

CAUSE NO: C4597

**IN THE MATTER OF
Kerry Morgan, Layla Morgan,
STATE
and Jessica Morgan, CHILDREN
AND CONCERNING**

**IN THE DISTRICT COURT OF
ANYPLACE COUNTY, MOCK
3RD JUDICIAL DISTRICT**

**Janet Morgan, Raymond Capa,
and Justin Rogers, RESPONDENTS**

**AFFIDAVIT IN SUPPORT OF EMERGENCY REMOVAL
AND PETITION FOR PROTECTIVE SERVICES**

I, Taylor Pitts, Investigator of the Mock State Department of Child and Family Services (DCFS) with the responsibility for this case, affirm that any allegations stated in this affidavit are within my personal knowledge and are true and correct.

The following facts show necessity for an order of emergency removal, ongoing temporary custody, and provision of protective services.

1. CHILD(REN)

Name: Kerry Morgan
DOB: 01/12/2005

Name: Layla Morgan
DOB: 03/25/2007

Name: Jessica Morgan
DOB: 05/01/2009

2. PARENTS

Names: Janet Morgan
Relationship: Mother
DOB: 05/23/1985
1245 Daniel Coving Lane
Jacksonville, Mock State 12006

Name: Raymond Capa
Relationship: Father of Kerry and Layla Morgan
DOB: Unknown
No known address

Name: Justin Rogers
Relationship: Father of Jessica Morgan
DOB: Unknown
Believed to be incarcerated

3. ALLEGATIONS

On April 2, 2015, Reporter, Kristen Gershorn, counselor at Jacksonville Elementary School, contacted DCFS to report the neglect of Kerry, Layla, and Jessica Morgan by their mother, Janet Morgan. Specifically, the girls were coming to school unkempt and hungry. Ms. Morgan was not administering Layla Morgan's seizure medication appropriately and had failed to schedule the developmental assessment recommended by the school.

Jeffery Smith, social worker of DCFS, investigated the report. He documented hazards in the home environment, confirmed the information reported, and noted that Janet Morgan was taking prescribed medication for a back injury. Neither of the fathers, Raymond Capa nor Justin Rogers, were in the home. Raymond Capa's whereabouts were unknown, and Justin Rogers is incarcerated. DCFS substantiated the report for neglect and opened the case for voluntary in-home services.

DCFS provided voluntary in-home services from April 9, 2015, through early July 2015. Janet Morgan has successfully participated and completed the program, which focused on improving home management; making the home environment safe; and ensuring the children received proper physical care, including appropriate health care services. Janet Morgan, however, had failed to attend a substance abuse assessment. DCFS was preparing to close the in-home services case when a second report was received on July 14, 2015.

In the evening of July 14, 2015, Officer Robert Henry of the Jacksonville Police Department contacted DCFS requesting emergency response. Police responded to a call concerning two men fighting with weapons at the home of Janet Morgan. Kerry Morgan and Layla Morgan were outside the home watching the fight. Janet Morgan was found incoherent in the home. She was arrested for possession of drug paraphernalia and child endangerment. Police found several bottles of oxycodone with prescription labels belonging to others and a small amount of a substance believed to be heroin. Janet Morgan was unable to provide the name of someone who could care for the children.

On July 14, 2015, Taylor Pitts met with Officer Robert Henry at the Morgan residence and confirmed the information he reported to the hotline. Taylor Pitts was not able to speak with Janet Morgan as she was being transported to the county jail.

On July 14, 2015, Taylor Pitts spoke to Angela Johnson, a neighbor of Janet Morgan. She said that, in the last 3 weeks, there has been increased activity at the Morgan home. She also said that she had seen the children wandering around the neighborhood in the evenings when there were people at the home.

On July 14, 2015, Taylor Pitts spoke with Kerry, Layla, and Jessica Morgan. The children each independently confirmed that, over the last month, Justin Rogers' former friends had returned to frequent the family home. The girls reported that there was both drinking and drug use and that Janet Morgan was using drugs to help control her back pain. Kerry Morgan stated that she would take her sisters and leave the home as they were fearful. The girls reported that, on occasion, they would receive food and temporary shelter from neighbors. They would return to their home either after everyone left or had fallen asleep.

On July 14, 2015, Taylor Pitts contacted Mary Mace, friend of the family. Mary Mace had been identified on the family safety plan that was developed during the in-home services intervention. Ms. Mace said that she had not been in touch with the family for a number of weeks and was not able to care for the children at this time.

On July 15, 2015, Taylor Pitts spoke with Angela Johnson and James Rafferty, two of Janet Morgan's closest neighbors. Ms. Johnson confirmed the information she had provided the night before. Both Ms. Johnson and Mr. Rafferty reported that they had seen the girls wandering around the neighborhood at night and had provided them food and temporary shelter.

On July 15, 2015, Taylor Pitts met with Janet Morgan at the jail. Ms. Morgan could not recall the events of the prior evening. She was managing her back pain with the medication her doctor had prescribed, but the pain was getting worse, and her doctor would not increase her medications. She ran into some of Justin Rogers' old friends. They helped her out last winter and spring to get over a rough spot, but she had not seen them for a while as they didn't like being around when the DCFS workers were coming to her home. They provided her with some medicine that they said had worked for others. Ms. Morgan said it really eased her pain. Janet Morgan said that Justin Rogers was incarcerated at Mock State Correctional Facility and that she believed that Raymond Capa was in a treatment facility in Clarksburg, Mock State.

On July 15, 2015, I contacted Good Hope and North Cedar, the two treatment facilities in Clarksburg. Raymond Capa was not at either facility.

Taylor Pitts

Investigator

Department of Child and Family Services

Affiant

SWORN TO AND SUBSCRIBED before me, the undersigned Notary Public on the 15th day of July 2015.

Eleanor Rigsbee

NOTARY PUBLIC in and for the

STATE OF MOCK STATE