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SUPREME COURT
OF THE STATE OF WASHINGTON

Mary J. Green vs. Jerome K. Green

Jerome Green's Reply to DSHS Answer and DSHS Motion to Dismiss
[Treated as the answer to the motion to supplement the record](#)

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I. INTRODUCTION

DSHS has filed an Answer to Jerome Green's Petition for Review. DSHS has also filed a motion to supplement the record of this case with a trial court record (notice of death) of a different case, viz. guardianship of Mary J. Green, Spokane County Case #19-4-00298-32. In their Answer to Jerome Green's Petition for Review DSHS raises the issue that, due to the death of Mary Green, Jerome Green's appeal is moot since "the protection order no longer has any effect" and that "there is no further relief this court can provide him." (DSHS answer, pg.7) In fact there is further relief this court can provide by reversing, voiding or vacating the VAPO judgments entered against Mr. Green so that Jerome Green's name will be removed from the Washington state abuser registry. DSHS's motion to dismiss the Jerome Green appeal due to "mootness" based on the death of his mother should be denied and this court should accept Jerome Green's Petition for Review.

II. STATEMENT OF THE CASE

On Jan. 31, 2019 AAG Dawn Vidoni and APS investigator Tonya Claiborne signed, attested to and caused to be served an ex parte temporary VAPO order upon Jerome Green at his residence without any prior notice to him [CP 1-28, 31-33] The judicial VAPO petition and

declaration from Vidoni and Claiborne alleged that 1) Mary Green was being abused by her son Jerome in that Mary Green's children were going back and forth having Mary sign/revoke alternative powers of attorney and that 2) Jerome was feeding and providing liquids to his mother that put her at risk of aspiration. [CP 1-28, 31-33] There was never any proof that Jerome Green had ever caused his mother to choke¹. This petition also alleged that DSHS was going to file a petition for a "professional" guardianship of Mary J. Green [CP 1-28, 31-33] even though Mary Green had previously indicated to DSHS in writing on Feb. 6, 2019 that she did not want a guardianship. [CP 217-20] In her ruling Commissioner High-Edward made a finding of neglect and abuse on the part of Jerome Green.[CP 78-96]

The commissioner made findings of "abuse" and "neglect" as to Mr. Green's inability or unwillingness to follow feeding instructions for his mother although he never received any such training from DSHS. [RP 51, lines 9-10, May 13, 2019 hearing]. As to Jerome Green's intent, Comm. High-Edward ruled that "I don't think you did it with intent to harm your mom because I absolutely don't think you have that intent."

¹ DSHS (pg. 3 of Answer) references an incident where "Ms. Green turned blue and required life-saving intervention." However, DSHS neglected to tell this court that Mary Green was under the care, custody and supervision of her daughter Sherri Green when this incident occurred. Jerome Green was not involved with this.

[CP 78-96 pg 14, lines 2-4)] The commissioner also revoked Jerome Green's Power of Attorney without making any findings whatsoever that he had, in any way, breached his fiduciary duties as Power of Attorney for Mary Green or that this POA had been obtained via undue influence. [P 78-96]

Since AAG Vidoni had alleged in the VAPO petition that DSHS was planning to file a guardianship petition Mr. Ggreen's attorney (Robert Critchlow) asked if they could be given a date certain so that they could respond. The commissioner then put in the VAPO order that AAG Vidoni was to file the guardianship petition the following Monday Feb. 25, 2019.[CP 62-64] Despite being court ordered to file the guardianship petition the following Monday, Feb. 25, 2019 Vidoni left the VAPO hearing and presented her petition (ex parte) that very same day Friday, Feb. 22, 2019 to Commissioner Tony Rugel who signed an ex parte order appointing Dianna Evans as guardian ad litem for Mary Green. Vidoni did this without giving Jerome Green or his attorney Robert Critchlow an opportunity to appear and contest the appointment of a guardian ad litem.

This DSHS petition for guardianship extensively referenced Jerome Green on page 4, par 12 and mentioned that several powers of attorney were made and revoked "possibly via undue influence." This

petition also alleges that DSHS has filed a vulnerable adult petition against Jerome Green and even lists the VAPO court case number. The guardianship petition (page 4, par.12) also alleged that Jerome Green has been “financially exploiting” Mary Green. This DSHS petition for guardianship was filed by AAG Vidoni on February 25, 2019 well after the date of February 6, 2019 when Mary Green had personally (and in writing) notified Tonya Claiborne and DSHS that Mary did “not want a guardianship” [CP 217-20]

After the Feb. 22, 2019 VAPO hearing, Jerome Green filed a motion to revise commissioner High-Edward’s ruling and Judge Moreno granted the motion to revise and remanded the case because there was an “unresolved issue regarding Mary Green’s inability to consent as well as the burden of proof.” [CP 193-194]

On March 26, 2019 AAG Vidoni filed a motion to modify the VAPO order of Feb. 22, 2019 [CP 107-123] requesting, inter alia, that the court make a finding of “financial exploitation” on the part of Jerome Green. DSHS alleged that Mr. Green had opened a new bank account with Washington Trust Bank, had deposited a \$3500.00 check therein and had been making regular and unauthorized withdrawals for the benefit of himself and not for the benefit of his mother Mary Green. [CP

107-123] DSHS offered no support for these allegations other than financial records showing certain deposits and withdrawals. In other words, it was pure speculation on the part of Vidoni, Claiborne and DSHS that Jerome Green had been engaging in “financial exploitation” of his mother Mary J. Green. [CP 107-123]

On April 11, 2019 a status hearing was held and the court for the first time ordered [CP 141-142] APS investigator Tonya Claiborne to provide discovery (DSHS records) to attorney Critchlow’s office by April 17, 2019. The court also ordered that Jerome Green “may not remove any documents or any other items from her home” [CP 141-142] Jerome Green filed his response on April 25, 2019 [CP 160-170, 146-159] in which he explained that 1) his attorney Robert Critchlow had advised him to open the new bank account due to the continuing interference by his sisters with the Umpqua Bank account and 2) the \$3500 check was for a personal injury settlement received from attorney Larry Kuznetz and that Kuznetz had advised Jerome (pg.3) to “pay it down” (on household expenses, etc) to reduce the amounts that exceeded the Social Security rules on a how many assets a recipient could maintain in their accounts and still be eligible for services. Jerome went on to explain all the purchases he made for the benefit of Mary Green (maintenance and repairs to house, etc) Due to the April 11, 2019 order

prohibiting him from retrieving his financial records and receipts from his home and principal place of business Jerome was only able to provide one invoice dated April 3, 2019 from AAA Drain Pros [CP 145-159]

By her letter to the parties dated April 30, 2019 [CP 171] Commissioner High-Edward stated that she had reviewed the court file and there was no evidence that Mary Green had ever been personally served with the original petition (including the notice of rights) and “without this I am unable to make a finding of consent when I am unsure if Mrs. Green was notified of her right to object.” Commissioner High-Edward then ordered that “the Department is required to serve Mrs. Green with the original petition and her notice of rights and provide a return of service to this effect before the hearing date.”[CP 171]

After receiving Jerome’s declaration about the allegations of “financial exploitation” AAG Vidoni and APS/DSHS withdrew their request to modify the VAPO to include a finding of “financial exploitation” [CP 179-181 and on, page, lines 23-24) and AAG Vidoni stated that “is it best handled administratively.” In the VAPO modification hearing of May 13, 2019 Commissioner High Edward ruled that Mary Green “did not consent” to the VAPO petition and that the

correct burden of proof for the Feb. 22, 2019 VAPO hearing was the “preponderance of evidence” standard. [CP 193-194]

III. MOOTNESS ISSUES RAISED IN DSHS ANSWER

DSHS argues (DSHS answer, page7) that Jerome Green’s case is moot since due to the death of Mary Green “the protection order no longer has any effect” and that “there is no further relief this court can provide him.

A party filing a reply to an answer should be limited to addressing only the new issues raised in the answer RAP 13.4(d) and so this reply only addresses the “mootness” issue. A case is moot and should be dismissed when it involves only abstract propositions or questions, the substantial questions in the trial court no longer exist, or a court can no longer provide effective relief. *Eyman v. Ferguson*, 7 Wn.App.2d 312 (Div. II, 2019) citing *Spokane research & Defense Fund v. City of Spokane*, 155 Wn.2d 89, 99(2005) ”The central question of all mootness problems is whether changes in the circumstances that prevailed at the beginning of litigation have forestalled any occasion for meaningful relief.” *Gronquist v. Dept. of Corr.* 196 Wn.2d 564 (2020) quoting Vol. 13A Wright and Miller, FEDERAL PRACTICE AND PROCEEDURE, §3533.3 at 261 (2d ed. 1984)

- 1. Jerome Green’s appeal is not moot based on the death of Mary Green since this court can provide effective relief to Mr. Green by reversing, voiding or vacating the VAPO judgments entered against him so that his name can be removed from the state of Washington’s registry of abusers.**

WAC 388-71-01280 provides as follows:

The department will maintain a registry of final findings of abuse, abandonment, neglect and financial exploitation and, upon request of any person, the department may disclose the identity of a person with a final finding of abandonment, abuse, financial exploitation or neglect.

The department “must place the reported abusers’s name on a state registry.” *Crosswhite v. Dept. of Soc. & Health Servs.*, 197 Wn. App. 539 (Div. III, 2017) citing WAC 388-71-01280. “[S]ate law prevents such individuals from being employed in a position or holding a license that involves the care of vulnerable adults or children or from working or volunteering in a position giving them unsupervised access to vulnerable adults or child” *Crosswhite, id* citing RCW 74.39A.050(8). As noted in *Crosswhite, id*, these laws are mandatory. The death of Mary Green does not change the fact that Jerome Green’s name is (and will continue to be) listed in a statewide registry of abusers.

For a multitude of years now, Jerome Green, age 59 years, has involved himself in volunteer work in the local communities and

many of these events involve old people and children. The following is a partial list of some of these events:

- 1) Annual “stuff the bus” (winter clothing, sleeping bags, blankets, school supplies, nonperishable food supplies for children, at risk youth and senior citizens)
- 2) Annual Spokane Co. Sherriff’s office “Night out against crime)
- 3) Annual Aarons Furniture School supply drive.
- 4) Annual S.C.O.P.E (Sheriff Community Oriented Policing Effort) Family and Children Operation ID tag.
- 5) Annual Spokane Hoopfest (basketball tournament).
- 6) Annual Bloomsday Event (running race)
- 7) Annual Spokane Jr. League “touch a truck” event.
- 8) Annual Post Falls Community Library “fill the bus” event.
- 9) “Your time to shine” talent show (children and performing arts)
- 10) Regular and continuing“ learning by curiosity” production of videos to encourage children and young adults to choose various technical and skilled trades including public safety and emergency services career opportunities.
- 11) Fred Meyer’s customer appreciation days (garden dept).
- 12) Annual Napa Auto Parts car shows.
- 13) Annual Ron’s Drive-Inn “stuff the bus” (winter clothing, sleeping bags, blankets, school supplies, nonperishable food supplies for children, at risk youth and senior citizens)
- 14) Spokane Valley Partners “stuff the bus”
- 15) Kootenai Community Recovery Center (mental health issues)

- 16) Kootenai Community “Exposing Career Choices” (see appendix-article from Coeur d’Alene Press)
- 17) Spokane West Central Community Neighborhood Center (fund raising for West Central children).
- 18) North Central High School and Whitworth University “community in schools of Spokane”(fund raising)
- 19) Evergreen bus maintenance forum and Spokane Regional Transportation Council (educational).
- 20) New Hope Training Center (disabled students)

- 21) V.A. “learn to earn” program (children and seniors)

- 22) Video presentation for Spokane Fire Dept “fire science training and awareness” program.

If Jerome Green’s name is to remain on this state registry of “abusers” he will be prohibited from doing such volunteer work and his liberty interests will be adversely affected. For work that provides financial remuneration for Mr. Green his property interests will be adversely affected. See eg. *Crescent Convalescent Ctr. DSHS*, 87 Wn. App. 353 (Div. III, 1997)[due process required for constitutionally protected liberty or property interests] Thus, Jerome Green has a legalized “mark of Cain” effectively stamped upon his personage due to this unlawfully obtained VAPO. Both property and liberty interests are protected by the due process clause of the Fifth Amendment of the US Constitution. Jerome Green’s case is not moot and this court can and should still provide effective relief.

- 2. There are of issues of continuing substantial public interest that still exist and have not been mooted by the death of Mary Green and they need to be addressed by this court.**

Jerome Green listed the following issues in his Petition for Review:

1. The VAPO judgments entered against Jerome Green are null, void and without any legal effect due to lack of jurisdiction based on defective service of process on Mary J. Green.
2. Commissioner High-Edward's order to have Mary Green "re-served" with a second set of VAPO pleadings was an unlawful attempt to "bootstrap" jurisdiction for a case that was without jurisdiction at the inception due to defective service of process.

These issues that occurred at the trial court still exist and have not been "mooted" by the death of Mary J. Green. On Jan. 19, 2019 a VAPO proceeding was ostensibly commenced in Spokane County Superior Court. Jerome and Mary Green were served VAPO pleadings but the service of process on Mary Green was defective. After a couple of continuances the matter was set for an evidentiary hearing on Feb. 22, 2019. Jerome Green was unaware at that time that the initial service of process on his mother Mary Green was defective. Commissioner High-Edward noted the defective service on Mary Green when she reviewed the file (after order of remand from Judge Moreno) and issued her letter to the parties dated April 30, 2019. The commissioner was reviewing the file to prepare for Judge Moreno's order of remand and a hearing was scheduled for May 13, 2019.

RCW 74.34.120 (3) provides as follows:

When a petition under RCW 74.34.110 is filed by someone other than the vulnerable adult, notice of the petition and hearing ***must be personally served upon the vulnerable adult*** not less than six court days before the hearing. In addition to **copies of all pleadings filed by the petitioner**, the petitioner shall provide a written notice to the vulnerable adult **using the standard notice form developed** under RCW 74.34.115. (Emphasis added in bold and underline)

In this case the first declaration of service for Mary Green [CP 34-37] the SPD officer shows that he failed to serve Mary Green the “notice of rights for Vulnerable Adult” (RCW 74.34.305) as well as “other pleadings” required by RCW 74.34.120(3). In her letter dated April 30, 2019 [CP 171] Commissioner High-Edward pointed out these defective service of process and directed DSHS to essentially “recommence” this cause of action by having Mary Green served again this time with the “original petition” and the “notice of rights for vulnerable adults.” At the May 13, 2019 modification hearing after Mary Green had been “re-served” with a second set of VAPO pleadings on May 5, 2019 (RP 56, lines 19-20) commissioner High-Edward stated:

Sure. I don't think they filed a new petition. They just **re-served the original petition**, but yes the return of service generally you would get a copy.(Emphasis in bold and underline) RP p.57, lines 14-16

Thus the commissioner allowed DSHS to have a “do over” instead of dismissing this case for lack of matter jurisdiction which she

should have done at this May 13, 2019 hearing when the issue was raised and discussed by everyone.

The Div. III opinion of Feb. 9, 2021 states that this second service of process on Mary Green was authorized by RCW 74.34.120(4) and conferred jurisdiction on this case because it allows the court to “continue the case to allow for adequate service” (Op.5). The problem with this analysis is that the evidentiary hearing on Feb. 22, 2019 had already occurred before commissioner High-Edward discovered the defective service on Mary Green and shared this information with the parties via her letter of April 30, 2019. In effect then, the horse was already out of the barn. Testimony² had been heard and oral and written findings were made by the court and a judgment was entered against Jerome Green on Feb. 22, 2019

First and basic to any litigation is jurisdiction and first and basic to jurisdiction is service of process. *Dobbins v. Mendoza*, 88 Wn. App. 862 (Div. III, 1997) citing *Scott v. Goldman*, 82 Wn. App. 1, 6 (1996) When a court lacks in personam jurisdiction for a party any such judgment entered is void. *Dobbins, supra*. The

² Although exhibits were discussed during this hearing, none were offered or admitted as exhibits. (see Clerk minutes of hearing)

failure to accomplish personal service of process is not a defect that can be cured by amendment of paperwork. Errors in the form of original process are however, generally viewed as amendable defects so long as the defendant is not prejudiced thereby.

Sammamish Point Homeowners Assn. v. Sammamish Point LLC, 116 Wn.App.117 (Div. I, 2003) citing *Whitney vs. Knowlton*, 33 Wash 319, 322 (1903). The errors in this case were not mere matters of form but serious matters of substance (notice of vulnerable adult rights) required by RCW 74.34.120(3).

In his Petition for Review Jerome Green also listed the following issue and it has also not been “mooted” by the death of Mary J.

Green:

3. The majority opinion fails to state how it came to the conclusion that the VAPO statutes, RCW 74.34 et seq have “broad jurisdictional authority” even though these statutes involve “summary proceedings” and their interpretation must be “strictly construed” by the courts. This should be reviewed by this court as a matter of continuing and substantial public interest per RAP 13.4(b)(4)

The Div. III opinion in this case states that these VAPO statutes have “broad jurisdictional authority to adjudicate the petition.”(Op.

5). The majority does this without stating any supporting reasoning or citing legal authorities. In his Opening Brief (pg. 17) Jerome

Green set forth extensive argument and legal authorities showing that since these VAPO statutes involve “summary proceedings” they must be “strictly construed” and not broadly construed as concluded by the Div. III opinion. Jerome Green has argued that Washington’s Vulnerable Adult Protection Act is legislation involving **summary proceedings** and, as such, must be “strictly construed.” For example Div. III in *Commonwealth Real Estate Services v. Padilla*, 149 Wn. App. 757 (Div. III, 2009) held that RCW 59.12 (unlawful detainer action) involved summary proceedings which required the court to “**strictly construe**” these statutes. *Padilla*, *id* citing *Hartson Partnership v. Goodwin*, 99 Wn. App. 227, 235-36 (2000) Further in *Corning and Sons v. McNamara*, 8 Wn. App. 441 (1973) Div. III reviewed a temporary restraining order that had been served (pursuant to RCW 7.40.050) on the petitioner without prior notice and opportunity to be heard before his liberty and property interests were impacted by such an order. The petitioner had filed a motion to quash this TRO at the trial court level but his motion was denied. The Petitioner argued that the trial court erred in granting the ex parte restraining order prior to a contested hearing when “no emergency was alleged” and that by doing so the petitioner was deprived of due process of law

in the manner of *Sniadach v. Family Fin. Corp.* 395 U.S. 337 (1969); *Fuentes v. Shevin*, 407 U.S. 67 (1972) and *Lucas v. Stapp*, 6 Wn. App. 971 (1972). In his concurring opinion in *Corning and Sons v. McNamara*, *supra* Division III Judge Munson further held that there was not even a need to reach the constitutional issues for a reversal since simply failing to strictly comply with the statutory requirements (of RCW 7.04.050) alone was sufficient to warrant a reversal. Judge Munson took this position because these TRO statutes involve “**summary proceedings**” and, as such, are “**narrowly construed**” and there must be strict compliance with statutory requirements. *Barr v. Young*, 187 Wn. App. 105 (Div. III) citing *Munden v. Hazelrigg* 105 Wn.2d 39, 45 (1985). Here there was no “strict compliance” with the requirements of RCW 74.34.120(3).

IV. CONTINUING AND SUBSTANTIAL PUBLIC INTEREST

To determine whether the issue involves a matter of continuing and substantial public interest three factors are considered: 1) the public or private nature of the question presented 2) the desirability of an authoritative determination for the future guidance of public officers and 3) the likelihood that the question will recur. *State v. Beaver* 184 Wn.2d

321 (2015) The continuing and substantial public interest exception has been used in cases dealing with constitutional interpretation, the validity of statutes or regulations and matters that are sufficiently important to the appellate court. *Id at 331*

The issues listed by Jerome Green involved proceedings which occurred at the trial court level. These are issues that need to be addressed by this court since they are matters of continuing and substantial public interest. This court needs to issue a published opinion to clarify these issues to give future guidance to public officers involved in vulnerable adult proceedings. These issues were not rendered moot by the death of Mary J. Green. Indeed, they still exist and there is an undue risk of repetition and recurrence if not addressed by this court.

V. CONCLUSION

Mary Green's death does not "moot" the issues raised in Jerome Green's Petition for Review. These issues still exist and are likely to be repeated if this court fails to provide future guidance to public officers involved in VAPO proceedings. This court can still provide Jerome Green effective relief by reversing, vacating or voiding the VAPO judgments so that Jerome's name will be taken off the statewide registry of "abusers." The DSHS motion to

dismiss should be denied and Jerome Green's Petition for Review
should be accepted by this court.

SUBMITTED THIS 22 day of April, 2021



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DECLARATION OF SERVICE

I, Robert W. Critchlow hereby declare under penalty of perjury of
the laws of the State of Washington here in Spokane County, WA.
that I served Jerome Green's reply to DSHS answer and motion to
dismiss via regular mail on the following:

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DECLARED THIS 22 day of April, 2021



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APPENDIX TABLE OF CONTENTS

--News article from Coeur d'Alene Press "exposing career choices"

Exposing career choices

By BRIAN WALKER/Staff writer | Posted: Thursday, February 21, 2013 12:00 am

POST FALLS - Jerome Green wants to connect the dots between education and emergency careers.

His tool of doing so is a vocational video with interviews of the professionals.

Green is co-producer of a video that includes messages from Kootenai County Fire and Rescue Chief Warren Merritt and Post Falls Police Capt. Pat Knight.

"The video is intended to help students learn the value of vocational programs," Green said. "These people put their lives on the line, but they're also involved in community activities."

The video, which will be distributed to schools and posted on agencies' websites, is expected to be finished in April. Green and co-producer John Mashtare of Spokane County Fire are volunteering their time to produce it.

The video will include footage from a recent fire in Spokane.

Merritt calls the fire service a "noble profession."

"Citizens invite us in on their worst possible day and they trust us in our role," Merritt said. "There is such a trust among the public."

Merritt, a third-generation firefighter, said he was raised with the motto of service before self. That's what drew him to the fire career.

"I saw how important it was to my dad," he said. "He gave me a strong belief in public service. I've held that to this day. It's about helping neighbors in a time of need."

Knight said that, while there's plenty of unfortunate scenarios police come across, it's a rewarding career.

"It's definitely not about the pay; it's about making a difference in people's lives," said Knight, who has been in the profession for 19 years.

Green said he has learned how the fire and police department have collaborated for the common good.

Last year KCFR donated five automated external defibrillators (AEDs) - portable devices that treat patients in some emergency situations with electrical therapy - valued at \$1,200 each to the police department.

Such camaraderie is good for youngsters or those interested in the fields to know about, Green said.

The video also exposes the technical training, including swift water rescues and rappelling from cliffs, that is required of rescue responders today.



Exposing career choices

By BRIAN WALKER/Staff writer | Posted: Thursday, February 21, 2013 12:00 am

CONTINUED - "People do more daring things than they did before," Green said.

Green said the video project is also rewarding on a personal level.

Green said his son, Shawn, had a troubled background, but got on the right path thanks to a construction apprenticeship program.

He hopes the video will help steer students in the right direction, keep them out of trouble and expose them to vocational choices.

"You can lead them to the water, but you can't force them to drink," he said.

Green is also working on a documentary on the history of transportation in the region, dating back to the steamboats on Lake Coeur d'Alene, that is expected to air on KSPS later this year.

ROBERT W. CRITCHLOW

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