

MANUELA HERNANDEZ

Petitioner

EIGHTH JUDICIAL DISTRICT COURT
JUDGE; THE HONORABLE ROBERT W.
TEUTON, DISTRICT COURT JUDGE,

Real Party in Interest.

Clerk of Supreme Court

1
2 IN THE SUPREME COURT OF THE STATE OF NEVADA

3 MANUELA HERNANDEZ

4 Petitioner

5 vs.

6 EIGHTH JUDICIAL DISTRICT COURT
7 JUDGE; THE HONORABLE ROBERT W.
8 TEUTON, DISTRICT COURT JUDGE,

9 Respondents,

10 and

11 THE STATE OF NEVADA

12 Real Party in Interest.

Case No. 65939

District Court No. J-14-332774-U1

13
14 STATE OF NEVADA'S, REAL PARTY IN INTEREST, ANSWER TO THE
15 PETITIONER'S WRIT OF MANDAMUS OR, IN THE ALTERNATIVE,
16 WRIT OF PROHIBITION

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Counsel for Natural Mother

26 COMES NOW the State of Nevada, Real Party in Interest, hereby responds to
27 the Petition for Writ of Mandamus in the above-referenced matter in compliance with
28 the Court's Order.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2

3 **I. STATEMENT OF ISSUES**

- 4
- 5 1. NRSB.570 provides Petitioner with a plain, speedy and adequate remedy in the
- 6 ordinary course of law, and therefore the instant Writ is not appropriately
- 7 before the Court;
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- 9 2. The Case Plan comports with NRS 432B.540 which mandates that the “plan”
- 10 must be designed to achieve a safe placement of the child and that the plan
- 11 must include without limitation, a description of the services that will facilitate
- 12 the return of the child to the custody of the parent or to ensure permanent
- 13 placement of the child;
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- 15 3. The District Court is further vested with ability to order the child, parent, or
- 16 guardian to undergo treatment or other care that the court considers to be in the
- 17 best interest of the child pursuant to NRS 432B.560, and therefore requiring
- 18 Petitioner to undergo a drug test if she is found by the Department of Family
- 19 Services (hereinafter, “DFS”), to be slurring her speech and/or exhibiting other
- 20 outward signs of being under the influence is not unreasonable and a violation
- 21 of the Fourth Amendment.
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II. STATEMENT OF THE CASE

Minors A.H. and K.H. were removed from Petitioner's care on or about February 4, 2014 because K.H. presented at the Sunrise Children's Hospital exhibiting bruising to the cheeks, swelling to the left cheek, diffuse bruising to the entire forehead, bruising to the inside of the pinna,¹ inner lip contusion, and bruising to the dorsal foot. (Appellant's Appendix, hereinafter "AA," pages 000004-5). Dr. Cetl noted that K.H.'s bruising to the face, forehead, and ears were too numerous and diffused to count. (AA, p. 000005). K.H. was merely two years old at the time the injuries were discovered. (AA, p. 000004).

K.H. came to the attention of DFS because the babysitter sought medical intervention for the two year old child, (AA, p. 000002, lines 9-15); Petitioner did not seek medical care for K.H. because she claimed she was working. (AA, p. 000002). Petitioner then claimed that the bruising was the result of an accident. *Id.* On or about February 19, 2014, an abuse and neglect petition was filed against Petitioner and her boyfriend, Jonathan Balderas, (AA, p. 000004-6).

Petitioner Admitted to the Amended Petition on or about March 13, 2014 which was filed on March 26, 2014. (A.A., p. 000008-10). Petitioner Admitted that she left the minors in the care of Jonathan Balderas even though she saw and/or knew that he

¹ The ear.

1 slapped K.H. twice in the face on or about January 3, 2014. Jonathan Balderas
2 proceeded to trial and was found to have abused K.H. resulting in the injuries as
3 alleged in Petition number 1.
4

5 Amended Petition was found to be true as to Petitioner and Jonathan Balderas
6 and the case plan was submitted to the district court for approval on March 31, 2014.
7 The case plan proposed that Petitioner attend physical abuse assessment, domestic
8 violence classes, cooperation with DFS, and randomly drug testing based on her
9 diminished protective capacity and being around people who are using drugs. (AA, p.
10 000041-43, and 0000028-29). Petitioner's counsel opposed the random drug testing
11 because Petitioner tested clean. (AA, p. 00027, lines 17-18). The district court
12 modified the case plan and deleted the random testing, but permitted DFS to test
13 Petitioner if there was reasonable belief that Petitioner was under the influence of
14 non-prescribed drugs. (AA, p. 00028-29). The court further provided guidance of
15 reasonable belief to include slurred speech or otherwise exhibiting that she is under
16 the influence. (AA, p. 00029, lines 15-22). The court found that requiring a warrant
17 for a drug test was unnecessary and that reasonable belief and court order would
18 suffice. (AA, p. 000028, line 23-24 and 00029, lines 1-2, and 20-22).
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24 The Court: First of all, he's not gonna be able to call her up and say you've got
25 twenty-four hours to submit to a test. That's pretty intrusive given the facts
26 here. If he's meeting with her and she's got slurred speech or she's otherwise
27 exhibiting that she's under the influence of some controlled substance, I'm not
28 gonna require him to go get a warrant. That's good enough for me to say,
submit to a drug test. (AA, 00029, lines 15-22).

1 In approving drug testing if there is reasonable belief that Petitioner is under the
2 influence, the court noted that Petitioner already lacked protective capacity that she
3 would otherwise possess. (AA, p. 000029, lines 4-5).
4

5 6 7 **III. ARGUMENT**

8 **A. Extraordinary Relief is Unwarranted in the Instant Matter Because** 9 **Petitioner Failed to Seek the Clear and Ready Remedy Available** 10 **under NRS 432B.570.**

11 Mandamus is an extraordinary remedy and the decision whether the petition
12 will be granted lies with the discretion of the Court.² Mandamus may be issued “to
13 compel the performance of an act which the law especially enjoins as a duty resulting
14 from an office, trust or station; or to compel the admission of a party to the use and
15 enjoyment of a right or office to which he is entitled and from which he is entitled and
16 from which he is unlawfully precluded by such inferior tribunal.”³ Writs are an
17 extraordinary remedy and appropriate for consideration by this Court when there is no
18 “plain, speedy adequate remedy, in the ordinary course of law.”⁴ The Court may also
19 grant relief where there is an important issue of law requiring clarification.⁵
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25 ² Poulos v. Dist. Court, 98 Nev. 453, 455, 652 P.2d 1177, 1178 (1982); Kussman v. Dist. Court, 96 Nev. 544, 545, 612
26 P.2d 679 (1980).

27 ³ NRS 34.160

28 ⁴ NRS 34.020; NRS 34.170, NRS 34.330; State v. Second Judicial Dist. Court ex rel. Cnty. of Washoe, 120 Nev. 254,
258-59, 89 P.3d 663, 665-66 (2004)

⁵ State v. Second Judicial Dist. Court ex rel. Cnty. of Washoe, 120 Nev. 254, 258-59, 89 P.3d 663, 665-66 (2004)

1 Writs cannot be utilized for the purpose of reviewing the discretionary rulings
2 of the district court.⁶ Writs are only appropriate to control arbitrary or capricious
3 exercise of discretion.⁷ The writ of prohibition arrests the proceedings of a
4 tribunal...exercising judicial functions without or in excess of jurisdiction.⁸

6 Petitioner avails herself for an extraordinary remedy without first seeking the
7 plain remedy available under NRS 432B.570. NRS 432B.570 provides that a
8 custodian of the child... or a parent may move to revoke or modify an order of the
9 court issued pursuant to NRS 432B.550 or 432B.560.

11 The district court has the discretion under NRS 432B.560(1)(a) to order the
12 parent, child or guardian to undergo such treatment that the court considers to be in
13 the best interest of the child. Subsection (b)(1) also permits the court to order the
14 parent or guardian to refrain from any harmful or offensive conduct towards the child.
15 Here, the district court ordered Petitioner to abide by the case plan with the
16 modification that DFS may request that Petitioner submit to drug testing if there is
17 reason to believe she is using non-prescribed controlled substances without a warrant
18 requirement. (AA, p. 000029, lines 15-22).

22 Counsel did not move to modify or revoke the court order as provided in NRS
23 432B.570.⁹ On March 31, 2014 Petitioner did not cite to any authority abridging the
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27 ⁶ State v. Second Judicial Dist. Court ex rel. Cnty. of Washoe, 120 Nev. 254, 258-59, 89 P.3d 663, 665-66 (2004)

⁷ Marshall v. Dist. Court, 108 Nev. 459, 466, 836 P.2d 302, 303 (1964).

⁸ NRS 34.320

⁹ Counsel is aware of this remedy as she has filed a similar motion to modify court ordered case plans.

1 court's ability to order a parent to engage in services to safely reunify with the
2 children or ordering a parent to refraining from any acts in relations to the best interest
3 of the children. Rather than seeking a modification or revocation based on articulated
4 law and argument, Petitioner improperly seeks a Writ to review the court's discretion.
5 This Writ must further be denied because Petitioner failed to seek the ready and
6 appropriate remedy. Moreover, the prohibition writ must be also denied for failing to
7 seek redress through the appropriate motion under NRS 432B.570.
8

9
10 **B. The Case Plan comports with the law; it is designed to facilitate a**
11 **safe and permanent placement with Petitioner and therefore this**
12 **Writ must be denied.**
13

14 “[T]he state has a compelling interest in assuring that abused and neglected
15 children achieve safe, stable and permanent home environments within which to be
16 reared.” In re Parental Rights as to D.R.H., 120 Nev. 422, 427, 92 P.3d 1230, 1233
17 (2004). NRS 432B.540¹⁰ provides that if a child is removed from the parent, a plan
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21 ¹⁰ 432B.540. Report by agency which provides child welfare services; plan for placement of child

22 1. If the court finds that the allegations of the petition are true, it shall order that a report be made in writing by an
23 agency which provides child welfare services, concerning:

24 (a) Except as otherwise provided in paragraph (b), the conditions in the child's place of residence, the child's record in
25 school, the mental, physical and social background of the family of the child, its financial situation and other matters
26 relevant to the case; or

27 (b) If the child was delivered to a provider of emergency services pursuant to NRS 432B.630, any matters relevant to the
28 case.

29 *2. If the agency believes that it is necessary to remove the child from the physical custody of the child's parents, it
30 must submit with the report a plan designed to achieve a placement of the child in a safe setting as near to the residence
31 of the parent as is consistent with the best interests and special needs of the child. The plan must include, without
32 limitation:*

33 (a) A description of the type, safety and appropriateness of the home or institution in which the child could be placed,
34 including, without limitation, a statement that the home or institution would comply with the provisions of NRS
35 432B.3905, and a plan for ensuring that the child would receive safe and proper care and a description of the needs of
36 the child;

1 must be submitted designed to achieve a safe placement of the child consistent with
2 the *best interests* and special needs of the child. NRS 432B.540(2). The plan must
3 include *without limitation*: a description of the services to be provided to the child
4 and the parent to facilitate the return of the child to the custody of the parent or ensure
5 the permanent placement. NRS 432B.540(2)(b) (emphasis added).
6

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8 Petitioner's Counsel cites to NRS 128.0155 which applies at the termination
9 proceedings but both NRS 432B.540 and NRS 128.0155 address the case plan and its
10 goal of safe and permanent reunification.
11

12 Chapter 432B is dedicated to protection of children and every statute contained
13 therein must be construed *liberally* to be afforded its purpose and meaning. Edgington
14 v. Edgington, 119 Nev. 577, 582-83, 80 P.3d 1282, 1286-87 (2003) (emphasis added).
15

16 “[T]he construction of a statute is a question of law.” In interpreting a statute,
17 “words ... should be given their plain meaning unless this violates the spirit of
18 the act.” Thus, when a statute's language is clear and unambiguous, the apparent
19 intent must be given effect, as there is no room for construction. If, however, a
20 statute is susceptible to more than one reasonable meaning, it is ambiguous, and
21 the plain meaning rule does not apply. Instead, the legislative intent must be
22 ascertained from the statute's terms, the objectives and purpose, “ ‘in line with
23 what reason and public policy’ ” dictate. Statutory interpretation should avoid
24 meaningless or unreasonable results, and “[s]tatutes with a protective purpose
25 should be liberally construed in order to effectuate the benefits intended to be
26 obtained.” Additionally, “[w]hen construing a specific portion of a statute, the
27 statute should be read as a whole, and, where possible, the statute should be
28 read to give meaning to all of its parts.” Id.

(b) A description of the services to be provided to the child and to a parent to facilitate the return of the child to the custody of the parent or to ensure the permanent placement of the child;
(c) The appropriateness of the services to be provided under the plan; and
(d) A description of how the order of the court will be carried out.
Nev. Rev. Stat. Ann. § 432B.540 (West) (emphasis added).

1 The plain language of NRS 432B.540 mandates that if the child is removed
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3 from the home, a plan without limitation must provide services to the parent and the
4 child to ensure permanent placement. NRS 432B.560(1) also grants the district court
5 the ability to order the parent into any treatment that is in the best interest of the child.
6
7 The case plan comports with the law and the district court did not abuse its discretion
8 in ordering Petitioner to submit to drug testing if she is exhibiting signs that she is
9 under the influence of drugs.
10

11 Petitioner argues that the court cannot order her to submit to drug testing
12 because the abuse and neglect petition did not allege that she used drugs and that the
13 petition is the only basis for State's interference. (Petition for Writ of Mandamus, p.
14 8). This argument ignores the court's broad discretion in ensuring that the case plan
15 effectively achieves the goal of permanent and safe reunification pursuant to NRS
16 432B.540 and 432B.560(1)(a)(b)(1). If Petitioner's argument is permitted, DFS and
17 the court are to only look at the family's problems in a tunnel and ignore other
18 obvious problems which create barriers to the child returning home safely and
19 permanently. Petitioner's argument promotes an irrational result, that the case plan
20 can only myopically address the known problem of the parent at the time of the
21 child's removal and ignore other problems that become obvious as the case progresses
22 regardless of the safety and permanency goal. Petitioner's argument is contrary to the
23 legislative intent and plain language of the statutes.
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1 The district court was within its discretion in ordering drug tests based on
2 reasonable belief standard and this Writ must be denied because a Writ is an improper
3 vehicle to review court's discretion.
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5 **C. Petitioner's requirement that she submit to drug testing if there is**
6 **reason to believe she is under the influence of controlled substance is**
7 **reasonable and not violative of the Fourth Amendment; Petitioner's**
8 **assertion that she is required to randomly drug tests is untrue.**

9 The Fourth Amendment proscribes only unreasonable search and seizure.¹¹

10 What is reasonable, of course, "depends on all of the circumstances surrounding
11 the search or seizure and the nature of the search or seizure itself." United
12 States v. Montoya de Hernandez, 473 U.S. 531, 537, 105 S.Ct. 3304, 3308, 87
13 L.Ed.2d 381 (1985). Thus, the permissibility of a particular practice "is judged
14 by balancing its intrusion on the individual's Fourth Amendment interests
15 against its promotion of legitimate governmental interests." Delaware v.
16 Prouse, 440 U.S., at 654, 99 S.Ct., at 1396; United States v. Martinez-Fuerte,
428 U.S. 543, 96 S.Ct. 3074, 49 L.Ed.2d 1116 (1976).
17 Skinner v. Ry. Labor Executives' Ass'n, 489 U.S. 602, 619, 109 S. Ct. 1402, 1414,
103 L. Ed. 2d 639 (1989).

18 In most criminal matters, the balance may favor the need for warrants. Id.
19 However, the "special needs exception" permits departure from the warrant and
20 probable cause determination.¹² "[D]ispensing of the warrant requirement is at its
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27 ¹¹ United States v. Sharpe, 470 U.S. 675, 682, 105 S.Ct. 1568, 1573 (1985).

28 ¹² Id. at 619-620. (quoting Giffin v. Wisconsin, 483 868, 873, 107 S.Ct 3164 (1987)).

1 strongest when, as here, ‘the burden of obtaining a warrant is likely to frustrate the
2 governmental purpose behind the search.’”¹³

3 In Skinner, the Court found toxicological tests for railroad employees for the
4 purpose of public safety and not for the purpose of prosecution, justified privacy
5 intrusion *without a warrant or individualized suspicion*. (Id. at 620-621) (emphasis
6 added). The Court validated regulating railroad employees’ conduct and likened it to
7 that of supervising probationers for the purpose of public safety and that the drug tests
8 fell within the special needs exception. (Id. at 620). The Court noted that alcohol and
9 drugs are eliminated from the bloodstream at a constant rate and blood and breath
10 samples are necessary to measure the presence of substances at the time of the
11 incident. Id. The Court further found that railroad supervisors were not in the
12 business of investigating criminal violations or enforcing administrative codes and
13 imposing warrant procedures were unreasonable. Id. at 623-624.

14 The circumstances surrounding the need for testing and the nature of the test are
15 reasonable. Jonathan Balderas physically abused K.H. and Petitioner failed to protect
16 K.H. despite observing the abuse. Petitioner Admitted to the Amended Petition which
17 outlines that she knew that her boyfriend was abusing K.H. (AA, p. 000009).
18 Petitioner further failed to seek medical attention for K.H. and but for the intervention
19 of the babysitter, the abuse would have continued. The abuse would have continued
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28 ¹³ Skinner, 489 US 602 at 623.

1 without the babysitter's action because Petitioner minimized the abuse and claimed
2 that it was an accident. Petitioner lacked the protective capacity at the time of K.H.
3 and A.H.'s removal and the reasons that led to Petitioner's choices at that time are
4 unknown. No plan can immediately identify and calculate all of Petitioner's service
5 needs and a case plan must to evolve as the problems in the family that led to removal
6 become known.
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9 The court ordered Petitioner to undergo drug testing if DFS has reason to
10 believe Petitioner is under the influence so that her parenting can be addressed with a
11 sober and sound mind. The drug test is in the form of urine and/or hair and the nature
12 of the tests is not overtly invasive. The circumstances that led to a case plan
13 formation and drug testing based on reasonable belief standard does not violate the
14 Fourth Amendment.
15

16
17 The United States Supreme Court in Skinner held that drug tests to promote
18 public safety are reasonable even without a warrantless or individualized suspicion.
19
20 Petitioner is not required to undergo random drug testing without any justification as
21 she claims. DFS is permitted to drug test only if there is reason to believe that
22 Petitioner is under the influence of controlled substance, as in slurred speech or other
23 manifestation that she is under the influence of controlled substance, DFS may drug
24 test Petitioner. (AA, p. 000028-29). The drug tests are for the purpose of creating a
25 plan to safely and permanently reunify with the subject minors and not for the purpose
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1 of criminal prosecution; therefore the tests fall under the special needs exception
2 departing from the warrant requirement. A warrant requirement is onerous in the
3 instant case because as held in *Skinner*, the purpose of the test is frustrated due to the
4 elimination of drugs in the system at a constant rate.

6 Petitioner correctly asserts that arbitrary invasions solely at the unfettered
7 discretions of the officers in the field are unconstitutional. (Petitioner's Writ, p. 9-10).
8 Petitioner also correctly states that blood draws can be subject to stringent probable
9 cause requirements. *Id.* at 10. None of those factors exists here.

12 The instant matter falls soundly within the special needs exception because the
13 goal is safe return of Petitioner's children. In *Skinner*, the Court likened regulating
14 railroad employees' conduct to that of "supervision of probationers or regulated
15 industries, or its operation of a government office, school, or prison, "likewise
16 presents 'special needs' beyond normal law enforcement that may justify departures
17 from the usual warrant and probable-cause requirements." 489 U.S. at 620.

20 Petitioner is currently under the jurisdiction of the family court due to her abuse
21 and neglect of the children. Like a probationer or a person regulated due to safety
22 impact on the public, Petitioner is subject to supervision and the court's order to test
23 with reasonable suspicion. Petitioner has diminished expectation of privacy because
24 she is currently under the family court jurisdiction based on the ongoing juvenile case
25 and her case plan requirements. The case plan requires her to cooperate with DFS and
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1 permit DFS to conduct random home visits and sign releases to monitor her domestic
2 violence counseling and physical abuse/non-offending classes. (AA, p. 000041-42).

3 In balancing intrusion against the legitimate government purpose, the safety of
4 the subject minors, Petitioner's privacy intrusion is justified. The focus here is safe
5 and permanent reunification and not for the purpose of criminal prosecution.
6 Petitioner is subject to case plan requirements and the court within its discretion
7 ordered her to submit to drug testing without a warrant as long as DFS has reasonable
8 belief that she is under the influence.
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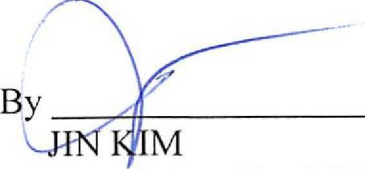
11 CONCLUSION

12
13 The State of Nevada, as a Real Party in Interest, respectfully requests that the
14 Petition Writ of Mandamus and, or Writ of Prohibition be denied as improperly before
15 this Court. Petitioner did not seek the ready and available remedy by filing a written
16 motion with points and authority as permitted pursuant to NRS 432B.570.
17 Petitioner's writ must be further denied because the district court did not abuse its
18 discretion in ordering the drug tests based on individualized suspicion and the court's
19 discretion should not be reviewed pursuant to a writ. Petitioner must further be
20 denied because the tests are reasonable under the circumstances and nature of the
21 order; reasonable suspicion drug testing given that she is under the court's jurisdiction
22 for the pending abuse and neglect case.
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1 Petitioner inexplicably stood by as her boyfriend beat K.H. She also did not
2 seek medical attention for the child and a bystander, the babysitter, had to act to
3 protect the child. The reasons for Petitioner's shortcomings are still unknown but
4 DFS must be able to address the issues as they surface and refer Petitioner for proper
5 services in order to ensure lasting permanency for the subject minors. The case plan is
6 a living document that must be permitted to evolve to address the safety and best
7 interest of the children. Based on the foregoing, Petitioner's writ must be denied.
8

9
10 Dated this 7th day of August, 2014.
11

12
13 STEVEN B. WOLFSON
14 Clark County District Attorney
15 Nevada Bar No. 1565

16 By  _____
17 JIN KIM
18 Nevada Bar No. 9603
19 Deputy District Attorney
20 Office of the Clark County District Attorney
21 Juvenile Division
22 601 N. Pecos Road
23 Las Vegas, Nevada 89101
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CERTIFICATE OF COMPLIANCE

STATE OF NEVADA)
COUNTY OF CLARK) ss:

JIN KIM, being first duly sworn, deposes and says:

I am the Deputy District Attorney acting for STEVEN B. WOLFSON, District Attorney and one of the Respondents in the above captioned petition.

I hereby certify that this brief complies with the formatting requirements of NRAP 32(a)(4), the typeface requirements of NRAP 32(a)(5) and the style requirements of NRAP 32(a)(6) because this brief has been prepared in a proportionally spaced typeface using Microsoft Word 2003 in 14 point Times New Roman.

I further certify that this brief complies with the page- or type-volume limitations of NRAP 32(a)(7) because, excluding the parts of the brief exempted by NRAP 32(a)(7)(C), it is proportionately spaced, has a type face of 14 points or more. Finally, I hereby certify that I have read this reply to writ of mandamus, and to the best of my knowledge, information, and belief, it is not frivolous or interposed for any improper purpose.

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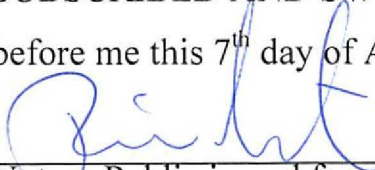
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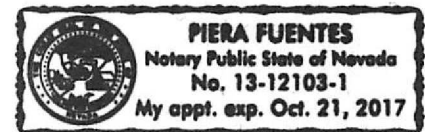
1 I further certify that this reply complies with all applicable Nevada Rules of
2 Appellate Procedure, in particular NRAP 28(e)(1), which requires every assertion in
3 the brief regarding matters in the record to be supported by a reference to the page and
4 volume number, if any, of the transcript or appendix where the matter relied on is to
5 be found. I understand that I may be subject to sanctions in the event that the
6 accompanying reply is not in conformity with the requirements of the Nevada Rules
7 of Appellate Procedure.

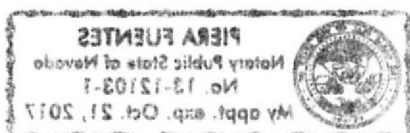
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JIN KIM

SUBSCRIBED AND SWORN to
before me this 7th day of August, 2014.


Notary Public in and for said
State and County





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