

Appellant's Brief

No 66853-6-1

IN THE WASHINGTON COURT OF APPEALS

At Division 1,

Alixandra Samantha Libin, Appellant

V

Spencer Dolder, Appellee

AN APPEAL FROM THE SUPERIOR COURT OF WASHINGTON

County of Skagit

Brief of Appellant

FILED
COURT OF APPEALS DIV 1
STATE OF WASHINGTON
2012 MAR 19 PM 12:09

TABLE OF CONTENTS

	Page
Assignment Of Error And Issues Presented For Review	
A. Assignment Of Error.....	1
B. Issues Presented For Review.....	2
Statement And Nature Of The Case.....	3
A. Procedural Facts.....	4
B. Substantive Facts.....	6
Argument	
1. The office of the Attorney General erred when in the Petition for Appointment of Guardian of a Person and Estate, when it listed several allegations made by respite provider Arianne Christensen which are unsubstantiated. Allegation number three actually contains numerous allegations.....	9
2. The court erred when it allowed the report of the Guardian Ad Litem, who is not a qualified expert, to become the factual standard in determining the Guardianship of Medically Complex, and Developmentally Disabled Spencer Dolder.....	10
3. The Guardian Ad Litum reiterated allegations made by respite provider Arianne Christensen, instead of seeking to determine the facts.....	12

4. The Guardian Ad Litem made recommendations based on incomplete information. The Guardian Ad Litem not ask the Appellant, Alixandra Libin about several important issues related to Spencer Dolder.....	14
5. The Guardian Ad Litem referenced allegations made by Thom Dolder, the father of Spencer Dolder, and by Thom Dolder's current wife with language that is not clear and thus denied the appellant and mother of Spencer Dolder the opportunity to address these allegations openly....	16
6. Spencer Dolder did not have the benefit of legal counsel to represent his likes dislikes and best interests.....	17
7. The court erred when it did not address the fact that Alixandra Libin stated in open court that she had been misquoted, and instead choose to continue the proceedings leading to this appeal..	19
8. The Guardian has placed Spencer Dolder in an Adult Family Home which is not the least restrictive environment and isolated Spencer Dolder from friends, family and regular activities.....	20
Conclusion.....	21-23
Relief Sought	24

TABLE OF AUTHORITIES

Guardianship of Stamm 121 Wn. App,830, 91. 3d 126
(2004).....Page 17

Statutes

11.88.045..... Page 17

11.92.043 (4).....Page 20

74.34.020 (c.).....Page 17 & 20

ASSIGNMENT OF ERROR AND ISSUES PRESENTED FOR
REVIEW

A. ASSIGNMENT OF ERROR

1. The office of the Attorney General erred when in the Petition for Appointment of Guardian of a Person and Estate, when it listed several allegations made by respite provider Arianne Christensen which are unsubstantiated. Allegation number three actually contains numerous allegations.

2. The court erred when it allowed the report of the Guardian Ad Litem, who is not a qualified expert, to become the factual standard in determining the Guardianship of Medically Complex, and Developmentally Disabled Spencer Dolder.

3. The Guardian Ad Litem reiterated allegations made by respite provider Arianne Christensen, instead of seeking to determine the facts

4. The Guardian Ad Litem made recommendations based on incomplete information. The Guardian Ad Litem not ask the Appellant, Alixandra Libin about several important issues related to

Spencer Dolder.

5. The Guardian Ad Litem referenced allegations made by Thom Dolder, the father of Spencer Dolder, and by Thom Dolder's current wife with language that is not clear and thus denied the appellant, and mother of Spencer Dolder, the opportunity to enter address these allegations openly.

6. Spencer Dolder did not have the benefit of legal counsel to represent his likes, dislikes best interests, and hoe he lives his life.

7. The court erred when it did not address the fact that Alixandra Libin stated in open court that she had been misquoted, and instead choose to continue the proceedings leading to this appeal.

8. The Guardian has placed Spencer Dolder in an Adult Family Home which is not the least restrictive environment and isolated Spencer Dolder from friends, family and regular activities.

B. ISSUES PERTAINING TO ASSIGNMRNT OF ERROR

1. Should the unsubstantiated allegations of respite provider Arianne Christensen, who attempted to persuade Alixandra Libin, the Appellant, to assist her in defrauding the State of Washington Out of money be used as grounds for an Order for Protection of a vulnerable adult?

2. Can the court's decision on the Guardianship of Spencer Dolder be considered unbiased given that the court had only the testimony of the Guardian Ad Litem upon which to base an objective decision?
3. Did the Guardian Ad Litem make a concerted effort to ascertain the facts before forming an opinion?
4. Were the recommendations made by the Guardian Ad Litem based on facts?
5. Should the report of the Guardian Ad Litem be allowed to be used as a vehicle of inadmissible hearsay?
6. Pursuant to RCW 11.88.045, can a person's right to be represented by counsel be ignored simply because that person is unable to speak?
7. Should the court consider statements falsely alleged to have been made by the appellant as part of the courts decision?
8. Pursuant to RCW 11.92.043 (4), has the Guardian failed to maintain Spencer Dolder in the least restrictive setting to his freedom and has the Guardian pursuant to RCW 74.34.020 (c) isolated Spencer Dolder from friends family and regular activities?

STATEMENT OF THE NATURE AND RESULT OF CASE

This is an appeal of a Guardianship and Order of Protection, established for a Medically Complex, Developmentally Delayed, and Incapacitated Individual, by his mother. The court relied exclusively on testimony of the Guardian Ad Litem who is not a qualified expert.

STATEMENT OF THE CASE

A. PROCEDURAL FACTS

On June 8, 2010, the office of the Jennifer A. Boharski, in the office of the Attorney General, did file a Petition for the Appointment of Guardian of Person and Estate in Seattle, Washington.

On August 13, 2010, Guardian Ad Litem Jeremy Yates conducted an interview of the Appellant and her son at their new home at 40 Skokomish Way, La Conner, Washington.

On December 9, 2010, the Appellant's son was removed from the home he shared with his mother and placed into an Adult Family Home in Edmonds Washington.

On December 10, 2010, Appellant appeared before the Honorable Susan B. Cook, Superior Court Judge for the County of Skagit, State of Washington, along with Sarah Reyes of the office of the Appellant's Opening Brief - 4

Attorney General. The court ordered a hearing on January 7, 2010.

On December 10, 2010 a copy of the report of the Guardian Ad Litem was delivered to the Appellant.

On December 17, 2010, Lisa Keller of the office of the Attorney General appeared before the Honorable David M. Grant, Commissioner for the County of Skagit, State of Washington. The court ordered a continuation of the protection order effective until January 7, 2011.

On January 7, 2011, Appellant appeared before the Honorable Susan K. Cook, Judge for the County of Skagit, State of Washington, along with Lisa Keller of the office of the Attorney General, and Jeremy Yates, Guardian Ad Litem, Ascension Law. The court accepted the Guardian Ad Litem's recommendation to appoint Inslee Maxwell as the Guardian of Spencer Dolder and reissued the temporary protection order.

On February 18, 2011, Cindy Maxwell of Inslee, Maxwell & Associates and the Appellant appeared before the Honorable John M. Meyer, Superior Court Judge for the County of Skagit, State of Washington. The court joined the order of protection to the Guardianship and extended the order of protection for one year.

Appellant's Opening Brief - 5

B. SUBSTANTIVE FACTS

This is an appeal of a guardianship of Spencer Dolder who is Medically Complex and Developmentally Delayed. Spencer Dolder does not have a comprehensive diagnosis. He does have a collection of congenital birth defects, which as listed on the Medical and Psychological report, c.p. 17-20, which include hypo thyroidism, hypo parathyroidism, gastro esophageal reflux, cardiac anomalies and developmental delay. There is nothing to indicate to the appellant, Alixandra Libin that the Guardian Ad Litum understands the significance of these facts.

The fact of the matter is that Spencer Dolder does not have a Thyroid Gland or any of the four Para Thyroid Glands which sit anterior to the Thyroid Gland. The function of the Para Thyroid Gland is the calcification of bones. Spencer Dolder does not have any parathyroid glands. 2-18-2011 tr. p. 12. Consequently Spencer Dolder has fragile bones. Due to fragility of his bones, Spencer Dolder has sustained bone fractures. This is a fact known to the Doctor's who provide medical care for Spencer Dolder.

Alixandra Libin was present when the fractures occurred, but

Appellant's Opening Brief - 6

Alixandra Libin was not the cause of the fractures. The cause of the fractures is soundly rooted in the nature of Spencer Dolder's endocrine system. 2-18-2011; tr. p.12

Pursuant to RCW 11.88.045 Spencer Dolder was not represented in court. Alixandra Libin did make every effort to secure independent legal representation for Spencer Dolder.

However, her diligent efforts were unsuccessful. The fact that securing legal representation in matters of this nature is difficult has been acknowledged by the court. 2-18-2011; tr.p.21

Due to the fact that Spencer Dolder was not represented, significant facts were not presented for the courts consideration. The most egregious of these facts has to do with the cancellation of Spencer Dolder's court ordered medical coverage, due to the failure of Thom Dolder to pay for the coverage. Termination of medical coverage for Spencer Dolder occurred immediately before the first fracture.

Alixandra Libin did attempt to present this information to the court by way of subpoena. However this effort was not successful.

The logical person to be the Guardian of Spencer Dolder is his mother Alixandra Libin. It should be noted that during the early Appellant's Opening Brief - 7

days months and years of his life, the doctor's who cared for Spencer, did express concerns about whether he would survive or not. Due to the care which Alixandra Libin has provided for Spencer from birth forward, Spencer Dolder has not only survived he has thrived.

Alixandra Libin, mother of Spencer Dolder, did not succeed in filing a petition to become the guardian of Spencer Dolder, prior to the petition filed by the state, due to the consequences of years of harassment by the father of Spencer Dolder. 1-7-2010; tr. p. 6; 2-18-2011; tr.p.10. These consequences include but are not limited to, foreclosure rescue fraud, 2-18-2011; tr. p. 7 thru tr. p. 8; and a forced and chaotic move from Seattle to La Conner. Coinciding with the need to suddenly move, Spencer Dolder became eighteen years old. The fact that Alixandra Libin became eligible to be a paid parent provider once Spencer reached his eighteenth birthday, was interpreted by Arianne Christensen Spencer Dolder's State of Washington funded respite provider, as a threat to her job and source of income.

The Argument

1. The office of the Attorney General erred when it did not consider the possibility that the Allegations listed in the Petition For Guardianship of Spencer Dolder might be false even though Alixandra Libin had requested a Fair Hearing. Item Three lists several allegations made by Arianne Christensen.

a. The majority of these allegations are made by respite provider Arianne Christensen who was angry when Spencer Dolder reached the age of eighteen and his mother, Alixandra Libin, the Appellant, became eligible to be a paid provider.

b. Arianne Christensen believed that if Alixandra Libin, the Appellant became a paid provider that her Arianne Christensen's hours would be cut.

c. Subsequently, Arianne Christensen asked Alixandra Libin to sign worksheets which she Arianne Christensen submitted for payment of services, which falsely claimed hours which Arianne Christensen did not work.

d. Alixandra Libin, the Appellant, explained to Arianne Christensen that claiming to have worked hours that in fact she did

not work was illegal.

e. Arianne Christensen then filed a report with APS.

The petition for Appointment of a Guardian of a Person and Estate, lists two other issues under number three which are not accurate.

f. First; "Mr. Dolder's care plan indicates that he needs 24-hour line of sight supervision." The Department of Social and Health Services uses an assessment tool referred to as an Individual Support Plan, or ISP. When completed the ISP is a document of thirty or more pages. There is no reference to "line of sight" in this document or any other known to Alixandra Libin.

g. Second; "Ms. Libin has physical limitations making it unsafe for her to transfer Mr. Dolder on her own." This statement was made by a CPS case worker who happened to response to an unfounded allegation, at a time when the Appellant had a minor wrist injury, and was prudently wearing a wrist brace to prevent further injury. The aforementioned statement is not accurate.

2 The court decided the Guardianship of Medically Complex and Developmentally Delayed Spencer Dolder solely on the recommendations of the Guardian Ad Litum

a. The GAL did obtain a Medical Report as required. c.p. 17-20

Appellant's Opening Brief - 10

However, there is nothing to indicate that the GAL understands the significance of the information contained in that report.

b. The court abused its discretion ruling on the recommendations of the GAL who is not a qualified expert. The Guardian Ad Litem did not identify the nature of "intentional harm" or investigate possible medical explanations even though the Spencer Dolder is known to be medically complex.

c. The fact of the matter is that Spencer has a lifelong diagnosis of Hypo Thyroidism and Hypo Para Thyroidism. 2-18-2011; tr. p. 12. This is clearly reflected on the "Medical Evaluation Report" submitted by the Guardian Ad Litem c.p. 17-20 Spencer Dolder does not have any Thyroid Gland tissue whatsoever, and therefore, he also does not have the four parathyroid glands which sit on top of the thyroid gland.

d. The function of the Para Thyroid Gland, through a complex feedback mechanism, is calcification of bones. In fact Spencer Dolder did when he was a child sustain a tibia fracture followed by a femur fracture in 2006. 1-7-2010; tr. 6 and 2-18-2011; tr. p.12 .

e. The Guardian Ad Litem is a lawyer, and has no expertise in

Appellant's Opening Brief - 11

the area of Developmental Delay or Medical Complexities.

3 . The Guardian Ad Litum did not ask questions or in anyway attempt to verify the information in his report.

In his report the GAL states;

“She has been found to have neglected Spencer by leaving him alone for periods of time to run truly essential errands. I view this particular example of errand running and leaving Spencer alone, as indicative not of neglect so much as of the fact that Ms. Libin is overwhelmed and unable to cope with all of the household and care related tasks that must be done.”

Here the GAL did not have all of the facts and consequently makes an assumption. The single occasion when Ms. Libin left Spencer is in fact the subject of the Fair Hearing requested by Ms. Libin.

The fact is that Alixandra Libin was in a double bind due to requirements put upon her by the State, as well as the budget cuts enacted by the State. These coinciding circumstances place Alixandra Libin in a situation completely beyond her control. These circumstances were:

a. The budget strapped State of Washington repeatedly delayed the approval of the medication needed to prevent Spencer’s Reflux.

Appellant’s Opening Brief - 12

Without this medication Spencer would require hospitalization.

- b. Spencer had again broken the telephone. (His favorite “toy”)
- c. The State provided Respite Person had failed to come to work.

In his Report the GAL also states;

“Problematically Ms. Libin has stated that she does not wish to have any other state supported caregivers regularly caring for Spencer and she certainly has deficit of trust in potential outside caregivers or state involvement.”

Here the GAL has assumed that Alixandra Libin will not accept state supported caregivers of any kind.

- a. Alixandra Libin did state that she would not accept state supported care givers that were not adequately screed and trained.

This was a qualified statement, not a carte blank pronouncement.

- b. Alixandra Libin has long been of the opinion that respite providers are underpaid and therefore under qualified. Experience has shown the Appellant, that at the very least respite providers, should be better screened, and better trained.

- c. Alixandra Libin is of the opinion that respite providers should also be drug tested.

- d. Alixandra Libin has voiced these concerns to DSHS case

Appellant's Opening Brief - 13

workers repeatedly, only to be labeled as difficult.

The voters of the state of Washington seem to agree with the concerns expressed by Alixandra Libin. In our last election we saw ballot Initiative 1163 passed.

To be perfectly clear, Alixandra Libin will accept properly screened and trained respite providers.

4. The Guardian Ad Litem made recommendations based on assumption.

The Guardian Ad Litem did not have all of the facts regarding the care Spencer Dolder received from his mother from the time of his birth until the two hour interview conducted by the Guardian Ad Litem. The Guardian Ad Litem drew conclusions from the limited information he did have, and made recommendations accordingly.

The Guardian Ad Litem not ask the Appellant, Alixandra Libin about several important issues related to Spencer Dolder.

In his report the GAL states that;

“Spencer likely needs regular physical therapy, speech therapy, and occupational therapy, and would likely benefit from these therapies.” c.p.12-13

Appellant's Opening Brief - 14

- a. The Guardian Ad Litem did not ask Alixandra Libin about physical therapy, occupational therapy, or speech therapy.
- b. Spencer Dolder has had the benefit of these therapies throughout his life through a variety of sources.
- c. The oddity of the Guardian Ad Litem's statement lies in the fact that the GAL does in fact reference in his report, c.p. 12-13, "she wishes to create an area where a safe swing can be erected for Spencer." Alixandra Libin did tell the Guardian Ad Litem about the adapted tricycle which she had for Spencer Dolder. Alixandra Libin even accompanied the Guardian Ad Litem out the door of her home so that she could show him the adapted tike which was in her mini-van. The Guardian Ad Litum even commented, saying "Oh that's very cool."

Perhaps the Guardian Ad Litum is not aware that swinging (Vestibular Stimulation), and Tike Riding are forms of physical therapy.

In his report the Guardian Ad Litum states: c.p. 12-13

"As time passes and her age advances, Ms. Libin will no longer be able to care for Spencer."

Here again the GAL did not ask Alixandra Libin what arrangements

had been made for Spencer's future with regards to the passage of time.

a. Alixandra Libin has made providing for Spencer Dolder's lifelong care a priority from the time of his birth on. To that end, the home which Alixandra Libin purchased in La Conner has a full daylight basement with a fireplace, three bedrooms and a private bath. This home will easily allow a live in provider to provide care for Spencer if and when Alixandra Libin is no longer able to care for him, and following the advent of the death of his mother. 2-18-2011 tr. p. 8, and 2-18-2011; tr. p.20

b The comfort of living in familiar surroundings, sleeping in his own bed, and having access to his therapeutic and recreational equipment will surely lessen the anguish of loss when that time comes.

5 The Guardian Ad Litum has reiterated allegations using language that is not clear.

In his report the GAL states:

"Spencer's father, Thom Dolder, and father's wife believe and expressed to the GAL that they believe Ms. Libin has in the past hurt Spencer on purpose in order to get in the way of his visits with

Appellant's Opening Brief - 16

his father.” The Guardian Ad Litem’s report also states, “Without regard to Mr. Dolder’s allegation that Ms. Libin was hurting Spencer to get in the way of visits,...or her counter allegation that Thom Dolder has abandoned Spencer, it is clear that Spencer ought to have a relationship with both of his parents.” C.p. 12-13

- a. The Guardian Ad Litem gives no specific indication what is meant by the word hurt. The word “hurt” has numerous definitions, meanings, and inferences. The use of such vague language did present an obstruction to any possible presentation of the facts during the Guardianship hearing on January 7, 2011
- b. Without a clear and cogent presentation of facts, the decision of the court regarding who should be the Guardian of Spencer Dolder, can not be considered valid.

In Guardianship of Stamm 121 Wn. App,830,91 P.3d 126 (2004)
“The Guardian Ad Litem’s testimony must not be used as a vehicle to present and reiterate otherwise inadmissible hearsay.”

6. Spencer Dolder was denied representation by council pursuant to RCW 11.88.045.

In his report, the Guardian Ad Litem did make reference to this fact.

C.p. 12-13.

Appellant’s Opening Brief - 17

In his report the Guardian Ad Litum states;

“Spencer would not be able to communicate any preferences or wishes to an attorney, therefore an attorney would not be able to represent Spencer.”

- a. Here the Guardian Ad Litum assumes that because Spencer Dolder is non-verbal his wishes cannot be considered.
- b. There are plenty of people who have known Spencer Dolder longer than the scant two hours the Guardian Ad Litum spent with him.
- c. An attorney could easily interview teachers, physical therapists and doctors who have worked with Spencer over the years. An attorney could interview people who know Spencer through participation in programs such as Outdoors For All as well as friends and neighbors. The aforementioned individuals who have known Spencer Dolder over a period of time and are far better qualified to speak for Spencer Dolder than the Guardian Ad Litum.
- d. Alixandra Libin, the mother of Spencer Dolder did make every effort to secure counsel for Spencer Dolder, 12-17-2010; tr., p. 5; and 12-17-2010; tr. p. 14; and 2-18-2011, p.5.

If Spencer could speak it is illogical that he would tell the court, "I want to go live with complete strangers, isolated from my mother and all of the things I am familiar with. I want to spend a great deal of my time without any kind of stimulation to help me develop new skills and to keep my mind engaged." It is hard to imagine that anyone would want this for themselves or for anyone that they love. However, this is the reality of Spencer's life now. Spencer Dolder deserves to have a say about how he lives his life.

7. Alixandra Libin has been misquoted in open court. The statement, "I brought him into the world and I can take him out." was not made by Alixandra Libin.

a. The very notion that Alixandra Libin would even think of undoing years of hard work and the resulting successes which she and Spencer have accomplished together is egregiously illogical.

b. When Alixandra Libin attempted to correct the misinformation the court replied saying, "I'm not looking at a decision on that this morning." And "All. Right. We're not going to have a hearing on that right now." 1-7-2011, tr.p.21 and p.22.

c. Alixandra Libin has not been able to identify the source of the statement. However, knowing who in fact has alleged that

Alixandra Libin made such a statement, would likely be revealing.

8. The Guardian has inappropriately isolated Spencer Dolder by placing him in an Adult Family Home In Renton, which pursuant to RCW 11.92.043 (4), is not the least restrictive setting and pursuant to RCW 74.34.020 (c) inappropriately isolated Spencer from friends, family and regular activities.

a. Spencer deserves to be maintained in the least restrictive setting, where he has access to his therapeutic tools, such as adaptive tike riding, and vestibular stimulation, and where he has access to therapeutic activities such as adaptive skiing, horseback riding, etcetera.

b. The Adult Family Home in Renton is close to Thom Dolder, the father of Spencer Dolder. Even though it would be easy for Thom Dolder to visit Spencer he does not do so.

c. As of March 15, 2012 Thom Dolder has not visited Spencer since on or before September 10, 2011.

d. Spencer Dolder is currently isolated from his mother who is realistically is his only family and from the activities he once enjoyed. Pursuant to RCW 74.34.020 (c) "Mental Abuse" means any willful action or inaction of mental or verbal abuse.

Petitioner's Opening Brief - 20

The Conclusion

The Superior Court for the State of Washington abused its discretionary review by allowing the Guardian Ad Litem's testimony to become the factual standard. In his report the Guardian Ad Litem addressed concerns regarding the physical well being of the Appellants son. However, no consideration was given to his psychological or emotional well being, even though Spencer Dolder is non-verbal and developmentally delayed.

Spencer is now living in an Adult Family Home in Renton. His housemates include an elderly woman named Betty who suffers from COPD, an elderly woman named Thelma who is a relatively functional stroke survivor, an elderly woman named Adel who is a catastrophic stroke survivor, and a young woman named Elizabeth who suffers from psychological issues which require that she be supervised.

The Appellant (Spencer's Mother) has been told by two of the residents of the Adult Family Home that in the morning when the school bus arrives Spencer makes a bee-line for the door. Given the fact that Spencer is non-verbal and cannot state with words his preferences, attention must be paid to his actions.

Appellant's Opening Brief - 21

Spencer's actions are clearly saying, "Let Me Out Of Here!"

Spencer deserves better. It is not enough to "warehouse" Spencer in a nicely sanitized house, feed him and attend to his most basic hygiene. Spencer deserves the opportunity to experience as much of the world as possible. Sitting on the floor of an Adult Family Home with three elderly women who pass their days watching movies and cooking shows on television, does not qualify as experiencing as much of the world as possible.

I humbly request that the court look at the bottom line in this matter. In fact, the bottom line is the bottom line. All of the misery that has surrounded Spencer for the past thirteen months stem from one thing. That one thing is money. The fact is that Thom Dolder, does not want to pay child support. Thom Dolder is required to pay child support as long as Spencer resides with his mother. Let's take money out of the equation in a way that makes sense.

Instead of warehousing Spencer in an Adult Family Home, a condition under which Spencer's father, Thom Dolder does not have to pay child support to Spencer's mother, Alixandra Libin, Spencer should be returned to live with his mother and the child support provision should be removed. This scenario also saves

Appellant's Opening Brief - 22

the budget strapped State of Washington money as well. The cost of warehousing Spencer in Renton is substantial.

Consideration should also be given to the fact that even though Spencer now lives in Renton and close to his father, Spencer's father, Thom Dolder, does not visit Spencer. As of March 15th, 2012 Thom Dolder had not seen Spencer since the early part of September 2011.

The Guardian has in fact isolated Spencer from his mother, his only family. Spencer's father, who does not visit Spencer, even though Spencer now lives only a short distance from him, has once again abandoned Spencer.

Above all else what must be considered is that Spencer Dolder is not a commodity. Spencer is a Human Being and His Life Has Value. He deserves to live his life in an environment where he is not only loved but cherished. That Life is with his mother.

Relief Sought

The Logical person to be the Guardian of Spencer Dolder is his mother Alixandra Libin. Therefore, I Alixandra Libin, petition the Court of Appeals to return Spencer to his home with his mother and appoint Alixandra Libin, mother of Spencer Dolder, as Guardian of Spencer Dolder.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge

A handwritten signature in black ink, appearing to read 'Alixandra Libin', written in a cursive style.

Alixandra Libin Pro Se
Dated this 15th, day of March, 2012
At LaConner WA.