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 Attorney for: E. a minor

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF XXX**

In the Matter of

E,

a Minor.

Case Number: CK XXXX

**STATEMENT OF MINOR'S DEPENDENCY
COURT COUNSEL RE § 241.1 HEARING**

Date: 6/X/07
Time: 8:30
Dept.: XXX

Welfare and Institutions Code § 241.1(a) provides that whenever a minor appears to come within the description of both § 300 and § 601 or 602, the county probation department and the child welfare services department shall recommend to the court which status will serve the best interests of the minor and the protection of society. On behalf of the minor, E., I am requesting that the following statement be included in the § 241.1 assessment.

As attorney for E., appointed by the juvenile dependency court, it is my recommendation that E. remain a dependent of the juvenile court and not be deemed a ward of the court under Welf. & Inst. Code § 602.

Welf. & Inst. Code § 241.1(b) requires consideration of “...the age of the minor, the prior record of the minor’s parents for child abuse, the prior record of the minor for out-of-control or

1 delinquent behavior, the parents' cooperation with the minor's school, the minor's functioning at
2 school, the nature of the minor's home environment, and the records of the other agencies which
3 have been involved with the minor and his or her family."

4 E. was detained in November 2006, because her mother was incarcerated, her father's
5 whereabouts were unknown, and her grandmother was no longer able to care for her. E. suffers
6 from severe emotional and behavioral problems, related to her mother's incarceration, her father's
7 abandonment, and possible sexual abuse by her stepfather. She is a victim-witness in a pending
8 criminal case against an adult male who attempted to involve her in prostitution in February 2007.
9 Ironically, this same incident of sexual exploitation gave rise to the pending § 602 adjudication.

10 E. has significant special needs that could best be addressed through the foster care system.
11 She is barely 14 years old. Although she is an articulate and intelligent child, the last grade she
12 actually completed was the 4th grade. She has not yet been assessed for special educational needs
13 or mental health services. Her county social worker has been working with the Resource
14 Utilization Management (RUM) unit to find a specialized placement that will meet E's special
15 needs.

16 For the reasons stated above, I believe that the dependency court's protection and support is
17 better suited to address the needs of this young and vulnerable adolescent. The Social Services
18 Agency can provide counseling, mental health treatment, and education services that will assist E.
19 in building positive skills for adult life and avoiding further misconduct. I recommend that,
20 pursuant to Welf. & Inst. Code § 241.1, E. remain a dependent of the court and not be deemed a
21 ward of the court under Welf. & Inst. Code § 602.

22
23 Dated: May ___, 2007

Respectfully submitted,

24 XXXXXX XXX XXXXXX

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26 _____
27 By: XXXX XXXX
28 Attorney for Minor E.