

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

SHARONELL FULTON, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	No. 2:18-cv-02075
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, <i>et al.</i> ,	:	
	:	
Defendants.	:	

**DECLARATION OF STEPHANIE HAYNES,  
EXECUTIVE DIRECTOR OF  
PHILADELPHIA FAMILY PRIDE**

I, Stephanie Haynes, declare as follows:

1. I am the Executive Director of Philadelphia Family Pride (“PFP”). I have worked with PFP since 2008 and have served as Executive Director since 2014. Since 2017, I have also served on the Philadelphia Mayor’s Commission for LGBT Affairs.
2. PFP is a nonprofit membership organization, founded in 1993, of LGBTQ+ parents and prospective parents (including foster and adoptive parents) and their children.
3. PFP’s members include same-sex couples who seek to foster children in Philadelphia.
4. PFP seeks to protect the interests and rights of same-sex couples and their families, including the right to equal treatment of those seeking to care for children in the public child welfare system.
5. PFP is also committed to recruiting foster parents from the LGBTQ+ community in order to help meet the need for families for children in Philadelphia’s foster care system.

**PFP's Work to Recruit LGBTQ+ Foster Parents**

6. PFP has been holding foster parent recruitment events since 2015, and in partnership with the City of Philadelphia since 2017, in an effort to help address the shortage of qualified, licensed foster parents in Philadelphia.

7. In particular, PFP has worked with the City at their request to address the need for more supportive foster care placements for LGBTQ+ youth in Philadelphia by recruiting prospective foster parents from within the LGBTQ+ community.

8. Over the past year, PFP has held five events designed to recruit LGBTQ+ people to serve as foster parents in Philadelphia, and we have more events planned for later in 2018, with the next event scheduled for August. Sixty-six prospective foster parents attended PFP's recruitment events between September 2017 and April 2018. Among the prospective foster parents who attended were a married gay male couple who live in Philadelphia and who both work in the medical field. They expressed interest in fostering kids with special medical needs.

9. The concerns of many LGBTQ+ people about whether or not they will be welcomed as foster parents in the system is already an impediment to PFP's efforts to recruit foster parents.

10. While the idea of helping children is an easy one to embrace, actually becoming a foster parent is not a snap decision or a quick process for most families. Many parents have shared with me that becoming a foster parent is something that often takes months or years of thinking, planning, and discussing before even making that first call or attending that first information meeting. Nor is becoming a foster parent a quick or easy process. The foster care system is hugely complex, and it can be difficult to understand and navigate the bureaucracy.

11. In addition to these hurdles faced by everyone considering becoming a foster parent, in PFP's experience, same-sex couples who are considering becoming foster parents often have additional concerns about the risk of discrimination in the foster and adoption process. News of codified discrimination in other states, knowledge of past inequity in the system, and often first-hand experience of being treated differently in public spheres because of their sexual orientation or relationship already give some same-sex couples pause.

12. As a known and trusted LGBTQ+ organization, PFP works to help overcome LGBTQ+ people's hesitancy about whether or not they and their families would be accepted in the system and treated with respect and fairness. At PFP's recruitment events, we answer same-sex couples' many questions to help remove some of the mystery surrounding the public child welfare system. We connect prospective parents to current LGBTQ+ foster parents and local foster agencies to give them a realistic but motivating view of what life as a foster family would be like.

### **Impact of a Ruling for Plaintiffs**

13. A ruling in favor of Plaintiffs would send the message to PFP's members that the City's contractors are free to reject them as foster parents because of religious objections to their sexual orientation and relationships.

14. Rejecting same-sex couples because they are same-sex couples—and not for any reason related to their qualifications to be foster parents—would subject those couples and their families to harm and stigma.

15. A ruling in favor of Plaintiffs would also deter many qualified people from the LGBTQ+ community from attempting or completing the foster parent licensing process. If people left one of our events and then contacted an agency in their neighborhood that turned

them away, that sting of rejection could be enough to keep them from making a second or third call.

16. PFP would likely have to expend additional resources on recruiting prospective LGBTQ+ foster parents in order to overcome the additional deterrent effect of a ruling in favor of Plaintiffs. With already a severe need for additional homes for children, we should be doing more to remove hurdles that keep people from becoming foster parents, not adding additional ones.

17. If Plaintiffs prevail, many families headed by same-sex couples may ultimately decide not to seek to become foster parents at all in light of the risk that they will be turned away. Understandably, many LGBTQ+ people may not want to subject themselves and their families to unequal treatment. In particular, same-sex couples with children who have been involved in discussions about the possibility of fostering additional children may especially want to protect their families from possible discrimination during the foster care licensing process.

18. As a result, children in need of good foster homes, including LGBTQ+ youth in need of affirming homes, may lose the chance to be placed with qualified families from the LGBTQ+ community—placements that could be in those children's best interests.

19. Therefore, I respectfully request that the Court grant leave for Philadelphia Family Pride to participate in this litigation as an intervenor-defendant so that we may present evidence and argument to the Court demonstrating that the relief sought by CSS would harm PFP's members and undermine PFP's efforts to recruit foster parents.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/14/18

  
Stephanie Haynes