

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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MASHA ALLEN, by her Parent and	:	
Guardian FAITH ALLEN	:	DOCKET NO.
Johnstown, PA 15907	:	
	:	
vs.	:	
	:	
FAMILIES THRU INTERNATIONAL	:	
ADOPTION, INC.	:	
400 Bente West Court	:	
Evansville, IN 47715	:	
And	:	
CHILD PROMISE, INC. (formerly known	:	
as Reaching Out Through International	:	
Adoption, Inc)	:	
c/o JOSEPH P. HUDRICK	:	
Registered Agent	:	
4 Ridge Road	:	
Southampton NJ08 088	:	
And	:	
REACHING OUT THRU	:	
INTERNATIONAL ADOPTION, INC.	:	
c/o JOSEPH P. HUDRICK	:	
Registered Agent	:	
4 Ridge Road	:	
Southampton NJ 08088	:	
And	:	<b>JURY TRIAL DEMANDED</b>
JEANNENE SMITH	:	
312 South Lincoln Avenue	:	
Cherry Hill, NJ 08002	:	

**CIVIL ACTION COMPLAINT**

**PRELIMINARY STATEMENT**

This action seeks compensation from the adoption businesses who facilitated and permitted a pedophile to adopt, sexually molest and exploit the minor plaintiff for approximately 5 years. Despite one red flag after another, the defendant adoption

organizations recommended, facilitated and assisted a pedophile in the adoption of the minor plaintiff. Once placed with the pedophile, appropriate post placement evaluations were not performed. As a result, the minor plaintiff suffered unconscionable, repetitive and ongoing sexual abuse and sexual exploitation.

**JURISDICTION AND VENUE**

1. Jurisdiction is conferred upon this Court by virtue of the parties' diversity of citizenship pursuant to 28 U.S.C. §1332.

2. The amount in controversy is in excess of Seventy-Five Thousand Dollars (\$75,000) exclusive of interest and costs.

3. Venue is properly placed in the District Court of New Jersey pursuant to 28 U.S. C. §1391 because the defendants reside in the district or have conducted business in this district.

**FACTS IN SUPPORT OF CAUSES OF ACTION**

4. The minor plaintiff, Masha Allen is a minor citizen of the Commonwealth of Pennsylvania and resides in Johnstown, PA with her parent Faith Allen.

5. Defendant Families Thru International Adoption, Inc ("FTIA") is a state licensed child placement agency, organized and existing under the laws of Indiana, with offices located at 400 Bente West Court, Evansville, Indiana 47715.

6. At all times material hereto, FTIA acted through its agents, servants, and/or employees acting within the course and scope of their employment.

7. Defendant Child Promise, Inc. (formerly known as Reaching Out Thru International Adoption, Inc.), is a business entity organized and existing under the laws of the State of New Jersey, with offices located at 144 South White Horse Pike, Somerdale, New Jersey, 08083.

8. Child Promise, Inc. is the successor in interest and in liability to Reaching Out Thru International Adoption, Inc.

9. Defendant Reaching Out Through International Adoption, Inc. (“ROTIA”) is an international adoption agency, which may or may not have been licensed by the State of New Jersey at various material times, with offices located at 144 South White Horse Pike, Somerdale, New Jersey 08083.

10. At all times material hereto, ROTIA acted through its agents, servants and employees acting with the course and scope of their employment.

11. Defendant Jeannene Smith is an adult individual, founder/operator of Reaching Out Thru International Adoption, Inc., who resides at 312 South Lincoln Avenue, Cherry Hill, NJ 08002.

12. At times material hereto, Jeannene Smith acted through her agents, servants and/or employees within the course and scope of their agency.

13. At times material hereto, Jeannene Smith was the agent, servant and employee of FTIA and thereafter ROTIA and Child Promise, Inc. and acted in the furtherance of the business of FTIA and ROTIA.

14. The minor plaintiff was born in Novochakhtinski Russia on August 26, 1992. At the approximate age of three, the minor plaintiff was placed by the Russian Government in an orphanage.

15. In or about July of 1996, defendant Smith became an employee and/or agent of FTIA for the purpose of identify potential clients for FTIA and for creating awareness of FTIA's adoption program in the New Jersey/Pennsylvania vicinity. Defendant Jeannene Smith provided these employment services in an about the State of New Jersey.

16. In September of 1997, Matthew Mancuso, a single 39 year old divorced male, residing in New Kensington, PA, submitted an adoption application to defendant FTIA with Jeannene Smith.

17. In application papers submitted by Matthew Mancuso to FTIA, Mancuso indicated that he preferred to adopt a five year old female from Russia.

18. On or about September of 1998, Mr. Mancuso submitted an application for a home family study to be performed by Adiago Health (formerly known as Family Adoption Counsel).

19. In Pennsylvania and New Jersey, a home study report, required under 23 PA. C.S. §2530 and N.J.S.A. §9:3-54.2 respectively, is an evaluation of the fitness of a potential adopting parent(s) to provide a loving, stable home environment for an adopted child.

20. 23 PA. C.S. §2530(a) provides in pertinent part:

No intermediary shall place a child in the physical care or custody of a prospective adoptive parent or parents unless a home study containing a favorable recommendation for placement of a child with the perspective parent or parents has been completed with three years prior thereto...

N.J.S.A. § 9:3-54-2 provides in pertinent part:

...[A] home study completed by an approved agency shall include a recommendation regarding the suitability of the home for the placement of the child...

21. A reasonable and objective review of the home study performed by Adiago reveals that not only had Mancuso not been in a stable and supportive relationship with another person, let alone a child, for years, the last personal relationship ended in divorce whereby he became estranged from his own biological daughter. Yet, this man was specifically seeking the adoption of a 5 year old girl under the auspices that he could provide a stable family relationship and family environment for her.

22. Despite the red flags in Mr. Mancuso's home study, FTIA and/or ROTIA failed to perform any investigation into Mr. Mancuso or the veracity of the information he supplied. At no time did FTIA investigate Mancuso's fitness to adopt a child or question the reasonableness of the information contained in the home study report.

23. On or about January 26, 1998, Mancuso sent FTIA a written letter as to why he wanted to adopt as well as reference letters including one that he forged from his own daughter Rachel Mancuso Byers. In Mr. Mancuso's letter, he writes,

“it became clear to me that I really need the day to day routine and family to make my life complete. I then began investigating the possibility of adopting.”

24. At no time did FTIA, Jeannene Smith, or subsequently ROTIA question Mancuso as to why he sought to create a family through the adoption of a 5 year old girl. and not by the customary means of dating, marriage and procreation. At no time did FTIA, Jeannene Smith, or subsequently ROTIA question the reasonableness of why a single man who had been divorced over 11 years with no evidence that he had engaged in

a stable relationship with another person during that 11 year period, needed to create a family with a 5 year old girl.

25. Despite the red flags, FTIA, Jeannene Smith, and subsequently ROTIA failed to investigate or otherwise determine the veracity of Mr. Mancuso's statement.

26. At no time did FTIA, ROTIA or Smith contact the Mancuso's birth daughter to determine the veracity of the forged reference letter.

27. Although FTIA was not the agency that ultimately placed the minor plaintiff with Mancuso, FTIA facilitated the adoption process and at no time acted on the red flags evident in Mancuso's efforts to adopt a young girl.

28. In or about February of 1998, defendant Jeannene Smith ceased her employment relationship with FTIA and formed an entity known as Reaching out Through International Adoption ("ROTIA").

29. Based on information and belief, ROTIA may not have been a properly incorporated and/or a properly licensed business in the State of New Jersey for a period of time relevant to this matter.

30. On or about July of 1998, ROTIA and Jeannene Smith facilitated the adoption of Masha Allen, from Russia by Mr. Mancuso.

31. On or about July 11, 1998, Mr. Mancuso returned to the United States from Russia with the minor plaintiff.

32. Pennsylvania Code 55 Pa. Code §3350.13 requires a minimum of 3 post adoption placement supervisory visits with the child and the adoptive parent(s) within a six month period.

34. Russian law required Mancuso to undergo four post placement visits performed at six, twelve, twenty-four and thirty-six months. Reports generated by those visits were to be forwarded to the Russian Government.

35. ROTIA and Jeannene Smith never informed the Commonwealth of Pennsylvania that a child had been placed in the home of Mancuso.

36. Upon information and belief, ROTIA and Jeannene Smith never informed Adiago Health that a child had been placed with Mancuso nor sought Adiago's assistance in performing post placement evaluations of Mancuso.

37. ROTIA and Jeannene Smith knew that Mancuso was not obtaining appropriate post placement evaluations but failed to investigate and take appropriate action to have a proper post placement evaluation performed.

38. On or about March 23, 1999, ROTIA and Jeannene Smith received a post placement evaluation of Mancuso and the minor plaintiff from an entity called Social Services of Western Pennsylvania. Neither ROTIA nor Jeannene Smith knew of an entity called Social Services of Western Pennsylvania and in fact no such entity existed and the evaluation was fake.

39. ROTIA and Jeannene Smith failed to take appropriate and reasonable action to determine whether Social Services of Western Pennsylvania was a viable agency.

40. In November of 2000, ROTIA and Jeannene Smith performed a post-placement evaluation by telephone with Mr. Mancuso despite the fact that post placement evaluations are required to be performed in person.

41. Had ROTIA performed an in person post placement evaluation of Mr. Mancuso, they would have determined that Mancuso did not provide the minor plaintiff with her own bedroom and required the minor plaintiff to sleep with him.

42. Had FTIA acted on the red flags evident in Mancuso's adoption application and home study, the minor plaintiff's adoption by Mancuso would not have occurred.

43. Had ROTIA and Smith acted on the red flags evident in Mancuso's adoption application and home study and had properly performed post placement evaluations, the minor plaintiff's adoption by Mancuso would not have occurred and/or would have been terminated.

44. Over a period of approximately five years, Mr. Mancuso molested the minor plaintiff and sexual abused her on a nightly basis. At times, Mr. Mancuso chained the minor plaintiff in the basement.

45. To prevent the minor plaintiff from maturing, Mancuso starved her and only provided her small rations of food.

46. Over a period of approximately five years, Mancuso took hundreds sexually explicit photographs of the minor plaintiff and posted them on the internet. Mancuso subjected the minor plaintiff to extreme exploitation, sadomasochism, starvation and forced exhibitionism.

47. On May 23, 2003, Matthew Mancuso was arrested and charged with various counts of child abuse. The minor plaintiff was removed from his home and his custody.

**COUNT I**  
**MINOR PLAINTIF VS. FTIA**

48. The averments set forth in paragraphs 1 through 47 inclusive, are incorporated hereby by reference.

49. The negligence and carelessness of FTIA consisted of the following:

- a) Failure to properly investigate and evaluate Mancuso to determine his fitness to adopt;
- b) Failure to corroborate the information provided by Mancuso;
- c) Failure to check and corroborate references supplied by Mancuso;
- d) Failure to properly evaluate informed contained in the home study
- e) Failure to properly assess whether the home study report reflected that Mancuso had appropriate parenting skills;
- f) Failure to properly assess the home study report to determine the nature of the family life Mancuso would provide the minor plaintiff;
- g) Failure to properly question and assess the import of Mancuso's request to adopt a 5 year old girl;
- h) Failure to properly question and assess Mancuso's inability to maintain a relationship with his biological daughter;
- i) Failure to properly question and assess the lack of any relationships in Mancuso's life since his divorce;
- j) Improperly facilitating an adoption by a pedophile;
- k) Facilitating an adoption without a proper state license;
- l) violating the laws and regulations of the State of New Jersey.

50. As a result of the defendant's negligence, the minor plaintiff was adopted by a pedophile and suffered horrific physical harm and mental anguish. The minor plaintiff will continue to suffer horrific mental anguish into the future.

51. As a result of the defendant's negligence, minor plaintiff has in the past and will in the future suffer a loss of the enjoyment of life and quality of life.

52. As a result of the defendant's negligence, minor plaintiff has in the past and will in the future incur otherwise unnecessary medical expenses, treatment and costs.

53. As a result of the defendant's negligence, the minor plaintiff may suffer a loss in earning capacity.

**WHEREFORE**, plaintiff respectfully request judgment in her favor and against defendants, joint and severally, plus interest and costs of suit.

**COUNT II**  
**MINOR PLAINTIF VS. CHILD PROMISE, INC.**

54. The averments set forth in paragraphs 1 through 53 inclusive, are incorporated hereby by reference.

55. The negligence of Child Promise, Inc. consisted of the following:

- a) Failure to properly investigate Mancuso to determine his fitness to adopt;
- b) Failure to corroborate the information provided by Mancuso;
- c) Failure to check and corroborate references supplied by Mancuso;

- d) Failure to properly evaluate information contained in the home study;
- e) Failure to properly assess whether the home study report reflected that Mancuso had appropriate parenting skills;
- f) Failure to properly assess the home study report to determine the nature of the family life Mancuso would provide the minor plaintiff;
- g) Failure to properly question and assess the import of Mancuso's request to adopt a 5 year old girl;
- h) Failure to properly question and assess Mancuso's inability to maintain a relationship with his biological daughter;
- i) Failure to properly question and assess the lack of any relationships in Mancuso's life since his divorce;
- j) Improperly facilitating an adoption by a pedophile;
- k) Failure to notify a state agency of Mancuso's adoption;
- l) Failure to investigate the lack of post placement evaluations;
- m) Failure to properly question the veracity of an alleged post placement evaluation performed by Social Services of Western Pennsylvania;
- n) Failure to provide appropriate post placement evaluations;
- o) Improperly conducting a post placement evaluation by telephone.
- p) Facilitating an adoption without a proper state license;
- q) violating the laws and regulations of the State of New Jersey.

56. As a result of the defendant's negligence, the minor plaintiff was adopted by a pedophile and suffered horrific physical harm and mental anguish. The minor plaintiff will continue to suffer horrific mental anguish into the future.

57. As a result of the defendant's negligence, minor plaintiff has in the past and will in the future suffer a loss of the enjoyment of life and quality of life.

58. As a result of the defendant's negligence, minor plaintiff has in the past and will in the future incur otherwise unnecessary medical expenses, treatment and costs.

59. As a result of the defendant's negligence, the minor plaintiff may suffer a loss in earning capacity.

**WHEREFORE**, plaintiff respectfully request judgment in her favor and against defendants, joint and severally, plus interest and costs of suit.

**COUNT III**  
**MINOR PLAINTIF VS. ROTIA**

60. The averments set forth in paragraphs 1 through 59 inclusive, are incorporated hereby by reference.

61. The negligence of ROTIA consisted of the following:

- a) Failure to properly investigate Mancuso to determine his fitness to adopt;
- b) Failure to corroborate the information provided by Mancuso;
- c) Failure to check and corroborate references supplied by Mancuso;
- d) Failure to properly evaluate information contained in the home study;
- e) Failure to properly assess whether the home study report reflected that Mancuso had appropriate parenting skills;
- f) Failure to properly assess the home study report to determine the nature of the family life Mancuso would provide the minor plaintiff;

- g) Failure to properly question and assess the import of Mancuso's request to adopt a 5 year old girl;
- h) Failure to properly question and assess Mancuso's inability to maintain a relationship with his biological daughter;
- ii) Failure to properly question and assess the lack of any relationships in Mancuso's life since his divorce;
- j) Improperly facilitating an adoption by a pedophile;
- k) Failure to notify a state agency of Mancuso's adoption;
- l) Failure to investigate the lack of post placement evaluations;
- m) Failure to properly question the veracity of an alleged post placement evaluation performed by Social Services of Western Pennsylvania;
- n) Failure to provide appropriate post placement evaluations;
- o) Improperly conducting a post placement evaluation by telephone.
- p) Facilitating an adoption without a proper state license;
- q) violating the laws and regulations of the State of New Jersey.

62. As a result of the defendant's negligence, the minor plaintiff suffered horrific physical harm and mental anguish. The minor plaintiff will continue to suffer horrific mental anguish into the future.

63. As a result of the defendant's negligence, minor plaintiff has in the past and will in the future suffer a loss of the enjoyment of life.

64. As a result of the defendant's negligence, minor plaintiff has in the past and will in the future incur otherwise unnecessary medical expenses, treatment and costs.

**WHEREFORE**, plaintiff respectfully request judgment in her favor and against defendants, joint and severally, plus interest and costs of suit.

**COUNT IV**  
**MINOR PLAINTIF VS. JEANNENE SMITH**

65. The averments set forth in paragraphs 1 through 64 inclusive, are incorporated hereby by reference.

66. The negligence of Jeannene Smith consisted of the following:

- a) Failure to properly investigate Mancuso to determine his fitness to adopt;
- b) Failure to corroborate the information provided by Mancuso;
- c) Failure to check and corroborate references supplied by Mancuso;
- d) Failure to properly evaluate information contained in the home study;
- e) Failure to properly assess whether the home study report reflected that Mancuso had appropriate parenting skills;
- f) Failure to properly assess the home study report to determine the nature of the family life Mancuso would provide the minor plaintiff;
- g) Failure to properly question and assess the import of Mancuso's request to adopt a 5 year old girl;
- h) Failure to properly question and assess Mancuso's inability to maintain a relationship with his biological daughter;
- i) Failure to properly question and assess the lack of any relationships in Mancuso's life since his divorce;
- j) Improperly facilitating an adoption by a pedophile;
- k) Failure to notify a state agency of Mancuso's adoption;

- l) Failure to investigate the lack of post placement evaluations;
- m) Failure to properly question the veracity of an alleged post placement evaluation performed by Social Services of Western Pennsylvania;
- n) Failure to provide appropriate post placement evaluations;
- o) Improperly conducting a post placement evaluation by telephone.
- p) Facilitating an adoption without a proper state license;
- q) violating the laws and regulations of the State of New Jersey.

67. As a result of the defendant's negligence, the minor plaintiff was adopted by a pedophile and suffered horrific physical harm and mental anguish. The minor plaintiff will continue to suffer horrific mental anguish into the future.

68. As a result of the defendant's negligence, minor plaintiff has in the past and will in the future suffer a loss of the enjoyment of life and quality of life.

69. As a result of the defendant's negligence, minor plaintiff has in the past and will in the future incur otherwise unnecessary medical expenses, treatment and costs.

70. As a result of the defendant's negligence, the minor plaintiff may suffer a loss in earning capacity.

**WHEREFORE**, plaintiffs respectfully request judgment in her favor and against defendants, joint and severally, plus interest and costs of suit.

**KOLSBY, GORDON, ROBIN, SHORE & BEZAR**

Robert N. Hunn /s/  
ROBERT N. HUNN  
ATTORNEY FOR PLAINTIFF

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JS 44 (Rev. 12/07, NJ 5/08)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS** MASHA ALLEN by her PNG  
FAITH ALLEN

**(b)** County of Residence of First Listed Plaintiff LEBANON

**(c)** Attorney's (Firm Name, Address, Telephone Number and Email Address)  
ROBERT N. HUNN, ESQUIRE  
KOLSBY, GORDON, ROBIN, SHORE & BEZAR  
2000 MARKET ST., 28th FL., PHILA., PA  
(215) 851-9700 rhunn@kolsbygordon.com

**DEFENDANTS** FAMILIES THRU INTERNATIONAL  
ADOPTION, INC., CHILD PROMISE, INC,  
ET AL.

County of Residence of First Listed Defendant \_\_\_\_\_

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

- II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)
- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

- III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)
- (For Diversity Cases Only)
- |   |                                       |   |  |                                |                                |
|---|---------------------------------------|---|--|--------------------------------|--------------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1            | DEF <input checked="" type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business in This State     | PTF <input type="checkbox"/> 4 | DEF <input type="checkbox"/> 4 |
| Citizen of Another State                | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2                | Incorporated <i>and</i> Principal Place of Business in Another State | <input type="checkbox"/> 5     | <input type="checkbox"/> 5     |
| Citizen or Subject of n Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3                | Foreign Nation   | <input type="checkbox"/> 6     | <input type="checkbox"/> 6     |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 430 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISON SENTENCES</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

- V. ORIGIN** (Place an "X" in One Box Only)
- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

**VI. CAUSE OF ACTION** Brief description of cause:  
**NEGLIGENT ADOPTION PLACEMENT**

**VII. REQUESTED IN COMPLAINT:**  CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** >\$100,000 **CHKC YES only if demanded in complaint: JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S)** (See instructions): JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

Explanation: 9/15/08  
DATE: 9/15/08 SIGNATURE OF ATTORNEY OF RECORD: 