

STATE OF LOUISIANA THROUGH
THE DEPARTMENT OF CHILDREN
AND FAMILY SERVICES

DOCKET NO. 609,738 DIV. 26

VERSUS

STATE

19TH JUDICIAL DISTRICT COURT

RHONDA KENNEDY

MAR 14 2012

EAST BATON ROUGE PARISH

BY [Signature] STATE OF LOUISIANA
CLERK OF COURT

CONSENT ORDER

This matter was set for hearing March 15, 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, **RHONDA KENNEDY** consent to the issuance of a preliminary injunction prohibiting her from operating a child day care facility without a license;
2. In recognition of **RHONDA KENNEDY** cooperation, the State waives its request for statutory fines and penalties so long as **RHONDA KENNEDY** complies with this order;
3. **RHONDA KENNEDY** 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 **RHONDA KENNEDY**, and enjoining, restraining and prohibiting her, her officers, directors, agents, employees, representatives, and all others acting on her behalf, from operating a child day care facility without a license; this preliminary injunction to be effective during the pendency of these proceedings;

IT IS FURTHER ORDERED that the State hereby waives the statutory fines and penalties sought in its petition, contingent upon Defendant's compliance



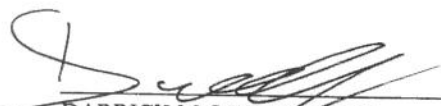
with this Order;

IT IS FURTHER ORDERED that **RHONDA KENNEDY** 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 Baton Rouge, Louisiana, this 19 day of March, 2012.


JUDGE KAY BATES
19TH JUDICIAL DISTRICT COURT

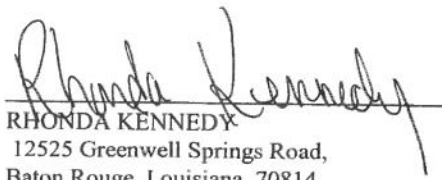
FOR PLAINTIFF:

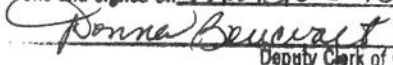

DARRICK M. LEE, JD., LL.M.
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DEPARTMENT OF CHILDREN
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BUREAU OF GENERAL COUNSEL
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BATON ROUGE, LA 70821
(225) 342-1110 FAX 342-9139

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FOR DEFENDANTS:


RHONDA KENNEDY
12525 Greenwell Springs Road,
Baton Rouge, Louisiana, 70814
(225) 454-9634

I certify that on this day a notice of this judgment was mailed by me, with sufficient postage affixed, to: Darrick Lee and Rhonda Kennedy
Done and signed on March 21, 2012

Deputy Clerk of Court

19TH JUDICIAL DISTRICT
EAST BATON ROUGE PARISH, LA
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DOUG WELBORN
CLERK OF COURT FOR PARISH

STATE OF LOUISIANA THROUGH
THE DEPARTMENT OF CHILDREN
AND FAMILY SERVICES

609738
DOCKET NO. _____ DIV. _____
SEC. 26
19TH JUDICIAL DISTRICT COURT

VERSUS

RHONDA KENNEDY

EAST BATON ROUGE PARISH

STATE OF LOUISIANA

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, Rhonda Kennedy, is an adult resident of this Parish.

2.

Defendant, Rhonda Kennedy 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 12525 Greenwell Springs Road, Baton Rouge, Louisiana, 70814 without a valid child day care license and has done so continuously since at least November 28, 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.

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CLERK OF COURT EAST B. PARISH

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, Rhonda Kennedy, 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.