

# **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 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]. [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]

[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.

A handwritten signature in cursive script, reading "Sharonell Fulton", is written over a horizontal line.

Sharonell Fulton