

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ARKANSAS  
JUVENILE DIVISION

**AFFIDAVIT**

Comes Affiant herein, affirming under oath that the following statements are true and correct  
to the best of my knowledge and belief:

1. Petitioner is an adult employee of the Arkansas Department of Human Services.
2. I believe the appropriate venue for this case is the Juvenile Court of Jefferson County, Arkansas because the child's

3. The juvenile(s) involved are:

Name: Tamela Boyers

DOB: 06-29-2001

SSN: 000-00-0000

4. The parents of the juvenile(s) are:

Mother: Esther Boyers

DOB: 04-02-1981

Address: 6753 E. Pine St., Pine Bluff, AR 71603

Phone: 870-541-9999 (HM)

870-541-8888 (cell)

Father: Ernest Boyers

DOB: 03-20-1978

Address: 6753 E. Pine St. Pine Bluff, AR 71603

Phone: 870-541-9999

Putative or Legal: Legal father: parents were married at the time of Tamela's birth

Ernest and Esther Boyer had the following involvement in the dependency-neglect of the juvenile(s):

Ernest sexually abused Tamela and Esther does not believe that protective actions are needed to ensure Tamela's safety.

It is recommended that family time between Tamela and her mother be supervised and that they occur outside the family home due to the alleged offender's presence in the home. It is further recommended that there be no family time or other contact between Tamela and her father due to a no-contact order issued by the Circuit Court, which prohibits the alleged offender, Ernest Boyers, from having physical contact, written contact, or telephone/electronic contact with Tamela.

5. The legally responsible party of the juvenile(s) is: Name: Ernest and Esther Boyers

Address: 6753 E. Pine St. Pine Bluff, AR 71603 Phone: 870-541-9999

The juvenile(s) has lived with her parents Ernest and Esther Boyers since birth (06-29-2001).

6. The juvenile(s) siblings are: Angelina Franklin (DOB 07-31-1999). Angelina lives with her father, Anthony Franklin (DOB 01-01-1972). They reside at 2464 Winchester, Pine Bluff, AR 71603; phone number 870-541-7637.

Angelina has been in her father's custody since she was 13 years old. She has had no contact with her mother or stepfather. Prior to moving to her father's home, she had reportedly been sexually abused by her stepfather since age two years.

7. I believe the Indian Child Welfare Act does not apply to this petition. No family member has indicated that they have Native American tribal affiliation, and no one in the family is an enrolled or registered member of an Indian Tribe.

8. I have completed a diligent search for relatives and fictive kin for the juvenile(s). The family identified maternal grandmother Shirley Owens, age 65 (DOB 10-09-1953). Ms. Owens resides at 808 Palm St. Pine Bluff, Jefferson County, Arkansas, 71603. Ms. Owens has cleared all background checks. Ms. Owens has agreed to serve as a provisional placement for Tamela. The home environment has been observed. This is a safe and nurturing environment that will adequately meet Tamela's needs.

9. The Department has no prior history with this family.

10. The Department received a report on April 6, 2017, alleging sexual abuse of Tamela Boyers by her father, Ernest Boyers. Tamela was interviewed at the Jefferson County Child Advocacy Center. She reported a progression of sexual acts for nearly as long as she could remember. Her earliest memories involved her father touching and stroking her external genitalia under her panties and nightgown. Tamela recalled that the year she started school (either kindergarten or 1st grade), he began sticking his fingers in her vagina and kissing/licking her genitals.

By the time she was nine years old, her father was having vaginal and anal intercourse with her several times a week. This behavior occurred up until the date of removal from the home. The last date of reported contact was April 4, 2017. Tamela's father has been arrested and charged with sexual abuse. He was released on bond and remains in the family home. Tamela's mother discounts her disclosure and alternates between insisting her daughter is lying or has been coached by her older half-sister.

11. D. Removal: The juvenile Tamela Boyers was removed from the physical custody of Ernest and Esther Boyers and the legal custody of Ernest and Esther Boyers on April 6, 2017, at 4:45 pm because the circumstances or conditions of Ernest and Esther Boyers presented an immediate danger to the health or physical well-being of the juvenile. The following safety threats were identified and considered in the decision to remove the juvenile:

- Child sexual abuse is suspected, and circumstances suggest that the child's safety may be of immediate concern. (Ernest Boyers)
- Caregiver is aware of the potential harm and is unwilling to protect the child from actual or threatened harm by others (Esther Boyers)

Child sexual abuse is suspected, and circumstances suggest that safety is an immediate concern. The alleged offender is in the home, there is a no-contact order, and the non-offending parent has allegedly refused to protect the juvenile from harm.

An emergency existed and services could not be provided to prevent removal because the alleged offender is in the home and the other parent does not believe that protective actions are needed.

12. The juvenile's health and safety are in danger due to the allegations. Given the facts of the situation and the history of this family, the juvenile should remain in the custody of Arkansas Department of Human Services pending further hearings on this matter.

13. The Department reserves the right to present additional evidence of dependency/neglect to the Court, which may become known to it through further investigation.

Further Affiant sayeth not.

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Affiant,  
(Your Name), Family Service Worker

**VERIFICATION**

On this day, the above Affiant came before me, stating on oath that the facts contained in the foregoing affidavit and petition are true and correct to the best of the petitioner's knowledge, information, and belief.

State of Arkansas, County of \_\_\_\_\_. Subscribed and Sworn to me on  
this \_\_\_\_ day of \_\_\_\_\_, 2017.

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NOTARY PUBLIC ARKANSAS

MY COMMISSION EXPIRES:

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