

TIME RECEIVED
April 23, 2014 5:15:55 PM EDT
04-23-'14 16:59 FROM-

REMOTE CSID

DURATION
977

PAGES
41

STATUS
Received

T-055 P0001/0041 F-242

FACSIMILE TRANSMISSION

DATE: 4-23-14

PAGES: 109 (Including Cover)

TO: Governor Haley

FIRM/COMPANY: _____

FAX NO.: 803-734-5167

CLIENT/MATTER: DSS

FROM: Donna Lawless

FIRM/COMPANY: _____

IF YOU DO NOT RECEIVE ALL PAGES OF TRANSMISSION, PLEASE CALL:

864-933-6864

MESSAGE:

Please make sure the Governor receives this because it involves my child.

Thank You,
Donna Lawless

THE INFORMATION CONTAINED HEREIN IS PRIVILEGED, CONFIDENTIAL AND/OR EXEMPT FROM DISCLOSURE UNDER LAW AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH THIS TRANSMITTAL IS ADDRESSED. IF THE READER OF THIS COMMUNICATION IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPY OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL COMMUNICATION TO US AT THE ABOVE ADDRESS VIA THE POSTAL SERVICE. THANK YOU.

Noncontingent Reinforcement Log

Time/Date of NCR

[illegible]

Child Conferencing Service Plan for Donna Lawless

Date of Conferencing: 10/09/2013
 County: Pickens
 Facilitator: Bonita Holland
 Recorder: Brenda Taylor
 Name of SW: Margaret Wilmott
 Child(ren)'s Name(s): Kimmie & Amber
 Sibling Group: Yes
 Parent/Legal Guardians: James & Donna Lawless
 Main Purpose: Develop Reunification Plan

Attendance:

Name	Relationship to Children	Type of Participation
James Lawless	Father	In Person
Donna Lawless	Mother	In Person
Rosemary Lawless	Paternal Grandmother	In Person
Angelica Lawless	Sister	In Person

< br/>

Reason for DSS Involvement:
 Allegations of physical abuse.

Children's Current Living Situation/Placement:
 Foster placement together.

Family Needs and Concerns:

1. Girls are not on their schedule. 2. There is no daily structure in their lives now. 3. Transition back to the family is a big concern of the family. 4. Children's family bond is a concern. 5. Sibling's disagreements. 6. Concern that the children are receiving an allowance at their foster placement.

Safety and Positive Permanency Plan:
 DSS plan is Reunification with the family.

Next Steps/Future Plans:

October 17, 2013 @ 9:30 am Hearing (court) December 5, 2013 @ 9:30 am Merits Hearing

Is Re-conferencing a Need for this Family? Yes

Re-Conference Date: 04/04/2014

Maternal:

1. Family knows how to handle children with special needs. 2. Donna and James have completed all the necessary classes about special needs children. 3. There is a good family network of support. 4. All the family takes care of each other. 5. There is medical support. 6. Donna, James, Angelica and Rosemary live a very structured life. 7. Donna knows the special needs programs, Vocational Rehab., DDSN, and BHS (co-parents).

Paternal:

1. Family knows how to handle children with special needs. 2. Donna and James have completed all the necessary classes about special needs children. 3. There is a good family network of support. 4. All the family takes care of each other. 5. There is medical support. 6. Donna, James, Angelica and Rosemary live a very structured life. 7. Donna knows the special needs programs, Vocational Rehab., DDSN, and BHS (co-parents).

Children:**Other:**

DSS: Family works together. 2. DSS is concerned the girls daily structure is not in place now at the foster home. 2. Parents will have to reestablish expectations and daily routines once the girls return to the home. DSS is concerned the girls daily structure is not in place now at the foster home. 2. Parents will have to reestablish expectations and daily routines once the girls return to the home. 3. Girls need to be on their routine, eating, chores and study time. 3. When Kimmie and Amber return home, Donna and James will have to start the daily routine all over again.

Backup Family Plan:

Adoption would be the last resort.

Review of Worries/Impacts and Non-Negotiable Items

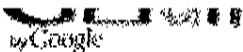
Worries	Impacts	Non-Negotiable Items
1. DSS reports no concerns with parents.	1. Parents are frustrated and confused about the accusations of abuse.	1. Both parents and children must attend Family Counseling.
2. Family concerned about Kimmie and Amber grades.	2. There will be an improvement of Kimmie and Amber grades once they are back home and on a routine schedule.	2. The family must actively participate in Behavior Support Program in the home.
3. Kimmie and Amber should be on their medication.	3. The children are showing physical signs from not being on medication. They were picking and pulling their skin as a result of not being on their medication.	3. The children (Kimmie and Amber) must participate in Individual Counseling.

Review of Hopes and Dreams

1. Family hopes Kimmie and Amber will get back on their medication so they won't regress back.	1. For Kimmie and Amber to get back on their medication.
2. Hopefully, Kimmie and Amber comes home soon.	2. Parents will establish appropriate rules, boundaries and routines for the girls before their return to the home.
3. Family hopes Kimmie and Amber do not call DSS again.	3. Parents will reassure the girls on their safety in the home upon their return.
4. Family hopes DSS will investigate more on allegations before removing children from homes.	4. Parents will implement and uphold all recommendations from the school and DSS.
5. Families wishes the girls get their act together.	5. Parents will outline and model appropriate behavior for the girls while in the home and at school.
6. DSS wishes Kimmie and Amber return home.	6. DSS has set forth guidelines and recommendations for the family to maintain the girls' safety and well-being.

Family Plan Developed During Private Family Time

Activities, Tasks, and Worries Addressed	Person Responsible for Tasks / Support Needed	Time Frame to Complete / Who Monitors
1. Worried about the girls not being on their medication.	1. Donna is responsible for keeping a track of their medication. Angelica will help Donna.	1. Ongoing/ DSS will monitor. Donna and James will monitor. < /td>
2. DSS to make periodic visits to the home once she has put the kids back in their proper school.	2. DSS is responsible for getting the children back in school. Margaret Wilmott is responsible.	2. As soon as the girls are returned home. Donna (mother) will monitor.



Re: Girls

Donna Lawless <lawless@wctel.net>

Mon, Oct 14, 2013 at 11:37 AM

Reply-To: lawless@wctel.net

To: julie@enelawfirm.com

----- Original Message -----

Subject: RE: Girls

From: "Wilmott, Margaret" <Margaret.Wilmott@dss.sc.gov>

Date: Mon, October 14, 2013 11:33 am

To: "lawless@wctel.net" <lawless@wctel.net>

Got called to reschedule for November when the girls would be home.

-----Original Message-----

From: Donna Lawless [mailto:lawless@wctel.net]

Sent: Monday, October 14, 2013 11:27 AM

To: Wilmott, Margaret

Subject: RE: Girls

I thought you said they had one Oct. 14 and 15 so he could put them back on meds...

> Nov. 14 and 15 as per Dr. office.

>

> -----Original Message-----

> From: Donna Lawless [mailto:lawless@wctel.net]

> Sent: Monday, October 14, 2013 11:09 AM

> To: Wilmott, Margaret

> Subject: Re: Girls

>

> Isn't one of the girls appt today with Dr. Shulkin? Do you know what

> time you are coming tomorrow?

>

> Thanks,

> Donna

>

>

My Affidavit Statement: Michael Shields

10/15/2013

My name is Michael shields. I am Jim and Donna Lawless's foster son. I lived with them from Nov. 2008 to July 2009. When I lived with them, I loved it there; I had a family that I could call my own. They treated me like I was their own son. We did everything together as a family. When I was there I was treated like a person, I was never hit or mistreated in any kind of way. I was never denied food they never try to force me to eat more than what I wanted. They gave me everything I wanted. They gave me money and I was always going places with friends. My mom always fought for me to have the right to be treated like a normal teenager. They never kept me isolated from anything. The Lawless family is a wonderful family, I could not ask for a better family. Even today whenever I need my foster mom all I have to do is call her and she will help me. They love me and I love them and I truly feel like I am their son. She might fuss at me and tell me I need to do better but she always does it in a kind and gentle way. I'm 21 and I still come around them they will always and forever be my family.

Thank you,



864-348-3602

Sworn to Before Me
this 15th day of October, 2013

Amy Cobb

Notary Public for South Carolina
My Commission Expires: 3-21-2015.

To whom it may concern;

September 3, 2013



This letter of character reference for Donna Lawless and Jim Lawless of Iva, South Carolina is co-written by Donna Charlene Evans, RN and Mark H Evans. We have known Donna Lawless for approximately 19 years and we have known Jim Lawless for approximately 17 years. When we first met Donna Lawless she had two young children, Angel and Adam. We saw Donna Lawless on a regular basis on which many times included every day for several years. We know from being around Donna Lawless this frequently that she did an excellent job of raising her two children Angel and Adam. At no time did we ever think that's she was not a good provider for these two children. On many occasions we allowed her to babysit our children Alan and April. When Donna Lawless married Jim, he adopted Angel and Adam and have taken excellent care of them.

Over the last few years we have observed that Donna and Jim have been excellent providers for Kim and Amber. We know that they eat well, have a regular schedules, and participate in the family activities. For example, Donna and Jim visited Walt Disney World with Amber and Kim this year for a week and also went to Dollywood together this summer. We know from visiting their house that it is always clean, and we see that they engage Kim and Amber in regular chores and house duties to help them with responsibility.

It is of our opinion as parents of three ourselves, that Donna Lawless and Jim Lawless are excellent providers of their children Kim and Amber. If further testimony is needed, please feel free to contact us.

Mark H. Evans & Donna Charlene Evans, RN

(864) 556-4786
124 Stone Drive
Anderson, SC. 29625

9/10/2013

To Whom it may Concern:

I have had the pleasure of knowing Donna and Jim for about 5 years. During the years of our acquaintance, I have known Donna in many capacities. Her children are not only provided for with daily basic needs such as food, clothing and medical needs but Donna has worked diligently trying to get help with the girls issues. She is always quick on her feet, with sensible reactions in all the circumstances I've seen her in.

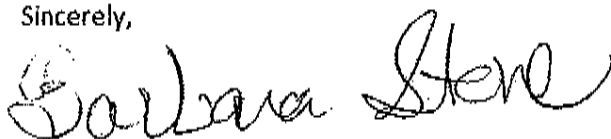
When she got the girls they couldn't even read, now they can, they couldn't tell time or give themselves a bath, they would wipe poop on the walls and potty in the floor and Amber wet the bed. They had no boundaries and would climb all over anybody who came and these are girls who were 11 and 14. They have always lied and stole since the first day they came. They told us about abuse from the previous foster home and made up stories we knew couldn't possibly be true.

Donna and Jim have corrected all these behaviors by following the advice from counselors and doctors. Personally, I felt they should have remained foster parents so they had the extra help with them but they loved the girls and wanted to make them a part of their family.

I trust Donna and Jim with my children in fact they took my 5 year old daughter on her first vacation for a week out of town to the mountains. She loves Donna and thinks of her as her Grammie. They are always doing things with the kids like fishing and swimming. She even took them to cheerleading twice a week all summer. Donna also takes the kids to the children's movie every Tuesday all summer and she does the reading program with them from the library. She tries to help the girls feel normal. I know in my heart that no one else could have helped these children like Jim and Donna have.

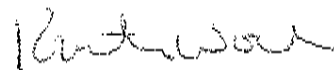
I have no idea what DSS is looking for in a good parent but Jim and Donna are examples to all us young people with small children and we all look to them for advice on how to raise our own children or if we have a problem they are always willing to help. This was an injustice to Jim and Donna and the children. They need to be returned to their parents before all their hard work was for nothing. I feel confident in saying that they are capable of handling any situation with thoughtfulness and maturity. Thank you for your time in this matter, if you have any question please contact me at 864-940-1707.

Sincerely,



Barbara Stone
Brick Mill Road
Honea Path, SC

KRISTY WOOD
Notary Public, State of South Carolina
My Commission Expires 3/14/2021



Sworn to and subscribed
before me this

10 day of Sept, 2013

Jill Owens

1499 Goddard Ave

Seneca SC 29678

September 4, 2013

To whom it may concern:

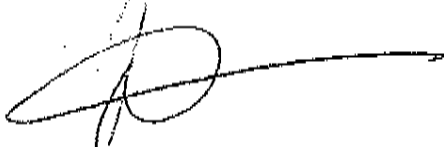
I have personally known Donna and Jim Lawless for over 10 years. Over the years I have known them; I have spent a lot of time with their family through camping trips and sleep overs. It has always been my experience that Donna and Jim are great with their kids. They are strongly family oriented and spend a lot of time with their children. I have always admired how she treats the adopted girls, Kim and Amber, the same as she did her biological children when they were growing up.

I have never witnessed either of them do anything that would be harmful or abusive to their children or anyone else's children for that matter. Donna always spends time with her children because she is a stay at home mother and she is always doing activities with them as well as taking them out for fun trips.

I trust the Lawless' with my own children. Over the summer my children stayed with her for a week. My children had a wonderful time playing with her and the girls and going swimming at the water park. She even took my daughter (along with the bigger kids) to her first movie during the week she was there.

Donna is a grandma type figure to all of the children in her life, and they all adore her. I always has the children's best interests at heart. She makes it a point to ensure that the children have a healthy balance of fun and learning. She also makes sure that she teaches her children responsibility and manners. When it is time to do chores, they do them all together as a family, each with their own task. Ultimately I feel that the girls couldn't be with a better family.

Sincerely,



Jill Owens

Sworn to and Subscribed Before Me,

This 16th Day of September, 2013

Signed: Marcia Sluder, Notary

Notary Public of South Carolina

My Commission Expires: August 11, 2018

Stephanie Tedford

201 Deer Run Court

Seneca, SC 29678

To Whom it May Concern:

9/10/2013

I meet Donna and Jim through my best friend Angelica, who is their Daughter; I have been coming to the Lawless home for about 7 years. During this time I have never witnessed them being anything but loving and kind to their children. I witnessed them with Michael their foster son and he adored them and love them very much. Their children are well mannered and taught to be respectful of others.

I have seen Kim and Amber give them a hard time and they handle it with care and firmness but never abuse. Donna is very structured with the children and keeps them on a schedule and they have supervised care 24 hours a day. I feel these children were blessed by God to have the Lawless's as their parents.

I have been around when both of the kids have lied and stolen from others. Donna will take privileges and have them write sentences. She sends them to their room if they are showing out and being disrespectful to adults. She explains to them why they are in trouble and that they cannot behave that way.

Donna and Jim are always doing things with their kids and grandkids, for instance, taking them fishing, hiking, waterparks, and up to the river. Donna does arts and crafts with them all the time and they swim in their pool. Jim is showing them how to gardening and Donna is showing them how to can what they get from the garden.

Donna and Jim have made drastic improvements with these girls over the years. I don't feel anyone else could have accomplished what they have with these girls.

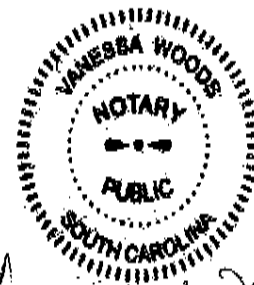
I have told Angelica that I wish my mom would have spent that kind of time with me showing me how to do stuff. I was very shocked to even here that DSS had been called on this family what a waste of taxpayers dollars. I would leave my 2 children in their care at any time I trust them fully and completely. I believe their children should be returned right away and their children should be told that they should never lie on their parents. This is only teaching the girls to lie more.

Donna and Jim have been very upset since their children have been taken from their home.

Sincerely,

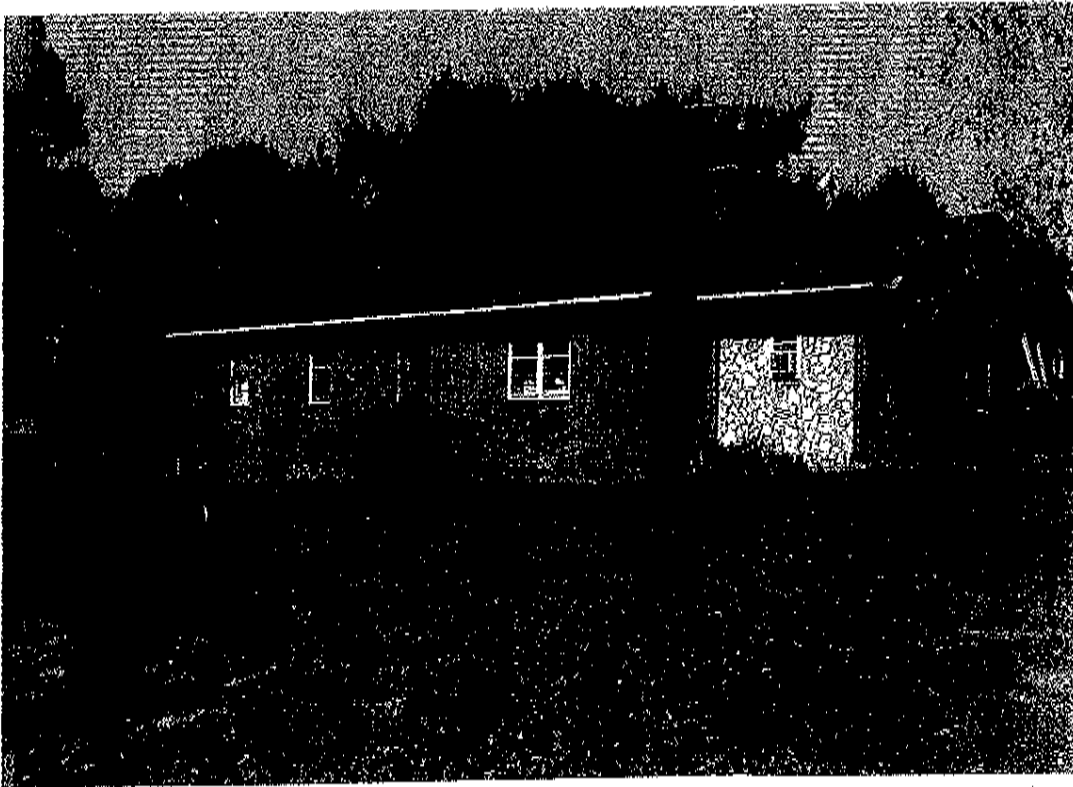
Stephanie Tedford
Stephanie Tedford

If you have any further questions you may contact me at: 864 -367-1469



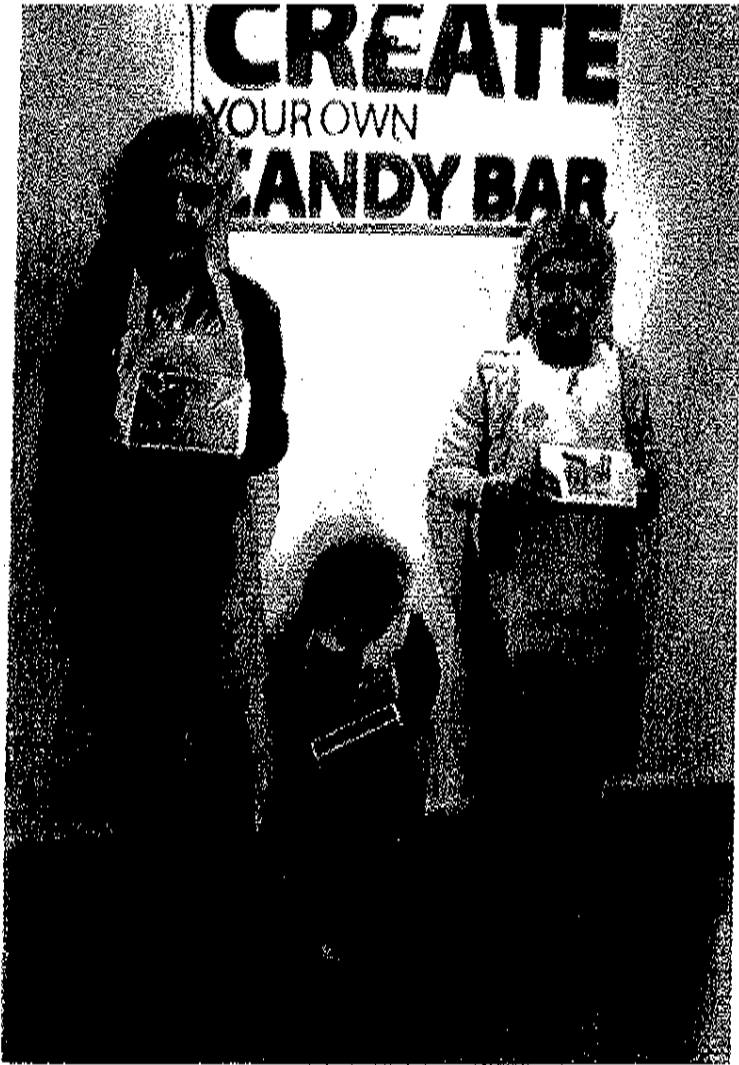
Vanessa Woods













My Affidavit Statement: Rosemary Lawless

11/08/13

I am the mother to James Lawless and Grandmother to Kimmie and Amberlee. I moved down here in January from Philadelphia, PA to help Jim and Donna with the girls so that they could have some time together alone. I have been helping with the girls ever since.

Donna and Jim went out a lot when he was off from work over the summer and it was much deserved time that they needed. I made sure the girls had their meals and supervision they needed. When they are told to go outside and play they are giving bottles of water to take with them, when they have yard work to do they are always told to take their water with them.

What these girls are saying is just plain lies. I am the one that feed them lunch most of the summer. We split up duties around the house, Angel did breakfast, I did lunch, and Donna took care of supper except on Fridays which is when I would cook supper. Kimmie and Amberlee are healthy eaters and sometimes would even over eat. Donna has a habit of always asking them if they have had enough and if they want any more to eat. Before bed she gives them some fruit or a yogurt for a snack unless they refuse it saying they are still full. These children have never been denied food or something to drink.

I have never seen anyone hit the kids with any kind of objects in fact the only one that got a spanking was Amber and it was because she went into my home without permission and took a whole box of cookies and hide behind the house and eat them all and then at first she tried to lie about it, she was told that she would only get grounded if she told the truth. Jim and Donna prefer not to spank and only do 3 licks on the bottom for stealing and lying. They ground them from TV, pool time, etc. for bad behaviors and treat them to movies, outings and special treats for good behavior. Donna and Angel are always doing stuff with the children arts and crafts, games, dancing, cooking, canning, etc... They take them to activities, cheerleading and to the movies during the summer. Jim takes them fishing sometimes also. We all go out to the lake and up to the river together for the day. In fact the whole family went to Gatlinburg, TN for the week and went to Dollywood and the indoor waterpark.

The whole family does the yard work together, and Kimmie is the one that ask to be allowed to push the mower this year because she was older so Donna talk with the doctor and he said he felt it would be fine. She was always so excited about helping. I see nothing wrong with these children doing some work it's good for them a little hard work has never killed anyone. The chores the children have takes them about 30 minutes a day unless they play around while doing them. Amber likes to poke along and play around sometimes when she is doing her chores and she tries to get Kim to do most of the work when they are doing something together.

Kim also likes to boss Amber around. There have been some episodes of Kim hitting Amber and some of Amber hitting and trying to choke Kim. Amber has also hit Lilliana my 4 year old great granddaughter who lives here too.

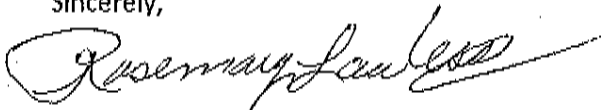
Donna and Jim have taken really good care of these children and provided them with a good home and I am very proud of my son for doing this for these girls. They have tried everything to

get these girls to stop the lying and stealing and making up stories. They have even told Donna lies and stories about me when I would babysit them trying to get me their grandmother in trouble.

I am not happy with Amber and Kim telling these lies and making up stuff because they can't get their way at home. I feel that DSS is encouraging the children to lie on their parents because every time we go to see them all they do is brag about what they are being given or what has been bought for them.

I have watched Donna cry everyday because she doesn't have her children home and she doesn't know that they are safe because of the things the girls tell her at the visits. I always thought that DSS was about keeping families together, but all they have done in this case is tear apart this family and erase all the hard work that Donna and Jim have accomplished with their girls. These girls need to be sent back home to their family who loves them so that DSS can focus on children who are really being abused. I am doing this statement because I am flying out to go visit my other children and grandchildren for the holidays and the court date is scheduled for right before Christmas, Donna and Jim told me to go they don't want my holidays ruined by all of this. If I am needed I will fly back to be in court.

Sincerely,



Rosemary Lawless

130 HH Foster Drive

Iva, SC 29655

864-933-5599

*Sworn to before me this
8th day of November 2013*

*Lisa A. Parker
Notary Public for South Carolina
My Commission Expires: 2 June 2020*

STATE OF SOUTH CAROLINA
COUNTY OF ANDERSON

South Carolina Department
of Social Services,

Plaintiff,
vs.

Donna Lawless
James Lawless

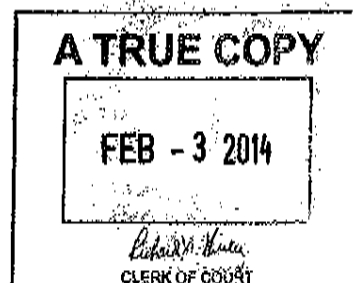
Defendant(s),

IN THE INTEREST OF:

Kimmie Lawless (7/15/1996)
Amberlee Lawless (7/8/1999)
Minor(s) Under the Age of 18

IN THE FAMILY COURT OF THE
TENTH JUDICIAL CIRCUIT
2013-DR-04-1695

ORDER FOR REMOVAL
[Agreement-Merits hearing 63-7-1660]
AND
PERMANENCY PLANNING ORDER
[Reunification]



PRESIDING JUDGE: Edgar H. Long
DATE OF HEARING: January 16, 2014
ATTORNEY FOR PLAINTIFF: Dottie C. Ingram
ANDERSON COUNTY DSS: Leann Dove
ATTORNEY FOR DONNA LAWLESS: W. Norman Epps III
ATTORNEY FOR JAMES LAWLESS: W. Norman Epps III
GUARDIAN AD LITEM: Michelle Norris
ATTORNEY FOR GUARDIAN AD LITEM: Brittany D. Tye
COURT REPORTER: Donna Brady

This matter came before me for a hearing on the merits pursuant to S. C. Code Ann. § 63-7-1660. This court has jurisdiction over the parties and the subject matter of this action. The Defendants, Donna Lawless, mother, and James Lawless, father, were properly served with the summons, complaint, notice of right to counsel, and the date, time, and place of the hearing. The children entered foster care on August 26, 2013 as a result of emergency protective custody and have been continuously in placement since

*Scanned
#1*

that date. A probable cause hearing was held on August 28, 2013 and the court's order from that hearing is in the file.

Appearances were as listed above. The following persons also were present: Kim Randolph from SCGAL; Jeff Martin and Margaret Wilmott from SCDSS.

Based upon an examination of the file, evidence presented, the recommendation of the guardian ad litem, and the agreement of the parties as set forth below, I make the following:

FINDINGS of FACT and CONCLUSIONS of LAW

1. By stipulation of the parties, the Court finds, with consent of the Defendants, Donna Lawless and James Lawless, that the evidence, if presented to the Court, would or could result in a finding of medical neglect as to the minor children, Kimmie and Amberlee Lawless, by a preponderance of the evidence by Defendants Donna Lawless and James Lawless. These findings shall bind the parties and the guardian *ad litem* to the Treatment Plan¹ with the same force and effect as if findings were entered after the presentation of evidence. The Defendants Donna Lawless and James Lawless do not admit to the abuse. For purposes of Judicial Review or Permanency Planning Hearing or for any other Family Court hearing related to the issue of abuse or neglect of these children, this Order shall be construed as containing a finding of medical neglect as to minor children. The names of Defendants Donna Lawless and James Lawless shall be entered into the Plaintiff's Central Registry of Child Abuse and Neglect. However, this finding shall not be used against the Defendant parents in any Court proceedings in the Court of General Sessions or other criminal court and to that extent is in the nature of an "Alford Plea".

¹ The Treatment Plan for Defendants Donna Lawless and James Lawless to be developed and presented to the Court within the next two (2) to three (3) weeks.

2. Retention of the children in or return of the children to the home would place the children at an unreasonable risk of harm affecting the children's life, physical health or safety, and/or mental well-being. The children cannot be protected reasonably from this harm without being removed from the home because: Defendant parents have not remedied the cause of the removal.

3. Plaintiff, as outlined in the Affidavit of Reasonable Efforts in the court file, has made reasonable efforts to prevent or eliminate the need for removal of the children from the home of the Defendants.

The following services were made available to the family before removal of the child: The Plaintiff sought alternative placement for the children. These services were appropriate and related to the needs of the family. The services were reasonably available and timely, reasonably adequate to address the needs of the family, reasonably adequate to protect the children, and realistic under the circumstances.

4. Continuation of the children in the home would be contrary to the welfare of the children and custody of the children should be granted to the Plaintiff.

5. The permanent plan for the children Kimmie and Amberlee Lawless is reunification with Defendant parents, giving consideration to the wishes of Kimmie Lawless who may elect to visit with the Defendant parents and may elect to continue a relationship with the Defendant parents to include respite care and unsupervised visitation as the Defendant parents make progress in treatment. SCDSS has made reasonable efforts to make and finalize in a timely manner the permanent plan for these children.

6. A Treatment Plan shall be developed for Defendants Donna Lawless and James Lawless with the participation of all parties. These Treatment plans shall be fair,

Sent
#3

equitable, reasonable, and in the best interests of the children. The terms of the plan shall be consistent with the findings of this order of removal. The plan shall comply with the requirements of a Placement Plan as set out in S. C. Code Ann. § 63-7-1680. SCDSS shall make reasonable efforts to secure the participation of Defendants in the development of this plan.

7. This case shall be reviewed two (2) to three (3) weeks from today's date to present the Treatment Plan for Defendants Donna Lawless and James Lawless to the Court for approval.

8. The issue of child support shall be addressed in the Treatment Plans.

9. Supervised visitation for Defendants Donna Lawless and James Lawless shall continue as previously ordered.

10. This case shall be brought to Court for review in March 2014 and June 2014 and prior to the children, Kimmie and Amberlee Lawless, returning to the home.

11. Defendants Donna Lawless and James Lawless shall be restrained from using corporal punishment.

12. The attorney for the guardian ad litem should be compensated.

THEREFORE, IT IS ORDERED that:

1. That consistent with the findings of fact in Paragraph 1, there shall be a finding of medical neglect entered as to Defendants Donna Lawless and James Lawless. The names of Defendants Donna Lawless and James Lawless shall be entered in the Central Registry of Child Abuse and Neglect.

2. Legal custody of the children shall be granted to the Plaintiff. Plaintiff shall have the authority to plan for and approve all educational plans and programs on behalf of the children and, in order to fulfill its duties under this order and federal law,

3/24/14
#4

including but not limited to the Fostering Connections to Success and Increasing Adoptions Act of 2008, and to assure that the children receive appropriate services to meet educational needs, as custodian of the children, SCDSS shall have the authority to obtain education records concerning the children. SCDSS shall also have the authority to disclose education records when disclosure is authorized or required by state or federal law. Plaintiff shall have authority to consent to routine and emergency medical care and treatment as may be required, and authority to provide such residential placement of the child as may be determined from time to time by plaintiff to be in the best interests of the child. DSS is designated as the children's personal representative as set out in the Health Insurances Portability and Accountability Act (HIPAA) regulations.

3. The Plaintiff shall be granted full and complete access to all criminal, professional, school, medical, and other records of the children and of the Defendants as may be necessary.

4. The Defendants shall timely execute any necessary releases for such records when required by providers.

5. Failure of the Defendants to remedy the conditions that caused the removal within six months may result in termination of parental rights, subject to notice and a hearing.

6. This case shall be reviewed two (2) to three (3) weeks from today's date to present the Treatment Plan for Defendants Donna Lawless and James Lawless to the Court for approval.

7. The issue of child support shall be addressed in the Treatment Plans.

8. Supervised visitation for Defendants Donna Lawless and James Lawless shall continue as previously ordered.

8/24/14
#5

9. This case shall be brought to Court for review in March 2014 and June 2014 and prior to the children, Kimmie and Amberlee Lawless, returning to the home.

10. Defendants Donna Lawless and James Lawless shall be restrained from using corporal punishment.

11. This hearing shall serve as the permanency planning hearing for the minor children. The permanent plan for the children, Kimmie and Amberlee Lawless, is reunification with Defendant parents giving consideration to the wishes of Kimmie Lawless who may elect to visit with the Defendant parents and may elect to continue a relationship with the Defendant parents to include respite care and unsupervised visitation as the Defendant parents make progress in treatment. SCDSS has made reasonable efforts to make and finalize in a timely manner the permanent plan for these children. The next permanent planning hearing shall be held within nine (9) months.

IT IS SO ORDERED.

s/Edgar H. Long

Edgar H. Long
Presiding Family Court Judge
TENTH Judicial Circuit

Dated: 1/31/14
Anderson, South Carolina

THIS COURT HAS ORDERED A PLACEMENT PLAN. IF YOU FAIL TO COMPLY, YOU COULD LOSE YOUR RIGHTS AS A PARENT.

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

South Carolina Department
of Social Services,

Plaintiff,
vs.

Donna Lawless
James Lawless

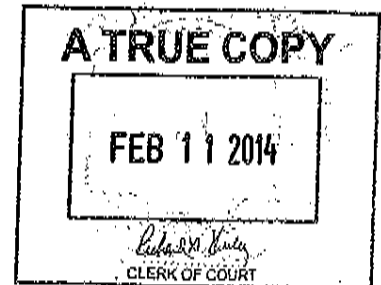
Defendant(s),

IN THE INTEREST OF:

Kimmie M Lawless (7/15/1996)
 Amberlee R Lawless (7/8/1999)
 Minor(s) Under the Age of 18

IN THE FAMILY COURT
TENTH JUDICIAL CIRCUIT
2013-DR-04-1695

**ORDER FOR JUDICIAL REVIEW
REGARDING
TREATMENT/PLACEMENT PLANS**



PRESIDING JUDGE: David E. Phillips
DATE OF HEARING: January 30, 2014
ATTORNEY FOR PLAINTIFF: Dottie C. Ingram
ANDERSON COUNTY DSS: Leann Dove
ATTORNEY FOR DONNA LAWLESS: W. Norman Epps III
ATTORNEY FOR JAMES LAWLESS: W. Norman Epps III
GUARDIAN *AD LITEM*: Michelle Norris
ATTORNEY FOR GUARDIAN *AD LITEM*: Brittany D. Tye
COURT REPORTER: Lesa Williams

This matter is before the Court for a review hearing pursuant to S.C. Code Ann. §63-7-1610(A) (Supp. 2009) for the Court to approve the Treatment/Placement Plans for Defendant parents. This court has jurisdiction over the parties and the subject matter of this action. The Defendants, Donna Lawless, mother, and James Lawless, father, were properly served with the Summons, Complaint, Notice of Right to Counsel, and the Date, Time, and Place of the Hearing.

Appearances were as listed above. Also present was Jeff Martin from ACDSS.

Based upon an examination of the file, the agreement of the parties, and the recommendation of the Guardian ad Litem, I make the following:

FINDINGS OF FACT

1. I find all parties, including the Guardian ad Litem, stated that they fully understand this agreement as to the contents of the Treatment/Placement Plan for Defendant parents and believe it to be fair, equitable, reasonable, and in the best interests of the children. Therefore, this agreement should be adopted as the order of the court.

2. I find the attached Treatment/Placement Plans, with changes agreed upon by the parties, for Defendants Donna Lawless and James Lawless are fair, equitable, reasonable, and in the best interests of the children. The terms of the plans are consistent with the findings of this order of removal. The plan complies with the requirements of a Placement Plan as set out in S. C. Code Ann. § 63-7-1680. The Defendant parents did participate in the development of these Treatment/Placements Plans.

The terms of the plan are meaningful and designed to address the facts and circumstances that are the basis for this order of removal. The number and frequency of contacts between the caseworker and the child are addressed in the plan and contacts as described in the plan are appropriate based on the needs and circumstances of this child.

3. I find all parties shall comply with the attached Treatment/Placement Plan. The terms of the plan are adopted and incorporated into this order by reference. Failure of the Defendant parents to remedy the conditions that caused the removal within six months may result in termination of parental rights, subject to notice and a hearing.

4. I find Defendant James Lawless shall pay child support through the Clerk of Court in the amount of \$926.00 per month plus Court costs of \$46.30 for a total of \$972.30

beginning February 16, 2014.

5. I find Defendant Donna Lawless shall pay child support through the Clerk of Court in the amount of \$100.00 per month plus Court costs of \$5.00 for a total of \$105.00 beginning February 16, 2014.

6. I find the attorney for the Guardian ad Litem should be compensated.

7. I find the next Judicial Review in this matter is scheduled for Thursday, March 13, 2014 at 9:30 a.m.

CONCLUSIONS OF LAW

1. Pursuant to South Carolina Code Ann., Section 63-3-530 (Supp. 2009), the Court has jurisdiction over all matters asserted and issues raised in this litigation, both pendente lite and permanently.

2. Pursuant to South Carolina Code Ann., Section 63-7-20 (Supp. 2009), as amended, an "abused or neglected child" means a child whose death results from or whose physical or mental health or welfare is harmed or threatened with harm, as defined by items (3) and (4), by the acts or omissions of the child's parent, guardian, or other person responsible for his welfare. "Child abuse or neglect" or "harm" to a child's health or welfare are defined in South Carolina Code Ann., Section 63-7-20 (Supp. 2009), subsections (3) and (4).

3. Pursuant to South Carolina Code Ann., Section 63-7-1910 (Supp. 2009), as amended, the purpose of this section is to establish a system for the identification of abused and neglected children and those who are responsible for their welfare, to provide a system for the coordination of reports concerning abused and neglected children, and to provide data for determining the incidence and prevalence of child abuse and neglect in this state.

4. Pursuant to South Carolina Code Ann., Section 63-7-1670(A) (Supp. 2009), as

amended, the purpose of this subarticle is to establish procedures for the Family Court to review and approve treatment plans.

5. Pursuant to South Carolina Code Ann., Section 63-7-1640 (Supp. 2009), as amended, the purpose of this subarticle is to determine if there should be reasonable effort to preserve or reunify family or terminate reasonable effort to preserve or reunify family.

6. Pursuant to South Carolina Code Ann., Section 63-7-1680 (Supp. 2009), as amended, the purpose of this subarticle is to establish that upon investigation of a report received under Section 63-7-930(A) or at any time during the delivery of services by the department, the department may petition the family court to remove the children from custody of the parent, guardian, or other person legally responsible for the children's welfare if the department determines by a preponderance of evidence that the children are abused or neglected children and that the children cannot be safely maintained in the home in that they cannot be protected from unreasonable risk of harm affecting the children's life, physical health, safety, or mental well-being without removal. If a noncustodial parent is not named as a party in the removal petition, the agency shall exercise every reasonable effort to promptly notify the noncustodial parent that a removal proceeding has been initiated and of the date and time of any hearings scheduled pursuant to this section.

7. Pursuant to South Carolina Code Ann., Section 63-7-1680 (Supp. 2009), as amended, the purpose of this subarticle is to establish procedures for a placement plan to be a written document prepared by the department. To the extent possible, the plan must be prepared with the participation of the parents or guardian of the children, the children, and any other agency or individual that will be required to provide services in order to implement the plan.

THEREFORE, IT IS ORDERED that:

1. All parties shall comply with the attached Treatment/Placement Plan. The terms

of the plan are adopted and incorporated into this order by reference. Failure of the Defendant parents to remedy the conditions that caused the removal within six months may result in termination of parental rights, subject to notice and a hearing.

2. Defendant James Lawless shall pay child support through the Clerk of Court in the amount of \$926.00 per month plus Court costs of \$46.30 for a total of \$972.30 beginning February 16, 2014.

3. Defendant Donna Lawless shall pay child support through the Clerk of Court in the amount of \$100.00 per month plus Court costs of \$5.00 for a total of \$105.00 beginning February 16, 2014.

4. The attorney for the Guardian ad Litem should be compensated.

5. The next Judicial Review in this matter is scheduled for Thursday, March 13, 2014 at 9:30 a.m.

IT IS SO ORDERED.

s/David E. Phillips
David E. Phillips
Presiding Family Court Judge
TENTH Judicial Circuit

Dated: 2/10/14
Anderson, South Carolina

South Carolina Department of Social Services
CHILD SUPPORT OBLIGATION: WORKSHEET A

-DR-

	Father	Mother	
1. Monthly Gross Income:	4,886	617	
2. Monthly Alimony (This Action)			
a. To Be Received:		0	
b. To Be Paid:	0		
3. a. Other Monthly Alimony Or Child Support Paid: (If Having Priority Over This Action)	0	0	
b. Adjustment For 0 Child(ren) In The Home:	[0]	[0]	
4. Adjusted Monthly Gross Income:	4,886	617	Combined Monthly Adjusted Gross Income: 5,503

Number Of Children To Be Supported In This Action: 2

5. Basic Combined Child Support Obligation (Gross): (From Schedule, Using Combined Monthly Adjusted Gross Income)	1,082		
6. Adjustment To Basic Child Support Obligation			
a. Health Insurance Premium: (Portion Covering Children Only)	105	0	
b. Children's Extraordinary Medical Expenses:	200	0	
c. Work-Related Child Care Costs Adjusted: Actual Child Care Tax Credit Method Was Used Father: Gross - \$0; Credit - \$0 Mother: Gross - \$0; Credit - \$0	0	0	
Total Adjustment To Basic Combined Child Support Obligation	305	0	305
7. Total Combined Monthly Child Support Obligation (Net):			1,387

8. Proportional Share of Combined Monthly Adjusted Gross Income:	88.8 %	11.2 %
9. Gross Child Support Obligation Of Individual Parent (Monthly):	1,231	156

The Noncustodial Parent Is The Father

10. Credit For Adjustment To Basic Combined Child Support Obligation Adjusted Gross Income:	-305
11. Net Child Support To Be Paid To Custodial Parent:	926

The Father Pays \$926 Each Month.

	<u>Without Costs</u>	<u>+ 5% Costs</u>
Monthly	926	972.30
Twice A Month	463	486.15
Every 2 Weeks	427	448.35
Weekly	214	224.70

Date: February 07, 2014

Worksheet Prepared By Dottie Ingram For

5/08P

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

DEPARTMENT OF SOCIAL SERVICES

vs.

Donna Lawless and James Lawless

Plaintiff,

Defendant.

IN THE FAMILY COURT
TENTH JUDICIAL CIRCUIT

SUPPORT INFORMATION SHEET

Docket No. 2013-DR-04-1695

Check appropriate box:

- ☐ No spousal or child support ordered. (No other items should be completed.)
- ☐ If support is ordered to be paid directly or through the Court, you must complete BOTH pages (as applicable).

Obligation Type	Child Support	Medical Support	Spousal Support
Amount	\$926	\$	\$
Collection Costs (5%)	\$46.30	\$	\$
Payment Frequency			
Payment Start Date	February 16, 2014		
Weekly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bi-weekly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Monthly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Semi-monthly (1st & 16th)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Semi-monthly (15th & 30th)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Arrearage Amount	\$	\$	\$
Wage Withholding			
Required by S.C. Code Ann. §63-17-1420	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ordered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not Ordered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Name of Custodial Parent (if applicable): _____

*****OBLIGOR'S DESIGNATION STATEMENT: PAYMENT OF COURT COSTS*****

I acknowledge that S.C. Code Ann. § 63-3-370 requires that I pay and the Family Court has ordered that I pay court costs in an amount equal to five (5) percent of any support payment made through the Clerk of Court or the centralized wage withholding system. I owe and will pay these costs in addition to my support obligation.

To meet my duty to pay court costs, I designate an amount equal to five (5) percent of the support payment I make to be applied and distributed in payment of court costs, not support.

I acknowledge the Clerk of Court or, if payments are withheld from my income, the centralized wage withholding system to deduct the fee from every payment made by me or on my behalf.

I acknowledge that should I not pay the full amount due, that an arrearage will accrue and that the Clerk of Court may take enforcement action against me for failure to pay all amounts ordered by the Court.

If an amendment to the law changes the amount of court costs, this designation authorizes deduction of court collection costs in the amount established by law.

Date: _____, 20____

Signature of Person paying Support**

****NOTE TO CLERK: FILE AND PROCESS THIS FORM EVEN IF SIGNATURE OF PERSON PAYING SUPPORT IS NOT PROVIDED.****

IDENTIFYING INFORMATION ON THIS PAGE**A. OBLIGEE/PAID TO:**

Name: SCDSS
 Address: _____
 City: _____ State: _____ Zip: _____
 Email Address: _____ Phone: _____
 SSN: _____ Gender: _____ Race: _____ Height: _____ Weight: _____
 Date of Birth: _____ Scars: _____
 Driver's License Number: _____ Driver's License Issuing State: _____
 Employer: _____
 Employer Address: _____

B. OBLIGOR/PAID BY:

Name: James Lawless
 Address: 130 HH Foster Drive
 City: Iva State: SC Zip: 29655
 Email Address: _____ Phone: _____
 SSN: _____ Gender: _____ Race: _____ Height: _____ Weight: _____
 Date of Birth: 5/2/67 Scars: _____
 Driver's License Number: _____ Driver's License Issuing State: _____
 Employer: _____
 Employer Address: _____

C. CHILDREN

CHILDREN'S NAMES	DATE OF BIRTH	SSN
1. Amberlee Lawless	7/8/99	
2. Kimmie Lawless	7/15/96	
3.		
4.		
5.		
6.		


 PREPARED BY


 TITLE


 DATE

South Carolina Department of Social Services
CHILD SUPPORT OBLIGATION: WORKSHEET A

-DR-

	Father	Mother	
1. Monthly Gross Income:	4,886	617	
2. Monthly Alimony (This Action)			
a. To Be Received:		0	
b. To Be Paid:	0		
3. a. Other Monthly Alimony Or Child Support Paid: (If Having Priority Over This Action)	0	0	
b. Adjustment For 0 Child(ren) In The Home:	[0]	[0]	
4. Adjusted Monthly Gross Income:	4,886	617	Combined Monthly Adjusted Gross Income: 5,503

Number Of Children To Be Supported In This Action: 2

5. Basic Combined Child Support Obligation (Gross): (From Schedule, Using Combined Monthly Adjusted Gross Income)	100
6. Adjustment To Basic Child Support Obligation	
a. Health Insurance Premium: (Portion Covering Children Only)	105
b. Children's Extraordinary Medical Expenses:	200
c. Work-Related Child Care Costs Adjusted: Actual Child Care Tax Credit Method Was Used Father: Gross = \$0; Credit = \$ 0 Mother: Gross = \$0; Credit = \$ 0	0
Total Adjustment To Basic Combined Child Support Obligation	305
7. Total Combined Monthly Child Support Obligation (Net):	100

8. Proportional Share of Combined Monthly Adjusted Gross Income:	00.0 %	100.0 %
9. Gross Child Support Obligation Of Individual Parent (Monthly):	0	100

The Noncustodial Parent Is The Mother

10. Credit For Adjustment To Basic Combined Child Support Obligation Adjusted Gross Income:	0
11. Net Child Support To Be Paid To Custodial Parent:	100

The Mother Pays \$100 Each Month.

	<u>Without Costs</u>	<u>+ 5% Costs</u>
Monthly	100	105.00
Twice A Month	50	52.50
Every 2 Weeks	46	48.30
Weekly	23	24.15

Date: February 07, 2014

Worksheet Prepared By Dottie Ingram For

5/068

STATE OF SOUTH CAROLINA

COUNTY OF ANDERSON

DEPARTMENT OF SOCIAL SERVICES

Plaintiff,

vs.

Donna Lawless and James Lawless

Defendant.

IN THE FAMILY COURT
TENTH JUDICIAL CIRCUIT

SUPPORT INFORMATION SHEET

Docket No. 2013-DR-04-1695

Check appropriate box:

- ☐ No spousal or child support ordered. (No other items should be completed.)
- ☐ If support is ordered to be paid directly or through the Court, you must complete BOTH pages (as applicable).

Obligation Type	Child Support	Medical Support	Spousal Support
Amount	\$100	\$	\$
Collection Costs (5%)	\$5.00	\$	\$
Payment Frequency			
Payment Start Date	February 16, 2014		
Weekly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bi-weekly	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Monthly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Semi-monthly (1st & 16th)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Semi-monthly (15th & 30th)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Arrearage Amount	\$	\$	\$
Wage Withholding			
Required by S.C. Code Ann. §63-17-1420	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ordered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Not Ordered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Name of Custodial Parent (if applicable): _____

*****OBLIGOR'S DESIGNATION STATEMENT: PAYMENT OF COURT COSTS*****

I acknowledge that S.C. Code Ann. § 63-3-370 requires that I pay and the Family Court has ordered that I pay court costs in an amount equal to five (5) percent of any support payment made through the Clerk of Court or the centralized wage withholding system. I owe and will pay these costs in addition to my support obligation.

To meet my duty to pay court costs, I designate an amount equal to five (5) percent of the support payment I make to be applied and distributed in payment of court costs, not support.

I acknowledge the Clerk of Court or, if payments are withheld from my income, the centralized wage withholding system to deduct the fee from every payment made by me or on my behalf.

I acknowledge that should I not pay the full amount due, that an arrearage will accrue and that the Clerk of Court may take enforcement action against me for failure to pay all amounts ordered by the Court.

If an amendment to the law changes the amount of court costs, this designation authorizes deduction of court collection costs in the amount established by law.

Date: _____, 20____

Signature of Person paying Support**

****NOTE TO CLERK: FILE AND PROCESS THIS FORM EVEN IF SIGNATURE OF PERSON PAYING SUPPORT IS NOT PROVIDED.****

S/DEP

IDENTIFYING INFORMATION ON THIS PAGE**A. OBLIGEE/PAID TO:**

Name: SCDSS
 Address: _____
 City: _____ State: _____ Zip: _____
 Email Address: _____ Phone: _____
 SSN: _____ Gender: _____ Race: _____ Height: _____ Weight: _____
 Date of Birth: _____ Scars: _____
 Driver's License Number: _____ Driver's License Issuing State: _____
 Employer: _____
 Employer Address: _____

B. OBLIGOR/PAID BY:

Name: Donna Lawless
 Address: 130 HH Foster Drive
 City: Iva State: SC Zip: 29655
 Email Address: _____ Phone: _____
 SSN: _____ Gender: _____ Race: _____ Height: _____ Weight: _____
 Date of Birth: 5/2/67 Scars: _____
 Driver's License Number: _____ Driver's License Issuing State: _____
 Employer: _____
 Employer Address: _____

C. CHILDREN

CHILDREN'S NAMES	DATE OF BIRTH	SSN
1. Amberlee Lawless	7/8/99	
2. Kimmie Lawless	7/15/96	
3.		
4.		
5.		
6.		


 PREPARED BY


 TITLE


 DATE

South Carolina Department of Social Services
REMOVAL HEARING PLACEMENT PLAN
Anderson County

Case Name: Donna Lawless

Docket #: 2013-DR-04- *1695*

Parents: Donna and James Lawless

Children: Kimmie Lawless 7-15-1997
 Amberlee Lawless 7-08-1999

Agency's Recommendation:

☒ Foster Care
☐ Return Home
☐ Other:

Planning:

☐ The parents/guardians have agreed to a Placement Plan with DSS that contains the terms set out below
OR

☐ The parents/guardians have not agreed to a Placement Plan. DSS took the following steps to secure participation:

The agency convened two meetings to discuss treatment recommendations for the placement plan. Participants in the development of the placement plan: Michelle Norris (GAL), Jeff Martin (FC Supv), Molly McKnight (Prog Coordinator), Crystal Sanders (Deputy Director), Dottie Ingram (DSS Attorney), Donna Lawless, James Lawless, Norman Epps (Defendants' Attorney).

DSS requests that the court issue an order approving and adopting the Placement Plan below.

NOTICE to Parents or Guardians:

If you fail to make the changes described below within six months, all of your rights to your child(ren) could be terminated.

SECTION I – Behavior Changes, Action Steps and Time Frames

- A. Behavior Change:** Mr. and Mrs. Lawless will accept responsibility for their roles in the girls' medical neglect and removal from their home, as well as demonstrate an understanding of the basis for Kimmie's diagnosis of psychosocial dwarfism (Diagnosed by Dr. Mendes). Responsibility will be demonstrated through conversation, written word (letters), compliance with medical recommendations and expressing support for Kimmie & Amberlee.

Action Steps:

- Mr. and Mrs. Lawless will each write separate clarification letters to each girl, under the guidance of his/her respective therapist, acknowledging his/her responsibility for the children entering foster care.

South Carolina Department of Social Services
REMOVAL HEARING PLACEMENT PLAN
Anderson County

- Mr. and Mrs. Lawless will meet with Dr. Mendes to review the etiology of Kimmie's diagnosis of psycho-social dwarfism and to thoroughly understand the interaction between her medications and weight loss and gain. Mr. and Mrs. Lawless will follow all recommendations of Dr. Mendes for both Kimmie and Amber.

Time frame to start and complete: by 7/22/2014

B. Behavior Change: Mr. and Mrs. Lawless will demonstrate their willingness to maintain open, honest communications with the different providers involved with their family and engage in recommendations regarding themselves as well as with instructions on effective parenting of children with cognitive delays.

Action Steps:

- Mr. and Mrs. Lawless will sign any HIPAA and release of information forms requested by the Agency so that all service providers will be able to communicate and share information to work together to meet the family's needs and provide more effective services.
- Mr. and Mrs. Lawless will participate in and complete new psychological evaluations for the purpose of exploring the possibility of any other needs the parents might have. The Agency, Mr. and Mrs. Lawless and the Guardian ad Litem will be allowed to provide any records and information to the provider completing the evaluation for background history purposes. Once the evaluations are returned and provided to all parties, Mr. and Mrs. Lawless will follow all of the recommendations of these evaluations. Mr. & Mrs. Lawless will be responsible for fees related to this service. Kimmie and Amberlee will also have new psychological evaluation completed and Mr. and Mrs. Lawless will be responsible for payment.
- Mr. and Mrs. Lawless will participate in individual counseling to ensure that they are emotionally strong enough to ensure they can meet their own personal needs and to ensure that they will make the decisions that will be best to meet their children's emotional, mental health and physical needs. Mr. & Mrs. Lawless will be responsible for fees related to this service.
- Mr. and Mrs. Lawless will participate in family therapy when the children's and parents' individual counselors find it appropriate. Mr. and Mrs. Lawless will learn to balance their treatment of the children according to their chronological age with when it is necessary to account for their delays. (i.e. excessive punishment or giving the girls allowance and helping them build independent living skills.

**South Carolina Department of Social Services
REMOVAL HEARING PLACEMENT PLAN
Anderson County**

Time frame to make substantial progress/complete: by 7/22/2014

SECTION II – SCDSS Responsibilities

Services DSS will arrange or provide the following for: Donna and James Lawless

Describe the services or referrals:

A. Family Counseling referral & case summary documentation for provider(s)

Time frame for referral or service: by February 28, 2014

B. Individual counseling referrals (if their current therapists cannot be approved) & case summary documentation for provider(s)

Time frame for referral or service: by February 28, 2014

C. Psychological Evaluation referrals & case summary documentation for providers(s)

Time frame for referral or service: by February 28, 2014

D. Monitoring and follow-up with parents, children and providers to gage progress made in services and to document consistent demonstration of behavior changes by the parents.

Time frame for referral or service: ongoing throughout life of case

NOTICE to Parents or Guardians

Completing the Action Steps will not result in the return of your child unless you also have accomplished the behavior changes outlined in Section I.

SECTION III – Rights and Obligations of the Parents or Guardian

A. Support

1. Donna and James Lawless shall pay child support of ~~\$230.00 weekly~~, plus 5% court costs, ~~weekly~~, total ~~\$241.50~~, beginning ~~the first Friday after this order is filed.~~

*Donna Lawless \$100 monthly + \$5 total \$105.00
James Lawless \$926 monthly + \$46.30 total \$972.30*

February 16, 2014

2. Donna and James Lawless shall provide a monthly clothing/necessities allowance of \$100 each for Kimmie and Amber. This allowance shall be paid by the 15th of each month to ~~DSS~~ who will then arrange for the children to purchase what they need.

Bowers-Rogers Children's Home, attn Ty Barnes

- B. Visitation will be provided as follows for the parent or guardians:** Visitation will be at the discretion of the Department. It will begin as supervised and, once service providers and the Department deem it appropriate, transitional visitation will occur.

S/DEP

**South Carolina Department of Social Services
REMOVAL HEARING PLACEMENT PLAN
Anderson County**

During visitations, no parties will discuss the details of the case, including a transition back home.

NOTICE to Parents or Guardians:

Failure to pay support or to visit as provided in this plan may result in termination of all of your rights in relation to your child(ren).

SECTION IV – Matters Related to Placement of the Child

- A. The nature and location of the child's placement is:** Children's Home
- B. Description of the educational needs of the child. Include whether the plan is for the child to remain in the school district where he/she resided before removed:**
The children were unable to be placed in the same school district from which they were removed. The school's IEP and records were transferred to their current school district.
- C. Description of visitation and contacts with siblings, relatives and other persons important to child:** Mr. and Mrs. Lawless may call at least 24 hours in advance to gain approval for other relatives to attend visitation.
- D. Description of social and other services to be provided to the child and the foster parents:** The department will continue to work closely with the provider to ensure that all of the children's needs are being met.
- E. The caseworker will meet with the child no less frequently than once per month.**

I hereby agree to Treatment/Placement Plan laid out for me by Anderson County Department of Social Services and by signing I agree that the expectations listed by the department are fair and in the best interest of my children.

Signature: _____ Date: _____

Signature: _____ Date: _____

Case Plan Prepared By: _____

Reviewing Supervisor: _____

5/06p

Stress Management
P.O. Box 1424 / 1115 Dunlap Road Anderson, SC 29622-1424
Office: 864-225-0792 / www.fernviewcenter.com

January 27, 2014

To Whom It May Concern:

Re: Donna Lawless

I am seeing Donna Lawless in individual therapy to assist her in dealing with the issues related to her adopted children being removed from the home. I see no evidence of any mental illness or personality disorder that would prevent her from safely visiting with the children alone, or from providing appropriate care for them in her home setting. Donna reports a willingness to do whatever is necessary to try to provide these children with a consistent home and family life. As she talks about the children she shows appropriate empathy for the children and verbalizes a good understanding of their needs. She shows a good awareness of the challenges of raising them. She also verbalizes a willingness to have ongoing assistance from family and behavioral therapists to assist her in learning to improve her parenting skills specific to her intellectually challenged adopted children.

I hope this is helpful in making the decision for a prompt reunification of this family.

Sincerely,



Elizabeth J. Divver, MSW
SC LISW 2319

Harry R. Diamant, DSW / Heather Kline Schaffer, LPC / Elizabeth J. Divver, MSW
Suzette Guest, LISW / Nettí J. Summer, Ph.D / Tracie Thomas, LPC