**Closing Argument**

For more than half of [CHILD]’s life, [HE/SHE] has been thriving in the care of [PETITIONER]. She has provided [CHILD] with everything [HE/SHE] needs to develop into a healthy, well-rounded young [MAN/WOMAN], and she loves [HIM/HER] as if [HE/SHE] were her own child. This court has heard ample evidence today, from [PETITIONER] herself and the social worker assigned to [CHILD]’s case, that [PETITIONER] is able to provide the kind of permanent home that [CHILD] deserves: one where [HE/SHE] is safe and loved, and where everyone is committed to ensuring [HIS/HER] continued growth and development.

This Court also heard evidence today that [CHILD]’s birth mother, [BIRTH MOTHER], has consistently **failed** to provide a safe and stable home for [CHILD]. Soon after [CHILD] was born, [BIRTH MOTHER] was arrested, and from that point on, [BIRTH MOTHER] played less and less of a role in [CHILD]’s life. She allowed her ex-boyfriend, [PUTATIVE BIRTH FATHER], a known PCP user, to act as [CHILD]’s primary caregiver, and when [CHILD] was removed from his care because of his drug use, [BIRTH MOTHER] was still unable and unwilling to care for or provide for [CHILD].

The Court also heard evidence that despite this court’s orders, [BIRTH MOTHER] has not taken the necessary steps to address her mental health issues. She has been unable to secure permanent housing for herself, she has not held a consistent job for any length of time and she has not attended parenting classes as recommended by her social worker. The evidence today also showed that even when this court provided [BIRTH MOTHER] with the opportunity to have supervised visits with [CHILD], she missed many of the visits, hindering her ability to build a relationship with [HIM/HER]. Given all of the evidence presented to the Court today, [BIRTH MOTHER]’s failure to make [CHILD] a priority in her life and address her shortcomings as a parent should no longer prevent permanency for [CHILD].

As this court has heard today, [PETITIONER] wants to adopt [CHILD] and provide [HIM/HER] with the loving and supportive home that [HE/SHE] deserves. The evidence presented today clearly shows that [PETITIONER] is fit and able to give [CHILD] a proper home and everything else [HE/SHE] needs to continue thriving.

The court must weigh the relevant factors listed under D.C. Code § 16-2353 (b) when deciding whether it is in [CHILD]’s best interests to terminate [BIRTH MOTHER]’s parental rights and all five factors weigh in favor of [PETITIONER].

1. First, the court must consider the child’s need for continuity of care and caretakers and for timely integration into a stable and permanent home, taking into account the differences in the development and the concept of time of children of different ages.

* 1. [CHILD] is almost [AGE] years old, and [HE/SHE] has lived with [PETITIONER] continuously for more than half of [HIS/HER] life. The court heard testimony that [CHILD] calls [PETITIONER] “mommy” and that they have a very close and loving parent-child bond. Most importantly, the evidence shows that [PETITIONER] is able to provide the kind of stable and supportive family environment that [CHILD] needs.

* 1. On the other hand, [BIRTH MOTHER] never cared for [CHILD] for more than a couple of weeks and despite this Court’s orders and assistance from CFSA, she has not demonstrated her ability to create a stable or permanent living situation for herself, much less for a young child or to consistently visit with [CHILD].

1. Second, the court must consider the physical, mental, and emotional health of all individuals involved to the degree that such affects the welfare of the child, the decisive consideration being the physical, mental and emotional needs of the child.

* 1. It is clear from the evidence today that [BIRTH MOTHER] has significant mental and emotional issues that she has not fully addressed. [BIRTH MOTHER] has not consistently attended therapy and she has not been compliant with her medication management. [BIRTH MOTHER] has had ample time to address these issues, but she has failed to do so, and as such, she is incapable of providing a stable home and the necessary emotional support for young [CHILD].

* 1. In contrast, [PETITIONER] is in good physical, mental, and emotional health.  [PETITIONER] has already demonstrated that she is capable of meeting [CHILD]’s physical, mental, and emotional needs. She has enrolled [HIM/HER] in a special school to address [HIS/HER] delayed speech, and she takes [HIM/HER] to all of his doctor and dentist appointments.

1. Third, this court must also consider the quality of interaction and interrelationship of the child with [HIS/HER] parent, siblings, relative, and/or caretakers.

* 1. The testimony today showed that [BIRTH MOTHER] has not availed herself of the opportunities provided by this Court to have supervised visitation with [CHILD] – to establish and maintain a relationship with [HIM/HER].
  2. But this court **has** heard significant testimony about the loving bond between [PETITIONER] and [CHILD]. They spend quality mother-child time together, and [PETITIONER]’s extended family, including her parents, also have good relationships with [CHILD]. [PETITIONER]’s niece resides in the home and is like a sister to [CHILD]. The court heard testimony from [PETITIONER] that her family fully supports her decision to adopt [CHILD], and they consider [HIM/HER] to be a member of the family.

1. Lastly, this court should consider the opinion of the child as to where [HE/SHE] should live, to the extent feasible.
   1. Although [CHILD] is not quite [AGE] years old, and too young to testify, the court has heard ample evidence today that [CHILD] loves [PETITIONER] and is happy, content, and thriving in her care.

Finally, the court should find that [ACTUAL BIRTH FATHER], [CHILD]’s birth father, has abandoned [HIM/HER]. The court heard evidence today that [CHILD]’s biological father, [ACTUAL BIRTH FATHER], has never been involved [CHILD]’s life. He has never come forward, never contacted anyone or offered support for [CHILD], even after notice was posted as ordered by this court, and therefore he has abandoned [CHILD].

[CHILD] deserves a permanent home with a family who can provide a stable and nurturing environment for [HIM/HER]. [CHILD] has been in foster care for over two years, and in that time, [HE/SHE] has bonded with [PETITIONER]. [PETITIONER] loves [CHILD] as if [HE/SHE] was her own [SON/DAUGHTER], and she is committed to ensuring that [HE/SHE] has a bright future.

For all of these reasons, the court should find that it is in [CHILD]’s best interests to terminate [BIRTH MOTHER] and [ACTUAL BIRTH FATHER]’s parental rights pursuant to DC Code § 16-2353, waive their consent to [PETITIONER]’s adoption pursuant § 16-304 (d) and (e), and grant [PETITIONER]’s petition to adopt [CHILD].