

1 [Your Name]
[Your Address]
2 [Your City and State, Zip]
[Your Phone Number]
3 [Your Relation to the Child(ren)]
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF [YOUR COUNTY]
10 [Address of Juvenile Court, City, State Zip]
11

12 **IN RE: [Name of Child(ren)]**

13
14
15 **and**

16
17 **[Department]**
18
19

APPLICATION NO.: REMOVAL ORDER

CASE NO.: _____

20
21 **NOTICE**
22

23 I, [Your Name], am the [Natural Mother/Father or Guardian/Adoptive Parent] of the
24 child(ren) referenced above, reserve the right to petition for rehearing of any findings,
25 recommendations, authorizations and/or orders made by a referee or commissioner in this case
26 pursuant to Welfare & Institutions Code § 252 . I hereby reserve this right, without further notice
27 to the Department or any other party, until the resolution and/or dismissal of any issue pertaining
28 to the children referenced above.

1 I further provide notice herein, that my failure or omission to object to additional acts of
2 perjury and/or evidence fabrication contained in the Application and Declaration for the
3 authorization to enter my home and detain my children along with attached Statement and Causes,
4 in no way constitutes a stipulation of acceptance of such acts and/or statements. I hereby
5 expressly imply that any such failure(s) to object to perjury contained therein is implicitly and
6 directly due to ineffective assistance of counsel and does so reflect on the professional and
7 personal integrity of such counsel of record.

8
9 **OBJECTIONS, STATEMENTS OF FACT AND RESPONSE OF [YOUR NAME]**
10 **TO THE DEPARTMENT'S APPLICATION AND DECLARATION IN SUPPORT OF**
11 **AUTHORIZATION FOR REMOVAL AND STATEMENT OF CAUSES**

12 *From here down replace Adoptive Parent, Guardian with your relation to the child(ren). Also replace children with*
13 *child of you only have one child in the case. Replace names of social workers with the workers in your case. You may*
14 *find a lot of this is not applicable as every case is different. I provide this example so you can get a feel of the format,*
15 *language and things to look for in your documentation and your own evidence and testimony. Please note that I have*
16 *no idea if this kind of filing will do you any good whatsoever. However, if you manage to get it on the record (the*
17 *court accepting it (the "Judge" has to actually say he accepts it into the record) the appellate attorney may have*
18 *something to work with. Be sure to find where the Court made mistakes or accepted perjury as truth. **The author of*
19 *this document is not an attorney and therefore before filing this document please have an independent attorney review*
20 *its contents, not your court appointed attorney. You can still file it without doing that but you accept sole*
21 *responsibility.*** Delete this entire paragraph.*

22 I, Your Name, am the Adoptive Parent of [Name of Child], [Name of Child], and the
23 legal Guardian of [Name of Child], [Name of Child]. I herein raise the following objections,
24 and state relevant facts in response to certain issues and statements¹ made by social worker,
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26

27
28 ¹ Rush's Statement of Causes fails to properly number the pages and fails to number the paragraphs
therefore, referencing locations of specific words, phrases and/or sentences is not possible.

1 CSW ² Ramaul Rush (“Rush”), on behalf of the Department of Children and Family Services
2 (“the Department”), contained in the Application and Declaration (“Application”) including
3 the Statement of Causes, (“Statement’) prepared by social worker, Rush on September 18,
4 2014 and filed by the Department on September 22, 2014. These documents and statements
5 are based on perjury and false and/or misleading information. These documents were filed to
6 request that the Court authorize the removal, authorize entry into my residence to investigate
7 allegations of child abuse and authorize the Department to remove and detain my children yet
8 the evidence provided lacks foundation, lacks direct, real and/or demonstrative evidence to
9 support its claims that

10 *“the child (ren) is/are in danger of physical or sexual abuse and there are no*
11 *reasonable means by which the child (ren) can be protected without temporary removal*
12 *from the physical custody of the parents or guardians.”*

13 and

14 *“The child (ren)’s physical environment poses a threat to the child (ren)’s*
15 *health or safety and there are no reasonable means by which the child (ren) can be*
16 *protected without temporary removal from the physical custody of the parents or*
17 *guardians.”*

18 I make the following arguments and points:

19 **POINT 1, FALSE STATEMENT:** On July 7, 2014 an alleged referral was made to the
20 Department regarding the children in my care. It was alleged that I sexually abused [Name of
21 Child] during the time she was placed in my home by Riverside County DPSS, commencing in
22 the month of May 2012 through July 11, 2012. Rush falsely stated that “placement ended in
23 2013.” Documentation from the County of Riverside substantiates that [Name of Child] was
24 indeed removed in 2012.

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26
27 ² Rush is not an licensed social worker despite his twenty (20) years working for DCFS and his claim to
28 have a Master’s Degree in Sociology. Never in those twenty years has he ever even applied for a
license with the State of California or any other state.

1 **POINT 2, PERJURY:** Point 1 is incorporated herein by reference. Rush has lied to
2 the Court, claiming that I have been “uncooperative.” When a child (ren) is in a place of
3 imminent danger of being abused, it is in the best interests of the child (ren) for social services
4 to act immediately. The same allegations have been raised repeatedly since July 2012 and as a
5 result, several investigations were conducted by both Riverside and Los Angeles Counties.
6 The disposition of each and every one was unfounded. [*See Exhibit “A”*]. On or about July 7,
7 2014, Rush attempted to contact my family at our residence however, we were not home.
8 According to my neighbors, Rush began to canvas the neighborhood, leaving business cards on
9 several of my neighbors’ front doors. This caused me some embarrassment and I feel it was
10 unreasonable to question my neighbors prior to speaking with this family. Rush did not return
11 for nine (9) days. When he did return on July 18, 22014, he again canvassed the neighborhood,
12 leaving more business cards on my neighbors’ front doors prior to observing my wife outside
13 on the front lawn. Upon noticing my wife speaking to a poorly groomed man who behaved as I
14 would see a local transient behaving, I immediately approached this man and for the protection
15 and safety of my wife, I advised to her go inside the house. Rush then adherently told me that
16 he worked for the Department and asked to see the children. Still wary of this man, as I did not
17 get a good feeling at all from him, I told Rush that if he wanted to see the children that he
18 would have to call me from his office phone and make an appointment. Rush threatened to
19 initiate a search warrant but vacated the property. The next day I called to verify that Rush was
20 indeed an employee of the Department and to obtain his email address to which I sent a
21 courteous correspondence suggesting a time for an interview. We set this appointment for July
22 29, 2014.

21 **POINT 4, FALSE STATEMENTS AND PERJURY:** Rush states that in his course
22 of work he reviewed by background child abuse history and criminal history and “revealed” a
23 referral which he dates to be 10/03/2012. Rush fails to state or indicate what county this
24 alleged referral originated from nor does it state whether or not there was any investigation
25 from these statements from some unknown “Reporting Party”. This alleged referral appears to
26 be regarding [Name of Child], my niece who was placed with me in May 2012. This alleged
27 referral implies that she and her brother were removed from my care because I was in a “high-
28 speed police pursuit while having [Name of Child] and her little brother in the car with him.”
It also states that I “hit her with a belt all of the time.” These statements are untrue. Rush

1 purposely mislead the Court by using this to support the Application. At the time Rush
2 prepared his Statement, he was well aware that this was a Riverside DPSS dependency case,
3 not involving me as a parent or guardian, and the Riverside Department of Social Services is
4 moving to terminate parental rights of the natural parents as they have placed [Name of Child]
5 and her brother in a pre-adoptive home. I object to these statements on the grounds that they
6 are hearsay. Additionally, the information provided in the Statement does not indicate that
7 there was ever an investigation, it simply states that the disposition as “No Disposition.”

8 **POINT 5, ALLEGATIONS LACKING FOUNDATION:** Also included in Rush’s
9 Statement is an alleged referral of 01/03/2013 also involving [Name of Child]. This alleged
10 referral was received thirty-six (36) days after the caller had alleged knowledge of the
11 allegations from the child as Rush states, “Caller states on 11/29/12...” and that “Riverside and
12 the local police did a forensic sexual abuse interview to the minor but minor denied any sexual
13 abuse.” The referral appears to be from [Name of Child] therapist who claimed that [Name of
14 Child] “continues having nightmares where her mother is hidden in the closet and the caller
15 feels that this might be an indication that the minor had been sexually abuse.” Neither I, nor
16 my wife, are [Name of Child]’s mother. Whatever may or may not have happened to [Name of
17 Child] prior to being placed in my care is not associated with me in any way. I further allege
18 that any nightmares that [Name of Child] may or may not be having, in the best interests of the
19 child, should be carefully considered as to possible sexual abuse that she is experiencing in her
20 CURRENT placement. Rush notes that the disposition of this referral as “evaluated-out”
21 which the Department defines as: *determined ineligible for a social worker visit*. Later in the
22 Statement, Rush details outrageous events that [Name of Child] allegedly endured. Not only
23 are such things completely untrue but whomever is making these types of allegations up is a
24 very sick person. It disturbs me greatly to have any such images of precious [Name of Child]
25 in my head and the author should be ashamed to have written it. Moreover, such detailed
26 allegations are in direct conflict with the previous statement regarding the forensic sexual abuse
27 interview that Riverside County asserted due to the referral that stated, “...the minor denied
28 any sexual abuse.” Rush has purposely mislead the Court with false statements and lies.

29 **POINT 6:** Points 1-2 are incorporated herein by reference. Between July 18 and July
30 29, Rush and I corresponded via email. [See Exhibit “B”] This is when I explained to him that
31 the allegations of sexual abuse had already been investigated and deemed unfounded and

1 provided him with contact information to verify this. I object to the unreasonableness of
2 wanting to re-investigate allegations already deemed unfounded.

3 **POINT 7:** Points 1, 2 and 6 are incorporated herein by reference. Rush interviewed
4 the children on July 29 who gave no indication that they were abused in any way and his visual
5 assessment proves no obvious neglect. I allowed Rush to interview the children outside and
6 refused him entry into my home. Rush never mentioned wanting to interview my son, [Name
7 of Child], as he specifically named the other three children. I simply did not question his
8 intentions. Rush's Statement fails to include the constant email contact and telephone contact
9 between us, misrepresenting the events as to appear that I was simply uncooperative. [*See*
10 *Exhibit "C"*]

11 **POINT 8:** Points 1, 2, 6 and 7 are incorporated herein by reference. On or about
12 August 25, 2014 I received a letter from Riverside Department of Social Services who advised
13 me that the referral they received on July 3, 2014, containing the same allegations as this
14 Department received on July 7, 2014, had been investigated and deemed unfounded. At this
15 point I believed that they would forward their disposition to this Department. I also believed
16 that the pressure Rush was placing on me to assess my home would be relieved and my only
17 obligation was to social worker, Maryam Hakimzadeh, who needed to assess my home
18 according to policy for receiving the cash aid as a foster home. I was unaware of any ongoing
19 investigation as to the allegations that I sexually abused [Name of Child] in 2012. Ms.
20 Hakimzadeh and I communicated regularly regarding the issue of home assessment from July
21 30 through August 20, 2014. [*See Exhibit "D"*]

22 **POINT 9:** Points 1, 2, 6, 7 and 8 are incorporated herein by reference. On September
23 5, 2014, Rush filed a request to the Court to issue a Search Warrant and Protective Services
24 Warrant. On September 9, 2014, four (4) days later, Rush and several LAPD officers came to
25 my door claiming they had a search warrant however, the only documentation that they could
26 provide me was merely Rush's request, not an order from the Court. Emails dated September
27 16 and September 18 to both the Department and LAPD Officer Mike Snowden demanded that
28 I be provided with a valid court order. Neither the Department nor LAPD could provide one.
[*See Exhibit "E"*].

POINT 10: Points 1, 2, 6, 7, 8 and 9 are incorporated herein by reference. After
illegally searching my home, the social worker went to the children's school and interviewed

1 them without my consent and without a valid order of the Court. Rush spoke with [Name of
2 Child], and [Name of Child]. The children reported that they were neither abused nor
3 neglected in any way and that they showed no visible signs of abuse or neglect. It is my belief
4 that it was at this time that Rush falsified statements and alleged that the school had concerns
5 regarding my daughter, [Name of Child], having pain in her private area. Several weeks prior,
6 the school nurse had advised me that [Name of Child] was having to use the restroom several
7 times a day due to a diarrhea/constipation issues which I tried over-the-counter remedies and
8 when the problem persisted, I took her to see a doctor. [Name of Child] was assessed. Lab
9 specimens were obtained and it was determined that [Name of Child] could return to school. I
10 was to pick up the lab results a few days later. [See Exhibit "F"].

11 **CONCLUSION:** Rush continually states allegations of sexual abuse of the child,
12 [Name of Child], despite countless dispositions that the allegation two years prior were deemed
13 by two counties and LAPD Officer Lisa T. Minohara-Ramirez, as unfounded. [See Exhibit
14 "G"]. Rush purports that the child, [Name of Child], presented with an abnormal urinary
15 pattern is preposterous. Based on the evidence Rush attaches to his Statement, there is nothing
16 to support such an opinion. This is evidence that Rush's intentions are malicious in nature
17 causing unnecessary harm to me, my wife and my children. Rush makes presumptions based
18 on unfounded allegations therefore, the basis for the Application has no merit whatsoever. The
19 fact that these allegations are being used against me as to deem that the children were in
20 imminent danger seventy-seven (77) days after receiving old unfounded allegations evidences
21 unreasonableness on the part of a children's social services worker with over twenty (20) years
22 experience and either, A.) Failed to act within a reasonable period of time or; B.) Believed
23 that the children were in no danger whatsoever.

24 I declare, under penalty of perjury that the foregoing is true and correct, to the best of
25 my belief and knowledge.

26 _____
[Your Name, Relation to the Child(ren)]

27 _____
Date

28 *****BEST TO SIGN IN THE PRESENCE OF A NOTARY*****

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LIST OF EXHIBITS

A – Unfounded investigation letters

B – Emails between [Your Name] and Ramaul Rush from July 18-July 22, 2014

C - Emails between [Your Name] and Ramaul Rush from August 4 – August 26, 2014

D - Emails between [Your Name] and Maryam Hakimzadeh from July 30 – August 20, 2014

E - Email letter to several recipients on September 16, 2014 demanding a valid order of the Court granting Search Warrant filed on 9/5/14

F - Medical documents authorizing return to school for [Name of Child]

G – Email from LAPD Officer, Lisa T. Minohara-Ramirez stating the results of her investigation