

# **EXHIBIT 7**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

**NEW HOPE FAMILY SERVICES, INC.,**

5:18-CV-1419 (MAD/TWD)

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,

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

Defendant.

1. My name is Justin Bleuer.
2. I am above the age of 18, of sound mind, and I have personal knowledge of the facts explained in this document.
3. 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.

13. 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 30 day of November, 2018, at Greene New York.

  
Justin Bleuer

STATE OF NEW YORK )  
 ) ss.:  
COUNTY OF Chenango )

On the 30<sup>th</sup> day of November, 2018, before me, the undersigned, a Notary Public in and for said state, personally appeared Justin Bleuer, personally known to me or proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his capacity, and that by his signature on the instrument, the person or the entity upon behalf of which the person acted, executed the instrument.

JANETTE S. ZINDLE  
Notary Public, State of New York  
Residing in Chenango County  
My Commission Expires 5/15/2023

  
Notary Public

# EXHIBIT

1







Thank you for reviewing our profile and meeting our family. We are excited to share our love with another child. We commend you for choosing life for your baby. We respect your tremendous courage and are praying for God's wisdom and strength for you!





# Our Family



Justin and Annie 2003

## Justin and Annie's Story

Met at College~August 2001  
Started Dating~February 2003  
Engaged~November 2003  
Married~May 21, 2005



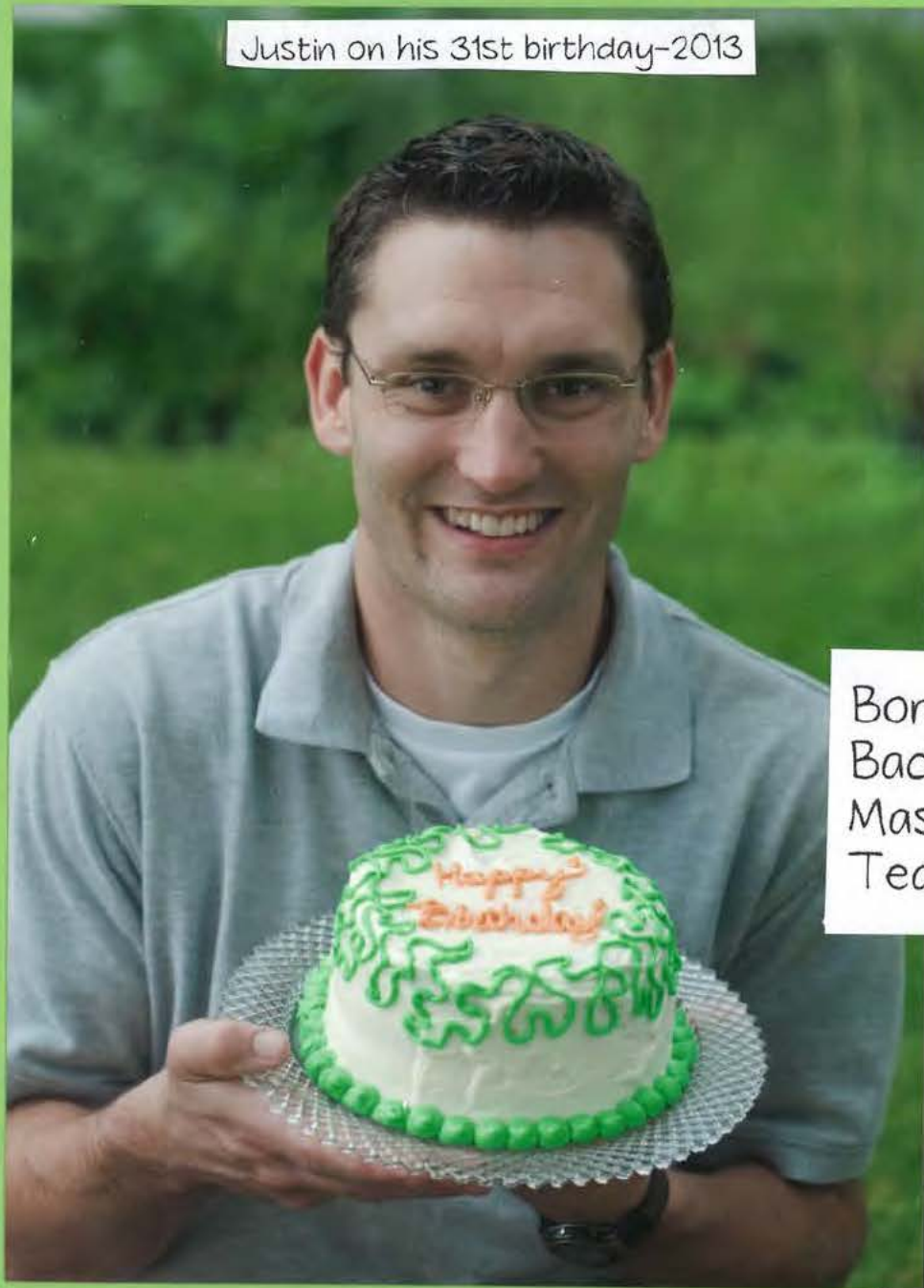
Our Wedding Day~May 21, 2005





# Meet Justin

Justin on his 31st birthday-2013



Making a snowman with [redacted] and [redacted]

Born [redacted]  
Bachelors Degree completed  
Masters Degree almost finished  
Teaching Pastor at Christian Church



We caught a fish!

Justin, age 3, with his siblings.



Preaching on a Sunday morning

Justin likes:  
time with his family  
playing soccer  
eating Skittles  
reading  
remote-control vehicles



# Meet Annie

Born [redacted]  
Two Associates Degrees completed  
Professional Photographer



Annie at age 30~2013



Annie at age 5



Silly faces with [redacted] and [redacted]



Fishing at the lake near our house

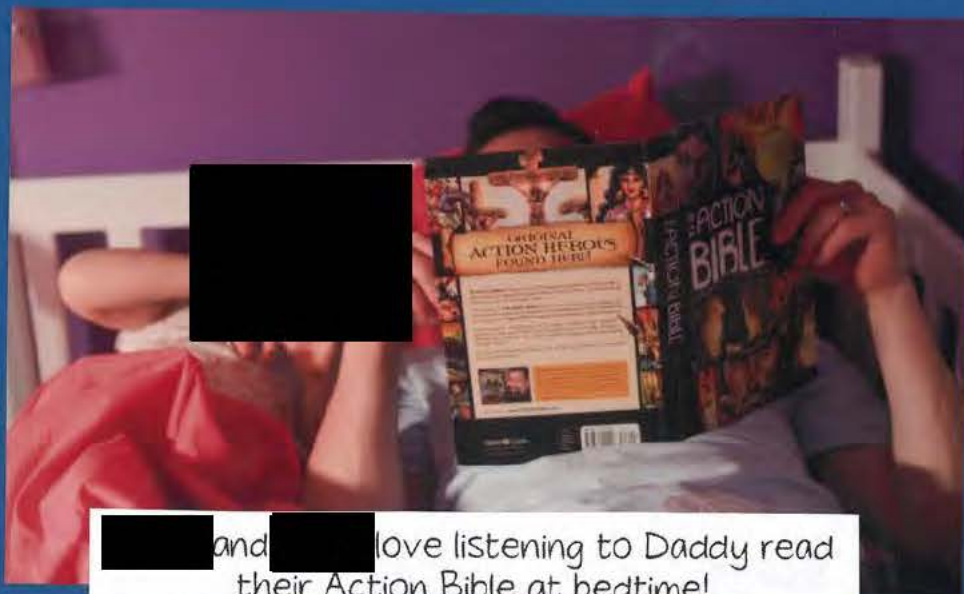
Annie likes:  
time with her family  
photography  
reading  
singing and music  
the color blue  
mashed potatoes  
Hershey's chocolate



Photographing a wedding



# Our Faith



and love listening to Daddy read their Action Bible at bedtime!

## Justin's testimony:

I was four years old when an older sister had an asthma attack. I was so scared for her! I asked my oldest sister where she would go if she died and she explained to me that she'd go to heaven because she had asked Jesus to be her Savior. That very day I also asked Jesus to forgive me, and my life has never been the same. I am so grateful for His forgiveness!

I love serving at our church by teaching, training, and counseling. I love meeting with young couples and helping prepare them for marriage.

## Annie's testimony:

I was about 8 years old when I asked Jesus to forgive my sins and chose to follow Him for the rest of my life. Since then, God has helped me become the person I am today, and I am eternally grateful for His mercy and grace.

I love to serve at our church through singing, managing the library, and supporting Justin as a pastor's wife. I love being able to serve with him!

We feel that God has placed a desire for adoption in both our hearts and that He wants us to provide a safe and loving home for a child of His choosing.

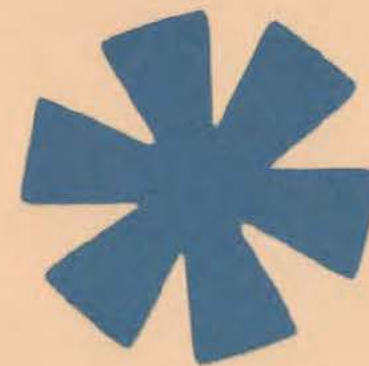


Our church, which is very close to our home!



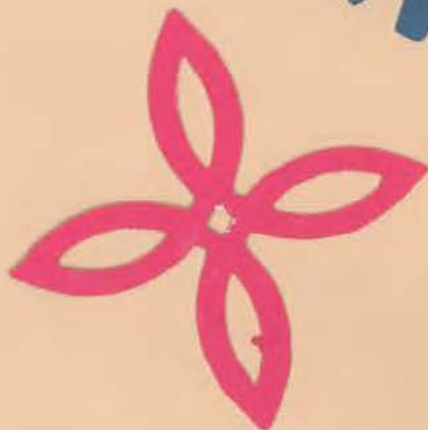
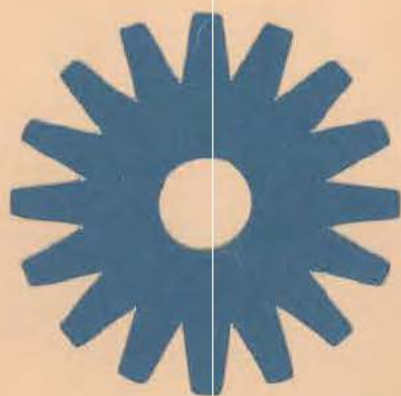


Annie with [redacted] and [redacted]



Justin's words about Annie:

Annie is so beautiful and fun. She's such a kind and thoughtful wife, and is also an excellent Mommy. Our girls adore her, and look forward to her songs and cuddles. She has so much love in her heart and would love to share it with another child.



Justin with [redacted] and [redacted]

Annie's words about Justin:

Justin is a sweet and kind husband, with strong character and a faithful heart. He





Thank you for viewing our profile!  
We hope that you enjoyed meeting  
our family. Please know that we are  
praying for you and thank you for  
choosing life!

Love,

Justin, Annie,

and



