

EXHIBIT 32

From: ccook@lambdalegal.org <ccook@lambdalegal.org>
Sent: Friday, January 22, 2021 11:39 AM
To: Katherine Janson <kjanson@cravath.com>
Cc: Serena Candelaria <scandelaria@cravath.com>; Peter Barbur <PBarbur@cravath.com>; kloewy@lambdalegal.org
Subject: FW: Foster Parent Inquiry

External (ccook@lambdalegal.org)

[Report This Email](#) [FAQ](#)

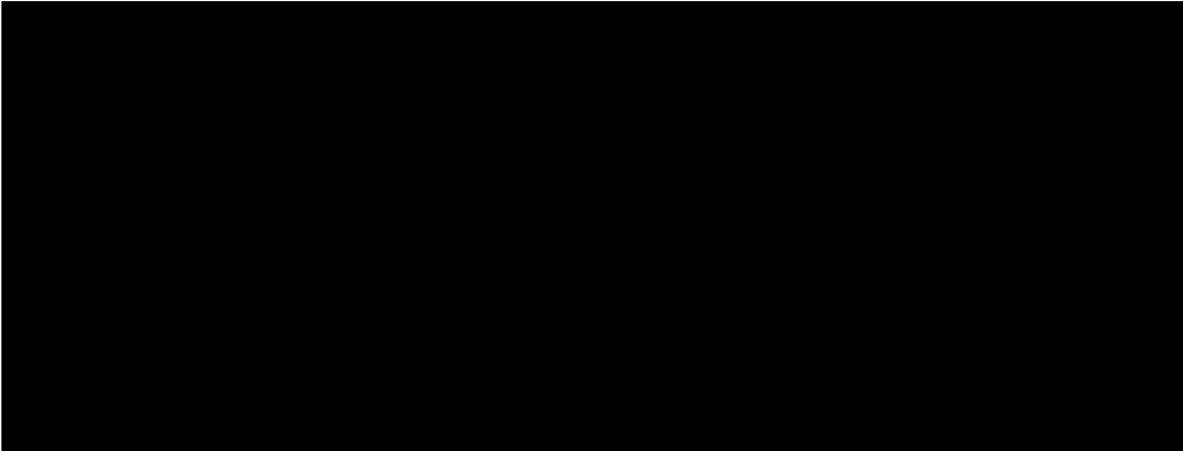


From: Brandy Welch <[REDACTED]>
Sent: Friday, January 22, 2021 11:31 AM
To: Currey Cook <CCook@lambdalegal.org>
Subject: Fwd: Foster Parent Inquiry



Begin forwarded message:

From: CurreyCook <CCook@lambdalegal.org>
Date: May 6, 2019 at 3:29:47 PM EDT
To: Brandy Welch <[REDACTED]>
Cc: Eden ♥ <[REDACTED]>, "lcooper@aclu.org" <lcooper@aclu.org>, Susan Dunn <sdunn@aclusc.org>
Subject: RE: Foster Parent Inquiry



[REDACTED]

From: Brandy Welch [REDACTED]
Sent: Monday, May 6, 2019 8:05 AM
To: Currey Cook <ccook@lambdalegal.org>
Cc: Eden ♥ [REDACTED]; lcooper@aclu.org; Susan Dunn <sdunn@aclusc.org>
Subject: Re: Foster Parent Inquiry

[REDACTED]

[Get Outlook for Android](#)

From: Brandy Welch [REDACTED]
Sent: Wednesday, May 1, 2019 4:10:55 PM
To: Currey Cook
Cc: Eden ♥; lcooper@aclu.org; Susan Dunn
Subject: Re: Foster Parent Inquiry

[REDACTED]

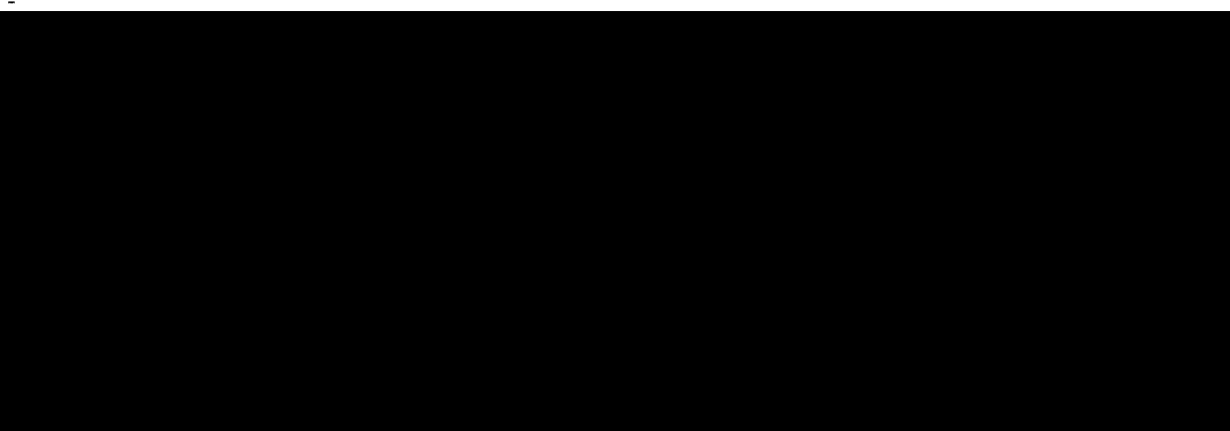
On Wed, May 1, 2019 at 4:05 PM Currey Cook <ccook@lambdalegal.org> wrote:

[REDACTED]

From: Brandy Welch [REDACTED]
Sent: Wednesday, May 1, 2019 3:58 PM
To: Currey Cook <ccook@lambdalegal.org>; Eden ♥ [REDACTED]

lcooper@aclu.org; Susan Dunn <sdunn@aclusc.org>

Subject: Fwd: Foster Parent Inquiry



----- Forwarded message -----

From: **Sharon Betts** <sbetts@miraclehill.org>

Date: Wed, May 1, 2019 at 2:22 PM

Subject: Foster Parent Inquiry

To: [Redacted]
[Redacted]

Dear Ms. Welch and Ms. Rogers,

We appreciate your interest in foster care, and we hope we can help you find a way to serve foster children in South Carolina. As you may recall from our telephone conversation on April 11, and as stated on our website, Miracle Hill Ministries is a Christian ministry, and we view our care for needy adults and children as not only compelled by our faith, but as a part of our religious exercise. Accordingly, while we will gladly find a place for anyone to volunteer within our ministry community, we require those who hold positions of spiritual responsibility or influence—including foster parents—to share our Christian mission, motivation, and beliefs.

You stated in your inquiry that you attend the Unitarian Universalist Church and that you are in agreement with our doctrinal statement. The Unitarian Universalist Church, however, does not align with traditional Christian doctrine and thereby would not be considered a Christian church. Because we feel a religious obligation to partner with foster parents who share our beliefs and who are active in a Christian church, Miracle Hill will not be a good fit to assist you in your quest to secure state licensure to become foster parents. We can gladly refer you to the following agencies which may be able to assist you in your pursuit of a foster care license.

- Heart Felt Calling/DSS (888.828.3555)
- Thornwell Children's Home (864.938.2792)
- Bair Foundation (864.281.0058)
- SAFY (864.250.1601)
- Connie Maxwell Home for Children (864.942.1400)
- Mentor (864.233.9727)
- SC Youth Advocate Program (864.676.0210)
- Growing Homes of Southeast (800.344.5498)
- Lutheran Family Services (843.694.5359)

Finally, as noted above, there are many volunteer opportunities at Miracle Hill for which we gladly welcome any volunteers who wish to assist us in providing tangible service to the needy in our community. Should you be interested in learning more, you may look at the volunteer opportunities on our website (www.miraclehill.org).



Miracle Hill
MINISTRIES

Sharon M. Betts

Foster Care Licensing Supervisor | Foster Care

490 S. Pleasantburg Drive | Greenville, SC 29607

Office: 864.268.4357 | Direct: 864.605.6093

Shelter, food and miracles. Every day.



Miracle Hill exists that homeless children and adults receive food and shelter with compassion, hear the Good News of Jesus Christ and move toward healthy relationships and stability.

This electronic communication (including attachments) may contain confidential information intended only for the use of the named recipient. If you are not the intended recipient, you are not authorized to intercept, read, print, retain, copy, forward, or disseminate this communication. If you have received this communication in error, please immediately notify us by return message or by telephone and delete this communication from your system. Thank you.

EXHIBIT 33

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

EDEN ROGERS and

BRANDY WELCH,

Plaintiffs,

vs. CASE NO. 6:19-cv-01567-TMC

UNITED STATES DEPARTMENT OF HEALTH
AND HUMAN SERVICES;
ALEX AZAR, in his official capacity as
Secretary of the UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
ADMINISTRATION FOR CHILDREN AND FAMILIES;
LYNN JOHNSON, in her official capacity as Assistant
Secretary of the ADMINISTRATION FOR CHILDREN AND
FAMILIES;
SCOTT LEKAN, in his official capacity as Principal
Deputy Assistant Secretary of the ADMINISTRATION
FOR CHILDREN AND FAMILIES;
HENRY MCMASTER, in his official capacity as
Governor of the STATE OF SOUTH CAROLINA;
MICHAEL LEACH, in his official capacity as State
Director of the SOUTH CAROLINA DEPARTMENT OF SOCIAL
SERVICES,

Defendants.

VIDEOTAPED
DEPOSITION OF: FREDDIE KAREN BUSHA
(APPEARING VIA VIRTUAL ZOOM)
DATE: June 21, 2021
TIME: 9:02 AM
REPORTED BY: TERRI L. BRUSSEAU
(APPEARING VIA VIRTUAL ZOOM)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

LOCATION OF THE DEPONENT: Haynsworth Sinkler Boyd, PA
One North Main Street, 2nd Floor
Greenville, SC 29601
TAKEN BY: Counsel for the Plaintiffs
(Katherine Janson)

APPEARANCES OF COUNSEL:

ATTORNEYS FOR THE PLAINTIFFS

EDEN ROGERS and BRANDY WELCH:
CRAVATH SWAINES & MOORE, LLP
BY: KATHERINE D. JANSON
(APPEARING VIA VIRTUAL ZOOM)
SERENA CANDELARIA
(APPEARING VIA VIRTUAL ZOOM)

Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
(212) 474-1989
kjanson@cravath.com
scandelaria@cravath.com
LAMBDA LEGAL DEFENSE AND EDUCATION
FUND, INC.

BY: M. CURREY COOK
(APPEARING VIA VIRTUAL ZOOM)
MAIA ZELKIND
(APPEARING VIA VIRTUAL ZOOM)

120 Wall Street, 19th Floor
New York, NY 10005
(212) 809-8585
ccook@lambdalegal.org
mzelkind@lambdalegal.org

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ATTORNEYS FOR THE DEFENDANTS
HEALTH AND HUMAN SERVICES,
ADMINISTRATION FOR CHILDREN AND
FAMILIES, THE SECRETARY OF HHS, LYNN
JOHNSON, THE ASSISTANT SECRETARY OF
ADMINISTRATION OF CHILDREN AND
FAMILIES, AND STEVEN WAGNER, ASSISTANT
SECRETARY OF ADMINISTRATION CHILDREN
AND FAMILIES:
UNITED STATES ATTORNEY'S OFFICE
DISTRICT OF SOUTH CAROLINA
BY: CHRISTIE V. NEWMAN,
ASSISTANT UNITED STATES ATTORNEY
(APPEARING VIA VIRTUAL ZOOM)
55 Beattie Place, Suite 700
Greenville, SC 29601
(864) 282-2100
christie.newman@usdoj.gov

ATTORNEYS FOR THE DEFENDANTS
HENRY MCMASTER, IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF THE STATE OF
SOUTH CAROLINA AND MICHAEL LEACH, IN
HIS OFFICIAL CAPACITY AS STATE DIRECTOR
OF THE SOUTH CAROLINA DEPARTMENT OF
SOCIAL SERVICES:
NELSON MULLINS RILEY & SCARBOROUGH, LLP
BY: MILES E. COLEMAN
(APPEARING VIA VIRTUAL ZOOM)
1320 Main Street, 17th Floor
Greenville, SC 29201
(803) 799-2000
miles.coleman@nelsonmullins.com

ATTORNEYS FOR MIRACLE HILL MINISTRIES, INC.
AND DEPONENT FREDDIE KAREN BUSHA:

HAYNSWORTH SINKLER BOYD, PA
BY: STEVE A. MATTHEWS
1201 Main Street, 22nd Floor
Columbia, SC 29201-3232
(803) 779-3080
smatthews@hsblawfirm.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ALSO PRESENT:

**Andy Bos, Concierge Technician
(Appearing Via Virtual Zoom)**

**Darren Carreras, Video Technician
(Appearing Via Virtual Zoom)**

(INDEX AT REAR OF TRANSCRIPT)

1 VIDEO TECHNICIAN: Good morning,
2 Counselors. My name is Darren Carreras. I'm a
3 certified legal videographer in association with
4 Veritext.

5 Due to the severity of COVID-19,
6 following the practice of social distancing, I will
7 not be in the same room with the witness. Instead,
8 I will record this videotaped deposition remotely.
9 The reporter, Terri L. Brusseau, also will not be
10 in the same room and will swear the witness
11 remotely.

12 Do all parties stipulate to the
13 validity of this video recording, remote swearing,
14 and that it will be admissible in the courtroom as
15 it had been -- as if it had been taken following
16 Rule 30 of the Federal Rules of Civil Procedures
17 and State's rules where this case is pending?

18 MR. COLEMAN: Yes.

19 MS. JANSON: Yes. Plaintiffs, yes.

20 MS. NEWMAN: Yes, federal defendants
21 do.

22 VIDEO TECHNICIAN: Okay. We're going
23 on the record at 9:02 AM on June 21st, 2021. This
24 is Media Unit 1, video recorded deposition of
25 Freddie Karen Busha, taken by counsel for Plaintiff

1 in the matter of Rogers verse U.S. Department of
2 Health and Human Services filed in United States
3 District Court for the District of South Carolina,
4 Greenville, Case Number 6:19-cv-01567-JD.

5 This deposition is being held remotely
6 via Zoom. My name is Darren Carreras with the firm
7 Veritext. I'm the videographer. The court
8 reporter is Terri Brusseau for the firm Veritext.
9 I'm not authorized to administer an oath. I'm not
10 related to any party in this action, nor am I
11 financially interested in the outcome.

12 Counsel and all present in the room,
13 everyone attending remotely, will now state their
14 appearances and affiliations for the record. If
15 there are any objections to proceeding, please
16 state them at the time of your appearance beginning
17 with the noticing attorney.

18 MS. JANSON: Kate Janson from Cravath
19 Swaine & Moore for the Plaintiffs.

20 MR. COOK: Currey Cook from Lambda
21 Legal for the Plaintiffs.

22 MS. CANDELARIA: Serena Candelaria from
23 Cravath Swaine & Moore for the Plaintiffs.

24 MS. ZELKIND: Maia Zelkind from Lambda
25 Legal for Plaintiffs.

1 MS. NEWMAN: Christie Newman for the
2 federal defendants.

3 MR. COLEMAN: Miles Coleman for Henry
4 McMaster in his official capacity as Governor of
5 the State of South Carolina and Michael Leach in
6 his official capacity as director of the South
7 Carolina Department of Health and Human Services.

8 MR. MATTHEWS: Steve Matthews with
9 Haynsworth Sinkler Boyd, lawyer for Miracle Hill
10 Ministries, Inc., here representing the witness,
11 Karen Busha.

12 VIDEO TECHNICIAN: Will the court
13 reporter please swear in the witness.

14 FREDDIE KAREN BUSHA
15 being first remotely sworn, testified as follows:

16 EXAMINATION

17 BY MS. JANSON:

18 Q. Good morning, Miss Busha. My name is
19 Kate Janson. I'm with the firm of Cravath Swaine &
20 Moore and we represent Plaintiffs Eden Rogers and
21 Brandy Welch in this case.

22 Would you please state your full name
23 again for the record.

24 A. Freddie Karen Busha.

25 Q. And what is your current address?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A. [REDACTED]

[REDACTED]

Q. Have you ever had your deposition taken before?

A. No.

Q. So I'm going to ask you a series of questions today. But before we dive in, I'll just go over a couple of simple ground rules that will help us make sure things run smoothly.

First of all, please make sure that you answer audibly and verbally. Nodding your head, for instance, can't be picked up by the court reporter. Also, please wait until I've finished asking my question before you begin your answer; and likewise, I'll make sure that I wait until you've finished your answer before I ask my -- my next question.

Your attorney may object to some of my questions. If he does that, you should still answer unless he specifically instructs you not to answer. If at any point you don't understand what I'm asking you and you need clarification, please ask and I'm happy to give that to you. If you don't ask for clarification, I'll assume that you understand what I'm asking. And please -- you

1 know, please direct any requests for clarification
2 to me rather than to your lawyer.

3 If at any time today during the
4 deposition you need to take a break for any reason,
5 just let me know. I'm happy to accommodate that.
6 I'll just ask that if there's a question pending,
7 that you answer the question before we take a
8 break. I'll also be mindful of timing and how long
9 we've been going and I'll suggest, you know, breaks
10 periodically as well.

11 And as you know, we are -- we're doing
12 this deposition remotely over Zoom, so just a
13 couple of notes regarding that. Even though we're
14 not together in a conference room, while we are on
15 the record you're not to communicate with anybody
16 by any means other than this video conferencing
17 platform. So that means -- that doesn't include
18 during the breaks, but while we're on the record
19 that means, you know, no e-mails, no texts, nothing
20 like that with anybody else.

21 And if for any reason you have an issue
22 with your connection and you can't see me or hear
23 me, you know, we'll obviously take a break and make
24 sure that we get that rectified as soon as
25 possible. Does that all make sense? Do you have

1 any questions with any of that?

2 A. Yes, and no questions.

3 Q. Great. You understand that your
4 testimony today is under oath and that you're being
5 videotaped?

6 A. Yes.

7 Q. Is there any reason that you can't
8 provide truthful and accurate testimony today?

9 A. No.

10 Q. Are you on any medication that would
11 interfere with your ability to testify truthfully
12 today?

13 A. No.

14 Q. Do you have any other condition that
15 would interfere with your ability to testify
16 truthfully today?

17 A. No.

18 Q. Great.

19 MS. JANSON: So, Serena, if we can just
20 put up Tab 47. We'll mark that as our first
21 exhibit.

22 Steve, this is just a Notice of
23 Deposition, so it doesn't have a -- have a Bates
24 number.

25 MR. MATTHEWS: Great.

1 MS. JANSON: We're just marking that
2 for housekeeping purposes.

3 (EXHIBIT 1, Letter dated 6/15/21 from
4 Nekki Shutt, with attached Notice of Taking
5 Deposition of Karen Busha Via Remote Means, was
6 marked for identification.)

7 BY MS. JANSON:

8 Q. So this is -- we're going to mark as
9 Exhibit 1. This is the Notice of Deposition of
10 Karen Busha Via Remote Means dated --

11 MR. MATTHEWS: Kate?

12 MS. JANSON: Yes.

13 MR. MATTHEWS: Excuse me one moment.
14 When you -- when you turned your head away from
15 your computer, we lost your audio a bit.

16 MS. JANSON: Okay. I'm pulling it --
17 pulling it towards me.

18 MR. MATTHEWS: Okay. Yeah, you weren't
19 speaking toward the microphone and couldn't hear
20 for a second.

21 MS. JANSON: Okay.

22 MR. MATTHEWS: Thank you.

23 MS. JANSON: Sorry about that.

24 MR. MATTHEWS: It's all right.

25 MS. JANSON: No, I was just indicating

1 that we're marking as Exhibit 1 the Notice of
2 Taking of Deposition of Karen Busha By Remote Means
3 dated June 15th, 2021.

4 BY MS. JANSON:

5 Q. Miss Busha, have you seen this
6 deposition notice before?

7 A. Yes.

8 Q. Okay. And did you receive it from --
9 from Mr. Matthews?

10 A. Yes.

11 Q. Did you do anything to prepare for
12 today's deposition?

13 A. Yes.

14 Q. What did you do to prepare?

15 A. I met with Mr. Matthews and some of the
16 leadership team from Miracle Hill Ministries.

17 Q. Okay. And who -- who were the members
18 of the Miracle Hill Ministries leadership team that
19 you met with?

20 A. Ryan Duerk, the CEO; Reid Lehman, the
21 former CEO; Brenda Parks, the foster care director;
22 and Sharon Betts, foster care supervisor.

23 Q. And when -- when was that meeting?

24 A. I can't remember. It was last week.

25 Q. Okay.

1 A. I don't remember which day. Sorry.

2 Q. Sure. No, that's fine. And was there
3 just one meeting or more than one meeting?

4 A. One meeting with that group and then I
5 had another meeting with Mr. Matthews yesterday.

6 Q. And approximately how long was your
7 meeting with Mr. Matthews and the group of folks
8 from Miracle Hill?

9 A. We were there from around 9:00 till
10 noon.

11 Q. And then your second meeting with
12 Mr. Matthews yesterday, about how long was that?

13 A. It was by phone for almost two hours.

14 Q. Apart from the people that you've
15 mentioned, was anyone else present at either of
16 those meetings?

17 A. No.

18 Q. Did you speak with anyone else apart
19 from the folks we've talked about in preparing for
20 the deposition today?

21 A. No.

22 Q. Did you review any documents in the
23 course of your preparation for the deposition
24 today?

25 A. Yes.

1 Q. Did any of those documents that you
2 looked at help refresh your recollection about past
3 events?

4 A. Yes.

5 Q. Are you able to tell me which documents
6 those were that refreshed your recollection of past
7 events?

8 A. All of the documents that you included
9 in the file that you sent to me. Mr. Matthews sent
10 to me.

11 Q. Sure. Yep. Did you look at
12 anything -- anything else in advance of the
13 deposition today, any electronic databases or
14 records on your computer or anything else?

15 A. No.

16 Q. So just the universe of documents that
17 we had sent over to Mr. Matthews in advance?

18 A. Yes.

19 Q. Okay. Anything else that you did to
20 prepare for the deposition today?

21 A. No.

22 Q. Did you speak with Mr. Coleman in
23 advance of today's deposition?

24 A. No.

25 Q. Have you ever met Mr. Coleman before,

1 before today?

2 A. Not face-to-face.

3 Q. You've spoken with him on the phone?

4 A. Yes.

5 Q. And when was that?

6 A. Probably a year and a half ago, two
7 years ago.

8 Q. Was that when Mr. Coleman was a lawyer
9 representing Miracle Hill?

10 A. Yes.

11 Q. So I'll just go through a few quick
12 background questions just about your education and
13 employment history. What is the highest level of
14 education that you obtained?

15 A. I have a Doctorate in Christian
16 Counseling.

17 Q. And from what institution did you
18 receive that degree?

19 A. Omega Theological Seminary.

20 Q. And that was in what year?

21 A. I believe 2 -- 1998.

22 Q. Okay. That's fine. Approximate is
23 fine. And what other -- what other degrees do you
24 hold?

25 A. I have a Master's in Education and

1 Counseling and Guidance from Clemson University
2 that I obtained in 1987.

3 Q. Um-hum. And then before that do you
4 have a Bachelor's degree as well?

5 A. I do. I have a Bachelor's degree in
6 Christian Education that I received from Irskin
7 College in 1979 and an Associate degree from
8 Anderson, it was college at that time, it's now
9 University, in 1977.

10 Q. Okay. And you used to be employed at
11 Miracle Hill Ministries, is that right?

12 A. That's correct.

13 Q. And when did you -- when did you leave
14 Miracle Hill?

15 A. I left Miracle Hill at the end of
16 January 2021.

17 Q. And why did you leave?

18 A. I left primarily because I was
19 exhausted.

20 Q. Are you employed elsewhere at this
21 point or no?

22 A. I work part-time for the Commission on
23 Accreditation of Rehab Facilities in Tucson,
24 Arizona.

25 Q. Okay.

1 A. As a behavioral health program
2 surveyor.

3 Q. And at the time of your departure from
4 Miracle Hill at -- in January of this year, how
5 long had you been employed at Miracle Hill?

6 A. Since August of 2018.

7 Q. And what was your position at Miracle
8 Hill when you left?

9 A. I was the vice president of children's
10 ministries.

11 Q. Can you describe for us just generally
12 what your responsibilities were in that position?

13 A. Yes. I was responsible for the overall
14 leadership for children's ministries, which
15 included four programs, our residential program for
16 children at Miracle Hill Children's Home in
17 Pumpkintown, South Carolina; I worked Miracle Hill
18 Boys' Shelter in Greenville, South Carolina; Homes
19 for Life, an independent living program for youth
20 transitioning out of DSS in Spartanburg, South
21 Carolina; and the foster care program for Miracle
22 Hill.

23 I was responsible for the direct
24 supervision of the four directors of those
25 programs. I was responsible for accreditation.

1 Miracle Hill's children's ministry is accredited by
2 the Commission on Accreditation of Rehab
3 Facilities, better known as CARF. I was
4 responsible for maintaining accreditation and of
5 overseeing reaccreditation in 2020. I was
6 responsible for program development and focused
7 primarily on ensuring our staff and foster parents
8 were trained in evidence-based models regarding
9 trauma.

10 Q. Okay. Great. And did you ever hold a
11 different position at Miracle Hill before your role
12 as vice president of children's ministries?

13 A. No.

14 Q. Where were you employed before you came
15 to Miracle Hill in 2018?

16 A. I'm a retired state employee. I worked
17 21 years in the alcohol and drug system in South
18 Carolina, better known as the Department of Alcohol
19 and Other Drug Studies. I worked in their private
20 agencies, three different agencies across the
21 state. The last ten years of my work with the
22 State of South Carolina, I worked with Lexington
23 County Community Mental Health in Lexington, South
24 Carolina.

25 Q. If I use the abbreviation CPA, will you

1 understand that I'm referring to a child placing
2 agency?

3 A. Yes.

4 Q. Apart from Miracle Hill, have you ever
5 been employed by any other CPA in South Carolina?

6 A. No.

7 Q. Were you -- were you required in the
8 course of your work at Miracle Hill as vice
9 president for children's -- of children's
10 ministries to complete any professional training of
11 any sort?

12 A. Not professional training.

13 Q. Any other kind of training?

14 A. On-the-job training.

15 Q. And can you describe for me just
16 generally what that type of training would have
17 entailed?

18 A. A week-long orientation by Miracle
19 Hill. I also trained under the interim vice
20 president of children's ministry, Jason Mowen,
21 while at Miracle Hill, and my direct supervisor,
22 Ken Kruithof, who was the COO.

23 Q. During the course of your work at
24 Miracle Hill, did you become familiar with
25 professional standards related to child welfare?

1 A. Yes.

2 Q. And what are -- what are some of those
3 standards?

4 A. So we had numerous professional
5 standards with regard to the care of children both
6 in residential care and in foster care. We were
7 required to ensure that -- ensure their safety and
8 wellbeing, that they received appropriate
9 healthcare, that they received an appropriate
10 education. Of course we were mandated reporters.
11 If we were aware of any abuse or neglect of
12 children, to report those to the authorities.

13 Q. Are you familiar with the Child Welfare
14 League of America standards of excellence?

15 A. No.

16 Q. So Miracle Hill is a private child
17 placing agency, correct?

18 A. Correct.

19 Q. And if you can just describe for me
20 generally, what is a child placing agency in South
21 Carolina?

22 A. We're licensed -- we were -- Miracle
23 Hill's licensed by the Department of Social
24 Services to license foster parents to care for
25 foster children through the Department of Social

1 Services.

2 Q. And so how -- how does Miracle Hill do
3 that? How does Miracle -- how does -- sorry. Let
4 me -- let me step back. We'll get to that in a
5 minute.

6 Just generally what role in the South
7 Carolina foster care system do CPAs like Miracle
8 Hill play?

9 A. Our main role is to place children in
10 foster homes.

11 Q. And as part of that, does Miracle Hill
12 work to recruit potential foster families?

13 A. Yes.

14 Q. How does Miracle Hill do that?

15 A. Those duties were assigned to the
16 director of foster care, who would speak publicly
17 based on invitations from the community.
18 Our web -- I believe our website also has
19 information on contacting us to be foster parents.

20 Q. And the director of foster care, who
21 was that?

22 A. Brenda Parks.

23 Q. Was she the person in that role for the
24 entirety of your time at Miracle Hill?

25 A. She was the director of foster care the

1 entire time, yes.

2 Q. And I think you said she would speak
3 publicly based on invitations from the community?

4 A. Yes.

5 Q. Were there certain communities within
6 the Greenville area that Miracle Hill would often
7 recruit from, like certain churches, any groups
8 like that?

9 A. I did not have a list of where she
10 presented or recruited from.

11 Q. Did Miracle -- does Miracle Hill also
12 advertise publicly beyond just its website in an
13 effort to recruit foster families?

14 A. I was not aware of any advertisement
15 while I was at Miracle Hill.

16 Q. Did Miracle Hill do work to support
17 potential foster families as they go through the
18 application process to become licensed as foster
19 parents?

20 A. I'm sorry, I missed part of your
21 question. Could you repeat it?

22 Q. Sure. Of course. Did Miracle Hill do
23 work to support potential foster families as they
24 go through the application process to become
25 licensed as foster parents?

1 A. We provided orientation prior
2 to appli -- prior to application and support foster
3 families through the licensing process once they
4 apply.

5 Q. And can you tell me a little more
6 specifically how Miracle Hill does that? How does
7 it support the foster families through the
8 licensing process?

9 A. I do not know the specifics of
10 everything foster care does through that process.

11 Q. Okay. Do you know whether Miracle Hill
12 would provide any support to foster families after
13 they're licensed?

14 A. Yes.

15 Q. And what types of supports were those?

16 A. We provided case management services.
17 Each family was assigned a case manager. Each
18 family was also assigned a licensing specialist, so
19 we assisted the families in staying in compliance
20 with the Department of Social Services standards.

21 We also supported the family with needs
22 that they may have regarding the children, if they
23 need diapers or clothes. Each year we held a
24 foster appreciate -- foster parent appreciation day
25 where foster families could come and we would have

1 a room set up from donations that we would receive,
2 everything from toys to clothes to blankets, to
3 make sure that families had access to new items for
4 their children that they had in care.

5 Q. You mentioned that each family would be
6 assigned a case manager.

7 A. Yes.

8 Q. And so that -- that person would be
9 assigned to work with the foster family as a whole
10 as opposed to being assigned to a particular child,
11 is that right?

12 A. They were assigned to both.

13 Q. Okay. Are you familiar with the term
14 Region 1 or the upstate region?

15 A. Yes.

16 Q. And what -- what is the upstate region?

17 A. It's the county -- it's -- the region
18 is assigned by DSS and it's all of the counties in
19 the upstate that fall under Region 1 as assigned by
20 DSS.

21 Q. And is that the region that Miracle
22 Hill serves with respect to the foster care
23 services?

24 A. Yes.

25 Q. Does -- to your knowledge, does Miracle

1 Hill have any specific criteria regarding the
2 individuals that it will work with as foster
3 parents?

4 A. Yes.

5 Q. And what are those criteria?

6 A. There's some criteria set by the
7 Department of Social Services with regard to
8 criminal background. And Miracle Hill also has a
9 doctrinal statement and license families who align
10 with their doctrinal statement.

11 Q. You've led perfectly into my -- into my
12 next document that I'd like to look at.

13 MS. JANSON: Serena, can you please put
14 up Tab 25? This is a document called the doctrinal
15 statement and it has the Bates stamp Miracle Hill
16 Subpoena 000375. And we're -- we're marking that
17 as Exhibit 2, I believe.

18 (EXHIBIT 2, Miracle Hill Ministries
19 Doctrinal Statement, MIRACLE_HILL_SUBP_00375, was
20 marked for identification.)

21 BY MS. JANSON:

22 Q. Miss Busha, have you seen this document
23 before?

24 A. Yes.

25 Q. And is this, in fact, Miracle Hill's

1 doctrinal statement that you just mentioned in your
2 prior answer?

3 A. Yes.

4 Q. And this document lays out the
5 religious tenets to which Miracle Hill adheres, is
6 that right?

7 A. Yes.

8 Q. And does Miracle Hill require that all
9 of the foster parents that it works with also agree
10 with this doctrinal statement?

11 A. Yes.

12 Q. All right. Let's --

13 MS. JANSON: Serena, let's put up Tab
14 23. This is going to be Exhibit 3. It is a
15 document titled Miracle Hill Ministries' Spiritual
16 Identity FAQ's and the Bates Number is Miracle Hill
17 Subpoena 012783.

18 (EXHIBIT 3, Miracle Hill Ministries'
19 Spiritual Identity FAQ's, MIRACLE_HILL_SUBP_012783
20 to 012784, was marked for identification.)

21 MR. MATTHEWS: Kate, you did say
22 012783?

23 MS. JANSON: I did, yep.

24 MR. MATTHEWS: Great. Thank you.

25 BY MS. JANSON:

1 Q. Have you seen this document before?

2 A. Yes.

3 Q. And this appears to be a list of FAQ's,
4 that usually stands for frequently asked question,
5 that Miracle Hill published about its spiritual
6 identity, is that right?

7 A. I don't know the purpose of their
8 publishing this.

9 Q. Okay. Do you see down at the bottom of
10 the first page there's a question that reads: How
11 will you determine if someone meets your criteria
12 to serve as a foster parent, mentor or employee?

13 Do you see that there?

14 A. Yes.

15 Q. And then the answer says: Our mission
16 statement and doctrinal statement of faith will
17 guide our interview process as we invite followers
18 of Jesus Christ to partner with us in ministry to
19 share the Good News of Christ and minister to the
20 needy in His name.

21 Do you see that answer there?

22 A. Yes.

23 Q. So does that mean that Miracle Hill
24 only works with potential foster parents who are
25 followers of Jesus Christ?

1 MR. MATTHEWS: Object to the form of
2 the question. This witness is not a 30(b)(6)
3 witness and you can't ask for Miracle Hill, but can
4 only answer as to her understanding while she was
5 employed there.

6 MS. JANSON: Fair enough. Let me
7 rephrase.

8 BY MS. JANSON:

9 Q. To your knowledge, based on your work
10 as an employee at Miracle Hill, has Miracle Hill
11 only worked with potential foster parents who are
12 followers of Jesus Christ?

13 A. That was my understanding, yes.

14 Q. And was it also your understanding --
15 was it your understanding then that Miracle Hill
16 would not partner with members of a different faith
17 to serve as foster parents?

18 A. Yes, that was my understanding.

19 Q. And was it also your understanding that
20 Miracle Hill would not partner with people who did
21 not adhere to any faith at all as potential foster
22 parents?

23 A. Yes, that was my understanding.

24 Q. So to your under -- to your knowledge
25 Miracle Hill would not work, for example, with

1 potential foster parents who were Jewish, right?

2 A. Yes, that was my understanding.

3 Q. Or Muslim, for instance?

4 A. Correct.

5 Q. Okay. And is it correct based on your
6 understanding that Miracle Hill would only work
7 with potential foster parents who were Protestant
8 Christians?

9 MR. COLEMAN: This is Miles.

10 Objection, form of the question.

11 BY MS. JANSON:

12 Q. Do you want me to -- do you want me to
13 restate it?

14 A. Yes.

15 Q. Okay. Sorry. During -- during your
16 time at Miracle Hill as the vice president of
17 children's ministries, was there a policy at some
18 point that Miracle Hill would only work with
19 potential foster parents who were Protestant
20 Christians?

21 A. For part of the time, yes.

22 Q. So for part of the time that you were
23 there, Miracle Hill would not work with Catholic
24 individuals as potential foster parents, is that
25 right?

1 A. That's correct.

2 Q. All right. Let's take a look at
3 another document. This is going to be Exhibit 4.
4 Serena, it's Tab 15. And this is a document Bates
5 numbered Miracle Hill Subpoena 4623 and it's an
6 e-mail chain from Miss Busha to Sharon Betts and
7 Brenda Parks dated January 3rd, 2019.

8 (EXHIBIT 4, E-mail chain dated 1/3/19
9 to Sharon Betts and Brenda Parks from Karen Busha,
10 MIRACLE_HILL_SUBP_004623 to 004626, was marked for
11 identification.)

12 BY MS. JANSON:

13 Q. Have you seen this -- this document
14 before, Miss Busha?

15 A. Yes.

16 Q. And, first of all, I know you -- I
17 think you mentioned her name earlier, but who is
18 Sharon Betts?

19 A. Sharon is the foster care licensing
20 supervisor for Miracle Hill.

21 Q. And who did -- who -- who did she
22 report to or did she report to at this time?

23 A. Brenda Parks, the foster care director.

24 Q. Okay. If you look at the last page of
25 this, of this e-mail chain, Miss Betts is writing

1 to a recipient whose name is redacted. And she
2 writes: Could you tell me about your current
3 church and involvement in the church? Is your
4 church between pastors at the present time? Also,
5 could blank please explain more about the time when
6 she met Jesus for salvation?

7 Do you see that there at the bottom of
8 the e-mail chain?

9 A. Yes.

10 Q. And then in response, the recipient
11 whose -- whose name is redacted, replied with some
12 information about their religious background and
13 writes: I have always had a love of Jesus and
14 always wanted to be a nun and joined a future
15 sisters group when I was young.

16 And then goes on a little later to say:
17 My belief is that God sent his Son, Jesus, for all
18 who believe in Him despite the denomination or
19 church they attend.

20 Do you see that in the -- sort of in
21 the second to last e-mail in the chain there?

22 A. Yes.

23 Q. And then on the page with the Bates
24 ending in -- the Bates Number ending 4625, it's an
25 e-mail again from Miss Betts replying. And in the

1 top paragraph on that page she writes: However, by
2 board policy, we can only recruit and shepherd
3 foster families who are active in a Protestant
4 church. This is not a judgment against Catholics.
5 It reflects our identity as a Protestant ministry,
6 teaching traditional Protestant doctrine supported
7 by and accountable to Protestant churches.

8 Do you see that there?

9 A. Yes.

10 Q. And thank you for bearing with me as we
11 walk through this. I just want to make sure we --
12 we understand what's going on in this e-mail chain.

13 And then an e-mail right above that,
14 the recipient is responding to Miss Betts and she
15 writes: Your reply to me was very disturbing.

16 And then slightly later on it says that
17 Miss Betts' response does not -- quote: Does not
18 take into account the variations of the many
19 Protestant churches, but definitely segregates
20 Catholics.

21 Do you see that there?

22 A. Yes.

23 Q. And then it looks like Miss Betts
24 forwarded the e-mail to -- to Reid Lehman, who then
25 would have cc'd Ken Kruithof. Am I saying his name

1 correctly?

2 A. Yes.

3 Q. Kruithof? And it looks like I think
4 he -- and then he forwarded it on to you. I know
5 you mentioned Mr. Kruithof before and you said he
6 was your -- your direct boss as the --

7 A. Yes.

8 Q. -- COO of Miracle Hill, is that right?

9 A. Yes, that's correct.

10 Q. Okay. Does he still work in that
11 position now?

12 A. Yes. As far as I know, yes.

13 Q. And then after you received this chain
14 from Mr. Kruithof, you forwarded it to Miss Betts
15 and Miss Parks and you wrote: Thanks, Sharon, for
16 doing a beautiful job on this. I too am saddened
17 that they are wounded.

18 What was it about -- what did you mean
19 when you said that Miss Betts had done a beautiful
20 job?

21 A. It was a compliment on her
22 communication with the -- the applicant.

23 Q. And what was it about her communication
24 with the applicant that you felt warranted a
25 compliment?

1 A. Her attempt to manage a very painful
2 and difficult situation.

3 Q. And why did you believe that that --
4 the situation was painful and difficult?

5 A. Because the person who had submitted
6 the inquiry was wounded by -- by her response.

7 Q. So you recognized that -- the fact that
8 this recipient's application had been rejected
9 because of his or her Catholic faith had been --
10 had been hurtful to them, right?

11 A. Yes.

12 MR. COLEMAN: This is Miles. Object to
13 the form of the question. You can answer.

14 THE WITNESS: Yes.

15 MS. JANSON: Okay. I'd like to look at
16 Tab 16, Serena. And we're going to mark this one
17 as Exhibit 5, I think. And this is a document with
18 the Bates label Miracle Hill Subpoena 2366 and it's
19 an e-mail thread from Miss Busha to Mr. Kruithof
20 dated March 8th, 2019.

21 (EXHIBIT 5, E-mail chain dated 3/8/19
22 to Ken Kruithof from Karen Busha,
23 MIRACLE_HILL_SUBP_002366 to 002367, was marked for
24 identification.)

25 BY MS. JANSON:

1 Q. Are you familiar with this document?

2 A. Yes.

3 Q. If you look at the -- at the bottom
4 e-mail on the page marked 2366. It's -- it's
5 Miss Betts and she is writing to a recipient whose
6 name is redacted. And she writes: We noted that
7 you did not include your church denomination or
8 personal testimonies of when you met Jesus for
9 salvation. If you would send that to us, we would
10 be glad to let you know of the next steps in our
11 licensing process.

12 Do you see that there?

13 A. Yes.

14 Q. And then an e-mail right above, the
15 recipient responds to Miss Betts and she says: I
16 am confirmed Lutheran and my husband is baptized
17 Catholic. We moved to South Carolina from Georgia
18 this past year and have attended a
19 nondenominational church a few times this winter.

20 Do you see that there?

21 A. Yes.

22 Q. And then you forward the e-mail chain
23 to Mr. Kruihof and -- and you write: FYI, this is
24 the request Sharon received that I discussed with
25 you yesterday. Again, this was not approval to be

1 a foster parent, but to come to orientation where
2 Brenda shares our doctrinal statement.

3 First of all, why -- why would you have
4 discussed this particular applicant with
5 Mr. Kruithof?

6 A. Because one of the applicants was
7 baptized Catholic.

8 Q. Was it typically brought to your
9 attention when an application was received from
10 somebody who was Catholic?

11 A. Not initially. That was a later
12 request that I made that any applicants that came
13 in would be discussed with -- with me.

14 Q. Do you know -- do you know why this
15 particular application then was brought to your
16 attention?

17 A. Because I had requested that they be
18 brought to my attention.

19 Q. Okay. So this was after you had -- you
20 made that request?

21 A. I believe so.

22 Q. Okay. And when you brought this
23 application to Mr. Kruithof's attention, do you
24 remember whether you had a discussion with him
25 about it in particular?

1 A. I don't remember the particular
2 discussion.

3 Q. And you don't remember what he would
4 have said about this application?

5 A. Because we invited them to orientation,
6 we were moving forward with the app -- with the
7 inquiry. That was the next step in the process.

8 Q. Okay. So at this time in March of
9 2019, in order to work with Miracle Hill as
10 prospective -- as potential foster parents, did
11 both spouses who were applying have to be
12 Protestant Christians?

13 A. I don't recall the date that Miracle
14 Hill changed their policy.

15 MS. JANSON: Okay. Let's see here.
16 Serena, why don't -- why don't we look at Tab 27.
17 And this is a document bearing the Bates Number
18 Miracle Hill Subpoena 244. This will be Exhibit 6.
19 And it's a document, a press release, titled
20 Miracle Hill Ministries Strengthens Christian
21 Identity by Opening Foster Program to Catholic
22 Foster Care Parents.

23 (EXHIBIT 6, Document entitled Miracle
24 Hill Ministries Strengthens Christian Identity by
25 Opening Foster Programs to Catholic Foster Parents,

1 MIRACLE_HILL_SUBP_000244 to 000245, was marked for
2 identification.)

3 BY MS. JANSON:

4 Q. Do you have that in front of you,
5 Miss Busha?

6 A. Yes, I do.

7 Q. And do you recognize this document?

8 A. Yes.

9 Q. If you look at the -- at the very top
10 in the first paragraph there, it's dated July 5th,
11 2019. Do you see that?

12 A. Yes.

13 Q. So is it fair to say that it was right
14 around that period in -- in early July of 2019 when
15 Miracle Hill changed its policy to open the foster
16 care program to Catholic foster parents?

17 A. I don't remember the date it was
18 actually changed. This was the press release.

19 Q. Okay. So if we go back to -- to
20 Exhibit 5, that was the e-mail thread with the
21 Bates Number 2366.

22 A. Yes.

23 Q. And that was dated March 8th, 2019,
24 right?

25 A. Yes.

1 Q. So it was -- it was several months in
2 advance of the press release that went out
3 announcing Miracle Hill's change in policy to work
4 with Catholics as potential foster parents, right?

5 A. Yes.

6 Q. Okay. So just to revisit my -- my
7 prior question. Do you know whether in March of
8 2019 Miracle Hill would have required both members
9 of a couple who were applying to be potential -- to
10 be foster parents to be Protestant Christians?

11 A. I don't believe so, that we would have
12 required both to be Protestant Christians at that
13 point.

14 Q. Okay. So in this e-mail chain in
15 Exhibit 5, the recipient says that he or she was
16 Lutheran. Is Lutheran -- do you consider
17 Lutheranism to be Protestant denominations?

18 A. I'm -- I'm not an expert on Protestant
19 denominations.

20 Q. Okay. So you don't -- you don't have
21 an understanding one way or the other as to whether
22 Lutheranism is considered Protestant?

23 A. No.

24 Q. Okay. Now, this application -- I think
25 you said earlier the next step in the process with

1 this application was that they would come to an
2 orientation with Miracle Hill, is that right?

3 A. Yes.

4 Q. And why was it then that this couple
5 who is described in the e-mail chain here that's
6 Exhibit 5 was invited to an orientation whereas the
7 applicant who we looked at in Exhibit 4 was -- had
8 their -- had their application rejected outright?
9 Do you have an understanding of that?

10 A. I don't know which applicant you're
11 talking about that was rejected.

12 Q. Sorry, that was -- that's the document
13 that we marked as Exhibit 4. It has the Bates
14 Number 4623.

15 A. I do not know.

16 Q. Okay. Looking back then at Exhibit 5,
17 which is the document with the Bates Number 2366.
18 And thank you for -- for bearing with me as we flip
19 back and forth among all these documents. I know
20 it gets a little confusing.

21 Do you -- without disclosing their
22 identities, do you happen to recall who the
23 applicants that were involved in this e-mail chain,
24 who they were?

25 A. No.

1 Q. Okay. Looking at that same document.
2 The very last line of Miss Betts' original -- her
3 original e-mail, so this is the page marked 2367,
4 she writes: Thank you for your interest
5 specifically in a teenager who is in group care.
6 These children need foster homes too.

7 MR. MATTHEWS: Hold on one moment,
8 Kate. She needs to find that document.

9 MS. JANSON: Sure.

10 MR. MATTHEWS: Yes. Second page. I'm
11 sorry, if -- if you would repeat that last part of
12 your question.

13 BY MS. JANSON:

14 Q. Yeah, of course. So if you look at the
15 second page of the document with the Number 2367 at
16 the bottom, the first line there is an e-mail
17 from -- it's Miss Betts' original e-mail and she
18 writes: Thank you for your interest specifically
19 in a teenager who is in group care. These children
20 need foster homes too.

21 Do you see that?

22 A. Yes, I see that.

23 Q. Okay. Does -- does Miracle Hill run --
24 run a group home?

25 A. Not today.

1 Q. Did it previously?

2 A. Yes.

3 Q. And was that home called the Miracle
4 Hill Children's Home?

5 A. That was one of the group homes.

6 Q. Was there another one?

7 A. Yes.

8 Q. And what was that one called?

9 A. The Miracle Hill Boys' Shelter and
10 Homes for Life.

11 Q. So there were three total?

12 A. Yes.

13 Q. Are any of the -- to your knowledge,
14 are any of the three still open today?

15 A. No.

16 Q. When -- when did Miracle Hill stop
17 running the Miracle Hill Children's Home?

18 A. 2020.

19 Q. Okay. And how about the Miracle Hill
20 Boys' Shelter?

21 A. The end of 2020.

22 Q. And how about Homes for Life?

23 A. I believe that was in 2019.

24 Q. What is your understanding as to why
25 Miracle Hill stopped running the Miracle Hill

1 Children's Home?

2 A. Lack of referrals from the Department
3 of Social Services.

4 Q. Does that mean there weren't enough
5 children to house them in the home?

6 A. Yes. We didn't have enough referrals
7 to house children.

8 Q. Okay.

9 A. Serve children. We didn't want to
10 house children, serve them.

11 Q. Of course. That's a -- yeah, poor
12 choice of words on my -- on my part. I understand.
13 And how about the Boys' Shelter, was it -- was it
14 the same reason?

15 A. Yes.

16 Q. And what about Homes for Life? What
17 was the reason to your understanding that that
18 closed?

19 A. That was the same reason.

20 Q. And before -- before it was closed
21 during the time when you worked at Miracle Hill, do
22 you have an understanding of approximately how many
23 children resided in the Miracle Hill Children's
24 Home at any given time?

25 A. We had the -- we were licensed for 44

1 beds.

2 Q. Do you know -- do you know how many of
3 those -- of those beds were -- you know, were
4 filled, for lack of a better word, during your time
5 at Miracle Hill?

6 A. I don't recall the exact numbers.

7 Q. Do you have a general sense of what
8 proportion of the children who were served through
9 the Miracle Hill Children's Home were teenagers?

10 A. I don't have those statistics.

11 Q. Not looking for precise numbers, but do
12 you have a general sense? Was it half of the kids,
13 was it 75 percent of the kids, any sort of ballpark
14 kind of understanding you can give me?

15 A. My best recollection would be probably
16 about half of the children at the children's home.

17 Q. Do you have a sense of how many at the
18 Boys' Shelter approximately would have been
19 teenagers?

20 A. Probably 99 percent of the youth there.

21 Q. Okay. Is it right that the South
22 Carolina Department of Social Services is the
23 entity that would make the ultimate decision
24 regarding placement of children in foster homes?
25 Is that right?

1 A. Yes. They have the ultimate
2 responsibility.

3 Q. And to your knowledge, based on your
4 role at Miracle Hill, what role or what involvement
5 did Miracle Hill have in the placement process for
6 children that resided in its group homes?

7 A. Could you ask me that question again,
8 please?

9 Q. Sure. Sure. To your knowledge, did
10 Miracle Hill play a role in the placement process
11 for children that resided in its group homes?

12 A. Yes.

13 Q. And what was that role?

14 A. DSS would contact us when they had a
15 child who needed residential care, and that child
16 would be screened for admission and admitted.

17 Q. Okay. And was it -- was it the
18 ultimate goal that the children who were in Miracle
19 Hill's children's homes would ultimately be placed
20 with a foster family?

21 A. Yes, and are reunited with their
22 family.

23 Q. Okay. With their family of origin,
24 right?

25 A. Yes. Yes, ma'am.

1 Q. And did -- did Miracle Hill play a role
2 in the process by which children who lived in one
3 of its group homes were placed with a foster
4 family?

5 A. Yes.

6 Q. And generally speaking, what -- what
7 was that role that Miracle Hill played in that
8 process?

9 A. Our residential directors and the
10 foster care director would communicate about
11 open -- open homes that may be good placements for
12 our children. Of course DSS was involved in that
13 conversation as well to see if the child could be
14 moved from group care to foster care.

15 Q. Okay. And in your experience, is it
16 typically more difficult to find foster parents who
17 are willing to foster teenagers?

18 A. Yes.

19 Q. Why -- why do you think that is?

20 A. I think that teenagers, because they
21 had been oftentimes in the system of DSS a very
22 long time and they've often been moved from foster
23 home to foster home, they have more challenging
24 behaviors and some foster families are not equipped
25 to manage those behaviors.

1 Q. Okay. Thank you. Okay. So we already
2 marked as Exhibit 6 the press release where Miracle
3 Hill announced its change in policy to start
4 working with -- with Catholics as potential foster
5 parents. That's the document with the Bates number
6 ending 244. And I just want to take -- I just want
7 to take a closer look at that for a minute.

8 If you look down in the one, two,
9 three, fourth paragraph of that press release,
10 it's -- it mentions a lawsuit filed by Aimee
11 Madonna that gave the impression that Miracle Hill
12 was in a dispute with other followers of Jesus
13 Christ. Are you familiar at all with the lawsuit
14 mentioned there that was filed by a plaintiff named
15 Aimee Madonna?

16 A. I am not familiar with the lawsuit. I
17 have heard her name.

18 Q. And in what -- in what context have you
19 heard her name?

20 MR. MATTHEWS: I'm going to object to
21 the extent that that asks for attorney/client
22 privileged information. To the extent that the
23 witness' knowledge of Aimee Madonna relates to
24 information she heard from an attorney, either for
25 herself or for Miracle Hill, it would be privileged

1 and I will instruct her not to answer. To the
2 extent that she has knowledge that is derived from
3 some other source other than an attorney
4 representing her or Miracle Hill, she can answer
5 the question.

6 THE WITNESS: Could you repeat the
7 question?

8 BY MS. JANSON:

9 Q. Sure. My question was just in what
10 context had you heard Aimee Madonna's name?

11 A. In conversation with Brenda Parks, the
12 foster care director, she had mentioned her name.

13 Q. Do you remember anything more about
14 what Miss Parks had told you about Aimee Madonna?

15 A. No.

16 Q. Do you have any understanding of what
17 it means here in the press release that the lawsuit
18 filed by Miss Madonna, quote, gave the impression
19 that Miracle Hill Ministries was in a dispute with
20 other followers of Jesus Christ?

21 A. My recollection is that this was
22 referring to being in dispute with a Catholic
23 church.

24 Q. Okay. I think we touched on when we
25 first marked this -- with this document earlier.

1 This press release is announcing that Miracle Hill
2 has opened the door for Catholics as foster parents
3 and to work with Miracle Hill as prospective foster
4 parents, is that right?

5 A. Yes.

6 Q. To your knowledge, though, would
7 prospective -- prospective foster parents who are
8 Catholic still be required to agree with Miracle
9 Hill's doctrinal statement? That's the document
10 that we looked at earlier and that we marked as
11 Exhibit 2.

12 A. Yes.

13 Q. And the press release, in fact,
14 reflects that it states that Christians who share a
15 commitment to the gospel and embrace our doctrinal
16 statement and belief and practice are valued
17 ministry partners in employment and in fostering,
18 is that right?

19 A. You're reading that from the doctrinal
20 statement?

21 Q. No, that comes from the -- that comes
22 from the press release.

23 A. Can you repeat the question, please?

24 Q. Sure. I'm just looking for the
25 language. Actually, let's -- let's skip that one

1 and move on.

2 So as we discussed -- as we discussed
3 before Miracle Hill's doctrinal statement, and that
4 is the document we marked as Exhibit 2 with the
5 Bates number ending 375, does that -- that
6 doctrinal statement sets out Miracle Hill's
7 religious beliefs, right?

8 A. Yes.

9 Q. And is it fair to describe those
10 beliefs as Evangelical Protestant belief?

11 A. Yes.

12 MR. COLEMAN: This is Miles. Object to
13 the form of the question.

14 BY MS. JANSON:

15 Q. And the doctrinal statement required,
16 for example, if you look at -- let's see, one, two,
17 three, four, five, six, the seventh statement in
18 the doctrinal statement, it says: We believe that
19 the Holy Spirit unites all believers in the Lord
20 Jesus Christ and together they form one body, the
21 church.

22 Do you see that there?

23 A. Yes.

24 Q. Do you have any understanding as to
25 whether practicing Catholics would typically agree

1 that, quote, all believers in the Lord Jesus Christ
2 form -- together form the church?

3 A. I don't know.

4 Q. All right. Let's look at -- Serena,
5 let's look at Tab 30. This is a document with the
6 Bates Number Miracle Hill Subpoena 4467. We're
7 going to mark it as Exhibit 7. And it is a e-mail
8 thread between Reid Lehman and Miss Busha and
9 others dated September 24th, 2019.

10 (EXHIBIT 7, E-mail chain dated 9/24/19
11 to Karen Busha and Ken Kruithof from Reid Lehman,
12 MIRACLE_HILL_SUBP_004467 to 004470, was marked for
13 identification.)

14 BY MS. JANSON:

15 Q. Have you seen -- have you seen this
16 e-mail chain before, Miss Busha?

17 A. Yes.

18 Q. If you turn to the last page of the
19 chain, it's the page with the Bates Number 4469.
20 That is -- that is an e-mail from Sharon Betts and
21 she is writing to a recipient whose name is
22 redacted.

23 She writes: Thank you for your recent
24 inquiry into our foster parent program. Since you
25 read our doctrinal statement on the website when

1 you inquired, I have a few additional questions for
2 each of you.

3 And I think by each of you there, she's
4 referring to the foster applicants whose names are
5 redacted. And then she lists -- lists four
6 questions there. At this time, this is September
7 of 2019, were -- were those questions that Miracle
8 Hill asked of all the applicants that were
9 interested in working with Miracle Hill as foster
10 parents?

11 A. I don't know.

12 Q. You don't know whether those were
13 questions that were reserved for Catholic
14 applicants?

15 MR. COLEMAN: This is Miles. Objection
16 to the form of the question.

17 BY MS. JANSON:

18 Q. Would you like me to repeat it?

19 A. My recollection was that all applicants
20 were to be questioned the same. There was to be no
21 difference.

22 Q. No difference between Catholic
23 applicants and Protestant applicants?

24 A. Neither of the applicant, correct.

25 Q. Okay. So if you look at the next page

1 of the document with the Bates number ending 44 --
2 4468, it looks there -- and I won't read it all,
3 but it looks like the applicant has provided her
4 answers to Miss Betts' questions.

5 And then on the first page of the
6 e-mail chain at the very bottom, Miss Betts
7 forwards the answers to Miss Parks and she says:
8 Here are the Catholic lady's answers. And then it
9 looks like just above that, ultimately those
10 answers were forwarded on to you. Is that an
11 accurate description --

12 A. Yes.

13 Q. -- of what's going on here?

14 A. Yes.

15 Q. Do you remember why it was that the
16 Catholic lady's answers to those questions would
17 have been forwarded to you?

18 A. I had requested the applicants be
19 forwarded to me.

20 Q. The applications from Catholic
21 prospective foster parents, right?

22 A. Yes.

23 Q. Okay. Great. And then you forward --
24 you forward the e-mail chain to Mr. Lehman and
25 Mr. Kruithof, and you write: You may not want this

1 much detail, but I'm delighted to share we have had
2 our first inquiry from a woman who is a DSS
3 employee and works with Miracle Hill fostering.
4 She is Catholic and her husband is Baptist. Brenda
5 and I felt good about her responses below and will
6 be taking next steps with her regarding our
7 doctrinal statement and application.

8 Why was it that you had forwarded this
9 information about this applicant to -- to
10 Mr. Lehman, who at the time I believe was the
11 president and CEO of Miracle Hill, is that right?

12 A. That's correct.

13 Q. And why was it that you forwarded the
14 information about this applicant to Mr. Lehman?

15 A. Because he and Mr. Kruithof had asked
16 me to keep them informed if we received Catholic
17 applicants because we were excited to have them
18 join us in foster care.

19 Q. And then Mr. Lehman writes back to you
20 and to Mr. Kruithof and he cc's someone named
21 Sandra Furnell and he writes: Praise God. May
22 this prove to be an application we can move forward
23 with. Thanks for letting us know.

24 First of all, who -- who is Sandra
25 Furnell?

1 A. At that time she was the communication
2 director for Miracle Hill Ministries.

3 Q. Do you know why Mr. Lehman would have
4 cc'd her on this e-mail?

5 A. Miss Furnell was part of the -- my
6 understanding is that Miss Furnell was part of
7 the -- my understanding is that Miss Furnell was
8 part of the communication that went out in the
9 press release, that was part of her job duties. I
10 can't speak to why Mr. Lehman would forward it to
11 her.

12 Q. Okay. Do you know whether Miss Furnell
13 in her role as a communications director ever
14 incorporated foster parent applicants' stories into
15 Miracle Hill's like press releases or PR materials?

16 A. I'm not aware of -- of what she did.

17 Q. Okay. And in your e-mail where you
18 forwarded this to Mr. Lehman and Mr. Kruihof, you
19 noted that -- that you would be taking the next
20 steps with the applicant regarding the doctrinal
21 statement and application. Do you -- without -- of
22 course without revealing their identity, do you
23 remember this particular applicant, who they were?

24 A. No, I don't -- don't recall who they
25 were.

1 Q. Do you remember whether -- whether
2 Miracle Hill did, in fact, move forward with this
3 applicant in the next step in the application
4 process?

5 A. The applicant was given the -- the
6 inquirer was given the opportunity to come to
7 orientation to do the application. I do not know
8 if they followed through.

9 Q. Okay. So you don't ultimately know if
10 they signed the doctrinal statement, for instance?

11 A. I don't -- I don't know for this
12 applicant, no. This inquirer, no.

13 Q. Okay. You don't know ultimately what
14 ended up happening with them, whether they became
15 licensed or anything beyond what's in the e-mail?

16 A. No.

17 MS. JANSON: Okay. All right. So it's
18 about 10:15. We've been going for, you know, about
19 an hour and a quarter. This would be a good time
20 for a break from -- from my end if that's okay with
21 you.

22 THE WITNESS: Yes. Thank you.

23 MS. JANSON: Sure. Why don't we -- why
24 don't we take a break and come back at 10:30.

25 VIDEO TECHNICIAN: The time is 10:17

1 AM. We are going off the record.

2 (A recess transpired.)

3 VIDEO TECHNICIAN: The time is 10:31

4 AM. We are back on the record.

5 BY MS. JANSON:

6 Q. Okay. So let's -- let's take a look at
7 Tab 14. This is an e-mail with the Bates Number
8 Miracle Hill Subpoena 2572. We're going to mark
9 this as Exhibit 8 and it's an e-mail chain from
10 Miss Busha to Brenda Parks dated December 19, 2019.

11 (EXHIBIT 8, E-mail chain dated 12/19/19
12 to Brenda Parks from Karen Busha,
13 MIRACLE_HILL_SUBP_002572 to 002574, was marked for
14 identification.)

15 BY MS. JANSON:

16 Q. Do you recognize this document?

17 A. Yes.

18 Q. If you flip over to the second page of
19 the document with the Page 57 -- or the Page Number
20 2573 at the bottom. You write there to Miss Parks
21 in the second paragraph: Sharon is requesting
22 training on how to interview foster families that
23 are Catholic.

24 Do you see that there?

25 A. Yes.

1 Q. And the Sharon that you're referring
2 to, is that Miss Betts?

3 A. Yes.

4 Q. And then on the first page of the
5 document, Miss Parks replies to you and she says:
6 Yes, ma'am. She's wanting staff to feel more
7 comfortable when discussing with the potential
8 foster families.

9 And then it looks like the two of you,
10 Miss -- you and Miss Parks, set up a phone call to
11 talk about it the next day. Do you remember if you
12 actually had a -- had that phone call?

13 A. No, I don't -- I don't remember.

14 Q. Did Brenda ever explain to you -- I'm
15 sorry, Miss Parks. Did she ever explain to you
16 what she meant by Miss Betts' wanting staff to feel
17 more comfortable interviewing foster families that
18 are Catholic?

19 A. Did -- can you ask me that question
20 again, please?

21 Q. Sure. Did Miss Parks ever explain to
22 you what she meant when she referred to Miss Betts
23 wanting staff to feel more comfortable interviewing
24 foster families that are Catholic?

25 A. My understanding from Mrs. Parks was

1 that Miss Betts and some of the staff who had been
2 with Miracle Hill a long time needed more support
3 in adjusting to the change in the organization's
4 policy.

5 Q. And can you tell me -- can you say a
6 little bit more about that? What was your
7 understanding of why they felt that they needed --
8 some of the staff felt that they needed more
9 support in adjusting to the change -- the change in
10 policy whereby Miracle Hill would work with
11 Catholics as prospective foster parents?

12 A. I really did not understand their
13 struggle, not having their background with the
14 ministry. My goal was to ensure that everyone was
15 treated equally as far as whether it was a Catholic
16 or a Protestant, that they were all treated equally
17 and that there was no difference in how they were
18 treated.

19 Q. Did you have a sense that there were
20 employees at Miracle Hill who disagreed with the
21 policy change whereby Miracle Hill started working
22 with Catholics as prospective foster parents?

23 A. I wasn't aware of anyone who disagreed
24 directly.

25 Q. Anyone who disagreed indirectly?

1 A. No. I wasn't aware of anyone that
2 disagreed.

3 Q. Okay. Let's take a look at Tab 44.
4 And this is an e-mail with the Bates Number Miracle
5 Hill Subpoena 2576. We're going to mark this as
6 Exhibit 9. And it's an e-mail chain between Reid
7 Lehman to Miss Busha and Miss Parks dated January
8 9th of 2020.

9 (EXHIBIT 9, E-mail chain dated 1/9/20
10 to Brenda Parks and Karen Busha from Reid Lehman,
11 MIRACLE_HILL_SUBP_002576 to 002577, was marked for
12 identification.)

13 BY MS. JANSON:

14 Q. Do you recognize this -- this e-mail
15 chain?

16 A. Yes.

17 Q. And in the second e-mail there on the
18 first page of the document, Miss Parks writes that
19 she met with the licensing staff about engaging
20 with members of the Catholic faith and others. As
21 stated, I reviewed the doctrinal statement and
22 presented them with the questions that are used for
23 interviewing applicants. I believe it was well
24 received and advised them that I would be happy to
25 accompany them to any meeting with a potential

1 applicant with whom they were uncomfortable.

2 And then Mr. Lehman responds and he
3 writes: Good work. Thanks for working to help
4 free up our foster care staff to be more open in
5 their consideration.

6 Do you remember whether -- or do you
7 know whether Miss Parks' meeting that she's
8 referring to here with the licensing staff, did
9 that develop as a result of the e-mail discussion
10 that you and she had had in the prior exhibit that
11 we talked about?

12 A. No, I don't know.

13 Q. Okay. And the reference here to -- in
14 Miss Parks' e-mail to questions that are used for
15 interviewing applicants, are those questions that
16 were directed only at nonProtestant applicants for
17 foster care?

18 A. All of the -- all of the applicants
19 were to be interviewed the same.

20 Q. Okay. So there's a standard set of
21 questions that the Miracle Hill licensing staff
22 would use when they're interviewing an applicant
23 regardless whether that applicant identified
24 themselves as Protestant or Catholic?

25 A. I don't remember if a set of questions

1 was -- was established. I do know that all
2 applicants -- staff were instructed that all
3 applicants were to be interviewed the same.

4 Q. Okay. Do you know whether --
5 Miss Parks indicates in her e-mail that she told
6 the licensing staff that she would be happy to
7 accompany them to any meeting with a potential
8 applicant with whom they were uncomfortable.

9 Do you know if Miss Parks ever had to
10 accompany a member of the licensing staff to meet
11 with a potential applicant with whom they were
12 uncomfortable?

13 A. No, I don't know.

14 Q. And looking back at Mr. Lehman's e-mail
15 at the top of the document, do you have an
16 understanding of what he meant when he wrote thanks
17 for working to help free up our foster care staff
18 to be more open in their consideration?

19 A. No, I don't know what he meant.

20 Q. Okay. All right. So after Miracle
21 Hill made -- made its policy change to begin
22 working with Catholics as prospective foster
23 parents, do you know whether Miracle Hill has, in
24 fact, worked with prospective foster parents that
25 are Catholic and had them follow through the

1 process to becoming licensed?

2 A. When I left Miracle Hill, we had one
3 Catholic family that was licensed that I was aware
4 of.

5 Q. And so that Catholic family that became
6 licensed would have had to sign on to Miracle
7 Hill's doctrinal statement, right?

8 A. That's correct.

9 Q. Just ballpark, approximately how many
10 families would you say -- prospective foster
11 families does Miracle Hill work with per year?

12 A. When I was there, it was around 200.

13 Q. And is that -- is that the number that
14 are licensed?

15 A. Yes.

16 Q. Okay. So it would -- it might be a
17 larger number if you were talking about the number
18 of initial inquiries that Miracle Hill would
19 receive, right?

20 MR. MATTHEWS: Object to the form of
21 the question. I think you all are passing each
22 other in what you're asking and answering.

23 BY MS. JANSON:

24 Q. Okay. So, Miss Busha, you said -- I
25 asked approximately how many families would you

1 say -- approximately how many prospective foster
2 families does Miracle Hill work with per year and
3 you said when I was there, it was around 200.

4 So what I'm trying to understand is, is
5 200 the number of families who are actually
6 licensed to be foster families that Miracle Hill
7 works with in a given year or is it a different --
8 or is that a different number?

9 A. I misunderstood the question when
10 you -- I missed the word prospective. The 200
11 number or the number of licensed foster parents
12 with Miracle Hill, not those who have inquired.

13 Q. Okay. Do you have -- do you have a
14 sense of approximately how many new inquiries from
15 prospective foster families Miracle Hill gets in a
16 given year?

17 A. No. I do not know.

18 Q. Okay. And we covered this earlier, but
19 it's correct that Miracle Hill will not work with
20 any nonChristians as -- who are interested in
21 pursuing foster care, right?

22 A. That's my understanding.

23 Q. Okay. And would that be true even if a
24 nonChristian applicant agreed to sign Miracle
25 Hill's doctrinal statement?

1 A. If -- it isn't just signing the
2 statement, it is living the statement.

3 Q. I've seen language in a document, and I
4 can't point to it right now, but I think the phrase
5 was that applicants need to agree to the doctrinal
6 statement in belief and practice, right?

7 A. That was my understanding.

8 Q. Okay. Are you aware that the
9 Plaintiffs in this litigation are Eden Rogers and
10 Brandy Welch?

11 A. I am aware of them, yes.

12 Q. And at some point in 2019, Miracle Hill
13 received an inquiry from Miss Rogers and Miss Welch
14 about becoming potential foster parents, is that
15 right?

16 A. That's correct.

17 Q. Let's look at Tab 20. This is a
18 document with the Bates Number Miracle Hill
19 Subpoena 00593. We're going to mark this as
20 Exhibit 10. And this is a foster care inquiry form
21 that was submitted via Miracle Hill's website by
22 Brandy Welch on April 29th -- I'm sorry, April
23 28th, 2019.

24 (EXHIBIT 10, E-mail dated 4/28/19 to
25 Sharon Betts, Brenda Parks and Yvette Bates from

1 Brandy Welch, MIRACLE_HILL_SUBP_000593 to 000594,
2 was marked for identification.)

3 BY MS. JANSON:

4 Q. Have you seen this document before,
5 Miss Busha?

6 A. Not until you sent it to me.

7 Q. Okay. And does this, in fact, appear
8 to be the foster care inquiry form that Brandy
9 Welch submitted on the Miracle Hill website?

10 A. I have -- I did not see the inquiries
11 submitted by Miss Welch on the website.

12 Q. Okay. We'll just look at a couple -- a
13 couple sections of it. If you look about halfway
14 down the page, it looks like Miss Welch identifies
15 her spouse as Eden Rogers. Do you see that there?

16 A. Yes.

17 Q. And then at the bottom of the page the
18 question is asked: Why I want to be a foster
19 parent, check all that apply. And it looks like
20 Brandy checked I would like to help a child do
21 something good with his/her life and I know there
22 are children who need homes and I think I should
23 help.

24 And then below that she writes as an
25 additional reason: Even if it is for a short

1 period of time, we would like for more children to
2 know what it feels like to be unconditionally loved
3 and to be part of a loving family. We can provide
4 a safe and loving environment.

5 Do you see that there?

6 A. Yes.

7 Q. Okay. And then in the bottom section
8 of the application, it asks: Please give a brief
9 personal testimony of your faith/salvation in Jesus
10 Christ. If you are married, please indicate your
11 spouse's testimony as well.

12 And Brandy provides an answer there.
13 She writes: My wife and I have very similar
14 testimonies. We were both raised in Christian
15 homes and were both active in church through our
16 childhood and teenage years. I was part of a
17 Presbyterian church and my wife was part of a
18 Baptist church. As we have had life experiences
19 and grown into the people we are today and as a
20 same sex couple, we feel comfortable with the
21 Unitarian Universalist Church here locally, which
22 embraces diverse religious backgrounds. For us,
23 the core religious value of love is most important.

24 Do you see that there?

25 A. Yes.

1 Q. Do you know whether Miracle Hill's
2 foster care inquiry form on its website is the same
3 today as it was in April of 2019 when Miss Welch
4 submitted it?

5 A. I do not know.

6 Q. Okay. You don't know whether there has
7 been any changes to the -- to the inquiry form on
8 the website made since then?

9 A. That's correct, I do not know if there
10 have been any changes to the form.

11 Q. Okay. All right. Let's look at Tab 1.
12 This is going to be Exhibit 11. And it's Bates
13 numbered Miracle Hill Subpoena 6977. So this -- so
14 this is a -- an undated note that's signed by
15 Sharon Betts and it appears to be a summary of a
16 conversation that Miss Betts had with Miss Welch.

17 (EXHIBIT 11, Statement,
18 MIRACLE_HILL_SUBP_006977, was marked for
19 identification.)

20 BY MS. JANSON:

21 Q. Have you seen this document -- have you
22 seen this document before?

23 A. I don't recall having seen this
24 document.

25 Q. Okay. And in the document Miss Betts

1 writes that Miss Welch -- and this is approximately
2 a third of the way through the -- the big paragraph
3 on the page. Miss Welch said that she has a wife.
4 She said, does your website indicate what type of
5 families you work with? Would we be disqualified?
6 And then Miss Betts writes: I said, I am not sure
7 that is specifically addressed.

8 To your knowledge, Miss Busha, does
9 Miracle Hill work with same sex couples who are
10 interested in becoming foster parents?

11 A. It's my understanding they do not.

12 Q. So you're not aware of Miracle Hill
13 ever having worked with a same sex couple that was
14 interested in fostering?

15 A. I am not aware of any, that's correct.

16 Q. So that means Miracle Hill would not
17 work with a same sex couple even if that couple
18 signed on to Miracle Hill's doctrinal statement?

19 A. That's my understanding.

20 Q. Do you know whether Miracle Hill would
21 work with a lesbian, gay or bisexual individual?

22 MR. COLEMAN: Object to the form of the
23 question. This is Miles.

24 BY MS. JANSON:

25 Q. You can answer.

1 A. It's my understanding they would not
2 based on the practice of the doctrinal statement.

3 Q. Let's -- let's look back at the
4 doctrinal statement just for a minute if we can.
5 That was Exhibit 2. And it's the document with the
6 Bates number ending 375. If you were to take a
7 look at the doctrinal statement and then point me
8 to where -- to what it is in the doctrinal
9 statement that leads you to your understanding that
10 Miracle Hill would not work with lesbian, gay or
11 bisexual individuals as prospective foster parents.

12 A. I couldn't state on what Miracle
13 Hill -- which of these beliefs Miracle Hill would
14 identify as the reason they will not work with that
15 population.

16 Q. But it's -- nonetheless, it's your
17 understanding that Miracle Hill does not work with
18 lesbian, gay or bisexual individuals as well as
19 same sex couples, right?

20 MR. COLEMAN: Object to the form of the
21 question. This is Miles. You can answer.

22 THE WITNESS: As foster parents.

23 BY MS. JANSON:

24 Q. Okay. All right, let's look at Tab 22.
25 This is going to be Exhibit 12 and it's Bates

1 numbered Miracle Hill Subpoena 12572.

2 (EXHIBIT 12, E-mail chain dated 5/1/19
3 to Sharon Betts, Reid Lehman, Karen Busha and
4 Brenda Parks from Sandra Furnell,
5 MIRACLE_HILL_SUBP_012572 to 12573, was marked for
6 identification.)

7 BY MS. JANSON:

8 Q. So this is an e-mail chain, the top
9 e-mail which is from Sandra Furnell to Sharon
10 Betts, Reid Lehman, Karen Busha and Brenda Parks
11 dated May 1st, 2019. Do you recognize this
12 document?

13 A. Yes.

14 Q. Do you remember it from the time that
15 it was sent or from your preparation for the
16 deposition?

17 A. I recall it from the time it was sent.

18 Q. Okay. If you look at the first e-mail
19 in the chain on the second page of the document,
20 it's from Miss Betts and she writes: Please find
21 the latest version of our response letter to
22 Miss Welch/Miss Rogers. Your feedback is greatly
23 appreciated.

24 Do you know why Miss Betts was asking
25 for feedback on the response letter to Miss Welch

1 and Miss Rogers from this group?

2 A. No.

3 Q. Was it typical -- was it typical when
4 an applicant -- when Miracle Hill denied a foster
5 care applicant that Miss Betts would reach out to
6 this group for feedback?

7 A. There were times that they would reach
8 out to me to review documentation, but I can't
9 recall if it was related to the licensing of a
10 foster family.

11 Q. Okay. So you don't -- you don't have
12 an understanding of what it was about Miss Rogers'
13 and Miss Welch's application that led Miss Betts to
14 ask for feedback on her response from this group?

15 A. I can't speak for Miss Betts and the
16 motive that she had to send this to us.

17 Q. Okay. Do you -- did you, in fact,
18 provide any feedback to Miss Betts on the draft
19 response that she sent?

20 A. I don't recall giving any feedback.

21 Q. And in that same e-mail, the first
22 e-mail in this chain, Miss Betts writes we need to
23 get this out today and with an exclamation point
24 and today is written in in all capitals.

25 Do you know why there was a rush to get

1 the response out to Miss Rogers and Miss Welch on
2 May 1st of 2019?

3 A. I do not recall.

4 Q. Okay. All right. Let's look at Tab
5 21. This is going to be Exhibit 13 and it's Bates
6 marked Miracle Hill Subpoena 592. We're going to
7 mark this as Exhibit 13.

8 (EXHIBIT 13, E-mail dated 5/1/19 from
9 Sharon Betts, MIRACLE_HILL_SUBP_000592, was marked
10 for identification.)

11 BY MS. JANSON:

12 Q. It's an e-mail from Sharon Betts to
13 Miss Rogers and Miss Welch dated May 1st, 2019.
14 Have you seen this document before?

15 A. Yes.

16 Q. And when did you see this document?

17 A. I'm assuming May 1st of 2019.

18 Q. Did Miss Betts forward to you this
19 document on May 1st, 2019?

20 A. I don't recall if she only forwarded me
21 the draft copy or the finalized copy. I don't
22 recall.

23 Q. Okay. Did this appear to be the -- the
24 final response letter that was -- that was sent to
25 Miss Rogers and Miss Welch?

1 A. Yes.

2 Q. And in the second paragraph there
3 starting in the first sentence, Miss Betts writes:
4 You stated in your inquiry that you attend the
5 Unitarian Universalist Church and that you are in
6 agreement with our doctrinal statement.

7 Do you see that there?

8 A. Yes.

9 Q. And then it goes on to say: The
10 Unitarian Universalist Church, however, does not
11 align with traditional Christian doctrine and
12 thereby would not be considered a Christian church.

13 Do you see that?

14 A. Yes.

15 Q. Do you know whether Miracle Hill,
16 Miss Betts or anyone else at Miracle Hill conducted
17 any research into what the beliefs or the tenets of
18 the Unitarian Universalist faith were?

19 A. I do not know.

20 Q. Do you know how Miss Betts determined
21 that the Unitarian Universalist faith did not align
22 with traditional Christian doctrine?

23 A. I do not know.

24 Q. Do you have any view personally about
25 whether the Unitarian Universalist faith aligns

1 with traditional Christian doctrine?

2 A. I do not.

3 Q. She notes in that first sentence of the
4 e-mail that Eden -- that Miss Rogers and Miss Welch
5 were in agreement with Miracle Hill's doctrinal
6 statement, but, nonetheless, Miss Betts indicates
7 here that Miracle Hill's view was that the
8 Unitarian Universalist Church did not align with
9 traditional Christian doctrine, right?

10 A. That's what the letter states.

11 Q. So that suggests then that Miracle
12 Hill's view of the Unitarian Universalist faith
13 was -- was determinative here, right?

14 MR. COLEMAN: Object to the form of the
15 question. This is Miles.

16 THE WITNESS: I don't know how it was
17 determined.

18 BY MS. JANSON:

19 Q. Okay. What I'm trying to get at is
20 Miss Rogers and Miss Welch indicated in their -- on
21 their inquiry form that they were in agreement with
22 Miracle Hill's doctrinal statement, which as we've
23 discussed is a requirement for prospective foster
24 parents, but Miss Betts' e-mail indicates that
25 Miracle Hill had determined that the Universal --

1 Unitarian Universalist faith was not a
2 traditional -- did not align with traditional
3 Christian doctrine and that is the reason that she
4 cites for denying their application.

5 So my -- so my question is, is simply
6 does it appear to you from reading this e-mail and
7 from our discussion that Miracle Hill's view about
8 Miss Rogers' and Miss Welch's Unitarian
9 Universalist faith was determinative of the
10 decision that Miracle Hill made with regard to
11 their foster parent application, is that right?

12 A. I was not part of the discussion and
13 can't testify to that.

14 Q. Okay. Do you have an understanding as
15 to how Miracle Hill would have treated Miss Rogers'
16 and Miss Welch's application if they had said that
17 they attended a Protestant church, say a Methodist
18 church?

19 MR. COLEMAN: This is Miles. Object to
20 the form of the question.

21 BY MS. JANSON:

22 Q. I can rephrase it if that would be
23 helpful.

24 If Miss Rogers and Miss Welch had
25 indicated in their inquiry form that they attended

1 a Methodist church, for example, and they said that
2 they agreed with Miracle Hill's doctrinal statement
3 and everything else about their application was the
4 same, would -- is it your understanding that
5 Miracle Hill would have accepted their application?

6 MR. COLEMAN: Same objection.

7 THE WITNESS: I would need to rereview
8 the inquiry.

9 BY MS. JANSON:

10 Q. Okay. That was -- let's see. Looking
11 back, that was a document that we marked as Exhibit
12 10 that ends in Bates Number 593. If you want to
13 go back and take a look at that, you can do that
14 now.

15 A. My understanding is that Miracle Hill
16 would not have accepted the inquiry because they
17 were not living in accordance to the doctrinal
18 statement that they agreed with.

19 Q. And what -- what do you mean when you
20 say they weren't living in accordance with the
21 doctrinal statement?

22 A. They indicate that they are a same sex
23 couple.

24 Q. And is it right that Miracle Hill's
25 doctrinal statement states that God's design for

1 marriage is the legal joining of one man and one
2 woman in a lifelong covenant relationship?

3 A. We believe God's design for marriage is
4 a legal joining of one man and one woman in a
5 lifelong covenant relationship is the Miracle Hill
6 doctrine statement.

7 Q. And so do you have -- so if we look
8 back at Exhibit 13, which is the response letter to
9 Miss Rogers and Miss Welch that we just had in
10 front of us with the Bates Number 592 at the
11 bottom, does that -- does this response letter say
12 anything about Miss Rogers and Miss Welch being a
13 same sex couple?

14 A. It does not.

15 Q. Do you have any understanding of why
16 that was not included in the response letter of the
17 reason for why Miss Welch and Miss Rogers'
18 application was rejected?

19 A. I do not.

20 Q. Do you know whether there was ever
21 discussion among Miss Betts or others at Miracle
22 Hill about whether to include something in this
23 response letter about Miss Welch and Miss Rogers
24 being a same sex couple?

25 A. I was not part of that conversation.

1 Q. But do you know whether there were
2 conversations on that topic, among others?

3 A. I referred them to legal counsel.

4 Q. You referred who to legal counsel?

5 A. Miss Parks when she brought the
6 information to me.

7 Q. I'll go back. At some point Miss Parks
8 came to you with questions about Miss Welch's and
9 Miss Rogers' application?

10 A. Yes.

11 Q. And what were -- what were those
12 questions that she had?

13 A. The questions were that she had
14 received an inquiry from a couple who were part of
15 the Unitarian church and a same sex couple.

16 Q. And -- and so what was she looking for
17 guidance on?

18 A. How to respond to the inquiry.

19 Q. And what did you tell her to do?

20 A. To contact Sandy Furnell, the
21 communication director, and to have her contact our
22 attorney, Miles Coleman.

23 Q. Do you know whether --

24 A. And Mr. Reid Lehman.

25 Q. Do you know whether Miss Parks actually

1 contacted Miss Furnell?

2 A. I'm assuming from the written
3 communication we have here that she did.

4 Q. But you don't know for sure?

5 A. I was not with her to witness her
6 contacting Miss Furnell.

7 Q. Do you have any understanding of what
8 Miss Furnell might have told Miss Parks with regard
9 to Miss Rogers' and Miss Welch's application?

10 MR. MATTHEWS: I'll object to the
11 question to the extent that it may be seeking
12 attorney/client privileged information. We haven't
13 established yet whether or not any such
14 conversations included legal counsel, but we
15 know -- do know that they may have.

16 To the extent that the witness knows
17 that those communications occurred outside of the
18 presence of legal counsel, she's free to answer the
19 question; but to the extent that they may have
20 included legal counsel, asserting privilege and
21 directing the client not to respond.

22 MS. JANSON: So Miss -- Miss Furnell is
23 not a lawyer, right?

24 MR. MATTHEWS: Correct. But we don't
25 know if Miss -- if the communication was with

1 Miss Furnell or was with Miss Furnell and
2 Mr. Coleman. If the witness has knowledge of
3 conversations that occurred outside of the presence
4 of legal counsel, she's free to answer questions
5 about that.

6 But right now, we're in an area where
7 it appears that the conversations may have included
8 Miss Furnell and Mr. Coleman pursuant to the
9 witness' instructions to Miss Parks.

10 BY MS. JANSON:

11 Q. Okay. Well, let's back up a bit.
12 Miss Busha, do you know whether Miss Parks, in
13 fact, contacted Miss Furnell about her questions
14 regarding Miss Rogers' and Miss Welch's
15 application?

16 A. I did not witness her contacting
17 Miss Furnell, but I believe that she did contact
18 Miss Furnell.

19 Q. Okay.

20 A. Because of the e-mail communication
21 that you presented to me.

22 Q. And do you have any understanding of
23 what was discussed between Miss Parks and
24 Miss Furnell?

25 A. No. I was not present.

1 Q. Do you know whether Miss Parks
2 contacted Mr. Lehman with her questions regarding
3 Miss Rogers' and Miss Welch's application?

4 A. I do not know who she contacted.

5 Q. Okay. All right. Let's shift gears a
6 little bit and turn to a new topic.

7 In -- Miss Busha, in your experience at
8 Miracle Hill, did Miracle Hill provide any
9 religious instruction to the children that live --
10 that resided in its group homes?

11 MR. COLEMAN: This is Miles. Object to
12 the form of the question.

13 THE WITNESS: The group homes typically
14 provided devotionals, but children had the ability
15 to opt out of those if they weren't comfortable in
16 attending.

17 BY MS. JANSON:

18 Q. What is a devotional?

19 A. I do not -- I didn't see the devotions
20 that they provided. Typically a devotion would
21 include a reading of scripture and some type of
22 encouragement.

23 Q. What do you mean by some type of
24 encouragement?

25 A. Some type of positive encouragement,

1 something uplifting to help the children feel
2 valuable, worthy, but I don't -- I didn't see the
3 devotional material, so I can't speak to exactly
4 what was shared for the children who wanted to
5 attend.

6 Q. Okay. Do you know -- was it -- who was
7 it at Miracle Hill that would have led that
8 devotional time?

9 A. At the Miracle Hill Children's Home, it
10 would primarily be the house parents. In the Boys'
11 Shelter and Homes for Life, it would probably be
12 one of the staff members.

13 Q. Did -- to your knowledge were the
14 children who resided at Miracle Hill Children's
15 Home or the Boys' Shelter or Homes for Life brought
16 to worship services?

17 A. They could attend worship services.
18 They also had the option to opt out of worship
19 services.

20 Q. And if they chose to attend, what --
21 what services were those? What church did they go
22 to?

23 A. I don't know the churches they
24 attended.

25 Q. Okay. Apart from the devotion time

1 that we discussed, was there -- and the opportunity
2 to attend worship services, were there other
3 religious instruction that was -- that was provided
4 to or offered to the children in Miracle Hill's
5 group homes?

6 A. I wasn't there, so I'm not sure
7 exactly -- I can't testify that exactly what was --
8 what was done.

9 Q. Okay. Do you know whether Miracle Hill
10 required consents from a child's family of origin
11 before encouraging or offering the child the
12 opportunity to participate in religious
13 instruction?

14 A. I don't know.

15 Q. You don't know whether consent --
16 whether consent was -- was sought from the family
17 of origin?

18 A. I do not know with regard to the family
19 of origin.

20 Q. Okay. Did Miracle Hill offer religious
21 instruction to the children in its group homes
22 unless there was a specific objection from the
23 family of origin?

24 A. Or the child.

25 Q. Or the child. Okay. And to your

1 knowledge was Miracle Hill legally obligated to
2 honor the wishes of the family of origin when it
3 comes to religious instruction of children in its
4 group homes?

5 A. I know that we honored requests. I
6 don't know the legalities of that.

7 Q. Okay. Can you give me an example of a
8 time that you remember when Miracle Hill honored
9 the request of a family of origin with respect to
10 religious instruction?

11 A. Yes. At the Miracle Hill's children
12 home, we did have a parent that did not want her
13 child going to -- I'm trying to remember. She did
14 not want her child going to a Christian church. I
15 can't remember where she wanted her child to go. I
16 remember that we accommodated taking the child to
17 wherever her mother wanted her to attend a
18 religious service. I just can't remember what the
19 religious service was. Her staff took her to
20 wherever the mother wanted her to go.

21 Q. Okay. Why don't we look at Tab 41.
22 This is going to be Exhibit 14. Its Bates numbered
23 Miracle Hill Subpoena 6206. And this is an e-mail
24 thread that begins with a message that Miss Busha
25 forwarded to herself on November 26th of 2019.

1 (EXHIBIT 14, E-mail chain dated
2 11/26/19 to Karen Busha from Karen Busha,
3 MIRACLE_HILL_SUBP_006206 to 006211, was marked for
4 identification.)

5 BY MS. JANSON:

6 Q. After you've had a chance to take a
7 look at that, just let me know whether -- whether
8 you recognize this e-mail chain. So do you
9 recognize this e-mail chain?

10 A. Yes.

11 Q. And if you look down at the first
12 e-mail in the chain, you're sending a message on
13 Tuesday, November 26, 2019 to Bradley Holland,
14 Steven Hicks, Kristie Ballentine and Michelle
15 Hamilton. Who is -- who is Bradley Holland?

16 A. He was the director of the Miracle Hill
17 Children's Home.

18 Q. And who was Steven -- who is Steven
19 Hicks?

20 A. He was a staff member at the children's
21 home.

22 Q. And how about Kristie Ballentine?

23 A. Kristie Ballentine was also a staff
24 member at the children's home.

25 Q. All right. And what about Michelle

1 Hamilton?

2 A. And Michelle Hamilton was as well a
3 staff member.

4 Q. Okay. Great. And in that e-mail, a
5 few paragraphs down at the second paragraph on the
6 last page of the chain you write: So we are all --
7 so we are all on the same page regarding the
8 children of Catholic faith. We will respect the
9 wishes of the mother conveyed through her attorney
10 and accommodate mass for her children. In
11 addition, based on her preference, they are not, in
12 capitals and underlined, to be taken to a church
13 outside the Catholic faith. The mother has made
14 her wishes clear and to do otherwise puts us at
15 risk due to the contact.

16 Is that last word in that -- in that
17 paragraph, was that supposed to read contract?

18 A. Yes.

19 Q. Okay. And it sounds like from what you
20 have written there that there was a situation where
21 the mother of a -- of children in Miracle Hill's
22 care objected to their children -- her children
23 being taken to a church other than the Catholic
24 church, is that -- is that a fair interpretation?

25 A. Yes. Yes.

1 Q. Is this the same example that you
2 were -- you were remembering before?

3 A. Yes.

4 Q. Obviously without disclosing the
5 identities of the people involved here, can you
6 tell me anything more about what you remember
7 regarding this particular situation?

8 A. Based on what I wrote, it appears that
9 I was in a meeting with them. And if I understood
10 correctly, that they were taking all children to
11 church regardless of their preferred preference.
12 And if my memory serves me correctly, it was a
13 house parent, not these staff members, but a house
14 parent had been taking all the children in the
15 cottage to the same church.

16 Q. Okay. Do you -- do you know how it was
17 that the mother of these children discovered that
18 her children were being taken to religious services
19 without her consent?

20 A. The child told the mother on a visit.

21 Q. Okay.

22 A. Is my recollection.

23 Q. And in your e-mail that we were just
24 looking at, you write: If I understood correctly
25 yesterday that we make, in quotes, all kids go to

1 church regardless of their preference, then we are
2 practicing outside the contract by forcing a child
3 to attend a church outside their faith -- faith
4 preference. In addition, if we have children who
5 voice unbelief and do not want to attend church,
6 based on the contract we cannot force them to
7 attend.

8 What is the contract that you're
9 referring to there?

10 A. The contract with the Department of
11 Social Services.

12 Q. And that's a contract that Miracle Hill
13 enters into with DSS to provide foster care
14 services?

15 MR. MATTHEWS: Object to the form of
16 the question.

17 THE WITNESS: This was -- this was a
18 contract Miracle Hill entered in with DSS to
19 provide residential services.

20 BY MS. JANSON:

21 Q. Okay. In that -- in that paragraph
22 that I just read from, you said if I understood
23 correctly yesterday. Do you remember what it was
24 that happened the day before you wrote this e-mail
25 that you're referring to there?

1 A. It appears I had a meeting with these
2 four staff members.

3 Q. Okay. Is it -- is it your
4 understanding from your time at Miracle Hill that
5 Miracle Hill considers it part of its religious
6 mission to make children attend church?

7 A. No, it is not -- it was not our
8 practice to make children attend church.

9 Q. But judging from the e-mail we were
10 just looking at -- we were just looking at, it
11 seems like that's what was happening at the Miracle
12 Hill Children's Home, doesn't it?

13 MR. COLEMAN: This is Miles. Object to
14 the form of the question.

15 THE WITNESS: My recollection is that
16 there was a house parent -- house parents took the
17 children to church that was requiring all the
18 children in the cottage to go to church.

19 BY MS. JANSON:

20 Q. Was it -- was it Miracle Hill's policy
21 to require the children that lived in its
22 residential homes to go to church absent an
23 objection from their families of origin?

24 MR. COLEMAN: This is Miles. Object to
25 the form of the question.

1 THE WITNESS: Can you repeat the
2 question, please?

3 BY MS. JANSON:

4 Q. Sure. Was it Miracle Hill's policy to
5 require the children that lived in its residential
6 homes to go to church unless there was an objection
7 from their family of origin?

8 A. I don't recall it being in policy.

9 Q. Was it a practice?

10 A. It was a practice to offer -- offer
11 children church services on Sunday while they were
12 in residential care, yes.

13 Q. Were they encouraged to attend church
14 services?

15 A. They were offered the opportunity to
16 attend church services.

17 Q. But you don't know whether they were
18 encouraged to attend the church services?

19 A. I -- I don't know.

20 Q. And what was it -- what was it
21 specifically about the contract -- Miracle Hill's
22 contract with DSS that you referenced in this
23 e-mail that's Exhibit 14 that led you to make the
24 statement here that if we make all kids go to
25 church regardless of their preference, we are

1 practicing outside the contract?

2 MR. MATTHEWS: Object to the form of
3 the question in that it's asking the lay witness
4 for a legal -- legal opinion, but you're free to
5 answer the question.

6 MR. COLEMAN: This is Miles. I also
7 object to the form and relevance of the question
8 for residential foster care.

9 BY MS. JANSON:

10 Q. I'm just looking for what -- what the
11 basis was for your statement in this e-mail that
12 you wrote where you said that if we make all kids
13 go to church regardless of their preference, we are
14 practicing outside the contract.

15 A. I would have to see the contract to
16 know what I was referencing.

17 Q. You don't have any recollection of what
18 it was in the contract that you were referring to
19 there?

20 A. There is obviously something in the
21 contract regarding religious activities for
22 children, but I don't recall what it is without
23 seeing the contract.

24 Q. Okay. Looking back at that same e-mail
25 that is Exhibit 14, further up in the chain on the

1 page that's marked Bates Number 6207. This is an
2 e-mail from Mr. Holland on November 26, 2019. And
3 he's writing just to you in response to your e-mail
4 that we had been looking at previously. And about
5 I think it's the fourth paragraph down on 6207 --

6 MR. MATTHEWS: Kate, we're just --

7 MS. JANSON: Sure.

8 MR. MATTHEWS: I apologize. We're
9 looking for this document.

10 BY MS. JANSON:

11 Q. Okay. And then -- so he writes: We
12 may limit our staff's ability to worship with this
13 decision. We are breaking with program and as I
14 understand it MHM, Miracle Hill Ministries,
15 practices.

16 Do you have an understanding of what he
17 means when he says we are breaking with program and
18 as I understand it Miracle Hill Ministries
19 practices?

20 A. Can you repeat the question, please?

21 Q. Sure. My question was whether you have
22 an understanding of what Mr. Holland meant when he
23 wrote we are breaking with program and as I
24 understand it Miracle Hill Ministries practices.

25 A. I don't -- I don't understand why

1 Mr. Holland wrote that or what he believed.

2 Q. Does it -- does that statement suggest
3 that it had, in fact, been Miracle Hill's practice
4 to insist that the children in its group homes
5 attend religious services?

6 MR. MATTHEWS: Object to the form of
7 the question.

8 And, Miss Brusseau, I apologize. I've
9 not been identifying myself. Miles has been good
10 about identifying himself. So if you have previous
11 objections with no name on it, it's probably me.

12 COURT REPORTER: That's what I thought.
13 Thank you.

14 THE WITNESS: My understanding from my
15 employment was that children had a choice, and that
16 was the practice of Miracle Hill. I cannot speak
17 to Mr. Holland's practice.

18 BY MS. JANSON:

19 Q. If you look -- if you look in the next
20 paragraph down, he writes -- in the same e-mail he
21 writes: I have been working with Steve this
22 morning on how we are going to accommodate this
23 request.

24 And is the Steve that he's referring to
25 there Mr. Hicks?

1 A. Yes.

2 Q. And he was a staff member at the
3 children's home, right?

4 A. Yes. He supervised the house parents.

5 Q. And then Mr. Holland writes: If the
6 mother is not okay with this as an option, then I
7 respect her decision. It will be up to DSS to
8 place the children in the best option available.

9 Do you see that there?

10 A. Yes.

11 Q. Do you -- do you have an understanding
12 of what Mr. Holland meant by that?

13 A. I can't speak for what he meant. I can
14 only read what he stated.

15 Q. Do you understand him to be suggesting
16 that DSS would need to find another CPA to care for
17 these children if the mother did not want Miracle
18 Hill to take her children to religious services
19 outside the Catholic faith?

20 MR. COLEMAN: This is Miles. Object to
21 the form of the question.

22 THE WITNESS: His statement was that it
23 would be up to DSS to place the children in the
24 best option available.

25 BY MS. JANSON:

1 Q. Has -- to your knowledge, had -- did
2 Miracle -- had Miracle Hill when it operated its
3 group homes ever declined to care for a child in
4 one of its group homes because the child's family
5 objected to the child attending Miracle Hill's
6 religious services?

7 A. I did not have knowledge of that.

8 Q. You don't know whether -- you don't
9 know whether that ever happened or you believe that
10 it never happened?

11 A. I don't know if it ever happened.

12 Q. Do you -- do you personally, do you
13 agree that that would be the appropriate course for
14 Miracle Hill to take if a family of origin objected
15 to its child's being exposed to Miracle Hill's
16 religious teachings?

17 MR. MATTHEWS: Object to the form of
18 the question in reference to that that would be the
19 appropriate course. I'm not sure what that refers
20 to.

21 BY MS. JANSON:

22 Q. I can clarify. If -- if a family of
23 origin objected to a child being -- a child in a
24 Miracle Hill group home being exposed to Miracle
25 Hill's religious teachings, would the appropriate

1 course for Miracle Hill to take be to decline to
2 care for the child and ask for DSS to find another
3 CPA?

4 A. No.

5 Q. What do you think would be the
6 appropriate course for Miracle Hill to take in that
7 circumstance?

8 A. To respect and accommodate the wishes
9 of the parent and the child.

10 Q. And in your -- in your reply to
11 Mr. Holland on Exhibit 14, the page marked 6206,
12 that's the first page there, first paragraph, you
13 write at the bottom: We accept children of all
14 faiths into care at Miracle Hill Ministries and
15 this mother's request should not disrupt their
16 placement. We are in no way changing who we are,
17 but rather we are respecting religious differences
18 among our children and their families' preference.

19 So that's con -- that's consistent with
20 what you said about Miracle Hill respecting and
21 accommodating the wishes of the parent and the
22 child, right?

23 A. Yes.

24 Q. And as you say here in the e-mail, it,
25 quote, in no way changes who Miracle Hill is to

1 respect religious differences among the children in
2 Miracle Hill's care, right?

3 A. That's correct. Accommodating other
4 religious beliefs did not change what Miracle Hill
5 was.

6 Q. So to your knowledge then, why does
7 Miracle Hill refuse to work with prospective foster
8 parents who practice a different faith?

9 A. I can't speak to Miracle Hill's
10 decisions or how they operate their business.

11 Q. Do you have -- do you have an opinion
12 or a personal view as to why Miracle Hill refuses
13 to work with prospective foster parents who
14 practice a different faith?

15 A. Miracle Hill is a private religious
16 organization and they want to operate with people
17 of like faith is my understanding, but I can't
18 speak for the minister.

19 Q. So what I'm trying to understand is if
20 you're clear in this e-mail that Miracle Hill
21 respects religious differences among the children
22 that are under its care and yet Miracle Hill when
23 it comes to folks that are interested in serving as
24 foster parents, Miracle Hill requires that those
25 people follow the same religious beliefs and the

1 same faith as Miracle Hill, do you have an opinion
2 or an understanding as to why those two things are
3 treated differently?

4 A. No.

5 MR. MATTHEWS: Object to the form of
6 the question. I'm sorry, this is Steve Matthews
7 again.

8 BY MS. JANSON:

9 Q. And then you write a couple paragraphs
10 down in the e-mail: As for devotions at Miracle
11 Hill Children's Home, nothing changes. Any child
12 who does not want to actively participate can sit
13 quietly during those times.

14 And then: In the rare incident that
15 you have a family contact you and object based on
16 their faith, please let me know so we can staff
17 with Ken to determine the best plan for the child.

18 So this is talking about the devotions
19 that we -- that we spoke about a little bit
20 earlier, right?

21 A. Yes.

22 Q. And this suggests that children who did
23 not want to actively participate could sit quietly
24 during those times, but it sounds like they still
25 had to attend the devotional time, is that right?

1 A. These are home -- the facility was a
2 home life setting, so you could sit quietly without
3 sitting in the devotion area.

4 Q. Do you know whether Miracle Hill ever
5 had a family object to their child or their
6 children attending these daily devotions?

7 A. I don't recall.

8 Q. Okay. We can put -- we can put that
9 one aside for now. Let's mark Tab 42 as Exhibit 15
10 I think we're on. And this is marked Miracle Hill
11 Subpoena 6220. It's an e-mail from Miss Busha to
12 Mr. Holland dated November 26, 2019.

13 (EXHIBIT 15, E-mail dated 11/26/19 to
14 Bradley Holland from Karen Busha,
15 MIRACLE_HILL_SUBP_006220, was marked for
16 identification.)

17 BY MS. JANSON:

18 Q. Just let me know if you recognize this
19 document.

20 A. Yes.

21 Q. And it looks like this was -- this
22 e-mail was sent November 26, 2019, which is the
23 same day as the prior exhibit that we were just
24 discussing, right?

25 A. I'm sorry, what was the question?

1 Q. This e-mail that we're looking at,
2 Exhibit 15, is dated November 26, 2019. Is that
3 the same day as the prior exhibit that we were
4 looking at, Exhibit 14, the prior e-mail chain?

5 A. Yes.

6 Q. Okay. So you sent a separate e-mail to
7 Mr. Holland on that same day. It appears to be
8 generally related to the same topic that we are now
9 discussing, right?

10 A. Yes.

11 Q. And it -- the subject line reads:
12 Placement disruption. And you wrote: Miracle Hill
13 Ministries' stance on their being placed with us is
14 in bold on our -- on our website under foster care.
15 The page was designed to emphasize that we do not
16 discriminate against children coming into care.
17 I'm not sure what MHCH has done in the past, but my
18 understanding is that this is our stance at the
19 present time. So Catholic children needing
20 accommodations for mass would have nothing to do
21 with their being placed at MHCH.

22 Do you see that there?

23 A. Yes.

24 Q. And in the first line there where it
25 says MHM stance on their being placed with us, is

1 this talking about the children whose -- the
2 Catholic children whose mother had objected to
3 their being -- to her children being taken to
4 churches outside the Catholic faith?

5 A. Yes, that's what this is referring to.
6 Or any other child that would need an accommodation
7 for religious purposes.

8 Q. Okay. And you write in the section
9 that I read: I'm not sure what MHCH has done in
10 the -- has done in the past.

11 Did you ever find out whether at some
12 time before this, before November of 2019, it had
13 been the practice at Miracle Hill Children's Home
14 to discriminate against nonProtestant children
15 residing at the home?

16 A. No.

17 Q. No, you didn't find out or no, they
18 didn't do that?

19 A. No, I did not find out.

20 Q. Okay. Do you know whether Miracle Hill
21 ever tried to -- Miracle Hill Children's Home ever
22 tried to find a different placement for a child
23 because his or her family of origin did not want
24 them to attend Miracle Hill's religious services?

25 A. Can you repeat the question, please?

1 Q. Sure. Do you know whether Miracle Hill
2 ever -- Miracle Hill Children's Home, sorry, ever
3 tried to find a different placement for a child
4 because the child's family of origin did not want
5 them to attend Miracle Hill's religious services?

6 A. I am not aware of that during my tenure
7 with Miracle Hill.

8 Q. Okay. So the next document I want to
9 look at is Tab 43. It's going to be Exhibit 16 and
10 it's Bates marked Miracle Hill Subpoena 6221. And
11 this is going -- this is an e-mail from Miss Busha
12 to Bradley Holland dated November 27th, 2019. The
13 subject line reads re followup and a bit more
14 context for Catholic request.

15 (EXHIBIT 16, E-mail chain dated
16 11/27/19 to Bradley Holland from Karen Busha,
17 MIRACLE_HILL_SUBP_006221 to 006222, was marked for
18 identification.)

19 BY MS. JANSON:

20 Q. Just let me know if you recognize the
21 e-mails.

22 A. Yes.

23 Q. And, let's see. In Mr. Holland's
24 e-mail, 10:45 AM part way down the page there, he
25 writes: We have planned to transport to Catholic

1 service once per week and for them to remain home
2 during Sunday church.

3 To your recollection, is that, in fact,
4 how the situation we've been discussing with the
5 Catholic children was resolved?

6 A. What's the question again?

7 Q. To your -- to your recollection, was
8 this, in fact, how the situation we've been
9 discussing with the Catholic children how it was
10 resolved?

11 A. Yes. The children were taken -- the
12 children were to be taken to the Catholic service
13 as requested and to remain home during Sunday
14 church services.

15 Q. Okay. Do you remember -- from your
16 time at Miracle Hill, do you remember any other
17 situations in which a child's parent objected to
18 his or her attending church services with -- with
19 Miracle Hill?

20 A. I don't recall any other situations
21 other than this one.

22 Q. Okay. Do you know whether Miracle Hill
23 has a formal policy regarding religious instruction
24 of children -- or had, I should say, a formal
25 policy regarding religious instruction of children

1 in its group home?

2 A. I believe the instructions were
3 included in the operational manual for the ministry
4 for the children's home.

5 Q. Okay.

6 A. But I'm not certain without seeing the
7 manual.

8 Q. And then just a couple more questions
9 on this one. Mr. Holland writes a couple sentences
10 down, it looks like two names: Redacted and
11 redacted are the two boys involved in this
12 decision. Both professed faith in Christ while
13 attending church with house parents. Blank asked
14 his mother's permission to be baptized, which is
15 what triggered the response from mother.

16 The names are redacted there, but it
17 looks like next to each name there's a dash and
18 then a number, dash 9 and dash 8. Do you know
19 whether the 8 and the 9 are the children's ages?

20 A. I do not know.

21 Q. Okay. And it looks like from this one
22 of the children -- one of the boys asked his mother
23 to be baptized after attending Miracle Hill's
24 religious services, right?

25 MR. COLEMAN: Object to the form of the

1 question.

2 THE WITNESS: They did not attend
3 Miracle Hill religious organization -- services.
4 Miracle Hill's services.

5 BY MS. JANSON:

6 Q. Okay. What I mean is after
7 attending -- after attending church -- I mean,
8 Mr. Holland says in his e-mail: Both professed
9 faith in Christ while attending church with house
10 parents.

11 So my question -- I'm just confirming
12 what's in the e-mail. One of the children asked
13 his mother to be baptized after he had attended
14 church with Miracle Hill house parents, is that
15 right?

16 A. Yes. The children had been attending
17 church with the house parents. The children had
18 not objected to attending church.

19 Q. Okay. Do you know whether Miracle Hill
20 would encourage the children at its group homes to
21 get baptized?

22 A. I do not know that they would encourage
23 children to get baptized.

24 Q. In your response to Mr. Holland at the
25 top of the page here, you write: If you have a

1 staff adamant they cannot go with them to mass,
2 please accommodate their request. We do that with
3 licensed foster parents. Staff not comfortable are
4 accommodated.

5 When you say -- sorry. Do you know
6 whether staff at the -- at the Miracle Hill
7 Children's Home ever refused to take children to
8 different church services that they had -- that
9 their family origin had requested that they be
10 taken to?

11 A. I don't recall -- I don't recall if a
12 staff member was uncomfortable going to the mass or
13 if they thought the staff member would be
14 uncomfortable going to mass.

15 Q. Okay. And then you also -- you also
16 write there: We do that with licensing foster
17 parents. Staff not comfortable are accommodated.

18 What did you mean by that?

19 A. So if a staff member is not
20 comfortable, then we wouldn't require the staff
21 member to go. We would use another staff member
22 that was comfortable.

23 Q. Okay. So that -- so were there -- were
24 there times then after Miracle Hill changed its
25 policy to start working with Catholic prospective

1 foster parents that staff members expressed
2 discomfort with working with the Catholic
3 applicants?

4 A. I wasn't party to those conversations
5 with the foster care staff and their supervisors.

6 Q. But you're -- the point that you're
7 making in this e-mail is that to the extent staff
8 were not comfortable working with Catholic
9 prospective foster parents, the preference -- those
10 preferences of the staff would be accommodated, is
11 that right?

12 MR. COLEMAN: Object to the form of the
13 question. This is Miles.

14 THE WITNESS: The point of my e-mail is
15 that if a staff member was not comfortable taking a
16 child to mass, we would -- we would not require the
17 staff member to go with the child, but we would
18 still accommodate the child.

19 BY MS. JANSON:

20 Q. Right. I understand that. I'm looking
21 at the second -- the second piece of this where
22 you're referring to licensing foster parents. And
23 I'm just trying to understand whether what you're
24 saying here is that Miracle Hill staff who were not
25 Miracle Hill licensing staff who were not

1 comfortable working with Catholic prospective
2 foster parents would -- would be accommodated such
3 that somebody else would work with those
4 prospective foster parents, is that right?

5 A. We do that with licensing. I'm reading
6 what I wrote and trying to understand what I meant.

7 Q. Sure.

8 A. My best guess is that what I meant was
9 if we had a licensing staff that was uncomfortable
10 working with a -- with a Catholic applicant, then
11 we would use a licensing staff that was
12 comfortable.

13 Q. Okay. I -- I'm almost -- I just have
14 one -- a couple more questions before we switch
15 topics, so why don't I just finish up this one
16 section and then we can talk about taking another
17 break.

18 Did -- with respect to the children in
19 Miracle Hill's group homes when -- when it had
20 them, did Miracle Hill provide mentors for those
21 children?

22 A. We did provide mentors for children
23 wanting mentors.

24 Q. Okay. And how did Miracle Hill find
25 people to be mentors to the children in its group

1 homes?

2 A. I believe our mentors were referred to
3 us through Fostering Great Ideas to our liaison at
4 Miracle Hill who worked directly with foster -- who
5 worked directly with the mentoring process with
6 Fostering Great Ideas.

7 Q. So what is -- what is Fostering Great
8 Ideas? Is that a separate organization?

9 A. Yes, it is.

10 Q. And is that an organization that
11 recruits people to be mentors for children in
12 foster care?

13 A. That's one of the things that they do,
14 yes.

15 Q. Would -- so who would be -- who would
16 be responsible for matching up the children in
17 Miracle Hill's group homes who wanted mentors with
18 mentors?

19 A. Beth Sevilla.

20 Q. And do you know whether -- whether she
21 would or others involved in the process would try
22 to match children with mentors who shared their
23 same faith?

24 A. I don't know the process that she used
25 to match mentors.

1 Q. Do you know whether -- whether the
2 children or their families of origin would ever
3 request the mentor be of a specific faith?

4 A. I don't know.

5 Q. One more document I just want to take a
6 look at quickly. This is going to be Exhibit 17, I
7 believe. And, Serena, this is Tab 7. It's Bates
8 numbered Miracle Hill Subpoena 1319. And this is
9 an e-mail thread from -- from Marques Petty to Beth
10 Williams and others dated January 4th, 2018?

11 (EXHIBIT 17, E-mail chain dated 1/4/18
12 to Lisa Yerrick from Marques Petty,
13 MIRACLE_HILL_SUBP_001319 to 001323, was marked for
14 identification.)

15 MR. MATTHEWS: I'm sorry, Kate, could
16 you hold just one moment? I'm having trouble
17 locating it. Thank you. Sorry about that. Thank
18 you.

19 BY MS. JANSON:

20 Q. Just take a look at that and let me
21 know if -- if you've seen this e-mail before, if
22 you recognize this.

23 A. Not until you sent it to Mr. Matthews.

24 Q. Okay. If you look at -- if you look on
25 the page labeled 1320, the bottom of that page is

1 an e-mail from Beth Williams. And she writes: I
2 sent instruction last week regarding, and the name
3 is redacted, mentoring the child, see below. I am
4 confused that staff are now stating that a pastor
5 is going through the process.

6 And it appears to me if you look
7 farther down in the e-mail chain that the child
8 that Miss Williams is referring to here was Muslim.
9 Is that -- am I interpreting that correctly as you
10 look at this?

11 A. I can't interpret someone else's
12 e-mails.

13 Q. Do you have any -- do you have any
14 familiarity or any recollection of the situation
15 that's being discussed in this e-mail chain?

16 A. I was not employed at Miracle Hill
17 during this time.

18 Q. Okay. This was before you started in
19 August of 2018?

20 A. That's correct.

21 Q. Okay. Fair enough. So we've been --
22 we've been discussing Miracle Hill's group homes.
23 With respect to the foster families that Miracle
24 Hill works with, does Miracle Hill in your
25 experience encourage those families to provide

1 Evangelical Protestant religious instruction to
2 foster children that are placed with them?

3 A. I'm not aware of encouraging foster
4 parents to provide religious instruction.

5 Q. Okay. Do you know whether -- whether
6 foster families are -- Miracle Hill foster families
7 are supposed to respect the wishes of a foster
8 child's family of origin with respect to the
9 child's faith?

10 A. Yes, they are.

11 Q. Are they -- are the foster families
12 supposed to make sure that the -- that the children
13 can attend services at a -- at a house of worship
14 of their faith?

15 A. Yes.

16 Q. Do you know whether if a foster child's
17 family of origin does not express a particular
18 preference as to faith, can a foster family expose
19 the child to its own religion?

20 A. If that's part of the family's routine,
21 yes, they can carry the child with them.

22 Q. They can take the child to a church
23 with them, for instance?

24 A. That's my understanding.

25 Q. And does Miracle Hill encourage the

1 foster families that it works with to do that?

2 A. I don't know that Miracle Hill
3 encourages foster families to take children to
4 church. I don't know if the foster care staff did
5 that.

6 MS. JANSON: Okay. So we've been going
7 awhile now. It's about ten after 12:00. I don't
8 know whether it would be a good time to take a
9 slightly longer break for lunch or what your
10 preference is, Miss Busha or Steve, as to how we
11 proceed.

12 MR. MATTHEWS: Do you have any idea
13 about how much more you've got to do?

14 MS. JANSON: I would say that just
15 judging from my outline, I'm, you know, well past
16 halfway, maybe two-thirds of the way through, but,
17 you know, I don't know to what extent others will
18 have -- have questions as well.

19 MR. MATTHEWS: Why don't we go ahead
20 and take a break for lunch since it's after 12:00
21 and then we'll just reconvene after lunch.

22 MS. JANSON: Okay. About how long do
23 you guys want to take?

24 MR. MATTHEWS: Do you want to say until
25 1:15? Will that work for you all, 1:15?

1 MS. JANSON: That's fine by me. All
2 right. Great. We'll reconvene at 1:15.

3 MR. MATTHEWS: Great.

4 VIDEO TECHNICIAN: The time is 12:10
5 PM. We are going off the record.

6 (A luncheon recess transpired.)

7 VIDEO TECHNICIAN: The time is 1:17 PM.
8 We are back on the record.

9 BY MS. JANSON:

10 Q. So, Miss Busha, I just have a few
11 follow-ups to some of the topics we were talking
12 about before and then we'll move on to something
13 new.

14 To your knowledge, did Miracle Hill
15 make children's families aware that its group homes
16 would take the children to church and invite them
17 to participate in -- in devotions?

18 A. I'm not aware.

19 Q. You're not aware of whether Miracle
20 Hill informed the parents of the children and its
21 group homes of that?

22 A. Yes, I'm not aware of whether or not we
23 did that.

24 Q. Okay. Do you know whether DSS was
25 aware that it was a practice in Miracle Hill's

1 group homes to take children to church and to
2 invite them to participate in daily devotions?

3 A. I'm not aware.

4 Q. I would like to mark as an exhibit, see
5 if I can tell, I think we're up to 18, but Serena
6 will tell me if I've got that wrong.

7 Serena, this is going to be that Tab
8 51. This is a document that I did not -- I did not
9 send to you in advance. I'm just going to share my
10 screen so you can see it. It's from Miracle Hill's
11 website, so it's likely something that you're
12 familiar with, so let me just -- let me just pop
13 that up for you and you can look at it right on the
14 screen.

15 MR. MATTHEWS: Kate, are you showing us
16 a live copy of the website or is this a -- if this
17 is a PDF, can you tell us when this was downloaded?

18 MS. JANSON: Just a second. I just did
19 something funny with my -- can you guys -- I'm
20 sorry. I've got multiple windows going. Yes. So
21 this is -- this is not a live copy of the website,
22 but it -- it was retrieved on -- at April 23rd of
23 this year. So it's -- it's very recent. Are you
24 all able to see what I have up there?

25 MR. MATTHEWS: Yes. We can see part of

1 it.

2 MS. JANSON: Let me scroll up. How's
3 that?

4 MR. MATTHEWS: It is with the line that
5 begins wrath, parenthesis, Genesis 1:26-27,
6 Psalms 1 something. I can't read it. But
7 that's -- that's the bottom line that we can see
8 while we're seeing the top of the page.

9 BY MS. JANSON:

10 Q. I'll -- I'll scroll down slowly just
11 for the record. So this is -- this is going to be
12 Exhibit 18 and this is a page from Miracle Hill
13 Ministries' website.

14 (EXHIBIT 18, Miracle Hill Ministries
15 Agreement with Doctrinal Statement, was marked for
16 identification.)

17 BY MS. JANSON:

18 Q. And it's titled foster care inquiry
19 form. And I'll represent that it was accessed on
20 April 23rd of 2021. And I'll scroll down slowly so
21 you can -- so you can see, but this is just the
22 inquiry page that you -- that you get when you go
23 to Miracle Hill's website and you're looking to
24 inquire about being a foster parent.

25 So it starts with the agreement with

1 doctrinal statement and then it has the whole page
2 down below. I'm just going to ask you about what's
3 at the very top. So earlier I think you testified
4 that you were not aware of Miracle Hill encouraging
5 foster parents to provide religious instruction to
6 the foster children in their care. Do you remember
7 that?

8 A. Yes.

9 Q. And if you look at this foster care
10 inquiry form that's Exhibit 18, the first sentence
11 there under agreement with doctrinal statement
12 says: As an Evangelical Christian foster care
13 agency, we believe foster parents are in a position
14 of spiritual influence over the children in their
15 homes.

16 Can you explain to me what you
17 understand that to mean?

18 A. I'm not the author of that document and
19 I don't know what Miracle Hill intended when they
20 wrote that document.

21 Q. So you don't -- you don't have any
22 understanding from your role as the vice president
23 for children's ministries at Miracle Hill as to
24 what it means that Miracle Hill believes foster
25 parents are in a position of spiritual influence

1 over children in their homes?

2 A. I've heard that term used. It was --
3 that was never defined to me.

4 Q. And you don't have any -- any
5 independent understanding or view on what that
6 might mean?

7 A. Other than exactly what it says, that
8 they would be in a position of spiritual influence
9 in their home with children.

10 Q. So doesn't that suggest that foster
11 parents who work with Miracle Hill are encouraged
12 to -- to teach children Miracle Hill's religious
13 beliefs?

14 MR. COLEMAN: This is Miles. Object to
15 the form of the question.

16 THE WITNESS: It doesn't say that they
17 encourage it. It says that they are in a position
18 of.

19 BY MS. JANSON:

20 Q. Why -- why then would it be important
21 for foster parents to be in a position of spiritual
22 influence over the children in their homes if
23 the -- if the goal was not for them to expose the
24 children to Evangelical Christian religious
25 beliefs?

1 A. I can't speak on behalf of the ministry
2 and their purpose in that.

3 Q. Do you know whether -- whether families
4 of origin are -- are advised when their children
5 are going to be placed in a home with foster
6 parents that work with Miracle Hill, that Miracle
7 Hill believes foster parents are in a position of
8 spiritual influence over the children in their
9 homes?

10 A. I do not know.

11 Q. You don't know if the family's origin
12 are informed of that?

13 A. Yes, I do not know.

14 Q. Okay. Do you know whether any of
15 Miracle Hill's group homes have had children in
16 their care who identify as LGBTQ?

17 A. Yes.

18 Q. And have they, in fact, had children in
19 their care who identified as LGBTQ?

20 A. In the group homes?

21 Q. Yes.

22 A. Yes. Yes, we have had children.

23 Q. Do you know whether any children who
24 identify as LGBTQ have been placed with foster
25 families that work with Miracle Hill?

1 A. I believe so, but I am not certain.

2 Q. With respect to the -- to the children
3 who identify as LGBTQ who have been in Miracle
4 Hill's group homes, were you ever informed of any
5 problems or issues or anything with respect to
6 those kids in Miracle Hill's group homes?

7 A. I can't recall a specific incident.

8 Q. Do you ever -- do you recall any -- any
9 general issues or general concerns being brought to
10 you with regard to LGBTQ children in Miracle Hill's
11 group homes?

12 A. I remember discussions in staff
13 meetings about making sure that children were well
14 cared for, but I don't recall any specific
15 incidents.

16 Q. Would those discussions that you recall
17 in the staff meetings, were they -- I'm going to
18 put this away there. There we go. Now we're back
19 to normal.

20 Were they specific to LGBTQ children or
21 just more generally about caring for children?

22 A. Probably both. But again, I don't -- I
23 can't recall anything specific.

24 Q. Okay. Does Miracle Hill have -- have a
25 foster parent handbook?

1 A. They did.

2 Q. They did. And did Miracle Hill revise
3 its foster care parent handbook in 2020?

4 A. They did.

5 Q. Were you -- were you involved in that
6 process?

7 A. I was.

8 Q. All right. Let's look at -- let's look
9 at Tab 46. This is -- this is a document Bates --
10 it's going to be I guess Exhibit 19, I think.

11 Okay. And this is a document with Bates Number
12 Miracle Hill Subpoena 6020. And it's an e-mail
13 from Miss Busha to Brenda Parks and Sharon Betts
14 and others dated December 3rd of 2020.

15 (EXHIBIT 19, E-mail dated 12/3/20 to
16 Brenda Parks, Sharon Betts, Jacqueline Rector and
17 Jane Pulido from Karen Busha,
18 MIRACLE_HILL_SUBP_006020 to 006022, was marked for
19 identification.)

20 BY MS. JANSON:

21 Q. Just let me know if you recognize this
22 e-mail.

23 A. Yes.

24 Q. And it looks like from the attachments
25 listed that one of them was the foster family

1 handbook revised 2020 as a PDF.

2 MS. JANSON: And, you know, Steve, I
3 would just note that -- that in our production that
4 that attachment was a -- was indicated there was a
5 processing error, so it was just -- it was just a
6 single sheet saying that there was a processing
7 error.

8 MR. MATTHEWS: Okay.

9 MS. JANSON: So to the extent you can
10 find us a copy of that --

11 MR. MATTHEWS: Okay.

12 MS. JANSON: -- and send that over,
13 that would be great.

14 MR. MATTHEWS: So this was the
15 attachment to this e-mail?

16 MS. JANSON: Yeah. It's the one that's
17 saved as foster family handbook revised 2020.
18 Yeah.

19 BY MS. JANSON:

20 Q. Okay. So this e-mail then, Miss Busha,
21 you write: Good morning. A big thanks to Beth for
22 completing the revisions in the foster family
23 handbook and designing the foster parent and foster
24 child orientation checklist/signature page.

25 Is that -- Beth, is that Beth Sevilla?

1 A. Yes.

2 Q. And what was her role at Miracle Hill?

3 A. She was -- I don't recall her exact
4 title, but she provided administrative support to
5 the COO, to the HRVP and to myself. She was also
6 responsible for mentors, and I -- I believe she did
7 that under the developmental department.

8 Q. I think you said HRVP. Oh. Oh, you
9 mean human resources vice president?

10 A. Yes. I'm sorry, yes.

11 Q. Got it. And was she -- was she in
12 charge of revising the foster family handbook?

13 A. She did the -- she did the computer
14 work to revise it and assisted with the edits, but
15 she was not solely responsible.

16 Q. Who else was involved in the -- in the
17 process of revising the foster family handbook?

18 A. Well, the foster care leadership team,
19 Brenda Parks, Sharon Betts, Jacqueline Rector and
20 Jane Pulido.

21 Q. And what was your -- what was your
22 involvement in the process?

23 A. Review and to ensure that the foster
24 parent handbook covered all of the accreditation
25 requirements.

1 Q. Now, I don't -- I don't have the -- I
2 don't have the document itself to show you. But to
3 the extent you can recall, can you just describe
4 for me sort of generally what -- what the revisions
5 were that were made to the foster family handbook
6 in 2020?

7 A. I remember that we reorganized it so
8 the flow was better. Other than that, I can't
9 remember specific revisions without comparing the
10 documents.

11 Q. Do you remember if any of the revisions
12 involved any changes to the application process for
13 potential foster parents?

14 A. I don't recall.

15 Q. Okay. Do you remember whether any of
16 the revisions had to do with Miracle Hill's
17 relatively new policy of recruiting and working
18 with -- with Catholic families as foster parents?

19 A. I don't recall if that issue was in the
20 hand -- in the handbook.

21 Q. Do you recall whether there were any
22 revisions related to Miracle Hill's policies
23 regarding working with same sex couples or LGBTQ
24 individuals?

25 A. I don't remember that being part of the

1 handbook or revisions of the handbook.

2 Q. Okay. And how long was the revision --
3 how long did the revision process for the handbook
4 take, approximately?

5 A. I would say we worked on it several
6 months. The foster care staff did revisions
7 initially and it sat dormant for awhile and then we
8 began to work on it extensively right before
9 accreditation. I would say it probably took three
10 months to -- to finish the revisions, but I
11 wouldn't know without actually looking back at my
12 calendar.

13 Q. Okay. And when you say accreditation,
14 what is the -- what's the organization that -- that
15 would accredit Miracle Hill?

16 A. It is the Commission on Accreditation
17 of Rehab Facilities. The acronym is CARF, C-A-R-F,
18 and it's located in Tucson, Arizona.

19 Q. So that is -- that's not a government
20 body, is it?

21 A. No, it's not. It's a -- I believe a
22 for-profit body.

23 Q. Okay. Have you -- have you been
24 involved in your role at Miracle Hill with -- with
25 an organization called PAFCAF?

1 A. Yes.

2 Q. And what is -- what does PAFCAF stand
3 for?

4 A. It's the Palmetto Association of
5 Children and Family Services.

6 Q. And what does that organization do?

7 A. It's a private nonprofit organization
8 that offers support to private CPAs and
9 residential -- private residential programs that
10 serve DSS. They provide resources, education, and
11 they -- they also work with a lobbying team.

12 Q. Okay. So are -- are CPAs -- can CPAs
13 join as members of PAFCAF?

14 A. Yes.

15 Q. Okay. And was Miracle Hill a member of
16 PAFCAF?

17 A. Yes, we were.

18 Q. Okay. And I think you said that --
19 well, does PAFCAF sort of work with or liaise
20 with -- with DSS?

21 A. Yes, they do.

22 Q. And what types of issues or things
23 would PAFCAF interact with DSS on?

24 A. The primary one while I was at Miracle
25 Hill were the solicitation that DSS was developing

1 for foster care and the solicitation that was
2 issued for group homes.

3 Q. Okay. All right. Let's look at Tab
4 49, Serena. This is -- this is an e-mail with the
5 Bates -- Bates stamp Miracle Hill Subpoena 2384.
6 It's going to be Exhibit 20, I believe. And it's
7 an e-mail thread between Dawn Barton of DSS and
8 Miss Busha dated October 11th of 2019.

9 (EXHIBIT 20, E-mail chain dated
10 10/11/19 to Karen Busha from Dawn Barton, 002384 to
11 002386, was marked for identification.)

12 BY MS. JANSON:

13 Q. Once you've had a chance to look at
14 that, just let me know if you recognize that
15 document.

16 A. Yes, I recognize this document.

17 Q. Who -- Dawn Barton works at DSS, right?

18 A. That's correct.

19 Q. And do you know what her -- what her
20 role there is?

21 A. Just from the e-mail, director of
22 permanency management.

23 Q. Okay.

24 A. At the time of this e-mail.

25 Q. If you flip to the second page of the

1 document, at the bottom there it's you are writing
2 to Miss Barton on October 1st of 2019 and you say:
3 Thank you for sending PAFCAF the proposed licensure
4 for foster care document.

5 Do you remember what the -- what the
6 proposed licensure for foster care document that
7 you're referring to there was?

8 A. I think I was actually referring to the
9 solicitation, but -- for foster care, but not sure.

10 Q. Okay. So then below you -- in the next
11 paragraph you write: We at Miracle Hill Ministries
12 would like clarification on F(3), Page 13, as soon
13 as possible. It states, furthermore, the agency
14 must not discriminate with regard to the
15 application or licensure of a foster family on the
16 basis of age, disability, gender, sexual
17 orientation, gender identity or marital -- marital
18 status. Per the document definition, the agency
19 means the SCDSS.

20 And then you go on to say: Since the
21 budget proviso passed by the legislature requires
22 SCDSS to protect the religious freedoms of
23 agencies, please send us written clarification that
24 this is a requirement that applies to SCDSS as an
25 agency, not a requirement on religious CPAs that

1 contract with DSS.

2 So from that it looks to me like
3 there's this -- there was a provision in the
4 licensure for foster care document that you're
5 referring to that required -- it was a -- it was a
6 nondiscrimination provision. Is that correct?

7 A. Yes.

8 Q. And -- and that provision required the
9 agency not to discriminate with regard to the
10 application or licensure of a foster family on the
11 basis of religion or sexual orientation, is that
12 right?

13 A. That's correct.

14 Q. And I think what you're -- what you're
15 indicating in your e-mail there is that based on
16 your -- your reading of that provision in the
17 document, it only applied to DSS and not to private
18 CPAs, is that right?

19 A. The document defined the agency as the
20 South Carolina Department of Social Services.

21 Q. Okay. And why was it then that you
22 were seeking this clarification from DSS that the
23 nondiscrimination provision was, quote, not a
24 requirement on religious CPAs that contract with
25 DSS?

1 A. We were wanting written clarification
2 that they were respecting the budget proviso.

3 Q. And what -- what is the -- what is the
4 budget proviso that you're -- that you're referring
5 to there?

6 A. That protects the religious freedom of
7 agencies.

8 Q. And in your view did that budget
9 proviso respect -- I mean protect Miracle Hill's
10 ability to work only with prospective foster
11 parents who are Christian and agree with Miracle
12 Hill's doctrinal statement?

13 A. That was my understanding, yes.

14 Q. Do you know whether that budget proviso
15 ever actually became law?

16 A. No, I don't know.

17 Q. Then in the next e-mail in the chain,
18 Miss Barton replies to you and she says that she
19 would, quote, need to run this question through our
20 office of general counsel and will let you know the
21 response. Do you see that there?

22 A. Yes.

23 Q. And then from the -- from the rest of
24 the e-mail chain, it looks like you -- you followed
25 up with Miss Barton about ten days later and then

1 she responded in the top e-mail that she was still
2 awaiting a response. I'm assuming from legal.

3 Did you ever get a substantive response
4 from Miss Barton on the question that you had posed
5 in your e-mail?

6 A. I did not get anything in writing from
7 Miss Barton.

8 Q. Did you -- did you speak to her about
9 it orally?

10 A. I don't recall speaking to her orally
11 about this.

12 Q. Do you know -- do you remember if you
13 got any response on this question from anyone else
14 at DSS?

15 A. No. Not that I recall.

16 Q. Okay. So let's look at Tab 33. This
17 is going to be Exhibit 21 and it's marked Miracle
18 Hill Subpoena 3515 and it's an e-mail from Tony
19 Catone to Reid Lehman dated October 15th of 2019.

20 (EXHIBIT 21, E-mail chain dated
21 10/15/19 to Reid Lehman from Tony Catone,
22 MIRACLE_HILL_SUBP_003515 to 003518, was marked for
23 identification.)

24 BY MS. JANSON:

25 Q. Do you recognize this e-mail chain?

1 A. I'm sorry, I couldn't hear you.

2 Q. Sorry. Do you recognize this e-mail?

3 A. I recognize the part of the e-mail that
4 includes me.

5 Q. Okay. If you go to the second page of
6 the document, you can see about halfway there --
7 halfway down there is Dawn Barton's response to you
8 that we just looked at in the prior exhibit where
9 she says I'm still awaiting a response.

10 A. Yes.

11 Q. And then it looks like you forwarded
12 that exchange to Mr. Lehman and Mr. Kruithof on
13 October 11th and you wrote follow-up with Dawn
14 Barton, see below. Is that right?

15 A. Yes, that's correct.

16 Q. Okay. And then it looks like -- it
17 looks like Mr. Lehman forwarded the chain on to
18 Mr. Catone. And Attorney Catone is the general
19 counsel at DSS, is that right?

20 A. He was during my tenure at Miracle --
21 at Miracle Hill.

22 Q. Okay. And it looks from here like
23 Mr. Lehman and Mr. Catone made a plan to set up a
24 meeting to discuss what was in this -- the e-mail
25 chain, is that right?

1 A. That's what the e-mail says, yes.

2 Q. Do you know whether Mr. Catone and
3 Mr. Lehman ever actually had that meeting?

4 A. No, I do not know.

5 Q. Okay. Do you know whether Mr. Catone
6 ever provided clarification with respect to the
7 question that you had raised in your initial e-mail
8 to Dawn Barton?

9 A. I do not know.

10 Q. In your experience, does Miracle Hill
11 have sort of regular -- regular access to
12 high-level folks at DSS like Mr. Catone?

13 MR. COLEMAN: This is Miles. Object to
14 the form of the question.

15 THE WITNESS: I don't know what type of
16 access they have.

17 BY MS. JANSON:

18 Q. Okay. So -- so let's look at Tab --
19 this is 40.1, Serena, and it will be Exhibit 22.
20 This is a -- this is marked Miracle Hill Subpoena
21 2462 and it's an e-mail from Paula Fendley to
22 Miss Busha from November 20th of 2019.

23 I'm just interested in, you know, the
24 first page of this. You can obviously flip through
25 the rest of the document if you'd like, but I'm

1 just going to ask you about the second e-mail down
2 on the first page. And just let me know when
3 you're done looking at it if you recognize this
4 e-mail thread.

5 A. Yes.

6 MR. COLEMAN: Can I -- I'm sorry, this
7 is Miles. I just want to make sure that I'm
8 looking at the right document. We're on Exhibit
9 22?

10 MS. JANSON: Yep.

11 MR. COLEMAN: What I'm looking at does
12 not appear to be an e-mail thread.

13 MR. MATTHEWS: Not Tab 22. She just
14 numbered this as Exhibit 22.

15 MR. COLEMAN: Yeah, Exhibit 22, Tab
16 40.1?

17 MS. JANSON: Um-hum. I have not -- let
18 me -- let me see if we've got the right thing there
19 or not. Hold on. I'm just getting into the right
20 folder here on my Exhibit Share.

21 MR. COLEMAN: Sure.

22 MS. JANSON: Oh. Well, that's going to
23 be the next thing we look at, so it's fine that we
24 have that one up there.

25 Serena, do we have the -- do we have

1 the e-mail that I think comes before?

2 MS. CANDELARIA: This is 40.1 and we
3 also have the e-mail as just 40. I can put them as
4 the same exhibit if that would be helpful.

5 MS. JANSON: It's okay to make them
6 separate. Why don't we just make Tab 40 Exhibit 23
7 and I'll talk about that one, and then we'll go
8 back to this one.

9 MS. CANDELARIA: Okay. Perfect.

10 (EXHIBIT 22, Document entitled PAFCAF
11 Member Comments - October 2019, Section-by-Section
12 Discussion, MIRACLE_HILL_SUBP_002470 to 002487, was
13 marked for identification.)

14 (EXHIBIT 23, E-mail chain dated
15 11/20/19 to Karen Busha from Paula M. Fendley,
16 MIRACLE_HILL_SUBP_002462 to 002469, was marked for
17 identification.)

18 BY MS. JANSON:

19 Q. Okay. So Exhibit 23 is going to be up
20 in just a second and that will be the e-mail -- the
21 e-mail thread that I described before, Miracle Hill
22 Subpoena 2462 as the beginning Bates.

23 And, Miss Busha, did you say you
24 recognized this e-mail thread?

25 A. Yes.

1 Q. Okay. And so who is -- who is Paula
2 Fendley?

3 A. Oh, she was the interim CEO at
4 PAFCAF -- of PAFCAF at that time.

5 Q. Okay. And she writes at the bottom of
6 that first page on October 21st of 2019: Here is
7 the revised table of comments to the SCDSS FP
8 Licensing Regulation proposal based upon comments
9 at our meeting today. I added Karen's comment and
10 added language at the end of the document
11 summarizing concerns and observations.

12 Do you see that there?

13 A. Yes.

14 Q. Is she -- when she says I added Karen's
15 comments, is she referring to you?

16 A. Yes.

17 Q. And then in the top e-mail there, which
18 is from about a month later on November 20 of 2019,
19 she writes in her second sentence: Again, DSS and
20 the ALJ did not consider or incorporate any of the
21 providers' suggestions.

22 Do you see that there?

23 A. Yes.

24 Q. Okay. And then the document that had
25 popped up on Exhibit Share first that we marked as

1 Exhibit 22, that is a chart and it has Miracle Hill
2 Subpoena 2470 as the beginning Bates number and
3 it's titled PAFCAF Member Comments, October 2019.

4 MR. MATTHEWS: I'm sorry, what was the
5 Bates Number on that one?

6 MS. JANSON: Sure. It's 2470.

7 BY MS. JANSON:

8 Q. Do you recognize this document?

9 A. Yes.

10 Q. Does this appear to be the version of
11 the table of comments that Miss Fendley was
12 referring to in her e-mail?

13 A. Yes.

14 Q. And it looks to me that the left-hand
15 column of this chart is the language of -- it looks
16 like a proposed regulation by DSS. And then the
17 right-hand column contain various comments on
18 certain provisions of the regulation from PAFCAF
19 members. Is that -- is that your understanding of
20 what this chart depicts?

21 A. Yes.

22 Q. And then if we flip ahead to the page
23 that's marked 2474 and -- and continues on into
24 2475, there is a paragraph, if you look, it says F,
25 eligibility standards and then Paragraph 3. And it

1 says: The agency must not deny to any individual
2 the opportunity to become a foster parent on the
3 basis of race, color or national origin of the
4 individual or of the child. And it goes on.

5 And then later at the -- sorry, I
6 should have -- I started reading too early. My
7 apologies. At the very bottom of that section on
8 2474, Paragraph 3 on the left-hand column, it says:
9 Furthermore, the agency must not discriminate with
10 regard to the application or licensure of a foster
11 family on the basis of age, disability, gender,
12 religion, sexual orientation, gender identity or
13 marital status.

14 And then in the right-hand column there
15 at the top of Page 2475, it says, Number 3: How
16 does this impact faith-based CPAs' right to
17 religious freedom, question mark. Per the
18 document, agency refers to SCDSS.

19 Do you see that there?

20 A. Yes.

21 Q. And does that -- this -- this seems to
22 me to be the same -- the same language and the same
23 question that you had raised in the e-mail that we
24 marked as Exhibit 20, which ends with 2384. That
25 was your conversation -- that was your e-mail

1 conversation with Dawn Barton?

2 A. Yes.

3 Q. And it had been regarding a proposed
4 licensure for foster care document?

5 A. Yes.

6 Q. Does this -- does this look like it's
7 the -- that this regulation that's being discussed
8 here in Exhibits -- Exhibit 22, is that, in fact,
9 the same document that you were writing to
10 Miss Barton about in Exhibit 20?

11 A. I just wanted to check the number on my
12 e-mail. Yes. This is the document I was referring
13 to.

14 Q. Okay. And so this is -- these are our
15 proposed revisions to DSS's regulation related to
16 foster parent -- or foster care licensing, right?

17 A. Yes.

18 Q. And the section that I read on the top
19 of 2475, the right-hand column where it says how
20 does this impact faith-based CPAs' right to
21 religious freedom, per the document agency refers
22 to SCDSS, did that reflect -- that was Miracle
23 Hill's comment that you had raised to Miss Barton,
24 right?

25 A. Yes.

1 Q. Do you recall whether any other PAFCAF
2 members also shared -- shared Miracle Hill's
3 concern that the nondiscrimination requirement
4 would affect a CPA's right to religious freedom?

5 A. I do not recall.

6 Q. Do you know whether -- whether anyone
7 at PAFCAF raised that specific concern to DSS on
8 Miracle Hill's behalf?

9 A. I do not know.

10 Q. And in Miss Fendley's e-mail that we
11 marked as Exhibit 23 which ends with 2462, again
12 she wrote: DSS and the ALJ did not consider or
13 incorporate any of the providers' suggestions.

14 What does ALJ refer to, if you know?

15 A. Yeah, I don't know.

16 Q. Okay. And do you have any -- any
17 understanding as to why DSS did not consider or
18 incorporate any of the PAFCAF providers'
19 suggestions?

20 A. No, I don't -- I do not.

21 Q. Okay. All right. We can put those
22 aside. I understand from our discussion before
23 that Miracle Hill is licensed by DSS as a CPA to
24 provide foster care services, is that right?

25 A. That's correct.

1 Q. Does Miracle Hill also have a contract
2 or -- while you were -- while you were there as VP
3 of children's ministries, did Miracle Hill also
4 have a contract to provide foster care services
5 with DSS?

6 A. We only had an emergency contract.

7 Q. Okay. And what did it mean that it was
8 an emergency contract?

9 A. DSS was not ready to issue the full
10 solicitation and they issued an emergency contract.
11 I'm not sure of the reason that they issued the
12 emergency contract.

13 Q. Okay. When you said they weren't ready
14 to issue a full solicitation, what is a -- what
15 does a solicitation mean in that context?

16 A. It would be the full licensing contract
17 that -- the documents that we just looked at, those
18 are things from the full solicitation.

19 Q. And so the solicitation is something
20 that DSS would put out essentially asking for --
21 for CPAs that wanted to contract with DSS to
22 provide foster care services, is that generally
23 right?

24 A. That's correct. That's correct.

25 Q. And when DSS does put out a

1 solicitation just generally and it gets -- it gets
2 CPAs that are -- that are interested in contracting
3 with DSS, do you know what those -- what those
4 contracts typically provide for?

5 A. There had not been a solicitation for
6 contract for foster care. This would have been the
7 first solicitation that DSS had issued for foster
8 care.

9 Q. Okay. And this was in the 2018 period,
10 is that -- is that right?

11 A. I don't recall when they started
12 working on the -- I think it was 2019 they were
13 still working on the solicitation for foster care.
14 Our comments were October of 2019, so I'm not sure
15 exactly when DSS started their work on the
16 solicitation.

17 Q. Okay. So prior to -- prior to this,
18 that solicitation, CPAs that worked with DSS to
19 provide foster care services did not have a
20 contract with DSS, is that right?

21 A. That's correct.

22 Q. Okay. They were licensed by DSS, but
23 they didn't have a specific contractual
24 relationship, right?

25 A. Yes, we did not have a contract.

1 Q. Okay.

2 MR. COLEMAN: This is Miles. Object to
3 the form of the question.

4 BY MS. JANSON:

5 Q. Okay. So I want to -- I want to look
6 at a couple -- a couple documents on this. If we
7 can look at Tab 11. Serena, this is going to be
8 Exhibit 24.

9 COURT REPORTER: I'm sorry, what tab
10 did you say, Kate?

11 MS. JANSON: I said 11.

12 COURT REPORTER: Thank you.

13 MS. JANSON: It's going to be Exhibit
14 24 and it's Bates numbered Miracle Hill Subpoena
15 8240. It's a document titled Protest Decision
16 dated November 20th of 2018.

17 (EXHIBIT 24, Document entitled Protest
18 Decision, MIRACLE_HILL_SUBP_008240 to 008249, was
19 marked for identification.)

20 BY MS. JANSON:

21 Q. Do you -- do you recognize this
22 document?

23 A. Yes.

24 Q. Okay. So if you look at the second --
25 if you look at the second page of the document

1 under analysis, it says: MHM, I assume that's
2 Miracle Hill Ministries, raises three issues of
3 protest.

4 And then in the paragraph numbered 3,
5 it says -- it's summarizing Miracle Hill's issue of
6 protest and it says: We protest the requirement
7 initially found as the third of the child placing
8 agencies' responsibilities. This requirement
9 purports to require bidders to adhere to the
10 requirements provided in the licensing regulations
11 without adding to or taking away from said
12 requirements and purports to require the bidder to
13 suspend any such practice after being notified by
14 SCDS that said practice allegedly violates this
15 requirement.

16 Do you see that there?

17 A. Yes.

18 Q. Do you have an understanding as to what
19 the requirements provided in the licensing
20 regulations that's referred to in that -- in that
21 language I just read, what that refers to?

22 A. So what is your question again?

23 Q. I'm just trying to understand what --
24 where it says there in the language I just read, it
25 refers to requirements provided in the licensing

1 regulations. And I'm wondering if you know what
2 requirements in the licensing regulation are being
3 referred to there.

4 A. Yeah, I don't recall. This was
5 prepared by our attorney.

6 Q. Okay. Do you know whether -- whether
7 the requirements referred to there included the
8 nondiscrimination provision that -- that we were
9 talking about just before this?

10 A. I don't recall.

11 Q. Okay. If you look at the last -- at
12 the last page of this document with the Number
13 8242, the chief -- the DSS chief procurement --
14 well, I guess it's the chief -- chief procurement
15 officer. He writes that after receipt of Miracle
16 Hill's protest, DSS requested cancellation of the
17 solicitation so that -- so that it may revise and
18 reissue the solicitation at a later date. As a
19 result, the protest of Miracle Hill Ministries is
20 moot.

21 Do you know whether, in fact, DSS
22 reissued a new solicitation later as that language
23 indicates that it would?

24 A. The foster care solicitation had not
25 been issued prior to my leaving Miracle Hill. The

1 final version of the solicitation had not been
2 issued before I left.

3 Q. Okay. So as of January 2021, the final
4 foster care solicitation still has not -- had not
5 been issued?

6 A. That's correct.

7 Q. Okay. And earlier you mentioned that
8 DSS -- excuse me, that Miracle Hill had an
9 emergency contract with DSS, right?

10 A. Yes.

11 Q. I just want to take a look at that and
12 ask you a couple quick things about that if we can.

13 So, Serena, this is -- this is Tab
14 19.1. It's going to be Exhibit 25 and it's Miracle
15 Hill Subpoena 5953 and it's titled Emergency
16 Contract Between the South Carolina Department of
17 Social Services and Miracle Hill Ministries, Inc.

18 (EXHIBIT 25, Emergency Contract Between
19 The South Carolina Department of Social Services
20 and Miracle Hill Ministries, Inc.,
21 MIRACLE_HILL_SUBP_005953 to 005972, was marked for
22 identification.)

23 BY MS. JANSON:

24 Q. And is this -- is this, in fact, the
25 emergency contract that you referenced earlier in

1 your testimony?

2 A. Yes.

3 Q. And I think you explained that it's
4 called an emergency contract because the official
5 solicitation had not yet gone out at the time that
6 this document was -- was entered into, is that
7 right?

8 A. That -- that is my understanding.

9 Q. And just so we're -- we're clear on the
10 time period here, if you look at the -- towards the
11 back of the document, the pages labeled 5968 and
12 5969. You'll see the signatures there. And this
13 looks like it was signed by Barbara Derrick from
14 DSS on March 29th of 2019 and signed by you on
15 March 28th of 2019, is that right?

16 A. That's -- that's correct.

17 Q. Okay. And on the first page -- first
18 page of the document, it says: This contract --
19 the second line. It says: This contract is
20 entered into as of January 1st, 2019.

21 Do you know why it was that it was
22 entered -- the contract was entered into as of
23 January 1st of 2019 when it was -- wasn't signed
24 until the end of March of 2019?

25 A. I don't know why DSS issued it late.

1 Q. Okay. Do you know if there was --
2 whether this was -- was the first contract that
3 Miracle Hill had with DSS to provide foster care
4 services?

5 A. To my knowledge, this was the first
6 contract.

7 Q. Okay. Do you know whether at the
8 time -- as of January 1st, 2019 whether Miracle
9 Hill had a permanent or a standard CPA license from
10 DSS?

11 A. I -- I don't remember the date that the
12 permanent license was reissued to Miracle Hill.

13 Q. Okay. And just generally, we won't go
14 through the full document, but what -- what type of
15 services was Miracle Hill contracting to provide to
16 DSS under the terms of -- of this emergency
17 contract?

18 A. This emergency contract was to -- was
19 with the current licensed group homes who were also
20 CPAs to get children out of group homes and into
21 foster care homes.

22 Q. Okay. So this was -- this was intended
23 specifically to cover moving -- or an effort, I
24 should say, to try to transition children who were
25 in residential care facilities into foster family

1 placements?

2 A. That was my understanding.

3 Q. Okay. So it wasn't -- it wasn't a more
4 generally applicable contract that governs all of
5 Miracle Hill's foster care services, it was -- it
6 was more -- more focused in that way, is that
7 right?

8 A. That's what I read in the document.

9 Q. Okay. Do you have any -- any
10 independent recollection of this emergency contract
11 apart from looking at the document now?

12 A. No. DSS just sent the document.

13 Q. Okay. Do you know what the -- what the
14 end date for this contract with them would have
15 been?

16 A. The front page says through June 30th,
17 2019.

18 Q. Okay. Great. I see that there, yes.
19 Okay. Let's look at Tab -- this is going to be
20 28.1. It will be Exhibit 26. And it's labeled
21 Miracle Hill Subpoena 5857 (sic) and it's a
22 document titled Change Order Number 1.

23 (EXHIBIT 26, State of South Carolina
24 Change Order #1, MIRACLE_HILL_SUBP_005882 to
25 005883, was marked for identification.)

1 BY MS. JANSON:

2 Q. And it's -- do you recognize -- do you
3 recognize this document?

4 A. Yes.

5 Q. If you look down in the portion of the
6 document, it has sort of the box around it. It
7 says: Description of change/modification. And it
8 says: To amend the emergency contract to extend
9 the end date. This change order extends the end
10 date to June 30th, 2020. This is an emergency
11 contract intended to enable South Carolina DSS to
12 immediately utilize CPAs to facilitate the
13 placement of children in foster care and is offered
14 for the limited purpose of enabling SCDSS to fill
15 this need in the interim until the full
16 solicitation is available.

17 So that description there of the
18 purpose of the emergency contract is consistent
19 with what we've been discussing, right?

20 A. Yes.

21 Q. Do you know whether the emergency
22 contract, the end date of this emergency contract,
23 was ever extended again beyond June 30th, 2020?

24 A. I don't recall.

25 Q. Okay. Let's just look back real

1 quickly at the emergency contract that was Exhibit
2 25. And if we look at -- here we go. The page
3 that's marked 5957, halfway through that page is
4 Section B. It says limit on total reimbursement.

5 A. 857?

6 MR. MATTHEWS: 57. It's the emergency
7 contract.

8 THE WITNESS: Oh. I see. Yeah.

9 BY MS. JANSON:

10 Q. Do you see where that is where it says
11 limit on total reimbursement?

12 A. Yes.

13 Q. And it says -- it says total funds
14 239,075 dollars, correct?

15 A. Yes, I see that.

16 Q. Okay. And then when we go -- if we go
17 back to the change order, Exhibit 26, under
18 description of change or modification, it looks
19 like that -- that total limit on total
20 reimbursement is also a provision that was modified
21 by the change order, right?

22 A. It was included in the change order,
23 yes.

24 Q. Um-hum. And then the change order, it
25 says total funds, 956,300 dollars, right?

1 A. Yes.

2 Q. Do you know why -- why it was that the
3 reimbursement limit provided for in Miracle Hill's
4 emergency contract with DSS was increased by more
5 than 700,000 dollars in the -- in the change order?

6 A. So the change order is covering one
7 year of reimbursement and I don't believe that the
8 initial emergency solicitation was covering that
9 much time.

10 Q. It looks to me from the emergency
11 contract like it was initially -- it was initially
12 enforced for six months, January 1st, 2019 through
13 June 30th of 2019. Do you see that on the first
14 page under Article 1 of the emergency contract?

15 A. Yes. I don't know why there would be
16 an increase.

17 Q. Okay.

18 A. In the total funds.

19 Q. Do you have any understanding of how
20 the reimbursement limits reflected either in the
21 emergency contract or the change order were
22 calculated?

23 A. No.

24 Q. Do you know whether those reimbursement
25 limits are -- are based on the number of children

1 placed with foster families that are supported by
2 the CPA?

3 A. No.

4 Q. Do you have any understanding of
5 where -- where the reimbursement funds that -- that
6 are referred to in the emergency contract in the
7 change order come from?

8 A. DSS is all I know.

9 Q. Okay. Do you know whether -- whether
10 those funds from DSS originate from the federal
11 government?

12 A. No, I don't know.

13 Q. Do you know whether the terms of the
14 emergency contract -- and again, that's Exhibit
15 25 -- required compliance with federal
16 nondiscrimination statutes, regulations and
17 policies?

18 A. Can you repeat the question?

19 Q. Sure. Do you know whether the terms of
20 the emergency contract required compliance with
21 federal nondiscrimination statutes, regulations and
22 policies?

23 A. Yes.

24 Q. Yes, they did require compliance?

25 A. With the Civil Rights Act, yes.

1 Q. And if you look at -- if you look on
2 the page marked 563 of the emergency contract, I
3 think this is the language that you're referring
4 to. It says the contractor -- Article 9, covenants
5 and conditions.

6 Section A: The contractor agrees to
7 comply with all applicable federal and state laws
8 and regulations, including -- I'm summarizing
9 here -- but not limited to, jumping down to Number
10 2, Title 6 of the Civil Rights Act of 1964, and
11 regulations issued pursuant thereto, 45 CFR Part
12 80.

13 Do you see that there?

14 A. Yes.

15 Q. And then a little farther below under
16 Paragraph 6, it says: The Omnibus Budget
17 Reconciliation Act of 1981, which prohibits
18 discrimination on the basis of sex and religion in
19 programs and activities receiving or benefitting
20 from federal financial assistance.

21 Do you see that?

22 A. Yes.

23 Q. So when we looked at the -- when we
24 looked at the change order that was -- that's
25 Exhibit 26, were -- were either of the provisions

1 that I just read, were those amended by the change
2 order at all?

3 A. No.

4 Q. Do you know whether Miracle Hill
5 negotiated the terms of its emergency contract with
6 DSS?

7 A. No.

8 Q. No, you don't know or no, Miracle Hill
9 didn't negotiate?

10 A. No, I don't know. I don't -- I don't
11 know what anyone did other than myself.

12 Q. Okay. Did -- and you didn't negotiate
13 the terms of the emergency contract with DSS?

14 A. No.

15 Q. Okay. All right. So just one last
16 document I want to take a peek at on this topic.
17 If we can look at Tab 19. This will be Exhibit 27.
18 It's Miracle Hill Subpoena 5948 and it's an e-mail
19 from Stephen Taylor to Miss Busha dated March 29th
20 of 2019.

21 (EXHIBIT 27, E-mail chain dated 3/29/19
22 to Karen Busha from Stephen Taylor,
23 MIRACLE_HILL_SUBP_005948 to 005952, was marked for
24 identification.)

25 BY MS. JANSON:

1 Q. Do you recognize this e-mail chain?

2 A. Yes.

3 Q. If you look at -- it's the page labeled
4 5950. It looks like it's an e-mail that you're
5 sending to Mr. Taylor at DSS. And you say:
6 Attached is the signed CPA emergency contract for
7 Miracle Hill Ministries as requested.

8 And then you write: Please note, our
9 understanding of Article 9, covenants and
10 conditions, Number 6, Page 11, as it pertains to
11 Miracle Hill Ministries is as follows: The Omnibus
12 Budget Reconciliation Act of 1981, which prohibits
13 employment, underlined, discrimination on the basis
14 of sex and religion in programs and activities
15 receiving or benefitting from federal financial
16 assistance, but which exempts religious providers
17 from this requirement, see Subchapter C, it lists
18 the specific section.

19 Is it right that the language there
20 that is underlined is -- is language that -- that
21 you added to the Paragraph Number 6 of Article 9 of
22 the emergency contract when you wrote this e-mail?

23 A. What's the question?

24 Q. The under -- the language that's
25 underlined in your e-mail where you're writing

1 about Paragraph 6 from Article 9 of the emergency
2 contract, is that underlined language language that
3 you added that does not exist in the emergency
4 contract as written? And we can go back and look
5 at the emergency contract if that would be helpful.

6 A. Yes, because I -- I don't remember.

7 Q. Sure. So if you look back at Exhibit
8 25, the emergency contract, and you go back to Page
9 5963. You'll see Article 9, covenants and
10 conditions.

11 A. Yes.

12 Q. And then under A, Paragraph 6 is the
13 language about the Omnibus Budget Reconciliation
14 Act of 1981 that I read earlier.

15 A. Yes.

16 Q. And then if you compare -- if you
17 compare that paragraph from the contract to what
18 you've written in your e-mail in Exhibit 27, it
19 looks to me like you've -- you've added some
20 language there and that's indicated by the
21 underlining. Is that your understanding?

22 A. It appears so.

23 Q. Okay. Why did you think it was
24 important to include that -- that note in your
25 e-mail to Mr. Taylor when you returned the signed

1 emergency contract?

2 MR. MATTHEWS: I'm going to object on
3 the basis of attorney/client privilege to the
4 extent that the addition reflects advice received
5 from a lawyer for Miracle Hill or for Miss Busha.
6 I'm going to instruct her not to answer that
7 question.

8 If she had independent reason outside
9 of communications with counsel why she added that,
10 she's free to answer. But to the extent it relates
11 to attorney/client communications, I'll object on
12 the basis of privilege and instruct the witness not
13 to answer.

14 THE WITNESS: I have no response.

15 BY MS. JANSON:

16 Q. Okay. So you don't have any
17 independent understanding of why you put that in
18 your e-mail aside from what you may have discussed
19 with -- with attorneys, is that right?

20 A. That's correct.

21 Q. Okay. Do you know whether -- whether
22 DSS ever either -- ever responded back to your note
23 here in Exhibit 27?

24 A. I don't recall.

25 Q. Okay. All right. We can put that

1 aside. All right. So we have -- we've been going
2 about another -- about an hour and 15. I'm -- I'm
3 definitely getting closer to -- closish to the end
4 of what I have. Do -- would you like to take a
5 break now or would you like to forge on a little
6 bit more?

7 A. We can forge on a little more.

8 Q. Okay. Great. All right. So if we
9 look at -- if we can look at Tab 31. This was
10 marked Miracle Hill Subpoena 7303 and it's going to
11 be Exhibit 28. And this is -- this is a document
12 that's titled DSS Timeline.

13 (EXHIBIT 28, E-mail chain entitled DSS
14 Timeline, MIRACLE_HILL_SUBPOENA_007303 to 007307,
15 was marked for identification.)

16 BY MS. JANSON:

17 Q. Do you have that in front of you?

18 A. Yes.

19 Q. Is this -- is this a document that you
20 recognize?

21 A. Yes.

22 Q. Had you -- had you seen this prior to
23 your preparation for this deposition?

24 A. It appears that some of this I was
25 copied on and some of it I was not.

1 Q. So this -- this looks to me like it's a
2 collection of communications and summaries of
3 events from September 27th to October 31st of 2019.
4 Does that sound right to you?

5 A. Yes.

6 Q. Do you know who -- and it's called --
7 it's titled DSS timeline. Do you know who compiled
8 this timeline?

9 A. It appears that Ken Kruithof. I don't
10 know.

11 Q. You don't know. But it wasn't you?

12 A. No.

13 Q. Okay. On the first page, the first
14 e-mail there that's copied in from September 27th,
15 is an e-mail from Ken Kruithof to Michael Leach
16 cc'g you and Emily Parks. And Mr. Leach, he is the
17 current director of South Carolina DSS, is that
18 right?

19 A. Yes.

20 Q. Do you know who Emily Parks is?

21 A. Yes.

22 Q. And who is that?

23 A. She was his chief of staff while I was
24 at Miracle Hill.

25 Q. Okay. And about -- the third paragraph

1 down, Mr. Kruithof writes: We at Miracle Hill
2 would like to invite you and Emily to visit our
3 staff and facilities at your earliest convenience.

4 Do you know why Mr. Kruithof invited
5 Mr. Leach and Miss Parks to visit Miracle Hill?

6 A. It was our understanding that Mr. Leach
7 wanted to see facilities throughout the state and
8 we wanted to invite him to Miracle Hill to welcome
9 him and to show him all of the services that
10 Miracle Hill provides.

11 Q. Do you know whether the visit that's
12 being contemplated in this e-mail actually took
13 place?

14 A. Yes, it took place.

15 Q. And approximately when was that?

16 A. I believe it was in November of 2019.

17 Q. Did you participate in the -- in the
18 visit?

19 A. I did.

20 Q. And who else -- who else from Miracle
21 Hill participated?

22 A. Reid -- Reid Lehman was there, Ken
23 Kruithof, Brenda Parks, myself, Emily Parks,
24 Mr. Leach. And I can't recall who else may have
25 been in the meeting. Sharon Betts may have been

1 there, but I can't recall.

2 Q. Okay. And do you recall generally what
3 was discussed during Mr. Leach and Miss Parks'
4 visit?

5 A. We shared with him information
6 regarding our statistics for foster care and toured
7 him through some of the adult facilities at Miracle
8 Hill to show him our efforts to keep children out
9 of the DSS system by helping their parents.

10 Q. Okay. All right. If you look down at
11 the next -- the next entry in the document, it's
12 dated October 28th of 2019. And then on the top of
13 the next page, there's a note there, Model Foster
14 Care Licensing hearing in Columbia with DSS. DSS
15 confirmed that agency means DSS, but objected to
16 PAFCAF question on how the additional
17 discrimination indicators would affect faith-based
18 CPAs.

19 Do you see that there?

20 A. I do.

21 Q. Do you know what -- what it means when
22 it says that there was a Model Foster Care
23 Licensing hearing?

24 A. I believe it refers to the licensing
25 document that we had been looking at that PAFCAF

1 was giving feedback on.

2 Q. Okay. So this is talking about that --
3 the same proposed licensing regulation we discussed
4 earlier and then the question -- where you had
5 raised the question regarding the nondiscrimination
6 requirement applied, is that right?

7 A. Yes.

8 MR. MATTHEWS: Object to the form of
9 the question. Mischaracterizes prior testimony.
10 And I don't think it suggests mischaracterization
11 was intentional.

12 And, Kate, if you'd like me to tell you
13 what it is outside the presence of the witness, I'm
14 happy to do that.

15 MS. JANSON: Okay. I'm just looking
16 back to see if I can rephrase.

17 MR. MATTHEWS: I think it was just a
18 phrasing issue.

19 BY MS. JANSON:

20 Q. Okay. I'm just trying to establish
21 whether what's being referenced -- to the issue
22 that's being referenced in -- in this document that
23 we marked as Exhibit 28 is generally the same --
24 the same issue that we were discussing before with
25 respect to DSS's revisions to its licensing

1 regulation. It's -- we're generally talking about
2 the same subject matter, right?

3 MR. MATTHEWS: Again I'm going to
4 object to the form. May I -- just so I don't --
5 may I ask the witness to step out in the hall for
6 just a second and let me talk to Kate for a second?
7 I just want to clear something up. If you could
8 step out.

9 THE WITNESS: Yes.

10 MR. MATTHEWS: Thanks.

11 (At which time, the witness exited the
12 proceedings.)

13 MR. MATTHEWS: I'm sorry, I don't mean
14 to intrude, but I -- you referred to it as proposed
15 modifications to the licensing regulation. I think
16 the term's modifications to the draft solicitation,
17 not to licensing regulation. I think that was the
18 proposed solicitation for the contract. Was that
19 correct or am I misremembering well?

20 MS. JANSON: Well, the -- you know,
21 honestly it's not entirely clear from -- from the
22 document, the chart that we had looked at.

23 MR. MATTHEWS: Yeah.

24 MS. JANSON: And I don't remember which
25 exhibit that was at this point.

1 MR. MATTHEWS: It was -- hold on.

2 MS. JANSON: Was it 30? 40 maybe?

3 Here, I'll find it. One second.

4 MR. COLEMAN: It's 22.

5 MS. JANSON: 22. Yeah. Thank you.

6 Thanks, Miles. Yeah, it -- it wasn't clear to me
7 from --

8 MR. MATTHEWS: And it was referred
9 to -- Miss Fendley at some point, I can't put my
10 hands on it, Miss Fendley at some point in an
11 e-mail referred to it as a licensing regulation,
12 but I thought it was that draft solicitation.
13 We're all talking about the same thing. I'm okay
14 with that. I just wanted to make sure that was --

15 MS. JANSON: Yeah, it just -- it looks
16 to me from the header on the -- on this chart that
17 was Exhibit 22, that those are -- those provisions
18 are provisions listed from the -- you know, the
19 regulations, right?

20 MR. MATTHEWS: I'm -- I'm good with
21 that. We're all talking about the same thing
22 anyway, but I just wanted to make sure we had
23 that -- there wasn't any confusion. The confusion
24 may have been entirely mine, so...

25 MS. JANSON: No problem.

1 MR. MATTHEWS: Thank you for your --
2 thank you for your time. Let me get the witness
3 back in the room.

4 MS. JANSON: Sure.

5 (At which time, the witness reentered
6 the proceedings.)

7 BY MS. JANSON:

8 Q. Okay. So we were just discussing the
9 language on the top of the second page of the DSS
10 timeline, Exhibit 28. And it says there: DSS
11 confirmed that agency means DSS, but objected to
12 PAFCAF question on how the additional
13 discrimination indicators would affect faith-based
14 CPAs.

15 Do you know what -- what it means there
16 that DSS objected to the question?

17 A. No.

18 Q. No. Okay. Did you attend this Model
19 Foster Care Licensing hearing with DSS?

20 A. I don't recall.

21 Q. Okay. And just below, the next
22 sentence there from October 28th of 2019, it's an
23 e-mail from Jacqueline Lowe to you and Mr. Lehman
24 and others and he's asking -- it looks like she's
25 asking whether Miracle Hill had available family to

1 foster two children from the upstate. Do you see
2 that there in that e-mail?

3 A. Yes.

4 Q. And Miss Lowe worked at DSS, right?

5 A. Yes.

6 Q. In your role as VP of children's
7 ministries at Miracle Hill, were you -- were you
8 personally involved in helping DSS find placements
9 for foster children with Miracle Hill's foster
10 families?

11 A. No.

12 Q. No. Do you have an understanding of
13 how that process typically worked?

14 A. Yes.

15 Q. And can you just summarize it briefly
16 for me?

17 A. DSS makes contact with the child
18 placing agency. I believe there's a screening form
19 that is completed and then our staff begin to look
20 for homes for the child.

21 Q. From the foster families that Miracle
22 Hill works with?

23 A. That is correct.

24 Q. Okay. And if Miracle Hill has a home
25 that it thinks would be a good fit, is that

1 conveyed -- is that then conveyed to DSS?

2 A. That's correct.

3 Q. Okay. And if it doesn't, the -- again,
4 that information is conveyed back to DSS, right?

5 A. Yes.

6 Q. And it looks like that was the response
7 that was -- that was provided in this instance, it
8 says notified DSS placement that we did not have a
9 home?

10 A. Yes.

11 Q. And then below that, the October 29th,
12 2019 entry is an e-mail from Mr. Kruithof to
13 Mr. Leach, Miss Parks and someone by the name of
14 Carol Smoak? Do you know who Carol Smoak is?

15 A. I believe she was Mr. Leach's
16 assistant.

17 Q. Okay.

18 A. Administrative assistant.

19 Q. Um-hum. And you're copied on this
20 e-mail along with Mr. Lehman and Miss Parks. And
21 Mr. Kruithof starts out by saying we are looking
22 forward to our meeting next week to take place at
23 our offices and he gives the Greenville address.

24 Is Mr. Kruithof there referring to the
25 same -- to the same visit that was being

1 contemplated in the first e-mail in this document?

2 A. Yes.

3 Q. And then in the next entry from October
4 30th, Mr. Leach -- it looks like Mr. Leach sends an
5 e-mail back to Mr. Kruithof in response to his
6 message. And he says -- he says thank you and then
7 he goes on to say that he is anxious about the
8 visit due to the lawsuit based on the decisions
9 Miracle Hill has made. This has put me in a
10 situation I do not like and I'm having difficulty
11 with it.

12 Did you ever speak with -- speak with
13 Mr. Leach during the course of your duties at
14 Miracle Hill?

15 A. I spoke with him during this meeting.

16 Q. Any other times?

17 A. And we went to greet him and welcome
18 him to South Carolina I believe it was in June of
19 2019.

20 Q. Okay. Do you have any understanding --
21 and I recognize that it doesn't look like you were
22 copied on this e-mail, but do you have any
23 understanding of what -- what lawsuit he's
24 referring to in this message?

25 A. No, I don't -- I don't know what he's

1 referring to in this message.

2 Q. Okay. Do you have any understanding as
3 to why Mr. Leach would have been anxious about the
4 meeting with Miracle Hill?

5 A. No, I -- I don't know. I can't speak
6 for Mr. Leach.

7 Q. Okay. And then, let's see, if we
8 jump -- if we jump down to the bottom of that -- of
9 that same page, 7305, there's an e-mail from
10 Jacqueline Lowe to you and Miss Parks cc'g Dawn
11 Barton.

12 And she says: Karen, I would like to
13 arrange a time for us to meet with you and Brenda
14 about placement of children in foster care with
15 families licensed through your agency. Would you
16 offer some available times in November that we can
17 meet.

18 And then below that, a couple of
19 entries down, it's, in fact, the last entry in this
20 document on Page 7307. On October 31st, Miss Parks
21 writes back to Miss Lowe and she proposes some
22 times that you're available to meet and she says
23 please advise as to the purpose of the meeting so
24 that we can prepare.

25 Do you remember whether the meeting

1 that Jacqueline Lowe asked for ever took place?

2 A. It did not take place as far as I know.

3 Q. Okay. So do you remember -- do you
4 remember what happened after Miss Parks sent this
5 response to Miss Lowe's message?

6 A. I don't believe we ever received a
7 confirmation of a date from Miss Lowe.

8 Q. Okay.

9 A. That included me.

10 Q. Okay. And you didn't hear -- you
11 didn't subsequently hear that Miss Parks had had a
12 discussion on this with DSS that you -- that you
13 weren't involved in, is that right?

14 A. That's correct, I did not hear.

15 Q. Okay.

16 A. That Miss Parks had sent them.

17 Q. And I know you testified earlier that
18 you don't -- you don't know who -- who would have
19 prepared this timeline, right?

20 A. I don't -- I don't recognize the
21 timeline.

22 Q. Okay. And do you have any -- any
23 understanding as to why Miracle Hill would have
24 maintained a timeline of events related to DSS
25 during this time period?

1 A. No, I don't know.

2 Q. Okay. You can put that aside. Okay.

3 The last thing -- last document I
4 wanted to look at for now is -- okay. This is
5 going to be Tab -- Tab 48, Serena. And this is
6 not -- this is not Bates stamped. This is the
7 subpoena that Plaintiffs served on Miracle Hill for
8 the production of documents and it's dated June
9 15th of 2020?

10 MR. MATTHEWS: Can you put that up on
11 the screen? We don't have a copy in the room, I
12 don't believe.

13 MS. JANSON: Let me -- I can do that.
14 Just one second.

15 MR. MATTHEWS: I may have one. Hold
16 on. I'm sorry, I don't.

17 MS. JANSON: Okay. No problem. Let me
18 just -- let me just get it up here. I'll share my
19 screen. So let me just share this.

20 COURT REPORTER: Kate, will that be
21 Exhibit 28? I didn't hear you say a number.

22 MS. JANSON: I think we're on 29.

23 COURT REPORTER: Okay.

24 MS. JANSON: Serena, does that sound
25 right to you?

1 MS. CANDELARIA: Sorry for the delay.
2 29 is right.

3 COURT REPORTER: Thank you.

4 (EXHIBIT 29, Letter dated 6/15/20 to
5 Miracle Hill Ministries, Incorporated c/o Richard
6 E. Ingram, Jr. from Nekki Shutt, with attachments,
7 was marked for identification.)

8 BY MS. JANSON:

9 Q. Okay. So let me just share this.
10 Okay. Are you able to see that, Miss Busha?

11 A. Yes.

12 Q. So this is just the cover letter. I'm
13 going to scroll down through so you can see what
14 we're looking at. This is the subpoena that
15 Plaintiffs served on Miracle Hill Ministries in
16 June of last year. And if I go a little farther
17 down -- my mouse is not cooperating. There we go.

18 So this says Schedule A, Miracle Hill
19 Ministries, and it has some definitions which I'm
20 not going to ask you about. And then we get down
21 to here, it says Requests For Production and it
22 lists a number of document requests. Have you ever
23 seen this document before?

24 A. I haven't seen this document. I've
25 seen a request for -- I saw a document that just

1 had requests for -- I don't know that it said
2 requests. I don't know if it was an exact copy of
3 this page or not, but it was a -- it was a document
4 that outlined all the things that we needed to
5 locate for the lawsuit.

6 Q. Okay. And were you -- were you
7 involved in efforts by Miracle Hill to search for
8 and collect documents related to this lawsuit in
9 response to the subpoena?

10 A. Yes.

11 Q. And what -- what was your -- what was
12 your involvement?

13 A. Looking for e-mails both in my -- my
14 records and in the former VP records of Beth
15 Williams that was the former VP.

16 Q. And was she -- was she no longer at
17 Miracle Hill when you were -- when you were
18 performing those searches?

19 A. Yes, that's correct.

20 Q. Okay.

21 A. She was not there.

22 Q. So you were looking in -- in your own
23 e-mails and in Miss Williams' e-mails for documents
24 that might be responsive to the requests, is that
25 right?

1 A. Yes.

2 Q. Do you know whether -- do you know
3 whether other members of Miracle Hill were also
4 asked to look in their -- in their e-mails for
5 documents?

6 A. Yes.

7 Q. Do you know generally who -- who was
8 requested to do that?

9 A. I know Brenda Parks and Sharon
10 Bettis -- Betts. And I believe that our IT
11 director at that time was asked to look.

12 Q. So certain people were asked to look in
13 their own e-mails and then the IT director was also
14 asked to run -- to run some system searches, is
15 that -- is that right?

16 A. I don't know exactly what he was asked
17 to do. I know he was included in helping us pull
18 the documents that we needed.

19 Q. Okay. And so did you, in fact, when
20 you looked in your e-mail and Miss Williams'
21 e-mail, did you locate documents and subsequently
22 provide those to counsel?

23 A. To be honest, I don't remember what I
24 located.

25 Q. Okay. Do you remember if you, in fact,

1 looked in your e-mail for documents that would have
2 been responsive to the subpoena?

3 A. Yes.

4 Q. Yes, you did do it?

5 A. Yes. I looked in -- I looked in my
6 documents.

7 Q. Okay. Were you asked to look in your
8 hard copy documents as well as in e-mails?

9 A. Yes.

10 Q. And did you -- did you do that?

11 A. Yes.

12 Q. And did you provide anything that you
13 found that might have been responsive to counsel?

14 A. I rarely have hard documents. I don't
15 think that I had anything in my hard documents.

16 Q. Were you also asked to look in your
17 electronic documents outside your -- outside your
18 e-mail, but other documents you might have had
19 stored electronically?

20 A. Yes.

21 Q. And did you do that?

22 A. Yes, I did.

23 Q. And did you provide anything that you
24 found there that might have been responsive to
25 counsel?

1 A. If I found something, I would provide
2 it, but I honestly cannot remember from a year ago
3 what I found.

4 Q. I know. Understood. To your
5 knowledge, is -- well, is there anything else that
6 you -- that you personally did to help search for
7 or collect documents in response to -- to
8 Plaintiffs' subpoena to Miracle Hill?

9 A. No.

10 Q. Are you aware of any others that
11 Miracle Hill or anyone else at Miracle Hill took to
12 search for or collect documents in response to
13 Plaintiffs' subpoena?

14 A. I know Brenda Parks, Sharon Betts were
15 asked. I know that Reid and Sandy were looking for
16 documents, but I don't know who else. And the IT
17 director. I don't know who else was asked to help.

18 MS. JANSON: Okay. All right. Well,
19 why don't we -- why don't we take a short break now
20 and just give me a minute to look over my notes and
21 then when we come back I hopefully will be finished
22 at least for now or close to finished. I don't
23 want to make any promises.

24 So why don't we go off the record and
25 we'll come back in -- is ten minutes enough for

1 folks or would you rather 15?

2 MR. COLEMAN: 15 might be safer if you
3 think you're getting close. I'm going to organize
4 myself so that it might be not necessary to take
5 another break.

6 MS. JANSON: Perfect. All right. So
7 let's say 3:15 we'll come back.

8 VIDEO TECHNICIAN: The time is 2:59 PM.
9 We are going off the record.

10 (A recess transpired.)

11 VIDEO TECHNICIAN: The time is 3:22 PM.
12 We are back on the record.

13 MS. JANSON: Miss Busha, thank you very
14 much for taking the time to talk to me today. I
15 don't have any further questions at this point.

16 THE WITNESS: Thank you.

17 EXAMINATION

18 BY MR. MATTHEWS:

19 Q. All right. I have one question just by
20 way of cleanup, if I might. This is Steve
21 Matthews.

22 There was some discussion earlier,
23 Miss Busha, having to do with the number of
24 licensed families with Miracle Hill. It was
25 unclear to me if the number 200 was the number of

1 licensed families at any given point in time or was
2 that the number of new licensed families who would
3 come on each year? Which is it? Did you get 200
4 new licensed families each year or was that the
5 aggregate that you had at a given point in time
6 when you were there?

7 A. No, it was not new families, it was the
8 aggregate for each year.

9 Q. Okay.

10 A. The average.

11 Q. All right.

12 A. Yeah.

13 MR. MATTHEWS: I have no other
14 questions.

15 MR. COLEMAN: Before I begin, I just
16 want to check with Terri, the court reporter. Can
17 you still hear me okay? We're using a single
18 microphone in this room.

19 COURT REPORTER: Yes, you're coming
20 through good, Miles. Thanks.

21 MR. COLEMAN: Okay. We're just trying
22 to avoid multiplicity of microphones.

23 COURT REPORTER: I appreciate that.

24 EXAMINATION

25 BY MR. COLEMAN:

1 Q. All right, Karen. Thank you for your
2 time today. I've got a handful of questions for
3 you, but I think -- I think the end is in sight.

4 A. Okay.

5 Q. There's light at the end of this tunnel
6 of the deposition.

7 Earlier today, sort of toward the
8 beginning of your testimony, you discussed what is
9 a CPA, what role does CPAs play. I'm going to --
10 I'm going to flesh that out a little bit and just
11 explore your answer.

12 Specifically, earlier this morning you
13 said -- or response to that, that the role of the
14 CPA was to place children in foster, close quote.
15 That's what I wrote down in my notes. I may not be
16 exact, but do you remember talking about that early
17 on?

18 A. Yes.

19 Q. And I really -- I know we -- you sort
20 of lapsed into that as kind of just a colloquialism
21 or a vernacular, but really CPAs don't have the
22 authority to place a child in a foster home, do
23 they?

24 A. That's correct.

25 Q. And who does?

1 A. DSS.

2 Q. Okay. So when you say that -- again,
3 just kind of informal language, that CPAs, CPAs
4 licensing, CPAs don't license foster homes, do
5 they?

6 MS. JANSON: Object to form.

7 BY MR. COLEMAN:

8 Q. You can answer.

9 A. DSS license -- actually license the
10 home. The CPA does the gathering of documents,
11 information, that DSS has the final authority to
12 license homes. A CPA cannot independently license
13 a home.

14 Q. And is the same thing true for actually
15 placing the child?

16 A. Yes, that's the -- the same is true.

17 Q. Only DSS can do that?

18 A. Only DSS can place the child, only DSS
19 can remove a child. The CPA facilitates the
20 placement.

21 Q. And we talked a little bit about that
22 later in the afternoon. I just want to make sure
23 that I understand. So if -- if DSS has a child in
24 foster care in the upstate needing placement,
25 someone from DSS will reach out to CPAs, is that

1 right?

2 A. Yes, that's correct.

3 Q. And then what does the CPA do in
4 response?

5 A. The CPA then looks for a family that
6 they license that can accommodate DSS's request.

7 Q. The CPA looks for a family that DSS
8 licensed, right?

9 A. Yes, that's right.

10 Q. If the CPA finds such a family, then
11 what does it -- what does it say back to DSS?

12 A. It lets DSS know that we have a family
13 that would be willing to take their place.

14 Q. And then it's up to DSS to decide
15 whether and where to place the child?

16 A. That's correct.

17 MS. JANSON: Object to the form.

18 BY MR. COLEMAN:

19 Q. I think you testified earlier today as
20 well that Miracle Hill has a case manager that was
21 assigned to both a foster care family and to the
22 child in their home, is that right?

23 A. Yes.

24 Q. Is that case manager someone on staff
25 at Miracle Hill?

1 A. Yes.

2 Q. And does the case manager have an
3 ongoing relationship with the foster family?

4 A. Yes.

5 Q. Does the case manager have an ongoing
6 relationship with the foster child while it's in
7 that family's home?

8 A. Yes.

9 Q. So if for some reason there was a
10 change to that case manager, that would disrupt
11 those relationships, right?

12 A. Yes.

13 MS. JANSON: Object to form.

14 BY MR. COLEMAN:

15 Q. If for some reason Miracle Hill stopped
16 being a CPA and those case managers could no longer
17 work with those families or children, that would
18 disrupt the case management relationship with the
19 child, right?

20 A. That's correct.

21 MS. JANSON: Object to form.

22 BY MR. COLEMAN:

23 Q. And with the family?

24 A. Correct.

25 MS. JANSON: Object to form.

1 BY MR. COLEMAN:

2 Q. And would that be true even if the
3 foster family for whatever reason moved to a
4 different CPA or they moved to working with DSS,
5 that move, either they continued serving as foster
6 parents, that would disrupt that case manager
7 relationship between them and with the child, is
8 that right?

9 A. That's correct.

10 MS. JANSON: Object to the form.

11 BY MR. COLEMAN:

12 Q. Do you remember earlier today, I
13 believe it was this morning, before lunch, we had
14 looked at a document, it was Miracle Hill's
15 doctrinal statement.

16 A. Yes.

17 Q. Do you remember looking at that? And I
18 think one of the questions you were asked was
19 whether it reflected Evangelical Protestants'
20 beliefs. Do you remember being asked or saying
21 anything about that?

22 A. I remember being asked.

23 Q. Okay. Do you know whether a Roman
24 Catholic foster parent could affirm and adhere to
25 that doctrinal statement?

1 A. I don't know.

2 Q. And I -- I should ask the question more
3 precisely, whether a -- it was unclear.

4 Do you know whether a Roman Catholic
5 foster parent or foster family like the one -- at
6 least one that serve Miracle Hill could sign and
7 agree to and adhere to Miracle Hill's doctrinal
8 statement?

9 A. Yes.

10 Q. And you know that's because there is at
11 least one family that's done so?

12 A. That's correct.

13 Q. Do you know whether the Roman Catholic
14 Diocese of South Carolina has ever looked at the
15 doctrinal statement and said it's consistent with
16 the Roman Catholic Orthodox?

17 A. I don't know.

18 Q. Okay. I suppose then that if, as you
19 just said, a practicing Roman Catholic could agree
20 to and sign that doctrinal statement, really
21 Miracle Hill's doctrinal statement is broader than
22 just Protestant beliefs, right?

23 MS. JANSON: Object to form.

24 THE WITNESS: Yes.

25 BY MR. COLEMAN:

1 Q. It would reflect Christian beliefs,
2 right?

3 A. Yes.

4 MS. JANSON: Object to form.

5 BY MR. COLEMAN:

6 Q. After Miracle Hill changed its policy,
7 I think in 2019, whether it's the summer,
8 approximately 2019, and it began with applications
9 from Roman Catholics, Orthodox and a broader group
10 of Christians, do you know whether every applicant,
11 both Roman Catholic and Protestant, were treated in
12 view the same by Miracle Hill?

13 A. That was our direction to the licensing
14 staff.

15 Q. And to the best of your knowledge, that
16 was true, it was done?

17 A. Yes. To the best of my knowledge it
18 was done.

19 Q. That the Roman Catholic wasn't somehow
20 in any way treated differently than a Protestant
21 Christian?

22 A. That's correct.

23 MS. JANSON: Object to form.

24 BY MR. COLEMAN:

25 Q. And when you say that's correct, it's

1 correct that they were not treated differently?

2 A. They were not treated differently.

3 Q. That policy change in 2019, that was a
4 sincere change of policy and viewpoint, right?

5 A. That's correct.

6 MS. JANSON: Object to the form.

7 BY MR. COLEMAN:

8 Q. We also looked earlier today at an
9 e-mail that was sent by Sharon Betts to the
10 Plaintiffs in this lawsuit. It was before the
11 lawsuit had been filed, they weren't Plaintiffs at
12 that time, but to Eden Rogers and Brandy Welch. Do
13 you remember looking at that e-mail?

14 A. Yes.

15 Q. And we talked about that for a little
16 while. I'm going to ask you a couple follow-up
17 questions about that. Hold on for a second.

18 One of the questions you were asked
19 while we were looking at that document was whether
20 Miracle Hill would work with a same sex marriage
21 couple. Do you remember that?

22 A. Yes.

23 Q. Another question you were asked around
24 that same time was whether Miracle Hill would work
25 with a prospective foster parent who identified as

1 LGBTQ. Do you remember that?

2 A. Yes.

3 Q. So I want to -- I want to make sure
4 that I've got clarity on the latter question. If a
5 prospective foster parent either submitted the
6 online inquiry form or came to an interest meeting
7 or called and said that they identify as LGBTQ but
8 that they believe the same doctrinal beliefs
9 memorialized in Miracle Hill's doctrine statement,
10 that the individual believes that marriage and
11 sexual activity is limited to marriage between two
12 individuals of different sexes and that they were
13 committed to only engaging in sexual conduct in
14 that context, only if married to a person of the
15 opposite gender and as a result they were committed
16 not to engaging in behaviors or actions of the same
17 sex, would Miracle Hill be willing to work with
18 that person?

19 MS. JANSON: Object to the form.

20 THE WITNESS: Yes.

21 BY MR. COLEMAN:

22 Q. So if -- if earlier today you said that
23 Miracle Hill would not work with an LGBTQ person,
24 what did you mean then -- because I feel like you
25 just now gave an answer that was -- that was

1 clearer. What did you mean previously when you
2 said that?

3 MS. JANSON: Object to the form.

4 THE WITNESS: If they were not living
5 according to the doctrinal statement.

6 BY MR. COLEMAN:

7 Q. Is it accurate to say that -- that the
8 distinction Miracle Hill draws is not based on
9 someone's identity or orientation, but instead is
10 based on their behaviors and actions?

11 A. Yes.

12 MS. JANSON: Object to the form.

13 BY MR. COLEMAN:

14 Q. And relatedly, Miracle Hill would draw
15 a distinction based on a person's beliefs in terms
16 of religion or doctrine?

17 A. Yes.

18 MS. JANSON: Object to the form.

19 BY MR. COLEMAN:

20 Q. When we looked at that e-mail from
21 Sharon Betts to Eden Rogers and Brandy Welch, I
22 think it was marked as Exhibit 13, the e-mail
23 referred Miss Rogers and Miss Welch to other
24 providers based on the fact that they were members
25 at a nonChristian church, is that right?

1 A. Yes.

2 Q. You said that you were not yourself
3 familiar with the distinctions, if any, between
4 Unitarian Universalists' beliefs in doctrine and
5 Christians' belief in doctrine, are you?

6 A. That's correct.

7 Q. Was there also a requirement of Miracle
8 Hill that not only must the applicant check the box
9 agreeing with or affirming the statement made, but
10 that the applicant also in addition had to be
11 active in a Christian church?

12 A. Yes.

13 Q. And so if Miss Rogers and Miss Welch
14 were members at a Unitarian church, then they
15 wouldn't have satisfied that criteria, would they?

16 A. That's correct.

17 MS. JANSON: Object to the form.

18 BY MR. COLEMAN:

19 Q. If Miss Rogers and Miss Welch in their
20 own depositions that a Unitarian Universalist's
21 belief is different from Christian beliefs and that
22 their personal beliefs are different from Christian
23 beliefs, you would have no reason to dispute that,
24 would you?

25 MS. JANSON: Object to form.

1 THE WITNESS: I'm sorry, what's the
2 question?

3 BY MR. COLEMAN:

4 Q. I'll try to ask it better.

5 If -- when Miss Rogers and Miss Welch
6 had their own depositions, if they admitted that
7 Unitarian Universalists' beliefs are different from
8 Christian beliefs, you would have no reason to
9 disagree with them about that, would you?

10 A. That's correct.

11 MS. JANSON: Object to the form.

12 BY MR. COLEMAN:

13 Q. And if they testified that their own
14 beliefs, individual, are different than Christian
15 rules, you would have no reason to dispute that,
16 would you?

17 A. That's correct.

18 MS. JANSON: Object to form.

19 BY MR. COLEMAN:

20 Q. When Brenda Parks received the online
21 preform from Miss Rogers and Miss Welch, she either
22 forwarded it to you or at least told you about it,
23 is that correct?

24 A. She told me about it.

25 Q. And that's because you had -- you had

1 asked to be informed of applications like that?

2 MS. JANSON: Object to the form.

3 THE WITNESS: Yes. We were -- we were
4 asked to be aware of applications that may be
5 coming from the universal -- from the Unitarian
6 church.

7 BY MR. COLEMAN:

8 Q. And when Brenda informed you, you
9 instructed her to contact Sandy Furnell, Reid
10 Lehman and legal counsel, is that right?

11 A. Yes. That's correct.

12 Q. Is that because you form a lookout
13 because Miracle Hill was aware that you and other
14 groups like that were actively looking for
15 Plaintiffs to apply to Miracle Hill in hopes of
16 generating a lawsuit?

17 A. Yes.

18 MS. JANSON: Object to the form.

19 BY MR. COLEMAN:

20 Q. Is it also because you were aware that
21 the Unitarian Universalists church in Greenville
22 had hosted an interest meeting for people
23 interested in applying to Miracle Hill in hopes of
24 being referred elsewhere?

25 A. Yes.

1 MS. JANSON: Object to the form.

2 BY MR. COLEMAN:

3 Q. We talked a little bit earlier today
4 about Miracle Hill's practices and its policies and
5 manuals relating to religious exercise and
6 activities that -- that children in foster care
7 could, if they wished, participate in. Do you
8 remember talking about that?

9 A. Yes.

10 Q. A good bit of what we talked about
11 earlier today -- when I say we, what you talked
12 about, I was just listening at that point, had to
13 do with Miracle Hill's residential foster care,
14 right?

15 A. Yes.

16 Q. Is residential foster care or sometimes
17 called group homes or group foster care, is that
18 right?

19 A. That's correct.

20 Q. And is that different from foster care
21 that Miracle Hill does as a CPA?

22 A. Very different, yes.

23 Q. Are there different licenses to operate
24 residential care versus a CPA foster care?

25 A. Yes.

1 Q. Does Miracle Hill internally -- let me
2 clarify because Miracle Hill doesn't offer
3 residential care any longer, right?

4 A. That's correct.

5 Q. At the time, let's say from 2017
6 through approximately 2020, did Miracle Hill
7 internally have different sets of documents that
8 relate to residential foster care versus CPA foster
9 care?

10 A. Yes.

11 MS. JANSON: Object to form.

12 BY MR. COLEMAN:

13 Q. To your knowledge, in 2017 and 2018
14 when DSS contacted Miracle Hill with questions
15 about Miracle Hill's practice of working with like
16 faith foster parents, did that issue and the
17 communications with DSS have to do with the CPA
18 foster care side of the ministry?

19 A. That was my understanding, yes.

20 MS. JANSON: Object to the form.

21 BY MR. COLEMAN:

22 Q. And were those issues and
23 communications completely unrelated to Miracle
24 Hill's residential group home license?

25 A. Yes.

1 MS. JANSON: Object to the form.

2 BY MR. COLEMAN:

3 Q. To the best of your knowledge, when
4 South Carolina DSS granted Miracle Hill a temporary
5 or provisional six-month license, that had only to
6 do with Miracle Hill's CPA operation, correct?

7 A. Correct.

8 Q. And conversely, it did not have
9 anything to do with residential or group?

10 A. That's correct.

11 MS. JANSON: Object to form.

12 BY MR. COLEMAN:

13 Q. When Governor McMaster issued his
14 executive order relating to faith-based CPAs, that
15 had only to do with CPAs, right?

16 A. Correct.

17 MS. JANSON: Object to form.

18 BY MR. COLEMAN:

19 Q. It had no impact or effect or relation
20 to residential foster care?

21 MS. JANSON: Object to form.

22 BY MR. COLEMAN:

23 Q. Is that right?

24 A. That's correct.

25 Q. And when the United States Health and

1 Admin Services, HHS, issued a waiver to South
2 Carolina, that had only to do with CPA operations,
3 right?

4 A. Correct.

5 MS. JANSON: Object to form.

6 BY MR. COLEMAN:

7 Q. And not residential foster care?

8 A. Correct.

9 Q. When a foster child is placed into a
10 foster home that worked with Miracle Hill as a CPA,
11 that foster child is never -- well, coerced to
12 engage in religious conduct or activity?

13 MS. JANSON: Object to form.

14 THE WITNESS: That's correct.

15 BY MR. COLEMAN:

16 Q. Correct that they are not?

17 A. They are not. To the best of my
18 knowledge they are not.

19 Q. And that's a good point. Miracle
20 Hill's policy and instruction is that they should
21 not?

22 A. That's correct.

23 MS. JANSON: Object to form.

24 BY MR. COLEMAN:

25 Q. You obviously can't be present always

1 in all the homes.

2 A. That's right.

3 Q. But to the best of your knowledge. Is
4 Miracle Hill's policy and instruction and practice
5 that children in foster care in a foster home that
6 works with Miracle Hill and its CPA, as such
7 children are not in any way penalized for declining
8 to participate in religious activity?

9 MS. JANSON: Object to form.

10 THE WITNESS: Correct, they are not
11 penalized for not participating.

12 BY MR. COLEMAN:

13 Q. And they're not rewarded for
14 participating?

15 A. That's correct.

16 MS. JANSON: Object to form.

17 BY MR. COLEMAN:

18 Q. They're not given any better treatment
19 or worse treatment depending on whether they do or
20 don't participate or respond?

21 A. That's correct.

22 MS. JANSON: Object to form.

23 BY MR. COLEMAN:

24 Q. And if at any time a child in foster
25 care or that child's biological parents or family

1 of origin request that the child not be exposed to
2 or engage in religious activity, conduct or
3 instruction, Miracle Hill's instruction to those
4 families is to honor the wishes of the child and
5 the biological family, is that right?

6 A. That's correct.

7 MS. JANSON: Object to form. I'm not
8 trying to talk over you, Miss Busha, but I -- I do
9 need time to get my objections on the record, so
10 maybe you could kind of just pause briefly after
11 Mr. Coleman's question.

12 THE WITNESS: Okay.

13 BY MR. COLEMAN:

14 Q. We looked at one or more documents
15 earlier today that involved specific examples of
16 children in foster care in either Miracle Hill's
17 residential home or in a -- in a family, whether
18 they were with Miracle Hill, I don't remember,
19 where the child or the parents had a specific
20 request or instruction regarding the child's
21 religious practice. Do you remember that?

22 A. Yes.

23 Q. In every instance like that, whether
24 you looked at today or any others that you're aware
25 of, did Miracle Hill always honor those requests or

1 instructions?

2 A. To the best of my knowledge, yes.

3 Q. Did Miracle Hill always make sure
4 through whatever internal accommodation or
5 arrangement was necessary that the child was able
6 to attend the house of worship that they or their
7 biological family requested?

8 A. Yes.

9 Q. We also looked at a document earlier
10 today where it referred to Miracle Hill's view that
11 foster parent rights or people in a position of,
12 quote, spiritual influence. Do you remember
13 looking at that?

14 A. Yes. Yes.

15 Q. And I think you told us you -- you were
16 not aware of that phrase had ever been defined in
17 writing anywhere, is that right?

18 A. That's correct.

19 Q. Can spiritual influence mean more than
20 preaching at somebody?

21 A. Yes.

22 Q. Can it mean modeling love?

23 A. Yes.

24 MS. JANSON: Object to form.

25 COURT REPORTER: I'm sorry, Miles. You

1 said modeling what?

2 MR. COLEMAN: Love.

3 MS. JANSON: Object to the form.

4 BY MR. COLEMAN:

5 Q. Could it mean offering hope?

6 A. Yes.

7 MS. JANSON: Object to form.

8 BY MR. COLEMAN:

9 Q. Could it mean demonstrating humility?

10 MS. JANSON: Object to form.

11 THE WITNESS: Yes.

12 BY MR. COLEMAN:

13 Q. Can spiritual influence mean a lot more
14 than just proselytizing or evangelizing somebody?

15 A. Yes.

16 MS. JANSON: Object to form.

17 BY MR. COLEMAN:

18 Q. So it is possible, right, for a foster
19 parent to be a person of spiritual influence and
20 never once try to convert a child, right?

21 MS. JANSON: Object to form.

22 BY MR. COLEMAN:

23 Q. It could likewise be possible --

24 COURT REPORTER: I'm sorry. Miles, I'm
25 sorry. I'm sorry, Miles. I didn't get her answer

1 over Kate's objection to the last question.

2 BY MR. COLEMAN:

3 Q. Do you remember what your answer was?

4 A. I don't remember the question.

5 Q. I'll ask the question again. It's
6 possible, right, that a foster parent can be a
7 person of spiritual influence without ever once
8 trying to evangelize to convert a child, right?

9 MS. JANSON: Same objection.

10 THE WITNESS: That's correct.

11 BY MR. COLEMAN:

12 Q. We looked earlier today at some
13 documents from 2019 that had to do with a contract
14 solicitation that SCDSS sent out to a variety of
15 CPAs and residential group homes, is that right?

16 A. Yes.

17 Q. And that was a poorly worded question.
18 Let me back it up.

19 Do you remember looking at contract
20 solicitation documents and communications from
21 around 2019?

22 A. Yes.

23 Q. Do you recall whether they had to do
24 with either residential care or CPA or both?

25 A. Both.

1 Q. Okay. One of those was an emergency
2 contract, right?

3 A. Yes.

4 Q. And I think you testified that that was
5 the first contract Miracle Hill had ever had with
6 SCDSS, is that right?

7 MS. JANSON: Object to form.

8 THE WITNESS: No. The first contract
9 with CPA.

10 BY MR. COLEMAN:

11 Q. Sorry. I may have asked the question
12 poorly.

13 A. Okay.

14 Q. Explain your answer and I'll try again.

15 A. So Miracle Hill had contracts with DSS
16 for residential care. We could not have a contract
17 to be a CPA. We only had a license.

18 Q. Thank you. I don't mean to ask you to
19 pretend to be a lawyer.

20 A. Okay.

21 Q. Prior to this emergency contract, were
22 there ever a unwritten -- unwritten contract or
23 agreement or practice between SCDSS and Miracle
24 Hill for CPA services?

25 MS. JANSON: Object to the form.

1 THE WITNESS: There was a -- an
2 agreement with regard to an administrative fee that
3 DSS would pay Miracle Hill ten dollars per child
4 per day.

5 BY MR. COLEMAN:

6 Q. Was that for case management --

7 A. Yes.

8 Q. -- services?

9 A. Yes.

10 Q. And that predated the emergency
11 contract?

12 A. That's right.

13 Q. And you're not -- you don't think of
14 that -- the ten dollar per child per day, you don't
15 think of that as a contract because it was never in
16 a formal written document signed and countersigned?

17 MS. JANSON: Object to form.

18 THE WITNESS: That's correct.

19 MR. COLEMAN: Give me just a moment. I
20 think those are all the questions I have for right
21 now.

22 THE WITNESS: Thank you.

23 MS. JANSON: Nothing further from me.
24 Thank you again, Miss Busha, for your time.

25 THE WITNESS: Thank you.

1 MS. NEWMAN: And this is Christie
2 Newman on behalf of the federal defendants. No
3 questions. Thank you for your time.

4 THE WITNESS: You're welcome.

5 VIDEO TECHNICIAN: Okay. We are off
6 the record at 3:55 PM. This concludes today's
7 testimony given by Freddie Karen Busha. Total
8 number of media units used was four and will be
9 retained by Veritext.

10 (WHEREUPON, the proceedings concluded
11 at 3:55 PM.)

12 (The witness, after having been advised
13 of her right to read and sign this transcript, does
14 not waive that right.)

15

16

17

18

19

20

21

22

23

24

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFICATE OF REPORTER

I, Terri L. Brusseau, Notary Public for the State of South Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 24th day of June, 2021 at Charleston, Charleston County, South Carolina.



Terri L. Brusseau
My Commission expires
April 5, 2026.

1 I N D E X

2		Page	Line
3	FREDDIE KAREN BUSHA	7	14
4	EXAMINATION	7	16
5	BY MS. JANSON		
6	EXAMINATION	179	17
7	BY MR. MATTHEWS		
8	EXAMINATION	180	24
9	BY MR. COLEMAN		
10	CERTIFICATE OF REPORTER	206	1

11 E X H I B I T S

12		Page	Line
13	EXHIBIT 1, Letter dated	11	3
14	6/15/21 from Nekki Shutt, with		
15	attached Notice of Taking		
16	Deposition of Karen Busha Via		
17	Remote Means		
18	EXHIBIT 2, Miracle Hill	25	18
19	Ministries Doctrinal		
20	Statement,		
21	MIRACLE_HILL_SUBP_00375		
22	EXHIBIT 3, Miracle Hill	26	18
23	Ministries' Spiritual Identity		
24	FAQ's,		
25	MIRACLE_HILL_SUBP_012783 to		

1	012784		
2	EXHIBIT 4, E-mail chain dated	30	8
3	1/3/19 to Sharon Betts and		
4	Brenda Parks from Karen Busha,		
5	MIRACLE_HILL_SUBP_004623 to		
6	004626		
7	EXHIBIT 5, E-mail chain dated	34	21
8	3/8/19 to Ken Kruihof from		
9	Karen Busha,		
10	MIRACLE_HILL_SUBP_002366 to		
11	002367		
12	EXHIBIT 6, Document entitled	37	23
13	Miracle Hill Ministries		
14	Strengthens Christian Identity		
15	by Opening Foster Programs to		
16	Catholic Foster Parents,		
17	MIRACLE_HILL_SUBP_000244 to		
18	000245		
19	EXHIBIT 7, E-mail chain dated	51	10
20	9/24/19 to Karen Busha and Ken		
21	Kruihof from Reid Lehman,		
22	MIRACLE_HILL_SUBP_004467 to		
23	004470		
24	EXHIBIT 8, E-mail chain dated	57	11
25	12/19/19 to Brenda Parks from		

1 Karen Busha,
 2 MIRACLE_HILL_SUBP_002572 to
 3 002574
 4 EXHIBIT 9, E-mail chain dated 60 9
 5 1/9/20 to Brenda Parks and
 6 Karen Busha from Reid Lehman,
 7 MIRACLE_HILL_SUBP_002576 to
 8 002577
 9 EXHIBIT 10, E-mail dated 65 24
 10 4/28/19 to Sharon Betts,
 11 Brenda Parks and Yvette Bates
 12 from Brandy Welch,
 13 MIRACLE_HILL_SUBP_000593 to
 14 000594
 15 EXHIBIT 11, Statement, 68 17
 16 MIRACLE_HILL_SUBP_006977
 17 EXHIBIT 12, E-mail chain dated 71 2
 18 5/1/19 to Sharon Betts, Reid
 19 Lehman, Karen Busha and Brenda
 20 Parks from Sandra Furnell,
 21 MIRACLE_HILL_SUBP_012572 to
 22 12573
 23 EXHIBIT 13, E-mail dated 73 8
 24 5/1/19 from Sharon Betts,
 25 MIRACLE_HILL_SUBP_000592

1	EXHIBIT 14, E-mail chain dated	86	1
2	11/26/19 to Karen Busha from		
3	Karen Busha,		
4	MIRACLE_HILL_SUBP_006206 to		
5	006211		
6	EXHIBIT 15, E-mail dated	100	13
7	11/26/19 to Bradley Holland		
8	from Karen Busha,		
9	MIRACLE_HILL_SUBP_006220		
10	EXHIBIT 16, E-mail chain dated	103	15
11	11/27/19 to Bradley Holland		
12	from Karen Busha,		
13	MIRACLE_HILL_SUBP_006221 to		
14	006222		
15	EXHIBIT 17, E-mail chain dated	111	11
16	1/4/18 to Lisa Yerrick from		
17	Marques Petty,		
18	MIRACLE_HILL_SUBP_001319 to		
19	001323		
20	EXHIBIT 18, Miracle Hill	117	14
21	Ministries Agreement with		
22	Doctrinal Statement		
23	EXHIBIT 19, E-mail dated	122	15
24	12/3/20 to Brenda Parks,		
25	Sharon Betts, Jacqueline		

1 Rector and Jane Pulido from
 2 Karen Busha,
 3 MIRACLE_HILL_SUBP_006020 to
 4 006022
 5 EXHIBIT 20, E-mail chain dated 128 9
 6 10/11/19 to Karen Busha from
 7 Dawn Barton, 002384 to 002386
 8 EXHIBIT 21, E-mail chain dated 132 20
 9 10/15/19 to Reid Lehman from
 10 Tony Catone,
 11 MIRACLE_HILL_SUBP_003515 to
 12 003518
 13 EXHIBIT 22, Document entitled 136 10
 14 PAFCAF Member Comments -
 15 October 2019,
 16 Section-by-Section Discussion,
 17 MIRACLE_HILL_SUBP_002470 to
 18 002487
 19 EXHIBIT 23, E-mail chain dated 136 14
 20 11/20/19 to Karen Busha from
 21 Paula M. Fendley,
 22 MIRACLE_HILL_SUBP_002462 to
 23 002469
 24 EXHIBIT 24, Document entitled 144 17
 25 Protest Decision,

1	MIRACLE_HILL_SUBP_008240 to		
2	008249		
3	EXHIBIT 25, Emergency Contract	147	18
4	Between The South Carolina		
5	Department of Social Services		
6	and Miracle Hill Ministries,		
7	Inc., MIRACLE_HILL_SUBP_005953		
8	to 005972		
9	EXHIBIT 26, State of South	150	23
10	Carolina Change Order #1,		
11	MIRACLE_HILL_SUBP_005882 to		
12	005883		
13	EXHIBIT 27, E-mail chain dated	156	21
14	3/29/19 to Karen Busha from		
15	Stephen Taylor,		
16	MIRACLE_HILL_SUBP_005948 to		
17	005952		
18	EXHIBIT 28, E-mail chain	160	13
19	entitled DSS Timeline,		
20	MIRACLE_HILL_SUBPOENA_007303		
21	to 007307		
22	EXHIBIT 29, Letter dated	174	4
23	6/15/20 to Miracle Hill		
24	Ministries, Incorporated c/o		
	Richard E. Ingram, Jr. from		
25	Nekki Shutt, with attachments		

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ERRATA SHEET
VERITEXT/NEW YORK REPORTING, LLC

CASE NAME: Rogers, Et Al. v. U.S. Dept. Of Health And Human Servs.,
Et Al.

DATE OF DEPOSITION: 6/21/2021

WITNESSES' NAME: Freddie Karen Busha

PAGE	LINE (S)	CHANGE	REASON

Freddie Karen Busha

SUBSCRIBED AND SWORN TO BEFORE ME
THIS ____ DAY OF _____, 20__.

(NOTARY PUBLIC)

MY COMMISSION EXPIRES:

[& - 14]

Page 1

&	002576 60:11 209:7	006222 103:17 210:14	10:15 56:18
& 2:7 3:15 6:19,23 7:19	002577 60:11 209:8	006977 68:18 209:16	10:30 56:24
0	003515 132:22 211:11	007303 160:14 212:20	10:45 103:24
000244 38:1 208:17	003518 132:22 211:12	007307 160:14 212:21	11 68:12,17 144:7 144:11 157:10 207:13 208:24 209:15 210:15
000245 38:1 208:18	00375 25:19 207:21	008240 144:18 212:1	11/20/19 136:15 211:20
000375 25:16	004467 51:12 208:22	008249 144:18 212:2	11/26/19 86:2 100:13 210:2,7
000592 73:9 209:25	004470 51:12 208:23	012572 71:5 209:21	11/27/19 103:16 210:11
000593 66:1 209:13	004623 30:10 208:5	012783 26:17,19 26:22 207:25	111 210:15
000594 66:1 209:14	004626 30:10 208:6	012784 26:20 208:1	117 210:20
001319 111:13 210:18	005882 150:24 212:11	01567 1:6 6:4	11th 128:8 133:13
001323 111:13 210:19	005883 150:25 212:12	1	12 70:25 71:2 209:17
002366 34:23 208:10	00593 65:19	1 5:24 11:3,9 12:1 24:14,19 68:11	12/19/19 57:11 208:25
002367 34:23 208:11	005948 156:23 212:16	1 11:3,9 12:1 24:14,19 68:11	12/3/20 122:15 210:24
002384 128:10 211:7	005952 156:23 212:17	1 117:6 150:22,24 153:14 207:10,13 210:1 212:10	120 2:16
002386 128:11 211:7	005953 147:21 212:7	1/3/19 30:8 208:3	1201 3:21
002462 136:16 211:22	005972 147:21 212:8	1/4/18 111:11 210:16	122 210:23
002469 136:16 211:23	006020 122:18 211:3	1/9/20 60:9 209:5	12572 71:1
002470 136:12 211:17	006022 122:18 211:4	10 65:20,24 77:12 208:19 209:9 211:13	12573 71:5 209:22
002487 136:12 211:18	006206 86:3 210:4	10/11/19 128:10 211:6	128 211:5
002572 57:13 209:2	006211 86:3 210:5	10/15/19 132:21 211:9	13 73:5,7,8 78:8 129:12 190:22 209:23 210:6 212:18
002574 57:13 209:3	006220 100:15 210:9	100 210:6	1319 111:8
	006221 103:17 210:13	10005 2:16	132 211:8
		10019 2:10	1320 3:16 111:25
		103 210:10	136 211:13,19
			14 57:7 85:22 86:1 91:23 92:25 97:11 101:4 207:3 210:1 210:20 211:19

144 211:24	153:12	2020 18:5 42:18,21	2470 138:2,6
147 212:3	2	60:8 122:3,14	2474 138:23 139:8
15 30:4 100:9,13 101:2 160:2 179:1 179:2 210:6,10,23	2 15:21 25:17,18 49:11 50:4 70:5 155:10 207:18 209:17	123:1,17 125:6 151:10,23 173:9 195:6	2475 138:24 139:15 140:19
150 212:9	20 65:17 128:6,9 137:18 139:24 140:10 211:5,8 213:22	2021 1:22 5:23 12:3 16:16 117:20 147:3 206:10	24th 51:9 206:10
156 212:13	200 63:12 64:3,5 64:10 179:25 180:3	2026 206:19	25 25:14 147:14,18 152:2 154:15 158:8 207:18 212:3
15th 12:3 132:19 173:9	2017 195:5,13	206 207:10	2572 57:8
16 34:16 103:9,15 207:4 210:10	2018 17:6 18:15 111:10 112:19 143:9 144:16 195:13	20th 134:22 144:16	2573 57:20
160 212:18	2019 30:7 34:20 37:9 38:11,14,23 39:8 42:23 51:9 52:7 57:10 65:12 65:23 68:3 71:11 73:2,13,17,19 85:25 86:13 93:2 100:12,22 101:2 102:12 103:12 128:8 129:2 132:19 134:22 136:11 137:6,18 138:3 143:12,14 148:14,15,20,23 148:24 149:8 150:17 153:12,13 156:20 161:3 162:16 163:12 167:22 169:12 170:19 187:7,8 188:3 202:13,21 211:15	20th 134:22 144:16	2576 60:5
17 111:6,11 207:6 209:15 210:15 211:24		21 1:22 18:17 73:5 132:17,20 208:7 211:8 212:13	26 86:13 93:2 100:12,22 101:2 150:20,23 152:17 155:25 207:22 212:9
174 212:22		212 2:11,17	26th 85:25
179 207:6		21906 206:17	27 37:16 156:17,21 158:18 159:23 212:13
17th 3:16		21st 5:23 137:6	27th 103:12 161:3 161:14
18 116:5 117:12,14 118:10 207:18,22 210:20 212:3		22 70:24 134:19 135:9,13,14,15 136:10 138:1 140:8 166:4,5,17 211:13	27th 103:12 161:3 161:14
180 207:8		22nd 3:21	28 160:11,13 164:23 167:10 173:21 212:18
19 5:5 57:10 122:10,15 156:17 210:23		23 26:14 136:6,14 136:19 141:11 208:12 211:19 212:9	28.1. 150:20
19.1. 147:14		2366 34:18 35:4 38:21 40:17	282-2100 3:9
1964 155:10		2367 41:3,15	28th 65:23 148:15 163:12 167:22
1977 16:9		2384 128:5 139:24	29 173:22 174:2,4 212:22
1979 16:7		239,075 152:14	29201 3:17
1981 155:17 157:12 158:14		23rd 116:22 117:20	29201-3232 3:22
1987 16:2		24 144:8,14,17 207:8 209:9 211:24	29601 2:2 3:9
1998 15:21		244 37:18 47:6	29678 8:2
19th 2:16		2462 134:21 136:22 141:11	29th 65:22 148:14 156:19 169:11
1:15 114:25,25 115:2			2:59 179:8
1:17 115:7			2nd 2:1
1:26-27 117:5			
1st 71:11 73:2,13 73:17,19 129:2 148:20,23 149:8			

[3 - accommodations]

Page 3

3	46 122:9 4623 30:5 40:14 4625 31:24 47 10:20 474-1989 2:11 48 173:5 49 128:4 4th 111:10	6/21/2021 213:3 60 209:4 6020 122:12 6206 85:23 97:11 6207 93:1,5 6220 100:11 6221 103:10 65 209:9 68 209:15 6977 68:13 6:19 1:6 6:4	9
3 26:14,18 129:12 138:25 139:8,15 145:4 207:13,22 3/29/19 156:21 212:14 3/8/19 34:21 208:8 30 5:16 28:2 51:5 166:2 208:2 30th 150:16 151:10,23 153:13 170:4 31 160:9 31st 161:3 171:20 33 132:16 34 208:7 3515 132:18 37 208:12 375 50:5 70:6 3:15 179:7 3:22 179:11 3:55 205:6,11 3rd 30:7 122:14	5	7 51:7,10 111:7 207:3,4 208:19 700 3:8 700,000 153:5 704 8:1 71 209:17 73 209:23 7303 160:10 7305 171:9 7307 171:20 75 44:13 779-3080 3:22 799-2000 3:17	9 60:6,9 105:18,19 155:4 157:9,21 158:1,9 209:4,4 211:5 9/24/19 51:10 208:20 956,300 152:25 99 44:20 9:00 13:9 9:02 1:23 5:23 9th 60:8
4	5 34:17,21 38:20 39:15 40:6,16 206:19 208:7 5/1/19 71:2 73:8 209:18,24 51 116:8 208:19 55 3:8 563 155:2 57 57:19 152:6 208:24 5857 150:21 592 73:6 78:10 593 77:12 5948 156:18 5950 157:4 5953 147:15 5957 152:3 5963 158:9 5968 148:11 5969 148:12 5th 38:10	8	a
4 30:3,8 40:7,13 208:2 212:22 4/28/19 65:24 209:10 40 136:3,6 166:2 40.1 134:19 135:16 136:2 41 85:21 42 100:9 43 103:9 44 43:25 53:1 60:3 4467 51:6 4468 53:2 4469 51:19 45 155:11	6	8 57:9,11 105:18 105:19 208:2,24 209:23 80 155:12 803 3:17,22 809-8585 2:17 8240 144:15 8242 146:13 825 2:10 857 152:5 86 210:1 864 3:9 8th 34:20 38:23	abbreviation 18:25 ability 10:11,15 82:14 93:12 131:10 able 14:5 116:24 174:10 200:5 absent 90:22 abuse 20:11 accept 97:13 accepted 77:5,16 access 24:3 134:11 134:16 accessed 117:19 accommodate 9:5 87:10 94:22 97:8 107:2 108:18 183:6 accommodated 85:16 107:4,17 108:10 109:2 accommodating 97:21 98:3 accommodation 102:6 200:4 accommodations 101:20

<p>accompany 60:25 62:7,10</p> <p>account 32:18</p> <p>accountable 32:7</p> <p>accredit 126:15</p> <p>accreditation 16:23 17:25 18:2 18:4 124:24 126:9 126:13,16</p> <p>accredited 18:1</p> <p>accurate 10:8 53:11 190:7 206:4</p> <p>acronym 126:17</p> <p>act 154:25 155:10 155:17 157:12 158:14</p> <p>action 6:10</p> <p>actions 189:16 190:10</p> <p>active 32:3 67:15 191:11</p> <p>actively 99:12,23 193:14</p> <p>activities 92:21 155:19 157:14 194:6</p> <p>activity 189:11 197:12 198:8 199:2</p> <p>adamant 107:1</p> <p>added 137:9,10,14 157:21 158:3,19 159:9</p> <p>adding 145:11</p> <p>addition 87:11 89:4 159:4 191:10</p> <p>additional 52:1 66:25 163:16 167:12</p> <p>address 7:25 169:23</p>	<p>addressed 69:7</p> <p>adhere 28:21 145:9 185:24 186:7</p> <p>adheres 26:5</p> <p>adjusting 59:3,9</p> <p>admin 197:1</p> <p>administer 6:9</p> <p>administration 1:11,12,14 3:2,3,4</p> <p>administrative 124:4 169:18 204:2</p> <p>admissible 5:14</p> <p>admission 45:16</p> <p>admitted 45:16 192:6</p> <p>adult 163:7</p> <p>advance 14:12,17 14:23 39:2 116:9</p> <p>advertise 22:12</p> <p>advertisement 22:14</p> <p>advice 159:4</p> <p>advise 171:23</p> <p>advised 60:24 120:4 205:12</p> <p>affect 141:4 163:17 167:13</p> <p>affiliations 6:14</p> <p>affirm 185:24</p> <p>affirming 191:9</p> <p>affixed 206:9</p> <p>afternoon 182:22</p> <p>age 129:16 139:11</p> <p>agencies 18:20,20 129:23 131:7</p> <p>agency 19:2 20:17 20:20 118:13 129:13,18,25 130:9,19 139:1,9</p>	<p>139:18 140:21 163:15 167:11 168:18 171:15</p> <p>agencys 145:8</p> <p>ages 105:19</p> <p>aggregate 180:5,8</p> <p>ago 15:6,7 178:2</p> <p>agree 26:9 49:8 50:25 65:5 96:13 131:11 186:7,19</p> <p>agreed 64:24 77:2 77:18</p> <p>agreeing 191:9</p> <p>agreement 74:6 75:5,21 117:15,25 118:11 203:23 204:2 210:21</p> <p>agrees 155:6</p> <p>ahead 114:19 138:22</p> <p>aimee 47:10,15,23 48:10,14</p> <p>al 213:2,2</p> <p>alcohol 18:17,18</p> <p>alex 1:9</p> <p>align 25:9 74:11 74:21 75:8 76:2</p> <p>aligns 74:25</p> <p>alj 137:20 141:12 141:14</p> <p>allegedly 145:14</p> <p>amend 151:8</p> <p>amended 156:1</p> <p>america 20:14</p> <p>analysis 145:1</p> <p>anderson 16:8</p> <p>andy 4:2</p> <p>announced 47:3</p> <p>announcing 39:3 49:1</p>	<p>answer 8:11,14,16 8:20,21 9:7 26:2 27:15,21 28:4 34:13 48:1,4 67:12 69:25 70:21 80:18 81:4 92:5 159:6,10,13 181:11 182:8 189:25 201:25 202:3 203:14</p> <p>answering 63:22</p> <p>answers 53:4,7,8 53:10,16</p> <p>anxious 170:7 171:3</p> <p>anybody 9:15,20</p> <p>anyway 166:22</p> <p>apart 13:14,18 19:4 83:25 150:11</p> <p>apologies 139:7</p> <p>apologize 93:8 94:8</p> <p>app 37:6</p> <p>appear 66:7 73:23 76:6 135:12 138:10</p> <p>appearance 6:16</p> <p>appearances 2:4 6:14</p> <p>appearing 1:21,25 2:8,9,14,15 3:8,16 4:2,4</p> <p>appears 27:3 68:15 81:7 88:8 90:1 101:7 112:6 158:22 160:24 161:9</p> <p>appli 23:2</p> <p>applicable 150:4 155:7</p>
--	--	--	--

[applicant - azar]

Page 5

<p>applicant 33:22,24 36:4 40:7,10 52:24 53:3 54:9 54:14 55:20,23 56:3,5,12 61:1,22 61:23 62:8,11 64:24 72:4,5 109:10 187:10 191:8,10</p> <p>applicants 36:6,12 40:23 52:4,8,14,19 52:23,23 53:18 54:17 55:14 60:23 61:15,16,18 62:2,3 65:5 108:3</p> <p>application 22:18 22:24 23:2 34:8 36:9,15,23 37:4 39:24 40:1,8 54:7 54:22 55:21 56:3 56:7 67:8 72:13 76:4,11,16 77:3,5 78:18 79:9 80:9 81:15 82:3 125:12 129:15 130:10 139:10</p> <p>applications 53:20 187:8 193:1,4</p> <p>applied 130:17 164:6</p> <p>applies 129:24</p> <p>apply 23:4 66:19 193:15</p> <p>applying 37:11 39:9 193:23</p> <p>appreciate 23:24 180:23</p> <p>appreciated 71:23</p> <p>appreciation 23:24</p>	<p>appropriate 20:8 20:9 96:13,19,25 97:6</p> <p>approval 35:25</p> <p>approximate 15:22</p> <p>approximately 13:6 43:22 44:18 63:9,25 64:1,14 69:1 126:4 162:15 187:8 195:6</p> <p>april 65:22,22 68:3 116:22 117:20 206:19</p> <p>area 22:6 81:6 100:3</p> <p>arizona 16:24 126:18</p> <p>arrange 171:13</p> <p>arrangement 200:5</p> <p>article 153:14 155:4 157:9,21 158:1,9</p> <p>aside 100:9 141:22 159:18 160:1 173:2</p> <p>asked 27:4 52:8 54:15 63:25 66:18 105:13,22 106:12 172:1 176:4,11,12 176:14,16 177:7 177:16 178:15,17 185:18,20,22 188:18,23 193:1,4 203:11</p> <p>asking 8:14,22,25 63:22 71:24 92:3 142:20 167:24,25</p> <p>asks 47:21 67:8</p>	<p>asserting 80:20</p> <p>assigned 21:15 23:17,18 24:6,9,10 24:12,18,19 183:21</p> <p>assistance 155:20 157:16</p> <p>assistant 1:12,14 3:3,4,7 169:16,18</p> <p>assisted 23:19 124:14</p> <p>associate 16:7</p> <p>association 5:3 127:4</p> <p>assume 8:24 145:1</p> <p>assuming 73:17 80:2 132:2</p> <p>attached 11:4 157:6 207:15</p> <p>attachment 123:4 123:15</p> <p>attachments 122:24 174:6 212:25</p> <p>attempt 34:1</p> <p>attend 31:19 74:4 83:5,17,20 84:2 85:17 89:3,5,7 90:6,8 91:13,16,18 94:5 99:25 102:24 103:5 106:2 113:13 167:18 200:6</p> <p>attended 35:18 76:17,25 83:24 106:13</p> <p>attending 6:13 82:16 96:5 100:6 104:18 105:13,23 106:7,7,9,16,18</p>	<p>attention 36:9,16 36:18,23</p> <p>attorney 3:7 6:17 8:18 47:21,24 48:3 79:22 80:12 87:9 133:18 146:5 159:3,11</p> <p>attorney's 3:6</p> <p>attorneys 2:5 3:1 3:11,19 159:19</p> <p>audibly 8:11</p> <p>audio 11:15</p> <p>august 17:6 112:19</p> <p>author 118:18</p> <p>authorities 20:12</p> <p>authority 181:22 182:11</p> <p>authorized 6:9</p> <p>available 95:8,24 151:16 167:25 171:16,22</p> <p>avenue 2:10</p> <p>average 180:10</p> <p>avoid 180:22</p> <p>awaiting 132:2 133:9</p> <p>aware 20:11 22:14 55:16 59:23 60:1 63:3 65:8,11 69:12,15 103:6 113:3 115:15,18 115:19,22,25 116:3 118:4 178:10 193:4,13 193:20 199:24 200:16</p> <p>awhile 114:7 126:7</p> <p>azar 1:9</p>
--	--	--	---

[b - bit]

Page 6

b	45:3 70:2 87:11	behavioral 17:1	200:2
b 28:2 152:4	88:8 89:6 99:15	behaviors 46:24	beth 110:19 111:9
207:11	130:15 137:8	46:25 189:16	112:1 123:21,25
bachelor's 16:4,5	139:16 140:20	190:10	123:25 175:14
back 21:4 38:19	153:25 163:17	belief 31:17 49:16	better 18:3,18
40:16,19 54:19	167:13 170:8	50:10 65:6 191:5	44:4 125:8 192:4
56:24 57:4 62:14	190:8,10,15,24	191:21	198:18
70:3 77:11,13	196:14	beliefs 50:7,10	bettis 176:10
78:8 79:7 81:11	basis 92:11 129:16	70:13 74:17 98:4	betts 12:22 30:6,9
92:24 115:8	130:11 139:3,11	98:25 119:13,25	30:18,25 31:25
121:18 126:11	155:18 157:13	185:20 186:22	32:14,17,23 33:14
136:8 148:11	159:3,12	187:1 189:8	33:19 35:5,15
151:25 152:17	bates 10:23 25:15	190:15 191:4,21	41:2,17 51:20
158:4,7,8 159:22	26:16 30:4 31:23	191:22,23 192:7,8	53:4,6 58:2,16,22
164:16 167:3	31:24 34:18 37:17	192:14	59:1 65:25 68:15
169:4 170:5	38:21 40:13,17	believe 15:21	68:16,25 69:6
171:21 178:21,25	47:5 50:5 51:6,19	21:18 25:17 31:18	71:3,10,20,24 72:5
179:7,12 183:11	53:1 57:7 60:4	34:3 36:21 39:11	72:13,15,18,22
202:18	65:18,25 68:12	42:23 50:18 54:10	73:9,12,18 74:3,16
background 15:12	70:6,25 73:5	60:23 78:3 81:17	74:20 75:6,24
25:8 31:12 59:13	77:12 78:10 85:22	96:9 105:2 110:2	78:21 122:13,16
backgrounds	93:1 103:10 111:7	111:7 118:13	124:19 162:25
67:22	122:9,11 128:5,5	121:1 124:6	176:10 178:14
ballentine 86:14	136:22 138:2,5	126:21 128:6	188:9 190:21
86:22,23	144:14 173:6	153:7 162:16	208:3 209:10,18
ballpark 44:13	209:11	163:24 168:18	209:24 210:25
63:9	bearing 32:10	169:15 170:18	beyond 22:12
baptist 54:4 67:18	37:17 40:18	172:6 173:12	56:15 151:23
baptized 35:16	beattie 3:8	176:10 185:13	bidder 145:12
36:7 105:14,23	beautiful 33:16,19	189:8	bidders 145:9
106:13,21,23	becoming 63:1	believed 94:1	big 69:2 123:21
barbara 148:13	65:14 69:10	believers 50:19	biological 198:25
barton 128:7,10	beds 44:1,3	51:1	199:5 200:7
128:17 129:2	began 126:8 187:8	believes 118:24	bisexual 69:21
131:18,25 132:4,7	beginning 6:16	120:7 189:10	70:11,18
133:14 134:8	136:22 138:2	benefitting 155:19	bit 11:15 59:6
140:1,10,23	181:8	157:15	81:11 82:6 99:19
171:11 211:7	begins 85:24 117:5	best 44:15 95:8,24	103:13 160:6
barton's 133:7	behalf 120:1 141:8	99:17 109:8	181:10 182:21
based 18:8 21:17	205:2	187:15,17 196:3	194:3,10
22:3 28:9 29:5		197:17 198:3	

[blank - case]

Page 7

blank 31:5 105:13	124:19 162:23	210:12 211:2,6,20	124:18 126:6
blankets 24:2	171:13 176:9	212:14 213:3,21	128:1 129:4,6,9
board 32:2	178:14 192:20	business 98:10	130:4 140:4,16
body 50:20 126:20	193:8 208:4,25	c	141:24 142:4,22
126:22	209:5,11,19	c 126:17 157:17	143:6,8,13,19
bold 101:14	210:24	174:5 212:24	146:24 147:4
bos 4:2	brief 67:8	calculated 153:22	149:3,21,25 150:5
boss 33:6	briefly 168:15	calendar 126:12	151:13 163:6,14
bottom 27:9 31:7	199:10	call 58:10,12	163:22 167:19
35:3 41:16 53:6	broader 186:21	called 25:14 42:3,8	171:14 182:24
57:20 66:17 67:7	187:9	126:25 148:4	183:21 194:6,13
78:11 97:13	brought 36:8,15	161:6 189:7	194:16,17,20,24
111:25 117:7	36:18,22 79:5	194:17	194:24 195:3,8,9
129:1 137:5 139:7	83:15 121:9	cancellation	195:18 196:20
171:8	brusseau 1:24 5:9	146:16	197:7 198:5,25
box 151:6 191:8	6:8 94:8 206:2,18	candelaria 2:8	199:16 202:24
boyd 2:1 3:20 7:9	budget 129:21	6:22,22 136:2,9	203:16
boys 17:18 42:9,20	131:2,4,8,14	174:1	cared 121:14
43:13 44:18 83:10	155:16 157:12	capacity 1:9,12,14	carf 18:3 126:17
83:15 105:11,22	158:13	1:16,17 3:12,13	caring 121:21
bradley 86:13,15	busha 1:21 3:19	7:4,6	carol 169:14,14
100:14 103:12,16	5:25 7:11,14,18,24	capitals 72:24	carolina 1:1,16,18
210:7,11	11:5,10 12:2,5	87:12	3:6,12,13 6:3 7:5
brandy 1:4 2:6	25:22 30:6,9,14	care 12:21,22	7:7 8:2 17:17,18
7:21 65:10,22	34:19,22 38:5	17:21 20:5,6,6,24	17:21 18:18,22,24
66:1,8,20 67:12	51:8,11,16 57:10	21:7,16,20,25	19:5 20:21 21:7
188:12 190:21	57:12 60:7,10	23:10 24:4,22	35:17 44:22
209:12	63:24 66:5 69:8	30:19,23 37:22	130:20 147:16,19
break 9:4,8,23	71:3,10 81:12	38:16 41:5,19	150:23 151:11
56:20,24 109:17	82:7 85:24 86:2,2	45:15 46:10,14,14	161:17 170:18
114:9,20 160:5	100:11,14 103:11	48:12 54:18 61:4	186:14 196:4
178:19 179:5	103:16 114:10	61:17 62:17 64:21	197:2 206:3,11
breaking 93:13,17	115:10 122:13,17	65:20 66:8 68:2	212:4,10
93:23	123:20 128:8,10	72:5 87:22 89:13	carreras 4:3 5:2
breaks 9:9,18	134:22 136:15,23	91:12 92:8 95:16	6:6
brenda 12:21	156:19,22 159:5	96:3 97:2,14 98:2	carry 113:21
21:22 30:7,9,23	174:10 179:13,23	98:22 101:14,16	case 1:6 5:17 6:4
36:2 48:11 54:4	199:8 204:24	108:5 110:12	7:21 23:16,17
57:10,12 58:14	205:7 207:3,16	114:4 117:18	24:6 183:20,24
60:10 65:25 71:4	208:4,9,20 209:1,6	118:6,9,12 120:16	184:2,5,10,16,18
71:10 122:13,16	209:19 210:2,3,8	120:19 122:3	185:6 204:6 213:2

<p>catholic 29:23 34:9 35:17 36:7 36:10 37:21,25 38:16 48:22 49:8 52:13,22 53:8,16 53:20 54:4,16 57:23 58:18,24 59:15 60:20 61:24 62:25 63:3,5 87:8 87:13,23 95:19 101:19 102:2,4 103:14,25 104:5,9 104:12 107:25 108:2,8 109:1,10 125:18 185:24 186:4,13,16,19 187:11,19 208:16</p> <p>catholics 32:4,20 39:4 47:4 49:2 50:25 59:11,22 62:22 187:9</p> <p>catone 132:19,21 133:18,18,23 134:2,5,12 211:10</p> <p>cause 206:7</p> <p>cc'd 32:25 55:4</p> <p>cc'g 161:16 171:10</p> <p>cc's 54:20</p> <p>ccook 2:17</p> <p>ceo 12:20,21 54:11 137:3</p> <p>certain 22:5,7 105:6 121:1 138:18 176:12</p> <p>certificate 206:1 207:10</p> <p>certified 5:3</p> <p>certify 206:3,6</p> <p>cfr 155:11</p> <p>chain 30:6,8,25 31:8,21 32:12</p>	<p>33:13 34:21 35:22 39:14 40:5,23 51:10,16,19 53:6 53:24 57:9,11 60:6,9,15 71:2,8 71:19 72:22 86:1 86:8,9,12 87:6 92:25 101:4 103:15 111:11 112:7,15 128:9 131:17,24 132:20 132:25 133:17,25 136:14 156:21 157:1 160:13 208:2,7,19,24 209:4,17 210:1,10 210:15 211:5,8,19 212:13,18</p> <p>challenging 46:23</p> <p>chance 86:6 128:13</p> <p>change 39:3 47:3 59:3,9,9,21 62:21 98:4 150:22,24 151:7,9 152:17,18 152:21,22,24 153:5,6,21 154:7 155:24 156:1 184:10 188:3,4 212:10 213:5</p> <p>changed 37:14 38:15,18 107:24 187:6</p> <p>changes 68:7,10 97:25 99:11 125:12</p> <p>changing 97:16</p> <p>charge 124:12</p> <p>charleston 206:11 206:11</p>	<p>chart 138:1,15,20 165:22 166:16</p> <p>check 66:19 140:11 180:16 191:8</p> <p>checked 66:20</p> <p>checklist 123:24</p> <p>chief 146:13,13,14 146:14 161:23</p> <p>child 19:1,25 20:13,16,20 24:10 45:15,15 46:13 66:20 84:11,24,25 85:13,14,15,16 88:20 89:2 96:3,5 96:23,23 97:2,9,22 99:11,17 100:5 102:6,22 103:3 108:16,17,18 112:3,7 113:19,21 113:22 123:24 139:4 145:7 168:17,20 181:22 182:15,18,19,23 183:15,22 184:6 184:19 185:7 197:9,11 198:24 199:1,4,19 200:5 201:20 202:8 204:3,14</p> <p>child's 84:10 96:4 96:15 103:4 104:17 113:8,9,16 198:25 199:20</p> <p>childhood 67:16</p> <p>children 1:11,12 1:15 3:2,3,4 17:16 20:5,12,25 21:9 23:22 24:4 41:6 41:19 43:5,7,9,10 43:23 44:8,16,24</p>	<p>45:6,11,18 46:2,12 66:22 67:1 82:9 82:14 83:1,4,14 84:4,21 85:3,11 87:8,10,21,22,22 88:10,14,17,18 89:4 90:6,8,17,18 90:21 91:5,11 92:22 94:4,15 95:8,17,18,23 97:13,18 98:1,21 99:22 100:6 101:16,19 102:1,2 102:3,14 104:5,9 104:11,12,24,25 105:22 106:12,16 106:17,20,23 107:7 109:18,21 109:22,25 110:11 110:16,22 111:2 113:2,12 114:3 115:16,20 116:1 118:6,14 119:1,9 119:12,22,24 120:4,8,15,18,22 120:23 121:2,10 121:13,20,21 127:5 149:20,24 151:13 153:25 163:8 168:1,9 171:14 181:14 184:17 194:6 198:5,7 199:16</p> <p>children's 17:9,14 17:16 18:1,12 19:9,9,20 29:17 42:4,17 43:1,23 44:9,16 45:19 83:9,14 86:17,20 86:24 90:12 95:3 99:11 102:13,21</p>
--	---	--	--

[children's - completing]

Page 9

103:2 105:4,19 107:7 115:15 118:23 142:3 168:6 choice 43:12 94:15 chose 83:20 christ 27:18,19,25 28:12 47:13 48:20 50:20 51:1 67:10 105:12 106:9 christian 15:15 16:6 37:20,24 67:14 74:11,12,22 75:1,9 76:3 85:14 118:12 119:24 131:11 187:1,21 191:11,21,22 192:8,14 208:14 christians 29:8,20 37:12 39:10,12 49:14 187:10 191:5 christie 3:7 7:1 205:1 christie.newman 3:10 church 31:3,3,4,19 32:4 35:7,19 48:23 50:21 51:2 67:15,17,18,21 74:5,10,12 75:8 76:17,18 77:1 79:15 83:21 85:14 87:12,23,24 88:11 88:15 89:1,3,5 90:6,8,17,18,22 91:6,11,13,16,18 91:25 92:13 104:2 104:14,18 105:13 106:7,9,14,17,18 107:8 113:22	114:4 115:16 116:1 190:25 191:11,14 193:6 193:21 churches 22:7 32:7,19 83:23 102:4 circumstance 97:7 cites 76:4 civil 5:16 154:25 155:10 clarification 8:22 8:24 9:1 129:12 129:23 130:22 131:1 134:6 clarify 96:22 195:2 clarity 189:4 cleanup 179:20 clear 87:14 98:20 148:9 165:7,21 166:6 clearer 190:1 clemson 16:1 client 47:21 80:12 80:21 159:3,11 close 178:22 179:3 181:14 closed 43:18,20 closer 47:7 160:3 closish 160:3 clothes 23:23 24:2 coerced 197:11 coleman 3:15 5:18 7:3,3 14:22,25 15:8 29:9 34:12 50:12 52:15 69:22 70:20 75:14 76:19 77:6 79:22 81:2,8 82:11 90:13,24 92:6 95:20 105:25	108:12 119:14 134:13 135:6,11 135:15,21 144:2 166:4 179:2 180:15,21,25 182:7 183:18 184:14,22 185:1 185:11 186:25 187:5,24 188:7 189:21 190:6,13 190:19 191:18 192:3,12,19 193:7 193:19 194:2 195:12,21 196:2 196:12,18,22 197:6,15,24 198:12,17,23 199:13 201:2,4,8 201:12,17,22 202:2,11 203:10 204:5,19 207:9 coleman's 199:11 collect 175:8 178:7 178:12 collection 161:2 college 16:7,8 colloquialism 181:20 color 139:3 columbia 3:22 163:14 column 138:15,17 139:8,14 140:19 come 23:25 36:1 40:1 56:6,24 154:7 178:21,25 179:7 180:3 comes 49:21,21 85:3 98:23 136:1 comfortable 58:7 58:17,23 67:20	82:15 107:3,17,20 107:22 108:8,15 109:1,12 coming 101:16 180:19 193:5 comment 137:9 140:23 comments 136:11 137:7,8,15 138:3 138:11,17 143:14 211:14 commission 16:22 18:2 126:16 206:19 213:25 commitment 49:15 committed 189:13 189:15 communicate 9:15 46:10 communication 33:22,23 55:1,8 79:21 80:3,25 81:20 communications 55:13 80:17 159:9 159:11 161:2 195:17,23 202:20 communities 22:5 community 18:23 21:17 22:3 compare 158:16 158:17 comparing 125:9 compiled 161:7 complete 19:10 206:5 completed 168:19 completely 195:23 completing 123:22
---	---	---	---

compliance 23:19 154:15,20,24 compliment 33:21 33:25 comply 155:7 computer 11:15 14:14 124:13 con 97:19 concern 141:3,7 concerns 121:9 137:11 concierge 4:2 concluded 205:10 concludes 205:6 condition 10:14 conditions 155:5 157:10 158:10 conduct 189:13 197:12 199:2 conducted 74:16 conference 9:14 conferencing 9:16 confirmation 172:7 confirmed 35:16 163:15 167:11 confirming 106:11 confused 112:4 confusing 40:20 confusion 166:23 166:23 connection 9:22 consent 84:15,16 88:19 consents 84:10 consider 39:16 137:20 141:12,17 consideration 61:5 62:18 considered 39:22 74:12	considers 90:5 consistent 97:19 151:18 186:15 contact 45:14 79:20,21 81:17 87:15 99:15 168:17 193:9 contacted 80:1 81:13 82:2,4 195:14 contacting 21:19 80:6 81:16 contain 138:17 contemplated 162:12 170:1 context 47:18 48:10 103:14 142:15 189:14 continued 185:5 continues 138:23 contract 87:17 89:2,6,8,10,12,18 91:21,22 92:1,14 92:15,18,21,23 130:1,24 142:1,4,6 142:8,10,12,16,21 143:6,20,25 147:9 147:16,18,25 148:4,18,19,22 149:2,6,17,18 150:4,10,14 151:8 151:11,18,22,22 152:1,7 153:4,11 153:14,21 154:6 154:14,20 155:2 156:5,13 157:6,22 158:2,4,5,8,17 159:1 165:18 202:13,19 203:2,5 203:8,16,21,22 204:11,15 212:3	contracting 143:2 149:15 contractor 155:4,6 contracts 143:4 203:15 contractual 143:23 convenience 162:3 conversation 46:13 48:11 68:16 78:25 139:25 140:1 conversations 79:2 80:14 81:3,7 108:4 conversely 196:8 convert 201:20 202:8 conveyed 87:9 169:1,1,4 coo 19:22 33:8 124:5 cook 2:14 6:20,20 cooperating 174:17 copied 160:25 161:14 169:19 170:22 copy 73:21,21 116:16,21 123:10 173:11 175:2 177:8 core 67:23 correct 16:12 20:17,18 29:4,5 30:1 33:9 52:24 54:12 63:8 64:19 65:16 68:9 69:15 80:24 98:3 112:20 128:18 130:6,13 133:15 141:25	142:24,24 143:21 147:6 148:16 152:14 159:20 165:19 168:23 169:2 172:14 175:19 181:24 183:2,16 184:20 184:24 185:9 186:12 187:22,25 188:1,5 191:6,16 192:10,17,23 193:11 194:19 195:4 196:6,7,10 196:16,24 197:4,8 197:14,16,22 198:10,15,21 199:6 200:18 202:10 204:18 correctly 33:1 88:10,12,24 89:23 112:9 cottage 88:15 90:18 counsel 2:3,4 5:25 6:12 79:3,4 80:14 80:18,20 81:4 131:20 133:19 159:9 176:22 177:13,25 193:10 206:7 counseling 15:16 16:1 counselors 5:2 countersigned 204:16 counties 24:18 county 18:23 24:17 206:11 couple 8:8 9:13 39:9 40:4 66:12 66:13 67:20 69:13
---	--	--	--

<p>69:17,17 77:23 78:13,24 79:14,15 99:9 105:8,9 109:14 144:6,6 147:12 171:18 188:16,21 couples 69:9 70:19 125:23 course 13:23 19:8 19:23 20:10 22:22 41:14 43:11 46:12 55:22 96:13,19 97:1,6 170:13 court 1:1 6:3,7 7:12 8:12 94:12 144:9,12 173:20 173:23 174:3 180:16,19,23 200:25 201:24 courtroom 5:14 covenant 78:2,5 covenants 155:4 157:9 158:9 cover 149:23 174:12 covered 64:18 124:24 covering 153:6,8 covid 5:5 cpa 18:25 19:5 95:16 97:3 141:23 149:9 154:2 157:6 181:9,14 182:10 182:12,19 183:3,5 183:7,10 184:16 185:4 194:21,24 195:8,17 196:6 197:2,10 198:6 202:24 203:9,17 203:24</p>	<p>cpa's 141:4 cpas 21:7 127:8,12 127:12 129:25 130:18,24 139:16 140:20 142:21 143:2,18 149:20 151:12 163:18 167:14 181:9,21 182:3,3,4,25 196:14,15 202:15 cravath 2:7 6:18 6:23 7:19 cravath.com 2:11 2:12 criminal 25:8 criteria 25:1,5,6 27:11 191:15 current 7:25 31:2 149:19 161:17 currey 2:14 6:20 cv 1:6 6:4</p> <hr/> <p style="text-align: center;">d</p> <hr/> <p>d 2:7 207:1 daily 100:6 116:2 darren 4:3 5:2 6:6 dash 105:17,18,18 databases 14:13 date 1:22 37:13 38:17 146:18 149:11 150:14 151:9,10,22 172:7 213:3 dated 11:3,10 12:3 30:7,8 34:20,21 38:10,23 51:9,10 57:10,11 60:7,9 65:24 71:2,11 73:8,13 86:1 100:12,13 101:2 103:12,15 111:10 111:11 122:14,15</p>	<p>128:8,9 132:19,20 136:14 144:16 156:19,21 163:12 173:8 174:4 207:13 208:2,7,19 208:24 209:4,9,17 209:23 210:1,6,10 210:15,23 211:5,8 211:19 212:13,22 dawn 128:7,10,17 133:7,13 134:8 140:1 171:10 211:7 day 13:1 23:24 58:11 89:24 100:23 101:3,7 204:4,14 206:10 213:22 days 131:25 december 57:10 122:14 decide 183:14 decision 44:23 76:10 93:13 95:7 105:12 144:15,18 211:25 decisions 98:10 170:8 decline 97:1 declined 96:3 declining 198:7 defendants 1:19 3:1,11 5:20 7:2 205:2 defense 2:13 defined 119:3 130:19 200:16 definitely 32:19 160:3 definition 129:18</p>	<p>definitions 174:19 degree 15:18 16:4 16:5,7 degrees 15:23 delay 174:1 delighted 54:1 demonstrating 201:9 denied 72:4 denomination 31:18 35:7 denominations 39:17,19 deny 139:1 denying 76:4 department 1:7,9 1:18 3:13 6:1 7:7 18:18 20:23,25 23:20 25:7 43:2 44:22 89:10 124:7 130:20 147:16,19 212:5 departure 17:3 depending 198:19 depicts 138:20 deponent 2:1 3:19 deposition 1:21 5:8,24 6:5 8:3 9:4 9:12 10:23 11:5,9 12:2,6,12 13:20,23 14:13,20,23 71:16 160:23 181:6 207:16 213:3 depositions 191:20 192:6 dept 213:2 deputy 1:14 derived 48:2 derrick 148:13 describe 17:11 19:15 20:19 50:9</p>
---	--	---	---

<p>125:3 described 40:5 136:21 description 53:11 151:7,17 152:18 design 77:25 78:3 designed 101:15 designing 123:23 despite 31:18 detail 54:1 determinative 75:13 76:9 determine 27:11 99:17 determined 74:20 75:17,25 develop 61:9 developing 127:25 development 18:6 developmental 124:7 devotion 82:20 83:25 100:3 devotional 82:18 83:3,8 99:25 devotionals 82:14 devotions 82:19 99:10,18 100:6 115:17 116:2 diapers 23:23 difference 52:21 52:22 59:17 differences 97:17 98:1,21 different 18:11,20 28:16 64:7,8 98:8 98:14 102:22 103:3 107:8 185:4 189:12 191:21,22 192:7,14 194:20 194:22,23 195:7</p>	<p>differently 99:3 187:20 188:1,2 difficult 34:2,4 46:16 difficulty 170:10 diocese 186:14 direct 9:1 17:23 19:21 33:6 directed 61:16 directing 80:21 direction 187:13 directly 59:24 110:4,5 director 1:18 3:13 7:6 12:21 21:16 21:20,25 30:23 46:10 48:12 55:2 55:13 79:21 86:16 128:21 161:17 176:11,13 178:17 directors 17:24 46:9 disability 129:16 139:11 disagree 192:9 disagreed 59:20 59:23,25 60:2 disclosing 40:21 88:4 discomfort 108:2 discovered 88:17 discriminate 101:16 102:14 129:14 130:9 139:9 discrimination 155:18 157:13 163:17 167:13 discuss 133:24 discussed 35:24 36:4,13 50:2,2</p>	<p>75:23 81:23 84:1 112:15 140:7 159:18 163:3 164:3 181:8 discussing 58:7 100:24 101:9 104:4,9 112:22 151:19 164:24 167:8 discussion 36:24 37:2 61:9 76:7,12 78:21 136:12 141:22 172:12 179:22 211:16 discussions 121:12 121:16 dispute 47:12 48:19,22 191:23 192:15 disqualified 69:5 disrupt 97:15 184:10,18 185:6 disruption 101:12 distancing 5:6 distinction 190:8 190:15 distinctions 191:3 district 1:1,1 3:6 6:3,3 disturbing 32:15 dive 8:7 diverse 67:22 division 1:2 doctorate 15:15 doctrinal 25:9,10 25:14,19 26:1,10 27:16 36:2 49:9 49:15,19 50:3,6,15 50:18 51:25 54:7 55:20 56:10 60:21 63:7 64:25 65:5</p>	<p>69:18 70:2,4,7,8 74:6 75:5,22 77:2 77:17,21,25 117:15 118:1,11 131:12 185:15,25 186:7,15,20,21 189:8 190:5 207:19 210:22 doctrine 32:6 74:11,22 75:1,9 76:3 78:6 189:9 190:16 191:4,5 document 25:12 25:14,22 26:4,15 27:1 30:3,4,13 34:17 35:1 37:17 37:19,23 38:7 40:12,17 41:1,8,15 47:5 48:25 49:9 50:4 51:5 53:1 57:16,19 58:5 60:18 62:15 65:3 65:18 66:4 68:21 68:22,24,25 70:5 71:12,19 73:14,16 73:19 77:11 93:9 100:19 103:8 111:5 116:8 118:18,20 122:9 122:11 125:2 128:15,16 129:1,4 129:6,18 130:4,17 130:19 133:6 134:25 135:8 136:10 137:10,24 138:8 139:18 140:4,9,12,21 144:15,17,22,25 146:12 148:6,11 148:18 149:14 150:8,11,12,22</p>
---	--	---	---

[document - either]

Page 13

151:3,6 156:16	127:10,20,23,25	51:7,10,16,20 53:6	176:20,21 177:1,8
160:11,19 163:11	128:7,17 130:1,17	53:24 55:4,17	177:18 188:9,13
163:25 164:22	130:22,25 132:14	56:15 57:7,9,11	190:20,22 207:1
165:22 170:1	133:19 134:12	60:4,6,9,14,17	207:11 208:2,7,19
171:20 173:3	137:19 138:16	61:9,14 62:5,14	208:24 209:4,9,17
174:22,23,24,25	141:7,12,17,23	65:24 71:2,8,9,18	209:23 210:1,6,10
175:3 185:14	142:5,9,20,21,25	72:21,22 73:8,12	210:15,23 211:5,8
188:19 200:9	143:3,7,15,18,20	75:4,24 76:6	211:19 212:13,18
204:16 208:12	143:22 146:13,16	81:20 85:23 86:1	212:24
211:13,24	146:21 147:8,9	86:8,9,12 87:4	earlier 30:17
documentation	148:14,25 149:3	88:23 89:24 90:9	39:25 48:25 49:10
72:8	149:10,16 150:12	91:23 92:11,24	64:18 99:20 118:3
documents 13:22	151:11 153:4	93:2,3 94:20	147:7,25 158:14
14:1,5,8,16 40:19	154:8,10 156:6,13	97:24 98:20 99:10	164:4 172:17
125:10 142:17	157:5 159:22	100:11,13,22	179:22 181:7,12
144:6 173:8 175:8	160:12,13 161:7	101:1,4,6 103:11	183:19 185:12
175:23 176:5,18	161:17 163:9,14	103:15,21,24	188:8 189:22
176:21 177:1,6,8	163:14,15 167:9	106:8,12 108:7,14	194:3,11 199:15
177:14,15,17,18	167:10,11,16,19	111:9,11,21 112:1	200:9 202:12
178:7,12,16	168:4,8,17 169:1,4	112:7,12,15	earliest 162:3
182:10 195:7	169:8 172:12,24	122:12,15,22	early 38:14 139:6
199:14 202:13,20	182:1,9,11,17,18	123:15,20 128:4,7	181:16
doing 9:11 33:16	182:18,23,25	128:9,21,24	eden 1:3 2:6 7:20
dollar 204:14	183:7,11,12,14	130:15 131:17,24	65:9 66:15 75:4
dollars 152:14,25	185:4 195:14,17	132:1,5,18,20,25	188:12 190:21
153:5 204:3	196:4 203:15	133:2,3,24 134:1,7	edits 124:14
donations 24:1	204:3 212:19	134:21 135:1,4,12	education 2:13
door 49:2	dss's 140:15	136:1,3,14,20,21	15:12,14,25 16:6
dormant 126:7	164:25 183:6	136:24 137:17	20:10 127:10
downloaded	due 5:5 87:15	138:12 139:23,25	effect 196:19
116:17	170:8	140:12 141:10	effort 22:13
draft 72:18 73:21	duerk 12:20	156:18,21 157:1,4	149:23
165:16 166:12	duties 21:15 55:9	157:22,25 158:18	efforts 163:8
draw 190:14	170:13	158:25 159:18	175:7
draws 190:8	e	160:13 161:14,15	eighth 2:10
drug 18:17,19	e 3:15 9:19 30:6,8	162:12 166:11	either 13:15 47:24
dss 17:20 24:18,20	30:25 31:8,21,25	167:23 168:2	153:20 155:25
45:14 46:12,21	32:12,13,24 34:19	169:12,20 170:1,5	159:22 185:5
54:2 89:13,18	34:21 35:4,14,22	170:22 171:9	189:5 192:21
91:22 95:7,16,23	38:20 39:14 40:5	174:6 175:13,23	199:16 202:24
97:2 115:24	40:23 41:3,16,17	175:23 176:4,13	

<p>electronic 14:13 177:17</p> <p>electronically 177:19</p> <p>eligibility 138:25</p> <p>else's 112:11</p> <p>embrace 49:15</p> <p>embraces 67:22</p> <p>emergency 142:6 142:8,10,12 147:9 147:15,18,25 148:4 149:16,18 150:10 151:8,10 151:18,21,22 152:1,6 153:4,8,10 153:14,21 154:6 154:14,20 155:2 156:5,13 157:6,22 158:1,3,5,8 159:1 203:1,21 204:10 212:3</p> <p>emily 161:16,20 162:2,23</p> <p>emphasize 101:15</p> <p>employed 16:10 16:20 17:5 18:14 19:5 28:5 112:16</p> <p>employee 18:16 27:12 28:10 54:3</p> <p>employees 59:20</p> <p>employment 15:13 49:17 94:15 157:13</p> <p>enable 151:11</p> <p>enabling 151:14</p> <p>encourage 106:20 106:22 112:25 113:25 119:17</p> <p>encouraged 91:13 91:18 119:11</p>	<p>encouragement 82:22,24,25</p> <p>encourages 114:3</p> <p>encouraging 84:11 113:3 118:4</p> <p>ended 56:14</p> <p>ends 77:12 139:24 141:11</p> <p>enforced 153:12</p> <p>engage 197:12 199:2</p> <p>engaging 60:19 189:13,16</p> <p>ensure 20:7,7 59:14 124:23</p> <p>ensuring 18:7</p> <p>entailed 19:17</p> <p>entered 89:18 148:6,20,22,22</p> <p>enters 89:13</p> <p>entire 22:1</p> <p>entirely 165:21 166:24</p> <p>entirety 21:24</p> <p>entitled 37:23 136:10 144:17 160:13 208:12 211:13,24 212:19</p> <p>entity 44:23</p> <p>entries 171:19</p> <p>entry 163:11 169:12 170:3 171:19</p> <p>environment 67:4</p> <p>equally 59:15,16</p> <p>equipped 46:24</p> <p>errata 213:1</p> <p>error 123:5,7</p> <p>essentially 142:20</p> <p>establish 164:20</p>	<p>established 62:1 80:13</p> <p>et 213:2,2</p> <p>evangelical 50:10 113:1 118:12 119:24 185:19</p> <p>evangelize 202:8</p> <p>evangelizing 201:14</p> <p>events 14:3,7 161:3 172:24 206:8</p> <p>evidence 18:8</p> <p>exact 44:6 124:3 175:2 181:16</p> <p>exactly 83:3 84:7 84:7 119:7 143:15 176:16</p> <p>examination 7:16 179:17 180:24 207:4,6,8</p> <p>example 28:25 50:16 77:1 85:7 88:1</p> <p>examples 199:15</p> <p>excellence 20:14</p> <p>exchange 133:12</p> <p>excited 54:17</p> <p>exclamation 72:23</p> <p>excuse 11:13 147:8</p> <p>executive 196:14</p> <p>exempts 157:16</p> <p>exercise 194:5</p> <p>exhausted 16:19</p> <p>exhibit 10:21 11:3 11:9 12:1 25:17 25:18 26:14,18 30:3,8 34:17,21 37:18,23 38:20 39:15 40:6,7,13,16</p>	<p>47:2 49:11 50:4 51:7,10 57:9,11 60:6,9 61:10 65:20,24 68:12,17 70:5,25 71:2 73:5 73:7,8 77:11 78:8 85:22 86:1 91:23 92:25 97:11 100:9 100:13,23 101:2,3 101:4 103:9,15 111:6,11 116:4 117:12,14 118:10 122:10,15 128:6,9 132:17,20 133:8 134:19 135:8,14 135:15,20 136:4,6 136:10,14,19 137:25 138:1 139:24 140:8,10 141:11 144:8,13 144:17 147:14,18 150:20,23 152:1 152:17 154:14 155:25 156:17,21 158:7,18 159:23 160:11,13 164:23 165:25 166:17 167:10 173:21 174:4 190:22 207:13,18,22 208:2,7,12,19,24 209:4,9,15,17,23 210:1,6,10,15,20 210:23 211:5,8,13 211:19,24 212:3,9 212:13,18,22</p> <p>exhibits 140:8</p> <p>exist 158:3</p> <p>exited 165:11</p> <p>experience 46:15 82:7 112:25</p>
--	---	--	--

[experience - first]

Page 15

<p>134:10 experiences 67:18 expert 39:18 expires 206:19 213:25 explain 31:5 58:14 58:15,21 118:16 203:14 explained 148:3 explore 181:11 expose 113:18 119:23 exposed 96:15,24 199:1 express 113:17 expressed 108:1 extend 151:8 extended 151:23 extends 151:9 extensively 126:8 extent 47:21,22 48:2 80:11,16,19 108:7 114:17 123:9 125:3 159:4 159:10</p>	<p>146:21 147:24 171:19 176:19,25 190:24 fair 28:6 38:13 50:9 87:24 112:21 faith 27:16 28:16 28:21 34:9 60:20 67:9 74:18,21,25 75:12 76:1,9 87:8 87:13 89:3,3 95:19 98:8,14,17 99:1,16 102:4 105:12 106:9 110:23 111:3 113:9,14,18 139:16 140:20 163:17 167:13 195:16 196:14 faiths 97:14 fall 24:19 familiar 19:24 20:13 24:13 35:1 47:13,16 116:12 191:3 familiarity 112:14 families 1:11,13 1:15 3:2,4,5 21:12 22:13,17,23 23:3,7 23:12,19,25 24:3 25:9 32:3 46:24 57:22 58:8,17,24 63:10,11,25 64:2,5 64:6,15 69:5 90:23 97:18 111:2 112:23,25 113:6,6 113:11 114:1,3 115:15 120:3,25 125:18 154:1 168:10,21 171:15 179:24 180:1,2,4,7 184:17 199:4</p>	<p>family 23:17,18,21 24:5,9 45:20,22,23 46:4 63:3,5 67:3 72:10 84:10,16,18 84:23 85:2,9 91:7 96:4,14,22 99:15 100:5 102:23 103:4 107:9 113:8 113:17,18 122:25 123:17,22 124:12 124:17 125:5 127:5 129:15 130:10 139:11 149:25 167:25 183:5,7,10,12,21 184:3,23 185:3 186:5,11 198:25 199:5,17 200:7 family's 113:20 120:11 184:7 faq's 26:16,19 27:3 207:24 far 33:12 59:15 172:2 farther 112:7 155:15 174:16 federal 5:16,20 7:2 154:10,15,21 155:7,20 157:15 205:2 fee 204:2 feedback 71:22,25 72:6,14,18,20 164:1 feel 58:6,16,23 67:20 83:1 189:24 feels 67:2 felt 33:24 54:5 59:7,8 fendley 134:21 136:15 137:2</p>	<p>138:11 166:9,10 211:21 fendley's 141:10 file 14:9 filed 6:2 47:10,14 48:18 188:11 fill 151:14 filled 44:4 final 73:24 147:1,3 182:11 finalized 73:21 financial 155:20 157:15 financially 6:11 find 41:8 46:16 71:20 95:16 97:2 102:11,17,19,22 103:3 109:24 123:10 166:3 168:8 finds 183:10 fine 13:2 15:22,23 115:1 135:23 finish 109:15 126:10 finished 8:13,16 178:21,22 firm 6:6,8 7:19 first 7:15 8:10 10:20 27:10 30:16 36:3 38:10 41:16 48:25 53:5 54:2 54:24 58:4 60:18 71:18 72:21 74:3 75:3 86:11 97:12 97:12 101:24 118:10 134:24 135:2 137:6,25 143:7 148:17,17 149:2,5 153:13 161:13,13 170:1</p>
<p>f</p>			
<p>f 126:17 129:12 138:24 face 15:2,2 facilitate 151:12 facilitates 182:19 facilities 16:23 18:3 126:17 149:25 162:3,7 163:7 facility 100:1 fact 25:25 34:7 49:13 56:2 62:24 66:7 72:17 81:13 94:3 104:3,8 120:18 140:8</p>			

[first - front]

Page 16

203:5,8 fit 168:25 five 50:17 flesh 181:10 flip 40:18 57:18 128:25 134:24 138:22 floor 2:1,16 3:16 3:21 flow 125:8 focused 18:6 150:6 folder 135:20 folks 13:7,19 98:23 134:12 179:1 follow 62:25 98:25 115:11 133:13 188:16 followed 56:8 131:24 followers 27:17,25 28:12 47:12 48:20 following 5:6,15 follows 7:15 157:11 followup 103:13 force 89:6 forcing 89:2 foregoing 206:4 forge 160:5,7 form 28:1 29:10 34:13 50:13,20 51:2,2 52:16 63:20 65:20 66:8 68:2,7,10 69:22 70:20 75:14,21 76:20,25 82:12 89:15 90:14,25 92:2,7 94:6 95:21 96:17 99:5 105:25 108:12 117:19	118:10 119:15 134:14 144:3 164:8 165:4 168:18 182:6 183:17 184:13,21 184:25 185:10 186:23 187:4,23 188:6 189:6,19 190:3,12,18 191:17,25 192:11 192:18 193:2,12 193:18 194:1 195:11,20 196:1 196:11,17,21 197:5,13,23 198:9 198:16,22 199:7 200:24 201:3,7,10 201:16,21 203:7 203:25 204:17 formal 104:23,24 204:16 former 12:21 175:14,15 forth 40:19 forward 35:22 37:6 53:23,24 54:22 55:10 56:2 73:18 169:22 forwarded 32:24 33:4,14 53:10,17 53:19 54:8,13 55:18 73:20 85:25 133:11,17 192:22 forwards 53:7 foster 12:21,22 17:21 18:7 20:6 20:24,25 21:7,10 21:12,16,19,20,25 22:13,17,18,23,25 23:2,7,10,12,24,24 23:25 24:9,22	25:2 26:9 27:12 27:24 28:11,17,21 29:1,7,19,24 30:19 30:23 32:3 36:1 37:10,21,22,25,25 38:15,16 39:4,10 41:6,20 44:24 45:20 46:3,10,14 46:16,17,22,23,24 47:4 48:12 49:2,3 49:7 51:24 52:4,9 53:21 54:18 55:14 57:22 58:8,17,24 59:11,22 61:4,17 62:17,22,24 63:10 64:1,6,11,15,21 65:14,20 66:8,18 68:2 69:10 70:11 70:22 72:4,10 75:23 76:11 89:13 92:8 98:7,13,24 101:14 107:3,16 108:1,5,9,22 109:2 109:4 110:4,12 112:23 113:2,3,6,6 113:7,11,16,18 114:1,3,4 117:18 117:24 118:5,6,9 118:12,13,24 119:10,21 120:5,7 120:24 121:25 122:3,25 123:17 123:22,23,23 124:12,17,18,23 125:5,13,18 126:6 128:1 129:4,6,9,15 130:4,10 131:10 139:2,10 140:4,16 140:16 141:24 142:4,22 143:6,7 143:13,19 146:24	147:4 149:3,21,25 150:5 151:13 154:1 163:6,13,22 167:19 168:1,9,9 168:21 171:14 181:14,22 182:4 182:24 183:21 184:3,6 185:3,5,24 186:5,5 188:25 189:5 194:6,13,16 194:17,20,24 195:8,8,16,18 196:20 197:7,9,10 197:11 198:5,5,24 199:16 200:11 201:18 202:6 208:15,16 fostering 49:17 54:3 69:14 110:3 110:6,7 found 145:7 177:13,24 178:1,3 four 17:15,24 50:17 52:5 90:2 205:8 fourth 47:9 93:5 fp 137:7 freddie 1:21 3:19 5:25 7:14,24 205:7 207:3 213:3 213:21 free 61:4 62:17 80:18 81:4 92:4 159:10 freedom 131:6 139:17 140:21 141:4 freedoms 129:22 frequently 27:4 front 38:4 78:10 150:16 160:17
---	--	---	---

[full - hands]

Page 17

<p>full 7:22 142:9,14 142:16,18 149:14 151:15</p> <p>fund 2:13</p> <p>funds 152:13,25 153:18 154:5,10</p> <p>funny 116:19</p> <p>furnell 54:21,25 55:5,6,7,12 71:4,9 79:20 80:1,6,8,22 81:1,1,8,13,17,18 81:24 193:9 209:20</p> <p>further 92:25 179:15 204:23 206:6</p> <p>furthermore 129:13 139:9</p> <p>future 31:14</p> <p>fyi 35:23</p>	<p>georgia 35:17</p> <p>getting 135:19 160:3 179:3</p> <p>give 8:23 44:14 67:8 85:7 178:20 204:19</p> <p>given 43:24 56:5,6 64:7,16 180:1,5 198:18 205:7</p> <p>gives 169:23</p> <p>giving 72:20 164:1</p> <p>glad 35:10</p> <p>go 8:8 15:11 22:17 22:24 38:19 77:13 79:7 83:21 85:15 85:20 88:25 90:18 90:22 91:6,24 92:13 107:1,21 108:17 114:19 117:22 121:18 129:20 133:5 136:7 149:13 152:2,16,16 158:4 158:8 174:16,17 178:24</p> <p>goal 45:18 59:14 119:23</p> <p>god 31:17 54:21</p> <p>god's 77:25 78:3</p> <p>goes 31:16 74:9 139:4 170:7</p> <p>going 5:22 8:6 9:9 11:8 26:14 30:3 32:12 34:16 47:20 51:7 53:13 56:18 57:1,8 60:5 65:19 68:12 70:25 73:5 73:6 85:13,14,22 94:22 103:9,11 107:12,14 111:6 112:5 114:6 115:5</p>	<p>116:7,9,20 117:11 118:2 120:5 121:17 122:10 128:6 132:17 135:1,22 136:19 144:7,13 147:14 150:19 159:2,6 160:1,10 165:3 173:5 174:13,20 179:3,9 181:9,10 188:16</p> <p>good 5:1 7:18 27:19 46:11 54:5 56:19 61:3 66:21 94:9 114:8 123:21 166:20 168:25 180:20 194:10 197:19</p> <p>gospel 49:15</p> <p>government 126:19 154:11</p> <p>governor 1:16 3:12 7:4 196:13</p> <p>governs 150:4</p> <p>granted 196:4</p> <p>great 10:3,18,25 18:10 26:24 53:23 87:4 110:3,6,7 115:2,3 123:13 150:18 160:8</p> <p>greatly 71:22</p> <p>greenville 1:2 2:2 3:9,17 6:4 17:18 22:6 169:23 193:21</p> <p>greet 170:17</p> <p>ground 8:8</p> <p>group 13:4,7 31:15 41:5,19,24 42:5 45:6,11 46:3 46:14 72:1,6,14</p>	<p>82:10,13 84:5,21 85:4 94:4 96:3,4 96:24 105:1 106:20 109:19,25 110:17 112:22 115:15,21 116:1 120:15,20 121:4,6 121:11 128:2 149:19,20 187:9 194:17,17 195:24 196:9 202:15</p> <p>groups 22:7 193:14</p> <p>grown 67:19</p> <p>guess 109:8 122:10 146:14</p> <p>guidance 16:1 79:17</p> <p>guide 27:17</p> <p>guys 114:23 116:19</p>
g			h
<p>gathering 182:10</p> <p>gay 69:21 70:10 70:18</p> <p>gears 82:5</p> <p>gender 129:16,17 139:11,12 189:15</p> <p>general 44:7,12 121:9,9 131:20 133:18</p> <p>generally 17:11 19:16 20:20 21:6 46:6 101:8 121:21 125:4 142:22 143:1 149:13 150:4 163:2 164:23 165:1 176:7</p> <p>generating 193:16</p> <p>genesis 117:5</p>			<p>h 207:11</p> <p>half 15:6 44:12,16</p> <p>halfway 66:13 114:16 133:6,7 152:3</p> <p>hall 165:5</p> <p>hamilton 86:15 87:1,2</p> <p>hand 125:20 138:14,17 139:8 139:14 140:19 206:9</p> <p>handbook 121:25 122:3 123:1,17,23 124:12,17,24 125:5,20 126:1,1,3</p> <p>handful 181:2</p> <p>hands 166:10</p>

[happen - hill's]

Page 18

happen 40:22	hill 3:19 7:9 12:16	93:14,18,24 94:16	175:17 176:3
happened 89:24	12:18 13:8 15:9	95:18 96:2,14,24	178:8,11,11
96:9,10,11 172:4	16:11,14,15 17:4,5	97:1,6,14,20,25	179:24 183:20,25
happening 56:14	17:8,16,17,22	98:4,7,12,15,20,22	184:15 186:6
90:11	18:11,15 19:4,8,19	98:24 99:1,11	187:6,12 188:20
happy 8:23 9:5	19:21,24 20:16	100:4,10,15	188:24 189:17,23
60:24 62:6 164:14	21:2,8,11,14,24	101:12 102:13,20	190:8,14 191:8
hard 177:8,14,15	22:6,11,15,16,22	102:21 103:1,2,7	193:13,15,23
haynsworth 2:1	23:6,11 24:22	103:10,17 104:16	194:21 195:1,2,6
3:20 7:9	25:1,8,15,18,19	104:19,22 106:3	195:14 196:4
head 8:11 11:14	26:5,8,15,16,18,19	106:14,19 107:6	197:10 198:6
header 166:16	27:5,23 28:3,10,10	107:24 108:24,25	199:18,25 200:3
health 1:7,10 3:1	28:15,20,25 29:6	109:20,24 110:4	203:5,15,24 204:3
6:2 7:7 17:1 18:23	29:16,18,23 30:5	111:8,13 112:16	207:18,21,22,25
196:25 213:2	30:10,20 33:8	112:24,24 113:6	208:5,10,13,17,22
healthcare 20:9	34:18,23 37:9,14	113:25 114:2	209:2,7,13,16,21
hear 9:22 11:19	37:18,20,24 38:1	115:14,20 117:12	209:25 210:4,9,13
133:1 172:10,11	38:15 39:8 40:2	117:14 118:4,19	210:18,20 211:3
172:14 173:21	41:23 42:4,9,16,17	118:23,24 119:11	211:11,17,22
180:17	42:19,25,25 43:21	120:6,7,25 121:24	212:1,6,7,11,16,20
heard 47:17,19,24	43:23 44:5,9 45:4	122:2,12,18 124:2	212:23
48:10 119:2	45:5,10 46:1,7	126:15,24 127:15	hill's 18:1 20:23
hearing 163:14,23	47:3,11,25 48:4,19	127:25 128:5	25:25 39:3 45:19
167:19	49:1,3 51:6,12	129:11 132:18,22	49:9 50:3,6 55:15
held 6:5 23:23	52:8,9 54:3,11	133:21 134:10,20	63:7 64:25 65:21
help 8:9 14:2 61:3	55:2 56:2 57:8,13	136:12,16,21	68:1 69:18 75:5,7
62:17 66:20,23	59:2,10,20,21 60:5	138:1 141:23	75:12,22 76:7
83:1 178:6,17	60:11 61:21 62:21	142:1,3 144:14,18	77:2,24 84:4
helpful 76:23	62:23 63:2,11,18	145:2 146:19,25	85:11 87:21 90:20
136:4 158:5	64:2,6,12,15,19	147:8,15,17,20,21	91:4,21 94:3 96:5
helping 163:9	65:12,18 66:1,9	149:3,9,12,15	96:15,25 98:2,9
168:8 176:17	68:13,18 69:9,12	150:21,24 156:4,8	102:24 103:5
henry 1:16 3:11	69:16,20 70:10,13	156:18,23 157:7	105:23 106:4
7:3	70:13,17 71:1,5	157:11 159:5	109:19 110:17
hereunto 206:9	72:4 73:6,9 74:15	160:10,14 161:24	112:22 115:25
hhs 3:2 197:1	74:16 75:25 76:10	162:1,5,8,10,21	116:10 117:23
hicks 86:14,19	76:15 77:5,15	163:8 167:25	119:12 120:15
94:25	78:5,22 82:8,8	168:7,22,24 170:9	121:4,6,10 125:16
high 134:12	83:7,9,14 84:9,20	170:14 171:4	125:22 131:9,12
highest 15:13	85:1,8,23 86:3,16	172:23 173:7	140:23 141:2,8
	89:12,18 90:4,5,12	174:5,15,18 175:7	145:5 146:16

150:5 153:3 168:9 185:14 186:7,21 189:9 194:4,13 195:15,24 196:6 197:20 198:4 199:3,16 200:10 history 15:13 hold 15:24 18:10 41:7 111:16 135:19 166:1 173:15 188:17 holland 86:13,15 93:2,22 94:1 95:5 95:12 97:11 100:12,14 101:7 103:12,16 105:9 106:8,24 210:7,11 holland's 94:17 103:23 holy 50:19 home 17:16 41:24 42:3,4,17 43:1,5 43:24 44:9,16 46:23,23 83:9,15 85:12 86:17,21,24 90:12 95:3 96:24 99:11 100:1,2 102:13,15,21 103:2 104:1,13 105:1,4 107:7 119:9 120:5 168:24 169:9 181:22 182:10,13 183:22 184:7 195:24 197:10 198:5 199:17 homes 17:18 21:10 41:6,20 42:5,10,22 43:16 44:24 45:6 45:11,19 46:3,11 66:22 67:15 82:10	82:13 83:11,15 84:5,21 85:4 90:22 91:6 94:4 96:3,4 106:20 109:19 110:1,17 112:22 115:15,21 116:1 118:15 119:1,22 120:9,15 120:20 121:4,6,11 128:2 149:19,20 149:21 168:20 182:4,12 194:17 198:1 202:15 honest 176:23 honestly 165:21 178:2 honor 85:2 199:4 199:25 honored 85:5,8 hope 201:5 hopefully 178:21 hopes 193:15,23 hosted 193:22 hour 56:19 160:2 hours 13:13 house 43:5,7,10 83:10 88:13,13 90:16,16 95:4 105:13 106:9,14 106:17 113:13 200:6 housekeeping 11:2 how's 117:2 hrvp 124:5,8 hsblawfirm.com 3:23 hum 16:3 135:17 152:24 169:19 human 1:8,10 3:1 6:2 7:7 124:9 213:2	humility 201:9 hurtful 34:10 husband 35:16 54:4 i idea 114:12 ideas 110:3,6,8 identification 11:6 25:20 26:20 30:11 34:24 38:2 51:13 57:14 60:12 66:2 68:19 71:6 73:10 86:4 100:16 103:18 111:14 117:16 122:19 128:11 132:23 136:13,17 144:19 147:22 150:25 156:24 160:15 174:7 identified 61:23 120:19 188:25 identifies 66:14 identify 70:14 120:16,24 121:3 189:7 identifying 94:9 94:10 identities 40:22 88:5 identity 26:16,19 27:6 32:5 37:21 37:24 55:22 129:17 139:12 190:9 207:23 208:14 immediately 151:12 impact 139:16 140:20 196:19	important 67:23 119:20 158:24 impression 47:11 48:18 incident 99:14 121:7 incidents 121:15 include 9:17 35:7 78:22 82:21 158:24 included 14:8 17:15 78:16 80:14 80:20 81:7 105:3 146:7 152:22 172:9 176:17 includes 133:4 including 155:8 incorporate 137:20 141:13,18 incorporated 55:14 174:5 212:24 increase 153:16 increased 153:4 independent 17:19 119:5 150:10 159:8,17 independently 182:12 index 4:5 indicate 67:10 69:4 77:22 indicated 75:20 76:25 123:4 158:20 indicates 62:5 75:6,24 146:23 indicating 11:25 130:15 indicators 163:17 167:13
--	--	--	---

<p>indirectly 59:25 individual 69:21 139:1,4 189:10 192:14 individuals 25:2 29:24 70:11,18 125:24 189:12 influence 118:14 118:25 119:8,22 120:8 200:12,19 201:13,19 202:7 informal 182:3 information 21:19 31:12 47:22,24 54:9,14 79:6 80:12 163:5 169:4 182:11 informed 54:16 115:20 120:12 121:4 193:1,8 ingram 174:6 212:24 initial 63:18 134:7 153:8 initially 36:11 126:7 145:7 153:11,11 inquire 117:24 inquired 52:1 64:12 inquirer 56:6,12 inquiries 63:18 64:14 66:10 inquiry 34:6 37:7 51:24 54:2 65:13 65:20 66:8 68:2,7 74:4 75:21 76:25 77:8,16 79:14,18 117:18,22 118:10 189:6</p>	<p>insist 94:4 instance 8:12 29:3 56:10 113:23 169:7 199:23 institution 15:17 instruct 48:1 159:6,12 instructed 62:2 193:9 instruction 82:9 84:3,13,21 85:3,10 104:23,25 112:2 113:1,4 118:5 197:20 198:4 199:3,3,20 instructions 81:9 105:2 200:1 instructs 8:20 intended 118:19 149:22 151:11 intentional 164:11 interact 127:23 interest 41:4,18 189:6 193:22 interested 6:11 52:9 64:20 69:10 69:14 98:23 134:23 143:2 193:23 206:8 interfere 10:11,15 interim 19:19 137:3 151:15 internal 200:4 internally 195:1,7 interpret 112:11 interpretation 87:24 interpreting 112:9 interview 27:17 57:22</p>	<p>interviewed 61:19 62:3 interviewing 58:17,23 60:23 61:15,22 intrude 165:14 invitations 21:17 22:3 invite 27:17 115:16 116:2 162:2,8 invited 37:5 40:6 162:4 involved 40:23 46:12 88:5 105:11 110:21 122:5 124:16 125:12 126:24 168:8 172:13 175:7 199:15 involvement 31:3 45:4 124:22 175:12 irskin 16:6 issue 9:21 125:19 142:9,14 145:5 164:18,21,24 195:16 issued 128:2 142:10,11 143:7 146:25 147:2,5 148:25 155:11 196:13 197:1 issues 121:5,9 127:22 145:2 195:22 items 24:3</p>	<p>210:25 jane 122:17 124:20 211:1 janson 2:3,7 5:19 6:18,18 7:17,19 10:19 11:1,7,12,16 11:21,23,25 12:4 25:13,21 26:13,23 26:25 28:6,8 29:11 30:12 34:15 34:25 37:15 38:3 41:9,13 48:8 50:14 51:14 52:17 56:17,23 57:5,15 60:13 63:23 66:3 68:20 69:24 70:23 71:7 73:11 75:18 76:21 77:9 80:22 81:10 82:17 86:5 89:20 90:19 91:3 92:9 93:7,10 94:18 95:25 96:21 99:8 100:17 103:19 106:5 108:19 111:19 114:6,14,22 115:1 115:9 116:18 117:2,9,17 119:19 122:20 123:2,9,12 123:16,19 128:12 132:24 134:17 135:10,17,22 136:5,18 138:6,7 144:4,11,13,20 147:23 151:1 152:9 156:25 159:15 160:16 164:15,19 165:20 165:24 166:2,5,15 166:25 167:4,7 173:13,17,22,24</p>
j			
<p>jacqueline 122:16 124:19 167:23 171:10 172:1</p>			

[janson - kruithof]

Page 21

174:8 178:18 179:6,13 182:6 183:17 184:13,21 184:25 185:10 186:23 187:4,23 188:6 189:19 190:3,12,18 191:17,25 192:11 192:18 193:2,18 194:1 195:11,20 196:1,11,17,21 197:5,13,23 198:9 198:16,22 199:7 200:24 201:3,7,10 201:16,21 202:9 203:7,25 204:17 204:23 207:5 january 16:16 17:4 30:7 60:7 111:10 147:3 148:20,23 149:8 153:12 jason 19:20 jd 6:4 jesus 27:18,25 28:12 31:6,13,17 35:8 47:12 48:20 50:20 51:1 67:9 jewish 29:1 job 19:14 33:16,20 55:9 johnson 1:12 3:3 join 54:18 127:13 joined 31:14 joining 78:1,4 jr 174:6 212:24 judging 90:9 114:15 judgment 32:4 july 38:10,14	jump 171:8,8 jumping 155:9 june 1:22 5:23 12:3 150:16 151:10,23 153:13 170:18 173:8 174:16 206:10 k karen 1:21 3:19 5:25 7:11,14,24 11:5,10 12:2 30:9 34:22 51:11 57:12 60:10 71:3,10 86:2,2 100:14 103:16 122:17 128:10 136:15 156:22 171:12 181:1 205:7 207:3 207:16 208:4,9,20 209:1,6,19 210:2,3 210:8,12 211:2,6 211:20 212:14 213:3,21 karen's 137:9,14 kate 6:18 7:19 11:11 26:21 41:8 93:6 111:15 116:15 144:10 164:12 165:6 173:20 kate's 202:1 katherine 2:3,7 keep 54:16 163:8 ken 19:22 32:25 34:22 51:11 99:17 161:9,15 162:22 208:8,20 kids 44:12,13 88:25 91:24 92:12 121:6	kind 19:13 44:14 181:20 182:3 199:10 kjanson 2:11 know 9:1,5,9,11 9:19,23 23:9,11 27:7 30:16 33:4 33:12 35:10 36:14 36:14 39:7 40:10 40:15,19 44:2,2,3 51:3 52:11,12 54:23 55:3,12 56:7,9,11,13,18 61:7,12 62:1,4,9 62:13,19,23 64:17 66:21 67:2 68:1,5 68:6,9 69:20 71:24 72:25 74:15 74:19,20,23 75:16 78:20 79:1,23,25 80:4,15,15,25 81:12 82:1,4 83:6 83:23 84:9,14,15 84:18 85:5,6 86:7 88:16 91:17,19 92:16 96:8,9,11 99:16 100:4,18 102:20 103:1,20 104:22 105:18,20 106:19,22 107:5 110:20,24 111:1,4 111:21 113:5,16 114:2,4,8,15,17,17 115:24 118:19 120:3,10,11,13,14 120:23 122:21 123:2 126:11 128:14,19 131:14 131:16,20 132:12 134:2,4,5,9,15,23 135:2 141:6,9,14	141:15 143:3 146:1,6,21 148:21 148:25 149:1,7 150:13 151:21 153:2,15,24 154:8 154:9,12,13,19 156:4,8,10,11 159:21 161:6,7,10 161:11,20 162:4 162:11 163:21 165:20 166:18 167:15 169:14 170:25 171:5 172:2,17,18 173:1 175:1,2 176:2,2,7 176:9,16,17 178:4 178:14,15,16,17 181:19 183:12 185:23 186:1,4,10 186:13,17 187:10 knowledge 24:25 28:9,24 42:13 45:3,9 47:23 48:2 49:6 69:8 81:2 83:13 85:1 96:1,7 98:6 115:14 149:5 178:5 187:15,17 195:13 196:3 197:18 198:3 200:2 known 18:3,18 knows 80:16 kristie 86:14,22,23 kruithof 19:22 32:25 33:3,5,14 34:19,22 35:23 36:5 51:11 53:25 54:15,20 55:18 133:12 161:9,15 162:1,4,23 169:12 169:21,24 170:5
---	---	---	--

[kruithof - llp]

Page 22

208:8,21 kruithof's 36:23	162:24 163:3 169:13 170:4,4,13 171:3,6	letter 11:3 71:21 71:25 73:24 75:10 78:8,11,16,23 174:4,12 207:13 212:22	licensure 129:3,6 129:15 130:4,10 139:10 140:4
I	leach's 169:15	174:4,12 207:13 212:22	life 17:19 42:10,22 43:16 66:21 67:18 83:11,15 100:2
I 1:24 5:9 206:2,18	leadership 12:16 12:18 17:14 124:18	letting 54:23	lifelong 78:2,5
label 34:18	leads 70:9	level 15:13 134:12	light 181:5
labeled 111:25 148:11 150:20 157:3	league 20:14	lexington 18:22,23	likewise 8:15 201:23
lack 43:2 44:4	leave 16:13,17	lgbtq 120:16,19,24 121:3,10,20 125:23 189:1,7,23	limit 93:12 152:4 152:11,19 153:3
lady's 53:8,16	leaving 146:25	liaise 127:19	limited 151:14 155:9 189:11
lambda 2:13 6:20 6:24	led 25:11 72:13 83:7 91:23	liaison 110:3	limits 153:20,25
lambdalegal.org 2:17,18	left 16:15,18 17:8 63:2 138:14 139:8 147:2	license 20:24 25:9 149:9,12 182:4,9,9 182:12,12 183:6 195:24 196:5 203:17	line 41:2,16 101:11,24 103:13 117:4,7 148:19 207:2,12 213:5
lane 8:1	legal 2:13 5:3 6:21 6:25 78:1,4 79:3,4 80:14,18,20 81:4 92:4,4 132:2 193:10	licensed 20:22,23 22:18,25 23:13 43:25 56:15 63:1 63:3,6,14 64:6,11 107:3 141:23 143:22 149:19 171:15 179:24 180:1,2,4 183:8	lisa 111:12 210:16
language 49:25 65:3 137:10 138:15 139:22 145:21,24 146:22 155:3 157:19,20 157:24 158:2,2,13 158:20 167:9 182:3	legalities 85:6	licensing 23:3,8,18 30:19 35:11 60:19 61:8,21 62:6,10 72:9 107:16 108:22,25 109:5,9 109:11 137:8 140:16 142:16 145:10,19,25 146:2 163:14,23 163:24 164:3,25 165:15,17 166:11 167:19 182:4 187:13	list 22:9 27:3
lapsed 181:20	legally 85:1		listed 122:25 166:18
large 206:3	legislature 129:21		listening 194:12
larger 63:17	lehman 12:20 32:24 51:8,11 53:24 54:10,14,19 55:3,10,18 60:7,10 61:2 71:3,10 79:24 82:2 132:19 132:21 133:12,17 133:23 134:3 162:22 167:23 169:20 193:10 208:21 209:6,19 211:9		lists 52:5,5 157:17 174:22
late 148:25			litigation 65:9
latest 71:21			little 23:5 31:16 40:20 59:6 82:6 99:19 155:15 160:5,7 174:16 181:10 182:21 188:15 194:3
law 131:15			live 82:9 116:16,21
laws 155:7			lived 46:2 90:21 91:5
lawsuit 47:10,13 47:16 48:17 170:8 170:23 175:5,8 188:10,11 193:16	lehman's 62:14		living 17:19 65:2 77:17,20 190:4
lawyer 7:9 9:2 15:8 80:23 159:5 203:19	lekan 1:14		llc 213:1
lay 92:3	lesbian 69:21 70:10,18		llp 2:7 3:15
lays 26:4			
leach 1:17 3:12 7:5 161:15,16 162:5,6			

<p>lobbying 127:11 locally 67:21 locate 175:5 176:21 located 126:18 176:24 locating 111:17 location 2:1 long 9:8 13:6,12 17:5 19:18 46:22 59:2 114:22 126:2 126:3 longer 114:9 175:16 184:16 195:3 look 14:11 25:12 30:2,24 34:15 35:3 37:16 38:9 41:14 47:7,8 50:16 51:4,5 52:25 57:6 60:3 65:17 66:12,13 68:11 70:3,7,24 71:18 73:4 77:13 78:7 85:21 86:7 86:11 94:19,19 103:9 111:6,20,24 111:24 112:6,10 116:13 118:9 122:8,8 128:3,13 132:16 134:18 135:23 138:24 140:6 144:5,7,24 144:25 146:11 147:11 148:10 150:19 151:5,25 152:2 155:1,1 156:17 157:3 158:4,7 160:9,9 163:10 168:19 170:21 173:4</p>	<p>176:4,11,12 177:7 177:16 178:20 looked 14:2 40:7 49:10 133:8 142:17 155:23,24 165:22 176:20 177:1,5,5 185:14 186:14 188:8 190:20 199:14,24 200:9 202:12 looking 40:16 41:1 44:11 49:24 62:14 77:10 79:16 88:24 90:10,10 92:10,24 93:4,9 101:1,4 108:20 117:23 126:11 135:3,8,11 150:11 163:25 164:15 169:21 174:14 175:13,22 178:15 185:17 188:13,19 193:14 200:13 202:19 lookout 193:12 looks 32:23 33:3 53:2,3,9 58:9 66:14,19 100:21 105:10,17,21 122:24 130:2 131:24 133:11,16 133:17,22 138:14 138:15 148:13 152:18 153:10 157:4 158:19 161:1 166:15 167:24 169:6 170:4 183:5,7 lord 50:19 51:1 lost 11:15 lot 201:13</p>	<p>love 31:13 67:23 200:22 201:2 loved 67:2 loving 67:3,4 lowe 167:23 168:4 171:10,21 172:1,7 lowe's 172:5 lunch 114:9,20,21 185:13 luncheon 115:6 lutheran 35:16 39:16,16 lutheranism 39:17 39:22 lynn 1:12 3:2</p> <hr/> <p style="text-align: center;">m</p> <hr/> <p>m 2:14 136:15 211:21 ma'am 45:25 58:6 madonna 47:11,15 47:23 48:14,18 madonna's 48:10 maia 2:15 6:24 mail 30:6,8,25 31:8,21,25 32:12 32:13,24 34:19,21 35:4,14,22 38:20 39:14 40:5,23 41:3,16,17 51:7,10 51:16,20 53:6,24 55:4,17 56:15 57:7,9,11 60:4,6,9 60:14,17 61:9,14 62:5,14 65:24 71:2,8,9,18 72:21 72:22 73:8,12 75:4,24 76:6 81:20 85:23 86:1 86:8,9,12 87:4 88:23 89:24 90:9 91:23 92:11,24</p>	<p>93:2,3 94:20 97:24 98:20 99:10 100:11,13,22 101:1,4,6 103:11 103:15,24 106:8 106:12 108:7,14 111:9,11,21 112:1 112:7,15 122:12 122:15,22 123:15 123:20 128:4,7,9 128:21,24 130:15 131:17,24 132:1,5 132:18,20,25 133:2,3,24 134:1,7 134:21 135:1,4,12 136:1,3,14,20,21 136:24 137:17 138:12 139:23,25 140:12 141:10 156:18,21 157:1,4 157:22,25 158:18 158:25 159:18 160:13 161:14,15 162:12 166:11 167:23 168:2 169:12,20 170:1,5 170:22 171:9 176:20,21 177:1 177:18 188:9,13 190:20,22 208:2,7 208:19,24 209:4,9 209:17,23 210:1,6 210:10,15,23 211:5,8,19 212:13 212:18 mails 9:19 103:21 112:12 175:13,23 175:23 176:4,13 177:8 main 2:1 3:16,21 21:9</p>
--	---	--	---

maintained 172:24 maintaining 18:4 making 108:7 121:13 man 78:1,4 manage 34:1 46:25 management 23:16 128:22 184:18 204:6 manager 23:17 24:6 183:20,24 184:2,5,10 185:6 managers 184:16 mandated 20:10 manual 105:3,7 manuals 194:5 march 34:20 37:8 38:23 39:7 148:14 148:15,24 156:19 marital 129:17,17 139:13 mark 10:20 11:8 34:16 51:7 57:8 60:5 65:19 73:7 100:9 116:4 139:17 marked 11:6 25:20 26:20 30:10 34:23 35:4 38:1 40:13 41:3 47:2 48:25 49:10 50:4 51:12 57:13 60:11 66:2 68:18 71:5 73:6,9 77:11 86:3 93:1 97:11 100:10 100:15 103:10,17 111:13 117:15 122:18 128:11 132:17,22 134:20	136:13,16 137:25 138:23 139:24 141:11 144:19 147:21 150:25 152:3 155:2 156:23 160:10,15 164:23 174:7 190:22 marking 11:1 12:1 25:16 marques 111:9,12 210:17 marriage 78:1,3 188:20 189:10,11 married 67:10 189:14 mass 87:10 101:20 107:1,12,14 108:16 master's 15:25 match 110:22,25 matching 110:16 material 83:3 materials 55:15 matter 6:1 165:2 matthews 3:21 7:8 7:8 10:25 11:11 11:13,18,22,24 12:9,15 13:5,7,12 14:9,17 26:21,24 28:1 41:7,10 47:20 63:20 80:10 80:24 89:15 92:2 93:6,8 94:6 96:17 99:5,6 111:15,23 114:12,19,24 115:3 116:15,25 117:4 123:8,11,14 135:13 138:4 152:6 159:2 164:8 164:17 165:3,10	165:13,23 166:1,8 166:20 167:1 173:10,15 179:18 179:21 180:13 207:7 mcmaster 1:16 3:11 7:4 196:13 mean 27:23 33:18 43:4 77:19 82:23 106:6,7 107:18 118:17 119:6 124:9 131:9 142:7 142:15 165:13 189:24 190:1 200:19,22 201:5,9 201:13 203:18 means 9:16,17,19 11:5,10 12:2 48:17 69:16 93:17 118:24 129:19 163:15,21 167:11 167:15 207:17 meant 58:16,22 62:16,19 93:22 95:12,13 109:6,8 media 5:24 205:8 medication 10:10 meet 62:10 171:13 171:17,22 meeting 12:23 13:3,3,4,5,7,11 60:25 61:7 62:7 88:9 90:1 133:24 134:3 137:9 162:25 169:22 170:15 171:4,23 171:25 189:6 193:22 meetings 13:16 121:13,17	meets 27:11 member 62:10 86:20,24 87:3 95:2 107:12,13,19 107:21,21 108:15 108:17 127:15 136:11 138:3 211:14 members 12:17 28:16 39:8 60:20 83:12 88:13 90:2 108:1 127:13 138:19 141:2 176:3 190:24 191:14 memorialized 189:9 memory 88:12 mental 18:23 mentioned 13:15 24:5 26:1 30:17 33:5 47:14 48:12 147:7 mentions 47:10 mentor 27:12 111:3 mentoring 110:5 112:3 mentors 109:20,22 109:23,25 110:2 110:11,17,18,22 110:25 124:6 message 85:24 86:12 170:6,24 171:1 172:5 met 12:15,19 14:25 31:6 35:8 60:19 methodist 76:17 77:1
--	---	--	--

[mhch - miracle]

Page 25

mhch 101:17,21 102:9	174:5,15,19 207:19,23 208:13	64:2,6,12,15,19,24 65:12,18,21 66:1,9	125:16,22 126:15 126:24 127:15,24
mhm 93:14 101:25 145:1	210:21 212:6,24 ministry 18:1	68:1,13,18 69:9,12 69:16,18,20 70:10	128:5 129:11 131:9,11 132:17
michael 1:17 3:12 7:5 161:15	19:20 27:18 32:5 49:17 59:14 105:3	70:12,13,17 71:1,5 72:4 73:6,9 74:15	132:22 133:20,21 134:10,20 136:12
michelle 86:14,25 87:2	120:1 195:18 minute 21:5 47:7	74:16 75:5,7,11,22 75:25 76:7,10,15	136:16,21 138:1 140:22 141:2,8,23
microphone 11:19 180:18	70:4 178:20 minutes 178:25	77:2,5,15,24 78:5 78:21 82:8,8 83:7	142:1,3 144:14,18 145:2,5 146:15,19
microphones 180:22	miracle 3:19 7:9 12:16,18 13:8	83:9,14 84:4,9,20 85:1,8,11,23 86:3	146:25 147:8,14 147:17,20,21
miles 3:15 7:3 29:9 34:12 50:12 52:15	15:9 16:11,14,15 17:4,5,7,16,17,21	86:16 87:21 89:12 89:18 90:4,5,11,20	149:3,8,12,15 150:5,21,24 153:3
69:23 70:21 75:15 76:19 79:22 82:11	18:1,11,15 19:4,8 19:18,21,24 20:16	91:4,21 93:14,18 93:24 94:3,16	156:4,8,18,23 157:7,11 159:5
90:13,24 92:6 94:9 95:20 108:13	20:22 21:2,3,7,11 21:14,24 22:6,11	95:17 96:2,2,5,14 96:15,24,24 97:1,6	160:10,14 161:24 162:1,5,8,10,20
119:14 134:13 135:7 144:2 166:6	22:11,15,16,22 23:6,11 24:21,25	97:14,20,25 98:2,4 98:7,9,12,15,20,22	163:7 167:25 168:7,9,21,24
180:20 200:25 201:24,25	25:8,15,18,19,25 26:5,8,15,16,18,19	98:24 99:1,10 100:4,10,15	170:9,14 171:4 172:23 173:7
miles.coleman 3:18	27:5,23 28:3,10,10 28:15,20,25 29:6	101:12 102:13,20 102:21,24 103:1,2	174:5,15,18 175:7 175:17 176:3
mindful 9:8	29:16,18,23 30:5 30:10,20 33:8	103:5,7,10,17 104:16,19,22	178:8,11,11 179:24 183:20,25
mine 166:24	34:18,23 37:9,13 37:18,20,23 38:1	105:23 106:3,4,14 106:19 107:6,24	184:15 185:14 186:6,7,21 187:6
minister 27:19 98:18	38:15 39:3,8 40:2 41:23 42:3,9,16,17	108:24,25 109:19 109:20,24 110:4	187:12 188:20,24 189:9,17,23 190:8
ministries 3:19 7:10 12:16,18	42:19,25,25 43:21 43:23 44:5,9 45:4	110:17 111:8,13 112:16,22,23,24	190:14 191:7 193:13,15,23
16:11 17:10,14 18:12 19:10 25:18	45:5,10,18 46:1,7 47:2,11,25 48:4,19	113:6,25 114:2 115:14,19,25	194:4,13,21 195:1 195:2,6,14,15,23
26:15,18 29:17 37:20,24 48:19	49:1,3,8 50:3,6 51:6,12 52:7,9	116:10 117:12,14 117:23 118:4,19	196:4,6 197:10,19 198:4,6 199:3,16
55:2 93:14,18,24 97:14 101:13	54:3,11 55:2,15 56:2 57:8,13 59:2	118:23,24 119:11 119:12 120:6,6,15	199:18,25 200:3 200:10 203:5,15
117:13,14 118:23 129:11 142:3	59:10,20,21 60:4 60:11 61:21 62:20	120:25 121:3,6,10 121:24 122:2,12	203:23 204:3 207:18,21,22,25
145:2 146:19 147:17,20 157:7	62:23 63:2,6,11,18	122:18 124:2	208:5,10,13,17,22
157:11 168:7			

<p>209:2,7,13,16,21 209:25 210:4,9,13 210:18,20 211:3 211:11,17,22 212:1,6,7,11,16,20 212:23 mischaracterizat... 164:10 mischaracterizes 164:9 misremembering 165:19 missed 22:20 64:10 mission 27:15 90:6 misunderstood 64:9 model 163:13,22 167:18 modeling 200:22 201:1 models 18:8 modification 151:7 152:18 modifications 165:15,16 modified 152:20 moment 11:13 41:7 111:16 204:19 month 137:18 196:5 months 39:1 126:6 126:10 153:12 moore 2:7 6:19,23 7:20 moot 146:20 morning 5:1 7:18 94:22 123:21 181:12 185:13</p>	<p>mother 85:17,20 87:9,13,21 88:17 88:20 95:6,17 102:2 105:15,22 106:13 mother's 97:15 105:14 motive 72:16 mouse 174:17 move 50:1 54:22 56:2 115:12 185:5 moved 35:17 46:14,22 185:3,4 moving 37:6 149:23 mowen 19:20 mullins 3:15 multiple 116:20 multiplicity 180:22 muslim 29:3 112:8 mzelkind 2:18</p>	<p>65:5 66:22 72:22 77:7 95:16 102:6 131:19 151:15 199:9 needed 45:15 59:2 59:7,8 175:4 176:18 needing 101:19 182:24 needs 23:21 41:8 needy 27:20 neglect 20:11 negotiate 156:9,12 negotiated 156:5 neither 52:24 206:6 nekki 11:4 174:6 207:14 212:25 nelson 3:15 nelsonmullins.c... 3:18 never 96:10 119:3 197:11 201:20 204:15 new 2:10,16 24:3 64:14 82:6 115:13 125:17 146:22 180:2,4,7 213:1 newman 3:7 5:20 7:1,1 205:1,2 news 27:19 nodding 8:11 nonchristian 64:24 190:25 nonchristians 64:20 nondenominatio... 35:19 nondiscrimination 130:6,23 141:3 146:8 154:16,21</p>	<p>164:5 nonprofit 127:7 nonprotestant 61:16 102:14 noon 13:10 normal 121:19 north 2:1 notary 206:2 213:25 note 68:14 123:3 157:8 158:24 159:22 163:13 noted 35:6 55:19 notes 9:13 75:3 178:20 181:15 notice 10:22 11:4 11:9 12:1,6 207:15 noticing 6:17 notified 145:13 169:8 november 85:25 86:13 93:2 100:12 100:22 101:2 102:12 103:12 134:22 137:18 144:16 162:16 171:16 number 6:4 10:24 26:16 31:24 37:17 38:21 40:14,17 41:15 47:5 50:5 51:6,19 53:1 57:7 57:19 60:4 63:13 63:17,17 64:5,8,11 64:11 65:18 70:6 77:12 78:10 93:1 105:18 122:11 138:2,5 139:15 140:11 146:12 150:22 153:25</p>
	n		
	<p>n 207:1 name 5:2 6:6 7:18 7:22 27:20 30:17 31:1,11 32:25 35:6 47:17,19 48:10,12 51:21 94:11 105:17 112:2 169:13 213:2,3 named 47:14 54:20 names 52:4 105:10 105:16 national 139:3 necessary 179:4 200:5 need 8:22 9:4 23:23 41:6,20</p>		

155:9 157:10,21 173:21 174:22 179:23,25,25 180:2 205:8 numbered 30:5 68:13 71:1 85:22 111:8 135:14 144:14 145:4 numbers 44:6,11 numerous 20:4 nun 31:14 ny 2:10,16	objected 87:22 96:5,14,23 102:2 104:17 106:18 163:15 167:11,16 objection 29:10 52:15 77:6 84:22 90:23 91:6 202:1 202:9 objections 6:15 94:11 199:9 obligated 85:1 observations 137:11 obtained 15:14 16:2 obviously 9:23 88:4 92:20 134:24 197:25 occurred 80:17 81:3 october 128:8 129:2 132:19 133:13 136:11 137:6 138:3 143:14 161:3 163:12 167:22 169:11 170:3 171:20 211:15 offer 84:20 91:10 91:10 171:16 195:2 offered 84:4 91:15 151:13 offering 84:11 201:5 offers 127:8 office 3:6 131:20 officer 146:15 offices 169:23 official 1:9,12,14 1:16,17 3:11,13	7:4,6 148:4 206:10 oftentimes 46:21 oh 124:8,8 135:22 137:3 152:8 okay 5:22 11:16 11:18,21 12:8,17 12:25 14:19 15:22 16:10,25 18:10 23:11 24:13 27:9 29:5,15 30:24 33:10 34:15 36:19 36:22 37:8,15 38:19 39:6,14,20 39:24 40:16 41:1 41:23 42:19 43:8 44:21 45:17,23 46:15 47:1,1 48:24 52:25 53:23 55:12,17 56:9,13 56:17,20 57:6 60:3 61:13,20 62:4,20 63:16,24 64:13,18,23 65:8 66:7,12 67:7 68:6 68:11,25 70:24 71:18 72:11,17 73:4,23 75:19 76:14 77:10 81:11 81:19 82:5 83:6 83:25 84:9,20,25 85:7,21 87:4,19 88:16,21 89:21 90:3 92:24 93:11 95:6 100:8 101:6 102:8,20 103:8 104:15,22 105:5 105:21 106:6,19 107:15,23 109:13 109:24 111:24 112:18,21 113:5	114:6,22 115:24 120:14 121:24 122:11 123:8,11 123:20 125:15 126:2,13,23 127:12,15,18 128:3,23 129:10 130:21 132:16 133:5,16,22 134:5 134:18 136:5,9,19 137:1,5,24 140:14 141:16,21 142:7 142:13 143:9,17 143:22 144:1,5,24 146:6,11 147:3,7 148:17 149:1,7,13 149:22 150:3,9,13 150:18,19 151:25 152:16 153:17 154:9 156:12,15 158:23 159:16,21 159:25 160:8 161:13,25 163:2 163:10 164:2,15 164:20 166:13 167:8,18,21 168:24 169:3,17 170:20 171:2,7 172:3,8,10,15,22 173:2,2,4,17,23 174:9,10 175:6,20 176:19,25 177:7 178:18 180:9,17 180:21 181:4 182:2 185:23 186:18 199:12 203:1,13,20 205:5 omega 15:19 omnibus 155:16 157:11 158:13
o			
o 174:5 212:24 oath 6:9 10:4 object 8:18 28:1 34:12 47:20 50:12 63:20 69:22 70:20 75:14 76:19 80:10 82:11 89:15 90:13 90:24 92:2,7 94:6 95:20 96:17 99:5 99:15 100:5 105:25 108:12 119:14 134:13 144:2 159:2,11 164:8 165:4 182:6 183:17 184:13,21 184:25 185:10 186:23 187:4,23 188:6 189:19 190:3,12,18 191:17,25 192:11 192:18 193:2,18 194:1 195:11,20 196:1,11,17,21 197:5,13,23 198:9 198:16,22 199:7 200:24 201:3,7,10 201:16,21 203:7 203:25 204:17			

[once - parks]

Page 28

<p>once 23:3 104:1 128:13 201:20 202:7 ongoing 184:3,5 online 189:6 192:20 open 38:15 42:14 46:11,11 61:4 62:18 opened 49:2 opening 37:21,25 208:15 operate 98:10,16 194:23 operated 96:2 operation 196:6 operational 105:3 operations 197:2 opinion 92:4 98:11 99:1 opportunity 56:6 84:1,12 91:15 139:2 opposed 24:10 opposite 189:15 opt 82:15 83:18 option 83:18 95:6 95:8,24 orally 132:9,10 order 37:9 150:22 150:24 151:9 152:17,21,22,24 153:5,6,21 154:7 155:24 156:2 196:14 212:10 organization 98:16 106:3 110:8 110:10 126:14,25 127:6,7 organization's 59:3</p>	<p>organize 179:3 orientation 19:18 23:1 36:1 37:5 40:2,6 56:7 123:24 129:17 130:11 139:12 190:9 origin 45:23 84:10 84:17,19,23 85:2,9 90:23 91:7 96:14 96:23 102:23 103:4 107:9 111:2 113:8,17 120:4,11 139:3 199:1 original 41:2,3,17 originate 154:10 orthodox 186:16 187:9 outcome 6:11 outline 114:15 outlined 175:4 outright 40:8 outside 80:17 81:3 87:13 89:2,3 92:1 92:14 95:19 102:4 159:8 164:13 177:17,17 overall 17:13 overseeing 18:5</p>	<p>51:19 52:25 53:5 57:18,19,19 58:4 60:18 66:14,17 69:3 71:19 87:6,7 93:1 97:11,12 101:15 103:24 106:25 111:25,25 117:8,12,22 118:1 123:24 128:25 129:12 133:5 134:24 135:2 137:6 138:22 139:15 144:25 146:12 148:17,18 150:16 152:2,3 153:14 155:2 157:3,10 158:8 161:13 163:13 167:9 171:9,20 175:3 207:2,12 213:5 pages 148:11 painful 34:1,4 palmetto 127:4 paragraph 32:1 38:10 47:9 57:21 69:2 74:2 87:5,17 89:21 93:5 94:20 97:12 129:11 138:24,25 139:8 145:4 155:16 157:21 158:1,12 158:17 161:25 paragraphs 87:5 99:9 parent 23:24 27:12 36:1 51:24 55:14 66:19 76:11 85:12 88:13,14 90:16 97:9,21 104:17 117:24</p>	<p>121:25 122:3 123:23 124:24 139:2 140:16 185:24 186:5 188:25 189:5 200:11 201:19 202:6 parenthesis 117:5 parents 18:7 20:24 21:19 22:19,25 25:3 26:9 27:24 28:11,17,22 29:1,7 29:19,24 37:10,22 37:25 38:16 39:4 39:10 46:16 47:5 49:2,4,7 52:10 53:21 59:11,22 62:23,24 64:11 65:14 69:10 70:11 70:22 75:24 83:10 90:16 95:4 98:8 98:13,24 105:13 106:10,14,17 107:3,17 108:1,9 108:22 109:2,4 113:4 115:20 118:5,13,25 119:11,21 120:6,7 125:13,18 131:11 163:9 185:6 195:16 198:25 199:19 208:16 parks 12:21 21:22 30:7,9,23 33:15 48:11,14 53:7 57:10,12,20 58:5 58:10,15,21,25 60:7,10,18 61:7,14 62:5,9 65:25 71:4 71:10 79:5,7,25 80:8 81:9,12,23</p>
	p		
	<p>pa 2:1 3:20 pafcaf 126:25 127:2,13,16,19,23 129:3 136:10 137:4,4 138:3,18 141:1,7,18 163:16 163:25 167:12 211:14 page 27:10 30:24 31:23 32:1 35:4 41:3,10,15 51:18</p>		

[parks - position]

Page 29

82:1 122:13,16 124:19 161:16,20 162:5,23,23 163:3 169:13,20 171:10 171:20 172:4,11 172:16 176:9 178:14 192:20 208:4,25 209:5,11 209:20 210:24 part 16:22 21:11 22:20 29:21,22 41:11 43:12 55:5 55:6,8,9 67:3,16 67:17 76:12 78:25 79:14 90:5 103:24 113:20 116:25 125:25 133:3 155:11 participate 84:12 99:12,23 115:17 116:2 162:17 194:7 198:8,20 participated 162:21 participating 198:11,14 particular 24:10 36:4,15,25 37:1 55:23 88:7 113:17 parties 5:12 partner 27:18 28:16,20 partners 49:17 party 6:10 108:4 206:7 passed 129:21 passing 63:21 pastor 112:4 pastors 31:4 paula 134:21 136:15 137:1	211:21 pause 199:10 pay 204:3 pdf 116:17 123:1 peek 156:16 penalized 198:7 198:11 pending 5:17 9:6 206:7 people 13:14 28:20 67:19 88:5 98:16,25 109:25 110:11 176:12 193:22 200:11 percent 44:13,20 perfect 136:9 179:6 perfectly 25:11 performing 175:18 period 38:14 67:1 143:9 148:10 172:25 periodically 9:10 permanency 128:22 permanent 149:9 149:12 permission 105:14 person 21:23 24:8 34:5 189:14,18,23 201:19 202:7 person's 190:15 personal 35:8 67:9 98:12 191:22 personally 74:24 96:12 168:8 178:6 pertains 157:10 petty 111:9,12 210:17	phone 13:13 15:3 58:10,12 phrase 65:4 200:16 phrasing 164:18 picked 8:12 piece 108:21 place 3:8 21:9 95:8 95:23 162:13,14 169:22 172:1,2 181:14,22 182:18 183:13,15 placed 45:19 46:3 101:13,21,25 113:2 120:5,24 154:1 197:9 placement 44:24 45:5,10 97:16 101:12 102:22 103:3 151:13 169:8 171:14 182:20,24 placements 46:11 150:1 168:8 placing 19:1 20:17 20:20 145:7 168:18 182:15 plaintiff 5:25 47:14 plaintiffs 1:5 2:3,5 5:19 6:19,21,23,25 7:20 65:9 173:7 174:15 178:8,13 188:10,11 193:15 plan 99:17 133:23 planned 103:25 platform 9:17 play 21:8 45:10 46:1 181:9 played 46:7	plaza 2:9 please 6:15 7:13 7:22 8:10,13,22,25 9:1 25:13 31:5 45:8 49:23 58:20 67:8,10 71:20 91:2 93:20 99:16 102:25 107:2 129:23 157:8 171:23 pm 115:5,7 179:8 179:11 205:6,11 point 8:21 16:21 29:18 39:13 65:4 65:12 70:7 72:23 79:7 108:6,14 165:25 166:9,10 179:15 180:1,5 194:12 197:19 policies 125:22 154:17,22 194:4 policy 29:17 32:2 37:14 38:15 39:3 47:3 59:4,10,21 62:21 90:20 91:4 91:8 104:23,25 107:25 125:17 187:6 188:3,4 197:20 198:4 poor 43:11 poorly 202:17 203:12 pop 116:12 popped 137:25 population 70:15 portion 151:5 posed 132:4 position 17:7,12 18:11 33:11 118:13,25 119:8 119:17,21 120:7
--	---	---	---

[position - provide]

Page 30

<p>200:11 positive 82:25 possible 9:25 129:13 201:18,23 202:6 potential 21:12 22:17,23 27:24 28:11,21 29:1,7,19 29:24 37:10 39:4 39:9 47:4 58:7 60:25 62:7,11 65:14 125:13 pr 55:15 practice 5:6 49:16 65:6 70:2 90:8 91:9,10 94:3,16,17 98:8,14 102:13 115:25 145:13,14 195:15 198:4 199:21 203:23 practices 93:15,19 93:24 194:4 practicing 50:25 89:2 92:1,14 186:19 praise 54:21 preaching 200:20 precise 44:11 precisely 186:3 predated 204:10 preference 87:11 88:11 89:1,4 91:25 92:13 97:18 108:9 113:18 114:10 preferences 108:10 preferred 88:11 preform 192:21 preparation 13:23 71:15 160:23</p>	<p>prepare 12:11,14 14:20 171:24 prepared 146:5 172:19 preparing 13:19 presbyterian 67:17 presence 80:18 81:3 164:13 present 4:1 6:12 13:15 31:4 81:25 101:19 197:25 presented 22:10 60:22 81:21 president 17:9 18:12 19:9,20 29:16 54:11 118:22 124:9 press 37:19 38:18 39:2 47:2,9 48:17 49:1,13,22 55:9,15 pretend 203:19 previous 94:10 previously 42:1 93:4 190:1 primarily 16:18 18:7 83:10 primary 127:24 principal 1:14 prior 23:1,2 26:2 39:7 61:10 100:23 101:3,4 133:8 143:17,17 146:25 160:22 164:9 203:21 private 18:19 20:16 98:15 127:7 127:8,9 130:17 privilege 80:20 159:3,12</p>	<p>privileged 47:22 47:25 80:12 probably 15:6 44:15,20 83:11 94:11 121:22 126:9 problem 166:25 173:17 problems 121:5 procedures 5:16 proceed 114:11 proceeding 6:15 proceedings 165:12 167:6 205:10 process 22:18,24 23:3,8,10 27:17 35:11 37:7 39:25 45:5,10 46:2,8 56:4 63:1 110:5 110:21,24 112:5 122:6 124:17,22 125:12 126:3 168:13 processing 123:5,6 procurement 146:13,14 production 123:3 173:8 174:21 professed 105:12 106:8 professional 19:10 19:12,25 20:4 profit 126:22 program 17:1,15 17:19,21 18:6 37:21 38:16 51:24 93:13,17,23 programs 17:15 17:25 37:25 127:9 155:19 157:14</p>	<p>208:15 prohibits 155:17 157:12 promises 178:23 proportion 44:8 proposal 137:8 proposed 129:3,6 138:16 140:3,15 164:3 165:14,18 proposes 171:21 proselytizing 201:14 prospective 37:10 49:3,7,7 53:21 59:11,22 62:22,24 63:10 64:1,10,15 70:11 75:23 98:7 98:13 107:25 108:9 109:1,4 131:10 188:25 189:5 protect 129:22 131:9 protects 131:6 protest 144:15,17 145:3,6,6 146:16 146:19 211:25 protestant 29:7,19 32:3,5,6,7,19 37:12 39:10,12,17 39:18,22 50:10 52:23 59:16 61:24 76:17 113:1 186:22 187:11,20 protestants 185:19 prove 54:22 provide 10:8 23:12 67:3 72:18 82:8 89:13,19 109:20,22 112:25 113:4 118:5</p>
---	---	---	---

[provide - received]

Page 31

127:10 141:24 142:4,22 143:4,19 149:3,15 176:22 177:12,23 178:1 provided 23:1,16 53:3 82:14,20 84:3 124:4 134:6 145:10,19,25 153:3 169:7 providers 137:21 141:13,18 157:16 190:24 provides 67:12 162:10 provision 130:3,6 130:8,16,23 146:8 152:20 provisional 196:5 provisions 138:18 155:25 166:17,18 proviso 129:21 131:2,4,9,14 psalms 117:6 public 206:2 213:25 publicly 21:16 22:3,12 published 27:5 publishing 27:8 pulido 122:17 124:20 211:1 pull 176:17 pulling 11:16,17 pumpkintown 17:17 purports 145:9,12 purpose 27:7 120:2 151:14,18 171:23 purposes 11:2 102:7	pursuant 81:8 155:11 pursuing 64:21 put 10:20 25:13 26:13 100:8,8 121:18 136:3 141:21 142:20,25 159:17,25 166:9 170:9 173:2,10 puts 87:14	questioned 52:20 questions 8:7,19 10:1,2 15:12 52:1 52:6,7,13 53:4,16 60:22 61:14,15,21 61:25 79:8,12,13 81:4,13 82:2 105:8 109:14 114:18 179:15 180:14 181:2 185:18 188:17,18 195:14 204:20 205:3 quick 15:11 147:12 quickly 111:6 152:1 quietly 99:13,23 100:2 quote 32:17 48:18 51:1 97:25 130:23 131:19 181:14 200:12 quotes 88:25	150:8 156:1 158:14 205:13 reading 49:19 76:6 82:21 109:5 130:16 139:6 reads 27:10 101:11 103:13 ready 142:9,13 real 151:25 really 59:12 181:19,21 186:20 rear 4:5 reason 9:4,21 10:7 43:14,17,19 66:25 70:14 76:3 78:17 142:11 159:8 184:9,15 185:3 191:23 192:8,15 213:5 recall 37:13 40:22 44:6 55:24 68:23 71:17 72:9,20 73:3,20,22 91:8 92:22 100:7 104:20 107:11,11 121:7,8,14,16,23 124:3 125:3,14,19 125:21 132:10,15 141:1,5 143:11 146:4,10 151:24 159:24 162:24 163:1,2 167:20 202:23 receipt 146:15 receive 12:8 15:18 24:1 63:19 received 16:6 20:8 20:9 33:13 35:24 36:9 54:16 60:24 65:13 79:14 159:4 172:6 192:20
	q		
	quarter 56:19 question 8:14,17 9:6,7 22:21 27:4 27:10 28:2 29:10 34:13 39:7 41:12 45:7 48:5,7,9 49:23 50:13 52:16 58:19 63:21 64:9 66:18 69:23 70:21 75:15 76:5,20 80:11,19 82:12 89:16 90:14,25 91:2 92:3,5,7 93:20,21 94:7 95:21 96:18 99:6 100:25 102:25 104:6 106:1,11 108:13 119:15 131:19 132:4,13 134:7,14 139:17 139:23 144:3 145:22 154:18 157:23 159:7 163:16 164:4,5,9 167:12,16 179:19 186:2 188:23 189:4 192:2 199:11 202:1,4,5 202:17 203:11	r r 126:17 race 139:3 raised 67:14 134:7 139:23 140:23 141:7 164:5 raises 145:2 rare 99:14 rarely 177:14 reaccreditation 18:5 reach 72:5,7 182:25 read 51:25 53:2 87:17 89:22 95:14 102:9 117:6 140:18 145:21,24	

<p>receiving 155:19 157:15</p> <p>recess 57:2 115:6 179:10</p> <p>recipient 31:1,10 32:14 35:5,15 39:15 51:21</p> <p>recipient's 34:8</p> <p>recognize 38:7 57:16 60:14 71:11 86:8,9 100:18 103:20 111:22 122:21 128:14,16 132:25 133:2,3 135:3 138:8 144:21 151:2,3 157:1 160:20 170:21 172:20</p> <p>recognized 34:7 136:24</p> <p>recollection 14:2,6 44:15 48:21 52:19 88:22 90:15 92:17 104:3,7 112:14 150:10</p> <p>reconciliation 155:17 157:12 158:13</p> <p>reconvene 114:21 115:2</p> <p>record 5:8,23 6:14 7:23 9:15,18 57:1 57:4 115:5,8 117:11 178:24 179:9,12 199:9 205:6 206:5</p> <p>recorded 5:24</p> <p>recording 5:13</p> <p>records 14:14 175:14,14</p>	<p>recruit 21:12 22:7 22:13 32:2</p> <p>recruited 22:10</p> <p>recruiting 125:17</p> <p>recruits 110:11</p> <p>rectified 9:24</p> <p>rector 122:16 124:19 211:1</p> <p>redacted 31:1,11 35:6 51:22 52:5 105:10,11,16 112:3</p> <p>reentered 167:5</p> <p>refer 141:14</p> <p>reference 61:13 96:18</p> <p>referenced 91:22 147:25 164:21,22</p> <p>referencing 92:16</p> <p>referrals 43:2,6</p> <p>referred 58:22 79:3,4 110:2 145:20 146:3,7 154:6 165:14 166:8,11 190:23 193:24 200:10</p> <p>referring 19:1 48:22 52:4 58:1 61:8 89:9,25 92:18 94:24 102:5 108:22 112:8 129:7,8 130:5 131:4 137:15 138:12 140:12 155:3 169:24 170:24 171:1</p> <p>refers 96:19 139:18 140:21 145:21,25 163:24</p> <p>reflect 140:22 187:1</p>	<p>reflected 153:20 185:19</p> <p>reflects 32:5 49:14 159:4</p> <p>refresh 14:2</p> <p>refreshed 14:6</p> <p>refuse 98:7</p> <p>refused 107:7</p> <p>refuses 98:12</p> <p>regard 20:5 25:7 76:10 80:8 84:18 121:10 129:14 130:9 139:10 204:2</p> <p>regarding 9:13 18:8 23:22 25:1 44:24 54:6 55:20 81:14 82:2 87:7 88:7 92:21 104:23 104:25 112:2 125:23 140:3 163:6 164:5 199:20</p> <p>regardless 61:23 88:11 89:1 91:25 92:13</p> <p>region 24:14,14,16 24:17,19,21</p> <p>regular 134:11,11</p> <p>regulation 137:8 138:16,18 140:7 140:15 146:2 164:3 165:1,15,17 166:11</p> <p>regulations 145:10 145:20 146:1 154:16,21 155:8 155:11 166:19</p> <p>rehab 16:23 18:2 126:17</p>	<p>reid 12:20 32:24 51:8,11 60:6,10 71:3,10 79:24 132:19,21 162:22 162:22 178:15 193:9 208:21 209:6,18 211:9</p> <p>reimbursement 152:4,11,20 153:3 153:7,20,24 154:5</p> <p>reissue 146:18</p> <p>reissued 146:22 149:12</p> <p>rejected 34:8 40:8 40:11 78:18</p> <p>relate 195:8</p> <p>related 6:10 19:25 72:9 101:8 125:22 140:15 172:24 175:8 206:6</p> <p>relatedly 190:14</p> <p>relates 47:23 159:10</p> <p>relating 194:5 196:14</p> <p>relation 196:19</p> <p>relationship 78:2 78:5 143:24 184:3 184:6,18 185:7</p> <p>relationships 184:11</p> <p>relatively 125:17</p> <p>release 37:19 38:18 39:2 47:2,9 48:17 49:1,13,22 55:9</p> <p>releases 55:15</p> <p>relevance 92:7</p> <p>religion 113:19 130:11 139:12 155:18 157:14</p>
--	--	---	--

<p>190:16 religious 26:5 31:12 50:7 67:22 67:23 82:9 84:3 84:12,20 85:3,10 85:18,19 88:18 90:5 92:21 94:5 95:18 96:6,16,25 97:17 98:1,4,15,21 98:25 102:7,24 103:5 104:23,25 105:24 106:3 113:1,4 118:5 119:12,24 129:22 129:25 130:24 131:6 139:17 140:21 141:4 157:16 194:5 197:12 198:8 199:2,21 remain 104:1,13 remember 12:24 13:1 36:24 37:1,3 38:17 48:13 53:15 55:23 56:1 58:11 58:13 61:6,25 71:14 85:8,13,15 85:16,18 88:6 89:23 104:15,16 118:6 121:12 125:7,9,11,15,25 129:5 132:12 149:11 158:6 165:24 171:25 172:3,4 176:23,25 178:2 181:16 185:12,17,20,22 188:13,21 189:1 194:8 199:18,21 200:12 202:3,4,19</p>	<p>remembering 88:2 remote 5:13 11:5 11:10 12:2 207:17 remotely 5:8,11 6:5,13 7:15 9:12 remove 182:19 reorganized 125:7 repeat 22:21 41:11 48:6 49:23 52:18 91:1 93:20 102:25 154:18 rephrase 28:7 76:22 164:16 replied 31:11 replies 58:5 131:18 reply 32:15 97:10 replying 31:25 report 20:12 30:22 30:22 reported 1:24 reporter 5:9 6:8 7:13 8:13 94:12 144:9,12 173:20 173:23 174:3 180:16,19,23 200:25 201:24 206:1 207:10 reporters 20:10 reporting 213:1 represent 7:20 117:19 representing 7:10 15:9 48:4 request 35:24 36:12,20 85:9 94:23 97:15 103:14 107:2 111:3 174:25 183:6 199:1,20</p>	<p>requested 36:17 53:18 104:13 107:9 146:16 157:7 176:8 200:7 requesting 57:21 requests 9:1 85:5 174:21,22 175:1,2 175:24 199:25 require 26:8 90:21 91:5 107:20 108:16 145:9,12 154:24 required 19:7 20:7 39:8,12 49:8 50:15 84:10 130:5 130:8 154:15,20 requirement 75:23 129:24,25 130:24 141:3 145:6,8,15 157:17 164:6 191:7 requirements 124:25 145:10,12 145:19,25 146:2,7 requires 98:24 129:21 requiring 90:17 rereview 77:7 research 74:17 reserved 52:13 resided 43:23 45:6 45:11 82:10 83:14 residential 17:15 20:6 45:15 46:9 89:19 90:22 91:5 91:12 92:8 127:9 127:9 149:25 194:13,16,24 195:3,8,24 196:9 196:20 197:7 199:17 202:15,24</p>	<p>203:16 residing 102:15 resolved 104:5,10 resources 124:9 127:10 respect 24:22 85:9 87:8 95:7 97:8 98:1 109:18 112:23 113:7,8 121:2,5 131:9 134:6 164:25 respecting 97:17 97:20 131:2 respects 98:21 respond 79:18 80:21 198:20 responded 132:1 159:22 responding 32:14 responds 35:15 61:2 response 31:10 32:17 34:6 71:21 71:25 72:14,19 73:1,24 78:8,11,16 78:23 93:3 105:15 106:24 131:21 132:2,3,13 133:7,9 159:14 169:6 170:5 172:5 175:9 178:7,12 181:13 183:4 responses 54:5 responsibilities 17:12 145:8 responsibility 45:2 responsible 17:13 17:23,25 18:4,6 110:16 124:6,15</p>
---	--	--	---

<p>responsive 175:24 177:2,13,24 rest 131:23 134:25 restate 29:13 result 61:9 146:19 189:15 retained 205:9 retired 18:16 retrieved 116:22 returned 158:25 reunited 45:21 revealing 55:22 review 13:22 72:8 124:23 reviewed 60:21 revise 122:2 124:14 146:17 revised 123:1,17 137:7 revising 124:12,17 revision 126:2,3 revisions 123:22 125:4,9,11,16,22 126:1,6,10 140:15 164:25 revisit 39:6 rewarded 198:13 richard 174:5 212:24 right 11:24 16:11 24:11 26:6,12 27:6 29:1,25 30:2 32:13 33:8 34:10 35:14 38:13,24 39:4 40:2 44:21 44:25 45:24 49:4 49:18 50:7 51:4 53:21 54:11 56:17 62:20 63:7,19 64:21 65:4,6,15 68:11 70:19,24</p>	<p>73:4 75:9,13 76:11 77:24 80:23 81:6 82:5 86:25 95:3 97:22 98:2 99:20,25 100:24 101:9 105:24 106:15 108:11,20 109:4 115:2 116:13 122:8 126:8 128:3,17 130:12,18 133:14 133:19,25 135:8 135:18,19 138:17 139:14,16 140:16 140:19,20,24 141:4,21,24 142:23 143:10,20 143:24 147:9 148:7,15 150:7 151:19 152:21,25 156:15 157:19 159:19,25 160:1,8 161:4,18 163:10 164:6 165:2 166:19 168:4 169:4 172:13,19 173:25 174:2 175:25 176:15 178:18 179:6,19 180:11 181:1 183:1,8,9,22 184:11,19 185:8 186:22 187:2 188:4 190:25 193:10 194:14,18 195:3 196:15,23 197:3 198:2 199:5 200:17 201:18,20 202:6,8,15 203:2,6 204:12,20 205:13 205:14</p>	<p>rights 154:25 155:10 200:11 riley 3:15 risk 87:15 rogers 1:3 2:6 6:1 7:20 65:9,13 66:15 71:22 72:1 72:12 73:1,13,25 75:4,20 76:8,15,24 78:9,12,17,23 79:9 80:9 81:14 82:3 188:12 190:21,23 191:13,19 192:5 192:21 213:2 role 18:11 21:6,9 21:23 45:4,4,10,13 46:1,7 55:13 118:22 124:2 126:24 128:20 168:6 181:9,13 roman 185:23 186:4,13,16,19 187:9,11,19 room 5:7,10 6:12 9:14 24:1 167:3 173:11 180:18 routine 113:20 rule 5:16 rules 5:16,17 8:8 192:15 run 8:9 41:23,24 131:19 176:14,14 running 42:17,25 rush 72:25 ryan 12:20</p>	<p>safety 20:7 sagewood 8:1 salvation 31:6 35:9 67:9 sandra 54:21,24 71:4,9 209:20 sandy 79:20 178:15 193:9 sat 126:7 satisfied 191:15 saved 123:17 saw 174:25 saying 32:25 108:24 123:6 169:21 185:20 says 27:15 32:16 35:15 39:15 50:18 53:7 58:5 93:17 101:25 106:8 118:12 119:7,17 131:18 133:9 134:1 137:14 138:24 139:1,8,15 140:19 145:1,5,6 145:24 148:18,19 150:16 151:7,8 152:4,10,13,13,25 155:4,16 163:22 167:10 169:8 170:6,6 171:12,22 174:18,21 sc 2:2 3:9,17,22 scandelaria 2:12 scarborough 3:15 scdss 129:19,22,24 137:7 139:18 140:22 145:14 151:14 202:14 203:6,23 schedule 174:18</p>
		s	
		<p>s 207:11 213:5 saddened 33:16 safe 67:4 safer 179:2</p>	

[scott - sharon]

Page 35

scott 1:14 screen 116:10,14 173:11,19 screened 45:16 screening 168:18 scripture 82:21 scroll 117:2,10,20 174:13 seal 206:10 search 175:7 178:6,12 searches 175:18 176:14 second 11:20 13:11 31:21 41:10 41:15 57:18,21 60:17 71:19 74:2 87:5 108:21,21 116:18 128:25 133:5 135:1 136:20 137:19 144:24,25 148:19 165:6,6 166:3 167:9 173:14 188:17 secretary 1:9,12 1:14 3:2,3,4 section 67:7 102:8 109:16 136:11,11 139:7 140:18 152:4 155:6 157:18 211:16,16 sections 66:13 see 9:22 27:9,13 27:21 31:7,20 32:8,21 35:12,20 37:15 38:11 41:21 41:22 46:13 50:16 50:22 57:24 66:10 66:15 67:5,24 73:16 74:7,13	77:10 82:19 83:2 92:15 95:9 101:22 103:23 112:3 116:4,10,24,25 117:7,21 131:21 133:6,14 135:18 137:12,22 139:19 145:16 148:12 150:18 152:8,10 152:15 153:13 155:13,21 157:17 158:9 162:7 163:19 164:16 168:1 171:7 174:10,13 seeing 92:23 105:6 117:8 seeking 80:11 130:22 seen 12:5 25:22 27:1 30:13 51:15 51:15 65:3 66:4 68:21,22,23 73:14 111:21 160:22 174:23,24,25 segregates 32:19 seminary 15:19 send 35:9 72:16 116:9 123:12 129:23 sending 86:12 129:3 157:5 sends 170:4 seneca 8:1 sense 9:25 44:7,12 44:17 59:19 64:14 sent 14:9,9,17 31:17 66:6 71:15 71:17 72:19 73:24 100:22 101:6 111:23 112:2	150:12 172:4,16 188:9 202:14 sentence 74:3 75:3 118:10 137:19 167:22 sentences 105:9 separate 101:6 110:8 136:6 september 51:9 52:6 161:3,14 serena 2:8 6:22 10:19 25:13 26:13 30:4 34:16 37:16 51:4 111:7 116:5 116:7 128:4 134:19 135:25 144:7 147:13 173:5,24 series 8:6 serve 27:12 28:17 43:9,10 127:10 186:6 served 44:8 173:7 174:15 serves 24:22 88:12 service 85:18,19 104:1,12 services 1:8,10,18 3:1,14 6:2 7:7 20:24 21:1 23:16 23:20 24:23 25:7 43:3 44:22 83:16 83:17,19,21 84:2 88:18 89:11,14,19 91:11,14,16,18 94:5 95:18 96:6 102:24 103:5 104:14,18 105:24 106:3,4 107:8 113:13 127:5 130:20 141:24	142:4,22 143:19 147:17,19 149:4 149:15 150:5 162:9 197:1 203:24 204:8 212:5 servng 98:23 185:5 servs 213:2 set 24:1 25:6 58:10 61:20,25 133:23 sets 50:6 195:7 setting 100:2 seventh 50:17 severity 5:5 sevilla 110:19 123:25 sex 67:20 69:9,13 69:17 70:19 77:22 78:13,24 79:15 125:23 155:18 157:14 188:20 189:17 sexes 189:12 sexual 129:16 130:11 139:12 189:11,13 share 27:19 49:14 54:1 116:9 135:20 137:25 173:18,19 174:9 shared 83:4 110:22 141:2,2 163:5 shares 36:2 sharon 12:22 30:6 30:9,18,19 33:15 35:24 51:20 57:21 58:1 65:25 68:15 71:3,9 73:9,12 122:13,16 124:19
--	---	---	---

[sharon - staff]

Page 36

162:25 176:9 178:14 188:9 190:21 208:3 209:10,18,24 210:25 sheet 123:6 213:1 shelter 17:18 42:9 42:20 43:13 44:18 83:11,15 shepherd 32:2 shift 82:5 short 66:25 178:19 show 125:2 162:9 163:8 showing 116:15 shutt 11:4 174:6 207:14 212:25 sic 150:21 side 195:18 sight 181:3 sign 63:6 64:24 186:6,20 205:13 signature 123:24 206:17 signatures 148:12 signed 56:10 68:14 69:18 148:13,14 148:23 157:6 158:25 204:16 signing 65:1 similar 67:13 simple 8:8 simply 76:5 sincere 188:4 single 123:6 180:17 sinkler 2:1 3:20 7:9 sisters 31:15 sit 99:12,23 100:2	sitting 100:3 situation 34:2,4 87:20 88:7 104:4 104:8 112:14 170:10 situations 104:17 104:20 six 50:17 153:12 196:5 skip 49:25 slightly 32:16 114:9 slowly 117:10,20 smatthews 3:23 smoak 169:14,14 smoothly 8:9 social 1:18 3:14 5:6 20:23,25 23:20 25:7 43:3 44:22 89:11 130:20 147:17,19 212:5 solely 124:15 solicitation 127:25 128:1 129:9 142:10,14,15,18 142:19 143:1,5,7 143:13,16,18 146:17,18,22,24 147:1,4 148:5 151:16 153:8 165:16,18 166:12 202:14,20 somebody 36:10 109:3 200:20 201:14 someone's 190:9 son 31:17 soon 9:24 129:12 sorry 11:23 13:1 21:3 22:20 29:15	40:12 41:11 58:15 65:22 99:6 100:25 103:2 107:5 111:15,17 116:20 124:10 133:1,2 135:6 138:4 139:5 144:9 165:13 173:16 174:1 192:1 200:25 201:24,25,25 203:11 sort 19:11 31:20 44:13 125:4 127:19 134:11 151:6 181:7,19 sought 84:16 sound 161:4 173:24 sounds 87:19 99:24 source 48:3 south 1:1,16,18 3:6,12,13 6:3 7:5 7:6 8:1 17:17,18 17:20 18:17,22,23 19:5 20:20 21:6 35:17 44:21 130:20 147:16,19 150:23 151:11 161:17 170:18 186:14 196:4 197:1 206:3,11 212:4,9 spartanburg 17:20 speak 13:18 14:22 21:16 22:2 55:10 72:15 83:3 94:16 95:13 98:9,18 120:1 132:8 170:12,12 171:5	speaking 11:19 46:6 132:10 specialist 23:18 specific 25:1 84:22 111:3 121:7,14,20 121:23 125:9 141:7 143:23 157:18 199:15,19 specifically 8:20 23:6 41:5,18 69:7 91:21 149:23 181:12 specifics 23:9 spirit 50:19 spiritual 26:15,19 27:5 118:14,25 119:8,21 120:8 200:12,19 201:13 201:19 202:7 207:23 spoke 99:19 170:15 spoken 15:3 spouse 66:15 spouse's 67:11 spouses 37:11 staff 18:7 58:6,16 58:23 59:1,8 60:19 61:4,8,21 62:2,6,10,17 83:12 85:19 86:20,23 87:3 88:13 90:2 95:2 99:16 107:1 107:3,6,12,13,17 107:19,20,21 108:1,5,7,10,15,17 108:24,25 109:9 109:11 112:4 114:4 121:12,17 126:6 161:23 162:3 168:19
---	---	---	---

[staff - sure]

Page 37

<p>183:24 187:14 staff's 93:12 stamp 25:15 128:5 stamped 173:6 stance 101:13,18 101:25 stand 127:2 standard 61:20 149:9 standards 19:25 20:3,5,14 23:20 138:25 stands 27:4 start 47:3 107:25 started 59:21 112:18 139:6 143:11,15 starting 74:3 starts 117:25 169:21 state 1:16,17 3:12 3:13 6:13,16 7:5 7:22 18:16,21,22 70:12 150:23 155:7 162:7 206:3 212:9 state's 5:17 stated 60:21 74:4 95:14 statement 25:9,10 25:15,19 26:1,10 27:16,16 36:2 49:9,16,20 50:3,6 50:15,17,18 51:25 54:7 55:21 56:10 60:21 63:7 64:25 65:2,2,6 68:17 69:18 70:2,4,7,9 74:6 75:6,22 77:2 77:18,21,25 78:6 91:24 92:11 94:2</p>	<p>95:22 117:15 118:1,11 131:12 185:15,25 186:8 186:15,20,21 189:9 190:5 191:9 207:20 209:15 210:22 states 1:1,7,9 3:6,7 6:2 49:14 75:10 77:25 129:13 196:25 stating 112:4 statistics 44:10 163:6 status 129:18 139:13 statutes 154:16,21 staying 23:19 step 21:4 37:7 39:25 56:3 165:5 165:8 stephen 156:19,22 212:15 steps 35:10 54:6 55:20 steve 3:21 7:8 10:22 94:21,24 99:6 114:10 123:2 179:20 steven 3:4 86:14 86:18,18 stipulate 5:12 stop 42:16 stopped 42:25 184:15 stored 177:19 stories 55:14 street 2:1,16 3:16 3:21 strengthens 37:20 37:24 208:14</p>	<p>struggle 59:13 studies 18:19 subchapter 157:17 subject 101:11 103:13 165:2 submitted 34:5 65:21 66:9,11 68:4 189:5 subp 25:19 26:19 30:10 34:23 38:1 51:12 57:13 60:11 66:1 68:18 71:5 73:9 86:3 100:15 103:17 111:13 122:18 132:22 136:12,16 144:18 147:21 150:24 156:23 207:21,25 208:5,10,17,22 209:2,7,13,16,21 209:25 210:4,9,13 210:18 211:3,11 211:17,22 212:1,7 212:11,16 subpoena 25:16 26:17 30:5 34:18 37:18 51:6 57:8 60:5 65:19 68:13 71:1 73:6 85:23 100:11 103:10 111:8 122:12 128:5 132:18 134:20 136:22 138:2 144:14 147:15 150:21 156:18 160:10,14 173:7 174:14 175:9 177:2 178:8 178:13 212:20 subscribed 213:22</p>	<p>subsequently 172:11 176:21 substantive 132:3 suggest 9:9 94:2 119:10 suggesting 95:15 suggestions 137:21 141:13,19 suggests 75:11 99:22 164:10 suite 3:8 summaries 161:2 summarize 168:15 summarizing 137:11 145:5 155:8 summary 68:15 summer 187:7 sunday 91:11 104:2,13 supervised 95:4 supervision 17:24 supervisor 12:22 19:21 30:20 supervisors 108:5 support 22:16,23 23:2,7,12 59:2,9 124:4 127:8 supported 23:21 32:6 154:1 supports 23:15 suppose 186:18 supposed 87:17 113:7,12 sure 8:9,10,15 9:24 13:2 14:11 22:22 24:3 32:11 41:9 45:9,9 48:9 49:24 56:23 58:21 69:6 80:4 84:6 91:4 93:7,21</p>
--	--	---	--

[sure - thread]

Page 38

96:19 101:17 102:9 103:1 109:7 113:12 121:13 129:9 135:7,21 138:6 142:11 143:14 154:19 158:7 166:14,22 167:4 182:22 189:3 200:3 surveyor 17:2 suspend 145:13 swaine 6:19,23 7:19 swaines 2:7 swear 5:10 7:13 swearing 5:13 switch 109:14 sworn 7:15 213:22 system 18:17 21:7 46:21 163:9 176:14	97:6 107:7 111:5 111:20 113:22 114:3,8,20,23 115:16 116:1 126:4 147:11 156:16 160:4 169:22 172:2 178:19 179:4 183:13 taken 2:3 5:15,25 8:3 87:12,23 88:18 102:3 104:11,12 107:10 talk 58:11 109:16 136:7 165:6 179:14 199:8 talked 13:19 61:11 182:21 188:15 194:3,10,11 talking 40:11 63:17 99:18 102:1 115:11 146:9 164:2 165:1 166:13,21 181:16 194:8 taylor 156:19,22 157:5 158:25 212:15 teach 119:12 teaching 32:6 teachings 96:16,25 team 12:16,18 124:18 127:11 technician 4:2,3 5:1,22 7:12 56:25 57:3 115:4,7 179:8,11 205:5 teenage 67:16 teenager 41:5,19 teenagers 44:9,19 46:17,20	tell 14:5 23:5 31:2 59:5 79:19 88:6 116:5,6,17 164:12 temporary 196:4 ten 18:21 114:7 131:25 178:25 204:3,14 tenets 26:5 74:17 tenure 103:6 133:20 term 24:13 119:2 term's 165:16 terms 149:16 154:13,19 156:5 156:13 190:15 terri 1:24 5:9 6:8 180:16 206:2,18 testified 7:15 118:3 172:17 183:19 192:13 203:4 testify 10:11,15 76:13 84:7 testimonies 35:8 67:14 testimony 10:4,8 67:9,11 148:1 164:9 181:8 205:7 texts 9:19 thank 11:22 26:24 32:10 40:18 41:4 41:18 47:1 51:23 56:22 94:13 111:17,17 129:3 144:12 166:5 167:1,2 170:6 174:3 179:13,16 181:1 203:18 204:22,24,25 205:3	thanks 33:15 54:23 61:3 62:16 123:21 165:10 166:6 180:20 theological 15:19 thereof 206:8 thereto 155:11 thing 135:18,23 166:13,21 173:3 182:14 things 8:9 99:2 110:13 127:22 142:18 147:12 175:4 think 22:2 30:17 33:3 34:17 39:24 46:19,20 48:24 52:3 63:21 65:4 66:22 93:5 97:5 100:10 116:5 118:3 122:10 124:8 127:18 129:8 130:14 136:1 143:12 148:3 155:3 158:23 164:10,17 165:15,17 173:22 177:15 179:3 181:3,3 183:19 185:18 187:7 190:22 200:15 203:4 204:13,15 204:20 thinks 168:25 third 69:2 145:7 161:25 thirds 114:16 thought 94:12 107:13 166:12 thread 34:19 38:20 51:8 85:24
t			
t 207:11 tab 10:20 25:14 26:13 30:4 34:16 37:16 51:5 57:7 60:3 65:17 68:11 70:24 73:4 85:21 100:9 103:9 111:7 116:7 122:9 128:3 132:16 134:18 135:13,15 136:6 144:7,9 147:13 150:19 156:17 160:9 173:5,5 table 137:7 138:11 take 9:4,7,23 30:2 32:18 47:6,7 56:24 57:6 60:3 70:6 77:13 86:6 95:18 96:14 97:1			

<p>111:9 128:7 135:4 135:12 136:21,24 three 18:20 42:11 42:14 47:9 50:17 126:9 145:2 till 13:9 time 1:23 6:16 9:3 16:8,22 17:3 21:24 22:1 29:16 29:21,22 30:22 31:4,5 37:8 43:21 43:24 44:4 46:22 52:6 54:10 55:1 56:19,25 57:3 59:2 67:1 71:14 71:17 83:8,25 85:8 90:4 99:25 101:19 102:12 104:16 112:17 114:8 115:4,7 128:24 137:4 148:5,10 149:8 153:9 165:11 167:2,5 171:13 172:25 176:11 179:8,11,14 180:1 180:5 181:2 188:12,24 195:5 198:24 199:9 204:24 205:3 timeline 160:12,14 161:7,8 167:10 172:19,21,24 212:19 times 35:19 72:7 99:13,24 107:24 170:16 171:16,22 timing 9:8 title 124:4 155:10 titled 26:15 37:19 117:18 138:3</p>	<p>144:15 147:15 150:22 160:12 161:7 tmc 1:6 today 8:7 9:3 10:4 10:8,12,16 13:20 13:24 14:13,20 15:1 41:25 42:14 67:19 68:3 72:23 72:24 137:9 179:14 181:2,7 183:19 185:12 188:8 189:22 194:3,11 199:15 199:24 200:10 202:12 today's 12:12 14:23 205:6 told 48:14 62:5 80:8 88:20 192:22 192:24 200:15 tony 132:18,21 211:10 top 32:1 38:9 62:15 71:8 106:25 117:8 118:3 132:1 137:17 139:15 140:18 163:12 167:9 topic 79:2 82:6 101:8 156:16 topics 109:15 115:11 total 42:11 152:4 152:11,13,19,19 152:25 153:18 205:7 touched 48:24 toured 163:6 toys 24:2</p>	<p>traditional 32:6 74:11,22 75:1,9 76:2,2 trained 18:8 19:19 training 19:10,12 19:13,14,16 57:22 transcript 4:5 205:13 206:4 transition 149:24 transitioning 17:20 transpired 57:2 115:6 179:10 transport 103:25 trauma 18:9 treated 59:15,16 59:18 76:15 99:3 187:11,20 188:1,2 treatment 198:18 198:19 tried 102:21,22 103:3 triggered 105:15 trouble 111:16 true 64:23 182:14 182:16 185:2 187:16 206:4 truthful 10:8 truthfully 10:11 10:16 try 110:21 149:24 192:4 201:20 203:14 trying 64:4 75:19 85:13 98:19 108:23 109:6 145:23 164:20 180:21 199:8 202:8 tucson 16:23 126:18</p>	<p>tuesday 86:13 tunnel 181:5 turn 51:18 82:6 turned 11:14 two 13:13 15:6 47:8 50:16 58:9 99:2 105:10,11 114:16 168:1 189:11 type 19:16 69:4 82:21,23,25 134:15 149:14 types 23:15 127:22 typical 72:3,3 typically 36:8 46:16 50:25 82:13 82:20 143:4 168:13</p> <hr/> <p style="text-align: center;">u</p> <hr/> <p>u.s. 6:1 213:2 ultimate 44:23 45:1,18 ultimately 45:19 53:9 56:9,13 um 16:3 135:17 152:24 169:19 unbelief 89:5 unclear 179:25 186:3 uncomfortable 61:1 62:8,12 107:12,14 109:9 unconditionally 67:2 undated 68:14 underlined 87:12 157:13,20,25 158:2 underlining 158:21</p>
---	---	--	--

<p>understand 8:21 8:25 10:3 19:1 32:12 43:12 59:12 64:4 93:14,18,24 93:25 95:15 98:19 108:20,23 109:6 118:17 141:22 145:23 182:23</p> <p>understanding 28:4,13,14,15,18 28:19,23 29:2,6 39:21 40:9 42:24 43:17,22 44:14 48:16 50:24 55:6 55:7 58:25 59:7 62:16 64:22 65:7 69:11,19 70:1,9,17 72:12 76:14 77:4 77:15 78:15 80:7 81:22 90:4 93:16 93:22 94:14 95:11 98:17 99:2 101:18 113:24 118:22 119:5 131:13 138:19 141:17 145:18 148:8 150:2 153:19 154:4 157:9 158:21 159:17 162:6 168:12 170:20,23 171:2 172:23 195:19</p> <p>understood 88:9 88:24 89:22 178:4</p> <p>unit 5:24</p> <p>unitarian 67:21 74:5,10,18,21,25 75:8,12 76:1,8 79:15 191:4,14,20 192:7 193:5,21</p>	<p>united 1:1,7,9 3:6 3:7 6:2 196:25</p> <p>unites 50:19</p> <p>units 205:8</p> <p>universal 75:25 193:5</p> <p>universalist 67:21 74:5,10,18,21,25 75:8,12 76:1,9</p> <p>universalist's 191:20</p> <p>universalists 191:4 192:7 193:21</p> <p>universe 14:16</p> <p>university 16:1,9</p> <p>unrelated 195:23</p> <p>unwritten 203:22 203:22</p> <p>uplifting 83:1</p> <p>ups 115:11</p> <p>upstate 24:14,16 24:19 168:1 182:24</p> <p>usdoj.gov 3:10</p> <p>use 18:25 61:22 107:21 109:11</p> <p>usually 27:4</p> <p>utilize 151:12</p> <hr/> <p style="text-align: center;">v</p> <hr/> <p>v 3:7 213:2</p> <p>validity 5:13</p> <p>valuable 83:2</p> <p>value 67:23</p> <p>valued 49:16</p> <p>variations 32:18</p> <p>variety 202:14</p> <p>various 138:17</p> <p>verbally 8:11</p> <p>veritext 5:4 6:7,8 205:9 213:1</p>	<p>vernacular 181:21</p> <p>verse 6:1</p> <p>version 71:21 138:10 147:1</p> <p>versus 194:24 195:8</p> <p>vice 17:9 18:12 19:8,19 29:16 118:22 124:9</p> <p>video 4:3 5:1,13 5:22,24 7:12 9:16 56:25 57:3 115:4 115:7 179:8,11 205:5</p> <p>videographer 5:3 6:7</p> <p>videotaped 1:20 5:8 10:5</p> <p>view 74:24 75:7,12 76:7 98:12 119:5 131:8 187:12 200:10</p> <p>viewpoint 188:4</p> <p>violates 145:14</p> <p>virtual 1:21,25 2:8 2:9,14,15 3:8,16 4:2,4</p> <p>visit 88:20 162:2,5 162:11,18 163:4 169:25 170:8</p> <p>voice 89:5</p> <p>vp 142:2 168:6 175:14,15</p> <p>vs 1:6</p> <hr/> <p style="text-align: center;">w</p> <hr/> <p>wagner 3:4</p> <p>wait 8:13,15</p> <p>waive 205:14</p> <p>waiver 197:1</p> <p>walk 32:11</p>	<p>wall 2:16</p> <p>want 29:12,12 32:11 43:9 47:6,6 53:25 66:18 77:12 85:12,14 89:5 95:17 98:16 99:12 99:23 102:23 103:4,8 111:5 114:23,24 135:7 144:5,5 147:11 156:16 165:7 178:23 180:16 182:22 189:3,3</p> <p>wanted 31:14 83:4 85:15,17,20 110:17 140:11 142:21 162:7,8 166:14,22 173:4</p> <p>wanting 58:6,16 58:23 109:23 131:1</p> <p>warranted 33:24</p> <p>way 39:21 69:2 97:16,25 103:24 114:16 150:6 179:20 187:20 198:7</p> <p>we've 9:9 13:19 56:18 75:22 104:4 104:8 112:21,22 114:6 135:18 151:19 160:1</p> <p>web 21:18</p> <p>website 21:18 22:12 51:25 65:21 66:9,11 68:2,8 69:4 101:14 116:11,16,21 117:13,23</p> <p>week 12:24 19:18 104:1 112:2</p>
---	--	--	--

[week - yvette]

Page 41

169:22 welch 1:4 2:6 7:21 65:10,13,22 66:1,9 66:11,14 68:3,16 69:1,3 71:22,25 73:1,13,25 75:4,20 76:24 78:9,12,17 78:23 188:12 190:21,23 191:13 191:19 192:5,21 209:12 welch's 72:13 76:8 76:16 79:8 80:9 81:14 82:3 welcome 162:8 170:17 205:4 welfare 19:25 20:13 wellbeing 20:8 went 39:2 55:8 170:17 wife 67:13,17 69:3 williams 111:10 112:1,8 175:15,23 176:20 willing 46:17 183:13 189:17 windows 116:20 winter 35:19 wished 194:7 wishes 85:2 87:9 87:14 97:8,21 113:7 199:4 witness 5:7,10 7:10,13 28:2,3 34:14 47:23 48:6 56:22 70:22 75:16 77:7 80:5,16 81:2 81:9,16 82:13 89:17 90:15 91:1 92:3 94:14 95:22	106:2 108:14 119:16 134:15 152:8 159:12,14 164:13 165:5,9,11 167:2,5 179:16 186:24 189:20 190:4 192:1 193:3 197:14 198:10 199:12 201:11 202:10 203:8 204:1,18,22,25 205:4,12 206:9 witnesses' 213:3 woman 54:2 78:2 78:4 wondering 146:1 word 44:4 64:10 87:16 worded 202:17 words 43:12 work 16:22 18:21 19:8,23 21:12 22:16,23 24:9 25:2 28:9,25 29:6 29:18,23 33:10 37:9 39:3 49:3 59:10 61:3 63:11 64:2,19 69:5,9,17 69:21 70:10,14,17 98:7,13 109:3 114:25 119:11 120:6,25 124:14 126:8 127:11,19 131:10 143:15 184:17 188:20,24 189:17,23 worked 17:17 18:16,19,22 28:11 43:21 62:24 69:13 110:4,5 126:5 143:18 168:4,13	197:10 working 47:4 52:9 59:21 61:3 62:17 62:22 94:21 107:25 108:2,8 109:1,10 125:17 125:23 143:12,13 185:4 195:15 works 26:9 27:24 54:3 64:7 112:24 114:1 128:17 168:22 198:6 worldwide 2:9 worse 198:19 worship 83:16,17 83:18 84:2 93:12 113:13 200:6 worthy 83:2 wounded 33:17 34:6 wrath 117:5 write 35:23 53:25 57:20 87:6 88:24 97:13 99:9 102:8 106:25 107:16 123:21 129:11 157:8 writes 31:2,13 32:1,15 35:6 41:4 41:18 51:23 54:19 54:21 60:18 61:3 66:24 67:13 69:1 69:6 71:20 72:22 74:3 93:11 94:20 94:21 95:5 103:25 105:9 112:1 137:5 137:19 146:15 162:1 171:21 writing 30:25 35:5 51:21 93:3 129:1 132:6 140:9	157:25 200:17 written 72:24 80:2 87:20 129:23 131:1 158:4,18 204:16 wrong 116:6 wrote 33:15 62:16 88:8 89:24 92:12 93:23 94:1 101:12 109:6 118:20 133:13 141:12 157:22 181:15
			x
			x 207:1,11
			y
			yeah 11:18 41:14 43:11 123:16,18 135:15 141:15 146:4 152:8 165:23 166:5,6,15 180:12 year 15:6,20 17:4 23:23 35:18 63:11 64:2,7,16 116:23 153:7 174:16 178:2 180:3,4,8 years 15:7 18:17 18:21 67:16 yep 14:11 26:23 135:10 yerrick 111:12 210:16 yesterday 13:5,12 35:25 88:25 89:23 york 2:10,16 213:1 young 31:15 youth 17:19 44:20 yvette 65:25 209:11

[zelkind - zoom]

Page 42

z
zelkind 2:15 6:24 6:24
zoom 1:21,25 2:8 2:9,14,15 3:8,16 4:2,4 6:6 9:12

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.

EXHIBIT 34



DSS Licensing Partners for the Upstate of SC

+ Abbeville

+ Anderson

+ Cherokee

- Greenville

FOSTER HOME LICENSING AGENCY SELECTION

Select the agency you would like to use for taking you through the licensing process.

Oasis of Hope is a Christian-based agency, but works with any individual or family who has a desire to make a difference in a child's life. There is no requirement for additional training beyond the 14 hours of pre-service training, unless specific needs of the child warrant additional instruction.

Thornwell began licensing foster families in 2017 and serves all types of families.

Epworth serves married couples and singles who want to foster. The agency serves families from any faith background and training is not faith-based.

SC YAP works with any individual or family who has a desire to serve children.

Growing Homes SE works with any individual or family who has a desire to serve children.

Connie Maxwell serves married couples and single parents who want to foster.

Miracle Hill serves Christian foster parents and requires families to complete a statement of faith.

SC Church of God Home for Children serves Christian individuals and families of any denomination who want to foster and meet the basic requirements to do so in addition to signing a statement of faith and morality statement.

Nightlight Foster Care Program serves married couples that have been together at least two years and singles over the age of 25 who want to foster. The agency serves families from any faith background and training is not faith-based.

New Foundations' CONNECTIONS Foster Care Program works with all individuals and families who have a desire to care for the needs of children. We are here to serve those willing to make a difference in a child's life.

+ Greenwood

+ Oconee

+ Laurens

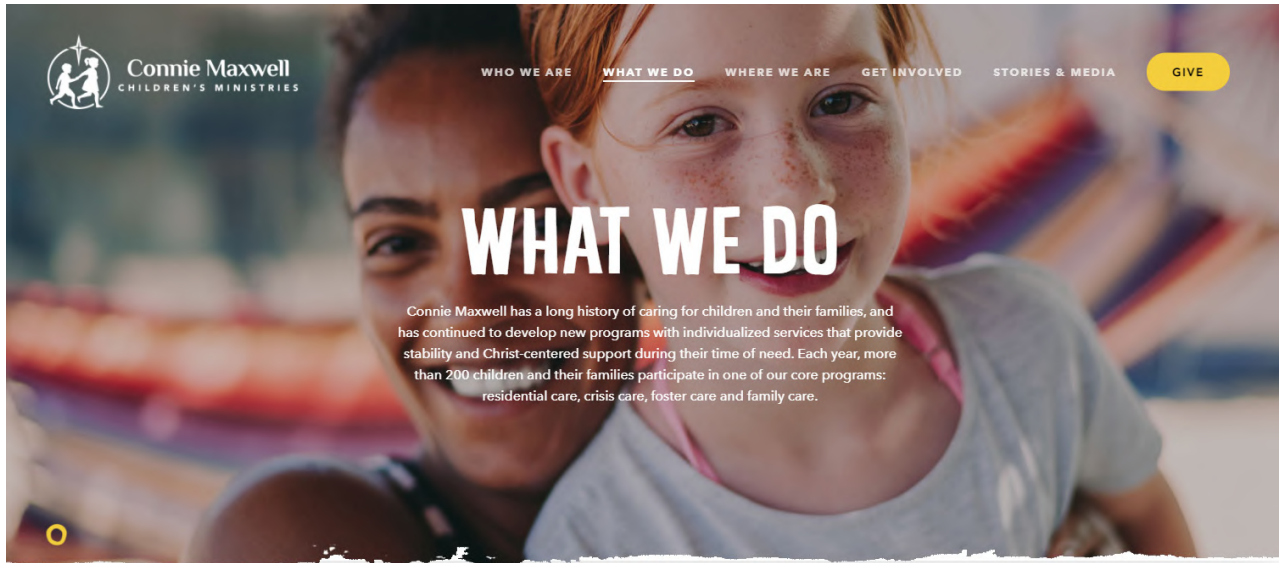
+ Newberry

+ Pickens

+ Spartanburg

☰ DSS Licensing Partners

EXHIBIT 35



Connie Maxwell
CHILDREN'S MINISTRIES

WHO WE ARE WHAT WE DO WHERE WE ARE GET INVOLVED STORIES & MEDIA

GIVE

WHAT WE DO

Connie Maxwell has a long history of caring for children and their families, and has continued to develop new programs with individualized services that provide stability and Christ-centered support during their time of need. Each year, more than 200 children and their families participate in one of our core programs: residential care, crisis care, foster care and family care.

OUR MINISTRIES



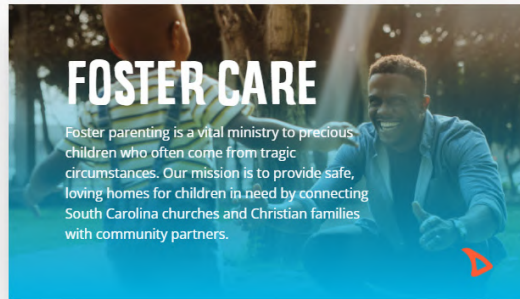
RESIDENTIAL CARE



FAMILY CARE




CRISIS CARE



FOSTER CARE

Foster parenting is a vital ministry to precious children who often come from tragic circumstances. Our mission is to provide safe, loving homes for children in need by connecting South Carolina churches and Christian families with community partners.



GET IN TOUCH





Connie Maxwell
(Headquarters)
810 Maxwell Avenue
Greenwood, SC 29646
Toll Free: (800) 868-2624

[CONTACT US](#)

QUICK LINKS

- [Programs](#)
- [Events](#)
- [Stories](#)
- [Job Opportunities](#)
- [Privacy Policy](#)


FOLLOW US

JOIN OUR NEWSLETTER

Enter your email [JOIN](#)

Registered 501(c)(3). EIN: 57-0324927

© Copyright Connie Maxwell Children's Ministries 2020. All Rights Reserved. 

**Exhibit
0005**

EXHIBIT 36

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION
EDEN ROGERS AND BRANDY WELCH,
Plaintiffs,

vs. C.A. No. 6:19-cv-01567-JD

UNITED STATES DEPARTMENT OF HEALTH AND
HUMAN SERVICES; XAVIER BECCERA, IN HIS
OFFICIAL CAPACITY AS SECRETARY OF THE
UNITED STATES DEPARTMENT OF HEALTH AND
HUMAN SERVICES; ADMINISTRATION FOR
CHILDREN AND FAMILIES; JOOYEUN CHANG, IN
HER OFFICIAL CAPACITY AS THE SENIOR
OFFICIAL PREFORMING THE DUTIES OF THE
ASSISTANT SECRETARY OF THE
ADMINISTRATION FOR CHILDREN AND
FAMILIES; JOOYEUN CHANG, IN HER OFFICIAL
CAPACITY AS PRINCIPAL
DEPUTY ASSISTANT SECRETARY OF THE
ADMINISTRATION FOR CHILDREN AND
FAMILIES; HENRY MCMASTER, IN HIS
OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF SOUTH CAROLINA; AND MICHAEL
LEACH, IN HIS OFFICIAL CAPACITY AS STATE
DIRECTOR OF THE SOUTH CAROLINA
DEPARTMENT OF SOCIAL SERVICES,
Defendants.

VTC 30(b)(6)
DEPOSITION OF: SC DSS, Through its agent:
DIANA TESTER
DATE: December 16, 2021
TIME: 9:32 a.m.
LOCATION: Zoom-Columbia, SC
TAKEN BY: Counsel for the Plaintiffs
REPORTED BY: Roxanne Easterwood, RPR
VIDEOGRAPHER: Roosevelt Hamilton

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES OF COUNSEL:

ATTORNEYS FOR PLAINTIFFS:

Cravath Swaine & Moore
By: Mika Madgavkar
Katherine Deringer Janson
(Appearing by VTC)
825 Eighth Avenue, Suite 4043B
New York, NY 10019
mmadgavkar@cravath.com
kjanson@cravath.com
(212) 474-1989

Lambda Legal
By: Currey Cook
Maia Zelkind
(Appearing by VTC)
120 Wall Street, Floor 19
New York, NY 10005
ccook@lambdalegal.org
mzelkind@lamdalegal.org
(212) 809-8585

American Civil Liberties Union (ACLU)
By: Leslie Cooper
(Appearing by VTC)
125 Broad Street, 18th Floor
New York, NY 10004
lcooper@aclu.org

ATTORNEYS FOR UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES, ET AL. :
United States Attorney's Office South
Carolina

By: Barbara M. Bowens
(Appearing by VTC)
1441 Main Street, Suite 500
Columbia, SC 29201
barbara.bowens@usdoj.gov
(803) 929-3000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ATTORNEYS FOR HENRY MCMASTER, IN HIS
OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF SOUTH CAROLINA; and MICHAEL
LEACH, IN HIS OFFICIAL Capacity AS
STATE DIRECTOR OF THE SOUTH CAROLINA
DEPARTMENT OF SOCIAL SERVICES:

Nelson Mullins Riley & Scarborough
BY: Miles Coleman
(Appearing by VTC)
2 W Washington Street, Suite 400
Greenville, SC 29601
miles.coleman@nelsonmullins.com
(864) 373-2300

(INDEX AT REAR OF TRANSCRIPT)

1 A. It -- you know, it bounces. I'm
2 sorry, my eye. It looks like it went up from 2017
3 to '18 to 2018, 2019, and then it looks
4 like -- I'm having trouble seeing the last column.
5 It looks like it did increase, yes.

6 Q. And do these numbers include the
7 number of families interested in kinship care?

8 A. Yes, they would be kin homes inside
9 those numbers.

10 Q. And -- and could you just briefly
11 explain kinship care?

12 A. Kinship care is a -- it is a relative
13 or fictive kin who steps forward and says that
14 they are able to -- to take care of the child, and
15 they do have to be licensed -- in this report,
16 these are licensed homes -- so that the child is
17 in a safe setting, but with -- with family instead
18 of somebody that they are not familiar with.

19 Q. Is it possible that these numbers
20 increased due to DSS's increased focus on kinship
21 care during the same period, so that 2017 to 2018
22 period?

23 MR. COLEMAN: Object to the form of the
24 question.

25 You can answer.

1 THE WITNESS: You know, kin homes have
2 increased. We, at DSS, believe that's a good
3 thing, because children are being placed with
4 family.

5 BY MS. MADGAVKAR:

6 Q. So -- so that might be responsible for
7 the uptick in numbers we see here?

8 A. It could be.

9 Q. Are you aware of any of the factors
10 that -- that led to this increase in the number of
11 foster homes?

12 A. I do know that the program area has
13 been actively recruiting. There's been these town
14 hall meetings with foster home associations to try
15 to increase foster homes. We, of course, want an
16 increase in family-like settings, but specifically
17 kin.

18 Q. And are you familiar with the
19 executive order Governor McMaster passed in 2018
20 related to faith-based CPAs?

21 A. I would not have recalled specifically
22 on that order. I may be aware of it, but I -- I
23 don't know which order you're referring to, to be
24 honest.

25 Q. So it's -- it's the order that -- that

1 directs DSS not to deny licensure to faith-based
2 CPAs solely on account of their religious identity
3 or religious belief. Does that -- does that sound
4 familiar?

5 A. I -- I think -- I -- I don't know.
6 I -- I'm sure that I've heard of it. I -- you
7 know, I -- quite honestly, I don't keep track of
8 orders like that. I -- I just don't. I'm sorry.

9 Q. Is there any way to know
10 whether -- whether the granting of that order or
11 of the waiver had any impact on the number of
12 foster homes?

13 MR. COLEMAN: Object to the form of the
14 question.

15 But you can answer.

16 THE WITNESS: No. I mean, there would
17 have to be, like, a huge research,
18 statistical-type study to see if there's an
19 association, and -- and, really, I -- I don't even
20 know how they would control all of the variables.

21 BY MS. MADGAVKAR:

22 Q. Right. The DSS didn't look
23 into -- into whether the -- the waiver or the
24 executive order affected the number of foster
25 homes, right? We talked about that earlier.

1 A. Not that I'm aware of, no.

2 Q. So I'm about to -- to move into a
3 different topic. I don't know if -- if now is a
4 good time for a break for you, Ms. Tester, or --

5 A. It would be a lovely break -- time for
6 a break. Thank you.

7 Q. Okay. All right. No problem. So
8 is -- is ten minutes okay?

9 A. Yeah, ten, is good.

10 VIDEOGRAPHER: All right. The time on
11 the monitor is 10:19 a.m. We're going off the
12 record.

13 (A recess was taken.)

14 VIDEOGRAPHER: Time on the monitor
15 is 10:32 a.m., and we're back on the record.

16 BY MS. MADGAVKAR:

17 Q. Okay. So before moving on to -- to
18 the next topic, I just wanted to loop back,
19 briefly. And it might be helpful if you look
20 at -- at Exhibit 1, which is the subpoena. And
21 you can let me know when -- when you have it up.

22 A. I see it.

23 Q. So as we discussed earlier, you're the
24 designee for Topic 9, correct?

25 A. That's correct.

1 Q. And just to make sure I have it right,
2 your -- your testimony was that DSS has no
3 knowledge about whether permitting South Carolina
4 CPAs to restrict eligibility of prospective foster
5 parents based on religion, same-sex relationship,
6 or LGBTQ status had any effect on the number of
7 available foster parents in South Carolina?

8 MR. COLEMAN: Object to the form of the
9 question.

10 But you can answer, if you're able.

11 THE WITNESS: As far as I know, we did
12 not do any studies like this. I did not do any
13 studies like this. I do not know.

14 BY MS. MADGAVKAR:

15 Q. And -- and you're testifying on behalf
16 of DSS, right?

17 A. Yes, I am. Again, I -- I am not aware
18 of it.

19 Q. So you said you're not aware of it,
20 and that means that DSS has not done any kind of
21 study about that infor- -- information, right?

22 MR. COLEMAN: Object to the form of the
23 question.

24 But you can answer.

25 THE WITNESS: I am not aware of DSS

1 doing any study on that particular subject. I
2 -- I -- I am not aware. I'm sorry.

3 BY MS. MADGAVKAR:

4 Q. And -- and you're -- you're the only
5 DSS employee that would have done such a study?

6 A. I really -- I -- I'm not sure. I -- I
7 don't believe that anybody else would have done it
8 at DSS, but DSS is a very large agency. But I'm
9 not aware of anybody having done that study.

10 Q. And as part of your preparation for
11 the deposition, did you attempt to find out if
12 anybody had conducted the study?

13 A. No, I did not, because I -- no -- no,
14 I did not.

15 Q. And did you discuss with anyone, or
16 did you attempt to find out whether anyone at DSS,
17 beyond a specific study, made any effort to
18 examine the impact that these restrictions would
19 have on the number of available foster parents in
20 South Carolina?

21 A. So say your question again. Let me
22 make sure I'm understanding it.

23 Q. Sure. So beyond a -- a specific
24 study, did you attempt to discern from anyone at
25 DSS whether DSS had looked into or examined the

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DISTRICT**

EDEN ROGERS and
BRANDY WELCH,

Case No.: 6:19-cv-01567-JD

Plaintiffs,

-against-

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;

XAVIER BECERRA, in his official capacity as
Secretary of the UNITED STATES
DEPARTMENT OF HEALTH AND HUMAN
SERVICES;

ADMINISTRATION FOR CHILDREN AND
FAMILIES;

JANUARY CONTRERAS, in her official
capacity as the Senior Official Performing the
Duties of the
Assistant Secretary of the ADMINISTRATION
FOR CHILDREN AND FAMILIES;

JEFF HILD, in his official capacity as Principal
Deputy Assistant Secretary of the
ADMINISTRATION FOR CHILDREN AND
FAMILIES;

HENRY MCMASTER, in his official capacity
as Governor of the STATE OF SOUTH
CAROLINA; and

MICHAEL LEACH, in his official capacity as
State Director of the SOUTH CAROLINA
DEPARTMENT OF SOCIAL SERVICES,

Defendants.

DECLARATION OF NEKKI SHUTT

I, NEKKI SHUTT, hereby declare as follows:

I am a member of the bar of South Carolina and a Partner in the law firm Burnette Shutt McDaniel, PA, counsel for Eden Rogers and Brandy Welch (together “Plaintiffs”).

I submit this declaration in support of Plaintiffs’ motion for summary judgment, filed on November 17, 2022.

1. Since 2019, I have served on the team of lawyers representing Plaintiffs in the above-captioned litigation, along with members of my co-counsel group, who are from Cravath, Swaine & Moore LLP, American Civil Liberties Union Foundation, South Carolina Equality Coalition, Inc., Lambda Legal Defense and Education Fund, Inc.

2. In this litigation, the South Carolina Department of Social Services (“DSS”) has taken the position that it “is unaware of any CPA serving in the Upstate Region [other than Miracle Hill] who will decline to work with a prospective foster parent on the basis of the prospective foster parent’s religion or same-sex marriage.” (Ex. A, February 18, 2022 Letter from Miles Coleman to Kate Janson at 2.)

3. DSS’s counsel stated that DSS’s knowledge is based on its review of “information provided to it by CPAs and its own records of any requests for exemptions and the receipt of any complaints (or the lack thereof).” (Ex. B, April 4, 2022 Letter from M. Coleman to K. Janson at 1.)

4. While discovery was ongoing, counsel for Plaintiffs learned through deposing DSS representatives that Heartfelt Calling contracts with DSS to serve as a “centralized application and intake line” for DSS. (Ex. C, Barton Tr. at 40:14-23.) DSS conducts “a large

portion” of its intake work “through [its] central intake system through Heartfelt Calling.” (*Id.* at 35:08-11.)

5. When prospective foster families apply through Heartfelt Calling, they are directed to a list of CPAs and are provided information about each of those CPAs to find “the right fit for their family . . . for licensure.” (*Id.* at 135:23-136:06.) Heartfelt Calling has a website listing CPAs serving the Upstate Region and this website specifically notes whether CPAs do *not* have religious requirements. (Ex. D, Staudt Tr. 99:23-100:04; Exhibit E, Staudt Dep. Ex. 13.)

6. On June 3, 2021, Heartfelt Calling’s website stated that SC Church of God Home for Children serves only “Christian individuals and families of any denomination who want to foster and meet the basic requirements to do so in addition to signing a statement of faith and morality statement.” (Ex. E, Staudt Dep. Ex. 13.)

7. On July 12, 2022, Heartfelt Calling’s website stated that, “Miracle Hill serves Christian foster parents and requires families to complete a statement of faith.” (Ex. F, Heartfelt Calling Website, July 12, 2022.) The website also stated that Connie Maxwell “serves Christian families who want to foster.” (*Id.*)

8. On November 15, 2022, the foster care inquiry form on Miracle Hill’s website stated: “As an evangelical Christian foster care agency, we believe foster parents are in a position of spiritual influence over the children in their homes. Therefore, we require that foster parents who partner with us be followers of Jesus Christ, be active in and accountable to a Christian church, and agree in belief and practice with our doctrinal statement”. (Ex. G, Miracle Hill Website, November 15, 2022.)

9. **Exhibit A** is a true and correct copy of a letter from Miles Coleman to Kate Janson, dated February 18, 2022.

10. **Ex. B** is a true and correct copy of a letter from Miles Coleman to Kate Janson, dated April 4, 2022.

11. **Exhibit C** is a true and correct excerpted copy of Dawn Barton's deposition transcript.

12. **Exhibit D** is a true and correct excerpted copy of Lauren Staudt's deposition transcript.

13. **Exhibit E** is a true and correct copy of a page from Heartfelt Calling's website as it appeared on June 3, 2021 and as it was presented as an exhibit at Lauren Staudt's deposition on June 4, 2021.

14. **Exhibit F** is a true and correct copy of a page from Heartfelt Calling's website as it appeared on July 12, 2022.

15. **Exhibit G** is a true and correct copy of the foster care inquiry form as it appeared on Miracle Hill's website on November 15, 2022.

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

Executed on November 17, 2022.



Nekki Shutt

EXHIBIT A



NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AND COUNSELORS AT LAW

Miles E. Coleman
T 864.373.2352 F 864.373.2925
miles.coleman@nelsonmullins.com

2 W. Washington Street | Fourth Floor
Greenville, SC 29601
T 864.250.2300 F 864.232.2925
nelsonmullins.com

February 18, 2022

Via electronic mail

Kate Janson
Cravath, Swaine & Moore LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019-7475
kjanson@cravath.com

RE: *Rogers et al. v. U.S. Dept. of Health and Human Servs. et al.*
Civil Action No. 6:19-cv-01567-JD (D.S.C.)
Our File No. 059326/01501

Kate:

I am writing in further response to your letter of January 11, 2022 and our subsequent written and telephonic correspondence relating to your informal discovery requests. This letter and the enclosed materials provide the requested information to the extent of SCDSS's ability, and this concludes our efforts related to your requests.

Enclosed with this communication are updated version of two documents discussed during Ms. Tester's deposition (Exhibits A and B of your letter of December 23, 2021). The enclosed versions of these documents contain data through December 31, 2021. Also enclosed are documents showing the number of children in foster care in the Upstate Region for each year of the past five years and the number of staff members providing support to foster families for each CPA serving the Upstate Region for each year of the past five years.

Earlier this week you received from me copies of SCDSS's current contracts for non-therapeutic foster care services with CPAs serving the Upstate Region. I have not gathered the contracts between adoption agencies and SCDSS even though adoption agencies can and sometimes do assist individuals and couples seeking licensure by SCDSS as foster parents, sometimes, though not always, in relation to an adoption. In addition, enclosed with this letter are SCDSS's current contracts for therapeutic foster care serves with the CPAs serving the Upstate Region.

In addition, you asked for information regarding the number of children in the Upstate Region who are eligible for adoption but for whom adoption placements have not been identified. As of February 1, 2022, there are 77 children in the Upstate Region who are legally free for adoption but for whom no adoptive placement has been identified. SCDSS further notes that due to the way

Rogers v. HHS et al.
February 18, 2022
Page 2

its database and records are organized, and due to changes in that database and records organization in past years, any attempt to calculate these numbers for prior dates is both extremely labor intensive and may, in fact, yield inaccurate results. Accordingly, SCDSS has not and, indeed, cannot accurately calculate the number of children eligible for adoption but for whom an adoptive placement had not been identified in the Upstate Region in prior years.

You also asked for information regarding the number of foster parents working with Heartfelt Calling as compared to the number of foster parents working directly with a private CPA for each year of the past five years. After consultation with SCDSS's Accountability, Data, and Research Division, the Placement Division, and the Procurement Division, we have determined that SCDSS does not collection this information and, therefore, is unable to provide it to you.

In regard to your request for information relating to the CPAs listed in Exhibits A and B to your letter of December 23, Jackie Lowe previously testified regarding the CPAs that serve in or have offices in the Upstate and support non-therapeutic foster homes. *See* Lowe dep. Tr. at 190–97. In addition to the CPAs she discussed in her testimony, three additional CPAs listed in Exhibits A and B of your letter have offices in the Upstate and support non-therapeutic foster homes: (1) New Foundations – Therapeutic CPA (which is licensed both for therapeutic and non-therapeutic foster care), (2) Lifeline Children's Services, and (3) Adoption Advocacy, Inc. For the avoidance of doubt, enclosed with this letter is a document listing the CPAs serving in the Upstate Region along with their dates of licensure and whether they are licensed for therapeutic foster care, nontherapeutic foster care, or both.

You asked whether any therapeutic CPAs operating in the Upstate Region have also offered non-therapeutic foster care services, and, if so, how many non-therapeutic foster families been licensed by SCDSS in association with those CPAs during each of the past five years. As shown in the documents produced concurrently with this letter, all of the CPAs in the Upstate Region who are licensed for therapeutic foster care services are also licensed for non-therapeutic foster care, and some of the placements with which therapeutic CPAs assist are non-therapeutic placements. SCDSS was unable to determine, however, the number of non-therapeutic foster care licenses were assisted by the therapeutic component of those CPAs.

Finally, in regard to your questions regarding which CPAs serving in the Upstate Region “accept” or “exclude” prospective foster parents on the basis of the prospective foster parents' same-sex marriage or religion, as noted in my prior response to your letter, Ms. Lowe has already testified on behalf of SCDSS in response to those questions. SCDSS's answer remains the same: with the exception of Miracle Hill Ministries, SCDSS is unaware of any CPA serving in the Upstate Region who will decline to work with a prospective foster parent on the basis of the prospective foster parent's religion or same-sex marriage.

Very truly yours,



Miles E. Coleman

Rogers v. HHS et al.
February 18, 2022
Page 3

CC: (by electronic mail):

Peter Barbur
M. Malissa Burnette
Serena Candelaria
Bob Cook
Currey Cook
Leslie Cooper
William Jordan
Daniel Mach
Mika Madgavkar
Christie Newman
James Powers
Christopher Ray
Rebecca Schindel
Nekki Shutt
Jay Thompson
Ken Woodington

EXHIBIT B



NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AND COUNSELORS AT LAW

Miles E. Coleman
T 864.373.2352
miles.coleman@nelsonmullins.com

2 W. Washington Street | Fourth Floor
Greenville, SC 29601
T 864.250.2300 F 864.232.2925
nelsonmullins.com

April 4, 2022

Via electronic mail

Kate Janson
Cravath, Swaine & Moore LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019-7475
kjanson@cravath.com

RE: *Rogers et al. v. U.S. Dept. of Health and Human Servs. et al.*
Civil Action No. 6:19-cv-01567-JD (D.S.C.)
Our File No. 059326/01501

Dear Kate:

Pursuant to our discussion with Judge Dawson on March 15, 2022 and our subsequent meet-and-confer on March 30, 2022, I write in further reply to your letter of February 23, 2022 and, in particular, to your inquiry about SCDSS's knowledge regarding CPAs in the Upstate Region that will work with prospective foster parents, including same-sex couples, without regard to the CPA's religious beliefs or the prospective foster parents' religious beliefs. Over more than 18 months of discovery, Plaintiffs have repeatedly asked—and SCDSS has repeatedly answered—this question. Nevertheless, in a good-faith effort to resolve outstanding areas of disagreement, and pursuant to Judge Dawson's instructions, SCDSS provides this additional response.

As explained previously, SCDSS's knowledge is based on its review of the information provided to it by CPAs and its own records of any requests for exemptions and the receipt of any complaints (or the lack thereof). Accordingly, SCDSS's response to your question is based on the fact that no CPAs other than Miracle Hill have sought to claim an exception or exemption; the fact that extensive discovery in this case and a related case has not uncovered any evidence of CPAs other than Miracle Hill which, on the basis of the CPA's religious beliefs or the prospective foster parents' same-sex marriage or religious beliefs, will refer to other CPAs or to SCDSS inquiries or applications they receive from prospective foster parents; the fact that SCDSS's personnel annually request and review each CPA's policies, procedures, and materials as part of the annual CPA licensing process (which is the way that SCDSS became aware of Miracle Hill's policy) but have found no indication therein of any CPA other than Miracle Hill that will refer applications to another CPA or to SCDSS if the prospective foster parent cannot affirm and adhere to the CPA's religious beliefs and requirements; and the fact that SCDSS provides avenues for prospective foster

Rogers v. HHS et al.
April 4, 2022
Page 2

parents to submit complaints to SCDSS, including complaints regarding CPAs, and SCDSS has received no complaints regarding any other CPA that, on the basis of its religious beliefs or the prospective foster parents' same-sex marriage or religious beliefs, is unwilling to work with individuals or couples who inquire about becoming foster parents.

Based on this information and review, to SCDSS's knowledge, all of the CPAs serving in the Upstate, with the exception of Miracle Hill Ministries, are willing to work with prospective foster parents, including same-sex couples, without regard to additional criteria based on the CPA's own religious beliefs or the prospective foster parents' religious beliefs.

Very truly yours,

A handwritten signature in blue ink that reads "Miles E. Coleman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Miles E. Coleman

CC: (by electronic mail):
Peter Barbur
M. Malissa Burnette
Serena Candelaria
Bob Cook
Currey Cook
Leslie Cooper
William Jordan
Daniel Mach
Mika Madgavkar
Christie Newman
James Powers
Christopher Ray
Rebecca Schindel
Nekki Shutt
Ken Woodington

EXHIBIT C

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION
EDEN ROGERS AND BRANDY WELCH,
Plaintiffs,

vs. C/A No. 6:19-cv-01567-JD

UNITED STATES DEPARTMENT OF HEALTH &
HUMAN SERVICES; XAVIER BECERA, IN HIS
OFFICIAL CAPACITY AS SECRETARY OF THE
UNITED STATES DEPARTMENT OF HEALTH &
HUMAN SERVICES; ADMINISTRATION FOR
CHILDREN AND FAMILIES; JOOYEUN CHANG, IN
HER OFFICIAL CAPACITY AS THE SENIOR
OFFICIAL PERFORMING THE DUTIES OF THE
ASSISTANT SECRETARY OF THE
ADMINISTRATION FOR CHILDREN AND
FAMILIES; JOOYEUN CHANG, IN HER OFFICIAL
CAPACITY AS PRINCIPAL
DEPUTY ASSISTANT SECRETARY OF THE
ADMINISTRATION FOR CHILDREN AND
FAMILIES; HENRY MCMASTER, IN HIS
OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF SOUTH CAROLINA; AND MICHAEL
LEACH, IN HIS OFFICIAL CAPACITY AS STATE
DIRECTOR OF THE SOUTH CAROLINA
DEPARTMENT OF SOCIAL SERVICES,
Defendants.

VTC 30(b)(6) SC DSS, Through its agent:
DEPOSITION OF: DAWN BARTON

DATE: December 17, 2021
TIME: 9:33 a.m.
LOCATION: Zoom - Columbia, SC

TAKEN BY: Counsel for the Plaintiffs
REPORTED BY: Roxanne Easterwood, RPR
VIDEOGRAPHER: Roosevelt Hamilton

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES OF COUNSEL:

ATTORNEYS FOR PLAINTIFFS:

Cravath Swaine & Moore

By: Rebecca Schindel

Serena Candelaria

(Appearing by VTC)

825 Eighth Avenue, Suite 4043B

New York, NY 10019

rschindel@cravath.com

scandelaria@cravath.com

(212) 474-1989

Lambda Legal

By: Currey Cook

Maia Zelkind

(Appearing by VTC)

120 Wall Street, Floor 19

New York, NY 10005

ccook@lambdalegal.org

mzelkind@lamddalegal.org

(212) 809-8585

American Civil Liberties Union (ACLU)

By: Leslie Cooper

(Appearing by VTC)

125 Broad Street, 18th Floor

New York, NY 10004

lcooper@aclu.org

ATTORNEYS FOR UNITED STATES DEPARTMENT OF

HEALTH & HUMAN SERVICES, ET AL.:

United States Attorney's Office South

Carolina

By: Marshall Prince

(Appearing by VTC)

1441 Main Street, Suite 500

Columbia, SC 29201

marshall.prince@usdoj.gov

(803) 929-3000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ATTORNEYS FOR HENRY MCMASTER, IN HIS
OFFICIAL CAPACITY AS GOVERNOR OF THE
STATE OF SOUTH CAROLINA; and MICHAEL
LEACH, IN HIS OFFICIAL CAPACITY AS
STATE DIRECTOR OF THE SOUTH CAROLINA
DEPARTMENT OF SOCIAL SERVICES:

Nelson Mullins Riley & Scarborough
By: Miles Coleman
(Appearing by VTC)
2 W Washington Street, Suite 400
Greenville, SC 29601
miles.coleman@nelsonmullins.com
(864) 373-2300

(INDEX AT REAR OF TRANSCRIPT)

1 kin, under- -- understanding it's a broader
2 definition of kin, based on what DSS considers
3 kin, can parents who are not kin -- potential
4 foster parents who are not kin no longer apply
5 directly through DSS to become licensed?

6 A. So this was a -- this was a practice
7 change and not a policy change. Let me clarify
8 that. This was something that we decided to -- we
9 needed to build some capacity to be able to really
10 intensify our search and engagement and
11 recruitment of kinship families. And so we
12 transitioned all of that work to our child-placing
13 agencies.

14 And so with that being said, we -- we
15 wouldn't deny somebody the ability to come --
16 to -- to still come, and if they didn't want to
17 work with any of our CPAs today, they -- we would
18 still support them through the licensure process.
19 They could still -- they could still come through
20 DSS if for some reason they did not want to work
21 with one of the child-placing agencies. So we
22 wouldn't deny anybody that -- that ability.

23 Q. Was the reason for the change in
24 practice because DSS didn't have the capacity to
25 handle all of these applications itself; it needed

1 to offload some of this work onto the CPAs?

2 A. The change of practice was so that we
3 could really intensify our focus and efforts on
4 kinship care.

5 Q. But -- but just so I understand, the
6 idea being that you couldn't do both; you couldn't
7 focus your efforts on kinship care and also handle
8 all of these non-kinship applications?

9 A. Yes. It was a way for us to be able
10 to have the capacity to -- to do a targeted focus
11 on recruiting and licensing and engaging our
12 kinship opportunities for our kids, and it also
13 was a way to really try to build our placement
14 array, frankly, because if you -- if you're just
15 focused on recruiting non-kin families, A, kids do
16 better when they're with people that they're
17 connected to and they already know. It's less
18 traumatic. There's so many benefits to kinship
19 care; and B, if you have kinship and non-kin
20 families that you are able to place kids with,
21 that just expands your family-like settings for --
22 for kids.

23 Q. Right. But assuming that -- that
24 people who previously were able to work with DSS
25 are now able to work with CPAs; is that right?

1 A. I don't understand the question.

2 Q. Well, your answer about expanding the
3 array assumes that the people who previously were
4 able to work with DSS can now work with private
5 CPAs; is that right?

6 A. They can work with private. They've
7 always been able to work with -- with private
8 CPAs. That's always been an -- an option. We
9 just really, we just shifted a large portion of
10 the work through our central intake system through
11 Heartfelt Calling.

12 That -- that's the centralized place
13 that all of the applications and intakes funnel
14 through. We contract with -- with them to -- to
15 do that piece of the work for us, and so now that
16 families were just given more choices other than
17 DSS.

18 Q. So -- so Heartfelt Calling is a
19 central place -- so -- so if I'm a potential
20 foster parent, I'm not kinship, I'm not kin to any
21 potential child, I would go to Heartfelt Calling
22 to apply to become a foster parent?

23 A. That -- you can go -- that -- that's
24 where most people go because it's -- it's sort of
25 the centralized place that is designated to do

1 that. They could go directly to a CPA. So I
2 think it happens both ways.

3 Q. Do you have a sense -- you -- you said
4 most people do Heartfelt Calling. Is that
5 something that DSS tracks?

6 A. Yes.

7 Q. Okay. And do you have a sense of --
8 of the breakdown and how many people go through
9 Heartfelt Calling versus working directly with a
10 private CPA?

11 A. I don't -- I don't have -- I don't
12 know if I have the private CPA data, like -- well,
13 I shouldn't say I.

14 I think we could get the C- -- the
15 private CPA data. Heartfelt Calling tracks all of
16 the calls and applicants that they get through --
17 through our centralized line.

18 Q. And when you say we, DSS, could get
19 the private CPA data, does that mean that DSS has
20 that data or that DSS could ask for that data?

21 A. I'm not sure if that's something we
22 track through the contracts. If that's -- you
23 know, they have reporting requirements through the
24 contracts. So I don't know if that's the natural
25 part of what they report, or if we would have to

1 actually ask them for it.

2 Q. Has DSS ever asked private CPAs how
3 many people are applying through them to become
4 foster care parents?

5 A. Yes.

6 Q. When does it ask that question?

7 A. We -- I know we started tracking this
8 somewhat. We have to report through our annual
9 progress and services reporting for the federal
10 government, and so, you know, that's some of the
11 information that -- that I believe we supply for
12 that -- those reporting purp- -- reporting
13 purposes annually. So I do think that -- if
14 that's data that you -- you would be interested
15 in, I do think that's something that we could get
16 for you.

17 Q. Fantastic. Okay. And so just -- just
18 to make sure I'm clear about what it is, it would
19 be data that would show how many people are
20 applying directly through private CPAs to become
21 foster parents, you -- you think that would be
22 data you would have?

23 A. Yes. I can def- -- I -- I can most
24 definitely say that Heartfelt Calling has been
25 tracking that since -- at least since July, since

1 we started transitioning that work over to the
2 child-placing agencies. They have a breakdown
3 of -- of what that is.

4 Q. Okay. And -- and then, hopefully,
5 there would also be a breakdown for the private C-
6 -- for the direct channel in --

7 A. Yes.

8 Q. -- the Heartfelt Calling -- okay.
9 Terrific.

10 MS. SCHINDEL: So, Miles, I may not
11 call this out every time, but I will -- we will
12 make sure to gather all of this up and make sure
13 that we're following up with you afterwards.

14 MR. COLEMAN: Yes. That's on -- I
15 think this one, too, we can -- we can figure it
16 out, you know, next week. I think we may -- if
17 I'm understanding what you're looking for, you may
18 already have that data from Diana's deposition
19 yesterday, but we -- we can -- we can figure that
20 out Monday or something like that.

21 MS. SCHINDEL: Okay. Great. Thank you.

22 BY MS. SCHINDEL:

23 Q. And if -- if someone applied to work
24 directly with a CPA and were turned away by that
25 CPA for whatever reason, would DSS learn about

1 that?

2 A. The only way we would learn about it
3 would be if -- if the family contacted us or --
4 or -- and -- and that's the only way we would know
5 about it.

6 Q. Okay. So DSS wouldn't -- there's no,
7 sort of, tracking mechanism for DSS to account for
8 who's applying and being turned away?

9 A. Each CPA, as I understand, tracks
10 that, but that is not something that we track.

11 Q. And when you say each CPA tracks that,
12 is it tracked -- what makes you say that each CPA
13 tracks that data?

14 A. I mean, I'm -- I'm making a large
15 assumption that -- that that would be something
16 that a CPA would track, but we do not -- we do not
17 track that. We actually don't even get -- from --
18 from a child-placing agency, we -- we don't get
19 the actual packet for licensure. That's kind of
20 when we become aware that -- that -- that an
21 applicant has applied and -- and the CPA has been
22 working with them.

23 Now, Heartfelt Calling, obviously,
24 collects data on the front end. So if that
25 applicant came in through Heartfelt Calling,

1 Heartfelt Calling would -- would track -- they
2 follow up with the child-placing agencies that
3 these families have chosen to go to, and they
4 follow up to -- to -- to determine, because
5 they're tracking how -- you know, when -- when
6 they actually finish the process. So when they
7 started the application and then when an -- when a
8 license was actually issued.

9 So if they came through Heartfelt
10 Calling, I'd say, again, starting last July to
11 current, we probably would be able to have that
12 information, but otherwise, prior to that time we
13 would not have necessarily known.

14 Q. Got it. And what -- why don't you
15 explain, sort of, what Heartfelt Calling is?

16 A. So we have a contract with the South
17 Carolina Foster Parent Association, and there's
18 several components within that contract that they
19 provide support to the agency for, and one of the
20 components is Heartfelt Calling.

21 And so it is the centralized
22 application and intake line that they have. It's
23 HeartfeltCalling.org. There's a, like, 1-88 (sic)
24 number that people can call. They have a couple
25 of folks on staff that, if you call, if you email,

1 they will walk you through the application
2 process, and they have -- and so they do all of
3 that upfront work, and then they -- they send that
4 application to whatever -- today, to whatever
5 child-placing agency a family chooses.

6 So they don't choose the family for --
7 choose the CPA for the family. The family is
8 given a list of all of the available CPAs, and --
9 and they -- they then choose their own.

10 Q. And did Heartfelt Calling exist before
11 July 2020?

12 A. Oh, yes.

13 Q. But it played, it sounds like, a
14 different -- a slightly different role before that
15 time; is that right?

16 A. They were -- they were just main -- I
17 mean, at that time, prior to last July -- prior to
18 July 2020, they were just screening applicants for
19 us, for -- for DSS, and then we -- when we shifted
20 some of that work and shared that work with the
21 CPAs, they began doing that upfront screening and
22 -- and work for -- to help -- help the CPAs and
23 the families get to where they wanted to go.

24 Q. So I'm going to ask you a couple of
25 more state-related questions, and you can just

1 tell me. If it's something that you know the
2 answer, terrific. Otherwise, tell me if -- DSS to
3 provide is, which is, before July 2020, how many
4 families per year, say, roughly, starting in 2018,
5 did DSS recruit who were not applying under the
6 kinship care umbrella?

7 A. So I don't have that data in my head,
8 but that is data that we would be able to -- to
9 get you.

10 Q. And then the -- the same question
11 slightly different is, before July 2020, how many
12 families were trying to serve as kinship care
13 foster parents?

14 A. Yeah, I -- we would -- we could -- we
15 could try to get you that data. Again, we -- we
16 began tracking that data pretty closely, and our
17 big push with kinship started roughly two years
18 ago. So -- so you will -- you will see a huge
19 increase between, I'd say, like, 20- -- the end of
20 2018 to -- to now or either 20- -- early 2019 to
21 now.

22 We -- we have had a large spike in the
23 number of licensed kinship care providers, because
24 we started off with, really, like, around, I want
25 to say, 5 and -- and now we're -- we're into the

1 aware of the screening criteria implemented by the
2 CPAs in South Carolina?

3 A. Yes.

4 Q. And DSS tracks that information?

5 A. Again, I think -- I think your -- your
6 track is -- is -- is throwing me. We're aware of
7 the CP- -- of each individual CPA's criteria,
8 but -- but as far as -- I don't know what you mean
9 by tracking that.

10 Q. And you're aware of each individual
11 CPA criteria how? By -- by simply by looking at
12 the CPA's website, or does DSS follow up with the
13 CPAs or in some way ask CPAs to tell them what
14 their screening criteria are?

15 A. So that would be a part of -- of their
16 submission when they become a CPA. That -- that
17 would be part of information that -- that they
18 provide to us as a child-placing agency, when
19 they're issued -- when they're the child-placing
20 agency license.

21 Q. Okay. Can you tell me on this list
22 which CPAs that DSS knows accepts families
23 regardless of sexual orientation or religion?

24 A. DSS would know all of them.

25 Q. And can you tell me which ones on the

1 list DSS knows accepts families regardless of
2 sexual orientation or religion?

3 A. I can tell you the ones that -- that
4 I, today, as the DSS representative know, which
5 may not -- which may not be inclusive of all of --
6 you know, of all of them on the list.

7 Q. Yeah, I think -- I think you should go
8 ahead and do that, because I do think that this is
9 a topic that you were meant to be educated on. So
10 I think you should -- I think you should go ahead
11 and do that.

12 A. So ask -- so can you ask the question
13 again?

14 Q. Yes. Which of these on this list does
15 DSS know accepts families regardless of sexual
16 orientation or religion?

17 A. Okay. So it would be Alston Wilkes,
18 Broadstep, CAPA, Family Preservation, Growing
19 Homes Southeast, Crosswell, Justice Works -- which
20 Justice Works, I wasn't aware they even had
21 families. They -- they provide services. So I
22 don't even know that that's related to this -- but
23 New Foundations, SC Mentor, SC YAP, Specialized
24 Alternative Youth. And those are the ones that
25 I'm aware of.

1 Q. Okay. And so then for the rest, does
2 DSS know which agencies exclude families based on
3 religion or sexual orientation?

4 A. DSS --

5 MR. COLEMAN: Same -- same objection.
6 But you can answer.

7 THE WITNESS: DSS would know -- would
8 know -- would know that information or does know
9 that information, so yes.

10 BY MS. SCHINDEL:

11 Q. Okay. And so how many -- so DSS knows
12 exactly how many CS- -- CPA options are available
13 for non-Christians and for same-sex couples?

14 A. Yes.

15 Q. And what -- does DSS do anything to
16 relay that information to anybody?

17 A. So if -- if you go on the -- the
18 HeartfeltCalling.org website, there is a list of
19 the CPAs, and -- and it -- it does -- they -- they
20 share just a little bit about who -- what their
21 mission is and -- and -- and so that's -- I mean,
22 that's how families are directed.

23 When they -- when they apply today
24 through Heartfelt Calling, they're directed to a
25 list of CPAs, and -- and there's -- there's

1 information about each of those CPAs the CPA has
2 provided about their organizations, so the
3 families can make the right -- you know, make the
4 right fit for their family for who they want to
5 work with on collecting all of the requirements
6 for licensure.

7 Q. So does that -- that website that
8 you're referring me to, does it say Miracle Hill
9 will not work with same-sex couples?

10 A. I have not looked at -- looked at that
11 in some time. So I -- I can't say that it says
12 that specifically or not. I would -- I would have
13 to -- I would have to look at it.

14 Q. Then how do you reconcile those two
15 statements that you just gave me? You said a
16 family can go to the website and know exactly who
17 they can work with, but you actually don't know if
18 the website, in fact, does provide that
19 information; is that right?

20 MR. COLEMAN: Object to the form of the
21 question.

22 You can answer.

23 THE WITNESS: It gives information
24 about the organization, which could include that.

25 BY MS. SCHINDEL:

1 Q. Right. But the information might not
2 actually tell families who they can and cannot
3 work with; is that right?

4 A. That's correct.

5 Q. In total, how many non-therapeutic
6 CPAs serve Region 1?

7 A. I don't have -- I don't have that
8 information. I -- I didn't -- I don't have those
9 numbers.

10 MR. COLEMAN: Same objection. I object
11 to --

12 (Crosstalk.)

13 THE WITNESS: I mean, we have those
14 numbers. I just don't have those numbers here
15 today.

16 BY MS. SCHINDEL:

17 Q. If DSS learns that most of the
18 non-therapeutic CPAs that serve Region 1 excludes
19 same-sex couples, would that concern DSS?

20 A. I think it would -- I -- I think it
21 would concern us, but I also would say that, in
22 the same light, families always have another
23 option. They can always come through DSS.

24 Q. If most of the non-therapeutic CPAs
25 that serve Region 1 excluded same-sex couples,

1 could that harm efforts to grow the pool of foster
2 families in Region 1?

3 A. I -- I would say, no, because we would
4 serve -- we would serve those families. There --
5 there's still an option for those families through
6 the department.

7 Q. Since DSS changed its practice to
8 handle just kinship applicants, you said that, and
9 you're saying now, that DSS would handle
10 non-kinship applicants if the family didn't want
11 to work with a particular CPA; is that right?

12 A. Yes.

13 Q. Has DSS handled any non-kinship
14 applicants since the change in policy?

15 A. I -- I don't -- I don't know. I would
16 have to look at -- at each region to make that
17 determination, if -- if we've actually accepted.
18 It's been very few, if -- if any.

19 MS. SCHINDEL: Okay. Well, this is
20 definitely Topic 5. So this -- this is
21 information we absolutely will need to get from
22 DSS, which is whether DSS has handled any non- --
23 non-kinship applicants since the change in
24 practice or policy. And if so, how many.

25 BY MS. SCHINDEL:

EXHIBIT D

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

-----X

EDEN ROGERS and
BRANDY WELCH,
Plaintiffs,

vs. CASE NO. 6:19-cv-01567-TMC

UNITED STATES DEPARTMENT OF HEALTH
AND HUMAN SERVICES;
ALEX AZAR, in his official capacity as SECRETARY of
the UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
ADMINISTRATION FOR CHILDREN AND FAMILIES;
LYNN JOHNSON, in her official capacity as ASSISTANT
SECRETARY of the ADMINISTRATION FOR CHILDREN AND
FAMILIES;
SCOTT LEKAN, in his official capacity as PRINCIPAL
DEPUTY ASSISTANT SECRETARY of the ADMINISTRATION
FOR CHILDREN AND FAMILIES;
HENRY MCMASTER, in his official capacity as
GOVERNOR of the STATE OF SOUTH CAROLINA;
MICHAEL LEACH, in his official capacity as STATE
DIRECTOR of the SOUTH CAROLINA DEPARTMENT OF SOCIAL
SERVICES,

Defendants.

-----X

VIDEOTAPED
DEPOSITION OF: LAUREN COLLINS STAUDT
(APPEARING VIA VIRTUAL ZOOM)
DATE: June 4, 2021
TIME: 9:05 AM
REPORTED BY: TERRI L. BRUSSEAU
(APPEARING VIA VIRTUAL ZOOM)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

LOCATION OF
THE DEPONENT: Law Offices of
Davidson Wren & DeMasters
1611 Devonshire Drive, 2nd Floor
Columbia, SC
TAKEN BY: Counsel for the Plaintiffs
(Rebecca Schindel)

APPEARANCES OF COUNSEL:

ATTORNEYS FOR THE PLAINTIFFS

EDEN ROGERS and BRANDY WELCH:
CRAVATH SWAINES & MOORE, LLP
BY: KATE JANSON
(APPEARING VIA VIRTUAL ZOOM)
REBECCA SCHINDEL
(APPEARING VIA VIRTUAL ZOOM)
MALAVIKA (MIKA) MADGAVKAR
(APPEARING VIA VIRTUAL ZOOM)

Worldwide Plaza
825 Eighth Avenue
New York, NY 10019
(212) 474-1989
kjanson@cravath.com
rschindel@cravath.com
mmadgavkar@cravath.com

LAMBDA LEGAL DEFENSE AND EDUCATION
FUND, INC.

BY: CURREY COOK
(APPEARING VIA VIRTUAL ZOOM)
MAIA ZELKIND
(APPEARING VIA VIRTUAL ZOOM)
120 Wall Street, 19th Floor
New York, NY 10005
(212) 809-8585
ccook@lambdalegal.org
mzelkind@lambdalegal.org

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ATTORNEYS FOR THE DEFENDANT
MICHAEL LEACH, IN HIS OFFICIAL CAPACITY
AS STATE DIRECTOR OF SOUTH CAROLINA
DEPARTMENT OF SOCIAL SERVICES:

DAVIDSON WREN & DEMASTERS, PA
BY: JONATHAN RIDDLE
(APPEARING VIA VIRTUAL ZOOM)
1611 Devonshire Drive, Suite 200
Columbia, SC 29204
(803) 806-8222
jriddle@dml-law.com

ATTORNEYS FOR THE DEFENDANTS
HEALTH AND HUMAN SERVICES,
ADMINISTRATION FOR CHILDREN AND
FAMILIES, THE SECRETARY OF HHS, LYNN
JOHNSON, THE ASSISTANT SECRETARY OF
ADMINISTRATION OF CHILDREN AND
FAMILIES, AND STEVEN WAGNER, ASSISTANT
SECRETARY OF ADMINISTRATION CHILDREN
AND FAMILIES:

UNITED STATES ATTORNEY'S OFFICE
DISTRICT OF SOUTH CAROLINA
BY: CHRISTIE NEWMAN,
ASSISTANT UNITED STATES ATTORNEY
(APPEARING VIA VIRTUAL ZOOM)
55 Beattie Place, Suite 700
Greenville, SC 29601
(864) 282-2100
newman@usdoj.gov

ATTORNEYS FOR THE DEFENDANT
HENRY MCMASTER, IN HIS OFFICIAL
CAPACITY AS GOVERNOR OF THE STATE OF
SOUTH CAROLINA:
NELSON MULLINS RILEY & SCARBOROUGH, LLP
BY: MILES COLEMAN
(APPEARING VIA VIRTUAL ZOOM)
1320 Main Street, 17th Floor
Greenville, SC 29201
(803) 799-2000
miles.coleman@nelsonmullins.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ALSO PRESENT:

**George Libbares, Concierge Technician
(Appearing Via Virtual Zoom)**

**Darin Weaver, Video Technician
(Appearing Via Virtual Zoom)**

(INDEX AT REAR OF TRANSCRIPT)

1 A. We are not -- we have not been made
2 aware of any others.

3 Q. Have you taken any steps to figure out
4 which ones will only work with foster parents that
5 share their religious beliefs?

6 A. Not -- no.

7 Q. Are you familiar with the South
8 Carolina Foster Parent Association?

9 A. To some degree, yes.

10 Q. What is the South Carolina Foster
11 Parent Association?

12 A. It's a -- it's an association to
13 support foster parents and the -- you know, the
14 overall community that involves, you know,
15 providers, potential applicants, et cetera.

16 Q. Is it affiliated with DSS?

17 A. I mean, they're kind of a partner or
18 stakeholder, but not employees of DSS.

19 Q. Are you -- excuse me. Are you familiar
20 with Heartfelt Calling?

21 A. Yes.

22 Q. What is Heartfelt Calling?

23 A. I think it's kind of an arm of that,
24 that -- that's where all the initial -- or when
25 potential foster parents' applicants, they go to

1 Heartfelt Calling first to kind of -- I mean, they
2 can go to the individual CPAs, but most of them go
3 through Heartfelt Calling so that they can kind of
4 get their training and get a lot of the initial
5 things done before they go to a CPA.

6 Q. Is DSS affiliated with Heartfelt
7 Calling?

8 A. I don't know exactly the -- how
9 intertwined it is, if it's a contract or what, but,
10 you know, it's kind of a partner as well.

11 MS. SCHINDEL: Can we mark Tab 43.

12 (EXHIBIT 13, Document entitled DSS
13 Licensing Partners for the Upstate SC, was marked
14 for identification.)

15 MS. JANSON: Okay. That one's been
16 marked.

17 BY MS. SCHINDEL:

18 Q. I'll just read into the record while
19 waiting for you. This is Exhibit 13. It's not
20 Bates stamped. It's a printout from a Web page.
21 And if you could let me know when you have it
22 available.

23 I'm sorry, do you -- okay. This is a
24 printout of the Heartfelt Calling website for the
25 page called DSS Licensing Partners for the Upstate

1 of South Carolina. Have you seen this Web page
2 before?

3 A. It's been awhile, but, yeah, I have
4 seen it at some point.

5 Q. And you see it's just the Greenville
6 button is expanded. Do you see that?

7 A. Um-hum.

8 Q. And do you see for Epworth it says:
9 Epworth serves married couples and singles who want
10 to foster. The agency serves families from any
11 faith background and training is not faith-based.

12 Is that right?

13 A. Yeah.

14 Q. This indicates that Epworth did not
15 serve unmarried cohabitating couples, is that
16 right?

17 A. I mean, it could mean that. I don't --
18 I don't know.

19 Q. Do you know whether Epworth serves
20 unmarried cohabitating couples?

21 A. I'm not aware one way or the other.

22 Q. Do you see Lutheran -- Lutheran, it
23 says -- oh, interesting. I apologize. It was --
24 it seems this has been cut off.

25 Do you see for -- for Miracle Hill and

1 the South Carolina Church of God Home For Children
2 it says that both CPAs require statements of faith?

3 A. Um-hum. Yes, I see that.

4 Q. Were you aware that Miracle -- Miracle
5 Hill requires that -- applicants to complete a
6 statement of faith?

7 A. Yes, I'm aware from the past, yes.

8 Q. Were you aware that South Church --
9 South Carolina Church of God Home For Children
10 requires families to complete a statement of faith?

11 A. I don't know if I was. I don't
12 think -- I don't think I was aware of that.

13 Q. Is it fair to say that you aren't aware
14 of what the requirements are for that statement of
15 faith?

16 A. That's fair.

17 Q. Do you know whether it's clear from
18 South Carolina -- do you know whether South
19 Carolina Church of God Home For Children makes
20 clear that they require a statement of faith to
21 potential applicants or to DSS?

22 A. No, I don't know.

23 Q. Do you know who provides the
24 information that appears on this Heartfelt Calling
25 web page?

1 A. No, I don't.

2 Q. Is someone at DSS responsible for
3 assessing which CPAs require statements of faith or
4 limit individuals in terms of their work?

5 A. I'm not aware of someone with that
6 task.

7 Q. In your experience in the child welfare
8 field, do you believe that allowing agencies to
9 exclude families based on their religious
10 objections to those families' religion or sexual
11 orientation has any effect on the pool of families
12 available for children?

13 MR. COLEMAN: Object to the form of the
14 question.

15 THE WITNESS: Do I think it limits it?
16 Yes.

17 BY MS. SCHINDEL:

18 Q. In your experience has allowing such
19 discrimination hindered DSS's efforts to meet the
20 need for potential foster families?

21 A. DSS needs many foster families and
22 we're in need of fosters now, so we're, you know,
23 eliminating potentials that I think it does hurt
24 that.

25 Q. Would you agree that more than one CPA

EXHIBIT E



DSS Licensing Partners for the Upstate of SC

+ Abbeville

+ Anderson

+ Cherokee

- Greenville

FOSTER HOME LICENSING AGENCY SELECTION

Select the agency you would like to use for taking you through the licensing process.

Oasis of Hope is a Christian-based agency, but works with any individual or family who has a desire to make a difference in a child's life. There is no requirement for additional training beyond the 14 hours of pre-service training, unless specific needs of the child warrant additional instruction.

Thornwell began licensing foster families in 2017 and serves all types of families.

Epworth serves married couples and singles who want to foster. The agency serves families from any faith background and training is not faith-based.

SC YAP works with any individual or family who has a desire to serve children.

Growing Homes SE works with any individual or family who has a desire to serve children.

Connie Maxwell serves married couples and single parents who want to foster.

Miracle Hill serves Christian foster parents and requires families to complete a statement of faith.

SC Church of God Home for Children serves Christian individuals and families of any denomination who want to foster and meet the basic requirements to do so in addition to signing a statement of faith and morality statement.

Nightlight Foster Care Program serves married couples that have been together at least two years and singles over the age of 25 who want to foster. The agency serves families from any faith background and training is not faith-based.

New Foundations' CONNECTIONS Foster Care Program works with all individuals and families who have a desire to care for the needs of children. We are here to serve those willing to make a difference in a child's life.

+ Greenwood

+ Oconee

+ Laurens

+ Newberry

+ Pickens

+ Spartanburg

☰ DSS Licensing Partners

EXHIBIT F

Greenville

Foster Home Licensing Agency Selection

Select the agency you would like to use for taking you through the licensing process.



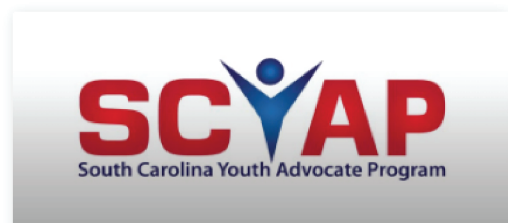
Nightlight Foster Care Program

Nightlight Foster Care Program serves married couples that have been together at least two years and singles over the age of 25 who want to foster. The agency serves families from any faith background and training is not faith-based.



Oasis of Hope

Oasis of Hope is a Christian-based agency but works with any individual or family who has a desire to make a difference in a child's life. There is no requirement for additional training beyond pre-service training unless specific needs of the child warrant additional instruction.



SC YAP

SC YAP works with any individual or family who has a desire to serve children.



Miracle Hill

Miracle Hill serves Christian foster parents and requires families to complete a statement of faith.



The Bair Foundation

The Bair Foundation is a Christian therapeutic agency that licenses families for foster children 0-21. We work with therapeutic, medically fragile and special needs foster children. To serve the needs of DSS, they will place non-therapeutic children as well. We do not discriminate and open our doors to married, single, cohabitating, same sex couples, and all religious backgrounds. 32 recertification hours are required every two years for re-licensure for therapeutic homes.



Epworth

Epworth licenses and supports individuals or married couples/families who desire to provide a loving, safe, and temporary home where hurts are healed, and hope is nurtured for children in foster care. Epworth trains those individuals through evidence-based models to equip them with interventions to work with children that have encountered traumatic situations.



Lutheran

Lutheran is affiliated with the Lutheran Church, but serves all families and does not require a statement of faith. Families do not need to be Christian to foster with Lutheran.



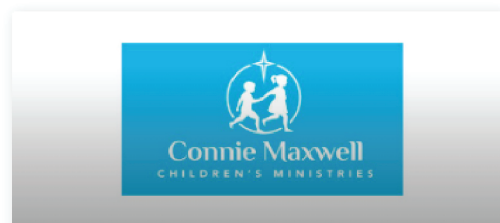
Thornwell

Thornwell began licensing foster families in 2017 and serves all types of families. Thornwell serves Anderson, Greenville, Laurens, Spartanburg, Lexington, Sumter, Richland and Horry Counties. Thornwell only licenses non-therapeutic homes. The training hours required to become licensed are a total of 14 hours completed prior to licensing. 28 hours of recertification training hours are required within 24 months of licensure in order to maintain foster home license. Re-certification training/topics are at the discretion of the foster parent/family



Growing Homes SE

Growing Homes SE works with any individual or family who has a desire to serve children.



Connie Maxwell

Connie Maxwell Children's Ministries (CMCM) serves Christian families who want to foster. CMCM seeks to establish relationships with local churches where the foster parent attends to provide a framework for volunteer services that can support and encourage families during their foster care journey.

Foster Home Licensing Agencies in S.C.

Select the **region** and then **county** to display agencies in your area that can help you with the licensing process.

EXHIBIT G



Agreement with Doctrinal Statement *

As an evangelical Christian foster care agency, we believe foster parents are in a position of spiritual influence over the children in their homes. Therefore, we require that foster parents who partner with us be followers of Jesus Christ, be active in and accountable to a Christian church, and agree in belief and practice with our doctrinal statement (found below and on our website at <http://miraclehill.org/who-we-are/doctrinal-statement/>). Before proceeding, please read our doctrinal statement. If after reading our doctrinal statement you find that Miracle Hill Foster Care is not a good fit for you, please let us connect you with another agency that can meet your needs. -----Doctrinal Statement----- We believe: ---the Bible to be the only inspired, infallible, inerrant and authoritative Word of God. (2 Tim. 3:16; 2 Pet. 1:20-21) ---that there is one God, creator of heaven and earth, eternally existent in three distinctive persons: the Father, Son and Holy Spirit. (1 Tim. 2:5; Gen. 1:1; Mt. 3:16-17; Mt. 28:19; 2 Cor. 13:14; John 10:30) ---in the deity and humanity of Jesus Christ; that He was born of a virgin; that we are redeemed by His atoning death through His shed blood; that He bodily resurrected and ascended into heaven and that He will come again in power and great glory to judge the living and the dead. (Eph. 1:7-10; Acts 1:9-11; Mt. 1:23-25; 1 Cor 15:1-8; 2 Tim 4:1) ---in the value and dignity of all people created in God's image, but alienated from God and each other because of our sin and guilt and justly subject to God's wrath. (Gen. 1:26-27; Psalm 139:13; Mt. 22:37-39; Rom. 12:20-21; Gal. 6:10; Eph. 2:1-3; Rom. 5:12) ---that regeneration by the Holy Spirit by grace through faith is essential for the salvation of lost and sinful people. (Tit. 3:4-7; Eph. 2:8-9; 2 Cor. 6:2) ---in the forgiveness of sins, the resurrection of the body, and life everlasting solely through repentance and faith in Jesus Christ. (Col. 1:13-14; 1 Thess. 4:16-17; John 3:16) ---that the Holy Spirit unites all believers in the Lord Jesus Christ and that together they form one body – the church. (1 Cor. 12:12-13; 1 Cor. 12:27) ---God ordained the family as the foundational institution of human society. It is composed of persons related to one another by marriage, blood or adoption, and that God's design for marriage is the legal joining of one man and one woman in a life-long covenant relationship. (Gen. 1:26-28; Eph. 5:21-6:4; Mt. 19:4-6) ---God creates each person as either male or female, and these two distinct, complementary sexes, together reflect the image and nature of God. (Gen. 1:27; Gen. 2:18)

Yes, I have read and agree with Miracle Hill's doctrinal statement.

Name *

First



Last

Email *

Address *

Street Address

Address Line 2

City

State / Province / Region

ZIP / Postal Code

Phone *

Date of Birth *

mm/dd/yyyy

Yes, I would like to receive e-mail from Miracle Hill Ministries.



Marital Status *

Married

Spouse Name

[Empty input field for Spouse Name]

Spouse's Date of Birth

mm/dd/yyyy

Spouse's Email

[Empty input field for Spouse's Email]

Spouse's Phone

[Empty input field for Spouse's Phone]

How did you hear about Miracle Foster Care? *

[Empty input field for How did you hear about Miracle Foster Care?]

Why I want to be a foster parent (Check all that apply) *

- My children are older, or gone, and I want to have children around again.
- I would like for my child(ren) to have someone to play with.
- I would like to help a child do something good with his/her life.

- I need the money and I would rather work in my home.
- I think I am a good parent.
- I have no children and would like to try being a parent.
- I would really like to adopt a child, but the wait is so long.
- I know there are children who need homes, and I think I should help.
- I think I have good skills for working with children and would like to use them.
- My spouse really wants to get into foster parenting.

What age ranges of children are you are willing to foster? *

How many children are you willing to foster at the same time? *

Tell us any other reasons you would like to be a foster parent.

Miracle Hill Ministries is a non-denominational, Christian organization based upon a protestant statement of faith. All children entrusted to our care are to be cared for in an atmosphere that is conducive to spiritual growth, development, and moral direction.

Church you currently attend *



Please give a brief, personal testimony of your faith/salvation in Jesus Christ. If you are married, please include your spouse's testimony as well. *

Miracle Hill Mission Statement

Miracle Hill exists that homeless men, women and children receive food and shelter with compassion, hear the Good News of Jesus Christ and become productive members of society.

Terms and Conditions

I have read and agree to the requirements set forth by both the state of SC and Miracle Hill Ministries and located on the Foster Care page of MHM's website. To the best of my knowledge, all the information provided on this form is correct. I understand that Miracle Hill will use this information for preliminary screening, and at this time I am not committing to becoming a foster parent, but rather indicating an interest, and I will be contacted for further discussion.

Accept Terms? *

I accept the Terms & Conditions.

Submit



Miracle Hill
MINISTRIES

490 S. Pleasantburg Drive
Greenville, SC 29607

864.268.4357

Privacy Policy

QUICK LINKS

Contact Us

Media Resources

News Coverage

Financial Accountability

Employment

Internship Program

Shop Merchandise

KEEP UP WITH US

Sign Up For Our Newsletter



AFFILIATIONS



Greenville Chamber
INVESTOR 2022

© 2022 Miracle Hill Ministries. Miracle Hill Ministries. Miracle Hill Ministries is a 501 (c)(3) nonprofit



organization. | Finely Tuned  by Engenius

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

EDEN ROGERS and
BRANDY WELCH,

Plaintiffs,

-against-

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;

ALEX AZAR, in his official capacity as
Secretary of the UNITED STATES
DEPARTMENT OF HEALTH AND HUMAN
SERVICES;

ADMINISTRATION FOR CHILDREN AND
FAMILIES;

LYNN JOHNSON, in her official capacity as
Assistant Secretary of the ADMINISTRATION
FOR CHILDREN AND FAMILIES;

SCOTT LEKAN, in his official capacity as
Principal Deputy Assistant Secretary of the
ADMINISTRATION FOR CHILDREN AND
FAMILIES;

HENRY MCMASTER, in his official capacity as
Governor of the STATE OF SOUTH
CAROLINA; and

MICHAEL LEACH, in his official capacity as
State Director of the SOUTH CAROLINA
DEPARTMENT OF SOCIAL SERVICES,

Defendants.

Case No. 6:19-cv-01567-JD

**DECLARATION OF DAVID
WOOD**

DECLARATION OF DAVID WOOD

I, David Wood, do declare as follows:

1. I make this declaration of my own personal knowledge; if called as a witness, I would be competent to testify to the contents hereof.

2. I am 40 years old and live in Greenville, South Carolina with my wife of sixteen years and our three children, a five-year-old daughter, an eleven-year-old son, and a fourteen-year-old daughter. I am employed as an information security engineer and my wife is a student and stay-at-home parent. Our children attend school in Greenville.

3. In 2015, my wife and I became foster parents through working with the child placing agency (“CPA”) Miracle Hill Ministries in Greenville and were licensed by the State of South Carolina Department of Social Services (“DSS”). At the time, I was a member of a church that aligned with Miracle Hill’s doctrinal statement. From 2015 to 2018 we fostered through Miracle Hill Ministries. Our first two foster children were able to reunify with their families. Our third foster child was four days old when she was placed in our home and, in 2018, we were thrilled to adopt her and have her join her siblings who are our biological children.

4. In 2021, we learned that someone close to us is a member of the lesbian, gay, bisexual, transgender, and queer (“LGBTQ”) community. This caused us to reevaluate our beliefs and join a different church that is inclusive of the LGBTQ community, First Baptist Church in Greenville.

5. I also became an active member of the Greenville chapter of PFLAG, a membership organization dedicated to uniting parents, families, and allies, with people who are LGBTQ, and often support families, advocate, and educate others.

6. After adopting our daughter, we decided to stop being foster parents. But as a former foster parent, I am aware of the huge need for foster families in South Carolina and so have continued to work on recruitment in my community and in my church. Because of my experience, I have tried to serve as a helpful liaison between people interested in fostering and South Carolina DSS as well as the various CPAs in the area.

7. Also, over the past year, I became aware of the specific need for foster homes for LGBTQ youth in foster care in South Carolina. Specifically, I was aware of a gay young man and a transgender young woman who were both in need of homes that would support and affirm them, but none were available.

8. A DSS regional director and two DSS staff members from another DSS region recently came to one of our PFLAG Greenville meetings actively soliciting families that will take LGBTQ youth in the system into their homes, so they do not have to be placed in group homes and other congregate care. They mentioned that many families are unwilling or not equipped to foster LGBTQ-identified youth, so it is difficult to find families to care for them. Other DSS officials I have communicated with, including DSS caseworkers from the Upstate DSS region where I live, have also mentioned this challenge.

9. I was aware of the lawsuit connected with Miracle Hill Ministries' policies around foster parent recruiting and screening and Governor Henry McMaster's Executive Order permitting CPAs to use faith-based criteria in deciding whether they would work with people seeking to become foster parents. I realized that in order to provide the most helpful information to members of my church, PFLAG members, and others in the community interested in becoming foster parents, I needed to have more information about which CPAs worked with all families, including same-sex couples and LGBTQ people.

10. I knew South Carolina Youth Advocate Program (“SCYAP”) had a nondiscrimination statement but for other CPAs, it was unclear from publicly available information which agencies work with everyone regardless of their sexual orientation, gender identity, or relationship status or with people of all faiths or no church or faith affiliation.

11. In January of 2022, I was in touch with Amber Peebles, the South Carolina DSS Foster Parent Liaison. I knew she was the person in the DSS state office to go to with general questions or concerns regarding the state child welfare system and foster parenting.

12. There were some changes around licensing requirements for foster parents or foster parent applicants with swimming pools and Amber had been assisting me with answers to questions around those new requirements. She was a very helpful resource.

13. After receiving answers from Amber about the swimming pool questions and still under the email subject line, “Re: Vaccine and Pool Updates,” I decided to ask her which agencies work with same-sex couples and LGBTQ individuals. On January 24, 2022, at 9:36 am, I sent a voice to text email to Amber saying, “I can’t remember if it was you I was talking to about this but also in the community there recently has come a need to understand which agencies are licensing LGBTQ families at this time. I know some are moving in that direction but not there yet and I know sound like Miracle Hill unfortunately or not. If you can send me a list that would be awesome. I think Thornwell and [E]pworth are. I know SCYAP/DSS was at one time but I’m not sure they are actively licensing new families at this time?”

14. On January 24, 2022, at 11:16 am, Amber replied with an email with a new subject line, “LGBTQ friendly Agencies,” and wrote, “See list below. Let me know if you still have questions. Epworth: Will work with married LGBTQ families but not cohabitating couples. The Licensing Partners who have no relational or identity restrictions are as follows: Growing Home Southeast, Lutheran Services Carolinas, New Foundations/Connections, Oasis of Hope, SC Mentor, SC Youth Advocate Program, Thornwell, Carolina Therapeutic Services, National Youth Advocate Program.”

15. I replied at 11:17 am writing, “You’re the bestest!” and Amber responded at 11:18 am, “Happy to help!” I did not have further correspondence with Amber on this topic until October 27, 2022, at 7:05 pm, when I wrote, “Hi, did Bair Foundation say anything about their LGBTQ stances/willingness to have LGBTQ foster parents (gay, trans, married LGBTQ, unmarried LGBTQ)? Do you have someone you could ask?” On October 28, 2022, at 9:32 am, Amber replied, “I will see what I can find out!” I have not received any additional information from Amber verbally or in writing. A true and accurate copy of my email exchanges with Amber is attached as **Exhibit 1** to this declaration.

16. In October 2022, I was invited by the University of South Carolina School of Law’s Court Improvement Project to provide a training to Guardians Ad Litem and Court Appointed Special Advocates about advocacy for LGBTQ youth in foster care in South Carolina. My co-presenter was Currey Cook from Lambda Legal, one of the counsel for the plaintiffs in this case, Eden Rogers and Brandy Welch. Currey and I were not able to speak to each other before the virtual presentation and I did not see his presentation as I had a work conflict. After the presentation Currey reached out to me to compare notes and share impressions about the training and next steps. During our discussion, I relayed the information I have outlined above. I did not share information about my interactions and

communications with DSS about CPAs that will work with LGBTQ people and same-sex couples during my presentation.

November 16, 2022

Respectfully submitted,

A handwritten signature in cursive script that reads "David C. Wood". The signature is written in black ink and is positioned above a horizontal line.

David Wood

EXHIBIT 1



David Wood [REDACTED]

LGBTQ friendly Agencies

7 messages

Peeples, Amber [REDACTED]
To: David Wood [REDACTED]

Mon, Jan 24, 2022 at 11:16 AM

See list below. Let me know if you still have questions.

Epworth: Will work with married LGBTQ families but not cohabitating couples

The Licensing Partners who have no relational or identity restrictions are as follows:

-
- Growing Home Southeast
- Lutheran Services Carolinas
- New Foundations/Connections
- Oasis of Hope
- SC Mentor
- SC Youth Advocate Program
- Thornwell
- Carolina Therapeutic Services
- National Youth Advocate Program

Amber Peeples

Statewide Foster Parent Liaison

SC Department of Social Services

P.O. Box 1520

[1535 Confederate Avenue](#)

[Columbia, South Carolina 29202](#)

[REDACTED]

[REDACTED]

www.dss.sc.gov



IMPORTANT: Please DO NOT use this e-mail address to report child or adult abuse or neglect. The statewide, 24/7 abuse/neglect hotline number for reporting is 1-888-CARE-4-US (1-888-227-3487). Non-emergency reports of abuse or neglect can be made via the SCDSS webpage at www.dss.sc.gov. For emergencies, please contact 911 or your local law enforcement office.

CONFIDENTIALITY NOTICE: This message and any attachments may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by reply e-mail and delete this message and any attachments.

From: David Wood [REDACTED]
Sent: Monday, January 24, 2022 9:37 AM
To: Peeples, Amber [REDACTED]
Subject: Re: Vaccine and Pool Updates

***** THIS IS AN EXTERNAL E-MAIL:** Use CAUTION when clicking on links as they could open malicious websites. *** (DLP2)

I can't remember if it was you I was talking to about this but also in the community there recently has come a need to understand which agencies are licensing LGBTQ families at this time. I know some are moving in that direction but not there yet and I know sound like Miracle Hill unfortunately or not. If you can send me a list that would be awesome. I think Thornwell and epworth are. I know SCYAP/DSS was at one time but I'm not sure they are actively licensing new families at this time?

David

On Mon, Jan 24, 2022 at 9:30 AM Peeples, Amber [REDACTED] wrote:

Good Morning David,

Hope you are doing well. I have attached updated guidelines from DSS. Let me know if there is something else I needed to send you.

Thanks for all you do!

Amber Peeples

Statewide Foster Parent Liaison

SC Department of Social Services

P.O. Box 1520

1535 Confederate Avenue

Columbia, South Carolina 29202

[REDACTED]

[REDACTED]

[REDACTED]

www.dss.sc.gov



IMPORTANT: Please DO NOT use this e-mail address to report child or adult abuse or neglect. The statewide, 24/7 abuse/neglect hotline number for reporting is 1-888-CARE-4-US (1-888-227-3487). Non-emergency reports of abuse or neglect can be made via the SCDSS webpage at www.dss.sc.gov. For emergencies, please contact 911 or your local law enforcement office.

CONFIDENTIALITY NOTICE: This message and any attachments may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by reply e-mail and delete this message and any attachments.

--

David Wood

Pronouns: he, him, his (why this matters)

David Wood [REDACTED]
To: "Peeples, Amber" [REDACTED]

Mon, Jan 24, 2022 at 11:17 AM

You're the bestest!

On Mon, Jan 24, 2022 at 11:16 AM Peeples, Amber [REDACTED] wrote:

See list below. Let me know if you still have questions.

Epworth: Will work with married LGBTQ families but not cohabitating couples

The Licensing Partners who have no relational or identity restrictions are as follows:

-

Growing Home Southeast

Lutheran Services Carolinas

New Foundations/Connections

Oasis of Hope

SC Mentor

SC Youth Advocate Program

Thornwell

Carolina Therapeutic Services

National Youth Advocate Program

Amber Peeples

Statewide Foster Parent Liaison

SC Department of Social Services

P.O. Box 1520

1535 Confederate Avenue

Columbia, South Carolina 29202

[REDACTED]

[REDACTED]

[REDACTED]

www.dss.sc.gov



IMPORTANT: Please DO NOT use this e-mail address to report child or adult abuse or neglect. The statewide, 24/7 abuse/neglect hotline number for reporting is 1-888-CARE-4-US (1-888-227-3487). Non-emergency reports of abuse or neglect can be made via the SCDSS webpage at www.dss.sc.gov. For emergencies, please contact 911 or your local law enforcement office.

CONFIDENTIALITY NOTICE: This message and any attachments may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by reply e-mail and delete this message and any attachments.

From: David Wood [REDACTED]
Sent: Monday, January 24, 2022 9:37 AM
To: Peeples, Amber [REDACTED]
Subject: Re: Vaccine and Pool Updates

***** THIS IS AN EXTERNAL E-MAIL:** Use CAUTION when clicking on links as they could open malicious websites. *** (DLP2)

I can't remember if it was you I was talking to about this but also in the community there recently has come a need to understand which agencies are licensing LGBTQ families at this time. I know some are moving in that direction but not there yet and I know sound like Miracle Hill unfortunately or not. If you can send me a list that would be awesome. I think Thornwell and epworth are. I know SCYAP/DSS was at one time but I'm not sure they are actively licensing new families at this time?

David

On Mon, Jan 24, 2022 at 9:30 AM Peeples, Amber [REDACTED] wrote:

Good Morning David,

Hope you are doing well. I have attached updated guidelines from DSS. Let me know if there is something else I needed to send you.

Thanks for all you do!

Amber Peeples

Statewide Foster Parent Liaison

SC Department of Social Services

P.O. Box 1520

1535 Confederate Avenue
Columbia, South Carolina 29202

[REDACTED]
[REDACTED]
[REDACTED]

www.dss.sc.gov



IMPORTANT: Please DO NOT use this e-mail address to report child or adult abuse or neglect. The statewide, 24/7 abuse/neglect hotline number for reporting is 1-888-CARE-4-US (1-888-227-3487). Non-emergency reports of abuse or neglect can be made via the SCDSS webpage at www.dss.sc.gov. For emergencies, please contact 911 or your local law enforcement office.

CONFIDENTIALITY NOTICE: This message and any attachments may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by reply e-mail and delete this message and any attachments.

--

David Wood

Pronouns: he, him, his (why this matters)

Peoples, Amber [REDACTED]
To: David Wood [REDACTED]

Mon, Jan 24, 2022 at 11:18 AM

Happy to help!

Amber Peoples

Statewide Foster Parent Liaison

SC Department of Social Services

P.O. Box 1520

1535 Confederate Avenue

Columbia, South Carolina 29202

[REDACTED]

[REDACTED]

[REDACTED]

www.dss.sc.gov



IMPORTANT: Please DO NOT use this e-mail address to report child or adult abuse or neglect. The statewide, 24/7 abuse/neglect hotline number for reporting is 1-888-CARE-4-US (1-888-227-3487). Non-emergency reports of abuse or neglect can be made via the SCDSS webpage at www.dss.sc.gov. For emergencies, please contact 911 or your local law enforcement office.

CONFIDENTIALITY NOTICE: This message and any attachments may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by reply e-mail and delete this message and any attachments.

From: David Wood [REDACTED]
Sent: Monday, January 24, 2022 11:17 AM
To: Peeples, Amber [REDACTED]
Subject: Re: LGBTQ friendly Agencies

***** THIS IS AN EXTERNAL E-MAIL:** Use CAUTION when clicking on links as they could open malicious websites. *** (DLP2)

You're the bestest!

On Mon, Jan 24, 2022 at 11:16 AM Peeples, Amber [REDACTED] wrote:

See list below. Let me know if you still have questions.

Epworth: Will work with married LGBTQ families but not cohabitating couples

The Licensing Partners who have no relational or identity restrictions are as follows:

Growing Home Southeast

Lutheran Services Carolinas

New Foundations/Connections

Oasis of Hope

SC Mentor

SC Youth Advocate Program

Thornwell

Carolina Therapeutic Services

National Youth Advocate Program

Amber Peeples

Statewide Foster Parent Liaison

SC Department of Social Services

P.O. Box 1520

1535 Confederate Avenue

Columbia, South Carolina 29202

[REDACTED]

[REDACTED]

[REDACTED]

www.dss.sc.gov



IMPORTANT: Please DO NOT use this e-mail address to report child or adult abuse or neglect. The statewide, 24/7 abuse/neglect hotline number for reporting is 1-888-CARE-4-US (1-888-227-3487). Non-emergency reports of abuse or neglect can be made via the SCDSS webpage at www.dss.sc.gov. For emergencies, please contact 911 or your local law enforcement office.

CONFIDENTIALITY NOTICE: This message and any attachments may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by reply e-mail and delete this message and any attachments.

From: David Wood [REDACTED]
Sent: Monday, January 24, 2022 9:37 AM
To: Peeples, Amber [REDACTED]
Subject: Re: Vaccine and Pool Updates

***** THIS IS AN EXTERNAL E-MAIL:** Use CAUTION when clicking on links as they could open malicious websites. *** (DLP2)

I can't remember if it was you I was talking to about this but also in the community there recently has come a need to understand which agencies are licensing LGBTQ families at this time. I know some are moving in that direction but not there yet and I know sound like Miracle Hill unfortunately or not. If you can send me a list that would be awesome. I think Thornwell and epworth are. I know SCYAP/DSS was at one time but I'm not sure they are actively licensing new families at this time?

David

On Mon, Jan 24, 2022 at 9:30 AM Peeples, Amber [REDACTED] wrote:

Good Morning David,

Hope you are doing well. I have attached updated guidelines from DSS. Let me know if there is something else I needed to send you.

Thanks for all you do!

Amber Peeples

Statewide Foster Parent Liaison

SC Department of Social Services

P.O. Box 1520

1535 Confederate Avenue

Columbia, South Carolina 29202

[REDACTED]

[REDACTED]

[REDACTED]

www.dss.sc.gov



IMPORTANT: Please DO NOT use this e-mail address to report child or adult abuse or neglect. The statewide, 24/7 abuse/neglect hotline number for reporting is 1-888-CARE-4-US (1-888-227-3487). Non-emergency reports of abuse or neglect can be made via the SCDSS webpage at www.dss.sc.gov. For emergencies, please contact 911 or your local law enforcement office.

CONFIDENTIALITY NOTICE: This message and any attachments may contain information that is protected from disclosure by federal and/or state law, or is otherwise privileged or confidential. This communication is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering this message to the recipient, you are hereby notified that any dissemination, distribution, or copying of this message is strictly prohibited and violations of applicable federal and/or state law may subject you to civil and/or criminal penalties. If you have received this message in error, please notify the sender immediately by reply e-mail and delete this message and any attachments.

--

David Wood

Pronouns: he, him, his (why this matters)

David Wood [redacted]
To: "Peeples, Amber" [redacted]

Thu, Oct 27, 2022 at 7:05 PM

Hi, did Bair Foundation say anything about their LGBTQ stances/willingness to have LGBTQ foster parents (gay, trans, married LGBTQ, unmarried LGBTQ)? Do you have someone you could ask?

Thanks,
David

On Mon, Jan 24, 2022 at 11:16 AM Peeples, Amber [redacted] wrote:

See list below. Let me know if you still have questions.

Epworth: Will work with married LGBTQ families but not cohabitating couples

The Licensing Partners who have no relational or identity restrictions are as follows:

-
- Growing Home Southeast
- Lutheran Services Carolinas
- New Foundations/Connections