

TJS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Lynne Clayton and Kirt W. Clayton and
Barbara E. Clayton, as Parent and Grand
Parents and Natural Guardians of Marc
Anthony Clayton, a Minor, in their own right,

Philadelphia PA 19145

Plaintiffs Pro Se

v.

Children's Choice, Inc.
Drs. Bill & Carolyn Eberwein
Scot Plaza Two, Suite 325
Philadelphia, PA 19113
*In their individual and joint capacity as a privately
owned Pennsylvania company having annual
sales \$12,903,467.00*

Defendant

and

Honorable Kevin Dougherty
Administrative Judge, Family Division
1801 Vine Street - Suite 314
Philadelphia, PA 19103
*In his individual capacity and as a culpable
accessory to Fraud, Illegal Adoption and
Kidnapping due to administrative negligence
in DHS #0286930A; DP #D34440612; J #3906701*

Defendant

and

Honorable Margaret T. Murphy
Supervising Judge
34 S. 11th Street - Room 209
Philadelphia, PA 19107
*In her individual capacity and as a culpable
accessory to Fraud, Illegal Adoption and
Kidnapping due to administrative negligence
in DHS #0286930A; DP #D34440612; J #3906701*

Defendant

and

Marian Yongu
Human Services Program Administrator
Department of Human Services (DHS)
1515 Arch Street, Philadelphia, PA 19102
*In his/her individual capacity and as a culpable
accessory to Fraud, Illegal Adoption and
Kidnapping due to administrative negligence
in DHS #0286930A; DP #D34440612; J #3906701*

Defendant

CIVIL ACTION No. **09 4895**

1. PETITION IN FORMA PAUPERIS

2. COMPLAINT

NATURE OF CASE:

**ILLEGAL ADOPTION
HUMAN TRAFFICKING
FINANCIAL INCENTIVE
KIDNAPPING
CIVIL RIGHTS VIOLATIONS**

**CERTAIN Court of Common Pleas
FAMILY COURT, PHILADELPHIA
DEPARTMENT OF HUMAN
SERVICES, DHS AND ADOPTION
AGENCY EMPLOYEES HAVE
REPEATEDLY VIOLATED
PLAINTIFFS' CIVIL RIGHTS AND
THEIR EMPLOYERS' POLICIES
AND MISSION STATEMENTS TO
KIDNAP A LOVED WANTED CHILD,
FOUR (4) YEAR OLD MARC
ANTHONY CLAYTON AND
COMMIT ILLEGAL ADOPTION
CRIME ON 10/13/2009 FOR
FINANCIAL INCENTIVES (FRAUD).**

JURY TRIAL DEMANDED

DAMAGES: \$100,000.00

RELIEF PRAYED FOR:

**NULLIFY ILLEGAL ADOPTION
SCHEDULED 10/13/09 and return
Corrupt Philadelphia Family Court
Kidnapped for Profit Victim, Four
(4) Years Old DHS Victim Plaintiff
Marc Anthony Clayton to Protective
Plaintiffs Mother and Grandparents.**



STANDARD

**United States District Court
Eastern District of Pennsylvania (Philadelphia)
CIVIL DOCKET FOR CASE #: 2:09-cv-04695-TJS**

CLAYTON et al v. CHILDREN'S CHOICE, INC. et al
Assigned to: HONORABLE TIMOTHY J. SAVAGE
Cause: 42:1981 Civil Rights

Date Filed: 10/13/2009
Jury Demand: None
Nature of Suit: 440 Civil Rights: Other
Jurisdiction: Federal Question

Plaintiff

LYNNE CLAYTON

represented by

LYNNE CLAYTON

PHILADELPHIA, PA 19145
PRO SE

Plaintiff

KIRT W. CLAYTON

represented by

KIRT W. CLAYTON

PRO SE

Plaintiff

BARBARA E. CLAYTON

*as Parent and Grand Parents and Natural
Guardians of Marc Anthony Clayton, a
Minor, in their own right*

represented by

BARBARA E. CLAYTON

PRO SE

V.

Defendant

CHILDREN'S CHOICE, INC.

Defendant

DR. BILL EBERWEIN

Defendant

DR. CAROLYN EBERWEIN

*In their individual and joint capacity as a
privately owned Pennsylvania company
having annual sales \$12,903,467.00*

Defendant

HONORABLE KEVIN DOUGHERTY

*In his individual capacity and as a
culpable accessory to Fraud, Illegal
Adoption and Kidnapping due to
administrative negligence in DHS
#0286930A; DP #D34440612; J #3906701*

Defendant

HONORABLE MARGARET T. MURPHY

In her individual capacity and as a culpable accessory to Fraud, Illegal Adoption and Kidnapping due to administrative negligence in DHS #0286930A; DP #D34440612; J #3906701

Defendant

MARIAN YONGU

In his/her individual capacity and as a culpable accessory to Fraud, Illegal Adoption and Kidnapping due to administrative negligence in DHS #0286930A; DP #D34440612; J #3906701

Date Filed	#	Docket Text
10/13/2009	1	MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS filed by LYNNE CLAYTON, KIRT W. CLAYTON, BARBARA E. CLAYTON..(jeb,) (Entered: 10/14/2009)

PACER Service Center			
Transaction Receipt			
10/15/2009 03:17:20			
PACER Login:	rg3003	Client Code:	RGrinage
Description:	Docket Report	Search Criteria:	2:09-cv-04695-TJS
Billable Pages:	1	Cost:	0.08

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Marian Yongu

Human Services Program Administrator

Department of Human Services (DHS)

1515 Arch Street, Philadelphia, PA 19102

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KIDNAP A LOVED WANTED CHILD,
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Marc Anthony Clayton to Protective
Plaintiffs Mother and Grandparents.**

COMPLAINT

COMES NOW, in our own right, LYNNE CLAYTON, KIRT W. CLAYTON, BARBARA E. CLAYTON, as natural guardians and protective Parent and Grand Parents of four (4) year old minor, MARC ANTHONY CLAYTON, (hereafter referred to as “Clayton DHS Victim Family Plaintiffs”), in our own right and complain in this United States District Court Eastern District of Pennsylvania, to set right what is wrong (“redress”), and provide attached Exhibits A, B, C, and D to justify as fact the following averments:

1. Clayton DHS Victim Family Plaintiffs are in possession of voluminous tangible and community witness proofs which record twenty-five months endured repeated victimizations inflicted by Defendants, including civil rights violations which led to, illegal adoption, human trafficking and kidnapping for financial incentive; and fraud of Philadelphia, Pennsylvania, Department of Human Services Contracts Administration and U.S. Department of Treasury Internal Revenue Service. See Philadelphia City Paper, by Doron Taussig, Published: Dec 4, 2007, “Fighting to have their voices heard, local mothers unite and challenge DHS policies” attached hereto as **Exhibit A**.

2. Defendant, Children’s Choice, Inc. Foster Care and Adoption Agency (“Children’s Choice”) is a privately owned Pennsylvania company having annual sales of approximately \$12,903,467.00 and is owned by Drs. Bill & Carolyn Eberwein.

3. Defendant, Children’s Choice, is a Philadelphia Department of Human Services contract service provider who receives payment from Philadelphia Department of Human Services for foster care and adoption placements. See Phila.gov Department of Human Services official website and contract service provider list attached hereto as **Exhibit B**.

4. As a paid contract service provider, the owner’s of Children’s Choice, Inc., Drs. Bill & Carolyn Eberwein, have no way of knowing whether or not a child offered to their

company for placement by corrupt or negligent Family Court and DHS administrators has or has not been kidnapped for financial incentives.

5. Drs. Bill & Carolyn Eberwein, as owners of the privately owned Pennsylvania company, Children's Choice, receive payment for placement of any child offered by Philadelphia Department of Human Services and enjoy annual sales of approximately \$12,903,467.00, with no criminal liability for participating in the human trafficking for profit of a kidnapped child. See Children's Choice History, Children's Choice Mission Statement attached as **Exhibit C**.

6. Clayton DHS Victim Family Plaintiffs suffered repeated and prolonged civil rights violations inflicted by administrative negligence, incompetence or deliberate complicity of Defendants, Philadelphia Family Court Administrative Judge Kevin Dougherty and Supervising Judge, Margaret T. Murphy, including but not necessarily limited to Illegal Adoption, Kidnapping and Human Trafficking for financial incentive and fraud of Philadelphia Department of Human Services Contracts Administration.

7. Multiple civil rights violations over the period of twenty-five months have led to Philadelphia Family Court ordered kidnapping, human trafficking for financial incentive and illegal adoption scheduled 10/13/2009.

8. Capital crimes of kidnapping and human trafficking for financial gain were made possible by Defendant Administrative and Supervisor Family Court Judges' administrative negligence within and throughout file numbers, DHS #0286930A; DP #D34440612; J #3906701. Voluminous paper proofs span twenty-five months of documented repetitive civil rights violations promptly provided upon request of this Court. (In excess of 200 pages).

9. Defendant Marian Yongu, Human Services Program Administrator, Department of Human Services (DHS) has failed to perform the Office of Contract Administration duties description competently. Marian Youngu in his/her individual and professional capacity as Human Service Program Administrator is culpable for having played a negligent role in the

crimes suffered by Clayton DHS Victim Family Plaintiffs including but not necessarily limited to illegal adoption of a kidnapped child; fraud of funding sources of Philadelphia Department of Human Services; civil rights violations and human trafficking for financial incentive relative to the Family Court's negligent administration of files numbers DHS #0286930A; DP #D34440612; J #3906701. See Phila.gov official website Department of Human Services Contract Administration home page attached hereto as **Exhibit D**.

10. Employees of Children's Choice and Department of Human Services (DHS) Robin Steinman Program Coordinator; Renata Louis, Social Worker; and Latasha Vassor, Social Worker, violated their employers' official policies and mission statements such that employees share culpability for employee misconducts which led to kidnapping, human trafficking for profit, fraud and multiple civil rights violations crimes suffered by Clayton DHS Victim Family Plaintiffs within and throughout the Family Court and Department of Human Services negligent administration of file numbers, DHS #0286930A; DP #D34440612; J #3906701. See Children's Choice Core Values attached hereto as **Exhibit B**.

11. All captioned Defendants and social worker employees named in Paragraph 10 are criminally liable for defrauding Internal Revenue Service and other financial assistance for adopting families agencies and funding resources.

12. The Foster Care provider and financially incited foster provider, Eunice Crandall, 2615 Hancock Street, Philadelphia, Pennsylvania 19145 is in the business of foster care for profit and has financial incentive for illegally adopting kidnapped victim minor child even though she is aware child is kidnapped for financial gain by negligent administration of file numbers, DHS #0286930A; DP #D34440612; J #3906701; and lives in the same community as Clayton DHS Victim Family Plaintiffs.

13. Eunice Crandall recently adopted special needs child, has four other foster children in the house and is financially enticed to receive \$10,000 Internal Revenue Tax Credit for illegally adopting loved wanted kidnapped victim child, Marc Anthony Clayton.

14. Four (4) year old Clayton DHS Victim Family Plaintiff, Marc Anthony Clayton, has experienced several injuries while in the over crowded foster care of Eunice Crandall having been attacked and injured several times by the older special needs child recently adopted by Eunice Crandall. Photographs of the child's injuries are known to captioned Defendants and Children's Choice social worker employees who have scheduled illegal adoption for financial gain on 10/13/2009.

The federal government offers an adoption tax credit of \$10,000 to all adoptive families on qualifying expenses paid for a child's adoption. In addition to this some states offer an additional tax credit or income tax deduction for families that have adopted a child. For more information contact IRS at www.IRS.gov and look up publication # 968.

15. Constitutional Bill of Rights violations inflicted upon Clayton DHS Victim Family Plaintiffs during a period of at least twenty-five months, for which all captioned Defendants and Children's Choice and DHS employee social workers share culpability.

The Fifth Amendment provides that citizens not be subject to criminal prosecution and punishment without due process. Citizens may not be tried on the same set of facts twice, and are protected from self-incrimination (the right to remain silent). The amendment also establishes the power of eminent domain, ensuring that private property is not seized for public use without just compensation.

The Sixth Amendment assures the right to a speedy trial by a jury of one's peers, to be informed of the crimes with which they are charged, and to confront the witnesses brought by the government. The amendment also provides the accused the right to compel testimony from witnesses, and to legal representation.

The Seventh Amendment provides that civil cases also be tried by jury.

The Eighth Amendment prohibits excessive bail, excessive fines, and cruel and unusual punishments.

The Ninth Amendment states that the list of rights enumerated in the Constitution is not exhaustive, and that the people retain all rights not enumerated.

The Tenth Amendment assigns all powers not delegated to the United States, or prohibited to the states, to either the states or to the people.

WHEREFORE, Clayton DHS Family Victim Plaintiffs respectfully petition this Honorable Court to proceed with Complaint In Forma Pauperis because twenty-five months prolonged multiple victimizations of Philadelphia Family Court and DHS Defendants inflicted upon Clayton DHS Family Plaintiffs caused the poverty of Victim Family Plaintiffs. Clayton DHS Family Victim Plaintiffs are not able to pay the filing fee to eventually ask this Court to **Nullify the Illegal Adoption for profit** of kidnap victim four (4) year old Marc Anthony Clayton scheduled 10/13/2009. (Paragraph 1)

Clayton DHS Family Victim Plaintiffs pray the United States District Court for the Eastern District of Pennsylvania Protect Civil Rights of kidnapped minor child, Marc Anthony Clayton and **Nullify Illegal Adoption for profit** scheduled 10/13/2009.

Clayton DHS Family Victim Plaintiffs pray this Honorable Court return Philadelphia DHS kidnap Victim Plaintiff four (4) years old, Marc Anthony Clayton, to his Natural guardians and Protective Plaintiffs Mother and Grand Parents.

Respectfully submitted,

CLAYTON DHS FAMILY VICTIM PLAINTIFF

LYNNE CLAYTON,
NATURAL MOTHER

KIRT W. CLAYTON,
NATURAL MATERNAL GRANDFATHER

BARBARA E. CLAYTON,
NATURAL MATERNAL GRANDMOTHER

Date: October 13, 2009

EXHIBIT A

CORRUPT PHILADELPHIA FAMILY COURT AND DHS POSITIONED EMPLOYEES' VICIMIZATION OF CLAYTON FAMILY VICTIM PLAINTIFFS SPANNED 25 MONTHS AT TIME OF US EASTERN DISTRICT OF PENNSYLVANIA COMPLAINT

<http://citypaper.net/articles/2007/12/06>



ISSUE . December 6th 2007

NEWS .

Mama Drama

Fighting to have their voice heard, local mothers unite and challenge DHS policies.

by [Doron Taussig](#) Published: [Dec 4, 2007](#)

child welfare

Barbara Clayton has only three minutes to speak, but she could stand up here for hours. She would gladly unburden herself to this room, filled mostly with women, about her nightmarish journey through the child welfare system: the unreturned phone calls, the dismissive treatment, the apparent insistence on the part of the Department of Human Services (DHS) to put her grandson up for adoption. Instead, she just explains how she's "been working very hard to get my grandson back." But even this brief divulgence seems cathartic, because Clayton knows these women understand.

The group that Clayton is talking to is a gathering of parents who've had their children taken into custody by Philadelphia's DHS. They've convened in West Philly's Tabernacle United Church on this rainy Monday night for a meeting of the Every Mother is a Working Mother Network.

EMWMN formed in 1997, to oppose what organizer Pat Albright calls welfare "reform" because the group believes that society should give financial support to mothers. Recently, it's focused on the child welfare system, and particularly on parents whose children are in government custody. Philadelphia is ripe for such a group. DHS had already removed children at a higher rate than child protection agencies in New York City, Los Angeles and Chicago when, last fall, *The Philadelphia Inquirer* launched an investigative series about the agency. The paper revealed numerous cases in which DHS decided to leave children in their homes after receiving reports about them, and the children were harmed, sometimes fatally.



Michael T. Regan

TORCH BEARER: Tilly Ayala's protests have morphed into a growing support network for mothers seeking to get their kids back.

EXHIBIT A (continued)

CORRUPT PHILADELPHIA FAMILY COURT AND DHS POSITIONED EMPLOYEES' VICIMIZATION OF CLAYTON FAMILY VICTIM PLAINTIFFS SPANNED 25 MONTHS AT TIME OF US EASTERN DISTRICT OF PENNSYLVANIA COMPLAINT

<http://citypaper.net/articles/2007/12/06>

Beginning in October 2006, social workers responded by doing what they probably thought was "playing it safe." They began removing children at an increased rate. Between October and the end of January, 1,367 removals were conducted, a 28 percent increase over the same period in 2005-06. The spike leveled off in February, but shot up again in June. When child removals go up, so does the number of mothers who feel their children have been wrongly taken from them.

EMWMN might never have engaged child welfare had it not been for the stick-to-itiveness of a woman named Tilly Ayala. Ayala's two children, then 3 years and 6 months, were taken in 2004, she says, after her (now former) husband scared passers-by on a beach by saying that he had a baby for sale.

"It was a joke," Ayala says.

Since then, Ayala's children have been in the system, living with her ex-husband's relatives. Over a year ago, after unsuccessfully trying to get them back through traditional methods — attending parenting classes, etc. — Ayala began protesting in front of DHS headquarters. Every Thursday afternoon, she stood in front of 1515 Arch St., holding signs that said things like, "DHS, Give Us Back Our Children." At first, nothing came of the effort. But people gradually began to take notice. Ayala ran into Albright, from EMWMN, who took an interest in her cause; other parents, visiting the DHS building to deal with their own cases, began to join her, as well.

These parents were women like those at the recent meeting: like Clayton, whose grandson was taken from her daughter-in-law because of the woman's drug problems, and who found it infuriatingly difficult to get DHS to consider her as a possible caretaker for the boy (her cause was harmed by the fact that she'd been estranged from her daughter-in-law, and hadn't known her grandson well). Or Nina Boyd, a mother who believes that DHS was called to her house because she was a black woman living on a mostly white block. She says the agency took her children away, claiming she had roaches, and because her children had some absences from school.

It's very difficult to assess these stories because DHS can't discuss individual cases, but the underlying policy debate is clear. Generally, society should separate children from their parents only under dire circumstances, when the children are at definite risk. And indeed, DHS's protocols emphasize "family preservation."

But EMWMN believes the agency interprets the word "risk" too liberally. DHS, they say, equates "removal" with "safety"; EMWMN believes the safest place for a child is *almost* always in his parents' home. It's bringing aggrieved mothers together to create a child welfare system in this image.

EMWMN is not yet a formal organization with an official membership. Rather, its core group meets at least once a week, and is working to define the organization's role. Already it has succeeded in becoming a lobbyist for family preservation: A few months ago, DHS Commissioner

EXHIBIT A (continued)

CORRUPT PHILADELPHIA FAMILY COURT AND DHS POSITIONED EMPLOYEES' VICIMIZATION OF CLAYTON FAMILY VICTIM PLAINTIFFS SPANNED 25 MONTHS AT TIME OF US EASTERN DISTRICT OF PENNSYLVANIA COMPLAINT

<http://citypaper.net/articles/2007/12/06>

Arthur Evans walked by one of Ayala's protests, struck up a conversation, and invited her to join the agency's community advisory board. "I think one of the things the Department can't afford to do and be is defensive," Evans says.

Since then, Ayala, Albright and a few others have attended meetings where they've tried to drive home the message that DHS takes too many kids from their families. Evans, who has been at these meetings, agrees "with their basic premise," and says that family preservation "has been the consistent message we've given" since taking over last year. His administration, he says, is "actively working" to reduce placement rates by implementing a new guide for assessing children's safety, among other things. He wonders whether the activists' "personal experience hasn't caught up with our philosophy."

Those personal experiences are another aspect of child welfare that EMWMN is trying to change. In addition to lobbying, the group has become a resource for individual parents caught in the complex system. In the past few months, Albright says, EMWMN has helped people appeal to unresponsive workers' supervisors, and put cases in front of the commissioner. (Evans confirms this, though emphasizes that while DHS makes recommendations on removals, the final decision lies with a Family Court judge.) A couple of women they've worked with have even made progress in getting their children back — though not Ayala.

EMWMN has also stood next to women during difficult hearings, which leads to the third thing EMWMN has tried to do: Act as a support network. "You can hardly imagine anything more painful than losing custody of your child," Albright says. At the meeting tonight, the shared pain in the room is palpable; people gasp and sigh while Clayton, Boyd and others relate their stories. Also obvious is the release these folks feel as they spit out their harsh feelings about DHS. Some believe the agency's contractors hoard children for profit; some think there's no distinction between DHS and the Nazis.

These critiques ring false to people who know DHS workers. But these women have lost their children. Who could blame them for their anger? Certainly not Clayton. The next day, she would learn that, after months of desperate pleas, DHS had finally assented to inspect her house and consider her as a custodian for her grandson. But she wants to remain part of the group anyway.

"I told Pat Albright, 'I'll be happy to stick around and help,'" Clayton says. "You have to stick together."

EXHIBIT B

Culpable Employee Social Workers

Robin Steinman Program Coordinator

Renata Louis, Social Worker

Latasha Vassor Social Worker

Children's Choice, Inc.

Foster Care and Adoption Agency

Scot Plaza Two, Suite 325

Philadelphia, PA 19113

In their individual capacity and as employees who violated their employer's policies.



Links:

<http://www.hhs.gov/budget/09budget/2009BudgetInBrief.pdf>

- [Complete Adoption Agency Listing](#)
- [Select an Adoption Agency by its First Letter](#)
- [Select an Adoption Agency by its Zip Code](#)

Name	Children's Choice, Inc.
Address	Scot Plaza Two Suite 325 Philadelphia, PA 19113
Phone	(610)521-6270
Agency Type	Adoption, Foster Care
Service Provided	Family Foster Care, FFC/Medical, Caretaker/Kinship Care, Treatment/Foster Care Click here for the Glossary of Terms

Children's Choice, Inc. Mission Statement

Children's Choice provides community-based, specialized, Christian services.

Children's Choice serves as a bridge for individuals who are in need of the re-integrative processes of family living.

Intensive, individual, supportive casework counseling services empower clients to achieve their highest potential as responsible citizens.

Core Values

- To be committed to serve.
- To uphold Christian values.
- To provide and promulgate positive family environments.
- To promote family reunification.
- To facilitate choices, respecting each individual's right to choose.
- To work in a team oriented approach.
- To provide the physical, psychological and spiritual needs of others.
- To stimulate personal growth and self determination.
- To be agents of faith.
- To encourage and enhance social consciousness.

EXHIBIT C

Children's Choice, Inc.
Drs. Bill & Carolyn Eberwein
Scot Plaza Two, Suite 325
Philadelphia, PA 19113

In their individual and joint capacity as a privately owned Pennsylvania company
having annual sales \$12,903,467.00

Children's Choice History

Children's Choice was born on April 1, 1982, in Chester, Pennsylvania, founded by Rev. Drs. William and Carolyn Eberwein. With faith and determination, God has blessed our efforts and multiplied our capacity to serve his children.

Today, we are 27 years old, and currently serve well over one thousand children in four states and the District of Columbia.

Children's Choice Vision

Drs. Bill & Carolyn Eberwein

In the Bible, the Book of James, chapter 1, verse 27, says that the perfect religion is to take care of the widows and the orphans. Our calling is to serve God by serving His children. Our prayer is to achieve permanency for everyone entrusted to our care through the vehicle of servant leadership.

With the demise of the welfare program in the 1990s, and the epidemic of terrorism in much of the world, the need for human services has never been more intense. The statistics bearing witness to these needs are overwhelming. There are millions upon millions of neglected, abandoned and abused children, as well as multitudes of abandoned aged and infirm sinking into poverty and despair.

All of these persons need loving care. The task is daunting and we struggle to continue our high quality services while expanding them into many different states within the United States of America and to other nations where such work may be needed.

God does not ask us about our ability or our inability, only our availability and we stand ready, able and willing! Won't you join us in our efforts by becoming a foster parent, adoptive parent, a financial investor or a prayer partner?

The need is great and we covet your support. Call us at 1(800)LA-CHILD and we will discuss the ways you might join us in this most wonderful work.

EXHIBIT C (continued)

Children's Choice, Inc.
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In their individual and joint capacity as a privately owned Pennsylvania company
having annual sales \$12,903,467.00

Dun & Bradstreet October 7, 2009

Children's Choice, Inc Business Information

Children's Choice, Inc is a private company categorized under Childrens' Aid Society and located in Bellmawr, NJ. Our records show it was established in 1982 and incorporated in Pennsylvania. Current estimates show this company has an annual revenue of \$12,903,467 and employs a staff of approximately 140.

Annual Sales (Estimated)
\$12,903,467
Employees (Estimated)
140

SIC Code and Description	State of Incorporation
8322, Individual and Family Social Services	Pennsylvania
NAICS Code and Description	Years in Business
624110, Child and Youth Services	27

Exhibit D

Defendant: Marian Yongu
Human Services Program Administrator
Department of Human Services (DHS)
1515 Arch Street, Philadelphia, PA 19102

In their individual capacity and as a culpable accessory to Fraud, Illegal Adoption and Kidnapping due to administrative negligence
in DHS #0286930A; DP #D34440612; J #3906701



Welcome to the Contract Administration Home Page

The function of the Division of Contract Administration and Program Evaluation (CAPE) is to integrate, enhance, and better coordinate contract and performance evaluation functions in the divisions of Children and Youth, Juvenile Justice, and Community-Based Prevention. In addition, CAPE provides contract development and preparation assistance to the Department's Administration and Management division.

With 82% of the Department's budget allocated to purchased services, the contracting and performance evaluation processes are critical to the accomplishment of the DHS mission to ensure the safety, permanency, and well being of children and families in Philadelphia.

This new division is responsible for

- translating the Department's goals and objectives into service provision contracts
- centralizing the process of evaluating what works and which providers have consistently achieved optimal performance
- assuring all contracts contain performance standards that monitor achievement and assist DHS in making well-informed decisions about services funded by the Department.

Links:

Children's Choice, Inc., a Private Pennsylvania Company have Sales

- [Contract Service Provider List](#)

[http://dhs.phila.gov/intranet/pgintrahome_pub.nsf/Content/Contract%20Admin%20-%20Service%20Provider%20List/\\$File/FY2008%20provider%20agencies.pdf](http://dhs.phila.gov/intranet/pgintrahome_pub.nsf/Content/Contract%20Admin%20-%20Service%20Provider%20List/$File/FY2008%20provider%20agencies.pdf)

- [Who We Are - Contract Administration & Program Evaluation](#)