO WHAT HAPPENED, AND YOU CAN MAKE THE ARGUMENT THAT IT MAY HAPPEN IN THE FUTURE OR YOU DON'T WANT IT TO HAPPEN IN THE FUTURE. BUT I DON'T KNOW THAT WE HAVE TO GO THROUGH THE WHOLE HISTORY OF HIS COMMUNICATION IN REGARD TO THIS ONE YOUNG BOY.

MS. BARCLAY: THE COMMUNICATION -- SO COUNSEL FOR THE CITY HAS OFFERED COMMUNICATION WITH THE ATTORNEYS IN THEIR OWN EXHIBITS, YOUR HONOR, AND WE ARE PROVIDING THE COMPLETE STORY ABOUT THE NARRATIVE THAT THEY HAVE MADE AT ISSUE IN THEIR BRIEFING, AND THAT'S NUMBER ONE.

AND NUMBER TWO, MR. AMATO IS ABLE TO TESTIFY ABOUT HIS CONCERN THAT THIS SORT OF SITUATION COULD REPEAT IN THE FUTURE BASED ON THE CURRENT POLICY AND THE CURRENT REFERRAL FREEZE.

THE COURT: HE ALREADY TESTIFIED TO THAT.

MS. BARCLAY: SO THAT'S HOW THIS IS RELEVANT, YOUR HONOR, AS FAR AS THE NEED TO GRANT THE TRO.

THE COURT: I DON'T THINK WE HAVE TO GO ANY FURTHER.

MS. BARCLAY: THIS IS THE END OF MY LINE OF QUESTIONING ON THAT.

BY MS. BARCLAY:

Q. MR. AMATO, I WOULD LIKE TO SPEAK TO YOU ABOUT THE VIABILITY OF THE CATHOLIC SOCIAL SERVICES FOSTER PROGRAM MOVING FORWARD. DO YOU REGULARLY OR DO YOUR STAFF REGULARLY REPORT FOSTER-CARE VACANCIES TO DHS?

A. YES.

Q. AND IS THAT A CONTRACT REQUIREMENT, AS FAR AS YOU ARE AWARE?

A. I THINK IT'S A PERFORMANCE EXPECTATION. I DON'T THINK IT'S A CONTRACT REQUIREMENT.

Q. BEFORE THE REFERRAL FREEZE, ON AVERAGE HOW MANY VACANCIES WOULD CATHOLIC SOCIAL SERVICES HAVE AT ANY GIVEN PERIOD OF TIME ACROSS ALL OF THEIR PROGRAMS?

A. FOUR OR FIVE.

Q. HOW MANY VACANCIES DO YOU ANTICIPATE THAT YOU WILL HAVE BY THE END OF JUNE?

A. 35.

Q. IF YOU CONTINUE TO NOT RECEIVE REFERRALS, WHEN WILL YOU HAVE TO START LAYING OFF EMPLOYEES?

A. IN MID JULY WE WILL BEGIN A VERY SAD PROCESS OF STAFF REDUCTION.

Q. AND THAT'S IF YOU DO NOT CONTINUE TO RECEIVE REFERRALS?

A. CORRECT.

Q. AND ON AVERAGE, HOW MANY REFERRALS WILL CATHOLIC SOCIAL SERVICES RECEIVE A MONTH FROM DHS FOR FOSTER CHILDREN?

A. NINE.

Q. IS IT YOUR EXPERIENCE THAT AFTER A CONTRACT EXPIRED WITH DHS THAT FOSTER AGENCIES ARE ABLE TO CONTINUE OPERATING UNDER THE PRIOR CONTRACT?

A. CAN YOU REPEAT THAT QUESTION, PLEASE.

Q. LET'S TALK, FOR EXAMPLE, IF THERE WAS NO REFERRAL FREEZE GOING ON AND THIS CONTRACT WITH CATHOLIC SOCIAL SERVICES HAS A TERM ENDING JUNE 30TH. IN A TYPICAL SENSE, DOES THAT MEAN THAT RIGHT AT JUNE 30TH YOU HAVE TO ENTER INTO ANOTHER CONTRACT, OR IS IT TYPICAL FOR AN AGENCY TO OPERATE UNDER AN EXISTING CONTRACT?

A. IT'S TYPICAL --

MR. FIELD: OBJECTION. SPECULATION, YOUR HONOR.

THE COURT: OVERRULED.

BY MS. BARCLAY:

Q. YOU CAN ANSWER THE QUESTION.

A. IT'S TYPICAL THAT WE OPERATE UNDER AN EXISTING

CONTRACT. MANY OF OUR -- MANY YEARS OF CONTRACT WITH THE CITY ARE NOT CONFORMED UNTIL WELL INTO THE FALL.

Q. SO FOR AN AMOUNT OF MONTHS YOU CAN JUST KEEP OPERATING UNDER THE PREVIOUS CONTRACT?

A. YES.

Q. HOW MANY TOTAL STAFF RIGHT NOW WORK FOR THIS PROGRAM?

A. 15.

Q. IF REFERRALS DO NOT CONTINUE, APPROXIMATELY HOW LONG WILL IT BE UNTIL THE PROGRAM IS COMPLETELY CLOSED DOWN?

A. IN A MATTER OF MONTHS.

Q. IF YOU CLOSE THE PROGRAM, HOW EASY WOULD IT BE TO LATER COME BACK AND RECRUIT THE SAME TYPE OF STAFF?

A. IMPOSSIBLE.

MR. FIELD: CALLS FOR SPECULATION.

THE COURT: YES, SUSTAINED.

BY MS. BARCLAY:

Q. IS ONE OF THE HALLMARKS OF OUR PROGRAM THE CONTINUITY OF THE EXISTING STAFF?

MR. FIELD: ASKED AND ANSWERED, YOUR HONOR.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. WOULD ONE OF THE HALLMARKS OF YOUR CURRENT PROGRAM BE GONE IF YOU LATER REBUILD THAT WITHOUT YOUR

GREAT STAFF?

MR. FIELD: OBJECTION, CALLS FOR SPECULATION, YOUR HONOR.

MS. BARCLAY: THAT'S NOT SPECULATIVE, YOUR HONOR. IF THE CURRENT STAFF WERE GONE, WOULD THAT BE RELEVANT TO WHETHER OR NOT THAT STRENGTH OF CATHOLIC SOCIAL SERVICES WOULD BE AVAILABLE. AND THAT'S RELEVANT TO THE HARM INQUIRY FOR A PRELIMINARY INJUNCTION --

THE COURT: OVERRULED.

MS. BARCLAY: -- RESTRAINING ORDER.

BY MS. BARCLAY:

Q. WOULD THAT HALLMARK OF YOUR PROGRAM BE GONE, CONTINUITY OF THE STAFF?

A. ABSOLUTELY.

Q. IF YOU CLOSED YOUR PROGRAM, HOW EASY DO YOU THINK IT WOULD BE TO REBUILD NETWORKS WITH FAMILY AND THE RELATIONSHIP OF TRUST THAT YOU HAVE RIGHT NOW?

A. IT WOULD TAKE YEARS.

MS. BARCLAY: NO FURTHER QUESTIONS, MR. AMATO.

YOUR HONOR, I WOULD LIKE TO MAKE SURE THAT I FORMALLY MOVE ALL EXHIBITS INTO EVIDENCE THAT WE HAVE DISCUSSED DURING THIS TESTIMONY.

THE COURT: VERY WELL.

MS. BARCLAY: THANK YOU.

MR. FIELD: YOUR HONOR, BEFORE I BEGIN, I WOULD JUST LIKE TO CLARIFY ONE POINT. COUNSEL REFERRED TO MOVING ALL EXHIBITS INTO EVIDENCE. I'D JUST LIKE TO CLARIFY THAT THAT'S THE EXHIBITS INTRODUCED TO THE WITNESS AND NOT AFFIDAVITS AND OTHER EXHIBITS THAT SHE DISCUSSED IN THE PARTIES' FILINGS.

THE COURT: YES. IT'S P-1 THROUGH 13 -- NO, 12.

MR. FIELD: THANK YOU, YOUR HONOR.

(PLAINTIFF EXHIBITS 1 THROUGH 12 ADMITTED INTO EVIDENCE.)

CROSS-EXAMINATION

BY MR. FIELD:

Q. MR. AMATO, THANK YOU FOR BEING HERE TODAY. WOULD YOU LIKE ME TO CALL YOU MR. AMATO?

A. JIM WOULD BE FINE.

Q. JIM WOULD BE FINE. THANK YOU.

YOU MOVED THROUGH A LOT OF TERRITORY. WE ARE GOING TO MOVE THROUGH A FAIR AMOUNT OF TERRITORY. I WANT TO START ON A FAIRLY DISCRETE POINT, WHICH IS DOE FOSTER CHILD NUMBER 1, AS WE HAVE CALLED HIM, THE LAWYERS HAVE CALLED HIM IN THIS LITIGATION, WHO IS A CHILD WHO IS THE SUBJECT OF A MAY 25TH COMMUNICATION AND THEN I BELIEVE AN E-MAIL THAT YOUR COUNSEL SHOWED YOU ON THIS.

WHEN DID YOU FIRST BECOME AWARE OF ISSUES WITH DOE FOSTER CHILD NUMBER 1'S PLACEMENT?

A. EARLY IN THE FOLLOWING WEEK, SO IT WOULD PROBABLY BE THE WEEK OF MAY 28, I THINK.

Q. SO YOU WERE NOT AWARE OF THAT ON MAY 25?

A. NO.

Q. AND WERE YOU INVOLVED IN ANY OF THE COMMUNICATIONS ON MAY 25?

A. NO.

Q. AND HOW DID YOU LEARN ABOUT THOSE COMMUNICATIONS?

A. BECAUSE MR. BLACK REPORTS DIRECTLY TO ME, AND MR. BLACK WAS HAVING THOSE CONVERSATIONS, TEXTS, AND PHONE CALLS WITH DEPUTY COMMISSIONER ALI.

Q. AND WHAT DID MR. BLACK TELL YOU?

A. MR. BLACK INDICATED THAT THE -- THAT OUR CUA WORKER, CATHOLIC SOCIAL SERVICES CUA WORKER, ON THE NIGHT OF MAY 25 HAD CONTACTED OUR CSS FOSTER MOTHER WHO WAS VERY WILLING TO TAKE DOE CHILD 1 BACK AND -- INTO HER HOME AND THAT THE -- AND THAT THE CITY CUA RESPONSE WAS THAT THAT WOULD NOT BE PERMITTED DUE TO THE CASE AGAINST CATHOLIC SOCIAL SERVICES.

Q. AND WHEN, TO THE BEST OF YOUR RECOLLECTION, DID HE TELL YOU THIS?

A. HE TOLD ME THAT ON MONDAY, THE FOLLOWING MONDAY.

Q. JIM, I WOULD LIKE YOU TO REFER TO AN EXHIBIT THAT HAS BEEN INTRODUCED IN AN UNREDACTED AND REDACTED FORM, EXHIBITS 10 AND 11 IN FRONT OF YOU. AND THIS IS AN E-MAIL FROM TABITHA SEEHOUSEN TO JERNARD WHITMAN AND ROBERT MONTORO REGARDING DOE FOSTER CHILD NUMBER 1, DATED JUNE 1ST, 2018. IS THAT CORRECT?

A. CORRECT.

Q. WHO IS MS. SEEHOUSEN?

A. SHE IS A FOSTER-CARE CASE MANAGER EMPLOYED BY CATHOLIC SOCIAL SERVICES.

Q. AND LET'S DIGRESS FOR A MOMENT, JUST SO I UNDERSTAND. YOU SAID EARLIER THAT YOU OVERSEE CATHOLIC SOCIAL SERVICES IN YOUR POSITION, CORRECT?

A. YES.

Q. AND WHO DO YOU REPORT TO? WHO IS ABOVE YOU AND WHAT IS THE STRUCTURE THERE?

A. I REPORT TO BISHOP JOHN MCINTYRE WHO IS THE PRESIDENT OF OUR BOARDS.

Q. AND IS THERE AN OVERSIGHT STRUCTURE ABOVE BISHOP JOHN MCINTYRE?

A. HE REPORTS IN THE ARCHBISHOP.

Q. AND WITHIN CATHOLIC SOCIAL SERVICES, YOU TALKED ABOUT THE DIFFERENT FOSTER-CARE SERVICES IT OFFERS. I BELIEVE YOU TALKED ABOUT A CUA, WHAT I BELIEVE IS CALLED CONGREGATE CARE, RIGHT?

A. YES.
Q. AND IN-HOME FOSTER-CARE PLACEMENT?
A. CLOSE ENOUGH, YEAH.
Q. AND DO THE STAFF OF CATHOLIC SOCIAL SERVICES WORK ACROSS ALL OF THOSE ACTIVITIES, OR ARE THEY SILOED WITHIN ACTIVITIES?
A. SILOED IN INDIVIDUAL PROGRAM ACTIVITIES.
Q. WHICH PROGRAM ACTIVITY DOES TABITHA SEEHOUSEN WORK IN?
A. CATHOLIC SOCIAL SERVICES FOSTER-CARE DEPARTMENT.
Q. AND WHO IS MR. WHITMAN?
A. HE IS THE CATHOLIC COMMUNITY SERVICES CUA CASE MANAGER.
Q. AND WHO IS MR. MONTORO?
A. HE IS THE ADMINISTRATOR OF CATHOLIC SOCIAL SERVICES FOSTER-CARE DEPARTMENT.
Q. SO IS THIS -- AM I UNDERSTANDING THIS E-MAIL CORRECTLY THAT IT'S NOW THE FOSTER-CARE SERVICES COMMUNICATING INFORMATION ABOUT THIS CASE TO THE CUA?
A. CORRECT.
Q. AND DID MR. BLACK HAVE THIS INFORMATION BEFORE JUNE 1ST?
A. YES.
Q. OKAY. HE RELATED THAT INFORMATION TO YOU AT THE START OF THAT WEEK?

A. YES, TO THE BEST OF MY RECOLLECTION.

Q. YOU ARE PRESENTLY AWARE, AREN'T YOU, THAT DHS WILL GRANT EXCEPTIONS IN SOME CASES FOR PLACEMENTS WITH CATHOLIC SOCIAL SERVICES?

A. I ONLY BECAME AWARE OF THAT BECAUSE I ASKED.

Q. AND TO THE BEST OF YOUR RECOLLECTION, WHEN DID YOU ASK?

A. I ASKED IN LATE MARCH FOR THE EXCEPTION FOR DOE CHILD NUMBER -- THESE NUMBERS -- WAS THAT 1 -- 2. OKAY.

Q. AND SO YOU HAVE BEEN AWARE SINCE LATE MARCH THAT DHS WOULD GRANT EXCEPTIONS?

A. I WAS ONLY AWARE OF ONE EXCEPTION, FOR DOE CHILD NUMBER 2.

Q. YOU ARE AWARE THAT DHS WOULD GRANT EXCEPTIONS IN CERTAIN CASES WHEN APPROPRIATE?

A. I WAS AWARE THERE WAS AN EXCEPTION FOR DOE CHILD NUMBER 2.

Q. IS YOUR ANSWER NO TO MY QUESTION?

MS. BARCLAY: OBJECTION, YOUR HONOR, ASKED AND ANSWERED.

THE COURT: HE HAS ANSWERED.

MR. FIELD: YOUR HONOR, PERMISSION TO APPROACH THE WITNESS.

THE COURT: YES.

BY MR. FIELD:

Q. MR. AMATO, I HAVE JUST HANDED YOU AN EXHIBIT MARKED DEFENDANT'S EXHIBIT NUMBER 1. IT'S AN E-MAIL FROM JAMES AMATO, DATED TUESDAY, MAY 1ST, TO CYNTHIA FIGUEROA. DO YOU RECALL WRITING THIS E-MAIL?

A. YES.

Q. AND I WILL NOTE FOR THE RECORD THAT A PORTION OF THE BODY OF THIS E-MAIL IS REDACTED. THAT PORTION --

MS. BARCLAY: OBJECTION, YOUR HONOR. MAY WE SEE -- ACTUALLY WE HAVE NEVER SEEN THIS DOCUMENT. MAY WE SEE AN UNREDACTED VERSION FOR COUNSEL'S CONTEXT?

THE COURT: YES.

MR. FIELD: WE HAVE NO PROBLEM WITH THAT, YOUR HONOR.

MS. BARCLAY: MAY MR. AMATO BE ALSO PROVIDED AN UNREDACTED VERSION FOR CLARITY?

THE COURT: DO YOU WANT TO REPEAT YOUR QUESTION.

BY MR. FIELD:

Q. MR. AMATO, I WANT TO DIRECT YOU TO THE PENULTIMATE LINE OF THAT E-MAIL THAT STARTS WITH: WE ARE PREPARED. WOULD YOU READ THAT, PLEASE?

A. WE ARE PREPARED TO ACCEPT BOTH CHILDREN BUT REALIZE THAT DHS SENIOR MANAGEMENT WOULD HAVE TO GIVE THE GREEN LIGHT TO CUA FRONT LINE STAFF.

Q. ISN'T THAT TRUE THAT YOU UNDERSTOOD THAT CSS

SENIOR MANAGEMENT COULD GIVE THE GREEN LIGHT TO CUA FRONT LINE STAFF TO PLACE CHILDREN WITH CSS AS OF MAY 1ST?

A. THAT LINE WAS BASED ON THE FACT THAT THERE WAS A FREEZE ON ANY OF OUR REFERRALS THAT ENDED -- I NEEDED TO CONTACT THE OMMISSIONER FOR APPROVAL FOR ANY CHILD REFERRED TO US.

Q. AND IS THAT WHY YOU WROTE THIS E-MAIL, TO SEEK APPROVAL FOR A REFERRAL?

A. I DID.

Q. THANK YOU.

DID YOU WRITE A SIMILAR E-MAIL TO THE COMMISSIONER REGARDING DOE FOSTER CHILD NUMBER 1?

A. NUMBER 1 IS THE MAY, YEAH.

Q. CORRECT, THE MAY 25 CHILD?

A. NO. MY COMMUNICATIONS WITH DOE CHILD NUMBER 1 WERE PHONE CALLS AND AN OCCASIONAL TEXT WITH DEPUTY COMMISSIONER ALI. AT ONE POINT IN ONE OF THE PHONE CALLS, THE COMMISSIONER WAS IN THE CAR WITH HER RETURNING FROM ALLENTOWN.

Q. DO YOU RECALL WHEN THOSE PHONE CALLS AND TEXTS WERE?

A. I RECALL IN THIS CONTEXT DOE CHILD NUMBER 2 RETURNED TO THE CSS FOSTER HOME ON JUNE 12. REMEMBER, THAT'S 17 DAYS AFTER MAY 25, AND THE URGENCY OF THIS

CHILD BEING SETTLED IN THE HOME WAS GROWING.

THE COURT: LET'S JUST ANSWER THE QUESTION.

THE WITNESS: OKAY. GIVE ME THE QUESTION AGAIN.

BY MR. FIELD:

Q. I WAS ASKING IF YOU RECALL WHEN THOSE PHONE CALLS WERE. AND JUST TO CLARIFY THE RECORD, YOU SAID FOSTER CHILD NUMBER 2. I BELIEVE WE ARE TALKING ABOUT FOSTER CHILD NUMBER 1, JUST SO IT'S CLEAR.

A. THE DOES ARE GETTING ME CONFUSED. THAT CONVERSATION WOULD HAVE BEEN SEVERAL DAYS PRIOR TO JUNE 12.

Q. SO SHORTLY -- IN BROAD TERMS, SHORTLY BEFORE THE CHILD WAS, AS YOU SAID, PLACED WITH A CSS HOUSEHOLD?

A. CORRECT.

Q. THANK YOU.

JIM, WHEN YOU WERE TALKING ABOUT THE VARIOUS PROGRAMS RELATED TO FOSTER CHILDREN THAT CATHOLIC SOCIAL SERVICES OPERATES, YOU REFERENCED THE FOSTER-CARE DEPARTMENT. YOU ALSO REFERENCED THE RESIDENTIAL SERVICES. APPROXIMATELY HOW MANY CHILDREN ARE SERVICED THROUGH THE RESIDENTIAL SERVICES PROGRAM?

A. 260 DAILY AT EITHER ST. GABRIEL'S HALL AND ST. FRANCIS. AND ANOTHER 85 CHILDREN SERVED AT DE LA SALLE VOCATIONAL, A DAY TREATMENT PROGRAM THAT IS IN THAT

CONTRACT DESPITE THE FACT THAT THE CHILDREN ARE LIVING AT HOME WITH THEIR FAMILIES. THESE ARE ALL KIDS ADJUDICATED DELINQUENT.

Q. AND YOU ALSO MENTIONED THE CUA, THE COMMUNITY UMBRELLA AGENCY?

A. CORRECT.

Q. HOW MANY CHILDREN ARE SERVICED THROUGH THE COMMUNITY UMBRELLA AGENCY?

A. I GET A REGULAR REPORT. MY LAST RECOLLECTION IS ABOUT 800.

Q. HOW MANY OF CATHOLIC SOCIAL SERVICES EMPLOYEES ARE EMPLOYED BY THE COMMUNITY UMBRELLA AGENCY OR THEIR AGREEMENT IS WITH REFERENCE TO THE COMMUNITY UMBRELLA AGENCY?

A. APPROXIMATELY 50 TO 60.

Q. DOES THAT INCLUDE CASE WORKERS?

A. THAT INCLUDES ALL STAFF EMPLOYED BY THE --

Q. WHAT TYPES OF STAFF WOULD THAT BE?

A. FROM SECRETARIES AND SUPPORT STAFF ON THE CASE, MANAGERS, SUPERVISORS, CASE MANAGEMENT DIRECTORS, AND SENIOR MANAGEMENT.

Q. AND YOU MENTIONED THAT THERE WERE 1500 KIDS LAST YEAR THROUGH ALL ACROSS CATHOLIC SOCIAL SERVICES?

A. YES.

Q. DOES CATHOLIC SOCIAL SERVICES WORK WITH ANY

OTHER COUNTY OTHER THAN PHILADELPHIA IN THE FIVE-COUNTY AREA?

A. WE HAVE CONTRACTS, BUT VERY FEW REFERRALS WITH THE MONTGOMERY/BUCKS.

Q. YOU HAVE CONTRACTS WITH MONTGOMERY AND BUCKS COUNTY?

A. YES.

Q. DO THOSE CONTRACTS INCLUDE FOSTER-CARE?

A. YES.

Q. SO I WOULD LIKE TO TURN TO THE DISCUSSION OF -- I UNDERSTAND TO BE THE CORE ISSUES OF THIS CASE, WHICH IS CATHOLIC SOCIAL SERVICES' REFUSAL TO CERTIFY SAME-SEX COUPLES FOR FOSTER-CARE. YOU SAID IN YOUR TESTIMONY, AND I APOLOGIZE, I WANT TO GET YOUR WORDS RIGHT, TO THE EXTENT I WROTE THEM DOWN CORRECTLY -- SO BEAR WITH ME A MOMENT -- THAT YOU WOULD NOT DO IT, AND "IT" I TAKE IT YOU MEANT CSS WOULD NOT CERTIFY SAME-SEX RESOURCE PARENTS, I THINK THEY ARE CALLED --

MS. BARCLAY: OBJECTION, SPECULATION.

THE COURT: OVERRULED.

MR. FIELD: I AM JUST TRYING TO MAKE SURE I GOT HIS WORDS CORRECT, YOUR HONOR.

BY MR. FIELD:

Q. YOU SAID IT WAS AGAINST THE TEACHING OF THE CATHOLIC CHURCH, IS THAT CORRECT?

A. CAN YOU REPEAT THE QUESTION, PLEASE.

Q. IS CERTIFYING A SAME-SEX -- I'M SORRY, A FOSTER PARENT WHO IS IN A SAME-SEX RELATIONSHIP AGAINST THE TEACHING OF THE CATHOLIC CHURCH?

A. THE CATHOLIC CHURCH ASSERTS ITS RELIGIOUS BELIEF, A MARRIAGE TO A SACRED BOND BETWEEN A MAN AND A WOMAN. SO THAT CERTIFYING A HOME OF THE SAME-SEX COUPLE WOULD BE IN VIOLATION OF THAT RELIGIOUS BELIEF.

Q. SO -- AND TO BE CLEAR, I AM NOT CHALLENGING THE SINCERITY OF THE RELIGIOUS BELIEF OR THE DOCTRINE YOU REFERENCE REGARDING SAME-SEX COUPLES OR SAME-SEX MARRIAGE. BUT WHAT IS IT ABOUT CERTIFYING THE HOME AS RESOURCE PARENTS FOR A FOSTER CHILD THAT IS AGAINST THE -- YOUR BELIEFS?

MS. BARCLAY: I OBJECT, YOUR HONOR. THIS HAS NOT ARISEN. IT IS CALLING FOR SPECULATION.

THE COURT: I'M SORRY.

MS. BARCLAY: I'M OBJECTING SINCE HE IS BEING ASKED ABOUT A PARTICULAR RESOURCE HOME, WHAT WOULD CAUSE A PROBLEM WITH THE RELIGIOUS BELIEFS. I AM NOTING THIS CALLS FOR SPECULATION.

THE COURT: OVERRULED.

THE WITNESS: BECAUSE AS I INDICATED EARLIER, A HOME STUDY IS ESSENTIALLY A VALIDATION OF THE RELATIONSHIPS IN THAT HOME, AND IN THIS CASE THAT

RELATIONSHIP IS -- THAT RELATIONSHIP IS NOT ONE THAT IS ACCEPTABLE IN TERMS OF CHURCH TEACHING.

BY MR. FIELD:

Q. LET'S TALK ABOUT HOME STUDY. WHAT DOES CSS DO IN PERFORMING A HOME STUDY?

A. WELL, THE HOME STUDY OBVIOUSLY IS DONE IN THE POTENTIAL FOSTER PARENT'S HOME AND THAT INVOLVES A THOROUGH REVIEW OF THE HOME FOR SAFETY-RELATED REASONS, FOR THE PHYSICAL PLAN OF THE HOME, THE CLEARANCES ABSOLUTELY HAVE TO BE DONE FOR ALL OF THE INDIVIDUALS IN THE HOME, AND AN EVALUATION OF THE QUALITY OF THE RELATIONSHIPS IN THAT HOME AND -- AS TO HOW THEY WOULD BEST BENEFIT THE CHILD WHO MIGHT BE PLACED THERE.

Q. TO YOUR KNOWLEDGE IS THERE ANYTHING IN THE CSS CONTRACT WITH THE CITY OR THE STATE REGULATIONS THAT APPLY TO EVALUATION OF RESOURCE PARENTS THAT REFERS TO THE MARITAL STRUCTURE OF THE HOME?

MS. BARCLAY: OBJECTION, CALLING FOR A LEGAL OPINION, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: TO MY KNOWLEDGE, THERE IS NOTHING IN THE STATE REGULATIONS THAT SPEAKS TO THE NECESSITY OR THE REQUIREMENT THAT FOSTER PARENTS BE MARRIED.

BY MR. FIELD:

Q. SO -- AND I AM GOING TO ASK AGAIN. WHAT IS IT

THAT CSS IS DOING, IF THERE IS NOTHING -- NO MARRIAGE REQUIREMENTS THAT BURDENS THIS RELIGIOUS DOCTRINE WHEN YOU ARE REVIEWING A RESOURCE PARENT?

MS. BARCLAY: OBJECTION. ASKED AND ANSWERED, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: REPEAT THE QUESTION, PLEASE.

BY MR. FIELD:

Q. WHAT IS IT ABOUT CSS'S REVIEW OF A HOUSEHOLD TO BE A RESOURCE PARENT OR AN INDIVIDUAL TO BE A RESOURCE PARENT THAT BURDENS YOUR RELIGIOUS BELIEF IF THAT PARENT HAPPENS TO BE IN A SAME-SEX RELATIONSHIP?

MS. BARCLAY: OBJECTION TO THE FORM OF THE QUESTION; COMPOUND QUESTION.

THE COURT: OVERRULED.

THE WITNESS: CATHOLIC TEACHING, AND I WILL QUALIFY THAT BY THE OBVIOUS, I AM NOT A THEOLOGIAN, CATHOLIC TEACHING -- IT IS CLEAR THAT CHILDREN ARE BEST RAISED IN A HOME THAT OF -- WHERE -- WITH A HUSBAND AND WIFE.

BY MR. FIELD:

Q. IS IT YOUR BELIEF THAT A RESOURCE PARENT IN A SAME-SEX RELATIONSHIP IS NOT QUALIFIED TO RAISE A FOSTER CHILD?

A. IT IS MY BELIEF THAT THAT FOSTER PARENT IS IN A LIFESTYLE THAT CANNOT BE ACCEPTED BY THE -- VIA THE

TEACHINGS OF THE CATHOLIC CHURCH.

Q. IS THAT THE REASON YOU REFUSED TO PERFORM CERTIFICATIONS FOR THOSE HOUSEHOLDS?

MS. BARCLAY: OBJECTION, ASKED AND ANSWERED, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: YES.

BY MR. FIELD:

Q. JIM, WHEN YOU WERE TALKING ABOUT CERTIFICATIONS BEFORE, YOUR COUNSEL ASKED YOU ABOUT A COUPLE OF OTHER CIRCUMSTANCES. I BELIEVE YOU DID SAY IT'S CORRECT THAT CATHOLIC SOCIAL SERVICES WORKS WITH FOSTER CHILDREN WHO ARE LGBTQ IDENTIFYING, IS THAT CORRECT?

A. CORRECT.

Q. AND CATHOLIC SOCIAL SERVICES WORKS WITH SINGLE PARENTS WHO ARE LGBTQ IDENTIFYING, IS THAT CORRECT?

MS. BARCLAY: OBJECTION AS TO CALLING FOR SPECULATION.

THE COURT: OVERRULED.

THE WITNESS: CATHOLIC SOCIAL SERVICES SERVES ANY INDIVIDUAL REGARDLESS OF SEXUAL ORIENTATION WHO REQUEST SERVICES AS A CLIENT FOR CATHOLIC SOCIAL SERVICES.

BY MR. FIELD:

Q. EXCEPT FOR INDIVIDUALS WHO ARE IN SAME-SEX RELATIONSHIPS?

THE COURT: HOW ABOUT UNMARRIED COUPLES?

THE WITNESS: UNMARRIED COUPLES -- WITH AN UNMARRIED COUPLE, WHAT CATHOLIC SOCIAL SERVICES DOES IN TERMS OF HOME STUDIES IS TO IMMEDIATELY REFER THE UNMARRIED COUPLE TO ANOTHER AGENCY WHO WOULD COMPLETE A HOME STUDY.

BY MR. FIELD:

Q. SO CATHOLIC SOCIAL SERVICES REFUSES TO CONDUCT HOME STUDIES FOR UNMARRIED COUPLES?

MS. BARCLAY: OBJECTION AS TO THE FORM OF THE QUESTION.

THE COURT: OVERRULED.

THE WITNESS: CATHOLIC SOCIAL SERVICES DOES NOT COMPLETE HOME STUDIES FOR UNMARRIED COUPLES BUT IMMEDIATELY PUTS THE UNMARRIED COUPLE IN TOUCH WITH ONE OF 28 OTHER AGENCIES WHO WOULD COMPLETE THAT HOME STUDY.

BY MR. FIELD:

Q. DOES CATHOLIC SOCIAL SERVICES COMPLETE HOME STUDIES FOR MARRIED COUPLES WHO ARE PREVIOUSLY DIVORCED?

A. YES.

Q. EVEN IF THAT DIVORCE HAS NOT BEEN PROPERLY ANNULLED WITH THE CATHOLIC CHURCH?

MS. BARCLAY: OBJECTION, YOUR HONOR.

THE COURT: OVERRULED.

MS. BARCLAY: IT IS SPECULATION WHETHER OR NOT THE DIVORCE HAS BEEN ANNULLED OR NOT.

MR. FIELD: I CAN REPHRASE, YOUR HONOR.

BY MR. FIELD:

Q. DOES CATHOLIC SOCIAL SERVICES ASK IF THE DIVORCE HAS BEEN ANNULLED WITH THE CATHOLIC CHURCH?

A. NO. WE ASK FOR A LETTER FROM THE COUPLE'S LOCAL CLERGY OR PASTOR.

Q. SO YOU REFERENCED ASKING FOR A CLERGY LETTER BEFORE. PLEASE EXPLAIN TO ME WHAT A CLERGY LETTER IS.

A. A CLERGY LETTER CAN BE A REFERENCE LETTER FROM A PASTOR WHO WOULD INDICATE THAT HE OR SHE KNOWS THE COUPLE, IS AWARE OF THEIR ACTIVE PARTICIPATION IN RELIGIOUS SERVICES, BOTH -- REGARDLESS OF THE FAITH, WHICH WE DEEM IS A VERY GOOD INDICATION OF THEIR COMMITMENT TO THEIR FAITH AND THEIR COMMITMENT TO RAISE A CHILD IN THAT FAITH AND THAT THAT FAITH DOES NOT HAVE TO BE AND IS USUALLY NOT CATHOLICISM.

Q. IS A CLERGY LETTER A REQUIREMENT OF CATHOLIC SOCIAL SERVICES' HOME STUDY TO CERTIFY PROSPECTIVE FOSTER PARENTS?

A. YES, WE REQUIRE THAT LETTER.

Q. IF THERE IS NOT A CLERGY LETTER, WILL YOU CERTIFY THAT PROSPECTIVE RESOURCE PARENT?

A. NOT TO MY KNOWLEDGE.

Q. YOU MENTIONED THAT THE FAITH OF THAT CLERGY LETTER DOES NOT MATTER, IS THAT CORRECT?

A. CORRECT.
Q. SO CLERGY OR A PASTOR IS THE TERM YOU ARE USING, BUT IT COULD BE A RABBI OR AN IMAM?
A. ABSOLUTELY.
Q. AND IS THERE A LETTER THAT AN INDIVIDUAL WHO DOES NOT PARTICIPATE IN RELIGIOUS WORSHIP COULD PROVIDE CATHOLIC SOCIAL SERVICES TO SATISFY THIS REQUIREMENT?
A. NOT TO MY KNOWLEDGE.
Q. WOULD ANYBODY ELSE OTHER THAN YOU HAVE THAT KNOWLEDGE?
MS. BARCLAY: OBJECTION, YOUR HONOR. THAT IS CALLING FOR SPECULATION.
THE COURT: OVERRULED.
THE WITNESS: THE STAFF THAT ARE DAY-TO-DAY IN THE FOSTER-CARE DEPARTMENT AND ARE REGULARLY HANDLING THE INQUIRIES AND THE MATTERS THAT ARISE WOULD HAVE A BETTER HANDLE ON THAT.
BY MR. FIELD:
Q. YOU OVERSEE THE STAFF, CORRECT?
A. I OVERSEE THEM THROUGH JIM BLACK, WHO REPORTS TO ME, AND OUR FOSTER-CARE ADMINISTRATOR REPORTS TO HIM.
Q. AND IT IS YOUR UNDERSTANDING, AT THE TOP OF THAT CATHOLIC SOCIAL SERVICES HIERARCHY, THAT ONE HAS TO HAVE A -- AS YOU CALL IT, A CLERGY LETTER IN ORDER TO BECOME A FOSTER PARENT THROUGH CATHOLIC SOCIAL SERVICES,

CORRECT?

MS. BARCLAY: ASKED AND ANSWERED.

THE COURT: OVERRULED.

THE WITNESS: YES.

BY MR. FIELD:

Q. JIM, IF YOU CAN JUST RETURN QUICKLY TO THE CERTIFICATION PROCESS. YOU SAID THAT THERE IS A WRITTEN ENDORSEMENT, I BELIEVE WAS THE WORD THAT YOU USED, OF THE RELATIONSHIP. WHAT IS THAT WRITTEN ENDORSEMENT?

A. IT'S THE COMPLETED --

MS. BARCLAY: OBJECTION; ASKED AND ANSWERED AGAIN.

THE COURT: OVERRULED.

THE WITNESS: IT'S THE FINAL PRODUCT OF THE WRITTEN HOME STUDY THAT APPEARS IN THE FOSTER PARENT'S CASE RECORD.

BY MR. FIELD:

Q. AND TO YOUR KNOWLEDGE, DOES THAT FINAL PRODUCT -- IS THERE A REQUIREMENT THAT FINAL PRODUCT REFERENCE THE MARRIAGE?

A. YES.

Q. AND WHAT IS -- WHERE IS THAT REQUIREMENT FOUND?

MS. BARCLAY: OBJECTION, YOUR HONOR. THE WITNESS HAS TESTIFIED THAT HE IS AWARE ABOUT THE REQUIREMENT. HE DOES NOT NEED TO CITE THE LEGAL CODE THAT

REQUIRES THAT.

THE COURT: OVERRULED.

THE WITNESS: SO ASK ME THAT AGAIN, PLEASE.

BY MR. FIELD:

Q. WHERE IS THAT REQUIREMENT FOUND IN REFERENCE TO THE MARRIAGE?

A. OUR POLICY -- WE HAVE A POLICY AND PROCEDURE STATED ON RECRUITMENT THAT INDICATES THAT -- ON FOSTER-CARE HOME STUDY THAT INDICATES THAT MARRIAGE IS REQUIRED AND THAT THE CLERGY LETTER IS REQUIRED.

Q. THESE ARE CSS'S REQUIREMENTS?

A. YES.

Q. THESE ARE NOT IN THE CONTRACT WITH THE CITY OF PHILADELPHIA?

A. NOT IN THE CONTRACT.

Q. AND TO YOUR KNOWLEDGE, NOT IN THE STATE REGULATIONS?

A. NOT IN THE STATE REGULATIONS.

THE COURT: MR. AMATO, I WANT TO ASK YOU A QUESTION THAT I AM NOT QUITE SURE WHETHER OR NOT YOU ANSWERED. DOES THE CSS CONSIDER SINGLE PARENTS WHO ARE LGBTQ FOR CERTIFICATION?

THE WITNESS: YEAH. WE WOULD COMPLETE A HOME STUDY FOR A SINGLE PARENT WHO IS LIVING MONOGAMOUSLY TO BE A FOSTER PARENT.

THE COURT: OKAY.

BY MR. FIELD:

Q. SO YOU WOULD NOT INQUIRE OF THAT SINGLE PARENT ANYTHING ABOUT THEIR SEXUAL ORIENTATION OR PRACTICES?

A. SEXUAL BEHAVIORS AND PRACTICES ARE NOT A PART OF ANY HOME STUDY.

Q. AND IF THERE WERE A RESOURCE PARENT WHO WAS PART OF AN UNMARRIED SAME-SEX COUPLE, WOULD YOU CONSIDER THEM FOR TO -- FOR CERTIFICATION AS A RESOURCE PARENT?

MS. BARCLAY: OBJECTION, ASKED AND ANSWERED. WE'VE ALREADY SPOKEN ABOUT UNMARRIED COUPLES.

THE COURT: OVERRULED.

THE WITNESS: CAN YOU PLEASE ASK ME THAT AGAIN.

BY MR. FIELD:

Q. IF THERE WAS A PROSPECTIVE RESOURCE PARENT SEEKING CERTIFICATION AND CAME TO CATHOLIC SOCIAL SERVICES AND THEY WERE PART OF AN UNMARRIED SAME-SEX COUPLE, WOULD YOU CONSIDER THEM FOR CERTIFICATION?

MS. BARCLAY: THIS IS ALSO CALLING FOR SPECULATION. THE SITUATION HAS NOT ARISEN.

THE COURT: OVERRULED.

THE WITNESS: I QUALIFY THAT FIRST BY SAYING THAT WE HAVE NOT RECEIVED ANY INTEREST IN FOSTER-CARE IN THAT PROFILE THAT YOU JUST SUGGESTED. OKAY? SO....

BY MR. FIELD:

Q. I UNDERSTAND THAT, BUT I WOULD LIKE AN ANSWER TO THE QUESTION.

A. GIVE ME THE QUESTION AGAIN.

Q. WOULD CATHOLIC SOCIAL SERVICES CERTIFY OR EVEN MOVE THROUGH THE PROCESS OF CERTIFICATION OF A PROSPECTIVE RESOURCE PARENT WHO IS IN A SAME-SEX UNMARRIED RELATIONSHIP?

A. IF THAT SITUATION AROSE, AND THE PERSON THAT THEY WERE IN AN UNMARRIED RELATIONSHIP WITH LIVED IN THAT HOME, WE WOULD NOT CONTINUE TO MOVE FORWARD WITH THAT.

Q. WHAT IF THE INDIVIDUALS WERE MONOGAMOUS?

A. THAT'S A HYPOTHETICAL SITUATION. WE HAVE NEVER RUN INTO THAT, SO....

MS. BARCLAY: AND I AM GOING TO OBJECT AGAIN TO SPECULATION, YOUR HONOR. THE WITNESS HAS ALREADY TESTIFIED THEY DON'T INQUIRE ABOUT SPECIFIC SEXUAL PRACTICES, AND SO WHAT THE HOME STUDY PROCESS LOOKS AT IS PARENTS IN THE HOME.

MR. FIELD: YOUR HONOR, I DON'T BELIEVE IT'S APPROPRIATE FOR HER TO TESTIFY ABOUT THE HOME STUDY PROCESS.

THE COURT: YES.

MS. BARCLAY: IT IS SPECULATION, YOUR HONOR.

THE COURT: HE HAS ANSWERED THE QUESTIONS.

MR. FIELD: YES.

CAN I HAVE A MINUTE WITH MY COLLEAGUES, YOUR HONOR, COURT INDULGENCE?

THE COURT: YES.

(BRIEF PAUSE IN THE PROCEEDING.)

MR. FIELD: YOUR HONOR, I ONLY HAVE A MOMENT LEFT. I HAVE TO JUST OBTAIN ONE EXHIBIT.

THE COURT: YES.

BY MR. FIELD:

Q. JIM, JUST ONE QUICK QUESTION ON THE TOPICS WE WERE COVERING BEFORE. WILL CATHOLIC SOCIAL SERVICES CERTIFY A SINGLE RESOURCE PARENT WHO IS NOT CELIBATE?

MS. BARCLAY: OBJECTION, YOUR HONOR. THE WITNESS HAS ANSWERED THEY DON'T INQUIRE AS TO SEXUAL --

THE COURT: THAT IS WHAT HE STATED, SO HE WOULD NOT KNOW.

BY MR. FIELD:

Q. IS THAT CORRECT, YOU WOULD NOT KNOW WHETHER OR NOT THEY ENGAGED IN SEXUAL ACTIVITIES?

MS. BARCLAY: OBJECTION AGAIN, YOUR HONOR. THIS HAS BEEN ANSWERED.

MR. FIELD: HE ONLY SAID THEY DON'T INQUIRE, YOUR HONOR. HE MIGHT BE TOLD THAT. I DON'T KNOW THE RANGE OF SITUATIONS THAT OCCUR, BUT THIS IS ALL A LITTLE OUTSIDE THE BOX.

THE COURT: I AM GOING TO SUSTAIN THE OBJECTION.

MR. FIELD: THANK YOU, YOUR HONOR.

BY MR. FIELD:

Q. SO, JIM, IN YOUR PRIOR QUESTIONING, YOU TALKED ABOUT COMMUNICATIONS WITH THE CITY REGARDING CLOSURE OF INTAKE AND REGARDING ONGOING CONTRACTS WITH THE CITY. IS IT CATHOLIC SOCIAL SERVICES'S POSITION THAT IT WILL NOT SIGN A FULL ONGOING CONTRACT WITH THE CITY?

MS. BARCLAY: OBJECTION, YOUR HONOR, CALLS FOR SPECULATION.

MR. FIELD: I AM ASKING THE ORGANIZATION'S POSITION.

THE COURT: RIGHT. OVERRULED.

THE WITNESS: TO UNDERSTAND THE ORGANIZATION'S POSITION IS TO UNDERSTAND THE OVERALL CONTRACT. IN THE CITY TERMINOLOGY, THIS IS A 290 REPLACEMENT CONTRACT THAT INVOLVES NOT ONLY FOSTER-CARE BUT ST. GABRIEL'S AND ST. FRANCIS AND OUR REINTEGRATION PROGRAM. SO WE WOULD MOVE FORWARD WITH THAT CONTRACT BECAUSE THOSE KIDS -- IT'S AN IMPORTANT MISSION FOR US. IT'S AN IMPORTANT CONTRACT AND THE CHILDREN NEED TO BE SERVED.

BY MR. FIELD:

Q. AND ST. GABRIEL'S AND ST. FRANCIS --

A. ST. GABRIEL'S SYSTEM, WHICH IS ST. GABRIEL'S

HALL, IS 150 ADJUDICATED DELINQUENT BOYS. ST. FRANCIS AND ST. VINCENT'S IS 115 ADOLESCENT BOYS AND GIRLS, PLACED IN GROUP HOMES.

Q. AND THAT IS CONGREGATE UNITS?

A. GROUP HOMES, YES.

Q. GROUP HOMES?

A. ST. GABE'S IS CONGREGATE INSTITUTIONAL CARE. ST. FRANCIS IS SMALL GROUP HOMES.

Q. FOR THE CONTRACT THAT IS TERMINATING ON JUNE 30TH, THOSE WERE PART OF THE SAME CONTRACT, IS THAT CORRECT?

A. YES.

Q. AND ISN'T IT TRUE THAT YOU HAVE RECEIVED TWO SEPARATE NOTICE OF AWARDS FOR THE COMING YEAR'S CONTRACTS FROM THE CITY WHICH SEPARATED THE FOSTER-CARE SERVICES THAT ARE AT ISSUE IN THIS LITIGATION AND WHAT YOU WERE JUST TALKING ABOUT, GROUP HOMES, CONGREGATE CARE?

MS. BARCLAY: OBJECTION TO THE FORM OF THE COMPOUND QUESTION.

THE COURT: YES. BREAK IT DOWN, PLEASE.

BY MR. FIELD:

Q. DID YOU RECEIVE NOTICES OF AWARDS FOR THE COMING CONTRACT YEAR FROM THE CITY?

A. I RECEIVED A CONTRACT LETTER WITH A COVER LETTER

FROM THE COMMISSIONER THAT INDICATED THAT THE 290 CONTRACT WOULD BE MOVING FORWARD, BUT EXPLICITLY NOTED THAT WOULD BE A TRANSITION FOR CSS FOSTER-CARE.

Q. DID THE CITY OFFER -- ISN'T IT TRUE THAT THE CITY OFFERED YOU A FULL CONTRACT FOR FOSTER-CARE IF CATHOLIC SOCIAL SERVICES WOULD COMPLY WITH ALL OF ITS OBLIGATIONS UNDER THAT CONTRACT?

MS. BARCLAY: OBJECTION, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: I DON'T RECALL EVER BEING MADE THAT OFFER.

MR. FIELD: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

BY MR. FIELD:

Q. MR. AMATO, I HAVE JUST GIVEN YOU A DOCUMENT MARKED DEFENDANT'S EXHIBIT 2.

A. RIGHT.

Q. THIS IS AN E-MAIL FROM JONATHAN JANISZEWSKI WHO I'LL REPRESENT IS AN ATTORNEY WITH THE CITY OF PHILADELPHIA TO LORI WINDHAM FROM BECKET FUND, HERE TODAY, DATED JUNE 5TH AND REQUEST THAT MS. WINDHAM FORWARD THE MESSAGE TO YOU. CAN YOU TAKE A LOOK AT THE PART THAT BEGINS, DEAR MR. AMATO?

A. OKAY.

Q. HAVE YOU SEEN THIS DOCUMENT BEFORE?
A. I HAVE.
Q. DOES THIS REFRESH YOUR RECOLLECTION ABOUT WHETHER OR NOT THE CITY EVER OFFERED YOU A FULL CONTRACT FOR FOSTER-CARE SERVICES FOR THE COMING YEAR?
MS. BARCLAY: I OBJECT, YOUR HONOR. THE FULL CONTRACT IS VAGUE. IT'S NOT CLEAR EXACTLY WHAT IS BEING ASKED OF THE WITNESS.
THE COURT: OFFERED A CONTRACT.
MS. BARCLAY: THERE ARE MULTIPLE CONTRACTS BEING OFFERED.
THE COURT: HE SAID FOSTER-CARE.
MS. BARCLAY: THERE HAVE BEEN MULTIPLE OFFERS -- TWO DIFFERENT TYPES OF --
THE COURT: THIS SHOULD BE NO PROBLEM WITH THIS EXHIBIT.
THE WITNESS: GIVE THAT TO ME AGAIN, PLEASE.
BY MR. FIELD:
Q. DOES THIS REFRESH YOUR RECOLLECTION ABOUT CONTRACT DISCUSSIONS WITH THE CITY?
A. IT REFRESHES MY MEMORY ABOUT THIS LETTER.
Q. CAN YOU READ THE LAST PARAGRAPH -- FULL PARAGRAPH THAT STARTS "PLEASE"?
A. PLEASE KNOW THAT DHS VALUES ITS HISTORIC RELATIONSHIP WITH CSS AND IF CSS IS ABLE TO FIND A WAY

TO APPROVE SAME-SEX FOSTER AND ADOPTIVE PARENTS CONSISTENT WITH CURRENT LAW AND CITY POLICY, DHS WILL OFFER CSS A NEW CONTRACT THAT ALLOWS CSS TO CONTINUE TO SELECT AND RECRUIT NOW FOSTER PARENTS AND CONTINUE TO RECEIVE NEW REFERRALS. HOWEVER, IF CSS IS UNABLE TO DO SO, DHS STILL SENDS YOU -- INTENDS TO SEND YOU AN OFFICIAL AWARD LETTER TO PREPARE FOR A NEW CONTRACT UNDER THE TERMS DESCRIBED ABOVE. YOU SHOULD ANTICIPATE RECEIVING DHS OFFICIAL AWARD LETTER LATER THIS WEEK. PLEASE CONTACT ME IF YOU WISH TO DISCUSS THE MATTER.

Q. WILL CSS ENTER INTO A CONTRACT WITH THE CITY CONSISTENT WITH CURRENT LAW AND POLICY ARTICULATED IN THAT PARAGRAPH?

MS. BARCLAY: OBJECTION, YOUR HONOR.

MR. FIELD: FOR FOSTER-CARE SERVICES.

MS. BARCLAY: HE IS ASKING FOR THE LEGAL --

THE COURT: OVERRULED.

THE WITNESS: THE CSS WILL ENTER A CONTRACT WITH THE CITY UNDER THE 290 CONTRACT WITH THE IDEA THAT OUR -- THAT OUR WITHDRAWAL FROM THE CONTRACT AND THE OVERALL -- AND THE CONTRACT COULD BE WITHIN JUST A MATTER OF MONTHS.

BY MR. FIELD:

Q. CAN YOU EXPLAIN THAT?

A. YOU CAN'T SUSTAIN A CONTACT WITHOUT REFERRALS. SO THAT ULTIMATELY WE ARE GOING TO HAVE TO PHASE OUT THE

PROGRAM AND THE STAFF.

Q. I WAS ASKING IF YOU WOULD ENTER INTO A CONTRACT THAT REQUIRED YOU TO DO THE FULL SET OF FOSTER-CARE SERVICES.

MS. BARCLAY: OBJECTION AS TO SPECULATION AS TO WHAT THE FULL CONTRACT WOULD ENTAIL AS FAR AS CONTRACT TERMS.

THE COURT: TO THE EXTENT THAT THEY HAVE ALREADY ENTERED INTO A CONTRACT AND THEY HAVE BEEN -- ARE UNDER CONTRACT WITH THE CITY FOR A NUMBER OF YEARS, I'M SURE THAT MR. AMATO UNDERSTANDS THE PROVISIONS, GENERAL PROVISIONS OF THE CONTRACT, SO HE CAN ANSWER.

MS. BARCLAY: YOUR HONOR, IF I MAY ADD, THE CITY HAS INDICATED THAT PROVISIONS WILL BE CHANGING IN THE NEW CONTRACT, WHICH IS WHY IT'S CALLING FOR SPECULATION.

MR. FIELD: YOUR HONOR, I DON'T BELIEVE IT'S APPROPRIATE FOR OPPOSING COUNSEL TO BE TESTIFYING ABOUT THESE MATTERS.

THE COURT: OVERRULED. YOU MAY ANSWER THE QUESTION, IF YOU CAN.

THE WITNESS: CAN YOU PLEASE ASK THE QUESTION AGAIN.

BY MR. FIELD:

Q. IN THE DOCUMENT MARKED DEFENDANT'S EXHIBIT 2, THE CITY STATED THAT CONSISTENT WITH CURRENT LAW AND

CITY POLICY, DHS WOULD OFFER CSS A NEW CONTRACT THAT ALLOWS CSS TO CONTINUE TO SELECT AND RECRUIT NEW FOSTER PARENTS AND CONTINUE TO RECEIVE NEW REFERRALS. WILL CSS ENTER INTO THAT CONTRACT CONSISTENT WITH LAW AND CITY POLICY?

MS. BARCLAY: OBJECTION, YOUR HONOR.

THE COURT: YOU MAY ANSWER.

THE WITNESS: FOR THE SAKE OF THE CHILDREN THAT ARE CURRENTLY IN OUR SERVICES, FOSTER PARENTS WILL ENTER INTO A NEW CONTRACT WITH THE CITY, BUT WE WILL NOT BEGIN TO MOVE FORWARD WITH DOING HOME STUDY FOR SAME-SEX COUPLES.

BY MR. FIELD:

Q. YOU WILL ENTER INTO A NEW CONTRACT WITH THE CITY, BUT WILL NOT PERFORM HOME STUDY FOR SAME-SEX COUPLES?

A. CORRECT.

Q. JIM, I HAVE JUST HANDED YOU A DOCUMENT MARKED DEFENDANT'S EXHIBIT 3. CAN YOU TAKE A MINUTE AND LOOK THAT OVER. HAVE YOU SEEN THIS DOCUMENT BEFORE?

A. I HAVE.

Q. IS THIS A NOTICE OF AWARD THE CITY SENT TO YOU?

A. IT IS.

Q. AND THIS DOCUMENT, CAN YOU READ THE FIRST PARAGRAPH THERE?

A. THIS LETTER IS TO PROVIDE YOU WITH INFORMATION ON THE CITY OF PHILADELPHIA DHS HEREIN AND AFTER DHS DEPARTMENT CONTRACT PROCESS FOR FISCAL YEAR 2019 BEGINNING ON JULY 1ST, 2018. THE FUNDING LEVELS REFERENCED ABOVE REFLECT THE BUDGET RESTRAINTS AND PRIORITIES.

Q. AND THE NEXT PARAGRAPH ARTICULATES THE CITY'S POLICY OF NONDISCRIMINATION, CORRECT?

A. CORRECT.

Q. AND AM I READING THE SENTENCE THERE RIGHT THAT SAYS THAT DHS WILL CONTINUE TO MAKE PAYMENTS TO CSS FOR THE ADMINISTRATION AND MAINTENANCE OF EXISTING FOSTER HOMES WHERE CHILDREN IN DHS'S CARE RESIDE?

A. YES.

MS. BARCLAY: OBJECTION, YOUR HONOR. THAT CALLS FOR SPECULATION; ALSO FORM OF THE QUESTION.

THE COURT: OVERRULED.

BY MR. FIELD:

Q. CAN YOU READ THE THIRD AND FOURTH PARAGRAPHS THERE FOR ME, PLEASE.

A. ADDITIONALLY, THE FY 19 CONTRACT WILL ALLOW FOR REFERRALS OF NEW JOB FOSTER-CARE PLACEMENTS ONLY IN LIMITED AUTHORIZED CIRCUMSTANCES WHERE CSS PLACEMENT IS IN THE BEST INTERESTS OF THE CHILD. SINCE A CHILD SHARES A PRIOR RELATIONSHIP WITH A FOSTER OR

PRE-ADOPTIVE PARENT OR WHERE SIBLINGS SHOULD BE PLACED TOGETHER. THE NEW CONTRACT ALSO PROVIDES TIME FOR THE ORDERLY TRANSITION OF SERVICES SHOULD THAT BECOME NECESSARY. THE CONTRACT AMOUNT HAS BEEN ADJUSTED TO REFLECT THE VOLUME OF SERVICES PROJECTED UNDER THE NEW SCOPE OF THE CONTRACT.

Q. WHEN YOU SAID CSS WOULD ENTER INTO A CONTRACT WITH THE CITY FOR CARE OF CHILDREN IN AN ORDERLY TRANSITION, IS THIS THE TYPE OF CONTRACT YOU ARE REFERRING TO?

MS. BARCLAY: OBJECTION, YOUR HONOR. MAY WE RECEIVE A PROFFER FOR THE RELEVANCE OF THIS LINE OF QUESTIONING. WE ARE NOT HAVING CONTRACT NEGOTIATIONS RIGHT NOW AS PART OF THE TESTIMONY. I DON'T UNDERSTAND WHY THIS IS RELEVANT TO THE MATTER AT HAND OR WITH THE SCOPE OF THE DIRECT. THIS IS NOT SOMETHING THAT MR. AMATO DISCUSSED.

MR. FIELD: CSS HAS REPRESENTED THEY HAVE TO START LAYING OFF PEOPLE IMMEDIATELY AND THAT THE HARM THE BUSINESS WILL SUFFER IS IMMEDIATE AND EXTREME, AND THEIR WILLINGNESS TO ENTER INTO A CONTRACT WITH THE CITY THAT WILL MITIGATE THAT HARM IS DIRECTLY RELEVANT TO THIS LITIGATION.

THE COURT: OVERRULED.

THE WITNESS: LAST QUESTION AGAIN.

BY MR. FIELD:

Q. PREVIOUSLY YOU HAD SAID THAT CSS WOULD ENTER

INTO A CONTRACT WITH THE CITY FOR ONGOING CARE THAT DID NOT REQUIRE CSS TO DO THE CERTIFICATIONS OF SAME-SEX COUPLES, CORRECT?

A. RIGHT.

Q. THE NOTICE OF AWARD YOU JUST READ, IS THAT GENERALLY THE TYPE OF CONTRACT YOU WERE TALKING ABOUT?

MS. BARCLAY: OBJECTION, YOUR HONOR, AS TO SPECULATION.

THE COURT: OVERRULED. CAN YOU ANSWER THAT QUESTION?

THE WITNESS: YES. THE WAY I WOULD ANSWER THAT QUESTION IS BASICALLY THIS WOULD BE THE TRANSITION YEAR AND WE WOULD BE -- MY PREDICTION, WE WOULD BE OUT OF THE FOSTER-CARE MISSION WITHIN SEVERAL MONTHS.

BY MR. FIELD:

Q. BUT YOU WOULD ENTER INTO THAT CONTRACT?

MS. BARCLAY: OBJECTION, YOUR HONOR.

THE COURT: HE'S ANSWERED.

THE WITNESS: OKAY.

MR. FIELD: THANK YOU, YOUR HONOR.

PERMISSION TO APPROACH THE WITNESS, YOUR HONOR?

THE COURT: YES.

BY MR. FIELD:

Q. MR. AMATO, JIM, I HAVE JUST HANDED YOU A LETTER

DATED JUNE 11TH, ADDRESSED TO YOU FROM CYNTHIA FIGUEROA?
A. UM-HUM.
Q. IT SAYS, FISCAL YEAR 2019 AWARD LETTER, TRIAL WELFARE OPERATIONS PLACEMENT SERVICES CONGREGATE CARE $18,505,119. HAVE YOU SEEN THIS LETTER BEFORE?
A. YES.
Q. IS THIS A NOTICE OF AWARD FOR A NEW CONTRACT RELATED TO THE -- WHAT WE TALKED ABOUT BEFORE, I BELIEVE, AS GROUP CARE CONGREGATE CARE?
A. WHAT STRUCK ME WHEN I SAW THIS LETTER --
Q. CAN YOU JUST PLEASE TELL ME WHETHER THIS IS A NOTICE OF AWARD FOR THE CONTRACTS OR WHAT YOU WERE TALKING ABOUT UNDER THE GROUP CARE?
A. YES, AS THE SHORT --
MS. BARCLAY: OBJECTION TO SPECULATION AND HE IS ASKING TO CHARACTERIZE A DIFFERENT TYPE OF DOCUMENT.
MR. FIELD: I AM ASKING THIS WITNESS WHAT HIS UNDERSTANDING OF THIS DOCUMENT IS.
THE COURT: OVERRULED.
THE WITNESS: MY UNDERSTANDING OF THE DOCUMENT, DHS HAS CONTINUED TO BE INTERESTED IN OUR DOING MISSION AS USUAL IN CONGREGATE CARE, BUT SEGREGATING FOSTER-CARE FROM THAT CONTRACT.
BY MR. FIELD:
Q. THIS IS A NOTICE OF AWARD FOR THE CONTRACT FOR

THAT CONGREGATE PORTION YOU WERE JUST TALKING ABOUT?

A. THAT'S MY UNDERSTANDING.

MS. BARCLAY: ASKED AND ANSWERED, YOUR HONOR.

MR. FIELD: THANK YOU. NO FURTHER QUESTIONS AT THIS TIME, YOUR HONOR.

THE COURT: OKAY. WE WILL TAKE A BRIEF RECESS AND YOU CAN REDIRECT.

MS. BARCLAY: THANK YOU.

(BRIEF RECESS.)

THE COURT: OKAY. YOU MAY BE SEATED.

REDIRECT.

MS. BARCLAY: YES, YOUR HONOR.

REDIRECT EXAMINATION

BY MS. BARCLAY:

Q. MR. AMATO, YOU WERE JUST ASKED A NUMBER OF HYPOTHETICAL QUESTIONS ABOUT THE TYPE OF FOSTER PARENTS THAT MIGHT ASK FOR HOME STUDY CERTIFICATIONS.

I JUST WANT TO CLARIFY THAT YOU WERE -- YOU UNDERSTOOD THOSE TYPES IN THE PROSPECTIVE FOSTER FAMILY APPROACHING CATHOLIC SOCIAL SERVICES AND REQUESTING HOME STUDY SERVICES; IS THAT CORRECT?

A. THAT IS CORRECT.

Q. NOW, THERE WAS SOME DISCUSSION ABOUT CSS COMMUNICATIONS THE WEEK AFTER MAY 25TH REGARDING DOE FOSTER CHILD NUMBER ONE, AND YOU MENTIONED THAT MR. JIM

BLACK HAD SOME INFORMATION ABOUT THAT INFORMATION IN THE BEGINNING OF THE WEEK, CORRECT?

A. WELL, HE ACTUALLY -- HE RELAYED THAT TO ME IN THE BEGINNING OF THE WEEK.

Q. RIGHT.

A. HIS INFORMATION WAS FROM THE NIGHT OF THE EMERGENCY PLACEMENT.

MR. FIELD: OBJECTION. FOUNDATION.

MS. BARCLAY: THIS IS RELATED TO HIS WITNESS.

THE COURT: OVERRULED.

BY MS. BARCLAY:

Q. WAS YOUR UNDERSTANDING AT THAT POINT EARLIER IN THE WEEK THAT MR. BLACK HAD ALL OF THE RELEVANT DETAILS ABOUT THE SITUATION?

A. I THINK THE ONLY RELEVANT DETAIL THAT HAD NOT EMERGED BUT EMERGED ONLY A DAY OR TWO LATER WAS THE WONDERFUL NEWS THAT THE CSS FOSTER MOTHER WAS ADOPTION -- IS ADOPTION-MINDED.

Q. ON MAY 1ST THERE WAS AN E-MAIL THAT WAS DISCUSSED, AND THIS IS FROM YOU TO JESSICA SHAPIRO.

DO YOU STILL HAVE THAT IN FRONT OF YOU, MR. AMATO?

A. OH, YEAH, HERE IT IS.

Q. I JUST WANT TO DRAW YOUR ATTENTION TO TWO DIFFERENT LINES IN THIS E-MAIL. IN THE FIRST PARAGRAPH

IT SAYS: "CASES WITH CUA, BUT THERE ARE UNCERTAINTIES ABOUT APPROVING THIS GIVEN THE FREEZE." AND YOU ALSO SAY: "THIS IS IN FRONT OF CUA WITH QUESTIONS FOR CSS INTAKE FREEZE."

CAN YOU TELL US WHAT YOU MEANT ABOUT THIS UNCERTAINTY?

A. JUST SO I AM CLEAR, I AM LOOKING AT AN E-MAIL FROM ME TO COMMISSIONER FIGUEROA ON MAY 1ST.

Q. THAT'S RIGHT.

A. ALL RIGHT. IS THAT THE REDACTED ONE THAT WE ARE LOOKING AT?

Q. THESE LINES ARE NOT VISIBLE IN THE REDACTED VERSION.

A. OKAY. SO CAN YOU ASK ME YOUR QUESTION AGAIN, PLEASE?

Q. YES. SO THERE'S TWO LINES IN THE E-MAIL. IT SAYS: "THE CASES WITH CUA THAT THERE'S UNCERTAINTY ABOUT APPROVING THIS GIVEN THE PRESENT FREEZE."

THAT'S THE FIRST PARAGRAPH. AND THE SECOND PARAGRAPH, IT SAYS: "THIS IS ALSO IN FRONT OF CUA WITH QUESTIONS AS CSS INTAKE FREEZE."

CAN YOU DESCRIBE A LITTLE BIT WHAT YOU MEANT ABOUT THESE QUESTIONS AND UNCERTAINTY ABOUT THE INTAKE FREEZE?

A. AGAIN, THAT GETS BACK TO THE FACT THAT -- AND

THE WAY THAT I LOOK AT IT, THAT WE -- THE EXCEPTION POLICY WAS NEVER ARTICULATED BY THE CITY. SO ANY TIME SOMETHING CAME UP, I THOUGHT IT WAS DUE DILIGENCE AND GOOD PRACTICE AND THE RIGHT THING TO DO TO GET IN TOUCH WITH HIM, THE COMMISSIONER, AND TELL HER THAT THIS WAS GOING ON.

Q. ON MAY 25TH, WHICH WAS AFTER THE STAFF -- THAT'S WHEN CUA STAFF KIND OF COMMUNICATED THAT THEY WERE GOING TO DENY IT BECAUSE OF THE CASE ONGOING WITH CATHOLIC SOCIAL SERVICES, CORRECT?

A. YEAH, WELL THAT'S DOE 2, DOE 1?

Q. YES, BECAUSE IT WAS RELATED TO DOE 1. THEY WERE GOING TO DENY THAT PLACEMENT?

MR. FIELD: OBJECTION, HEARSAY.

THE COURT: OVERRULED.

BY MS. BARCLAY:

Q. IS THAT CORRECT, MR. AMATO?

A. YES, THAT'S CORRECT.

Q. WAS PART OF YOUR CONCERN ABOUT THE DOE FOSTER CHILD SITUATION THAT THAT SITUATION COULD REPEAT AGAIN GIVEN THE DHS RESPONSE?

A. ABSOLUTELY. JUST TO GET THAT ON THE RIGHT TRACK, TOOK A NUMBER OF VERY COMPLICATED AND INTENSE FOLLOW-UPS. IF THAT WASN'T THERE, KIDS COULD FALL THROUGH THE CRACKS EASILY.

Q. I WANT TO DRAW YOUR ATTENTION TO SOME OF THE DISCUSSIONS ABOUT ADDITIONAL POTENTIAL CONTRACTS WITH THE CITY.

NOW, IF THE CITY WERE OFFERING WHAT THEY HAVE DESCRIBED AS A FULL CONTRACT THAT ALLOWED CATHOLIC SOCIAL SERVICES TO CONTINUE TO PROVIDE FOSTER-CARE, CONSISTENT WITH ITS RELIGIOUS BELIEFS, AS IT HAS DONE FOR OVER 50 YEARS, WOULD CATHOLIC SOCIAL SERVICES BE ABLE TO CONTINUE PROVIDING SERVICES?

A. CERTAINLY.

Q. AND IN FACT, IF THE CITY AGREED TO THAT, WOULD THERE EVEN BE A NEED FOR THIS LAWSUIT?

A. ABSOLUTELY NOT.

Q. SO WITH THE PARTIAL CONTRACT THAT THEY HAVE, DRAWING YOUR ATTENTION TO THE PARTIAL AWARD LETTER AND THE E-MAIL FROM JONATHAN JANISZEWSKI -- I APOLOGIZE IF I AM SAYING THAT WRONG, WHAT IS YOUR UNDERSTANDING WILL BE --

MR. FIELD: OBJECTION TO THE CHARACTERIZATION AS IT BEING PARTIAL, YOUR HONOR.

THE COURT: SUSTAINED.

JUST REPHRASE.

BY MS. BARCLAY:

Q. IN THE E-MAIL FROM JONATHAN JANISZEWSKI, THAT AT THE THIRD PARAGRAPH TO YOU IT SAYS: "DHS STILL INTENDS

TO SEND YOU AN OFFICIAL AWARD TO PREPARE FOR A NEW CONTRACT UNDER THE TERMS DESCRIBED ABOVE. YOU SHOULD ANTICIPATE RECEIVING DHS'S OFFICIAL AWARD LETTER LATER THIS WEEK."

DID YOU UNDERSTAND THAT AWARD LETTER TO BE THE OTHER DOCUMENT THAT WAS WRITTEN BY CYNTHIA FIGUEROA ON JUNE 11TH?

A. NO. AGAIN, THE JUNE 11TH WENT TO ME. I AM GOING IN REVERSE ORDER HERE, SIMPLY VERIFIED THAT DHS CONTINUES TO WANT THE CONTRACT AND NEED OUR CONGREGATE CARE SERVICES. THE JUNE 5TH MEMO, BASICALLY, TO ME IN A NUTSHELL IS, YOU EITHER FOLLOW ACCORDING TO THE PROVISIONS THAT DHS PROVIDED, OR YOU ARE BASICALLY GOING -- THAT MISSION IS GOING TO EVAPORATE OVER TIME.

Q. I SHOULD CLARIFY. ALL OF MY QUESTIONS ARE GOING TO BE IN THE CONTEXT OF YOUR FOSTER-CARE PROGRAM, AND WE'RE NOT TALKING ABOUT ANY OF THE OTHER CARE PROGRAMS RIGHT NOW.

A. OH, OKAY.

Q. SO IF YOU LOOK AT THIS JUNE 11, 2018 LETTER, IT SAYS: "THE FY19 CONTRACT WILL ALLOW FOR REFERRALS OF NEW CHILD AND FOSTER-CARE PLACEMENT ONLY IN LIMITED AUTHORIZED CIRCUMSTANCES WHERE CSS PLACEMENT IS IN THE BEST INTEREST OF THE CHILD, SUCH AS FOR THE CHILD SHARES A PRIOR RELATIONSHIP WITH FOSTER PREADOPTIVE PARENTS, OR

WHERE SIBLINGS SHOULD BE PLACED TOGETHER. THE NEW CONTRACT WILL ALSO PROVIDE TIME FOR THE ORDERLY TRANSITION OF SERVICES SHOULD THAT BECOME NECESSARY."

DID YOU UNDERSTAND, THIS DOCUMENT THAT THE CITY IS CALLING AN AWARD LETTER, TO BE THE NORMAL TYPE OF AWARD LETTER YOU WOULD RECEIVE FOR THE FULL CONTRACT?

A. OH, NO, IT'S SUBSTANTIALLY DIFFERENT.

Q. SO UNDER THIS ARRANGEMENT, WHAT WOULD BE THE CONSEQUENCE IN A MATTER -- THE CONSEQUENCE TOWARD THE CATHOLIC SOCIAL SERVICES FOSTER PROGRAM?

A. SADLY, ALL STAFF WOULD BE LAID OFF, AND THE PROGRAM WOULD CEASE.

Q. NOW, I WOULD ALSO LIKE TO DIRECT YOUR ATTENTION TO ANOTHER LETTER FROM THE CITY.

MS. BARCLAY: PERMISSION TO APPROACH THE WITNESS, YOUR HONOR.

THE COURT: YES.

BY MS. BARCLAY:

Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS BEEN MARKED PLAINTIFF'S EXHIBIT NUMBER 13. I AM GOING TO DRAW YOUR ATTENTION, MR. AMATO, IF YOU TURN NOT TO THE FIRST PAGE, NOT THE SECOND PAGE, BUT THE THIRD PAGE, AND THERE'S A PARAGRAPH IN THE MIDDLE?

A. UM-HUM.

Q. IT SAYS: "PLEASE ALSO NOTE THAT CSS'S CURRENT NEW CONTRACT EXPIRES ON JUNE 30TH, 2018, AND THE CITY IS UNDER NO LEGAL OBLIGATION TO ENTER INTO A NEW CONTRACT FOR ANY PERIOD THEREAFTER. WE ARE HOPEFUL THAT WE CAN WORK OUT ANY DIFFERENCES BEFORE THEN, BUT PLEASE BE ADVISED THAT EXCEPT FOR IN THE BEST INTEREST OF THE CHILD ^DEMANDS OTHERWISE, THE CITY DOES NOT PLAN TO AGREE TO ANY FURTHER REFERRALS TO CSS, AND THE CITY INTENDS TO ASSIST WITH THE TRANSITION OF FOSTER FAMILIES TO OTHER AGENCIES ABSENT ASSURANCES THAT CSS IS PREPARED TO ADHERE TO CONTRACTUAL OBLIGATIONS, AND AN IMPLICATION OF CITY CONTRACT TO COMPLY WITH ALL APPLICABLE LAWS, INCLUDING THOSE RELATING TO NONDISCRIMINATION. WE BELIEVE OUR CURRENT CONTRACT WITH CSS IS QUITE CLEAR THAT THIS IS OUR RIGHT, BUT PLEASE BE ADVISED THAT ANY FURTHER CONTRACT WITH CSS WILL BE EXPLICIT IN THIS REGARD."

WHAT WAS YOUR UNDERSTANDING ABOUT THE MEANING OF THIS COMMUNICATION FROM THE CITY?

A. QUITE FRANKLY, THEY WERE ON A SHORT ROPE AND THAT REFERRALS -- THEY CARRY US OVER UNTIL THE PROGRAM BASICALLY DRIED UP IN A MATTER OF MONTHS, AND WE WOULD HAVE NO FOSTER-CARE PROGRAM.

Q. THIS LAST SENTENCE: "WE BELIEVE OUR CURRENT CONTRACT WITH CSS IS QUITE CLEAR THAT IS OUR RIGHT, BUT

PLEASE BE ADVISED THAT ANY FURTHER CONTRACT WITH CSS WILL BE EXPLICIT IN THIS REGARD."

DID THIS GIVE AN INDICATION THAT POTENTIALLY FUTURE FULL CONTRACTS, AS THE CITY CHARACTERIZES THEM, WOULD HAVE DIFFERENT CONTRACT TERMS THAN YOU HAVE SEEN IN THE PAST?

A. YES.

Q. AND WOULD YOU NEED TO REVIEW CONTRACT TERMS OF A NEW FULL CONTRACT TO ENSURE THAT YOU COULD CONTINUE TO PROVIDE FOSTER-CARE SERVICES CONSISTENT WITH YOUR RELIGIOUS BELIEFS, AS YOU HAVE DONE FOR THE LAST 50 YEARS?

A. YES.

Q. IS IT YOUR POSITION, MR. AMATO, THAT THE PRODUCT OF A FINAL HOME STUDY INCLUDES A WRITTEN ENDORSEMENT OF ANY RELEVANT RELATIONSHIPS OF THE FOSTER PARENT?

A. IT IS.

Q. THAT'S YOUR SINCERE BELIEF, CORRECT?

A. IT IS.

Q. AND THE SINCERE BELIEF OF CATHOLIC SOCIAL SERVICES?

A. YES.

Q. NOW, IS IT YOUR UNDERSTANDING THAT EVALUATION OF THE RELATIONSHIPS OF THE PARENTS IS REQUIRED BY STATE LAW FOR A HOME STUDY?

A. YES.

Q. I JUST WANT TO DIRECT YOUR ATTENTION TO THE 3700 REGULATIONS DOT 64. YOU ARE FAMILIAR WITH THE REQUIREMENT UNDER (A)(3)(B)(1) THAT AN AGENCY EVALUATE, QUOTE: "EXISTING FAMILY RELATIONSHIPS ADDED TO AND EXPECTATIONS REGARDING THE APPLICANT'S OWN CHILDREN AND PARENT-CHILD RELATIONSHIPS, ESPECIALLY THAT THEY MIGHT AFFECT A FOSTER CHILD." CORRECT?

A. YES.

Q. AND YOU ALSO UNDERSTOOD THAT UNDER THIS STATE LAW, CATHOLIC SOCIAL SERVICES IS ENTITLED AND INDEED REQUIRED TO EVALUATE THE ABILITY OF THE APPLICANT TO WORK IN PARTNERSHIP WITH CATHOLIC SOCIAL SERVICES, CORRECT?

A. YES.

Q. AND IT WAS YOUR UNDERSTANDING THAT THIS STATE LAW REQUIREMENT MEANT THAT YOU, TO PERFORM AN ADEQUATE HOME STUDY, NEEDED TO EVALUATE THE RELATIONSHIPS OF ANY FOSTER PARENT LIVING IN THE SAME HOME, CORRECT?

A. YES.

MS. BARCLAY: JUST ONE MOMENT, YOUR HONOR.

THANK YOU, MR. AMATO. NO FURTHER QUESTIONS.

THE COURT: ANY OTHER QUESTIONS?

MR. FIELD: JUST TWO BRIEF QUESTIONS, YOUR HONOR.

RECROSS-EXAMINATION

BY MR. FIELD:

Q. JIM, A MINUTE AGO, IN TALKING TO YOUR COUNSEL YOU SAID THAT A PRODUCT OF THE HOME STUDY INCLUDES A WRITTEN ENDORSEMENT OF RELATIONSHIPS OF THE PARENTS; IS THAT CORRECT?

A. YES.

Q. IS THAT A WRITTEN ENDORSEMENT OF ANY RELATIONSHIPS THAT EXIST IN THAT HOUSEHOLD THAT IS SUBJECT TO THE HOME STUDY?

MS. BARCLAY: OBJECTION, YOUR HONOR, ASKED AND ANSWERED ON HIS DIRECT.

THE COURT: OVERRULED.

THE WITNESS: YES.

BY MR. FIELD:

Q. AND YOUR COUNSEL JUST READ YOU A PORTION OF THE 3700 REGULATIONS.

ARE YOU FAMILIAR WITH THOSE?

A. YES.

Q. AND I BELIEVE THE QUOTE SHE READ YOU IN HER WORDS WAS ABILITY OF APPLICANT TO WORK IN PARTNERSHIP WITH CATHOLIC SOCIAL SERVICES.

IS IT CORRECT TO SAY THE RIGHTS -- SAY THE ABILITY OF THE APPLICANT TO WORK IN PARTNERSHIP WITH AN AGENCY?

A. YES.

Q. THEY DON'T SPECIFICALLY REFER TO CATHOLIC SOCIAL SERVICES, RIGHT?

A. NO.

Q. DOES ANYWHERE IN THE REGS TALK ABOUT THE ABILITY OF THE AGENCY TO WORK WITH THE APPLICANT, TO YOUR KNOWLEDGE?

MS. BARCLAY: OBJECTION, YOUR HONOR. IT'S ASKING FOR A LEGAL QUESTION, AND AS FAR AS QUOTING FROM REGS, HE MAY NOT BE AWARE OF.

MR. FIELD: I AM ASKING, TO HIS KNOWLEDGE, IS IT IN THE REGULATIONS, AND NOT ASKING HIM TO INTERPRET THE LEGAL MEANING OF THAT.

THE COURT: OVERRULED.

THE WITNESS: CAN YOU PLEASE ASK ME THAT AGAIN?

BY MR. FIELD:

Q. DO THE REGULATIONS ANYWHERE, TO YOUR KNOWLEDGE, REFER TO OR DISCUSS THE ABILITY OF THE AGENCY TO WORK WITH THE APPLICANT OR AN AGENCY TO WORK WITH AN APPLICANT?

A. NOT TO MY KNOWLEDGE.

MR. FIELD: THANK YOU. I HAVE NOTHING FURTHER, YOUR HONOR.

THE COURT: OKAY. ANY OTHER QUESTIONS?

MS. BARCLAY: NOTHING FURTHER, YOUR HONOR.

THE COURT: OKAY. THANK YOU, MR. AMATO.

DOES THE PLAINTIFF HAVE ANY FURTHER WITNESSES?

MS. WINDHAM: YOUR HONOR, WE DO NOT HAVE ANY FURTHER WITNESSES. HOWEVER, WE DO WANT TO MAKE TWO MOTIONS. ONE MOTION FIRST TO MOVE THE ADMISSION OF THE DOCUMENTS THAT WERE ATTACHED TO THE JAMES AMATO DECLARATION. WE HAVE ABOUT 20 DIFFERENT DOCUMENTS, WHICH WERE ATTACHED TO THAT DECLARATION, AND HE AUTHENTICATED THOSE DOCUMENTS WITHIN THAT DECLARATION.

DEFENDANT DID HAVE THE OPPORTUNITY TO RESPOND OR OBJECT TO THOSE THROUGH THEIR BRIEFING, AND WE BELIEVE THOSE SHOULD BE ALLOWED IN AT THIS TIME.

WE ALSO WOULD MOVE FOR THE ADMISSION OF ALL OF PLAINTIFFS' DECLARATION, INCLUDING THE DECLARATIONS OF JAMES BLACK, BISHOP MCINTYRE, AND DOE FOSTER MOTHER NUMBER 1.

MR. FIELD: YOUR HONOR, WE WOULD OPPOSE BOTH OF THOSE MOTIONS. THERE IS AN OPPORTUNITY HERE TO INTRODUCE DOCUMENTS, AND OBTAIN TESTIMONY FROM JIM AMATO REGARDING ANY MATTERS THAT PLAINTIFFS BELIEVE RELEVANT TO THIS, AND WE HAVE ALREADY OPPOSED THE INTRODUCTION AND TRIAL OF THIS BY AFFIDAVIT IN THE INTRODUCTION OF AFFIDAVITS OF WITNESSES WHO ARE NOT PRESENT AT THIS HEARING.

MS. WINDHAM: YOUR HONOR, WITH REGARD TO DOE FOSTER MOTHER NUMBER 1, DEFENDANTS DID NOT OBJECT TO THE ADMISSION OF HER TESTIMONY YESTERDAY. SHE WAS ACTUALLY HERE YESTERDAY. AND WE UNDERSTOOD THAT THEY WERE PLANNING TO OBJECT TO THE ADMISSION OF HER DECLARATION IF WE WOULD HAVE HAD HER ON THE STAND. SHE WAS NOT ABLE TO GO HERE TODAY. WE ASKED HER TO BE HERE TODAY.

SO WE FEEL THAT THIS WOULD BE AN UNFAIR BAIT AND SWITCH BY THE DEFENDANTS, AND NOW THAT SHE IS NOT HERE, MOVE TO EXCLUDE HER WHEN THEY DID NOT MOVE SO YESTERDAY.

MR. FIELD: YOUR HONOR, I DON'T BELIEVE DEFENDANT'S MOTION YESTERDAY TO EXCLUDE THE AFFIDAVITS -- AFFIDAVITS OF WITNESSES WHOSE TESTIMONY WAS NOT TAKEN WAS AT ALL AMBIGUOUS. IT WAS ACROSS ALL OF THE EVIDENCE THAT PLAINTIFFS WISH TO INTRODUCE IN THIS HEARING.

MS. WINDHAM: YOUR HONOR, YESTERDAY THEY SPECIFICALLY LISTED JAMES AMATO, JAMES BLACK, AND BISHOP MCINTYRE. THEY DID NOT MENTION FOSTER MOTHER NUMBER 1. WE WOULD HAVE PUT HER ON THE STAND, IF WE HAD KNOWN.

MR. FIELD: YOUR HONOR, THOSE WERE EXAMPLES OF AFFIANTS THAT THEY WERE NOT INTRODUCING.

THE COURT: SINCE DOE FOSTER MOTHER NUMBER 1 WAS PRESENT YESTERDAY, AND COULD NOT BE PRESENT TODAY, I'M GOING TO PERMIT THE AFFIDAVIT. HOWEVER, THE OTHER EXHIBITS, I'M NOT GOING TO PERMIT.

MS. WINDHAM: YOUR HONOR, TO CLARIFY, ARE YOU SPEAKING ABOUT THE OTHER AFFIDAVITS, OR ARE YOU SPEAKING --

THE COURT: EXHIBITS AND THE AFFIDAVITS. THE EXHIBITS, MY UNDERSTANDING IS THEY WERE ATTACHED TO THE AFFIDAVIT OF MR. AMATO, WHO HAS TESTIFIED HERE TODAY.

MS. WINDHAM: YES, YOUR HONOR. THOSE WERE ATTACHED TO HIS DECLARATION, AND THEY WERE PROPERLY AUTHENTICATED IN HIS DECLARATION. WE DID NOT WALK THROUGH AND INTRODUCE EVERY SINGLE ONE OF THOSE TODAY IN ORDER TO SAVE TIME.

THE COURT: WELL, TIME IS NOT A PROBLEM. IF YOU WANT TO HAVE THEM ADMITTED, THEN YOU NEED TO DO IT SINCE MR. AMATO IS HERE.

MS. WINDHAM: YOUR HONOR, MAY WE HAVE A QUICK RECESS TO LOOK AT THOSE DOCUMENTS AND DETERMINE WHICH WE NEED TO ADMIT?

THE COURT: OKAY. YOU CAN HAVE DISCUSSION WITH COUNSEL.

(BRIEF RECESS.)

THE COURT: ARE WE READY?

MS. CORTES: JUST ONE MORE MOMENT, YOUR HONOR.

MR. FIELD: YOUR HONOR, CAN WE APPROACH FOR SIDEBAR CONCERNING THIS MATTER?

THE COURT: YES.

(SIDEBAR OCCURRED.)

MS. BARCLAY: WE CAN TELL YOU WHICH ATTACHMENTS TO JIM AMATO'S DECLARATION WE HAVE AGREED TO, YOUR HONOR. IT IS ATTACHMENT B, ATTACHMENT C.

THE COURT: B, C?

MS. BARCLAY: B AS IN BOY, C AS IN CAT, D AS IN DOG, AND ATTACHMENT I AS IN IGLOO.

THERE ARE SOME ADDITIONAL DOCUMENTS THAT WE WOULD LIKE TO ADMIT. THEY ARE WEBSITE OR NEWS REPORTS THAT ARE FRANKLY JUDICIALLY NOTICEABLE, BUT FOR EASE OF REFERENCE, SO THEY ARE PART OF THE RECORD, WE WOULD LIKE TO ADMIT THEM AS WELL. WOULD YOU LIKE US TO PUT MR. AMATO ON THE STAND FOR THOSE, YOUR HONOR?

MR. FIELD: YOUR HONOR, OUR OBJECTION TO THOSE AND THE REASON I ASKED FOR THE SIDEBAR IS THAT I DON'T THINK WE NECESSARILY NEED TO DO THIS ON STAND. WE CAN RESOLVE THIS THAT WOULD BE BOTH RELEVANT AND FOUNDATION AS TO MR. AMATO'S ACTUAL KNOWLEDGE OF THOSE DOCUMENTS, AND I LEAVE IT TO THE COURT. I DON'T THINK THEY ARE APPROPRIATE AND RELEVANT TO THIS.

THE COURT: WHAT THEY ARE ARE NEWS REPORTS?

MS. BARCLAY: HERE IS AN EXAMPLE OF ONE REPORT, YOUR HONOR, THE ONE TALKING ABOUT SOME OF MAYOR KENNEY'S COMMENTS WITH REGARD TO THE ARCHDIOCESE THAT ARE RELEVANT TO CONCERNS ABOUT HOSTILITY OF RELIGIOUS OFFICIALS,

AND THESE HAVE ALL BEEN AUTHENTICATED TO THE DECLARATION.

THE COURT: WHETHER THEY ARE RELEVANT, THAT'S CLEARLY AN OPINION PIECE.

MS. BARCLAY: IT DOES HAVE SOME QUOTES FROM HIM.

THE COURT: I AM SURE, BUT IT'S FROM THE PHILADELPHIA MAGAZINE, AND THAT'S AN OPINION PIECE.

MS. BARCLAY: WE WOULD AGREE THAT ALL OF THE AWKWARD WORDS ARE NOT PARTICULARLY RELEVANT. IT IS THE QUOTES THAT THEY HAVE COLLECTED FROM MAYOR KENNEY THAT WE THINK ARE RELEVANT.

MS. CORTES: AND, YOUR HONOR, AGAIN, IT WOULD BE OUR POSITION THAT THAT IS IRRELEVANT TO THESE PROCEEDINGS. IT IS IRRELEVANT TO THIS PARTICULAR MATTER. THIS ARTICLE WAS WRITTEN IN 2015. WE ARE TALKING ABOUT CONTRACT NEGOTIATIONS OF 2018, THREE YEARS LATER.

MR. FIELD: YOUR HONOR, THEY ARE NOT AN AUTHENTICATION, THE QUOTES.

MS. CORTES: OR THE FULL CONTEXT, YOUR HONOR.

MS. BARCLAY: THERE IS ALSO, YOUR HONOR, WEB PAGES THAT WE HAVE BEEN TALKING ABOUT, SOME OF THE SPECIALTIES OF SOME AGENCIES AND PROGRAMS LIKE THE BEHAVIORAL HEALTH SPECIALTY OR THE SPECIAL MEDICAL SPECIALTY THAT ARE RELEVANT TO THE TYPES OF NEEDS AND POPULATIONS THAT FOSTER-CARE AGENCIES SERVE AND WE BELIEVE THAT ALSO WOULD BE

RELEVANT TO THESE PROCEEDINGS.

THE COURT: WELL, YOU HAVE TESTIMONY IN THAT REGARD.

MS. BARCLAY: WE CAN, YOUR HONOR.

THE COURT: I MEAN, YOU HAVE ALREADY HAD TESTIMONY.

MS. BARCLAY: I SEE.

THE COURT: WE HAVE HAD MORE THAN ENOUGH TESTIMONY AS FAR AS THE SPECIALIZATION.

MR. RIENZI: YOUR HONOR, MAY I MAKE A SUGGESTION? ONE POSSIBILITY WOULD BE THESE ARE ITEMS THAT -- YOU KNOW, THEY ARE WEBSITES AND NEWS ARTICLES THAT I AM SURE YOU HAVE HAD LITIGANTS CITE TO YOU IN BRIEFS AND THINGS LIKE THAT AND ASK YOU TO TAKE JUDICIAL NOTICE OF ANYWAY. ONE POSSIBILITY WOULD BE YOU DON'T NECESSARILY NEED TO RULE EITHER WAY ON WHETHER THEY COME NOW. PEOPLE CAN JUST MAKE ARGUMENTS FROM THEM AND YOU CAN DO WITH THEM WHAT YOU WILL, WHICH OF COURSE IS YOUR PREROGATIVE ANYWAY. IT SEEMS LIKE IT WOULD BE UNNECESSARY AND WASTEFUL OF COURT TIME TO PUT HIM BACK ON THE STAND TO HAVE HIM SAY STUFF THAT EVERYBODY KNOWS WHAT HE IS GOING TO SAY JUST TO DRAW A RULING OR YOUR CONSIDERATION.

MS. CORTES: YOUR HONOR, WE WOULD AGREE WITH THAT PART. WE DON'T THINK IT IS NECESSARY FOR HIM TO GO ON THE STAND. AGAIN, OUR OBJECTIONS ARE MORE SO TO THE

RELEVANCE AS TO THE VARIOUS WEBSITES OF THE DIFFERENT SPECIALTY NEEDS. I WOULD AGREE WITH YOUR HONOR THAT THERE HAS BEEN PLENTY OF TESTIMONY ON THAT. I THINK THE OBJECTION IS MORE SO THAT THEY ARE DUPLICATIVE OF THE TESTIMONY THAT YOUR HONOR HAS ALREADY TAKEN NOTICE OF.

AS TO THE ARTICLES REGARDING MAYOR KENNEY'S WORDS REGARDING THE ARCHDIOCESE, IT'S OUR POSITION THAT THOSE ARE IRRELEVANT.

MR. RIENZI: WE WOULD STRONGLY DISAGREE AS TO THE RELEVANCE OF MAYOR KENNEY'S STATEMENTS ABOUT THE ARCHDIOCESE, AND AS TO WHETHER OR NOT SOME OF THEM ARE DUPLICATIVE, I WOULD SIMPLY SAY I CAN'T SEE OR IMAGINE ANY HARM FOR THE COURT OR ANYBODY ELSE TO SIMPLY LETTING THEM IN.

MS. BARCLAY: AND THERE'S ANOTHER ARTICLE WE CAN PRESENT THAT I BELIEVE IS THIS YEAR, ONE OF THOSE ARTICLES SO IN AS FAR AS THE CONCERN IS ABOUT THE TIMELINE, AND GIVEN MR. AMATO'S TESTIMONY TODAY, THAT HE WAS TOLD BY DHS OFFICIALS THAT THIS HAD THE EYES OF THE TOP OFFICIALS IN THE CITY, THIS ISSUE, WE THINK THAT MAYOR KENNEY'S COMMENTS ARE RELEVANT TO THE TYPE OF MOTIVATION AND HOSTILITY, IF ANY AT ISSUE IN THIS CASE, REGARDING CATHOLIC SOCIAL SERVICES RELIGIOUS BELIEFS.

THE COURT: I AM NOT GOING TO PERMIT IT. I DON'T THINK IT'S RELEVANT. I DON'T THINK IT'S ADMISSIBLE.

IT IS AN OPINION PIECE, IT'S SOMEBODY'S OPINION. THE INTERPRETATION IS SOMEBODY ELSE'S INTERPRETATION. AND SO I'M NOT GOING TO PERMIT THE ARTICLE.

AS FAR AS THE SPECIALIZATION, HE HAS ALREADY TESTIFIED TO THAT AND I DON'T THINK YOU WILL BE PREJUDICED AS NECESSARY TO BRING IN THE ARTICLES.

MS. BARCLAY: THANK YOU, YOUR HONOR.

MR. RIENZI: THANK YOU, YOUR HONOR.

MR. FIELD: THANK YOU, YOUR HONOR.

(SIDEBAR CONCLUDED.)

THE COURT: OKAY. DOES THE PLAINTIFF REST?

MS. WINDHAM: YES, YOUR HONOR, PLAINTIFFS REST.

THE COURT: OKAY. DOES THE CITY HAVE ANY WITNESSES?

MS. OLIVER: YES, YOUR HONOR. AT THIS TIME I CALL KIMBERLY ALI.

MS. ALI.

THE COURT: OKAY.

MS. OLIVER: THANK YOU, YOUR HONOR.

BY MS. OLIVER:

Q. MS. ALI, YOU HEARD THE TESTIMONY OF MR. AMATO TODAY WHEREIN HE INDICATED THAT DOE FOSTER CHILD NUMBER 1, FORMER FOSTER PARENT, DOE FOSTER PARENT NUMBER 1 DESIRED TO HAVE HIM BACK IN HER CARE?

A. YES.
Q. FIRST OF ALL, WOULD YOU INFORM THE COURT, AS TO YOUR KNOWLEDGE, WHY DOE FOSTER CHILD NUMBER 1 WAS REMOVED FROM DOE FOSTER PARENT NUMBER 1'S CARE?
A. YES, DOE FOSTER CHILD NUMBER 1 WAS REMOVED FROM DOE FOSTER MOTHER NUMBER 1'S HOME BECAUSE THE FOSTER PARENT DID NOT WANT TO ADOPT DOE FOSTER CHILD NUMBER 1, SO HE WAS MOVED --
MS. BARCLAY: OBJECTION TO SPECULATION, YOUR HONOR.
THE COURT: ON WHAT DO YOU BASE THIS?
THE WITNESS: I BASE THAT ON TELEPHONE CONVERSATIONS WITH THE CUA CASE MANAGER, THE CATHOLIC SOCIAL SERVICES CUA CASE MANAGER.
MS. BARCLAY: OBJECTION AS TO HEARSAY, YOUR HONOR.
THE COURT: OVERRULED.
BY MS. OLIVER:
Q. AND WHEN DID YOU LEARN THAT DOE FOSTER MOTHER NUMBER 1 DESIRED TO HAVE DOE FOSTER CHILD RETURNED TO HER CARE?
A. I LEARNED THAT ON THE EVENING OF MAY 25TH AT APPROXIMATELY 10:16 P.M.
Q. 2018?
A. YES.

Q. AND HOW DID YOU LEARN THAT?

A. I LEARNED THAT VIA A TEXT FROM JIM BLACK.

MS. OLIVER: YOUR HONOR, MAY I APPROACH THE WITNESS?

THE COURT: YES.

MS. OLIVER: YOUR HONOR, I HAVE HANDED THE WITNESS WHAT HAS BEEN MARKED AS DEFENSE EXHIBIT NUMBER 5. FOR THE COURT'S INFORMATION, WE FILED AN UNREDACTED COPY UNDER SEAL, AND I HAVE HANDED THE WITNESS A REDACTED COPY FOR THE PURPOSE OF TODAY'S HEARING.

THE COURT: YES.

BY MS. OLIVER:

Q. MS. ALI, WILL YOU PLEASE TAKE A LOOK AT THIS EXHIBIT?

A. YES.

Q. DO YOU RECOGNIZE IT?

A. YES.

Q. WHAT IS IT?

A. IT'S A TEXT MESSAGE BETWEEN JIM BLACK AND MYSELF.

Q. I WOULDN'T HAVE YOU READ THE EXHIBIT IN ITS ENTIRETY, BUT WITH RESPECT TO PAGE 1, WILL YOU PLEASE READ THE CONTENT OF THAT TEXT INTO THE RECORD?

A. "FRIDAY, MAY 25TH, 10:16 P.M. HI KIM, SORRY TO BOTHER YOU ON A FRIDAY NIGHT OF A HOLIDAY WEEKEND, BUT

WE HAVE A BOY WHO WAS MOVED EARLIER THIS MONTH FROM ONE OF CSS FOSTER HOMES TO A PREADOPTIVE HOME OF ANOTHER AGENCY. FOR SOME REASON THE PLACEMENT HAS NOT WORKED OUT, AND CUA 4 CONTACTED OUR FOSTER MOTHER WHO WILL TAKE THE CHILD BACK. BUT DHS SUPPOSEDLY JUST TOLD THE CASE MANAGER THE CHILD COULD NOT GO BACK TO OUR HOME. WANTING TO DO THE BEST THING FOR THE CHILD OF COURSE. I'LL FOLLOW YOUR LEAD."

Q. AND DID YOU SEND A REPLY TO THAT TEXT MESSAGE TO MR. BLACK?

A. YES, I DID.

Q. AND WHAT WAS THE CONTENT OF YOUR REPLY?

A. WOULD YOU LIKE ME TO READ IT?

Q. PLEASE.

A. "HEY JIM, IS THE PLACEMENT MOVE AN EMERGENCY FOR TONIGHT? IF NOT WE CAN MAKE THE MOVE ON TUESDAY AFTER GETTING THE APPROVAL DUE TO JUDICIAL RULES THAT PLACEMENTS MUST BE APPROVED. ONLY TIME CAN MAKE THE MOVE WITHOUT COURT APPROVAL, AS YOU KNOW, AS IF IT IS AN EMERGENCY. LET ME KNOW."

Q. OKAY. AND FINALLY, DID MR. BLACK REPLY?

A. YES.

Q. PLEASE DIRECT YOUR ATTENTION TO PAGE -- THE THIRD PAGE OF THIS EXHIBIT. AND WHY DON'T YOU READ ONLY AFTER THE SECOND REDACTION WHERE IT BEGINS "BUT THE GOOD

NEWS IS"?

A. THAT WAS FRIDAY, MAY 25TH AT 11:58 P.M. "BUT THE GOOD NEWS IS I JUST LEARNED THAT IS NOW SAFELY IN ANOTHER DEVEREUX FOSTER HOME, SO NO NEED TO INVOLVE CSS FOSTER CHILD 1. SORRY TO HAVE BOTHERED YOU. I REALLY APPRECIATE YOUR HELP. HAVE A TERRIFIC HOLIDAY. JIM."

Q. THANK YOU. AND SUBSEQUENT TO HAVING THIS CORRESPONDENCE WITH MR. BLACK, DID IT THEN COME TO YOUR ATTENTION THAT DOE FOSTER CHILD 1 NEEDED TO BE REMOVED FROM THE DEVEREUX FOSTER HOME?

A. NO. PRIOR TO JIM BLACK'S OUTREACH IS THE QUESTION? WHAT IS THE QUESTION?

Q. NO. MY QUESTION IS IN THIS TEXT MESSAGE, ISN'T IT CORRECT THAT MR. BLACK INDICATED THAT NO NEED TO INCLUDE CSS IN THIS ISSUE ANYMORE. IT'S BEEN RESOLVED ESSENTIALLY?

A. YES.

Q. BUT DID YOU THEN COME TO LEARN THAT THE CHILD NEEDED TO MOVE FROM THE DEVEREUX FOSTER HOME, WHERE HE WAS?

A. HE WAS MOVED FROM THE DEVEREUX FOSTER HOME INTO A RESPITE HOME, WHERE HE HAS REMAINED EVER SINCE.

Q. DID IT COME TO YOUR ATTENTION AGAIN THAT DOE FOSTER MOTHER NUMBER 1 ONCE AGAIN DESIRED TO HAVE THE CHILD RETURNED TO HER CARE?

A. YES.
Q. AND HOW DID THAT COME TO YOUR ATTENTION?
A. THAT CAME TO MY ATTENTION ON JUNE 5TH AFTER A CONVERSATION THAT I HAD WITH FIRST DEPUTY COMMISSIONER SHAPIRO.
Q. OKAY. AND ESSENTIALLY WHAT WAS THE SUBSTANCE OF THAT CONVERSATION?
A. THE SUBSTANCE OF THE CONVERSATION WAS THAT SHE WAS BRINGING ME UP TO SPEED IN REFERENCE TO THE LITIGATION, THE PENDING LITIGATION, SHE TOLD ME THE SCENARIO, AND I TOLD HER --
MS. BARCLAY: OBJECTION AS TO HEARSAY, YOUR HONOR.
THE COURT: WELL, SHE SAID -- SHE DIDN'T SAY WHAT SHE TOLD HER. SHE BROUGHT HER UP TO SPEED.
AND AS A RESULT OF WHAT SHE SAID, WHAT DID YOU DO?
THE WITNESS: I TOLD HER THAT I WAS FAMILIAR -- I THOUGHT THAT I WAS FAMILIAR WITH DOE FOSTER CHILD NUMBER 1.
BY MS. OLIVER:
Q. AND DID YOU -- ULTIMATELY, WAS DOE FOSTER CHILD NUMBER 1 RETURNED TO -- STRIKE THAT.
ULTIMATELY, WAS DOE FOSTER CHILD NUMBER 1 RETURNED TO DOE FOSTER MOTHER 1'S CARE?

A. YES.

Q. HOW DID THAT COME ABOUT?

A. THAT CAME ABOUT ON JUNE 7TH. I HAD A CONVERSATION WITH THE CUA CASE MANAGEMENT TEAM. I SPOKE TO THE CUA CASE MANAGER, THE CUA SUPERVISOR, THE CUA CASE DIRECTOR TO GET A BETTER UNDERSTANDING AS TO THE PERMANENCY FOR DOE FOSTER CHILD NUMBER 1 AND THE FOSTER PARENT'S WILLINGNESS NOW TO ADOPT DOE FOSTER CHILD NUMBER 1.

AFTER I SPOKE TO THE CUA CASE MANAGEMENT TEAM LATER ON IN THE AFTERNOON, I HAD A CONVERSATION WITH DOE FOSTER PARENT NUMBER 1, AS WELL AS COUNSEL FOR DOE FOSTER PARENT NUMBER 1, MRS. BARCLAY, TO GET A SENSE OF HER COMMITMENT IN REFERENCE TO THE PERMANENCY AND ADOPTION OF DOE FOSTER CHILD NUMBER 1.

Q. OKAY.

A. AFTER HEARING BOTH SIDES, I FELT THAT IT WAS IN THE BEST INTEREST TO PLACE DOE FOSTER CHILD NUMBER 1 BACK INTO THE HOME OF DOE FOSTER MOTHER NUMBER 1. HOWEVER, I EXPLAINED TO BOTH THE CUA CASE MANAGEMENT TEAM, AS WELL AS DOE FOSTER PARENT NUMBER 1, THAT WE NEEDED TO GET JUDICIAL APPROVAL BECAUSE THIS WAS NOT AN EMERGENCY MOVE, THEREFORE, THE COURT WOULD HAVE TO APPROVE THE MOVE.

Q. AND TO YOUR KNOWLEDGE, DID THE COURT ULTIMATELY

SIGN AN ORDER AUTHORIZING THE CHILD TO RETURN TO DOE FOSTER MOTHER NUMBER 1'S CARE?

A. YES.

Q. DO YOU RECALL WHAT DATE THAT OCCURRED?

A. JUNE 12TH.

Q. 2018?

A. YES.

Q. AND THAT WAS THE DATE THAT THE COURT SIGNED THE ORDER?

A. YES.

Q. AND THE CHILD RETURNED TO HER CARE ON THAT DATE?

A. YES.

Q. OKAY. AND JUST BRIEFLY, ONE OTHER THING. IN HIS TEXT MESSAGE, MR. BLACK INDICATED THAT -- AND AGAIN, I QUOTE: "BUT DHS SUPPOSEDLY JUST TOLD THE CASE MANAGER THE CHILD COULD NOT GO BACK TO OUR HOME."

DID YOU HAVE AN OPPORTUNITY TO VERIFY THAT? DID YOU HAVE ANY CONVERSATION WITH THE CATHOLIC CUA CASE MANAGER?

A. YES, I TALKED TO THE CATHOLIC CUA CASE MANAGER, MR. WHITMAN, ABOUT --

MS. BARCLAY: OBJECTION AS TO HEARSAY.

THE COURT: OVERRULED.

THE WITNESS: -- ABOUT WHAT HAPPENED THE EVENING OF MAY 25TH. NUMBER ONE, WHO DID HE SPEAK TO AT

DHS? HE INDICATED THAT HE COULD NOT REMEMBER, HOWEVER, IT WAS A FEMALE THAT HE SPOKE TO. I ASKED HIM THE CONVERSATION THAT HE HAD, AND HE INDICATED TO ME THAT THE DHS STAFF PERSON TOLD HIM THAT SHE WOULD HAVE TO GET APPROVAL IN ORDER TO PLACE DOE FOSTER CHILD NUMBER 1 BACK INTO THE HOME OF DOE FOSTER CHILD NUMBER 2.

HE INDICATED THAT HE COMMUNICATED THAT INFORMATION TO DOE FOSTER PARENT NUMBER 1, THAT APPROVAL NEEDED TO OCCUR BEFORE THE FOSTER CHILD COULD BE PLACED BACK IN HER HOME.

MS. OLIVER: THANK YOU, MS. ALI.

YOUR HONOR, I HAVE NO FURTHER QUESTIONS.

THE COURT: ANY CROSS-EXAMINATION?

MS. BARCLAY: YES, YOUR HONOR, VERY BRIEFLY.

CROSS-EXAMINATION

BY MS. BARCLAY:

Q. GOOD AFTERNOON, MS. ALI.

A. GOOD AFTERNOON.

Q. ON MAY 25TH, DID ANYONE FROM DHS COMMUNICATE TO YOU THE NEED FOR THAT APPROVAL THAT YOU DISCUSSED ON YOUR DIRECT EXAMINATION?

A. NO.

Q. NOW, WHEN DID -- THE ADDITIONAL ISSUES ABOUT DOE FOSTER PARENT NUMBER 1 AND DOE FOSTER CHILD NUMBER 1, WHEN WERE THOSE COMMUNICATED TO YOUR ATTORNEYS?

A. I'M NOT SURE. I WAS ACTUALLY ON VACATION OR RETURNING BACK FROM VACATION ON JUNE THE 5TH.

MS. BARCLAY: YOUR HONOR, MAY I HAVE PERMISSION TO APPROACH THE WITNESS?

THE COURT: YES.

MS. BARCLAY: THIS IS 3E OF THE DEFENDANT'S FILING.

BY MS. BARCLAY:

Q. CAN YOU TURN WITH ME TO THE BACK OF THIS DOCUMENT, THE VERY FIRST E-MAIL ON THE CHAIN, PAGE 7.

HAVE YOU EVER SEEN THIS E-MAIL FROM MS. WINDHAM TO MR. BENJAMIN FIELD?

A. YES.

Q. WHAT IS THE DATE OF THIS E-MAIL?

A. FRIDAY, JUNE 1ST, 2018, AT 9:14 P.M.

Q. AND THIS IS THE E-MAIL THAT I WILL FIRST BE BRINGING TO YOUR ATTENTION, TO DHS'S ATTENTION SOME OF THESE ADDITIONAL FACTS ABOUT DOE FOSTER PARENT NUMBER 1 AND DOE FOSTER CHILD NUMBER 1, CORRECT?

MS. OLIVER: OBJECTION, YOUR HONOR, IN THAT THIS DOCUMENT WAS SENT TO MR. FIELD FROM MS. WINDHAM.

BY MS. BARCLAY:

Q. MS. ALI, DID YOU -- YOU SAID YOU WERE FAMILIAR WITH THIS E-MAIL.

IS THIS E-MAIL THE WAY THAT YOU LEARNED

ABOUT ADDITIONAL FACTS FROM DOE FOSTER CHILD NUMBER 1 AND DOE FOSTER MOTHER NUMBER 1?

A. NO. I LEARNED ABOUT THE ADDITIONAL FACTS BY WAY OF OUR CONVERSATION WITH FIRST DEPUTY COMMISSIONER SHAPIRO ON JUNE THE 5TH.

Q. OKAY. WAS SHE RELAYING HER UNDERSTANDING ABOUT THAT CORRESPONDENCE ON JUNE THE 5TH, IS THAT YOUR TESTIMONY?

MS. OLIVER: OBJECTION. CALLS FOR SPECULATION.

THE COURT: I DON'T KNOW HOW SHE CAN ANSWER THAT. SUSTAINED.

BY MS. BARCLAY:

Q. DO YOU KNOW WHAT THE BASIS WAS FOR DEPUTY COMMISSIONER SHAPIRO'S INFORMATION ABOUT DOE FOSTER MOTHER NUMBER 1?

A. I DON'T KNOW THE BASIS.

Q. YOU DON'T KNOW THE BASIS FOR HER?

A. NO.

Q. WHEN YOU SPOKE WITH MR. BLACK ON MAY 25TH, YOU KNEW THAT HE WAS -- HE DID NOT KNOW THE SPECIFICS OF THE CASE, RIGHT?

A. HE KNEW SOME SPECIFICS OF THE CASE IN THAT HIS TEXT SAID THAT HE WAS MOVED EARLIER THIS MONTH FROM ONE OF CSS'S FOSTER HOMES TO A PREADOPTIVE HOME FROM ANOTHER

AGENCY; THAT THE PLACEMENT HAS NOT WORKED OUT; THAT CUA 4 CONTACTED OUR FOSTER MOTHER WHO WOULD TAKE THE CHILD BACK. SO HE KNEW SOME INFORMATION.

MS. BARCLAY: YOUR HONOR, PERMISSION TO APPROACH THE WITNESS.

THE COURT: YES.

MS. BARCLAY: AND THIS IS HER DECLARATION.

BY MS. BARCLAY:

Q. MS. ALI, I AM READING FROM YOUR DECLARATION, IF YOU TURN TO PAGE 11.

ON PARAGRAPH 52, THIS BEGINS YOUR CONVERSATION THAT BEGAN FRIDAY, MAY 25TH AT 10:16 P.M., CORRECT?

A. YES.

Q. AND ON PARAGRAPH 55, YOU SAID: "I SUBSEQUENTLY CALLED HIM TO DISCUSS WHETHER IT WAS AN EMERGENCY, AND HE DID NOT KNOW THE SPECIFICS OF THE CASE."

DID I READ THAT CORRECTLY?

A. YES.

Q. MS. ALI, YOU ALSO HAD DETERMINED THAT IT WAS IN THE BEST INTEREST OF DOE FOSTER CHILD NUMBER 1 TO BE PLACED WITH DOE FOSTER MOTHER NUMBER 1, CORRECT?

A. YES.

Q. AND THE JUDGE MADE THAT DETERMINATION AS WELL?

A. YES.

Q. AND IF IT WEREN'T FOR THE REFERRAL STOPPAGE THAT YOU PLACED, HE WOULDN'T HAVE BEEN PLACED WITH DOE FOSTER MOTHER NUMBER 1 ON THE EVENING OF THE 25TH, CORRECT?

MS. OLIVER: OBJECTION. CALLS FOR SPECULATION.

THE COURT: OVERRULED.

YOU CAN ANSWER.

THE WITNESS: NO.

BY MS. BARCLAY:

Q. HE WOULD NOT HAVE BEEN PLACED WITH THE PLACEMENT IN HIS BEST INTEREST WHERE THERE IS AN EMERGENCY SITUATION?

A. ON MAY THE 25TH WHEN I SPOKE TO JIM, HE COULD NOT ANSWER WHETHER OR NOT IT WAS AN EMERGENCY MOVE OR NOT.

Q. I'M TALKING ABOUT BEFORE YOU SPOKE TO JIM, BECAUSE YOU WOULD NOT HAVE NEEDED TO GET INVOLVED OR SPEAK TO JIM AT ALL IF THE PLACEMENT HAD NOT ALREADY BEEN DENIED AT THAT POINT, CORRECT?

MS. OLIVER: OBJECTION, YOUR HONOR. THE QUESTION CALLS FOR SPECULATION.

MS. BARCLAY: IT DOES NOT CALL FOR SPECULATION, YOUR HONOR. THOSE ARE FACTS THAT ARE ALREADY IN EVIDENCE.

THE COURT: CAN YOU ANSWER THE QUESTION?

THE WITNESS: CAN YOU REPEAT IT.

BY MS. BARCLAY:

Q. BY THE TIME YOU SPOKE TO MR. BLACK, THE -- HE WAS COMMUNICATING WITH YOU BECAUSE THE PLACEMENT BY THE CUA WORKER HAD ALREADY BEEN DENIED, CORRECT?

A. MR. BLACK'S TEXT SAYS, "DHS SUPPOSEDLY."

Q. AND SO IF DHS HAD NOT DENIED THE PLACEMENT AND SAID THAT, QUOTE: "THE CASE MANAGER" -- "JUST TOLD THE CASE MANAGER THE CHILD COULD NOT GO BACK TO OUR HOME," IF THAT HAD NOT HAVE HAPPENED, JAMES BLACK WOULD NOT HAVE BEEN TEXTING YOU AT ALL THAT EVENING, WOULD HE?

MS. OLIVER: YOUR HONOR, OBJECTION, BASED ON SPECULATION.

THE COURT: SUSTAINED.

BY MS. BARCLAY:

Q. MR. BLACK WAS TEXTING YOU BECAUSE A DENIAL HAD HAPPENED ACCORDING TO HIS TEXT MESSAGE TO YOU, CORRECT?

MS. OLIVER: OBJECTION.

THE COURT: OVERRULED.

THE WITNESS: REPEAT IT AGAIN, I'M SORRY.

BY MS. BARCLAY:

Q. MR. BLACK WAS TEXTING YOU THAT EVENING BECAUSE DHS HAD DENIED THE CHILD BEING SENT BACK TO THE CATHOLIC SOCIAL SERVICES HOME, CORRECT?

MS. OLIVER: OBJECTION. THAT'S A

MISCHARACTERIZATION. THE TEXT SAYS "SUPPOSEDLY."

THE COURT: WELL, IF SHE KNOWS.

THE WITNESS: HE SAID, "DHS SUPPOSEDLY," SO I WENT BY THE BASIS OF HIS TEXT.

BY MS. BARCLAY:

Q. AND SO HE IS ONLY TEXTING YOU BECAUSE HE IS SAYING, QUOTE: "DHS JUST TOLD THE CASE MANAGER THE CHILD COULD NOT GO BACK TO OUR HOME."

DID I READ THAT CORRECTLY?

A. YES, YOU DID.

Q. AND SO IF THAT WAS TRUE AND IF THERE WAS NOT THAT DENIAL, MR. BLACK WOULD NOT HAVE NEEDED TO TEXT YOU ABOUT THAT SITUATION THAT EVENING, WOULD HE?

A. TRUE.

MS. BARCLAY: NO FURTHER QUESTIONS, YOUR HONOR.

THE COURT: ANY OTHER QUESTIONS?

MS. OLIVER: NO, YOUR HONOR.

THE COURT: OKAY. THANK YOU.

MS. CORTES: YOUR HONOR, CAN WE SEE YOU BRIEFLY AT SIDEBAR?

THE COURT: OKAY.

(SIDEBAR OCCURRED.)

MS. CORTES: YOUR HONOR, WE HAVE TWO MORE WITNESSES. I UNDERSTAND FROM YOUR LAW CLERK THAT HE SAID

THAT YOU WOULD BE WILLING TO GO UNTIL 5:30. HOWEVER, GIVEN THAT THERE ARE TWO WITNESSES AND I DON'T THINK THAT EITHER OF THEM WILL BE ABLE TO FINISH.

MR. FIELD: IF NEXT WITNESS WOULD BE COMMISSIONER FIGUEROA, WE WOULD DO OUR BEST TO BE FOCUSED, BUT IT'S A SUBSTANTIAL AMOUNT OF TESTIMONY.

THE COURT: WELL, YOU CAN DO THE DIRECT. THAT WOULD BE GOOD TO GET IT STARTED.

MS. BARCLAY: YOUR HONOR, MS. WINDHAM HAS A PLANE TICKET PURCHASED TO LEAVE TOMORROW MORNING AND WE JUST ARE NOT IN A POSITION FOR THIS TO CONTINUE AGAIN UNTIL TOMORROW.

THE COURT: WELL, I DON'T KNOW HOW LONG YOU WANT ME TO STAY, BUT...

MS. CORTES: THERE IS NO WAY FOR US TO FINISH.

MS. BARCLAY: CAN WE DISCUSS IT?

MR. RIENZI: YOUR HONOR, IF WE CONTINUE TOMORROW, WHAT TIME TOMORROW?

THE COURT: IN THE MORNING.

THE LAW CLERK: ACTUALLY, JUDGE, YOU ARE BOOKED UP FULLY TOMORROW.

THE COURT: SO IT WOULD BE THURSDAY.

MS. WINDHAM: AND I APOLOGIZE, YOUR HONOR, THIS IS A TRIP THAT I BOOKED BEFORE THIS CASE EVEN AROSE. I

DID NOT REALIZE THIS CASE MIGHT BLEED INTO A THIRD DAY.

THE COURT: OKAY. WELL, LET'S GET STARTED.

MR. FIELD: THANK YOU, YOUR HONOR.

(SIDEBAR CONCLUDED.)

THE COURT: OKAY. WELL, LET'S GET STARTED.

MR. FIELD: THANK YOU, YOUR HONOR.

THE COURT: CITY, CALL YOUR NEXT WITNESS.

MR. FIELD: THE CITY CALLS CYNTHIA FIGUEROA TO THE STAND.

(WITNESS SWORN.)

THE WITNESS: CYNTHIA FIGUEROA, FIRST NAME IS C-Y-N-T-H-I-A. LAST NAME FIGUEROA, F-I-G-U-E-R-O-A.

MR. FIELD: YOUR HONOR, MAY WE CLEAN UP THE EXHIBITS THAT ARE FROM PRIOR WITNESSES?

THE COURT: YES.

DIRECT EXAMINATION

BY MR. FIELD:

Q. COMMISSIONER FIGUEROA, THANK YOU FOR BEING HERE TODAY.

CAN YOU JUST STATE YOUR CURRENT POSITION WITH THE CITY?

A. I AM THE COMMISSIONER OF THE DEPARTMENT OF HUMAN SERVICES FOR PHILADELPHIA.

Q. THANK YOU.

AND BEFORE WE GET INTO THE MEAT OF THIS

CASE, I WANT TO START BY HAVING YOU TELL US A LITTLE BIT ABOUT YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND AND HOW YOU CAME TO THE POSITION YOU ARE CURRENTLY IN.

WHERE DID YOU GO TO COLLEGE?

A. I WENT TO SPRING HILL COLLEGE. IT'S THE THIRD OLDEST JESUIT INSTITUTION IN THE NATION.

Q. AND WHEN DID YOU GRADUATE FROM SPRING HILL?

A. I GRADUATED IN 1995.

Q. WHERE WAS SPRING HILL?

A. IT'S IN MOBILE, ALABAMA.

Q. WHAT DID YOU DO TO START YOUR CAREER AFTER GRADUATION?

A. CERTAINLY. SO I WAS JUST BY THE NATURE OF MY FAMILY HISTORY, WE ARE FIRST GENERATION -- FIRST GENERATION IMMIGRANTS. SOCIAL JUSTICE WAS A BIG CALL, AND A HUGE REASON WHY MY PARENTS WERE VERY INTERESTED IN MAKING SURE THAT I PURSUED AN EDUCATION, AND REALLY LOOKED VERY FONDLY ON THE JESUIT EDUCATION.

SO THROUGH COLLEGE I DID THE JESUIT VOLUNTEER CORP, WHERE I WORKED IN DETROIT, MICHIGAN, IN A DOMESTIC VIOLENCE SHELTER, AND I ALSO WORKED WITH WOMEN WHO WERE INCARCERATED, WHO WERE UP FOR PAROLE.

Q. AND WHERE DID YOU GO AFTER THAT POSITION?

A. SO I THEN MOVED TO PHILADELPHIA, AND I HAVE HAD OVER A 20-YEAR CAREER WORKING IN SOCIAL SERVICES WITH

WOMEN AND CHILDREN, MOSTLY SUPPORTING THE NEEDS AND RIGHTS OF CHILDREN AND FAMILIES.

Q. BRIEFLY -- AND WE DON'T NEED TO SPEND A LOT OF TIME -- WHAT ARE SOME OF THE ORGANIZATIONS YOU'VE WORKED WITH AND POSITIONS YOU'VE HELD?

A. SURE. SO MY FIRST JOB IN PHILADELPHIA WAS CONGRESSO DE LATINOS UNIDAS. I THEN WORKED AT WOMEN AGAINST ABUSE. I HAD THE HONOR OF SERVING IN THE MAYOR NUTTER'S ADMINISTRATION AS THE DEPUTY COMMISSIONER OF THE DEPARTMENT OF HUMAN SERVICES. I WAS THERE FOR A TIME BEFORE I BECAME THE CEO OF CONGRESSO DE LATINOS UNIDAS, AND THEN SUBSEQUENTLY, MOST RECENTLY, WAS APPOINTED TO SERVE AS COMMISSIONER OF THE DEPARTMENT OF HUMAN SERVICES.

Q. AND WERE SOME OF THOSE JOBS, SHALL WE SAY, HANDS-ON WITH THE COMMUNITIES, AND SOME OF THOSE JOBS SUPERVISORY?

A. YES. SO CERTAINLY THE EARLIER PART OF MY CAREER WAS DIRECT CASE MANAGEMENT WORK WITH INDIVIDUALS. EARLY ON WHEN I MOVED TO PHILADELPHIA, I RECOGNIZED THE CAPACITY AND ABILITY TO HANDLE AND DO MORE ADMINISTRATIVE AND LEADERSHIP WORK, BUT A HUGE PORTION OF MY WORK, BOTH AT WOMEN AGAINST ABUSE AND CONGRESSO, WAS DIRECTLY CONNECTED TO WORK IN THE COMMUNITY AND WITH DIRECT CLIENTS.

MY OFFICE WHEN I -- THE MAJORITY OF THE TIME THAT I RAN WOMEN AGAINST ABUSE WAS ACTUALLY IN THE PHYSICAL SHELTER WHERE THE WOMEN AND CHILDREN RESIDED, SO I WAS IN DAILY CONTACT WITH THE WOMEN AND CHILDREN THAT WE SERVED. AT CONGRESSO, A COMMUNITY THAT I SERVED FOR A NUMBER OF YEARS, MY OFFICE WAS LOCATED IN NORTH PHILADELPHIA. I WENT TO COMMUNITY MEETINGS. I PARTICIPATED IN COMMUNITY EVENTS. I FREQUENTED THE BUSINESSES IN NORTH PHILADELPHIA, AND WORKED VERY CLOSELY WITH THE COMMUNITY.

Q. AND YOU MENTIONED HAVING WORKED FOR DHS DURING THE NUTTER ADMINISTRATION?

A. THAT'S CORRECT.

Q. WHEN DID YOU WORK THERE AND WHAT POSITION DID YOU HAVE?

A. SO FROM 2008 TO 2011, I WAS A DEPUTY COMMISSIONER OF PREVENTION.

Q. AND WHAT WERE YOUR RESPONSIBILITIES IN THAT POSITION?

A. SO MY RESPONSIBILITIES WERE TO OVERSEE ALL OF THE PREVENTION SERVICES THAT WERE FOR FAMILIES AND CHILDREN WHO WERE NOT FORMALLY ENGAGED IN THE CHILD WELFARE SYSTEM, SO TRUANCY, DOMESTIC VIOLENCE, AFTER SCHOOL SERVICES, HOUSING SERVICES, AND IN-HOME CASE MANAGEMENT WHERE THERE WASN'T AN ACCEPTOR FOR SERVICES

CASE.

Q. THANK YOU.

SO I WOULD LIKE TO SHIFT AND TALK ABOUT YOUR TIME AT DHS CURRENTLY AND DHS'S AND YOUR -- DHS'S RESPONSIBILITIES AND YOUR RESPONSIBILITIES AS COMMISSIONER.

WHEN DID YOU BECOME COMMISSIONER AT DHS?

A. I WAS APPOINTED IN JULY OF 2017.

Q. WAS THAT APPOINTMENT EFFECTIVE IN JULY, OR DID YOUR TENURE START --

A. MY TENURE STARTED IN SEPTEMBER OF 2016.

Q. IF YOU COULD, AS COMMISSIONER, WHAT DOES DHS DO? WHAT IS ITS MANDATE? WHAT ARE ITS SET OF RESPONSIBILITIES?

A. WELL, IT'S A HUGE JOB WHERE I HAVE HAD A NUMBER OF COUNSELED MEMBERS AND OTHER INDIVIDUALS REMIND ME IT'S PROBABLY THE HARDEST JOB IN THE CITY OF PHILADELPHIA. BUT ON A DAILY BASIS, I AM RESPONSIBLE FOR 1,500 EMPLOYEES, A BUDGET OF WELL OVER 600 MILLION, AND I AM CHARGED AS THE COUNTY ADMINISTRATOR TO OVERSEE THE RESPONSIBILITY OF THE CHILD WELFARE INSTITUTION, SO THE RESPONSIBILITY IS ENSURING THAT WE MEET THE STATE MANDATES, AS WELL AS FEDERAL MANDATES RELATED TO CHILD WELFARE.

Q. AND SO HOW ARE THOSE CHILD WELFARE ACTIVITIES

ORGANIZED WITHIN DHS? WHAT DO THEY CONSIST OF, AND HOW DOES DHS MANAGE THEM?

A. WE HAVE MULTIPLE DIVISIONS, BECAUSE IT IS A VERY LARGE PIECE OF WORK, SO I HAVE DEPUTIES THAT LEAD VARIOUS DIVISIONS IN THE DEPARTMENT. YOU HEARD EARLIER FROM DEPUTY COMMISSIONER ALI. SHE OVERSEES WHAT IS CALLED CHILD WELFARE OPERATIONS, AND THAT'S EVERYTHING FROM THE VERY FRONT END OF OUR SERVICE, FROM THE HOTLINE, INTAKE, AND INVESTIGATION TO THE WORK OF THE UMBRELLA AGENCIES, AS WELL AS THE INVESTIGATION PIECE THAT I MENTIONED, ALL THE WAY THROUGH ADOPTION AND PERMANENCY.

WE ALSO HAVE OTHER DIVISIONS, INCLUDING PREVENTION. WE HAVE A PERFORMANCE MANAGEMENT AND TECHNOLOGY. WE HAVE A FINANCE AND CONTRACT DIVISION. WE HAVE JUVENILE JUSTICE, AND ADMINISTRATION AND MANAGEMENT.

Q. SO THE FOSTER-CARE SERVICES AND FOSTER-CARE CHILDREN THAT ARE AT ISSUE IN THE LITIGATION, WHAT DIVISION DO THOSE FALL UNDER?

A. CHILD WELFARE OPERATIONS.

Q. DOES THAT INCLUDE FOSTER-CARE CHILDREN WHO ARE SINGLE FAMILY PLACEMENTS AND OTHER CHILDREN IN THE CITY'S CUSTODY AS WELL?

A. YES.

Q. CAN YOU EXPLAIN THE FULL MONOPOLY OF CHILDREN YOU HAVE A RESPONSIBILITY THERE FOR, PLEASE?

A. SURE. WHEN WE REFER TO A CHILD BEING IN PLACEMENT, THAT PLACEMENT COULD BE A FOSTER-CARE HOME, A RESOURCE HOME THAT IS KIN, AS WELL AS CONGREGATE, SO THE RESIDENTIAL PLACEMENT.

Q. AND SO HOW MANY CHILDREN OVERALL -- AND I APOLOGIZE IF YOU SAID IT, I AM NOT SURE -- ARE IN FOSTER-CARE IN THE CITY'S CUSTODY?

A. SO CURRENTLY, THERE ARE 6,000 KIDS IN PLACEMENT, AND THERE ARE ABOUT ANOTHER ADDITIONAL 4,000 WHO RECEIVE IN-HOME CASE MANAGEMENT SERVICES WHO ARE CONSIDERED PLACEMENT. SO ON ANY GIVEN DAY, WE HAVE A RESPONSIBILITY OF OVER 10,000 KIDS IN OUR SYSTEM, AND THAT'S NOT INCLUDING THE JUVENILE JUSTICE PART OF THE WORD.

Q. UNDERSTOOD. THANK YOU.

ARE SOME OF THE KIDS PLACED WITH RELATIVES AND SOME OF THOSE KIDS PLACED WITH FOSTER-CARE FAMILIES THEY DON'T PREVIOUSLY HAVE RELATIONSHIPS WITH?

A. YES. SO ONE OF THE THINGS THAT WE HAVE BEEN VERY COMMITTED TO IS FAMILIES FIRST, AND KINSHIP FIRST IS THE NUMBER-ONE PRIORITY, AND THAT'S A WELL-UNDERSTOOD CULTURE NORM IN THE DEPARTMENT. SO I AM HAPPY TO REPORT IN TERMS OF THE PLACEMENT SERVICES THAT ARE HOME-BASED,

SO IF YOU REMOVE THE RESIDENTIAL, OVER 50 PERCENT OF OUR KIDS ARE WITH KIN.

Q. AND ARE YOU ABLE GENERALLY TO GIVE NUMBERS FOR HOW THE REMAINING 50 PERCENT OF THE CHILDREN ARE PLACED?

A. THEY ARE PLACED IN GENERAL FOSTER-CARE. I DON'T HAVE THE BREAKDOWN OF SPECIALIZED.

Q. AND YOU HEARD MS. ALI'S TESTIMONY YESTERDAY REGARDING THE STRUCTURE OF COMMUNITY UMBRELLA AGENCY AND FOSTER-CARE AGENCIES?

A. YES.

Q. TO YOUR UNDERSTANDING, WAS THAT GENERALLY ACCURATE?

A. YES, THAT WAS ACCURATE.

Q. SO CSS FOSTER-CARE AGENCY IS ONE OF HOW MANY FOSTER-CARE AGENCIES IN THE CITY?

A. 30.

Q. APPROXIMATELY HOW MANY CHILDREN, TO YOUR KNOWLEDGE, DO THEY TAKE CARE OF?

A. IN CSS FOSTER-CARE?

Q. CORRECT?

A. I BELIEVE AS OF THIS MONTH IT'S AROUND 107.

Q. SO LET'S SHIFT FOR A MOMENT -- ACTUALLY, LET'S JUST COME BACK. WE WERE TALKING ABOUT THE CHILDREN WHO ARE IN THE CITY'S CUSTODY.

WHEN THEY -- HOW DO THEY FIRST COME INTO

THE CITY'S CUSTODY?

A. SO GENERALLY, THEY COME TO OUR ATTENTION THROUGH THE HOTLINE, AND THERE IS SAFETY DETERMINED ABOUT WHETHER OR NOT THE CHILD CAN REMAIN SAFELY AT HOME. IF NOT, THEN THERE HAS TO BE AN ORDER OF PROTECTIVE CUSTODY AS A RESULT OF THE INVESTIGATION. WE WOULD MAKE A DETERMINATION OF THE PLACEMENT NEEDS OF THAT CHILD BASED ON THE LEVEL OF CARE THAT HAS BEEN DETERMINED BY THE CENTRAL REFERRAL UNIT.

Q. CAN YOU EXPLAIN WHAT THE CENTRAL REFERRAL UNIT IS, AND WHAT IT DOES?

A. SO IT'S APTLY NAMED FOR ITS ROLE THAT IT PLAYS, WHICH IT PLAYS A CENTRAL ROLE IN OUR DEPARTMENT TO MANAGE ANY OF THE PLACEMENT DECISIONS FOR CHILDREN IN THE CHILD WELFARE SYSTEM ON THE DEPENDENCY SIDE.

Q. SO WHEN A CHILD FIRST COMES INTO THE CITY CUSTODY, THE CENTRAL REFERRAL UNIT DOES WHAT?

A. SO THE CENTRAL REFERRAL UNIT WOULD BE ABLE TO DETERMINE THROUGH, AS MS. ALI OUTLINED, THE LEVEL OF CARE TOOL THAT IS USED TO DETERMINE THE BEST AND MOST ACCURATE PLACEMENT FOR THAT YOUTH, AND THEN WE WORK TO DETERMINE WHAT PLACEMENT THAT CHILD WOULD THEN FALL INTO.

Q. AND AS COMMISSIONER, WHAT IS YOUR UNDERSTANDING? WHAT GUIDES THOSE DETERMINATIONS?

A. THERE ARE A HOST OF ISSUES. IF THE CHILD HAS SPECIAL MEDICAL NEEDS, THE CHILD HAS ACUTE INTELLECTUAL DISABILITY ISSUES THAT WE HAVE TO CONSIDER IN PLACEMENT, IF THE CHILD HAS A SIBLING THAT IS ALREADY IN THE SYSTEM, THE AGE OF THE CHILD.

Q. AND WE HAVE HEARD THE TERM THROUGHOUT THE PAST TWO DAYS, "THE BEST INTEREST OF THE CHILD."

WHAT, AS COMMISSIONER, DO YOU UNDERSTAND THAT TO MEAN?

A. TO US THE BEST INTEREST OF THE CHILD IS -- YOU KNOW, IT'S A DIRECT CONNECTION TO OUR TRANSFORMATION EFFORT, WHICH OUR CHILDREN ARE IN HOMES WITH KIN IN THEIR COMMUNITY IN THE LEAST RESTRICTIVE ENVIRONMENTS.

Q. SO I WOULD LIKE TO TURN TO THE FOSTER PARENT SIDE OF THINGS, OR WHAT IS SOMETIMES CALLED RESOURCE PARENTS.

WHO ARE THEY, AND HOW DO THEY COME TO BE AVAILABLE TO THE CITY TO TAKE CARE OF THE CHILDREN WHO ARE IN THE CITY'S CUSTODY?

A. WELL, THEY ARE EVERYBODY AND ANYBODY WHO EXPRESSES AND HAS A CAPACITY AND INTEREST IN SERVING AS A RESOURCE FAMILY IN PHILADELPHIA.

Q. AND HOW DOES THE CITY BECOME AWARE OF THEM SUCH THAT THEY CAN OFFER CHILDREN THROUGH THE CENTRAL REFERRAL UNIT PLACEMENTS?

A. THERE IS AN -- ON THE CITY SIDE, WE HAVE ACTIVELY BEEN INVOLVED IN RECRUITMENT AND ENGAGEMENT EFFORTS WITH THE COMMUNITY, SO THAT WE CAN EXPAND THE NUMBER OF FAMILIES. A NUMBER OF FOSTER-CARE AGENCIES HIRE AND HAVE THEIR OWN RECRUITMENT STAFF WHO ACTUALLY WORK TO IDENTIFY THEIR OWN FAMILIES AS WELL.

Q. IS RECRUITING OR -- AND CERTIFYING FOSTER-CARE PARENTS A RESPONSIBILITY OF ALL OF THE FOSTER-CARE AGENCIES THAT CONTRACT WITH THE CITY?

A. IT IS.

Q. SO YOU MENTIONED THE CITY'S RECRUITMENT EFFORTS.

A. YES.

Q. WHAT ARE THOSE RECRUITMENT EFFORTS, AND WHY IS THE CITY ENGAGED IN THEM?

A. SO WE HAVE BEEN ON A QUEST TO -- FOR A FEW THINGS; ONE IS TO ENSURE THAT WE HAVE MORE KIDS IN THEIR COMMUNITIES IN THE LEAST RESTRICTIVE ENVIRONMENTS, AND SO WE HAVE BEEN LOOKING TO REDUCE THE CONGREGATE CARE NUMBERS. AND THEN WE HAVE BEEN LOOKING TO MAKE SURE THAT WE HAVE ALL AND AS MANY OPTIONS FOR OUR CHILDREN IN THE SYSTEM.

SO WE BELIEVE THE BEST WAY TO DO THAT IS TO ENSURE WE CAN HAVE MORE HOMES AVAILABLE, AS WELL AS MAKE SURE THAT WE WERE IDENTIFYING THE FACT THAT WE HAD A LARGE NUMBER OF OLDER YOUTH THAT IDENTIFIED AS LGBTQ,

AND WE WANTED TO ENSURE THAT WE HAD HOMES THAT WERE AFFIRMING TO THAT YOUTH, TO THAT GROUP.

Q. IS THAT GROUP MORE DIFFICULT TO FIND PLACEMENTS FOR THAN SOME OTHER GROUPS, IN YOUR EXPERIENCE?

A. IT HAS, YES.

Q. WHY DO YOU UNDERSTAND THAT TO BE?

A. SO THAT THE CHILD KNOWS GOING INTO THAT HOME THAT THERE ^AREN'T ANY ISSUES OR CHALLENGES IN REGARD TO THEIR OWN SEXUAL IDENTITY OR IDENTIFICATION, AND THAT THEY CAN BEHAVE FREELY AND BE WHO THEY ARE AS AN INDIVIDUAL IN THAT HOME WITH THOSE RESOURCE PARENTS.

Q. AND WHAT IS THE RESULT OF THE CITY'S RECENT RECRUITMENT EFFORTS?

A. WE HAVE BEEN HIGHLY SUCCESSFUL. WE ARE THRILLED. WE HAVE IDENTIFIED AND CERTIFIED 75 HOMES SINCE THAT RECRUITMENT EFFORT, AND WE HAVE ALSO REALLY EXPANDED THE NETWORK OF INDIVIDUALS WHO HAVE STEPPED FORWARD TO EXPRESS AN INTEREST IN BECOMING A RESOURCE PARENT.

Q. AND YOU MENTIONED THAT THERE ARE CHILDREN ALSO IN CONGREGATE CARE?

A. YES.

Q. WHAT IS CONGREGATE CARE?

A. CONGREGATE CARE IS A RESIDENTIAL PLACEMENT THAT I MIGHT REFER TO AS A SHELTER, A GROUP HOME, OR AN

INSTITUTION.

Q. AND IS IT -- COULD ALL OF THOSE CHILDREN BE PLACED WITH FAMILIES, OR ARE THERE CHILDREN --

A. NO.

Q. -- WHO ARE NOT APPROPRIATE TO PLACE WITH FAMILIES?

A. THERE ARE A NUMBER OF CHILDREN THAT ARE IN A RESIDENTIAL SETTING FOR A NUMBER OF FACTORS THAT WOULD NOT HAVE THEM BE AN APPROPRIATE PLACEMENT IN FOSTER-CARE.

Q. OUTSIDE OF THOSE CIRCUMSTANCES, ARE THERE OCCASIONS WHERE A CHILD CAN BE IMMEDIATELY PLACED WITH A FOSTER FAMILY?

A. YES, THAT'S CORRECT. THERE'S A HOST OF REASONS, WHETHER IT'S THE YOUNG CHILD'S HISTORY; IF THERE IS ACUTE, AS I SAID BEFORE, BEHAVIORAL HEALTH ISSUE; IF THERE ARE -- UNFORTUNATELY, THERE'S OFTENTIMES SEXUAL, ACTING-OUT BEHAVIOR, AND THE CHILD HAS TO BE PLACED COMPLETELY ALONE, SO IF THERE IS ANOTHER SIBLING OR ANOTHER CHILD IN THE HOME, WE CANNOT PLACE THAT CHILD RIGHT AWAY.

IT IS AN INCREDIBLY COMPLEX SYSTEM. THE RESPONSIBILITY OF MANAGING OVER 6,000 KIDS, AND THE NUMBER OF HOTLINE CALLS AND REFERRALS AND INVESTIGATIONS THAT HAPPEN. WE ARE ALWAYS TRYING TO ENSURE THAT WE ARE

MAKING THE BEST DETERMINATION FOR THAT CHILD.

Q. IS IT DHS'S RESPONSIBILITY, TO THE BEST OF ITS ABILITY, TO REVIEW ALL OF THE INFORMATION ABOUT CHILD -- CHILDREN BEFORE MAKING A PLACEMENT?

A. YES. WE DON'T LIKE TO RUSH TO MAKE A DETERMINATION THAT COULD FURTHER PLACE A CHILD IN HARM'S WAY.

Q. THANK YOU.

SO I WANT TO TURN TO TALK ABOUT CATHOLIC SOCIAL SERVICES, THE PLAINTIFF HERE TODAY, AND MORE CONCRETELY THE ISSUES IN THIS LITIGATION.

IN YOUR UNDERSTANDING, WHAT DOES CATHOLIC SOCIAL SERVICES DO FOR DHS?

A. THEY HAVE TO DO A HOST OF SERVICES FOR US, BOTH ON THE CHILD WELFARE, THE DELINQUENT, AND THE PREVENTION SERVICES SIDE OF THAT, SO IT'S -- I AM HAPPY TO TALK ABOUT ALL OF THOSE INDIVIDUALS SERVICES THAT -- ALMOST EVERYTHING I HAVE HIGHLIGHTED THAT WE HAVE SOME CAPACITY TO HAVE A CONTRACT WITH, WE ENGAGE IN CONTRACTS WITH CATHOLIC SOCIAL SERVICES.

Q. AND IN TERMS OF BROAD FOSTER-CARE ACTIVITIES, JUST GENERALLY, WHAT DO THOSE INCLUDE, NOT IN DETAILS?

A. SO THEY ARE A GENERAL FOSTER-CARE PROVIDER, AND SO THEIR RESPONSIBILITIES, AS WITH ALL FOSTER-CARE AGENCIES, ARE TO RECRUIT, TRAIN, AND CERTIFY FOSTER-CARE

HOMES AND FAMILIES.

Q. AND WERE YOU INVOLVED IN THE LAST YEAR'S CONTRACTING PROCESS WITH CATHOLIC SOCIAL SERVICES FOR THEIR FOSTER-AGENCY ACTIVITIES?

A. I SIGN ALL CONTRACTS FOR THE DEPARTMENT.

Q. AND YOU ARE FAMILIAR WITH THE CONTRACT?

A. I AM FAMILIAR WITH THE CONTRACT.

Q. DOES THAT CONTRACT, IN YOUR VIEW AS COMMISSIONER ASSIGNED FOR THE CITY, INCLUDE THE RECRUITMENT AND CERTIFICATION OF NEW FOSTER-CARE FAMILIES?

A. YES. IT CLEARLY DEFINES THAT AS SERVICES RENDERED BY THE CONTRACTOR.

MR. RIENZI: OBJECTION, YOUR HONOR. IT CALLS FOR LEGAL CONCLUSIONS.

THE COURT: OVERRULED.

BY MR. FIELD:

Q. AND DOES THE -- AND IN YOUR VIEW, DOES THE COMPENSATION UNDER THE CONTRACT COMPENSATE CATHOLIC SOCIAL SERVICES FOR THOSE ACTIVITIES?

A. YES.

MR. RIENZI: OBJECTION.

MS. BARCLAY: OBJECTION.

THE COURT: OVERRULED.

BY MR. FIELD:

Q. AND CATHOLIC SOCIAL SERVICES ALSO HAS A

COMMUNITY UMBRELLA AGENCY?

A. THEY DO.

Q. WHAT ROLE DO THEY PLAY?

A. SO ALL OF THE COMMUNITY UMBRELLA AGENCIES, AS WITH CATHOLIC SOCIAL SERVICES, ARE THE CASE MANAGEMENT COMPONENT OF THE CHILD WELFARE SYSTEM, SO THAT'S THE REFORM EFFORT THAT WAS TALKED ABOUT YESTERDAY.

SO ALL OF THE COORDINATION OF SERVICES WHO -- OF CHILDREN WHO ARE IN OUR CARE, WHETHER IN-HOME OR PLACEMENT IN FOSTER-CARE OR A CONGREGATE-CARE SETTING, THEY COORDINATE AND SUPPORT THE WORK OF THAT CASE TO MOVE IT TOWARDS TIMELY PERMANENCY.

Q. AND ARE THEY RESPONSIBLE FOR WORKING SPECIFICALLY WITH CATHOLIC SOCIAL SERVICES FOSTER-CARE AGENCY, OR WITH ANY FOSTER-CARE AGENCY?

A. THEY ARE REQUIRED TO WORK WITH ALL FOSTER-CARE PROVIDERS.

Q. THANK YOU.

SO I WOULD LIKE TO MOVE TO CSS'S -- TO THE CLOSURE OF CSS'S INTAKE AND THE ISSUES THAT ARE CENTRAL TO THIS LITIGATION TODAY.

HOW DID -- WHAT ASPECT OF THIS MATTER FIRST CAME TO YOUR ATTENTION?

MR. RIENZI: OBJECTION, VAGUE.

BY MR. FIELD:

Q. WHAT ASPECT OF CSS'S REFERRAL POLICIES THAT ARE AT ISSUE IN THIS LITIGATION FIRST CAME TO YOUR ATTENTION?

THE COURT: OVERRULED.

THE WITNESS: SO WHAT SPECIFICALLY CAME TO MY ATTENTION AS I GOT A CALL FROM -- WE GOT A -- DHS GOT A CALL FROM THE PHILADELPHIA INQUIRER REGARDING KNOWLEDGE THAT THEY HAD THAT TWO ORGANIZATIONS, CATHOLIC SOCIAL SERVICES AND BETHANY CHRISTIAN SERVICES, WERE DENYING TO SERVE SAME-SEX COUPLES.

MR. RIENZI: OBJECTION, AND MOVE TO STRIKE, YOUR HONOR. IT'S HEARSAY.

THE COURT: OVERRULED. THIS IS NOT FOR THE TRUTH OF THE MATTER.

BY MR. FIELD:

Q. AND WHAT DID YOU DO WHEN YOU LEARNED THAT?

A. UPON HEARING THAT, BOTH MYSELF AND FIRST DEPUTY COMMISSIONER JESSICA SHAPIRO ACTUALLY CALLED A NUMBER OF OUR FAITH-BASED INSTITUTIONS, AND WE STATED BY CALLING BETHANY CHRISTIAN SERVICES, AS WELL AS CATHOLIC SOCIAL SERVICES, TO ASK THEM THEIR POSITION REGARDING SERVING SAME-SEX COUPLES AND SERVING THEIR HOMES.

Q. WHAT DID YOU LEARN FROM THE PHONE CALLS?

MR. RIENZI: OBJECTION, HEARSAY.

THE COURT: OVERRULED.

THE WITNESS: I WAS ON THE PHONE WITH JESSICA AND JAMES AMATO AND HE INDICATED THAT THEY WOULD NOT, BASED ON THE RELIGIOUS POSITION, CERTIFY SAME-SEX HOMES, OR DO HOMES FOR ADOPTION.

BY MR. FIELD:

Q. WHAT DID YOU LEARN FROM BETHANY?

A. THEY HAD A SIMILAR STATEMENT. THEY INDICATED THAT THEY ACTUALLY HAD SAME-SEX HOMES THAT WERE CERTIFIED, BUT THEIR STATEMENT SAID THAT THEY WERE -- THEY WERE UNCLEAR ABOUT THEIR ABILITY TO SERVE SAME-SEX COUPLES.

Q. AND DID YOU -- YOU SAID YOU CONTACTED OTHER FOSTER-CARE AGENCIES AS WELL?

A. I DID. I CALLED A NUMBER OF FAITH-BASED INSTITUTIONS THAT SAME DAY, AND ASKED THEM WHAT THEIR POSITION WAS.

Q. WHAT DID YOU LEARN FROM ANY OF THEM?

MR. RIENZI: OBJECTION, HEARSAY.

MR. FIELD: SHE IS NOT OFFERING FOR THE --

THE COURT: SUSTAINED.

BY MR. FIELD:

Q. DID ANY OF THE OTHER AGENCIES TELL YOU THAT THEY WOULD NOT CERTIFY SAME-SEX COUPLES?

MR. RIENZI: OBJECTION, HEARSAY.

THE COURT: SUSTAINED.

BY MR. FIELD:

Q. ARE YOU AWARE OF ANY OTHER AGENCIES THAT -- IN FOSTER-CARE FOR THE CITY THAT WILL NOT CERTIFY SAME-SEX COUPLES?

A. NO.

Q. SO WHAT DID YOU DO AFTER YOUR CONVERSATION WITH JIM AMATO THAT YOU JUST REFERENCED?

A. SO AFTER MY CONVERSATION WITH JIM AMATO, I WAS IMMEDIATELY CONCERNED BECAUSE IT WOULD PUT THE CITY IN A POSITION OF DISCRIMINATING AGAINST ONE PARTICULAR COMMUNITY. I KNEW THAT THAT ACTUALLY HAD TO BE EXPLORED FURTHER, AND I MADE THE DETERMINATION THAT WE WOULD HAVE TO MEET WITH THEM TO DISCUSS THESE MATTERS FURTHER, AND WE WOULD HAVE TO DO AN ANALYSIS, TOO, OF HOW MANY CHILDREN ARE WE TALKING ABOUT, WHAT IS THE IMPACT ON THE KIDS THAT WE SERVED.

I ULTIMATELY DECIDED THAT IT WAS IN THE BEST INTEREST TO CLOSE INTAKE, SO THAT I COULD LOOK MORE DEEPLY INTO THIS ISSUE.

Q. BEST INTEREST OF THE HOME?

A. THE BEST INTEREST OF THE CHILDREN.

Q. AND WHY, IN YOUR VIEW, WAS IT IN THE BEST INTEREST OF THE CHILDREN TO CLOSE INTAKE AT THAT TIME?

A. SO I MAKE DETERMINATIONS AROUND CLOSURE REGARDING BEST INTEREST, EVEN IF THEY ARE ADMINISTRATIVE

OR PROGRAMMATIC, IN ORDER TO MAKE SURE THAT ANY ADDITIONAL CHILDREN THAT WE'RE PUTTING THERE WERE NOT GOING TO EITHER BE PUT IN HARM'S WAY, OR CAUSE ANY SORT OF DISRUPTION. IN THIS PARTICULAR CIRCUMSTANCE, ADDING ADDITIONAL CHILDREN TO THE CASELOAD COULD BE PROBLEMATIC.

Q. AND WHAT -- JUST SO WE ARE CLEAR ON WHAT WE ARE TALKING ABOUT, WHAT DOES "CLOSE INTAKE" MEAN TO YOU?

A. SO "CLOSE INTAKE" IS THAT WE WOULD NOT PROVIDE ANY -- WE WOULD NOT SEND IN THE WAY OF A REFERRAL ANY NEW CHILDREN TO BE PLACED IN A CATHOLIC SOCIAL SERVICES FOSTER-CARE HOME.

Q. IS THAT ANY NEW CHILDREN IN ALL CIRCUMSTANCES, OR ARE THERE EXCEPTIONS THAT DHS OBSERVES THOSE CIRCUMSTANCES?

MR. RIENZI: OBJECTION, LEADING.

THE COURT: OVERRULED.

YOU CAN ANSWER.

THE WITNESS: SO EXCEPTIONS AS IT RELATED, YES, ALWAYS SINCE IT IS IN THE CULTURE OF THE AGENCY TO LOOK AT KIN, SO, ABSOLUTELY, THE PLACEMENT OF SIBLINGS, THE ABILITY TO ALSO LOOK TO SEE THE HISTORY OF THE CHILD, IF THEY HAD A RECENT PLACEMENT WITH THAT PROVIDER.

THE COURT: OKAY. PERHAPS THIS WOULD BE AN APPROPRIATE TIME TO RECESS UNTIL THURSDAY AT 9:30.

MR. FIELD: THANK YOU, YOUR HONOR.

(ALL RISE.)

I N D E X

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
KIMBERLY ALI	-	3	24	27
JAMES AMATO	3	80	113	123
CYNTHIA FIGUEROA	148			

EXHIBITS	PAGE
PLAINTIFF EXHIBITS 1 THROUGH 12	80

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

DATE

OFFICIAL COURT REPORTER

LYNN MCCLOSKEY, RPR

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EXHIBIT 25

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA

- - -

SHARONELL FULTON, ET AL	:	CIVIL DOCKET FOR CASE
	:	NO. 18-2075
-VS-	:	
	:	
CITY OF PHILADELPHIA, ET AL	:	

- - -

PHILADELPHIA, PA.

JUNE 21, 2018

BEFORE HONORABLE JUDGE PETRESE B. TUCKER

TEMPORARY RESTRAINING ORDER

DAY 3

APPEARANCES:

FOR THE PLAINTIFF: BECKET FUND FOR RELIGIOUS LIBERTY
BY: MARK L. RIENZI, ESQ.
1200 NEW HAMPSHIRE AVE, N.W.
SUITE 700
WASHINGTON, DC 20036

FOR THE DEFENDANTS: CITY OF PHILADELPHIA LAW DEPARTMENT
BY: ELEANOR N. EWING, ESQ.
BENJAMIN H. FIELD, ESQ.
SCHAUNDRA OLIVER, ESQ.
DIANA P. CORTES, ESQ.
1515 ARCH STREET, 16TH FLOOR
PHILADELPHIA, PA 19102

ALSO PRESENT: LESLIE COOPER, ESQ. - ACLU
MARY CATHERINE ROPER - ACLU

LYNN MCCLOSKEY, RPR
OFFICIAL COURT REPORTER
1234 US COURTHOUSE
601 MARKET STREET
PHILADELPHIA, PA 19106
(856) 649-4774

THE COURT: GOOD MORNING.

ALL COUNSEL: GOOD MORNING, YOUR HONOR.

THE COURT: YOU MAY BE SEATED.

WILL THE WITNESS TAKE THE WITNESS STAND. YOU CAN STATE YOUR NAME.

THE WITNESS: CYNTHIA FIGUEROA.

CONTINUED DIRECT EXAMINATION

BY MR. FIELD:

Q. GOOD MORNING, COMMISSIONER FIGUEROA.

A. GOOD MORNING.

Q. THANK YOU FOR BEING BACK WITH US TODAY. IF YOU GIVE ME A MOMENT, I AM JUST GOING TO PREPARE MY NOTES AND START YOUR QUESTIONING AGAIN.

SO COMMISSIONER, STARTING TODAY, I JUST WANT TO RETURN TO THE TOPIC WE WERE TALKING ABOUT WHEN WE CLOSED ON WEDNESDAY AND MAKE SURE IT IS CLEAR WHAT WE ARE TALKING ABOUT AS WE GO FORWARD. TOWARDS THE END OF YOUR TESTIMONY YOU TALKED ABOUT BEING CONTACTED BY A REPORTER. REMIND US WHAT YOU LEARNED FROM THAT REPORTER.

A. SO THE REPORTER ASKED IF I WAS AWARE OF ANY ORGANIZATIONS, SPECIFICALLY BETHANY CHRISTIAN SERVICES AND CATHOLIC SOCIAL SERVICES, DISCRIMINATING AGAINST -- OFFERING SUPPORT AND SERVICES TO SAME-SEX COUPLES WHO WERE INTERESTED IN BECOMING FOSTER PARENTS.

Q. AND WHAT DID YOU UNDERSTAND THE NATURE OF THOSE TWO AGENCIES YOU REFERENCED, BETHANY AND CSS'S, OBJECTION TO BE?

A. I UNDERSTOOD THEIR OBJECTION TO BE TO NOT BE WILLING TO CERTIFY SAME-SEX COUPLES.

Q. WHAT WAS THE NATURE OF THAT OBJECTION? WAS IT SECULAR, WAS IT RELIGIOUS, WAS IT SOMETHING ELSE?

A. AS INDICATED BY JAMES AMATO, IT WAS BASED ON RELIGION.

Q. AND APPROXIMATELY WHEN, TO THE BEST OF YOUR RECOLLECTION, WAS THIS OUTREACH FROM A REPORTER?

A. IT WAS ON MARCH 9TH, AND I SUBSEQUENTLY SPOKE TO JAMES AMATO ON THE SAME DAY.

Q. SO SHORTLY AFTER THE CALL FROM THE REPORTER?

A. VERY SHORTLY AFTER THE CALL FROM THE REPORTER I CALLED JAMES AMATO AND THEN WE MADE A NUMBER OF CALLS THAT DAY.

Q. AND IS IT ON THAT CALL THAT JAMES AMATO TOLD YOU WHAT YOU JUST RELATED, THAT IT WAS A RELIGIOUS OBJECTION?

A. HE MADE IT CLEAR THAT BASED ON THEIR RELIGIOUS BELIEFS THAT THEY WOULD NOT DO THE CERTIFICATION PROCESS OF THE SAME-SEX COUPLE AND THEY WOULD NOT DO HOME STUDIES FOR ADOPTION FOR SAME-SEX COUPLES.

Q. AND ON WEDNESDAY YOU SAID THAT AFTER THAT CALL

YOU CALLED OTHER FAITH-BASED FOSTER CARE AGENCIES?

A. YES, THAT'S CORRECT. I CALLED A MAJORITY OF OUR PROVIDERS.

Q. AND WOULD YOU HAVE ANY REASON AT THAT POINT TO BELIEVE THAT A SECULAR AGENCY WOULD HAVE HAD AN OBJECTION TO SERVING SAME-SEX COUPLES?

A. I DID NOT, NO.

Q. AND SO UPON LEARNING THIS -- DID YOU SAY MARCH 9TH, MARCH 10TH?

A. IT WAS MARCH 9TH.

Q. MARCH 9TH. WHAT WAS YOUR -- WHAT CONCERNS DID THIS INFORMATION RAISE FOR YOU AS COMMISSIONER?

A. MY CONCERN IS THAT THERE WAS A PARTICULAR COMMUNITY THAT WAS BEING EXCLUDED FROM ALLOWING TO BECOME FOSTER PARENTS. AND I WAS CONCERNED THAT THIS WAS POSSIBLY IN VIOLATION OF THEIR CONTRACT, AND SO SUBSEQUENTLY LOOKED AT WORKING WITH OUR LAW DEPARTMENT TO DETERMINE WHAT CHALLENGES THE POSITION THAT CATHOLIC SOCIAL SERVICES TOOK IN REGARD TO THEIR ABILITY TO WORK WITH SAME-SEX COUPLES.

Q. AND WHY IS IT CONCERNING TO YOU AS COMMISSIONER IF A PARTICULAR COMMUNITY IS BEING EXCLUDED IN SOME WAY?

A. I THINK IT'S SIGNIFICANT IN A NUMBER OF FACTORS. ONE, AS PHILADELPHIA IS RESPONSIBLE FOR SERVING ALL CITIZENS, IT SENDS A SIGNAL, A VERY STRONG SIGNAL TO

THAT COMMUNITY THAT THEIR RIGHTS ARE NOT PROTECTED AND WE DON'T CARE ABOUT THEM. MORE IMPORTANTLY, WHEN YOU THINK ABOUT YOUTH THAT ARE BEING SERVED WHO MIGHT IDENTIFY AS LGBTQU, THEY WILL BECOME ADULTS AT SOME TIME. SO YOU ARE SENDING A SIGNAL TO THOSE YOUTH THAT WHILE WE MIGHT SUPPORT YOU NOW, WE WON'T SUPPORT YOUR RIGHTS AS AN ADULT.

Q. AND YOU TESTIFIED ON WEDNESDAY THAT YOU COULD NOT TAKE WHAT I UNDERSTAND TO BE CALLED AN INTAKE CLOSURE?

A. THAT IS CORRECT.

Q. TELL US AGAIN WHY YOU DID THAT.

A. SO I CLOSED INTAKE AND I BELIEVE I ALSO SHARED THIS ON WEDNESDAY IS THAT I HAVE CLOSED INTAKE IN OTHER CIRCUMSTANCES FOR OTHER PROVIDERS AS AN OPPORTUNITY TO GET A BETTER SENSE OF THE MAGNITUDE OF THE ISSUE AND ALSO TO MAKE SURE THAT WE STOP ANY FURTHER DAMAGE THAT MIGHT OCCUR. AND FOR ME IN THIS INSTANCE IT WAS MAKING SURE THAT WE WERE NOT PROVIDING ADDITIONAL CHILDREN TO BE SENT TO CATHOLIC SOCIAL SERVICES OR BETHANY AT THE TIME.

Q. AND YOU SAID -- YOU JUST USED THE WORD PREVENT ANY FURTHER DAMAGE TO OCCUR. HOW, IN YOUR VIEW, COULD SENDING ADDITIONAL CHILDREN CREATE THE POSSIBILITY OF FURTHER DAMAGE?

A. AT THE POINT IN WHICH I CLOSED INTAKE, IT WASN'T CLEAR TO ME, BUT IT BECAME ABUNDANTLY CLEAR THEREAFTER, THAT THE ABILITY TO COMPLY WITH THE FULL ENTIRETY OF THEIR CONTRACT WAS UNCERTAIN. AND SO IF YOU ARE NOT ABLE TO COMPLY WITH YOUR CONTRACT, CERTAINLY IT PUTS -- YOU KNOW, IT'S A CONCERN FOR THE CITY, IT WAS A CONCERN FOR ME TO NOT MAKE SURE THAT MORE CHILDREN COULD HAVE BEEN DISRUPTED IF WE CONTINUED TO SEND KIDS TO CATHOLIC SOCIAL SERVICES.

Q. AND JUST SO I FULLY UNDERSTAND, HOW COULD MORE -- HOW COULD CHILDREN BE DISRUPTED? WHAT ARE YOU LOOKING AT AND THINKING ABOUT WHEN YOU SAY THAT?

A. SO IF WE -- IF CATHOLIC SOCIAL SERVICES COULD NOT COMPLY AND THEY REFUSED TO ENTER INTO A FULL CONTRACT, WE WOULD HAVE TO MOVE ALL OF THE CHILDREN WHO ARE CURRENTLY SERVED BY CATHOLIC SOCIAL SERVICES TO ANOTHER PROVIDER. AND SO CERTAINLY A PLACEMENT DISRUPTION IS NOT AT ALL WHAT THE CITY WANTS TO OR INTENDS TO DO, AND CERTAINLY NOT A POSITION THAT WE WANTED TO FIND OURSELVES IN.

Q. SO YOU CLOSED INTAKE TO MAKE SURE FEWER CHILDREN -- NO ADDITIONAL CHILDREN WERE ADDED TO THAT MIX?

A. THAT'S CORRECT.

Q. YOU MENTIONED HAVING CLOSED INTAKE IN OTHER INSTANCES IN THE PAST.

A. YES.

Q. HOW HAS THAT BEEN HANDLED ADMINISTRATIVELY WITHIN DHS? WHAT DO YOU DO WHEN YOU CLOSE INTAKE?

A. GENERALLY, INFORMATION IS BROUGHT TO MY ATTENTION OR I AM MADE AWARE OF DIRECTLY. AND I DISCUSS THOSE MATTERS WITH MY EXECUTIVE TEAM AND MAKE A DETERMINATION THAT IT'S IN THE BEST INTEREST TO SHUT INTAKE. SO WE HAVE DONE THAT FOR ADMINISTRATIVE REASONS, AND WE HAVE DONE IT FOR PROGRAMMATIC REASONS. AND THE DURATION OF THE INTAKE CLOSURE IS REALLY IN PLACE UNTIL THE ISSUE IS REMEDIATED OR TAKEN CARE OF.

Q. DOES DHS PERMIT EXCEPTIONS WHEN IT CLOSES INTAKE?

A. ABSOLUTELY. IN THE CASE OF CATHOLIC SOCIAL SERVICES WE HAVE MADE A NUMBER OF EXCEPTIONS.

Q. IN WHAT CONTEXT ARE EXCEPTIONS CONSIDERED?

A. SO EXCEPTIONS HAVE BEEN CONSIDERED AS IT RELATES TO KEEPING SIBLINGS TOGETHER, AS WELL AS IN CASES WHERE A CHILD HAD RECENTLY RESIDED WITH A FOSTER PARENT AND COULD RETURN BACK TO A HOME THAT THE CHILD WAS FAMILIAR WITH.

Q. AND IN THE PAST INSTANCES OF CLOSING INTAKE, HAVE SIMILAR EXCEPTIONS BEEN GRANTED?

A. ABSOLUTELY. WE JUST LAST WEEK HAD AN EXPERIENCE WHERE ANOTHER ORGANIZATION THAT HAS THEIR INTAKE

CURRENTLY CLOSED ALSO FOR ADMINISTRATIVE REASONS, THE CRU MADE MYSELF AND KIMBERLY ALI AWARE AND ASKED FOR US TO CONSIDER AN EXCEPTION, AND WE SUBSEQUENTLY DID SO.

Q. AND THE CRU YOU TALKED ABOUT YESTERDAY IS CENTRAL REFERRAL UNIT?

A. THAT IS CORRECT.

Q. AND THE CENTRAL REFERRAL UNIT IS RESPONSIBLE FOR PLACEMENTS, IS THAT CORRECT?

A. THEY'RE RESPONSIBLE FOR HELPING DETERMINE THE LEVEL OF CARE AND SUBSEQUENTLY HELPING TO IDENTIFY THE BEST PLACEMENT FOR THE YOUTH THAT IS PRESENTED TO THE CRU.

Q. AND IN PAST INTAKE CLOSURES, HAS THE CENTRAL REFERRAL UNIT BEEN INVOLVED IN MAKING EXCEPTIONS FOR, I BELIEVE YOU SAID, KINSHIP AND WHEN THERE WAS A RELATIONSHIP WITH A PRIOR FOSTER PARENT?

A. YES. IT'S VERY STANDARD PRACTICE AND I WOULD JUST HIGHLIGHT THAT WE ARE IN CONSTANT COMMUNICATION WITH THE CRU. SO THERE IS -- ON ANY GIVEN DAY, THERE ARE COMPLICATED HIGH PROFILE CASES THAT COME TO THE ATTENTION OF BOTH DEPUTY COMMISSIONER ALI AND MYSELF. AND SO IT'S PRETTY STANDARD PRACTICE WHEN THEY ARE AWARE THAT THERE IS A CLOSURE THAT THEY WOULD BRING SOMETHING TO OUR ATTENTION. SOMETIMES THERE IS AN ISSUE OF A COURT ORDER OR THERE'S SOMETHING THAT COMES UP THAT

MAKES THEM RECOGNIZE THAT AN EXCEPTION SHOULD BE CONSIDERED, AND PARTICULARLY WHERE THAT IS MOST SIGNIFICANT IS KIN, BECAUSE THAT HAS BEEN SUCH A CULTURAL NORM FOR OUR DEPARTMENT.

MR. RIENZI: OBJECTION, MOVE TO STRIKE. THAT'S NOT RESPONSIVE TO THE QUESTION.

THE COURT: OVERRULED.

BY MR. FIELD:

Q. WITH RESPECT TO CSS, THE INTAKE CLOSURE YOU REFERENCED, DOES THAT STILL REMAIN IN PLACE?

A. YES.

Q. WHY DOES THAT STILL REMAIN IN PLACE?

A. BECAUSE WE HAVE NOT RESOLVED THE ISSUE, AND CSS HAS INDICATED THAT THEY DO NOT WANT TO ENTER INTO A FULL CONTRACT WITH THE CITY, IN WHICH CASE I DON'T WANT TO SEND ADDITIONAL CHILDREN WHOSE SUBSEQUENT SITUATION COULD BE DISRUPTED.

Q. AS DHS COMMISSIONER, WOULD IT -- IS IT -- WOULD DHS OFFER CATHOLIC SOCIAL SERVICES THE SAME FULL CONTRACT IT IS OFFERING THE OTHER FOSTER CARE AGENCIES?

A. YES.

MR. RIENZI: OBJECTION, SPECULATION.

THE COURT: OVERRULED.

THE WITNESS: YES, AND WE HAVE.

BY MR. FIELD:

Q. AND HAS DHS OFFERED CATHOLIC SOCIAL SERVICES AN ALTERNATIVE?

A. YES, WE HAVE.

Q. AND WHAT IS THAT ALTERNATIVE?

A. WE OFFERED A LIMITED CONTRACT TO ENSURE THAT THEY COULD CONTINUE TO SEARCH THE CHILDREN WHO ARE CURRENTLY PLACED IN FOSTER CARE WITHOUT SENDING IN ADDITIONAL REFERRALS. IT WAS GOOD TO HEAR MR. AMATO STATE THAT THEY WOULD CONSIDER ENTERING INTO A LIMITED CONTRACT.

MR. RIENZI: OBJECTION, MOVE TO STRIKE THE NARRATIVE.

THE COURT: OVERRULED.

BY MR. FIELD:

Q. HAVE YOU BEEN IN SITUATIONS IN THE PAST IN WHICH PROVIDERS ARE CLOSING OR FOR SOME OTHER REASON UNABLE TO CONTINUE LONG-TERM PROVIDING SERVICES?

A. YES. UNFORTUNATELY IN MY TENURE I HAVE HAD TO EXPERIENCE THAT A FEW TIMES.

Q. AND IN THOSE EXPERIENCES, WHAT HAVE YOU DONE TO WORK WITH PROVIDERS TO ENSURE THE BEST INTEREST OF THE CHILDREN?

A. SO IN A NUMBER OF EXPERIENCES WE HAVE ACTUALLY NEGOTIATED A CONTRACT IN -- UNDERSTANDING THAT THEY WERE GOING TO HAVE TO CLOSE, BUT UNDERSTANDING ALSO THAT WE

NEEDED THE STAFFING AND WE NEEDED THE ABILITY TO ASSURE QUALITY SERVICES AND THE SAFETY OF CHILDREN. AND SO WE NEGOTIATED THE STAFFING LEVELS AND THE CONTRACTED AMOUNTS. IN ONE PARTICULAR CASE WE HAD AN INDIVIDUAL, AND I KNOW THIS GETS VERY MUCH INTO JARGON AROUND OUR CONTRACTS, BUT WE PAY A LOT OF THE PLACEMENT SERVICES IN WHAT WE CALL A PER DIEM. SO THAT'S LIKE A SET AMOUNT OF MONEY PER CHILD PER DAY. AND THEN WE HAVE THE ABILITY TO DO WHAT IS CALLED A COST REIMBURSEMENT CONTRACT.

IN ONE INSTANCE WHEN WE KNEW WE WERE CLOSING THE PROGRAM, WE KNEW IT WAS NOT FINANCIALLY VIABLE OR IN THE BEST INTEREST OF THE KIDS FROM A PROGRAMMATIC STANDPOINT, THEY WERE NOT GOING TO BE ABLE TO KEEP STAFF, SO WE CHANGED IT FROM A PER DIEM CONTRACT TO A COST REIMBURSEMENT, AND WE GUARANTEED THEM THE ABILITY TO HAVE A SET AMOUNT OF STAFF.

IN ONE OTHER INSTANCE WE ACTUALLY OFFERED STAY BONUSES FOR STAFF TO MAKE SURE THAT WE HAD THE EXACT STAFFING PATTERN WE NEEDED UNTIL CLOSURE.

Q. AND DO YOU HAVE ANY REASON TO THINK YOU WOULD NOT ENGAGE IN NEGOTIATIONS OF THIS SORT WITH CATHOLIC SOCIAL SERVICES?

MR. RIENZI: OBJECTION, SPECULATION.

THE WITNESS: NO.

BY MR. FIELD:

Q. WOULD YOU ENGAGE IN NEGOTIATIONS OF THIS SORT WITH THE CATHOLIC SOCIAL SERVICES?

MR. RIENZI: OBJECTION, SPECULATION.

THE COURT: OVERRULED.

THE WITNESS: YES, THAT'S WITHIN MY PURVIEW AS THE COMMISSIONER, AND I WOULD NEGOTIATE THOSE TERMS.

BY MR. FIELD:

Q. REAL BRIEFLY, YOU MENTIONED WHEN YOU WERE FIRST CONTACTED BY A REPORTER TWO AGENCIES, CATHOLIC SOCIAL SERVICES AND BETHANY, I BELIEVE?

A. THAT IS CORRECT.

Q. WHAT DOES BETHANY DO FOR DHS?

A. FOSTER CARE SERVICES.

Q. SO IT'S A SIMILAR CONTRACT?

A. YES.

Q. AND DID YOU CLOSE INTAKE WITH REGARD TO BETHANY?

A. YES, I DID.

Q. DOES IT REMAIN CLOSED?

A. AS OF TODAY IT REMAINS CLOSED, YES.

Q. AND IS IT YOUR EXPECTATION THAT BETHANY WILL SIGN A FULL CONTRACT FOR THE COMING YEAR?

THE WITNESS: YES.

MR. RIENZI: OBJECTION, SPECULATION.

THE COURT: OVERRULED.

THE WITNESS: YES. IT'S MY EXPECTATION. IN COMMUNICATION IT HAS BEEN INDICATED THAT WE WILL LIKELY ENTER INTO A FULL CONTRACT WITH BETHANY.

BY MR. FIELD:

Q. AND IS IT YOUR UNDERSTANDING OF THE COMING FISCAL YEAR CONTRACT THAT IT INCLUDES A CLAUSE THAT PROVIDERS NOT DISCRIMINATE IN THE RECRUITMENT AND CERTIFICATION OF FOSTER PARENTS?

MR. RIENZI: OBJECTION, SPECULATION, HEARSAY AND BEST EVIDENCE RULE. THE DOCUMENT SPEAKS FOR ITSELF.

THE COURT: OVERRULED.

THE WITNESS: YES.

MR. FIELD: MAY I HAVE A MOMENT, YOUR HONOR?

THE COURT: YES.

MR. FIELD: THANK YOU.

(BRIEF PAUSE IN THE PROCEEDING.)

MR. FIELD: THAT'S ALL I HAVE AT THE MOMENT, YOUR HONOR.

THE COURT: OKAY. CROSS-EXAMINE.

MR. FIELD: THANK YOU.

THE WITNESS: THANK YOU.

MR. RIENZI: YOUR HONOR, CAN I TAKE A VERY SHORT RECESS SO THAT I CAN CONFER WITH MY

CO-COUNSEL AND LOOK AT MY NOTES SO I CAN DO THIS AS BRIEFLY AS POSSIBLE.

THE COURT: I WILL GIVE YOU TWO MINUTES.

MR. RIENZI: THAT'S ALL I NEED. THANK YOU, YOUR HONOR.

(BRIEF PAUSE IN THE PROCEEDING.)

CROSS-EXAMINATION

BY MR. RIENZI:

Q. GOOD MORNING, COMMISSIONER FIGUEROA.

A. GOOD MORNING.

Q. YOU HAVE HAD A LONG CAREER DOING A VARIETY OF DIFFERENT KINDS OF SOCIAL JUSTICE WORK?

A. THAT IS CORRECT.

Q. I BELIEVE YOU SAID YESTERDAY YOU WENT TO A JESUIT COLLEGE?

A. I DID.

Q. AND THEN YOU STARTED YOUR CAREER IN THE JESUIT VOLUNTEER CORPS?

A. YES, THAT'S CORRECT.

Q. WHAT INSPIRED YOU TO DO THAT?

A. MOSTLY MY PARENTS AND A HISTORY -- LONG TRADITION. WE HAVE BELIEVED FAITH AND SOCIAL JUSTICE ARE GOOD TENETS TO ENSURE THAT THOSE WITH LESS HAVE THE SAME OPPORTUNITIES THAT WE HAVE BEEN GIVEN.

Q. AND THOSE EXPERIENCES PROBABLY GAVE YOU A GOOD

UNDERSTANDING OF WHAT CATHOLIC NONPROFIT SERVICE GROUPS ARE LIKE?

A. ABSOLUTELY.

Q. YOU KNOW THAT CATHOLIC LOSES MONEY DOING FOSTER CARE?

A. NO, I AM NOT AWARE OF THAT.

Q. DO YOU KNOW THAT CATHOLIC IS A RELIGIOUS ORGANIZATION?

A. I DO KNOW THAT.

Q. AND AS DHS COMMISSIONER WOULD YOU SAY THAT CATHOLIC HAS A STRONG COMMITMENT TO SERVICE?

A. YES.

Q. AND FOR CATHOLIC THAT COMMITMENT TO SERVICE IS PART OF HOW THEY PRACTICE THEIR RELIGIOUS BELIEFS?

A. I WOULD NOT PROVIDE THAT EXPECTATION.

Q. DO YOU THINK THERE'S A DIFFERENT REASON?

A. THERE COULD BE.

Q. YOU HAVE NO OPINION EITHER WAY AS TO WHETHER THEY DO IT FOR RELIGIOUS REASONS?

A. I DON'T KNOW THAT IT IS FOR ME TO SAY.

Q. I'M ASKING, DO YOU HAVE AN OPINION?

A. NO.

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE COURT: OVERRULED.

BY MR. RIENZI:

Q. YOU HAVE BEEN DHS COMMISSIONER SINCE WHEN?

A. MY TENURE BEGAN IN SEPTEMBER OF 2016.

Q. DO YOU HAVE THAT JOB FOR A PARTICULAR TERM OF YEARS?

A. NO.

Q. YOU ARE AN AT-WILL EMPLOYEE?

A. I'M AN EXEMPT EMPLOYEE WITH THE CITY OF PHILADELPHIA.

Q. HOW MANY FOSTER AGENCIES ARE THERE IN THE CITY RIGHT NOW?

A. THERE ARE 30 AGENCIES IN THE CITY OF PHILADELPHIA.

Q. DOES THAT INCLUDE CATHOLIC WHEN YOU SAY THAT?

A. IT DOES.

Q. AND BETHANY?

A. YES.

Q. SO OF THOSE, HOW MANY PROVIDE HOME STUDIES FOR SAME-SEX COUPLES?

A. TO MY KNOWLEDGE, ALL OF THEM SHOULD.

Q. HOW MANY DO?

A. ALL OF THEM. EXCEPT FOR CATHOLIC SOCIAL SERVICES.

Q. SO IT IS YOUR TESTIMONY THAT 28 TODAY PROVIDE HOME STUDIES FOR SAME-SEX COUPLES?

A. WELL, ACTUALLY BETHANY DOES BECAUSE THEY HAVE CERTIFIED A NUMBER OF SAME-SEX COUPLES, SO I WOULD JUST SAY CATHOLIC.

Q. SO TODAY 29 AGENCIES WILL DO HOME STUDIES FOR SAME-SEX COUPLES?

A. FROM MY KNOWLEDGE.

Q. IF CATHOLIC CLOSES THEIR PROGRAM, HOW MANY FOSTER AGENCIES IN THE CITY WILL PROVIDE HOME STUDIES TO SAME-SEX COUPLES?

A. THE SAME --

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE COURT: OVERRULED.

THE WITNESS: THE SAME NUMBER, I PRESUME.

BY MR. RIENZI:

Q. AND IF CATHOLIC IS ALLOWED TO RESUME ITS PAST PRACTICE, HOW MANY AGENCIES IN THE CITY WILL PROVIDE HOME STUDIES FOR SAME-SEX COUPLES?

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE COURT: OVERRULED.

THE WITNESS: 29.

BY MR. RIENZI:

Q. SO NO MATTER HAPPENS IN THIS CASE IT IS YOUR TESTIMONY THERE WILL BE 29 AGENCIES IN THE CITY THAT

PROVIDE HOME STUDIES FOR SAME-SEX COUPLES, CORRECT?

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE COURT: OVERRULED.

THE WITNESS: YES.

BY MR. RIENZI:

Q. TO YOUR KNOWLEDGE, DHS HAS RECEIVED NO COMPLAINTS AGAINST CATHOLIC FOR OPERATING ACCORDING TO ITS RELIGIOUS BELIEFS, CORRECT?

A. THAT IS CORRECT.

Q. TO YOUR KNOWLEDGE, YOU HAVE RECEIVED NO COMPLAINTS AGAINST CATHOLIC FOR PROVIDING FOSTER CARE SERVICES ACCORDING TO ITS RELIGIOUS BELIEFS, CORRECT?

A. NONE THAT I AM -- NONE THAT I CAN RECALL.

Q. TO YOUR KNOWLEDGE, YOU HAVE RECEIVED NO COMPLAINTS AGAINST CATHOLIC FOR FAILING TO PERFORM A HOME STUDY FOR SOMEONE WHO WANTED IT, CORRECT?

A. I CAN'T ANSWER THAT UNEQUIVOCALLY.

Q. BUT YOU ARE NOT AWARE OF ANY AS YOU SIT HERE TODAY?

A. I AM NOT AWARE OF ANY, NO.

Q. TO YOUR KNOWLEDGE, NOT A SINGLE PROSPECTIVE LGBT FOSTER PARENT WAS UNABLE TO BECOME A FOSTER PARENT BECAUSE OF CATHOLIC'S RELIGIOUS EXERCISE, CORRECT?

A. I CAN'T ANSWER THAT.

Q. YOU DON'T KNOW EITHER WAY?
A. I CAN'T ANSWER THAT.
Q. ARE YOU AWARE OF ANY WHO ARE UNABLE TO BECOME A FOSTER PARENT BECAUSE OF CATHOLIC?
A. I CAN'T ANSWER THAT.
Q. YOU CANNOT ANSWER BECAUSE YOU ARE NOT AWARE OF ANY, CORRECT?
A. I CAN'T ANSWER THAT BECAUSE I DON'T KNOW IF ANYBODY WAS TURNED AWAY.
Q. SO FAR AS DHS IS AWARE, THE NUMBER OF FOSTER PARENTS TURNED AWAY BY CATHOLIC WHO WANTED A HOME STUDY FOR AN LGBT COUPLE IS ZERO, CORRECT?
A. I CAN'T ANSWER THAT.
MR. FIELD: SHE JUST SAID SHE IS UNAWARE IF ANYBODY WAS TURNED AWAY, YOUR HONOR.
THE COURT: SHE ANSWERED SEVERAL TIMES.
BY MR. RIENZI:
Q. YOU SAID YOU ARE RESPONSIBLE FOR ABOUT 1500 EMPLOYEES?
A. THAT IS CORRECT.
Q. TO YOUR KNOWLEDGE, NOT ONE OF THEM HAS TOLD YOU ABOUT ANY COUPLE REJECTED BY CATHOLIC BECAUSE OF ITS RELIGIOUS EXERCISE?
A. NOT THAT I CAN RECALL.
Q. ON YOUR FOSTER CARE WEBSITE YOU TELL PROSPECTIVE

PARENTS TO LOOK FOR AN AGENCY THAT WOULD BE A GOOD FIT FOR THEM, CORRECT?

A. I DON'T HAVE IT IN FRONT OF ME, SO....

MR. RIENZI: PERMISSION TO APPROACH, YOUR HONOR.

THE COURT: YES.

BY MR. RIENZI:

Q. I AM HANDING YOU A DOCUMENT LABELED PLAINTIFF'S EXHIBIT 14. DO YOU RECOGNIZE THAT DOCUMENT?

A. I DO.

Q. WHAT IS THAT?

A. IT'S THE PHILADELPHIA WEBSITE. IT'S THE PHILLY.GOV WEBSITE.

Q. AND YOU ARE AN EMPLOYEE OF THE CITY OF PHILADELPHIA?

A. I AM.

Q. AND DHS IS PART OF THE CITY OF PHILADELPHIA GOVERNMENT?

A. THAT IS CORRECT.

Q. I WOULD LIKE YOU TO LOOK AT THE BOTTOM OF THE SECOND PAGE, PLEASE.

A. SECOND OR THIRD?

Q. BOTTOM OF THE SECOND SAYS: CHOOSE A FOSTER CARE AGENCY. DO YOU SEE THAT?

A. YES.

Q. AND THAT SAYS: DHS WORKS WITH MANY STATE LICENSED AGENCIES TO PROVIDE FOSTER CARE. BROWSE THE LIST OF FOSTER AGENCIES TO FIND THE BEST FIT FOR YOU. YOU WANT TO FEEL CONFIDENT AND COMFORTABLE WITH THE AGENCY YOU CHOOSE. THIS AGENCY WILL BE A BIG SUPPORT TO YOU DURING YOUR RESOURCE PARENT JOURNEY. ONCE YOU HAVE FOUND ONE THAT YOU LIKE, CALL THEM TO FIND OUT HOW TO BEGIN THE CERTIFICATION PROCESS.

DID I READ THAT CORRECTLY SO FAR?

A. YOU DID, YES.

Q. IS ALL OF THAT TRUE TO THE BEST OF YOUR KNOWLEDGE?

A. ABSOLUTELY.

Q. OKAY. WHY DO YOU WANT FOSTER PARENTS TO FIND AN AGENCY THAT THEY WILL FEEL CONFIDENT AND COMFORTABLE WITH?

A. BECAUSE IT'S THE CHOICE OF THE FAMILY TO DETERMINE WHO THEY WANT TO BE SERVED BY.

Q. AND WHY WOULD YOU LIKE THEM TO BE CONFIDENT AND COMFORTABLE?

A. BECAUSE IT IS THEIR DECISION.

Q. I AM NOT ASKING WHOSE DECISION IT IS. I'M ASKING WHY WOULD YOU -- HERE IT SAYS YOU WOULD LIKE THEM TO FEEL CONFIDENT AND COMFORTABLE. WHY?

A. BECAUSE THEY ARE DECIDING TO BECOME A FOSTER

PARENT, SO THEY HAVE TO FEEL COMFORTABLE AND CONFIDENT IN THEIR DECISION.

Q. YOU WOULD LIKE THEM TO HAVE A GOOD FIT WITH THE AGENCY?

A. I'D LIKE THEM TO BE COMFORTABLE WITH THEIR DECISION.

Q. YOU WOULD LIKE THEM TO HAVE A GOOD FIT WITH THE AGENCY?

A. I WOULD LIKE THEM TO BE COMFORTABLE WITH THEIR DECISION.

Q. WOULD YOU LIKE THEM TO HAVE A GOOD FIT WITH THE AGENCY?

MR. FIELD: ASKED AND ANSWERED, YOUR HONOR.

MR. RIENZI: YOUR HONOR, SHE HAS NOT ANSWERED.

THE COURT: OVERRULED. SHE CAN ANSWER.

BY MR. RIENZI:

Q. WOULD YOU LIKE THEM TO HAVE A GOOD FIT WITH THE AGENCY?

A. YES.

Q. AGENCIES ARE ALLOWED TO HAVE DIFFERENT REQUIREMENTS FOR CERTIFYING FAMILIES, CORRECT?

A. NO.

Q. WOULD YOU READ FOR ME THE LAST SENTENCE OF THAT

PARAGRAPH WE WERE JUST LOOKING AT, PLEASE?

A. OH, DIFFERENT REQUIREMENTS, SPECIALTIES AND TRAINING.

Q. IT SAYS: EACH AGENCY HAS SLIGHTLY DIFFERENT REQUIREMENTS, SPECIALTIES AND TRAINING PROGRAMS, CORRECT?

A. CORRECT.

Q. AGENCIES ARE ALLOWED TO HAVE DIFFERENT REQUIREMENTS, CORRECT?

A. THEY MAY ONLY HAVE SPECIAL REQUIREMENTS AS IT RELATES TO MEDICAL AND SPECIALIZED BEHAVIORAL HEALTH.

Q. IT DOESN'T SAY THAT ON YOUR WEBSITE, DOES IT?

A. THIS IS MEANT TO PROVIDE GENERAL INFORMATION AND DOES NOT GO INTO INDIVIDUAL REGS OF ALL OF THE SPECIALIZATIONS.

Q. IS THERE SOMEPLACE ELSE THAT TELLS AGENCIES THAT THOSE ARE THE ONLY DIFFERENT REQUIREMENTS THEY ARE ALLOWED TO HAVE?

A. NOT THAT I CAN RECALL RIGHT NOW.

Q. I BELIEVE YOU TESTIFIED YESTERDAY AND SOME THIS MORNING THAT YOU ARE FAMILIAR WITH DHS'S CONTRACTS?

A. I AM.

Q. AND YOU ARE FAMILIAR WITH THE CONTRACT UNDER WHICH CATHOLIC PROVIDES FOSTER CARE SERVICES?

A. I AM.

Q. IS IT YOUR RESPONSIBILITY TO ENSURE THAT THAT CONTRACT IS ENFORCED?

A. THAT IS CORRECT.

Q. AND THAT AGENCIES ARE COMPLYING WITH THEIR CONTRACTUAL OBLIGATIONS?

A. THAT'S CORRECT.

Q. IN FACT, YOU SIGNED THE AGREEMENT?

A. I DID SIGN THE AGREEMENT.

Q. I BELIEVE YOU TESTIFIED YESTERDAY AND AGAIN SOME THIS MORNING ABOUT THE REASON YOU INSTITUTED A REFERRAL FREEZE?

A. AN INTAKE CLOSURE.

Q. INTAKE CLOSURE. THANK YOU. AN INTAKE CLOSURE. DID YOU DO THAT BECAUSE YOU THOUGHT CATHOLIC WAS IN VIOLATION OF ITS CONTRACT?

A. I BELIEVE SO, YES.

Q. WHAT PORTION OF THE CONTRACT WAS CATHOLIC IN VIOLATION OF, IN YOUR OPINION?

A. AFTER DISCUSSING WITH OUR LAW DEPARTMENT IT WAS CLEAR THE FAIR PRACTICES ORDINANCE AS WELL AS THE SERVICES PROVISION OF THEIR CONTRACT.

Q. I HAVE GOT TWO THERE. FAIR PRACTICES ORDINANCES?

A. UM-HUM.

Q. AND THE OTHER ONE YOU SAID WAS --

A. IS SERVICES, THE DEFINITION OF SERVICES.
Q. CAN YOU START WITH SERVICES AND TELL ME HOW, AS YOU UNDERSTAND IT, CATHOLIC WAS IN VIOLATION OF THE SERVICES PROVISION OF THE CONTRACT?
A. SO THE TOTALITY OF THE CONTRACT UNDER SERVICES REQUIRES THAT YOU TRAIN, RECRUIT AND CERTIFY FOSTER CARE HOMES. THE INABILITY TO DELIVER A PART OF THAT SERVICE WOULD NOT ALLOW YOU TO DO THE ENTIRETY OF YOUR CONTRACT.
Q. DOES THE SERVICES PROVISION SAY YOU MUST TRAIN, RECRUIT AND CERTIFY ALL FAMILIES?
MR. FIELD: OBJECTION, YOUR HONOR. THIS IS AN 80-PAGE CONTRACT AND HE IS ASKING ABOUT A PARTICULAR PROVISION WITHIN IT.
THE COURT: OVERRULED. SHE CAN ANSWER.
THE WITNESS: CAN YOU REPEAT YOUR QUESTION.
BY MR. RIENZI:
Q. SURE. DOES THE SERVICES PART OF THE CONTRACT REQUIRE -- STRIKE THAT.
DOES THE SERVICES PART OF THE CONTRACT TELL AGENCIES THAT THEY MUST RECRUIT AND CERTIFY ALL FAMILIES?
A. I DON'T HAVE IT IN FRONT OF ME. I COULD NOT WITHOUT --
Q. SURE. THAT'S UNDERSTANDABLE. I AGREE IT'S

LONG.

GIVE ME A SECOND, PLEASE.

MR. RIENZI: PERMISSION TO APPROACH, YOUR HONOR.

THE COURT: YES.

BY MR. RIENZI:

Q. I AM HANDING THE WITNESS WHAT HAS BEEN LABELED PLAINTIFF'S EXHIBIT 15. CAN YOU TELL ME IF YOU RECOGNIZE THAT, PLEASE?

A. I DO RECOGNIZE THIS.

Q. WHAT IS THAT DOCUMENT?

A. THIS IS THE CONFORMED STANDARD AMENDMENT AGREEMENT FOR CATHOLIC SOCIAL SERVICES.

Q. OKAY. AND THIS IS THE AGREEMENT UNDER WHICH CATHOLIC PROVIDES FOSTER CARE SERVICES?

A. YES. IN THIS PARTICULAR CONTRACT THERE'S A NUMBER OF OTHER PLACEMENT SERVICES ALSO IN HERE SO....

Q. AND YOU SIGNED THIS CONTRACT, CORRECT?

A. I DID. I BELIEVE MY SIGNATURE IS ON ONE OF THESE PAGES.

Q. CAN YOU DIRECT --

A. PAGE 5.

Q. TERRIFIC. THANK YOU.

CAN YOU DIRECT ME TO THE SERVICES PORTION OF THE CONTRACT THAT YOU WERE TELLING ME YOU BELIEVE

CATHOLIC HAS VIOLATED?

MR. FIELD: OBJECTION, CALLS FOR A LEGAL CONCLUSION.

THE WITNESS: I WOULD HAVE TO HAVE A MOMENT TO BE ABLE TO GO THROUGH THIS ENTIRE DOCUMENT TO FIND THE SECTIONS I AM REFERENCING.

THE COURT: I DON'T KNOW THAT YOU CAN ANSWER LIKE THAT.

THE WITNESS: BECAUSE SERVICES ARE REFERENCED IN MULTIPLE PARTS OF THE CONTRACT. IT'S NOT JUST IN ONE AREA. SO THERE IS THE GENERAL PROVISIONS. THERE'S THE SCOPE OF SERVICES AND THERE'S THE DEFINITIONS AND TERMS AS IT RELATES TO SERVICES.

BY MR. RIENZI:

Q. OKAY. IS IT YOUR VIEW THAT THAT CONTRACT REQUIRES FOSTER AGENCIES TO RECRUIT AND CERTIFY ALL COUPLES?

A. YES.

Q. ARE AGENCIES ALLOWED TO HAVE TARGETED RECRUITING?

A. FOR SPECIALIZED BEHAVIORAL HEALTH AND AS WELL AS FOR MEDICALLY FRAGILE CHILDREN.

Q. BEYOND THOSE TWO, IS IT A VIOLATION OF THE CONTRACT THAT AGENCIES HAVE SPECIALIZED RECRUITING?

MR. FIELD: OBJECTION, CALLS FOR A LEGAL

CONCLUSION.

THE COURT: WHAT DO YOU MEAN BY SPECIALIZED RECRUITING?

MR. RIENZI: TARGETED RECRUITING TO PARTICULAR COMMUNITIES.

MR. FIELD: SAME OBJECTION, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: COULD YOU DEFINE WHAT YOU MEAN.

BY MR. RIENZI:

Q. MUST ALL AGENCIES RECRUIT EVERYBODY ALL THE TIME OR ARE THEY ALLOWED TO TARGET PARTICULAR COMMUNITIES TO DO THEIR RECRUITING?

A. SO THEY CAN HAVE A FOCUS ON A CULTURAL OR PARTICULAR COMMUNITY, BUT THEY REQUIRE -- ALL FOSTER CARE AGENCIES ARE REQUIRED TO SERVE ALL MEMBERS OF THE CITY OF PHILADELPHIA WHO PRESENT AND ARE INTERESTED IN BECOMING A FOSTER PARENT.

Q. SO THEY ARE ALLOWED TO RECRUIT IN A TARGETED WAY, IS THAT TRUE?

A. NO.

Q. SO CONCILIO TARGETS ITS RECRUITING TO THE LATINO COMMUNITY, CORRECT?

A. I WOULD NOT CONFUSE SERVING A PARTICULAR COMMUNITY WITH ONLY TARGETING.

Q. YOU DON'T THINK CONCILIO'S RECRUITING IS TARGETED TO THE HISPANIC COMMUNITY?

A. I KNOW FOR A FACT THAT CONCILIO SERVES ALL OF PHILADELPHIA.

Q. THAT WAS NOT MY QUESTION. MY QUESTION IS THEIR RECRUITING EFFORTS ARE TARGETED TO THE HISPANIC COMMUNITY, ARE THEY NOT?

MR. FIELD: OBJECTION TO THE TERM "TARGETED," YOUR HONOR.

THE COURT: WHAT DO YOU MEAN BY "TARGETED"?

MR. RIENZI: I MEAN DO THEY GO OUT TO RECRUIT IN PARTICULAR COMMUNITIES? DO THEY SET OUT TO RECRUIT FOSTER PARENTS IN HISPANIC COMMUNITIES?

THE COURT: I BELIEVE THE ANSWER WAS THEY GO OUT, BUT THEY ARE OBLIGED TO SERVE THE ENTIRE COMMUNITY.

MR. RIENZI: I DON'T THINK SHE ANSWERED THE FIRST PART AS TO WHETHER THEY DO THE RECRUITING IN A TARGETED WAY, WHICH IS WHAT I AM TRYING TO GET AT.

THE COURT: WELL, I THINK YOU NEED TO REPHRASE YOUR QUESTION.

BY MR. RIENZI:

Q. CONCILIO FOCUSES ITS RECRUITING EFFORTS IN THE HISPANIC COMMUNITY, DOESN'T IT?

A. I DON'T THINK I CAN ANSWER THE QUESTION.
Q. YOU DON'T KNOW EITHER WAY?
A. I SAID EARLIER THAT TARGETED DOES NOT EXCLUDE THE ENTIRE COMMUNITY.
Q. YOU DON'T KNOW EITHER WAY WHETHER THEY TARGET A PARTICULAR COMMUNITY, CORRECT?
MR. FIELD: OBJECTION TO THE TERM "TARGETED," YOUR HONOR.
THE COURT: AGAIN --
BY MR. RIENZI:
Q. FOCUS ON A PARTICULAR COMMUNITY.
THE COURT: SHE HAS ANSWERED THE QUESTION AS BEST AS SHE CAN USING HER TERMINOLOGY.
BY MR. RIENZI:
Q. YOU SAID YOU ALSO THINK CATHOLIC VIOLATED THE FAIR PRACTICES ORDINANCE PORTION OF THE CONTRACT?
A. YES, THAT IS CORRECT.
Q. WHY DO YOU THINK THAT?
A. THAT -- ACTUALLY I AM NOT AN ATTORNEY SO THAT WAS A DISCUSSION THAT WE HAD WITH OUR LEGAL COUNSEL IN TERMS OF THEIR CONCLUSIONS AS IT RELATES TO THE REPRESENTATION OF NOT SERVING SAME-SEX COUPLES.
MR. FIELD: YOUR HONOR, I JUST WANT TO OBJECT TO ANY INQUIRY INTO PRIVILEGED AND CONFIDENTIAL ATTORNEY/CLIENT INFORMATION.

THE COURT: YES.

BY MR. RIENZI:

Q. DO YOU THINK FOSTER CARE WORK IS A PUBLIC ACCOMMODATION?

MR. FIELD: OBJECTION, CALLS FOR A LEGAL CONCLUSION.

THE COURT: YES. SUSTAINED.

BY MR. RIENZI:

Q. DO YOU THINK THE FAIR PRACTICE ORDINANCE APPLIES TO THE WORK OF THE DEPARTMENT OF HUMAN SERVICES DOING FOSTER CARE WORK?

MR. FIELD: OBJECTION, CALLS FOR A LEGAL CONCLUSION.

THE COURT: ASK YOUR QUESTION AGAIN.

BY MR. RIENZI:

Q. DO YOU THINK THE FAIR PRACTICES ORDINANCE APPLIES TO THE WORK OF THE DEPARTMENT OF HUMAN SERVICES DOING FOSTER CARE WORK.

THE COURT: AND WAS THERE AN OBJECTION?

MR. FIELD: CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: SUSTAINED.

MR. RIENZI: YOUR HONOR, THE WITNESS HAS TESTIFIED THAT SHE IS IN CHARGE FOR THE DEPARTMENT OF ENSURING THAT THEY COMPLY WITH THE LAW.

THE COURT: I UNDERSTAND THAT, BUT WHAT SHE SAID WAS SHE HAD TO HAVE A CONVERSATION WITH HER COUNSEL -- LEGAL COUNSEL IN ORDER TO FIND OUT EXACTLY WHAT --

MR. RIENZI: UNDERSTOOD.

BY MR. RIENZI:

Q. COMMISSIONER FIGUEROA, YOUR DISCUSSION WITH THE LEGAL COUNSEL, WHICH I AM NOT GOING TO ASK THE SUBSTANCE OF AT ALL, BUT YOUR DISCUSSION WITH LEGAL COUNSEL WAS ABOUT WHETHER CATHOLIC HAD VIOLATED THE CONTRACT AND SPECIFICALLY THE FAIR PRACTICES ORDINANCE PORTION OF THE CONTRACT, CORRECT?

MR. FIELD: OBJECTION. SHE'S ALREADY TESTIFIED TO THE FACT --

THE COURT: OVERRULED.

THE WITNESS: I'M SORRY. CAN YOU REPEAT YOUR QUESTION.

BY MR. RIENZI:

Q. ALL I AM TRYING TO DO IS JUST BE CLEAR ABOUT WHAT YOUR DISCUSSION WITH COUNSEL WAS AND I AM NOT ASKING FOR THE SUBSTANCE OF IT. THAT WAS ABOUT WHETHER CATHOLIC HAD VIOLATED THE FAIR PRACTICE ORDINANCE PORTION OF THE CONTRACT, CORRECT?

A. NO. MY DISCUSSION WITH MY LAW DEPARTMENT WAS, HERE ARE THE ISSUES, AND I AM CONCERNED ABOUT THEIR

ABILITY TO COMPLY WITH THE ENTIRETY OF THEIR CONTRACT.
Q. AND FOR MY NEXT QUESTION, I WANT YOU TO LEAVE THAT DISCUSSION ASIDE BECAUSE I AM NOT ASKING ABOUT THAT DISCUSSION. I AM ASKING YOU ABOUT YOUR JOB AS THE PERSON IN CHARGE OF DHS, AND I AM ASKING ABOUT YOUR JOB PARTICULARLY AS SOMEBODY WHO HAS TESTIFIED THAT IT IS YOUR RESPONSIBILITY TO ENSURE THAT YOUR AGENCY COMPLIES WITH STATE, FEDERAL AND CITY LAW.
A. THAT IS CORRECT.
Q. IS IT YOUR OPINION THAT DHS IS GOVERNED BY THE FAIR PRACTICES ORDINANCE WHEN DOING FOSTER CARE WORK?
A. COULD YOU RESTATE YOUR QUESTION.
Q. IS IT YOUR OPINION THAT DHS, THE AGENCY YOU RUN, IS COVERED BY THE FAIR PRACTICES ORDINANCE WHEN DOING FOSTER CARE WORK?
MR. FIELD: OBJECTION TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION OR INFORMATION LEARNED FROM COUNSEL.
THE COURT: OVERRULED. IF YOU CAN ANSWER.
THE WITNESS: I DON'T FEEL I HAVE LEGAL TRAINING TO ANSWER THAT QUESTION.
BY MR. RIENZI:
Q. HAVE YOU EVER TRAINED YOUR STAFF ON COMPLIANCE WITH THE FAIR PRACTICES ORDINANCE?

A. AS A COMMISSIONER?

Q. YES.

A. NO, I HAVE NOT.

Q. IN YOUR PRIOR TERM AT DHS HAVE YOU EVER TRAINED YOUR STAFF ON COMPLIANCE WITH THE FAIR PRACTICES ORDINANCE?

A. AS A DEPUTY COMMISSIONER, NO.

Q. IN ANY CONTEXT AT DHS HAVE YOU EVER TRAINED STAFF ON THAT ISSUE?

MR. FIELD: YOU MEAN -- YOUR HONOR, CAN WE JUST FIND OUT WHETHER HE MEANS HER PERSONALLY OR HER DEPARTMENT?

THE COURT: HER PERSONALLY.

BY MR. RIENZI:

Q. I WILL START WITH YOU PERSONALLY.

A. I'M SORRY. I AM CONFUSED. CAN YOU START OVER AGAIN.

Q. SURE. AND I WILL BACK UP. I APOLOGIZE.

WHAT I AM TRYING TO GET A SENSE OF IS WHETHER WHILE YOU ARE AT DHS YOU ALL ARE ACTING LIKE YOU ARE COVERED BY THE FAIR PRACTICES ORDINANCE. SO MY QUESTION IS -- I WILL START WITH NOW AS COMMISSIONER. AS COMMISSIONER, HAVE YOU DONE ANYTHING TO MAKE SURE THAT PEOPLE AT DHS FOLLOW THE FAIR PRACTICES ORDINANCE WHEN DOING FOSTER CARE WORK?

A. NOT TO MY RECOLLECTION.

Q. AND IN ALL OF YOUR TIME AT DHS, NOW OVER THE COUPLE OF DIFFERENT STINTS THAT YOU HAVE HAD, DO YOU RECALL ANY DISCUSSIONS WITH ANYBODY ABOUT WHETHER DHS WAS COVERED BY THE FAIR PRACTICES ORDINANCE WHEN DOING FOSTER CARE WORK?

A. I ANSWERED THAT IT WAS WITH OUR LEGAL COUNSEL.

Q. YES. I WANT YOU TO LEAVE ASIDE THAT DISCUSSION. OTHER THAN THAT, ARE YOU AWARE OF ANY OTHER DISCUSSION ABOUT WHETHER DHS IS COVERED BY THE FAIR PRACTICES ORDINANCE WHEN DOING FOSTER CARE WORK?

A. I HAVE NOT HAD A REASON TO.

Q. DHS SOMETIMES CONSIDERS RACE WHEN MAKING A FOSTER CARE PLACEMENT?

A. NO.

Q. DHS NEVER CONSIDERS A REQUEST FROM A PARENT TO FOSTER A CHILD OF A PARTICULAR RACE WHEN PLACING CHILDREN?

A. THAT WOULD BE THE PARENT'S CHOICE AND PERSPECTIVE TO GIVE THAT REQUEST.

Q. AND WHEN DHS IS MEETING THAT PARENT'S CHOICE, IT DOES CONSIDER RACE WHEN MAKING FOSTER CHILD PLACEMENTS?

A. WE CAN'T ALWAYS OFFER THE ABILITY TO PROVIDE THE CONSIDERATION THAT HAS BEEN PRESENTED BY THE PARENT.

Q. UNDERSTOOD, BUT SOMETIMES YOU DO, CORRECT?

A. NO, I CAN'T ANSWER THAT.

Q. YOU CAN'T ANSWER IT OR YOU DON'T DO IT?

I WILL BREAK IT APART. ARE YOU SAYING THAT DHS NEVER CONSIDERS THE RACE OF A CHILD WHEN MAKING A PLACEMENT?

A. I AM SAYING THAT WE CONSIDER THE REQUEST OF THE RESOURCE PARENT AND THAT THE OTHER FACTOR THAT WE HAVE TO CONSIDER IS THE BEST INTEREST OF THE CHILD. WHETHER THE BEHAVIOR IS -- COINCIDES WITH THE ENVIRONMENT IN THE HOUSEHOLD, WHETHER OR NOT THERE CAN BE NO OTHER CHILD IN THE HOME, WHETHER OR NOT THE CHILD IS MEDICALLY FRAGILE. SO THERE ARE A LOT OF CONSIDERATIONS AND THEY ARE ALL DRIVEN BY SAFETY.

Q. I AM TRYING TO GET YOU TO FOCUS ON RACE.

A. RIGHT. AND I AM TELLING YOU THE PRIORITY OF THE DEPARTMENT --

Q. I UNDERSTAND THAT. I AM ASKING --

A. -- IS CHILDREN'S SAFETY.

Q. I UNDERSTAND THAT. BUT I AM ASKING YOU A QUESTION ABOUT WHETHER THE DEPARTMENT EVER CONSIDERS RACE WHEN MAKING A PLACEMENT.

THE COURT: WHEN YOU SAY "CONSIDER," DO YOU MEAN THAT'S ONE OF THE FACTORS OR ONE OF MANY FACTORS?

BY MR. RIENZI:

Q. YES, JUST CONSIDER IT AS ONE OF THE FACTORS. SO YOU CONSIDER RACE WHEN MAKING PLACEMENTS SOMETIMES?

A. THERE'S NO FORMALIZED WAY FOR US TO DO THAT.

Q. DO YOU DO IT?

A. I DON'T KNOW THAT I CAN ANSWER THAT.

Q. YOU DON'T KNOW WHETHER YOUR DEPARTMENT EVER CONSIDERS RACE IN MAKING A FOSTER CHILD PLACEMENT? IS THAT YOUR TESTIMONY?

MR. FIELD: ASKED AND ANSWERED, YOUR HONOR.

MR. RIENZI: YOUR HONOR, WITH ALL DUE RESPECT, IT'S NOT ACTUALLY BEEN ANSWERED. I AM TRYING TO GET TO THE ANSWER.

THE COURT: OVERRULED.

THE WITNESS: CAN YOU REPEAT IT.

BY MR. RIENZI:

Q. SURE. IS IT YOUR TESTIMONY THAT THE DEPARTMENT OF HUMAN SERVICES NEVER CONSIDERS RACE WHEN MAKING A CHILD PLACEMENT?

A. I'M SORRY. IT SOUNDS LIKE YOU'RE USING A DOUBLE NEGATIVE. CAN YOU ASK IT MORE DIRECTLY.

Q. SURE. DOES THE DEPARTMENT OF HUMAN SERVICES EVER CONSIDER RACE WHEN MAKING A FOSTER CARE PLACEMENT?

A. I THINK WHAT I HAVE ANSWERED BEFORE, AS ONE OF THE MANY FACTORS THAT, YES.

Q. SO YES, IT DOES, BUT THERE ARE OTHER FACTORS ALSO CONSIDERED?

A. THAT'S CORRECT.

Q. HAVE YOU EVER HAD ANY DISCUSSIONS WITH ANYBODY AS TO WHETHER YOU ARE VIOLATING FAIR PRACTICES ORDINANCE TO CONSIDER RACE IN A PUBLIC ACCOMMODATION?

A. IT HAS NOT COME TO MY ATTENTION.

MR. FIELD: ASSUMES FACTS NOT IN THE RECORD, YOUR HONOR.

BY MR. RIENZI:

Q. DOES DHS SOMETIMES CONSIDER DISABILITY WHEN MAKING CHILD PLACEMENTS IN FOSTER CARE?

A. ABSOLUTELY.

Q. HAVE YOU EVER CONSIDERED WHETHER YOU ARE VIOLATING THE FAIR PRACTICES ORDINANCE IF FOSTER CARE IS A PUBLIC ACCOMMODATION?

A. WE ACTUALLY HAVE SPECIALIZED PROVIDERS --

MR. FIELD: OBJECTION.

THE WITNESS: -- THAT ONLY WORK WITH THE POPULATION YOU HAVE ADDRESSED.

THE COURT: OVERRULED.

BY MR. RIENZI:

Q. AND THAT WOULD BE A VIOLATION OF THE FAIR PRACTICES ORDINANCE IF FOSTER CARE WERE A PUBLIC ACCOMMODATION, WOULDN'T IT?

MR. FIELD: OBJECTION, CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. YOU KNOW THAT SOMETIMES FOSTER AGENCIES THEMSELVES CONSIDER RACE WHEN MAKING FOSTER CARE PLACEMENTS?

A. I CAN'T ANSWER THAT. I DON'T KNOW.

Q. YOU DON'T KNOW WHETHER ANY AGENCIES CONSIDER RACE WHEN MAKING PLACEMENTS?

A. I HAVE NEVER HAD THAT DISCUSSION --

MR. FIELD: ASSUMES FACTS NOT IN THE RECORD REGARDING PLACEMENTS, YOUR HONOR.

MR. RIENZI: IT'S A QUESTION ABOUT WHETHER IT HAPPENS.

MR. FIELD: THE WITNESS HAS NOT TESTIFIED AS TO WHETHER FOSTER CARE AGENCIES PROVIDE PLACEMENTS.

THE COURT: SHE ANSWERED.

BY MR. RIENZI:

Q. WHO AT DHS WOULD KNOW THAT?

THE COURT: WHO?

BY MR. RIENZI:

Q. WHO IN DHS WOULD KNOW WHETHER FOSTER AGENCIES CONSIDER RACE IN MAKING PLACEMENTS?

THE COURT: WHAT DOES THAT HAVE TO DO

WITH THIS CASE?

MR. RIENZI: PLENTY, YOUR HONOR. THE CLAIM IS THAT FOSTER CARE IS A PUBLIC ACCOMMODATION SUBJECT TO THE FAIR PRACTICES ORDINANCE. THE COMMISSIONER HAS JUST TOLD ME THAT THE DEPARTMENT SOMETIMES CONSIDERS RACE WHEN MAKING PLACEMENTS.

THE COURT: AS ONE OF MANY OTHER FACTORS.

MR. RIENZI: WHICH WOULD BE A VIOLATION OF THE FAIR PRACTICES ORDINANCE IF THEY ACTUALLY BELIEVED IT.

THE COURT: THAT IS YOUR OPINION.

MR. RIENZI: CORRECT. AND IT'S ACTUALLY ALSO THE FAIR PRACTICES ORDINANCE, YOUR HONOR. I AM SIMPLY TRYING TO GET A SENSE OF HOW THEY RUN THEIR FOSTER CARE PROGRAM AND WHETHER THEY ALLOW OTHER CONSIDERATIONS THAT ARE NOT CONSISTENT WITH THIS APPARENTLY NEW VIEW THAT FOSTER CARE IS A PUBLIC ACCOMMODATION. SO I AM TRYING TO FIND OUT HOW THE DEPARTMENT HANDLES OTHER THINGS THAT IF THEIR STORY WERE ACTUALLY CORRECT WOULD BE VIOLATIONS OF THE FAIR PRACTICES ORDINANCE.

THE COURT: WELL, THAT IS NOT -- THE FACT THAT YOU CONSIDER A PUBLIC ACCOMMODATION AND WHAT IS REQUIRED BY THE FAIR PRACTICES ACT IS NOT WHAT THIS CASE IS BASED ON, THE ISSUE OF RACE.

MR. RIENZI: YOUR HONOR, SHE TESTIFIED THAT THE VIOLATION -- WAS VIOLATION OF THE FAIR PRACTICES ORDINANCE BECAUSE IT'S THEIR VIEW THAT FOSTER CARE IS A PUBLIC ACCOMMODATION COVERED BY THE FAIR PRACTICES ORDINANCE.

THE COURT: SHE HAS NOT TESTIFIED TO THAT.

MR. RIENZI: SHE HAS TESTIFIED THAT THAT WAS ONE OF THE TWO BREACHES OF THE FAIR PRACTICES ORDINANCE, IS MY UNDERSTANDING.

MR. FIELD: SHE TESTIFIED REGARDING INFORMATION PROVIDING BY HER COUNSEL, YOUR HONOR.

THE COURT: THAT IS CORRECT. SHE HAS NOT TESTIFIED TO THAT.

BY MR. RIENZI:

Q. MS. FIGUEROA, DID YOU TELL OTHER PEOPLE THAT CATHOLIC HAD VIOLATED THE FAIR PRACTICES ORDINANCES PART OF THAT CONTRACT?

MR. FIELD: YOUR HONOR, I JUST OBJECT TO THE EXTENT THAT THE QUESTION REQUIRES --

THE COURT: SUSTAINED. SUSTAINED.

BY MR. RIENZI:

Q. COMMISSIONER FIGUEROA, I AM NOT ASKING YOU TO TELL ME ANYTHING ABOUT ANY CONVERSATIONS YOU HAD WITH YOUR LAWYERS.

MR. FIELD: OR OTHER CITY EMPLOYEES, YOUR HONOR.

THE COURT: I SUSTAINED THE OBJECTION.

BY MR. RIENZI:

Q. DID YOU TALK TO ANYBODY WHO DOES NOT WORK FOR THE CITY AND TELL THEM THAT YOU THOUGHT CATHOLIC HAD VIOLATED THE FAIR PRACTICES ORDINANCE?

A. NO.

Q. YOU DIDN'T TELL THAT TO CATHOLIC?

A. IN OUR -- ACTUALLY IT WAS OUR LEGAL COUNSEL THAT SPOKE TO THEIR LEGAL COUNSEL IN THE MEETING. THE DIRECT QUESTION CAME FROM CATHOLIC SOCIAL SERVICES COUNSEL AND OUR COUNSEL PRESENT RESPONDED.

Q. HAVE YOU EVER INSTRUCTED ANYBODY AT DHS TO FREEZE REFERRALS AT ANY AGENCY OVER A VIOLATION OF THE FAIR PRACTICES ORDINANCE?

A. CATHOLIC SOCIAL SERVICES.

Q. OTHER THAN CATHOLIC SOCIAL SERVICES?

A. NO.

Q. HAVE YOU EVER INFORMED THE 30 FOSTER CARE AGENCIES IN THE CITY THAT YOU BELIEVE THEIR PROVISION OF FOSTER CARE IS GOVERNED BY THE FAIR PRACTICES ORDINANCE?

A. IT'S IN THE CONTRACT.

Q. OTHER THAN THE LANGUAGE IN THE CONTRACT, HAVE YOU EVER INFORMED THE AGENCIES IN THE CITY THAT YOU

THINK THEY HAVE OBLIGATIONS UNDER THE FAIR PRACTICES ORDINANCE WHEN DOING FOSTER CARE WORK?

A. WE ALWAYS REMIND INDIVIDUALS TO MEET THE STANDARDS IN THEIR CONTRACTS.

Q. I AM SAYING OTHER THAN THE CONTRACT, HAVE YOU EVER TOLD AGENCIES TO DO THAT?

A. BASED ON THE NATURE OF THE CONTRACT DISCUSSIONS, THEN I WOULD SAY YES BECAUSE THEY ALL SIGN THEIR CONTRACTS AS I DID.

Q. I AM JUST ASKING YOU, OTHER THAN THE CONTRACT, DO YOU EVER TELL THEM THEY MUST FOLLOW THE FAIR PRACTICES ORDINANCE?

A. NOT THAT I RECALL.

Q. YOU ARE NOT AWARE OF ANY TRAININGS THAT YOUR AGENCY HAS DONE TO TELL PEOPLE THAT?

A. NOT THAT I AM AWARE OF.

Q. SO IN ALL OF YOUR TIME AT DHS THE FIRST TIME YOU EVER HEARD ANYBODY SAY FOSTER CARE WAS A PUBLIC ACCOMMODATION UNDER THE FAIR PRACTICES ORDINANCE WAS IN THIS PARTICULAR DISPUTE, CORRECT?

A. AGAIN, THAT WAS IN CONVERSATION WITH MY COUNSEL.

Q. AND I AM ASKING YOU SINCE I KNOW YOU ALSO OBSERVED NONPRIVILEGED CONVERSATIONS BETWEEN YOUR COUNSEL AND CATHOLIC. SO I AM NOT ASKING YOU TO TELL ME ANYTHING ABOUT WHAT YOUR LAWYER TOLD YOU. PRIOR TO

MARCH OF 2018, YOU HAD NEVER TAKEN THE POSITION THAT FOSTER CARE WORK WAS A PUBLIC ACCOMMODATION UNDER THE FAIR PRACTICES ORDINANCE, CORRECT?

MR. FIELD: OBJECTION TO THE CHARACTERIZATION OF TAKING A POSITION, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. YOU ARE NOT AWARE OF DHS EVER TELLING ANYONE THAT FOSTER CARE WAS A PUBLIC ACCOMMODATION PRIOR TO 2018, CORRECT?

A. WE NEVER NEEDED TO PRIOR.

Q. THAT'S NOT MY QUESTION. MY QUESTION IS WHETHER YOU ARE AWARE OF ANYONE AT DHS EVER TAKING THAT POSITION PRIOR TO 2018?

MR. FIELD: OBJECTION TO THE SCOPE OF THIS, YOUR HONOR. SHE HAS ONLY BEEN THE COMMISSIONER SINCE THE FALL OF 2016.

THE COURT: MY UNDERSTANDING IS IT'S IN THE CONTRACT.

MR. RIENZI: I UNDERSTAND THAT THAT IS THEIR CLAIM, YOUR HONOR, AND I'M SIMPLY SAYING IF YOU ARE RUNNING A LARGE SYSTEM, I AM CURIOUS TO KNOW WHETHER THEY SAID IT TO ANYBODY ELSE.

THE COURT: WHEN YOU SAY "SAID IT TO ANYBODY ELSE," I MEAN THE FACT THAT IT'S LAID OUT IN THE

CONTRACT --

MR. RIENZI: YOUR HONOR, THE WORDS "FAIR PRACTICES ORDINANCE" APPEAR IN THE CONTRACT. WE HAVE A SERIOUS DISPUTE WITH THE CITY AS TO WHETHER THAT MAKES FOSTER CARE A PUBLIC ACCOMMODATION.

THE COURT: I CAN APPRECIATE THAT. ALL I AM SAYING IS, THE FACT THAT IT IS IN THE CONTRACT, I DON'T KNOW THAT IT'S NECESSARY THAT IT HAS TO BE SAID ANY OTHER WAY.

MR. RIENZI: YOUR HONOR, I THINK THAT'S A PERFECTLY FAIR POSITION TO TAKE, AND MAYBE MS. FIGUEROA IS GOING TO SAY THAT. BUT MY QUESTION IS JUST WHETHER SHE IS AWARE OF ANYPLACE ELSE THAT THEY HAVE TAKEN THE POSITION THAT FOSTER CARE IS A PUBLIC ACCOMMODATION. SHE HAS BEEN THERE FOR MANY YEARS. IF THE ANSWER IS NO, THEN THAT'S FINE. I BELIEVE THE ANSWER WAS --

BY MR. RIENZI:

Q. WAS YOUR ANSWER PREVIOUSLY IT HAS NOT COME UP BEFORE? WAS THAT YOUR ANSWER?

MR. FIELD: AGAIN, YOUR HONOR, I JUST OBJECT BECAUSE HE REFERRED AGAIN TO THIS CHARACTERIZATION OF TAKING THE POSITION, WHICH IS A LEGAL CONCLUSION.

BY MR. RIENZI:

Q. YOU HAVE WORKED AT DHS FOR A TOTAL --

A. WELL, IN MY CURRENT CAPACITY?
Q. TOTAL.
A. ALMOST FOUR YEARS.
Q. PRIOR TO 2018 YOU HAD NEVER HEARD ANYBODY AT DHS SAY THAT FOSTER CARE WORK WAS A PUBLIC ACCOMMODATION, CORRECT?
A. I BELIEVE I ANSWERED THIS.
Q. I AM ASKING FOR A YES OR NO ANSWER. PRIOR TO 2018, YOU HAD NEVER HEARD ANYBODY CALL FOSTER CARE A PUBLIC ACCOMMODATION, CORRECT?
MR. FIELD: I OBJECT TO THE EXTENT IT CALLS FOR A PRIVILEGED COMMUNICATION, YOUR HONOR.
THE COURT: OVERRULED. YOU MAY ANSWER.
THE WITNESS: I BELIEVE I ANSWERED THAT PRIOR TO THIS INCIDENT IT HAD NOT AROSE.
BY MR. RIENZI:
Q. SO NO, YOU HAD NEVER HEARD THAT?
A. NO.
Q. OKAY. THANK YOU.
I BELIEVE YOU TESTIFIED ON TUESDAY THAT YOU HAD HEARD AND AGREED WITH MS. ALI'S TESTIMONY, IS THAT CORRECT?
A. THAT IS CORRECT.
Q. AND YOU KNOW THAT MS. ALI STATED A -- WHAT SHE SAID WAS A RULE THAT IF A QUALIFIED PROSPECTIVE FOSTER

FAMILY WANTS A HOME STUDY PERFORMED BY A PARTICULAR FOSTER AGENCY, THAT AGENCY MUST PROVIDE THE HOME STUDY. DO YOU RECALL THAT?

MR. FIELD: OBJECTION. HE IS MISCHARACTERIZING MS. ALI'S TESTIMONY.

THE COURT: OVERRULED.

BY MR. RIENZI:

Q. DO YOU RECALL MS. ALI TESTIFYING ABOUT A RULE THAT IF A QUALIFIED PROSPECTIVE FOSTER FAMILY WANTS A HOME STUDY PERFORMED BY A PARTICULAR AGENCY, THAT AGENCY MUST PROVIDE THE HOME STUDY?

A. I HAVE -- IN TERMS OF RULES, IS THAT THE -- WAS THAT THE LANGUAGE THAT MS. ALI USED?

THE COURT: I THINK SHE USED POLICY.

BY MR. RIENZI:

Q. POLICY. I'M NOT -- YOU CAN CALL IT WHATEVER YOU LIKE. I'M LOOKING FOR --

A. I THINK LANGUAGE IS IMPORTANT.

Q. I DO TOO. THANK YOU.

DID YOU HEAR MS. ALI TESTIFY ABOUT THAT POLICY?

A. I WAS HERE, YES. I HEARD HER TESTIFY ON THE POLICY.

Q. DO YOU AGREE WITH HER TESTIMONY ON THAT POLICY?

A. YES, THAT PARENTS CHOOSE WHICH ORGANIZATION THEY

WOULD LIKE TO WORK WITH.

Q. AND THAT AN AGENCY MUST PROVIDE THE HOME STUDY IF A FAMILY WANTS THE AGENCY TO PROVIDE THE HOME STUDY, CORRECT?

A. YES.

Q. YOU HAVE NEVER DONE ANY TRAINING FOR AGENCIES ABOUT THAT POLICY, HAVE YOU?

A. IN ALL SINCERITY, IT IS A HUGE DEPARTMENT AND A LOT OF THE CHILD WELFARE OPERATIONS ARE UNDER MS. ALI, SO I WOULD NOT BE ABLE TO ANSWER THE QUESTION.

Q. YOU ARE NOT AWARE OF ANY TRAINING PROVIDED TO THE AGENCIES ABOUT THAT POLICY, CORRECT?

A. I JUST ANSWERED THAT, AGAIN, I OVERSEE A VERY LARGE DEPARTMENT, AND THOSE DUTIES AND RESPONSIBILITIES, I RELY ON THE SUPPORT OF DEPUTY COMMISSIONER ALI. SO I'M NOT IN A POSITION TO BE ABLE TO ANSWER THAT.

Q. YOU CERTAINLY NEVER INSTRUCTED HER TO MAKE SURE AGENCIES ARE TRAINED ON THAT POLICY, CORRECT?

A. WHAT POLICY?

Q. THE POLICY THAT FOSTER AGENCIES MUST PROVIDE HOME STUDIES TO FAMILIES WHO WANT THEM. YOU HAVE NOT INSTRUCTED HER TO MAKE SURE THAT AGENCIES ARE TRAINED ON THAT POLICY, CORRECT?

A. THAT'S CORRECT.

Q. AND YOU HAVE DONE NOTHING TO TRAIN YOUR OWN

STAFF ON THAT POLICY, CORRECT?

A. ARE WE REFERRING TO THE POLICY OF THE HOME STUDY?

Q. THE POLICY THAT AN AGENCY MUST PROVIDE A HOME STUDY. YOU HAVE NEVER DONE ANYTHING TO TRAIN YOUR OWN STAFF ON THAT POLICY, CORRECT?

A. NO, BECAUSE IT IS REFLECTED IN THE CONTRACT.

Q. OTHER THAN YOUR CLAIM THAT IT IS IN THAT CONTRACT, HAVE YOU EVER SEEN THIS POLICY WRITTEN DOWN ANYPLACE?

A. I'M SURE IT EXISTS IN A LOT OF DIFFERENT PLACES. I DON'T KNOW THAT I CAN SAY -- YOU KNOW, THERE'S REFERENCE TO THE WEBSITE, ET CETERA. SO I DON'T KNOW THAT I COULD NAME OTHER PLACES IN WHICH THAT WOULD APPEAR.

Q. OKAY. DO YOU KNOW THAT IT APPEARS IN OTHER PLACES OR ARE YOU JUST SAYING IT MIGHT AND YOU DON'T KNOW?

A. IT MIGHT AND I DON'T KNOW.

MR. RIENZI: PERMISSION TO APPROACH, YOUR HONOR.

THE COURT: YES.

BY MR. RIENZI:

Q. I AM HANDING THE WITNESS A COPY OF A DOCUMENT LABELED PLAINTIFF'S EXHIBIT 16. AND I ASK YOU IF YOU

HAVE SEEN THAT DOCUMENT BEFORE?
A. THERE'S A STICKER OVER PART OF IT, SO I AM ASSUMING THAT SAYS THE DEPARTMENT OF HUMAN SERVICES.
Q. I WILL SHOW YOU A COPY WITHOUT THE EXHIBIT STICKER, JUST SO YOU CAN SEE THAT. HAVE YOU SEEN THAT BEFORE?
A. YES, THIS IS ACTUALLY VERY DATED.
Q. IT STILL APPEARS ON YOUR WEBSITE, CORRECT?
A. I DON'T KNOW.
Q. DHS.PHILA.GOV IS YOUR WEBSITE?
A. THAT'S CORRECT.
Q. DO YOU RECOGNIZE THIS DOCUMENT?
A. I AM FAMILIAR WITH THIS DOCUMENT.
Q. WHAT IS IT?
A. IT'S THE FOSTER PARENT HANDBOOK.
Q. AND WHAT IS THE FOSTER PARENT HANDBOOK?
A. IT'S A GUIDE FOR PROSPECTIVE PARENTS.
Q. I WOULD LIKE YOU TO TURN TO THE PINK STICKY NOTE, WHICH IS ON PAGE 2, THE FREQUENTLY ASKED QUESTIONS PAGE. DO YOU SEE THE SECTION SAYING: HOW DO I BECOME A FOSTER PARENT?
A. YES.
Q. CAN YOU JUST TAKE A MOMENT AND -- WELL, I WOULD LIKE TO DIRECT YOUR ATTENTION TO THE SECOND SENTENCE THERE. IT SAYS: THERE ARE MANY FOSTER CARE AGENCIES IN

PHILADELPHIA THAT CAN HELP YOU THROUGH THIS PROCESS. DO YOU SEE THAT?

A. THAT IS CORRECT.

Q. AND -- I APOLOGIZE. IT SAYS: THE FIRST STEP IS TO BECOME LICENSED AS A FOSTER PARENT. THERE ARE MANY FOSTER CARE AGENCIES IN PHILADELPHIA THAT CAN HELP YOU THROUGH THIS PROCESS.

A. THAT'S CORRECT.

Q. AND THAT'S CORRECT. I MEAN, IT'S NOT JUST CORRECT WHAT IT SAYS. YOU AGREE IT IS A FACTUAL MATTER, CORRECT?

A. I AGREE, YES.

Q. THEN IT SAYS: DHS DOES NOT LICENSE OR APPROVE FOSTER PARENTS, IS THAT CORRECT?

A. THAT IS CORRECT.

Q. IT'S NOT THE CITY'S JOB TO LICENSE OR APPROVE FOSTER PARENTS?

A. PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES LICENSES FOSTER PARENTS.

Q. IT SAYS: DHS DOES NOT LICENSE OR APPROVE FOSTER PARENTS, BUT IS PROVIDING THIS HANDBOOK AS A GENERAL GUIDE TO THE OVERALL PROCESS OF FOSTER PARENTING, INCLUDING RIGHTS, RESPONSIBILITIES AND TIPS FOR SUCCESS. IS THAT WHAT IT SAYS?

A. YEP.

Q. NOTHING IN THE HOW I -- HOW DO I BECOME A FOSTER PARENT SECTION SAYS THAT FOSTER PARENTS HAVE A RIGHT TO RECEIVE A HOME STUDY FROM WHATEVER AGENCY THEY PICK, DOES IT?

A. NO, BUT I THINK IT'S IMPORTANT TO KNOW THAT THIS IS A GENERAL GUIDE TO THE OVERALL PROCESS OF FOSTER PARENTING.

Q. GREAT. AND THAT GENERAL GUIDE DOES NOT SAY YOU HAVE A RIGHT TO A HOME STUDY FROM ANY AGENCY YOU WANT, DOES IT?

A. BECAUSE IT'S A GENERAL GUIDE, IT MIGHT NOT INCLUDE ALL THE DETAIL NECESSARY.

Q. IT DOES NOT INCLUDE THAT STATEMENT, CORRECT?

A. WHAT STATEMENT?

Q. THE STATEMENT THAT YOU HAVE A RIGHT TO A HOME STUDY FROM WHATEVER AGENCY YOU PICK.

MR. FIELD: YOUR HONOR, I JUST OBJECT. THE GENERAL GUIDE IS A --

THE COURT: OVERRULED.

MR. FIELD: -- MANY-PAGE DOCUMENT AND HE IS ASKING ABOUT THE ENTIRETY OF IT.

MR. RIENZI: I AM NOT.

BY MR. RIENZI:

Q. I AM ASKING ABOUT THE "HOW DO I BECOME A FOSTER PARENT" SECTION.

A. I DON'T KNOW WHAT ELSE THAT -- RIGHT NOW OFF THE TOP OF MY HEAD IN THE 74-PAGE DOCUMENT THAT MIGHT BE FOUND BESIDES PAGE 2. CAN YOU REPEAT THE STATEMENT YOU ARE ASKING ME TO CONFIRM?

Q. THE "HOW DO I BECOME A FOSTER PARENT" SECTION DOES NOT SAY THAT YOU HAVE A RIGHT TO GET A HOME STUDY FROM WHATEVER AGENCY YOU WANT, DOES IT?

A. IN THIS GUIDE, IT DOES NOT.

Q. OKAY. IT SAYS: DHS DOES NOT LICENSE OR APPROVE FOSTER PARENTS. WHO DOES?

A. THE PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES.

Q. SO PENNSYLVANIA DHS IS THE ONE WHO LICENSES AND APPROVES FOSTER PARENTS?

A. THAT'S CORRECT.

Q. DO AGENCIES PLAY A ROLE IN THAT?

A. BASED ON THE INFORMATION THAT THEY PROVIDE IS HOW A PARENT BECOMES LICENSED AND APPROVED.

Q. WHO DO THEY PROVIDE THAT INFORMATION TO?

A. YOU ARE GETTING INTO THE REAL TECHNICAL OPERATIONAL PART, SO I WOULD HAVE TO RELY ON MY DEPUTY COMMISSIONER TO ANSWER THAT.

Q. THEY DON'T PROVIDE IT TO YOU, DO THEY?

A. NO. THEY HAVE TO GO THROUGH THE STATE PROCESS. YEP.

Q. AND YOU HAVE NOTHING TO DO WITH THAT PROCESS, DO

YOU?

A. NO.

Q. YOUR OFFICE DOES NOT REVIEW HOME STUDIES?

A. I CAN'T ANSWER THAT.

Q. I'M SORRY. YOU SAID YOU CAN'T ANSWER THAT?

A. I DON'T KNOW.

Q. WHEN AGENCIES DO HOME STUDIES, THEY ARE NOT ACTING ON BEHALF OF THE CITY, ARE THEY?

MR. FIELD: OBJECTION, CALLS FOR A LEGAL CONCLUSION.

THE COURT: OVERRULED.

THE WITNESS: THE CITY PAYS FOR THE CONTRACT FOR THEM TO DELIVER THE SERVICE. THE LICENSING COMPONENT IS HELD BY THE STATE. THEY CAN'T DO THE WORK UNLESS THEY HAVE A CONTRACT WITH THE CITY OF PHILADELPHIA.

BY MR. RIENZI:

Q. WHEN AGENCIES DO HOME STUDIES, THEY ARE NOT ACTING ON BEHALF OF THE CITY, ARE THEY?

THE COURT: SHE ANSWERED THAT QUESTION. WHEN YOU SAY ON BEHALF OF, IT'S NECESSARY FOR THEM TO GET A LICENSE, BUT THEY CAN'T --

MR. RIENZI: I AM SIMPLY TRYING TO FIGURE OUT IF THIS IS THE CITY'S WORK THAT THE AGENCIES ARE DOING OR IF IT'S SOMEBODY ELSE'S WORK.

MR. FIELD: I BELIEVE SHE JUST ANSWERED THAT QUESTION, YOUR HONOR.

THE COURT: SHE DID ANSWER THE QUESTION.

MR. RIENZI: OKAY.

BY MR. RIENZI:

Q. DO YOU STILL HAVE THE CONTRACT UP THERE?

A. I DO.

Q. TURN TO PAGE 86 OF THE CONTRACT, PLEASE.

A. I GOT IT.

Q. DO YOU SEE SECTION 9.1?

A. I DO.

Q. CAN YOU READ THE FIRST SENTENCE OF THAT SECTION TO ME, PLEASE?

A. PROVIDER IS AN INDEPENDENT CONTRACTOR AND SHALL NOT IN ANY WAY FOR ANY PURPOSES BE DEEMED OR INTENDED TO BE AN EMPLOYEE OR AGENT OF THE CITY.

Q. AND THAT IS CORRECT AS YOUR UNDERSTANDING, RIGHT?

MR. FIELD: OBJECTION TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: THAT'S CORRECT UNDER ARTICLE 9, THE INDEPENDENT CONTRACTOR INDEMNIFICATION LITIGATION COOPERATION.

BY MR. RIENZI:

Q. THANK YOU.

MR. RIENZI: PERMISSION TO APPROACH, YOUR HONOR.

THE COURT: YES.

BY MR. RIENZI:

Q. HANDING THE WITNESS A DOCUMENT LABELED PLAINTIFF'S EXHIBIT 17.

COMMISSIONER FIGUEROA, ACTUALLY IF I CAN JUST TURN YOU BACK TO THE FOSTER PARENT HANDBOOK FOR ONE MORE SECOND. IT IS THE PREVIOUS EXHIBIT. IN THE SECOND PARAGRAPH THERE YOU SEE THAT THE CITY IS REFERRING PEOPLE TO THE PENNSYLVANIA STATE FOSTER PARENT ASSOCIATION?

A. ARE WE BACK TO THE ORIGINAL TAB?

Q. I'M SORRY. I AM BACK TO THE FOSTER PARENT HANDBOOK.

A. YES. WHAT PAGE?

Q. SAME PAGE. PAGE 2, THE FREQUENTLY ASKED QUESTIONS. DO YOU SEE THAT DHS IS REFERRING PEOPLE TO THE PENNSYLVANIA STATE FOSTER PARENT ASSOCIATION?

A. HERE IN THE MIDDLE?

Q. SECOND PARAGRAPH?

A. YES. YEP.

Q. AND DHS SAYS THAT THAT ENTITY CAN ALSO GIVE YOU MORE INFORMATION AND ASSIST YOU AS YOU DECIDE WHICH

AGENCY IS THE BEST MATCH FOR YOU TO WORK WITH FOR YOUR HOME STUDY AND LICENSE. DO YOU SEE THAT?

A. I'M SORRY. WHERE ARE YOU READING FROM?

Q. THE SECOND PARAGRAPH ON PAGE 2?

A. YES.

Q. IT SAYS THAT THE PENNSYLVANIA STATE --

A. GOT IT. YES.

Q. -- FOSTER PARENT ASSOCIATION CAN ALSO GIVE YOU MORE INFORMATION AND ASSIST YOU AS YOU DECIDE WHICH AGENCY IS THE BEST MATCH FOR YOU TO WORK WITH FOR YOUR HOME STUDY AND LICENSE. DO YOU SEE THAT?

A. YES.

Q. ARE YOU FAMILIAR WITH THEN THE NEXT DOCUMENT I GAVE YOU, THE RESOURCE PARENT MANUAL?

A. I AM ACTUALLY NOT FAMILIAR WITH IT.

Q. OKAY. ARE YOU AWARE THAT THE PENNSYLVANIA STATE FOSTER PARENT ASSOCIATION CHANGED ITS NAME TO THE PENNSYLVANIA STATE RESOURCE FAMILY ASSOCIATION?

A. NO.

Q. I WOULD LIKE TO DIRECT YOUR ATTENTION TO PAGE 7 OF THAT RESOURCE PARENT MANUAL. IT SAYS: REQUIREMENTS IN PENNSYLVANIA TO BE A RESOURCE PARENT.

A. YES.

Q. ARE YOU FAMILIAR WITH THE REGULATIONS THAT APPEAR ON THAT PAGE?

A. I AM FAMILIAR WITH THEM. I WOULD NOT SAY I COULD CITE THEM.

Q. THOSE ARE THE STATE REGULATIONS FOR AN AGENCY APPROVING A FOSTER FAMILY, CORRECT?

A. YES, CORRECT.

Q. AND DO YOU SEE UNDER HEADING NUMBER 1 WHERE IT SAYS: NOTE THAT THESE ARE MINIMUM REQUIREMENTS AND INDIVIDUAL AGENCIES WILL VARY THEIR POLICIES. DO YOU SEE THAT?

A. I DO SEE THAT.

Q. AND THAT IS CORRECT, ISN'T IT?

MR. FIELD: OBJECTION TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: YES, OVERRULED.

THE WITNESS: AND CLARITY -- COULD YOU CLARIFY THE INTERPRETATION OF "INDIVIDUAL AGENCY" FOR THIS LINE OF QUESTIONING?

BY MR. RIENZI:

Q. I UNDERSTAND THEM TO BE TALKING ABOUT FOSTER CARE AGENCIES. AND SO THE WAY I AM LOOKING AT IT IS IN EXHIBIT 16 THE CITY TELLS PEOPLE TO GO TO THIS FOSTER CARE AGENCY.

A. I JUST ASKED THAT BECAUSE WE ARE ALSO CONSIDERED AN AGENCY OF THE STATE. SO IT'S NOT CLEAR TO ME THAT THIS IS TALKING EXCLUSIVELY ABOUT FOSTER CARE AGENCIES.

Q. OKAY. DO YOU SEE THAT IT SAYS THESE ARE MINIMUM REQUIREMENTS?

A. YES, I DO.

Q. WHAT DO YOU UNDERSTAND THAT TO MEAN?

A. LESS THAN WHAT IS REQUIRED.

Q. OKAY. AND TO THIS DAY, THIS IS A DOCUMENT THAT THE DEPARTMENT OF HUMAN SERVICES IS SENDING POTENTIAL FOSTER PARENTS TO, CORRECT?

MR. FIELD: YOUR HONOR, THIS IS NOT A DEPARTMENT OF HUMAN SERVICES DOCUMENT.

THE COURT: I BELIEVE SHE INDICATED THAT THE RESOURCE, THE PARENT RESOURCE THAT YOU GAVE TO HER FROM THE CITY OF PHILADELPHIA WAS DATED.

MR. RIENZI: I UNDERSTAND THAT, YOUR HONOR. IT APPEARS ON THEIR WEBSITE. AND SO I AM ASKING A QUESTION ABOUT IT BECAUSE THEY ARE STILL REFERRING PEOPLE TO THIS AGENCY. SO I AM SIMPLY TRYING TO FIND OUT --

BY MR. RIENZI:

Q. WELL, LET ME ASK YOU. I WILL ASK A DIFFERENT QUESTION. DO YOU DISAGREE WITH THE LANGUAGE YOU SEE ON PAGE 7 THAT THOSE REQUIREMENTS FOR RESOURCE PARENTS ARE MINIMUMS?

A. I DON'T RUN THIS AGENCY, SO I CAN'T SPEAK -- I CAN'T ANSWER THAT.

Q. THOSE ARE THE REQUIREMENTS FOR CERTIFYING A FOSTER FAMILY, CORRECT?

MR. FIELD: OBJECTION TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: THIS IS NOT HER DOCUMENT.

MR. RIENZI: I KNOW IT'S NOT HER DOCUMENT. IT'S THE DOCUMENT THAT THE CITY SENDS TO FOSTER PARENTS TO LOOK AT.

THE COURT: THIS IS NOT HER DOCUMENT. SO SHE CANNOT TELL YOU WHETHER OR NOT THESE ARE THE MINIMUM -- THESE ARE THE REQUIREMENTS TO CERTIFY.

MR. RIENZI: SO FAIR ENOUGH. I AM ASKING HER IF SHE AGREES WITH THE DOCUMENT. SHE DOESN'T HAVE TO TELL ME WHAT THEY MEANT. DOES SHE AGREE?

BY MR. RIENZI:

Q. DO YOU AGREE, COMMISSIONER FIGUEROA, TO THE STATEMENT IN THE DOCUMENT THAT YOU ARE SENDING FOSTER PARENTS TO?

MR. FIELD: I OBJECT TO THIS IN THAT THE DOCUMENT IS PRINTING PORTIONS OF REGULATIONS AND THE WITNESS HAS ALREADY SAID SHE IS ONLY GENERALLY FAMILIAR WITH THOSE REGULATIONS.

THE COURT: CAN YOU STATE WHETHER OR NOT THESE ARE THE MINIMUM REQUIREMENTS?

THE WITNESS: THESE ARE NOT THE

REGULATIONS IN THEIR ENTIRETY.
BY MR. RIENZI:
Q. AND IT'S YOUR UNDERSTANDING OF THE WAY THE FOSTER CARE SYSTEM WORKS THAT FOSTER CARE AGENCIES ARE ALLOWED TO VARY THEIR POLICIES FOR APPROVAL OF RESOURCE PARENTS, ISN'T IT?
MR. FIELD: OBJECTION TO THE AMBIGUITY IN "AGENCIES" THERE, YOUR HONOR.
THE COURT: YES. SUSTAINED.
BY MR. RIENZI:
Q. IT IS YOUR UNDERSTANDING THAT FOSTER CARE AGENCIES THAT WORK WITH THE CITY OF PHILADELPHIA ARE PERMITTED BY STATE LAW TO VARY THEIR POLICIES FOR APPROVAL OF FOSTER FAMILIES, CORRECT?
MR. FIELD: OBJECTION TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION.
THE COURT: OVERRULED. CAN YOU ANSWER THAT QUESTION?
THE WITNESS: I AM NOT SURE BECAUSE IRREGARDLESS WE HAVE OUR EXISTING CONTRACT THAT IDENTIFIES WHAT THEY ARE REQUIRED TO MEET.
BY MR. RIENZI:
Q. SO IS IT YOUR POSITION THAT FOSTER CARE AGENCIES THAT WORK WITH THE CITY OF PHILADELPHIA ARE NOT ALLOWED TO VARY THEIR REQUIREMENTS FOR BECOMING A FOSTER PARENT?

THE COURT: WHAT DO YOU MEAN BY "VARY THEIR REQUIREMENTS"?

BY MR. RIENZI:

Q. THERE ARE REQUIREMENTS LISTED IN STATE LAW, CORRECT?

A. YES.

Q. AND I APOLOGIZE. YOU ARE AWARE THAT THERE ARE REQUIREMENTS IN STATE LAW FOR BECOMING A FOSTER FAMILY, CORRECT?

A. I AM AWARE, YES.

Q. AND MY QUESTION TO YOU IS, ARE AGENCIES ALLOWED TO VARY AND TO ADD TO THOSE REQUIREMENTS?

A. I BELIEVE I HAVE ANSWERED THAT. THEY ARE REQUIRED TO FOLLOW THE CONTRACT WITH THE CITY OF PHILADELPHIA IRREGARDLESS OF WHAT THIS GUIDE MIGHT STIPULATE.

Q. AS I MATTER OF STATE LAW, IS IT YOUR UNDERSTANDING THAT THEY ARE ALLOWED TO TREAT THESE AS MINIMUM REQUIREMENTS?

MR. FIELD: OBJECTION TO THE LEGAL CONCLUSION.

THE COURT: YES. SUSTAINED. SUSTAINED. I AM NOT QUITE SURE WHERE -- WHAT REQUIREMENTS WE ARE TALKING ABOUT.

BY MR. RIENZI:

Q. NO ONE FROM YOUR AGENCY HAS COME TO YOU TO SAY WE ARE REFERRING PEOPLE TO A MANUAL THAT IS TELLING THEM THE WRONG THING, HAVE THEY?

A. NOT THAT HAS BEEN BROUGHT TO MY LEVEL.

Q. AND NO ONE HAS TOLD THAT YOU THAT THE CITY'S WEBSITE SAYS ANYTHING WRONG ABOUT BEING A FOSTER PARENT EITHER, CORRECT?

A. WE HAVE GOTTEN FEEDBACK THAT THE INFORMATION IS DATED.

Q. WHEN?

A. WE ARE IN THE PROCESS OF REDOING OUR ENTIRE WEBSITE.

Q. WHEN DID YOU GET THAT FEEDBACK?

A. WE HAVE GOTTEN THAT FROM OUR STAFF AND WE HAVE GOTTEN THAT FROM PROVIDERS. AND I CANNOT GIVE YOU AN EXACT DATE, BUT I WILL TELL YOU IN THE COURSE OF THE TWO YEARS I HAVE BEEN A COMMISSIONER, THAT IT'S REGULAR FEEDBACK THAT WE GET REGARDING OUR WEBSITE.

Q. IS ANY OF THAT FEEDBACK RELATED TO THE LANGUAGE ON YOUR WEBSITE THAT SAYS AGENCIES CAN HAVE SLIGHTLY DIFFERENT REQUIREMENTS?

A. I DIDN'T ANSWER THAT QUESTION.

Q. YOU DID OR DID NOT?

A. I DID NOT.

Q. OKAY. I AM ASKING YOU IF ANY OF THE FEEDBACK

YOU HAVE RECEIVED RELATES TO THE SENTENCE ON THE CITY'S WEBSITE THAT SAYS EACH AGENCY HAS SLIGHTLY DIFFERENT REQUIREMENTS.

A. WHAT ARE YOU REFERENCING NOW.

Q. NOW I AM BACK AT THE ORIGINAL WEBSITE THAT WE LOOKED AT. IT SAYS: BIRTH, MARRIAGE AND LIFE EVENTS ON THE FIRST PAGE. AND THEN IT HAS THIS BOX?

A. YES, THANK YOU.

Q. AND YOU SAID YOU HAVE RECEIVED FEEDBACK THAT THE INFORMATION ON YOUR WEBSITE IS DATED. AND I AM SIMPLY TRYING TO FIND OUT WHETHER ANY OF THAT FEEDBACK RELATES TO THE SENTENCE ON THE WEB PAGE THAT SAYS EACH AGENCY HAS SLIGHTLY DIFFERENT REQUIREMENTS, SPECIALTIES, AND TRAINING PROGRAMS.

A. IT HAS BEEN GENERAL FEEDBACK.

Q. NO ONE HAS SPECIFICALLY TOLD YOU THAT THAT SENTENCE ON YOUR WEBSITE WAS WRONG?

A. NOT THAT PARTICULAR SENTENCE.

Q. AND AS YOU SIT HERE TODAY, YOU DON'T HAVE ANY INTENTION OF CHANGING THAT, DO YOU?

A. I'M CERTAINLY GOING TO --

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE COURT: SUSTAINED.

MR. RIENZI: PERMISSION TO APPROACH, YOUR

HONOR.

THE COURT: YES.

BY MR. RIENZI:

Q. HANDING YOU A DOCUMENT LABELED PLAINTIFF'S EXHIBIT 18. AND IT'S THE WEBSITE FROM AN ORGANIZATION CALLED THE SECOND CHANCE.

A. A SECOND CHANCE.

Q. A SECOND CHANCE. ARE YOU FAMILIAR WITH A SECOND CHANCE?

A. I AM.

Q. WHAT ARE THEY?

A. THEY'RE A FOSTER CARE PROVIDER AGENCY AND THEY ALSO DO FAMILY GROUP DECISION-MAKING.

Q. WHAT IS FAMILY GROUP DECISION-MAKING?

A. IT'S BASICALLY A TEAMING PROCESS TO HELP DETERMINATION OF THE PROGRESS ON A CASE.

Q. I WOULD LIKE TO DIRECT YOUR ATTENTION TO THE SECOND SENTENCE IN THE BOX AT THE TOP OF THE PAGE UNDER KINSHIP CARES. AND IT READS: AS THE ONLY AGENCY IN THE COUNTRY THAT EXCLUSIVELY DELIVERS SERVICES TO THE ENTIRE KINSHIP TRIAD, CHILD, CAREGIVER, AND BIRTH PARENTS, ITS APPROACH IS PURE KINSHIP.

DO YOU SEE THAT?

A. I DO.

MR. FIELD: YOUR HONOR, I WOULD OBJECT TO

THE QUESTION BOTH ON RELEVANCE AND HEARSAY. THIS IS NOT A DHS DOCUMENT.

THE COURT: WELL, OVERRULED. I AM NOT QUITE SURE WHERE WE ARE GOING BUT --

MR. RIENZI: I WILL GET THERE QUICKLY, YOUR HONOR.

THE COURT: OKAY.

BY MR. RIENZI:

Q. A SECOND CHANCE SAYS ON ITS WEBSITE THAT IT EXCLUSIVELY DOES KIN CARE, CORRECT?

A. THAT'S THEIR TERMINOLOGY, YES.

Q. DO YOU BELIEVE IT WOULD VIOLATE THE PUBLIC ACCOMMODATIONS LAW FOR SECOND CHANCE TO EXCLUSIVELY DO KINSHIP CARE?

MR. FIELD: OBJECTION, CALLS FOR A LEGAL CONCLUSION.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. HAVE YOU EVER INVESTIGATED A SECOND CHANCE FOR THE FACT THAT IT SAYS IT EXCLUSIVELY DOES KIN CARE?

MR. FIELD: OBJECTION TO THE EXTENT THAT IT ASSUMES DHS INVESTIGATES ON SUCH SUBJECTS.

THE COURT: OVERRULED. SHE CAN ANSWER.

THE WITNESS: CAN YOU REPEAT?

BY MR. RIENZI:

Q. HAVE YOU EVER INVESTIGATED A SECOND CHANCE FOR THE CLAIM ON ITS WEBSITE THAT IT EXCLUSIVELY DOES KIN CARE?

A. NO, BECAUSE THEY SERVE EVERYBODY WE SEND TO THEM.

Q. YOU DIDN'T CUT OFF REFERRALS TO A SECOND CHANCE?

A. THEY ACCEPT EVERYBODY WE SEND TO THEM.

Q. YOU DID NOT CUT OFF REFERRALS TO A SECOND CHANCE?

A. NO.

Q. FOR SECOND CHANCE YOU DECIDED THAT WHAT THEY ACTUALLY DO IS WHAT MATTERS, CORRECT?

THE COURT: SUSTAINED.

MR. FIELD: OBJECTION, YOUR HONOR.

BY MR. RIENZI:

Q. FOR SECOND CHANCE YOU DID NOT THINK THAT YOU SHOULD CUT OFF REFERRALS SIMPLY BASED ON THEIR STATEMENT ON THE WEBSITE, CORRECT?

A. CORRECT. AS A MARKETING DOCUMENT, NOT A DIRECT RESPONSE TO A QUESTION ASKED.

Q. IS IT YOUR TESTIMONY THAT SECOND CHANCE CURRENTLY DOES NONKINSHIP FOSTER CARE?

MR. FIELD: CAN YOU REPEAT THE QUESTION, PLEASE, COUNSEL?

BY MR. RIENZI:

Q. IS IT YOUR TESTIMONY THAT A SECOND CHANCE CURRENTLY DOES NONKINSHIP FOSTER CARE?
A. THAT'S NOT THE WORDS I USE.
Q. IS THAT TRUE?
A. THOSE ARE NOT THE WORDS I USE.
Q. IS -- DOES A SECOND CHANCE CURRENTLY DO NONKINSHIP FOSTER CARE?
A. YES.
Q. WHEN DID YOU FIND THAT OUT?
A. I DON'T HAVE -- I DON'T KNOW THAT I CAN TELL YOU A DATE.
Q. WAS IT WITHIN THE LAST MONTH OR FURTHER AGO THAN THAT?
A. PROBABLY AS LONG AS I HAVE KNOWN SECOND CHANCE.
Q. WHICH IS HOW LONG?
A. IN MY CAPACITY AS COMMISSIONER, TWO YEARS.
Q. WAS THERE A TIME WHEN SECOND CHANCE ONLY DID KINSHIP CARE?
A. I DON'T KNOW.
Q. YOU NEVER DID ANY INVESTIGATION TO FIND THAT OUT?
THE COURT: WELL, SHE NEVER DID ANY INVESTIGATION OF KINSHIP CARE.
BY MR. RIENZI:
Q. TO FIND OUT WHETHER SECOND CHANCE ONLY FOCUSED

ON KINSHIP CARE?

MR. FIELD: IT HAS BEEN ANSWERED, YOUR HONOR.

THE COURT: IT WAS. SUSTAINED.

BY MR. RIENZI:

Q. OTHER THAN YOUR CLAIM THAT IT IS IN THE CONTRACT, IS THE POLICY THAT A FOSTER CARE AGENCY MUST PROVIDE A HOME STUDY TO ANY COUPLE THAT WANTS IT WRITTEN DOWN ANYPLACE ELSE?

MR. FIELD: OBJECTION, YOUR HONOR. THAT IS NOT THE WITNESS'S TESTIMONY REGARDING THE CONTRACT.

THE COURT: OVERRULED.

THE WITNESS: THE CONTRACT -- BY THE NATURE OF A CONTRACT IS YOU'RE BOUND TO THE SERVICES THAT YOU HAVE AGREED TO DO ON BEHALF OF THE CITY OF PHILADELPHIA. IT CLEARLY INDICATES THAT SERVICES INCLUDE TRAINING, RECRUITMENT AND CERTIFICATION OF FOSTER HOME.

BY MR. RIENZI:

Q. AND THE CONTRACT DOES NOT SAY TO DO IT FOR ALL FAMILIES, DOES IT?

A. I THINK WE HAVE ALREADY ANSWERED THAT, THAT IT'S -- IN THIS VERY LONG DOCUMENT I CANNOT SPEAK TO THAT SPECIFIC.

Q. WE WILL LET THE CONTRACT SPEAK FOR ITSELF ON

THAT POINT.

OTHER THAN THE CONTRACT, HAVE YOU EVER SEEN THIS POLICY WRITTEN ANYPLACE ELSE?

A. JUST CLARIFY, WHAT DO YOU MEAN POLICY AS A SPECIFIC POLICY OF WHO?

Q. YOUR CLAIMED POLICY THAT A FOSTER AGENCY MUST PROVIDE THE HOME STUDY FOR ANY PROSPECTIVE FAMILY THAT WANTS IT?

A. ONLY AS IT IS REQUIRED THROUGH THE CONTRACT.

Q. SO NO, YOU HAVE NOT SEEN IT WRITTEN ANYPLACE BUT THE CONTRACT, CORRECT?

A. I DON'T KNOW.

Q. THERE IS NO PLACE THAT YOU CAN NAME FOR ME TODAY THAT THAT IS WRITTEN OTHER THAN THE CONTRACT, CORRECT?

A. I CAN'T ANSWER SO I WOULD HAVE TO SAY I DON'T KNOW.

Q. OKAY. YOU DON'T DOUBT THE SINCERITY OF CATHOLIC'S RELIGIOUS BELIEFS, DO YOU?

A. NO, I DO NOT.

Q. AND I BELIEVE YOU SAID EARLIER YOU DON'T DOUBT THAT THEY ARE IN FACT RELIGIOUS, DO YOU?

A. NO, I DON'T DOUBT THAT AT ALL.

Q. AND YOU UNDERSTAND, I BELIEVE YOU TESTIFIED YESTERDAY, THAT CATHOLIC'S POSITION ABOUT HOME STUDIES IS A RELIGIOUS DECISION, CORRECT?

A. YES, IN THEIR VIEW, YES.
Q. AND YOU TOLD CATHOLIC THAT YOU WOULD NOT MAKE AN EXCEPTION TO ALLOW CATHOLIC TO CHOOSE NOT TO DO CERTAIN HOME STUDIES, CORRECT?
A. MY POSITION WAS THAT IF YOU REMOVE THAT INDIVIDUAL COMMUNITY AND INSERTED AFRICAN AMERICAN OR LATINO, IT WOULD NOT BE EVEN A QUESTION. SO TO ME IT WAS CLEARLY DISCRIMINATORY IN NATURE.
Q. BECAUSE TO YOU IT'S AKIN TO RACISM?
A. IT'S DISCRIMINATING AGAINST A PARTICULAR COMMUNITY.
Q. I BELIEVE YOU SAID BEFORE THAT YOU HAVE NO EVIDENCE THAT ANY ACTUAL GAY COUPLE EVER ASKED CATHOLIC TO PERFORM THE SERVICE, IS THAT CORRECT?
A. COULD YOU REPHRASE THAT.
Q. YOU ARE NOT AWARE OF ANY ACTUAL GAY COUPLE THAT EVER ASKED CATHOLIC TO PERFORM A HOME STUDY, CORRECT?
A. I AM NOT AWARE.
MR. FIELD: YOUR HONOR, I BELIEVE THAT MISCHARACTERIZES THE WITNESS'S TESTIMONY.
THE COURT: NO, I BELIEVE SHE TESTIFIED TO THAT ALREADY.
BY MR. RIENZI:
Q. BUT YOU STILL WON'T MAKE ANY EXCEPTION FOR CATHOLIC?

A. THAT THEY CAN DISCRIMINATE AGAINST ONE PARTICULAR COMMUNITY?

Q. THAT THEY CAN ALLOW THE OTHER 28 OR 29 AGENCIES IN THE CITY TO DO THAT HOME STUDY. YOU WILL NOT ALLOW THEM AN EXCEPTION, CORRECT?

A. I BELIEVE I HAVE ANSWERED THAT. I WOULD NOT ALLOW ONE ORGANIZATION TO DISCRIMINATE IN THE WAY THAT I WOULD NOT ALLOW THE OTHER 28 TO CHOOSE THEN TO DISCRIMINATE AGAINST OTHER COMMUNITIES. IT'S CERTAINLY A VERY DANGEROUS PLACE FOR THE CITY TO ENTER INTO TO ALLOW DISCRIMINATION OF ANY COMMUNITY.

Q. YOU AGREE THAT TRANSFERRING FOSTER KIDS FROM THEIR HOMES IS NOT IN THEIR BEST INTEREST, CORRECT?

A. I DO AGREE WITH THAT.

Q. YOU AGREE IT WOULD BE TRAUMATIC TO TRANSFER KIDS FROM THEIR FOSTER HOMES?

MR. FIELD: OBJECTION, CALLS FOR SPECULATION, YOUR HONOR.

THE COURT: OVERRULED. YOU MAY ANSWER.

THE WITNESS: THAT'S NOT ALWAYS THE CASE. SO IT'S NOT A YES OR NO ANSWER.

BY MR. RIENZI:

Q. YOUR REASON -- STRIKE THAT.

YOU HAVE ALREADY TESTIFIED EARLIER TODAY AND I BELIEVE ON TUESDAY THAT YOU SHUT DOWN INTAKE AT

CATHOLIC TO PROTECT THE BEST INTEREST OF CHILDREN, CORRECT?

A. THAT'S CORRECT.

Q. AND THE REASON -- YOUR REASON FOR DOING THAT WAS THAT YOU DIDN'T WANT TO PLACE CHILDREN AT CATHOLIC WHO MIGHT LATER HAVE TO BE MOVED, CORRECT?

A. THAT IS CORRECT, OR ADD ADDITIONAL CHILDREN THAT WOULD HAVE TO POSSIBLY BE MOVED.

Q. BECAUSE MOVING CHILDREN FROM CATHOLIC COULD BE TRAUMATIC FOR THEM, CORRECT?

A. AS I STATED EARLIER, IT'S NOT A YES OR NO ANSWER.

Q. WELL THEN, I DON'T UNDERSTAND YOUR REASON. I THOUGHT YOUR ARGUMENT WAS I DON'T WANT TO PUT MORE KIDS THERE, RIGHT? YOU SAID YOU DIDN'T WANT TO PUT MORE KIDS AT CATHOLIC, CORRECT?

A. I THINK WHAT I DIDN'T HAVE A CHANCE TO SAY IS THAT EACH CASE IS AN INDIVIDUAL SITUATION. IN GENERALIZATION, MOVING KIDS IS NOT SOMETHING THAT THE CITY WANTS TO HAVE TO DO AS IT RELATES TO A DISRUPTION FOR A CHILD.

Q. AND THE GENERAL REASON FOR THAT GENERAL VIEW THAT YOU DON'T WANT TO MOVE KIDS IS WHAT?

A. IS THAT WE WANT TO MAKE SURE THAT WE MAINTAIN THE BEST INTEREST OF THE CHILD.

Q. AND FOR SOME CHILDREN IT WON'T BE IN THEIR BEST INTEREST TO BE TRANSFERRED FROM HOME TO HOME, CORRECT?

A. WELL, WE HOPE IN THE BEST INTEREST THAT WE ACTUALLY DON'T HAVE TO MOVE HOME TO HOME. WE BELIEVE VERY STRONGLY SINCE 50 PERCENT OF THE CATHOLIC SOCIAL SERVICES ARE WITH KIN, THAT KIN WOULD WANT TO CONTINUE TO TAKE CARE OF THEIR OWN KIN AND THAT THEY WOULD TRANSFER TO ANOTHER AGENCY. THAT'S CERTAINLY THE CONVERSATION WE WOULD HAVE WITH THE OTHER FOSTER PARENTS WHO ARE AMAZING AND ALSO EXPRESSED THAT THEIR GENERAL CARE -- AND EVERYBODY KNOWS THAT FOSTER PARENTS DO THIS BECAUSE THEY LOVE THE CHILDREN, AND THAT WOULD BE A VERY DIFFICULT POSITION TO HAVE TO PUT A FOSTER PARENT, BECAUSE ULTIMATELY IT WILL BE THE FOSTER PARENTS WHO WILL HAVE TO DECIDE WHETHER OR NOT THEY WANT TO MOVE TO ANOTHER FOSTER AGENCY OR IF THEY ARE WILLING TO NO LONGER HAVE A CHILD IN THEIR HOME.

Q. YOU HEARD SOME OF THEM TESTIFY ON MONDAY THAT THEY MAY NOT CHOOSE TO TRANSFER TO ANOTHER AGENCY, CORRECT?

MR. FIELD: OBJECTION, MISCHARACTERIZES PRIOR TESTIMONY.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. WERE YOU IN THE ROOM WHEN THE FOSTER MOTHERS

TESTIFIED ON MONDAY?
A. I WAS.
Q. YOU HEARD THEM SAY THAT THEY DO NOT WANT TO TRANSFER AWAY FROM CATHOLIC, CORRECT?
A. I HEARD THEY WERE NOT SURE.
Q. YOU DIDN'T HEAR THEM SAY THAT THEY DON'T WANT TO DO IT?
A. THEY ALL SAID THAT THEY WERE NOT SURE. THEY COULD NOT STATE AT THIS TIME.
Q. THEY ALL STATED THAT THEY DID NOT WANT TO, CORRECT?
MR. FIELD: ASKED AND ANSWERED, YOUR HONOR.
THE COURT: SUSTAINED.
BY MR. RIENZI:
Q. THEY SAID THEY WERE NOT SURE WHAT THEY WOULD DO IF CATHOLIC WAS SHUT DOWN, BUT YOU AGREE THAT THEY ALL EXPRESSED A PREFERENCE TO REMAIN WITH CATHOLIC, CORRECT?
MR. FIELD: OBJECTION, YOUR HONOR.
THE COURT: SUSTAINED.
BY MR. RIENZI:
Q. YOU SAID THIS MORNING THAT YOUR REASON FOR CLOSING INTAKE WAS TO PROTECT THE BEST INTEREST OF THE CHILDREN, CORRECT?
A. YES, CORRECT.

Q. THAT WAS NOT YOUR EXPLANATION FOR THE FREEZE AT THE TIME YOU INSTITUTED IT, WAS IT?

A. I DON'T UNDERSTAND THE QUESTION.

Q. THAT EXPLANATION AS THE REASON FOR YOUR FREEZE WAS NOT THE REASON YOU GAVE AT THE TIME, WAS IT?

MR. FIELD: OBJECTION, GAVE TO WHOM?

MR. RIENZI: ANYBODY.

THE WITNESS: I DON'T KNOW. THAT'S NOT TRUE. I HAD PLENTY OF CONVERSATIONS INTERNALLY REGARDING THAT MATTER.

BY MR. RIENZI:

Q. WHO DID YOU TELL THAT IT WAS IN THE BEST INTEREST OF THE CHILDREN AND THAT'S WHY YOU WERE DOING THE FREEZE?

A. MY EXECUTIVE TEAM.

Q. AND WHO IS ON THAT TEAM?

A. YOU WANT ME TO NAME ALL OF THEM?

Q. HOW BIG IS IT?

A. IT'S ALL OF THE DEPUTIES AS WELL AS THE OPERATIONAL DIRECTORS. MY TEAM IS ABOUT 15 PEOPLE.

Q. FOR BOTH OF OUR GOOD, I WILL SAY NO THANK YOU.

A. OKAY.

Q. YOU AUTHORIZED COMMISSIONER ALI TO SEND THE E-MAIL TO CUA LEADERSHIP ON MARCH 26 TELLING THEM ABOUT THE SHUTDOWN, CORRECT?

A. I DID.
Q. AND THAT E-MAIL DID NOT TELL CUA LEADERSHIP THAT THE REASON FOR THE SHUTDOWN WAS THE BEST INTEREST OF THE CHILD, CORRECT?
A. WE NEVER PROVIDE FOR THE PURPOSES OF THE PROVIDERS THE REASONS WHY WE ARE CLOSING INTAKE FOR ANY PROVIDER. IT'S NOT FAIR TO THAT PROVIDER TO PUT OUT THEIR PERSONAL BUSINESS IN REGARDS TO WHAT IS HAPPENING TO THEM.
Q. YOU DIDN'T TELL CATHOLIC THAT THE REASON FOR THE SHUTDOWN WAS THE BEST INTEREST OF THE CHILDREN, DID YOU?
A. NO. WE EXPLAINED THAT WE HAD TO INVESTIGATE THIS FURTHER.
Q. AND YOU TOLD THEM THE REASON FOR THE SHUTDOWN WAS THE POSSIBILITY THAT THEY WOULD NOT DO A HOME STUDY FOR SAME-SEX COUPLES, CORRECT?
A. VIOLATION OF THE FAIR PRACTICES ORDINANCE, YES.
Q. DO YOU UNDERSTAND THAT SOME FOSTER MOTHERS AND FOSTER CHILDREN WOULD BE HARMED IF CATHOLIC IS FORMED TO CLOSE -- FORCED TO CLOSE?
THE COURT: WHAT DO YOU MEAN BY "HARMED"?
MR. FIELD: OBJECTION TO SPECULATION, YOUR HONOR.
THE COURT: SUSTAINED.
BY MR. RIENZI:

Q. DID YOU HEAR MS. SIMMS-BUSCH TESTIFY ABOUT HOW HER CHILDREN WOULD LOSE THE SOCIAL WORKER THEY HAVE BONDED WITH IF CATHOLIC IS FORCED TO CHOSE?

MR. FIELD: OBJECTION, YOUR HONOR, MISCHARACTERIZES THE WITNESS'S TESTIMONY. SHE REPRESENTED SHE WOULD NOT -- SHE DID NOT KNOW WHAT SHE WOULD DO IF CATHOLIC WAS FORCED TO CLOSE.

BY MR. RIENZI:

Q. DID YOU HEAR MS. SIMMS-BUSCH TESTIFY THAT HER CHILDREN WOULD LOSE THE SOCIAL WORKER WHO HAS A BOND WITH HER KIDS IF CATHOLIC IS FORCED TO CLOSE? DID YOU HEAR THAT?

THE COURT: OVERRULED. YOU MAY ANSWER.

THE WITNESS: JUST TO CLARIFY, YOU'RE TALKING ABOUT THE SOCIAL WORKER VERSUS THE FOSTER PARENT?

BY MR. RIENZI:

Q. YES. FOR THAT QUESTION I AM TALKING ABOUT THE SOCIAL WORKER WHO MS. SIMMS-BUSCH TESTIFIED ABOUT, THE CATHOLIC SOCIAL WORKER.

A. SO COULD YOU REPEAT? I JUST WANTED TO CLARIFY YOU WERE TALKING ABOUT THE SOCIAL WORKER.

Q. SURE. YOU HEARD MS. SIMMS-BUSCH TESTIFY THAT HER CHILDREN WOULD LOSE THE CATHOLIC SOCIAL WORKER WHO HAS A BOND WITH THEM IF CATHOLIC IS FORCED TO CLOSE?

A. I DID HEAR THAT, YES.
Q. YOU HEAR MS. PAUL TESTIFY ABOUT HOW SHE WOULD LOSE THE ABILITY TO RELY ON THE SOCIAL WORKERS SHE HAS TRUSTED FOR DECADES, CORRECT?
A. THAT IS CORRECT.
Q. YOU HEARD MS. PAUL TESTIFY ABOUT HOW HER HOME IS AVAILABLE RIGHT NOW, CORRECT?
A. I DID HEAR THAT, YES.
Q. AND YOU HEARD MS. FULTON TESTIFY ABOUT HER -- HOW HER CHILDREN MAY BE TRANSFERRED AWAY FROM HER IF CATHOLIC CLOSES, CORRECT?
A. ONLY IF SHE CHOOSES TO NOT TRANSFER TO ANOTHER AGENCY.
Q. WHICH SHE SAID SHE MIGHT CHOOSE TO DO, CORRECT?
A. AND SHE SAID SHE WAS NOT SURE.
Q. BUT YOU HEARD HER TESTIFY ABOUT HOW HER CHILDREN MIGHT BE TRANSFERRED AWAY FROM HER IF CATHOLIC CLOSES, CORRECT?
A. I HEARD THAT THEY MIGHT.
Q. AND YOU HEARD HOW DHS IN THE PAST HAS BEEN UNABLE TO FIND A HOME FOR ONE OF THOSE CHILDREN, CORRECT?
A. NO.
Q. YOU DIDN'T HEAR THAT?
A. I DON'T RECALL THAT.

Q. OKAY.

A. I MEAN, IF YOU HAVE IT AND YOU WOULD LIKE ME TO SEE THE TRANSCRIPT.

Q. THAT'S FINE.

AT A MINIMUM, ALL OF THESE FOSTER MOTHERS WOULD BE FORCED TO GO TO AN AGENCY THAT IS NOT THEIR FIRST CHOICE IF CATHOLIC IS CLOSED, CORRECT?

A. THAT IS CORRECT.

Q. DON'T THESE WOMEN HAVE A RIGHT TO BE AT THE FOSTER AGENCY THAT IS THEIR FIRST CHOICE?

A. THEY HAVE THE RIGHT TO BE AT THE FOSTER CARE AGENCY THEY CHOOSE.

Q. BUT IF THE CITY FORCES CATHOLIC TO SHUT DOWN, THESE WOMEN WILL NOT BE ALLOWED TO BE AT THE AGENCY THAT THEY TESTIFIED IS THEIR FIRST CHOICE, CORRECT?

A. IF CATHOLIC CHOOSES NOT TO ENTER INTO A FULL CONTRACT, THEN YES, THEY'RE GOING TO HAVE TO FIND NEW HOMES.

Q. AND TO YOUR KNOWLEDGE, THE ONLY REASON THAT CATHOLIC WOULD REFUSE TO DO THAT IS BECAUSE THE CITY IS INSISTING ON ITS POLICY ABOUT DOING HOME STUDIES FOR ANYONE WHO ASKS, CORRECT?

A. THE CITY IS INSISTING THAT CATHOLIC SOCIAL SERVICES COMPLY WITH THEIR CONTRACT.

Q. AND THE ONLY PIECE OF YOUR VIEW OF THE CONTRACT

THAT YOU UNDERSTAND TO BE ANY PROBLEM FOR CATHOLIC IS YOUR INSISTENCE THAT CATHOLIC MUST PROVIDE A HOME STUDY FOR ANY COUPLE WHO ASKS, CORRECT?

A. CAN YOU CLARIFY MY INSISTENCE?

Q. SURE. SO WHAT I AM TRYING TO GET AT IS THERE IS A DISPUTE BETWEEN YOU AND CATHOLIC ABOUT WHAT THE CONTRACT MEANS, RIGHT?

A. I THINK THERE'S A DISPUTE THAT IS BEYOND JUST ME AS AN INDIVIDUAL PERSON.

Q. JUST TO BE CLEAR, BETWEEN DHS AND CATHOLIC. I DON'T AT ALL MEAN TO PERSONALIZE IT AND SAY IT'S JUST YOU. OTHER THAN THE ISSUE OF DOING HOME STUDIES FOR EVERY SINGLE COUPLE WHO ASKS, YOU ARE NOT AWARE OF ANY OTHER REASON THAT CATHOLIC WOULD NOT ENTER INTO A NEW CONTRACT WITH YOU, ARE YOU?

MR. FIELD: OBJECTION, YOUR HONOR. HE IS ASKING ABOUT CATHOLIC'S REASONS FOR DOING SOMETHING, WHICH THE COMMISSIONER WOULD NOT KNOW.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. HAS CATHOLIC STATED ANY REASON TO YOU THAT IT WOULD BE UNABLE TO ENTER INTO A NEW CONTRACT OTHER THAN DHS'S INSISTENCE THAT IT MUST DO HOME STUDIES FOR EVERYONE WHO ASKS?

A. THEY HAVE INDICATED THEY WOULD NOT COMPLY

BECAUSE THEY WOULD NOT CERTIFY SAME-SEX COUPLES, WHICH IS A PORTION OF THE SERVICE THAT IS REQUIRED TO DELIVER.

Q. I UNDERSTAND THAT'S YOUR UNDERSTANDING OF THE CONTRACT. AND I AM ASKING, HAS CATHOLIC TOLD YOU THERE IS ANYTHING ELSE THAT WOULD STOP THEM FROM ENTERING INTO A NEW CONTRACT?

A. OTHER THAN COMPLYING? NO.

Q. OTHER THAN THAT ONE ISSUE?

A. OTHER THAN COMPLYING, NO.

Q. NO. I WANT -- I DON'T WANT THE BROAD WORD "COMPLY." I AM ASKING YOU A SPECIFIC QUESTION. HAVE THEY --

A. WELL, IF YOU CAN'T DELIVER AN ELEMENT OF YOUR CONTRACT THEN --

Q. I UNDERSTAND YOUR ARGUMENT. I AM ASKING YOU -- YOU HAVE IDENTIFIED ONE SPECIFIC PROBLEM CATHOLIC HAS, THE HOME STUDIES FOR SAME-SEX COUPLES?

A. IT'S A PRETTY BIG PROBLEM.

Q. I AM ASKING YOU TO TELL ME IF THERE ARE ANY OTHER PROBLEMS THAT CATHOLIC HAS STATED THAT WOULD STOP THEM FROM ENTERING INTO THE CONTRACT WITH YOU?

MR. FIELD: YOUR HONOR, HE IS ASKING ABOUT WHETHER OR NOT THINGS WOULD STOP CATHOLIC FROM ENTERING INTO A CONTRACT.

MR. RIENZI: YOUR HONOR, I AM ASKING

ABOUT NEGOTIATIONS THAT THEY HAVE HAD, AND I SIMPLY WANT TO NARROW THE FIELD AND BE CLEAR. I THINK HER TESTIMONY IS THAT THE ONLY ISSUE THAT CATHOLIC HAS RAISED IS THIS ONE ISSUE. AND I WOULD JUST LIKE CONFIRMATION THAT IT IS NOT ANYTHING ELSE, THAT -- IT'S A REASONABLE QUESTION ABOUT DISCUSSIONS SHE HAS HAD.

THE COURT: OVERRULED.

THE WITNESS: THAT WAS UP UNTIL YESTERDAY. THERE HAS BEEN TESTIMONY PROVIDED THAT WAS NEW INFORMATION TO US THAT HAS CERTAINLY CAUSED SOME CONCERN.

BY MR. RIENZI:

Q. I AM ASKING YOU ABOUT CATHOLIC'S NEGOTIATIONS WITH YOU. HAS CATHOLIC TOLD YOU THERE IS ANYTHING ELSE THAT WOULD STOP THEM FROM ENTERING INTO THAT CONTRACT OTHER THAN --

A. AND I AM ANSWERING YES, BECAUSE YESTERDAY THEY INDICATED A NEW REQUIREMENT THAT THEY HAVE WITH A FOSTER PARENT THAT WE WERE COMPLETELY UNAWARE OF UNTIL IT WAS PROVIDED IN TESTIMONY BY JAMES AMATO YESTERDAY.

Q. YOU WERE UNAWARE THAT CATHOLIC -- STRIKE THAT.

MR. RIENZI: PERMISSION TO APPROACH, YOUR HONOR.

THE COURT: YES.

BY MR. RIENZI:

Q. I AM GOING TO HAND YOU A DOCUMENT LABELED EXHIBIT 2, WHICH IS -- IT WAS AN ATTACHMENT TO A BRIEF THE CITY FILED, WHICH IS A COPY OF YOUR DECLARATION. I JUST ASK YOU TO LOOK AT THAT AND TELL ME IF YOU HAVE SEEN IT BEFORE.

A. I HAVE.

Q. AND THAT'S YOUR DECLARATION?

A. IT IS.

Q. AND YOU SIGNED IT?

A. I DID.

Q. CAN YOU TURN TO PAGE 6, PLEASE. IN PARAGRAPH 28 YOU SAY THAT YOU DECIDED TO SUSPEND REFERRALS AND YOU SAY: I DID THIS BECAUSE CSS TOLD US IT COULD NOT COMPLY WITH ITS CONTRACT. DO YOU SEE THAT?

A. I DO.

Q. CSS NEVER USED THE WORDS "COULD NOT COMPLY WITH ITS CONTRACT," DID IT?

A. THIS IS MY DECLARATION, SO MY INTERPRETATION OF --

Q. THAT'S WHAT I WANTED TO BE CLEAR ON. WHEN YOU SAY COULD NOT COMPLY WITH ITS CONTRACT, THAT'S YOUR INTERPRETATION, CORRECT?

A. THAT IN CONSULTATION WITH OUR LEGAL COUNSEL.

Q. THAT'S FINE. BUT YOU ARE NOT TELLING THE COURT THAT CSS SAID IT CAN'T COMPLY WITH ITS CONTRACT,

CORRECT?

A. WELL, THEY SAID THEY WON'T DELIVER A SERVICE, SO IF YOU CAN'T DELIVER PART OF YOUR CONTRACT, I DON'T KNOW HOW ELSE TO DEFINE THAT.

MR. FIELD: YOUR HONOR, I OBJECT TO THIS LINE OF QUESTIONING. THIS AFFIDAVIT PARAGRAPH DOES NOT CONTRADICT ANY OF HER PRIOR TESTIMONY.

MR. RIENZI: YOUR HONOR, I AM NOT ASKING HER IF IT DOES. I AM SIMPLY TRYING TO FIGURE OUT WHAT SHE MEANT AND GET CLARITY THAT WHEN SHE SAID CSS TOLD US IT COULD NOT COMPLY WITH ITS CONTRACT, THAT IN FACT THAT'S AN INTERPRETATION. THAT IS NOT WHAT CSS ACTUALLY SAID.

THE COURT: IT'S NOT THE WORDS THAT THEY USED.

MR. RIENZI: YES. THAT'S WHAT I AM JUST TRYING TO GET CLARITY ON.

MR. FIELD: IT WAS ASKED AND ANSWERED, YOUR HONOR.

THE COURT: I THINK SHE HAS ANSWERED.

MR. RIENZI: YES.

BY MR. RIENZI:

Q. RIGHT NOW, INTAKES ARE FROZEN?

MR. FIELD: OBJECTION TO THE CHARACTERIZATION OF "FROZEN."

BY MR. RIENZI:

Q. I'M SORRY. WHAT IS THE RIGHT PHRASE?

A. INTAKE IS CLOSED.

Q. INTAKE IS CLOSED RIGHT NOW, CORRECT?

A. THAT'S CORRECT.

Q. WHICH IS EASIER FOR THE CENTRAL REFERRAL UNIT, MAKING A PLACEMENT TO ONE OF CATHOLIC'S HOMES WHEN INTAKE IS CLOSED OR WHEN INTAKE IS NOT CLOSED?

A. IT HAS NOT HAD AN IMPACT.

Q. I'M SORRY?

A. IT HAS NOT HAD AN IMPACT.

Q. ARE YOU SURE OF THAT? IT HAS HAD NO IMPACT?

A. IT HAS NOT IMPACTED OUR CONGREGATE CARE OR THE USE OF OUR CHILD CARE ROOM. SO YES, I AM SURE OF THAT.

Q. HOW DO YOU KNOW THAT?

A. WELL, AVAILABILITY OF -- WELL, I KNOW THAT THROUGH DATA.

Q. HOW DO YOU KNOW THAT? WHAT DATA TELLS YOU THAT?

A. I LOOK AT WEEKLY DATA.

Q. AND THAT WEEKLY DATA TELLS THAT YOU THE CLOSURE OF INTAKE HAS HAD NO EFFECT ON CONGREGATE CARE?

A. THAT'S CORRECT.

Q. WHAT DO YOU LOOK AT IN THE DATA TO KNOW THAT?

A. LOOK AT THE NUMBER OF YOUTH THAT ARE IN CONGREGATE CARE AND WHERE THEY ARE LOCATED.

Q. HOW DO YOU KNOW THAT THERE HAS BEEN NO IMPACT FROM THE CLOSURE OF INTAKE?

A. BECAUSE THE NUMBER HAS REMAINED THE SAME OR REDUCED.

Q. THERE'S A LOT OF VARIABLES THAT GO INTO THAT NUMBER, AREN'T THERE?

A. YES. AND I HAVE A PRETTY AMAZING PERFORMANCE AND TECHNOLOGY TEAM THAT ACTUALLY HAVE REALLY GREAT DETAILED DATA ON THIS.

Q. TERRIFIC. HOW MANY KIDS ARE IN CONGREGATE CARE RIGHT NOW?

A. I DON'T WANT TO -- SO WE HAVE DEPENDENT AND DELINQUENT. AND SO WE ARE TALKING ABOUT JUST DEPENDENCY. WE HAVE SOMEWHERE AROUND 715, 17.

Q. OKAY. AND ABOUT HOW MANY OF THOSE IN CONGREGATE CARE COULD BE LIVING WITH FOSTER FAMILIES?

A. I COULD NOT SAY BECAUSE NOT ALL CHILDREN THAT ARE IN CONGREGATE CARE ARE APPROPRIATE FOR FOSTER CARE PLACEMENT.

Q. BUT SOME OF THEM ARE, CORRECT?

A. IT COULD BE.

Q. YOU'VE STATED PUBLICLY THAT ABOUT 250 OF THEM COULD BE IN FAMILY HOMES, HAVEN'T YOU?

A. I STATED THAT WE WOULD WANT TO WORK TO INCREASE THE AMOUNT.

MR. RIENZI: PERMISSION TO APPROACH, YOUR HONOR.

THE COURT: YES.

BY MR. RIENZI:

Q. I AM HANDING THE WITNESS A DOCUMENT LABELED EXHIBIT 19.

MS. FIGUEROA, I WOULD ASK YOU IF YOU ARE FAMILIAR WITH THAT DOCUMENT.

A. I AM FAMILIAR WITH THAT DOCUMENT.

Q. YOU READ IT AROUND THE TIME IT CAME OUT?

A. I AM SURE I READ IT CLOSELY.

Q. WHAT IS IT?

A. IT'S A STORY IN REGARD TO OUR FOSTER CARE RECRUITMENT EFFORT, WHICH I BELIEVE INITIATED THIS WHOLE PROCESS.

MR. FIELD: YOUR HONOR, I JUST OBJECT TO THIS EXHIBIT. IT'S A NEWSPAPER ARTICLE. IT'S NOT AUTHORED BY THE DOCUMENT AND PUBLISHED BY -- LOOKS LIKE PHILLY.COM.

MR. RIENZI: YOUR HONOR, NEWSPAPER ARTICLES ARE SELF-AUTHENTICATING UNDER RULE 902. AND I AM SIMPLY LOOKING TO ASK THE WITNESS A QUESTION ABOUT A QUOTE THAT SHE GAVE IN THE ARTICLE.

MR. FIELD: THE QUOTES FROM THE ARTICLE WOULD STILL BE HEARSAY, YOUR HONOR.

THE COURT: OVERRULED.

BY MR. RIENZI:

Q. MS. FIGUEROA, IF YOU WOULD TURN TO PAGE 3 OF THAT PRINTOUT. DO YOU SEE A BOX AROUND SOME LANGUAGE IN THE ARTICLE?

A. MM-HMM.

Q. CAN YOU READ THAT LANGUAGE ALOUD, PLEASE?

MR. FIELD: COUNSEL, CAN I JUST ASK WHETHER THE BOX IS IN THE ORIGINAL PUBLICATION.

MR. RIENZI: THE BOX IS SOMETHING I PUT TO INDICATE --

MR. FIELD: THANK YOU. SORRY ABOUT THAT.

MR. RIENZI: I PUT THE BOX ON IT TO INDICATE THE LANGUAGE I WANTED TO DIRECT THE WITNESS TO. THE BOX IS ESSENTIALLY -- CONSIDER IT HIGHLIGHTING, PLEASE.

MR. FIELD: SO THIS IS NOT THE ORIGINAL ARTICLE.

THE COURT: TO THE EXTENT HE PLACED THE BOX AROUND --

MR. RIENZI: THE BOX WAS PLACED ON THE ORIGINAL ARTICLE.

THE COURT: -- THE SENTENCE.

BY MR. RIENZI:

Q. COMMISSIONER FIGUEROA, CAN YOU READ THE LANGUAGE

IN THE BOX.

A. IN PHILADELPHIA ABOUT 700 CHILDREN ARE IN GROUP HOME PLACEMENTS. OF THOSE FIGUEROA SAID ABOUT 250 COULD BE LIVING WITH FAMILIES WHILE 450 MORE NEED TO STAY IN STAFFED FACILITIES DUE TO PHYSICAL OR EMOTIONAL NEEDS.

Q. DO YOU RECALL TALKING TO THAT REPORTER?

A. I DO.

Q. AND YOU DIDN'T HAVE ANY REASON TO BE UNTRUTHFUL TO THAT REPORTER, DID YOU?

A. NO.

Q. IS THAT AN ACCURATE DISCUSSION -- DESCRIPTION OF WHAT YOU SAID TO THE REPORTER?

A. CORRECT, YEAH.

Q. SO YOU WOULD SAY THAT OF THE APPROXIMATELY 700 CHILDREN IN GROUP HOMES APPROXIMATELY 250 COULD BE LIVING WITH FAMILIES, CORRECT?

A. I THINK THAT THE OPERATIVE IS "COULD," AS IT REQUIRES A COURT PROCESS.

Q. I BELIEVE YOU SAID YOU HAVE DONE SOME RECRUITING RECENTLY, IS THAT RIGHT?

A. YES, WE HAVE.

Q. AND YOU'VE GOT ABOUT 75 NEW FAMILIES SIGN UP?

A. ACTUALLY, I JUST RAN THE DATA AND IT'S WELL OVER 200.

Q. TERRIFIC. AND ARE SOME OF THOSE FAMILIES

ALREADY TAKING CARE OF KIDS?

A. NO.

Q. WHY NOT?

A. BECAUSE THEY ARE NEW RECRUITS, THEY'VE JUST BEEN NEWLY CERTIFIED.

Q. SO NONE OF THOSE FAMILIES ARE TAKING CARE OF KIDS, CORRECT?

A. I DON'T KNOW EXACTLY RIGHT NOW THAT NUMBER, BUT THOSE ARE -- AS OF TODAY WE HAD WELL OVER 200 NEW RECRUITED FAMILIES.

Q. TERRIFIC. BUT THEY ARE NEW. AND SO IT TAKES A LITTLE WHILE BEFORE THEY CAN START TAKING CARE OF KIDS?

A. NO. ONCE THEY ARE CERTIFIED AND THEY'VE COMPLETED THE PROCESS AND HAVE BEEN LICENSED, THEY ARE PREPARED TO TAKE HOME.

Q. DO YOU KNOW HOW MANY OF THEM HAVE BEEN LICENSED?

A. I DON'T KNOW. I CAN'T ANSWER THAT RIGHT NOW, AND I WOULD HIGHLIGHT THOUGH, AVAILABILITY DOES NOT NECESSARILY MEAN APPROPRIATE PLACEMENT.

Q. HOW MANY OF THOSE 250 KIDS HAVE MOVED OUT OF CONGREGATE CARE?

A. I DON'T UNDERSTAND YOUR QUESTION.

Q. YOU SAID YOU TOLD THE REPORTER THAT ABOUT 250 COULD BE LIVING WITH FAMILIES, CORRECT?

A. THAT IS CORRECT.

Q. I AM ASKING HOW MANY OF THEM ARE STILL IN CONGREGATE CARE?

A. I ALSO EXPLAINED THAT IT'S A COURT PROCESS.

Q. I HEARD THAT PART. I'M ASKING HOW MANY ARE STILL LIVING IN CONGREGATE CARE?

A. I SAID I DON'T HAVE THE EXACT NUMBER OFF THE TOP OF MY HEAD TODAY.

Q. DO YOU HAVE A ROUGH NUMBER?

A. I BELIEVE I GAVE IT TO YOU.

Q. WHAT IS THE NUMBER YOU GAVE?

A. I SAID SOMEWHERE AROUND 700, 715.

Q. THAT'S THE SAME NUMBER ACTUALLY THAT YOU TOLD THE JOURNALIST IN MARCH, ISN'T IT?

A. THAT IS CORRECT.

Q. SO THE NUMBER HAS NOT CHANGED?

A. THE NUMBERS HAVE NOT CHANGED.

Q. AND YOU ARE AWARE THAT THERE ARE AT LEAST A COUPLE OF DOZEN PLACES AVAILABLE WITH FAMILIES THROUGH CATHOLIC SOCIAL SERVICES RIGHT NOW?

A. ACCORDING TO THEIR TESTIMONY, YES.

Q. DO YOU HAVE ANY REASON TO THINK THAT NUMBER IS WRONG?

A. I MEAN, I HAVE NOT VERIFIED THE NUMBERS, SO I WOULD HOPE THAT WHAT THEY ARE SAYING IS ACCURATE.

Q. SO IF INTAKE WAS NOT CLOSED, SOME OF THOSE 250

KIDS COULD HAVE BEEN PLACED AT CATHOLIC, CORRECT?

MR. FIELD: OBJECTION, CALLS FOR SPECULATION, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. THE REASON YOU RECRUITED MORE FOSTER FAMILIES IS THAT YOU WANTED TO REDUCE THE NUMBER OF KIDS IN CONGREGATE CARE, CORRECT?

A. I STATED THAT TO REDUCE THE OLDER POPULATION OF -- OLDER YOUTH POPULATION AS WELL AS YOUTH WHO IDENTIFY AS LGBTQ WHO WANTED TO BE IN AFFIRMING HOMES. SO WE WERE TARGETING PARTICULAR AREAS.

Q. ONE OF THE PARTICULAR AREAS YOU TARGETED IS REDUCING THE NUMBER OF KIDS IN CONGREGATE HOMES, ISN'T IT?

A. THAT'S OLDER YOUTH, YES.

Q. I JUST WANT A CLEAR ANSWER IF I CAN.

THE COURT: SHE SAID YES.

MR. RIENZI: YES. OKAY. THANK YOU.

BY MR. RIENZI:

Q. BUT THE NUMBER OF KIDS IN CONGREGATE CARE ACTUALLY HAS NOT CHANGED SINCE MARCH, CORRECT?

A. I WOULD JUST HIGHLIGHT THAT WE RUN A VERY COMPLICATED SYSTEM, AND SO IT'S NOT WIDGETS. IT'S NOT ONE FOR ONE. KIDS ARE ABUSED EVERY DAY. THEY ARE

NEGLECTED EVERY DAY. THEY END UP IN OUR PLACEMENT, IN OUR CARE, BECAUSE THEIR FAMILIES CAN'T CARE FOR THEM. WE ARE INCREDIBLY FORTUNATE THAT WE HAVE FOSTER CARE AGENCIES, BUT IT'S NOT A ONE TO ONE. SO TO ASSUME THAT BECAUSE THERE IS AVAILABILITY WILL REDUCE THE CONGREGATE CARE IS AN OVEREXAGGERATION OF THE COMPLICATION OF OUR WORK.

Q. I UNDERSTAND THAT IT'S COMPLICATED, AND I VERY MUCH UNDERSTAND THAT THOSE KIDS HAVE BEEN ABUSED AND BEEN THROUGH TERRIBLE TIMES. I AM TRYING TO GET CLARITY ON YOUR PREVIOUS STATEMENTS THAT YOU WANT TO REDUCE THE NUMBER OF KIDS IN CONGREGATE CARE, YOUR PREVIOUS STATEMENT THAT 250 COULD BE LIVING WITH FAMILIES, AND YOUR STATEMENT THAT THERE IS NO IMPACT AT ALL FROM NOT SENDING ANY KIDS TO THE, SAY, 25 OR SO FAMILIES THAT ARE AVAILABLE IN CATHOLIC SOCIAL SERVICES. CAN YOU EXPLAIN TO ME HOW WE CAN CONNECT THOSE DOTS AND MAKE IT MAKE SENSE?

A. THE ONLY DOT I COULD CONNECT IS THAT IF WE COME BACK HERE IN THREE MONTHS I'M HOPING THAT ALL THESE CERTIFIED HOMES, THAT WE WILL GREATLY REDUCE THAT NUMBER. BUT THE NUMBERS THAT I AM PRESENTING ARE THE NUMBERS THAT THE SYSTEM IS DEALING WITH TODAY.

Q. AND THOSE NUMBERS AGAIN ARE THE SAME AS THEY WERE IN MARCH?

A. THEY HAVE NOT INCREASED SINCE THE CLOSURE. SO OUR NEED FOR CATHOLIC SOCIAL SERVICES AVAILABILITY CERTAINLY HAS NOT IMPACTED THE CONGREGATE CARE NUMBER.

Q. THERE ARE REAL KIDS WHO COULD BE IN THOSE HOMES RIGHT NOW, AREN'T THERE?

A. I CAN'T SAY THAT WITHOUT A JUDICIAL DECISION.

Q. YOU CAN'T SAY EITHER WAY WHETHER THERE ARE REAL KIDS WHO ARE IN CONGREGATE HOMES WHO COULD BE AT CATHOLIC RIGHT NOW?

MR. FIELD: CALLS FOR SPECULATION, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. THE REASON FOR YOUR DRIVE WAS TO GET FAMILIES WHO COULD TAKE KIDS, SOME OF WHOM ARE IN CONGREGATE CARE, CORRECT?

MR. FIELD: ASKED AND ANSWERED, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. YOU DON'T KNOW EITHER WAY WHETHER THE AVAILABILITY OF THOSE BEDS IN HOMES WITH CATHOLIC WOULD HELP CHILDREN?

MR. FIELD: CALLS FOR SPECULATION, YOUR HONOR.

THE COURT: SUSTAINED.

MR. RIENZI: YOUR HONOR, THE ENTIRE CASE IS ABOUT HER PREDICTION OF THE BEST INTERESTS OF CHILDREN.

MR. FIELD: MISCHARACTERIZES THE ENTIRE CASE, YOUR HONOR.

THE COURT: SUSTAINED. SUSTAINED.

BY MR. RIENZI:

Q. WHEN THERE ARE NOT ENOUGH FOSTER HOME FOR KIDS, CHILDREN SUFFER?

MR. FIELD: OBJECTION, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. TOO FEW FOSTER HOMES CAN RESULT IN CHILDREN BEING MOVED AROUND?

MR. FIELD: CAN YOU REPEAT THE QUESTION, COUNSELOR?

BY MR. RIENZI:

Q. TOO FEW FOSTER HOMES CAN RESULT IN CHILDREN BEING MOVED AROUND?

MR. FIELD: CALLS FOR SPECULATION, YOUR HONOR.

THE COURT: SUSTAINED.

MR. RIENZI: YOUR HONOR, SHE RUNS THIS SYSTEM, AND I AM TRYING TO FIGURE OUT THE RELATIONSHIP

BETWEEN THE NUMBER OF HOMES AND THE IMPACT ON CHILDREN. I AM SIMPLY TRYING TO GET HER TO TELL ME WHAT THE IMPACT IS OF TOO FEW FOSTER HOMES. I WILL TRY AGAIN.

BY MR. RIENZI:

Q. DO YOU KNOW ANYTHING ABOUT THE IMPACT OF NOT HAVING ENOUGH FOSTER HOMES?

A. NO. I MEAN, I DON'T UNDERSTAND THE QUESTION.

Q. YOU DON'T UNDERSTAND ANYTHING ABOUT THE RELATIONSHIP BETWEEN THE NUMBER OF FOSTER HOMES AVAILABLE AND THE WELL-BEING OF THE CHILDREN IN YOUR CARE? YOU DON'T KNOW ABOUT A RELATIONSHIP BETWEEN THOSE TWO THINGS?

THE COURT: THAT WASN'T YOUR QUESTION.

BY MR. RIENZI:

Q. DO YOU KNOW ANYTHING ABOUT THE RELATIONSHIP BETWEEN THE NUMBER OF FOSTER HOMES AND THE WELL-BEING OF THE CHILDREN IN YOUR CARE?

A. YES.

Q. AND WHAT IS THAT RELATIONSHIP?

A. THAT WE WOULD LIKE TO HAVE HOMES AVAILABLE FOR CHILDREN WHO ARE IN OUR CARE.

Q. MORE FOSTER HOMES IS BETTER FOR THE KIDS IN YOUR CARE, CORRECT?

A. MORE APPROPRIATE FOSTER HOMES ARE AVAILABLE FOR KIDS IN OUR CARE THAT IS IN OUR BEST INTEREST, YES.

Q. AND YOU DON'T HAVE ANY REASON TO THINK THAT THE HOMES CERTIFIED THROUGH CATHOLIC ARE INAPPROPRIATE, DO YOU?

A. NO.

Q. BETWEEN 2016 AND 2017 THE STATE ACTUALLY PUT DHS ON A PROVISIONAL LICENSE, DIDN'T IT?

A. IT WAS PRIOR TO MY ARRIVAL. SO WE -- I BELIEVE JUNE OF 2017, I AM NOT SURE OF THE EXACT DATE, SO IT WAS UNDER A -- WITHIN LESS THAN A YEAR OF MY TENURE THAT WE RECEIVED A FULL LICENSE.

Q. SO WHEN YOU CAME IN, THAT WAS SOMETHING THAT NEEDED YOUR ATTENTION, WASN'T IT?

A. YES. I ACTUALLY TOOK THE JOB HAVING WORKED IN A NONPROFIT PREDOMINANTLY BECAUSE I FELT I COULD MAKE A SIGNIFICANT DIFFERENCE, AND THE AGENCY WAS GOING THROUGH A DIFFICULT TIME.

Q. AND ONE OF THE REASONS IT WAS ON A PROVISIONAL LICENSE WAS THAT THE STATE FOUND MULTIPLE FAILURES TO APPLY WITH APPLICABLE STATE REGULATIONS, CORRECT?

MR. FIELD: OBJECTION, YOUR HONOR. THE WITNESS SAID SHE WAS NOT WITH THE AGENCY AT THAT TIME.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. PART OF THE REASON YOU TOOK THE JOB WAS TO FIX THIS PROBLEM, WASN'T IT, MS. FIGUEROA?

A. IT WAS.

Q. SO ARE YOU FAMILIAR WITH THE SCOPE OF THE PROBLEM THAT LED TO THE PROVISIONAL LICENSE?

A. I AM FAMILIAR WITH THE ISSUES THAT THE STATE PRESENTED, YES.

Q. AND ONE OF THOSE ISSUES WAS THE STATE SAYING THAT THERE WERE MULTIPLE FAILURES TO COMPLY WITH APPLICABLE STATE REGULATIONS, CORRECT?

A. I BELIEVE THAT MISCHARACTERIZES THE LICENSING PROCESS.

Q. THE STATE TOLD YOU WHEN IT GAVE YOU A PROVISIONAL LICENSE THAT DHS HAD FAILED TO COMPLY WITH STATE REGULATIONS, DIDN'T IT?

A. IT CITES SPECIFIC REGULATIONS, YES.

Q. AND ONE OF THE FAILURES WAS ALLOWING CHILDREN TO SLEEP OVERNIGHT TOO LONG IN THE DHS FACILITY WITHOUT ADEQUATE AND TIMELY PLACEMENT, CORRECT?

A. THAT IS CORRECT.

Q. HAVING MORE FOSTER HOMES WOULD HELP YOU DEAL WITH THAT PROBLEM, WOULDN'T IT?

A. WE GOT OUR LICENSE BACK BECAUSE WE REDUCED THE UTILIZATION OF THE CHILD CARE ROOM.

Q. YOU STILL USE IT SOMETIMES THOUGH, HUH?

A. IN THE EVENT OF AN EMERGENCY WHEN A CHILD ARRIVES AT 2 O'CLOCK IN THE MORNING.

Q. YOU ALSO USE IT SOMETIMES WHEN A CHILD DOESN'T ARRIVE IN THE MIDDLE OF THE NIGHT, DON'T YOU?

A. WE -- THE UNFORTUNATE TIMES IS THERE IS A TREMENDOUS COMPLEXITY. THERE'S USUALLY A LOT OF INTELLECTUAL DISABILITY OR SIGNIFICANT VIOLENT BEHAVIORS WHERE THE CHILD CAN'T BE IN A HOME, AND MOST FOSTER PARENTS WON'T ACCEPT CHILDREN AT THAT HOUR WHO HAVE SIGNIFICANT SEXUAL ACTING OUT, FIRE STARTERS, CUTTERS OR HAVE VIOLENT TENDENCIES. THOSE ARE CHILDREN THAT GENERALLY DO NOT END UP IN A FOSTER HOME. SO JUST TO BE CLEAR, THE CHILDREN WHO ARE GENERALLY SPENDING OVERNIGHT ARE NOT KIDS WHO END UP GOING INTO A GENERAL FOSTER CARE PLACEMENT.

Q. YOU KEEP SAYING GENERALLY. SOME OF THOSE CHILDREN DO END UP IN FOSTER CARE PLACEMENT, CORRECT?

A. SOME DO, YES.

Q. AND HAVING MORE HOMES WOULD MAKE IT LESS LIKELY THAT YOU WOULD HAVE TO HAVE CHILDREN SLEEPING IN THE DHS OFFICE, WOULDN'T IT?

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE WITNESS: NOT NECESSARILY.

BY MR. RIENZI:

Q. BUT IT MIGHT, CORRECT?

MR. FIELD: OBJECTION, CALLS FOR

SPECULATION.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. IT'S PRIORITY FOR DHS TO RECRUIT LGBTQ FOSTER PARENTS, CORRECT?

A. AFFIRMING HOMES.

Q. SO ONE OF THEM IS TO RECRUIT LGBTQ AFFIRMING HOMES, CORRECT?

A. CORRECT.

Q. YOU ALSO HAVE A PRIORITY OF RECRUITING MORE LGBTQ FOSTER PARENTS, CORRECT?

A. CORRECT.

Q. YOU HAVE WORKED WITH THE MAYOR'S OFFICE OF LGBT AFFAIRS ON SOME OF THAT RECRUITMENT?

A. ALONG WITH OTHER PROVIDERS, YES.

Q. AND SO RECRUITING EVENTS CAN BE AIMED AT PARTICULAR SEGMENTS OF THE POPULATION?

A. AT ALL SEGMENTS, YES.

Q. THEY CAN ALSO BE AIMED AT PARTICULAR SEGMENTS, CORRECT?

A. YES.

Q. AGENCIES ARE NOT OBLIGATED TO RECRUIT EVERYONE ALL THE TIME, ARE THEY?

MR. FIELD: OBJECTION, YOUR HONOR. THAT TESTIMONY IS NOT REGARDING AGENCIES AT THE MOMENT.

THE COURT: SUSTAINED. I THINK WE HAVE BEEN THROUGH THIS ALREADY.

BY MR. RIENZI:

Q. ARE YOU FAMILIAR WITH THE MAYOR'S OFFICE OF LGBT AFFAIRS?

A. I AM.

Q. YOU FOLLOW THAT OFFICE ON TWITTER?

A. I DO.

Q. IT'S AN OFFICE OF THE CITY GOVERNMENT?

A. IT IS.

Q. THAT OFFICE EXISTS TO HELP PEOPLE OF PARTICULAR SEXUAL ORIENTATIONS?

MR. FIELD: OBJECTION, YOUR HONOR, TO THE EXTENT THE WITNESS IS AWARE OF THE OFFICE'S PURPOSE.

MR. RIENZI: YES. I AM ASKING THE QUESTION.

THE COURT: IF YOU KNOW.

THE WITNESS: I DON'T HAVE THE DEFINITION OF THEIR MISSION STATEMENT ON THERE, BUT THAT SOUNDS ABOUT RIGHT.

BY MR. RIENZI:

Q. I BELIEVE YOU SAID WHEN YOU DID YOUR INVESTIGATION -- AND I'M MOVING BACK UP SO I CAN SITUATE YOU. THIS MORNING YOU STARTED YOUR TESTIMONY BY TALKING ABOUT YOUR INVESTIGATION AFTER HEARING FROM THE PHILLY

INQUIRER REPORTER. DO YOU REMEMBER THAT?

A. I DO.

Q. WHEN YOU DID THAT INVESTIGATION, YOU ONLY CONTACTED FAITH-BASED FOSTER CARE AGENCIES, CORRECT?

A. THAT'S CORRECT.

Q. YOU DID NOT CONTACT ANY NONRELIGIOUS FOSTER CARE AGENCIES, CORRECT?

A. ACTUALLY, I DID SPEAK WITH ONE OTHER NONFAITH BASED FOSTER CARE AGENCY.

Q. WHICH ONE WAS THAT?

A. NORTHEAST TREATMENT CENTER.

Q. WHY DID YOU CONTACT NORTHEAST TREATMENT CENTER?

A. I HAVE A GOOD RELATIONSHIP WITH THE CEO AND WANTED TO ASK ABOUT THEIR PRACTICES.

Q. DID YOU TALK ABOUT CATHOLIC'S PRACTICES?

A. NO.

Q. AS TO ALL OF THE OTHER NONRELIGIOUS FOSTER CARE AGENCIES IN THE CITY, YOU DID NOT CALL THEM TO ASK THEM THEIR POLICY ABOUT LGBT COUPLE APPLICANTS, CORRECT?

A. NO.

Q. HAVE YOU EVER CALLED NONRELIGIOUS AGENCIES TO ASK THEM WHETHER THEY PERFORM HOME STUDIES FOR EVERYONE WHO ASKED THEM?

A. ASIDE FROM NORTHEAST TREATMENT CENTER, NO.

Q. HAVE YOU EVER CALLED NONRELIGIOUS AGENCIES TO

TELL THEM THEY MUST IMPORTANT PERFORM HOME STUDIES FOR EVERYONE WHO ASKS THEM?

A. NO.

Q. HAVE YOU EVER CALLED NONRELIGIOUS AGENCIES TO ASK IF THEY EVER REFER HOME STUDIES TO ANOTHER AGENCY?

A. NO.

Q. YOU HAD A MEETING WITH JAMES AMATO IN OR AROUND MARCH 15TH, CORRECT?

A. THAT'S CORRECT.

Q. WHERE DID THAT MEETING TAKE PLACE?

A. IN DEPUTY COMMISSIONER ALI'S CONFERENCE ROOM.

Q. THAT'S A GOVERNMENT OFFICE?

A. IT IS.

Q. AND WHO ATTENDED FOR THE CITY AT THAT MEETING?

A. IT WAS MYSELF, DEPUTY COMMISSIONER ALI, OUR ATTORNEY WAS PRESENT, AND JIM BLACK, JAMES AMATO, AS WELL AS COUNSEL FOR THE ARCHDIOCESE ATTENDED.

Q. DID YOU TAKE NOTES?

A. I DON'T RECALL.

Q. DO YOU RECALL IF ANYONE ELSE DID?

A. I BELIEVE OUR LEGAL COUNSEL DID.

Q. AT THAT MEETING YOU TOLD CATHOLIC THAT TIMES HAVE CHANGED, DIDN'T YOU?

A. I DID.

Q. AND YOU TOLD THEM THAT IT'S NOT 100 YEARS AGO

ANYMORE, DIDN'T YOU?

A. CATHOLIC SOCIAL SERVICES INDICATED THAT THEY HAD BEEN DOING THIS SERVICE FOR 100 YEARS. AND I EXPLAINED THAT WOMEN DIDN'T HAVE THE RIGHTS AND AFRICAN AMERICANS DIDN'T HAVE THE RIGHTS, AND I PROBABLY WOULD NOT BE SITTING IN THE ROOM IF IT WAS 100 YEARS AGO.

Q. YOU EXPLAINED TO THEM THAT IT WAS NOT 100 YEARS AGO ANYMORE, CORRECT?

MR. FIELD: ASKED AND ANSWERED.

THE WITNESS: I INDICATED, YES, THINGS HAVE CHANGED SINCE 100 YEARS AGO.

BY MR. RIENZI:

Q. YOU TOLD CATHOLIC THAT THEY SHOULD LISTEN TO POPE FRANCIS, DID YOU NOT?

A. I SAID IT WOULD BE GREAT IF WE FOLLOWED THE TEACHINGS OF POPE FRANCIS, THE VOICE OF THE CATHOLIC CHURCH.

Q. YOU TOLD CATHOLIC THAT THEY SHOULD NOT LISTEN TO ARCHBISHOP CHAPUT ON THIS ISSUE, CORRECT?

A. I DON'T BELIEVE THOSE WERE MY WORDS.

Q. SO ON ONE HAND YOU SAID IT WOULD BE GREAT IF WE WOULD LISTEN TO POPE FRANCIS, CORRECT?

A. UM-HUM.

Q. WAS THERE ANYONE ON THE OTHER SIDE YOU WERE SAYING THEY SHOULD LISTEN TO POPE FRANCIS INSTEAD OF?

A. I STATED THE FIRST PART OF THAT, THAT, YOU KNOW, IT WOULD BE GREAT IF WE LISTENED TO THE TEACHINGS AND THE WORDS OF OUR CURRENT POPE FRANCIS.

Q. AND YOU SAID THAT THEY SHOULD NOT LISTEN TO THE ARCHDIOCESE ON THIS ISSUE, CORRECT?

A. I ANSWERED THIS. I DON'T RECALL WHAT I SAID SPECIFICALLY.

Q. OKAY. SO YOU KNOW YOU SAID WE SHOULD LISTEN TO POPE FRANCIS, BUT YOU DON'T RECALL SAYING ANYTHING ABOUT WHO WOULD BE LISTENING TO POPE FRANCIS --

MR. FIELD: ASKED AND ANSWERED.

THE WITNESS: I DON'T RECALL SAYING THE ARCHBISHOP.

BY MR. RIENZI:

Q. DO YOU RECALL SAYING THE ARCHDIOCESE?

THE COURT: OVERRULED.

THE WITNESS: NO.

BY MR. RIENZI:

Q. DO YOU RECALL SAYING ANYONE ELSE IN DISTINCTION WITH POPE FRANCIS?

A. NO.

Q. YOU TOLD THEM THAT THE HOME STUDY ISSUE WAS GETTING ATTENTION AT THE HIGHEST LEVELS OF CITY GOVERNMENT, DIDN'T YOU?

A. I DID.

Q. OKAY. AND YOU WERE REFERRING IN PART TO THE MAYOR WHEN YOU SAID THAT, CORRECT?
A. AND MY CHAIN OF COMMAND, YES.
Q. SO WHEN YOU SAID THAT, YOU WERE REFERRING TO YOURSELF AS THE HIGHEST LEVELS OF CITY GOVERNMENT?
A. CERTAINLY THE MANAGING DIRECTOR'S OFFICE. SO IN THE CITY CHARTER I REPORT IN TO THE MANAGING DIRECTOR'S OFFICE AND SUBSEQUENTLY THE MAYOR.
Q. YOU HAD DISCUSSED THIS ISSUE WITH THE MAYOR BEFORE YOUR MEETING WITH CATHOLIC, CORRECT?
A. BRIEFLY.
Q. WHAT DID YOU SAY?
A. I SAID THAT I AM WORKING TO ADDRESS THE ISSUES. THERE IS A NUMBER OF CHILDREN, AND THAT WE WILL BRIEF HIM ONCE WE HAVE MADE DECISIONS ABOUT MOVING FORWARD.
Q. WHAT DID THE MAYOR SAY?
MR. FIELD: OBJECTION, ASSUMES FACTS NOT IN THE RECORD.
THE COURT: SUSTAINED.
BY MR. RIENZI:
Q. DID THE MAYOR ANSWER YOU?
MR. FIELD: OBJECTION, ASSUMES FACTS NOT IN RECORD.
MR. RIENZI: IT'S SIMPLY A QUESTION, YOUR HONOR. SHE SAID WHAT SHE TOLD THE MAYOR. I AM ASKING

WHAT THE MAYOR SAID BACK.

MR. FIELD: OBJECTION, HEARSAY.

THE COURT: SUSTAINED.

MR. RIENZI: THE CITY IS A DEFENDANT, YOUR HONOR. THE MAYOR IS THE MAYOR OF THE CITY. IT'S AN ADMISSION, YOUR HONOR.

THE COURT: SUSTAINED.

MR. FIELD: OBJECTION AS WELL TO THE EXTENT THERE WAS COUNSEL PRESENT.

BY MR. RIENZI:

Q. DID YOU KNOW THE MAYOR'S VIEWS BY THE TIME YOU SAT DOWN TO MEET WITH CATHOLIC?

A. NO.

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE COURT: SHE HAS ANSWERED.

BY MR. RIENZI:

Q. DID YOU DISCUSS CUTTING OFF INTAKE WITH THE MAYOR'S OFFICE?

A. NO.

Q. THE MAYOR IS YOUR BOSS?

A. HE IS THE HEAD OF THE CITY. MY DIRECT BOSS IS EVA GLADSTEIN.

Q. WHO IS EVA GLADSTEIN'S BOSS?

A. MIKE DIBERADINIS.

Q. WHO IS HIS BOSS?
A. THE MAYOR.
Q. WHO APPOINTED YOU?
A. THE MAYOR.
Q. DO YOU CONSIDER YOURSELF PART OF THE MAYOR'S ADMINISTRATION?
A. I DO.
Q. YOU KNOW THE MAYOR'S VIEWS ABOUT THE ARCHDIOCESE?
A. I DO NOW.
Q. WHEN DID YOU LEARN THE MAYOR'S VIEWS ABOUT THE ARCHDIOCESE?
A. THROUGH THIS LITIGATION.
Q. YOU KNOW THAT HE DOES NOT LIKE THE ARCHDIOCESE VERY MUCH, CORRECT?
A. I UNDERSTAND WHAT HAS BEEN PRESENTED, YES.
Q. DO YOU DOUBT THE TRUTHFULNESS OF WHAT HAS BEEN PRESENTED?
THE COURT: IN REGARD TO --
MR. RIENZI: THE MAYOR'S VIEWS ON THE ARCHDIOCESE.
THE WITNESS: I'M SORRY. CAN YOU REPEAT WHAT YOU ARE ASKING ME.
BY MR. RIENZI:
Q. WHEN YOU SAID YOU KNOW WHAT HAS BEEN PRESENTED.

AND I GUESS I AM ASKING, DO YOU DOUBT THE TRUTHFULNESS OF WHAT HAS BEEN PRESENTED? IT'S A LITTLE DIFFICULT BECAUSE YOU'RE SAYING YOU KNOW WHAT'S BEEN PRESENTED -- I WILL ASK YOU THIS. WHEN YOU SAY I KNOW WHAT'S BEEN PRESENTED, WHAT ARE YOU REFERRING TO?

A. I'M REFERRING TO THE EXHIBITS THAT YOU GUYS PROVIDED IN THIS SUBMISSION.

Q. OKAY.

MR. RIENZI: PERMISSION TO APPROACH, YOUR HONOR.

THE COURT: YES.

THE WITNESS: THE DATE OF MY WEDDING ANNIVERSARY.

MR. FIELD: MULTIPLE POINTS, BUT I WOULD LIKE TO START WITH AN OFFER OF PROOF ON THIS.

MR. RIENZI: SURE. SHE'S APPOINTED BY THE MAYOR. SHE IS A MEMBER OF THE MAYOR'S ADMINISTRATION. I THINK HER BOSS'S VIEWS ON THE RELIGIOUS ENTITY THAT IS AT ISSUE HERE ARE HIGHLY RELEVANT TO THE RELIGIOUS DISCRIMINATION CLAIM.

MR. FIELD: YOUR HONOR --

MR. RIENZI: I'D LIKE TO FINISH, PLEASE.

MR. FIELD: YES.

MR. RIENZI: SHE FOLLOWS MAYOR KENNEY ON TWITTER AND I AM SHOWING SOME OF HIS PUBLIC STATEMENTS

ON TWITTER ABOUT THE ARCHDIOCESE AND ABOUT THE POPE, WHO SHE TOLD THE ARCHDIOCESE IN A GOVERNMENT BUILDING WHO THEY SHOULD LISTEN TO. IT'S HIGHLY RELEVANT, YOUR HONOR.

MR. FIELD: YOUR HONOR, THIS STATEMENT IS FROM 14TH OF NOVEMBER 2014. THE WITNESS TESTIFIED SHE LEARNED ABOUT THIS MATERIAL THROUGH PLAINTIFF'S FILING IN THIS LITIGATION. I AM NOT CLEAR HOW IT'S RELEVANT TO THE TIMELINE OF THE QUESTIONS THAT COUNSEL IS ASKING HER.

THE COURT: I'M GOING TO SUSTAIN THE OBJECTION.

BY MR. RIENZI:

Q. MS. FIGUEROA, WHAT DO YOU KNOW ABOUT THE MAYOR'S VIEWS ABOUT THE ARCHDIOCESE, OTHER THAN WHAT YOU HAVE LEARNED IN THIS CASE?

A. NONE.

Q. NOTHING. SO UNTIL THIS CASE YOU HAD NO IDEA OF THE MAYOR'S VIEWS ABOUT THE CATHOLIC CHURCH?

A. THAT'S CORRECT.

Q. YOU FOLLOW MAYOR KENNEY ON TWITTER?

A. I FOLLOW A LOT OF PEOPLE ON TWITTER, YES.

Q. AND YOU FOLLOW MAYOR KENNEY ON TWITTER?

A. I DO.

Q. WHEN YOU SEE AT THE TOP OF THAT DOCUMENT IT SAYS

JIM KENNEY, AT JIM S. KENNEY --

MR. FIELD: YOUR HONOR, THIS DOCUMENT IS NOT IN THE RECORD. I'VE ALREADY OBJECTED TO IT.

THE COURT: AND I SUSTAINED THE OBJECTION.

MR. RIENZI: AND I'M JUST ASKING HER TO TELL ME IF SHE RECOGNIZES THE TWITTER HANDLE AS ONE THAT SHE FOLLOWS.

THE WITNESS: I'VE FOLLOWED THE MAYOR SINCE HE BECAME MAYOR, SO I WOULD NOT HAVE BEEN PRIVY TO THIS ONE.

BY MR. RIENZI:

Q. WHEN DID YOU GET ON TWITTER?

MR. FIELD: OBJECTION TO THE RELEVANCE OF THIS ENTIRE LINE OF QUESTIONING, YOUR HONOR.

THE COURT: SUSTAINED.

MR. RIENZI: YOUR HONOR, I WOULD LIKE TO MAKE AN OFFER OF PROOF ABOUT THE DOCUMENTS FROM THE MAYOR'S TWITTER ACCOUNT. I UNDERSTAND THAT YOU REJECTED THAT. I WOULD JUST LIKE TO MAKE AN OFFER SO THAT IT IS IN THE RECORD. MAY I DO THAT?

THE COURT: YES.

MR. RIENZI: MY OFFER OF PROOF IS AS FOLLOWS, YOUR HONOR. I WOULD LIKE TO QUESTION THE WITNESS ABOUT SEVERAL STATEMENTS HER BOSS, THE MAYOR,

HAS MADE ABOUT THE ARCHDIOCESE AND THE CATHOLIC CHURCH. AND THERE ARE JUST SEVERAL TWEETS THAT I PROPOSE TO ASK THE WITNESS ABOUT. THE FIRST ONE IS FROM NOVEMBER 14TH, 2014 SAYING: THE ARCH DON'T CARE ABOUT PEOPLE. IT'S ABOUT IMAGE AND MONEY. POPE FRANCIS NEEDS TO KICK SOME A-S-S HERE.

THE SECOND ONE IS A TWEET FROM THE MAYOR FROM JUNE 25TH, 2012 THAT SAYS: I COULD CARE LESS ABOUT THE PEOPLE AT THE ARCHDIOCESE.

THE NEXT ONE IS A TWEET FROM JULY 6TH, 2016 SAYING THAT: ARCHBISHOP CHAPUT'S, QUOTE, ACTIONS ARE NOT CHRISTIAN.

AND OUR ARGUMENT ABOUT THE RELEVANCE OF THOSE DOCUMENTS, YOUR HONOR, IS SIMPLY THAT THIS IS A CASE ABOUT RELIGIOUS DISCRIMINATION. THESE ARE STATEMENTS FROM THE WITNESS'S BOSS. AND SEVERAL CASES QUITE RECENTLY, ACTUALLY, INCLUDING SOME THAT MAY GET CITED BY THE SUPREME COURT THIS MORNING, HAVE TAKEN JUDICIAL NOTICE OF AND ALLOWED INTRODUCTION OF TWEETS FROM EXECUTIVES, OFFICE OF THE PRESIDENT OF THE UNITED STATES. AND I WOULD JUST POINT THE COURT TO INTERNATIONAL REFUGEE ASSISTANCE PROJECT VERSUS TRUMP, IN THE 4TH CIRCUIT, 883 F.3RD 233; COMMONWEALTH V BRADSHEER IN PENNSYLVANIA SUPERIOR COURT 2016 WL 7495120; AND HAWAII V TRUMP, WHICH FOR ALL I KNOW HAS

BEEN DECIDED BY THE SUPREME COURT THIS MORNING. OUR ARGUMENT IS THAT IN A RELIGIOUS DISCRIMINATION CASE ABOUT RELIGIOUS DISCRIMINATION BY THE CITY AGAINST THE ARCHDIOCESE, THAT THE WITNESS'S BOSS'S VIEWS ON THE ARCHDIOCESE ARE HIGHLY RELEVANT.

MR. FIELD: YOUR HONOR, I RENEW MY OBJECTION OF THESE DOCUMENTS THAT WERE ADDRESSED AT SIDEBAR YESTERDAY. I WOULD LIKE TO TRY TO INTRODUCE THEM AND THE PERIODIZATION OF MY PRIOR OBJECTION DOES NOT CHANGE. THESE ALL PREDATE THE DECISION AT ISSUE AND THE WITNESS HAS ALREADY TESTIFIED THAT SHE WAS NOT AWARE OF THIS INFORMATION AT THAT TIME.

THE COURT: SO THE OBJECTION IS SUSTAINED.

BY MR. RIENZI:

Q. YOU TESTIFIED YESTERDAY THAT PART OF YOUR JOB IS COMPLYING WITH STATE MANDATES, CORRECT?

A. THAT IS CORRECT.

Q. AND ONE OF THOSE STATE MANDATES IS PENNSYLVANIA'S RELIGIOUS FREEDOM PROTECTION ACT, CORRECT?

A. THAT IS CORRECT.

Q. AND YOU KNOW YOU HAVE OBLIGATIONS UNDER THAT LAW, CORRECT?

A. I DO.

Q. WHAT ARE YOUR OBLIGATIONS UNDER THAT LAW?
A. I DON'T KNOW THAT OFF THE TOP OF MY HEAD SO....
Q. OKAY. WHAT DOES THE DEPARTMENT DO TO ENSURE THAT IT COMPLIES WITH THAT LAW?
A. I AM NOT SURE. I DON'T KNOW.
Q. DO YOU UNDERSTAND THAT UNDER STATE LAW YOU CAN ONLY BURDEN SOMEONE'S RELIGIOUS EXERCISE IF YOU HAVE A COMPELLINGLY IMPORTANT REASON?
MR. FIELD: OBJECTION, YOUR HONOR. SHE ALREADY SAID SHE WAS NOT AWARE OF HER OBLIGATIONS UNDER THAT LAW.
MR. RIENZI: I DON'T BELIEVE THAT'S WHAT SHE SAID.
THE COURT: OVERRULED.
MR. RIENZI: I BELIEVE SHE SAID SHE IS AWARE.
THE COURT: OVERRULED.
BY MR. RIENZI:
Q. ARE YOU AWARE THAT UNDER THE RELIGIOUS FREEDOM PROTECTION ACT DHS CAN ONLY BURDEN SOMEONE'S RELIGIOUS EXERCISE IF THEY HAVE A COMPELLINGLY IMPORTANT REASON?
A. DO I UNDERSTAND IS THE QUESTION?
Q. DO YOU UNDERSTAND THAT THAT'S YOUR OBLIGATION?
A. I UNDERSTAND THAT, YES.
Q. HAVE YOU DONE ANYTHING TO ENSURE YOUR COMPLIANCE

WITH THAT OBLIGATION?

A. I AM NOT SURE THAT I UNDERSTAND THE QUESTION.

Q. AS YOU RUN YOUR DEPARTMENT, DO YOU DO ANYTHING TO MAKE SURE THAT YOU DON'T BURDEN PEOPLE'S RELIGIOUS EXERCISE?

A. YEAH, I AM NOT SURE I KNOW HOW TO ANSWER THAT QUESTION.

Q. CAN YOU NAME ANYTHING THAT YOUR DEPARTMENT DOES TO ENSURE THAT IT DOESN'T BURDEN PEOPLE'S RELIGIOUS EXERCISE?

A. SURE. WE DON'T PRAY BEFORE OUR MEETINGS.

Q. OKAY. WHAT ELSE?

A. WE DON'T HAVE ANY RELIGIOUS ARTIFACTS IN OUR OFFICES. WE DON'T REQUIRE OUR STAFF TO SIGN A PASTORAL REFERENCE TO WORK AT THE DEPARTMENT. I THINK THOSE ARE SOME GENERAL EXAMPLES OF WHAT THE CITY WOULD NOT DO AS A CITY EMPLOYEE.

Q. YOU KNOW THAT YOUR BOSS, THE MAYOR, HAS TAKEN A PUBLIC POSITION THAT HE DOES NOT LIKE RELIGIOUS FREEDOM LAWS, LIKE THE RELIGIOUS FREEDOM PROTECTION ACT?

A. I DON'T KNOW THAT PERSONALLY.

Q. YOU DON'T KNOW ANYTHING ABOUT HIS VIEWS ON RELIGIOUS LIBERTY LAWS?

A. I HAVE ANSWERED THAT BASED ON WHAT YOU HAVE PRESENTED HERE, BUT NOT WHAT YOU ARE ASKING.

Q. THE MAYOR NEVER TOLD YOU THAT ENFORCING THE RELIGIOUS FREEDOM PROTECTION ACT IS A PRIORITY OF HIS ADMINISTRATION?

MR. FIELD: OBJECTION, YOUR HONOR. WHAT IS THE RELEVANCE OF THIS LINE OF QUESTIONING?

THE COURT: SUSTAINED.

MR. FIELD: MOVE TO STRIKE.

THE COURT: WELL, SHE HAS NOT ANSWERED.

BY MR. RIENZI:

Q. YOU HAVE ASSERTED THAT YOU HAVE AN INTEREST IN COMPLYING WITH THE CITY'S FAIR PRACTICES ORDINANCE, CORRECT?

A. YES.

Q. AND YOU TESTIFIED YESTERDAY THAT YOU ARE RESPONSIBLE FOR MEETING FEDERAL MANDATES RELATED TO CHILD WELFARE WORK, CORRECT?

A. THAT'S CORRECT.

Q. YOU RECEIVED FEDERAL TANF FUNDING -- THAT'S TEMPORARY AID TO NEEDY FAMILIES FUNDING -- FOR YOUR FOSTER CARE PROGRAM, CORRECT?

A. THAT IS CORRECT.

Q. DHS HAS TO MAKE STATEMENTS TO THE FEDERAL GOVERNMENT ABOUT ITS COMPLIANCE WITH TANF REGULATIONS TO RECEIVE THAT MONEY, CORRECT?

A. THAT IS CORRECT.

Q. WHEN WAS THE LAST ONE YOU FILED?
A. I HAVE NO IDEA. MY FINANCE TEAM DOES THAT.
Q. DO YOU KNOW WHO SIGNS THAT?
MR. FIELD: OBJECTION TO RELEVANCE, YOUR HONOR.
MR. RIENZI: I WILL GET TO THAT IN A SECOND, YOUR HONOR.
THE COURT: OVERRULED.
THE WITNESS: THEY ARE PREPARED BY THE FINANCE DEPARTMENT, AND I SIGN THE TANF DOCUMENT THAT GETS SUBMITTED.
BY MR. RIENZI:
Q. AND YOU DON'T KNOW WHEN THE LAST ONE YOU SIGNED WAS?
A. I DON'T RECALL THE DATE.
Q. DO YOU REMEMBER ROUGHLY?
A. NO.
Q. DO YOU REMEMBER IF IT WAS BEFORE OR AFTER CLOSING INTAKE AT CATHOLIC?
A. THAT I DEFINITELY DON'T KNOW.
Q. OKAY. ARE YOU AWARE THAT UNDER FEDERAL FUNDING REQUIREMENTS YOU HAVE AN OBLIGATION NOT TO INTERFERE WITH A RELIGIOUS ORGANIZATION'S DEFINITION, PRACTICE OR EXPRESSION OF ITS RELIGIOUS BELIEFS?
MR. FIELD: OBJECTION TO THE EXTENT IT

CALLS FOR A LEGAL CONCLUSION.

THE COURT: OVERRULED. SHE CAN ANSWER.

THE WITNESS: TO THE EXTENT THE DEPARTMENT OF HUMAN SERVICES -- SO WE ARE A STATE LICENSED COUNTY ADMINISTERED SO THE COUNTY ADMINISTRATION CAN INDICATE ITS DELIVERED CHILD WELFARE SERVICES, SO WHILE THERE'S FEDERAL FUNDING AND STATE FUNDING, IT IS A COUNTY RUN SYSTEM.

BY MR. RIENZI:

Q. YOU MAKE CERTIFICATIONS TO THE FEDERAL GOVERNMENT ABOUT YOUR COMPLIANCE WITH TANF REGULATIONS, CORRECT?

A. THAT'S CORRECT.

Q. THAT INCLUDES CERTIFYING THAT YOU FOLLOW FEDERAL LAW ASSOCIATED WITH THOSE FINDS, CORRECT?

A. YES.

Q. AND ARE YOU AWARE THAT ONE OF THE FEDERAL LAWS ASSOCIATED WITH RECEIVING THOSE FUNDS, WHICH YOU CERTIFY THAT YOU FOLLOW, REQUIRES YOU TO ALLOW RELIGIOUS GROUPS TO RETAIN INDEPENDENCE IN THE DEFINITION, PRACTICE AND EXPRESSION OF THEIR RELIGIOUS BELIEFS?

A. YES.

Q. BUT YOU DON'T KNOW WHETHER YOU HAVE MADE THAT CERTIFICATION SINCE THE INTAKE CLOSURE AT CATHOLIC?

A. I DON'T. THEY HAPPEN QUARTERLY, SO I DON'T

RECALL WHEN THE LAST -- AND IT'S NOT ON A REGULAR STANDING SCHEDULE.

Q. WHEN YOU SIGNED THE LAST ONE, DID YOU DO ANY ANALYSIS OF WHETHER YOU HAD VIOLATED IT BY CLOSING INTAKE AT CATHOLIC?

MR. FIELD: OBJECTION, ASSUMES FACTS NOT IN RECORD.

THE COURT: YES, SUSTAINED.

BY MR. RIENZI:

Q. HAVE YOU THOUGHT ABOUT WHETHER YOU VIOLATED YOUR TANF FUNDING REQUIREMENTS TO THE FEDERAL GOVERNMENT BY CLOSING INTAKE AT CATHOLIC?

A. HAVE I HAD A THOUGHT ABOUT IT?

Q. HAVE YOU EVER THOUGHT ABOUT THAT?

A. I CAN'T SAY THAT I HAVE THOUGHT ABOUT THAT.

Q. OKAY. AND I SUPPOSE YOU HAVE NOT FIGURED OUT WHAT YOU ARE GOING TO SAY THE NEXT TIME YOU HAVE TO MAKE THAT CERTIFICATION?

A. WELL, CERTAINLY --

MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. DO YOU KNOW WHAT THE CONSEQUENCES ARE OF MAKING FALSE STATEMENTS TO THE FEDERAL GOVERNMENT IN THE

CONTEXT OF FEDERAL FUNDING?

A. NOT OFF THE TOP OF MY HEAD.

Q. DO YOU KNOW THAT YOUR AGENCY COULD LOSE ITS FEDERAL FUNDING IF IT MAKES FALSE STATEMENTS TO THE FEDERAL GOVERNMENT ABOUT ITS COMPLIANCE WITH TANF REGULATIONS?

A. THAT SOUNDS PROBABLY ABOUT RIGHT.

Q. YOU UNDERSTAND YOU DO HAVE AN OBLIGATION TO OBEY FEDERAL LAW?

A. I DO.

Q. WOULD YOU AGREE WITH ME THAT IT'S A COMPELLINGLY IMPORTANT INTEREST OF YOURS TO OBEY FEDERAL LAW?

THE COURT: COMPELLING?

MR. RIENZI: COMPELLING.

BY MR. RIENZI:

Q. HOW ABOUT, WOULD YOU AGREE WITH ME YOU HAVE A REALLY IMPORTANT --

MR. FIELD: OBJECTION, CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

BY MR. RIENZI:

Q. WOULD YOU AGREE WITH ME THAT YOU HAVE A REALLY IMPORTANT INTEREST --

MR. FIELD: ASKING FOR AN OFFER OF PROOF OF THIS LINE OF QUESTIONING, YOUR HONOR.

THE COURT: SHE SAYS SHE HAS AN INTEREST.

MR. RIENZI: IN FOLLOWING FEDERAL LAW? DID I GET THAT ANSWER? I APOLOGIZE.

THE COURT: SHE DID.

THE WITNESS: I DID.

MR. RIENZI: TERRIFIC. THANK YOU.

BY MR. RIENZI:

Q. HAS DHS INFORMED THE FEDERAL GOVERNMENT ABOUT ITS INTAKE FREEZE AT CATHOLIC?

A. NO. WE INFORMED THE STATE.

Q. BUT YOU HAVE NOT INFORMED THE FEDERAL DEPARTMENT OF HEALTH AND HUMAN SERVICES WHO ADMINISTERS YOUR TANF FUNDING?

A. THE STATE ACTUALLY WORKS WITH THE FEDS IN REGARDS TO OUR TANF FUNDING.

Q. DO YOU KNOW IF THE STATE HAS INFORMED THE FEDERAL GOVERNMENT ABOUT --

A. I DON'T.

Q. -- YOUR INTAKE CLOSURE?

A. I DON'T.

MR. RIENZI: IF I CAN JUST HAVE A BRIEF MINUTE, YOUR HONOR.

THE COURT: YES.

(PAUSE.)

THE COURT: COUNSEL, HOW LONG WILL YOU BE? WE NEED TO TAKE A BREAK.

MR. RIENZI: YOUR HONOR, CAN WE TAKE A VERY SHORT BREAK HOWEVER LONG YOU WANT, AND I WILL BE READY BY THE TIME YOU SAY WE SHOULD GO.

THE COURT: WE WILL TAKE A FIVE MINUTE RECESS.

MR. RIENZI: THANK YOU, YOUR HONOR.

THE CLERK: ALL RISE.

(BREAK TAKEN.)

THE COURT: YOU MAY BE SEATED. GOOD AFTERNOON, COUNSEL. YOU CAN CONTINUE.

MR. RIENZI: THANK YOU, YOUR HONOR.

BY MR. RIENZI:

Q. MS. FIGUEROA, EARLIER YOU SAID THAT YOU THOUGHT CATHOLIC VIOLATED THE CONTRACT AND YOU REFERRED TO THE FAIR PRACTICES ORDINANCE PORTION OF THE CONTRACT. DO YOU RECALL THAT?

A. THEY DIDN'T COMPLY WITH THE CONTRACT.

Q. YES. AND YOU SAID ONE OF THE PORTIONS YOU BELIEVE THEY DID NOT COMPLY WITH IS THE FAIR PRACTICES ORDINANCE PART OF THE CONTRACT, IS THAT CORRECT?

A. YES, THAT'S RIGHT.

Q. CAN I DIRECT YOUR ATTENTION --

MR. RIENZI: MAY I APPROACH, YOUR HONOR?

THE COURT: YES.

BY MR. RIENZI:

Q. I JUST DON'T KNOW WHAT EXHIBIT NUMBER THE CONTRACT IS. SO PAGE 97 OF EXHIBIT 15, PLEASE. I WOULD PARTICULARLY LIKE TO DIRECT YOUR ATTENTION TO PARAGRAPH 15.1.

A. YES.

Q. AND JUST ASK, IS THAT THE PROVISION YOU HAD IN MIND WHEN YOU TESTIFIED EARLIER?

MR. FIELD: OBJECTION TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION.

THE COURT: OVERRULED.

THE WITNESS: I'M SORRY.

BY MR. RIENZI:

Q. IS 15.1 THE PROVISION YOU HAD IN MIND EARLIER WHEN YOU SAID CATHOLIC HAD VIOLATED THE FAIR PRACTICES PORTION OF THE CONTRACT?

MR. FIELD: OBJECTION. IT MISCHARACTERIZES THE WITNESS'S TESTIMONY. I DON'T BELIEVE SHE SAID SHE HAD A SPECIFIC PROVISION IN MIND, YOUR HONOR.

THE COURT: WELL, THE QUESTION IS, IS THAT THE PROVISION?

THE WITNESS: 15.1 REFERENCES THE FAIR PRACTICES ORDINANCE.

BY MR. RIENZI:

Q. IS THAT THE PROVISION YOU HAD IN MIND WHEN YOU

SAID THAT YOU THOUGHT THEY VIOLATED THE FAIR PRACTICES PORTION OF THE CONTRACT?

A. THIS IS ONE REFERENCE TO THE NONDISCRIMINATION FAIR PRACTICE.

Q. YOU DON'T KNOW EITHER WAY WHETHER THIS IS THE PROVISION YOU HAD IN MIND?

A. I THINK WE VISITED THE FACT THAT THIS IS A VERY LONG DOCUMENT AND SO WITHOUT GOING INTO EVERY SINGLE PAGE WHERE ELSE IT'S REFERENCED I CANNOT CITE RIGHT NOW.

Q. BUT YOU DON'T KNOW ANY OTHER ONE THAT YOU WERE THINKING OF BEFORE?

A. THAT'S NOT WHAT I SAID.

Q. I'M SORRY. I AM JUST TRYING TO GET A SENSE OF WHAT YOU WERE THINKING OF WHEN YOU TOLD ME THAT THEY VIOLATED THE FAIR PRACTICES PORTION OF THE CONTRACT.

A. THAT'S THE FAIR PRACTICE ORDINANCE ITSELF, AND I ALSO REFERENCED TO THE SERVICES PORTION OF THEIR CONTRACT AND THE DEFINITION OF SERVICES.

Q. NOTHING ELSE THAT YOU CAN THINK OF?

A. AS IT RELATES TO WHAT?

Q. AS IT RELATES TO YOUR CLAIM THAT CATHOLIC VIOLATED THE CONTRACT.

A. I DON'T THINK THAT'S ACTUALLY WHAT I SAID. I SAID THAT -- IF WE ARE TALKING ABOUT INTAKE CLOSURE OR IN TERMS OF THE MAKING OF THIS DECISION. COULD YOU BE

MORE CLEAR?

Q. WE ARE TALKING ABOUT YOUR CLAIM EARLIER THAT CATHOLIC VIOLATED THE CONTRACT.

A. I DIDN'T USE THE TERM. I SAID THAT THEY WERE -- INABILITY TO COMPLY, AND I SAID THAT IT WAS CLEAR THAT THEY COULD BE VIOLATING.

Q. SO YOU ARE NOT SURE WHETHER YOU THINK CATHOLIC HAS VIOLATED THIS CONTRACT YET?

A. WELL, THEY HAVE ISSUED STATEMENTS CLEARLY THEIR POSITION.

Q. BUT IT'S POSSIBLE THEY HAVE NOT VIOLATED THE CONTRACT YET?

MR. FIELD: OBJECTION TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. IS YOUR TESTIMONY THAT THEY HAVE VIOLATED IT OR THAT THEY MIGHT VIOLATE THE CONTRACT?

A. ARE YOU ASKING MY OPINION AS OF RIGHT NOW OR ARE YOU ASKING YOU ME MY OPINION AS IT RELATES TO CLOSING INTAKE?

Q. AS IT RELATES TO CLOSING INTAKE. WAS YOUR OPINION THAT THEY HAD VIOLATED THE CONTRACT OR MIGHT VIOLATE THE CONTRACT?

A. WHEN I CLOSED INTAKE IT WAS THAT THEY MAY HAVE

VIOLATED THEIR CONTRACT.

Q. AND HAVE YOU COME TO THE VIEW OR HAVE YOU COME TO A VIEW AS TO WHETHER THE FAILURE TO DO HOME STUDIES FOR SAME-SEX COUPLES THAT YOU CITED EARLIER IS A VIOLATION OF THE CONTRACT?

MR. FIELD: OBJECTION, TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. DO YOU HAVE A VIEW TODAY AS TO WHETHER CATHOLIC'S POSITION ON NOT DOING HOME STUDIES FOR SAME-SEX COUPLES IS A VIOLATION --

MR. FIELD: OBJECTION, TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: SUSTAINED.

MR. RIENZI: YOUR HONOR, SHE SIGNED THIS CONTRACT. I AM JUST ASKING HER WHETHER SHE THINKS IT HAS BEEN VIOLATED OR MIGHT BE VIOLATED. THOSE ARE TWO VERY DIFFERENT THINGS, AND SHE IS THE SIGNER OF THE CONTRACT.

MR. FIELD: YOUR HONOR, HE CAN ASK HER ABOUT HER VIEW OF HOME STUDIES AND CATHOLIC'S OBLIGATION, BUT HE'S ASKING FOR A LEGAL DETERMINATION UNDER THE CONTRACT, WHICH SPEAKS FOR ITSELF.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. DOES DHS HAVE A POSITION ABOUT WHETHER CATHOLIC HAS VIOLATED THIS CONTRACT IN REGARDS TO HOME STUDIES FOR SAME-SEX PARENTS?

MR. FIELD: SAME OBJECTION, YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. DO YOU UNDERSTAND UNDER THIS CONTRACT THAT THE FAIR PRACTICES ORDINANCE ONLY APPLIES IF FOSTER CARE IS A PUBLIC ACCOMMODATION?

MR. FIELD: OBJECTION, TO THE EXTENT IT CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: YES, SUSTAINED.

BY MR. RIENZI:

Q. DO YOU UNDERSTAND THAT THE DIRECT PROHIBITION OF DISCRIMINATION, 15.1, ONLY APPLIES TO RACE, COLOR, RELIGION AND NATIONAL ORIGIN?

MR. FIELD: OBJECTION, CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: SUSTAINED.

MR. RIENZI: YOUR HONOR, IF I MAY ARGUE THE POINT FOR A MOMENT.

THE COURT: NO.

BY MR. RIENZI:

Q. MS. FIGUEROA, YOU TESTIFIED EARLIER THAT THE CRU

REFERRAL PROCESS -- STRIKE THAT.

YOU TESTIFIED EARLIER, I BELIEVE, THAT THERE HAS BEEN NO IMPACT ON THE CRU REFERRAL PROCESS FROM THE CLOSURE OF INTAKE, IS THAT CORRECT?

MR. FIELD: OBJECTION, MISCHARACTERIZES THE WITNESS'S TESTIMONY.

THE COURT: OVERRULED. SHE CAN ANSWER.

THE WITNESS: I DON'T BELIEVE THAT'S WHAT I SAID.

BY MR. RIENZI:

Q. HAS THE INTAKE CLOSURE MADE IT MORE DIFFICULT FOR CRU TO PLACE CHILDREN WITH FAMILIES THROUGH CATHOLIC?

A. NO.

Q. AND YOUR REASON FOR SAYING NO IS THAT YOU HAVE SET UP A PROCESS BY WHICH PEOPLE CAN ASK DHS TO MAKE EXCEPTIONS, IS THAT CORRECT?

MR. FIELD: OBJECTION, YOUR HONOR. IF I CAN JUST ASK FOR A CLARIFICATION IF COUNSEL IS TALKING ABOUT CATHOLIC CUA OR CATHOLIC SOCIAL SERVICES.

MR. RIENZI: CATHOLIC SOCIAL SERVICES.

THE COURT: OKAY. YOU MAY ANSWER.

THE WITNESS: CAN YOU REPEAT THE QUESTION.

BY MR. RIENZI:

Q. SURE. YOU HAVE CLOSED INTAKE AT CATHOLIC SOCIAL SERVICES, CORRECT?

A. FOSTER CARE.

Q. FOSTER CARE INTAKE AT CATHOLIC SOCIAL SERVICES, CORRECT?

A. THAT'S CORRECT.

Q. AND I BELIEVE YOUR TESTIMONY IS THAT THERE HAS BEEN NO IMPACT ON THE ABILITY OF THE CRU TO PLACE CHILDREN IN FAMILIES WORKING WITH CATHOLIC, IS THAT CORRECT?

A. NO. I DON'T UNDERSTAND THE LAST PART OF YOUR QUESTION.

Q. THE CLOSURE OF INTAKE MAKES IT HARDER TO PLACE CHILDREN IN FAMILIES THROUGH CATHOLIC, CORRECT?

A. THE CLOSURE OF INTAKE MAKES IT HARDER FOR CRU?

Q. YES.

A. NO.

Q. WHY DO YOU SAY NO?

A. BECAUSE WE HAVE NOT SEEN AN IMPACT IN OUR NUMBER OF AVAILABILITY OR THE IMPACT IT'S HAD ON CONGREGATE CARE OR THE USE OF THE CHILD CARE ROOM.

Q. WHEN YOU'VE PLACED CHILDREN AT CATHOLIC DURING THE CLOSURE OF INTAKE, THAT HAS NOT BEEN THROUGH THE NORMAL CRU REFERRAL PROCESS, HAS IT?

MR. FIELD: OBJECTION TO THE

CHARACTERIZATION OF THE NORMAL PROCESS, YOUR HONOR.

THE COURT: OVERRULED.

THE WITNESS: REPEAT THE QUESTION.

BY MR. RIENZI:

Q. WHEN YOU HAVE PLACED CHILDREN IN FAMILIES THROUGH CATHOLIC DURING THE INTAKE CLOSURE, THAT HAS NOT OCCURRED THROUGH THE USUAL CRU REFERRAL PROCESS, CORRECT?

A. DO YOU MEAN IN TERMS OF HAVING A WAIVER OR AN EXCEPTION RELATED TO SPECIAL CASES?

Q. I WOULD LIKE YOU TO COMPARE WHAT IT WAS LIKE BEFORE THE INTAKE CLOSURE TO WHAT IT IS LIKE NOW.

A. I AM NOT SURE WHAT YOU ARE ASKING ME TO COMPARE.

Q. BEFORE THE INTAKE CLOSURE DID YOU OR MS. ALI NEED TO BE CONSULTED EVERY TIME A CHILD WOULD BE PLACED WITH CATHOLIC?

A. WE'RE CONSULTED EVERY TIME THERE IS A CONGREGATE CARE PLACEMENT, YES.

Q. DID YOU AND MS. ALI NEED TO BE CONSULTED EVERY TIME THERE WAS A PLACEMENT WITH CATHOLIC BEFORE INTAKE CLOSURE?

A. NOT EVERY TIME.

Q. AFTER THE INTAKE CLOSURE YOU OR MS. ALI MUST BE CONTACTED EVERY TIME THERE IS A PLACEMENT WITH CATHOLIC, CORRECT?

A. THAT'S CORRECT, ALONG WITH OTHER PROVIDERS THAT HAVE THEIR INTAKE CLOSED.

Q. WHO ELSE HAS THEIR INTAKE CLOSED?

A. CAN WE PUBLICLY SAY THAT, SINCE THERE'S -- I MEAN, THAT'S NOT SOMETHING WE -- I AM JUST ASKING.

Q. I DON'T KNOW THE ANSWER TO THAT. I AM HAPPY TO --

MR. FIELD: YOUR HONOR, CAN WE HAVE A MINUTE?

MR. RIENZI: LET ME ASK A MORE GENERAL QUESTION TO SEE IF I CAN --

BY MR. RIENZI:

Q. YOU HAVE ALREADY MENTIONED BETHANY AS HAVING AN INTAKE CLOSURE, WHICH I BELIEVE IS A PUBLICLY KNOWN FACT, CORRECT?

A. THAT'S CORRECT, AND THERE IS, I BELIEVE, AT LEAST TWO TO THREE OTHER ORGANIZATIONS RIGHT NOW THAT HAVE THEIR INTAKE CLOSED.

Q. THANK YOU.

YOU SPOKE BEFORE ABOUT A WAIVER OR EXCEPTIONS POLICY, CORRECT?

A. PRACTICE, YES.

Q. OKAY. IS THERE ANY WRITTEN POLICY THAT GOVERNS HOW THAT PRACTICE WORKS?

A. NO.

Q. HOW DOES THAT PROCESS WORK?
A. PRACTICE OR PROCESS -- PRACTICE?
Q. HOW DOES YOUR WAIVER OR EXCEPTIONS PRACTICE WORK?
A. WE RIGHT NOW ARE GENERALLY NOTIFIED DIRECTLY BY THE -- EITHER THE ON-CALL DIRECTOR IF IT'S DURING THE DAY. IF IT'S A STAFF MEMBER THE CRU ELEVATES IT THROUGH -- TO MY E-MAIL AS WELL AS TO COMMISSIONER ALI.
Q. BUT YOU DON'T HAVE ANY WRITTEN POLICY THAT GOVERNS HOW YOU DECIDE WHETHER TO MAKE AN EXCEPTION?
A. THERE ARE A NUMBER OF THINGS THAT WE DO IN PRACTICE THAT WE DON'T HAVE A SPECIFIC POLICY FOR.
Q. AND THIS IS ONE OF THEM. YOU DO NOT HAVE A WRITTEN POLICY ON THIS.
A. THAT'S CORRECT, YES.
Q. YOU JUST MAKE INDIVIDUALIZED ASSESSMENTS OF WHAT IS THE RIGHT THING TO DO IN A PARTICULAR CIRCUMSTANCE. IS THAT FAIR?
A. IT'S FAIR TO SAY THAT WE TREAT EACH CHILD INDIVIDUALLY, YES.
Q. AND FOR THIS EXCEPTIONS PROCESS YOU MAKE INDIVIDUALIZED ASSESSMENTS, CORRECT?
A. THAT'S CORRECT.
Q. YOU HAVE NEVER COMMUNICATED YOUR WAIVER POLICY TO -- STRIKE THAT.

YOU HAVE NEVER COMMUNICATED YOUR WAIVER POLICY IN WRITING TO THE VARIOUS CUA'S, CORRECT?

A. THERE WAS AN E-MAIL SENT BY MS. ALI INFORMING THEM REGARDING THE INSURANCE THAT CRU HAD TO DO ALL OF THE PLACEMENTS.

Q. AND -- I'M SORRY. IS YOUR TESTIMONY THAT THAT E-MAIL INFORMED THEM -- AND I DON'T MEAN TO MAKE YOU GUESS. WOULD YOU LIKE ME TO GET THE E-MAIL?

A. NO. YOU GUYS ENTERED IT INTO EVIDENCE YESTERDAY WITH THE E-MAIL THAT WAS SENT FROM STACY BOYD FOR THE DIRECTION OF MS. ALI TO THE CUA LEADERSHIP.

Q. RIGHT. WE ARE TALKING ABOUT THE SAME E-MAIL. AT A CERTAIN POINT IF YOU NEED TO SEE IT, LET ME KNOW. I DON'T WANT TO -- IT'S NOT QUIZZING YOUR MEMORY.

A. SURE.

Q. THAT E-MAIL SAID NOTHING ABOUT AN EXCEPTIONS POLICY, CORRECT?

A. I THINK -- ACTUALLY, IF WE ARE GOING TO TALK SPECIFICALLY ABOUT THE E-MAIL, I WOULD LIKE A COPY.

Q. SURE. THIS HAS BEEN PREVIOUSLY MARKED AS AN EXHIBIT. I DON'T KNOW THE NUMBER.

MR. FIELD: IT'S EXHIBIT 3.

BY MR. RIENZI:

Q. AND MS. FIGUEROA, IS THIS THE E-MAIL THAT YOU AND I WERE TALKING ABOUT A MOMENT AGO?

A. THIS IS, YES.

Q. THIS E-MAIL DOES NOT INFORM CUA LEADERSHIP ABOUT THE AVAILABILITY OF EXCEPTIONS, CORRECT?

A. IT SAYS IF YOU HAVE QUESTIONS ABOUT A CASE, PLEASE CONTACT ME BY PHONE OR E-MAIL.

Q. IT DOESN'T SAY ANY EXCEPTIONS WILL BE GRANTED, CORRECT?

A. IT SAYS IF YOU HAVE A QUESTION --

Q. I AGREE.

A. -- ABOUT A CASE.

Q. IT DOES NOT SAY EXCEPTIONS WILL BE GRANTED, CORRECT?

A. NO, IT DOES NOT SAY THAT.

Q. IT DOES NOT INFORM THEM ON WHAT BASIS YOU MIGHT MAKE AN EXCEPTION, CORRECT?

A. NO, IT DOES NOT.

Q. AND YOU HAVE NO WAY OF KNOWING WHETHER YOUR OFFICE IS ACTUALLY BEING NOTIFIED OF ALL THE SITUATIONS IN WHICH, FOR EXAMPLE, THERE COULD BE A SIBLING PLACEMENT, CORRECT?

A. I AM NOT SURE IF THAT'S ACCURATE. THERE'S A LOT OF COMMUNICATION THAT HAPPENS VERBALLY WITH OUR CUA'S THROUGH BOTH THE DIRECTOR AND SUPERVISORY MEETINGS. SO WE TALK ABOUT PLACEMENT DISRUPTIONS PRETTY SIGNIFICANTLY WITH OUR CUA'S.

Q. AS YOU SIT HERE UNDER OATH, YOU DON'T KNOW EITHER WAY WHETHER YOUR OFFICE GETS TOLD ABOUT ALL OF THE POSSIBLE SIBLING PLACEMENTS, CORRECT? YOU JUST DON'T KNOW?

A. TRUE.

Q. AND YOU DON'T KNOW IF YOU FIND OUT ABOUT ALL OF THE SITUATIONS WHERE THERE IS A PRIOR FOSTER CARE PARENT AS WITH DOE CHILD NUMBER 1, CORRECT?

MR. FIELD: OBJECTION, TO THE EXTENT THAT IT CHARACTERIZES DOE CHILD NUMBER 1 PLACEMENT.

THE COURT: I AM GOING TO SUSTAIN THE OBJECTION.

BY MR. RIENZI:

Q. YOU SAID EARLIER THAT YOU HAD OFFERED CATHOLIC THE ABILITY TO ENTER INTO THE SAME FULL CONTRACT. IS THAT WHAT YOU SAID?

A. I SAID WE OFFER THEM OPPORTUNITY TO ENTER INTO A FULL CONTRACT.

Q. IT'S NOT THE SAME FULL CONTRACT THAT THEY HAVE PREVIOUSLY ENTERED INTO?

A. FOR THE SAME SERVICES?

Q. YES. IN OTHER WORDS, YOU WOULD BE CHANGING --

A. IT IS FOR THE SAME SERVICES.

Q. I AM GOING TO HAND YOU A DOCUMENT WHICH HAS PREVIOUSLY BEEN MARKED AS PLAINTIFF'S EXHIBIT 13. AND

THAT'S A LETTER FROM THE LAW DEPARTMENT, WHO ARE YOUR LAWYERS IN THIS CASE, CORRECT?

A. YES. THIS IS THE LETTER PRIOR TO SENDING THE AWARD LETTER. SO THIS IS DATED IN REGARDS TO THE LINE OF QUESTIONS YOU ARE ASKING ME.

Q. I WOULD LIKE TO TURN TO PAGE 2 OF THAT DOCUMENT, PLEASE. IN THE THIRD FULL PARAGRAPH FROM THE TOP, THE LAST SENTENCE OF THAT PARAGRAPH READS: WE BELIEVE OUR CURRENT CONTRACT WITH CSS IS QUITE CLEAR THAT THIS IS ALL RIGHT.

A. DID YOU SAY SECOND OR THIRD PARAGRAPH?

Q. THIRD PARAGRAPH FROM THE TOP, SECOND PAGE, THIRD PARAGRAPH FROM THE TOP. THE PARAGRAPH BEGINS "PLEASE ALSO NOTE."

A. SORRY, THAT'S PAGE 3.

Q. I APOLOGIZE. SORRY ABOUT THAT.

A. GO AHEAD. SORRY.

Q. THE LAST SENTENCE OF THE THIRD PARAGRAPH READS: WE BELIEVE OUR CURRENT CONTRACT WITH CSS IS QUITE CLEAR THAT THIS IS ALL RIGHT, BUT PLEASE BE ADVISED THAT ANY FURTHER CONTRACTS WITH CSS WILL BE EXPLICIT IN THIS REGARD. DO YOU SEE THAT?

A. I DO.

Q. AND ANY FUTURE CONTRACT THAT YOU ENTER INTO WITH CSS YOU HAVE TOLD CSS YOU PLAN TO HAVE A MORE EXPLICIT

DISCRIMINATION POLICY IN THAT CONTRACT, CORRECT?

A. THE CLARITY REGARDING THE POLICY WILL BE MADE AVAILABLE TO ALL CONTRACTED PROVIDERS, NOT JUST CSS.

Q. AND WHEN YOU SAID BETHANY IS GOING TO ENTER INTO A NEW CONTRACT, THAT NEW CONTRACT IS NOT THE SAME AS THEIR OLD CONTRACT, IS IT?

A. IT IS THE SAME CONTRACT WITH EXPLICIT LANGUAGE DEFINING THE EXPECTATIONS.

Q. SO IT'S THE SAME, BUT WITH DIFFERENT LANGUAGE ON THE KEY ISSUE, CORRECT?

MR. FIELD: OBJECTION TO THE REFERENCE "KEY ISSUE," YOUR HONOR.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. IT'S THE SAME WITH DIFFERENT LANGUAGE THAT IS BEING CHANGED IN ORDER TO MORE DIRECTLY ADDRESS THE QUESTION OF HOME STUDIES FOR SAME-SEX FOSTER COUPLES, CORRECT?

A. CAN YOU REPEAT THAT?

Q. SURE. I AM TRYING TO FIGURE OUT THE CONTRACT THAT YOU WERE SAYING BEFORE THAT DHS WOULD GIVE CATHOLIC IS THE SAME FULL CONTRACT THEY HAD BEFORE OR IS A CHANGED CONTRACT ON THE NONDISCRIMINATION ISSUE?

A. I DON'T HAVE THE CONTRACT IN FRONT OF ME, BUT JUST TO REPEAT WHAT WAS SHARED WITH CATHOLIC SOCIAL

SERVICES, IT WOULD BE EXPLICIT IN REGARD, IN TERMS TO WHAT IS REQUIRED.

Q. THE CURRENT CONTRACT IS NOT EXPLICIT, CORRECT?

A. I BELIEVE RIGHT, IT MEANS PROVIDING FURTHER CLARITY.

Q. IN THE PAST YOU HAVE FREQUENTLY LET AGENCIES CONTINUE FOR MONTHS AFTER THE EXPIRATION OF A CONTRACT, IS THAT CORRECT?

A. WHEN THERE IS A RENEWAL EXPECTED AND IT'S BEEN CLEARED BY BOTH THE PROVIDER AND THE CITY THAT THE EXPECTATION IS TO MOVE FORWARD IN COMPLIANCE WITH THAT CONTRACT, YES.

Q. AND IN THOSE SITUATIONS SOMETIMES YOU OPERATE FOR MONTHS UNDER THE OLD CONTRACT?

A. THAT IS CORRECT.

MR. FIELD: THAT CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

THE COURT: OVERRULED.

BY MR. RIENZI:

Q. YOU TALKED EARLIER ABOUT POSSIBLY CHANGING CONTRACT TERMS TO SHIFT FROM PER DIEM TO COST REIMBURSEMENT. DO YOU RECALL THAT TESTIMONY?

A. THAT WAS AN EXAMPLE WHAT WE DID WITH A PROVIDER THAT WAS CLOSING, YES.

Q. IN THAT CIRCUMSTANCE YOU ARE NOT DOING ANY NEW

REFERRALS, IS THAT CORRECT?

A. THAT'S CORRECT.

MR. RIENZI: MY LAST QUESTION AND I WANT TO MAKE ONE PROFFER, ONE LAST DOCUMENT, YOUR HONOR.

BY MR. RIENZI:

Q. MY LAST QUESTION, THOUGH, IS, I BELIEVE WE TALKED BEFORE ABOUT WHETHER YOU SPOKE WITH THE MAYOR. AND I JUST WANT TO BE CLEAR. HAVE YOU HAD ANY CONVERSATIONS WITH ANYONE IN THE MAYOR'S OFFICE ABOUT WHETHER THIS CONFLICT WITH THE ARCHDIOCESE IS POLITICALLY USEFUL?

MR. FIELD: OBJECTION TO THE SCOPE OF THE QUESTION, YOUR HONOR.

THE COURT: YES, SUSTAINED.

MR. RIENZI: YOUR HONOR, MY ONE PROFFER. THERE IS ONE ADDITIONAL MAYOR KENNEY TWEET THAT I JUST WANT TO MAKE THE PROFFER ON. I UNDERSTAND THAT IT WILL ALMOST CERTAINLY BE COVERED BY YOUR PRIOR RULING. MAY I JUST MAKE THE OFFER OUT LOUD?

THE COURT: YES.

MR. RIENZI: IT'S A APRIL 9, 2015 TWEET BY MAYOR KENNEY AT JIM F. KENNEY. IT SAYS: LOVE THIS, HASHTAG PHILADELPHIA COUNCIL, INVITE ALL AFFECTED BY RFRA LAWS TO CITY OF BROTHERLY LOVE, RANKED THE NUMBER ONE HASHTAG LGBT FRIENDLY BY HRC.

AND MY ARGUMENT WOULD SIMPLY BE THIS, IS MS. FIGUEROA'S BOSS DEMONSTRATING THAT HE DOES NOT LIKE RELIGIOUS FREEDOM LAWS VERY MUCH.

THE COURT: OKAY, IF THAT'S YOUR ARGUMENT.

MR. RIENZI: I HAVE PUT IT IN THE RECORD, AND I AM DONE.

THANK YOU VERY MUCH, MS. FIGUEROA.

THE COURT: OKAY. ANY REDIRECT?

MR. FIELD: JUST A FEW QUESTIONS, YOUR HONOR.

REDIRECT EXAMINATION

BY MR. FIELD:

Q. COMMISSIONER FIGUEROA, I WILL TRY AND BE BRIEF. WHEN YOU STARTED YOUR TESTIMONY TWO DAYS AGO NOW, YOU TALKED ABOUT THE JESUIT -- YOU WORKED FOR THE JESUIT VOLUNTEER CORPS IN YOUR FAITH. JUST TO CLARIFY FOR THE RECORD, IF YOU ARE COMFORTABLE, WOULD YOU MIND SPECIFYING YOUR RELIGIOUS FAITH?

A. SURE. I AM CATHOLIC. I HAVE BEEN BORN AND RAISED CATHOLIC AND I PRACTICE AS A CATHOLIC AND JESUITS ARE AN ORDER, A DENOMINATION OF PRIESTHOOD.

Q. THANK YOU.

IF YOU COULD TURN FOR A MOMENT TO THE EXHIBIT THAT HAS BEEN ENTERED AS P 13. COUNSEL WAS JUST

SHOWING IT TO YOU. THIS IS THE LETTER --

A. THIS ONE, YES. IT WAS NOT MARKED. I'M SORRY, THIS ONE?

Q. YES.

MR. FIELD: AND I BELIEVE, COUNSEL, THIS WAS ENTERED AS P 13 FROM YESTERDAY?

MR. RIENZI: I BELIEVE SO.

MR. FIELD: THANK YOU.

BY MR. FIELD:

Q. I WILL REPRESENT IT IS EXHIBIT P 13. IT'S A LETTER DATED MAY 7TH TO MARK RIENZI, COUNSEL HERE, FROM VALERIE ROBINSON, CHAIR OF CORPORATE AND TAX GROUP. IS MS. ROBINSON ONE OF YOUR COUNSEL WITH THE CITY?

A. YES.

Q. AND WERE YOU CONSULTED IN AND INVOLVED IN THIS LETTER?

A. YES. THE LAW DEPARTMENT PREPARED THIS LETTER.

Q. YES. THANK YOU. IF YOU CAN TURN BACK TO THE SECOND PAGE THAT MR. RIENZI HAD YOU READING FROM.

A. THE SECOND OR THE THIRD?

Q. THIRD PAGE, EXCUSE ME.

A. JUST MAKING SURE.

Q. THERE ARE NO NUMBERS ON THIS ONE. AND THE PARAGRAPH THAT IS FROM THE -- THE FOURTH FROM THE BOTTOM THAT STARTS: FAMILY EQUALITY IS BOTH A LEGAL

REQUIREMENT AND AN IMPORTANT CITY POLICY AND VALUE THAT MUST BE EMBODIED IN OUR CONTRACTUAL RELATIONSHIPS.

A. UM-HUM.

Q. CAN YOU READ ME WHAT IT SAYS, THE LAST PORTION OF THAT PARAGRAPH THAT STARTS "ON A RELATED NOTE."

A. ON A RELATED NOTE, CONTRARY TO THE DISCUSSION IN YOUR LETTER REGARDING DHS'S PRACTICES CONCERNING SIBLINGS, BECAUSE THE BEST INTERESTS OF THE CHILDREN IN OUR CARE ARE PARAMOUNT, WE DID RECENTLY GRANT AN EXCEPTION TO CESSATION OF CSS'S REFERRALS IN THAT INSTANCE TO ASSURE THAT SIBLINGS WERE PLACED TOGETHER, AND WE EXPECT THE BEST INTEREST OF CHILDREN WILL REMAIN PARAMOUNT THROUGHOUT ANY TRANSITION.

Q. AS DHS COMMISSIONER IN ALL OF THE COMMUNICATIONS YOU ARE INVOLVED IN AND RESPONSIBLE FOR, DO YOU HAVE ANY REASON TO THINK THERE HAS EVER BEEN ANY LACK OF CLARITY ABOUT YOUR DEPARTMENT'S GRANTING EXCEPTIONS IN THE CASES OF KINSHIP AND SIBLINGS?

A. NO. I THINK WE HAVE BEEN PRETTY CLEAR.

Q. THANK YOU.

JUST ONE LAST ISSUE. EARLIER IN YOUR CROSS-EXAM TESTIMONY YOU MENTIONED HEARING NEW TESTIMONY ON TUESDAY FOR THE -- ABOUT AN ISSUE FOR THE FIRST TIME THAT CAUSED YOU SOME CONCERN. WHAT WAS THAT TESTIMONY?

A. THE TESTIMONY WAS BY JAMES AMATO, WHO INDICATED

THAT THERE HAS TO BE A PASTORAL REFERENCE PROVIDED IN ORDER TO BECOME A FOSTER PARENT WITH CATHOLIC SOCIAL SERVICES.

Q. AND WHAT CONCERN DID THAT CAUSE YOU?

A. IT'S A VERY SPECIFIC CHURCH PRACTICE THAT HAS TO COME FROM A PASTOR OR A RELIGIOUS LEADER AND CLEARLY CREATES ANOTHER BARRIER THAT IS NOT A REQUIREMENT TO BECOME A FOSTER PARENT.

Q. AND DID YOU HEAR MR. AMATO TESTIFY THAT IT DIDN'T -- IT WAS NOT REQUIRED TO ONLY BE A CATHOLIC CHURCH, BUT COULD BE ANY OF A VARIETY OF FORMS OF RELIGIOUS LEADER?

A. I DID, BUT I ALSO HEARD THAT WHAT I INTERPRETED AS EASIEST WOULD PROBABLY HAVE A SIGNIFICANT CHALLENGE BEING ABLE TO BECOME A FOSTER PARENT THROUGH CSS, SINCE THERE WOULD BE NO OPPORTUNITY TO GAIN A PASTORAL REFERENCE.

Q. AND DID THAT CAUSE YOU CONCERN ABOUT THE CITY'S CONTRACTING WITH CATHOLIC SOCIAL SERVICES?

A. IT DOES.

MR. FIELD: THANK YOU. NO FURTHER QUESTIONS, YOUR HONOR.

THE COURT: OKAY. ANY OTHER QUESTIONS?

MR. RIENZI: VERY BRIEFLY.

RECROSS EXAMINATION

BY MR. RIENZI:

Q. MS. FIGUEROA, AS COMMISSIONER OF DHS YOU ARE NOT AWARE OF A SINGLE ACTUAL PERSON WHO HAS SAID THEY WERE UNABLE TO BE CERTIFIED BY CATHOLIC BECAUSE OF A PASTORAL LETTER REQUIREMENT, IS THAT CORRECT?

A. NO, I HAVE NOT. I DIDN'T KNOW UNTIL YESTERDAY.

Q. DID YOU DISCUSS THE MATTER WITH OTHERS? DID YOU DISCUSS THE MATTER WITH OTHERS AT DHS?

A. NO. I WAS NOT ALLOWED TO TALK TO THEM. I WAS UNDER OATH.

Q. YOU HAVE GOT GOOD LAWYERS.

A. I DO.

MR. RIENZI: NOTHING FURTHER, YOUR HONOR.

THE COURT: OKAY. ANY OTHER QUESTIONS?

MR. FIELD: NOT FOR THIS WITNESS, YOUR HONOR.

THE COURT: THANK YOU.

THE WITNESS: THANK YOU, JUDGE.

THE COURT: YOUR NEXT WITNESS.

MS. CORTES: YOUR HONOR, COULD WE ASK FOR LUNCH BRIEFLY.

THE COURT: YOU CAN'T EAT.

MS. CORTES: AT THIS TIME, YOUR HONOR. ALSO TO BE PERFECTLY HONEST, YOUR HONOR, OUR NEXT PROPOSED WITNESS IS NOT CURRENTLY RIGHT HERE. I THINK

WE ASSUMED THAT THERE WAS GOING TO BE A LUNCH BREAK AT THIS TIME. SO I WOULD JUST ASK. I DID ALERT MR. RIENZI OF OUR NEXT WITNESS. I UNDERSTAND THAT HE HAS AN OBJECTION. I DON'T KNOW IF YOUR HONOR WANTS TO ADDRESS THAT NOW OR AFTER LUNCH OR WHATEVER YOUR HONOR'S PREFERENCE IS.

MR. RIENZI: YOUR HONOR, CAN I JUST BRIEFLY STATE. I THINK THERE'S ACTUALLY A GOOD REASON TO HAVE A BRIEF DISCUSSION NOW, IF YOU ARE WILLING.

THE COURT: OKAY.

MR. RIENZI: MY UNDERSTANDING FROM COUNSEL IS THAT THE NEXT WITNESS WILL BE A MR. FRANK CERVONE, WHO IS NOT A WITNESS FOR WHOM THEY SUBMITTED A DECLARATION IN ANY OF THEIR MOVING PAPERS AND WHOM I AM TOLD IS SOMEBODY THAT WISHES TO QUALIFY AS AN EXPERT, SOMEBODY WHO IS NOT DISCLOSED TO US PREVIOUSLY, WHO IS SUPPOSED TO BE AN EXPERT WHO WE DON'T HAVE ANY OF THE EXPERT MATERIALS ON. I THINK IT'S FRANKLY IMPROPER TO GO FORWARD WITH THE WITNESS IN THAT CIRCUMSTANCE. AND SO I WOULD ASK YOUR HONOR IF YOU ARE WILLING TO RULE NOW, I JUST DON'T THINK THEY SHOULD BE INTRODUCING NEW WITNESSES WHO HAVE NOT BEEN PART OF THE PLEADINGS PREVIOUSLY.

MS. CORTES: YOUR HONOR, MR. CERVONE WAS TO BE AN AFFIANT IN THE PROPOSED -- IN THE INTERVENOR'S

PAPERS. HE IS BEING REPRESENTED BY MS. MARY CATHERINE ROPER FOR THE ACLU. SO HE DID HAVE NOTICE. HE IS PART OF THAT -- OF THOSE PAPERS, YOUR HONOR. I DID PROVIDE COUNSEL WITH MR. CERVONE'S RESUME. THERE IS NO REQUIREMENT UNDER THE FEDERAL RULES THAT REQUIRE US TO PROVIDE THEM WITH SUCH NOTICE. WE ALSO DID NOT HAVE A NOTICE OF ALL OF THEIR WITNESSES FOR TODAY, YOUR HONOR. IF COUNSEL WOULD LIKE TO INTERVIEW MR. CERVONE AHEAD OF TIME WITH MS. ROPER PRESENT THERE IS NO ISSUE FOR OUR SIDE OR FOR MS. ROPER.

HIS PROPOSED TESTIMONY WOULD BE VERY RELEVANT TO THESE PROCEEDINGS. HE HAS BEEN A CHILD ADVOCATE IN -- SPECIFICALLY FOR THE CITY AND COUNTY OF PHILADELPHIA FOR THE PAST 40 YEARS. WE HAVE HEARD A LOT OF TESTIMONY -- OR AT LEAST OPPOSING COUNSEL HAS TRIED TO ELICIT A LOT OF TESTIMONY THAT IT'S ONLY ONE SIDE THAT IS GOING TO BE HARMED BY YOUR HONOR NOT GRANTING THIS TRO. MR. CERVONE WOULD PROVIDE YOUR HONOR WITH THE TESTIMONY, THE VERY RELEVANT TESTIMONY FROM HIS EXPERIENCE AS A CHILD ADVOCATE, AS TO WHAT WOULD OCCUR IF YOUR HONOR DOES GRANT THE TRO AND TO THE DEVASTATING EFFECT ON THE CHILDREN AND SPECIFICALLY THE LGBTQ CHILDREN AND ALSO THE LGBTQ SAME-SEX COUPLES AND HIS EXPERIENCE WITHIN THE FOSTER SYSTEM AS A CHILD ADVOCATE.

AND EVEN IF YOUR HONOR DOES NOT QUALIFY

HIM AS AN EXPERT, I WOULD PROPOSE TO YOUR HONOR THAT HE WOULD STILL BE ALLOWED TO PROVIDE OPINION TESTIMONY ON THAT FRONT. AND AGAIN, WE WOULD ALLOW MR. RIENZI AND HIS ENTIRE TEAM TO QUESTION HIM AHEAD OF TIME AND EVEN TO CONTINUE THE VOIR DIRE IN OPEN COURT BEFORE YOUR HONOR UNTIL YOUR HONOR IS SATISFIED THAT HE IS AN ACTUAL EXPERT IN THIS FIELD.

MR. RIENZI: YOUR HONOR, I SIMPLY SAY THAT THE TIME FOR INTRODUCING MR. CERVONE'S TESTIMONY WOULD HAVE BEEN WHEN THEY PRESENTED THEIR ARGUMENTS, THEIR LEGAL ARGUMENTS IN THEIR BRIEFS. AND INTRODUCING THE IDEA OF AN EXPERT TESTIFYING IN THE MIDDLE OF THE DAY TODAY AND PROPOSING THAT I TAKE HIS DEPOSITION OVER LUNCH SEEMS LIKE AN UNFAIR PRACTICE AND EXCEEDINGLY DIFFICULT FOR ANYBODY TO DO. YOU WILL HAVE A CHANCE TO HEAR FROM MR. CERVONE ONCE YOU DECIDE WHETHER OR NOT HE SHOULD BE ABLE TO INTERVENE. HE IS ONE OF THE COUNCIL OF INTERVENORS, APPARENTLY.

SO THAT MOTION IS BEFORE YOUR HONOR. OUR OPPOSITION IS DUE NEXT WEEK. YOU HAVE ACCEPTED THEIR BRIEF -- HIS BRIEF AND HIS WRITINGS AS AN AMICUS ALREADY. I REALLY DO NOT THINK IT'S FAIR TO GO DOWN THIS PATH.

MS. CORTES: YOUR HONOR, MR. RIENZI CAN ADDRESS THAT PART AS TO -- IT'S MY UNDERSTANDING MR.

CERVONE CAN CLARIFY FOR YOUR HONOR THAT HE WILL ACTUALLY WITHDRAW AS COUNSEL, GIVEN THAT HE WOULD BE ALLOWED TO TESTIFY TODAY AS A WITNESS. SO HE WOULD WITHDRAW AS COUNSEL AND MS. ROPER WOULD CONTINUE ALONG WITH THE REPRESENTATION.

IS THAT CORRECT, MS. ROPER?

MS. ROPER: THAT IS CORRECT, YOUR HONOR. AND OBVIOUSLY AS WE HAVE BEEN PARTICIPATING AS INTERVENORS, WE MIGHT WELL HAVE CALLED HIM OR SOMEONE SIMILAR TO TESTIFY. BUT SINCE WE ARE NOT HERE TO DO THAT, I THINK THE CITY WANTED TO DO THAT. AGAIN, THIS IS NOT OUR FIGHT. I JUST AM HERE TO CLEAR UP ANY QUESTIONS ABOUT HIS RELATIONSHIP WITH RESPECT TO THE INTERVENORS.

MS. CORTES: AND YOUR HONOR, TO MR. RIENZI'S POINT AS NOT BEING ABLE TO DEPOSE HIM, WE ARE ON YOUR HONOR'S TRO SCHEDULE. THEY ARE THE ONES THAT HAVE FILED THE TRO/PRELIMINARY INJUNCTION. SO WE ARE ALL ON AN EXPEDITED SCHEDULE. WE WOULD HAVE ALL LOVED TO HAVE HAD THE TIME TO DEPOSE ALL OF THEIR WITNESSES, BUT WE ARE ALL UNDER THIS SCHEDULE. SO NONE OF US WERE ABLE TO DO THAT.

THE COURT: OKAY. I AM GOING TO PERMIT THE WITNESS TO TESTIFY. I AM GOING TO RECESS UNTIL 1:30. AND IF YOU CALL HIM AND HAVE HIM REPORT BACK, SO

THAT HE COULD BE MADE AVAILABLE TO COUNSEL SO THAT WE CAN PROCEED AT 1:30.

MS. CORTES: YOUR HONOR, HE HAD A MEETING WITH HIS STAFF STARTING AT 12:30. HE BELIEVED IT WOULD LAST A HALF HOUR. I HAVE ASKED HIM TO RETURN TO COURT AS QUICKLY AS HE POSSIBLY CAN SO HE WILL BE AVAILABLE TO COUNSEL FOR THE PLAINTIFFS.

THE COURT: VERY WELL. OKAY. WE WILL RECESS UNTIL 1:30.

ALL COUNSEL: THANK YOU, YOUR HONOR.

(ALL RISE.)

(LUNCH BREAK TAKEN.)

THE COURT: GOOD AFTERNOON. YOU MAY BE SEATED. ARE WE READY TO PROCEED?

MS. CORTES: YES, YOUR HONOR.

MR. RIENZI: YES, YOUR HONOR.

THE COURT: CALL YOUR WITNESS.

MS. CORTES: DEFENDANTS CALL FRANK CERVONE TO THE STAND.

THE CLERK: PLEASE REMAIN STANDING AND RAISE YOUR RIGHT HAND.

(WITNESS SWORN.)

THE CLERK: CAN YOU STATE AND SPELL YOUR NAME FOR THE RECORD, PLEASE?

THE WITNESS: FRANK CERVONE, C-E-R-V AS

IN VICTOR, O-N-E.

THE COURT: GOOD AFTERNOON.

THE WITNESS: GOOD AFTERNOON.

MS. CORTES: MAY I PROCEED, YOUR HONOR?

THE COURT: YES.

DIRECT EXAMINATION - QUALIFICATIONS

BY MS. CORTES:

Q. GOOD AFTERNOON, MR. CERVONE. CAN YOU PLEASE TELL HER HONOR WHERE YOU WENT TO SCHOOL?

A. COLLEGE?

Q. YOU CAN START WITH COLLEGE AND YOU CAN WORK YOUR WAY UP.

A. UNIVERSITY OF PENNSYLVANIA FOR UNDERGRAD, VILLANOVA LAW SCHOOL, AND LASALLE UNIVERSITY FOR A MASTER'S DEGREE IN THEOLOGY.

Q. CAN YOU TELL HER HONOR WHAT IS IT THAT YOU DID IMMEDIATELY AFTER LAW SCHOOL?

A. CAREER-WISE?

Q. YES.

A. SO I SERVED FOR A YEAR AS A STAFF ATTORNEY AT DELAWARE COUNTY LEGAL ASSISTANCE ASSOCIATION, A LEGAL AID PROGRAM, WORKING WITH LAW STUDENTS AS AN ADJUNCT CLINICAL PROFESSOR FROM VILLANOVA. I THEN MOVED ON TO SAINT GABRIEL'S SYSTEM, WHICH IS A RESIDENTIAL -- A PROGRAM FOR RESIDENTIAL TREATMENT AND DAY TREATMENT

PROGRAMS FOR DELINQUENT BOYS RUN BY THE CATHOLIC SOCIAL SERVICES, THE ARCHDIOCESE OF PHILADELPHIA, WHERE I WAS A TEACHER AND A LAWYER AND A CHRISTIAN BROTHER, A MEMBER OF THE RELIGIOUS COMMUNITY.

Q. AND THEN JUST GOING BACK TO YOUR EXPERIENCE AS AN ADJUNCT PROFESSOR AT VILLANOVA, CAN YOU TELL HER HONOR EXACTLY WHAT IT IS YOU DID AS AN ADJUNCT PROFESSOR THERE?

A. SO WE RAN A -- THE DELAWARE COUNTY LEGAL ASSISTANCE ESSENTIALLY HAD A CONTRACT OF SOME SORT WITH VILLANOVA LAW SCHOOL. THESE ARE IN SOMEWHAT THE EARLY DAYS OF CLINICAL EDUCATION AND SO THE LAW SCHOOL OUTSOURCED THE ADMINISTRATION OF THEIR CLINICAL PROGRAM TO THIS LEGAL AID OFFICE. AND SO MY JOB WAS TO SUPERVISE LAW STUDENTS IN DOMESTIC VIOLENCE CASES AND CHILD SUPPORT CASES IN STATE COURT IN DELAWARE COUNTY IN MEDIA.

Q. AND THEN YOU MENTIONED WORKING AT SAINT GABRIEL'S?

A. CORRECT.

Q. WHAT IS IT THAT YOU DID AFTER YOUR TIME AT SAINT GABRIEL'S CAREER-WISE?

A. SO I DID -- IN 1989 I LEFT SAINT GABE'S AND WENT BACK TO DELAWARE COUNTY -- DELAWARE COUNTY LEGAL ASSISTANCE IN ESSENTIALLY THE SAME ROLE AS A CLINICAL

INSTRUCTOR FOR A YEAR. AND THEN WAS HIRED AS GENERAL COUNSEL OF THE SUPPORT CENTER FOR CHILD ADVOCATES IN APRIL OF 1990.

Q. AND ARE YOU STILL THERE TODAY?

A. I AM. IN NOVEMBER OF 1992 I WAS ELECTED -- I WAS ELECTED. I WAS SELECTED BY THE BOARD OF DIRECTORS TO BE THE EXECUTIVE DIRECTOR OF CHILD ADVOCATES. AND I HAVE CONTINUED IN THE ROLE OF EXECUTIVE DIRECTOR SINCE NOVEMBER OF '92.

Q. AND THIS MIGHT SEEM LIKE AN OBVIOUS QUESTION, BUT CAN YOU TELL HER HONOR WHAT IT IS -- WHAT DOES IT MEAN TO BE A CHILD ADVOCATE?

A. SO CHILD ADVOCATE IS A TERM OF ART USED ALMOST EXCLUSIVELY IN OUR WORK IN PHILADELPHIA COUNTY. MOST JURISDICTIONS USE THE PHRASE GUARDIAN AD LITEM, AND IT IS ESSENTIALLY TO SERVE AS A LAWYER FOR A CHILD, COURT-APPOINTED LAWYER FOR A CHILD IN A CHILD PROTECTION PROCEEDING, WHICH IN PENNSYLVANIA IS KNOWN AS A DEPENDENCY COURT CASE IN THE JUVENILE COURTS. OUR OFFICE REPRESENTS CHILDREN IN CHILD WELFARE PROCEEDINGS AND RELATED PROCEEDINGS IN PHILADELPHIA'S COURT OF COMMON PLEAS.

Q. AND BEFORE WE GO INTO THE SPECIFICS AS TO WHAT YOU WOULD DO AS A CHILD ADVOCATE, CAN YOU TELL HER HONOR SORT OF WHO ARE THE PLAYERS IN THE DEPENDENCY COURT

SYSTEM IN PHILADELPHIA?

A. A CLASSIC, WE THINK OF A TRIAD OF CHILD, PARENT AND STATE AS THE THREE PARTIES TO A PROCEEDING. AND SO THE CHILD OR SIBLING GROUP IS A PARTY OF INTEREST IN THAT PROCEEDING. THOSE PROCEEDINGS ARE TYPICALLY INITIATED BY A COUNTY CHILDREN AND YOUTH AGENCY. HERE IN PHILADELPHIA IT'S THE DEPARTMENT OF HUMAN SERVICES AND THE DEPARTMENT OF HUMAN SERVICES IS REPRESENTED BY LAWYERS FROM THE CITY LAW DEPARTMENT. AND THEN THERE ARE ONE OR TWO PARENTS IN THE PROCEEDING. THEY TYPICALLY HAVE SEPARATE COUNSEL, AND THUS WE HAVE CHILD, PARENT, STATE AS THE THREE KIND OF MAIN ACTORS OR PARTIES. THERE ARE A VARIETY OF PROVIDER AGENCIES WHO COME BEFORE THE COURT TYPICALLY NOT AS PARTY, BUT IN EITHER A WITNESS ROLE OR OTHERWISE COME TO THE ATTENTION OF THE COURT.

Q. AND WHEN YOU MENTIONED PARENTS, CAN YOU BREAK THAT DOWN, DO YOU MEAN BIOLOGICAL PARENTS, FOSTER PARENTS, CAN YOU JUST PLEASE CLARIFY FOR HER HONOR WHAT YOU MEANT BY PARENTS?

A. SO THE NATURE OF A DEPENDENCY PROCEEDING IS TO INTERVENE WITH REGARD TO THE PARENT/CHILD RELATIONSHIP, THE LEGAL RELATIONSHIP. SO MOSTLY WE ARE TALKING ABOUT BIRTH PARENTS, MOTHERS AND FATHERS. ON OCCASION THERE IS SOME OTHER ADULT CAREGIVER WHO HAS A LEGAL

RELATIONSHIP WITH THE CHILD AND THUS THEY GET STANDING IN THAT DEPENDENCY PROCEEDING, SO THAT COULD BE A GRANDPARENT, IT COULD BE A STRANGER WHO HAS BEEN PROVIDING CARE FOR THE CHILD OR MAYBE WHO HAS BEEN RECOGNIZED BY SOME OTHER COURT AS HAVING CUSTODY. THOSE ARE ALL THE FOLKS THAT HAVE A LEGAL RELATIONSHIP WITH THE CHILD. WELL, OF COURSE, WE ALSO INTERACT WITH CAREGIVERS WHO ARE INTERPOSED BY SOME PROVIDER AGENCY SUCH AS WE HAVE BEEN DISCUSSING HERE FROM A FOSTER CARE AGENCY OR THE LIKE. AND THOSE FOLKS MIGHT BE STRANGERS TO THE CHILD BEFORE THEY COME TO KNOW THE CHILD OR THEY MIGHT BE A RELATIVE OF THE CHILD, WHAT WE CALL KINSHIP RELATIONSHIP.

Q. AND JUST FOR CLARITY, HOW LONG HAVE YOU BEEN A CHILD ADVOCATE?

A. ONE MIGHT SAY SINCE I HAVE BEEN WORKING AT THE SUPPORT CENTER FOR CHILD ADVOCATES SINCE 1990, IN THIS FORMAL SENSE OF GUARDIAN AD LITEM IN COURT CASES. I FEEL LIKE MY OTHER ANSWER TO THAT QUESTION OFTEN IS MY WHOLE LIFE. THIS IS WHAT I FEEL LIKE I -- I AM ABOUT. IT IS BECOME MY PERSONAL MISSION, MY SENSE OF SELF-IDENTITY IS TO BE AN ADVOCATE FOR CHILDREN.

Q. AND IN YOUR PREPARING TO GO TO COURT AND IN YOUR ROLE AS A CHILD ADVOCATE, CAN YOU EXPLAIN TO HER HONOR WHAT IS IT THAT YOU HAVE TO DO TO PREPARE AND MAKE SURE

THAT YOU FULFILL THOSE DUTIES?

A. SO THE MODEL THAT I USE IN MY OWN CASES IS THE MODEL OF OUR OFFICE, WHAT WE THINK OF AS A SERVICE MODEL. AND WE THINK OF OUR TASK AS TO REPRESENT THE WHOLE CHILD. A CHILD IS REFERRED TO ME AND MY -- I DON'T HAVE AN INDIVIDUAL LAW PRACTICE OUTSIDE OF THE OFFICE. SO WHEN I USE "WE," I'M TALKING ABOUT BOTH MY OWN PRACTICE AND THAT OF MY COLLEAGUES WHO ARE IN OUR OFFICE. SO OUR PRACTICE INVOLVES RESPONDING TO THE PRESENTING PROBLEM THAT BROUGHT A CHILD TO THE ATTENTION OF OUR OFFICE AND TO THE ATTENTION OF THE COURTS. THAT PRESENTING PROBLEM MIGHT, FOR EXAMPLE, BE AN INCIDENT OF CHILD SEXUAL ABUSE OR PHYSICAL ABUSE OR SEVERE NEGLECT, WHICH INCIDENT WAS THEN BROUGHT TO THE COURT, FOR EXAMPLE, BY THE DEPARTMENT OF HUMAN SERVICES IN A PETITION. THAT CASE IS ESSENTIALLY PETITIONED TO COURT AND WE ARE APPOINTED BY THE COURT TO SERVE AS COUNSEL AND GUARDIAN AD LITEM FOR THE CHILD.

WE WORK HARD TO UNDERSTAND THE EVENTS, BACKGROUND RELATED TO THE PRESENTING PROBLEM. AND THEN AS WELL TO UNDERSTAND THE -- ALL OF THE COLLATERAL ISSUES THAT MIGHT BE INVOLVED IN A CHILD'S LIFE. ONE MIGHT THINK, FOR EXAMPLE, IN A CHILD SEX ABUSE CASE THAT THAT CHILD NEEDS THERAPY AND NEEDS ACCESS TO THERAPY, NEEDS TRANSPORTATION TO THE THERAPIST, NEEDS A REPORT

FROM THE THERAPIST. WE NEED TO KNOW WHETHER SHE IS MAKING PROGRESS. SHE NEEDS TO BE IN SCHOOL. SHE NEEDS TO BE IN THE RIGHT SCHOOL. AND SO WE ARE GOING TO ENGAGE HER SCHOOL COMMUNITY, COUNSELORS MOSTLY.

IN THE MAIN WE ARE GOING TO INTERACT WITH THE CASE MANAGERS ON THE CASE. HERE IN PHILADELPHIA THEY WORK FOR CUA'S, COMMUNITY UMBRELLA AGENCIES, WE INTERACT WITH THE CUA WORKER ON THE CASE. WE MIGHT WORK WITH SOME OF THE PARTS OF PHILADELPHIA DHS THAT WE HAVE HEARD ABOUT OVER THE PAST FEW DAYS, LIKE THE CENTRAL REFERRAL UNIT, CONTRACT ADMINISTRATION, THE COMMISSIONER'S OFFICE OR OTHERWISE TO DEAL WITH PROBLEMS THAT EMERGE WITH REGARD TO THAT CHILD.

Q. CAN YOU TELL HER HONOR HOW -- THIS MIGHT BE DIFFICULT, BUT CAN YOU ESTIMATE FOR HER HONOR ABOUT HOW MANY CHILDREN YOU HAVE SERVED AS A CHILD ADVOCATE FOR IN YOUR -- AS YOUR TIME -- DURING YOUR TENURE?

A. SO I DON'T HAVE AN INDIVIDUAL PRACTICE -- I'M SORRY, CASELOAD THESE DAYS. FOR MANY YEARS OF MY SERVICE AS DIRECTOR I ACTUALLY HAD A SUBSET OF KIDS WHO WERE ASSIGNED TO ME IN THE MAIN. NOW I SERVE AS ONE OF THE ROTATING STAFF ATTORNEYS THAT COVER CASES. ANY TIME YOU ARE IN COURT ON BEHALF OF A CHILD, YOU ARE REPRESENTING THAT CHILD. OUR OFFICE IS APPOINTED TO REPRESENT THE CHILD, NOT INDIVIDUAL ATTORNEYS. SO I AM

NOT PERSONALLY APPOINTED TO REPRESENT VERY MANY KIDS. YOU KNOW, IT HAPPENS, IN DISCRETE MOMENTS.

THE AGENCY REPRESENTS THESE DAYS ABOUT 1,100 KIDS A YEAR. SO IN ONE SENSE I FEEL RESPONSIBLE AND AS REPRESENTATIVE I REPRESENT ALL 1,100 OF THOSE KIDS. I CERTAINLY DON'T KNOW THEM ALL. I WAS IN COURT YESTERDAY AND HAD THREE KIDS WHO I REPRESENTED, TWO WHO WERE ADOPTED AND ONE WHO IS IN FOSTER CARE. ON FRIDAY I HAD SEVEN KIDS WHO I REPRESENTED IN FOUR PROCEEDINGS. SO I WOULD SAY THAT I HAVE PERSONALLY ENGAGED PROBABLY SEVERAL THOUSAND CHILDREN, EITHER INDIVIDUAL REPRESENTATION OVER MY CAREER, AND CERTAINLY HALF OF THE AGENCY I BELIEVE OUR NUMBER IS SOMEWHERE IN THE ORDER OF 8,000 KIDS DURING MY TIME. VERY ROUGH ESTIMATE.

Q. AND I GUESS IN BOTH YOUR PERSONAL AND AS REPRESENTATIVE OF YOUR -- OF THIS SUPPORT CENTER FOR CHILD ADVOCATES, CAN YOU TELL HER HONOR ABOUT HOW MANY OF THESE CHILDREN HAVE SELF-IDENTIFIED AS LGBTQ YOUTH?

A. FOR THE LAST ABOUT TEN YEARS WE HAVE MAINTAINED A SPECIALTY PRACTICE IN WHICH WE ASSIGN DESIGNATED STAFF TO WORK WITH YOUTH WHO HAVE SELF-IDENTIFIED. AND SO ALONG THE WAY WE HAVE HAD OCCASION TO KEEP COUNT AT LEAST OF THOSE WHO HAVE IDENTIFIED -- SELF-IDENTIFIED. AND THAT NUMBER WE THINK IS SOMEWHERE BETWEEN 25 AND 50 CHILDREN A YEAR WHO HAVE EXPLICITLY SELF-IDENTIFIED.

CERTAINLY THERE ARE SOME NUMBER OF ADDITIONAL YOUTH -- PARDON ME -- WHO HAVE NOT YET COME OUT TO THEMSELVES OR TO US OR TO OTHERS. AND, YOU KNOW, ONE MIGHT IMAGINE THERE MAY BE ANOTHER SEVERAL DOZEN CHILDREN ON OUR CASELOAD AT ANY ONE MOMENT WHO ARE QUESTIONING THEIR IDENTITY.

MR. RIENZI: OBJECTION, MOVE TO STRIKE AS SPECULATION.

THE COURT: OVERRULED.

BY MS. CORTES:

Q. AND MR. CERVONE, YOU SAID YOU DESIGNATE STAFF SPECIFICALLY FOR THESE YOUTHS. WHY IS THAT?

A. OUR SERVICE MODEL INCLUDES ASSIGNMENT OF EACH CHILD TO A STAFF MEMBER AS RESPONSIBLE FOR THAT CASE. AND OUR SERVICE MODEL WE HAVE NOT MENTIONED INCLUDES WORKING WITH VOLUNTEER LAWYERS FROM THE LEGAL COMMUNITY. WE THINK OF OURSELVES AS THE VOLUNTEER LEGAL SERVICE FOR ABUSED AND NEGLECTED CHILDREN. SO THAT WHEN A LAWYER FROM THE COMMUNITY WANTS TO DO THEIR PRO BONO WORK FOR ABUSED KIDS, THEY COME TO US. SO IN PART IN ORDER TO FACILITATE THAT VOLUNTEER MODEL, EACH CHILD IS ASSIGNED TO A CHILD ADVOCATE SOCIAL WORKER, PROBABLY 90 PERCENT OR MORE OF OUR KIDS ARE ASSIGNED TO A CHILD ADVOCATE SOCIAL WORKER. EIGHT TO TEN PERCENT ARE ASSIGNED TO A STAFF ATTORNEY FOR PRIMARY RESPONSIBILITY. AND, YOU

KNOW, THE PURPOSE OF THOSE SEVERAL ASSIGNMENTS IS SO THAT THERE IS A DISCRETE CASE MANAGER WHO KNOWS ABOUT THE CASE AND WHO HAS -- IS ESSENTIALLY THE COLLECTOR OF KNOWLEDGE AND DOCUMENTS AND THE PROTAGONIST FOR PURPOSES OF ADVOCACY.

Q. NOW, I JUST WANT TO GO BACK TO YOUR GENERAL EXPERIENCE IN CHILD ADVOCACY. HAVE YOU WRITTEN OR PUBLISHED ANY ARTICLES REGARDING CHILD ADVOCACY?

A. I'VE PUBLISHED PROBABLY DOZEN OF PIECES, LAW REVIEW ARTICLES, OP-EDS, NEWSLETTER PIECES, ARTICLES IN PROFESSIONAL PUBLICATIONS, THE ABA LITIGATION MAGAZINE -- I'M SORRY, WHATEVER THEIR PROFESSIONAL JOURNAL IS, THE SECTION ON LITIGATION OF THE ABA. SO I DO A LOT OF WRITING, PROBABLY PUBLISH THREE OR FOUR OR FIVE PIECES A YEAR FOR, IN A SENSE, GENERAL CIRCULATION.

Q. AND BESIDES YOUR REGULAR SUPPORT TESTIMONY, HAVE YOU BEEN ASKED TO TESTIFY REGARDING MATTERS OF CHILD ADVOCACY?

MR. RIENZI: OBJECTION, JUST GET CLARITY IF YOU ARE TALKING ABOUT THIS CASE OR --

MS. CORTES: I WILL REPHRASE, YOUR HONOR.

THE COURT: YES.

BY MS. CORTES:

Q. MR. CERVONE, HAVE YOU BEEN ASKED TO TESTIFY REGARDING CHILD ADVOCACY BESIDES IN THIS PARTICULAR

CASE?

A. YES. SO TUESDAY MORNING I TESTIFIED BEFORE THE GENERAL ASSEMBLY -- PENNSYLVANIA GENERAL ASSEMBLY HOUSE, CHILD AND YOUTH COMMITTEE IN SUPPORT OF THE CREATION OF THE OFFICE OF THE CHILDREN'S ADVOCATE, ESSENTIALLY AN OMBUDSMAN FUNCTION. THAT'S THE THIRD TIME I HAVE TESTIFIED ON THAT SUBJECT IN THE LAST 15 YEARS. IN JULY OF LAST YEAR, JULY OF '17, I TESTIFIED BEFORE THE INTERBRANCH COMMISSION. I PREVIOUSLY THOUGHT IT WAS THE INTERRELATIONS COMMISSION BUT IT WAS THE PENNSYLVANIA INTERBRANCH COMMISSION ON GENDER AND RACIAL BIAS ON THE SUBJECT OF THE EXPERIENCE OF LGBT YOUTH IN THE CHILD WELFARE SYSTEM.

Q. AND LET ME JUST STOP YOU RIGHT THERE. CAN YOU TELL HER HONOR WHAT YOU TESTIFIED TO? CAN YOU TELL US MORE ABOUT THE SUBJECT OF THAT TESTIMONY?

A. THE SUBJECT OF THAT TESTIMONY?

Q. YES.

A. OF THAT EVENT?

Q. YES.

A. YEAH. SO OUR OFFICE WAS INVITED TO SPEAK TO THE INTERBRANCH COMMISSION ON THIS QUESTION OF THE EXPERIENCE OF GAY AND LESBIAN YOUTH IN THE CHILD WELFARE SYSTEM AND HOW THE SYSTEMS MIGHT SERVE THOSE CHILDREN BETTER, AND SO --

Q. I'M SORRY TO INTERRUPT. WHEN YOU SAY THE SYSTEMS, CAN YOU PLEASE EXPLAIN TO HER HONOR WHAT EXACTLY IS MEANT BY THAT?

A. YES. SO THE INTERBRANCH COMMISSION, AS I UNDERSTAND IT, IS A KIND OF JOINTLY-CREATED, ESSENTIALLY RESEARCH ARM TO MAKE RECOMMENDATIONS TO THE SEVERAL BRANCHES OF STATE GOVERNMENT. AND SO IT IS SOMEHOW COMMISSIONED BY BOTH RESOLUTION OF THE GENERAL ASSEMBLY, THE LEGISLATURE, AND APPOINTMENT FROM THE PENNSYLVANIA SUPREME COURT. TO BE HONEST, I DON'T KNOW IF THE EXECUTIVE BRANCH HAS ANY APPOINTMENTS IN THE INTERBRANCH, YOU KNOW, STRUCTURE.

Q. AND CAN YOU TELL BEFORE -- I'M SORRY, BEFORE I INTERRUPTED YOU TO EXPLAIN WHAT THE SYSTEMS WERE, COULD YOU TELL HER HONOR WHAT IS IT -- MORE SPECIFICALLY WHAT IT IS YOU TESTIFIED REGARDING THAT --

MR. RIENZI: OBJECTION, HEARSAY.

THE COURT: OVERRULED.

THE WITNESS: THE MEMBERS INVITED US TO SPEAK ABOUT IT AND WHAT WE SPOKE ABOUT. I WENT WITH A COLLEAGUE, A SPECIALIST, A WOMAN WHO -- A MASTER SOCIAL WORKER WHO HAD RESPONSIBILITY FOR THIS PARTICULAR CASELOAD FOR THE LAST FIVE YEARS. AND WE SHARED -- IN PART WE SHARED THE STORIES AND EXPERIENCE OF ESSENTIALLY DISCRIMINATION, ABUSE, OPPRESSION AND BULLYING THAT MANY

OF OUR CLIENTS HAVE EXPERIENCED DURING THEIR TIME EITHER IN FOSTER CARE OR IN RESIDENTIAL PROGRAMS OR WITH THEIR BIRTH FAMILIES. SO WE TALK ABOUT, IN A SENSE, THE EXPERIENCE OF THEIR PROBLEMS. AS WELL WE TALK ABOUT IN A SENSE, SOLUTIONS.

SO WE SPEND SOME TIME ACTUALLY TEACHING ABOUT, IN A SENSE, LANGUAGE THAT MIGHT BE MORE APPROPRIATELY USED TO ADDRESS ISSUES OF TRANSGENDER IDENTITY. YOU KNOW, THE KIND OF RESPECT THAT HAS COME TO EMERGE IN THE PUBLIC ARENA THESE DAYS AROUND SELECTED OR PREFERRED PRONOUNS, PERSONS OF TRANSGENDER OR BI-RACIAL IDENTITY -- I'M SORRY, BI-SEXUAL IDENTITY, OCCASIONALLY HAVE A DESIRE TO NOT BE KNOWN IN THOSE BINARY "HE" "SHE" TERMS. SO WE EXPLORED SOME OF THAT. THIS IS A NEW AREA FOR MOST PEOPLE AND IT WAS A NEW TURF FOR THIS BODY AND THEY INVITED US TO SHARE WHAT WE KNOW FROM THE EXPERIENCE OF KIDS AND WHAT WE HAVE SEEN THERE.

Q. AND WHAT WERE SOME OF THE EXAMPLES OF THE DISCRIMINATION THAT YOU TESTIFIED TO REGARDING THE CHILDREN?

MR. RIENZI: OBJECTION, HEARSAY.

THE COURT: OVERRULED.

THE WITNESS: SO ONE SCENARIO THAT I RECALL IN A WAY IS TYPICAL OF THE EXPERIENCE OF KIDS IS A YOUNG MAN, AND I THINK HE IDENTIFIES HIMSELF AS MALE,

WHO WAS IN CARE BECAUSE HE HAD BEEN HARASSED BY HIS OWN BIRTH FAMILY ABOUT HIS EMERGING SEXUAL IDENTITY. I DON'T RECALL IF THERE WAS PHYSICAL ABUSE IN THAT CASE. BUT IT WOULD NOT BE UNCOMMON FOR GAY KIDS TO BE BOTH PHYSICALLY AND EMOTIONALLY ABUSED IN THEIR FAMILY OF ORIGIN. IT'S ONE OF THE REASONS IN GENERAL THAT GAY KIDS COME INTO CHILD WELFARE FOR PROTECTION, BECAUSE THEY ARE NOT WELCOME AT HOME.

MR. RIENZI: OBJECTION, YOUR HONOR. COUNSEL HAS YET PROFFERED THE WITNESS AS AN EXPERT. I DON'T KNOW IF WE ARE THERE YET, BUT IT SURE SEEMS LIKE THE WITNESS IS VENTURING INTO GENERALITIES AS OPPOSED TO ANY FACT TESTIMONY.

THE COURT: DO YOU HAVE QUESTIONS IN REGARD TO HIS QUALIFICATIONS?

MR. RIENZI: ABSOLUTELY, YOUR HONOR.

THE COURT: DO YOU HAVE ANY OTHER QUESTIONS IN REGARD TO HIS QUALIFICATIONS?

MS. CORTES: IN REGARDS TO HIS QUALIFICATIONS, NO, YOUR HONOR.

MR. RIENZI: MAY I ASK, YOUR HONOR, WHAT THE TOPIC IS HE IS BEING PROFFERED AS AN EXPERT ON?

MS. CORTES: YOUR HONOR, I THINK AS MR. CERVONE HAS TESTIFIED THUS FAR, HE IS BEING PROFFERED AS AN EXPERT REGARDING CHILD ADVOCACY -- WELL, MORE

SPECIFICALLY THE PROBLEMS FACED BY CHILDREN WITHIN THE FOSTER CARE SYSTEM, AND IN PARTICULAR THE LGBTQ YOUTH, AND ALSO AS TO HIS CONCLUSIONS AND OBSERVATIONS AS TO THE IMPORTANCE OF A SAFE FOSTER CARE SYSTEM FOR THAT LGBTQ YOUTH.

THE COURT: OKAY. YOU CAN ASK QUESTIONS, COUNSEL.

MR. RIENZI: THANK YOU, YOUR HONOR.

CROSS-EXAMINATION - QUALIFICATIONS

BY MR. RIENZI:

Q. MR. CERVONE, YOU'RE AN ATTORNEY?

A. YES.

Q. YOU'RE AN ATTORNEY IN THIS CASE?

A. NOT ANY LONGER.

Q. THAT'S NOT TRUE, IS IT? YOU HAVE NOT WITHDRAWN FROM THE CASE, HAVE YOU?

A. WELL, IN POINT OF FACT I HAVE NOT ENTERED MY APPEARANCE IN THE CASE IN LARGE PART BECAUSE I HAVE NOT FIGURED OUT HOW TO DO SO IN THE FEDERAL FILING SYSTEM. I AM ON THE PAPERS AND WE ANTICIPATE MY COUNSEL WITHDRAWING ME FROM THOSE PAPERS.

Q. BUT YOU HAVE NOT WITHDRAWN YET, CORRECT?

A. LIKE I SAID, I HAVE NOT ENTERED MYSELF, BUT WE HAVE NOT EFFECTIVELY WITHDRAWN.

Q. YOU HAVE PARTICIPATED AS AN ADVOCATE IN THESE

PROCEEDINGS, HAVE YOU NOT?

MS. CORTES: OBJECTION.

THE COURT: OVERRULED.

BY MR. RIENZI:

Q. YOU HAVE PARTICIPATED AS AN ADVOCATE IN THESE PROCEEDINGS, HAVE YOU NOT?

A. I AM NOT SURE I HAVE.

Q. YOUR NAME IS ON A BRIEF, SIR, IS IT NOT?

A. YES.

Q. THAT'S -- YOU ARE A LAWYER, YOU UNDERSTAND THAT TO BE PARTICIPATING AS AN ADVOCATE, CORRECT?

A. IN THAT SENSE, SURE.

Q. AND THAT BRIEF HAS BEEN ACCEPTED BY THE COURT AS AN AMICUS BRIEF, CORRECT?

A. YES.

Q. AND THERE'S A PENDING MOTION WITH YOUR NAME ON IT FOR PARTICIPATION VIA INTERVENTION, IS THAT CORRECT?

A. YES.

Q. AND THE MOTION IS ON BEHALF OF CHILD ADVOCATES, WHICH IS THE ORGANIZATION YOU ARE THE EXECUTIVE DIRECTOR OF, CORRECT?

A. CORRECT.

Q. HAVE YOU EVER PARTICIPATED AS A TESTIFYING WITNESS IN ANOTHER CASE IN WHICH YOU HAVE BEEN AN ADVOCATE?

A. YES, ACTUALLY LAST MONTH.
Q. WHERE WAS THAT?
A. THAT WAS IN THE COURT OF COMMON PLEAS IN PHILADELPHIA COUNTY.
Q. DID YOU PARTICIPATE AS AN EXPERT WITNESS?
A. NO.
Q. I HEARD THE DESCRIPTION FROM -- COUNSEL FOR THE CITY IS NOT YOUR LAWYER, CORRECT?
A. CORRECT.
Q. I HEARD THE DESCRIPTION FROM COUNSEL FOR THE CITY ABOUT THE TOPIC ON WHICH YOU ARE AN EXPERT AND I WANT TO MAKE SURE I UNDERSTAND IT. SO YOU ARE BEING PROFFERED AS AN EXPERT ON CHILDREN AND THE IMPACT ON LGBTQ YOUTH IN THE FOSTER CARE SYSTEM, IS THAT CORRECT?
A. WELL, IT'S THEIR PROFFER. YOU KNOW, I KNOW WHAT I KNOW. I AM NOT SURE. TO BE HONEST, I DON'T THINK I CAN COMMENT ON HOW THEY ARE PROFFERING ME.
Q. YOUR EXPERTISE IS WORKING WITH CHILDREN, CORRECT?
A. REPRESENTING CHILDREN, WORKING WITH CHILDREN, YES.
Q. YOUR EXPERTISE IS NOT REPRESENTING AND WORKING WITH PARENTS, CORRECT?
A. I CERTAINLY HAVE A LOT OF EXPERIENCE IN REPRESENTING PARENTS. I HAVE REPRESENTED PARENTS. LIKE

I SAID, I TAUGHT SOME PEOPLE HOW TO REPRESENT ADULTS. I HAVE ON MORE THAN A FEW OCCASIONS REPRESENTED BOTH PARENTS AND ADULTS IN A VARIETY OF COURT PROCEEDINGS IN MY CAREER, YOU KNOW, MOSTLY AS COMES ABOUT AS -- ON BEHALF OF FORMER CLIENTS, FORMER CLIENT CHILDREN OF OURS WHO HAVE GROWN UP AND THEY HAVE SOMETHING ELSE IN THEIR LIFE.

Q. SURE. WE HAD A MEETING IN A ROOM RIGHT OUTSIDE BEFORE THIS, SIR?

A. YES.

Q. AND YOU RECALL IN THAT MEETING YOU TOLD ME THAT YOUR EXPERTISE IS IN DEALING WITH THE CHILDREN'S SIDE OF IT, NOT THE PARENT SIDE OF IT. DO YOU RECALL TELLING ME THAT?

A. SO I DON'T THINK I WOULD HAVE PUT IT THAT WAY. FORGIVE ME, I DON'T AGAIN MEAN TO AVOID YOU. WE ARE CHILDREN'S LAWYERS, I AM A CHILDREN'S LAWYER. AS AN OFFICE, WE ONLY REPRESENT KIDS. BECAUSE I HAVE A LAW LICENSE AND BECAUSE I AM THE BOSS, I GET TO REPRESENT WHO I WANT. AND SO I TRY TO RESPECT THE BOUNDARIES THAT WE HAVE ALL AGREED TO AS AN OFFICE, BUT ON OCCASION I ENTER MY APPEARANCE IN SOME WAY OR OTHER ON BEHALF OF ADULTS.

Q. YOU DON'T CONSIDER YOURSELF AN EXPERT IN THE INTEREST OF ADULTS, DO YOU?

MS. CORTES: OBJECTION TO THE RELEVANCE.

THE COURT: OVERRULED.

THE WITNESS: I DO THINK -- I THINK I HAVE SOME EXPERTISE. I TEACH PEOPLE HOW TO REPRESENT ADULTS, SURE.

BY MR. RIENZI:

Q. MORE THAN ANY OTHER LAWYER WHO REPRESENTS ADULTS?

MS. CORTES: OBJECTION.

THE COURT: YES, SUSTAINED.

BY MR. RIENZI:

Q. OTHER THAN SOMETIMES REPRESENTING ADULTS, DO YOU HAVE ANY OTHER CLAIM TO EXPERTISE IN THE INTEREST OF ADULTS?

A. WELL, SO -- YES.

Q. AND WHAT IS THAT?

A. SO THE ADMINISTRATIVE OFFICE OF PENNSYLVANIA COURTS INVITED ME TO CO-LEAD A TRAINING SERIES FOR PARENT AND CHILDREN LAWYERS IN PENNSYLVANIA ACROSS THE STATE, ALONG WITH A COLLEAGUE FROM COMMUNITY LEGAL SERVICES IN PHILADELPHIA. WE ASSEMBLED A FACULTY OF LAWYERS AND JUDGES AND I BELIEVE A SOCIAL WORKER. AND WE CONDUCTED ESSENTIALLY A ROAD SHOW OF TWO FULL DAYS OF CLE TRAINING IN SIX CITIES OVER, YOU KNOW, A SUMMERTIME THREE SUMMERS AGO, I THINK, IN WHICH WE TRAINED PROBABLY

80 PERCENT OF THE LAWYERS WHO SERVE PARENTS AND CHILDREN IN DEPENDENCY PROCEEDINGS.

WE REGULARLY TRAIN -- I AND MY COLLEAGUES REGULARLY TRAIN THE COURT-APPOINTED BAR IN PHILADELPHIA COUNTY WHO REPRESENT PARENTS AND CHILDREN. WE ARE THE DESIGNATED CLE PROVIDER FOR THE FIRST JUDICIAL DISTRICT IN ORDER TO QUALIFY THOSE LAWYERS TO REPRESENT PARENTS IN DEPENDENCY PROCEEDINGS. I HAVE PUBLISHED EXTENSIVELY ON THE -- REALLY THE NATURE AND SCOPE AND DEMANDS OF REPRESENTATION FOR CHILDREN. AND LASTLY, I AM A SCRIVENER OF THE STANDARDS OF PRACTICE FOR LAWYERS WHO REPRESENT CHILDREN AND PARENTS IN DEPENDENCY PROCEEDINGS WHICH STANDARDS HAVE BEEN APPROVED BY THE PENNSYLVANIA STATE CHILDREN CHILD STUDY TEAM.

Q. YOU HAVE A LOT OF EXPERIENCE TRAINING LAWYERS TO REPRESENT BOTH ADULTS AND CHILDREN, IS THAT FAIR?

A. YEAH. WE REALLY FEEL LIKE IT'S ALL OF A PIECE.

Q. DO YOU HAVE ANY EXPERIENCE IN CHILD PSYCHOLOGY?

MS. CORTES: OBJECTION, VAGUE.

BY MR. RIENZI:

Q. DO YOU HAVE ANY TRAINING IN CHILD PSYCHOLOGY?

THE COURT: OVERRULED.

THE WITNESS: SO DURING MY MASTER'S TRAINING, I HAD SEVERAL COURSES RELATED TO FAMILY DYNAMICS. WHILE THEY WERE NOT IN THE PSYCHOLOGY PROGRAM

AT LASALLE UNIVERSITY, THERE WERE, I BELIEVE, ALL OF THOSE COURSES WERE OFFERED IN THE THEOLOGY PROGRAM, BUT THERE WAS A COURSE IN FAMILY DYNAMICS, THERE WAS STUDY OF GENEALOGY AND -- THEY CALL THAT TRANSGENERATIONAL INFLUENCES. I WOULD NOT IN ANY WAY HOLD MYSELF OUT TO BE A PSYCHOLOGIST, AND MY WIFE URGES ME NOT TO TRY TO PRACTICE THERAPY.

Q. WHAT PRINCIPLES AND METHODS DO YOU EXPECT TO BE APPLYING IN YOUR TESTIMONY TODAY?

MS. CORTES: OBJECTION, CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

MR. RIENZI: THE DAUBERT STANDARD UNDER RULE 702 REQUIRES THAT HE BE APPLYING RELIABLE PRINCIPLES AND METHODS. I AM SIMPLY ASKING WHAT THEY ARE.

THE COURT: OVERRULED.

THE WITNESS: SO AS I SAID, I HELP WRITE THE STANDARDS AND PRACTICE FOR THE REPRESENTATION OF CHILDREN. AND I IMAGINE I WOULD REFERENCE WHAT MANY OF US CONSIDER TO BE BEST PRACTICE STANDARDS FOR THE CARE OF CHILDREN, THE REPRESENTATION OF CHILDREN AND SERVICE TO CHILDREN. CERTAINLY AS WELL, MY GENERAL KNOWLEDGE AND TRAINING AS A LAWYER IN THIS FIELD FOR 30 YEARS. YEAH.

Q. ANYTHING ELSE? ANY OTHER PRINCIPLES AND METHODS

YOU EXPECT TO BE APPLYING TODAY?

A. WELL, I AM FAIRLY KNOWLEDGEABLE ABOUT THE CANONS OF ETHICS, THE RULES OF JUVENILE COURT PROCEDURE, THE JUVENILE ACT AND RELATED BODIES OF LAW THAT PERTAIN TO THIS AREA OF PRACTICE. CERTAIN BODIES OF LAW THAT ADDRESS RESPONSIBILITIES RELATED TO DISCRIMINATION OR NONDISCRIMINATION IN PRACTICE. AS WELL, I HAVE BEEN THE ADMINISTRATOR OF A PROGRAM OF REPRESENTATION OF, YOU KNOW, A NONPROFIT AGENCY. AND SO I HAVE SOME BACKGROUND AND EXPERTISE IN NONPROFIT MANAGEMENT. IN, YOU KNOW -- YEAH.

Q. YOU SAID YOU WORKED AS AN ATTORNEY FOR SAINT GABRIEL'S SYSTEM FOR FIVE YEARS, IS THAT CORRECT?

A. CORRECT.

Q. SAINT GABRIEL'S SYSTEM IS PART OF CATHOLIC SOCIAL SERVICES, A PARTY TO THIS CASE, CORRECT?

A. CORRECT.

Q. AND IN FACT, SAINT GABRIEL'S SYSTEM IS ON THE SAME CONTRACT THAT'S AT ISSUE ABOUT FOSTER CARE, CORRECT?

MS. CORTES: YOUR HONOR, I DON'T SEE HOW THIS IS RELEVANT TO THIS VOIR DIRE REGARDING MR. CERVONE.

THE COURT: OVERRULED.

THE WITNESS: I AM NOT AWARE OF THE

CURRENT STATE OF THE CONTRACT.

BY MR. RIENZI:

Q. WHEN YOU WERE AT SAINT GABRIEL'S, DID YOU UNDERSTAND THAT THERE WAS A CONTRACT WITH THE CITY THAT COVERED BOTH SAINT GABRIEL'S AND FOSTER CARE?

A. WELL, MY RECOLLECTION WOULD HAVE BEEN THAT THEY WERE SEPARATE CONTRACTS, BUT IT'S BEEN A LONG TIME.

Q. OKAY.

MR. RIENZI: YOUR HONOR, WE OBJECT TO THE INTRODUCTION OF MR. CERVONE AS AN EXPERT. HIS PARTICIPATION VIOLATES THE WITNESS ADVOCATE RULE. WHETHER HE'D LIKE TO OR NOT, HE IS AN ADVOCATE IN THIS CASE. HE HAS SIGNED PLEADINGS IN THIS CASE, HIS NAME APPEARS ON BRIEFS IN THIS CASE. HE SUBMITTED A DECLARATION THAT SAYS THAT THE ORGANIZATION HE LEADS, CHILD ADVOCATES, HAS AN INTEREST IN THIS CASE. HE IS ALSO A FORMER LAWYER FOR ONE OF THE ORGANIZATIONS THAT IS ON THE CONTRACT. AND ON TOP OF THAT, I DID NOT HEAR ANY DESCRIPTION OF RELIABLE PRINCIPLES AND METHODS. I HEARD A DISCUSSION OF EXPERIENCE THAT HE HAS, BUT DID NOT HEAR RELIABLE PRINCIPLES AND METHODS THAT UNDER RULE 702 AND DAUBERT ARE GOING TO BE APPLIED, SO WE WOULD OBJECT, YOUR HONOR.

THE COURT: YOUR OBJECTION IS OVERRULED.

MR. RIENZI: I ASSUME, YOUR HONOR, I WILL

GET ANOTHER CHANCE TO COME UP AND CROSS-EXAMINE AFTER THE DIRECT EXAMINATION IS COMPLETED.

THE COURT: CROSS-EXAMINE AS TO THE SUBSTANCE OF HIS TESTIMONY.

MR. RIENZI: YES, THANK YOU.

DIRECT EXAMINATION

BY MS. CORTES:

Q. I THINK WHEN WE LAST SPOKE, MR. CERVONE, THAT YOU WERE LETTING HER HONOR KNOW THE BASIS OF YOUR TESTIMONY REGARDING DISCRIMINATION ON THE LGBTQ YOUTH.

A. YES.

Q. I WAS NOT SURE IF YOU HAD CONCLUDED YOUR TESTIMONY ON THAT OR --

A. YOU MEAN PARTICULARLY REGARDING THE PRIOR TESTIMONY?

Q. CORRECT.

A. WELL, IN POINT OF FACT, ONE OF THE REASONS -- YEAH, SO I BELIEVE, AND IT HAS BEEN MY EXPERIENCE, THAT CHILDREN -- LGBT YOUTH COME INTO OUR CHILD WELFARE SYSTEM IN PART BECAUSE HOW THEY ARE TREATED IN THEIR OWN FAMILIES. AND SOMETIMES THEY CONTINUE TO HAVE THOSE BAD EXPERIENCES WHEN THEY ARE IN THE CARE OF FAMILIES WHO THE SYSTEM ENGAGES, RESOURCE PARENTS, CHILD CARE WORKERS, AND OTHERS.

Q. SO BASED ON THAT -- BASED ON THAT OBSERVATION,

HOW IMPORTANT THEN IS IT TO HAVE A FOSTER CARE SYSTEM THAT HAS AFFIRMING VALUES FOR LGBT YOUTH?

A. WELL, I THINK IT'S ABSOLUTELY ESSENTIAL THAT OUR CLIENT CHILDREN FEEL WELCOME AND SUPPORTED IN THEIR PERSON AND IN THEIR IDENTITY, THAT THEY COME TO A SYSTEM FOR REFUGE FROM WHAT IS ESSENTIALLY OPPRESSION, FROM ABUSE AND NEGLECT, OFTEN, AS I SAID, TYPICALLY TARGETED ON THEIR IDENTITY AND IT IS ABSOLUTELY ESSENTIAL THAT THEY FIND IN ALL OF US, IN THE CHILD WELFARE SYSTEM AND ALL OF ITS PRACTITIONERS A PLACE OF JUSTICE, A PLACE OF HEALING AND A PLACE OF SAFETY. AND IN NO UNCERTAIN TERMS THAT MEANS THAT HOMES MUST BE WELCOMING TO THEM. THEY MUST BE AFFIRMING TO THEM, THEY MUST BE PLACES AND PEOPLE AND ORGANIZATIONS THAT SAY YES TO THEIR EXPLORATION OF THEIR OWN IDENTITY. IN A SENSE, IT GOES WITHOUT SAYING THAT THE YOUNG PERSON IS STILL EXPLORING HIMSELF OR HERSELF IN THEIR IDENTITY. THAT'S WHAT WE ARE ALL DOING AS YOUNG PEOPLE, AND IT'S ESSENTIAL THAT THAT YOUNG PERSON HAVE A SAFE PLACE IN WHICH TO DO THAT.

Q. NOW, WERE YOU HERE YESTERDAY -- WELL, IT'S BEEN MULTIPLE DAYS. I MEAN NOBODY WAS HERE YESTERDAY. BUT WERE YOU HERE --

THE COURT: I WAS HERE.

BY MS. CORTES:

Q. WERE YOU HERE, MR. CERVONE, IN COURTROOM 16B A

FEW DAYS AGO WHEN MR. AMATO TESTIFIED?

A. YES.

Q. DID YOU HEAR HIS TESTIMONY REGARDING CSS'S PRACTICES ON SAME-SEX COUPLES?

A. YES.

Q. DID YOU HAVE ANY REACTION TO THAT TESTIMONY?

MR. RIENZI: OBJECTION, VAGUE.

THE COURT: OVERRULED.

THE WITNESS: YEAH, I WAS PRETTY UPSET BY IT.

BY MS. CORTES:

Q. WHY WERE YOU UPSET BY THAT?

A. WELL, YOU KNOW, I HEARD -- I BELIEVE IT WAS HIS REFERENCE TO THEIR MISSION AS WELCOMING ALL AND VALUING ALL. AND THEN HE PROCEEDED TO EXPLAIN HOW SOME PEOPLE ARE NOT WELCOME AND SUPPORTED. IT WAS NEWS TO ME THAT THERE IS A BIT OF A LITMUS TEST FOR QUALIFICATION AS A FOSTER PARENT AND RESOURCE PARENT IN THE CSS SYSTEM. AND THAT FELT TO ME ITSELF CONTRARY TO THE SPIRIT OF THE CHILD WELFARE SYSTEM AS A WHOLE. IT WAS -- I REALLY CRYSTALIZED IN SITTING IN THIS ROOM DURING THAT TESTIMONY THIS NOTION THAT I REFERENCED EARLIER THAT FROM THE PERSPECTIVE OF THE CHILD, THE SYSTEM NEEDS TO BE A WELCOMING SYSTEM. AND I THOUGHT JIM -- I WILL CALL HIM JIM, I HAVE KNOWN HIM FOR A REALLY LONG TIME AND I

LIKE HIM A LOT AS A PERSON. I WAS SURPRISED THAT THE SYSTEM -- THAT THEIR SYSTEM IS SO EXPLICITLY UNWELCOMING OF CERTAIN TYPES OF PEOPLE.

Q. DID YOU HAVE ANY REACTION OR DID YOU HAVE ANY CONCERNS REGARDING WHAT MR. AMATO SAID AS TO ITS EFFECT ON PROSPECTIVE FOSTER PARENTS THAT ARE LGBTQ OR IN A SAME-SEX UNION?

A. YES, I THINK HE IS WRONG. I THINK HE, IF I AM TO CHARACTERIZE IT, I THOUGHT HE STATED, AT LEAST IMPLIED, THAT THEIR PRACTICE WOULD NOT WORK TO DISSUADE PROSPECTIVE RESOURCE PARENTS FROM COMING FORWARD TO SERVE, THAT THEY CLEARLY -- THEY ARE FAIRLY EXPLICIT THAT THEY WOULD DISSUADE THEM FROM COMING TO THEIR AGENCY. HE ALSO OBVIOUSLY WAS RATHER EXPLICIT THAT IF ONE CAME FORWARD, THEY WOULD SEND THAT PERSON OR COUPLE TO SOME OTHER AGENCY, NOT TRY TO TALK THEM OUT OF DOING BUSINESS, TO BE -- FAIR ENOUGH. BUT IN POINT OF FACT, I BELIEVE THAT THIS PRACTICE MAY HAVE THE EFFECT OF DISSUADING PROSPECTIVE RESOURCE FAMILIES FROM SERVING CHILDREN AT ALL. THAT IF PEOPLE BELIEVE THAT THIS IS A SYSTEM THAT IS ALLOWED TO DISCRIMINATE, THEY WILL HAVE A CRISES IN CONFIDENCE ABOUT WORKING IN THE SYSTEM.

I FEEL LIKE IT'S A LOT LIKE WHEN IT IS REVEALED THAT THE SYSTEM IS NOT PERFORMING WELL. AND I AM SOMEBODY WHO SOMETIMES HELPS TO MAKE THOSE HEADLINES

BY REVEALING OR HELPING TO REVEAL WHEN THE SYSTEM IS NOT PERFORMING WELL. AND CERTAINLY I HAVE HEARD THAT FOLKS HAVE HAD A CRISIS OF CONFIDENCE, SHOULD I COME TO WORK HERE, SHOULD I COME TO BE INVOLVED WITH THIS SYSTEM THAT SEEMS SO CHAOTIC. I FEEL LIKE WE HAVE GOTTEN BEYOND THAT IN THE PRESENT ADMINISTRATION OF THE SYSTEM FOR THE LAST BUNCH OF YEARS. BUT I THINK THAT'S THE TYPE OF EFFECT AND MESSAGE THAT IT WILL HAVE TO PROSPECTIVE FOSTER FAMILIES, SAME-SEX FAMILIES, WHO WILL SAY WHY SHOULD I COME TO A SYSTEM THAT TOLERATES THAT FORM OF DISCRIMINATION?

MS. CORTES: YOUR HONOR, I'M JUST GOING TO HAVE A MOMENT. MAY I HAVE A MOMENT TO CONFER WITH COUNSEL?

THE COURT: YES.

(BRIEF PAUSE IN THE PROCEEDING.)

BY MS. CORTES:

Q. MR. CERVONE, YOU TALKED ABOUT THE POTENTIAL IMPACT ON THE LGBTQ YOUTH THAT ARE CURRENTLY IN THE FOSTER SYSTEM. DO YOU HAVE AN OPINION OR DO YOU THINK THIS WILL AFFECT ALL OF THE CHILDREN IN THE FOSTER CARE SYSTEM? "THIS" MEANING CSS'S PRACTICE THAT WE HEARD ABOUT TODAY -- OR NOT TODAY, THROUGHOUT THIS HEARING?

MR. RIENZI: OBJECTION.

THE COURT: DO YOU UNDERSTAND THE

QUESTION?

THE WITNESS: WELL, I THINK THERE ARE LOTS OF POSSIBLE EFFECTS. I'M NOT SURE WHERE YOU WOULD GO WITH IT BUT I THINK THERE ARE EFFECTS ACROSS THE SPECTRUM, FROM MY PERSPECTIVE. SO I THINK I UNDERSTAND THE QUESTION.

THE COURT: OKAY.

MR. RIENZI: OBJECTION.

THE COURT: OVERRULED.

THE WITNESS: SO I THINK THAT THE -- LET'S JUST START WITH THE LOSS OF HOMES THAT JIM AMATO REFERENCED, AND I THINK IT WOULD BE SAD TO LOSE THOSE HOMES, BUT THAT THE SYSTEM WILL SURVIVE, THAT THE NUMBER OF HOMES THAT ARE AT ISSUE LONG-TERM IS -- YOU KNOW, THANKFULLY IT'S NOT 1,000 HOMES AND IT'S BETTER THAN -- OR TEN HOMES THAT MIGHT BE LOST WERE CSS ELECTED TO GET OUT OF THE BUSINESS, AS JIM SUGGESTED. I THINK THE SYSTEM MIGHT GET MANY OF THOSE RESOURCE FAMILIES WILL MIGRATE OVER TO OTHER AGENCIES, SOME WILL NOT. THAT IS WHAT HAS HAPPENED IN EVERY OTHER, IN A SENSE, CLOSURE OF AN AGENCY.

AGENCIES CLOSE FOR A VARIETY OF REASONS. THEY GO OUT OF BUSINESS, THEY MOVE ON AND THE FOSTER PARENTS ARE LEFT TO DECIDE DO THEY STILL WANT TO FOSTER. AND WE HAVE SEEN FOSTER PARENTS WHO ARE WITH AGENCY A

MIGRATE OVER TO AGENCY B. SO I EXPECT THAT THE SYSTEM WILL HANDLE THAT EFFECT. I THINK THE EFFECT ON CHILDREN PRESENTLY IN CARE IS ONE THAT I AM AND OUR OFFICE IS VERY CONCERNED ABOUT. WE HOPE THAT THESE AGENCIES AND THIS COURT DO NOT CAUSE THOSE KIDS TO BE TURNED OUT ON THE STREET ON JUNE 30 WHEN THE CURRENT CONTRACT EXPIRES. THAT WOULD BE VERY UPSETTING.

I THOUGHT JIM WAS PRETTY CLEAR AND NOBLE IN SAYING THAT THEY DON'T INTEND TO TURN ANY OF THOSE KIDS OUT. AT SOME POINT THEY MAY FEEL THAT -- THEY MAY FEEL DIFFERENTLY FROM A BUSINESS PERSPECTIVE, THAT THEY CAN NO LONGER RUN THOSE HOMES OR THEIR AGENCY. SO WE ALL WILL HAVE TO WORK HARD TO MITIGATE THOSE EFFECTS. YOU KNOW, THE EFFECT OF THE CONTINUED PLACEMENT OF KIDS IN HOMES IN AN AGENCY THAT IS ALLOWED TO, IN A SENSE, PUT OUT THIS MESSAGE THAT SAME-SEX COUPLES ARE SOMEHOW NOT TO BE VALUED OR INAPPROPRIATE, WHATEVER WORD YOU WANT TO PUT AS TO THE, IN ESSENCE, THE VALUATION OF THEM.

AS I REFERENCED EARLIER IN THE QUALIFICATIONS SECTION, I THINK WILL GIVE KIDS PRECISELY THE WRONG MESSAGE AND IT WOULD BE AN UPSETTING ONE. THE KIDS WHO COME TO A SYSTEM FOR JUSTICE NOW NEED A SYSTEM THAT FEELS UNJUST. IT FEELS DISCRIMINATORY AND THAT WILL HAVE A BAD -- THAT WILL HAVE A TERRIBLE EFFECT ON

ALL THE KIDS IN THE SYSTEM WHO COME TO UNDERSTAND IT. WE FIND KIDS ARE PRETTY SMART AND THOUGHTFUL AND THEY ASK QUESTIONS LIKE THAT AND I EXPECT THAT THEY WILL HAVE THEIR OWN CRISIS IN CONFIDENCE ABOUT THIS SYSTEM IN CARE.

MS. CORTES: THANK YOU.

CROSS-EXAMINATION

BY MR. RIENZI:

Q. MR. CERVONE, YOU SAID THAT CATHOLIC HAVING TO STOP FOSTER CARE ON JUNE 30TH WOULD BE A BAD THING, IS THAT CORRECT?

A. IT WOULD.

Q. AND YOU SAID THE NUMBER, IT'S GOOD THAT IT'S NOT 1,000, BUT IT'S NOT ZERO EITHER, IS IT?

A. THAT'S CORRECT.

Q. AND YOU SAID SOME WILL TRANSFER BUT YOU KNOW THAT SOME WON'T END UP TRANSFERRING, CORRECT?

A. I IMAGINE SO.

Q. AND FOR SOME NUMBER OF KIDS THEY WILL END UP HAVING TO SWITCH HOMES, POSSIBLY FOSTER PARENTS THEY ARE WITH, CORRECT?

A. WELL, YEAH, I THINK AS YOU HEARD THIS MORNING FROM MS. FIGUEROA, IT'S A DYNAMIC BUSINESS, SO KIDS ARE KIND OF COMING AND GOING FROM THESE HOMES ALL THE TIME. SO, YOU KNOW, IF THEY HAVE 130 -- IF THEY HAVE 120 KIDS

TODAY, A YEAR FROM NOW JUST IN THE ORDINARY COURSE OF THINGS, EASILY HALF OF THOSE KIDS WON'T EVEN BE IN CARE, RIGHT? SO SOME OF THIS -- IT'S JUST THE NATURAL ATTRITION OF KIDS GOING HOME. THE GENERAL PREFERENCE OF THE SYSTEM IS FOR KIDS TO GO HOME. THERE'S A CONSTANT PRESSURE. IT'S IN FEDERAL LAW, IT'S IN STATE LAW, IT'S IN EVERYBODY'S KIND OF AWARENESS OF IT, WE ARE TRYING TO GET THEM AT HOME.

SO YOU SAID WILL SOME BE TURNED ONTO THE STREET OR WILL SOME BE PERHAPS -- LISTEN HERE, WILL SOME HAVE TO GO SOMEWHERE ELSE? I SUPPOSE SO. WHAT THAT NUMBER WILL BE, WE CAN'T KNOW.

Q. BUT TO YOUR MIND, ARE YOU SAYING THAT'S NOT THAT BIG A DEAL?

A. BIG A DEAL FOR EVERY KID EVERY TIME THEY ARE CHANGED, EXCEPT WHEN THE CHANGE IS FOR A GOOD REASON. YOU KNOW, IT'S REFERENCED ALL THE TIME IN THE COURSE OF THE LAST THREE DAYS, IS IT BAD FOR KIDS TO MOVE. WELL, NOT IF THEY ARE IN A BAD HOME, RIGHT? WE START WITH THE PREMISE THAT KIDS ARE REMOVED FROM BAD HOMES. WAS THE MOVE FROM THEIR PARENT, WHO IS ABUSIVE, BAD? WELL, TO THE KID IT MIGHT BE, RIGHT, BECAUSE KIDS, THEY LOVE EVEN THEIR ABUSERS, RIGHT, FOR ALL THOSE REASONS THAT WE KNOW.

Q. YOU HAVE NO REASON TO THINK THAT THE HOMES THEY

WOULD BE MOVED AWAY FROM WHILE THEY ARE CURRENTLY AT CATHOLIC, THAT THOSE ARE BAD HOMES, DO YOU?

A. NO. AS I SAID BEFORE, THE THREE PEOPLE THAT YOU HAD UP HERE ALL SEEM ENTIRELY NOBLE. I CAN'T -- I DON'T THINK ANY OF US COULD ABSTRACTLY OR REMOTELY EVALUATE OR VALUE THE -- IN A SENSE, THE BOND, THE WELL-BEING, HOW THOSE KIDS ARE DOING IN THESE SEVERAL 120 HOMES. WE HAVE TO IMAGINE THAT BECAUSE THEY ARE REGULARLY REVIEWED AND BECAUSE THE COURTS HAVE APPROVED THEM THEY ARE AT LEAST DECENT. BUT I CAN'T TELL IF IT WOULD BE A MAJOR LOSS OR A MINOR ONE FOR THIS OR THAT KID TO LOSE THIS OR THAT FOSTER HOME.

Q. SO THEN DO YOU ALSO THINK COMMISSIONER FIGUEROA WAS WRONG WHEN SHE CLOSED INTAKE OVER CONCERNS ABOUT CHILDREN HAVING TO EVENTUALLY TRANSFER AWAY FROM CATHOLIC?

A. NO.

Q. HER REASON WAS THAT TRANSFERRING WOULD BE BAD. DO YOU RECALL THAT?

MS. CORTES: OBJECTION.

THE COURT: OVERRULED.

THE WITNESS: YOU ASKED ABOUT CLOSING INTAKE, NOT TRANSFER? IT'S NEW KIDS VERSUS CURRENT KIDS?

BY MR. RIENZI:

Q. COMMISSIONER FIGUEROA'S TESTIMONY THIS MORNING, AND I BELIEVE ON TUESDAY, WAS THAT SHE CLOSED INTAKE BECAUSE IT WOULD NOT BE IN THE BEST INTEREST OF THE CHILDREN TO BE PLACED IN HOMES WITH CATHOLIC WHEN THEY MAY EVENTUALLY NEED TO BE TRANSFERRED OUT OF HOMES.

A. OH, YEAH, YEAH. THAT'S RIGHT, I REMEMBER THAT POINT. I THOUGHT IT WAS LAST NIGHT THAT SHE MADE THAT POINT, BUT WHENEVER SHE MADE IT. SO WHAT SHE SAID -- WHAT I CAME AWAY UNDERSTANDING OF THAT POINT, IF I GET THIS RIGHT, IS UNTIL WE SORT OUT THIS PROBLEM, WE OUGHT NOT TO PUT, IN A SENSE -- WE SHOULD NOT HAVE TO PUT MORE CHILDREN INTO THE PROBLEM.

Q. BECAUSE IT IS A PROBLEM IF THEY HAVE TO TRANSFER AWAY WHEN CATHOLIC CLOSES, CORRECT?

A. IT CERTAINLY MIGHT BE A PROBLEM. AS I SAID, EVERY TRANSFER -- YOU KNOW, WE START FROM THE PREMISE IN CHILD WELFARE THAT PERMANENCY AND STABILITY ARE BASELINE PREMISES, SO WE WANT A KID TO REMAIN IN A GOOD PLACE. YOU ARE BUILDING RELATIONSHIPS. YOU WANT THE KID TO HAVE A SENSE THAT WHEN HE LEAVES IN THE MORNING TO GO TO SCHOOL, HE DOES NOT TO HAVE THINK ABOUT THAT HE IS COMING BACK HERE TONIGHT. THAT'S WHAT WE MEAN BY PERMANENCY IN THE SHORT ORDER. SO YEAH, IT'S BAD. WE TRY TO AVOID TRANSFERS.

Q. TERRIFIC, THANK YOU.

YOU SAID BEFORE THAT YOU THOUGHT CATHOLIC'S POLICY MAY HAVE AN EFFECT OF DISSUADING SOME LGBTQ PARENTS FROM ENTERING THE SYSTEM AT ALL. IN OTHER WORDS, NOT JUST WITH CATHOLIC, BUT ELSEWHERE?

A. YES.

Q. IS THAT CORRECT, IS THAT WHAT YOU SAID?

A. YES.

Q. YOU SAID "MAY" BECAUSE YOU DON'T ACTUALLY REALLY KNOW, CORRECT?

A. THAT'S CORRECT.

Q. AND YOU ALSO SAID YOU THINK IT WILL HAVE A TERRIBLE EFFECT ON KIDS IN THE SYSTEM. AND YOU DON'T ACTUALLY KNOW THAT EITHER, DO YOU?

A. WELL, SO I HAVE HAD A BUNCH OF CONVERSATIONS WITH KIDS OVER THE YEARS, YOU KNOW, 15, 20, MAYBE 30, IN WHICH KIDS HAVE TALKED ABOUT -- I HAVE CERTAINLY OBSERVED THEM AS WELL, IN A SENSE, SPEAKING TO LARGE GROUPS IN KIND OF A LECTURE FORMAT. WE SOMETIMES HAVE KIDS TRAIN LAWYERS. WE THINK IT'S -- AND IT WORKS, IT'S JUST A REALLY NEAT DYNAMIC. AND THEY TALK ABOUT THE EXPERIENCE OF BEING DISCRIMINATED AGAINST IN THE CHILD WELFARE SYSTEM. AND WE ASK THEM, WELL, WHAT WAS YOUR EXPERIENCE IN THE CHILD WELFARE SYSTEM? THEY SAY, IT WAS BAD. I WAS DISCRIMINATED AGAINST. SO THEY DON'T THINK ABOUT IT JUST IN TERMS OF THE BAD ACTOR WHO

DISCRIMINATED AGAINST THEM, THEY THINK ABOUT THEIR TIME IN CARE AND THEY THINK ABOUT THE WHOLE SYSTEM. THEY THINK OF IT, IN A SENSE, ALL OF A PIECE. SO THAT'S REALLY WHAT I WAS REFERENCING AND I THINK THEY WILL SEE IT AS BAD.

Q. AND IN THOSE CONVERSATIONS, NONE OF THEM MENTIONED CATHOLIC'S VIEW THAT IT WOULD NOT DO HOME STUDIES FOR LGBTQ COUPLES, CORRECT?

A. THAT'S CORRECT.

Q. I HEARD YOU TO BE SAYING THAT YOUR CONCERN ABOUT THE EFFECT ON KIDS IS THAT THEY WILL KNOW THAT IN THE SYSTEM THERE'S AN ENTITY OR AN ACTOR WHO IS NOT AFFIRMING OF THEIR SEXUAL ORIENTATION, IS THAT ACCURATE? I DON'T WANT TO PUT WORDS IN YOUR MOUTH. I AM JUST TRYING -- THAT'S CORRECT?

A. UM-HUM.

Q. AS LONG AS THE CATHOLIC CHURCH MAINTAINS ITS CURRENT TEACHINGS ON SEXUALITY, WON'T KIDS KNOW THAT JUST BY SEEING THE NAME CATHOLIC?

A. THEY MIGHT.

Q. SO DO YOU THINK CATHOLIC ITSELF NEEDS TO BE OUT OF THE FOSTER CARE BUSINESS ENTIRELY, BASED ON YOUR ARGUMENT?

A. I REALLY HAVE NO OPINION ON THAT. I WOULD LOVE FOR THEM TO STAY IN THE BUSINESS. I WOULD LOVE FOR THEM

TO APPROACH SAME-SEX MARRIAGES DIFFERENTLY.

Q. YOU DISAGREE WITH THE CATHOLIC CHURCH'S RELIGIOUS TEACHINGS ON THAT?

MS. CORTES: OBJECTION TO THE RELEVANCE.

THE COURT: SUSTAINED.

MR. RIENZI: YOUR HONOR, HIS VIEWS ON THE CATHOLIC CHURCH'S TEACHINGS ABOUT SAME-SEX MARRIAGE, WHEN HE IS SAYING HE THINKS CATHOLIC HAS THE WRONG VIEW TO REMAIN IN THE FOSTER SYSTEM.

THE COURT: HE DIDN'T SAY THAT. WHAT HE SAID WAS HE WOULD HOPE THAT THEY WOULD CHANGE THEIR VIEW AND THEY WOULD WELCOME SAME-SEX PARENTS.

BY MR. RIENZI:

Q. IF I CAN JUST PIN THAT DOWN. SO YOU WOULD HOPE THAT THE CATHOLICS CHURCH WOULD CHANGE ITS VIEWS ON SAME-SEX MARRIAGE, CORRECT?

A. I AM NOT ONE TO BELIEVE THAT THE CATHOLIC CHURCH IS A MONOLITH, SO I AM RELUCTANT TO TALK ABOUT THE CATHOLIC CHURCH AND ITS TEACHINGS.

Q. HOW ABOUT THE CATECHISM?

MS. CORTES: OBJECTION.

THE COURT: WELL, NOW WE ARE REALLY GOING FAR AFIELD.

MR. RIENZI: YOUR HONOR, WITH ALL DUE RESPECT --

THE COURT: LET'S JUST GO TO CATHOLIC SOCIAL SERVICES.

BY MR. RIENZI:

Q. DO YOU THINK CATHOLIC SOCIAL SERVICES NEEDS TO CHANGE ITS BELIEFS ON SEXUALITY AND MARRIAGE?

A. I WOULD LOVE FOR THEM TO.

Q. AND YOU TALKED ABOUT KIDS' EXPERIENCE IN HOMES THAT YOU SAID WERE NOT LGBT AFFIRMING, IS THAT FAIR?

A. SAY THAT AGAIN.

Q. IS THAT PART OF YOUR EXPERIENCE THAT YOU WERE TELLING US ABOUT?

A. SAY THAT AGAIN.

Q. EARLIER YOU TESTIFIED ABOUT THE EXPERIENCE OF LGBT KIDS IN HOMES THAT WERE NOT AFFIRMING, CORRECT?

A. YES.

Q. IS IT YOUR VIEW THAT FOSTER PARENTS WHO SUBSCRIBE TO THE TEACHINGS OF THE CATHOLIC CHURCH AND THE CATECHISM ARE UNFIT TO BE FOSTER PARENTS BECAUSE THEY WOULD NOT BE LGBT AFFIRMING?

MS. CORTES: OBJECTION.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. DO YOU THINK THERE ARE RELIGIOUS VIEWS THAT IN YOUR MIND SHOULD DISQUALIFY PEOPLE FROM BEING FOSTER PARENTS?

MS. CORTES: OBJECTION.

THE COURT: SUSTAINED.

BY MR. RIENZI:

Q. YOU SAID YOU WORRIED ABOUT THE MESSAGE IT WOULD SEND TO LGBT KIDS IF CATHOLIC SOCIAL SERVICES WERE PERMITTED TO CONTINUE ACTING ACCORDING TO ITS FAITH. HAVE YOU THOUGHT ABOUT THE IMPACT ON CATHOLIC FOSTER PARENTS AND CATHOLIC KIDS OF THE CITY EXCLUDING CATHOLIC SOCIAL SERVICES FROM FOSTER CARE?

MS. CORTES: OBJECTION, MISCHARACTERIZES HIS TESTIMONY AND IT'S A COMPOUND QUESTION.

THE COURT: YES, BREAK IT DOWN, PLEASE.

BY MR. RIENZI:

Q. YOU TESTIFIED EARLIER ABOUT THE IMPACT THAT ALLOWING CATHOLIC TO CONTINUE WOULD HAVE ON LGBT KIDS, CORRECT?

A. YES.

Q. AND YOUR VIEW IS THAT IF THE CITY ALLOWS CATHOLIC TO CONTINUE OPERATING ACCORDING ITS RELIGIOUS BELIEFS, THAT WOULD BE HARMFUL FOR KIDS, CORRECT?

MS. CORTES: OBJECTION, THAT MISCHARACTERIZES HIS TESTIMONY.

THE COURT: OVERRULED. HE CAN EXPLAIN THAT ANSWER.

THE WITNESS: YES.

BY MR. RIENZI:

Q. AND YOU SAID IT MAY -- TO BE FAIR, I DON'T WANT TO PUT WORDS IN YOUR MOUTH. YOU SAID IT MAY, BUT YOU DIDN'T ACTUALLY KNOW, CORRECT?

A. RIGHT.

Q. HAVE YOU THOUGHT ABOUT THE IMPACT THAT IT WOULD HAVE ON CATHOLIC KIDS FOR THE CITY TO EXCLUDE CATHOLIC SOCIAL SERVICES FROM FOSTER CARE?

THE COURT: ASSUMING THAT THEY ARE NOT LGBTQ?

MR. RIENZI: EITHER WAY, ACTUALLY. I DON'T MEAN TO SPECIFY. I JUST MEAN CATHOLIC, I DON'T MEAN TO SPECIFY.

THE WITNESS: WELL, IF WE ARE TALKING ABOUT CATHOLIC KIDS -- I HAVE MET A LOT OF CATHOLIC KIDS IN MY LIFE, I CAN'T RECALL ONE THAT HAS THE PROBLEM WITH SAME-SEX MARRIAGE THAT THE CHURCH DOES, SO I DON'T THINK THE EFFECT WOULD BE NEGATIVE ON CATHOLIC KIDS IF CSS CHANGED ITS PRACTICE.

BY MR. RIENZI:

Q. HOW ABOUT CATHOLIC FOSTER PARENTS?

A. YOU KNOW, I DID NOT HEAR IN YOUR WITNESSES AND I DON'T KNOW HOW OTHER CATHOLIC FOSTER PARENTS COME DOWN ON THE QUESTION OF SAME-SEX MARRIAGE. THEY -- I WAS ACTUALLY INTERESTED IN WHETHER YOUR WITNESSES WERE GOING

TO GO THERE, AND I THINK I HEARD THEM SAY THAT THEY BELIEVE IN THE TEACHINGS OF THE CATHOLIC CHURCH. AND I CAME AWAY THINKING THAT WAS A FAIRLY GENERIC STATEMENT. AND AS A CATHOLIC MYSELF, I BELIEVE IN THE TEACHINGS OF THE CATHOLIC CHURCH, TOO, JUST NOT ALL OF THEM, SO -- AND THAT'S MY EXPERIENCE WITH CATHOLICS IN GENERAL, THAT WE ARE A BIT SELECTIVE IN OUR FOLLOWINGS OF THE TEACHINGS OF THE CHURCH. SO I WOULD EXPECT THAT FOSTER PARENTS WOULD BE SIMILAR.

Q. BUT SOME MAY NOT BE, CORRECT?

A. I WOULD HAVE TO IMAGINE, SURE.

MR. RIENZI: YOUR HONOR, IF I CAN JUST HAVE ONE QUICK MINUTE, PLEASE?

THE COURT: YES.

(BRIEF PAUSE IN THE PROCEEDING.)

BY MR. RIENZI:

Q. MR. CERVONE, YOU SAID YOU HAVE KNOWN CATHOLIC SOCIAL SERVICES FOR A LONG TIME?

A. YES.

Q. WHAT IS YOUR OVERALL OPINION OF CATHOLIC SOCIAL SERVICES?

A. VERY POSITIVE.

MS. CORTES: OBJECTION AS TO RELEVANCE.

THE COURT: OVERRULED.

BY MR. RIENZI:

Q. AND YOU SAID YOU HAVE KNOWN MR. AMATO FOR A LONG TIME?

A. YES.

Q. AND I UNDERSTAND YOU DISAGREE WITH SOME OF THE -- YOU DIDN'T LIKE SOME OF THE THINGS HE SAID YESTERDAY, CORRECT?

A. YES.

Q. DO YOU THINK HE IS AN HONEST GUY?

A. YES.

Q. AND SO YOU DON'T THINK HE IS LYING WHEN HE TESTIFIES, CORRECT?

A. I WOULD NEVER CALL JIM AMATO A LIAR. I HAVE NO IDEA HOW HE FEELS ABOUT THE ISSUES HE TESTIFIED TO.

MR. RIENZI: NOTHING FURTHER, YOUR HONOR.

THE COURT: OKAY. ANY OTHER QUESTIONS?

MS. CORTES: NO, YOUR HONOR.

THE COURT: THANK YOU.

THE WITNESS: THANK YOU, JUDGE.

MS. CORTES: AND, YOUR HONOR, WITH MR. CERVONE'S TESTIMONY, THE DEFENDANTS WOULD LIKE TO MARK EXHIBITS, ALL THE EXHIBITS THAT THE DEFENDANTS HAVE MARKED. I BELIEVE IT'S 1 THROUGH 6, BUT I WILL DEFER TO THE COURT RECORD ON THAT, AND WE WOULD ALSO WANT TO MAKE SURE THAT PLAINTIFFS' EXHIBITS 13 AND 15 ARE MARKED AND MOVED INTO THE RECORD ALONG WITH THE AFFIDAVITS OF MS.

KIMBERLY ALI AND COMMISSIONER CYNTHIA FIGUEROA.

MR. RIENZI: YOUR HONOR, WE WOULD OBJECT ON THE DECLARATIONS OF THEIR WITNESSES AND WE WOULD SIMPLY SAY -- WE ARE FINE IF WE WANT TO HAVE A RULE THAT SAYS BOTH SIDES' DECLARATIONS OF THEIR WITNESSES COME IN. THAT WAS WHAT WE WERE PROPOSING YESTERDAY, ON TUESDAY, TO GET THE DECLARATIONS OF ALL WITNESSES IN, BUT I DON'T SEE HOW WE COULD POSSIBLY HAVE RULE THAT SAYS THE PLAINTIFFS' DECLARATIONS GET KEPT OUT, BUT THE DEFENSE DECLARATIONS --

THE COURT: WELL, I BELIEVE THAT THE COURT RULED THAT THE WITNESS WHO WAS NOT HERE TO TESTIFY, HER AFFIDAVIT COULD BE ADMITTED. NOW, IF YOU WISH TO HAVE -- I DON'T BELIEVE THAT THERE WAS A REQUEST FOR THE OTHER AFFIDAVITS TO BE ADMITTED OF THE OTHER WITNESSES WHO TESTIFIED.

MR. RIENZI: I APOLOGIZE, I MAY HAVE BEEN UNCLEAR AT SOME POINT ABOUT THAT, BUT TO THE EXTENT WE ARE DOING THIS NOW, I WOULD CERTAINLY MOVE THAT THE DECLARATIONS OF OUR OTHER WITNESSES WHO TESTIFIED CAN BE ADMITTED INTO THE RECORD. THEY ARE PROPERLY BEFORE THE COURT. IT'S RULE 65, WHICH ALLOWS DECLARATIONS.

MR. FIELD: YOUR HONOR, IF I MIGHT, WE HAD UNDERSTOOD THEIR REQUESTS AND THE COURT'S RULING YESTERDAY TO BE THAT THE AFFIDAVITS OF THEIR WITNESSES

WHO DID TESTIFY WERE ALSO ADMITTED IN ADDITION TO DOE FOSTER MOTHER NUMBER 1. IF THAT WAS NOT THE CASE, WE WOULD NOT BE MAKING THE MOTION AS TO THE AFFIDAVITS OF OUR WITNESSES WHO TESTIFIED.

THE COURT: OKAY. SO THE WITNESSES WILL BE -- THE AFFIDAVITS WILL BE PERMITTED TO BE ADMITTED.

MR. RIENZI: TO MAKE SURE I AM CLEAR BECAUSE I -- I THINK WE DID NOT HAVE --

MR. FIELD: TESTIFYING WITNESSES PLUS DOE FOSTER MOTHER NUMBER 1.

MR. RIENZI: SO I THINK I CAN WITHDRAW MY OBJECTION TO THE ALI AND FIGUEROA DECLARATIONS, BUT THEN THE FULTON, PAUL, SIMMS-BUSCH, AMATO AND DOE MOTHER 1 DECLARATIONS, I THINK WE HAVE AGREEMENT THEY ARE ALL IN, ALONG WITH ALI AND FIGUEROA.

THE COURT: WELL, NOT AGREEMENT AS TO DOE MOTHER 1.

MR. RIENZI: DOE MOTHER 1 YOU PERMITTED.

THE COURT: I PERMITTED THAT.

MR. RIENZI: SO THEN YES, I WITHDRAW MY OBJECTION TO THEIRS, AS LONG AS WE ARE CLEAR ON THE UNDERSTANDING AS TO ALL OF OUR DECLARATIONS.

THE COURT: OKAY.

MS. CORTES: THAT WOULD BE IT, YOUR HONOR. THEN WE WOULD REST.

YOUR HONOR, JUST TO MAKE THE RECORD CLEAR, AND I AM ASSUMING NO OBJECTION FROM MR. RIENZI, WE WOULD ALSO MOVE -- I THINK I SAID THIS, BUT JUST TO BE ABUNDANTLY CLEAR, I WOULD MARK AND MOVE TO ADMIT PLAINTIFF'S EXHIBIT 13 AND 15 INTO EVIDENCE.

THE COURT: YES, I BELIEVE THAT THEY WERE ADMITTED PREVIOUSLY.

MR. RIENZI: AND, YOUR HONOR, TO THE EXTENT THERE WAS ANY LACK OF CLARITY, I WOULD ALSO MOVE TO ADMIT ALL OF THE EXHIBITS THAT WE HAD IN, OBVIOUSLY WITH THE EXCEPTION OF THE TWEETS THAT WE HAD THE OFFER OF PROOF ON EARLIER THIS MORNING.

THE COURT: YES. THE TWEETS -- SOME OF THEM WERE MARKED, SOME OF THEM WERE NOT MARKED, BUT THEY ARE PART OF THE RECORD.

MR. RIENZI: THANK YOU, YOUR HONOR.

THE COURT: OKAY. BEFORE WE PROCEED TO CLOSING, IS THERE ANYTHING FURTHER FROM THE PLAINTIFF?

MR. RIENZI: NOTHING ON EVIDENCE, YOUR HONOR. ONE HOUSEKEEPING DETAIL I JUST WANTED TO BE CLEAR ON. I UNDERSTAND OUR DEADLINE FOR RESPONDING TO THE MOTION TO INTERVENE TO BE FRIDAY, JUNE 29TH, AND I AM CALCULATING THAT BASED ON WHEN WE ACTUALLY RECEIVE THE BRIEF. IF YOU RECALL, THERE WAS AN EARLIER FILING THAT ESSENTIALLY ALERTED EVERYBODY -- AND I APPRECIATE

IT, ALERTED EVERYBODY THAT SOMETHING WOULD BE COMING. AND I JUST WANT TO MAKE SURE THE COURT IS NOT THINKING THAT OUR DEADLINE RUNS FROM THAT EARLIER ALERT. I ASSUME WE GET THE TWO WEEKS FROM WHEN THEY ACTUALLY FILED THE MOVING PAPERS.

MS. ROPER: NO OBJECTION FROM THE POTENTIAL INTERVENORS.

THE COURT: OKAY. THAT'S 6/29?

MR. RIENZI: THAT'S WHAT I HAVE, YOUR HONOR.

THE COURT: BEFORE THE COURT HEARS CLOSING ARGUMENTS, I BELIEVE THAT WE HAVE A REQUEST FROM THE -- AT THIS POINT THE ACLU TO ADDRESS THE COURT?

MS. ROPER: YES, YOUR HONOR, THE ACLU AND THE PARTIES THAT REPRESENTS AS AMICI PHILADELPHIA FAMILY PRIDE. BUT ESSENTIALLY, YES, YOUR HONOR, AN ATTORNEY FROM THE ACLU WOULD ARGUE.

THE COURT: THE COURT IS INCLINED TO PERMIT IT, BUT I GUESS THE QUESTION IS AT WHAT POINT. I THINK IT WOULD BE APPROPRIATE TO LET THE PLAINTIFFS PROCEED, THEN HEAR FROM THE DEFENSE, THE AMICI, AND THEN ANY RESPONSE THAT COUNSEL FOR PLAINTIFFS WISH TO MAKE.

MS. ROPER: IT CERTAINLY SUITS US, YOUR HONOR. WE DON'T INTEND TO REPEAT THINGS THE CITY HAS ALREADY SAID. WE WILL TRY TO RESPECT EVERYBODY'S TIME.

THE COURT: WILL COUNSEL NEED A FEW MINUTES BEFORE WE PROCEED?

MR. RIENZI: I WOULD LOVE A FEW MINUTES BEFORE WE START.

THE COURT: OKAY, THEN WE WILL TAKE A FEW MINUTES.

MR. RIENZI: THANK YOU VERY MUCH.

MS. CORTES: THANK YOU, YOUR HONOR.

(BRIEF RECESS.)

THE COURT: ARE WE READY TO PROCEED?

MR. RIENZI: I AM, YOUR HONOR.

THANK YOU, YOUR HONOR. AS YOU KNOW, WE ARE HERE ON PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER OR A PRELIMINARY INJUNCTION. AS YOU HAVE HEARD FROM THE WITNESSES, THE SITUATION IS URGENT. RIGHT NOW THERE IS ONGOING HARM. THERE ARE BEDS THAT ARE EMPTY FROM PARENTS WHO WORK WITH CATHOLIC SOCIAL SERVICES TO WHOM THE CITY IS REFUSING TO SEND CHILDREN, NOT BECAUSE THE CITY THINKS THOSE ARE BAD HOMES, BECAUSE THE CITY IS FREEZING INTAKE TO THOSE HOUSES BECAUSE OF A SEPARATE FIGHT. RIGHT NOW THERE ARE ACTUALLY CHILDREN IN CONGREGATE CARE AND ELSEWHERE WHOSE LIVES WOULD BE IMPROVED IF THEY WERE PLACED IN THOSE HOMES, AND THEY ARE NOT BEING PLACED IN THOSE HOMES. WE KNOW ABOUT SOME OF THEM. WE KNOW SOME OF THEIR NAMES. WE KNOW DOE

CHILD 1 BECAUSE WE FOUND OUT ABOUT DOE CHILD 1. THERE ARE A LOT OF KIDS WHOSE NAMES WE DON'T KNOW WHO COULD BE IN THOSE HOMES. YOU HEARD JIM AMATO TESTIFY THAT TYPICALLY THEY NEVER HAVE MORE THAN FOUR OR FIVE VACANCIES AND NOW THEY ARE GETTING UP TO 26. WELL, I DON'T KNOW THE NAMES OF THOSE KIDS, BUT THOSE ARE REAL HUMAN BEINGS, THEY BELONG IN GOOD FOSTER HOMES, THERE ARE LOVING HOMES AVAILABLE, AND BECAUSE OF THE CITY'S VIOLATION OF THE LAW, THEY ARE NOT ALLOWED TO BE THERE.

YOU HEARD MRS. PAUL TESTIFY ABOUT THE HARM TO HER, ABOUT THE FACT THAT THIS IS HER GIFT, THIS IS WHAT SHE DOES FOR THE WORLD. SHE HAS DONE IT FOR 133 CHILDREN. SHE WANTS TO CONTINUE PARTICIPATING, THE CITY WILL NOT SEND CHILDREN HER WAY. YOU HEARD JAMES AMATO TESTIFY ABOUT HOW THE JUNE 30TH DEADLINE WILL IMPACT, HOW LAYOFFS WILL NEED TO START SOON WITHOUT NEW REFERRALS, HOW THE FOSTER PROGRAM WILL NEED TO SHUT DOWN WITHIN A MATTER OF MONTHS.

THE CITY SAYS IT WILL ACCEPT A NEW CONTRACT, BUT IT WILL ONLY ACCEPT A NEW CONTRACT THAT EITHER A, INVOLVES CATHOLIC AGREEING TO VIOLATE ITS RELIGIOUS BELIEFS, WHICH IT SIMPLY CANNOT DO. OR B, REQUIRES CATHOLIC TO PROCEED WITH NO REFERRALS, WHICH IS SUICIDE FOR THE FOSTER AGENCY. SO THE SITUATION IS DIRE, THE HARM IS REAL, THERE ARE ACTUAL HUMAN BEINGS

WHO ARE AND WILL CONTINUE TO SUFFER WITHOUT RELIEF.

FORTUNATELY, STATE AND FEDERAL LAW MAKE THE CITY'S ACTIONS ILLEGAL AND PROVIDE A FIRM BASIS FOR A TEMPORARY RESTRAINING ORDER OR A PRELIMINARY INJUNCTION. SIMPLY PUT, THE GOVERNMENT IS ONLY ALLOWED TO FORCE SOMEBODY TO VIOLATE THEIR RELIGIOUS BELIEFS, WHICH IS PRECISELY WHAT THE CITY IS TRYING TO DO. GOVERNMENTS ARE ONLY ALLOWED TO PUT SOMEBODY IN THAT POSITION IF THEY HAVE A COMPELLING GOVERNMENT INTEREST AND THEY ARE USING THE LEAST RESTRICTIVE MEANS TO PURSUE THAT INTEREST. AND WHAT THE TESTIMONY MADE CLEAR OVER AND OVER AGAIN IS THAT THE GOVERNMENT'S CASE IS NOWHERE CLOSE TO THOSE STANDARDS.

LET ME START WITH THE RELIGIOUS FREEDOM PROTECTION ACT. THIS IS THE PENNSYLVANIA STATUTE. IT IS PARALLEL TO THE FEDERAL RFRA STATUTE THAT THE SUPREME COURT HAS RECENTLY INTERPRETED IN SEVERAL CASES. WHAT THE PENNSYLVANIA RFRA SAYS IS THAT THE GOVERNMENT CANNOT IMPOSE A SUBSTANTIAL BURDEN ON SOMEONE'S SINCERE RELIGIOUS EXERCISE UNLESS IT HAS A COMPELLING GOVERNMENT INTEREST, AND THE GOVERNMENT HAS TO DEMONSTRATE THAT. THE GOVERNMENT MUST DEMONSTRATE A COMPELLING GOVERNMENT INTEREST AND THAT IT IS USING THE LEAST RESTRICTIVE MEANS.

FIRST, SINCERE RELIGIOUS EXERCISE. I

THINK THAT MIGHT BE THE ONLY THING OR ONE OF THE FEW THINGS THAT THERE IS NO DISPUTE IN THE COURTROOM IN FRONT OF YOUR HONOR OVER THE LAST THREE DAYS. I DON'T THERE IS ANY DOUBT THAT CATHOLIC IS ENGAGED IN A SINCERE RELIGIOUS EXERCISE. THERE ARE FOLKS WHO DISAGREE WITH THAT EXERCISE. THERE ARE FOLKS WHO THINK THEY SHOULD HAVE A DIFFERENT VIEW OF THEIR RELIGIOUS PRINCIPLES, BUT I DID NOT HEAR ANYONE TO SUGGEST THAT CATHOLIC WAS ACTING ON ANYTHING OTHER THAN ITS SINCERE RELIGIOUS BELIEFS.

PENNSYLVANIA LAW GIVES FOUR WAYS IN WHICH A GOVERNMENT ACTION CAN IMPOSE A SUBSTANTIAL BURDEN, AND HERE EVERY ONE OF THEM IS MET. ONE ALONE WOULD DO, BUT ALL FOUR ARE MET. THE GOVERNMENT'S ACTION CONSTRAINS OR INHIBITS CONDUCT OR ITS EXPRESSION MANDATED BY A PERSON'S SINCERELY-HELD RELIGIOUS BELIEFS. THAT'S THE CASE HERE. CATHOLIC TAKES CARE OF CHILDREN BECAUSE OF JESUS' INJUNCTION TO TAKE CARE OF CHILDREN AND TO TAKE CARE OF WIDOWS AND ORPHANS, IN THE BIBLE. IT'S OBVIOUSLY SINCERE RELIGIOUS BELIEF.

THEIR BELIEFS ABOUT SEX AND MARRIAGE ARE ALSO SINCERE RELIGIOUS BELIEFS. THERE HAS BEEN NO CLAIM THAT IT IS ANYTHING OTHER THAN A SINCERE BELIEF THAT THEY ARE ACTING ON. SIGNIFICANTLY CURTAILS A PERSON'S ABILITY TO EXPRESS ADHERENCE TO THE PERSON'S RELIGIOUS

FAITH. WELL, BY FORCING CATHOLIC TO CERTIFY THE RELATIONSHIPS OF SAME-SEX COUPLES, THE GOVERNMENT WOULD BE CURTAILING CATHOLIC'S ABILITY TO EXPRESS ADHERENCE TO THEIR RELIGIOUS FAITH. THEY WOULD BE FORCING THEM AS A REQUIREMENT TO HELP KIDS TO PUBLICLY VIOLATE THEIR RELIGIOUS BELIEFS.

AND TO BE CLEAR, CATHOLIC IS NOT SAYING, I NEED TO GO IN AND TELL EVERYBODY COUPLE A OR COUPLE B IS A BAD COUPLE. CATHOLIC IS NOT RUSHING TO SAY, LET ME GO PASS JUDGMENT. CATHOLIC IS SAYING, PLEASE LET ME STAND ASIDE. PLEASE LET ME STAND ASIDE. I DON'T WANT TO HAVE TO SIT DOWN AND WRITE EVALUATIONS OF SOME COUPLE'S LIFE THAT MY CHURCH DISAGREES WITH. I DON'T WANT TO WRITE THAT. AND SO CATHOLIC FOR YEARS HAS JUST HAD THE POSITION THAT IF SOMEBODY COMES AND ASKS ME, I AM JUST GOING TO STEP ASIDE, RIGHT.

THEY ARE NOT GOING TO SAY, NO, YOU CAN'T BE A FOSTER PARENT. THEY JUST WANT TO SAY I HAVE GOT RELIGIOUS BELIEFS THAT DON'T MATCH WITH WHAT YOU WANT TO DO, AND SO I AM NOT REALLY THE RIGHT PERSON TO WRITE THIS UP FOR YOU. BUT GUESS WHAT, THERE ARE 28 OTHERS IN THE CITY WHO ARE HAPPY TO DO IT. NOW, THAT'S UTTERLY HYPOTHETICAL, YOUR HONOR. IT'S UTTERLY HYPOTHETICAL. WE TALKED ABOUT SPECULATION A LOT WHEN PEOPLE WERE OBJECTING TO EACH OTHER'S QUESTIONS. THE WHOLE

CONTROVERSY IS SPECULATIVE BECAUSE THERE IS NO EVIDENCE OF A SINGLE ACTUAL APPLICANT EVER. NO EVIDENCE OF A SINGLE ACTUAL APPLICANT EVER WHO HAS ASKED CATHOLIC TO DO A HOME STUDY FOR FOSTER CARE AND WHO CATHOLIC HAS REFERRED AWAY. THERE'S NOT ONE, BECAUSE IT'S A HYPOTHETICAL DISPUTE. IN THAT HYPOTHETICAL DISPUTE, CATHOLIC'S RELIGIOUS BELIEFS ARE CLEAR AND THEIR RELIGIOUS EXERCISE WOULD BE CLEAR. THEY WOULD SAY, I CAN'T DO IT. BUT IT'S NEVER HAPPENED.

IT'S ALSO A SUBSTANTIAL BURDEN IF THE GOVERNMENT DENIES A PERSON THE REASONABLE OPPORTUNITY TO ENGAGE IN ACTIVITIES WHICH ARE FUNDAMENTAL TO THE PERSON'S RELIGION. WELL, TAKING CARE OF ORPHANS, FUNDAMENTAL, FUNDAMENTAL TO THE CATHOLIC CHURCH'S RELIGION. AND IT'S WORK THEY WERE DOING IN THE CITY LONG BEFORE THE CITY WAS DOING THE WORK IN THE CITY. THE CITY HAS IMPOSED A REGIME THAT SAYS, WELL, NOW YOU CAN ONLY DO IT UNDER CONTRACT WITH ME, AND MOST OF THE TIME CATHOLIC IS TOTALLY FINE TO DO IT THROUGH CONTRACT WITH THE CITY. BUT ULTIMATELY THIS WAS CHURCH WORK LONG BEFORE IT WAS CITY WORK. AND WHAT THE CITY IS SAYING NOW IS WELL, YOU GOT TO VIOLATE A COUPLE OF YOUR RELIGIOUS BELIEFS IF YOU WANT TO STILL TAKE CARE OF THE KIDS. THAT'S WHAT THEY ARE SAYING, AND ON PENNSYLVANIA LAW, THAT'S A SUBSTANTIAL BURDEN ON RELIGION.

THE FOURTH WAY YOU GET A SUBSTANTIAL BURDEN COMPELS CONDUCT OR EXPRESSION WHICH VIOLATES A SPECIFIC TENET OF A PERSON'S FAITH. AGAIN, THE SAME THING, RIGHT. THE GOVERNMENT IS TRYING TO FORCE CATHOLIC TO CERTIFY THINGS THAT IT JUST CAN'T CERTIFY TO. AND AGAIN, CATHOLIC IS NOT RUSHING TO SAY, I WANT TO GO CONDEMN, THEY ARE SAYING I WANT TO STAND ASIDE. AND IF YOU LET ME STAND ASIDE, I WANT TO GO TAKE CARE OF THOSE KIDS WHICH I HAVE BEEN DOING SINCE LONG BEFORE THE CITY DID.

UNDER PENNSYLVANIA LAW, THE ONLY WAY THE CITY CAN GET AWAY WITH IMPOSING THOSE BURDENS IS IF IT HAS A COMPELLING GOVERNMENT INTEREST. HERE YOU SAW THE EVIDENCE, THEY CAN'T COME CLOSE TO MEETING THAT BURDEN. THEY CAN'T COME CLOSE TO MEETING IT. WHY NOT? A COUPLE OF REASONS. ONE, THERE IS NO PROOF THAT ANYONE HAS EVER BEEN HARMED. THERE'S NO PROOF A SINGLE SOUL HAS EVER ASKED FOR THE SERVICE. ABSENT PROOF OF AT LEAST SOMEBODY BEING HARMED, RIGHT. EVEN THE EXPERT AT THE END, MR. CERVONE. TO HIS CREDIT, VERY HONEST MAN, SAID AT THE END, I AM JUST -- I AM PARAPHRASING, BUT HE SAID I SAID MAY, I DON'T REALLY KNOW. HE SAID MAY. HE DOES NOT REALLY KNOW. THE CITY DOES NOT REALLY KNOW.

WHEN MS. ALI WAS ON THE STAND AND IT WAS ASKED, IS THAT A REALLY IMPORTANT INTEREST -- OR I THINK

FIRST THE WORD WAS COMPELLING AND THEN THERE MAY HAVE BEEN AN OBJECTION TO IT. BUT SHE WAS ASKED ABOUT THE STRENGTH OF THAT INTEREST, WHAT'S THE STRENGTH OF YOUR INTEREST IN MAKING SURE EVERY AGENCY DOES THE HOME STUDIES? HER ANSWER WAS NOT, IT'S SUPREMELY IMPORTANT. HER ANSWER WAS, IT'S AN INTEREST LIKE ANY OTHER INTEREST THAT WE HAVE. THAT WAS HER ANSWER, IT'S IN THE TRANSCRIPT FROM MONDAY AFTERNOON OR TUESDAY. IT WAS NOT, THIS IS A SUPREMELY IMPORTANT INTEREST.

AND HERE IS HOW YOU ALSO KNOW THAT IT'S NOT A SUPREMELY IMPORTANT INTEREST, NO WITNESS COULD NAME ANY PLACE WHERE IT WAS EVER WRITTEN DOWN BEFORE, RIGHT. AND THIS IS A THEME THAT RUNS THROUGHOUT THE GOVERNMENT'S CASE. THEIR WHOLE CONTRACT ARGUMENT DEPENDS ON FOSTER CARE BEING A PUBLIC ACCOMMODATION. BEING A PUBLIC ACCOMMODATION, THEREFORE THE FAIR PRACTICE ORDINANCE COVERS IT. WELL, THEY HAVE BEEN RUNNING A FOSTER CARE SYSTEM FOR YEARS. BUT THERE IS NO INDICATION ANYPLACE THAT THEY HAVE EVER TAKEN THE POSITION THAT WHAT THEY WERE RUNNING IS A PUBLIC ACCOMODATION, NO INDICATION THAT THEY EVER TOLD THE AGENCIES IT WAS A PUBLIC ACCOMODATION. THERE'S JUST NOTHING.

IF IT WERE A PUBLIC ACCOMODATION, YOU COULD NOT DO ALL THE THINGS THAT THE STATE LAW REQUIRES

YOU TO DO, LIKE LOOK INTO SOMEBODY'S MENTAL STABILITY, LOOK INTO SOMEBODY'S EXISTING FAMILY RELATIONSHIPS, RIGHT. IMAGINE A WORLD WHERE YOU COULD DO THOSE THINGS -- WELL, HERE IS HOW YOU KNOW IT'S NOT A PUBLIC ACCOMMODATION. YOU CAN'T DO THOSE THINGS BEFORE SELLING SOMEBODY A CUP OF COFFEE OR A TICKET ON THE TRAIN, RIGHT. YOU CAN'T SAY, WELL, YOU ARE NOT COMING IN HERE BECAUSE I THINK YOU HAVE A MENTAL DISABILITY. YOU CAN'T SAY, YOU CAN'T COME IN HERE BECAUSE I HAVE EVALUATED YOUR EXISTING FAMILY RELATIONSHIPS AND I DON'T THINK THEY ARE THAT GREAT, RIGHT. YOU CAN'T DO THAT IN A REAL PUBLIC ACCOMMODATION.

FOSTER CARE IS NOT A PUBLIC ACCOMMODATION, NEVER HAS BEEN. IT'S A MADE-UP THEORY FOR THIS CASE THAT NO ONE CAN POINT TO ANY DOCUMENT ANYPLACE REFERENCING BEFORE THIS CASE. IT'S A NEWLY MINTED THEORY FOR THIS CASE, BUT IT DOES NOT WORK. BECAUSE BY DEFINITION FOSTER CARE IS NOT ABOUT EVERYBODY WHO LINES UP AND WANTS IT GETS IT. IT'S ABOUT LOOKING AFTER THE INTEREST OF CHILDREN. AND THE LAW HAS ALLOWED FOR YEARS, FOR MANY YEARS, DIFFERENT AGENCIES WITH DIFFERENT SPECIALTIES AND DIFFERENT REQUIREMENTS. STATE LAW DOES NOT SAY, THESE ARE THE ONLY REQUIREMENTS AND YOU MAY DO NO MORE. THAT IS NOT WHAT IT SAYS. STATE LAW SAYS THAT YOU GET TO CONSIDER THESE THINGS. IT SAYS

YOU ALSO CAN CONSIDER AN APPLICANT'S ABILITY TO WORK WITH THE AGENCY. AND IT CERTAINLY DOES NOT SAY YOU MAY ADD NO MORE, RIGHT.

AND THE CITY'S OWN WEBPAGE, WHICH MAYBE THEY WANT TO CHANGE NOW BECAUSE THEY REALIZE THAT IT'S INCONSISTENT WITH THEIR THEORY HERE. THE CITY'S OWN WEBPAGE SAYS THAT DIFFERENT AGENCIES CAN HAVE DIFFERENT REQUIREMENTS. THE CITY'S WEBPAGE REFERS FOSTER -- THE CITY'S FOSTER PARENT HANDBOOK REFERS THEM TO THAT STATE ASSOCIATION. THAT STATE ASSOCIATION SAYS THESE ARE MINIMUM REQUIREMENTS. EVERYTHING THAT PREDATES THIS CONTROVERSY SAYS THAT AGENCIES ARE ALLOWED TO HAVE THEIR OWN REQUIREMENTS AND THAT'S FINE. IT'S A JUDGMENT-CALL TYPE OF SITUATION, NOT A PUBLIC ACCOMMODATION. NOT EVERYBODY GETS ONE. IN REAL PUBLIC ACCOMMODATIONS, YOU CAN'T CONSIDER THE RACE OF THE CHILD OR THE RACIAL WISHES OF A FOSTER PARENT BEFORE PLACING THEM, BUT THEY DO. YOU CAN'T CONSIDER THE DISABILITY OF SOMEBODY BEFORE LETTING THEM DO SOMETHING, BUT THEY DO. THEY HAVE NOT DONE TO SHUT ANYBODY DOWN, THEY HAVE NOT TURNED OFF INTAKE TO THOSE PEOPLE BECAUSE IT'S NOT A PUBLIC ACCOMODATION. IT'S A NEWLY MINTED ARGUMENT. IT HAS NO BASIS IN THE WAY THEY HAVE DONE ANYTHING.

IF THAT WERE REAL, IF IT WERE ACTUALLY A COMPELLING INTEREST TO ENFORCE THAT, THEY WOULD ENFORCE

IT ON RACE AND ON DISABILITY, AND THEY WOULD HAVE TALKED ABOUT IT AND APPLIED IT TO THEMSELVES SOMETIME IN THE PRECEDING YEARS. THEY MADE IT UP FOR THIS CASE, YOUR HONOR, IT'S NOT REAL.

THE CITY ALSO LACKS A COMPELLING INTEREST BECAUSE THEY HAVE NO EVIDENCE THAT ANYBODY HAS ACTUALLY BEEN HARMED. AGAIN, THEY ARE CLAIMING TO RECTIFY A HARM. THERE IS NO INDICATION ANYBODY HAS BEEN HARMED. THERE IS NO INDICATION THAT SAME-SEX COUPLES ARE KNOCKING ON THE DOOR OF THE CATHOLIC CHURCH AND SAYING, HEY, CATHOLIC CHURCH, I WOULD LIKE YOU TO BE THE ONE WHO COMES IN AND EVALUATES MY FAMILY RELATIONSHIPS, RIGHT. THE CITY TELLS PEOPLE, GO LOOK FOR SOMEBODY WHO IS A GOOD FIT, RIGHT, THEY SAY LOOK FOR SOMEBODY WHO IS A GOOD FIT.

SO FAR AS WE KNOW, THERE HAVE BEEN NOT SAME-SEX COUPLES WHO GO TO THE CATHOLIC CHURCH AND SAY, COME ON INTO MY HOUSE AND TELL ME WHAT YOU THINK OF MY FAMILY RELATIONSHIPS. THAT ACTUALLY IS NOT TERRIBLY SURPRISING, RIGHT. THE CATHOLIC CHURCH HAS WELL-KNOWN TEACHINGS ON SEXUALITY AND MARRIAGE, AND IT'S ENTIRELY LIKELY THAT GAY FAMILIES DO NOT LOOK AT THE CATHOLIC CHURCH AND SAY, I WOULD LIKE YOU TO COME IN AND EVALUATE MY FAMILY LIFE. AND SO PEOPLE GO TO AGENCIES THAT ARE GOOD FITS FOR THEM. RELIGIOUS CATHOLICS GO TO CATHOLIC.

THERE ARE -- AS COMMISSIONER FIGUEROA SAID, THERE ARE 28 AGENCIES IN THE CITY THAT PROVIDE HOME STUDIES FOR LGBT COUPLES. ALTHOUGH SHE THINKS THAT'S TRUE, THEY ACTUALLY NEVER CHECKED WITH MOST OF THE SECULAR AGENCIES, BUT SHE THINKS THAT'S TRUE.

THERE IS NO INDICATION THAT THERE IS A PROBLEM. THERE IS NO INDICATION THAT A SINGLE SOUL HAS EVER BEEN DENIED THE ABILITY TO BE A FOSTER PARENT BY CATHOLIC'S RELIGIOUS BELIEFS. AND SO IN LIGHT OF ALL OF THAT, THEY SIMPLY DON'T HAVE A COMPELLING GOVERNMENT INTEREST UNDER STATE LAW.

THEY CERTAINLY HAVE NOT USED THE LEAST RESTRICTIVE MEANS AVAILABLE TO PURSUE THAT INTEREST. THERE ARE OTHER WAYS TO LET PEOPLE BECOME FOSTER PARENTS. THERE ARE LOTS OF AGENCIES, RIGHT. I THINK IT'S VERY TELLING THE TESTIMONY YOU HEARD OVER THE LGBTQ FOSTER PARENT RECRUITING EVENT IN THE MAYOR'S OFFICE OF LGBT AFFAIRS. THE OFFICE OF LGBT AFFAIRS IS A PART OF CITY GOVERNMENT AND IT EXISTS -- IT EXISTS TO SERVE LGBT PEOPLE. AND THERE'S NOT A PROBLEM WITH THAT, THERE IS NOTHING WRONG WITH THAT. WHY? BECAUSE IT'S NOT LIKE PEOPLE WHO ARE NOT LGBT CAN'T GO GET GOVERNMENT SERVICES. THEY CAN'T GET SERVICE FROM THAT OFFICE, BUT THEY CAN GET SERVICE FROM ANY OTHER OFFICE AND IT'S FINE. SO THE CITY DOES THAT DIRECTLY AS THE CITY, BUT

THE CITY IS SAYING THAT A NETWORK OF CONTRACTORS WHO ARE PRIVATE ENTITIES, WHO ARE NOT THE CITY, SOME OF WHOM ARE RELIGIOUS, THEY HAVE TO SERVE EVERYBODY ALL THE TIME, RIGHT, THAT'S THE CLAIM. CATHOLIC CAN ONLY DO THIS IF IT SERVES EVERYBODY ALL THE TIME.

AND I DON'T THINK IT'S JUST THAT THE CITY WANTS THEM TO DO THE HOME STUDY, I ASSUME THE CITY WANTS THEM TO DO THE HOME STUDY AND INSISTS -- AND INSISTS THAT THEY SAY THAT THESE COUPLES RELATIONSHIPS ARE GOOD AND THIS WOULD BE A GOOD PLACE TO RAISE CHILDREN.

THE COURT: NOW THAT'S SPECULATIVE.

MR. RIENZI: IT IS SPECULATIVE, YOUR HONOR. BUT I DON'T THINK IT WOULD DO MUCH GOOD IF WHAT THEY WERE SAYING WAS YOU HAVE GOT TO DO THE HOME STUDY, BUT YOU ARE FREE TO SAY NO. MAYBE THAT'S THEIR IDEA, BUT THEY SURE DON'T HAVE A COMPELLING INTEREST IN THAT, RIGHT. IF WHAT THEY ARE SAYING IS YOU GOT TO DO THE HOME STUDY, BUT WE DON'T CARE WHAT YOU SAY IN THE OUTCOME AND YOU ARE ALLOWED TO SAY THAT I DON'T THINK THIS IS A GOOD RELATIONSHIP. THEY REALLY COULD NOT POSSIBLY HAVE A COMPELLING INTEREST IN THAT BECAUSE THAT HELPS NOBODY. THAT WOULD REALLY JUST BE TRYING TO FORCE A RELIGIOUS GROUP TO VIOLATE ITS BELIEFS WITH NO BENEFIT TO ANYBODY. SO I DON'T THINK THAT'S WHAT THEY MEAN, BUT I AGREE WITH YOU, AND TO BE CLEAR, I DON'T MEAN TO

SUGGEST THERE WAS EVIDENCE ON THAT POINT.

THE GOVERNMENT HAS ALSO VIOLATED THE FREE EXERCISE CLAUSE. UNDER THE FREE EXERCISE CLAUSE, THE GOVERNMENT CAN'T -- WELL, THE GOVERNMENT FACES STRICT SCRUTINY IN SEVERAL DIFFERENT WAYS UNDER THE FREE EXERCISE CLAUSE. FIRST, IT'S RULE THAT YOU MUST DO EVERY HOME STUDY THAT SOMEBODY ASKS YOU FOR IS NOT A NEUTRAL AND GENERALLY APPLICABLE RULE. NOBODY CAN FIND ANY EXAMPLE OF WHEN THEY HAVE EVER SAID IT BEFORE THIS CONTROVERSY. YOU HEARD TESTIMONY FROM JIM AMATO AND FROM TONI SIMMS-BUSCH ABOUT THE MANY CIRCUMSTANCES IN WHICH FOSTER AGENCIES DO SEND PEOPLE TO OTHER AGENCIES THAT THEY THINK ARE BETTER FITS FOR THEM.

THE CLAIMED POLICY THAT YOU MUST DO EVERY HOME STUDY IS NOT NEUTRAL AND IT'S NOT GENERALLY APPLICABLE. IN FACT, IT HAS NOT BEEN APPLIED AND IT'S NOT RELIGIOUSLY NEUTRAL BECAUSE IT WAS INVENTED -- IT WAS INVENTED TO DEAL WITH THE SITUATION OF TWO RELIGIOUS ENTITIES. THAT'S WHY IT WAS INVENTED, THAT'S WHY NO ONE CAN TALK ABOUT ANY REFERENCE TO IT ANY TIME OTHER THAN 2018, BECAUSE IT DID NOT EXIST.

THE CITY WHEN IT SET OUT TO EXAMINE THE PROBLEM WITH ONE EXCEPTION THERE WAS ADDED TODAY AFTER THE FACT, BUT WITH ONE EXCEPTION ONLY INQUIRED OF RELIGIOUS GROUPS. THEY DID NOT ASK WHETHER ANY OF THE

NONRELIGIOUS AGENCIES CERTIFIED SAME-SEX COUPLES AT ALL. AND SO THERE IS ONE ADDITION AT THE END OF ONE GROUP CALLED NET WHO HAPPENS TO BE FRIENDS WITH THE COMMISSIONER. THE REST OF THE NONRELIGIOUS GROUPS HAVE NEVER EVEN BEEN ASKED, RIGHT. SO THE GOVERNMENT ONLY SET OUT TO ASK THE RELIGIOUS GROUPS. AND THE GOVERNMENT HAS NEVER TOLD THE NONRELIGIOUS GROUPS, EITHER TELL ME YOUR POLICY ON SAME-SEX COUPLES, RIGHT. IT WOULD BE INTERESTING TO KNOW THAT. THE CITY ACTUALLY DOES NOT EVEN KNOW IT EVEN TODAY, CAN'T BE THAT COMPELLING, RIGHT. BUT ALSO, THEY HAVE NOT ASKED THEM, TELL ME WHETHER YOU DO A HOME STUDY FOR EVERYBODY WHO KNOCKS ON THE DOOR. THEY HAVE NOT TOLD THEM THAT THEY MUST DO THAT HOME STUDY AND THEY HAVE NOT INQUIRED AS TO WHETHER THEY ARE ACTUALLY DOING THAT HOME STUDY. THIS IS NOT A NEUTRAL AND GENERALLY APPLICABLE LAW, THIS IS A TARGETED -- A TARGETED INVESTIGATION ONLY ASKING ABOUT RELIGIOUS GROUPS, NOT APPLIED TO ANY OF THE NONRELIGIOUS GROUPS.

YOU HEARD ALSO FROM BOTH JIM AMATO AND FROM COMMISSIONER FIGUEROA ABOUT THE DIRECT RELIGIOUS DISCUSSIONS THAT THE GOVERNMENT ENGAGED IN WITH CATHOLIC. AGAIN, THE GOVERNMENT HAS NO DOUBT THAT CATHOLIC IS A RELIGIOUS ENTERPRISE. I DON'T THINK THEY HAVE ANY REAL -- THEIR LAWYER AT ONE POINT SAID FOSTER CARE WAS A BUSINESS. I DON'T THINK FROM WHAT YOU HEARD

FROM ANY OF THE WITNESSES, INCLUDING THE CITY'S WITNESSES, THAT IT'S PLAUSIBLE TO SAY THIS IS A BUSINESS. CATHOLIC DOES IT AT A LOSS OF ABOUT $3.8 MILLION A YEAR.

BUT WHEN TALKING ABOUT WHAT CATHOLIC SHOULD DO, COMMISSIONER FIGUEROA SAID TIMES HAVE CHANGED, IT'S NOT 100 YEARS AGO. YOU OUGHT TO LISTEN TO POPE FRANCIS. AND THERE WAS A LITTLE BIT OF A TENSION BETWEEN COMMISSIONER FIGUEROA'S TESTIMONY AND JIM AMATO'S. MR. AMATO TESTIFIED THAT SHE ALSO SAID YOU OUGHT TO LISTEN TO POPE FRANCIS INSTEAD OF THE ARCHDIOCESE OR INSTEAD OF THE ARCHBISHOP.

IT'S A GOVERNMENT OFFICIAL IN A GOVERNMENT BUILDING TELLING A RELIGIOUS ORGANIZATION WHICH RELIGIOUS LEADER TO LISTEN TO. THAT'S OUTRAGEOUS. THAT'S FAIRLY UNPRECEDENTED. THE GOVERNMENT DOES NOT GET TO GO TO THE RELIGIOUS GROUP AND SAY, I AM GOING TO TELL YOU WHICH RELIGIOUS LEADER YOU ARE GOING TO LISTEN TO. AND IF YOU DON'T DO IT MY WAY, WE ARE GOING TO TAKE YOU OUT OF THE FOSTER CARE BUSINESS. BUT THAT'S ESSENTIALLY WHAT THE CITY IS DOING. THEY TOLD US WHAT SET OF RELIGIOUS BELIEFS WE OUGHT TO FOLLOW. THE ARCHDIOCESE JUST CAN'T FOLLOW THOSE, THEY DISAGREE. THEY HAVE A DISAGREEMENT ABOUT A LOT OF THINGS, BUT THE GOVERNMENT SHOULD NOT BE TELLING PEOPLE WHICH RELIGIOUS

BELIEFS TO FOLLOW, WHICH RELIGIOUS LEADER TO FOLLOW.

THE GOVERNMENT CERTAINLY SHOULD NOT HAVE THE OPINION THAT THERE ARE CERTAIN RELIGIOUS BELIEFS THAT YOU REALLY OUGHT TO LET GO OF BY NOW, YOU REALLY OUGHT TO LET GO OF THAT ONE. THE GOVERNMENT HAS NO BUSINESS HAVING AN OPINION ON THAT, AND THEY CERTAINLY HAVE NO BUSINESS DIRECTLY TELLING RELIGIOUS GROUPS WHAT RELIGIOUS BELIEFS ARE OKAY AND WHAT ARE NOT OKAY. THAT IS OUTRIGHT AND OPEN RELIGIOUS DISCRIMINATION FROM A GOVERNMENT OFFICIAL IN A GOVERNMENT OFFICE. THEY ARE NOT ALLOWED TO DO IT.

SO YOU HAVE THE INVESTIGATION THAT STARTS WITH ONLY CALLING THE RELIGIOUS, THE INVESTIGATION THAT CONTINUES, WITH ONE EXCEPTION, NOT CHECKING WITH ANY OF THE NONRELIGIOUS EITHER ABOUT THIS OR ANY OTHER REFERRAL SITUATION, AND THEN YOU HAVE THE GOVERNMENT TELLING THEM THEY OUGHT TO GET OVER THEIR RELIGIOUS BELIEFS, THEY OUGHT TO LISTEN TO A CERTAIN RELIGIOUS LEADER.

THE COURT: WELL, IT'S NOT JUST A CERTAIN RELIGIOUS LEADER, IT'S THE HEAD OF THE CATHOLIC CHURCH.

MR. RIENZI: OH, IT SURE IS, YOUR HONOR. BUT THE GOVERNMENT DOES NOT GET TO BE THE ONE WHO FIGURES OUT WHAT POPE FRANCIS MEANS. BUT ARCHBISHOP CHAPUT HAS A DIFFERENT VIEW OF WHAT POPE FRANCIS MEANT THAN THE PHILLY INQUIRER DOES. I AM NOT COMPETENT TO

TELL THE ANSWER TO THAT EITHER, BUT THE GOVERNMENT SURE IS NOT COMPETENT TO TELL THAT, RIGHT, SO "YOU OUGHT TO LISTEN TO THE POPE" IS NOT A NEUTRAL STATEMENT, RIGHT. I THINK THEY HAVE A PRETTY CLEAR VIEW OF WHAT THEY THINK THE POPE MEANS. AND I DON'T THINK THE GOVERNMENT HAS GOT ANY BUSINESS HAVING A VIEW ON THE SUBJECT. THE GOVERNMENT HAS NO COMPETENCE AND NO AUTHORITY TO HAVE A VIEW ON THAT SUBJECT, CERTAINLY NOT TO THREATEN RELIGIOUS GROUPS WITH IT.

COMPELLED SPEECH, YOUR HONOR. UNDER -- AND JUST TO FINISH UP ON FREE EXERCISE. UNDER ANY OF THESE THEORIES, UNDER THE RELIGIOUS DISCRIMINATION THEORY, UNDER THE NOT-NEUTRAL AND GENERALLY-APPLICABLE THEORY AND UNDER THE THEORY THAT THERE ARE INDIVIDUALIZED GOVERNMENT EXEMPTIONS AND INDIVIDUALIZED GOVERNMENT ASSESSMENTS. YOU GET TO STRICT SCRUTINY UNDER THE FREE EXERCISE CLAUSE. ANY ONE OF THEM WILL DO, WE HAVE GOT ALL OF THEM. AND UNDER STRICT SCRUTINY AGAIN, THE GOVERNMENT CAN ONLY WIN IF IT COULD PROVE A COMPELLING GOVERNMENT INTEREST AND LEAST-RESTRICTIVE MEANS. IT CAN'T, IT HAS NOT -- FROM THEIR OWN MOUTHS THEY ACTUALLY SAID IT IS NOT THAT COMPELLING, THEY HAVE TO LOSE.

THERE'S ALSO A COMPELLED SPEECH CLAIM. THE GOVERNMENT WANTS TO FORCE CATHOLIC TO PROVIDE THESE

CERTIFICATIONS. CATHOLIC DOES NOT WANT TO DO IT. THAT IS A CLEAR CASE OF COMPELLED SPEECH. THE GOVERNMENT IS NOT ALLOWED TO SAY TO CATHOLIC, YOU HAVE TO SAY THE THINGS I WANT YOU TO SAY. BUT THAT'S WHAT THEY ARE TRYING TO DO. THEY ARE SAYING, IF YOU WANT TO DO FOSTER CARE FOR THESE OTHER FAMILIES, YOU ARE GOING TO HAVE TO MAKE THESE CERTIFICATIONS AND YOU ARE GOING TO HAVE TO EXPRESS YOUR OPINIONS ABOUT THESE FAMILIES AND THEIR RELATIONSHIPS. CATHOLIC DOES NOT WANT TO. UNDER THE FIRST AMENDMENT, THEY CAN'T BE REQUIRED TO.

YOU HEARD A LITTLE BIT OF TESTIMONY FROM THE CITY CLAIMING THAT RECRUITMENTS AND SIGNING UP OF FAMILIES -- I GUESS THEY SAID A COUPLE OF DIFFERENT THINGS. AT TIMES THEY SAID RECRUITMENT AND SIGNING UP OF FAMILIES IS PART OF THE CONTRACT. THERE IS NO INDICATION THAT THEY PAY ANYTHING FOR THAT. THERE IS NO INDICATION THAT THEY CHECK ANYTHING ON THAT. ELSEWHERE THEY SEEM TO SAY IT'S NOT DHS'S JOB, IT'S SOMEBODY ELSE'S JOB.

CERTAINLY CATHOLIC IS NOT ACTING AS THE CITY AND CERTAINLY IT IS NOT SPENDING MONEY UNDER THE CONTRACT WHEN IT JUST STEPS ASIDE. SO YOU MIGHT HAVE AN ARGUMENT ABOUT MAYBE THERE IS OVERHEAD AND SOMETHING ELSE, BUT WHEN CATHOLIC JUST SAYS, YOU KNOW WHAT, I CAN'T DO THAT, THEY ARE NOT SPENDING THE CITY'S MONEY,

THEY ARE NOT OPERATING AS THE CITY, THEY ARE OPERATING AS THEMSELVES AND THEY ARE STEPPING ASIDE. THEY ARE NOT TAKING ACTIONS UNDER THAT CONTRACT. THEY ARE CHOOSING NOT TO AND THEY ARE EXERCISING A STATUTORY AND CONSTITUTIONAL RIGHT TO CHOOSE NOT TO DO THAT.

THE CITY DOES NOT DENY AND, IN FACT, HAS BEEN CRYSTAL CLEAR THAT IT IS ATTEMPTING TO FORCE CATHOLIC TO MAKE WRITTEN CERTIFICATIONS ENDORSING THE RELATIONSHIPS OF COUPLES IN SAME-SEX MARRIAGE WHO APPLY FOR HOME STUDIES. THAT'S THE ONLY THING CATHOLIC COULD DO TO SATISFY THEM HERE. THEY HAVE TO FILL OUT THOSE STATE CRITERIA, AND IF THEY DON'T, THE CITY SAYS YOU ARE OUT OF LUCK AND YOU ARE OUT OF FOSTER CARE.

THE CITY IS RIGHT THAT WHEN THE CITY IS CONTRACTING THE CITY GETS A MEASURE OF DISCRETION. BUT THE CITY DOES NOT GET THE DISCRETION TO FORCE PEOPLE TO ENGAGE IN COMPELLED SPEECH AND IT DOES NOT GET THE DISCRETION TO FORCE PEOPLE TO VIOLATE THEIR RELIGIOUS BELIEFS. HERE, THEY ARE DOING BOTH OF THEM AND THEY MUST LOSE.

THE CITY ACTS LIKE IT WILL BE BIG DEAL, AND MR. CERVONE AT TIMES ACTED LIKE IT WOULD BE A BIG DEAL IF YOU MAINTAIN THE STATUS QUO. AND BY STATUS QUO, I MEAN THE STATUS QUO ANTE. SO THE STATUS QUO I AM REFERRING TO IS THE STATUS QUO BEFORE THEY CUT OFF

REFERRALS. SO UNTIL EARLY MARCH IS WHAT I MEAN BY THE STATUS QUO, BECAUSE THAT'S WHAT WE ARE ASKING YOUR HONOR TO PUT BACK IN PLACE, AT LEAST FOR A PERIOD OF TIME WHILE WE LITIGATE THE REST OF THE CASE.

THE CITY ACTS LIKE IT WOULD BE A BIG DEAL TO RESUME THAT STATUS QUO. THE REALITY IS THEY OPERATED UNDER THAT STATUS QUO FOR A LONG TIME AND NOBODY HAD A PROBLEM. THERE WAS NO PROBLEM. THERE IS NOT A SINGLE SAME-SEX FOSTER PARENT APPLICANT WHO HAS NOT BEEN ABLE TO BECOME A FOSTER PARENT, ZERO. AND YOU HEARD MR. AMATO'S TESTIMONY THAT ACTUALLY SINGLE SAME-SEX PEOPLE WHO APPLY TO THEM GET CERTIFIED, RIGHT. IT'S REALLY THIS NARROW ISSUE. AS A RELIGIOUS MATTER, THE CHURCH CAN'T DO THE CERTIFICATION ABOUT THE RELATIONSHIPS. THAT'S IT. AND THE CITY'S SOLUTION IS YOU ARE GONE, YOU ARE OUT OF THIS WORK, AND SURE IT'S BAD IF SOME KIDS GET TRANSFERRED, SURE IT'S BAD IF SOME HOMES SAY EMPTY, SURE IT'S BAD IF SOME KIDS STAY AT PLACES THEY SHOULDN'T BE, BUT WE WILL EVENTUALLY CATCH UP AND SORT IT OUT.

BUT THAT'S NOT THE LAW. THE LAW IN THIS COUNTRY ALLOWS FOR DIVERSITY. IT ALLOWS FOR DIVERSITY. AND SO IT ALLOWS A WORLD IN WHICH YOU HAVE BOTH GAY FOSTER PARENTS AND A CATHOLIC AGENCY THAT HAS DIFFERENT BELIEFS ABOUT RELIGION AND SEX. AND THEY DON'T ALL HAVE TO AGREE ON EVERYTHING ALL THE TIME. I THINK ONE OF THE

TEACHINGS OF THE MASTERPIECE CASE, WHICH JUST CAME OUT A COUPLE OF WEEKS AGO, WAS PRECISELY THAT WE HAVE TO FIND WAYS TO ACTUALLY LIVE TOGETHER IN THIS SOCIETY OF PEOPLE WHO DON'T ALL SHARE THE SAME BELIEFS. IT'S A FREE PEOPLE. SO IN A FREE PLACE WE ARE NOT ALWAYS GOING TO SHARE THE SAME BELIEFS. IT CAN'T BE THE CASE THAT WE GET TO A POINT WHERE THERE IS ONE ACCEPTABLE VIEW ON MARRIAGE AND THEN YOU CAN'T DO ANY SOCIAL WORK IN THE CITY OR YOU CAN'T DO THIS SOCIAL WORK UNLESS YOU SHARE IT.

IN MASTERPIECE, THE MAJORITY ACTUALLY TALKED ABOUT THE SITUATION OF A CHURCH REFUSING TO DO A SAME-SEX WEDDING AND THEY SAID THAT WAS THE EASY CASE, RIGHT. THEY SAID THE HARDER CASE, SELLERS OF COMMERCIAL SERVICES, THE BUSINESS GUY SELLING THE CAKES, EVEN THAT THAT GUY WON, BUT THE EASY CASE TO THEM IN THEIR OPINION WAS THE CLERGY WHO SAYS, I CAN'T DO THE WEDDING. WELL, CATHOLIC IS PRECISELY IN THAT SITUATION, RIGHT. CATHOLIC IS LIKE THE CLERGY. THEY ARE PART OF THE CATHOLIC CHURCH AND THEY ARE SIMPLY SAYING, LOOK, I CAN'T DO THINGS THAT OPENLY AND DIRECTLY VIOLATE MY RELIGIOUS BELIEFS. I WANT TO GO TAKE CARE OF THE KIDS IN THE CITY AS I HAVE FOR DECADES, I CAN'T DO THIS THING THAT VIOLATES MY RELIGIOUS BELIEF. WHAT MASTERPIECE SAID ABOUT THAT IS THAT THAT'S OKAY BECAUSE PEOPLE CAN

ACCEPT THAT THAT IS A RELIGIOUS EXERCISE AND BECAUSE IT'S NOT STANDING IN THE WAY OF PEOPLE GETTING -- IT'S NOT HARMING DIGNITY OR STANDING IN THE WAY OF PEOPLE GETTING SERVICES, BECAUSE THEY CAN GET SERVICES ELSEWHERE.

THE SAME IS TRY HERE. MARRIAGES, LIKE FOSTER CARE, HAVE SOME RELATIONSHIP TO THE GOVERNMENT, RIGHT. YOU NEED A LICENSE FROM THE GOVERNMENT TO GET MARRIED. SO IT'S NOT THAT IT'S UTTERLY UNCONNECTED TO THE GOVERNMENT. BUT WHAT IT IS IS THAT PEOPLE CAN UNDERSTAND NOT EVERY CHURCH HAS TO HAVE THE SAME VIEWS ABOUT SEX AND MORALITY. IT'S KIND OF RIDICULOUS TO THINK THAT EVERY CHURCH IS GOING TO HAVE IDENTICAL VIEWS ON THOSE THINGS, AND THE GOVERNMENT SHOULD NOT BE IN THE POSITION OF TRYING TO CRUSH ONE, TRYING TO KICK IT OUT OF THE PUBLIC SPHERE BECAUSE IT HAS THE WRONG VIEWS. TEACHINGS OF OBERGEFELL AND MASTERPIECE ACTUALLY BOTH POINT IN THE DIRECTION OF SAYING, WE ARE ALLOWED TO HAVE DISAGREEMENT AND WE HAVE GOT TO FIND WAYS TO WORK TOGETHER. AND HERE THE LOGICAL WAY TO WORK TOGETHER IS TO LET CATHOLIC KEEP TAKING CARE OF KIDS, BUT NOT KICK THEM OUT OF THE SPHERE JUST BECAUSE THEY HAVE A DIFFERENT SET OF RELIGIOUS BELIEFS. THE CITY MAY WISH THAT THEY WOULD MOVE ON FROM THOSE BELIEFS. MR. CERVONE MAY WISH THAT THEY WOULD MOVE ON FROM THOSE BELIEFS, BUT

THEY ARE ENTITLED TO HAVE THEM. STATE AND FEDERAL LAW LET THEM HAVE THEM.

WITH THAT, YOUR HONOR, WE SUGGEST THAT -- WE VERY MUCH ASK THIS COURT TO PROVIDE A TEMPORARY RESTRAINING ORDER OR PRELIMINARY INJUNCTION AND DO TO SO AS QUICKLY AS POSSIBLE. AND IF I COULD THEN RESERVE THE REST OF MY ARGUMENTS FOR REBUTTAL AFTERWARD. THANK YOU.

THE COURT: OKAY. I WILL HEAR FROM THE CITY.

MS. EWING: MAY IT PLEASE THE COURT, CATHOLIC SOCIAL SERVICES ASKED FOR THIS HEARING FOR THE EXTRAORDINARY RELIEF OF A TEMPORARY RESTRAINING ORDER ON THE BASIS THAT IT WOULD SUFFER IMMEDIATE AND IRREPARABLE HARM UNLESS THE CITY WILL BE ORDERED TO OPERATE UNDER AN EXPIRED CONTRACT OR SOON-EXPIRED CONTRACT OR TO ENTER INTO A NEW FULL CONTRACT WITH CSS IMMEDIATELY. THERE HAVE BEEN MULTIPLE DAYS OF TESTIMONY WHICH HAVE DEMONSTRATED THAT THERE IS NO NEED FOR SUCH EXTRAORDINARY RELIEF IN THIS CASE. NONE OF THE HARMS THAT CATHOLIC SOCIAL SERVICES FOCUSED ON, WHETHER ITS OWN LOSS OF BUSINESS, OR ITS FOSTER PARENTS' INTEREST, OR ITS FAILED ATTEMPT TO SUGGEST THAT THE CITY IS NOT ACTING IN THE BEST INTEREST OF CHILDREN, SATISFIES THE INJUNCTION STANDARD. NOR IS CSS LIKELY TO SUCCEED ON THE MERITS, AND BOTH THE CITY AND THE PUBLIC INTEREST

WILL SUFFER IF THIS COURT WERE TO ISSUE AN INJUNCTION.

I AM GOING TO FOCUS ON THE KEY EVIDENCE FROM THIS WEEK'S HEARING AND A FEW ISSUES WHICH WERE DIRECTLY RAISED BY CATHOLIC. SINCE THIS WAS AN EVIDENTIARY HEARING AND IN THE INTEREST OF BREVITY, THE CITY RELIES ON OUR BRIEFING FOR ANY MERITS ARGUMENTS THAT I DO NOT DISCUSS AGAIN TODAY.

FIRST, I WANT TO TALK ABOUT HARM A LITTLE BIT. CATHOLIC HAS PRESENTED NO EVIDENCE OF URGENT OR ACTUAL IRREPARABLE HARM THAT WOULD MERIT AN INJUNCTION. ALL OF THEIR ATTEMPTS TO SHOW HARM HAVE EITHER FAILED OR THEY ARE IRRELEVANT TO A TRO, PRELIMINARY INJUNCTION ANALYSIS. FIRST, CATHOLIC SOCIAL SERVICES ARGUED THAT THEY WON'T BE ABLE TO PROVIDE FOSTER CARE AS PART OF ITS RELIGIOUS MISSION WITHOUT A CONTRACT WHICH ALLOWS NEW PLACEMENTS. BUT THEIR OWN TESTIMONY ABOUT THEIR OTHER FOSTER CARE ACTIVITIES, SUCH AS CONGREGATE CARE, THEIR CONTRACTS WITH OTHER COUNTIES TO PROVIDE FOSTER CARE, AND INDEED THEIR OTHER CONTRACTS WITH THE CITY ALL SHOW THAT CATHOLIC SOCIAL SERVICES WILL BE ABLE TO EXERCISE ITS CHARITABLE MISSIONS TO BE TAKING CARE OF CHILDREN, AND REBUT THEIR CLAIM. AND THEIR HARMS TO -- THAT ARE IN THE NATURE OF BUSINESS LOSSES, SUCH AS WHETHER THEY WILL LOSE CONTRACTS SO THAT THEY MAY HAVE TO DOWNSIZE, THESE TYPES OF HARMS ARE NOT CONSIDERED IRREPARABLE IN

THIS CIRCUIT. AND IT IS NOT CRITICAL. ONE OF THE SORT OF THINGS THAT WE HAVE -- THERE HAS BEEN A LOT OF DISCUSSION WHETHER THEY ARE A BUSINESS, WHETHER THEY ARE NOT A BUSINESS. THEY ARE A NONPROFIT COOPERATION WITH EMPLOYEES AND THEY ENGAGE IN -- AND THEY ENTER INTO CONTRACTS TO PERFORM SERVICES AND ARE CLAIMING BUSINESS HARMS.

SECOND, THEY TRIED TO PORTRAY A FOSTER CARE CRISIS, ALTHOUGH IT IS UNCLEAR HOW CATHOLIC ITSELF IS HARMED BY THAT ALLEGATION IN A WAY THAT WOULD WARRANT A TRO. BUT EVEN THEIR CLAIM THERE THAT THIS IS SOME KIND OF OVERALL URGENT FOSTER CARE CRISIS WAS BELIED BY THE TESTIMONY OF -- CERTAINLY BY THE DHS WITNESSES. SIMILARLY, THERE IS NO EVIDENCE OF ANY CRISIS THAT HAS RESULTED FROM DHS HALTING THE INTAKE TO CATHOLIC SOCIAL SERVICES. THEIR EVIDENCE IS THAT THERE ARE SOME OPEN CATHOLIC FOSTER HOMES.

THEY HAVE ALSO TRIED TO ARGUE THAT THE WAY THAT THE DEPARTMENT OF HUMAN SERVICES HAS HANDLED EXCEPTIONS TO INTAKE FOLLOWING THE INTAKE CLOSURE HAS SOMEHOW HARMED OR THREATENED TO HARM CHILDREN. AGAIN, THE EVIDENCE THAT HAS BEEN PRESENTED IS THAT DHS IS LOOKING AT THIS ISSUE FROM THE PRISM OF THE BEST INTEREST OF THE CHILDREN, THAT THEY HAVE DETERMINED THAT ALL CURRENT KIDS CAN REMAIN WITH THEIR FAMILIES UNTIL

THEY LEAVE THE SYSTEM, THAT IF NECESSARY THAT FOSTER FAMILIES WILL BE ABLE TO WORK WITH OTHER AGENCIES AS HAS BEEN DONE IN THE PAST WITH MANY OTHER CLOSURES OR LOSSES OF CONTRACTS FOR FOSTER CARE. AND THE TESTIMONY FROM THE THREE FOSTER PARENTS DID NOT RULE THIS OUT. NOT SURPRISINGLY, BECAUSE YOU WOULD EXPECT THAT THEY WOULD WANT TO STAY IF THEY HAVE A BOND WITH THE CHILD, THAT THAT WOULD BE THE DETERMINATIVE FACTOR. BUT THE EVIDENCE IS ALSO THAT DH LEADERSHIP HAS AND WILL ALLOW INTAKE EXCEPTIONS FOR BEST INTEREST REASONS. AND THESE ARE REASONS SUCH AS SIBLINGS COMING INTO CARE AND GOING TO THE FOSTER FAMILY THAT IS LOOKING AFTER OTHER SIBLINGS IN THE FAMILY. OR IF THERE IS A FORMER FOSTER PARENT INVOLVED WHERE THAT WOULD BE A GOOD FIT TO GO BACK. BUT THERE HAS BEEN NO EVIDENCE THAT WHERE -- IN ANY INSTANCE IN WHICH DHS LEADERSHIP HAS BEEN ASKED FOR AN EXEMPTION OR IT HAS BEEN BROUGHT TO THEIR ATTENTION THAT THERE IS ONE OF THESE CASES THAT ANY PERMISSION HAS BEEN DENIED. IT HAS ALWAYS BEEN GRANTED.

SO FINALLY, WE HAVE THE TESTIMONY OF MR. AMATO WHO APPEARED TO TESTIFY THAT DHS, YOU KNOW, WOULD NEGOTIATE AN INTERIM TRANSITIONAL CONTACT WITH THE CITY TO -- RATHER THAN WALK AWAY FROM -- ON JUNE 30TH WITH NO CONTRACT AND CLOSE ITS FOSTER HOMES. THE CITY HAS OFFERED AN INTERIM AGREEMENT TO CSS WHICH WILL EVEN KEEP

COMPENSATION RATES THE SAME AS IN THE CURRENT CONTRACT AND WILL LAST -- WE HAVE OFFERED THEM A ONE-YEAR CONTRACT IN ORDER TO ALLOW THE RELATIONSHIP TO WIND DOWN WITH -- YOU KNOW, IN AN ORDERLY FASHION. THAT IN ITSELF REMOVES ANY URGENCY WHICH COULD WARRANT ANY EXTRAORDINARY RELIEF FROM THIS COURT.

NOW, I WOULD LIKE TO TALK A LITTLE BIT ABOUT THE MERITS, ANOTHER PRONG OF THE TRO, PRELIMINARY INJUNCTION ANALYSIS. THERE HAVE BEEN MANY ARGUMENTS MADE IN THIS CASE WHICH THE CITY REGARDS AS EITHER DWELLING ON IRRELEVANT POINTS OR TO THE EXTENT THEY ARE IRRELEVANT, OFFERING INADEQUATE EVIDENCE TO SUSTAIN THEM. I WANT TO GO THROUGH A FEW OF THOSE. FOR EXAMPLE, WHETHER OR NOT CATHOLIC SOCIAL SERVICES IS PERFORMING ITS FOSTER CARE WORK AS A RELIGIOUS MISSION IS NOT THE POINT. THIS IS NOT A CASE IN WHICH THE CITY IS COMING IN TO INTERFERE WITH PRIVATE CHARITABLE WORK. THE FACT THAT -- IT'S THE OPPOSITE, IT'S -- CATHOLIC SOCIAL SERVICES HAS ACCEPTED A CONTRACT FROM THE CITY OF PHILADELPHIA TO PERFORM WORK WHICH THE CITY OF PHILADELPHIA IS CHARGED WITH BY THE COMMONWEALTH TO TAKE CARE OF ABUSED AND NEGLECTED CHILDREN BY PROVIDING THEM WITH FOSTER CARE. AND WE HAVE DELEGATED THROUGH CONTRACTS PART OF THAT OBLIGATION, PART OF THE PROVIDING OF FOSTER CARE TO THE 28 OR 29 OR 30 FOSTER CARE

AGENCIES WHICH HAVE ENTERED INTO CONTRACTS WITH THE CITY. YOU DON'T HAVE TO SIGN A CONTRACT. YOU CAN NEGOTIATE THE CONTRACT, YOU CAN WALK AWAY. IF A PROVISION IS A DEAL BREAKER FOR ONE SIDE OR THE OTHER, YOU HAVE TO WALK AWAY, ONE SIDE OR THE OTHER.

SO THE FIRST POINT IS THAT YOU ARE NOT SUBSTANTIALLY BURDENED IF YOU AGREE TO A PROVISION IN A CONTRACT. YOU CAN'T THEN UNILATERALLY CHANGE THAT OBLIGATION AFTER THE CONTRACT HAS BEEN IN EFFECT AND SAY IT DOES NOT APPLY TO ME BECAUSE I HAVE THIS EXCEPTION OR FOR RELIGIOUS REASONS. THAT'S SOMETHING THAT NEEDS TO BE WORKED OUT UP FRONT. THESE CONTRACTS ARE TO PROVIDE PUBLIC SOCIAL SERVICES. THEY ARE PAID FOR WITH TAXPAYER DOLLARS AND OBVIOUSLY YOU HAVE SEEN, IT'S AN EXHIBIT, IT HAS MANY TERMS. BUT ONE OF THE -- CERTAINLY THE CITY DISAGREES WITH CATHOLIC SOCIAL SERVICES AS TO WHETHER THE CONTRACT REQUIRES THEM TO RECRUIT AND CERTIFY FOSTER PARENTS. I THINK IF YOU READ THE CONTRACT AND AS WE HAVE EXPLAINED IN OUR BRIEFS, IT IS PART OF THEIR SCOPE OF SERVICES. AND WE BELIEVE IT IS PART OF THEIR SCOPE OF SERVICES AND PART OF THE OVERALL COMPENSATION STRUCTURE. THE COMMONWEALTH OF PENNSYLVANIA SETS THE CRITERIA FOR EVALUATING PROSPECTIVE FOSTER FAMILIES, AND NONE OF THESE CRITERIA ARE RELIGIOUS IN NATURE.

ANOTHER PROVISION OF OUR CONTRACT IS THAT

-- AND IT'S CLEARLY SET FORTH IN THE CONTRACT, IS THAT ALL FAMILIES MUST BE TREATED EQUALLY UNDER THE -- AND WITH NO DISCRIMINATION. I HAVE HEARD ALL KINDS OF EFFORTS TO MINIMIZE THE REFERENCES TO THE FAIR PRACTICES ORDINANCE IN THE CONTRACT AND I WILL GET TO THAT IN A SECOND, BUT THE NONDISCRIMINATION PROVISIONS IN THE CONTRACT ARE PUT THERE FOR A REASON. IT IS NOT SOMETHING THAT -- YOU KNOW, I HAVE HEARD A LOT OF ARGUMENT OF WELL, NO ONE HAS EVER TRIED TO APPLY THIS, HERE IS -- WE HAVE NOT CALLED EVERY ONE OF OUR CONTRACTORS TO ASK WHETHER THEY ARE COMPLYING WITH IT. IT'S A PROVISION OF THE CONTRACT. WE HAVE A RIGHT TO EXPECT THAT WHEN OUR CONTRACTOR SIGN A CONTRACT THAT THEY ARE DOING WHAT THEY SAY THEY ARE GOING TO DO AND HAVE OBLIGED THEMSELVES TO DO UNLESS WE FIND OUT TO THE CONTRARY. AND IN THIS CASE, IT WAS ONLY WHEN THE INQUIRER ARTICLE CAME OUT AND IN THE AFTERMATH OF THE INQUIRER ARTICLE THROUGH INQUIRIES, CATHOLIC SOCIAL SERVICES CLEARLY STATED THAT IT WOULD NOT BE ABLE TO COMPLY WITH THAT PROVISION THAT WAS IN THE CONTRACT.

AND SO AT THAT POINT, YOU KNOW, WE REACHED THE DECISION THAT THE CONTRACT IS COMING TO AN END, AND IT LOOKS AS IF THEY ARE NOT GOING TO BE ABLE TO ENTER INTO A NEW ONE AND MAKE THE DECISION TO SIGN WHEN WE BOTH KNOW THAT THIS IS VERY IMPORTANT AND A DEAL

BREAKER TO THE CITY.

I WANT TO GO TO THE PUBLIC ACCOMMODATION ARGUMENT WHICH I'VE HEARD A LOT ABOUT, AND I THINK THIS IS MOSTLY ANOTHER RED HERRING AND I WILL EXPLAIN WHY. WE DON'T HAVE TO PARSE THE FAIR PRACTICES ORDINANCE AND ALL OF ITS APPLICATIONS. ALTHOUGH WE DO TAKE THE POSITION THAT RECRUITING AND SELECTING AND SUPPORTING FOSTER PARENTS IS A SERVICE, AND A SERVICE IS INCLUDED IN THE FAIR PRACTICES ORDINANCE. AND THERE IS NO EXCEPTION IN THE FAIR PRACTICES ORDINANCE FOR PRIVATE BUSINESSES, SO WE THINK THAT IT DOES APPLY. BUT THE NEW CONTRACTS THAT WILL BE -- THAT HAVE BEEN EXTENDED TO -- THE FULL CONTRACTS TO THE AGENCIES WITH WHICH WE ARE WORKING ON FULL RENEWALS, AND THE FULL CONTRACT CONSISTENTLY THAT WE WOULD BE OFFERING TO CATHOLIC SOCIAL SERVICES, AS THERE WAS TESTIMONY, CLARIFY THAT THE CONTRACT OBLIGATION IS NOT TO DISCRIMINATE AGAINST ANY OF THE PROTECTED CATEGORIES UNDER THE FAIR PRACTICES ORDINANCE FOR THE LENGTH OF THE NEW CONTRACT. AND SO WHETHER OR NOT, YOU KNOW, JUST STANDING ALONE EVERY DEFINITION OF THE FAIR PRACTICES ORDINANCE IS MET, WHICH WE THINK IT IS, BUT WE HAVE MADE IT CLEAR THAT IN THE UPCOMING CONTRACT AND IN THE CONTRACT GOING FORWARD THAT THERE CAN BE NO DISCRIMINATION ON THE BASIS OF SEXUAL ORIENTATION.

AND I HAVE ALSO HEARD A LOT ABOUT, YOU KNOW, FOSTER CARE BEING -- YOU KNOW, WHETHER FOSTER CARE IS A SERVICE OR NOT, I GUESS. THE PARTS THAT ARE OF CONCERN TO US ARE REFUSALS TO DEAL AND REFUSALS TO CERTIFY IN A NONDISCRIMINATORY WAY. THESE ARE THE CLASSIC PIECES OF AN ANTIDISCRIMINATION LAW. AND SO THE DHS WITNESSES TESTIFIED VERY CLEARLY AND EXTENSIVELY THAT IT IS THE CHOICE OF THE FOSTER PARENT TO BE -- TO CHOOSE THE FOSTER SERVICE PROVIDER. THEY CAN RECEIVE INFORMATION, BUT IT IS THEIR ULTIMATE CHOICE. AND THE DISCRIMINATION PROBLEM COMES INTO PLAY WHEN THE FOSTER CARE AGENCY REFUSES TO DEAL WITH THEM. THAT IS THE SAME TYPE -- IN CONCEPT, THE SAME TYPE OF DISCRIMINATION OF REFUSING TO SELL SOMEBODY SOMETHING, REFUSING TO PROVIDE A SERVICE FOR THEM, ANOTHER KIND OF SERVICE. YOU ARE SAYING, YOU NEEDN'T APPLY HERE, WE ARE NOT HERE FOR YOU. WE THINK THAT IS CLEARLY COVERED BY OUR ANTIDISCRIMINATION LAW AND POLICY. AGAIN, TO CERTIFY IS TO FOLLOW THE STATE CERTIFICATION REQUIREMENTS AND TO -- WHICH ARE DIRECTED AT WHETHER OR NOT A FAMILY IS GOING TO BE ABLE TO BE A NURTURING CARETAKER AND TO RENDER A DECISION ON THAT BASIS.

I ALSO HEARD A LOT OF CROSS EXAMINATION THAT SEEM TO BE ATTEMPTING TO ESTABLISH SECULAR EXEMPTIONS. I WOULD JUST LIKE TO SAY THAT THE ONLY

RELEVANT QUESTION UNDER THE EXEMPTION CASES IS WHETHER DHS RECOGNIZED SECULAR EXEMPTIONS THAT UNDERMINE THE SAME PURPOSES TO THE SAME DEGREE AS THE RELIGIOUS EXEMPTION THAT CATHOLIC SEEKS. AND THE ANSWER IS THAT THE ONES THAT CATHOLIC TRIED TO ESTABLISH ON CROSS DEALT WITH THINGS LIKE PROXIMITY OR LANGUAGE OR SPECIAL MEDICAL NEEDS. ACTUALLY, AS I SAID, DEPUTY COMMISSIONER ALI REJECTED ALL OF THESE AS BEING EVEN EXEMPTIONS AT ALL BECAUSE SHE SAID IT HAS TO BE THE APPLICANTS WHO CHOOSE. BUT ALL OF THOSE RELATE TO LOOKING OUT FOR THE BEST INTEREST OF CHILDREN. NONE OF THOSE REASONS UNDERMINE OUR ANTIDISCRIMINATION LAWS OR POLICIES. AND THUS CASES SUCH AS BLACKHAWK AND LIGHTHOUSE, WHICH WE ARE ASSUMING THEY ARE TRYING TO MAKE AN EXEMPTION ARGUMENT UNDER, DON'T APPLY.

BUT THE BIGGEST FAILURE ON THE MERITS THAT REALLY NEEDS TO BE DISCUSSED IS WE MAINTAIN THAT THE CITY -- THAT CSS WAS UNABLE TO DEMONSTRATE THE SUBSTANTIAL BURDEN ON RELIGIOUS PRACTICE WHICH THEY CLAIM OUR CONTRACT IMPOSES. JIM AMATO DID TESTIFY THAT SAME-SEX MARRIAGE IS AGAINST CATHOLIC DOCTRINE. BUT THAT TESTIMONY DOES NOT IN ITSELF ARTICULATE A CONFLICT BETWEEN THAT RELIGIOUS BELIEF AND THE CONTRACT OBLIGATION THAT WE BELIEVED THAT CATHOLIC WAS PERFORMING NOT TO DISCRIMINATE AND TO EVALUATE ALL APPLICANTS

EQUALLY. BECAUSE THE CONTRACT DOES NOT REQUIRE CATHOLIC OR THE CATHOLIC CHURCH TO RECOGNIZE ANY MARRIAGE IN ORDER TO CERTIFY FOSTER PARENTS. SO THE MERE FACT OF -- THAT SAME-SEX MARRIAGE IS AGAINST CATHOLIC DOCTRINE DOES NOT MEAN THAT CSS CAN'T DO ITS JOB OF EVALUATING APPLICANTS FAIRLY UNDER THE STATE CRITERIA. THE COURT DOES NOT HAVE TO BLINDLY ACCEPT THAT THERE IS A CONFLICT. IT IS ENTITLED TO EXAMINE THE CONTRACT AND TO SEE IF THERE ACTUALLY IS A CONFLICT THAT WOULD REQUIRE CSS TO REQUIRE -- TO RECOGNIZE SAME-SEX MARRIAGES. WE SUBMIT YOU WON'T FIND THAT.

MR. AMATO ALSO TESTIFIED THAT CERTIFYING A SAME-SEX COUPLE'S HOME WOULD SOMEHOW BE WHAT HE CALLED I BELIEVE A VALIDATION OF THE COUPLE'S RELATIONSHIP. AGAIN, WE MAINTAIN THAT THE CONTRACT AND THE STATE REQUIREMENTS DON'T REQUIRE CSS TO VALIDATE OR AFFIRM ANY RELATIONSHIP. THE CRITERIA ARE DIRECTED TOWARD ASSESSING THE APPLICANT'S ABILITY TO NURTURE A CHILD. SO, FOR EXAMPLE, IF YOU HAVE A COUPLE AND THE RELATIONSHIP IS THAT THEY ARE AT EACH OTHER'S THROATS CONSTANTLY DURING THE HOME STUDY, YOU MIGHT SAY THIS IS NOT A RELATIONSHIP THAT BODES WELL FOR THEM BEING A CARETAKER OF A CHILD. BUT WHETHER THEY ARE MARRIED OR IN A SINGLE SEX RELATIONSHIP DOES NOT HAVE TO BE VALIDATED OR AFFIRMED.

AND AS A MATTER OF LAW, I DIRECT THE COURT TO CASES SUCH AS THE HARRIS FUNERAL HOME CASE IN THE 6TH CIRCUIT WHICH EXPRESSLY HELD THAT SIMPLY COMPLYING WITH AN ANTIDISCRIMINATION STATUTE DOES NOT AS A MATTER OF LAW REQUIRE -- IS NOT THE SAME THING AS A VALIDATION OR ENDORSEMENT. THAT CASE, BY THE WAY, ALSO SPEAKS TO ANOTHER OF MR. RIENZI'S POINTS WHICH IS WHETHER OR NOT WE ARE DEALING WITH A COMPELLING STATE INTEREST AND A NARROWLY-TAILORED MEANS OF ADDRESSING IT. OUR POSITION IS THAT WE NEVER GET TO THAT BECAUSE THE SUBSTANTIAL BURDEN IS NOT ESTABLISHED. BUT IF FOR ANY REASON WE EVER GET TO THE STRICT SCRUTINY ANALYSIS, THERE ARE MANY CASES. THE HARRIS FUNERAL HOME IS ONE. IN ANOTHER CONTEXT WE HAVE THE SUPREME COURT'S DECISION IN THE ROBERTS VERSUS THE JAYCEES. THEY ALL RECOGNIZE THAT ANTIDISCRIMINATION STATUTES DO FURTHER A COMPELLING GOVERNMENTAL INTEREST, AN EXTREMELY IMPORTANT COMPELLING GOVERNMENTAL INTEREST. AND I AM NOT SURE WHICH ONE OF THOSE CASES USES THIS LANGUAGE. THEY BOTH AGREE THAT ENFORCEMENT OF AN ANTIDISCRIMINATION STATUTE IS THE LEAST RESTRICTIVE MEANS OF FURTHERING THE INTEREST. ONE OF THE CASES SAYS THAT IT'S THE PRECISE WAY TO FURTHER THE GOVERNMENTAL INTEREST.

GOING BACK TO THE SUBSTANTIAL BURDEN FOR A SECOND, MR. AMATO ALSO STATED THAT CATHOLIC TEACHING

WAS -- THAT WHAT HE CALLED THE LIFESTYLE REPRESENTED BY A SAME-SEX COUPLE WAS UNACCEPTABLE IN PARENTING, PRESUMABLY MEANING CATHOLIC WOULD CONSIDER ALL SAME-SEX COUPLES TO BE UNFIT TO FOSTER PARENT. BUT THEY OFFERED NO EVIDENCE THAT A GAY MARRIED COUPLE COULD NOT BE EXCELLENT NURTURING CARETAKER. THAT'S WHY NOTHING LIKE THAT IS IN THE STATE CRITERIA AND THAT IS WHAT EMPIRICAL RESEARCH SHOWS IS THE CASE. THE DEPARTMENT OF HUMAN SERVICES IS ENTITLED TO RELY UPON SUCH RESEARCH WHEN IT SETS ITS CONTRACTUAL REQUIREMENTS FOR HOW IT WANTS THIS PART OF THE JOB DONE, AND THE CITY IS ENTITLED TO OUTLAW DISCRIMINATORY CONDUCT WHICH IS ROOTED IN DISAPPROVAL OF THE LIFESTYLE OF A PROTECTED GROUP.

SO WHILE CSS DID NOT ESTABLISH A SUBSTANTIAL BURDEN, MR. AMATO'S TESTIMONY DID CLEARLY SHOW THAT CATHOLIC WAS INSERTING PURELY RELIGIOUS CRITERIA INTO THE SECULAR CRITERIA ESTABLISHED BY THE STATE. HE TESTIFIED THAT CATHOLIC WOULD CERTIFY NEITHER SAME-SEX COUPLES NOR UNMARRIED HETEROSEXUAL COUPLES ON RELIGIOUS GROUNDS. BUT THEN, WHICH WAS -- AND I THINK YOU HEARD TESTIMONY FROM THE COMMISSIONER TODAY, NEW TO DHS AND THE CITY ON TUESDAY AFTERNOON HE DESCRIBED YET ANOTHER RELIGIOUS REQUIREMENT THAT CSS HAD INTERPOSED INTO THE CERTIFICATION PROCESS, THAT CATHOLIC WOULD NOT CERTIFY A FOSTER FAMILY UNLESS THE APPLICANTS COULD

PRODUCE A, QUOTE, PASTORAL LETTER, UNQUOTE, FROM A CLERGY MEMBER THAT ATTESTED THAT THE APPLICANTS ACTIVELY PARTICIPATED IN RELIGIOUS SERVICES. THIS FURTHER COMPLICATES CATHOLIC'S ABILITY TO COMPLY WITH THE CITY'S CONTRACT IN THAT, I THINK ARTICLE 15, THAT SAME SECTION THAT DEALS WITH THE FAIR PRACTICES ORDINANCE, THERE IS ACTUALLY AN EARLIER SENTENCE THAT COMPLETELY MAKES IT CLEAR THAT THERE CAN BE NO DISCRIMINATION ON THE BASIS OF RELIGION. BUT WE NOW HAVE A NEW PROBLEM IN ADDITION TO THE PROBLEM WHICH BROUGHT US HERE WHICH COMPLICATES THE ABILITY OF CATHOLIC SOCIAL SERVICES TO COMPLY WITH THE CITY'S CONTRACT. NEITHER THE CITY NOR ITS CONTRACTORS CAN IMPOSE A RELIGIOUS TEST OR DISCRIMINATE ON THE BASIS OF RELIGION AND DENY CERTIFICATION SOLELY BECAUSE AN APPLICANT CAN'T PRODUCE A LETTER ATTESTING THAT HE OR SHE IS A BELIEVER VERSUS A NONBELIEVER, OR IT SEEMED FROM THE TESTIMONY THEY COULD BE A BELIEVER BUT NOT AN ACTIVE CHURCH-GOER AND WOULD BE UNABLE TO GET THAT LETTER. THIS RAISES NEW CONSTITUTIONAL PROBLEMS FOR THE CITY AND FOR -- POTENTIALLY FOR CSS.

AND LASTLY I HEARD MR. RIENZI -- HE MADE AN ARGUMENT THAT BY -- THAT WE WERE COMPELLING SPEECH AND THEREBY VIOLATING FIRST AMENDMENT SPEECH RIGHTS OF CATHOLIC SOCIAL SERVICES IN ADDITION TO THE RELIGIOUS FREE EXERCISE AND RFRA CLAIMS. BUT THE KEY POINT WITH

REGARD TO COMPELLED SPEECH CASES IS THAT THE GOVERNMENT CAN'T RESTRICT SPEECH THAT IS OUTSIDE OF THE PROGRAM THAT HAS BEEN ENTERED INTO. WHEN THE RESTRICTION APPLIES TO THE PROGRAM ACTIVITIES THEMSELVES, WHICH THE PARTY HAS ENTERED INTO VOLUNTARILY, LIKE A CONTRACT, THAT SPEECH CAN BE REGULATED. WE THINK IT IS CLEAR HERE THAT THE CERTIFICATION PROCESS, THE RECRUITMENT PROCESS IS SQUARELY WITHIN THE CONTRACT BETWEEN THE CITY AND CATHOLIC, AND THAT THEREFORE THE COMPELLED SPEECH LINE OF CASES HAS NO APPLICABILITY.

FINALLY, I WANT TO TALK ABOUT THE REMAINING ISSUES WITH RESPECT TO THE ISSUANCE OF AN INJUNCTION, AND ALL OF THOSE MILITATE AGAINST ITS ISSUANCE WITH REGARD TO PUBLIC FACTORS AND THE -- WHAT THE EFFECT OF AN INJUNCTION WOULD BE. DHS IS OBLIGATED TO ACT IN THE BEST INTEREST OF 6,000 OR MORE CHILDREN, 6,000 IN FOSTER CARE AND 10,000 TOTAL FOR WHOM IT HAS CUSTODIAL RESPONSIBILITY. AND AS THE COMMISSIONER AND DEPUTY COMMISSIONER ALI TESTIFIED, THAT REQUIRES THEM -- THEY HAVE MADE THE DECISION THAT THEY NEED TO KEEP INTAKE CLOSED UNLESS OR UNTIL CATHOLIC SOCIAL SERVICES CAN SIGN A FULL CONTRACT, THAT IT CANNOT PERMIT FOSTER CARE AGENCY CONTRACTORS TO DISCRIMINATE IN WAYS THAT WILL DEPRESS BADLY-NEEDED DIVERSITY OF FOSTER CARE FAMILIES AND DHS'S RESULTING ABILITY TO DETERMINE THE

BEST FIT FOR EACH CHILD WHO COMES INTO PLACEMENT. AS THE TESTIMONY -- AS I HEARD THE TESTIMONY, I THINK THE COMMISSIONER TESTIFIED CHILDREN ARE NOT WIDGETS. YOU DON'T JUST ONE COMES IN AND YOU SAY, OH, THERE'S AN OPEN HOME, THEY GO IN. THEY HAVE PARTICULAR NEEDS AND THERE IS A PARTICULAR NEED WITHIN THE CITY AND IN DHS TO HAVE AS MANY DIFFERENT KINDS OF FOSTER CARE FAMILIES AND TO MAKE THEM FEEL WELCOME SO THAT THE BEST FIT FOR THE CHILDREN CAN BE MADE.

DHS CANNOT PERMIT ITS CONTRACTOR AGENCIES TO SEND MESSAGES THAT WOULD HARM POTENTIAL APPLICANTS WHO FEAR BEING STIGMATIZED AND HUMILIATED, AND THESE ARE PEOPLE WHO HAVE BEEN SUBJECT OFTEN TO SOME STIGMATIZATION AND HUMILIATION. THEY MAY WELL BE DETERRED AND NOT WANT TO GO THROUGH THAT AGAIN.

ALSO THERE IS A POTENTIAL THAT IT COULD HARM -- THE MESSAGE WOULD BE THAT, YOU KNOW, SOME APPLICANTS NEED NOT APPLY. AND THE CITY SHOULD BE ABLE TO ENFORCE ITS WELL-ESTABLISHED ANTIDISCRIMINATION LAWS AND POLICIES. THE CITY OF PHILADELPHIA AND THE FAIR PRACTICES ORDINANCE AND ASSOCIATED POLICIES HAVE BEEN IN EFFECT FOR DECADES. THIS IS NOT SOMETHING NEW.

SO FOR THIS COURT TO ORDER ANYTHING BEYOND WHAT DHS IS ALREADY DOING, WHICH IS MAKING PLACEMENTS WITH CATHOLIC WHEN CASE-SPECIFIC FACTORS SUCH

AS SIBLING PLACEMENTS ARE IN THE BEST INTEREST OF THOSE CHILDREN, WOULD ACT TO UNDERMINE DHS'S DETERMINATIONS AND TO HARM THE CITY'S DECADES-LONG EFFORTS TO BATTLE DISCRIMINATION. THIS WOULD IRREPARABLY HARM THE CITY AND IS NOT IN THE PUBLIC INTEREST. IN ADDITION, AN INJUNCTION HERE WOULD NOT RESTORE THE STATUS QUO. THE CURRENT CONTRACT, WHICH APPARENTLY CATHOLIC SOCIAL SERVICES WANTS TO EXTEND OVER THE EXPIRATION DATE, DOES ACTUALLY NOT REQUIRE US TO PROVIDE ANY INTAKE OR SPECIFIC NUMBERS OF CHILDREN TO ANY AGENCY, TO CSS. CSS IS ACTUALLY ASKING OR SEEKING TO FORCE THE CITY TO ENTER INTO -- TO EITHER EXTEND A CONTRACT WITH TERMS THAT ARE NOT IN THERE OR TO ENTER INTO A NEW CONTRACT ON TERMS WHICH THE CITY HAS REJECTED AS TO ANY OTHER CONTRACTOR AGENCY.

AND FINALLY, AN INJUNCTION WOULD PUT THE CITY IN THE POSITION OF KNOWINGLY PROVIDING FOSTER CARE SERVICES WITH RELIGIOUS CRITERIA, INCLUDING CATHOLIC SOCIAL SERVICES' ADMITTED NOW USE OF PASTORAL LETTERS WHICH RAISE ADDITIONAL CONSTITUTIONAL ISSUES, SO THAT EVEN IF THE CLAIMS WHICH UNDERLIE THEIR MOTION FOR PRELIMINARY INJUNCTION AND TRO WOULD BE RULED UPON BY THIS COURT, THERE ARE NEW ISSUES WHICH WOULD CAUSE US TO BE UNABLE TO CONTRACT WITH THEM.

GIVE ME A SECOND, YOUR HONOR.

JUST ONE MORE -- I NOTED DURING MR. RIENZI'S ARGUMENT THAT HE SEEMED TO BE ARGUING THAT THERE WAS NO PROBLEM IF THERE WERE NO COMPLAINTS. THE CONTRACT OBLIGATION NOT TO DISCRIMINATE, CATHOLIC SOCIAL SERVICES HAS TOLD US IT CANNOT COMPLY WITH THAT. DISCRIMINATION IS NOT OKAY BASED ON THE NUMBER OR LACK OF NUMBER OF COMPLAINTS.

BUT FOR ALL THESE REASONS, BECAUSE CATHOLIC SOCIAL SERVICES HAS NOT BEEN ABLE TO MEET ANY OF THE PRONGS OF THE INJUNCTION STANDARD, THE CITY RESPECTFULLY REQUESTS THAT ITS MOTION BE DENIED. BUT I HAVE ONE LAST REQUEST, WHICH IS THAT BECAUSE THE CITY JUST BECAME AWARE OF THAT PASTORAL LETTER REQUIREMENT ON TUESDAY, IT HAD NOT BEEN PART OF OUR PRIOR BRIEFING. IF THE COURT FEELS IT WOULD BE HELPFUL AS TO THE ADDITIONAL PROBLEMS WHICH WE BELIEVE THIS REQUIREMENT RAISES, WE HAVE PREPARED A VERY SHORT LETTER BRIEF WHICH WE WOULD BE HAPPY TO HAND TO THE COURT, IF THE COURT DESIRES.

THE COURT: OKAY. YOU CAN HAND IT UP.

MS. EWING: THANK YOU. THANK YOU, YOUR HONOR.

THE COURT: THANK YOU.

MR. RIENZI: YOUR HONOR, IS IT ME OR IS IT THE ACLU NEXT?

THE COURT: THE ACLU IS NEXT.

MR. RIENZI: THAT'S WHAT I THOUGHT.

MS. COOPER: GOOD AFTERNOON, YOUR HONOR.

THE COURT: GOOD AFTERNOON.

MS. COOPER: AND THANK YOU FOR THE OPPORTUNITY TO BE HEARD.

PLAINTIFFS ARE ASKING THE COURT TO ISSUE AN EXTRAORDINARY RULING OF LAW. THEY ARE ASKING THE COURT TO HOLD THAT AN ORGANIZATION THAT ENTERS INTO A CONTRACT WITH THE GOVERNMENT TO PROVIDE A GOVERNMENT SERVICE HAS A RIGHT TO THEN ALTER THAT PROVISION OF -- THE PROVISION OF THAT PUBLIC SERVICE TO CONFORM TO ITS RELIGIOUS BELIEFS. LIKE MANY PUBLIC CHILD WELFARE SYSTEMS AROUND THE COUNTRY, THE CITY HAS CHOSEN TO MAXIMIZE CHILDREN'S FAMILY PLACEMENT OPTIONS BY BARRING DISCRIMINATION BASED ON RACE, RELIGION, SEXUAL ORIENTATION AND OTHER CHARACTERISTICS THAT HAVE NO BEARING ON ONE'S ABILITY TO CARE FOR A CHILD.

CSS' RELIGIOUS BELIEFS DO NOT ENTITLE IT TO ACCEPT THE CITY CONTRACTS AND TAXPAYER DOLLARS TO PERFORM SOME CHILD WELFARE SERVICES ON BEHALF OF THE CITY AND THEN COMMANDEER THE SYSTEM TO IMPOSE ITS OWN STANDARDS. THE POTENTIAL CONSEQUENCES OF SUCH A RULING ARE PRETTY STAGGERING. JUST THINK, WHAT IF THERE WERE AN AGENCY THAT HELD A RELIGIOUS BELIEF THAT CHILDREN MUST BE SUBJECTED TO CORPORAL PUNISHMENT THAT VIOLATES

STATE CHILD ABUSE LAWS. THERE ARE PLENTY OF RELIGIOUS FAITHS WITH BELIEFS ABOUT THAT. WHAT IF THERE WERE A RELIGIOUS AGENCY THAT HAD A RELIGIOUS OBJECTION TO PROVIDING MEDICAL TREATMENT TO CHILDREN WHO ARE INJURED OR SICK. THE IMPLICATIONS OF THE LEGAL RULING THAT PLAINTIFFS ARE ASKING FOR CANNOT BE CONFINED TO RELIGIOUS-BASED OBJECTIONS TO SAME-SEX COUPLES, BECAUSE UNDER THE ESTABLISHMENT CLAUSE, THE GOVERNMENT AND THE COURTS CANNOT GIVE PREFERENCE TO SOME RELIGIOUS BELIEFS OTHER OTHERS. YOU CAN'T SAY, THIS RELIGIOUS BELIEF WE WILL DEFER TO AND APPROVE, THIS RELIGIOUS BELIEF WE ARE NOT GOING TO GIVE YOU THE SAME TREATMENT.

THE FACT THAT PLAINTIFFS ARE ASKING THE COURT TO ORDER THE CITY TO ALLOW THIS KIND OF FREE REIN BY RELIGIOUSLY-AFFILIATED CONTRACT AGENCIES DEMONSTRATES A PROFOUND MISUNDERSTANDING OF THE RIGHT TO FREE EXERCISE OF RELIGION. THE RIGHT TO FREE EXERCISE PROTECTS AGAINST GOVERNMENT INTERFERENCE WITH RELIGIOUS INSTITUTIONS; PURSUIT OF THEIR OWN INTERESTS. THE SUPREME COURT SAID THAT VERY CLEARLY IN THE KIRYAS JOEL CASE. THE RIGHT TO FREE EXERCISE DOES NOT ESTABLISH A RIGHT TO HAVE THE GOVERNMENT CREATE OPPORTUNITIES FOR YOU TO EXERCISE YOUR RELIGION AND THEN FUND THOSE OPPORTUNITIES. INDEED, FUNDING RELIGIOUS ACTIVITIES DIRECTLY VIOLATES THE ESTABLISHMENT CLAUSE, AS I WILL

DISCUSS IN A FEW MOMENTS.

IN THE BRIEFING, THE PLAINTIFFS RELY ON, I BELIEVE, TRINITY LUTHERAN, AND THAT'S A CASE THAT IS OFTEN MISCHARACTERIZED IN THIS KIND OF DISCOURSE AROUND THESE ISSUES. THIS CASE DOES NOT SUPPORT THE EXTRAORDINARY CLAIM PLAINTIFFS MAKE HERE. IT ESTABLISHES FOR SURE THAT THE GOVERNMENT COULD NOT DISQUALIFY RELIGIOUS ORGANIZATIONS FROM A PUBLIC BENEFIT BECAUSE OF THEIR RELIGIOUS IDENTITY. BUT EVEN IF A GOVERNMENT CONTRACT TO PERFORM A GOVERNMENT SERVICE COULD BE CONSIDERED A PUBLIC BENEFIT, WHICH OF COURSE IT IS NOT, AS SOME CASES IN OUR BRIEF MAKE CLEAR, BUT EVEN ASSUMING IT WERE, THE CITY HAS NOT DENIED CSS A CONTRACT OR REFERRALS OF CHILDREN BECAUSE IT IS CATHOLIC OR EVEN BECAUSE IT HOLDS RELIGIOUS BELIEFS. THE CITY SUSPENDED REFERRALS BECAUSE OF CSS' REFUSAL TO COMPLY WITH ITS NONDISCRIMINATION REQUIREMENT. TRINITY LUTHERAN IN NO WAY SUGGESTS THAT A CONTRACT AGENCY'S RELIGIOUS BELIEFS GIVE IT THE RIGHT TO DICTATE HOW IT PROVIDES GOVERNMENT-CONTRACTED SERVICES.

BUT ALSO I WANT TO ADDRESS VERY BRIEFLY THE SPEECH CLAIM, AND I JUST HAVE A VERY SMALL AMOUNT TO ADD TO WHAT THE CITY HAD TO SAY ABOUT THAT. BUT THE AGENCY FOR INTERNATIONAL DEVELOPMENT CASE IS VERY CLEAR IN DISTINGUISHING BETWEEN SPEECH THAT IS PART OF THE

SCOPE OF THE CONTRACT, AND WHEN THE GOVERNMENT LEVERAGES A CONTRACT TO TRY TO PROHIBIT SPEECH THAT AN ENTITY ENGAGES IN OUTSIDE THE SCOPE OF THE CONTRACT. JUST BECAUSE -- I THINK IF PHILADELPHIA WERE TO TELL CATHOLIC SOCIAL SERVICES THAT IT COULD NOT ENGAGE IN SPEECH IN OTHER DOMAINS, THAT WOULD BE A CONSTITUTIONAL PROBLEM AND WE WOULD BE STANDING WITH THEM ON THAT FOR SURE. BUT THE SPEECH THEY ARE TALKING ABOUT, PROVIDING HOME STUDIES AND CERTIFICATIONS OF FOSTER PARENTS, THAT IS PRECISELY WHAT THE CONTRACT IS ABOUT.

NOW, I DON'T THINK WE HEARD FROM THE PLAINTIFFS ABOUT REALLY THE OTHER MAJOR PROBLEM WITH THEIR THEORY, WHICH IS THE ESTABLISHMENT CLAUSE. THE FIRST AMENDMENT DOES HAVE TWO PARTS, AND THE OTHER -- OR AT LEAST ABOUT RELIGION, AND THE OTHER PART IS THE ESTABLISHMENT CLAUSE. AND SO NOT ONLY DOES THE CITY HAVE NO LEGAL OBLIGATION TO PERMIT ITS CONTRACT AGENCIES TO IMPOSE RELIGIOUS ELIGIBILITY CRITERIA ON PROSPECTIVE FOSTER PARENTS, IF IT DID SO, THE CITY ITSELF WOULD BE VIOLATING THE ESTABLISHMENT CLAUSE. THE ESTABLISHMENT CLAUSE PROHIBITS THE USE OF RELIGIOUS ELIGIBILITY CRITERIA IN THE PROVISION OF GOVERNMENT SERVICES, WHETHER THAT SERVICE IS PROVIDED BY GOVERNMENT EMPLOYEES THEMSELVES, DHS EMPLOYEES, OR ORGANIZATIONS CONTRACTED BY THE GOVERNMENT TO PERFORM THAT GOVERNMENT FUNCTION.

THE PHILADELPHIA DEPARTMENT OF HUMAN SERVICES COULD CERTAINLY NOT SCREEN OUT PROSPECTIVE FOSTER FAMILIES BASED ON FAILURE TO MEET A RELIGIOUS TEST. IT COULD NOT SAY ONLY CHRISTIANS OR ONLY JEWS, CANNOT SAY NO SAME-SEX COUPLES BECAUSE OF OUR RELIGIOUS OBJECTION. THEREFORE, THE AGENCY THAT HIRES AND PAYS WITH TAXPAYER DOLLARS TO PERFORM THIS VERY SERVICE THAT IS A GOVERNMENT FUNCTION CANNOT DO SO EITHER.

AND THE SUPREME COURT MADE CRYSTAL CLEAR IN THE LARKIN CASE AND THE KIRYAS JOEL THAT THE ESTABLISHMENT CLAUSE PROHIBITS THE GOVERNMENT FROM DELEGATING A GOVERNMENT FUNCTION TO A PRIVATE ENTITY AND THEN ALLOWING THAT GOVERNMENT FUNCTION TO BE PERFORMED USING RELIGIOUS CRITERIA.

IN ADDITION, THERE IS THE FUNDING ISSUE I TOUCHED ON EARLIER. THE SUPREME COURT HAS MADE ABSOLUTELY CLEAR IN CASE AFTER CASE THAT THE ESTABLISHMENT CLAUSE BARS THE GOVERNMENT FUNDING OF RELIGIOUS ACTIVITY. HERE, ALLOWING THE USE OF RELIGIOUS CRITERIA IN THE SCREENING OF PROSPECTIVE FOSTER PARENTS, WHICH IS A GOVERNMENT FUNCTION, AGAIN UNDER CONTRACT WITH THE STATE TO PERFORM THIS GOVERNMENT FUNCTION, THAT IS RELIGIOUS ACTIVITY. AND I WOULD JUST POINT TO THE BOWEN V. KENDRICK CASE WHERE THE SUPREME COURT RECOGNIZED THAT ALLOWING RELIGIOUS-BASED DISCRIMINATION

BY A GOVERNMENT-FUNDED SERVICE PROVIDER WOULD BE ONE FORM OF IMPERMISSIBLY ADVANCING RELIGION.

THERE IS A THIRD REASON WHY ALLOWING CONTRACT AGENCIES TO USE RELIGIOUS CRITERIA IN THE FOSTER LICENSING PROCESS WOULD VIOLATE THE ESTABLISHMENT CLAUSE, AND THAT THERE IS A LINE OF SUPREME COURT CASES THAT SAYS THAT WHEN THE GOVERNMENT PREFERENCES RELIGION TO THE DETRIMENT OF OTHERS, TO THE DETRIMENT OF THIRD PARTIES, THAT'S A VIOLATION OF THE ESTABLISHMENT CLAUSE, AND I WOULD POINT THE COURT TO THE ESTATE OF THORNTON AS A SEMINAL CASE ON THAT POINT. HERE, ACCEPTING PLAINTIFF'S POSITION WOULD CAUSE SIGNIFICANT HARM TO THE CHILDREN IN THE CHILD WELFARE SYSTEM BY DEPRIVING THEM OF GOOD FAMILIES AND CAUSE HARM TO THE WOULD-BE FAMILIES WHO SEEK TO CARE FOR THEM.

PLAINTIFFS WILL LIKELY SAY THIS IS A QUESTION OF RELIGIOUS ACCOMMODATION, IF THEY COME BACK UP AGAIN. AND, YOU KNOW, THERE ARE LOTS OF ACCOMMODATION CASES IN THE SUPREME COURT AND OTHER COURTS. BUT THIS IS NOT RELIGIOUS ACCOMMODATION. THE CASES LIKE AMIS AND HOSANNA TABOR, THOSE CASES INVOLVE ACCOMMODATING RELIGIOUS ORGANIZATIONS TO GET EXEMPTIONS FROM GENERALLY-APPLICABLE LAWS THAT APPLY TO EVERYBODY IN THEIR OWN PRIVATE ACTIVITIES.

THIS IS NOT ABOUT ACCOMMODATION. THIS IS

ABOUT A CASE -- THIS IS A CASE IN WHICH THEY ARE ASKING FOR THE GOVERNMENT TO DELEGATE THIS GOVERNMENT FUNCTION TO THIS ORGANIZATION, AND FOR THE GOVERNMENT TO THEN ALLOW THEM TO PROVIDE THOSE GOVERNMENT SERVICES USING RELIGIOUS CRITERIA, AND THAT IS ABSOLUTELY WHAT THE ESTABLISHMENT CLAUSE PROHIBITS.

TURNING BACK TO THE HARMS THAT WOULD RESULT, THOSE ALSO GO TO THE BALANCE OF EQUITIES, OF COURSE, AND A FURTHER REASON WHY THE REQUESTED TRO AND PI SHOULD BE DENIED. AND IN FACT, IT IS THESE VERY HARMS THAT CAUSED PROPOSED INTERVENORS OF MAKING TO -- TO SEEK TO PARTICIPATE IN THIS CASE. ALLOWING DISCRIMINATION BY AGENCIES THAT HAVE RELIGIOUS OBJECTIONS TO SAME-SEX COUPLES WOULD HARM THE AT-RISK CHILDREN THAT THE FOSTER CARE SYSTEM IS MEANT TO PROTECT AS WELL AS THE FAMILIES WHO WOULD CARE FOR THEM, AND THESE HARMS ARE VERY MUCH INTERTWINED. STARTING WITH THE FAMILIES, JUST TO SORT OF UNPACK IT A LITTLE BIT.

THE FAMILIES CAN BE HARMED IN A VARIETY OF WAYS. STARTING WITH THOSE WHO MAYBE GO TO -- WOULD GO TO CATHOLIC SOCIAL SERVICES OR ANY LIKE-MINDED AGENCIES IF THE COURT WERE TO RULE IN THEIR FAVOR. THOSE PEOPLE COULD BE SUBJECT TO DISCRIMINATION, AND THE SUPREME COURT IN HEART OF ATLANTA AND OTHER CASES HAS RECOGNIZED THE DEGRADATION AND THE HUMILIATION AND

EMBARRASSMENT THAT CAN COME WITH DISCRIMINATION. THIS IS A SERIOUS HARM THAT THE SUPREME COURT HAS RECOGNIZED. AND THAT DEGRADATION, THE DEGRADATION OF THAT KIND OF EXPERIENCE IS NOT LESSENED BY THE FACT THAT THE DISCRIMINATION IS DONE POLITELY OR THAT IT IS CALLED A, QUOTE, REFERRAL. "WE WILL NOT SERVE YOUR KIND" IS A DEGRADING HUMILIATING EXPERIENCE THAT THE CITY CLEARLY HAS A COMPELLING INTEREST IN WANTING TO PREVENT.

IN ADDITION, ALL PROSPECTIVE FOSTER PARENTS HEADED BY A SAME-SEX COUPLE WOULD FACE THE UNCERTAINTY ABOUT WHETHER THEY WOULD FACE DISCRIMINATION IN THE PROCESS, MAKING IT MORE DIFFICULT, STRESSFUL. IF THE COURT WERE TO ACCEPT PLAINTIFFS' POSITION AND THE LGBT COMMUNITY WERE TO LEARN THAT IN PHILADELPHIA, PURSUING FOSTER PARENTING COMES WITH THE RISK OF EXPOSURE TO LAWFUL DISCRIMINATION AGAINST THEM. AND A RULE OF LAW WOULD SAY, AGENCIES ARE LAWFULLY ENTITLED TO DISCRIMINATE AGAINST LGBT OR PEOPLE OF SAME-SEX COUPLES, IT IS HARD TO FATHOM HOW MANY PEOPLE COULD BE DETERRED FROM SUBJECTING THEMSELVES TO THAT PROCESS, KNOWING THAT IT IS PERFECTLY LEGAL TO DISCRIMINATE AGAINST THEM IN THE PROCESS.

FINALLY ON THIS TOPIC, EVEN IF THERE WERE CLARITY ABOUT WHICH AGENCIES DISCRIMINATE AND SOME COUPLES WERE WELL-ENOUGH INFORMED TO AVOID THE AGENCIES

THAT WOULD NOT ACCEPT THEM, THAT MEANS THAT SAME-SEX COUPLE FAMILIES OR PROSPECTIVE FAMILIES HEADED BY SAME-SEX COUPLES GET A REDUCED CHOICE OF AGENCY OPTIONS. THE PLAINTIFFS TALK A LOT ABOUT 28 AGENCIES AVAILABLE, WHAT IS THE BIG DEAL. THERE ARE 28 OTHER AGENCIES AVAILABLE. IMAGINE A SCHEME IN WHICH YOU HAD A SYSTEM WHERE SAY CHRISTIANS GET THE CHOICE OF 30 AGENCIES AND EVERYBODY ELSE GETS 28, OR WHITE PEOPLE GET 30 AGENCIES, AFRICAN AMERICANS HAVE TO SETTLE FOR FEWER OPTIONS. THAT IS A STIGMATIZING SYSTEM FOR THE CITY TO IMPOSE ON ITS POPULATION.

ALSO, PUT ASIDE THE STIGMA, THE REDUCED OPTIONS WOULD MEAN THAT SOME FAMILIES WOULD NOT BE ABLE TO WORK WITH THE AGENCY AMONG THE EXISTING AGENCIES THAT MIGHT BE MOST APPROPRIATE FOR THEM. THE PLAINTIFFS EMPHASIZED THAT -- PARTICULARLY THE INDIVIDUAL PLAINTIFFS, THAT THE SERVICES OF CSS ARE SO OUTSTANDING THAT THEY ARE NOT SURE THAT THEY WOULD CONTINUE FOSTERING IF THEY COULD NOT WORK WITH CSS, EVEN IF THAT MEANT CEASING TO CARE FOR THE CHILDREN THEY OBVIOUSLY LOVE. YET PLAINTIFFS' POSITION IS THAT SAME-SEX COUPLES SHOULD NOT BE ABLE TO BENEFIT FROM THOSE SERVICES AND INSTEAD SHOULD HAVE TO ACCEPT AGENCIES THAT ARE COMPLETELY UNACCEPTABLE TO INDIVIDUAL PLAINTIFFS.

IN ADDITION, WE HEARD TESTIMONY ABOUT HOW

DIFFERENT AGENCIES HAVE DIFFERENT EXPERTISE IN TERMS OF THE CHILDREN THAT THEY CARE FOR. SO IF IT HAPPENED TO BE A FAITH-BASED AGENCY OBJECTING TO SAME-SEX COUPLES OR -- LET'S PUT IN ANY OTHER SUBSTITUTE GROUP, BECAUSE OF COURSE A RULING HERE WOULD REPLY TO ANY RELIGIOUS-BASED OBJECTION TO ANY GROUP, SO AN AGENCY THAT HAD A RELIGIOUS-BASED OBJECTION TO INTERRACIAL COUPLES OR TO X, Y, Z GROUPS, SAME-SEX COUPLES. IF THAT AGENCY HAPPENED TO BE ONE OF THE AGENCIES THAT SPECIALIZES IN MEDICALLY NEEDY CHILDREN, I FORGET THE PARTICULAR TERMINOLOGY, THAT WOULD MEAN THAT A FAMILY IN THAT GROUP, THE INTERRACIAL COUPLE OR THE SAME-SEX COUPLE WHO WANTED TO CARE FOR A MEDICALLY NEEDY CHILD, PERHAPS THEY ARE DOCTORS OR NURSES, WOULD NOT HAVE THE OPTION OF WORKING WITH THAT AGENCY. SO THERE WAS A LOT OF TALK OF THE CHILDREN NOT BEING WIDGETS AND FUNGIBLE, WHICH IS ABSOLUTELY -- I AGREE WITH THAT. ALSO THE AGENCIES ARE NOT NECESSARILY FUNGIBLE. SO GIVING A MENU OF OPTIONS FOR HETEROSEXUAL COUPLES AND A REDUCED SET OF OPTIONS FOR SAME-SEX COUPLES IS HARMFUL, AGAIN FOR THE STIGMA REASON AND FOR THE PRACTICAL REASON.

TURNING TO THE INTEREST OF THE CHILDREN, TURNING AWAY QUALIFIED FOSTER PARENTS BASED ON RELIGIOUS CRITERIA CONFLICTS WITH THE PROFESSIONAL AND ACCEPTED CHILD WELFARE PRACTICE STANDARDS THAT EXIST TO PROTECT

CHILDREN. AND I WOULD REFER THE COURT TO THE CHILD WELFARE LEAGUE OF AMERICA STANDARDS OF EXCELLENCE AND ADOPTION, I BELIEVE FOSTER CARE PRACTICE AS WELL. BECAUSE EACH CHILD'S NEEDS ARE UNIQUE, MEETING THE BEST INTEREST OF A PARTICULAR CHILD MEANS HAVING AS LARGE AND AS DIVERSE A POOL OF QUALIFIED LICENSED FAMILIES AS POSSIBLE TO OPTIMIZE THAT FIT THAT WE HAVE HEARD SOME DISCUSSION ABOUT BETWEEN CHILD AND FAMILY. ESPECIALLY GIVEN THE CURRENT NEED FOR MORE QUALIFIED FAMILIES FOR OLDER YOUTH AND LGBT YOUTH AND PERHAPS OTHER GROUPS, IT IS CONTRARY TO THE INTEREST OF PHILADELPHIA FOSTER CHILDREN FOR THE CITY'S CONTRACTING AGENCIES TO REFUSE TO ACCEPT QUALIFIED PARENTS FOR REASONS THAT ARE UNRELATED ON THE BEST INTEREST OF THE CHILDREN. AND TO REFUSE TO PLACE CHILDREN WITH A CLASS OF FAMILIES THAT MAY JUST INCLUDE THAT FAMILY THAT IS BEST SITUATED OR PERHAPS THE ONLY FAMILY THAT IS AVAILABLE, READY, WILLING AND ABLE TO MEET THE NEEDS OF A PARTICULAR CHILD. IF SAME-SEX COUPLES ARE TURNED AWAY BY CSS AND ANY OTHER LIKE-MINDED AGENCIES, OR DETERRED FROM PURSUING FOSTERING ALTOGETHER BECAUSE THEY KNOW THAT AGENCIES ARE PERMITTED TO DISCRIMINATE AGAINST THEM AND THEY PERHAPS DON'T WANT TO TAKE THAT RISK, CHILDREN LOSE OUT ON GOOD FAMILIES.

IT IS ALSO IMPORTANT TO RECOGNIZE THAT --

AND I TOUCHED ON THIS EARLIER, THAT IF CSS IS ENTITLED TO REFUSE TO ACCEPT SAME-SEX COUPLES BECAUSE OF ITS RELIGIOUS BELIEFS ABOUT MARRIAGE, THEN ALL FAITH-BASED AGENCIES WILL BE ABLE TO TURN AWAY PROSPECTIVE FAMILIES WHO FAIL TO CONFORM TO ANY OF THEIR RELIGIOUS BELIEFS. AGAIN, THE ESTABLISHMENT CLAUSE PROHIBITS PREFERENCING SOME RELIGIOUS BELIEFS OVER OTHERS. SO SOME DENOMINATIONS DON'T VIEW MARRIAGES BETWEEN PEOPLE OF DIFFERENT FAITHS AS A VALID UNION. SOME DON'T RECOGNIZE SECOND MARRIAGES AFTER DIVORCE. A RELIGIOUS-AFFILIATED AGENCY MIGHT OBJECT TO FOSTER PARENTS WHO WORK ON THE SABBATH AS DEFINED BY THE AGENCY, OR WHO EAT PORK OR WHO ALLOW THEIR CHILDREN TO ATTEND PUBLIC SCHOOLS. AND AGAIN, AS WE LEARNED IN THE HEARINGS THIS WEEK, THAT CSS ITSELF HAS OTHER RELIGIOUS-BASED OBJECTIONS. NO UNMARRIED COUPLES OF ANY SEXUAL ORIENTATION AND NO ONE WHO IS NOT A CHURCH-GOER ABLE TO SECURE A CLERGY LETTER. REQUIRING THE CITY TO ALLOW EACH FOSTER CARE AGENCY TO IMPLEMENT ITS OWN RELIGIOUS CRITERIA FOR FOSTER FAMILIES COULD RESULT IN A PATCHWORK OF SUCH EXCLUSIONS, CREATING EVEN MORE BARRIERS TO FINDING FAMILIES FOR CHILDREN WHO NEED THEM. SO THE CHILDREN'S INTEREST IN GETTING MORE FAMILIES WEIGHS DECIDEDLY AGAINST GRANTING THE REQUESTED RELIEF.

BUT IN ADDITION, AGAIN AS I TOUCHED ON

EARLIER, IT'S NOT AGENCY CERTIFIED. THE RISK OF A RULING FOR THE PLAINTIFFS NOT ONLY COMPROMISES THE CITY'S ABILITY TO MAXIMIZE FAMILY OPTIONS FOR CHILDREN, IT ALSO OPENS THE DOOR TO GIVING AGENCIES CARTE BLANCHE TO IMPOSE ON CHILDREN WHO ARE WARDS OF THE GOVERNMENT A DENIAL OF SERVICES, MEDICAL SERVICES, NO SCHOOL. WHATEVER THEIR RELIGIOUS BELIEF MIGHT MEAN. AGAIN CORPORAL PUNISHMENT THAT -- BASED ON A BIBLICAL VIEW THAT MAY VIOLATE STATE CHILD ABUSE LAWS, IT WOULD OPEN UP THE DOOR TO ALLOWING AN UNLIMITED NUMBER OF POTENTIAL HARMS TO CHILDREN.

I WANT TO TOUCH VERY BRIEFLY ON WHAT IS FELT TO BE PERHAPS A SUGGESTION BY PLAINTIFFS' COUNSEL THAT THE CITY'S KNOWLEDGE THAT CSS HAS RELIGIOUS BELIEFS ABOUT MARRIAGE MEANS THAT -- OR THIS IS HOW I UNDERSTOOD IT, ANYWAY -- MEANS THAT THE CITY WAS AWARE ALL ALONG THAT CSS PUT THOSE RELIGIOUS BELIEFS ABOVE THE PROFESSIONAL ESTABLISHED CHILD WELFARE STANDARDS OF ACCEPTING ALL QUALIFIED FAMILIES TO GIVE CHILDREN THE BEST ARRAY OF PLACEMENT OPTIONS. THERE IS NO BASIS FOR THIS ASSUMPTION. THERE ARE NUMEROUS FAITH-BASED AGENCIES THAT HOLD RELIGIOUS BELIEFS ABOUT MARRIAGE AND HOLD LOTS OF RELIGIOUS BELIEFS THAT MAY BE RELEVANT. BUT THEY KNOW THAT THEY PUT THE CHILD WELFARE PROFESSIONAL STANDARDS AND THE INTEREST OF CHILDREN

FIRST. INDEED, AS WE HEARD IN THIS CASE, BETHANY CHRISTIAN SERVICES, WHICH APPARENTLY HAS SIMILAR RELIGIOUS BELIEFS ABOUT MARRIAGE AS CSS, APPARENTLY IS WILLING TO COMPLY WITH THE TERMS OF THE NONDISCRIMINATION REQUIREMENT.

I DO WANT TO SAY JUST A FEW WORDS ABOUT PLAINTIFFS' RELIANCE ON THE MASTERPIECE CAKESHOP CASE. TO SUPPORT IT, THEY ARGUE THAT THAT SUPPORTS ITS CONTENTION THAT THE CITY'S ENFORCEMENT OF ITS NONDISCRIMINATION REQUIREMENT WAS BASED ON HOSTILITY TOWARDS CSS' RELIGIOUS BELIEFS. NONE OF THE EVIDENCE THE PLAINTIFFS CLAIM SUPPORT THIS ACCUSATION CREATES ANY INFERENCE THAT THE CITY'S ENFORCEMENT WAS BASED ON ANTIRELIGIOUS ANIMUS AS OPPOSED TO A DESIRE TO ENSURE THAT ALL PROSPECTIVE FAMILIES ARE WELCOMED. THEY DISTORT THE MASTERPIECE RULING BEYOND RECOGNITION. JUST TO GIVE SOME EXAMPLES, THERE IS SIMPLY NOTHING HOSTILE TO RELIGION ABOUT THE STATEMENT THAT QUOTE, WE CANNOT USE TAXPAYER DOLLARS TO FUND ORGANIZATIONS THAT DISCRIMINATE AGAINST PEOPLE BECAUSE OF THEIR SEXUAL ORIENTATION OR SAME-SEX MARRIAGE STATUS, IT'S NOT RIGHT. THAT WAS AN EXAMPLE OF A STATEMENT THAT THEY DEEMED HOSTILE TO RELIGION. IF MERE DISAGREEMENT WITH PERMITTING GOVERNMENT FUNDING OF DISCRIMINATION CONSTITUTES IMPERMISSIBLE HOSTILITY TOWARDS RELIGION,

THAT WOULD PRECLUDE ANY ENFORCEMENT OF NONDISCRIMINATION REQUIREMENTS AGAINST GOVERNMENT CONTRACTORS WHO REFUSE TO COMPLY BASED ON RELIGIOUS OBJECTIONS. MASTERPIECE DID NOT SAY THIS.

NOR DOES THE CITY'S STATEMENT THAT QUOTE, WE WOULD NOT ALLOW SUCH DISCRIMINATION AGAINST, FOR EXAMPLE, CATHOLIC COUPLES OR MIXED RACE COUPLES AND WE CANNOT ALLOW IT WITH RESPECT TO SAME-SEX COUPLES EITHER CONSTITUTE HOSTILITY TOWARDS RELIGION. MASTERPIECE DOES NOT MEAN THAT REFERENCING OTHER FORMS OF DISCRIMINATION IN THE CONTEXT OF A DISCUSSION ABOUT RELIGIOUSLY-MOTIVATED SEXUAL ORIENTATION DISCRIMINATION IMPERMISSIBLY SHOWS HOSTILITY TOWARDS RELIGION. INDEED, THE MASTERPIECE CASE ITSELF, IN THAT CASE ITSELF THE COURT CITED PIGGIE PARK, ONE OF THE MOST FAMOUS RACE DISCRIMINATION CASES IN THE COUNTRY, FOR THE PROPOSITION THAT RELIGIOUS OBJECTIONS GENERALLY, QUOTE, DO NOT ALLOW BUSINESS OWNERS AND OTHER ACTORS IN THE ECONOMY AND IN SOCIETY TO DENY PROTECTED PERSONS EQUAL ACCESS TO GOODS AND SERVICES UNDER A NEUTRAL AND GENERALLY-APPLICABLE PUBLIC ACCOMMODATION CLAUSE. SO UTTERING RACE DISCRIMINATION IN THE SAME BREATH AS SEXUAL ORIENTATION DISCRIMINATION OR OTHER FORMS OF DISCRIMINATION DOES NOT AMOUNT TO HOSTILITY TOWARDS RELIGION.

INTERESTINGLY, THOUGH, PLAINTIFFS'

PROTEST OF THIS STATEMENT FROM THE CITY AS, QUOTE, COMPARING CSS RELIGIOUS BELIEFS TO RACIST DISCRIMINATION, CLOSE QUOTE, SEEMS TO BE AN ACKNOWLEDGMENT, AS I READ IT, THAT IT WOULD BE IMPROPER TO ALLOW RELIGIOUSLY-AFFILIATED AGENCIES TO EXCLUDE PROSPECTIVE FAMILIES BASED ON A RELIGIOUS OBJECTION TO SAY INTERRACIAL COUPLES. YET THEY SEEM TO BE SUGGESTING THAT THEIR RELIGIOUS BELIEFS ABOUT WHO SHOULD BE FOSTER PARENTS DESERVES THE CITY'S APPROVAL AND DEFERENCE. BUT, OF COURSE, AGAIN, THE ESTABLISHMENT CLAUSE DOES NOT ALLOW THAT PICKING AND CHOOSING.

AND THE COMMENTS FROM THE MAYOR FROM SEVERAL YEARS AGO, YOU KNOW, THAT THAT SOMEHOW YOU CAN DOT THAT -- CONNECT THE DOTS TO SAY THAT THAT DEMONSTRATES THE CITY'S DECISION IN 2018 TO ENFORCE THIS CONTRACT DEMONSTRATES HOSTILITY TOWARDS CSS'S FAITH. MASTERPIECE DOES NOT SUPPORT THAT GIANT LEAP. IN THAT CASE THEY WERE TALKING ABOUT THE ADJUDICATIVE STATEMENT FROM A MEMBER OF THE ADJUDICATIVE BODY THAT WAS CHARGED WITH HEARING A DISCRIMINATION COMPLAINT. THE COURT IN NO WAY SUGGESTED THAT HAD COLORADO OFFICIALS EVER EXPRESSED DISAGREEMENT WITH THE LEADERSHIP OF THE BUSINESS OWNER'S FAITH COMMUNITY THAT ENFORCEMENT OF STATE LAWS AGAINST THE BUSINESS OWNER OR ANY ORGANIZATIONS AFFILIATED WITH HIS FAITH WOULD BE FOREVER

ASSUMED TO BE BASED ON HOSTILITY TOWARD FAITH.

I JUST HAVE A BIT MORE, IF THE COURT WILL INDULGE. I FEEL COMPELLED TO DISCUSS THE PLAINTIFFS' USE OF THE "REFERRALS" TERMINOLOGY. THEY SEEM TO BE ATTEMPTING TO SHOEHORN THIS CASE INTO LUKUMI TO CLAIM SELECTIVE ENFORCEMENT BY CITING THE FACT THAT AGENCIES MAY REFER FAMILIES TO OTHER AGENCIES THAT HAVE SPECIAL EXPERTISE. THESE ARE NOT EXEMPTIONS FROM THE CITY'S NONDISCRIMINATION REQUIREMENT. THEY ARE COMPARING APPLES TO ORANGES. USING THE NOMENCLATURE "REFERRAL" DOES NOT MAKE THE REFUSAL TO ACCEPT SAME-SEX COUPLES ANY LESS DISCRIMINATORY. THEY ARE USING SMOKE AND MIRRORS WITH THIS REFERRAL LANGUAGE TO MAKE DISCRIMINATION APPEAR BENEVOLENT TOWARDS THE FAMILIES DISCRIMINATED AGAINST UNDER THEIR POLICY.

CSS IS NOT SIMPLY ADVISING PROSPECTIVE PARENTS THAT OTHER AGENCIES MAY BE A BETTER FIT FOR THEM OR MAY, YOU KNOW, GIVE THEM A CHOICE OF OTHER AGENCIES. THEY ARE REFUSING SERVICE TO SAME-SEX COUPLES, PERIOD. I THINK IF AN AGENCY HAD A POLICY OF REFUSING TO ACCEPT INTERRACIAL COUPLES OR NONCHRISTIANS, I THINK EVEN PLAINTIFFS WOULD AGREE THAT THIS IS DISCRIMINATION EVEN IF THE AGENCY REFERRED THOSE FAMILIES TO OTHER AGENCIES POLITELY AND REFUSED TO SERVE THEM.

ONE LAST THING THAT WAS JUST MENTIONED IN

THE CROSS EXAMINATION. PLAINTIFFS SEEM TO BE IMPLYING THAT THE CITY'S REFUSAL TO ALLOW THE USE OF THE RELIGIOUS ELIGIBILITY CRITERIA IN ITS PUBLIC CHILD WELFARE SYSTEM TO EXCLUDE SAME-SEX COUPLES VIOLATES FEDERAL LAW. THAT WAS SORT OF HOW I WAS INTERPRETING THE LINE OF CROSS. AND I JUST WANT TO MAKE CLEAR THAT THERE IS NO FEDERAL LAW OR REGULATION THAT REQUIRES STATES TO PERMIT FAITH-BASED AGENCIES TO DICTATE THE TERMS OF GOVERNMENT SERVICES PROVIDED. INDEED, THE FEDERAL STATUTE THAT REQUIRES EQUAL TREATMENT OF FAITH-BASED SERVICE PROVIDERS THAT PARTICIPATE IN PROVIDING SERVICES AND GOVERNMENT PROGRAMS. SPECIFICALLY, I AM GOING TO READ THE LANGUAGE FROM THAT BECAUSE IT MAKES QUITE CLEAR THAT IT DOES NOT ALLOW THIS OR REQUIRE IT. IT SAYS HERE -- AND THIS IS 42 USC 290KK-1. RELIGIOUS ORGANIZATIONS ARE ELIGIBLE TO BE PROGRAM PARTICIPANTS ON THE SAME BASIS AS ANY OTHER NONPROFIT PRIVATE ORGANIZATION AS LONG AS THE PROGRAMS ARE IMPLEMENTED CONSISTENT WITH THE ESTABLISHMENT CLAUSE AND THE FREE EXERCISE CLAUSE OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION.

AND THIS IS -- I WANT TO CALL THE COURT'S ATTENTION TO THE NEXT LINE. NOTHING IN THIS CHAPTER SHALL BE CONSTRUED TO RESTRICT THE ABILITY OF THE FEDERAL GOVERNMENT OR A STATE OR LOCAL GOVERNMENT IN

RECEIVING FUNDS UNDER SUCH PROGRAMS TO APPLY TO RELIGIOUS ORGANIZATIONS. THE SAME ELIGIBILITY CONDITIONS IN DESIGNATED PROGRAMS THAT ARE APPLIED TO ANY OTHER NONPROFIT PRIVATE ORGANIZATION. IN OTHER WORDS, WHEN RELIGIOUS ORGANIZATIONS ENTER INTO GOVERNMENT CONTRACTS, THE GOVERNMENT IS NOT REQUIRED TO TAILOR THEIR CONTRACT OR THEIR SERVICES TO MEET THE RELIGIOUS NEEDS OF THE AGENCY.

AGAIN, I JUST WANT TO -- ACTUALLY, YOU KNOW WHAT, I AM GOING TO STOP THERE BECAUSE I HAVE BEEN SPEAKING LONG ENOUGH AND JUST SEE IF THE COURT HAS ANY QUESTIONS FOR ME.

THE COURT: I HAVE NO QUESTIONS.

MS. COOPER: THANK YOU.

THE COURT: THANK YOU.

MR. RIENZI: LET ME START WHERE THE PARTIES AND THE AMICUS AGREE, KIDS ARE NOT WIDGETS. THAT'S GREAT, WE AGREE. KIDS SHOULD BE PLACED IN HOMES THAT SERVE THEIR BEST INTEREST. EVERYBODY AGREES. I THINK EVERYBODY ACTUALLY SAID A VERSION OF THIS ONE, AS MANY DIFFERENT KINDS OF FOSTER FAMILIES AS POSSIBLE IS GOOD FOR KIDS. WE AGREE. THE QUESTION IS, ARE YOU GOING TO GET THERE IF YOU HAVE A GOVERNMENT-IMPOSED LITMUS TEST THAT SAYS PEOPLE -- ORGANIZATIONS WITH CERTAIN RELIGIOUS BELIEFS CAN'T PARTICIPATE IN THE

SYSTEM, RIGHT. SO THE ALTERNATIVE -- I THOUGHT IT WAS FASCINATING, THE ACLU IS TALKING ABOUT WELL, CATHOLIC SEEMS LIKE A GOOD AGENCY. WE OUGHT TO MAKE THAT AVAILABLE FOR EVERYBODY.

THAT'S NOT SOMETHING THAT IS ON THE TABLE IN THE CASE. WHAT IS ON THE TABLE IN THE CASE IS, ARE THEY GOING TO GET SHUT DOWN OR NOT, RIGHT? SO THE ACLU'S REQUESTED RELIEF IS NOT EXPAND CATHOLIC, THAT'S NOT SOMETHING THE GOVERNMENT CAN DO. IT IS SHUT DOWN CATHOLIC BECAUSE CATHOLIC SHOULD NOT BE AVAILABLE TO ANYBODY, RIGHT. SO I THOUGHT COMMISSIONER FIGUEROA ACTUALLY SAID IT BEST, WHETHER CATHOLIC WINS THE CASE OR DOESN'T WIN THE CASE, THERE'S 28 AGENCIES AVAILABLE IN THIS CITY WHO WILL CERTIFY SAME-SEX FAMILIES.

COUNSEL FOR THE ACLU TALKED A LOT ABOUT ESTABLISHMENT CLAUSE CONCERNS, ABOUT WHAT HAPPENS WHEN THE GOVERNMENT DELEGATES ITS FUNCTIONS TO A RELIGIOUS ENTITY. HERE IS WHY THAT ARGUMENT MISSES THE MARK IN THIS CASE. CERTIFICATIONS OF FAMILIES FOR FOSTER CARE ARE NOT THE CITY'S FUNCTION TO DELEGATE. IT'S JUST NOT THE CITY'S FUNCTION. COMMISSIONER FIGUEROA SAID THAT, THEIR DOCUMENTS SAY THAT. THEIR DOCUMENTS ALSO MAKE CLEAR THAT IN NO WAY IS CATHOLIC THE AGENT OF THE CITY. THOSE ARE THE TERMS OF THE CONTRACT. SO IT'S NOT THE CITY'S FUNCTION TO DELEGATE.

AND THEY CAN'T BE VIOLATING THE ESTABLISHMENT CLAUSE SIMPLY BY ALLOWING CATHOLIC TO DO WHAT CATHOLIC HAS DONE LONG BEFORE THE CITY WAS INVOLVED IN THIS LINE OF WORK, WHICH IS CATHOLIC BRINGS IN FAMILIES THAT CATHOLIC BRINGS TO THE TABLE AND THINKS ARE GOOD TO BRING TO THE TABLE. IF WE WANT A WORLD WHERE WE HAVE AS MANY FOSTER FAMILIES AS POSSIBLE, ANOTHER THING I THINK EVERYBODY HAS SAID TODAY, WANT AS MANY FOSTER FAMILIES AS POSSIBLE, WELL, DIFFERENT GROUPS CAN REACH DIFFERENT COMMUNITIES BETTER. AND SAYING THAT WE ARE GOING TO SHUT THE DOOR AND WE ARE GOING TO SAY CATHOLIC CAN'T DO IT BECAUSE CATHOLIC DOESN'T SAY THEY ARE IN FAVOR OF EACH AND EVERY FAMILY MAKES NO SENSE. IT'S CONTRARY TO THE INTEREST THAT CITY SAYS IT IS PURSUING.

THERE WAS A REFERENCE TO THE ALLIANCE FOR AN OPEN SOCIETY CASE, AOC V. AID, WHICH TALKED ABOUT HOW THE GOVERNMENT IS NOT PERMITTED TO REQUIRE SPEECH OUTSIDE OF WHAT IT'S CONTRACTING FOR. WHEN IT'S PAYING FOR SOMETHING, THE GOVERNMENT IS ALLOWED TO SAY, HEY, I PAID YOU FOR THAT, SAY IT MY WAY. WHEN IT'S NOT PAYING FOR SOMETHING, THEY DON'T GET TO USE THE FACT THAT THEY ARE PAYING YOU OVER HERE TO MAKE YOU ENGAGE IN SPEECH OVER THERE.

THAT'S PRECISELY WHAT IS GOING ON HERE.

THEY DON'T PAY ANYBODY A PENNY FOR HOME STUDIES. AND THEY CERTAINLY DON'T PAY ANYBODY A PENNY WHO STEPS ASIDE FROM HOME STUDIES. YOU DON'T DRAW A CHECK FROM THE GOVERNMENT WHEN YOU SAY, ACTUALLY I CAN'T DO THAT ONE. SO THEY DON'T PAY A PENNY, IT'S OUTSIDE OF WHAT THEY ARE PAYING FOR. AOC ACTUALLY QUITE CLEARLY DICTATES THAT THE PLAINTIFFS HAVE A VALID COMPELLED SPEECH CLAIM.

THERE WERE ARGUMENTS ABOUT THIRD PARTY HARMS AND HOW THE CLAIM BASED ON THE THORNTON CASE THAT WHERE THERE ARE THIRD PARTY HARMS THE RELIGIOUS PARTY HAS TO LOSE BECAUSE THE ESTABLISHMENT CLAUSE SAYS SO. HERE IS THE EASY WAY TO KNOW THAT THAT'S NOT RIGHT. HOSANNA TABOR V. EEOC, A NINE-NOTHING DECISION FROM THE SUPREME COURT ON BOTH FREE EXERCISE AND ESTABLISHMENT CLAUSE GROUNDS SAYING THAT THE GOVERNMENT COULD NOT APPLY AN OTHERWISE VALID NONDISCRIMINATION LAW, DISCRIMINATION AGAINST THE DISABLED. THE GOVERNMENT COULD NOT APPLY THAT OTHERWISE VALID NONDISCRIMINATION LAW AGAINST A CHURCH, A CHURCH SCHOOL. HOBBY LOBBY ALSO REJECTS THE ARGUMENT THAT ANY BURDEN ON THIRD PARTIES CREATES AN ESTABLISHMENT CLAUSE PROBLEM.

AND IF WE NEEDED ANYTHING FRESHER, WE COULD JUST GO BACK TO MASTERPIECE FROM FIVE MINUTES AGO, RIGHT, OR TWO WEEKS AGO. HERE IS THE SUPREME COURT, THE SEVEN JUSTICES IN THE MAJORITY, AND THIS IS NOT WHEN

THEY ARE TALKING ABOUT -- NOT WHEN THEY ARE TALKING ABOUT THE COMMISSION, THEY ARE JUST TALKING GENERALLY. WHEN IT COMES TO WEDDINGS, IT CAN BE ASSUMED THAT A MEMBER OF THE CLERGY WHO OBJECTS TO GAY MARRIAGE ON MORAL AND RELIGIOUS GROUNDS COULD NOT BE COMPELLED TO PERFORM THE CEREMONY WITHOUT DENIAL OF HIS OR HER RIGHT TO THE FREE EXERCISE OF RELIGION. THAT WAS THE EASY CASE ACCORDING TO SEVEN JUSTICES EARLIER THIS MONTH. IT'S JUST LIKE THIS CASE. MARRIAGE IS BOTH A RELIGIOUS EVENT AND ALSO A CIVIL CONTRACT. YOU HAVE TO GET A GOVERNMENT LICENSE TO GET MARRIED. THE GOVERNMENT REGULATES MARRIAGE. IN SOME WAYS IT'S A GOVERNMENT FUNCTION.

IF THE ARGUMENTS FROM THE ACLU AND THE CITY WERE CORRECT, THEN THE SUPREME COURT HAS TO BE WRONG, BECAUSE THEN YOU CAN'T HAVE THE GOVERNMENT ALLOWING RELIGIOUS GROUPS TO HAVE THEIR DIFFERENT RELIGIOUS BELIEFS ON SOMETHING LIKE SEX AND MARRIAGE WHILE STILL DOING STUFF THAT SOMEHOW INVOLVES THE GOVERNMENT. YET THE COURT SAID IT WAS EASY BECAUSE IT IS EASY. BECAUSE OUR LAWS DO NOT GIVE THE GOVERNMENT THE ABILITY TO DICTATE THE ONE AND ONLY CORRECT ANSWER TO COMPLICATED QUESTIONS LIKE SEX AND MARRIAGE. IT'S A FREE COUNTRY, PEOPLE HAVE LOTS OF DIFFERENT BELIEFS. THE SUPREME COURT REPEATEDLY -- THEY SAID IT IN

OBERGEFELL, THEY SAID IT AGAIN IN MASTERPIECE, HAS MADE CLEAR THAT WE NEED TO BE ABLE TO LIVE TOGETHER WITH A DIVERSITY OF DIFFERENT BELIEFS AND THAT THE GOVERNMENT CAN'T BE IN THE POSITION OF PUNISHING THE QUOTE UNQUOTE WRONG SET OF BELIEFS.

THERE WAS A LOT OF TALK ABOUT THE HARM THAT WOULD OCCUR, THE STIGMA, I THINK WAS MENTIONED A FEW TIMES, THE HARM AND THE STIGMA THAT WOULD OCCUR IF THE GOVERNMENT WERE TO ALLOW CATHOLIC TO CONTINUE OPERATING ACCORDING TO ITS RELIGIOUS BELIEFS. FIRST, AGAIN, THAT'S NOT A WINNING CONSTITUTIONAL ARGUMENT, SAYS MASTERPIECE, RIGHT. IF THAT WERE A WINNING CONSTITUTIONAL ARGUMENT, SEVEN JUSTICES COULD NOT SAY THAT THE CHURCH CAN SAY THEY WON'T DO GAY WEDDINGS, BECAUSE THEN THE GOVERNMENT WOULD BE ALLOWING A STIGMA IN A GOVERNMENT FUNCTION. THAT'S NOT WHAT THE LAW IS. IT'S NOT WHAT THE LAW IS.

BUT WE HEARD A LOT FROM THE CITY OVER THE PAST FEW DAYS ABOUT ALL OF THE EXCEPTIONS THEY HAVE GRANTED, ALL THE KIDS WHO THEY HAVE GONE AHEAD AND PLACED IN FAMILIES THROUGH CATHOLIC. AND I WOULD ASK, IF THEY HAVE SUCH A COMPELLING INTEREST, IF IT'S SUCH A COMPELLING IMPORTANT INTEREST TO NOT WORK WITH CATHOLIC, WELL THEN, WHY ARE THEY MAKING ALL OF THESE EXCEPTIONS? AND IF THE EXCEPTIONS ARE SO HARMFUL, IF IT'S SO

TERRIBLE FOR PEOPLE TO LIVE IN A WORLD WHERE WE DON'T ALL AGREE ABOUT RELIGION AND SEX AND MARRIAGE, THEN HOW COME PEOPLE HAVE NOT SUFFERED FROM THOSE EXCEPTIONS?

ANSWER, THEY HAVE NOT SUFFERED. THEY ARE ACTUALLY NOT HARMFUL. PEOPLE DISAGREE. I STRONGLY SUSPECT THAT A LOT OF THESE COUPLES HAVE DEEP DISAGREEMENTS WITH THE CATHOLIC CHURCH. AND IN AMERICA, THAT'S OKAY. IT'S OKAY FOR THE CATHOLICS TO SAY I DISAGREE WITH THE SAME-SEX COUPLE OVER THERE AND I THINK -- YOU KNOW, MY RELIGION SAYS YOU SHOULD DO IT DIFFERENTLY. IT'S OKAY FOR A LOT OF OTHER PEOPLE, INCLUDING COMMISSIONER FIGUEROA, TO HAVE DEEPLY-HELD BELIEFS THAT THE CATHOLIC CHURCH IS DEAD WRONG. IN A FREE COUNTRY THAT'S FINE. AND IN A FREE COUNTRY THAT SHOULD NOT BE DISQUALIFYING FOR EITHER GROUP AND FOR EITHER SIDE TO PARTICIPATE IN THE PUBLIC SPIRIT, PARTICULARLY TO DO SOMETHING THAT CATHOLIC IS PROVEN TO DO VERY WELL, WHICH IS HELP KIDS.

YOU HEARD ARGUMENT AGAIN ABOUT THE HARMS THAT WOULD OCCUR, AND I WOULD JUST REMIND THE COURT AGAIN, THERE IS NO EVIDENCE THAT ANYONE HAS EVEN ASKED FOR THE SERVICE. THERE IS NO EVIDENCE THAT ANYBODY HAS -- UNDER THE SUPREME COURT'S CASE BROWN V. ENTERTAINMENT MERCHANTS ASSOCIATION, THE GOVERNMENT IS NOT ALLOWED TO RELY ON AMBIGUOUS PROOF TO CARRY ITS COMPELLING INTEREST

BURDEN. IT ACTUALLY NEEDS TO HAVE REAL PROOF OF ACTUAL HARM.

AND I WAS DISAPPOINTED BEFORE WHEN WE SUDDENLY HAD A SURPRISE EXPERT WITNESS, BUT THE SURPRISE EXPERT WITNESS ENDED UP, TO HIS CREDIT, QUITE TRUTHFULLY SAYING, I DON'T KNOW, IT MIGHT BE HARMFUL. I THINK IT'S HARMFUL, BUT I DON'T REALLY KNOW. AND UNDER THE LAW, THE GOVERNMENT LOSES AT THAT POINT. UNDER THE LAW, THEY HAVE NOT CARRIED THEIR BURDEN WHEN THE ANSWER IS, I DON'T KNOW, I THINK SO BUT I CAN'T PROVE IT. THAT MEANS GOVERNMENT LOSES.

THERE WAS SOME DISCUSSION ABOUT THE CONTRACT AND THE PUBLIC ACCOMMODATIONS LANGUAGE IN THE CONTRACT. I WOULD POINT OUT AGAIN, THE GOVERNMENT SIMPLY DECLINED TO BRIEF THE QUESTION OF WHETHER THIS IS A PUBLIC ACCOMMODATION. THEY SEEM TO KEEP ASSUMING IT IS A PUBLIC ACCOMMODATION IN PART BECAUSE THE WORDS "PUBLIC ACCOMMODATION" APPEAR IN THE CONTRACT. I WOULD SIMPLY POINT OUT THAT THAT PARAGRAPH MAKES CLEAR THAT IT'S ABOUT A LOT OF DIFFERENT THINGS. IT TALKS ABOUT RESIDENTIAL AND REAL PROPERTY. THERE'S ANOTHER PARAGRAPH LATER IN SECTION 15 THAT TALKS ABOUT NOT GIVING THE GOVERNMENT GOODS THAT COME FROM NORTHERN IRELAND. THAT'S NOT BECAUSE THERE IS GOODS GOING ON IN THIS CONTRACT. THERE IS NO GOODS GOING ON IN THIS

CONTRACT. THAT'S BECAUSE THIS BOILERPLATE THAT APPEARS IN A MILLION CITY CONTRACTS, THAT'S WHY IT'S THIS THICK, IT DOES NOT PROVE THAT IT'S A PUBLIC ACCOMMODATION. AND AGAIN, I WOULD JUST SAY THE CITY'S OWN ACTIONS AND THE WAY FOSTER CARE IS DONE PROVE CONCLUSIVELY THAT IS NOT A PUBLIC ACCOMMODATION, IT WAS NEVER INTENDED TO BE ONE. THEY JUST NEEDED TO COME UP WITH AN ARGUMENT.

THE CITY SPOKE ABOUT CONTRACT RENEWAL AND SAID, WELL, THIS IS JUST A MATTER OF NOT RENEWING A CONTRACT. I WOULD SIMPLY POINT OUT THE GOVERNMENT DOES NOT GET TO STOP BEING THE GOVERNMENT BECAUSE THERE IS A CONTRACT INVOLVED. THE LAW IS ACTUALLY QUITE CLEAR THAT PEOPLE CONTRACTING WITH THE GOVERNMENT STILL HAVE THEIR FIRST AMENDMENT RIGHTS. THEY HAVE THE SAME FIRST AMENDMENT RIGHTS THAT AT-WILL EMPLOYEES OF THE GOVERNMENT HAVE. THAT'S CLEAR 3RD CIRCUIT LAW. SO THE GOVERNMENT DOES NOT JUST GET TO SAY, WELL, IT'S A CONTRACT, I DON'T HAVE TO WORRY ABOUT RESPECTING YOUR RELIGION OR I DON'T HAVE TO WORRY ABOUT NOT FORCING YOU TO SPEAK BECAUSE IT'S A CONTRACT. BECAUSE IT'S A CONTRACT IS NOT A FIRST AMENDMENT DEFENSE.

THE CITY, ACTUALLY, AS I UNDERSTOOD IT, WAS ALSO ARGUING THAT MAYBE CATHOLIC IS WRONG ABOUT ITS RELIGIOUS REQUIREMENTS. MAYBE THEY ARE WRONG WHEN THEY THINK THAT GOD DOES NOT WANT THEM TO FILL OUT THE

PAPERWORK AND CERTIFY THESE COUPLES. AND I WOULD SIMPLY SAY IT IS NOT FOR THE GOVERNMENT, NOR RESPECTFULLY FOR THE COURT, TO DECIDE WHAT CATHOLIC'S RELIGIOUS EXERCISE IS. THAT IS THEIR SINCERE RELIGIOUS EXERCISE. THERE IS NO SERIOUS CHALLENGE TO IT IN THE EVIDENCE. THAT'S THEIR RELIGIOUS EXERCISE. MAYBE THE CITY THINKS THEY ARE WRONG, BUT THE BOTTOM LINE IS THEIR SINCERE RELIGIOUS EXERCISE IS, I CAN'T SIGN THE FORM, I CAN'T DO THAT THING. IT IS NOT FOR THE CITY TO COME BACK AND TRY TO REDEFINE IT AND SAY, WE THINK YOU ARE WRONG. THAT IS JUST AS INAPPROPRIATE AS THE POPE FRANCIS DISCUSSION AT DHS. THAT'S FOR THE RELIGIOUS PEOPLE TO DECIDE, IT'S NOT FOR THE GOVERNMENT TO DECIDE.

LET ME END ON THE BALANCE OF HARMS ISSUE THAT HAS BEEN DISCUSSED. IT'S NOW REALLY CLEAR BECAUSE NOW WHEN -- I MEAN WE HAVE ACTUALLY HEARD FROM THE INTERVENOR ON THE WITNESS STAND, WE HAVE HEARD FROM INTERVENOR'S COUNSEL, WE'VE HEARD FROM THE CITY, THEY CAN'T FIND ANYBODY WHO WAS HARMED BY THE OLD SYSTEM, ZERO, THEY CAN'T FIND A SOUL. THAT OLD SYSTEM SO FAR AS WE ARE AWARE AND SO FAR AS THE EVIDENCE SHOWS, HURT NO ONE, NOT A SINGLE GAY COUPLE THAT COULDN'T GO BE A FOSTER PARENT IF THEY WANTED TO. NOT A SINGLE GAY COUPLE ACTUALLY TURNED AWAY BY CATHOLIC. THERE IS JUST NO EVIDENCE OF A SOUL WHO WAS HARMED. AND SO AS

COMMISSIONER FIGUEROA SAID, YOU HAVE GOT THE SAME NUMBER OF AGENCIES AVAILABLE EITHER WAY.

SO YOU HAVE GOT THIS HYPOTHETICAL CLAIM THAT SOMEBODY MIGHT BE INJURED, ALTHOUGH WE DON'T KNOW WHO AND WE HAVE GOT NO PROOF OF IT. BUT THAT'S THE GOVERNMENT'S ARGUMENT AGAINST THE STATUS QUO. BUT IN ORDER TO VINDICATE THAT ALLEGED INTEREST, THEY ARE WILLING TO DO REAL HARM TO REAL ACTUAL PEOPLE, BOTH THE AGENCY AND THE PARENTS AND THE KIDS. THEY ACKNOWLEDGE WE HAVE SOME OPEN CATHOLIC HOMES. WELL, THAT'S NOT JUST WORDS, RIGHT. SOME OPEN CATHOLIC HOMES IS BEDS AND FAMILIES WHERE FOSTER KIDS SHOULD BE SLEEPING RIGHT NOW. AND THE GOVERNMENT IS NOT LETTING THEM SLEEP THERE.

YOU HEARD FROM COMMISSIONER FIGUEROA THAT JUST LIKE THEY DID IN MARCH, THEY HAVE STILL HAVE GOT 700 PLUS KIDS IN CONGREGATE CARE, AND AS SHE TOLD THAT REPORTER, ABOUT 250 OF THEM COULD BE LIVING IN FAMILIES. THAT NUMBER HAS NOT MOVED AN INCH IN THE PAST THREE MONTHS. DO YOU THINK THERE IS ANY SERIOUS WORLD IN WHICH THE OPENING UP OF THOSE 26 BEDS AT CATHOLIC HOMES DOESN'T MOVE SOME REAL LIVE KIDS TO GET INTO FOSTER HOMES? OF COURSE IT DOES.

THE GOVERNMENT TALKED ABOUT THEIR EXCEPTIONS POLICY. AND WE HEARD SOME TESTIMONY. NO ONE HAS CLOSED ON IT AND I WILL NOT EITHER, OTHER THAN TO

MAKE THIS OBSERVATION. WE HEARD SOME TESTIMONY ABOUT DOE CHILD NUMBER 1, AND IF ONE THING IS CLEAR, I AM SURE, YOUR HONOR, IS THAT IT WAS A COMPLICATED MESS. THERE'S A COMPLICATED MESS OVER THAT CHILD. BUT THAT'S INSTRUCTIVE, BECAUSE THAT SHOWS THAT WHEN YOU ARE IN A WORLD WHERE YOU CAN'T JUST PROCEED NORMALLY AND YOU HAVE TO GO GET SPECIAL EXCEPTIONS FROM THE TOP OF THE TOP, RIGHT, FROM THE TOP LEVELS OF CITY GOVERNMENT, I BELIEVE WAS THE PHRASE. YOU HAVE TO GO GET EXCEPTIONS AT THE TOP. AND WHEN YOU DON'T HAVE A WRITTEN POLICY AND YOU HAVE NOT TOLD EVERYBODY AT THE BOTTOM, IT'S RIDICULOUS TO ASSUME THAT YOU ARE FINDING OUT ABOUT ALL THE KIDS WHO NEED TO BE PLACED IN ALL THE RIGHT PLACES. THERE IS JUST NO REASON TO ASSUME THAT.

SO THE CURRENT SITUATION THAT IS GOING ON RIGHT NOW WITH THE ILLEGAL FREEZE OF INTAKES HURTS REAL PEOPLE, REAL KIDS, REAL FOSTER PARENTS, REAL AGENCIES. AND THAT'S HARM THAT SHOULD BE STOPPED. AND THE IDEA THAT OUT OF OUR DESIRE TO MAKE SURE THAT EVERYONE GETS TO USE THE AGENCY THEY WANT, WE ARE GOING TO GO TO PEOPLE WHO HAVE DELIBERATELY CHOSEN CATHOLIC, WHO LOVE CATHOLIC, WHO HAVE BEEN WITH CATHOLIC DECADES, AND WE ARE GOING TO SAY, SORRY, YOU CAN'T HAVE CATHOLIC ANY MORE. AND WE ARE GOING TO TAKE THAT AWAY FROM REAL ACTUAL PEOPLE IN ORDER TO VINDICATE THE HYPOTHETICAL

SITUATION THAT HAS NOT ACTUALLY ARISEN YET THAT SOMEBODY MIGHT SHOW UP TO CATHOLIC AND ASK FOR THE CATHOLIC CHURCH TO COME IN AND EVALUATE THEIR FAMILY LIFE IN THIS CIRCUMSTANCE SIMPLY DOES NOT MAKE ANY SENSE. AND I WOULD END BY POINTING THE COURT TO TWO CASES IN OUR BRIEF, MARKS V. JACKSON AND REILLY V. CITY OF HARRISBURG. WHAT THEY BOTH SAY IS THAT THE IRREPARABLE HARM AND BALANCE OF HARM SHOWINGS, THAT'S A SLIDING SCALES, I AM SURE YOUR HONOR IS AWARE FROM THE PRELIMINARY INJUNCTION FACTOR ANALYSIS, BUT THAT A STRONG SHOWING ON IRREPARABLE HARM AND BALANCE OF HARMS CAN EVEN LESSEN WHAT A PARTY NEEDS TO DO ON SUCCESS ON THE MERITS. FOR THE REASONS WE HAVE SAID, WE THINK ACTUALLY SUCCESS ON THE MERITS IS QUITE CLEAR. WE THINK WHAT THE GOVERNMENT IS DOING VIOLATES STATE AND FEDERAL LAW, FEDERAL LAW, BOTH FIRST AMENDMENT AND RELATED TO THEIR FUNDING. SO WE THINK THE MERITS ARE ACTUALLY QUITE STRAIGHTFORWARD, BUT IF YOU HAVE ANY DOUBT, THE HARM ALONE SHOULD BE ABLE TO CARRY THE DAY FOR THE INJUNCTION. SO WITH THAT, WE WOULD ASK YOUR HONOR TO ENTER THE INJUNCTION. THANK YOU.

THE COURT: OKAY, THANK YOU. THE COURT HOLDS THE MATTER UNDER ADVISEMENT. HOWEVER, I WOULD REQUEST OF THE PARTIES THAT THEY FILE FINDINGS OF FACTS AND CONCLUSIONS OF LAW BY THE 28TH OF JUNE. AND THE

COURT WILL ISSUE ITS RULING SHORTLY THEREAFTER.

IS THERE ANYTHING FURTHER?

MR. RIENZI: NO, YOUR HONOR.

MS. CORTES: NO, YOUR HONOR.

THE COURT: OKAY. HAVE A GOOD EVENING.

(ALL RISE.)

I CERTIFY THAT THE FOREGOING IS A CORRECT TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE ABOVE-ENTITLED MATTER.

DATE OFFICIAL COURT REPORTER

LYNN MCCLOSKEY, RPR.

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EXHIBIT 26

App. No. ___-_____

In the Supreme Court of the United States

SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH, CATHOLIC SOCIAL SERVICES,

Applicants,

v.

CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS,

Respondents.

SUPPLEMENTAL DECLARATION OF JAMES AMATO

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Dated: July 31, 2018

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SUPPLEMENTAL DECLARATION OF JAMES AMATO

1. My name is James Amato. I am over the age of 21 years old and capable of making this declaration pursuant to 28 U.S.C. § 1746. I have not been convicted of a felony or been convicted of a crime of dishonesty. I have personal knowledge of all the contents of this declaration.

2. Catholic Social Services today has at least 35 spots available for foster child placement. Catholic typically has only 4 to 5 vacancies at any given time. These additional vacancies are a direct result of the City's intake freeze.

3. Because of the intake freeze, Catholic has already transferred two employees to other departments within the broader organization. Catholic anticipated laying off additional employees in August, but has been able to stave off layoffs for the short term by relying upon staff from other programs and increasing their duties. This is not a long-term solution, and Catholic will have to make additional layoffs as it continues the wind-down process.

4. Catholic is also in danger of losing experienced staff because employees are aware that we are winding down operations and are worried about their job security. Whether through layoffs or voluntary departures of valued, long-term staff, our program will lose the experience and relationships we rely on.

5. Unless the City ends the intake freeze, it is likely that Catholic's foster care program will be forced to close in a matter of months.

6. We cannot make up for the loss of foster care work in Philadelphia by relying on our contracts with neighboring counties. Our contracts with other counties

account for only a small fraction of our foster care work. Foster care regulations prioritize keeping children in their current schools and placing them close to their birth families, where possible. Because of those rules, it is difficult for a foster agency based in one county to provide services in other counties.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 31, 2018.

James Amato