



IN THE CIRCUIT COURT OF JEFFERSON COUNTY

ETHANLYNN STEWART,)
as Personal Representative of the)
Estate of KE'TORRIUS STARKES, JR.,)
a deceased minor,)

Plaintiff,)

v.)

KELA STANFORD;)
COVENANT SERVICES, INC.;)
RODERICK HENDERSON;)
DANNY WILLIAMS;)
ROSHUNDA SPENCER;)
TONEY HUNTER;)
CARLA EMMONS;)
CARLETHA McKINSTRY;)
LATOYA KINE;)

CIVIL ACTION CASE NO.:
CV-2025-_____

DEFENDANT A, the correct designation of the person or entity known as KELA STANFORD;

DEFENDANT B, the correct designation of the person or entity known as COVENANT SERVICES, INC.

DEFENDANT C, the correct designation of the person or entity known as RODERICK HENDERSON;

DEFENDANT D, the correct designation of the person or entity known as DANNY WILLIAMS;

DEFENDANT E, the correct designation of the person or entity known as ROSHUNDA SPENCER;

DEFENDANT F, the correct designation of the person or entity known as TONEY HUNTER;

DEFENDANT G, the correct designation of the person or entity known as CARLA EMMONS;

DEFENDANT H, the correct designation of the person or entity known as CARLETHA McKINSTRY;

DEFENDANT I, the correct designation of the person or entity known as LATOYA KINE;

DEFENDANTS J and K, the correct designation of the person or entity whose acts or omissions violated specific laws, rules, and/or regulations of the State of Alabama enacted or promulgated for the purpose of regulating the activities of the Jefferson County Department of Human Resources, proximately causing the wrongful death of Ke'Torrius Starkes, Jr.;

DEFENDANTS L, M, and N, the correct designation of the person or entity who acted wantonly, recklessly, and beyond his authority, or under mistaken interpretation of law, proximately causing the wrongful death of Ke’Torrius Starkes, Jr.;

DEFENDANTS O, P, and Q, the correct designation of the employees of the Jefferson County Department of Human Resources that breached the mandatory duty owed to three-year-old Ke’Torrius Starkes, Jr. by placing him in an unsafe environment, allowing him to remain in an unsafe environment, and exposing him to ongoing abuse and/or neglect which proximately caused his death; and

DEFENDANTS R, S, and T, the correct designation of the employees of the State of Alabama Department of Human Resources that breached the mandatory duty owed to three-year-old Ke’Torrius Starkes, Jr. by placing him in an unsafe environment, allowing him to remain in an unsafe environment, and exposing him to ongoing abuse and/or neglect which proximately caused his death; and

DEFENDANTS U, V, and W, the correct designation of the employees of the State of Alabama Department of Human Resources who committed acts or omissions which violated specific laws, rules and/or regulations of the State of Alabama that were enacted or promulgated for the purpose of regulating the activities of the State of Alabama Department of Human Resources, proximately causing the death of Ke’Torrius Starkes, Jr.;

DEFENDANTS X, Y, and Z, the correct designation those employees and/or representatives of the State of Alabama Department of Human Resources who acted negligently, willfully, maliciously, fraudulently, in bad faith and/or beyond their authority, or under a mistaken interpretation of law, proximately causing the death of Ke’Torrius Starkes, Jr.;

DEFENDANTS AA, BB, and CC, the correct designation of the person or entity whose negligence and other wrongful conduct proximately caused or contributed to cause the wrongful death of Ke’Torrius Starkes, Jr., whose true and correct names are unknown to the Plaintiff at this time, and will be added by amendment when ascertained;

Defendants.)
)

COMPLAINT

STATEMENT OF THE PARTIES

1. Plaintiff ETHANLYNN STEWART is over the age of nineteen (19) years and is a resident of Jefferson County, Alabama. She brings this civil action pursuant to Ala. Code § 6-5-410 as Personal Representative of the Estate of her deceased minor child, Ke’Torrius Starkes, Jr., who died as a result of the negligence and/or wantonness of the Defendants. At all times regarding the allegations in this Complaint, Plaintiff lived in Jefferson County, Alabama.
2. Plaintiff’s Decedent KE’TORRIUS STARKES, JR. was born on February 22, 2022, and was three years old at the time of his death on July 22, 2025.

3. Defendant KELA STANFORD is over the age of nineteen (19) years and is a resident of the State of Alabama. At all times relevant hereto, Ms. Stanford was the worker employed by Covenant Services, Inc. and is being sued in her individual capacity.
4. Defendant COVENANT SERVICES, INC. is a corporation doing business in the State of Alabama and who was contracted by the Alabama Department of Human Resources and/or the Jefferson County Department of Human Resources to provide transportation for children who are in state custody, temporary relative placement, and foster care throughout the state of Alabama and surrounding states.
5. Defendant RODERICK HENDERSON is over the age of nineteen (19) years and is a resident of the State of Alabama. At all times relevant hereto, Mr. Henderson was the Executive Director of Covenant Services, Inc. and is being sued in his individual capacity.
6. Defendant DANNY WILLIAMS is over the age of nineteen (19) years and is a resident of the State of Alabama. At all times relevant hereto, Mr. Williams was the Director of the Jefferson County Department of Human Resources and is being sued in his individual capacity.
7. Defendant ROSHUNDA SPENCER is over the age of nineteen (19) years and is a resident of the State of Alabama. At all times relevant, Ms. Spencer was the Assistant Director of Child Abuse/Neglect of the Jefferson County Department of Human Resources and is being sued in her individual capacity.
8. Defendant TONEY HUNTER is over the age of nineteen (19) years and is a resident of the State of Alabama. At all times relevant, Mr. Hunter was the Assistant Director of the Bessemer Region of the Jefferson County Department of Human Resources and is being sued in his individual capacity.
9. Defendant CARLA EMMONS is over the age of nineteen (19) years and is a resident of the State of Alabama. At all times relevant, Ms. Emmons was the Assistant Director of Foster Care of the Jefferson County Department of Human Resources and is being sued in her individual capacity.
10. Defendant CARLETHA McKINSTRY is over the age of nineteen (19) years and is a resident of the State of Alabama. At all times relevant, Ms. McKinstry was a worker employed with the Alabama Department of Human Resources and/or Jefferson County Department of Human Resources and is being sued in her individual capacity.
11. Defendant LATOYA KINE is over the age of nineteen (19) years and is a resident of the State of Alabama. At all times relevant, Ms. Kine was a worker employed with the Alabama Department of Human Resources and/or Jefferson County Department of Human Resources and is being sued in her individual capacity.
12. DEFENDANT A, the correct designation of the person or entity known as KELA STANFORD;
13. DEFENDANT B, the correct designation of the person or entity known as COVENANT SERVICES, INC.;

14. DEFENDANT C, the correct designation of the person or entity known as RODERICK HENDERSON;
15. DEFENDANT D, the correct designation of the person or entity known as DANNY WILLIAMS;
16. DEFENDANT E, the correct designation of the person or entity known as ROSHUNDA SPENCER;
17. DEFENDANT F, the correct designation of the person or entity known as TONEY HUNTER;
18. DEFENDANT G, the correct designation of the person or entity known as CARLA EMMONS;
19. DEFENDANT H, the correct designation of the person or entity known as CARLETHA McKINSTRY;
20. DEFENDANT I, the correct designation of the person or entity known as LATOYA KINE;
21. DEFENDANTS J and K, the correct designation of the person or entity whose acts or omissions violated specific laws, rules, and/or regulations of the State of Alabama enacted or promulgated for the purpose of regulating the activities of the Jefferson County Department of Human Resources, proximately causing the wrongful death of Ke'Torrius Starkes, Jr.;
22. DEFENDANTS L, M, and N, the correct designation of the person or entity who acted wantonly, recklessly, and beyond his authority, or under mistaken interpretation of law, proximately causing the wrongful death of Ke'Torrius Starkes, Jr.;
23. DEFENDANTS O, P, and Q, the correct designation of the employees of the Jefferson County Department of Human Resources that breached the mandatory duty owed to three-year-old Ke'Torrius Starkes, Jr. by placing him in an unsafe environment, allowing him to remain in an unsafe environment, and exposing him to ongoing abuse and/or neglect which proximately caused his death; and
24. DEFENDANTS R, S, and T, the correct designation of the employees of the State of Alabama Department of Human Resources that breached the mandatory duty owed to three-year-old Ke'Torrius Starkes, Jr. by placing him in an unsafe environment, allowing him to remain in an unsafe environment, and exposing him to ongoing abuse and/or neglect which proximately caused his death; and
25. DEFENDANTS U, V, and W, the correct designation of the employees of the State of Alabama Department of Human Resources who committed acts or omissions which violated specific laws, rules and/or regulations of the State of Alabama that were enacted or promulgated for the purpose of regulating the activities of the State of Alabama Department of Human Resources, proximately causing the death of Ke'Torrius Starkes, Jr.;
26. DEFENDANTS X, Y, and Z, the correct designation those employees and/or representatives of the State of Alabama Department of Human Resources who acted

negligently, willfully, maliciously, fraudulently, in bad faith and/or beyond their authority, or under a mistaken interpretation of law, proximately causing the death of Ke'Torrius Starkes, Jr.;

27. DEFENDANTS AA, BB, and CC, the correct designation of the person or entity whose negligence and other wrongful conduct proximately caused or contributed to cause the wrongful death of Ke'Torrius Starkes, Jr., whose true and correct names are unknown to the Plaintiff at this time, and will be added by amendment when ascertained;
28. The events giving rise to this suit occurred in Jefferson County, Alabama.

STATEMENT OF FACTS

29. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
30. On or about July 22, 2025, three-year-old KE'TORRIUS STARKES, JR. ("K.J.") who was in the custody of the Alabama Department of Human Resources and/or the Jefferson County Department of Resources ("DHR") was picked up from daycare at approximately 9:00 a.m. by Defendant KELA STANFORD, a worker employed through Defendant COVENANT SERVICES, INC., for a supervised visit with his father at the Bessemer Department of Human Resources.
31. K.J.'s visit with his father ended around 11:30 a.m. and, rather than properly returning K.J. to daycare, Defendant KELA STANFORD, performed numerous personal errands with K.J. buckled in a car seat in the back of her car.
32. Defendant KELA STANFORD stopped to pick up food for her family and then delivered the food to her home while leaving K.J. in her vehicle.
33. Defendant KELA STANFORD then left her home to go shop at a tobacco store along with K.J. still in the car.
34. Defendant KELA STANFORD returned to her home around 12:30 p.m., again leaving K.J. strapped inside the vehicle, with all windows up, and the car engine turned off.
35. Three-year-old K.J. remained trapped in Defendant KELA STANFORD's parked vehicle in her driveway for more than five (5) hours.
36. Defendant KELA STANFORD's vehicle was equipped with dark black tinted windows in violation of Alabama law.
37. On July 22, 2025, the National Weather Service in Birmingham, Alabama issued a Heat Advisory reporting temperatures over 95 degrees with a heat index range of 105 to 109 degrees.
38. During the more than five (5) hours that K.J. was missing from his daycare, the Defendants did not inquire about K.J.'s whereabouts.

39. Around 5:30 p.m., Defendant KELA STANFORD received a call asking why K.J. had not been returned to daycare after the supervised visit with his father that morning.
40. Defendant KELA STANFORD then realized she left K.J. in her hot vehicle with the windows rolled up and the engine off for over five (5) hours while she was inside her residence, just feet away.
41. Defendant KELA STANFORD went outside to her vehicle where she found K.J. unresponsive inside her scorching hot vehicle.
42. Three-year-old Ke'Torrius Starkes, Jr. was pronounced dead at 6:03 p.m. on July 22, 2025.
43. The Defendants had a mandatory duty to provide reasonably safe transportation for children who are in state custody, temporary relative placement, and foster care throughout the state of Alabama and surrounding states, including KE'TORRIUS STARKES, JR., the Plaintiff's decedent.
44. The Defendants had a mandatory duty, pursuant to the Rules and Regulations of the Alabama Department of Human Resources, the Jefferson County Department of Human Resources, and the laws of the State of Alabama, to protect K.J. from abuse and/or neglect.
45. The Defendants breached their mandatory duty owed to K.J. by allowing him to remain in an "unsafe environment" exposed to ongoing abuse and/or neglect, which proximately caused his death.
46. The conduct, acts, and/or omissions by Defendants and Fictitious Defendants were negligent, wanton, willful, malicious, fraudulent, in bad faith, beyond their authority and/or under a mistaken interpretation of the law.
47. The wrongful death of Plaintiff's decedent, KE'TORRIUS STARKES, JR., was proximately caused by the Defendants' wrongful acts, omissions, negligence and wanton conduct described herein.

COUNT I - WRONGFUL DEATH
AGAINST DEFENDANT KELA STANFORD

48. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
49. On or about July 22, 2025, three-year-old KE'TORRIUS STARKES, JR. ("K.J.") who was in the custody of the Alabama Department of Human Resources and/or the Jefferson County Department of Resources ("DHR") was picked up from daycare at 9:00 a.m. by Defendant KELA STANFORD, a worker employed through Defendant COVENANT SERVICES, INC., for a supervised visit with his father at the Bessemer Department of Human Resources. K.J.'s visit with his father ended around 11:30 a.m. and, rather than properly returning K.J. to daycare, Defendant KELA STANFORD, performed numerous personal errands with K.J. buckled in a car seat in the back of her car. Defendant KELA STANFORD stopped to pick up food for her family and then delivered the food to her

home while leaving K.J. in her vehicle. Defendant KELA STANFORD then left her home to go shop at a tobacco store along with K.J. still in the car. Defendant KELA STANFORD returned to her home around 12:30 p.m., again leaving K.J. strapped inside the vehicle, with all windows up, and the car engine turned off. Three-year-old K.J. remained trapped in Defendant KELA STANFORD's parked vehicle in her driveway for more than five (5) hours. Defendant KELA STANFORD's vehicle was equipped with dark black tinted windows in violation of Alabama law. On July 22, 2025, the National Weather Service in Birmingham, Alabama issued a Heat Advisory reporting temperatures over 95 degrees with a heat index range of 105 to 109 degrees. During the more than five (5) hours that K.J. was missing from his daycare, the Defendants did not inquire about K.J.'s whereabouts. Around 5:30 p.m., Defendant KELA STANFORD received a call asking why K.J. had not been returned to daycare after the supervised visit with his father that morning. Defendant KELA STANFORD then realized she left K.J. in her hot vehicle with the windows rolled up and the engine off for over five (5) hours while she was inside her residence, just feet away. Defendant KELA STANFORD went outside to her vehicle where she found K.J. unresponsive inside her scorching hot vehicle. Three-year-old Ke'Torrius Starkes, Jr. was pronounced dead at 6:03 p.m. on July 22, 2025.

50. Defendant KELA STANFORD (and Fictitious Defendants) had a duty to properly provide reasonable care for Plaintiff's decedent, KE'TORRIUS STARKES, JR.
51. Defendant KELA STANFORD (and Fictitious Defendants) breached its duty owed to Plaintiff's decedent, KE'TORRIUS STARKES, JR., by negligently and/or wantonly causing the wrongful death of three-year-old, KE'TORRIUS STARKES, JR.
52. The direct and proximate cause of the death of Plaintiff's decedent, KE'TORRIUS STARKES, JR. was the negligence, recklessness, carelessness and/or wantonness of Defendant KELA STANFORD, the Defendants and Fictitious Defendants.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendant KELA STANFORD (and Fictitious Defendants) in an amount to be determined by a struck jury, plus interest and costs.

COUNT II - WRONGFUL DEATH
AGAINST DEFENDANT COVENANT SERVICES, INC.
and DEFENDANT RODERICK HENDERSON

53. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
54. Defendants COVENANT SERVICES, INC. and RODERICK HENDERSON (and Fictitious Defendants) had a duty to properly hire, train, and supervise safe and competent workers.
55. Defendants COVENANT SERVICES, INC. and RODERICK HENDERSON (and Fictitious Defendants) breached its duty owed to the public, including Plaintiff's decedent, KE'TORRIUS STARKES, JR., by negligently and/or wantonly hiring, training, supervising the Defendant KELA STANFORD, proximately causing the death of three-year-old, KE'TORRIUS STARKES, JR.

56. As a proximate consequence of said negligence and/or wantonness of Defendants COVENANT SERVICES, INC. and RODERICK HENDERSON (and Fictitious Defendants), the Plaintiff's decedent, KE'TORRIUS STARKES, JR., sustained injuries causing his wrongful death.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendants COVENANT SERVICES, INC. and RODERICK HENDERSON (and Fictitious Defendants) in an amount to be determined by a struck jury, plus interest and costs.

COUNT III - WRONGFUL DEATH
AGAINST DEFENDANT DANNY WILLIAMS

57. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
58. Plaintiff alleges that Defendant DANNY WILLIAMS and Fictitious Defendants were the employees of the Alabama Department of Human Resources and/or the Jefferson County Department of Human Resources (DHR) and charged with properly handling the child protective services and foster care case of KE'TORRIUS STARKES, JR.
59. Plaintiff alleges that as a proximate cause of Defendant DANNY WILLIAMS and Fictitious Defendants' wrongful acts, omissions, negligence and wanton conduct, KE'TORRIUS STARKES, JR., was affirmatively allowed to be placed in a position of danger that he would not have otherwise faced.
60. Plaintiff alleges that Defendant DANNY WILLIAMS and Fictitious Defendants committed acts or omissions which violated specific laws, rules, or regulations of this State enacted or promulgated for the purpose of regulating the activities of DHR, proximately causing KE'TORRIUS STARKES, JR.'s wrongful death.
61. Plaintiff alleges that Defendant DANNY WILLIAMS and Fictitious Defendants acted beyond his authority or under a mistaken interpretation of the law, proximately cause the wrongful death of KE'TORRIUS STARKES, JR.
62. Plaintiff alleges that as a proximate consequence of the aforementioned conduct of Defendant DANNY WILLIAMS and Fictitious Defendants, KE'TORRIUS STARKES, JR. was allowed to suffer abuse and/or neglect which led to his wrongful death on or about July 22, 2025.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendant DANNY WILLIAMS (and Fictitious Defendants) in an amount to be determined by a struck jury, plus interest and costs.

COUNT IV - WRONGFUL DEATH
AGAINST DEFENDANT ROSHUNDA SPENCER

63. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
64. Plaintiff alleges that Defendant ROSHUNDA SPENCER and Fictitious Defendants were the employees of the Alabama Department of Human Resources and/or the Jefferson County Department of Human Resources (DHR) and charged with properly handling the child protective services and foster care case of KE'TORRIUS STARKES, JR.
65. Plaintiff alleges that as a proximate cause of Defendant ROSHUNDA SPENCER and Fictitious Defendants' wrongful acts, omissions, negligence and wanton conduct, KE'TORRIUS STARKES, JR., was affirmatively allowed to be placed in a position of danger that he would not have otherwise faced.
66. Plaintiff alleges that Defendant ROSHUNDA SPENCER and Fictitious Defendants committed acts or omissions which violated specific laws, rules, or regulations of this State enacted or promulgated for the purpose of regulating the activities of DHR, proximately causing KE'TORRIUS STARKES, JR.'s wrongful death.
67. Plaintiff alleges that Defendant ROSHUNDA SPENCER and Fictitious Defendants acted beyond his authority or under a mistaken interpretation of the law, proximately cause the wrongful death of KE'TORRIUS STARKES, JR.
68. Plaintiff alleges that as a proximate consequence of the aforementioned conduct of Defendant ROSHUNDA SPENCER and Fictitious Defendants, KE'TORRIUS STARKES, JR. was allowed to suffer abuse and/or neglect which led to his wrongful death on or about July 22, 2025.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendant ROSHUNDA SPENCER (and Fictitious Defendants) in an amount to be determined by a struck jury, plus interest and costs.

COUNT V - WRONGFUL DEATH
AGAINST DEFENDANT TONEY HUNTER

69. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
70. Plaintiff alleges that Defendant TONEY HUNTER and Fictitious Defendants were the employees of the Alabama Department of Human Resources and/or the Jefferson County Department of Human Resources (DHR) and charged with properly handling the child protective services and foster care case of KE'TORRIUS STARKES, JR.
71. Plaintiff alleges that as a proximate cause of Defendant TONEY HUNTER and Fictitious Defendants' wrongful acts, omissions, negligence and wanton conduct, KE'TORRIUS STARKES, JR., was affirmatively allowed to be placed in a position of danger that he would not have otherwise faced.

72. Plaintiff alleges that Defendant TONEY HUNTER and Fictitious Defendants committed acts or omissions which violated specific laws, rules, or regulations of this State enacted or promulgated for the purpose of regulating the activities of DHR, proximately causing KE'TORRIUS STARKES, JR.'s wrongful death.
73. Plaintiff alleges that Defendant TONEY HUNTER and Fictitious Defendants acted beyond his authority or under a mistaken interpretation of the law, proximately cause the wrongful death of KE'TORRIUS STARKES, JR.
74. Plaintiff alleges that as a proximate consequence of the aforementioned conduct of Defendant TONEY HUNTER and Fictitious Defendants, KE'TORRIUS STARKES, JR. was allowed to suffer abuse and/or neglect which led to his wrongful death on or about July 22, 2025.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendant TONEY HUNTER (and Fictitious Defendants) in an amount to be determined by a struck jury, plus interest and costs.

COUNT VI - WRONGFUL DEATH
AGAINST DEFENDANT CARLA EMMONS

75. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
76. Plaintiff alleges that Defendant CARLA EMMONS and Fictitious Defendants were the employees of the Alabama Department of Human Resources and/or the Jefferson County Department of Human Resources (DHR) and charged with properly handling the child protectives services and foster care case of KE'TORRIUS STARKES, JR.
77. Plaintiff alleges that as a proximate cause of Defendant CARLA EMMONS and Fictitious Defendants' wrongful acts, omissions, negligence and wanton conduct, KE'TORRIUS STARKES, JR., was affirmatively allowed to be placed in a position of danger that he would not have otherwise faced.
78. Plaintiff alleges that Defendant CARLA EMMONS and Fictitious Defendants committed acts or omissions which violated specific laws, rules, or regulations of this State enacted or promulgated for the purpose of regulating the activities of DHR, proximately causing KE'TORRIUS STARKES, JR.'s wrongful death.
79. Plaintiff alleges that Defendant CARLA EMMONS and Fictitious Defendants acted beyond his authority or under a mistaken interpretation of the law, proximately cause the wrongful death of KE'TORRIUS STARKES, JR.
80. Plaintiff alleges that as a proximate consequence of the aforementioned conduct of Defendant CARLA EMMONS and Fictitious Defendants, KE'TORRIUS STARKES, JR. was allowed to suffer abuse and/or neglect which led to his wrongful death on or about July 22, 2025.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendant CARLA EMMONS (and Fictitious Defendants) in an amount to be determined by a struck jury, plus interest and costs.

COUNT VII - WRONGFUL DEATH
AGAINST DEFENDANT CARLETHA McKINSTRY

81. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
82. Plaintiff alleges that Defendant CARLETHA McKINSTRY and Fictitious Defendants were the employees of the Alabama Department of Human Resources and/or the Jefferson County Department of Human Resources (DHR) and charged with properly handling the child protectives services and foster care case of KE'TORRIUS STARKES, JR.
83. Plaintiff alleges that as a proximate cause of Defendant CARLETHA McKINSTRY and Fictitious Defendants' wrongful acts, omissions, negligence and wanton conduct, KE'TORRIUS STARKES, JR., was affirmatively allowed to be placed in a position of danger that he would not have otherwise faced.
84. Plaintiff alleges that Defendant CARLETHA McKINSTRY and Fictitious Defendants committed acts or omissions which violated specific laws, rules, or regulations of this State enacted or promulgated for the purpose of regulating the activities of DHR, proximately causing KE'TORRIUS STARKES, JR.'s wrongful death.
85. Plaintiff alleges that Defendant CARLETHA McKINSTRY and Fictitious Defendants acted beyond his authority or under a mistaken interpretation of the law, proximately cause the wrongful death of KE'TORRIUS STARKES, JR.
86. Plaintiff alleges that as a proximate consequence of the aforementioned conduct of Defendant CARLETHA McKINSTRY and Fictitious Defendants, KE'TORRIUS STARKES, JR. was allowed to suffer abuse and/or neglect which led to his wrongful death on or about July 22, 2025.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendant CARLETHA McKINSTRY (and Fictitious Defendants) in an amount to be determined by a struck jury, plus interest and costs.

COUNT VIII - WRONGFUL DEATH
AGAINST DEFENDANT LATOYA KINE

87. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
88. Plaintiff alleges that Defendant LATOYA KINE and Fictitious Defendants were the employees of the Alabama Department of Human Resources and/or the Jefferson County Department of Human Resources (DHR) and charged with properly handling the child protectives services and foster care case of KE'TORRIUS STARKES, JR.

89. Plaintiff alleges that as a proximate cause of Defendant LATOYA KINE and Fictitious Defendants' wrongful acts, omissions, negligence and wanton conduct, KE'TORRIUS STARKES, JR., was affirmatively allowed to be placed in a position of danger that he would not have otherwise faced.
90. Plaintiff alleges that Defendant LATOYA KINE and Fictitious Defendants committed acts or omissions which violated specific laws, rules, or regulations of this State enacted or promulgated for the purpose of regulating the activities of DHR, proximately causing KE'TORRIUS STARKES, JR.'s wrongful death.
91. Plaintiff alleges that Defendant LATOYA KINE and Fictitious Defendants acted beyond his authority or under a mistaken interpretation of the law, proximately cause the wrongful death of KE'TORRIUS STARKES, JR.
92. Plaintiff alleges that as a proximate consequence of the aforementioned conduct of Defendant LATOYA KINE and Fictitious Defendants, KE'TORRIUS STARKES, JR. was allowed to suffer abuse and/or neglect which led to his wrongful death on or about July 22, 2025.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendant LATOYA KINE (and Fictitious Defendants) in an amount to be determined by a struck jury, plus interest and costs.

COUNT IX – COMBINED AND CONCURRENT NEGLIGENCE

93. Plaintiff hereby adopts and incorporates by reference each and every allegation set forth above.
94. This cause of action is brought against Defendants KELA STANFORD, COVENANT SERVICES, INC., RODERICK HENDERSON, DANNY WILLIAMS, ROSHUNDA SPENCER, TONEY HUNTER, CARLA EMMONS, CARLETHA McKINSTRY, LATOYA KINE and Fictitious Defendants.
95. As a direct and proximate result of the combining and concurrent conduct of all of these Defendants, the Plaintiff's decedent, KE'TORRIUS STARKES, JR. sustained a wrongful death.

WHEREFORE, Plaintiff Ethanlynn Stewart, as Personal Representative of the Estate of Ke'Torrius Starkes, Jr., demands punitive damages against Defendants KELA STANFORD, COVENANT SERVICES, INC., RODERICK HENDERSON, DANNY WILLIAMS, ROSHUNDA SPENCER, TONEY HUNTER, CARLA EMMONS, CARLETHA McKINSTRY, LATOYA KINE and Fictitious Defendants in an amount to be determined by a struck jury, plus interest and costs.

Respectfully submitted,

/s/ G. Courtney French

G. COURTNEY FRENCH
MICHAEL D. PETWAY
SAMUEL K. FORD
TYERRA M. HENDERSON

OF COUNSEL:

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PLEASE SERVE DEFENDANTS BY PRIVATE PROCESS SERVER:

KELA STANFORD
1533 Pine Tree Drive
Birmingham, AL 35235

COVENANT SERVICES, INC.
c/o Roderick Henderson
3805 Rice Avenue
Anniston, AL 36206

RODERICK HENDERSON
3805 Rice Avenue
Anniston, AL 36206

DANNY WILLIAMS
417 Tavel Road
Warrior, AL 35180

ROSHUNDA SPENCER
4566 Brookshire Loop
Bessemer, AL 35022

TONEY HUNTER
101 Annie Lane
Pleasant Grove, AL 35127

CARLA EMMONS
1201 Pinedale Road
Clanton, AL 35045

CARLETHA McKINSTRY
2223 River Haven Lane
Hoover, AL 35244

LATOYA KINE
1611 Kincheon Road
Clanton, AL 35045