

IN RE: B.CD. & B.CB.

* IN THE
* SUPREME COURT OF
* MARYLAND
* September Term, 2025
* Petition No. 309

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BRIEF OF AMICI CURIAE IN SUPPORT OF PETITION FOR CERTIORARI¹

Amici, the American Civil Liberties Union (“ACLU”), the ACLU of Maryland, Angela Burton, Black Families Love & Unite, Blessings in Transformation, the Center for Constitutional Rights, CUNY Family Defense Clinic, Civil Rights Corps, Dorothy Roberts, Elephant Circle, JMACforFamilies, Legal Services for Prisoners with Children, Mining for Gold, the MJCF: Coalition, Movement for Family Power, Operation Stop CPS, South East Family Freedom Alliance, UpEND, and The Bronx Defenders submit this brief to aid the Court in understanding the full scope of civil liability that encompasses a finding of neglect pursuant to Courts and Judicial Proceedings Article §§ 3-801, et seq. (“The CINA Statute”), which was misunderstood by the Appellate Court of Maryland.

The Appellate Court’s conclusion that Maryland’s Safe Haven law does not include immunity from liability under the Child in Need of Assistance (“CINA”) statute will harm children and families in Maryland. The law creates an important pathway for parents to make a safe care plan for their newborns when necessary and provides civil and criminal immunity so that parents are not dissuaded from utilizing this safe choice. Nothing in the statute requires a CINA finding for the State to take custody of the newborn. The CINA Statute comprises a part of the “child welfare system”—what advocates often call the family policing, or family regulation, system—which disproportionately harms poor families and families of color. *Amici* explain that interpreting the Safe Haven statute as the Appellate Court suggests will discourage pregnant people—particularly those, like Ms. C., who have older children at home whom they wish to parent—from utilizing the program for fear of the collateral consequences of a CINA finding.

Amici urge this Court to grant the Petition for Certiorari and clarify that Maryland’s Safe Haven law includes immunity from CINA liability.

Argument

I. CINA is a System That Punishes, Rather Than Supports, Families.

¹ *Amici*’s statements of interest, Statement of Intent to File Supplemental Brief, Certificate of Word Count, and Certificate of Service are included in the Appendix.

The family policing system purports to be a non-adversarial system dedicated to keeping children safe. However, for the families subject to it, the system often operates to police, punish, surveil, and isolate.

For many, the family policing system's most profound impact is that of family separation.² Social scientists have established that “the moment when a child is taken from [their] parents is a source of lifelong trauma, regardless of how long the separation lasts.”³ Removal can damage a child even when their parents are far from perfect,⁴ and subsequent reunification does not cure those harmful effects.⁵ Parents utilizing Maryland's Safe Haven law are not immune from this risk, as a CINA finding can result in an involuntary removal of older or subsequent children from their care.

But, the harm of family policing begins long before separation. Many families' first contact with the family policing system is through an investigation, the majority of which are unsubstantiated.⁶ Investigations, nonetheless, subject families to expansive surveillance. Investigations routinely include unannounced home searches and invasive questioning of parents, including about their mental and medical health, and their relationship histories, and can involve questioning of friends, family, neighbors, and service providers.⁷ Children are also interrogated by caseworkers, and in some cases, strip-searched. Research shows, parents who have been investigated are less likely to ask for professional help for fear of another investigation.⁸

For investigations that result in a court filing, the harms do not abate. CINA cases require parents to abide by court-ordered “care plans.” These plans routinely include unannounced home searches, myriad court-ordered programs, and restrictions on parental activity and on who may enter the family's home or have contact with the children. Trusted service providers may be called to testify against their own client or patient, and their clinical notes may be entered into evidence.⁹ Through all of this, if parents fail to sufficiently comply, they risk family separation and even termination of parental rights.

Even after a case is closed, collateral consequences persist. Following a CINA finding, parents' information may be included in Maryland's child abuse registry. A parent listed on the

² Vivek Sankaran, et al., *A Cure Worse Than the Disease? The Impact of Removal on Children and Their Families*, 102 Marq. L. Rev. 1161, 1163-94 (2019).

³ Anna Arons, *An Unintended Abolition: Family Regulation During the Covid-19 Crisis*, 12 Columbia J. of Race and L., 1, 18-22 (2022).

⁴ Shanta Trivedi, *The Harm of Child Removal*, 43 New York University Review of Law & Social Change 523, 527 (2019).

⁵ Johayra Bouza et al., *The Science is Clear: Separating Families Has Long-Term Damaging Psychological and Health Consequences for Children, Families, and Communities*, Soc'y for Research in Child Dev., (2018).

⁶ *Maryland Child Welfare Data*, HHS, <https://cwoutcomes.acf.hhs.gov/cwodatasite/byState/maryland/> (showing nearly 71% of CINA investigations were unsubstantiated in 2023).

⁷ See We Be Imagining Podcast, *Minisode 4 - Mother's Day in the Trenches: Abolishing the Child Welfare System*, Spotify at 18:00 (May 10, 2020), <https://open.spotify.com/episode/4ZgpcBbuVX1P7AdOq9iQXF>.

⁸ Kelley Fong, *Concealment and Constraint: Child Protective Services Fears and Poor Mothers' Institutional Engagement*, 97 Social Forces 1785 (2010).

⁹ Dorothy Roberts, *Torn Apart* at 163-165; 183-185 (2022).

registry may lose their job, or be barred from working in early child care, or as educational, custodial, cafeteria, security, transportation or administrative staff in hospitals or schools, and in-home health care.¹⁰ Parents on the registry are more likely to be separated from their children if there are future child welfare investigations, and are often precluded from being caregivers (e.g. custody, guardian, foster parent) to loved ones.¹¹

II. Coupling CINA with Safe Haven Will Disproportionately Harm Black and Poor Families.

CINA regulates and separates Black families at disproportionate rates, and Black children and families fare worse at nearly every stage of the system. On the front end of CINA, in 2023, white children constituted approximately 38% of Maryland's child population, but only 26% of children with at least one substantiated allegation of maltreatment.¹² Conversely Black children constituted 30% of Maryland's child population, but 36% of the children with a substantiated allegation of maltreatment.¹³ In 2022, Black children entered Maryland's foster system at a rate 2.4 times higher than the rate of white children. In fiscal year 2022, Black children accounted for 56% of children in out-of-home placements, whereas white children represented only 26%.¹⁴

Just as race is a strong predictor of who the family policing system targets, so too is poverty. Families in poverty are 22 times more likely to be involved in the family policing system than families living above the poverty line.¹⁵

III. CINA's Historical Lineage Is Deeply Rooted in Anti-Black Racism.

Far from happenstance, today's realities stem from our nation's long history of using family separation as a tool of coercion and subjugation.

Forced family separation was essential to the maintenance of chattel slavery in the United States from 1619 until 1865, via the Transatlantic Slave Trade and the horrors of the auction block.¹⁶ In Maryland and Virginia alone, about one third of enslaved children experienced family separation.¹⁷ Following the abolition of slavery, Reconstruction lawmakers were explicit that the

¹⁰ Md. Code Ann., Fam. Law § 5-714 (2017); Md. Human Serv. § 1-202 (2019); Md. Code Regs. 13A.16.03.03 (2025); Child Welfare Information Gateway, *Disclosure of Confidential Child Abuse and Neglect Records*, U.S. Dep't of Health & Hum. Servs., Admin. for Child. & Fam. (2022), <https://www.childwelfare.gov/resources/disclosure-confidential-child-abuse-and-neglect-records/>.

¹¹ MD Code of Rules §07.02.25.03 (2024).

¹² Maryland – Child Welfare Outcomes, U.S. Dep't. of Health and Human Services, Children's Bureau <https://cwoutcomes.acf.hhs.gov/cwodatasite/byState/maryland#footnote8>.

¹³ *Id.*

¹⁴ *FY 2023 State of Maryland Out-of-Home Placement and Family Preservation Resource Plan*, Maryland Governor's Office of Crime Prevention & Policy (2024) <https://gocpp.maryland.gov/wp-content/uploads/AGENCY-FINAL-REVISED-2023-JCR-Pages-267-268-HS-%C2%A7-8-703e-GOCOPYVS-FY-2023-State-of-Maryland-Out-of-Home-Placement-and-Family-Preservation-Resource-Plan-MSAR-6523.pdf>

¹⁵ Martin Guggenheim, *The Role of Counsel in Representing Parents*, American Bar Association, (2016).

¹⁶ Roberts, *Torn Apart* at 90.

¹⁷ Heather Andrea Williams, *How Slavery Affected African American Families*, National Humanities Center, <https://nationalhumanitiescenter.org/tserve/freedom/1609-1865/essays/aafamilies.htm> (April 9, 2025).

Thirteenth and Fourteenth Amendments would ensure the constitutional right to family integrity for all.¹⁸

Nevertheless, the practice of legally-sanctioned family separation along racial lines continued. Following the Civil War, southern states enacted Black Codes, and later Jim Crow laws, and empowered courts to forcibly separate Black families whenever the court deemed such separation in the child's "best interest"—a governing standard that still exists in dependency proceedings today.¹⁹ Under these laws, Black children were "bound out" to work for plantations over their parents' objections if courts "found the parents to be unfit, unmarried, or unemployed."²⁰

In the North, social reformers established charities to "rescue" children of poor European immigrants from their parents by separating them from their parents, placing them in private foster homes and forcing them to labor for their foster parents in exchange for their keep.²¹ Eventually, this practice became known as the Orphan Train movement, widely recognized as the genesis of the United States' foster system.²²

By the early 20th century, many states had enacted government-funded welfare programs to provide aid to "deserving" husbandless mothers—primarily white, widowed, or unmarried women with children—with the goal of preventing the dissolution of fatherless (white) families through child removal. Through "suitable home" rules, states structurally barred Black mothers from accessing this aid. In 1931, 96% of welfare recipients were white, while only 3% were Black.²³

While the initial purpose of these welfare programs was to prevent family separation, as Black families began accessing welfare benefits en masse following Civil Rights Movement gains, child welfare policy became more punitive and focused on child removal. In 1974, Congress incentivized family separation by conditioning allocation of federal funds on states' placement of children to the foster system.²⁴ Further, in the 1990s, new laws were enacted which prioritized involuntary termination of parental rights and adoption over family reunification by accelerating the timeline for termination of parental rights, and providing federal bonuses to states that increase the number of adoptions, without comparable funding to increase the number of family reunifications. As the infrastructure and funding for family surveillance and separation expanded, funding for direct services to poor families shrank; because Black families experienced poverty at

¹⁸ See, e.g., Cong. Globe, 38th Cong., 1st Sess. 1324. (1864) (remarks of Massachusetts Sen. Wilson); Cong. Globe, 38th Cong., 2d Sess. 193 (1865), (remarks of Iowa Rep. Kasson).

¹⁹ Roberts, *Torn Apart* at 97.

²⁰ *Id.* at 97 (internal citation omitted).

²¹ Alan J. Dettlaff, *Confronting the Racist Legacy of the American Child Welfare System: The Case for Abolition* 39-40 (2023).

²² *Id.* at 39-41.

²³ Dorothy Roberts, *Shattered Bonds* at 175-176 (2001)

²⁴ Miriam Mack, *The White Supremacy Hydra: How The Family First Prevention Services Act Reifies Pathology, Control, And Punishment In The Family Regulation System*, 11 COLUM. J. RACE & L. 783-84, 803-804 (2021).

higher rates, these policy reforms ensured that families of color have disproportionately borne the brunt of these punitive policies.²⁵

Maryland's CINA system of today is borne out of this history—one of disregard for the integrity of poor families and families of color—and continues to be structured accordingly.

IV. Conclusion

Amici believe that Maryland's Safe Haven program provides important relief for parents struggling with the prospect of raising a child, and are concerned that the lower court's decision will exacerbate the already disproportionate harms of family policing, and will deter parents from using this safe option. *Amici* urge this court to grant certiorari and clarify that Safe Haven includes immunity from civil liability under CINA.

Respectfully submitted,

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²⁵ Dorothy Roberts & Lisa Sangoi, *Black Families Matter: How the Child Welfare System Punishes Poor Families of Color*, The Appeal (Mar. 26, 2018), available at www.theappeal.org/black-families-matter-how-the-child-welfare-system-punishes-poor-families-of-color-33ad20e2882e/

STATEMENT OF INTENT TO FILE SUPPLEMENTAL BRIEF PURSANT TO RULE 8-
511(E)(2)

Should this Court grant the petition for a writ of certiorari, *amici* intend to seek consent of the parties or move for permission to file an amicus curiae brief on the issues before the Court.

CERTIFICATE OF WORD COUNT AND COMPLIANCE WITH 8-112

1. This brief contains 1900 words, excluding the parts of the brief exempted from the word count by Rule 8-503.
2. This brief complies with the font, spacing, and type size requirements stated in Rule 8-112.

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to Rule 20-201(g), on October 6, 2025, the following Brief of Amici Curiae in Support of Petition for Certiorari was electronically filed via the MDEC File and Serve.

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Appendix

INTEREST OF AMICI

Amici, the American Civil Liberties Union (“ACLU”), the ACLU of Maryland, Black Families Love & Unite, Angela Olivia Burton, Blessings in Transformation, the Center for Constitutional Rights, the City University of New York (CUNY) School of Law Family Defense Clinic, Civil Rights Corps, Dorothy Roberts, Elephant Circle, JMACforFamilies, Legal Services for Prisoners with Children, Mining for Gold, the MJCF: Coalition, Movement for Family Power, Operation Stop CPS, South East Family Freedom Alliance, UpEND, and The Bronx Defenders are civil rights organizations and organizations representing families impacted by the family policing system that witness and experience the harms that the family policing system inflicts on poor families and families of color. Entanglement in the family policing system can have long lasting harms, and bringing families into the family policing system through the Safe Haven laws will hurt, not help, families. *Amici* agrees with Appellants that the Court should grant certiorari in order to clarify that Maryland’s Safe Haven law includes immunity from Child in Need of Assistance (“CINA”) liability.

Amici write to highlight for the Court the harms associated with a CINA finding, and to underscore that it will be predominantly poor families and families of color who will be most negatively impacted by allowing the Appellate Court’s decision to stand. *Amici* seek to underscore that the interpretation Appellant advocates for would harm families by discouraging use of the Safe Haven Law due to fear of the consequences of a CINA prosecution, and thus would undermine the intent of the law.

A fuller description of *amici*’s identity and interests are included below:

The **American Civil Liberties Union (“ACLU”)** is a nationwide, non-profit, non-partisan organization with nearly two million members and supporters dedicated to the preservation and defense of civil liberties. The ACLU has long been committed to protecting individuals’ rights to make their own decisions to shape their lives and intimate relationships, to protect against government overreach into the family and home, and to ensure federal and state laws are interpreted and applied in conformity with constitutional guarantees, including due process and family integrity.

The **ACLU of Maryland** is a regional affiliate of the ACLU. The ACLU of Maryland works to advance the civil rights and civil liberties of Marylanders in the courts, in legislative and policy arenas, and in the community. The ACLU of Maryland directly serves community members who rely on the state and federal constitutions’ guarantees of due process and family integrity, as well as statutory substantive civil rights protections and procedural safeguards.

The ACLU and ACLU of Maryland recognize that the family regulation system in the United States, otherwise known as the child welfare system, was built on a foundation of white supremacy. The organizations have an interest in protecting the due process rights of parents, especially low-income mothers, guardians, and children who are Black, Indigenous, immigrants, LGBTQ, and people with disabilities as they navigate the family regulation system. The ACLU and ACLU of Maryland support this brief’s arguments regarding the due process and family integrity concerns raised by the conflation of actions taken under the auspices of Maryland’s Safe Haven law as neglect under Children in Need of Assistance (“CINA”) laws.

Angela Burton is a community lawyer, scholar, and public servant with over thirty years of experience advocating for the rights of parents and children in the family policing system, commonly known as the child welfare system. Her commitment to social justice is driven by a

deep understanding of the systemic inequities faced by vulnerable families. She has served in the faculty at New York University School of Law, Dyracuse University College of Law, and The City of New York (CUNY) School of Law. She has consistently fought to protect the human, constitutional, and civil rights of marginalized individuals, ensuring their voices are heard. Her recent publications include How judges can use their discretion to combat anti-black racism in the United States family policing system, *Family Court Review* (2023), *Liberate the Black Family from the Family Policing System: A Reparations Perspective on Ending Anti-Black Racism in “Child Welfare”* *Family Integrity and Justice Quarterly* (2022), and *Toward Community Control of Child Welfare Funding: Repeal the Child Abuse Prevention and Treatment Act and Delink Child Protection from Family Well-Being*, *Columbia Journal of Race and Law* (2021).

Black Families Love & Unite (BLU), a parent-led organization, is dedicated to creating alternatives to the child welfare system, which disproportionately harms Black and low-income families. We support Ms. C’s petition to ensure Maryland’s Safe Haven law protects parents from CINA prosecution. The Appellate Court’s ruling discourages safe surrenders, undermining child safety and family unity. Children are part of a whole family—when one is harmed, all suffer. We urge the Maryland Supreme Court to grant certiorari and clarify this protection to safeguard families.

Blessings in Transformation is a community-based organization led by directly impacted families and children, committed to keeping families safe, strong, and together. We provide advocacy, legal education, and direct support to prevent unnecessary family separation and to uplift families disproportionately targeted by family policing, particularly poor families and families of color. We support this amicus brief because parents who seek help through laws

like Safe Haven must be met with compassion, not prosecution. Allowing courts to interpret these protections as grounds for neglect only deepens family harm, undermines trust in systems meant to provide safety, and disproportionately endangers marginalized families.

Founded in 1966, the **Center for Constitutional Rights** (“CCR”) is a national, nonprofit legal, educational, and advocacy organization dedicated to protecting and advancing rights guaranteed by the United States Constitution and international law. Advocating against punitive treatment of marginalized families has been central to much of CCR's decades-long legal work. CCR filed an amicus in *K.W. v. The City of New York*, detailing the racialized history and discriminatory impacts of the family policing system on families of color. CCR has challenged government punishment at all levels of government in cases such as *Floyd, et al. v. City of New York, et al*, which successfully challenged racially discriminatory stop and frisk practices by the New York City Police Department. Additionally, CCR has used open records litigation to support nationally known family rights advocates.

The **CUNY Law Family Defense Clinic** is a project of Main Street Legal Services, the clinical arm of the City University of New York School of Law, whose mission is to train outstanding social justice lawyers, especially from underrepresented communities. The Family Defense Clinic represents parents and families at every phase of child welfare proceedings, and works to secure the fundamental rights of families facing surveillance, regulation, and separation by the state. Through direct advocacy, movement support, and systemic advocacy, the Family Defense Clinic seeks to ensure families in New York thrive without harmful state intervention.

Civil Rights Corps is a national civil rights non-profit legal organization dedicated to challenging systemic injustice in the American legal system. It works with individuals directly impacted by the legal system, their families and communities, activists, organizers, judges, and

government officials to create a legal system that promotes equality and freedom. CRC has worked extensively to ensure that courts apply the appropriate level of scrutiny—strict scrutiny—as a prerequisite to the deprivation of a fundamental liberty interest.

Dorothy Roberts is a George A. Weiss University Professor of Law & Sociology at the University of Pennsylvania, with joint appointments in the Departments of Africana Studies and Sociology and the Law School, where she is the inaugural Raymond Pace and Sadie Tanner Mossell Alexander Professor of Civil Rights. She is also Founding Director of the Penn Program on Race, Science & Society and a MacArthur Fellow. She is an expert on racial identity and reproductive oppression and has devoted her scholarship and advocacy to challenging racial inequities and injustices in U.S. institutions, including the child welfare, foster, and adoption systems. Her major books include the award-winning *Killing the Black Body: Race, Reproduction, and the Meaning of Liberty* (1997); *Shattered Bonds: The Color of Child Welfare* (2001); *Fatal Invention: How Science, Politics, and Big Business Re-create Race in the Twenty-first Century* (2011); *Torn Apart: How the Child Welfare System Destroys Black Families—And How Abolition Can Build a Safer World* (2022); and *The Mixed Marriage Project: A Memoir of Love, Race, and Family* (forthcoming 2026).

Just Making a Change for Families (JMACforFamilies) is a non-profit led by persons impacted by family policing and all of its tentacles. Our work is to dismantle the family policing system while simultaneously investing in community support that keeps families together. We build by offering advocacy training, court support, community based resources, mental health services, City, State and Federal legislative work. Our goal is to provide the support families need to prevent family separation by a system that disproportionately impacts Black families and families with limited resources, creating horrible outcomes for the children and generational

harm. Building safe resources for vulnerable communities is how we remove systemic barriers and build racial equity.

Elephant Circle is a community-led birth justice nonprofit that aims to protect and support all families during the perinatal period. Its work is focused on dismantling systemic barriers to perinatal health care and eliminating surveillance and policing in the healthcare context. Its team supports parents undergoing child protective services investigations, and its parent defense program represents parents in dependency and neglect court proceedings.

Legal Services for Prisoners with Children (“LSPC”) is a nonprofit public benefit corporation with over 45 years of experience advocating to release incarcerated people, restore human and civil rights, and reunify families and communities. Guided by the vision of people in prison and of formerly incarcerated individuals working in unity with attorneys and policy advocates, LSPC seeks to transform the injustice of mass incarceration. LSPC provides legal training, legal technical assistance, and advocacy support to legal services offices throughout the state on legal and policy issues affecting incarcerated, formerly incarcerated and convicted individuals and their families.

Mining For Gold's mission is to to communally nurture freedom dreams in the ongoing movement toward racial justice and liberation by establishing necessary relationships with those most impacted by federal and state policies and practices. Our vision is to actualize a society where we flourish without racialized oppression and carceral restrictions to re-claiming humanity.

The **MJCF:Coalition** is deeply committed to protecting Black, Indigenous, and other families of color from the harms of family policing systems that disproportionately criminalize poverty and motherhood. We strongly support Ms. C’s appeal and the principle that Maryland’s

Safe Haven law must provide true immunity, not punishment, for parents who responsibly and courageously seek care for their newborns. If the lower court's ruling is allowed to stand, it will not only undermine the intent of the Safe Haven Act but also perpetuate a dangerous precedent that places vulnerable families—particularly poor women and women of color—at even greater risk of state surveillance and family separation. The MJCF:Coalition joins this amicus brief in urging Maryland's Supreme Court to grant certiorari and affirm protections that safeguard both children and families.

Movement for Family Power (MFP) is a national, abolitionist movement hub and incubator, cultivating and harnessing community power to end family policing and build a world where all families can thrive. Founded in 2018, MFP shifts narratives and supports grassroots organizers and lived experts on the frontlines of dismantling the family policing system through our three-pronged approach--connection, capacity, and care. MFP advocates for family safety and well-being outside of carceral systems and believes that interpreting Maryland's Safe Haven law to allow for family policing investigation and prosecution will further imperil already marginalized families to whom the state often responds with punishment rather than support. MFP regularly supports amicus curiae briefs and other legal briefings that challenge pervasive and ongoing threats to family integrity.

Operation Stop CPS supports the amicus brief because we recognize how this case has far-reaching implications beyond Maryland, particularly for families in states like North Carolina, where we organize. Across the country, we see Safe Haven laws being misinterpreted or weaponized—most often against poor families and families of color. We believe that strong legal clarification is urgently needed to prevent further harm and criminalization. We support

certiorari in this case not because we believe the system can be perfected, but because we believe in exposing its harms and building toward its abolition.

The **South East Family Freedom Alliance** is a regional movement hub addressing the harms of family policing by centering community empowerment and healing. The South East Family Freedom supports this Amicus Curiae. Maryland's Safe Haven law allows struggling parents like Ms. C to make an impossible choice in the interests of their children's wellbeing with the knowledge that they will be immune from criminal and civil liability. Finding that Ms. C neglected her children defies the guarantee of civil immunity and the framework of the Safe Haven law, in favor of a precedent that punishes and endangers families, and disproportionately low-income families and families of color.

The **UpEND Movement** works to end the harmful family policing system and build real supports for families. We are signing on to this amicus brief because Ms. C's case shows how families, especially Black and Brown families, and families experiencing poverty, are punished even when they seek help. Maryland's Safe Haven law was created to give parents a safe option without fear of punishment, but the lower court's decision does the opposite and puts families at greater risk. We believe the Court should make clear that Safe Haven protections include freedom from family policing charges, so parents can trust these laws and children can be cared for without families fearing separation or surveillance

The Bronx Defenders is a nonprofit provider of innovative, holistic, client-centered criminal defense, family defense, immigration and civil legal services, and social work support to low-income people in the Bronx. The attorneys, social workers, and parent advocates in BXD's Family Defense Practice represent parents and caregivers in proceedings alleging child abuse or neglect and termination of parental rights proceedings in New York City Family Court, Bronx

County. BXD has represented approximately 15,000 parents and caregivers and represents an additional 1,200 parents each year.