

NO. 12-4863

IN THE SUPREME COURT OF ILLINOIS

MATT SHARPE,)	Interlocutory Appeal from the
)	Appellate Court of the Fifth
Petitioner,)	Judicial District of Illinois
)	No. 15-17-0321
v.)	
)	
CRYSTAL WESTMORELAND,)	
)	There Heard on Appeal from the
Respondent-Appellee,)	Circuit Court of the Third Judicial
)	Circuit, Madison County, Illinois
GREGG SHARPE,)	Case No. 11-D-1210
)	
Intervenor,)	
)	
and)	
)	
KRIS FULKERSON,)	
)	The Honorable Martin Menarelli
Intervenor-Appellant.)	Judge Presiding.

**AMICUS BRIEF OF THE NATIONAL ASSOCIATION OF SOCIAL WORKERS
IN SUPPORT OF THE INTERVENOR-APPELLANT KRIS FULKERSON**

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STATEMENT OF INTEREST

With 115,000 members and 55 chapters nationwide, the National Association of Social Workers (NASW or *amicus*) is the largest organization of professional social workers in the world. NASW's Illinois Chapter itself has more than 5,000 members. NASW was created in 1955 by the merger of seven predecessor social work organizations for the purpose of developing and disseminating high standards of practice while strengthening and unifying the social work profession as a whole. To further this purpose, NASW promulgates professional standards, conducts research, and develops policy statements on issues of importance to the social work profession. NASW and its members are especially committed to improving the lives of the most vulnerable members of the family unit: children.

NASW's professional members have significant knowledge and experience with the issues presented in this case. Social workers regularly engage with clients in their homes and provide counseling on topics such as family transitions, parent-child relationships, adoption, and custodial arrangements. Courts commonly call upon social workers to testify as expert witnesses in proceedings that affect the welfare of children, including custody and visitation hearings, foster care, parental fitness, and adoptions.

In this case, NASW summarizes some of the substantial empirical research demonstrating the importance of attachment bonds to a child's healthy development, regardless of the biological or legal status of the attachment figure. As the Court evaluates whether Appellant's status as a civil union partner allows her to assert standing to be heard on the question of whether the bond between her and her stepchild should be sustained under the same standard applicable to spouses, NASW urges it to consider the critical importance such bonds may play. A decision that makes it possible for trial courts to

preserve those bonds will protect the best interests of children raised in civil unions and support their healthy development.

The Court should recognize the standing of civil union partners as stepparents, and permit a civil union partner to petition for visitation and parental allocation of responsibilities pursuant to the Illinois Religious Freedom Protection and Civil Union Act (CUA) and the Illinois Marriage and Dissolution Act (MDA). Such a holding would allow both the legal or adoptive parent and the civil union stepparent to be heard on the legal and factual questions impacting the child's health, safety, and best interests; further, it would enable courts to make a fully informed decision that respects the legally recognized parent's rights as well as the child's interest in preserving bonds with other parental figures. In appropriate cases, maintaining such bonds helps to nurture a child's ability to grow into a strong and caring adult.

INTRODUCTION AND SUMMARY OF THE ARGUMENT

In Illinois and other states, a significant number of children are being raised by families formed by civil union rather than marriage. In many such cases one civil union partner will lack a biological or other legally-recognized parental connection to the child the partner is raising. Social science research has established, unequivocally, that children can form crucial attachment bonds with individuals that have no biological or other legally recognized parental status with respect to them. Nor does the absence of such a status diminish the emotional sustenance that children derive from such relationships. To the contrary, the harm that results from the severance of such bonds will ensue whether the child's attachment is to a parent or stepparent who has acted as a parent for a significant or extensive period of time.

In recognition of the changing realities of the American family, a number of states have enacted statutes that provide avenues for parental figures that are not legally recognized—such as, for example, grandparents and stepparents—to petition for visitation and the allocation of parental rights. These statutes are not designed simply to protect the rights of adults who have undertaken important parental responsibilities; they also help “to ensure the welfare of the children [in such families] by protecting the relationships [they] form with such third-parties.” *Troxel v. Granville*, 530 U.S. 57, 64 (2000); *see also* 96th Ill. Gen. Assem., House Proceedings, Nov. 30, 2010, at 188 (statements of Representative Lang) (noting that, with the CUA, the legislature intended to “encourage[e] love,...commitment, [and] family togetherness”). Although these statutes acknowledge and account for the parent’s constitutionally protected right to make decisions concerning the care, custody, and control of their children, they do so in the broader context of protecting the health, safety, and interests of the children involved. Illinois’s Marriage and Dissolution of Marriage Act is one such statute.

The court below reasoned that the CUA and the MDA must be read in light of the parent’s constitutionally protected interest in their relationship with their child. While the NASW recognizes that, in Illinois, parents enjoy a “superior right” to control the care and custody of their children, *In re Parentage of Scarlett Z.-D.*, 2015 IL 117904 ¶ 35, it asserts that said right is not absolute. Indeed, in a number of cases, Illinois’s courts have held that nonparents have standing to petition for visitation and other related rights where the denial of such rights would be unreasonable and harmful to the child at issue. *See, e.g., Robinson v. Reif*, 2014 IL App. (4th) 140244, ¶ 93 (noting that a parent’s “actions and decisions concerning the care, custody, and control of [their] children are presumptively valid”, but

then finding this presumption overcome where said actions and decisions “were animated by factors other than the child’s best interests”); *Rotante v. Morgano*, 2017 IL App. (3d) 150391-U, ¶¶ 27-30 (unpublished); *see also Wickham v. Byrne*, 199 Ill. 2d 309, 317 (2002) (“State interference with fundamental parental childrearing rights is justified in limited instances to protect the health, safety, and welfare of children.”).

Here, according to the pleadings, the marriage of Mr. Sharpe and Ms. Westmoreland was dissolved in January of 2013. At that time, their daughter A.S. was seven years old. The joint parenting agreement executed by the parties provided that A.S. would reside with her father, Mr. Sharpe, and that the two biological parents would share equal parenting time. In November of 2013, after Mr. Sharpe entered into a civil union with Kris Fulkerson, Ms. Fulkerson and her three children began to live with Mr. Sharpe and A.S. For the next four years—during which time A.S. grew from seven years old to eleven years old—Ms. Fulkerson played a central role in parenting A.S. Mr. Sharpe passed away in January of 2017. Shortly after her ex-husband’s untimely death, Ms. Westmoreland began to deny Ms. Fulkerson visitation with A.S., notwithstanding that A.S. actively expressed a desire to live with Ms. Fulkerson and her other children. Ms. Fulkerson was moved to file the petition that gave rise to this matter seeking just *the opportunity* to present a case for preserving her bond with A.S. by seeking visitation rights and an allocation of parental responsibilities. Accepting these pleaded facts as true, NASW asks the Court to recognize that granting standing to Ms. Fulkerson as a stepparent under the Civil Union Act serves the goal of protecting Ms. Westmoreland’s “superior” rights while also taking into account A.S.’s best interests. It does so by allowing Ms.

Fulkerson an opportunity to show that she meets the applicable statutory standards for stepparent visitation or an allocation of parental responsibilities.

From a scientific standpoint, it is extremely important that Ms. Fulkerson be given a chance to show how she has satisfied the heightened burden placed on nonparent caregivers that would seek visitation and other parental rights. Empirical evidence has shown that children will develop emotionally and psychologically significant attachment bonds as a result of parental-figure-and-child interactions themselves; in forming such bonds, children do not stop to consider the niceties of biology or legal status. At the very moment of their conception, such bonds are significant. While their preservation can foster a healthy transition to adulthood, their destruction can have a crushing impact on the child. The research is conclusive—the negative consequences that arise from disrupting the bonds between a child and a parenting figure are both short- and long-term, and range, *inter alia*, from anxiety and excessive eating, to substance abuse and states of insecure attachment. The serious harm caused by the unavoidable loss of one parent is compounded in the event of a subsequent loss of additional parenting figures. The best way to avoid these kinds of injuries is, in the first place, to avoid—where possible—the disruption or destruction of the child’s attachment bonds.

When a court’s decision implicates the stability of a child’s fully formed attachment bonds, the health, safety, and best interests of the child require the court’s attention. In this case, A.S.’s best interests cannot be meaningfully assessed without the participation of one of the parenting figures to whom she has bonded; for this reason, NASW respectfully urges the Court to permit Ms. Fulkerson to be heard on A.S.’s future.

ARGUMENT

The CUA provides that a party to a civil union is entitled to the same benefits afforded spouses under Illinois Law. 750 ILCS 75/20; *see also* 750 ILCS 75/10 (stating that a “[p]arty to a civil union” means, and should be included in “any definition or use of...terms that denote the spousal relationship, as those terms are used throughout the law”). The MDA defines a “stepparent” as “a person *married* to a child’s parent”; by operation of the CUA, that definition includes any person who enters into a civil union with a child’s parent. *See* 750 ILCS 5/602.9(a)(3) (emphasis added). The MDA provides stepparents with standing to petition for visitation if the parent’s “unreasonable” denial of such visitation causes the child to suffer “undue mental, physical, or emotional harm” and it would not be in the child’s best interest to maintain the denial. 750 ILCS 5/602.9; *see also* *Robert H. v. Andrea Abbott H.*, 2019 IL App. (5th) 180559, ¶¶ 16-17; *Robinson*, 2014 IL App. (4th) 140244, at ¶¶ 70, 75. While the CUA and the MDA recognize the legal significance of the bond between a parent and child, they also recognize that legal determinations that affect a child’s rearing can benefit from the viewpoint and contribution of non-biological parenting figures. *See, e.g., In re R.L.S.*, Ill. 2d 428, 444 (2006) (concluding that, even accounting for a parent’s superior right, “a fit parent’s custody rights are subservient to the best interests of the child”); *Troxel*, 530 U.S. at 69 (noting that, in limited circumstances, it may be appropriate for courts to interfere with a parent’s fundamental rights with respect to their children).

A substantial body of well-structured, peer-reviewed studies confirms that this approach is immensely valuable from the child’s perspective. These studies demonstrate that a child’s attachment bonds—including those directed to non-biological parental

figures—are critical to the child’s healthy development, and that the preservation of all of these bonds is in the child’s best interests. A number of them are summarized below.

Emotionally supportive parent-child relationships that do not have biological roots are ubiquitous, and in every community in this country one can find happy and well-adjusted families created by civil union, adoption, remarriage, foster care, and other configurations. The unambiguous teaching of the research is that such families thrive notwithstanding the absence of biological connections between the children and one or more of the adults who are raising them. The bonds formed in such units should be part of the equation when evaluating a child’s well-being, along with the proper claims of the biological or other legally recognized parents.

I. Empirical research confirms that the formation of attachment bonds is critical to a child’s healthy development.

Children develop strong attachment relationships with their biological parents and other parental figures early in life, and these relationships strengthen over time. *See, e.g.,* Melvin Konner, *Childhood* 84-87 (1991); John Bowlby, *Attachment* (2d ed. 1982). An “attachment relationship” is a “reciprocal, enduring, emotional, and physical affiliation” through which a child forms his or her “concepts of self, others, and the world.” Beverly J. Hames, *Handbook for Treatment of Attachment-Trauma Problems in Children* 1-2 (1994). “Attachment figures are one’s most trusted companions.” Mary D. Ainsworth et al., *Patterns of Attachment: A Psychological Study of the Strange Situation* 20 (1978). Further, the presence of multiple attachment figures in a child’s life provides additional benefits. Tomotaka Umemura et al., *Adolescents’ Multiple Versus Single Primary Attachment Figures, Reorganization of Attachment Hierarchy, and Adjustments: The Important People Interview Approach*, 20(5) *Attachment & Hum. Development* 532, 532 (2018) (finding that

adolescents who bonded with multiple attachment figures were less likely to internalize problems than those who only bonded with one).

Attachment relationships foster the development of “self-awareness, social competence, conscience, emotional growth and emotional regulation, [and] learning and cognitive growth.” Nat’l Research Council & Inst. of Med., *From Neurons to Neighborhoods: The Science of Early Childhood Development* 265 (Jack P. Shonkoff & Deborah A. Phillips eds., 2000); see also James G. Byrne et al., *Practitioner Review: The Contribution of Attachment Theory to Child Custody Assessments*, 46 *J. Child Psychol. & Psychiatry* 115, 118 (2005). Examples of the importance of stable attachment bonds abound. One study found a statistically significant correlation between secure attachment and successful peer relations. Barry Schneider et al., *Child-Parent Attachment and Children’s Peer Relations: A Quantitative Review*, 37 *Developmental Psychol.* 86, 90 (2001). Another examined stepparent-child relationships, specifically, and found that a close and positive relationship between stepparent and child correlates with the child’s tendency to address problems in a healthy manner over time. Todd M. Jensen et al., *Stepfamily Relationship Quality and Children’s Internalizing and Externalizing Problems*, 57(2) *Family Process* 477 (2017). Additional empirical research confirming the link between strong attachment bonds and healthy children is presented in the various works cited throughout this brief.

II. Children experience severe emotional and psychological harm when their attachment relationships with their parents or other attachment figures are severed.

Given the centrality of healthy attachment relationships to a child’s psychological well-being, it is only to be expected that the disruption of such a relationship would likely

result in injury to the child. This is again confirmed by the empirical research, which shows that the termination of a child's relationships with attachment figures can have "devastating" impacts on the child. William F. Hodges, *Interventions of Children of Divorce: Custody, Access, and Psychotherapy* 8-9 (2d ed. 1991). Moreover, when a child has lost a key relationship—in A.S's case, through the death of her father—additional disruptions would be expected to compound and exacerbate the injury. James X. Bemby & Carolyn Ericson, *Therapeutic Termination with the Early Adolescent Who Has Experienced Multiple Losses*, 16 *Child & Adolescent Soc. Work J.* 177, 182-83 (1999). In such situations, children predictably experience a period of denial, followed by periods of protest, despair, and detachment. See Rayford W. Thweatt, *Divorce: Crisis Intervention Guided by Attachment Theory*, 34 *Am. J. Psychotherapy* 240, 241 (1980). Children may also "conclude that a parent's absence is due to their own unlovability. Thus, abandonment by a noncustodial parent is a particularly devastating experience." Hodges, *supra*, at 8-9.

Severing an attachment bond has both short- and long-term consequences. In terms of the former, it can lead to anxiety, aggression, academic problems, and elevated psychopathology. Ana H. Marty et al., *Supporting Secure Parent-Child Attachments: The Role of the Non-Parental Caregiver*, 175 *Early Childhood Dev. & Care* 271, 274 (2005). As well, researchers have found that severance can cause "hiding or hoarding food, excessive eating or drinking, rumination, self-stimulating and repetitive behavior, and sleep disturbance." Mark Simms et al., *Health Care Needs of Children in the Foster Care System*, 106 *Pediatrics* 909, 912 (2000). In addition to these short-term behavioral effects, the destruction of strong attachment bonds can turn a child into "[a]n insecurely attached person [who] will anticipate rejection, unpredictability, or even cruelty ... [e]ven when

reality does not indicate these outcomes.” Bemby & Ericson, *supra*, at 182-83; *see also* Frank J. Dyer, *Termination of Parental Rights in Light of Attachment Theory: The Case of Kaylee*, 10 Psychol. Pub. Pol’y & L. 5, 11 (2004) (stating that numerous empirical findings “provide a solid research basis for predictions of long term harm associated with disrupted attachment [relationships]”); Joan B. Kelly & Michael E. Lamb, *Using Child Development Research to Make Appropriate Custody & Access Decisions for Young Children*, 38 Fam. & Conciliation Cts. Rev. 297, 303 (2000) (explaining that “there is a substantial literature documenting the adverse effects of disrupted parent-child relationships on children’s development and adjustment”).

III. Attachment relationships develop despite the absence of a biological connection between parental figure and child.

The extensive literature on parent-child attachment has found that it is the nature and quality of the parent-child interaction itself, as opposed to a biological link, that fosters attachment relationships. *See, e.g.*, Raymond W. Chan et al., *Psychosocial Adjustment Among Children Conceived via Donor Insemination by Lesbian and Heterosexual Mothers*, 69 Child Dev. 443, 454 (1998) (“[O]ur results are consistent with the general hypothesis that children’s well-being is more a function of parenting and relationship processes within the family [than] household composition or demographic factors.”).

Importantly, attachment bonds between children and non-biological parental figures are no less important than any other attachment bonds. *See generally* Joseph Goldstein et al., *Beyond the Best Interests of the Child* 27 (2d ed. 1979). Children can develop these bonds with anyone who “on a continuing, *day-to-day basis*, through interaction, companionship, interplay, and mutuality, fulfill[] the child’s psychological

needs for a parent, as well as the child’s physical needs.” *Id.* at 98 (emphasis added); *see also* Jude Cassidy, *The Nature of the Child’s Ties* in *Handbook of Attachment: Theory, Research & Clinical Applications* 3, 12 (1999). For example, a study of families who had used assisted reproduction methods found no evidence to indicate that “the missing genetic link” between parent and child had affected the father-child relationship in young children. Anne Brewaeys, *Review: Parent-Child Relationships and Child Development in Donor Insemination Families*, 7 *Hum. Reprod. Update* 38, 44 (2001). In another study, researchers found that children adopted by lesbian couples “developed bonds of attachment to **both** adoptive mothers and showed preference for the parents over other caregivers.” Susanne Bennett, *Is There a Primary Mom? Parental Perceptions of Attachment Bond Hierarchies Within Lesbian Adoptive Families*, 20 *Child & Adolescent Soc. Work J.* 159, 166 (2003) (emphasis added).

Numerous studies have shown that it is the presence of positive relationships and processes within a family, and not the family-type, that impacts a child’s peer relations and general development. *See, e.g.*, Todd M. Jensen, *Constellations of Dyadic Relationship Quality in Stepfamilies: A Factor Mixture Model*, 31(8) *J. Family Psychol.* 1051, 1051-62 (2017) (noting how stepparent-child relationships “can promote youth adjustment across a number of physical, behavioral, and psychological well-being indicators”); Elizabeth Short et al., *Lesbian, Gay, Bisexual and Transgender (LGBT) Parented Families: A Literature Review Prepared for The Australian Psychological Society* 25 (2007), <https://www.psychology.org.au/About-Us/What-we-do/advocacy/Position-Papers-Discussion-Papers-and-Reviews/LGBTI-parented-families> (“The research indicates that parenting practices and children’s outcomes in families parented by lesbian and gay parents

are likely to be at least as favorable as those in families of heterosexual parents, despite the reality that considerable legal discrimination and inequity remain significant challenges for these families.”). *See also* A. Brewaeys et al., *Donor Insemination: Child Development and Family Functioning in Lesbian Mother Families*, 12 *Hum. Reprod.* 1349, 1358 (1997) (finding that the non-biological mother in lesbian families “was regarded by the child as just as much a ‘parent’ as the father in the heterosexual families”).

The fact that Ms. Fulkerson was a parent in a civil union partnership does not diminish the emotional significance of her connection with A.S. Again, the empirical literature supporting this conclusion is abundant. *See, e.g., id.* at 1356 (confirming “a strong mutual attachment” can develop between a non-biological mother and child); Joseph S. Jackson & Lauren G. Fasig, *The Parentless Child’s Right to a Permanent Family*, 46 *Wake Forest L. Rev.* 1, 53 nn. 250-51 (2011) (surveying literature demonstrating the formation of secure attachment bonds between foster children and their foster parents); Lawrence M. Berger et al., *Parenting Practices of Resident Fathers: The Role of Marital and Biological Ties*, 70(3) *J. Marriage & Family* 625, 631 (2008) (“We expected that biological fathers would demonstrate higher quality parenting practices than social fathers. For the most part, however, we do not find this to be the case.”). The reality today is that, in many families, a non-biological parent’s involvement with a child will be greater and more positive than that of living biological parents. *See, e.g.,* Henry M.W. Bos et al., *Child Adjustment and Parenting in Planned Lesbian-Parent Families*, 77 *Am. J. Orthopsychiatry* 38, 45 (2007).

Importantly, the harm that results when a child is separated from an attachment figure does not depend on there being a biological link between the two. Yvon Gauthier et al., *Clinical Application of Attachment Theory in Permanency Planning for Children in*

Foster Care: The Importance of Continuity of Care, 25 *Infant Mental Health J.* 379, 394 (2004) (explaining that children suffer greatly when separated from non-biological parental figures); Fiona L. Tasker & Susan Golombok, *Growing Up in a Lesbian Family: Effects on Child Development* 12 (1997) (finding that cessation of the parent-child bond between a child and a lesbian psychological parent “can cause [the child] extreme distress”). Thus, courts should take special care when their decisions are likely to threaten or sever bonds between children and parental figures.

IV. A child’s health and welfare are best served by nurturing and maintaining attachment bonds with both biological and non-biological parents and parental figures.

The obvious way to avoid injury arising from termination of a healthy parent-child bond is to avoid disrupting it in the first place. By allowing parental figures the opportunity to petition for visitation and/or custody, courts can better ensure that the health, safety, and best interests of the child in question are protected.

Empirical research has shown that children benefit from stable, continued interaction with parental figures. See Denise Donnelly & David Finkelhor, *Does Equality in Custody Arrangement Improve Parent-Child Relationship?*, 54 *J. Marriage & Fam.* 837,838 (1992) (“Children who maintain contact with both parents tend to be better adjusted.”); Grazyna Kochanska & Sanghag Kim, *Early Attachment Organization with Both Parents and Future Behavior Problems: From Infancy to Middle Childhood*, 84(1) *Child Dev.* 283, 283-96 (2013). Participation in everyday activities promotes trust and strengthens the attachment relationship between parent and child. See Michael E. Lamb, *Placing Children’s Interests First: Developmentally Appropriate Parenting Plans*, 10 *Va. J. Soc. Pol’y & L.* 98, 103, 113-14 (2002).

The parent-child interaction is just as critical when the parent lacks biological ties to the child. Sharon H. Bzostek, *Social Fathers and Child Well-Being*, 70 *J. Marriage & Family* 950, 950, 958-59 (2008) (reporting that “involvement by resident social fathers is as beneficial for child well-being as involvement by resident biological fathers”); Charlotte J. Patterson, *Children of Lesbian and Gay Parents*, 63 *Child Dev.* 1025, 1037 (1992) (concluding that, when same-sex parents who have jointly raised a child since birth separate, “it is reasonable to expect that the best interests of the child will be served by preserving the continuity and stability of the child’s relationship with both parents”).

In light of these considerations, the American Psychoanalytic Association, the American Academy of Pediatrics, and NASW have all concluded that relationships with non-biological parents and attachment figures should be considered by courts when a child’s best interests are being evaluated. Psychoanalytic Ass’n, *Position Statement on Parenting*, (June 2012), <https://apsa.org/sites/default/files/2012%20%20Position%20Statement%20on%20Parenting.pdf> (concluding “that the salient consideration in all decisions about custody and parenting...child rearing, adoption, and visitation, is the best interest of the child”, a factor which is influenced most strongly by “family processes and the quality of interactions and relationships”); George J. Cohen et al., *Am. Acad. of Pediatrics, Policy Statement: Helping Children and Families Deal with Divorce and Separation*, 138(6) *Pediatrics* 1, 4 (2016), <https://pediatrics.aappublications.org/content/pediatrics/138/6/e20163020.full.pdf> (“A person who raises a child but who does not have a legal relationship to that child through biology, marriage, or adoption may not have the same protections for a continued relationship with the child despite the fact that the effect on the child can be as significant.”); *accord* Nat’l Ass’n of Soc. Workers,

Policy Statement: Lesbian, Gay, and Bisexual Issues in Social Work Speaks 219, 221-222 (9th ed. 2012).

In short, giving parents and other attachment figures, such as stepparents, the opportunity to seek visitation and an allocation of parental responsibilities with respect to the children they have helped raise represents an important step toward fostering the stability and health of such children, and gives these children a better chance of growing up emotionally healthy and strong.

CONCLUSION

For all of the foregoing reasons, *amicus* the National Association of Social Workers, including its Illinois Chapter, respectfully urge this Court to reverse the decision of the Appellate Court below.

Date: December 4, 2019

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I hereby certify that this brief conforms to the requirements of Rules 341(a) and (b). The length of this brief, excluding the pages or words contained in the Rule 341(d) cover, the Rule 341(h)(1) statement of points and authorities, the Rule 341(c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is 15 pages.

Date: December 4, 2019

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NO. 12-4863

IN THE SUPREME COURT OF ILLINOIS

MATT SHARPE,)	Interlocutory Appeal from the
)	Appellate Court of the Fifth
Petitioner,)	Judicial District of Illinois
)	No. 15-17-0321
v.)	
)	
CRYSTAL WESTMORELAND,)	
)	There Heard on Appeal from the
Respondent-Appellee,)	Circuit Court of the Third Judicial
)	Circuit, Madison County, Illinois
GREGG SHARPE,)	Case No. 11-D-1210
)	
Intervenor,)	
)	
and)	
)	
KRIS FULKERSON,)	
)	The Honorable Martin Menarelli
Intervenor-Appellant.)	Judge Presiding.

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**NOTICE OF FILING OF BRIEF OF AMICUS CURIAE NATIONAL ASSOCIATION
OF SOCIAL WORKERS**

PLEASE TAKE NOTICE that on December 4, 2019, the undersigned electronically filed
the **Amicus Brief of the National Association of Social Workers in Support of Intervenor-**

Appellant Kris Fulkerson in the above-captioned case with the Clerk of the Supreme Court of Illinois using OdysseyIL eFile. A copy is hereby served upon you.

Date: December 4, 2019

Respectfully submitted,

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PROOF OF FILING AND SERVICE

I hereby certify that on December 4, 2019, I caused the **Amicus Brief of the National Association of Social Workers in Support of Intervenor-Appellant Kris Fulkerson** to be electronically filed with the Clerk of the Supreme Court of Illinois by using the Odyssey eFileIL system. I further certify that I will cause one copy of the above-named filings to be served upon counsel listed below via electronic mail on December 4, 2019.

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Under penalties as provided by law pursuant to Section 1 - 109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct.

/s/ Michael L. Brody

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12/11/2019 2:00 PM
Carolyn Taft Grosboll
SUPREME COURT CLERK