

Direct Examination of CPS Worker, Susie Jones

Prosecutor: Ms. Jones would you please state for the record your full name and occupation?

Jones: Susie Jones. I am employed with Anystate Child Protection Services. I am assigned to the Kryptonite City office.

Prosecutor: What do you do at Child Protection Services?

Jones: I investigate child abuse and neglect allegations.

Prosecutor: Did you have occasion to conduct an investigation on or about September 19, 2017?

Jones: Yes.

Prosecutor: Who was the subject of that investigation?

Jones: Daisy Smith

Prosecutor: Tell us about that investigation.

Jones: On September 21, 2017, I received a report from our intake unit of allegations of possible sexual and physical abuse of Daisy Smith. The allegation was reported by her school counselor, Ms. Sally Knowsit. I went to the child's school and talked with Ms. Knowsit to get more information regarding the allegations.

Prosecutor: What were the allegations?

Jones: The allegations were that Daisy had told Ms. Knowsit that her father had hurt her "cat" and that it hurt when she went to the bathroom. Ms. Knowsit also informed me that she had seen Daisy in the bathroom with a little boy. Daisy was trying to put his penis in her vagina saying "don't that feel good". Ms. Knowsit also told me that she

Defender: Objection your honor, hearsay.

Judge: Sustained.

Prosecutor: Ms. Jones, would you please tell us your next steps as you continued your investigation into these allegations?

Jones: Yes, after I left the school from talking to Ms. Knowsit, I waited until around 5:00 p.m. and then went to Daisy's house.

Prosecutor: Who was there?

Jones: The door was answered by Mrs. Smith. I identified myself as CPS and was allowed to go inside. Mr. Smith and Daisy were at home as well.

Prosecutor: Would you tell us what happened next?

Jones: Sure. When I entered the house I was shown into the living area. Daisy was on the couch watching TV. I quickly looked over Daisy to see if there were any visible signs of physical abuse. I noticed that there were some type of marks on her legs. I informed the Smith's that some allegations had been made regarding Daisy and that I would like to speak with them about those allegations without Daisy present. They complied and asked Daisy to go to her room and play for a while. Daisy got up and walked down the hall and entered a door at the end of the hallway. When the door closed behind Daisy, I told the Smith's that allegations that Daisy had been both sexually and physically abused had been made. They asked me what allegations had been made. I let them know that Daisy had reported to someone that her father had hurt her "cat" and that it hurt when she went to the bathroom. It was also reported that Daisy had bruises or marks on her legs and buttock.

Prosecutor: How did the Smith's react to the allegations?

Jones: Mrs. Smith said that the allegations were "just crazy". Mrs. Smith stated that she loved Daisy and would never do anything to hurt her and neither would Mr. Smith. I asked the Smith's how they would explain Daisy's knowledge of sexual matters. They did not respond to the question. Mr. Smith just said he was going outside to smoke a cigarette.

Prosecutor: What happened next?

Jones: I continued talking with Mrs. Smith. I asked if Daisy could have seen them having sex. Mrs. Smith was adamant that that was not possible. She stated that they were always very careful to lock their bedroom door when having sex and that Daisy had never seen either one of them naked. I asked Mrs. Smith about the bruises on Daisy's legs. Mrs. Smith said that Daisy must have fallen. She stated that Daisy bruises easily and that she had even talked to the doctor about that before. I told Mrs. Smith that I needed to speak with Daisy in private. Mrs.

Smith led me down the hallway to Daisy's room to see her. On the way down the hall I saw an electrical cord hanging on the handle of the bathroom door.

Prosecutor: Did you speak with Daisy?

Jones: Yes.

Prosecutor: Did you observe anything unusual or that gave you concern about Daisy?

Jones: Yes, first of all she was very withdrawn and quite. From her demeanor it was clear that she was scared. She had linear marks and bruises in various stages of healing on her legs. When her mother left the room, Daisy seemed to relax slightly. I talked to Daisy for a few minutes and then she began to respond to me a little. From the statements she made to me. I felt like Daisy was afraid of her parents.

Prosecutor: What did you do next?

Jones: I went back into the living area, again passing by the bathroom. I looked at the cord hanging from the door knob. The plug end of the cord had been taken off. I went on into the living area. Mrs. Smith was not in the room, but Mr. Smith had returned from outside. So I talked with him.

Prosecutor: What did you talk to Mr. Smith about?

Jones: I asked him about the bruises on Daisy. He said that there wasn't anything wrong with parents disciplining their children. He said that a couple of days ago Mrs. Smith used a "switch" on Daisy as punishment. About that time Mrs. Smith re-entered the room. I asked them both about the cord I had noticed on the bathroom door knob. I asked what it was for. Neither parent replied. I asked if I could take the cord with me and Mrs. Smith said "sure, we don't need it anymore anyway".

Prosecutor: Ms. Jones, why did you take the cord with you?

Jones: Because it was what was used to put those marks on Daisy.

Prosecutor: What did you do next Ms. Jones?

Jones: I explained to the Smith's that it was my job to protect Daisy and to make sure that she was safe. That as a result of my investigation so far, I would be taking Daisy into custody and removing her from the home. I asked if there was a relative or other appropriate person that I could place her with. The Smiths

refused to consent to placement with anyone else. Mrs. Smith got angry and refused to speak to me any more with her attorney present. I told Mrs. Smith to go get Daisy and that we would be leaving. Mrs. Smith went down the hall and got Daisy and brought her to me. I explained to the Smith's that there would be a court hearing soon and it would be up to the court when Daisy would be able to return home. I took Daisy and left.

Prosecutor: Where did you take Daisy?

Jones: I took her back to my office.

Prosecutor: What, if anything, did you do when you got to your office with Daisy?

Jones: I took Daisy to my office and asked her to have a seat. Then I went and got a female CPS worker from down the hall to help me and we went back and took pictures of Daisy. We took photos of her face for identification purposes, then of her legs and buttocks to document the electrical cord marks on the child.