

STATE OF LOUISIANA THROUGH
THE DEPARTMENT OF CHILDREN
AND FAMILY SERVICES

VERSUS

KRISTY JONES

DOCKET NO. _____ DIV. _____

29TH JUDICIAL DISTRICT COURT

ST CHARLES PARISH

STATE OF LOUISIANA

CONSENT ORDER

This matter was set for hearing April 16, 2012 on the State's request for a preliminary injunction to halt the operation of an unlicensed child day care facility. Prior to hearing, the parties reached an agreement and enter into this Consent Order on the following terms:

1. Defendant, **KRISTY JONES** consent to the issuance of a preliminary injunction prohibiting her from operating a child day care facility without a license;
2. In recognition of **KRISTY JONES** cooperation, the State waives its request for statutory fines and penalties so long as **KRISTY JONES** complies with this order;
3. **KRISTY JONES** does agree to allow the Louisiana Department of Children and Family Services access to the facility as necessary to conduct site visits in compliance with state and federal guidelines.

The Court being satisfied that the Consent Order is reasonable under the circumstances, considering the verified petition and supporting affidavits, and is in accordance with law and evidence in this case, therefore

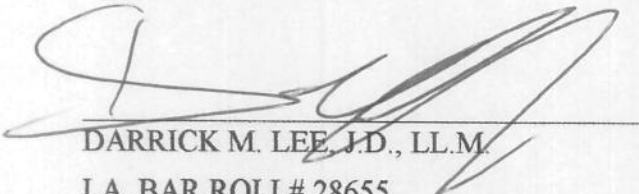
IT IS ORDERED that a preliminary injunction issue, directed to defendant **KRISTY JONES**, and enjoining, restraining and prohibiting her, her officers, directors, agents, employees, representatives, and all others acting on her behalf,

IT IS FURTHER ORDERED that **KRISTY JONES** do consistent with this Order,
allowing the Louisiana Department of Children and Family Services access to the
facility as necessary to conduct site visits in compliance with state and federal
guidelines.

So ordered at Thibodaux, Louisiana, this _____ day of _____, 2012.

JUDGE EMILE ST. PEIRRE
29TH JUDICIAL DISTRICT COURT

FOR PLAINTIFF:



DARRICK M. LEE, J.D., LL.M.

LA. BAR ROLL# 28655

DEPARTMENT OF CHILDREN

AND FAMILY SERVICES

BUREAU OF GENERAL COUNSEL

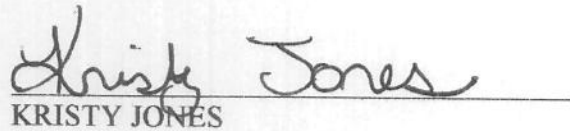
P.O. BOX 1887

627 N. FOURTH STREET

BATON ROUGE, LA 70821

(225) 342-1110 FAX 342-9139

FOR DEFENDANTS:



KRISTY JONES

566 SPRUCE STREET

NORCO, LA 70079

PH (504) 201-4037

STATE OF LOUISIANA THROUGH
THE DEPARTMENT OF CHILDREN
AND FAMILY SERVICES

VERSUS

KRISTY JONES

DIV. C
JUDGE
EMILE R. ST PIERRE

75,076-C
DOCKET NO. _____ DIV. _____

29TH JUDICIAL DISTRICT COURT

ST. CHARLES PARISH

STATE OF LOUISIANA

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DEPUTY CLERK OF COURT
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PETITION FOR INJUNCTIVE RELIEF

NOW INTO COURT, through undersigned Counsel, comes the State of Louisiana through the Department of Children and Family Services ("the Department"), who files this Petition for preliminary and permanent injunctive relief under the Child Care Facilities and Child-Placing Agencies Licensing Act.

1.

Defendant, **KRISTY JONES**, is an adult resident of this Parish.

2.

Defendant, **KRISTY JONES**, does not possess a license from the State of Louisiana to operate a daycare center as defined by Louisiana Statute.

3.

Defendant is operating a child day care facility at 566 Spruce Street, Norco, Louisiana, 70079 without a valid child day care license and has done so continuously since at least August 31, 2011.

4.

Defendant is providing care and supervision on a regular basis to seven or more children whose parents do not remain on the premises and who are not related to the caregiver, and operate their facility on a regular basis in excess of twelve and one-half hours per week.

5.

Because defendant does not have a license to operate lawfully and have continued to operate in violation of law despite actual knowledge that a license was required prior to beginning operation the Department asks that a preliminary injunction issue as provided under La. R.S. 46:1422.

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DCFS GENERAL COUNSEL

6.

After trial on the merits the Department asks that the preliminary injunction be made permanent.

7.

In addition, the Department seeks the statutory fines provided under La. R.S. 46:1421 of not less than seventy-five dollars (\$75.00) per day, nor more than two hundred fifty dollars (\$250.00) per day, for each day defendants have operated a child day care facility without a valid license.

WHEREFORE the Department respectfully requests:

1. That defendant, **KRISTY JONES**, be ordered to appear and show cause, on a date and time to be set by this Court, why a preliminary injunction should not issue, without bond, and enjoining, restraining and prohibiting them, their officers, agents, employees, representatives, and all others acting at their direction or on their behalf, from operating a child day care facility without a license during the pendency of these proceedings;
2. That after trial on the merits there be judgment in favor of the Department, and against Defendants, assessing Defendants the mandatory fines of not less than seventy-five dollars per day nor more than two-hundred fifty dollars per day, for each day they have operated a child day care facility without a license;
3. That after trial on the merits a permanent injunction issue, in form and substance like the preliminary injunction requested above; and
4. That all costs of these proceedings be taxed to Defendants.

BY ATTORNEY:



DARRICK M. LEE, J.D., LL.M.
LSBA NO. 28655
DCFS BUREAU OF GENERAL COUNSEL
627 N. FOURTH STREET
P.O. BOX 1887
BATON ROUGE, LA 70821
(225) 342-1110 FAX 342-1125