

Provincial Court of Alberta
Calgary - Family
JAN 23 2013
FILED COPY

Application for an Apprehension Order

In the Provincial Court of Alberta
In the Matter of an Application under Section 19
of the Child, Youth and Family Enhancement Act

Regarding the child(ren)

born 2013/01/19
Date (YYYYMMDD)

1 My name is [redacted]
Name of applicant

I have the authority to act for a director.

2 [redacted]

I am applying for an order:

- authorizing the director to apprehend the child(ren).
- authorizing the director or * _____, and any peace officer called on to assist, to enter, by force if necessary, the place or premises specified in my affidavit below, and to search for and apprehend the child(ren).
- authorizing the director or * _____, and any peace officer called on to assist, to enter, by force if necessary, the place or premises specified in my affidavit below, and to search for and remove the child(ren) for the purpose of returning the child(ren) to the custody of the director.

(*Fill in this space only if someone who is not a director's delegate will be apprehending the child(ren).)

3 [redacted]

In support of my application, I make oath and say that:

I have reasonable and probable grounds to believe that the child(ren) needs intervention because:

[redacted] is in need of intervention as per CYFEA section 1(2)(g), the guardian of the child is unable or unwilling to protect the child from emotional injury due to exposure to domestic violence or severe domestic disharmony, the mental or emotional condition of the guardian of the child or of anyone living in the same residence as the child and the chronic alcohol or drug abuse by the guardian or by anyone living in the same residence as the child.

The mother, [redacted] has a CYIM history as a child in need and sibling from 2001 to 2011. Historical concerns included low-functioning parents, parental coping issues, domestic violence, sexualized behaviour by [redacted] and sexual abuse on [redacted] by her step-father. The most recent involvement with [redacted] was in January 2011. It was substantiated by [redacted] that she was having unprotected sex with anyone who asked her. CYIM history also indicates that [redacted] is developmentally delayed and has low cognitive functioning, however, there is no formal diagnosis noted. The father, [redacted] does not have any history with Child and Family Services.

[redacted] has a history of transiency, reporting that she has moved over 10 times in the past 3 years. [redacted] continues to return to her step-father's home, despite her reports that this home is unsafe due to verbal aggression. [redacted] also reports that she has been sexually assaulted numerous times since she was 15. She has reported that several of these were by strangers and one was by a man at her mother's house and this happened repeatedly for one and half months in early 2012. She continued to return to her mother's house despite these assaults continuing.

There are concerns regarding the father, [redacted] in regards to his ability to make appropriate choices and coping. [redacted] currently lives with his female cousin with whom he had an incestuous relationship with 3 years ago. [redacted] and this cousin have had a physically violent relationship in the past including punching, kicking, pulling hair and pushing into walls. [redacted] is planning on returning to this home when discharged from the hospital. It has been reported that when [redacted] is stressed, he consumes beer. This has resulted in him being unable to attend to the hospital to see [redacted] and to bring [redacted] home from the hospital. He is also aware of the sexual assaults that have happened to [redacted], however, cannot report details as he chooses not to think about them. In addition, [redacted] has no contact with his first child and there is an allegation that this is due to his attempt to shake this child

For Office Use Only		
Name of Caseworker [redacted]	Worksite Number 557	Worksite Name Plaza 14 / Calgary Child Advocacy Centre
Child's ID Number(s) [redacted]		

