



has 6,626 members. *Amicus* promulgates professional standards and the *NASW Code of Ethics*, supports and publishes research, and provides continuing education. The organization also advocates for sound policies concerning its membership's core capabilities, responsibilities and mission.

3. *Amicus* also develops and adopts policy statements pertaining to various social issues. In 1977, *Amicus* adopted its policy on gay, lesbian, and bisexual issues. It revised and expanded that policy in 1987, 1993, 1996 and 2005.
4. *Amicus* is committed to advancing policies and practices that will improve the lives of children, including those raised by gay and lesbian parents. *Amicus* is concerned that children will suffer great harm if they are taken from parental figures without a consideration of the children's best interests.
5. *Amicus* can assist the Court by bringing a unique empirical perspective to the case. The accompanying brief shows, based on empirical research, that when a relationship between a child and parental figure is terminated, the child is typically harmed. This is true regardless of whether the parent is gay, lesbian or heterosexual, and regardless of whether the parent is linked to the child by biology. And in this case, Catherine D.W. has formed a genuine, fully-developed parent-child relationship with the children, which the legal parent has consented to and encouraged. Deanna, the biological mother, *intended* for Cathy to be a parent. She fostered the parent-child relationships and sought to have those parent-child relationships recognized to the fullest extent Deanna and Cathy believed to be allowed by law. Therefore, in order to protect children, the best interests of the children must be considered before they are taken from a parental figure such as Catherine D.W.

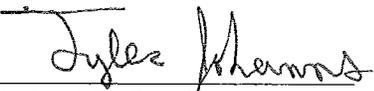
6. *Amicus* explains why Catherine D.W.'s position, requiring consideration of the child's best interests, is supported by empirical research and represents best social work practices.
7. Illinois Supreme Court Rule 345 provides that an *amicus* brief "shall be filed on or before the due date of the initial brief of the party whose position it supports." Because Catherine D.W.'s brief is due on June 4, 2012, this motion and brief are timely filed.

WHEREFORE, *Amicus* National Association of Social Workers and its Illinois Chapter respectfully requests that this Court grant this motion for leave to file *instanter* a brief as *amicus curiae* in this action.

Dated: June 4, 2012

Respectfully submitted,

By: \_\_\_\_\_

  
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**NOTICE OF FILING AND CERTIFICATE OF SERVICE**

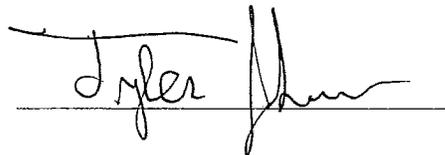
I, Tyler G. Johannes, an attorney, hereby certify that on June 4, 2012, I caused to be filed with the Clerk of the Fifth District Appellate Court the foregoing **MOTION OF NATIONAL ASSOCIATION OF SOCIAL WORKERS FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE**. I further certify that I caused one copy of the foregoing Motion to be mailed to the following attorneys at the following addresses, via United States mail, postage prepaid, on June 4, 2012:

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Dated: June 4, 2012

A handwritten signature in black ink, appearing to read "Tyler Johannes", is written over a horizontal line.



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