IN THE SUPREME COURT
OF THE STATE OF CALIFORNIA

IN RE CHRISTOPHER L., A Person Coming under the Juvenile Court Law	
LOS ANGELES COUNTY DEPARTMENT OF CHILDREN AND FAMILY SERVICES, Petitioner and Respondent,	**Case No. S265910**
v.	**Case No. B305225 (Court of Appeal) Superior Court No. 17CCJP02800 (LOS ANGELES COUNTY)**
WILLIAMSON. C. Respondent and Petitioner.	

ON APPEAL FROM THE SUPERIOR COURT,
LOS ANGELES COUNTY

HONORABLE MARGUERITE DOWNING, JUDGE

RESPONSE OF PETITIONER/APPELLANT CARLOS L. TO THE AMICUS BRIEF FILED BY CALIFORNIA STATE ASSOCIATION OF COUNTIES AND CALIFORNIA APPELLATE DEFENSE COUNSEL.

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DEPARTMENT OF CHILDREN	)	
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	)	**Superior Court No.**
WILLIAMSON. C.	)	**17CCJP02800**
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ON APPEAL FROM THE SUPERIOR COURT,
LOS ANGELES COUNTY

HONORABLE MARGUERITE DOWNING, JUDGE

RESPONSE OF PETITIONER/APPELLANT CARLOS L. TO THE AMICUS BRIEFS FILED BY CALIFORNIA STATE ASSOCIATION OF COUNTIES AND CALIFORNIA APPELLATE DEFENSE COUNSEL.

TO THE HONORABLE TANI CANTIL-SAKAUYE, CHIEF JUSTICE AND THE HONORABLE ASSOCIATE JUSTICES OF THE SUPREME COURT OF THE STATE OF CALIFORNIA:

Petitioner CARLOS L. hereby submits the following as his responsive brief to the amicus brief filed by the California State Association of Counties (CSAC) on behalf of respondent Los Angeles County Department of Children's and Family Services (DCFS) and to the brief filed by the California Appellate Defense Counsel (CADC) in support of his position. This Brief is filed

pursuant to California Rules of Court, Rule 8.520, subdivision (c). The fact that petitioner may not respond to all of the points made by the two amici is not a concession that amicus or respondent is correct as to those points but is merely an indication that petitioner is satisfied with the analysis he presented on those points in other pleadings before this court.

ARGUMENT

I.

INTRODUCTION.

Petitioner Carlos L. expresses his gratitude to amicus California Appellate Defense Counsel (CADC) for its excellent brief in support of his position that the concept of structural error has an important, albeit limited role, in dependency appeals and has nothing to add to its excellent analysis other than a profound debt of gratitude. Accordingly, the balance of this brief is intended to respond to the arguments raised by CASC, amicus for respondent.

Sometimes a brief is remarkable for what it does not say rather than for what it does say. Omissions or failure to respond to key points raised by the petitioner or to key facts often reveals much about what the respondent and its amici think about the merits of the case. This case is not just about a complete failure to apply due process at two of the most critical phases of a dependency proceeding, it is also about a trial court's failure to carefully read the reports presented to her which contained the petitioner's handwritten, heartfelt plea to participate in the dependency proceedings involving his two very young children.

Amicus makes it clear that it does not believe that the concept of structural error has any place in dependency law. It accepts, however reluctantly, that some errors are so fundamental that they must be always be considered to be reversible regardless of whether the result would have been different had the error not occurred. However, amicus believes that such a concept, called structural error, has no place in dependency law because of the constitutional needs of children, who are both parties to the proceeding and the subject of the proceeding, to stability and permanency. Amicus is wrong.

This Court has always and consistently accepted the concept that structural error can apply to dependency proceedings. All that it has said is that "caution should be exercised" in its application to dependency proceedings as there are significant differences between criminal proceedings, where the concept was first developed, and dependency proceedings because of the profound differences between the two. (***In Re James F.*** (2008) 41 Cal.4th 901, 914). (***James F.***).

Amicus spends much of its briefing discussing the development of structural error as a basis for reversing a judgment of the trial court. That is interesting from a historical standpoint but it does very little to solve the problem of whether and just how much of the concept of structural error should apply to dependency law.

But first, a definition of structural error. It is an error that affects the framework of the trial rather than an error in the trial process itself. (***Arizona v. Fulminante*** (1991) 496 U.S. 279, 310

[111 S.Ct. 1246, 113 L.Ed2d 302]). It is of such a nature that it is extremely difficult, if not impossible, to ascertain the extent to which one party has been prejudiced by the error. Or, another way to put it is that any time an appellate court reverses the trial court without assessing the prejudice, the error involved is structural in nature as it involved the framework of the trial. The reviewing court may not choose to use the words "structural error" but it is clear that this is Juliet's rose by another name.

Amicus spends almost no time on analyzing the many instances in which appellate courts have simply reversed judgments/orders of the trial courts for errors without making any analysis of the prejudicial nature of the error. Typically, these cases all involved the most basic fundamental trial rights that any defendant/respondent has in a case in which the state seeks to abrogate his/her zealously guarded constitutionally protected rights. And there is no doubt but that the right of a parent to raise one's children as one sees fit with one's own values and belief systems is one that is zealously protected by both the California and United States Constitutions. ***Moore v. East Cleveland*** (1977) 431 U.S. 494, 499 [97 S.Ct. 1932, 1935, 52 L.Ed.2d 531]; ***Pierce v. Society of Sisters*** (1925) 268 U.S. 510, 534–535 [45 S.Ct. 571; 69 L.Ed. 670]; ***Troxel v. Granville*** (2000) 530 U.S. 57, 66, [120 S.Ct. 2054, 147 L.Ed.2d 49]).

These rights include the right to notice of the proceedings; the right to counsel and the effective assistance of counsel; the right to confront the evidence against oneself including the right of cross-examination of adverse witnesses; the right to be present;

the right to testify on one's own behalf and the right to compel the state to present its case using the appropriate standard of proof. There are also other rights that are also critical such as the right to discovery, ahead of trial, of the nature of the state's evidence and the right to appeal. (***In Re A. R.*** (2021) 11 Cal.5th 234).

Dependency cases, despite their differences from ordinary civil cases or criminal cases, share the same basic framework. There is an unbiased decision maker of what occurred (jury or bench officer), an arbiter who decides questions of law (bench officer); orderly presentation of evidence including the right to challenge adverse evidence and to present one's own evidence; the right to counsel (and, in certain circumstances, right to court-appointed counsel, in both criminal and dependency cases); and the right to be present.

What happened in this case was the collapse of the framework. It was not simply that there was error in the trial proceedings (which there very clearly were), but that the trial was conducted without any sort of basic framework.

No one has offered any legitimate excuse to justify the denial of appellant's right to competent counsel, why he was not allowed to be present, why he was never confronted with the state's evidence against him and why he was never allowed to present his own evidence. This is the very framework of the jurisdiction hearing and the disposition hearing which were combined in this case.

It is this flaw – the complete collapse of due process in this case that compels the reversal of the decision of the trial and

appellate courts in this case without any recourse to the concepts of harmless error, be it the traditional California standard announced in ***People v. Watson*** (1952) 46 Cal.2d 818 – a miscarriage of justice or harmless by a preponderance of the evidence – or the one employed for more serious errors of a constitutional nature found in ***Chapman v. California*** (1967) 386 U.S. 18, 24 [17 L.Ed.2d 705, 87 S.Ct. 824] – harmless beyond a reasonable doubt. Neither respondent nor its amicus recognize or accept that this case involved a complete breakdown of due process.

II.

THE CONCEPT OF STRUCTURAL ERROR HAS A LIMITED, BUT CRITICAL, ROLE IN ALL DEPENDENCY PROCEEDINGS ESPECIALLY THOSE THAT RESULT IN THE TERMINATION OF PARENTAL RIGHTS.

The basic theme of amicus CSAC is that the concept of structural error does not belong in dependency law primarily because it "interferes" with the rights of children to permanency and stability while they are still young and dependent upon their parents and society for their support and nurturing. In effect, it wants to overturn this Court's decision in ***James F.*** which accepted the concept, albeit in a cautious manner, could apply to dependency cases.

James F. is a well-crafted opinion from this Court that accepts that dependency cases are fundamentally different from most other cases, including criminal and the vast majority of civil cases, which deal with the legal effects of past events. Dependency cases (and certain Family law cases involving child custody)

deal with how to handle the future life of young children based upon past events and what we can reasonably expect from the persons ordinarily charged with their care – namely their parents.

James F. then discussed the concept of structural error as it relates to dependency cases. This Court stated that:

> "Preliminarily, we observe that juvenile dependency proceedings differ from criminal proceedings in ways that affect the determination of whether an error requires automatic reversal of the resulting judgment. The rights and protections afforded parents in a dependency proceeding are not the same as those afforded to the accused in a criminal proceeding...In a criminal prosecution, the contested issues normally involve *historical* facts ...whereas in a dependency proceeding the issues normally involve evaluations of the parents' present willingness and ability to provide appropriate care for the child and the existence and suitability of alternative placements. Finally, the ultimate consideration in a dependency proceeding is the welfare of the child...***These significant differences between criminal proceedings and dependency proceedings provide reason to question whether the structural error doctrine that has been established for certain errors in criminal proceedings should be imported wholesale, or unthinkingly, into the quite different context of dependency cases.*** (*Id.*, at 915-916, citations omitted, emphasis added).

In other words, caution must be used. This language does not mean, as amicus suggests, that structural error cannot be considered in the context of dependency cases – only that care should be exercised and it should be well reasoned and careful thought must go into the decision. In ***James F.***, the error (which would have been structural error in the criminal context) was not structural error in the dependency context.

Throughout his pleadings in this Court and in the Court of Appeal, petitioner cited many examples of appellate courts reversing decisions of the trial courts in dependency cases because the prejudicial effect of the error was either too difficult to readily ascertain or the error involved a basic and fundamental due process right of one of the litigants. For example, it is structural error to deny a parent a contested hearing on an issue on which the Department/Agency bears the burden of proof. (***In Re Kelly D.*** (2000) 82 Cal.App.4th 433, 439, fn. 4; ***In Re Josiah S.*** (2002) 102 Cal.App.4th 403, 417-418). The court cannot even require an offer of proof. (***In Re James Q.*** (2000) 81 Cal.App.4th 255, 265-266). Another structural error is the failure to provide the parent with a copy of the petition. (***In Re Andrew M.*** (2020) 46 Cal.App.5th 859, 867, fn. 4). It was structural error for a trial courts to refuse a continuance to parents so they could evaluate a tardy report prepared by social workers recommending termination of reunification services and/or parental rights. (***Judith P. v. Superior Court*** (2002) 102 Cal.App.4th 535, 548; ***Tracy A. v. Superior Court*** (2004) 117 Cal.App.4th 1309, 1318 – neither

case was discussed or disapproved by this Court in ***James F.***, despite having predated that case, *but see*, *contra* ***In Re A. D.*** (2011) 196 Cal.App.4th 1319, 1328). There was also a summary reversal without a discussion of prejudice in an instance where the trial court denied the parent the right to testify on her own behalf. (***In Re M. M.*** (2015) 236 Cal.App.4th 955, 964-965).

Amicus does not discuss these cases and makes absolutely no attempt to distinguish them or explain them away. It is obvious that amicus cannot present a coherent argument as to why these cases were erroneously decided as it knows full well that they were correctly decided and that the courts that decided them were correct not to engage in a "harmless error" analysis but simply to summarily reverse.

This case involves the abysmal failure of the trial court to accord appellant/petitioner of at least two of the basic due process rights that are accorded any parent in any case that potentially involves a termination of parental rights and respondent, in this case, set that as its goal from the outset of this case for both appellant and his wife, Valerie. The two rights were his right to counsel which appellant has argued is guaranteed both by statute and the federal/state constitutions (Welfare and Institutions Code sections 317, 317.5; ***Lassiter v. Department of Social Services*** (1981) 452 U.S. 18, 31[101 S.Ct. 2153; 68 L.Ed.2d 640]; ***In Re Emilye A.*** (1992) 9 Cal.App.4th 1695, 1701, 1711-1712) and his right to confront the evidence against him and to present his own evidence. (Welfare and Institutions Code section 355, ***Kelly***

D.,*supra* 82 Cal.App.4th at 439, fn. 4).[1] Again, amicus fails to discuss, in any meaningful manner, the importance of these rights and how important they can be to incarcerated parents as developed in Penal Code section 2625.

Again, the lack of any meaningful discussion of the case law involving section 2625 undermines the arguments of amicus that a harmless error analysis can be undertaken whenever it is violated.[2] However, petitioner will be quite clear. He is not stating that all purported violations of section 2625 are error not subject to a harmless error analysis. What petitioner is stating is that ***some violations*** are sufficiently egregious that structural error is the only appropriate remedy to apply.

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[1] As appellant/petitioner noted in his reply brief, his right to notice was honored more in the breach than in the substance. True, he was given notice of the proceedings and responded to that notice but certainly the trial court ignored his response and, arguably, so, too, did respondent and counsel for the minors when they each failed to correct the trial court egregious misstatement that appellant/petitioner had not responded to whatever notice had been sent to him. As petitioner pointed out, what good is notice if the trial court is going to ignore his response to that notice?

[2] Amicus even fails to discuss ***In Re Jesusa V.*** (2004) 32 Cal.4th 588, 621-624, in any meaningful manner. Petitioner demonstrated how that case is not at all helpful to analyzing the problems of this case. Perhaps even more startling is the decision of amicus not to discuss ***In Re Marcos G.*** (2010) 182 Cal.App.4th 369 which respondent seemed to find closely analogous to this case. But, as petitioner noted in other briefing, ***Marcos G.*** involved a situation where the social service agency (and the court) made valiant efforts to comply with section 2625 but were thwarted at every turn by the parent in that case.

III.

PUBLIC INTERESTS CLEARLY SUPPORT THE APPLICATION OF STRUCTURAL ERROR IN CASES LIKE THIS ONE WHERE THERE WAS ABSOLUTELY NO ATTEMPT TO SECURE THE INCARCERATED PARENT'S ATTENDANCE TO THE PROCEEDINGS INVOLVING HIS CHILDREN AND WHERE THERE WAS NO ATTEMPT TO PROVIDE HIM WITH THE EFFECTIVE ASSISTANCE OF COUNSEL.

In what may only be described as a"unusual" argument, amicus makes the claim that "public interests" support a decision to deem harmless error in a case such as this one where there was absolutely no attempt to comply with petitioner's most basic rights to be present at critical hearings involving his children and to the effective assistance of counsel and the right to challenge the allegations made against him.

Its rationale is simple; namely, in its view, the interests of children in dependency proceedings are so superior to those of parents that virtually any error can be deemed subject to a harmless error analysis regardless of how basic and how fundamental the error may be.

Petitioner agrees that the interests of children to stability and permanency are vitally important but not necessarily paramount over the parents' right to raise their children and that the interests of the children should be protected in an expeditious ***but fair and just*** manner. That includes the presence and participation of all interested parties whenever possible. As stated in ***Ansley v. Superior Court*** (1975) 186 Cal.App.3d 477, 490-491:

> "[I]t is implicit in the juvenile dependency statutes that **it is always in the best interests of a minor to have a dependency adjudication based upon all material facts and circumstances and the participation of all interested parties entitled to notice.**" (*Id.* at 490-491, emphasis added).

(*Accord, **In Re R. A.*** (2021) 61 Cal.App.5th 826, 837). Or, as another case put it – "Under our system of justice expediency is never exalted over the interest of fair trial and due process." (***People v. Manson*** (1976) 61 Cal.App.3d 102, 201).

However, the arguments of amicus ignore critical factors found in this case. Here, everyone knew, at all stages of the proceedings exactly where petitioner was – he was incarcerated at a facility maintained by the State of California. It was thus possible to bring him before the Court. Petitioner requested to participate in these proceedings. He made that known to respondent and, to respondent's credit, respondent attached his letter to the reports it submitted to the court.

At that point, the system fell apart.

The trial court clearly failed to read the reports presented to it; the court stated very clearly that petitioner had not responded to the notice[s] sent to him; neither respondent's counsel nor minor's counsel, both of whom were charged with having read the report, ever make any attempt to correct the court then or at any other time in the proceedings. This was followed by a failure to appoint counsel for a parent who sorely needed and wanted

counsel. Even after counsel was appointed, no one pointed out the earlier failure to comply with section 2625.[3]

Petitioner is not stating that Judge Downing deliberately lied or misled everyone by saying what she did; certainly, if she had, that would be judicial misconduct worthy of removal from the bench. It was inadvertent and likely aggravated by a long, complex calendar with which she had to deal that day; others may have seemed more important to her this day in which neither parent was present in court. But whether intentional or inadvertent, it makes no difference. The result was the same – there was a complete lack of due process and failure at the early, critical stages of this case and, in effect, throughout this entire case.

If ever there was a case for the application of structural error to dependency proceedings, this is it. Any time there is a complete failure to comply with Penal Code section 2625 as well as Welfare and Institutions Code section 317, we should and must not hesitate. Reversal is required because of the total absence of due process and fair play. It is never in the interests of the public to dispense with these items and it is certainly not in the best interests of children either. One expects that such a widespread failure of due process as occurred in this case will rarely happen

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[3] Here, petitioner notes that, when Judge Downing first broached the possibility of counsel for petitioner, she asked the LADL firm that normally acts as counsel for parents, to act as a "friend of the court" to contact petitioner and inform him about the proceedings to terminate his parental rights. (RT 9/6/18 p. 6). Counsel who acts as a "friend of the court" is not an advocate for one of the parties.

but happen it did.[4] When it does, the remedy must be sure and swift. Reversal!

It certainly would be more expedient to dispense with inconvenient niceties in dependency cases like strong advocacy for the parent or compelling the social services agency to prove its case. If instead , we use a harmless error approach to egregious errors such as found here, one is left to wonder why we even go to the trouble of holding juvenile court hearings in every case. It would be a lot faster and easier for judges to first read Department reports and then decide whether it is worth hearing from the parents at all. This would seem to be the approach that amicus favors but it is not the approach favored by the state and federal constitutions. It is an approach favored by tyrants, would-be tyrants and those who "claim to know best."

IV.

CONCLUSION.

Amicus is basically asking that any mistake, any error, whether intentional or accidental, no matter how egregious, no matter how pervasive, can be subject to a "harmless error" analysis. Some mistakes and errors defy such an analysis. A complete collapse of due process and fair play is one such example.

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[4] It may not be as rare as all that. As petitioner noted in his petition for review in this Court, there was another published, but now depublished, case with an uncanny resemblance to this case. That case, ***In Re S. P.*** (2020) 52 Cal.App.5th 963,review denied and depublished on November 18, 2020, did not involve any known failures by the trial court to ignore pleas from the incarcerated parent to participate in the proceedings as he made none. That may have made a difference in the outcome. The case had a vigorous dissent.

In any case in which a litigant is entitled to the assistance of court-appointed counsel as a matter of constitutional/statutory right and denied such assistance after making it clear that he/she wanted to participate in the proceedings, reversal should occur as a matter of course without recourse to any concepts of "harmless error."[5] (*C.f.,* ***Powell v. Alabama*** (1932) 287 U.S. 45, 71 [53 S.Ct. 55; 77 L.Ed. 58] – The Scottsboro Boys case; ***Gideon v. Wainwright*** (1963) 372 U.S. 335, 344 [83 S.Ct.792; 9 L.Ed.2d 799].). This Court must reverse the decision of the Court of Appeal and the trial court and remand for appropriate proceedings.

Dated: September 9, 2021

CHRISTOPHER BLAKE, SBN #53174
Attorney for Petitioner,
CARLOS L.

[5] "Harmless error" is something of a necessary evil in appellate law. Were any error deemed to reversible, then almost every case would be reversed as it is nearly impossible to have an error-free trial. But too great a reliance on the concept will result in miscarriages of justice. Furthermore, the appearance of justice is every bit as important as justice itself. (***Offutt v. United States*** (1954) 348 U.S. 11, 14 [75 S.Ct. 11; 99 L.Ed. 11]; ***Lois R. v. Superior Court*** (1971) 19 Cal.App.3d 895, 903; ***In Re Emily D.*** (2015) 234 Cal.App.4th 438, 445).

CERTIFICATE OF NUMBER OF WORDS IN BRIEF.

I hereby certify that this brief consists of 3,782 words, including footnotes, as counted in the word count function of WordPerfect, the computer program used to prepare this brief.

Dated: September 9, 2021

_____

CHRISTOPHER BLAKE

PROOF OF SERVICE

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Petitioner's Response to Amicus Briefs

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Executed at San Diego, California.

Dated: September 9, 2021

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Supreme Court of California

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Supreme Court of California

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Case Number: **S265910**
Lower Court Case Number: **B305225**

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