

To Whom It May Concern:

This letter is regarding the recent activities of DeColores Adoptions International (LA agency license #11817) and their representative, Lisa Pecquet Harell, and will serve as our official complaint filed with The Louisiana Department of Children & Family Services.

Acting as a Licensed Clinical Social Worker (LCSW) credentialed by the Louisiana State Board of Social Work Examiners to practice in the State of Louisiana, Mrs. Harell was responsible for conducting our State of Louisiana approved Adoption Home Study in July 2012, for the adoption of our daughter, Morgan. Morgan's adoption became final in October 2013. Morgan's birth parents (Thomas and Carol) approached us in February 2014 and asked for assistance as they were homeless and pregnant again. We decided that it was a priority to keep the natural siblings (Morgan and the new child) together and agreed to adopt this child as well. We began providing support in the form of shelter, food, transportation to and from medical visits and cell phones on February 28, 2014. Acting on behalf of DeColores Adoptions International, on or about Saturday, April 19, 2014, Mrs. Harell was responsible for secreting Thomas and Carol from the hotel in Baton Rouge that we were providing for them to an undisclosed location in New Orleans. During a phone call with Mrs. Harell on April 21, we made it unequivocally clear to Mrs. Harell that Thomas and Carol were promising the baby to two different families while receiving support from us and from the family (Daniel and Tia Sibley) Mrs. Harell had arranged to adopt the new baby at the same time. During this same phone call, we asked Mrs. Harell to have the Sibleys contact us so we could mediate a resolution that would benefit both children. Mrs. Harell stated to us at that time "it is usually the last family in that gets the baby". Even though we sought a meaningful resolution to these events, we never heard from the Sibleys. Also during this call, Mrs. Harell also stated that she would contact us on the evening of April 21 to try and work this situation out. We have yet to hear from Mrs. Harell directly. Our adoption attorney asked Mrs. Harell if we could talk with Carol prior to the baby being born she stated, "I'll give you access to Carol after the surrender documents are signed". We never spoke directly with Thomas or Carol about our support no longer being needed or wanted and Mrs. Harell actively kept us from making contact with our daughter's birth parents by not disclosing their location or phone number to us or our attorney prior to the birth. We know Mrs. Harell was made aware of the pending due date and conveyed that information to the Sibleys on or before April 21. The baby boy was delivered on April 23. It is evident in these statements and timeline of events that DeColores Adoptions International and their agent, Lisa P. Harell were intent on keeping the natural siblings apart in exchange for monetary gain when they could have done one of two things; call a timeout and assemble the parties to discuss the nature of the events and have Carol tell everyone of her plans or she could have said "no" and not be party to an adoption that is allegedly veiled in unlawful activities and would permanently keep siblings apart. DeColores and Mrs. Harell chose to do neither and instead chose to advise the Sibleys to follow through on a potentially illegal exercise in exchange for adoption fees paid to DeColores Adoptions International and subsequently to Mrs. Harell.

We have several concerns that we believe DCFS should investigate:

1. We believe there is a conflict of interest that Mrs. Harell refused to recognize in this specific event. The Home Study that is signed by Mrs. Harell was still valid and it was being used for the adoption of the natural sibling and thus, her representation either as an attorney or LCSW for two parties involved in the adoption of the same baby should excuse DeColores and Mrs. Harell from continuing with this adoption.

2. We believe that due to the sensitivity of the information contained in an Adoption Home Study, the willful act of keeping these natural siblings apart could have been perpetrated by knowing our financial status would prevent us from disputing this adoption.
3. We believe that the financial transactions that usually take place with agency adoptions may have played a role in DeColores and Mrs. Harell's decision to consciously keep these siblings apart. We were using our private adoption attorney and his staff for the adoption of our daughter's natural sibling. We had no reason to engage DeColores or their representative. If DeColores had not secreted Thomas and Carol to New Orleans during the weekend when our attorney's office was closed and four (4) days before the baby was born while intentionally kept us from contacting the birth mother, they would not receive the agency fees paid by Daniel and Tia Sibley.
4. We believe that in the exercise of monetary gain, DeColores and Mrs. Harell, in her role of legal counsel, overlooked the alleged illegal practice of unlawful enrichment by Thomas and Carol. Mrs. Harell made a comment to our adoption attorney that she was trying to keep the birth mother "out of jail". We believe DeColores and Mrs. Harell knew there were illegal activities taking place and did not report the activities to the appropriate authorities.
5. Mrs. Harell, through our adoption attorney, also threatened to file a libel lawsuit against us for voluntarily giving relevant information about the status of the placement of the baby in question to our friends and relatives. It is reasonable to believe this was an unfounded attempt to intimidate us into not pursuing these allegations and disputing this adoption with DCFS.
6. We believe that Tia Sibley has an interest in starting her own adoption agency and become licensed through DCFS. We strongly object to someone who knowingly and wantonly participated in keeping these natural siblings apart from ever being given the privilege to assist other families in the adoption process.

We are confident in these statements and have documentation in the form of support receipts and phone records as well as testimony from representatives in the referral to DeColores Adoptions International that show double dipping took place. These documents have also been turned over to the Louisiana State Police for investigation and they have been notified of this complaint.

Due to the unusual nature of the communications during the week following April 19, 2014 and the potentially illegal actions taken by the birth mother, the agency, the agency representative and Daniel and Tia Sibley, we believe DCFS should intervene and take custody of the child until the criminal investigation is complete.

Thank you for your consideration and swift action.

Sincerely,

A handwritten signature in black ink, appearing to read "Christy and Craig Mills". The signature is fluid and cursive, with the first name "Christy" being more prominent and the last name "Mills" written in a similar style.

Christy and Craig Mills  
18444 Shadow Creek Ave.  
Baton Rouge, LA 70816  
225-753-1189

DeColores Adoptions International  
2615 Paul White Road  
Lake Charles, LA 70611

Date - 09/22/2014  
License # - 11817  
Action Code - 3

### COMPLAINT NARRATIVE

Control #: 15993

**Staff interviewed:**

S1	Date: 9/22/14 & 9/23/14 & 9/2
S2	Date: 9/22/14 & 9/23/14 & 9/2
S3	Date: Sep 23, 2014

Remember: Your findings must answer the following for each allegation: Whom did you speak to; What information did you gather; When did incident/allegation occur; Where did incident/allegation occur; How was information gathered; and identify Why conclusion was reached.

**Allegation :** O5 and O6 are alleging that DeColores Adoptions pushed the adoption of C1 by O1 and O2 through with the intention of keeping the siblings apart and for monetary gain.

Remember: Your findings must answer the following for each allegation: Whom did you speak to; What information did you gather; When did incident/allegation occur; Where did incident/allegation occur; How was information gathered; and identify Why conclusion was reached.

**Findings:** Specialist reviewed the files of O1, O2, C1, O3 and O4 and interviewed S1, S2 and S3. O13 is a lawyer who handles many adoptions for families who work with DeColores. O13 does not currently contract with DeColores in the role of a Social Worker even though she is a Licensed social worker.

S1 and S2 stated to specialist that O1 and O2 had contacted S4 (a social worker in the New Orleans area who contracts with DeColores) in January 2014 to begin the process of getting approved to adopt a child. S4 had been working with O1 and O2 on gathering all information needed for an approval.

S3 had been contacted by an agency out of California (A Loving Alternative Adoption) to do an initial adoption evaluation and adoption counseling with O3 and O4. O3 had contacted this California Agency in April 2014 in order to place her unborn child up for adoption. O3 stated to S3 during their initial meeting that she had contacted O5 and O6 about the possibility of adopting this child as this couple had adopted O3's daughter who was born in 2013. O3 stated to S3 that O5 and O6 told her they were not interested in another child at this time due to it being too close to when the last child was born. S3 noted in her summary that throughout the interview O3 was very focused on re-locating to New Orleans.

At this point, O3 was told about potential adoptive parents for her baby and O3 chose to work with O1 and O2. The proper paperwork was put into motion with the California adoption agency sending a referral to DeColores since the adoption would take place in Louisiana and everyone involved lived in Louisiana. Shortly after all this was initiated is when O13 became aware that O3 was possibly working with and receiving support from O5 and O6 prior to choosing O1 and O2 as adoptive parents. It appears from documentation reviewed by specialist that O13 took seriously the allegations of O5 and O6 and tried to investigate them as best she could prior to moving forward with C1's adoption by O1 and O2. O13 stated to S1 and S2 that she and S3 both counseled O3 about the consequences she could face by purposely misleading O5 and O6 and the fact that if she changed her mind about O5 and O6 adopting C1 it may mean she would not be allowed to see her daughter who was adopted by O5 and O6. According to S3, O3 stated she knew she was "burning this bridge". S3 also stated that O3 told her "O5 and O6 don't really like me" and O3 seemed somewhat afraid of O5 and O6 even expressing interest in obtaining a restraining order against them. O3 refused to change her mind and insisted that O1 and O2 adopt C1.

Some facts that should be noted are that O3 appears to have some documented issues with being truthful. Specialist obtained copies of a hospital report dated 4/11/14 for O3 where hospital staff noted that O3 changed her story several times when speaking with different hospital staff during her 24 hour stay. Specialist also obtained copies of postings from O5's facebook page where on March 5 she posted that they had just found out that O3 was pregnant however the statement of alleged expenses O5 and O6 covered for O3 and O4 shows they began providing support in January 2014 and their letter to DCFS dated 7/31/14 states they began providing support in February 2014.

Specialist thoroughly reviewed all files associated with C1's adoption and found no evidence that O1 and O2 paid any fees above what is normally paid for an agency adoption. In fact it is documented that O1 and O2 offered to reimburse O5 and O6 for the support they had allegedly provided to O3 and O4 however O5 and O6 refused this offer. The only thing found to be deficient as far as DCFS regulations for Child Placing agencies is that O2's FBI clearance is dated 4/28/14 and according to post placement visit documentation C1 was placed in the home of O1 and O2 on 4/26/14. A deficiency regarding this was cited.

Specialist was unable to substantiate this allegation based upon information obtained during the investigation. It is unclear whether O3 simply changed her mind about O5 and O6 adopting her child or whether there was some sort of conscious deception of O5 and O6 by O3. It appears that DeColores followed proper procedures in dealing with this confusing situation.

DeColores Adoptions International  
2615 Paul White Road  
Lake Charles, LA 70611

Date - 09/22/2014  
License # - 11817  
Action Code - 3

  
Specialist Signature

10/20/14  
Date

DeColores Adoptions International  
2615 Paul White Road  
Lake Charles, LA 70611

Date - 09/22/2014  
License # - 11817  
Action Code - 3

## STAFF IDENTIFIER LIST

Staff Identifier	Staff's Name
S1	Sandy Arredondo
S2	Debbie Campbell
S3	Donna Usner

DeColores Adoptions International  
2815 Paul White Road  
Lake Charles, LA 70611

Date - 09/22/2014  
License # - 11817  
Action Code - 3

## CHILDREN'S IDENTIFIER LIST

Child Identifier	Child's Name
C1	

DeColores Adoptions International  
2615 Paul White Road  
Lake Charles, LA 70611

Date - 09/22/2014  
License # - 11817  
Action Code - 3

## OTHER IDENTIFIER LIST

Other Identifier	Identifier's Name
O1	
O2	
O3	
O4	
O5	
O6	



**Other Identifier Worksheet**

Other Identifier	Identifier's Name	Identifier's Description
O1		C1's adoptive mother
O2		C1's adoptive father
O3		C1's birth mother
O4		C1's birth father
O5		Was allegedly first working with O3 to possibly adopt C1
O6		Was allegedly first working with O3 to possibly adopt C1
O7		
O8		
O9		
O10		
O11		
O12		
O13		Attorney working with O1 and O2 in completing the adoption of C1

Department of Children and Family Services  
 Division of Programs  
 Licensing Section  
 P.O. Box 260035  
 Baton Rouge, LA 70826  
 (225) 342-9905  
 FAX: (225) 863-3168  
 www.dcfcs.la.gov



Facility Name:	DeColores Adoptions International			Phone:	337-855-7398
Physical Address:	2616 Paul White Road				
City:	Lake Charles	State:	LA	Zip Code:	70611
License Number:	11817	Action Code:	3		
Program Type:	Child Placing Agency	Previous Action Line ID:			
Subprogram Type:	Adoption Services	Deficiency Count			
License Expiration:	11/30/2014	From Previous Visit:		Action Line ID:	283153
Class Type:	A	Deficiencies Cleared:		Request Date:	9/12/2014
Anniversary:	November	Deficiencies Re-Cited:		Control #:	15993
Director:	Mrs. Sandra Arredondo	New Deficiencies:			
Census:	0	Total Deficiencies:	1		
Capacity:	0				

Specialist: Kara LaRocca 9/26/14  
 Date

Date of Inspection	Arrival Time	Departure Time	Date of Inspection	Arrival Time	Departure Time
09/22/2014	08:15 AM	03:15 PM	09/23/2014	10:00 AM	03:30 PM
09/24/2014	08:15 AM	03:15 PM	09/26/2014	08:15 AM	01:15 PM

- I hereby acknowledge the following:
- I have received the Statement of Deficiencies that was left on-site.
  - I have been informed that I must submit a Corrective Action Plan regarding correction of these deficiencies as soon as possible, but no later than ten days from receipt of this notification.
  - I understand that these deficiencies could affect the licensing status of this facility and/or place the children in danger.
  - A follow-up inspection may be conducted to determine that corrections have been made and maintained in a manner consistent with the minimum standards.
  - Revocation of a license will result in immediate loss of any federal subsidies and the department shall not accept a subsequent application for this facility or any new facility for a minimum period of two years after the effective date of revocation nor non-renewal or a minimum period of two years after all appeal rights have been exhausted, whichever is later (the disqualification period).
  - The actual names of staff members as noted throughout the Statement of Deficiencies as G1, G2, C1, C2, O1, O2, etc., were identified, discussed and provided to me during the exit interviews. [Signature] (provider to initial)
  - The exit interview with the licensing specialist consisted of a review of the deficiencies as well as consultation on how to correct and maintain compliance with the minimum standards. [Signature] (provider to initial)
  - The DCFS website contains information relating to the operation of licensed facilities and should be checked periodically for new and updated information. [Signature] (provider to initial)

[Signature]  
 Director / Director Designee Signature

9-26-14  
 Date

## Statement of Deficiencies

### 7315.A.2.a-b: Background Checks

Not Met

#### 7315.A.2.a-b:

- a. The provider shall perform a state and national criminal background check on the applicant(s) and any member of the applicant's household in accordance with the R.S. 46:51.2 for any crime enumerated under R.S. 15:587.1 and Public Law 105-89.
- b. An inquiry of the State Central Registry for members of the household 18 years of age and older shall be conducted. No person who is recorded on the State Central Registry with a valid (justified) finding of abuse or neglect of a child can reside in the home. The parent(s) and all other members of the household, 18 years of age or older, shall sign a release for a clearance with the State Central Registry. If the applicant(s) or any other adult living in the home of such applicant resided in another state within the proceeding five years, the provider shall request and obtain information from that state's child abuse and neglect registry.

#### Finding:

7315.A.2.a-b Based on record review: The provider did not obtain results from a national criminal background check on O2 prior to placement of C1 in the adoptive home. O2's FBI clearance is dated 4/28/14 and C1 was placed in the adoptive home on 4/26/14.

### GENERAL COMMENTS:

No comments noted at visit.

February 15, 2016

Angie Badeaux  
Licensing Director  
Louisiana Department of Child and Family Services  
PO Box 94065  
Baton Rouge, LA 70802

Re: DeColores Adoptions International Investigation by DCFS in September 2014  
2615 Paul White Rd.  
Lake Charles, LA 70611  
License # 11817  
Control # 15993  
Investigation date 9/22/2014  
Follow-up meeting date 12/9/2014

Ms. Badeaux,

Thank you again for meeting with us on December 9<sup>th</sup>, 2014, to follow-up on our original complaint regarding DeColores Adoptions International (DeColores). We did file a Freedom of Information Act request to gain access to the investigatory record for which we have reviewed. After gathering the remaining testimony from other state boards and conferring with additional legal resources and to assure the accuracy of our response for you and DCFS, we would like to file this letter as our formal response to the investigation conducted on September 22, 2014. First we would like to correct the record of the investigation in several areas and support these statements with our own documentation and witnesses.

- 1) Regarding DeColores' claim that we were offered a reimbursement.
  - At no time did we receive any correspondence from the Sibleys, DeColores or any of their representatives nor did our lawyer provide us with any documentation, correspondence or written offer regarding repayment of our support for the birth parents, Thomas and Carol. Our lawyer stated he would "try" to get the money back, but then later informed us (see attachment #1) that DeColores' representative, Lisa Harell, was concerned about her client's (Tia and Daniel Sibley) willingness to compromise. The reimbursement was never mentioned again in ANY subsequent conversations. Please provide us with the noted documentation that we were offered a reimbursement. We are confident that DeColores does not have any official record (letter, email, check made out to us) of an offer being made. Matter of fact, we believe and it is our opinion, the mere offer of money (from someone who DID NOT take our money in the first place) is an attempt to make this alleged illegal adoption go away and constitutes a bribe (La. R.S. 14:118 A(1)(d)) to keep us (witnesses to R.S. 14:286) from reporting the alleged selling of minor children (La. R.S. 14:286) that we were asked to participate.
- 2) Regarding DeColores knowledge of these events.
  - Prior to the adoption being made final AND DeColores' submission of the required adoption reports to DCFS, DeColores was made aware (see attachment #2, dated

July 31, 2014) of the events leading up to the filing of our complaint with DCFS. These included:

- i. Lisa Harell's dual role in representing both prospective adopting families and the ethical questions that surround the dual representation.
- ii. Thomas and Carol were receiving support from us while they were receiving support from DeColores/Sibleys.
- iii. The potential of illegal activities taking place by Thomas and Carol.
- iv. Although our names may not have been mentioned directly in the referral information provided to Lisa Harell, DeColores was made aware that we are Morgan's adoptive parents.
- v. Carol's previous adoption plan for Morgan in 2012.
- vi. These two children are natural siblings.
- vii. Lisa Harell was responsible for moving Thomas and Carol to New Orleans without our knowledge.
- viii. We actively pursued an open dialog with the Sibleys, but were denied by their representative, Lisa Harell.
- ix. Lisa Harell purposefully kept us from contacting our daughter's birth parents by refusing to give us access to Thomas and Carol.
- x. The knowledge of the pending due date.

3) Regarding DeColores' statement that they investigated this issue on their own.

- Considering what DeColores already knew about this situation from the items in #2 above prior to your investigation, it is well documented that A Loving Alternative Adoption (Cindy Simonson) submitted information about Thomas and Carol's existing support arrangements and physical location in Baton Rouge, date and location of Thomas and Carol's previous adoption and the name and physical location of their adopted daughter (Morgan) in Baton Rouge, name and contact information of the Baton Rouge Attorney who oversaw the adoption process for their daughter and the location of the Baton Rouge family who adopted their daughter prior to the referral being made. At no point between the referral being made (on or about April 3, 2014) and the time DeColores' agent secreted Thomas and Carol to New Orleans on Easter weekend (April 19, 2014) did they inquire about any of these facts. **DCFS' own child placing agency standards state, "placement of siblings as a family group is usually the preferred placement choice."** Considering a natural sibling is involved, if an "investigation" should have been done, it is at the point they came into knowing this information...not AFTER the agency's successful manipulation of these alleged illegal activities is exposed. Secondly, having these facts in hand should have raised a red flag with someone who "has been working on adoptions for over 15 years" and uses their "extensive knowledge and experience to bring expectant mothers and waiting families together" as well as holding a license for adoptions with DCFS. When talking with other adoption agencies and legal professionals, we are told a birth mother's second placement is highly scrutinized because of potential deception issues. To claim DeColores "investigated" this issue with all of these facts in front of them, we believe, should give DCFS some concern about DeColores' ability, in our opinion, to uphold the integrity of adoptions in Louisiana when they chose not to report the activities involved (potentially, RS 14:67: Theft by Deceit) to the

appropriate authorities, but in our opinion, pushed the adoption through for the “exercise of monetary gain” as our original complaint asserts.

- 4) The findings state that Tia and Daniel Sibley contacted a Social Worker in the New Orleans area in January 2014 to begin the process of getting approval to adopt a child.
  - We have witnesses with first-hand knowledge that Tia and Daniel’s adoption process was NOT started in January. During multiple discussions about our adoption of this child in February 2014, Tia Sibley revealed that their Foster Care application had been **denied** and they had not yet begun the process of the Adoption Home Study. Only during these February conversations did Tia show interest in adoption by asking to learn about our experiences and sought to speak with our Adoption Attorney (Todd Gaudin) to begin their adoption process. We accommodated their request and that is when Tia told Craig’s sister, “If they (Christy and Craig) do not want to adopt this baby, we (Tia and Daniel) would take it.” It would be reasonable to believe that DeColores is misrepresenting the timelines of the Adoption Home Study process to your investigator in an attempt to mask a failed Foster Care application that should have had a similar outcome on their Adoption Home Study since the secure home environment requirements are the same. By telling your investigator the process began in January, we believe this would create a perception that DeColores allowed for enough time to effectively complete the Adoption Home Study (January to April) and not give DCFS the impression that they hurried the legally defined (La R.S. 46:51.2) placement process through for the “exercise of monetary gain” as our original complaint asserts. As you are aware from the investigation, DeColores *was* cited for violating La R.S. 46:51.2 by placing the child with their ***adoption fee paying client*** **PRIOR** to the Adoption Home Study being complete. We believe DeColores knew placing the child with their ***adoption fee paying client*** as soon as possible would secure “the deal” with Thomas and Carol and in return allow them to collect their fees from the Sibleys.
- 5) The findings state that Donna Usner (DeColores’ Social Worker) was contacted by Cindy Simonson (A Loving Alternative Adoption in California) to do an initial adoption evaluation for the birth mother in April 2014.
  - We shared with you a recorded phone call with Ms. Simonson that was played during our December 2014 meeting with the FBI. Based on the context of the conversation, it would be reasonable to believe that Ms. Simonson’s statements about “only working with Lisa [Harell]” and having never contacted DeColores directly are correct. You will also see in an official testimony to the Louisiana Board of Social Work Examiners (see attachment #3, page 5), Ms Harell stating to State Board, “Ms. Harell was referred this birth mother from an out of state agency.” You now have two independent statements contrary to your own findings and we believe DeColores’ statements to your investigator are once again misleading to distract from the events surrounding this wrongful adoption and Lisa Harell’s true involvement in her interaction with Thomas and Carol. You will also notice in her LaBSWE response, she claimed to have never had a professional relationship with the birth mother in her testimony. Would one believe this was referring to her social work profession, since she was responding directly to our LaBSWE complaint? If so, you should then believe that the entirety of Ms. Harell’s representation (referral from Cindy Simonson, transfer from Baton Rouge (by her

case worker), placement in apartment in New Orleans, procurement of furniture, providing additional living expenses and adoption support on behalf of her clients, Tia and Daniel Sibley) of the birth parents was that of an attorney. If there is no contract between DeColores and Ms. Harell, doesn't Louisiana Adoption Law prevent the birth mother and the adopting family to be represented by the same attorney during the same adoption? To further these claims, please refer a text (see attachment #4) from Tia Sibley to Craig's sister the DAY BEFORE the baby was born where she refers to this adoption as "a private adoption". In addition to multiple occurrences of this adoption being called a "private adoption", if all of Ms. Harell's representation of the birth parents was done without a contract with DeColores AND the adopting family is expressing their knowledge that this was a private adoption, how was this adoption conducted under the Adoption Agency rules and regulations? This adoption should have fallen under the private attorney adoption laws, thus making the surrender (signed on day 3 post-partum) document you approved for the Juvenile Court null and void as a violation of CHC 1130. Please remember that one of the tenets of our complaint is DeColores participated in and Lisa Harell completed our Adoption Home Study that was being used for the second adoption and they played an opposing role to our efforts to keep the natural siblings together by directly managing the events around this adoption to their financial benefit. You will also remember that we presented you with the Consent Agreement and Order (see attachment #5) that Lisa Harell signed with the Louisiana Attorney General's office admitting to falsifying adoption related reports.

- 6) The findings state that Carol told Donna Usner that Morgan was born in 2013 and that we were not interested in adopting this child since it was so close to when the last child was born.
  - Morgan was born in 2012. This was also referenced in the letter written to DeColores (attachment #2). The reference to the 2013 birth is not Morgan. There is reason to believe that Carol could have had another child in 2013 that she is referring to and the investigator should have found this in the review of Carol's medical record. As we stated before, DeColores and Lisa Harell had ALL of Morgan's relatable information and your **standards state, "placement of siblings as a family group is usually the preferred placement choice."** Ms. Usner NEVER followed up on the information she had available to confirm the truthfulness of Carol's claim or attempt to accommodate Louisiana's stated preference for child placement.
- 7) Regarding the Facebook posting on March 5.
  - We had an open adoption plan with Thomas and Carol (as did Tia and Daniel Sibley) and thus were free to communicate with them. We did not announce each and every time we met or communicated with them and the date we found out about Carol being pregnant for the adoption in question is not germane to our complaint. Neither is the timing of how we message these activities to people who have supported us through both adoptions.
  - The fact still remains, Thomas and Carol received support from DeColores/Sibleys and from us at the same time. These activities, which DeColores claims to have investigated on their own, were not brought to the attention of law enforcement or other authorities/agencies whose responsibilities include overseeing the legality of adoptions.

- 8) The investigation states that Lisa Harell and Donna Usner counseled Carol about the consequences she could face by “purposefully misleading” us.
- We have received two official statements from Lisa Harell regarding these events and have attached them hereto for your convenience.
    - i. In the formal response to our complaint to the Louisiana Bar Association (see attachment #6), Ms. Harell states that she made sure no illegal activity took place and **made certain birth mother had mental-health counseling** and was comfortable with her decision. Additionally, contrary to Ms. Harell’s claim of conferring with our Adoption Attorney that no illegal activity took place, our Adoption Attorney gave a statement to the LSP Investigator that Thomas and Carol’s acceptance of the AMEX cards did in fact constitute “double dipping”, which our legal counsel suggests violates the Selling of Minor Children Statute (La. R.S. 14:286) by making the receipt of living expenses “unreasonable”.
    - ii. In Ms. Harell’s formal response to our complaint to the Louisiana Board of Social Work Examiners (attachment #3), she states the birth parents were not forthcoming about the adoption plan they established with us. She goes on to admit that she did not have much contact with the birth mother, **never had a relationship, professionally or otherwise, with birth mother and also admitted that her “only involvement in the adoption was as the Sibley’s attorney”**.
    - iii. The DCFS findings then makes the claim that Ms. Harell “**counseled Carol** about the consequences she could face by purposefully misleading” us.
    - iv. Additionally, in testimony to the LSP Investigator, our Adoption Attorney admitted that Lisa Harell told him she [Lisa Harell] would “keep [Carol] out of jail...”.
  - Did your specialist reach out to Ms. Harell to determine her role and validate the events that lead to the investigator’s conclusion or did she only rely on DeColores’ version of the story which conflicts with other statements provided by Ms. Harell in an official capacity? We believe that DeColores is telling DCFS something other than what Ms. Harell has testified to other parties and is hiding Ms. Harell’s actual role in this adoption (that of a private adoption attorney?). Please find an abbreviated version of all of Lisa Harell’s testified roles side-by-side for your convenience (see attachment #7).
  - We asked Lisa Harell to proctor a call with the Sibleys so we could work through this situation together. Lisa Harell did not allow the Sibleys to fulfill this request. We asked to speak with Thomas and Carol about these events and Lisa Harell told us, “I’ll give you access to Carol after the surrender documents are signed.” DeColores’ representative, Lisa Harell, continued to refuse our request to meet with Thomas and Carol and never followed through on her statement. We requested (see attachment #8) to have pictures taken of the two natural siblings and the request was ignored by both the Sibleys and Lisa Harell. We made every possible effort to address this situation before the child’s birth, immediately following the birth and before the surrender documents were signed. A reasonable person should come to the same conclusion that we did; we believe DeColores and Lisa Harell pursued monetary gain (from the payment of adoption fees by the Sibleys) by preventing us from addressing these issues directly and proceeding with the adoption without



bringing the conflicting parties together for a face-to-face meeting, refusing to present information they had on hand (i.e. Ms. Harell admitting to the knowing Thomas and Carol were not forthcoming with their previous adoption plans, see attachment #3, page 2) to the appropriate authorities for investigation or by questioning or confirming the information they were given by the facilitator, Ms. Cindy Simonson.

9) DeColores claims that Carol stated she was afraid of us.

- We do not believe this to be true and are bemused as to why this holds any consideration in an investigation about DeColores' involvement in this adoption. Because of our open adoption plan in 2012, Carol was able to reach us at any time and in February 2014, did so while agreeing to an adoption plan with us once again. Carol asked us directly to keep the siblings together and without reservation accepted our legally guided support. We provided you with nearly a dozen voicemails left by Thomas and/or Carol seeking assistance and communicating openly about their living status. These relatively few records represent a small portion of our communication. We believe DeColores is trying to deflect attention from their knowledge and involvement in this adoption by asserting a narrative that you and the FBI heard differently in our December 2014 meeting. As you will also remember from the recorded phone call, Cindy Simonson said Carol told her she was carrying raccoons, among other similar statements, and scared off one or more of her own families with additionally outrageous stories. Due to our relationship with Thomas and Carol, we can also testify to other wildly unstable stories they shared with us. We also find the exploitation of the emotional instability of a homeless mother to justify DeColores' actions in this matter to not only be appalling, but the citizens of Louisiana that DCFS is supposed to protect/represent should also have grave concern as to how your licensed facilities are conducting business when questionable situations arise.

10) Regarding your investigators review of the hospital report on April 11, 2014.

- A review of the report would have revealed several additional items.
  - i. Carol was given a thorough exam that produced an expected delivery date of April 22 as well as the health status of the child.
  - ii. Based on past medical visits to Ocshner, Ocshner should have sent the bill for the Medicaid deductible to our lawyer. The result of this is that we were paying for her medical expenses (including the April 16<sup>th</sup> visit) under the guise of keeping the natural siblings together at the same time Thomas and Carol were completing and accepting support from a competitive adoption plan with DeColores.
- Carol conveyed the Ocshner Emergency Room pregnancy assessment information to Cindy Simonson via phone on April 11<sup>th</sup>, instead of notifying us directly about her imminent delivery. This revelation sped up the process that DeColores/Lisa Harell needed to pursue to get the Sibley's Adoption Home Study in place...all the while keeping us in the dark as to Thomas and Carol's intent. Please see attachment #4 where Tia Sibleys states, she "worked on that like a crazy women".
- There is no mention of a follow-up exam on April 16<sup>th</sup> in your investigators report, which Lisa Harell was made aware of during our call with her on April 21. This information should have been found in DeColores' records, which were reviewed

by your investigator, if the necessary care was taken for complete medical records of birth mothers.

- We believe these activities also point directly to the intent to gain from duplicative support (La R.S. 14:286) making their receipt of dual support “unreasonable”.
- 11) Regarding your investigators conclusion that it is unclear whether Carol “simply changed her mind” or “whether there was some sort of conscious deception” towards us.
- YOUR investigator first noted in the report that Carol “**appears to have some documented issues with being truthful**”.
  - YOUR investigator then continues to note that Carol was counseled on the consequences of “**purposely misleading**” us.
  - YOUR investigator also included in the report, the hospital staff (Ochsner – Baton Rouge) noted that Carol “**changed her story several times** when speaking with different hospital staff during her 24 hour stay.”
  - We shared with you documentation where:
    - i. Carol lied in order to gain access to Ms. Simonson’s resources.
    - ii. Carol lied to Lisa Harell about their existing adoption plan with us.
    - iii. Carol offered her child to multiple clients of Ms. Simonson’s before being referred to DeColores.
    - iv. Carol offered her child to multiple families under Lisa Harell’s direction.
    - v. Carol possibly lied to Donna Usner about her previous pregnancy.
    - vi. Carol lied to Donna Usner about us not wanting to adopt this child to further her competing adoption plans.
    - vii. Carol’s story suddenly changed on April 21, when she was questioned about establishing dual adoption plans.
    - viii. Thomas and Carol left the hotel we were obligated to provide for another week without telling us they did not want our support any longer.
    - ix. Carol made libelous claims about us once she was caught lying to Cindy Simonson, DeColores, Donna Usner and Lisa Harell.
    - x. The hotel records we shared with you previously show Thomas and Carol accepted dual living accommodations.
    - xi. The phone records we shared with you previously show Thomas and Carol activated AMEX gift cards (in kind cash support) and additional cell phones so they could communicate with DeColores/Lisa Harell without our knowledge.
    - xii. We are now providing you with additional documentation that others involved in this situation were aware that Carol either was “**purposely misleading**” us or claimed the “birth parents were **not forthcoming**”.
    - xiii. DeColores failed to tell YOUR investigator that Carol asked Christy to attend her doctor’s visit that we arranged on April 16<sup>th</sup> and asked that we not return to pick up the Cord Blood Kit until the afternoon of April 19, which was after DeColores’ agent, Lisa Harell, made arrangements to move them to New Orleans. This is not indicative of someone changing their mind, but one of deceit and concealment. If these events alone do not point to “some sort of conscious deception”, the inclusion of the documented facts and first-hand witness in the above statements contradicting DeColores’ response to your investigation should, in our opinion, point to a clear and intentional

collusion between DeColores, their agent (Lisa Harell), and the birth parents (Thomas and Carol) for their respective of monetary gain through payment by the Sibleys.

- As we mentioned in our original complaint, should Thomas and Carol have continued with their original adoption plan; DeColores, Lisa Harell and the birth parents would not have received any monetary consideration and we believe by DeColores and Lisa Harell preventing us from discussing these events directly with the Sibleys as well as Thomas and Carol was the **only way** to secure the payment from the Sibleys within a 7 day period.

There are a few questions that we have for you regarding the investigation.

1. Why didn't the investigator interview any of the other parties mentioned in the investigation (Cindy Simonson, Sibleys, Thomas/Carol, Lisa Harell) to validate DeColores' statements?
2. What was Lisa Harell's role with DeColores if it were not as a Social Worker?
3. Who conducted the Sibley's Adoption Home Study?
4. Did the investigator review the Adoption Home Study?
5. Why wasn't Lisa's previous citation by the Louisiana Attorney General for submitting false adoption related reports included in the investigatory record?
6. Why didn't the investigator review the Affidavit of Expenses (CHC 1201) to make sure it complied with the regulations on paying for birth mother expenses?
7. Why didn't the investigator inquire about the living arrangements of a homeless couple and require the production of the 3-month apartment lease?
8. Why didn't DeColores tell your investigator they knew there was another medical visit on April 16?
9. Are your Louisiana State Licensed Adoption Agencies allowing private adoption attorneys to piggy-back on their favorable surrender and finalization guidelines so as to avoid statutes defining private attorney rules? Thus allowing private attorneys to obtain their legal fees 6 months in advance of the private attorney guidelines for finalization of an adoption.
10. Why weren't we told that an investigation was conducted after we filed our complaint with DCFS?

In addition to correcting the record, we would like to offer you some additional information pertinent to this situation.

- Our early communication regarding this specific adoption included one with Kacie Fischer at Todd Gaudin's office. She relayed to us that Thomas and Carol were seeking adoption agency support in Oklahoma City, OK. Thomas and Carol were not happy with the agency's direction to seek a homeless shelter and told Kacie that they "could get more for the baby than that". Todd told them if they can get to Baton Rouge, he would see what he could do to help them.
- During Morgan's adoption, Carol threatened to hold up the surrender if we did not pay her \$500. We soundly rejected that request under the advice from our Adoption Attorney that we not give them any cash. All of our expenses for both adoptions fall within the guidelines of the law and are auditable.
- Regarding the Hospital stay, 4/11/14, Carol called Cindy Simonson to tell her that she was in the hospital with Labor pains. Carol intentionally kept this information from us as she wanted to maintain the dual support and seek out the "better deal". If your investigator would have interviewed Cindy, this information would have also been made available for the record.

- When we talked with Lisa on April 21, 2014, she told us that she had two families originally ready to adopt Carol's child. We would like to know what the hospital staff stated to the investigator regarding the 4/11/2014 hospital visit. Was Carol changing her mind between the Sibleys and another one of Lisa's families? And was there any communication between Lisa and these families, that whoever produced the necessary money for the birth parent's support first, got the baby? If your investigator would have interviewed the Sibleys, this information could have also been made available for the record.
- While Carol was attempting to establish parallel adoption plans with other prospective families (as noted in Cindy Simonson's recorded phone call) and receiving monetary support (as shown in the hotel phone records we provided you) outside of our own commitment to Thomas and Carol, she expressed excitement about our use of the Cord Blood Registry Kit (CBR) for both of her children. After agreeing to keep the cord blood, Christy dropped off the kit on April 18<sup>th</sup>. Carol explicitly asked that we return for the completed paperwork on the CBR in the afternoon of April 19<sup>th</sup> so she could get some additional sleep. The CBR kit was left in the room when DeColores' agent picked Thomas and Carol up during the morning of April 19<sup>th</sup> and was in full view when we were asked to vacate room the following week. Why didn't DeColores' representative question the CBR kit being in the room or where/who provided the CBR kit?
- We received no notice from Carol that she had changed her mind.
- As you will see in Lisa's official response to the LaBSWE (attachment #3) and in the recorded call with Cindy Simonson, Cindy confronted Carol regarding the lies she told initially and Carol asked how we got Lisa's phone number. At this point, we believe Carol knew she was caught allegedly stealing money from us through her deception regarding our adoption plan.
- Lisa also claims in her LaBSWE (attachment #3) response that she was aware on April 21 that Thomas and Carol were also working an adoption plan with us and confronted Thomas and Carol regarding this revelation.
- We were also made aware that the Foster Care application was denied because Tia and Daniel did not have fences around their pool and one separating the pond near their home. They told Craig's sister that they would put one up to get the Adoption Home Study done and then tear it down after the Home Study was complete. Please remember, Lisa has already been cited by the Louisiana Attorney General's office for falsifying adoption related reports (Home Study reports) in the past.
- You have the ability to engage the Attorney General's office on any new information that you find in a follow-up investigation. Between LSP and the AG, you should be able to get to the bottom of this issue and find out who is really telling the truth.

Considering DCFS' unwillingness to take action on our original request to remove the child from his placement until the circumstances around this adoption could be resolved and based on ample documentation contradicting DeColores' official public statements, we are requesting that DCFS suspend DeColores' adoption agency license until a proper investigation is conducted by your office or by the Louisiana State Police and/or Attorney General's office. We are basing this request on the following items:

- DeColores claims that they investigated this on their own, but as we mentioned earlier, DeColores was made aware of many of these events prior to your investigation. In our letter (attachment #2) to Ms. Arredondo, we outlined our conversation with Lisa Harell (on April 21, 2014) and expressed to her that Thomas and Carol were taking support from both parties at the same time. Someone with the experience that DeColores claims to have, should have

been aware that Thomas and Carol's alleged actions are prosecutable. Just a few years prior, both the Tangipahoa Parish and Bossier Parish District Attorneys have successfully prosecuted birth mothers. These prosecutions were based on birth mothers soliciting and receiving adoption related support while misrepresenting to their victims the birth mother's intent not to follow through on an adoption plan. In each case, the birth mothers were prosecuted under La. R.S. 14:67 (Theft by Deceit) among other statutes. **Additionally, the Bossier Parish case involved an adoption agency in Lake Charles.** How many adoption agencies does DCFS license in Lake Charles, LA? By allowing your licensed agencies to "self-regulate" or investigate their own activities instead of turning these situations over to law enforcement, we believe this will continue to lead to abuses like the ones that we are expressing to you now.

- We are first-hand witnesses to the acquisition of the fully furnished apartment and 3 month lease in New Orleans and will testify to such under oath. Lisa Harell told us, "If you want to keep the siblings together you will have to pay the [Sibleys] back for their expenses". When inquiring about the amount they accrued, we were told directly that it was a 3 month lease that Thomas and Carol took possession on April 19<sup>th</sup> with furniture following on April 22<sup>nd</sup>. The information about the expected due date of April 22 (determined during the false labor visit to the ER on April 11 and again confirmed during the April 16 visit) and text messages we have from Tia Sibley (attachment #4) should give you the indication that each of the parties involved knew the delivery was imminent and the 3 month lease would fall outside of the legally defined 45 day limit on post-partum support (La R.S. 14:286).
- Our original complaint of profiteering should have been substantiated should the investigator been made aware that DeColores and Lisa Harell were given a detailed amount of information by Cindy Simonson (A Loving Alternative Adoption) about Thomas and Carol's previous adoption in Baton Rouge, as mentioned earlier. By DeColores and Lisa Harell not divulging this information or their knowledge of these events through our letter to Ms. Arredondo (attachment #2) to your investigator, while proceeding with this adoption, this should give DCFS serious concern about your own investigatory practices and whether your licensed agencies are being fully compliant and open with state agency investigations. This is a key element that has been left out of the investigative report.
- Along with the knowledge of Thomas and Carol's previous placement of Morgan and the recognition of DeColores' violation of R.S. 46:51.2 in this investigation and in our opinion, the false statements presented in an official DCFS investigation (Filing or maintaining false public records, R.S. 14:133), we believe this should be enough to come to the conclusion that DeColores did not comply with its responsibilities as a Louisiana licensed adoption agency and, in our opinion, placed their acquisition of adoption fees from the Sibleys above the integrity of adoptions in Louisiana. As DCFS' records already show, since 2011, DeColores has been cited over 25 times for deficiencies in following Louisiana State Law and other regulatory guidelines in connection with their adoption services. We believe that a reasonable person would conclude a pattern exists with this organization; one that holds a license for adoption agencies through DCFS. It is incumbent on DCFS to ensure their licensed entities are being held accountable and every Louisiana citizen should expect to be treated with equal respect.

Pursuant to CHC 1200 an affidavit of expenses (CHC 1201) must be submitted to DCFS for this adoption. According to several legal experts (Family Law & Adoption Law) we have consulted over the past 12 months, our expenses **MUST** be included on this document under the following

attestation in the affidavit of expenses: “*We certify that no other fees, charges, or things of value other than court costs have been given or shall be given by anyone in connection with this adoption.*” If our expenses are NOT included in the affidavit, and with your direction, the court has the right to release the affidavit for the purposes of a grand jury investigation pursuant to R.S. 14:286. Additionally, if the 3 month lease (\$750/month), secured by Lisa Harell and paid for by the Sibleys, for the apartment in New Orleans AND the furniture to fully furnish said apartment, also secured by Lisa Harell, paid for by the Sibleys and delivered on April 22, 2014 (one (1) day BEFORE the baby was born), is not included on the affidavit the court may also release the affidavit for the purposes of a grand jury investigation pursuant to R.S. 14:286. We are requesting a full review of the affidavit and apply the appropriate actions based on your findings.

Adoption fraud dominates conversations in the adoption industry and has negative affects on families across the country. We know first-hand how an alleged wrongful adoption has impacted our own lives today and will impact these two children’s lives once they are old enough to learn that a group of adults and **adoption professionals licensed by the State of Louisiana**, in our opinion, intentionally kept them from being together for the purposes of their own monetary gain. We believe agencies and facilitators are central players in controlling this epidemic; not exacerbating it. It is when agencies (and/or their representatives) take it upon themselves to control the outcome of an adoption after obvious wrongful actions are uncovered that allow unscrupulous birth mothers to continue to feed on the emotional state of innocent adoptive parents. We also believe that law abiding citizens of Louisiana would demand that license holders of this nature be held accountable for the wanton disregard of clear and obvious warning signs of alleged illegal activities taking place within their adoptions and these same citizens would want children (siblings in our case) who have no voice, to be provided with protection from human trafficking by being placed above someone’s monetary gain.

Thank you for your attention to this matter.

Sincerely,

Sheila “Christy” and Craig Mills

Cc:  
Marketa Garner-Walters  
DCFS Secretary  
P.O. Box 3776  
Baton Rouge, LA 70821

Attachments:

- |   |  |
|---|--|
| 1. Todd Gaudin email regarding compromise | 5. AG Consent and Order; Ms. Harell    |
| 2. DeColores notification letter          | 6. ODC complaint response; Ms. Harell  |
| 3. LaBSWE complaint response; Ms. Harell  | 7. Summary of Ms. Harell’s roles       |
| 4. Tia Sibley text to Craig Mills’ sister | 8. Email requesting photos of children |

**Craig Mills**

---

**From:** todd@ftglawyers.com  
**Sent:** Friday, August 22, 2014 3:52 PM  
**To:** craig.mills@cox.net  
**Subject:** RE: outline of events

No. I don't remember it that way. I don't remember the content of the FB postings but she was not happy about them as they apparently were critical of her?? and she also didn't like the effect the FB postings were having on her client's willingness to consider compromise. During the course of our many conversations, the idea of protecting her reputation came up. That led me to suggest to you that the FB postings stop out of fear that you were giving Lisa grounds for filing some kind of lawsuit to defend her reputation . . . if it came to that. I felt the FB postings were not a good idea. Why?

---

**From:** Craig Mills [mailto:craig.mills@cox.net]  
**Sent:** Friday, August 22, 2014 2:38 PM  
**To:** todd@ftglawyers.com  
**Subject:** RE: outline of events

Todd,  
 Did Lisa tell you that she should have filed a Libel suit against us for the Facebook posting?  
 Craig

*Craig M. Mills*  
*craig.mills@cox.net*

---

**From:** todd@ftglawyers.com [mailto:todd@ftglawyers.com]  
**Sent:** Wednesday, May 21, 2014 11:18 AM  
**To:** Craig Mills  
**Subject:** Re: outline of events

10-4

Sent from my LG Optimus G Pro™, an AT&T 4G LTE smartphone

----- Original message-----

**From:** Craig Mills  
**Date:** Wed, 5/21/2014 11:04 AM  
**To:** todd@ftglawyers.com;  
**Cc:** kacie@ftglawyers.com;christy.mills@cox.net;  
**Subject:**outline of events

Please find our outline of the events regarding Morgan's sibling. We will be bringing this with us to the meeting with the state police. This is just a representation of Christy's journal so we have some talking points. We will also have the journal with us for reference purposes.  
 Craig

*Craig M. Mills*  
*craig.mills@cox.net*

July 31, 2014

Sandy Arredondo  
President, DeColores Adoptions International  
2601 Paul White Road  
Lake Charles, LA 70611

Dear Ms. Arredondo:

This letter is to inform you of our intent to file an official protest with The Louisiana Department of Children & Family Services regarding the adoption that Lisa Pecquet Harell is proctoring, as an agent of DeColores Adoptions International, between Carol Griffin and Daniel and Tia Sibley.

Acting as a Licensed Clinical Social Worker (LCSW) credentialed by the Louisiana State Board of Social Work Examiners to practice in the State of Louisiana, Mrs. Harell was responsible for conducting our State of Louisiana approved Adoption Home Study in July 2012, for the adoption of our daughter, Morgan. Morgan's adoption became final in October 2013. Morgan's birth mother (Carol Griffin) approached us in February 2014 and asked for assistance as she was homeless and pregnant again. We decided that it was a priority to keep the natural siblings (Morgan and the newborn) together and agreed to adopt this child as well. We began providing support in the form of shelter, food, transportation to and from medical visits and cell phones on February 28, 2014.

Acting on behalf of DeColores Adoptions International, on or after Saturday, April 19, 2014, Mrs. Harell was responsible for secreting Carol from the hotel in Baton Rouge that we were providing for her to an undisclosed location in New Orleans. During a phone call with Mrs. Harell on April 21, we made it unmistakably clear to Mrs. Harell that Carol was promising the baby to two different families while receiving support from us as well as Daniel and Tia Sibley at the same time. During this same phone call, we asked Mrs. Harell to have the Sibleys contact us so we could mediate a resolution that would benefit both children. Mrs. Harell stated to us at that time "it is usually the last family in that gets the baby". Even though we sought a meaningful resolution to these events, we never heard from the Sibleys. Also during this call, Mrs. Harell also stated that she would contact us on the evening of April 21 to try and work this situation out. We have yet to hear from Mrs. Harell directly. Our adoption attorney asked Mrs. Harell if we could talk with Carol prior to the baby being born she stated, "I'll give you access to Carol after the surrender documents are signed". We never spoke directly with Carol about our support no longer being needed or wanted and Mrs. Harell actively kept us from making contact with our daughter's birth mother by refusing to disclose Carol's location or phone number to us or our attorney prior to the birth. We know Mrs. Harell was made aware of the pending due date and conveyed that information to the Sibleys on or before April 21.

It is reasonable to believe that in these statements and timeline of events DeColores Adoptions International and your agent, Lisa P. Harell were intent on keeping the natural siblings apart in exchange for monetary gain when you could have done one of two things; call a timeout and assemble the parties to discuss the nature of the events and have Carol tell everyone of her plans or you could have said "no" and not be party to an adoption that is allegedly veiled in unlawful activities and would permanently keep siblings apart. Your agency and Mrs. Harell chose to do neither and instead chose to advise the Sibleys to follow through on a potentially illegal exercise in exchange for adoption and legal fees.



We have several concerns that we want you to be aware of:

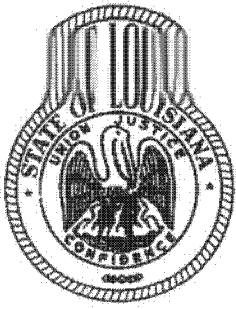
1. We believe there is a conflict of interest that Mrs. Harell refused to recognize in this specific event. The Home Study that is signed by Mrs. Harell was still valid and it was being used for the adoption of the natural sibling and thus, her representation either as an attorney or LCSW for two parties involved in the adoption of the same baby should excuse your agency as well as Mrs. Harell from continuing with this adoption.
2. We believe that due to the sensitivity of the information contained in an Adoption Home Study, the willful act of keeping these natural siblings apart could have been perpetrated by knowing our financial status would prevent us from disputing this adoption.
3. We believe that in the exercise of monetary gain, you and Mrs. Harell overlooked the alleged illegal practice of unlawful enrichment ("double dipping") by Carol Griffin. Mrs. Harell made a comment to our adoption attorney that she was trying to keep the birth mother "out of jail". We believe Mrs. Harell knew there were potentially illegal activities taking place and did not report the activities to the appropriate authorities.
4. We also believe that through a conversation with your adoption facilitator, Cindy Simonson, you too were made aware that there were potentially illegal activities taking place and you did not report these activities to the appropriate authorities.
5. Mrs. Harell, through our adoption attorney, also threatened to file a libel lawsuit against us for voluntarily giving relevant and truthful information about the status of the placement of the baby in question to our friends and relatives. It is reasonable to believe this was an unfounded attempt to intimidate us into not pursuing these allegations and disputing this adoption with DCFS.

We are confident in these statements and have documentation in the form of support receipts that overlap your support for Carol. We have phone records as well as testimony from Cindy Simonson that show double dipping did in fact take place. These documents have also been turned over to the Louisiana State Police and there is an active investigation taking place. LSP has also been notified of this correspondence.

Please be aware that complaints have been filed with the Louisiana Bar Association and the Louisiana Board of Social Work Examiners against Mrs. Harell's licenses. A previous citation against Mrs. Harell is also attached herewith. We have filed a complaint with the Louisiana Department of Child and Family Services against the license of DeColores Adoption International for not taking the appropriate due diligence with Carol Griffin in that she had completed an adoption with our attorney previously and they were receiving support in Baton Rouge in the form of room and board. Considering all of the above information, should you consider continuing this adoption, you, your agency and Mrs. Harell will be held accountable for being complicit in any and all illegal activity found by the Louisiana State Police.

Sincerely,

Christy and Craig Mills  
18444 Shadow Creek Ave.  
Baton Rouge, LA 70816  
225-753-1189



# LOUISIANA

## STATE BOARD of SOCIAL WORK EXAMINERS

December 15, 2014

Michael J. Laborde  
Jill L. Craft Attorney at Law, LLC  
509 St. Louis Street  
Baton Rouge, LA 70802

RE: File #2015-28

Dear Mr. Laborde:

I am in receipt of Lisa Harell's response to your complaint. Please review the response. You have fifteen days from the date you receive this notice to file additional documents and/or information that you feel is pertinent to the board's decision in this matter.

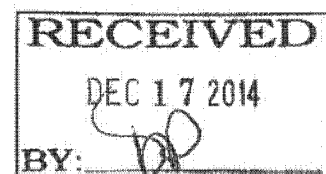
Thank you for your cooperation with this request.

Sincerely,

Emily Efferson  
Administrator

Enc

CERTIFIED MAIL #7006 0100 0002 1423 5580  
RETURN RECEIPT REQUESTED



**DANE S. CIOLINO, LLC**  
ATTORNEY AT LAW

PHONE: (504) 834-8519  
DANE@DANECIOLINO.COM

18 FARNHAM PL.  
METAIRIE, LA 70005-4008

October 31, 2014

**BY EMAIL TO: socialwork@latswe.org**

Emily Efferson  
Administrator  
Louisiana State Board of Social Work  
Examiners  
18550 Highland Road, Suite B  
Baton Rouge, LA 70809

*File No.:* 2015-28  
*Complainant:* Sheila "Christy" and Craig Mills  
*Respondent:* Lisa P. Harell, LCSW  
*Re:* Letter of Representation; Response to Complaint

Dear Ms. Efferson,

Please accept this as my letter of representation for the respondent, Lisa P. Harell, in the above-referenced matter. I would appreciate it if you would forward all future correspondence in this matter to me, preferably by email to [dane@daneciolino.com](mailto:dane@daneciolino.com).

I. *Background Information*

Lisa P. Harell is a lawyer and a Licensed Clinical Social Worker. She received her Master of Social Work degree from Tulane University School of Social Work in December of 1995, and she received her Juris Doctor degree in May of 2001, from Loyola University Law School.

The complainants, Sheila "Christy" and Craig Mills, have been involved in two adoption situations. The Mills's first adoption situation in 2012 was successful. Their second adoption situation in 2014 was not. In the Mills's first adoption in 2012, they hired Ms. Harell in July of 2012, as a social worker ("LCSW") to do a pre-placement home study report. Ms. Harell completed their pre-placement home study report on or about August 1, 2012. In 2012, the Millses hired Todd Gaudin as their lawyer for the private adoption of their daughter.

Although Ms. Harell was not involved in the Mills's first adoption after completing their home study, Ms. Harell believes that an infant girl, was placed in the Mills's home in August of

2012. Ms. Harell did not have any involvement with the birth parents during the Mills's home study process, nor did Ms. Harell provide any counseling services for the birth parents, nor was Ms. Harell involved in the hospital process once the baby was born. The Mills's never contacted Ms. Harell to do any post placement home study reports, nor did the Millses contact Ms. Harell to express any interest in adopting a second child. The Millses never contacted Ms. Harell to conduct a new pre-placement home study or update their old home study after the Millses adopted their first child.

Fast forward to 2014. In April of 2014, Ms. Harell was hired in her capacity as a lawyer by Tia and Daniel Sibley in their efforts to adopt a child from birth parents in Baton Rouge. As it turns out, the birth parents in that adoption were the same birth parents of the Mills's first adopted child from 2012. Although it was initially unknown to Ms. Harell, she later learned that the Millses had rehired Todd Gaudin as their adoption attorney and that the Millses were working a second adoption plan with the Sibleys birth parents.

Ms. Harell learned of the Millses involvement with the Sibleys prospective birth parents when she received a phone call on Monday, April 21, 2014, from the Millses. Ms. Harell was surprised in learning that the Sibley's birth parents were the Mills' historic birthparents from 2012. Ms. Harell was upset to learn that the birthparents were not forthcoming with the fact that they were working with another adopting couple before getting involved with Ms. Harell's client's, the Sibley's.

Immediately after receiving the call, Ms. Harell contacted the Mills's lawyer, Todd Gaudin, to discuss the situation. Ms. Harell also contacted the birth mother's social worker and the referring agency, to make everyone aware of the situation and to decide what steps to take. Again, Ms. Harell was the attorney for the Sibleys in this case; she was not working in her capacity as a social worker.

Ms. Simonson from the referring agency, confronted the birth mother on Tuesday, April 22, 2014, regarding her not being forthcoming about working an adoption plan with the Millses. The birth mother indicated to Ms. Simonson that she wanted to place her new baby with the Sibley family. The birth mother then listed many reasons why she stopped working with the Mills family. The birth mother's social worker also contacted the birth mother and received the same information. Ms. Harell never had any influence over the birth mother's decision to place her child for adoption, or with what family to place her child for adoption. Ms. Harell did not have much contact with the birth mother at all during the Sibley's adoption process, as the birth mother was never Ms. Harell's client; she had her own lawyer and LCSW.

On Tuesday, April 22, 2014, after speaking with Ms. Simonson, Ms. Harell informed the Sibleys that the birth mother decided to place her baby with them and not the "other couple" (Millses) the birth mother was previously working with earlier during her pregnancy. This was the birth mother's decision and right.

Ms. Harell never told the Sibleys the Mills's name. Instead Ms. Harell explained to the Sibleys that the "other couple" had previously adopted this baby's full sibling and that the "other couple" would like to meet the new baby. Initially, the Sibleys were willing to meet with the "other couple" and pursue an open relationship with them. Ms. Harell also had a discussion with the Sibleys in which the Sibleys were willing to reimburse the "other family's" adoption-related costs, which by law the Sibleys were not required to do, but in an effort to potentially foster a relationship with "the other couple" felt it was the right thing to do in this case. Before anything could be officially worked out, Carol went into labor that evening (April 22, 2014) and had the baby early Wednesday morning, April 23, 2014.

Ms. Harell, in exercising due diligence, further consulted with 3 separate LCSW's (one of whom was also a BACS) to discuss whether Ms. Harell would potentially violate any Louisiana Social Work rules, standards, or procedures or any social work rules of ethics if she were to continue to represent the Sibley family as their attorney in this matter. Further, Ms. Harell called the Louisiana social work board and briefly discussed the situation with someone at the Board office, Heather, who stated that she did not see a conflict. After discussing the matter at length with her peers, and contacting the board by phone, Ms. Harell reasonably concluded that there was no conflict and that she would not violate any standards of practice in continuing her legal representation of the Sibleys.

The Millses have erroneously directed their negative feelings about losing their second adoption towards Ms. Harell. The Millses allege throughout their complaint that Ms. Harell intentionally decided to "keep siblings apart". That is inaccurate and untrue. Ms. Harell had absolutely no control or influence over which family the birth mother ultimately decided to place her baby with. At no time was the birth mother coerced into separating her siblings. At no time did Ms. Harell have any control over the birth mother's decision. Indeed, no one other than the birth mother had any control over whether her siblings were to live together or apart.

Ms. Harell did not abuse her position of LCSW and did not violate any standards of practice set forth by Louisiana Social Work Practice Act. Ms. Harell's involvement in the Sibley adoption of 2014 was solely as the Sibley's lawyer. Ms. Harell's involvement with the Mills's first adoption in 2012, was solely as a LCSW, hired to do a home study which was completed in August of 2012. Ms. Harell was never involved with the Millses in any capacity during their second adoption situation in 2014. The Millses contacted Ms. Harell on April 21, 2014, after they feared their second adoption situation was over and unsuccessful. On that date, the Millses contacted Ms. Harell, not in Ms. Harell's capacity as LCSW, but in hopes that Ms. Harell could talk with people in the adoption community to see if their birth parents had gone to another adoption attorney or adoption agency.

Ms. Harell is unclear as to why the Millses contacted her on April 21, 2014, but it was clear that they did not contact her in a professional capacity as a LCSW or lawyer. It was later disclosed by the birth mother that the Millses were aware of the birth parents desire to move to New Orleans, but the Millses would not assist the birth parents request. This was one of the

Not  
True

reasons the birth parents were not happy with the Millses and decided not to place their second baby with them. The Millses knew that Ms. Harell's office was in New Orleans and hoped Ms. Harell through her connections as an adoption professional, could assist the Millses in locating the "missing" birth parents. Ms. Harell had not spoken to the Millses since she completed their home study in August of 2012, other than the brief phone call initiated by the Mills on April 21, 2014.

I. *1.06 Conflict of Interest and Dual Relationship*

Ms. Harell neither had a conflict of interest nor was she engaged in an improper "dual relationship." Ms. Harell was hired by the Millses in the beginning of their first adoption situation, in July of 2012, as a LCSW to complete a home study report, which she did complete. This was a non-clinical/non-therapeutic service. Once the home study was completed, Ms. Harell's services were finished. The Millses were able to accept placement of their daughter in August of 2012, and ultimately successfully adopted her with the assistance of their lawyer, Todd Gaudin.

The Mills's original pre-placement home study report was valid for the Mills to adopt one or two children under the age of 4 year old. Once the Mills adopted their daughter in 2013, their home study report expired. See La. Rev. Stat. § 67:73(F)(5). Once the Mills decided to pursue a second adoption, they should have contacted Ms. Harell, or another LCSW to provide a new home study or update their original home study.

Again, Ms. Harell was never contacted by the Millses during their second adoption process in 2014. The Millses never contacted Ms. Harell to request a new or updated home study, nor did the Millses contact Ms. Harell to discuss their second perspective adoption situation. Instead, they contacted Ms. Harell on April 21, 2014, after they feared that their adoption was unsuccessful as they lost contact with their birth parents.

In April of 2014, Ms. Harell was hired as a lawyer by the Sibley family to handle their adoption. Ms. Harell's only involvement in the Sibley's adoption was as an attorney for the Sibleys.

In February or March of 2014, unbeknownst to Ms. Harell, the Millses re-hired Todd Gaudin as their attorney in order to pursue a second adoption situation. In 2014, the Millses never contacted Ms. Harell regarding their involvement in a second adoption, until April 21, 2014, when they feared that their birthparents "disappeared", as they had lost contact with the birth parents. At that point, Ms. Harell was already hired in her capacity as an attorney for the Sibleys. The Mills did not have any standing, nor were they ever a "party" in the Sibleys adoption.

For these reasons, Ms. Harell did not have an improper "dual relationship" with the Mills family. Ms. Harell worked with them in 2012 as a LCSW. In this capacity, she completed a home

study report. That was the only relationship between Ms. Harell and the Millses. In 2014, Ms. Harell represented the Sibleys in their adoption plan as a lawyer. That was Ms. Harell's only relationship with the Sibleys.

- II. *LA RS 37:2717(7). Practicing in a manner detrimental or potentially detrimental to the client by act or omission, which act or omission is either the result of deliberate or intentional conduct or negligent conduct.*

Ms. Harell was not practicing as a LCSW in the Sibley's adoption; rather, she was hired as a lawyer for the Sibley's. Ms. Harell was never contacted or hired by the Mills in 2014 to assist them with their second adoption. Ms. Harell never treated the Millses in a manner detrimental or potentially detrimental and did not act negligently with them. Ms. Harell was referred this birth mother from an out of state agency. She did not secret the birth mother to New Orleans; the birth mother was brought to New Orleans at her own request. Once Ms. Harell learned of the Mills involvement she contacted their attorney to discuss the situation.

The birth mother's LCSW and referring agency confronted the birth mother regarding her involvement with the Millses. Ms. Harell never attempted to influence the birth mother's decision. Ms. Harell never had a relationship, professionally or otherwise, with the birth mother and had no control over the birth mother's decision. It is important to note here that the birth mother had her own attorney and LCSW, for the adoption. Ms. Harell made the birth mother's lawyer and LCSW aware of the situation. They addressed the issue with their client, the birth mother, who unequivocally told them that she wanted to place her baby with the Sibleys.

The Mills imply that Ms. Harell could use their financial information contained in their home study to determine that they could not afford to contest this adoption. The Mills's financial situation played no part into the Sibley adoption matter whatsoever. Indeed, their financial situation has no bearing on the Sibley's adoption. The Mills's do not have any standing to oppose the adoption of the new baby by the Sibley family. The only parties who have standing to oppose an adoption are the birth parents.

- III. *Deceiving or defrauding the public or making, submitting, or causing to be submitted any false or deceptive claims, reports, charges, assessments, or opinions regarding any client or service provided to any client, insurance company, health care provider, third-party payor, company, individual, or any governmental agency for the purpose of obtaining payment or anything of economic value.*

Ms. Harell is not involved in any illegal adoption proceeding. Ms. Harell is unaware that the Sibley's adoption is under criminal investigation. An "adoption" cannot be under a criminal investigation-only a person can be under criminal investigation. If a criminal investigation does exist, it would be as to the actions of the birth mother. Ms. Harell has no reason to believe that the Sibley's adoption is tainted in any way.

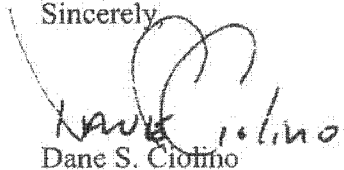
The Millses allege that the "financial transactions that usually take place in an agency adoption may have played a role" in Ms. Harell's decision to keep the siblings apart. Ms. Harell was paid her normal fee for representing prospective adopting parents. There were no "financial transactions" involving Ms. Harell other than receiving her lawful fee. Ms. Harell never had any desire or intent or control over whether the birth mother's children were placed in the same family.

The Millses allege that Ms. Harell secreted the birth parents to New Orleans when their lawyer's office was closed. Ms. Harell's case manager did assist the birth parents in moving to New Orleans at the birth parents request. At the time of the birth parent's move, Ms. Harell had no knowledge that the birth parents were involved in an adoption plan with the Mills. The Millses allege that Ms. Harell overlooked the illegal practice of dual support in favor of monetary gain. She did not. Immediately after Ms. Harell learned that both the Mills and the Sibley's were seeking to adopt the same child, she contacted the Mill's lawyer, Todd Gaudin, to make sure that there was no illegal activity occurring in the adoption. Only after Ms. Harell was satisfied that there was no dual support issue did she proceed with the adoption. It is also important to note, that had dual support occurred, Ms. Harell would have reported Carol to the proper authorities. But that issue would not affect Carol's decision to place her child for adoption with a family of her choice.

IV. *Unprofessional or unethical conduct as defined in the rules and regulations adopted by the board.*

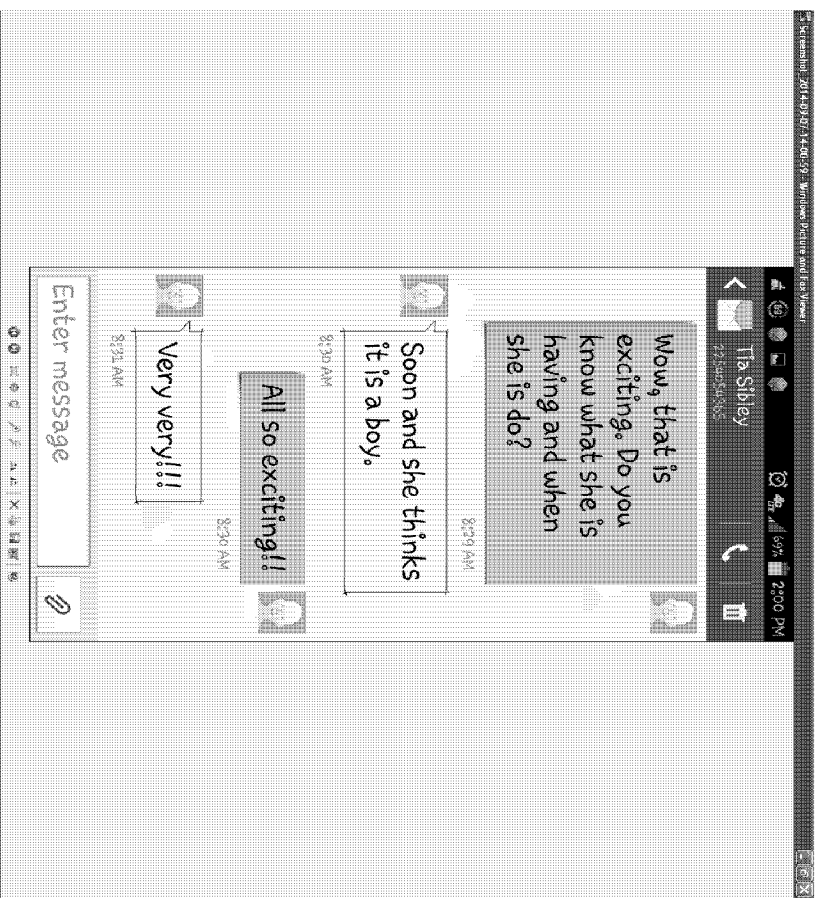
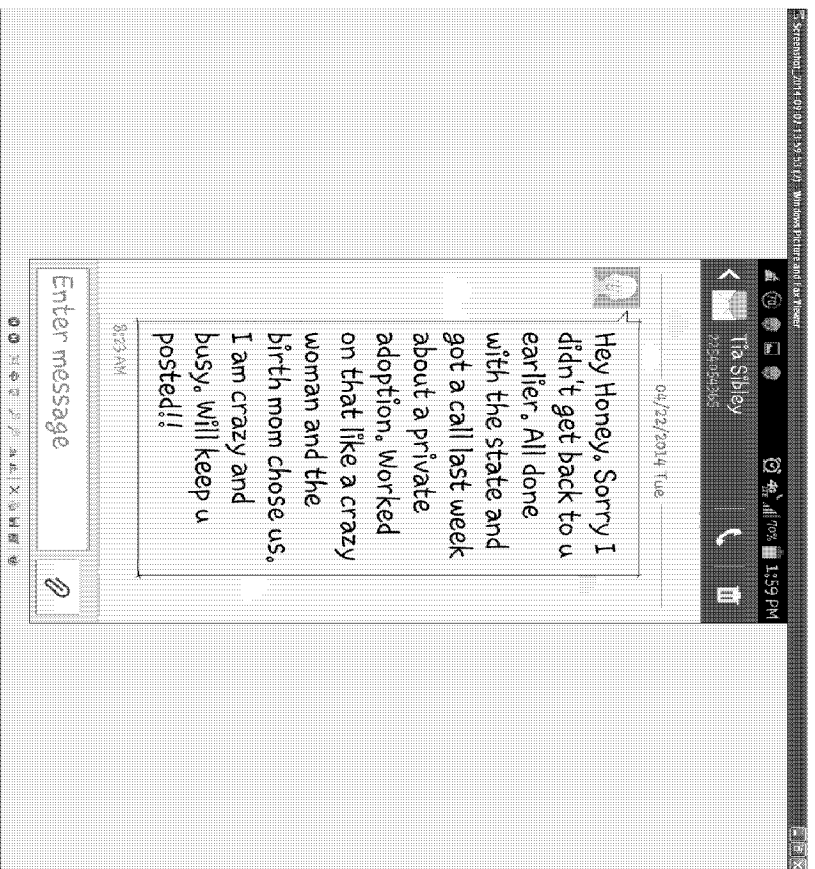
There was not any unprofessional or unethical conduct on part of Ms. Harell. Ms. Harell is honest and handles all her adoption work with integrity. Ms. Harell in her capacity as a LCSW, was hired in July of 2012, and successfully completed a home study for the Millses in 2012. Ms. Harell's services were complete. In 2014, Ms. Harell was hired by the Sibley family as a lawyer to handle their adoption. The Millses are alleging social work infractions against Ms. Harell, when she was acting in her capacity as an attorney for another client, the Sibleys. There was no breach of Ms. Harell's professional obligations.

Sincerely,

  
Dane S. Ciolino

cc: Lisa P. Harell





**LOUISIANA STATE BOARD OF  
SOCIAL WORK EXAMINERS (LABSWE)**

**IN THE MATTER OF  
LISA ANN PECQUET  
LICENSE No. 4581**

**LABSWE COMPLAINT  
NUMBER 2005-01**

**CONSENT AGREEMENT AND ORDER**

**WHEREAS**, Lisa Ann Pecquet is a credentialed social worker subject to the jurisdiction and rules and regulations of the Louisiana State Board of Social Work Examiners (the Board); and

**WHEREAS**, pursuant to a complaint and administrative investigation, the social worker, Lisa Ann Pecquet, has indicated her desire to resolve this matter through a Consent Agreement and Order as provided for in Rule No. 907 of the Board's Rules, Standards and Procedures and LA R.S. 49:955(D) of the Louisiana Administrative Procedure Act; and

**WHEREAS**, the social worker, Lisa Ann Pecquet, has admitted the following:

1. Ms. Pecquet is and at all times pertinent to the facts and matters alleged herein, a Licensed Clinical Social Worker (LCSW) credentialed by the Board to engage in the practice of social work in the State of Louisiana pursuant to the Louisiana Social Work Practice Act, LA R.S. 37:2701 et seq., as evidenced by License No. 4581.
2. At all times pertinent hereto, Ms. Pecquet was actively engaged in the practice of social work as an independent practitioner.

3. That during the time period from October 01, 2002 through October 31, 2002, Ms. Pecquet worked independently as a social worker and conducted adoption home studies for clients.
4. That Ms. Pecquet admitted to Craig Meier, Investigator for the Board, and further admits to this Board that she did not visit the home of S.L. and B.L. as she stated in the final Adoption Home Study Report, dated 10/24/02, wherein she stated that she met with the clients twice at their home on 10/12/02 and 10/15/02.
5. That Ms. Pecquet conducted the home adoption study assessment via a series of telephone interviews rather than by performing home visits as mentioned above.
6. That Ms. Pecquet admitted to Craig Meier and further admits to this Board that she did not maintain fee charges and other billing information for the required six (6) years.

**WHEREAS,** by not conducting the home visits on or about October 12, 2002 and October 15, 2002 as a social worker and stating she conducted said home visits, Ms. Pecquet has violated her professional and ethical duty as set out in Louisiana Social Work Practice Act LA R.S. 2717(A)(10), by submitting a false report.

**WHEREAS,** by not conducting the home visits on or about October 12, 2002 and October 15, 2002 as a social worker and stating she conducted said home visits, Ms. Pecquet has violated her professional and ethical duty that a

social worker shall accurately complete and submit reports as set out in Rule 111, G, 5 of the Rules, Standards and Procedures for Louisiana social workers, which action does constitute unethical conduct and pursuant to Rule 105 is a violation of LA R.S.37:2717 (A)(5) of the Louisiana Social Work Practice Act.

**WHEREAS** by not maintaining a record of fees charged and other billing information for six (6) years, Ms. Pecquet has violated her professional and ethical duty that a social worker shall maintain a record of fees charged and other billing information for six (6) years, as set out in Rule 111, G, 1 of the Rules, Standards and Procedures for Louisiana social workers, which failure does constitute unethical conduct and pursuant to Rule 105 is a violation of LA R.S.37:2717 (A)(5) of the Louisiana Social Work Practice Act.

**WHEREAS** the undersigned Assistant Attorney General has conducted an interview with the respondent who has indicated her desire to resolve this matter through this Consent Agreement and Order; and

**WHEREAS**, the credentialed social worker has indicated her desire to resolve this matter through this Consent Agreement and Order;

**IT IS HEREBY ORDERED** that in consideration of the foregoing and pursuant to the authority vested in the Board by LA R.S. 49:955(D), the Board orders and Lisa Ann Pecquet accepts the following administrative action which is a final decision pursuant to the LA R.S. 49:958:

1. That Ms. Pecquet shall complete a total of ten (10) hours of continuing education on the subjects of record keeping and ethics within one (1) year from the date that all parties sign this Consent Agreement and Order.  
This continuing education is to be pre-approved by the Board and shall be in addition to the annual twenty (20) hours of continuing education required to maintain her LCSW. Ms. Pecquet shall provide the Board with evidence of attendance within one (1) year from the date that all parties sign this Consent Agreement and Order.
2. That Ms. Pecquet shall receive monthly supervision, at her expense, for one (1) year, from the date all parties sign this Consent Agreement and Order, from a supervisor approved by the Board. The supervisor shall submit quarterly progress reports to the Board by the 15<sup>th</sup> of the month following the end of the quarter.
3. Ms. Pecquet will pay the costs of investigation in the amount of One Thousand Three Hundred Seventy-Nine and 19/100 dollars (\$1,379.19) on or before ninety (90) days from the date that all parties sign this Consent Agreement and Order.
4. Ms. Pecquet specifically acknowledges that failure to comply with the terms of this Consent Agreement and Order may result in a hearing where the Board may impose additional penalties, including but not limited to, suspension or revocation of her license. The admissions contained herein, will be considered proven and the only issue will be failure to follow the terms of this Consent Agreement and Order.

5. By agreeing to the terms of this Consent Agreement and Order, Ms. Pecquet waives all rights to appeal this adjudication.

**THIS CONSENT AGREEMENT AND ORDER** is a matter of public record for violation of the above referenced sections of the Louisiana Social Work Practice Act and the Rules, Standards and Procedures. The terms of this Consent Agreement and Order may be published and reported, including but not limited to, the LABSWE Newsletter.

**REMAINDER OF PAGE INTENTIONALLY LEFT BLANK**

IN WITNESS THEREOF, the Louisiana State Board of Social Work  
Examiners has entered into this Consent Agreement and Order and executed  
same at Baton Rouge, Louisiana on this the 28<sup>th</sup> day of  
January, 2005.

  
Joseph Bodenmiller, LCSW, Chair

  
Jacqueline R. Shellington, LCSW, Vice Chair


  
E. Taylor Aultman, Jr., LCSW, Board Member

\_\_\_\_\_  
Tina Feldt, LCSW, Board Member

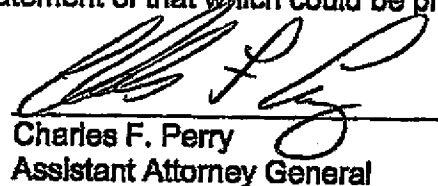
  
Robert Showers, RSW, Secretary/Treasurer

  
Jeanette Jennings, Ph.D. GSW, Board Member

I, Lisa Ann Pecquet, LCSW, do hereby acknowledge, accept and agree to entry of the above Consent Agreement and Order. My signature acknowledges my understanding that this Consent Agreement and Order is a final decision of the Board and is a public record which evidences the resolution of Complaint No. 2005-01. I hereby waive any and all legal, procedural, or judicial remedies, appeals, or relief which might be available under the Administrative Procedures Act, and the statutory and procedural rules of the Louisiana State Board of Social Work Examiners.

 1/19/05  
Lisa Ann Pecquet Date

I, Charles F. Perry, Assistant Attorney General, do hereby acknowledge negotiation and preparation of this Consent Agreement and Order in order to resolve, with prejudice, all matters for which the social worker, Lisa Ann Pecquet, could be charged under Complaint No. 2005-01; and further certify that this Consent Agreement and Order is consistent with the evidence, adequately addresses the complaint and represents a true and correct statement of that which could be proven at a hearing of this matter.

 1/19/05  
Charles F. Perry Date  
Assistant Attorney General





# LOUISIANA ATTORNEY DISCIPLINARY BOARD

## OFFICE OF THE DISCIPLINARY COUNSEL

4000 S. Sherwood Forest Blvd.

Suite 607

Baton Rouge, Louisiana 70816

(225) 293-3900 • 1-800-326-8022 • FAX (225) 293-3300

August 21, 2014

Craig & Sheila Mills  
18444 Shadow Creek Ave.  
Baton Rouge, LA 70816

RE: RESPONDENT: Lisa Pecquet Harell  
COMPLAINANT: Craig & Sheila Mills  
FILE NO.: 32030

Dear Mr. & Mrs. Mills:

We have enclosed a copy of Lisa Harell's response to your complaint. We are sending you her response in order for you to dispute any statements contained in it that you consider to be false or incorrect. Within fifteen (15) calendar days of the date of this letter, please provide us with a written reply setting out any information you have that contradicts the statements contained in Ms. Harell's response. If we do not hear from you promptly, we will assume that you have no new information to provide to this office and will proceed to make our determination of appropriate action based upon the materials currently in our possession.

Thank you for your attention to this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan C. Kalmbach".

Susan C. Kalmbach  
Deputy Disciplinary Counsel

SCK/kfl  
Enclosure

**DANE S. CIOLINO, LLC**  
ATTORNEY AT LAW

PHONE: (504) 834-8519  
DANE@DANECIOLINO.COM

18 FARNHAM PL.  
METAIRIE, LA 70005-4008

August 20, 2014

**BY EMAIL**

Susan C. Kalmbach  
Deputy Disciplinary Counsel  
Louisiana Attorney Disciplinary Board  
4000 S. Sherwood Forest Blvd., Ste. 607  
Baton Rouge, LA 70816

*ODC File No.:* 32030  
*Complainant:* Craig & Sheila Mills  
*Respondent:* Lisa P. Harell  
*Re:* Letter of Representation; Initial Response

Dear Ms. Kalmbach:

Please accept this as my letter of representation for the respondent, Lisa P. Harell, in the above-referenced matter. I would appreciate it if you would forward all future correspondence in this matter to me, preferably by email to [dane@daneciolino.com](mailto:dane@daneciolino.com).

Ms. Harell is a lawyer and licensed social worker ("LCSW"). In July of 2012, Sheila and Craig Mills, the complainants, hired Ms. Harell in her capacity as a social worker to complete a home study necessary for them to become a certified adoptive home. At the time, the Mills were pursuing through their own independent counsel, Todd Gaudin, the private adoption of a baby girl, Morgan, from birth parents Carol and Thomas ("Birth Parents"). Importantly, the Mills did not hire Ms. Harell in her capacity as a lawyer.

Ms. Harell completed the home study for the Mills in August 2012. Although she was not involved in their adoption process, Ms. Harell believes that the baby girl of the Birth Parents, Morgan, was placed with the Mills in August of 2012.

Fast forward to 2014. In April 2014, Ms. Harell began to assist Tia and Daniel Sibley in their efforts to adopt a child from birth parents in Baton Rouge. As it turns out, the birth parents were the Birth Parents of the Mills's adopted child, Morgan. Although it was initially unbeknownst to her, Ms. Harell later learned that the Mills were also seeking to adopt that new

child. Ms. Harell came to learn this through conversations with the Mills and their lawyer, Todd Gaudin.

The Mills allege that Ms. Harell had a conflict of interest because she assisted them as a social worker in 2012 and later represented the Sibleys as a lawyer in 2014. This did not present a conflict of interest. Although Ms. Harell served the Mills as a social worker, she never “represented” them in that capacity or as a lawyer. On the contrary, the Mills were always represented by their own lawyer, Todd Gaudin. Ms. Harell simply completed a home study for the Mills first adoption and was paid for her social-work services. She was not thereafter involved in the adoption process with Todd Gaudin’s office, and never had any information regarding the Birth Parents.

Although the Mills are upset that Ms. Harell’s subsequent clients, the Sibleys, adopted another child from the Birth Parents, Ms. Harell did nothing to keep siblings apart, or to influence the Birth Parents to reject the Mills. The Birth Parents have the sole right to select an adoptive family. When Ms. Harell learned that the Mills were involved in the 2014 adoption matter, she immediately contacted their lawyer to insure that there was no wrongdoing on the part of the Birth Parents and to work toward the best outcome under the circumstances. She made certain that the birth mother had mental-health counseling and was comfortable with her decision as to where she wanted her child placed. Finally, the birth mother had independent counsel to advise her of her rights with regard to giving up this child for adoption. At no time was the birth mother coerced into separating her siblings. At no time did Ms. Harell have any control over the birth mother’s decision. Indeed, no one other than the birth mother had any control over whether these siblings were to live together or apart.

The Mills allege that Ms. Harell’s knowledge of their financial situation prevented them from protesting this adoption. In fact, the Mills’ financial situation played no part into the adoption matter whatsoever.

The Mills allege that the “financial transactions that usually take place in agency adoptions may have played a role” in Ms. Harell’s decision to keep the siblings apart. Ms. Harell was paid her normal fee for representing prospective adoptive parents. There were no “financial transactions” involving Ms. Harell other than receiving her lawful fees.

The Mills alleged that Ms. Harell secreted the Birth Parents to New Orleans when their lawyer’s office was closed. Ms. Harell’s case manger did assist the Birth Parents in their move from Baton Rouge to New Orleans. At the time, Ms. Harell had no knowledge that the Birth Parents were talking with the Mills.

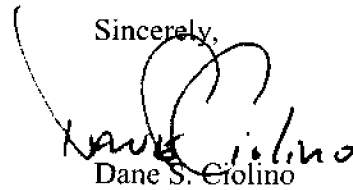
The Mills allege that Ms. Harell overlooked the illegal practice of dual support in favor of monetary gain. Quite the contrary. Immediately after Ms. Harell learned that both the Mills and the Sibleys were seeking to adopt the Birth Parents’ child, she contacted the Mills’s lawyer, Todd

Gaudin, to make certain that there was no illegal activity occurring in the adoption. Only after she was satisfied that there was no dual-support issue did she proceed with the adoption.

Finally, the Mills allege that Ms. Harell threatened them with a libel suit. She did not.

For these reasons, Ms. Harell committed no professional misconduct and your file should be closed. If, however, you need additional information to complete your evaluation of this complaint, please let me know and I will get it to you immediately.

Sincerely,

A handwritten signature in black ink, appearing to read "Dane S. Ciolino". The signature is stylized with a large, looping initial "D" and "C".

Dane S. Ciolino

cc: Lisa P. Harell

**Keri F. Lewis**

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**From:** Susan Kalmbach  
**Sent:** Wednesday, August 20, 2014 11:34 AM  
**To:** Keri F. Lewis  
**Subject:** FW: Emailing: 2014-08-20 Harell Initial Response to Complaint  
**Attachments:** 2014-08-20 Harell Initial Response to Complaint.pdf

Would you please print, scan, and process. Thx!

**From:** Dane S. Ciolino [<mailto:dane@daneciolino.com>]  
**Sent:** Wednesday, August 20, 2014 11:29 AM  
**To:** Susan Kalmbach  
**Subject:** Emailing: 2014-08-20 Harell Initial Response to Complaint

ODC File No.: 32030  
Complainant: Craig & Sheila Mills  
Respondent: Lisa P. Harell  
Re: Letter of Representation; Initial Response

Susan,

Please see attached letter of rep and initial response for Lisa Harell. Please let me know if you need anything else to screen this and I'll get it to you asap.

Thanks  
Dane  
Dane S. Ciolino  
M: (504) 975-3263  
[www.daneciolino.com](http://www.daneciolino.com)  
[www.lalegaletics.org](http://www.lalegaletics.org)

Lisa's responses to ODC and LABSWE and the DCFS investigation side-by-side:

	LBA/ODC	LABSWE	DCFS
Lisa's statements regarding potentially illegal activity	<b>Made certain no illegal activity occurred.</b>	<ul style="list-style-type: none"> <li>- Birthparents were not forthcoming</li> <li>- no reason to believe that the Sibley's adoption was tainted</li> </ul>	- cited for violation of RS 46:51.2
Lisa's role in adoption	Made certain birth mother had mental-health counseling and was <b>comfortable with her decision</b>	<ul style="list-style-type: none"> <li>- did not have much contact with birth mother</li> <li>- <b>never had a relationship, professionally or otherwise, with birth mother.</b></li> </ul>	- handles many adoptions for families who work with DeColores
Lisa's role with birth parents	Lisa's case manager assisted the birth parents in moving to New Orleans	<ul style="list-style-type: none"> <li>- <b>Only involvement in the adoption was as the Sibley's attorney</b></li> <li>- Lisa's case manager did assist the birth parents in moving to New Orleans</li> </ul>	- <b>counseled Carol</b> on the consequences of purposely misleading us

## Craig Mills

---

**From:** Todd Gaudin [tgaudin@kfglaw.com]  
**Sent:** Thursday, April 24, 2014 10:56 PM  
**To:** craig.mills@cox.net  
**Subject:** Request sent to Lisa just now

THIS MESSAGE MAY CONTAIN *CONFIDENTIAL* and *PRIVILEGED* INFORMATION. If you are NOT the intended receiver, please close and delete immediately. Thank You.

I made the request to Lisa just now for her clients to grant you/Christy favor of seeing child at Touro. Asked her to send me text or call me tomorrow with answer. Will keep you informed. Have a restful sleep.

Todd

Gaudin Law Firm, LLC  
10839 Perkins Road, Baton Rouge, La 70810  
(225) 767-7186 -- Telephone  
(225) 767-7096 -- Fax