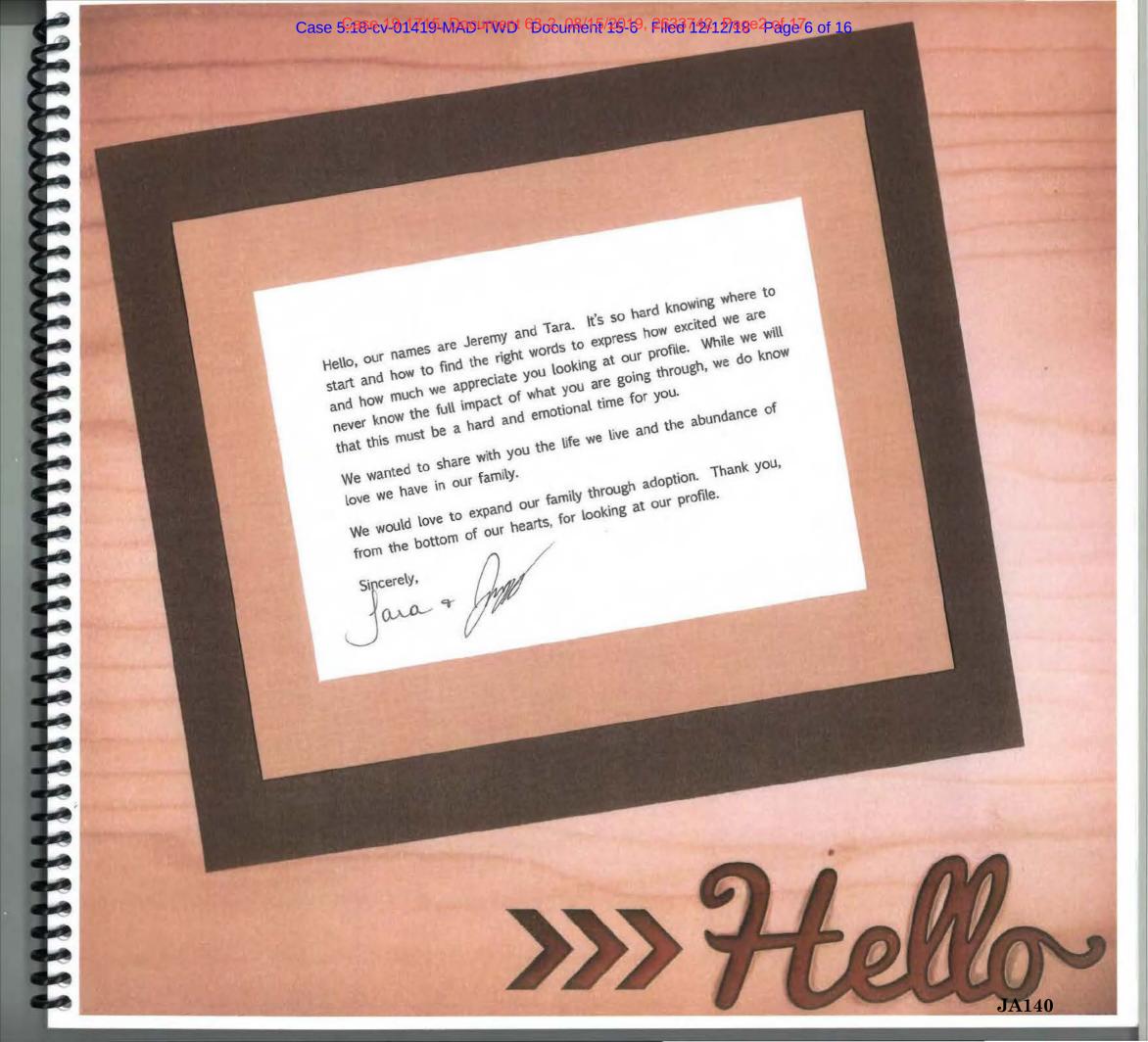
## EXHIBIT

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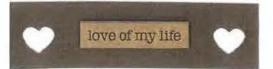


soulmates



We first met each other 9 years ago briefly at a birthday party. It was not until a year and half later that we would meet again when Jeremy started working for the same company that Tara did. While at a company function we started talking and immediately hit it off. We started taking our lunches together and became great friends. We noticed right away that we share the same sense of humor and adore our families. We had been dating for just over a year and knew that we were meant to be together. We were married on August 27, 2011. We have a strong bond and we face every aspect of our lives together.





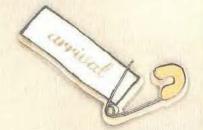


two souls, one heart





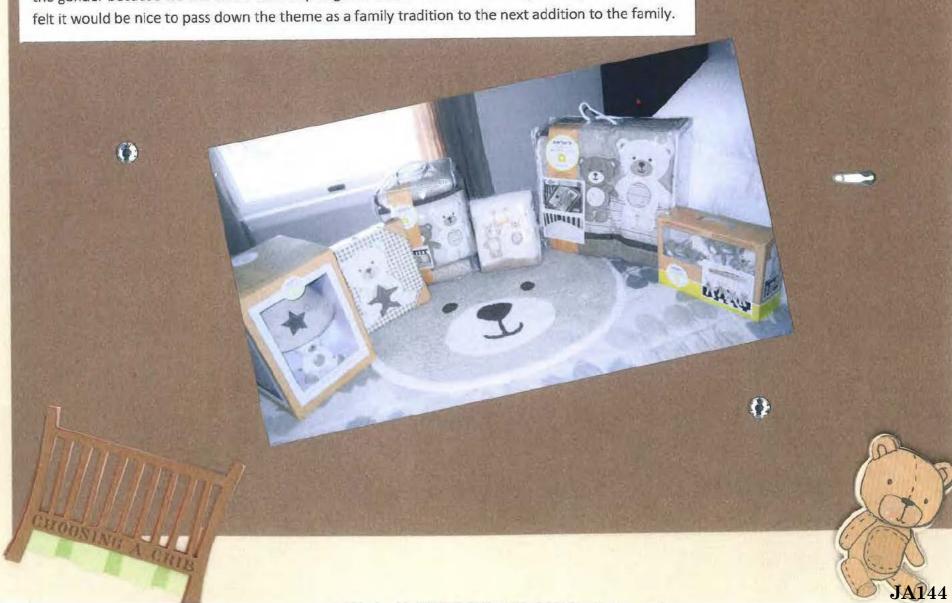
Preparing the nursery



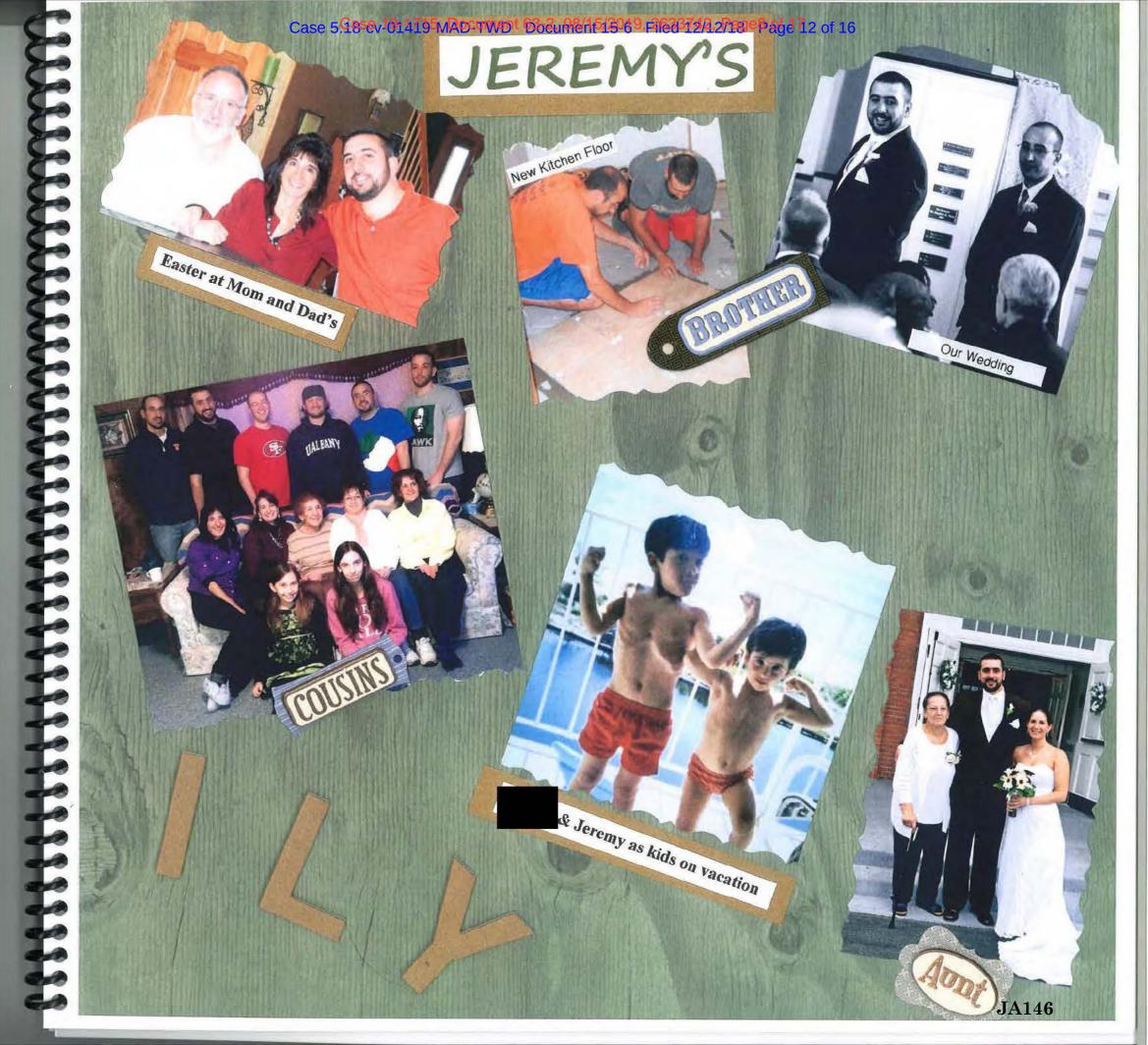
## When the baby comes...

Tara will have maternity leave from work and extended time off. She also has the flexibility to work from home part time when the time is right to go back to work. Jeremy will also have a couple of weeks of time off as well to be home to help welcome home the baby. Both of our mothers will be taking time off to help us adjust and give a helping hand.

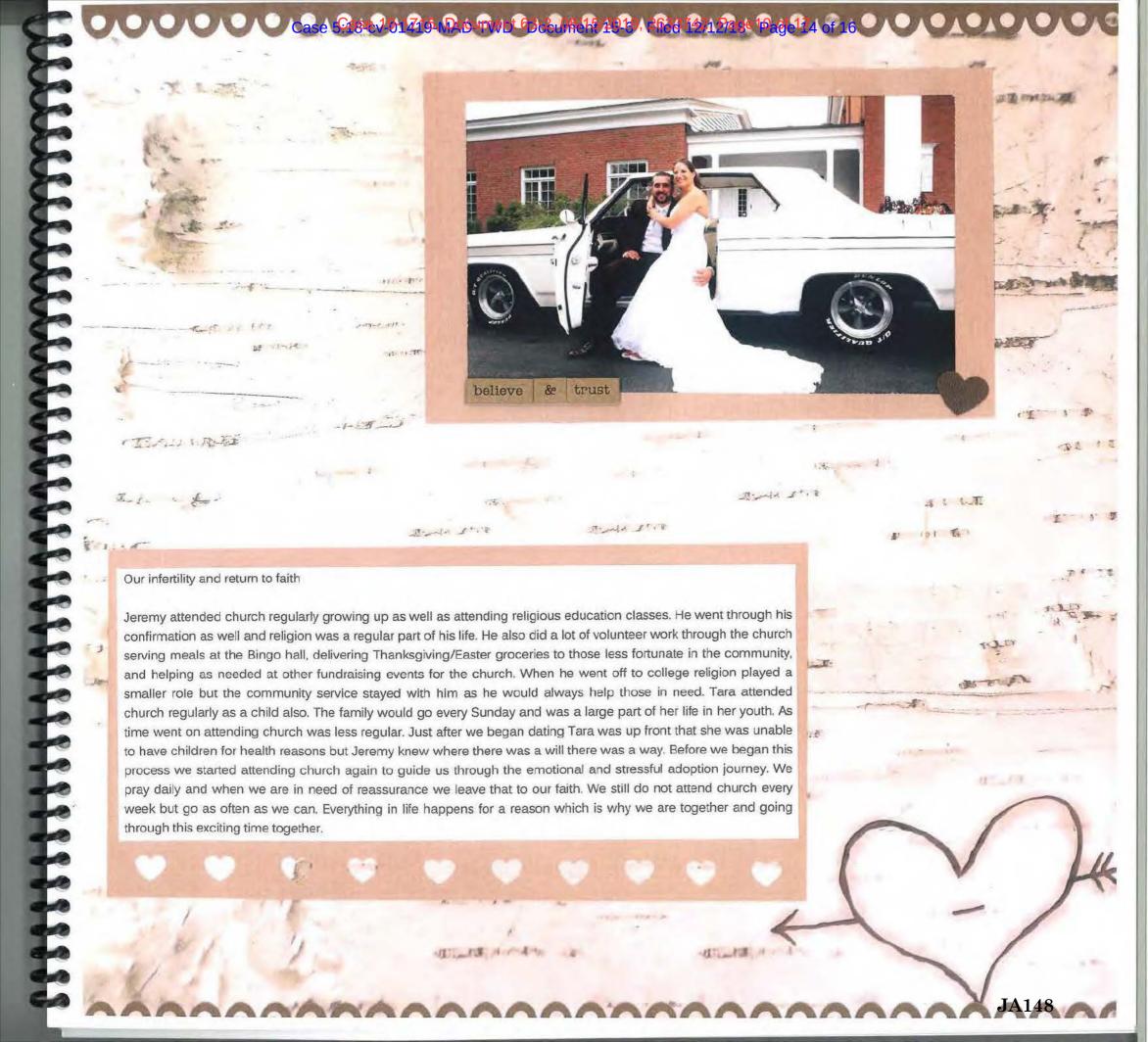
The nursery is set up and waiting. The nursery will be right across the hall from our master bedroom. We will be using the same gender neutral theme as we did for Since we were not specific on the gender because we will love a little boy or girl or both! The theme is Baby Bear by Carter's. We felt it would be nice to pass down the theme as a family tradition to the next addition to the family.













## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

NEW HOPE FAMILY SERVICES, INC.,

Plaintiff.

VS.

SHEILA J. POOLE, in her official capacity as Acting Commissioner for the Office of Children and Family Services for the State of New York. 5:18-CV-1419 (MAD/TWD)

AFFIDAVIT OF JUSTIN BLEUER IN SUPPORT OF NEW HOPE FAMILY SERVICES' MOTION FOR PRELIMINARY INJUNCTION

## Defendant.

- My name is Justin Bleuer.
- I am above the age of 18, of sound mind, and I have personal knowledge of the facts explained in this document.
- I grew up in western New York near Buffalo, the fifth of 14 kids. My parents adopted eleven of my brothers and sisters.
- 4. My parents adopted from all over the world, so I have siblings from the United States, Sierra Leone, Guatemala, Korea, and Liberia. Our friends used to joke that we were a "United Nations family."
- 5. Two of my siblings came to us through New Hope Family Services. That was over 20 years ago, but I still remember how different those adoption experiences were for our family. New Hope incorporated its Christian faith and values at every stage of each adoption. Christian faith was something that was important to my family growing up and remains important to me now that I am an adult and a pastor at a local church. Back then, New Hope's Christian focus made my family eager to work with them.

- 6. It was a blessing for me to grow up with adopted brothers and sisters.
  So I always desired to follow in my parents' footsteps and adopt. I had seen firsthand the positive impact adoption has on a family and the child that is brought into that family. When I met my wife, Annie, I was pleased to find out that she had the same desire to pursue adoption at some point in our marriage.
- 7. Annie and I got married in 2005 and by 2011 we had two kids of our own. Then in 2013 we lost a baby to miscarriage. That sparked something in both Annie and I to start thinking more seriously about adopting.
- 8. When Annie and I began to seriously consider adopting, we knew we wanted to work with New Hope. Through my parents, I had experience with adoption agencies. But I wanted our Christian faith to be an integral part of the process and so we went straight to New Hope.
- 9. At New Hope we found shared Christian values about the family, respect for life and care for orphans. New Hope's approach to adoption was anchored in the Bible. Prayer was included in meetings and at every step of the process. I saw the staff show true Christian love for the people they served both birth parents, and adoptive parents. Staff walked with birth families through tough situations and decisions, while prayerfully preparing adopting families to bring a new child into their home. Everything was focused on Biblical teachings about hope, healing, the value of new life, the dignity of every person, and most importantly the gift of family.

- 10. Staff members told us right away that New Hope's primary goal is not to find children for families, but to serve the babies and mothers they work with to find each child a permanent, loving home that will fit their individual needs and situations.
- 11. New Hope's Christian faith was obvious to us when we adopted our baby girl. New Hope was working with a particular birth mother and our application moved quicker than most because we were willing to adopt a baby from a different race. She selected us to adopt her baby girl. We were thrilled. Then days before the birth, the birth mom decided she wanted an open adoption, rather than the semi-open one we had arranged. New Hope prayerfully walked both families through that process and we settled on an open adoption arrangement that has worked well for both families.
- 12. About the same time that the birth mom chose us to adopt her little girl, we found out that Annie was pregnant again. So in March 2014, we welcomed our then 3-day-old little girl into our home, and in July 2014 we had a baby boy.
- Since then we have had another son, growing our family to five children.
- 14. As part of the process with New Hope, Annie and I created a family album. It was designed to help birth mothers get to know us as they tried to decide whether to place their baby with us. New Hope staff gave us advice about putting this book together and they reviewed and provided suggestions and edits before we

finalized the book. A true and correct copy of excerpts from that book are attached as Exhibit 1.

15. New Hope has continued to provide care for us, our birth mom, and our baby even after the adoption. They facilitated meetings for our family and the birth family. Initially, those meetings were at New Hope. They also facilitate ongoing correspondence between our family and our daughter's birth family. Every few months we send letters and pictures to New Hope and they provide those to our daughter's birth mom and dad. They will continue to do this for us until she is 18. New Hope is able to facilitate these meetings and correspondence so well because of the close relationship we, and our birth mom, have built with the New Hope staff, through the joys and challenges of the adoption process. It would be hard for us and our birth mom to replicate that with another agency.

16. Annie and I are aware of different adoption agencies, including secular ones. We chose to work with New Hope because it is different, the people there share our Christian views about what it means to be family. Because of that, Annie and I are open to adopting again, but we would only want to work with New Hope.

17. Similarly, we would not be comfortable adopting through New Hope if New Hope changed its Christian beliefs. If New Hope changes its religious beliefs about family, it could no longer provide the consistent Christian-based adoption experience that we and the birth mother we worked with enjoyed.

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| I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the |
| foregoing is true and correct to the best of my knowledge.               |
| Executed this 🔁 day of November, 2018, at Green, New York.               |
| Justin Bleuer  |
| STATE OF NEW YORK )  COUNTY OF Chevange )                                |
| On the 30th day of 100000000000000000000000000000000000                  |
| Motary Public State of New York My Commission Expires 5115/4037          |
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