

Here are the twelve plaintiff children's stories:

**Jonathan R.** is a 15-year-old boy and has spent the last seven years in DHHR care. After being sexually, physically, and emotionally abused by his birth parents, Jonathan was adopted by a family friend. After being adopted, Jonathan was abused by his adopted parents but DHHR repeatedly failed to open an investigation. He later became suicidal and was institutionalized. He was eventually moved to an out-of-state facility in Georgia which didn't provide him appropriate services. Through the years, he was moved several more times. With proper planning and services, Jonathan's risk of harm could be significantly reduced but instead, the state has only continued to contribute to his trauma.

**Calvin, Chris, and Caroline K.** are ages 4, 3 and 2 years old, respectively and entered DHHR care when Calvin was 14 months old and Chris and Caroline were just born. They experienced trauma and neglect from their birth parents, who were addicted to drugs before the children entered care. Upon entering DHHR care, they were placed together with a family who expressed interest in adoption. Unfortunately, DHHR delayed the process and the adoption did not take place. They were then moved to another foster family but were removed shortly after from claims the children were in "imminent danger"; later, the court ruled that this claim by DHHR was unfounded. The three siblings are in yet another foster home, thus experiencing multiple placements due to DHHR's inability to appropriately develop case plans and to follow department procedures.

**Theo S.** is a 7-year-old boy and entered DHHR care after multiple investigations into physical abuse within his home. He was born addicted to opioids and experienced withdrawal symptoms, yet DHHR still did not remove him from his home. Finally, after several years of more abuse, Theo entered foster care and was shuffled amongst approximately 12 placements. Now, this young boy is living in an out-of-state segregated institution, located over five hours from his home.

**Serena S.** is an 11-year-old girl who has Down syndrome. She is verbal but dependent on others to perform daily activities such as maintaining basic hygiene. Serena's birth parents stopped sending Serena to school and eventually were sentenced to jail time due to educational abuse. Serena and her siblings were taken into care. Serena was eventually separated from her siblings and put in several placements that couldn't handle her special needs. DHHR has not put forth any known effort to find Serena a pre-adoptive home, or engaged in reasonable case planning and placement matching throughout Serena's time in care.

**Anastasia M.** is an 11-year-old girl who has been in foster care twice. She was shuffled through seven different placements including four foster homes and three respite care placements. In one facility, Anastasia slept on a mattress on a cement floor in a single-room cell. She told advocates repeatedly, "I don't think I need help, I need love". Anastasia is exceptionally bright and has an IQ of 130. As a result of her early childhood trauma and subsequent traumas related to her multiple placement disruptions, Anastasia suffers from the symptoms of attention-deficit/hyperactivity disorder, reactive attachment disorder, and other psychological issues.

**Ace L.** is a 12-year-old-boy and has been in the care and custody of DHHR since 2016. Before entering care, Ace was sexually and physically abused by his stepfather. Stemming from his abuse, he was diagnosed with encopresis, which causes him to have occasional accidents. His previous foster family physically abused him due to these accidents, and the abuse was reported to DHHR but not investigated. Ace has been tormented by his medical diagnosis in other foster families, in every group home, and throughout his education. DHHR is aware of the challenges that Ace's previous trauma has had on him, but has not provided therapeutic services to support him and has intensified his problems.

**Karter W.** is a 13-year-old boy who has been in foster care for over three years and has only had one community-based foster home placement. DHHR has otherwise bounced Karter between numerous temporary shelters, residential facilities, hospitals, and, now, an out-of-state institution. At one point, Karter has been prescribed 32 pills a day to try to control his behavior. DHHR even prevented him from speaking with his dying grandfather.

**Gretchen C.** is a 15-year-old girl who has been in foster care for over five years. During Gretchen's time in foster care, she has lived in temporary shelters, four group homes, and a large out-of-state institution, where she currently resides. Gretchen has repeatedly asked for individual therapy, but DHHR has ignored her requests, instead leaving her in a facility that engages in peer shaming and requires children to reap undeveloped land with a primitive farming tool called a scythe.

**Dennis C.** is 16 years old and has been in the custody of DHHR since he was 11. As a likely result of shaken baby syndrome, Dennis was diagnosed with cerebral palsy. Even with multiple reports to DHHR regarding the possibility of physical abuse for years, DHHR only removed Dennis from his abusive parents when he was 11 years old. He has been in five foster home placements and requires a therapeutic foster home but DHHR has never provided him with one. Dennis is smart but has been placed in a facility geared for low-functioning, severely disabled children, and has not been taught to read or write. The facility also has had reports of physical and sexual abuse. DHHR has not provided him with the services or appropriate placements that he needs, and which would have alleviated the consequences of many of the traumas that Dennis currently must deal with daily.

**Garrett M.** Is a 17-year-old boy who has been in DHHR care since 2012. Before entering care, Garrett was physically abused by his family, including being tied up and struck with a belt. He has been in group homes, residential care centers, and currently resides in a juvenile detention center. At the detention center, he sleeps on a mattress on a cement floor in a locked cell. He is deeply depressed and has made several suicide attempts, including when a staff member found him slowly suffocating after a failed attempt to hang himself with a noose made from his belt. He ages out of the system within the year and will be homeless since he has no family and does not trust DHHR.