

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF:)
AAMIYAH DE'NASIA LAMB)
AND CHRISTOPHER LAMONT)
BYNUM JR.)

Minors.)

KEAUNDRA DEBERRY,)

Appellant,)

vs.)

CLARK COUNTY DEPARTMENT)
OF FAMILY SERVICES,)

Respondents.)

SUPREME COURT NO. 69047

District Court No. D-11-446967-R

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CO-APPELLANT'S APPENDIX

VOLUME 1 PART B

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SIBLING CONTACT:

- ☐ Placed Together
☒ Not Placed Together – KEAUNDRE BYNUM DOB 12/29/2010, resides with his natural mother in Bossier, LA. KEAUNDRE safety is monitored by the maternal grandmother. Per maternal grandmother there are no marks or bruises on KEAUNDRE as of April 19, 2011.

REASONABLE EFFORTS TO ACHIEVE THE PERMANENCY PLAN:

On behalf of the parents:

Copy of case plan provided to parents and ICPC case worker in Louisiana.

On April 14, 2011 The natural parents were instructed to contact the following organizations for treatment, testing or assessments.

Community Support,- 3341 Youree Drive Suite 200, Shreveport, LA. 71105. (318)-865-1422/FAX 318-865-4566. Group sessions for parenting and nurturing parenting classes.

The Center for Families/Family Counseling Center, 864 Olive Street, Shreveport, LA. (318)-222-0759. Parenting, Anger Management, Family Counseling and Physical Abuse.

Office of Additive Disorders (OAD), 8932 Jewella Ave, Shreveport, LA. 71118. Phone (318)-632-2040 FAX: 318-2161. Assessment, classes, and substance abuse testing.

Complete Lab Solutions, 2223 Old Minden Road, Bossier City, LA. 71111 (318)-550-0399.

On behalf of the child(ren):

Maintain contact with ICPC in the state of Louisiana.

Obtain quarterly report from ICPC in the state of Louisiana.

Referred maternal grandparents to licensed foster care agency in Louisiana.

Diligent search for Virgil Graves, punitive father as to Aamiyah Lamb.

Letter to Mr. Graves regarding parentage as to Aamiyah Lamb.

Ordered DNA testing for Mr. Graves on 5/6/11.

1 **GOALS FOR THE NEXT REVIEW PERIOD:**

2 The goals for the next review period are to submit the case to refer the case to the
3 District Attorney for TPR and adoption, Adoption and Safe Families Act (ASFA)
4 guidelines and agency policy.

5 **SUMMARY AND RECOMMENDATIONS:**

6 AAMIYAH and CHRISTOPHER are Wards of the court as being adjudicated and
7 neglected children. Christopher Jr. sustained a burn reportedly from a clothing iron to
8 his cheek and the parents did not seek immediate medical care for Christopher and
9 actively denied access to the child by CPS and Police. Natural mother Keaundra
DeBerry and natural father Christopher Bynum Sr. had absconded from Las Vegas to
Barksdale Louisiana in an apparent attempt to evade CPS and North Las Vegas Police
who were investigating the family for environmental neglect and physical abuse.

10 The Department of Family Services recommends that the above-mentioned minors
11 remain Wards of the Family Court.

12 **CHILD SUPPORT:**

13 To be decided by the court.

14 **WHEREFORE, DEPARTMENT OF FAMILY SERVICES RESPECTFULLY
15 RECOMMENDS:**

- 16 (1) That AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM JR. remain
17 under the jurisdiction of the Family Court and in the legal custody of the
18 Clark County Department of Family Services;
19 (2) That the efforts made by the Department of Family Services are found to be
20 reasonable efforts as outlined in this report;
21 (3) That this matter be brought back for Formal Review in six months.
22 (4)

23 Submitted By:

24 


25 MICHELLE JORDAN
26 CASE MANAGER
27 CLARK COUNTY
28 DEPARTMENT OF FAMILY SERVICES
701K N. PECOS
LAS VEGAS, NEVADA 89101

CHERYL COOKE
SUPERVISOR

DATE: 4/25/2011
COURT CASE NO.: J-10-319959-P1

Hay servicios gratis de ayuda con otros idiomas. Para pedir un intérprete, llame por favor al Coordinador
de Servicios de Intérpretes al 671-4578

Free language assistance services are available. To request an interpreter, please call the Language
Assistance Coordinator at 671-4578.



CLERK OF THE COURT

PTPR
DAVID ROGER
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By: Jennifer Kuhlman
Deputy District Attorney
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DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

In the Matter of the Parental Rights as to:

AAMIYAH DE'NASIA LAMB,
CHRISTOPHER LAMONT BYNUM, JR.,

Minors.

Case No. D-11-446967 -R
Department C
Courtroom 8 - Judge Jones

PETITION TO TERMINATE PARENTAL RIGHTS

The verified petition of Michelle Jordan, Case Worker for the Clark County Department of Family Services, Las Vegas, Nevada, respectfully shows to the Court as follows:

I

AAMIYAH DE'NASIA LAMB was born on January 4, 2004, in Wayne County, North Carolina.

II

CHRISTOPHER LAMONT BYNUM, JR., was born on March 28, 2009, in North Las Vegas, Clark County, Nevada.

III

AAMIYAH DE'NASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR., currently reside with a relative

IV

AAMIYAH DE'NASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR., were adjudicated neglected children and made Wards of the Eighth Judicial Court, Juvenile Division, in Case No. J319959, and placed into the custody of the Department of Family Services. AAMIYAH DE'NASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR., were placed into physical custody

1 on May 12, 2010 and the Clark County Department of Family Services has maintained legal custody of
2 these children since February 4, 2011.

3 V

4 The birth certificate issued by the State of North Carolina of AAMIYAH DENASIA LAMB
5 lists KEAUNDRA LOUISE DEBERRY as the mother and JOSEPH LAMB is listed as the father of
6 AAMIYAH DENASIA LAMB. KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY
7 was not married to JOSEPH LAMB, aka JOSEPH NATHANIEL CLARENCE LAMB at the time of the
8 birth of AAMIYAH DENASIA LAMB, and it is uncertain how JOSEPH LAMB, aka JOSEPH
9 NATHANIEL CLARENCE LAMB was placed on the birth certificate of AAMIYAH DENASIA
10 LAMB; and therefore, JOSEPH LAMB, aka JOSEPH NATHANIEL CLARENCE LAMB is the
11 putative father of AAMIYAH DENASIA LAMB, pursuant to NRS 128.016. The mother has also
12 named VIRGIL GRAVES as the father of AAMIYAH DENASIA LAMB; and therefore, VIRGIL
13 GRAVES is the putative father of AAMIYAH DENASIA LAMB, pursuant to NRS 128.016. The true
14 identity of the father of AAMIYAH DENASIA LAMB is unknown.

15 VI

16 The birth certificate issued by the State of Nevada, Department of Human Services, Division of
17 Health - Section of Vital Statistics of CHRISTOPHER LAMONT BYNUM, JR., lists KEAUNDRA
18 LOUISE DEBERRY as the mother and CHRISTOPHER LAMONT BYNUM as the father of
19 CHRISTOPHER LAMONT BYNUM, JR.,. It is unknown if KEAUNDRA LOUISE DEBERRY, aka
20 KEAUNDRA DEBERRY was married at the time of the birth of CHRISTOPHER LAMONT BYNUM,
21 JR.,. Therefore, pursuant to NRS 126.051, NRS 126.053, or NRS 126.161, CHRISTOPHER LAMONT
22 BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka
23 CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM,
24 aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS,
25 aka CHRISTOPHER L BYNUM is the legal or legally presumed father of CHRISTOPHER LAMONT
26 BYNUM, JR.,.

VII

KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES, CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons claiming paternity are necessary and proper parties to these proceedings.

VIII

The address of the Clark County Department of Family Services is Clark County, Nevada. The last known address of KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY is 207 Earhart Ave., Barksdale AFB, LA 71110 and 1820 East Texas St., Bossier City, LA 71111. The last known address of JOSEPH LAMB, aka JOSEPH NATHANIEL CLARENCE LAMB is 600 Whitfield Drive, Goldsboro, North Carolina 27530 and 660 East New Hope Road #A5, Goldsboro, North Carolina 27534. The last known address of VIRGIL GRAVES is 506 16th Ave., Dillon, South Carolina 29536. The address of all other persons claiming paternity is unknown. The last known address of CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM is 10 West End St., Tallulah, Louisiana 71282. The Clark County Department of Family Services does not know any relatives' addresses in the State of Nevada.

IX

KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES, CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons claiming paternity have

1 abandoned AAMIYAH DENASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR., as defined
2 in NRS 128.012, in that for the past six months, they have conducted themselves in a manner that
3 evinces a settled purpose to forego all parental custody and relinquish all claims to these children.
4 Further, since the period of abandonment is in excess of six (6) months, it is presumed that
5 KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES,
6 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
7 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
8 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
9 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons claiming paternity
10 intended to abandon AAMIYAH DENASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR.,.

11 X

12 KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES and
13 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
14 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
15 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
16 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM have neglected AAMIYAH DENASIA
17 LAMB and CHRISTOPHER LAMONT BYNUM, JR., as defined in NRS 128.014, in that they have
18 failed to provide these children with proper parental care by reason of their faults or habits, have
19 neglected or refused to provide proper or necessary subsistence, education, medical or surgical care, or
20 other care necessary for the children's health, morals or well-being.

21 XI

22 KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES and
23 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
24 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
25 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
26 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM, as defined in NRS 128.018 and NRS
27 128.105(2)(c), are unfit parents in that they have by reason of their faults, habits or conduct, failed to
28

1 provide AAMIYAH DE'NASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR., with proper
2 care, guidance and support.

3 XII

4 KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES and
5 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
6 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
7 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
8 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM, as defined in NRS 128.105(2)(d), have
9 failed within a reasonable period of time to remedy substantially conditions which led to AAMIYAH
10 DE'NASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR.,'s foster placement, even though
11 appropriate and reasonable efforts have been made on the part of state agencies and others to return and
12 to reunite KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES and
13 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
14 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
15 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
16 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM with their children.

17 XIII

18 KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES and
19 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
20 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
21 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
22 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM, as defined in NRS 128.105(2)(e), pose the
23 risk of serious physical, mental or emotional injury to AAMIYAH DE'NASIA LAMB and
24 CHRISTOPHER LAMONT BYNUM, JR., if they were to be returned to their parent or parents.

25 XIV

26 KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES and
27 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
28

1 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
2 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
3 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM, as defined in NRS 128.105(2)(f), at the very
4 most, have made only token efforts to support or communicate with AAMIYAH DE'NASIA LAMB
5 and CHRISTOPHER LAMONT BYNUM, JR., to prevent neglect of these children; to avoid being
6 unfit parents and to eliminate the risk of serious physical, mental and emotional injury to these children.

7 XV

8 Pursuant to NRS 128.105(1), 128.107 and 128.108, the best interests of AAMIYAH DE'NASIA
9 LAMB and CHRISTOPHER LAMONT BYNUM, JR., will be served by the termination of parental
10 rights of KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES,
11 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
12 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
13 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
14 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons claiming paternity.

15 XVI

16 This Honorable Court has jurisdiction of this matter, pursuant to NRS 128.020, in that the acts
17 complained of herein occurred in Clark County, Nevada.

18 XVII

19 To the best knowledge, information and belief of Petitioner, no legal guardian has been
20 appointed for AAMIYAH DE'NASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR., within
21 the State of Nevada or elsewhere. AAMIYAH DE'NASIA LAMB and CHRISTOPHER LAMONT
22 BYNUM, JR., are not known to be Indian children.

23 WHEREFORE, Petitioner prays for an Order terminating the parental rights of KEAUNDRA
24 LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES, CHRISTOPHER LAMONT
25 BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka
26 CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM,
27 aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS,

1 aka CHRISTOPHER L BYNUM and all other persons claiming paternity, declaring AAMIYAH
2 DENASIA LAMB and CHRISTOPHER LAMONT BYNUM, JR., to be free from the custody and
3 control of KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES,
4 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
5 BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
6 LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka
7 CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons claiming paternity
8 absolutely and forever.


9 DATED and DONE this _____ day of _____, 2011.

10 

11 Michelle Jordan, Case Worker
12 Clark County Department of Family Services

13 Submitted by:

14 DAVID ROGER
15 DISTRICT ATTORNEY

16 
17 By: Jennifer Kuhlman
18 Deputy District Attorney
19 Nevada Bar No. 10113
20 601 N. Pecos Road, Ste. 470
21 Las Vegas, NV 89101
22 (702) 455-5320

23 JK/jr
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VERIFICATION

STATE OF NEVADA }
COUNTY OF CLARK } ss.

I, Michelle Jordan, do hereby swear under penalty of perjury that the assertions of this verification are true.

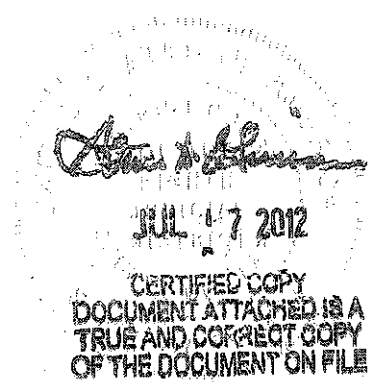
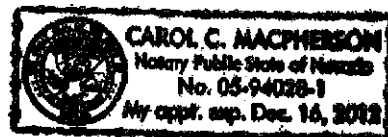
I am a Case Worker for the Clark County Department of Family Services; I have read the foregoing Petition and know the contents thereof; the same is true of my own knowledge except as to those matters therein stated upon information and belief, and as to those matters, I believe them to be true.

Michelle Jordan
Michelle Jordan

SUBSCRIBED and SWORN to before me by
Michelle Jordan

this 23rd day of May

Carol C. MacPherson
NOTARY PUBLIC



1 ASBP
2 DAVID ROGER
3 DISTRICT ATTORNEY
4 Nevada Bar No: 2781
5 JENNIFER KUHLMAN
6 Deputy District Attorney
7 Nevada Bar No. 10113
8 601 N. Pecos Road, #470
9 Las Vegas, NV 89101
10 (702) 455-5320


CLERK OF THE COURT

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EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

In the Matter of the Parental Rights as to:

AAMIYAH DE'NASIA LAMB;
CHRISTOPHER LAMONT BYNUM JR

Minors.

Case No.:
Dept No: D11-446967-12

AFFIDAVIT FOR SERVICE BY PUBLICATION

STATE OF NEVADA)
COUNTY OF CLARK) ss.

I, Sandra Ruedy, do hereby swear under penalty of perjury that the assertions of this affidavit are true.

I am an Administrative Secretary for the Clark County District Attorney's Office, assigned to this case to make diligent efforts to locate all necessary and proper parties to this matter.

On February 4, 2011, AAMIYAH DE'NASIA LAMB and CHRISTOPHER LAMONT BYNUM JR were adjudicated children in need of protection and made Wards of the Eighth Judicial District Court, Juvenile Division, in Case No. J-10-319959-P1, and placed in the legal custody of the Division of Child and Family Services, now known as the Clark County Department of Family Services (hereinafter DFS).

KEAUNDRA LOUISE DEBERRY is the natural mother of AAMIYAH DE'NASIA LAMB. It is unknown whether KEAUNDRA LOUISE DEBERRY was a married woman at the time AAMIYAH DE'NASIA LAMB was born. JOSEPH LAMB is listed as the father of AAMIYAH DE'NASIA LAMB

1 on her State of North Carolina birth certificate. However, because this is an out-of-state birth certificate,
2 Petitioners have no personal knowledge as to how JOSEPH LAMB came to be named on the birth
3 certificate. As such, JOSEPH LAMB is the Putative Father of AAMIYAH DE'NASIA LAMB.
4 However, KEAUNDRA LOUISE DEBERRY has also named VIRGIL GRAVES as a possible father of
5 AAMIYAH DE'NASIA LAMB; therefore VIRGIL GRAVES is also the Putative Father of AAMIYAH
6 DE'NASIA LAMB.

7 KEAUNDRA LOUISE DEBERRY is the natural mother of CHRISTOPHER LAMONT
8 BYNUM JR. It is unknown whether KEAUNDRA LOUISE DEBERRY was a married woman at the
9 time CHRISTOPHER LAMONT BYNUM JR was born. CHRISTOPHER LAMONT BYNUM is listed
10 as the father of CHRISTOPHER LAMONT BYNUM JR on his State of Nevada birth certificate;
11 therefore CHRISTOPHER LAMONT BYNUM is the Legal or Legally Presumed Father of
12 CHRISTOPHER LAMONT BYNUM JR.

13 On May 18, 2011, Affiant thoroughly reviewed online records within the Clark County Marriage
14 Bureau and the Clark County Family Courts and did locate a closed Temporary Protection Order case
15 [06T091887] pertaining to CHRISTOPHER BYNUM, wherein the Extended Order was denied and the
16 Temporary Order expired on May 11, 2006. Affiant also located a closed Child Support case [R-09-
17 149803-R] pertaining to KEAUNDRA DEBERRY and CHRISTOPHER BYNUM. Affiant did not
18 locate any records pertaining to JOSEPH LAMB or VIRGIL GRAVES.

19 Therefore, KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, JOSEPH
20 LAMB, aka JOSEPH NATHANIEL CLARENCE LAMB, VIRGIL GRAVES, CHRISTOPHER
21 LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka
22 CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYNUM,
23 aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS,
24 aka CHRISTOPHER L BYNUM, and any and all other persons claiming to be the father of AAMIYAH
25 DE'NASIA LAMB are proper and necessary parties herein.
26
27
28

////

1 Since the Clark County Department of Family Services was awarded legal custody of
2 AAMIYAH DE'NASIA LAMB and CHRISTOPHER LAMONT BYNUM JR, there have been
3 regularly held six-month reviews. KEAUNDRA LOUISE DEBERRY last participated telephonically
4 in a Court hearing on this matter on April 13, 2011. JOSEPH LAMB has never attended a Court
5 hearing on this matter. CHRISTOPHER LAMONT BYNUM has never attended a Court hearing on this
6 matter. Any other person claiming to be the father of AAMIYAH DE'NASIA LAMB has never
7 attended a Court hearing on this matter.

8 On May 18, 2011, Affiant conducted a search for past or possible present addresses through
9 SCOPE, DMV, and NCJIS in an effort to locate KEAUNDRA LOUISE DEBERRY. Her last known
10 address, as of April 2, 2008, was listed as: 52 Salmon Dr, Apt A, Nellis AFB, NV 89191. (See attached
11 Diligent Search Report and Affidavit of Affiant.)

12 On May 18, 2011, Affiant conducted a search of the Clark County Detention Center, City of Las
13 Vegas Detention Center, City of Henderson Detention Center, City of North Las Vegas Detention
14 Center, Nevada Department of Corrections and the Federal Bureau of Prisons and did not find
15 KEAUNDRA LOUISE DEBERRY to be currently incarcerated in Nevada. (See attached Diligent
16 Search Report and Affidavit of Affiant.)

17 On May 18, 2011, Affiant conducted a search through local directory assistance and did not find
18 a listing for KEAUNDRA LOUISE DEBERRY. (See attached Diligent Search Report and Affidavit of
19 Affiant.)

20 On May 18, 2011, Affiant thoroughly reviewed the DFS Case Worker's file and found the
21 mailing address for KEAUNDRA LOUISE DEBERRY, as of May 2011, listed as: 207 Earhart Ave,
22 Barksdale AFB, LA 71110.

23 Affiant sent a letter to the last known address of KEAUNDRA LOUISE DEBERRY. Affiant
24 has not received any responses to date.

25 On May 18, 2011, Affiant conducted a search for past or possible present addresses through
26 SCOPE, DMV, and NCJIS in an effort to locate JOSEPH LAMB. His last known addresses were listed
27 as: 1) 660 E New Hope Rd, Apt A5, Goldsboro, NC 27534, and 2) 600 Whitfield Dr, Goldsboro, NC
28 27530. The North Carolina Department of Motor Vehicles does not indicate a date that either of these
addresses was last known to be valid, or which address is the most recent. (See attached Diligent Search
Report and Affidavit of Affiant.)

1 On May 18, 2011, Affiant conducted a search of the Clark County Detention Center, City of Las
2 Vegas Detention Center, City of Henderson Detention Center, City of North Las Vegas Detention
3 Center, Nevada Department of Corrections and the Federal Bureau of Prisons and did not find JOSEPH
4 LAMB to be currently incarcerated in Nevada. (See attached Diligent Search Report and Affidavit of
5 Affiant.)

6 On May 18, 2011, Affiant conducted a search through local directory assistance and did not find
7 a listing for JOSEPH LAMB. (See attached Diligent Search Report and Affidavit of Affiant.)

8 On May 18, 2011, Affiant thoroughly reviewed the DFS Case Worker's file and did not locate
9 any address information for JOSEPH LAMB.

10 Affiant sent a letter to the last known address of JOSEPH LAMB. Affiant has not received any
11 responses to date.

12 On May 18, 2011, Affiant conducted a search for past or possible present addresses through
13 SCOPE, DMV, and NCJIS in an effort to locate VIRGIL GRAVES. Affiant did not locate any address
14 information for VIRGIL GRAVES. (See attached Diligent Search Report and Affidavit of Affiant.)

15 On May 18, 2011, Affiant conducted a search of the Clark County Detention Center, City of Las
16 Vegas Detention Center, City of Henderson Detention Center, City of North Las Vegas Detention
17 Center, Nevada Department of Corrections and the Federal Bureau of Prisons and did not find VIRGIL
18 GRAVES to be currently incarcerated in Nevada. (See attached Diligent Search Report and Affidavit of
19 Affiant.)

20 On May 18, 2011, Affiant conducted a search through local directory assistance and did not find
21 a listing for VIRGIL GRAVES. (See attached Diligent Search Report and Affidavit of Affiant.)

22 On May 18, 2011, Affiant thoroughly reviewed the DFS Case Worker's file and found the
23 address for VIRGIL GRAVES, as of March 2011, listed as: 506 16th Ave, Dillon, SC 29536.

24 Affiant sent a letter to the last known address of VIRGIL GRAVES. Affiant has not received
25 any responses to date.

26 On May 18, 2011, Affiant conducted a search for past or possible present addresses through
27 SCOPE, DMV, and NCJIS in an effort to locate CHRISTOPHER LAMONT BYNUM. Affiant did not
28 locate any complete address information for CHRISTOPHER LAMONT BYNUM. (See attached
Diligent Search Report and Affidavit of Affiant.)

1 On May 18, 2011, Affiant conducted a search of the Clark County Detention Center, City of Las
2 Vegas Detention Center, City of Henderson Detention Center, City of North Las Vegas Detention
3 Center, Nevada Department of Corrections and the Federal Bureau of Prisons and did not find
4 CHRISTOPHER LAMONT BYNUM to be currently incarcerated in Nevada. (See attached Diligent
5 Search Report and Affidavit of Affiant.)

6 On May 18, 2011, Affiant conducted a search through local directory assistance and did not find
7 a listing for CHRISTOPHER LAMONT BYNUM. (See attached Diligent Search Report and Affidavit
8 of Affiant.)

9 On May 18, 2011, Affiant thoroughly reviewed the DFS Case Worker's file and found the
10 address for CHRISTOPHER LAMONT BYNUM, as of May 4, 2011, listed as: 10 W End St, Tallulah,
11 LA 71282.

12 Affiant sent a letter to the last known address of CHRISTOPHER LAMONT BYNUM. Affiant
13 has not received any responses to date.


14 Affiant does not know the true identity of the father of AAMIYAH DE'NASIA LAMB, and
15 does not know his true whereabouts or circumstances; therefore, it is necessary to serve all other
16 persons claiming to be the father of AAMIYAH DE'NASIA LAMB, by publication thereof.

17 Affiant submits that due diligence was used to locate KEAUNDRA LOUISE DEBERRY, aka
18 KEAUNDRA DEBERRY, JOSEPH LAMB, aka JOSEPH NATHANIEL CLARENCE LAMB,
19 VIRGIL GRAVES and CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR,
20 aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka
21 CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER
22 BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM within the State of Nevada.
23 Due to their propensity to be transient and avoid contact with DFS, it is difficult to determine their exact
24 location at any given time. Affiant will need an order directing service by publication.

25 WHEREFORE, Affiant prays for an Order of the Court directing that the Notice of Hearing to
26 Terminate Parental Rights be served on KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA
27 DEBERRY, JOSEPH LAMB, aka JOSEPH NATHANIEL CLARENCE LAMB, VIRGIL GRAVES,
28 CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER
BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER
LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka

1 CHRISTOPHER BURKS, aka CHRISTOPHER L BYNUM, and any and all other persons claiming to be
2 the father of AAMIYAH DE'NASIA LAMB, by publication thereof.

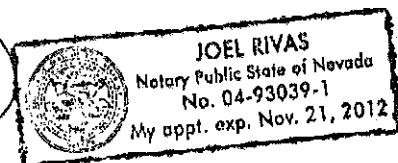
3 Dated: May 19, 2011.

4 
5 Sandra Ruedy, Administrative Secretary
6 Clark County District Attorney

7 Subscribed and Sworn to before me this
8 day of May, 2011.

9 By: Sandra Ruedy

10 NOTARY PUBLIC



DILIGENT SEARCH REPORT

To: Michelle Jordan

Date: May 18, 2011

Case #: J-10-319959-P1

Phone: 702-455-3454

From: Sandi Ruedy, Administrative Secretary
Clark County District Attorney's Office, Juvenile Division

Phone: (702) 455-5320

Children(s) Name(s): Aamiyah De'Nasia Lamb and Christopher Lamont Bynum Jr

Subject Name: Keaundra Louise Deberry (Natural Mother)

Date Of Birth: 11/20/1986

Aka's: Keaundra Deberry

NCJIS Warrants/Warnings: None

Last Known Addresses:

SCOPE: 52 Salmon Dr, Apt A, Nellis AFB, NV 89191 (a/o 04/02/2008)

DMV: 719 Westover Rd, Goldsboro, NC 27534 (a/o 03/17/2008)

DFS Caseworker: Physical Address: 1820 E Texas St, Bossier City, LA 71111 (a/o 04/2011);
Mailing Address: 207 Earhart Ave, Barksdale AFB, LA 71110 (a/o 05/2011)

CCDC/NDOC/LV CITY/NLV CITY/HENDERSON/FED PRISON: Not in Custody

USPS Verified: DFS address is missing an apartment number (will utilize the current mailing address). Others verified through Google search engine (USPS was unable to locate SCOPE & DFS address – Both were located on Air Force Bases).

Other: Clark County Family Court records: 52 Salmon Dr, Apt A, Nellis AFB, NV 89191 (a/o 07/08/2009)

Description/Tattoo's/Scars: B / 5'9" / 200 / Black / Brown

Criminal History: Batt Domestic Viol

CASE CLOSED.

STATE OF NEVADA

ss.

COUNTY OF CLARK

I, SANDRA RUEDY, being duly sworn, and under penalty of perjury, deposes and says:

That I work as an Administrative Secretary for the Clark County District Attorney's Office, Juvenile Division, at 601 N. Pecos, Road, Las Vegas, Nevada.

My duties include locating parents of children who are in the protective custody of the Clark County Department of Family Services.

The name(s) of parent(s) or relative(s) including any alias names was (were) given to me on the 18th day of May, 2011, in order to locate them as necessary parties to an action involving the minor child or children.

The Diligent Search Report explains the efforts I made and the results I obtained to locate the Parties to this action. Said documents were prepared on the date indicated and in the course of regularly conducted procedures for a Diligent Search.

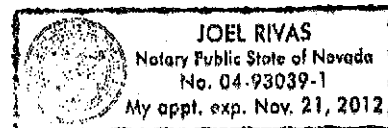

SANDRA RUEDY

SUBSCRIBED and SWORN to before me

this 19th day of May, 2011.

By: Sandra Ruedy


NOTARY PUBLIC



DILIGENT SEARCH REPORT

To: **Michelle Jordan**

Date: **May 18, 2011**

Case #: **J-10-319959-P1**

Phone: **702-455-3454**

From: **Sandi Ruedy, Administrative Secretary**
Clark County District Attorney's Office, Juvenile Division

Phone: **(702) 455-5320**

Children(s) Name(s): **Aamiyah De'Nasia Lamb**

Subject Name: **Joseph Lamb (Putative Father -- out of state birth certificate)**

Date Of Birth: **07/30/1986**

Aka's: **Joseph Nathaniel Clarence Lamb**

NCJIS Warrants/Warnings: **None**

Last Known Addresses:

SCOPE: No Record Found

DMV: NC DMV (2 addresses listed): 1) 660 E New Hope Rd, Apt A5, Goldsboro, NC 27534 (a/o unknown); 600 Whitfield Dr, Goldsboro, NC 27530 (a/o unknown)

DFS Caseworker: Unknown (a/o 05/04/2011)

CCDC/NDOC/LV CITY/NLV CITY/HENDERSON/FED PRISON: Not in custody

USPS Verified: Yes

Other: None

Description/Tattoo's/Scars: **Unknown**

Criminal History: **No Record Found**

CASE CLOSED.

STATE OF NEVADA

ss.

COUNTY OF CLARK

I, SANDRA RUEDY, being duly sworn, and under penalty of perjury, deposes and says:

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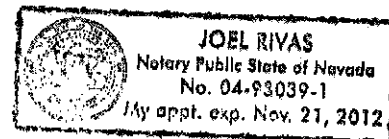
Sandra Ruedy
SANDRA RUEDY

SUBSCRIBED and SWORN to before me

this 19th day of May, 2011.

By: Sandra Ruedy

Joel Rivas
NOTARY PUBLIC



DILIGENT SEARCH REPORT

To: Michelle Jordan

Date: May 18, 2011

Case #: J-10-319959-P1

Phone: 702-455-3454

**From: Sandi Ruedy, Administrative Secretary
Clark County District Attorney's Office, Juvenile Division**

Phone: (702) 455-5320

Children(s) Name(s): Aamiyah De'Nasia Lamb

Subject Name: Virgil Graves (Putative Father)

Date Of Birth: 12/15/1983

Aka's: None

NCJIS Warrants/Warnings: None

Last Known Addresses:

SCOPE: No Record found

DMV: No Record Found

DFS Caseworker: 506 16th Ave, Dillon, SC 29536 (a/o 03/2011)

CCDC/NDOC/LV CITY/NLV CITY/HENDERSON/FED PRISON: Not in Custody

USPS Verified: Yes

Other: None

Description/Tattoo's/Scars: Unknown

Criminal History: No Record Found

CASE CLOSED.

STATE OF NEVADA

ss.

COUNTY OF CLARK

I, SANDRA RUEDY, being duly sworn, and under penalty of perjury, deposes and says:

That I work as an Administrative Secretary for the Clark County District Attorney's Office, Juvenile Division, at 601 N. Pecos, Road, Las Vegas, Nevada.

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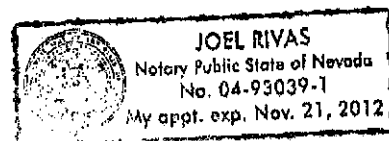
Sandra Ruedy
SANDRA RUEDY

SUBSCRIBED and SWORN to before me

this 19th day of May, 2011.

By: Sandra Ruedy

Joel Rivas
NOTARY PUBLIC



DILIGENT SEARCH REPORT

To: Michelle Jordan Date: May 18, 2011 Case #: J-10-319959-P1
Phone: 702-455-3454
From: Sandi Ruedy, Administrative Secretary
Clark County District Attorney's Office, Juvenile Division
Phone: (702) 455-5320

Children(s) Name(s): Christopher Lamont Bynum Jr
Subject Name: Christopher Lamont Bynum (Legal / Legally Presumed Father)
Date Of Birth: 01/06/1975
Aka's: Christopher L Bynum Sr; Christopher Bynum Sr; Christopher Bynum;
Christopher Burks; Christopher Lamont Byrum; Chriatopher Lamont Bynum;
Chistopher Bynum; Chistopher Burks; Christopher L Bynum

NCJIS Warrants/Warnings: NCJIS Warrants (X2): 1) Record #1990183, Date Issued: 07/31/2010, Offense: Contempt of Court (Original Charge: Convicted Person Fail to Change Address), ORI: NLV Municipal Court 702-633-1130 Ext 6099; 2) Record #1990184, Date Issued: 07/31/2010, Offense: Contempt of Court (Original Charge: Possession of Drug Paraphernalia), ORI: NLV Municipal Court 702-633-1130 Ext 6099; NCIC Wanted Person: Offense: Dangerous Drugs (BW - Poss Cont Sub), Date of Warrant: 09/27/2010, ORI: NLV Police Dept 702-633-1715, Extradition: State of NV; Needles CA; Mohave County AZ; Washington CO UT; Iron County UT

Last Known Addresses:

SCOPE: J St/Owens (Homeless/Transient), LVN (a/o 03/17/2010)
DMV: General Delivery, LVN 89125 (a/o 03/03/2009)
DFS Caseworker: 10 W End St, Tallulah, LA 71282 (a/o 05/04/2011)
CCDC/NDOC/LV CITY/NLV CITY/HENDERSON/FED PRISON: Not in Custody
USPS Verified: SCOPE address was not a valid address. Others verified.

Other: None

Description/Tattoo's/Scars: B / 5'9" / 165 / Black / Brown / TT Back "Feel My Pain" / TT R Arm "Zackeissie Daddy Loves You", "D", Wings / TT R Shoulder - Heart, "Daddy Loves You" / TT L Arm - Drama Masks, "Trust In Man-Betray U Always" / TT Chest "Paulette Paula", "Paulette" with a heart

Criminal History: Felony Convictions: Att GL Auto; Felon Poss F/A; Asslt W/DW; Grand Larc Auto; Burglary (2X); Poss Cont Sub; Poss C/S Marijuana - Criminal History: Con Per FI Chg Add (2X); Poss Narco Paraphernalia; Poss Cont Sub Sch 1-4; Non-Med PCS Less 1oz (2X); Batt Domestic Viol (3X); FTA Poss Narco Paraphernalia; Unl Use/Poss Drug Paraphernalia; Poss Cont Sub (3X); ITS Drugs; Obst Pol Ofer (2X); FTA Non-Med PCS Less 1oz (2X); Asslt W/Dead Weap; Poss F/A By Prohib Person; Obst Publ Ofer; Batt W/Dead Weapon; Aim F/A; Batt (2X); Poss Stolen Prop (2X); Repository PCN (7X); XFEL Poss Conc F/A; Att Burg; Auto Burg; Att Murder W/Dead Weap; Asslt W/Dead Weap; Prob Viol PCS; Poss Cont Sub F/Sale; Evade Pol Ofer; U/Influ Cont Sub; CCW; Trafficking in Cont Sub

CASE CLOSED.

STATE OF NEVADA

ss.

COUNTY OF CLARK


I, SANDRA RUEDY, being duly sworn, and under penalty of perjury, deposes and says:

That I work as an Administrative Secretary for the Clark County District Attorney's Office, Juvenile Division, at 601 N. Pecos, Road, Las Vegas, Nevada.

My duties include locating parents of children who are in the protective custody of the Clark County Department of Family Services.

The name(s) of parent(s) or relative(s) including any alias names was (were) given to me on the 18th day of May, 2011, in order to locate them as necessary parties to an action involving the minor child or children.

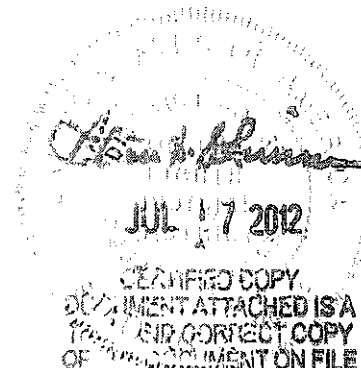
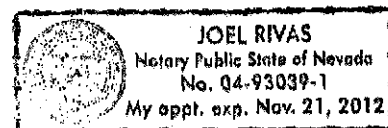
The Diligent Search Report explains the efforts I made and the results I obtained to locate the Parties to this action. Said documents were prepared on the date indicated and in the course of regularly conducted procedures for a Diligent Search.


SANDRA RUEDY

SUBSCRIBED and SWORN to before me
this 19th day of May, 2011.

By: Sandra Ruedy


NOTARY PUBLIC




CLERK OF THE COURT

OSBP
DAVID ROGER
DISTRICT ATTORNEY
Nevada Bar No. 2781
By: Jennifer Kuhlman
Deputy District Attorney
Nevada Bar No. 10113
601 N. Pecos Road, #470
Las Vegas, NV 89101
(702) 455-5320

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

In the Matter of the Parental Rights as to:
AAMIYAH DE'NASIA LAMB,
CHRISTOPHER LAMONT BYNUM, JR.,
Minors.

Case No. D-11- 446967 -R
Department C
Courtroom 8 - Judge Jones

ORDER FOR PUBLICATION OF NOTICE

Upon reading the filed Affidavit of Service by Publication of Sandra Ruedy, it satisfactorily appears that this action was duly and regularly commenced by the filing of a verified Petition to Terminate Parental Rights, that KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES, CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons claiming paternity, are necessary and proper parties to this action and that personal service of the Notice of Hearing to Terminate Parental Rights herein cannot be had on them in the State of Nevada for the reasons hereinafter stated.

It further appears from the papers and pleadings filed that because of their propensity to be transient and avoid contact with the Department of Family Services, it is necessary to serve KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES, CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons claiming paternity by publication thereof.

1 It further appears from the papers and pleadings filed herein that a cause of action for Termination
2 of Parental Rights exists in favor of the Petitioner and against KEAUNDRA LOUISE DEBERRY, aka
3 KEAUNDRA DEBERRY, VIRGIL GRAVES, CHRISTOPHER LAMONT BYNUM, aka
4 CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM,
5 aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER
6 LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER
7 L BYNUM and all other persons claiming paternity.

8 NOW, THEREFORE, IT IS HEREBY ORDERED that the Notice of Hearing to Terminate
9 Parental Rights in this action shall be served upon KEAUNDRA LOUISE DEBERRY, aka
10 KEAUNDRA DEBERRY, VIRGIL GRAVES, CHRISTOPHER LAMONT BYNUM, aka
11 CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM,
12 aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER
13 LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER
14 L BYNUM and all other persons claiming paternity by publication thereof in the Nevada Legal News,
15 hereby designated as the newspaper most likely to give notice of the pendency of this action to them and
16 that the publication be made at least once a week for a period of four weeks and by mailing to their last
17 known address.

18 IT IS FURTHER ORDERED that pursuant to NRS 128.140, the County of Clark be directed to
19 pay the costs of publication for the Notice of Hearing to Terminate Parental Rights.

20 DATED this _____ day of _____

21 Submitted by:
22 DAVID ROGER
23 DISTRICT ATTORNEY

24 By: Jennifer Kuhlman
25 Deputy District Attorney
26 Nevada Bar No. 10113
27 601 N. Pecos Road, #470
28 Las Vegas, NV 89101
(702) 455-5320
JK/jr

District Court Judge

FRANK P. SULLIVAN

JUL 17 2012

CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE

ORIGINAL



CLERK OF THE COURT

1 DAVID ROGER
2 DISTRICT ATTORNEY
3 Mary Brown
4 Deputy District Attorney
5 Juvenile Division
6 Nevada Bar No. 6947
7 601 North Pecos
8 Las Vegas, Nevada 89101
9 (702) 455-5320

7 **EIGHTH JUDICIAL DISTRICT COURT**
8 **FAMILY DIVISION - JUVENILE**
9 **CLARK COUNTY, NEVADA**

10 In the Matter of:

11 AAMIYAH DE NASIA LAMB
12 Date of Birth: 01-04-2004
13 A Minor, 7 Years and 03 Month(s) of
14 Age.

COURT CASE NO.: J-10-319959-P1

DEPT. NO.: C
COURTROOM: 22

15 CHRISTOPHER BYNUM JR.
16 Date of Birth: 03-28-2009
17 A Minor, 2 Year and 00 Months of
18 Age.

17 **OUT-OF-HOME PLACEMENT ORDER - Unlicensed Relative**

19 This matter having come on for Permanency and Placement Review before the
20 Family Court, Eighth Judicial District, County of Clark, State of Nevada, Clark County
21 Department of Family Services, on this 26th day of April, 2011, with parent(s) Keandra
22 DeBerry and Christopher Bynum Sr. not being present in Court, and subject minor(s)
23 being available to the Court, and the Court finding that the minor(s) come(s) within the
24 provisions of NRS 432B.410, 432B.550, 432B.580, 432B.590, and 432B.600, and good
25 cause being shown;
26
27
28

1 **THE COURT FINDS** that continuation of the minor(s) in the home of the
2 parent(s)/guardian(s), Keaundra DeBerry and Christopher Bynum Sr. , is contrary to the
3 welfare of the child(ren);
4

5 **THE COURT FURTHER FINDS** that reasonable efforts have been made as cited
6 in the Permanency and Planning Review Report to prevent or eliminate the need for
7 removal of the child(ren) from their home;

8 **THE COURT FURTHER FINDS** that reasonable efforts have been made as cited
9 in the Permanency and Planning Review Report to make it possible for the child(ren) to
10 return to the home of Keaundra DeBerry and Christopher Bynum Sr. ; accordingly,
11

12 **IT IS HEREBY RECOMMENDED** that AAMIYAH DE NASIA LAMB
13 CHRISTOPHER BYNUM Jr. are made Wards of the Family Court as children in Need of
14 Protection;

15 **IT IS FURTHER RECOMMENDED** that legal custody remains with the Clark
16 County Department of Family Services for placement until AAMIYAH DE NASIA LAMB
17 and CHRISTOPHER BYNUM Jr. reach(es) the statutory age as prescribed by law, or until
18 further Order of the Court. Control and custody is awarded with all necessary authority
19 and power to furnish, provide, and authorize care and services to the subject minor(s) as
20 may seem necessary and proper, and in the child(ren)'s best interest and welfare,
21 including but not limited to: food, clothing, shelter, education, and routine medical care
22 and treatment;
23

24 **IT IS FURTHER RECOMMENDED** that the Clark County Department of Family
25 Services shall have legal authority to access and obtain any records that relate to the
26 child's well being to include but not limited to: medical, dental, educational, mental health,
27 and substance abuse;
28

1 **IT IS FURTHER RECOMMENDED** that the Permanency Plan goal of Adoption as
2 recommended by the Clark County Department of Family Services is in the child(ren)'s
3 best interest and shall be adopted by the Court;

4
5 **IT IS FURTHER RECOMMENDED** that continuation of reasonable efforts to
6 reunify AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM Jr. with Keandra
7 DeBerry and Christopher Bynum Sr. , as required by NRS 432B.393 is consistent with
8 the Permanency Plan;

9 **IT IS FURTHER RECOMMENDED** that the following efforts that have been made
10 by the Clark County Department of Family Services to meet the permanency goal are
11 reasonable efforts:

12
13 **IT IS FURTHER RECOMMENDED** that sibling visitation is not applicable;

14 **IT IS FURTHER RECOMMENDED** that:

15 ☐ Child Support is waived;

16 ☐ Child support is ordered in the amount of \$ _____ for
17

18
19 per child;

20 **IT IS FURTHER RECOMMENDED** that the AAMIYAH DE NASIA LAMB and
21 CHRISTOPHER BYNUM Jr. are placed in the unlicensed relative home of Benita
22 Taylor.

23 **IT IS FURTHER FOUND AND RECOMMENDED** that neither the physical
24 custodian(s) nor the parent(s) may remove the subject minor(s) from the State of Nevada
25 without the written consent of the Clark County Department of Family Services or by
26 Order of the Court;
27
28

1 IT IS FURTHER RECOMMENDED that this matter be reviewed on the 19th
2 day of September, 20 11, at the hour of 2:00 P.m., Department
3 G.
4

5 You are hereby notified that you have a right to a rehearing pursuant to Eighth
6 Judicial District Court Rule 1.46. An application for rehearing must be filed within five days
7 after receipt of the Referee's Findings and Recommendations.

8 Dated this 16 day of May, 20 11.

9
10 [Signature]
11 JUVENILE HEARING MASTER
12

13 IT IS SO ORDERED.

14 Dated this 16 day of May, 20 11.

15 [Signature]
16 DISTRICT JUDGE - JUVENILE
17

18 FRANK P. SULLIVAN

19 Submitted by:

Submitted by:

20 DAVID ROGER
DISTRICT ATTORNEY

21 [Signature]
22 MICHELLE JORDAN
CASE MANAGER
23 DEPARTMENT OF FAMILY SERVICES

21 By [Signature]
22 Deputy District Attorney

24 COURT CASE NO.: J-10-319959-P1

25 Hay servicios gratis de ayuda con otros idiomas. Para pedir un intérprete, llame por favor al Coordinador
26 de Servicios de Intérpretes al 671-4578.

27 Free language assistance services are available. To request an interpreter, please call the Language
28 Assistance Coordinator at 671-4578.

NOH
DAVID ROGER
DISTRICT ATTORNEY
Jennifer Kuhlman
Deputy District Attorney
Nevada Bar No. 10113
601 N. Pecos Road
Las Vegas, NV 89101
(702) 455-5320


CLERK OF THE COURT

**EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA**

In the Matter of the Parental Rights as to)
AAMIYAH DE'NASIA LAMB,) Case No. D-11-446967-R
CHRISTOPHER LAMONT BYNUM, JR.,) Department C
Minors) Courtroom 8 - Judge Jones

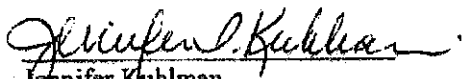
NOTICE OF HEARING TO TERMINATE PARENTAL RIGHTS

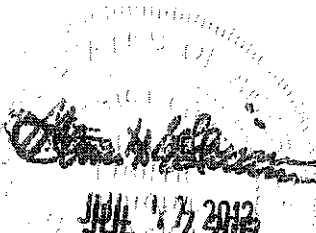
TO: KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL GRAVES, CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR, aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM, aka CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYRUM, aka CHRIATOPHER LAMONT BYNUM, aka CHISTOPHER BYNUM, aka CHISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons claiming paternity.

YOU AND EACH OF YOU ARE HEREBY NOTIFIED that there has been filed in the above-entitled Court, a Petition for the termination of your parental rights over the above-named child and that the Petition for Termination of Parental Rights has been set for hearing before this Court, in the Courtroom thereof, Clark County, Family Court Division, 601 N. Pecos Road, Las Vegas, Nevada, 89101-2417 on Friday the 26th day of August, 2011 at 9:00 a.m. at which time and place you are required to be present if you desire to oppose this Petition.

DATED, this 9th day of June, 2011.

DAVID ROGER
DISTRICT ATTORNEY

By: 
Jennifer Kuhlman
Deputy District Attorney
Nevada No. 10113
601 N. Pecos Road
Las Vegas, Nevada 89101
(702) 455-5320
JK / jr


JUL 17 2012
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TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE

COPY

DO NOT FILE

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION - JUVENILE
CLARK COUNTY, NEVADA

LODGED NOT FILE
SEP 14 2011

In the Matter of:

AAMIYAH LAMB
Date of Birth: 01-04-2004
A Minor 7 years, 08 Months of Age

COURT CASE NO.: J-10-319959-
P1
DEPT.: FAMILY JUVENILE

CHRISTOPHER BYNUM JR.
Date of Birth: 03-28-2009
A Minor 2 Years 06 Months of Age.

Department of Family Services Confidential Report

DATE: 09/14/2011

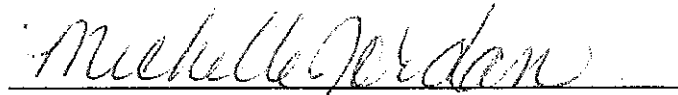
REPORT NAME: PERMANENCY AND PLACEMENT REVIEW

Date of Hearing: 09-15-2011

Time of Hearing: 02:00 PM

Courtroom: JUDGE JONES - #8

Submitted by:



MICHELLE JORDAN
CASE MANAGER
DEPARTMENT OF FAMILY SERVICES

Hay servicios gratis de ayuda con otros idiomas. Para pedir un intérprete, llame por favor al Coordinador de Servicios de Intérpretes al 671-4578.

Free language assistance services are available. To request an interpreter, please call the Language Assistance Coordinator at 671-4578.

CLARK COUNTY
DEPARTMENT OF FAMILY SERVICES
121 SOUTH MARTIN LUTHER KING BLVD.
LAS VEGAS, NEVADA 89106
(702) 455-7200

**EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION - JUVENILE
CLARK COUNTY, NEVADA**

In the Matter of:

AAMIYAH DE NASIA LAMB
Date of Birth: 01-04-2004
A Minor 7 years, 08 Months of Age
CHRISTOPHER BYNUM JR.
Date of Birth: 03-28-2009
A Minor 2 Years 06 Months of Age.

COURT CASE NO.: J-10-319959-P1
DEPT.: FAMILY JUVENILE

REPORT FOR PERMANENCY AND PLACEMENT REVIEW

Date of Hearing: 09-15-2011

Time of Hearing: 02:00 PM

Courtroom: JUDGE JONES - #8

Attachment: "A" Physical Abuse Counseling
"B" Apartment Rental Lease
"C" Proof of Employment with Sonic
"D" Certificate of Completion for
Parenting

CONCERNING:

Father: CHRISTOPHER BYNUM SR
DOB: 01-06-1975

Address: 10 Westend Street, Tallulah, Louisiana, 71282. Mr. Bynum is the father as to minor CHRISTOPHER BYNUM JR. and KEAUNDRE BYNUM. JOSEPH LAMB (Punitive father as to AAMIYAH LAMB) DOB 7/3/86. Last known address: 500 Whitfield Drive, Goldsboro, NC 27530

Mother: KEAUNDRA DEBERRY
DOB: 11-20-1986

Address: 1820 East Texas Street #713, Bossier, LA 71111.
KEAUNDRE BYNUM DOB 12/29/2010 resides with Ms. Deberry. Minor KEAUNDRE is not in custody, the minor's safety is monitored by maternal

Siblings: grandmother Benita Taylor.

- ☒ The Indian Child Welfare Act does not apply.
☐ The Indian Child Welfare Act does apply.

NOTIFICATION OF HEARING AND TYPE OF SERVICE

Mother: Telephone call 318-540-1845
 Father(s): US mail to last known address
 CASA: N/A
 Child's Attorney: N/A
 Mother's: At previous court hearing
 Attorney:
 Father's: N/A
 Attorney:
 Tribe: N/A

REMOVAL DATE:

5/21/2010

TRIAL HOME VISIT DATES:

N/A to ; to

REASON FOR CUSTODY AND COURT JURISDICTION (formally known as Wardship):

Petition #1 dated 05-17-2010 states the following;

The subject minors' mother is KEAUNDRA DEBERRY. The identity of AAMIYAH'S father is unknown to DFS. CHRISTOPHER BYNUM, SR. is the father of CHRISTOPHER, JR. MR. BYNUM was a person found regularly in the home at the time the alleged abuse/neglect occurred for purposes of NRS 432B.130.

(b) MS. DEBERRY physically abused and/or improperly supervised CHRISTOPHER, JR. resulting in CHRISTOPHER, JR. sustaining a triangle shaped burn to his left cheek consistent with the shape of an iron.

(c) MR. BYNUM physically abused and/or improperly supervised CHRISTOPHER, JR. resulting in CHRISTOPHER, JR. sustaining a triangle shaped burn to his left cheek consistent with the shape of an iron.

(d) MS. DEBERRY neglected CHRISTOPHER, JR'S medical needs by failing to seek medical treatment for the burn sustained to his face.

(e) MS. DEBERRY'S drug use adversely affects her ability to provide for the care of the children.

(f) MR. BYNUM neglected CHRISTOPHER, JR'S medical needs by failing to seek medical treatment for the burn sustained to his face.

(g) MR. BYNUM and MS. DEBERRY engage in acts of domestic violence against each other. Their propensity to engage in acts of domestic violence adversely affects their ability to provide for the care of the children.

(h) MS. DEBERRY and MR. BYNUM refused to allow the Department of Family Services access to CHRISTOPHER, JR. in order to access his safety. Additionally, while knowing there was an open investigation, MS. DEBERRY and MR. BYNUM left Clark County, Nevada and fled to Louisiana.

(i) MR. BYNUM is a registered felon for: Felon in Possession of a Firearm; Assault with a Deadly Weapon; Possession of a Controlled Substance; Possession of Marijuana.

DEBERRY J-10-319959-P1

(j) MR. BYNUM'S drug use adversely affects his ability to provide for the care of the children.

PREVIOUS COURT ORDER DEEMED EFFORTS BY THE DEPARTMENT TO ACHIEVE THE PERMANENCY PLAN:

☒ Were Reasonable Efforts

For: AAMIYAH LAMB and
CHRISTOPHER BYNUM JR.

☐ Were Not Reasonable Efforts

For:

PERMANENCY GOAL AND PROJECTED DATE OF ACHIEVEMENT:

☐ Reunification

With:

☒ Termination of Parental Rights and Adoption

By: Adoption by Relative.

☐ Guardianship

By:

☐ Long Term Relative Placement

With:

☐ Other Planned Permanent Living

With:

Arrangement

Projected Date of Achievement:

03/15/2012

CONCURRENT PERMANENCY GOAL:

☒ Reunification

With: Natural mother.

☐ Termination of Parental Rights and Adoption

By:

☐ Guardianship

By:

☐ Long Term Relative Placement

With:

☐ Other Planned Permanent Living

With:

Arrangement

RATIONALE FOR PERMANENCY PLAN:

On 04-27-2010 the CPS hotline received a report regarding CHRISTOPHER BYNUM Jr. regarding a burn that the minor sustained from a clothing iron to his cheek. The natural parents refused CPS access to CHRISTOPHER BYNUM Jr. and later absconded to Louisiana with minors AAIMAYAH LAMB and CHRISTOPHER BYNUM Jr. The natural parents did not seek immediate medical care for CHRISTOPHER.

Ms. DeBerry actively participated in physical abuse counseling with Andrea N. Pharr, through Contemporary Quality Care, LLC in the State of Louisiana. Dr. Pharr reports that Ms. DeBerry displays an understanding of the concepts of physical abuse with greater insight into the affects of physical and mental abuse. On May 11, 2010 Dr. Thomas A. Neumann in Tallulah, Louisiana examined CHRISTOPHER BYNUM Jr. and reports that the injury is well healed with no evidence of abuse. Ms. Deberry acknowledge her negligence and admits that she improperly supervised her son CHRISTOPHER BYNUM Jr., thereby leaving him vulnerable and at risk for harm and danger; causing him to sustain the injury to his face.

Ms. DeBerry cooperates with the Department of Family Services and maintains regular contact with the assigned case worker. She has successfully completed her case plan and has the knowledge and tools to effectively parent her children.

PARENTS' PROGRESS:

Visitation: Natural parents have supervised visits court ordered visits with the minors 2x per week. Careprovider reports that the visits are without incident.

Housing: Natural mother resides in Boisser, Louisiana. Biological and punitive fathers have not submitted proof of residency.

Employment: Natural mother is employed by Sonic in Louisiana. Biological and punitive fathers have not submitted proof of employment.

Counseling: Natural mother has completed Parent course work. Biological and punitive fathers have not submitted proof of Parenting sessions.

Parenting: Natural mother completed strengthening the Families Parent's Training Course through The Community Support Program in Louisiana. Biological and punitive fathers have not submitted proof of Parenting Course Work.

Other:

CHILD(REN)'S CURRENT PLACEMENT:

AAMIYAH and CHRISTOPHER are placed with their maternal grandparents in Barksdale Louisiana.

This placement is within close proximity to the parent(s) for AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM Jr.

This placement is the least restrictive for AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM Jr..

CHILD(REN)'S WELL BEING:

Education – AAMIYAH is in the 2nd grade at Waller Elementary School. AAMIYAH is an "A" student in Math, Reading and Spelling. AAMIYAH's educator reports that she is motivated, interested, responsive, courteous and respectful of authority.

CHRISTOPHER is not school age.

Placement – AAMIYAH and CHRISTOPHER are placed with their maternal grandparents in Barksdale Louisiana.

Emotional/Counseling – AAMIYAH is referred for an assessment to address signs of stress and frustration caused by the separation from her mother.

Medical/Dental – The minors are current on routine medical and dental care.

Safety – The minors are monitored by ICPC worker in Louisiana to ensure their safety and well-being. There are no reports of safety concerns in this placement.

SIBLING CONTACT:

- ☒ Placed Together
☐ Not Placed Together –

REASONABLE EFFORTS TO ACHIEVE THE PERMANENCY PLAN:**On behalf of the parents:**

1. Maintain contact with natural mother for case plan compliance.
2. Attempt to contact biological and punitive fathers via mail.
3. Request reports from Service Providers in Louisiana.
4. Maintain contact with care providers to ensure the safety and well-being of the minors.
5. Arrange supervised visits with minors.
6. Inquire about the well-being of non-custody minor 1 year-old KEAUNDRE BYNUM.

On behalf of the child(ren):

7. Obtain reports from ICPC workers in Louisiana.
8. Maintain contact with care providers.
9. Refer to ICPC for foster care license.
10. Arrange supervised visits with natural parents.
11. Maintain contact with natural parents.
12. Refer case to District Attorney for TPR.

13. Submit referral for financial assistance for care providers.
14. Arrange visits with 1 year-old sibling KEAUNDRE BYNUM.

GOALS FOR THE NEXT REVIEW PERIOD:

- A. Home trial visit for possible reunification with natural mother.
B. TPR with adoption by maternal grandparents.

SUMMARY AND RECOMMENDATIONS:

Ms. DeBerry complies with the Department of Family Services and maintains regular contact with her assigned case worker. Ms. DeBerry has successfully completed her case plan and has the knowledge and tools to effectively parent her children. Natural mother has diligently worked to complete her case plan and regain custody of her children. The Department of Family Services recommends postponement of TPR and lifting the supervised visit order as it pertains to the natural mother.

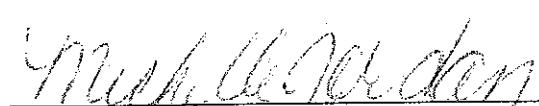
CHILD SUPPORT:

Mr. Bynum is ordered to pay \$100.00 per month.

**WHEREFORE, DEPARTMENT OF FAMILY SERVICES RESPECTFULLY
RECOMMENDS:**

- (1) That AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM Jr. remain under the jurisdiction of the Family Court and in the legal custody of the Clark County Department of Family Services;
- (2) That the efforts made by the Department of Family Services are found to be reasonable efforts as outlined in this report;
- (3) That the child support addendum(a) filed with this Court remain in effect.
- (4) That this matter be brought back for Formal Review in six months.

Submitted By:


MICHELLE JORDAN
CASE MANAGER
CLARK COUNTY
DEPARTMENT OF FAMILY SERVICES
121 SOUTH MARTIN LUTHER KING BLVD.
LAS VEGAS, NEVADA 89106


CHERYL COOKE
SUPERVISOR

DATE: 09/13/2011
COURT CASE NO.: J-10-319959-P1

HOMEWOOD, CROSS COUNTRY, COURT YARD APARTMENT RENTAL LEASE

Apartment agents (Hereinafter referred to as Lesser) hereby leases to Kealundra Lebern (Hereinafter referred to as Lessee), the described property (Hereinafter referred to as Premises)

The term, Lessee in this contract refers to ALL residents listed and visitors. Unless otherwise stated. The apartments will be occupied by residents listed. Herein, person **NOT** listed on this lease agreement may **NOT** stay in the Apartment for more than two (2) consecutive days without the written consent Of management, and no more than twice that many days in a calendar days in a month

Premises- Apartment # 713 located at 1820 East Texas Street or 1900 East Texas Street in Bossier City, Bossier Parish, Louisiana 71111 for use by Lessee as a private residence only.

Term- This for a term commencing on the 23 day of Feb. 20 10. Ending on the 23 day of March 20 10.

Automatic Renewal- This lease will automatically renew for an additional term of 6 months, at the expiration of it's initial term or subsequent term(s) unless either party gives written notice to the other at least 30-days in advance of the expiration that it intends

To terminate lease. This provision is a continuing one which applies to the expiration of The initial term, and each subsequent term. Residents move-out notice May not terminate the lease sooner than the lease term or renewal period. Verbal move-out is **not sufficient**. **If Lessee fails to give a two (2) week written notice, Lessee shall forfeit all deposits paid to Homewood Cross Country, or Court Yard Apartments** Either party, Lessee or Lesser, wishing to terminate the lease is responsible for delivering the written notice to the other.

Rent- This lease is made for in consideration of a weekly rental of \$ 200.00. Per week. Payable with money order, cashiers check, credit or debit card, or cash. **Lessee agrees to pay a \$25.00 late fee for any rental payment that is not received by close of the day on due date on monthly and weekly rental agreements** in addition to the rent payment, which will be considered delinquent. Should Lessee make any payment not honored on presentation to its bank for **any reason whatsoever**, then Lessee agrees to **pay additional \$45.00** fee as a penalty.

Security Deposit- Upon execution of this lease contract, Lessee agrees to deposit with Lesser, the receipt which is hereby acknowledged as a sum of \$ 250

Community Support Programs, Inc.

Presents This Certificate To

Reaundra DeBerry

In Recognition of Completion of the
Community Support Programs, Inc.

Strengthening The Families Parent's Training Course

Angela Hines
Facilitator

July 1, 2011
Date

AOS
DAVID ROGER
District Attorney
Nevada State Bar No. 2781
By: Jennifer Kuhlman
Deputy District Attorney
Juvenile Division
Nevada Bar No. 10113
601 N. Pecos
Las Vegas, NV 89101
(702) 455-5320


CLERK OF THE COURT

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

In the Matter of the Parental Rights as to:

AAMIYAH DE'NASIA LAMB,
CHRISTOPHER LAMONT BYNUM, JR.,

Case No. D-11-446967-R
Department C

Minors

AFFIDAVIT OF SERVICE BY CERTIFIED MAILING

Date of Hearing: 08/26/2011

Time of Hearing: 9:00 AM

STATE OF NEVADA }
COUNTY OF CLARK } ss.

I, Joel Rivas, do hereby swear under penalty of perjury that the assertions of this affidavit are true:

Affiant is and was when the mailing took place, a citizen of the United States, over twenty-one years of age, not a party to or interested in the proceeding in which this affidavit is made.

That affiant deposited in the U.S. Mail at Las Vegas, Nevada, a copy of the PETITION TO TERMINATE PARENTAL RIGHTS and NOTICE OF HEARING on the 15th day of June, 2011 directed to:

Keaundra Deberry
207 Earhart Ave.
Barksdale AFB, LA 71110
Tracking # 91 7108 2133 3938 9426 6939

Keaundra Deberry
1820 East Texas St.
Bossier City, LA 71111
Tracking # 91 7108 2133 3938 9426 6922

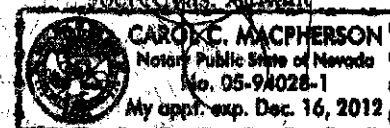
Joseph Lamb
600 Whitfield Dr,
Goldsboro, NC 27530
Tracking # 91 7108 2133 3938 9426 6892

Virgil Graves
506 16th Ave.,
Dillon, SC 29536
Tracking # 91 7108 2133 3938 9426 6915

Christopher Bynum
10 W End St.
Tallulah, LA 71282
Tracking # 91 7108 2133 3938 9426 6908

SUBSCRIBED and SWORN before
Me this 15th day of June, 2011


NOTARY PUBLIC




CLERK OF THE COURT

Affidavit of Publication

STATE OF NEVADA)
COUNTY OF CLARK)

SS

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

Case No. D 446967 Department C Courtroom 8 - Judge Jones
In the Matter of the Parental Rights as to AAMIYAH DE'NASIA LAMB,
CHRISTOPHER LAMONT BYNUM, JR. Minors
NOTICE OF HEARING TO TERMINATE PARENTAL RIGHTS
TO: KEAUNDRA LOUISE DEBERRY, aka KEAUNDRA DEBERRY, VIRGIL
GRAVES, CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER L BYNUM SR,
aka CHRISTOPHER BYNUM SR, aka CHRISTOPHER BYNUM, aka
CHRISTOPHER BURKS, aka CHRISTOPHER LAMONT BYNUM, aka
CHRISTOPHER LAMONT BYNUM, aka CHRISTOPHER BYNUM, aka
CHRISTOPHER BURKS, aka CHRISTOPHER L BYNUM and all other persons
claiming paternity. YOU AND EACH OF YOU ARE HEREBY NOTIFIED that there
has been filed in the above-entitled Court, a Petition for the termination of your
parental rights over the above-named child and that the Petition for Termination of
Parental Rights has been set for hearing before this Court, in the Courtroom thereof,
Clark County, Family Court Division, 601 N. Pecos Road, Las Vegas, Nevada,
89101-2417 on Friday the 26th day of August 2011 at 9:00 a.m. at which time and
place you are required to be present if you desire to oppose this Petition. DATED,
this 9th day of June, 2011. DAVID ROGER, DISTRICT ATTORNEY, By: Jennifer
Kuhlman, Deputy District Attorney, Nevada No. 10113, 601 N. Pecos Road, Las
Vegas, Nevada 89101. (702) 455-5320, JK / jr
Published in Nevada Legal News
June 13, 20, 27, July 5, 2011

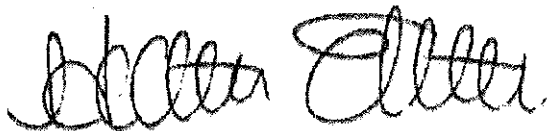
I, Heather Ebner state:

That I am Assistant Operations Manager of the Nevada
Legal News, a daily newspaper of general circulation,
printed and published in Las Vegas, Clark County,
Nevada; that the publication, a copy of which is attached
hereto, was published in the said newspaper on the
following dates:

Jun 13, 2011
Jun 20, 2011
Jun 27, 2011
Jul 05, 2011

That said newspaper was regularly issued and circulated
on those dates. I declare under penalty of perjury that the
foregoing is true and correct.


DATED: Jul 05, 2011



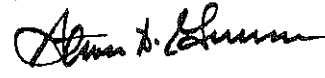
Heather Ebner

01100253 00284322 455-5878

BRENDA
DAVID ROGER, DISTRICT ATTORNEY
601 N. PECOS, STE. 470
LAS VEGAS, NV 89101-2408


JUL 17 2012
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TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE

1 DAVID ROGER
2 DISTRICT ATTORNEY
3 Jennifer Kuhlman
4 Deputy District Attorney
5 Juvenile Division
6 Nevada Bar No. 10113
601 North Peños
Las Vegas, Nevada 89101
(702) 455-5320


CLERK OF THE COURT

ORIGINAL

7 **EIGHTH JUDICIAL DISTRICT COURT**
8 **FAMILY DIVISION - JUVENILE**
9 **CLARK COUNTY, NEVADA**

10 In the Matter of:

11 AAMIYAH DE NASIA LAMB ✓
12 Date of Birth: 01-04-2004
13 A Minor, 7 Years and 08 Month(s) of
14 Age.

COURT CASE NO.: J-10-319959-P1
DEPT.: FAMILY JUVENILE
COURTROOM: HM FEMIANO - #22

15 CHRISTOPHER BYNUM JR. ✓
16 Date of Birth: 03-28-2009
17 A Minor 2 Years 06 Months of Age.

18 **OUT-OF-HOME PLACEMENT ORDER - Unlicensed Relative**

19 This matter having come on for Permanency and Placement Review before the
20 Family Court, Eighth Judicial District, County of Clark, State of Nevada, Clark County
21 Department of Family Services, on this 15th day of September, 2011, with parent(s)
22 Keaundra DeBerry and Christopher Bynum Sr. not being present in Court, and subject
23 minor(s) being available to the Court, and the Court finding that the minor(s) come(s)
24 within the provisions of NRS 432B.410, 432B.550, 432B.580, 432B.590, and 432B.600,
25 and good cause being shown;

26
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28 SEP 29 2011
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1 **THE COURT FINDS** that continuation of the minor(s) in the home of the
2 parent(s)/guardian(s), DEBERRY, KEAUNDRA and Christopher Bynum Sr. , is contrary
3 to the welfare of the child(ren);
4

5 **THE COURT FURTHER FINDS** that reasonable efforts have been made as cited
6 in the Permanency and Planning Review Report to prevent or eliminate the need for
7 removal of the child(ren) from DEBERRY, KEAUNDRA and Christopher Bynum Sr.
8 home;

9 **THE COURT FURTHER FINDS** that reasonable efforts have been made as cited
10 in the Permanency and Planning Review Report to make it possible for the child(ren) to
11 return to the home of DEBERRY, KEAUNDRA ; accordingly,
12

13 **IT IS HEREBY RECOMMENDED** that AAMIYAH DE NASIA LAMB and
14 CHRISTOPHER BYNUM JR. are continued as Wards of the Family Court as children in
15 Need of Protection;

16 **IT IS FURTHER RECOMMENDED** that legal custody remains with the Clark
17 County Department of Family Services for placement until AAMIYAH DE NASIA LAMB
18 and CHRISTOPHER BYNUM JR. reach(es) the statutory age as prescribed by law, or
19 until further Order of the Court. Control and custody is awarded with all necessary
20 authority and power to furnish, provide, and authorize care and services to the subject
21 minor(s) as may seem necessary and proper, and in the child(ren)'s best interest and
22 welfare, including but not limited to: food, clothing, shelter, education, and routine medical
23 care and treatment;
24

25 **IT IS FURTHER RECOMMENDED** that the Clark County Department of Family
26 Services shall have legal authority to access and obtain any records that relate to the
27 child's well being to include but not limited to: medical, dental, educational, mental health,
28 and substance abuse;

1 **IT IS FURTHER RECOMMENDED** that the Permanency Plan goal of Adoption as
2 recommended by the Clark County Department of Family Services is in the child(ren)'s
3 best interest and shall be adopted by the Court;
4

5 **IT IS FURTHER RECOMMENDED** that continuation of reasonable efforts to
6 reunify AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM JR. with DEBERRY,
7 KEAUNDRA , as required by NRS 432B.393 is consistent with the Permanency
8 Plan;
9

10 **IT IS FURTHER RECOMMENDED** that the following efforts that have been made
11 by the Clark County Department of Family Services to meet the permanency goal are
12 reasonable efforts:

- 13 1. Maintain contact with natural mother for case plan compliance.
- 14 2. Attempt to contact biological and punitive fathers via mail.
- 15 3. Request reports from Service Providers in Louisiana.
- 16 4. Maintain contact with care providers to ensure the safety and well-being of the minors.
- 17 5. Arrange supervised visits with minors.
- 18 6. Inquire about the well-being of non-custody minor 1 year-old KEAUNDRE BYNUM.
- 19 7. Obtain reports from ICPC workers in Louisiana.
- 20 8. Maintain contact with care providers.
- 21 9. Refer to ICPC for foster care license.
- 22 10. Arrange supervised visits with natural parents.
- 23 11. Maintain contact with natural parents.
- 24 12. Refer case to District Attorney for TPR.
- 25
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1 **IT IS FURTHER RECOMMENDED** that sibling visitation is not applicable;

2 **IT IS FURTHER RECOMMENDED** that:

3 ☐ Child Support is waived;

4 ☐ Child support is ordered in the amount of \$_____ for

5 _____
6
7 per child;

8 **IT IS FURTHER RECOMMENDED** that the AAMIYAH DE NASIA LAMB and
9 CHRISTOPHER BYNUM JR. is placed in the unlicensed relative home of Clifford and
10 Benita Taylor.

11 **IT IS FURTHER FOUND AND RECOMMENDED** that neither the physical
12 custodian(s) nor the parent(s) may remove the subject minor(s) from the State of Nevada
13 without the written consent of the Clark County Department of Family Services or by
14 Order of the Court;
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2 **IT IS FURTHER RECOMMENDED** that this matter be reviewed on the 22

3 day of March, 20 12, at the hour of 1:30 p.m., Department
4 G.

5
6 You are hereby notified that you have a right to a rehearing pursuant to Eighth
7 Judicial District Court Rule 1.46. An application for rehearing must be filed within five days
8 after receipt of the Referee's Findings and Recommendations.

9
10 Dated this 27th day of September, 20 11.

11
12 Jane Huano
13 JUVENILE HEARING MASTER

14 **IT IS SO ORDERED.**

15 Dated this _____ day of SEP 29 2011, 20 _____.

16
17 [Signature]
18 DISTRICT JUDGE - JUVENILE

19 STEVEN E. JONES
20 Submitted by: STEVEN E. JONES

21 Submitted by:

22 DAVID ROGER
23 DISTRICT ATTORNEY

24 Michelle Jordan
25 MICHELLE JORDAN
26 CASE MANAGER
27 DEPARTMENT OF FAMILY SERVICES

28 By: Jennifer J. Kerkman
Deputy District Attorney

COURT CASE NO.: J-10-319959-P1

DISTRICT COURT
CLARK COUNTY, NEVADA

Alvin L. Johnson
CLERK OF THE COURT

IN THE MATTER OF THE PARENTAL
RIGHTS OF:

CASE NO: D-11-446967-R

AAMIYAH LAMB, CHRISTOPHER BYNUM, JR.,
MINOR(S).

DEPARTMENT C

NOTICE OF RESCHEDULING OF HEARING

Please be advised that the date and time of a hearing set before the Honorable STEVEN
E JONES has been changed. The Non-Jury Trial, presently scheduled for January 23,
2012, at 1:30 PM, has been rescheduled to the 30th day of January, 2012, at 1:30 PM.

HONORABLE STEVEN E JONES

By: *Connie Avila*

Connie Avila
Judicial Executive Assistant

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CERTIFICATE OF MAILING

I hereby certify that on the above file stamped date:

☐ I mailed, via first-class mail, postage fully prepaid the foregoing Notice of Rescheduling of Hearing to:

☒ I placed a copy of the foregoing Notice of Rescheduling of Hearing in the appropriate attorney folder located in the Clerk of the Court's Office:

Jennifer I. Kuhlman, DDA

Romeo R. Perez, Esq.

Connie Avila

Connie Avila
Judicial Executive Assistant
Department C

SAO
MARY-ANNE MILLER
Interim District Attorney
Nevada State Bar No. 1419
By: JENNIFER KUHLMAN
Deputy District Attorney
Juvenile Division
Nevada Bar No. 10113
601 N. Pecos
Las Vegas, NV 89101
(702) 455-3320


CLERK OF THE COURT

ORIGINAL

DISTRICT COURT
FAMILY DIVISION
CLARK COUNTY, NEVADA

In the Matter of the Parental Rights as to

AAMIYAH DE'NASIA LAMB,
CHRISTOPHER LAMONT BYNUM, JR.,

Minors.

Case No. D-11-446967-R
Department C
Courtroom 8

**STIPULATION AND ORDER TO CONTINUE
THE TERMINATION OF PARENTAL RIGHTS PETITION**

Date of Hearing: January 30, 2012
Time of Hearing: 1:30 p.m.

COMES NOW the Petitioner, the Clark County Department of Family Services, by and through supervisor MICHELLE JORDAN, the Clark County District Attorney's Office, by and through JENNIFER KUHLMAN, Deputy District Attorney, and ROMEO PEREZ, ESQ., counsel for the mother KEAUNDRA DEBERRY and Stipulate to the following:

1. This matter was set for trial on January 25, 2012 and the court recently issued a notice of rescheduling of hearing to move the trial date to January 30, 2012.
2. The mother, KEAUNDRA DEBERRY, resides in Louisiana and needs sufficient time to make travel arrangements to appear for the trial.

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1 3. The parties hereby stipulate to continuance of this matter and request that the Court set
2 this matter out at least 60 days for a new trial date to allow sufficient time for the mother
3 to make the appropriate travel arrangements. Counsel requests this matter be re-set on a
4 Tuesday or Friday to avoid potential conflicts with other cases.

5
6
7 Dated: 1-20-12
8 By: [Signature]
9 ROMEO PEREZ, ESQ.
Attorney for KEAUNDRA DEBERRY

Dated: 1/20/12
By: [Signature]
JENNIFER KUHLMAN
Deputy District Attorney
Attorney for the State

10
11 **ORDER**

12 Pursuant to stipulation and good cause appearing,

13 **IT IS HEREBY ORDERED** that the trial set for January 30, 2012 is vacated and the
14 matter is re-set for trial on 4-6, 2012 at 9am.

15 DATED this JAN 24 2012, 2012.

16
17
18
19 Submitted by:

20 MARY-ANNE MILLER
21 Interim District Attorney

22 By: [Signature]
23 JENNIFER KUHLMAN
24 Nevada Bar No. 10113
25 Deputy District Attorney
26 601 N. Pecos
27 Las Vegas, NV 89101
28

[Signature]
DISTRICT COURT JUDGE
STEVEN E. JONES

[Signature]
JUL 7 2012
CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE

ORIGINAL

FILED

CLARK COUNTY
DEPARTMENT OF FAMILY SERVICES
121 SOUTH MARTIN LUTHER KING BLVD.
LAS VEGAS, NEVADA 89106
(702) 455-7200

MAR 7 11 55 AM '12

**EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION - JUVENILE
CLARK COUNTY, NEVADA**

In the Matter of:

AAMIYAH DE NASIA LAMB
Date of Birth: 01-04-2004
A Minor 7 years, 02 Months of Age
CHRISTOPHER BYNUM JR.
Date of Birth: 03-28-2009
A Minor 3 Years Months of Age.

COURT CASE NO.: J-10-319959-P1
DEPT.: FAMILY JUVENILE

REPORT FOR PERMANENCY AND PLACEMENT REVIEW

Date of Hearing: 3/22/2012.

Time of Hearing: 1:30PM

Courtroom: HM FEMIANO - #22

Attachment:

CONCERNING:

Father: CHRISTOPHER BYNUM SR

DOB: 01-06-1975

Address: 10 Westend Street, Tallulah, Louisiana, 71282. Mr. Bynum is the father as to minor CHRISTOPHER BYNUM JR. and KEAUNDRE BYNUM.

JOSEPH LAMB (Punitive father as to AAMIYAH LAMB) DOB 7/3/86.

Last known address: 500 Whitfield Drive, Goldsboro, NC 27530

Mother: KEAUNDRA DEBERRY

DOB: 11-20-1986

Address: 1820 East Texas Street #713, Bossier, LA 71111.

KEAUNDRE BYNUM DOB 12/29/2010 resides with Ms. Deberry. Minor

KEAUNDRE is not in custody, the minor's safety is monitored by maternal

Siblings: grandmother Benita Taylor.

DEBERRY-J-10-319959-P1

☒ The Indian Child Welfare Act does not apply.

☐ The Indian Child Welfare Act does apply.

1
2 **NOTIFICATION OF HEARING AND TYPE OF SERVICE**

3 Mother: Telephone call 318-540-1845 (Phone not accepting calls 3/6/12)
4 Father(s): US mail to last known address
5 CASA: N/A
6 Child's Attorney: N/A
7 Mother's Attorney: At previous court hearing
8 Father's Attorney: N/A
9 Tribe: N/A

10 **REMOVAL DATE:**

11 5/21/2010

12 **TRIAL HOME VISIT DATES:**

13 N/A to ; to

14 **REASON FOR CUSTODY AND COURT JURISDICTION (formally known as Wardship):**

15 Petition #1 dated 05-17-2010 states the following;

16 The subject minors' mother is KEAUNDRA DEBERRY. The identity of AAMIYAH'S
17 father is unknown to DFS. CHRISTOPHER BYNUM, SR. is the father of
18 CHRISTOPHER, JR. MR. BYNUM was a person found regularly in the home at the
19 time the alleged abuse/neglect occurred for purposes of NRS 432B.130.

20 (b) MS. DEBERRY physically abused and/or improperly supervised CHRISTOPHER,
21 JR. resulting in CHRISTOPHER, JR. sustaining a triangle shaped burn to his left cheek
22 consistent with the shape of an iron.

23 (c) MR. BYNUM physically abused and/or improperly supervised CHRISTOPHER, JR.
24 resulting in CHRISTOPHER, JR. sustaining a triangle shaped burn to his left cheek
25 consistent with the shape of an iron.

26 (d) MS. DEBERRY neglected CHRISTOPHER, JR'S medical needs by failing to seek
27 medical treatment for the burn sustained to his face.

28 (e) MS. DEBERRY'S drug use adversely affects her ability to provide for the care of the
children.

(f) MR. BYNUM neglected CHRISTOPHER, JR'S medical needs by failing to seek
medical treatment for the burn sustained to his face.

(g) MR. BYNUM and MS. DEBERRY engage in acts of domestic violence against each
other. Their propensity to engage in acts of domestic violence adversely affects their
ability to provide for the care of the children.

DEBERRY-J-10-319959-P1

(h) MS. DEBERRY and MR. BYNUM refused to allow the Department of Family
Services access to CHRISTOPHER, JR. in order to access his safety. Additionally,

1 while knowing there was an open investigation, MS. DEBERRY and MR. BYNUM left
2 Clark County, Nevada and fled to Louisiana.

3 (i) MR. BYNUM is a registered felon for: Felon in Possession of a Firearm; Assault
4 with a Deadly Weapon; Possession of a Controlled Substance; Possession of
Marijuana.

DEBERRY J-10-319959-P1

5 (j) MR. BYNUM'S drug use adversely affects his ability to provide for the care of the
6 children.

7
8 **PREVIOUS COURT ORDER DEEMED EFFORTS BY THE DEPARTMENT TO**
9 **ACHIEVE THE PERMANENCY PLAN:**

10 ☒ Were Reasonable Efforts

For: AAMIYAH LAMB and
CHRISTOPHER BYNUM JR.

11 ☐ Were Not Reasonable Efforts

For:

12 **PERMANENCY GOAL AND PROJECTED DATE OF ACHIEVEMENT:**

13 ☐ Reunification

With:

14 ☒ Termination of Parental Rights and Adoption

By: Adoption by Relative.

15 ☐ Guardianship

By:

16 ☐ Long Term Relative Placement

With:

17 ☐ Other Planned Permanent Living

With:

Arrangement

Projected Date of Achievement:

03/15/2012

18 **CONCURRENT PERMANENCY GOAL:**

19 ☐ Reunification

With: .

20 ☐ Termination of Parental Rights and Adoption

By:

21 ☐ Guardianship

By:

22 ☐ Long Term Relative Placement

With:

23 ☐ Other Planned Permanent Living

With:

Arrangement

24 **RATIONALE FOR PERMANENCY PLAN:**

25 On 04-27-2010 the CPS hotline received a report regarding CHRISTOPHER BYNUM
26 Jr. regarding a burn that the minor sustained from a clothing iron to his cheek. The
27 natural parents refused CPS access to CHRISTOPHER BYNUM Jr. and later
28 absconded to Louisiana with minors AAIMAYAH LAMB and CHRISTOPHER BYNUM
Jr. The natural parents did not seek immediate medical care for CHRISTOPHER.

DEBERRY-J-10-319959-P1

Ms. DeBerry actively participated in physical abuse counseling with Andrea N. Pharr,
through Contemporary Quality Care, LLC in the State of Louisiana. Dr. Pharr reports

1 that Ms. DeBerry displays an understanding of the concepts of physical abuse with
2 greater insight into the affects of physical and mental abuse. On May 11, 2010 Dr.
3 Thomas A. Neumann in Tallulah, Louisiana examined CHRISTOPHER BYNUM Jr. and
4 reports that the injury is well healed with no evidence of abuse. Ms. Deberry
5 acknowledge her negligence and admits that she improperly supervised her son
6 CHRISTOPHER BYNUM Jr., thereby leaving him vulnerable and at risk for harm and
7 danger; causing him to sustain the injury to his face.

8 Ms. DeBerry has cooperated with the Department of Family Services and maintains
9 regular contact with the assigned case worker. She has completed her case plan,
10 however it continues to remain concerning that Ms. Deberry has the knowledge and
11 tools to effectively parent her children but cannot articulate on how she can keep them
12 safe. Two qualities with significant differences considering this was a physical injury
13 case where here son was burned and she failed to protect him at that time.

14 **PARENTS' PROGRESS:**

15 **Visitation:** Natural parents have supervised visits court ordered visits with the minors
16 2x per week. Careprovider reports that the visits are without incident.

17 **Housing:** Natural mother resides in Boisser, Louisiana. Biological and punitive fathers
18 have not submitted proof of residency.

19 **Employment:** Natural mother is employed by Sonic in Louisiana. Biological and
20 punitive fathers have not submitted proof of employment.

21 **Counseling:** Natural mother has completed Parent course work. Biological and
22 punitive fathers have not submitted proof of Parenting sessions.

23 **Parenting:** Natural mother completed strengthening the Families Parent's Training
24 Course through The Community Support Program in Louisiana. Biological and punitive
25 fathers have not submitted proof of Parenting Course Work.

26 **Other:**

27 **CHILD(REN)'S CURRENT PLACEMENT:**

28 AAMIYAH and CHRISTOPHER are placed with their maternal grandparents in
Barksdale Louisiana.

This placement is within close proximity to the parent(s) for AAMIYAH DE NASIA
LAMB and CHRISTOPHER BYNUM Jr.

This placement is the least restrictive for AAMIYAH DE NASIA LAMB and
CHRISTOPHER BYNUM Jr..

CHILD(REN)'S WELL BEING:

Education – AAMIYAH is in the 2nd grade at Waller Elementary School. AAMIYAH is an "A" student in Math, Reading and Spelling. AAMIYAH's educator reports that she is motivated, interested, responsive, courteous and respectful of authority.

CHRISTOPHER is not school age.

Placement – AAMIYAH and CHRISTOPHER are placed with their maternal grandparents in Barksdale Louisiana.

Emotional/Counseling – AAMIYAH was referred for an assessment to address signs of stress and frustration caused by the separation from her mother. Grandparents are able to support the needs and follow recommendations of this assessment.

Medical/Dental – The minors are current on routine medical and dental care.

Safety – The minors are monitored by ICPC worker in Louisiana to ensure their safety and well-being. There are no reports of safety concerns in this placement.

SIBLING CONTACT:

- ☒ Placed Together
☐ Not Placed Together –

REASONABLE EFFORTS TO ACHIEVE THE PERMANENCY PLAN:

On behalf of the parents:

1. Maintain contact with natural mother for case plan compliance.
2. Attempt to contact biological and punitive fathers via mail.
3. Request reports from Service Providers in Louisiana.
4. Maintain contact with care providers to ensure the safety and well-being of the minors.
5. Arrange supervised visits with minors.

On behalf of the child(ren):

7. Obtain reports from ICPC workers in Louisiana.
8. Maintain contact with care providers.
9. Refer to ICPC for foster care license.
10. Arrange supervised visits with natural parents.
11. Maintain contact with natural parents.
12. Refer case to District Attorney for TPR.

1 13. Submit referral for financial assistance for care providers.
2
3

4 **GOALS FOR THE NEXT REVIEW PERIOD:**

5 A. TPR with adoption by maternal grandparents.

6 **SUMMARY AND RECOMMENDATIONS:**

7 Ms. DeBerry complies with the Department of Family Services and maintains regular
8 contact with her assigned case worker. Ms. DeBerry has completed her case plan and
9 has the knowledge and tools to effectively parent her children. Conversely it is difficult for
10 DFS to ascertain the information detailing Ms. DeBerry's actual comprehension of her
11 roll in this act of physical abuse vs. her child just having an injury due to him not being
12 supervised. DFS recommends moving forward at this time with TPR and achieving
13 permanency for these children.

11 **CHILD SUPPORT:**

12 N/A

13
14 **WHEREFORE, DEPARTMENT OF FAMILY SERVICES RESPECTFULLY
RECOMMENDS:**

- 15 (1) That AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM Jr. remain
16 under the jurisdiction of the Family Court and in the legal custody of the
17 Clark County Department of Family Services;
18 (2) That the efforts made by the Department of Family Services are found to be
19 reasonable efforts as outlined in this report;
20 (3)
21 (4) That this matter be brought back for Formal Review in six months.

22 Submitted By:

23 MICHELLE JORDAN
24 CASE MANAGER
25 CLARK COUNTY
26 DEPARTMENT OF FAMILY SERVICES
121 SOUTH MARTIN LUTHER KING BLVD.
LAS VEGAS, NEVADA 89106

on leave.
CHERYL COOKE
SUPERVISOR

27 DATE: 09/13/2011
28 COURT CASE NO.: J-10-319959-P1

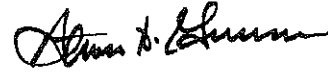
Hay servicios gratis de ayuda con otros idiomas. Para pedir un intérprete, llame por favor al Coordinador
de Servicios de Intérpretes al 671-4578

Free language assistance services are available. To request an interpreter, please call the Language
Assistance Coordinator at 671-4578.

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1 DAVID ROGER
2 DISTRICT ATTORNEY
3 Jennifer Kuhlman
4 Deputy District Attorney
5 Juvenile Division
6 Nevada Bar No. 10113
601 North Pecos
Las Vegas, Nevada 89101
(702) 455-5320

ORIGINAL


CLERK OF THE COURT

7 **EIGHTH JUDICIAL DISTRICT COURT**
8 **FAMILY DIVISION - JUVENILE**
9 **CLARK COUNTY, NEVADA**

10 In the Matter of:

11 AAMIYAH DE NASIA LAMB
12 Date of Birth: 01-04-2004
13 A Minor, 7 Years and 08 Month(s) of
14 Age.

COURT CASE NO.: J-10-319959-P1
DEPT.: FAMILY JUVENILE
COURTROOM: HM FEMIANO - #22

15 CHRISTOPHER BYNUM JR.
16 Date of Birth: 03-28-2009
17 A Minor 2 Years 06 Months of Age.

18 **OUT-OF-HOME PLACEMENT ORDER - Unlicensed Relative**

19 This matter having come on for Permanency and Placement Review before the
20 Family Court, Eighth Judicial District, County of Clark, State of Nevada, Clark County
21 Department of Family Services, on this 22th day of March, 2012, with parent(s) Keandra
22 DeBerry and Christopher Bynum Sr. not being present in Court, and subject minor(s)
23 being available to the Court, and the Court finding that the minor(s) come(s) within the
24 provisions of NRS 432B.410, 432B.550, 432B.580, 432B.590, and 432B.600, and good
25 cause being shown;
26
27
28

1 **THE COURT FINDS** that continuation of the minor(s) in the home of the
2 parent(s)/guardian(s), DEBERRY, KEAUNDRA and Christopher Bynum Sr. , is contrary
3 to the welfare of the child(ren);
4

5 **THE COURT FURTHER FINDS** that reasonable efforts have been made as cited
6 in the Permanency and Planning Review Report to prevent or eliminate the need for
7 removal of the child(ren) from DEBERRY, KEAUNDRA and Christopher Bynum Sr.
8 home;

9 **THE COURT FURTHER FINDS** that reasonable efforts have been made as cited
10 in the Permanency and Planning Review Report to make it possible for the child(ren) to
11 return to the home of DEBERRY, KEAUNDRA ; accordingly,
12

13 **IT IS HEREBY RECOMMENDED** that AAMIYAH DE NASIA LAMB and
14 CHRISTOPHER BYNUM JR. are continued as Wards of the Family Court as children in
15 Need of Protection;

16 **IT IS FURTHER RECOMMENDED** that legal custody remains with the Clark
17 County Department of Family Services for placement until AAMIYAH DE NASIA LAMB
18 and CHRISTOPHER BYNUM JR. reach(es) the statutory age as prescribed by law, or
19 until further Order of the Court. Control and custody is awarded with all necessary
20 authority and power to furnish, provide, and authorize care and services to the subject
21 minor(s) as may seem necessary and proper, and in the child(ren)'s best interest and
22 welfare, including but not limited to: food, clothing, shelter, education, and routine medical
23 care and treatment;
24

25 **IT IS FURTHER RECOMMENDED** that the Clark County Department of Family
26 Services shall have legal authority to access and obtain any records that relate to the
27 child's well being to include but not limited to: medical, dental, educational, mental health,
28 and substance abuse;

1 **IT IS FURTHER RECOMMENDED** that the Permanency Plan goal of Adoption as
2 recommended by the Clark County Department of Family Services is in the child(ren)'s
3 best interest and shall be adopted by the Court;
4

5 **IT IS FURTHER RECOMMENDED** that continuation of reasonable efforts to
6 reunify AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM JR. with DEBERRY,
7 KEAUNDRA , as required by NRS 432B.393 is consistent with the Permanency
8 Plan;
9

10 **IT IS FURTHER RECOMMENDED** that the following efforts that have been made
11 by the Clark County Department of Family Services to meet the permanency goal are
12 reasonable efforts:

- 13 1. Maintain contact with natural mother for case plan compliance.
- 14 2. Attempt to contact biological and punitive fathers via mail.
- 15 3. Request reports from Service Providers in Louisiana.
- 16 4. Maintain contact with care providers to ensure the safety and well-being of the minors.
- 17 5. Arrange supervised visits with minors.
- 18 6. Inquire about the well-being of non-custody minor 1 year-old KEAUNDRE BYNUM.
- 19 7. Obtain reports from ICPC workers in Louisiana.
- 20 8. Maintain contact with care providers.
- 21 9. Refer to ICPC for foster care license.
- 22 10. Arrange supervised visits with natural parents.
- 23 11. Maintain contact with natural parents.
- 24 12. Attend all review hearings as directed by the court
- 25 13. Prepare records should TPR be achieved to begin process of adoption.
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IT IS FURTHER RECOMMENDED that sibling visitation is not applicable;

IT IS FURTHER RECOMMENDED that:

☐ Child Support is waived;

☐ Child support is ordered in the amount of \$_____ for

_____ for
per child;

IT IS FURTHER RECOMMENDED that the AAMIYAH DE NASIA LAMB and
CHRISTOPHER BYNUM JR. is placed in the unlicensed relative home of Clifford and
Benita Taylor.

IT IS FURTHER FOUND AND RECOMMENDED that neither the physical
custodian(s) nor the parent(s) may remove the subject minor(s) from the State of Nevada
without the written consent of the Clark County Department of Family Services or by
Order of the Court;

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3 IT IS FURTHER RECOMMENDED that this matter be reviewed on the 20

4 day of Sept., 2012, at the hour of 2:30 p.m., Department

5 G.

6

7 You are hereby notified that you have a right to a rehearing pursuant to Eighth

8 Judicial District Court Rule 1.46. An application for rehearing must be filed within five days

9 after receipt of the Referee's Findings and Recommendations.

10

11 Dated this 22 day of March, 2012.

12

13 
14 JUVENILE HEARING MASTER
15 MARI D. PARLADE

16 IT IS SO ORDERED.

MAR 27 2012

17 Dated this _____ day of _____, 20____.

18

19 
20 DISTRICT JUDGE - JUVENILE

STEVEN E. JORDAN

21 Submitted by:

Submitted by:

22 DAVID ROGER
23 DISTRICT ATTORNEY

24 Valonda Bennett
25 MICHELLE JORDAN Michelle Jordan
26 CASE MANAGER
27 DEPARTMENT OF FAMILY SERVICES

By: Jennifer J. Kuhlman
Deputy District Attorney

28 COURT CASE NO.: J-10-319959-P1

ORIGINAL

Am. J. Johnson
CLERK OF THE COURT

1 SAO
2 Romeo R. Perez, Esq.
3 Nevada Bar Number: 8223
4 The Law Offices of Romeo R. Perez, P.C.
5 3100 East Charleston Blvd, Suite 112
6 Las Vegas, Nevada 89104
7 Tel: (702) 214-7244
8 Attorney for Keandra Deberry

District Court, Family Division
Clark County, Nevada

9 IN THE MATTER OF THE CHILDREN: }

CASE NO. D-11-446967-R

10 CHRISTOPHER BYNUM, JR.
11 AAMIYAH LAMB

DEPT. C

12 Minors under 18 years of age

STIPULATION AND ORDER

13 IT IS HEREBY STIPULATED by and between Jennifer Kuhlman, Esq. District
14 Attorney's Office Juvenile Division, Clark County, Nevada, (hereafter referred to as "DA") and
15 the Respondent, Keandra Deberry (hereafter referred to as "Keandra"), by and through her
16 attorney, Romeo R. Perez, Esq. that the following shall be adopted as the Order of the Court:

17 IT IS FURTHER STIPULATED AND AGREED that the Trial set for April 6, 2012 at
18 9:00 a.m. is hereby continued due to Attorney Perez being out of the Jurisdiction.
19

20 ///

21 ///

22 ///

23 //

24 //

25 //

26 //

27 //

28

Stipulation and Order- 1

RECEIVED
MAR 29 2012
DEPT. C

1 IT IS FINALLY STIPULATED AND AGREED that the parties agree to a date to set on
2 calendar for a new trial date.

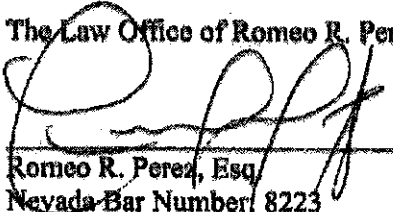
3 IT IS SO STIPULATED.


4 DATED this 26 day of March, 2012.

5 Respectfully submitted by:

6 The Law Office of Romeo R. Perez, P.C.

7 District Attorney Office, Juvenile Division

8 
9 Romeo R. Perez, Esq.
10 Nevada Bar Number: 8223
11 3100 East Charleston Boulevard, Ste. 112
12 Las Vegas, Nevada 89104
13 Tel: (702) 214-7244
14 Attorney for Keaundra Deberry

15 
16 Jennifer Kuhlman, Esq.
17 Nevada Bar Number: 10113
18 Deputy DA-Juvenile Division
19 601 N. Pecos Road
20 Las Vegas, Nevada 89101
21 Tel: (702) 455-6989

1 ORDG

2 Romeo R. Perez, Esq.
3 Nevada Bar Number: 8223
4 The Law Offices of Romeo R. Perez, P.C.
5 3100 East Charleston Blvd, Suite 112
6 Las Vegas, Nevada 89104
7 Tel: (702) 214-7244
8 Attorney for Keaundra Deberry

District Court, Family Division
Clark County, Nevada

9 IN THE MATTER OF THE CHILDREN:)

10 CHRISTOPHER BYNUM, JR.
11 AAMIYAH LAMB

CASE NO. D-11-446967-R

DEPT. C

12 Minors under 18 years of age

13 ORDER GRANTING STIPULATION AND ORDER

14 This Court, having reviewed the Stipulation and Order and all other pleadings, papers and
15 documents on file herein, and good cause appearing therefore:

16 IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the Trial set for April 6,
17 2012 at 9:00 p.m. is hereby continued;

18 IT IS FINALLY ORDERED, ADJUDGED AND DECREED that the parties appear to
19 set a trial date on the 10th day of April, 2012 at 10^{am}

20 IT IS SO ORDERED.

21 DATED this 29 day of MAR 29 2012, 2012.

22 By: 

Honorable Judge Presiding

STEVEN E. JONES

23 Respectfully submitted,
24 The Law Offices of Romeo R. Perez, P.C.

25 By: 
26 Romeo R. Perez, Esq.
27 Nevada Bar Number: 8223

28 Stipulation and Order- 3


JUL 7 2012

CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE

1 CLARK COUNTY
2 DEPARTMENT OF FAMILY SERVICES
3 121 SOUTH MARTIN LUTHER KING BLVD.
4 LAS VEGAS, NEVADA 89106
5 (702) 455-7200

FILED
APR 11 2012
Clerk of Court
CLERK OF COURT

6 **EIGHTH JUDICIAL DISTRICT COURT**
7 **FAMILY DIVISION - JUVENILE**
8 **CLARK COUNTY, NEVADA**

9 In the Matter of:

10 CHRISTOPHER LAMONT BYNUM

11 Date of Birth: 03-28-2009

12 A Minor 3 years, 00 Months of Age

13 AAMIYAH DE NASIA LAMB

14 Date of birth: 1/04/2001

15 A Minor 8 years of age and 3 months

COURT CASE NO.: J-10-319959-P1

DEPT.: FAMILY JUVENILE

16 **REPORT FOR PERMANENCY AND PLACEMENT REVIEW**

17 Date of Hearing: 04-10-2012

18 Time of Hearing: 02:00 PM

19 Courtroom: HM FEMIANO - #22

20 Attachment:

21 **CONCERNING:**

22 Father: CHRISTOPHER BYNUM SR

23 DOB: 01-06-1975

24 Address: S. Carolina. Mr. Bynum is the father as to both minor children, JOSEPH

25 LAMB IS PUNITIVE AS TO AAMIYAH LAMB, DOB 7/3/86 Last known

26 address Goldsboro NC

27 VIRGIL GRAVES

28 Mother: KEAUNDRA DEBERRY 11/20/86

DOB: 12-15-1983

Address: S. Carolina

Siblings: Keaundre is not in custody at this time.

☒ The Indian Child Welfare Act does not apply.

☐ The Indian Child Welfare Act does apply.

NOTIFICATION OF HEARING AND TYPE OF SERVICE

1 Mother: Telephone call
2 Father(s): As to CHRISTOPHER BYNUM JR Unable to locate until
3 info received by family that he is residing in S.Carolina
4 with natural mother otherwise no contact from him
5 directly. No contact with putative father in the last 6
6 months.

7 Current Placement: Phone 4/10/2012

8 CASA: N/A

9 Child's Attorney: N/A

10 Mother's Attorney: At previous court hearing Romeo Perez ESQ

11 Father's Attorney: N/A

12 Tribe: N/A

13 ICPC Placement of both minor children notified by phone on 4/10/12

14 **REMOVAL DATE:**

15 5/21/2010

16 **TRIAL HOME VISIT DATES:**

17 N/A to ; to

18 **REASON FOR CUSTODY AND COURT JURISDICTION (formally known as
19 Ward ship):**

20 Petition #1 dated 05-17-2010 states the following;

21 The subject minors' mother is KEAUNDRA DEBERRY. The identity of
22 AAMIYAH'S father is unknown to DFS. CHRISTOPHER BYNUM, SR. is the
23 father of CHRISTOPHER, JR. MR. BYNUM was a person found regularly in
24 the home at the time the alleged abuse/neglect occurred for purposes of NRS
25 432B.130.

26 (b) MS. DEBERRY physically abused and/or improperly supervised
27 CHRISTOPHER, JR. resulting in CHRISTOPHER, JR. sustaining a triangle
28 shaped burn to his left cheek consistent with the shape of an iron.

(c) MR. BYNUM physically abused and/or improperly supervised
CHRISTOPHER, JR. resulting in CHRISTOPHER, JR. sustaining a triangle
shaped burn to his left cheek consistent with the shape of an iron.

(d) MS. DEBERRY neglected CHRISTOPHER, JR'S medical needs by failing
to seek medical treatment for the burn sustained to his face.

(e) MS. DEBERRY'S drug use adversely affects her ability to provide for the
care of the children.

(f)MR. BYNUM neglected CHRISTOPHER, JR'S medical needs by failing to
seek medical treatment for the burn sustained to his face.

(g) MR. BYNUM and MS. DEBERRY engage in acts of domestic violence
against each other. Their propensity to engage in acts of domestic violence
adversely affects their ability to provide for the care of the children.

(h) MS. DEBERRY and MR. BYNUM refused to allow the Department of Family
Services access to CHRISTOPHER, JR. in order to access his safety.

1 Additionally, while knowing there was an open investigation, MS. DEBERRY
2 and MR. BYNUM left Clark County, Nevada and fled to Louisiana.

3 (i) MR. BYNUM is a registered felon for Felony in Possession of a Firearm;
4 Assault with a Deadly Weapon; Possession of a Controlled Substance;
5 Possession of Marijuana.

6 (j) MR. BYNUM'S drug use adversely affects his ability to provide for the care
7 of the children.

8 **PREVIOUS COURT ORDER DEEMED EFFORTS BY THE DEPARTMENT**
9 **TO ACHIEVE THE PERMANENCY PLAN:**

10 ☒ Were Reasonable Efforts

For: AAMIYAH DE NASIA LAMB
and CHRISTOPHER BYNUM JR.

11 ☐ Were Not Reasonable Efforts

For:

12 **PERMANENCY GOAL AND PROJECTED DATE OF ACHIEVEMENT:**

13 ☐ Reunification

With:

14 ☒ Termination of Parental Rights and Adoption

By: Maternal Grandparents

15 ☐ Guardianship

By:

16 ☐ Long Term Relative Placement

With:

17 ☐ Other Planned Permanent Living

With:

Arrangement

Projected Date of Achievement:

18 **CONCURRENT PERMANENCY GOAL:**

19 ☐ Reunification

With:

20 ☐ Termination of Parental Rights and Adoption

By:

21 ☐ Guardianship

By:

22 ☐ Long Term Relative Placement

With:

23 ☐ Other Planned Permanent Living

With:

Arrangement

24 **RATIONALE FOR PERMANENCY PLAN:**

25 On 04-27-2010 the CPS hotline received a report regarding CHRISTOPHER
26 BYNUM Jr. regarding a burn that the minor sustained from a clothing iron to his
27 cheek. The natural parents refused CPS access to CHRISTOPHER BYNUM
28 Jr. and later absconded to Louisiana with minors AAIMAYAH LAMB and
CHRISTOPHER BYNUM Jr. The natural parents did not seek immediate
medical care for CHRISTOPHER.

Ms. DeBerry participated in physical abuse counseling with Andrea N. Pharr,
through Contemporary Quality Care, LLC in the State of Louisiana. Ms. Pharr
reports that Ms. DeBerry displays an understanding of the concepts of physical
abuse with greater insight into the affects of physical and mental abuse. On

1 May 11, 2010 Dr. Thomas A. Neumann in Tallulah, Louisiana examined
2 CHRISTOPHER BYNUM Jr. and reports that the injury is well healed with no
3 evidence of any further abuse.. Ms. Deberry acknowledge her negligence and
4 admits that she improperly supervised her son CHRISTOPHER BYNUM Jr.,
5 thereby leaving him vulnerable and at risk for harm and danger; causing him to
6 sustain the injury to his face. Father has not cooperated thus far with the
7 department and it is unknown at this time whether there is any understanding or
8 further explanation from the father about the injury to his sons face. There is
9 also no communication as to whether or not he is enrolled in any type of
10 counseling. No contact to date from putative either.

11 Furthermore it was recently brought to the attention of the department that Ms.
12 Deberry had permanently relocated to S. Carolina as her father had recently
13 passed and left her some property. During the month of March, this supervisor
14 spoke to Ms. Deberry on 2 separate occasions. During these conversations
15 Ms. Deberry never disclosed that Mr. Christopher Bynum father of the children
16 is also living in S. Carolina in her home. On the contrary, Ms. Deberry stated
17 that she was not in contact with him at all.

18 **PARENTS' PROGRESS:**

19 **Visitation:** Natural mother calls her children 3-4 times per day since her
20 relocation to S Carolina. Mr. Bynum does not contribute to these
21 conversations.

22 **Housing:** Ms. Deberry and Mr. Bynum live in South Carolina in a home left to
23 Ms. Deberry by her natural father. Neither father has been in touch with the
24 dept. Outside knowledge provided to this department stated that Mr. Bynum is
25 living in S. Carolina with Ms. Deberry against the wishes of the extended family.

26 **Employment:** Ms. Deberry is no longer employed by Sonic. Mr. Deberry is not
27 employed.

28 **Counseling:** No further reports of counseling continuing for Ms. DeBerry since
the last court hearing. No information of any counseling for Mr. Bynum or
punitive father.

Parenting: Parenting class has been completed by Ms. DeBerry while in
Louisiana. To date: no proof for Biological or punitive father as to parenting
class participation.

Other: Extended family reported to the department that they feel Keandra
loves her children very much, however she continues to cohabituate with Mr.
Bynum and negate her responsibilities as a parent, putting his needs before her
family.

1
2 **CHILD(REN)'S CURRENT PLACEMENT:**

3 List child(ren) anAAMIYAH and CHRISTOPHER are placed with their maternal
4 grandparents in Barksdale Louisiana placement(s).

5 This placement is not within close proximity to the parent(s) for
6 CHRISTOPHER LAMONT BYNUM and AAMIYAH DE NASIA LAMB. The
7 placement is not in close proximity because the children are placed in
8 Louisiana via ICPC with their maternal grandparents and natural mother and
9 father relocated to S Carolina. Ms Deberry moved out of the home where her
10 children were placed and is now living with Christopher Bynum who has not
11 completed or acknowledged the importance of case plan compliance in order to
12 re-gain custody of his child. (ren)

13 This placement is The least restrictive for CHRISTOPHER LAMONT BYNUM
14 and AAMIYAH DE NASIA LAMB.

15 **CHILD(REN)'S WELL BEING:**

16 **Education** – AAMIYAH is in the 2nd grade at Waller Elementary School.
17 AAMIYAH is an "A" student in Math, Reading and Spelling. AAMIYAH's
18 educator reports that she is motivated, interested, responsive, courteous and
19 respectful of authority.

20 CHRISTOPHER is not school age.

21 **Placement** – AAMIYAH and CHRISTOPHER are placed with their maternal
22 grandparents in Barksdale Louisiana.

23 **Emotional/Counseling** – AAMIYAH is referred for an assessment to address
24 signs of stress and frustration caused by the separation from her mother.
25 Grandmother reports that AAMIYAH is doing much better and is a bit more
26 eased when speaking with her mother.

27 **Medical/Dental** – The minors are current on routine medical and dental care.

28 **Safety** – No safety concerns at this time

Psychiatric Services –

Is the Pick One listed in report currently on any psychotropic medication?

Pick One List the medications and for who here or DELETE this
information

Has a Court appointed a person to be legally responsible for the Pick One
psychiatric services?

Pick One

*at beg of
case
BU case
started.*

1 When was the Pick One last appointment? Type "Not Applicable" or the
2 necessary information

3 When will the Pick One have an appointment? Type "Not Applicable" or
4 the necessary information

5 **SIBLING CONTACT:**

6 ☐ Placed Together

7 ☒ Not Placed Together – Both CHRISTOPHER and AAMIYAH are placed with
8 together with their natural maternal grandparents. One year old Keaundre is
not in custody and lives with his parents.

9 **REASONABLE EFFORTS TO ACHIEVE THE PERMANENCY PLAN:**

10 The focus is on activities, actions and changes since the last Court report.

11 **On behalf of the parents:**

- 12 1. Maintain contact with natural mother for case plan compliance.
13 2. Attempt to contact biological and punitive fathers via mail.
14 3. Request reports from Service Providers in Louisiana.
15 4. Maintain contact with care providers to ensure the safety and well-being of
the minors.
16 5. Arrange supervised visits with minors.
17 6. Inquire about the well-being of non-custody minor 1 year-old KEAUNDRE
BYNUM.

18 **On behalf of the child(ren):**

- 19 1. Maintain contact with natural mother for case plan compliance.
20 2. Attempt to contact biological and punitive fathers via mail.
21 3. Request reports from Service Providers in Louisiana.
22 4. Maintain contact with care providers to ensure the safety and well-being of
the minors.
23 5. Arrange supervised visits with minors.
24 6. Inquire about the well-being of non-custody minor 1 year-old KEAUNDRE
BYNUM.

25 **GOALS FOR THE NEXT REVIEW PERIOD:**

26 Resolve legal status of both CHRISTOPHER AND AAMIYAH and submit case
27 to adoptions as to both children with their maternal grandparents via ICPC in
Louisiana.

28 **SUMMARY AND RECOMMENDATIONS:**

This supervisor would like to apologize for the former court report submission
that was difficult for the court to understand. The day of this writing, there was

1 an electrical blowout whereas the computers were affected. This supervisor
2 was in the middle of writing this report and thought the new document had
3 saved and it had not. The wrong document was filed at the time because when
4 printed it was assumed to be the new report. This is the explanation for the
misguided information.

5 The following summary is in support of the permanency goal of termination of
6 Parental rights as Ms. Deberry and Mr. Bynam and (punitive) father have yet to
7 fully cooperate with the expectations set forth in their respective case plans.
8 Neither Mr. Bynum nor punitive father have presented any proof of case plan
9 compliance. There has been no contact either person in the last 6 months.
10 The most recent information is that Mr. Bynum has relocated to S. Carolina with
11 Ms. Deberry. It has been reported that they are living in a home left to Ms.
12 Deberry by her biological father who had recently passed away and left her the
13 property.

14 Ms. Deberry reported that she had indeed moved to this home in S Carolina,
15 however when asked about Mr. Bynum she did not provide any information.
16 Ms. Deberry also stated that she originally moved back to Louisiana for a
17 funeral when in actuality she had requested a ticket from her mother stating
18 that she just needed to be home. The department has been instrumental in
19 assisting Ms. Deberry with any help needed to complete her case plan. Ms
20 Deberry completed her parenting program and she also completed an
21 assessment with Contemporary Quality Care in Shreveport LA. This course
22 consisted of 6 core issues with a total meeting of 5 sessions. These were open
23 discussions between Ms. Deberry and the counselor and did not include any
24 recommendations other than an overview of topics sighting definitions of terms
25 associated with abuse and neglect rather than treatment designed for a person
26 who has been victimized and/or has committed the offenses.

27 Based on the series of criminal behaviors concerning Mr. Bynum, the evasive
28 tactics of the parents still continuing to date. The lack of a medically compatible
explanation as to their son Christopher's burn, verified concerns of the same,
past drug use in the home and current concerns from extended family, the risk
of reunification to either parent with token efforts as to the mother Keandra
Deberry at best, the department will continue to support the plan of termination
of parental rights and adoption at this time. TPR trial is scheduled for July 11,
2012.

Both children are placed in an adoptive resource with their maternal
grandparents via ICPC in Louisiana. Maternal grandmother is supportive of her
daughter and states that she does love her children. She does, however state
that the extended family is concerned about Ms. Deberry and her relationship
choices and stated verbatim to this supervisor "I cannot understand why my
daughter is choosing a man over her children."

CHILD SUPPORT:

1 Child support is not in effect by this court. However it is reported that Ms.
2 Deberry although currently unemployed purchased her children 2 outfits and
3 shoes upon receipt of her tax return. No support from Mr. Bynum or punitive
4 has been given to either children during the last 6 months.

5 **WHEREFORE, DEPARTMENT OF FAMILY SERVICES RESPECTFULLY**
6 **RECOMMENDS:**

- 7 (1) That CHRISTOPHER LAMONT BYNUM remain under the
8 jurisdiction of the Family Court and in the legal custody of the Clark
9 County Department of Family Services;
10 (2) That the efforts made by the Department of Family Services are
11 found to be reasonable efforts as outlined in this report;
12 (3) That the child support addendum(a) filed with this Court remain in
13 effect; (If no child support is being ordered, take this line out.)
14 (4) That this matter be brought back for Formal Review in six months.

15 Submitted By:

16 MICHELLE JORDAN
17 CASE MANAGER
18 CLARK COUNTY
19 DEPARTMENT OF FAMILY SERVICES

20 
21 MICHELLE DOUGLAS
22 SUPERVISOR

23 DATE:
24 COURT CASE NO.: J-10-319959-P1
25
26
27
28

ORIGINAL



CLERK OF THE COURT

1 MTN

2 Romeo R. Perez, Esq.

3 Nevada Bar Number: 8223

4 The Law Offices of Romeo R. Perez, P.C.

5 1621 East Flamingo, Suite 15A

6 Las Vegas, Nevada 89119

7 Tel: (702) 214-7244

8 Attorney for Keaundra Deberry

District Court, Family Division

Clark County, Nevada

9 IN THE MATTER OF THE CHILDREN: }

CASE NO. D-11-446967-R

10 CHRISTOPHER BYNUM, JR.

DEPT. C

11 AAMIYAH LAMB }

12 Minors under 18 years of age }

13 **MOTION TO WITHDRAW AS COUNSEL OF RECORD**

14 The Law Offices of Romeo R. Perez, P.C. respectfully moves this Honorable Court for an
15 Order allowing withdrawal as counsel for KEAUNDR A DEBERRY, in the above-entitled
16 action. This Motion is made and based upon SCR 48, SCR 166, EDCR 7.40, the pleadings and
17 papers on file herein and the Points and Authorities and the Declaration of Romeo R. Perez, Esq.
18 attached hereto.

19 DATED this 11 day of June 2012.

20 Respectfully submitted,

21 The Law Offices of Romeo R. Perez, P.C.

22 By 
23 Romeo R. Perez, Esq.

24 Nevada Bar No. 8223

25 1621 East Flamingo, Suite 15A

26 Las Vegas, Nevada 89119

27 Tel: (702) 214-7244

28 Attorney for Keaundra Deberry

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NOTICE OF MOTION

PLEASE TAKE NOTICE that on the 10th day of July 2012,
ROMEO R. PEREZ, ESQ. will bring the foregoing motion on for hearing in Department C of the
above-entitled court at 9:00 a.m. or as soon thereafter as counsel may be heard.

DATED this 11 day of June 2012.

Respectfully submitted,

The Law Offices of Romeo R. Perez, P.C.

By: 

Romeo R. Perez, Esq.,

Nevada Bar No. 8223

1621 East Flamingo, Suite 15A

Las Vegas, Nevada 89119

Tel: (702) 214-7244

Attorney for Keandra Deberry

POINTS AND AUTHORITIES

Supreme Court Rule 166, in combination with SCR 48 and EDCR 7.40, govern the
standard for withdrawals of attorneys from representation of a client in a legal matter. It states, in
pertinent part:

2. Except as stated in subsection 3, a lawyer may withdraw from representing a client if
withdrawal can be accomplished without material adverse effect on the interests of the client, or
if:

- (b) The client persists in a course of action involving the lawyer's services that the
lawyer reasonably believes is criminal or fraudulent;
- (c) The client has used the lawyer's services to perpetrate a crime or fraud;
- (d) A client insists upon pursuing an objective that the lawyer considers repugnant or
imprudent;
- (e) The client fails substantially to fulfill an obligation to the lawyer regarding the
lawyer's services and has been given reasonable warning that the lawyer will
withdraw unless the obligation is fulfilled;
- (f) The representation will result in an unreasonable financial burden on the lawyer
or has been rendered unreasonable difficult by the client; or
- (g) Other good cause for withdrawal exists.
- (h) Except as stated in paragraph (c), a lawyer may withdraw from representing a
client if withdrawal can be accomplished without material adverse effect on the
interests of the client, or if:
 - (5) the representation will result in an unreasonable financial burden on the
lawyer or has been rendered unreasonable difficult by the client; or
 - (6) other good cause for withdrawal exists.

1
2 Accordingly, The Law Offices of Romeo R. Perez, P.C. requests to withdraw as counsel
3 of record for Keaundra Deberry:

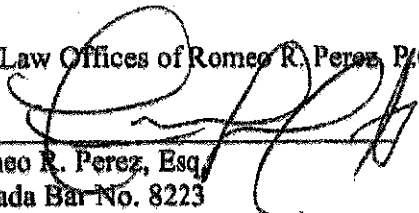
- 4 1. The Law Offices of Romeo R. Perez, P.C. was appointed to represent Keaundra
5 Deberry in an Abuse & Neglect matter and subsequent Termination of Parental
6 Rights.
7 2. Since filing an appearance on behalf of Keaundra Deberry, she has not complied
8 with her client obligations.
9 3. Further, Keaundra refuses to properly communicate with this office, thereby
10 creating a conflict, in which the representation has become unreasonably difficult
11 to effectively continue the Attorney/Client relationship.
12 4. This Court has set a trial date of July 11th, 2012 at 9:00am in Department C.

13 Therefore, the law firm of ROMEO R. PEREZ, ESQ requests this Court to enter its Order
14 to enter its Order granting ROMEO R. PEREZ, ESQ. its request to withdraw as counsel of
15 record for KEAUNDRA DEBERRY.

16 DATED this 11 day of June 2012.

17 Respectfully submitted,

18 The Law Offices of Romeo R. Perez, P.C.

19 By: 
20 Romeo R. Perez, Esq.
21 Nevada Bar No. 8223
22 1621 East Flamingo, Suite 15A
23 Las Vegas, Nevada 89119
24 Tel: (702) 214-7244
25 Attorney for Keaundra Deberry
26
27
28

1 CERTIFICATE OF MAILING

2 I hereby certify that on the 11/14 day of June 2012 I served the foregoing MOTION
3 TO WITHDRAW, by placing a true and correct copy thereof in the United States mail Postage
4 prepaid and addressed to the persons listed below:

5 Last Known Address:

6 KEAUNDRA DEBERRY
7 502 Henry Street
8 Latta, SC 29565
9 Respondent

10 DDA Jennifer Kuhlman
11 601 N. Pecos Rd.
12 Las Vegas, NV 89101

13 Michelle Jordan, M.Ed.
14 Family Services Specialists
15 121 S. Martin Luther King Blvd
16 Las Vegas, NV 89106

17 
18 an employee of Romeo R. Perez, Esq.
19
20
21
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28

AFFIDAVIT OF COUNSEL IN SUPPORT OF MOTION TO WITHDRAW

STATE OF NEVADA)
) ss
COUNTY OF CLARK)

ROMEO R. PEREZ, the Affiant herein, being first duly sworn, deposes and says:

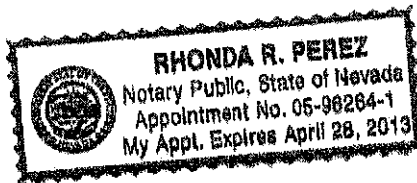
1. I am an attorney duly licensed to practice law in the State of Nevada.
2. I am the attorney of record for the Respondent KEAUNDRA DEBERRY in this matter. The law firm of ROMEO R PEREZ, ESQ was appointed to represent KEAUNDRA DEBERRY in a Termination of Parental Rights matter.
3. Since last hearing an appearance on behalf of KEAUNDRA DEBERRY the law firm of ROMEO R. PEREZ, ESQ, has not been able to effectively communicate with KEAUNDRA DEBERRY. KEAUNDRA DEBERRY has a different view on how her case should be handled therefore it is unreasonably difficult to effectively continue her case.
4. This Motion is in no way brought for the purpose of delaying this action.


ROMEO R. PEREZ, ESQ.

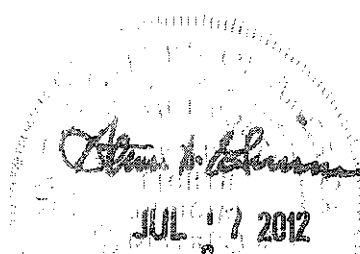
SUBSCRIBED AND SWORN to before me by Romeo R. Perez, Esq. this 14th day

of June 2012.


NOTARY PUBLIC in and for said
County and State



My Commission Expires:



MOTION TO WITHDRAW AS COUNSEL - 5 CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE

ORIGINAL

1 OST

2 Romeo R. Perez, Esq.

3 Nevada Bar Number: 8223

4 The Law Offices of Romeo R. Perez, P.C.

5 1621 East Flamingo, Suite 15A

6 Las Vegas, Nevada 89119

7 Tel: (702) 214-7244

8 Attorney for Keaundra Deberry

District Court, Family Division
Clark County, Nevada



CLERK OF THE COURT

9 IN THE MATTER OF THE CHILDREN:)

CASE NO. D-11-446967-R

10 CHRISTOPHER BYNUM, JR.)

11 AAMIYAH LAMB)

DEPT. C

12 Minors under 18 years of age)

13 **REQUEST FOR ORDER SHORTENING TIME**

14 Comes now, Romeo R. Perez, Esq. for the Respondent, Keaundra Deberry,
15 (hereafter referred to as "Keaundra") and hereby requests this Court expedite the
16 hearing for Counsel's MOTION TO WITHDRAW AS COUNSEL OF RECORD. A
17 Hearing for the motion mentioned above is currently set on July 10, 2012 at 10:00 AM.

18 As set forth in the attached Affidavit, this request has been necessitated by the
19 pending Termination of Parental Rights in addition to the conflicting position that
20 Counsel finds himself in, should he be forced to continue representation. Please see
21 attached Counsel's Motion as Exhibit "A".
22

23 Currently a Trial is scheduled for July 11, 2012 which is only a day after Attorney
24 Perez's Motion. Keaundra will need sufficient time to secure other representation in
25 order to properly prepare the case.
26

27 //

1 This motion is based on the complete file in this case and the attached affidavit of
2 Romeo R. Perez, Esq. and on other such evidence and arguments as the Court may
3 consider.
4

5 DATED this 18 day of June 2012.

6 The Law Office of Romeo R. Perez, P.C.

7
8 By: 

9 Romeo R. Perez, ESQ.
10 Nevada Bar No. 8223
11 1621 East Flamingo, Suite 15A
12 Las Vegas, Nevada 89119
13 Tel: (702) 214-7244
14 Attorney for Defendant
15
16
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AFFIDAVIT OF ROMEO R. PEREZ, ESQ. IN SUPPORT OF
REQUEST FOR ORDER SHORTENING TIME

COUNTY OF CLARK)

) ss:

STATE OF NEVADA)

Romeo R. Perez, Esq., being first duly sworn according to law, deposes and says:

1. That at all times herein affiant was and is a citizen of the United States, over eighteen years of age, and testifies herein based on personal knowledge, except as were based on information and belief.
2. That I am the attorney of record for the Respondent, Keaundra Deberry in this matter;
3. That I am unaware of any prejudice that would result to either party from the hearing of my Motion on an expedited basis since a Termination of Parental Rights trial is currently scheduled for July 11, 2012 at 9:30 am;
4. That the Court date on my Motion to Withdraw is only one day before the scheduled TPR trial;
5. That conflict has been created, in which the representation has become unreasonably difficult to effectively continue the Attorney/Client relationship;
6. This motion is not being made for any improper purpose.

Further, Affiant Sayeth Naught.

DATED this 18 day of June 2012.


Romeo R. Perez, Esq.

SUBSCRIBED AND SWORN to before me by Romeo R. Perez, Esq. on this 18 day of June, 2012.


NOTARY PUBLIC, Clark County, Nevada



1 ORD

2 Romeo R. Perez, Esq.

3 Nevada Bar Number: 8223

4 The Law Offices of Romeo R. Perez, P.C.

5 1621 East Flamingo, Suite 15A

6 Las Vegas, Nevada 89119

7 Tel: (702) 214-7244

8 Attorney for Keaundra Deberry

District Court, Family Division

Clark County, Nevada

9 IN THE MATTER OF THE CHILDREN:)

CASE NO. D-11-446967-R

10 CHRISTOPHER BYNUM, JR.)

11 AAMIYAH LAMB)

DEPT. C

12 Minors under 18 years of age)

13 ORDER SHORTENING TIME

14 TO: All Parties;

15 TO: Their Attorneys;

16 YOU AND EACH OF YOU will please take notice, that the Court will hear the

17 Counsel's Motion on an Order Shortening Time on the ____ day of _____

18 2012 in Department C, of the above-entitled Court, at the hour of _____.m. Any

19 Opposition to the Motion is due on or before _____.m. of the ____ day of

20 _____, 20____.

21 DATED this ____ day of _____, 2012.

22 HONORABLE PRESIDING JUDGE

23 Respectfully submitted by:

24 The Law Office of Romeo R. Perez, P.C.

25 By: _____

26 Romeo R. Perez, Esq.

27 Nevada Bar Number: 8223

28 1621 East Flamingo, Suite 15A

Las Vegas, Nevada 89119

Tel: (702) 214-7244

Request For Order Shortening Time - 4

Alfonso J. Hernandez

JUL 7 2012

CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE

Alfonso L. Salazar
CLERK OF THE COURT

1 ORD

2 Romeo R. Perez, Esq.

3 Nevada Bar Number: 8223

4 The Law Offices of Romeo R. Perez, P.C.

5 1621 East Flamingo, Suite 15A

6 Las Vegas, Nevada 89119

7 Tel: (702) 214-7244

8 Attorney for Kesundra Deberry

District Court, Family Division
Clark County, Nevada

9 IN THE MATTER OF THE CHILDREN:)

CASE NO. D-11-446987-R

10 CHRISTOPHER BYNUM, JR.)

DEPT. C

11 AAMIYAH LAMB)

12 Minors under 18 years of age)

ORDER SHORTENING TIME

13 TO: All Parties;

14 TO: Their Attorneys:

15 YOU AND EACH OF YOU will please take notice that the Court will hear the
16 Counsel's Motion on an Order Shortening Time on the 3rd day of July
17 2012 in Department C, of the above-entitled Court, at the hour of 10:30 A.m. Any
18 Opposition to the Motion is due on or before ____ m. of the ____ day of

19 _____, 20____.

JUN 28 2012

20 DATED this ____ day of _____, 2012.

21
22 *[Signature]*
HONORABLE PRESIDING JUDGE

23 Respectfully submitted by:

24 The Law Office of Romeo R. Perez, P.C.

STEVEN E. JONES

25 By: *[Signature]*

26 Romeo R. Perez, Esq.

27 Nevada Bar Number: 8223

28 1621 East Flamingo, Suite 15A

Las Vegas, Nevada 89119

Tel: (702) 214-7244

JUL 7 2012

Request For Order Shortening Time
CERTIFIED COPY
DOCUMENT ATTACHED IS A
TRUE AND CORRECT COPY
OF THE DOCUMENT ON FILE

DEPT. C

-FILED IN OPEN COURT-

July 11, 2012

Steven D. Grierson, CEO/Clerk of the Court

By:

Rosa Ardesch
Rosa Ardesch, Deputy Clerk

DISTRICT COURT
JUVENILE DIVISION
CLARK COUNTY, NEVADA

In the Matter of:

State of Nevada
Deberry, Keaudra Louise
Virgil, Graves
Lamb, Joseph
Bynum, Christopher Lamont

Case No: D-11-446967-R

Dept. D

Courtroom 11

Robert W. Teuton

ORDER APPOINTING COUNSEL

IT IS HEREBY ORDERED THAT: is referred to the attorney selected below for representation for the duration of the matter.

The above named person must contact the attorney immediately for an appointment.

The next court date is: August 15, 2012 at 9:00 am *Trial*

The ☐ CPS ☐ Case Worker is:

☒ Office of the Special Public Defender - (702) 455-6266.

☐ Denise Pifer, Esq.

Back-up ONLY ☐ Christopher Tilman, Esq.

All District Court fees and costs associated herewith are waived.

*Confirmation of
Counsel 7-13-12
@ 1:30 pm.
Defendant's appearance
monitored.*

Robert W. Teuton
District Judge
Robert W. Teuton

This appointment does not include appointment for any Appeal to the NV Supreme Court

1 CLARK COUNTY
2 DEPARTMENT OF FAMILY SERVICES
3 121 SOUTH MARTIN LUTHER KING BLVD.
4 LAS VEGAS, NEVADA 89106
5 (702) 455-7200

FILED

SEP 26 10 03 AM '12

COPY

6 **EIGHTH JUDICIAL DISTRICT COURT**
7 **FAMILY DIVISION - JUVENILE**
8 **CLARK COUNTY, NEVADA**
9 CLERK OF THE COURT

10 In the Matter of:

11 AAMIYAH DE NASIA LAMB
12 Date of Birth: 01-04-2004
13 A Minor 8 years, 09 Months of Age
14 CHRISTOPHER LAMONT BYNUM
15 Date of Birth: 03-28-2009
16 A Minor 3 years, 06 Months of Age

COURT CASE NO.: J-10-319959-P1
DEPT.: FAMILY JUVENILE

17 **REPORT FOR PERMANENCY AND PLACEMENT REVIEW**

18 Date of Hearing: 09-27-2012

19 Time of Hearing: 11:00 AM

20 Courtroom: HM FEMIANO - #22

21 Attachment:

22 **CONCERNING:**

23 Father: CHRISTOPHER BYNUM SR
24 DOB: 01-06-1975
25 Address: 2985 Old Plain Dealing Road, Plain Dealing, Louisiana 71064 inmate
26 #66218. Mr. Bynum is the father as to minor CHRISTOPHER BYNUM JR.
27 and KEAUNDRE BYNUM.
28 JOSEPH LAMB (putative father as to AAMIYAH LAMB) DOB 7/3/86.
Last known address: 500 Whitfield Drive, Goldsboro, NC 27530

Mother: KEAUNDRA DEBERRY
DOB: 11-20-1986
Address: 502 Henry Street, Latta, South Carolina, 29565.

Siblings: KEAUNDRE BYNUM DOB 12/29/2010 resides with Ms. Deberry.

//
//

DEBERRY-J-10-319959-P1

☒ The Indian Child Welfare Act does not apply.

☐ The Indian Child Welfare Act does apply.

NOTIFICATION OF HEARING AND TYPE OF SERVICE

Mother: U.S. mail to last known address.
Father(s): U.S. mail to last known address.
Current Placement: Via telephone.
CASA: N/A
Child's Attorney: N/A
Mother's Attorney: At previous court hearing.
Father's Attorney: N/A
Tribe: N/A

REMOVAL DATE:

5/21/2010

TRIAL HOME VISIT DATES:

N/A to ; to

REASON FOR CUSTODY AND COURT JURISDICTION (formally known as Wardship):

Petition #1 dated 05-17-2010 states the following;

The subject minors' mother is KEAUNDRA DEBERRY. The identity of AAMIYAH'S father is unknown to DFS. CHRISTOPHER BYNUM, SR. is the father of CHRISTOPHER, JR. MR. BYNUM was a person found regularly in the home at the time the alleged abuse/neglect occurred for purposes of NRS 432B.130.

(b) MS. DEBERRY physically abused and/or improperly supervised CHRISTOPHER, JR. resulting in CHRISTOPHER, JR. sustaining a triangle shaped burn to his left cheek consistent with the shape of an iron.

(c) MR. BYNUM physically abused and/or improperly supervised CHRISTOPHER, JR. resulting in CHRISTOPHER, JR. sustaining a triangle shaped burn to his left cheek consistent with the shape of an iron.

(d) MS. DEBERRY neglected CHRISTOPHER, JR'S medical needs by failing to seek medical treatment for the burn sustained to his face.

(e) MS. DEBERRY'S drug use adversely affects her ability to provide for the care of the children.

(f) MR. BYNUM neglected CHRISTOPHER, JR'S medical needs by failing to seek medical treatment for the burn sustained to his face.

(g) MR. BYNUM and MS. DEBERRY engage in acts of domestic violence against each other. Their propensity to engage in acts of domestic violence adversely affects their ability to provide for the care of the children.

1 DEBERRY-J-10-319959-P1

2 (h) MS. DEBERRY and MR. BYNUM refused to allow the Department of
3 Family Services access to CHRISTOPHER, JR. in order to access his safety.
4 Additionally, while knowing there was an open investigation, MS. DEBERRY
5 and MR. BYNUM left Clark County, Nevada and fled to Louisiana.

6 (i) MR. BYNUM is a registered felon for: Felon in Possession of a Firearm;
7 Assault with a Deadly Weapon; Possession of a Controlled Substance;
8 Possession of Marijuana.

9 (j) MR. BYNUM'S drug use adversely affects his ability to provide for the care
10 of the children.

11 **PREVIOUS COURT ORDER DEEMED EFFORTS BY THE DEPARTMENT**
12 **TO ACHIEVE THE PERMANENCY PLAN:**

13 ☒ Were Reasonable Efforts

For: AAMIYAH LAMB and
CHRISTOPHER BYNUM JR.

14 ☐ Were Not Reasonable Efforts

For:

15 **PERMANENCY GOAL AND PROJECTED DATE OF ACHIEVEMENT:**

16 ☐ Reunification

With:

17 ☒ Termination of Parental Rights and Adoption

By: Adoption by relative.

18 ☐ Guardianship

By:

19 ☐ Long Term Relative Placement

With:

20 ☐ Other Planned Permanent Living

With:

21 Arrangement

22 Projected Date of Achievement:

03/27/12

23 **CONCURRENT PERMANENCY GOAL:**

24 ☒ Reunification

With: Natural mother.

25 ☐ Termination of Parental Rights and Adoption

By:

26 ☐ Guardianship

By:

27 ☐ Long Term Relative Placement

With:

28 ☐ Other Planned Permanent Living

With:

Arrangement

29 **RATIONALE FOR PERMANENCY PLAN:**

30 Ms. DeBerry cooperates with the Department of Family Services by maintaining
31 contact with the agency and working her case plan. Ms. DeBerry has
32 participated in physical abuse therapy in two separate states; she has
33 completed parenting coursework, maintains employment and stable housing.
34 In addition, Ms. DeBerry has regular phone contact with her children and
35 provides support for extra curricular activities and clothing. Although Ms.
36 DeBerry has completed the objectives outlined in her case plan, she has not
37 fully articulated to this agency that she accepts the responsibility for the injury
38 caused to her son CHRISTOPHER. Ms. DeBerry is expected to articulate to the

1 Department of Family Services how she plans to prevent future incidents which
2 jeopardize the safety of her children from occurring. The Department of Family
3 Services must be assured that Ms. Deberry has the protective capacity to keep
4 her children safe from unexplained injuries and to accept the responsibility for
5 the injury caused to her son CHRISTOPER. Without an assurance of
6 protection and accountability from Ms. DeBerry the Department cannot
7 consider reunification and therefore recommends termination of paternal rights
8 and adoption by the maternal grandparents.

9
10 **PARENTS' PROGRESS:**

11 **Visitation:** The family has regular telephone contact as natural mother resides
12 in South Carolina and the minors reside in Louisiana with maternal
13 grandparents.

14 Maternal grandmother states Christopher is not as interested in telephone
15 communication as he is only 3 years old. However, Aamiyah enjoys talking with
16 her mother and consistently ask to go home.

17 The natural mother and children have face to face contact when the family
18 travels to South Carolina for family reunions.

19 **Housing:** Ms. Deberry resides in the family home at 502 Henry Street, Latta,
20 South Carolina, 29565, and lives within 5 miles of supportive extended family
21 members.

22 Mr. Bynum is an inmate in Boisser County jail, 2985 Old Plain Dealing Road,
23 Plain Dealing, Louisiana 71064.

24 According to staff members at the county jail Mr. Bynum has open charges with
25 no release or court date at this time. Mr. Bynum also has a police hold and will
26 be transferred to the city jail upon release to answer charges for the city
27 detention center in Louisiana.

28 Mr. Lambs whereabouts are unknown at this time. A diligent search is
conducted for Mr. Lamb.

Employment: Ms. Deberry is employed at Wendy's in South Carolina. Ms.
Deberry states that she is in the management training program at Wendy's.

Mr. Bynum has not provided proof of employment.

Mr. Lamb's employment status is unknown at this time.

Counseling: Ms. Deberry has participated in physical abuse counseling in
Louisiana and South Carolina.

Mr. Bynum has not provided proof of counseling.

//

DEBERRY-J-10-319959-P1

Parenting: Ms. Deberry has completed parenting coursework.
Mr. Bynum has not provided proof of parenting.

Other: //

CHILD(REN)'S CURRENT PLACEMENT:

AAMIYAH LAMB and CHRISTOPHER BYNUM are placed with their maternal grandparents in Barksdale, Louisiana.

This placement is not within close proximity to the parent(s) for AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM Ms. Deberry resides in South Carolina and the minors reside in Louisiana.

This placement is the least restrictive for AAMIYAH DE NASIA LAMB and CHRISTOPHER BYNUM.

CHILD(REN)'S WELL BEING:

Education – AAMIYAH is in the 3rd grade at Waller Elementary School. AAMIYAH loves school and earns high marks in all subjects. AAMIYAH's educator reports that she is motivated, responsive, courteous and respectful.

CHRISTOPHER is not school age.

Placement – AAMIYAH and CHRISTOPHER are placed with their maternal grandparents in Barksdale, Louisiana.

Emotional/Counseling – No counseling at this time.

Medical/Dental – AAMIYAH and CHRISTOPHER have Asthma with no other major health concerns. The minors are current on medical, dental and vision care.

Safety – Safety concerns for both children are monitored through monthly home visits with the ICPC specialist in Barksdale Louisiana.

Psychiatric Services –

Is the children listed in report currently on any psychotropic medication?

No

//

//

//

//

DEBERRY-J-10-319959-P1

Has a Court appointed a person to be legally responsible for the children's psychiatric services?

No

When was the children's last appointment? Not Applicable.

When will the children have an appointment? Not Applicable.

SIBLING CONTACT:

☒ Placed Together

☒ Not Placed Together – KEAUNDRE BYNUM DOB 12/29/2010 resides with Ms. Deberry.

REASONABLE EFFORTS TO ACHIEVE THE PERMANENCY PLAN:

On behalf of the parents:

Maintain contact with natural mother.

Discussed relinquishment and TPR options with Ms. DeBerry.

DFS supervisor Michelle Douglas referred Ms. DeBerry to a therapist in South Carolina.

Request progress report from therapist Jane Fortune in South Carolina.

Diligent search for Mr. Bynum.

Diligent search for Mr. Lamb.

On behalf of the child(ren):

Maintained contact with ICPC worker and maternal grandparents in Louisiana ;

Discussed with the current foster parent about being a permanent placement for the minors.

Completed social summaries for both minors.

Ordered medical and educational records for the minors;

//

//

1 DEBERRY-J-10-319959-P1

2
3
4 **GOALS FOR THE NEXT REVIEW PERIOD:**

5 Establish permanency for the minors.

6 **SUMMARY AND RECOMMENDATIONS:**

7 The Department of Family Services recommends termination of parental rights
8 and adoption by maternal grandparents if the natural mother is not able to
9 articulate how she plans to protect her children from injury and accept her role
10 in the injury caused to her son.

11 **CHILD SUPPORT:**

12 To be decided by the court.

13 **WHEREFORE, DEPARTMENT OF FAMILY SERVICES RESPECTFULLY**
14 **RECOMMENDS:**

- 15 (1) That AAMIYAH DE NASIA LAMB and CHRISTOPER BYNUM
16 remain under the jurisdiction of the Family Court and in the legal
17 custody of the Clark County Department of Family Services;
18 (2) That the efforts made by the Department of Family Services are
19 found to be reasonable efforts as outlined in this report;
20 (3) That this matter be brought back for Formal Review in six months.

21 Submitted By:

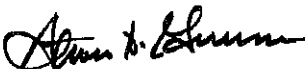
22 *Michelle Jordan*
23 MICHELLE JORDAN
24 CASE MANAGER
25 CLARK COUNTY
26 DEPARTMENT OF FAMILY SERVICES

27 *[Signature]*
28 MICHELLE DOUGLAS
SUPERVISOR

Yolanda Bennett sr.

DATE: 9/25/2012
COURT CASE NO.: J-10-319959-P1

1 **MEMO**
2 DAVID M. SCHIECK
3 SPECIAL PUBLIC DEFENDER
4 Nevada Bar #0824
5 MELINDA SIMPKINS, ESQ.
6 Deputy Special Public Defender
7 Nevada Bar #7911
8 330 South Third Street, Suite #800
9 Las Vegas, Nevada 89155
10 (702) 455-6266
11 (702) 380-6948 fax
12 msimpkins@clarkcountynv.gov
13 Attorney for KEAUNDRA DEBERRY



CLERK OF THE COURT

8 **EIGHTH JUDICIAL DISTRICT COURT, FAMILY DIVISION**
9 **CLARK COUNTY, NEVADA**

10 In the Matter of
11 the Parental Rights as to:

12 AAMIYAH DE'NASIA LAMB,
13 CHRISTOPHER LAMONT BUYNUM, JR)

14 Minors.

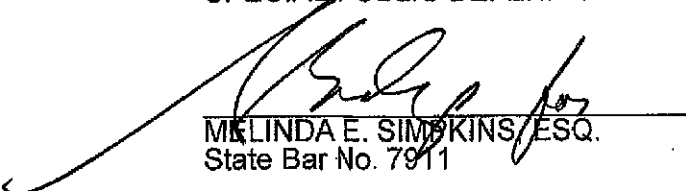
Case No.: D-11-446967-R
Dept. No. D
Courtroom: 11

15 **PRETRIAL MEMORANDUM PURSUANT TO EDCR 7.27**

16 COMES NOW, Respondent, KEAUNDRA DEBERRY, by and through her
17 attorneys, DAVID M. SCHIECK, Special Public Defender, MELINDA E. SIMPKINS,
18 ESQ., Deputy Special Public Defender and DEANNA MOLINAR, ESQ., Deputy
19 Special Public Defender and hereby files this Pretrial Memorandum pursuant to
20 Eighth Judicial District Court Rule 7.27. Service of such Memorandum will be made
21 on the State at the same time as the Court.

22 DATED this 2ND day of November, 2012.

23 DAVID M. SCHIECK
24 SPECIAL PUBLIC DEFENDER

25 
26 MELINDA E. SIMPKINS, ESQ.
27 State Bar No. 7911
28

1

2

7

1 natural mother to

2

3 admit to the crime of child abuse, however, this triggers Fifth Amendment
4 protections.

5 Although this issue has never been addressed by the Nevada Supreme
6 Court, *numerous* other Courts have addressed the issue of compelled
7 admissions in relation to termination of parental rights proceedings.
8 Consistently, these Courts have held that neither the State nor the Court can
9 compel a parent to admit to a crime. Once the threat of termination of parental
10 rights is raised, the threat alone is sufficient to act as compulsion which would
11 trigger Fifth Amendment protections.

12 In *In the Matter of the Welfare of J.W.*, 415 N.W.2d 879 (Minn. 1987), the
13 Minnesota Supreme Court addressed this issue. The Court held that threat of
14 termination of parental rights is sufficient to trigger Fifth Amendment
15 protections. "When a State compels testimony by threatening to inflict potent
16 sanctions unless the constitutional privilege is surrendered, that testimony is
17 obtained in violation of the Fifth Amendment." *citing Lefkowitz v. Cunningham*,
18 431 U.S. 801, 805, 53 L.Ed.2d 1, 97 S.Ct. 2132 (1977). The Court went on to
19 note that "We hold that the trial court's order, to the extent it requires
20 appellants to incriminate themselves, violates appellants' Fifth Amendment
21 rights and is unenforceable." *Id.* at 883.

22 The Minnesota Supreme Court was careful to note, however, that the
23 compelling of such admissions by the State or the Court is as far as the Fifth
24 Amendment protections went, however. "While the state may not compel
25 therapy treatment that would require appellants to incriminate themselves, it
26 may require the parents to otherwise undergo treatment. Therapy, however,
27 which does not include disclosures may be ineffective; and ineffective therapy
28 may hurt the parents' chances of regaining their children. These

1 consequences .lie outside the protective ambit of the Fifth Amendment." *Id.* at
2 883.

3
4 Numerous other Courts have made similar findings. In *In re M.C.P.,*
5 *Juvenile*, 153 Vt. 275, 571 A.2d 627 (Vt. 1989) the Vermont Supreme Court
6 found that the Court cannot require an admission in order to reunify parents
7 and children but parents can have their rights terminated if therapy is
8 ineffective. In *In the Matter of the Welfare of M.D.O.*, 462 N.W.2d 370 (Minn.
9 1990) the Minnesota Supreme Court took it one step further and indicated that
10 if the State advocates there can be no rehabilitation without an admission, they
11 bear the burden of proving that assertion. *Id.* at 378.

12 In *State vs. P.Z.*, 152 N.J. 86, 703 A.2d 901 (N.J. 1997), the Supreme
13 Court of New Jersey found that requiring a parent to choose between the Fifth
14 Amendment protections and another right is inherently coercive. The State
15 cannot compel testimony that requires an admission of criminal wrongdoing
16 and the question is whether therapy can be effective without such admission.
17 In *In the Interest of E.H. III*, 578 N.W.2d 243 (Iowa, 1998), the Supreme Court
18 of Iowa found that where a Court only required treatment, not an admission,
19 this did not violate a parent's Fifth Amendment rights. In *In the Interest of C.H.*,
20 652 N.W.2d 144 (Iowa 2002), the Iowa Supreme Court found that a court
21 cannot compel a parent to admit guilt in order to be reunified. The court could
22 require treatment but not an admission of guilt as part of that treatment.

23 In *Minh T. V. Arizona Department of Economic Security*, 202 Ariz. 76, 41
24 P.3d 614 (Az. 2001), the Court of Appeals of Arizona found that the Court
25 cannot specifically compel therapy which requires an admission - the Court
26 may only compel therapy.


27 In *State v. Brown*, 286 Kan. 170, 182 P.3d 1205 (Kan. 2008), the
28 Supreme Court of Kansas found that while termination of parental rights can

1 be based on a lack of effective therapy, the trial court cannot require a parent
2 to admit criminal conduct on order to reunite the family. Similarly, in *In re A.W.*,

3
4 the Supreme Court of Illinois found that the court can only require effective
5 therapy but cannot compel a parent to admit to a crime.

6 In the instant matter, the only reason the State is seeking to terminate
7 Ms. DeBerry's parental rights is her steadfast refusal to state that she
8 physically abused her son by holding an iron to the baby's face. Such an
9 admission is a crime. We are at termination of parental rights trial because she
10 refused to admit, which constitutes an improper compulsion. Accordingly,
11 because the Hearing Master, the State and DFS are requiring such admission,
12 the Fifth Amendment applies and that portion of the case plan requiring an
13 admission consistent with the lower court's findings is unenforceable. The
14 question before this Court is whether the natural mother's therapy that she
15 engaged in twice was effective without such admission. It is anticipated that
16 Ms. Jane Fortune will testify regarding the natural mother's therapy, her
17 observations of the natural mother with the child in her care and her years of
18 training and experience in dealing with abusive parents. It is anticipated that
19 there will be uncontroverted evidence that the therapy was, in fact, effective
20 and that termination of parental rights should be denied.

21 DATED this 2nd day of November, 2012.

22
23
24 
MELINDA E. SIMPKINS, ESQ.
State Bar No. 7911
25
26
27
28

CASE NO: D 446967

0196

JFC, LLC
Jane Fortune Counseling, LLC
Jane Fortune, LPC

Dillon Office:
1409 Highway 301 North
Dillon SC 29536

Mailing Address:
700 Elizabeth Court B1
Dillon SC 29536

Myrtle Beach Office:
4999 Carolina Forest Blvd Ext.
Myrtle Beach, SC 29579

janefortune09@gmail.com
843•506•0462 (clinical)

amygurd@gmail.com
843•268•4980 (appointments/billing)

July 7, 2012

To Whom It May Concern:

In regard to Ms. Keaundra DeBerry, she has been seen in my office for four visits, one to two hours per visit and I have made one home visit. On her initial visit Ms. DeBerry was screened for depression and anxiety and was found to be symptomatic of both, stating that she has felt "like this" ever since her children were removed and she has felt worse as she has tried to do what she needs to get regain custody of her children. In the process of scheduling with Ms. DeBerry she was found to understand at a very concrete level, taking what is said literally and requiring explanation and interpretation as to what has happened with her charges of neglect.

Time was spent in her stressing to her how she was responsible for the incident with her son by expanding the semantics of the incident. She stated that she was expected to say she "held the iron to (the child's) face," to which she said, "I would never do that." Ms. DeBerry was told that she was responsible for the burn on her child's face as she failed to supervise him properly, that she left her daughter, a child too young to properly supervise, watching him. There is a charge of neglect for failure to supervise in the court and it is necessary for her to take ownership to satisfy the court and Social Services that she understands her responsibility as a parent to prevent future injury to her children. Ms. DeBerry said she understood now that failure to supervise is neglect and neglect is a form of abuse. As she was not supervising properly she was neglectful.

Sessions continued in discussing "boundaries," and in the context of relationships (parental, peer and social) and the need to protect our children based on their age and level of understanding. She researched outside of session, at my request, age milestones for her children to gain a better understanding of how to protect, nurture and direct her children. On two of her visits she brought her one year old son, and he was observed at the home visit. She was observed to be a patient parent, keeping a careful eye on him and responding to him in a gentle but firm manner. Discipline was discussed and appropriate approaches to discipline according to age. She was responsive to hands on recommendations as to parenting him. During the home visit she was again a nurturing parent and the home was found to be safe and comfortable for her children.

Ms. DeBerry expresses heartfelt desire to have her children back with her. The transitioning them back to her home has been explored, how to address with them what has happened and how, when they do return home, there was be issues of adjustment for her and all three children. Having had experience as a Clinician in homes with children being reunified with parents I have discussed with Ms. DeBerry the need to be cognizant of seminal fears that can originate from children being removed from biological parents. She has been responsive to information and asked for help in her

children's current questions while they are with her mother. Ms. DeBerry presents as having worked hard to return to her family's home in South Carolina to prepare for return of her two older children.

Jane Fortune, MA, LPC

Jane Fortune, Licensed Professional Counselor

July 7, 2012



Las Vegas Municipal Court
Regional Justice Center
200 Lewis Avenue P.O. Box 3920
Las Vegas, Nevada 89127
(702) 382-2938

THE CITY OF LAS VEGAS,

Plaintiff,

vs.

DEBERRY, KEAUNDRA

Defendant

Violation Code: **5018**
Violation Description: **BATTERY/DOMESTIC VIOLENCE**
Violation Date: **4/2/2008**
Case No.: **C0716427A**
History No.: **1281007**
Amended Code:
Amended Description:

JUDGMENT

Complaint: Disposition: Finding: Disposition Date: **6/5/2008**

Date	Proceedings	Purpose	Court Date/Time	Dept
4/2/2008	CONTINUANCE GRANTED(CONT)	AR	5/5/08 1:00 pm	1
5/5/2008	BENCH WARRANT-CASH BL DUE=(BW.2983)			
5/9/2008	BENCH WAR SATISFIED-PAID(BWSP0509)			
5/9/2008	WALK-IN PARTIAL BAIL POSTED=(BPPWI150)	WI	5/19/08 9:30 am	1
5/19/2008	DISMISS PER MOTION OF CITY ATTORNEY(DCA)			
5/19/2008	READY FOR REFUND(RFR)			
5/30/2008	SEE NOTATION LINES:(N2)			
6/4/2008	REFUND DUE=(RD150)			
6/5/2008	REFUND ISSUED ON CHECK NO:(RI020089)			

I HEREBY CERTIFY that this is a full,
true and correct copy of the Judgment
Case # C0716427 A made and entered
on the above entitled action.

page 1
11-7-12
MUNICIPAL COURT CLERK

CASE NO. 446967

0200

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DIAGNOSTIC ASSESSMENT SUMMARY

Client: Keaundra Deberry

DOB: 11/20/86

Date of Assessment: June 6, 2012

Presenting Problem: Keaundra is attractive, heavy set, female who came to session alone, reporting that she had just moved here and needed help in getting her children returned to her. She describes feeling depressed when talking to kids who are in LA, explained to them when they would be coming to live with her in South Carolina. Two years ago, when living in Las Vegas with her children, 6 and 1 years old, her youngest was burned with an iron and both children are in the custody of the Department of Social Services, living with her mother in Louisiana. She states that the father of the children was in the apartment, however, was not in the room where the incident occurred. He is currently in jail. On the Patient Health Questionnaire (PHQ-9) she presents with moderate depression and low levels of anxiety on the Beck Anxiety Inventory.

History: She reports "being from South Carolina," but had moved to Las Vegas with her mother, who then relocated with her husband to Louisiana. Keaundra states she was in her apartment getting ready for work when her then one year old son burnt his face with a hot iron she had sat up on the dresser. Her then six year daughter was in the bedroom, Keaundra states she had just walked into the bathroom when she heard the iron fall. At the time she reports the burn was minimally and she treated it at home. Later, after she had left to live with her mother in Louisiana, her children were removed. She states she is due to go to court in July at which time they will determine whether or not parental rights should be removed. She currently is living in her family home with her one year old son.

Medication history, with diagnosis: She states that she saw Dr. Robin Shealy on June 4 and was put on Celexa 10 mg, 1x day.

History of counseling: None reported

Goals: Have children returned in Louisiana returned to her; lift symptoms of depression and anxiety.

Strengths: Client is attractively and neatly dressed, expresses self well, stating clearly she wants her children to return to her care.

Weaknesses: Presents as totally unclear as to why her children were removed from her care.

Age appropriate or functional assessments: On the PHQ-9 Keandra scored moderate depression and on with mild anxiety on the Beck anxiety inventory.

DSM-IV-TR Diagnosis:

Axis I: 309.028 Adjustment Disorder with mixed emotions

Axis II: V71.19

Axis III: History of hypothyroidism, asthma, high blood pressure and hypocalcaemia.

Axis IV: DSS involvement resulting in loss of children; moving; and relationship

Axis V: GAF: 60

Recommendations:

1. Therapeutic relationship is formed with Client and therapist.
2. Keandra understands the reasoning behind the removal of her children, taking appropriate responsibility for the incident.
3. Symptoms and causes of depression and anxiety are explored.
4. Probe for understanding of causes of her depression and anxiety, learning skills to manage symptoms.

Jane Fortune, LPC

Jane Fortune, MA, LPC
Licensed Professional Counselor

June 6, 2012

Date