

1 CODE NO. \$2515
2 WASHOE COUNTY PUBLIC DEFENDER
3 JOHN REESE PETTY, State Bar Number 10
350 South Center Street, Fifth Floor
P.O. Box 11130
4 Reno, Nevada 89520-0027
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5 jpetty@washoecounty.us

Electronically Filed
Apr 20 2016 02:59 p.m.
Tracie K. Lindeman
Clerk of Supreme Court

6 Attorney for Jacqueline Guerrero (Mother)

7
8 IN THE FAMILY DIVISION

9 OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

10 IN AND FOR THE COUNTY OF WASHOE

11 In the Matter of the Parental Rights as to:

12 Case No. FV14-03897

13 ROBERT TAYLOR,
14 KAYLEIGH GUERRERO-TAYLOR,
15 NATHAN HUNT-TAYLOR, and
16 ETHAN HUNT-TAYLOR,
Minor Children

Dept. No. 2

17
18 **NOTICE OF APPEAL**

19 Jacqueline Guerrero, the mother of the minor children above named, hereby
20 appeals to the Supreme Court of Nevada from the Order Terminating Parental
21 Rights, entered in this action on March 21, 2016.

22 The undersigned hereby affirms, pursuant to NRS 239B.030, that this
23 document does not contain the social security number of any person.

24 DATED this 18th day of April 2016.

25 JEREMY T. BOSLER
WASHOE COUNTY PUBLIC DEFENDER

26 By: /s/ John Reese Petty
JOHN REESE PETTY, Chief Deputy

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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Washoe County Public Defender's Office, Reno, Nevada, and that this document was filed electronically in the Second Judicial District Court on the 18th day of April, 2016. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

Tyler M. Elcano, Deputy District Attorney
Washoe County District Attorney's Office

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

Jacqueline Guerrero
335 Record Street
Reno, Nevada 89512

John Reese Petty
John Reese Petty
Washoe County Public Defender's Office

1 CODE NO. 1310
2 WASHOE COUNTY PUBLIC DEFENDER
3 JOHN REESE PETTY, State Bar Number 10
350 South Center Street, Fifth Floor
P.O. Box 11130
4 Reno, Nevada 89520-0027
5 (775) 337-4827
jpetty@washoecounty.us

6 Attorney for Jacqueline Guerrero (Mother)

7
8 IN THE FAMILY DIVISION
9 OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
10 IN AND FOR THE COUNTY OF WASHOE
11

12 In the Matter of the Parental Rights as to:

Case No. FV14-03897

13 ROBERTO TAYLOR,
14 KAYLEIGH GUERRERO-TAYLOR,
15 NATHAN HUNT-TAYLOR, and
ETHAN HUNT-TAYLOR,,
Minor Children

Dept. No. 2

16
17 **CASE APPEAL STATEMENT**

- 18 1. Appellant, Jacqueline Guerrero.
- 19 2. This appeal is from the Order Terminating Parental Rights entered on
20 March 21, 2016, 2015, by the Honorable William A. Maddox, senior district judge.
- 21 3. The parties below were the Washoe County Department of Social
22 Services, represented by Tyler M. Elcano, Deputy Washoe County District
23 Attorney, and Jacqueline Guerrero, represented by Lee Elkins, Deputy Washoe
24 County Public Defender.
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1 4. The parties here are Jacqueline Guerrero, Appellant and Washoe County
2 Department of Social Services, Respondent.

3 5. Counsel on appeal: For the Appellant, the Washoe County Public
4 Defender's Office and John Reese Petty, Chief Appellate Deputy, 350 South Center
5 Street, Fifth Floor, P.O. Box 11130 Reno, Nevada 89520-0027, (775) 337-4827; and
6 for the Respondent, the Washoe County District Attorney's Office, One South
7 Sierra Street, Reno, Nevada 89501, (775) 337-5751.

8 6. Appellant was represented by appointed counsel.

9 7. Appellant is represented by appointed counsel.

10 8. An Order for the Appointment of Counsel was filed in this action on
11 January 22, 2015, appointing the Washoe County Public Defender's Office as
12 counsel for Jacqueline Guerrero.

13 9. The Petition to Terminate Parental Rights was filed on October 24, 2014,
14 and an amended Petition was filed on July 17, 2015.

15 10. The Washoe County Department of Social Services petitioned the family
16 district court to terminate Jacqueline Guerrero's parental rights to her four
17 children. Following a six-day trial held in August and September 2015, Senior
18 Judge Maddox granted the petition and, on March 21, 2016, filed an order
19 terminating Ms. Jessen's parental rights. Notice of entry of the court's order was
20 filed and served on the same day.

21 11. This case has not previously been the subject of an appeal or original
22 writ proceeding in this Court.
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12. Not applicable.

13. Unknown.

The undersigned hereby affirms, pursuant to NRS 239B.030, that this document does not contain the social security number of any person.

DATED this 18th day of April 2016.

JEREMY T. BOSLER
WASHOE COUNTY PUBLIC DEFENDER

By: /s/ John Reese Petty
JOHN REESE PETTY, Chief Deputy

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Tyler M. Elcano, Deputy District Attorney
Washoe County District Attorney's Office

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

Jacqueline Guerrero
335 Record Street
Reno, Nevada 89512

John Reese Petty
John Reese Petty
Washoe County Public Defender's Office

SECOND JUDICIAL DISTRICT COURT

STATE OF NEVADA

COUNTY OF WASHOE

Case History - FV14-03897

Case Description: TERM: R.TAYLOR, K.GUERRERO-TAYLOR, N.HUNT-TAYLOR

Case Number: FV14-03897 Case Type: STATE INITIATED TPR PET (D.A.) - Initially Filed On: 10/24/2014

Parties

<u>Party Type & Name</u>	<u>Party Status</u>
JUDG - EGAN WALKER - D2	Active
JUDG - CYNTHIA LU - D5	Party ended on: 12/1/2014 12:00:00AM
APD - Jennifer L. Lunt, Esq. - 3057	Active
APD - Jenna L. Garcia, Esq. - 13227	Active
ATTY - Tyler M. Elcano, Esq. - 10578	Active
DSS - Washoe County Department of Social Services - DSS	Active
FATH - ROBERT HUNT-TAYLOR - @1240184	Active
MEDR - Tamatha Schreinert - CONMED10	Party ended on: 4/15/2015 12:00:00AM
MINR - KAYLEIGH GUERRERO-TAYLOR - @1240185	Active
MINR - NATHAN HUNT-TAYLOR - @1240186	Active
MINR - ROBERTO TAYLOR - @1240182	Active
MOTH - JACQUELINE GUERRERO - @1240183	Active
PD - Jennifer Rains, Esq. - 10425	Active
PD - Lee Elkins, Esq. - 12732	Active
PD - John Reese Petty, Esq. - 10	Active
PD - Kathleen M. O'Leary, Esq. - 4472	Party ended on: 3/2/2016 12:00:00AM
PETR - WASHOE COUNTY DEPT. OF SOCIAL SERVICES - WCDSS	Active

Disposed Hearings

- 1 Department: D5 -- Event: TERM PARENTAL RIGHTS UNCONTEST -- Scheduled Date & Time: 1/12/2015 at 14:15:00
Extra Event Text: UNCONTESTED TPR - 15 MINUTES
Event Disposition: D360 - 1/12/2015
- 2 Department: D2 -- Event: SETTLEMENT CONFERENCE -- Scheduled Date & Time: 4/20/2015 at 11:00:00
Event Disposition: D475 - 4/20/2015
- 3 Department: D2 -- Event: TERM PARENTAL RIGHTS CONTESTED -- Scheduled Date & Time: 7/13/2015 at 09:00:00
Extra Event Text: TRIAL - FOUR DAYS
Event Disposition: D870 - 6/10/2015
- 4 Department: D2 -- Event: TERM PARENTAL RIGHTS CONTESTED -- Scheduled Date & Time: 7/14/2015 at 09:00:00
Extra Event Text: TRIAL - FOUR DAYS
Event Disposition: D870 - 6/10/2015
- 5 Department: D2 -- Event: TERM PARENTAL RIGHTS CONTESTED -- Scheduled Date & Time: 7/15/2015 at 09:00:00
Extra Event Text: TRIAL - FOUR DAYS
Event Disposition: D870 - 6/10/2015
- 6 Department: D2 -- Event: TERM PARENTAL RIGHTS CONTESTED -- Scheduled Date & Time: 7/16/2015 at 09:00:00
Extra Event Text: TRIAL - FOUR DAYS
Event Disposition: D870 - 6/10/2015

Report Does Not Contain Sealed Cases or Confidential Information

- 7 Department: D2 -- Event: TERM PARENTAL RIGHTS CONTESTED -- Scheduled Date & Time: 7/20/2015 at 09:00:00
Extra Event Text: TRIAL - DAY FOUR
Event Disposition: D870 - 6/10/2015
- 8 Department: D2 -- Event: TERM PARENTAL RIGHTS CONTESTED -- Scheduled Date & Time: 7/21/2015 at 09:00:00
Extra Event Text: TRIAL - DAY FOUR
Event Disposition: D870 - 6/10/2015
- 9 Department: B -- Event: TRIAL - NON JURY -- Scheduled Date & Time: 8/31/2015 at 09:00:00
Extra Event Text: TRIAL DAY ONE OF FIVE - OVERFLOW CALENDAR
Event Disposition: D832 - 8/31/2015
- 10 Department: D2 -- Event: Request for Submission -- Scheduled Date & Time: 8/31/2015 at 09:21:00
Extra Event Text: MOTION TO DISMISS FILED 8/21/15
Event Disposition: S200 - 8/31/2015
- 11 Department: B -- Event: TRIAL - NON JURY -- Scheduled Date & Time: 9/1/2015 at 09:00:00
Extra Event Text: TRIAL DAY TWO OF FIVE
Event Disposition: D832 - 9/1/2015
- 12 Department: D2 -- Event: Request for Submission -- Scheduled Date & Time: 10/20/2015 at 08:49:00
Extra Event Text: PETITIONER'S TRIAL BRIEF, MS. GUERRERO'S SUMMATION, MS. GUERRERO'S ERRATA AND REPLY, AND PETITIONER'S OPPOSITION
Event Disposition: S200 - 10/20/2015

Actions

- | | <u>Filing Date</u> | <u>-</u> | <u>Docket Code & Description</u> |
|---|--------------------|----------|--|
| 1 | 10/24/2014 | - | 3637 - Pet Terminate Parental Rights
Additional Text: Transaction 4668417 - Approved By: MFERNAND : 10-24-2014:15:38:01 |
| 2 | 12/2/2014 | - | 1250 - Application for Setting
Additional Text: JANUARY 12, 2015 @ 2:15PM UNCONTESTED TPR HEARING - Transaction 4717480 - Approved By: MCHOLICO : 12-02-2014:15:18:24 |
| 3 | 12/2/2014 | - | NEF - Proof of Electronic Service
Additional Text: Transaction 4717690 - Approved By: NOREVIEW : 12-02-2014:15:19:26 |
| 4 | 12/3/2014 | - | 2550 - Notice of Hearing
Additional Text: NOTICE OF HEARING TO TERMINATE PARENTAL RIGHTS-JAN.12, 2015 @ 2:15PM |
| 5 | 12/10/2014 | - | 1067 - Affidavit of Service
Additional Text: Transaction 4730547 - Approved By: YLLOYD : 12-10-2014:15:36:07 |
| 6 | 12/10/2014 | - | NEF - Proof of Electronic Service
Additional Text: Transaction 4730915 - Approved By: NOREVIEW : 12-10-2014:15:37:11 |
| 7 | 12/10/2014 | - | 1005 - Acceptance of Service
Additional Text: Transaction 4731186 - Approved By: MELWOOD : 12-11-2014:08:27:43 |
| 8 | 12/11/2014 | - | NEF - Proof of Electronic Service
Additional Text: Transaction 4731319 - Approved By: NOREVIEW : 12-11-2014:08:30:28 |
| 9 | 12/17/2014 | - | 1005 - Acceptance of Service
Additional Text: ACKNOWLEDGMENT OF SERVICE - Transaction 4739761 - Approved By: MCHOLICO : 12-17-2014:09:21:02 |

- 10 12/17/2014 - NEF - Proof of Electronic Service
Additional Text: Transaction 4739962 - Approved By: NOREVIEW : 12-17-2014:09:22:06
- 11 12/18/2014 - 1520 - Declaration
Additional Text: DECLARATIONOF NON-SERVICE / ROBERT HUNT-TAYLOR - Transaction 4742587 - Approved By: MELWOOD : 12-18-2014:12:05:33
- 12 12/18/2014 - NEF - Proof of Electronic Service
Additional Text: Transaction 4742695 - Approved By: NOREVIEW : 12-18-2014:12:06:28
- 13 12/24/2014 - 3725 - Proof ...
Additional Text: PROOF OF NON-SERVICE - Transaction 4750404 - Approved By: MCHOLICO : 12-24-2014:15:20:58
- 14 12/24/2014 - NEF - Proof of Electronic Service
Additional Text: Transaction 4750422 - Approved By: NOREVIEW : 12-24-2014:15:21:46
- 15 1/21/2015 - MIN - ***Minutes
Additional Text: TPR HEARING MINUTES 1-15-2015 - Transaction 4781236 - Approved By: NOREVIEW : 01-21-2015:10:18:16
- 16 1/21/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4781237 - Approved By: NOREVIEW : 01-21-2015:10:19:08
- 17 1/21/2015 - MIN - ***Minutes
Additional Text: CORRECTED TPR HEARING MINUTES 1-12-2015 - Transaction 4781245 - Approved By: NOREVIEW : 01-21-2015:10:21:49
- 18 1/21/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4781249 - Approved By: NOREVIEW : 01-21-2015:10:22:47
- 19 1/22/2015 - 2715 - Ord Appointing Counsel
Additional Text: Transaction 4784407 - Approved By: NOREVIEW : 01-22-2015:14:25:06
- 20 1/22/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4784408 - Approved By: NOREVIEW : 01-22-2015:14:25:56
- 21 1/22/2015 - 2610 - Notice ...
Additional Text: NOTICE OF CONFLICT - Transaction 4785078 - Approved By: MCHOLICO : 01-23-2015:09:06:55
- 22 1/23/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4785334 - Approved By: NOREVIEW : 01-23-2015:09:07:52
- 23 1/27/2015 - 2520 - Notice of Appearance
Additional Text: JENNIFER LUNT AND JENNA GARCIA FOR ROBIN HUNT-TAYLOR - Transaction 4791238 - Approved By: YLLOYD : 01-28-2015:08:17:38
- 24 1/28/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4791521 - Approved By: NOREVIEW : 01-28-2015:08:18:26
- 25 2/26/2015 - 1250 - Application for Setting
Additional Text: SETTLEMENT CONFERENCE SET FOR APRIL 20, 2015 AT 11:00 A.M. FOR ONE HOUR - SECOND SET
- 26 2/26/2015 - 3176 - Ord Refer Juv Dependency Med
Additional Text: Transaction 4836060 - Approved By: NOREVIEW : 02-26-2015:14:49:44
- 27 2/26/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4836066 - Approved By: NOREVIEW : 02-26-2015:14:50:44

- 28 3/20/2015 - 2610 - Notice ...
Additional Text: Transaction 4871894 - Approved By: MFERNAND : 03-20-2015:16:53:57
- 29 3/20/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4872053 - Approved By: NOREVIEW : 03-20-2015:16:55:02
- 30 4/9/2015 - 3835 - Report...
Additional Text: Memo RE Dependency Mediation - Transaction 4899791 - Approved By: MCHOLICO : 04-09-2015:12:07:05
- 31 4/9/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4899810 - Approved By: NOREVIEW : 04-09-2015:12:08:05
- 32 4/14/2015 - 2610 - Notice ...
Additional Text: NOTICE OF RELEASE OF DEPENDENCY MEDIATOR - Transaction 4906467 - Approved By: MPURDY : 04-15-2015:08:36:52
- 33 4/15/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4906884 - Approved By: NOREVIEW : 04-15-2015:08:38:10
- 34 4/15/2015 - 3935 - Settlement Conference Statemnt
Additional Text: Transaction 4907360 - Approved By: MELWOOD : 04-15-2015:11:52:45
- 35 4/15/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4907673 - Approved By: NOREVIEW : 04-15-2015:11:53:42
- 36 4/15/2015 - 3935 - Settlement Conference Statemnt
Additional Text: Transaction 4908905 - Approved By: MELWOOD : 04-16-2015:09:28:33
- 37 4/16/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4909187 - Approved By: NOREVIEW : 04-16-2015:09:29:44
- 38 5/7/2015 - 1250 - Application for Setting
Additional Text: TRIAL SET AS FOLLOWS:
JULY 13: 9:00-5:00
JULY 14: 9:00-11:00
JULY 15: 9:00-12:00
JULY 16: 9:00-12:00
JULY 20: 9:00-5:00
JULY 21: 9:00-11:00
- 39 6/10/2015 - 4025 - Stip & Ord to Continue
Additional Text: STIPULATION AND ORDER TO CONTINUE TERMINATION OF PARENTAL RIGHTS TRIAL - Transaction 4992249 - Approved By: NOREVIEW : 06-10-2015:09:43:06
- 40 6/10/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 4992251 - Approved By: NOREVIEW : 06-10-2015:09:43:56
- 41 6/18/2015 - 1250 - Application for Setting
Additional Text: TRIAL SET FOR FIVE DAYS FROM AUGUST 31-SEPTEMBER 4 ON OVERFLOW CALENDAR
- 42 7/17/2015 - 1110 - Amended Pet ...
Additional Text: AMENDED PETITION TO TERMINATE PARENTAL RIGHTS - Transaction 5050802 - Approved By: PMSEWELL : 07-17-2015:15:20:59
- 43 7/17/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5051054 - Approved By: NOREVIEW : 07-17-2015:15:21:48

- 44 8/6/2015 - 3980 - Stip and Order...
Additional Text: STIPULATED SCHEDULING ORDER - Transaction 5080165 - Approved By: NOREVIEW : 08-06-2015:08:37:30
- 45 8/6/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5080167 - Approved By: NOREVIEW : 08-06-2015:08:38:36
- 46 8/21/2015 - 2315 - Mtn to Dismiss ...
Additional Text: RESPONDENT'S MOTION TO DISMISS OR CONTINUE - Transaction 5106063 - Approved By: CSULEZIC : 08-21-2015:14:26:12
- 47 8/21/2015 - 1120 - Amended ...
Additional Text: AMENDED RESPONDENT'S MOTION TO DISMISS OR CONTINUE - Transaction 5106121 - Approved By: CSULEZIC : 08-21-2015:14:33:40
- 48 8/21/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5106262 - Approved By: NOREVIEW : 08-21-2015:14:28:26
- 49 8/21/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5106285 - Approved By: NOREVIEW : 08-21-2015:14:34:29
- 50 8/26/2015 - 1260 - Application Produce Prisoner
Additional Text: RESPONDENT'S APPLICATION TO PRODUCE PRISONER - Transaction 5113271 - Approved By: CSULEZIC : 08-26-2015:16:00:38
- 51 8/26/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5113639 - Approved By: NOREVIEW : 08-26-2015:16:01:39
- 52 8/26/2015 - 4205 - Trial Statement...
Additional Text: PETITIONER'S TRIAL STATEMENT - Transaction 5113916 - Approved By: CSULEZIC : 08-27-2015:09:49:50
- 53 8/26/2015 - 4205 - Trial Statement...
Additional Text: RESPONDENT MOTHER'S TRIAL STATEMENT - Transaction 5113917 - Approved By: CSULEZIC : 08-27-2015:09:49:05
- 54 8/27/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5114286 - Approved By: NOREVIEW : 08-27-2015:09:49:51
- 55 8/27/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5114288 - Approved By: NOREVIEW : 08-27-2015:09:52:23
- 56 8/27/2015 - FIE - **Document Filed in Error
Additional Text: Transaction 5114495 - Approved By: NOREVIEW : 08-27-2015:10:34:50
- 57 8/27/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5114501 - Approved By: NOREVIEW : 08-27-2015:10:35:47
- 58 8/27/2015 - 3370 - Order ...
Additional Text: ORDER TO PRODUCE PRISONER - Transaction 5114637 - Approved By: NOREVIEW : 08-27-2015:11:03:52
- 59 8/27/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5114641 - Approved By: NOREVIEW : 08-27-2015:11:04:52
- 60 8/28/2015 - 3370 - Order ...
Additional Text: Transaction 5117355 - Approved By: NOREVIEW : 08-28-2015:13:49:38
- 61 8/28/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5117360 - Approved By: NOREVIEW : 08-28-2015:13:50:38

- 62 8/28/2015 - 3860 - Request for Submission
Additional Text: MOTION TO DISMISS FILED 8/21/15 - Transaction 5117945 - Approved By: CSULEZIC : 08-31-2015:08:38:53
PARTY SUBMITTING: LEE ELKINS, ESQ
DATE SUBMITTED: 8/31/15
SUBMITTED BY: CS
DATE RECEIVED JUDGE OFFICE:
- 63 8/31/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5118414 - Approved By: NOREVIEW : 08-31-2015:08:39:54
- 64 8/31/2015 - S200 - Request for Submission Complet
No additional text exists for this entry.
- 65 9/4/2015 - 1520 - Declaration
Additional Text: Transaction 5129309 - Approved By: MTORRES : 09-04-2015:16:55:38
- 66 9/4/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5129426 - Approved By: NOREVIEW : 09-04-2015:16:56:33
- 67 9/15/2015 - 4185 - Transcript
Additional Text: Transaction 5142340 - Approved By: NOREVIEW : 09-15-2015:14:58:57
- 68 9/15/2015 - 4185 - Transcript
Additional Text: Transaction 5142346 - Approved By: NOREVIEW : 09-15-2015:14:58:57
- 69 9/15/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5142350 - Approved By: NOREVIEW : 09-15-2015:15:01:41
- 70 9/15/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5142351 - Approved By: NOREVIEW : 09-15-2015:15:01:41
- 71 9/17/2015 - 4185 - Transcript
Additional Text: Corrected - Transaction 5145224 - Approved By: NOREVIEW : 09-17-2015:08:27:12
- 72 9/17/2015 - 4185 - Transcript
Additional Text: Corrected - Transaction 5145230 - Approved By: NOREVIEW : 09-17-2015:08:28:14
- 73 9/17/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5145228 - Approved By: NOREVIEW : 09-17-2015:08:28:01
- 74 9/17/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5145233 - Approved By: NOREVIEW : 09-17-2015:08:29:12
- 75 9/18/2015 - 4185 - Transcript
Additional Text: Transaction 5147451 - Approved By: NOREVIEW : 09-18-2015:08:33:00
- 76 9/18/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5147455 - Approved By: NOREVIEW : 09-18-2015:08:33:52
- 77 9/22/2015 - 4185 - Transcript
Additional Text: Transaction 5153663 - Approved By: NOREVIEW : 09-22-2015:15:52:16
- 78 9/22/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5153670 - Approved By: NOREVIEW : 09-22-2015:15:53:36

- 79 9/24/2015 - 4185 - Transcript
Additional Text: In re Term Taylor - Trial Day 6 9/15/15 - Transaction 5157866 - Approved By: NOREVIEW : 09-24-2015:14:55:20
- 80 9/24/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5157872 - Approved By: NOREVIEW : 09-24-2015:14:56:18
- 81 10/1/2015 - 4185 - Transcript
Additional Text: Transaction 5167929 - Approved By: NOREVIEW : 10-01-2015:11:29:02
- 82 10/1/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5167931 - Approved By: NOREVIEW : 10-01-2015:11:29:59
- 83 10/2/2015 - FIE - **Document Filed in Error
Additional Text: FILED DOC IN WRONG CASE - CS 3-03-16
- 84 10/2/2015 - NEF - Proof of Electronic Service
Additional Text: FIE - CS 3-03-16
- 85 10/12/2015 - 3975 - Statement ...
Additional Text: PETITIONER'S TRIAL BRIEF - Transaction 5184698 - Approved By: MCHOLICO : 10-13-2015:09:01:30
- 86 10/13/2015 - 3835 - Report...
Additional Text: SUMMATION - Transaction 5184943 - Approved By: TBRITTON : 10-13-2015:09:07:43
- 87 10/13/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5185147 - Approved By: NOREVIEW : 10-13-2015:09:03:01
- 88 10/13/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5185199 - Approved By: NOREVIEW : 10-13-2015:09:09:29
- 89 10/19/2015 - 1650 - Errata...
Additional Text: ERRATA AND REPLY - Transaction 5193938 - Approved By: YVILORIA : 10-19-2015:09:02:59
- 90 10/19/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5193998 - Approved By: NOREVIEW : 10-19-2015:09:03:53
- 91 10/19/2015 - 2650 - Opposition to ...
Additional Text: PETITIONER'S OPPOSITION - Transaction 5194318 - Approved By: YVILORIA : 10-19-2015:11:01:32
- 92 10/19/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5194430 - Approved By: NOREVIEW : 10-19-2015:11:02:25
- 93 10/19/2015 - 3860 - Request for Submission
Additional Text: PETITIONER'S TRIAL BRIEF, MS. GUERRERO'S SUMMATION, MS. GUERRERO'S ERRATA AND REPLY, AND PETITIONER'S OPPOSITION (PAPER ORDER NOT PROVIDED) - Transaction 5195794 - Approved By: TBRITTON : 10-20-2015:08:31:58
PARTY SUBMITTING: TYLER M. ELCANO, ESQ.
DATE SUBMITTED: OCTOBER 19, 2015
SUBMITTED BY: TBRITTON
DATE RECEIVED JUDGE OFFICE:
- 94 10/20/2015 - NEF - Proof of Electronic Service
Additional Text: Transaction 5196167 - Approved By: NOREVIEW : 10-20-2015:08:34:34
- 95 10/20/2015 - S200 - Request for Submission Complet
No additional text exists for this entry.

- 96 3/21/2016 - 3267 - Ord Terminate Par/Rights
Additional Text: Transaction 5426191 - Approved By: NOREVIEW : 03-21-2016:09:00:28
- 97 3/21/2016 - F275 - Bench N/J/T Judgment Reached
No additional text exists for this entry.
- 98 3/21/2016 - NEF - Proof of Electronic Service
Additional Text: Transaction 5426200 - Approved By: NOREVIEW : 03-21-2016:09:01:27
- 99 3/21/2016 - 2540 - Notice of Entry of Ord
Additional Text: Transaction 5427198 - Approved By: NOREVIEW : 03-21-2016:13:19:30
- 100 3/21/2016 - NEF - Proof of Electronic Service
Additional Text: Transaction 5427202 - Approved By: NOREVIEW : 03-21-2016:13:20:30
- 101 3/23/2016 - 1250 - Application for Setting
Additional Text: STATUS CONFERENCE SET FOR MAY 5, 2016 AT 3:30 FOR THIRTY MINUTES.
- 102 3/30/2016 - 2520 - Notice of Appearance
Additional Text: JOHN REESE PD - JACQUELINE GUERRERO - Transaction 5441410 - Approved By: CSULEZIC : 03-30-2016:10:46:06
- 103 3/30/2016 - NEF - Proof of Electronic Service
Additional Text: Transaction 5441439 - Approved By: NOREVIEW : 03-30-2016:10:47:06
- 104 4/18/2016 - 2515 - Notice of Appeal Supreme Court
Additional Text: Transaction 5470452 - Approved By: YVILORIA : 04-18-2016:09:56:17
- 105 4/18/2016 - 1310 - Case Appeal Statement
Additional Text: Transaction 5470458 - Approved By: YVILORIA : 04-18-2016:09:56:30
- 106 4/18/2016 - NEF - Proof of Electronic Service
Additional Text: Transaction 5470467 - Approved By: NOREVIEW : 04-18-2016:09:57:13
- 107 4/18/2016 - NEF - Proof of Electronic Service
Additional Text: Transaction 5470470 - Approved By: NOREVIEW : 04-18-2016:09:57:34
- 108 4/19/2016 - 1350 - Certificate of Clerk
Additional Text: CERTIFICATE OF CLERK AND TRANSMITTAL - NOTICE OF APPEAL - Transaction 5472859 - Approved By: NOREVIEW : 04-19-2016:09:37:01

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**IN THE FAMILY DIVISION
OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE**

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In the Matter of

Roberto Taylor, DOB 06-15-2007
Kayleigh Guerrero-Taylor, DOB 02-13-2010
Nathan Hunt-Taylor, DOB 06-29-2011 and
Ethan Hunt-Taylor, DOB 01-01-2014

Minor Children.

Case No. FV 14-03897
Dept. No. D2

ORDER TERMINATING PARENTAL RIGHTS

This matter came before the Court pursuant to an Amended Petition to Terminate Parental Rights filed on July 17, 2015. A trial was held in this matter on August 31 through September 4, 2015 and then on September 15, 2015. Post trial briefing was completed on or around October 19, 2016. Washoe County Social Services was represented by Washoe County Deputy District Attorney Tyler M. Elcano at all times. Jacqueline Guerrero was present and represented by Washoe County Deputy Public Defender Lee Elkins at all times.

The four children who are the subject of this Petition are Roberto Taylor ("Roberto"), whose date of birth is June 15, 2007; Kayleigh Guerrero Taylor ("Kayleigh"), whose date of birth is February 13, 2010; Nathan Hunt-Taylor ("Nathan"), whose date of birth is June 29, 2011; and Ethan Hunt-Taylor ("Ethan"), whose date of birth is January 1, 2014.

The children's biological mother is Jacquelyn Guerrero. The children's legal father

1 is Robert Hunt-Taylor.

2 After a review of the pleadings, testimony and evidence presented at trial, the
3 Court GRANTS the Amended Petition for Termination of Parental Rights.

4 **THE AMENDED PETITION FOR TERMINATION OF PARENTAL RIGHTS**

5 The Petitioner's assert in their Amended Petition for Termination of Parental
6 Rights that grounds exist for terminating the parental rights of Ms. Guerrero, the mother
7 of Roberto, Kayleigh, Nathan, and Ethan, and Mr. Hunt-Taylor, the father of Roberto,
8 Kayleigh, Nathan, and Ethan on the grounds that:

9 1. Pursuant to NRS 128.105(1), the best interests of Roberto, Kayleigh,
10 Nathan, and Ethan will be served by the termination of the parental rights of their
11 biological parents.

12 2. Pursuant to NRS 128.105(2)(b), Roberto, Rayleigh, Nathan, and Ethan are
13 neglected children as Ms. Guerrero and Mr. Hunt-Taylor have, by reasons of their faults
14 or habits, neglected and refused to provide the children with proper parental care. Ms.
15 Guerrero and Mr. Hunt-Taylor have neglected or refused to provide proper or necessary
16 subsistence, education, medical or surgical care, or other care necessary for the health,
17 morals, or well-being of Roberto, Kayleigh, Nathan, and Ethan.

18 3. Pursuant to NRS 128.105(2)(c), Ms. Guerrero and Mr. Hunt-Taylor are
19 unfit parents in that, by reason of their faults or habits or conduct toward Roberto,
20 Kayleigh, Nathan, and/or Ethan or other persons, they have failed to provide the children
21 with proper care, guidance, and support.

22 4. Pursuant to NRS 128.105(2)(d), Ms. Guerrero and Mr. Hunt-Taylor have
23 failed to adjust, in that they have been unable or unwilling within a reasonable period of
24 time to remedy substantially conditions which led to the out-of-home placement of
25 Roberto, Kayleigh, Nathan, and Ethan, notwithstanding reasonable and appropriate
26 efforts on the part of WCDSS to return the children.

27 5. Pursuant to NRS 128.105(2)(e), there is risk of serious physical, mental or
28 emotional injury to Roberto, Kayleigh, Nathan, and Ethan if they are returned to, or

- 1 2. Alicia Kraft, a Social Worker with the Washoe County Department of
2 Social Services.
- 3 3. Erika Meszaros, a Worker with the Emergency Response Unit of the
4 Washoe County Department of Social Services.
- 5 4. Denise Tyre, a Social Worker with the Washoe County Department of
6 Social Services.
- 7 5. Suzanne Aberasturi, Ph.D., a psychologist specializing in neuropsychology.
- 8 6. Amanda Buttacavoli, a Licensed Clinical Social Worker working as an
9 independent contractor with Healing Minds.
- 10 7. Rocio Lopez, a Social Worker with the Washoe County Department of
11 Social Services.
- 12 8. Deken Gossett, a Marriage and Family Therapist intern working with
13 Clover Community Counseling.
- 14 9. Belinda Boan, a Family Nurse Practitioner, working with Sequel Family
15 Alliance.
- 16 10. Brianna Carter, a psychotherapist and a Marriage and Family Counselor
17 employed by Great Basin Behavioral Health and Wellness.
- 18 11. Julius Rogina, Ph.D., a clinical and forensic phytologist.
- 19 12. Sandra Matute, the foster parent who has custody of the subject children.
- 20 13. Dori Orlich, a Licensed Clinical Social Worker working independently.
- 21 14. Cassondra Pasley, a supervisor at the Children's Cabinet.
- 22 15. Malia Seronio, a Permanency Worker with the Washoe County Department
23 of Social Services.
- 24 16. Cynthia Heldenbrand, a Social Worker supervisor at the Nevada State
25 Welfare Office.
- 26 17. Maribel Stalker and Troy Stalker, co-tenants with Jacqueline Guerrero.
- 27 18. Malia Seronio, a Social Worker with the Washoe County Department of
28 Social Services.

1 has been placed outside his home pursuant to NRS chapter 432B, and "has resided outside
2 of his home pursuant to that placement for 14 months of any 20 consecutive months, the
3 best interests of the child must be presumed to be served by the termination of parental
4 rights."

5 Additionally, NRS 128.005 sets forth factors to be considered in determining the
6 best interests of the child. Specifically, NRS 128.005(2)(c) provides that the "continuing
7 needs of a child for proper physical, mental and emotional growth and development are
8 the decisive considerations in proceedings for termination of parental rights." See *Matter*
9 *of N.J.*, 116 Nev. at 8009 8 P.3d at 132-33 ("These factors allow the district court to
10 consider the distinct facts of each case in deciding whether or not to terminate parental
11 rights.").

12 **B. Parental Fault**

13 In addition to considering the best interests of the child, parental fault must be
14 shown by clear and convincing evidence. NRS 128.105(2) provides that parental fault can
15 be shown by one of the following:

16 (a) Abandonment of the child;

17 (b) Neglect of the child;

18 (c) Unfitness of the parent;

19 (d) Failure of parental adjustment;

20 (e) Risk of serious physical, mental or emotional injury to the child if he were
21 returned to, or remains in, the home of his parent or parents;

22 (f) Only token efforts by the parent or parents: (1) To support or communicate with
23 the child; (2) To prevent neglect of the child; (3) To avoid teeing an unfit parent;
24 or (4) To eliminate the risk of serious physical, mental or emotional injury to the
25 child; or

26 (g) With respect to termination of the parental rights of one parent, the
27 abandonment by that parent.
28

1 I. Neglect (NRS 128.105(b))

2 A neglected child is defined as a child:

3 1. Who lacks the proper parental care by reason of the fault or
4 habits of his or her parent, guardian or custodian;

5 2. Whose parent, guardian or custodian neglects or refuses to
6 provide proper or necessary subsistence, education, medical or surgical
7 care, or other care necessary for the child's health, morals or well-being;

8 3. Whose parent, guardian or custodian neglects or refuses to
9 provide the special care made necessary by the child's physical or mental
10 condition;

11 4. Who is found in a disreputable place, or who is permitted to
12 associate with vagrants or vicious or immoral persons; or

13 5. Who engages or is in a situation dangerous to life or limb, or
14 injurious to health or morals of the child or others, and the parent's neglect
15 need not be willful.

16 In determining neglect, the Court shall consider, without limitation, repeated or
17 continuous failure by the parent, although physically and financially able, to provide the
18 child with adequate food, clothing, shelter, education or other care and control necessary
19 for the child's physical, mental and emotional health and development" NRS
20 128.106(5). "[N]eglect must be serious and persistent and sufficiently harmful to the child
21 so as to mandate a forfeiture of parental rights. In such a case a parent may be adjudged to
22 be unsuitable to maintain the parental relationship and, therefore, to deserve to lose it."

23 *Champagne v. Welfare Division*, 100 J1ev. 640, 648, 691 P.2d 849, 855 (1984),
24 overruled on other grounds and superseded by statute on other grounds as recognized by
25 *Matter of Parental Rights as to N.J.*, 116 Nev. '90, 8 P.3d 126, (2000).

26 The level of neglect necessary to satisfy the statute has been identified and
27 discussed by the Nevada Supreme Court. *Cf. Matter of Parental Rights*
28 *as to D.R.H.*, 120 Nev. 422, 429, 92 P.3d 1230, 1234 (2004) (children were neglected

1 where parent used drugs, there was domestic violence in the home while the children
2 were present, and the children were unsupervised, dirty, and injured while in their parent's
3 care); *In the Matter of the Parental Rights as to N.J.*, 125 Nev. 835, 221 P.3d at 1262,
4 (2009), (child was neglected where mother had ongoing addiction to drugs, missed half of
5 the scheduled visitations during the first 17 months of the child's life, and never provided
6 any financial assistance).

7 II. Unfitness of the Parent (NRS 128.105(c))

8 An unfit parent is defined as “any parent of a child who, by reason of the parent’s
9 fault or habit or conduct toward the child or other persons, fails to provide such child with
10 proper care, guidance and support.” Similar to neglect, the considerations enumerated in
11 NRS 128.106 shall also be taken into account to determine if an individual is an unfit
12 parent.

13 In accordance with NRS 128.106(1), to determine if a parent is unfit, the Court
14 must consider “[e]motional illness, mental illness or mental deficiency of the parent
15 which renders the parent consistently unable to care for the immediate and continuing
16 physical or psychological needs of the child for extended periods of time.” Additionally,
17 when determining if a parent is unfit, the court shall consider the “[r]epeated or
18 continuous failure by the parent, although physically and financially able, to provide the
19 child with adequate food, clothing, shelter, education or other care and control necessary
20 for the child’s physical, mental, and emotional health and development” NRS
21 128.106(5). Finally, the court shall consider the “[i]nability of appropriate public or
22 private agencies to reunite the family despite reasonable efforts on the part of the
23 agencies” when determining if a parent is unfit. NRS 128.106(8).

24 Unfitness generally includes continued drug use, criminal activity, domestic
25 violence, or an overall inability to provide for the child's 'physical, mental or emotional
26 health and development.” (Citation omitted)

27 III. Parental Adjustment (NRS 128.105(d))

28 Failure of parental adjustment occurs when a parent is unable or unwilling to

1 correct the circumstances, conduct or conditions which led to the placement of a child
2 outside the home. See NRS 128.0126.

3 NRS 128.109(1)(b) provides that if a parent fails to comply substantially with the
4 case plan within six months after its inception, there is a presumption that the parent has
5 failed to adjust. The Nevada Supreme Court, however, has stated that "[t]he parent . . .
6 must be shown to be at fault in some manner . . . [and] cannot be judged unsuitable by
7 reason of failure to comply with requirements and plans that are . . . impossible . . . to
8 abide by." *Champagne v. Welfare Division*, 100 Nev. 640, 652, 691 P.2d 849, 857
9 (1984), overruled on other grounds by *Matter of N.J.*, 116 Nev. 790, 8 P.3d 126.
10 Moreover, the Court has recognized that failure of parental adjustment as a basis for
11 termination is "fraught with difficulties and must be applied with caution." *Matter of*
12 *Parental Rights of Montgomery*, 112 Nev. 719, 729, 917 P.2d 949, 956 (1996) (quoting
13 *Champagne*, 100 Nev. at 652, 691 P.2d at 857), superseded by statute on other grounds
14 as recognized by *Matter of N.J.*, 116 Nev. 790, 8 P.3d 126.

15 IV. Risk of serious physical, mental or emotional injury to the child if
16 the child were returned to, or remains in, the home of his or her parent or parents
17 (NRS 128.105(e))

18 In interpreting this provision, the Nevada Supreme Court has stated as follows:
19 "[A]buse of a child may or may not render a parent unsuitable to be a parent . . . Such a
20 risk may be mitigated, and a child may be safely returned to the home; or the risk may be
21 of such magnitude and persistency as to render the parent unsuitable and justify forfeiture
22 of parental rights." *Champagne v. Welfare Division*, 100 Nev. at 649, 691 P.2d at 855,
23 overruled on other grounds and superseded by statute on other grounds as recognized by
24 *Matter of Parental Rights as to NJ.*, 116 Nev. 790, 8 P.3d 126, (2000).

25 V. Token Efforts (NRS 128.105(f))

26 NRS 128.109(1)(a) provides that "[i]f the child has resided outside of his home
27 pursuant to [chapter 432B of NRS] for 14 months of any 20 consecutive months, it must
28 be presumed that the parent or parents have demonstrated only token efforts to care for

1 the child as set forth in paragraph (f) of subsection 2 of NRS 128.105.”

2 **C. Additional findings which may be necessary**

3 **I. Efforts toward reunification**

4 Because the children are not currently in their mother's custody, NRS 128.107
5 requires this Court to consider:

- 6 1. The services provided or offered to the parent or parents to facilitate a
7 reunion with the child.
- 8 2. The physical, mental or emotional condition and needs of the child and the
9 child's desires regarding the termination, if the court determines the child is of sufficient
10 capacity to express his or her desires.
- 11 3. The effort the parent or parents have made to adjust their circumstances,
12 conduct or conditions to make it in the child's best interest to return the child to his or her
13 home after a reasonable length of time, including but not limited to:
 - 14 (a) The payment of a reasonable portion of substitute physical care and
15 maintenance, if financially able;
 - 16 (b) The maintenance of regular visitation or other contact with the children
17 which was designed and carried out in a plan to reunite the child with the
18 parent or parents; and
 - 19 (c) The maintenance of regular contact and communication with the
20 custodian of the child.
- 21 4. Whether additional services would be likely to bring about lasting parental
22 adjustment enabling a return of the child to the parent or parents within a predictable
23 period.

24 **FINDINGS AND CONCLUSIONS**

25 1. Roberto, Kayleigh, and Nathan were removed from parental custody by the
26 Washoe County Department of Social Services on April 19, 2013, and, pursuant to the
27 underlying NRS 432B dependency matter, have remained in the care and custody of
28 Washoe County Department of Social Services. They have therefore been placed outside

1 of their home in the care and custody of Washoe County Department of Social Services in
2 excess of 28 of the last 28 consecutive months.

3 2. The presumptions in NRS 128.109(1)(a) and 128.109(2) apply. Pursuant to
4 NRS 128.109(1)(a), it is presumed Ms. Guerrero has demonstrated only token efforts to
5 care for Roberto, Kayleigh, and Nathan pursuant to NRS 128.105(f)(2). Parental fault is
6 established pursuant to NRS 128.105(2)(f). Pursuant to NRS 128.109(2), it is presumed
7 the best interests of Roberto, Kayleigh, and Nathan are served by the termination of Ms.
8 Guerrero's parental rights. The Court finds that Ms. Guerrero did not overcome the NRS
9 128.109 presumption and therefore, the Court finds it is in the best interest of Roberto,
10 Kayleigh, and Nathan that Ms. Guerrero's parental rights are terminated.

11 3. Petitioner, Washoe County Department of Social Services, has proven, by
12 clear and convincing evidence the existence of parental fault on the part of Ms. Guerrero.
13 Ms. Guerrero has failed to have a stable income. She has failed to have a stable and safe
14 place for the children to live. Finally, she has not addressed her own severe emotional
15 and mental illnesses. Further, clear and convincing evidence exists which demonstrates
16 that the best interests of the Roberto, Kayleigh, Nathan and Ethan are served by
17 termination of Ms. Guerrero's parental rights.

18 3. Ms. Guerrero has made efforts to assume all of her responsibilities as a
19 parent but falls short in each of the important areas required. It is suggested that poverty
20 is what has caused her failure to do what is necessary to reunify with her children. That is
21 not all the truth. She has not consistently remained employed enough to support the
22 children financially. She has not been able to maintain a stable and safe place for the
23 children to live. Finally, she has not persisted in addressing here own emotional and
24 mental illnesses. The Court is uncertain as to whether or not she can achieve any of the
25 above. Additionally, it appears that her conduct has imperiled her opportunity to receive
26 food stamps and her right to receive Temporary Aid for Needy Families is running out
27 which means that even with government assistance, she would not be able to provide for
28 her children. If the Court could place the children in suspended animation and hope that

1 Ms. Guerrero could make substantial changes in a short time, it would. However, the
2 children lives are moving on and the Court cannot stop that. No time remains in order to
3 give Ms. Guerrero time to do what she has not done over that last several months and
4 years. If the Roberto, Kayleigh, Nathan and Ethan were returned to her care at this time,
5 she has no means to support them and no means with which to provide a stable and safe
6 place for them to live. The children would be at an increased and untenable risk of
7 re-removal over an inability to provide even for their basic needs.

8 4. Roberto, Kayleigh, Nathan and Ethan are thriving in their potential adoptive
9 placement. Family bonds are developing and they are demonstrating an abiding sense of
10 safety, consistency, bonding and attachment. Their best interests are served by
11 termination of their mother's parental rights and the opportunity to remain in their current
12 home.

13 5. Washoe County Department of Social Services has provided reasonable
14 efforts to prevent the out of home placement of Roberto, Kayleigh, Nathan and Ethan.
15 From the time of removal in April 19, 2014³ and September 11, 2014, and since, Washoe
16 County Department of Social Services has attempted to engage Ms. Guerrero and support
17 her ability to care for all of her children. Services were offered to her in various ways
18 including referral to the Children's Cabinet. She was given counseling support to address
19 her emotional and mental problems. Washoe County Department of Social Services made
20 repeated attempts, across multiple providers and modalities, to engage Ms. Guerrero in
21 services. Ms. Guerrero made some efforts to avail herself of the services provided to her
22 but invariably failed to completely follow through. Her failure to follow through as much
23 as any other fact frustrated any chance of reunification.

24 The perfect is the enemy of good! The Court has reviewed the more than 1200
25 pages in the Court file, the transcript of the trial in this matter and the pleadings filed by
26 counsel both before and after the trial. It is extremely difficult to terminate a person's
27 rights to their children. It is unimaginable that anyone would do so with less than clear
28 and convincing evidence that termination was in the best interest of the children. The

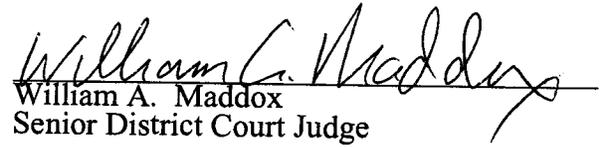
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Court has a great deal of sympathy for Jacquelyn Guerrero. She has made some effort but again when necessary fails to follow through to accomplish necessary tasks. A minimal level must be achieved, not perfection, but a minimal level must be achieved in order to provide children with the basic necessities. Ms. Guerrero has not achieved that level over the course of this case and the Court is not convinced she could in the future.

For all of the reasons stated above, the Petition to Terminate the Parental Rights of Jacquelyn Guerrero to Roberto Taylor, Kayleigh Guerrero Taylor, Nathan Hunt-Taylor and Ethan Hunt-Taylor is hereby GRANTED.

IT IS SO ORDERED.

DATED this 21st day of March, 2016.


William A. Maddox
Senior District Court Judge

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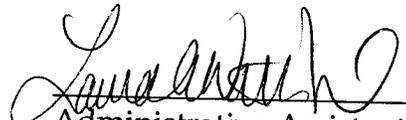
CERTIFICATE OF MAILING

Pursuant to NRCP 5(b), I certify that I am an employee of the Second Judicial District Court and that on the 21 day of March 2016, I deposited for mailing, first class postage pre-paid, at Reno, Nevada, a true and correct copy of the foregoing document addressed to the following and I electronically filed the foregoing with the Clerk of the Court System which will send a notice of electronic filing to the following:

Lee Elkins, Esq.

Jenna Garcia, Esq.

Tyler Elcano, Esq.


Administrative Assistant

1 2540
CHRISTOPHER J. HICKS
2 District Attorney
Tyler M. Elcano, DDA
3 Bar Number: 10578
P.O. Box 11130
4 Reno, Nevada 89520-3083
(775) 337-5700
5 Attorneys for: Washoe County Department
Of Social Services
6 **IN THE FAMILY DIVISION**
7 **OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
8 **IN AND FOR THE COUNTY OF WASHOE**

9 IN THE MATTER OF THE PARENTAL)
RIGHTS AS TO:)
10)
ROBERTO TAYLOR,)
11 KAYLEIGH GUERRERO-TAYLOR,) Case No. FV14-03897
NATHAN HUNT-TAYLOR, AND)
12 ETHAN HUNT-TAYLOR,) Dept. No. 2
)
13 MINOR CHILDREN.)
)

14 NOTICE OF ENTRY OF ORDER

15
16 TO: Jacqueline Guerrero; Lee Elkins, Deputy Public Defender for Ms.
Guerrero; Robert Hunt-Taylor; Jenna Garcia for Mr. Hunt-Taylor:

17
18 PLEASE TAKE NOTICE that an **ORDER TERMIMATING PARENTAL RIGHTS** was
19 entered in the above entitled matter on 21ST day of March, 2016, copy
20 of which is attached hereto.

21 Dated this 21st day of March, 2016.

22 CHRISTOPHER J. HICKS
Washoe County District Attorney

23 By: /s/ Tyler M. Elcano
24 Tyler M. Elcano
Deputy District Attorney
25 Attorney for Petitioner
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CERTIFICATE OF SERVICE BY MAIL

I certify that I am an employee of the Office of the District Attorney of Washoe County, over the age of 21 years and not a party to nor interested in the within action. On the 21st day of March, 2016, I electronically filed the foregoing with the Clerk of the Court system which will send a notice of electronic filing to following:

- Lee Elkins, Deputy Public Defender
- Jenna Garcia, Deputy Alternate Public Defender

AFFIRMATION PURSUANT TO NRS 239b.030

The undersigned does hereby affirm that the preceding document does not contain the social security number of any person.

/s/ L. Todd
L. Todd

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**IN THE FAMILY DIVISION
OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE**

-o0o-

In the Matter of

Roberto Taylor, DOB 06-15-2007
Kayleigh Guerrero-Taylor, DOB 02-13-2010
Nathan Hunt-Taylor, DOB 06-29-2011 and
Ethan Hunt-Taylor, DOB 01-01-2014

Case No. FV 14-03897

Dept. No. D2

Minor Children.

ORDER TERMINATING PARENTAL RIGHTS

This matter came before the Court pursuant to an Amended Petition to Terminate Parental Rights filed on July 17, 2015. A trial was held in this matter on August 31 through September 4, 2015 and then on September 15, 2015. Post trial briefing was completed on or around October 19, 2016. Washoe County Social Services was represented by Washoe County Deputy District Attorney Tyler M. Elcano at all times. Jacqueline Guerrero was present and represented by Washoe County Deputy Public Defender Lee Elkins at all times.

The four children who are the subject of this Petition are Roberto Taylor ("Roberto"), whose date of birth is June 15, 2007; Kayleigh Guerrero Taylor ("Kayleigh"), whose date of birth is February 13, 2010; Nathan Hunt-Taylor ("Nathan"), whose date of birth is June 29, 2011; and Ethan Hunt-Taylor ("Ethan"), whose date of birth is January 1, 2014.

The children's biological mother is Jacquelyn Guerrero. The children's legal father

1 is Robert Hunt-Taylor.

2 After a review of the pleadings, testimony and evidence presented at trial, the
3 Court GRANTS the Amended Petition for Termination of Parental Rights.

4 **THE AMENDED PETITION FOR TERMINATION OF PARENTAL RIGHTS**

5 The Petitioner's assert in their Amended Petition for Termination of Parental
6 Rights that grounds exist for terminating the parental rights of Ms. Guerrero, the mother
7 of Roberto, Kayleigh, Nathan, and Ethan, and Mr. Hunt-Taylor, the father of Roberto,
8 Kayleigh, Nathan, and Ethan on the grounds that:

9 1. Pursuant to NRS 128.105(1), the best interests of Roberto, Kayleigh,
10 Nathan, and Ethan will be served by the termination of the parental rights of their
11 biological parents.

12 2. Pursuant to NRS 128.105(2)(b), Roberto, Rayleigh, Nathan, and Ethan are
13 neglected children as Ms. Guerrero and Mr. Hunt-Taylor have, by reasons of their faults
14 or habits, neglected and refused to provide the children with proper parental care. Ms.
15 Guerrero and Mr. Hunt-Taylor have neglected or refused to provide proper or necessary
16 subsistence, education, medical or surgical care, or other care necessary for the health,
17 morals, or well-being of Roberto, Kayleigh, Nathan, and Ethan.

18 3. Pursuant to NRS 128.105(2)(c), Ms. Guerrero and Mr. Hunt-Taylor are
19 unfit parents in that, by reason of their faults or habits or conduct toward Roberto,
20 Kayleigh, Nathan, and/or Ethan or other persons, they have failed to provide the children
21 with proper care, guidance, and support.

22 4. Pursuant to NRS 128.105(2)(d), Ms. Guerrero and Mr. Hunt-Taylor have
23 failed to adjust, in that they have been unable or unwilling within a reasonable period of
24 time to remedy substantially conditions which led to the out-of-home placement of
25 Roberto, Kayleigh, Nathan, and Ethan, notwithstanding reasonable and appropriate
26 efforts on the part of WCDSS to return the children.

27 5. Pursuant to NRS 128.105(2)(e), there is risk of serious physical, mental or
28 emotional injury to Roberto, Kayleigh, Nathan, and Ethan if they are returned to, or

1 remains in the home of Ms. Guerrero and/or Mr. Hunt-Taylor.

2 6. Pursuant to NRS 128.105(2)(f), there have been only token efforts or no
3 efforts by Ms. Guerrero and Mr. Hunt-Taylor:

4 (1) To support or communicate with the children;

5 (2) To prevent neglect of the children;

6 (3) To avoid being an unfit parent;

7 (4) To eliminate the risk of serious physical, mental or emotional injury to
8 the children.

9 7. Roberto, Kayleigh, and Nathan have been placed outside of their home and
10 in care for 26 months out of the last 26 months. Ethan has been placed outside of his
11 home for ten out of the last ten months. Therefore, the presumptions in NRS 128.109(1)
12 and (2) apply to Roberto Kayleigh, and Nathan and may apply to Ethan at the time of
13 trial.

14 **STATEMENT OF PROCEEDINGS**

15 Roberto, Kayleigh, and Nathan were removed from parental custody on or about
16 April 19, 2013, pursuant to 432B proceedings in the underlying dependency matter.

17 Ethan was removed from parental custody on or about September 11, 2014, pursuant to
18 432B proceedings in the underlying dependency case. The children presently reside in
19 family foster care with Sandra Matute ("Ms. Matute").

20 The children's biological mother is Jacquelyn Guerrero. The children's legal father
21 is Robert Hunt-Taylor.

22 A succinct and thorough summary of the proceedings in this case up until the time
23 of trial is set forth in the Petitioner's Trial Brief, Pages 3-26 and is adopted by this Court
24 in this Order Terminating Parental Rights.

25 **TRIAL**

26 The following persons testified at the trial in this matter:

27 1. Andrea Menesini, a Social Worker with the Washoe County Department of
28 Social Services.

- 1 2. Alicia Kraft, a Social Worker with the Washoe County Department of
2 Social Services.
- 3 3. Erika Meszaros, a Worker with the Emergency Response Unit of the
4 Washoe County Department of Social Services.
- 5 4. Denise Tyre, a Social Worker with the Washoe County Department of
6 Social Services.
- 7 5. Suzanne Aberasturi, Ph.D., a psychologist specializing in neuropsychology.
- 8 6. Amanda Buttacavoli, a Licensed Clinical Social Worker working as an
9 independent contractor with Healing Minds.
- 10 7. Rocio Lopez, a Social Worker with the Washoe County Department of
11 Social Services.
- 12 8. Deken Gossett, a Marriage and Family Therapist intern working with
13 Clover Community Counseling.
- 14 9. Belinda Boan, a Family Nurse Practitioner, working with Sequel Family
15 Alliance.
- 16 10. Brianna Carter, a psychotherapist and a Marriage and Family Counselor
17 employed by Great Basin Behavioral Health and Wellness.
- 18 11. Julius Rogina, Ph.D., a clinical and forensic phytologist.
- 19 12. Sandra Matute, the foster parent who has custody of the subject children.
- 20 13. Dori Orlich, a Licensed Clinical Social Worker working independently.
- 21 14. Cassondra Pasley, a supervisor at the Children's Cabinet.
- 22 15. Malia Seronio, a Permanency Worker with the Washoe County Department
23 of Social Services.
- 24 16. Cynthia Heldenbrand, a Social Worker supervisor at the Nevada State
25 Welfare Office.
- 26 17. Maribel Stalker and Troy Stalker, co-tenants with Jacqueline Guerrero.
- 27 18. Malia Seronio, a Social Worker with the Washoe County Department of
28 Social Services.

1 has been placed outside his home pursuant to NRS chapter 432B, and "has resided outside
2 of his home pursuant to that placement for 14 months of any 20 consecutive months, the
3 best interests of the child must be presumed to be served by the termination of parental
4 rights."

5 Additionally, NRS 128.005 sets forth factors to be considered in determining the
6 best interests of the child. Specifically, NRS 128.005(2)(c) provides that the "continuing
7 needs of a child for proper physical, mental and emotional growth and development are
8 the decisive considerations in proceedings for termination of parental rights." See *Matter*
9 *of N.J.*, 116 Nev. at 8009 8 P.3d at 132-33 ("These factors allow the district court to
10 consider the distinct facts of each case in deciding whether or not to terminate parental
11 rights.").

12 **B. Parental Fault**

13 In addition to considering the best interests of the child, parental fault must be
14 shown by clear and convincing evidence. NRS 128.105(2) provides that parental fault can
15 be shown by one of the following:

- 16 (a) Abandonment of the child;
 - 17 (b) Neglect of the child;
 - 18 (c) Unfitness of the parent;
 - 19 (d) Failure of parental adjustment;
 - 20 (e) Risk of serious physical, mental or emotional injury to the child if he were
21 returned to, or remains in, the home of his parent or parents;
 - 22 (f) Only token efforts by the parent or parents: (1) To support or communicate with
23 the child; (2) To prevent neglect of the child; (3) To avoid treating an unfit parent;
24 or (4) To eliminate the risk of serious physical, mental or emotional injury to the
25 child; or
 - 26 (g) With respect to termination of the parental rights of one parent, the
27 abandonment by that parent.
- 28

1 I. Neglect (NRS 128.105(b))

2 A neglected child is defined as a child:

- 3 1. Who lacks the proper parental care by reason of the fault or
4 habits of his or her parent, guardian or custodian;
- 5 2. Whose parent, guardian or custodian neglects or refuses to
6 provide proper or necessary subsistence, education, medical or surgical
7 care, or other care necessary for the child's health, morals or well-being;
- 8 3. Whose parent, guardian or custodian neglects or refuses to
9 provide the special care made necessary by the child's physical or mental
10 condition;
- 11 4. Who is found in a disreputable place, or who is permitted to
12 associate with vagrants or vicious or immoral persons; or
- 13 5. Who engages or is in a situation dangerous to life or limb, or
14 injurious to health or morals of the child or others, and the parent's neglect
15 need not be willful.

16 In determining neglect, the Court shall consider, without limitation, repeated or
17 continuous failure by the parent, although physically and financially able, to provide the
18 child with adequate food, clothing, shelter, education or other care and control necessary
19 for the child's physical, mental and emotional health and development" NRS
20 128.106(5). "[N]eglect must be serious and persistent and sufficiently harmful to the child
21 so as to mandate a forfeiture of parental rights. In such a case a parent may be adjudged to
22 be unsuitable to maintain the parental relationship and, therefore, to deserve to lose it."
23 *Champagne v. Welfare Division*, 100 Jlev. 640, 648, 691 P.2d 849, 855 (1984),
24 overruled on other grounds and superseded by statute on other grounds as recognized by
25 *Matter of Parental Rights as to N.J.*, 116 Nev. '90, 8 P.3d 126, (2000).

26 The level of neglect necessary to satisfy the statute has been identified and
27 discussed by the Nevada Supreme Court. *Cf. Matter of Parental Rights*
28 *as to D.R.H.*, 120 Nev. 422, 429, 92 P.3d 1230, 1234 (2004) (children were neglected

1 where parent used drugs, there was domestic violence in the home while the children
2 were present, and the children were unsupervised, dirty, and injured while in their parent's
3 care); *In the Matter of the Parental Rights as to N.J.*, 125 Nev. 835, 221 P.3d at 1262,
4 (2009), (child was neglected where mother had ongoing addiction to drugs, missed half of
5 the scheduled visitations during the first 17 months of the child's life, and never provided
6 any financial assistance).

7 II. Unfitness of the Parent (NRS 128.105(c))

8 An unfit parent is defined as “any parent of a child who, by reason of the parent’s
9 fault or habit or conduct toward the child or other persons, fails to provide such child with
10 proper care, guidance and support.” Similar to neglect, the considerations enumerated in
11 NRS 128.106 shall also be taken into account to determine if an individual is an unfit
12 parent.

13 In accordance with NRS 128.106(1), to determine if a parent is unfit, the Court
14 must consider “[e]motional illness, mental illness or mental deficiency of the parent
15 which renders the parent consistently unable to care for the immediate and continuing
16 physical or psychological needs of the child for extended periods of time.” Additionally,
17 when determining if a parent is unfit, the court shall consider the “[r]epeated or
18 continuous failure by the parent, although physically and financially able, to provide the
19 child with adequate food, clothing, shelter, education or other care and control necessary
20 for the child’s physical, mental, and emotional health and development” NRS
21 128.106(5). Finally, the court shall consider the “[i]nability of appropriate public or
22 private agencies to reunite the family despite reasonable efforts on the part of the
23 agencies” when determining if a parent is unfit. NRS 128.106(8).

24 Unfitness generally includes continued drug use, criminal activity, domestic
25 violence, or an overall inability to provide for the child's 'physical, mental or emotional
26 health and development.” (Citation omitted)

27 III. Parental Adjustment (NRS 128.105(d))

28 Failure of parental adjustment occurs when a parent is unable or unwilling to

1 correct the circumstances, conduct or conditions which led to the placement of a child
2 outside the home. See NRS 128.0126.

3 NRS 128.109(1)(b) provides that if a parent fails to comply substantially with the
4 case plan within six months after its inception, there is a presumption that the parent has
5 failed to adjust. The Nevada Supreme Court, however, has stated that "[t]he parent . . .
6 must be shown to be at fault in some manner . . . [and] cannot be judged unsuitable by
7 reason of failure to comply with requirements and plans that are . . . impossible . . . to
8 abide by." *Champagne v. Welfare Division*, 100 Nev. 640, 652, 691 P.2d 849, 857
9 (1984), overruled on other grounds by *Matter of N.J.*, 116 Nev. 790, 8 P.3d 126.
10 Moreover, the Court has recognized that failure of parental adjustment as a basis for
11 termination is "fraught with difficulties and must be applied with caution." *Matter of*
12 *Parental Rights of Montgomery*, 112 Nev. 719, 729, 917 P.2d 949, 956 (1996) (quoting
13 *Champagne*, 100 Nev. at 652, 691 P.2d at 857), superseded by statute on other grounds
14 as recognized by *Matter of N.J.*, 116 Nev. 790, 8 P.3d 126.

15 IV. Risk of serious physical, mental or emotional injury to the child if
16 the child were returned to, or remains in, the home of his or her parent or parents
17 (NRS 128.105(e))

18 In interpreting this provision, the Nevada Supreme Court has stated as follows:
19 "[A]buse of a child may or may not render a parent unsuitable to be a parent . . . Such a
20 risk may be mitigated, and a child may be safely returned to the home; or the risk may be
21 of such magnitude and persistency as to render the parent unsuitable and justify forfeiture
22 of parental rights." *Champagne v. Welfare Division*, 100 Nev. at 649, 691 P.2d at 855,
23 overruled on other grounds and superseded by statute on other grounds as recognized by
24 *Matter of Parental Rights as to NJ.*, 116 Nev. 790, 8 P.3d 126, (2000).

25 V. Token Efforts (NRS 128.105(f))

26 NRS 128.109(1)(a) provides that "[i]f the child has resided outside of his home
27 pursuant to [chapter 432B of NRS] for 14 months of any 20 consecutive months, it must
28 be presumed that the parent or parents have demonstrated only token efforts to care for

1 the child as set forth in paragraph (f) of subsection 2 of NRS 128.105.”

2 **C. Additional findings which may be necessary**

3 **I. Efforts toward reunification**

4 Because the children are not currently in their mother's custody, NRS 128.107
5 requires this Court to consider:

6 1. The services provided or offered to the parent or parents to facilitate a
7 reunion with the child.

8 2. The physical, mental or emotional condition and needs of the child and the
9 child's desires regarding the termination, if the court determines the child is of sufficient
10 capacity to express his or her desires.

11 3. The effort the parent or parents have made to adjust their circumstances,
12 conduct or conditions to make it in the child's best interest to return the child to his or her
13 home after a reasonable length of time, including but not limited to:

14 (a) The payment of a reasonable portion of substitute physical care and
15 maintenance, if financially able;

16 (b) The maintenance of regular visitation or other contact with the children
17 which was designed and carried out in a plan to reunite the child with the
18 parent or parents; and

19 (c) The maintenance of regular contact and communication with the
20 custodian of the child.

21 4. Whether additional services would be likely to bring about lasting parental
22 adjustment enabling a return of the child to the parent or parents within a predictable
23 period.

24 **FINDINGS AND CONCLUSIONS**

25 1. Roberto, Kayleigh, and Nathan were removed from parental custody by the
26 Washoe County Department of Social Services on April 19, 2013, and, pursuant to the
27 underlying NRS 432B dependency matter, have remained in the care and custody of
28 Washoe County Department of Social Services. They have therefore been placed outside

1 of their home in the care and custody of Washoe County Department of Social Services in
2 excess of 28 of the last 28 consecutive months.

3 2. The presumptions in NRS 128.109(1)(a) and 128.109(2) apply. Pursuant to
4 NRS 128.109(1)(a), it is presumed Ms. Guerrero has demonstrated only token efforts to
5 care for Roberto, Kayleigh, and Nathan pursuant to NRS 128.105(f)(2). Parental fault is
6 established pursuant to NRS 128.105(2)(f). Pursuant to NRS 128.109(2), it is presumed
7 the best interests of Roberto, Kayleigh, and Nathan are served by the termination of Ms.
8 Guerrero's parental rights. The Court finds that Ms. Guerrero did not overcome the NRS
9 128.109 presumption and therefore, the Court finds it is in the best interest of Roberto,
10 Kayleigh, and Nathan that Ms. Guerrero's parental rights are terminated.

11 3. Petitioner, Washoe County Department of Social Services, has proven, by
12 clear and convincing evidence the existence of parental fault on the part of Ms. Guerrero.
13 Ms. Guerrero has failed to have a stable income. She has failed to have a stable and safe
14 place for the children to live. Finally, she has not addressed her own severe emotional
15 and mental illnesses. Further, clear and convincing evidence exists which demonstrates
16 that the best interests of the Roberto, Kayleigh, Nathan and Ethan are served by
17 termination of Ms. Guerrero's parental rights.

18 3. Ms. Guerrero has made efforts to assume all of her responsibilities as a
19 parent but falls short in each of the important areas required. It is suggested that poverty
20 is what has caused her failure to do what is necessary to reunify with her children. That is
21 not all the truth. She has not consistently remained employed enough to support the
22 children financially. She has not been able to maintain a stable and safe place for the
23 children to live. Finally, she has not persisted in addressing here own emotional and
24 mental illnesses. The Court is uncertain as to whether or not she can achieve any of the
25 above. Additionally, it appears that her conduct has imperiled her opportunity to receive
26 food stamps and her right to receive Temporary Aid for Needy Families is running out
27 which means that even with government assistance, she would not be able to provide for
28 her children. If the Court could place the children in suspended animation and hope that

1 Ms. Guerrero could make substantial changes in a short time, it would. However, the
2 children lives are moving on and the Court cannot stop that. No time remains in order to
3 give Ms. Guerrero time to do what she has not done over that last several months and
4 years. If the Roberto, Kayleigh, Nathan and Ethan were returned to her care at this time,
5 she has no means to support them and no means with which to provide a stable and safe
6 place for them to live. The children would be at an increased and untenable risk of
7 re-removal over an inability to provide even for their basic needs.

8 4. Roberto, Kayleigh, Nathan and Ethan are thriving in their potential adoptive
9 placement. Family bonds are developing and they are demonstrating an abiding sense of
10 safety, consistency, bonding and attachment. Their best interests are served by
11 termination of their mother's parental rights and the opportunity to remain in their current
12 home.

13 5. Washoe County Department of Social Services has provided reasonable
14 efforts to prevent the out of home placement of Roberto, Kayleigh, Nathan and Ethan.
15 From the time of removal in April 19, 2014 and September 11, 2014, and since, Washoe
16 County Department of Social Services has attempted to engage Ms. Guerrero and support
17 her ability to care for all of her children. Services were offered to her in various ways
18 including referral to the Children's Cabinet. She was given counseling support to address
19 her emotional and mental problems. Washoe County Department of Social Services made
20 repeated attempts, across multiple providers and modalities, to engage Ms. Guerrero in
21 services. Ms. Guerrero made some efforts to avail herself of the services provided to her
22 but invariably failed to completely follow through. Her failure to follow through as much
23 as any other fact frustrated any chance of reunification.

24 The perfect is the enemy of good! The Court has reviewed the more than 1200
25 pages in the Court file, the transcript of the trial in this matter and the pleadings filed by
26 counsel both before and after the trial. It is extremely difficult to terminate a person's
27 rights to their children. It is unimaginable that anyone would do so with less than clear
28 and convincing evidence that termination was in the best interest of the children. The

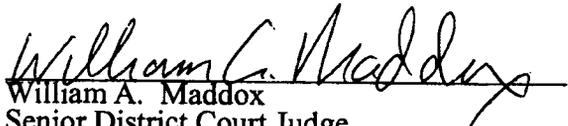
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Court has a great deal of sympathy for Jacquelyn Guerrero. She has made some effort but again when necessary fails to follow through to accomplish necessary tasks. A minimal level must be achieved, not perfection, but a minimal level must be achieved in order to provide children with the basic necessities. Ms. Guerrero has not achieved that level over the course of this case and the Court is not convinced she could in the future.

For all of the reasons stated above, the Petition to Terminate the Parental Rights of Jacquelyn Guerrero to Roberto Taylor, Kayleigh Guerrero Taylor, Nathan Hunt-Taylor and Ethan Hunt-Taylor is hereby GRANTED.

IT IS SO ORDERED.

DATED this 21st day of March, 2016.


William A. Maddox
Senior District Court Judge

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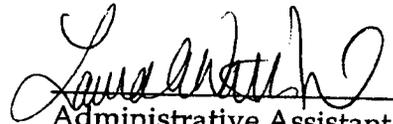
CERTIFICATE OF MAILING

Pursuant to NRCP 5(b), I certify that I am an employee of the Second Judicial District Court and that on the 21 day of March 2016, I deposited for mailing, first class postage pre-paid, at Reno, Nevada, a true and correct copy of the foregoing document addressed to the following and I electronically filed the foregoing with the Clerk of the Court System which will send a notice of electronic filing to the following:

Lee Elkins, Esq.

Jenna Garcia, Esq.

Tyler Elcano, Esq.


Administrative Assistant

CASE NO. FV14-03897 TITLE: TERM: R. TAYLOR, K. GUERRERO-TAYLOR, N. HUNT-TAYLOR
(D5)

DATE, JUDGE
OFFICERS OF
COURT
PRESENT

APPEARANCES - HEARING

TERMINATION OF PARENTAL RIGHTS

1-15-2015

HONORABLE
EGAN WALKER

DEPT. 2

T. GREENWELL
Court Clerk

CD RECORD

BAILIFF
C. TURNER

Page 1 of 1

Tyler Elcano, Deputy District Attorney, was present on behalf of the Petitioner, Washoe County Department of Social Services. Also present was social worker Rocio Lopez. Lee Elkins, Deputy Public Defender, counsel for the Respondent in the related dependency matter was present on behalf of Jacqueline Guerrero, who was also present. Respondent, Robert Hunt-Taylor was also present.

Respondent Hunt-Taylor affirmed his desire to have counsel appointed; he completed the paperwork but has not yet submitted it to the Court.

Respondents were sworn.

Court canvassed Jacqueline Guerrero as to her income and found her to be indigent; counsel appointed.

Court canvassed Robert Hunt-Taylor as to his income and found him to be indigent; counsel appointed.

Counsel Elkins offered his client is denying the Petition.

Court addressed the Respondent, Mr. Hunt-Taylor as to entering a denial on his behalf; the Court addressed the parties regarding maintaining contact with counsel and the social worker.

COURT ORDERED: Denial entered on behalf of Jacqueline Guerrero and Robert Hunt-Taylor. The Public Defender's Office is appointed for Jacqueline Guerrero and Robert Hunt-Taylor. The matter shall be set for mediation and settlement conference.

CASE NO. FV14-03897 TITLE: TERM: R. TAYLOR, K. GUERRERO-TAYLOR, N. HUNT-TAYLOR
(D5)

DATE, JUDGE
OFFICERS OF
COURT
PRESENT

APPEARANCES - HEARING

TERMINATION OF PARENTAL RIGHTS

1-12-2015

**HONORABLE
EGAN WALKER**

DEPT. 2

**T. GREENWELL
Court Clerk**

CD RECORD

**BAILIFF
C. TURNER**

Page 1 of 1

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Code 1350

**IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE**

In the Matter of

Case No. FV14-03897

**Roberto Taylor, DOB 06-15-2007
Kayleigh Guerrero-Taylor, DOB 02-13-2010
Nathan Hunt-Taylor, DOB 06-29-2011 and
Ethan Hunt-Taylor, DOB 01-01-2014**

Dept. No. D2

Minor Children.

_____ /

CERTIFICATE OF CLERK AND TRANSMITTAL – NOTICE OF APPEAL

I certify that I am an employee of the Second Judicial District Court of the State of Nevada, County of Washoe; that on the 19th day of April, 2016, I electronically filed the Notice of Appeal in the above entitled matter to the Nevada Supreme Court.

I further certify that the transmitted record is a true and correct copy of the original pleadings on file with the Second Judicial District Court.

Dated this 19th day of April, 2016

Jacqueline Bryant
Clerk of the Court

By /s/ Yvonne Vilorio
Yvonne Vilorio
Deputy Clerk