IN THE SUPREME COURT OF THE STATE OF NEVADA

PHILLIP R.; AND REGINA R.
Petitioners,
vs.
THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK; AND THE HONORABLE CYNTHIA N. GIULIANI, DISTRICT JUDGE,
Respondents,
and
STEPHANIE R.; JOEY R.; CLARK COUNTY DEPARTMENT OF FAMILY SERVICES; AND E.R., A MINOR,
Real Parties in Interest.

Supreme Court No. 73198
District Court No. J-15-337398-P1

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Elizabeth A. Brown
Clerk of Supreme Court

In the Matter of: E. R., A MINOR.

CLARK COUNTY DEPARTMENT OF FAMILY SERVICES; AND CLARK COUNTY DISTRICT ATTORNEY'S OFFICE
Petitioners,
vs.
THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF CLARK; AND THE HONORABLE CYNTHIA N.GIULIANI, DISTRICT JUDGE,
Respondents,
and
PHILLIP R.; REGINA R.; STEPHANIE R.; JOEY R.; AND E.R., A MINOR
Real Parties in Interest.

Supreme Court No. 73272
District Court No. J-15-337398-P1

REPLY TO RESPONDENTS' ANSWERS TO CONSOLIDATED PETITIONS FOR WRIT OF MANDAMUS

I. STATEMENT OF THE FACTS

In addition to the facts outlined in its original petition, the State provides the following additional information. On or about April 24, 2017, Nellie Saez ("Saez"), natural mother of E.R., gave birth to O.R., E.R.'s half sibling. O.R. was placed in protective custody. On or about June 22, 2017, a child welfare petition was substantiated against Ms. Saez after a prove up hearing and the Court took wardship of O.R. O.R. was placed with E.R. under the care and supervision of the Riveras. However, on July 3, 2017, the Court ordered that O.R. be separated from E.R. and placed with the Roziers in Georgia. Counsel for the Roziers and for E.R. did not object to the placement. (*See* Petitioners Affidavit in support of Reply).

II. ARGUMENT

A. TERMINATION OF PARENTAL RIGHTS ELIMINATES THE FAMILIAL AND SIBLING PRESUMPTION UNDER NRS 432B.550. THE GOVERNING STATUTE IS NRS 128.110

Respondents argue that the adoption of the child, not the termination of parental rights, severs the familial preference and sibling presumption under NRS 432B. This is contrary to the standard clearly set forth in Bopp v. Lino, 110 Nev. 1246, 1247, 885 P.2d 559, 560 (1994). In Bopp, this Court held that once a child is available for adoption, certain relatives retain rights to the child only where statute allows. Such rights are not guaranteed but require that the relatives take proactive

measures to obtain them. Id. at 1251.

NRS 432B.550 does not address placement where a child is free for adoption. However, the plain language of NRS 128.110 clearly governs said placement of the child where parental rights have been terminated.

NRS 128.110(1) states in pertinent part:

> Upon finding grounds for the termination of parental rights ... the court shall make a written order... placing the custody and control of the child in some person or agency qualified by the laws of this State to provide services and care to children."

NRS 128.110(2) states:

> If the child is placed in the custody and control of a person or agency qualified by the laws of this State to receive children for placement, the person or agency, in seeking to place the child:
> (a) **May give preference** to the placement of the child with any person related within the fifth degree of consanguinity to the child whom the person or agency finds suitable and able to provide proper care and guidance for the child, regardless of whether the relative resides within this State.
> (b) **Shall, if practicable, give preference** to the placement of the child together with his or her siblings. Any search for a relative with whom to place a child pursuant to this subsection must be completed within 1 year after the initial placement of the child outside of his or her home.

Therefore, once parental rights are terminated, the Court is required to place the child with a person or agency. The agency: (1) must complete the search for relatives within one year after the initial placement of the child outside of the home; (2) the agency has discretion to place the child with relatives; and, (3) the agency must, **if practicable**, **prefer** to place the child with her siblings.

In this case, placement was determined by DFS pursuant to statute. DFS concluded its search for E.R.'s family members within the one year period. DFS was not required to consider or prefer the Roziers as a placement option. Further, DFS could determine if placing E.R. with a sibling was in her best interest and if placement was practicable. DFS determined it was not in her best interest, given the child's bonding with the Riveras and the long term trauma E.R. would experience from a fourth removal as discussed below.

Respondents argue that the familial preference survives pursuant to NRS 128.110(2). This misstates the plain reading of the statute. Once the parental rights were terminated, the DFS had the option of preferring the Roziers, but it was not mandatory.

Respondents argue that when DFS notified the court of the Roziers' interest, DFS acknowledged that the preference still existed and that it abrogated its right to determine placement. Respondents cite to no law supporting this assertion. Furthermore, DFS apprised the Court of the situation as a courtesy only.

Respondents further claim that the State's interpretation of Bopp would violate public policy as it would result in adoptions wherein family was never considered. This is inaccurate as NRS 128.110 governs DFS and sets forth the policy of placement after parental rights are terminated.

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B. THE DISTRICT COURT ABUSED ITS DISCRETION BY UPHOLDING THE HEARING MASTER'S FINDINGS OF FACT AND RECOMMENDATION AS THEY WERE CLEARLY ERRONEOUS

1. Assuming 432B applies, the District Court did not apply the proper standard

Respondents argue that the District Court and the Hearing Master applied the correct standard in this matter. This contradicts the Hearing Master's recommendation which the District Court adopted. The Hearing Master's Recommendation clearly states, "the courts and legislature have determined that when comparing bonding with biological, family connection, family connection is the overriding consideration and the family is where the child should be placed, despite the trauma that Esther will experience with a fourth removal." Petitioner's Appendix "PA" 33-34.

The Hearing Master made no findings as to the best interest of the child. Id. Instead he used a standard of familial preference versus bonding with no actual citation to statute or case law. Furthermore, the District Court found that the Hearing Master considered the best interest of the child. However, the District Court could provide no evidence or grounds for the best interest standard and simply referred to the Hearing Master's finding that the standard was the supremacy of biological connection over bonding. PA 119.

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Additionally, during the objection hearing, the State asked the District Court for specific grounds on which the best interest of the child was determined. The Court could not provide that information and then refused to do so. Petitioner's Supplement to Appendix "SA" 130-131, 138. As such, the decision is an abuse of discretion.

Respondents argue that it was the intent of the Hearing Master to use a best interest standard and that he made extensive best interest findings, but the State failed to make the correct findings as it was asked to draft the recommendation. This argument is without factual basis. The State made significant argument as to the proper standard but the court, in its discretion, chose another standard. SA 353-361. The Hearing Master made no reference to the best interest of the child in his findings. SA 374-384. Further, the State does not make the necessary findings for the court.

The State drafted the recommendation based on the findings of the Hearing Master at the hearing (much of it verbatim) and submitted it to the Hearing Master for his signature. SA 374-384. The Hearing Master approved the recommendation and the District Court adopted the recommendation. PA 34,119. By failing to use the appropriate standard as set forth by this Court, the District Court abused its discretion.

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Finally, supposing as the parties argue, that the Hearing Master was making a best interest finding in which he was ultimately left to consider the biological connection compared to the "incredible bonding" E.R. experienced with the Riveras and the "trauma E.R. will experience" with another removal, the Hearing Master failed to make any specific findings as to how the biological connection was actually in E.R.'s best interest. SA 374-384.

Given there was no evidence in favor of the biological connection, this finding could not have been made. As Ms. Rozier specifically testified, "There is no doubt in my mind that they [the Riveras] can provide the same life... **We can equally give her the same life, the same love, the same care... There's no doubt about that.**" SA 202. The State would note that aside from pointing to the statutory preferences, Respondents fail to cite to any evidence presented at the placement hearing which would support their claim that placement with the Roziers is in E.R.'s best interest.

2. **Roziers did not demonstrate a reasonable excuse for delay.**

Respondents argue that the Roziers had no actual notice. However, the evidence demonstrates that the Roziers knew or should have known that E.R. had been removed. Ms. Rozier knew of E.R.'s birth. SA 166-167. Ms. Rozier testified that her family was close. SA 204. She had known Saez her whole life. SA 163. She had contact with E.R.'s half sibling, Ms. Tellez, who clearly knew that E.R.

was removed as she spoke with DFS. SA 164-165 She was close with her maternal uncle "Tony" in Florida who had access to information regarding the removal as he was aware that both E.R. and a half sibling had been removed. SA 168, 171-172. Further, at the time of the hearing, Ms. Rozier was able to contact Saez by means of communicating with family members. SA 167-169.

Given that Ms. Rozier's family is close, her family had information as to the removals, and Ms. Rozier has access to Saez, it is unreasonable to believe that she was not advised of the removal until sixteen months later.

Respondents argue that the standard set forth by this Court requires that family members have actual notice of a child's removal. This is contrary to the child's best interest and the State would ask this Court to modify the standard set forth in Clark County Dist. Atty. v. Eighth Judicial Dist. Court to require that relatives who reasonably should have known of a child's removal provide a reasonable excuse for the delay. (123 Nev. 337, 346, 167 P.3d 922, 928 (2007)

In this case, Ms. Rozier testified that she knew Saez had substance abuse and mental health issues and chronic homelessness. SA 173, 178. She testified that Saez had maintained this lifestyle prior to E.R.'s birth and that Saez was not stable. SA 173, 178. **Rozier admitted that when she learned of E.R.'s removal "it wasn't surprising considering what we know about [Saez]."** SA 174. As such, Ms. Rozier should have known that E.R. was either in danger or had been

removed; however, Ms. Rozier did not attempt to contact Saez about the child until sixteen months later.

Furthermore, when questioned by DFS as to the delay in coming forward, Ms. Rozier was not able to provide a clear answer to the question. SA 232-233.

It is clearly not excusable delay to remain willfully ignorant of a child's removal when a relative should reasonably know that a child has likely been removed or is likely in danger. Nor is it in the best interest of the child to place the child with a family member who remains willfully ignorant, knowing the child may be in harms way.

3. **DFS made reasonable efforts to locate E.R.'s relatives**

Respondents argue that the District Court found the Roziers had a reasonable excuse for delay as DFS never tried to find the Roziers or any family members. This is contrary to the facts and the District Court and counsel seek to place an unreasonable burden on DFS in locating family members.

DFS does not have access to genealogical records to find a child's relatives. DFS can only rely on family members and limited information provided by governmental records in order to locate extended relatives. DFS performed two diligent searches using the resources available to it which located E.R.'s half siblings. DFS sent notice to the relatives and they did not respond. DFS spoke with Saez who was only able to provide the first name of a half sibling. DFS spoke

with Ms. Tellez, E.R.'s half sibling, but Ms. Tellez did not disclose information about any other relatives.[1] SA 229-231.

The Roziers and E.R. are separated by five degrees of consanguinity, making them the last extend relatives considered for placement under the statute. SA 163. It is unreasonable for the court or for counsel to expect DFS to know of such distant relatives.

The District Court and Respondents assert that the record indicates that DFS never asked E.R.'s adult sibling about any other relatives, therefore DFS did not do so. This is assumption that is not warranted.

The notes provided by the social worker do not indicate whether she asked Ms. Tellez about other relatives; however, the District Court did not allow the worker to testify as to whether she asked about additional relatives. SA 123. The District Court simply assumed the worker had not done so. Therefore, the Court abused its discretion in finding that DFS should have contacted the Roziers earlier.

4. **It is not in E.R.'s best interest to be placed with the Roziers**

Respondents argue that it is in E.R.'s best interest to be placed with the Roziers for the following reasons. The State will list each argument it identified

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[1] Both the Hearing Master and the District Court claimed that DFS should have contacted the Roziers sooner as DFS had contact with Ms. Tellez and Ms. Tellez had contact with Saez. This assumes that DFS did not ask Ms. Tellez about possible relative placements and that Ms. Tellez would be forthcoming with the information.

from the Respondents' answers and will respond.

(1) The first with the ability to adopt should not automatically be granted placement for adoption

The State agrees. The best interest of the child governs placement.

(2) DFS refused the Roziers multiple requests for visitation

This is contrary to the facts and Ms Rozier's own testimony where she testified that **she was allowed visitation from October 2016 to February 2017 but chose not to visit E.R.** Given the lack of interest in visiting E.R., placement with the Roziers is clearly not in E.R.'s best interest. SA 185-186, 233-234.

(3) The Roziers were ignored

No evidence is cited as to how the Roziers were ignored. Ms. Rozier and DFS were in consistent contact through October 2016 to the date of the hearing. DFS submitted the ICPC soon after speaking with Ms. Rozier. Ms. Rozier testified as to the consistent contact with DFS. SA 186.This matter came before the court because DFS notified the court of the situation.

(4) The Hearing Master found that, all things being equal, it was in E.R.'s best interest to be placed with family

Respondents argue that the Hearing Master found that, all things being equal, it is in the E.R's best interest to be placed with family. This misrepresents the Hearing Master's findings and demonstrates the abuse of discretion in this matter.

The Hearing Master found both parties were able to care for E.R. but that the central issue was the "incredible" bonding E.R. had with the Riveras and the biological connection between the Roziers and E.R. Therefore, all things are not equal in this case. Instead, there is uncontroverted evidence as to the "incredible" bonding with the Riveras and the trauma E.R. will experience with removal (which the Hearing Master actually found) and there is no evidence as to how the biological connection is in the best interest of the child. PA 32-34.

(5) The State asserts that the Roziers must prove that change of placement would improve E.R.'s quality of life

The State has never made this assertion. The standard is the best interest of the child.

(6) E.R.'s time with the Riveras and her community do not create a significant enough bond

Respondents fail to cite to any evidence to support their claim. Uncontroverted evidence to the contrary will be presented throughout this reply.

(7) E.R.'s extreme bonding with the Riveras does not outweigh the familial preference.

E.R.'s bonding with the Riveras does outweigh the familial preference as it is not in E.R.'s best interest to severe that bond.

(8) Stability is in E.R.'s best interest

Counsel for E.R. states that, "Stability is obviously in E.R.'s best interest." Counsel asserts that one more move and E.R. will be permanently placed with

relatives and likely with a sibling for the rest of her childhood.

The State agrees that stability is very important in this case; however, counsel fails to cite to any evidence that it is in E.R.'s best interest to undergo one more removal. To the contrary, the uncontroverted evidence at the hearing was that E.R. would be significantly traumatized by a removal as discussed below. Furthermore, counsel cannot claim stability is in E.R.'s best interest, then claim causing instability in E.R.'s life by removing her again is in her best interest.

(9) The trauma E.R. would suffer would be minimal and the trauma minimization plan set forth by the court would resolve the issue

Counsel for the Roziers states "if trauma were certain to occur with E.R. as a result of the removal, **then such a change in placements would not have been ordered**" This assertion is contrary to the Hearing Master's own recommendation. The Hearing Master stated that E.R. was to be placed with the Roziers "despite the trauma that E.R. **will experience** with a fourth removal."[2] PA 32-34.

The uncontroverted evidence at the evidentiary hearing was that a child's foundational building blocks are created during the first two years of life. This time period is when a child builds loving, secure attachments with their caregivers. This time period is the most essential for children. Removal results in trauma including changes in the overall development of the brain and it effects the child's long term

[2] The State would note that the Hearing Master stated that it would not traumatize E.R during the course of the hearing. SA 215.

and short term memory. Removal results in abnormal behaviors, impulse control, increased anxiety, maladaptive behaviors, control issues, aggression, and can increase the risk of criminal behavior. At all costs, the general consensus is that children should not be moved. SA 240-242, 265-267, 270-271.

The uncontroverted evidence showed that a fourth removal for E.R. would cause severe, long term trauma as the child is currently in the bonding period. Evidence showed that E.R. already demonstrates some trauma, even with the previous careful transition from the prior placement. Evidence was that, if moved, one could expect E.R. to have control issues and that she might regress. E.R. may no longer be toilet trained and will probably lose the verbal skills she currently has. Further, negative behaviors would increase such as tantrums. SA 240-242, 265-267, 270-271.

With regard to a possible long term, therapeutic transition, the evidence was that one would still expect to see long term trauma in E.R. SA 273, 300-301.The Court abused its discretion in deciding to implement a transition plan given that it plainly is not in E.R.'s best interest.

Respondents argue that DFS was unsure regarding the trauma. This is in direct conflict with DFS's testimony and the State would direct the Court to the transcripts as cited above.

(10) Evidence regarding the trauma is not credible as it was provided by DFS.

Respondents fail to provide any evidence that would demonstrate that testimony as to trauma was not credible. In fact, the Hearing Master found that E.R. would experience trauma and sought to implement a plan to overcome the trauma. With regard to DFS's credibility, the State would again note that the Hearing Master found DFS inconsistent and therefore not credible **only on the issue of what Ms. Rozier was told regarding placement.**[3] PA 33.

The State would again note that despite the arguments put forward by Respondents, they fail to provide any evidence as to how placement with the Roziers is actually in E.R.'s best interest simply because they are related. Instead, Respondents seek to attack the evidence presented at the hearing demonstrating the best interests of E.R.

C. IT IS NOT IN E.R.'S BEST INTEREST TO BE PLACED WITH HER SIBLING, O.R.

Respondents argue that the State did not overcome the sibling presumption as found in 432B. The State disagrees. Given that O.R. has been placed with the Roziers, the State will now address this issue and would ask this Court to do so as well. First, the State references the governing presumption found in NRS 128.110(2) which states that DFS must prefer placement with a sibling if practicable. Note that the standard is modified to a preference and that the

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[3] This finding will be addressed later in the Reply.

preference is required only if practicable. In this case, it is not in E.R.'s best interest nor is it practicable to place E.R. with O.R. as E.R. is extremely bonded with the Rivera's, E.R. would suffer significant trauma, and E.R.'s adoption by the Riveras is imminent.

Second, assuming the Court finds that the 432B sibling presumption applies, both **the District Court and Respondents have conceded that the sibling presumption has been overcome as they separated O.R. from E.R. in order to place O.R. with the Roziers in Georgia**. In separating O.R. from E.R. without objection, the Court and Respondents inherently concede the presumption does not apply.

Finally, the sibling presumption has been overcome in this matter as removal from the Riveras is not in E.R.'s best interests for the following reasons.

(1) The court found that adoption is in E.R.'s best interest. Had this current issue not arisen, E.R. would have been adopted by the Riveras three months ago.

(2) Uncontroverted evidence presented at the hearing demonstrated that placement with O.R. would do little for E.R.; instead, removal from the Riveras would cause E.R. long term harm.

As discussed above, E.R. would suffer long term trauma if removed from the Riveras. Uncontroverted evidence at the hearing showed that removing E.R. in order to place her with a sibling would provide no significant benefits nor would it reduce the trauma. SA 302-303.Therefore, removing E.R. for the purpose of

placing her with a sibling is not in E.R.'s best interest.

(3) E.R. is extremely bonded to her community and to the Riveras.

The Hearing Master found that E.R. is incredibly bonded to the Riveras. PA 33. Evidence showed that, to E.R., the Riveras are her parents. She has now resided with them for one year, half of her short life time. She refers to them as "mama" and "dada." She is "daddy's little girl." She expresses love and affection to the Riveras which they reciprocate. She is attached to the point of being "clingy". She has a daily routine with the Riveras. They are her emotional and mental support. E.R. is bonded with those in her community. SA 238, 268, 332-336, 342-348. Severing this relationship would not be in E.R.'s best interest.

D. THE TESTIMONY OF DFS WAS NOT INCONSISTENT IN WHAT WAS RELAYED TO THE ROZIERS REGARDING PLACEMENT

The Court abused its discretion in finding that DFS was not consistent in its testimony as to the information conveyed to the Roziers regarding placement. Both the testimony of Ms. Quinlan and Ms. LaMaison and their records make it clear that both DFS employees informed Rozier that the plan was for the Riveras to adopt E.R. Rozier was to be a second option should the adoption not occur. This was not inconsistent. SA 234, 275-276, PA 60-61. Furthermore, during the State's questing of Ms. Rozier as to what DFS had told her and when, the Hearing Master stated it was not relevant and the State discontinued questioning. SA 184.

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E. DFS COMMITTED NO WRONGDOING IN HANDLING THIS MATTER

Respondents re-state the Hearing Master's concern that DFS was not concerned about E.R.'s previous moves. There is no evidence and none is cited by the court or counsel, that would demonstrate DFS was not concerned with E.R.'s multiple removals. To the contrary, DFS testified that they made efforts to prevent the removals. SA 23.5

Respondents argue that DFS mislead the Riveras into believing that they would be able to adopt E.R. from the beginning. Counsel cites to no evidence in which either DFS or the Riveras claimed that the Riveras were promised they would adopt E.R.

Respondents argue that DFS withheld information from the CAP attorney regarding the Riveras. This is not correct. DFS provided its filed court report with the information regarding the Roziers to the CAP attorney for the review hearing held in January, 2017. PA 22-27. DFS also testified that it attempted to contact the CAP attorney regarding the status of the case on several different occasions but was unable to reach him. SA 248.-249. Further, no sworn testimony was given showing that DFS withheld any information.

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Respondents claim that the Roziers were told they could not attend any hearings. This misrepresents the facts. In February, 2017, after Saez's rights were terminated, DFS did inform the Roziers that they could not attend hearings as they were not parties. There is no evidence that the Roziers were prohibited from attending hearings prior to that time. SA 234-235.

Respondents argue that DFS impeded the placement of E.R. with the Riveras and that there was a coordinated effort between the Riveras and DFS to ensure adoption by the Riveras. This completely ignores the reality of this case. DFS could not have placed E.R. with the Roziers in October 2016 until the ICPC was approved pursuant to Nevada law. Upon contact with the Roziers, DFS submitted the ICPC. The ICPC was not approved until March, 2017. Once the ICPC was approved in March, DFS notified the Court of the situation.

Therefore, DFS did not commit any wrongdoing during the course of this case.

III. CONCLUSION

DFS requests that this Honorable Court issue the requested writ by ordering the District Court to vacate its order placing E.R. with the Roziers and ordering

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DFS to continue with the permanency plan of adoption of E.R. by the Riveras as such is in E.R.'s best interests.

DATED this 13th day of September, 2017.

Respectfully submitted,
STEVEN B. WOFLSON
Clark County District Attorney
Nevada Bar #001565

BY _____
TANNER B. SHARP
Deputy District Attorney
Nevada Bar #13018

VERIFICATION

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

TANNER L. SHARP, being first duly sworn, deposes and says:

That he is the Deputy District Attorney acting for STEVEN B. WOLFSON, District Attorney and the Petitioners in the above captioned REPLY; that he has read the foregoing REPLY TO RESPONDENTS' ANSWERS TO CONSOLIDATED PETITIONS FOR WRIT OF MANDAMUS and knows the contents therein and that the same is true and correct to his own knowledge except as to those matters therein set forth on information and belief, and as to those matters, he believes same to be true.

TANNER L. SHARP
Deputy District Attorney

SUBSCRIBED AND SWORN to
before me this 13th day of September, 2017.

ROBERTINA C. RAMOS
Notary Public, State of Nevada
No. 16-3719-1
My Appt. Exp. Sept. 8, 2020

Notary Public in and for said
State and County

CERTIFICATE OF MAILING

I hereby certify that service of the **REPLY TO RESPONDENTS' ANSWERS TO CONSOLIDATED PETITIONS FOR WRIT OF MANDAMUS** was made this 13th day of September, 2017, by depositing a copy in the U.S. Mail, postage pre-paid and addressed to the following:

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