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STATE OF HAWAI'I

**Electronically Filed**  
**FIRST CIRCUIT**  
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**31-JAN-2026**  
**06:21 PM**  
**Dkt. 604 EXH**

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT  
STATE OF HAWAI'I

JOHN ROE NO. 121,

Plaintiff,

vs.

STATE OF HAWAI'I; JOHN A. TEIXEIRA;  
JOHN DOES 1-10; DOE CORPORATIONS  
1-10; DOE PARTNERSHIPS 1-10; DOE  
NON-PROFIT ENTITIES 1-10; and DOE  
GOVERNMENTAL ENTITIES 1-10,

Defendants.

CIVIL NO.: 1CC191001419  
(Other Non-Motor Vehicle Tort)

TRIAL EXHIBIT P-4

Judge: Honorable Kevin T. Morikone  
Trial: April 22, 2024

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

1. Defense State of Hawaii Response to Plaintiffs 1<sup>st</sup> Request for Answers to Interrogatories dated 05/26/20
2. Defense State of Hawaii Response to Plaintiff's 1<sup>st</sup> Request for Production of Documents dated 06/30/20
3. Defense State of Hawaii 1<sup>st</sup> Amended Response to Plaintiff's Request for Production of Documents dated 04/22/20
4. Defense J [REDACTED] T [REDACTED] Answers to Plaintiffs 1<sup>st</sup> Request for Answers to Interrogatories to Defense T [REDACTED] dated 02/04/22
5. CPSS Log of Contacts – Case Name: J [REDACTED] T [REDACTED] – Case # 00046680  
Narrative Account Reports 03/04/1997 – 01/25/2012
6. CPSS – Workers' Findings Report – Case Name: J [REDACTED] T [REDACTED] – Case # 00068773 dated 09/21/2003
7. CPSS – CWS – Case Assignment History – Case Name: J [REDACTED] T [REDACTED] – Case # 00068773 dated 10/06/04 and 11/06/03
8. Institutional Abuse Investigative Report – Redacted dated 03/20/03, signed 05/12/03
9. Home Study Records for J [REDACTED] T [REDACTED]
  - a. History and Current Functioning of Prospective Family (page 8 – 11)
  - b. Children – Medical Report for Each Child (pages 12-15)
  - c. Family as a System (pages 16-17)
  - d. Family Assessment Summary (pages 18-21)
  - e. J [REDACTED] T [REDACTED] – Annual Evaluation of a Foster Home (CFH) 09/06/00 – 01/22/01 (pages 22-25) dated 08/03/01
  - f. Provisional Certifications (Page 26) dated 08/03/01
  - g. J [REDACTED] T [REDACTED] – Annual Evaluation of Foster Home (CFH) 01/31/20 – 01/02/03 (pages 27-30) dated 02/03/03
  - h. J [REDACTED] T [REDACTED] – Annual Evaluation of Foster Home (CFH) 03/14/03-05/15/03 (page 31) dated 05/23/03
  - i. Additional Information 07/09/03-07/22/03 (page 32) dated 07/28/03
  - j. J [REDACTED] T [REDACTED] – Annual Evaluation 01/14/05 -02/10/05 (pages 33-37) dated 03/16/05 and 03/23/06
  - k. J [REDACTED] T [REDACTED] – Annual Evaluation of a Foster Home (CFH) 12/29/06-02/23/07 (pages 38-41) dated 05/25/07
10. M [REDACTED] T. Defense 1<sup>st</sup> Amended Response to Plaintiffs RPOD, bated (SOH 1-757D  
State of Hawaii, Department of Human Services, Social Services Division – Log of Contact Report – Case Name: M [REDACTED] T [REDACTED] case #: 00048313 dated 09/10/97 – 09/17/97; 05/08/98 – 12/30/98; 08/27/99 – 11/19/99; 09/20/00; 01/06/99 – 06/25/99 (pages 1- 76)

Ninth Guardian ad Litem report 11/09/99

Permanent Plan 04/22/99

Amended Letters of Permanent Custody 05/07/99

Eight Guardian ad Litem report 04/23/99

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED] John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

State of Hawaii DHS – SSD Referral to Family Court 04/22/99

State of Hawaii DHS – SSD Child Welfare Services Branch letter dated 04/22/99

Orders Concerning Child Protective Act 11/19/98

Permanent Plan 11/14/98

Permanent Plan 11/13/98

Seventh Guardian ad Litem Report 11/10/98

Referral to Family Court 11/14/98

State of Hawaii Adoption Unit letter dated 11/14/98

Order Concerning Child Protective Act 05/08/98

Referral to Family Court 05/05/98

State of Hawaii Adoption Unit letter dated 05/05/98

Report of Court 05/05/98

Orders Concerning Child Protective Act 05/11/98

Permanent Plan 02/10/98

Referral to Family Court 02/10/98

State of Hawaii Adoption letter dated 02/10/98

Motion for Immediate Review to Continue Adoption/Legal Guardianship, Hearing scheduled for 02/11/98, to set aside or to extend time for Filing of Adoption Petition; Declaration of Jacquelyn demerits; Exhibit A; Notice of Motion 02/05/98

Report of Court 01/28/98

Notice of Motion 02/03/98

Referral to Family Court 04/18/97

Permanent Plan 04/03/97

Orders Concerning child Protective Act 10/11/97

Petition for Family Supervision 09/27/98

Safe Family Home Guidelines 09/27/95

State of Hawaii – Family Court – Face Sheet 09/27/95

Protective Custody Form 10/02/95

State of Hawaii – Department of Health Services – Social Service Division – CPS Intake Document 01/22/99

Face Sheet 09/19/97

Determination of IV – E Eligibility 12/09/98

Recertification of Eligibility for Title IV-E Foster care 06/08/99

Determination of IV-E Eligibility 06/29/99 – Recertification of Eligibility for Title IV-E Foster care

Child Data Display

HMSA Health Insurance Care – Blue Cross – T [REDACTED] M [REDACTED] 06/01/98

HMS Health Insurance Care Blue Cross T [REDACTED] M [REDACTED] 08/01/98

Determination of IV-E Eligibility 12/24/97

Recertification of Eligibility for Title IV-E Foster Care 12/26/97

Notification of Foster Care Placement and Removal 09/10/97

Notification 10/04/96

DentiCare – Treatment Authorization and billing form 06/09/99

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

HMSA – Blue Cross Insurance Card T [REDACTED] M [REDACTED] 02/01/00  
Request for Services 06/02/99  
State of Hawaii – Department of Health Services – Social Services Division Child Welfare Services Branch – Permanent Assistance Agreement 04/12/99  
State of Hawaii – Department of Health Services – Family and Adult Services Division – Application for Permanency Assistance 04/21/09  
State of Hawaii – Adoption Unit – Special Services Cost Determination Worksheet – J [REDACTED] T [REDACTED] 07/31/98  
HMSA – Blue Cross – Report to Member 02/06/99  
Clinical Psychologist letter 08/07/98  
State of Hawaii – Requisition and Purchase Order (K-mart) 07/31/98  
Social Security Card – T [REDACTED] M [REDACTED]  
Log of Contacts – Narrative Display 07/15/98  
Request for Service 05/05/98  
Kapiolani Medical Center 07/17/98  
Log of Contact 07/30/98  
State of Hawaii – Department of Health Services – Family and Adult Services Division CPSS Check Cancellation 06/10/98  
State of Hawaii – Department of Health Services – Letter confirming health coverage 05/21/98  
Child Data – update – case process 06/02/98  
Notice History 06/01/98  
Pupils Health Record – T [REDACTED] M [REDACTED]  
State of Hawaii – Department of Health Services - letter confirming health coverage 10/30/96  
State of Hawaii – Department of Health Services – letter confirming health coverage 10/10/95  
General Case Data – Display Case Process 08/04/97  
Log of Contacts Narrative Case Process 05/31/98 - 09/20/00  
Family Court Hearing 02/11/98  
Transfer Summary 08/04/97  
Handwritten note 05/31/98  
Handwritten note 05/20/98  
Handwritten note 04/21/99  
Adoption Unit – Oahu Child Welfare Service Section letter dated 02/13/99  
Waimanalo Elementary and Intermediate School report card 01/20/99  
Psychological Evaluation re: T [REDACTED] M [REDACTED] 04/23/98  
State of Hawaii – Department of Education 02/24/98  
Letter 12/30/98  
Kapi'Olani Medical Center for Women and Children Emergency 05/31/98  
Agreement between and Department of Human Services and Substitute Caretaker 05/26/98  
State of Hawaii – Department of Education – Maili Elementary School – Application for Regular Summer School 05/31/98  
Enchanted Lake Elementary Summer School Registration 06/15/98  
State of Hawaii – Department of Health Services – Social Services Division – Referral of Prospective Foster Home for Special Child

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

Supplement to Foster/Adoption Home Application 06/02/98  
Placement Request Card 05/22/98  
Adoption Review Team (ACT) Worksheet 06/02/98  
Face Sheet Permanent Plan 02/10/98  
Safe Family Home report 10/30/96  
Safe Family Home report 04/08/97  
State of Hawaii – Department of Health Services – Family and Adult Services Department – Admission to Emergency Shelter and Home 05/31/98  
Kapiolani Medical Center 05/31/98  
Kahi Mohala – outpatient psyche services 05/28/98  
State of Hawaii – Department of Health Services – Family and Adult Services Division – Admission to Emergency Shelter/Home and Discharge from Emergency Shelter Home 06/02/98  
State of Hawaii – Department of Health Services – Family and Adult Services Division – Admission to Emergency Shelter/Home and Discharge from Emergency Shelter Home 05/26/98  
State of Hawaii – Department of Health Services – Family and Adult Services Division – Agreement between the Department of Human Services and Substitution Caretaker 05/26/98  
Request for Services 05/26/95, 05/22/95  
Discharge from Emergency Shelter/Home and Admission to Emergency Shelter Home 05/21/98  
Medical Information Form 04/21/97  
Adoption Review Team (ART) worksheet 04/01/97  
Wai'Anae Coast Community Mental Health – Psychological Evaluation 04/10/96  
State of Hawaii – Department of Health Services 03/30/98  
Department of Social Services and Housing Foster Home Finding Unit 02/27/98  
Maili Elementary Teachers Report form 03/16/98, 03/03/98  
Letter from State of Hawaii – Department of Health Services – Adoptions Unit dated 02/17/98 and 02/10/98  
Residence Information  
Child Welfare Services Worker's Foster Home Assessment  
State of Hawaii – Department of Social Services and Housing – Public Welfare Division – Log of Contact 08/22/96 – 12/03/96  
Clearance 12/11/95  
Adoption Review Team (ART) Worksheet 04/01/98  
Wai'Anae Coast Community Mental Psyche Evaluation 04/10/96  
State of Hawaii – fax 03/01/97 enclosing letter 03/20/97, 03/17/97, report card (year 96,97)  
Makaha Elementary School Report 10/08/96  
Family Court of 1<sup>st</sup> Circuit – State of Hawaii Judgement 05/11/90  
Permanency Assistance Documents for T [REDACTED] M [REDACTED]  
State of Hawaii – Department of Health Services – letter approval for medical assistance 05/21/08  
Log Contacts – Narrative 05/21/08  
State of Hawaii – Department of Health Services – Social Services Division – letter dated 04/30/08  
Notification of Foster Care Placement Removal 12/12/07  
State of Hawaii – Department of Health Services – Difficulty of Care Worksheet and Agreement 01/16/07

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

State of Hawaii – Department of Health Services – Difficulty of Care Annual Review 01/16/07  
State of Hawaii – Department of Health Services – Notification of Review of Permanency Assistance Agreement 02/23/06  
State of Hawaii – Department of Health Services – Adoptions Unit re: Special Services Cost Determination 07/31/98  
State of Hawaii – Department of Health Services – Family and Adult Services Division – Application for Permanency Assistance 04/21/09  
State of Hawaii – Department of Health Service letter to J [REDACTED] T [REDACTED] dated 05/31/02  
State of Hawaii – Department of Health Services – Notification of Biennial Review of Permanency Assistance Agreement 04/23/03  
Permanent Assistance Agreement 04/21/99  
Clinical Psychologist letter 05/11/02  
Request for a Copy of Vital Statistics Record  
State of Hawaii – Department of Health Services 12/07/22  
Department of Health Services – Med-Quest Division 11/30/00  
State of Hawaii – Department of Health Services – Social Service Division letter to J [REDACTED] T [REDACTED] dated 10/18/00  
Letter – undated  
Log of Contact – Narrative Display 11/19/99, 06/17/99, 06/14/99  
State of Hawaii – Department of Health Services – Notification of Foster Care Placement and Removal 06/14/09  
Transfer Requirement for Cases Transferring to YSU 06/14/99  
Family Court – State of Hawaii – Orders Concerning Child Protective Act 11/19/99 and Exhibit A 05/07/99  
State of Hawaii – Department of Health Services – Social Services Division – Referral to Family Court 04/22/99  
Family Court – State of Hawaii – Amended Letters of Permanent Custody 05/07/99  
Family Court = State of Hawaii – Order Awarding Permanent Custody and Establishing a Permanent Plan; Exhibit A 08/04/97  
State of Hawaii – Department of Health Services – Family and Adult Services Division – Permanent Plan 07/23/97  
Family Court – State of Hawaii – Letters of Permanent Custody 08/07/97  
Family Court – State of Hawaii – Orders Concerning Child Protective Act 10/11/97  
State of Hawaii – Department of Health Services – Social Service Division – Log of Contacts Report – Case Process 04/24/17  
Notation Completion of C9968 – Narrative Account 05/06/08  
State of Hawaii, Department of Social Services Department – Foster Home Application 06/02/98  
Provisional Approval of Homes for Special Children  
  
J [REDACTED] T [REDACTED] – Log of Contact 06/10/98 - 10/12/98  
Home Study 03/15/01  
Family Assessment Summary 10/16/98  
Provisional Certification 10/19/98  
Unconditional Approval 05/26/00

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

Social Worker Action Notice 12/24/08  
License Resource Facilities 12/24/08  
Notice of Termination or Reduction of Service 12/24/08  
License Resource Facilities 05/29/07

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 05/25/07  
Waimanalo Health Center 03/12/07

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 12/29/06  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 03/17/05  
– Notice of Disposition of Application/Referral 03/18/05

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 01/14/05  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 07/28/03  
– Amended Certificate

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 06/18/03  
Public Health Records

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 02/03/03  
Notification of Foster Care Placement/Removal 03/08/03  
License Resource Facility 04/30/02

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 08/08/01  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 07/27/01  
– Notification of Foster Care Placement and Removal 07/24/01, 07/25/01, 02/13/01

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 09/08/00  
– Notification of Foster Care Placement and Removal 11/15/00, 08/08/00, 06/29/00, 06/08/00,  
04/20/00

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 05/25/00  
Notification of Foster Care Placement and Removal dated 01/14/00, 01/21/00, 12/23/99, 11/30/99,  
11/08/99, 06/09/99, 06/16/99, 03/29/99, 03/30/99, 02/17/99, 02/24/99

Floor Plan Drawing

License Resource Facilities 07/30/98

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 09/19/98  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 07/10/98  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 07/07/98

State of Hawaii, Department of Social Services Department – Foster Pride/Adopt Pride Certification  
08/13/98

License Resource Facilities 06/10/98

Referral of Prospective Foster Home for Special Child 06/02/98

State of Hawaii, Department of Social Services Department – Family Court of the First Circuit – Letter  
to Foster Home Licensing dated 01/13/98

J [REDACTED] T [REDACTED]'s Annual Recertification Report – 07/14/97, 08/01/96, 07/07/95, 12/06/94

Home Study – J [REDACTED] T [REDACTED] 02/19/91

Medical Report – Dr. Joseph Tsai 12/18/91

Foster Parenting Program – Foster Home Application 02/22/91

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 12/24/98

Handwritten notes 12/16/97

Personal Information Form 03/08/98

**Review of Records by Francesca LeRúe**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

CPSS Case Name: F [REDACTED] S [REDACTED] - CPSS#42681

Family Member Summary

Case Assignment History 11/22/95 - 04/19/06

CPSS – Log of Contacts 11/22/95-06/30-04

CPS Case Name: M [REDACTED] R [REDACTED]

CPS #56484

CPSS Log of Contact 12/09/99-06/18/04

Court Documents Re: R [REDACTED] M [REDACTED]

Order Appointing Guardian with Unlimited Authority, Exhibit A 08/21/07

Juvenile Contact Report 01/31/08

State of Hawaii – Arrest Report 01/31/08

Hawaii County Police Department 02/20/08

Abuse of Family or Household Members Warning Citation 02/01/08

Bail/Bond Release Form and Notice to Appear 02/01/08

State of Hawaii – Orders Concerning Child Protective Act Re: R [REDACTED] only 08/15/07

State of Hawaii – Petition for Appointment of Guardian of a Minor, Notice of Hearing 07/27/07

Notice of Hearing 07/30/07

List of Exhibits 07/07/07 and Exhibits A-G

State of Hawaii, Department of Human Services, Social Services Department – Referral to Family Court

Family Court – State of Hawaii – Summary of Court 06/27/07

Nomination of the Guardian of the Person 07/21/07

Order Concerning Child Protective Act re: R [REDACTED] Only 05/22/07

Letters of Co-Permanent Custody 05/22/07

Order Concerning Child Protective Act re: R [REDACTED] 11/27/06

Order Continuing Motion Awarding Permanent Custody as to \_\_\_\_\_ and R [REDACTED] 12/07/98

Motion for Immediate Review to Order Permanent Custody as to \_\_\_\_\_ and R [REDACTED]; Declaration of Martha C. Kim; Notice of Motion 09/03/98

Order Awarding Permanent Custody and Establishing a Permanent Plan; Exhibit A 04/25/98

Motion for Order Awarding Permanent Custody and Establishing a Permanent Plan; Affidavit of Robylynne Fountain; Exhibit A; Notice of Motion 02/12/98

Notice of Motion 03/18/98

Comprehensive Strengths and Risk Assessment Rating Tool 05/06/08

Notice of Termination or Reduction of Service 03/03/11

State of Hawaii, Department of Social Services Department – Notice 02/14/08

CPSS – Intake Document 01/31/08

Requisition and Purchase Order 08/23/10

Ross Dress for Less 09/23/10

HMS/BlueCross – Medical Card – R [REDACTED] M [REDACTED]

State of Hawaii, Department of Social Services Department – Letter re: Medical Benefits 06/12/09

Difficulty of Care Work Sheet and Agreement 05/07/08

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

The Salvation Army – Family Intervention Services 03/07/08  
Certificate of Birth – R [REDACTED] M [REDACTED]  
SSA Card – R [REDACTED] M [REDACTED]  
Medical Card 09/09/02 - R [REDACTED] M [REDACTED]  
Letter Med-Quest to R [REDACTED] – Request for U.S. Citizenship/Lien Status Documents 06/28/06  
State of Hawaii, Board of Education – Letter to J [REDACTED] T [REDACTED] dated 11/22/11  
State of Hawaii, Department of Social Services Department – Letter dated 04/26/10  
State of Hawaii, Department of Social Services Department – Letter dated 01/21/10  
HMSA/BlueCross Letter dated 12/2009  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 07/23/09  
Narrative Justification 07/10/09  
Requisition and Purchase Order 07/15/09  
Ross Dress for Less 08/24/09  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] 06/15/09  
Purchase Order Maintenance 10/23/08  
Requisition and Purchase Order 09/10/08  
Emails 10/23/08  
Comprehensive Strengths and Risks Assessment Rating Tool 05/06/08  
State of Hawaii, Department of Social Services Department – Letter dated 04/23/08  
Permanency Assistance Review 05/07/08  
Difficulty of Care Work Sheet & Agreement 04/23/08  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 06/14/06  
Log of Contacts Report – Case Process 01/31/08

Admission to Foster Home or Emergency Shelter Home  
Assignment Report – Ofcr B. Acdal 02/01/08  
Juvenile Contact Report 02/01/08  
Permanency Assistance Agreement 07/12/07  
Application for Permanency Assistance 07/12/07  
State of Hawaii Letter to J [REDACTED] T [REDACTED] dated 07/18/07  
Independent Living Program Application 08/08/07

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 07/05/07  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 03/01/07  
Family Court – Ex-Parte Motion for Order Joining the Department of Human Services as a Party  
05/03/07  
Motion of Disposition of Application /Referral 03/01/07  
State of Hawaii, Department of Social Services Department –Requested Difficulty of Care (D)C  
01/30/07  
State of Hawaii, Department of Social Services Department – Permanent Assistance Agreement  
06/16/04

State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 08/22/05  
Difficulty of Care (DOC) Work Sheet and Agreement 08/22/05

Case Name: T [REDACTED] J [REDACTED] - CPSS #46680

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

Case Family Member History

Intake History 03/20/03, 01/31/08

CPS Intake Document

CPSS Log of Contacts 02/25/97-01/25/12

11. M [REDACTED] T. - Deposition of Elladine Olevao dated 04/27/22 (child Welfare Services Branch Administrator for the State of Hawaii)
12. Exhibits 1-4 for Elladine Olevao deposition
  - a. Plaintiff's John Roe No. 121's 1<sup>st</sup> Notice of Taking Rule 30(b)(6) Deposition of Defendant State of Hawaii Certificate of Service
  - b. Institution Abuse Investigative Report with Letter dated 06/18/03
  - c. Referral of Prospective Foster Home for Special Child dated 06/02/1998
  - d. Provisional Approval of Homes for Special Children
  - e. Placement Request Card dated 05/22/1998 (listed but not attached)
13. M [REDACTED] T. - Deposition of Defendant J [REDACTED] T [REDACTED] dated 04/19/22
14. M [REDACTED] T. - Exhibits 1-6 for J [REDACTED] T [REDACTED]'s Deposition
  - a. Exhibit 1 - Interrogatories
  - b. Exhibit 2 - Letter and report dated 06/18/03 SOH 000772
  - c. Exhibit 3 - One page handwritten note, SOH 000383
  - d. Exhibit 4 - One page excerpt, SOH 000447
  - e. Exhibit 5 - Letter, 02/23/06, SOH 000636
  - f. Exhibit 5 - Report, SOH 000024
15. M [REDACTED] T. - Deposition Transcript of Pamela Silva dated 07/01/22
16. M [REDACTED] T. - Deposition Transcript of Pamela Silva dated 07/01/22 - condensed
17. M [REDACTED] T. - Exhibits 1-4, 6 for Pamela Silva's deposition
  - a. Exhibit 1 - CPSS Case Name: J [REDACTED] T [REDACTED] CPSS #: 68773, CSW Worker Assignment History 10/06/04 - 10/04/04, 03/20/02 - 11/16/03
  - b. Exhibit 2 - CPSS Case Name: J [REDACTED] T [REDACTED] CPSS #: 68773, Investigative Summary for Intake #94206 dated 09/21/03
  - c. Exhibit 3 - Instruction Abuse Investigation Report - Face Sheet 05/12/03
  - d. Exhibit 4 - Log of Contact 01/09/03 - 01/07/04
  - e. Exhibit 6 - CPSS Case Name: T [REDACTED], J [REDACTED] CPSS # 68773, Intake 94206, dated 03/20/03
18. Plaintiff John Roe No. 121's First Supplemental Answers and Responses to Defendant State of Hawaii's First Combined Discovery Request dated 09/28/22
19. Deposition of Julie Stielow dated 09/09/22
20. Exhibits 1 - 7 for Julie Stielow's deposition
  - a. Exhibit 1 - Transfer Summary 09/04/07
  - b. Exhibit 2 - Handwritten notes dated 05/31/98, 05/20/98, 05/23/98
  - c. Exhibit 3 - Referral of Prospective Foster Home for Special Child 06/02/98
  - d. Exhibit 4 - Adoption Review Team Worksheet 06/02/98
  - e. Exhibit 5 - Log of Contact Report - Case Process, Case No. : 00048313, Case Name: M [REDACTED] T [REDACTED] 09/10/97 - 06/25/99
  - f. Exhibit 6 - Placement Request Card 05/22/98
  - g. Exhibit 7 - Handwritten note 04/21/99

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

21. Deposition of N [REDACTED] M [REDACTED] dated 09/13/22
22. Psychological Evaluation, Chalsa M. Loo, Ph.D. dated 09/22/22
23. Case Name S [REDACTED] J [REDACTED] Case No.: 00024100  
State of Hawaii – Department of Health Services – Social Services Division

Log of Contact Report – Case Process dated 12/28/94, 08/04/95, 04/19/96, 07/03/99, 10/10/96, 02/07/97, 04/28/97, 09/11/97

State of Hawaii – Department of Health Services – Social Services Financial Plan

HMSA – Identification Card – re: J [REDACTED] S [REDACTED] dated

11/01/91-11/30/91

10/01/91-10/31/91

09/01/91-09/30/91

08/01/91-08/31/91

07/01/91-07/31/91

06/01/91-06/30/91

05/01/91-05/31/91

06/01/91-06/30/91

05/01/93-05/31/93

04/01/93-04/30/93

03/01/93-03/31/93

02/01/93-02/26/93

01/01/93-01/31/93

12/01/92-12/31/92

10/01/92-10/31/92

09/01/92-09/30/92

08/01/92-08/31/92

07/01/92-07/31/92

04/01/92-04/30/92

01/01/92-01/31/92

02/01/92-02/29/92

03/01/92-03/31/92

Signed Enveloped dated 01/27/92

Wa'ianae Coast Comprehensive Health Center 05/1981

Vaccine History Card 04/14/92

State of Hawaii – Depart of Health Services – Letter to Parents Attending Wai-anae Area Intermediate/High School

Opportunities for Free Measles Immunization

Certificate of Live Birth – S [REDACTED] J [REDACTED] 06/05/81

Social Security Card – J [REDACTED] S [REDACTED]

Admission to Emergency Shelter 04/24/91

Elementary Progress Report Form 01/24/92

Letter dated 04/29/91 to T.J. and J [REDACTED] from mother

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED] John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

Pupil's Health Record

Elementary Progress Report Form 03/30/92

State of Hawaii – Department of Health Services – Public Welfare Division – Agreement between the Department of Human Services and Substitute Caretaker 04/21/91

Student Progress Report – Elementary Lanakila 1991

Kapiolani Medical Center for Women and Children, Honolulu, Hawaii Discharge Summary 12/10/91

State of Hawaii – Department of Health Services – Family and Adult Services Division – Child's Information and Visitation Plan 04/24/91

In the Family Court of the First Circuit of State of the Hawaii – Guardian ad Litem Fifth Report to the Court 10/20/93

Elementary Progress Report Form 11/14/91

State of Hawaii – Department of Health Services – Family and Adult Services Division Referral to Family Court 10/18/93

Arthur L. Walker, III, Ph.D. 12/02/96

HMSA – Report to Member 05/04/96

Arthur L. Walker, III, Ph.D. 10/10/95

Special Service Cost Determination Work Sheet

Special Service Cost Eligibility Determination and Foster Parent Agreement 10/25/95

State of Hawaii – Requisition and Purchase Order 08/25/95

HMSA – Report of Member 09/02/95

Hawaii Department of Social Services and Housing – SS Form B 01/11/95

HMSA- Report of Member 07/03/95

HMSA – Report of Member 06/01/95

MHSA – Report of Member 05/01/95

HMSA – Report of Member 04/03/95

HMSA – Report of Member 03/01/95

HMSA ID Card 11/16/94 – S [REDACTED] J [REDACTED]

State of Hawaii – Requisition and Purchase Order 09/01/94

Kmart Sales Contract 09/29/94

HMSA – Report of Member 01/03/95

HMSA ID Card 12/21/94 – S [REDACTED] J [REDACTED]

Queen's Hawaii Care 08/01/94 – DentiCare in Hawaii Care Plus

State of Hawaii – Department of Health Services Letter dated 06/15/94 to J [REDACTED] S [REDACTED] case transfer

Vendor Code – Kmart Stores 08/04/94

Hawaii Department of Human Services Appropriation 003-103 Warrants 05/01/94

Hawaii Department of Special Services and Housing – Social Services Payment – Forma 11/03/94 and Form B 11/03/91

Mileage Form – J [REDACTED] S [REDACTED] 11/1993, 12/1993, 01/1994, 02/1994

Batch Submission Control

Hawaii Department of Social Services and Housing – Social Services Payment – Form A and Form B dated 03/18/94 02/11/94, 02/01/94, 01/19/94, 10/06/93

Determination of IV-E Eligibility 03/08/96

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED] John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

Notification of Foster Care Placement and Removal 02/14/94  
Re-certification of Eligibility for Title IV – E Foster Care 03/08/94  
IV-E Retroactive Claim  
Assignment of Rights 03/08/94  
Application for Child Support Enforcement Services 03/08/94  
Assignment of Rights to Support 03/08/94  
Memorandum 02/01/94, 01/94, 01/11/94  
Special Services Cost Eligibility Determination and DHS – Foster Parent Agreement re: J [REDACTED] S [REDACTED] dated 01/05/94  
Special Service Cost Determination Work Sheet 12/21/93 – J [REDACTED] S [REDACTED]  
GEM of Hawaii, Inc. Invoice 09/19/93  
Central Case Data – Display Case Process 09/09/91  
HMSA – Temporary Medicaid ID Card 10/01/93  
Determination of Foster Care Placement and Removal 10/01/93, 10/18/93  
Hawaii Department and Social Services and Housing Social Services Form AX and BX 10/01/73  
11/18/02 – P. Oshiro – approved DD Change  
Notification of Foster Care Placement and Removal 12/28/94  
Application for Child Support Enforcement Services 07/22/88  
State of Hawaii – Department of Social Services and Housing – Public Welfare Division Information and Referral Form  
Notification of Foster Care Placement and Removal 03/04/97, 11/20/96, 08/06/96  
MQD/FASD Referral Notices 08/19/96  
Recertification of Eligibility for Title IV-E Foster Care 05/22/96  
MQD/FASD Referral Notices 05/08/96  
Notification of Foster Care Placement and Removal  
Closing Summary 10/27/97  
Log of Contacts – Narrative Display Case Name J [REDACTED] S [REDACTED] Case No: 00024100 12/28/94  
Adoption Unit – Child Welfare Services Birth Certificate – J [REDACTED] S [REDACTED]  
Social Security Card J [REDACTED] S [REDACTED]  
HMSA Medicaid ID Card 10/01/93 – 10/31/93; 04/01/91-04/30/91  
State of Hawaii Department of Health – Tuberculosis Branch 05/23/91, 08/31/93  
HMSA – Report to Member 10/03/97  
Hale Kipa – Youth Services letter dated 03/17/97  
Progress Summary – Grade 11 02/01/97  
State of Hawaii – Requisition and Purchase Order 02/06/97  
Hale Kipa – Authorization, Consent and Release for Treatment of a Minor 02/05/97  
Hale Kipa Independent Living Program – Parental Consent and Release 02/05/97  
Changes to Lri 10/22/96  
Information Sheet 08/05/96  
State of Hawaii Requisition Purchase Order 08/19/96  
State of Hawaii Family and Adult Services Division, Oahu Branch Youth Services Unit 06/17/96  
Arthur L. Walker, III, Ph.D 06/24/96  
Special Service Cost Determination Work Sheet – J [REDACTED] S [REDACTED]

**Review of Records by Francesca LeRúe**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED] John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

Special Service Cost Eligibility Determination and Department of Health Services – Foster Parent Agreement 05/16/96  
Case Data 04/24/91  
HMSA – Report to Member 04/06/96  
Kahuku High/Intermediate School 04/11/96 Academic Report Final  
HMSA – Report of Member 03/02/96  
Kahuku High/Intermediate School Student Timetable  
Kahuku Report Card 06/25/95  
Determination of IV-E Eligibility 05/01/95  
Notification of Foster Care Placement and Removal  
Recertification of Eligibility for Itle IV-E Foster Care 05/01/95  
Kahuku Summer School 1995 Grade 9  
Notification of Foster Care Placement and Removal 12/28/94  
PSI After Hours Alert 06/06/94  
Evaluation of P [REDACTED] and B [REDACTED] D [REDACTED] for the Adoption of Specific Children 09/18/96  
State of Hawaii Family Court letter 11/12/93  
Family and Adult Services Division Dependent Children Unit II letter to J [REDACTED] T [REDACTED] 01/31/94  
Letter to Dr. Arthur Walker, III dated 10/21/93  
Rob L. Wetzel, Ph.D – Summary of Psychological Assessment 09/13 & 20/1993  
State of Hawaii Childs Information Visitation Plan 10/01/93  
Dependent Children's Unit II Aide Services 09/13/93  
Memo/Route form 09/13/93  
State of Hawaii letter dated 09/07/93 to Lee Dean, Social Worker 08/13/93  
Admission to Emergency Shelter Home 08/12/93  
Wai'anae Intermediate Grade 7 ad Grade 8  
State of Hawaii – Department of Human Services – Family and Adult Services Division letter dated 10/21/93 to Dr. Arthur L. Walker, III  
Discharge from Emergency Shelter Home 10/01/93  
State of Hawaii - Department of Human Services – Family and Adult Services Division – Referral of Prospective Foster Home for a Specific Child 10/12/93  
Placement Request Card 10/12/93  
Note 10/12/93  
Memorandum/Route Form 10/04/93  
State of Hawaii – Family and Adult Services Division dated 10/01/93 to J [REDACTED] T [REDACTED]  
Emergency Medical Consent Form 10/04/93  
Authorization to Treat a Minor Form 12/01/93  
Foster Home Referral 09/17/93  
Request for Use of Family Court Foster Home 09/17/93  
Pre-placement Plan 09/17/93  
State of Hawaii – Family Court Letter to Lee Dean, MSW dated 09/14/93  
Child's Medical Record – Examination and Recommendation  
Message Note 08/17

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

State of Hawaii Family Court letter to Lee Dean, SW dated 08/13/93

DPS Request for Evaluation 09/08/93

Family Court of the First Circuit State of Hawaii – Report – Safe Home Guidelines 03/18/92

State of Hawaii Family Court letter to Lee Dean, SW 09/07/93

Emergency Shelter Home 08/12/93

Power Posse News 09/21/92

Progress Report Wai'anae Intermediate School 09/18

State of Hawaii - Department of Human Services Family and Adult Services Division 05/28/92

State of Hawaii – Department of Human Services – Memo 03/24/92

American Youth Soccer Organization 08/29/91

The Casey Family Program Child Inquiry Form 04/22/91

State of Hawaii Department of Human Services Agreement between the DHS and Substitute Caretake 04/24/91

Discharge Form Emergency Shelter Home 07/27/88

Placement Request Card 07/22/88

Admission to Emergency Shelter

Pupil Progress Report 07/11/88

Family Court of the First Circuit State of Hawaii – Guardian ad Litem Fifth Report of the Court  
10/20/93

24. D [REDACTED] F [REDACTED]:

Service Placement Summary Descending by AFCARS Clients # 10/06/91 – 12/31/98

State of Hawaii – Department of Human Services – Social Service Division – Log of Contacts Report

Case Process; Case No.: 0040076, Case Name: D [REDACTED] F [REDACTED] 01/13/92 – 03/15/99

**Review of Records by Francesca LeRue**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

**DUPLICATE RECORDS:**

Orders Concerning Child Protective Act 05/07/99  
Permanent Plan 04/22/09  
Safe Family Home Report 04/09/97  
Permanent Plan 11/13/98  
Psychological Evaluation 04/23/98  
Permanent Plan 02/10/98  
Order Awarding Permanent Custody and Establishing a Permanent Plan; Exhibit A 08/04/97  
Order Divestine Mothers' Parental Rights 04/21/97  
Motion for Order Awarding Permanent Custody and Establishing a Permanent Plan; Affidavit of Lawrence Dolan; Exhibit A; Notice of Motion 04/11/97  
Safe Family Home Report 04/08/97  
Notice of Motion 04/11/97  
Safe Family Home Guidelines 10/30/1996  
Certificate of Live Birth – T [REDACTED] M [REDACTED]  
HMSA Health Insurance Care – Blue Cross – T [REDACTED] M [REDACTED] 06/01/98  
Permanent Assistance Agreement  
Clinical Psychologist letter 08/07/98  
State of Hawaii – Adoption Unit Special Service Cost Determination Worksheet – J [REDACTED] T [REDACTED] 07/31/98  
Notice of Custody and Delivery of Child 01/31/08  
State of Hawaii, Department of Social Services Department – to J [REDACTED] T [REDACTED] 04/30/08  
Memo dated 08/30/08 to J [REDACTED] T [REDACTED] from S [REDACTED] V [REDACTED] re: Guardianship Petition Withdraw 08/20/08  
Memo dated 09/24/08 to Roselyn Vierhes from S [REDACTED] V [REDACTED] re: Return Voucher  
State of Hawaii, Department of Social Services Department – Letter to R [REDACTED] M [REDACTED] dated 03/04/11, 07/29/11  
Notification of Foster Care Placement Removal 02/01/08  
CPSS Case Name: T [REDACTED] J [REDACTED] - CPSS#68773  
Family Member Summary  
CWS Worker Assignment History 10/06/04  
List of Intakes 03/20/03  
CPS Intake Document 03/20/03  
Invest. Summary for Intake 09/21/03  
CPSS Log of Contact 03/25/03-10/17/03  
State of Hawaii, Department of Social Services Department – Letter to Judiciary Foster Parenting Program 01/06/98  
State of Hawaii, Department of Social Services Department – Letter to J [REDACTED] T [REDACTED] dated 03/16/01 – Notification of Foster Care Placement and Removal 12/26/00  
Annual Evaluation of Foster Home – J [REDACTED] T [REDACTED] – Log of Contact 09/06/00 - 01/22/01  
Annual Evaluation of Foster Home Additional Information Log of Contact 01/02/03 – 01/31/02  
Annual Evaluation of Foster Home Additional Information 03/14/03 – 05/15/03 and 07/09/03 – 07/22/03  
Annual Evaluation of Foster Home – Log of Contact 01/14/05 – 02/10/05  
Annual Evaluation of Foster Home – Log of Contact 12/29/06 – 02/23/07  
Annual Clearance 02/03/03

**Review of Records by Francesca LeRúe**

**In re. T.M.NO. 121, Plaintiff v. State of Hawaii; J [REDACTED] T [REDACTED]; John Does 1-10; Doe Partnerships 1-10; Non-Profit Entities 1-10; and Doe Governmental Entities 1-10.**

Request for Criminal Clearance 01/06/03, 05/19/00, 06/10/98

State of Hawaii, Department of Social Services Department – CPS Intake Document 01/22/99

State of Hawaii, Department of Social Services Department – Foster Home Application 06/25/98

State of Hawaii, Department of Social Services Department letter dated 06/18/03 and Institutional Abuse Investigation Report –Face Sheet 05/13/03  
State of Hawaii, Department of Social Services Department – CPS Intake Document 03/20/03

State of Hawaii, Department of Social Services Department – CPS Intake Document 01/31/08

Request for Criminal History Record Clearance 02/23/07

Clearance 12/29/06

Request for Criminal History Record Clear 02/07/05

Clearance 01/14/05

WaiʻAnae Coast Community Mental Health Center Psychological Evaluation re: T [REDACTED] M [REDACTED]  
04/10/96

Adoption Review Team (ART) Worksheet 04/01/97

Clinical Psychologist report 08/07/98

Birth Certificate – T [REDACTED] M [REDACTED]

Request for Copy of Vital Statistics Record 05/09/02

Misc records: registered return receipt 05/12/08; HMSA 09/06/00; MSA 07/01/99

Psychological Evaluation 04/23/98

Permanent Plan 04/19/99

Family Court – State of Hawaii – Motion for Order Awarding Permanent Custody and Establishing a Permanent Plan; Affidavit of Lawrence Dolan; Exhibit A; Notice of Motion 04/11/97