

Fall

OCR updates serve to inform OCR attorneys and other interested professionals of recent court decisions, studies, and current events relating to child advocacy, OCR activities, GAL activities, and resources and events that may be beneficial to you or your clients. Please feel free to email the OCR with any feedback or information that you wish to have posted in the next update.

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OCR NEWSLETTER

Court Opinions

The summaries below highlight aspects of cases relevant to child representation, but they are neither official nor complete court opinions. Decisions may be subject to multiple interpretations, and attorneys should consult with the original decision prior to citing it. The full text of many of the following decisions can be accessed on the Colorado Court of Appeals website, <http://www.courts.state.co.us/coa/coaindex.htm>, or the Colorado Supreme Court website, <http://www.courts.state.co.us/supct/supctcaseannctsindex.htm>. If you are not able to access a decision online, please feel free to contact the OCR's Staff Attorney, Sarah Ehrlich, (303-860-1517, ext. 1), for assistance.

U.S. Supreme Court

Giles v. California, 128 S. Ct. 2678, (2008).— Giles was convicted of first degree murder after shooting his girlfriend, Avie. There was a history of domestic violence between Giles and Avie. Avie had made statements to police three weeks before her death regarding a domestic violence incident where Giles threatened to kill her. The trial court admitted the statements into evidence under a provision of California law that permits out-of-court statements describing the threat of physical injury on a declarant when the declarant is unavailable at trial and the prior statements are trustworthy. Giles was convicted and while awaiting his appeal the US supreme court decided *Crawford v. Washington*. The California Court of Appeals held that admitting Avie's statements at trial did not violate the confrontation clause as construed by *Crawford* because *Crawford* recognized a doctrine of forfeiture by wrongdoing. Forfeiture by wrongdoing applies only when the defendant engages in the wrongdoing that was intended in and resulted in the declarant being unavailable to testify as a witness. Giles forfeited his right to confront Avie because he murdered her and this intentional criminal act made Avie unavailable to testify. The California Supreme Court affirmed. The Supreme Court reversed and remanded Giles' conviction because Justice Scalia found that the doctrine of forfeiture was not established at the time of the founding of the Bill of Rights, therefore the theory of forfeiture by wrongdoing is not a founding-era exception to the confrontation right. The court dissected the history of the doctrine and looked to common law where the rule was only applied when the defendant engaged in conduct that was designed to prevent (by detaining) the witness from testifying. At common law, the exception only applied when the defendant engaged in conduct designed to prevent the witness from testifying, and the manner in which the rule was applied demonstrates that "unconfronted testimony would not be admitted without a showing that the defendant intended to prevent a witness from testifying." When the Supreme Court approved the doctrine in 1997 through the FRE, the comment states "the exception applies only if the defendant has in mind the particular purpose of making the witness available." Editor's note: I included this case because of the implications in cases involving domestic violence. The dissent by Justice Souter notes that domestic violence cases are susceptible to intimidation of the victim to ensure that they will not testify at trial, and the concern remains that the Confrontation Clause may provide the criminal with a windfall.

Colorado Court of Appeals Cases

In the Interest of L.O.L., No. 08CA0402, October 30, 2008—The department filed a motion to terminate parental rights of L.O.L. The court denied the motion. The child, through the GAL appealed the order. The court of appeals first addresses the issue of mootness because the child is now in the mother’s custody, and at the most recent review hearing the parties agreed to keep child with mother. The court agreed with the mother and department that the issue of termination was moot, because child was now residing with mother, and no party believed that the child should not remain with mother. Since no party now sought to terminate parental rights, the decision of the court will have no effect on the case. The court did not address the issues that the GAL raised on appeal: 1) the trial court’s decision to rely on their own experience and not expert testimony; 2) judicial notice of matters not in evidence; 3) abuse of discretion in admitting evidence and ex parte communications with the department of social services; 4) failure to make findings regarding statutory criteria. The court focused on the burden of proof, and reversed as to that issue since the trial court denied the motion to terminate because it did not have evidence to terminate using the “beyond a reasonable doubt,” standard which is the proper standard under the Indian Child Welfare Act (IWCA). The record did not demonstrate the child was a member or eligible to be a member of any tribe, therefore, the trial court should have used the “clear and convincing evidence” standard. Notice was sent out in accordance with ICWA, and no tribe indicated the child was an Indian Child as of the date of the termination hearing. The court of appeals reversed the court’s order as to the ICWA matter.

In re the Matter of the Petition of C.A.O., No. 07CA1033, July 10, 2008 -In re the Matter of the Petition of C.A.O., an indigent, incarcerated father appealed the court’s denial of his request to be appointed counsel when the child’s stepfather initiated a stepparent adoption proceeding and sought to terminate the father’s parental rights. While an indigent parent does have the right to appointed counsel in a state-initiated dependency and neglect proceeding, “[t]here is no explicit right to counsel in a stepparent adoption proceeding.”The court held that the trial court should have used the test provided in C.S., 83 P.3d 627, 636 (Colo. 2004) to determine if this particular indigent father was entitled to be appointed counsel on account of his indigency. C.S. provides that the court must consider whether: the parent’s interest is an extremely important one; (2) the State shares with the parent an interest in a correct decision, has a relatively weak pecuniary interest, and . . . has a possibly stronger interest in informal procedures; and (3) the complexity of the proceeding and the incapacity of the uncounselled parent could be . . . great enough to make the risk of an erroneous deprivation of the parent’s rights insupportably high. The court of appeals remanded the case so that the trial court could use the above factors to determine whether appointment was necessary in that specific case since the trial court must answer this question first, subject to appellate review. That being said, the court stated in dictum that (1) parents have an important interest in opposing termination of their parental rights and (2) while the state is not a party to the case in a stepparent adoption proceeding, it does play an “integral part of the process because only the state can officially decree termination of the parental relationship.”

Reminder!

*The OCR has a
new address*

1580 Logan Street

Suite 340

Denver, CO

80203

Colorado Court of Appeals Cases

In the Interest of K.W.S., No. 07CA0667, July 24, 2008. In the Interest of K.W.S., the Colorado Court of Appeals held that it had no jurisdiction to review an unrevoked deferred judgment and sentence agreement. The defendant entered a one-year deferred adjudication agreement where he agreed that the court could “impose any conditions of supervision that it deem[ed] appropriate that are stipulated to by the juvenile and the district attorney.” Among these conditions was the requirement that the juvenile submit to genetic marker testing. The juvenile subsequently motioned for the trial court to defer or stay this requirement. The trial court denied the motion and the juvenile appealed. On appeal, the court held that the deferred judgment agreement was not subject to direct appellate review until it was revoked because an appeals court’s authority to grant post-conviction remedies is limited to instances where a conviction has been entered; a deferred judgment and sentence, by definition, is not a conviction. It is only where that deferred judgment has been revoked that a conviction is entered and the deferred judgment and sentence agreement becomes appealable. Further, “a trial court’s authority to impose supervisory conditions as part of a deferred judgment and sentence agreement extends only as far as the parties stipulate . . . [t]herefore, the unavailability of post-conviction review merely preserves the parties’ stipulations.”

In re the Marriage of Rozzi, No. 07CA0467, June 12, 2008, the Colorado Court of Appeals addressed a post-dissolution of marriage appeal. The petitioner claimed that the court committed reversible error when it appointed a parenting coordinator when there was a claim of domestic violence. She also claimed that error occurred when the appointed parenting coordinator was given special master’s powers. Under § 13-22-313, the court may not appoint a parenting coordinator when one party claims that that s/he has been a victim of domestic violence at the hands of the other party. Under § 14-10-128.1, however, the court is given the power to appoint a parenting coordinator, regardless of whether there is a claim of domestic violence. The court of appeals held that, “with respect for the appointment of a parenting coordinator,” Colorado Revised Statutes § 13-22-313(1) and § 14-10-128.1 were in irreconcilable conflict and that §14-10-128.1 was controlling. When two statutes are in conflict, the more specific statute controls over the more general statute, and the more recently enacted statute controls over the less recently enacted statute. The court found that § 14-10-128.1 is the controlling statute as it is both the more specific statute and the more recently enacted statute. Because § 14-10-128.1 is the controlling statute, the court did not commit reversible error when it appointed a parenting coordinator in this case. The court also held that it was impermissible for the trial court to grant the parenting coordinator the powers and duties of a special master. These two roles are separate and distinct and may not be combined, as C.R.C.P. 53 does not put a parenting coordinator in a decision-making role. Further, §14-10-128.1 does give the court the authority to “assign decision-making duties to the parenting coordinator.” Therefore, the court committed reversible error when it gave special master duties to the parenting coordinator.

In re the Parental Responsibilities of M. J. K., No. 07CA2109 – The issue is whether the trial court erred in applying statutory standards for terminating guardianships and motions to modify allocations of parental responsibility to a biological parent. Mother contends the application of the standards violates her fundamental right to custody, care and management of her children. Grandmother cared for the children with the consent of the mother since 2003, receiving guardianship and decision making responsibility of the four children. In December of 2005, mother filed a motion requesting that primary care and decision-making be returned to her. The court denied the mother’s motions because the court found it in the best interest of the children to remain with grandmother to preserve the stability that they have known for years. The court modified mother’s parenting time to include regular and unsupervised visits with mother. Mother appealed, and the court of appeals was persuaded by other state court decisions in holding where a parent relinquishes through a judicial process and if there is no indication that the relinquishment is temporary, the parent had exercised their fundamental rights. The court also deferred to the statutes where petitions to terminate guardianships must be in the best interest of the child, and modifications to parenting time are prohibited if the parenting time is substantially changed and the party with whom the child resides a majority of the time is altered, unless the child is in an injurious environment. The court opined that a parent who relinquishes cannot be afforded an automatic right to terminate a guardianship or modify parenting time with no regard for the impact on his or her children. Mother also contends the court erred in relying on the information from the CFI. A CFI is appointed by the court to investigate, report and make recommendations to the court taking into consideration the best interest of the child. The record reflects that the CFI was objective as required by the court, and was in compliance with the CJD 04-08 mandates.



Interested in mentoring a new GAL? Please let us know!



New rule requires lawyers to disclose insurance status on registration forms!

Amendment to C.R.C.P. 227

More Cases...

treating psychiatrist and could speak to her emotional and mental health. Bloom also argued that section 16-8-111 does not authorize anything but a formal competency evaluation, and that the trial court abused its discretion by using Dr. Moran's evaluation. Section 16-8-111 defines competency more broadly and does not restrict the method of evaluation to be formal, and the General Assembly grants the authority to the trial court to choose a facility to conduct the evaluation. The court holds that the trial court did not abuse its discretion and the failure of the trial court to obtain a formal competency examination did not make Bloom's hearing inadequate because there was additional evidence to establish Bloom's competency.

Partners in Charge, LLC v. Philip, October 2, 2008 No. 07CA1536—The issue is whether the DV standards adopted by the DV Board apply to presentence evaluations for domestic violence offenders. The DV board was created by statute and governs to evaluation, treatment and monitoring of statewide standards for DV offenders, and they approve the treatment service providers for criminal justice agencies. The DA's office in the 4th judicial district established a pilot program in 2005 with Partners in Charge to use in misdemeanor DV cases. As part of the pilot program, the DA would recommend either probation or a deferred sentence in addition to a pre-sentence treatment evaluation with a specific provider. The DV board notified partners in charge that the pilot program was not in compliance with the DV standards as required by the DV board. Plaintiffs brought this action seeking a declaratory judgment that the DV standards did not apply to case in which a deferred sentence is entered. Plaintiffs argue that the deferred sentence cases were excluded from the reach of the DV standards and that the DV board lacked authority to remove providers from the approved list for failure to recommend standards compliant treatment in such cases. In June 2008, the DV board changed the standards to add "who receive a deferred judgment and sentence." The court concludes that whenever treatment of DV offenders is recommended it must conform with the DV standards because nothing in the statutes limits the DV board's authority to require that treatment recommended under the pilot program conforms with DV standards. The DV board has the authority to sanction and remove a treatment provider from the approved provider list for noncompliance with the DV standards.

In re the marriage of Swing and Stuva, No. 07CA1269, September 4, 2008. The court of appeals affirms the decision of the trial court determining that a job change in anticipation of retirement did not constitute voluntary underemployment. Wife appeals husbands reduce maintenance obligation because in anticipation of retirement husband, a long-haul truck driver, decide change jobs to a local truck driver at a lower wage. The court may consider whether a spouse is voluntarily underemployed when determining maintenance. To date, no Colorado cases have addressed whether a change of employment in anticipation of retirement constitutes voluntary underemployment. But, under Colorado law the retiree has no guarantee that maintenance will be modified based on a decrease in wages. The rule from other jurisdictions is that reduced income due to a spouse's reasonable and in good faith decision to retire, without intention of depriving the other spouse of support should be recognized as a basis for modifying maintenance. The court concludes that in Colorado a court may consider an obligor's spouse's reduced income from early retirement if 1) the obligor's decision was made in good faith; 2) the decision was objectively reasonable based on factors such as age, health and industry practice, the court should find the obligor to be voluntarily underemployed.

In re the Marriage of Dunkle and Valentine, No. 07CA0507, August 21, 2008— Father contends that the trial court erred in excluding mother's overtime pay from the determination of her gross income. Overtime pay is a part of gross income as long as the overtime is required by the employer. The trial court found that mother voluntarily worked overtime hours, and overtime was not required as part of her employment. Father also argues that the trial court failed to include foster care payments and adoption subsidies in her gross income for determining child support. The court looked to other states to as no Colorado appellate court has decided this issue. Other states have held that because the payments benefit the foster or adopted child, that payments are income of the child, and paid for the benefit of the child and not as a replacement for parental income. The court concluded that the adoption subsidies and foster care payments are income of the children and not income of the mother.

CASE TO WATCH

People v. Gabriesheski, NO. 07CA1016, Sept. 4, 2008 – Gabriesheski was charged with sexually assaulting his stepdaughter, T.W., who was the subject of a dependency and neglect case. A GAL was appointed in the D&N case for the stepdaughter. The GAL was called to testify as to statements that T.W. made to her regarding the alleged abuse. The district court held that the GAL had an obligation to maintain the confidentiality of her communications with T.W., and absent a waiver by T.W. could not testify. The court of appeals upheld the district court decision, holding that an attorney-client relationship existed between the GAL and T.W. Additionally, the court held that the social worker's testimony about the sexual allegations was barred without the consent of the child or her mother. The court reasoned that the social worker's testimony was related to the allegations in the treatment plan in the D&N case and under C.R.S. 19-3-207(2), "statements made by respondents to treating professional in D&N proceedings are not admissible ...for any purpose in criminal cases related to the conduct that led to the D&N proceeding."

Note: The court of appeals relied on Chief Justice Directive (CJD) 04-06, section V(B), where GALs are subject to the rules and standards of the legal profession, and Colo. RPC 1.6. The court of appeals did not summarize any decisions regarding best interest representation or the history of GALs in Colorado, or cite to any relevant statutes in its opinion. This decision has presented practitioners with a quandary as to how to provide best interest representation if there is an attorney-client relationship with a child client. See C.R.S. §§ 13-91-103(6), 19-3-203(3), and 19-1-103(59) for the definition of GAL in Colorado, and the role of the GAL in D&N cases. There are several possibilities regarding the outcome of this case, including whether the Colorado Supreme Court decides to grant certiorari. The decision also affects GALs who practice in delinquency, paternity, truancy, probate and domestic relations cases. Many entities, including local and national juvenile law organizations, are expected to file amicus curiae briefs in this case if cert. is granted.

Disciplinary Actions

In the January 2009 edition of the *Colorado Lawyer* appears a disciplinary case summary regarding a GAL who was put on diversion. In this case, the Office of Attorney Regulation found that the GAL violated Chief Justice Directive 04-06 by failing to independently investigate allegations made by another foster parent that resulted in the removal of a child from a foster-adoptive parent's home. Specifically, the Office of Attorney Regulation found that the GAL failed to interview the reporting foster parent or visit the foster parents' home from whom the child was removed. The entire summary of this case can be found on page 95 of the *Colorado Lawyer*. The OCR simultaneously investigated a complaint against this GAL and, as a result of its investigation, terminated the GAL's contract.

Jobs

The NACC is conducting search for a new President/CEO. The NACC is located in Denver, Colorado. Resumes may be submitted in confidence to: Professor Robert C. Fellmeth, Children's Advocacy Institute, University of San Diego School of Law, 5998 Alcalá Park, San Diego, CA 92110, or Email info@caichildlaw.org

OCR applications: Please check the OCR listserv and webpage for information regarding the upcoming application period.

FEDERAL LEGISLATION

Information on Federal Legislation can be found at <http://thomas.loc.gov/>

- ◆ *Fostering Connections to Success and Increasing Adoptions Act H.R. 6893 (P.L. 110-351)*—Highlights of this new legislation include: 1) States will have the option to continue to receive federal Title IV-E financial assistance to support foster care and services for youth who are 18, 19, and 20; 2) if a state accepts IV-e payments for children 18 or older those children are now eligible for federally supported adoption subsidies and permanent guardianship subsidies provided to relatives; 3) Child welfare agencies have a new obligation to notify a child's relatives as soon as a child is placed in foster care and relatives must be informed of the child's removal and their rights to participate in the child's case and provide foster care and of the eligibility of the federally subsidized permanent guardianship program; 4) within 90 days of the date of emancipating from foster care, youth must complete a transition plan that is "personalized at the direction of the child."
- ◆ *Mental Health Insurance*—This legislation requires that group health insurance plans provide the same level of treatment benefits for mental health and substance related disorders as they do for other necessary medical care. Was S. 558 and is now P.L. 110-343. *Mental Health Parity Act of 2007 - (Sec. 2)* Amends the Employee Retirement Income Security Act (ERISA) and the Public Health Service Act to require a group health plan that provides both medical and surgical benefits and mental health benefits to ensure that: (1) the financial requirements applicable to such mental health benefits are no more restrictive than those of substantially all medical and surgical benefits covered by the plan, including deductibles and copayments; and (2) the treatment limitations applicable to such mental health benefits are no more restrictive than those applied to substantially all medical and surgical benefits covered by the plan, including limits on the frequency of treatments or similar limits on the scope or duration of treatment. Prohibits the plan from establishing separate cost sharing requirements that are applicable only with respect to mental health benefits. Requires that such a plan ensure that the requirements of this Act are applied to both in- and out-of-network services, if offered, by comparing in-network medical and surgical benefits to in-network mental health benefits and out-of network medical and surgical benefits to out-of-network mental health benefits.
- ◆ *Juvenile Justice Reform Act of 2008, H.R. 6934, introduced September 17, 2008*- Amends the Juvenile Justice and Delinquency Prevention Act of 1974 to: (1) revise the definition of "contact" in such Act to include any sight or sound interaction between a juvenile in custody and an adult inmate; (2) expand eligibility for participation in grant programs under such Act to certain individuals and organizations with an interest in the juvenile justice system ("juvenile justice stakeholders"); (3) require state plans under such Act to provide for increased protections for juveniles in custody, provide for culturally and linguistically appropriate services to juveniles at risk, and establish policies and strategies to identify and reduce racial and ethnic disparities among youths in the juvenile justice system; (4) require the inclusion on state juvenile delinquency prevention advisory boards of individuals with experience and competence in addressing the needs of girls or in implementing gender responsive services; and (5) require the Administrator of the Office of Juvenile Justice and Delinquency Prevention to assess and report on the effectiveness of treating juveniles as adults for purposes of criminal prosecutions.
- ◆ *Domestic Violence*— This bill, H.R. 6088, was introduced in the House and Reported in the Senate. *National Domestic Violence Volunteer Attorney Network Act - Amends the Violence Against Women Act of 1994 to authorize the Attorney General to award grants to the American Bar Association Commission on Domestic Violence to work in collaboration with the American Bar Association Committee on Pro Bono and Public Service and other organizations to create, recruit lawyers for, and provide training, mentoring, and technical assistance for a National Domestic Violence Volunteer Attorney Network. Authorizes appropriations for such grants for FY2008-FY2013.*



Cost of Dropping Out of high school:

Average income for high school dropout in 2005 is \$17,299 compared to \$26,933 for a graduate

More than 1.2 million students did not graduate from high school in 2008. The lost lifetime earnings for that class is nearly \$320 billion dollars.*

*Information from the NCSL State Legislatures Magazine Oct/Nov. 2008 issue



BLOGS

<http://www.scotusblog.com/> - Blog on the US Supreme Court cases and high court news

www.legalethicsforum.com —blog from 15 law professors on legal ethics

<http://howappealing.law.com/> - Appellate Litigation blog

STATE LEGISLATION

For more information on the legislative session see <http://www.leg.state.co.us/>. The General Assembly will convene on January 7, 2009. There are many changes in this year's House and Senate, including new JBC (Joint Budget Committee) members and a new leadership in the House and Senate. As always, OCR staff monitors legislation, and advocates for the OCR budget during the session. OCR staff contacted JBC members over the last few weeks to discuss increased funding for the OCR budget due to caseload increases. We would especially like to thank our GALs who visited with JBC members in December: Cathy Cheroutes, Michael Williams, Jamie Henderson, Jim Kennedy, Liz Brodsky, and Richard Slosman.

Leadership changes:

JBC—Sen. Moe Keller, Sen. Abel Tapia, Sen. Al White, Rep. Pommer, Rep. Ferrandino and Rep. Marostica

House Leadership: Speaker Rep. T. Carroll, Majority Leader Rep. Weissman, Minority Leader Mike May

Senate Leadership: President Sen. Groff, Majority Leader Sen. Shaffer, Minority Leader Josh Penry,

Resources

- ◆ Girls Study Group, Understanding and Responding to Girls Delinquency—<http://www.ncjrs.gov/pdffiles1/ojjdp/223434.pdf>
- ◆ The Future of Children, Journal on Juvenile Justice includes articles on the Adolescent Brain and Delinquency, Disproportionate Minority Contact and Adolescent Offenders with Mental Disorders: http://www.futureofchildren.org/pubs-info2825/pubs-info_show.htm?doc_id=708717
- ◆ Understanding the Behavioral and Emotional Consequences of Child Abuse found in the September issue of *Pediatrics*, <http://pediatrics.aapublications.org/cgi/content/full/122/3/667>
- ◆ Survey finds increased youth substance abuse in Single-Parent Households—<http://oas.samhsa.gov/2k8/parents/parents.cfm>.
- ◆ New Underage drinking website with information on current statistics, resources on drinking prevention and underage drinking—<http://www.niaaa.nih.gov/AboutNIAAA/NIAAASponsoredPrograms/underage.htm>
- ◆ Government Accountability Report on young adults with mental illness—Details the barriers youth face when coping with mental illness. The report also focuses on several states and federal programs that are working to improve the system. For the report: www.gao.gov/docsearch/abstract.php?rptno=GAO-08-678.
- ◆ RAINN (Rape, Abuse and Incest National Network) website www.rainn.org and hotline 1-800-656-HOPE—search for counseling centers and general information
- ◆ Street Law—www.streetlaw.org. This website highlights issues on law, democracy, human rights and encourages knowledge of legal rights for youth and adults.
- ◆ Boost—<http://boostup.org>. This site has stores and multimedia resources to help students who are struggling to graduate from high school.

Conferences

Don't miss the OCR Steamboat Conference Feb. 19-20, 2009. Please join us –it is always the best OCR conference. Come see nationally recognized speaker Father Greg Boyle. Register at the OCR website.

ABA National Conference on Children and the Law - Washington, D.C. May 14-16, 2009. See www.abanet.org for information.

AFCC 46th Annual Conference, May 27-30, 2009, New Orleans, LA contact AFCC at 608-664-3750 for more information or afccnet.org

Save the Date—The Colorado Dept. Of Human Services Annual Summit will be held at the Keystone Conference Center June 2-5, 2009.

OFFICE OF THE CHILD'S
REPRESENTATIVE

1580 Logan St., Suite 340
Denver, CO 80203

Phone: 303-860-1517
Fax: 303-860-1735
E-mail: resourcecenter@coloradochildrep.org

Check out the web site

www.Coloradochildrep.org

Articles and periodicals are on file in the OCR library. Stop by the office or call Melanie in order to check out materials.

- ◆ The Expanded Jurisdictions of the Probate Court under **In re J.C.T.**, by Paula Constantakis Young, *The Colorado Lawyer*, Nov. 2008, Vol. 37, No. 11.
- ◆ Parental Financial Liability for Juvenile Delinquents, by Daniel S. Foster and Nicole M. Mundt, *The Colorado Lawyer*, Nov. 2008, Vol. 37, No. 11.
- ◆ **Child Welfare Journal of Policy, Practice, and Program**, Special Issue on Racial Disproportionality in child welfare, Vol. 87 #2 , on file in the OCR library.
- ◆ Special Issue on Child Trauma, **Juvenile and Family Court Journal**, Vol. 59, No. 4, Fall 2008. Articles on Helping Children Heal from Trauma, Best Practices for Serving Traumatized Children and Families, Children with Sexual Behavior Problems, Obtaining Information from Children in the Justice System, and How to Maintain Emotional Health when Working with Trauma.

OCR in Brief

- ◆ The OCR has several new board members: Peg Rudden, Advocates for Children (CASA), Lynn Hufnagel (formerly of Brownstein, Hyatt and Farber), Joe Wallis, (GAL in El Paso County), and Laura Hunt (Director of the child advocacy center in Ft. Collins).
- ◆ We wish to thank the outgoing board members for all of their hard work and dedication: Celeste Holder Kling, Eric Weisman, John Anthony Aybeta and Tedi Cox.
- ◆ Congratulations to Magistrate Jane Westbrook, Judge Robert Lowenbach and Judge Cheryl Post on retiring from the bench. We will miss their dedication and presence on the bench.
- ◆ Congratulations to Gail Meinster on her appointment to the bench in Jefferson County.
- ◆ This year, the OCR is embarking on a new outreach project aimed to elevate the status of juvenile law and GALs within the legal profession by raising awareness about the important work that GALs do and the high quality representation they provide. For more information about this project, contact Sheri Danz at extension 7.

Nominate your peers for a GAL award. To nominate a GAL contact Ryan Burke at the OCR for a form.