

STATE OF LOUISIANA THROUGH
THE DEPARTMENT OF CHILDREN
AND FAMILY SERVICES

DOCKET NO. 612,926 DIV. 27

19TH JUDICIAL DISTRICT COURT

VERSUS

OUR BLESSING CHRISTAIN DAYCARE
DAYCARE/ALETHA HAYNES

EAST BATON ROUGE PARISH

STATE OF LOUISIANA

STATE

JUL 23 2012

BY [Signature]
CLERK OF COURT

CONSENT ORDER

This matter was set for hearing July 23, 2012 on the State's request for a preliminary injunction to halt the operation of an unlicensed child day care facility. Prior to hearing, the parties reached an agreement and enter into this Consent Order on the following terms:

1. Defendant, **ALETHA HAYNES** consent to the issuance of a preliminary injunction prohibiting her from operating a child day care facility without a license;
2. In recognition of **ALETHA HAYNES** cooperation, the State waives its request for statutory fines and penalties so long as **ALETHA HAYNES** complies with this order;
3. **ALETHA HAYNES** does agree to allow the Louisiana Department of Children and Family Services access to the facility as necessary to conduct site visits in compliance with state and federal guidelines.

The Court being satisfied that the Consent Order is reasonable under the circumstances, considering the verified petition and supporting affidavits, and is in accordance with law and evidence in this case, therefore

IT IS ORDERED that a preliminary injunction issue, directed to defendant **ALETHA HAYNES**, and enjoining, restraining and prohibiting her, her officers, directors, agents, employees, representatives, and all others acting on her behalf, from operating a child day care facility without a license; this preliminary injunction to be effective during the pendency of these proceedings;

IT IS FURTHER ORDERED that the State hereby waives the statutory fines and penalties sought in its petition, contingent upon Defendant's compliance

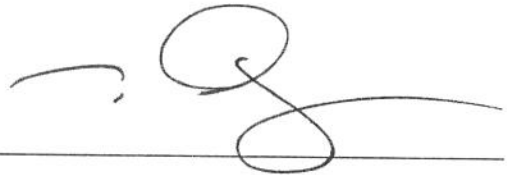


REC'D C.P.
JUL 24 2012

with this Order;

IT IS FURTHER ORDERED that **ALETHA HAYNES** do consistent with this Order, allowing the Louisiana Department of Children and Family Services access to the facility as necessary to conduct site visits in compliance with state and federal guidelines.

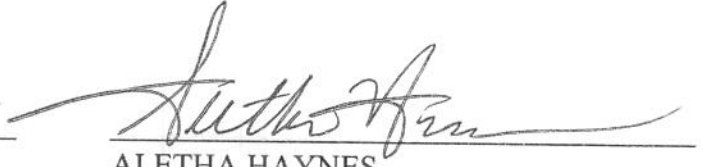
So ordered at Baton Rouge, Louisiana, this 26 day of July, 2012.



JUDGE
19TH JUDICIAL DISTRICT COURT

FOR PLAINTIFF:

FOR DEFENDANTS:



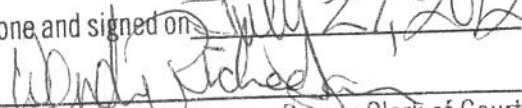
DARRICK M. LEE, J.D., LL.M.
LA. BAR ROLL# 28655
DEPARTMENT OF CHILDREN
AND FAMILY SERVICES
BUREAU OF GENERAL COUNSEL
P.O. BOX 1887
627 N. FOURTH STREET
BATON ROUGE, LA 70821
(225) 342-1110 FAX 342-9139

ALETHA HAYNES
4669 SOUTHPARK DRIVE
BATON ROUGE, LA 70816
PH 225-292-6570

FILED
EAST BATON ROUGE PARISH, LA
2012 JUL 26 PM 2:44

DEPUTY CLERK OF COURT

I hereby certify that on this day a notice of the above judgment was mailed by me, with sufficient postage affixed, to:

Done and signed on July 27, 2012

Deputy Clerk of Court

Our Blessing Christian Daycare,
Darrick Lee, Aletha Haynes

STATE OF LOUISIANA THROUGH
THE DEPARTMENT OF CHILDREN
AND FAMILY SERVICES

DOCKET NO. 612926 DIV

SEC.

VERSUS

19TH JUDICIAL DISTRICT COURT

OUR BLESSING CHRISTAIN DAYCARE
DAYCARE/ALETHA HAYNES

EAST BATON ROUGE PARISH
STATE OF LOUISIANA

PETITION FOR INJUNCTIVE RELIEF

NOW INTO COURT, through undersigned Counsel, comes the State of Louisiana, through the Department of Children and Family Services ("the Department"), who files this Petition for preliminary and permanent injunctive relief under the Child Care Facilities and Child-Placing Agencies Licensing Act.

1.

Defendant, **ALETHA HAYNES**, is an adult resident of this Parish.

2.

Defendant, **ALETHA HAYNES** does not possess a license from the State of Louisiana to operate a daycare center as defined by Louisiana Statute.

3.

Defendant is operating a child day care facility at 4669 Southpark Drive, Baton Rouge, Louisiana, 70816 without a valid child day care license and has done so continuously since at least February 14, 2012.

4.

Defendant is providing care and supervision on a regular basis to seven or more children whose parents do not remain on the premises and who are not related to the caregiver, and operate their facility on a regular basis in excess of twelve and one-half hours per week.

5.

Because defendant does not have a license to operate lawfully and have continued to operate in violation of law despite actual knowledge that a license was required prior to beginning operation the Department asks that a preliminary injunction issue as provided under

La. R.S. 46:1422
2012 JUN 14 PM 3:20
DOUG WELBORN
19TH JUDICIAL DISTRICT
EAST BATON ROUGE PARISH, LA
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6.

After trial on the merits the Department asks that the preliminary injunction be made permanent.

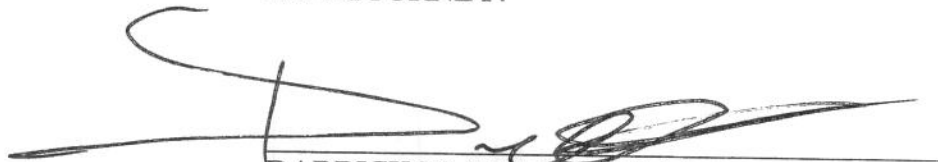
7.

In addition, the Department seeks the statutory fines provided under La. R.S. 46:1421 of not less than seventy-five dollars (\$75.00) per day, nor more than two hundred fifty dollars (\$250.00) per day, for each day defendants have operated a child day care facility without a valid license.

WHEREFORE the Department respectfully requests:

1. That defendant, **ALETHA HAYNES**, be ordered to appear and show cause, on a date and time to be set by this Court, why a preliminary injunction should not issue, without bond, and enjoining, restraining and prohibiting them, their officers, agents, employees, representatives, and all others acting at their direction or on their behalf, from operating a child day care facility without a license during the pendency of these proceedings;
2. That after trial on the merits there be judgment in favor of the Department, and against Defendants, assessing Defendants the mandatory fines of not less than seventy-five dollars per day nor more than two-hundred fifty dollars per day, for each day they have operated a child day care facility without a license;
3. That after trial on the merits a permanent injunction issue, in form and substance like the preliminary injunction requested above; and
4. That all costs of these proceedings be taxed to Defendants.

BY ATTORNEY:



DARRICK M. LEE, J.D., LL.M.
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STATE OF LOUISIANA THROUGH
THE DEPARTMENT OF CHILDREN
AND FAMILY SERVICES

DOCKET NO. _____ DIV. _____

VERSUS

19TH JUDICIAL DISTRICT COURT

OUR BLESSING CHRISTAIN DAYCARE
DAYCARE/ALETHA HAYNES

EAST BATON ROUGE PARISH
STATE OF LOUISIANA

VERIFICATION

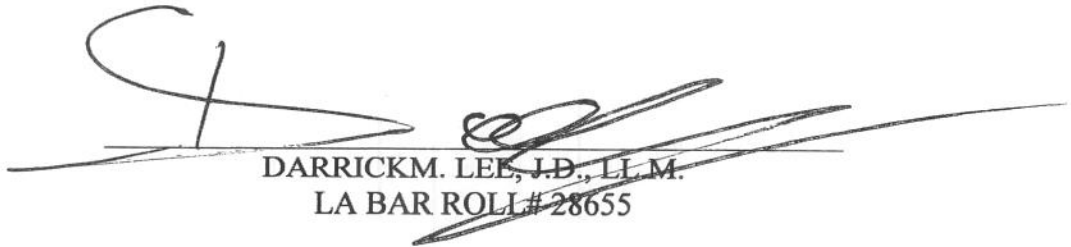
Before me, the undersigned Notary Public, personally came and appeared

ANGIE L. BADEAUX,

627 N. Fourth Street, Baton Rouge, Louisiana, who after being duly sworn stated that she has read the foregoing Petition and that the facts set forth therein are true and correct to the best of her knowledge, ability and belief.


ANGIE BADEAUX, LICENSING DIRECTOR

SWORN AND SUBSCRIBED before me, the undersigned Notary Public, this 13 day of June, 2012.


DARRICKM. LEE, J.D., LL.M.
LA BAR ROLL # 28655