

No. 18-2574

**United States Court of Appeals
for the Third Circuit**

SHARONELL FULTON, ET AL.,

Plaintiffs-Appellants,

v.

CITY OF PHILADELPHIA, ET AL.,

Defendants-Appellees.

On Appeal from the U.S District Court for the
Eastern District of Pennsylvania,
No. 2:18-cv-02075-PBT (Hon. Petrese B. Tucker, U.S.D.J.)

JOINT APPENDIX VOL. 2, pp. Appx.70-0825

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**United States District Court
Eastern District of Pennsylvania (Philadelphia)
CIVIL DOCKET FOR CASE #: 2:18-cv-02075-PBT**

FULTON et al v. CITY OF PHILADELPHIA et al
Assigned to: HONORABLE PETRESE B. TUCKER
Case in other court: USCA, 18-02574
Cause: 42:1983 Civil Rights Act

Date Filed: 05/17/2018
Jury Demand: None
Nature of Suit: 440 Civil Rights: Other
Jurisdiction: Federal Question

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Date Filed	#	Docket Text
05/17/2018	<u>1</u>	COMPLAINT against CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS (Filing fee \$ 400 receipt number 178509.), filed by TONI LYNN SIMMS-BUSCH, SHARONELL FULTON, CECELIA PAUL, CATHOLIC

		SOCIAL SERVICES. (Attachments: # 1 Case Management Track Form, # 2 Civil Cover Sheet, # 3 Designation Form, # 4 Exhibit, # 5 Exhibit, # 6 Exhibit, # 7 Exhibit, # 8 Exhibit, # 9 Exhibit, # 10 Exhibit, # 11 Exhibit)(jwl,) (Entered: 05/17/2018)
05/17/2018	2	Disclosure Statement Form pursuant to FRCP 7.1 by CATHOLIC SOCIAL SERVICES. (jwl,) (Entered: 05/17/2018)
05/17/2018		Summons Issued as to CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS. Three Forwarded To: Counsel on 5/17/18 (jwl,) (Entered: 05/17/2018)
06/01/2018	3	MOTION for Pro Hac Vice of <i>Nicholas Reaves</i> (Filing fee \$ 40 receipt number 0313-12842006.) filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH.Certificate of Service.(CENTRELLA, NICHOLAS) (Entered: 06/01/2018)
06/01/2018	4	MOTION for Pro Hac Vice of <i>Lori Windham</i> (Filing fee \$ 40 receipt number 0313-12842042.) filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH.Certificate of Service.(CENTRELLA, NICHOLAS) (Entered: 06/01/2018)
06/01/2018	5	MOTION for Pro Hac Vice of <i>Mark L. Rienzi</i> (Filing fee \$ 40 receipt number 0313-12842065.) filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH.Certificate of Service.(CENTRELLA, NICHOLAS) (Entered: 06/01/2018)
06/05/2018	6	Proposed Order <i>Granting 7 Plaintiffs Motion for Leave to File a Memorandum Over 25 Pages</i> filed by CATHOLIC SOCIAL SERVICES.(CENTRELLA, NICHOLAS) Modified on 6/6/2018 (tjd). (Entered: 06/05/2018)
06/05/2018	7	MOTION for Leave to File Excess Pages <i>in Support of their Motion for a Temporary Restraining Order and Preliminary Injunction</i> filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH.PLF's Opposed MTN for Leave and Cert of Service.(CENTRELLA, NICHOLAS) (Entered: 06/05/2018)
06/05/2018	8	NOTICE of Appearance by BENJAMIN H. FIELD on behalf of CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS with Certificate of Service(FIELD, BENJAMIN) (Entered: 06/05/2018)
06/05/2018	9	NOTICE of Appearance by ELEANOR N. EWING on behalf of CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS with Certificate of Service(EWING, ELEANOR) (Entered: 06/05/2018)
06/06/2018	11	ORDER THAT PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE A MEMORANDUM OVER 25 PAGES IN SUPPORT OF THEIR MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION IS GRANTED. DEFENDANTS SHALL FILE A RESPONSE TO PLAINTIFFS' MOTION FOR A TEMPORARARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION BY NO LATER THAN 6/12/18. THE PARTIES SHALL APPEAR FOR A EVIDENTIARY HEARING ON PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION ON 6/18/18 AT 2:00 PM IN COURTROOM 16B. SIGNED BY HONORABLE PETRESE B. TUCKER ON 6/6/18. 6/6/18 ENTERED AND COPIES MAILED AND E-MAILED.(mbh,). (Entered: 06/06/2018)

06/06/2018	12	ORDER THAT THE APPLICATIONS FOR ADMISSION PRO HAC VICE OF NICHOLAS R. REAVES, ESQ, LORI H. WINDHAM, ESQ AND MARK L. RIENZI, ESQ ARE GRANTED AND NICHOLAS R. REAVES, ESQ, LORI H. WINDHAM, ESQ AND MARK L. RIENZI, ESQ ARE ADMITTED PRO HAC VICE TO THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA FOR THE PENDENCY OF THIS MATTER. SIGNED BY HONORABLE PETRESE B. TUCKER ON 6/6/18. 6/6/18 ENTERED AND COPIES MAILED AND E-MAILED. (mbh,) (Entered: 06/06/2018)
06/07/2018	13	Amended MOTION for Temporary Restraining Order , Amended MOTION for Preliminary Injunction filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH.Memorandum, Declaration, Certificate of Service. (Attachments: # 1 Text of Proposed Order, # 2 Memorandum, # 3 Exhibit 1 part 1, Amato Declaration, # 4 Exhibit 1 part 2, # 5 Exhibit 1 part 3, # 6 Exhibit 1 part 4, # 7 Exhibit 1 part 5, # 8 Exhibit 1 part 6, # 9 Exhibit 1 part 7, # 10 Exhibit 2, # 11 Exhibit 3, # 12 Exhibit 4, # 13 Exhibit 5, # 14 Exhibit 6)(RIENZI, MARK) (Entered: 06/07/2018)
06/08/2018	14	MOTION to Intervene filed by PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES.Certificate of Service.(WIGGLESWORTH, CATHERINE) (Entered: 06/08/2018)
06/11/2018	15	NOTICE of Appearance by MOLLY M. TACK-HOOPER on behalf of PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES with Certificate of Service(TACK-HOOPER, MOLLY) (Entered: 06/11/2018)
06/11/2018	16	NOTICE of Appearance by MARY CATHERINE ROPER on behalf of PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES with Certificate of Service(ROPER, MARY) (Entered: 06/11/2018)
06/12/2018	17	NOTICE of Appearance by DIANA P. CORTES on behalf of CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS with Certificate of Service(CORTES, DIANA) (Entered: 06/12/2018)
06/12/2018	18	MOTION for Pro Hac Vice <i>Admission of Leslie Cooper</i> (Filing fee \$ 40 receipt number 0313-12863444.) filed by PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES.Certificate of Service.(TACK-HOOPER, MOLLY) (Entered: 06/12/2018)
06/12/2018	19	MOTION to Seal filed by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS.Motion for Leave to File Under Seal with Certificate of Service and Proposed Order. (Attachments: # 1 Text of Proposed Order)(FIELD, BENJAMIN) (Entered: 06/12/2018)
06/12/2018	20	RESPONSE in Opposition re 13 Amended MOTION for Temporary Restraining Order Amended MOTION for Preliminary Injunction , 10 MOTION for Temporary Restraining Order <i>and</i> MOTION for Preliminary Injunction filed by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS. (Attachments: # 1 Exhibit Ex.1 - Declaration of K. Ali, # 2 Exhibit Ex. 1-A, # 3 Exhibit Ex. 1-B, # 4 Exhibit Ex. 1-C, # 5 Exhibit Ex. 1-D, # 6 Exhibit Ex. 2 - Declaration of C. Figueroa, # 7 Exhibit Ex. 3 - Declaration of B. Field, # 8 Exhibit Ex. 3-A, # 9 Exhibit Ex. 3-B, # 10 Text of Proposed Order Proposed Order)(FIELD, BENJAMIN) (Entered: 06/12/2018)
06/13/2018	21	Memorandum of law in opposition to plffs' motion for temporary restraining order and

		preliminary injunction, Certificate of Service, filed by DEFTS CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS. (FILED UNDER SEAL) (kw,) (Additional attachment(s) added on 6/14/2018: # 1 sealed document) (tjd,). (Entered: 06/13/2018)
06/13/2018	22	MOTION for Pro Hac Vice of <i>Stephanie H. Barclay</i> (Filing fee \$ 40 receipt number 0313-12866336.) filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH.Certificate of Service.(CENTRELLA, NICHOLAS) (Entered: 06/13/2018)
06/14/2018	23	Letter to Judge Tucker dated June 14, 2018 by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS <i>Regarding Confidential Information</i> (FIELD, BENJAMIN) Modified on 6/18/2018 (tjd). (Entered: 06/14/2018)
06/14/2018	24	Letter to Judge Tucker dated June 14, 2018 by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH (Attachments: # 1 Declaration)(RIENZI, MARK) Modified on 6/18/2018 (tjd). (Entered: 06/14/2018)
06/14/2018	25	ORDER THAT COUNSEL SHALL APPEAR AT THE EVIDENTIARY HEARING SCHEDULED FOR 6/18/2018 AT 2:00 P.M. IN COURTROOM 16B, JAMES A. BYRNE U.S. COURTHOUSE, 601 MARKET STREET, PHILA., PA 19106, ETC. IT IS FURTHER ORDERED THAT PLFFS' APPLICATION FOR ADMISSION PRO HAC VICE OF STEPHANIE H. BARCLAY & DEFTS' APPLICATION FOR ADMISSION PRO HAC VICE OF LESLIE COOPER ESQ. ARE GRANTED, ETC. SIGNED BY HONORABLE PETRESE B. TUCKER ON 6/14/18. 6/15/18 ENTERED AND COPIES MAILED AND E-MAILED.(kw,) (ECF FORM MAILED TO STEPHANIE H. BARCLAY, ESQ.) Modified on 6/15/2018 (kw,). (Entered: 06/15/2018)
06/15/2018	26	NOTICE of Appearance by JOHN A. GUERNSEY on behalf of CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH (Attachments: # 1 Certificate of Service Certificate of Service for John A. Guernsey) (GUERNSEY, JOHN) (Entered: 06/15/2018)
06/15/2018	27	Memorandum of Law in Support re 14 MOTION to Intervene filed by PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES. Certificate of Service. (Attachments: # 1 Proposed Answer, # 2 Declaration of Frank P. Cervone, # 3 Declaration of Stephanie Haynes)(TACK-HOOPER, MOLLY) Modified on 6/25/2018 (tjd). (Entered: 06/15/2018)
06/18/2018	28	MOTION for Leave to File <i>Opposition to Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction</i> filed by PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES.Memorandum, Certificate of Service. (Attachments: # 1 Exhibit A, Proposed Intervenors' Opposition to Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction)(WIGGLESWORTH, CATHERINE) (Entered: 06/18/2018)
06/18/2018	29	NOTICE of Appearance by WILL W. SACHSE on behalf of PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES with Certificate of Service(SACHSE, WILL) (Entered: 06/18/2018)
06/18/2018	30	NOTICE of Appearance by SCHAUNDRA OLIVER on behalf of CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS with Certificate of Service(OLIVER, SCHAUNDRA) (Entered: 06/18/2018)
06/20/2018	31	ORDER THAT THE CITY PARTIES' 19 MOTION FOR LEAVE TO FILE

		DOCUMENTS UNDER SEAL IS GRANTED SIGNED BY HONORABLE PETRESE B. TUCKER ON 6/18/18.6/20/18 ENTERED AND COPIES MAILED & E-MAILED. (fdc) (Entered: 06/20/2018)
06/20/2018	32	ORDER THAT THE FIRST MOTION 10 IS DISMISSED AS MOOT AND THE AMENDED MOTION 13 SHALL BE TREATED AS PLAINTIFFS' ORIGINAL FILING FOR THE PURPOSE OF THIS CASE. IT IS FURTHER ORDERED THAT THE CLERK OF COURT SHALL MAINTAIN THE FIRST MOTION 10 UNDER SEAL TO PROTECT THE PRIVACY INTERESTS AND IDENTITIES OF CERTAIN MINOR CHILDREN IDENTIFIED IN THE FIRST MOTION. SIGNED BY HONORABLE PETRESE B. TUCKER ON 6/20/18.6/20/18 ENTERED AND COPIES MAILED, E-MAILED.(fdc) (Entered: 06/20/2018)
06/20/2018	33	ORDER THAT PROPOSED INTERVENORS' 28 MOTION FOR LEAVE TO FILE THEIR MEMORANDUM OF LAW, OR, IN THE ALTERNATIVE, AMICUS BRIEF, IN OPPOSITION TO PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION IS GRANTED IN THAT THE COURT ACCEPTS 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.28-1), ATTACHED AS EXHIBIT A TO THE MOTION FOR LEAVE, AS AN AMICUS BRIEF THE AMICUS BRIEF SHALL BE DEEMED FILED AS OF THE DATE OF THIS ORDER. SIGNED BY HONORABLE PETRESE B. TUCKER ON 6/20/18 6/20/18 ENTERED AND COPIES MAILED & E MAILED (fdc) (Entered: 06/20/2018)
06/20/2018	34	Memorandum of Law, or, in the Alternative, Amicus Brief, in Opposition to Plaintiffs' 10 Motion for Temporary Restraining Order and Preliminary Injunction filed by PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES. (fdc) (Main Document 34 replaced on 6/21/2018) (afm,). (Entered: 06/20/2018)
06/21/2018	35	NOTICE by PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES of <i>Withdrawal of appearance of Frank Cervone as Counsel</i> (ROPER, MARY) (Entered: 06/21/2018)
06/21/2018	37	Minute Entry for proceedings held before HONORABLE PETRESE B. TUCKER TRO Motion Hearing was held on 6/18/18 (jaa,) Modified on 6/22/2018 (jaa,). COURT REPORTER/ESR. (Entered: 06/22/2018)
06/21/2018	38	Minute Entry for proceedings held before HONORABLE PETRESE B TUCKER TRO Motion Hearing was held on 6/19/18 (jaa,) Modified on 6/22/2018 (jaa,). COURT REPORTER/ESR (Entered: 06/22/2018)
06/22/2018	36	NOTICE by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS <i>Regarding New Evidence at Hearing</i> (FIELD, BENJAMIN) (Entered: 06/22/2018)
06/22/2018	39	Minute Entry, Hearing re TRO Motion Hearing for proceedings held before HONORABLE PETRESE B. TUCKER in Courtroom 16B on 6/21/18. Court Reporter: Lynn McCloskey (kw,) (Entered: 06/25/2018)
06/25/2018	40	Letter to Judge Tucker dated June 25, 2018 by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH re 36 Notice (Other) in response to City's 6/22 letter (RIENZI, MARK) Modified on 6/26/2018 (tjd). (Entered: 06/25/2018)
06/27/2018	41	Letter to Judge Tucker dated June 27, 2018 by CATHOLIC SOCIAL SERVICES,

		SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH <i>re NIFLA v. Becerra Supreme Court decision</i> (Attachments: # 1 Supreme Court decision)(RIENZI, MARK) Modified on 6/29/2018 (tjd). (Entered: 06/27/2018)
06/28/2018	42	Letter to Judge Tucker dated June 28, 2018 by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH <i>re Janus v. American Federation of State, County, and Municipal Employees Council Supreme Court decision</i> (Attachments: # 1 Supreme Court Opinion)(RIENZI, MARK) Modified on 7/2/2018 (tjd). (Entered: 06/28/2018)
06/28/2018	43	NOTICE of Appearance by FRED T. MAGAZINER on behalf of PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES with Certificate of Service(MAGAZINER, FRED) (Entered: 06/28/2018)
06/28/2018	44	NOTICE of Appearance by JANE LOVITCH ISTVAN on behalf of CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS with Certificate of Service(ISTVAN, JANE) (Entered: 06/28/2018)
06/28/2018	45	Proposed Findings of Fact and Conclusions of Law by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS. Certificate of Service (EWING, ELEANOR) (Entered: 06/28/2018)
06/28/2018	46	Proposed Findings of Fact and Conclusions of Law by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH. Certificate of Service (Attachments: # 1 Exhibit Supplemental Declaration of James Amato)(RIENZI, MARK) (Entered: 06/28/2018)
06/29/2018	47	Letter to Judge Tucker dated June 29, 2018 by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS <i>Objecting to Supplemental Declaration</i> (EWING, ELEANOR) Modified on 7/5/2018 (tjd). (Entered: 06/29/2018)
06/29/2018	48	Memorandum of Law in Opposition re 14 MOTION to Intervene filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH. (RIENZI, MARK) Modified on 7/5/2018 (tjd). (Entered: 06/29/2018)
07/10/2018	49	Letter to Judge Tucker dated July 10, 2018 by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH (RIENZI, MARK) Modified on 7/13/2018 (tjd). (Entered: 07/10/2018)
07/11/2018	50	Letter to Judge Tucker dated July 11, 2018 by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS re 49 Notice (Other) (FIELD, BENJAMIN) Modified on 7/17/2018 (tjd). (Entered: 07/11/2018)
07/12/2018	51	WAIVER OF SERVICE Returned Executed by CECELIA PAUL, SHARONELL FULTON, TONI LYNN SIMMS-BUSCH, CATHOLIC SOCIAL SERVICES. Waivers sent to All Defendants on 5/30/2018, answers due 7/30/2018. (WINDHAM, LORI) Modified on 7/16/2018 (tjd). (Entered: 07/12/2018)
07/13/2018	52	MEMORANDUM FILED. SIGNED BY HONORABLE PETRESE B. TUCKER ON 07/13/2018. 07/13/2018 ENTERED AND COPIES MAILED AND E-MAILED.(dt) (Entered: 07/13/2018)
07/13/2018	53	ORDER OF 7/13/18 THAT PLAINTIFF'S INJUNCTION MOTION IS DENIED. 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. SIGNED BY JUDGE PETRESE B. TUCKER. 7/13/18 ENTERED AND COPIES MAILED AND E-MAILED. (DT) (Entered: 07/13/2018)
07/13/2018	54	NOTICE OF APPEAL as to 53 Order (Memorandum and/or Opinion), by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH. Filing fee \$ 505, receipt number 0313-12924159. Copies to Judge, Clerk USCA, Appeals Clerk.** (FILED IN ERROR BY ATTY, SEE DOCUMENT 55 FOR CORRECT NOTICE OF APPEAL)** (WINDHAM, LORI) Modified on 7/17/2018 (tjd). (Entered: 07/13/2018)
07/13/2018	55	NOTICE OF APPEAL as to 53 Order (Memorandum and/or Opinion), by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH. Filing fee \$ 505, receipt number 0313-12924159. Copies to Judge, Clerk USCA, and Appeals Clerk. (RIENZI, MARK) Modified on 7/17/2018 (tjd). (Entered: 07/13/2018)
07/14/2018	56	Emergency MOTION for Injunction <i>pending appeal</i> filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH. Brief. (Attachments: # 1 Brief in support of motion, # 2 Text of Proposed Order)(RIENZI, MARK) Modified on 7/18/2018 (tjd). (Entered: 07/14/2018)
07/16/2018	57	NOTICE of Docketing Record on Appeal from USCA re 55 Notice of Appeal, filed by TONI LYNN SIMMS-BUSCH, CECELIA PAUL, CATHOLIC SOCIAL SERVICES, SHARONELL FULTON. USCA Case Number 18-2574 (dmc,) Modified on 7/17/2018 (dmc,). (Entered: 07/17/2018)
07/18/2018	58	ORDER THAT DEFENDANTS SHALL FILE A RESPONSE TO PLAINTIFFS EMERGENCY MOTION FOR INJUNCTION PENDING APPEAL BY 7/23/18; ETC.. SIGNED BY HONORABLE PETRESE B. TUCKER ON 7/18/18. 7/18/18 ENTERED AND E-MAILED.(jl,) (Entered: 07/18/2018)
07/18/2018	59	ORDER THAT THE MOTION OF THE SUPPORT CENTER FOR CHILD ADVOCATES AND PHILADELPHIA FAMILY PRIDE TO INTERVENE AS DEFENDANTS IS STAYED; ETC.. SIGNED BY HONORABLE PETRESE B. TUCKER ON 7/18/18. 7/18/18 ENTERED AND E-MAILED.(jl,) (Entered: 07/18/2018)
07/20/2018	60	MOTION for Reconsideration re 59 Order <i>or, Alternatively, for Indicative Ruling pursuant to FRCP 62.1</i> filed by PHILADELPHIA FAMILY PRIDE, SUPPORT CENTER FOR CHILD ADVOCATES.certificate of service. (Attachments: # 1 Text of Proposed Order, # 2 Text of Proposed Order)(ROPER, MARY) (Entered: 07/20/2018)
07/23/2018	61	Memorandum of Law in Opposition re 56 Emergency MOTION to Enjoin <i>Defendants, pending appeal with Proposed Order and Certification of Service</i> filed by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS. (Attachments: # 1 Text of Proposed Order)(FIELD, BENJAMIN) Modified on 7/26/2018 (tjd). (Entered: 07/23/2018)
07/24/2018	63	ORDER THAT PLFFS' EMERGENCY MOTION FOR INJUNCTION PENDING APPEAL (ECF NO. 56), IS DENIED. SIGNED BY HONORABLE PETRESE B. TUCKER ON 7/24/18.7/25/18 ENTERED AND COPIES E-MAILED.(kw,) (Entered: 07/25/2018)
07/25/2018	62	Letter to Judge Tucker dated July 25, 2018 filed by CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA,

		PHILADELPHIA COMMISSION ON HUMAN RELATIONS.(FIELD, BENJAMIN) Modified on 7/25/2018 (tjd). (Entered: 07/25/2018)
07/26/2018	64	ORDER THAT DEFTS' DEADLINE FOR FILING AN ANSWER OR RESPONSE TO PLFFS' COMPLAINT (DOC. 1) IS CONTINUED UNTIL FURTHER ORDER OF THE COURT. SIGNED BY HONORABLE PETRESE B. TUCKER ON 7/26/18. 7/27/18 ENTERED AND COPIES E-MAILED.(kw,) (Entered: 07/27/2018)
07/26/2018	65	ORDER THAT TO THE EXENT THAT PARTIES WISH TO RESPOND TO THE MOTION FOR RECONSIDERATION, (DOC. 60), PARTIES SHALL RESPOND ON OR BEFORE 7/30/2018. IT IS FURTHER ORDERED THAT NO REPLY BRIEFS IN CONNECTION WITH THIS MOTION FOR RECONSIDERATION SHALL BE FILED WITHOUT LEAVE OF COURT. SIGNED BY HONORABLE PETRESE B. TUCKER ON 7/26/18. 7/27/18 ENTERED AND COPIES E-MAILED.(kw,) (Entered: 07/27/2018)
07/30/2018	66	RESPONSE in Opposition re 60 MOTION for Reconsideration re 59 Order <i>or, Alternatively, for Indicative Ruling pursuant to FRCP 62.1</i> filed by CATHOLIC SOCIAL SERVICES, SHARONELL FULTON, CECELIA PAUL, TONI LYNN SIMMS-BUSCH. (WINDHAM, LORI) (Entered: 07/30/2018)
07/31/2018	67	NOTICE of Appearance by MICHAEL WU-KUNG PFAUTZ on behalf of CITY OF PHILADELPHIA, DEPARTMENT OF HUMAN SERVICES FOR THE CITY OF PHILADELPHIA, PHILADELPHIA COMMISSION ON HUMAN RELATIONS with Certificate of Service(PFAUTZ, MICHAEL) (Entered: 07/31/2018)
08/01/2018	68	ORDER THAT PROPOSED INTERVENORS' MOTION FOR RECONSIDERATION OF THE COURT'S ORDER STAYING THE MOTION FOR LEAVE TO INTERVENE OR, IN THE ALTERNATIVE, THAT THE COURT AMEND ITS ORDER TO INCLUDE AN INDICATIVE RULING PURSUANT TO F.R.C.P. 62.1 IS GRANTED, ETC. SIGNED BY HONORABLE PETRESE B. TUCKER ON 8/1/18.8/2/18 ENTERED AND COPIES E-MAILED.(kw,) (Entered: 08/02/2018)
08/13/2018	69	ORDER THAT PROPOSED INTERVENORS' MOTION TO INTERVENE IS GRANTED & THE CLERK OF COURT SHALL LIST SUPPORT CENTER FOR CHILD ADVOCATES AND PHILADELPHIA FAMILY PRIDE AS DEFTS IN THIS MATTER. SIGNED BY HONORABLE PETRESE B. TUCKER ON 8/13/18.8/14/18 ENTERED AND COPIES E-MAILED.(kw,) (Entered: 08/14/2018)

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1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF PENNSYLVANIA

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4 SHARONELL FULTON, ET AL : CIVIL DOCKET FOR CASE
: NO. 18-20755 -VS- :
:6 CITY OF PHILADELPHIA, ET AL :
:

7 - - -

8 PHILADELPHIA, PA.

9 JUNE 18, 2018

10 BEFORE HONORABLE JUDGE PETRESE B. TUCKER

11 TEMPORARY RESTRAINING ORDER

12 DAY 1

13 APPEARANCES:

14 FOR THE PLAINTIFF: BECKET FUND FOR RELIGIOUS LIBERTY
BY: LORI H. WINDHAM, ESQ.
15 MARK L. RIENZI, ESQ.
STEPHANIE H. BARCLAY, ESQ.
16 1200 NEW HAMPSHIRE AVE, N.W.
SUITE 700
17 WASHINGTON, DC 2003618 FOR THE DEFENDANTS: CITY OF PHILADELPHIA LAW DEPARTMENT
BY: ELEANOR N. EWING, ESQ.
19 BENJAMIN H. FIELD, ESQ.
SCHAUNDRA OLIVER, ESQ.
20 1515 ARCH STREET, 16TH FLOOR
PHILADELPHIA, PA 1910221
22 LYNN MCCLOSKEY, RPR
23 OFFICIAL COURT REPORTER
1234 US COURTHOUSE
24 601 MARKET STREET
PHILADELPHIA, PA 19106
25 (856) 649-4774

1 **FOR THE DEFENDANTS: MARSHALL DENNEHEY WARNER COLEMAN &**
2 **GOGGIN**
3 **BY: DIANA P. CORTES, ESQ.**
4 **2000 MARKET STREET, SUITE 2300**
5 **PHILADELPHIA, PA 19103**

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1 THE COURT: GOOD AFTERNOON.

2 ALL COUNSEL: GOOD AFTERNOON, YOUR HONOR.

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

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

14 THE COURT: WOULD DISCUSSIONS BE
15 FRUITFUL?

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

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

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

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

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

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

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

19 MS. WINDHAM: CERTAINLY.

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

22 MS. WINDHAM: THANK YOU, YOUR HONOR.

23 THE COURT: YOU MAY PROCEED WITH OPENING
24 STATEMENT.

25 MS. WINDHAM: THANK YOU.

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

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

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

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

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

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

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

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

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

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

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

21 THE DECLARATION OF BISHOP MCINTYRE
22 DETAILS THE IMPORTANCE OF THIS FUNDAMENTAL RELIGIOUS
23 EXERCISE TO CATHOLIC SOCIAL SERVICES AND TO ITS CATHOLIC
24 FAITH. THIS COURT ALSO RECOGNIZED IN THE CASE OF CHOSEN
25 300 MINISTRIES IN THE CITY OF PHILADELPHIA THAT ACTS OF

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

17 THE CITY HAS FAILED TO PROVE THAT THAT IS
18 NOT A LESS-RESTRICTIVE ALTERNATIVE TO MEET THEIR GOALS.
19 THE SAME STRICT SCRUTINY STANDARD APPLIES TO THE
20 PLAINTIFFS' CLAIMS UNDER THE FREE EXERCISE CLAUSE. AND
21 I WANT TO MENTION FOR A MOMENT THE FREE EXERCISE CLAUSE.
22 THE CITY HAS SORT OF MERGED TOGETHER TWO DIFFERENT
23 ANALYSES AND THEY ARE TWO SEPARATE ANALYSES. FIRST, THE
24 3RD CIRCUIT HAS MADE CLEAR IN THE BLACK HAWK CASE THAT
25 WHERE YOU HAVE A GOVERNMENT SYSTEM THAT CREATES A REGIME

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

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

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

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

10 55 PENNSYLVANIA CODE SECTION 3700.66
11 ACTUALLY HAS A WHOLE LIST OF REQUIREMENTS ABOUT THE
12 CONDITION OF THE FAMILY'S RESIDENCE THAT YOU CONSIDER AS
13 PART OF THE HOME STUDY. AND SO GIVEN THAT THE LANGUAGE
14 IN THIS CONTRACT PROVISION SEEMS TO BE IN CONFLICT WITH
15 THE STATE REGULATIONS, I BELIEVE THAT THE BEST READING
16 OF THIS CONTRACT PROVISION IS THAT IT'S NOT TALKING
17 ABOUT HOME STUDIES AT ALL. AND THIS IS WHAT THE CITY IS
18 USING TO ARGUE THAT CATHOLIC SOCIAL SERVICES IS
19 COMPELLED TO PERFORM THESE HOME STUDIES PURSUANT TO THE
20 CONTRACT.

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

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

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

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

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

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

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

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

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

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

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

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

1 WHAT IT IS CONSTITUTIONALLY PROHIBITED FROM DOING
2 DIRECTLY.

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

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

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

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

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

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

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

11 THE COURT: OKAY, THANK YOU.

12 MS. EWING: GOOD AFTERNOON, YOUR HONOR.

13 THE COURT: GOOD AFTERNOON.

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

1 ARE NO CHILDREN WHO ARE NOT BEING PLACED APPROPRIATELY.

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

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

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

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

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

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

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

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

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

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

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

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

1 APPLICANT ON THE BASIS OF SEXUAL ORIENTATION.

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

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

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

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

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

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

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

1 HAVING ITS INTAKE RESTORED.

2 THE EXEMPTION CASES ALSO DO NOT APPLY.

3 THERE IS A LOT OF -- IF YOU LOOK AT PARTICULARLY AT THE
4 3RD CIRCUIT'S DECISION IN THE FOP VERSUS CITY OF NEWARK
5 CASE, IT GIVES A GOOD BASIS OF ANALYSIS AS TO WHAT KIND
6 OF EXEMPTIONS ARE RELEVANT ONES, AND THEY ARE ONES THAT
7 YOU HAVE TO IDENTIFY THE CORRECT POLICY AND THEN YOU
8 HAVE TO DECIDE WHETHER AN EXCEPTION IS OF THE SAME TYPE
9 DIRECTED TO FURTHERING THAT POLICY OR WHETHER IT'S
10 SOMETHING, IT'S APPLES AND ORANGES. AND WE MAINTAIN
11 THAT IN THIS CASE, FIRST OF ALL THE POLICY IS THE --
12 WHETHER OR NOT ANY EXEMPTIONS ARE BEING GIVEN TO ALLOW
13 DISCRIMINATION, AND THE ANSWER IS NO, EMPHATICALLY. AND
14 EVEN THE EXEMPTIONS THAT CATHOLIC SOCIAL SERVICES TALKS
15 ABOUT ALLOWING YOU TO REFER FOR GEOGRAPHIC CONVENIENCE
16 AND SUCH ARE FOR THE BEST INTEREST OF THE CHILDREN
17 WHEREAS GIVING AN EXEMPTION TO DISCRIMINATE IS NOT.

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

25 AS FAR AS SPEECH, THERE IS NO EVIDENCE TO

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

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

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

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

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

24 THE COURT: THANK YOU.

25 PLAINTIFF, CALL YOUR FIRST WITNESS.

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

4 (WITNESS SWORN.)

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

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

9 THE COURT: YES, PLEASE.

10 DIRECT EXAMINATION

11 BY MS. BARCLAY:

12 Q. GOOD AFTERNOON.

13 A. GOOD AFTERNOON.

14 Q. PLEASE STATE YOUR NAME FOR THE RECORD.

15 A. TONI SIMMS-BUSCH.

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

18 A. I AM A FOSTER MOTHER.

19 Q. IN WHAT CITY DO YOU LIVE?

20 A. PHILADELPHIA, PENNSYLVANIA.

21 Q. HOW LONG HAVE YOU LIVED THERE?

22 A. PHILADELPHIA, PENNSYLVANIA? MY ENTIRE LIFE,
23 38 YEARS.

24 Q. CAN YOU DESCRIBE YOUR EDUCATIONAL BACKGROUND?

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

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

4 Q. HOW DID YOU DO ACADEMICALLY IN THESE PROGRAMS?

5 A. I DID VERY WELL.

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

8 A. YES. WHEN I GRADUATED IN 2002, I WORKED AS A
9 YOUTH COUNSELOR WITH A PARTIAL CARE PROGRAM FOR CHILDREN
10 3 TO 5 AND 6 TO 9. I THEN WORKED IN A RESIDENTIAL
11 TREATMENT FACILITY FOR ADOLESCENT MALE AND FEMALES IN
12 NEW JERSEY. I THEN WORKED AT PSI FAMILY SERVICES AS A
13 FOSTER CARE AGENCY WORKER. AFTER THAT I WAS A CHILD
14 ADVOCATE SOCIAL WORKER FOR NEARLY FOUR YEARS WITH THE
15 DEFENDER ASSOCIATION OF PHILADELPHIA.

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

18 A. YES.

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

21 A. YES.

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

24 A. A LITTLE OVER TWO YEARS.

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

1 LONG DID YOU WORK IN THAT POSITION?

2 A. A LITTLE OVER TWO YEARS.

3 Q. AND WHEN YOU WERE A CHILD ADVOCATE SOCIAL
4 WORKER, HOW MANY YEARS WERE YOU IN THAT POSITION?

5 A. APPROXIMATELY FOUR YEARS.

6 Q. I WOULD LIKE TO TALK TO YOU A LITTLE BIT ABOUT
7 YOUR OBSERVATIONS AS A FOSTER WORKER IN PHILADELPHIA.
8 DURING YOUR WORK, DID YOU EVER OBSERVE IN YOUR
9 EXPERIENCE THERE TO BE A SHORTAGE OF FOSTER HOMES FOR
10 CHILDREN?

11 A. YES.

12 Q. WHAT SORT OF THINGS DID YOU OBSERVE THAT LED YOU
13 TO THINK THAT?

14 A. AS A FOSTER CARE WORKER, AS A CHILD ADVOCATE
15 SOCIAL WORKER, MY PROFESSIONAL EXPERIENCE WAS THAT
16 CHILDREN WERE CONSTANTLY BEING RELOCATED DUE TO
17 PLACEMENT ISSUES. SEVERAL CHILDREN HAD TO BE PLACED --
18 SEVERAL TEENAGE CHILDREN HAD TO BE PLACED IN SHELTERS
19 DUE TO A LACK OF AVAILABLE FOSTER HOMES. CHILDREN HAD
20 TO BE PLACED IN RESPITE FOR TEMPORARY HOLD UNTIL
21 PERMANENT FOSTER HOMES COULD BE LOCATED, AND CHILDREN
22 SOMETIMES -- I HAD A FEW CASES WHERE CHILDREN WOULD HAVE
23 TO STAY AT THE DHS BUILDING UNTIL A PLACEMENT WOULD BE
24 FOUND.

25 Q. WHAT SORT OF IMPACT DID YOU EXPERIENCE THAT TO

1 HAVE ON CHILDREN?

2 A. IT WAS DEVASTATING. CHILDREN, YOU KNOW, THEY
3 COME FROM A TRAUMATIC EXPERIENCE, LOSING THEIR
4 BIOLOGICAL FAMILY, BEING PLACED OUT BY THEIR BIOLOGICAL
5 FAMILY INTO AN UNKNOWN CIRCUMSTANCE, INTO AN UNKNOWN
6 PLACEMENT, AND THEN BEING RELOCATED AGAIN FOR WHATEVER
7 REASON. SO IT INTERRUPTED THEIR STABILITY, THEIR
8 ABILITY TO BOND, THEIR ABILITY TO FORM ATTACHMENTS AND
9 THEIR EDUCATION.

10 Q. DID YOU EXPERIENCE THERE TO BE ANY SORT OF
11 CORRELATION BETWEEN NOT IN A FOSTER HOME AND THE AMOUNT
12 OF TIMES CHILDREN WOULD BE TRANSFERRED?

13 A. YES.

14 Q. WHAT WAS THE CORRELATION?

15 A. YES. SO IF THERE WERE NOT A LOT OF FOSTER HOMES
16 OR AVAILABLE FOSTER HOMES, CHILDREN WOULD BE MOVED
17 MULTIPLE TIMES AGAIN. THEY MAY BE MOVED INTO A SHELTER,
18 THEY MAY BE MOVED INTO A RESPITE, THEY MAY BE MOVED INTO
19 A PERMANENT HOME IF IT WERE AVAILABLE.

20 Q. WHAT HAPPENS TO A CHILD IN YOUR EXPERIENCE WHEN
21 THEY ARE BEING TRANSFERRED?

22 A. AGAIN, CHILDREN LOSE THEIR ATTACHMENT, THEY LOSE
23 THEIR SENSE OF SELF, THEIR EDUCATION MAY BE INTERRUPTED.

24 Q. IS THERE ANY TRAUMA INVOLVED?

25 A. ABSOLUTELY. EVERY TIME A CHILD IS MOVED, THEIR

1 TRAUMA IS IMPACTED AND COMPACTED.

2 Q. CAN YOU DESCRIBE A LITTLE MORE FROM YOUR
3 EXPERIENCE WHAT IT'S LIKE FOR A CHILD TO SPEND A NIGHT
4 OR MULTIPLE NIGHTS AT THE DHS OFFICE?

5 A. IT'S DEVASTATING. I HAVE BEEN THERE JUST A FEW
6 HOURS AS A WORKER AND IT'S NOT A HAPPY PLACE, IT'S NOT
7 DISNEY WORLD. SO FOR A CHILD TO HAVE TO SPEND, YOU
8 KNOW, MORE THAN A COUPLE OF HOURS THERE, POSSIBLY HAVING
9 TO SPEND THE NIGHT THERE, I AM SURE IT'S A VERY --

10 MS. CORTES: YOUR HONOR, I AM GOING TO
11 OBJECTION TO SPECULATION AT THIS POINT.

12 THE COURT: SUSTAINED.

13 MS. CORTES: AND I WOULD LIKE TO STRIKE
14 THE RECORD FOR THE ENTIRE LINE OF QUESTIONING.

15 THE COURT: BUT I WON'T STRIKE IT. BUT
16 IF YOU COULD PROCEED TO ANOTHER SUBJECT.

17 MS. BARCLAY: CERTAINLY, YOUR HONOR.

18 BY MS. BARCLAY:

19 Q. HOW WOULD YOU DESCRIBE THE DIFFERENCE, AGAIN
20 WHAT YOU EXPERIENCED BEING A STAFF MEMBER IN SOME OF
21 THESE DIFFERENT FACILITIES, BETWEEN THE CARE YOU
22 PROVIDED TO A CHILD IN A GROUP HOME AS OPPOSED TO THE
23 TYPE OF CARE A CHILD RECEIVED IN A PERMANENT FOSTER
24 HOME?

25 A. IN A PERMANENT FOSTER HOME, A CHILD RECEIVES

1 CONSISTENT LOVE AND SUPPORT, EDUCATIONAL SUPPORT,
2 CONSISTENT SUPERVISION. THE OPPOSITE TO THAT IN A GROUP
3 HOME OR A FOSTER HOME, IN ANY RESIDENTIAL TREATMENT
4 FACILITY BUT --

5 MS. CORTES: YOUR HONOR, SAME OBJECTION.

6 MS. BARCLAY: YOUR HONOR, THIS IS --

7 THE COURT: OVERRULED.

8 THE WITNESS: WHETHER IT BE A SHELTER,
9 THE CHILD DOES NOT RECEIVE THAT SAME LOVE AND CARE, THAT
10 SAME NURTURING, THAT SAME SUPPORT. IT IS BASICALLY JUST
11 ABOUT SUPERVISION, MAKING SURE THAT THE CHILD ADHERES TO
12 RULES. THERE IS NO ONE-TO-ONE OR VERY LITTLE ONE-TO-ONE
13 INTERACTION THAT THE CHILD WILL RECEIVE FROM A STAFF
14 MEMBER.

15 BY MS. BARCLAY:

16 Q. HOW WOULD YOU DESCRIBE YOUR PRIMARY ROLE IN A
17 GROUP HOME?

18 A. TO SUPERVISE AND SUPPORT, TO MAKE SURE THAT
19 RULES ARE FOLLOWED, TO MAKE SURE THAT STRUCTURE IS
20 IMPLEMENTED.

21 Q. DID YOU EVER OBSERVE IN YOUR EXPERIENCE A
22 CORRELATION BETWEEN THERE NOT BEING ENOUGH FOSTER HOMES
23 AND CHILDREN BEING LEFT IN BIOLOGICAL HOMES?

24 A. YES.

25 Q. CAN YOU TALK ABOUT THAT A LITTLE?

1 A. YES, WHEN I WAS A FOSTER CARE SOCIAL WORKER, THE
2 AGENCIES THAT I HAD WORKED WITH AT THE TIME WERE
3 PREPARING TO CLOSE AND WE HAD CHILDREN WHO -- BECAUSE OF
4 CONTRACTUAL ISSUES WITH THE CITY, THE CHILDREN WERE
5 BEING PLACED INTO SHELTER CARE, SOME OF THEM WERE PLACED
6 INTO RESPITE, TWO WERE PLACED BACK INTO BIOLOGICAL
7 HOMES, WHICH AT THE TIME AS A FOSTER CARE WORKER WAS NOT
8 APPROPRIATE FOR THEM.

9 Q. AND SO YOU HAVE DISCUSSED GROUP HOMES, SHELTERS,
10 OTHER BIOLOGICAL HOMES, THE DHS OFFICE. IN YOUR
11 EXPERIENCE WORKING WITH CHILDREN, HOW DID THOSE OPTIONS
12 COMPARE TO THE CARE GIVEN A CHILD IN A PERMANENT FOSTER
13 HOME?

14 A. NOTHING COMPARES TO THE STABILITY OF A PERMANENT
15 FOSTER HOME. NOTHING COMPARES TO THAT DAILY LOVE AND
16 CARE, THOSE HUGS AND KISSES, THE EDUCATIONAL SUPPORT,
17 NOTHING IN THE WORLD COMPARES TO THAT.

18 Q. IF YOU HAD THE CHOICE BETWEEN A TEMPORARY FOSTER
19 PLACEMENT FOR A CHILD OR A PERMANENT FOSTER PLACEMENT,
20 WHICH IN YOUR EXPERIENCE WOULD HAVE GENERALLY BEEN IN
21 THE BEST INTEREST OF THE CHILD?

22 A. 100 PERCENT A MORE PERMANENT FOSTER HOME.

23 Q. DID YOU EVER EXPERIENCE A TIME WHEN THERE WAS A
24 FREEZE IN REFERRALS WHEN YOU WERE A FOSTER CARE WORKER?

25 A. YES. AGAIN, THERE WERE CONTRACTUAL ISSUES WITH

1 THE AGENCY THAT I WAS WORKING WITH AND THERE WAS A
2 FREEZE. SO WE WERE NOT GETTING ANY NEW REFERRALS,
3 CHILDREN WERE BEING AGAIN NOT PLACED IN THE APPROPRIATE
4 PLACEMENT BECAUSE OUR FOSTER CARE REFERRALS WERE BEING
5 FROZEN. AND SO AGAIN WE HAD TO PLACE KIDS AS BEST AS WE
6 COULD.

7 Q. DOES THE AGENCY THAT YOU WERE WORKING AT STILL
8 EXIST?

9 A. NO.

10 Q. WERE YOU THERE WHEN THAT AGENCY CLOSED?

11 A. YES, I WAS.

12 Q. CAN YOU DESCRIBE WHAT YOU OBSERVED TO BE IMPACTS
13 ON SOME OF THE FAMILIES AND SOME OF THE CHILDREN YOU
14 WORKED WHEN THAT AGENCY CLOSED?

15 A. I WITNESSED CHILDREN BEING MOVED FROM KINSHIP
16 HOMES INTO RESPITE HOMES AND GROUP HOMES AND SHELTERS.
17 I WITNESSED FOSTER CHILDREN BEING PLACED IN RESPITE
18 HOMES BECAUSE THE AGENCY WAS WORKING -- SOME OF THOSE
19 FOSTER PARENTS AND SOME OF THOSE KINSHIP PARENTS CHOSE
20 NOT TO GO TO ANOTHER AGENCY, FOR WHATEVER REASON. AND
21 SO CHILDREN WERE CONSTANTLY BEING PLACED INTO UNFAMILIAR
22 SITUATIONS.

23 Q. SO WERE ANY OF THESE FAMILIES THAT YOU SERVED
24 BROKEN APART?

25 A. ABSOLUTELY.

1 Q. AND WHAT DID YOU OBSERVE TO BE THE IMPACT ON THE
2 CHILDREN?

3 A. IT WAS DEVASTATING. I HAD A CASE ABOUT A LITTLE
4 GIRL, SHE WAS APPROXIMATELY SEVEN YEARS OLD. SHE WAS IN
5 A KINSHIP HOME. SHE HAD BEEN THERE ALMOST SINCE BIRTH,
6 AND BECAUSE OF THE DIFFICULTIES WITH -- YOU KNOW, WITH
7 THE CONTRACT, THE CITY SAID THAT WE HAD TO LOCATE A MORE
8 PERMANENT HOME FOR HER, BECAUSE THE KINSHIP AUNT WOULD
9 NOT ADOPT THE CHILD. THERE WAS A VERY STRONG BOND
10 BETWEEN THE BIOLOGICAL MOTHER AND THE CHILD AND THE
11 FAMILY AND THEY DIDN'T WANT TO TAKE THAT BOND AWAY. WE
12 HAD TO REMOVE THAT CHILD TO ANOTHER HOME. AND I
13 WITNESSED HER DEVASTATION, I WITNESSED HER TRAUMA.

14 Q. DID SOME OF THESE FAMILIES FEEL LIKE THEY WERE
15 UNABLE TO TRANSFER TO A NEW AGENCY?

16 A. YES.

17 Q. HOW DID THIS HAPPEN?

18 A. THEY DIDN'T FEEL LIKE THEY WERE GOING TO GAIN
19 THE SAME SUPPORT AS THEY HAD BEEN RECEIVING.

20 MS. CORTES: OBJECTION, YOUR HONOR,
21 SPECULATION AGAIN.

22 THE COURT: SUSTAINED.

23 MS. CORTES: I ASK THAT YOU STRIKE HER
24 ANSWER.

25 THE COURT: THAT ANSWER WILL BE STRICKEN.

1 BY MS. BARCLAY:

2 Q. AS A FOSTER CARE WORKER, DID YOU EVER REFER
3 PROSPECTIVE FOSTER FAMILIES TO OTHER AGENCIES?

4 A. YES. THERE WERE INSTANCES WHERE I NEEDED TO
5 REFER THEM OUT TO OTHER AGENCIES FOR VARIOUS REASONS.
6 PERHAPS THERE WAS A LANGUAGE BARRIER, PERHAPS THERE WAS
7 A DIFFICULT MEDICAL CASE OR BEHAVIORAL HEALTH CASE THAT
8 MY AGENCY COULD NOT SUPPORT.

9 Q. I WANT TO TAKE EACH OF THOSE WITH YOU IN TURN.
10 IN THE CONTEXT OF A LANGUAGE ISSUE, WALK ME THROUGH WHAT
11 A REFERRAL WOULD LOOK LIKE AND WHY THAT WOULD ARISE?

12 A. RIGHT. SO IF I HAD A CLIENT OR A FAMILY WHO WAS
13 OF ANOTHER LANGUAGE AND FOR SOME REASON I COULD NOT
14 ACCOMMODATE THEM OR MY AGENCY COULD NOT ACCOMMODATE
15 THEM, I WOULD CONTACT A SPECIALIZED AGENCY AND MAKE THAT
16 REFERRAL FOR THAT FAMILY TO BE SERVICED.

17 Q. WHAT WAS THE NAME OF ONE OF THE AGENCIES WITH
18 LANGUAGE SPECIALTY YOU REFERRED FAMILIES TO?

19 A. CONCILIO.

20 Q. DID YOU EVER REFER FAMILIES FOR GEOGRAPHIC
21 REASONS?

22 A. YES. WE HAD TO REFER FAMILIES FOR GEOGRAPHICAL
23 REASONS. PERHAPS A CHILD WAS IN A SPECIFIC SCHOOL
24 DISTRICT AND WE WANTED TO KEEP THEM IN THAT SCHOOL
25 DISTRICT, OR EVEN FOR SAFETY REASONS, IF A PARENT WAS IN

1 A CERTAIN NEIGHBORHOOD AND WE WANTED TO REFER THEM OUT,
2 THE FAMILIES WOULD REFER THEM OUT TO A DIFFERENT AGENCY
3 IN ANOTHER NEIGHBORHOOD.

4 Q. DID YOU EVER REFER FAMILIES FOR BEHAVIORAL
5 HEALTH SPECIALTY REASONS?

6 A. YES. YES, WE HAD TO DO THAT AS WELL. AGAIN, IF
7 OUR AGENCY WAS NOT ABLE TO COPE WITH THAT CHILD OR THE
8 FAMILY WAS UNABLE TO COPE WITH IT AND NEEDED SPECIALIZED
9 -- AND THAT CHILD NEEDED SPECIALIZED SERVICES, WE WOULD
10 REFER OUT TO A DIFFERENT AGENCY.

11 Q. WERE YOU AWARE OF REFERRALS ALSO BEING MADE FOR
12 SPECIALIZED MEDICAL NEEDS OF A CHILD?

13 A. YES, MEDICAL WOULD BE THE SAME.

14 Q. DID DHS EVER PENALIZE OR SANCTION YOU FOR
15 ENGAGING IN THESE REFERRALS?

16 A. NO.

17 Q. DID YOU THINK THAT YOU WERE DOING ANYTHING OUT
18 OF THE ORDINARY WHEN YOU MADE THESE SORTS OF REFERRALS?

19 A. NO. REFERRALS ARE MADE ALL THE TIME.

20 Q. WHEN A NEW PROSPECTIVE FOSTER FAMILY APPROACHES
21 AN AGENCY AND COMES TO THEM THROUGH THE INTAKE PROCESS,
22 IS THAT A DHS REFERRAL TO THE AGENCY?

23 A. NO, THAT'S AN INDEPENDENT REFERRAL, LIKE A SELF
24 REFERRAL, IT'S NOT AN DHS REFERRAL.

25 Q. SO THAT'S A SEPARATE PIPELINE FOR OBTAINING

1 FAMILIES?

2 A. YES. DHS DID NOT REFER ME TO BE A FOSTER
3 PARENT, I SELF REFERRED MYSELF.

4 Q. DO YOU HAVE ANY EXPERIENCE WITH HOW FOSTER CARE
5 PLACEMENT WORKS FOR NATIVE AMERICAN CHILDREN IN
6 PENNSYLVANIA?

7 A. YES. I HAVE HAD PERSONAL EXPERIENCE WITH THAT,
8 SO PRIOR TO ME BECOMING A FOSTER PARENT WITH CATHOLIC
9 SOCIAL SERVICES, I HAVE NATIVE AMERICAN HERITAGE, I WAS
10 THINKING ABOUT ADOPTING OR FOSTERING A NATIVE AMERICAN
11 CHILD AND BECAUSE I CANNOT CERTIFY MYSELF AS A NATIVE
12 AMERICAN, I WAS UNABLE TO DO THAT.

13 Q. AND WAS YOUR EXPERIENCE THAT YOU COULD HAVE GONE
14 TO ANY AGENCY TO TRY AND FOSTER A NATIVE AMERICAN CHILD?

15 A. NO, I CANNOT. I CANNOT.

16 Q. SO WHAT WOULD HAPPEN IF YOU WENT TO AN AGENCY,
17 ANY AGENCY IN PHILADELPHIA, FOR EXAMPLE, TRYING TO
18 FOSTER A NATIVE AMERICAN CHILD?

19 A. I WOULD NOT BE ABLE TO DO THAT BECAUSE I CANNOT
20 CERTIFY MYSELF AS A NATIVE AMERICAN.

21 Q. WHAT WOULD THE AGENCY DO FOR YOU?

22 A. REFER ME TO -- YOU KNOW, I WAS NOT DENIED TO
23 BECOME A FOSTER PARENT, BUT I CANNOT BE A FOSTER PARENT
24 OF A NATIVE AMERICAN CHILD.

25 Q. IF YOU WENT TO AN AGENCY THAT SPECIALIZED IN

1 PLACING NATIVE AMERICAN CHILDREN, AGAIN, WHAT WOULD THAT
2 AGENCY DO FOR YOU?

3 A. REFER ME OUT.

4 Q. AS A FOSTER PARENT, DID YOU EVER WORK WITH GAY
5 -- OR EXCUSE ME. AS A FOSTER WORKER, DID YOU EVER WORK
6 WITH GAY FOSTER PARENTS?

7 A. YES.

8 Q. WHAT WAS YOUR EXPERIENCE WITH THAT FAMILY?

9 A. I HAD A SPECIFIC FAMILY, A MALE FOSTER PARENT.
10 HE HAD THREE YOUNG BOYS. I THOUGHT HE WAS AN EXCELLENT
11 FOSTER PARENT. TOOK VERY WELL -- YOU KNOW, TOOK VERY
12 GOOD CARE OF THOSE BOYS.

13 Q. I WANT TO TALK TO YOU A LITTLE BIT ABOUT YOUR
14 INTERACTIONS WITH OTHER FOSTER AGENCIES DURING YOUR
15 CHILD ADVOCACY WORK. WHEN YOU WORKED AS A CHILD
16 ADVOCATE SOCIAL WORKER, DID YOU PERSONALLY INTERACT WITH
17 OTHER FOSTER AGENCIES IN PHILADELPHIA?

18 A. YES. YES, I HAVE.

19 Q. WHICH AGENCIES DID YOU INTERACT WITH?

20 A. PRETTY MUCH ALL OF THEM.

21 Q. FROM YOUR INTERACTIONS, WHAT DID YOU PERSONALLY
22 OBSERVE ABOUT THE QUALITY OF CARE THAT THESE AGENCIES
23 WERE PROVIDING?

24 MS. CORTES: YOUR HONOR, I WOULD OBJECT
25 TO RELEVANCE.

1 THE COURT: SUSTAINED.

2 BY MS. BARCLAY:

3 Q. DID YOU EVER OBSERVE WAYS IN WHICH CATHOLIC
4 SOCIAL SERVICES PROVIDED SERVICES THAT WERE BENEFICIAL
5 FOR CHILDREN?

6 A. YES.

7 Q. CAN YOU GIVE SOME EXAMPLES OF THAT FROM YOUR
8 PERSONAL EXPERIENCE?

9 A. AS A PROFESSIONAL AND ALSO AS A FOSTER MOTHER, I
10 RECEIVED A GREAT DEAL OF SUPPORT, A GREAT DEAL OF CARE.
11 IF I HAVE A PROBLEM OR DIFFICULTY OR JUST NEED TO VENT,
12 I CAN CONTACT MY SOCIAL WORKER, MY SUPERVISOR, MY
13 DIRECTOR AT ANY TIME.

14 Q. HOW WOULD YOU DESCRIBE THE CONTINUITY OF STAFF
15 AND HOW THAT IMPACTED CHILDREN AT CATHOLIC SOCIAL
16 SERVICES?

17 A. I HAVE WORKED WITH CATHOLIC SOCIAL SERVICES FOR
18 A VERY LONG TIME, BOTH PROFESSIONALLY AND AS A FOSTER
19 PARENT, AND THERE IS A GREAT DEAL OF CONTINUITY. I HAVE
20 NOT EXPERIENCED ANY TURNOVER AT ALL IN STAFF, AND THAT
21 CERTAINLY HELPS THE CHILDREN BECAUSE THEY SEE THE SAME
22 FACES, THEY ARE ABLE TO CREATE BONDS WITH THE WORKERS
23 AND ALSO THE FOSTER PARENTS BECAUSE THEY KNOW WHO THEY
24 ARE GOING TO BE ABLE TO CONTACT.

25 Q. AS A CHILD ADVOCATE SOCIAL WORKER, WERE YOU EVER

1 AWARE OF INSTANCES WHERE CITY ATTORNEYS WOULD NOT SPEAK
2 WITH YOU ABOUT A CHILD'S CASE?

3 A. NO.

4 Q. THAT WAS NOT SOMETHING YOU OBSERVED TO BE A
5 COMMON PRACTICE?

6 A. NO, I HAD VERY GOOD RELATIONSHIPS WITH THE DHS
7 ATTORNEYS.

8 Q. WERE PEOPLE YOU INTERACTED WITH GENERALLY AWARE
9 OF THE RELIGIOUS NATURE OF CATHOLIC SOCIAL SERVICES?

10 A. YES.

11 MS. CORTES: OBJECTION, SPECULATION AS
12 WELL, YOUR HONOR.

13 THE COURT: OVERRULED.

14 BY MS. BARCLAY:

15 Q. HOW LONG -- LET'S TALK ABOUT YOUR TIME AS A
16 FOSTER PARENT. HOW LONG HAVE YOU BEEN A FOSTER PARENT?

17 A. FOR APPROXIMATELY TWO-AND-A-HALF YEARS.

18 Q. CAN YOU TELL US ABOUT WHAT INFLUENCED YOUR
19 DECISION TO BECOME A FOSTER PARENT?

20 A. MY WORK AS A PROFESSIONAL AND ALSO MY PERSONAL
21 INABILITY TO HAVE CHILDREN. AND ALSO MY BELIEF THAT --
22 I BELIEVE THAT GOD PLACED IT IN MY HEART AS A CALLING.

23 Q. WHAT INFLUENCED YOUR DECISION TO CHOOSE CATHOLIC
24 SOCIAL SERVICES?

25 A. MY PROFESSIONAL WORK WITH THEM AND ALSO MY

1 CATHOLIC BELIEFS. I KNEW THAT WE WOULD SHARE THE SAME
2 FOUNDATIONAL BELIEFS.

3 Q. CAN YOU DESCRIBE SOME OF THE SUPPORT YOU HAVE
4 RECEIVED FROM CATHOLIC SOCIAL SERVICES AND HOW THAT HAS
5 BEEN IMPORTANT FOR YOU?

6 A. AGAIN, I KNOW THAT I CAN CALL ANYONE ON MY TEAM
7 AT ANY HOUR OF THE DAY AND SOMETIMES AT NIGHT, OR TEXT
8 THEM AND I KNOW THAT THEY ARE GOING TO BE THERE. I KNOW
9 IF I MY CALL WORKER, HE IS GOING TO COME AS SOON AS HE
10 CAN. HE WILL SPEND ANYWHERE BETWEEN A HALF AN HOUR TO A
11 COUPLE OF HOURS IF HE NEEDS TO OR IF HE WANTS TO, JUST
12 PLAYING WITH MY BOYS OR BEING THERE FOR ME AS A SUPPORT.

13 Q. ARE YOU CURRENTLY CARING FOR FOSTER CHILDREN?

14 A. I HAVE TWO YOUNG BOYS. I HAVE A TWO YEAR OLD
15 WHO HAS BEEN WITH ME FOR 16 MONTHS AND I HAVE A -- HE
16 WILL BE FIVE MONTHS OLD ON THE 21ST OF THIS MONTH AND HE
17 HAS BEEN WITH ME SINCE HE WAS THREE DAYS OLD. THEY ARE
18 SIBLINGS.

19 Q. ARE YOU INTERESTED IN FOSTERING ADDITIONAL
20 CHILDREN IN THE FUTURE?

21 A. I WOULD, YES. I WOULD BE VERY OPEN.

22 Q. WOULD YOU BE OPEN TO FOSTERING SIBLINGS OF YOUR
23 BOYS?

24 A. YES.

25 Q. ARE THERE THINGS THAT YOU HAVE EXPERIENCED

1 CATHOLIC SOCIAL WORKERS TO DO TO HELP YOUR BOYS TO LOVE,
2 TO BE CARED FOR?

3 A. YES. AGAIN, WHEN MY WORKER COMES, HE SPENDS
4 TIME WITH MY BOYS, HE PLAYS WITH THEM, HE INTERACTS WITH
5 THEM. AND HE -- I BELIEVE MY BOYS HAVE A BOND WITH HIM.
6 WHEN MY TWO-YEAR OLD SEES MY WORKER COMING, HE RUNS TO
7 HIM. HE DOES NOT RUN TO MANY PEOPLE, SO THAT'S A GOOD
8 THING.

9 Q. DO YOU WORK WITH CUA AS WELL?

10 A. I DO.

11 Q. WHICH CUA DO YOU WORK WITH?

12 A. NET CUA 7.

13 Q. IS THAT CUA AFFILIATED WITH CATHOLIC SOCIAL
14 SERVICES?

15 A. NO.

16 Q. HOW DID YOUR RELATIONSHIP WITH SOCIAL WORKERS AT
17 THAT CUA DIFFER, IF AT ALL?

18 MS. CORTES: OBJECTION, RELEVANCE.

19 MS. BARCLAY: YOUR HONOR, THIS IS
20 RELEVANT TO THE TYPE OF HARM THAT MS. SIMMS-BUSCH WILL
21 EXPERIENCE IF SHE IS NO LONGER ABLE TO HAVE SOME OF
22 THESE UNIQUE RELATIONSHIPS WITH HER SOCIAL WORKERS AT
23 CATHOLIC SOCIAL SERVICES.

24 THE COURT: OVERRULE.

25 AND CAN YOU SPECIFICALLY SAY WHAT CUA IS?

1 THERE'S A LOT OF ACRONYMS.

2 BY MS. BARCLAY:

3 Q. COULD YOU STATE AGAIN WHICH CUA YOU WORK WITH?

4 A. NET CUA 7, NORTHEAST CUA 7, CUA, COMMUNITY
5 UMBRELLA AGENCY.

6 THE COURT: AND WHAT DOES CUA STAND FOR?

7 THE WITNESS: COMMUNITY UMBRELLA AGENCY,
8 YOUR HONOR.

9 THE COURT: OKAY.

10 THE WITNESS: IT'S AN AGENCY WHICH DHS
11 HAS CREATED IN ORDER TO SUPERVISE CHILDREN IN THEIR
12 FOSTER HOMES.

13 MS. CORTES: YOUR HONOR, WE WOULD RENEW
14 OUR OBJECTION TO THE RELEVANCE REGARDING THE CUA IN THIS
15 CASE, SINCE THEY ARE NOT PART OF THIS LAWSUIT AND MORE
16 SO IT DEALS WITH GEOGRAPHIC ISSUES.

17 MS. BARCLAY: YOUR HONOR, AGAIN, I JUST
18 WANT TO POINT OUT THE WAY IN WHICH HER RELATIONSHIP WITH
19 THE CATHOLIC SOCIAL SERVICES SOCIAL WORKER IS UNIQUE AND
20 COMPARE THAT TO RELATIONSHIPS WITH OTHER SOCIAL WORKERS.

21 THE COURT: I WILL OVERRULE THE
22 OBJECTION.

23 BY MS. BARCLAY:

24 Q. MS. SIMMS-BUSCH, HOW DOES YOUR RELATIONSHIP AND
25 THE RELATIONSHIP OF YOUR CHILDREN WITH YOUR CATHOLIC

1 SOCIAL WORKER DIFFER IF AT ALL FROM YOUR RELATIONSHIP
2 WITH THE SOCIAL WORKER AT THE CUA?

3 A. AGAIN, MY BOYS RUN TO MY CATHOLIC SOCIAL
4 SERVICES -- OR AT LEAST MY TWO-YEAR OLD RUNS TO MY
5 CATHOLIC SOCIAL SERVICES WORKER. HE INTERACTS WITH HIM.
6 THERE IS NO INTERACTION WITH MY CUA WORKER. I'VE
7 ACTUALLY -- IN THE TIME THAT I HAVE HAD MY BOYS THE LAST
8 16 MONTHS, I HAVE HAD FOUR CUA WORKERS. THERE IS NO
9 CONTINUITY, THERE IS NO CONTINUATION OF CARE. MY BOYS
10 HAVE NO RELATIONSHIP. THERE IS NO TIME TO BUILD A
11 RELATIONSHIP OR A BOND.

12 Q. AND IN YOUR EXPERIENCE, IS THE CONTINUITY WITH
13 THE SOCIAL WORKERS AT CATHOLIC SOCIAL SERVICES SOMETHING
14 UNIQUE?

15 A. ABSOLUTELY.

16 Q. HOW WOULD YOU BE IMPACTED AS A FOSTER MOTHER IF
17 CATHOLIC HAS TO CLOSE ITS FOSTER PROGRAM?

18 A. I HAVE NO IDEA. I WAS SITTING THERE LISTENING
19 TO THE OPENING ARGUMENTS AND DIDN'T REALIZE HOW CLOSE
20 THE DEADLINE WAS AND IT ALMOST BROUGHT TEARS TO MY EYES.
21 I HAVE NO IDEA WHAT IS GOING TO HAPPEN TO THE CARE OF MY
22 BOYS OR TO MYSELF OR WHAT DECISION I AM GOING TO HAVE TO
23 MAKE.

24 Q. HOW WILL YOU BE IMPACTED BY THE LOSS OF SUPPORT,
25 IF AT ALL?

1 A. I DON'T KNOW WHAT I WOULD DO.

2 Q. WOULD YOU BE ABLE TO CONTINUE AS A FOSTER PARENT
3 WITH A DIFFERENT AGENCY?

4 A. AGAIN, I AM SITTING HERE QUESTIONING THIS AS I
5 SIT HERE BECAUSE I CARE ABOUT MY BOYS SO MUCH, SO WHAT
6 -- IT'S LIKE I AM BEING BACKED INTO A CORNER. WHAT
7 CHOICE DO I HAVE?

8 Q. WOULD IT BE DIFFICULT FOR YOU AND A LOSS IF YOU
9 HAD TO CONTINUE AS A FOSTER PARENT WITH A DIFFERENT
10 AGENCY?

11 A. ABSOLUTELY.

12 Q. HOW HAVE YOU FELT OF THE WAY THAT THE CITY HAS
13 TREATED CATHOLIC SOCIAL SERVICES OVER THE LAST FEW
14 MONTHS?

15 MS. CORTES: OBJECTION, YOUR HONOR.

16 THE COURT: SUSTAINED.

17 MS. BARCLAY: THANK YOU, MS. SIMMS-BUSCH.
18 NO FURTHER QUESTIONS.

19 THE WITNESS: THANK YOU.

20 THE COURT: CROSS-EXAMINE.

21 MS. BARCLAY: YOUR HONOR, PLAINTIFFS
22 WOULD LIKE TO CALLS SHARONELL FULTON.

23 THE COURT: CROSS-EXAMINE.

24 MS. BARCLAY: SORRY.

25 CROSS EXAMINATION

1 BY MS. CORTES:

2 Q. GOOD AFTERNOON, MS. BUSCH.

3 A. GOOD AFTERNOON.

4 Q. MS. BUSCH, YOU HAD TESTIFIED EARLIER ABOUT YOUR
5 PRIOR EXPERIENCE WITHIN THE FOSTER CARE AGENCY, IS THAT
6 CORRECT?

7 A. THAT IS CORRECT.

8 Q. AND YOU HAD TESTIFIED EARLIER ABOUT CHILDREN
9 BEING RELOCATED AND RESPITE AND THAT'S -- DO YOU RECALL
10 THAT TESTIMONY?

11 A. YES, MA'AM.

12 Q. I DIDN'T GET THE DATE. CAN YOU TELL US WHEN YOU
13 EXPERIENCED THAT?

14 A. THAT WAS APPROXIMATELY -- IT WAS A LITTLE OVER
15 TEN YEARS AGO.

16 Q. OKAY.

17 A. YES.

18 Q. AND DESPITE YOUR -- YOU HAVE ONLY BEEN A FOSTER
19 PARENT WITH CATHOLIC SOCIAL SERVICES, IS THAT CORRECT?

20 A. YES.

21 Q. YOU HAVE NOT BEEN A FOSTER PARENT WITH ANY OTHER
22 OF -- ANY OF THE OTHER 30 AGENCIES IN THE CITY, CORRECT?

23 A. NO, WHEN I --

24 Q. OKAY, THANK YOU.

25 AND JUST FOCUSING ON SOME -- YOU ARE

1 FAMILIAR WITH THE CERTIFICATION PROCESS THAT YOU HAD TO
2 GO THROUGH TO BE A FOSTER PARENT?

3 A. YES, MA'AM.

4 Q. DO YOU PERFORM ANY OF THE CERTIFICATIONS FOR ANY
5 NEW FOSTER FAMILY FOR CSS?

6 A. NO, MA'AM.

7 Q. OKAY.

8 MS. CORTES: COURT'S INDULGENCE, YOUR
9 HONOR.

10 (BRIEF PAUSE IN THE PROCEEDING.)

11 BY MS. CORTES:

12 Q. I THINK IT'S ONE LAST QUESTION.

13 YOU MENTIONED THAT A FOSTER AGENCY HAD
14 CLOSED IN YOUR EXPERIENCE AS A SOCIAL WORKER?

15 A. YES, MA'AM.

16 Q. CAN YOU TELL US WHAT WAS THE NAME OF THAT FOSTER
17 AGENCY?

18 A. YES, IT WAS PSI FAMILY SERVICES. IT WAS LOCATED
19 AT 701 MARKET STREET IN PHILADELPHIA.

20 Q. AND WHEN DID THAT HAPPEN?

21 A. AGAIN, A LITTLE OVER TEN YEARS AGO. I'M SORRY,
22 I DON'T HAVE THE SPECIFIC DATE.

23 Q. OKAY, THAT'S FINE.

24 MS. CORTES: THANK YOU.

25 MS. BARCLAY: BRIEF REDIRECT, YOUR HONOR?

1 THE COURT: YES.

2 REDIRECT

3 BY MS. BARCLAY:

4 Q. MS. SIMMS-BUSCH, YOU HAVE ONLY BEEN A FOSTER
5 PARENT WITH CATHOLIC SOCIAL SERVICES, CORRECT?

6 A. YES.

7 Q. HAVE YOU HAD EXPERIENCES WITH ALL THE OTHER
8 FOSTER AGENCIES IN PHILADELPHIA?

9 A. YES, I HAVE.

10 MS. CORTES: OBJECTION TO THE RELEVANCE,
11 YOUR HONOR.

12 MS. BARCLAY: YOUR HONOR, THIS IS GOING
13 TO BE RELEVANT TO WHY --

14 THE COURT: OVERRULED.

15 MS. BARCLAY: THANK YOU, YOUR HONOR.

16 BY MS. BARCLAY:

17 Q. DO YOU HAVE EXPERIENCE WITH ALL THE OTHER FOSTER
18 AGENCIES IN PHILADELPHIA?

19 A. YES, I HAVE.

20 Q. AND THAT WAS AS A CHILD ADVOCATE SOCIAL WORKER?

21 A. YES, AS A CHILD ADVOCATE SOCIAL WORKER, AS A
22 FOSTER CARE WORKER AS WELL.

23 Q. WAS YOUR EXPERIENCE WITH THE OTHER AGENCIES
24 RELEVANT TO YOUR DECISION TO CHOOSE CATHOLIC SOCIAL
25 SERVICES?

1 A. ABSOLUTELY.

2 Q. CAN YOU EXPLAIN THAT A LITTLE BIT?

3 A. YES. SO WHEN I DECIDED TO BECOME A FOSTER
4 PARENT, I --

5 MS. CORTES: YOUR HONOR, I WOULD OBJECT
6 THAT THIS GOES BEYOND THE SCOPE OF THE CROSS.

7 MS. BARCLAY: YOUR HONOR, SHE --

8 THE COURT: IT DOES NOT.

9 THE WITNESS: WHEN I LOOKED AT BECOMING A
10 FOSTER PARENT, I REVIEWED MY EXPERIENCE WITH OTHER
11 AGENCIES. I ACTUALLY WENT TO OTHER AGENCIES. I WENT TO
12 BETHANY CHRISTIAN SERVICES. I DID NOT FEEL THE SAME
13 RELATIONSHIP THAT I HAD, EVEN THOUGH PROFESSIONALLY I
14 HAD A RELATIONSHIP WITH BETHANY, I DID NOT FEEL THAT I
15 WOULD HAVE THE SAME SUPPORT OR RELATIONSHIP THAT I HAD
16 WITH CATHOLIC SOCIAL SERVICES. AND I HONESTLY DIDN'T
17 FEEL LIKE THE CORE BELIEFS WERE THERE. IT IS A
18 CHRISTIAN AGENCY, BUT IT WASN'T THE ONE THAT I FELT
19 CALLED TO.

20 BY MS. BARCLAY:

21 Q. WAS THERE ALSO ANYTHING ABOUT THE SUPPORT THAT
22 YOU ANTICIPATED YOU WOULD RECEIVE FROM CATHOLIC SOCIAL
23 SERVICES THAT WAS RELEVANT TO YOUR DECISION?

24 A. YES, I KNEW THAT I WOULD RECEIVE SUPPORT THERE
25 BECAUSE AGAIN OF MY PROFESSIONAL RELATIONSHIPS THAT I

1 HAD BUILT.

2 MS. BARCLAY: NO FURTHER QUESTIONS, YOUR
3 HONOR.

4 THE COURT: ANY OTHER QUESTIONS?

5 MS. CORTES: NO, YOUR HONOR.

6 THE COURT: THANK YOU.

7 THE WITNESS: THANK YOU, YOUR HONOR.

8 THE COURT: NOW YOU MAY CALL YOUR NEXT
9 WITNESS.

10 MS. BARCLAY: THE PLAINTIFFS CALL MS.
11 CECILIA PAUL, YOUR HONOR.

12 (WITNESS SWORN.)

13 THE WITNESS: MY NAME IS CECILIA,
14 C-E-C-I-L-I-A, PAUL, P-A-U-L.

15 DIRECT EXAMINATION

16 MS. BARCLAY:

17 Q. GOOD AFTERNOON, MS. PAUL.

18 A. GOOD AFTERNOON.

19 Q. CAN YOU TELL US WHAT YOUR CURRENT RELATIONSHIP
20 IS TO CATHOLIC SOCIAL SERVICES?

21 A. RIGHT NOW I AM A FOSTER PARENT WITH CATHOLIC
22 SOCIAL SERVICES, BUT HAVE NO CHILDREN BECAUSE OF THE
23 CONDITIONS THAT ARE GOING ON RIGHT NOW.

24 Q. IN WHAT CITY DO YOU CURRENTLY LIVE?

25 A. PHILADELPHIA.

1 Q. HOW LONG HAVE YOU LIVED IN PHILADELPHIA?

2 A. MY WHOLE LIFE.

3 Q. CAN YOU TELL US JUST A LITTLE BIT ABOUT YOUR
4 EDUCATIONAL BACKGROUND?

5 A. I HAD 16 YEARS OF CATHOLIC EDUCATION, GRADUATED
6 FROM VILLANOVA UNIVERSITY WITH A BSN.

7 Q. AND DID YOU HAVE ANY WORK EXPERIENCE THAT IS
8 RELEVANT?

9 A. YES. AFTER GETTING MY DEGREE, I WENT TO
10 CHILDREN'S HOSPITAL OF PHILADELPHIA, WORKED THERE FOR
11 TWO YEARS. THEN HAD MY OWN FAMILY AND STAYED IN THE
12 HOME. MISSED NURSING VERY, VERY MUCH BECAUSE IT'S AN
13 AVOCATION AND THEN HEARD ABOUT FOSTERING IN CATHOLIC
14 SOCIAL SERVICES.

15 Q. LET'S TALK ABOUT YOUR TIME AS A FOSTER PARENT.
16 HOW LONG HAVE YOU BEEN A FOSTER PARENT?

17 A. I HAVE BEEN A FOSTER PARENT FOR 46 YEARS.

18 Q. HOW MANY CHILDREN APPROXIMATELY HAVE YOU
19 FOSTERED?

20 A. I HAVE FOSTERED 133 CHILDREN.

21 Q. DID YOU EVER ADOPT ANY OF THESE CHILDREN?

22 A. I HAVE ADOPTED SIX.

23 Q. HAVE YOU EVER BEEN RECOGNIZED FOR YOUR CARE BY
24 THE CITY?

25 A. YES. THREE YEARS AGO IN MAY I RECEIVED A --

1 WHATEVER, A CERTIFICATE STATING THAT THEY RECOGNIZED ME
2 AS A LOVING, CARING FOSTER PARENT.

3 MS. BARCLAY: AND MAY I HAVE PERMISSION
4 TO APPROACH THE WITNESS, YOUR HONOR?

5 THE COURT: YES.

6 BY MS. BARCLAY:

7 Q. MS. PAUL, I HAVE HANDED YOU WHAT HAS BEEN MARKED
8 AS PLAINTIFF'S EXHIBIT 1. DO YOU RECOGNIZE THIS
9 DOCUMENT?

10 A. YES, I DO.

11 Q. WHAT IS THIS DOCUMENT?

12 A. I DIDN'T HEAR WHAT YOU SAID.

13 Q. WHAT IS THIS DOCUMENT?

14 A. IT'S A DOCUMENT, A CERTIFICATE OF APPRECIATION
15 FROM THE CITY OF PHILADELPHIA ISSUED BY DHS, THE
16 COMMISSIONER AT THAT TIME WAS VANESSA HARLEY WHO
17 PRESENTED IT TO ME ON MAY 26, 2015.

18 Q. WHAT DOES THE AWARD SAY THAT IT WAS FOR?

19 A. EXCUSE ME?

20 Q. WHAT DOES THE AWARD SAY THAT --

21 A. THE AWARD SAYS, FOR ANSWERING THE CALL OF OUR
22 MOST VULNERABLE CHILDREN, FOR HELPING TO RIGHT THE
23 WRONGS, FOR BEING A SHOULDER TO CRY ON, AND MOST
24 IMPORTANTLY FOR PROVIDING PHILADELPHIA'S FOSTER CHILDREN
25 WITH LOVE, COMPASSION AND RESPECT THEY DESERVE. YOU

1 MAKE THE DIFFERENCE IN THE LIVES OF CHILDREN AND YOUTH.

2 MS. BARCLAY: YOUR HONOR, MAY I HAVE
3 PERMISSION TO ENTER THIS AS EXHIBIT 1 FOR THE PLAINTIFFS
4 INTO THE RECORD?

5 THE COURT: YES.

6 BY MS. BARCLAY:

7 Q. MS. PAUL, WHAT INFLUENCED YOUR DECISION TO
8 BECOME A FOSTER PARENT?

9 A. HAVING THE CATHOLIC BACKGROUND, I CHOSE CATHOLIC
10 SOCIAL SERVICES FOR THE CARING THAT THEY GIVE CHILDREN,
11 FOR THE COMMITMENT THEY GIVE CHILDREN, AND THE BELIEFS
12 THAT I BELIEVE IN AND THEY DO TOO.

13 Q. WHAT INFLUENCED YOUR DECISION TO BECOME A FOSTER
14 PARENT, GENERALLY?

15 A. BECAUSE I FEEL THAT I HAVE BEEN GIVEN A GIFT
16 FROM GOD TO HELP CHILDREN AND CARE FOR THEM AND LOVE
17 THEM ALONG WITH MY OWN CHILDREN WHO ALSO ACCEPT THEM AND
18 LOVE THEM.

19 Q. IN ADDITION TO YOUR -- YOU MENTIONED EARLIER
20 THAT YOU HAD A PEDIATRIC NURSING BACKGROUND. WAS THAT
21 RELEVANT AT ALL?

22 A. CERTAINLY, BECAUSE I HAD A LOT OF TRAINING WITH
23 CHILDREN, ESPECIALLY AT CHILDREN'S HOSPITAL, AND WANTED
24 TO KEEP THAT GOING. EVEN THOUGH I COULDN'T DO IT ON A
25 PROFESSIONAL LEVEL AS A NURSE IN A HOSPITAL, I COULD DO

1 IT IN MY HOME.

2 Q. CAN YOU TELL US ABOUT THE TYPE OF SUPPORT YOU
3 RECEIVED FROM CATHOLIC SOCIAL SERVICES?

4 A. THE KIND OF SUPPORT I RECEIVED FROM THEM IS
5 EXCELLENT. THEY ARE ALWAYS THERE FROM -- FOR ME NO
6 MATTER WHAT KIND OF QUESTION I MIGHT HAVE, THEY ARE
7 ALWAYS THERE TO ANSWER AND CARE -- YOU KNOW, COME OUT.
8 IF I NEED THEIR HELP FACE-TO-FACE OR ON THE PHONE, THEY
9 ARE THERE.

10 Q. ARE YOU CURRENTLY RECEIVING NORMAL REFERRALS FOR
11 FOSTER CHILDREN?

12 A. NO.

13 Q. WHEN DID THE LAST FOSTER CHILD LEAVE YOUR HOME?

14 A. IN EARLY APRIL.

15 Q. SO YOU HAVE NOT RECEIVED ANY NORMAL FOSTER CARE
16 REFERRALS SINCE APRIL?

17 A. NO REFERRALS, NO.

18 Q. HAVE YOU EVER GONE WITHOUT FOSTER CARE REFERRALS
19 FOR THIS LONG?

20 A. NOT USUALLY, NO.

21 Q. HOW HAVE YOU FELT NOT BEING ABLE TO CARE FOR
22 FOSTER CHILDREN?

23 A. I FEEL VERY LOST, VERY LOST BECAUSE I CAN'T USE
24 THE TALENT THAT WAS GIVEN TO ME TO HELP WITH THESE
25 CHILDREN WHO ARE OUT THERE, MAINLY INFANTS THAT I GET

1 WHO ARE DRUG ADDICTED, WHO COME INTO MY HOME AND NEED A
2 LOT OF CARE, WHICH I AM MORE THAN HAPPY TO GIVE, AND MY
3 FAMILY ALSO IS INVOLVED IN GIVING, AND NOT ABLE TO DO IT
4 LEAVES ME VERY UPSET.

5 Q. HAVE YOU EVER FOSTERED TEEN CHILDREN IN THE
6 PAST?

7 A. YES, I HAVE.

8 Q. ARE YOU INTERESTED IN FOSTERING ANY ADDITIONAL
9 CHILDREN IN THE FUTURE?

10 A. I AM, YES.

11 Q. HOW WOULD IT IMPACT YOU IF CATHOLIC SOCIAL
12 SERVICES HAD TO CLOSE ITS FOSTER CARE PROGRAM?

13 A. I WOULD REALLY HAVE TO GIVE IT A LOT OF THOUGHT.
14 I DON'T KNOW WHETHER I COULD BE ABLE TO GO TO ANOTHER
15 AGENCY. THEY ARE LIKE FAMILY TO ME, CATHOLIC SOCIAL
16 SERVICES. AND THAT'S HARD TO START OVER AGAIN AND HAVE
17 THAT FEELING THAT I HAVE FOR THEM.

18 Q. HOW DO YOU THINK YOU WOULD BE AFFECTED BY THE
19 LOSS OF SERVICES THAT YOU RELY ON?

20 A. FROM CATHOLIC SOCIAL SERVICES YOU MEAN?

21 Q. YES.

22 A. I DON'T KNOW. I DON'T WHAT KIND OF SERVICE I
23 COULD RECEIVE FROM OTHER AGENCIES BECAUSE I DON'T KNOW
24 -- YOU KNOW, OTHER AGENCIES. THIS IS THE ONLY ONE I
25 HAVE EVER WORKED WITH.

1 Q. WOULD IT BE A LOSS TO YOU THE RELATIONSHIPS THAT
2 YOU HAVE?

3 A. IF I WOULD CHOOSE -- YES, IT IS, JUST TO END IT,
4 THAT'S AN ENDING AND THAT WOULD BE VERY, VERY HARMFUL.

5 MS. BARCLAY: NO FURTHER QUESTIONS, YOUR
6 HONOR.

7 THE COURT: CROSS-EXAMINE

8 MS. CORTES: NO QUESTIONS.

9 THE COURT: OKAY. THANK YOU, MA'AM, YOU
10 MAY STEP DOWN.

11 THE WITNESS: THANK YOU.

12 MS. BARCLAY: PLAINTIFFS WOULD LIKE TO
13 CALL MRS. SHARONELL FULTON TO THE STAND.

14 MS. CORTES: YOUR HONOR, I WOULD LIKE TO
15 ASK FOR AN OFFER OF PROOF AT THIS POINT.

16 THE COURT: CAN YOU PROVIDE COUNSEL WITH
17 A PRIVATE OFFER?

18 (BRIEF PAUSE IN THE PROCEEDING.)

19 THE COURT: ARE WE READY TO PROCEED?

20 MS. BARCLAY: YES, YOUR HONOR.

21 (WITNESS SWORN.)

22 THE WITNESS: MY NAME IS SHARONELL,
23 S-H-A-R-O-N-E-L-L, LAST NAME FULTON, F-U-L-T-O-N.

24 DIRECT EXAMINATION

25 BY MS. BARCLAY:

1 Q. MS. FULTON, WHAT IS YOUR CURRENT RELATIONSHIP TO
2 CATHOLIC SOCIAL SERVICES?

3 A. I AM CURRENTLY A FOSTER PARENT WITH CATHOLIC
4 SOCIAL SERVICES.

5 Q. AND WHAT CITY DO YOU CURRENTLY LIVE?

6 A. PHILADELPHIA.

7 Q. AND HOW LONG HAVE YOU LIVED THERE?

8 A. MOST OF MY LIFE.

9 Q. HOW LONG HAVE YOU BEEN A FOSTER PARENT?

10 A. FOR 26 YEARS.

11 Q. AND HOW MANY CHILDREN HAVE YOU FOSTERED OVER THE
12 YEARS?

13 A. 40.

14 Q. HOW DID YOUR RELIGIOUS BELIEFS IF AT ALL
15 MOTIVATE YOUR DESIRE TO BECOME A FOSTER PARENT?

16 A. WELL, I STARTED THINKING ABOUT IT IN THE EARLY
17 '90'S AND I KEPT SEEING THE COMMERCIAL. SO BECAUSE I AM
18 CATHOLIC, I WENT TO CHURCH AND I PRAYED ABOUT IT AND I
19 BELIEVE THAT IT WAS MY FAITH THAT LED ME TO IT.

20 Q. WHAT LED YOU TO CHOOSE CATHOLIC SOCIAL SERVICES
21 AS THE AGENCY THAT YOU WORK WITH?

22 A. WELL, BECAUSE I WENT TO CHURCH, I GO TO A
23 CATHOLIC CHURCH AND I HAVE FOR 55 YEARS, SO I DECIDED
24 THAT I WOULD START THERE BECAUSE THEY SHARE THE VALUES.
25 I SHARE THE SAME VALUES.

1 Q. CAN YOU TELL US A LITTLE BIT ABOUT, ASIDE FROM
2 THE SHARED VALUES, SOME OF THE SUPPORT THAT YOU RECEIVE
3 FROM CATHOLIC SOCIAL SERVICES?

4 A. WELL, WHEN I BECAME A FOSTER PARENT IN 1992, IT
5 WAS A LOT DIFFERENT THAN IT IS TODAY. THE SUPPORT WAS
6 THERE, IT WAS LIKE FAMILY. WHENEVER I HAD A PROBLEM,
7 AND YOU WILL HAVE PROBLEMS, I WAS ABLE TO CALL ANY HOUR
8 OF THE NIGHT. MRS. FULTON, YES. THIS IS HAPPENING,
9 THAT IS HAPPENING, HOW AM I SUPPOSED TO HANDLE THIS,
10 CHILDREN WANTING TO KILL ONE ANOTHER AND VARIOUS
11 DIFFERENT PROBLEMS. I ALWAYS GOT THE SUPPORT THAT I
12 NEEDED, AND THE RESPECT.

13 Q. WHAT SORT OF TRAINING HAVE YOU RECEIVED FROM
14 CATHOLIC SOCIAL SERVICES THAT HAS HELPED YOU ADDRESS
15 SPECIAL NEEDS OF CHILDREN YOU CARE FOR?

16 A. THEY ALWAYS OFFER IN-SERVICES THAT -- IT WAS
17 MANDATORY THAT WE TAKE AND THEY TRY TO SCHEDULE
18 EDUCATORS TO COME IN TO ADDRESS SOME OF THE MANY
19 PROBLEMS THAT THE FOSTER PARENT WAS HAVING.

20 Q. ARE YOU INTERESTED IN FOSTERING MORE CHILDREN IN
21 THE FUTURE?

22 A. YES.

23 Q. ARE YOU CURRENTLY CARING FOR ANY FOSTER
24 CHILDREN?

25 A. YES. I HAVE A BROTHER AND SISTER, 4 AND 5 YEARS

1 OLD, THAT HAVE BEEN WITH ME FOR NINE MONTHS.

2 Q. ARE THERE THINGS THAT CATHOLIC SOCIAL SERVICES
3 DOES TO HELP YOU CARE FOR THE SPECIAL NEEDS OF THESE
4 CHILDREN?

5 A. ABSOLUTELY. THEY SUPPORT ME, THEY PROVIDE ME
6 WITH RESOURCES, THEY PUSH ME IN THE DIRECTION WHERE I
7 CAN GET ADDITIONAL EDUCATION, AND THEY VISIT OFTEN.

8 Q. HAVE YOU EVER RECEIVED TRAINING FROM ANOTHER
9 AGENCY?

10 A. YES. SOME YEARS AGO I RECEIVED SERVICE FROM THE
11 DHS. THEY CALLED US ALL IN AND WE WENT IN FOR AN
12 IN-SERVICE THERE, AND I FELT VERY SAD BECAUSE THE FIRST
13 THING THE INSTRUCTOR SAID WAS, KEEP IN MIND THAT THESE
14 ARE NOT YOUR CHILDREN, YOU ARE JUST A SURROGATE. AND I
15 FELT THAT WAS VERY COLD TO START THE DAY BECAUSE I
16 THOUGHT OF MYSELF OF A LITTLE MORE THAN WHAT SHE WAS
17 PROJECTING.

18 Q. HOW IF AT ALL DID THAT COMPARE WITH HOW SOCIAL
19 WORKERS AT CATHOLIC TREAT YOU?

20 A. WELL, I KNOW THIS, WHEN WE HAVE SERVICES THERE,
21 WE START WITH PRAYER. AND TO ME THAT SETS THE PLATFORM
22 FOR A GOOD START.

23 Q. AND WHAT SORT OF RELATIONSHIPS DO YOU HAVE WITH
24 THE SOCIAL WORKERS AT CATHOLIC SOCIAL SERVICES?

25 A. I CARE ABOUT ALL OF THEM.

1 Q. HOW DO THEY TREAT YOU?

2 A. GOOD. GOOD. IT'S A FAMILY AFFAIR.

3 Q. DOES ANYONE YOU KNOW WORK WITH OTHER AGENCIES?

4 A. I KNOW MANY OTHER FOSTER PARENTS FOR BELONGING
5 TO PIN, PARENT INVOLVED NETWORK, AND THEY DON'T HAVE THE
6 SAME --

7 MS. CORTES: OBJECTION, YOUR HONOR,
8 SPECULATION.

9 THE COURT: SUSTAINED.

10 MS. CORTES: LACK OF PERSONAL KNOWLEDGE.
11 I ASK THAT HER ANSWER BE STRICKEN.

12 THE COURT: IT IS STRICKEN.

13 MS. BARCLAY: YOUR HONOR, THIS NOT BEING
14 OFFERED FOR THE TRUTH OF THE MATTER, BUT FOR THE
15 INFLUENCE IT IS GOING TO HAVE ON MS. FULTON AND HER
16 DECISIONS MOVING FORWARD AS FAR AS WHAT SHE CAN DO AS A
17 FOSTER PARENT.

18 THE COURT: SUSTAINED.

19 BY MS. BARCLAY:

20 Q. HOW WOULD YOU BE IMPACTED IF CATHOLIC SOCIAL
21 SERVICES HAD TO CLOSE ITS PROGRAM?

22 A. I HAVE BEEN THINKING ABOUT THIS AND I DON'T
23 KNOW. I WOULD BE DEVASTATED.

24 Q. HOW DO YOU THINK THE CHILDREN IN YOUR CARE COULD
25 BE IMPACTED IF CATHOLIC SOCIAL SERVICES HAD TO CLOSE THE

1 FOSTER PROGRAM?

2 MS. CORTES: OBJECTION, YOUR HONOR.

3 SPECULATION, LACK OF PERSONAL KNOWLEDGE. SHE IS ASKING
4 ABOUT --

5 THE COURT: I THINK SHE CAN ANSWER AS TO
6 WHAT MIGHT PHYSICALLY HAPPEN, BUT ANY KIND OF EMOTIONAL
7 IMPACT SHE CAN'T ANSWER.

8 MS. BARCLAY: IF I COULD PROFFER WHAT SHE
9 WOULD TALK ABOUT. SHE WAS GOING TO TALK ABOUT WHAT SHE
10 UNDERSTANDS HER THERAPIST HAS SAID ABOUT WHAT THE IMPACT
11 WOULD BE THE CHILDREN.

12 MS. CORTES: OBJECTION, YOUR HONOR.

13 THE COURT: SUSTAINED.

14 MS. BARCLAY: AND ALSO A TIME IN THE PAST
15 IMPACT, YOUR HONOR, THAT WE WILL DISCUSS AS FAR AS THE
16 EFFECT ON CHILDREN.

17 THE COURT: I AM SUSTAINING THE
18 OBJECTION.

19 BY MS. BARCLAY:

20 Q. WHAT YOU UNDERSTAND TO BE THE PHYSICAL IMPACT ON
21 THE CHILDREN IN YOUR CARE IF CATHOLIC SOCIAL SERVICES
22 CLOSED ITS PROGRAM?

23 A. WELL, THE TWO CHILDREN THAT I HAVE NOW WOULD BE
24 GREATLY IMPACTED BECAUSE WHEN I GOT THESE TWO LITTLE
25 SISTER AND BROTHER, THEY DIDN'T TRUST, THEY WOULD NOT

1 EAT, IT WAS AWAY FROM THEIR ORDINARY TO BE PLACED WITH
2 ME, BUT I HAD TO GAIN THEIR TRUST. I HAD --

3 THE COURT: THEY WOULD END UP MOVING?

4 THE WITNESS: YES, THEY WOULD END UP
5 MOVING.

6 BY MS. BARCLAY:

7 Q. WAS THERE A TIME IN THE PAST WHEN YOU WERE
8 WORRIED THAT ONE OF THE CHILDREN IN YOUR CARE MAY END UP
9 MOVING?

10 A. YES.

11 Q. WAS THERE ANY DIFFICULTY IN FINDING A POTENTIAL
12 PLACEMENT FOR HIM?

13 A. THERE WAS DIFFICULTY. I WAS TOLD THAT THEY DID
14 NOT HAVE A PLACEMENT FOR HIM AND YOU NORMALLY HAVE TO
15 GIVE 30 DAYS AND IT HAS BEEN SIX MONTHS.

16 Q. SO AFTER SIX MONTHS THE CITY WAS NOT AWARE OF
17 ANY OTHER POTENTIAL PLACEMENT FOR THIS CHILD?

18 A. NO.

19 MS. BARCLAY: NO FURTHER QUESTIONS, YOUR
20 HONOR.

21 THE COURT: CROSS-EXAMINE.

22 MS. CORTES: VERY BRIEFLY, YOUR HONOR.

23 CROSS-EXAMINATION

24 BY MS. CORTES:

25 Q. GOOD AFTERNOON, MS. FULTON.

1 A. GOOD AFTERNOON.

2 Q. MS. FULTON, YOU MENTIONED THAT YOU WERE AT A DHS
3 TRAINING?

4 A. YES.

5 Q. CAN YOU TELL US WHAT YEAR THAT WAS?

6 A. NOT REALLY. I WOULD SAY MORE THAN TEN YEARS
7 AGO.

8 Q. AND I TAKE IT THAT IF YOU -- IF IT WAS THAT LONG
9 AGO, YOU CANNOT TELL US WHAT PARTICULAR AGENCY WAS THE
10 TRAINING AGENCY?

11 A. IT WAS THROUGH DHS AND IT WAS AT THEIR
12 HEADQUARTERS AT THAT TIME.

13 Q. AND THAT'S ALL THE INFORMATION YOU CAN GIVE US?

14 A. WELL, IT WAS ABOUT UNDERSTANDING OUR POSITION AS
15 A FOSTER PARENT, AS I BELIEVE. AND THERE WERE MANY
16 OTHER FOSTER PARENTS THERE FROM ALL OVER THE CITY FOR
17 THAT PARTICULAR TRAINING. AND AS I SAID EARLIER, THE
18 INSTRUCTOR STARTED OUT WITH MORE OR LESS DISCIPLINING US
19 AND SAYING, JUST REMEMBER, THEY ARE NOT YOUR CHILDREN,
20 YOU ARE ONLY SURROGATES, AND I HONESTLY FELT SAD ABOUT
21 THAT.

22 MS. CORTES: OKAY. COURT'S INDULGENCE.

23 (BRIEF PAUSE IN THE PROCEEDING.)

24 MS. CORTES: NO FURTHER QUESTIONS.

25 THE COURT: THANK YOU, MA'AM.

1 THE WITNESS: THANK YOU.

2 MS. BARCLAY: NOTHING FURTHER FROM THE
3 PLAINTIFFS, YOUR HONOR.

4 THE COURT: OKAY. DOES THE CITY HAVE ANY
5 WITNESSES?

6 MR. FIELDS: WE DO, YOUR HONOR, BUT
7 BEFORE WE GET TO OUR WITNESSES, WE MOVE TO EXCLUDE THE
8 AFFIDAVITS OF BISHOP MCINTYRE, FROM JIM AMATO, JAMES
9 AMATO, AND THE AFFIDAVIT OF JAMES BLACK THAT WAS FILED
10 LATE LAST WEEK. THERE ARE A MYRIAD OF DISPUTED FACTS IN
11 THOSE AFFIDAVITS AS WELL AS AVERMENTS THAT WE HAVE A
12 RIGHT TO INQUIRE INTO.

13 THE COURT: OKAY, WE ARE GOING TO TAKE A
14 BRIEF RECESS, JUST ABOUT FIVE MINUTES. AND THEN WE WILL
15 COME BACK.

16 (BRIEF RECESS.)

17 THE COURT: OKAY, YOU MAY BE SEATED.

18 BEFORE WE BROKE THERE WAS A MOTION. CAN
19 YOU REPEAT THE MOTION, PLEASE?

20 MR. FIELD: SO I WAS MOVING TO EXCLUDE
21 THE AFFIDAVITS OF BISHOP MCINTYRE, JAMES AMATO AND JAMES
22 BLACK AS THERE ARE DISPUTED FACTS IN THOSE AND WE HAVE
23 NOT HAD AN OPPORTUNITY TO CROSS-EXAMINE THE WITNESSES.

24 MS. WINDHAM: YOUR HONOR, WITH REGARD TO
25 THE DECLARATIONS, THIS COURT HAS SET A NARROW TIME

1 WINDOW FOR THE HEARING. I BELIEVE THERE ARE AT LEAST
2 SEVEN DIFFERENT WITNESSES WHO HAVE SUBMITTED
3 DECLARATIONS ON THIS CASE. IF THE COURT WANTS TO CARRY
4 THIS HEARING OVER TO TOMORROW TO ALLOW ALL OF THOSE
5 WITNESSES, THAT'S SOMETHING THAT WE ARE HAPPY TO DO.
6 HOWEVER, I WOULD ALSO NOTE THAT FEDERAL RULES OF
7 EVIDENCE 65(B)(1)(A) SPECIFICALLY CONTEMPLATES EVIDENCE
8 COMING IN THROUGH AFFIDAVITS, JUST AS WE HAVE DONE HERE,
9 ON A TEMPORARY RESTRAINING ORDER. I ALSO NOTE THE 3RD
10 CIRCUIT'S DECISION IN KOS PHARMACY V. ANDRX CORP., 369
11 F.3D 700, WHICH SAYS A PRELIMINARY INJUNCTION IS
12 CUSTOMARILY GRANTED ON THE BASIS OF PROCEDURES THAT ARE
13 LESS FORMAL AND EVIDENCE LESS COMPLETE THAN A TRIAL ON
14 THE MERITS. THE CITY HAS HAD AMPLE OPPORTUNITY TO OFFER
15 ARGUMENTS AND OFFER ITS OWN WITNESSES. WE SEE NO REASON
16 TO EXCLUDE THE DECLARATIONS HERE.

17 THE COURT: THE COURT HAS NO PROBLEM WITH
18 CARRYING OVER THIS MATTER SO THAT THE WITNESSES CAN
19 TESTIFY UNDER THE CIRCUMSTANCES. SO YOU CAN MAKE A
20 CHOICE. EITHER WE HAVE THE WITNESSES TESTIFY OR THE
21 AFFIDAVITS WILL BE EXCLUDED.

22 MS. WINDHAM: YOUR HONOR, WE ARE HAPPY TO
23 CARRY OVER.

24 THE COURT: OKAY.

25 MS. WINDHAM: WE NEED TO CHECK WITH THE

1 WITNESSES TO SEE WHEN WE WOULD BE ABLE TO HAVE THEM HERE
2 FOR THE COURT.

3 THE COURT: OKAY. MY INTENTION IS TO
4 RESUME AT 1 O'CLOCK TOMORROW. I HAVE OTHER CASES
5 SCHEDULED, BUT I WILL MOVE THEM AROUND SO THAT WE CAN
6 FINISH THIS MATTER.

7 ARE THERE ANY WITNESSES THAT CAN BE
8 CALLED AT THIS POINT BY THE CITY SINCE THEY ARE HERE? I
9 UNDERSTAND THEY WILL BE OUT OF TURN, BUT...

10 MS. OLIVER: YES, YOUR HONOR.

11 THE COURT: OKAY. CALL YOUR WITNESS.

12 MS. OLIVER: THANK YOU, YOUR HONOR. GOOD
13 AFTERNOON. I CALL KIMBERLY ALI.

14 (WITNESS SWORN.)

15 THE WITNESS: MY NAME IS KIMBERLY ALI,
16 K-I-M-B-E-R-L-Y, A-L-I.

17 DIRECT EXAMINATION

18 BY MS. OLIVER:

19 Q. GOOD AFTERNOON, MS. ALI.

20 A. GOOD AFTERNOON.

21 Q. WHERE ARE YOU EMPLOYED?

22 A. I AM EMPLOYED AT THE PHILADELPHIA DEPARTMENT OF
23 HUMAN SERVICES.

24 Q. AND WHAT IS YOUR CURRENT POSITION?

25 A. I AM DEPUTY COMMISSIONER FOR CHILD WELFARE

1 OPERATIONS .

2 Q. TURNING TO YOUR EDUCATIONAL BACKGROUND, WILL YOU
3 PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND FOR THE
4 COURT?

5 A. YES. I HAVE A BACHELOR'S DEGREE IN CRIMINAL
6 JUSTICE FROM TEMPLE UNIVERSITY. I HAVE A MASTER'S
7 DEGREE IN SOCIAL WORK FROM TEMPLE UNIVERSITY, AND I AM
8 ALSO A LICENSED SOCIAL WORKER.

9 Q. WHEN DID YOU BEGIN YOUR EMPLOYMENT WITH THE
10 DEPARTMENT OF HUMAN SERVICES?

11 A. IN JANUARY OF 2000.

12 Q. AND WHAT POSITION DID YOU HOLD THEN?

13 A. I WAS A SOCIAL WORKER IN THE ONGOING SERVICE
14 REGION. AS A SOCIAL WORKER IN THAT REGION, I WAS
15 RESPONSIBLE FOR SERVICING FAMILIES THAT RECEIVED BOTH
16 IN-HOME SERVICES OR PLACEMENT SERVICES.

17 Q. AND THEREAFTER, DID YOU HOLD ANY OTHER POSITIONS
18 WITH THE DEPARTMENT?

19 A. YES. IN 2002 I BECAME A SUPERVISOR AT THE
20 DEPARTMENT OF HUMAN SERVICES IN THE ONGOING SERVICE
21 REGION. I WAS RESPONSIBLE FOR SUPERVISING FIVE SOCIAL
22 WORKERS WHO IN TURN WORKED WITH FAMILIES THAT RECEIVED
23 IN-HOME SERVICES AS WELL AS PLACEMENT SERVICES.

24 Q. AND HAVE YOU HELD ANY OTHER POSITIONS WITHIN THE
25 DEPARTMENT OF HUMAN SERVICES?

1 A. YES. FOUR YEARS LATER I WAS PROMOTED TO HUMAN
2 SERVICES PROGRAM ADMINISTRATOR FROM THE CENTRAL REFERRAL
3 UNIT AT DHS. IN THAT CAPACITY I WAS RESPONSIBLE FOR A
4 SECTION WHO IDENTIFIED BOTH IN-HOME SERVICES FOR
5 FAMILIES AS WELL AS PLACEMENT FOR CHILDREN AND YOUTH.

6 Q. AND AFTER THAT DID YOU HOLD ANY OTHER POSITIONS?

7 A. I DID. IN 2009 I WAS PROMOTED TO DIRECTOR OF
8 PROVIDER RELATIONS AND EVALUATION OF PROGRAMS AT DHS. I
9 WAS RESPONSIBLE FOR ABOUT 30 PROGRAM ANALYSTS AS WELL AS
10 SUPERVISORS WHO WERE RESPONSIBLE FOR EVALUATING AND
11 MONITORING PROVIDERS OVER -- APPROXIMATELY OVER 200
12 PROJECTED PROVIDERS, DELINQUENT PROVIDERS, DEPENDENT
13 PROVIDERS AS WELL AS PREVENTION PROVIDERS.

14 Q. AND BY THE WAY, SINCE YOUR FIRST POSITION AS A
15 SOCIAL WORKER, WERE ALL OF THESE SUBSEQUENT POSITIONS
16 PROMOTIONS THAT YOU RECEIVED?

17 A. YES, THEY WERE.

18 Q. AND WHAT IS THE NEXT PROMOTION THAT YOU
19 RECEIVED?

20 A. IN 2010 I BECAME THE OPERATION DIRECTOR FOR THE
21 CHILDREN AND YOUTH DIVISION AT DHS. IN THAT CAPACITY I
22 WAS RESPONSIBLE FOR CASES FROM THE HOTLINE, SO ALL CHILD
23 ABUSE AND NEGLECT REPORTS THAT CAME IN THROUGH THE
24 HOTLINE UP UNTIL CASES WERE CLOSED OUT THROUGH THE
25 DEPARTMENT.

1 Q. DID YOU RECEIVE ANY OTHER PROMOTIONS?

2 A. YES. IN 2014 I BECAME THE CHIEF IMPLEMENTATION
3 OFFICER FOR THE DEPARTMENT OF HUMAN SERVICES FOR
4 IMPROVING OUTCOMES FOR CHILDREN. I WAS RESPONSIBLE FOR
5 HELPING THE COMMUNITY UMBRELLA AGENCIES, OR CUA'S, BEGIN
6 TO RECEIVE THEIR SERVICES.

7 Q. MAY I STOP YOU FOR A MOMENT AND ASK YOU TO
8 EXPLAIN TO THE COURT THE TERM THAT YOU JUST USED,
9 IMPROVING OUTCOMES FOR CHILDREN?

10 A. YES. IMPROVING OUTCOMES FOR CHILDREN IS A
11 SYSTEM TRANSFORMATION THAT THE DEPARTMENT UNDERTOOK IN
12 2012 IN WHICH WE SEPARATED THE CITY INTO TEN
13 GEOGRAPHICAL AREAS. WE ISSUED AN RFP BECAUSE WE WANTED
14 COMMUNITY-BASED PROVIDERS TO PROVIDE CASE MANAGEMENT
15 SERVICES TO FAMILIES. AT THAT PARTICULAR TIME, PRIOR TO
16 IMPROVING OUTCOMES FOR CHILDREN, WE HAD A DUAL CASE
17 MANAGEMENT SYSTEM IN WHICH EVERY FAMILY HAD A DHS SOCIAL
18 WORKER AND A PROVIDER SOCIAL WORKER. WE FELT THAT IT
19 CAUSED A LOT OF CONFUSION FOR FAMILIES, SO WE MOVED TO A
20 SINGLE CASE MANAGEMENT SYSTEM IN 2013 IN WHICH FAMILIES
21 RECEIVED ONE CUA -- COMMUNITY UMBRELLA AGENCY CASE
22 MANAGER AS WELL AS WE DEVELOPED ONE SINGLE CASE PLAN FOR
23 FAMILIES.

24 Q. AND SO ESSENTIALLY THAT STREAMLINED THE PROCESS
25 FOR FAMILIES?

1 A. YES, IT DID.

2 Q. DID YOU HAVE ANY OTHER DUTIES AS THE CHIEF
3 IMPLEMENTATION OFFICER FOR IMPROVING OUTCOMES FOR
4 CHILDREN?

5 A. THE MAIN -- MY MAIN RESPONSIBILITY DURING THAT
6 TIME WAS TO ENSURE THAT CASES THAT CAME INTO THE FRONT
7 DOOR, IF THEY WERE ACCEPTED FOR SERVICES THROUGH THE
8 DEPARTMENT OF HUMAN SERVICES, THAT THEY WENT DIRECTLY TO
9 THE COMMUNITY UMBRELLA AGENCY SO THEY COULD PROVIDE CASE
10 MANAGEMENT SERVICES. ADDITIONALLY, WE HAD A NUMBER OF
11 CASES THAT WERE STILL IN OUR ONGOING SERVICE REGION. I
12 SUPERVISED TWO UNITS THAT WERE RESPONSIBLE FOR LOOKING
13 AT EACH CASE INDIVIDUALLY TO TRY TO DETERMINE THE NEEDS
14 OF THE CHILD AND THE FAMILY. IF THE CHILD AND THE
15 FAMILY CONTINUED TO NEED SERVICES THROUGH THE DEPARTMENT
16 OF HUMAN SERVICES, THEN WE TRANSFERRED THOSE CASES OVER
17 TO THE COMMUNITY UMBRELLA AGENCY. ANY CHILD WHO WAS
18 ABOUT TO ACHIEVE PERMANENCY, WE KEPT IT AT THE
19 DEPARTMENT OF HUMAN SERVICES SO THAT WE COULD ASSURE
20 THAT PERMANENCY WAS ACHIEVED FOR THAT CHILD.

21 Q. AND JUST VERY BRIEFLY, WHEN YOU REFERRED TO
22 PERMANENCY, WHAT ARE YOU REFERRING TO?

23 A. I AM REFERRING TO GOALS FOR CHILDREN AND YOUTH.
24 ANY CHILD OR YOUTH THAT COME INTO PLACEMENT WITH THE
25 DEPARTMENT IN WHICH THE DEPARTMENT OF HUMAN SERVICES HAS

1 LEGAL CUSTODY OF THAT CHILD, WE ESTABLISH A GOAL FOR
2 THAT PARTICULAR CHILD. THE GOAL CONSISTS OF
3 REUNIFICATION, THAT MEANS RETURNING A YOUNG PERSON TO
4 THAT PARTICULAR FAMILY. IF REUNIFICATION CANNOT OCCUR,
5 THEN THE NEXT HIERARCHY IN TERMS OF GOAL IS ADOPTION.
6 SO IDENTIFYING APPROPRIATE ADOPTIVE RESOURCES FOR THAT
7 CHILD OR YOUTH, AND THEN THE THIRD HIERARCHY IS
8 PERMANENT LEGAL CUSTODIANSHIP.

9 Q. THANK YOU.

10 WILL YOU TALK A LITTLE BIT ABOUT THE
11 STRUCTURED LEVEL OF CARE INSTRUMENT?

12 A. YES. UNDER MY LEADERSHIP AS THE CHIEF
13 IMPLEMENTATION OFFICER AT THE DEPARTMENT OF HUMAN
14 SERVICES, WE DEVELOPED -- WITH THE SUPPORT OF CASEY
15 FAMILY PROGRAMS, WE DEVELOPED A STRUCTURED LEVEL OF TOOL
16 INSTRUMENT. WHAT THAT INSTRUMENT IS USED FOR IS TO
17 DETERMINE THE APPROPRIATE LEVEL OF CARE FOR A CHILD OR A
18 YOUTH. IN DOING SO, WE GATHER REFERRAL INFORMATION THAT
19 IS COMPLETED BY THE CUA CASE MANAGER OR THE DHS SOCIAL
20 WORKER, WE IN PARTNERSHIP WITH COMMUNITY BEHAVIORAL
21 HEALTH, WHO IS OUR MANAGED CARE ORGANIZATION FOR THE
22 CITY OF PHILADELPHIA. THEY ARE ACTUALLY CO-LOCATED AT,
23 DHS IN THE CENTRAL REFERRAL UNIT AT DHS. THEY WILL
24 REVIEW THE CHILD'S BEHAVIORAL HEALTH HISTORY. WE HAVE
25 DHS SCREENING SOCIAL WORKERS AT THE CENTRAL REFERRAL

1 UNIT THAT WILL GATHER THE INFORMATION FROM COMMUNITY
2 BEHAVIORAL HEALTH AS WELL AS INFORMATION ON THE REFERRAL
3 AS WELL AS INTERVIEWING THE DHS SOCIAL WORKER WITH THE
4 CUA SOCIAL WORKER TO GATHER AND ASK STRUCTURED QUESTIONS
5 SO THAT WE CAN DETERMINE THE APPROPRIATE LEVEL OF CARE
6 FOR A CHILD OR YOUTH. WHAT I MEAN BY APPROPRIATE LEVEL
7 OF CARE, CHILDREN CAN BE PLACED IN GENERAL FOSTER CARE
8 OR GENERAL KINSHIP. THAT MEANS THEY WILL BE PLACED IN A
9 FAMILY-LIKE SETTING AND THEY DON'T HAVE ANY SPECIAL
10 NEEDS. WE ALSO HAVE SPECIALIZED BEHAVIOR HEALTH FOR
11 TREATMENT IN FOSTER CARE, WHAT A YOUNG PERSON NEEDS,
12 THERAPEUTIC INTERVENTION, THEY MAY BE ON SOME TYPE OF
13 MEDICATION, OR MAYBE RECEIVING OUTPATIENT THERAPY, THEIR
14 MEDICAL FOSTER CARE BECAUSE OF MEDICAL NEEDS AND THEN WE
15 HAVE CONGREGATE CARE AS WELL.

16 Q. SO IT'S IMPORTANT TO IDENTIFY A PLACEMENT THAT
17 IS MOST APPROPRIATE FOR EACH CHILD?

18 A. YES.

19 Q. AND IS IT THE GOAL OF YOUR AGENCY TO TRY TO
20 PLACE CHILDREN IN THE LEAST RESTRICTIVE SETTING?

21 A. ABSOLUTELY.

22 Q. AFTER YOU WERE THE CHIEF IMPLEMENTATION OFFICER
23 FOR IMPROVING OUTCOMES FOR CHILDREN, WHAT POSITION DID
24 YOU HOLD?

25 A. SO OCTOBER 2016, I WAS PROMOTED TO DEPUTY

1 COMMISSIONER OF CHILD WELFARE OPERATIONS AT THE
2 DEPARTMENT, IN WHICH I WAS RESPONSIBLE FOR BOTH THE
3 DEPARTMENT HUMAN SERVICES, SO INTERNAL DIVISIONS AT THE
4 DEPARTMENT OF HUMAN SERVICES CHILD WELFARE AS WELL AS
5 THE COMMUNITY UMBRELLA AGENCY.

6 Q. AND YOUR POSITION AS DEPUTY COMMISSIONER OF
7 CHILD WELFARE OPERATIONS, THAT'S OBVIOUSLY A HIGH LEVEL
8 LEADERSHIP POSITION, CORRECT?

9 A. YES.

10 Q. AND YOU HAVE THE AUTHORITY TO MAKE DECISIONS ON
11 BEHALF OF THE AGENCY, IS THAT CORRECT?

12 A. YES.

13 Q. TURNING YOUR ATTENTION TO FOSTER CARE GENERALLY
14 IN PENNSYLVANIA, WILL YOU PLEASE EXPLAIN TO THE COURT
15 HOW MANY FOSTER CARE AGENCIES -- HOW THE FOSTER CARE
16 SYSTEM WORKS IN PENNSYLVANIA?

17 A. SO THE FOSTER CARE SYSTEM WORKS -- THE
18 PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES GIVES FOSTER
19 CARE AGENCIES THE AUTHORITY TO EITHER APPROVE,
20 DISAPPROVE OR PROVISIONALLY APPROVE FOSTER PARENTS. A
21 FOSTER PARENT WOULD CONTACT A PARTICULAR -- CONTACT THE
22 PARTICULAR AGENCY ON THEIR OWN BECAUSE THEY ARE
23 INTERESTED IN BECOMING A FOSTER PARENT. IN DOING --

24 Q. EXCUSE ME, MS. ALI, MAY I INTERRUPT YOU FOR A
25 MOMENT BECAUSE THAT IS ACTUALLY NOT WHAT I WAS INQUIRING

1 OF YOU.

2 SO STATE LAW REQUIRES HOW MANY CHILDREN
3 -- EACH AGENCY, SUCH AS DHS, IT MANDATES THAT THEY ARE
4 RESPONSIBLE FOR PROVIDING SERVICES TO CHILDREN WHO HAVE
5 BEEN ABUSED OR NEGLECTED OR WHO ARE IN NEED OF ANY
6 IN-HOME SERVICES, CORRECT?

7 A. YES.

8 Q. AND DHS DOES THAT HOW?

9 A. HOW DHS DOES THAT IS DHS WILL DO AN
10 INVESTIGATION. SO WE WILL GET A REPORT INTO OUR
11 HOTLINE, WE WILL DO AN INVESTIGATION BASED ON THE
12 ALLEGATIONS IN THE REPORT. DURING THE COURSE OF OUR
13 INVESTIGATION IF WE DETERMINE THAT A YOUNG PERSON THAT
14 THERE IS PRESENT DANGER OR ACTIVE SAFETY THREAT IN A
15 PARTICULAR HOME IN WHICH WE CANNOT MITIGATE, THEN WE
16 WOULD SEEK AN ORDER OF PROTECTIVE CUSTODY IN ORDER TO
17 REMOVE THE YOUNG PERSON FROM HIS OR HER HOME.

18 Q. NOW, AFTER THE DEPARTMENT REMOVES A CHILD FROM
19 THE HOME, HOW DOES THE DEPARTMENT GO ABOUT LOCATING AN
20 ALTERNATIVE HOME FOR THAT CHILD?

21 A. SO THE DHS INVESTIGATING SOCIAL WORKER UPON
22 REMOVAL WILL COMPLETE A REFERRAL. THAT REFERRAL GOES
23 OVER TO OUR CENTRAL REFERRAL UNIT ELECTRONICALLY AS WELL
24 AS TO OUR COMMUNITY UMBRELLA AGENCY ELECTRONICALLY.

25 Q. PRIOR TO THAT REFERRAL, IS THERE AN ATTEMPT TO

1 PLACE CHILDREN WITH A KIN?

2 A. YES. SO THEY STILL NEED A REFERRAL, SO THE
3 FIRST QUESTION THAT WE WOULD ASK OF CARE A PARENT, THE
4 CHILD IF THE CHILD IS AN APPROPRIATE AGE IS WHETHER OR
5 NOT THERE IS AN APPROPRIATE KINSHIP CARE GIVER OR WHO IS
6 IN YOUR FAMILY OR WHO DO YOU KNOW IN TERMS OF A FRIEND,
7 IS THERE A COACH, IS THERE A TEACHER IN WHICH WE CAN
8 PLACE THE YOUNG PERSON WITH SOMEONE THAT THEY KNOW
9 VERSUS PLACING THEM IN FOSTER CARE. IF THE FAMILY OR
10 THE CHILD IS ABLE TO IDENTIFY A POTENTIAL FAMILY MEMBER,
11 DHS INVESTIGATIVE SOCIAL WORKER COMPLETES EMERGENCY
12 CLEARANCES IN WHICH WE GET THE SAME DAY. THOSE
13 CLEARANCES WILL BE A CHILD ABUSE CLEARANCE TO MAKE SURE
14 THERE IS NO ABUSE OR NEGLECT. WE COMPLETE AN ONLINE
15 STATE CRIMINAL CLEARANCE TO MAKE SURE THERE ARE NO
16 CRIMINAL ACTIVITIES OR NO PROHIBITED OFFENSES THAT WILL
17 BAR THE PERSON FROM BECOMING A KINSHIP CARE GIVER. WE
18 ALSO DO A DHS HISTORY CHECK TO INSURE THAT THERE IS NO
19 ACTIVE DHS CASE OR HISTORY AGAIN THAT WOULD PROHIBIT US
20 FROM PLACING THE YOUNG PERSON WITH A PARTICULAR
21 RELATIVE. AND THEN WE COMPLETE A HOME ASSESSMENT TO
22 GATHER INFORMATION TO DETERMINE WHETHER OR NOT IT IS AN
23 APPROPRIATE PLACEMENT FOR THE CHILD.

24 AFTER THAT DETERMINATION IS MADE, AGAIN
25 THE REFERRAL IS OVER ELECTRONICALLY TO THE CENTRAL

1 REFERRAL UNIT. THE CENTRAL REFERRAL UNIT WOULD THEN
2 GATHER THE ADDITIONAL INFORMATION AND SEND THAT
3 PARTICULAR FILE TO A FOSTER CARE AGENCY.

4 Q. HOW MANY FOSTER CARE AGENCIES ARE THERE IN
5 PHILADELPHIA CURRENTLY?

6 A. 30.

7 Q. AND WHO LICENSES THE FOSTER CARE AGENCIES?

8 A. THE STATE LICENSES FOSTER CARE AGENCIES, PADHS.

9 Q. AND WILL YOU PLEASE INFORM THE COURT AS TO WHAT
10 EFFORTS ARE MADE IN TERMS OF THE GEOGRAPHIC LOCATION OF
11 WHERE CHILDREN WILL BE PLACED IN FOSTER HOMES?

12 A. IT IS OUR ATTEMPT TO PLACE YOUNG PEOPLE IN THEIR
13 COMMUNITY TO ENSURE THAT YOUNG PEOPLE MAY MAINTAIN A
14 CONNECTION TO THEIR COMMUNITY, CERTAINLY MAINTAIN THE
15 SCHOOL THAT THEY ARE ATTENDING, ANY ACTIVITIES THAT THEY
16 ARE ATTENDING, IF IT IS SAFE FOR THAT YOUNG PERSON TO
17 MAINTAIN -- BE MAINTAINED IN THEIR COMMUNITY. IF NOT,
18 BECAUSE OUR FOSTER CARE AGENCIES ARE CITY-WIDE AND THEY
19 STILL HAVE AN APPROPRIATE MATCH, ALTHOUGH IT MAY BE IN A
20 DIFFERENT SECTION OF THE CITY, THEN IT IS THE
21 RESPONSIBILITY FOR THE CUA CASE MANAGER TO ENSURE THAT
22 THE CHILD CONTINUES TO REMAIN IN THE SAME SCHOOL,
23 CONTINUE TO RECEIVE THE SAME SERVICES.

24 Q. SO WE HAVE BEEN TALKING ABOUT CUA'S AND ALSO
25 FOSTER CARE AGENCIES.

1 A. YES.

2 Q. COULD YOU PLEASE DIFFERENTIATE FOR THE COURT THE
3 DISTINCTION BETWEEN FOSTER CARE AGENCIES AND CUA
4 AGENCIES?

5 A. YES. THE CUA'S ARE COMMUNITY UMBRELLA AGENCIES.
6 AS I STATED, THE CITY IS DIVIDED INTO TEN GEOGRAPHICAL
7 NEIGHBORHOOD, IF YOU WILL. AND THE COMMUNITY UMBRELLA
8 AGENCIES -- WE ACTUALLY HAVE SIX PROVIDERS WHO ARE
9 RESPONSIBLE FOR PROVIDING THE CASE MANAGEMENT SERVICES
10 TO CHILDREN AND FAMILIES WHO ARE ACCEPTED FOR FORMAL
11 CHILD WELFARE SERVICES. SO FOR EXAMPLE, IF A FAMILY IS
12 RECEIVING IN-HOME SERVICES BECAUSE WE ARE ABLE TO
13 MAINTAIN A CHILD IN THEIR HOME, THEN THE CUA CASE
14 MANAGER IS RESPONSIBLE FOR ENSURING THE CHILD'S SAFETY
15 THROUGH WEEKLY VISITATION, IS RESPONSIBLE FOR DEVELOPING
16 A CASE PLAN FOR THE FAMILY SO THAT THE FAMILY KNOWS WHAT
17 SERVICES NEED TO BE PROVIDED SO THAT WE CAN SAFELY CLOSE
18 THEIR CASE. THE CUA CASE MANAGER IS RESPONSIBLE FOR ALL
19 ASSESSMENTS AND ALL REFERRALS OR INTERVENTIONS THAT THE
20 FAMILY NEEDS.

21 IF THE CUA CASE MANAGER -- IF A YOUNG
22 PERSON IS IN PLACEMENT, THE CUA CASE MANAGER AGAIN IS
23 RESPONSIBLE FOR ALL CASE MANAGEMENT ACTIVITIES WHICH
24 INCLUDES THE SAME THING, ASSESSMENT AND SAFETY THROUGH
25 VISITATION. THAT VISITATION IS ACTUALLY MONTHLY, CASE

1 PLANNING AND INTERVENTION THAT THE FAMILY NEEDS AS WELL.

2 Q. AND IF A CHILD HAS SPECIAL NEEDS AND HAS TO SEE
3 A THERAPIST, FOR EXAMPLE, OR HAS MULTIPLE MEDICAL
4 APPOINTMENTS TO ATTEND, WHOSE RESPONSIBILITY IS IT TO
5 ENSURE THAT THE CHILD RECEIVES THOSE SERVICES AND
6 ATTENDS THOSE APPOINTMENTS?

7 A. SO THE FOSTER CARE PARENT, BECAUSE WE WANT
8 FOSTER PARENTS TO TREAT THE CHILD LIKE IT'S THEIR CHILD,
9 IS RESPONSIBLE FOR TAKING THE CHILD TO SCHOOL, MEDICAL
10 APPOINTMENTS, BEHAVIORAL HEALTH APPOINTMENTS. HOWEVER,
11 IN THE EVENT -- BECAUSE AT TIMES FOSTER PARENTS MAY HAVE
12 MULTIPLE CHILDREN IN THEIR HOMES, IN THE EVENT THAT THEY
13 ARE UNABLE TO DO SO, IT IS THE CUA CASE MANAGER'S
14 RESPONSIBILITY.

15 Q. AND NOW WILL YOU PLEASE EXPLAIN THE ROLE OF THE
16 FOSTER CARE AGENCY?

17 A. YES. THE FOSTER CARE AGENCY IS RESPONSIBLE FOR
18 IDENTIFYING POTENTIAL FOSTER PARENTS; THEY ARE
19 RESPONSIBLE FOR RECRUITING THOSE FOSTER PARENTS; THEY
20 ARE RESPONSIBLE FOR PROVIDING TRAINING OF FOSTER PARENTS
21 AND KINSHIP CARE PARENTS, AND THEY ARE ALSO RESPONSIBLE
22 FOR THE CERTIFICATION AND MAINTAINING THE CERTIFICATION
23 OF THE FOSTER PARENTS.

24 Q. AND THE CERTIFICATION CRITERIA IS DETERMINED BY
25 THE PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES?

1 A. YES.

2 Q. AND DHS CONTRACTS WITH WHOM?

3 A. DHS CONTRACTS WITH THE FOSTER CARE PROVIDER
4 AGENCIES.

5 Q. AND THE FOSTER CARE AGENCIES CONTRACT WITH THE
6 CUA'S?

7 A. NO, DHS ALSO CONTRACTS WITH THE CUA'S. SO DHS
8 HAS CONTRACTS WITH THE COMMUNITY UMBRELLA AGENCIES AS
9 WELL AS FOSTER CARE AGENCIES.

10 MS. BARCLAY: YOUR HONOR, I WOULD OBJECT
11 TO THE LEADING QUESTIONS.

12 THE COURT: OVERRULED.

13 BY MS. OLIVER:

14 Q. AND FOR PURPOSES OF THIS LITIGATION WITH REGARD
15 TO CATHOLIC SOCIAL SERVICES, CATHOLIC SOCIAL SERVICES IS
16 A FOSTER CARE AGENCY?

17 A. YES, IT IS.

18 Q. AND CATHOLIC SOCIAL SERVICES ALSO HAS THE CUAS,
19 IS THAT CORRECT?

20 A. YES.

21 Q. SO WHO MAKES THE DETERMINATION AS TO WHETHER OR
22 NOT A CHILD IS PLACED IN A PARTICULAR HOME?

23 A. THE CENTRAL REFERRAL UNIT MAKES THE
24 DETERMINATION OF THE APPROPRIATE LEVEL OF CARE. SO
25 WHETHER OR NOT THE CHILD HAS TO BE PLACED IN FOSTER

1 CARE, GENERAL FOSTER CARE, TREATMENT FOSTER CARE. THE
2 FOSTER CARE. WE THEN -- THE CENTRAL REFERRAL UNIT THEN
3 SENDS OVER THAT REFERRAL INFORMATION TO THE FOSTER CARE
4 AGENCY AND THE FOSTER CARE AGENCY SELECTS THE FOSTER
5 PARENT AND BASED ON THE REFERRAL INFORMATION THAT CRU
6 SYNTHESISES.

7 Q. DO FOSTER PARENTS HAVE THE ABILITY TO DECIDE
8 WHICH FOSTER CARE AGENCY THEY WOULD LIKE TO WORK WITH?

9 A. YES.

10 Q. ARE THERE INSTANCES WHEREIN THE DEPARTMENT OF
11 HUMAN SERVICES HAS EVER OPPOSED A CHILD'S PLACEMENT IN A
12 PARTICULAR HOME?

13 A. YES.

14 Q. AND WILL YOU PLEASE INFORM THE COURT, FOR
15 EXAMPLE, LIKE A CIRCUMSTANCE UNDER WHICH THAT MIGHT
16 OCCUR?

17 A. YES. PRIOR TO THE CERTIFICATION OF A FOSTER
18 PARENT, THE FOSTER CARE PROVIDER AGENCY SUBMITS
19 INFORMATION TO THE DEPARTMENT OF HUMAN SERVICES BY WAY
20 OF OUR PROVIDER UNIT SO THAT WE CAN ISSUE WHAT WE CALL A
21 PROVIDER LOCATION CODE FOR THAT PARTICULAR FOSTER
22 PARENT. THAT CODE TELLS YOU WHERE THE FOSTER PARENT IS
23 LOCATED. BUT PART OF THAT CODE IS THAT WE DO
24 BACKGROUND, A DHS BACKGROUND TO DETERMINE WHETHER OR NOT
25 THE FOSTER PARENT IS KNOWN TO THE DEPARTMENT OF HUMAN

1 SERVICES, EITHER HAVE AN ACTIVE PLACEMENT OR ACTIVE CASE
2 WITH THE DEPARTMENT OF HUMAN SERVICES OR WHETHER OR NOT
3 THEY HAD A DHS HISTORY. SO THERE HAVE BEEN TIMES IN
4 WHICH FOSTER PARENTS, POTENTIAL FOSTER PARENT MAY HAVE
5 AN ACTIVE DHS CASE IN WHICH THEIR CHILD, FOR EXAMPLE, IS
6 IN PLACEMENT ON THE DELINQUENT SIDE OF THE SYSTEM. IN
7 THOSE SITUATIONS, WE WOULD NOT ISSUE A PROVIDER LOCATION
8 CODE. OR WE MAY FIND SOMETHING IN THE FOSTER PARENT
9 HISTORY, THEY MAY HAVE HAD AN EXTENSIVE HISTORY WITH THE
10 DEPARTMENT OF HUMAN SERVICES THAT COULD BE A RECENT
11 HISTORY. AGAIN, WE WOULD DENY THE ISSUANCE OF A
12 PROVIDER LOCATION CODE IN THOSE SITUATIONS.

13 Q. THANK YOU.

14 YOU TALKED ABOUT THE FACT THAT CUA CASE
15 MANAGERS HAVE CERTAIN RESPONSIBILITIES WITH REGARD TO
16 CHILDREN. WHAT IS THE CUA CHAIN OF COMMAND?

17 A. SO THE CUA CASE MANAGER REPORTS TO A CUA
18 SUPERVISOR WHO IN TURN REPORTS TO A CASE MANAGEMENT
19 DIRECTOR WHO IN TURN REPORTS TO A DIRECTOR.

20 Q. AND IS THERE AN OPERATIONS DIRECTOR FOR A CUA?

21 A. IT DEPENDS. EACH CUA HAS A DIFFERENT STRUCTURE.
22 SO SOME HAVE OPERATIONS DIRECTOR, PARTICULARLY THE ONES
23 WHO MAY MANAGE TWO COMMUNITY UMBRELLA AGENCIES, BUT FOR
24 THE MOST PART, MOST CUA'S REPORT FROM THEIR DIRECTOR TO
25 AN EXECUTIVE DIRECTOR FOR THE AGENCY.

1 Q. MS. ALI, DO YOU HAVE INFORMATION REGARDING
2 APPROXIMATELY HOW MANY CHILDREN WHO ARE IN PLACEMENT --
3 WELL, HOW MANY CHILDREN AT THIS TIME TO YOUR KNOWLEDGE
4 APPROXIMATELY ARE IN PLACEMENT THROUGH THE DEPARTMENT OF
5 HUMAN SERVICES?

6 A. 6,000 CHILDREN.

7 Q. OKAY. AND OF THOSE CHILDREN, CAN YOU INFORM THE
8 COURT ROUGHLY APPROXIMATELY HOW MUCH OF THOSE CHILDREN
9 ARE PLACED IN KINSHIP CARE?

10 A. SO ABOUT 45 PERCENT OF THE CHILDREN WHO ARE IN
11 PLACEMENT ARE IN KINSHIP CARE.

12 Q. AND ALSO WITH REGARD TO THE GEOGRAPHIC LOCATION
13 OF CHILDREN IN TERMS OF THEIR PLACEMENT, COULD YOU TELL
14 THE COURT APPROXIMATELY WHAT PERCENTAGE OF CHILDREN LIVE
15 WITHIN 5 MILES OF THEIR HOME OF ORIGIN?

16 A. APPROXIMATELY 52 PERCENT OF THE CHILDREN IN
17 PLACEMENT LIVE WITHIN 5 MILES.

18 Q. APPROXIMATELY WHAT PERCENTAGE OF CHILDREN ARE
19 PLACED WITHIN 10 MILES OF THEIR HOME OF ORIGIN?

20 A. APPROXIMATELY 76 PERCENT. AND THOSE ARE FOR
21 CHILDREN AND YOUTH WHO ARE IN FOSTER CARE OR KINSHIP
22 CARE SETTINGS.

23 Q. THANK YOU.

24 ARE THERE SITUATIONS WHEN FOSTER PARENTS
25 WORK FOR ONE AGENCY AND THEY DECIDE TO CHANGE AGENCIES?

1 A. YES.

2 Q. WILL YOU PLEASE INFORM THE COURT AS TO THAT?

3 MS. BARCLAY: OBJECTION, YOUR HONOR, AS
4 TO SPECULATION.

5 THE COURT: WELL, OVERRULED. YOU JUST
6 SAID INFORM, YOU DIDN'T SAY REASONS WHY.

7 MS. OLIVER: THANK YOU, YOUR HONOR.

8 BY MS. OLIVER:

9 Q. WILL YOU PLEASE PROVIDE THE COURT WITH REASONS
10 AS TO WHY SOME FOSTER PARENTS CHANGE AGENCIES?

11 MS. BARCLAY: OBJECTION, YOUR HONOR, FOR
12 SPEAKING ABOUT INFORMING AND THAT IS HEARSAY OF THIRD
13 PARTIES.

14 BY MS. OLIVER:

15 Q. TO YOUR KNOWLEDGE AS THE DEPUTY --

16 THE COURT: OVERRULED.

17 MS. OLIVER: THANK YOU.

18 THE WITNESS: CAN YOU REPEAT THE
19 QUESTION?

20 BY MS. OLIVER:

21 Q. WHY DO SOME FOSTER PARENTS CHANGE AGENCIES?

22 A. TO MY KNOWLEDGE AND IN MY EXPERTISE, THE REASON
23 WHY FOSTER PARENTS CHANGE AGENCIES IS SOMETIMES THERE
24 MAY BE DISSATISFACTION WITH A PARTICULAR FOSTER CARE
25 AGENCY. OTHER TIMES THEY MAY HAVE A YOUNG PERSON IN

1 THEIR HOME WHO IS IN NEED OF SPECIALIZED SERVICES, SUCH
2 AS SPECIALIZED BEHAVIORAL HEALTH, BECAUSE THEY HAVE A
3 BEHAVIORAL HEALTH NEED THAT EXCEEDS THE EXPERTISE OF
4 PARTICULAR FOSTER CARE AGENCIES. IN EITHER SITUATION,
5 WE TRY TO OBTAIN OR WE DO OBTAIN AT THE DEPARTMENT A
6 REASON WHY THE FOSTER PARENT WANTS TO TRANSFER. IF IT
7 IS DISSATISFACTION FOR OUR FOSTER CARE AGENCY, THEN WE
8 TRY TO RESOLVE THOSE DIFFERENCES BETWEEN THE FOSTER
9 PARENT AS WELL AS THE AGENCY. IF IT IS BECAUSE A YOUNG
10 PERSON NEEDS A HIGHER LEVEL OF CARE, WE ASK THE FOSTER
11 PARENT IF THEY ARE WILLING TO CONTINUE TO CARE FOR THE
12 YOUNG PERSON. IF THEY ARE WILLING TO CARE FOR THE YOUNG
13 PERSON, THEN AS OPPOSED TO ALLOWING THE YOUNG PERSON TO
14 DISRUPT FROM THE FOSTER HOME IN WHICH WE WOULD HAVE TO
15 REMOVE THE CHILD FROM THE FOSTER HOME, WE TRANSFER THAT
16 ENTIRE FOSTER HOME TO A DIFFERENT PROVIDER AGENCY.

17 Q. SO IN OTHER WORDS, IS IT YOUR TESTIMONY THAT IF
18 A FOSTER PARENT CHANGES AGENCIES, THAT DOES NOT
19 NECESSITATE THE DISRUPTION IN THAT CHILD'S PLACEMENT?

20 A. ABSOLUTELY. THE FIRST THING WE ASK FOSTER
21 PARENTS WHO HAVE CHILDREN IN THEIR HOME IS WHETHER OR
22 NOT THEY WILL BE WILLING TO CONTINUE TO FOSTER THAT
23 CHILD OR YOUTH BECAUSE WE WANT TO MINIMIZE AND AVOID
24 DISRUPTIONS.

25 Q. AND IF WE CAN GO BACK FOR JUST A MOMENT BECAUSE

1 YOU TALKED A BIT ABOUT FOSTER HOME PLACEMENT, FOSTER
2 CARE HOME PLACEMENTS. CAN YOU TALK A LITTLE BIT ABOUT
3 THE OTHER TYPES OF PLACEMENTS SUCH AS CONGREGATE CARE,
4 GROUP HOMES AND MEDICAL TREATMENT FACILITIES?

5 A. YES. SO CONGREGATE CARE IS THE BROADER TERM
6 WHEN WE TALK ABOUT NONFAMILY-LIKE SETTINGS. SO THEY
7 CONSIST OF GROUP HOMES IN WHICH GROUP HOMES ARE LOCATED
8 WITHIN THE COMMUNITY. THEY ARE IN VARIOUS SECTIONS OF
9 THE CITY AND OUTSIDE THE CITY. THE YOUNG PERSON TENDS
10 TO -- TYPICALLY WILL ATTEND A SCHOOL THAT IS IN THEIR
11 PARTICULAR COMMUNITY. WE ALSO HAVE CHILD WELFARE
12 PLACEMENT THAT I CALL INSTITUTIONAL PLACEMENTS. THOSE
13 PLACEMENTS ARE CAMPUS-LIKE PLACEMENTS IN WHICH THE YOUNG
14 PERSON LIVES ON THE CAMPUS AND THE SCHOOL IS PRIMARILY
15 AN ON-GROUNDS SCHOOL IN WHICH IT IS RUN BY THE
16 PARTICULAR PLACEMENT AGENCY. AND THEN THERE ARE
17 RESIDENTIAL TREATMENT FACILITIES. THESE ARE FACILITIES
18 IN WHICH A YOUNG PERSON HAS A PSYCHIATRIC EVALUATION
19 THAT INDICATES THAT THERE IS A MEDICAL NECESSITY BECAUSE
20 THAT YOUNG PERSON NEEDS A LEVEL OF TREATMENT. THE RTFS
21 ARE CONTRACTED BY COMMUNITY BEHAVIORAL HEALTH, WHICH IS
22 A MANAGED CARE ORGANIZATION, AND DHS ALSO HOLDS A SMALL
23 CONTRACT WITH THE RESIDENTIAL TREATMENT FACILITIES IF
24 THE YOUNG PERSON IS COMMITTED TO THE DEPARTMENT TO
25 PROVIDE A PERSONAL ONE-ON-ONE FOR THE CHILD OR YOUTH.

1 Q. SO AN ASSESSMENT IS DONE WHICH DETERMINES THE
2 TYPE OF PLACEMENT THAT WOULD BE BEST SUITED TO A
3 PARTICULAR CHILD?

4 A. YES.

5 Q. AND WILL YOU TALK ABOUT RESPITE CARE, PLEASE?

6 A. YES. RESPITE CARE -- SO RFPA'S ARE LICENSED
7 FOSTER PARENTS WHO ARE WILLING TO PROVIDE TEMPORARY CARE
8 FOR A CHILD OR A YOUTH. RESPITE PROVIDERS TYPICALLY
9 WANT TO DO SHORT-TERM AS OPPOSED TO LONG-TERM PLACEMENTS
10 FOR CHILDREN AND YOUTH.

11 Q. AND WHY MIGHT RESPITE CARE BE USED?

12 A. RESPITE CARE IS USED FOR A NUMBER OF REASONS.
13 WHEN YOUNG PEOPLE HAVE HIGHER LEVEL OF NEED SUCH AS
14 BEHAVIORAL HEALTH NEEDS OR MEDICAL NEEDS, A FOSTER
15 PARENT MAY NEED A BREAK, IF YOU WILL. SO THAT CHILD OR
16 YOUTH WILL BE PLACED IN RESPITE CARE, OR YOU COULD USE
17 RESPITE CARE IF A FOSTER PARENT IS GOING OUT OF TOWN,
18 FOR EXAMPLE, FOR THE WEEKEND. AND THEN THE CHILD AGAIN
19 IS PLACED TEMPORARY IN RESPITE.

20 Q. ONCE A CHILD IS PLACED IN CARE, DOES DHS HAVE
21 THE AUTHORITY TO MOVE THAT CHILD TO A DIFFERENT HOME?

22 A. DHS HAS TO SEEK APPROVAL FROM THE COURT IN ORDER
23 TO MOVE A CHILD FROM A PLACEMENT. AND IF IT'S AN
24 EMERGENCY SITUATION, THEN DHS CAN MOVE THE CHILD
25 IMMEDIATELY. BUT AGAIN, WE HAVE TO SEEK COURT APPROVAL

1 ON THE BACK END. IF IT IS A NONEMERGENCY SITUATION,
2 THEN WE HAVE TO GET COURT APPROVAL BEFORE THE MOVE IS TO
3 TAKE PLACE.

4 Q. THANK YOU.

5 MS. OLIVER: THE COURT'S INDULGENCE,
6 PLEASE.

7 (BRIEF PAUSE IN THE PROCEEDING.)

8 MS. OLIVER: THANK YOU, YOUR HONOR.

9 BY MS. OLIVER:

10 Q. MS. ALI, GENERALLY DO CUA'S MAKE THE FIRST -- DO
11 FOSTER CARE AGENCIES AND CUA'S MAKE REFERRALS TO OTHER
12 AGENCIES?

13 A. NO, ALL REFERRALS COME THROUGH THE CENTRAL
14 REFERRAL UNIT AT DHS. WE CENTRALIZED THAT PROCESS BACK
15 IN JULY OF 2017. THE ONLY TIME A FOSTER CARE AGENCY CAN
16 MAKE REFERRALS IS IF THEY ARE REFERRING INTERNALLY TO
17 THEIR PROGRAM. SO FOR EXAMPLE, NET -- IF A YOUNG PERSON
18 IS IN FOSTER HOME THROUGH NORTHEAST TREATMENT, THE
19 FOSTER -- THE CHILD IS DISRUPTIVE OR NEEDS TO MOVE FROM
20 THEIR FOSTER CARE AGENCY, THEN NORTHEAST TREATMENT OR
21 NET WILL LOOK WITHIN THEIR OWN CONTINUUM FOR THE
22 REFERRALS TO OCCUR.

23 Q. NOW, YOU HEARD TESTIMONY TODAY THAT THE
24 DEPARTMENT OF HUMAN SERVICES HAS CLOSED INTAKE WITH
25 CATHOLIC SOCIAL SERVICES, CORRECT?

1 A. YES.

2 Q. AND TO YOUR KNOWLEDGE, WHO MADE THAT DECISION?

3 A. COMMISSIONER CYNTHIA FIGUEROA.

4 Q. HAVE THERE BEEN OTHER OCCASIONS IN THE PAST WHEN
5 THE DEPARTMENT OF HUMAN SERVICES HAS CLOSED INTAKE AT
6 OTHER AGENCIES?

7 A. YES.

8 Q. AND WHEN THAT HAS HAPPENED, COULD YOU PLEASE
9 DESCRIBE THAT PROCESS TO THE COURT AND WHAT HAS HAPPENED
10 TO CHILDREN WHEN INTAKE HAS BEEN CLOSED AT AGENCIES?

11 A. SO WHEN INTAKE IS CLOSED AT AGENCIES, THE
12 CENTRAL REFERRAL UNIT WILL NO LONGER SEND NEW REFERRALS
13 TO A PARTICULAR AGENCY. HOWEVER, WHEN A CHILD OR A
14 YOUTH IS KNOWN TO A PARTICULAR AGENCY, OR IF THEY HAVE
15 SIBLINGS WITH A PARTICULAR AGENCY, THEN HIGHER LEVEL
16 LEADERSHIP AT DHS WILL GRANT EXCEPTIONS.

17 Q. AND TO YOUR KNOWLEDGE, IN LIGHT OF THE CURRENT
18 STOPPAGE OF REFERRALS TO CATHOLIC SOCIAL SERVICES, HAVE
19 THERE BEEN ANY EXCEPTIONS TO THAT?

20 A. YES.

21 Q. AND WHO MAKES THE DETERMINATION AS TO WHETHER
22 EXCEPTIONS SHOULD BE GRANTED?

23 A. I DO.

24 Q. AND WHO MAKES THE REQUESTS FOR THOSE EXCEPTIONS?

25 A. HIGHER LEVEL LEADERSHIP AT THE PARTICULAR

1 AGENCY. IF YOU TALK ABOUT -- IN THIS PARTICULAR CASE IT
2 WOULD HAVE BEEN JIM AMATO FROM CATHOLIC SOCIAL SERVICES
3 OR JIM BLACK FROM CATHOLIC SOCIAL SERVICES.

4 Q. AND WHEN INTAKE IS CLOSED AT A PARTICULAR
5 AGENCY, WHAT HAPPENS TO THE CHILDREN WHO ARE ALREADY
6 PLACED WITH THOSE AGENCIES?

7 A. THEY REMAIN WITH THE AGENCY.

8 MS. OLIVER: THANK YOU. I HAVE NO
9 FURTHER QUESTIONS.

10 THE COURT: CROSS-EXAMINE.

11 MS. BARCLAY: MAY I CROSS THIS WITNESS,
12 YOUR HONOR?

13 THE COURT: YES.

14 MS. BARCLAY: MAY I HAVE PERMISSION TO
15 MOVE THIS CHAIR JUST TO PUT MY BINDER ON IT?

16 THE COURT: OKAY.

17 CROSS-EXAMINATION

18 BY MS. BARCLAY:

19 Q. GOOD AFTERNOON, MS. ALI.

20 A. GOOD AFTERNOON.

21 Q. YOU ENCOURAGE PROSPECTIVE FOSTER FAMILIES TO
22 FIND A FOSTER AGENCY IN PHILADELPHIA THAT WOULD BE THE
23 BEST FIT FOR THAT PARTICULAR FAMILY?

24 A. YES.

25 Q. YOU WANT FAMILIES TO FEEL CONFIDENT AND

1 COMFORTABLE ABOUT THE AGENCIES THEY CHOOSE?

2 A. YES.

3 Q. YOU TESTIFIED THAT PARENTS HAVE THE ABILITY TO
4 DECIDE WHICH AGENCY TO WORK WITH?

5 A. YES.

6 Q. THESE AGENCIES WILL BE A BIG SUPPORT TO THE
7 FOSTER PARENT DURING THEIR PARENTAL JOURNEY, WON'T THEY?

8 A. YES.

9 Q. THE DHS WORKS WITH A RANGE OF FOSTER CARE
10 AGENCIES WITH DIFFERENT SPECIALTIES, RIGHT?

11 A. YES.

12 Q. THE MAYOR'S OFFICE HAS AN OFFICE OF LGBTQ
13 AFFAIRS, CORRECT?

14 A. YES.

15 Q. THAT OFFICE DOES NOT PROVIDE SERVICES TO PEOPLE
16 WHO DO NOT IDENTIFY AS LGBTQ, CORRECT?

17 MS. OLIVER: OBJECTION.

18 THE COURT: I DON'T KNOW THAT SHE WOULD
19 KNOW THAT.

20 THE WITNESS: I WAS GOING TO SAY I DON'T
21 KNOW.

22 BY MS. BARCLAY:

23 Q. FAIR ENOUGH.

24 THAT OFFICE HAS PARTNERED WITH OTHER
25 FOSTER AGENCIES LIKE SECOND CHANCE AND PHILADELPHIA

1 FAMILY PRIDE FOR LGBTQ RECRUITING EVENTS, CORRECT?

2 MS. OLIVER: OBJECTION.

3 THE COURT: IF YOU KNOW.

4 THE WITNESS: I'M NOT SURE.

5 MS. BARCLAY: WITH INDULGENCE, YOUR
6 HONOR.

7 THE COURT: YES.

8 (BRIEF PAUSE IN THE PROCEEDING.)

9 MS. BARCLAY: PERMISSION TO APPROACH THE
10 WITNESS, YOUR HONOR?

11 THE COURT: YES.

12 BY MS. BARCLAY:

13 Q. MS. ALI, I HAVE HANDED YOU A DOCUMENT ENTITLED
14 FOSTER PARENT RECRUITMENT. THIS IS ON THE PHILADELPHIA
15 FAMILY PRIDE WEBSITE. DOES THAT LOOK CORRECT TO YOU?

16 A. YES.

17 Q. THE DOCUMENT SAYS THAT PHILADELPHIA FAMILY PRIDE
18 HAS PARTNERED WITH THE MAYOR'S OFFICE WITH LGBTQ
19 AFFAIRS?

20 MS. OLIVER: OBJECTION.

21 MS. BARCLAY: I AM NOT SURE WHAT THE
22 OBJECTION IS, YOUR HONOR.

23 MS. OLIVER: YOUR HONOR, THIS DOCUMENT IS
24 NOT A DOCUMENT, THAT PAGE, THAT WAS ISSUED BY THE
25 DEPARTMENT OF HUMAN SERVICES, IT'S A DOCUMENT FROM

1 PHILADELPHIA FAMILY PRIDE.

2 MS. BARCLAY: YOUR HONOR, I AM JUST
3 ASKING HER A QUESTION ABOUT IT, NUMBER ONE, AND NUMBER
4 TWO, THE RULES OF EVIDENCE DON'T APPLY AT A PRELIMINARY
5 INJUNCTION HEARING.

6 THE COURT: WELL, IT SPEAKS FOR ITSELF.
7 OVERRULED.

8 BY MS. BARCLAY:

9 Q. MS. ALI, IT SAYS THAT PHILLY FAMILY PRIDE HAS
10 PARTNERED WITH THE MAYOR'S OFFICE OF LGBTQ AFFAIRS, A
11 SECOND CHANCE AND DHS RECRUIT LGBTQ ADULTS, SINGLE OR
12 PARTNERED, IN THE PHILADELPHIA AREA TO BECOME FOSTER
13 PARENTS, SPECIFICALLY FOR LGBTQ YOUTHS IN THE SYSTEM.
14 DID I READ THAT CORRECTLY?

15 A. YES.

16 Q. DOES THIS REFRESH YOUR RECOLLECTION ABOUT ANY
17 RECRUITING THAT IS GOING ON BY AGENCIES FOR LGBTQ
18 POPULATION?

19 A. IT ACTUALLY REFRESHES MY RECOLLECTION ABOUT THE
20 FOSTER CARE RECRUITMENT THAT THE DEPARTMENT OF HUMAN
21 SERVICES DID IN MARCH IN WHICH WE HAD A RECRUITMENT
22 STRATEGY AND WE DID A PHONE BANK IN WHICH WE WANTED
23 LGBTQ INDIVIDUALS WHO ARE INTERESTED IN PROVIDING THAT
24 LEVEL OF CARE TO YOUNG PEOPLE. SO WE ACTUALLY TARGETED
25 -- THE PHILADELPHIA DEPARTMENT OF HUMAN SERVICES

1 ACTUALLY TARGETED EVERYONE IN ALL FOSTER CARE AGENCIES
2 AND NOT JUST ONE FOSTER CARE AGENCY IN PARTICULAR.

3 Q. SO DHS WAS ENCOURAGING RECRUITMENT OF POPULATION
4 FOR PARENTS TO CARE FOR LGBTQ YOUTHS, RIGHT?

5 A. YES.

6 Q. AND THAT'S A PRIORITY FOR DHS?

7 A. ONE OF MANY, YES.

8 Q. ONE OF THE POINTS OF THESE TARGETED RECRUITING
9 SESSIONS WAS ALSO TO FIND LGBTQ FOSTER PARENTS TO CARE
10 FOR LGBTQ YOUTHS, CORRECT?

11 A. LGBTQ AFFIRMING FOSTER PARENTS. SO THE FOSTER
12 PARENTS IN AND OF THEMSELVES DID NOT HAVE TO BE LGBTQ.

13 Q. SURE. BUT THERE WAS ALSO AN EFFORT TO RECRUIT
14 LGBTQ PARENTS NOW THAT THEY WERE A PRIORITY AS WELL,
15 CORRECT?

16 A. YES.

17 Q. AND AS YOU SAID, TO FIND PARENTS WHO WOULD BE
18 SUPPORTIVE AND AFFIRMING OF A LGBTQ FOSTER CHILD?

19 A. YES.

20 Q. IF A FAMILY WENT TO ANOTHER AGENCY LOOKING FOR A
21 PARTICULAR EXPERTISE WITH SUPPORTING LGBTQ POPULATION,
22 IT WOULD BE APPROPRIATE FOR THAT AGENCY TO SEND THAT
23 COUPLE TO SECOND CHANCE, FOR EXAMPLE, IF THEY WANTED
24 PARTICULAR EXPERTISE?

25 A. I WOULD NOT BE ABLE TO ANSWER THAT QUESTION.

1 Q. YOU WERE TRYING TO ENSURE THROUGH THESE PROGRAMS
2 THAT LGBTQ POPULATIONS WOULD BE ABLE TO FIND A FOSTER
3 AGENCY THAT IS A GOOD FIT FOR THEM AND THEY CAN BE
4 CONFIDENT IN, RIGHT?

5 A. YES.

6 Q. IF LGBTQ POPULATIONS WERE NOT ABLE TO WORK WITH
7 AN AGENCY THAT WAS A GOOD FIT OR THAT WAS AFFIRMING OF
8 THEM, THOSE LGBTQ FAMILIES WOULD BE HARMED, RIGHT?

9 A. CAN YOU REPEAT YOUR QUESTION?

10 Q. IF LGBTQ FAMILIES WERE NOT ABLE TO WORK WITH AN
11 AGENCY THAT WAS AFFIRMING OF THEM, THOSE LGBTQ FAMILIES
12 WOULD BE HARMED, RIGHT?

13 A. YES.

14 Q. SO IT WAS IMPORTANT FOR THEM TO BE ABLE TO FIND
15 AN AGENCY THAT IS A GOOD FIT?

16 A. YES.

17 Q. AND PREVENTING FAMILIES FROM WORKING WITH AN
18 AGENCY THAT THEY THINK IS THE BEST FIT WOULD CAUSE THEM
19 HARM, RIGHT?

20 A. ALL OF OUR AGENCIES -- THE REASON WHY WE DID A
21 LGBTQ RECRUITMENT STRATEGY IS BECAUSE WE HAVE A NUMBER
22 OF YOUNG PEOPLE WHO ARE LGBTQ.

23 Q. I UNDERSTAND, THAT'S NOT THE QUESTION I AM
24 ASKING, MS. ALI.

25 A. WHAT IS THE QUESTION?

1 Q. IF A FAMILY WAS PREVENTED FROM AN AGENCY THAT
2 THEY BELIEVE WOULD BE THE BEST FIT FOR THEM, WOULD THAT
3 CAUSE A HARM FOR THE FAMILY?

4 MS. OLIVER: OBJECTION, YOUR HONOR.

5 THE COURT: SUSTAINED.

6 MS. OLIVER: JUST CUT IT DOWN, THE
7 QUESTION AS TO WHAT WOULD BE HARMFUL TO THE FAMILY.

8 BY MS. BARCLAY:

9 Q. YOU HEARD FROM MRS. PAUL AND AND MS. FULTON AND
10 MS. SIMMS-BUSCH OFFER TESTIMONY TODAY?

11 A. I DID.

12 Q. ALL OF THOSE INDIVIDUALS TALKED ABOUT HOW
13 CATHOLIC SOCIAL SERVICES IS A GOOD FIT FOR THEM, RIGHT?

14 A. YES.

15 Q. DO YOU THINK IT'S IMPORTANT FOR FAMILIES TO BE
16 ABLE TO FEEL CONFIDENT AND CONFIDENT WITH THE OPTION
17 THEY CHOOSE?

18 A. YES.

19 Q. AND YOU FEEL IT'S ALSO IMPORTANT FOR THOSE
20 FAMILY TO FEEL SUPPORTED AND CONFIDENT IN THEIR
21 DECISION?

22 A. YES. AND, IN TURN, I THINK FOSTER CARE PROVIDER
23 AGENCIES SHOULD MAKE THEM FEEL THAT WAY.

24 Q. YOU KNOW MS. PAUL FROM YOUR WORK AT DHS, RIGHT?

25 A. I DO NOT KNOW MS. PAUL PERSONALLY OR FROM MY

1 PROFESSIONAL WORK AT DHS.

2 Q. WE HAVE DISCUSSED HOW FAMILIES NEED TO BE ABLE
3 TO FIND AN AGENCY THAT IS A GOOD FIT FOR THEM, BUT
4 AGENCIES ALSO NEED TO EVALUATE PROSPECTIVE FAMILIES FOR
5 FOSTER CARE, CORRECT?

6 A. YES.

7 Q. THERE ARE LIMITS ON WHO CAN BECOME A FOSTER
8 PARENT?

9 A. YES. BASED ON THE 3700 REGULATIONS.

10 Q. YOU ALSO SAID THAT YOU MIGHT DENY A FAMILY BASED
11 ON THEIR HISTORY WITH DHS THAT COMES TO YOU BEFORE
12 CERTIFICATION, CORRECT?

13 A. WE DENY THE ISSUANCE OF A PROVIDER LOCATION
14 CODE, NOT DENYING FOSTER PARENTS.

15 Q. THE PROVIDER LOCATION CODE FOR THE AGENCY?

16 A. THE PROVIDER LOCATION CODE FOR THE AGENCY, AND
17 IT SPEAKS FOR THE AGENCY AS WELL AS THE PARTICULAR
18 FOSTER HOME.

19 Q. SO IF YOU DENIED THE LOCATION CODE, WOULD THAT
20 FAMILY BE ABLE TO BE A FOSTER PARENT THROUGH THAT
21 AGENCY?

22 A. YES. THROUGH ANOTHER COUNTY.

23 Q. IN ANOTHER COUNTY?

24 A. YES.

25 Q. BUT NOT IN PHILADELPHIA?

1 A. YES.

2 Q. SO YOU'RE -- YOU HAVE DENIED THE ABILITY OF
3 FAMILIES TO BE A FOSTER PARENT IN PHILADELPHIA BASED ON
4 THEIR HISTORY WITH DHS?

5 A. I HAVE DENIED THE ISSUANCE OF A PROVIDER
6 LOCATION CODE.

7 Q. WHICH HAS THE IMPACT OF PREVENTING THEM FROM
8 BEING A FOSTER PARENT IN PHILADELPHIA, AS YOU JUST SAID?

9 A. YES.

10 Q. YOU ARE AWARE THAT STATE LAW ACTUALLY REQUIRES
11 AGENCIES TO CONSIDER THE ABILITY OF THE APPLICANTS TO
12 WORK IN PARTNERSHIP WITH THE FOSTER AGENCY, CORRECT?

13 A. YES.

14 Q. AND YOU SAID THAT THE STATE ACTUALLY LICENSES
15 FOSTER AGENCIES.

16 A. YES.

17 Q. AND THAT REQUIREMENT I JUST QUOTED YOU, THAT'S
18 STATE LAW, CORRECT?

19 A. YES.

20 Q. AND DHS'S CONTRACT REQUIRES CATHOLIC TO COMPLY
21 WITH STATE LAW.

22 A. YES.

23 Q. THE DHS CONTRACT ALSO HAS A LIST OF CRIMINAL
24 CONVICTIONS THAT WOULD PREVENT AN INDIVIDUAL FROM
25 BECOMING A FOSTER PARENT.

1 A. YES.

2 Q. WHEN A FOSTER AGENCY IS CONSIDERING CERTIFYING A
3 FAMILY FOR FOSTER -- TO FOSTER CHILDREN, STATE LAW
4 REQUIRES THAT THE AGENCY CONSIDER ADDITIONAL FACTORS,
5 AND I WANT TO LOOK AT YOU WITH WHAT SOME OF THOSE
6 FACTORS ARE.

7 THE AGENCY IS REQUIRED TO CONSIDER THE
8 ABILITY TO PROVIDE CARE, NURTURING, AND SUPERVISION TO
9 CHILDREN.

10 A. YES.

11 Q. THE AGENCY HAS CONSIDERED THERE IS A
12 DEMONSTRATED STABLE, MENTAL, AND EMOTIONAL ADJUSTMENT.

13 A. OF THE PARENT.

14 Q. OF THE PROJECTED FOSTER FAMILY.

15 A. YES. YES.

16 Q. AND THAT MIGHT EVEN REQUIRE A PSYCHOLOGICAL
17 EVALUATION, CORRECT?

18 A. YES.

19 Q. WHETHER THE FAMILY HAS SUPPORTIVE COMMUNITY TIES
20 IS ANOTHER FACTOR TO CONSIDER.

21 A. YES.

22 Q. THE AGENCY HAS TO CONSIDER FAMILIAL
23 RELATIONSHIPS, ATTITUDES, AND EXPECTATIONS, ESPECIALLY
24 THAT MIGHT AFFECT THE FOSTER CHILD.

25 A. YES.

1 Q. THEY HAVE TO CONSIDER THE FAMILY'S ABILITY TO
2 ACCEPT THE CHILD'S RELATIONSHIP WITH HIS OWN PARENTS.

3 A. YES.

4 Q. THEY HAVE TO CONSIDER THE NUMBER AND
5 CHARACTERISTICS OF CHILDREN BEST SUITED TO THE FOSTER
6 FAMILY.

7 A. YES.

8 Q. AND THIS LAW REQUIRES AGENCIES TO CONSIDER THE
9 ABILITY OF THE APPLICANT TO WORK IN PARTNERSHIP WITH THE
10 FOSTER AGENCY.

11 A. YES.

12 Q. THIS INVOLVED A CONSIDERATION OF WHICH FAMILIES
13 WOULD BE A GOOD FIT WITH THE AGENCIES.

14 A. I AM NOT SURE EXACTLY WHAT YOU ARE SAYING TO --
15 IN TERMS OF GOOD FIT.

16 Q. THERE'S NOTHING IN STATE LAW THAT SAYS THAT
17 AGENCIES MUST CERTIFY THE APPLICANT AFTER CONSIDERING
18 THESE FACTORS, IS THERE?

19 A. I AM NOT SURE.

20 Q. YOU ARE NOT AWARE OF ANYTHING IN STATE LAW THAT
21 SETS FORTH THAT REQUIREMENT, ARE YOU?

22 MS. OLIVER: OBJECTION.

23 THE COURT: SHE SAID SHE IS NOT SURE.

24 THE WITNESS: I AM NOT SURE.

25 MS. BARCLAY: JUST A MOMENT, YOUR HONOR.

1 BY MS. BARCLAY:

2 Q. DHS'S CONTRACT WITH CATHOLIC IS NOT JUST LIMITED
3 TO FOSTER CARE SERVICES, CORRECT?

4 A. CORRECT.

5 Q. IT ALSO INVOLVES SERVICES FOR ADJUDICATED
6 DELINQUENTS, ADJUDICATED DEPENDENT TEENS, AND
7 REINTEGRATION SERVICES THAT COME FROM THE CENTRAL
8 REFERRAL UNIT, CORRECT?

9 A. ONLY THE DEPENDENT SERVICES COME FROM THE
10 CENTRAL REFERRAL UNIT.

11 Q. AND THE CONTRACT WITH CATHOLIC SOCIAL SERVICES
12 INVOLVES SERVICES FOR THOSE DEPENDENT TEEN BOYS AND
13 GIRLS, CORRECT?

14 A. YES.

15 Q. AND THE CONTRACT ALSO INVOLVES SERVICES FOR
16 ADJUDICATED DELINQUENTS.

17 A. YES.

18 Q. AND THE CONTRACT INVOLVES REINTEGRATION
19 SERVICES.

20 A. YES.

21 Q. THIS CONTRACT HAS A PROVISION ABOUT THE CITY'S
22 PUBLIC ACCOMMODATION ORDINANCE.

23 A. YES.

24 Q. PUBLIC ACCOMMODATIONS IN PHILADELPHIA SHOULD
25 ACCEPT ALL COMERS, RIGHT?

1 A. I DON'T KNOW THE SPECIFICS.

2 Q. CATHOLIC'S HAS BEEN PARTNERING WITH THE
3 GOVERNMENT TO PROVIDE FOSTER CARE SERVICES FOR YEARS,
4 RIGHT?

5 A. YES.

6 Q. THE DHS CONTRACT SPECIFICALLY OBSERVES THAT
7 CATHOLIC IS AN ORGANIZATION WITH A RELIGIOUS MISSION.

8 MS. OLIVER: OBJECTION, YOUR HONOR. THE
9 QUESTIONS SPECIFICALLY WITH REGARD TO THE DHS CONTRACT,
10 THE CONTRACT WAS ENTERED AS AN EXHIBIT IN THESE
11 PROCEEDINGS. AND I BELIEVE THE COURT CAN CERTAINLY
12 REVIEW THE CONTRACT IF THE COURT DEEMS IT NECESSARY AND
13 APPROPRIATE.

14 MS. BARCLAY: MAY I HAVE PERMISSION TO
15 APPROACH THE WITNESS WITH THE CONTRACT, YOUR HONOR?

16 THE COURT: YES.

17 MS. OLIVER: YOUR HONOR, AT THIS TIME,
18 BEFORE THIS DOCUMENT IS SHOWN TO THE WITNESS, IF WE CAN
19 PLEASE TAKE A LOOK AT THE DOCUMENT.

20 THE COURT: YES.

21 BY MS. BARCLAY:

22 Q. MS. ALI, IF YOU CAN TURN YOUR ATTENTION TO THE
23 BOTTOM OF PAGE 27. THIS IS ECF 13-3.

24 MS. OLIVER: OBJECTION, YOUR HONOR. I AM
25 OBJECTING AT THIS TIME TO THIS WITNESS BEING QUESTIONED

1 REGARDING THE CONTRACT, AS THE CONTRACT SPEAKS FOR
2 ITSELF AND THIS WITNESS IS NOT AN ATTORNEY.

3 MS. BARCLAY: IF THE CONTRACT SPEAKS FOR
4 ITSELF, YOUR HONOR, THERE SHOULD NOT BE A PROBLEM
5 BRIEFLY DISCUSSING THAT.

6 MS. OLIVER: YOUR HONOR, SHE IS ALSO NOT
7 THE PERSON WHO NEGOTIATED THE CONTRACT AND WOULD NOT
8 HAVE KNOWLEDGE SPECIFICALLY AS TO THE TERMS OF THE
9 CONTRACT. I SUBMIT TO THE COURT THAT ON
10 CROSS-EXAMINATION THAT HER TESTIMONY -- HER QUESTIONS
11 SHOULD BE LIMITED TO QUESTIONS ABOUT DHS'S POLICY,
12 PRACTICES OR PROCEDURES, AND SPECIFICALLY NOT QUESTIONS
13 WITH REGARD TO THE CONTRACT ABOUT WHICH SHE DOES NOT
14 HAVE KNOWLEDGE.

15 MS. BARCLAY: THE RELIGIOUS NATURE OF THE
16 AGENCY, YOUR HONOR, IS RELEVANT TO QUESTIONS ABOUT FIT
17 WITH FAMILIES AND THE POPULATION THAT THE AGENCY
18 REACHES. AND SO WE ARE BRINGING THE WITNESS'S ATTENTION
19 TO THAT FOR THE CROSS-EXAMINATION PURPOSES.

20 THE COURT: FOR THAT LIMITED PURPOSE, I
21 WILL PERMIT IT.

22 BY MS. BARCLAY:

23 Q. MS. ALI, IF I COULD TURN YOUR ATTENTION TO THE
24 BOTTOM OF PAGE 27 OF DOCUMENT ECF 13-3. THIS SAYS
25 THAT --

1 MS. OLIVER: MAY I HAVE A MOMENT, PLEASE?

2 THE COURT: YES.

3 (BRIEF PAUSE IN THE PROCEEDING.)

4 MS. OLIVER: COULD YOU PLEASE AGAIN STATE
5 WHAT YOU ARE REFERRING HER TO?

6 BY MS. BARCLAY:

7 Q. MS. ALI, IF I COULD TURN YOUR ATTENTION TO THE
8 BOTTOM OF PAGE 27 OF DOCUMENT ECF 13-3. THIS SAYS:
9 PROVIDER ORGANIZATIONAL OVERVIEW. THE MISSION
10 STATEMENT. CATHOLIC SOCIAL SERVICES OF THE ARCHDIOCESE
11 OF PHILADELPHIA CONTINUES TO WORK -- THE WORK OF JESUS
12 BY AFFIRMING, ASSISTING, AND ADVOCATING FOR INDIVIDUALS,
13 FAMILIES, AND COMMUNITIES. THE VISION AND VALUE
14 STATEMENT OF CATHOLIC SOCIAL SERVICES.

15 THEN IT GOES ON TO TALK ABOUT THE WAYS
16 THAT -- IF YOU TURN TO THE NEXT PAGE -- CATHOLIC SOCIAL
17 SERVICES EXISTS TO TRANSFORM LIVES AND TO BRING ABOUT A
18 JUST AND COMPASSIONATE SOCIETY WHERE EVERY INDIVIDUAL IS
19 VALUED, FAMILIES ARE HEALTHY AND STRONG, AND COMMUNITIES
20 ARE UNITED IN THEIR COMMITMENT TO THE GOOD OF ALL. WE
21 ENVISION A WORLD TOUCHED BY GOD'S MERCY WHERE POVERTY
22 AND NEED ARE ALLEVIATED AND THE PEOPLE SHARE JUSTLY THE
23 BLESSINGS OF CREATION.

24 AND THEN IF I COULD TURN YOUR ATTENTION,
25 MS. ALI -- DID I READ THAT CORRECTLY?

1 A. YES.

2 Q. IF I COULD TURN YOUR ATTENTION TO DOCUMENT ECF
3 13-3, PAGE 38. THIS IS AN ORGANIZATIONAL CHART, AND IT
4 SAYS: CATHOLIC SOCIAL SERVICES. ARCHDIOCESE OF
5 PHILADELPHIA. ORGANIZATIONAL STRUCTURE.

6 IS IT POSSIBLE THAT --

7 MS. OLIVER: NO. EXCUSE ME. WE DON'T
8 SEEM TO HAVE THAT. OURS GOES TO 37.

9 MS. BARCLAY: IT'S RIGHT HERE.

10 BY MS. BARCLAY:

11 Q. IS IT POSSIBLE THAT THE RELIGIOUS NATURE OF
12 CATHOLIC SOCIAL SERVICES ALLOWS IT TO REACH DIFFERENT
13 POPULATIONS AND DIFFERENT FAMILIES IN UNIQUE WAYS?

14 A. ASK THE QUESTION -- CAN YOU REPEAT THAT
15 QUESTION?

16 MS. OLIVER: IS THAT A QUESTION?

17 BY MS. BARCLAY:

18 Q. IS IT POSSIBLE THAT THE RELIGIOUS NATURE AND
19 MISSION OF CATHOLIC SOCIAL SERVICES ALLOWS IT TO REACH
20 DIFFERENT UNIQUE FAMILIES IN UNIQUE WAYS COMPARED TO
21 OTHER AGENCIES?

22 MS. OLIVER: OBJECTION; CALLS FOR
23 SPECULATION.

24 THE COURT: SUSTAINED.

25

1 BY MS. BARCLAY:

2 Q. IN ALL THE TIME YOU HAVE BEEN AT DHS, FOR THE
3 18 YEARS, I BELIEVE YOU SAID -- CORRECT, MS. ALI?

4 A. YES.

5 Q. -- YOU ARE NOT AWARE OF ANYONE FILING A
6 COMPLAINT AGAINST CATHOLIC SOCIAL SERVICES FOR
7 PERFORMING FOSTER CARE CONSISTENT WITH THIS RELIGIOUS
8 MISSION, ARE YOU?

9 THE COURT: ASK THAT QUESTION AGAIN.

10 BY MS. BARCLAY:

11 Q. IN THE 18 YEARS THAT YOU HAVE BEEN AT DHS, YOU
12 ARE NOT AWARE OF ANYONE FILING A COMPLAINT AGAINST
13 CATHOLIC FOR PERFORMING FOSTER CARE CONSISTENT WITH THIS
14 RELIGIOUS MISSION, ARE YOU?

15 A. I'M NOT -- I DON'T KNOW. NO.

16 Q. YOU ARE NOT AWARE --

17 A. I AM NOT AWARE.

18 Q. YOU ARE NOT AWARE OF ANYONE FILING A COMPLAINT
19 AGAINST CATHOLIC SOCIAL SERVICES IN THE PROVISION OF
20 FOSTER CARE, TO YOUR KNOWLEDGE?

21 A. I AM UNSURE.

22 Q. CAN YOU THINK THAT AT THIS TIME ANY EXAMPLE OF A
23 COMPLAINT FILED AGAINST CATHOLIC SOCIAL SERVICES IN THE
24 PROVISION OF FOSTER CARE SERVICES?

25 A. I AM REALLY NOT SURE.

1 Q. WOULD YOU HAVE REMEMBERED IF A COMPLAINT WAS
2 FILED AGAINST THE AGENCY?

3 MS. OLIVER: OBJECTION, YOUR HONOR; ASKED
4 AND ANSWERED.

5 THE COURT: SHE IS NOT SURE.

6 THE WITNESS: I'M NOT SURE. I DON'T KNOW
7 HOW --

8 MS. BARCLAY: I AM NOT SURE IF SHE'S NOT
9 SURE SHE WOULD NEVER HAVE KNOWN ABOUT THE COMPLAINTS
10 BECAUSE IT WOULD NOT HAVE COME TO HER ATTENTION, OR SHE
11 JUST AT THIS TIME CAN'T THINK OF ANY.

12 THE COURT: SHE SAID SHE IS NOT SURE. SO
13 SHE -- THAT'S HER ANSWER. SHE IS NOT SURE.

14 MS. BARCLAY: YOUR HONOR, MAY I HAVE
15 PERMISSION TO JUST CONFIRM WHAT THAT ANSWER MEANS?

16 THE COURT: I WOULD THINK THAT'S BASIC
17 ENGLISH. SHE IS NOT SURE.

18 MS. BARCLAY: OKAY.

19 BY MS. BARCLAY:

20 Q. YOU ARE NOT AWARE OF ANY FAMILIES THAT WERE
21 PREVENTED FROM BECOMING FOSTER PARENTS BECAUSE OF
22 CATHOLIC SOCIAL SERVICES?

23 MS. OLIVER: OBJECTION.

24 THE COURT: OVERRULED.

25 THE WITNESS: I WOULD NOT KNOW THAT.

1 BY MS. BARCLAY:

2 Q. SO YOU ARE NOT AWARE OF ANY PERSONALLY?

3 A. I DON'T -- I DON'T KNOW.

4 Q. YOU ARE FAMILIAR WITH DHS'S OPERATIONS,
5 POLICIES, AND PROCEDURES, INCLUDING THE PRACTICES THAT
6 ARE THE SUBJECT OF THIS ACTION?

7 A. YES.

8 Q. THE DHS FOSTER CARE CONTRACT SAYS THAT, QUOTE,
9 THE PROVIDER SHALL NOT REJECT A CHILD OR FAMILY FOR
10 SERVICES BASED UPON THE LOCATION OR CONDITION OF THE
11 FAMILY'S RESIDENCE, THEIR ENVIRONMENTAL OR SOCIAL
12 CONDITION, OR FOR ANY OTHER REASON IF THE PROFILES OF
13 SUCH CHILD OR FAMILY ARE CONSISTENT WITH THE PROVIDER'S
14 SCOPE OF SERVICES OR DHS'S APPLICABLE STANDARDS AS
15 LISTED IN THE PROVIDER AGREEMENT, UNLESS THE EXCEPTION
16 IS GRANTED BY THE COMMISSIONER OR THE COMMISSIONER'S
17 DESIGNEE IN HIS SOLE DISCRETION.

18 MY QUESTION IS: THIS PARAGRAPH IS
19 DEALING WITH A REJECTION OF REFERRALS, CORRECT?

20 A. YES.

21 Q. AND THIS IS REFERRING TO A REJECTION OF A
22 REFERRAL FROM DHS, CORRECT?

23 A. YES.

24 Q. NON-RELATIVE FAMILY MEMBERS GENERALLY APPROACH
25 FOSTER AGENCIES ABOUT BECOMING FOSTER PARENTS.

1 A. IT DEPENDS.

2 Q. ONE OF THE WAYS THAT NON-RELATIVE FAMILY MEMBERS
3 CAN BECOME A FOSTER AGENCY -- OR CAN BECOME FOSTER
4 PARENTS IS BY APPROACHING A FOSTER AGENCY, CORRECT?

5 A. YES. THAT'S ONE OF THE WAYS.

6 Q. AND IF THEY COME THROUGH THAT WAY, AGENCIES WILL
7 DECIDE TO EVALUATE THOSE FAMILIES AS PART OF THEIR
8 NORMAL INTAKE PROCESS.

9 A. AS PART OF THEIR NORMAL -- CAN YOU DEFINE WHAT
10 INTAKE PROCESS IS?

11 Q. LET ME ASK YOU THE QUESTION A DIFFERENT WAY.

12 IF AN AGENCY IS EVALUATING A FAMILY THAT
13 CAME TO THEM ON THEIR OWN, THAT TYPE OF FOSTER FAMILY IS
14 NOT ONE THAT WAS REFERRED TO THE AGENCY BY DHS, IS IT?

15 A. NOT NECESSARILY.

16 Q. AND KIN CARE IS A SITUATION WHERE DHS WOULD
17 REFER AN ENTIRE FAMILY, CORRECT?

18 A. YES.

19 Q. AND YOU TESTIFIED EARLIER THAT DHS, WHEN IT
20 MAKES REFERRALS, WILL IDENTIFY THE NEEDS OF THE FAMILY
21 AS WELL AS THE NEEDS OF THE CHILD TO TRY TO FIND THE
22 ABILITY TO MEET THOSE NEEDS, CORRECT?

23 A. THE NEEDS OF THE CHILD. SO WE DETERMINE THE
24 NEEDS OF THE CHILD AND WHETHER OR NOT THE FOSTER PARENT
25 OR THE KINSHIP CAREGIVER IS ABLE TO MEET THOSE NEEDS.

1 SO WE LEAD WITH THE NEEDS OF THE PARTICULAR CHILD.

2 Q. LET'S ASSUME THAT THERE WAS A FAMILY THAT WAS
3 PRIMARILY SPANISH SPEAKING. DHS WOULD CONSIDER THAT IN
4 A KIN CARE REFERRAL AS FAR AS REFERRING TO AN AGENCY
5 THAT WAS ABLE TO COMMUNICATE WITH THE FAMILY AND THE
6 CHILD, CORRECT?

7 A. IT WOULD DEPEND.

8 Q. SO YOU WOULD REFER A SPANISH-SPEAKING FAMILY TO
9 ANOTHER AGENCY THAT DIDN'T COMMUNICATE WITH THEM?

10 A. IF THE PARTICULAR AGENCY HAS SPANISH-SPEAKING
11 STAFF, THEN WE WOULD MAKE THAT REFERRAL TO THAT
12 PARTICULAR AGENCY.

13 Q. AND THAT WOULD BE A CONSIDERATION?

14 A. THAT WOULD BE A CONSIDERATION.

15 Q. THIS PARAGRAPH ALSO REFERS TO A PROVIDER'S SCOPE
16 OF SERVICES. PROVIDERS ARE REQUIRED TO COMPLY WITH
17 STATE LAW, CORRECT?

18 A. WHICH DOCUMENT ARE YOU REFERRING TO?

19 Q. IF YOU WANT TO TURN TO -- THIS IS ECF 13-4 OF
20 THE DOCUMENT YOU HAVE IN FRONT OF YOU AT PAGES 14 TO 15.

21 MS. OLIVER: COULD COUNSEL PLEASE STATE
22 AGAIN WHICH DOCUMENT YOU ARE REFERRING TO.

23 MS. BARCLAY: THIS IS THE CONTRACT.

24 MS. OLIVER: AND THE SPECIFIC PAGE AND
25 SECTION?

1 MS. BARCLAY: IT IS ECF 13-4, AND IT'S
2 PAGES 14 AND 15.

3 BY MS. BARCLAY:

4 Q. MS. ALI, WOULD IT BE HELPFUL IF I --

5 A. CAN YOU JUST MAKE SURE I HAVE THE CORRECT --
6 YES, PLEASE.

7 Q. MS. ALI, THIS PARAGRAPH SAYS THAT PROVIDERS
8 SHALL NOT REJECT A CHILD OR FAMILY FOR SERVICES BASED
9 UPON THE LOCATION OR CONDITION OF THE FAMILY'S
10 RESIDENCE, THEIR ENVIRONMENTAL OR SOCIAL CONDITION OR
11 FOR ANY OTHER REASON IF THE PROFILE OF SUCH CHILD OR
12 FAMILY IS CONSISTENT WITH PROVIDER'S SCOPE OF SERVICES.

13 MY QUESTION TO YOU EARLIER IS THAT A
14 PROVIDER'S SCOPE OF SERVICES INCLUDES COMPLYING WITH
15 APPLICABLE STATE LAWS, CORRECT?

16 A. YES.

17 THE COURT: DO YOU UNDERSTAND THE
18 QUESTION?

19 THE WITNESS: YES.

20 BY MS. BARCLAY:

21 Q. THIS PROVISION DOES NOT PREVENT AGENCIES FROM
22 REFERRING FAMILIES TO AN AGENCY THAT WOULD BE A BETTER
23 FIT FOR THE FAMILY, DOES IT?

24 A. THE AGENCY IS NOT --

25 MS. OLIVER: OBJECTION.

1 THE COURT: OVERRULED.

2 ANSWER THE QUESTION.

3 THE WITNESS: REPEAT THE QUESTION,
4 PLEASE.

5 BY MS. BARCLAY:

6 Q. THIS PROVISION THAT WE JUST READ DOES NOT
7 PREVENT AGENCIES FROM REFERRING FAMILIES TO ANOTHER
8 AGENCY THAT WOULD BE A BETTER FIT FOR THE FAMILY, DOES
9 IT?

10 A. SO PROVIDER AGENCIES WOULD NOT REFER A FAMILY
11 TO -- OR A CHILD TO ANOTHER AGENCY, AS I TESTIFIED
12 EARLIER, THAT THE CENTRAL REFERRAL UNIT IS A UNIT IN THE
13 DEPARTMENT OF HUMAN SERVICES THAT MAKES REFERRALS WHEN
14 YOU ARE GOING OUTSIDE OF A PARTICULAR AGENCY.

15 Q. I UNDERSTAND THAT. I AM NOT ASKING YOU ABOUT A
16 DHS REFERRAL OF A CHILD.

17 IF A PROSPECTIVE FOSTER PARENT APPROACHES
18 AN AGENCY ABOUT BEING CONSIDERED FOR THE HOME STUDY
19 CERTIFICATION PROCESS, THIS CONTRACT PROVISION DOES NOT
20 PREVENT THAT AGENCY FROM SENDING THAT FAMILY OR ALLOWING
21 THEM TO KNOW ABOUT ANOTHER AGENCY THAT WOULD BE A BETTER
22 FIT FOR THE FAMILY, DOES THAT PROVISION?

23 MS. OLIVER: OBJECTION, YOUR HONOR. I
24 RENEW MY OBJECTION WITH REGARD TO THE CONTRACT --

25 THE COURT: I THINK THAT'S AN UNFAIR

1 QUESTION BECAUSE IT'S ASKING FOR A NEGATIVE. SO I AM
2 GOING TO SUSTAIN THE OBJECTION.

3 MS. BARCLAY: LET ME SEE IF I CAN WORD
4 THAT A LITTLE DIFFERENTLY, YOUR HONOR.

5 BY MS. BARCLAY:

6 Q. SOMETIMES FAMILIES MIGHT COME TO AN AGENCY NOT
7 AS A DHS REFERRAL BUT ON THEIR OWN. WE DISCUSSED THAT
8 EARLIER, RIGHT?

9 A. YES.

10 Q. AND IF THAT FAMILY COMES TO AN AGENCY, THIS
11 CONTRACT PROVISION DOES NOT SAY ANYTHING ABOUT WHETHER
12 OR NOT THE AGENCY COULD GIVE THE FAMILY INFORMATION
13 ABOUT ANOTHER AGENCY BETTER ABLE TO MEET THEIR NEEDS.

14 MS. OLIVER: OBJECTION, YOUR HONOR.
15 QUESTIONS WITH REGARD TO THE CONTRACT ARE CONCLUSIONS OF
16 LAW.

17 THE COURT: SUSTAINED.

18 BY MS. BARCLAY:

19 Q. DO YOU ENFORCE THIS CONTRACT PROVISION IN AN
20 EVENHANDED MANNER?

21 THE COURT: WHAT CONTRACT PROVISION?

22 MS. BARCLAY: THIS CONTRACT, YOUR HONOR.

23 MS. OLIVER: OBJECTION, YOUR HONOR. IT'S
24 AN IMPROPER QUESTION FOR THIS WITNESS. SHE DOES NOT
25 ENFORCE THE CONTRACT.

1 MS. BARCLAY: YOUR HONOR, THIS WITNESS
2 HAS TESTIFIED THAT SHE IS FAMILIAR WITH DHS'S
3 OPERATIONS, POLICIES, AND PROCEDURES, INCLUDING THE
4 PRACTICES THAT ARE THE SUBJECT OF THIS ACTION. AND
5 UNDER THE FREE EXERCISE CLAUSE, ONE OF THE VERY
6 IMPORTANT LEGAL QUESTIONS IS NOT JUST WHAT A CONTRACT
7 PROVISION OR POLICY SAYS IN A VACUUM BUT HOW THE
8 RELEVANT OFFICIALS ENFORCE THAT POLICY AND IF THEY
9 ENFORCE IT IN AN EVEN MANNER. SO IT'S VERY RELEVANT TO
10 THE QUESTIONS AT ISSUE IN THIS CASE.

11 MS. OLIVER: YOUR HONOR, I SUBMIT THAT
12 SHE IS NOT THE RELEVANT OFFICIAL. IT'S NOT AN
13 APPROPRIATE QUESTION FOR THIS WITNESS.

14 THE COURT: WELL, SHE IS AN APPROPRIATE
15 WITNESS AS FAR AS THE POLICY. BUT I DON'T KNOW WHETHER
16 OR NOT THERE IS AN ISSUE OF EQUAL APPLICATION. I MEAN,
17 AS FAR AS SHE IS CONCERNED, SHE IS THE APPROPRIATE
18 PERSON.

19 BY MS. BARCLAY:

20 Q. DHS WOULD NOT PREVENT AN AGENCY FROM LETTING A
21 PROSPECTIVE FOSTER FAMILY KNOW ABOUT ANOTHER AGENCY THAT
22 MIGHT BETTER MEET THEIR NEEDS?

23 A. DHS WILL HAVE A PROBLEM WITH THAT. IF A
24 POTENTIAL FOSTER PARENT SEEKS OUT, AS YOU INDICATED, ON
25 THEIR OWN AND CONTACT A PROVIDER -- A FOSTER CARE

1 PROVIDER AGENCY WANTING TO BECOME A FOSTER PARENT, WE
2 WOULD EXPECT THE FOSTER CARE PROVIDER TO TRAIN AND
3 CERTIFY THAT FOSTER PARENT.

4 Q. NO MATTER WHAT?

5 A. IF IT'S IN -- IF IT'S ALIGNED WITH THE 3700
6 REGULATIONS.

7 Q. THE 3700 REGULATIONS MEANING?

8 A. THE FOSTER CARE REGULATIONS. SO WE EXPECT FOR
9 THE FOSTER CARE PROVIDER AGENCY -- AS A FOSTER CARE
10 PROVIDER AGENCY, WE EXPECT YOU TO RECRUIT, TO TRAIN, AND
11 TO CERTIFY POTENTIAL FOSTER PARENTS.

12 Q. AND YOUR POSITION IS THAT IT WOULD VIOLATE THOSE
13 REGULATIONS IF AN AGENCY LET PROSPECTIVE FOSTER PARENTS
14 KNOW THAT A DIFFERENT AGENCY WOULD BE A BETTER FIT FOR
15 THEM.

16 A. BECAUSE IT'S THE FOSTER PARENTS' CHOICE. SO IF
17 IN THE FOSTER PARENT SOUGHT OUT A PARTICULAR PROVIDER
18 AGENCY, THAT IS THE FOSTER CARE PROVIDER AGENCY THAT THE
19 FOSTER PARENT WANTS TO WORK WITH. SO WE WOULD EXPECT
20 THE FOSTER CARE PROVIDER AGENCY TO TRAIN AND CERTIFY
21 THEM.

22 Q. AND IT WOULD BE A VIOLATION OF DHS POLICY IF
23 THAT AGENCY REFERRED THEM TO A DIFFERENT AGENCY FOR ANY
24 REASON?

25 THE COURT: WELL, THAT'S A KIND OF A

1 BROAD QUESTION.

2 BY MS. BARCLAY:

3 Q. IT WOULD BE A VIOLATION OF DHS POLICY IF THEY
4 REFERRED THAT FAMILY TO ANOTHER AGENCY THAT THEY THOUGHT
5 WOULD BE A BETTER FIT FOR THAT FAMILY?

6 A. IF THAT REFERRAL -- DEFINE YOUR REFERRAL. WHAT
7 ARE YOU TALKING -- DEFINE YOUR REFERRAL.

8 Q. IF THAT AGENCY TOLD THE FAMILY THAT ANOTHER
9 AGENCY WOULD BE A BETTER FIT FOR THEM, AND SO -- SENT
10 THAT FAMILY TO A DIFFERENT AGENCY, IT'S YOUR POSITION
11 THAT THIS WOULD VIOLATE DHS POLICY?

12 A. YES.

13 Q. SO THE CONTRACT'S PROVISION ALSO ALLOWS THE
14 COMMISSIONER TO MAKE EXCEPTIONS IN HIS OR HER SOLE
15 DISCRETION, CORRECT?

16 MS. OLIVER: OBJECTION. QUESTION IS
17 REGARDING THE CONTRACT, YOUR HONOR.

18 MS. BARCLAY: I CAN MOVE ON, YOUR HONOR.

19 THE COURT: YES, PLEASE.

20 BY MS. BARCLAY:

21 Q. ARE YOU AWARE OF DHS MAKING EXCEPTIONS TO THIS
22 POLICY IN THE PAST?

23 A. NO, I AM NOT.

24 MS. OLIVER: OBJECTION TO WHAT POLICY.

25 MS. BARCLAY: THE CONTRACT PROVISION THAT

1 WE HAVE BEEN DISCUSSING.

2 THE COURT: WELL, I THINK YOU NEED TO BE
3 MORE SPECIFIC.

4 BY MS. BARCLAY:

5 Q. YOU TESTIFIED EARLIER THAT IF AN AGENCY REFERRED
6 A FAMILY TO A DIFFERENT AGENCY BECAUSE THEY THOUGHT IT
7 WOULD BE A BETTER FIT, THAT WOULD BE A VIOLATION OF DHS
8 POLICY. AND I AM ASKING, HAS DHS MADE EXCEPTIONS TO
9 THAT POLICY, THAT YOU ARE AWARE OF, IN THE PAST?

10 MS. OLIVER: OBJECTION. I BELIEVE THAT
11 COUNSEL IS MISCHARACTERIZING HER TESTIMONY.

12 THE COURT: OVERRULED.

13 CAN YOU ANSWER THE QUESTION?

14 THE WITNESS: CAN SHE ASK IT AGAIN?

15 BY MS. BARCLAY:

16 Q. YOU TESTIFIED THAT IF A FAMILY APPROACHED AN
17 AGENCY AND THE AGENCY REFERRED THEM TO A DIFFERENT
18 AGENCY AS BEING A BETTER FIT FOR THAT FAMILY, THAT WOULD
19 BE A VIOLATION OF DHS POLICY. AND I AM ASKING, ARE YOU
20 AWARE OF TIMES IN THE PAST WHERE DHS MADE AN EXCEPTION
21 TO THAT POLICY?

22 A. I AM NOT AWARE.

23 Q. ONLY CERTAIN AGENCIES ARE ALLOWED TO CARE FOR A
24 FOSTER CHILD WITH CERTAIN BEHAVIORAL HEALTH ISSUES,
25 CORRECT?

1 A. IT'S NOT TRUE.

2 Q. BEHAVIOR ISSUES ARE ONES THAT REQUIRE ADDITIONAL
3 EXPERTISE PROVIDED BY CERTAIN AGENCIES, CORRECT?

4 A. DEPENDING ON THE LEVEL OF BEHAVIORAL HEALTH
5 NEEDS OF THE YOUNG PERSON.

6 Q. BUT YOU HAVE PREVIOUSLY SAID UNDER OATH THAT
7 BEHAVIORAL ISSUES REQUIRE ADDITIONAL EXPERTISE THAT CAN
8 BETTER BE PROVIDED SOMETIMES BY ANOTHER AGENCY.

9 A. I ACTUALLY SAID SPECIALIZED BEHAVIORAL HEALTH,
10 WHICH IS DIFFERENT FROM THE BROADER BEHAVIORAL HEALTH.
11 YOUNG PEOPLE WHO COME INTO PLACEMENT BECAUSE OF THE
12 TRAUMA THAT THEY SUFFER MORE OFTEN THAN NOT HAVE SOME
13 BEHAVIORAL HEALTH NEEDS, WHICH WOULD BE SEPARATE AND
14 APART FROM SPECIALIZED BEHAVIORAL HEALTH, WHICH IS
15 OFTENTIMES A DIAGNOSIS, PRESCRIPTION MEDICATION, THE
16 FOSTER PARENT HAS TO MAINTAIN MEDICATION LOGS. SO THAT
17 IS DIFFERENT FROM JUST BEHAVIORAL HEALTH.

18 Q. OKAY. SO SPECIALIZED BEHAVIORAL HEALTH IS AN
19 ISSUE THAT REQUIRES ADDITIONAL EXPERTISE BY AN AGENCY?

20 A. YES.

21 Q. SUCH AGENCIES HAVE TO OFFER PARENTS SPECIALIZED
22 TRAINING, RIGHT?

23 A. YES.

24 Q. THEY ALSO HAVE TO MEET ADDITIONAL REQUIREMENTS
25 WITH REGARD TO STAFF?

1 A. YES.

2 Q. THESE AGENCIES HAVE AN ADD-ON CONTRACT WITH THE
3 CITY THAT LETS THEM PROVIDE THOSE SPECIALIZED BEHAVIORAL
4 HEALTH SERVICES FOR THOSE CHILDREN, CORRECT?

5 A. YES.

6 Q. FOR INSTANCE, ONE AGENCY THAT HAS THOSE
7 BEHAVIORAL HEALTH ADD-ON CONTRACTS IS DEVEREUX?

8 A. YES.

9 Q. SOME FOSTER PARENTS MIGHT ONLY BE INTERESTED IN
10 FOSTERING A CHILD WITH THOSE SORT OF SPECIALIZED
11 BEHAVIORAL ISSUES. IF SUCH A PARENT SHOWED UP AT AN
12 AGENCY WITHOUT THAT SPECIALTY IN THAT CONTRACT, THEN
13 THAT AGENCY WOULD NEED TO REFER THAT FAMILY TO AN AGENCY
14 WITH A CONTRACT LIKE DEVERO, RIGHT?

15 A. IF THE FOSTER PARENT IS REQUESTING THAT.

16 Q. RIGHT.

17 A. YES.

18 Q. IF THE FOSTER PARENT IS REQUESTING TO FOSTER A
19 CHILD WITH SPECIALIZED BEHAVIORAL HEALTH ISSUES.

20 A. SO WHAT WE WOULD ASK THE FOSTER CARE PROVIDER
21 AGENCY TO DO IS EXPLAIN TO THE POTENTIAL FOSTER PARENT
22 ABOUT THE TYPE OF YOUNG PEOPLE THAT THEY PROVIDE FOSTER
23 CARE FOR, AND IF THE FOSTER PARENT DOES NOT WANT TO
24 FOSTER WITH THAT PARTICULAR AGENCY, THEN IT WOULD BE
25 THEIR CHOICE TO FOSTER FOR ANOTHER AGENCY.

1 Q. AND SO IF THEY ONLY WANTED TO FOSTER YOUNG
2 PEOPLE WITH THAT SPECIALIZED BEHAVIORAL HEALTH ISSUE,
3 THEY WOULD NEED TO BE REFERRED TO AN AGENCY WITH THAT
4 SPECIALTY?

5 A. YES.

6 Q. HAVE YOU GRANTED A FORMAL EXCEPTION FOR THESE
7 TYPES OF REFERRALS?

8 THE COURT: FORMAL EXCEPTION, THAT IS
9 ASSUMING THAT AN EXCEPTION IS NECESSARY OR REQUIRED.

10 MS. BARCLAY: I AM NOT ASSUMING THAT AN
11 EXCEPTION IS REQUIRED. I AM ASKING IF AN EXCEPTION HAS
12 EVER BEEN GRANTED. THAT YOU ARE AWARE OF.

13 THE COURT: WELL, UNDER THE CIRCUMSTANCES
14 THAT YOU HAVE OUTLINED, YOU ARE ASSUMING THAT ONE IS
15 REQUIRED.

16 BY MS. BARCLAY:

17 Q. IS AN EXCEPTION REQUIRED FROM THE DHS POLICY WE
18 WERE DISCUSSING EARLIER?

19 THE COURT: IF?

20 BY MS. BARCLAY:

21 Q. TO REFER A FAMILY TO A DIFFERENT AGENCY WITH THE
22 SPECIALIZED BEHAVIORAL HEALTH SPECIALTY.

23 A. I GUESS THE DIFFICULTY THAT I AM HAVING IS THAT
24 THIS SPEAKS TO FOSTER PARENTS WHO ARE -- WHO --
25 INDIVIDUALS WHO ARE ALREADY FOSTER PARENTS AND NOT A

1 POTENTIAL.

2 Q. NO, MY HYPOTHETICAL IS ASSUMING PROSPECTIVE
3 FOSTER PARENTS WHO ARE ONLY INTERESTED IN FOSTERING
4 YOUTH WITH SPECIALIZED BEHAVIORAL HEALTH ISSUES. SO IT
5 DOES NOT REQUIRE A FORMAL EXCEPTION IN ORDER FOR AN
6 AGENCY TO REFER THEM TO A DIFFERENT AGENCY IF THEY COULD
7 PROVIDE THAT BEHAVIORAL HEALTH EXPERTISE, DOES IT?

8 A. NO.

9 Q. ONLY CERTAIN AGENCIES ARE ALLOWED TO CARE FOR
10 FOSTER CHILDREN WITH CERTAIN SPECIALIZED MEDICAL ISSUES,
11 RIGHT?

12 A. DEPENDS, AGAIN. AND IT DEPENDS ON THE LEVEL OF
13 MEDICAL NEED. FOR EXAMPLE, A MEDICAL ONE IN WHICH A
14 YOUNG PERSON MAY HAVE ASTHMA, FOR EXAMPLE, COULD BE
15 CARED FOR BY A GENERAL FOSTER CARE FOSTER PARENT.

16 Q. SO -- BUT THERE ARE SOME MEDICAL NEEDS THAT CAN
17 ONLY BE PROVIDED FOR BY AN AGENCY WITH THAT SPECIALTY,
18 CORRECT?

19 A. YES.

20 Q. AND THESE AGENCIES ALSO HAVE TO RECEIVE AN
21 ADDITIONAL LICENSE THROUGH THE STATE OFFICE OF MEDICAL
22 ASSISTANCE?

23 A. YES.

24 Q. THEY THEN RECEIVE AN ADDITIONAL LINE ITEM,
25 ADD-ON ON THE FOSTER CARE CONTRACT, TO PROVIDE THESE

1 SPECIAL MEDICAL SERVICES, RIGHT?

2 A. I AM NOT COMPLETELY FAMILIAR WITH THE LINE ITEM.

3 Q. JEWISH FAMILY CHILDREN SERVICES IS ONE AGENCY
4 THAT HAS THIS MEDICAL EXPERTISE THAT THEY PROVIDE FOR
5 FAMILIES, CORRECT?

6 A. YES.

7 Q. SOME FOSTER PARENTS -- PROSPECTIVE FOSTER
8 PARENTS MIGHT ONLY WANT TO FOSTER A CHILD WITH
9 PARTICULAR MEDICAL ISSUES, RIGHT?

10 A. YES.

11 Q. IF SUCH A PARENT SHOWED UP IN AN AGENCY THAT
12 DIDN'T HAVE THIS SPECIAL CONTRACT, THEY WOULD NEED TO BE
13 REFERRED TO AN AGENCY LIKE JEWISH FAMILY THAT DOES HAVE
14 THAT EXPERTISE, CORRECT?

15 A. WE WOULD ASK THE FOSTER CARE PROVIDER AGENCY TO
16 EXPLAIN THE CHILDREN THAT THEY SERVICE, SOME OF WHICH
17 WILL BE MEDICAL LEVEL ONE, AND LET THE FOSTER PARENT
18 DECIDE WHETHER OR NOT THEY WANT TO TRANSFER -- POTENTIAL
19 FOSTER PARENT, WHETHER OR NOT THEY WANT TO PROVIDE
20 FOSTER CARE FOR MEDICAL AGENCY.

21 Q. BUT IF THEY ONLY WANTED TO FOSTER YOUTH WITH
22 THIS SPECIALIZED MEDICAL ISSUE, THERE ARE SOME AGENCIES
23 THAT THEY CANNOT RECEIVE THAT SERVICE FROM, CORRECT?

24 A. CORRECT.

25 Q. AND SO IF THEY WANTED TO BE FOSTER PARENTS, THEY

1 WOULD NEED TO BE REFERRED TO A DIFFERENT AGENCY, LIKE
2 JEWISH FAMILY CHILDREN, THAT HAS THAT SPECIALTY?

3 A. YES.

4 THE COURT: THE BIGGEST PROBLEM IS I
5 THINK YOU ARE DISAGREEING WHAT IS A REFERRAL.

6 THE WITNESS: YES.

7 THE COURT: I MEAN, WHAT IS IT YOU ARE
8 TRYING TO DO -- AND I THINK IT'S INAPPROPRIATE -- IS TO
9 GET THIS WITNESS TO USE THE SAME WORDS THAT YOU ARE
10 USING AND MEAN THE SAME THING. SHE CLEARLY IS NOT ON
11 THE SAME WAVELENGTH AS YOU WHEN TALKING ABOUT REFERRAL.
12 AND I THINK THAT'S WHERE THE CONFUSION LIES.

13 BY MS. BARCLAY:

14 Q. SO THERE ARE TWO DIFFERENT WAYS THAT I AM AWARE
15 OF THAT THE WORD "REFERRAL" CAN BE USED. IT CAN MEAN
16 REFERRAL FROM DHS TO AGENCIES, RIGHT, FROM YOUR CENTRAL
17 REFERRAL UNIT?

18 A. YES.

19 Q. AND SO FOR EASE OF REFERENCE, WHAT I HAVE BEEN
20 TALKING ABOUT IS THAT SOMETIMES AGENCIES CAN PROVIDE
21 ADDITIONAL INFORMATION TO FAMILIES ABOUT OTHER AGENCIES
22 THAT WOULD SERVE THEIR NEEDS AND GIVE THEM THE CHOICE TO
23 GO TO THAT AGENCY?

24 A. AND I AM INVOLVED IN THAT PROCESS.

25 Q. AND SO WHAT I AM EXPLAINING IS THAT -- WHAT I

1 UNDERSTAND, IF A FAMILY WENT TO -- WANTED TO ONLY FOSTER
2 CHILDREN WITH A SPECIAL MEDICAL CONDITION, FOR EXAMPLE,
3 AND IF THEY APPROACHED AN AGENCY THAT DOES NOT HAVE THAT
4 SPECIALTY, IT WOULD BE APPROPRIATE FOR THAT AGENCY TO
5 GIVE THEM INFORMATION ABOUT OTHER AGENCIES THAT WOULD
6 BETTER MEET THEIR NEEDS AND GIVE THE FAMILY THE CHOICE
7 TO GO TO THAT AGENCY.

8 THE COURT: WELL, THAT'S NOT WHAT
9 HAPPENED HERE. THAT'S SPECULATIVE.

10 MS. BARCLAY: I AM TRYING TO UNDERSTAND
11 WHAT DHS'S POSITION IS ON THE APPLICATION OF POLICY,
12 YOUR HONOR.

13 THE COURT: I THINK THAT THE WITNESS HAS
14 ALREADY STATED WHAT DHS'S POSITION IS. THE POLICY THAT
15 YOU ARE ASKING ABOUT IS PURELY SPECULATIVE. IT'S NOT
16 THE SITUATION THAT WE HAVE HERE. AT LEAST I HAVE NOT
17 HEARD ANYTHING ABOUT SUCH A SITUATION.

18 MS. BARCLAY: MRS. SIMMS-BUSCH DID
19 TESTIFY ABOUT REFERRALS THAT WERE MADE BY AGENCIES,
20 ABOUT USING THE WORD REFERRAL; SHE MEANT SENDING
21 FAMILIES TO OTHER AGENCIES THAT BETTER MET THEIR NEEDS
22 BECAUSE THOSE FAMILIES WANTED TO CARE FOR CHILDREN WITH
23 MEDICAL EXPERTISE.

24 THAT IS RELEVANT TO THE WAY IN WHICH THIS
25 POLICY IS APPLIED VIS-À-VIS OTHER TYPES OF SITUATIONS

1 WHERE AN AGENCY MIGHT SEND A FAMILY TO A DIFFERENT
2 AGENCY FOR A BETTER FIT, YOUR HONOR.

3 THE COURT: I AM GOING TO SUSTAIN THE
4 OBJECTION. THERE IS NO OBJECTION. I AM GOING TO.

5 MS. OLIVER: OBJECTION, YOUR HONOR.

6 THE COURT: I AM GOING TO SUSTAIN THE
7 OBJECTION.

8 BY MS. BARCLAY:

9 Q. SOME FOSTER AGENCIES THAT DHS WORKS WITH HAS
10 ADVERTISED THAT THEY ONLY SERVE KIN CARE POPULATIONS,
11 CORRECT?

12 A. I DON'T KNOW OF ANY FOSTER CARE PROVIDER THAT
13 DHS PROVIDES FOSTER CARE WITH THAT ONLY DOES KIN.
14 FOSTER CARE PROVIDER AGENCIES DO BOTH KIN AND FOSTER
15 CARE.

16 MS. BARCLAY: PERMISSION TO APPROACH THE
17 WITNESS, YOUR HONOR?

18 THE COURT: YES.

19 MS. BARCLAY: I AM ACTUALLY GOING TO MOVE
20 ON, YOUR HONOR.

21 THE COURT: OKAY.

22 BY MS. BARCLAY:

23 Q. SOME AGENCIES HAVE AN EXPERTISE IN CERTAIN
24 LATINO COMMUNITIES, CORRECT?

25 A. YES.

1 Q. FOR EXAMPLE, CONCILIO WAS ONE AGENCY THAT DHS
2 WORKS WITH WITH THIS EXPERTISE?

3 A. YES.

4 Q. ANOTHER AGENCY WITH THIS SPECIALTY IS APM?

5 A. YES.

6 Q. IF A SPANISH-SPEAKING PROSPECTIVE FOSTER FAMILY
7 APPROACHED AN AGENCY THAT DIDN'T HAVE SPANISH-SPEAKING
8 SOCIAL WORKERS, IT WOULD BE APPROPRIATE FOR THE AGENCY
9 TO TELL THE FAMILY ABOUT ANOTHER AGENCY, LIKE CONCILIO,
10 THAT CAN BETTER MEET THEIR NEEDS, CORRECT?

11 A. WE EXPECT FOR FOSTER CARE PROVIDER AGENCIES,
12 SINCE WE SERVICE THE ENTIRE CITY OF PHILADELPHIA, TO
13 PROVIDE INTERPRETING SERVICES FOR FOSTER PARENTS AND
14 BIOLOGICAL PARENTS. WE DON'T EXPECT THEM TO NECESSARILY
15 REFER TO A SPANISH-SPEAKING AGENCY.

16 Q. BUT IF AN AGENCY DID MAKE THAT REFERRAL, THAT
17 WOULD BE APPROPRIATE IF THEY THOUGHT ANOTHER AGENCY
18 COULD BETTER MEET THE NEEDS OF THE SPANISH-SPEAKING
19 FAMILY, RIGHT?

20 A. IF THE FOSTER PARENT CHOOSES TO GO TO A
21 DIFFERENT AGENCY. IF THE FOSTER PARENT APPROACHED THAT
22 FOSTER CARE PROVIDER AGENCY AND WANTED TO BE A FOSTER
23 PARENT, WE EXPECT THE FOSTER CARE PROVIDER AGENCY TO
24 TRAIN AND CERTIFY THAT FOSTER PARENT.

25 Q. SO IF AN AGENCY SAID, WE DON'T THINK WE WOULD BE

1 THE BEST FIT FOR YOU BECAUSE WE DON'T HAVE THE LANGUAGE
2 EXPERTISE TO BEST SERVE YOUR NEEDS, AND SO WE ARE NOT
3 ABLE TO PROVIDE CERTIFICATION FOR YOU, IF AN AGENCY DID
4 THAT, YOU THINK THAT WOULD BE A VIOLATION OF DHS
5 EXPECTATIONS?

6 A. IF THE AGENCY WAS TO DO THAT, THE AGENCY ALSO
7 NEEDS TO ASK THE FOSTER PARENT WHAT IS HIS OR HER CHOICE
8 AND ALLOW THE FOSTER PARENT TO MAKE THAT DECISION.

9 Q. IF THE FOSTER PARENT WANTED TO WORK WITH AN
10 AGENCY AND THOUGHT THAT THE AGENCY COULD NOT MEET THEIR
11 NEEDS AND THE AGENCY SAID, WE DON'T THINK WE ARE ABLE TO
12 MEET THEIR LANGUAGE NEEDS, BUT WE CAN SEND YOU TO
13 ANOTHER AGENCY THAT DOES, AFTER EXPLAINING TO THE FAMILY
14 WHY THAT WAS THE CASE, THAT WOULD BE APPROPRIATE, RIGHT?

15 MS. OLIVER: OBJECTION, YOUR HONOR. I
16 BELIEVE THAT THIS LINE OF QUESTIONING HAS BEEN ASKED AND
17 ANSWERED NUMEROUS TIMES.

18 THE COURT: SUSTAINED. SUSTAINED.

19 BY MS. BARCLAY:

20 Q. FEDERAL LAW REQUIRES THAT NATIVE AMERICAN
21 CHILDREN GENERALLY BE PLACED WITH THE TRIBAL MEMBERS OR
22 INDIVIDUALS OF NATIVE AMERICAN ANCESTRY, RIGHT?

23 MS. OLIVER: OBJECTION AS TO WHAT FEDERAL
24 LAW REQUIRES.

25 MS. BARCLAY: THE WITNESS'S KNOWLEDGE

1 ABOUT WHETHER OR NOT IT'S APPROPRIATE TO SEND A FOSTER
2 FAMILY TO A DIFFERENT AGENCY IS RELEVANT, YOUR HONOR.

3 THE COURT: OVERRULED. SHE CAN ANSWER.

4 THE WITNESS: REPEAT THE QUESTION,
5 PLEASE.

6 BY MS. BARCLAY:

7 Q. FEDERAL LAW REQUIRES NATIVE AMERICAN CHILDREN
8 GENERALLY TO BE PLACED WITH TRIBAL MEMBERS OR
9 INDIVIDUALS WITH NATIVE AMERICAN ANCESTRY, RIGHT?

10 A. YES.

11 Q. SOME AGENCIES IN PENNSYLVANIA SPECIALIZE IN
12 PLACING NATIVE AMERICAN CHILDREN, RIGHT?

13 A. I CAN ONLY SPEAK TO PHILADELPHIA.

14 Q. YOU ARE NOT AWARE OF OTHER AGENCIES THAT HAVE
15 THAT SPECIALTY?

16 A. NOT IN PHILADELPHIA.

17 Q. ARE THERE ANY SUCH AGENCIES IN PHILADELPHIA,
18 THAT YOU ARE AWARE OF?

19 A. NO. THERE AREN'T ANY, THAT I AM AWARE OF.

20 Q. SO IF A NON-NATIVE AMERICAN FAMILY WENT TO AN
21 AGENCY IN PHILADELPHIA WANTING TO FOSTER A NATIVE
22 AMERICAN CHILD, THEY WOULD BE UNABLE TO DO SO, CORRECT?

23 A. REPEAT THE QUESTION.

24 MS. OLIVER: OBJECTION; CALLS FOR
25 SPECULATION.

1 THE COURT: SUSTAINED.

2 BY MS. BARCLAY:

3 Q. DHS GUIDELINES EMPHASIZE THE IMPORTANCE OF
4 GEOGRAPHIC PROXIMITY FOR FOSTER CARE PLACEMENTS,
5 CORRECT?

6 A. REPEAT THAT.

7 Q. DHS GUIDELINES EMPHASIZE THE IMPORTANCE OF
8 GEOGRAPHIC PROXIMITY FOR FOSTER CARE PLACEMENTS,
9 CORRECT?

10 A. I AM TRYING TO DETERMINE WHAT ARE YOU SAYING.
11 WHAT ARE YOU CITING?

12 Q. YOU SAID EARLIER IN YOUR TESTIMONY THAT
13 GEOGRAPHY IS IMPORTANT FOR CONSIDERATION OF THE
14 PLACEMENT OF THE CHILD BECAUSE YOU WANT TO KEEP THE
15 CHILD IN THEIR COMMUNITY, CORRECT?

16 A. YES. HOWEVER, I ALSO TESTIFIED THAT IF, IN
17 FACT, THERE WAS A BETTER FIT OUTSIDE OF THE COMMUNITY,
18 THAT WE WOULD PLACE THE CHILD OUTSIDE OF THEIR
19 COMMUNITY. AND THEN IT WOULD BE THE CORE CASE MANAGER'S
20 RESPONSIBILITY TO ENSURE THAT THE CHILD MAINTAINED
21 EDUCATIONAL STABILITY AS WELL AS BEHAVIORAL HEALTH AND
22 MEDICAL STABILITY.

23 Q. YOU SAID THAT 52 PERCENT OF CHILDREN ARE WITHIN
24 5 MILES OF THEIR ORIGINAL HOME, RIGHT?

25 A. YES.

1 Q. AND SO SOMETIMES REFERRALS CAN BE MADE OR
2 FAMILIES ARE SENT TO OTHER AGENCIES WHERE IT WILL BE
3 CLOSER TO THE CHILD'S HOME, IF THAT WOULD BE IN THE
4 CHILD'S BEST INTEREST, RIGHT?

5 A. NO.

6 Q. YOU ARE NOT AWARE OF ANY SUCH REFERRALS FOR
7 GEOGRAPHIC REASONS?

8 A. NO. WE DON'T DO REFERRALS FOR GEOGRAPHIC
9 REASONS. OUR FOSTER CARE PROVIDER AGENCIES ARE
10 CITYWIDE. SO IF AFTER THE CENTRAL REFERRAL UNIT
11 SENDS -- OR MAKES A LEVEL OF CARE DECISION AND SENDS
12 OVER THE REFERRAL TO ALL OF THE FOSTER CARE AGENCIES
13 THAT PROVIDE THAT LEVEL OF SERVICE, THE FOSTER CARE
14 PROVIDER AGENCIES WILL DETERMINE THE BEST FIT FOR THE
15 MOST APPROPRIATE -- THE MOST APPROPRIATE FOSTER PARENT
16 FOR THAT PARTICULAR CHILD.

17 SO WE WILL NOT -- IF THE FOSTER PARENT IS
18 AN APPROPRIATE PLACEMENT, THEN WE WILL PLACE THAT CHILD
19 WITH THEIR FOSTER PARENT AND, AGAIN, EXPECT THAT THE
20 SERVICES THAT THE CHILD RECEIVE IN THEIR COMMUNITY,
21 WHICH IS PRIMARILY THEIR EDUCATIONAL NEEDS, TO ENSURE
22 THAT THAT CHILD STAYS IN THEIR SCHOOL, WE CALL THEIR
23 SCHOOL OF ORIGIN.

24 Q. IF A FAMILY WANTED TO FOSTER A CHILD IN THEIR
25 OWN NEIGHBORHOOD, BUT THEY APPROACHED A FOSTER AGENCY ON

1 THE OTHER SIDE OF THE CITY, WOULD IT EVER BE APPROPRIATE
2 FOR THE FOSTER AGENCIES THEY APPROACHED TO SEND THEM TO
3 AN AGENCY THAT IS CLOSER TO THEIR OWN NEIGHBORHOOD?

4 A. SO WHAT I WOULD SAY IN RESPONSE TO THAT IS THAT
5 FOSTER CARE PROVIDERS WANT TO INCREASE THEIR CAPACITY
6 WITH RESOURCE EXPERIENCE WITH FOSTER PARENTS.
7 THEREFORE, THE FOSTER CARE PROVIDER WOULD TRY TO
8 ACCOMMODATE THEIR FOSTER PARENT. THEY JUST WOULD NOT
9 REFER THEM TO ANOTHER AGENCY THAT IS CLOSER.

10 WHAT I MEAN BY ACCOMMODATING, THEY WOULD,
11 IF POSSIBLE, PROVIDE THE TRAINING THAT THE FOSTER PARENT
12 NEEDS IN THEIR OWN HOME AS OPPOSED TO HAVING THE FOSTER
13 PARENT TRAVEL ACROSS THE CITY. IF IT IS THE FOSTER
14 PARENT'S DESIRE, THEN THAT'S ANOTHER QUESTION.

15 MS. BARCLAY: ONE MOMENT, YOUR HONOR.

16 BY MS. BARCLAY:

17 Q. YOU HAVE REPRESENTED TO THIS COURT THAT YOU'RE
18 COMMITTED TO ENSURING PLACEMENT IN A CHILD'S BEST
19 INTEREST, CORRECT?

20 A. YES.

21 Q. AND DHS LEADERSHIP HAS SAID THAT THEY WILL
22 CONTINUE TO CONSIDER ANY REQUESTS INDICATING THAT A
23 PLACEMENT WITH CATHOLIC IS NOT IN A CHILD'S PARTICULAR
24 BEST INTEREST?

25 A. YES.

1 Q. THIS WOULD INCLUDE PLACING A CHILD WITH A FOSTER
2 FAMILY WITH CATHOLIC, WHICH HAS ALREADY CARED FOR THE
3 REST OF THE CHILD'S FAMILY?

4 A. YES.

5 Q. THIS COULD ALSO INCLUDE PLACING THE SIBLINGS OF
6 A CATHOLIC FAMILY THAT HAS A PREEXISTING RELATIONSHIP
7 WITH A CHILD?

8 A. YES.

9 Q. YOU HAVE NEVER COMMUNICATED IN WRITING TO OTHER
10 CUA'S THAT THEY ARE ALLOWED TO REFER CHILDREN TO
11 CATHOLIC IN THESE INSTANCES, HAVE YOU?

12 MS. OLIVER: OBJECTION.

13 THE COURT: OVERRULED.

14 THE WITNESS: THE CUA'S DO NOT MAKE
15 REFERRALS TO OTHER FOSTER CARE AGENCIES. THOSE
16 REFERRALS ARE MADE BY WAY OF THE CENTRAL REFERRAL UNIT.
17 BY MS. BARCLAY:

18 Q. BUT CUA'S DO PROVIDE INPUT FROM THE CENTRAL
19 REFERRAL UNIT.

20 A. THEY PROVIDE INPUT BASED ON THE NEEDS OF THE
21 PARTICULAR CHILD.

22 Q. RIGHT.

23 A. THEY PROVIDE INPUT ABOUT THE CHILD.

24 Q. THEY PROVIDE INPUT ABOUT WHAT PLACEMENT IT WOULD
25 BE IN THE BEST INTEREST OF THE CHILD, CORRECT?

1 A. WHO PROVIDES INFORMATION -- THE CUA CASE
2 MANAGERS PROVIDE INPUT ABOUT THE CHILD'S NEEDS. THE
3 CENTRAL REFERRAL UNIT IN CONCERT WITH COMMUNITY
4 BEHAVIORAL HEALTH, WHICH IS THE MANAGED CARE
5 ORGANIZATIONS, ARE THE INDIVIDUALS WHO DETERMINE THE
6 APPROPRIATE LEVEL OF SERVICE FOR THE PARTICULAR CHILD.

7 Q. AND YOU HAVE NOT COMMUNICATED TO THOSE CUA'S
8 THAT DHS WILL BE CONSIDERING STILL MAKING PLACEMENTS
9 WITH CATHOLIC IF THAT PLACEMENT IS IN THE BEST INTEREST
10 OF THE CHILD IN WRITING, HAVE YOU?

11 A. WHAT WE HAVE COMMUNICATED --

12 Q. I AM NOT ASKING WHAT YOU HAVE --

13 A. YES, WE HAVE.

14 Q. WHAT HAVE YOU COMMUNICATED IN WRITING?

15 A. SO WE COMMUNICATED TO THE CUA'S AROUND, I
16 BELIEVE, MARCH THE 26 OR MARCH THE 27 -- I CAN'T
17 REMEMBER OFFHAND -- THAT WE DID NOT WANT TO SEE ANY
18 PLACEMENT DISRUPTIONS OF YOUNG PEOPLE. AND THERE WAS
19 SOME OTHER POINTERS, SOME OTHER -- SO WE DID.

20 Q. YOU COMMUNICATED TO THE CUA'S, WE ARE ASKING
21 THAT YOU REFRAIN FROM MAKING ANY FOSTER CARE REFERRALS
22 TO BETHANY CHRISTIAN SERVICES AND CATHOLIC SOCIAL
23 SERVICES, RIGHT? THAT WAS IN YOUR COMMUNICATION TO
24 THEM.

25 A. THAT WAS PART OF IT. SOME ADDITIONAL LANGUAGE.

1 Q. THAT WAS A QUOTE FROM YOUR COMMUNICATION TO
2 THEM.

3 A. AND SOME ADDITIONAL LANGUAGE, YES.

4 Q. THE E-MAIL ALSO STATED: PLEASE FORWARD THIS
5 E-MAIL TO YOUR STAFF, PARTICULARLY STAFF WITH THE
6 RESPONSIBILITY TO IDENTIFY PLACEMENT, CORRECT?

7 A. YES.

8 Q. YOU DID NOT SAY ANYTHING IN THIS E-MAIL ABOUT
9 ENSURING THAT ADDITIONAL PLACEMENTS WERE GOING TO BE
10 WITH CATHOLIC IF IT WOULD BE IN THE BEST INTEREST OF THE
11 CHILD.

12 A. NO. BECAUSE THAT INFORMATION WAS COMMUNICATED
13 TO CATHOLIC --

14 Q. BUT --

15 A. -- TO KEEP IT CENTRALIZED.

16 Q. -- YOU COMMUNICATED THAT TO OTHER CUA EXECUTIVE
17 LEADERSHIP.

18 A. NO. AND WE WOULDN'T HAVE.

19 Q. AND YOU HAVE NOT COMMUNICATED THAT TO DHS STAFF
20 IN WRITING, HAVE YOU?

21 A. NO.

22 Q. YOU HAVE NOT COMMUNICATED TO ANY STAFF IN THE
23 CENTRAL REFERRAL UNITS THAT THEY CAN REFER CHILDREN TO
24 CATHOLIC IF IT WOULD BE IN THEIR BEST INTEREST, HAVE
25 YOU?

1 A. WHAT WAS COMMUNICATED TO THE --

2 Q. YOU HAVE NOT COMMUNICATED IN WRITING TO THE
3 CENTRAL REFERRAL UNIT STAFF THAT THEY CAN MAKE REFERRALS
4 TO CATHOLIC IF IT WOULD BE IN THE BEST INTEREST OF
5 CHILDREN?

6 A. NO.

7 Q. AND YOU DIDN'T SAY ANYTHING IN THIS E-MAIL ABOUT
8 ENSURING THAT CHILDREN WOULD BE PLACED WITH SIBLING
9 GROUPS, DID YOU?

10 A. NO.

11 Q. YOU DIDN'T SAY ANYTHING IN THIS E-MAIL ABOUT
12 ENSURING THAT CHILDREN COULD BE PLACED WITH FAMILIES
13 WITH PREEXISTING RELATIONSHIPS?

14 A. NO.

15 Q. THIS E-MAIL -- AND THIS IS ECF 13, EXHIBIT 1,
16 ATTACHED E, THIS WAS SENT OUT ON MARCH 27, CORRECT?

17 A. DO I HAVE IT HERE?

18 MS. BARCLAY: PERMISSION TO APPROACH THE
19 WITNESS, YOUR HONOR?

20 THE COURT: YES.

21 MS. BARCLAY: YOUR HONOR, I AM
22 APPROACHING THE WITNESS WITH ECF 13-6. IT'S
23 ATTACHMENT E. IT'S ALREADY BEEN ADMITTED.

24 THE COURT: WHAT IS YOUR QUESTION?

25

1 BY MS. BARCLAY:

2 Q. MS. ALI, YOU SENT THIS E-MAIL OUT ON MARCH 26,
3 CORRECT?

4 A. YES.

5 Q. AND THIS E-MAIL WAS FORWARDED ON MARCH 27TH TO
6 STAFF BY STACEY BOYD?

7 A. YES.

8 Q. AND STACEY BOYD REPORTS TO YOU, CORRECT?

9 A. YES, SHE DOES.

10 Q. AND SHE ALSO WORKS FOR DHS?

11 A. YES, SHE DOES.

12 Q. AND IN HER FOLLOW-UP E-MAIL, SHE SAID: GOOD
13 AFTERNOON, EXECUTIVE LEADERSHIP. PLEASE SEE BELOW. THE
14 INFORMATION MUST BE COMMUNICATED TO YOUR RESPECTIVE
15 STAFF IN ORDER TO ENSURE THAT -- ALL CAPS -- NO
16 REFERRALS ARE SENT TO THESE TWO PROVIDERS EFFECTIVE
17 IMMEDIATELY.

18 DID I READ THAT RIGHT?

19 A. YES.

20 Q. SHE DID NOT SAY ANYTHING ABOUT ENSURING
21 ADDITIONAL PLACEMENTS FOR THE BEST INTEREST OF THE
22 CHILD.

23 A. NO.

24 Q. SHE DID NOT SAY ANYTHING ABOUT INSTRUCTING THE
25 CHILDREN COULD BE PLACED WITH SIBLING GROUPS.

1 A. NO.

2 Q. SHE DID NOT SAY ANYTHING ABOUT INSTRUCTING THE
3 CHILDREN COULD STILL BE PLACED WITH FAMILIES WITH A
4 PREEXISTING RELATIONSHIP.

5 A. NO.

6 Q. NOW, THE EVENT THAT PRECIPITATED THIS E-MAIL IS
7 THAT ON MARCH 24TH, CATHOLIC LET THE COMMISSIONER KNOW
8 THAT THEY HAD ACCEPTED A REFERRAL FOR A CHILD.

9 A. I AM NOT SURE.

10 MS. OLIVER: OBJECTION. YOUR HONOR, CAN
11 COUNSEL CLARIFY THAT QUESTION OR REPEAT THE QUESTION?

12 BY MS. BARCLAY:

13 Q. YOU WERE DISCUSSING THIS ISSUE WITH COMMISSIONER
14 FIGUEROA BEFORE YOU SENT OUT YOUR E-MAIL ON MARCH 26,
15 CORRECT?

16 THE COURT: DO YOU UNDERSTAND?

17 MS. OLIVER: OBJECTION AS TO THIS ISSUE.
18 IT'S VAGUE, YOUR HONOR.

19 THE COURT: YES. GO BACK A COUPLE OF
20 STEPS, PLEASE.

21 BY MS. BARCLAY:

22 Q. BEFORE YOU SENT OUT YOUR E-MAIL ON MARCH 26, DID
23 YOU DISCUSS THAT E-MAIL WITH COMMISSIONER FIGUEROA?

24 THE COURT: THE ONE THAT SHE WAS GOING TO
25 SEND OUT ON MARCH 26?

1 MS. BARCLAY: YES.

2 BY MS. BARCLAY:

3 Q. SO THE E-MAIL THAT YOU WERE GOING TO SEND OUT ON
4 MARCH 26, DID YOU DISCUSS THAT WITH COMMISSIONER
5 FIGUEROA?

6 A. YES.

7 Q. AND DID YOU UNDERSTAND THAT COMMISSIONER
8 FIGUEROA HAD BEEN NOTIFIED THAT CATHOLIC SOCIAL SERVICES
9 RECEIVED A REFERRAL FROM A CHILD ON MARCH 24?

10 MS. OLIVER: OBJECTION. YOUR HONOR, LACK
11 OF FOUNDATION.

12 THE COURT: WELL, OVERRULED.

13 IF YOU KNOW.

14 THE WITNESS: CAN I TELL YOU WHAT -- I
15 DON'T KNOW THE SPECIFICS IN TERMS OF A CHILD THAT WAS
16 SPOKEN ABOUT. I DO KNOW THAT -- THE SITUATION I KNEW OF
17 WAS ANOTHER PROVIDER AGENCY -- IF I CAN SAY THE AGENCY
18 WAS BETHANY -- ACCEPTED, WAS GOING TO ACCEPT THE
19 REFERRAL FROM ANOTHER FOSTER CARE AGENCY. AS I
20 TESTIFIED, FOSTER CARE AGENCIES CANNOT REFER OUTSIDE OF
21 THEIR PARTICULAR ORGANIZATION. THEREFORE, THIS E-MAIL
22 WAS SENT OUT BECAUSE OF THAT.

23 BY MS. BARCLAY:

24 Q. I WANT TO TAKE YOU TO THE EVENING OF MAY 25,
25 2018. YOU COMMUNICATED WITH JIM BLACK REGARDING DOE

1 FOSTER CHILD PLACEMENT, CORRECT?

2 A. YES.

3 Q. AND YOU WEREN'T THERE, AT DHS --

4 MS. OLIVER: OBJECTION, YOUR HONOR. THIS
5 LINE OF QUESTIONING IS BEYOND THE SCOPE OF DIRECT.

6 MS. BARCLAY: THIS LINE OF QUESTIONING IS
7 RELEVANT TO THE ASSERTION BY DHS THAT WAS MADE ON DIRECT
8 AS FAR AS THEIR ENSURING THAT PLACEMENTS WILL STILL BE
9 MADE IN THE BEST INTEREST OF CHILDREN, AND THAT BEING A
10 PRIORITY FOR THEM, YOUR HONOR.

11 THE COURT: I'M GOING TO SUSTAIN THE
12 OBJECTION. BUT I'M ALSO GOING TO RECESS. UNTIL
13 TOMORROW. AT 1 O'CLOCK.

14 MS. BARCLAY: THANK YOU, YOUR HONOR.

15 (ALL RISE.)

16

17 I N D E X.

18 WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
19 TONI SIMMS-BUSCH	34	53	56	-
20 CECILIA PAUL	58	-	-	-
21 SHARONELL FULTON	64	70	-	-
22 KIMBERLY ALI	74	97	-	-

23

24

25

1 I CERTIFY THAT THE FOREGOING IS A CORRECT
2 TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE
3 ABOVE-ENTITLED MATTER.

4

5

6 DATE OFFICIAL COURT REPORTER

7 LYNN MCCLOSKEY, RPR

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2 EASTERN DISTRICT OF PENNSYLVANIA

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4 SHARONELL FULTON, ET AL : CIVIL DOCKET FOR CASE
: NO. 18-2075

5 -VS- :

6 CITY OF PHILADELPHIA, ET AL :
:

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8 PHILADELPHIA, PA.

9 JUNE 19, 2018

10 BEFORE HONORABLE JUDGE PETRESE B. TUCKER

11 TEMPORARY RESTRAINING ORDER

12 DAY 2

13 APPEARANCES:

14 FOR THE PLAINTIFF: BECKET FUND FOR RELIGIOUS LIBERTY
BY: LORI H. WINDHAM, ESQ.
15 MARK L. RIENZI, ESQ.
STEPHANIE H. BARCLAY, ESQ.
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17 WASHINGTON, DC 20036

18 FOR THE DEFENDANTS: CITY OF PHILADELPHIA LAW DEPARTMENT
BY: ELEANOR N. EWING, ESQ.
19 BENJAMIN H. FIELD, ESQ.
SCHAUNDRA OLIVER, ESQ.
20 1515 ARCH STREET, 16TH FLOOR
PHILADELPHIA, PA 19102

21
22 LYNN MCCLOSKEY, RPR
23 OFFICIAL COURT REPORTER
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1 **FOR THE DEFENDANTS: MARSHALL DENNEHEY WARNER COLEMAN &**
2 **GOGGIN**
3 **BY: DIANA P. CORTES, ESQ.**
4 **2000 MARKET STREET, SUITE 2300**
5 **PHILADELPHIA, PA 19103**

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1 THE COURT: GOOD AFTERNOON.

2 ALL COUNSEL: GOOD AFTERNOON, YOUR HONOR.

3 THE COURT: YOU MAY BE SEATED.

4 CAN THE WITNESS TAKE THE STAND, MS. ALI.

5 (MS. ALI RETAKES THE STAND.)

6 THE COURT: OKAY. YOU MAY CONTINUE.

7 MS. BARCLAY: THANK YOU, YOUR HONOR.

8 CONTINUED CROSS EXAMINATION

9 BY MS. BARCLAY:

10 Q. MS. ALI, YOU REMEMBER THAT YOU GAVE TESTIMONY
11 YESTERDAY?

12 A. YES.

13 Q. AND IS THERE ANY OF THAT TESTIMONY YOU WANT TO
14 CHANGE AT THIS POINT?

15 A. NO.

16 Q. YOU STILL STAND BY YESTERDAY'S TESTIMONY?

17 A. YES.

18 Q. AND DO YOU UNDERSTAND THAT YOU ARE STILL UNDER
19 OATH TODAY?

20 A. YES.

21 Q. YOU REPORT TO COMMISSIONER FIGUEROA, CORRECT?

22 A. YES.

23 Q. YESTERDAY WE DISCUSSED AN E-MAIL THAT YOU SENT
24 ON MARCH 26TH.

25 A. YES.

1 Q. YOU CONSULTED WITH COMMISSIONER FIGUEROA BEFORE
2 SEEING THAT E-MAIL, CORRECT?

3 A. YES.

4 Q. ON MARCH 24 CATHOLIC NOTIFIED DHS THAT IT HAD
5 ACCEPTED A PLACEMENT TO REUNITE A CHILD WITH ITS
6 SIBLING. YOU DISCUSSED THAT SITUATION WITH COMMISSIONER
7 FIGUEROA, CORRECT?

8 A. I DISCUSSED FOUR CASES WITH COMMISSIONER
9 FIGUEROA OVER THE COURSE. I DON'T KNOW SPECIFICALLY IN
10 WHAT ORDER.

11 Q. I AM NOT ASKING WHICH ORDER. I JUST WANT TO
12 KNOW, IS IT CORRECT THAT YOU DID DISCUSS THIS CASE WITH
13 COMMISSIONER FIGUEROA?

14 A. CAN YOU CLARIFY WHAT "THIS CASE" IS.

15 Q. ON MARCH 24TH, CATHOLIC NOTIFIED DHS THAT IT HAD
16 ACCEPTED A PLACEMENT, AND I CAN TELL YOU THE NAME OF THE
17 CHILD, TO REUNITE THAT CHILD WITH ITS SIBLINGS. DO YOU
18 RECALL DISCUSSING THAT SITUATION WITH COMMISSIONER
19 FIGUEROA?

20 A. YES.

21 Q. DID YOU DISCUSS THAT ON MARCH 24TH?

22 A. I AM NOT SURE IF IT WAS ON MARCH THE 24TH.

23 Q. WOULD IT HAVE BEEN NEARLY THEREAFTER IF NOT ON
24 MARCH 24TH?

25 A. YES.

1 Q. ONE THING YOU TOLD ME YESTERDAY WAS THAT THE
2 REASON FOR YOUR MARCH 26 TO 27 E-MAIL TO CUA LEADERSHIP
3 WAS A NEED TO REITERATE THE RULE THAT NO AGENCIES SHOULD
4 BE MAKING REFERRALS, IS THAT CORRECT?

5 A. REFERRALS TO OUTSIDE AGENCIES, YES.

6 Q. YOUR E-MAIL ON MARCH 26 DOES NOT SAY THAT IN
7 THOSE TERMS. CORRECT?

8 A. CAN YOU SHOW ME A COPY OF THE E-MAIL.

9 Q. ABSOLUTELY.

10 MS. BARCLAY: PERMISSION TO APPROACH THE
11 WITNESS, YOUR HONOR.

12 THE COURT: YES.

13 BY MS. BARCLAY:

14 Q. MS. ALI, I AM APPROACHING YOU WITH WHAT HAS BEEN
15 MARKED AS PLAINTIFF'S EXHIBIT NUMBER 3.

16 YOUR E-MAIL DOES NOT JUST REITERATE A
17 GENERAL RULE THAT NO AGENCY SHOULD BE MAKING REFERRALS,
18 DOES IT?

19 A. NO.

20 Q. YOUR E-MAIL TARGETS JUST TWO AGENCIES, DOESN'T
21 IT?

22 MS. OLIVER: OBJECTION TO THE
23 CHARACTERIZATION OF "TARGET."

24 THE COURT: SUSTAINED.

25 BY MS. BARCLAY:

1 Q. YOUR AGENCY IS DISCUSSING JUST TWO AGENCIES.

2 YOUR E-MAIL IS DISCUSSING JUST TWO
3 AGENCIES, CORRECT?

4 A. TWO AGENCIES WITH AN INTAKE CLOSURE.

5 Q. SO IT'S CORRECT THAT YOUR E-MAIL IS JUST
6 DISCUSSING TWO AGENCIES WITH AN INTAKE CLOSURE?

7 A. YES.

8 Q. IN FACT, THE SUBJECT LINE OF YOUR E-MAIL SAYS:
9 INTAKE CLOSURE FOR BETHANY AND CATHOLIC SOCIAL SERVICES
10 FOSTER-CARE PROGRAM, CORRECT?

11 A. YES.

12 Q. YOU DIDN'T SEND ANOTHER E-MAIL TELLING CUA'S NOT
13 TO MAKE REFERRALS TO THE OTHER 28 AGENCIES, DID YOU?

14 A. I WOULD NOT HAVE DONE THAT.

15 Q. AND YOU DIDN'T DO THAT, RIGHT?

16 A. I WOULD NOT HAVE DONE THAT. BECAUSE CUA MAKES
17 REFERRALS.

18 Q. RIGHT. AND I AM TRYING TO CONFIRM YOU DID NOT
19 SEND ANOTHER E-MAIL REMINDING CUA NOT TO MAKE REFERRALS
20 TO ANY OTHER AGENCY BECAUSE CUA MAKES REFERRALS. YOU
21 DIDN'T SEND ANOTHER E-MAIL?

22 A. NO.

23 Q. YOU ASKED FOR CONFIRMATION THAT THE E-MAIL WAS
24 SENT TO ANYONE WHO COULD, QUOTE, GENERATE, APPROVE OR
25 SUBMIT A REFERRAL TO -- AND THEN CATHOLIC OR BETHANY ARE

1 THE TWO AGENCIES YOU ARE REFERRING TO, CORRECT?

2 A. MY E-MAIL DOES NOT SAY THAT.

3 Q. I APOLOGIZE. THAT'S THE E-MAIL OF MS. STACY
4 BOYD WHO REPORTS TO YOU, CORRECT? AND HER E-MAIL SAYS:
5 PROVIDE CONFIRMATION THAT THE E-MAIL WOULD BE SENT TO
6 ANYONE WHO WOULD, QUOTE, GENERATE, APPROVE OR SUBMIT A
7 REFERRAL TO CATHOLIC OR BETHANY, CORRECT?

8 A. YES.

9 Q. AND HER E-MAIL DOES NOT ASK ABOUT THAT SORT OF
10 CONFIRMATION FOR THE OTHER 28 AGENCIES, DOES IT?

11 A. SHE DIDN'T SEND THE E-MAIL TO THE OTHER 28
12 AGENCIES. HER E-MAIL JUST WENT TO CUA LEADERSHIP.

13 Q. BUT MY QUESTION IS WHEN SHE IS SAYING, PLEASE
14 REPLY SEPARATELY TO ME CONFIRMING THAT YOU HAVE SHARED
15 THIS INFORMATION TO THOSE THAT COULD POTENTIALLY
16 GENERATE, APPROVE OR SUBMIT A REFERRAL TO THESE
17 PROVIDERS, SHE IS REFERRING TO BETHANY AND CATHOLIC,
18 CORRECT?

19 MS. OLIVER: OBJECTION, YOUR HONOR.

20 THE COURT: OVERRULED.

21 THE WITNESS: REPEAT THE QUESTION. I AM NOT
22 SURE IF I UNDERSTAND IT.

23 BY MS. BARCLAY:

24 Q. LET ME READ YOU THE SENTENCE IN HER E-MAIL.

25 A. YES.

1 Q. SHE SAYS: PLEASE REPLY SEPARATELY TO ME
2 CONFIRMING THAT YOU HAVE SHARED THIS INFORMATION TO
3 THOSE THAT COULD POTENTIALLY GENERATE, APPROVE OR SUBMIT
4 A REFERRAL TO THESE PROVIDERS. AND I JUST WANT TO
5 CONFIRM THAT WHEN SHE SAYS "THESE PROVIDERS," SHE IS
6 REFERRING TO CATHOLIC AND BETHANY, CORRECT?

7 A. YES.

8 Q. AND SHE DID NOT SEND AN E-MAIL OR SAY IN THIS
9 E-MAIL THAT SHE NEEDED THAT SORT OF CONFIRMATION FOR
10 REFERRAL TO ANY OF THE OTHER 28 AGENCIES, DID SHE?

11 A. NO. THAT'S WHEN THE OTHER AGENCIES ARE OPEN,
12 THEIR INTAKE WAS NOT CLOSED.

13 Q. THANK YOU.

14 I WANT TO TAKE YOU TO THE EVENING OF MAY 25.
15 YOU RECEIVED TEXTS FROM JIM BLACK REGARDING DOE FOSTER CHILD
16 NUMBER 1.

17 A. CORRECT.

18 Q. AND YOU AND MR. BLACK COMMUNICATED ABOUT THIS
19 SITUATION?

20 A. VIA TEXT AS WELL AS TELEPHONE.

21 Q. BEYOND YOUR COMMUNICATION WITH MR. BLACK, DID
22 YOU RECEIVE ANY OTHER COMMUNICATION THAT EVENING ABOUT
23 DOE FOSTER CHILD?

24 A. YOU SAID BESIDES MR. BLACK?

25 Q. BESIDES MR. BLACK?

1 A. NO.

2 Q. SO YOUR DHS STAFF NEVER CALLED YOU THAT NIGHT
3 REGARDING DOE FOSTER CHILD'S PLACEMENT, DID THEY?

4 A. NO.

5 Q. AND YOU DIDN'T KNOW WHY STAFF DENIED THE
6 PLACEMENT WITH DOE FOSTER CHILD -- YOU DIDN'T THAT
7 NIGHT --

8 MS. OLIVER: OBJECTION, YOUR HONOR, BEYOND
9 THE SCOPE OF DIRECT.

10 THE COURT: OVERRULED.

11 THE WITNESS: REPEAT THE QUESTION. I'M
12 SORRY.

13 BY MS. BARCLAY:

14 Q. YOU DON'T KNOW WHY YOUR STAFF DENIED THE
15 PLACEMENT WITH DOE FOSTER CHILD'S FORMER FOSTER MOTHER.

16 A. I DON'T BECAUSE I HAVE NOT HAD A CONVERSATION
17 WITH THE STAFF.

18 Q. IT'S POSSIBLE THAT DHS STAFF DENIED THIS
19 REFERRAL SOLELY BECAUSE OF THE ONGOING CASE AND REFERRAL
20 FOR USE WITH CATHOLIC, ISN'T IT?

21 MS. OLIVER: OBJECTION, CALLS FOR
22 SPECULATION.

23 THE COURT: SUSTAINED.

24 BY MS. BARCLAY:

25 Q. IF DHS STAFF HAD DENIED THIS REFERRAL SOLELY

1 BECAUSE OF THE ONGOING CASE AND REFERRAL FOR USE WITH
2 CATHOLIC, WHAT WOULD BE YOUR POSITION ON THAT DENIAL BY
3 DHS STAFF?

4 MS. OLIVER: OBJECTION, CALLS FOR
5 SPECULATION.

6 THE COURT: SUSTAINED.

7 MS. BARCLAY: YOUR HONOR, I AM NOT ASKING IF
8 SHE KNOWS WHAT HER STAFF DID. I'M ASKING WHAT HER POSITION
9 WOULD BE ON THE DENIAL IF THAT WAS THE CIRCUMSTANCES OF THE
10 DENIAL.

11 THE COURT: THAT IS SPECULATIVE, SO I AM
12 GOING TO SUSTAIN THE OBJECTION.

13 BY MS. BARCLAY:

14 Q. DHS STAFF DID NOT COMMUNICATE TO YOU THAT NIGHT
15 THAT DOE FOSTER MOTHER WAS WILLING TO ADOPT DOE FOSTER
16 CHILD, DID THEY?

17 A. NO.

18 Q. IN FACT, YOUR PREVIOUS TESTIMONY IS THAT YOU
19 LEARNED THROUGH LITIGATION THAT THIS FOSTER MOTHER WAS
20 WILLING TO ADOPT?

21 A. THAT IS CORRECT.

22 Q. IF THIS SITUATION WERE NOT BROUGHT TO YOUR
23 ATTENTION BY CATHOLIC, YOU MAY HAVE NEVER LEARNED ABOUT
24 IT?

25 MS. OLIVER: OBJECTION.

1 THE COURT: SUSTAINED.

2 BY MS. BARCLAY:

3 Q. YOU HAVE NOT ASKED CUA TO REPORT TO YOU ABOUT
4 SIMILAR SITUATIONS, HAVE YOU?

5 MS. OLIVER: OBJECTION.

6 THE COURT: THAT HAS BEEN ASKED AND ANSWERED.
7 SUSTAINED.

8 BY MS. BARCLAY:

9 Q. YOU HAVE NOT ASKED YOUR OWN DHS STAFF TO REPORT
10 TO YOU ABOUT THIS SORT OF SITUATION IN THE FUTURE, HAVE
11 YOU?

12 THE COURT: WHAT SORT OF SITUATION?

13 MS. BARCLAY: THE DOE FOSTER CHILD SITUATION
14 WHERE THE DOE FOSTER MOTHER WAS WILLING TO ADOPT THE CHILD.

15 THE WITNESS: I AM NOT SURE WHAT THE QUESTION
16 IS. I'M SORRY, REPEAT IT AGAIN.

17 BY MS. BARCLAY:

18 Q. SINCE MAY 25, YOU HAVE NOT COMMUNICATED IN
19 WRITING TO DHS STAFF THAT THEY SHOULD NOTIFY YOU IF
20 THERE IS A POTENTIAL REFERRAL WITH A CHILD TO CATHOLIC
21 WHERE THAT CHILD WOULD BE REUNITED WITH A FAMILY WITH A
22 FORMER RELATIONSHIP?

23 A. NO.

24 Q. BUT THERE HAS BEEN SOME CONFUSION ON THE GROUND
25 FROM LOWER LEVEL DHS WORKERS ABOUT WHEN REFERRALS TO

1 CATHOLIC ARE ALLOWED, ISN'T IT?

2 MS. OLIVER: OBJECTION.

3 THE COURT: SUSTAINED.

4 MS. BARCLAY: YOUR HONOR, THIS IS A STATEMENT
5 IN THE BRIEF BY MS. ALI'S ATTORNEYS, SO I AM NOT SURE WHAT
6 THE OBJECTION IS. BUT I AM QUOTING FROM THEIR BRIEF.

7 THE COURT: I AM NOT SURE WHAT THE RELEVANCE
8 IS SO I AM GOING TO SUSTAIN THE OBJECTION.

9 MS. BARCLAY: MAY I EXPLAIN THE RELEVANCE OF
10 THIS STATEMENT, YOUR HONOR?

11 THE COURT: NO. LET'S MOVE ON.

12 BY MS. BARCLAY:

13 Q. YOU HAVE BEEN DOING FOSTER-CARE WORK FOR ABOUT
14 18 YEARS?

15 A. YES.

16 Q. WHAT MOTIVATED YOU TO DO THIS TYPE OF WORK?

17 A. MINISTRY.

18 Q. WHAT DO YOU MEAN BY "MINISTRY"?

19 A. WHAT I MEAN BY MINISTRY IS WHEN I WORK AS AN
20 SOCIAL WORKER IS -- I BELIEVE IS A CALLING SO I DO IT
21 BECAUSE OF MINISTRY AND I ALSO DO IT BECAUSE OF MY
22 EDUCATIONAL BACKGROUND TO HELP PEOPLE.

23 Q. WELL, FIRST, LET ME SAY THANK YOU FOR YOUR
24 MINISTRY AND YOUR SERVICE TO THESE CHILDREN AND I DO
25 THINK THAT IS VERY ADMIRABLE. IS IT SAFE TO SAY YOU ARE

1 NOT IN THIS LINE OF WORK FOR THE MONEY?

2 A. ABSOLUTELY. YES, IT IS SAFE TO SAY THAT.

3 Q. I THOUGHT THAT MIGHT BE A FAIR ASSUMPTION.

4 SO YOU DON'T THINK OF FOSTER-CARE WORK AS
5 A BUSINESS, DO YOU?

6 MS. OLIVER: OBJECTION.

7 THE COURT: SUSTAINED.

8 BY MS. BARCLAY:

9 Q. DO YOU CONSIDER FOSTER-CARE TO BE SOMETHING THAT
10 IS OFFERED AS A BUSINESS?

11 MS. OLIVER: OBJECTION.

12 MS. BARCLAY: I AM STILL NOT SURE WHAT THE
13 OBJECTION IS, YOUR HONOR.

14 THE COURT: I AM GOING TO SUSTAIN THE
15 OBJECTION.

16 BY MS. BARCLAY:

17 Q. DO YOU THINK FOSTER-CARE AGENCIES ARE
18 BUSINESSES?

19 MS. OLIVER: OBJECTION, RELEVANCE, YOUR
20 HONOR.

21 MS. BARCLAY: THE RELEVANCE IS, YOUR HONOR,
22 THAT IN OPENING ARGUMENT THAT MS. ALI'S ATTORNEY SPENT SOME
23 OF HIS TIME DESCRIBING FOSTER-CARE AGENCIES AS BUSINESSES,
24 AND I WANT TO UNDERSTAND IF THAT IS A POSITION THAT MS. ALI
25 ALSO TAKES. THIS IS AN ISSUE THAT THE ATTORNEYS FOR MS. ALI

1 HAVE MADE RELEVANT IN THIS LITIGATION.

2 MS. OLIVER: YOUR HONOR, I OBJECT ON THE
3 GROUNDS THAT THAT'S A LEGAL ISSUE.

4 MS. BARCLAY: WHETHER OR NOT A FOSTER-CARE
5 BUSINESS -- A FOSTER CASE AGENCY IS A BUSINESS IS NOT A
6 LEGAL ISSUE. THAT'S A FACTUAL QUESTION.

7 THE COURT: BUT I DON'T KNOW WHETHER SHE IS
8 IN A POSITION TO ANSWER THAT. ANYTHING SHE WOULD SAY WOULD
9 BE HER OPINION, AND THAT'S NOT RELEVANT TO THESE
10 PROCEEDINGS.

11 BY MS. BARCLAY:

12 Q. HAVE YOU EVER PERSONALLY REFERRED TO FOSTER-CARE
13 AGENCIES AS BUSINESSES?

14 A. NO.

15 Q. YOU KNOW THAT CATHOLIC IS A NONPROFIT
16 ORGANIZATION, RIGHT?

17 A. YES.

18 Q. ARE YOU AWARE THAT CATHOLIC ACTUALLY LOSES MONEY
19 PROVIDING FOSTER-CARE SERVICES?

20 MS. OLIVER: OBJECTION.

21 THE COURT: OVERRULED, IF SHE IS AWARE.

22 THE WITNESS: I DON'T KNOW.

23 BY MS. BARCLAY:

24 Q. ARE YOU AWARE THAT CATHOLIC PROVIDES THESE
25 SERVICES AS PART OF THEIR RELIGIOUS MISSION?

1 A. I AM NOT SURE.

2 Q. SO YOU SAID YOU HAVE NEVER REFERRED TO --
3 PERSONALLY REFERRED TO FOSTER-CARE AS A BUSINESS. I
4 JUST WANT TO CONFIRM, YOU HAVE ALSO NEVER REFERRED TO
5 CATHOLIC SOCIAL SERVICES AS A BUSINESS, HAVE YOU?

6 MS. OLIVER: OBJECTION.

7 THE COURT: SUSTAINED.

8 BY MS. BARCLAY:

9 Q. YOU ARE FAMILIAR WITH POLICIES AND PROCEDURES
10 GOVERNING FOSTER-CARE, CORRECT?

11 A. YES.

12 Q. AND YOU'RE FAMILIAR WITH POLICIES AND LEGAL
13 REQUIREMENTS THAT AGENCIES HAVE TO COMPLY WITH IN ORDER
14 TO BE A PROVIDER IN PHILADELPHIA?

15 A. I AM FAMILIAR WITH POLICIES AND REGULATIONS. I
16 WOULD NOT SAY THAT I AM FAMILIAR WITH ALL OF THE LEGAL.

17 Q. IS IT YOUR POSITION -- WHAT WAS THE BASIS FOR
18 THE REFERRAL FREEZE TO CATHOLIC SOCIAL SERVICES?

19 A. SO THE BASIS OF THE REFERRAL FREEZE OR THE
20 INTAKE CLOSURE TO CATHOLIC COMMUNITY SERVICES IS BECAUSE
21 CATHOLIC COMMUNITY SERVICES REFUSED TO CERTIFY FOSTER
22 PARENTS OR PROVIDE AN ADOPTION HOME STUDY FOR FOSTER
23 PARENTS WHO WERE IN A SAME-SEX UNION.

24 Q. AND WHAT WAS THE EXPLANATION FOR THE DHS POLICY
25 THAT THAT VIOLATED WHEN YOU COMMUNICATED THAT REFERRAL

1 FOR USE TO CATHOLIC?

2 A. ACCORDING TO OUR ATTORNEYS, IT WAS FAIR
3 PRACTICE.

4 Q. THE FAIR PRACTICE ORDINANCE, MEANING WHAT?

5 A. I DON'T KNOW ALL THE DETAILS.

6 Q. DO YOU THINK FOSTER-CARE IS A PUBLIC
7 ACCOMMODATION?

8 A. I CAN'T ANSWER THAT QUESTION.

9 MS. OLIVER: OBJECTION.

10 THE COURT: SHE SAID SHE CAN'T ANSWER IT.

11 BY MS. BARCLAY:

12 Q. YESTERDAY I THINK I UNDERSTOOD YOUR TESTIMONY TO
13 BE, AND CORRECT ME IF I'M NOT GETTING THIS RIGHT, THAT I
14 THINK I UNDERSTOOD YOUR TESTIMONY TO BE THAT IF A
15 QUALIFIED FOSTER FAMILY WANTED TO RECEIVE A HOME STUDY
16 FROM A PARTICULAR AGENCY, THEN THAT AGENCY WOULD HAVE TO
17 PROVIDE THE HOME STUDY?

18 A. I'M SORRY. REPEAT IT AGAIN.

19 Q. YESTERDAY I UNDERSTOOD YOUR TESTIMONY TO BE THAT
20 UNDER DHS POLICY IF A QUALIFIED FOSTER FAMILY WANTED TO
21 RECEIVE A HOME STUDY FROM A FOSTER AGENCY, THEN THAT
22 PARTICULAR FOSTER AGENCY WOULD HAVE TO PROVIDE IT. THEY
23 COULD NOT TURN THAT FAMILY AWAY?

24 A. UNLESS IT WAS THE FAMILY'S CHOICE, YES.

25 Q. SO PRESUMABLY THIS IS AN IMPORTANT POLICY FOR

1 DHS?

2 A. YES.

3 Q. AND THIS IS A POLICY THAT YOU HAVE A COMPELLING
4 INTEREST IN ENFORCING, CORRECT?

5 THE COURT: WHAT DO YOU MEAN BY "COMPELLING"?
6 BY MS. BARCLAY:

7 Q. THIS IS A POLICY THAT YOU HAVE A STRONG INTEREST
8 IN ENFORCING, CORRECT?

9 A. I WOULD SAY INTEREST IN ENFORCING.

10 Q. YOU HAVE AN INTEREST IN ENFORCING THIS POLICY.

11 A. YES.

12 Q. NOT A STRONG INTEREST?

13 A. I HAVE AN INTEREST IN ENFORCING ALL POLICY.
14 WHETHER IT'S STRONG OR WEAK, I CANNOT SAY THAT.

15 Q. OKAY. SO YOU HAVE AN INTEREST THAT IS NO
16 STRONGER OR NO WEAKER THAN ENFORCING ANY OTHER POLICY?

17 A. YES.

18 Q. AND WHEN DID YOU FIRST PUT THIS PARTICULAR
19 POLICY IN WRITING?

20 A. WHAT PARTICULAR POLICY?

21 MS. OLIVER: OBJECTION.

22 MS. BARCLAY: I AM NOT SURE WHAT THE
23 OBJECTION IS, YOUR HONOR.

24 THE COURT: I WAS GOING TO READY TO ASK YOU
25 WHAT POLICY.

1 MS. BARCLAY: THE POLICY I JUST DESCRIBED TO
2 HER FROM YESTERDAY'S TESTIMONY THAT SHE AGREED TO, WHICH IS
3 THAT IF A QUALIFIED FOSTER FAMILY WANTED TO RECEIVE A HOME
4 STUDY FROM A PARTICULAR AGENCY AND THAT WAS THE FAMILY'S
5 CHOICE, THEN THAT AGENCY WOULD NEED TO PROVIDE THAT HOME
6 STUDY.

7 BY MS. BARCLAY:

8 Q. I AM TRYING TO UNDERSTAND, MS. ALI, WHEN DID YOU
9 FIRST PUT THAT POLICY IN WRITING?

10 MS. OLIVER: OBJECTION, YOUR HONOR. ASSUMING
11 FACTS NOT IN EVIDENCE.

12 MS. BARCLAY: I AM JUST BASING ON HER OWN
13 TESTIMONY, YOUR HONOR, THAT IS IN EVIDENCE.

14 THE COURT: WHEN YOU SAY "IN WRITING," I
15 DON'T KNOW THAT IT'S BEEN PLACED IN WRITING.

16 BY MS. BARCLAY:

17 Q. OKAY. HAVE YOU EVER PUT THIS POLICY IN WRITING?

18 A. IT IS MY UNDERSTANDING OF THE CONTRACT, SO ME
19 PERSONALLY, NO, I DON'T PUT CONTRACTS IN WRITING OR
20 POLICIES IN WRITING. THOSE ARE DONE BY A SEPARATE
21 DEPARTMENT.

22 Q. GREAT. SO YOUR UNDERSTANDING IS THAT THIS
23 POLICY -- THE PLACE WHERE IT IS WRITTEN DOWN EXCLUSIVELY
24 COMES FROM THE FOSTER-CARE CONTRACT?

25 THE COURT: EXCLUSIVELY? SHE DIDN'T SAY

1 THAT .

2 MS. BARCLAY: I AM JUST CONFIRMING IF THAT IS
3 TRUE .

4 THE WITNESS: I WAS GOING TO SAY THE SAME
5 THING, AS EXCLUSIVELY .

6 THE COURT: YES .

7 BY MS. BARCLAY:

8 Q. IS THERE ANOTHER SPOT YOU'RE AWARE, OTHER THAN
9 THE CONTRACT, WHERE THIS POLICY IS WRITTEN DOWN?

10 A. I AM NOT SURE .

11 Q. SO YOU ARE NOT AWARE, RIGHT, AT THIS TIME OF
12 ANOTHER SPOT WHERE IT IS WRITTEN DOWN?

13 MS. OLIVER: OBJECTION, ASKED AND ANSWERED .
14 THE WITNESS IS NOT SURE .

15 THE COURT: OVERRULED. SHE CAN ANSWER .

16 THE WITNESS: I SAID I AM NOT SURE .

17 BY MS. BARCLAY:

18 Q. THANK YOU. AND I AM JUST TRYING TO CLARIFY AT
19 THIS TIME YOU ARE NOT AWARE OF ANYWHERE ELSE WHERE THIS
20 POLICY IS WRITTEN DOWN. THAT'S JUST A YES OR NO
21 QUESTION .

22 THE COURT: SHE IS NOT SURE .

23 MS. BARCLAY: OKAY .

24 BY MS. BARCLAY:

25 Q. HOW HAVE YOU COMMUNICATED THIS PARTICULAR POLICY

1 TO FOSTER AGENCIES?

2 A. I HAVE NOT. IT'S IN THE CONTRACT.

3 Q. OKAY. SO THE CONTRACT IS THE MAIN WAY IN WHICH
4 YOU COMMUNICATE THIS WITH THE AGENCIES?

5 A. YES.

6 Q. AND HOW DO YOU COMMUNICATE TO FOSTER AGENCIES,
7 IF AT ALL, WHETHER OR NOT THEY ARE REQUIRED TO COMPLY
8 WITH PUBLIC ACCOMMODATION REQUIREMENTS?

9 A. I HAVE NOT.

10 Q. OKAY. YOU HAVE BEEN DOING THIS WORK FOR
11 18 YEARS?

12 A. YES.

13 Q. HAVE YOU EVER HAD CONVERSATIONS WITH ANYONE
14 ABOUT DHS'S OWN OBLIGATIONS FOR PROVIDING A PUBLIC
15 ACCOMMODATION REGARDING FOSTER-CARE SERVICES UNDER THE
16 FAIR PRACTICES ORDINANCE?

17 MS. OLIVER: OBJECTION.

18 THE COURT: OVERRULED.

19 THE WITNESS: REPEAT IT, PLEASE.

20 BY MS. BARCLAY:

21 Q. HAVE YOU EVER HAD CONVERSATIONS WITH ANYONE
22 ABOUT DHS'S OWN OBLIGATIONS PROVIDING A PUBLIC
23 ACCOMMODATION WITH RESPECT TO FOSTER-CARE SERVICES UNDER
24 THE FAIR PRACTICES ORDINANCE?

25 A. OTHER THAN IN THIS SITUATION?

1 Q. YES, OTHER THAN IN THIS SITUATION.

2 A. NO.

3 Q. AND IN THIS SITUATION, HAVE YOU HAD
4 CONVERSATIONS ABOUT YOUR OWN REQUIREMENTS AND DHS'S OWN
5 OBLIGATIONS TO PROVIDE PUBLIC ACCOMMODATION SERVICES
6 WITH RESPECT TO FOSTER-CARE?

7 A. NO.

8 Q. HAVE YOU -- SO YOU HAVE NEVER TRAINED STAFF
9 ABOUT THAT ISSUE EITHER?

10 A. NO.

11 Q. THANK YOU.

12 YOU STATE IN YOUR DECLARATION THAT A
13 SITUATION IN WHICH A FOSTER AGENCY SHUT DOWN -- OR EXCUSE
14 ME.

15 YOU DESCRIBED IN YOUR DECLARATION A SITUATION
16 IN WHICH A FOSTER AGENCY SHUT DOWN AND THE CHILDREN NEEDED
17 TO BE TRANSFERRED, CORRECT?

18 A. YES.

19 Q. YOU STATED THAT, QUOTE, THE GOAL IS TO KEEP
20 CHILDREN IN THE SAME HOME AND NOT DISRUPT THE CHILDREN
21 AND THEIR CARE, END QUOTE. CORRECT?

22 A. YES.

23 Q. AND THAT WAS THE GOAL BECAUSE MOVING CHILDREN
24 FROM ONE HOME TO ANOTHER CAN BE TRAUMATIC?

25 A. ABSOLUTELY.

1 Q. AND IN GENERAL, MOVING CHILDREN BETWEEN ANY
2 SORTS OF PLACEMENTS CAN COMPOUND THEIR TRAUMA?

3 A. IT DEPENDS.

4 Q. IS IT A POSSIBILITY THAT MOVING CHILDREN BETWEEN
5 PLACEMENTS COMPOUNDS THEIR TRAUMA?

6 A. IT'S A POSSIBILITY.

7 Q. IN YOUR EXPERIENCE AND YOUR YEARS OF DOING IT,
8 IS IT A LIKELY POSSIBILITY THAT CHILDREN WILL EXPERIENCE
9 TRAUMA FROM MOVING FROM ONE PLACEMENT TO ANOTHER AND
10 LOSING THE FAMILIARITY OF THE PAST PLACEMENT?

11 A. NOT NECESSARILY. DEPENDS ON THE SITUATION.

12 Q. YOUR GOAL WAS TO KEEP CHILDREN IN THEIR SAME
13 HOME SO THAT THEY COULD AVOID THAT SORT OF DISRUPTION,
14 CORRECT?

15 A. IN THAT PARTICULAR SITUATION WHEN -- THE
16 FOSTER-CARE SITUATION YOU ARE TALKING ABOUT?

17 Q. YES.

18 A. YES.

19 Q. AND YOU WERE TREATING IT AS IN THE BEST INTEREST
20 OF CHILDREN IN THAT SITUATION TO BE ABLE TO STAY WITH
21 THEIR SAME FOSTER PARENT?

22 A. YES.

23 Q. IF CATHOLIC WERE FORCED TO SHUT ITS PROGRAM
24 DOWN, YOU AGREE THAT CHILDREN AND FAMILIES WOULD NEED TO
25 BE TRANSITIONED TO ANOTHER AGENCY?

1 A. IT DEPENDS ON THE INDIVIDUAL CHILD.

2 Q. BUT IF CATHOLIC IS SHUT DOWN, THEN THE FAMILIES
3 AND CHILDREN THAT WERE PREVIOUSLY UNDER CATHOLIC'S CARE
4 HAVE TO BE MOVED TO THE CARE OF ANOTHER AGENCY, RIGHT?

5 A. NOT NECESSARILY, BECAUSE WE WILL LOOK AT WHETHER
6 OR NOT ANY OF THOSE CHILDREN OR YOUTH THAT ARE PLACED IN
7 THE CATHOLIC COMMUNITY -- CATHOLIC SOCIAL SERVICES,
8 EXCUSE ME, FOSTER HOME IF THEY ARE ABOUT TO ACHIEVE
9 PERMANENCY. SO IF THOSE YOUNG PEOPLE WERE GOING TO
10 EITHER BE REUNIFIED WITH THEIR FAMILY, IF THEY WERE
11 GOING TO BE ADOPTED, OR IF THEY WERE GOING TO ACHIEVE
12 PERMANENTLY THE CUSTODIANSHIP, THEN WE WOULD NOT WANT
13 THE FOSTER PARENT TO REMAIN -- AND THE CHILD TO REMAIN
14 WITH CATHOLIC COMMUNITY SERVICES. SO IT DEPENDS ON THE
15 -- AND WE WOULD LOOK AT EACH CHILD AND YOUTH
16 INDIVIDUALLY.

17 Q. SO SOME CHILDREN ARE GOING TO BE TO ABLE TO
18 ACHIEVE PERMANENCY OR MAYBE BE REUNITED, AND SO WOULD
19 NOT NEED TO BE A FOSTER CHILD ANY MORE. IS THAT RIGHT?

20 A. YES.

21 Q. FOR THE CHILDREN THAT NEEDED TO REMAIN FOSTER
22 CHILDREN BECAUSE THEY COULD NOT ACHIEVE THOSE GOALS, IS
23 IT CORRECT THAT THEY WOULD NEED TO BE TRANSITIONED TO
24 ANOTHER AGENCY?

25 A. YES.

1 Q. IF SOME PARENTS DID NOT CHOOSE TO TRANSITION TO
2 THE OTHER AGENCY, THEN THOSE CHILDREN WOULD HAVE TO BE
3 REMOVED FROM THAT FAMILY, CORRECT?

4 A. YES.

5 Q. AND THAT COULD POSSIBLY CAUSE TRAUMA FOR THOSE
6 CHILDREN, CORRECT?

7 A. YES.

8 MS. BARCLAY: NO FURTHER QUESTIONS, YOUR
9 HONOR.

10 THE COURT: OKAY. ANY REDIRECT?

11 MS. OLIVER: YES, YOUR HONOR.

12 GOOD AFTERNOON, YOUR HONOR.

13 THE COURT: GOOD AFTERNOON.

14 REDIRECT EXAMINATION

15 BY MS. OLIVER:

16 Q. MS. ALI, LET'S START WITH -- YOU PROVIDED
17 TESTIMONY ABOUT THE INTAKE CLOSURE AT CATHOLIC SOCIAL
18 SERVICES, AND YOU ALSO SAID THAT THERE WERE SOME
19 EXCEPTIONS, CORRECT?

20 A. YES.

21 Q. WILL YOU PLEASE INFORM THE COURT AS TO WHAT
22 TYPES OF EXCEPTIONS THERE ARE?

23 A. SO THE EXCEPTIONS THAT WE WILL MAKE IS THAT WE
24 WILL DETERMINE WHETHER OR NOT THAT CHILD HAD SIBLINGS
25 THAT WERE PLACED IN A PARTICULAR FOSTER HOME THROUGH

1 CATHOLIC COMMUNITY SERVICES AND WHETHER OR NOT THEIR
2 FOSTER PARENT WOULD BE WILLING TO ALLOW THE SIBLINGS TO
3 BE REUNITED IN THEIR FOSTER HOME. WE ALSO MAKE
4 EXCEPTIONS WHEN A CHILD OR YOUTH WAS PREVIOUSLY PLACED
5 IN A CATHOLIC COMMUNITY SERVICES FOSTER HOME, WE WOULD
6 WANT TO ASK THAT FOSTER PARENT WOULD THEY BE WILLING TO
7 RESUME AND ALLOW THE CHILD TO RETURN BACK TO THEIR HOME
8 FOR FOSTER-CARE.

9 Q. AND HOW WOULD THOSE EXCEPTIONS BECOME KNOWN?

10 A. THE EXCEPTIONS WOULD BECOME KNOWN TO MYSELF OR
11 COMMISSIONER FIGUEROA BY WAY OF THE CUA LEADERSHIP.
12 THEY WOULD EITHER SEND AN E-MAIL, A TELEPHONE CALL, OR
13 EVEN A TEXT MESSAGE TO MYSELF OR COMMISSIONER FIGUEROA.

14 Q. AND SINCE THE INTAKE CLOSURE, HAS DHS IN FACT,
15 EITHER YOU OR THE COMMISSIONER, RECEIVED REQUESTS FROM
16 CATHOLIC SOCIAL SERVICES LEADERSHIP WITH RESPECT TO
17 EXCEPTIONS?

18 A. YES.

19 Q. AND HAVE ANY OF THOSE EXCEPTIONS BEEN GRANTED?

20 A. ALL OF THEM.

21 Q. AND HOW MANY HAVE THERE BEEN?

22 A. A TOTAL OF FOUR.

23 Q. AND IN ADDITION TO THE EXCEPTIONS COMING TO YOUR
24 KNOWLEDGE BY WAY OF CATHOLIC LEADERSHIP, WOULD -- IS
25 THERE -- ARE THERE ANY INSTANCES WHERE DHS WOULD KNOW OF

1 SUCH EXCEPTIONS?

2 A. THERE ARE INSTANCES IN WHICH DHS WOULD KNOW OF
3 EXCEPTIONS.

4 Q. AND ARE YOU ABLE TO PROVIDE -- EXPLAIN TO THE
5 COURT HOW DHS WOULD KNOW?

6 A. IF THE INFORMATION WAS BROUGHT TO DHS BY WAY OF
7 A CUA CASE MANAGER OR A DHS SOCIAL WORKER, THEN THE DHS
8 SOCIAL WORKER WOULD ASK OR TRY TO DETERMINE WHETHER OR
9 NOT THEY CAN GET AN EXCEPTION TO THE RULE.

10 Q. AND AGAIN THE EXCEPTION IS PRESENTED TO YOU?

11 A. YES.

12 Q. ADDITIONALLY, TURNING YOUR ATTENTION TO FOSTER
13 -- PROSPECTIVE FOSTER PARENTS AND THEIR DESIRE TO WORK
14 WITH PARTICULAR AGENCIES. FIRST OF ALL, CAN FOSTER-CARE
15 AGENCIES -- DO YOU BELIEVE IT'S APPROPRIATE FOR
16 FOSTER-CARE AGENCIES TO INFORM PROSPECTIVE FOSTER
17 PARENTS ABOUT THE SERVICES THAT MAY BE OFFERED BY OTHER
18 FOSTER-CARE AGENCIES?

19 A. ONLY AT THE REQUEST OF THE FOSTER PARENT, THE
20 POTENTIAL FOSTER PARENT.

21 Q. AND DO YOU BELIEVE THAT -- I BELIEVE YOU HAVE
22 ALREADY TESTIFIED THAT FOSTER PARENTS -- IT'S THEIR
23 CHOICE TO CHOOSE WHICH AGENCY WITH WHICH THEY WOULD LIKE
24 TO WORK?

25 A. YES.

1 Q. DO YOU ALSO BELIEVE IT'S APPROPRIATE FOR A
2 FOSTER-CARE AGENCY TO REFUSE TO EVALUATE A FAMILY?

3 A. NO.

4 MS. OLIVER: YOUR HONOR, I HAVE NO FURTHER
5 QUESTIONS OF MS. ALI.

6 THE COURT: ALL RIGHT. ANY OTHER QUESTIONS?

7 MS. BARCLAY: YES, YOUR HONOR, BUT I WILL BE
8 BRIEF.

9 RECROSS EXAMINATION

10 BY MS. BARCLAY:

11 Q. YOU JUST SPOKE ABOUT EXCEPTIONS TO THE REFERRAL
12 FREEZE, AND I BELIEVE YOU SAID FOR REUNITING SIBLINGS OR
13 FOR FAMILIES WITH PREEXISTING RELATIONSHIPS. DID I GET
14 THAT RIGHT?

15 A. YES.

16 Q. ANY OTHER BASIS FOR AN EXCEPTION?

17 A. IT COULD BE. I CAN'T THINK OF ANY OFFHAND.

18 Q. SURE.

19 A. THE MOST IMPORTANT THING WE WOULD DO IS -- I
20 WOULD DO IS HAVE A CONVERSATION WITH THE CUA LEADERSHIP
21 TO DETERMINE WHY AN EXCEPTION SHOULD BE GRANTED.

22 Q. WHEN WAS THE FIRST TIME YOU COMMUNICATED THIS
23 POLICY OF GRANTING EXCEPTIONS?

24 A. I DIDN'T COMMUNICATE THIS. COMMISSIONER
25 FIGUEROA COMMUNICATED THAT TO CATHOLIC COMMUNITY

1 SERVICES -- CATHOLIC SOCIAL SERVICES.

2 Q. WHEN IS YOUR UNDERSTANDING THAT THAT WAS
3 COMMUNICATED?

4 A. AROUND THE TIME THE INTAKE WAS CLOSED.

5 Q. WHEN INTAKE WAS CLOSED, THAT'S YOUR
6 UNDERSTANDING?

7 A. ON OR ABOUT.

8 Q. AND WHEN WAS THAT POLICY GRANTING EXCEPTIONS
9 COMMUNICATED -- WELL, LET ME BACK UP A LITTLE BIT. YOU
10 SAID THAT ONE OF THE WAYS THAT THESE SITUATIONS WILL
11 BECOME KNOWN TO YOU IS THROUGH CUA LEADERSHIP?

12 A. YES.

13 Q. AND IT'S POSSIBLE THAT IF CUA LEADERSHIP DOES
14 NOT NOTIFY YOU, YOU WON'T KNOW ABOUT THE NEED TO GRANT
15 AN EXCEPTION?

16 A. THAT'S POSSIBLE.

17 Q. AND YOU HAVE NOT REQUESTED CUA LEADERSHIP TO
18 BRING ANY OF THESE SITUATIONS TO YOUR ATTENTION, HAVE
19 YOU?

20 A. I HAVE.

21 Q. HAVE YOU REQUESTED IN WRITING THAT ALL CUA
22 LEADERSHIP BRING TO YOUR ATTENTION SITUATIONS WHERE A
23 REFERRAL MAY NEED TO BE MADE TO CATHOLIC TO REUNITE
24 SIBLINGS OR FAMILIES WITH PREEXISTING RELATIONSHIP?

25 A. I HAVE NOT TO ALL CUA LEADERSHIP. HOWEVER, IN

1 CONVERSATIONS WITH JIM AMATO AND JIM BLACK, I ALWAYS SAY
2 IF THERE IS ANY ADDITIONAL, IF THERE IS ANY OTHER CASES
3 THAT I NEED TO CONSIDER, JUST LET ME KNOW.

4 Q. BUT YOU HAVE NOT COMMUNICATED THIS TO LEADERS OF
5 OTHER CUA'S, HAVE YOU?

6 MS. OLIVER: OBJECTION.

7 THE COURT: SUSTAINED.

8 MS. BARCLAY: YOUR HONOR, MAY I UNDERSTAND
9 THE BASIS FOR THE OBJECTION?

10 THE COURT: SUSTAINED.

11 BY MS. BARCLAY:

12 Q. YOU SAID THAT THERE HYPOTHETICALLY COULD BE
13 INSTANCES WHERE DHS STAFF WOULD BRING THESE SORTS OF
14 SITUATIONS TO YOUR ATTENTION?

15 A. IT COULD BE.

16 Q. BUT THAT'S NEVER ACTUALLY HAPPENED SO FAR, HAS
17 IT?

18 A. NOT FOR CATHOLIC, BUT FOR OTHER SITUATIONS, YES.

19 Q. SINCE THIS LITIGATION HAS STARTED, DHS HAS NOT
20 BROUGHT TO YOUR ATTENTION ANY NEEDS FOR AN EXCEPTION
21 BASED ON THIS POLICY YOU DESCRIBED, CORRECT?

22 A. YES, THEY HAVE.

23 Q. IN WHAT INSTANCES HAVE DHS STAFF BROUGHT TO YOUR
24 ATTENTION THE NEED TO GRANT AN EXCEPTION?

25 A. SO WE CURRENTLY HAVE A GROUP HOME PROVIDER IN

1 WHICH THEIR INTAKE IS CLOSED. IT WAS A YOUNG PERSON WHO
2 WAS PLACED AT THAT GROUP HOME PREVIOUSLY. I GRANTED THE
3 EXCEPTION FOR THAT YOUNG PERSON TO BE PLACED BACK AT
4 THAT GROUP HOME.

5 Q. DHS STAFF HAS NEVER BROUGHT TO YOUR ATTENTION
6 SITUATIONS WHERE A CHILD NEEDED TO BE REFERRED TO
7 CATHOLIC, HAVE THEY?

8 MS. OLIVER: OBJECTION, ASKED AND ANSWERED,
9 YOUR HONOR.

10 MS. BARCLAY: THIS IS NOT SOMETHING THAT SHE
11 ANSWERED YET, YOUR HONOR. I AM ASKING SPECIFICALLY --

12 THE COURT: ASK IT AGAIN BECAUSE I THOUGHT IT
13 HAD BEEN ASKED AND ANSWERED.

14 BY MS. BARCLAY:

15 Q. DHS STAFF, SINCE THE BEGINNING OF THIS
16 LITIGATION, HAS NOT BROUGHT TO YOUR ATTENTION A
17 SITUATION WHERE IT WOULD BE IN THE BEST INTEREST OF THE
18 CHILD TO BE REFERRED TO CATHOLIC SOCIAL SERVICES?

19 A. NO.

20 Q. YOU SAID THAT -- WHEN ASKED WOULD IT BE
21 APPROPRIATE FOR A FOSTER AGENCY TO INFORM A FAMILY ABOUT
22 OTHER SERVICES OFFERED, YOU SAID ONLY AT THE REQUEST OF
23 THAT FOSTER PARENT, CORRECT?

24 A. YES.

25 Q. SO IT WOULD BE INAPPROPRIATE FOR AN AGENCY TO

1 NOTIFY A FAMILY ABOUT, FOR EXAMPLE, LANGUAGE SERVICES OF
2 ANOTHER AGENCY IF THE FOSTER FAMILY DID NOT SPECIFICALLY
3 ASK ABOUT THAT?

4 A. YES. I WOULD EXPECT THAT FOSTER-CARE AGENCY TO
5 TELL THEM WHAT TYPE OF SERVICES THEY OFFER AT THEIR
6 PARTICULAR AGENCY, KNOWING THAT OUR CHILDREN ARE
7 ASSIGNED TO AND FAMILIES ARE ASSIGNED TO ALL TEN CUA'S,
8 SO THE --

9 Q. I AM NOT TALKING ABOUT CUA'S. I'M TALKING ABOUT
10 FOSTER AGENCIES.

11 A. IN ALL FOSTER-CARE AGENCIES. SO WE WOULD EXPECT
12 THE FOSTER-CARE AGENCY TO BE ABLE TO PROVIDE LANGUAGE
13 SERVICES TO CHILDREN OR YOUTH WHO ARE PLACED IN THEIR
14 FOSTER-CARE AS WELL AS THE PARENTS.

15 Q. IS IT A REQUIREMENT OF THE CONTRACT THAT ALL
16 FOSTER AGENCIES PROVIDE LANGUAGE SERVICES?

17 A. I AM UNSURE.

18 Q. SO A FOSTER AGENCY WOULD NEED TO FIRST LET A
19 FAMILY KNOW ABOUT ANY LANGUAGE SERVICES, IF ANY, THAT
20 THAT FOSTER AGENCY ITSELF OFFERED, RIGHT?

21 A. IF THAT WAS THE QUESTION.

22 Q. WELL, IF A FAMILY -- SAY A LATINO FAMILY
23 APPROACHED AN AGENCY, THAT FOSTER AGENCY WOULD,
24 ACCORDING TO YOU, FIRST NEED TO NOTIFY THE LATINO FAMILY
25 ABOUT ANY LANGUAGE SERVICES THAT FOSTER AGENCY PROVIDED,

1 CORRECT?

2 A. YES.

3 Q. AND THE AGENCY COULD NOT NOTIFY THEM ABOUT
4 SERVICES OFFERED BY OTHER AGENCIES UNLESS THE FAMILY
5 SPECIFICALLY ASKED FOR INFORMATION ABOUT OTHER AGENCIES?

6 MS. OLIVER: OBJECTION.

7 THE COURT: SUSTAINED. I THINK WE HAVE GONE
8 FAR AFIELD TO THE RECROSS.

9 BY MS. BARCLAY:

10 Q. YOU SPOKE IN YOUR TESTIMONY ABOUT THE IMPORTANCE
11 OF LETTING FAMILIES CHOOSE THE AGENCY THAT THEY WANT TO
12 WORK WITH, CORRECT?

13 A. YES.

14 Q. AND DO YOU BELIEVE THAT IT'S ALSO IMPORTANT FOR
15 MRS. PAUL AND MS. FULTON AND MS. TONI SIMMS-BUSCH TO BE
16 ABLE TO CHOOSE THE AGENCY THEY WANT TO WORK WITH?

17 A. YES.

18 MS. BARCLAY: THANK YOU. NO FURTHER
19 QUESTIONS.

20 THE COURT:

21 MS. OLIVER: YOUR HONOR, I HAVE NO REDIRECT.
22 HOWEVER, I'D ASK TO RESERVE THE RIGHT TO RECALL MS. ALI
23 AFTER THE PLAINTIFFS REST.

24 THE COURT: YES.

25 YOU MAY STEP DOWN.

1 THE WITNESS: THANK YOU.

2 (WITNESS EXCUSED.)

3 THE COURT: YOU MAY CALL YOUR WITNESS.

4 MR. RIENZI: YOUR HONOR, ARE YOU ASKING FOR
5 PLAINTIFFS TO PRESENT THEIR NEXT WITNESS?

6 THE COURT: YES.

7 MS. BARCLAY: YOUR HONOR, THE PLAINTIFFS
8 WOULD LIKE TO CALL MR. JAMES AMATO TO THE STAND.

9 MS. WINDHAM: YOUR HONOR, IF I MAY, WE ARE
10 CALLING MR. AMATO TO THE STAND TODAY. THERE WAS DISCUSSION
11 YESTERDAY ABOUT THE DECLARATIONS OF BISHOP MCINTYRE AND
12 JAMES BLACK. WE BELIEVE THAT MR. AMATO'S TESTIMONY TODAY
13 WILL BE ABLE TO COVER THE RELEVANT PORTIONS OF THE TESTIMONY
14 OF BISHOP MCINTYRE AND JAMES BLACK.

15 I WOULD ALSO NOTE FOR THE COURT THAT MR.
16 AMATO'S DECLARATION ALREADY AUTHENTICATED A NUMBER OF
17 DOCUMENTS WHICH WERE ATTACHED TO PLAINTIFF'S MOTION.

18 THE COURT: OKAY. IT'S NOTED.

19 (WITNESS SWORN.)

20 THE CLERK: STATE AND SPELL YOUR NAME FOR THE
21 RECORD, PLEASE.

22 THE WITNESS: JAMES AMATO, A-M-A-T-O.

23 DIRECT EXAMINATION

24 BY MS. BARCLAY:

25 Q. GOOD AFTERNOON, MR. AMATO.

1 A. GOOD AFTERNOON.

2 Q. WHAT IS YOUR CURRENT RELATIONSHIP TO CATHOLIC
3 SOCIAL SERVICES?

4 A. I SERVE AS A SECRETARY FOR CATHOLIC HUMAN
5 SERVICES, OVERSEE CATHOLIC SOCIAL SERVICES AND
6 NUTRITIONAL DEVELOPMENT SERVICES.

7 Q. IN WHAT CITY DO YOU CURRENTLY LIVE?

8 A. PHILADELPHIA.

9 Q. HOW LONG HAVE YOU LIVED THERE?

10 A. MY LIFE, MY WHOLE LIFE.

11 Q. CAN YOU TELL ME A LITTLE BIT ABOUT YOUR WORK
12 EXPERIENCE IN THE CHILD WELFARE ARENA?

13 A. YES. I HAVE BEEN INVOLVED IN CHILD WELFARE
14 SINCE 1976 WHEN I GRADUATED FROM TEMPLE WITH A DEGREE IN
15 SOCIAL WORK. WORKED FOR A COUPLE OF YEARS IN
16 RESIDENTIAL CARE FOR CHILDREN AT AN AGENCY AFFILIATED
17 WITH THE ARCHDIOCESE, AND THEN WENT ON TO GET A MASTER'S
18 DEGREE IN SOCIAL WORK AND WORKED AT CHILDREN'S AID
19 SOCIETY AND FOSTER-CARE AGENCY FOR A COUPLE OF YEARS.
20 AND THEN MOVED INTO PROGRESSIVE MANAGEMENT, RUNNING A
21 HOME FOR CHILDREN RUN BY CATHOLIC SOCIAL SERVICES, AND
22 THEN INTO SENIOR MANAGEMENT.

23 Q. HOW LONG TOTAL HAVE YOU BEEN WORKING IN CHILD
24 WELFARE?

25 A. 42 YEARS.

1 Q. CAN YOU DESCRIBE A LITTLE BIT MORE ABOUT YOUR
2 ROLE AT CATHOLIC SOCIAL SERVICES?

3 A. MY ROLE INVOLVES TWO THINGS BASICALLY. ONE, I
4 AM THE EXECUTIVE VICE-PRESIDENT OF ALL 13 OF OUR
5 NONPROFIT CORPORATIONS, AND I MANAGE THE OPERATIONS, THE
6 DAILY OPERATIONS OF THE CATHOLIC HUMAN SERVICES.

7 Q. AND CAN YOU TELL US A LITTLE BIT ABOUT THE WAY
8 IN WHICH CATHOLIC SOCIAL SERVICES AS A NONPROFIT
9 ORGANIZATION IS ORGANIZED?

10 A. CATHOLIC SOCIAL SERVICES IS ORGANIZED INTO
11 SEVERAL DIFFERENT DIVISIONS. YOUTH SERVICES IS A
12 PROMINENT DIVISION. DEVELOPMENTAL PROGRAM SERVING THOSE
13 WITH INTELLECTUAL DISABILITIES. HOUSING AND HOMELESS
14 AND FAMILY BASED SERVICES. AND WE ALSO HAVE CATHOLIC
15 HOUSING AND COMMUNITY SERVICES, WHICH ADDRESSES THE
16 NEEDS OF SENIORS.

17 Q. DOES SENIOR LEADERSHIP REPORT TO YOU?

18 A. YES.

19 Q. AND DO YOU HAVE A HAND IN BOTH GOVERNANCE AND
20 OPERATIONS?

21 A. I DO.

22 Q. I BELIEVE CATHOLIC SOCIAL SERVICES HAS TWO
23 PROGRAMS RELEVANT TO FOSTER CHILDREN. CAN YOU TELL US A
24 LITTLE BIT ABOUT BOTH OF THOSE.

25 A. THE MOST LONG-STANDING PROGRAM IS CATHOLIC

1 SOCIAL SERVICES FOSTER-CARE DEPARTMENT, WHICH HAS BEEN
2 -- HAS ITS ROOTS IN 1917 AS THE CATHOLIC CHILDREN'S
3 BUREAU AND THEN GREW INTO CATHOLIC SOCIAL SERVICES
4 FOSTER-CARE DEPARTMENT, TODAY SERVING ABOUT 120 SOME
5 CHILDREN AND 100 FOSTER HOMES. AND WE ALSO HAVE OUR
6 RESIDENTIAL SERVICES FOR ADJUDICATED DELINQUENT YOUTH,
7 RUN BY SAINT GABRIEL'S SYSTEM AND DEPENDENT ADOLESCENT,
8 TEENS, BOYS AND GIRLS, RUN BY ST. FRANCIS AND ST.
9 VINCENT'S HOMES.

10 Q. DOES CATHOLIC SOCIAL SERVICES ALSO HAVE A CUA?

11 A. WE ALSO HAVE A CUA THAT HANDLES MOST OF
12 NORTHEAST PHILADELPHIA.

13 Q. I WANT TO TALK TO YOU A LITTLE BIT ABOUT THE
14 RELIGIOUS MINISTRY OF CATHOLIC SOCIAL SERVICES. CAN YOU
15 TELL US SOME OF THE WAYS IN WHICH, ON A DAILY OR WEEKLY
16 BASIS, CATHOLIC SOCIAL SERVICES IS OPERATING IN A
17 RELIGIOUS FASHION?

18 A. YES. ALL OF OUR MEETINGS BEGIN WITH -- AND MANY
19 TIMES END WITH PRAYER. OUR FACILITIES ALL HAVE CHAPELS.
20 THEY ARE WELL USED BY STAFF. AND THAT OUR CATHOLIC
21 IDENTITY IS VERY APPARENT IN OUR RELIGIOUS ARTIFACTS ON
22 THE WALLS AND THOSE KINDS OF THINGS.

23 Q. AND HOW FREQUENTLY IS PRAYER INVOLVED IN WHAT
24 YOU DO?

25 A. DAILY, SEVERAL TIMES DAILY.

1 Q. HOW HAS YOUR RELIGIOUS MISSION BEEN MADE
2 APPARENT TO THOSE YOU INTERACT WITH, INCLUDING THE CITY?

3 A. WELL, AS FAR AS THE CITY GOES, EVERY YEAR WE
4 SUBMIT A PROGRAM DESCRIPTION THAT I BELIEVE IS PART OF
5 THE CONTRACT, AND THAT CLEARLY IDENTIFIES OUR CATHOLIC
6 IDENTITY, OUR HISTORY AND OUR MISSION, SO THAT'S VERY
7 CLEAR. ALSO WE DO A LOT IN ORIENTATION TRAINING WITH
8 STAFF THAT UNDERLINES THE IMPORTANCE OF THAT TO WHO WE
9 ARE AND WHY WE DO WHAT WE DO.

10 Q. HOW MANY AT-RISK CHILDREN WERE SERVED ACROSS ALL
11 CATHOLIC SOCIAL SERVICES PROGRAMS LAST YEAR?

12 A. OVER 1500.

13 Q. IS PROVIDING FOSTER-CARE SERVICES A RELIGIOUS
14 MINISTRY FOR CATHOLIC SOCIAL SERVICES?

15 A. THE CHURCH'S CARE FOR ORPHANS -- WHICH IS AN
16 OUTDATED WORD -- AND AT-RISK CHILDREN IS CENTURIES OLD.
17 IN PHILADELPHIA IT DATES BACK TO 1797, WHEN WE RESPONDED
18 TO THE NEEDS OF CHILDREN WHOSE FAMILIES -- PARENTS HAD
19 DIED DUE TO YELLOW FEVER. SO INTRINSIC TO WHO WE ARE
20 AND WHAT WE DO IS THE CARE OF AT-RISK CHILDREN AND WHO
21 ARE MANY TIMES THE POOREST CHILDREN IN OUR COMMUNITIES.

22 Q. AND SO JUST TO CONFIRM, IS FOSTER-CARE SERVICES
23 A RELIGIOUS MINISTRY OF CATHOLIC SOCIAL SERVICES?

24 A. IT ABSOLUTELY IS, YES.

25 Q. YOU MENTIONED SOME OF THE ROOTS OF YOUR PROGRAM

1 WAS THE EPIDEMIC OF YELLOW FEVER. DID THAT ULTIMATELY
2 FORMALIZE IN A SPECIFIC PROGRAM IN THE EARLY 1900'S?

3 A. YES. THE FIRST RESPONSE WAS THAT, AND THEN THAT
4 GREW INTO THE ORPHANAGE MOVEMENT IN THE MID-19TH
5 CENTURY. AND THAT FOLLOWED BY THE ESTABLISHMENT OF THE
6 CATHOLIC CHILDREN'S BUREAU IN 1917, WHICH WAS DEDICATED
7 TO FOSTER-CARE.

8 Q. SO THAT 1917 CATHOLIC CHILDREN'S BUREAU WAS
9 PROVIDING FOSTER-CARE TO CHILDREN?

10 A. YES.

11 Q. WAS THERE ANY GOVERNMENT INVOLVEMENT WITH THIS
12 PROGRAM IN 1917?

13 A. TO MY UNDERSTANDING, NO.

14 Q. HOW DID IT WORK? HOW DID YOU FIND CHILDREN AND
15 CARE FOR THEM? CAN YOU WALK US THROUGH THAT A LITTLE
16 BIT?

17 A. WELL, THE RELIGIOUS SISTERS WHO RAN CATHOLIC
18 CHILDREN'S BUREAU HAD A DEEP NETWORK OF RELATIONSHIPS
19 AROUND THE CITY WITH PARISHES AND COMMUNITY GROUPS. AND
20 WHEN IT BECAME KNOWN THAT A CHILD WAS AT RISK, THEY
21 WOULD DO A HOME EVALUATION. IF THE CHILD NEEDED TO BE
22 REMOVED -- IN THOSE TIMES, MANY TIMES THE PARENTS WOULD
23 AGREE TO THAT, BECAUSE THEY ARE CALLED VOLUNTARY
24 PLACEMENT. THE CHILD WOULD BE REMOVED, PLACED IN A
25 FOSTER HOME AND WE WOULD TRACK THEM AND THE CHILD'S

1 PROGRESS IN THAT HOME.

2 Q. I THINK YOU SAID WERE THESE NETWORKS KNOWN
3 THROUGH CATHOLIC PARISHES?

4 A. CATHOLIC PARISHES WERE A GREAT SOURCE OF
5 REFERRALS FOR THAT PROGRAM.

6 Q. SO WHEN DID CATHOLIC PARTNERSHIP WITH GOVERNMENT
7 BEGIN TO PROVIDE THESE SERVICES?

8 A. WELL, I CAME INTO THE WORK IN 1976, AND I CAN
9 TELL YOU THEN, IT WAS WELL ESTABLISHED. SO MY GUESS IS
10 THAT THIS HAPPENED IN THE LATE '40'S, EARLY '50'S, THAT
11 THE CONTRACTS BECAME INVOLVED WITH GOVERNMENT.

12 Q. AND AT THAT POINT WHEN THE GOVERNMENT BECAME
13 INVOLVED, IS IT YOUR UNDERSTANDING THAT THE GOVERNMENT
14 TOOK OVER ALL ASPECTS OF IT OR WERE THERE THINGS THAT
15 CATHOLIC SOCIAL SERVICES WAS STILL DOING AT THE
16 BEGINNING OF THAT PARTNERSHIP?

17 MR. FIELD: YOUR HONOR, I OBJECT, THE WITNESS
18 SAID HE WAS NOT AROUND WHEN THE GOVERNMENT BECAME INVOLVED.

19 THE COURT: TO THE EXTENT HE KNOWS THE
20 HISTORY, I AM GOING TO OVERRULE THE OBJECTION.

21 THE WITNESS: SO REPEAT THE QUESTION, PLEASE.
22 BY MS. BARCLAY:

23 Q. SURE. SO WHEN THIS GOVERNMENT PARTNERSHIP
24 BEGAN, WHAT IS YOUR UNDERSTANDING AS FAR AS THE ROLE
25 THAT CATHOLIC SOCIAL SERVICES WOULD PLAY WITH REGARD TO

1 REMOVING AND PLACING CHILDREN AND THE ROLE THAT THE
2 GOVERNMENT PLAYED.

3 A. CATHOLIC SOCIAL SERVICES, TO MY UNDERSTANDING AT
4 THOSE TIMES, HAD TREMENDOUS OVERSIGHT OF THE INTAKE
5 FUNCTION. SO THAT ONCE A CHILD BECAME KNOWN TO BE AT
6 RISK AND WAS EVALUATED AS SUCH, WE WOULD PLACE THE CHILD
7 AND SIMPLY ADVISE THE CITY THAT THERE WAS A VOLUNTARY
8 PLACEMENT AND THEY WOULD THEN MOVE FORWARD AND SUPPORT
9 THAT.

10 Q. BY THE TIME YOU JOINED CATHOLIC SOCIAL SERVICES
11 IN THE '70'S, HOW HAD THE ROLES CHANGED AS FAR AS WHAT
12 THE GOVERNMENT WAS IN CHARGE OF?

13 A. WELL, THINGS CHANGED FOR THE BETTER AND THEY
14 CHANGED SWIFTLY. AND THEY'RE NOW -- IN MY TIME FROM THE
15 MID-'70'S ON, ALL THE INTAKE WAS HANDLED THROUGH THE
16 DEPARTMENT OF HUMAN SERVICES, AND THAT WAS DONE AFTER A
17 CHILD PROTECTIVE SERVICES INVESTIGATION, THE CHILD WAS
18 SEEN AS NEEDING TO BE PLACED.

19 Q. NOW AT THIS TIME IS CATHOLIC SOCIAL SERVICES
20 AUTHORIZED TO PROVIDE FOSTER-CARE SERVICES WITHOUT A
21 GOVERNMENT CONTRACT?

22 A. YOU REALLY CAN'T DO IT WITHOUT A GOVERNMENT
23 CONTRACT.

24 Q. SO YOU WOULD BE BREAKING THE LAW IF YOU TRIED TO
25 PROVIDE FOSTER-CARE SERVICES WITHOUT A CONTRACT?

1 A. YES.

2 Q. DOES CATHOLIC SOCIAL SERVICES MAKE MONEY FROM
3 THIS GOVERNMENT CONTRACT IN PROVIDING THESE SERVICES?

4 A. ABSOLUTELY NOT. AND JUST TO GIVE YOU AN IDEA IN
5 -- LAST YEAR WE SUBSIDIZED THESE SERVICES TO THE TUNE OF
6 \$3.8 MILLION.

7 Q. WHERE DO THOSE SUBSIDIES COME FROM?

8 A. THEY COME FROM ENDOWMENTS, DONATIONS AND GENERAL
9 ARCHDIOCESAN SUPPORT.

10 Q. YESTERDAY THE ATTORNEYS FOR DHS REFERRED TO
11 CATHOLIC SOCIAL SERVICES AS A BUSINESS. IS THAT HOW YOU
12 THINK OF YOUR WORK?

13 A. I REALLY DON'T KNOW OF ANY BUSINESS THAT WOULD
14 START OR BE ABLE TO FINISH WITH A \$3.8 MILLION SUBSIDY.
15 I NEVER THOUGHT OF IT AS A BUSINESS.

16 Q. SO BEFORE YESTERDAY, HAVE YOU EVER HEARD THAT?

17 A. NEVER.

18 Q. HOW WOULD YOU DESCRIBE THE WORK THAT CATHOLIC
19 SOCIAL SERVICES IS DOING?

20 A. A RELIGIOUS MINISTRY BASED ON A NONPROFIT
21 CORPORATION -- CORPORATIONS THAT HAVE A DEEP COMMITMENT
22 TO THE POOR AND THE VULNERABLE IN OUR COMMUNITY.

23 Q. I WANT TO TALK TO YOU A LITTLE BIT MORE ABOUT
24 SOME OF THE LOGISTICS OF FOSTER-CARE. WHEN CATHOLIC
25 SOCIAL SERVICES PERFORMS A HOME STUDY, WHAT DOES THAT

1 PROCESS ENTAIL?

2 A. IT ENTAILS AN ASSESSMENT OF THE RELATIONSHIPS
3 THAT EXIST IN THAT FOSTER HOME, THE SUITABILITY OF THE
4 PHYSICAL PLAN OF THE FOSTER HOME TO BE SAFE FOR A CHILD,
5 AND THEN OBVIOUSLY GETTING CLEARANCES TOO FOR EVERYBODY
6 IN THE HOME. IF ALL OF THOSE THINGS ARE UP TO PAR, THEN
7 WE -- THEN THE HOME IS CERTIFIED AS A FOSTER HOME AND
8 THE HOME STUDY IS COMPLETE.

9 Q. DOES CATHOLIC SOCIAL SERVICES REQUEST A PASTORAL
10 REFERENCE AS PART OF THAT PROCESS?

11 A. IT REQUESTS A REFERENCE FROM CLERGY FOR ALL
12 INTERESTED PEOPLE WHO APPLY TO BE FOSTER PARENTS.

13 Q. SO IS IT CORRECT THAT THEY ASK FOR A PASTORAL
14 REFERENCE?

15 A. YES, THEY REQUEST A PASTORAL REFERENCE.

16 Q. WITH REGARD TO THE RELATIONSHIPS THAT YOU SAID
17 THAT YOU WOULD ANALYZE, DOES THIS PROCESS CULMINATE IN
18 ANYTHING RELEVANT TO THOSE RELATIONSHIPS AS FAR AS
19 WRITING THAT YOU WOULD PROVIDE?

20 A. THE PROCESS CULMINATES AFTER THE EVALUATION IS
21 DONE AND A CERTIFIED HOME STUDY, WHICH WOULD ENABLE THE
22 FAMILY TO ACTUALLY BEGIN RECEIVING CHILDREN IN THEIR
23 HOME.

24 Q. DOES THAT HOME STUDY INCLUDE ANY WRITTEN
25 ENDORSEMENTS OF THOSE RELATIONSHIPS?

1 A. IT IS -- THE HOME STUDY IS A WRITTEN EVALUATION,
2 YES.

3 Q. AND AN ENDORSEMENT?

4 A. AND AN ENDORSEMENT, YES.

5 Q. ARE YOU AWARE OF ANY POLICY OR LAW THAT SAYS
6 THAT AN AGENCY MUST CERTIFY ANY QUALIFIED PROSPECTIVE
7 FOSTER FAMILY THAT WANTS TO BE CERTIFIED BY THAT AGENCY?

8 A. NO, I AM NOT AWARE OF THAT LAW.

9 MS. BARCLAY: PERMISSION TO APPROACH THE
10 WITNESS, YOUR HONOR.

11 THE COURT: YES.

12 BY MS. BARCLAY:

13 Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS
14 BEEN LABELED AND IT'S EXHIBIT NUMBER 4. MR. AMATO, I
15 HAVE APPROACHED YOU WITH WHAT IS DESCRIBED AS
16 PENNSYLVANIA STATE RESOURCE -- FAMILY ASSOCIATION
17 RESOURCE PARENT MANUAL. ARE YOU FAMILIAR WITH THIS
18 DOCUMENT?

19 A. I HAVE HEARD OF IT, YES.

20 Q. AND AT THE TOP OF PAGE 7, IT SAYS THAT: NOTE,
21 THESE ARE MINIMUM REQUIREMENTS AND INDIVIDUAL AGENCIES
22 WILL VARY WITH THEIR POLICIES. IS THAT CONSISTENT WITH
23 YOUR UNDERSTANDING THAT AGENCIES CAN HAVE THEIR OWN
24 ADDITIONAL REQUIREMENTS OR CONSIDERATIONS FOR WHY THEY
25 WOULD CERTIFY A FOSTER PARENT?

1 A. YES, IT IS.

2 Q. WHAT ARE THE RELIGIOUS BELIEFS OF CATHOLIC
3 SOCIAL SERVICES WITH RESPECT TO MARRIAGE?

4 A. THAT A MARRIAGE IS A SACRED BOND BETWEEN A MAN
5 AND A WOMAN.

6 Q. ACROSS ALL PROGRAMS WHAT DOES THAT MEAN FOR
7 LGBTQ INDIVIDUALS WHO MIGHT WANT OR NEED SERVICES FROM
8 CATHOLIC?

9 A. WE REGULARLY SERVE PROUDLY PEOPLE OF ALL FAITHS,
10 ALL BACKGROUNDS, WITHOUT REGARD TO SEXUAL IDENTITY, SO
11 THAT TODAY WE ARE SERVING FOLKS FROM THE LGBTQ
12 COMMUNITY.

13 Q. WHAT ABOUT THE SAME-SEX COUPLES WHO APPROACHED
14 CATHOLIC ABOUT RECEIVING A HOME STUDY SERVICE TO BECOME
15 FOSTER PARENTS? HAS THAT SITUATION EVER ARISEN?

16 A. WELL, THAT SITUATION HAS NOT ARISEN, AND -- TO
17 MY KNOWLEDGE SINCE THE TIME THAT I'VE BEEN IN CATHOLIC
18 SOCIAL SERVICES.

19 Q. AND HYPOTHETICALLY SPEAKING, IF CATHOLIC WERE
20 FORCED TO PROVIDE A WRITTEN CERTIFICATION ENDORSING A
21 SAME-SEX MARRIAGE, WOULD THAT VIOLATE THE RELIGIOUS
22 EXERCISE OF CATHOLIC SOCIAL SERVICES?

23 A. YES, IT WOULD.

24 Q. I WANT TO TALK TO YOU A LITTLE BIT ABOUT SOME OF
25 THE STRENGTHS AND HALLMARKS OF CATHOLIC SOCIAL SERVICES

1 FOSTER-CARE PROGRAM. WHAT WOULD YOU DESCRIBE AS SOME OF
2 THE STRENGTHS AND UNIQUE ASPECTS OF YOUR PROGRAM?

3 A. I THINK THE KEY STRENGTH IS THE ACCUMULATED
4 KNOWLEDGE AFTER DOING IT FOR 100 YEARS. THE STAFF, OUR
5 TURNOVER IS VERY, VERY LOW. THE STAFF HAS EXCELLENT
6 RELATIONSHIPS WITH THE FOSTER PARENTS AND I THINK THAT
7 LEADS TO -- WE KEEP OUR CASE LOADS LOW SO THAT WE CAN
8 CONTINUE TO PROVIDE ADEQUATE SUPPORT, AND I THINK THAT
9 KIND OF RESULTS IN SOME OF THE THINGS THAT WE HEARD
10 YESTERDAY.

11 Q. IT IS YOUR UNDERSTANDING THAT YOUR CASE LOADS
12 ARE DELIBERATELY LOWER THAN MANY OTHER AGENCIES?

13 A. ABSOLUTELY, PARTICULARLY NOW WITH THE NEW
14 STANDARDS THAT COME WITH THE CUA.

15 Q. HOW LONG HAS YOUR LONGEST STAFF MEMBER BEEN
16 THERE?

17 A. OVER 35 YEARS.

18 Q. HOW DO YOU THINK THE CONTINUITY WITH YOUR STAFF
19 IMPACTS THE CHILDREN THAT YOU SERVE?

20 A. WHAT I HAVE HEARD AND WITNESSED IS OUR FOSTER
21 PARENTS CAN CALL AT ANY TIME AND GET ACCESS TO OUR
22 SOCIAL WORKERS. BUT IF THEY CAN'T, WE HAVE BOB MONTORO
23 RUNNING IT WHO HAS BEEN THERE FOR MANY YEARS. WE HAVE
24 CHRISTY REED, THE SUPERVISOR, WHO HAS BEEN THERE FOR
25 MANY YEARS. AND WE HAVE AN EILEEN MULLEN WHO IS A CASE

1 WORKER WHO HAS DONE MOST OF THESE HOME STUDY, WHO HAS
2 BEEN THERE ABOUT 35 YEARS, AND SHE IS READILY AVAILABLE
3 AND ACCESSIBLE AND I FIND THAT FOSTER PARENTS SEE THAT
4 AS A GREAT SOURCE OF SUPPORT AND HOPE.

5 Q. FROM YOUR PERSONAL EXPERIENCE HAVE YOU EVER
6 OBSERVED THERE TO BE A SURPLUS -- OR WHICH HAVE YOU
7 OBSERVED, A SURPLUS OR A SHORTAGE OF FOSTER FAMILIES FOR
8 FOSTER CHILDREN?

9 A. ABSOLUTELY THERE IS A SHORTAGE OF FOSTER
10 FAMILIES FOR CHILDREN, PARTICULARLY ADOLESCENT CHILDREN.

11 Q. WHAT LED YOU TO ARRIVE AT THIS CONCLUSION?

12 A. READING, GOING TO MEETINGS WITH THE SENIOR
13 MANAGEMENT FROM DHS, SEEING SOME OF THE CHILDREN THAT WE
14 HAVE SERVED IN GROUP CARE THAT HAVE THE PROFILE THAT
15 COULD BE MATCHED WITH A FOSTER FAMILY BUT THERE'S SIMPLY
16 NOT SUFFICIENT FAMILIES FOR THE ADOLESCENT CHILDREN.

17 Q. WHAT PHYSICALLY HAPPENS -- WHAT ELSE PHYSICALLY
18 HAPPENS TO CHILDREN WHEN THERE ARE NOT ENOUGH FOSTER
19 HOMES FOR CHILDREN?

20 A. I THINK THE MOST SAD THING THAT HAPPENS IS THAT
21 A CHILD WOULD HAVE TO WAIT AND SIT IN THE CHILD CARE
22 ROOM AT THE CITY WHILE AGENCIES ARE APPROPRIATELY
23 PRESSED TO FIND A FOSTER HOME FOR THEM. THAT WOULD BE
24 ONE ITEM THAT WE ALL ARE TRYING TO AVOID. NUMBER TWO
25 WOULD BE THE POTENTIAL PLACEMENT OF A YOUNG KID IN A

1 CONGREGATE CARE SHELTER, WHICH NOW BEST PRACTICE SAYS IS
2 NOT THE BEST WAY TO GO. SO THOSE WOULD BE JUST TWO OF
3 THE THINGS THAT WOULD COME TO MIND.

4 MS. BARCLAY: PERMISSION TO APPROACH THE
5 WITNESS, YOUR HONOR?

6 THE COURT: YES.

7 BY MS. BARCLAY:

8 Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS
9 BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 5.

10 MR. FIELD: YOUR HONOR, MAY WE HAVE A MOMENT
11 TO REVIEW THIS EXHIBIT? WE HAVE NOT SEEN THIS DOCUMENT
12 BEFORE.

13 THE COURT: OKAY. I AM GOING TO TAKE A BRIEF
14 RECESS. I HAVE ANOTHER MATTER I HAVE TO HANDLE. I WILL BE
15 ABOUT TEN MINUTES.

16 THE CLERK: ALL RISE.

17 (BRIEF RECESS.)

18 THE COURT: OKAY. YOU MAY BE SEATED.

19 MS. BARCLAY: MAY WE RESUME?

20 MR. FIELD: YOUR HONOR, I WOULD ASK AN OFFER
21 OF PROOF ON THIS EXHIBIT, IS IT P-5?

22 THE COURT: YES.

23 MS. BARCLAY, CAN YOU IDENTIFY IT FIRST FOR
24 THE RECORD.

25 MS. BARCLAY: THIS IS THE CERTIFICATE GRANTED

1 TO PHILADELPHIA DHS TO OPERATE PHILADELPHIA COUNTY CHILDREN
2 AND YOUTH SERVICES AND DISCUSSES SOME OF THE ISSUES THAT DHS
3 WAS FACING WITH REGARD TO BEING ABLE TO HAVE ENOUGH HOMES TO
4 PLACE CHILDREN. AND IT IS RELEVANT TO ANOTHER DOCUMENT THAT
5 WE WILL BE DISCUSSING THAT CATHOLIC SOCIAL SERVICES PROVIDED
6 TO DHS TO TRY AND ASSIST WITH THIS PROBLEM.

7 THE COURT: OKAY.

8 MR. FIELD: YOUR HONOR, I APOLOGIZE. DHS IS
9 A LARGE ORGANIZATION WITH A LONG HISTORY. THIS IS A
10 DOCUMENT FROM 2016. I AM NOT CLEAR ON THE RELEVANCE OF THE
11 ENTIRETY OF DHS'S HISTORY OF THE CARE WITH CHILDREN. THIS
12 LITIGATION, WHICH I UNDERSTAND TO BE ABOUT THIS ALLEGED
13 RELIGIOUS BURDEN AND THE HARMS THAT FLOW THEREFROM. I
14 RESPECTFULLY SUBMIT WE WILL BE HERE A LONG TIME IF WE ARE
15 GOING INTO THE ENTIRETY OF DHS'S CARE -- EVEN RECENT YEARS.

16 MS. BARCLAY: YOUR HONOR, THERE'S ONLY ONE
17 PARAGRAPH THAT I WILL JUST BRIEFLY READ AND THEN --

18 THE COURT: I AM GOING TO OVERRULE THE
19 OBJECTION.

20 BY MS. BARCLAY:

21 Q. MR. AMATO, IF YOU CAN TURN WITH ME TO THE PAGE
22 THAT IS TABBED, AND I AM JUST GOING TO READ TO YOU. IT
23 SAYS: CHILDREN ARE STAYING AT DHS OVERNIGHT IN THE
24 CHILDCARE ROOM AND AT THE CUA WITHOUT ADEQUATE AND
25 TIMELY PLACEMENT. THE REPORTED NUMBER OF CHILDREN

1 STAYING OVERNIGHT AT DHS AND CUA COMBINED DURING
2 CALENDAR YEAR 2015 WAS 84. THIS NUMBER IS PROBABLY
3 HIGHER AS SOME CUA'S DID NOT MAINTAIN RECORDS OF WHICH
4 CHILDREN STAYED OVERNIGHT AND WHEN THEY STAYED
5 OVERNIGHT. THIS IS AN UNACCEPTABLE PRACTICE AND AT THE
6 STATE'S REQUEST DHS HAS SUBMITTED A PLAN TO ALLEVIATE
7 THIS CONCERNING ISSUE.

8 NOW, BEFORE WE RECESSED, YOU WERE
9 DISCUSSING THE ISSUE OF WHEN CHILDREN STAY OVERNIGHT AT
10 THE CHILDCARE ROOM. AND AROUND THIS TIME WAS THERE
11 ANYTHING THAT CATHOLIC SOCIAL SERVICES DID TO TRY AND
12 ASSIST DHS WITH THIS ISSUE?

13 A. ACTING COMMISSIONER JESSICA SHAPIRO AT THAT TIME
14 APPROACHED ME, KNOWING OUR HISTORY IN PROVIDING
15 EMERGENCY SHELTER FOR CHILDREN, AND ASKED ME FOR A
16 PROPOSAL TO RESUME THAT SHELTER.

17 MS. BARCLAY: YOUR HONOR, PERMISSION TO
18 APPROACH THE WITNESS.

19 THE COURT: YES.

20 BY MS. BARCLAY:

21 Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS
22 BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 6.

23 A. YES.

24 Q. WHAT IS THIS DOCUMENT, MR. AMATO?

25 A. THIS IS THE COVER LETTER THAT ACCOMPANIED THE

1 BUDGET PROPOSAL AND A BRIEF DESCRIPTION OF WHAT WE COULD
2 OFFER TO MEET THAT EMERGENT NEED.

3 Q. JUST DESCRIBE AGAIN FOR US, WHAT WAS THE NEED
4 THAT THIS SHELTER WAS MEANT TO ADDRESS?

5 A. AN IMMEDIATE RESOURCE - AN IMMEDIATE GROUP CARE
6 RESOURCE FOR UP TO 12 CHILDREN WHO WERE IN -- THERE WAS
7 NOT AN IMMEDIATE FOSTER FAMILY AVAILABLE.

8 Q. AND SO WAS THIS SHELTER OPTION SEEKING TO MAKE
9 IT SO THAT LESS CHILDREN WOULD END UP STAYING OVERNIGHT
10 IN THAT CHILDCARE ROOM?

11 A. YES.

12 Q. ARE YOU AWARE OF INSTANCES WHERE A FOSTER AGENCY
13 WILL CHOOSE NOT TO PERFORM A HOME STUDY FOR A
14 PROSPECTIVE COUPLE FOR VARIOUS REASONS?

15 A. YES. THERE'S A COUPLE OF REASONS THAT I AM
16 AWARE OF. ONE WOULD BE THE GEOGRAPHICAL LOCATION OF THE
17 FOSTER PARENT, SO THAT IT WOULD BE BETTER FOR THEM TO
18 HAVE THE HOME TO BE DONE TO AN AGENCY CLOSER TO THEM.
19 ANOTHER WOULD BE A SPECIAL MEDICAL SITUATION, WHERE WE
20 WOULD REFER A FOSTER PARENT BECAUSE WE DON'T HAVE A
21 SPECIAL MEDICAL SERVICE, NOR DO WE HAVE A LICENSE FOR
22 THAT. ANOTHER WOULD BE BEHAVIORAL -- A SPECIALIZED
23 BEHAVIORAL HEALTH HOME, BECAUSE AGAIN, WE DON'T PROVIDE
24 SPECIALIZED BEHAVIORAL HEALTH. IT USED TO BE CALLED
25 TREATMENT FOSTER-CARE. THERE ARE ALSO SOME AGENCIES

1 THAT SPECIALIZE IN FOSTER HOMES FOR TEEN PREGNANT GIRLS
2 AND TEEN MOTHER/BABIES. FURTHER THERE ARE AGENCIES WHO
3 SPECIALIZE, AND ONE IS IN SUBURBAN PHILADELPHIA, IN HOME
4 STUDIES FOR LGBTQ INDIVIDUALS AND COUPLES. AND FINALLY
5 THERE ARE AGENCIES WHO SPECIALIZE IN PROVIDING FOSTER
6 HOMES FOR NATIVE AMERICAN CHILDREN SO THEY ARE PLACED
7 WITH NATIVE AMERICAN FAMILIES.

8 Q. ARE THERE ALSO AGENCIES WHO HAVE SPECIALTY IN,
9 FOR EXAMPLE, OUTREACH TO THE LATIN AMERICAN COMMUNITY?

10 A. YES. AND THE TWO THAT COME IMMEDIATELY TO MIND
11 ARE CONCILIO AND APM, WHICH HAVE A DEEP-ROOTED HISTORY
12 IN THE LATINO COMMUNITY. ALMOST ALL STAFF -- I WOULD
13 ASSUME, I THINK ALL, ARE BILINGUAL AND HAVE -- BOTH HAVE
14 QUALITY FOSTER -- AND RECOGNIZED FOSTER-CARE PROGRAMS.

15 MS. BARCLAY: PERMISSION TO APPROACH THE
16 WITNESS, YOUR HONOR.

17 THE COURT: YES.

18 BY MS. BARCLAY:

19 Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS
20 BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 7. THIS IS A
21 DOCUMENT FROM CONCILIO'S WEBSITE. IT SAYS THAT: THE
22 PURPOSE OF THIS AGENCY IS TO PROVIDE SOCIAL,
23 EDUCATIONAL, CULTURAL PREVENTION AND INTERVENTION
24 SERVICES AND PROGRAMS TO UNDERSERVED YOUNG PEOPLE AND
25 FAMILIES IN THE PHILADELPHIA REGION AND TO SERVE AS A

1 COMMUNITY VOICE FOR THE DIVERSE LATINO COMMUNITY ON
2 ISSUES AFFECTING CHILDREN, YOUTH AND FAMILY.

3 THIS IS CONSISTENT WITH YOUR
4 UNDERSTANDING THAT THIS IS AN AGENCY THAT HAS TARGETED
5 OUTREACH TO THE LATINO COMMUNITY.

6 MR. FIELD: OBJECTION, YOUR HONOR, ON THE
7 BASIS OF HEARSAY AND RELEVANCE.

8 THE COURT: SUSTAINED, AS TO RELEVANCE.

9 MR. FIELD: I ASK THAT THE READING WOULD BE
10 STRICKEN FROM THE RECORD.

11 THE COURT: IT WILL BE STRICKEN.
12 BY MS. BARCLAY:

13 Q. IS IT YOUR UNDERSTANDING THAT THERE ARE ANY
14 AGENCIES WHO SPECIALIZE IN SERVICING KIN CARE
15 POPULATIONS?

16 A. I THINK THE MOST RENOWNED AGENCY FOR THAT IS
17 SECOND CHANCE.

18 Q. AND ARE YOU AWARE -- ANY TIME HAS THERE BEEN A
19 TIME WHERE THEY EXCLUSIVELY SERVED KIN CARE POPULATIONS?

20 A. WHEN THEY FIRST BECAME --

21 MR. FIELD: OBJECTION.

22 THE WITNESS: WHEN THEY FIRST BECAME KNOWN TO
23 PHILADELPHIA, MY UNDERSTANDING IS --

24 THE COURT: OVERRULED.

25 THE WITNESS: -- THEY WERE ROOTED IN

1 ALLEGHENY COUNTY WITH AN EXPERTISE IN THE KIN CARE FAMILIES,
2 PARTICULARLY MINORITY KIN CARE FAMILIES.

3 BY MS. BARCLAY:

4 Q. THANK YOU.

5 HAVE YOU EVER UNDERSTOOD IT TO BE A
6 PROBLEM FOR AN AGENCY TO DECLINE TO PERFORM A HOME STUDY
7 AND INSTEAD CONNECT A FAMILY WITH A DIFFERENT AGENCY
8 THAT THE AGENCY BELIEVED WOULD BE A BETTER FIT FOR THEM?

9 A. NEVER SAW IT AS A PROBLEM. IN FACT, IT'S BEST
10 PRACTICE AND WIDELY KNOWN IN SOCIAL WORK IS INFORMATION
11 REFERRAL TO GET A FAMILY OR AN INDIVIDUAL CONNECTED WITH
12 THE AGENCY THAT CAN BEST SERVE THEM.

13 Q. SO YOU JUST USED THE TERM "INFORMATION
14 REFERRAL," AND I JUST WANT TO CLARIFY. THAT'S NOT THE
15 SAME THING AS WHEN DHS MAKES A REFERRAL TO AN AGENCY,
16 RIGHT?

17 A. NO, THAT'S --

18 MR. FIELD: OBJECTION, LEADING.

19 THE COURT: OVERRULED.

20 YOU MAY ANSWER.

21 THE WITNESS: THAT'S INFORMATION REFERRAL
22 DIRECTLY TO A CLIENT INQUIRING ABOUT A SERVICE THAT HE OR
23 SHE MIGHT BE INTERESTED IN.

24 BY MS. BARCLAY:

25 Q. HOW DOES THAT DIFFER FROM THE DHS REFERRAL TO AN

1 AGENCY?

2 A. A DHS REFERRAL IS FOR A PARTICULAR HARD SERVICE,
3 FOSTER-CARE, GROUP HOME, THAT KIND OF THING. THE OTHER
4 ONE IS MORE OF A QUERY ABOUT WHERE WILL I BE BEST
5 SERVED.

6 Q. I WANT TO TALK TO YOU NOW ABOUT THIS PARTICULAR
7 LITIGATION, MR. AMATO. WHEN DID YOU FIRST LEARN THAT
8 THE CITY HAD CONCERNS ABOUT CATHOLIC SOCIAL SERVICES'
9 RELIGIOUS BELIEFS?

10 THE COURT: I DON'T KNOW THAT THAT IS
11 PROPERLY PHRASED.

12 MS. BARCLAY: I CAN REPHRASE IT, YOUR HONOR.

13 THE COURT: OKAY.

14 BY MS. BARCLAY:

15 Q. WHEN DID YOU FIRST LEARN THAT THE CITY HAD
16 CONCERNS ABOUT CATHOLIC SOCIAL SERVICES' RELIGIOUS
17 BELIEFS WITH RESPECT TO WRITTEN CERTIFICATIONS THAT CAN
18 PROVIDE TO SAME-SEX COUPLES?

19 MR. FIELD: OBJECTION, YOUR HONOR.

20 THE COURT: AGAIN, YOU ARE PUTTING IN THERE
21 "RELIGIOUS BELIEFS." I DON'T THINK THAT THAT IS THE ISSUE.
22 THE ISSUE IS WHETHER OR NOT THEY WERE GOING TO BE CERTIFIED.

23 MS. BARCLAY: I CAN REPHRASE IT AGAIN, YOUR
24 HONOR.

25 THE COURT: YES.

1 MS. BARCLAY: IF YOU CAN WAIT ONE MOMENT.

2 BY MS. BARCLAY:

3 Q. OKAY. WHEN DID YOU FIRST LEARN ABOUT THE CITY'S
4 CONCERN WITH THE HYPOTHETICAL SITUATION WHERE CATHOLIC
5 SOCIAL SERVICES WOULD BE UNABLE TO PROVIDE WRITTEN
6 CERTIFICATION FOR SAME-SEX COUPLES?

7 A. IN MID MARCH FOLLOWING AN EVENT, A PROMOTION
8 THAT THE CITY HELD, DHS HELD, FOR 300 MORE FOSTER
9 FAMILIES, I GOT A CALL ON MY CELL PHONE, I THINK IT WAS
10 A FRIDAY AFTERNOON, FROM COMMISSIONER FIGUEROA AND FIRST
11 DEPUTY SHAPIRO INQUIRING AS TO CATHOLIC SOCIAL SERVICES'
12 POSITION ON PROVIDING HOME STUDIES TO SAME-SEX
13 INDIVIDUALS OR COUPLES.

14 Q. AND WHAT WAS COMMISSIONER FIGUEROA ASKING YOU?

15 A. SHE WAS ASKING ME WHETHER WE DO THAT.

16 Q. WHETHER WE DO WHAT?

17 A. WHETHER WE WOULD COMPLETE A HOME STUDY ON A
18 SAME-SEX COUPLE OR INDIVIDUAL.

19 Q. WHAT WAS YOUR RESPONSE?

20 A. MY ANSWER WAS NO, THAT WE WOULD NOT DO THAT,
21 THAT IT'S AGAINST THE TEACHINGS OF THE CHURCH.

22 Q. DID THEY SAY ANYTHING TO YOU THEN IN RESPONSE?

23 A. THEY SAID TO ME THAT YOU ARE DISCRIMINATING. I
24 SAID THAT I AM FOLLOWING THE TEACHINGS OF THE CATHOLIC
25 CHURCH.

1 Q. AND THIS WAS A PHONE CALL IN MID MARCH?

2 A. IT WAS A PHONE CALL IN MID MARCH, YES.

3 Q. DID YOU HAVE A FOLLOWUP IN-PERSON CONVERSATION?

4 A. THERE WAS A MEETING THE NEXT WEEK WITH DHS
5 SENIOR MANAGEMENT, CATHOLIC SOCIAL SERVICES SENIOR
6 MANAGEMENT, AND ARCHDIOCESAN LEGAL COUNSEL.

7 Q. WHAT WERE THE THINGS THAT DHS SENIOR MANAGEMENT
8 COMMUNICATED TO YOU AT THAT MEETING?

9 A. THEIR GREAT CONCERNS ABOUT US NOT COMPLETING
10 HOME STUDIES FOR SAME-SEX INDIVIDUALS AND COUPLES, THE
11 FACT THAT THIS HAD THE HIGHEST ATTENTION, THE ATTENTION
12 AT THE HIGHEST LEVELS OF GOVERNMENT IN THE CITY, AND
13 THAT --

14 MR. FIELD: YOUR HONOR, HEARSAY.

15 THE COURT: OVERRULED.

16 MS. BARCLAY: THIS IS AN ADMISSIBLE PARTY
17 ADMISSION.

18 THE WITNESS: AND AN INDICATION THAT CATHOLIC
19 SOCIAL SERVICES SHOULD BE FOLLOWING THE TEACHINGS OF POPE
20 FRANCIS RATHER THAN THE ARCHDIOCESE -- RATHER THAN THE
21 ARCHBISHOP OR THE ARCHDIOCESE.

22 BY MS. BARCLAY:

23 Q. DID THE CITY SAY ANYTHING ABOUT TIMES CHANGING?

24 A. YES, WHERE THEY INDICATED WHEN I --

25 MR. FIELD: OBJECTION. LEADING, YOUR HONOR.

1 THE COURT: OVERRULED.

2 THE WITNESS: WHEN I INDICATED THAT THE
3 MISSION COMMITMENT EXPRESSED IN OVER 100 YEARS OF SERVICES,
4 I WAS ADVISED THAT TIMES HAVE CHANGED, ATTITUDES HAVE
5 CHANGED, SCIENCE HAS CHANGED. IT'S TIME FOR -- THE IMPLICIT
6 MESSAGE WAS IT'S TIME FOR THE CATHOLIC CHURCH -- CATHOLIC
7 SOCIAL SERVICES TO CHANGE.

8 BY MS. BARCLAY:

9 Q. AND JUST TO CONFIRM, I APOLOGIZE YOU WERE
10 INTERRUPTED BEFORE. WHAT DID THEY SAY ABOUT THE TOP
11 CITY OFFICIALS?

12 A. WITHOUT NAMING NAMES, THEY INDICATED THAT IT HAD
13 THE ATTENTION OF TOP LEVELS OF GOVERNMENT, WHICH I WOULD
14 ASSUME WOULD BE MAYOR KENNEY AND CITY COUNCIL.

15 MR. FIELD: OBJECTION, CALLS FOR SPECULATION.

16 THE COURT: SUSTAINED.

17 MS. BARCLAY: THAT'S FINE, YOUR HONOR.

18 BY MS. BARCLAY:

19 Q. THE SUBSTANCE OF THAT MEETING, WAS THAT
20 INQUIRING ABOUT ANYTHING ELSE RELEVANT TO CATHOLIC
21 SOCIAL SERVICES?

22 A. NO. IT WAS STRICTLY AROUND THE MATTER THAT WE
23 JUST DISCUSSED.

24 Q. DID THEY ASK ABOUT -- DID THEY TELL YOU IN THAT
25 MEETING THAT THERE WOULD BE A REFERRAL FREEZE?

1 A. SURPRISINGLY, NO. AND IT WAS KIND OF ODD TO GET
2 A CALL FIVE MINUTES LATER WHEN WE WERE WALKING BACK TO
3 THE ARCHDIOCESE FROM DEPUTY COMMISSIONER ALI, TELLING US
4 THAT WE FORGOT TO MENTION SOMETHING, YOUR REFERRALS
5 WOULD BE FROZEN.

6 Q. SO THAT WAS TEN MINUTES AFTER THE IN-PERSON
7 MEETING?

8 A. CORRECT, YES.

9 Q. SO I WILL GO BACK TO THAT. YOU MENTIONED THERE
10 WAS SOME DISCUSSION OF THE POPE FROM DHS AT THAT
11 MEETING. DO YOU REMEMBER EXACTLY WHAT THEY SAID ABOUT
12 THE POPE?

13 THE COURT: WHO SAID?

14 BY MS. BARCLAY:

15 Q. IT WAS COMMISSIONER FIGUEROA, CORRECT?

16 A. IT WAS.

17 Q. WHAT DID COMMISSIONER FIGUEROA SAY ABOUT THE
18 POPE?

19 A. THAT WE SHOULD BE LISTENING MORE TO POPE FRANCIS
20 THAN THE ARCHBISHOP AND THE ARCHDIOCESE'S POSITION ON
21 THIS.

22 Q. SO MOVING FORWARD AGAIN TO WHEN YOU RECEIVED
23 THAT FOLLOW-UP PHONE CALL ABOUT THE REFERRAL FREEZE, WHO
24 WAS ON THE PHONE 10 MINUTES LATER FOR THAT FOLLOW-UP
25 PHONE CALL?

1 A. DEPUTY COMMISSIONER ALI.

2 Q. JUST COMMISSIONER ALI?

3 A. YES.

4 Q. AND DID SHE EXPLAIN WHY THERE WAS GOING TO BE A
5 REFERRAL FREEZE?

6 A. NO. IT WAS PRETTY SHORT AND TO THE POINT, AND
7 IT WAS BASED ON THE MEETING. WE FORGET TO MENTION THAT,
8 SO WE ARE MENTIONING IT TO YOU NOW.

9 Q. DID THEY INDICATE THAT THERE WOULD BE ANY SORT
10 OF EXCEPTION FOR THE BEST INTERESTS OF CHILDREN TO THIS
11 REFERRAL FREEZE AT THIS TIME?

12 A. NO. IT WAS ABSOLUTE, NO REFERRALS AND NO TALK
13 OF ANY EXCEPTIONS.

14 Q. SO IS YOUR -- WHAT IS YOUR UNDERSTANDING AS FAR
15 AS THE SOLE REASON FOR THIS REFERRAL FREEZE?

16 A. THAT CATHOLIC SOCIAL SERVICES IN ITS STATEMENTS
17 HAD SAID THEY WOULD NOT GO FORWARD WITH THE HOME
18 STUDIES, COMPLETING HOME STUDIES FOR SAME-SEX
19 INDIVIDUALS AND COUPLES.

20 Q. BEFORE THIS LAWSUIT HAVE YOU EVER HEARD TO --
21 SERVICES PROVIDING A HOME STUDY DESCRIBED AS A PUBLIC
22 ACCOMMODATION?

23 A. NEVER HEARD OF THAT BEFORE.

24 Q. HAD YOU EVER HEARD OF FOSTER-CARE GENERALLY
25 BEING DESCRIBED AS A PUBLIC ACCOMMODATION?

1 A. NO.

2 Q. WHEN WAS THE FIRST TIME YOU HEARD OF FOSTER-CARE
3 BEING DESCRIBED IN THAT WAY?

4 A. WHEN I WENT TO THAT MEETING WITH THE
5 COMMISSIONER. SHE WAS QUOTING THAT FROM THE CONTRACT.

6 Q. WHAT DID THE COMMISSIONER SAY ABOUT PUBLIC
7 ACCOMMODATIONS IN THAT MEETING?

8 A. BASICALLY A PUBLIC ACCOMMODATION IS ANYTHING
9 THAT GETS PUBLIC FUNDING. SO IF YOU GET PUBLIC FUNDING,
10 YOU HAVE TO FOLLOW THROUGH WITH THAT EXPECTATION.

11 Q. IT WAS THEIR POSITION THAT YOU WERE NOT
12 COMPLYING WITH THE PUBLIC ACCOMMODATION REQUIREMENTS?

13 A. THAT WAS THEIR POSITION.

14 Q. AND WAS THEIR POSITION THAT YOU NEEDED TO DO
15 HOME STUDY FOR ANYONE THAT APPLIED?

16 A. YES.

17 Q. COMMISSIONER FIGUEROA'S DECLARATION CLAIMS THAT
18 YOU TOLD HER CSS, QUOTE, "COULD NOT COMPLY WITH ITS
19 CONTRACT," END QUOTE. SHE USES THAT PHRASING TWICE.
20 DID YOU SAY THAT TO HER?

21 A. NOT TO MY KNOWLEDGE OR RECOLLECTION.

22 Q. WHAT DID YOU SAY?

23 A. I SAID THAT CATHOLIC SOCIAL SERVICES, DUE TO ITS
24 RELIGIOUS TEACHINGS, WOULD NOT MOVE FORWARD WITH A HOME
25 STUDY FOR A SAME-SEX COUPLE, BUT WOULD IMMEDIATELY REFER

1 THAT COUPLE TO ONE OF THE OTHER 28 OR SO AGENCIES WHO
2 WOULD COMPLETE SUCH A HOME STUDY.

3 Q. WHEN DID YOU FIRST LEARN THAT EXCEPTIONS MIGHT
4 BE GRANTED FOR CHILDREN TO BE PLACED WITH CATHOLIC
5 SOCIAL SERVICES IN THE BEST INTEREST OF THE CHILD?

6 A. I AM GOING TO SAY ROUGHLY AROUND MARCH 25 A
7 REFERRAL CAME TO OUR FOSTER-CARE DEPARTMENT, AND I WAS
8 IMMEDIATELY NOTIFIED THAT REFERRAL IS FROM A CUA. I
9 BELIEVE IT WAS AN EMERGENCY SITUATION WHERE A SIBLING OF
10 TWO CHILDREN BEING IN A CATHOLIC SOCIAL SERVICES HOME
11 NEEDED TO BE PLACED, AND IT WAS THAT THEY -- THE REQUEST
12 WAS THAT HE BE PLACED WITH HIS SIBLINGS AT OUR
13 CSS-APPROVED HOME.

14 MS. BARCLAY: JUST ONE MOMENT, YOUR HONOR.
15 PERMISSION TO APPROACH THE WITNESS, YOUR
16 HONOR.

17 THE COURT: YES.

18 BY MS. BARCLAY:

19 Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS
20 BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 8. CAN YOU
21 TELL US WHAT THIS DOCUMENT IS?

22 A. I DIDN'T HEAR YOU.

23 Q. CAN YOU TELL US WHAT THIS DOCUMENT IS?

24 A. IT'S AN E-MAIL FROM ME TO COMMISSIONER FIGUEROA,
25 ADVISING HER THAT THE REFERRAL WAS MADE FOR [REDACTED]

1 ████████ TO BE PLACED IN A CSS FOSTER HOME THAT NOW HAS
2 HIS SIBLINGS.

3 MR. FIELD: OBJECTION. YOUR HONOR, THEY ARE
4 TALKING ABOUT THE NAME OF THE CHILDREN WHO ARE IN THE CITY'S
5 FOSTER-CARE. I'D ASK THAT THE EXHIBIT BE WITHDRAWN FROM THE
6 RECORD.

7 THE COURT: WE WILL REDACT IT.

8 MR. FIELD: AND STRICKEN.

9 MS. BARCLAY: NO OBJECTION, YOUR HONOR?
10 BY MS. BARCLAY:

11 Q. TO THE EXTENT YOU ARE DESCRIBING THIS CHILD,
12 WOULD YOU REFER TO THE CHILD AS DOE FOSTER CHILD NUMBER
13 2?

14 A. I WILL.

15 Q. WILL YOU DESCRIBE AGAIN WHAT THIS DOCUMENT IS?

16 A. AN E-MAIL TO THE COMMISSIONER INDICATING THAT IT
17 RECEIVED A NET CUA REFERRAL ON DOE CHILD 2 TO BE
18 REUNITED WITH HIS SIBLINGS WHO ARE IN A CSS FOSTER HOME
19 AND THAT DOE CHILD 2 NEEDED AN EMERGENCY PLACEMENT, WITH
20 MY UNDERSTANDING. I INDICATED THAT WE ACCEPTED THE
21 REFERRAL AS -- WITH THE IDEA THAT IT'S IN THE BEST
22 INTEREST OF THE CHILD TO BE WITH HIS SIBLINGS AND ASKED
23 IF SHE HAD ANY QUESTIONS.

24 Q. NOW, A FEW DAYS LATER IN MARCH, THERE WAS
25 ANOTHER E-MAIL FROM COMMISSIONER ALI. WERE YOU A

1 RECIPIENT OF THAT E-MAIL?

2 A. I WAS.

3 Q. WHAT DID YOU UNDERSTAND TO BE THE MEANING OF
4 THAT E-MAIL?

5 A. MY UNDERSTANDING WAS IT WAS A CLEAR AND CONCISE
6 AND DIRECT ORDER TO ALL OF THE CUA'S TO CEASE AND DESIST
7 ANY REFERRALS TO CATHOLIC OR BETHANY.

8 Q. NOW WHO MADE THIS REFERRAL FOR DOE FOSTER CHILD
9 NUMBER 2 TO CATHOLIC SOCIAL SERVICES?

10 A. MY UNDERSTANDING IS THE INQUIRY WAS MADE BY THE
11 NET OR NORTHEAST TREATMENT CUA TO US, AND THAT THE
12 NECESSARY -- AND THIS IS SPECULATION -- AND THAT THE
13 CENTRAL REFERRAL UNIT OF THE CITY APPROVED OF THIS
14 PLACEMENT.

15 Q. I JUST WANT TO MAKE SURE SOMETHING THAT YOU SAID
16 EARLIER. YOU TALKED ABOUT THE REASON FOR THE REFERRAL
17 FREEZE AND WHAT CATHOLIC SOCIAL SERVICES' RELIGIOUS
18 OBJECTIONS WERE, RIGHT? DOES CATHOLIC SOCIAL SERVICES
19 PLACE CHILDREN WITH INDIVIDUALS AND PROVIDE HOME STUDY
20 FOR JUST SINGLE PARENT?

21 A. FOR ANY FAMILY WHO APPROACHES US FOR --

22 Q. FOR A SINGLE PARENT, COULD THEY HAVE A HOME
23 STUDY PERFORMED?

24 A. YES.

25 Q. DOES IT MATTER WHAT THE SEXUAL ORIENTATION IS OF

1 A SINGLE INDIVIDUAL?

2 A. A SEXUAL ORIENTATION OF THE INDIVIDUAL IS NOT
3 THE PART AND PARCEL OF WHAT THE HOME STUDY PROCESS IS
4 ABOUT.

5 Q. SO AN INDIVIDUAL SINGLE GAY PERSON COULD BE A
6 FOSTER PARENT WITH CATHOLIC SOCIAL SERVICES?

7 A. YES.

8 Q. IS THE OBJECTION ONLY WHEN CATHOLIC SOCIAL
9 SERVICES IS BEING REQUIRED TO EVALUATE AND PROVIDE
10 WRITTEN ENDORSEMENTS OF A SAME-SEX RELATIONSHIP?

11 A. YES, IT IS.

12 THE COURT: WRITTEN ENDORSEMENTS?

13 BY MS. BARCLAY:

14 Q. DO YOU VIEW THE HOME STUDY AND WHAT CULMINATES
15 AT THE END OF THE HOME STUDY AS A WRITTEN ENDORSEMENT AS
16 A RELATIONSHIP TO THE GOVERNMENT?

17 A. I THINK SO, YES.

18 Q. WHY DID YOU FILE THIS LAWSUIT? WAS THIS YOUR
19 FIRST PREFERENCE?

20 A. NO. OUR FIRST PREFERENCE WAS TO WORK OUT A
21 REASONABLE ACCOMMODATION WITH THE CITY. BUT UPON
22 HEARING THAT SUBPOENAS WERE SOON TO BE ISSUED, AN
23 INQUIRY COMING FROM THE PHILADELPHIA COMMISSION FOR
24 HUMAN RELATIONS, IT SEEMED LIKE OUR ONLY RECOURSE WAS TO
25 GO THIS ROUTE.

1 Q. WELL, WHAT WERE SOME OF THE THINGS THAT YOU DID
2 BEFORE FILING THE LAWSUIT TO SEE IF YOU COULD WORK THIS
3 OUT, AS YOU SAID?

4 A. WELL, WE SHOWED AN INTEREST IN FINDING SOME KIND
5 OF MIDDLE GROUND. WE WORKED WITH BECKET TO SHOW THAT
6 INTEREST, AND THERE WAS AN E-MAIL TO THE CITY INDICATING
7 THAT WE WOULD LIKE TO HAVE A MEETING TO SEE IF SOME SORT
8 OF ACCOMMODATION COULD BE WORKED OUT, BUT THE ANSWER WAS
9 CLEAR AND CRISP. AND THE ANSWER WAS NO, THERE IS NO
10 REASON FOR A MEETING, EITHER DO THE HOME STUDIES OR WE
11 WILL BE TRANSITIONING YOU GRADUALLY OUT OF FOSTER-CARE.

12 Q. DID YOU ASK FOR MULTIPLE MEETINGS WITH DHS?

13 A. NO.

14 Q. DID YOU ASK ON MORE THAN ONE OCCASION FOR
15 MEETINGS WITH DHS?

16 A. NOT TO MY RECOLLECTION.

17 Q. YOU DON'T RECALL?

18 A. NO, I DON'T RECALL THAT.

19 MS. BARCLAY: PERMISSION TO APPROACH THE
20 WITNESS, YOUR HONOR.

21 THE COURT: YES.

22 BY MS. BARCLAY:

23 Q. MR. AMATO, I AM APPROACHING WITH YOU WHAT HAS
24 BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 9. DO YOU
25 RECOGNIZE THIS DOCUMENT, MR. AMATO?

1 A. I DO.

2 Q. WHAT IS THE DATE OF THIS DOCUMENT?

3 A. MAY 7, 2018.

4 Q. WAS THERE SOMETHING ABOUT THIS DOCUMENT IN
5 PARTICULAR THAT MADE YOU DECIDE THAT CATHOLIC SOCIAL
6 SERVICES WOULD NEED TO FILE A LAWSUIT?

7 A. WELL, WHAT I RECALL OF THIS DOCUMENT IS
8 SOMEWHERE IN THE -- IN THE DOCUMENT IS MR. RIENZI ASKING
9 THE CITY FOR A MEETING TO SEE IF WE CAN COME UP WITH A
10 SOLUTION, AND -- IF I AM RECALLING THIS AS THE CORRECT
11 LETTER.

12 Q. LET ME PAUSE YOU THERE. THIS DOCUMENT IS NOT
13 WRITTEN BY MR. RIENZI. IT'S WRITTEN TO MR. RIENZI BY
14 THE CITY OF PHILADELPHIA. DO YOU RECALL ANY DISCUSSION
15 IN THIS LETTER ABOUT SUBPOENAS?

16 A. ABOUT WHAT?

17 Q. SUBPOENAS FROM THE CITY.

18 A. WHAT I RECALL FROM THIS LETTER IS, IT WAS -- IT
19 WAS A RESPONSE TO MR. RIENZI'S CALL FOR A MEETING TO
20 COME UP WITH AN ALTERNATE SOLUTION, AND THE LETTER
21 INDICATED THAT THERE IS NO SOLUTION THAT CAN BE HAD
22 OTHER THAN COMPLETE THE HOME STUDIES AS WE HAVE MANDATED
23 OR SUBPOENAS WILL BE FORTHCOMING. SO AT THAT POINT, OUR
24 BEST RECOURSE AND ONLY RECOURSE WAS A FEDERAL LAWSUIT.

25 Q. I WANT TO DIRECT YOUR ATTENTION TO THE LAST

1 SENTENCE OF THIS LETTER BEFORE THE SIGNATURE. IT SAYS:
2 THEREFORE WE REITERATE THE REQUEST FOR INFORMATION SET
3 FORTH IN THAT LETTER AND WE ASK YOU TO RESPOND WITHIN
4 TEN DAYS OF THIS LETTER TO AVOID THE ISSUANCE OF A
5 SUBPOENA.

6 DID I READ THAT CORRECTLY?

7 A. YES.

8 Q. SO HOW LONG AFTER MAY 7 WAS IT APPROXIMATELY
9 THAT YOU FILED YOUR LAWSUIT?

10 A. MY RECOLLECTION IS ABOUT NINE DAYS LATER.

11 Q. NOW, THE ATTORNEYS FOR THE CITY HAVE ACCUSED YOU
12 OF NEEDLESSLY MAKING --

13 MR. FIELD: OBJECTION, YOUR HONOR.

14 THE COURT: TO THE TERM "ACCUSE."

15 MS. BARCLAY: YES, YOUR HONOR.

16 BY MS. BARCLAY:

17 Q. MR. AMATO, LET ME REPHRASE MY QUESTION. THE
18 ATTORNEYS FOR THE CITY HAVE STATED THAT YOU NEEDLESSLY
19 MADE THE DOE FOSTER CHILD NUMBER 1 SITUATION PART OF
20 THIS LAWSUIT, THAT YOU ENTANGLED IT IN THIS LAWSUIT.
21 WHY DID YOU DECIDE --

22 MR. FIELD: OBJECTION, YOUR HONOR. THIS
23 LETTER IS NOT FROM AN ATTORNEY FOR THE CITY.

24 MS. BARCLAY: YOUR HONOR, I AM NO LONGER
25 TALKING ABOUT THE LETTER.

1 THE COURT: ASK YOUR QUESTION AGAIN, PLEASE.

2 BY MS. BARCLAY:

3 Q. THE ATTORNEYS FOR THE CITY HAVE ACCUSED YOU OF
4 NEEDLESSLY MAKING DOE FOSTER CHILD NUMBER 1 SITUATION
5 PART OF THIS LAWSUIT AND ENTANGLING THAT WITH THIS
6 LAWSUIT. WHY DID YOU DECIDE THAT ADDITIONAL FACTS
7 RELEVANT TO THE DOE FOSTER CHILD NUMBER 1 SITUATION
8 NEEDED TO BE COMMUNICATED TO THE CITY THROUGH YOUR
9 ATTORNEYS AND THIS LITIGATION?

10 MR. FIELD: YOUR HONOR, I OBJECT TO THE
11 CHARACTERIZATION OF THE CITY'S REPRESENTATION. THOSE WORDS
12 CHANGE BETWEEN LITIGATION COUNSEL AND THIS LITIGATION.

13 MS. BARCLAY: YOUR HONOR, MAY I PULL OUT THE
14 CHARACTERIZATION OF THE BRIEF?

15 THE COURT: WELL, AGAIN, JUST ASK THE SIMPLE
16 QUESTION.

17 MS. BARCLAY: YES, YOUR HONOR.

18 BY MS. BARCLAY:

19 Q. WHY DID YOU DECIDE THAT THE ADDITIONAL FACTS YOU
20 LEARNED ABOUT THE DOE FOSTER CHILD NUMBER 1 SITUATION
21 NEEDED TO BE COMMUNICATED THROUGH LITIGATION COUNSEL TO
22 THE CITY?

23 A. BECAUSE ON MAY 25TH WHEN IT WAS DISCOVERED BY
24 OUR CUA WORKER THAT DOE CHILD NUMBER 2 NEEDED AN
25 EMERGENCY PLACEMENT AND OUR -- HIS PREVIOUS FOSTER HOME

1 WAS OFFERED AS AN EMERGENCY PLACEMENT, THE ANSWER FROM
2 THE LINE WORKER AFTER CHECKING WITH HIS SUPERVISORS WAS
3 THAT THE -- THE REFERRAL WOULD NOT BE ALLOWED BECAUSE OF
4 THE CASE AGAINST THE CATHOLIC SOCIAL SERVICES.

5 Q. AND WHEN YOU TALKED ABOUT THE LINE WORKER, YOU
6 ARE REFERRING TO A DHS WORKER, CORRECT?

7 A. YES, AND THE CUA.

8 Q. WHAT DOES THAT INDICATE TO YOU ABOUT THAT DENIAL
9 AND WHY COMMUNICATIONS NEEDED TO BE PART OF THIS
10 LITIGATION?

11 A. WELL, THEY TIED THE DENIAL TO THE CASE AGAINST
12 CATHOLIC SOCIAL SERVICES.

13 MR. FIELD: OBJECTION, YOUR HONOR, THIS IS
14 HEARSAY.

15 MS. BARCLAY: YOUR HONOR, THIS IS NOT BEING
16 OFFERED FOR THE TRUTH OF THE MATTER ASSERTED, BUT BECAUSE
17 THE CATHOLIC SOCIAL SERVICES' MOTIVES FOR BRINGING UP THE
18 DOE FOSTER CHILD NUMBER 1 SITUATION HAS BEEN CALLED IN
19 QUESTION, THIS IS RELEVANT TO ADDRESS WHAT HIS MOTIVES WERE
20 AS FAR AS THOSE COMMUNICATIONS.

21 THE COURT: OVERRULED. YOU STARTED TO
22 ANSWER.

23 BY MS. BARCLAY:

24 Q. YOU CAN START AGAIN, MR. AMATO. WHAT -- DO YOU
25 NEED ME TO REPEAT THE QUESTION?

1 A. PLEASE.

2 Q. SO WHAT DID THAT DENIAL BY DHS INDICATE TO YOU
3 AS FAR AS WHY THOSE COMMUNICATIONS NEEDED TO BE MADE AS
4 PART OF THIS LITIGATION?

5 A. THE DENIAL INDICATED TO ME THAT THE SOLE REASON
6 FOR THE LACK OF WHAT WAS A VERY SOLID PLAN FOR DOE
7 NUMBER 1 CHILD WAS NEGATED BECAUSE OF THE CASE AGAINST
8 CATHOLIC SOCIAL SERVICES AND THE FREEZE ON ADMISSION.
9 SO I THOUGHT IT IMPERATIVE TO TAKE THIS THROUGH LEGAL
10 COUNSEL BECAUSE IT WAS CLEAR TO ME THAT IT WAS IN THE
11 BEST INTERESTS OF THE CHILD TO BE REUNITED WITH HIS CSS
12 FOSTER MOTHER.

13 MS. BARCLAY: JUST A MOMENT, MR. AMATO.
14 PERMISSION TO APPROACH THE WITNESS, YOUR
15 HONOR.

16 THE COURT: YES.

17 MS. BARCLAY: AND FOR CLARITY I AM GOING TO
18 APPROACH THE WITNESS WITH BOTH THE REDACTED AND UNREDACTED
19 VERSION OF THE DOCUMENT.

20 THE COURT: YES.

21 BY MS. BARCLAY:

22 Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS
23 BEEN MARKED AS PLAINTIFF'S EXHIBITS 10 AND 11. MR.
24 AMATO, I AM GOING TO READ TO YOU A REDACTED VERSION. IT
25 SAYS ABOUT THE 4TH PARAGRAPH DOWN: DHS TOLD THE CUA

1 WORKER NO SINCE DHS IS REFUSING TO SEND REFERRALS TO
2 CSS. SO IS THIS THE DENIAL THAT YOU ARE REFERRING TO
3 THAT LED YOU TO ARRIVE AT THIS CONCLUSION?

4 A. YES, IT IS.

5 Q. WHY DIDN'T YOU ROUTE THIS ISSUE THROUGH THE
6 NORMAL FAMILY COURT PROCESS?

7 A. BECAUSE OF THE COMPLEXITY OF THE ACTION TAKEN
8 AGAINST CATHOLIC SOCIAL SERVICES, BECAUSE OF THE URGENT
9 NEEDS OF THE CHILD TO BE SERVED, I THOUGHT THAT THIS
10 MATTER WAS OUTSIDE THE REALM OF WHAT FAMILY COURTS
11 TRADITIONALLY HANDLES.

12 Q. DID YOU THINK THAT THERE WERE ANY EXCEPTIONAL
13 CIRCUMSTANCES AT ISSUE HERE?

14 A. ABSOLUTELY. WE HAVE A VERY YOUNG CHILD [REDACTED]
15 [REDACTED] WHO WAS MOVED FROM RESPITE HOME TO RESPITE
16 HOME, [REDACTED] AND A
17 FOSTER MOTHER WHO DIRELY WANTED HER BACK --

18 MR. FIELD: YOUR HONOR, I OBJECT TO PUTTING
19 DETAILS ABOUT THE FOSTER CHILD IN THE CITY'S CARE IN THE
20 RECORD.

21 BY MS. BARCLAY:

22 Q. IF YOU CAN LIMIT YOUR RESPONSE, MR. AMATO, TO
23 THE LIMITED THINGS WITHOUT GOING INTO DETAIL THAT WERE
24 THE EXCEPTIONAL CIRCUMSTANCES THAT YOU THOUGHT WARRANTED
25 NOT ROUTING THIS THROUGH NORMAL FAMILY COURT PROCESS.

1 MR. FIELD: YOUR HONOR, IF I CAN ASK THAT THE
2 MEDICAL DETAILS BE STRICKEN.

3 THE COURT: YES, THEY WILL BE STRICKEN.

4 THE WITNESS: THEN IT -- ABSENT THAT, IT WAS
5 THE FACT THAT HE WAS IN A RESPITE FOR TWO DAYS, FOR A
6 WEEKEND, AND HE WAS GOING TO GET MOVED TO ANOTHER RESPITE
7 HOME. AND DURING THAT SAME TIME, IT WAS CLEAR TO MANY
8 INDIVIDUALS THAT HIS CSS FOSTER MOTHER WELCOMED HIM BACK.
9 AND LATER ON IN THE WEEK, WE FOUND OUT HAD ALSO SPOKEN TO
10 HER FAMILY AND HAD BEEN -- [REDACTED]
11 [REDACTED] [REDACTED]

12 BY MS. BARCLAY:

13 Q. WAS THERE ANYTHING IN PARTICULAR THAT YOU
14 THOUGHT WAS EXCEPTIONAL ON MAY 25TH ABOUT THE OPTIONS
15 THAT WERE AVAILABLE AT THAT TIME AND THE DENIAL OF THAT
16 FOSTER MOTHER?

17 A. I THOUGHT IT WAS PARTICULARLY RELEVANT IN THESE
18 SITUATIONS. THE OPTIONS, GRIMLY, ARE NOT MUCH, AND IT
19 WOULD HAVE BEEN AN OVERNIGHT IN THE DHS CHILDCARE ROOM,
20 AN EMERGENCY SHELTER, OR WHAT WE HAD OFFERED WITH THE
21 CSS FOSTER HOME. SO THAT OPTION WAS JUST A FAR BETTER
22 OPTION.

23 Q. AND IN YOUR NORMAL EXPERIENCE WITH PLACEMENT,
24 WOULD A FORMER FOSTER MOTHER EVER BE DENIED IN THE BEST
25 INTEREST OF A CHILD?

1 A. NEVER, PARTICULARLY WHEN THE FOSTER MOTHER IS IN
2 SUCH GOOD STANDING AS THIS FOSTER MOTHER IS.

3 Q. DO YOU RECALL WHEN YOUR ATTORNEYS FIRST
4 COMMUNICATED WITH DHS ABOUT THOSE ADDITIONAL FACTS?

5 A. I BELIEVE EARLY IN THE FOLLOWING WEEK OUR
6 ATTORNEYS COMMUNICATED WITH DHS, INDICATING CLEARLY THE
7 POSITION OF OUR FOSTER MOTHER AND THE WELCOME NEWS OF
8 HER INTENT AND INTEREST IN ADOPTING DOE 2.

9 MS. BARCLAY: PERMISSION TO APPROACH THE
10 WITNESS, YOUR HONOR.

11 THE COURT: YES.

12 BY MS. BARCLAY:

13 Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS
14 BEEN MARKED AS PLAINTIFF'S EXHIBIT NUMBER 12. THIS IS
15 AN E-MAIL FROM LORI WINDHAM TO MR. FIELD. AND SHE SAYS:
16 BEN, THANKS FOR YOUR E-MAIL. WE WILL TAKE A LOOK AT THE
17 SOURCES YOU PROVIDED -- PROPOSED REDACTIONS. IN THE
18 MEANTIME, THOUGH, WE STILL HAVE A CHILD STUCK IN RESPITE
19 CARE AND KEPT FROM A PRE-ADOPTIVE HOME. I STATED ON
20 MONDAY I WOULD FACILITATE THE NECESSARY CONVERSATIONS
21 WITH MY CLIENTS, AND I RECEIVED NO OUTREACH REGARDING
22 THAT. WHEN WILL THE CITY BE ACTING ON THIS MATTER?

23 SO MY QUESTION TO YOU IS PRIOR TO
24 RECEIVING -- PRIOR TO SENDING THIS E-MAIL, WERE YOU
25 AWARE OF THE CITY TRYING TO MAKE OUTREACH TO COMMUNICATE

1 WITH YOU ABOUT THIS PARTICULAR SITUATION?

2 MR. FIELD: YOUR HONOR, I OBJECT. THE
3 WITNESS DID NOT SEND THIS E-MAIL OR WASN'T INVOLVED IN THIS
4 COMMUNICATION.

5 BY MS. BARCLAY:

6 Q. WAS THIS E-MAIL SENT AT YOUR DIRECTION, MR.
7 AMATO?

8 A. YES.

9 Q. SO PRIOR TO THIS E-MAIL BEING SENT, WERE YOU
10 AWARE OF THE CITY TRYING TO REACH OUT TO YOU TO ARRANGE
11 -- CONVERSATIONS WITH YOU ABOUT THIS CHILD?

12 A. NO.

13 THE COURT: COUNSEL, I AM GOING TO INTERRUPT
14 YOU AT THIS POINT AND ASK YOU WHAT IS THE RELEVANCE OF ALL
15 OF THIS, AS IT RELATES TO THE REQUEST FOR THE INJUNCTION?

16 MS. BARCLAY: WELL, THE RELEVANCE FOR ALL OF
17 THIS IS TO RESPOND TO SOME OF THE ARGUMENTS THAT THE CITY
18 HAS MADE, NUMBER ONE, THAT THE INTENT OF CATHOLIC SOCIAL
19 SERVICES WAS UNFOUNDED AS FAR AS THEIR NEED TO INVOLVE THE
20 DOE SITUATION AS PART OF THIS LAWSUIT AND COMMUNICATE ABOUT
21 THE DOE SITUATION AS PART OF THIS LAWSUIT AND THEY WERE
22 BEING DILATORY IN THEIR COMMUNICATION ABOUT THAT SITUATION.

23 THE COURT: I DON'T KNOW THAT IT WILL IMPACT
24 THIS COURT'S DECISION AS TO WHETHER OR NOT AN INJUNCTION IS
25 APPROPRIATE.

1 MS. BARCLAY: THERE IS ALSO CERTAINLY THE
2 QUESTION AS FAR AS THE ABILITY OF THIS SITUATION TO REPEAT
3 IN THE FUTURE AS LONG AS THIS REFERRAL FREEZE IS IN PLACE,
4 AND AS MR. AMATO HAS TESTIFIED, THERE IS NO CLEAR
5 INSTRUCTION TO DHS WORKERS OR TO CUA LEADERSHIP TO ENSURE
6 THESE SORT OF REFERRALS ARE SENT TO CATHOLIC SOCIAL
7 SERVICES, YOUR HONOR.

8 THE COURT: I DON'T KNOW THAT THIS GENTLEMAN
9 CAN TESTIFY. HE CAN TESTIFY AS TO WHAT HAPPENED, AND YOU
10 CAN MAKE THE ARGUMENT THAT IT MAY HAPPEN IN THE FUTURE OR
11 YOU DON'T WANT IT TO HAPPEN IN THE FUTURE. BUT I DON'T KNOW
12 THAT WE HAVE TO GO THROUGH THE WHOLE HISTORY OF HIS
13 COMMUNICATION IN REGARD TO THIS ONE YOUNG BOY.

14 MS. BARCLAY: THE COMMUNICATION -- SO COUNSEL
15 FOR THE CITY HAS OFFERED COMMUNICATION WITH THE ATTORNEYS IN
16 THEIR OWN EXHIBITS, YOUR HONOR, AND WE ARE PROVIDING THE
17 COMPLETE STORY ABOUT THE NARRATIVE THAT THEY HAVE MADE AT
18 ISSUE IN THEIR BRIEFING, AND THAT'S NUMBER ONE.

19 AND NUMBER TWO, MR. AMATO IS ABLE TO TESTIFY
20 ABOUT HIS CONCERN THAT THIS SORT OF SITUATION COULD REPEAT
21 IN THE FUTURE BASED ON THE CURRENT POLICY AND THE CURRENT
22 REFERRAL FREEZE.

23 THE COURT: HE ALREADY TESTIFIED TO THAT.

24 MS. BARCLAY: SO THAT'S HOW THIS IS RELEVANT,
25 YOUR HONOR, AS FAR AS THE NEED TO GRANT THE TRO.

1 THE COURT: I DON'T THINK WE HAVE TO GO ANY
2 FURTHER.

3 MS. BARCLAY: THIS IS THE END OF MY LINE OF
4 QUESTIONING ON THAT.

5 BY MS. BARCLAY:

6 Q. MR. AMATO, I WOULD LIKE TO SPEAK TO YOU ABOUT
7 THE VIABILITY OF THE CATHOLIC SOCIAL SERVICES FOSTER
8 PROGRAM MOVING FORWARD. DO YOU REGULARLY OR DO YOUR
9 STAFF REGULARLY REPORT FOSTER-CARE VACANCIES TO DHS?

10 A. YES.

11 Q. AND IS THAT A CONTRACT REQUIREMENT, AS FAR AS
12 YOU ARE AWARE?

13 A. I THINK IT'S A PERFORMANCE EXPECTATION. I DON'T
14 THINK IT'S A CONTRACT REQUIREMENT.

15 Q. BEFORE THE REFERRAL FREEZE, ON AVERAGE HOW MANY
16 VACANCIES WOULD CATHOLIC SOCIAL SERVICES HAVE AT ANY
17 GIVEN PERIOD OF TIME ACROSS ALL OF THEIR PROGRAMS?

18 A. FOUR OR FIVE.

19 Q. HOW MANY VACANCIES DO YOU ANTICIPATE THAT YOU
20 WILL HAVE BY THE END OF JUNE?

21 A. 35.

22 Q. IF YOU CONTINUE TO NOT RECEIVE REFERRALS, WHEN
23 WILL YOU HAVE TO START LAYING OFF EMPLOYEES?

24 A. IN MID JULY WE WILL BEGIN A VERY SAD PROCESS OF
25 STAFF REDUCTION.

1 Q. AND THAT'S IF YOU DO NOT CONTINUE TO RECEIVE
2 REFERRALS?

3 A. CORRECT.

4 Q. AND ON AVERAGE, HOW MANY REFERRALS WILL CATHOLIC
5 SOCIAL SERVICES RECEIVE A MONTH FROM DHS FOR FOSTER
6 CHILDREN?

7 A. NINE.

8 Q. IS IT YOUR EXPERIENCE THAT AFTER A CONTRACT
9 EXPIRED WITH DHS THAT FOSTER AGENCIES ARE ABLE TO
10 CONTINUE OPERATING UNDER THE PRIOR CONTRACT?

11 A. CAN YOU REPEAT THAT QUESTION, PLEASE.

12 Q. LET'S TALK, FOR EXAMPLE, IF THERE WAS NO
13 REFERRAL FREEZE GOING ON AND THIS CONTRACT WITH CATHOLIC
14 SOCIAL SERVICES HAS A TERM ENDING JUNE 30TH. IN A
15 TYPICAL SENSE, DOES THAT MEAN THAT RIGHT AT JUNE 30TH
16 YOU HAVE TO ENTER INTO ANOTHER CONTRACT, OR IS IT
17 TYPICAL FOR AN AGENCY TO OPERATE UNDER AN EXISTING
18 CONTRACT?

19 A. IT'S TYPICAL --

20 MR. FIELD: OBJECTION. SPECULATION, YOUR
21 HONOR.

22 THE COURT: OVERRULED.

23 BY MS. BARCLAY:

24 Q. YOU CAN ANSWER THE QUESTION.

25 A. IT'S TYPICAL THAT WE OPERATE UNDER AN EXISTING

1 CONTRACT. MANY OF OUR -- MANY YEARS OF CONTRACT WITH
2 THE CITY ARE NOT CONFORMED UNTIL WELL INTO THE FALL.

3 Q. SO FOR AN AMOUNT OF MONTHS YOU CAN JUST KEEP
4 OPERATING UNDER THE PREVIOUS CONTRACT?

5 A. YES.

6 Q. HOW MANY TOTAL STAFF RIGHT NOW WORK FOR THIS
7 PROGRAM?

8 A. 15.

9 Q. IF REFERRALS DO NOT CONTINUE, APPROXIMATELY HOW
10 LONG WILL IT BE UNTIL THE PROGRAM IS COMPLETELY CLOSED
11 DOWN?

12 A. IN A MATTER OF MONTHS.

13 Q. IF YOU CLOSE THE PROGRAM, HOW EASY WOULD IT BE
14 TO LATER COME BACK AND RECRUIT THE SAME TYPE OF STAFF?

15 A. IMPOSSIBLE.

16 MR. FIELD: CALLS FOR SPECULATION.

17 THE COURT: YES, SUSTAINED.

18 BY MS. BARCLAY:

19 Q. IS ONE OF THE HALLMARKS OF OUR PROGRAM THE
20 CONTINUITY OF THE EXISTING STAFF?

21 MR. FIELD: ASKED AND ANSWERED, YOUR HONOR.

22 THE COURT: SUSTAINED.

23 BY MS. BARCLAY:

24 Q. WOULD ONE OF THE HALLMARKS OF YOUR CURRENT
25 PROGRAM BE GONE IF YOU LATER REBUILD THAT WITHOUT YOUR

1 GREAT STAFF?

2 MR. FIELD: OBJECTION, CALLS FOR SPECULATION,
3 YOUR HONOR.

4 MS. BARCLAY: THAT'S NOT SPECULATIVE, YOUR
5 HONOR. IF THE CURRENT STAFF WERE GONE, WOULD THAT BE
6 RELEVANT TO WHETHER OR NOT THAT STRENGTH OF CATHOLIC SOCIAL
7 SERVICES WOULD BE AVAILABLE. AND THAT'S RELEVANT TO THE
8 HARM INQUIRY FOR A PRELIMINARY INJUNCTION --

9 THE COURT: OVERRULED.

10 MS. BARCLAY: -- RESTRAINING ORDER.

11 BY MS. BARCLAY:

12 Q. WOULD THAT HALLMARK OF YOUR PROGRAM BE GONE,
13 CONTINUITY OF THE STAFF?

14 A. ABSOLUTELY.

15 Q. IF YOU CLOSED YOUR PROGRAM, HOW EASY DO YOU
16 THINK IT WOULD BE TO REBUILD NETWORKS WITH FAMILY AND
17 THE RELATIONSHIP OF TRUST THAT YOU HAVE RIGHT NOW?

18 A. IT WOULD TAKE YEARS.

19 MS. BARCLAY: NO FURTHER QUESTIONS, MR.
20 AMATO.

21 YOUR HONOR, I WOULD LIKE TO MAKE SURE THAT I
22 FORMALLY MOVE ALL EXHIBITS INTO EVIDENCE THAT WE HAVE
23 DISCUSSED DURING THIS TESTIMONY.

24 THE COURT: VERY WELL.

25 MS. BARCLAY: THANK YOU.

1 MR. FIELD: YOUR HONOR, BEFORE I BEGIN, I
2 WOULD JUST LIKE TO CLARIFY ONE POINT. COUNSEL REFERRED TO
3 MOVING ALL EXHIBITS INTO EVIDENCE. I'D JUST LIKE TO CLARIFY
4 THAT THAT'S THE EXHIBITS INTRODUCED TO THE WITNESS AND NOT
5 AFFIDAVITS AND OTHER EXHIBITS THAT SHE DISCUSSED IN THE
6 PARTIES' FILINGS.

7 THE COURT: YES. IT'S P-1 THROUGH 13 -- NO,
8 12.

9 MR. FIELD: THANK YOU, YOUR HONOR.

10 (PLAINTIFF EXHIBITS 1 THROUGH 12 ADMITTED
11 INTO EVIDENCE.)

12 CROSS-EXAMINATION

13 BY MR. FIELD:

14 Q. MR. AMATO, THANK YOU FOR BEING HERE TODAY.
15 WOULD YOU LIKE ME TO CALL YOU MR. AMATO?

16 A. JIM WOULD BE FINE.

17 Q. JIM WOULD BE FINE. THANK YOU.

18 YOU MOVED THROUGH A LOT OF TERRITORY. WE
19 ARE GOING TO MOVE THROUGH A FAIR AMOUNT OF TERRITORY. I
20 WANT TO START ON A FAIRLY DISCRETE POINT, WHICH IS DOE
21 FOSTER CHILD NUMBER 1, AS WE HAVE CALLED HIM, THE
22 LAWYERS HAVE CALLED HIM IN THIS LITIGATION, WHO IS A
23 CHILD WHO IS THE SUBJECT OF A MAY 25TH COMMUNICATION AND
24 THEN I BELIEVE AN E-MAIL THAT YOUR COUNSEL SHOWED YOU ON
25 THIS.

1 WHEN DID YOU FIRST BECOME AWARE OF ISSUES
2 WITH DOE FOSTER CHILD NUMBER 1'S PLACEMENT?

3 A. EARLY IN THE FOLLOWING WEEK, SO IT WOULD
4 PROBABLY BE THE WEEK OF MAY 28, I THINK.

5 Q. SO YOU WERE NOT AWARE OF THAT ON MAY 25?

6 A. NO.

7 Q. AND WERE YOU INVOLVED IN ANY OF THE
8 COMMUNICATIONS ON MAY 25?

9 A. NO.

10 Q. AND HOW DID YOU LEARN ABOUT THOSE
11 COMMUNICATIONS?

12 A. BECAUSE MR. BLACK REPORTS DIRECTLY TO ME, AND
13 MR. BLACK WAS HAVING THOSE CONVERSATIONS, TEXTS, AND
14 PHONE CALLS WITH DEPUTY COMMISSIONER ALI.

15 Q. AND WHAT DID MR. BLACK TELL YOU?

16 A. MR. BLACK INDICATED THAT THE -- THAT OUR CUA
17 WORKER, CATHOLIC SOCIAL SERVICES CUA WORKER, ON THE
18 NIGHT OF MAY 25 HAD CONTACTED OUR CSS FOSTER MOTHER WHO
19 WAS VERY WILLING TO TAKE DOE CHILD 1 BACK AND -- INTO
20 HER HOME AND THAT THE -- AND THAT THE CITY CUA RESPONSE
21 WAS THAT THAT WOULD NOT BE PERMITTED DUE TO THE CASE
22 AGAINST CATHOLIC SOCIAL SERVICES.

23 Q. AND WHEN, TO THE BEST OF YOUR RECOLLECTION, DID
24 HE TELL YOU THIS?

25 A. HE TOLD ME THAT ON MONDAY, THE FOLLOWING MONDAY.

1 Q. JIM, I WOULD LIKE YOU TO REFER TO AN EXHIBIT
2 THAT HAS BEEN INTRODUCED IN AN UNREDACTED AND REDACTED
3 FORM, EXHIBITS 10 AND 11 IN FRONT OF YOU. AND THIS IS
4 AN E-MAIL FROM TABITHA SEEHOUSEN TO JERNARD WHITMAN AND
5 ROBERT MONTORO REGARDING DOE FOSTER CHILD NUMBER 1,
6 DATED JUNE 1ST, 2018. IS THAT CORRECT?

7 A. CORRECT.

8 Q. WHO IS MS. SEEHOUSEN?

9 A. SHE IS A FOSTER-CARE CASE MANAGER EMPLOYED BY
10 CATHOLIC SOCIAL SERVICES.

11 Q. AND LET'S DIGRESS FOR A MOMENT, JUST SO I
12 UNDERSTAND. YOU SAID EARLIER THAT YOU OVERSEE CATHOLIC
13 SOCIAL SERVICES IN YOUR POSITION, CORRECT?

14 A. YES.

15 Q. AND WHO DO YOU REPORT TO? WHO IS ABOVE YOU AND
16 WHAT IS THE STRUCTURE THERE?

17 A. I REPORT TO BISHOP JOHN MCINTYRE WHO IS THE
18 PRESIDENT OF OUR BOARDS.

19 Q. AND IS THERE AN OVERSIGHT STRUCTURE ABOVE BISHOP
20 JOHN MCINTYRE?

21 A. HE REPORTS IN THE ARCHBISHOP.

22 Q. AND WITHIN CATHOLIC SOCIAL SERVICES, YOU TALKED
23 ABOUT THE DIFFERENT FOSTER-CARE SERVICES IT OFFERS. I
24 BELIEVE YOU TALKED ABOUT A CUA, WHAT I BELIEVE IS CALLED
25 CONGREGATE CARE, RIGHT?

1 A. YES.

2 Q. AND IN-HOME FOSTER-CARE PLACEMENT?

3 A. CLOSE ENOUGH, YEAH.

4 Q. AND DO THE STAFF OF CATHOLIC SOCIAL SERVICES

5 WORK ACROSS ALL OF THOSE ACTIVITIES, OR ARE THEY SILOED

6 WITHIN ACTIVITIES?

7 A. SILOED IN INDIVIDUAL PROGRAM ACTIVITIES.

8 Q. WHICH PROGRAM ACTIVITY DOES TABITHA SEEHOUSEN

9 WORK IN?

10 A. CATHOLIC SOCIAL SERVICES FOSTER-CARE DEPARTMENT.

11 Q. AND WHO IS MR. WHITMAN?

12 A. HE IS THE CATHOLIC COMMUNITY SERVICES CUA CASE

13 MANAGER.

14 Q. AND WHO IS MR. MONTORO?

15 A. HE IS THE ADMINISTRATOR OF CATHOLIC SOCIAL

16 SERVICES FOSTER-CARE DEPARTMENT.

17 Q. SO IS THIS -- AM I UNDERSTANDING THIS E-MAIL

18 CORRECTLY THAT IT'S NOW THE FOSTER-CARE SERVICES

19 COMMUNICATING INFORMATION ABOUT THIS CASE TO THE CUA?

20 A. CORRECT.

21 Q. AND DID MR. BLACK HAVE THIS INFORMATION BEFORE

22 JUNE 1ST?

23 A. YES.

24 Q. OKAY. HE RELATED THAT INFORMATION TO YOU AT THE

25 START OF THAT WEEK?

1 A. YES, TO THE BEST OF MY RECOLLECTION.

2 Q. YOU ARE PRESENTLY AWARE, AREN'T YOU, THAT DHS
3 WILL GRANT EXCEPTIONS IN SOME CASES FOR PLACEMENTS WITH
4 CATHOLIC SOCIAL SERVICES?

5 A. I ONLY BECAME AWARE OF THAT BECAUSE I ASKED.

6 Q. AND TO THE BEST OF YOUR RECOLLECTION, WHEN DID
7 YOU ASK?

8 A. I ASKED IN LATE MARCH FOR THE EXCEPTION FOR DOE
9 CHILD NUMBER -- THESE NUMBERS -- WAS THAT 1 -- 2. OKAY.

10 Q. AND SO YOU HAVE BEEN AWARE SINCE LATE MARCH THAT
11 DHS WOULD GRANT EXCEPTIONS?

12 A. I WAS ONLY AWARE OF ONE EXCEPTION, FOR DOE CHILD
13 NUMBER 2.

14 Q. YOU ARE AWARE THAT DHS WOULD GRANT EXCEPTIONS IN
15 CERTAIN CASES WHEN APPROPRIATE?

16 A. I WAS AWARE THERE WAS AN EXCEPTION FOR DOE CHILD
17 NUMBER 2.

18 Q. IS YOUR ANSWER NO TO MY QUESTION?

19 MS. BARCLAY: OBJECTION, YOUR HONOR, ASKED
20 AND ANSWERED.

21 THE COURT: HE HAS ANSWERED.

22 MR. FIELD: YOUR HONOR, PERMISSION TO
23 APPROACH THE WITNESS.

24 THE COURT: YES.

25 BY MR. FIELD:

1 Q. MR. AMATO, I HAVE JUST HANDED YOU AN EXHIBIT
2 MARKED DEFENDANT'S EXHIBIT NUMBER 1. IT'S AN E-MAIL
3 FROM JAMES AMATO, DATED TUESDAY, MAY 1ST, TO CYNTHIA
4 FIGUEROA. DO YOU RECALL WRITING THIS E-MAIL?

5 A. YES.

6 Q. AND I WILL NOTE FOR THE RECORD THAT A PORTION OF
7 THE BODY OF THIS E-MAIL IS REDACTED. THAT PORTION --

8 MS. BARCLAY: OBJECTION, YOUR HONOR. MAY WE
9 SEE -- ACTUALLY WE HAVE NEVER SEEN THIS DOCUMENT. MAY WE
10 SEE AN UNREDACTED VERSION FOR COUNSEL'S CONTEXT?

11 THE COURT: YES.

12 MR. FIELD: WE HAVE NO PROBLEM WITH THAT,
13 YOUR HONOR.

14 MS. BARCLAY: MAY MR. AMATO BE ALSO PROVIDED
15 AN UNREDACTED VERSION FOR CLARITY?

16 THE COURT: DO YOU WANT TO REPEAT YOUR
17 QUESTION.

18 BY MR. FIELD:

19 Q. MR. AMATO, I WANT TO DIRECT YOU TO THE
20 PENULTIMATE LINE OF THAT E-MAIL THAT STARTS WITH: WE
21 ARE PREPARED. WOULD YOU READ THAT, PLEASE?

22 A. WE ARE PREPARED TO ACCEPT BOTH CHILDREN BUT
23 REALIZE THAT DHS SENIOR MANAGEMENT WOULD HAVE TO GIVE
24 THE GREEN LIGHT TO CUA FRONT LINE STAFF.

25 Q. ISN'T THAT TRUE THAT YOU UNDERSTOOD THAT CSS

1 SENIOR MANAGEMENT COULD GIVE THE GREEN LIGHT TO CUA
2 FRONT LINE STAFF TO PLACE CHILDREN WITH CSS AS OF MAY
3 1ST?

4 A. THAT LINE WAS BASED ON THE FACT THAT THERE WAS A
5 FREEZE ON ANY OF OUR REFERRALS THAT ENDED -- I NEEDED TO
6 CONTACT THE COMMISSIONER FOR APPROVAL FOR ANY CHILD
7 REFERRED TO US.

8 Q. AND IS THAT WHY YOU WROTE THIS E-MAIL, TO SEEK
9 APPROVAL FOR A REFERRAL?

10 A. I DID.

11 Q. THANK YOU.

12 DID YOU WRITE A SIMILAR E-MAIL TO THE
13 COMMISSIONER REGARDING DOE FOSTER CHILD NUMBER 1?

14 A. NUMBER 1 IS THE MAY, YEAH.

15 Q. CORRECT, THE MAY 25 CHILD?

16 A. NO. MY COMMUNICATIONS WITH DOE CHILD NUMBER 1
17 WERE PHONE CALLS AND AN OCCASIONAL TEXT WITH DEPUTY
18 COMMISSIONER ALI. AT ONE POINT IN ONE OF THE PHONE
19 CALLS, THE COMMISSIONER WAS IN THE CAR WITH HER
20 RETURNING FROM ALLENTOWN.

21 Q. DO YOU RECALL WHEN THOSE PHONE CALLS AND TEXTS
22 WERE?

23 A. I RECALL IN THIS CONTEXT DOE CHILD NUMBER 2
24 RETURNED TO THE CSS FOSTER HOME ON JUNE 12. REMEMBER,
25 THAT'S 17 DAYS AFTER MAY 25, AND THE URGENCY OF THIS

1 CHILD BEING SETTLED IN THE HOME WAS GROWING.

2 THE COURT: LET'S JUST ANSWER THE QUESTION.

3 THE WITNESS: OKAY. GIVE ME THE QUESTION
4 AGAIN.

5 BY MR. FIELD:

6 Q. I WAS ASKING IF YOU RECALL WHEN THOSE PHONE
7 CALLS WERE. AND JUST TO CLARIFY THE RECORD, YOU SAID
8 FOSTER CHILD NUMBER 2. I BELIEVE WE ARE TALKING ABOUT
9 FOSTER CHILD NUMBER 1, JUST SO IT'S CLEAR.

10 A. THE DOES ARE GETTING ME CONFUSED. THAT
11 CONVERSATION WOULD HAVE BEEN SEVERAL DAYS PRIOR TO JUNE
12 12.

13 Q. SO SHORTLY -- IN BROAD TERMS, SHORTLY BEFORE THE
14 CHILD WAS, AS YOU SAID, PLACED WITH A CSS HOUSEHOLD?

15 A. CORRECT.

16 Q. THANK YOU.

17 JIM, WHEN YOU WERE TALKING ABOUT THE VARIOUS
18 PROGRAMS RELATED TO FOSTER CHILDREN THAT CATHOLIC SOCIAL
19 SERVICES OPERATES, YOU REFERENCED THE FOSTER-CARE
20 DEPARTMENT. YOU ALSO REFERENCED THE RESIDENTIAL SERVICES.
21 APPROXIMATELY HOW MANY CHILDREN ARE SERVICED THROUGH THE
22 RESIDENTIAL SERVICES PROGRAM?

23 A. 260 DAILY AT EITHER ST. GABRIEL'S HALL AND ST.
24 FRANCIS. AND ANOTHER 85 CHILDREN SERVED AT DE LA SALLE
25 VOCATIONAL, A DAY TREATMENT PROGRAM THAT IS IN THAT

1 CONTRACT DESPITE THE FACT THAT THE CHILDREN ARE LIVING
2 AT HOME WITH THEIR FAMILIES. THESE ARE ALL KIDS
3 ADJUDICATED DELINQUENT.

4 Q. AND YOU ALSO MENTIONED THE CUA, THE COMMUNITY
5 UMBRELLA AGENCY?

6 A. CORRECT.

7 Q. HOW MANY CHILDREN ARE SERVICED THROUGH THE
8 COMMUNITY UMBRELLA AGENCY?

9 A. I GET A REGULAR REPORT. MY LAST RECOLLECTION IS
10 ABOUT 800.

11 Q. HOW MANY OF CATHOLIC SOCIAL SERVICES EMPLOYEES
12 ARE EMPLOYED BY THE COMMUNITY UMBRELLA AGENCY OR THEIR
13 AGREEMENT IS WITH REFERENCE TO THE COMMUNITY UMBRELLA
14 AGENCY?

15 A. APPROXIMATELY 50 TO 60.

16 Q. DOES THAT INCLUDE CASE WORKERS?

17 A. THAT INCLUDES ALL STAFF EMPLOYED BY THE --

18 Q. WHAT TYPES OF STAFF WOULD THAT BE?

19 A. FROM SECRETARIES AND SUPPORT STAFF ON THE CASE,
20 MANAGERS, SUPERVISORS, CASE MANAGEMENT DIRECTORS, AND
21 SENIOR MANAGEMENT.

22 Q. AND YOU MENTIONED THAT THERE WERE 1500 KIDS LAST
23 YEAR THROUGH ALL ACROSS CATHOLIC SOCIAL SERVICES?

24 A. YES.

25 Q. DOES CATHOLIC SOCIAL SERVICES WORK WITH ANY

1 OTHER COUNTY OTHER THAN PHILADELPHIA IN THE FIVE-COUNTY
2 AREA?

3 A. WE HAVE CONTRACTS, BUT VERY FEW REFERRALS WITH
4 THE MONTGOMERY/BUCKS.

5 Q. YOU HAVE CONTRACTS WITH MONTGOMERY AND BUCKS
6 COUNTY?

7 A. YES.

8 Q. DO THOSE CONTRACTS INCLUDE FOSTER-CARE?

9 A. YES.

10 Q. SO I WOULD LIKE TO TURN TO THE DISCUSSION OF --
11 I UNDERSTAND TO BE THE CORE ISSUES OF THIS CASE, WHICH
12 IS CATHOLIC SOCIAL SERVICES' REFUSAL TO CERTIFY SAME-SEX
13 COUPLES FOR FOSTER-CARE. YOU SAID IN YOUR TESTIMONY,
14 AND I APOLOGIZE, I WANT TO GET YOUR WORDS RIGHT, TO THE
15 EXTENT I WROTE THEM DOWN CORRECTLY -- SO BEAR WITH ME A
16 MOMENT -- THAT YOU WOULD NOT DO IT, AND "IT" I TAKE IT
17 YOU MEANT CSS WOULD NOT CERTIFY SAME-SEX RESOURCE
18 PARENTS, I THINK THEY ARE CALLED --

19 MS. BARCLAY: OBJECTION, SPECULATION.

20 THE COURT: OVERRULED.

21 MR. FIELD: I AM JUST TRYING TO MAKE SURE I
22 GOT HIS WORDS CORRECT, YOUR HONOR.

23 BY MR. FIELD:

24 Q. YOU SAID IT WAS AGAINST THE TEACHING OF THE
25 CATHOLIC CHURCH, IS THAT CORRECT?

1 A. CAN YOU REPEAT THE QUESTION, PLEASE.

2 Q. IS CERTIFYING A SAME-SEX -- I'M SORRY, A FOSTER
3 PARENT WHO IS IN A SAME-SEX RELATIONSHIP AGAINST THE
4 TEACHING OF THE CATHOLIC CHURCH?

5 A. THE CATHOLIC CHURCH ASSERTS ITS RELIGIOUS
6 BELIEF, A MARRIAGE TO A SACRED BOND BETWEEN A MAN AND A
7 WOMAN. SO THAT CERTIFYING A HOME OF THE SAME-SEX COUPLE
8 WOULD BE IN VIOLATION OF THAT RELIGIOUS BELIEF.

9 Q. SO -- AND TO BE CLEAR, I AM NOT CHALLENGING THE
10 SINCERITY OF THE RELIGIOUS BELIEF OR THE DOCTRINE YOU
11 REFERENCE REGARDING SAME-SEX COUPLES OR SAME-SEX
12 MARRIAGE. BUT WHAT IS IT ABOUT CERTIFYING THE HOME AS
13 RESOURCE PARENTS FOR A FOSTER CHILD THAT IS AGAINST THE
14 -- YOUR BELIEFS?

15 MS. BARCLAY: I OBJECT, YOUR HONOR. THIS HAS
16 NOT ARISEN. IT IS CALLING FOR SPECULATION.

17 THE COURT: I'M SORRY.

18 MS. BARCLAY: I'M OBJECTING SINCE HE IS BEING
19 ASKED ABOUT A PARTICULAR RESOURCE HOME, WHAT WOULD CAUSE A
20 PROBLEM WITH THE RELIGIOUS BELIEFS. I AM NOTING THIS CALLS
21 FOR SPECULATION.

22 THE COURT: OVERRULED.

23 THE WITNESS: BECAUSE AS I INDICATED EARLIER,
24 A HOME STUDY IS ESSENTIALLY A VALIDATION OF THE
25 RELATIONSHIPS IN THAT HOME, AND IN THIS CASE THAT

1 RELATIONSHIP IS -- THAT RELATIONSHIP IS NOT ONE THAT IS
2 ACCEPTABLE IN TERMS OF CHURCH TEACHING.

3 BY MR. FIELD:

4 Q. LET'S TALK ABOUT HOME STUDY. WHAT DOES CSS DO
5 IN PERFORMING A HOME STUDY?

6 A. WELL, THE HOME STUDY OBVIOUSLY IS DONE IN THE
7 POTENTIAL FOSTER PARENT'S HOME AND THAT INVOLVES A
8 THOROUGH REVIEW OF THE HOME FOR SAFETY-RELATED REASONS,
9 FOR THE PHYSICAL PLAN OF THE HOME, THE CLEARANCES
10 ABSOLUTELY HAVE TO BE DONE FOR ALL OF THE INDIVIDUALS IN
11 THE HOME, AND AN EVALUATION OF THE QUALITY OF THE
12 RELATIONSHIPS IN THAT HOME AND -- AS TO HOW THEY WOULD
13 BEST BENEFIT THE CHILD WHO MIGHT BE PLACED THERE.

14 Q. TO YOUR KNOWLEDGE IS THERE ANYTHING IN THE CSS
15 CONTRACT WITH THE CITY OR THE STATE REGULATIONS THAT
16 APPLY TO EVALUATION OF RESOURCE PARENTS THAT REFERS TO
17 THE MARITAL STRUCTURE OF THE HOME?

18 MS. BARCLAY: OBJECTION, CALLING FOR A LEGAL
19 OPINION, YOUR HONOR.

20 THE COURT: OVERRULED.

21 THE WITNESS: TO MY KNOWLEDGE, THERE IS
22 NOTHING IN THE STATE REGULATIONS THAT SPEAKS TO THE
23 NECESSITY OR THE REQUIREMENT THAT FOSTER PARENTS BE MARRIED.

24 BY MR. FIELD:

25 Q. SO -- AND I AM GOING TO ASK AGAIN. WHAT IS IT

1 THAT CSS IS DOING, IF THERE IS NOTHING -- NO MARRIAGE
2 REQUIREMENTS THAT BURDENS THIS RELIGIOUS DOCTRINE WHEN
3 YOU ARE REVIEWING A RESOURCE PARENT?

4 MS. BARCLAY: OBJECTION. ASKED AND ANSWERED,
5 YOUR HONOR.

6 THE COURT: OVERRULED.

7 THE WITNESS: REPEAT THE QUESTION, PLEASE.

8 BY MR. FIELD:

9 Q. WHAT IS IT ABOUT CSS'S REVIEW OF A HOUSEHOLD TO
10 BE A RESOURCE PARENT OR AN INDIVIDUAL TO BE A RESOURCE
11 PARENT THAT BURDENS YOUR RELIGIOUS BELIEF IF THAT PARENT
12 HAPPENS TO BE IN A SAME-SEX RELATIONSHIP?

13 MS. BARCLAY: OBJECTION TO THE FORM OF THE
14 QUESTION; COMPOUND QUESTION.

15 THE COURT: OVERRULED.

16 THE WITNESS: CATHOLIC TEACHING, AND I WILL
17 QUALIFY THAT BY THE OBVIOUS, I AM NOT A THEOLOGIAN, CATHOLIC
18 TEACHING -- IT IS CLEAR THAT CHILDREN ARE BEST RAISED IN A
19 HOME THAT OF -- WHERE -- WITH A HUSBAND AND WIFE.

20 BY MR. FIELD:

21 Q. IS IT YOUR BELIEF THAT A RESOURCE PARENT IN A
22 SAME-SEX RELATIONSHIP IS NOT QUALIFIED TO RAISE A FOSTER
23 CHILD?

24 A. IT IS MY BELIEF THAT THAT FOSTER PARENT IS IN A
25 LIFESTYLE THAT CANNOT BE ACCEPTED BY THE -- VIA THE

1 TEACHINGS OF THE CATHOLIC CHURCH.

2 Q. IS THAT THE REASON YOU REFUSED TO PERFORM
3 CERTIFICATIONS FOR THOSE HOUSEHOLDS?

4 MS. BARCLAY: OBJECTION, ASKED AND ANSWERED,
5 YOUR HONOR.

6 THE COURT: OVERRULED.

7 THE WITNESS: YES.

8 BY MR. FIELD:

9 Q. JIM, WHEN YOU WERE TALKING ABOUT CERTIFICATIONS
10 BEFORE, YOUR COUNSEL ASKED YOU ABOUT A COUPLE OF OTHER
11 CIRCUMSTANCES. I BELIEVE YOU DID SAY IT'S CORRECT THAT
12 CATHOLIC SOCIAL SERVICES WORKS WITH FOSTER CHILDREN WHO
13 ARE LGBTQ IDENTIFYING, IS THAT CORRECT?

14 A. CORRECT.

15 Q. AND CATHOLIC SOCIAL SERVICES WORKS WITH SINGLE
16 PARENTS WHO ARE LGBTQ IDENTIFYING, IS THAT CORRECT?

17 MS. BARCLAY: OBJECTION AS TO CALLING FOR
18 SPECULATION.

19 THE COURT: OVERRULED.

20 THE WITNESS: CATHOLIC SOCIAL SERVICES SERVES
21 ANY INDIVIDUAL REGARDLESS OF SEXUAL ORIENTATION WHO REQUEST
22 SERVICES AS A CLIENT FOR CATHOLIC SOCIAL SERVICES.

23 BY MR. FIELD:

24 Q. EXCEPT FOR INDIVIDUALS WHO ARE IN SAME-SEX
25 RELATIONSHIPS?

1 THE COURT: HOW ABOUT UNMARRIED COUPLES?

2 THE WITNESS: UNMARRIED COUPLES -- WITH AN
3 UNMARRIED COUPLE, WHAT CATHOLIC SOCIAL SERVICES DOES IN
4 TERMS OF HOME STUDIES IS TO IMMEDIATELY REFER THE UNMARRIED
5 COUPLE TO ANOTHER AGENCY WHO WOULD COMPLETE A HOME STUDY.
6 BY MR. FIELD:

7 Q. SO CATHOLIC SOCIAL SERVICES REFUSES TO CONDUCT
8 HOME STUDIES FOR UNMARRIED COUPLES?

9 MS. BARCLAY: OBJECTION AS TO THE FORM OF THE
10 QUESTION.

11 THE COURT: OVERRULED.

12 THE WITNESS: CATHOLIC SOCIAL SERVICES DOES
13 NOT COMPLETE HOME STUDIES FOR UNMARRIED COUPLES BUT
14 IMMEDIATELY PUTS THE UNMARRIED COUPLE IN TOUCH WITH ONE OF
15 28 OTHER AGENCIES WHO WOULD COMPLETE THAT HOME STUDY.
16 BY MR. FIELD:

17 Q. DOES CATHOLIC SOCIAL SERVICES COMPLETE HOME
18 STUDIES FOR MARRIED COUPLES WHO ARE PREVIOUSLY DIVORCED?

19 A. YES.

20 Q. EVEN IF THAT DIVORCE HAS NOT BEEN PROPERLY
21 ANNULLED WITH THE CATHOLIC CHURCH?

22 MS. BARCLAY: OBJECTION, YOUR HONOR.

23 THE COURT: OVERRULED.

24 MS. BARCLAY: IT IS SPECULATION WHETHER OR
25 NOT THE DIVORCE HAS BEEN ANNULLED OR NOT.

1 MR. FIELD: I CAN REPHRASE, YOUR HONOR.

2 BY MR. FIELD:

3 Q. DOES CATHOLIC SOCIAL SERVICES ASK IF THE DIVORCE
4 HAS BEEN ANNULLED WITH THE CATHOLIC CHURCH?

5 A. NO. WE ASK FOR A LETTER FROM THE COUPLE'S LOCAL
6 CLERGY OR PASTOR.

7 Q. SO YOU REFERENCED ASKING FOR A CLERGY LETTER
8 BEFORE. PLEASE EXPLAIN TO ME WHAT A CLERGY LETTER IS.

9 A. A CLERGY LETTER CAN BE A REFERENCE LETTER FROM A
10 PASTOR WHO WOULD INDICATE THAT HE OR SHE KNOWS THE
11 COUPLE, IS AWARE OF THEIR ACTIVE PARTICIPATION IN
12 RELIGIOUS SERVICES, BOTH -- REGARDLESS OF THE FAITH,
13 WHICH WE DEEM IS A VERY GOOD INDICATION OF THEIR
14 COMMITMENT TO THEIR FAITH AND THEIR COMMITMENT TO RAISE
15 A CHILD IN THAT FAITH AND THAT THAT FAITH DOES NOT HAVE
16 TO BE AND IS USUALLY NOT CATHOLICISM.

17 Q. IS A CLERGY LETTER A REQUIREMENT OF CATHOLIC
18 SOCIAL SERVICES' HOME STUDY TO CERTIFY PROSPECTIVE
19 FOSTER PARENTS?

20 A. YES, WE REQUIRE THAT LETTER.

21 Q. IF THERE IS NOT A CLERGY LETTER, WILL YOU
22 CERTIFY THAT PROSPECTIVE RESOURCE PARENT?

23 A. NOT TO MY KNOWLEDGE.

24 Q. YOU MENTIONED THAT THE FAITH OF THAT CLERGY
25 LETTER DOES NOT MATTER, IS THAT CORRECT?

1 A. CORRECT.

2 Q. SO CLERGY OR A PASTOR IS THE TERM YOU ARE USING,
3 BUT IT COULD BE A RABBI OR AN IMAM?

4 A. ABSOLUTELY.

5 Q. AND IS THERE A LETTER THAT AN INDIVIDUAL WHO
6 DOES NOT PARTICIPATE IN RELIGIOUS WORSHIP COULD PROVIDE
7 CATHOLIC SOCIAL SERVICES TO SATISFY THIS REQUIREMENT?

8 A. NOT TO MY KNOWLEDGE.

9 Q. WOULD ANYBODY ELSE OTHER THAN YOU HAVE THAT
10 KNOWLEDGE?

11 MS. BARCLAY: OBJECTION, YOUR HONOR. THAT IS
12 CALLING FOR SPECULATION.

13 THE COURT: OVERRULED.

14 THE WITNESS: THE STAFF THAT ARE DAY-TO-DAY
15 IN THE FOSTER-CARE DEPARTMENT AND ARE REGULARLY HANDLING THE
16 INQUIRIES AND THE MATTERS THAT ARISE WOULD HAVE A BETTER
17 HANDLE ON THAT.

18 BY MR. FIELD:

19 Q. YOU OVERSEE THE STAFF, CORRECT?

20 A. I OVERSEE THEM THROUGH JIM BLACK, WHO REPORTS TO
21 ME, AND OUR FOSTER-CARE ADMINISTRATOR REPORTS TO HIM.

22 Q. AND IT IS YOUR UNDERSTANDING, AT THE TOP OF THAT
23 CATHOLIC SOCIAL SERVICES HIERARCHY, THAT ONE HAS TO HAVE
24 A -- AS YOU CALL IT, A CLERGY LETTER IN ORDER TO BECOME
25 A FOSTER PARENT THROUGH CATHOLIC SOCIAL SERVICES,

1 CORRECT?

2 MS. BARCLAY: ASKED AND ANSWERED.

3 THE COURT: OVERRULED.

4 THE WITNESS: YES.

5 BY MR. FIELD:

6 Q. JIM, IF YOU CAN JUST RETURN QUICKLY TO THE
7 CERTIFICATION PROCESS. YOU SAID THAT THERE IS A WRITTEN
8 ENDORSEMENT, I BELIEVE WAS THE WORD THAT YOU USED, OF
9 THE RELATIONSHIP. WHAT IS THAT WRITTEN ENDORSEMENT?

10 A. IT'S THE COMPLETED --

11 MS. BARCLAY: OBJECTION; ASKED AND ANSWERED
12 AGAIN.

13 THE COURT: OVERRULED.

14 THE WITNESS: IT'S THE FINAL PRODUCT OF THE
15 WRITTEN HOME STUDY THAT APPEARS IN THE FOSTER PARENT'S CASE
16 RECORD.

17 BY MR. FIELD:

18 Q. AND TO YOUR KNOWLEDGE, DOES THAT FINAL PRODUCT
19 -- IS THERE A REQUIREMENT THAT FINAL PRODUCT REFERENCE
20 THE MARRIAGE?

21 A. YES.

22 Q. AND WHAT IS -- WHERE IS THAT REQUIREMENT FOUND?

23 MS. BARCLAY: OBJECTION, YOUR HONOR. THE
24 WITNESS HAS TESTIFIED THAT HE IS AWARE ABOUT THE
25 REQUIREMENT. HE DOES NOT NEED TO CITE THE LEGAL CODE THAT

1 REQUIRES THAT.

2 THE COURT: OVERRULED.

3 THE WITNESS: SO ASK ME THAT AGAIN, PLEASE.

4 BY MR. FIELD:

5 Q. WHERE IS THAT REQUIREMENT FOUND IN REFERENCE TO
6 THE MARRIAGE?

7 A. OUR POLICY -- WE HAVE A POLICY AND PROCEDURE
8 STATED ON RECRUITMENT THAT INDICATES THAT -- ON
9 FOSTER-CARE HOME STUDY THAT INDICATES THAT MARRIAGE IS
10 REQUIRED AND THAT THE CLERGY LETTER IS REQUIRED.

11 Q. THESE ARE CSS'S REQUIREMENTS?

12 A. YES.

13 Q. THESE ARE NOT IN THE CONTRACT WITH THE CITY OF
14 PHILADELPHIA?

15 A. NOT IN THE CONTRACT.

16 Q. AND TO YOUR KNOWLEDGE, NOT IN THE STATE
17 REGULATIONS?

18 A. NOT IN THE STATE REGULATIONS.

19 THE COURT: MR. AMATO, I WANT TO ASK YOU A
20 QUESTION THAT I AM NOT QUITE SURE WHETHER OR NOT YOU
21 ANSWERED. DOES THE CSS CONSIDER SINGLE PARENTS WHO ARE
22 LGBTQ FOR CERTIFICATION?

23 THE WITNESS: YEAH. WE WOULD COMPLETE A HOME
24 STUDY FOR A SINGLE PARENT WHO IS LIVING MONOGAMOUSLY TO BE A
25 FOSTER PARENT.

1 THE COURT: OKAY.

2 BY MR. FIELD:

3 Q. SO YOU WOULD NOT INQUIRE OF THAT SINGLE PARENT
4 ANYTHING ABOUT THEIR SEXUAL ORIENTATION OR PRACTICES?

5 A. SEXUAL BEHAVIORS AND PRACTICES ARE NOT A PART OF
6 ANY HOME STUDY.

7 Q. AND IF THERE WERE A RESOURCE PARENT WHO WAS PART
8 OF AN UNMARRIED SAME-SEX COUPLE, WOULD YOU CONSIDER THEM
9 FOR TO -- FOR CERTIFICATION AS A RESOURCE PARENT?

10 MS. BARCLAY: OBJECTION, ASKED AND ANSWERED.
11 WE'VE ALREADY SPOKEN ABOUT UNMARRIED COUPLES.

12 THE COURT: OVERRULED.

13 THE WITNESS: CAN YOU PLEASE ASK ME THAT
14 AGAIN.

15 BY MR. FIELD:

16 Q. IF THERE WAS A PROSPECTIVE RESOURCE PARENT
17 SEEKING CERTIFICATION AND CAME TO CATHOLIC SOCIAL
18 SERVICES AND THEY WERE PART OF AN UNMARRIED SAME-SEX
19 COUPLE, WOULD YOU CONSIDER THEM FOR CERTIFICATION?

20 MS. BARCLAY: THIS IS ALSO CALLING FOR
21 SPECULATION. THE SITUATION HAS NOT ARISEN.

22 THE COURT: OVERRULED.

23 THE WITNESS: I QUALIFY THAT FIRST BY SAYING
24 THAT WE HAVE NOT RECEIVED ANY INTEREST IN FOSTER-CARE IN
25 THAT PROFILE THAT YOU JUST SUGGESTED. OKAY? SO....

1 BY MR. FIELD:

2 Q. I UNDERSTAND THAT, BUT I WOULD LIKE AN ANSWER TO
3 THE QUESTION.

4 A. GIVE ME THE QUESTION AGAIN.

5 Q. WOULD CATHOLIC SOCIAL SERVICES CERTIFY OR EVEN
6 MOVE THROUGH THE PROCESS OF CERTIFICATION OF A
7 PROSPECTIVE RESOURCE PARENT WHO IS IN A SAME-SEX
8 UNMARRIED RELATIONSHIP?

9 A. IF THAT SITUATION AROSE, AND THE PERSON THAT
10 THEY WERE IN AN UNMARRIED RELATIONSHIP WITH LIVED IN
11 THAT HOME, WE WOULD NOT CONTINUE TO MOVE FORWARD WITH
12 THAT.

13 Q. WHAT IF THE INDIVIDUALS WERE MONOGAMOUS?

14 A. THAT'S A HYPOTHETICAL SITUATION. WE HAVE NEVER
15 RUN INTO THAT, SO....

16 MS. BARCLAY: AND I AM GOING TO OBJECT AGAIN
17 TO SPECULATION, YOUR HONOR. THE WITNESS HAS ALREADY
18 TESTIFIED THEY DON'T INQUIRE ABOUT SPECIFIC SEXUAL
19 PRACTICES, AND SO WHAT THE HOME STUDY PROCESS LOOKS AT IS
20 PARENTS IN THE HOME.

21 MR. FIELD: YOUR HONOR, I DON'T BELIEVE IT'S
22 APPROPRIATE FOR HER TO TESTIFY ABOUT THE HOME STUDY PROCESS.

23 THE COURT: YES.

24 MS. BARCLAY: IT IS SPECULATION, YOUR HONOR.

25 THE COURT: HE HAS ANSWERED THE QUESTIONS.

1 MR. FIELD: YES.

2 CAN I HAVE A MINUTE WITH MY COLLEAGUES, YOUR
3 HONOR, COURT INDULGENCE?

4 THE COURT: YES.

5 (BRIEF PAUSE IN THE PROCEEDING.)

6 MR. FIELD: YOUR HONOR, I ONLY HAVE A MOMENT
7 LEFT. I HAVE TO JUST OBTAIN ONE EXHIBIT.

8 THE COURT: YES.

9 BY MR. FIELD:

10 Q. JIM, JUST ONE QUICK QUESTION ON THE TOPICS WE
11 WERE COVERING BEFORE. WILL CATHOLIC SOCIAL SERVICES
12 CERTIFY A SINGLE RESOURCE PARENT WHO IS NOT CELIBATE?

13 MS. BARCLAY: OBJECTION, YOUR HONOR. THE
14 WITNESS HAS ANSWERED THEY DON'T INQUIRE AS TO SEXUAL --

15 THE COURT: THAT IS WHAT HE STATED, SO HE
16 WOULD NOT KNOW.

17 BY MR. FIELD:

18 Q. IS THAT CORRECT, YOU WOULD NOT KNOW WHETHER OR
19 NOT THEY ENGAGED IN SEXUAL ACTIVITIES?

20 MS. BARCLAY: OBJECTION AGAIN, YOUR HONOR.
21 THIS HAS BEEN ANSWERED.

22 MR. FIELD: HE ONLY SAID THEY DON'T INQUIRE,
23 YOUR HONOR. HE MIGHT BE TOLD THAT. I DON'T KNOW THE RANGE
24 OF SITUATIONS THAT OCCUR, BUT THIS IS ALL A LITTLE OUTSIDE
25 THE BOX.

1 THE COURT: I AM GOING TO SUSTAIN THE
2 OBJECTION.

3 MR. FIELD: THANK YOU, YOUR HONOR.

4 BY MR. FIELD:

5 Q. SO, JIM, IN YOUR PRIOR QUESTIONING, YOU TALKED
6 ABOUT COMMUNICATIONS WITH THE CITY REGARDING CLOSURE OF
7 INTAKE AND REGARDING ONGOING CONTRACTS WITH THE CITY.
8 IS IT CATHOLIC SOCIAL SERVICES'S POSITION THAT IT WILL
9 NOT SIGN A FULL ONGOING CONTRACT WITH THE CITY?

10 MS. BARCLAY: OBJECTION, YOUR HONOR, CALLS
11 FOR SPECULATION.

12 MR. FIELD: I AM ASKING THE ORGANIZATION'S
13 POSITION.

14 THE COURT: RIGHT. OVERRULED.

15 THE WITNESS: TO UNDERSTAND THE
16 ORGANIZATION'S POSITION IS TO UNDERSTAND THE OVERALL
17 CONTRACT. IN THE CITY TERMINOLOGY, THIS IS A 290
18 REPLACEMENT CONTRACT THAT INVOLVES NOT ONLY FOSTER-CARE BUT
19 ST. GABRIEL'S AND ST. FRANCIS AND OUR REINTEGRATION PROGRAM.
20 SO WE WOULD MOVE FORWARD WITH THAT CONTRACT BECAUSE THOSE
21 KIDS -- IT'S AN IMPORTANT MISSION FOR US. IT'S AN IMPORTANT
22 CONTRACT AND THE CHILDREN NEED TO BE SERVED.

23 BY MR. FIELD:

24 Q. AND ST. GABRIEL'S AND ST. FRANCIS --

25 A. ST. GABRIEL'S SYSTEM, WHICH IS ST. GABRIEL'S

1 HALL, IS 150 ADJUDICATED DELINQUENT BOYS. ST. FRANCIS
2 AND ST. VINCENT'S IS 115 ADOLESCENT BOYS AND GIRLS,
3 PLACED IN GROUP HOMES.

4 Q. AND THAT IS CONGREGATE UNITS?

5 A. GROUP HOMES, YES.

6 Q. GROUP HOMES?

7 A. ST. GABE'S IS CONGREGATE INSTITUTIONAL CARE.

8 ST. FRANCIS IS SMALL GROUP HOMES.

9 Q. FOR THE CONTRACT THAT IS TERMINATING ON
10 JUNE 30TH, THOSE WERE PART OF THE SAME CONTRACT, IS THAT
11 CORRECT?

12 A. YES.

13 Q. AND ISN'T IT TRUE THAT YOU HAVE RECEIVED TWO
14 SEPARATE NOTICE OF AWARDS FOR THE COMING YEAR'S
15 CONTRACTS FROM THE CITY WHICH SEPARATED THE FOSTER-CARE
16 SERVICES THAT ARE AT ISSUE IN THIS LITIGATION AND WHAT
17 YOU WERE JUST TALKING ABOUT, GROUP HOMES, CONGREGATE
18 CARE?

19 MS. BARCLAY: OBJECTION TO THE FORM OF THE
20 COMPOUND QUESTION.

21 THE COURT: YES. BREAK IT DOWN, PLEASE.

22 BY MR. FIELD:

23 Q. DID YOU RECEIVE NOTICES OF AWARDS FOR THE COMING
24 CONTRACT YEAR FROM THE CITY?

25 A. I RECEIVED A CONTRACT LETTER WITH A COVER LETTER

1 FROM THE COMMISSIONER THAT INDICATED THAT THE 290
2 CONTRACT WOULD BE MOVING FORWARD, BUT EXPLICITLY NOTED
3 THAT WOULD BE A TRANSITION FOR CSS FOSTER-CARE.

4 Q. DID THE CITY OFFER -- ISN'T IT TRUE THAT THE
5 CITY OFFERED YOU A FULL CONTRACT FOR FOSTER-CARE IF
6 CATHOLIC SOCIAL SERVICES WOULD COMPLY WITH ALL OF ITS
7 OBLIGATIONS UNDER THAT CONTRACT?

8 MS. BARCLAY: OBJECTION, YOUR HONOR.

9 THE COURT: OVERRULED.

10 THE WITNESS: I DON'T RECALL EVER BEING MADE
11 THAT OFFER.

12 MR. FIELD: PERMISSION TO APPROACH THE
13 WITNESS, YOUR HONOR.

14 THE COURT: YES.

15 BY MR. FIELD:

16 Q. MR. AMATO, I HAVE JUST GIVEN YOU A DOCUMENT
17 MARKED DEFENDANT'S EXHIBIT 2.

18 A. RIGHT.

19 Q. THIS IS AN E-MAIL FROM JONATHAN JANISZEWSKI WHO
20 I'LL REPRESENT IS AN ATTORNEY WITH THE CITY OF
21 PHILADELPHIA TO LORI WINDHAM FROM BECKET FUND, HERE
22 TODAY, DATED JUNE 5TH AND REQUEST THAT MS. WINDHAM
23 FORWARD THE MESSAGE TO YOU. CAN YOU TAKE A LOOK AT THE
24 PART THAT BEGINS, DEAR MR. AMATO?

25 A. OKAY.

1 Q. HAVE YOU SEEN THIS DOCUMENT BEFORE?

2 A. I HAVE.

3 Q. DOES THIS REFRESH YOUR RECOLLECTION ABOUT
4 WHETHER OR NOT THE CITY EVER OFFERED YOU A FULL CONTRACT
5 FOR FOSTER-CARE SERVICES FOR THE COMING YEAR?

6 MS. BARCLAY: I OBJECT, YOUR HONOR. THE FULL
7 CONTRACT IS VAGUE. IT'S NOT CLEAR EXACTLY WHAT IS BEING
8 ASKED OF THE WITNESS.

9 THE COURT: OFFERED A CONTRACT.

10 MS. BARCLAY: THERE ARE MULTIPLE CONTRACTS
11 BEING OFFERED.

12 THE COURT: HE SAID FOSTER-CARE.

13 MS. BARCLAY: THERE HAVE BEEN MULTIPLE OFFERS
14 -- TWO DIFFERENT TYPES OF --

15 THE COURT: THIS SHOULD BE NO PROBLEM WITH
16 THIS EXHIBIT.

17 THE WITNESS: GIVE THAT TO ME AGAIN, PLEASE.
18 BY MR. FIELD:

19 Q. DOES THIS REFRESH YOUR RECOLLECTION ABOUT
20 CONTRACT DISCUSSIONS WITH THE CITY?

21 A. IT REFRESHES MY MEMORY ABOUT THIS LETTER.

22 Q. CAN YOU READ THE LAST PARAGRAPH -- FULL
23 PARAGRAPH THAT STARTS "PLEASE"?

24 A. PLEASE KNOW THAT DHS VALUES ITS HISTORIC
25 RELATIONSHIP WITH CSS AND IF CSS IS ABLE TO FIND A WAY

1 TO APPROVE SAME-SEX FOSTER AND ADOPTIVE PARENTS
2 CONSISTENT WITH CURRENT LAW AND CITY POLICY, DHS WILL
3 OFFER CSS A NEW CONTRACT THAT ALLOWS CSS TO CONTINUE TO
4 SELECT AND RECRUIT NOW FOSTER PARENTS AND CONTINUE TO
5 RECEIVE NEW REFERRALS. HOWEVER, IF CSS IS UNABLE TO DO
6 SO, DHS STILL SENDS YOU -- INTENDS TO SEND YOU AN
7 OFFICIAL AWARD LETTER TO PREPARE FOR A NEW CONTRACT
8 UNDER THE TERMS DESCRIBED ABOVE. YOU SHOULD ANTICIPATE
9 RECEIVING DHS OFFICIAL AWARD LETTER LATER THIS WEEK.
10 PLEASE CONTACT ME IF YOU WISH TO DISCUSS THE MATTER.

11 Q. WILL CSS ENTER INTO A CONTRACT WITH THE CITY
12 CONSISTENT WITH CURRENT LAW AND POLICY ARTICULATED IN
13 THAT PARAGRAPH?

14 MS. BARCLAY: OBJECTION, YOUR HONOR.

15 MR. FIELD: FOR FOSTER-CARE SERVICES.

16 MS. BARCLAY: HE IS ASKING FOR THE LEGAL --

17 THE COURT: OVERRULED.

18 THE WITNESS: THE CSS WILL ENTER A CONTRACT
19 WITH THE CITY UNDER THE 290 CONTRACT WITH THE IDEA THAT OUR
20 -- THAT OUR WITHDRAWAL FROM THE CONTRACT AND THE OVERALL --
21 AND THE CONTRACT COULD BE WITHIN JUST A MATTER OF MONTHS.
22 BY MR. FIELD:

23 Q. CAN YOU EXPLAIN THAT?

24 A. YOU CAN'T SUSTAIN A CONTACT WITHOUT REFERRALS.
25 SO THAT ULTIMATELY WE ARE GOING TO HAVE TO PHASE OUT THE

1 PROGRAM AND THE STAFF.

2 Q. I WAS ASKING IF YOU WOULD ENTER INTO A CONTRACT
3 THAT REQUIRED YOU TO DO THE FULL SET OF FOSTER-CARE
4 SERVICES.

5 MS. BARCLAY: OBJECTION AS TO SPECULATION AS
6 TO WHAT THE FULL CONTRACT WOULD ENTAIL AS FAR AS CONTRACT
7 TERMS.

8 THE COURT: TO THE EXTENT THAT THEY HAVE
9 ALREADY ENTERED INTO A CONTRACT AND THEY HAVE BEEN -- ARE
10 UNDER CONTRACT WITH THE CITY FOR A NUMBER OF YEARS, I'M SURE
11 THAT MR. AMATO UNDERSTANDS THE PROVISIONS, GENERAL
12 PROVISIONS OF THE CONTRACT, SO HE CAN ANSWER.

13 MS. BARCLAY: YOUR HONOR, IF I MAY ADD, THE
14 CITY HAS INDICATED THAT PROVISIONS WILL BE CHANGING IN THE
15 NEW CONTRACT, WHICH IS WHY IT'S CALLING FOR SPECULATION.

16 MR. FIELD: YOUR HONOR, I DON'T BELIEVE IT'S
17 APPROPRIATE FOR OPPOSING COUNSEL TO BE TESTIFYING ABOUT
18 THESE MATTERS.

19 THE COURT: OVERRULED. YOU MAY ANSWER THE
20 QUESTION, IF YOU CAN.

21 THE WITNESS: CAN YOU PLEASE ASK THE QUESTION
22 AGAIN.

23 BY MR. FIELD:

24 Q. IN THE DOCUMENT MARKED DEFENDANT'S EXHIBIT 2,
25 THE CITY STATED THAT CONSISTENT WITH CURRENT LAW AND

1 CITY POLICY, DHS WOULD OFFER CSS A NEW CONTRACT THAT
2 ALLOWS CSS TO CONTINUE TO SELECT AND RECRUIT NEW FOSTER
3 PARENTS AND CONTINUE TO RECEIVE NEW REFERRALS. WILL CSS
4 ENTER INTO THAT CONTRACT CONSISTENT WITH LAW AND CITY
5 POLICY?

6 MS. BARCLAY: OBJECTION, YOUR HONOR.

7 THE COURT: YOU MAY ANSWER.

8 THE WITNESS: FOR THE SAKE OF THE CHILDREN
9 THAT ARE CURRENTLY IN OUR SERVICES, FOSTER PARENTS WILL
10 ENTER INTO A NEW CONTRACT WITH THE CITY, BUT WE WILL NOT
11 BEGIN TO MOVE FORWARD WITH DOING HOME STUDY FOR SAME-SEX
12 COUPLES.

13 BY MR. FIELD:

14 Q. YOU WILL ENTER INTO A NEW CONTRACT WITH THE
15 CITY, BUT WILL NOT PERFORM HOME STUDY FOR SAME-SEX
16 COUPLES?

17 A. CORRECT.

18 Q. JIM, I HAVE JUST HANDED YOU A DOCUMENT MARKED
19 DEFENDANT'S EXHIBIT 3. CAN YOU TAKE A MINUTE AND LOOK
20 THAT OVER. HAVE YOU SEEN THIS DOCUMENT BEFORE?

21 A. I HAVE.

22 Q. IS THIS A NOTICE OF AWARD THE CITY SENT TO YOU?

23 A. IT IS.

24 Q. AND THIS DOCUMENT, CAN YOU READ THE FIRST
25 PARAGRAPH THERE?

1 A. THIS LETTER IS TO PROVIDE YOU WITH INFORMATION
2 ON THE CITY OF PHILADELPHIA DHS HEREIN AND AFTER DHS
3 DEPARTMENT CONTRACT PROCESS FOR FISCAL YEAR 2019
4 BEGINNING ON JULY 1ST, 2018. THE FUNDING LEVELS
5 REFERENCED ABOVE REFLECT THE BUDGET RESTRAINTS AND
6 PRIORITIES.

7 Q. AND THE NEXT PARAGRAPH ARTICULATES THE CITY'S
8 POLICY OF NONDISCRIMINATION, CORRECT?

9 A. CORRECT.

10 Q. AND AM I READING THE SENTENCE THERE RIGHT THAT
11 SAYS THAT DHS WILL CONTINUE TO MAKE PAYMENTS TO CSS FOR
12 THE ADMINISTRATION AND MAINTENANCE OF EXISTING FOSTER
13 HOMES WHERE CHILDREN IN DHS'S CARE RESIDE?

14 A. YES.

15 MS. BARCLAY: OBJECTION, YOUR HONOR. THAT
16 CALLS FOR SPECULATION; ALSO FORM OF THE QUESTION.

17 THE COURT: OVERRULED.

18 BY MR. FIELD:

19 Q. CAN YOU READ THE THIRD AND FOURTH PARAGRAPHS
20 THERE FOR ME, PLEASE.

21 A. ADDITIONALLY, THE FY 19 CONTRACT WILL ALLOW FOR
22 REFERRALS OF NEW JOB FOSTER-CARE PLACEMENTS ONLY IN
23 LIMITED AUTHORIZED CIRCUMSTANCES WHERE CSS PLACEMENT IS
24 IN THE BEST INTERESTS OF THE CHILD. SINCE A CHILD
25 SHARES A PRIOR RELATIONSHIP WITH A FOSTER OR

1 PRE-ADOPTIVE PARENT OR WHERE SIBLINGS SHOULD BE PLACED
2 TOGETHER. THE NEW CONTRACT ALSO PROVIDES TIME FOR THE
3 ORDERLY TRANSITION OF SERVICES SHOULD THAT BECOME
4 NECESSARY. THE CONTRACT AMOUNT HAS BEEN ADJUSTED TO
5 REFLECT THE VOLUME OF SERVICES PROJECTED UNDER THE NEW
6 SCOPE OF THE CONTRACT.

7 Q. WHEN YOU SAID CSS WOULD ENTER INTO A CONTRACT
8 WITH THE CITY FOR CARE OF CHILDREN IN AN ORDERLY
9 TRANSITION, IS THIS THE TYPE OF CONTRACT YOU ARE
10 REFERRING TO?

11 MS. BARCLAY: OBJECTION, YOUR HONOR. MAY WE
12 RECEIVE A PROFFER FOR THE RELEVANCE OF THIS LINE OF
13 QUESTIONING. WE ARE NOT HAVING CONTRACT NEGOTIATIONS RIGHT
14 NOW AS PART OF THE TESTIMONY. I DON'T UNDERSTAND WHY THIS
15 IS RELEVANT TO THE MATTER AT HAND OR WITH THE SCOPE OF THE
16 DIRECT. THIS IS NOT SOMETHING THAT MR. AMATO DISCUSSED.

17 MR. FIELD: CSS HAS REPRESENTED THEY HAVE TO
18 START LAYING OFF PEOPLE IMMEDIATELY AND THAT THE HARM THE
19 BUSINESS WILL SUFFER IS IMMEDIATE AND EXTREME, AND THEIR
20 WILLINGNESS TO ENTER INTO A CONTRACT WITH THE CITY THAT WILL
21 MITIGATE THAT HARM IS DIRECTLY RELEVANT TO THIS LITIGATION.

22 THE COURT: OVERRULED.

23 THE WITNESS: LAST QUESTION AGAIN.

24 BY MR. FIELD:

25 Q. PREVIOUSLY YOU HAD SAID THAT CSS WOULD ENTER

1 INTO A CONTRACT WITH THE CITY FOR ONGOING CARE THAT DID
2 NOT REQUIRE CSS TO DO THE CERTIFICATIONS OF SAME-SEX
3 COUPLES, CORRECT?

4 A. RIGHT.

5 Q. THE NOTICE OF AWARD YOU JUST READ, IS THAT
6 GENERALLY THE TYPE OF CONTRACT YOU WERE TALKING ABOUT?

7 MS. BARCLAY: OBJECTION, YOUR HONOR, AS TO
8 SPECULATION.

9 THE COURT: OVERRULED. CAN YOU ANSWER THAT
10 QUESTION?

11 THE WITNESS: YES. THE WAY I WOULD ANSWER
12 THAT QUESTION IS BASICALLY THIS WOULD BE THE TRANSITION YEAR
13 AND WE WOULD BE -- MY PREDICTION, WE WOULD BE OUT OF THE
14 FOSTER-CARE MISSION WITHIN SEVERAL MONTHS.

15 BY MR. FIELD:

16 Q. BUT YOU WOULD ENTER INTO THAT CONTRACT?

17 MS. BARCLAY: OBJECTION, YOUR HONOR.

18 THE COURT: HE'S ANSWERED.

19 THE WITNESS: OKAY.

20 MR. FIELD: THANK YOU, YOUR HONOR.

21 PERMISSION TO APPROACH THE WITNESS, YOUR
22 HONOR?

23 THE COURT: YES.

24 BY MR. FIELD:

25 Q. MR. AMATO, JIM, I HAVE JUST HANDED YOU A LETTER

1 DATED JUNE 11TH, ADDRESSED TO YOU FROM CYNTHIA FIGUEROA?

2 A. UM-HUM.

3 Q. IT SAYS, FISCAL YEAR 2019 AWARD LETTER, TRIAL
4 WELFARE OPERATIONS PLACEMENT SERVICES CONGREGATE CARE
5 \$18,505,119. HAVE YOU SEEN THIS LETTER BEFORE?

6 A. YES.

7 Q. IS THIS A NOTICE OF AWARD FOR A NEW CONTRACT
8 RELATED TO THE -- WHAT WE TALKED ABOUT BEFORE, I
9 BELIEVE, AS GROUP CARE CONGREGATE CARE?

10 A. WHAT STRUCK ME WHEN I SAW THIS LETTER --

11 Q. CAN YOU JUST PLEASE TELL ME WHETHER THIS IS A
12 NOTICE OF AWARD FOR THE CONTRACTS OR WHAT YOU WERE
13 TALKING ABOUT UNDER THE GROUP CARE?

14 A. YES, AS THE SHORT --

15 MS. BARCLAY: OBJECTION TO SPECULATION AND HE
16 IS ASKING TO CHARACTERIZE A DIFFERENT TYPE OF DOCUMENT.

17 MR. FIELD: I AM ASKING THIS WITNESS WHAT HIS
18 UNDERSTANDING OF THIS DOCUMENT IS.

19 THE COURT: OVERRULED.

20 THE WITNESS: MY UNDERSTANDING OF THE
21 DOCUMENT, DHS HAS CONTINUED TO BE INTERESTED IN OUR DOING
22 MISSION AS USUAL IN CONGREGATE CARE, BUT SEGREGATING
23 FOSTER-CARE FROM THAT CONTRACT.

24 BY MR. FIELD:

25 Q. THIS IS A NOTICE OF AWARD FOR THE CONTRACT FOR

1 THAT CONGREGATE PORTION YOU WERE JUST TALKING ABOUT?

2 A. THAT'S MY UNDERSTANDING.

3 MS. BARCLAY: ASKED AND ANSWERED, YOUR HONOR.

4 MR. FIELD: THANK YOU. NO FURTHER QUESTIONS
5 AT THIS TIME, YOUR HONOR.

6 THE COURT: OKAY. WE WILL TAKE A BRIEF
7 RECESS AND YOU CAN REDIRECT.

8 MS. BARCLAY: THANK YOU.

9 (BRIEF RECESS.)

10 THE COURT: OKAY. YOU MAY BE SEATED.
11 REDIRECT.

12 MS. BARCLAY: YES, YOUR HONOR.

13 REDIRECT EXAMINATION

14 BY MS. BARCLAY:

15 Q. MR. AMATO, YOU WERE JUST ASKED A NUMBER OF
16 HYPOTHETICAL QUESTIONS ABOUT THE TYPE OF FOSTER PARENTS
17 THAT MIGHT ASK FOR HOME STUDY CERTIFICATIONS.

18 I JUST WANT TO CLARIFY THAT YOU WERE --
19 YOU UNDERSTOOD THOSE TYPES IN THE PROSPECTIVE FOSTER
20 FAMILY APPROACHING CATHOLIC SOCIAL SERVICES AND
21 REQUESTING HOME STUDY SERVICES; IS THAT CORRECT?

22 A. THAT IS CORRECT.

23 Q. NOW, THERE WAS SOME DISCUSSION ABOUT CSS
24 COMMUNICATIONS THE WEEK AFTER MAY 25TH REGARDING DOE
25 FOSTER CHILD NUMBER ONE, AND YOU MENTIONED THAT MR. JIM

1 BLACK HAD SOME INFORMATION ABOUT THAT INFORMATION IN THE
2 BEGINNING OF THE WEEK, CORRECT?

3 A. WELL, HE ACTUALLY -- HE RELAYED THAT TO ME IN
4 THE BEGINNING OF THE WEEK.

5 Q. RIGHT.

6 A. HIS INFORMATION WAS FROM THE NIGHT OF THE
7 EMERGENCY PLACEMENT.

8 MR. FIELD: OBJECTION. FOUNDATION.

9 MS. BARCLAY: THIS IS RELATED TO HIS WITNESS.

10 THE COURT: OVERRULED.

11 BY MS. BARCLAY:

12 Q. WAS YOUR UNDERSTANDING AT THAT POINT EARLIER IN
13 THE WEEK THAT MR. BLACK HAD ALL OF THE RELEVANT DETAILS
14 ABOUT THE SITUATION?

15 A. I THINK THE ONLY RELEVANT DETAIL THAT HAD NOT
16 EMERGED BUT EMERGED ONLY A DAY OR TWO LATER WAS THE
17 WONDERFUL NEWS THAT THE CSS FOSTER MOTHER WAS ADOPTION
18 -- IS ADOPTION-MINDED.

19 Q. ON MAY 1ST THERE WAS AN E-MAIL THAT WAS
20 DISCUSSED, AND THIS IS FROM YOU TO JESSICA SHAPIRO.

21 DO YOU STILL HAVE THAT IN FRONT OF YOU,
22 MR. AMATO?

23 A. OH, YEAH, HERE IT IS.

24 Q. I JUST WANT TO DRAW YOUR ATTENTION TO TWO
25 DIFFERENT LINES IN THIS E-MAIL. IN THE FIRST PARAGRAPH

1 IT SAYS: "CASES WITH CUA, BUT THERE ARE UNCERTAINTIES
2 ABOUT APPROVING THIS GIVEN THE FREEZE." AND YOU ALSO
3 SAY: "THIS IS IN FRONT OF CUA WITH QUESTIONS FOR CSS
4 INTAKE FREEZE."

5 CAN YOU TELL US WHAT YOU MEANT ABOUT THIS
6 UNCERTAINTY?

7 A. JUST SO I AM CLEAR, I AM LOOKING AT AN E-MAIL
8 FROM ME TO COMMISSIONER FIGUEROA ON MAY 1ST.

9 Q. THAT'S RIGHT.

10 A. ALL RIGHT. IS THAT THE REDACTED ONE THAT WE ARE
11 LOOKING AT?

12 Q. THESE LINES ARE NOT VISIBLE IN THE REDACTED
13 VERSION.

14 A. OKAY. SO CAN YOU ASK ME YOUR QUESTION AGAIN,
15 PLEASE?

16 Q. YES. SO THERE'S TWO LINES IN THE E-MAIL. IT
17 SAYS: "THE CASES WITH CUA THAT THERE'S UNCERTAINTY
18 ABOUT APPROVING THIS GIVEN THE PRESENT FREEZE."

19 THAT'S THE FIRST PARAGRAPH. AND THE
20 SECOND PARAGRAPH, IT SAYS: "THIS IS ALSO IN FRONT OF
21 CUA WITH QUESTIONS AS CSS INTAKE FREEZE."

22 CAN YOU DESCRIBE A LITTLE BIT WHAT YOU
23 MEANT ABOUT THESE QUESTIONS AND UNCERTAINTY ABOUT THE
24 INTAKE FREEZE?

25 A. AGAIN, THAT GETS BACK TO THE FACT THAT -- AND

1 THE WAY THAT I LOOK AT IT, THAT WE -- THE EXCEPTION
2 POLICY WAS NEVER ARTICULATED BY THE CITY. SO ANY TIME
3 SOMETHING CAME UP, I THOUGHT IT WAS DUE DILIGENCE AND
4 GOOD PRACTICE AND THE RIGHT THING TO DO TO GET IN TOUCH
5 WITH HIM, THE COMMISSIONER, AND TELL HER THAT THIS WAS
6 GOING ON.

7 Q. ON MAY 25TH, WHICH WAS AFTER THE STAFF -- THAT'S
8 WHEN CUA STAFF KIND OF COMMUNICATED THAT THEY WERE GOING
9 TO DENY IT BECAUSE OF THE CASE ONGOING WITH CATHOLIC
10 SOCIAL SERVICES, CORRECT?

11 A. YEAH, WELL THAT'S DOE 2, DOE 1?

12 Q. YES, BECAUSE IT WAS RELATED TO DOE 1. THEY WERE
13 GOING TO DENY THAT PLACEMENT?

14 MR. FIELD: OBJECTION, HEARSAY.

15 THE COURT: OVERRULED.

16 BY MS. BARCLAY:

17 Q. IS THAT CORRECT, MR. AMATO?

18 A. YES, THAT'S CORRECT.

19 Q. WAS PART OF YOUR CONCERN ABOUT THE DOE FOSTER
20 CHILD SITUATION THAT THAT SITUATION COULD REPEAT AGAIN
21 GIVEN THE DHS RESPONSE?

22 A. ABSOLUTELY. JUST TO GET THAT ON THE RIGHT
23 TRACK, TOOK A NUMBER OF VERY COMPLICATED AND INTENSE
24 FOLLOW-UPS. IF THAT WASN'T THERE, KIDS COULD FALL
25 THROUGH THE CRACKS EASILY.

1 Q. I WANT TO DRAW YOUR ATTENTION TO SOME OF THE
2 DISCUSSIONS ABOUT ADDITIONAL POTENTIAL CONTRACTS WITH
3 THE CITY.

4 NOW, IF THE CITY WERE OFFERING WHAT THEY
5 HAVE DESCRIBED AS A FULL CONTRACT THAT ALLOWED CATHOLIC
6 SOCIAL SERVICES TO CONTINUE TO PROVIDE FOSTER-CARE,
7 CONSISTENT WITH ITS RELIGIOUS BELIEFS, AS IT HAS DONE
8 FOR OVER 50 YEARS, WOULD CATHOLIC SOCIAL SERVICES BE
9 ABLE TO CONTINUE PROVIDING SERVICES?

10 A. CERTAINLY.

11 Q. AND IN FACT, IF THE CITY AGREED TO THAT, WOULD
12 THERE EVEN BE A NEED FOR THIS LAWSUIT?

13 A. ABSOLUTELY NOT.

14 Q. SO WITH THE PARTIAL CONTRACT THAT THEY HAVE,
15 DRAWING YOUR ATTENTION TO THE PARTIAL AWARD LETTER AND
16 THE E-MAIL FROM JONATHAN JANISZEWSKI -- I APOLOGIZE IF I
17 AM SAYING THAT WRONG, WHAT IS YOUR UNDERSTANDING WILL
18 BE --

19 MR. FIELD: OBJECTION TO THE CHARACTERIZATION
20 AS IT BEING PARTIAL, YOUR HONOR.

21 THE COURT: SUSTAINED.

22 JUST REPHRASE.

23 BY MS. BARCLAY:

24 Q. IN THE E-MAIL FROM JONATHAN JANISZEWSKI, THAT AT
25 THE THIRD PARAGRAPH TO YOU IT SAYS: "DHS STILL INTENDS

1 TO SEND YOU AN OFFICIAL AWARD TO PREPARE FOR A NEW
2 CONTRACT UNDER THE TERMS DESCRIBED ABOVE. YOU SHOULD
3 ANTICIPATE RECEIVING DHS'S OFFICIAL AWARD LETTER LATER
4 THIS WEEK."

5 DID YOU UNDERSTAND THAT AWARD LETTER TO
6 BE THE OTHER DOCUMENT THAT WAS WRITTEN BY CYNTHIA
7 FIGUEROA ON JUNE 11TH?

8 A. NO. AGAIN, THE JUNE 11TH WENT TO ME. I AM
9 GOING IN REVERSE ORDER HERE, SIMPLY VERIFIED THAT DHS
10 CONTINUES TO WANT THE CONTRACT AND NEED OUR CONGREGATE
11 CARE SERVICES. THE JUNE 5TH MEMO, BASICALLY, TO ME IN A
12 NUTSHELL IS, YOU EITHER FOLLOW ACCORDING TO THE
13 PROVISIONS THAT DHS PROVIDED, OR YOU ARE BASICALLY GOING
14 -- THAT MISSION IS GOING TO EVAPORATE OVER TIME.

15 Q. I SHOULD CLARIFY. ALL OF MY QUESTIONS ARE GOING
16 TO BE IN THE CONTEXT OF YOUR FOSTER-CARE PROGRAM, AND
17 WE'RE NOT TALKING ABOUT ANY OF THE OTHER CARE PROGRAMS
18 RIGHT NOW.

19 A. OH, OKAY.

20 Q. SO IF YOU LOOK AT THIS JUNE 11, 2018 LETTER, IT
21 SAYS: "THE FY19 CONTRACT WILL ALLOW FOR REFERRALS OF
22 NEW CHILD AND FOSTER-CARE PLACEMENT ONLY IN LIMITED
23 AUTHORIZED CIRCUMSTANCES WHERE CSS PLACEMENT IS IN THE
24 BEST INTEREST OF THE CHILD, SUCH AS FOR THE CHILD SHARES
25 A PRIOR RELATIONSHIP WITH FOSTER PREADOPTIVE PARENTS, OR

1 WHERE SIBLINGS SHOULD BE PLACED TOGETHER. THE NEW
2 CONTRACT WILL ALSO PROVIDE TIME FOR THE ORDERLY
3 TRANSITION OF SERVICES SHOULD THAT BECOME NECESSARY."

4 DID YOU UNDERSTAND, THIS DOCUMENT THAT
5 THE CITY IS CALLING AN AWARD LETTER, TO BE THE NORMAL
6 TYPE OF AWARD LETTER YOU WOULD RECEIVE FOR THE FULL
7 CONTRACT?

8 A. OH, NO, IT'S SUBSTANTIALLY DIFFERENT.

9 Q. SO UNDER THIS ARRANGEMENT, WHAT WOULD BE THE
10 CONSEQUENCE IN A MATTER -- THE CONSEQUENCE TOWARD THE
11 CATHOLIC SOCIAL SERVICES FOSTER PROGRAM?

12 A. SADLY, ALL STAFF WOULD BE LAID OFF, AND THE
13 PROGRAM WOULD CEASE.

14 Q. NOW, I WOULD ALSO LIKE TO DIRECT YOUR ATTENTION
15 TO ANOTHER LETTER FROM THE CITY.

16 MS. BARCLAY: PERMISSION TO APPROACH THE
17 WITNESS, YOUR HONOR.

18 THE COURT: YES.

19 BY MS. BARCLAY:

20 Q. MR. AMATO, I AM APPROACHING YOU WITH WHAT HAS
21 BEEN MARKED PLAINTIFF'S EXHIBIT NUMBER 13. I AM GOING
22 TO DRAW YOUR ATTENTION, MR. AMATO, IF YOU TURN NOT TO
23 THE FIRST PAGE, NOT THE SECOND PAGE, BUT THE THIRD PAGE,
24 AND THERE'S A PARAGRAPH IN THE MIDDLE?

25 A. UM-HUM.

1 Q. IT SAYS: "PLEASE ALSO NOTE THAT CSS'S CURRENT
2 NEW CONTRACT EXPIRES ON JUNE 30TH, 2018, AND THE CITY IS
3 UNDER NO LEGAL OBLIGATION TO ENTER INTO A NEW CONTRACT
4 FOR ANY PERIOD THEREAFTER. WE ARE HOPEFUL THAT WE CAN
5 WORK OUT ANY DIFFERENCES BEFORE THEN, BUT PLEASE BE
6 ADVISED THAT EXCEPT FOR IN THE BEST INTEREST OF THE
7 CHILD ^DEMANDS OTHERWISE, THE CITY DOES NOT PLAN TO
8 AGREE TO ANY FURTHER REFERRALS TO CSS, AND THE CITY
9 INTENDS TO ASSIST WITH THE TRANSITION OF FOSTER FAMILIES
10 TO OTHER AGENCIES ABSENT ASSURANCES THAT CSS IS PREPARED
11 TO ADHERE TO CONTRACTUAL OBLIGATIONS, AND AN IMPLICATION
12 OF CITY CONTRACT TO COMPLY WITH ALL APPLICABLE LAWS,
13 INCLUDING THOSE RELATING TO NONDISCRIMINATION. WE
14 BELIEVE OUR CURRENT CONTRACT WITH CSS IS QUITE CLEAR
15 THAT THIS IS OUR RIGHT, BUT PLEASE BE ADVISED THAT ANY
16 FURTHER CONTRACT WITH CSS WILL BE EXPLICIT IN THIS
17 REGARD."

18 WHAT WAS YOUR UNDERSTANDING ABOUT THE
19 MEANING OF THIS COMMUNICATION FROM THE CITY?

20 A. QUITE FRANKLY, THEY WERE ON A SHORT ROPE AND
21 THAT REFERRALS -- THEY CARRY US OVER UNTIL THE PROGRAM
22 BASICALLY DRIED UP IN A MATTER OF MONTHS, AND WE WOULD
23 HAVE NO FOSTER-CARE PROGRAM.

24 Q. THIS LAST SENTENCE: "WE BELIEVE OUR CURRENT
25 CONTRACT WITH CSS IS QUITE CLEAR THAT IS OUR RIGHT, BUT

1 PLEASE BE ADVISED THAT ANY FURTHER CONTRACT WITH CSS
2 WILL BE EXPLICIT IN THIS REGARD."

3 DID THIS GIVE AN INDICATION THAT
4 POTENTIALLY FUTURE FULL CONTRACTS, AS THE CITY
5 CHARACTERIZES THEM, WOULD HAVE DIFFERENT CONTRACT TERMS
6 THAN YOU HAVE SEEN IN THE PAST?

7 A. YES.

8 Q. AND WOULD YOU NEED TO REVIEW CONTRACT TERMS OF A
9 NEW FULL CONTRACT TO ENSURE THAT YOU COULD CONTINUE TO
10 PROVIDE FOSTER-CARE SERVICES CONSISTENT WITH YOUR
11 RELIGIOUS BELIEFS, AS YOU HAVE DONE FOR THE LAST
12 50 YEARS?

13 A. YES.

14 Q. IS IT YOUR POSITION, MR. AMATO, THAT THE PRODUCT
15 OF A FINAL HOME STUDY INCLUDES A WRITTEN ENDORSEMENT OF
16 ANY RELEVANT RELATIONSHIPS OF THE FOSTER PARENT?

17 A. IT IS.

18 Q. THAT'S YOUR SINCERE BELIEF, CORRECT?

19 A. IT IS.

20 Q. AND THE SINCERE BELIEF OF CATHOLIC SOCIAL
21 SERVICES?

22 A. YES.

23 Q. NOW, IS IT YOUR UNDERSTANDING THAT EVALUATION OF
24 THE RELATIONSHIPS OF THE PARENTS IS REQUIRED BY STATE
25 LAW FOR A HOME STUDY?

1 A. YES.

2 Q. I JUST WANT TO DIRECT YOUR ATTENTION TO THE 3700
3 REGULATIONS DOT 64. YOU ARE FAMILIAR WITH THE
4 REQUIREMENT UNDER (A)(3)(B)(1) THAT AN AGENCY EVALUATE,
5 QUOTE: "EXISTING FAMILY RELATIONSHIPS ADDED TO AND
6 EXPECTATIONS REGARDING THE APPLICANT'S OWN CHILDREN AND
7 PARENT-CHILD RELATIONSHIPS, ESPECIALLY THAT THEY MIGHT
8 AFFECT A FOSTER CHILD." CORRECT?

9 A. YES.

10 Q. AND YOU ALSO UNDERSTOOD THAT UNDER THIS STATE
11 LAW, CATHOLIC SOCIAL SERVICES IS ENTITLED AND INDEED
12 REQUIRED TO EVALUATE THE ABILITY OF THE APPLICANT TO
13 WORK IN PARTNERSHIP WITH CATHOLIC SOCIAL SERVICES,
14 CORRECT?

15 A. YES.

16 Q. AND IT WAS YOUR UNDERSTANDING THAT THIS STATE
17 LAW REQUIREMENT MEANT THAT YOU, TO PERFORM AN ADEQUATE
18 HOME STUDY, NEEDED TO EVALUATE THE RELATIONSHIPS OF ANY
19 FOSTER PARENT LIVING IN THE SAME HOME, CORRECT?

20 A. YES.

21 MS. BARCLAY: JUST ONE MOMENT, YOUR HONOR.

22 THANK YOU, MR. AMATO. NO FURTHER QUESTIONS.

23 THE COURT: ANY OTHER QUESTIONS?

24 MR. FIELD: JUST TWO BRIEF QUESTIONS, YOUR
25 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?

1 A. YES.

2 Q. THEY DON'T SPECIFICALLY REFER TO CATHOLIC SOCIAL
3 SERVICES, RIGHT?

4 A. NO.

5 Q. DOES ANYWHERE IN THE REGS TALK ABOUT THE ABILITY
6 OF THE AGENCY TO WORK WITH THE APPLICANT, TO YOUR
7 KNOWLEDGE?

8 MS. BARCLAY: OBJECTION, YOUR HONOR. IT'S
9 ASKING FOR A LEGAL QUESTION, AND AS FAR AS QUOTING FROM
10 REGS, HE MAY NOT BE AWARE OF.

11 MR. FIELD: I AM ASKING, TO HIS KNOWLEDGE, IS
12 IT IN THE REGULATIONS, AND NOT ASKING HIM TO INTERPRET THE
13 LEGAL MEANING OF THAT.

14 THE COURT: OVERRULED.

15 THE WITNESS: CAN YOU PLEASE ASK ME THAT
16 AGAIN?

17 BY MR. FIELD:

18 Q. DO THE REGULATIONS ANYWHERE, TO YOUR KNOWLEDGE,
19 REFER TO OR DISCUSS THE ABILITY OF THE AGENCY TO WORK
20 WITH THE APPLICANT OR AN AGENCY TO WORK WITH AN
21 APPLICANT?

22 A. NOT TO MY KNOWLEDGE.

23 MR. FIELD: THANK YOU. I HAVE NOTHING
24 FURTHER, YOUR HONOR.

25 THE COURT: OKAY. ANY OTHER QUESTIONS?

1 MS. BARCLAY: NOTHING FURTHER, YOUR HONOR.

2 THE COURT: OKAY. THANK YOU, MR. AMATO.

3 DOES THE PLAINTIFF HAVE ANY FURTHER
4 WITNESSES?

5 MS. WINDHAM: YOUR HONOR, WE DO NOT HAVE ANY
6 FURTHER WITNESSES. HOWEVER, WE DO WANT TO MAKE TWO MOTIONS.
7 ONE MOTION FIRST TO MOVE THE ADMISSION OF THE DOCUMENTS THAT
8 WERE ATTACHED TO THE JAMES AMATO DECLARATION. WE HAVE ABOUT
9 20 DIFFERENT DOCUMENTS, WHICH WERE ATTACHED TO THAT
10 DECLARATION, AND HE AUTHENTICATED THOSE DOCUMENTS WITHIN
11 THAT DECLARATION.

12 DEFENDANT DID HAVE THE OPPORTUNITY TO RESPOND
13 OR OBJECT TO THOSE THROUGH THEIR BRIEFING, AND WE BELIEVE
14 THOSE SHOULD BE ALLOWED IN AT THIS TIME.

15 WE ALSO WOULD MOVE FOR THE ADMISSION OF ALL
16 OF PLAINTIFFS' DECLARATION, INCLUDING THE DECLARATIONS OF
17 JAMES BLACK, BISHOP MCINTYRE, AND DOE FOSTER MOTHER NUMBER
18 1.

19 MR. FIELD: YOUR HONOR, WE WOULD OPPOSE BOTH
20 OF THOSE MOTIONS. THERE IS AN OPPORTUNITY HERE TO INTRODUCE
21 DOCUMENTS, AND OBTAIN TESTIMONY FROM JIM AMATO REGARDING ANY
22 MATTERS THAT PLAINTIFFS BELIEVE RELEVANT TO THIS, AND WE
23 HAVE ALREADY OPPOSED THE INTRODUCTION AND TRIAL OF THIS BY
24 AFFIDAVIT IN THE INTRODUCTION OF AFFIDAVITS OF WITNESSES WHO
25 ARE NOT PRESENT AT THIS HEARING.

1 MS. WINDHAM: YOUR HONOR, WITH REGARD TO DOE
2 FOSTER MOTHER NUMBER 1, DEFENDANTS DID NOT OBJECT TO THE
3 ADMISSION OF HER TESTIMONY YESTERDAY. SHE WAS ACTUALLY HERE
4 YESTERDAY. AND WE UNDERSTOOD THAT THEY WERE PLANNING TO
5 OBJECT TO THE ADMISSION OF HER DECLARATION IF WE WOULD HAVE
6 HAD HER ON THE STAND. SHE WAS NOT ABLE TO GO HERE TODAY.
7 WE ASKED HER TO BE HERE TODAY.

8 SO WE FEEL THAT THIS WOULD BE AN UNFAIR BAIT
9 AND SWITCH BY THE DEFENDANTS, AND NOW THAT SHE IS NOT HERE,
10 MOVE TO EXCLUDE HER WHEN THEY DID NOT MOVE SO YESTERDAY.

11 MR. FIELD: YOUR HONOR, I DON'T BELIEVE
12 DEFENDANT'S MOTION YESTERDAY TO EXCLUDE THE AFFIDAVITS --
13 AFFIDAVITS OF WITNESSES WHOSE TESTIMONY WAS NOT TAKEN WAS AT
14 ALL AMBIGUOUS. IT WAS ACROSS ALL OF THE EVIDENCE THAT
15 PLAINTIFFS WISH TO INTRODUCE IN THIS HEARING.

16 MS. WINDHAM: YOUR HONOR, YESTERDAY THEY
17 SPECIFICALLY LISTED JAMES AMATO, JAMES BLACK, AND BISHOP
18 MCINTYRE. THEY DID NOT MENTION FOSTER MOTHER NUMBER 1. WE
19 WOULD HAVE PUT HER ON THE STAND, IF WE HAD KNOWN.

20 MR. FIELD: YOUR HONOR, THOSE WERE EXAMPLES
21 OF AFFIANTS THAT THEY WERE NOT INTRODUCING.

22 THE COURT: SINCE DOE FOSTER MOTHER NUMBER 1
23 WAS PRESENT YESTERDAY, AND COULD NOT BE PRESENT TODAY, I'M
24 GOING TO PERMIT THE AFFIDAVIT. HOWEVER, THE OTHER EXHIBITS,
25 I'M NOT GOING TO PERMIT.

1 MS. WINDHAM: YOUR HONOR, TO CLARIFY, ARE YOU
2 SPEAKING ABOUT THE OTHER AFFIDAVITS, OR ARE YOU SPEAKING --

3 THE COURT: EXHIBITS AND THE AFFIDAVITS. THE
4 EXHIBITS, MY UNDERSTANDING IS THEY WERE ATTACHED TO THE
5 AFFIDAVIT OF MR. AMATO, WHO HAS TESTIFIED HERE TODAY.

6 MS. WINDHAM: YES, YOUR HONOR. THOSE WERE
7 ATTACHED TO HIS DECLARATION, AND THEY WERE PROPERLY
8 AUTHENTICATED IN HIS DECLARATION. WE DID NOT WALK THROUGH
9 AND INTRODUCE EVERY SINGLE ONE OF THOSE TODAY IN ORDER TO
10 SAVE TIME.

11 THE COURT: WELL, TIME IS NOT A PROBLEM. IF
12 YOU WANT TO HAVE THEM ADMITTED, THEN YOU NEED TO DO IT SINCE
13 MR. AMATO IS HERE.

14 MS. WINDHAM: YOUR HONOR, MAY WE HAVE A QUICK
15 RECESS TO LOOK AT THOSE DOCUMENTS AND DETERMINE WHICH WE
16 NEED TO ADMIT?

17 THE COURT: OKAY. YOU CAN HAVE DISCUSSION
18 WITH COUNSEL.

19 (BRIEF RECESS.)

20 THE COURT: ARE WE READY?

21 MS. CORTES: JUST ONE MORE MOMENT, YOUR
22 HONOR.

23 MR. FIELD: YOUR HONOR, CAN WE APPROACH FOR
24 SIDEBAR CONCERNING THIS MATTER?

25 THE COURT: YES.

1 (SIDEBAR OCCURRED.)

2 MS. BARCLAY: WE CAN TELL YOU WHICH
3 ATTACHMENTS TO JIM AMATO'S DECLARATION WE HAVE AGREED TO,
4 YOUR HONOR. IT IS ATTACHMENT B, ATTACHMENT C.

5 THE COURT: B, C?

6 MS. BARCLAY: B AS IN BOY, C AS IN CAT, D AS
7 IN DOG, AND ATTACHMENT I AS IN IGLOO.

8 THERE ARE SOME ADDITIONAL DOCUMENTS THAT WE
9 WOULD LIKE TO ADMIT. THEY ARE WEBSITE OR NEWS REPORTS THAT
10 ARE FRANKLY JUDICIALLY NOTICEABLE, BUT FOR EASE OF
11 REFERENCE, SO THEY ARE PART OF THE RECORD, WE WOULD LIKE TO
12 ADMIT THEM AS WELL. WOULD YOU LIKE US TO PUT MR. AMATO ON
13 THE STAND FOR THOSE, YOUR HONOR?

14 MR. FIELD: YOUR HONOR, OUR OBJECTION TO
15 THOSE AND THE REASON I ASKED FOR THE SIDEBAR IS THAT I DON'T
16 THINK WE NECESSARILY NEED TO DO THIS ON STAND. WE CAN
17 RESOLVE THIS THAT WOULD BE BOTH RELEVANT AND FOUNDATION AS
18 TO MR. AMATO'S ACTUAL KNOWLEDGE OF THOSE DOCUMENTS, AND I
19 LEAVE IT TO THE COURT. I DON'T THINK THEY ARE APPROPRIATE
20 AND RELEVANT TO THIS.

21 THE COURT: WHAT THEY ARE ARE NEWS REPORTS?

22 MS. BARCLAY: HERE IS AN EXAMPLE OF ONE
23 REPORT, YOUR HONOR, THE ONE TALKING ABOUT SOME OF MAYOR
24 KENNEY'S COMMENTS WITH REGARD TO THE ARCHDIOCESE THAT ARE
25 RELEVANT TO CONCERNS ABOUT HOSTILITY OF RELIGIOUS OFFICIALS,

1 AND THESE HAVE ALL BEEN AUTHENTICATED TO THE DECLARATION.

2 THE COURT: WHETHER THEY ARE RELEVANT, THAT'S
3 CLEARLY AN OPINION PIECE.

4 MS. BARCLAY: IT DOES HAVE SOME QUOTES FROM
5 HIM.

6 THE COURT: I AM SURE, BUT IT'S FROM THE
7 PHILADELPHIA MAGAZINE, AND THAT'S AN OPINION PIECE.

8 MS. BARCLAY: WE WOULD AGREE THAT ALL OF THE
9 AWKWARD WORDS ARE NOT PARTICULARLY RELEVANT. IT IS THE
10 QUOTES THAT THEY HAVE COLLECTED FROM MAYOR KENNEY THAT WE
11 THINK ARE RELEVANT.

12 MS. CORTES: AND, YOUR HONOR, AGAIN, IT WOULD
13 BE OUR POSITION THAT THAT IS IRRELEVANT TO THESE
14 PROCEEDINGS. IT IS IRRELEVANT TO THIS PARTICULAR MATTER.
15 THIS ARTICLE WAS WRITTEN IN 2015. WE ARE TALKING ABOUT
16 CONTRACT NEGOTIATIONS OF 2018, THREE YEARS LATER.

17 MR. FIELD: YOUR HONOR, THEY ARE NOT AN
18 AUTHENTICATION, THE QUOTES.

19 MS. CORTES: OR THE FULL CONTEXT, YOUR HONOR.

20 MS. BARCLAY: THERE IS ALSO, YOUR HONOR, WEB
21 PAGES THAT WE HAVE BEEN TALKING ABOUT, SOME OF THE
22 SPECIALTIES OF SOME AGENCIES AND PROGRAMS LIKE THE
23 BEHAVIORAL HEALTH SPECIALTY OR THE SPECIAL MEDICAL SPECIALTY
24 THAT ARE RELEVANT TO THE TYPES OF NEEDS AND POPULATIONS THAT
25 FOSTER-CARE AGENCIES SERVE AND WE BELIEVE THAT ALSO WOULD BE

1 RELEVANT TO THESE PROCEEDINGS.

2 THE COURT: WELL, YOU HAVE TESTIMONY IN THAT
3 REGARD.

4 MS. BARCLAY: WE CAN, YOUR HONOR.

5 THE COURT: I MEAN, YOU HAVE ALREADY HAD
6 TESTIMONY.

7 MS. BARCLAY: I SEE.

8 THE COURT: WE HAVE HAD MORE THAN ENOUGH
9 TESTIMONY AS FAR AS THE SPECIALIZATION.

10 MR. RIENZI: YOUR HONOR, MAY I MAKE A
11 SUGGESTION? ONE POSSIBILITY WOULD BE THESE ARE ITEMS THAT
12 -- YOU KNOW, THEY ARE WEBSITES AND NEWS ARTICLES THAT I AM
13 SURE YOU HAVE HAD LITIGANTS CITE TO YOU IN BRIEFS AND THINGS
14 LIKE THAT AND ASK YOU TO TAKE JUDICIAL NOTICE OF ANYWAY.
15 ONE POSSIBILITY WOULD BE YOU DON'T NECESSARILY NEED TO RULE
16 EITHER WAY ON WHETHER THEY COME NOW. PEOPLE CAN JUST MAKE
17 ARGUMENTS FROM THEM AND YOU CAN DO WITH THEM WHAT YOU WILL,
18 WHICH OF COURSE IS YOUR PREROGATIVE ANYWAY. IT SEEMS LIKE
19 IT WOULD BE UNNECESSARY AND WASTEFUL OF COURT TIME TO PUT
20 HIM BACK ON THE STAND TO HAVE HIM SAY STUFF THAT EVERYBODY
21 KNOWS WHAT HE IS GOING TO SAY JUST TO DRAW A RULING OR YOUR
22 CONSIDERATION.

23 MS. CORTES: YOUR HONOR, WE WOULD AGREE WITH
24 THAT PART. WE DON'T THINK IT IS NECESSARY FOR HIM TO GO ON
25 THE STAND. AGAIN, OUR OBJECTIONS ARE MORE SO TO THE

1 RELEVANCE AS TO THE VARIOUS WEBSITES OF THE DIFFERENT
2 SPECIALTY NEEDS. I WOULD AGREE WITH YOUR HONOR THAT THERE
3 HAS BEEN PLENTY OF TESTIMONY ON THAT. I THINK THE OBJECTION
4 IS MORE SO THAT THEY ARE DUPLICATIVE OF THE TESTIMONY THAT
5 YOUR HONOR HAS ALREADY TAKEN NOTICE OF.

6 AS TO THE ARTICLES REGARDING MAYOR KENNEY'S
7 WORDS REGARDING THE ARCHDIOCESE, IT'S OUR POSITION THAT
8 THOSE ARE IRRELEVANT.

9 MR. RIENZI: WE WOULD STRONGLY DISAGREE AS TO
10 THE RELEVANCE OF MAYOR KENNEY'S STATEMENTS ABOUT THE
11 ARCHDIOCESE, AND AS TO WHETHER OR NOT SOME OF THEM ARE
12 DUPLICATIVE, I WOULD SIMPLY SAY I CAN'T SEE OR IMAGINE ANY
13 HARM FOR THE COURT OR ANYBODY ELSE TO SIMPLY LETTING THEM
14 IN.

15 MS. BARCLAY: AND THERE'S ANOTHER ARTICLE WE
16 CAN PRESENT THAT I BELIEVE IS THIS YEAR, ONE OF THOSE
17 ARTICLES SO IN AS FAR AS THE CONCERN IS ABOUT THE TIMELINE,
18 AND GIVEN MR. AMATO'S TESTIMONY TODAY, THAT HE WAS TOLD BY
19 DHS OFFICIALS THAT THIS HAD THE EYES OF THE TOP OFFICIALS IN
20 THE CITY, THIS ISSUE, WE THINK THAT MAYOR KENNEY'S COMMENTS
21 ARE RELEVANT TO THE TYPE OF MOTIVATION AND HOSTILITY, IF ANY
22 AT ISSUE IN THIS CASE, REGARDING CATHOLIC SOCIAL SERVICES
23 RELIGIOUS BELIEFS.

24 THE COURT: I AM NOT GOING TO PERMIT IT. I
25 DON'T THINK IT'S RELEVANT. I DON'T THINK IT'S ADMISSIBLE.

1 IT IS AN OPINION PIECE, IT'S SOMEBODY'S OPINION. THE
2 INTERPRETATION IS SOMEBODY ELSE'S INTERPRETATION. AND SO
3 I'M NOT GOING TO PERMIT THE ARTICLE.

4 AS FAR AS THE SPECIALIZATION, HE HAS ALREADY
5 TESTIFIED TO THAT AND I DON'T THINK YOU WILL BE PREJUDICED
6 AS NECESSARY TO BRING IN THE ARTICLES.

7 MS. BARCLAY: THANK YOU, YOUR HONOR.

8 MR. RIENZI: THANK YOU, YOUR HONOR.

9 MR. FIELD: THANK YOU, YOUR HONOR.

10 (SIDEBAR CONCLUDED.)

11 THE COURT: OKAY. DOES THE PLAINTIFF REST?

12 MS. WINDHAM: YES, YOUR HONOR, PLAINTIFFS
13 REST.

14 THE COURT: OKAY. DOES THE CITY HAVE ANY
15 WITNESSES?

16 MS. OLIVER: YES, YOUR HONOR. AT THIS TIME I
17 CALL KIMBERLY ALI.

18 MS. ALI.

19 THE COURT: OKAY.

20 MS. OLIVER: THANK YOU, YOUR HONOR.

21 BY MS. OLIVER:

22 Q. MS. ALI, YOU HEARD THE TESTIMONY OF MR. AMATO
23 TODAY WHEREIN HE INDICATED THAT DOE FOSTER CHILD NUMBER
24 1, FORMER FOSTER PARENT, DOE FOSTER PARENT NUMBER 1
25 DESIRED TO HAVE HIM BACK IN HER CARE?

1 A. YES.

2 Q. FIRST OF ALL, WOULD YOU INFORM THE COURT, AS TO
3 YOUR KNOWLEDGE, WHY DOE FOSTER CHILD NUMBER 1 WAS
4 REMOVED FROM DOE FOSTER PARENT NUMBER 1'S CARE?

5 A. YES, DOE FOSTER CHILD NUMBER 1 WAS REMOVED FROM
6 DOE FOSTER MOTHER NUMBER 1'S HOME BECAUSE THE FOSTER
7 PARENT DID NOT WANT TO ADOPT DOE FOSTER CHILD NUMBER 1,
8 SO HE WAS MOVED --

9 MS. BARCLAY: OBJECTION TO SPECULATION, YOUR
10 HONOR.

11 THE COURT: ON WHAT DO YOU BASE THIS?

12 THE WITNESS: I BASE THAT ON TELEPHONE
13 CONVERSATIONS WITH THE CUA CASE MANAGER, THE CATHOLIC SOCIAL
14 SERVICES CUA CASE MANAGER.

15 MS. BARCLAY: OBJECTION AS TO HEARSAY, YOUR
16 HONOR.

17 THE COURT: OVERRULED.

18 BY MS. OLIVER:

19 Q. AND WHEN DID YOU LEARN THAT DOE FOSTER MOTHER
20 NUMBER 1 DESIRED TO HAVE DOE FOSTER CHILD RETURNED TO
21 HER CARE?

22 A. I LEARNED THAT ON THE EVENING OF MAY 25TH AT
23 APPROXIMATELY 10:16 P.M.

24 Q. 2018?

25 A. YES.

1 Q. AND HOW DID YOU LEARN THAT?

2 A. I LEARNED THAT VIA A TEXT FROM JIM BLACK.

3 MS. OLIVER: YOUR HONOR, MAY I APPROACH THE
4 WITNESS?

5 THE COURT: YES.

6 MS. OLIVER: YOUR HONOR, I HAVE HANDED THE
7 WITNESS WHAT HAS BEEN MARKED AS DEFENSE EXHIBIT NUMBER 5.
8 FOR THE COURT'S INFORMATION, WE FILED AN UNREDACTED COPY
9 UNDER SEAL, AND I HAVE HANDED THE WITNESS A REDACTED COPY
10 FOR THE PURPOSE OF TODAY'S HEARING.

11 THE COURT: YES.

12 BY MS. OLIVER:

13 Q. MS. ALI, WILL YOU PLEASE TAKE A LOOK AT THIS
14 EXHIBIT?

15 A. YES.

16 Q. DO YOU RECOGNIZE IT?

17 A. YES.

18 Q. WHAT IS IT?

19 A. IT'S A TEXT MESSAGE BETWEEN JIM BLACK AND
20 MYSELF.

21 Q. I WOULDN'T HAVE YOU READ THE EXHIBIT IN ITS
22 ENTIRETY, BUT WITH RESPECT TO PAGE 1, WILL YOU PLEASE
23 READ THE CONTENT OF THAT TEXT INTO THE RECORD?

24 A. "FRIDAY, MAY 25TH, 10:16 P.M. HI KIM, SORRY TO
25 BOTHER YOU ON A FRIDAY NIGHT OF A HOLIDAY WEEKEND, BUT

1 WE HAVE A BOY WHO WAS MOVED EARLIER THIS MONTH FROM ONE
2 OF CSS FOSTER HOMES TO A PREADOPTIVE HOME OF ANOTHER
3 AGENCY. FOR SOME REASON THE PLACEMENT HAS NOT WORKED
4 OUT, AND CUA 4 CONTACTED OUR FOSTER MOTHER WHO WILL TAKE
5 THE CHILD BACK. BUT DHS SUPPOSEDLY JUST TOLD THE CASE
6 MANAGER THE CHILD COULD NOT GO BACK TO OUR HOME.
7 WANTING TO DO THE BEST THING FOR THE CHILD OF COURSE.
8 I'LL FOLLOW YOUR LEAD."

9 Q. AND DID YOU SEND A REPLY TO THAT TEXT MESSAGE TO
10 MR. BLACK?

11 A. YES, I DID.

12 Q. AND WHAT WAS THE CONTENT OF YOUR REPLY?

13 A. WOULD YOU LIKE ME TO READ IT?

14 Q. PLEASE.

15 A. "HEY JIM, IS THE PLACEMENT MOVE AN EMERGENCY FOR
16 TONIGHT? IF NOT WE CAN MAKE THE MOVE ON TUESDAY AFTER
17 GETTING THE APPROVAL DUE TO JUDICIAL RULES THAT
18 PLACEMENTS MUST BE APPROVED. ONLY TIME CAN MAKE THE
19 MOVE WITHOUT COURT APPROVAL, AS YOU KNOW, AS IF IT IS AN
20 EMERGENCY. LET ME KNOW."

21 Q. OKAY. AND FINALLY, DID MR. BLACK REPLY?

22 A. YES.

23 Q. PLEASE DIRECT YOUR ATTENTION TO PAGE -- THE
24 THIRD PAGE OF THIS EXHIBIT. AND WHY DON'T YOU READ ONLY
25 AFTER THE SECOND REDACTION WHERE IT BEGINS "BUT THE GOOD

1 NEWS IS"?

2 A. THAT WAS FRIDAY, MAY 25TH AT 11:58 P.M. "BUT
3 THE GOOD NEWS IS I JUST LEARNED THAT IS NOW SAFELY IN
4 ANOTHER DEVEREUX FOSTER HOME, SO NO NEED TO INVOLVE CSS
5 FOSTER CHILD 1. SORRY TO HAVE BOTHERED YOU. I REALLY
6 APPRECIATE YOUR HELP. HAVE A TERRIFIC HOLIDAY. JIM."

7 Q. THANK YOU. AND SUBSEQUENT TO HAVING THIS
8 CORRESPONDENCE WITH MR. BLACK, DID IT THEN COME TO YOUR
9 ATTENTION THAT DOE FOSTER CHILD 1 NEEDED TO BE REMOVED
10 FROM THE DEVEREUX FOSTER HOME?

11 A. NO. PRIOR TO JIM BLACK'S OUTREACH IS THE
12 QUESTION? WHAT IS THE QUESTION?

13 Q. NO. MY QUESTION IS IN THIS TEXT MESSAGE, ISN'T
14 IT CORRECT THAT MR. BLACK INDICATED THAT NO NEED TO
15 INCLUDE CSS IN THIS ISSUE ANYMORE. IT'S BEEN RESOLVED
16 ESSENTIALLY?

17 A. YES.

18 Q. BUT DID YOU THEN COME TO LEARN THAT THE CHILD
19 NEEDED TO MOVE FROM THE DEVEREUX FOSTER HOME, WHERE HE
20 WAS?

21 A. HE WAS MOVED FROM THE DEVEREUX FOSTER HOME INTO
22 A RESPITE HOME, WHERE HE HAS REMAINED EVER SINCE.

23 Q. DID IT COME TO YOUR ATTENTION AGAIN THAT DOE
24 FOSTER MOTHER NUMBER 1 ONCE AGAIN DESIRED TO HAVE THE
25 CHILD RETURNED TO HER CARE?

1 A. YES.

2 Q. AND HOW DID THAT COME TO YOUR ATTENTION?

3 A. THAT CAME TO MY ATTENTION ON JUNE 5TH AFTER A
4 CONVERSATION THAT I HAD WITH FIRST DEPUTY COMMISSIONER
5 SHAPIRO.

6 Q. OKAY. AND ESSENTIALLY WHAT WAS THE SUBSTANCE OF
7 THAT CONVERSATION?

8 A. THE SUBSTANCE OF THE CONVERSATION WAS THAT SHE
9 WAS BRINGING ME UP TO SPEED IN REFERENCE TO THE
10 LITIGATION, THE PENDING LITIGATION, SHE TOLD ME THE
11 SCENARIO, AND I TOLD HER --

12 MS. BARCLAY: OBJECTION AS TO HEARSAY, YOUR
13 HONOR.

14 THE COURT: WELL, SHE SAID -- SHE DIDN'T SAY
15 WHAT SHE TOLD HER. SHE BROUGHT HER UP TO SPEED.

16 AND AS A RESULT OF WHAT SHE SAID, WHAT DID
17 YOU DO?

18 THE WITNESS: I TOLD HER THAT I WAS FAMILIAR
19 -- I THOUGHT THAT I WAS FAMILIAR WITH DOE FOSTER CHILD
20 NUMBER 1.

21 BY MS. OLIVER:

22 Q. AND DID YOU -- ULTIMATELY, WAS DOE FOSTER CHILD
23 NUMBER 1 RETURNED TO -- STRIKE THAT.

24 ULTIMATELY, WAS DOE FOSTER CHILD NUMBER 1
25 RETURNED TO DOE FOSTER MOTHER 1'S CARE?

1 A. YES.

2 Q. HOW DID THAT COME ABOUT?

3 A. THAT CAME ABOUT ON JUNE 7TH. I HAD A
4 CONVERSATION WITH THE CUA CASE MANAGEMENT TEAM. I SPOKE
5 TO THE CUA CASE MANAGER, THE CUA SUPERVISOR, THE CUA
6 CASE DIRECTOR TO GET A BETTER UNDERSTANDING AS TO THE
7 PERMANENCY FOR DOE FOSTER CHILD NUMBER 1 AND THE FOSTER
8 PARENT'S WILLINGNESS NOW TO ADOPT DOE FOSTER CHILD
9 NUMBER 1.

10 AFTER I SPOKE TO THE CUA CASE MANAGEMENT
11 TEAM LATER ON IN THE AFTERNOON, I HAD A CONVERSATION
12 WITH DOE FOSTER PARENT NUMBER 1, AS WELL AS COUNSEL FOR
13 DOE FOSTER PARENT NUMBER 1, MRS. BARCLAY, TO GET A SENSE
14 OF HER COMMITMENT IN REFERENCE TO THE PERMANENCY AND
15 ADOPTION OF DOE FOSTER CHILD NUMBER 1.

16 Q. OKAY.

17 A. AFTER HEARING BOTH SIDES, I FELT THAT IT WAS IN
18 THE BEST INTEREST TO PLACE DOE FOSTER CHILD NUMBER 1
19 BACK INTO THE HOME OF DOE FOSTER MOTHER NUMBER 1.
20 HOWEVER, I EXPLAINED TO BOTH THE CUA CASE MANAGEMENT
21 TEAM, AS WELL AS DOE FOSTER PARENT NUMBER 1, THAT WE
22 NEEDED TO GET JUDICIAL APPROVAL BECAUSE THIS WAS NOT AN
23 EMERGENCY MOVE, THEREFORE, THE COURT WOULD HAVE TO
24 APPROVE THE MOVE.

25 Q. AND TO YOUR KNOWLEDGE, DID THE COURT ULTIMATELY

1 SIGN AN ORDER AUTHORIZING THE CHILD TO RETURN TO DOE
2 FOSTER MOTHER NUMBER 1'S CARE?

3 A. YES.

4 Q. DO YOU RECALL WHAT DATE THAT OCCURRED?

5 A. JUNE 12TH.

6 Q. 2018?

7 A. YES.

8 Q. AND THAT WAS THE DATE THAT THE COURT SIGNED THE
9 ORDER?

10 A. YES.

11 Q. AND THE CHILD RETURNED TO HER CARE ON THAT DATE?

12 A. YES.

13 Q. OKAY. AND JUST BRIEFLY, ONE OTHER THING. IN
14 HIS TEXT MESSAGE, MR. BLACK INDICATED THAT -- AND AGAIN,
15 I QUOTE: "BUT DHS SUPPOSEDLY JUST TOLD THE CASE MANAGER
16 THE CHILD COULD NOT GO BACK TO OUR HOME."

17 DID YOU HAVE AN OPPORTUNITY TO VERIFY
18 THAT? DID YOU HAVE ANY CONVERSATION WITH THE CATHOLIC
19 CUA CASE MANAGER?

20 A. YES, I TALKED TO THE CATHOLIC CUA CASE MANAGER,
21 MR. WHITMAN, ABOUT --

22 MS. BARCLAY: OBJECTION AS TO HEARSAY.

23 THE COURT: OVERRULED.

24 THE WITNESS: -- ABOUT WHAT HAPPENED THE
25 EVENING OF MAY 25TH. NUMBER ONE, WHO DID HE SPEAK TO AT

1 DHS? HE INDICATED THAT HE COULD NOT REMEMBER, HOWEVER, IT
2 WAS A FEMALE THAT HE SPOKE TO. I ASKED HIM THE CONVERSATION
3 THAT HE HAD, AND HE INDICATED TO ME THAT THE DHS STAFF
4 PERSON TOLD HIM THAT SHE WOULD HAVE TO GET APPROVAL IN ORDER
5 TO PLACE DOE FOSTER CHILD NUMBER 1 BACK INTO THE HOME OF DOE
6 FOSTER CHILD NUMBER 2.

7 HE INDICATED THAT HE COMMUNICATED THAT
8 INFORMATION TO DOE FOSTER PARENT NUMBER 1, THAT APPROVAL
9 NEEDED TO OCCUR BEFORE THE FOSTER CHILD COULD BE PLACED BACK
10 IN HER HOME.

11 MS. OLIVER: THANK YOU, MS. ALI.

12 YOUR HONOR, I HAVE NO FURTHER QUESTIONS.

13 THE COURT: ANY CROSS-EXAMINATION?

14 MS. BARCLAY: YES, YOUR HONOR, VERY BRIEFLY.

15 CROSS-EXAMINATION

16 BY MS. BARCLAY:

17 Q. GOOD AFTERNOON, MS. ALI.

18 A. GOOD AFTERNOON.

19 Q. ON MAY 25TH, DID ANYONE FROM DHS COMMUNICATE TO
20 YOU THE NEED FOR THAT APPROVAL THAT YOU DISCUSSED ON
21 YOUR DIRECT EXAMINATION?

22 A. NO.

23 Q. NOW, WHEN DID -- THE ADDITIONAL ISSUES ABOUT DOE
24 FOSTER PARENT NUMBER 1 AND DOE FOSTER CHILD NUMBER 1,
25 WHEN WERE THOSE COMMUNICATED TO YOUR ATTORNEYS?

1 A. I'M NOT SURE. I WAS ACTUALLY ON VACATION OR
2 RETURNING BACK FROM VACATION ON JUNE THE 5TH.

3 MS. BARCLAY: YOUR HONOR, MAY I HAVE
4 PERMISSION TO APPROACH THE WITNESS?

5 THE COURT: YES.

6 MS. BARCLAY: THIS IS 3E OF THE DEFENDANT'S
7 FILING.

8 BY MS. BARCLAY:

9 Q. CAN YOU TURN WITH ME TO THE BACK OF THIS
10 DOCUMENT, THE VERY FIRST E-MAIL ON THE CHAIN, PAGE 7.

11 HAVE YOU EVER SEEN THIS E-MAIL FROM
12 MS. WINDHAM TO MR. BENJAMIN FIELD?

13 A. YES.

14 Q. WHAT IS THE DATE OF THIS E-MAIL?

15 A. FRIDAY, JUNE 1ST, 2018, AT 9:14 P.M.

16 Q. AND THIS IS THE E-MAIL THAT I WILL FIRST BE
17 BRINGING TO YOUR ATTENTION, TO DHS'S ATTENTION SOME OF
18 THESE ADDITIONAL FACTS ABOUT DOE FOSTER PARENT NUMBER 1
19 AND DOE FOSTER CHILD NUMBER 1, CORRECT?

20 MS. OLIVER: OBJECTION, YOUR HONOR, IN THAT
21 THIS DOCUMENT WAS SENT TO MR. FIELD FROM MS. WINDHAM.

22 BY MS. BARCLAY:

23 Q. MS. ALI, DID YOU -- YOU SAID YOU WERE FAMILIAR
24 WITH THIS E-MAIL.

25 IS THIS E-MAIL THE WAY THAT YOU LEARNED

1 ABOUT ADDITIONAL FACTS FROM DOE FOSTER CHILD NUMBER 1
2 AND DOE FOSTER MOTHER NUMBER 1?

3 A. NO. I LEARNED ABOUT THE ADDITIONAL FACTS BY WAY
4 OF OUR CONVERSATION WITH FIRST DEPUTY COMMISSIONER
5 SHAPIRO ON JUNE THE 5TH.

6 Q. OKAY. WAS SHE RELAYING HER UNDERSTANDING ABOUT
7 THAT CORRESPONDENCE ON JUNE THE 5TH, IS THAT YOUR
8 TESTIMONY?

9 MS. OLIVER: OBJECTION. CALLS FOR
10 SPECULATION.

11 THE COURT: I DON'T KNOW HOW SHE CAN ANSWER
12 THAT. SUSTAINED.
13 BY MS. BARCLAY:

14 Q. DO YOU KNOW WHAT THE BASIS WAS FOR DEPUTY
15 COMMISSIONER SHAPIRO'S INFORMATION ABOUT DOE FOSTER
16 MOTHER NUMBER 1?

17 A. I DON'T KNOW THE BASIS.

18 Q. YOU DON'T KNOW THE BASIS FOR HER?

19 A. NO.

20 Q. WHEN YOU SPOKE WITH MR. BLACK ON MAY 25TH, YOU
21 KNEW THAT HE WAS -- HE DID NOT KNOW THE SPECIFICS OF THE
22 CASE, RIGHT?

23 A. HE KNEW SOME SPECIFICS OF THE CASE IN THAT HIS
24 TEXT SAID THAT HE WAS MOVED EARLIER THIS MONTH FROM ONE
25 OF CSS'S FOSTER HOMES TO A PREADOPTIVE HOME FROM ANOTHER

1 AGENCY; THAT THE PLACEMENT HAS NOT WORKED OUT; THAT CUA
2 4 CONTACTED OUR FOSTER MOTHER WHO WOULD TAKE THE CHILD
3 BACK. SO HE KNEW SOME INFORMATION.

4 MS. BARCLAY: YOUR HONOR, PERMISSION TO
5 APPROACH THE WITNESS.

6 THE COURT: YES.

7 MS. BARCLAY: AND THIS IS HER DECLARATION.
8 BY MS. BARCLAY:

9 Q. MS. ALI, I AM READING FROM YOUR DECLARATION, IF
10 YOU TURN TO PAGE 11.

11 ON PARAGRAPH 52, THIS BEGINS YOUR
12 CONVERSATION THAT BEGAN FRIDAY, MAY 25TH AT 10:16 P.M.,
13 CORRECT?

14 A. YES.

15 Q. AND ON PARAGRAPH 55, YOU SAID: "I SUBSEQUENTLY
16 CALLED HIM TO DISCUSS WHETHER IT WAS AN EMERGENCY, AND
17 HE DID NOT KNOW THE SPECIFICS OF THE CASE."

18 DID I READ THAT CORRECTLY?

19 A. YES.

20 Q. MS. ALI, YOU ALSO HAD DETERMINED THAT IT WAS IN
21 THE BEST INTEREST OF DOE FOSTER CHILD NUMBER 1 TO BE
22 PLACED WITH DOE FOSTER MOTHER NUMBER 1, CORRECT?

23 A. YES.

24 Q. AND THE JUDGE MADE THAT DETERMINATION AS WELL?

25 A. YES.

1 Q. AND IF IT WEREN'T FOR THE REFERRAL STOPPAGE THAT
2 YOU PLACED, HE WOULDN'T HAVE BEEN PLACED WITH DOE FOSTER
3 MOTHER NUMBER 1 ON THE EVENING OF THE 25TH, CORRECT?

4 MS. OLIVER: OBJECTION. CALLS FOR
5 SPECULATION.

6 THE COURT: OVERRULED.

7 YOU CAN ANSWER.

8 THE WITNESS: NO.

9 BY MS. BARCLAY:

10 Q. HE WOULD NOT HAVE BEEN PLACED WITH THE PLACEMENT
11 IN HIS BEST INTEREST WHERE THERE IS AN EMERGENCY
12 SITUATION?

13 A. ON MAY THE 25TH WHEN I SPOKE TO JIM, HE COULD
14 NOT ANSWER WHETHER OR NOT IT WAS AN EMERGENCY MOVE OR
15 NOT.

16 Q. I'M TALKING ABOUT BEFORE YOU SPOKE TO JIM,
17 BECAUSE YOU WOULD NOT HAVE NEEDED TO GET INVOLVED OR
18 SPEAK TO JIM AT ALL IF THE PLACEMENT HAD NOT ALREADY
19 BEEN DENIED AT THAT POINT, CORRECT?

20 MS. OLIVER: OBJECTION, YOUR HONOR. THE
21 QUESTION CALLS FOR SPECULATION.

22 MS. BARCLAY: IT DOES NOT CALL FOR
23 SPECULATION, YOUR HONOR. THOSE ARE FACTS THAT ARE ALREADY
24 IN EVIDENCE.

25 THE COURT: CAN YOU ANSWER THE QUESTION?

1 THE WITNESS: CAN YOU REPEAT IT.

2 BY MS. BARCLAY:

3 Q. BY THE TIME YOU SPOKE TO MR. BLACK, THE -- HE
4 WAS COMMUNICATING WITH YOU BECAUSE THE PLACEMENT BY THE
5 CUA WORKER HAD ALREADY BEEN DENIED, CORRECT?

6 A. MR. BLACK'S TEXT SAYS, "DHS SUPPOSEDLY."

7 Q. AND SO IF DHS HAD NOT DENIED THE PLACEMENT AND
8 SAID THAT, QUOTE: "THE CASE MANAGER" -- "JUST TOLD THE
9 CASE MANAGER THE CHILD COULD NOT GO BACK TO OUR HOME,"
10 IF THAT HAD NOT HAVE HAPPENED, JAMES BLACK WOULD NOT
11 HAVE BEEN TEXTING YOU AT ALL THAT EVENING, WOULD HE?

12 MS. OLIVER: YOUR HONOR, OBJECTION, BASED ON
13 SPECULATION.

14 THE COURT: SUSTAINED.

15 BY MS. BARCLAY:

16 Q. MR. BLACK WAS TEXTING YOU BECAUSE A DENIAL HAD
17 HAPPENED ACCORDING TO HIS TEXT MESSAGE TO YOU, CORRECT?

18 MS. OLIVER: OBJECTION.

19 THE COURT: OVERRULED.

20 THE WITNESS: REPEAT IT AGAIN, I'M SORRY.

21 BY MS. BARCLAY:

22 Q. MR. BLACK WAS TEXTING YOU THAT EVENING BECAUSE
23 DHS HAD DENIED THE CHILD BEING SENT BACK TO THE CATHOLIC
24 SOCIAL SERVICES HOME, CORRECT?

25 MS. OLIVER: OBJECTION. THAT'S A

1 MISCHARACTERIZATION. THE TEXT SAYS "SUPPOSEDLY."

2 THE COURT: WELL, IF SHE KNOWS.

3 THE WITNESS: HE SAID, "DHS SUPPOSEDLY," SO I
4 WENT BY THE BASIS OF HIS TEXT.

5 BY MS. BARCLAY:

6 Q. AND SO HE IS ONLY TEXTING YOU BECAUSE HE IS
7 SAYING, QUOTE: "DHS JUST TOLD THE CASE MANAGER THE
8 CHILD COULD NOT GO BACK TO OUR HOME."

9 DID I READ THAT CORRECTLY?

10 A. YES, YOU DID.

11 Q. AND SO IF THAT WAS TRUE AND IF THERE WAS NOT
12 THAT DENIAL, MR. BLACK WOULD NOT HAVE NEEDED TO TEXT YOU
13 ABOUT THAT SITUATION THAT EVENING, WOULD HE?

14 A. TRUE.

15 MS. BARCLAY: NO FURTHER QUESTIONS, YOUR
16 HONOR.

17 THE COURT: ANY OTHER QUESTIONS?

18 MS. OLIVER: NO, YOUR HONOR.

19 THE COURT: OKAY. THANK YOU.

20 MS. CORTES: YOUR HONOR, CAN WE SEE YOU
21 BRIEFLY AT SIDEBAR?

22 THE COURT: OKAY.

23 (SIDEBAR OCCURRED.)

24 MS. CORTES: YOUR HONOR, WE HAVE TWO MORE
25 WITNESSES. I UNDERSTAND FROM YOUR LAW CLERK THAT HE SAID

1 THAT YOU WOULD BE WILLING TO GO UNTIL 5:30. HOWEVER, GIVEN
2 THAT THERE ARE TWO WITNESSES AND I DON'T THINK THAT EITHER
3 OF THEM WILL BE ABLE TO FINISH.

4 MR. FIELD: IF NEXT WITNESS WOULD BE
5 COMMISSIONER FIGUEROA, WE WOULD DO OUR BEST TO BE FOCUSED,
6 BUT IT'S A SUBSTANTIAL AMOUNT OF TESTIMONY.

7 THE COURT: WELL, YOU CAN DO THE DIRECT.
8 THAT WOULD BE GOOD TO GET IT STARTED.

9 MS. BARCLAY: YOUR HONOR, MS. WINDHAM HAS A
10 PLANE TICKET PURCHASED TO LEAVE TOMORROW MORNING AND WE JUST
11 ARE NOT IN A POSITION FOR THIS TO CONTINUE AGAIN UNTIL
12 TOMORROW.

13 THE COURT: WELL, I DON'T KNOW HOW LONG YOU
14 WANT ME TO STAY, BUT...

15 MS. CORTES: THERE IS NO WAY FOR US TO
16 FINISH.

17 MS. BARCLAY: CAN WE DISCUSS IT?

18 MR. RIENZI: YOUR HONOR, IF WE CONTINUE
19 TOMORROW, WHAT TIME TOMORROW?

20 THE COURT: IN THE MORNING.

21 THE LAW CLERK: ACTUALLY, JUDGE, YOU ARE
22 BOOKED UP FULLY TOMORROW.

23 THE COURT: SO IT WOULD BE THURSDAY.

24 MS. WINDHAM: AND I APOLOGIZE, YOUR HONOR,
25 THIS IS A TRIP THAT I BOOKED BEFORE THIS CASE EVEN AROSE. I

1 DID NOT REALIZE THIS CASE MIGHT BLEED INTO A THIRD DAY.

2 THE COURT: OKAY. WELL, LET'S GET STARTED.

3 MR. FIELD: THANK YOU, YOUR HONOR.

4 (SIDEBAR CONCLUDED.)

5 THE COURT: OKAY. WELL, LET'S GET STARTED.

6 MR. FIELD: THANK YOU, YOUR HONOR.

7 THE COURT: CITY, CALL YOUR NEXT WITNESS.

8 MR. FIELD: THE CITY CALLS CYNTHIA FIGUEROA
9 TO THE STAND.

10 (WITNESS SWORN.)

11 THE WITNESS: CYNTHIA FIGUEROA, FIRST NAME IS
12 C-Y-N-T-H-I-A. LAST NAME FIGUEROA, F-I-G-U-E-R-O-A.

13 MR. FIELD: YOUR HONOR, MAY WE CLEAN UP THE
14 EXHIBITS THAT ARE FROM PRIOR WITNESSES?

15 THE COURT: YES.

16 DIRECT EXAMINATION

17 BY MR. FIELD:

18 Q. COMMISSIONER FIGUEROA, THANK YOU FOR BEING HERE
19 TODAY.

20 CAN YOU JUST STATE YOUR CURRENT POSITION
21 WITH THE CITY?

22 A. I AM THE COMMISSIONER OF THE DEPARTMENT OF HUMAN
23 SERVICES FOR PHILADELPHIA.

24 Q. THANK YOU.

25 AND BEFORE WE GET INTO THE MEAT OF THIS

1 CASE, I WANT TO START BY HAVING YOU TELL US A LITTLE BIT
2 ABOUT YOUR EDUCATIONAL AND PROFESSIONAL BACKGROUND AND
3 HOW YOU CAME TO THE POSITION YOU ARE CURRENTLY IN.

4 WHERE DID YOU GO TO COLLEGE?

5 A. I WENT TO SPRING HILL COLLEGE. IT'S THE THIRD
6 OLDEST JESUIT INSTITUTION IN THE NATION.

7 Q. AND WHEN DID YOU GRADUATE FROM SPRING HILL?

8 A. I GRADUATED IN 1995.

9 Q. WHERE WAS SPRING HILL?

10 A. IT'S IN MOBILE, ALABAMA.

11 Q. WHAT DID YOU DO TO START YOUR CAREER AFTER
12 GRADUATION?

13 A. CERTAINLY. SO I WAS JUST BY THE NATURE OF MY
14 FAMILY HISTORY, WE ARE FIRST GENERATION -- FIRST
15 GENERATION IMMIGRANTS. SOCIAL JUSTICE WAS A BIG CALL,
16 AND A HUGE REASON WHY MY PARENTS WERE VERY INTERESTED IN
17 MAKING SURE THAT I PURSUED AN EDUCATION, AND REALLY
18 LOOKED VERY FONDLY ON THE JESUIT EDUCATION.

19 SO THROUGH COLLEGE I DID THE JESUIT
20 VOLUNTEER CORP, WHERE I WORKED IN DETROIT, MICHIGAN, IN
21 A DOMESTIC VIOLENCE SHELTER, AND I ALSO WORKED WITH
22 WOMEN WHO WERE INCARCERATED, WHO WERE UP FOR PAROLE.

23 Q. AND WHERE DID YOU GO AFTER THAT POSITION?

24 A. SO I THEN MOVED TO PHILADELPHIA, AND I HAVE HAD
25 OVER A 20-YEAR CAREER WORKING IN SOCIAL SERVICES WITH

1 WOMEN AND CHILDREN, MOSTLY SUPPORTING THE NEEDS AND
2 RIGHTS OF CHILDREN AND FAMILIES.

3 Q. BRIEFLY -- AND WE DON'T NEED TO SPEND A LOT OF
4 TIME -- WHAT ARE SOME OF THE ORGANIZATIONS YOU'VE WORKED
5 WITH AND POSITIONS YOU'VE HELD?

6 A. SURE. SO MY FIRST JOB IN PHILADELPHIA WAS
7 CONGRESSO DE LATINOS UNIDAS. I THEN WORKED AT WOMEN
8 AGAINST ABUSE. I HAD THE HONOR OF SERVING IN THE
9 MAYOR NUTTER'S ADMINISTRATION AS THE DEPUTY COMMISSIONER
10 OF THE DEPARTMENT OF HUMAN SERVICES. I WAS THERE FOR A
11 TIME BEFORE I BECAME THE CEO OF CONGRESSO DE LATINOS
12 UNIDAS, AND THEN SUBSEQUENTLY, MOST RECENTLY, WAS
13 APPOINTED TO SERVE AS COMMISSIONER OF THE DEPARTMENT OF
14 HUMAN SERVICES.

15 Q. AND WERE SOME OF THOSE JOBS, SHALL WE SAY,
16 HANDS-ON WITH THE COMMUNITIES, AND SOME OF THOSE JOBS
17 SUPERVISORY?

18 A. YES. SO CERTAINLY THE EARLIER PART OF MY CAREER
19 WAS DIRECT CASE MANAGEMENT WORK WITH INDIVIDUALS. EARLY
20 ON WHEN I MOVED TO PHILADELPHIA, I RECOGNIZED THE
21 CAPACITY AND ABILITY TO HANDLE AND DO MORE
22 ADMINISTRATIVE AND LEADERSHIP WORK, BUT A HUGE PORTION
23 OF MY WORK, BOTH AT WOMEN AGAINST ABUSE AND CONGRESSO,
24 WAS DIRECTLY CONNECTED TO WORK IN THE COMMUNITY AND WITH
25 DIRECT CLIENTS.

1 MY OFFICE WHEN I -- THE MAJORITY OF THE
2 TIME THAT I RAN WOMEN AGAINST ABUSE WAS ACTUALLY IN THE
3 PHYSICAL SHELTER WHERE THE WOMEN AND CHILDREN RESIDED,
4 SO I WAS IN DAILY CONTACT WITH THE WOMEN AND CHILDREN
5 THAT WE SERVED. AT CONGRESSO, A COMMUNITY THAT I SERVED
6 FOR A NUMBER OF YEARS, MY OFFICE WAS LOCATED IN NORTH
7 PHILADELPHIA. I WENT TO COMMUNITY MEETINGS. I
8 PARTICIPATED IN COMMUNITY EVENTS. I FREQUENTED THE
9 BUSINESSES IN NORTH PHILADELPHIA, AND WORKED VERY
10 CLOSELY WITH THE COMMUNITY.

11 Q. AND YOU MENTIONED HAVING WORKED FOR DHS DURING
12 THE NUTTER ADMINISTRATION?

13 A. THAT'S CORRECT.

14 Q. WHEN DID YOU WORK THERE AND WHAT POSITION DID
15 YOU HAVE?

16 A. SO FROM 2008 TO 2011, I WAS A DEPUTY
17 COMMISSIONER OF PREVENTION.

18 Q. AND WHAT WERE YOUR RESPONSIBILITIES IN THAT
19 POSITION?

20 A. SO MY RESPONSIBILITIES WERE TO OVERSEE ALL OF
21 THE PREVENTION SERVICES THAT WERE FOR FAMILIES AND
22 CHILDREN WHO WERE NOT FORMALLY ENGAGED IN THE CHILD
23 WELFARE SYSTEM, SO TRUANCY, DOMESTIC VIOLENCE, AFTER
24 SCHOOL SERVICES, HOUSING SERVICES, AND IN-HOME CASE
25 MANAGEMENT WHERE THERE WASN'T AN ACCEPTOR FOR SERVICES

1 CASE.

2 Q. THANK YOU.

3 SO I WOULD LIKE TO SHIFT AND TALK ABOUT
4 YOUR TIME AT DHS CURRENTLY AND DHS'S AND YOUR -- DHS'S
5 RESPONSIBILITIES AND YOUR RESPONSIBILITIES AS
6 COMMISSIONER.

7 WHEN DID YOU BECOME COMMISSIONER AT DHS?

8 A. I WAS APPOINTED IN JULY OF 2017.

9 Q. WAS THAT APPOINTMENT EFFECTIVE IN JULY, OR DID
10 YOUR TENURE START --

11 A. MY TENURE STARTED IN SEPTEMBER OF 2016.

12 Q. IF YOU COULD, AS COMMISSIONER, WHAT DOES DHS DO?
13 WHAT IS ITS MANDATE? WHAT ARE ITS SET OF
14 RESPONSIBILITIES?

15 A. WELL, IT'S A HUGE JOB WHERE I HAVE HAD A NUMBER
16 OF COUNSELED MEMBERS AND OTHER INDIVIDUALS REMIND ME
17 IT'S PROBABLY THE HARDEST JOB IN THE CITY OF
18 PHILADELPHIA. BUT ON A DAILY BASIS, I AM RESPONSIBLE
19 FOR 1,500 EMPLOYEES, A BUDGET OF WELL OVER 600 MILLION,
20 AND I AM CHARGED AS THE COUNTY ADMINISTRATOR TO OVERSEE
21 THE RESPONSIBILITY OF THE CHILD WELFARE INSTITUTION, SO
22 THE RESPONSIBILITY IS ENSURING THAT WE MEET THE STATE
23 MANDATES, AS WELL AS FEDERAL MANDATES RELATED TO CHILD
24 WELFARE.

25 Q. AND SO HOW ARE THOSE CHILD WELFARE ACTIVITIES

1 ORGANIZED WITHIN DHS? WHAT DO THEY CONSIST OF, AND HOW
2 DOES DHS MANAGE THEM?

3 A. WE HAVE MULTIPLE DIVISIONS, BECAUSE IT IS A VERY
4 LARGE PIECE OF WORK, SO I HAVE DEPUTIES THAT LEAD
5 VARIOUS DIVISIONS IN THE DEPARTMENT. YOU HEARD EARLIER
6 FROM DEPUTY COMMISSIONER ALI. SHE OVERSEES WHAT IS
7 CALLED CHILD WELFARE OPERATIONS, AND THAT'S EVERYTHING
8 FROM THE VERY FRONT END OF OUR SERVICE, FROM THE
9 HOTLINE, INTAKE, AND INVESTIGATION TO THE WORK OF THE
10 UMBRELLA AGENCIES, AS WELL AS THE INVESTIGATION PIECE
11 THAT I MENTIONED, ALL THE WAY THROUGH ADOPTION AND
12 PERMANENCY.

13 WE ALSO HAVE OTHER DIVISIONS, INCLUDING
14 PREVENTION. WE HAVE A PERFORMANCE MANAGEMENT AND
15 TECHNOLOGY. WE HAVE A FINANCE AND CONTRACT DIVISION.
16 WE HAVE JUVENILE JUSTICE, AND ADMINISTRATION AND
17 MANAGEMENT.

18 Q. SO THE FOSTER-CARE SERVICES AND FOSTER-CARE
19 CHILDREN THAT ARE AT ISSUE IN THE LITIGATION, WHAT
20 DIVISION DO THOSE FALL UNDER?

21 A. CHILD WELFARE OPERATIONS.

22 Q. DOES THAT INCLUDE FOSTER-CARE CHILDREN WHO ARE
23 SINGLE FAMILY PLACEMENTS AND OTHER CHILDREN IN THE
24 CITY'S CUSTODY AS WELL?

25 A. YES.

1 Q. CAN YOU EXPLAIN THE FULL MONOPOLY OF CHILDREN
2 YOU HAVE A RESPONSIBILITY THERE FOR, PLEASE?

3 A. SURE. WHEN WE REFER TO A CHILD BEING IN
4 PLACEMENT, THAT PLACEMENT COULD BE A FOSTER-CARE HOME, A
5 RESOURCE HOME THAT IS KIN, AS WELL AS CONGREGATE, SO THE
6 RESIDENTIAL PLACEMENT.

7 Q. AND SO HOW MANY CHILDREN OVERALL -- AND I
8 APOLOGIZE IF YOU SAID IT, I AM NOT SURE -- ARE IN
9 FOSTER-CARE IN THE CITY'S CUSTODY?

10 A. SO CURRENTLY, THERE ARE 6,000 KIDS IN PLACEMENT,
11 AND THERE ARE ABOUT ANOTHER ADDITIONAL 4,000 WHO RECEIVE
12 IN-HOME CASE MANAGEMENT SERVICES WHO ARE CONSIDERED
13 PLACEMENT. SO ON ANY GIVEN DAY, WE HAVE A
14 RESPONSIBILITY OF OVER 10,000 KIDS IN OUR SYSTEM, AND
15 THAT'S NOT INCLUDING THE JUVENILE JUSTICE PART OF THE
16 WORD.

17 Q. UNDERSTOOD. THANK YOU.

18 ARE SOME OF THE KIDS PLACED WITH
19 RELATIVES AND SOME OF THOSE KIDS PLACED WITH FOSTER-CARE
20 FAMILIES THEY DON'T PREVIOUSLY HAVE RELATIONSHIPS WITH?

21 A. YES. SO ONE OF THE THINGS THAT WE HAVE BEEN
22 VERY COMMITTED TO IS FAMILIES FIRST, AND KINSHIP FIRST
23 IS THE NUMBER-ONE PRIORITY, AND THAT'S A WELL-UNDERSTOOD
24 CULTURE NORM IN THE DEPARTMENT. SO I AM HAPPY TO REPORT
25 IN TERMS OF THE PLACEMENT SERVICES THAT ARE HOME-BASED,

1 SO IF YOU REMOVE THE RESIDENTIAL, OVER 50 PERCENT OF OUR
2 KIDS ARE WITH KIN.

3 Q. AND ARE YOU ABLE GENERALLY TO GIVE NUMBERS FOR
4 HOW THE REMAINING 50 PERCENT OF THE CHILDREN ARE PLACED?

5 A. THEY ARE PLACED IN GENERAL FOSTER-CARE. I DON'T
6 HAVE THE BREAKDOWN OF SPECIALIZED.

7 Q. AND YOU HEARD MS. ALI'S TESTIMONY YESTERDAY
8 REGARDING THE STRUCTURE OF COMMUNITY UMBRELLA AGENCY AND
9 FOSTER-CARE AGENCIES?

10 A. YES.

11 Q. TO YOUR UNDERSTANDING, WAS THAT GENERALLY
12 ACCURATE?

13 A. YES, THAT WAS ACCURATE.

14 Q. SO CSS FOSTER-CARE AGENCY IS ONE OF HOW MANY
15 FOSTER-CARE AGENCIES IN THE CITY?

16 A. 30.

17 Q. APPROXIMATELY HOW MANY CHILDREN, TO YOUR
18 KNOWLEDGE, DO THEY TAKE CARE OF?

19 A. IN CSS FOSTER-CARE?

20 Q. CORRECT?

21 A. I BELIEVE AS OF THIS MONTH IT'S AROUND 107.

22 Q. SO LET'S SHIFT FOR A MOMENT -- ACTUALLY, LET'S
23 JUST COME BACK. WE WERE TALKING ABOUT THE CHILDREN WHO
24 ARE IN THE CITY'S CUSTODY.

25 WHEN THEY -- HOW DO THEY FIRST COME INTO

1 THE CITY'S CUSTODY?

2 A. SO GENERALLY, THEY COME TO OUR ATTENTION THROUGH
3 THE HOTLINE, AND THERE IS SAFETY DETERMINED ABOUT
4 WHETHER OR NOT THE CHILD CAN REMAIN SAFELY AT HOME. IF
5 NOT, THEN THERE HAS TO BE AN ORDER OF PROTECTIVE CUSTODY
6 AS A RESULT OF THE INVESTIGATION. WE WOULD MAKE A
7 DETERMINATION OF THE PLACEMENT NEEDS OF THAT CHILD BASED
8 ON THE LEVEL OF CARE THAT HAS BEEN DETERMINED BY THE
9 CENTRAL REFERRAL UNIT.

10 Q. CAN YOU EXPLAIN WHAT THE CENTRAL REFERRAL UNIT
11 IS, AND WHAT IT DOES?

12 A. SO IT'S APTLY NAMED FOR ITS ROLE THAT IT PLAYS,
13 WHICH IT PLAYS A CENTRAL ROLE IN OUR DEPARTMENT TO
14 MANAGE ANY OF THE PLACEMENT DECISIONS FOR CHILDREN IN
15 THE CHILD WELFARE SYSTEM ON THE DEPENDENCY SIDE.

16 Q. SO WHEN A CHILD FIRST COMES INTO THE CITY
17 CUSTODY, THE CENTRAL REFERRAL UNIT DOES WHAT?

18 A. SO THE CENTRAL REFERRAL UNIT WOULD BE ABLE TO
19 DETERMINE THROUGH, AS MS. ALI OUTLINED, THE LEVEL OF
20 CARE TOOL THAT IS USED TO DETERMINE THE BEST AND MOST
21 ACCURATE PLACEMENT FOR THAT YOUTH, AND THEN WE WORK TO
22 DETERMINE WHAT PLACEMENT THAT CHILD WOULD THEN FALL
23 INTO.

24 Q. AND AS COMMISSIONER, WHAT IS YOUR UNDERSTANDING?
25 WHAT GUIDES THOSE DETERMINATIONS?

1 A. THERE ARE A HOST OF ISSUES. IF THE CHILD HAS
2 SPECIAL MEDICAL NEEDS, THE CHILD HAS ACUTE INTELLECTUAL
3 DISABILITY ISSUES THAT WE HAVE TO CONSIDER IN PLACEMENT,
4 IF THE CHILD HAS A SIBLING THAT IS ALREADY IN THE
5 SYSTEM, THE AGE OF THE CHILD.

6 Q. AND WE HAVE HEARD THE TERM THROUGHOUT THE PAST
7 TWO DAYS, "THE BEST INTEREST OF THE CHILD."

8 WHAT, AS COMMISSIONER, DO YOU UNDERSTAND
9 THAT TO MEAN?

10 A. TO US THE BEST INTEREST OF THE CHILD IS -- YOU
11 KNOW, IT'S A DIRECT CONNECTION TO OUR TRANSFORMATION
12 EFFORT, WHICH OUR CHILDREN ARE IN HOMES WITH KIN IN
13 THEIR COMMUNITY IN THE LEAST RESTRICTIVE ENVIRONMENTS.

14 Q. SO I WOULD LIKE TO TURN TO THE FOSTER PARENT
15 SIDE OF THINGS, OR WHAT IS SOMETIMES CALLED RESOURCE
16 PARENTS.

17 WHO ARE THEY, AND HOW DO THEY COME TO BE
18 AVAILABLE TO THE CITY TO TAKE CARE OF THE CHILDREN WHO
19 ARE IN THE CITY'S CUSTODY?

20 A. WELL, THEY ARE EVERYBODY AND ANYBODY WHO
21 EXPRESSES AND HAS A CAPACITY AND INTEREST IN SERVING AS
22 A RESOURCE FAMILY IN PHILADELPHIA.

23 Q. AND HOW DOES THE CITY BECOME AWARE OF THEM SUCH
24 THAT THEY CAN OFFER CHILDREN THROUGH THE CENTRAL
25 REFERRAL UNIT PLACEMENTS?

1 A. THERE IS AN -- ON THE CITY SIDE, WE HAVE
2 ACTIVELY BEEN INVOLVED IN RECRUITMENT AND ENGAGEMENT
3 EFFORTS WITH THE COMMUNITY, SO THAT WE CAN EXPAND THE
4 NUMBER OF FAMILIES. A NUMBER OF FOSTER-CARE AGENCIES
5 HIRE AND HAVE THEIR OWN RECRUITMENT STAFF WHO ACTUALLY
6 WORK TO IDENTIFY THEIR OWN FAMILIES AS WELL.

7 Q. IS RECRUITING OR -- AND CERTIFYING FOSTER-CARE
8 PARENTS A RESPONSIBILITY OF ALL OF THE FOSTER-CARE
9 AGENCIES THAT CONTRACT WITH THE CITY?

10 A. IT IS.

11 Q. SO YOU MENTIONED THE CITY'S RECRUITMENT EFFORTS.

12 A. YES.

13 Q. WHAT ARE THOSE RECRUITMENT EFFORTS, AND WHY IS
14 THE CITY ENGAGED IN THEM?

15 A. SO WE HAVE BEEN ON A QUEST TO -- FOR A FEW
16 THINGS; ONE IS TO ENSURE THAT WE HAVE MORE KIDS IN THEIR
17 COMMUNITIES IN THE LEAST RESTRICTIVE ENVIRONMENTS, AND
18 SO WE HAVE BEEN LOOKING TO REDUCE THE CONGREGATE CARE
19 NUMBERS. AND THEN WE HAVE BEEN LOOKING TO MAKE SURE
20 THAT WE HAVE ALL AND AS MANY OPTIONS FOR OUR CHILDREN IN
21 THE SYSTEM.

22 SO WE BELIEVE THE BEST WAY TO DO THAT IS
23 TO ENSURE WE CAN HAVE MORE HOMES AVAILABLE, AS WELL AS
24 MAKE SURE THAT WE WERE IDENTIFYING THE FACT THAT WE HAD
25 A LARGE NUMBER OF OLDER YOUTH THAT IDENTIFIED AS LGBTQ,

1 AND WE WANTED TO ENSURE THAT WE HAD HOMES THAT WERE
2 AFFIRMING TO THAT YOUTH, TO THAT GROUP.

3 Q. IS THAT GROUP MORE DIFFICULT TO FIND PLACEMENTS
4 FOR THAN SOME OTHER GROUPS, IN YOUR EXPERIENCE?

5 A. IT HAS, YES.

6 Q. WHY DO YOU UNDERSTAND THAT TO BE?

7 A. SO THAT THE CHILD KNOWS GOING INTO THAT HOME
8 THAT THERE ^AREN'T ANY ISSUES OR CHALLENGES IN REGARD TO
9 THEIR OWN SEXUAL IDENTITY OR IDENTIFICATION, AND THAT
10 THEY CAN BEHAVE FREELY AND BE WHO THEY ARE AS AN
11 INDIVIDUAL IN THAT HOME WITH THOSE RESOURCE PARENTS.

12 Q. AND WHAT IS THE RESULT OF THE CITY'S RECENT
13 RECRUITMENT EFFORTS?

14 A. WE HAVE BEEN HIGHLY SUCCESSFUL. WE ARE
15 THRILLED. WE HAVE IDENTIFIED AND CERTIFIED 75 HOMES
16 SINCE THAT RECRUITMENT EFFORT, AND WE HAVE ALSO REALLY
17 EXPANDED THE NETWORK OF INDIVIDUALS WHO HAVE STEPPED
18 FORWARD TO EXPRESS AN INTEREST IN BECOMING A RESOURCE
19 PARENT.

20 Q. AND YOU MENTIONED THAT THERE ARE CHILDREN ALSO
21 IN CONGREGATE CARE?

22 A. YES.

23 Q. WHAT IS CONGREGATE CARE?

24 A. CONGREGATE CARE IS A RESIDENTIAL PLACEMENT THAT
25 I MIGHT REFER TO AS A SHELTER, A GROUP HOME, OR AN

1 INSTITUTION.

2 Q. AND IS IT -- COULD ALL OF THOSE CHILDREN BE
3 PLACED WITH FAMILIES, OR ARE THERE CHILDREN --

4 A. NO.

5 Q. -- WHO ARE NOT APPROPRIATE TO PLACE WITH
6 FAMILIES?

7 A. THERE ARE A NUMBER OF CHILDREN THAT ARE IN A
8 RESIDENTIAL SETTING FOR A NUMBER OF FACTORS THAT WOULD
9 NOT HAVE THEM BE AN APPROPRIATE PLACEMENT IN
10 FOSTER-CARE.

11 Q. OUTSIDE OF THOSE CIRCUMSTANCES, ARE THERE
12 OCCASIONS WHERE A CHILD CAN BE IMMEDIATELY PLACED WITH A
13 FOSTER FAMILY?

14 A. YES, THAT'S CORRECT. THERE'S A HOST OF REASONS,
15 WHETHER IT'S THE YOUNG CHILD'S HISTORY; IF THERE IS
16 ACUTE, AS I SAID BEFORE, BEHAVIORAL HEALTH ISSUE; IF
17 THERE ARE -- UNFORTUNATELY, THERE'S OFTENTIMES SEXUAL,
18 ACTING-OUT BEHAVIOR, AND THE CHILD HAS TO BE PLACED
19 COMPLETELY ALONE, SO IF THERE IS ANOTHER SIBLING OR
20 ANOTHER CHILD IN THE HOME, WE CANNOT PLACE THAT CHILD
21 RIGHT AWAY.

22 IT IS AN INCREDIBLY COMPLEX SYSTEM. THE
23 RESPONSIBILITY OF MANAGING OVER 6,000 KIDS, AND THE
24 NUMBER OF HOTLINE CALLS AND REFERRALS AND INVESTIGATIONS
25 THAT HAPPEN. WE ARE ALWAYS TRYING TO ENSURE THAT WE ARE

1 MAKING THE BEST DETERMINATION FOR THAT CHILD.

2 Q. IS IT DHS'S RESPONSIBILITY, TO THE BEST OF ITS
3 ABILITY, TO REVIEW ALL OF THE INFORMATION ABOUT CHILD --
4 CHILDREN BEFORE MAKING A PLACEMENT?

5 A. YES. WE DON'T LIKE TO RUSH TO MAKE A
6 DETERMINATION THAT COULD FURTHER PLACE A CHILD IN HARM'S
7 WAY.

8 Q. THANK YOU.

9 SO I WANT TO TURN TO TALK ABOUT CATHOLIC
10 SOCIAL SERVICES, THE PLAINTIFF HERE TODAY, AND MORE
11 CONCRETELY THE ISSUES IN THIS LITIGATION.

12 IN YOUR UNDERSTANDING, WHAT DOES CATHOLIC
13 SOCIAL SERVICES DO FOR DHS?

14 A. THEY HAVE TO DO A HOST OF SERVICES FOR US, BOTH
15 ON THE CHILD WELFARE, THE DELINQUENT, AND THE PREVENTION
16 SERVICES SIDE OF THAT, SO IT'S -- I AM HAPPY TO TALK
17 ABOUT ALL OF THOSE INDIVIDUALS SERVICES THAT -- ALMOST
18 EVERYTHING I HAVE HIGHLIGHTED THAT WE HAVE SOME CAPACITY
19 TO HAVE A CONTRACT WITH, WE ENGAGE IN CONTRACTS WITH
20 CATHOLIC SOCIAL SERVICES.

21 Q. AND IN TERMS OF BROAD FOSTER-CARE ACTIVITIES,
22 JUST GENERALLY, WHAT DO THOSE INCLUDE, NOT IN DETAILS?

23 A. SO THEY ARE A GENERAL FOSTER-CARE PROVIDER, AND
24 SO THEIR RESPONSIBILITIES, AS WITH ALL FOSTER-CARE
25 AGENCIES, ARE TO RECRUIT, TRAIN, AND CERTIFY FOSTER-CARE

1 HOMES AND FAMILIES.

2 Q. AND WERE YOU INVOLVED IN THE LAST YEAR'S
3 CONTRACTING PROCESS WITH CATHOLIC SOCIAL SERVICES FOR
4 THEIR FOSTER-AGENCY ACTIVITIES?

5 A. I SIGN ALL CONTRACTS FOR THE DEPARTMENT.

6 Q. AND YOU ARE FAMILIAR WITH THE CONTRACT?

7 A. I AM FAMILIAR WITH THE CONTRACT.

8 Q. DOES THAT CONTRACT, IN YOUR VIEW AS COMMISSIONER
9 ASSIGNED FOR THE CITY, INCLUDE THE RECRUITMENT AND
10 CERTIFICATION OF NEW FOSTER-CARE FAMILIES?

11 A. YES. IT CLEARLY DEFINES THAT AS SERVICES
12 RENDERED BY THE CONTRACTOR.

13 MR. RIENZI: OBJECTION, YOUR HONOR. IT CALLS
14 FOR LEGAL CONCLUSIONS.

15 THE COURT: OVERRULED.

16 BY MR. FIELD:

17 Q. AND DOES THE -- AND IN YOUR VIEW, DOES THE
18 COMPENSATION UNDER THE CONTRACT COMPENSATE CATHOLIC
19 SOCIAL SERVICES FOR THOSE ACTIVITIES?

20 A. YES.

21 MR. RIENZI: OBJECTION.

22 MS. BARCLAY: OBJECTION.

23 THE COURT: OVERRULED.

24 BY MR. FIELD:

25 Q. AND CATHOLIC SOCIAL SERVICES ALSO HAS A

1 COMMUNITY UMBRELLA AGENCY?

2 A. THEY DO.

3 Q. WHAT ROLE DO THEY PLAY?

4 A. SO ALL OF THE COMMUNITY UMBRELLA AGENCIES, AS
5 WITH CATHOLIC SOCIAL SERVICES, ARE THE CASE MANAGEMENT
6 COMPONENT OF THE CHILD WELFARE SYSTEM, SO THAT'S THE
7 REFORM EFFORT THAT WAS TALKED ABOUT YESTERDAY.

8 SO ALL OF THE COORDINATION OF SERVICES
9 WHO -- OF CHILDREN WHO ARE IN OUR CARE, WHETHER IN-HOME
10 OR PLACEMENT IN FOSTER-CARE OR A CONGREGATE-CARE
11 SETTING, THEY COORDINATE AND SUPPORT THE WORK OF THAT
12 CASE TO MOVE IT TOWARDS TIMELY PERMANENCY.

13 Q. AND ARE THEY RESPONSIBLE FOR WORKING
14 SPECIFICALLY WITH CATHOLIC SOCIAL SERVICES FOSTER-CARE
15 AGENCY, OR WITH ANY FOSTER-CARE AGENCY?

16 A. THEY ARE REQUIRED TO WORK WITH ALL FOSTER-CARE
17 PROVIDERS.

18 Q. THANK YOU.

19 SO I WOULD LIKE TO MOVE TO CSS'S -- TO
20 THE CLOSURE OF CSS'S INTAKE AND THE ISSUES THAT ARE
21 CENTRAL TO THIS LITIGATION TODAY.

22 HOW DID -- WHAT ASPECT OF THIS MATTER
23 FIRST CAME TO YOUR ATTENTION?

24 MR. RIENZI: OBJECTION, VAGUE.

25 BY MR. FIELD:

1 Q. WHAT ASPECT OF CSS'S REFERRAL POLICIES THAT ARE
2 AT ISSUE IN THIS LITIGATION FIRST CAME TO YOUR
3 ATTENTION?

4 THE COURT: OVERRULED.

5 THE WITNESS: SO WHAT SPECIFICALLY CAME TO MY
6 ATTENTION AS I GOT A CALL FROM -- WE GOT A -- DHS GOT A CALL
7 FROM THE PHILADELPHIA INQUIRER REGARDING KNOWLEDGE THAT THEY
8 HAD THAT TWO ORGANIZATIONS, CATHOLIC SOCIAL SERVICES AND
9 BETHANY CHRISTIAN SERVICES, WERE DENYING TO SERVE SAME-SEX
10 COUPLES.

11 MR. RIENZI: OBJECTION, AND MOVE TO STRIKE,
12 YOUR HONOR. IT'S HEARSAY.

13 THE COURT: OVERRULED. THIS IS NOT FOR THE
14 TRUTH OF THE MATTER.

15 BY MR. FIELD:

16 Q. AND WHAT DID YOU DO WHEN YOU LEARNED THAT?

17 A. UPON HEARING THAT, BOTH MYSELF AND FIRST DEPUTY
18 COMMISSIONER JESSICA SHAPIRO ACTUALLY CALLED A NUMBER OF
19 OUR FAITH-BASED INSTITUTIONS, AND WE STATED BY CALLING
20 BETHANY CHRISTIAN SERVICES, AS WELL AS CATHOLIC SOCIAL
21 SERVICES, TO ASK THEM THEIR POSITION REGARDING SERVING
22 SAME-SEX COUPLES AND SERVING THEIR HOMES.

23 Q. WHAT DID YOU LEARN FROM THE PHONE CALLS?

24 MR. RIENZI: OBJECTION, HEARSAY.

25 THE COURT: OVERRULED.

1 THE WITNESS: I WAS ON THE PHONE WITH JESSICA
2 AND JAMES AMATO AND HE INDICATED THAT THEY WOULD NOT, BASED
3 ON THE RELIGIOUS POSITION, CERTIFY SAME-SEX HOMES, OR DO
4 HOMES FOR ADOPTION.

5 BY MR. FIELD:

6 Q. WHAT DID YOU LEARN FROM BETHANY?

7 A. THEY HAD A SIMILAR STATEMENT. THEY INDICATED
8 THAT THEY ACTUALLY HAD SAME-SEX HOMES THAT WERE
9 CERTIFIED, BUT THEIR STATEMENT SAID THAT THEY WERE --
10 THEY WERE UNCLEAR ABOUT THEIR ABILITY TO SERVE SAME-SEX
11 COUPLES.

12 Q. AND DID YOU -- YOU SAID YOU CONTACTED OTHER
13 FOSTER-CARE AGENCIES AS WELL?

14 A. I DID. I CALLED A NUMBER OF FAITH-BASED
15 INSTITUTIONS THAT SAME DAY, AND ASKED THEM WHAT THEIR
16 POSITION WAS.

17 Q. WHAT DID YOU LEARN FROM ANY OF THEM?

18 MR. RIENZI: OBJECTION, HEARSAY.

19 MR. FIELD: SHE IS NOT OFFERING FOR THE --

20 THE COURT: SUSTAINED.

21 BY MR. FIELD:

22 Q. DID ANY OF THE OTHER AGENCIES TELL YOU THAT THEY
23 WOULD NOT CERTIFY SAME-SEX COUPLES?

24 MR. RIENZI: OBJECTION, HEARSAY.

25 THE COURT: SUSTAINED.

1 BY MR. FIELD:

2 Q. ARE YOU AWARE OF ANY OTHER AGENCIES THAT -- IN
3 FOSTER-CARE FOR THE CITY THAT WILL NOT CERTIFY SAME-SEX
4 COUPLES?

5 A. NO.

6 Q. SO WHAT DID YOU DO AFTER YOUR CONVERSATION WITH
7 JIM AMATO THAT YOU JUST REFERENCED?

8 A. SO AFTER MY CONVERSATION WITH JIM AMATO, I WAS
9 IMMEDIATELY CONCERNED BECAUSE IT WOULD PUT THE CITY IN A
10 POSITION OF DISCRIMINATING AGAINST ONE PARTICULAR
11 COMMUNITY. I KNEW THAT THAT ACTUALLY HAD TO BE EXPLORED
12 FURTHER, AND I MADE THE DETERMINATION THAT WE WOULD HAVE
13 TO MEET WITH THEM TO DISCUSS THESE MATTERS FURTHER, AND
14 WE WOULD HAVE TO DO AN ANALYSIS, TOO, OF HOW MANY
15 CHILDREN ARE WE TALKING ABOUT, WHAT IS THE IMPACT ON THE
16 KIDS THAT WE SERVED.

17 I ULTIMATELY DECIDED THAT IT WAS IN THE
18 BEST INTEREST TO CLOSE INTAKE, SO THAT I COULD LOOK MORE
19 DEEPLY INTO THIS ISSUE.

20 Q. BEST INTEREST OF THE HOME?

21 A. THE BEST INTEREST OF THE CHILDREN.

22 Q. AND WHY, IN YOUR VIEW, WAS IT IN THE BEST
23 INTEREST OF THE CHILDREN TO CLOSE INTAKE AT THAT TIME?

24 A. SO I MAKE DETERMINATIONS AROUND CLOSURE
25 REGARDING BEST INTEREST, EVEN IF THEY ARE ADMINISTRATIVE

1 OR PROGRAMMATIC, IN ORDER TO MAKE SURE THAT ANY
2 ADDITIONAL CHILDREN THAT WE'RE PUTTING THERE WERE NOT
3 GOING TO EITHER BE PUT IN HARM'S WAY, OR CAUSE ANY SORT
4 OF DISRUPTION. IN THIS PARTICULAR CIRCUMSTANCE, ADDING
5 ADDITIONAL CHILDREN TO THE CASELOAD COULD BE
6 PROBLEMATIC.

7 Q. AND WHAT -- JUST SO WE ARE CLEAR ON WHAT WE ARE
8 TALKING ABOUT, WHAT DOES "CLOSE INTAKE" MEAN TO YOU?

9 A. SO "CLOSE INTAKE" IS THAT WE WOULD NOT PROVIDE
10 ANY -- WE WOULD NOT SEND IN THE WAY OF A REFERRAL ANY
11 NEW CHILDREN TO BE PLACED IN A CATHOLIC SOCIAL SERVICES
12 FOSTER-CARE HOME.

13 Q. IS THAT ANY NEW CHILDREN IN ALL CIRCUMSTANCES,
14 OR ARE THERE EXCEPTIONS THAT DHS OBSERVES THOSE
15 CIRCUMSTANCES?

16 MR. RIENZI: OBJECTION, LEADING.

17 THE COURT: OVERRULED.

18 YOU CAN ANSWER.

19 THE WITNESS: SO EXCEPTIONS AS IT RELATED,
20 YES, ALWAYS SINCE IT IS IN THE CULTURE OF THE AGENCY TO LOOK
21 AT KIN, SO, ABSOLUTELY, THE PLACEMENT OF SIBLINGS, THE
22 ABILITY TO ALSO LOOK TO SEE THE HISTORY OF THE CHILD, IF
23 THEY HAD A RECENT PLACEMENT WITH THAT PROVIDER.

24 THE COURT: OKAY. PERHAPS THIS WOULD BE AN
25 APPROPRIATE TIME TO RECESS UNTIL THURSDAY AT 9:30.

1 MR. FIELD: THANK YOU, YOUR HONOR.

2 (ALL RISE.)

3

4 I N D E X

5 WITNESS DIRECT CROSS REDIRECT RECROSS

6 KIMBERLY ALI - 3 24 27

7 JAMES AMATO 3 80 113 123

8 CYNTHIA FIGUEROA 148

9

10 EXHIBITS PAGE

11 PLAINTIFF EXHIBITS 1 THROUGH 12 80

12

13 I CERTIFY THAT THE FOREGOING IS A CORRECT

14 TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE

15 ABOVE-ENTITLED MATTER.

16

17

18 DATE OFFICIAL COURT REPORTER

19 LYNN MCCLOSKEY, RPR

20

21

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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF PENNSYLVANIA

3 - - -

4 SHARONELL FULTON, ET AL : CIVIL DOCKET FOR CASE
5 : NO. 18-2075
6 -VS- :
7 :
8 CITY OF PHILADELPHIA, ET AL :
9

10 - - -

11 PHILADELPHIA, PA.

12 JUNE 21, 2018

13 BEFORE HONORABLE JUDGE PETRESE B. TUCKER

14 TEMPORARY RESTRAINING ORDER

15 DAY 3

16 APPEARANCES:

17 FOR THE PLAINTIFF: BECKET FUND FOR RELIGIOUS LIBERTY
18 BY: MARK L. RIENZI, ESQ.
19 1200 NEW HAMPSHIRE AVE, N.W.
20 SUITE 700
WASHINGTON, DC 20036

21 FOR THE DEFENDANTS: CITY OF PHILADELPHIA LAW DEPARTMENT
22 BY: ELEANOR N. EWING, ESQ.
23 BENJAMIN H. FIELD, ESQ.
24 SCHAUDRA OLIVER, ESQ.
25 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

1 THE COURT: GOOD MORNING.

2 ALL COUNSEL: GOOD MORNING, YOUR HONOR.

3 THE COURT: YOU MAY BE SEATED.

4 WILL THE WITNESS TAKE THE WITNESS STAND.

5 YOU CAN STATE YOUR NAME.

6 THE WITNESS: CYNTHIA FIGUEROA.

7 CONTINUED DIRECT EXAMINATION

8 BY MR. FIELD:

9 Q. GOOD MORNING, COMMISSIONER FIGUEROA.

10 A. GOOD MORNING.

11 Q. THANK YOU FOR BEING BACK WITH US TODAY. IF YOU
12 GIVE ME A MOMENT, I AM JUST GOING TO PREPARE MY NOTES
13 AND START YOUR QUESTIONING AGAIN.

14 SO COMMISSIONER, STARTING TODAY, I JUST
15 WANT TO RETURN TO THE TOPIC WE WERE TALKING ABOUT WHEN
16 WE CLOSED ON WEDNESDAY AND MAKE SURE IT IS CLEAR WHAT WE
17 ARE TALKING ABOUT AS WE GO FORWARD. TOWARDS THE END OF
18 YOUR TESTIMONY YOU TALKED ABOUT BEING CONTACTED BY A
19 REPORTER. REMIND US WHAT YOU LEARNED FROM THAT
20 REPORTER.

21 A. SO THE REPORTER ASKED IF I WAS AWARE OF ANY
22 ORGANIZATIONS, SPECIFICALLY BETHANY CHRISTIAN SERVICES
23 AND CATHOLIC SOCIAL SERVICES, DISCRIMINATING AGAINST --
24 OFFERING SUPPORT AND SERVICES TO SAME-SEX COUPLES WHO
25 WERE INTERESTED IN BECOMING FOSTER PARENTS.

1 Q. AND WHAT DID YOU UNDERSTAND THE NATURE OF THOSE
2 TWO AGENCIES YOU REFERENCED, BETHANY AND CSS'S,
3 OBJECTION TO BE?

4 A. I UNDERSTOOD THEIR OBJECTION TO BE TO NOT BE
5 WILLING TO CERTIFY SAME-SEX COUPLES.

6 Q. WHAT WAS THE NATURE OF THAT OBJECTION? WAS IT
7 SECULAR, WAS IT RELIGIOUS, WAS IT SOMETHING ELSE?

8 A. AS INDICATED BY JAMES AMATO, IT WAS BASED ON
9 RELIGION.

10 Q. AND APPROXIMATELY WHEN, TO THE BEST OF YOUR
11 RECOLLECTION, WAS THIS OUTREACH FROM A REPORTER?

12 A. IT WAS ON MARCH 9TH, AND I SUBSEQUENTLY SPOKE TO
13 JAMES AMATO ON THE SAME DAY.

14 Q. SO SHORTLY AFTER THE CALL FROM THE REPORTER?

15 A. VERY SHORTLY AFTER THE CALL FROM THE REPORTER I
16 CALLED JAMES AMATO AND THEN WE MADE A NUMBER OF CALLS
17 THAT DAY.

18 Q. AND IS IT ON THAT CALL THAT JAMES AMATO TOLD YOU
19 WHAT YOU JUST RELATED, THAT IT WAS A RELIGIOUS
20 OBJECTION?

21 A. HE MADE IT CLEAR THAT BASED ON THEIR RELIGIOUS
22 BELIEFS THAT THEY WOULD NOT DO THE CERTIFICATION PROCESS
23 OF THE SAME-SEX COUPLE AND THEY WOULD NOT DO HOME
24 STUDIES FOR ADOPTION FOR SAME-SEX COUPLES.

25 Q. AND ON WEDNESDAY YOU SAID THAT AFTER THAT CALL

1 YOU CALLED OTHER FAITH-BASED FOSTER CARE AGENCIES?

2 A. YES, THAT'S CORRECT. I CALLED A MAJORITY OF OUR
3 PROVIDERS.

4 Q. AND WOULD YOU HAVE ANY REASON AT THAT POINT TO
5 BELIEVE THAT A SECULAR AGENCY WOULD HAVE HAD AN
6 OBJECTION TO SERVING SAME-SEX COUPLES?

7 A. I DID NOT, NO.

8 Q. AND SO UPON LEARNING THIS -- DID YOU SAY MARCH
9 9TH, MARCH 10TH?

10 A. IT WAS MARCH 9TH.

11 Q. MARCH 9TH. WHAT WAS YOUR -- WHAT CONCERNS DID
12 THIS INFORMATION RAISE FOR YOU AS COMMISSIONER?

13 A. MY CONCERN IS THAT THERE WAS A PARTICULAR
14 COMMUNITY THAT WAS BEING EXCLUDED FROM ALLOWING TO
15 BECOME FOSTER PARENTS. AND I WAS CONCERNED THAT THIS
16 WAS POSSIBLY IN VIOLATION OF THEIR CONTRACT, AND SO
17 SUBSEQUENTLY LOOKED AT WORKING WITH OUR LAW DEPARTMENT
18 TO DETERMINE WHAT CHALLENGES THE POSITION THAT CATHOLIC
19 SOCIAL SERVICES TOOK IN REGARD TO THEIR ABILITY TO WORK
20 WITH SAME-SEX COUPLES.

21 Q. AND WHY IS IT CONCERNING TO YOU AS COMMISSIONER
22 IF A PARTICULAR COMMUNITY IS BEING EXCLUDED IN SOME WAY?

23 A. I THINK IT'S SIGNIFICANT IN A NUMBER OF FACTORS.
24 ONE, AS PHILADELPHIA IS RESPONSIBLE FOR SERVING ALL
25 CITIZENS, IT SENDS A SIGNAL, A VERY STRONG SIGNAL TO

1 THAT COMMUNITY THAT THEIR RIGHTS ARE NOT PROTECTED AND
2 WE DON'T CARE ABOUT THEM. MORE IMPORTANTLY, WHEN YOU
3 THINK ABOUT YOUTH THAT ARE BEING SERVED WHO MIGHT
4 IDENTIFY AS LGBTQU, THEY WILL BECOME ADULTS AT SOME
5 TIME. SO YOU ARE SENDING A SIGNAL TO THOSE YOUTH THAT
6 WHILE WE MIGHT SUPPORT YOU NOW, WE WON'T SUPPORT YOUR
7 RIGHTS AS AN ADULT.

8 Q. AND YOU TESTIFIED ON WEDNESDAY THAT YOU COULD
9 NOT TAKE WHAT I UNDERSTAND TO BE CALLED AN INTAKE
10 CLOSURE?

11 A. THAT IS CORRECT.

12 Q. TELL US AGAIN WHY YOU DID THAT.

13 A. SO I CLOSED INTAKE AND I BELIEVE I ALSO SHARED
14 THIS ON WEDNESDAY IS THAT I HAVE CLOSED INTAKE IN OTHER
15 CIRCUMSTANCES FOR OTHER PROVIDERS AS AN OPPORTUNITY TO
16 GET A BETTER SENSE OF THE MAGNITUDE OF THE ISSUE AND
17 ALSO TO MAKE SURE THAT WE STOP ANY FURTHER DAMAGE THAT
18 MIGHT OCCUR. AND FOR ME IN THIS INSTANCE IT WAS MAKING
19 SURE THAT WE WERE NOT PROVIDING ADDITIONAL CHILDREN TO
20 BE SENT TO CATHOLIC SOCIAL SERVICES OR BETHANY AT THE
21 TIME.

22 Q. AND YOU SAID -- YOU JUST USED THE WORD PREVENT
23 ANY FURTHER DAMAGE TO OCCUR. HOW, IN YOUR VIEW, COULD
24 SENDING ADDITIONAL CHILDREN CREATE THE POSSIBILITY OF
25 FURTHER DAMAGE?

1 A. AT THE POINT IN WHICH I CLOSED INTAKE, IT WASN'T
2 CLEAR TO ME, BUT IT BECAME ABUNDANTLY CLEAR THEREAFTER,
3 THAT THE ABILITY TO COMPLY WITH THE FULL ENTIRETY OF
4 THEIR CONTRACT WAS UNCERTAIN. AND SO IF YOU ARE NOT
5 ABLE TO COMPLY WITH YOUR CONTRACT, CERTAINLY IT PUTS --
6 YOU KNOW, IT'S A CONCERN FOR THE CITY, IT WAS A CONCERN
7 FOR ME TO NOT MAKE SURE THAT MORE CHILDREN COULD HAVE
8 BEEN DISRUPTED IF WE CONTINUED TO SEND KIDS TO CATHOLIC
9 SOCIAL SERVICES.

10 Q. AND JUST SO I FULLY UNDERSTAND, HOW COULD MORE
11 -- HOW COULD CHILDREN BE DISRUPTED? WHAT ARE YOU
12 LOOKING AT AND THINKING ABOUT WHEN YOU SAY THAT?

13 A. SO IF WE -- IF CATHOLIC SOCIAL SERVICES COULD
14 NOT COMPLY AND THEY REFUSED TO ENTER INTO A FULL
15 CONTRACT, WE WOULD HAVE TO MOVE ALL OF THE CHILDREN WHO
16 ARE CURRENTLY SERVED BY CATHOLIC SOCIAL SERVICES TO
17 ANOTHER PROVIDER. AND SO CERTAINLY A PLACEMENT
18 DISRUPTION IS NOT AT ALL WHAT THE CITY WANTS TO OR
19 INTENDS TO DO, AND CERTAINLY NOT A POSITION THAT WE
20 WANTED TO FIND OURSELVES IN.

21 Q. SO YOU CLOSED INTAKE TO MAKE SURE FEWER CHILDREN
22 -- NO ADDITIONAL CHILDREN WERE ADDED TO THAT MIX?

23 A. THAT'S CORRECT.

24 Q. YOU MENTIONED HAVING CLOSED INTAKE IN OTHER
25 INSTANCES IN THE PAST.

1 A. YES.

2 Q. HOW HAS THAT BEEN HANDLED ADMINISTRATIVELY
3 WITHIN DHS? WHAT DO YOU DO WHEN YOU CLOSE INTAKE?

4 A. GENERALLY, INFORMATION IS BROUGHT TO MY
5 ATTENTION OR I AM MADE AWARE OF DIRECTLY. AND I DISCUSS
6 THOSE MATTERS WITH MY EXECUTIVE TEAM AND MAKE A
7 DETERMINATION THAT IT'S IN THE BEST INTEREST TO SHUT
8 INTAKE. SO WE HAVE DONE THAT FOR ADMINISTRATIVE
9 REASONS, AND WE HAVE DONE IT FOR PROGRAMMATIC REASONS.
10 AND THE DURATION OF THE INTAKE CLOSURE IS REALLY IN
11 PLACE UNTIL THE ISSUE IS REMEDIATED OR TAKEN CARE OF.

12 Q. DOES DHS PERMIT EXCEPTIONS WHEN IT CLOSSES
13 INTAKE?

14 A. ABSOLUTELY. IN THE CASE OF CATHOLIC SOCIAL
15 SERVICES WE HAVE MADE A NUMBER OF EXCEPTIONS.

16 Q. IN WHAT CONTEXT ARE EXCEPTIONS CONSIDERED?

17 A. SO EXCEPTIONS HAVE BEEN CONSIDERED AS IT RELATES
18 TO KEEPING SIBLINGS TOGETHER, AS WELL AS IN CASES WHERE
19 A CHILD HAD RECENTLY RESIDED WITH A FOSTER PARENT AND
20 COULD RETURN BACK TO A HOME THAT THE CHILD WAS FAMILIAR
21 WITH.

22 Q. AND IN THE PAST INSTANCES OF CLOSING INTAKE,
23 HAVE SIMILAR EXCEPTIONS BEEN GRANTED?

24 A. ABSOLUTELY. WE JUST LAST WEEK HAD AN EXPERIENCE
25 WHERE ANOTHER ORGANIZATION THAT HAS THEIR INTAKE

1 CURRENTLY CLOSED ALSO FOR ADMINISTRATIVE REASONS, THE
2 CRU MADE MYSELF AND KIMBERLY ALI AWARE AND ASKED FOR US
3 TO CONSIDER AN EXCEPTION, AND WE SUBSEQUENTLY DID SO.

4 Q. AND THE CRU YOU TALKED ABOUT YESTERDAY IS
5 CENTRAL REFERRAL UNIT?

6 A. THAT IS CORRECT.

7 Q. AND THE CENTRAL REFERRAL UNIT IS RESPONSIBLE FOR
8 PLACEMENTS, IS THAT CORRECT?

9 A. THEY'RE RESPONSIBLE FOR HELPING DETERMINE THE
10 LEVEL OF CARE AND SUBSEQUENTLY HELPING TO IDENTIFY THE
11 BEST PLACEMENT FOR THE YOUTH THAT IS PRESENTED TO THE
12 CRU.

13 Q. AND IN PAST INTAKE CLOSURES, HAS THE CENTRAL
14 REFERRAL UNIT BEEN INVOLVED IN MAKING EXCEPTIONS FOR, I
15 BELIEVE YOU SAID, KINSHIP AND WHEN THERE WAS A
16 RELATIONSHIP WITH A PRIOR FOSTER PARENT?

17 A. YES. IT'S VERY STANDARD PRACTICE AND I WOULD
18 JUST HIGHLIGHT THAT WE ARE IN CONSTANT COMMUNICATION
19 WITH THE CRU. SO THERE IS -- ON ANY GIVEN DAY, THERE
20 ARE COMPLICATED HIGH PROFILE CASES THAT COME TO THE
21 ATTENTION OF BOTH DEPUTY COMMISSIONER ALI AND MYSELF.
22 AND SO IT'S PRETTY STANDARD PRACTICE WHEN THEY ARE AWARE
23 THAT THERE IS A CLOSURE THAT THEY WOULD BRING SOMETHING
24 TO OUR ATTENTION. SOMETIMES THERE IS AN ISSUE OF A
25 COURT ORDER OR THERE'S SOMETHING THAT COMES UP THAT

1 MAKES THEM RECOGNIZE THAT AN EXCEPTION SHOULD BE
2 CONSIDERED, AND PARTICULARLY WHERE THAT IS MOST
3 SIGNIFICANT IS KIN, BECAUSE THAT HAS BEEN SUCH A
4 CULTURAL NORM FOR OUR DEPARTMENT.

5 MR. RIENZI: OBJECTION, MOVE TO STRIKE.
6 THAT'S NOT RESPONSIVE TO THE QUESTION.

7 THE COURT: OVERRULED.

8 BY MR. FIELD:

9 Q. WITH RESPECT TO CSS, THE INTAKE CLOSURE YOU
10 REFERENCED, DOES THAT STILL REMAIN IN PLACE?

11 A. YES.

12 Q. WHY DOES THAT STILL REMAIN IN PLACE?

13 A. BECAUSE WE HAVE NOT RESOLVED THE ISSUE, AND CSS
14 HAS INDICATED THAT THEY DO NOT WANT TO ENTER INTO A FULL
15 CONTRACT WITH THE CITY, IN WHICH CASE I DON'T WANT TO
16 SEND ADDITIONAL CHILDREN WHOSE SUBSEQUENT SITUATION
17 COULD BE DISRUPTED.

18 Q. AS DHS COMMISSIONER, WOULD IT -- IS IT -- WOULD
19 DHS OFFER CATHOLIC SOCIAL SERVICES THE SAME FULL
20 CONTRACT IT IS OFFERING THE OTHER FOSTER CARE AGENCIES?

21 A. YES.

22 MR. RIENZI: OBJECTION, SPECULATION.

23 THE COURT: OVERRULED.

24 THE WITNESS: YES, AND WE HAVE.

25 BY MR. FIELD:

1 Q. AND HAS DHS OFFERED CATHOLIC SOCIAL SERVICES AN
2 ALTERNATIVE?

3 A. YES, WE HAVE.

4 Q. AND WHAT IS THAT ALTERNATIVE?

5 A. WE OFFERED A LIMITED CONTRACT TO ENSURE THAT
6 THEY COULD CONTINUE TO SEARCH THE CHILDREN WHO ARE
7 CURRENTLY PLACED IN FOSTER CARE WITHOUT SENDING IN
8 ADDITIONAL REFERRALS. IT WAS GOOD TO HEAR MR. AMATO
9 STATE THAT THEY WOULD CONSIDER ENTERING INTO A LIMITED
10 CONTRACT.

11 MR. RIENZI: OBJECTION, MOVE TO STRIKE
12 THE NARRATIVE.

13 THE COURT: OVERRULED.

14 BY MR. FIELD:

15 Q. HAVE YOU BEEN IN SITUATIONS IN THE PAST IN WHICH
16 PROVIDERS ARE CLOSING OR FOR SOME OTHER REASON UNABLE TO
17 CONTINUE LONG-TERM PROVIDING SERVICES?

18 A. YES. UNFORTUNATELY IN MY TENURE I HAVE HAD TO
19 EXPERIENCE THAT A FEW TIMES.

20 Q. AND IN THOSE EXPERIENCES, WHAT HAVE YOU DONE TO
21 WORK WITH PROVIDERS TO ENSURE THE BEST INTEREST OF THE
22 CHILDREN?

23 A. SO IN A NUMBER OF EXPERIENCES WE HAVE ACTUALLY
24 NEGOTIATED A CONTRACT IN -- UNDERSTANDING THAT THEY WERE
25 GOING TO HAVE TO CLOSE, BUT UNDERSTANDING ALSO THAT WE

1 NEEDED THE STAFFING AND WE NEEDED THE ABILITY TO ASSURE
2 QUALITY SERVICES AND THE SAFETY OF CHILDREN. AND SO WE
3 NEGOTIATED THE STAFFING LEVELS AND THE CONTRACTED
4 AMOUNTS. IN ONE PARTICULAR CASE WE HAD AN INDIVIDUAL,
5 AND I KNOW THIS GETS VERY MUCH INTO JARGON AROUND OUR
6 CONTRACTS, BUT WE PAY A LOT OF THE PLACEMENT SERVICES IN
7 WHAT WE CALL A PER DIEM. SO THAT'S LIKE A SET AMOUNT OF
8 MONEY PER CHILD PER DAY. AND THEN WE HAVE THE ABILITY
9 TO DO WHAT IS CALLED A COST REIMBURSEMENT CONTRACT.

10 IN ONE INSTANCE WHEN WE KNEW WE WERE
11 CLOSING THE PROGRAM, WE KNEW IT WAS NOT FINANCIALLY
12 VIABLE OR IN THE BEST INTEREST OF THE KIDS FROM A
13 PROGRAMMATIC STANDPOINT, THEY WERE NOT GOING TO BE ABLE
14 TO KEEP STAFF, SO WE CHANGED IT FROM A PER DIEM CONTRACT
15 TO A COST REIMBURSEMENT, AND WE GUARANTEED THEM THE
16 ABILITY TO HAVE A SET AMOUNT OF STAFF.

17 IN ONE OTHER INSTANCE WE ACTUALLY OFFERED
18 STAY BONUSES FOR STAFF TO MAKE SURE THAT WE HAD THE
19 EXACT STAFFING PATTERN WE NEEDED UNTIL CLOSURE.

20 Q. AND DO YOU HAVE ANY REASON TO THINK YOU WOULD
21 NOT ENGAGE IN NEGOTIATIONS OF THIS SORT WITH CATHOLIC
22 SOCIAL SERVICES?

23 MR. RIENZI: OBJECTION, SPECULATION.

24 THE WITNESS: NO.

25 BY MR. FIELD:

1 Q. WOULD YOU ENGAGE IN NEGOTIATIONS OF THIS SORT
2 WITH THE CATHOLIC SOCIAL SERVICES?

3 MR. RIENZI: OBJECTION, SPECULATION.

4 THE COURT: OVERRULED.

5 THE WITNESS: YES, THAT'S WITHIN MY
6 PURVIEW AS THE COMMISSIONER, AND I WOULD NEGOTIATE THOSE
7 TERMS.

8 BY MR. FIELD:

9 Q. REAL BRIEFLY, YOU MENTIONED WHEN YOU WERE FIRST
10 CONTACTED BY A REPORTER TWO AGENCIES, CATHOLIC SOCIAL
11 SERVICES AND BETHANY, I BELIEVE?

12 A. THAT IS CORRECT.

13 Q. WHAT DOES BETHANY DO FOR DHS?

14 A. FOSTER CARE SERVICES.

15 Q. SO IT'S A SIMILAR CONTRACT?

16 A. YES.

17 Q. AND DID YOU CLOSE INTAKE WITH REGARD TO BETHANY?

18 A. YES, I DID.

19 Q. DOES IT REMAIN CLOSED?

20 A. AS OF TODAY IT REMAINS CLOSED, YES.

21 Q. AND IS IT YOUR EXPECTATION THAT BETHANY WILL
22 SIGN A FULL CONTRACT FOR THE COMING YEAR?

23 THE WITNESS: YES.

24 MR. RIENZI: OBJECTION, SPECULATION.

25 THE COURT: OVERRULED.

1 THE WITNESS: YES. IT'S MY EXPECTATION.
2 IN COMMUNICATION IT HAS BEEN INDICATED THAT WE WILL
3 LIKELY ENTER INTO A FULL CONTRACT WITH BETHANY.

4 BY MR. FIELD:

5 Q. AND IS IT YOUR UNDERSTANDING OF THE COMING
6 FISCAL YEAR CONTRACT THAT IT INCLUDES A CLAUSE THAT
7 PROVIDERS NOT DISCRIMINATE IN THE RECRUITMENT AND
8 CERTIFICATION OF FOSTER PARENTS?

9 MR. RIENZI: OBJECTION, SPECULATION,
10 HEARSAY AND BEST EVIDENCE RULE. THE DOCUMENT SPEAKS FOR
11 ITSELF.

12 THE COURT: OVERRULED.

13 THE WITNESS: YES.

14 MR. FIELD: MAY I HAVE A MOMENT, YOUR
15 HONOR?

16 THE COURT: YES.

17 MR. FIELD: THANK YOU.

18 (BRIEF PAUSE IN THE PROCEEDING.)

19 MR. FIELD: THAT'S ALL I HAVE AT THE
20 MOMENT, YOUR HONOR.

21 THE COURT: OKAY. CROSS-EXAMINE.

22 MR. FIELD: THANK YOU.

23 THE WITNESS: THANK YOU.

24 MR. RIENZI: YOUR HONOR, CAN I TAKE A
25 VERY SHORT RECESS SO THAT I CAN CONFER WITH MY

1 CO-COUNSEL AND LOOK AT MY NOTES SO I CAN DO THIS AS
2 BRIEFLY AS POSSIBLE.

3 THE COURT: I WILL GIVE YOU TWO MINUTES.

4 MR. RIENZI: THAT'S ALL I NEED. THANK
5 YOU, YOUR HONOR.

6 (BRIEF PAUSE IN THE PROCEEDING.)

7 CROSS-EXAMINATION

8 BY MR. RIENZI:

9 Q. GOOD MORNING, COMMISSIONER FIGUEROA.

10 A. GOOD MORNING.

11 Q. YOU HAVE HAD A LONG CAREER DOING A VARIETY OF
12 DIFFERENT KINDS OF SOCIAL JUSTICE WORK?

13 A. THAT IS CORRECT.

14 Q. I BELIEVE YOU SAID YESTERDAY YOU WENT TO A
15 JESUIT COLLEGE?

16 A. I DID.

17 Q. AND THEN YOU STARTED YOUR CAREER IN THE JESUIT
18 VOLUNTEER CORPS?

19 A. YES, THAT'S CORRECT.

20 Q. WHAT INSPIRED YOU TO DO THAT?

21 A. MOSTLY MY PARENTS AND A HISTORY -- LONG
22 TRADITION. WE HAVE BELIEVED FAITH AND SOCIAL JUSTICE
23 ARE GOOD TENETS TO ENSURE THAT THOSE WITH LESS HAVE THE
24 SAME OPPORTUNITIES THAT WE HAVE BEEN GIVEN.

25 Q. AND THOSE EXPERIENCES PROBABLY GAVE YOU A GOOD

1 UNDERSTANDING OF WHAT CATHOLIC NONPROFIT SERVICE GROUPS
2 ARE LIKE?

3 A. ABSOLUTELY.

4 Q. YOU KNOW THAT CATHOLIC LOSES MONEY DOING FOSTER
5 CARE?

6 A. NO, I AM NOT AWARE OF THAT.

7 Q. DO YOU KNOW THAT CATHOLIC IS A RELIGIOUS
8 ORGANIZATION?

9 A. I DO KNOW THAT.

10 Q. AND AS DHS COMMISSIONER WOULD YOU SAY THAT
11 CATHOLIC HAS A STRONG COMMITMENT TO SERVICE?

12 A. YES.

13 Q. AND FOR CATHOLIC THAT COMMITMENT TO SERVICE IS
14 PART OF HOW THEY PRACTICE THEIR RELIGIOUS BELIEFS?

15 A. I WOULD NOT PROVIDE THAT EXPECTATION.

16 Q. DO YOU THINK THERE'S A DIFFERENT REASON?

17 A. THERE COULD BE.

18 Q. YOU HAVE NO OPINION EITHER WAY AS TO WHETHER
19 THEY DO IT FOR RELIGIOUS REASONS?

20 A. I DON'T KNOW THAT IT IS FOR ME TO SAY.

21 Q. I'M ASKING, DO YOU HAVE AN OPINION?

22 A. NO.

23 MR. FIELD: OBJECTION, CALLS FOR
24 SPECULATION.

25 THE COURT: OVERRULED.

1 BY MR. RIENZI:

2 Q. YOU HAVE BEEN DHS COMMISSIONER SINCE WHEN?

3 A. MY TENURE BEGAN IN SEPTEMBER OF 2016.

4 Q. DO YOU HAVE THAT JOB FOR A PARTICULAR TERM OF
5 YEARS?

6 A. NO.

7 Q. YOU ARE AN AT-WILL EMPLOYEE?

8 A. I'M AN EXEMPT EMPLOYEE WITH THE CITY OF
9 PHILADELPHIA.

10 Q. HOW MANY FOSTER AGENCIES ARE THERE IN THE CITY
11 RIGHT NOW?

12 A. THERE ARE 30 AGENCIES IN THE CITY OF
13 PHILADELPHIA.

14 Q. DOES THAT INCLUDE CATHOLIC WHEN YOU SAY THAT?

15 A. IT DOES.

16 Q. AND BETHANY?

17 A. YES.

18 Q. SO OF THOSE, HOW MANY PROVIDE HOME STUDIES FOR
19 SAME-SEX COUPLES?

20 A. TO MY KNOWLEDGE, ALL OF THEM SHOULD.

21 Q. HOW MANY DO?

22 A. ALL OF THEM. EXCEPT FOR CATHOLIC SOCIAL
23 SERVICES.

24 Q. SO IT IS YOUR TESTIMONY THAT 28 TODAY PROVIDE
25 HOME STUDIES FOR SAME-SEX COUPLES?

1 A. WELL, ACTUALLY BETHANY DOES BECAUSE THEY HAVE
2 CERTIFIED A NUMBER OF SAME-SEX COUPLES, SO I WOULD JUST
3 SAY CATHOLIC.

4 Q. SO TODAY 29 AGENCIES WILL DO HOME STUDIES FOR
5 SAME-SEX COUPLES?

6 A. FROM MY KNOWLEDGE.

7 Q. IF CATHOLIC CLOSES THEIR PROGRAM, HOW MANY
8 FOSTER AGENCIES IN THE CITY WILL PROVIDE HOME STUDIES TO
9 SAME-SEX COUPLES?

10 A. THE SAME --

11 MR. FIELD: OBJECTION, CALLS FOR
12 SPECULATION.

13 THE COURT: OVERRULED.

14 THE WITNESS: THE SAME NUMBER, I PRESUME.

15 BY MR. RIENZI:

16 Q. AND IF CATHOLIC IS ALLOWED TO RESUME ITS PAST
17 PRACTICE, HOW MANY AGENCIES IN THE CITY WILL PROVIDE
18 HOME STUDIES FOR SAME-SEX COUPLES?

19 MR. FIELD: OBJECTION, CALLS FOR
20 SPECULATION.

21 THE COURT: OVERRULED.

22 THE WITNESS: 29.

23 BY MR. RIENZI:

24 Q. SO NO MATTER HAPPENS IN THIS CASE IT IS YOUR
25 TESTIMONY THERE WILL BE 29 AGENCIES IN THE CITY THAT

1 PROVIDE HOME STUDIES FOR SAME-SEX COUPLES, CORRECT?

2 MR. FIELD: OBJECTION, CALLS FOR
3 SPECULATION.

4 THE COURT: OVERRULED.

5 THE WITNESS: YES.

6 BY MR. RIENZI:

7 Q. TO YOUR KNOWLEDGE, DHS HAS RECEIVED NO
8 COMPLAINTS AGAINST CATHOLIC FOR OPERATING ACCORDING TO
9 ITS RELIGIOUS BELIEFS, CORRECT?

10 A. THAT IS CORRECT.

11 Q. TO YOUR KNOWLEDGE, YOU HAVE RECEIVED NO
12 COMPLAINTS AGAINST CATHOLIC FOR PROVIDING FOSTER CARE
13 SERVICES ACCORDING TO ITS RELIGIOUS BELIEFS, CORRECT?

14 A. NONE THAT I AM -- NONE THAT I CAN RECALL.

15 Q. TO YOUR KNOWLEDGE, YOU HAVE RECEIVED NO
16 COMPLAINTS AGAINST CATHOLIC FOR FAILING TO PERFORM A
17 HOME STUDY FOR SOMEONE WHO WANTED IT, CORRECT?

18 A. I CAN'T ANSWER THAT UNEQUIVOCALLY.

19 Q. BUT YOU ARE NOT AWARE OF ANY AS YOU SIT HERE
20 TODAY?

21 A. I AM NOT AWARE OF ANY, NO.

22 Q. TO YOUR KNOWLEDGE, NOT A SINGLE PROSPECTIVE LGBT
23 FOSTER PARENT WAS UNABLE TO BECOME A FOSTER PARENT
24 BECAUSE OF CATHOLIC'S RELIGIOUS EXERCISE, CORRECT?

25 A. I CAN'T ANSWER THAT.

1 Q. YOU DON'T KNOW EITHER WAY?

2 A. I CAN'T ANSWER THAT.

3 Q. ARE YOU AWARE OF ANY WHO ARE UNABLE TO BECOME A
4 FOSTER PARENT BECAUSE OF CATHOLIC?

5 A. I CAN'T ANSWER THAT.

6 Q. YOU CANNOT ANSWER BECAUSE YOU ARE NOT AWARE OF
7 ANY, CORRECT?

8 A. I CAN'T ANSWER THAT BECAUSE I DON'T KNOW IF
9 ANYBODY WAS TURNED AWAY.

10 Q. SO FAR AS DHS IS AWARE, THE NUMBER OF FOSTER
11 PARENTS TURNED AWAY BY CATHOLIC WHO WANTED A HOME STUDY
12 FOR AN LGBT COUPLE IS ZERO, CORRECT?

13 A. I CAN'T ANSWER THAT.

14 MR. FIELD: SHE JUST SAID SHE IS UNAWARE
15 IF ANYBODY WAS TURNED AWAY, YOUR HONOR.

16 THE COURT: SHE ANSWERED SEVERAL TIMES.
17 BY MR. RIENZI:

18 Q. YOU SAID YOU ARE RESPONSIBLE FOR ABOUT 1500
19 EMPLOYEES?

20 A. THAT IS CORRECT.

21 Q. TO YOUR KNOWLEDGE, NOT ONE OF THEM HAS TOLD YOU
22 ABOUT ANY COUPLE REJECTED BY CATHOLIC BECAUSE OF ITS
23 RELIGIOUS EXERCISE?

24 A. NOT THAT I CAN RECALL.

25 Q. ON YOUR FOSTER CARE WEBSITE YOU TELL PROSPECTIVE

1 PARENTS TO LOOK FOR AN AGENCY THAT WOULD BE A GOOD FIT
2 FOR THEM, CORRECT?

3 A. I DON'T HAVE IT IN FRONT OF ME, SO....

4 MR. RIENZI: PERMISSION TO APPROACH, YOUR
5 HONOR.

6 THE COURT: YES.

7 BY MR. RIENZI:

8 Q. I AM HANDING YOU A DOCUMENT LABELED PLAINTIFF'S
9 EXHIBIT 14. DO YOU RECOGNIZE THAT DOCUMENT?

10 A. I DO.

11 Q. WHAT IS THAT?

12 A. IT'S THE PHILADELPHIA WEBSITE. IT'S THE
13 PHILLY.GOV WEBSITE.

14 Q. AND YOU ARE AN EMPLOYEE OF THE CITY OF
15 PHILADELPHIA?

16 A. I AM.

17 Q. AND DHS IS PART OF THE CITY OF PHILADELPHIA
18 GOVERNMENT?

19 A. THAT IS CORRECT.

20 Q. I WOULD LIKE YOU TO LOOK AT THE BOTTOM OF THE
21 SECOND PAGE, PLEASE.

22 A. SECOND OR THIRD?

23 Q. BOTTOM OF THE SECOND SAYS: CHOOSE A FOSTER CARE
24 AGENCY. DO YOU SEE THAT?

25 A. YES.

1 Q. AND THAT SAYS: DHS WORKS WITH MANY STATE
2 LICENSED AGENCIES TO PROVIDE FOSTER CARE. BROWSE THE
3 LIST OF FOSTER AGENCIES TO FIND THE BEST FIT FOR YOU.
4 YOU WANT TO FEEL CONFIDENT AND COMFORTABLE WITH THE
5 AGENCY YOU CHOOSE. THIS AGENCY WILL BE A BIG SUPPORT TO
6 YOU DURING YOUR RESOURCE PARENT JOURNEY. ONCE YOU HAVE
7 FOUND ONE THAT YOU LIKE, CALL THEM TO FIND OUT HOW TO
8 BEGIN THE CERTIFICATION PROCESS.

9 DID I READ THAT CORRECTLY SO FAR?

10 A. YOU DID, YES.

11 Q. IS ALL OF THAT TRUE TO THE BEST OF YOUR
12 KNOWLEDGE?

13 A. ABSOLUTELY.

14 Q. OKAY. WHY DO YOU WANT FOSTER PARENTS TO FIND AN
15 AGENCY THAT THEY WILL FEEL CONFIDENT AND COMFORTABLE
16 WITH?

17 A. BECAUSE IT'S THE CHOICE OF THE FAMILY TO
18 DETERMINE WHO THEY WANT TO BE SERVED BY.

19 Q. AND WHY WOULD YOU LIKE THEM TO BE CONFIDENT AND
20 COMFORTABLE?

21 A. BECAUSE IT IS THEIR DECISION.

22 Q. I AM NOT ASKING WHOSE DECISION IT IS. I'M
23 ASKING WHY WOULD YOU -- HERE IT SAYS YOU WOULD LIKE THEM
24 TO FEEL CONFIDENT AND COMFORTABLE. WHY?

25 A. BECAUSE THEY ARE DECIDING TO BECOME A FOSTER

1 PARENT, SO THEY HAVE TO FEEL COMFORTABLE AND CONFIDENT
2 IN THEIR DECISION.

3 Q. YOU WOULD LIKE THEM TO HAVE A GOOD FIT WITH THE
4 AGENCY?

5 A. I'D LIKE THEM TO BE COMFORTABLE WITH THEIR
6 DECISION.

7 Q. YOU WOULD LIKE THEM TO HAVE A GOOD FIT WITH THE
8 AGENCY?

9 A. I WOULD LIKE THEM TO BE COMFORTABLE WITH THEIR
10 DECISION.

11 Q. WOULD YOU LIKE THEM TO HAVE A GOOD FIT WITH THE
12 AGENCY?

13 MR. FIELD: ASKED AND ANSWERED, YOUR
14 HONOR.

15 MR. RIENZI: YOUR HONOR, SHE HAS NOT
16 ANSWERED.

17 THE COURT: OVERRULED. SHE CAN ANSWER.
18 BY MR. RIENZI:

19 Q. WOULD YOU LIKE THEM TO HAVE A GOOD FIT WITH THE
20 AGENCY?

21 A. YES.

22 Q. AGENCIES ARE ALLOWED TO HAVE DIFFERENT
23 REQUIREMENTS FOR CERTIFYING FAMILIES, CORRECT?

24 A. NO.

25 Q. WOULD YOU READ FOR ME THE LAST SENTENCE OF THAT

1 PARAGRAPH WE WERE JUST LOOKING AT, PLEASE?

2 A. OH, DIFFERENT REQUIREMENTS, SPECIALTIES AND
3 TRAINING.

4 Q. IT SAYS: EACH AGENCY HAS SLIGHTLY DIFFERENT
5 REQUIREMENTS, SPECIALTIES AND TRAINING PROGRAMS,
6 CORRECT?

7 A. CORRECT.

8 Q. AGENCIES ARE ALLOWED TO HAVE DIFFERENT
9 REQUIREMENTS, CORRECT?

10 A. THEY MAY ONLY HAVE SPECIAL REQUIREMENTS AS IT
11 RELATES TO MEDICAL AND SPECIALIZED BEHAVIORAL HEALTH.

12 Q. IT DOESN'T SAY THAT ON YOUR WEBSITE, DOES IT?

13 A. THIS IS MEANT TO PROVIDE GENERAL INFORMATION AND
14 DOES NOT GO INTO INDIVIDUAL REGS OF ALL OF THE
15 SPECIALIZATIONS.

16 Q. IS THERE SOMEPLACE ELSE THAT TELLS AGENCIES THAT
17 THOSE ARE THE ONLY DIFFERENT REQUIREMENTS THEY ARE
18 ALLOWED TO HAVE?

19 A. NOT THAT I CAN RECALL RIGHT NOW.

20 Q. I BELIEVE YOU TESTIFIED YESTERDAY AND SOME THIS
21 MORNING THAT YOU ARE FAMILIAR WITH DHS'S CONTRACTS?

22 A. I AM.

23 Q. AND YOU ARE FAMILIAR WITH THE CONTRACT UNDER
24 WHICH CATHOLIC PROVIDES FOSTER CARE SERVICES?

25 A. I AM.

1 Q. IS IT YOUR RESPONSIBILITY TO ENSURE THAT THAT
2 CONTRACT IS ENFORCED?

3 A. THAT IS CORRECT.

4 Q. AND THAT AGENCIES ARE COMPLYING WITH THEIR
5 CONTRACTUAL OBLIGATIONS?

6 A. THAT'S CORRECT.

7 Q. IN FACT, YOU SIGNED THE AGREEMENT?

8 A. I DID SIGN THE AGREEMENT.

9 Q. I BELIEVE YOU TESTIFIED YESTERDAY AND AGAIN SOME
10 THIS MORNING ABOUT THE REASON YOU INSTITUTED A REFERRAL
11 FREEZE?

12 A. AN INTAKE CLOSURE.

13 Q. INTAKE CLOSURE. THANK YOU. AN INTAKE CLOSURE.

14 DID YOU DO THAT BECAUSE YOU THOUGHT
15 CATHOLIC WAS IN VIOLATION OF ITS CONTRACT?

16 A. I BELIEVE SO, YES.

17 Q. WHAT PORTION OF THE CONTRACT WAS CATHOLIC IN
18 VIOLATION OF, IN YOUR OPINION?

19 A. AFTER DISCUSSING WITH OUR LAW DEPARTMENT IT WAS
20 CLEAR THE FAIR PRACTICES ORDINANCE AS WELL AS THE
21 SERVICES PROVISION OF THEIR CONTRACT.

22 Q. I HAVE GOT TWO THERE. FAIR PRACTICES
23 ORDINANCES?

24 A. UM-HUM.

25 Q. AND THE OTHER ONE YOU SAID WAS --

1 A. IS SERVICES, THE DEFINITION OF SERVICES.

2 Q. CAN YOU START WITH SERVICES AND TELL ME HOW, AS
3 YOU UNDERSTAND IT, CATHOLIC WAS IN VIOLATION OF THE
4 SERVICES PROVISION OF THE CONTRACT?

5 A. SO THE TOTALITY OF THE CONTRACT UNDER SERVICES
6 REQUIRES THAT YOU TRAIN, RECRUIT AND CERTIFY FOSTER CARE
7 HOMES. THE INABILITY TO DELIVER A PART OF THAT SERVICE
8 WOULD NOT ALLOW YOU TO DO THE ENTIRETY OF YOUR CONTRACT.

9 Q. DOES THE SERVICES PROVISION SAY YOU MUST TRAIN,
10 RECRUIT AND CERTIFY ALL FAMILIES?

11 MR. FIELD: OBJECTION, YOUR HONOR. THIS
12 IS AN 80-PAGE CONTRACT AND HE IS ASKING ABOUT A
13 PARTICULAR PROVISION WITHIN IT.

14 THE COURT: OVERRULED. SHE CAN ANSWER.

15 THE WITNESS: CAN YOU REPEAT YOUR
16 QUESTION.

17 BY MR. RIENZI:

18 Q. SURE. DOES THE SERVICES PART OF THE CONTRACT
19 REQUIRE -- STRIKE THAT.

20 DOES THE SERVICES PART OF THE CONTRACT
21 TELL AGENCIES THAT THEY MUST RECRUIT AND CERTIFY ALL
22 FAMILIES?

23 A. I DON'T HAVE IT IN FRONT OF ME. I COULD NOT
24 WITHOUT --

25 Q. SURE. THAT'S UNDERSTANDABLE. I AGREE IT'S

1 LONG.

2 GIVE ME A SECOND, PLEASE.

3 MR. RIENZI: PERMISSION TO APPROACH, YOUR
4 HONOR.

5 THE COURT: YES.

6 BY MR. RIENZI:

7 Q. I AM HANDING THE WITNESS WHAT HAS BEEN LABELED
8 PLAINTIFF'S EXHIBIT 15. CAN YOU TELL ME IF YOU
9 RECOGNIZE THAT, PLEASE?

10 A. I DO RECOGNIZE THIS.

11 Q. WHAT IS THAT DOCUMENT?

12 A. THIS IS THE CONFORMED STANDARD AMENDMENT
13 AGREEMENT FOR CATHOLIC SOCIAL SERVICES.

14 Q. OKAY. AND THIS IS THE AGREEMENT UNDER WHICH
15 CATHOLIC PROVIDES FOSTER CARE SERVICES?

16 A. YES. IN THIS PARTICULAR CONTRACT THERE'S A
17 NUMBER OF OTHER PLACEMENT SERVICES ALSO IN HERE SO....

18 Q. AND YOU SIGNED THIS CONTRACT, CORRECT?

19 A. I DID. I BELIEVE MY SIGNATURE IS ON ONE OF
20 THESE PAGES.

21 Q. CAN YOU DIRECT --

22 A. PAGE 5.

23 Q. TERRIFIC. THANK YOU.

24 CAN YOU DIRECT ME TO THE SERVICES PORTION
25 OF THE CONTRACT THAT YOU WERE TELLING ME YOU BELIEVE

1 CATHOLIC HAS VIOLATED?

2 MR. FIELD: OBJECTION, CALLS FOR A LEGAL
3 CONCLUSION.

4 THE WITNESS: I WOULD HAVE TO HAVE A
5 MOMENT TO BE ABLE TO GO THROUGH THIS ENTIRE DOCUMENT TO
6 FIND THE SECTIONS I AM REFERENCING.

7 THE COURT: I DON'T KNOW THAT YOU CAN
8 ANSWER LIKE THAT.

9 THE WITNESS: BECAUSE SERVICES ARE
10 REFERENCED IN MULTIPLE PARTS OF THE CONTRACT. IT'S NOT
11 JUST IN ONE AREA. SO THERE IS THE GENERAL PROVISIONS.
12 THERE'S THE SCOPE OF SERVICES AND THERE'S THE
13 DEFINITIONS AND TERMS AS IT RELATES TO SERVICES.
14 BY MR. RIENZI:

15 Q. OKAY. IS IT YOUR VIEW THAT THAT CONTRACT
16 REQUIRES FOSTER AGENCIES TO RECRUIT AND CERTIFY ALL
17 COUPLES?

18 A. YES.

19 Q. ARE AGENCIES ALLOWED TO HAVE TARGETED
20 RECRUITING?

21 A. FOR SPECIALIZED BEHAVIORAL HEALTH AND AS WELL AS
22 FOR MEDICALLY FRAGILE CHILDREN.

23 Q. BEYOND THOSE TWO, IS IT A VIOLATION OF THE
24 CONTRACT THAT AGENCIES HAVE SPECIALIZED RECRUITING?

25 MR. FIELD: OBJECTION, CALLS FOR A LEGAL

1 CONCLUSION.

2 THE COURT: WHAT DO YOU MEAN BY
3 SPECIALIZED RECRUITING?

4 MR. RIENZI: TARGETED RECRUITING TO
5 PARTICULAR COMMUNITIES.

6 MR. FIELD: SAME OBJECTION, YOUR HONOR.

7 THE COURT: OVERRULED.

8 THE WITNESS: COULD YOU DEFINE WHAT YOU
9 MEAN.

10 BY MR. RIENZI:

11 Q. MUST ALL AGENCIES RECRUIT EVERYBODY ALL THE TIME
12 OR ARE THEY ALLOWED TO TARGET PARTICULAR COMMUNITIES TO
13 DO THEIR RECRUITING?

14 A. SO THEY CAN HAVE A FOCUS ON A CULTURAL OR
15 PARTICULAR COMMUNITY, BUT THEY REQUIRE -- ALL FOSTER
16 CARE AGENCIES ARE REQUIRED TO SERVE ALL MEMBERS OF THE
17 CITY OF PHILADELPHIA WHO PRESENT AND ARE INTERESTED IN
18 BECOMING A FOSTER PARENT.

19 Q. SO THEY ARE ALLOWED TO RECRUIT IN A TARGETED
20 WAY, IS THAT TRUE?

21 A. NO.

22 Q. SO CONCILIO TARGETS ITS RECRUITING TO THE LATINO
23 COMMUNITY, CORRECT?

24 A. I WOULD NOT CONFUSE SERVING A PARTICULAR
25 COMMUNITY WITH ONLY TARGETING.

1 Q. YOU DON'T THINK CONCILIO'S RECRUITING IS
2 TARGETED TO THE HISPANIC COMMUNITY?

3 A. I KNOW FOR A FACT THAT CONCILIO SERVES ALL OF
4 PHILADELPHIA.

5 Q. THAT WAS NOT MY QUESTION. MY QUESTION IS THEIR
6 RECRUITING EFFORTS ARE TARGETED TO THE HISPANIC
7 COMMUNITY, ARE THEY NOT?

8 MR. FIELD: OBJECTION TO THE TERM
9 "TARGETED," YOUR HONOR.

10 THE COURT: WHAT DO YOU MEAN BY
11 "TARGETED"?

12 MR. RIENZI: I MEAN DO THEY GO OUT TO
13 RECRUIT IN PARTICULAR COMMUNITIES? DO THEY SET OUT TO
14 RECRUIT FOSTER PARENTS IN HISPANIC COMMUNITIES?

15 THE COURT: I BELIEVE THE ANSWER WAS THEY
16 GO OUT, BUT THEY ARE OBLIGED TO SERVE THE ENTIRE
17 COMMUNITY.

18 MR. RIENZI: I DON'T THINK SHE ANSWERED
19 THE FIRST PART AS TO WHETHER THEY DO THE RECRUITING IN A
20 TARGETED WAY, WHICH IS WHAT I AM TRYING TO GET AT.

21 THE COURT: WELL, I THINK YOU NEED TO
22 REPHRASE YOUR QUESTION.

23 BY MR. RIENZI:

24 Q. CONCILIO FOCUSES ITS RECRUITING EFFORTS IN THE
25 HISPANIC COMMUNITY, DOESN'T IT?

1 A. I DON'T THINK I CAN ANSWER THE QUESTION.

2 Q. YOU DON'T KNOW EITHER WAY?

3 A. I SAID EARLIER THAT TARGETED DOES NOT EXCLUDE
4 THE ENTIRE COMMUNITY.

5 Q. YOU DON'T KNOW EITHER WAY WHETHER THEY TARGET A
6 PARTICULAR COMMUNITY, CORRECT?

7 MR. FIELD: OBJECTION TO THE TERM
8 "TARGETED," YOUR HONOR.

9 THE COURT: AGAIN --

10 BY MR. RIENZI:

11 Q. FOCUS ON A PARTICULAR COMMUNITY.

12 THE COURT: SHE HAS ANSWERED THE QUESTION
13 AS BEST AS SHE CAN USING HER TERMINOLOGY.

14 BY MR. RIENZI:

15 Q. YOU SAID YOU ALSO THINK CATHOLIC VIOLATED THE
16 FAIR PRACTICES ORDINANCE PORTION OF THE CONTRACT?

17 A. YES, THAT IS CORRECT.

18 Q. WHY DO YOU THINK THAT?

19 A. THAT -- ACTUALLY I AM NOT AN ATTORNEY SO THAT
20 WAS A DISCUSSION THAT WE HAD WITH OUR LEGAL COUNSEL IN
21 TERMS OF THEIR CONCLUSIONS AS IT RELATES TO THE
22 REPRESENTATION OF NOT SERVING SAME-SEX COUPLES.

23 MR. FIELD: YOUR HONOR, I JUST WANT TO
24 OBJECT TO ANY INQUIRY INTO PRIVILEGED AND CONFIDENTIAL
25 ATTORNEY/CLIENT INFORMATION.

1 THE COURT: YES.

2 BY MR. RIENZI:

3 Q. DO YOU THINK FOSTER CARE WORK IS A PUBLIC
4 ACCOMMODATION?

5 MR. FIELD: OBJECTION, CALLS FOR A LEGAL
6 CONCLUSION.

7 THE COURT: YES. SUSTAINED.

8 BY MR. RIENZI:

9 Q. DO YOU THINK THE FAIR PRACTICE ORDINANCE APPLIES
10 TO THE WORK OF THE DEPARTMENT OF HUMAN SERVICES DOING
11 FOSTER CARE WORK?

12 MR. FIELD: OBJECTION, CALLS FOR A LEGAL
13 CONCLUSION.

14 THE COURT: ASK YOUR QUESTION AGAIN.

15 BY MR. RIENZI:

16 Q. DO YOU THINK THE FAIR PRACTICES ORDINANCE
17 APPLIES TO THE WORK OF THE DEPARTMENT OF HUMAN SERVICES
18 DOING FOSTER CARE WORK.

19 THE COURT: AND WAS THERE AN OBJECTION?

20 MR. FIELD: CALLS FOR A LEGAL CONCLUSION,
21 YOUR HONOR.

22 THE COURT: SUSTAINED.

23 MR. RIENZI: YOUR HONOR, THE WITNESS HAS
24 TESTIFIED THAT SHE IS IN CHARGE FOR THE DEPARTMENT OF
25 ENSURING THAT THEY COMPLY WITH THE LAW.

1 THE COURT: I UNDERSTAND THAT, BUT WHAT
2 SHE SAID WAS SHE HAD TO HAVE A CONVERSATION WITH HER
3 COUNSEL -- LEGAL COUNSEL IN ORDER TO FIND OUT EXACTLY
4 WHAT --

5 MR. RIENZI: UNDERSTOOD.

6 BY MR. RIENZI:

7 Q. COMMISSIONER FIGUEROA, YOUR DISCUSSION WITH THE
8 LEGAL COUNSEL, WHICH I AM NOT GOING TO ASK THE SUBSTANCE
9 OF AT ALL, BUT YOUR DISCUSSION WITH LEGAL COUNSEL WAS
10 ABOUT WHETHER CATHOLIC HAD VIOLATED THE CONTRACT AND
11 SPECIFICALLY THE FAIR PRACTICES ORDINANCE PORTION OF THE
12 CONTRACT, CORRECT?

13 MR. FIELD: OBJECTION. SHE'S ALREADY
14 TESTIFIED TO THE FACT --

15 THE COURT: OVERRULED.

16 THE WITNESS: I'M SORRY. CAN YOU REPEAT
17 YOUR QUESTION.

18 BY MR. RIENZI:

19 Q. ALL I AM TRYING TO DO IS JUST BE CLEAR ABOUT
20 WHAT YOUR DISCUSSION WITH COUNSEL WAS AND I AM NOT
21 ASKING FOR THE SUBSTANCE OF IT. THAT WAS ABOUT WHETHER
22 CATHOLIC HAD VIOLATED THE FAIR PRACTICE ORDINANCE
23 PORTION OF THE CONTRACT, CORRECT?

24 A. NO. MY DISCUSSION WITH MY LAW DEPARTMENT WAS,
25 HERE ARE THE ISSUES, AND I AM CONCERNED ABOUT THEIR

1 ABILITY TO COMPLY WITH THE ENTIRETY OF THEIR CONTRACT.

2 Q. AND FOR MY NEXT QUESTION, I WANT YOU TO LEAVE
3 THAT DISCUSSION ASIDE BECAUSE I AM NOT ASKING ABOUT THAT
4 DISCUSSION. I AM ASKING YOU ABOUT YOUR JOB AS THE
5 PERSON IN CHARGE OF DHS, AND I AM ASKING ABOUT YOUR JOB
6 PARTICULARLY AS SOMEBODY WHO HAS TESTIFIED THAT IT IS
7 YOUR RESPONSIBILITY TO ENSURE THAT YOUR AGENCY COMPLIES
8 WITH STATE, FEDERAL AND CITY LAW.

9 A. THAT IS CORRECT.

10 Q. IS IT YOUR OPINION THAT DHS IS GOVERNED BY THE
11 FAIR PRACTICES ORDINANCE WHEN DOING FOSTER CARE WORK?

12 A. COULD YOU RESTATE YOUR QUESTION.

13 Q. IS IT YOUR OPINION THAT DHS, THE AGENCY YOU RUN,
14 IS COVERED BY THE FAIR PRACTICES ORDINANCE WHEN DOING
15 FOSTER CARE WORK?

16 MR. FIELD: OBJECTION TO THE EXTENT IT
17 CALLS FOR A LEGAL CONCLUSION OR INFORMATION LEARNED FROM
18 COUNSEL.

19 THE COURT: OVERRULED. IF YOU CAN
20 ANSWER.

21 THE WITNESS: I DON'T FEEL I HAVE LEGAL
22 TRAINING TO ANSWER THAT QUESTION.

23 BY MR. RIENZI:

24 Q. HAVE YOU EVER TRAINED YOUR STAFF ON COMPLIANCE
25 WITH THE FAIR PRACTICES ORDINANCE?

1 A. AS A COMMISSIONER?

2 Q. YES.

3 A. NO, I HAVE NOT.

4 Q. IN YOUR PRIOR TERM AT DHS HAVE YOU EVER TRAINED
5 YOUR STAFF ON COMPLIANCE WITH THE FAIR PRACTICES
6 ORDINANCE?

7 A. AS A DEPUTY COMMISSIONER, NO.

8 Q. IN ANY CONTEXT AT DHS HAVE YOU EVER TRAINED
9 STAFF ON THAT ISSUE?

10 MR. FIELD: YOU MEAN -- YOUR HONOR, CAN
11 WE JUST FIND OUT WHETHER HE MEANS HER PERSONALLY OR HER
12 DEPARTMENT?

13 THE COURT: HER PERSONALLY.

14 BY MR. RIENZI:

15 Q. I WILL START WITH YOU PERSONALLY.

16 A. I'M SORRY. I AM CONFUSED. CAN YOU START OVER
17 AGAIN.

18 Q. SURE. AND I WILL BACK UP. I APOLOGIZE.

19 WHAT I AM TRYING TO GET A SENSE OF IS
20 WHETHER WHILE YOU ARE AT DHS YOU ALL ARE ACTING LIKE YOU
21 ARE COVERED BY THE FAIR PRACTICES ORDINANCE. SO MY
22 QUESTION IS -- I WILL START WITH NOW AS COMMISSIONER.
23 AS COMMISSIONER, HAVE YOU DONE ANYTHING TO MAKE SURE
24 THAT PEOPLE AT DHS FOLLOW THE FAIR PRACTICES ORDINANCE
25 WHEN DOING FOSTER CARE WORK?

1 A. NOT TO MY RECOLLECTION.

2 Q. AND IN ALL OF YOUR TIME AT DHS, NOW OVER THE
3 COUPLE OF DIFFERENT STINTS THAT YOU HAVE HAD, DO YOU
4 RECALL ANY DISCUSSIONS WITH ANYBODY ABOUT WHETHER DHS
5 WAS COVERED BY THE FAIR PRACTICES ORDINANCE WHEN DOING
6 FOSTER CARE WORK?

7 A. I ANSWERED THAT IT WAS WITH OUR LEGAL COUNSEL.

8 Q. YES. I WANT YOU TO LEAVE ASIDE THAT DISCUSSION.
9 OTHER THAN THAT, ARE YOU AWARE OF ANY OTHER DISCUSSION
10 ABOUT WHETHER DHS IS COVERED BY THE FAIR PRACTICES
11 ORDINANCE WHEN DOING FOSTER CARE WORK?

12 A. I HAVE NOT HAD A REASON TO.

13 Q. DHS SOMETIMES CONSIDERS RACE WHEN MAKING A
14 FOSTER CARE PLACEMENT?

15 A. NO.

16 Q. DHS NEVER CONSIDERS A REQUEST FROM A PARENT TO
17 FOSTER A CHILD OF A PARTICULAR RACE WHEN PLACING
18 CHILDREN?

19 A. THAT WOULD BE THE PARENT'S CHOICE AND
20 PERSPECTIVE TO GIVE THAT REQUEST.

21 Q. AND WHEN DHS IS MEETING THAT PARENT'S CHOICE, IT
22 DOES CONSIDER RACE WHEN MAKING FOSTER CHILD PLACEMENTS?

23 A. WE CAN'T ALWAYS OFFER THE ABILITY TO PROVIDE THE
24 CONSIDERATION THAT HAS BEEN PRESENTED BY THE PARENT.

25 Q. UNDERSTOOD, BUT SOMETIMES YOU DO, CORRECT?

1 A. NO, I CAN'T ANSWER THAT.

2 Q. YOU CAN'T ANSWER IT OR YOU DON'T DO IT?

3 I WILL BREAK IT APART. ARE YOU SAYING
4 THAT DHS NEVER CONSIDERS THE RACE OF A CHILD WHEN MAKING
5 A PLACEMENT?

6 A. I AM SAYING THAT WE CONSIDER THE REQUEST OF THE
7 RESOURCE PARENT AND THAT THE OTHER FACTOR THAT WE HAVE
8 TO CONSIDER IS THE BEST INTEREST OF THE CHILD. WHETHER
9 THE BEHAVIOR IS -- COINCIDES WITH THE ENVIRONMENT IN THE
10 HOUSEHOLD, WHETHER OR NOT THERE CAN BE NO OTHER CHILD IN
11 THE HOME, WHETHER OR NOT THE CHILD IS MEDICALLY FRAGILE.
12 SO THERE ARE A LOT OF CONSIDERATIONS AND THEY ARE ALL
13 DRIVEN BY SAFETY.

14 Q. I AM TRYING TO GET YOU TO FOCUS ON RACE.

15 A. RIGHT. AND I AM TELLING YOU THE PRIORITY OF THE
16 DEPARTMENT --

17 Q. I UNDERSTAND THAT. I AM ASKING --

18 A. -- IS CHILDREN'S SAFETY.

19 Q. I UNDERSTAND THAT. BUT I AM ASKING YOU A
20 QUESTION ABOUT WHETHER THE DEPARTMENT EVER CONSIDERS
21 RACE WHEN MAKING A PLACEMENT.

22 THE COURT: WHEN YOU SAY "CONSIDER," DO
23 YOU MEAN THAT'S ONE OF THE FACTORS OR ONE OF MANY
24 FACTORS?

25 BY MR. RIENZI:

1 Q. YES, JUST CONSIDER IT AS ONE OF THE FACTORS. SO
2 YOU CONSIDER RACE WHEN MAKING PLACEMENTS SOMETIMES?

3 A. THERE'S NO FORMALIZED WAY FOR US TO DO THAT.

4 Q. DO YOU DO IT?

5 A. I DON'T KNOW THAT I CAN ANSWER THAT.

6 Q. YOU DON'T KNOW WHETHER YOUR DEPARTMENT EVER
7 CONSIDERS RACE IN MAKING A FOSTER CHILD PLACEMENT? IS
8 THAT YOUR TESTIMONY?

9 MR. FIELD: ASKED AND ANSWERED, YOUR
10 HONOR.

11 MR. RIENZI: YOUR HONOR, WITH ALL DUE
12 RESPECT, IT'S NOT ACTUALLY BEEN ANSWERED. I AM TRYING
13 TO GET TO THE ANSWER.

14 THE COURT: OVERRULED.

15 THE WITNESS: CAN YOU REPEAT IT.

16 BY MR. RIENZI:

17 Q. SURE. IS IT YOUR TESTIMONY THAT THE DEPARTMENT
18 OF HUMAN SERVICES NEVER CONSIDERS RACE WHEN MAKING A
19 CHILD PLACEMENT?

20 A. I'M SORRY. IT SOUNDS LIKE YOU'RE USING A DOUBLE
21 NEGATIVE. CAN YOU ASK IT MORE DIRECTLY.

22 Q. SURE. DOES THE DEPARTMENT OF HUMAN SERVICES
23 EVER CONSIDER RACE WHEN MAKING A FOSTER CARE PLACEMENT?

24 A. I THINK WHAT I HAVE ANSWERED BEFORE, AS ONE OF
25 THE MANY FACTORS THAT, YES.

1 Q. SO YES, IT DOES, BUT THERE ARE OTHER FACTORS
2 ALSO CONSIDERED?

3 A. THAT'S CORRECT.

4 Q. HAVE YOU EVER HAD ANY DISCUSSIONS WITH ANYBODY
5 AS TO WHETHER YOU ARE VIOLATING FAIR PRACTICES ORDINANCE
6 TO CONSIDER RACE IN A PUBLIC ACCOMMODATION?

7 A. IT HAS NOT COME TO MY ATTENTION.

8 MR. FIELD: ASSUMES FACTS NOT IN THE
9 RECORD, YOUR HONOR.

10 BY MR. RIENZI:

11 Q. DOES DHS SOMETIMES CONSIDER DISABILITY WHEN
12 MAKING CHILD PLACEMENTS IN FOSTER CARE?

13 A. ABSOLUTELY.

14 Q. HAVE YOU EVER CONSIDERED WHETHER YOU ARE
15 VIOLATING THE FAIR PRACTICES ORDINANCE IF FOSTER CARE IS
16 A PUBLIC ACCOMMODATION?

17 A. WE ACTUALLY HAVE SPECIALIZED PROVIDERS --

18 MR. FIELD: OBJECTION.

19 THE WITNESS: -- THAT ONLY WORK WITH THE
20 POPULATION YOU HAVE ADDRESSED.

21 THE COURT: OVERRULED.

22 BY MR. RIENZI:

23 Q. AND THAT WOULD BE A VIOLATION OF THE FAIR
24 PRACTICES ORDINANCE IF FOSTER CARE WERE A PUBLIC
25 ACCOMMODATION, WOULDN'T IT?

1 MR. FIELD: OBJECTION, CALLS FOR A LEGAL
2 CONCLUSION, YOUR HONOR.

3 THE COURT: SUSTAINED.

4 BY MR. RIENZI:

5 Q. YOU KNOW THAT SOMETIMES FOSTER AGENCIES
6 THEMSELVES CONSIDER RACE WHEN MAKING FOSTER CARE
7 PLACEMENTS?

8 A. I CAN'T ANSWER THAT. I DON'T KNOW.

9 Q. YOU DON'T KNOW WHETHER ANY AGENCIES CONSIDER
10 RACE WHEN MAKING PLACEMENTS?

11 A. I HAVE NEVER HAD THAT DISCUSSION --

12 MR. FIELD: ASSUMES FACTS NOT IN THE
13 RECORD REGARDING PLACEMENTS, YOUR HONOR.

14 MR. RIENZI: IT'S A QUESTION ABOUT
15 WHETHER IT HAPPENS.

16 MR. FIELD: THE WITNESS HAS NOT TESTIFIED
17 AS TO WHETHER FOSTER CARE AGENCIES PROVIDE PLACEMENTS.

18 THE COURT: SHE ANSWERED.

19 BY MR. RIENZI:

20 Q. WHO AT DHS WOULD KNOW THAT?

21 THE COURT: WHO?

22 BY MR. RIENZI:

23 Q. WHO IN DHS WOULD KNOW WHETHER FOSTER AGENCIES
24 CONSIDER RACE IN MAKING PLACEMENTS?

25 THE COURT: WHAT DOES THAT HAVE TO DO

1 WITH THIS CASE?

2 MR. RIENZI: PLENTY, YOUR HONOR. THE
3 CLAIM IS THAT FOSTER CARE IS A PUBLIC ACCOMMODATION
4 SUBJECT TO THE FAIR PRACTICES ORDINANCE. THE
5 COMMISSIONER HAS JUST TOLD ME THAT THE DEPARTMENT
6 SOMETIMES CONSIDERS RACE WHEN MAKING PLACEMENTS.

7 THE COURT: AS ONE OF MANY OTHER FACTORS.

8 MR. RIENZI: WHICH WOULD BE A VIOLATION
9 OF THE FAIR PRACTICES ORDINANCE IF THEY ACTUALLY
10 BELIEVED IT.

11 THE COURT: THAT IS YOUR OPINION.

12 MR. RIENZI: CORRECT. AND IT'S ACTUALLY
13 ALSO THE FAIR PRACTICES ORDINANCE, YOUR HONOR. I AM
14 SIMPLY TRYING TO GET A SENSE OF HOW THEY RUN THEIR
15 FOSTER CARE PROGRAM AND WHETHER THEY ALLOW OTHER
16 CONSIDERATIONS THAT ARE NOT CONSISTENT WITH THIS
17 APPARENTLY NEW VIEW THAT FOSTER CARE IS A PUBLIC
18 ACCOMMODATION. SO I AM TRYING TO FIND OUT HOW THE
19 DEPARTMENT HANDLES OTHER THINGS THAT IF THEIR STORY WERE
20 ACTUALLY CORRECT WOULD BE VIOLATIONS OF THE FAIR
21 PRACTICES ORDINANCE.

22 THE COURT: WELL, THAT IS NOT -- THE FACT
23 THAT YOU CONSIDER A PUBLIC ACCOMMODATION AND WHAT IS
24 REQUIRED BY THE FAIR PRACTICES ACT IS NOT WHAT THIS CASE
25 IS BASED ON, THE ISSUE OF RACE.

1 MR. RIENZI: YOUR HONOR, SHE TESTIFIED
2 THAT THE VIOLATION -- WAS VIOLATION OF THE FAIR
3 PRACTICES ORDINANCE BECAUSE IT'S THEIR VIEW THAT FOSTER
4 CARE IS A PUBLIC ACCOMMODATION COVERED BY THE FAIR
5 PRACTICES ORDINANCE.

6 THE COURT: SHE HAS NOT TESTIFIED TO
7 THAT.

8 MR. RIENZI: SHE HAS TESTIFIED THAT THAT
9 WAS ONE OF THE TWO BREACHES OF THE FAIR PRACTICES
10 ORDINANCE, IS MY UNDERSTANDING.

11 MR. FIELD: SHE TESTIFIED REGARDING
12 INFORMATION PROVIDING BY HER COUNSEL, YOUR HONOR.

13 THE COURT: THAT IS CORRECT. SHE HAS NOT
14 TESTIFIED TO THAT.

15 BY MR. RIENZI:

16 Q. MS. FIGUEROA, DID YOU TELL OTHER PEOPLE THAT
17 CATHOLIC HAD VIOLATED THE FAIR PRACTICES ORDINANCES PART
18 OF THAT CONTRACT?

19 MR. FIELD: YOUR HONOR, I JUST OBJECT TO
20 THE EXTENT THAT THE QUESTION REQUIRES --

21 THE COURT: SUSTAINED. SUSTAINED.

22 BY MR. RIENZI:

23 Q. COMMISSIONER FIGUEROA, I AM NOT ASKING YOU TO
24 TELL ME ANYTHING ABOUT ANY CONVERSATIONS YOU HAD WITH
25 YOUR LAWYERS.

1 MR. FIELD: OR OTHER CITY EMPLOYEES, YOUR
2 HONOR.

3 THE COURT: I SUSTAINED THE OBJECTION.
4 BY MR. RIENZI:

5 Q. DID YOU TALK TO ANYBODY WHO DOES NOT WORK FOR
6 THE CITY AND TELL THEM THAT YOU THOUGHT CATHOLIC HAD
7 VIOLATED THE FAIR PRACTICES ORDINANCE?

8 A. NO.

9 Q. YOU DIDN'T TELL THAT TO CATHOLIC?

10 A. IN OUR -- ACTUALLY IT WAS OUR LEGAL COUNSEL THAT
11 SPOKE TO THEIR LEGAL COUNSEL IN THE MEETING. THE DIRECT
12 QUESTION CAME FROM CATHOLIC SOCIAL SERVICES COUNSEL AND
13 OUR COUNSEL PRESENT RESPONDED.

14 Q. HAVE YOU EVER INSTRUCTED ANYBODY AT DHS TO
15 FREEZE REFERRALS AT ANY AGENCY OVER A VIOLATION OF THE
16 FAIR PRACTICES ORDINANCE?

17 A. CATHOLIC SOCIAL SERVICES.

18 Q. OTHER THAN CATHOLIC SOCIAL SERVICES?

19 A. NO.

20 Q. HAVE YOU EVER INFORMED THE 30 FOSTER CARE
21 AGENCIES IN THE CITY THAT YOU BELIEVE THEIR PROVISION OF
22 FOSTER CARE IS GOVERNED BY THE FAIR PRACTICES ORDINANCE?

23 A. IT'S IN THE CONTRACT.

24 Q. OTHER THAN THE LANGUAGE IN THE CONTRACT, HAVE
25 YOU EVER INFORMED THE AGENCIES IN THE CITY THAT YOU

1 THINK THEY HAVE OBLIGATIONS UNDER THE FAIR PRACTICES
2 ORDINANCE WHEN DOING FOSTER CARE WORK?

3 A. WE ALWAYS REMIND INDIVIDUALS TO MEET THE
4 STANDARDS IN THEIR CONTRACTS.

5 Q. I AM SAYING OTHER THAN THE CONTRACT, HAVE YOU
6 EVER TOLD AGENCIES TO DO THAT?

7 A. BASED ON THE NATURE OF THE CONTRACT DISCUSSIONS,
8 THEN I WOULD SAY YES BECAUSE THEY ALL SIGN THEIR
9 CONTRACTS AS I DID.

10 Q. I AM JUST ASKING YOU, OTHER THAN THE CONTRACT,
11 DO YOU EVER TELL THEM THEY MUST FOLLOW THE FAIR
12 PRACTICES ORDINANCE?

13 A. NOT THAT I RECALL.

14 Q. YOU ARE NOT AWARE OF ANY TRAININGS THAT YOUR
15 AGENCY HAS DONE TO TELL PEOPLE THAT?

16 A. NOT THAT I AM AWARE OF.

17 Q. SO IN ALL OF YOUR TIME AT DHS THE FIRST TIME YOU
18 EVER HEARD ANYBODY SAY FOSTER CARE WAS A PUBLIC
19 ACCOMMODATION UNDER THE FAIR PRACTICES ORDINANCE WAS IN
20 THIS PARTICULAR DISPUTE, CORRECT?

21 A. AGAIN, THAT WAS IN CONVERSATION WITH MY COUNSEL.

22 Q. AND I AM ASKING YOU SINCE I KNOW YOU ALSO
23 OBSERVED NONPRIVILEGED CONVERSATIONS BETWEEN YOUR
24 COUNSEL AND CATHOLIC. SO I AM NOT ASKING YOU TO TELL ME
25 ANYTHING ABOUT WHAT YOUR LAWYER TOLD YOU. PRIOR TO

1 MARCH OF 2018, YOU HAD NEVER TAKEN THE POSITION THAT
2 FOSTER CARE WORK WAS A PUBLIC ACCOMMODATION UNDER THE
3 FAIR PRACTICES ORDINANCE, CORRECT?

4 MR. FIELD: OBJECTION TO THE
5 CHARACTERIZATION OF TAKING A POSITION, YOUR HONOR.

6 THE COURT: SUSTAINED.

7 BY MR. RIENZI:

8 Q. YOU ARE NOT AWARE OF DHS EVER TELLING ANYONE
9 THAT FOSTER CARE WAS A PUBLIC ACCOMMODATION PRIOR TO
10 2018, CORRECT?

11 A. WE NEVER NEEDED TO PRIOR.

12 Q. THAT'S NOT MY QUESTION. MY QUESTION IS WHETHER
13 YOU ARE AWARE OF ANYONE AT DHS EVER TAKING THAT POSITION
14 PRIOR TO 2018?

15 MR. FIELD: OBJECTION TO THE SCOPE OF
16 THIS, YOUR HONOR. SHE HAS ONLY BEEN THE COMMISSIONER
17 SINCE THE FALL OF 2016.

18 THE COURT: MY UNDERSTANDING IS IT'S IN
19 THE CONTRACT.

20 MR. RIENZI: I UNDERSTAND THAT THAT IS
21 THEIR CLAIM, YOUR HONOR, AND I'M SIMPLY SAYING IF YOU
22 ARE RUNNING A LARGE SYSTEM, I AM CURIOUS TO KNOW WHETHER
23 THEY SAID IT TO ANYBODY ELSE.

24 THE COURT: WHEN YOU SAY "SAID IT TO
25 ANYBODY ELSE," I MEAN THE FACT THAT IT'S LAID OUT IN THE

1 CONTRACT --

2 MR. RIENZI: YOUR HONOR, THE WORDS "FAIR
3 PRACTICES ORDINANCE" APPEAR IN THE CONTRACT. WE HAVE A
4 SERIOUS DISPUTE WITH THE CITY AS TO WHETHER THAT MAKES
5 FOSTER CARE A PUBLIC ACCOMMODATION.

6 THE COURT: I CAN APPRECIATE THAT. ALL I
7 AM SAYING IS, THE FACT THAT IT IS IN THE CONTRACT, I
8 DON'T KNOW THAT IT'S NECESSARY THAT IT HAS TO BE SAID
9 ANY OTHER WAY.

10 MR. RIENZI: YOUR HONOR, I THINK THAT'S A
11 PERFECTLY FAIR POSITION TO TAKE, AND MAYBE MS. FIGUEROA
12 IS GOING TO SAY THAT. BUT MY QUESTION IS JUST WHETHER
13 SHE IS AWARE OF ANYPLACE ELSE THAT THEY HAVE TAKEN THE
14 POSITION THAT FOSTER CARE IS A PUBLIC ACCOMMODATION.
15 SHE HAS BEEN THERE FOR MANY YEARS. IF THE ANSWER IS NO,
16 THEN THAT'S FINE. I BELIEVE THE ANSWER WAS --
17 BY MR. RIENZI:

18 Q. WAS YOUR ANSWER PREVIOUSLY IT HAS NOT COME UP
19 BEFORE? WAS THAT YOUR ANSWER?

20 MR. FIELD: AGAIN, YOUR HONOR, I JUST
21 OBJECT BECAUSE HE REFERRED AGAIN TO THIS
22 CHARACTERIZATION OF TAKING THE POSITION, WHICH IS A
23 LEGAL CONCLUSION.

24 BY MR. RIENZI:

25 Q. YOU HAVE WORKED AT DHS FOR A TOTAL --

1 A. WELL, IN MY CURRENT CAPACITY?

2 Q. TOTAL.

3 A. ALMOST FOUR YEARS.

4 Q. PRIOR TO 2018 YOU HAD NEVER HEARD ANYBODY AT DHS
5 SAY THAT FOSTER CARE WORK WAS A PUBLIC ACCOMMODATION,
6 CORRECT?

7 A. I BELIEVE I ANSWERED THIS.

8 Q. I AM ASKING FOR A YES OR NO ANSWER. PRIOR TO
9 2018, YOU HAD NEVER HEARD ANYBODY CALL FOSTER CARE A
10 PUBLIC ACCOMMODATION, CORRECT?

11 MR. FIELD: I OBJECT TO THE EXTENT IT
12 CALLS FOR A PRIVILEGED COMMUNICATION, YOUR HONOR.

13 THE COURT: OVERRULED. YOU MAY ANSWER.

14 THE WITNESS: I BELIEVE I ANSWERED THAT
15 PRIOR TO THIS INCIDENT IT HAD NOT AROSE.

16 BY MR. RIENZI:

17 Q. SO NO, YOU HAD NEVER HEARD THAT?

18 A. NO.

19 Q. OKAY. THANK YOU.

20 I BELIEVE YOU TESTIFIED ON TUESDAY THAT
21 YOU HAD HEARD AND AGREED WITH MS. ALI'S TESTIMONY, IS
22 THAT CORRECT?

23 A. THAT IS CORRECT.

24 Q. AND YOU KNOW THAT MS. ALI STATED A -- WHAT SHE
25 SAID WAS A RULE THAT IF A QUALIFIED PROSPECTIVE FOSTER

1 FAMILY WANTS A HOME STUDY PERFORMED BY A PARTICULAR
2 FOSTER AGENCY, THAT AGENCY MUST PROVIDE THE HOME STUDY.
3 DO YOU RECALL THAT?

4 MR. FIELD: OBJECTION. HE IS
5 MISCHARACTERIZING MS. ALI'S TESTIMONY.

6 THE COURT: OVERRULED.

7 BY MR. RIENZI:

8 Q. DO YOU RECALL MS. ALI TESTIFYING ABOUT A RULE
9 THAT IF A QUALIFIED PROSPECTIVE FOSTER FAMILY WANTS A
10 HOME STUDY PERFORMED BY A PARTICULAR AGENCY, THAT AGENCY
11 MUST PROVIDE THE HOME STUDY?

12 A. I HAVE -- IN TERMS OF RULES, IS THAT THE -- WAS
13 THAT THE LANGUAGE THAT MS. ALI USED?

14 THE COURT: I THINK SHE USED POLICY.

15 BY MR. RIENZI:

16 Q. POLICY. I'M NOT -- YOU CAN CALL IT WHATEVER YOU
17 LIKE. I'M LOOKING FOR --

18 A. I THINK LANGUAGE IS IMPORTANT.

19 Q. I DO TOO. THANK YOU.

20 DID YOU HEAR MS. ALI TESTIFY ABOUT THAT
21 POLICY?

22 A. I WAS HERE, YES. I HEARD HER TESTIFY ON THE
23 POLICY.

24 Q. DO YOU AGREE WITH HER TESTIMONY ON THAT POLICY?

25 A. YES, THAT PARENTS CHOOSE WHICH ORGANIZATION THEY

1 WOULD LIKE TO WORK WITH.

2 Q. AND THAT AN AGENCY MUST PROVIDE THE HOME STUDY
3 IF A FAMILY WANTS THE AGENCY TO PROVIDE THE HOME STUDY,
4 CORRECT?

5 A. YES.

6 Q. YOU HAVE NEVER DONE ANY TRAINING FOR AGENCIES
7 ABOUT THAT POLICY, HAVE YOU?

8 A. IN ALL SINCERITY, IT IS A HUGE DEPARTMENT AND A
9 LOT OF THE CHILD WELFARE OPERATIONS ARE UNDER MS. ALI,
10 SO I WOULD NOT BE ABLE TO ANSWER THE QUESTION.

11 Q. YOU ARE NOT AWARE OF ANY TRAINING PROVIDED TO
12 THE AGENCIES ABOUT THAT POLICY, CORRECT?

13 A. I JUST ANSWERED THAT, AGAIN, I OVERSEE A VERY
14 LARGE DEPARTMENT, AND THOSE DUTIES AND RESPONSIBILITIES,
15 I RELY ON THE SUPPORT OF DEPUTY COMMISSIONER ALI. SO
16 I'M NOT IN A POSITION TO BE ABLE TO ANSWER THAT.

17 Q. YOU CERTAINLY NEVER INSTRUCTED HER TO MAKE SURE
18 AGENCIES ARE TRAINED ON THAT POLICY, CORRECT?

19 A. WHAT POLICY?

20 Q. THE POLICY THAT FOSTER AGENCIES MUST PROVIDE
21 HOME STUDIES TO FAMILIES WHO WANT THEM. YOU HAVE NOT
22 INSTRUCTED HER TO MAKE SURE THAT AGENCIES ARE TRAINED ON
23 THAT POLICY, CORRECT?

24 A. THAT'S CORRECT.

25 Q. AND YOU HAVE DONE NOTHING TO TRAIN YOUR OWN

1 STAFF ON THAT POLICY, CORRECT?

2 A. ARE WE REFERRING TO THE POLICY OF THE HOME
3 STUDY?

4 Q. THE POLICY THAT AN AGENCY MUST PROVIDE A HOME
5 STUDY. YOU HAVE NEVER DONE ANYTHING TO TRAIN YOUR OWN
6 STAFF ON THAT POLICY, CORRECT?

7 A. NO, BECAUSE IT IS REFLECTED IN THE CONTRACT.

8 Q. OTHER THAN YOUR CLAIM THAT IT IS IN THAT
9 CONTRACT, HAVE YOU EVER SEEN THIS POLICY WRITTEN DOWN
10 ANYPLACE?

11 A. I'M SURE IT EXISTS IN A LOT OF DIFFERENT PLACES.
12 I DON'T KNOW THAT I CAN SAY -- YOU KNOW, THERE'S
13 REFERENCE TO THE WEBSITE, ET CETERA. SO I DON'T KNOW
14 THAT I COULD NAME OTHER PLACES IN WHICH THAT WOULD
15 APPEAR.

16 Q. OKAY. DO YOU KNOW THAT IT APPEARS IN OTHER
17 PLACES OR ARE YOU JUST SAYING IT MIGHT AND YOU DON'T
18 KNOW?

19 A. IT MIGHT AND I DON'T KNOW.

20 MR. RIENZI: PERMISSION TO APPROACH, YOUR
21 HONOR.

22 THE COURT: YES.

23 BY MR. RIENZI:

24 Q. I AM HANDING THE WITNESS A COPY OF A DOCUMENT
25 LABELED PLAINTIFF'S EXHIBIT 16. AND I ASK YOU IF YOU

1 HAVE SEEN THAT DOCUMENT BEFORE?

2 A. THERE'S A STICKER OVER PART OF IT, SO I AM
3 ASSUMING THAT SAYS THE DEPARTMENT OF HUMAN SERVICES.

4 Q. I WILL SHOW YOU A COPY WITHOUT THE EXHIBIT
5 STICKER, JUST SO YOU CAN SEE THAT. HAVE YOU SEEN THAT
6 BEFORE?

7 A. YES, THIS IS ACTUALLY VERY DATED.

8 Q. IT STILL APPEARS ON YOUR WEBSITE, CORRECT?

9 A. I DON'T KNOW.

10 Q. DHS.PHILA.GOV IS YOUR WEBSITE?

11 A. THAT'S CORRECT.

12 Q. DO YOU RECOGNIZE THIS DOCUMENT?

13 A. I AM FAMILIAR WITH THIS DOCUMENT.

14 Q. WHAT IS IT?

15 A. IT'S THE FOSTER PARENT HANDBOOK.

16 Q. AND WHAT IS THE FOSTER PARENT HANDBOOK?

17 A. IT'S A GUIDE FOR PROSPECTIVE PARENTS.

18 Q. I WOULD LIKE YOU TO TURN TO THE PINK STICKY
19 NOTE, WHICH IS ON PAGE 2, THE FREQUENTLY ASKED QUESTIONS
20 PAGE. DO YOU SEE THE SECTION SAYING: HOW DO I BECOME A
21 FOSTER PARENT?

22 A. YES.

23 Q. CAN YOU JUST TAKE A MOMENT AND -- WELL, I WOULD
24 LIKE TO DIRECT YOUR ATTENTION TO THE SECOND SENTENCE
25 THERE. IT SAYS: THERE ARE MANY FOSTER CARE AGENCIES IN

1 PHILADELPHIA THAT CAN HELP YOU THROUGH THIS PROCESS. DO
2 YOU SEE THAT?

3 A. THAT IS CORRECT.

4 Q. AND -- I APOLOGIZE. IT SAYS: THE FIRST STEP IS
5 TO BECOME LICENSED AS A FOSTER PARENT. THERE ARE MANY
6 FOSTER CARE AGENCIES IN PHILADELPHIA THAT CAN HELP YOU
7 THROUGH THIS PROCESS.

8 A. THAT'S CORRECT.

9 Q. AND THAT'S CORRECT. I MEAN, IT'S NOT JUST
10 CORRECT WHAT IT SAYS. YOU AGREE IT IS A FACTUAL MATTER,
11 CORRECT?

12 A. I AGREE, YES.

13 Q. THEN IT SAYS: DHS DOES NOT LICENSE OR APPROVE
14 FOSTER PARENTS, IS THAT CORRECT?

15 A. THAT IS CORRECT.

16 Q. IT'S NOT THE CITY'S JOB TO LICENSE OR APPROVE
17 FOSTER PARENTS?

18 A. PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES
19 LICENSES FOSTER PARENTS.

20 Q. IT SAYS: DHS DOES NOT LICENSE OR APPROVE FOSTER
21 PARENTS, BUT IS PROVIDING THIS HANDBOOK AS A GENERAL
22 GUIDE TO THE OVERALL PROCESS OF FOSTER PARENTING,
23 INCLUDING RIGHTS, RESPONSIBILITIES AND TIPS FOR SUCCESS.

24 IS THAT WHAT IT SAYS?

25 A. YEP.

1 Q. NOTHING IN THE HOW I -- HOW DO I BECOME A FOSTER
2 PARENT SECTION SAYS THAT FOSTER PARENTS HAVE A RIGHT TO
3 RECEIVE A HOME STUDY FROM WHATEVER AGENCY THEY PICK,
4 DOES IT?

5 A. NO, BUT I THINK IT'S IMPORTANT TO KNOW THAT THIS
6 IS A GENERAL GUIDE TO THE OVERALL PROCESS OF FOSTER
7 PARENTING.

8 Q. GREAT. AND THAT GENERAL GUIDE DOES NOT SAY YOU
9 HAVE A RIGHT TO A HOME STUDY FROM ANY AGENCY YOU WANT,
10 DOES IT?

11 A. BECAUSE IT'S A GENERAL GUIDE, IT MIGHT NOT
12 INCLUDE ALL THE DETAIL NECESSARY.

13 Q. IT DOES NOT INCLUDE THAT STATEMENT, CORRECT?

14 A. WHAT STATEMENT?

15 Q. THE STATEMENT THAT YOU HAVE A RIGHT TO A HOME
16 STUDY FROM WHATEVER AGENCY YOU PICK.

17 MR. FIELD: YOUR HONOR, I JUST OBJECT.
18 THE GENERAL GUIDE IS A --

19 THE COURT: OVERRULED.

20 MR. FIELD: -- MANY-PAGE DOCUMENT AND HE
21 IS ASKING ABOUT THE ENTIRETY OF IT.

22 MR. RIENZI: I AM NOT.

23 BY MR. RIENZI:

24 Q. I AM ASKING ABOUT THE "HOW DO I BECOME A FOSTER
25 PARENT" SECTION.

1 A. I DON'T KNOW WHAT ELSE THAT -- RIGHT NOW OFF THE
2 TOP OF MY HEAD IN THE 74-PAGE DOCUMENT THAT MIGHT BE
3 FOUND BESIDES PAGE 2. CAN YOU REPEAT THE STATEMENT YOU
4 ARE ASKING ME TO CONFIRM?

5 Q. THE "HOW DO I BECOME A FOSTER PARENT" SECTION
6 DOES NOT SAY THAT YOU HAVE A RIGHT TO GET A HOME STUDY
7 FROM WHATEVER AGENCY YOU WANT, DOES IT?

8 A. IN THIS GUIDE, IT DOES NOT.

9 Q. OKAY. IT SAYS: DHS DOES NOT LICENSE OR APPROVE
10 FOSTER PARENTS. WHO DOES?

11 A. THE PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES.

12 Q. SO PENNSYLVANIA DHS IS THE ONE WHO LICENSES AND
13 APPROVES FOSTER PARENTS?

14 A. THAT'S CORRECT.

15 Q. DO AGENCIES PLAY A ROLE IN THAT?

16 A. BASED ON THE INFORMATION THAT THEY PROVIDE IS
17 HOW A PARENT BECOMES LICENSED AND APPROVED.

18 Q. WHO DO THEY PROVIDE THAT INFORMATION TO?

19 A. YOU ARE GETTING INTO THE REAL TECHNICAL
20 OPERATIONAL PART, SO I WOULD HAVE TO RELY ON MY DEPUTY
21 COMMISSIONER TO ANSWER THAT.

22 Q. THEY DON'T PROVIDE IT TO YOU, DO THEY?

23 A. NO. THEY HAVE TO GO THROUGH THE STATE PROCESS.
24 YEP.

25 Q. AND YOU HAVE NOTHING TO DO WITH THAT PROCESS, DO

1 YOU?

2 A. NO.

3 Q. YOUR OFFICE DOES NOT REVIEW HOME STUDIES?

4 A. I CAN'T ANSWER THAT.

5 Q. I'M SORRY. YOU SAID YOU CAN'T ANSWER THAT?

6 A. I DON'T KNOW.

7 Q. WHEN AGENCIES DO HOME STUDIES, THEY ARE NOT
8 ACTING ON BEHALF OF THE CITY, ARE THEY?

9 MR. FIELD: OBJECTION, CALLS FOR A LEGAL
10 CONCLUSION.

11 THE COURT: OVERRULED.

12 THE WITNESS: THE CITY PAYS FOR THE
13 CONTRACT FOR THEM TO DELIVER THE SERVICE. THE LICENSING
14 COMPONENT IS HELD BY THE STATE. THEY CAN'T DO THE WORK
15 UNLESS THEY HAVE A CONTRACT WITH THE CITY OF
16 PHILADELPHIA.

17 BY MR. RIENZI:

18 Q. WHEN AGENCIES DO HOME STUDIES, THEY ARE NOT
19 ACTING ON BEHALF OF THE CITY, ARE THEY?

20 THE COURT: SHE ANSWERED THAT QUESTION.
21 WHEN YOU SAY ON BEHALF OF, IT'S NECESSARY FOR THEM TO
22 GET A LICENSE, BUT THEY CAN'T --

23 MR. RIENZI: I AM SIMPLY TRYING TO FIGURE
24 OUT IF THIS IS THE CITY'S WORK THAT THE AGENCIES ARE
25 DOING OR IF IT'S SOMEBODY ELSE'S WORK.

1 MR. FIELD: I BELIEVE SHE JUST ANSWERED
2 THAT QUESTION, YOUR HONOR.

3 THE COURT: SHE DID ANSWER THE QUESTION.

4 MR. RIENZI: OKAY.

5 BY MR. RIENZI:

6 Q. DO YOU STILL HAVE THE CONTRACT UP THERE?

7 A. I DO.

8 Q. TURN TO PAGE 86 OF THE CONTRACT, PLEASE.

9 A. I GOT IT.

10 Q. DO YOU SEE SECTION 9.1?

11 A. I DO.

12 Q. CAN YOU READ THE FIRST SENTENCE OF THAT SECTION
13 TO ME, PLEASE?

14 A. PROVIDER IS AN INDEPENDENT CONTRACTOR AND SHALL
15 NOT IN ANY WAY FOR ANY PURPOSES BE DEEMED OR INTENDED TO
16 BE AN EMPLOYEE OR AGENT OF THE CITY.

17 Q. AND THAT IS CORRECT AS YOUR UNDERSTANDING,
18 RIGHT?

19 MR. FIELD: OBJECTION TO THE EXTENT IT
20 CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

21 THE COURT: OVERRULED.

22 THE WITNESS: THAT'S CORRECT UNDER
23 ARTICLE 9, THE INDEPENDENT CONTRACTOR INDEMNIFICATION
24 LITIGATION COOPERATION.

25 BY MR. RIENZI:

1 Q. THANK YOU.

2 MR. RIENZI: PERMISSION TO APPROACH, YOUR
3 HONOR.

4 THE COURT: YES.

5 BY MR. RIENZI:

6 Q. HANDING THE WITNESS A DOCUMENT LABELED
7 PLAINTIFF'S EXHIBIT 17.

8 COMMISSIONER FIGUEROA, ACTUALLY IF I CAN
9 JUST TURN YOU BACK TO THE FOSTER PARENT HANDBOOK FOR ONE
10 MORE SECOND. IT IS THE PREVIOUS EXHIBIT. IN THE SECOND
11 PARAGRAPH THERE YOU SEE THAT THE CITY IS REFERRING
12 PEOPLE TO THE PENNSYLVANIA STATE FOSTER PARENT
13 ASSOCIATION?

14 A. ARE WE BACK TO THE ORIGINAL TAB?

15 Q. I'M SORRY. I AM BACK TO THE FOSTER PARENT
16 HANDBOOK.

17 A. YES. WHAT PAGE?

18 Q. SAME PAGE. PAGE 2, THE FREQUENTLY ASKED
19 QUESTIONS. DO YOU SEE THAT DHS IS REFERRING PEOPLE TO
20 THE PENNSYLVANIA STATE FOSTER PARENT ASSOCIATION?

21 A. HERE IN THE MIDDLE?

22 Q. SECOND PARAGRAPH?

23 A. YES. YEP.

24 Q. AND DHS SAYS THAT THAT ENTITY CAN ALSO GIVE YOU
25 MORE INFORMATION AND ASSIST YOU AS YOU DECIDE WHICH

1 AGENCY IS THE BEST MATCH FOR YOU TO WORK WITH FOR YOUR
2 HOME STUDY AND LICENSE. DO YOU SEE THAT?

3 A. I'M SORRY. WHERE ARE YOU READING FROM?

4 Q. THE SECOND PARAGRAPH ON PAGE 2?

5 A. YES.

6 Q. IT SAYS THAT THE PENNSYLVANIA STATE --

7 A. GOT IT. YES.

8 Q. -- FOSTER PARENT ASSOCIATION CAN ALSO GIVE YOU
9 MORE INFORMATION AND ASSIST YOU AS YOU DECIDE WHICH
10 AGENCY IS THE BEST MATCH FOR YOU TO WORK WITH FOR YOUR
11 HOME STUDY AND LICENSE. DO YOU SEE THAT?

12 A. YES.

13 Q. ARE YOU FAMILIAR WITH THEN THE NEXT DOCUMENT I
14 GAVE YOU, THE RESOURCE PARENT MANUAL?

15 A. I AM ACTUALLY NOT FAMILIAR WITH IT.

16 Q. OKAY. ARE YOU AWARE THAT THE PENNSYLVANIA STATE
17 FOSTER PARENT ASSOCIATION CHANGED ITS NAME TO THE
18 PENNSYLVANIA STATE RESOURCE FAMILY ASSOCIATION?

19 A. NO.

20 Q. I WOULD LIKE TO DIRECT YOUR ATTENTION TO PAGE 7
21 OF THAT RESOURCE PARENT MANUAL. IT SAYS: REQUIREMENTS
22 IN PENNSYLVANIA TO BE A RESOURCE PARENT.

23 A. YES.

24 Q. ARE YOU FAMILIAR WITH THE REGULATIONS THAT
25 APPEAR ON THAT PAGE?

1 A. I AM FAMILIAR WITH THEM. I WOULD NOT SAY I
2 COULD CITE THEM.

3 Q. THOSE ARE THE STATE REGULATIONS FOR AN AGENCY
4 APPROVING A FOSTER FAMILY, CORRECT?

5 A. YES, CORRECT.

6 Q. AND DO YOU SEE UNDER HEADING NUMBER 1 WHERE IT
7 SAYS: NOTE THAT THESE ARE MINIMUM REQUIREMENTS AND
8 INDIVIDUAL AGENCIES WILL VARY THEIR POLICIES. DO YOU
9 SEE THAT?

10 A. I DO SEE THAT.

11 Q. AND THAT IS CORRECT, ISN'T IT?

12 MR. FIELD: OBJECTION TO THE EXTENT IT
13 CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

14 THE COURT: YES, OVERRULED.

15 THE WITNESS: AND CLARITY -- COULD YOU
16 CLARIFY THE INTERPRETATION OF "INDIVIDUAL AGENCY" FOR
17 THIS LINE OF QUESTIONING?

18 BY MR. RIENZI:

19 Q. I UNDERSTAND THEM TO BE TALKING ABOUT FOSTER
20 CARE AGENCIES. AND SO THE WAY I AM LOOKING AT IT IS IN
21 EXHIBIT 16 THE CITY TELLS PEOPLE TO GO TO THIS FOSTER
22 CARE AGENCY.

23 A. I JUST ASKED THAT BECAUSE WE ARE ALSO CONSIDERED
24 AN AGENCY OF THE STATE. SO IT'S NOT CLEAR TO ME THAT
25 THIS IS TALKING EXCLUSIVELY ABOUT FOSTER CARE AGENCIES.

1 Q. OKAY. DO YOU SEE THAT IT SAYS THESE ARE MINIMUM
2 REQUIREMENTS?

3 A. YES, I DO.

4 Q. WHAT DO YOU UNDERSTAND THAT TO MEAN?

5 A. LESS THAN WHAT IS REQUIRED.

6 Q. OKAY. AND TO THIS DAY, THIS IS A DOCUMENT THAT
7 THE DEPARTMENT OF HUMAN SERVICES IS SENDING POTENTIAL
8 FOSTER PARENTS TO, CORRECT?

9 MR. FIELD: YOUR HONOR, THIS IS NOT A
10 DEPARTMENT OF HUMAN SERVICES DOCUMENT.

11 THE COURT: I BELIEVE SHE INDICATED THAT
12 THE RESOURCE, THE PARENT RESOURCE THAT YOU GAVE TO HER
13 FROM THE CITY OF PHILADELPHIA WAS DATED.

14 MR. RIENZI: I UNDERSTAND THAT, YOUR
15 HONOR. IT APPEARS ON THEIR WEBSITE. AND SO I AM ASKING
16 A QUESTION ABOUT IT BECAUSE THEY ARE STILL REFERRING
17 PEOPLE TO THIS AGENCY. SO I AM SIMPLY TRYING TO FIND
18 OUT --

19 BY MR. RIENZI:

20 Q. WELL, LET ME ASK YOU. I WILL ASK A DIFFERENT
21 QUESTION. DO YOU DISAGREE WITH THE LANGUAGE YOU SEE ON
22 PAGE 7 THAT THOSE REQUIREMENTS FOR RESOURCE PARENTS ARE
23 MINIMUMS?

24 A. I DON'T RUN THIS AGENCY, SO I CAN'T SPEAK -- I
25 CAN'T ANSWER THAT.

1 Q. THOSE ARE THE REQUIREMENTS FOR CERTIFYING A
2 FOSTER FAMILY, CORRECT?

3 MR. FIELD: OBJECTION TO THE EXTENT IT
4 CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

5 THE COURT: THIS IS NOT HER DOCUMENT.

6 MR. RIENZI: I KNOW IT'S NOT HER
7 DOCUMENT. IT'S THE DOCUMENT THAT THE CITY SENDS TO
8 FOSTER PARENTS TO LOOK AT.

9 THE COURT: THIS IS NOT HER DOCUMENT. SO
10 SHE CANNOT TELL YOU WHETHER OR NOT THESE ARE THE
11 MINIMUM -- THESE ARE THE REQUIREMENTS TO CERTIFY.

12 MR. RIENZI: SO FAIR ENOUGH. I AM ASKING
13 HER IF SHE AGREES WITH THE DOCUMENT. SHE DOESN'T HAVE
14 TO TELL ME WHAT THEY MEANT. DOES SHE AGREE?
15 BY MR. RIENZI:

16 Q. DO YOU AGREE, COMMISSIONER FIGUEROA, TO THE
17 STATEMENT IN THE DOCUMENT THAT YOU ARE SENDING FOSTER
18 PARENTS TO?

19 MR. FIELD: I OBJECT TO THIS IN THAT THE
20 DOCUMENT IS PRINTING PORTIONS OF REGULATIONS AND THE
21 WITNESS HAS ALREADY SAID SHE IS ONLY GENERALLY FAMILIAR
22 WITH THOSE REGULATIONS.

23 THE COURT: CAN YOU STATE WHETHER OR NOT
24 THESE ARE THE MINIMUM REQUIREMENTS?

25 THE WITNESS: THESE ARE NOT THE

1 REGULATIONS IN THEIR ENTIRETY.

2 BY MR. RIENZI:

3 Q. AND IT'S YOUR UNDERSTANDING OF THE WAY THE
4 FOSTER CARE SYSTEM WORKS THAT FOSTER CARE AGENCIES ARE
5 ALLOWED TO VARY THEIR POLICIES FOR APPROVAL OF RESOURCE
6 PARENTS, ISN'T IT?

7 MR. FIELD: OBJECTION TO THE AMBIGUITY IN
8 "AGENCIES" THERE, YOUR HONOR.

9 THE COURT: YES. SUSTAINED.

10 BY MR. RIENZI:

11 Q. IT IS YOUR UNDERSTANDING THAT FOSTER CARE
12 AGENCIES THAT WORK WITH THE CITY OF PHILADELPHIA ARE
13 PERMITTED BY STATE LAW TO VARY THEIR POLICIES FOR
14 APPROVAL OF FOSTER FAMILIES, CORRECT?

15 MR. FIELD: OBJECTION TO THE EXTENT IT
16 CALLS FOR A LEGAL CONCLUSION.

17 THE COURT: OVERRULED. CAN YOU ANSWER
18 THAT QUESTION?

19 THE WITNESS: I AM NOT SURE BECAUSE
20 IRREGARDLESS WE HAVE OUR EXISTING CONTRACT THAT
21 IDENTIFIES WHAT THEY ARE REQUIRED TO MEET.

22 BY MR. RIENZI:

23 Q. SO IS IT YOUR POSITION THAT FOSTER CARE AGENCIES
24 THAT WORK WITH THE CITY OF PHILADELPHIA ARE NOT ALLOWED
25 TO VARY THEIR REQUIREMENTS FOR BECOMING A FOSTER PARENT?

1 THE COURT: WHAT DO YOU MEAN BY "VARY
2 THEIR REQUIREMENTS"?

3 BY MR. RIENZI:

4 Q. THERE ARE REQUIREMENTS LISTED IN STATE LAW,
5 CORRECT?

6 A. YES.

7 Q. AND I APOLOGIZE. YOU ARE AWARE THAT THERE ARE
8 REQUIREMENTS IN STATE LAW FOR BECOMING A FOSTER FAMILY,
9 CORRECT?

10 A. I AM AWARE, YES.

11 Q. AND MY QUESTION TO YOU IS, ARE AGENCIES ALLOWED
12 TO VARY AND TO ADD TO THOSE REQUIREMENTS?

13 A. I BELIEVE I HAVE ANSWERED THAT. THEY ARE
14 REQUIRED TO FOLLOW THE CONTRACT WITH THE CITY OF
15 PHILADELPHIA IRREGARDLESS OF WHAT THIS GUIDE MIGHT
16 STIPULATE.

17 Q. AS I MATTER OF STATE LAW, IS IT YOUR
18 UNDERSTANDING THAT THEY ARE ALLOWED TO TREAT THESE AS
19 MINIMUM REQUIREMENTS?

20 MR. FIELD: OBJECTION TO THE LEGAL
21 CONCLUSION.

22 THE COURT: YES. SUSTAINED. SUSTAINED.
23 I AM NOT QUITE SURE WHERE -- WHAT REQUIREMENTS WE ARE
24 TALKING ABOUT.

25 BY MR. RIENZI:

1 Q. NO ONE FROM YOUR AGENCY HAS COME TO YOU TO SAY
2 WE ARE REFERRING PEOPLE TO A MANUAL THAT IS TELLING THEM
3 THE WRONG THING, HAVE THEY?

4 A. NOT THAT HAS BEEN BROUGHT TO MY LEVEL.

5 Q. AND NO ONE HAS TOLD THAT YOU THAT THE CITY'S
6 WEBSITE SAYS ANYTHING WRONG ABOUT BEING A FOSTER PARENT
7 EITHER, CORRECT?

8 A. WE HAVE GOTTEN FEEDBACK THAT THE INFORMATION IS
9 DATED.

10 Q. WHEN?

11 A. WE ARE IN THE PROCESS OF REDOING OUR ENTIRE
12 WEBSITE.

13 Q. WHEN DID YOU GET THAT FEEDBACK?

14 A. WE HAVE GOTTEN THAT FROM OUR STAFF AND WE HAVE
15 GOTTEN THAT FROM PROVIDERS. AND I CANNOT GIVE YOU AN
16 EXACT DATE, BUT I WILL TELL YOU IN THE COURSE OF THE TWO
17 YEARS I HAVE BEEN A COMMISSIONER, THAT IT'S REGULAR
18 FEEDBACK THAT WE GET REGARDING OUR WEBSITE.

19 Q. IS ANY OF THAT FEEDBACK RELATED TO THE LANGUAGE
20 ON YOUR WEBSITE THAT SAYS AGENCIES CAN HAVE SLIGHTLY
21 DIFFERENT REQUIREMENTS?

22 A. I DIDN'T ANSWER THAT QUESTION.

23 Q. YOU DID OR DID NOT?

24 A. I DID NOT.

25 Q. OKAY. I AM ASKING YOU IF ANY OF THE FEEDBACK

1 YOU HAVE RECEIVED RELATES TO THE SENTENCE ON THE CITY'S
2 WEBSITE THAT SAYS EACH AGENCY HAS SLIGHTLY DIFFERENT
3 REQUIREMENTS.

4 A. WHAT ARE YOU REFERENCING NOW.

5 Q. NOW I AM BACK AT THE ORIGINAL WEBSITE THAT WE
6 LOOKED AT. IT SAYS: BIRTH, MARRIAGE AND LIFE EVENTS ON
7 THE FIRST PAGE. AND THEN IT HAS THIS BOX?

8 A. YES, THANK YOU.

9 Q. AND YOU SAID YOU HAVE RECEIVED FEEDBACK THAT THE
10 INFORMATION ON YOUR WEBSITE IS DATED. AND I AM SIMPLY
11 TRYING TO FIND OUT WHETHER ANY OF THAT FEEDBACK RELATES
12 TO THE SENTENCE ON THE WEB PAGE THAT SAYS EACH AGENCY
13 HAS SLIGHTLY DIFFERENT REQUIREMENTS, SPECIALTIES, AND
14 TRAINING PROGRAMS.

15 A. IT HAS BEEN GENERAL FEEDBACK.

16 Q. NO ONE HAS SPECIFICALLY TOLD YOU THAT THAT
17 SENTENCE ON YOUR WEBSITE WAS WRONG?

18 A. NOT THAT PARTICULAR SENTENCE.

19 Q. AND AS YOU SIT HERE TODAY, YOU DON'T HAVE ANY
20 INTENTION OF CHANGING THAT, DO YOU?

21 A. I'M CERTAINLY GOING TO --

22 MR. FIELD: OBJECTION, CALLS FOR
23 SPECULATION.

24 THE COURT: SUSTAINED.

25 MR. RIENZI: PERMISSION TO APPROACH, YOUR

1 HONOR.

2 THE COURT: YES.

3 BY MR. RIENZI:

4 Q. HANDING YOU A DOCUMENT LABELED PLAINTIFF'S
5 EXHIBIT 18. AND IT'S THE WEBSITE FROM AN ORGANIZATION
6 CALLED THE SECOND CHANCE.

7 A. A SECOND CHANCE.

8 Q. A SECOND CHANCE. ARE YOU FAMILIAR WITH A SECOND
9 CHANCE?

10 A. I AM.

11 Q. WHAT ARE THEY?

12 A. THEY'RE A FOSTER CARE PROVIDER AGENCY AND THEY
13 ALSO DO FAMILY GROUP DECISION-MAKING.

14 Q. WHAT IS FAMILY GROUP DECISION-MAKING?

15 A. IT'S BASICALLY A TEAMING PROCESS TO HELP
16 DETERMINATION OF THE PROGRESS ON A CASE.

17 Q. I WOULD LIKE TO DIRECT YOUR ATTENTION TO THE
18 SECOND SENTENCE IN THE BOX AT THE TOP OF THE PAGE UNDER
19 KINSHIP CARES. AND IT READS: AS THE ONLY AGENCY IN THE
20 COUNTRY THAT EXCLUSIVELY DELIVERS SERVICES TO THE ENTIRE
21 KINSHIP TRIAD, CHILD, CAREGIVER, AND BIRTH PARENTS, ITS
22 APPROACH IS PURE KINSHIP.

23 DO YOU SEE THAT?

24 A. I DO.

25 MR. FIELD: YOUR HONOR, I WOULD OBJECT TO

1 THE QUESTION BOTH ON RELEVANCE AND HEARSAY. THIS IS NOT
2 A DHS DOCUMENT.

3 THE COURT: WELL, OVERRULED. I AM NOT
4 QUITE SURE WHERE WE ARE GOING BUT --

5 MR. RIENZI: I WILL GET THERE QUICKLY,
6 YOUR HONOR.

7 THE COURT: OKAY.

8 BY MR. RIENZI:

9 Q. A SECOND CHANCE SAYS ON ITS WEBSITE THAT IT
10 EXCLUSIVELY DOES KIN CARE, CORRECT?

11 A. THAT'S THEIR TERMINOLOGY, YES.

12 Q. DO YOU BELIEVE IT WOULD VIOLATE THE PUBLIC
13 ACCOMMODATIONS LAW FOR SECOND CHANCE TO EXCLUSIVELY DO
14 KINSHIP CARE?

15 MR. FIELD: OBJECTION, CALLS FOR A LEGAL
16 CONCLUSION.

17 THE COURT: SUSTAINED.

18 BY MR. RIENZI:

19 Q. HAVE YOU EVER INVESTIGATED A SECOND CHANCE FOR
20 THE FACT THAT IT SAYS IT EXCLUSIVELY DOES KIN CARE?

21 MR. FIELD: OBJECTION TO THE EXTENT THAT
22 IT ASSUMES DHS INVESTIGATES ON SUCH SUBJECTS.

23 THE COURT: OVERRULED. SHE CAN ANSWER.

24 THE WITNESS: CAN YOU REPEAT?

25 BY MR. RIENZI:

1 Q. HAVE YOU EVER INVESTIGATED A SECOND CHANCE FOR
2 THE CLAIM ON ITS WEBSITE THAT IT EXCLUSIVELY DOES KIN
3 CARE?

4 A. NO, BECAUSE THEY SERVE EVERYBODY WE SEND TO
5 THEM.

6 Q. YOU DIDN'T CUT OFF REFERRALS TO A SECOND CHANCE?

7 A. THEY ACCEPT EVERYBODY WE SEND TO THEM.

8 Q. YOU DID NOT CUT OFF REFERRALS TO A SECOND
9 CHANCE?

10 A. NO.

11 Q. FOR SECOND CHANCE YOU DECIDED THAT WHAT THEY
12 ACTUALLY DO IS WHAT MATTERS, CORRECT?

13 THE COURT: SUSTAINED.

14 MR. FIELD: OBJECTION, YOUR HONOR.

15 BY MR. RIENZI:

16 Q. FOR SECOND CHANCE YOU DID NOT THINK THAT YOU
17 SHOULD CUT OFF REFERRALS SIMPLY BASED ON THEIR STATEMENT
18 ON THE WEBSITE, CORRECT?

19 A. CORRECT. AS A MARKETING DOCUMENT, NOT A DIRECT
20 RESPONSE TO A QUESTION ASKED.

21 Q. IS IT YOUR TESTIMONY THAT SECOND CHANCE
22 CURRENTLY DOES NONKINSHIP FOSTER CARE?

23 MR. FIELD: CAN YOU REPEAT THE QUESTION,
24 PLEASE, COUNSEL?

25 BY MR. RIENZI:

1 Q. IS IT YOUR TESTIMONY THAT A SECOND CHANCE
2 CURRENTLY DOES NONKINSHIP FOSTER CARE?

3 A. THAT'S NOT THE WORDS I USE.

4 Q. IS THAT TRUE?

5 A. THOSE ARE NOT THE WORDS I USE.

6 Q. IS -- DOES A SECOND CHANCE CURRENTLY DO
7 NONKINSHIP FOSTER CARE?

8 A. YES.

9 Q. WHEN DID YOU FIND THAT OUT?

10 A. I DON'T HAVE -- I DON'T KNOW THAT I CAN TELL YOU
11 A DATE.

12 Q. WAS IT WITHIN THE LAST MONTH OR FURTHER AGO THAN
13 THAT?

14 A. PROBABLY AS LONG AS I HAVE KNOWN SECOND CHANCE.

15 Q. WHICH IS HOW LONG?

16 A. IN MY CAPACITY AS COMMISSIONER, TWO YEARS.

17 Q. WAS THERE A TIME WHEN SECOND CHANCE ONLY DID
18 KINSHIP CARE?

19 A. I DON'T KNOW.

20 Q. YOU NEVER DID ANY INVESTIGATION TO FIND THAT
21 OUT?

22 THE COURT: WELL, SHE NEVER DID ANY
23 INVESTIGATION OF KINSHIP CARE.

24 BY MR. RIENZI:

25 Q. TO FIND OUT WHETHER SECOND CHANCE ONLY FOCUSED

1 ON KINSHIP CARE?

2 MR. FIELD: IT HAS BEEN ANSWERED, YOUR
3 HONOR.

4 THE COURT: IT WAS. SUSTAINED.

5 BY MR. RIENZI:

6 Q. OTHER THAN YOUR CLAIM THAT IT IS IN THE
7 CONTRACT, IS THE POLICY THAT A FOSTER CARE AGENCY MUST
8 PROVIDE A HOME STUDY TO ANY COUPLE THAT WANTS IT WRITTEN
9 DOWN ANYPLACE ELSE?

10 MR. FIELD: OBJECTION, YOUR HONOR. THAT
11 IS NOT THE WITNESS'S TESTIMONY REGARDING THE CONTRACT.

12 THE COURT: OVERRULED.

13 THE WITNESS: THE CONTRACT -- BY THE
14 NATURE OF A CONTRACT IS YOU'RE BOUND TO THE SERVICES
15 THAT YOU HAVE AGREED TO DO ON BEHALF OF THE CITY OF
16 PHILADELPHIA. IT CLEARLY INDICATES THAT SERVICES
17 INCLUDE TRAINING, RECRUITMENT AND CERTIFICATION OF
18 FOSTER HOME.

19 BY MR. RIENZI:

20 Q. AND THE CONTRACT DOES NOT SAY TO DO IT FOR ALL
21 FAMILIES, DOES IT?

22 A. I THINK WE HAVE ALREADY ANSWERED THAT, THAT IT'S
23 -- IN THIS VERY LONG DOCUMENT I CANNOT SPEAK TO THAT
24 SPECIFIC.

25 Q. WE WILL LET THE CONTRACT SPEAK FOR ITSELF ON

1 THAT POINT.

2 OTHER THAN THE CONTRACT, HAVE YOU EVER
3 SEEN THIS POLICY WRITTEN ANYPLACE ELSE?

4 A. JUST CLARIFY, WHAT DO YOU MEAN POLICY AS A
5 SPECIFIC POLICY OF WHO?

6 Q. YOUR CLAIMED POLICY THAT A FOSTER AGENCY MUST
7 PROVIDE THE HOME STUDY FOR ANY PROSPECTIVE FAMILY THAT
8 WANTS IT?

9 A. ONLY AS IT IS REQUIRED THROUGH THE CONTRACT.

10 Q. SO NO, YOU HAVE NOT SEEN IT WRITTEN ANYPLACE BUT
11 THE CONTRACT, CORRECT?

12 A. I DON'T KNOW.

13 Q. THERE IS NO PLACE THAT YOU CAN NAME FOR ME TODAY
14 THAT THAT IS WRITTEN OTHER THAN THE CONTRACT, CORRECT?

15 A. I CAN'T ANSWER SO I WOULD HAVE TO SAY I DON'T
16 KNOW.

17 Q. OKAY. YOU DON'T DOUBT THE SINCERITY OF
18 CATHOLIC'S RELIGIOUS BELIEFS, DO YOU?

19 A. NO, I DO NOT.

20 Q. AND I BELIEVE YOU SAID EARLIER YOU DON'T DOUBT
21 THAT THEY ARE IN FACT RELIGIOUS, DO YOU?

22 A. NO, I DON'T DOUBT THAT AT ALL.

23 Q. AND YOU UNDERSTAND, I BELIEVE YOU TESTIFIED
24 YESTERDAY, THAT CATHOLIC'S POSITION ABOUT HOME STUDIES
25 IS A RELIGIOUS DECISION, CORRECT?

1 A. YES, IN THEIR VIEW, YES.

2 Q. AND YOU TOLD CATHOLIC THAT YOU WOULD NOT MAKE AN
3 EXCEPTION TO ALLOW CATHOLIC TO CHOOSE NOT TO DO CERTAIN
4 HOME STUDIES, CORRECT?

5 A. MY POSITION WAS THAT IF YOU REMOVE THAT
6 INDIVIDUAL COMMUNITY AND INSERTED AFRICAN AMERICAN OR
7 LATINO, IT WOULD NOT BE EVEN A QUESTION. SO TO ME IT
8 WAS CLEARLY DISCRIMINATORY IN NATURE.

9 Q. BECAUSE TO YOU IT'S AKIN TO RACISM?

10 A. IT'S DISCRIMINATING AGAINST A PARTICULAR
11 COMMUNITY.

12 Q. I BELIEVE YOU SAID BEFORE THAT YOU HAVE NO
13 EVIDENCE THAT ANY ACTUAL GAY COUPLE EVER ASKED CATHOLIC
14 TO PERFORM THE SERVICE, IS THAT CORRECT?

15 A. COULD YOU REPHRASE THAT.

16 Q. YOU ARE NOT AWARE OF ANY ACTUAL GAY COUPLE THAT
17 EVER ASKED CATHOLIC TO PERFORM A HOME STUDY, CORRECT?

18 A. I AM NOT AWARE.

19 MR. FIELD: YOUR HONOR, I BELIEVE THAT
20 MISCHARACTERIZES THE WITNESS'S TESTIMONY.

21 THE COURT: NO, I BELIEVE SHE TESTIFIED
22 TO THAT ALREADY.

23 BY MR. RIENZI:

24 Q. BUT YOU STILL WON'T MAKE ANY EXCEPTION FOR
25 CATHOLIC?

1 A. THAT THEY CAN DISCRIMINATE AGAINST ONE
2 PARTICULAR COMMUNITY?

3 Q. THAT THEY CAN ALLOW THE OTHER 28 OR 29 AGENCIES
4 IN THE CITY TO DO THAT HOME STUDY. YOU WILL NOT ALLOW
5 THEM AN EXCEPTION, CORRECT?

6 A. I BELIEVE I HAVE ANSWERED THAT. I WOULD NOT
7 ALLOW ONE ORGANIZATION TO DISCRIMINATE IN THE WAY THAT I
8 WOULD NOT ALLOW THE OTHER 28 TO CHOOSE THEN TO
9 DISCRIMINATE AGAINST OTHER COMMUNITIES. IT'S CERTAINLY
10 A VERY DANGEROUS PLACE FOR THE CITY TO ENTER INTO TO
11 ALLOW DISCRIMINATION OF ANY COMMUNITY.

12 Q. YOU AGREE THAT TRANSFERRING FOSTER KIDS FROM
13 THEIR HOMES IS NOT IN THEIR BEST INTEREST, CORRECT?

14 A. I DO AGREE WITH THAT.

15 Q. YOU AGREE IT WOULD BE TRAUMATIC TO TRANSFER KIDS
16 FROM THEIR FOSTER HOMES?

17 MR. FIELD: OBJECTION, CALLS FOR
18 SPECULATION, YOUR HONOR.

19 THE COURT: OVERRULED. YOU MAY ANSWER.

20 THE WITNESS: THAT'S NOT ALWAYS THE CASE.
21 SO IT'S NOT A YES OR NO ANSWER.

22 BY MR. RIENZI:

23 Q. YOUR REASON -- STRIKE THAT.

24 YOU HAVE ALREADY TESTIFIED EARLIER TODAY
25 AND I BELIEVE ON TUESDAY THAT YOU SHUT DOWN INTAKE AT

1 CATHOLIC TO PROTECT THE BEST INTEREST OF CHILDREN,
2 CORRECT?

3 A. THAT'S CORRECT.

4 Q. AND THE REASON -- YOUR REASON FOR DOING THAT WAS
5 THAT YOU DIDN'T WANT TO PLACE CHILDREN AT CATHOLIC WHO
6 MIGHT LATER HAVE TO BE MOVED, CORRECT?

7 A. THAT IS CORRECT, OR ADD ADDITIONAL CHILDREN THAT
8 WOULD HAVE TO POSSIBLY BE MOVED.

9 Q. BECAUSE MOVING CHILDREN FROM CATHOLIC COULD BE
10 TRAUMATIC FOR THEM, CORRECT?

11 A. AS I STATED EARLIER, IT'S NOT A YES OR NO
12 ANSWER.

13 Q. WELL THEN, I DON'T UNDERSTAND YOUR REASON. I
14 THOUGHT YOUR ARGUMENT WAS I DON'T WANT TO PUT MORE KIDS
15 THERE, RIGHT? YOU SAID YOU DIDN'T WANT TO PUT MORE KIDS
16 AT CATHOLIC, CORRECT?

17 A. I THINK WHAT I DIDN'T HAVE A CHANCE TO SAY IS
18 THAT EACH CASE IS AN INDIVIDUAL SITUATION. IN
19 GENERALIZATION, MOVING KIDS IS NOT SOMETHING THAT THE
20 CITY WANTS TO HAVE TO DO AS IT RELATES TO A DISRUPTION
21 FOR A CHILD.

22 Q. AND THE GENERAL REASON FOR THAT GENERAL VIEW
23 THAT YOU DON'T WANT TO MOVE KIDS IS WHAT?

24 A. IS THAT WE WANT TO MAKE SURE THAT WE MAINTAIN
25 THE BEST INTEREST OF THE CHILD.

1 Q. AND FOR SOME CHILDREN IT WON'T BE IN THEIR BEST
2 INTEREST TO BE TRANSFERRED FROM HOME TO HOME, CORRECT?

3 A. WELL, WE HOPE IN THE BEST INTEREST THAT WE
4 ACTUALLY DON'T HAVE TO MOVE HOME TO HOME. WE BELIEVE
5 VERY STRONGLY SINCE 50 PERCENT OF THE CATHOLIC SOCIAL
6 SERVICES ARE WITH KIN, THAT KIN WOULD WANT TO CONTINUE
7 TO TAKE CARE OF THEIR OWN KIN AND THAT THEY WOULD
8 TRANSFER TO ANOTHER AGENCY. THAT'S CERTAINLY THE
9 CONVERSATION WE WOULD HAVE WITH THE OTHER FOSTER PARENTS
10 WHO ARE AMAZING AND ALSO EXPRESSED THAT THEIR GENERAL
11 CARE -- AND EVERYBODY KNOWS THAT FOSTER PARENTS DO THIS
12 BECAUSE THEY LOVE THE CHILDREN, AND THAT WOULD BE A VERY
13 DIFFICULT POSITION TO HAVE TO PUT A FOSTER PARENT,
14 BECAUSE ULTIMATELY IT WILL BE THE FOSTER PARENTS WHO
15 WILL HAVE TO DECIDE WHETHER OR NOT THEY WANT TO MOVE TO
16 ANOTHER FOSTER AGENCY OR IF THEY ARE WILLING TO NO
17 LONGER HAVE A CHILD IN THEIR HOME.

18 Q. YOU HEARD SOME OF THEM TESTIFY ON MONDAY THAT
19 THEY MAY NOT CHOOSE TO TRANSFER TO ANOTHER AGENCY,
20 CORRECT?

21 MR. FIELD: OBJECTION, MISCHARACTERIZES
22 PRIOR TESTIMONY.

23 THE COURT: SUSTAINED.

24 BY MR. RIENZI:

25 Q. WERE YOU IN THE ROOM WHEN THE FOSTER MOTHERS

1 TESTIFIED ON MONDAY?

2 A. I WAS.

3 Q. YOU HEARD THEM SAY THAT THEY DO NOT WANT TO
4 TRANSFER AWAY FROM CATHOLIC, CORRECT?

5 A. I HEARD THEY WERE NOT SURE.

6 Q. YOU DIDN'T HEAR THEM SAY THAT THEY DON'T WANT TO
7 DO IT?

8 A. THEY ALL SAID THAT THEY WERE NOT SURE. THEY
9 COULD NOT STATE AT THIS TIME.

10 Q. THEY ALL STATED THAT THEY DID NOT WANT TO,
11 CORRECT?

12 MR. FIELD: ASKED AND ANSWERED, YOUR
13 HONOR.

14 THE COURT: SUSTAINED.

15 BY MR. RIENZI:

16 Q. THEY SAID THEY WERE NOT SURE WHAT THEY WOULD DO
17 IF CATHOLIC WAS SHUT DOWN, BUT YOU AGREE THAT THEY ALL
18 EXPRESSED A PREFERENCE TO REMAIN WITH CATHOLIC, CORRECT?

19 MR. FIELD: OBJECTION, YOUR HONOR.

20 THE COURT: SUSTAINED.

21 BY MR. RIENZI:

22 Q. YOU SAID THIS MORNING THAT YOUR REASON FOR
23 CLOSING INTAKE WAS TO PROTECT THE BEST INTEREST OF THE
24 CHILDREN, CORRECT?

25 A. YES, CORRECT.

1 Q. THAT WAS NOT YOUR EXPLANATION FOR THE FREEZE AT
2 THE TIME YOU INSTITUTED IT, WAS IT?

3 A. I DON'T UNDERSTAND THE QUESTION.

4 Q. THAT EXPLANATION AS THE REASON FOR YOUR FREEZE
5 WAS NOT THE REASON YOU GAVE AT THE TIME, WAS IT?

6 MR. FIELD: OBJECTION, GAVE TO WHOM?

7 MR. RIENZI: ANYBODY.

8 THE WITNESS: I DON'T KNOW. THAT'S NOT
9 TRUE. I HAD PLENTY OF CONVERSATIONS INTERNALLY
10 REGARDING THAT MATTER.

11 BY MR. RIENZI:

12 Q. WHO DID YOU TELL THAT IT WAS IN THE BEST
13 INTEREST OF THE CHILDREN AND THAT'S WHY YOU WERE DOING
14 THE FREEZE?

15 A. MY EXECUTIVE TEAM.

16 Q. AND WHO IS ON THAT TEAM?

17 A. YOU WANT ME TO NAME ALL OF THEM?

18 Q. HOW BIG IS IT?

19 A. IT'S ALL OF THE DEPUTIES AS WELL AS THE
20 OPERATIONAL DIRECTORS. MY TEAM IS ABOUT 15 PEOPLE.

21 Q. FOR BOTH OF OUR GOOD, I WILL SAY NO THANK YOU.

22 A. OKAY.

23 Q. YOU AUTHORIZED COMMISSIONER ALI TO SEND THE
24 E-MAIL TO CUA LEADERSHIP ON MARCH 26 TELLING THEM ABOUT
25 THE SHUTDOWN, CORRECT?

1 A. I DID.

2 Q. AND THAT E-MAIL DID NOT TELL CUA LEADERSHIP THAT
3 THE REASON FOR THE SHUTDOWN WAS THE BEST INTEREST OF THE
4 CHILD, CORRECT?

5 A. WE NEVER PROVIDE FOR THE PURPOSES OF THE
6 PROVIDERS THE REASONS WHY WE ARE CLOSING INTAKE FOR ANY
7 PROVIDER. IT'S NOT FAIR TO THAT PROVIDER TO PUT OUT
8 THEIR PERSONAL BUSINESS IN REGARDS TO WHAT IS HAPPENING
9 TO THEM.

10 Q. YOU DIDN'T TELL CATHOLIC THAT THE REASON FOR THE
11 SHUTDOWN WAS THE BEST INTEREST OF THE CHILDREN, DID YOU?

12 A. NO. WE EXPLAINED THAT WE HAD TO INVESTIGATE
13 THIS FURTHER.

14 Q. AND YOU TOLD THEM THE REASON FOR THE SHUTDOWN
15 WAS THE POSSIBILITY THAT THEY WOULD NOT DO A HOME STUDY
16 FOR SAME-SEX COUPLES, CORRECT?

17 A. VIOLATION OF THE FAIR PRACTICES ORDINANCE, YES.

18 Q. DO YOU UNDERSTAND THAT SOME FOSTER MOTHERS AND
19 FOSTER CHILDREN WOULD BE HARMED IF CATHOLIC IS FORMED TO
20 CLOSE -- FORCED TO CLOSE?

21 THE COURT: WHAT DO YOU MEAN BY "HARMED"?

22 MR. FIELD: OBJECTION TO SPECULATION,
23 YOUR HONOR.

24 THE COURT: SUSTAINED.

25 BY MR. RIENZI:

1 Q. DID YOU HEAR MS. SIMMS-BUSCH TESTIFY ABOUT HOW
2 HER CHILDREN WOULD LOSE THE SOCIAL WORKER THEY HAVE
3 BONDED WITH IF CATHOLIC IS FORCED TO CHOSE?

4 MR. FIELD: OBJECTION, YOUR HONOR,
5 MISCHARACTERIZES THE WITNESS'S TESTIMONY. SHE
6 REPRESENTED SHE WOULD NOT -- SHE DID NOT KNOW WHAT SHE
7 WOULD DO IF CATHOLIC WAS FORCED TO CLOSE.

8 BY MR. RIENZI:

9 Q. DID YOU HEAR MS. SIMMS-BUSCH TESTIFY THAT HER
10 CHILDREN WOULD LOSE THE SOCIAL WORKER WHO HAS A BOND
11 WITH HER KIDS IF CATHOLIC IS FORCED TO CLOSE? DID YOU
12 HEAR THAT?

13 THE COURT: OVERRULED. YOU MAY ANSWER.

14 THE WITNESS: JUST TO CLARIFY, YOU'RE
15 TALKING ABOUT THE SOCIAL WORKER VERSUS THE FOSTER
16 PARENT?

17 BY MR. RIENZI:

18 Q. YES. FOR THAT QUESTION I AM TALKING ABOUT THE
19 SOCIAL WORKER WHO MS. SIMMS-BUSCH TESTIFIED ABOUT, THE
20 CATHOLIC SOCIAL WORKER.

21 A. SO COULD YOU REPEAT? I JUST WANTED TO CLARIFY
22 YOU WERE TALKING ABOUT THE SOCIAL WORKER.

23 Q. SURE. YOU HEARD MS. SIMMS-BUSCH TESTIFY THAT
24 HER CHILDREN WOULD LOSE THE CATHOLIC SOCIAL WORKER WHO
25 HAS A BOND WITH THEM IF CATHOLIC IS FORCED TO CLOSE?

1 A. I DID HEAR THAT, YES.

2 Q. YOU HEAR MS. PAUL TESTIFY ABOUT HOW SHE WOULD
3 LOSE THE ABILITY TO RELY ON THE SOCIAL WORKERS SHE HAS
4 TRUSTED FOR DECADES, CORRECT?

5 A. THAT IS CORRECT.

6 Q. YOU HEARD MS. PAUL TESTIFY ABOUT HOW HER HOME IS
7 AVAILABLE RIGHT NOW, CORRECT?

8 A. I DID HEAR THAT, YES.

9 Q. AND YOU HEARD MS. FULTON TESTIFY ABOUT HER --
10 HOW HER CHILDREN MAY BE TRANSFERRED AWAY FROM HER IF
11 CATHOLIC CLOSES, CORRECT?

12 A. ONLY IF SHE CHOOSES TO NOT TRANSFER TO ANOTHER
13 AGENCY.

14 Q. WHICH SHE SAID SHE MIGHT CHOOSE TO DO, CORRECT?

15 A. AND SHE SAID SHE WAS NOT SURE.

16 Q. BUT YOU HEARD HER TESTIFY ABOUT HOW HER CHILDREN
17 MIGHT BE TRANSFERRED AWAY FROM HER IF CATHOLIC CLOSES,
18 CORRECT?

19 A. I HEARD THAT THEY MIGHT.

20 Q. AND YOU HEARD HOW DHS IN THE PAST HAS BEEN
21 UNABLE TO FIND A HOME FOR ONE OF THOSE CHILDREN,
22 CORRECT?

23 A. NO.

24 Q. YOU DIDN'T HEAR THAT?

25 A. I DON'T RECALL THAT.

1 Q. OKAY.

2 A. I MEAN, IF YOU HAVE IT AND YOU WOULD LIKE ME TO
3 SEE THE TRANSCRIPT.

4 Q. THAT'S FINE.

5 AT A MINIMUM, ALL OF THESE FOSTER MOTHERS
6 WOULD BE FORCED TO GO TO AN AGENCY THAT IS NOT THEIR
7 FIRST CHOICE IF CATHOLIC IS CLOSED, CORRECT?

8 A. THAT IS CORRECT.

9 Q. DON'T THESE WOMEN HAVE A RIGHT TO BE AT THE
10 FOSTER AGENCY THAT IS THEIR FIRST CHOICE?

11 A. THEY HAVE THE RIGHT TO BE AT THE FOSTER CARE
12 AGENCY THEY CHOOSE.

13 Q. BUT IF THE CITY FORCES CATHOLIC TO SHUT DOWN,
14 THESE WOMEN WILL NOT BE ALLOWED TO BE AT THE AGENCY THAT
15 THEY TESTIFIED IS THEIR FIRST CHOICE, CORRECT?

16 A. IF CATHOLIC CHOOSES NOT TO ENTER INTO A FULL
17 CONTRACT, THEN YES, THEY'RE GOING TO HAVE TO FIND NEW
18 HOMES.

19 Q. AND TO YOUR KNOWLEDGE, THE ONLY REASON THAT
20 CATHOLIC WOULD REFUSE TO DO THAT IS BECAUSE THE CITY IS
21 INSISTING ON ITS POLICY ABOUT DOING HOME STUDIES FOR
22 ANYONE WHO ASKS, CORRECT?

23 A. THE CITY IS INSISTING THAT CATHOLIC SOCIAL
24 SERVICES COMPLY WITH THEIR CONTRACT.

25 Q. AND THE ONLY PIECE OF YOUR VIEW OF THE CONTRACT

1 THAT YOU UNDERSTAND TO BE ANY PROBLEM FOR CATHOLIC IS
2 YOUR INSISTENCE THAT CATHOLIC MUST PROVIDE A HOME STUDY
3 FOR ANY COUPLE WHO ASKS, CORRECT?

4 A. CAN YOU CLARIFY MY INSISTENCE?

5 Q. SURE. SO WHAT I AM TRYING TO GET AT IS THERE IS
6 A DISPUTE BETWEEN YOU AND CATHOLIC ABOUT WHAT THE
7 CONTRACT MEANS, RIGHT?

8 A. I THINK THERE'S A DISPUTE THAT IS BEYOND JUST ME
9 AS AN INDIVIDUAL PERSON.

10 Q. JUST TO BE CLEAR, BETWEEN DHS AND CATHOLIC. I
11 DON'T AT ALL MEAN TO PERSONALIZE IT AND SAY IT'S JUST
12 YOU. OTHER THAN THE ISSUE OF DOING HOME STUDIES FOR
13 EVERY SINGLE COUPLE WHO ASKS, YOU ARE NOT AWARE OF ANY
14 OTHER REASON THAT CATHOLIC WOULD NOT ENTER INTO A NEW
15 CONTRACT WITH YOU, ARE YOU?

16 MR. FIELD: OBJECTION, YOUR HONOR. HE IS
17 ASKING ABOUT CATHOLIC'S REASONS FOR DOING SOMETHING,
18 WHICH THE COMMISSIONER WOULD NOT KNOW.

19 THE COURT: SUSTAINED.

20 BY MR. RIENZI:

21 Q. HAS CATHOLIC STATED ANY REASON TO YOU THAT IT
22 WOULD BE UNABLE TO ENTER INTO A NEW CONTRACT OTHER THAN
23 DHS'S INSISTENCE THAT IT MUST DO HOME STUDIES FOR
24 EVERYONE WHO ASKS?

25 A. THEY HAVE INDICATED THEY WOULD NOT COMPLY

1 BECAUSE THEY WOULD NOT CERTIFY SAME-SEX COUPLES, WHICH
2 IS A PORTION OF THE SERVICE THAT IS REQUIRED TO DELIVER.

3 Q. I UNDERSTAND THAT'S YOUR UNDERSTANDING OF THE
4 CONTRACT. AND I AM ASKING, HAS CATHOLIC TOLD YOU THERE
5 IS ANYTHING ELSE THAT WOULD STOP THEM FROM ENTERING INTO
6 A NEW CONTRACT?

7 A. OTHER THAN COMPLYING? NO.

8 Q. OTHER THAN THAT ONE ISSUE?

9 A. OTHER THAN COMPLYING, NO.

10 Q. NO. I WANT -- I DON'T WANT THE BROAD WORD
11 "COMPLY." I AM ASKING YOU A SPECIFIC QUESTION. HAVE
12 THEY --

13 A. WELL, IF YOU CAN'T DELIVER AN ELEMENT OF YOUR
14 CONTRACT THEN --

15 Q. I UNDERSTAND YOUR ARGUMENT. I AM ASKING YOU --
16 YOU HAVE IDENTIFIED ONE SPECIFIC PROBLEM CATHOLIC HAS,
17 THE HOME STUDIES FOR SAME-SEX COUPLES?

18 A. IT'S A PRETTY BIG PROBLEM.

19 Q. I AM ASKING YOU TO TELL ME IF THERE ARE ANY
20 OTHER PROBLEMS THAT CATHOLIC HAS STATED THAT WOULD STOP
21 THEM FROM ENTERING INTO THE CONTRACT WITH YOU?

22 MR. FIELD: YOUR HONOR, HE IS ASKING
23 ABOUT WHETHER OR NOT THINGS WOULD STOP CATHOLIC FROM
24 ENTERING INTO A CONTRACT.

25 MR. RIENZI: YOUR HONOR, I AM ASKING

1 ABOUT NEGOTIATIONS THAT THEY HAVE HAD, AND I SIMPLY WANT
2 TO NARROW THE FIELD AND BE CLEAR. I THINK HER TESTIMONY
3 IS THAT THE ONLY ISSUE THAT CATHOLIC HAS RAISED IS THIS
4 ONE ISSUE. AND I WOULD JUST LIKE CONFIRMATION THAT IT
5 IS NOT ANYTHING ELSE, THAT -- IT'S A REASONABLE QUESTION
6 ABOUT DISCUSSIONS SHE HAS HAD.

7 THE COURT: OVERRULED.

8 THE WITNESS: THAT WAS UP UNTIL
9 YESTERDAY. THERE HAS BEEN TESTIMONY PROVIDED THAT WAS
10 NEW INFORMATION TO US THAT HAS CERTAINLY CAUSED SOME
11 CONCERN.

12 BY MR. RIENZI:

13 Q. I AM ASKING YOU ABOUT CATHOLIC'S NEGOTIATIONS
14 WITH YOU. HAS CATHOLIC TOLD YOU THERE IS ANYTHING ELSE
15 THAT WOULD STOP THEM FROM ENTERING INTO THAT CONTRACT
16 OTHER THAN --

17 A. AND I AM ANSWERING YES, BECAUSE YESTERDAY THEY
18 INDICATED A NEW REQUIREMENT THAT THEY HAVE WITH A FOSTER
19 PARENT THAT WE WERE COMPLETELY UNAWARE OF UNTIL IT WAS
20 PROVIDED IN TESTIMONY BY JAMES AMATO YESTERDAY.

21 Q. YOU WERE UNAWARE THAT CATHOLIC -- STRIKE THAT.

22 MR. RIENZI: PERMISSION TO APPROACH, YOUR
23 HONOR.

24 THE COURT: YES.

25 BY MR. RIENZI:

1 Q. I AM GOING TO HAND YOU A DOCUMENT LABELED
2 EXHIBIT 2, WHICH IS -- IT WAS AN ATTACHMENT TO A BRIEF
3 THE CITY FILED, WHICH IS A COPY OF YOUR DECLARATION. I
4 JUST ASK YOU TO LOOK AT THAT AND TELL ME IF YOU HAVE
5 SEEN IT BEFORE.

6 A. I HAVE.

7 Q. AND THAT'S YOUR DECLARATION?

8 A. IT IS.

9 Q. AND YOU SIGNED IT?

10 A. I DID.

11 Q. CAN YOU TURN TO PAGE 6, PLEASE. IN PARAGRAPH 28
12 YOU SAY THAT YOU DECIDED TO SUSPEND REFERRALS AND YOU
13 SAY: I DID THIS BECAUSE CSS TOLD US IT COULD NOT COMPLY
14 WITH ITS CONTRACT. DO YOU SEE THAT?

15 A. I DO.

16 Q. CSS NEVER USED THE WORDS "COULD NOT COMPLY WITH
17 ITS CONTRACT," DID IT?

18 A. THIS IS MY DECLARATION, SO MY INTERPRETATION
19 OF --

20 Q. THAT'S WHAT I WANTED TO BE CLEAR ON. WHEN YOU
21 SAY COULD NOT COMPLY WITH ITS CONTRACT, THAT'S YOUR
22 INTERPRETATION, CORRECT?

23 A. THAT IN CONSULTATION WITH OUR LEGAL COUNSEL.

24 Q. THAT'S FINE. BUT YOU ARE NOT TELLING THE COURT
25 THAT CSS SAID IT CAN'T COMPLY WITH ITS CONTRACT,

1 CORRECT?

2 A. WELL, THEY SAID THEY WON'T DELIVER A SERVICE, SO
3 IF YOU CAN'T DELIVER PART OF YOUR CONTRACT, I DON'T KNOW
4 HOW ELSE TO DEFINE THAT.

5 MR. FIELD: YOUR HONOR, I OBJECT TO THIS
6 LINE OF QUESTIONING. THIS AFFIDAVIT PARAGRAPH DOES NOT
7 CONTRADICT ANY OF HER PRIOR TESTIMONY.

8 MR. RIENZI: YOUR HONOR, I AM NOT ASKING
9 HER IF IT DOES. I AM SIMPLY TRYING TO FIGURE OUT WHAT
10 SHE MEANT AND GET CLARITY THAT WHEN SHE SAID CSS TOLD US
11 IT COULD NOT COMPLY WITH ITS CONTRACT, THAT IN FACT
12 THAT'S AN INTERPRETATION. THAT IS NOT WHAT CSS ACTUALLY
13 SAID.

14 THE COURT: IT'S NOT THE WORDS THAT THEY
15 USED.

16 MR. RIENZI: YES. THAT'S WHAT I AM JUST
17 TRYING TO GET CLARITY ON.

18 MR. FIELD: IT WAS ASKED AND ANSWERED,
19 YOUR HONOR.

20 THE COURT: I THINK SHE HAS ANSWERED.

21 MR. RIENZI: YES.

22 BY MR. RIENZI:

23 Q. RIGHT NOW, INTAKES ARE FROZEN?

24 MR. FIELD: OBJECTION TO THE
25 CHARACTERIZATION OF "FROZEN."

1 BY MR. RIENZI:

2 Q. I'M SORRY. WHAT IS THE RIGHT PHRASE?

3 A. INTAKE IS CLOSED.

4 Q. INTAKE IS CLOSED RIGHT NOW, CORRECT?

5 A. THAT'S CORRECT.

6 Q. WHICH IS EASIER FOR THE CENTRAL REFERRAL UNIT,
7 MAKING A PLACEMENT TO ONE OF CATHOLIC'S HOMES WHEN
8 INTAKE IS CLOSED OR WHEN INTAKE IS NOT CLOSED?

9 A. IT HAS NOT HAD AN IMPACT.

10 Q. I'M SORRY?

11 A. IT HAS NOT HAD AN IMPACT.

12 Q. ARE YOU SURE OF THAT? IT HAS HAD NO IMPACT?

13 A. IT HAS NOT IMPACTED OUR CONGREGATE CARE OR THE
14 USE OF OUR CHILD CARE ROOM. SO YES, I AM SURE OF THAT.

15 Q. HOW DO YOU KNOW THAT?

16 A. WELL, AVAILABILITY OF -- WELL, I KNOW THAT
17 THROUGH DATA.

18 Q. HOW DO YOU KNOW THAT? WHAT DATA TELLS YOU THAT?

19 A. I LOOK AT WEEKLY DATA.

20 Q. AND THAT WEEKLY DATA TELLS THAT YOU THE CLOSURE
21 OF INTAKE HAS HAD NO EFFECT ON CONGREGATE CARE?

22 A. THAT'S CORRECT.

23 Q. WHAT DO YOU LOOK AT IN THE DATA TO KNOW THAT?

24 A. LOOK AT THE NUMBER OF YOUTH THAT ARE IN
25 CONGREGATE CARE AND WHERE THEY ARE LOCATED.

1 Q. HOW DO YOU KNOW THAT THERE HAS BEEN NO IMPACT
2 FROM THE CLOSURE OF INTAKE?

3 A. BECAUSE THE NUMBER HAS REMAINED THE SAME OR
4 REDUCED.

5 Q. THERE'S A LOT OF VARIABLES THAT GO INTO THAT
6 NUMBER, AREN'T THERE?

7 A. YES. AND I HAVE A PRETTY AMAZING PERFORMANCE
8 AND TECHNOLOGY TEAM THAT ACTUALLY HAVE REALLY GREAT
9 DETAILED DATA ON THIS.

10 Q. TERRIFIC. HOW MANY KIDS ARE IN CONGREGATE CARE
11 RIGHT NOW?

12 A. I DON'T WANT TO -- SO WE HAVE DEPENDENT AND
13 DELINQUENT. AND SO WE ARE TALKING ABOUT JUST
14 DEPENDENCY. WE HAVE SOMEWHERE AROUND 715, 17.

15 Q. OKAY. AND ABOUT HOW MANY OF THOSE IN CONGREGATE
16 CARE COULD BE LIVING WITH FOSTER FAMILIES?

17 A. I COULD NOT SAY BECAUSE NOT ALL CHILDREN THAT
18 ARE IN CONGREGATE CARE ARE APPROPRIATE FOR FOSTER CARE
19 PLACEMENT.

20 Q. BUT SOME OF THEM ARE, CORRECT?

21 A. IT COULD BE.

22 Q. YOU'VE STATED PUBLICLY THAT ABOUT 250 OF THEM
23 COULD BE IN FAMILY HOMES, HAVEN'T YOU?

24 A. I STATED THAT WE WOULD WANT TO WORK TO INCREASE
25 THE AMOUNT.

1 MR. RIENZI: PERMISSION TO APPROACH, YOUR
2 HONOR.

3 THE COURT: YES.

4 BY MR. RIENZI:

5 Q. I AM HANDING THE WITNESS A DOCUMENT LABELED
6 EXHIBIT 19.

7 MS. FIGUEROA, I WOULD ASK YOU IF YOU ARE
8 FAMILIAR WITH THAT DOCUMENT.

9 A. I AM FAMILIAR WITH THAT DOCUMENT.

10 Q. YOU READ IT AROUND THE TIME IT CAME OUT?

11 A. I AM SURE I READ IT CLOSELY.

12 Q. WHAT IS IT?

13 A. IT'S A STORY IN REGARD TO OUR FOSTER CARE
14 RECRUITMENT EFFORT, WHICH I BELIEVE INITIATED THIS WHOLE
15 PROCESS.

16 MR. FIELD: YOUR HONOR, I JUST OBJECT TO
17 THIS EXHIBIT. IT'S A NEWSPAPER ARTICLE. IT'S NOT
18 AUTHORED BY THE DOCUMENT AND PUBLISHED BY -- LOOKS LIKE
19 PHILLY.COM.

20 MR. RIENZI: YOUR HONOR, NEWSPAPER
21 ARTICLES ARE SELF-AUTHENTICATING UNDER RULE 902. AND I
22 AM SIMPLY LOOKING TO ASK THE WITNESS A QUESTION ABOUT A
23 QUOTE THAT SHE GAVE IN THE ARTICLE.

24 MR. FIELD: THE QUOTES FROM THE ARTICLE
25 WOULD STILL BE HEARSAY, YOUR HONOR.

1 THE COURT: OVERRULED.

2 BY MR. RIENZI:

3 Q. MS. FIGUEROA, IF YOU WOULD TURN TO PAGE 3 OF
4 THAT PRINTOUT. DO YOU SEE A BOX AROUND SOME LANGUAGE IN
5 THE ARTICLE?

6 A. MM-HMM.

7 Q. CAN YOU READ THAT LANGUAGE ALOUD, PLEASE?

8 MR. FIELD: COUNSEL, CAN I JUST ASK
9 WHETHER THE BOX IS IN THE ORIGINAL PUBLICATION.

10 MR. RIENZI: THE BOX IS SOMETHING I PUT
11 TO INDICATE --

12 MR. FIELD: THANK YOU. SORRY ABOUT THAT.

13 MR. RIENZI: I PUT THE BOX ON IT TO
14 INDICATE THE LANGUAGE I WANTED TO DIRECT THE WITNESS TO.
15 THE BOX IS ESSENTIALLY -- CONSIDER IT HIGHLIGHTING,
16 PLEASE.

17 MR. FIELD: SO THIS IS NOT THE ORIGINAL
18 ARTICLE.

19 THE COURT: TO THE EXTENT HE PLACED THE
20 BOX AROUND --

21 MR. RIENZI: THE BOX WAS PLACED ON THE
22 ORIGINAL ARTICLE.

23 THE COURT: -- THE SENTENCE.

24 BY MR. RIENZI:

25 Q. COMMISSIONER FIGUEROA, CAN YOU READ THE LANGUAGE

1 IN THE BOX.

2 A. IN PHILADELPHIA ABOUT 700 CHILDREN ARE IN GROUP
3 HOME PLACEMENTS. OF THOSE FIGUEROA SAID ABOUT 250 COULD
4 BE LIVING WITH FAMILIES WHILE 450 MORE NEED TO STAY IN
5 STAFFED FACILITIES DUE TO PHYSICAL OR EMOTIONAL NEEDS.

6 Q. DO YOU RECALL TALKING TO THAT REPORTER?

7 A. I DO.

8 Q. AND YOU DIDN'T HAVE ANY REASON TO BE UNTRUTHFUL
9 TO THAT REPORTER, DID YOU?

10 A. NO.

11 Q. IS THAT AN ACCURATE DISCUSSION -- DESCRIPTION OF
12 WHAT YOU SAID TO THE REPORTER?

13 A. CORRECT, YEAH.

14 Q. SO YOU WOULD SAY THAT OF THE APPROXIMATELY 700
15 CHILDREN IN GROUP HOMES APPROXIMATELY 250 COULD BE
16 LIVING WITH FAMILIES, CORRECT?

17 A. I THINK THAT THE OPERATIVE IS "COULD," AS IT
18 REQUIRES A COURT PROCESS.

19 Q. I BELIEVE YOU SAID YOU HAVE DONE SOME RECRUITING
20 RECENTLY, IS THAT RIGHT?

21 A. YES, WE HAVE.

22 Q. AND YOU'VE GOT ABOUT 75 NEW FAMILIES SIGN UP?

23 A. ACTUALLY, I JUST RAN THE DATA AND IT'S WELL OVER
24 200.

25 Q. TERRIFIC. AND ARE SOME OF THOSE FAMILIES

1 ALREADY TAKING CARE OF KIDS?

2 A. NO.

3 Q. WHY NOT?

4 A. BECAUSE THEY ARE NEW RECRUITS, THEY'VE JUST BEEN
5 NEWLY CERTIFIED.

6 Q. SO NONE OF THOSE FAMILIES ARE TAKING CARE OF
7 KIDS, CORRECT?

8 A. I DON'T KNOW EXACTLY RIGHT NOW THAT NUMBER, BUT
9 THOSE ARE -- AS OF TODAY WE HAD WELL OVER 200 NEW
10 RECRUITED FAMILIES.

11 Q. TERRIFIC. BUT THEY ARE NEW. AND SO IT TAKES A
12 LITTLE WHILE BEFORE THEY CAN START TAKING CARE OF KIDS?

13 A. NO. ONCE THEY ARE CERTIFIED AND THEY'VE
14 COMPLETED THE PROCESS AND HAVE BEEN LICENSED, THEY ARE
15 PREPARED TO TAKE HOME.

16 Q. DO YOU KNOW HOW MANY OF THEM HAVE BEEN LICENSED?

17 A. I DON'T KNOW. I CAN'T ANSWER THAT RIGHT NOW,
18 AND I WOULD HIGHLIGHT THOUGH, AVAILABILITY DOES NOT
19 NECESSARILY MEAN APPROPRIATE PLACEMENT.

20 Q. HOW MANY OF THOSE 250 KIDS HAVE MOVED OUT OF
21 CONGREGATE CARE?

22 A. I DON'T UNDERSTAND YOUR QUESTION.

23 Q. YOU SAID YOU TOLD THE REPORTER THAT ABOUT 250
24 COULD BE LIVING WITH FAMILIES, CORRECT?

25 A. THAT IS CORRECT.

1 Q. I AM ASKING HOW MANY OF THEM ARE STILL IN
2 CONGREGATE CARE?

3 A. I ALSO EXPLAINED THAT IT'S A COURT PROCESS.

4 Q. I HEARD THAT PART. I'M ASKING HOW MANY ARE
5 STILL LIVING IN CONGREGATE CARE?

6 A. I SAID I DON'T HAVE THE EXACT NUMBER OFF THE TOP
7 OF MY HEAD TODAY.

8 Q. DO YOU HAVE A ROUGH NUMBER?

9 A. I BELIEVE I GAVE IT TO YOU.

10 Q. WHAT IS THE NUMBER YOU GAVE?

11 A. I SAID SOMEWHERE AROUND 700, 715.

12 Q. THAT'S THE SAME NUMBER ACTUALLY THAT YOU TOLD
13 THE JOURNALIST IN MARCH, ISN'T IT?

14 A. THAT IS CORRECT.

15 Q. SO THE NUMBER HAS NOT CHANGED?

16 A. THE NUMBERS HAVE NOT CHANGED.

17 Q. AND YOU ARE AWARE THAT THERE ARE AT LEAST A
18 COUPLE OF DOZEN PLACES AVAILABLE WITH FAMILIES THROUGH
19 CATHOLIC SOCIAL SERVICES RIGHT NOW?

20 A. ACCORDING TO THEIR TESTIMONY, YES.

21 Q. DO YOU HAVE ANY REASON TO THINK THAT NUMBER IS
22 WRONG?

23 A. I MEAN, I HAVE NOT VERIFIED THE NUMBERS, SO I
24 WOULD HOPE THAT WHAT THEY ARE SAYING IS ACCURATE.

25 Q. SO IF INTAKE WAS NOT CLOSED, SOME OF THOSE 250

1 KIDS COULD HAVE BEEN PLACED AT CATHOLIC, CORRECT?

2 MR. FIELD: OBJECTION, CALLS FOR
3 SPECULATION, YOUR HONOR.

4 THE COURT: SUSTAINED.

5 BY MR. RIENZI:

6 Q. THE REASON YOU RECRUITED MORE FOSTER FAMILIES IS
7 THAT YOU WANTED TO REDUCE THE NUMBER OF KIDS IN
8 CONGREGATE CARE, CORRECT?

9 A. I STATED THAT TO REDUCE THE OLDER POPULATION OF
10 -- OLDER YOUTH POPULATION AS WELL AS YOUTH WHO IDENTIFY
11 AS LGBTQ WHO WANTED TO BE IN AFFIRMING HOMES. SO WE
12 WERE TARGETING PARTICULAR AREAS.

13 Q. ONE OF THE PARTICULAR AREAS YOU TARGETED IS
14 REDUCING THE NUMBER OF KIDS IN CONGREGATE HOMES, ISN'T
15 IT?

16 A. THAT'S OLDER YOUTH, YES.

17 Q. I JUST WANT A CLEAR ANSWER IF I CAN.

18 THE COURT: SHE SAID YES.

19 MR. RIENZI: YES. OKAY. THANK YOU.

20 BY MR. RIENZI:

21 Q. BUT THE NUMBER OF KIDS IN CONGREGATE CARE
22 ACTUALLY HAS NOT CHANGED SINCE MARCH, CORRECT?

23 A. I WOULD JUST HIGHLIGHT THAT WE RUN A VERY
24 COMPLICATED SYSTEM, AND SO IT'S NOT WIDGETS. IT'S NOT
25 ONE FOR ONE. KIDS ARE ABUSED EVERY DAY. THEY ARE

1 NEGLECTED EVERY DAY. THEY END UP IN OUR PLACEMENT, IN
2 OUR CARE, BECAUSE THEIR FAMILIES CAN'T CARE FOR THEM.
3 WE ARE INCREDIBLY FORTUNATE THAT WE HAVE FOSTER CARE
4 AGENCIES, BUT IT'S NOT A ONE TO ONE. SO TO ASSUME THAT
5 BECAUSE THERE IS AVAILABILITY WILL REDUCE THE CONGREGATE
6 CARE IS AN OVEREXAGGERATION OF THE COMPLICATION OF OUR
7 WORK.

8 Q. I UNDERSTAND THAT IT'S COMPLICATED, AND I VERY
9 MUCH UNDERSTAND THAT THOSE KIDS HAVE BEEN ABUSED AND
10 BEEN THROUGH TERRIBLE TIMES. I AM TRYING TO GET CLARITY
11 ON YOUR PREVIOUS STATEMENTS THAT YOU WANT TO REDUCE THE
12 NUMBER OF KIDS IN CONGREGATE CARE, YOUR PREVIOUS
13 STATEMENT THAT 250 COULD BE LIVING WITH FAMILIES, AND
14 YOUR STATEMENT THAT THERE IS NO IMPACT AT ALL FROM NOT
15 SENDING ANY KIDS TO THE, SAY, 25 OR SO FAMILIES THAT ARE
16 AVAILABLE IN CATHOLIC SOCIAL SERVICES. CAN YOU EXPLAIN
17 TO ME HOW WE CAN CONNECT THOSE DOTS AND MAKE IT MAKE
18 SENSE?

19 A. THE ONLY DOT I COULD CONNECT IS THAT IF WE COME
20 BACK HERE IN THREE MONTHS I'M HOPING THAT ALL THESE
21 CERTIFIED HOMES, THAT WE WILL GREATLY REDUCE THAT
22 NUMBER. BUT THE NUMBERS THAT I AM PRESENTING ARE THE
23 NUMBERS THAT THE SYSTEM IS DEALING WITH TODAY.

24 Q. AND THOSE NUMBERS AGAIN ARE THE SAME AS THEY
25 WERE IN MARCH?

1 A. THEY HAVE NOT INCREASED SINCE THE CLOSURE. SO
2 OUR NEED FOR CATHOLIC SOCIAL SERVICES AVAILABILITY
3 CERTAINLY HAS NOT IMPACTED THE CONGREGATE CARE NUMBER.

4 Q. THERE ARE REAL KIDS WHO COULD BE IN THOSE HOMES
5 RIGHT NOW, AREN'T THERE?

6 A. I CAN'T SAY THAT WITHOUT A JUDICIAL DECISION.

7 Q. YOU CAN'T SAY EITHER WAY WHETHER THERE ARE REAL
8 KIDS WHO ARE IN CONGREGATE HOMES WHO COULD BE AT
9 CATHOLIC RIGHT NOW?

10 MR. FIELD: CALLS FOR SPECULATION, YOUR
11 HONOR.

12 THE COURT: SUSTAINED.

13 BY MR. RIENZI:

14 Q. THE REASON FOR YOUR DRIVE WAS TO GET FAMILIES
15 WHO COULD TAKE KIDS, SOME OF WHOM ARE IN CONGREGATE
16 CARE, CORRECT?

17 MR. FIELD: ASKED AND ANSWERED, YOUR
18 HONOR.

19 THE COURT: SUSTAINED.

20 BY MR. RIENZI:

21 Q. YOU DON'T KNOW EITHER WAY WHETHER THE
22 AVAILABILITY OF THOSE BEDS IN HOMES WITH CATHOLIC WOULD
23 HELP CHILDREN?

24 MR. FIELD: CALLS FOR SPECULATION, YOUR
25 HONOR.

1 THE COURT: SUSTAINED.

2 MR. RIENZI: YOUR HONOR, THE ENTIRE CASE
3 IS ABOUT HER PREDICTION OF THE BEST INTERESTS OF
4 CHILDREN.

5 MR. FIELD: MISCHARACTERIZES THE ENTIRE
6 CASE, YOUR HONOR.

7 THE COURT: SUSTAINED. SUSTAINED.

8 BY MR. RIENZI:

9 Q. WHEN THERE ARE NOT ENOUGH FOSTER HOME FOR KIDS,
10 CHILDREN SUFFER?

11 MR. FIELD: OBJECTION, YOUR HONOR.

12 THE COURT: SUSTAINED.

13 BY MR. RIENZI:

14 Q. TOO FEW FOSTER HOMES CAN RESULT IN CHILDREN
15 BEING MOVED AROUND?

16 MR. FIELD: CAN YOU REPEAT THE QUESTION,
17 COUNSELOR?

18 BY MR. RIENZI:

19 Q. TOO FEW FOSTER HOMES CAN RESULT IN CHILDREN
20 BEING MOVED AROUND?

21 MR. FIELD: CALLS FOR SPECULATION, YOUR
22 HONOR.

23 THE COURT: SUSTAINED.

24 MR. RIENZI: YOUR HONOR, SHE RUNS THIS
25 SYSTEM, AND I AM TRYING TO FIGURE OUT THE RELATIONSHIP

1 BETWEEN THE NUMBER OF HOMES AND THE IMPACT ON CHILDREN.

2 I AM SIMPLY TRYING TO GET HER TO TELL ME WHAT THE IMPACT
3 IS OF TOO FEW FOSTER HOMES. I WILL TRY AGAIN.

4 BY MR. RIENZI:

5 Q. DO YOU KNOW ANYTHING ABOUT THE IMPACT OF NOT
6 HAVING ENOUGH FOSTER HOMES?

7 A. NO. I MEAN, I DON'T UNDERSTAND THE QUESTION.

8 Q. YOU DON'T UNDERSTAND ANYTHING ABOUT THE
9 RELATIONSHIP BETWEEN THE NUMBER OF FOSTER HOMES
10 AVAILABLE AND THE WELL-BEING OF THE CHILDREN IN YOUR
11 CARE? YOU DON'T KNOW ABOUT A RELATIONSHIP BETWEEN THOSE
12 TWO THINGS?

13 THE COURT: THAT WASN'T YOUR QUESTION.

14 BY MR. RIENZI:

15 Q. DO YOU KNOW ANYTHING ABOUT THE RELATIONSHIP
16 BETWEEN THE NUMBER OF FOSTER HOMES AND THE WELL-BEING OF
17 THE CHILDREN IN YOUR CARE?

18 A. YES.

19 Q. AND WHAT IS THAT RELATIONSHIP?

20 A. THAT WE WOULD LIKE TO HAVE HOMES AVAILABLE FOR
21 CHILDREN WHO ARE IN OUR CARE.

22 Q. MORE FOSTER HOMES IS BETTER FOR THE KIDS IN YOUR
23 CARE, CORRECT?

24 A. MORE APPROPRIATE FOSTER HOMES ARE AVAILABLE FOR
25 KIDS IN OUR CARE THAT IS IN OUR BEST INTEREST, YES.

1 Q. AND YOU DON'T HAVE ANY REASON TO THINK THAT THE
2 HOMES CERTIFIED THROUGH CATHOLIC ARE INAPPROPRIATE, DO
3 YOU?

4 A. NO.

5 Q. BETWEEN 2016 AND 2017 THE STATE ACTUALLY PUT DHS
6 ON A PROVISIONAL LICENSE, DIDN'T IT?

7 A. IT WAS PRIOR TO MY ARRIVAL. SO WE -- I BELIEVE
8 JUNE OF 2017, I AM NOT SURE OF THE EXACT DATE, SO IT WAS
9 UNDER A -- WITHIN LESS THAN A YEAR OF MY TENURE THAT WE
10 RECEIVED A FULL LICENSE.

11 Q. SO WHEN YOU CAME IN, THAT WAS SOMETHING THAT
12 NEEDED YOUR ATTENTION, WASN'T IT?

13 A. YES. I ACTUALLY TOOK THE JOB HAVING WORKED IN A
14 NONPROFIT PREDOMINANTLY BECAUSE I FELT I COULD MAKE A
15 SIGNIFICANT DIFFERENCE, AND THE AGENCY WAS GOING THROUGH
16 A DIFFICULT TIME.

17 Q. AND ONE OF THE REASONS IT WAS ON A PROVISIONAL
18 LICENSE WAS THAT THE STATE FOUND MULTIPLE FAILURES TO
19 APPLY WITH APPLICABLE STATE REGULATIONS, CORRECT?

20 MR. FIELD: OBJECTION, YOUR HONOR. THE
21 WITNESS SAID SHE WAS NOT WITH THE AGENCY AT THAT TIME.

22 THE COURT: SUSTAINED.

23 BY MR. RIENZI:

24 Q. PART OF THE REASON YOU TOOK THE JOB WAS TO FIX
25 THIS PROBLEM, WASN'T IT, MS. FIGUEROA?

1 A. IT WAS.

2 Q. SO ARE YOU FAMILIAR WITH THE SCOPE OF THE
3 PROBLEM THAT LED TO THE PROVISIONAL LICENSE?

4 A. I AM FAMILIAR WITH THE ISSUES THAT THE STATE
5 PRESENTED, YES.

6 Q. AND ONE OF THOSE ISSUES WAS THE STATE SAYING
7 THAT THERE WERE MULTIPLE FAILURES TO COMPLY WITH
8 APPLICABLE STATE REGULATIONS, CORRECT?

9 A. I BELIEVE THAT MISCHARACTERIZES THE LICENSING
10 PROCESS.

11 Q. THE STATE TOLD YOU WHEN IT GAVE YOU A
12 PROVISIONAL LICENSE THAT DHS HAD FAILED TO COMPLY WITH
13 STATE REGULATIONS, DIDN'T IT?

14 A. IT CITES SPECIFIC REGULATIONS, YES.

15 Q. AND ONE OF THE FAILURES WAS ALLOWING CHILDREN TO
16 SLEEP OVERNIGHT TOO LONG IN THE DHS FACILITY WITHOUT
17 ADEQUATE AND TIMELY PLACEMENT, CORRECT?

18 A. THAT IS CORRECT.

19 Q. HAVING MORE FOSTER HOMES WOULD HELP YOU DEAL
20 WITH THAT PROBLEM, WOULDN'T IT?

21 A. WE GOT OUR LICENSE BACK BECAUSE WE REDUCED THE
22 UTILIZATION OF THE CHILD CARE ROOM.

23 Q. YOU STILL USE IT SOMETIMES THOUGH, HUH?

24 A. IN THE EVENT OF AN EMERGENCY WHEN A CHILD
25 ARRIVES AT 2 O'CLOCK IN THE MORNING.

1 Q. YOU ALSO USE IT SOMETIMES WHEN A CHILD DOESN'T
2 ARRIVE IN THE MIDDLE OF THE NIGHT, DON'T YOU?

3 A. WE -- THE UNFORTUNATE TIMES IS THERE IS A
4 TREMENDOUS COMPLEXITY. THERE'S USUALLY A LOT OF
5 INTELLECTUAL DISABILITY OR SIGNIFICANT VIOLENT BEHAVIORS
6 WHERE THE CHILD CAN'T BE IN A HOME, AND MOST FOSTER
7 PARENTS WON'T ACCEPT CHILDREN AT THAT HOUR WHO HAVE
8 SIGNIFICANT SEXUAL ACTING OUT, FIRE STARTERS, CUTTERS OR
9 HAVE VIOLENT TENDENCIES. THOSE ARE CHILDREN THAT
10 GENERALLY DO NOT END UP IN A FOSTER HOME. SO JUST TO BE
11 CLEAR, THE CHILDREN WHO ARE GENERALLY SPENDING OVERNIGHT
12 ARE NOT KIDS WHO END UP GOING INTO A GENERAL FOSTER CARE
13 PLACEMENT.

14 Q. YOU KEEP SAYING GENERALLY. SOME OF THOSE
15 CHILDREN DO END UP IN FOSTER CARE PLACEMENT, CORRECT?

16 A. SOME DO, YES.

17 Q. AND HAVING MORE HOMES WOULD MAKE IT LESS LIKELY
18 THAT YOU WOULD HAVE TO HAVE CHILDREN SLEEPING IN THE DHS
19 OFFICE, WOULDN'T IT?

20 MR. FIELD: OBJECTION, CALLS FOR
21 SPECULATION.

22 THE WITNESS: NOT NECESSARILY.

23 BY MR. RIENZI:

24 Q. BUT IT MIGHT, CORRECT?

25 MR. FIELD: OBJECTION, CALLS FOR

1 SPECULATION.

2 THE COURT: SUSTAINED.

3 BY MR. RIENZI:

4 Q. IT'S PRIORITY FOR DHS TO RECRUIT LGBTQ FOSTER
5 PARENTS, CORRECT?

6 A. AFFIRMING HOMES.

7 Q. SO ONE OF THEM IS TO RECRUIT LGBTQ AFFIRMING
8 HOMES, CORRECT?

9 A. CORRECT.

10 Q. YOU ALSO HAVE A PRIORITY OF RECRUITING MORE
11 LGBTQ FOSTER PARENTS, CORRECT?

12 A. CORRECT.

13 Q. YOU HAVE WORKED WITH THE MAYOR'S OFFICE OF LGBT
14 AFFAIRS ON SOME OF THAT RECRUITMENT?

15 A. ALONG WITH OTHER PROVIDERS, YES.

16 Q. AND SO RECRUITING EVENTS CAN BE AIMED AT
17 PARTICULAR SEGMENTS OF THE POPULATION?

18 A. AT ALL SEGMENTS, YES.

19 Q. THEY CAN ALSO BE AIMED AT PARTICULAR SEGMENTS,
20 CORRECT?

21 A. YES.

22 Q. AGENCIES ARE NOT OBLIGATED TO RECRUIT EVERYONE
23 ALL THE TIME, ARE THEY?

24 MR. FIELD: OBJECTION, YOUR HONOR. THAT
25 TESTIMONY IS NOT REGARDING AGENCIES AT THE MOMENT.

1 THE COURT: SUSTAINED. I THINK WE HAVE
2 BEEN THROUGH THIS ALREADY.

3 BY MR. RIENZI:

4 Q. ARE YOU FAMILIAR WITH THE MAYOR'S OFFICE OF LGBT
5 AFFAIRS?

6 A. I AM.

7 Q. YOU FOLLOW THAT OFFICE ON TWITTER?

8 A. I DO.

9 Q. IT'S AN OFFICE OF THE CITY GOVERNMENT?

10 A. IT IS.

11 Q. THAT OFFICE EXISTS TO HELP PEOPLE OF PARTICULAR
12 SEXUAL ORIENTATIONS?

13 MR. FIELD: OBJECTION, YOUR HONOR, TO THE
14 EXTENT THE WITNESS IS AWARE OF THE OFFICE'S PURPOSE.

15 MR. RIENZI: YES. I AM ASKING THE
16 QUESTION.

17 THE COURT: IF YOU KNOW.

18 THE WITNESS: I DON'T HAVE THE DEFINITION
19 OF THEIR MISSION STATEMENT ON THERE, BUT THAT SOUNDS
20 ABOUT RIGHT.

21 BY MR. RIENZI:

22 Q. I BELIEVE YOU SAID WHEN YOU DID YOUR
23 INVESTIGATION -- AND I'M MOVING BACK UP SO I CAN SITUATE
24 YOU. THIS MORNING YOU STARTED YOUR TESTIMONY BY TALKING
25 ABOUT YOUR INVESTIGATION AFTER HEARING FROM THE PHILLY

1 INQUIRER REPORTER. DO YOU REMEMBER THAT?

2 A. I DO.

3 Q. WHEN YOU DID THAT INVESTIGATION, YOU ONLY
4 CONTACTED FAITH-BASED FOSTER CARE AGENCIES, CORRECT?

5 A. THAT'S CORRECT.

6 Q. YOU DID NOT CONTACT ANY NONRELIGIOUS FOSTER CARE
7 AGENCIES, CORRECT?

8 A. ACTUALLY, I DID SPEAK WITH ONE OTHER NONFAITH
9 BASED FOSTER CARE AGENCY.

10 Q. WHICH ONE WAS THAT?

11 A. NORTHEAST TREATMENT CENTER.

12 Q. WHY DID YOU CONTACT NORTHEAST TREATMENT CENTER?

13 A. I HAVE A GOOD RELATIONSHIP WITH THE CEO AND
14 WANTED TO ASK ABOUT THEIR PRACTICES.

15 Q. DID YOU TALK ABOUT CATHOLIC'S PRACTICES?

16 A. NO.

17 Q. AS TO ALL OF THE OTHER NONRELIGIOUS FOSTER CARE
18 AGENCIES IN THE CITY, YOU DID NOT CALL THEM TO ASK THEM
19 THEIR POLICY ABOUT LGBT COUPLE APPLICANTS, CORRECT?

20 A. NO.

21 Q. HAVE YOU EVER CALLED NONRELIGIOUS AGENCIES TO
22 ASK THEM WHETHER THEY PERFORM HOME STUDIES FOR EVERYONE
23 WHO ASKED THEM?

24 A. ASIDE FROM NORTHEAST TREATMENT CENTER, NO.

25 Q. HAVE YOU EVER CALLED NONRELIGIOUS AGENCIES TO

1 TELL THEM THEY MUST IMPORTANT PERFORM HOME STUDIES FOR
2 EVERYONE WHO ASKS THEM?

3 A. NO.

4 Q. HAVE YOU EVER CALLED NONRELIGIOUS AGENCIES TO
5 ASK IF THEY EVER REFER HOME STUDIES TO ANOTHER AGENCY?

6 A. NO.

7 Q. YOU HAD A MEETING WITH JAMES AMATO IN OR AROUND
8 MARCH 15TH, CORRECT?

9 A. THAT'S CORRECT.

10 Q. WHERE DID THAT MEETING TAKE PLACE?

11 A. IN DEPUTY COMMISSIONER ALI'S CONFERENCE ROOM.

12 Q. THAT'S A GOVERNMENT OFFICE?

13 A. IT IS.

14 Q. AND WHO ATTENDED FOR THE CITY AT THAT MEETING?

15 A. IT WAS MYSELF, DEPUTY COMMISSIONER ALI, OUR
16 ATTORNEY WAS PRESENT, AND JIM BLACK, JAMES AMATO, AS
17 WELL AS COUNSEL FOR THE ARCHDIOCESE ATTENDED.

18 Q. DID YOU TAKE NOTES?

19 A. I DON'T RECALL.

20 Q. DO YOU RECALL IF ANYONE ELSE DID?

21 A. I BELIEVE OUR LEGAL COUNSEL DID.

22 Q. AT THAT MEETING YOU TOLD CATHOLIC THAT TIMES
23 HAVE CHANGED, DIDN'T YOU?

24 A. I DID.

25 Q. AND YOU TOLD THEM THAT IT'S NOT 100 YEARS AGO

1 ANYMORE, DIDN'T YOU?

2 A. CATHOLIC SOCIAL SERVICES INDICATED THAT THEY HAD
3 BEEN DOING THIS SERVICE FOR 100 YEARS. AND I EXPLAINED
4 THAT WOMEN DIDN'T HAVE THE RIGHTS AND AFRICAN AMERICANS
5 DIDN'T HAVE THE RIGHTS, AND I PROBABLY WOULD NOT BE
6 SITTING IN THE ROOM IF IT WAS 100 YEARS AGO.

7 Q. YOU EXPLAINED TO THEM THAT IT WAS NOT 100 YEARS
8 AGO ANYMORE, CORRECT?

9 MR. FIELD: ASKED AND ANSWERED.

10 THE WITNESS: I INDICATED, YES, THINGS
11 HAVE CHANGED SINCE 100 YEARS AGO.

12 BY MR. RIENZI:

13 Q. YOU TOLD CATHOLIC THAT THEY SHOULD LISTEN TO
14 POPE FRANCIS, DID YOU NOT?

15 A. I SAID IT WOULD BE GREAT IF WE FOLLOWED THE
16 TEACHINGS OF POPE FRANCIS, THE VOICE OF THE CATHOLIC
17 CHURCH.

18 Q. YOU TOLD CATHOLIC THAT THEY SHOULD NOT LISTEN TO
19 ARCHBISHOP CHAPUT ON THIS ISSUE, CORRECT?

20 A. I DON'T BELIEVE THOSE WERE MY WORDS.

21 Q. SO ON ONE HAND YOU SAID IT WOULD BE GREAT IF WE
22 WOULD LISTEN TO POPE FRANCIS, CORRECT?

23 A. UM-HUM.

24 Q. WAS THERE ANYONE ON THE OTHER SIDE YOU WERE
25 SAYING THEY SHOULD LISTEN TO POPE FRANCIS INSTEAD OF?

1 A. I STATED THE FIRST PART OF THAT, THAT, YOU KNOW,
2 IT WOULD BE GREAT IF WE LISTENED TO THE TEACHINGS AND
3 THE WORDS OF OUR CURRENT POPE FRANCIS.

4 Q. AND YOU SAID THAT THEY SHOULD NOT LISTEN TO THE
5 ARCHDIOCESE ON THIS ISSUE, CORRECT?

6 A. I ANSWERED THIS. I DON'T RECALL WHAT I SAID
7 SPECIFICALLY.

8 Q. OKAY. SO YOU KNOW YOU SAID WE SHOULD LISTEN TO
9 POPE FRANCIS, BUT YOU DON'T RECALL SAYING ANYTHING ABOUT
10 WHO WOULD BE LISTENING TO POPE FRANCIS --

11 MR. FIELD: ASKED AND ANSWERED.

12 THE WITNESS: I DON'T RECALL SAYING THE
13 ARCHBISHOP.

14 BY MR. RIENZI:

15 Q. DO YOU RECALL SAYING THE ARCHDIOCESE?

16 THE COURT: OVERRULED.

17 THE WITNESS: NO.

18 BY MR. RIENZI:

19 Q. DO YOU RECALL SAYING ANYONE ELSE IN DISTINCTION
20 WITH POPE FRANCIS?

21 A. NO.

22 Q. YOU TOLD THEM THAT THE HOME STUDY ISSUE WAS
23 GETTING ATTENTION AT THE HIGHEST LEVELS OF CITY
24 GOVERNMENT, DIDN'T YOU?

25 A. I DID.

1 Q. OKAY. AND YOU WERE REFERRING IN PART TO THE
2 MAYOR WHEN YOU SAID THAT, CORRECT?

3 A. AND MY CHAIN OF COMMAND, YES.

4 Q. SO WHEN YOU SAID THAT, YOU WERE REFERRING TO
5 YOURSELF AS THE HIGHEST LEVELS OF CITY GOVERNMENT?

6 A. CERTAINLY THE MANAGING DIRECTOR'S OFFICE. SO IN
7 THE CITY CHARTER I REPORT IN TO THE MANAGING DIRECTOR'S
8 OFFICE AND SUBSEQUENTLY THE MAYOR.

9 Q. YOU HAD DISCUSSED THIS ISSUE WITH THE MAYOR
10 BEFORE YOUR MEETING WITH CATHOLIC, CORRECT?

11 A. BRIEFLY.

12 Q. WHAT DID YOU SAY?

13 A. I SAID THAT I AM WORKING TO ADDRESS THE ISSUES.
14 THERE IS A NUMBER OF CHILDREN, AND THAT WE WILL BRIEF
15 HIM ONCE WE HAVE MADE DECISIONS ABOUT MOVING FORWARD.

16 Q. WHAT DID THE MAYOR SAY?

17 MR. FIELD: OBJECTION, ASSUMES FACTS NOT
18 IN THE RECORD.

19 THE COURT: SUSTAINED.

20 BY MR. RIENZI:

21 Q. DID THE MAYOR ANSWER YOU?

22 MR. FIELD: OBJECTION, ASSUMES FACTS NOT
23 IN RECORD.

24 MR. RIENZI: IT'S SIMPLY A QUESTION, YOUR
25 HONOR. SHE SAID WHAT SHE TOLD THE MAYOR. I AM ASKING

1 WHAT THE MAYOR SAID BACK.

2 MR. FIELD: OBJECTION, HEARSAY.

3 THE COURT: SUSTAINED.

4 MR. RIENZI: THE CITY IS A DEFENDANT,
5 YOUR HONOR. THE MAYOR IS THE MAYOR OF THE CITY. IT'S
6 AN ADMISSION, YOUR HONOR.

7 THE COURT: SUSTAINED.

8 MR. FIELD: OBJECTION AS WELL TO THE
9 EXTENT THERE WAS COUNSEL PRESENT.

10 BY MR. RIENZI:

11 Q. DID YOU KNOW THE MAYOR'S VIEWS BY THE TIME YOU
12 SAT DOWN TO MEET WITH CATHOLIC?

13 A. NO.

14 MR. FIELD: OBJECTION, CALLS FOR
15 SPECULATION.

16 THE COURT: SHE HAS ANSWERED.

17 BY MR. RIENZI:

18 Q. DID YOU DISCUSS CUTTING OFF INTAKE WITH THE
19 MAYOR'S OFFICE?

20 A. NO.

21 Q. THE MAYOR IS YOUR BOSS?

22 A. HE IS THE HEAD OF THE CITY. MY DIRECT BOSS IS
23 EVA GLADSTEIN.

24 Q. WHO IS EVA GLADSTEIN'S BOSS?

25 A. MIKE DIBERADINIS.

1 Q. WHO IS HIS BOSS?

2 A. THE MAYOR.

3 Q. WHO APPOINTED YOU?

4 A. THE MAYOR.

5 Q. DO YOU CONSIDER YOURSELF PART OF THE MAYOR'S
6 ADMINISTRATION?

7 A. I DO.

8 Q. YOU KNOW THE MAYOR'S VIEWS ABOUT THE
9 ARCHDIOCESE?

10 A. I DO NOW.

11 Q. WHEN DID YOU LEARN THE MAYOR'S VIEWS ABOUT THE
12 ARCHDIOCESE?

13 A. THROUGH THIS LITIGATION.

14 Q. YOU KNOW THAT HE DOES NOT LIKE THE ARCHDIOCESE
15 VERY MUCH, CORRECT?

16 A. I UNDERSTAND WHAT HAS BEEN PRESENTED, YES.

17 Q. DO YOU DOUBT THE TRUTHFULNESS OF WHAT HAS BEEN
18 PRESENTED?

19 THE COURT: IN REGARD TO --

20 MR. RIENZI: THE MAYOR'S VIEWS ON THE
21 ARCHDIOCESE.

22 THE WITNESS: I'M SORRY. CAN YOU REPEAT
23 WHAT YOU ARE ASKING ME.

24 BY MR. RIENZI:

25 Q. WHEN YOU SAID YOU KNOW WHAT HAS BEEN PRESENTED.

1 AND I GUESS I AM ASKING, DO YOU DOUBT THE TRUTHFULNESS
2 OF WHAT HAS BEEN PRESENTED? IT'S A LITTLE DIFFICULT
3 BECAUSE YOU'RE SAYING YOU KNOW WHAT'S BEEN PRESENTED --
4 I WILL ASK YOU THIS. WHEN YOU SAY I KNOW WHAT'S BEEN
5 PRESENTED, WHAT ARE YOU REFERRING TO?

6 A. I'M REFERRING TO THE EXHIBITS THAT YOU GUYS
7 PROVIDED IN THIS SUBMISSION.

8 Q. OKAY.

9 MR. RIENZI: PERMISSION TO APPROACH, YOUR
10 HONOR.

11 THE COURT: YES.

12 THE WITNESS: THE DATE OF MY WEDDING
13 ANNIVERSARY.

14 MR. FIELD: MULTIPLE POINTS, BUT I WOULD
15 LIKE TO START WITH AN OFFER OF PROOF ON THIS.

16 MR. RIENZI: SURE. SHE'S APPOINTED BY
17 THE MAYOR. SHE IS A MEMBER OF THE MAYOR'S
18 ADMINISTRATION. I THINK HER BOSS'S VIEWS ON THE
19 RELIGIOUS ENTITY THAT IS AT ISSUE HERE ARE HIGHLY
20 RELEVANT TO THE RELIGIOUS DISCRIMINATION CLAIM.

21 MR. FIELD: YOUR HONOR --

22 MR. RIENZI: I'D LIKE TO FINISH, PLEASE.

23 MR. FIELD: YES.

24 MR. RIENZI: SHE FOLLOWS MAYOR KENNEY ON
25 TWITTER AND I AM SHOWING SOME OF HIS PUBLIC STATEMENTS

1 ON TWITTER ABOUT THE ARCHDIOCESE AND ABOUT THE POPE, WHO
2 SHE TOLD THE ARCHDIOCESE IN A GOVERNMENT BUILDING WHO
3 THEY SHOULD LISTEN TO. IT'S HIGHLY RELEVANT, YOUR
4 HONOR.

5 MR. FIELD: YOUR HONOR, THIS STATEMENT IS
6 FROM 14TH OF NOVEMBER 2014. THE WITNESS TESTIFIED SHE
7 LEARNED ABOUT THIS MATERIAL THROUGH PLAINTIFF'S FILING
8 IN THIS LITIGATION. I AM NOT CLEAR HOW IT'S RELEVANT TO
9 THE TIMELINE OF THE QUESTIONS THAT COUNSEL IS ASKING
10 HER.

11 THE COURT: I'M GOING TO SUSTAIN THE
12 OBJECTION.

13 BY MR. RIENZI:

14 Q. MS. FIGUEROA, WHAT DO YOU KNOW ABOUT THE MAYOR'S
15 VIEWS ABOUT THE ARCHDIOCESE, OTHER THAN WHAT YOU HAVE
16 LEARNED IN THIS CASE?

17 A. NONE.

18 Q. NOTHING. SO UNTIL THIS CASE YOU HAD NO IDEA OF
19 THE MAYOR'S VIEWS ABOUT THE CATHOLIC CHURCH?

20 A. THAT'S CORRECT.

21 Q. YOU FOLLOW MAYOR KENNEY ON TWITTER?

22 A. I FOLLOW A LOT OF PEOPLE ON TWITTER, YES.

23 Q. AND YOU FOLLOW MAYOR KENNEY ON TWITTER?

24 A. I DO.

25 Q. WHEN YOU SEE AT THE TOP OF THAT DOCUMENT IT SAYS

1 JIM KENNEY, AT JIM S. KENNEY --

2 MR. FIELD: YOUR HONOR, THIS DOCUMENT IS
3 NOT IN THE RECORD. I'VE ALREADY OBJECTED TO IT.

4 THE COURT: AND I SUSTAINED THE
5 OBJECTION.

6 MR. RIENZI: AND I'M JUST ASKING HER TO
7 TELL ME IF SHE RECOGNIZES THE TWITTER HANDLE AS ONE THAT
8 SHE FOLLOWS.

9 THE WITNESS: I'VE FOLLOWED THE MAYOR
10 SINCE HE BECAME MAYOR, SO I WOULD NOT HAVE BEEN PRIVY TO
11 THIS ONE.

12 BY MR. RIENZI:

13 Q. WHEN DID YOU GET ON TWITTER?

14 MR. FIELD: OBJECTION TO THE RELEVANCE OF
15 THIS ENTIRE LINE OF QUESTIONING, YOUR HONOR.

16 THE COURT: SUSTAINED.

17 MR. RIENZI: YOUR HONOR, I WOULD LIKE TO
18 MAKE AN OFFER OF PROOF ABOUT THE DOCUMENTS FROM THE
19 MAYOR'S TWITTER ACCOUNT. I UNDERSTAND THAT YOU REJECTED
20 THAT. I WOULD JUST LIKE TO MAKE AN OFFER SO THAT IT IS
21 IN THE RECORD. MAY I DO THAT?

22 THE COURT: YES.

23 MR. RIENZI: MY OFFER OF PROOF IS AS
24 FOLLOWS, YOUR HONOR. I WOULD LIKE TO QUESTION THE
25 WITNESS ABOUT SEVERAL STATEMENTS HER BOSS, THE MAYOR,

1 HAS MADE ABOUT THE ARCHDIOCESE AND THE CATHOLIC CHURCH.
2 AND THERE ARE JUST SEVERAL TWEETS THAT I PROPOSE TO ASK
3 THE WITNESS ABOUT. THE FIRST ONE IS FROM NOVEMBER 14TH,
4 2014 SAYING: THE ARCH DON'T CARE ABOUT PEOPLE. IT'S
5 ABOUT IMAGE AND MONEY. POPE FRANCIS NEEDS TO KICK SOME
6 A-S-S HERE.

7 THE SECOND ONE IS A TWEET FROM THE MAYOR
8 FROM JUNE 25TH, 2012 THAT SAYS: I COULD CARE LESS ABOUT
9 THE PEOPLE AT THE ARCHDIOCESE.

10 THE NEXT ONE IS A TWEET FROM JULY 6TH,
11 2016 SAYING THAT: ARCHBISHOP CHAPUT'S, QUOTE, ACTIONS
12 ARE NOT CHRISTIAN.

13 AND OUR ARGUMENT ABOUT THE RELEVANCE OF
14 THOSE DOCUMENTS, YOUR HONOR, IS SIMPLY THAT THIS IS A
15 CASE ABOUT RELIGIOUS DISCRIMINATION. THESE ARE
16 STATEMENTS FROM THE WITNESS'S BOSS. AND SEVERAL CASES
17 QUITE RECENTLY, ACTUALLY, INCLUDING SOME THAT MAY GET
18 CITED BY THE SUPREME COURT THIS MORNING, HAVE TAKEN
19 JUDICIAL NOTICE OF AND ALLOWED INTRODUCTION OF TWEETS
20 FROM EXECUTIVES, OFFICE OF THE PRESIDENT OF THE UNITED
21 STATES. AND I WOULD JUST POINT THE COURT TO
22 INTERNATIONAL REFUGEE ASSISTANCE PROJECT VERSUS TRUMP,
23 IN THE 4TH CIRCUIT, 883 F.3RD 233; COMMONWEALTH V
24 BRADSHEER IN PENNSYLVANIA SUPERIOR COURT 2016 WL
25 7495120; AND HAWAII V TRUMP, WHICH FOR ALL I KNOW HAS

1 BEEN DECIDED BY THE SUPREME COURT THIS MORNING. OUR
2 ARGUMENT IS THAT IN A RELIGIOUS DISCRIMINATION CASE
3 ABOUT RELIGIOUS DISCRIMINATION BY THE CITY AGAINST THE
4 ARCHDIOCESE, THAT THE WITNESS'S BOSS'S VIEWS ON THE
5 ARCHDIOCESE ARE HIGHLY RELEVANT.

6 MR. FIELD: YOUR HONOR, I RENEW MY
7 OBJECTION OF THESE DOCUMENTS THAT WERE ADDRESSED AT
8 SIDEBAR YESTERDAY. I WOULD LIKE TO TRY TO INTRODUCE
9 THEM AND THE PERIODIZATION OF MY PRIOR OBJECTION DOES
10 NOT CHANGE. THESE ALL PREDATE THE DECISION AT ISSUE AND
11 THE WITNESS HAS ALREADY TESTIFIED THAT SHE WAS NOT AWARE
12 OF THIS INFORMATION AT THAT TIME.

13 THE COURT: SO THE OBJECTION IS
14 SUSTAINED.

15 BY MR. RIENZI:

16 Q. YOU TESTIFIED YESTERDAY THAT PART OF YOUR JOB IS
17 COMPLYING WITH STATE MANDATES, CORRECT?

18 A. THAT IS CORRECT.

19 Q. AND ONE OF THOSE STATE MANDATES IS
20 PENNSYLVANIA'S RELIGIOUS FREEDOM PROTECTION ACT,
21 CORRECT?

22 A. THAT IS CORRECT.

23 Q. AND YOU KNOW YOU HAVE OBLIGATIONS UNDER THAT
24 LAW, CORRECT?

25 A. I DO.

1 Q. WHAT ARE YOUR OBLIGATIONS UNDER THAT LAW?

2 A. I DON'T KNOW THAT OFF THE TOP OF MY HEAD SO....

3 Q. OKAY. WHAT DOES THE DEPARTMENT DO TO ENSURE
4 THAT IT COMPLIES WITH THAT LAW?

5 A. I AM NOT SURE. I DON'T KNOW.

6 Q. DO YOU UNDERSTAND THAT UNDER STATE LAW YOU CAN
7 ONLY BURDEN SOMEONE'S RELIGIOUS EXERCISE IF YOU HAVE A
8 COMPELLINGLY IMPORTANT REASON?

9 MR. FIELD: OBJECTION, YOUR HONOR. SHE
10 ALREADY SAID SHE WAS NOT AWARE OF HER OBLIGATIONS UNDER
11 THAT LAW.

12 MR. RIENZI: I DON'T BELIEVE THAT'S WHAT
13 SHE SAID.

14 THE COURT: OVERRULED.

15 MR. RIENZI: I BELIEVE SHE SAID SHE IS
16 AWARE.

17 THE COURT: OVERRULED.

18 BY MR. RIENZI:

19 Q. ARE YOU AWARE THAT UNDER THE RELIGIOUS FREEDOM
20 PROTECTION ACT DHS CAN ONLY BURDEN SOMEONE'S RELIGIOUS
21 EXERCISE IF THEY HAVE A COMPELLINGLY IMPORTANT REASON?

22 A. DO I UNDERSTAND IS THE QUESTION?

23 Q. DO YOU UNDERSTAND THAT THAT'S YOUR OBLIGATION?

24 A. I UNDERSTAND THAT, YES.

25 Q. HAVE YOU DONE ANYTHING TO ENSURE YOUR COMPLIANCE

1 WITH THAT OBLIGATION?

2 A. I AM NOT SURE THAT I UNDERSTAND THE QUESTION.

3 Q. AS YOU RUN YOUR DEPARTMENT, DO YOU DO ANYTHING
4 TO MAKE SURE THAT YOU DON'T BURDEN PEOPLE'S RELIGIOUS
5 EXERCISE?

6 A. YEAH, I AM NOT SURE I KNOW HOW TO ANSWER THAT
7 QUESTION.

8 Q. CAN YOU NAME ANYTHING THAT YOUR DEPARTMENT DOES
9 TO ENSURE THAT IT DOESN'T BURDEN PEOPLE'S RELIGIOUS
10 EXERCISE?

11 A. SURE. WE DON'T PRAY BEFORE OUR MEETINGS.

12 Q. OKAY. WHAT ELSE?

13 A. WE DON'T HAVE ANY RELIGIOUS ARTIFACTS IN OUR
14 OFFICES. WE DON'T REQUIRE OUR STAFF TO SIGN A PASTORAL
15 REFERENCE TO WORK AT THE DEPARTMENT. I THINK THOSE ARE
16 SOME GENERAL EXAMPLES OF WHAT THE CITY WOULD NOT DO AS A
17 CITY EMPLOYEE.

18 Q. YOU KNOW THAT YOUR BOSS, THE MAYOR, HAS TAKEN A
19 PUBLIC POSITION THAT HE DOES NOT LIKE RELIGIOUS FREEDOM
20 LAWS, LIKE THE RELIGIOUS FREEDOM PROTECTION ACT?

21 A. I DON'T KNOW THAT PERSONALLY.

22 Q. YOU DON'T KNOW ANYTHING ABOUT HIS VIEWS ON
23 RELIGIOUS LIBERTY LAWS?

24 A. I HAVE ANSWERED THAT BASED ON WHAT YOU HAVE
25 PRESENTED HERE, BUT NOT WHAT YOU ARE ASKING.

1 Q. THE MAYOR NEVER TOLD YOU THAT ENFORCING THE
2 RELIGIOUS FREEDOM PROTECTION ACT IS A PRIORITY OF HIS
3 ADMINISTRATION?

4 MR. FIELD: OBJECTION, YOUR HONOR. WHAT
5 IS THE RELEVANCE OF THIS LINE OF QUESTIONING?

6 THE COURT: SUSTAINED.

7 MR. FIELD: MOVE TO STRIKE.

8 THE COURT: WELL, SHE HAS NOT ANSWERED.
9 BY MR. RIENZI:

10 Q. YOU HAVE ASSERTED THAT YOU HAVE AN INTEREST IN
11 COMPLYING WITH THE CITY'S FAIR PRACTICES ORDINANCE,
12 CORRECT?

13 A. YES.

14 Q. AND YOU TESTIFIED YESTERDAY THAT YOU ARE
15 RESPONSIBLE FOR MEETING FEDERAL MANDATES RELATED TO
16 CHILD WELFARE WORK, CORRECT?

17 A. THAT'S CORRECT.

18 Q. YOU RECEIVED FEDERAL TANF FUNDING -- THAT'S
19 TEMPORARY AID TO NEEDY FAMILIES FUNDING -- FOR YOUR
20 FOSTER CARE PROGRAM, CORRECT?

21 A. THAT IS CORRECT.

22 Q. DHS HAS TO MAKE STATEMENTS TO THE FEDERAL
23 GOVERNMENT ABOUT ITS COMPLIANCE WITH TANF REGULATIONS TO
24 RECEIVE THAT MONEY, CORRECT?

25 A. THAT IS CORRECT.

1 Q. WHEN WAS THE LAST ONE YOU FILED?

2 A. I HAVE NO IDEA. MY FINANCE TEAM DOES THAT.

3 Q. DO YOU KNOW WHO SIGNS THAT?

4 MR. FIELD: OBJECTION TO RELEVANCE, YOUR
5 HONOR.

6 MR. RIENZI: I WILL GET TO THAT IN A
7 SECOND, YOUR HONOR.

8 THE COURT: OVERRULED.

9 THE WITNESS: THEY ARE PREPARED BY THE
10 FINANCE DEPARTMENT, AND I SIGN THE TANF DOCUMENT THAT
11 GETS SUBMITTED.

12 BY MR. RIENZI:

13 Q. AND YOU DON'T KNOW WHEN THE LAST ONE YOU SIGNED
14 WAS?

15 A. I DON'T RECALL THE DATE.

16 Q. DO YOU REMEMBER ROUGHLY?

17 A. NO.

18 Q. DO YOU REMEMBER IF IT WAS BEFORE OR AFTER
19 CLOSING INTAKE AT CATHOLIC?

20 A. THAT I DEFINITELY DON'T KNOW.

21 Q. OKAY. ARE YOU AWARE THAT UNDER FEDERAL FUNDING
22 REQUIREMENTS YOU HAVE AN OBLIGATION NOT TO INTERFERE
23 WITH A RELIGIOUS ORGANIZATION'S DEFINITION, PRACTICE OR
24 EXPRESSION OF ITS RELIGIOUS BELIEFS?

25 MR. FIELD: OBJECTION TO THE EXTENT IT

1 CALLS FOR A LEGAL CONCLUSION.

2 THE COURT: OVERRULED. SHE CAN ANSWER.

3 THE WITNESS: TO THE EXTENT THE
4 DEPARTMENT OF HUMAN SERVICES -- SO WE ARE A STATE
5 LICENSED COUNTY ADMINISTERED SO THE COUNTY
6 ADMINISTRATION CAN INDICATE ITS DELIVERED CHILD WELFARE
7 SERVICES, SO WHILE THERE'S FEDERAL FUNDING AND STATE
8 FUNDING, IT IS A COUNTY RUN SYSTEM.

9 BY MR. RIENZI:

10 Q. YOU MAKE CERTIFICATIONS TO THE FEDERAL
11 GOVERNMENT ABOUT YOUR COMPLIANCE WITH TANF REGULATIONS,
12 CORRECT?

13 A. THAT'S CORRECT.

14 Q. THAT INCLUDES CERTIFYING THAT YOU FOLLOW FEDERAL
15 LAW ASSOCIATED WITH THOSE FUNDS, CORRECT?

16 A. YES.

17 Q. AND ARE YOU AWARE THAT ONE OF THE FEDERAL LAWS
18 ASSOCIATED WITH RECEIVING THOSE FUNDS, WHICH YOU CERTIFY
19 THAT YOU FOLLOW, REQUIRES YOU TO ALLOW RELIGIOUS GROUPS
20 TO RETAIN INDEPENDENCE IN THE DEFINITION, PRACTICE AND
21 EXPRESSION OF THEIR RELIGIOUS BELIEFS?

22 A. YES.

23 Q. BUT YOU DON'T KNOW WHETHER YOU HAVE MADE THAT
24 CERTIFICATION SINCE THE INTAKE CLOSURE AT CATHOLIC?

25 A. I DON'T. THEY HAPPEN QUARTERLY, SO I DON'T

1 RECALL WHEN THE LAST -- AND IT'S NOT ON A REGULAR
2 STANDING SCHEDULE.

3 Q. WHEN YOU SIGNED THE LAST ONE, DID YOU DO ANY
4 ANALYSIS OF WHETHER YOU HAD VIOLATED IT BY CLOSING
5 INTAKE AT CATHOLIC?

6 MR. FIELD: OBJECTION, ASSUMES FACTS NOT
7 IN RECORD.

8 THE COURT: YES, SUSTAINED.
9 BY MR. RIENZI:

10 Q. HAVE YOU THOUGHT ABOUT WHETHER YOU VIOLATED YOUR
11 TANF FUNDING REQUIREMENTS TO THE FEDERAL GOVERNMENT BY
12 CLOSING INTAKE AT CATHOLIC?

13 A. HAVE I HAD A THOUGHT ABOUT IT?

14 Q. HAVE YOU EVER THOUGHT ABOUT THAT?

15 A. I CAN'T SAY THAT I HAVE THOUGHT ABOUT THAT.

16 Q. OKAY. AND I SUPPOSE YOU HAVE NOT FIGURED OUT
17 WHAT YOU ARE GOING TO SAY THE NEXT TIME YOU HAVE TO MAKE
18 THAT CERTIFICATION?

19 A. WELL, CERTAINLY --

20 MR. FIELD: OBJECTION, CALLS FOR
21 SPECULATION.

22 THE COURT: SUSTAINED.
23 BY MR. RIENZI:

24 Q. DO YOU KNOW WHAT THE CONSEQUENCES ARE OF MAKING
25 FALSE STATEMENTS TO THE FEDERAL GOVERNMENT IN THE

1 CONTEXT OF FEDERAL FUNDING?

2 A. NOT OFF THE TOP OF MY HEAD.

3 Q. DO YOU KNOW THAT YOUR AGENCY COULD LOSE ITS
4 FEDERAL FUNDING IF IT MAKES FALSE STATEMENTS TO THE
5 FEDERAL GOVERNMENT ABOUT ITS COMPLIANCE WITH TANF
6 REGULATIONS?

7 A. THAT SOUNDS PROBABLY ABOUT RIGHT.

8 Q. YOU UNDERSTAND YOU DO HAVE AN OBLIGATION TO OBEY
9 FEDERAL LAW?

10 A. I DO.

11 Q. WOULD YOU AGREE WITH ME THAT IT'S A COMPELLINGLY
12 IMPORTANT INTEREST OF YOURS TO OBEY FEDERAL LAW?

13 THE COURT: COMPELLING?

14 MR. RIENZI: COMPELLING.

15 BY MR. RIENZI:

16 Q. HOW ABOUT, WOULD YOU AGREE WITH ME YOU HAVE A
17 REALLY IMPORTANT --

18 MR. FIELD: OBJECTION, CALLS FOR A LEGAL
19 CONCLUSION, YOUR HONOR.

20 BY MR. RIENZI:

21 Q. WOULD YOU AGREE WITH ME THAT YOU HAVE A REALLY
22 IMPORTANT INTEREST --

23 MR. FIELD: ASKING FOR AN OFFER OF PROOF
24 OF THIS LINE OF QUESTIONING, YOUR HONOR.

25 THE COURT: SHE SAYS SHE HAS AN INTEREST.

1 MR. RIENZI: IN FOLLOWING FEDERAL LAW?

2 DID I GET THAT ANSWER? I APOLOGIZE.

3 THE COURT: SHE DID.

4 THE WITNESS: I DID.

5 MR. RIENZI: TERRIFIC. THANK YOU.

6 BY MR. RIENZI:

7 Q. HAS DHS INFORMED THE FEDERAL GOVERNMENT ABOUT
8 ITS INTAKE FREEZE AT CATHOLIC?

9 A. NO. WE INFORMED THE STATE.

10 Q. BUT YOU HAVE NOT INFORMED THE FEDERAL DEPARTMENT
11 OF HEALTH AND HUMAN SERVICES WHO ADMINISTERS YOUR TANF
12 FUNDING?

13 A. THE STATE ACTUALLY WORKS WITH THE FEDS IN
14 REGARDS TO OUR TANF FUNDING.

15 Q. DO YOU KNOW IF THE STATE HAS INFORMED THE
16 FEDERAL GOVERNMENT ABOUT --

17 A. I DON'T.

18 Q. -- YOUR INTAKE CLOSURE?

19 A. I DON'T.

20 MR. RIENZI: IF I CAN JUST HAVE A BRIEF
21 MINUTE, YOUR HONOR.

22 THE COURT: YES.

23 (PAUSE.)

24 THE COURT: COUNSEL, HOW LONG WILL YOU
25 BE? WE NEED TO TAKE A BREAK.

1 MR. RIENZI: YOUR HONOR, CAN WE TAKE A
2 VERY SHORT BREAK HOWEVER LONG YOU WANT, AND I WILL BE
3 READY BY THE TIME YOU SAY WE SHOULD GO.

4 THE COURT: WE WILL TAKE A FIVE MINUTE
5 RECESS.

6 MR. RIENZI: THANK YOU, YOUR HONOR.

7 THE CLERK: ALL RISE.

8 (BREAK TAKEN.)

9 THE COURT: YOU MAY BE SEATED. GOOD
10 AFTERNOON, COUNSEL. YOU CAN CONTINUE.

11 MR. RIENZI: THANK YOU, YOUR HONOR.

12 BY MR. RIENZI:

13 Q. MS. FIGUEROA, EARLIER YOU SAID THAT YOU THOUGHT
14 CATHOLIC VIOLATED THE CONTRACT AND YOU REFERRED TO THE
15 FAIR PRACTICES ORDINANCE PORTION OF THE CONTRACT. DO
16 YOU RECALL THAT?

17 A. THEY DIDN'T COMPLY WITH THE CONTRACT.

18 Q. YES. AND YOU SAID ONE OF THE PORTIONS YOU
19 BELIEVE THEY DID NOT COMPLY WITH IS THE FAIR PRACTICES
20 ORDINANCE PART OF THE CONTRACT, IS THAT CORRECT?

21 A. YES, THAT'S RIGHT.

22 Q. CAN I DIRECT YOUR ATTENTION --

23 MR. RIENZI: MAY I APPROACH, YOUR HONOR?

24 THE COURT: YES.

25 BY MR. RIENZI:

1 Q. I JUST DON'T KNOW WHAT EXHIBIT NUMBER THE
2 CONTRACT IS. SO PAGE 97 OF EXHIBIT 15, PLEASE. I WOULD
3 PARTICULARLY LIKE TO DIRECT YOUR ATTENTION TO PARAGRAPH
4 15.1.

5 A. YES.

6 Q. AND JUST ASK, IS THAT THE PROVISION YOU HAD IN
7 MIND WHEN YOU TESTIFIED EARLIER?

8 MR. FIELD: OBJECTION TO THE EXTENT IT
9 CALLS FOR A LEGAL CONCLUSION.

10 THE COURT: OVERRULED.

11 THE WITNESS: I'M SORRY.

12 BY MR. RIENZI:

13 Q. IS 15.1 THE PROVISION YOU HAD IN MIND EARLIER
14 WHEN YOU SAID CATHOLIC HAD VIOLATED THE FAIR PRACTICES
15 PORTION OF THE CONTRACT?

16 MR. FIELD: OBJECTION. IT
17 MISCHARACTERIZES THE WITNESS'S TESTIMONY. I DON'T
18 BELIEVE SHE SAID SHE HAD A SPECIFIC PROVISION IN MIND,
19 YOUR HONOR.

20 THE COURT: WELL, THE QUESTION IS, IS
21 THAT THE PROVISION?

22 THE WITNESS: 15.1 REFERENCES THE FAIR
23 PRACTICES ORDINANCE.

24 BY MR. RIENZI:

25 Q. IS THAT THE PROVISION YOU HAD IN MIND WHEN YOU

1 SAID THAT YOU THOUGHT THEY VIOLATED THE FAIR PRACTICES
2 PORTION OF THE CONTRACT?

3 A. THIS IS ONE REFERENCE TO THE NONDISCRIMINATION
4 FAIR PRACTICE.

5 Q. YOU DON'T KNOW EITHER WAY WHETHER THIS IS THE
6 PROVISION YOU HAD IN MIND?

7 A. I THINK WE VISITED THE FACT THAT THIS IS A VERY
8 LONG DOCUMENT AND SO WITHOUT GOING INTO EVERY SINGLE
9 PAGE WHERE ELSE IT'S REFERENCED I CANNOT CITE RIGHT NOW.

10 Q. BUT YOU DON'T KNOW ANY OTHER ONE THAT YOU WERE
11 THINKING OF BEFORE?

12 A. THAT'S NOT WHAT I SAID.

13 Q. I'M SORRY. I AM JUST TRYING TO GET A SENSE OF
14 WHAT YOU WERE THINKING OF WHEN YOU TOLD ME THAT THEY
15 VIOLATED THE FAIR PRACTICES PORTION OF THE CONTRACT.

16 A. THAT'S THE FAIR PRACTICE ORDINANCE ITSELF, AND I
17 ALSO REFERENCED TO THE SERVICES PORTION OF THEIR
18 CONTRACT AND THE DEFINITION OF SERVICES.

19 Q. NOTHING ELSE THAT YOU CAN THINK OF?

20 A. AS IT RELATES TO WHAT?

21 Q. AS IT RELATES TO YOUR CLAIM THAT CATHOLIC
22 VIOLATED THE CONTRACT.

23 A. I DON'T THINK THAT'S ACTUALLY WHAT I SAID. I
24 SAID THAT -- IF WE ARE TALKING ABOUT INTAKE CLOSURE OR
25 IN TERMS OF THE MAKING OF THIS DECISION. COULD YOU BE

1 MORE CLEAR?

2 Q. WE ARE TALKING ABOUT YOUR CLAIM EARLIER THAT
3 CATHOLIC VIOLATED THE CONTRACT.

4 A. I DIDN'T USE THE TERM. I SAID THAT THEY WERE --
5 INABILITY TO COMPLY, AND I SAID THAT IT WAS CLEAR THAT
6 THEY COULD BE VIOLATING.

7 Q. SO YOU ARE NOT SURE WHETHER YOU THINK CATHOLIC
8 HAS VIOLATED THIS CONTRACT YET?

9 A. WELL, THEY HAVE ISSUED STATEMENTS CLEARLY THEIR
10 POSITION.

11 Q. BUT IT'S POSSIBLE THEY HAVE NOT VIOLATED THE
12 CONTRACT YET?

13 MR. FIELD: OBJECTION TO THE EXTENT IT
14 CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

15 THE COURT: SUSTAINED.

16 BY MR. RIENZI:

17 Q. IS YOUR TESTIMONY THAT THEY HAVE VIOLATED IT OR
18 THAT THEY MIGHT VIOLATE THE CONTRACT?

19 A. ARE YOU ASKING MY OPINION AS OF RIGHT NOW OR ARE
20 YOU ASKING YOU ME MY OPINION AS IT RELATES TO CLOSING
21 INTAKE?

22 Q. AS IT RELATES TO CLOSING INTAKE. WAS YOUR
23 OPINION THAT THEY HAD VIOLATED THE CONTRACT OR MIGHT
24 VIOLATE THE CONTRACT?

25 A. WHEN I CLOSED INTAKE IT WAS THAT THEY MAY HAVE

1 VIOLATED THEIR CONTRACT.

2 Q. AND HAVE YOU COME TO THE VIEW OR HAVE YOU COME
3 TO A VIEW AS TO WHETHER THE FAILURE TO DO HOME STUDIES
4 FOR SAME-SEX COUPLES THAT YOU CITED EARLIER IS A
5 VIOLATION OF THE CONTRACT?

6 MR. FIELD: OBJECTION, TO THE EXTENT IT
7 CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

8 THE COURT: SUSTAINED.
9 BY MR. RIENZI:

10 Q. DO YOU HAVE A VIEW TODAY AS TO WHETHER
11 CATHOLIC'S POSITION ON NOT DOING HOME STUDIES FOR
12 SAME-SEX COUPLES IS A VIOLATION --

13 MR. FIELD: OBJECTION, TO THE EXTENT IT
14 CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

15 THE COURT: SUSTAINED.

16 MR. RIENZI: YOUR HONOR, SHE SIGNED THIS
17 CONTRACT. I AM JUST ASKING HER WHETHER SHE THINKS IT
18 HAS BEEN VIOLATED OR MIGHT BE VIOLATED. THOSE ARE TWO
19 VERY DIFFERENT THINGS, AND SHE IS THE SIGNER OF THE
20 CONTRACT.

21 MR. FIELD: YOUR HONOR, HE CAN ASK HER
22 ABOUT HER VIEW OF HOME STUDIES AND CATHOLIC'S
23 OBLIGATION, BUT HE'S ASKING FOR A LEGAL DETERMINATION
24 UNDER THE CONTRACT, WHICH SPEAKS FOR ITSELF.

25 THE COURT: SUSTAINED.

1 BY MR. RIENZI:

2 Q. DOES DHS HAVE A POSITION ABOUT WHETHER CATHOLIC
3 HAS VIOLATED THIS CONTRACT IN REGARDS TO HOME STUDIES
4 FOR SAME-SEX PARENTS?

5 MR. FIELD: SAME OBJECTION, YOUR HONOR.

6 THE COURT: SUSTAINED.

7 BY MR. RIENZI:

8 Q. DO YOU UNDERSTAND UNDER THIS CONTRACT THAT THE
9 FAIR PRACTICES ORDINANCE ONLY APPLIES IF FOSTER CARE IS
10 A PUBLIC ACCOMMODATION?

11 MR. FIELD: OBJECTION, TO THE EXTENT IT
12 CALLS FOR A LEGAL CONCLUSION, YOUR HONOR.

13 THE COURT: YES, SUSTAINED.

14 BY MR. RIENZI:

15 Q. DO YOU UNDERSTAND THAT THE DIRECT PROHIBITION OF
16 DISCRIMINATION, 15.1, ONLY APPLIES TO RACE, COLOR,
17 RELIGION AND NATIONAL ORIGIN?

18 MR. FIELD: OBJECTION, CALLS FOR A LEGAL
19 CONCLUSION, YOUR HONOR.

20 THE COURT: SUSTAINED.

21 MR. RIENZI: YOUR HONOR, IF I MAY ARGUE
22 THE POINT FOR A MOMENT.

23 THE COURT: NO.

24 BY MR. RIENZI:

25 Q. MS. FIGUEROA, YOU TESTIFIED EARLIER THAT THE CRU

1 REFERRAL PROCESS -- STRIKE THAT.

2 YOU TESTIFIED EARLIER, I BELIEVE, THAT
3 THERE HAS BEEN NO IMPACT ON THE CRU REFERRAL PROCESS
4 FROM THE CLOSURE OF INTAKE, IS THAT CORRECT?

5 MR. FIELD: OBJECTION, MISCHARACTERIZES
6 THE WITNESS'S TESTIMONY.

7 THE COURT: OVERRULED. SHE CAN ANSWER.

8 THE WITNESS: I DON'T BELIEVE THAT'S WHAT
9 I SAID.

10 BY MR. RIENZI:

11 Q. HAS THE INTAKE CLOSURE MADE IT MORE DIFFICULT
12 FOR CRU TO PLACE CHILDREN WITH FAMILIES THROUGH
13 CATHOLIC?

14 A. NO.

15 Q. AND YOUR REASON FOR SAYING NO IS THAT YOU HAVE
16 SET UP A PROCESS BY WHICH PEOPLE CAN ASK DHS TO MAKE
17 EXCEPTIONS, IS THAT CORRECT?

18 MR. FIELD: OBJECTION, YOUR HONOR. IF I
19 CAN JUST ASK FOR A CLARIFICATION IF COUNSEL IS TALKING
20 ABOUT CATHOLIC CUA OR CATHOLIC SOCIAL SERVICES.

21 MR. RIENZI: CATHOLIC SOCIAL SERVICES.

22 THE COURT: OKAY. YOU MAY ANSWER.

23 THE WITNESS: CAN YOU REPEAT THE
24 QUESTION.

25 BY MR. RIENZI:

1 Q. SURE. YOU HAVE CLOSED INTAKE AT CATHOLIC SOCIAL
2 SERVICES, CORRECT?

3 A. FOSTER CARE.

4 Q. FOSTER CARE INTAKE AT CATHOLIC SOCIAL SERVICES,
5 CORRECT?

6 A. THAT'S CORRECT.

7 Q. AND I BELIEVE YOUR TESTIMONY IS THAT THERE HAS
8 BEEN NO IMPACT ON THE ABILITY OF THE CRU TO PLACE
9 CHILDREN IN FAMILIES WORKING WITH CATHOLIC, IS THAT
10 CORRECT?

11 A. NO. I DON'T UNDERSTAND THE LAST PART OF YOUR
12 QUESTION.

13 Q. THE CLOSURE OF INTAKE MAKES IT HARDER TO PLACE
14 CHILDREN IN FAMILIES THROUGH CATHOLIC, CORRECT?

15 A. THE CLOSURE OF INTAKE MAKES IT HARDER FOR CRU?

16 Q. YES.

17 A. NO.

18 Q. WHY DO YOU SAY NO?

19 A. BECAUSE WE HAVE NOT SEEN AN IMPACT IN OUR NUMBER
20 OF AVAILABILITY OR THE IMPACT IT'S HAD ON CONGREGATE
21 CARE OR THE USE OF THE CHILD CARE ROOM.

22 Q. WHEN YOU'VE PLACED CHILDREN AT CATHOLIC DURING
23 THE CLOSURE OF INTAKE, THAT HAS NOT BEEN THROUGH THE
24 NORMAL CRU REFERRAL PROCESS, HAS IT?

25 MR. FIELD: OBJECTION TO THE

1 CHARACTERIZATION OF THE NORMAL PROCESS, YOUR HONOR.

2 THE COURT: OVERRULED.

3 THE WITNESS: REPEAT THE QUESTION.

4 BY MR. RIENZI:

5 Q. WHEN YOU HAVE PLACED CHILDREN IN FAMILIES
6 THROUGH CATHOLIC DURING THE INTAKE CLOSURE, THAT HAS NOT
7 OCCURRED THROUGH THE USUAL CRU REFERRAL PROCESS,
8 CORRECT?

9 A. DO YOU MEAN IN TERMS OF HAVING A WAIVER OR AN
10 EXCEPTION RELATED TO SPECIAL CASES?

11 Q. I WOULD LIKE YOU TO COMPARE WHAT IT WAS LIKE
12 BEFORE THE INTAKE CLOSURE TO WHAT IT IS LIKE NOW.

13 A. I AM NOT SURE WHAT YOU ARE ASKING ME TO COMPARE.

14 Q. BEFORE THE INTAKE CLOSURE DID YOU OR MS. ALI
15 NEED TO BE CONSULTED EVERY TIME A CHILD WOULD BE PLACED
16 WITH CATHOLIC?

17 A. WE'RE CONSULTED EVERY TIME THERE IS A CONGREGATE
18 CARE PLACEMENT, YES.

19 Q. DID YOU AND MS. ALI NEED TO BE CONSULTED EVERY
20 TIME THERE WAS A PLACEMENT WITH CATHOLIC BEFORE INTAKE
21 CLOSURE?

22 A. NOT EVERY TIME.

23 Q. AFTER THE INTAKE CLOSURE YOU OR MS. ALI MUST BE
24 CONTACTED EVERY TIME THERE IS A PLACEMENT WITH CATHOLIC,
25 CORRECT?

1 A. THAT'S CORRECT, ALONG WITH OTHER PROVIDERS THAT
2 HAVE THEIR INTAKE CLOSED.

3 Q. WHO ELSE HAS THEIR INTAKE CLOSED?

4 A. CAN WE PUBLICLY SAY THAT, SINCE THERE'S -- I
5 MEAN, THAT'S NOT SOMETHING WE -- I AM JUST ASKING.

6 Q. I DON'T KNOW THE ANSWER TO THAT. I AM HAPPY TO
7 --

8 MR. FIELD: YOUR HONOR, CAN WE HAVE A
9 MINUTE?

10 MR. RIENZI: LET ME ASK A MORE GENERAL
11 QUESTION TO SEE IF I CAN --
12 BY MR. RIENZI:

13 Q. YOU HAVE ALREADY MENTIONED BETHANY AS HAVING AN
14 INTAKE CLOSURE, WHICH I BELIEVE IS A PUBLICLY KNOWN
15 FACT, CORRECT?

16 A. THAT'S CORRECT, AND THERE IS, I BELIEVE, AT
17 LEAST TWO TO THREE OTHER ORGANIZATIONS RIGHT NOW THAT
18 HAVE THEIR INTAKE CLOSED.

19 Q. THANK YOU.

20 YOU SPOKE BEFORE ABOUT A WAIVER OR
21 EXCEPTIONS POLICY, CORRECT?

22 A. PRACTICE, YES.

23 Q. OKAY. IS THERE ANY WRITTEN POLICY THAT GOVERNS
24 HOW THAT PRACTICE WORKS?

25 A. NO.

1 Q. HOW DOES THAT PROCESS WORK?

2 A. PRACTICE OR PROCESS -- PRACTICE?

3 Q. HOW DOES YOUR WAIVER OR EXCEPTIONS PRACTICE
4 WORK?

5 A. WE RIGHT NOW ARE GENERALLY NOTIFIED DIRECTLY BY
6 THE -- EITHER THE ON-CALL DIRECTOR IF IT'S DURING THE
7 DAY. IF IT'S A STAFF MEMBER THE CRU ELEVATES IT THROUGH
8 -- TO MY E-MAIL AS WELL AS TO COMMISSIONER ALI.

9 Q. BUT YOU DON'T HAVE ANY WRITTEN POLICY THAT
10 GOVERNS HOW YOU DECIDE WHETHER TO MAKE AN EXCEPTION?

11 A. THERE ARE A NUMBER OF THINGS THAT WE DO IN
12 PRACTICE THAT WE DON'T HAVE A SPECIFIC POLICY FOR.

13 Q. AND THIS IS ONE OF THEM. YOU DO NOT HAVE A
14 WRITTEN POLICY ON THIS.

15 A. THAT'S CORRECT, YES.

16 Q. YOU JUST MAKE INDIVIDUALIZED ASSESSMENTS OF WHAT
17 IS THE RIGHT THING TO DO IN A PARTICULAR CIRCUMSTANCE.
18 IS THAT FAIR?

19 A. IT'S FAIR TO SAY THAT WE TREAT EACH CHILD
20 INDIVIDUALLY, YES.

21 Q. AND FOR THIS EXCEPTIONS PROCESS YOU MAKE
22 INDIVIDUALIZED ASSESSMENTS, CORRECT?

23 A. THAT'S CORRECT.

24 Q. YOU HAVE NEVER COMMUNICATED YOUR WAIVER POLICY
25 TO -- STRIKE THAT.

1 YOU HAVE NEVER COMMUNICATED YOUR WAIVER
2 POLICY IN WRITING TO THE VARIOUS CUA'S, CORRECT?

3 A. THERE WAS AN E-MAIL SENT BY MS. ALI INFORMING
4 THEM REGARDING THE INSURANCE THAT CRU HAD TO DO ALL OF
5 THE PLACEMENTS.

6 Q. AND -- I'M SORRY. IS YOUR TESTIMONY THAT THAT
7 E-MAIL INFORMED THEM -- AND I DON'T MEAN TO MAKE YOU
8 GUESS. WOULD YOU LIKE ME TO GET THE E-MAIL?

9 A. NO. YOU GUYS ENTERED IT INTO EVIDENCE YESTERDAY
10 WITH THE E-MAIL THAT WAS SENT FROM STACY BOYD FOR THE
11 DIRECTION OF MS. ALI TO THE CUA LEADERSHIP.

12 Q. RIGHT. WE ARE TALKING ABOUT THE SAME E-MAIL.
13 AT A CERTAIN POINT IF YOU NEED TO SEE IT, LET ME KNOW.
14 I DON'T WANT TO -- IT'S NOT QUIZZING YOUR MEMORY.

15 A. SURE.

16 Q. THAT E-MAIL SAID NOTHING ABOUT AN EXCEPTIONS
17 POLICY, CORRECT?

18 A. I THINK -- ACTUALLY, IF WE ARE GOING TO TALK
19 SPECIFICALLY ABOUT THE E-MAIL, I WOULD LIKE A COPY.

20 Q. SURE. THIS HAS BEEN PREVIOUSLY MARKED AS AN
21 EXHIBIT. I DON'T KNOW THE NUMBER.

22 MR. FIELD: IT'S EXHIBIT 3.

23 BY MR. RIENZI:

24 Q. AND MS. FIGUEROA, IS THIS THE E-MAIL THAT YOU
25 AND I WERE TALKING ABOUT A MOMENT AGO?

1 A. THIS IS, YES.

2 Q. THIS E-MAIL DOES NOT INFORM CUA LEADERSHIP ABOUT

3 THE AVAILABILITY OF EXCEPTIONS, CORRECT?

4 A. IT SAYS IF YOU HAVE QUESTIONS ABOUT A CASE,

5 PLEASE CONTACT ME BY PHONE OR E-MAIL.

6 Q. IT DOESN'T SAY ANY EXCEPTIONS WILL BE GRANTED,

7 CORRECT?

8 A. IT SAYS IF YOU HAVE A QUESTION --

9 Q. I AGREE.

10 A. -- ABOUT A CASE.

11 Q. IT DOES NOT SAY EXCEPTIONS WILL BE GRANTED,

12 CORRECT?

13 A. NO, IT DOES NOT SAY THAT.

14 Q. IT DOES NOT INFORM THEM ON WHAT BASIS YOU MIGHT

15 MAKE AN EXCEPTION, CORRECT?

16 A. NO, IT DOES NOT.

17 Q. AND YOU HAVE NO WAY OF KNOWING WHETHER YOUR

18 OFFICE IS ACTUALLY BEING NOTIFIED OF ALL THE SITUATIONS

19 IN WHICH, FOR EXAMPLE, THERE COULD BE A SIBLING

20 PLACEMENT, CORRECT?

21 A. I AM NOT SURE IF THAT'S ACCURATE. THERE'S A LOT

22 OF COMMUNICATION THAT HAPPENS VERBALLY WITH OUR CUA'S

23 THROUGH BOTH THE DIRECTOR AND SUPERVISORY MEETINGS. SO

24 WE TALK ABOUT PLACEMENT DISRUPTIONS PRETTY SIGNIFICANTLY

25 WITH OUR CUA'S.

1 Q. AS YOU SIT HERE UNDER OATH, YOU DON'T KNOW
2 EITHER WAY WHETHER YOUR OFFICE GETS TOLD ABOUT ALL OF
3 THE POSSIBLE SIBLING PLACEMENTS, CORRECT? YOU JUST
4 DON'T KNOW?

5 A. TRUE.

6 Q. AND YOU DON'T KNOW IF YOU FIND OUT ABOUT ALL OF
7 THE SITUATIONS WHERE THERE IS A PRIOR FOSTER CARE PARENT
8 AS WITH DOE CHILD NUMBER 1, CORRECT?

9 MR. FIELD: OBJECTION, TO THE EXTENT THAT
10 IT CHARACTERIZES DOE CHILD NUMBER 1 PLACEMENT.

11 THE COURT: I AM GOING TO SUSTAIN THE
12 OBJECTION.

13 BY MR. RIENZI:

14 Q. YOU SAID EARLIER THAT YOU HAD OFFERED CATHOLIC
15 THE ABILITY TO ENTER INTO THE SAME FULL CONTRACT. IS
16 THAT WHAT YOU SAID?

17 A. I SAID WE OFFER THEM OPPORTUNITY TO ENTER INTO A
18 FULL CONTRACT.

19 Q. IT'S NOT THE SAME FULL CONTRACT THAT THEY HAVE
20 PREVIOUSLY ENTERED INTO?

21 A. FOR THE SAME SERVICES?

22 Q. YES. IN OTHER WORDS, YOU WOULD BE CHANGING --

23 A. IT IS FOR THE SAME SERVICES.

24 Q. I AM GOING TO HAND YOU A DOCUMENT WHICH HAS
25 PREVIOUSLY BEEN MARKED AS PLAINTIFF'S EXHIBIT 13. AND

1 THAT'S A LETTER FROM THE LAW DEPARTMENT, WHO ARE YOUR
2 LAWYERS IN THIS CASE, CORRECT?

3 A. YES. THIS IS THE LETTER PRIOR TO SENDING THE
4 AWARD LETTER. SO THIS IS DATED IN REGARDS TO THE LINE
5 OF QUESTIONS YOU ARE ASKING ME.

6 Q. I WOULD LIKE TO TURN TO PAGE 2 OF THAT DOCUMENT,
7 PLEASE. IN THE THIRD FULL PARAGRAPH FROM THE TOP, THE
8 LAST SENTENCE OF THAT PARAGRAPH READS: WE BELIEVE OUR
9 CURRENT CONTRACT WITH CSS IS QUITE CLEAR THAT THIS IS
10 ALL RIGHT.

11 A. DID YOU SAY SECOND OR THIRD PARAGRAPH?

12 Q. THIRD PARAGRAPH FROM THE TOP, SECOND PAGE, THIRD
13 PARAGRAPH FROM THE TOP. THE PARAGRAPH BEGINS "PLEASE
14 ALSO NOTE."

15 A. SORRY, THAT'S PAGE 3.

16 Q. I APOLOGIZE. SORRY ABOUT THAT.

17 A. GO AHEAD. SORRY.

18 Q. THE LAST SENTENCE OF THE THIRD PARAGRAPH READS:
19 WE BELIEVE OUR CURRENT CONTRACT WITH CSS IS QUITE CLEAR
20 THAT THIS IS ALL RIGHT, BUT PLEASE BE ADVISED THAT ANY
21 FURTHER CONTRACTS WITH CSS WILL BE EXPLICIT IN THIS
22 REGARD. DO YOU SEE THAT?

23 A. I DO.

24 Q. AND ANY FUTURE CONTRACT THAT YOU ENTER INTO WITH
25 CSS YOU HAVE TOLD CSS YOU PLAN TO HAVE A MORE EXPLICIT

1 DISCRIMINATION POLICY IN THAT CONTRACT, CORRECT?

2 A. THE CLARITY REGARDING THE POLICY WILL BE MADE
3 AVAILABLE TO ALL CONTRACTED PROVIDERS, NOT JUST CSS.

4 Q. AND WHEN YOU SAID BETHANY IS GOING TO ENTER INTO
5 A NEW CONTRACT, THAT NEW CONTRACT IS NOT THE SAME AS
6 THEIR OLD CONTRACT, IS IT?

7 A. IT IS THE SAME CONTRACT WITH EXPLICIT LANGUAGE
8 DEFINING THE EXPECTATIONS.

9 Q. SO IT'S THE SAME, BUT WITH DIFFERENT LANGUAGE ON
10 THE KEY ISSUE, CORRECT?

11 MR. FIELD: OBJECTION TO THE REFERENCE
12 "KEY ISSUE," YOUR HONOR.

13 THE COURT: SUSTAINED.

14 BY MR. RIENZI:

15 Q. IT'S THE SAME WITH DIFFERENT LANGUAGE THAT IS
16 BEING CHANGED IN ORDER TO MORE DIRECTLY ADDRESS THE
17 QUESTION OF HOME STUDIES FOR SAME-SEX FOSTER COUPLES,
18 CORRECT?

19 A. CAN YOU REPEAT THAT?

20 Q. SURE. I AM TRYING TO FIGURE OUT THE CONTRACT
21 THAT YOU WERE SAYING BEFORE THAT DHS WOULD GIVE CATHOLIC
22 IS THE SAME FULL CONTRACT THEY HAD BEFORE OR IS A
23 CHANGED CONTRACT ON THE NONDISCRIMINATION ISSUE?

24 A. I DON'T HAVE THE CONTRACT IN FRONT OF ME, BUT
25 JUST TO REPEAT WHAT WAS SHARED WITH CATHOLIC SOCIAL

1 SERVICES, IT WOULD BE EXPLICIT IN REGARD, IN TERMS TO
2 WHAT IS REQUIRED.

3 Q. THE CURRENT CONTRACT IS NOT EXPLICIT, CORRECT?

4 A. I BELIEVE RIGHT, IT MEANS PROVIDING FURTHER
5 CLARITY.

6 Q. IN THE PAST YOU HAVE FREQUENTLY LET AGENCIES
7 CONTINUE FOR MONTHS AFTER THE EXPIRATION OF A CONTRACT,
8 IS THAT CORRECT?

9 A. WHEN THERE IS A RENEWAL EXPECTED AND IT'S BEEN
10 CLEARED BY BOTH THE PROVIDER AND THE CITY THAT THE
11 EXPECTATION IS TO MOVE FORWARD IN COMPLIANCE WITH THAT
12 CONTRACT, YES.

13 Q. AND IN THOSE SITUATIONS SOMETIMES YOU OPERATE
14 FOR MONTHS UNDER THE OLD CONTRACT?

15 A. THAT IS CORRECT.

16 MR. FIELD: THAT CALLS FOR A LEGAL
17 CONCLUSION, YOUR HONOR.

18 THE COURT: OVERRULED.

19 BY MR. RIENZI:

20 Q. YOU TALKED EARLIER ABOUT POSSIBLY CHANGING
21 CONTRACT TERMS TO SHIFT FROM PER DIEM TO COST
22 REIMBURSEMENT. DO YOU RECALL THAT TESTIMONY?

23 A. THAT WAS AN EXAMPLE WHAT WE DID WITH A PROVIDER
24 THAT WAS CLOSING, YES.

25 Q. IN THAT CIRCUMSTANCE YOU ARE NOT DOING ANY NEW

1 REFERRALS, IS THAT CORRECT?

2 A. THAT'S CORRECT.

3 MR. RIENZI: MY LAST QUESTION AND I WANT
4 TO MAKE ONE PROFFER, ONE LAST DOCUMENT, YOUR HONOR.
5 BY MR. RIENZI:

6 Q. MY LAST QUESTION, THOUGH, IS, I BELIEVE WE
7 TALKED BEFORE ABOUT WHETHER YOU SPOKE WITH THE MAYOR.
8 AND I JUST WANT TO BE CLEAR. HAVE YOU HAD ANY
9 CONVERSATIONS WITH ANYONE IN THE MAYOR'S OFFICE ABOUT
10 WHETHER THIS CONFLICT WITH THE ARCHDIOCESE IS
11 POLITICALLY USEFUL?

12 MR. FIELD: OBJECTION TO THE SCOPE OF THE
13 QUESTION, YOUR HONOR.

14 THE COURT: YES, SUSTAINED.

15 MR. RIENZI: YOUR HONOR, MY ONE PROFFER.
16 THERE IS ONE ADDITIONAL MAYOR KENNEY TWEET THAT I JUST
17 WANT TO MAKE THE PROFFER ON. I UNDERSTAND THAT IT WILL
18 ALMOST CERTAINLY BE COVERED BY YOUR PRIOR RULING. MAY I
19 JUST MAKE THE OFFER OUT LOUD?

20 THE COURT: YES.

21 MR. RIENZI: IT'S A APRIL 9, 2015 TWEET
22 BY MAYOR KENNEY AT JIM F. KENNEY. IT SAYS: LOVE THIS,
23 HASHTAG PHILADELPHIA COUNCIL, INVITE ALL AFFECTED BY
24 RFRA LAWS TO CITY OF BROTHERLY LOVE, RANKED THE NUMBER
25 ONE HASHTAG LGBT FRIENDLY BY HRC.

1 AND MY ARGUMENT WOULD SIMPLY BE THIS, IS
2 MS. FIGUEROA'S BOSS DEMONSTRATING THAT HE DOES NOT LIKE
3 RELIGIOUS FREEDOM LAWS VERY MUCH.

4 THE COURT: OKAY, IF THAT'S YOUR
5 ARGUMENT.

6 MR. RIENZI: I HAVE PUT IT IN THE RECORD,
7 AND I AM DONE.

8 THANK YOU VERY MUCH, MS. FIGUEROA.

9 THE COURT: OKAY. ANY REDIRECT?

10 MR. FIELD: JUST A FEW QUESTIONS, YOUR
11 HONOR.

12 REDIRECT EXAMINATION

13 BY MR. FIELD:

14 Q. COMMISSIONER FIGUEROA, I WILL TRY AND BE BRIEF.
15 WHEN YOU STARTED YOUR TESTIMONY TWO DAYS AGO NOW, YOU
16 TALKED ABOUT THE JESUIT -- YOU WORKED FOR THE JESUIT
17 VOLUNTEER CORPS IN YOUR FAITH. JUST TO CLARIFY FOR THE
18 RECORD, IF YOU ARE COMFORTABLE, WOULD YOU MIND
19 SPECIFYING YOUR RELIGIOUS FAITH?

20 A. SURE. I AM CATHOLIC. I HAVE BEEN BORN AND
21 RAISED CATHOLIC AND I PRACTICE AS A CATHOLIC AND JESUITS
22 ARE AN ORDER, A DENOMINATION OF PRIESTHOOD.

23 Q. THANK YOU.

24 IF YOU COULD TURN FOR A MOMENT TO THE
25 EXHIBIT THAT HAS BEEN ENTERED AS P 13. COUNSEL WAS JUST

1 SHOWING IT TO YOU. THIS IS THE LETTER --

2 A. THIS ONE, YES. IT WAS NOT MARKED. I'M SORRY,
3 THIS ONE?

4 Q. YES.

5 MR. FIELD: AND I BELIEVE, COUNSEL, THIS
6 WAS ENTERED AS P 13 FROM YESTERDAY?

7 MR. RIENZI: I BELIEVE SO.

8 MR. FIELD: THANK YOU.

9 BY MR. FIELD:

10 Q. I WILL REPRESENT IT IS EXHIBIT P 13. IT'S A
11 LETTER DATED MAY 7TH TO MARK RIENZI, COUNSEL HERE, FROM
12 VALERIE ROBINSON, CHAIR OF CORPORATE AND TAX GROUP. IS
13 MS. ROBINSON ONE OF YOUR COUNSEL WITH THE CITY?

14 A. YES.

15 Q. AND WERE YOU CONSULTED IN AND INVOLVED IN THIS
16 LETTER?

17 A. YES. THE LAW DEPARTMENT PREPARED THIS LETTER.

18 Q. YES. THANK YOU. IF YOU CAN TURN BACK TO THE
19 SECOND PAGE THAT MR. RIENZI HAD YOU READING FROM.

20 A. THE SECOND OR THE THIRD?

21 Q. THIRD PAGE, EXCUSE ME.

22 A. JUST MAKING SURE.

23 Q. THERE ARE NO NUMBERS ON THIS ONE. AND THE
24 PARAGRAPH THAT IS FROM THE -- THE FOURTH FROM THE BOTTOM
25 THAT STARTS: FAMILY EQUALITY IS BOTH A LEGAL

1 REQUIREMENT AND AN IMPORTANT CITY POLICY AND VALUE THAT
2 MUST BE EMBODIED IN OUR CONTRACTUAL RELATIONSHIPS.

3 A. UM-HUM.

4 Q. CAN YOU READ ME WHAT IT SAYS, THE LAST PORTION
5 OF THAT PARAGRAPH THAT STARTS "ON A RELATED NOTE."

6 A. ON A RELATED NOTE, CONTRARY TO THE DISCUSSION IN
7 YOUR LETTER REGARDING DHS'S PRACTICES CONCERNING
8 SIBLINGS, BECAUSE THE BEST INTERESTS OF THE CHILDREN IN
9 OUR CARE ARE PARAMOUNT, WE DID RECENTLY GRANT AN
10 EXCEPTION TO CESSATION OF CSS'S REFERRALS IN THAT
11 INSTANCE TO ASSURE THAT SIBLINGS WERE PLACED TOGETHER,
12 AND WE EXPECT THE BEST INTEREST OF CHILDREN WILL REMAIN
13 PARAMOUNT THROUGHOUT ANY TRANSITION.

14 Q. AS DHS COMMISSIONER IN ALL OF THE COMMUNICATIONS
15 YOU ARE INVOLVED IN AND RESPONSIBLE FOR, DO YOU HAVE ANY
16 REASON TO THINK THERE HAS EVER BEEN ANY LACK OF CLARITY
17 ABOUT YOUR DEPARTMENT'S GRANTING EXCEPTIONS IN THE CASES
18 OF KINSHIP AND SIBLINGS?

19 A. NO. I THINK WE HAVE BEEN PRETTY CLEAR.

20 Q. THANK YOU.

21 JUST ONE LAST ISSUE. EARLIER IN YOUR
22 CROSS-EXAM TESTIMONY YOU MENTIONED HEARING NEW TESTIMONY
23 ON TUESDAY FOR THE -- ABOUT AN ISSUE FOR THE FIRST TIME
24 THAT CAUSED YOU SOME CONCERN. WHAT WAS THAT TESTIMONY?

25 A. THE TESTIMONY WAS BY JAMES AMATO, WHO INDICATED

1 THAT THERE HAS TO BE A PASTORAL REFERENCE PROVIDED IN
2 ORDER TO BECOME A FOSTER PARENT WITH CATHOLIC SOCIAL
3 SERVICES.

4 Q. AND WHAT CONCERN DID THAT CAUSE YOU?

5 A. IT'S A VERY SPECIFIC CHURCH PRACTICE THAT HAS TO
6 COME FROM A PASTOR OR A RELIGIOUS LEADER AND CLEARLY
7 CREATES ANOTHER BARRIER THAT IS NOT A REQUIREMENT TO
8 BECOME A FOSTER PARENT.

9 Q. AND DID YOU HEAR MR. AMATO TESTIFY THAT IT
10 DIDN'T -- IT WAS NOT REQUIRED TO ONLY BE A CATHOLIC
11 CHURCH, BUT COULD BE ANY OF A VARIETY OF FORMS OF
12 RELIGIOUS LEADER?

13 A. I DID, BUT I ALSO HEARD THAT WHAT I INTERPRETED
14 AS EASIEST WOULD PROBABLY HAVE A SIGNIFICANT CHALLENGE
15 BEING ABLE TO BECOME A FOSTER PARENT THROUGH CSS, SINCE
16 THERE WOULD BE NO OPPORTUNITY TO GAIN A PASTORAL
17 REFERENCE.

18 Q. AND DID THAT CAUSE YOU CONCERN ABOUT THE CITY'S
19 CONTRACTING WITH CATHOLIC SOCIAL SERVICES?

20 A. IT DOES.

21 MR. FIELD: THANK YOU. NO FURTHER
22 QUESTIONS, YOUR HONOR.

23 THE COURT: OKAY. ANY OTHER QUESTIONS?

24 MR. RIENZI: VERY BRIEFLY.

25 RECROSS EXAMINATION

1 BY MR. RIENZI:

2 Q. MS. FIGUEROA, AS COMMISSIONER OF DHS YOU ARE NOT
3 AWARE OF A SINGLE ACTUAL PERSON WHO HAS SAID THEY WERE
4 UNABLE TO BE CERTIFIED BY CATHOLIC BECAUSE OF A PASTORAL
5 LETTER REQUIREMENT, IS THAT CORRECT?

6 A. NO, I HAVE NOT. I DIDN'T KNOW UNTIL YESTERDAY.

7 Q. DID YOU DISCUSS THE MATTER WITH OTHERS? DID YOU
8 DISCUSS THE MATTER WITH OTHERS AT DHS?

9 A. NO. I WAS NOT ALLOWED TO TALK TO THEM. I WAS
10 UNDER OATH.

11 Q. YOU HAVE GOT GOOD LAWYERS.

12 A. I DO.

13 MR. RIENZI: NOTHING FURTHER, YOUR HONOR.

14 THE COURT: OKAY. ANY OTHER QUESTIONS?

15 MR. FIELD: NOT FOR THIS WITNESS, YOUR

16 HONOR.

17 THE COURT: THANK YOU.

18 THE WITNESS: THANK YOU, JUDGE.

19 THE COURT: YOUR NEXT WITNESS.

20 MS. CORTES: YOUR HONOR, COULD WE ASK FOR
21 LUNCH BRIEFLY.

22 THE COURT: YOU CAN'T EAT.

23 MS. CORTES: AT THIS TIME, YOUR HONOR.

24 ALSO TO BE PERFECTLY HONEST, YOUR HONOR, OUR NEXT

25 PROPOSED WITNESS IS NOT CURRENTLY RIGHT HERE. I THINK

1 WE ASSUMED THAT THERE WAS GOING TO BE A LUNCH BREAK AT
2 THIS TIME. SO I WOULD JUST ASK. I DID ALERT MR. RIENZI
3 OF OUR NEXT WITNESS. I UNDERSTAND THAT HE HAS AN
4 OBJECTION. I DON'T KNOW IF YOUR HONOR WANTS TO ADDRESS
5 THAT NOW OR AFTER LUNCH OR WHATEVER YOUR HONOR'S
6 PREFERENCE IS.

7 MR. RIENZI: YOUR HONOR, CAN I JUST
8 BRIEFLY STATE. I THINK THERE'S ACTUALLY A GOOD REASON
9 TO HAVE A BRIEF DISCUSSION NOW, IF YOU ARE WILLING.

10 THE COURT: OKAY.

11 MR. RIENZI: MY UNDERSTANDING FROM
12 COUNSEL IS THAT THE NEXT WITNESS WILL BE A MR. FRANK
13 CERVONE, WHO IS NOT A WITNESS FOR WHOM THEY SUBMITTED A
14 DECLARATION IN ANY OF THEIR MOVING PAPERS AND WHOM I AM
15 TOLD IS SOMEBODY THAT WISHES TO QUALIFY AS AN EXPERT,
16 SOMEBODY WHO IS NOT DISCLOSED TO US PREVIOUSLY, WHO IS
17 SUPPOSED TO BE AN EXPERT WHO WE DON'T HAVE ANY OF THE
18 EXPERT MATERIALS ON. I THINK IT'S FRANKLY IMPROPER TO
19 GO FORWARD WITH THE WITNESS IN THAT CIRCUMSTANCE. AND
20 SO I WOULD ASK YOUR HONOR IF YOU ARE WILLING TO RULE
21 NOW, I JUST DON'T THINK THEY SHOULD BE INTRODUCING NEW
22 WITNESSES WHO HAVE NOT BEEN PART OF THE PLEADINGS
23 PREVIOUSLY.

24 MS. CORTES: YOUR HONOR, MR. CERVONE WAS
25 TO BE AN AFFIANT IN THE PROPOSED -- IN THE INTERVENOR'S

1 PAPERS. HE IS BEING REPRESENTED BY MS. MARY CATHERINE
2 ROPER FOR THE ACLU. SO HE DID HAVE NOTICE. HE IS PART
3 OF THAT -- OF THOSE PAPERS, YOUR HONOR. I DID PROVIDE
4 COUNSEL WITH MR. CERVONE'S RESUME. THERE IS NO
5 REQUIREMENT UNDER THE FEDERAL RULES THAT REQUIRE US TO
6 PROVIDE THEM WITH SUCH NOTICE. WE ALSO DID NOT HAVE A
7 NOTICE OF ALL OF THEIR WITNESSES FOR TODAY, YOUR HONOR.
8 IF COUNSEL WOULD LIKE TO INTERVIEW MR. CERVONE AHEAD OF
9 TIME WITH MS. ROPER PRESENT THERE IS NO ISSUE FOR OUR
10 SIDE OR FOR MS. ROPER.

11 HIS PROPOSED TESTIMONY WOULD BE VERY
12 RELEVANT TO THESE PROCEEDINGS. HE HAS BEEN A CHILD
13 ADVOCATE IN -- SPECIFICALLY FOR THE CITY AND COUNTY OF
14 PHILADELPHIA FOR THE PAST 40 YEARS. WE HAVE HEARD A LOT
15 OF TESTIMONY -- OR AT LEAST OPPOSING COUNSEL HAS TRIED
16 TO ELICIT A LOT OF TESTIMONY THAT IT'S ONLY ONE SIDE
17 THAT IS GOING TO BE HARMED BY YOUR HONOR NOT GRANTING
18 THIS TRO. MR. CERVONE WOULD PROVIDE YOUR HONOR WITH THE
19 TESTIMONY, THE VERY RELEVANT TESTIMONY FROM HIS
20 EXPERIENCE AS A CHILD ADVOCATE, AS TO WHAT WOULD OCCUR
21 IF YOUR HONOR DOES GRANT THE TRO AND TO THE DEVASTATING
22 EFFECT ON THE CHILDREN AND SPECIFICALLY THE LGBTQ
23 CHILDREN AND ALSO THE LGBTQ SAME-SEX COUPLES AND HIS
24 EXPERIENCE WITHIN THE FOSTER SYSTEM AS A CHILD ADVOCATE.

25 AND EVEN IF YOUR HONOR DOES NOT QUALIFY

1 HIM AS AN EXPERT, I WOULD PROPOSE TO YOUR HONOR THAT HE
2 WOULD STILL BE ALLOWED TO PROVIDE OPINION TESTIMONY ON
3 THAT FRONT. AND AGAIN, WE WOULD ALLOW MR. RIENZI AND
4 HIS ENTIRE TEAM TO QUESTION HIM AHEAD OF TIME AND EVEN
5 TO CONTINUE THE VOIR DIRE IN OPEN COURT BEFORE YOUR
6 HONOR UNTIL YOUR HONOR IS SATISFIED THAT HE IS AN ACTUAL
7 EXPERT IN THIS FIELD.

8 MR. RIENZI: YOUR HONOR, I SIMPLY SAY
9 THAT THE TIME FOR INTRODUCING MR. CERVONE'S TESTIMONY
10 WOULD HAVE BEEN WHEN THEY PRESENTED THEIR ARGUMENTS,
11 THEIR LEGAL ARGUMENTS IN THEIR BRIEFS. AND INTRODUCING
12 THE IDEA OF AN EXPERT TESTIFYING IN THE MIDDLE OF THE
13 DAY TODAY AND PROPOSING THAT I TAKE HIS DEPOSITION OVER
14 LUNCH SEEMS LIKE AN UNFAIR PRACTICE AND EXCEEDINGLY
15 DIFFICULT FOR ANYBODY TO DO. YOU WILL HAVE A CHANCE TO
16 HEAR FROM MR. CERVONE ONCE YOU DECIDE WHETHER OR NOT HE
17 SHOULD BE ABLE TO INTERVENE. HE IS ONE OF THE COUNCIL
18 OF INTERVENORS, APPARENTLY.

19 SO THAT MOTION IS BEFORE YOUR HONOR. OUR
20 OPPOSITION IS DUE NEXT WEEK. YOU HAVE ACCEPTED THEIR
21 BRIEF -- HIS BRIEF AND HIS WRITINGS AS AN AMICUS
22 ALREADY. I REALLY DO NOT THINK IT'S FAIR TO GO DOWN
23 THIS PATH.

24 MS. CORTES: YOUR HONOR, MR. RIENZI CAN
25 ADDRESS THAT PART AS TO -- IT'S MY UNDERSTANDING MR.

1 CERVONE CAN CLARIFY FOR YOUR HONOR THAT HE WILL ACTUALLY
2 WITHDRAW AS COUNSEL, GIVEN THAT HE WOULD BE ALLOWED TO
3 TESTIFY TODAY AS A WITNESS. SO HE WOULD WITHDRAW AS
4 COUNSEL AND MS. ROPER WOULD CONTINUE ALONG WITH THE
5 REPRESENTATION.

6 IS THAT CORRECT, MS. ROPER?

7 MS. ROPER: THAT IS CORRECT, YOUR HONOR.
8 AND OBVIOUSLY AS WE HAVE BEEN PARTICIPATING AS
9 INTERVENORS, WE MIGHT WELL HAVE CALLED HIM OR SOMEONE
10 SIMILAR TO TESTIFY. BUT SINCE WE ARE NOT HERE TO DO
11 THAT, I THINK THE CITY WANTED TO DO THAT. AGAIN, THIS
12 IS NOT OUR FIGHT. I JUST AM HERE TO CLEAR UP ANY
13 QUESTIONS ABOUT HIS RELATIONSHIP WITH RESPECT TO THE
14 INTERVENORS.

15 MS. CORTES: AND YOUR HONOR, TO MR.
16 RIENZI'S POINT AS NOT BEING ABLE TO DEPOSE HIM, WE ARE
17 ON YOUR HONOR'S TRO SCHEDULE. THEY ARE THE ONES THAT
18 HAVE FILED THE TRO/PRELIMINARY INJUNCTION. SO WE ARE
19 ALL ON AN EXPEDITED SCHEDULE. WE WOULD HAVE ALL LOVED
20 TO HAVE HAD THE TIME TO DEPOSE ALL OF THEIR WITNESSES,
21 BUT WE ARE ALL UNDER THIS SCHEDULE. SO NONE OF US WERE
22 ABLE TO DO THAT.

23 THE COURT: OKAY. I AM GOING TO PERMIT
24 THE WITNESS TO TESTIFY. I AM GOING TO RECESS UNTIL
25 1:30. AND IF YOU CALL HIM AND HAVE HIM REPORT BACK, SO

1 THAT HE COULD BE MADE AVAILABLE TO COUNSEL SO THAT WE
2 CAN PROCEED AT 1:30.

3 MS. CORTES: YOUR HONOR, HE HAD A MEETING
4 WITH HIS STAFF STARTING AT 12:30. HE BELIEVED IT WOULD
5 LAST A HALF HOUR. I HAVE ASKED HIM TO RETURN TO COURT
6 AS QUICKLY AS HE POSSIBLY CAN SO HE WILL BE AVAILABLE TO
7 COUNSEL FOR THE PLAINTIFFS.

8 THE COURT: VERY WELL. OKAY. WE WILL
9 RECESS UNTIL 1:30.

10 ALL COUNSEL: THANK YOU, YOUR HONOR.

11 (ALL RISE.)

12 (LUNCH BREAK TAKEN.)

13 THE COURT: GOOD AFTERNOON. YOU MAY BE
14 SEATED. ARE WE READY TO PROCEED?

15 MS. CORTES: YES, YOUR HONOR.

16 MR. RIENZI: YES, YOUR HONOR.

17 THE COURT: CALL YOUR WITNESS.

18 MS. CORTES: DEFENDANTS CALL FRANK
19 CERVONE TO THE STAND.

20 THE CLERK: PLEASE REMAIN STANDING AND
21 RAISE YOUR RIGHT HAND.

22 (WITNESS SWORN.)

23 THE CLERK: CAN YOU STATE AND SPELL YOUR
24 NAME FOR THE RECORD, PLEASE?

25 THE WITNESS: FRANK CERVONE, C-E-R-V AS

1 IN VICTOR, O-N-E.

2 THE COURT: GOOD AFTERNOON.

3 THE WITNESS: GOOD AFTERNOON.

4 MS. CORTES: MAY I PROCEED, YOUR HONOR?

5 THE COURT: YES.

6 DIRECT EXAMINATION - QUALIFICATIONS

7 BY MS. CORTES:

8 Q. GOOD AFTERNOON, MR. CERVONE. CAN YOU PLEASE
9 TELL HER HONOR WHERE YOU WENT TO SCHOOL?

10 A. COLLEGE?

11 Q. YOU CAN START WITH COLLEGE AND YOU CAN WORK YOUR
12 WAY UP.

13 A. UNIVERSITY OF PENNSYLVANIA FOR UNDERGRAD,
14 VILLANOVA LAW SCHOOL, AND LASALLE UNIVERSITY FOR A
15 MASTER'S DEGREE IN THEOLOGY.

16 Q. CAN YOU TELL HER HONOR WHAT IS IT THAT YOU DID
17 IMMEDIATELY AFTER LAW SCHOOL?

18 A. CAREER-WISE?

19 Q. YES.

20 A. SO I SERVED FOR A YEAR AS A STAFF ATTORNEY AT
21 DELAWARE COUNTY LEGAL ASSISTANCE ASSOCIATION, A LEGAL
22 AID PROGRAM, WORKING WITH LAW STUDENTS AS AN ADJUNCT
23 CLINICAL PROFESSOR FROM VILLANOVA. I THEN MOVED ON TO
24 SAINT GABRIEL'S SYSTEM, WHICH IS A RESIDENTIAL -- A
25 PROGRAM FOR RESIDENTIAL TREATMENT AND DAY TREATMENT

1 PROGRAMS FOR DELINQUENT BOYS RUN BY THE CATHOLIC SOCIAL
2 SERVICES, THE ARCHDIOCESE OF PHILADELPHIA, WHERE I WAS A
3 TEACHER AND A LAWYER AND A CHRISTIAN BROTHER, A MEMBER
4 OF THE RELIGIOUS COMMUNITY.

5 Q. AND THEN JUST GOING BACK TO YOUR EXPERIENCE AS
6 AN ADJUNCT PROFESSOR AT VILLANOVA, CAN YOU TELL HER
7 HONOR EXACTLY WHAT IT IS YOU DID AS AN ADJUNCT PROFESSOR
8 THERE?

9 A. SO WE RAN A -- THE DELAWARE COUNTY LEGAL
10 ASSISTANCE ESSENTIALLY HAD A CONTRACT OF SOME SORT WITH
11 VILLANOVA LAW SCHOOL. THESE ARE IN SOMEWHAT THE EARLY
12 DAYS OF CLINICAL EDUCATION AND SO THE LAW SCHOOL
13 OUTSOURCED THE ADMINISTRATION OF THEIR CLINICAL PROGRAM
14 TO THIS LEGAL AID OFFICE. AND SO MY JOB WAS TO
15 SUPERVISE LAW STUDENTS IN DOMESTIC VIOLENCE CASES AND
16 CHILD SUPPORT CASES IN STATE COURT IN DELAWARE COUNTY IN
17 MEDIA.

18 Q. AND THEN YOU MENTIONED WORKING AT SAINT
19 GABRIEL'S?

20 A. CORRECT.

21 Q. WHAT IS IT THAT YOU DID AFTER YOUR TIME AT SAINT
22 GABRIEL'S CAREER-WISE?

23 A. SO I DID -- IN 1989 I LEFT SAINT GABE'S AND WENT
24 BACK TO DELAWARE COUNTY -- DELAWARE COUNTY LEGAL
25 ASSISTANCE IN ESSENTIALLY THE SAME ROLE AS A CLINICAL

1 INSTRUCTOR FOR A YEAR. AND THEN WAS HIRED AS GENERAL
2 COUNSEL OF THE SUPPORT CENTER FOR CHILD ADVOCATES IN
3 APRIL OF 1990.

4 Q. AND ARE YOU STILL THERE TODAY?

5 A. I AM. IN NOVEMBER OF 1992 I WAS ELECTED -- I
6 WAS ELECTED. I WAS SELECTED BY THE BOARD OF DIRECTORS
7 TO BE THE EXECUTIVE DIRECTOR OF CHILD ADVOCATES. AND I
8 HAVE CONTINUED IN THE ROLE OF EXECUTIVE DIRECTOR SINCE
9 NOVEMBER OF '92.

10 Q. AND THIS MIGHT SEEM LIKE AN OBVIOUS QUESTION,
11 BUT CAN YOU TELL HER HONOR WHAT IT IS -- WHAT DOES IT
12 MEAN TO BE A CHILD ADVOCATE?

13 A. SO CHILD ADVOCATE IS A TERM OF ART USED ALMOST
14 EXCLUSIVELY IN OUR WORK IN PHILADELPHIA COUNTY. MOST
15 JURISDICTIONS USE THE PHRASE GUARDIAN AD LITEM, AND IT
16 IS ESSENTIALLY TO SERVE AS A LAWYER FOR A CHILD,
17 COURT-APPOINTED LAWYER FOR A CHILD IN A CHILD PROTECTION
18 PROCEEDING, WHICH IN PENNSYLVANIA IS KNOWN AS A
19 DEPENDENCY COURT CASE IN THE JUVENILE COURTS. OUR
20 OFFICE REPRESENTS CHILDREN IN CHILD WELFARE PROCEEDINGS
21 AND RELATED PROCEEDINGS IN PHILADELPHIA'S COURT OF
22 COMMON PLEAS.

23 Q. AND BEFORE WE GO INTO THE SPECIFICS AS TO WHAT
24 YOU WOULD DO AS A CHILD ADVOCATE, CAN YOU TELL HER HONOR
25 SORT OF WHO ARE THE PLAYERS IN THE DEPENDENCY COURT

1 SYSTEM IN PHILADELPHIA?

2 A. A CLASSIC, WE THINK OF A TRIAD OF CHILD, PARENT
3 AND STATE AS THE THREE PARTIES TO A PROCEEDING. AND SO
4 THE CHILD OR SIBLING GROUP IS A PARTY OF INTEREST IN
5 THAT PROCEEDING. THOSE PROCEEDINGS ARE TYPICALLY
6 INITIATED BY A COUNTY CHILDREN AND YOUTH AGENCY. HERE
7 IN PHILADELPHIA IT'S THE DEPARTMENT OF HUMAN SERVICES
8 AND THE DEPARTMENT OF HUMAN SERVICES IS REPRESENTED BY
9 LAWYERS FROM THE CITY LAW DEPARTMENT. AND THEN THERE
10 ARE ONE OR TWO PARENTS IN THE PROCEEDING. THEY
11 TYPICALLY HAVE SEPARATE COUNSEL, AND THUS WE HAVE CHILD,
12 PARENT, STATE AS THE THREE KIND OF MAIN ACTORS OR
13 PARTIES. THERE ARE A VARIETY OF PROVIDER AGENCIES WHO
14 COME BEFORE THE COURT TYPICALLY NOT AS PARTY, BUT IN
15 EITHER A WITNESS ROLE OR OTHERWISE COME TO THE ATTENTION
16 OF THE COURT.

17 Q. AND WHEN YOU MENTIONED PARENTS, CAN YOU BREAK
18 THAT DOWN, DO YOU MEAN BIOLOGICAL PARENTS, FOSTER
19 PARENTS, CAN YOU JUST PLEASE CLARIFY FOR HER HONOR WHAT
20 YOU MEANT BY PARENTS?

21 A. SO THE NATURE OF A DEPENDENCY PROCEEDING IS TO
22 INTERVENE WITH REGARD TO THE PARENT/CHILD RELATIONSHIP,
23 THE LEGAL RELATIONSHIP. SO MOSTLY WE ARE TALKING ABOUT
24 BIRTH PARENTS, MOTHERS AND FATHERS. ON OCCASION THERE
25 IS SOME OTHER ADULT CAREGIVER WHO HAS A LEGAL

1 RELATIONSHIP WITH THE CHILD AND THUS THEY GET STANDING
2 IN THAT DEPENDENCY PROCEEDING, SO THAT COULD BE A
3 GRANDPARENT, IT COULD BE A STRANGER WHO HAS BEEN
4 PROVIDING CARE FOR THE CHILD OR MAYBE WHO HAS BEEN
5 RECOGNIZED BY SOME OTHER COURT AS HAVING CUSTODY. THOSE
6 ARE ALL THE FOLKS THAT HAVE A LEGAL RELATIONSHIP WITH
7 THE CHILD. WELL, OF COURSE, WE ALSO INTERACT WITH
8 CAREGIVERS WHO ARE INTERPOSED BY SOME PROVIDER AGENCY
9 SUCH AS WE HAVE BEEN DISCUSSING HERE FROM A FOSTER CARE
10 AGENCY OR THE LIKE. AND THOSE FOLKS MIGHT BE STRANGERS
11 TO THE CHILD BEFORE THEY COME TO KNOW THE CHILD OR THEY
12 MIGHT BE A RELATIVE OF THE CHILD, WHAT WE CALL KINSHIP
13 RELATIONSHIP.

14 Q. AND JUST FOR CLARITY, HOW LONG HAVE YOU BEEN A
15 CHILD ADVOCATE?

16 A. ONE MIGHT SAY SINCE I HAVE BEEN WORKING AT THE
17 SUPPORT CENTER FOR CHILD ADVOCATES SINCE 1990, IN THIS
18 FORMAL SENSE OF GUARDIAN AD LITEM IN COURT CASES. I
19 FEEL LIKE MY OTHER ANSWER TO THAT QUESTION OFTEN IS MY
20 WHOLE LIFE. THIS IS WHAT I FEEL LIKE I -- I AM ABOUT.
21 IT IS BECOME MY PERSONAL MISSION, MY SENSE OF
22 SELF-IDENTITY IS TO BE AN ADVOCATE FOR CHILDREN.

23 Q. AND IN YOUR PREPARING TO GO TO COURT AND IN YOUR
24 ROLE AS A CHILD ADVOCATE, CAN YOU EXPLAIN TO HER HONOR
25 WHAT IS IT THAT YOU HAVE TO DO TO PREPARE AND MAKE SURE

1 THAT YOU FULFILL THOSE DUTIES?

2 A. SO THE MODEL THAT I USE IN MY OWN CASES IS THE
3 MODEL OF OUR OFFICE, WHAT WE THINK OF AS A SERVICE
4 MODEL. AND WE THINK OF OUR TASK AS TO REPRESENT THE
5 WHOLE CHILD. A CHILD IS REFERRED TO ME AND MY -- I
6 DON'T HAVE AN INDIVIDUAL LAW PRACTICE OUTSIDE OF THE
7 OFFICE. SO WHEN I USE "WE," I'M TALKING ABOUT BOTH MY
8 OWN PRACTICE AND THAT OF MY COLLEAGUES WHO ARE IN OUR
9 OFFICE. SO OUR PRACTICE INVOLVES RESPONDING TO THE
10 PRESENTING PROBLEM THAT BROUGHT A CHILD TO THE ATTENTION
11 OF OUR OFFICE AND TO THE ATTENTION OF THE COURTS. THAT
12 PRESENTING PROBLEM MIGHT, FOR EXAMPLE, BE AN INCIDENT OF
13 CHILD SEXUAL ABUSE OR PHYSICAL ABUSE OR SEVERE NEGLECT,
14 WHICH INCIDENT WAS THEN BROUGHT TO THE COURT, FOR
15 EXAMPLE, BY THE DEPARTMENT OF HUMAN SERVICES IN A
16 PETITION. THAT CASE IS ESSENTIALLY PETITIONED TO COURT
17 AND WE ARE APPOINTED BY THE COURT TO SERVE AS COUNSEL
18 AND GUARDIAN AD LITEM FOR THE CHILD.

19 WE WORK HARD TO UNDERSTAND THE EVENTS,
20 BACKGROUND RELATED TO THE PRESENTING PROBLEM. AND THEN
21 AS WELL TO UNDERSTAND THE -- ALL OF THE COLLATERAL
22 ISSUES THAT MIGHT BE INVOLVED IN A CHILD'S LIFE. ONE
23 MIGHT THINK, FOR EXAMPLE, IN A CHILD SEX ABUSE CASE THAT
24 THAT CHILD NEEDS THERAPY AND NEEDS ACCESS TO THERAPY,
25 NEEDS TRANSPORTATION TO THE THERAPIST, NEEDS A REPORT

1 FROM THE THERAPIST. WE NEED TO KNOW WHETHER SHE IS
2 MAKING PROGRESS. SHE NEEDS TO BE IN SCHOOL. SHE NEEDS
3 TO BE IN THE RIGHT SCHOOL. AND SO WE ARE GOING TO
4 ENGAGE HER SCHOOL COMMUNITY, COUNSELORS MOSTLY.

5 IN THE MAIN WE ARE GOING TO INTERACT WITH
6 THE CASE MANAGERS ON THE CASE. HERE IN PHILADELPHIA
7 THEY WORK FOR CUA'S, COMMUNITY UMBRELLA AGENCIES, WE
8 INTERACT WITH THE CUA WORKER ON THE CASE. WE MIGHT WORK
9 WITH SOME OF THE PARTS OF PHILADELPHIA DHS THAT WE HAVE
10 HEARD ABOUT OVER THE PAST FEW DAYS, LIKE THE CENTRAL
11 REFERRAL UNIT, CONTRACT ADMINISTRATION, THE
12 COMMISSIONER'S OFFICE OR OTHERWISE TO DEAL WITH PROBLEMS
13 THAT EMERGE WITH REGARD TO THAT CHILD.

14 Q. CAN YOU TELL HER HONOR HOW -- THIS MIGHT BE
15 DIFFICULT, BUT CAN YOU ESTIMATE FOR HER HONOR ABOUT HOW
16 MANY CHILDREN YOU HAVE SERVED AS A CHILD ADVOCATE FOR IN
17 YOUR -- AS YOUR TIME -- DURING YOUR TENURE?

18 A. SO I DON'T HAVE AN INDIVIDUAL PRACTICE -- I'M
19 SORRY, CASELOAD THESE DAYS. FOR MANY YEARS OF MY
20 SERVICE AS DIRECTOR I ACTUALLY HAD A SUBSET OF KIDS WHO
21 WERE ASSIGNED TO ME IN THE MAIN. NOW I SERVE AS ONE OF
22 THE ROTATING STAFF ATTORNEYS THAT COVER CASES. ANY TIME
23 YOU ARE IN COURT ON BEHALF OF A CHILD, YOU ARE
24 REPRESENTING THAT CHILD. OUR OFFICE IS APPOINTED TO
25 REPRESENT THE CHILD, NOT INDIVIDUAL ATTORNEYS. SO I AM

1 NOT PERSONALLY APPOINTED TO REPRESENT VERY MANY KIDS.

2 YOU KNOW, IT HAPPENS, IN DISCRETE MOMENTS.

3 THE AGENCY REPRESENTS THESE DAYS ABOUT
4 1,100 KIDS A YEAR. SO IN ONE SENSE I FEEL RESPONSIBLE
5 AND AS REPRESENTATIVE I REPRESENT ALL 1,100 OF THOSE
6 KIDS. I CERTAINLY DON'T KNOW THEM ALL. I WAS IN COURT
7 YESTERDAY AND HAD THREE KIDS WHO I REPRESENTED, TWO WHO
8 WERE ADOPTED AND ONE WHO IS IN FOSTER CARE. ON FRIDAY I
9 HAD SEVEN KIDS WHO I REPRESENTED IN FOUR PROCEEDINGS.
10 SO I WOULD SAY THAT I HAVE PERSONALLY ENGAGED PROBABLY
11 SEVERAL THOUSAND CHILDREN, EITHER INDIVIDUAL
12 REPRESENTATION OVER MY CAREER, AND CERTAINLY HALF OF THE
13 AGENCY I BELIEVE OUR NUMBER IS SOMEWHERE IN THE ORDER OF
14 8,000 KIDS DURING MY TIME. VERY ROUGH ESTIMATE.

15 Q. AND I GUESS IN BOTH YOUR PERSONAL AND AS
16 REPRESENTATIVE OF YOUR -- OF THIS SUPPORT CENTER FOR
17 CHILD ADVOCATES, CAN YOU TELL HER HONOR ABOUT HOW MANY
18 OF THESE CHILDREN HAVE SELF-IDENTIFIED AS LGBTQ YOUTH?

19 A. FOR THE LAST ABOUT TEN YEARS WE HAVE MAINTAINED
20 A SPECIALTY PRACTICE IN WHICH WE ASSIGN DESIGNATED STAFF
21 TO WORK WITH YOUTH WHO HAVE SELF-IDENTIFIED. AND SO
22 ALONG THE WAY WE HAVE HAD OCCASION TO KEEP COUNT AT
23 LEAST OF THOSE WHO HAVE IDENTIFIED -- SELF-IDENTIFIED.
24 AND THAT NUMBER WE THINK IS SOMEWHERE BETWEEN 25 AND 50
25 CHILDREN A YEAR WHO HAVE EXPLICITLY SELF-IDENTIFIED.

1 CERTAINLY THERE ARE SOME NUMBER OF ADDITIONAL YOUTH --
2 PARDON ME -- WHO HAVE NOT YET COME OUT TO THEMSELVES OR
3 TO US OR TO OTHERS. AND, YOU KNOW, ONE MIGHT IMAGINE
4 THERE MAY BE ANOTHER SEVERAL DOZEN CHILDREN ON OUR
5 CASELOAD AT ANY ONE MOMENT WHO ARE QUESTIONING THEIR
6 IDENTITY.

7 MR. RIENZI: OBJECTION, MOVE TO STRIKE AS
8 SPECULATION.

9 THE COURT: OVERRULED.

10 BY MS. CORTES:

11 Q. AND MR. CERVONE, YOU SAID YOU DESIGNATE STAFF
12 SPECIFICALLY FOR THESE YOUTHS. WHY IS THAT?

13 A. OUR SERVICE MODEL INCLUDES ASSIGNMENT OF EACH
14 CHILD TO A STAFF MEMBER AS RESPONSIBLE FOR THAT CASE.
15 AND OUR SERVICE MODEL WE HAVE NOT MENTIONED INCLUDES
16 WORKING WITH VOLUNTEER LAWYERS FROM THE LEGAL COMMUNITY.
17 WE THINK OF OURSELVES AS THE VOLUNTEER LEGAL SERVICE FOR
18 ABUSED AND NEGLECTED CHILDREN. SO THAT WHEN A LAWYER
19 FROM THE COMMUNITY WANTS TO DO THEIR PRO BONO WORK FOR
20 ABUSED KIDS, THEY COME TO US. SO IN PART IN ORDER TO
21 FACILITATE THAT VOLUNTEER MODEL, EACH CHILD IS ASSIGNED
22 TO A CHILD ADVOCATE SOCIAL WORKER, PROBABLY 90 PERCENT
23 OR MORE OF OUR KIDS ARE ASSIGNED TO A CHILD ADVOCATE
24 SOCIAL WORKER. EIGHT TO TEN PERCENT ARE ASSIGNED TO A
25 STAFF ATTORNEY FOR PRIMARY RESPONSIBILITY. AND, YOU

1 KNOW, THE PURPOSE OF THOSE SEVERAL ASSIGNMENTS IS SO
2 THAT THERE IS A DISCRETE CASE MANAGER WHO KNOWS ABOUT
3 THE CASE AND WHO HAS -- IS ESSENTIALLY THE COLLECTOR OF
4 KNOWLEDGE AND DOCUMENTS AND THE PROTAGONIST FOR PURPOSES
5 OF ADVOCACY.

6 Q. NOW, I JUST WANT TO GO BACK TO YOUR GENERAL
7 EXPERIENCE IN CHILD ADVOCACY. HAVE YOU WRITTEN OR
8 PUBLISHED ANY ARTICLES REGARDING CHILD ADVOCACY?

9 A. I'VE PUBLISHED PROBABLY DOZEN OF PIECES, LAW
10 REVIEW ARTICLES, OP-EDS, NEWSLETTER PIECES, ARTICLES IN
11 PROFESSIONAL PUBLICATIONS, THE ABA LITIGATION MAGAZINE
12 -- I'M SORRY, WHATEVER THEIR PROFESSIONAL JOURNAL IS,
13 THE SECTION ON LITIGATION OF THE ABA. SO I DO A LOT OF
14 WRITING, PROBABLY PUBLISH THREE OR FOUR OR FIVE PIECES A
15 YEAR FOR, IN A SENSE, GENERAL CIRCULATION.

16 Q. AND BESIDES YOUR REGULAR SUPPORT TESTIMONY, HAVE
17 YOU BEEN ASKED TO TESTIFY REGARDING MATTERS OF CHILD
18 ADVOCACY?

19 MR. RIENZI: OBJECTION, JUST GET CLARITY
20 IF YOU ARE TALKING ABOUT THIS CASE OR --

21 MS. CORTES: I WILL REPHRASE, YOUR HONOR.

22 THE COURT: YES.

23 BY MS. CORTES:

24 Q. MR. CERVONE, HAVE YOU BEEN ASKED TO TESTIFY
25 REGARDING CHILD ADVOCACY BESIDES IN THIS PARTICULAR

1 CASE?

2 A. YES. SO TUESDAY MORNING I TESTIFIED BEFORE THE
3 GENERAL ASSEMBLY -- PENNSYLVANIA GENERAL ASSEMBLY HOUSE,
4 CHILD AND YOUTH COMMITTEE IN SUPPORT OF THE CREATION OF
5 THE OFFICE OF THE CHILDREN'S ADVOCATE, ESSENTIALLY AN
6 OMBUDSMAN FUNCTION. THAT'S THE THIRD TIME I HAVE
7 TESTIFIED ON THAT SUBJECT IN THE LAST 15 YEARS. IN JULY
8 OF LAST YEAR, JULY OF '17, I TESTIFIED BEFORE THE
9 INTERBRANCH COMMISSION. I PREVIOUSLY THOUGHT IT WAS THE
10 INTERRELATIONS COMMISSION BUT IT WAS THE PENNSYLVANIA
11 INTERBRANCH COMMISSION ON GENDER AND RACIAL BIAS ON THE
12 SUBJECT OF THE EXPERIENCE OF LGBT YOUTH IN THE CHILD
13 WELFARE SYSTEM.

14 Q. AND LET ME JUST STOP YOU RIGHT THERE. CAN YOU
15 TELL HER HONOR WHAT YOU TESTIFIED TO? CAN YOU TELL US
16 MORE ABOUT THE SUBJECT OF THAT TESTIMONY?

17 A. THE SUBJECT OF THAT TESTIMONY?

18 Q. YES.

19 A. OF THAT EVENT?

20 Q. YES.

21 A. YEAH. SO OUR OFFICE WAS INVITED TO SPEAK TO THE
22 INTERBRANCH COMMISSION ON THIS QUESTION OF THE
23 EXPERIENCE OF GAY AND LESBIAN YOUTH IN THE CHILD WELFARE
24 SYSTEM AND HOW THE SYSTEMS MIGHT SERVE THOSE CHILDREN
25 BETTER, AND SO --

1 Q. I'M SORRY TO INTERRUPT. WHEN YOU SAY THE
2 SYSTEMS, CAN YOU PLEASE EXPLAIN TO HER HONOR WHAT
3 EXACTLY IS MEANT BY THAT?

4 A. YES. SO THE INTERBRANCH COMMISSION, AS I
5 UNDERSTAND IT, IS A KIND OF JOINTLY-CREATED, ESSENTIALLY
6 RESEARCH ARM TO MAKE RECOMMENDATIONS TO THE SEVERAL
7 BRANCHES OF STATE GOVERNMENT. AND SO IT IS SOMEHOW
8 COMMISSIONED BY BOTH RESOLUTION OF THE GENERAL ASSEMBLY,
9 THE LEGISLATURE, AND APPOINTMENT FROM THE PENNSYLVANIA
10 SUPREME COURT. TO BE HONEST, I DON'T KNOW IF THE
11 EXECUTIVE BRANCH HAS ANY APPOINTMENTS IN THE
12 INTERBRANCH, YOU KNOW, STRUCTURE.

13 Q. AND CAN YOU TELL BEFORE -- I'M SORRY, BEFORE I
14 INTERRUPTED YOU TO EXPLAIN WHAT THE SYSTEMS WERE, COULD
15 YOU TELL HER HONOR WHAT IS IT -- MORE SPECIFICALLY WHAT
16 IT IS YOU TESTIFIED REGARDING THAT --

17 MR. RIENZI: OBJECTION, HEARSAY.

18 THE COURT: OVERRULED.

19 THE WITNESS: THE MEMBERS INVITED US TO
20 SPEAK ABOUT IT AND WHAT WE SPOKE ABOUT. I WENT WITH A
21 COLLEAGUE, A SPECIALIST, A WOMAN WHO -- A MASTER SOCIAL
22 WORKER WHO HAD RESPONSIBILITY FOR THIS PARTICULAR
23 CASELOAD FOR THE LAST FIVE YEARS. AND WE SHARED -- IN
24 PART WE SHARED THE STORIES AND EXPERIENCE OF ESSENTIALLY
25 DISCRIMINATION, ABUSE, OPPRESSION AND BULLYING THAT MANY

1 OF OUR CLIENTS HAVE EXPERIENCED DURING THEIR TIME EITHER
2 IN FOSTER CARE OR IN RESIDENTIAL PROGRAMS OR WITH THEIR
3 BIRTH FAMILIES. SO WE TALK ABOUT, IN A SENSE, THE
4 EXPERIENCE OF THEIR PROBLEMS. AS WELL WE TALK ABOUT IN
5 A SENSE, SOLUTIONS.

6 SO WE SPEND SOME TIME ACTUALLY TEACHING
7 ABOUT, IN A SENSE, LANGUAGE THAT MIGHT BE MORE
8 APPROPRIATELY USED TO ADDRESS ISSUES OF TRANSGENDER
9 IDENTITY. YOU KNOW, THE KIND OF RESPECT THAT HAS COME
10 TO EMERGE IN THE PUBLIC ARENA THESE DAYS AROUND SELECTED
11 OR PREFERRED PRONOUNS, PERSONS OF TRANSGENDER OR
12 BI-RACIAL IDENTITY -- I'M SORRY, BI-SEXUAL IDENTITY,
13 OCCASIONALLY HAVE A DESIRE TO NOT BE KNOWN IN THOSE
14 BINARY "HE" "SHE" TERMS. SO WE EXPLORED SOME OF THAT.
15 THIS IS A NEW AREA FOR MOST PEOPLE AND IT WAS A NEW TURF
16 FOR THIS BODY AND THEY INVITED US TO SHARE WHAT WE KNOW
17 FROM THE EXPERIENCE OF KIDS AND WHAT WE HAVE SEEN THERE.

18 Q. AND WHAT WERE SOME OF THE EXAMPLES OF THE
19 DISCRIMINATION THAT YOU TESTIFIED TO REGARDING THE
20 CHILDREN?

21 MR. RIENZI: OBJECTION, HEARSAY.

22 THE COURT: OVERRULED.

23 THE WITNESS: SO ONE SCENARIO THAT I
24 RECALL IN A WAY IS TYPICAL OF THE EXPERIENCE OF KIDS IS
25 A YOUNG MAN, AND I THINK HE IDENTIFIES HIMSELF AS MALE,

1 WHO WAS IN CARE BECAUSE HE HAD BEEN HARASSED BY HIS OWN
2 BIRTH FAMILY ABOUT HIS EMERGING SEXUAL IDENTITY. I
3 DON'T RECALL IF THERE WAS PHYSICAL ABUSE IN THAT CASE.
4 BUT IT WOULD NOT BE UNCOMMON FOR GAY KIDS TO BE BOTH
5 PHYSICALLY AND EMOTIONALLY ABUSED IN THEIR FAMILY OF
6 ORIGIN. IT'S ONE OF THE REASONS IN GENERAL THAT GAY
7 KIDS COME INTO CHILD WELFARE FOR PROTECTION, BECAUSE
8 THEY ARE NOT WELCOME AT HOME.

9 MR. RIENZI: OBJECTION, YOUR HONOR.
10 COUNSEL HAS YET PROFFERED THE WITNESS AS AN EXPERT. I
11 DON'T KNOW IF WE ARE THERE YET, BUT IT SURE SEEMS LIKE
12 THE WITNESS IS VENTURING INTO GENERALITIES AS OPPOSED TO
13 ANY FACT TESTIMONY.

14 THE COURT: DO YOU HAVE QUESTIONS IN
15 REGARD TO HIS QUALIFICATIONS?

16 MR. RIENZI: ABSOLUTELY, YOUR HONOR.

17 THE COURT: DO YOU HAVE ANY OTHER
18 QUESTIONS IN REGARD TO HIS QUALIFICATIONS?

19 MS. CORTES: IN REGARDS TO HIS
20 QUALIFICATIONS, NO, YOUR HONOR.

21 MR. RIENZI: MAY I ASK, YOUR HONOR, WHAT
22 THE TOPIC IS HE IS BEING PROFFERED AS AN EXPERT ON?

23 MS. CORTES: YOUR HONOR, I THINK AS MR.
24 CERVONE HAS TESTIFIED THUS FAR, HE IS BEING PROFFERED AS
25 AN EXPERT REGARDING CHILD ADVOCACY -- WELL, MORE

1 SPECIFICALLY THE PROBLEMS FACED BY CHILDREN WITHIN THE
2 FOSTER CARE SYSTEM, AND IN PARTICULAR THE LGBTQ YOUTH,
3 AND ALSO AS TO HIS CONCLUSIONS AND OBSERVATIONS AS TO
4 THE IMPORTANCE OF A SAFE FOSTER CARE SYSTEM FOR THAT
5 LGBTQ YOUTH.

6 THE COURT: OKAY. YOU CAN ASK QUESTIONS,
7 COUNSEL.

8 MR. RIENZI: THANK YOU, YOUR HONOR.

9 CROSS-EXAMINATION - QUALIFICATIONS

10 BY MR. RIENZI:

11 Q. MR. CERVONE, YOU'RE AN ATTORNEY?

12 A. YES.

13 Q. YOU'RE AN ATTORNEY IN THIS CASE?

14 A. NOT ANY LONGER.

15 Q. THAT'S NOT TRUE, IS IT? YOU HAVE NOT WITHDRAWN
16 FROM THE CASE, HAVE YOU?

17 A. WELL, IN POINT OF FACT I HAVE NOT ENTERED MY
18 APPEARANCE IN THE CASE IN LARGE PART BECAUSE I HAVE NOT
19 FIGURED OUT HOW TO DO SO IN THE FEDERAL FILING SYSTEM.
20 I AM ON THE PAPERS AND WE ANTICIPATE MY COUNSEL
21 WITHDRAWING ME FROM THOSE PAPERS.

22 Q. BUT YOU HAVE NOT WITHDRAWN YET, CORRECT?

23 A. LIKE I SAID, I HAVE NOT ENTERED MYSELF, BUT WE
24 HAVE NOT EFFECTIVELY WITHDRAWN.

25 Q. YOU HAVE PARTICIPATED AS AN ADVOCATE IN THESE

1 PROCEEDINGS, HAVE YOU NOT?

2 MS. CORTES: OBJECTION.

3 THE COURT: OVERRULED.

4 BY MR. RIENZI:

5 Q. YOU HAVE PARTICIPATED AS AN ADVOCATE IN THESE
6 PROCEEDINGS, HAVE YOU NOT?

7 A. I AM NOT SURE I HAVE.

8 Q. YOUR NAME IS ON A BRIEF, SIR, IS IT NOT?

9 A. YES.

10 Q. THAT'S -- YOU ARE A LAWYER, YOU UNDERSTAND THAT
11 TO BE PARTICIPATING AS AN ADVOCATE, CORRECT?

12 A. IN THAT SENSE, SURE.

13 Q. AND THAT BRIEF HAS BEEN ACCEPTED BY THE COURT AS
14 AN AMICUS BRIEF, CORRECT?

15 A. YES.

16 Q. AND THERE'S A PENDING MOTION WITH YOUR NAME ON
17 IT FOR PARTICIPATION VIA INTERVENTION, IS THAT CORRECT?

18 A. YES.

19 Q. AND THE MOTION IS ON BEHALF OF CHILD ADVOCATES,
20 WHICH IS THE ORGANIZATION YOU ARE THE EXECUTIVE DIRECTOR
21 OF, CORRECT?

22 A. CORRECT.

23 Q. HAVE YOU EVER PARTICIPATED AS A TESTIFYING
24 WITNESS IN ANOTHER CASE IN WHICH YOU HAVE BEEN AN
25 ADVOCATE?

1 A. YES, ACTUALLY LAST MONTH.

2 Q. WHERE WAS THAT?

3 A. THAT WAS IN THE COURT OF COMMON PLEAS IN
4 PHILADELPHIA COUNTY.

5 Q. DID YOU PARTICIPATE AS AN EXPERT WITNESS?

6 A. NO.

7 Q. I HEARD THE DESCRIPTION FROM -- COUNSEL FOR THE
8 CITY IS NOT YOUR LAWYER, CORRECT?

9 A. CORRECT.

10 Q. I HEARD THE DESCRIPTION FROM COUNSEL FOR THE
11 CITY ABOUT THE TOPIC ON WHICH YOU ARE AN EXPERT AND I
12 WANT TO MAKE SURE I UNDERSTAND IT. SO YOU ARE BEING
13 PROFFERED AS AN EXPERT ON CHILDREN AND THE IMPACT ON
14 LGBTQ YOUTH IN THE FOSTER CARE SYSTEM, IS THAT CORRECT?

15 A. WELL, IT'S THEIR PROFFER. YOU KNOW, I KNOW WHAT
16 I KNOW. I AM NOT SURE. TO BE HONEST, I DON'T THINK I
17 CAN COMMENT ON HOW THEY ARE PROFFERING ME.

18 Q. YOUR EXPERTISE IS WORKING WITH CHILDREN,
19 CORRECT?

20 A. REPRESENTING CHILDREN, WORKING WITH CHILDREN,
21 YES.

22 Q. YOUR EXPERTISE IS NOT REPRESENTING AND WORKING
23 WITH PARENTS, CORRECT?

24 A. I CERTAINLY HAVE A LOT OF EXPERIENCE IN
25 REPRESENTING PARENTS. I HAVE REPRESENTED PARENTS. LIKE

1 I SAID, I TAUGHT SOME PEOPLE HOW TO REPRESENT ADULTS. I
2 HAVE ON MORE THAN A FEW OCCASIONS REPRESENTED BOTH
3 PARENTS AND ADULTS IN A VARIETY OF COURT PROCEEDINGS IN
4 MY CAREER, YOU KNOW, MOSTLY AS COMES ABOUT AS -- ON
5 BEHALF OF FORMER CLIENTS, FORMER CLIENT CHILDREN OF OURS
6 WHO HAVE GROWN UP AND THEY HAVE SOMETHING ELSE IN THEIR
7 LIFE.

8 Q. SURE. WE HAD A MEETING IN A ROOM RIGHT OUTSIDE
9 BEFORE THIS, SIR?

10 A. YES.

11 Q. AND YOU RECALL IN THAT MEETING YOU TOLD ME THAT
12 YOUR EXPERTISE IS IN DEALING WITH THE CHILDREN'S SIDE OF
13 IT, NOT THE PARENT SIDE OF IT. DO YOU RECALL TELLING ME
14 THAT?

15 A. SO I DON'T THINK I WOULD HAVE PUT IT THAT WAY.
16 FORGIVE ME, I DON'T AGAIN MEAN TO AVOID YOU. WE ARE
17 CHILDREN'S LAWYERS, I AM A CHILDREN'S LAWYER. AS AN
18 OFFICE, WE ONLY REPRESENT KIDS. BECAUSE I HAVE A LAW
19 LICENSE AND BECAUSE I AM THE BOSS, I GET TO REPRESENT
20 WHO I WANT. AND SO I TRY TO RESPECT THE BOUNDARIES THAT
21 WE HAVE ALL AGREED TO AS AN OFFICE, BUT ON OCCASION I
22 ENTER MY APPEARANCE IN SOME WAY OR OTHER ON BEHALF OF
23 ADULTS.

24 Q. YOU DON'T CONSIDER YOURSELF AN EXPERT IN THE
25 INTEREST OF ADULTS, DO YOU?

1 MS. CORTES: OBJECTION TO THE RELEVANCE.

2 THE COURT: OVERRULED.

3 THE WITNESS: I DO THINK -- I THINK I
4 HAVE SOME EXPERTISE. I TEACH PEOPLE HOW TO REPRESENT
5 ADULTS, SURE.

6 BY MR. RIENZI:

7 Q. MORE THAN ANY OTHER LAWYER WHO REPRESENTS
8 ADULTS?

9 MS. CORTES: OBJECTION.

10 THE COURT: YES, SUSTAINED.

11 BY MR. RIENZI:

12 Q. OTHER THAN SOMETIMES REPRESENTING ADULTS, DO YOU
13 HAVE ANY OTHER CLAIM TO EXPERTISE IN THE INTEREST OF
14 ADULTS?

15 A. WELL, SO -- YES.

16 Q. AND WHAT IS THAT?

17 A. SO THE ADMINISTRATIVE OFFICE OF PENNSYLVANIA
18 COURTS INVITED ME TO CO-LEAD A TRAINING SERIES FOR
19 PARENT AND CHILDREN LAWYERS IN PENNSYLVANIA ACROSS THE
20 STATE, ALONG WITH A COLLEAGUE FROM COMMUNITY LEGAL
21 SERVICES IN PHILADELPHIA. WE ASSEMBLED A FACULTY OF
22 LAWYERS AND JUDGES AND I BELIEVE A SOCIAL WORKER. AND
23 WE CONDUCTED ESSENTIALLY A ROAD SHOW OF TWO FULL DAYS OF
24 CLE TRAINING IN SIX CITIES OVER, YOU KNOW, A SUMMERTIME
25 THREE SUMMERS AGO, I THINK, IN WHICH WE TRAINED PROBABLY

1 80 PERCENT OF THE LAWYERS WHO SERVE PARENTS AND CHILDREN
2 IN DEPENDENCY PROCEEDINGS.

3 WE REGULARLY TRAIN -- I AND MY COLLEAGUES
4 REGULARLY TRAIN THE COURT-APPOINTED BAR IN PHILADELPHIA
5 COUNTY WHO REPRESENT PARENTS AND CHILDREN. WE ARE THE
6 DESIGNATED CLE PROVIDER FOR THE FIRST JUDICIAL DISTRICT
7 IN ORDER TO QUALIFY THOSE LAWYERS TO REPRESENT PARENTS
8 IN DEPENDENCY PROCEEDINGS. I HAVE PUBLISHED EXTENSIVELY
9 ON THE -- REALLY THE NATURE AND SCOPE AND DEMANDS OF
10 REPRESENTATION FOR CHILDREN. AND LASTLY, I AM A
11 SCRIVENER OF THE STANDARDS OF PRACTICE FOR LAWYERS WHO
12 REPRESENT CHILDREN AND PARENTS IN DEPENDENCY PROCEEDINGS
13 WHICH STANDARDS HAVE BEEN APPROVED BY THE PENNSYLVANIA
14 STATE CHILDREN CHILD STUDY TEAM.

15 Q. YOU HAVE A LOT OF EXPERIENCE TRAINING LAWYERS TO
16 REPRESENT BOTH ADULTS AND CHILDREN, IS THAT FAIR?

17 A. YEAH. WE REALLY FEEL LIKE IT'S ALL OF A PIECE.

18 Q. DO YOU HAVE ANY EXPERIENCE IN CHILD PSYCHOLOGY?

19 MS. CORTES: OBJECTION, VAGUE.

20 BY MR. RIENZI:

21 Q. DO YOU HAVE ANY TRAINING IN CHILD PSYCHOLOGY?

22 THE COURT: OVERRULED.

23 THE WITNESS: SO DURING MY MASTER'S
24 TRAINING, I HAD SEVERAL COURSES RELATED TO FAMILY
25 DYNAMICS. WHILE THEY WERE NOT IN THE PSYCHOLOGY PROGRAM

1 AT LASALLE UNIVERSITY, THERE WERE, I BELIEVE, ALL OF
2 THOSE COURSES WERE OFFERED IN THE THEOLOGY PROGRAM, BUT
3 THERE WAS A COURSE IN FAMILY DYNAMICS, THERE WAS STUDY
4 OF GENEALOGY AND -- THEY CALL THAT TRANSGENERATIONAL
5 INFLUENCES. I WOULD NOT IN ANY WAY HOLD MYSELF OUT TO
6 BE A PSYCHOLOGIST, AND MY WIFE URGES ME NOT TO TRY TO
7 PRACTICE THERAPY.

8 Q. WHAT PRINCIPLES AND METHODS DO YOU EXPECT TO BE
9 APPLYING IN YOUR TESTIMONY TODAY?

10 MS. CORTES: OBJECTION, CALLS FOR A LEGAL
11 CONCLUSION, YOUR HONOR.

12 MR. RIENZI: THE DAUBERT STANDARD UNDER
13 RULE 702 REQUIRES THAT HE BE APPLYING RELIABLE
14 PRINCIPLES AND METHODS. I AM SIMPLY ASKING WHAT THEY
15 ARE.

16 THE COURT: OVERRULED.

17 THE WITNESS: SO AS I SAID, I HELP WRITE
18 THE STANDARDS AND PRACTICE FOR THE REPRESENTATION OF
19 CHILDREN. AND I IMAGINE I WOULD REFERENCE WHAT MANY OF
20 US CONSIDER TO BE BEST PRACTICE STANDARDS FOR THE CARE
21 OF CHILDREN, THE REPRESENTATION OF CHILDREN AND SERVICE
22 TO CHILDREN. CERTAINLY AS WELL, MY GENERAL KNOWLEDGE
23 AND TRAINING AS A LAWYER IN THIS FIELD FOR 30 YEARS.
24 YEAH.

25 Q. ANYTHING ELSE? ANY OTHER PRINCIPLES AND METHODS

1 YOU EXPECT TO BE APPLYING TODAY?

2 A. WELL, I AM FAIRLY KNOWLEDGEABLE ABOUT THE CANONS
3 OF ETHICS, THE RULES OF JUVENILE COURT PROCEDURE, THE
4 JUVENILE ACT AND RELATED BODIES OF LAW THAT PERTAIN TO
5 THIS AREA OF PRACTICE. CERTAIN BODIES OF LAW THAT
6 ADDRESS RESPONSIBILITIES RELATED TO DISCRIMINATION OR
7 NONDISCRIMINATION IN PRACTICE. AS WELL, I HAVE BEEN THE
8 ADMINISTRATOR OF A PROGRAM OF REPRESENTATION OF, YOU
9 KNOW, A NONPROFIT AGENCY. AND SO I HAVE SOME BACKGROUND
10 AND EXPERTISE IN NONPROFIT MANAGEMENT. IN, YOU KNOW --
11 YEAH.

12 Q. YOU SAID YOU WORKED AS AN ATTORNEY FOR SAINT
13 GABRIEL'S SYSTEM FOR FIVE YEARS, IS THAT CORRECT?

14 A. CORRECT.

15 Q. SAINT GABRIEL'S SYSTEM IS PART OF CATHOLIC
16 SOCIAL SERVICES, A PARTY TO THIS CASE, CORRECT?

17 A. CORRECT.

18 Q. AND IN FACT, SAINT GABRIEL'S SYSTEM IS ON THE
19 SAME CONTRACT THAT'S AT ISSUE ABOUT FOSTER CARE,
20 CORRECT?

21 MS. CORTES: YOUR HONOR, I DON'T SEE HOW
22 THIS IS RELEVANT TO THIS VOIR DIRE REGARDING MR.
23 CERVONE.

24 THE COURT: OVERRULED.

25 THE WITNESS: I AM NOT AWARE OF THE

1 CURRENT STATE OF THE CONTRACT.

2 BY MR. RIENZI:

3 Q. WHEN YOU WERE AT SAINT GABRIEL'S, DID YOU
4 UNDERSTAND THAT THERE WAS A CONTRACT WITH THE CITY THAT
5 COVERED BOTH SAINT GABRIEL'S AND FOSTER CARE?

6 A. WELL, MY RECOLLECTION WOULD HAVE BEEN THAT THEY
7 WERE SEPARATE CONTRACTS, BUT IT'S BEEN A LONG TIME.

8 Q. OKAY.

9 MR. RIENZI: YOUR HONOR, WE OBJECT TO THE
10 INTRODUCTION OF MR. CERVONE AS AN EXPERT. HIS
11 PARTICIPATION VIOLATES THE WITNESS ADVOCATE RULE.
12 WHETHER HE'D LIKE TO OR NOT, HE IS AN ADVOCATE IN THIS
13 CASE. HE HAS SIGNED PLEADINGS IN THIS CASE, HIS NAME
14 APPEARS ON BRIEFS IN THIS CASE. HE SUBMITTED A
15 DECLARATION THAT SAYS THAT THE ORGANIZATION HE LEADS,
16 CHILD ADVOCATES, HAS AN INTEREST IN THIS CASE. HE IS
17 ALSO A FORMER LAWYER FOR ONE OF THE ORGANIZATIONS THAT
18 IS ON THE CONTRACT. AND ON TOP OF THAT, I DID NOT HEAR
19 ANY DESCRIPTION OF RELIABLE PRINCIPLES AND METHODS. I
20 HEARD A DISCUSSION OF EXPERIENCE THAT HE HAS, BUT DID
21 NOT HEAR RELIABLE PRINCIPLES AND METHODS THAT UNDER RULE
22 702 AND DAUBERT ARE GOING TO BE APPLIED, SO WE WOULD
23 OBJECT, YOUR HONOR.

24 THE COURT: YOUR OBJECTION IS OVERRULED.

25 MR. RIENZI: I ASSUME, YOUR HONOR, I WILL

1 GET ANOTHER CHANCE TO COME UP AND CROSS-EXAMINE AFTER
2 THE DIRECT EXAMINATION IS COMPLETED.

3 THE COURT: CROSS-EXAMINE AS TO THE
4 SUBSTANCE OF HIS TESTIMONY.

5 MR. RIENZI: YES, THANK YOU.

6 DIRECT EXAMINATION

7 BY MS. CORTES:

8 Q. I THINK WHEN WE LAST SPOKE, MR. CERVONE, THAT
9 YOU WERE LETTING HER HONOR KNOW THE BASIS OF YOUR
10 TESTIMONY REGARDING DISCRIMINATION ON THE LGBTQ YOUTH.

11 A. YES.

12 Q. I WAS NOT SURE IF YOU HAD CONCLUDED YOUR
13 TESTIMONY ON THAT OR --

14 A. YOU MEAN PARTICULARLY REGARDING THE PRIOR
15 TESTIMONY?

16 Q. CORRECT.

17 A. WELL, IN POINT OF FACT, ONE OF THE REASONS --
18 YEAH, SO I BELIEVE, AND IT HAS BEEN MY EXPERIENCE, THAT
19 CHILDREN -- LGBT YOUTH COME INTO OUR CHILD WELFARE
20 SYSTEM IN PART BECAUSE HOW THEY ARE TREATED IN THEIR OWN
21 FAMILIES. AND SOMETIMES THEY CONTINUE TO HAVE THOSE BAD
22 EXPERIENCES WHEN THEY ARE IN THE CARE OF FAMILIES WHO
23 THE SYSTEM ENGAGES, RESOURCE PARENTS, CHILD CARE
24 WORKERS, AND OTHERS.

25 Q. SO BASED ON THAT -- BASED ON THAT OBSERVATION,

1 HOW IMPORTANT THEN IS IT TO HAVE A FOSTER CARE SYSTEM
2 THAT HAS AFFIRMING VALUES FOR LGBT YOUTH?

3 A. WELL, I THINK IT'S ABSOLUTELY ESSENTIAL THAT OUR
4 CLIENT CHILDREN FEEL WELCOME AND SUPPORTED IN THEIR
5 PERSON AND IN THEIR IDENTITY, THAT THEY COME TO A SYSTEM
6 FOR REFUGE FROM WHAT IS ESSENTIALLY OPPRESSION, FROM
7 ABUSE AND NEGLECT, OFTEN, AS I SAID, TYPICALLY TARGETED
8 ON THEIR IDENTITY AND IT IS ABSOLUTELY ESSENTIAL THAT
9 THEY FIND IN ALL OF US, IN THE CHILD WELFARE SYSTEM AND
10 ALL OF ITS PRACTITIONERS A PLACE OF JUSTICE, A PLACE OF
11 HEALING AND A PLACE OF SAFETY. AND IN NO UNCERTAIN
12 TERMS THAT MEANS THAT HOMES MUST BE WELCOMING TO THEM.
13 THEY MUST BE AFFIRMING TO THEM, THEY MUST BE PLACES AND
14 PEOPLE AND ORGANIZATIONS THAT SAY YES TO THEIR
15 EXPLORATION OF THEIR OWN IDENTITY. IN A SENSE, IT GOES
16 WITHOUT SAYING THAT THE YOUNG PERSON IS STILL EXPLORING
17 HIMSELF OR HERSELF IN THEIR IDENTITY. THAT'S WHAT WE
18 ARE ALL DOING AS YOUNG PEOPLE, AND IT'S ESSENTIAL THAT
19 THAT YOUNG PERSON HAVE A SAFE PLACE IN WHICH TO DO THAT.

20 Q. NOW, WERE YOU HERE YESTERDAY -- WELL, IT'S BEEN
21 MULTIPLE DAYS. I MEAN NOBODY WAS HERE YESTERDAY. BUT
22 WERE YOU HERE --

23 THE COURT: I WAS HERE.

24 BY MS. CORTES:

25 Q. WERE YOU HERE, MR. CERVONE, IN COURTROOM 16B A

1 FEW DAYS AGO WHEN MR. AMATO TESTIFIED?

2 A. YES.

3 Q. DID YOU HEAR HIS TESTIMONY REGARDING CSS'S
4 PRACTICES ON SAME-SEX COUPLES?

5 A. YES.

6 Q. DID YOU HAVE ANY REACTION TO THAT TESTIMONY?

7 MR. RIENZI: OBJECTION, VAGUE.

8 THE COURT: OVERRULED.

9 THE WITNESS: YEAH, I WAS PRETTY UPSET BY
10 IT.

11 BY MS. CORTES:

12 Q. WHY WERE YOU UPSET BY THAT?

13 A. WELL, YOU KNOW, I HEARD -- I BELIEVE IT WAS HIS
14 REFERENCE TO THEIR MISSION AS WELCOMING ALL AND VALUING
15 ALL. AND THEN HE PROCEEDED TO EXPLAIN HOW SOME PEOPLE
16 ARE NOT WELCOME AND SUPPORTED. IT WAS NEWS TO ME THAT
17 THERE IS A BIT OF A LITMUS TEST FOR QUALIFICATION AS A
18 FOSTER PARENT AND RESOURCE PARENT IN THE CSS SYSTEM.
19 AND THAT FELT TO ME ITSELF CONTRARY TO THE SPIRIT OF THE
20 CHILD WELFARE SYSTEM AS A WHOLE. IT WAS -- I REALLY
21 CRYSTALIZED IN SITTING IN THIS ROOM DURING THAT
22 TESTIMONY THIS NOTION THAT I REFERENCED EARLIER THAT
23 FROM THE PERSPECTIVE OF THE CHILD, THE SYSTEM NEEDS TO
24 BE A WELCOMING SYSTEM. AND I THOUGHT JIM -- I WILL CALL
25 HIM JIM, I HAVE KNOWN HIM FOR A REALLY LONG TIME AND I

1 LIKE HIM A LOT AS A PERSON. I WAS SURPRISED THAT THE
2 SYSTEM -- THAT THEIR SYSTEM IS SO EXPLICITLY UNWELCOMING
3 OF CERTAIN TYPES OF PEOPLE.

4 Q. DID YOU HAVE ANY REACTION OR DID YOU HAVE ANY
5 CONCERNS REGARDING WHAT MR. AMATO SAID AS TO ITS EFFECT
6 ON PROSPECTIVE FOSTER PARENTS THAT ARE LGBTQ OR IN A
7 SAME-SEX UNION?

8 A. YES, I THINK HE IS WRONG. I THINK HE, IF I AM
9 TO CHARACTERIZE IT, I THOUGHT HE STATED, AT LEAST
10 IMPLIED, THAT THEIR PRACTICE WOULD NOT WORK TO DISSUADE
11 PROSPECTIVE RESOURCE PARENTS FROM COMING FORWARD TO
12 SERVE, THAT THEY CLEARLY -- THEY ARE FAIRLY EXPLICIT
13 THAT THEY WOULD DISSUADE THEM FROM COMING TO THEIR
14 AGENCY. HE ALSO OBVIOUSLY WAS RATHER EXPLICIT THAT IF
15 ONE CAME FORWARD, THEY WOULD SEND THAT PERSON OR COUPLE
16 TO SOME OTHER AGENCY, NOT TRY TO TALK THEM OUT OF DOING
17 BUSINESS, TO BE -- FAIR ENOUGH. BUT IN POINT OF FACT, I
18 BELIEVE THAT THIS PRACTICE MAY HAVE THE EFFECT OF
19 DISSUADING PROSPECTIVE RESOURCE FAMILIES FROM SERVING
20 CHILDREN AT ALL. THAT IF PEOPLE BELIEVE THAT THIS IS A
21 SYSTEM THAT IS ALLOWED TO DISCRIMINATE, THEY WILL HAVE A
22 CRISES IN CONFIDENCE ABOUT WORKING IN THE SYSTEM.

23 I FEEL LIKE IT'S A LOT LIKE WHEN IT IS
24 REVEALED THAT THE SYSTEM IS NOT PERFORMING WELL. AND I
25 AM SOMEBODY WHO SOMETIMES HELPS TO MAKE THOSE HEADLINES

1 BY REVEALING OR HELPING TO REVEAL WHEN THE SYSTEM IS NOT
2 PERFORMING WELL. AND CERTAINLY I HAVE HEARD THAT FOLKS
3 HAVE HAD A CRISIS OF CONFIDENCE, SHOULD I COME TO WORK
4 HERE, SHOULD I COME TO BE INVOLVED WITH THIS SYSTEM THAT
5 SEEMS SO CHAOTIC. I FEEL LIKE WE HAVE GOTTEN BEYOND
6 THAT IN THE PRESENT ADMINISTRATION OF THE SYSTEM FOR THE
7 LAST BUNCH OF YEARS. BUT I THINK THAT'S THE TYPE OF
8 EFFECT AND MESSAGE THAT IT WILL HAVE TO PROSPECTIVE
9 FOSTER FAMILIES, SAME-SEX FAMILIES, WHO WILL SAY WHY
10 SHOULD I COME TO A SYSTEM THAT TOLERATES THAT FORM OF
11 DISCRIMINATION?

12 MS. CORTES: YOUR HONOR, I'M JUST GOING
13 TO HAVE A MOMENT. MAY I HAVE A MOMENT TO CONFER WITH
14 COUNSEL?

15 THE COURT: YES.

16 (BRIEF PAUSE IN THE PROCEEDING.)

17 BY MS. CORTES:

18 Q. MR. CERVONE, YOU TALKED ABOUT THE POTENTIAL
19 IMPACT ON THE LGBTQ YOUTH THAT ARE CURRENTLY IN THE
20 FOSTER SYSTEM. DO YOU HAVE AN OPINION OR DO YOU THINK
21 THIS WILL AFFECT ALL OF THE CHILDREN IN THE FOSTER CARE
22 SYSTEM? "THIS" MEANING CSS'S PRACTICE THAT WE HEARD
23 ABOUT TODAY -- OR NOT TODAY, THROUGHOUT THIS HEARING?

24 MR. RIENZI: OBJECTION.

25 THE COURT: DO YOU UNDERSTAND THE

1 QUESTION?

2 THE WITNESS: WELL, I THINK THERE ARE
3 LOTS OF POSSIBLE EFFECTS. I'M NOT SURE WHERE YOU WOULD
4 GO WITH IT BUT I THINK THERE ARE EFFECTS ACROSS THE
5 SPECTRUM, FROM MY PERSPECTIVE. SO I THINK I UNDERSTAND
6 THE QUESTION.

7 THE COURT: OKAY.

8 MR. RIENZI: OBJECTION.

9 THE COURT: OVERRULED.

10 THE WITNESS: SO I THINK THAT THE --
11 LET'S JUST START WITH THE LOSS OF HOMES THAT JIM AMATO
12 REFERENCED, AND I THINK IT WOULD BE SAD TO LOSE THOSE
13 HOMES, BUT THAT THE SYSTEM WILL SURVIVE, THAT THE NUMBER
14 OF HOMES THAT ARE AT ISSUE LONG-TERM IS -- YOU KNOW,
15 THANKFULLY IT'S NOT 1,000 HOMES AND IT'S BETTER THAN --
16 OR TEN HOMES THAT MIGHT BE LOST WERE CSS ELECTED TO GET
17 OUT OF THE BUSINESS, AS JIM SUGGESTED. I THINK THE
18 SYSTEM MIGHT GET MANY OF THOSE RESOURCE FAMILIES WILL
19 MIGRATE OVER TO OTHER AGENCIES, SOME WILL NOT. THAT IS
20 WHAT HAS HAPPENED IN EVERY OTHER, IN A SENSE, CLOSURE OF
21 AN AGENCY.

22 AGENCIES CLOSE FOR A VARIETY OF REASONS.
23 THEY GO OUT OF BUSINESS, THEY MOVE ON AND THE FOSTER
24 PARENTS ARE LEFT TO DECIDE DO THEY STILL WANT TO FOSTER.
25 AND WE HAVE SEEN FOSTER PARENTS WHO ARE WITH AGENCY A

1 MIGRATE OVER TO AGENCY B. SO I EXPECT THAT THE SYSTEM
2 WILL HANDLE THAT EFFECT. I THINK THE EFFECT ON CHILDREN
3 PRESENTLY IN CARE IS ONE THAT I AM AND OUR OFFICE IS
4 VERY CONCERNED ABOUT. WE HOPE THAT THESE AGENCIES AND
5 THIS COURT DO NOT CAUSE THOSE KIDS TO BE TURNED OUT ON
6 THE STREET ON JUNE 30 WHEN THE CURRENT CONTRACT EXPIRES.
7 THAT WOULD BE VERY UPSETTING.

8 I THOUGHT JIM WAS PRETTY CLEAR AND NOBLE
9 IN SAYING THAT THEY DON'T INTEND TO TURN ANY OF THOSE
10 KIDS OUT. AT SOME POINT THEY MAY FEEL THAT -- THEY MAY
11 FEEL DIFFERENTLY FROM A BUSINESS PERSPECTIVE, THAT THEY
12 CAN NO LONGER RUN THOSE HOMES OR THEIR AGENCY. SO WE
13 ALL WILL HAVE TO WORK HARD TO MITIGATE THOSE EFFECTS.
14 YOU KNOW, THE EFFECT OF THE CONTINUED PLACEMENT OF KIDS
15 IN HOMES IN AN AGENCY THAT IS ALLOWED TO, IN A SENSE,
16 PUT OUT THIS MESSAGE THAT SAME-SEX COUPLES ARE SOMEHOW
17 NOT TO BE VALUED OR INAPPROPRIATE, WHATEVER WORD YOU
18 WANT TO PUT AS TO THE, IN ESSENCE, THE VALUATION OF
19 THEM.

20 AS I REFERENCED EARLIER IN THE
21 QUALIFICATIONS SECTION, I THINK WILL GIVE KIDS PRECISELY
22 THE WRONG MESSAGE AND IT WOULD BE AN UPSETTING ONE. THE
23 KIDS WHO COME TO A SYSTEM FOR JUSTICE NOW NEED A SYSTEM
24 THAT FEELS UNJUST. IT FEELS DISCRIMINATORY AND THAT
25 WILL HAVE A BAD -- THAT WILL HAVE A TERRIBLE EFFECT ON

1 ALL THE KIDS IN THE SYSTEM WHO COME TO UNDERSTAND IT.
2 WE FIND KIDS ARE PRETTY SMART AND THOUGHTFUL AND THEY
3 ASK QUESTIONS LIKE THAT AND I EXPECT THAT THEY WILL HAVE
4 THEIR OWN CRISIS IN CONFIDENCE ABOUT THIS SYSTEM IN
5 CARE.

6 MS. CORTES: THANK YOU.

7 CROSS-EXAMINATION

8 BY MR. RIENZI:

9 Q. MR. CERVONE, YOU SAID THAT CATHOLIC HAVING TO
10 STOP FOSTER CARE ON JUNE 30TH WOULD BE A BAD THING, IS
11 THAT CORRECT?

12 A. IT WOULD.

13 Q. AND YOU SAID THE NUMBER, IT'S GOOD THAT IT'S NOT
14 1,000, BUT IT'S NOT ZERO EITHER, IS IT?

15 A. THAT'S CORRECT.

16 Q. AND YOU SAID SOME WILL TRANSFER BUT YOU KNOW
17 THAT SOME WON'T END UP TRANSFERRING, CORRECT?

18 A. I IMAGINE SO.

19 Q. AND FOR SOME NUMBER OF KIDS THEY WILL END UP
20 HAVING TO SWITCH HOMES, POSSIBLY FOSTER PARENTS THEY ARE
21 WITH, CORRECT?

22 A. WELL, YEAH, I THINK AS YOU HEARD THIS MORNING
23 FROM MS. FIGUEROA, IT'S A DYNAMIC BUSINESS, SO KIDS ARE
24 KIND OF COMING AND GOING FROM THESE HOMES ALL THE TIME.
25 SO, YOU KNOW, IF THEY HAVE 130 -- IF THEY HAVE 120 KIDS

1 TODAY, A YEAR FROM NOW JUST IN THE ORDINARY COURSE OF
2 THINGS, EASILY HALF OF THOSE KIDS WON'T EVEN BE IN CARE,
3 RIGHT? SO SOME OF THIS -- IT'S JUST THE NATURAL
4 ATTRITION OF KIDS GOING HOME. THE GENERAL PREFERENCE OF
5 THE SYSTEM IS FOR KIDS TO GO HOME. THERE'S A CONSTANT
6 PRESSURE. IT'S IN FEDERAL LAW, IT'S IN STATE LAW, IT'S
7 IN EVERYBODY'S KIND OF AWARENESS OF IT, WE ARE TRYING TO
8 GET THEM AT HOME.

9 SO YOU SAID WILL SOME BE TURNED ONTO THE
10 STREET OR WILL SOME BE PERHAPS -- LISTEN HERE, WILL SOME
11 HAVE TO GO SOMEWHERE ELSE? I SUPPOSE SO. WHAT THAT
12 NUMBER WILL BE, WE CAN'T KNOW.

13 Q. BUT TO YOUR MIND, ARE YOU SAYING THAT'S NOT THAT
14 BIG A DEAL?

15 A. BIG A DEAL FOR EVERY KID EVERY TIME THEY ARE
16 CHANGED, EXCEPT WHEN THE CHANGE IS FOR A GOOD REASON.
17 YOU KNOW, IT'S REFERENCED ALL THE TIME IN THE COURSE OF
18 THE LAST THREE DAYS, IS IT BAD FOR KIDS TO MOVE. WELL,
19 NOT IF THEY ARE IN A BAD HOME, RIGHT? WE START WITH THE
20 PREMISE THAT KIDS ARE REMOVED FROM BAD HOMES. WAS THE
21 MOVE FROM THEIR PARENT, WHO IS ABUSIVE, BAD? WELL, TO
22 THE KID IT MIGHT BE, RIGHT, BECAUSE KIDS, THEY LOVE EVEN
23 THEIR ABUSERS, RIGHT, FOR ALL THOSE REASONS THAT WE
24 KNOW.

25 Q. YOU HAVE NO REASON TO THINK THAT THE HOMES THEY

1 WOULD BE MOVED AWAY FROM WHILE THEY ARE CURRENTLY AT
2 CATHOLIC, THAT THOSE ARE BAD HOMES, DO YOU?

3 A. NO. AS I SAID BEFORE, THE THREE PEOPLE THAT YOU
4 HAD UP HERE ALL SEEM ENTIRELY NOBLE. I CAN'T -- I DON'T
5 THINK ANY OF US COULD ABSTRACTLY OR REMOTELY EVALUATE OR
6 VALUE THE -- IN A SENSE, THE BOND, THE WELL-BEING, HOW
7 THOSE KIDS ARE DOING IN THESE SEVERAL 120 HOMES. WE
8 HAVE TO IMAGINE THAT BECAUSE THEY ARE REGULARLY REVIEWED
9 AND BECAUSE THE COURTS HAVE APPROVED THEM THEY ARE AT
10 LEAST DECENT. BUT I CAN'T TELL IF IT WOULD BE A MAJOR
11 LOSS OR A MINOR ONE FOR THIS OR THAT KID TO LOSE THIS OR
12 THAT FOSTER HOME.

13 Q. SO THEN DO YOU ALSO THINK COMMISSIONER FIGUEROA
14 WAS WRONG WHEN SHE CLOSED INTAKE OVER CONCERNS ABOUT
15 CHILDREN HAVING TO EVENTUALLY TRANSFER AWAY FROM
16 CATHOLIC?

17 A. NO.

18 Q. HER REASON WAS THAT TRANSFERRING WOULD BE BAD.
19 DO YOU RECALL THAT?

20 MS. CORTES: OBJECTION.

21 THE COURT: OVERRULED.

22 THE WITNESS: YOU ASKED ABOUT CLOSING
23 INTAKE, NOT TRANSFER? IT'S NEW KIDS VERSUS CURRENT
24 KIDS?

25 BY MR. RIENZI:

1 Q. COMMISSIONER FIGUEROA'S TESTIMONY THIS MORNING,
2 AND I BELIEVE ON TUESDAY, WAS THAT SHE CLOSED INTAKE
3 BECAUSE IT WOULD NOT BE IN THE BEST INTEREST OF THE
4 CHILDREN TO BE PLACED IN HOMES WITH CATHOLIC WHEN THEY
5 MAY EVENTUALLY NEED TO BE TRANSFERRED OUT OF HOMES.

6 A. OH, YEAH, YEAH. THAT'S RIGHT, I REMEMBER THAT
7 POINT. I THOUGHT IT WAS LAST NIGHT THAT SHE MADE THAT
8 POINT, BUT WHENEVER SHE MADE IT. SO WHAT SHE SAID --
9 WHAT I CAME AWAY UNDERSTANDING OF THAT POINT, IF I GET
10 THIS RIGHT, IS UNTIL WE SORT OUT THIS PROBLEM, WE OUGHT
11 NOT TO PUT, IN A SENSE -- WE SHOULD NOT HAVE TO PUT MORE
12 CHILDREN INTO THE PROBLEM.

13 Q. BECAUSE IT IS A PROBLEM IF THEY HAVE TO TRANSFER
14 AWAY WHEN CATHOLIC CLOSES, CORRECT?

15 A. IT CERTAINLY MIGHT BE A PROBLEM. AS I SAID,
16 EVERY TRANSFER -- YOU KNOW, WE START FROM THE PREMISE IN
17 CHILD WELFARE THAT PERMANENCY AND STABILITY ARE BASELINE
18 PREMISES, SO WE WANT A KID TO REMAIN IN A GOOD PLACE.
19 YOU ARE BUILDING RELATIONSHIPS. YOU WANT THE KID TO
20 HAVE A SENSE THAT WHEN HE LEAVES IN THE MORNING TO GO TO
21 SCHOOL, HE DOES NOT TO HAVE THINK ABOUT THAT HE IS
22 COMING BACK HERE TONIGHT. THAT'S WHAT WE MEAN BY
23 PERMANENCY IN THE SHORT ORDER. SO YEAH, IT'S BAD. WE
24 TRY TO AVOID TRANSFERS.

25 Q. TERRIFIC, THANK YOU.

1 YOU SAID BEFORE THAT YOU THOUGHT
2 CATHOLIC'S POLICY MAY HAVE AN EFFECT OF DISSUADING SOME
3 LGBTQ PARENTS FROM ENTERING THE SYSTEM AT ALL. IN OTHER
4 WORDS, NOT JUST WITH CATHOLIC, BUT ELSEWHERE?

5 A. YES.

6 Q. IS THAT CORRECT, IS THAT WHAT YOU SAID?

7 A. YES.

8 Q. YOU SAID "MAY" BECAUSE YOU DON'T ACTUALLY REALLY
9 KNOW, CORRECT?

10 A. THAT'S CORRECT.

11 Q. AND YOU ALSO SAID YOU THINK IT WILL HAVE A
12 TERRIBLE EFFECT ON KIDS IN THE SYSTEM. AND YOU DON'T
13 ACTUALLY KNOW THAT EITHER, DO YOU?

14 A. WELL, SO I HAVE HAD A BUNCH OF CONVERSATIONS
15 WITH KIDS OVER THE YEARS, YOU KNOW, 15, 20, MAYBE 30, IN
16 WHICH KIDS HAVE TALKED ABOUT -- I HAVE CERTAINLY
17 OBSERVED THEM AS WELL, IN A SENSE, SPEAKING TO LARGE
18 GROUPS IN KIND OF A LECTURE FORMAT. WE SOMETIMES HAVE
19 KIDS TRAIN LAWYERS. WE THINK IT'S -- AND IT WORKS, IT'S
20 JUST A REALLY NEAT DYNAMIC. AND THEY TALK ABOUT THE
21 EXPERIENCE OF BEING DISCRIMINATED AGAINST IN THE CHILD
22 WELFARE SYSTEM. AND WE ASK THEM, WELL, WHAT WAS YOUR
23 EXPERIENCE IN THE CHILD WELFARE SYSTEM? THEY SAY, IT
24 WAS BAD. I WAS DISCRIMINATED AGAINST. SO THEY DON'T
25 THINK ABOUT IT JUST IN TERMS OF THE BAD ACTOR WHO

1 DISCRIMINATED AGAINST THEM, THEY THINK ABOUT THEIR TIME
2 IN CARE AND THEY THINK ABOUT THE WHOLE SYSTEM. THEY
3 THINK OF IT, IN A SENSE, ALL OF A PIECE. SO THAT'S
4 REALLY WHAT I WAS REFERENCING AND I THINK THEY WILL SEE
5 IT AS BAD.

6 Q. AND IN THOSE CONVERSATIONS, NONE OF THEM
7 MENTIONED CATHOLIC'S VIEW THAT IT WOULD NOT DO HOME
8 STUDIES FOR LGBTQ COUPLES, CORRECT?

9 A. THAT'S CORRECT.

10 Q. I HEARD YOU TO BE SAYING THAT YOUR CONCERN ABOUT
11 THE EFFECT ON KIDS IS THAT THEY WILL KNOW THAT IN THE
12 SYSTEM THERE'S AN ENTITY OR AN ACTOR WHO IS NOT
13 AFFIRMING OF THEIR SEXUAL ORIENTATION, IS THAT ACCURATE?
14 I DON'T WANT TO PUT WORDS IN YOUR MOUTH. I AM JUST
15 TRYING -- THAT'S CORRECT?

16 A. UM-HUM.

17 Q. AS LONG AS THE CATHOLIC CHURCH MAINTAINS ITS
18 CURRENT TEACHINGS ON SEXUALITY, WON'T KIDS KNOW THAT
19 JUST BY SEEING THE NAME CATHOLIC?

20 A. THEY MIGHT.

21 Q. SO DO YOU THINK CATHOLIC ITSELF NEEDS TO BE OUT
22 OF THE FOSTER CARE BUSINESS ENTIRELY, BASED ON YOUR
23 ARGUMENT?

24 A. I REALLY HAVE NO OPINION ON THAT. I WOULD LOVE
25 FOR THEM TO STAY IN THE BUSINESS. I WOULD LOVE FOR THEM

1 TO APPROACH SAME-SEX MARRIAGES DIFFERENTLY.

2 Q. YOU DISAGREE WITH THE CATHOLIC CHURCH'S
3 RELIGIOUS TEACHINGS ON THAT?

4 MS. CORTES: OBJECTION TO THE RELEVANCE.

5 THE COURT: SUSTAINED.

6 MR. RIENZI: YOUR HONOR, HIS VIEWS ON THE
7 CATHOLIC CHURCH'S TEACHINGS ABOUT SAME-SEX MARRIAGE,
8 WHEN HE IS SAYING HE THINKS CATHOLIC HAS THE WRONG VIEW
9 TO REMAIN IN THE FOSTER SYSTEM.

10 THE COURT: HE DIDN'T SAY THAT. WHAT HE
11 SAID WAS HE WOULD HOPE THAT THEY WOULD CHANGE THEIR VIEW
12 AND THEY WOULD WELCOME SAME-SEX PARENTS.
13 BY MR. RIENZI:

14 Q. IF I CAN JUST PIN THAT DOWN. SO YOU WOULD HOPE
15 THAT THE CATHOLICS CHURCH WOULD CHANGE ITS VIEWS ON
16 SAME-SEX MARRIAGE, CORRECT?

17 A. I AM NOT ONE TO BELIEVE THAT THE CATHOLIC CHURCH
18 IS A MONOLITH, SO I AM RELUCTANT TO TALK ABOUT THE
19 CATHOLIC CHURCH AND ITS TEACHINGS.

20 Q. HOW ABOUT THE CATECHISM?

21 MS. CORTES: OBJECTION.

22 THE COURT: WELL, NOW WE ARE REALLY GOING
23 FAR AFIELD.

24 MR. RIENZI: YOUR HONOR, WITH ALL DUE
25 RESPECT --

1 THE COURT: LET'S JUST GO TO CATHOLIC
2 SOCIAL SERVICES.

3 BY MR. RIENZI:

4 Q. DO YOU THINK CATHOLIC SOCIAL SERVICES NEEDS TO
5 CHANGE ITS BELIEFS ON SEXUALITY AND MARRIAGE?

6 A. I WOULD LOVE FOR THEM TO.

7 Q. AND YOU TALKED ABOUT KIDS' EXPERIENCE IN HOMES
8 THAT YOU SAID WERE NOT LGBT AFFIRMING, IS THAT FAIR?

9 A. SAY THAT AGAIN.

10 Q. IS THAT PART OF YOUR EXPERIENCE THAT YOU WERE
11 TELLING US ABOUT?

12 A. SAY THAT AGAIN.

13 Q. EARLIER YOU TESTIFIED ABOUT THE EXPERIENCE OF
14 LGBT KIDS IN HOMES THAT WERE NOT AFFIRMING, CORRECT?

15 A. YES.

16 Q. IS IT YOUR VIEW THAT FOSTER PARENTS WHO
17 SUBSCRIBE TO THE TEACHINGS OF THE CATHOLIC CHURCH AND
18 THE CATECHISM ARE UNFIT TO BE FOSTER PARENTS BECAUSE
19 THEY WOULD NOT BE LGBT AFFIRMING?

20 MS. CORTES: OBJECTION.

21 THE COURT: SUSTAINED.

22 BY MR. RIENZI:

23 Q. DO YOU THINK THERE ARE RELIGIOUS VIEWS THAT IN
24 YOUR MIND SHOULD DISQUALIFY PEOPLE FROM BEING FOSTER
25 PARENTS?

1 MS. CORTES: OBJECTION.

2 THE COURT: SUSTAINED.

3 BY MR. RIENZI:

4 Q. YOU SAID YOU WORRIED ABOUT THE MESSAGE IT WOULD
5 SEND TO LGBT KIDS IF CATHOLIC SOCIAL SERVICES WERE
6 PERMITTED TO CONTINUE ACTING ACCORDING TO ITS FAITH.
7 HAVE YOU THOUGHT ABOUT THE IMPACT ON CATHOLIC FOSTER
8 PARENTS AND CATHOLIC KIDS OF THE CITY EXCLUDING CATHOLIC
9 SOCIAL SERVICES FROM FOSTER CARE?

10 MS. CORTES: OBJECTION, MISCHARACTERIZES
11 HIS TESTIMONY AND IT'S A COMPOUND QUESTION.

12 THE COURT: YES, BREAK IT DOWN, PLEASE.

13 BY MR. RIENZI:

14 Q. YOU TESTIFIED EARLIER ABOUT THE IMPACT THAT
15 ALLOWING CATHOLIC TO CONTINUE WOULD HAVE ON LGBT KIDS,
16 CORRECT?

17 A. YES.

18 Q. AND YOUR VIEW IS THAT IF THE CITY ALLOWS
19 CATHOLIC TO CONTINUE OPERATING ACCORDING ITS RELIGIOUS
20 BELIEFS, THAT WOULD BE HARMFUL FOR KIDS, CORRECT?

21 MS. CORTES: OBJECTION, THAT
22 MISCHARACTERIZES HIS TESTIMONY.

23 THE COURT: OVERRULED. HE CAN EXPLAIN
24 THAT ANSWER.

25 THE WITNESS: YES.

1 BY MR. RIENZI:

2 Q. AND YOU SAID IT MAY -- TO BE FAIR, I DON'T WANT
3 TO PUT WORDS IN YOUR MOUTH. YOU SAID IT MAY, BUT YOU
4 DIDN'T ACTUALLY KNOW, CORRECT?

5 A. RIGHT.

6 Q. HAVE YOU THOUGHT ABOUT THE IMPACT THAT IT WOULD
7 HAVE ON CATHOLIC KIDS FOR THE CITY TO EXCLUDE CATHOLIC
8 SOCIAL SERVICES FROM FOSTER CARE?

9 THE COURT: ASSUMING THAT THEY ARE NOT
10 LGBTQ?

11 MR. RIENZI: EITHER WAY, ACTUALLY. I
12 DON'T MEAN TO SPECIFY. I JUST MEAN CATHOLIC, I DON'T
13 MEAN TO SPECIFY.

14 THE WITNESS: WELL, IF WE ARE TALKING
15 ABOUT CATHOLIC KIDS -- I HAVE MET A LOT OF CATHOLIC KIDS
16 IN MY LIFE, I CAN'T RECALL ONE THAT HAS THE PROBLEM WITH
17 SAME-SEX MARRIAGE THAT THE CHURCH DOES, SO I DON'T THINK
18 THE EFFECT WOULD BE NEGATIVE ON CATHOLIC KIDS IF CSS
19 CHANGED ITS PRACTICE.

20 BY MR. RIENZI:

21 Q. HOW ABOUT CATHOLIC FOSTER PARENTS?

22 A. YOU KNOW, I DID NOT HEAR IN YOUR WITNESSES AND I
23 DON'T KNOW HOW OTHER CATHOLIC FOSTER PARENTS COME DOWN
24 ON THE QUESTION OF SAME-SEX MARRIAGE. THEY -- I WAS
25 ACTUALLY INTERESTED IN WHETHER YOUR WITNESSES WERE GOING

1 TO GO THERE, AND I THINK I HEARD THEM SAY THAT THEY
2 BELIEVE IN THE TEACHINGS OF THE CATHOLIC CHURCH. AND I
3 CAME AWAY THINKING THAT WAS A FAIRLY GENERIC STATEMENT.
4 AND AS A CATHOLIC MYSELF, I BELIEVE IN THE TEACHINGS OF
5 THE CATHOLIC CHURCH, TOO, JUST NOT ALL OF THEM, SO --
6 AND THAT'S MY EXPERIENCE WITH CATHOLICS IN GENERAL, THAT
7 WE ARE A BIT SELECTIVE IN OUR FOLLOWINGS OF THE
8 TEACHINGS OF THE CHURCH. SO I WOULD EXPECT THAT FOSTER
9 PARENTS WOULD BE SIMILAR.

10 Q. BUT SOME MAY NOT BE, CORRECT?

11 A. I WOULD HAVE TO IMAGINE, SURE.

12 MR. RIENZI: YOUR HONOR, IF I CAN JUST
13 HAVE ONE QUICK MINUTE, PLEASE?

14 THE COURT: YES.

15 (BRIEF PAUSE IN THE PROCEEDING.)

16 BY MR. RIENZI:

17 Q. MR. CERVONE, YOU SAID YOU HAVE KNOWN CATHOLIC
18 SOCIAL SERVICES FOR A LONG TIME?

19 A. YES.

20 Q. WHAT IS YOUR OVERALL OPINION OF CATHOLIC SOCIAL
21 SERVICES?

22 A. VERY POSITIVE.

23 MS. CORTES: OBJECTION AS TO RELEVANCE.

24 THE COURT: OVERRULED.

25 BY MR. RIENZI:

1 Q. AND YOU SAID YOU HAVE KNOWN MR. AMATO FOR A LONG
2 TIME?

3 A. YES.

4 Q. AND I UNDERSTAND YOU DISAGREE WITH SOME OF THE
5 -- YOU DIDN'T LIKE SOME OF THE THINGS HE SAID YESTERDAY,
6 CORRECT?

7 A. YES.

8 Q. DO YOU THINK HE IS AN HONEST GUY?

9 A. YES.

10 Q. AND SO YOU DON'T THINK HE IS LYING WHEN HE
11 TESTIFIES, CORRECT?

12 A. I WOULD NEVER CALL JIM AMATO A LIAR. I HAVE NO
13 IDEA HOW HE FEELS ABOUT THE ISSUES HE TESTIFIED TO.

14 MR. RIENZI: NOTHING FURTHER, YOUR HONOR.

15 THE COURT: OKAY. ANY OTHER QUESTIONS?

16 MS. CORTES: NO, YOUR HONOR.

17 THE COURT: THANK YOU.

18 THE WITNESS: THANK YOU, JUDGE.

19 MS. CORTES: AND, YOUR HONOR, WITH MR.

20 CERVONE'S TESTIMONY, THE DEFENDANTS WOULD LIKE TO MARK

21 EXHIBITS, ALL THE EXHIBITS THAT THE DEFENDANTS HAVE

22 MARKED. I BELIEVE IT'S 1 THROUGH 6, BUT I WILL DEFER TO

23 THE COURT RECORD ON THAT, AND WE WOULD ALSO WANT TO MAKE

24 SURE THAT PLAINTIFFS' EXHIBITS 13 AND 15 ARE MARKED AND

25 MOVED INTO THE RECORD ALONG WITH THE AFFIDAVITS OF MS.

1 KIMBERLY ALI AND COMMISSIONER CYNTHIA FIGUEROA.

2 MR. RIENZI: YOUR HONOR, WE WOULD OBJECT
3 ON THE DECLARATIONS OF THEIR WITNESSES AND WE WOULD
4 SIMPLY SAY -- WE ARE FINE IF WE WANT TO HAVE A RULE THAT
5 SAYS BOTH SIDES' DECLARATIONS OF THEIR WITNESSES COME
6 IN. THAT WAS WHAT WE WERE PROPOSING YESTERDAY, ON
7 TUESDAY, TO GET THE DECLARATIONS OF ALL WITNESSES IN,
8 BUT I DON'T SEE HOW WE COULD POSSIBLY HAVE RULE THAT
9 SAYS THE PLAINTIFFS' DECLARATIONS GET KEPT OUT, BUT THE
10 DEFENSE DECLARATIONS --

11 THE COURT: WELL, I BELIEVE THAT THE
12 COURT RULED THAT THE WITNESS WHO WAS NOT HERE TO
13 TESTIFY, HER AFFIDAVIT COULD BE ADMITTED. NOW, IF YOU
14 WISH TO HAVE -- I DON'T BELIEVE THAT THERE WAS A REQUEST
15 FOR THE OTHER AFFIDAVITS TO BE ADMITTED OF THE OTHER
16 WITNESSES WHO TESTIFIED.

17 MR. RIENZI: I APOLOGIZE, I MAY HAVE BEEN
18 UNCLEAR AT SOME POINT ABOUT THAT, BUT TO THE EXTENT WE
19 ARE DOING THIS NOW, I WOULD CERTAINLY MOVE THAT THE
20 DECLARATIONS OF OUR OTHER WITNESSES WHO TESTIFIED CAN BE
21 ADMITTED INTO THE RECORD. THEY ARE PROPERLY BEFORE THE
22 COURT. IT'S RULE 65, WHICH ALLOWS DECLARATIONS.

23 MR. FIELD: YOUR HONOR, IF I MIGHT, WE
24 HAD UNDERSTOOD THEIR REQUESTS AND THE COURT'S RULING
25 YESTERDAY TO BE THAT THE AFFIDAVITS OF THEIR WITNESSES

1 WHO DID TESTIFY WERE ALSO ADMITTED IN ADDITION TO DOE
2 FOSTER MOTHER NUMBER 1. IF THAT WAS NOT THE CASE, WE
3 WOULD NOT BE MAKING THE MOTION AS TO THE AFFIDAVITS OF
4 OUR WITNESSES WHO TESTIFIED.

5 THE COURT: OKAY. SO THE WITNESSES WILL
6 BE -- THE AFFIDAVITS WILL BE PERMITTED TO BE ADMITTED.

7 MR. RIENZI: TO MAKE SURE I AM CLEAR
8 BECAUSE I -- I THINK WE DID NOT HAVE --

9 MR. FIELD: TESTIFYING WITNESSES PLUS DOE
10 FOSTER MOTHER NUMBER 1.

11 MR. RIENZI: SO I THINK I CAN WITHDRAW MY
12 OBJECTION TO THE ALI AND FIGUEROA DECLARATIONS, BUT THEN
13 THE FULTON, PAUL, SIMMS-BUSCH, AMATO AND DOE MOTHER 1
14 DECLARATIONS, I THINK WE HAVE AGREEMENT THEY ARE ALL IN,
15 ALONG WITH ALI AND FIGUEROA.

16 THE COURT: WELL, NOT AGREEMENT AS TO DOE
17 MOTHER 1.

18 MR. RIENZI: DOE MOTHER 1 YOU PERMITTED.

19 THE COURT: I PERMITTED THAT.

20 MR. RIENZI: SO THEN YES, I WITHDRAW MY
21 OBJECTION TO THEIRS, AS LONG AS WE ARE CLEAR ON THE
22 UNDERSTANDING AS TO ALL OF OUR DECLARATIONS.

23 THE COURT: OKAY.

24 MS. CORTES: THAT WOULD BE IT, YOUR
25 HONOR. THEN WE WOULD REST.

1 YOUR HONOR, JUST TO MAKE THE RECORD
2 CLEAR, AND I AM ASSUMING NO OBJECTION FROM MR. RIENZI,
3 WE WOULD ALSO MOVE -- I THINK I SAID THIS, BUT JUST TO
4 BE ABUNDANTLY CLEAR, I WOULD MARK AND MOVE TO ADMIT
5 PLAINTIFF'S EXHIBIT 13 AND 15 INTO EVIDENCE.

6 THE COURT: YES, I BELIEVE THAT THEY WERE
7 ADMITTED PREVIOUSLY.

8 MR. RIENZI: AND, YOUR HONOR, TO THE
9 EXTENT THERE WAS ANY LACK OF CLARITY, I WOULD ALSO MOVE
10 TO ADMIT ALL OF THE EXHIBITS THAT WE HAD IN, OBVIOUSLY
11 WITH THE EXCEPTION OF THE TWEETS THAT WE HAD THE OFFER
12 OF PROOF ON EARLIER THIS MORNING.

13 THE COURT: YES. THE TWEETS -- SOME OF
14 THEM WERE MARKED, SOME OF THEM WERE NOT MARKED, BUT THEY
15 ARE PART OF THE RECORD.

16 MR. RIENZI: THANK YOU, YOUR HONOR.

17 THE COURT: OKAY. BEFORE WE PROCEED TO
18 CLOSING, IS THERE ANYTHING FURTHER FROM THE PLAINTIFF?

19 MR. RIENZI: NOTHING ON EVIDENCE, YOUR
20 HONOR. ONE HOUSEKEEPING DETAIL I JUST WANTED TO BE
21 CLEAR ON. I UNDERSTAND OUR DEADLINE FOR RESPONDING TO
22 THE MOTION TO INTERVENE TO BE FRIDAY, JUNE 29TH, AND I
23 AM CALCULATING THAT BASED ON WHEN WE ACTUALLY RECEIVE
24 THE BRIEF. IF YOU RECALL, THERE WAS AN EARLIER FILING
25 THAT ESSENTIALLY ALERTED EVERYBODY -- AND I APPRECIATE

1 IT, ALERTED EVERYBODY THAT SOMETHING WOULD BE COMING.
2 AND I JUST WANT TO MAKE SURE THE COURT IS NOT THINKING
3 THAT OUR DEADLINE RUNS FROM THAT EARLIER ALERT. I
4 ASSUME WE GET THE TWO WEEKS FROM WHEN THEY ACTUALLY
5 FILED THE MOVING PAPERS.

6 MS. ROPER: NO OBJECTION FROM THE
7 POTENTIAL INTERVENORS.

8 THE COURT: OKAY. THAT'S 6/29?

9 MR. RIENZI: THAT'S WHAT I HAVE, YOUR
10 HONOR.

11 THE COURT: BEFORE THE COURT HEARS
12 CLOSING ARGUMENTS, I BELIEVE THAT WE HAVE A REQUEST FROM
13 THE -- AT THIS POINT THE ACLU TO ADDRESS THE COURT?

14 MS. ROPER: YES, YOUR HONOR, THE ACLU AND
15 THE PARTIES THAT REPRESENTS AS AMICI PHILADELPHIA FAMILY
16 PRIDE. BUT ESSENTIALLY, YES, YOUR HONOR, AN ATTORNEY
17 FROM THE ACLU WOULD ARGUE.

18 THE COURT: THE COURT IS INCLINED TO
19 PERMIT IT, BUT I GUESS THE QUESTION IS AT WHAT POINT. I
20 THINK IT WOULD BE APPROPRIATE TO LET THE PLAINTIFFS
21 PROCEED, THEN HEAR FROM THE DEFENSE, THE AMICI, AND THEN
22 ANY RESPONSE THAT COUNSEL FOR PLAINTIFFS WISH TO MAKE.

23 MS. ROPER: IT CERTAINLY SUITS US, YOUR
24 HONOR. WE DON'T INTEND TO REPEAT THINGS THE CITY HAS
25 ALREADY SAID. WE WILL TRY TO RESPECT EVERYBODY'S TIME.

1 THE COURT: WILL COUNSEL NEED A FEW
2 MINUTES BEFORE WE PROCEED?

3 MR. RIENZI: I WOULD LOVE A FEW MINUTES
4 BEFORE WE START.

5 THE COURT: OKAY, THEN WE WILL TAKE A FEW
6 MINUTES.

7 MR. RIENZI: THANK YOU VERY MUCH.

8 MS. CORTES: THANK YOU, YOUR HONOR.

9 (BRIEF RECESS.)

10 THE COURT: ARE WE READY TO PROCEED?

11 MR. RIENZI: I AM, YOUR HONOR.

12 THANK YOU, YOUR HONOR. AS YOU KNOW, WE
13 ARE HERE ON PLAINTIFFS' MOTION FOR A TEMPORARY
14 RESTRAINING ORDER OR A PRELIMINARY INJUNCTION. AS YOU
15 HAVE HEARD FROM THE WITNESSES, THE SITUATION IS URGENT.
16 RIGHT NOW THERE IS ONGOING HARM. THERE ARE BEDS THAT
17 ARE EMPTY FROM PARENTS WHO WORK WITH CATHOLIC SOCIAL
18 SERVICES TO WHOM THE CITY IS REFUSING TO SEND CHILDREN,
19 NOT BECAUSE THE CITY THINKS THOSE ARE BAD HOMES, BECAUSE
20 THE CITY IS FREEZING INTAKE TO THOSE HOUSES BECAUSE OF A
21 SEPARATE FIGHT. RIGHT NOW THERE ARE ACTUALLY CHILDREN
22 IN CONGREGATE CARE AND ELSEWHERE WHOSE LIVES WOULD BE
23 IMPROVED IF THEY WERE PLACED IN THOSE HOMES, AND THEY
24 ARE NOT BEING PLACED IN THOSE HOMES. WE KNOW ABOUT SOME
25 OF THEM. WE KNOW SOME OF THEIR NAMES. WE KNOW DOE

1 CHILD 1 BECAUSE WE FOUND OUT ABOUT DOE CHILD 1. THERE
2 ARE A LOT OF KIDS WHOSE NAMES WE DON'T KNOW WHO COULD BE
3 IN THOSE HOMES. YOU HEARD JIM AMATO TESTIFY THAT
4 TYPICALLY THEY NEVER HAVE MORE THAN FOUR OR FIVE
5 VACANCIES AND NOW THEY ARE GETTING UP TO 26. WELL, I
6 DON'T KNOW THE NAMES OF THOSE KIDS, BUT THOSE ARE REAL
7 HUMAN BEINGS, THEY BELONG IN GOOD FOSTER HOMES, THERE
8 ARE LOVING HOMES AVAILABLE, AND BECAUSE OF THE CITY'S
9 VIOLATION OF THE LAW, THEY ARE NOT ALLOWED TO BE THERE.

10 YOU HEARD MRS. PAUL TESTIFY ABOUT THE
11 HARM TO HER, ABOUT THE FACT THAT THIS IS HER GIFT, THIS
12 IS WHAT SHE DOES FOR THE WORLD. SHE HAS DONE IT FOR 133
13 CHILDREN. SHE WANTS TO CONTINUE PARTICIPATING, THE CITY
14 WILL NOT SEND CHILDREN HER WAY. YOU HEARD JAMES AMATO
15 TESTIFY ABOUT HOW THE JUNE 30TH DEADLINE WILL IMPACT,
16 HOW LAYOFFS WILL NEED TO START SOON WITHOUT NEW
17 REFERRALS, HOW THE FOSTER PROGRAM WILL NEED TO SHUT DOWN
18 WITHIN A MATTER OF MONTHS.

19 THE CITY SAYS IT WILL ACCEPT A NEW
20 CONTRACT, BUT IT WILL ONLY ACCEPT A NEW CONTRACT THAT
21 EITHER A, INVOLVES CATHOLIC AGREEING TO VIOLATE ITS
22 RELIGIOUS BELIEFS, WHICH IT SIMPLY CANNOT DO. OR B,
23 REQUIRES CATHOLIC TO PROCEED WITH NO REFERRALS, WHICH IS
24 SUICIDE FOR THE FOSTER AGENCY. SO THE SITUATION IS
25 DIRE, THE HARM IS REAL, THERE ARE ACTUAL HUMAN BEINGS

1 WHO ARE AND WILL CONTINUE TO SUFFER WITHOUT RELIEF.

2 FORTUNATELY, STATE AND FEDERAL LAW MAKE
3 THE CITY'S ACTIONS ILLEGAL AND PROVIDE A FIRM BASIS FOR
4 A TEMPORARY RESTRAINING ORDER OR A PRELIMINARY
5 INJUNCTION. SIMPLY PUT, THE GOVERNMENT IS ONLY ALLOWED
6 TO FORCE SOMEBODY TO VIOLATE THEIR RELIGIOUS BELIEFS,
7 WHICH IS PRECISELY WHAT THE CITY IS TRYING TO DO.
8 GOVERNMENTS ARE ONLY ALLOWED TO PUT SOMEBODY IN THAT
9 POSITION IF THEY HAVE A COMPELLING GOVERNMENT INTEREST
10 AND THEY ARE USING THE LEAST RESTRICTIVE MEANS TO PURSUE
11 THAT INTEREST. AND WHAT THE TESTIMONY MADE CLEAR OVER
12 AND OVER AGAIN IS THAT THE GOVERNMENT'S CASE IS NOWHERE
13 CLOSE TO THOSE STANDARDS.

14 LET ME START WITH THE RELIGIOUS FREEDOM
15 PROTECTION ACT. THIS IS THE PENNSYLVANIA STATUTE. IT
16 IS PARALLEL TO THE FEDERAL RFRA STATUTE THAT THE SUPREME
17 COURT HAS RECENTLY INTERPRETED IN SEVERAL CASES. WHAT
18 THE PENNSYLVANIA RFRA SAYS IS THAT THE GOVERNMENT CANNOT
19 IMPOSE A SUBSTANTIAL BURDEN ON SOMEONE'S SINCERE
20 RELIGIOUS EXERCISE UNLESS IT HAS A COMPELLING GOVERNMENT
21 INTEREST, AND THE GOVERNMENT HAS TO DEMONSTRATE THAT.
22 THE GOVERNMENT MUST DEMONSTRATE A COMPELLING GOVERNMENT
23 INTEREST AND THAT IT IS USING THE LEAST RESTRICTIVE
24 MEANS.

25 FIRST, SINCERE RELIGIOUS EXERCISE. I

1 THINK THAT MIGHT BE THE ONLY THING OR ONE OF THE FEW
2 THINGS THAT THERE IS NO DISPUTE IN THE COURTROOM IN
3 FRONT OF YOUR HONOR OVER THE LAST THREE DAYS. I DON'T
4 THERE IS ANY DOUBT THAT CATHOLIC IS ENGAGED IN A SINCERE
5 RELIGIOUS EXERCISE. THERE ARE FOLKS WHO DISAGREE WITH
6 THAT EXERCISE. THERE ARE FOLKS WHO THINK THEY SHOULD
7 HAVE A DIFFERENT VIEW OF THEIR RELIGIOUS PRINCIPLES, BUT
8 I DID NOT HEAR ANYONE TO SUGGEST THAT CATHOLIC WAS
9 ACTING ON ANYTHING OTHER THAN ITS SINCERE RELIGIOUS
10 BELIEFS.

11 PENNSYLVANIA LAW GIVES FOUR WAYS IN WHICH
12 A GOVERNMENT ACTION CAN IMPOSE A SUBSTANTIAL BURDEN, AND
13 HERE EVERY ONE OF THEM IS MET. ONE ALONE WOULD DO, BUT
14 ALL FOUR ARE MET. THE GOVERNMENT'S ACTION CONSTRAINS OR
15 INHIBITS CONDUCT OR ITS EXPRESSION MANDATED BY A
16 PERSON'S SINCERELY-HELD RELIGIOUS BELIEFS. THAT'S THE
17 CASE HERE. CATHOLIC TAKES CARE OF CHILDREN BECAUSE OF
18 JESUS' INJUNCTION TO TAKE CARE OF CHILDREN AND TO TAKE
19 CARE OF WIDOWS AND ORPHANS, IN THE BIBLE. IT'S
20 OBVIOUSLY SINCERE RELIGIOUS BELIEF.

21 THEIR BELIEFS ABOUT SEX AND MARRIAGE ARE
22 ALSO SINCERE RELIGIOUS BELIEFS. THERE HAS BEEN NO CLAIM
23 THAT IT IS ANYTHING OTHER THAN A SINCERE BELIEF THAT
24 THEY ARE ACTING ON. SIGNIFICANTLY CURTAILS A PERSON'S
25 ABILITY TO EXPRESS ADHERENCE TO THE PERSON'S RELIGIOUS

1 FAITH. WELL, BY FORCING CATHOLIC TO CERTIFY THE
2 RELATIONSHIPS OF SAME-SEX COUPLES, THE GOVERNMENT WOULD
3 BE CURTAILING CATHOLIC'S ABILITY TO EXPRESS ADHERENCE TO
4 THEIR RELIGIOUS FAITH. THEY WOULD BE FORCING THEM AS A
5 REQUIREMENT TO HELP KIDS TO PUBLICLY VIOLATE THEIR
6 RELIGIOUS BELIEFS.

7 AND TO BE CLEAR, CATHOLIC IS NOT SAYING,
8 I NEED TO GO IN AND TELL EVERYBODY COUPLE A OR COUPLE B
9 IS A BAD COUPLE. CATHOLIC IS NOT RUSHING TO SAY, LET ME
10 GO PASS JUDGMENT. CATHOLIC IS SAYING, PLEASE LET ME
11 STAND ASIDE. PLEASE LET ME STAND ASIDE. I DON'T WANT
12 TO HAVE TO SIT DOWN AND WRITE EVALUATIONS OF SOME
13 COUPLE'S LIFE THAT MY CHURCH DISAGREES WITH. I DON'T
14 WANT TO WRITE THAT. AND SO CATHOLIC FOR YEARS HAS JUST
15 HAD THE POSITION THAT IF SOMEBODY COMES AND ASKS ME, I
16 AM JUST GOING TO STEP ASIDE, RIGHT.

17 THEY ARE NOT GOING TO SAY, NO, YOU CAN'T
18 BE A FOSTER PARENT. THEY JUST WANT TO SAY I HAVE GOT
19 RELIGIOUS BELIEFS THAT DON'T MATCH WITH WHAT YOU WANT TO
20 DO, AND SO I AM NOT REALLY THE RIGHT PERSON TO WRITE
21 THIS UP FOR YOU. BUT GUESS WHAT, THERE ARE 28 OTHERS IN
22 THE CITY WHO ARE HAPPY TO DO IT. NOW, THAT'S UTTERLY
23 HYPOTHETICAL, YOUR HONOR. IT'S UTTERLY HYPOTHETICAL.
24 WE TALKED ABOUT SPECULATION A LOT WHEN PEOPLE WERE
25 OBJECTING TO EACH OTHER'S QUESTIONS. THE WHOLE

1 CONTROVERSY IS SPECULATIVE BECAUSE THERE IS NO EVIDENCE
2 OF A SINGLE ACTUAL APPLICANT EVER. NO EVIDENCE OF A
3 SINGLE ACTUAL APPLICANT EVER WHO HAS ASKED CATHOLIC TO
4 DO A HOME STUDY FOR FOSTER CARE AND WHO CATHOLIC HAS
5 REFERRED AWAY. THERE'S NOT ONE, BECAUSE IT'S A
6 HYPOTHETICAL DISPUTE. IN THAT HYPOTHETICAL DISPUTE,
7 CATHOLIC'S RELIGIOUS BELIEFS ARE CLEAR AND THEIR
8 RELIGIOUS EXERCISE WOULD BE CLEAR. THEY WOULD SAY, I
9 CAN'T DO IT. BUT IT'S NEVER HAPPENED.

10 IT'S ALSO A SUBSTANTIAL BURDEN IF THE
11 GOVERNMENT DENIES A PERSON THE REASONABLE OPPORTUNITY TO
12 ENGAGE IN ACTIVITIES WHICH ARE FUNDAMENTAL TO THE
13 PERSON'S RELIGION. WELL, TAKING CARE OF ORPHANS,
14 FUNDAMENTAL, FUNDAMENTAL TO THE CATHOLIC CHURCH'S
15 RELIGION. AND IT'S WORK THEY WERE DOING IN THE CITY
16 LONG BEFORE THE CITY WAS DOING THE WORK IN THE CITY.
17 THE CITY HAS IMPOSED A REGIME THAT SAYS, WELL, NOW YOU
18 CAN ONLY DO IT UNDER CONTRACT WITH ME, AND MOST OF THE
19 TIME CATHOLIC IS TOTALLY FINE TO DO IT THROUGH CONTRACT
20 WITH THE CITY. BUT ULTIMATELY THIS WAS CHURCH WORK LONG
21 BEFORE IT WAS CITY WORK. AND WHAT THE CITY IS SAYING
22 NOW IS WELL, YOU GOT TO VIOLATE A COUPLE OF YOUR
23 RELIGIOUS BELIEFS IF YOU WANT TO STILL TAKE CARE OF THE
24 KIDS. THAT'S WHAT THEY ARE SAYING, AND ON PENNSYLVANIA
25 LAW, THAT'S A SUBSTANTIAL BURDEN ON RELIGION.

1 THE FOURTH WAY YOU GET A SUBSTANTIAL
2 BURDEN COMPELS CONDUCT OR EXPRESSION WHICH VIOLATES A
3 SPECIFIC TENET OF A PERSON'S FAITH. AGAIN, THE SAME
4 THING, RIGHT. THE GOVERNMENT IS TRYING TO FORCE
5 CATHOLIC TO CERTIFY THINGS THAT IT JUST CAN'T CERTIFY
6 TO. AND AGAIN, CATHOLIC IS NOT RUSHING TO SAY, I WANT
7 TO GO CONDEMN, THEY ARE SAYING I WANT TO STAND ASIDE.
8 AND IF YOU LET ME STAND ASIDE, I WANT TO GO TAKE CARE OF
9 THOSE KIDS WHICH I HAVE BEEN DOING SINCE LONG BEFORE THE
10 CITY DID.

11 UNDER PENNSYLVANIA LAW, THE ONLY WAY THE
12 CITY CAN GET AWAY WITH IMPOSING THOSE BURDENS IS IF IT
13 HAS A COMPELLING GOVERNMENT INTEREST. HERE YOU SAW THE
14 EVIDENCE, THEY CAN'T COME CLOSE TO MEETING THAT BURDEN.
15 THEY CAN'T COME CLOSE TO MEETING IT. WHY NOT? A COUPLE
16 OF REASONS. ONE, THERE IS NO PROOF THAT ANYONE HAS EVER
17 BEEN HARMED. THERE'S NO PROOF A SINGLE SOUL HAS EVER
18 ASKED FOR THE SERVICE. ABSENT PROOF OF AT LEAST
19 SOMEBODY BEING HARMED, RIGHT. EVEN THE EXPERT AT THE
20 END, MR. CERVONE. TO HIS CREDIT, VERY HONEST MAN, SAID
21 AT THE END, I AM JUST -- I AM PARAPHRASING, BUT HE SAID
22 I SAID MAY, I DON'T REALLY KNOW. HE SAID MAY. HE DOES
23 NOT REALLY KNOW. THE CITY DOES NOT REALLY KNOW.

24 WHEN MS. ALI WAS ON THE STAND AND IT WAS
25 ASKED, IS THAT A REALLY IMPORTANT INTEREST -- OR I THINK

1 FIRST THE WORD WAS COMPELLING AND THEN THERE MAY HAVE
2 BEEN AN OBJECTION TO IT. BUT SHE WAS ASKED ABOUT THE
3 STRENGTH OF THAT INTEREST, WHAT'S THE STRENGTH OF YOUR
4 INTEREST IN MAKING SURE EVERY AGENCY DOES THE HOME
5 STUDIES? HER ANSWER WAS NOT, IT'S SUPREMELY IMPORTANT.
6 HER ANSWER WAS, IT'S AN INTEREST LIKE ANY OTHER INTEREST
7 THAT WE HAVE. THAT WAS HER ANSWER, IT'S IN THE
8 TRANSCRIPT FROM MONDAY AFTERNOON OR TUESDAY. IT WAS
9 NOT, THIS IS A SUPREMELY IMPORTANT INTEREST.

10 AND HERE IS HOW YOU ALSO KNOW THAT IT'S
11 NOT A SUPREMELY IMPORTANT INTEREST, NO WITNESS COULD
12 NAME ANY PLACE WHERE IT WAS EVER WRITTEN DOWN BEFORE,
13 RIGHT. AND THIS IS A THEME THAT RUNS THROUGHOUT THE
14 GOVERNMENT'S CASE. THEIR WHOLE CONTRACT ARGUMENT
15 DEPENDS ON FOSTER CARE BEING A PUBLIC ACCOMMODATION.
16 BEING A PUBLIC ACCOMMODATION, THEREFORE THE FAIR
17 PRACTICE ORDINANCE COVERS IT. WELL, THEY HAVE BEEN
18 RUNNING A FOSTER CARE SYSTEM FOR YEARS. BUT THERE IS NO
19 INDICATION ANYPLACE THAT THEY HAVE EVER TAKEN THE
20 POSITION THAT WHAT THEY WERE RUNNING IS A PUBLIC
21 ACCOMODATION, NO INDICATION THAT THEY EVER TOLD THE
22 AGENCIES IT WAS A PUBLIC ACCOMODATION. THERE'S JUST
23 NOTHING.

24 IF IT WERE A PUBLIC ACCOMODATION, YOU
25 COULD NOT DO ALL THE THINGS THAT THE STATE LAW REQUIRES

1 YOU TO DO, LIKE LOOK INTO SOMEBODY'S MENTAL STABILITY,
2 LOOK INTO SOMEBODY'S EXISTING FAMILY RELATIONSHIPS,
3 RIGHT. IMAGINE A WORLD WHERE YOU COULD DO THOSE THINGS
4 -- WELL, HERE IS HOW YOU KNOW IT'S NOT A PUBLIC
5 ACCOMMODATION. YOU CAN'T DO THOSE THINGS BEFORE SELLING
6 SOMEBODY A CUP OF COFFEE OR A TICKET ON THE TRAIN,
7 RIGHT. YOU CAN'T SAY, WELL, YOU ARE NOT COMING IN HERE
8 BECAUSE I THINK YOU HAVE A MENTAL DISABILITY. YOU CAN'T
9 SAY, YOU CAN'T COME IN HERE BECAUSE I HAVE EVALUATED
10 YOUR EXISTING FAMILY RELATIONSHIPS AND I DON'T THINK
11 THEY ARE THAT GREAT, RIGHT. YOU CAN'T DO THAT IN A REAL
12 PUBLIC ACCOMMODATION.

13 FOSTER CARE IS NOT A PUBLIC
14 ACCOMMODATION, NEVER HAS BEEN. IT'S A MADE-UP THEORY
15 FOR THIS CASE THAT NO ONE CAN POINT TO ANY DOCUMENT
16 ANYPLACE REFERENCING BEFORE THIS CASE. IT'S A NEWLY
17 MINTED THEORY FOR THIS CASE, BUT IT DOES NOT WORK.
18 BECAUSE BY DEFINITION FOSTER CARE IS NOT ABOUT EVERYBODY
19 WHO LINES UP AND WANTS IT GETS IT. IT'S ABOUT LOOKING
20 AFTER THE INTEREST OF CHILDREN. AND THE LAW HAS ALLOWED
21 FOR YEARS, FOR MANY YEARS, DIFFERENT AGENCIES WITH
22 DIFFERENT SPECIALTIES AND DIFFERENT REQUIREMENTS. STATE
23 LAW DOES NOT SAY, THESE ARE THE ONLY REQUIREMENTS AND
24 YOU MAY DO NO MORE. THAT IS NOT WHAT IT SAYS. STATE
25 LAW SAYS THAT YOU GET TO CONSIDER THESE THINGS. IT SAYS

1 YOU ALSO CAN CONSIDER AN APPLICANT'S ABILITY TO WORK
2 WITH THE AGENCY. AND IT CERTAINLY DOES NOT SAY YOU MAY
3 ADD NO MORE, RIGHT.

4 AND THE CITY'S OWN WEBPAGE, WHICH MAYBE
5 THEY WANT TO CHANGE NOW BECAUSE THEY REALIZE THAT IT'S
6 INCONSISTENT WITH THEIR THEORY HERE. THE CITY'S OWN
7 WEBPAGE SAYS THAT DIFFERENT AGENCIES CAN HAVE DIFFERENT
8 REQUIREMENTS. THE CITY'S WEBPAGE REFERS FOSTER -- THE
9 CITY'S FOSTER PARENT HANDBOOK REFERS THEM TO THAT STATE
10 ASSOCIATION. THAT STATE ASSOCIATION SAYS THESE ARE
11 MINIMUM REQUIREMENTS. EVERYTHING THAT PREDATES THIS
12 CONTROVERSY SAYS THAT AGENCIES ARE ALLOWED TO HAVE THEIR
13 OWN REQUIREMENTS AND THAT'S FINE. IT'S A JUDGMENT-CALL
14 TYPE OF SITUATION, NOT A PUBLIC ACCOMMODATION. NOT
15 EVERYBODY GETS ONE. IN REAL PUBLIC ACCOMMODATIONS, YOU
16 CAN'T CONSIDER THE RACE OF THE CHILD OR THE RACIAL
17 WISHES OF A FOSTER PARENT BEFORE PLACING THEM, BUT THEY
18 DO. YOU CAN'T CONSIDER THE DISABILITY OF SOMEBODY
19 BEFORE LETTING THEM DO SOMETHING, BUT THEY DO. THEY
20 HAVE NOT DONE TO SHUT ANYBODY DOWN, THEY HAVE NOT TURNED
21 OFF INTAKE TO THOSE PEOPLE BECAUSE IT'S NOT A PUBLIC
22 ACCOMODATION. IT'S A NEWLY MINTED ARGUMENT. IT HAS NO
23 BASIS IN THE WAY THEY HAVE DONE ANYTHING.

24 IF THAT WERE REAL, IF IT WERE ACTUALLY A
25 COMPELLING INTEREST TO ENFORCE THAT, THEY WOULD ENFORCE

1 IT ON RACE AND ON DISABILITY, AND THEY WOULD HAVE TALKED
2 ABOUT IT AND APPLIED IT TO THEMSELVES SOMETIME IN THE
3 PRECEDING YEARS. THEY MADE IT UP FOR THIS CASE, YOUR
4 HONOR, IT'S NOT REAL.

5 THE CITY ALSO LACKS A COMPELLING INTEREST
6 BECAUSE THEY HAVE NO EVIDENCE THAT ANYBODY HAS ACTUALLY
7 BEEN HARMED. AGAIN, THEY ARE CLAIMING TO RECTIFY A
8 HARM. THERE IS NO INDICATION ANYBODY HAS BEEN HARMED.
9 THERE IS NO INDICATION THAT SAME-SEX COUPLES ARE
10 KNOCKING ON THE DOOR OF THE CATHOLIC CHURCH AND SAYING,
11 HEY, CATHOLIC CHURCH, I WOULD LIKE YOU TO BE THE ONE WHO
12 COMES IN AND EVALUATES MY FAMILY RELATIONSHIPS, RIGHT.
13 THE CITY TELLS PEOPLE, GO LOOK FOR SOMEBODY WHO IS A
14 GOOD FIT, RIGHT, THEY SAY LOOK FOR SOMEBODY WHO IS A
15 GOOD FIT.

16 SO FAR AS WE KNOW, THERE HAVE BEEN NOT
17 SAME-SEX COUPLES WHO GO TO THE CATHOLIC CHURCH AND SAY,
18 COME ON INTO MY HOUSE AND TELL ME WHAT YOU THINK OF MY
19 FAMILY RELATIONSHIPS. THAT ACTUALLY IS NOT TERRIBLY
20 SURPRISING, RIGHT. THE CATHOLIC CHURCH HAS WELL-KNOWN
21 TEACHINGS ON SEXUALITY AND MARRIAGE, AND IT'S ENTIRELY
22 LIKELY THAT GAY FAMILIES DO NOT LOOK AT THE CATHOLIC
23 CHURCH AND SAY, I WOULD LIKE YOU TO COME IN AND EVALUATE
24 MY FAMILY LIFE. AND SO PEOPLE GO TO AGENCIES THAT ARE
25 GOOD FITS FOR THEM. RELIGIOUS CATHOLICS GO TO CATHOLIC.

1 THERE ARE -- AS COMMISSIONER FIGUEROA SAID, THERE ARE 28
2 AGENCIES IN THE CITY THAT PROVIDE HOME STUDIES FOR LGBT
3 COUPLES. ALTHOUGH SHE THINKS THAT'S TRUE, THEY ACTUALLY
4 NEVER CHECKED WITH MOST OF THE SECULAR AGENCIES, BUT SHE
5 THINKS THAT'S TRUE.

6 THERE IS NO INDICATION THAT THERE IS A
7 PROBLEM. THERE IS NO INDICATION THAT A SINGLE SOUL HAS
8 EVER BEEN DENIED THE ABILITY TO BE A FOSTER PARENT BY
9 CATHOLIC'S RELIGIOUS BELIEFS. AND SO IN LIGHT OF ALL OF
10 THAT, THEY SIMPLY DON'T HAVE A COMPELLING GOVERNMENT
11 INTEREST UNDER STATE LAW.

12 THEY CERTAINLY HAVE NOT USED THE LEAST
13 RESTRICTIVE MEANS AVAILABLE TO PURSUE THAT INTEREST.
14 THERE ARE OTHER WAYS TO LET PEOPLE BECOME FOSTER
15 PARENTS. THERE ARE LOTS OF AGENCIES, RIGHT. I THINK
16 IT'S VERY TELLING THE TESTIMONY YOU HEARD OVER THE LGBTQ
17 FOSTER PARENT RECRUITING EVENT IN THE MAYOR'S OFFICE OF
18 LGBT AFFAIRS. THE OFFICE OF LGBT AFFAIRS IS A PART OF
19 CITY GOVERNMENT AND IT EXISTS -- IT EXISTS TO SERVE LGBT
20 PEOPLE. AND THERE'S NOT A PROBLEM WITH THAT, THERE IS
21 NOTHING WRONG WITH THAT. WHY? BECAUSE IT'S NOT LIKE
22 PEOPLE WHO ARE NOT LGBT CAN'T GO GET GOVERNMENT
23 SERVICES. THEY CAN'T GET SERVICE FROM THAT OFFICE, BUT
24 THEY CAN GET SERVICE FROM ANY OTHER OFFICE AND IT'S
25 FINE. SO THE CITY DOES THAT DIRECTLY AS THE CITY, BUT

1 THE CITY IS SAYING THAT A NETWORK OF CONTRACTORS WHO ARE
2 PRIVATE ENTITIES, WHO ARE NOT THE CITY, SOME OF WHOM ARE
3 RELIGIOUS, THEY HAVE TO SERVE EVERYBODY ALL THE TIME,
4 RIGHT, THAT'S THE CLAIM. CATHOLIC CAN ONLY DO THIS IF
5 IT SERVES EVERYBODY ALL THE TIME.

6 AND I DON'T THINK IT'S JUST THAT THE CITY
7 WANTS THEM TO DO THE HOME STUDY, I ASSUME THE CITY WANTS
8 THEM TO DO THE HOME STUDY AND INSISTS -- AND INSISTS
9 THAT THEY SAY THAT THESE COUPLES RELATIONSHIPS ARE GOOD
10 AND THIS WOULD BE A GOOD PLACE TO RAISE CHILDREN.

11 THE COURT: NOW THAT'S SPECULATIVE.

12 MR. RIENZI: IT IS SPECULATIVE, YOUR
13 HONOR. BUT I DON'T THINK IT WOULD DO MUCH GOOD IF WHAT
14 THEY WERE SAYING WAS YOU HAVE GOT TO DO THE HOME STUDY,
15 BUT YOU ARE FREE TO SAY NO. MAYBE THAT'S THEIR IDEA,
16 BUT THEY SURE DON'T HAVE A COMPELLING INTEREST IN THAT,
17 RIGHT. IF WHAT THEY ARE SAYING IS YOU GOT TO DO THE
18 HOME STUDY, BUT WE DON'T CARE WHAT YOU SAY IN THE
19 OUTCOME AND YOU ARE ALLOWED TO SAY THAT I DON'T THINK
20 THIS IS A GOOD RELATIONSHIP. THEY REALLY COULD NOT
21 POSSIBLY HAVE A COMPELLING INTEREST IN THAT BECAUSE THAT
22 HELPS NOBODY. THAT WOULD REALLY JUST BE TRYING TO FORCE
23 A RELIGIOUS GROUP TO VIOLATE ITS BELIEFS WITH NO BENEFIT
24 TO ANYBODY. SO I DON'T THINK THAT'S WHAT THEY MEAN, BUT
25 I AGREE WITH YOU, AND TO BE CLEAR, I DON'T MEAN TO

1 SUGGEST THERE WAS EVIDENCE ON THAT POINT.

2 THE GOVERNMENT HAS ALSO VIOLATED THE FREE
3 EXERCISE CLAUSE. UNDER THE FREE EXERCISE CLAUSE, THE
4 GOVERNMENT CAN'T -- WELL, THE GOVERNMENT FACES STRICT
5 SCRUTINY IN SEVERAL DIFFERENT WAYS UNDER THE FREE
6 EXERCISE CLAUSE. FIRST, IT'S RULE THAT YOU MUST DO
7 EVERY HOME STUDY THAT SOMEBODY ASKS YOU FOR IS NOT A
8 NEUTRAL AND GENERALLY APPLICABLE RULE. NOBODY CAN FIND
9 ANY EXAMPLE OF WHEN THEY HAVE EVER SAID IT BEFORE THIS
10 CONTROVERSY. YOU HEARD TESTIMONY FROM JIM AMATO AND
11 FROM TONI SIMMS-BUSCH ABOUT THE MANY CIRCUMSTANCES IN
12 WHICH FOSTER AGENCIES DO SEND PEOPLE TO OTHER AGENCIES
13 THAT THEY THINK ARE BETTER FITS FOR THEM.

14 THE CLAIMED POLICY THAT YOU MUST DO EVERY
15 HOME STUDY IS NOT NEUTRAL AND IT'S NOT GENERALLY
16 APPLICABLE. IN FACT, IT HAS NOT BEEN APPLIED AND IT'S
17 NOT RELIGIOUSLY NEUTRAL BECAUSE IT WAS INVENTED -- IT
18 WAS INVENTED TO DEAL WITH THE SITUATION OF TWO RELIGIOUS
19 ENTITIES. THAT'S WHY IT WAS INVENTED, THAT'S WHY NO ONE
20 CAN TALK ABOUT ANY REFERENCE TO IT ANY TIME OTHER THAN
21 2018, BECAUSE IT DID NOT EXIST.

22 THE CITY WHEN IT SET OUT TO EXAMINE THE
23 PROBLEM WITH ONE EXCEPTION THERE WAS ADDED TODAY AFTER
24 THE FACT, BUT WITH ONE EXCEPTION ONLY INQUIRED OF
25 RELIGIOUS GROUPS. THEY DID NOT ASK WHETHER ANY OF THE

1 NONRELIGIOUS AGENCIES CERTIFIED SAME-SEX COUPLES AT ALL.
2 AND SO THERE IS ONE ADDITION AT THE END OF ONE GROUP
3 CALLED NET WHO HAPPENS TO BE FRIENDS WITH THE
4 COMMISSIONER. THE REST OF THE NONRELIGIOUS GROUPS HAVE
5 NEVER EVEN BEEN ASKED, RIGHT. SO THE GOVERNMENT ONLY
6 SET OUT TO ASK THE RELIGIOUS GROUPS. AND THE GOVERNMENT
7 HAS NEVER TOLD THE NONRELIGIOUS GROUPS, EITHER TELL ME
8 YOUR POLICY ON SAME-SEX COUPLES, RIGHT. IT WOULD BE
9 INTERESTING TO KNOW THAT. THE CITY ACTUALLY DOES NOT
10 EVEN KNOW IT EVEN TODAY, CAN'T BE THAT COMPELLING,
11 RIGHT. BUT ALSO, THEY HAVE NOT ASKED THEM, TELL ME
12 WHETHER YOU DO A HOME STUDY FOR EVERYBODY WHO KNOCKS ON
13 THE DOOR. THEY HAVE NOT TOLD THEM THAT THEY MUST DO
14 THAT HOME STUDY AND THEY HAVE NOT INQUIRED AS TO WHETHER
15 THEY ARE ACTUALLY DOING THAT HOME STUDY. THIS IS NOT A
16 NEUTRAL AND GENERALLY APPLICABLE LAW, THIS IS A TARGETED
17 -- A TARGETED INVESTIGATION ONLY ASKING ABOUT RELIGIOUS
18 GROUPS, NOT APPLIED TO ANY OF THE NONRELIGIOUS GROUPS.

19 YOU HEARD ALSO FROM BOTH JIM AMATO AND
20 FROM COMMISSIONER FIGUEROA ABOUT THE DIRECT RELIGIOUS
21 DISCUSSIONS THAT THE GOVERNMENT ENGAGED IN WITH
22 CATHOLIC. AGAIN, THE GOVERNMENT HAS NO DOUBT THAT
23 CATHOLIC IS A RELIGIOUS ENTERPRISE. I DON'T THINK THEY
24 HAVE ANY REAL -- THEIR LAWYER AT ONE POINT SAID FOSTER
25 CARE WAS A BUSINESS. I DON'T THINK FROM WHAT YOU HEARD

1 FROM ANY OF THE WITNESSES, INCLUDING THE CITY'S
2 WITNESSES, THAT IT'S PLAUSIBLE TO SAY THIS IS A
3 BUSINESS. CATHOLIC DOES IT AT A LOSS OF ABOUT
4 \$3.8 MILLION A YEAR.

5 BUT WHEN TALKING ABOUT WHAT CATHOLIC
6 SHOULD DO, COMMISSIONER FIGUEROA SAID TIMES HAVE
7 CHANGED, IT'S NOT 100 YEARS AGO. YOU OUGHT TO LISTEN TO
8 POPE FRANCIS. AND THERE WAS A LITTLE BIT OF A TENSION
9 BETWEEN COMMISSIONER FIGUEROA'S TESTIMONY AND JIM
10 AMATO'S. MR. AMATO TESTIFIED THAT SHE ALSO SAID YOU
11 OUGHT TO LISTEN TO POPE FRANCIS INSTEAD OF THE
12 ARCHDIOCESE OR INSTEAD OF THE ARCHBISHOP.

13 IT'S A GOVERNMENT OFFICIAL IN A
14 GOVERNMENT BUILDING TELLING A RELIGIOUS ORGANIZATION
15 WHICH RELIGIOUS LEADER TO LISTEN TO. THAT'S OUTRAGEOUS.
16 THAT'S FAIRLY UNPRECEDENTED. THE GOVERNMENT DOES NOT
17 GET TO GO TO THE RELIGIOUS GROUP AND SAY, I AM GOING TO
18 TELL YOU WHICH RELIGIOUS LEADER YOU ARE GOING TO LISTEN
19 TO. AND IF YOU DON'T DO IT MY WAY, WE ARE GOING TO TAKE
20 YOU OUT OF THE FOSTER CARE BUSINESS. BUT THAT'S
21 ESSENTIALLY WHAT THE CITY IS DOING. THEY TOLD US WHAT
22 SET OF RELIGIOUS BELIEFS WE OUGHT TO FOLLOW. THE
23 ARCHDIOCESE JUST CAN'T FOLLOW THOSE, THEY DISAGREE.
24 THEY HAVE A DISAGREEMENT ABOUT A LOT OF THINGS, BUT THE
25 GOVERNMENT SHOULD NOT BE TELLING PEOPLE WHICH RELIGIOUS

1 BELIEFS TO FOLLOW, WHICH RELIGIOUS LEADER TO FOLLOW.

2 THE GOVERNMENT CERTAINLY SHOULD NOT HAVE
3 THE OPINION THAT THERE ARE CERTAIN RELIGIOUS BELIEFS
4 THAT YOU REALLY OUGHT TO LET GO OF BY NOW, YOU REALLY
5 OUGHT TO LET GO OF THAT ONE. THE GOVERNMENT HAS NO
6 BUSINESS HAVING AN OPINION ON THAT, AND THEY CERTAINLY
7 HAVE NO BUSINESS DIRECTLY TELLING RELIGIOUS GROUPS WHAT
8 RELIGIOUS BELIEFS ARE OKAY AND WHAT ARE NOT OKAY. THAT
9 IS OUTRIGHT AND OPEN RELIGIOUS DISCRIMINATION FROM A
10 GOVERNMENT OFFICIAL IN A GOVERNMENT OFFICE. THEY ARE
11 NOT ALLOWED TO DO IT.

12 SO YOU HAVE THE INVESTIGATION THAT STARTS
13 WITH ONLY CALLING THE RELIGIOUS, THE INVESTIGATION THAT
14 CONTINUES, WITH ONE EXCEPTION, NOT CHECKING WITH ANY OF
15 THE NONRELIGIOUS EITHER ABOUT THIS OR ANY OTHER REFERRAL
16 SITUATION, AND THEN YOU HAVE THE GOVERNMENT TELLING THEM
17 THEY OUGHT TO GET OVER THEIR RELIGIOUS BELIEFS, THEY
18 OUGHT TO LISTEN TO A CERTAIN RELIGIOUS LEADER.

19 THE COURT: WELL, IT'S NOT JUST A CERTAIN
20 RELIGIOUS LEADER, IT'S THE HEAD OF THE CATHOLIC CHURCH.

21 MR. RIENZI: OH, IT SURE IS, YOUR HONOR.
22 BUT THE GOVERNMENT DOES NOT GET TO BE THE ONE WHO
23 FIGURES OUT WHAT POPE FRANCIS MEANS. BUT ARCHBISHOP
24 CHAPUT HAS A DIFFERENT VIEW OF WHAT POPE FRANCIS MEANT
25 THAN THE PHILLY INQUIRER DOES. I AM NOT COMPETENT TO

1 TELL THE ANSWER TO THAT EITHER, BUT THE GOVERNMENT SURE
2 IS NOT COMPETENT TO TELL THAT, RIGHT, SO "YOU OUGHT TO
3 LISTEN TO THE POPE" IS NOT A NEUTRAL STATEMENT, RIGHT.
4 I THINK THEY HAVE A PRETTY CLEAR VIEW OF WHAT THEY THINK
5 THE POPE MEANS. AND I DON'T THINK THE GOVERNMENT HAS
6 GOT ANY BUSINESS HAVING A VIEW ON THE SUBJECT. THE
7 GOVERNMENT HAS NO COMPETENCE AND NO AUTHORITY TO HAVE A
8 VIEW ON THAT SUBJECT, CERTAINLY NOT TO THREATEN
9 RELIGIOUS GROUPS WITH IT.

10 COMPELLED SPEECH, YOUR HONOR. UNDER --
11 AND JUST TO FINISH UP ON FREE EXERCISE. UNDER ANY OF
12 THESE THEORIES, UNDER THE RELIGIOUS DISCRIMINATION
13 THEORY, UNDER THE NOT-NEUTRAL AND GENERALLY-APPLICABLE
14 THEORY AND UNDER THE THEORY THAT THERE ARE
15 INDIVIDUALIZED GOVERNMENT EXEMPTIONS AND INDIVIDUALIZED
16 GOVERNMENT ASSESSMENTS. YOU GET TO STRICT SCRUTINY
17 UNDER THE FREE EXERCISE CLAUSE. ANY ONE OF THEM WILL
18 DO, WE HAVE GOT ALL OF THEM. AND UNDER STRICT SCRUTINY
19 AGAIN, THE GOVERNMENT CAN ONLY WIN IF IT COULD PROVE A
20 COMPELLING GOVERNMENT INTEREST AND LEAST-RESTRICTIVE
21 MEANS. IT CAN'T, IT HAS NOT -- FROM THEIR OWN MOUTHS
22 THEY ACTUALLY SAID IT IS NOT THAT COMPELLING, THEY HAVE
23 TO LOSE.

24 THERE'S ALSO A COMPELLED SPEECH CLAIM.
25 THE GOVERNMENT WANTS TO FORCE CATHOLIC TO PROVIDE THESE

1 CERTIFICATIONS. CATHOLIC DOES NOT WANT TO DO IT. THAT
2 IS A CLEAR CASE OF COMPELLED SPEECH. THE GOVERNMENT IS
3 NOT ALLOWED TO SAY TO CATHOLIC, YOU HAVE TO SAY THE
4 THINGS I WANT YOU TO SAY. BUT THAT'S WHAT THEY ARE
5 TRYING TO DO. THEY ARE SAYING, IF YOU WANT TO DO FOSTER
6 CARE FOR THESE OTHER FAMILIES, YOU ARE GOING TO HAVE TO
7 MAKE THESE CERTIFICATIONS AND YOU ARE GOING TO HAVE TO
8 EXPRESS YOUR OPINIONS ABOUT THESE FAMILIES AND THEIR
9 RELATIONSHIPS. CATHOLIC DOES NOT WANT TO. UNDER THE
10 FIRST AMENDMENT, THEY CAN'T BE REQUIRED TO.

11 YOU HEARD A LITTLE BIT OF TESTIMONY FROM
12 THE CITY CLAIMING THAT RECRUITMENTS AND SIGNING UP OF
13 FAMILIES -- I GUESS THEY SAID A COUPLE OF DIFFERENT
14 THINGS. AT TIMES THEY SAID RECRUITMENT AND SIGNING UP
15 OF FAMILIES IS PART OF THE CONTRACT. THERE IS NO
16 INDICATION THAT THEY PAY ANYTHING FOR THAT. THERE IS NO
17 INDICATION THAT THEY CHECK ANYTHING ON THAT. ELSEWHERE
18 THEY SEEM TO SAY IT'S NOT DHS'S JOB, IT'S SOMEBODY
19 ELSE'S JOB.

20 CERTAINLY CATHOLIC IS NOT ACTING AS THE
21 CITY AND CERTAINLY IT IS NOT SPENDING MONEY UNDER THE
22 CONTRACT WHEN IT JUST STEPS ASIDE. SO YOU MIGHT HAVE AN
23 ARGUMENT ABOUT MAYBE THERE IS OVERHEAD AND SOMETHING
24 ELSE, BUT WHEN CATHOLIC JUST SAYS, YOU KNOW WHAT, I
25 CAN'T DO THAT, THEY ARE NOT SPENDING THE CITY'S MONEY,

1 THEY ARE NOT OPERATING AS THE CITY, THEY ARE OPERATING
2 AS THEMSELVES AND THEY ARE STEPPING ASIDE. THEY ARE NOT
3 TAKING ACTIONS UNDER THAT CONTRACT. THEY ARE CHOOSING
4 NOT TO AND THEY ARE EXERCISING A STATUTORY AND
5 CONSTITUTIONAL RIGHT TO CHOOSE NOT TO DO THAT.

6 THE CITY DOES NOT DENY AND, IN FACT, HAS
7 BEEN CRYSTAL CLEAR THAT IT IS ATTEMPTING TO FORCE
8 CATHOLIC TO MAKE WRITTEN CERTIFICATIONS ENDORSING THE
9 RELATIONSHIPS OF COUPLES IN SAME-SEX MARRIAGE WHO APPLY
10 FOR HOME STUDIES. THAT'S THE ONLY THING CATHOLIC COULD
11 DO TO SATISFY THEM HERE. THEY HAVE TO FILL OUT THOSE
12 STATE CRITERIA, AND IF THEY DON'T, THE CITY SAYS YOU ARE
13 OUT OF LUCK AND YOU ARE OUT OF FOSTER CARE.

14 THE CITY IS RIGHT THAT WHEN THE CITY IS
15 CONTRACTING THE CITY GETS A MEASURE OF DISCRETION. BUT
16 THE CITY DOES NOT GET THE DISCRETION TO FORCE PEOPLE TO
17 ENGAGE IN COMPELLED SPEECH AND IT DOES NOT GET THE
18 DISCRETION TO FORCE PEOPLE TO VIOLATE THEIR RELIGIOUS
19 BELIEFS. HERE, THEY ARE DOING BOTH OF THEM AND THEY
20 MUST LOSE.

21 THE CITY ACTS LIKE IT WILL BE BIG DEAL,
22 AND MR. CERVONE AT TIMES ACTED LIKE IT WOULD BE A BIG
23 DEAL IF YOU MAINTAIN THE STATUS QUO. AND BY STATUS QUO,
24 I MEAN THE STATUS QUO ANTE. SO THE STATUS QUO I AM
25 REFERRING TO IS THE STATUS QUO BEFORE THEY CUT OFF

1 REFERRALS. SO UNTIL EARLY MARCH IS WHAT I MEAN BY THE
2 STATUS QUO, BECAUSE THAT'S WHAT WE ARE ASKING YOUR HONOR
3 TO PUT BACK IN PLACE, AT LEAST FOR A PERIOD OF TIME
4 WHILE WE LITIGATE THE REST OF THE CASE.

5 THE CITY ACTS LIKE IT WOULD BE A BIG DEAL
6 TO RESUME THAT STATUS QUO. THE REALITY IS THEY OPERATED
7 UNDER THAT STATUS QUO FOR A LONG TIME AND NOBODY HAD A
8 PROBLEM. THERE WAS NO PROBLEM. THERE IS NOT A SINGLE
9 SAME-SEX FOSTER PARENT APPLICANT WHO HAS NOT BEEN ABLE
10 TO BECOME A FOSTER PARENT, ZERO. AND YOU HEARD MR.
11 AMATO'S TESTIMONY THAT ACTUALLY SINGLE SAME-SEX PEOPLE
12 WHO APPLY TO THEM GET CERTIFIED, RIGHT. IT'S REALLY
13 THIS NARROW ISSUE. AS A RELIGIOUS MATTER, THE CHURCH
14 CAN'T DO THE CERTIFICATION ABOUT THE RELATIONSHIPS.
15 THAT'S IT. AND THE CITY'S SOLUTION IS YOU ARE GONE, YOU
16 ARE OUT OF THIS WORK, AND SURE IT'S BAD IF SOME KIDS GET
17 TRANSFERRED, SURE IT'S BAD IF SOME HOMES SAY EMPTY, SURE
18 IT'S BAD IF SOME KIDS STAY AT PLACES THEY SHOULDN'T BE,
19 BUT WE WILL EVENTUALLY CATCH UP AND SORT IT OUT.

20 BUT THAT'S NOT THE LAW. THE LAW IN THIS
21 COUNTRY ALLOWS FOR DIVERSITY. IT ALLOWS FOR DIVERSITY.
22 AND SO IT ALLOWS A WORLD IN WHICH YOU HAVE BOTH GAY
23 FOSTER PARENTS AND A CATHOLIC AGENCY THAT HAS DIFFERENT
24 BELIEFS ABOUT RELIGION AND SEX. AND THEY DON'T ALL HAVE
25 TO AGREE ON EVERYTHING ALL THE TIME. I THINK ONE OF THE

1 TEACHINGS OF THE MASTERPIECE CASE, WHICH JUST CAME OUT A
2 COUPLE OF WEEKS AGO, WAS PRECISELY THAT WE HAVE TO FIND
3 WAYS TO ACTUALLY LIVE TOGETHER IN THIS SOCIETY OF PEOPLE
4 WHO DON'T ALL SHARE THE SAME BELIEFS. IT'S A FREE
5 PEOPLE. SO IN A FREE PLACE WE ARE NOT ALWAYS GOING TO
6 SHARE THE SAME BELIEFS. IT CAN'T BE THE CASE THAT WE
7 GET TO A POINT WHERE THERE IS ONE ACCEPTABLE VIEW ON
8 MARRIAGE AND THEN YOU CAN'T DO ANY SOCIAL WORK IN THE
9 CITY OR YOU CAN'T DO THIS SOCIAL WORK UNLESS YOU SHARE
10 IT.

11 IN MASTERPIECE, THE MAJORITY ACTUALLY
12 TALKED ABOUT THE SITUATION OF A CHURCH REFUSING TO DO A
13 SAME-SEX WEDDING AND THEY SAID THAT WAS THE EASY CASE,
14 RIGHT. THEY SAID THE HARDER CASE, SELLERS OF COMMERCIAL
15 SERVICES, THE BUSINESS GUY SELLING THE CAKES, EVEN THAT
16 THAT GUY WON, BUT THE EASY CASE TO THEM IN THEIR OPINION
17 WAS THE CLERGY WHO SAYS, I CAN'T DO THE WEDDING. WELL,
18 CATHOLIC IS PRECISELY IN THAT SITUATION, RIGHT.
19 CATHOLIC IS LIKE THE CLERGY. THEY ARE PART OF THE
20 CATHOLIC CHURCH AND THEY ARE SIMPLY SAYING, LOOK, I
21 CAN'T DO THINGS THAT OPENLY AND DIRECTLY VIOLATE MY
22 RELIGIOUS BELIEFS. I WANT TO GO TAKE CARE OF THE KIDS
23 IN THE CITY AS I HAVE FOR DECADES, I CAN'T DO THIS THING
24 THAT VIOLATES MY RELIGIOUS BELIEF. WHAT MASTERPIECE
25 SAID ABOUT THAT IS THAT THAT'S OKAY BECAUSE PEOPLE CAN

1 ACCEPT THAT THAT IS A RELIGIOUS EXERCISE AND BECAUSE
2 IT'S NOT STANDING IN THE WAY OF PEOPLE GETTING -- IT'S
3 NOT HARMING DIGNITY OR STANDING IN THE WAY OF PEOPLE
4 GETTING SERVICES, BECAUSE THEY CAN GET SERVICES
5 ELSEWHERE.

6 THE SAME IS TRY HERE. MARRIAGES, LIKE
7 FOSTER CARE, HAVE SOME RELATIONSHIP TO THE GOVERNMENT,
8 RIGHT. YOU NEED A LICENSE FROM THE GOVERNMENT TO GET
9 MARRIED. SO IT'S NOT THAT IT'S UTTERLY UNCONNECTED TO
10 THE GOVERNMENT. BUT WHAT IT IS IS THAT PEOPLE CAN
11 UNDERSTAND NOT EVERY CHURCH HAS TO HAVE THE SAME VIEWS
12 ABOUT SEX AND MORALITY. IT'S KIND OF RIDICULOUS TO
13 THINK THAT EVERY CHURCH IS GOING TO HAVE IDENTICAL VIEWS
14 ON THOSE THINGS, AND THE GOVERNMENT SHOULD NOT BE IN THE
15 POSITION OF TRYING TO CRUSH ONE, TRYING TO KICK IT OUT
16 OF THE PUBLIC SPHERE BECAUSE IT HAS THE WRONG VIEWS.
17 TEACHINGS OF OBERGEFELL AND MASTERPIECE ACTUALLY BOTH
18 POINT IN THE DIRECTION OF SAYING, WE ARE ALLOWED TO HAVE
19 DISAGREEMENT AND WE HAVE GOT TO FIND WAYS TO WORK
20 TOGETHER. AND HERE THE LOGICAL WAY TO WORK TOGETHER IS
21 TO LET CATHOLIC KEEP TAKING CARE OF KIDS, BUT NOT KICK
22 THEM OUT OF THE SPHERE JUST BECAUSE THEY HAVE A
23 DIFFERENT SET OF RELIGIOUS BELIEFS. THE CITY MAY WISH
24 THAT THEY WOULD MOVE ON FROM THOSE BELIEFS. MR. CERVONE
25 MAY WISH THAT THEY WOULD MOVE ON FROM THOSE BELIEFS, BUT

1 THEY ARE ENTITLED TO HAVE THEM. STATE AND FEDERAL LAW
2 LET THEM HAVE THEM.

3 WITH THAT, YOUR HONOR, WE SUGGEST THAT --
4 WE VERY MUCH ASK THIS COURT TO PROVIDE A TEMPORARY
5 RESTRAINING ORDER OR PRELIMINARY INJUNCTION AND DO TO SO
6 AS QUICKLY AS POSSIBLE. AND IF I COULD THEN RESERVE THE
7 REST OF MY ARGUMENTS FOR REBUTTAL AFTERWARD. THANK YOU.

8 THE COURT: OKAY. I WILL HEAR FROM THE
9 CITY.

10 MS. EWING: MAY IT PLEASE THE COURT,
11 CATHOLIC SOCIAL SERVICES ASKED FOR THIS HEARING FOR THE
12 EXTRAORDINARY RELIEF OF A TEMPORARY RESTRAINING ORDER ON
13 THE BASIS THAT IT WOULD SUFFER IMMEDIATE AND IRREPARABLE
14 HARM UNLESS THE CITY WILL BE ORDERED TO OPERATE UNDER AN
15 EXPIRED CONTRACT OR SOON-EXPIRED CONTRACT OR TO ENTER
16 INTO A NEW FULL CONTRACT WITH CSS IMMEDIATELY. THERE
17 HAVE BEEN MULTIPLE DAYS OF TESTIMONY WHICH HAVE
18 DEMONSTRATED THAT THERE IS NO NEED FOR SUCH
19 EXTRAORDINARY RELIEF IN THIS CASE. NONE OF THE HARMS
20 THAT CATHOLIC SOCIAL SERVICES FOCUSED ON, WHETHER ITS
21 OWN LOSS OF BUSINESS, OR ITS FOSTER PARENTS' INTEREST,
22 OR ITS FAILED ATTEMPT TO SUGGEST THAT THE CITY IS NOT
23 ACTING IN THE BEST INTEREST OF CHILDREN, SATISFIES THE
24 INJUNCTION STANDARD. NOR IS CSS LIKELY TO SUCCEED ON
25 THE MERITS, AND BOTH THE CITY AND THE PUBLIC INTEREST

1 WILL SUFFER IF THIS COURT WERE TO ISSUE AN INJUNCTION.

2 I AM GOING TO FOCUS ON THE KEY EVIDENCE
3 FROM THIS WEEK'S HEARING AND A FEW ISSUES WHICH WERE
4 DIRECTLY RAISED BY CATHOLIC. SINCE THIS WAS AN
5 EVIDENTIARY HEARING AND IN THE INTEREST OF BREVITY, THE
6 CITY RELIES ON OUR BRIEFING FOR ANY MERITS ARGUMENTS
7 THAT I DO NOT DISCUSS AGAIN TODAY.

8 FIRST, I WANT TO TALK ABOUT HARM A LITTLE
9 BIT. CATHOLIC HAS PRESENTED NO EVIDENCE OF URGENT OR
10 ACTUAL IRREPARABLE HARM THAT WOULD MERIT AN INJUNCTION.
11 ALL OF THEIR ATTEMPTS TO SHOW HARM HAVE EITHER FAILED OR
12 THEY ARE IRRELEVANT TO A TRO, PRELIMINARY INJUNCTION
13 ANALYSIS. FIRST, CATHOLIC SOCIAL SERVICES ARGUED THAT
14 THEY WON'T BE ABLE TO PROVIDE FOSTER CARE AS PART OF ITS
15 RELIGIOUS MISSION WITHOUT A CONTRACT WHICH ALLOWS NEW
16 PLACEMENTS. BUT THEIR OWN TESTIMONY ABOUT THEIR OTHER
17 FOSTER CARE ACTIVITIES, SUCH AS CONGREGATE CARE, THEIR
18 CONTRACTS WITH OTHER COUNTIES TO PROVIDE FOSTER CARE,
19 AND INDEED THEIR OTHER CONTRACTS WITH THE CITY ALL SHOW
20 THAT CATHOLIC SOCIAL SERVICES WILL BE ABLE TO EXERCISE
21 ITS CHARITABLE MISSIONS TO BE TAKING CARE OF CHILDREN,
22 AND REBUT THEIR CLAIM. AND THEIR HARMS TO -- THAT ARE
23 IN THE NATURE OF BUSINESS LOSSES, SUCH AS WHETHER THEY
24 WILL LOSE CONTRACTS SO THAT THEY MAY HAVE TO DOWNSIZE,
25 THESE TYPES OF HARMS ARE NOT CONSIDERED IRREPARABLE IN

1 THIS CIRCUIT. AND IT IS NOT CRITICAL. ONE OF THE SORT
2 OF THINGS THAT WE HAVE -- THERE HAS BEEN A LOT OF
3 DISCUSSION WHETHER THEY ARE A BUSINESS, WHETHER THEY ARE
4 NOT A BUSINESS. THEY ARE A NONPROFIT COOPERATION WITH
5 EMPLOYEES AND THEY ENGAGE IN -- AND THEY ENTER INTO
6 CONTRACTS TO PERFORM SERVICES AND ARE CLAIMING BUSINESS
7 HARMS.

8 SECOND, THEY TRIED TO PORTRAY A FOSTER
9 CARE CRISIS, ALTHOUGH IT IS UNCLEAR HOW CATHOLIC ITSELF
10 IS HARMED BY THAT ALLEGATION IN A WAY THAT WOULD WARRANT
11 A TRO. BUT EVEN THEIR CLAIM THERE THAT THIS IS SOME
12 KIND OF OVERALL URGENT FOSTER CARE CRISIS WAS BELIED BY
13 THE TESTIMONY OF -- CERTAINLY BY THE DHS WITNESSES.
14 SIMILARLY, THERE IS NO EVIDENCE OF ANY CRISIS THAT HAS
15 RESULTED FROM DHS HALTING THE INTAKE TO CATHOLIC SOCIAL
16 SERVICES. THEIR EVIDENCE IS THAT THERE ARE SOME OPEN
17 CATHOLIC FOSTER HOMES.

18 THEY HAVE ALSO TRIED TO ARGUE THAT THE
19 WAY THAT THE DEPARTMENT OF HUMAN SERVICES HAS HANDLED
20 EXCEPTIONS TO INTAKE FOLLOWING THE INTAKE CLOSURE HAS
21 SOMEHOW HARMED OR THREATENED TO HARM CHILDREN. AGAIN,
22 THE EVIDENCE THAT HAS BEEN PRESENTED IS THAT DHS IS
23 LOOKING AT THIS ISSUE FROM THE PRISM OF THE BEST
24 INTEREST OF THE CHILDREN, THAT THEY HAVE DETERMINED THAT
25 ALL CURRENT KIDS CAN REMAIN WITH THEIR FAMILIES UNTIL

1 THEY LEAVE THE SYSTEM, THAT IF NECESSARY THAT FOSTER
2 FAMILIES WILL BE ABLE TO WORK WITH OTHER AGENCIES AS HAS
3 BEEN DONE IN THE PAST WITH MANY OTHER CLOSURES OR LOSSES
4 OF CONTRACTS FOR FOSTER CARE. AND THE TESTIMONY FROM
5 THE THREE FOSTER PARENTS DID NOT RULE THIS OUT. NOT
6 SURPRISINGLY, BECAUSE YOU WOULD EXPECT THAT THEY WOULD
7 WANT TO STAY IF THEY HAVE A BOND WITH THE CHILD, THAT
8 THAT WOULD BE THE DETERMINATIVE FACTOR. BUT THE
9 EVIDENCE IS ALSO THAT DH LEADERSHIP HAS AND WILL ALLOW
10 INTAKE EXCEPTIONS FOR BEST INTEREST REASONS. AND THESE
11 ARE REASONS SUCH AS SIBLINGS COMING INTO CARE AND GOING
12 TO THE FOSTER FAMILY THAT IS LOOKING AFTER OTHER
13 SIBLINGS IN THE FAMILY. OR IF THERE IS A FORMER FOSTER
14 PARENT INVOLVED WHERE THAT WOULD BE A GOOD FIT TO GO
15 BACK. BUT THERE HAS BEEN NO EVIDENCE THAT WHERE -- IN
16 ANY INSTANCE IN WHICH DHS LEADERSHIP HAS BEEN ASKED FOR
17 AN EXEMPTION OR IT HAS BEEN BROUGHT TO THEIR ATTENTION
18 THAT THERE IS ONE OF THESE CASES THAT ANY PERMISSION HAS
19 BEEN DENIED. IT HAS ALWAYS BEEN GRANTED.

20 SO FINALLY, WE HAVE THE TESTIMONY OF MR.
21 AMATO WHO APPEARED TO TESTIFY THAT DHS, YOU KNOW, WOULD
22 NEGOTIATE AN INTERIM TRANSITIONAL CONTACT WITH THE CITY
23 TO -- RATHER THAN WALK AWAY FROM -- ON JUNE 30TH WITH NO
24 CONTRACT AND CLOSE ITS FOSTER HOMES. THE CITY HAS
25 OFFERED AN INTERIM AGREEMENT TO CSS WHICH WILL EVEN KEEP

1 COMPENSATION RATES THE SAME AS IN THE CURRENT CONTRACT
2 AND WILL LAST -- WE HAVE OFFERED THEM A ONE-YEAR
3 CONTRACT IN ORDER TO ALLOW THE RELATIONSHIP TO WIND DOWN
4 WITH -- YOU KNOW, IN AN ORDERLY FASHION. THAT IN ITSELF
5 REMOVES ANY URGENCY WHICH COULD WARRANT ANY
6 EXTRAORDINARY RELIEF FROM THIS COURT.

7 NOW, I WOULD LIKE TO TALK A LITTLE BIT
8 ABOUT THE MERITS, ANOTHER PRONG OF THE TRO, PRELIMINARY
9 INJUNCTION ANALYSIS. THERE HAVE BEEN MANY ARGUMENTS
10 MADE IN THIS CASE WHICH THE CITY REGARDS AS EITHER
11 DWELLING ON IRRELEVANT POINTS OR TO THE EXTENT THEY ARE
12 IRRELEVANT, OFFERING INADEQUATE EVIDENCE TO SUSTAIN
13 THEM. I WANT TO GO THROUGH A FEW OF THOSE. FOR
14 EXAMPLE, WHETHER OR NOT CATHOLIC SOCIAL SERVICES IS
15 PERFORMING ITS FOSTER CARE WORK AS A RELIGIOUS MISSION
16 IS NOT THE POINT. THIS IS NOT A CASE IN WHICH THE CITY
17 IS COMING IN TO INTERFERE WITH PRIVATE CHARITABLE WORK.
18 THE FACT THAT -- IT'S THE OPPOSITE, IT'S -- CATHOLIC
19 SOCIAL SERVICES HAS ACCEPTED A CONTRACT FROM THE CITY OF
20 PHILADELPHIA TO PERFORM WORK WHICH THE CITY OF
21 PHILADELPHIA IS CHARGED WITH BY THE COMMONWEALTH TO TAKE
22 CARE OF ABUSED AND NEGLECTED CHILDREN BY PROVIDING THEM
23 WITH FOSTER CARE. AND WE HAVE DELEGATED THROUGH
24 CONTRACTS PART OF THAT OBLIGATION, PART OF THE PROVIDING
25 OF FOSTER CARE TO THE 28 OR 29 OR 30 FOSTER CARE

1 AGENCIES WHICH HAVE ENTERED INTO CONTRACTS WITH THE
2 CITY. YOU DON'T HAVE TO SIGN A CONTRACT. YOU CAN
3 NEGOTIATE THE CONTRACT, YOU CAN WALK AWAY. IF A
4 PROVISION IS A DEAL BREAKER FOR ONE SIDE OR THE OTHER,
5 YOU HAVE TO WALK AWAY, ONE SIDE OR THE OTHER.

6 SO THE FIRST POINT IS THAT YOU ARE NOT
7 SUBSTANTIALLY BURDENED IF YOU AGREE TO A PROVISION IN A
8 CONTRACT. YOU CAN'T THEN UNILATERALLY CHANGE THAT
9 OBLIGATION AFTER THE CONTRACT HAS BEEN IN EFFECT AND SAY
10 IT DOES NOT APPLY TO ME BECAUSE I HAVE THIS EXCEPTION OR
11 FOR RELIGIOUS REASONS. THAT'S SOMETHING THAT NEEDS TO
12 BE WORKED OUT UP FRONT. THESE CONTRACTS ARE TO PROVIDE
13 PUBLIC SOCIAL SERVICES. THEY ARE PAID FOR WITH TAXPAYER
14 DOLLARS AND OBVIOUSLY YOU HAVE SEEN, IT'S AN EXHIBIT, IT
15 HAS MANY TERMS. BUT ONE OF THE -- CERTAINLY THE CITY
16 DISAGREES WITH CATHOLIC SOCIAL SERVICES AS TO WHETHER
17 THE CONTRACT REQUIRES THEM TO RECRUIT AND CERTIFY FOSTER
18 PARENTS. I THINK IF YOU READ THE CONTRACT AND AS WE
19 HAVE EXPLAINED IN OUR BRIEFS, IT IS PART OF THEIR SCOPE
20 OF SERVICES. AND WE BELIEVE IT IS PART OF THEIR SCOPE
21 OF SERVICES AND PART OF THE OVERALL COMPENSATION
22 STRUCTURE. THE COMMONWEALTH OF PENNSYLVANIA SETS THE
23 CRITERIA FOR EVALUATING PROSPECTIVE FOSTER FAMILIES, AND
24 NONE OF THESE CRITERIA ARE RELIGIOUS IN NATURE.

25 ANOTHER PROVISION OF OUR CONTRACT IS THAT

1 -- AND IT'S CLEARLY SET FORTH IN THE CONTRACT, IS THAT
2 ALL FAMILIES MUST BE TREATED EQUALLY UNDER THE -- AND
3 WITH NO DISCRIMINATION. I HAVE HEARD ALL KINDS OF
4 EFFORTS TO MINIMIZE THE REFERENCES TO THE FAIR PRACTICES
5 ORDINANCE IN THE CONTRACT AND I WILL GET TO THAT IN A
6 SECOND, BUT THE NONDISCRIMINATION PROVISIONS IN THE
7 CONTRACT ARE PUT THERE FOR A REASON. IT IS NOT
8 SOMETHING THAT -- YOU KNOW, I HAVE HEARD A LOT OF
9 ARGUMENT OF WELL, NO ONE HAS EVER TRIED TO APPLY THIS,
10 HERE IS -- WE HAVE NOT CALLED EVERY ONE OF OUR
11 CONTRACTORS TO ASK WHETHER THEY ARE COMPLYING WITH IT.
12 IT'S A PROVISION OF THE CONTRACT. WE HAVE A RIGHT TO
13 EXPECT THAT WHEN OUR CONTRACTOR SIGN A CONTRACT THAT
14 THEY ARE DOING WHAT THEY SAY THEY ARE GOING TO DO AND
15 HAVE OBLIGED THEMSELVES TO DO UNLESS WE FIND OUT TO THE
16 CONTRARY. AND IN THIS CASE, IT WAS ONLY WHEN THE
17 INQUIRER ARTICLE CAME OUT AND IN THE AFTERMATH OF THE
18 INQUIRER ARTICLE THROUGH INQUIRIES, CATHOLIC SOCIAL
19 SERVICES CLEARLY STATED THAT IT WOULD NOT BE ABLE TO
20 COMPLY WITH THAT PROVISION THAT WAS IN THE CONTRACT.

21 AND SO AT THAT POINT, YOU KNOW, WE
22 REACHED THE DECISION THAT THE CONTRACT IS COMING TO AN
23 END, AND IT LOOKS AS IF THEY ARE NOT GOING TO BE ABLE TO
24 ENTER INTO A NEW ONE AND MAKE THE DECISION TO SIGN WHEN
25 WE BOTH KNOW THAT THIS IS VERY IMPORTANT AND A DEAL

1 BREAKER TO THE CITY.

2 I WANT TO GO TO THE PUBLIC ACCOMMODATION
3 ARGUMENT WHICH I'VE HEARD A LOT ABOUT, AND I THINK THIS
4 IS MOSTLY ANOTHER RED HERRING AND I WILL EXPLAIN WHY.
5 WE DON'T HAVE TO PARSE THE FAIR PRACTICES ORDINANCE AND
6 ALL OF ITS APPLICATIONS. ALTHOUGH WE DO TAKE THE
7 POSITION THAT RECRUITING AND SELECTING AND SUPPORTING
8 FOSTER PARENTS IS A SERVICE, AND A SERVICE IS INCLUDED
9 IN THE FAIR PRACTICES ORDINANCE. AND THERE IS NO
10 EXCEPTION IN THE FAIR PRACTICES ORDINANCE FOR PRIVATE
11 BUSINESSES, SO WE THINK THAT IT DOES APPLY. BUT THE NEW
12 CONTRACTS THAT WILL BE -- THAT HAVE BEEN EXTENDED TO --
13 THE FULL CONTRACTS TO THE AGENCIES WITH WHICH WE ARE
14 WORKING ON FULL RENEWALS, AND THE FULL CONTRACT
15 CONSISTENTLY THAT WE WOULD BE OFFERING TO CATHOLIC
16 SOCIAL SERVICES, AS THERE WAS TESTIMONY, CLARIFY THAT
17 THE CONTRACT OBLIGATION IS NOT TO DISCRIMINATE AGAINST
18 ANY OF THE PROTECTED CATEGORIES UNDER THE FAIR PRACTICES
19 ORDINANCE FOR THE LENGTH OF THE NEW CONTRACT. AND SO
20 WHETHER OR NOT, YOU KNOW, JUST STANDING ALONE EVERY
21 DEFINITION OF THE FAIR PRACTICES ORDINANCE IS MET, WHICH
22 WE THINK IT IS, BUT WE HAVE MADE IT CLEAR THAT IN THE
23 UPCOMING CONTRACT AND IN THE CONTRACT GOING FORWARD THAT
24 THERE CAN BE NO DISCRIMINATION ON THE BASIS OF SEXUAL
25 ORIENTATION.

1 AND I HAVE ALSO HEARD A LOT ABOUT, YOU
2 KNOW, FOSTER CARE BEING -- YOU KNOW, WHETHER FOSTER CARE
3 IS A SERVICE OR NOT, I GUESS. THE PARTS THAT ARE OF
4 CONCERN TO US ARE REFUSALS TO DEAL AND REFUSALS TO
5 CERTIFY IN A NONDISCRIMINATORY WAY. THESE ARE THE
6 CLASSIC PIECES OF AN ANTIDISCRIMINATION LAW. AND SO THE
7 DHS WITNESSES TESTIFIED VERY CLEARLY AND EXTENSIVELY
8 THAT IT IS THE CHOICE OF THE FOSTER PARENT TO BE -- TO
9 CHOOSE THE FOSTER SERVICE PROVIDER. THEY CAN RECEIVE
10 INFORMATION, BUT IT IS THEIR ULTIMATE CHOICE. AND THE
11 DISCRIMINATION PROBLEM COMES INTO PLAY WHEN THE FOSTER
12 CARE AGENCY REFUSES TO DEAL WITH THEM. THAT IS THE SAME
13 TYPE -- IN CONCEPT, THE SAME TYPE OF DISCRIMINATION OF
14 REFUSING TO SELL SOMEBODY SOMETHING, REFUSING TO PROVIDE
15 A SERVICE FOR THEM, ANOTHER KIND OF SERVICE. YOU ARE
16 SAYING, YOU NEEDN'T APPLY HERE, WE ARE NOT HERE FOR YOU.
17 WE THINK THAT IS CLEARLY COVERED BY OUR
18 ANTIDISCRIMINATION LAW AND POLICY. AGAIN, TO CERTIFY IS
19 TO FOLLOW THE STATE CERTIFICATION REQUIREMENTS AND TO --
20 WHICH ARE DIRECTED AT WHETHER OR NOT A FAMILY IS GOING
21 TO BE ABLE TO BE A NURTURING CARETAKER AND TO RENDER A
22 DECISION ON THAT BASIS.

23 I ALSO HEARD A LOT OF CROSS EXAMINATION
24 THAT SEEM TO BE ATTEMPTING TO ESTABLISH SECULAR
25 EXEMPTIONS. I WOULD JUST LIKE TO SAY THAT THE ONLY

1 RELEVANT QUESTION UNDER THE EXEMPTION CASES IS WHETHER
2 DHS RECOGNIZED SECULAR EXEMPTIONS THAT UNDERMINE THE
3 SAME PURPOSES TO THE SAME DEGREE AS THE RELIGIOUS
4 EXEMPTION THAT CATHOLIC SEEKS. AND THE ANSWER IS THAT
5 THE ONES THAT CATHOLIC TRIED TO ESTABLISH ON CROSS DEALT
6 WITH THINGS LIKE PROXIMITY OR LANGUAGE OR SPECIAL
7 MEDICAL NEEDS. ACTUALLY, AS I SAID, DEPUTY COMMISSIONER
8 ALI REJECTED ALL OF THESE AS BEING EVEN EXEMPTIONS AT
9 ALL BECAUSE SHE SAID IT HAS TO BE THE APPLICANTS WHO
10 CHOOSE. BUT ALL OF THOSE RELATE TO LOOKING OUT FOR THE
11 BEST INTEREST OF CHILDREN. NONE OF THOSE REASONS
12 UNDERMINE OUR ANTIDISCRIMINATION LAWS OR POLICIES. AND
13 THUS CASES SUCH AS BLACKHAWK AND LIGHTHOUSE, WHICH WE
14 ARE ASSUMING THEY ARE TRYING TO MAKE AN EXEMPTION
15 ARGUMENT UNDER, DON'T APPLY.

16 BUT THE BIGGEST FAILURE ON THE MERITS
17 THAT REALLY NEEDS TO BE DISCUSSED IS WE MAINTAIN THAT
18 THE CITY -- THAT CSS WAS UNABLE TO DEMONSTRATE THE
19 SUBSTANTIAL BURDEN ON RELIGIOUS PRACTICE WHICH THEY
20 CLAIM OUR CONTRACT IMPOSES. JIM AMATO DID TESTIFY THAT
21 SAME-SEX MARRIAGE IS AGAINST CATHOLIC DOCTRINE. BUT
22 THAT TESTIMONY DOES NOT IN ITSELF ARTICULATE A CONFLICT
23 BETWEEN THAT RELIGIOUS BELIEF AND THE CONTRACT
24 OBLIGATION THAT WE BELIEVED THAT CATHOLIC WAS PERFORMING
25 NOT TO DISCRIMINATE AND TO EVALUATE ALL APPLICANTS

1 EQUALLY. BECAUSE THE CONTRACT DOES NOT REQUIRE CATHOLIC
2 OR THE CATHOLIC CHURCH TO RECOGNIZE ANY MARRIAGE IN
3 ORDER TO CERTIFY FOSTER PARENTS. SO THE MERE FACT OF --
4 THAT SAME-SEX MARRIAGE IS AGAINST CATHOLIC DOCTRINE DOES
5 NOT MEAN THAT CSS CAN'T DO ITS JOB OF EVALUATING
6 APPLICANTS FAIRLY UNDER THE STATE CRITERIA. THE COURT
7 DOES NOT HAVE TO BLINDLY ACCEPT THAT THERE IS A
8 CONFLICT. IT IS ENTITLED TO EXAMINE THE CONTRACT AND TO
9 SEE IF THERE ACTUALLY IS A CONFLICT THAT WOULD REQUIRE
10 CSS TO REQUIRE -- TO RECOGNIZE SAME-SEX MARRIAGES. WE
11 SUBMIT YOU WON'T FIND THAT.

12 MR. AMATO ALSO TESTIFIED THAT CERTIFYING
13 A SAME-SEX COUPLE'S HOME WOULD SOMEHOW BE WHAT HE CALLED
14 I BELIEVE A VALIDATION OF THE COUPLE'S RELATIONSHIP.
15 AGAIN, WE MAINTAIN THAT THE CONTRACT AND THE STATE
16 REQUIREMENTS DON'T REQUIRE CSS TO VALIDATE OR AFFIRM ANY
17 RELATIONSHIP. THE CRITERIA ARE DIRECTED TOWARD
18 ASSESSING THE APPLICANT'S ABILITY TO NURTURE A CHILD.
19 SO, FOR EXAMPLE, IF YOU HAVE A COUPLE AND THE
20 RELATIONSHIP IS THAT THEY ARE AT EACH OTHER'S THROATS
21 CONSTANTLY DURING THE HOME STUDY, YOU MIGHT SAY THIS IS
22 NOT A RELATIONSHIP THAT BODES WELL FOR THEM BEING A
23 CARETAKER OF A CHILD. BUT WHETHER THEY ARE MARRIED OR
24 IN A SINGLE SEX RELATIONSHIP DOES NOT HAVE TO BE
25 VALIDATED OR AFFIRMED.

1 AND AS A MATTER OF LAW, I DIRECT THE
2 COURT TO CASES SUCH AS THE HARRIS FUNERAL HOME CASE IN
3 THE 6TH CIRCUIT WHICH EXPRESSLY HELD THAT SIMPLY
4 COMPLYING WITH AN ANTIDISCRIMINATION STATUTE DOES NOT AS
5 A MATTER OF LAW REQUIRE -- IS NOT THE SAME THING AS A
6 VALIDATION OR ENDORSEMENT. THAT CASE, BY THE WAY, ALSO
7 SPEAKS TO ANOTHER OF MR. RIENZI'S POINTS WHICH IS
8 WHETHER OR NOT WE ARE DEALING WITH A COMPELLING STATE
9 INTEREST AND A NARROWLY-TAILORED MEANS OF ADDRESSING IT.
10 OUR POSITION IS THAT WE NEVER GET TO THAT BECAUSE THE
11 SUBSTANTIAL BURDEN IS NOT ESTABLISHED. BUT IF FOR ANY
12 REASON WE EVER GET TO THE STRICT SCRUTINY ANALYSIS,
13 THERE ARE MANY CASES. THE HARRIS FUNERAL HOME IS ONE.
14 IN ANOTHER CONTEXT WE HAVE THE SUPREME COURT'S DECISION
15 IN THE ROBERTS VERSUS THE JAYCEES. THEY ALL RECOGNIZE
16 THAT ANTIDISCRIMINATION STATUTES DO FURTHER A COMPELLING
17 GOVERNMENTAL INTEREST, AN EXTREMELY IMPORTANT COMPELLING
18 GOVERNMENTAL INTEREST. AND I AM NOT SURE WHICH ONE OF
19 THOSE CASES USES THIS LANGUAGE. THEY BOTH AGREE THAT
20 ENFORCEMENT OF AN ANTIDISCRIMINATION STATUTE IS THE
21 LEAST RESTRICTIVE MEANS OF FURTHERING THE INTEREST. ONE
22 OF THE CASES SAYS THAT IT'S THE PRECISE WAY TO FURTHER
23 THE GOVERNMENTAL INTEREST.

24 GOING BACK TO THE SUBSTANTIAL BURDEN FOR
25 A SECOND, MR. AMATO ALSO STATED THAT CATHOLIC TEACHING

1 WAS -- THAT WHAT HE CALLED THE LIFESTYLE REPRESENTED BY
2 A SAME-SEX COUPLE WAS UNACCEPTABLE IN PARENTING,
3 PRESUMABLY MEANING CATHOLIC WOULD CONSIDER ALL SAME-SEX
4 COUPLES TO BE UNFIT TO FOSTER PARENT. BUT THEY OFFERED
5 NO EVIDENCE THAT A GAY MARRIED COUPLE COULD NOT BE
6 EXCELLENT NURTURING CARETAKER. THAT'S WHY NOTHING LIKE
7 THAT IS IN THE STATE CRITERIA AND THAT IS WHAT EMPIRICAL
8 RESEARCH SHOWS IS THE CASE. THE DEPARTMENT OF HUMAN
9 SERVICES IS ENTITLED TO RELY UPON SUCH RESEARCH WHEN IT
10 SETS ITS CONTRACTUAL REQUIREMENTS FOR HOW IT WANTS THIS
11 PART OF THE JOB DONE, AND THE CITY IS ENTITLED TO OUTLAW
12 DISCRIMINATORY CONDUCT WHICH IS ROOTED IN DISAPPROVAL OF
13 THE LIFESTYLE OF A PROTECTED GROUP.

14 SO WHILE CSS DID NOT ESTABLISH A
15 SUBSTANTIAL BURDEN, MR. AMATO'S TESTIMONY DID CLEARLY
16 SHOW THAT CATHOLIC WAS INSERTING PURELY RELIGIOUS
17 CRITERIA INTO THE SECULAR CRITERIA ESTABLISHED BY THE
18 STATE. HE TESTIFIED THAT CATHOLIC WOULD CERTIFY NEITHER
19 SAME-SEX COUPLES NOR UNMARRIED HETEROSEXUAL COUPLES ON
20 RELIGIOUS GROUNDS. BUT THEN, WHICH WAS -- AND I THINK
21 YOU HEARD TESTIMONY FROM THE COMMISSIONER TODAY, NEW TO
22 DHS AND THE CITY ON TUESDAY AFTERNOON HE DESCRIBED YET
23 ANOTHER RELIGIOUS REQUIREMENT THAT CSS HAD INTERPOSED
24 INTO THE CERTIFICATION PROCESS, THAT CATHOLIC WOULD NOT
25 CERTIFY A FOSTER FAMILY UNLESS THE APPLICANTS COULD

1 PRODUCE A, QUOTE, PASTORAL LETTER, UNQUOTE, FROM A
2 CLERGY MEMBER THAT ATTESTED THAT THE APPLICANTS ACTIVELY
3 PARTICIPATED IN RELIGIOUS SERVICES. THIS FURTHER
4 COMPLICATES CATHOLIC'S ABILITY TO COMPLY WITH THE CITY'S
5 CONTRACT IN THAT, I THINK ARTICLE 15, THAT SAME SECTION
6 THAT DEALS WITH THE FAIR PRACTICES ORDINANCE, THERE IS
7 ACTUALLY AN EARLIER SENTENCE THAT COMPLETELY MAKES IT
8 CLEAR THAT THERE CAN BE NO DISCRIMINATION ON THE BASIS
9 OF RELIGION. BUT WE NOW HAVE A NEW PROBLEM IN ADDITION
10 TO THE PROBLEM WHICH BROUGHT US HERE WHICH COMPLICATES
11 THE ABILITY OF CATHOLIC SOCIAL SERVICES TO COMPLY WITH
12 THE CITY'S CONTRACT. NEITHER THE CITY NOR ITS
13 CONTRACTORS CAN IMPOSE A RELIGIOUS TEST OR DISCRIMINATE
14 ON THE BASIS OF RELIGION AND DENY CERTIFICATION SOLELY
15 BECAUSE AN APPLICANT CAN'T PRODUCE A LETTER ATTESTING
16 THAT HE OR SHE IS A BELIEVER VERSUS A NONBELIEVER, OR IT
17 SEEMED FROM THE TESTIMONY THEY COULD BE A BELIEVER BUT
18 NOT AN ACTIVE CHURCH-GOER AND WOULD BE UNABLE TO GET
19 THAT LETTER. THIS RAISES NEW CONSTITUTIONAL PROBLEMS
20 FOR THE CITY AND FOR -- POTENTIALLY FOR CSS.

21 AND LASTLY I HEARD MR. RIENZI -- HE MADE
22 AN ARGUMENT THAT BY -- THAT WE WERE COMPELLING SPEECH
23 AND THEREBY VIOLATING FIRST AMENDMENT SPEECH RIGHTS OF
24 CATHOLIC SOCIAL SERVICES IN ADDITION TO THE RELIGIOUS
25 FREE EXERCISE AND RFRA CLAIMS. BUT THE KEY POINT WITH

1 REGARD TO COMPELLED SPEECH CASES IS THAT THE GOVERNMENT
2 CAN'T RESTRICT SPEECH THAT IS OUTSIDE OF THE PROGRAM
3 THAT HAS BEEN ENTERED INTO. WHEN THE RESTRICTION
4 APPLIES TO THE PROGRAM ACTIVITIES THEMSELVES, WHICH THE
5 PARTY HAS ENTERED INTO VOLUNTARILY, LIKE A CONTRACT,
6 THAT SPEECH CAN BE REGULATED. WE THINK IT IS CLEAR HERE
7 THAT THE CERTIFICATION PROCESS, THE RECRUITMENT PROCESS
8 IS SQUARELY WITHIN THE CONTRACT BETWEEN THE CITY AND
9 CATHOLIC, AND THAT THEREFORE THE COMPELLED SPEECH LINE
10 OF CASES HAS NO APPLICABILITY.

11 FINALLY, I WANT TO TALK ABOUT THE
12 REMAINING ISSUES WITH RESPECT TO THE ISSUANCE OF AN
13 INJUNCTION, AND ALL OF THOSE MILITATE AGAINST ITS
14 ISSUANCE WITH REGARD TO PUBLIC FACTORS AND THE -- WHAT
15 THE EFFECT OF AN INJUNCTION WOULD BE. DHS IS OBLIGATED
16 TO ACT IN THE BEST INTEREST OF 6,000 OR MORE CHILDREN,
17 6,000 IN FOSTER CARE AND 10,000 TOTAL FOR WHOM IT HAS
18 CUSTODIAL RESPONSIBILITY. AND AS THE COMMISSIONER AND
19 DEPUTY COMMISSIONER ALI TESTIFIED, THAT REQUIRES THEM --
20 THEY HAVE MADE THE DECISION THAT THEY NEED TO KEEP
21 INTAKE CLOSED UNLESS OR UNTIL CATHOLIC SOCIAL SERVICES
22 CAN SIGN A FULL CONTRACT, THAT IT CANNOT PERMIT FOSTER
23 CARE AGENCY CONTRACTORS TO DISCRIMINATE IN WAYS THAT
24 WILL DEPRESS BADLY-NEEDED DIVERSITY OF FOSTER CARE
25 FAMILIES AND DHS'S RESULTING ABILITY TO DETERMINE THE

1 BEST FIT FOR EACH CHILD WHO COMES INTO PLACEMENT. AS
2 THE TESTIMONY -- AS I HEARD THE TESTIMONY, I THINK THE
3 COMMISSIONER TESTIFIED CHILDREN ARE NOT WIDGETS. YOU
4 DON'T JUST ONE COMES IN AND YOU SAY, OH, THERE'S AN OPEN
5 HOME, THEY GO IN. THEY HAVE PARTICULAR NEEDS AND THERE
6 IS A PARTICULAR NEED WITHIN THE CITY AND IN DHS TO HAVE
7 AS MANY DIFFERENT KINDS OF FOSTER CARE FAMILIES AND TO
8 MAKE THEM FEEL WELCOME SO THAT THE BEST FIT FOR THE
9 CHILDREN CAN BE MADE.

10 DHS CANNOT PERMIT ITS CONTRACTOR AGENCIES
11 TO SEND MESSAGES THAT WOULD HARM POTENTIAL APPLICANTS
12 WHO FEAR BEING STIGMATIZED AND HUMILIATED, AND THESE ARE
13 PEOPLE WHO HAVE BEEN SUBJECT OFTEN TO SOME
14 STIGMATIZATION AND HUMILIATION. THEY MAY WELL BE
15 DETERRED AND NOT WANT TO GO THROUGH THAT AGAIN.

16 ALSO THERE IS A POTENTIAL THAT IT COULD
17 HARM -- THE MESSAGE WOULD BE THAT, YOU KNOW, SOME
18 APPLICANTS NEED NOT APPLY. AND THE CITY SHOULD BE ABLE
19 TO ENFORCE ITS WELL-ESTABLISHED ANTIDISCRIMINATION LAWS
20 AND POLICIES. THE CITY OF PHILADELPHIA AND THE FAIR
21 PRACTICES ORDINANCE AND ASSOCIATED POLICIES HAVE BEEN IN
22 EFFECT FOR DECADES. THIS IS NOT SOMETHING NEW.

23 SO FOR THIS COURT TO ORDER ANYTHING
24 BEYOND WHAT DHS IS ALREADY DOING, WHICH IS MAKING
25 PLACEMENTS WITH CATHOLIC WHEN CASE-SPECIFIC FACTORS SUCH

1 AS SIBLING PLACEMENTS ARE IN THE BEST INTEREST OF THOSE
2 CHILDREN, WOULD ACT TO UNDERMINE DHS'S DETERMINATIONS
3 AND TO HARM THE CITY'S DECADES-LONG EFFORTS TO BATTLE
4 DISCRIMINATION. THIS WOULD IRREPARABLY HARM THE CITY
5 AND IS NOT IN THE PUBLIC INTEREST. IN ADDITION, AN
6 INJUNCTION HERE WOULD NOT RESTORE THE STATUS QUO. THE
7 CURRENT CONTRACT, WHICH APPARENTLY CATHOLIC SOCIAL
8 SERVICES WANTS TO EXTEND OVER THE EXPIRATION DATE, DOES
9 ACTUALLY NOT REQUIRE US TO PROVIDE ANY INTAKE OR
10 SPECIFIC NUMBERS OF CHILDREN TO ANY AGENCY, TO CSS. CSS
11 IS ACTUALLY ASKING OR SEEKING TO FORCE THE CITY TO ENTER
12 INTO -- TO EITHER EXTEND A CONTRACT WITH TERMS THAT ARE
13 NOT IN THERE OR TO ENTER INTO A NEW CONTRACT ON TERMS
14 WHICH THE CITY HAS REJECTED AS TO ANY OTHER CONTRACTOR
15 AGENCY.

16 AND FINALLY, AN INJUNCTION WOULD PUT THE
17 CITY IN THE POSITION OF KNOWINGLY PROVIDING FOSTER CARE
18 SERVICES WITH RELIGIOUS CRITERIA, INCLUDING CATHOLIC
19 SOCIAL SERVICES' ADMITTED NOW USE OF PASTORAL LETTERS
20 WHICH RAISE ADDITIONAL CONSTITUTIONAL ISSUES, SO THAT
21 EVEN IF THE CLAIMS WHICH UNDERLIE THEIR MOTION FOR
22 PRELIMINARY INJUNCTION AND TRO WOULD BE RULED UPON BY
23 THIS COURT, THERE ARE NEW ISSUES WHICH WOULD CAUSE US TO
24 BE UNABLE TO CONTRACT WITH THEM.

25 GIVE ME A SECOND, YOUR HONOR.

1 JUST ONE MORE -- I NOTED DURING MR.
2 RIENZI'S ARGUMENT THAT HE SEEMED TO BE ARGUING THAT
3 THERE WAS NO PROBLEM IF THERE WERE NO COMPLAINTS. THE
4 CONTRACT OBLIGATION NOT TO DISCRIMINATE, CATHOLIC SOCIAL
5 SERVICES HAS TOLD US IT CANNOT COMPLY WITH THAT.
6 DISCRIMINATION IS NOT OKAY BASED ON THE NUMBER OR LACK
7 OF NUMBER OF COMPLAINTS.

8 BUT FOR ALL THESE REASONS, BECAUSE
9 CATHOLIC SOCIAL SERVICES HAS NOT BEEN ABLE TO MEET ANY
10 OF THE PRONGS OF THE INJUNCTION STANDARD, THE CITY
11 RESPECTFULLY REQUESTS THAT ITS MOTION BE DENIED. BUT I
12 HAVE ONE LAST REQUEST, WHICH IS THAT BECAUSE THE CITY
13 JUST BECAME AWARE OF THAT PASTORAL LETTER REQUIREMENT ON
14 TUESDAY, IT HAD NOT BEEN PART OF OUR PRIOR BRIEFING. IF
15 THE COURT FEELS IT WOULD BE HELPFUL AS TO THE ADDITIONAL
16 PROBLEMS WHICH WE BELIEVE THIS REQUIREMENT RAISES, WE
17 HAVE PREPARED A VERY SHORT LETTER BRIEF WHICH WE WOULD
18 BE HAPPY TO HAND TO THE COURT, IF THE COURT DESIRES.

19 THE COURT: OKAY. YOU CAN HAND IT UP.

20 MS. EWING: THANK YOU. THANK YOU, YOUR
21 HONOR.

22 THE COURT: THANK YOU.

23 MR. RIENZI: YOUR HONOR, IS IT ME OR IS
24 IT THE ACLU NEXT?

25 THE COURT: THE ACLU IS NEXT.

1 MR. RIENZI: THAT'S WHAT I THOUGHT.

2 MS. COOPER: GOOD AFTERNOON, YOUR HONOR.

3 THE COURT: GOOD AFTERNOON.

4 MS. COOPER: AND THANK YOU FOR THE
5 OPPORTUNITY TO BE HEARD.

6 PLAINTIFFS ARE ASKING THE COURT TO ISSUE
7 AN EXTRAORDINARY RULING OF LAW. THEY ARE ASKING THE
8 COURT TO HOLD THAT AN ORGANIZATION THAT ENTERS INTO A
9 CONTRACT WITH THE GOVERNMENT TO PROVIDE A GOVERNMENT
10 SERVICE HAS A RIGHT TO THEN ALTER THAT PROVISION OF --
11 THE PROVISION OF THAT PUBLIC SERVICE TO CONFORM TO ITS
12 RELIGIOUS BELIEFS. LIKE MANY PUBLIC CHILD WELFARE
13 SYSTEMS AROUND THE COUNTRY, THE CITY HAS CHOSEN TO
14 MAXIMIZE CHILDREN'S FAMILY PLACEMENT OPTIONS BY BARRING
15 DISCRIMINATION BASED ON RACE, RELIGION, SEXUAL
16 ORIENTATION AND OTHER CHARACTERISTICS THAT HAVE NO
17 BEARING ON ONE'S ABILITY TO CARE FOR A CHILD.

18 CSS' RELIGIOUS BELIEFS DO NOT ENTITLE IT
19 TO ACCEPT THE CITY CONTRACTS AND TAXPAYER DOLLARS TO
20 PERFORM SOME CHILD WELFARE SERVICES ON BEHALF OF THE
21 CITY AND THEN COMMANDEER THE SYSTEM TO IMPOSE ITS OWN
22 STANDARDS. THE POTENTIAL CONSEQUENCES OF SUCH A RULING
23 ARE PRETTY STAGGERING. JUST THINK, WHAT IF THERE WERE
24 AN AGENCY THAT HELD A RELIGIOUS BELIEF THAT CHILDREN
25 MUST BE SUBJECTED TO CORPORAL PUNISHMENT THAT VIOLATES

1 STATE CHILD ABUSE LAWS. THERE ARE PLENTY OF RELIGIOUS
2 FAITHS WITH BELIEFS ABOUT THAT. WHAT IF THERE WERE A
3 RELIGIOUS AGENCY THAT HAD A RELIGIOUS OBJECTION TO
4 PROVIDING MEDICAL TREATMENT TO CHILDREN WHO ARE INJURED
5 OR SICK. THE IMPLICATIONS OF THE LEGAL RULING THAT
6 PLAINTIFFS ARE ASKING FOR CANNOT BE CONFINED TO
7 RELIGIOUS-BASED OBJECTIONS TO SAME-SEX COUPLES, BECAUSE
8 UNDER THE ESTABLISHMENT CLAUSE, THE GOVERNMENT AND THE
9 COURTS CANNOT GIVE PREFERENCE TO SOME RELIGIOUS BELIEFS
10 OTHER OTHERS. YOU CAN'T SAY, THIS RELIGIOUS BELIEF WE
11 WILL DEFER TO AND APPROVE, THIS RELIGIOUS BELIEF WE ARE
12 NOT GOING TO GIVE YOU THE SAME TREATMENT.

13 THE FACT THAT PLAINTIFFS ARE ASKING THE
14 COURT TO ORDER THE CITY TO ALLOW THIS KIND OF FREE REIN
15 BY RELIGIOUSLY-AFFILIATED CONTRACT AGENCIES DEMONSTRATES
16 A PROFOUND MISUNDERSTANDING OF THE RIGHT TO FREE
17 EXERCISE OF RELIGION. THE RIGHT TO FREE EXERCISE
18 PROTECTS AGAINST GOVERNMENT INTERFERENCE WITH RELIGIOUS
19 INSTITUTIONS; PURSUIT OF THEIR OWN INTERESTS. THE
20 SUPREME COURT SAID THAT VERY CLEARLY IN THE KIRYAS JOEL
21 CASE. THE RIGHT TO FREE EXERCISE DOES NOT ESTABLISH A
22 RIGHT TO HAVE THE GOVERNMENT CREATE OPPORTUNITIES FOR
23 YOU TO EXERCISE YOUR RELIGION AND THEN FUND THOSE
24 OPPORTUNITIES. INDEED, FUNDING RELIGIOUS ACTIVITIES
25 DIRECTLY VIOLATES THE ESTABLISHMENT CLAUSE, AS I WILL

1 DISCUSS IN A FEW MOMENTS.

2 IN THE BRIEFING, THE PLAINTIFFS RELY ON,
3 I BELIEVE, TRINITY LUTHERAN, AND THAT'S A CASE THAT IS
4 OFTEN MISCHARACTERIZED IN THIS KIND OF DISCOURSE AROUND
5 THESE ISSUES. THIS CASE DOES NOT SUPPORT THE
6 EXTRAORDINARY CLAIM PLAINTIFFS MAKE HERE. IT
7 ESTABLISHES FOR SURE THAT THE GOVERNMENT COULD NOT
8 DISQUALIFY RELIGIOUS ORGANIZATIONS FROM A PUBLIC BENEFIT
9 BECAUSE OF THEIR RELIGIOUS IDENTITY. BUT EVEN IF A
10 GOVERNMENT CONTRACT TO PERFORM A GOVERNMENT SERVICE
11 COULD BE CONSIDERED A PUBLIC BENEFIT, WHICH OF COURSE IT
12 IS NOT, AS SOME CASES IN OUR BRIEF MAKE CLEAR, BUT EVEN
13 ASSUMING IT WERE, THE CITY HAS NOT DENIED CSS A CONTRACT
14 OR REFERRALS OF CHILDREN BECAUSE IT IS CATHOLIC OR EVEN
15 BECAUSE IT HOLDS RELIGIOUS BELIEFS. THE CITY SUSPENDED
16 REFERRALS BECAUSE OF CSS' REFUSAL TO COMPLY WITH ITS
17 NONDISCRIMINATION REQUIREMENT. TRINITY LUTHERAN IN NO
18 WAY SUGGESTS THAT A CONTRACT AGENCY'S RELIGIOUS BELIEFS
19 GIVE IT THE RIGHT TO DICTATE HOW IT PROVIDES
20 GOVERNMENT-CONTRACTED SERVICES.

21 BUT ALSO I WANT TO ADDRESS VERY BRIEFLY
22 THE SPEECH CLAIM, AND I JUST HAVE A VERY SMALL AMOUNT TO
23 ADD TO WHAT THE CITY HAD TO SAY ABOUT THAT. BUT THE
24 AGENCY FOR INTERNATIONAL DEVELOPMENT CASE IS VERY CLEAR
25 IN DISTINGUISHING BETWEEN SPEECH THAT IS PART OF THE

1 SCOPE OF THE CONTRACT, AND WHEN THE GOVERNMENT LEVERAGES
2 A CONTRACT TO TRY TO PROHIBIT SPEECH THAT AN ENTITY
3 ENGAGES IN OUTSIDE THE SCOPE OF THE CONTRACT. JUST
4 BECAUSE -- I THINK IF PHILADELPHIA WERE TO TELL CATHOLIC
5 SOCIAL SERVICES THAT IT COULD NOT ENGAGE IN SPEECH IN
6 OTHER DOMAINS, THAT WOULD BE A CONSTITUTIONAL PROBLEM
7 AND WE WOULD BE STANDING WITH THEM ON THAT FOR SURE.
8 BUT THE SPEECH THEY ARE TALKING ABOUT, PROVIDING HOME
9 STUDIES AND CERTIFICATIONS OF FOSTER PARENTS, THAT IS
10 PRECISELY WHAT THE CONTRACT IS ABOUT.

11 NOW, I DON'T THINK WE HEARD FROM THE
12 PLAINTIFFS ABOUT REALLY THE OTHER MAJOR PROBLEM WITH
13 THEIR THEORY, WHICH IS THE ESTABLISHMENT CLAUSE. THE
14 FIRST AMENDMENT DOES HAVE TWO PARTS, AND THE OTHER -- OR
15 AT LEAST ABOUT RELIGION, AND THE OTHER PART IS THE
16 ESTABLISHMENT CLAUSE. AND SO NOT ONLY DOES THE CITY
17 HAVE NO LEGAL OBLIGATION TO PERMIT ITS CONTRACT AGENCIES
18 TO IMPOSE RELIGIOUS ELIGIBILITY CRITERIA ON PROSPECTIVE
19 FOSTER PARENTS, IF IT DID SO, THE CITY ITSELF WOULD BE
20 VIOLATING THE ESTABLISHMENT CLAUSE. THE ESTABLISHMENT
21 CLAUSE PROHIBITS THE USE OF RELIGIOUS ELIGIBILITY
22 CRITERIA IN THE PROVISION OF GOVERNMENT SERVICES,
23 WHETHER THAT SERVICE IS PROVIDED BY GOVERNMENT EMPLOYEES
24 THEMSELVES, DHS EMPLOYEES, OR ORGANIZATIONS CONTRACTED
25 BY THE GOVERNMENT TO PERFORM THAT GOVERNMENT FUNCTION.

1 THE PHILADELPHIA DEPARTMENT OF HUMAN SERVICES COULD
2 CERTAINLY NOT SCREEN OUT PROSPECTIVE FOSTER FAMILIES
3 BASED ON FAILURE TO MEET A RELIGIOUS TEST. IT COULD NOT
4 SAY ONLY CHRISTIANS OR ONLY JEWS, CANNOT SAY NO SAME-SEX
5 COUPLES BECAUSE OF OUR RELIGIOUS OBJECTION. THEREFORE,
6 THE AGENCY THAT HIRES AND PAYS WITH TAXPAYER DOLLARS TO
7 PERFORM THIS VERY SERVICE THAT IS A GOVERNMENT FUNCTION
8 CANNOT DO SO EITHER.

9 AND THE SUPREME COURT MADE CRYSTAL CLEAR
10 IN THE LARKIN CASE AND THE KIRYAS JOEL THAT THE
11 ESTABLISHMENT CLAUSE PROHIBITS THE GOVERNMENT FROM
12 DELEGATING A GOVERNMENT FUNCTION TO A PRIVATE ENTITY AND
13 THEN ALLOWING THAT GOVERNMENT FUNCTION TO BE PERFORMED
14 USING RELIGIOUS CRITERIA.

15 IN ADDITION, THERE IS THE FUNDING ISSUE I
16 TOUCHED ON EARLIER. THE SUPREME COURT HAS MADE
17 ABSOLUTELY CLEAR IN CASE AFTER CASE THAT THE
18 ESTABLISHMENT CLAUSE BARS THE GOVERNMENT FUNDING OF
19 RELIGIOUS ACTIVITY. HERE, ALLOWING THE USE OF RELIGIOUS
20 CRITERIA IN THE SCREENING OF PROSPECTIVE FOSTER PARENTS,
21 WHICH IS A GOVERNMENT FUNCTION, AGAIN UNDER CONTRACT
22 WITH THE STATE TO PERFORM THIS GOVERNMENT FUNCTION, THAT
23 IS RELIGIOUS ACTIVITY. AND I WOULD JUST POINT TO THE
24 BOWEN V. KENDRICK CASE WHERE THE SUPREME COURT
25 RECOGNIZED THAT ALLOWING RELIGIOUS-BASED DISCRIMINATION

1 BY A GOVERNMENT-FUNDED SERVICE PROVIDER WOULD BE ONE
2 FORM OF IMPERMISSIBLY ADVANCING RELIGION.

3 THERE IS A THIRD REASON WHY ALLOWING
4 CONTRACT AGENCIES TO USE RELIGIOUS CRITERIA IN THE
5 FOSTER LICENSING PROCESS WOULD VIOLATE THE ESTABLISHMENT
6 CLAUSE, AND THAT THERE IS A LINE OF SUPREME COURT CASES
7 THAT SAYS THAT WHEN THE GOVERNMENT PREFERENCES RELIGION
8 TO THE DETRIMENT OF OTHERS, TO THE DETRIMENT OF THIRD
9 PARTIES, THAT'S A VIOLATION OF THE ESTABLISHMENT CLAUSE,
10 AND I WOULD POINT THE COURT TO THE ESTATE OF THORNTON AS
11 A SEMINAL CASE ON THAT POINT. HERE, ACCEPTING
12 PLAINTIFF'S POSITION WOULD CAUSE SIGNIFICANT HARM TO THE
13 CHILDREN IN THE CHILD WELFARE SYSTEM BY DEPRIVING THEM
14 OF GOOD FAMILIES AND CAUSE HARM TO THE WOULD-BE FAMILIES
15 WHO SEEK TO CARE FOR THEM.

16 PLAINTIFFS WILL LIKELY SAY THIS IS A
17 QUESTION OF RELIGIOUS ACCOMMODATION, IF THEY COME BACK
18 UP AGAIN. AND, YOU KNOW, THERE ARE LOTS OF
19 ACCOMMODATION CASES IN THE SUPREME COURT AND OTHER
20 COURTS. BUT THIS IS NOT RELIGIOUS ACCOMMODATION. THE
21 CASES LIKE AMIS AND HOSANNA TABOR, THOSE CASES INVOLVE
22 ACCOMMODATING RELIGIOUS ORGANIZATIONS TO GET EXEMPTIONS
23 FROM GENERALLY-APPLICABLE LAWS THAT APPLY TO EVERYBODY
24 IN THEIR OWN PRIVATE ACTIVITIES.

25 THIS IS NOT ABOUT ACCOMMODATION. THIS IS

1 ABOUT A CASE -- THIS IS A CASE IN WHICH THEY ARE ASKING
2 FOR THE GOVERNMENT TO DELEGATE THIS GOVERNMENT FUNCTION
3 TO THIS ORGANIZATION, AND FOR THE GOVERNMENT TO THEN
4 ALLOW THEM TO PROVIDE THOSE GOVERNMENT SERVICES USING
5 RELIGIOUS CRITERIA, AND THAT IS ABSOLUTELY WHAT THE
6 ESTABLISHMENT CLAUSE PROHIBITS.

7 TURNING BACK TO THE HARMS THAT WOULD
8 RESULT, THOSE ALSO GO TO THE BALANCE OF EQUITIES, OF
9 COURSE, AND A FURTHER REASON WHY THE REQUESTED TRO AND
10 PI SHOULD BE DENIED. AND IN FACT, IT IS THESE VERY
11 HARMS THAT CAUSED PROPOSED INTERVENORS OF MAKING TO --
12 TO SEEK TO PARTICIPATE IN THIS CASE. ALLOWING
13 DISCRIMINATION BY AGENCIES THAT HAVE RELIGIOUS
14 OBJECTIONS TO SAME-SEX COUPLES WOULD HARM THE AT-RISK
15 CHILDREN THAT THE FOSTER CARE SYSTEM IS MEANT TO PROTECT
16 AS WELL AS THE FAMILIES WHO WOULD CARE FOR THEM, AND
17 THESE HARMS ARE VERY MUCH INTERTWINED. STARTING WITH
18 THE FAMILIES, JUST TO SORT OF UNPACK IT A LITTLE BIT.

19 THE FAMILIES CAN BE HARMED IN A VARIETY
20 OF WAYS. STARTING WITH THOSE WHO MAYBE GO TO -- WOULD
21 GO TO CATHOLIC SOCIAL SERVICES OR ANY LIKE-MINDED
22 AGENCIES IF THE COURT WERE TO RULE IN THEIR FAVOR.
23 THOSE PEOPLE COULD BE SUBJECT TO DISCRIMINATION, AND THE
24 SUPREME COURT IN HEART OF ATLANTA AND OTHER CASES HAS
25 RECOGNIZED THE DEGRADATION AND THE HUMILIATION AND

1 EMBARRASSMENT THAT CAN COME WITH DISCRIMINATION. THIS
2 IS A SERIOUS HARM THAT THE SUPREME COURT HAS RECOGNIZED.
3 AND THAT DEGRADATION, THE DEGRADATION OF THAT KIND OF
4 EXPERIENCE IS NOT LESSENER BY THE FACT THAT THE
5 DISCRIMINATION IS DONE POLITELY OR THAT IT IS CALLED A,
6 QUOTE, REFERRAL. "WE WILL NOT SERVE YOUR KIND" IS A
7 DEGRADING HUMILIATING EXPERIENCE THAT THE CITY CLEARLY
8 HAS A COMPELLING INTEREST IN WANTING TO PREVENT.

9 IN ADDITION, ALL PROSPECTIVE FOSTER
10 PARENTS HEADED BY A SAME-SEX COUPLE WOULD FACE THE
11 UNCERTAINTY ABOUT WHETHER THEY WOULD FACE DISCRIMINATION
12 IN THE PROCESS, MAKING IT MORE DIFFICULT, STRESSFUL. IF
13 THE COURT WERE TO ACCEPT PLAINTIFFS' POSITION AND THE
14 LGBT COMMUNITY WERE TO LEARN THAT IN PHILADELPHIA,
15 PURSUING FOSTER PARENTING COMES WITH THE RISK OF
16 EXPOSURE TO LAWFUL DISCRIMINATION AGAINST THEM. AND A
17 RULE OF LAW WOULD SAY, AGENCIES ARE LAWFULLY ENTITLED TO
18 DISCRIMINATE AGAINST LGBT OR PEOPLE OF SAME-SEX COUPLES,
19 IT IS HARD TO FATHOM HOW MANY PEOPLE COULD BE DETERRED
20 FROM SUBJECTING THEMSELVES TO THAT PROCESS, KNOWING THAT
21 IT IS PERFECTLY LEGAL TO DISCRIMINATE AGAINST THEM IN
22 THE PROCESS.

23 FINALLY ON THIS TOPIC, EVEN IF THERE WERE
24 CLARITY ABOUT WHICH AGENCIES DISCRIMINATE AND SOME
25 COUPLES WERE WELL-ENOUGH INFORMED TO AVOID THE AGENCIES

1 THAT WOULD NOT ACCEPT THEM, THAT MEANS THAT SAME-SEX
2 COUPLE FAMILIES OR PROSPECTIVE FAMILIES HEADED BY
3 SAME-SEX COUPLES GET A REDUCED CHOICE OF AGENCY OPTIONS.
4 THE PLAINTIFFS TALK A LOT ABOUT 28 AGENCIES AVAILABLE,
5 WHAT IS THE BIG DEAL. THERE ARE 28 OTHER AGENCIES
6 AVAILABLE. IMAGINE A SCHEME IN WHICH YOU HAD A SYSTEM
7 WHERE SAY CHRISTIANS GET THE CHOICE OF 30 AGENCIES AND
8 EVERYBODY ELSE GETS 28, OR WHITE PEOPLE GET 30 AGENCIES,
9 AFRICAN AMERICANS HAVE TO SETTLE FOR FEWER OPTIONS.
10 THAT IS A STIGMATIZING SYSTEM FOR THE CITY TO IMPOSE ON
11 ITS POPULATION.

12 ALSO, PUT ASIDE THE STIGMA, THE REDUCED
13 OPTIONS WOULD MEAN THAT SOME FAMILIES WOULD NOT BE ABLE
14 TO WORK WITH THE AGENCY AMONG THE EXISTING AGENCIES THAT
15 MIGHT BE MOST APPROPRIATE FOR THEM. THE PLAINTIFFS
16 EMPHASIZED THAT -- PARTICULARLY THE INDIVIDUAL
17 PLAINTIFFS, THAT THE SERVICES OF CSS ARE SO OUTSTANDING
18 THAT THEY ARE NOT SURE THAT THEY WOULD CONTINUE
19 FOSTERING IF THEY COULD NOT WORK WITH CSS, EVEN IF THAT
20 MEANT CEASING TO CARE FOR THE CHILDREN THEY OBVIOUSLY
21 LOVE. YET PLAINTIFFS' POSITION IS THAT SAME-SEX COUPLES
22 SHOULD NOT BE ABLE TO BENEFIT FROM THOSE SERVICES AND
23 INSTEAD SHOULD HAVE TO ACCEPT AGENCIES THAT ARE
24 COMPLETELY UNACCEPTABLE TO INDIVIDUAL PLAINTIFFS.

25 IN ADDITION, WE HEARD TESTIMONY ABOUT HOW

1 DIFFERENT AGENCIES HAVE DIFFERENT EXPERTISE IN TERMS OF
2 THE CHILDREN THAT THEY CARE FOR. SO IF IT HAPPENED TO
3 BE A FAITH-BASED AGENCY OBJECTING TO SAME-SEX COUPLES OR
4 -- LET'S PUT IN ANY OTHER SUBSTITUTE GROUP, BECAUSE OF
5 COURSE A RULING HERE WOULD REPLY TO ANY RELIGIOUS-BASED
6 OBJECTION TO ANY GROUP, SO AN AGENCY THAT HAD A
7 RELIGIOUS-BASED OBJECTION TO INTERRACIAL COUPLES OR TO
8 X, Y, Z GROUPS, SAME-SEX COUPLES. IF THAT AGENCY
9 HAPPENED TO BE ONE OF THE AGENCIES THAT SPECIALIZES IN
10 MEDICALLY NEEDY CHILDREN, I FORGET THE PARTICULAR
11 TERMINOLOGY, THAT WOULD MEAN THAT A FAMILY IN THAT
12 GROUP, THE INTERRACIAL COUPLE OR THE SAME-SEX COUPLE WHO
13 WANTED TO CARE FOR A MEDICALLY NEEDY CHILD, PERHAPS THEY
14 ARE DOCTORS OR NURSES, WOULD NOT HAVE THE OPTION OF
15 WORKING WITH THAT AGENCY. SO THERE WAS A LOT OF TALK OF
16 THE CHILDREN NOT BEING WIDGETS AND FUNGIBLE, WHICH IS
17 ABSOLUTELY -- I AGREE WITH THAT. ALSO THE AGENCIES ARE
18 NOT NECESSARILY FUNGIBLE. SO GIVING A MENU OF OPTIONS
19 FOR HETEROSEXUAL COUPLES AND A REDUCED SET OF OPTIONS
20 FOR SAME-SEX COUPLES IS HARMFUL, AGAIN FOR THE STIGMA
21 REASON AND FOR THE PRACTICAL REASON.

22 TURNING TO THE INTEREST OF THE CHILDREN,
23 TURNING AWAY QUALIFIED FOSTER PARENTS BASED ON RELIGIOUS
24 CRITERIA CONFLICTS WITH THE PROFESSIONAL AND ACCEPTED
25 CHILD WELFARE PRACTICE STANDARDS THAT EXIST TO PROTECT

1 CHILDREN. AND I WOULD REFER THE COURT TO THE CHILD
2 WELFARE LEAGUE OF AMERICA STANDARDS OF EXCELLENCE AND
3 ADOPTION, I BELIEVE FOSTER CARE PRACTICE AS WELL.
4 BECAUSE EACH CHILD'S NEEDS ARE UNIQUE, MEETING THE BEST
5 INTEREST OF A PARTICULAR CHILD MEANS HAVING AS LARGE AND
6 AS DIVERSE A POOL OF QUALIFIED LICENSED FAMILIES AS
7 POSSIBLE TO OPTIMIZE THAT FIT THAT WE HAVE HEARD SOME
8 DISCUSSION ABOUT BETWEEN CHILD AND FAMILY. ESPECIALLY
9 GIVEN THE CURRENT NEED FOR MORE QUALIFIED FAMILIES FOR
10 OLDER YOUTH AND LGBT YOUTH AND PERHAPS OTHER GROUPS, IT
11 IS CONTRARY TO THE INTEREST OF PHILADELPHIA FOSTER
12 CHILDREN FOR THE CITY'S CONTRACTING AGENCIES TO REFUSE
13 TO ACCEPT QUALIFIED PARENTS FOR REASONS THAT ARE
14 UNRELATED ON THE BEST INTEREST OF THE CHILDREN. AND TO
15 REFUSE TO PLACE CHILDREN WITH A CLASS OF FAMILIES THAT
16 MAY JUST INCLUDE THAT FAMILY THAT IS BEST SITUATED OR
17 PERHAPS THE ONLY FAMILY THAT IS AVAILABLE, READY,
18 WILLING AND ABLE TO MEET THE NEEDS OF A PARTICULAR
19 CHILD. IF SAME-SEX COUPLES ARE TURNED AWAY BY CSS AND
20 ANY OTHER LIKE-MINDED AGENCIES, OR DETERRED FROM
21 PURSUING FOSTERING ALTOGETHER BECAUSE THEY KNOW THAT
22 AGENCIES ARE PERMITTED TO DISCRIMINATE AGAINST THEM AND
23 THEY PERHAPS DON'T WANT TO TAKE THAT RISK, CHILDREN LOSE
24 OUT ON GOOD FAMILIES.

25 IT IS ALSO IMPORTANT TO RECOGNIZE THAT --

1 AND I TOUCHED ON THIS EARLIER, THAT IF CSS IS ENTITLED
2 TO REFUSE TO ACCEPT SAME-SEX COUPLES BECAUSE OF ITS
3 RELIGIOUS BELIEFS ABOUT MARRIAGE, THEN ALL FAITH-BASED
4 AGENCIES WILL BE ABLE TO TURN AWAY PROSPECTIVE FAMILIES
5 WHO FAIL TO CONFORM TO ANY OF THEIR RELIGIOUS BELIEFS.
6 AGAIN, THE ESTABLISHMENT CLAUSE PROHIBITS PREFERENCING
7 SOME RELIGIOUS BELIEFS OVER OTHERS. SO SOME
8 DENOMINATIONS DON'T VIEW MARRIAGES BETWEEN PEOPLE OF
9 DIFFERENT FAITHS AS A VALID UNION. SOME DON'T RECOGNIZE
10 SECOND MARRIAGES AFTER DIVORCE. A RELIGIOUS-AFFILIATED
11 AGENCY MIGHT OBJECT TO FOSTER PARENTS WHO WORK ON THE
12 SABBATH AS DEFINED BY THE AGENCY, OR WHO EAT PORK OR WHO
13 ALLOW THEIR CHILDREN TO ATTEND PUBLIC SCHOOLS. AND
14 AGAIN, AS WE LEARNED IN THE HEARINGS THIS WEEK, THAT CSS
15 ITSELF HAS OTHER RELIGIOUS-BASED OBJECTIONS. NO
16 UNMARRIED COUPLES OF ANY SEXUAL ORIENTATION AND NO ONE
17 WHO IS NOT A CHURCH-GOER ABLE TO SECURE A CLERGY LETTER.
18 REQUIRING THE CITY TO ALLOW EACH FOSTER CARE AGENCY TO
19 IMPLEMENT ITS OWN RELIGIOUS CRITERIA FOR FOSTER FAMILIES
20 COULD RESULT IN A PATCHWORK OF SUCH EXCLUSIONS, CREATING
21 EVEN MORE BARRIERS TO FINDING FAMILIES FOR CHILDREN WHO
22 NEED THEM. SO THE CHILDREN'S INTEREST IN GETTING MORE
23 FAMILIES WEIGHS DECIDEDLY AGAINST GRANTING THE REQUESTED
24 RELIEF.

25 BUT IN ADDITION, AGAIN AS I TOUCHED ON

1 EARLIER, IT'S NOT AGENCY CERTIFIED. THE RISK OF A
2 RULING FOR THE PLAINTIFFS NOT ONLY COMPROMISES THE
3 CITY'S ABILITY TO MAXIMIZE FAMILY OPTIONS FOR CHILDREN,
4 IT ALSO OPENS THE DOOR TO GIVING AGENCIES CARTE BLANCHE
5 TO IMPOSE ON CHILDREN WHO ARE WARDS OF THE GOVERNMENT A
6 DENIAL OF SERVICES, MEDICAL SERVICES, NO SCHOOL.
7 WHATEVER THEIR RELIGIOUS BELIEF MIGHT MEAN. AGAIN
8 CORPORAL PUNISHMENT THAT -- BASED ON A BIBLICAL VIEW
9 THAT MAY VIOLATE STATE CHILD ABUSE LAWS, IT WOULD OPEN
10 UP THE DOOR TO ALLOWING AN UNLIMITED NUMBER OF POTENTIAL
11 HARMS TO CHILDREN.

12 I WANT TO TOUCH VERY BRIEFLY ON WHAT IS
13 FELT TO BE PERHAPS A SUGGESTION BY PLAINTIFFS' COUNSEL
14 THAT THE CITY'S KNOWLEDGE THAT CSS HAS RELIGIOUS BELIEFS
15 ABOUT MARRIAGE MEANS THAT -- OR THIS IS HOW I UNDERSTOOD
16 IT, ANYWAY -- MEANS THAT THE CITY WAS AWARE ALL ALONG
17 THAT CSS PUT THOSE RELIGIOUS BELIEFS ABOVE THE
18 PROFESSIONAL ESTABLISHED CHILD WELFARE STANDARDS OF
19 ACCEPTING ALL QUALIFIED FAMILIES TO GIVE CHILDREN THE
20 BEST ARRAY OF PLACEMENT OPTIONS. THERE IS NO BASIS FOR
21 THIS ASSUMPTION. THERE ARE NUMEROUS FAITH-BASED
22 AGENCIES THAT HOLD RELIGIOUS BELIEFS ABOUT MARRIAGE AND
23 HOLD LOTS OF RELIGIOUS BELIEFS THAT MAY BE RELEVANT.
24 BUT THEY KNOW THAT THEY PUT THE CHILD WELFARE
25 PROFESSIONAL STANDARDS AND THE INTEREST OF CHILDREN

1 FIRST. INDEED, AS WE HEARD IN THIS CASE, BETHANY
2 CHRISTIAN SERVICES, WHICH APPARENTLY HAS SIMILAR
3 RELIGIOUS BELIEFS ABOUT MARRIAGE AS CSS, APPARENTLY IS
4 WILLING TO COMPLY WITH THE TERMS OF THE
5 NONDISCRIMINATION REQUIREMENT.

6 I DO WANT TO SAY JUST A FEW WORDS ABOUT
7 PLAINTIFFS' RELIANCE ON THE MASTERPIECE CAKESHOP CASE.
8 TO SUPPORT IT, THEY ARGUE THAT THAT SUPPORTS ITS
9 CONTENTION THAT THE CITY'S ENFORCEMENT OF ITS
10 NONDISCRIMINATION REQUIREMENT WAS BASED ON HOSTILITY
11 TOWARDS CSS' RELIGIOUS BELIEFS. NONE OF THE EVIDENCE
12 THE PLAINTIFFS CLAIM SUPPORT THIS ACCUSATION CREATES ANY
13 INFERENCE THAT THE CITY'S ENFORCEMENT WAS BASED ON
14 ANTIRELIGIOUS ANIMUS AS OPPOSED TO A DESIRE TO ENSURE
15 THAT ALL PROSPECTIVE FAMILIES ARE WELCOMED. THEY
16 DISTORT THE MASTERPIECE RULING BEYOND RECOGNITION. JUST
17 TO GIVE SOME EXAMPLES, THERE IS SIMPLY NOTHING HOSTILE
18 TO RELIGION ABOUT THE STATEMENT THAT QUOTE, WE CANNOT
19 USE TAXPAYER DOLLARS TO FUND ORGANIZATIONS THAT
20 DISCRIMINATE AGAINST PEOPLE BECAUSE OF THEIR SEXUAL
21 ORIENTATION OR SAME-SEX MARRIAGE STATUS, IT'S NOT RIGHT.
22 THAT WAS AN EXAMPLE OF A STATEMENT THAT THEY DEEMED
23 HOSTILE TO RELIGION. IF MERE DISAGREEMENT WITH
24 PERMITTING GOVERNMENT FUNDING OF DISCRIMINATION
25 CONSTITUTES IMPERMISSIBLE HOSTILITY TOWARDS RELIGION,

1 THAT WOULD PRECLUDE ANY ENFORCEMENT OF NONDISCRIMINATION
2 REQUIREMENTS AGAINST GOVERNMENT CONTRACTORS WHO REFUSE
3 TO COMPLY BASED ON RELIGIOUS OBJECTIONS. MASTERPIECE
4 DID NOT SAY THIS.

5 NOR DOES THE CITY'S STATEMENT THAT QUOTE,
6 WE WOULD NOT ALLOW SUCH DISCRIMINATION AGAINST, FOR
7 EXAMPLE, CATHOLIC COUPLES OR MIXED RACE COUPLES AND WE
8 CANNOT ALLOW IT WITH RESPECT TO SAME-SEX COUPLES EITHER
9 CONSTITUTE HOSTILITY TOWARDS RELIGION. MASTERPIECE DOES
10 NOT MEAN THAT REFERENCING OTHER FORMS OF DISCRIMINATION
11 IN THE CONTEXT OF A DISCUSSION ABOUT
12 RELIGIOUSLY-MOTIVATED SEXUAL ORIENTATION DISCRIMINATION
13 IMPERMISSIBLY SHOWS HOSTILITY TOWARDS RELIGION. INDEED,
14 THE MASTERPIECE CASE ITSELF, IN THAT CASE ITSELF THE
15 COURT CITED PIGGIE PARK, ONE OF THE MOST FAMOUS RACE
16 DISCRIMINATION CASES IN THE COUNTRY, FOR THE PROPOSITION
17 THAT RELIGIOUS OBJECTIONS GENERALLY, QUOTE, DO NOT ALLOW
18 BUSINESS OWNERS AND OTHER ACTORS IN THE ECONOMY AND IN
19 SOCIETY TO DENY PROTECTED PERSONS EQUAL ACCESS TO GOODS
20 AND SERVICES UNDER A NEUTRAL AND GENERALLY-APPLICABLE
21 PUBLIC ACCOMMODATION CLAUSE. SO UTTERING RACE
22 DISCRIMINATION IN THE SAME BREATH AS SEXUAL ORIENTATION
23 DISCRIMINATION OR OTHER FORMS OF DISCRIMINATION DOES NOT
24 AMOUNT TO HOSTILITY TOWARDS RELIGION.

25 INTERESTINGLY, THOUGH, PLAINTIFFS'

1 PROTEST OF THIS STATEMENT FROM THE CITY AS, QUOTE,
2 COMPARING CSS RELIGIOUS BELIEFS TO RACIST
3 DISCRIMINATION, CLOSE QUOTE, SEEMS TO BE AN
4 ACKNOWLEDGMENT, AS I READ IT, THAT IT WOULD BE IMPROPER
5 TO ALLOW RELIGIOUSLY-AFFILIATED AGENCIES TO EXCLUDE
6 PROSPECTIVE FAMILIES BASED ON A RELIGIOUS OBJECTION TO
7 SAY INTERRACIAL COUPLES. YET THEY SEEM TO BE SUGGESTING
8 THAT THEIR RELIGIOUS BELIEFS ABOUT WHO SHOULD BE FOSTER
9 PARENTS DESERVES THE CITY'S APPROVAL AND DEFERENCE.
10 BUT, OF COURSE, AGAIN, THE ESTABLISHMENT CLAUSE DOES NOT
11 ALLOW THAT PICKING AND CHOOSING.

12 AND THE COMMENTS FROM THE MAYOR FROM
13 SEVERAL YEARS AGO, YOU KNOW, THAT THAT SOMEHOW YOU CAN
14 DOT THAT -- CONNECT THE DOTS TO SAY THAT THAT
15 DEMONSTRATES THE CITY'S DECISION IN 2018 TO ENFORCE THIS
16 CONTRACT DEMONSTRATES HOSTILITY TOWARDS CSS'S FAITH.
17 MASTERPIECE DOES NOT SUPPORT THAT GIANT LEAP. IN THAT
18 CASE THEY WERE TALKING ABOUT THE ADJUDICATIVE STATEMENT
19 FROM A MEMBER OF THE ADJUDICATIVE BODY THAT WAS CHARGED
20 WITH HEARING A DISCRIMINATION COMPLAINT. THE COURT IN
21 NO WAY SUGGESTED THAT HAD COLORADO OFFICIALS EVER
22 EXPRESSED DISAGREEMENT WITH THE LEADERSHIP OF THE
23 BUSINESS OWNER'S FAITH COMMUNITY THAT ENFORCEMENT OF
24 STATE LAWS AGAINST THE BUSINESS OWNER OR ANY
25 ORGANIZATIONS AFFILIATED WITH HIS FAITH WOULD BE FOREVER

1 ASSUMED TO BE BASED ON HOSTILITY TOWARD FAITH.

2 I JUST HAVE A BIT MORE, IF THE COURT WILL
3 INDULGE. I FEEL COMPELLED TO DISCUSS THE PLAINTIFFS'
4 USE OF THE "REFERRALS" TERMINOLOGY. THEY SEEM TO BE
5 ATTEMPTING TO SHOEHORN THIS CASE INTO LUKUMI TO CLAIM
6 SELECTIVE ENFORCEMENT BY CITING THE FACT THAT AGENCIES
7 MAY REFER FAMILIES TO OTHER AGENCIES THAT HAVE SPECIAL
8 EXPERTISE. THESE ARE NOT EXEMPTIONS FROM THE CITY'S
9 NONDISCRIMINATION REQUIREMENT. THEY ARE COMPARING
10 APPLES TO ORANGES. USING THE NOMENCLATURE "REFERRAL"
11 DOES NOT MAKE THE REFUSAL TO ACCEPT SAME-SEX COUPLES ANY
12 LESS DISCRIMINATORY. THEY ARE USING SMOKE AND MIRRORS
13 WITH THIS REFERRAL LANGUAGE TO MAKE DISCRIMINATION
14 APPEAR BENEVOLENT TOWARDS THE FAMILIES DISCRIMINATED
15 AGAINST UNDER THEIR POLICY.

16 CSS IS NOT SIMPLY ADVISING PROSPECTIVE
17 PARENTS THAT OTHER AGENCIES MAY BE A BETTER FIT FOR THEM
18 OR MAY, YOU KNOW, GIVE THEM A CHOICE OF OTHER AGENCIES.
19 THEY ARE REFUSING SERVICE TO SAME-SEX COUPLES, PERIOD.
20 I THINK IF AN AGENCY HAD A POLICY OF REFUSING TO ACCEPT
21 INTERRACIAL COUPLES OR NONCHRISTIANS, I THINK EVEN
22 PLAINTIFFS WOULD AGREE THAT THIS IS DISCRIMINATION EVEN
23 IF THE AGENCY REFERRED THOSE FAMILIES TO OTHER AGENCIES
24 POLITELY AND REFUSED TO SERVE THEM.

25 ONE LAST THING THAT WAS JUST MENTIONED IN

1 THE CROSS EXAMINATION. PLAINTIFFS SEEM TO BE IMPLYING
2 THAT THE CITY'S REFUSAL TO ALLOW THE USE OF THE
3 RELIGIOUS ELIGIBILITY CRITERIA IN ITS PUBLIC CHILD
4 WELFARE SYSTEM TO EXCLUDE SAME-SEX COUPLES VIOLATES
5 FEDERAL LAW. THAT WAS SORT OF HOW I WAS INTERPRETING
6 THE LINE OF CROSS. AND I JUST WANT TO MAKE CLEAR THAT
7 THERE IS NO FEDERAL LAW OR REGULATION THAT REQUIRES
8 STATES TO PERMIT FAITH-BASED AGENCIES TO DICTATE THE
9 TERMS OF GOVERNMENT SERVICES PROVIDED. INDEED, THE
10 FEDERAL STATUTE THAT REQUIRES EQUAL TREATMENT OF
11 FAITH-BASED SERVICE PROVIDERS THAT PARTICIPATE IN
12 PROVIDING SERVICES AND GOVERNMENT PROGRAMS.
13 SPECIFICALLY, I AM GOING TO READ THE LANGUAGE FROM THAT
14 BECAUSE IT MAKES QUITE CLEAR THAT IT DOES NOT ALLOW THIS
15 OR REQUIRE IT. IT SAYS HERE -- AND THIS IS 42 USC
16 290KK-1. RELIGIOUS ORGANIZATIONS ARE ELIGIBLE TO BE
17 PROGRAM PARTICIPANTS ON THE SAME BASIS AS ANY OTHER
18 NONPROFIT PRIVATE ORGANIZATION AS LONG AS THE PROGRAMS
19 ARE IMPLEMENTED CONSISTENT WITH THE ESTABLISHMENT CLAUSE
20 AND THE FREE EXERCISE CLAUSE OF THE FIRST AMENDMENT TO
21 THE UNITED STATES CONSTITUTION.

22 AND THIS IS -- I WANT TO CALL THE COURT'S
23 ATTENTION TO THE NEXT LINE. NOTHING IN THIS CHAPTER
24 SHALL BE CONSTRUED TO RESTRICT THE ABILITY OF THE
25 FEDERAL GOVERNMENT OR A STATE OR LOCAL GOVERNMENT IN

1 RECEIVING FUNDS UNDER SUCH PROGRAMS TO APPLY TO
2 RELIGIOUS ORGANIZATIONS. THE SAME ELIGIBILITY
3 CONDITIONS IN DESIGNATED PROGRAMS THAT ARE APPLIED TO
4 ANY OTHER NONPROFIT PRIVATE ORGANIZATION. IN OTHER
5 WORDS, WHEN RELIGIOUS ORGANIZATIONS ENTER INTO
6 GOVERNMENT CONTRACTS, THE GOVERNMENT IS NOT REQUIRED TO
7 TAILOR THEIR CONTRACT OR THEIR SERVICES TO MEET THE
8 RELIGIOUS NEEDS OF THE AGENCY.

9 AGAIN, I JUST WANT TO -- ACTUALLY, YOU
10 KNOW WHAT, I AM GOING TO STOP THERE BECAUSE I HAVE BEEN
11 SPEAKING LONG ENOUGH AND JUST SEE IF THE COURT HAS ANY
12 QUESTIONS FOR ME.

13 THE COURT: I HAVE NO QUESTIONS.

14 MS. COOPER: THANK YOU.

15 THE COURT: THANK YOU.

16 MR. RIENZI: LET ME START WHERE THE
17 PARTIES AND THE AMICUS AGREE, KIDS ARE NOT WIDGETS.
18 THAT'S GREAT, WE AGREE. KIDS SHOULD BE PLACED IN HOMES
19 THAT SERVE THEIR BEST INTEREST. EVERYBODY AGREES. I
20 THINK EVERYBODY ACTUALLY SAID A VERSION OF THIS ONE, AS
21 MANY DIFFERENT KINDS OF FOSTER FAMILIES AS POSSIBLE IS
22 GOOD FOR KIDS. WE AGREE. THE QUESTION IS, ARE YOU
23 GOING TO GET THERE IF YOU HAVE A GOVERNMENT-IMPOSED
24 LITMUS TEST THAT SAYS PEOPLE -- ORGANIZATIONS WITH
25 CERTAIN RELIGIOUS BELIEFS CAN'T PARTICIPATE IN THE

1 SYSTEM, RIGHT. SO THE ALTERNATIVE -- I THOUGHT IT WAS
2 FASCINATING, THE ACLU IS TALKING ABOUT WELL, CATHOLIC
3 SEEMS LIKE A GOOD AGENCY. WE OUGHT TO MAKE THAT
4 AVAILABLE FOR EVERYBODY.

5 THAT'S NOT SOMETHING THAT IS ON THE TABLE
6 IN THE CASE. WHAT IS ON THE TABLE IN THE CASE IS, ARE
7 THEY GOING TO GET SHUT DOWN OR NOT, RIGHT? SO THE
8 ACLU'S REQUESTED RELIEF IS NOT EXPAND CATHOLIC, THAT'S
9 NOT SOMETHING THE GOVERNMENT CAN DO. IT IS SHUT DOWN
10 CATHOLIC BECAUSE CATHOLIC SHOULD NOT BE AVAILABLE TO
11 ANYBODY, RIGHT. SO I THOUGHT COMMISSIONER FIGUEROA
12 ACTUALLY SAID IT BEST, WHETHER CATHOLIC WINS THE CASE OR
13 DOESN'T WIN THE CASE, THERE'S 28 AGENCIES AVAILABLE IN
14 THIS CITY WHO WILL CERTIFY SAME-SEX FAMILIES.

15 COUNSEL FOR THE ACLU TALKED A LOT ABOUT
16 ESTABLISHMENT CLAUSE CONCERNS, ABOUT WHAT HAPPENS WHEN
17 THE GOVERNMENT DELEGATES ITS FUNCTIONS TO A RELIGIOUS
18 ENTITY. HERE IS WHY THAT ARGUMENT MISSES THE MARK IN
19 THIS CASE. CERTIFICATIONS OF FAMILIES FOR FOSTER CARE
20 ARE NOT THE CITY'S FUNCTION TO DELEGATE. IT'S JUST NOT
21 THE CITY'S FUNCTION. COMMISSIONER FIGUEROA SAID THAT,
22 THEIR DOCUMENTS SAY THAT. THEIR DOCUMENTS ALSO MAKE
23 CLEAR THAT IN NO WAY IS CATHOLIC THE AGENT OF THE CITY.
24 THOSE ARE THE TERMS OF THE CONTRACT. SO IT'S NOT THE
25 CITY'S FUNCTION TO DELEGATE.

1 AND THEY CAN'T BE VIOLATING THE
2 ESTABLISHMENT CLAUSE SIMPLY BY ALLOWING CATHOLIC TO DO
3 WHAT CATHOLIC HAS DONE LONG BEFORE THE CITY WAS INVOLVED
4 IN THIS LINE OF WORK, WHICH IS CATHOLIC BRINGS IN
5 FAMILIES THAT CATHOLIC BRINGS TO THE TABLE AND THINKS
6 ARE GOOD TO BRING TO THE TABLE. IF WE WANT A WORLD
7 WHERE WE HAVE AS MANY FOSTER FAMILIES AS POSSIBLE,
8 ANOTHER THING I THINK EVERYBODY HAS SAID TODAY, WANT AS
9 MANY FOSTER FAMILIES AS POSSIBLE, WELL, DIFFERENT GROUPS
10 CAN REACH DIFFERENT COMMUNITIES BETTER. AND SAYING THAT
11 WE ARE GOING TO SHUT THE DOOR AND WE ARE GOING TO SAY
12 CATHOLIC CAN'T DO IT BECAUSE CATHOLIC DOESN'T SAY THEY
13 ARE IN FAVOR OF EACH AND EVERY FAMILY MAKES NO SENSE.
14 IT'S CONTRARY TO THE INTEREST THAT CITY SAYS IT IS
15 PURSUING.

16 THERE WAS A REFERENCE TO THE ALLIANCE FOR
17 AN OPEN SOCIETY CASE, AOC V. AID, WHICH TALKED ABOUT HOW
18 THE GOVERNMENT IS NOT PERMITTED TO REQUIRE SPEECH
19 OUTSIDE OF WHAT IT'S CONTRACTING FOR. WHEN IT'S PAYING
20 FOR SOMETHING, THE GOVERNMENT IS ALLOWED TO SAY, HEY, I
21 PAID YOU FOR THAT, SAY IT MY WAY. WHEN IT'S NOT PAYING
22 FOR SOMETHING, THEY DON'T GET TO USE THE FACT THAT THEY
23 ARE PAYING YOU OVER HERE TO MAKE YOU ENGAGE IN SPEECH
24 OVER THERE.

25 THAT'S PRECISELY WHAT IS GOING ON HERE.

1 THEY DON'T PAY ANYBODY A PENNY FOR HOME STUDIES. AND
2 THEY CERTAINLY DON'T PAY ANYBODY A PENNY WHO STEPS ASIDE
3 FROM HOME STUDIES. YOU DON'T DRAW A CHECK FROM THE
4 GOVERNMENT WHEN YOU SAY, ACTUALLY I CAN'T DO THAT ONE.
5 SO THEY DON'T PAY A PENNY, IT'S OUTSIDE OF WHAT THEY ARE
6 PAYING FOR. AOC ACTUALLY QUITE CLEARLY DICTATES THAT
7 THE PLAINTIFFS HAVE A VALID COMPELLED SPEECH CLAIM.

8 THERE WERE ARGUMENTS ABOUT THIRD PARTY
9 HARMS AND HOW THE CLAIM BASED ON THE THORNTON CASE THAT
10 WHERE THERE ARE THIRD PARTY HARMS THE RELIGIOUS PARTY
11 HAS TO LOSE BECAUSE THE ESTABLISHMENT CLAUSE SAYS SO.
12 HERE IS THE EASY WAY TO KNOW THAT THAT'S NOT RIGHT.
13 HOSANNA TABOR V. EEOC, A NINE-NOTHING DECISION FROM THE
14 SUPREME COURT ON BOTH FREE EXERCISE AND ESTABLISHMENT
15 CLAUSE GROUNDS SAYING THAT THE GOVERNMENT COULD NOT
16 APPLY AN OTHERWISE VALID NONDISCRIMINATION LAW,
17 DISCRIMINATION AGAINST THE DISABLED. THE GOVERNMENT
18 COULD NOT APPLY THAT OTHERWISE VALID NONDISCRIMINATION
19 LAW AGAINST A CHURCH, A CHURCH SCHOOL. HOBBY LOBBY ALSO
20 REJECTS THE ARGUMENT THAT ANY BURDEN ON THIRD PARTIES
21 CREATES AN ESTABLISHMENT CLAUSE PROBLEM.

22 AND IF WE NEEDED ANYTHING FRESHER, WE
23 COULD JUST GO BACK TO MASTERPIECE FROM FIVE MINUTES AGO,
24 RIGHT, OR TWO WEEKS AGO. HERE IS THE SUPREME COURT, THE
25 SEVEN JUSTICES IN THE MAJORITY, AND THIS IS NOT WHEN

1 THEY ARE TALKING ABOUT -- NOT WHEN THEY ARE TALKING
2 ABOUT THE COMMISSION, THEY ARE JUST TALKING GENERALLY.
3 WHEN IT COMES TO WEDDINGS, IT CAN BE ASSUMED THAT A
4 MEMBER OF THE CLERGY WHO OBJECTS TO GAY MARRIAGE ON
5 MORAL AND RELIGIOUS GROUNDS COULD NOT BE COMPELLED TO
6 PERFORM THE CEREMONY WITHOUT DENIAL OF HIS OR HER RIGHT
7 TO THE FREE EXERCISE OF RELIGION. THAT WAS THE EASY
8 CASE ACCORDING TO SEVEN JUSTICES EARLIER THIS MONTH.
9 IT'S JUST LIKE THIS CASE. MARRIAGE IS BOTH A RELIGIOUS
10 EVENT AND ALSO A CIVIL CONTRACT. YOU HAVE TO GET A
11 GOVERNMENT LICENSE TO GET MARRIED. THE GOVERNMENT
12 REGULATES MARRIAGE. IN SOME WAYS IT'S A GOVERNMENT
13 FUNCTION.

14 IF THE ARGUMENTS FROM THE ACLU AND THE
15 CITY WERE CORRECT, THEN THE SUPREME COURT HAS TO BE
16 WRONG, BECAUSE THEN YOU CAN'T HAVE THE GOVERNMENT
17 ALLOWING RELIGIOUS GROUPS TO HAVE THEIR DIFFERENT
18 RELIGIOUS BELIEFS ON SOMETHING LIKE SEX AND MARRIAGE
19 WHILE STILL DOING STUFF THAT SOMEHOW INVOLVES THE
20 GOVERNMENT. YET THE COURT SAID IT WAS EASY BECAUSE IT
21 IS EASY. BECAUSE OUR LAWS DO NOT GIVE THE GOVERNMENT
22 THE ABILITY TO DICTATE THE ONE AND ONLY CORRECT ANSWER
23 TO COMPLICATED QUESTIONS LIKE SEX AND MARRIAGE. IT'S A
24 FREE COUNTRY, PEOPLE HAVE LOTS OF DIFFERENT BELIEFS.
25 THE SUPREME COURT REPEATEDLY -- THEY SAID IT IN

1 OBERGEFELL, THEY SAID IT AGAIN IN MASTERPIECE, HAS MADE
2 CLEAR THAT WE NEED TO BE ABLE TO LIVE TOGETHER WITH A
3 DIVERSITY OF DIFFERENT BELIEFS AND THAT THE GOVERNMENT
4 CAN'T BE IN THE POSITION OF PUNISHING THE QUOTE UNQUOTE
5 WRONG SET OF BELIEFS.

6 THERE WAS A LOT OF TALK ABOUT THE HARM
7 THAT WOULD OCCUR, THE STIGMA, I THINK WAS MENTIONED A
8 FEW TIMES, THE HARM AND THE STIGMA THAT WOULD OCCUR IF
9 THE GOVERNMENT WERE TO ALLOW CATHOLIC TO CONTINUE
10 OPERATING ACCORDING TO ITS RELIGIOUS BELIEFS. FIRST,
11 AGAIN, THAT'S NOT A WINNING CONSTITUTIONAL ARGUMENT,
12 SAYS MASTERPIECE, RIGHT. IF THAT WERE A WINNING
13 CONSTITUTIONAL ARGUMENT, SEVEN JUSTICES COULD NOT SAY
14 THAT THE CHURCH CAN SAY THEY WON'T DO GAY WEDDINGS,
15 BECAUSE THEN THE GOVERNMENT WOULD BE ALLOWING A STIGMA
16 IN A GOVERNMENT FUNCTION. THAT'S NOT WHAT THE LAW IS.
17 IT'S NOT WHAT THE LAW IS.

18 BUT WE HEARD A LOT FROM THE CITY OVER THE
19 PAST FEW DAYS ABOUT ALL OF THE EXCEPTIONS THEY HAVE
20 GRANTED, ALL THE KIDS WHO THEY HAVE GONE AHEAD AND
21 PLACED IN FAMILIES THROUGH CATHOLIC. AND I WOULD ASK,
22 IF THEY HAVE SUCH A COMPELLING INTEREST, IF IT'S SUCH A
23 COMPELLING IMPORTANT INTEREST TO NOT WORK WITH CATHOLIC,
24 WELL THEN, WHY ARE THEY MAKING ALL OF THESE EXCEPTIONS?
25 AND IF THE EXCEPTIONS ARE SO HARMFUL, IF IT'S SO

1 TERRIBLE FOR PEOPLE TO LIVE IN A WORLD WHERE WE DON'T
2 ALL AGREE ABOUT RELIGION AND SEX AND MARRIAGE, THEN HOW
3 COME PEOPLE HAVE NOT SUFFERED FROM THOSE EXCEPTIONS?

4 ANSWER, THEY HAVE NOT SUFFERED. THEY ARE
5 ACTUALLY NOT HARMFUL. PEOPLE DISAGREE. I STRONGLY
6 SUSPECT THAT A LOT OF THESE COUPLES HAVE DEEP
7 DISAGREEMENTS WITH THE CATHOLIC CHURCH. AND IN AMERICA,
8 THAT'S OKAY. IT'S OKAY FOR THE CATHOLICS TO SAY I
9 DISAGREE WITH THE SAME-SEX COUPLE OVER THERE AND I THINK
10 -- YOU KNOW, MY RELIGION SAYS YOU SHOULD DO IT
11 DIFFERENTLY. IT'S OKAY FOR A LOT OF OTHER PEOPLE,
12 INCLUDING COMMISSIONER FIGUEROA, TO HAVE DEEPLY-HELD
13 BELIEFS THAT THE CATHOLIC CHURCH IS DEAD WRONG. IN A
14 FREE COUNTRY THAT'S FINE. AND IN A FREE COUNTRY THAT
15 SHOULD NOT BE DISQUALIFYING FOR EITHER GROUP AND FOR
16 EITHER SIDE TO PARTICIPATE IN THE PUBLIC SPIRIT,
17 PARTICULARLY TO DO SOMETHING THAT CATHOLIC IS PROVEN TO
18 DO VERY WELL, WHICH IS HELP KIDS.

19 YOU HEARD ARGUMENT AGAIN ABOUT THE HARMS
20 THAT WOULD OCCUR, AND I WOULD JUST REMIND THE COURT
21 AGAIN, THERE IS NO EVIDENCE THAT ANYONE HAS EVEN ASKED
22 FOR THE SERVICE. THERE IS NO EVIDENCE THAT ANYBODY HAS
23 -- UNDER THE SUPREME COURT'S CASE BROWN V. ENTERTAINMENT
24 MERCHANTS ASSOCIATION, THE GOVERNMENT IS NOT ALLOWED TO
25 RELY ON AMBIGUOUS PROOF TO CARRY ITS COMPELLING INTEREST

1 BURDEN. IT ACTUALLY NEEDS TO HAVE REAL PROOF OF ACTUAL
2 HARM.

3 AND I WAS DISAPPOINTED BEFORE WHEN WE
4 SUDDENLY HAD A SURPRISE EXPERT WITNESS, BUT THE SURPRISE
5 EXPERT WITNESS ENDED UP, TO HIS CREDIT, QUITE TRUTHFULLY
6 SAYING, I DON'T KNOW, IT MIGHT BE HARMFUL. I THINK IT'S
7 HARMFUL, BUT I DON'T REALLY KNOW. AND UNDER THE LAW,
8 THE GOVERNMENT LOSES AT THAT POINT. UNDER THE LAW, THEY
9 HAVE NOT CARRIED THEIR BURDEN WHEN THE ANSWER IS, I
10 DON'T KNOW, I THINK SO BUT I CAN'T PROVE IT. THAT MEANS
11 GOVERNMENT LOSES.

12 THERE WAS SOME DISCUSSION ABOUT THE
13 CONTRACT AND THE PUBLIC ACCOMMODATIONS LANGUAGE IN THE
14 CONTRACT. I WOULD POINT OUT AGAIN, THE GOVERNMENT
15 SIMPLY DECLINED TO BRIEF THE QUESTION OF WHETHER THIS IS
16 A PUBLIC ACCOMMODATION. THEY SEEM TO KEEP ASSUMING IT
17 IS A PUBLIC ACCOMMODATION IN PART BECAUSE THE WORDS
18 "PUBLIC ACCOMMODATION" APPEAR IN THE CONTRACT. I WOULD
19 SIMPLY POINT OUT THAT THAT PARAGRAPH MAKES CLEAR THAT
20 IT'S ABOUT A LOT OF DIFFERENT THINGS. IT TALKS ABOUT
21 RESIDENTIAL AND REAL PROPERTY. THERE'S ANOTHER
22 PARAGRAPH LATER IN SECTION 15 THAT TALKS ABOUT NOT
23 GIVING THE GOVERNMENT GOODS THAT COME FROM NORTHERN
24 IRELAND. THAT'S NOT BECAUSE THERE IS GOODS GOING ON IN
25 THIS CONTRACT. THERE IS NO GOODS GOING ON IN THIS

1 CONTRACT. THAT'S BECAUSE THIS BOILERPLATE THAT APPEARS
2 IN A MILLION CITY CONTRACTS, THAT'S WHY IT'S THIS THICK,
3 IT DOES NOT PROVE THAT IT'S A PUBLIC ACCOMMODATION. AND
4 AGAIN, I WOULD JUST SAY THE CITY'S OWN ACTIONS AND THE
5 WAY FOSTER CARE IS DONE PROVE CONCLUSIVELY THAT IS NOT A
6 PUBLIC ACCOMMODATION, IT WAS NEVER INTENDED TO BE ONE.
7 THEY JUST NEEDED TO COME UP WITH AN ARGUMENT.

8 THE CITY SPOKE ABOUT CONTRACT RENEWAL AND
9 SAID, WELL, THIS IS JUST A MATTER OF NOT RENEWING A
10 CONTRACT. I WOULD SIMPLY POINT OUT THE GOVERNMENT DOES
11 NOT GET TO STOP BEING THE GOVERNMENT BECAUSE THERE IS A
12 CONTRACT INVOLVED. THE LAW IS ACTUALLY QUITE CLEAR THAT
13 PEOPLE CONTRACTING WITH THE GOVERNMENT STILL HAVE THEIR
14 FIRST AMENDMENT RIGHTS. THEY HAVE THE SAME FIRST
15 AMENDMENT RIGHTS THAT AT-WILL EMPLOYEES OF THE
16 GOVERNMENT HAVE. THAT'S CLEAR 3RD CIRCUIT LAW. SO THE
17 GOVERNMENT DOES NOT JUST GET TO SAY, WELL, IT'S A
18 CONTRACT, I DON'T HAVE TO WORRY ABOUT RESPECTING YOUR
19 RELIGION OR I DON'T HAVE TO WORRY ABOUT NOT FORCING YOU
20 TO SPEAK BECAUSE IT'S A CONTRACT. BECAUSE IT'S A
21 CONTRACT IS NOT A FIRST AMENDMENT DEFENSE.

22 THE CITY, ACTUALLY, AS I UNDERSTOOD IT,
23 WAS ALSO ARGUING THAT MAYBE CATHOLIC IS WRONG ABOUT ITS
24 RELIGIOUS REQUIREMENTS. MAYBE THEY ARE WRONG WHEN THEY
25 THINK THAT GOD DOES NOT WANT THEM TO FILL OUT THE

1 PAPERWORK AND CERTIFY THESE COUPLES. AND I WOULD SIMPLY
2 SAY IT IS NOT FOR THE GOVERNMENT, NOR RESPECTFULLY FOR
3 THE COURT, TO DECIDE WHAT CATHOLIC'S RELIGIOUS EXERCISE
4 IS. THAT IS THEIR SINCERE RELIGIOUS EXERCISE. THERE IS
5 NO SERIOUS CHALLENGE TO IT IN THE EVIDENCE. THAT'S
6 THEIR RELIGIOUS EXERCISE. MAYBE THE CITY THINKS THEY
7 ARE WRONG, BUT THE BOTTOM LINE IS THEIR SINCERE
8 RELIGIOUS EXERCISE IS, I CAN'T SIGN THE FORM, I CAN'T DO
9 THAT THING. IT IS NOT FOR THE CITY TO COME BACK AND TRY
10 TO REDEFINE IT AND SAY, WE THINK YOU ARE WRONG. THAT IS
11 JUST AS INAPPROPRIATE AS THE POPE FRANCIS DISCUSSION AT
12 DHS. THAT'S FOR THE RELIGIOUS PEOPLE TO DECIDE, IT'S
13 NOT FOR THE GOVERNMENT TO DECIDE.

14 LET ME END ON THE BALANCE OF HARMS ISSUE
15 THAT HAS BEEN DISCUSSED. IT'S NOW REALLY CLEAR BECAUSE
16 NOW WHEN -- I MEAN WE HAVE ACTUALLY HEARD FROM THE
17 INTERVENOR ON THE WITNESS STAND, WE HAVE HEARD FROM
18 INTERVENOR'S COUNSEL, WE'VE HEARD FROM THE CITY, THEY
19 CAN'T FIND ANYBODY WHO WAS HARMED BY THE OLD SYSTEM,
20 ZERO, THEY CAN'T FIND A SOUL. THAT OLD SYSTEM SO FAR AS
21 WE ARE AWARE AND SO FAR AS THE EVIDENCE SHOWS, HURT NO
22 ONE, NOT A SINGLE GAY COUPLE THAT COULDN'T GO BE A
23 FOSTER PARENT IF THEY WANTED TO. NOT A SINGLE GAY
24 COUPLE ACTUALLY TURNED AWAY BY CATHOLIC. THERE IS JUST
25 NO EVIDENCE OF A SOUL WHO WAS HARMED. AND SO AS

1 COMMISSIONER FIGUEROA SAID, YOU HAVE GOT THE SAME NUMBER
2 OF AGENCIES AVAILABLE EITHER WAY.

3 SO YOU HAVE GOT THIS HYPOTHETICAL CLAIM
4 THAT SOMEBODY MIGHT BE INJURED, ALTHOUGH WE DON'T KNOW
5 WHO AND WE HAVE GOT NO PROOF OF IT. BUT THAT'S THE
6 GOVERNMENT'S ARGUMENT AGAINST THE STATUS QUO. BUT IN
7 ORDER TO VINDICATE THAT ALLEGED INTEREST, THEY ARE
8 WILLING TO DO REAL HARM TO REAL ACTUAL PEOPLE, BOTH THE
9 AGENCY AND THE PARENTS AND THE KIDS. THEY ACKNOWLEDGE
10 WE HAVE SOME OPEN CATHOLIC HOMES. WELL, THAT'S NOT JUST
11 WORDS, RIGHT. SOME OPEN CATHOLIC HOMES IS BEDS AND
12 FAMILIES WHERE FOSTER KIDS SHOULD BE SLEEPING RIGHT NOW.
13 AND THE GOVERNMENT IS NOT LETTING THEM SLEEP THERE.

14 YOU HEARD FROM COMMISSIONER FIGUEROA THAT
15 JUST LIKE THEY DID IN MARCH, THEY HAVE STILL HAVE GOT
16 700 PLUS KIDS IN CONGREGATE CARE, AND AS SHE TOLD THAT
17 REPORTER, ABOUT 250 OF THEM COULD BE LIVING IN FAMILIES.
18 THAT NUMBER HAS NOT MOVED AN INCH IN THE PAST THREE
19 MONTHS. DO YOU THINK THERE IS ANY SERIOUS WORLD IN
20 WHICH THE OPENING UP OF THOSE 26 BEDS AT CATHOLIC HOMES
21 DOESN'T MOVE SOME REAL LIVE KIDS TO GET INTO FOSTER
22 HOMES? OF COURSE IT DOES.

23 THE GOVERNMENT TALKED ABOUT THEIR
24 EXCEPTIONS POLICY. AND WE HEARD SOME TESTIMONY. NO ONE
25 HAS CLOSED ON IT AND I WILL NOT EITHER, OTHER THAN TO

1 MAKE THIS OBSERVATION. WE HEARD SOME TESTIMONY ABOUT
2 DOE CHILD NUMBER 1, AND IF ONE THING IS CLEAR, I AM
3 SURE, YOUR HONOR, IS THAT IT WAS A COMPLICATED MESS.
4 THERE'S A COMPLICATED MESS OVER THAT CHILD. BUT THAT'S
5 INSTRUCTIVE, BECAUSE THAT SHOWS THAT WHEN YOU ARE IN A
6 WORLD WHERE YOU CAN'T JUST PROCEED NORMALLY AND YOU HAVE
7 TO GO GET SPECIAL EXCEPTIONS FROM THE TOP OF THE TOP,
8 RIGHT, FROM THE TOP LEVELS OF CITY GOVERNMENT, I BELIEVE
9 WAS THE PHRASE. YOU HAVE TO GO GET EXCEPTIONS AT THE
10 TOP. AND WHEN YOU DON'T HAVE A WRITTEN POLICY AND YOU
11 HAVE NOT TOLD EVERYBODY AT THE BOTTOM, IT'S RIDICULOUS
12 TO ASSUME THAT YOU ARE FINDING OUT ABOUT ALL THE KIDS
13 WHO NEED TO BE PLACED IN ALL THE RIGHT PLACES. THERE IS
14 JUST NO REASON TO ASSUME THAT.

15 SO THE CURRENT SITUATION THAT IS GOING ON
16 RIGHT NOW WITH THE ILLEGAL FREEZE OF INTAKES HURTS REAL
17 PEOPLE, REAL KIDS, REAL FOSTER PARENTS, REAL AGENCIES.
18 AND THAT'S HARM THAT SHOULD BE STOPPED. AND THE IDEA
19 THAT OUT OF OUR DESIRE TO MAKE SURE THAT EVERYONE GETS
20 TO USE THE AGENCY THEY WANT, WE ARE GOING TO GO TO
21 PEOPLE WHO HAVE DELIBERATELY CHOSEN CATHOLIC, WHO LOVE
22 CATHOLIC, WHO HAVE BEEN WITH CATHOLIC DECADES, AND WE
23 ARE GOING TO SAY, SORRY, YOU CAN'T HAVE CATHOLIC ANY
24 MORE. AND WE ARE GOING TO TAKE THAT AWAY FROM REAL
25 ACTUAL PEOPLE IN ORDER TO VINDICATE THE HYPOTHETICAL

1 SITUATION THAT HAS NOT ACTUALLY ARISEN YET THAT SOMEBODY
2 MIGHT SHOW UP TO CATHOLIC AND ASK FOR THE CATHOLIC
3 CHURCH TO COME IN AND EVALUATE THEIR FAMILY LIFE IN THIS
4 CIRCUMSTANCE SIMPLY DOES NOT MAKE ANY SENSE. AND I
5 WOULD END BY POINTING THE COURT TO TWO CASES IN OUR
6 BRIEF, MARKS V. JACKSON AND REILLY V. CITY OF
7 HARRISBURG. WHAT THEY BOTH SAY IS THAT THE IRREPARABLE
8 HARM AND BALANCE OF HARM SHOWINGS, THAT'S A SLIDING
9 SCALES, I AM SURE YOUR HONOR IS AWARE FROM THE
10 PRELIMINARY INJUNCTION FACTOR ANALYSIS, BUT THAT A
11 STRONG SHOWING ON IRREPARABLE HARM AND BALANCE OF HARMS
12 CAN EVEN LESSEN WHAT A PARTY NEEDS TO DO ON SUCCESS ON
13 THE MERITS. FOR THE REASONS WE HAVE SAID, WE THINK
14 ACTUALLY SUCCESS ON THE MERITS IS QUITE CLEAR. WE THINK
15 WHAT THE GOVERNMENT IS DOING VIOLATES STATE AND FEDERAL
16 LAW, FEDERAL LAW, BOTH FIRST AMENDMENT AND RELATED TO
17 THEIR FUNDING. SO WE THINK THE MERITS ARE ACTUALLY
18 QUITE STRAIGHTFORWARD, BUT IF YOU HAVE ANY DOUBT, THE
19 HARM ALONE SHOULD BE ABLE TO CARRY THE DAY FOR THE
20 INJUNCTION. SO WITH THAT, WE WOULD ASK YOUR HONOR TO
21 ENTER THE INJUNCTION. THANK YOU.

22 THE COURT: OKAY, THANK YOU. THE COURT
23 HOLDS THE MATTER UNDER ADVISEMENT. HOWEVER, I WOULD
24 REQUEST OF THE PARTIES THAT THEY FILE FINDINGS OF FACTS
25 AND CONCLUSIONS OF LAW BY THE 28TH OF JUNE. AND THE

1 COURT WILL ISSUE ITS RULING SHORTLY THEREAFTER.

2 IS THERE ANYTHING FURTHER?

3 MR. RIENZI: NO, YOUR HONOR.

4 MS. CORTES: NO, YOUR HONOR.

5 THE COURT: OKAY. HAVE A GOOD EVENING.

6 (ALL RISE.)

7

8

9 I CERTIFY THAT THE FOREGOING IS A CORRECT

10 TRANSCRIPT FROM THE RECORD OF PROCEEDINGS IN THE

11 ABOVE-ENTITLED MATTER.

12

13

14

15 DATE

OFFICIAL COURT REPORTER

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LYNN MCCLOSKEY, RPR.

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