Appeal No. A142355

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

FIRST APPELLATE DISTRICT, DIVISION FOUR

In Re Y.V., a minor.

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff and Respondent,

v.

Y.V.,

Minor Defendant and Appellant.

AMICUS CURIAE **BRIEF OF YOUTH LAW CENTER IN SUPPORT OF APPELLANT Y.V.**

On Appeal From the Superior Court of California
County of San Francisco, Case No. JW146087
The Honorable Suzanne R. Bolanos, Judge

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YOUTH LAW CENTER

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Amicus Youth Law Center submits this brief in support of Appellant's position that the juvenile court's disposition of Y.V. was contrary to law and should be overturned.

STATEMENT OF ARGUMENT

This case is about the Superior Court's obligation to protect the best interest of the children before that court. In the matter currently pending before this Court, the Superior Court failed to satisfy that obligation. The juvenile court system failed to uphold the best interests of this child, Y.V., by erroneously releasing him into the custody of federal immigration authorities in violation of his best interest. But for that improper ruling by the Superior Court, Y.V. would have been under the continued care and support of the California juvenile system and could have petitioned for Special Immigration Juvenile Status and begun forging a path to U.S. citizenship. Instead, Y.V. was transferred to ICE custody and subsequently released and is now without the care and supervision of the California juvenile justice system.

The minor, appellant Y.V., is an 18-year-old from Tegucigalpa, Honduras. Due to his mother's financial troubles he was raised by his grandparents. Because of the proclivity of gang violence in Honduras, Y.V. left his grandparents' home and came to the United States in June 2013. When he first moved to the United States, Y.V. lived with his cousin; however, his cousin soon returned to Honduras, leaving Y.V. without any familial support. Thereafter, Y.V. bounced from state to state, seeking work and safe lodging.

On April 2, 2014, while living and working in Oakland, California, Y.V. was arrested. The next day, he entered an admission to possession of a controlled substance and was referred to probation for a disposition report. The probation report recommended that the court order Y.V.

committed to juvenile probation and subsequently released to ICE custody. Before the disposition hearing, Y.V. filed an Alternate Disposition Memorandum and a proposed order for Special Immigration Juvenile Status ("SIJS") findings by the court. (S*ee* 8 U.S.C. § 1101(a)(27)(J).)

A child subject to deportation may be reclassified as a "special immigrant" for purposes of receiving SIJS if the juvenile court makes findings that the child: (1) is under age 21; (2) is unmarried; (3) has been declared dependent; (4) has been deemed eligible for long-term foster care; (5) continues to be dependent on the juvenile court and eligible for long-term foster care; and (6) has been before a court that has determined it would not be in the child's best interest to be returned to his county of origin or to his parents. (*See* 8 C.F.R. § 204.11(c); *In re Leslie H.* (Cal.Ct.App. 2014) 168 Cal.Rptr. 3d 729, 735.) A juvenile who obtains SIJS may "remain in the United States and seek lawful permanent resident status if federal authorities conclude that the statutory conditions are met." (*In re Interest of Erick M.* (2012) 820 N.W.2d 639, 641.) Put simply, obtaining SIJS can change the course of an immigrant child's life.

As part of his Alternate Disposition Memorandum, Y.V. presented ample information supporting his request for SIJS findings, including information regarding the lack of resources for minors in ICE custody. For example, children under ICE custody often lack appropriate juvenile housing and educational and social opportunities. Y.V. also requested either placement in a foster care home or alternate placement in a local facility that could provide him resources while he pursued SIJS. While the juvenile court did make findings regarding Y.V.'s SIJS eligibility and determined that it was not in Y.V.'s best interest to return to Honduras, the court nevertheless ordered Y.V. to return to custody and then be released directly to ICE custody. The judge acted on the mistaken belief that he did not have the discretion to provide Y.V. with an alternative placement in the

face of an ICE detainer request. The judge made a grave error by acting directly contrary to the best interests of Y.V. The judge also failed to follow state and local law regarding the proper basis for detaining juvenile immigrant children.

In California, children receive special protections under the law that may not apply to adults. This is especially true for juveniles who come under the jurisdiction of the California juvenile court. California law requires that children under the juvenile court's jurisdiction "receive care, treatment, and guidance consistent with their best interest and the best interest of the public." (Cal. Welf. & Inst. Code, § 202(b).) Juveniles who fall under the jurisdiction of the juvenile court based on delinquent conduct also must "receive care, treatment, and guidance that is consistent with their best interest," as well as care, treatment, and guidance "that holds them accountable for their behavior, and that is appropriate for their circumstances." (*Id.*)

What's more, California recently passed both state and local laws that aim to prevent the release of juvenile immigrants into ICE custody after those juveniles become eligible for release from juvenile custody. (*See* San Francisco Admin. Code Ch. 12I.3 (Due Process for All Ordinance ("DPFA")); Cal. Gov't Code, §§ 7282, 7282.5 (the "TRUST Act").) These laws protect the best interests of juvenile immigrant children by prohibiting their detention "on the basis of an immigration hold after the individual becomes eligible for release from custody" where such detention would violate a state or local law. (Cal. Gov't Code, § 7282.5 (adopting the DPFA into state law); *see also* San Francisco Admin. Code, Ch. 12I.3(a).) Consequently, these laws allow juvenile immigrants like Y.V. to remain under the protection of California state laws, which offer the possibility of resources, education, and rehabilitation to certain, qualifying, juvenile offenders from outside the United States.

We file this amicus petition in support of appellant Y.V., and others like him, in order to show that the Superior Court failed to protect the best interests of this child, as required by California law. Not only did the juvenile court err by releasing Y.V. into ICE custody; the court had *no discretion* to order his release based on the SIJS findings and the controlling state and local law that prohibited Y.V.'s release. In addition, the court failed to consider that neither ICE nor ORR[1] offers a placement that satisfies the requirements of California Welfare and Institutions Code. The Superior Court also acted under the mistaken impression that placing Y.V. in a placement as required by the Welfare and Institutions Code would have interfered with his SIJS application. Such failures demonstrate the Superior Court did not consider all of the necessary facts to determine the best interest of Y.V., thus its decision is improper and should be reversed and remanded with instructions. While ICE is obligated to release minors to ORR, ORR is charged with providing a temporary placement with family, if possible, or to find another temporary placement for the minor.[2] ORR, however, is not obligated to comply with the standards set forth in California's Welfare and Institutions Code which requires that if possible, a permanent placement be found.

[1] "ORR" refers to the Office of Refugee Resettlement, which is the federal agency ICE transfers all minors to once they release them from custody.
[2] The *Flores* settlement agreement establishes national policy regarding the detention, release, and treatment of minors in ICE custody. Many of the agreement's terms have been codified in 8 C.F.R. §§ 236.3 and 1236.3.

I. THE COURT FAILED TO PROTECT THE BEST INTEREST OF THE CHILD THROUGHOUT THE PROCEEDINGS AS REQUIRED BY CALIFORNIA LAW

A. It Was Improper for the California Superior Court to Adopt the Juvenile Probation Department's Recommendation and Order That Y.V. Be Held an Additional Four Days for Transfer to ICE Custody

1. This Was Not in Y.V.'s Best Interest Because ICE is Not Required to Comply with California's Best Interest Obligations

As a federal agency, ICE operates with a completely different agenda than the California juvenile justice system. As such, ICE is not obligated to comply with California state law requirements directing that the best interest of the child be pursued in various matters, including the placement of juvenile immigrants. For one, ICE has its own interests when it comes to non-citizens who are present in the United States. These interests include repatriation, or "planning and coordinating removals across the country and developing and implementing strategies to support the return of all removable aliens to their country of origin."[3]

In this case ORR did not find a family or other placement for Y.V., instead they simply released him, in effect making him homeless. This treatment was not in his best interest and certainly did not comply with California law.

This schism between ICE and juvenile immigrants is especially glaring when a child such as Y.V. has petitioned the court for Special Immigrant Juvenile Status and offers evidence that repatriation would not be in his best interests. It is no secret that gang violence is increasingly prevalent throughout Honduras, especially in major cities such as

[3] U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, "What We Do," http://www.ice.gov/repatriation.

Tegucigalpa.[4] As a result, unaccompanied minors such as Y.V. are streaming across the U.S. border in unprecedented numbers. Between January and June of 2014, at least 3,000 unaccompanied minors from Honduras entered the United States.[5]

As part of Y.V.'s Alternate Disposition Memorandum, he submitted relevant and instructive information on the current political situation in Honduras, as well as evidence of his experience as an unaccompanied minor in the United States. Y.V. himself fled Tegucigalpa in 2013 to evade the threat of gang violence and gang indoctrination. Yet, while the juvenile court sympathized with Y.V.'s story, it incorrectly believed it did not have the authority to place Y.V. under the custody of the California juvenile justice system given ICE's hold request, and Y.V. was held and transferred to ICE.

In addition to the fact that ICE (and ORR) does not have to comply with California law, ICE (or ORR) has no prerogative or mandate to act in the best interests of children like Y.V., as defined under California law. Thus, the federal immigration system simply does not provide the same protections to unaccompanied children in its actual or constructive custody that California law provides. Under California state law, dependent children are entitled to the following services that are not available in the federal system: monthly visits from the child's social worker; judicial review of the child's status at least once every six months; the right to placement in foster care; the right to contest a placement order or seek a

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[4] *See, e.g.*, Frances Robles, *Fleeing Gangs, Children Head to U.S. Border*, NYTIMES.COM (July 9, 2014), http://www.nytimes.com/2014/07/10/world/americas/fleeing-gangs-children-head-to-us-border.html.

[5] *See* Haeyoun Park, *Children at the Border*, NYTIMES.COM (Oct. 21, 2014), http://www.nytimes.com/interactive/2014/07/15/us/questions-about-the-border-kids.html.

change of placement in a judicial proceeding; the selection and implementation of a permanent plan if the child cannot be safely reunited with a parent; and access to services commensurate with the child's best interests until the age of 21. (*See* Cal. Welf. & Inst. Code, §§ 361.2, 361.3, 366(a), 366.21, 366.22, 366.26, 388, 16001.9, 16516.5.) Section 16001.9 in particular lays out the incredible and far-reaching "bill of rights" for California minors and non-minors in foster care. (Cal. Welf. & Inst. Code, § 16001.9.) These rights and protections demonstrate California's dedication to child welfare and the best interests of children.

California courts and the Juvenile Probation Department ("JPD") can not abdicate their responsibility under California law by concluding that since the minor has been flagged by ICE to have immigration issues, that releasing minors to ICE is in the child's best interest, and is a proper placement. Therefore, the juvenile court erred when it abdicated its responsibility over Y.V. by failing to provide a proper placement as required by California law and releasing him to ICE custody.

2. This Was Not in Y.V.'s Best Interest Because ICE Is Not Charged with Finding a Proper Placement for the Child, Unlike the Court and the Juvenile Probation Department ("JPD")

Y.V. petitioned the court for two alternate placements. First, he requested that the court place him on non-wardship probation and compel foster care placement by the Human Services Agency. Alternatively, he requested that the juvenile court declare wardship and order him committed to an Out of Home Placement (OHP). Both of these placements were proper under California law, and either would have been sufficient to uphold Y.V.'s best interests.

When Y.V. was held until he could be released to ICE custody following the hearing on alternative disposition and SIJS findings (and the

remainder of his custody in a juvenile detention center), ICE was under no obligation consider all of the factors important under California law when determining the disposition of a minor. ICE was charged with detaining Y.V. for the purpose of determining his immigration status and eligibility to remain in the United States, and then releasing Y.V. to ORR. ORR is only a temporary placement and it is obligated to release minors whenever possible.[6] After initially detaining Y.V., ICE transferred him to ORR, who ultimately released Y.V. into homelessness, and failed to provide any of the protections that are available under California law.[7] The transfer to ICE custody and the subsequent "placement" with ORR denied Y.V. the services and protections provided to minors under California law. If Y.V. had remained under the care of the California juvenile justice system, he would have had access to a social worker, placement in the foster care system or an out of home placement—all the while being provided the opportunity to seek SIJS relief through the immigration system.

B. The Superior Court Improperly Concluded That the ICE Hold Request Preempted State Law Regarding the Best Interest of the Child

The Superior Court improperly concluded that it had no discretion to refuse ICE's hold request – when in fact the discretion the Court actually lacked was the discretion to turn Y.V., or a similarly situated child, over to ICE at all.

It is true that federal law often preempts state and local law when the latter attempts to occupy a space typically held by the federal government. It is also true that immigration is traditionally a "federal" area of law. However, state and local jurisdictions are not required to cede all authority

[6] *See, e.g.*, 8 CFR §§ 236.3 and 1236.3.
[7] *See, e.g.*, Cal. Welf. & Inst. Code, §§ 361.2, 361.3, 366(a), 366.21, 366.22, 366.26, 388, 16001.9, 16516.5.

to the federal government, especially when the government has merely requested them to act.

The record from the Superior Court reflects that the judge did not believe she had the authority to grant Y.V.'s alternate disposition request. At one point, the judge stated, "I cannot order a State agency to violate federal law . . . . So I don't believe that I have any choice here but to allow Probation, who currently has custody of the minor, to release him to the federal authorities." RT 33-34. The judge then stated, "My hands are tied." (*Id.*) It is clear from this language that the Superior Court Judge erroneously concluded that she had to release Y.V. pursuant to ICE's detainer request.

What the Superior Court lacked was the discretion to *release* the minor to ICE at all. While the Superior Court Judge concluded that she had no discretion to refuse ICE's hold request for Y.V., in fact, the court lacked discretion to turn over Y.V., or any other similarly situated child, to ICE. Every federal court of appeals to consider the issue has determined that an ICE detainer request is just that: a request. (*See, e.g., Galarza v. Szalczyk* (3d Cir. 2014) 745 F.3d 634, 640-41 (citing to and agreeing with other circuit courts that have interpreted ICE detainer requests as permissive, not mandatory).) In addition, no provisions of the Immigration and Nationality Act[8] authorize the federal government to command local or state officials to detain suspected "aliens" subject to removal. (*Galarza*, 745 F.3d at 640.) Finally, ICE itself has consistently held that its detainers are requests, not commands. (*See Galarza*, 745 F.3d at 641.)

In addition, the court lacked discretion to release the appellant to ICE custody because both state and local law required the Superior Court to place Y.V., and minors like him, in the custody of the juvenile justice

[8] 8 U.S.C. §§ 1101 *et seq.*

system. In fact, both the California TRUST Act and the San Francisco DPFA Ordinance provide that JPD and juvenile courts are prohibited from detaining children in response to ICE detainer requests.

The DPFA states that "a law enforcement official shall not detain an individual on the basis of a civil immigration detainer after that individual becomes eligible for release from custody." (San Francisco Admin. Code, § 12I.3(a).) In certain limited circumstances, which are not applicable here[9], law enforcement officials may continue to detain an individual pursuant to a civil immigration detainer *for up to 48 hours* after that individual is eligible for release. (*Id.* at § 12I.3(b).) Nothing about Y.V.'s situation or his minor drug possession charge satisfied the limited exception permitting him to be released to ICE custody under the DPFA. Thus, the Superior Court had no authority to release Y.V. to ICE custody.

The TRUST Act provides that "an individual shall not be detained on the basis of an immigration hold after the individual becomes eligible for release from custody," unless that individual meets any of the enumerated reasons under Section 7282.5(a). (Cal. Gov't Code, §§ 7282, 7282.5.) At that point, an individual can only be detained pursuant to an immigration hold "if the continued detention of the individual on the basis of the immigration hold would not violate any federal, state, or local law, or any local policy . . . ." (Cal. Gov't Code, § 7282.5(a).) The TRUST Act was passed in response to the DPFA and was intended to mirror and support the ordinance. As under the DPFA, the Superior Court had no authority to release Y.V. to ICE custody because his drug possession charge did not meet the requirements for continued detention under the

[9] Essentially, subsection (b) only applies to detainees who have committed a violent felony or to individuals who are suspected of having committed violent felonies. Here, Y.V. was picked up on a minor drug possession charge.

TRUST Act. Again, the Superior Court lacked complete discretion to turn over Y.V. to the federal immigration authorities.

As a consequence of the court's failure to follow either the TRUST Act or the Due Process for All Ordinance, Y.V. was ordered to be released directly to ICE custody upon termination of his term at Juvenile Hall. Unfortunately, since he was transferred from ICE custody to ORR and subsequently released rather than remaining under the jurisdiction of JPD, Y.V. was not provided any of the protections for juveniles mandated by California law, and he was simply released rather than being provided an adequate placement.

C. When Probation Notified ICE That Y.V. Was in Custody, This Violated California State Law to Protect the Confidentiality of the Proceedings

Y.V.'s right to confidentiality was violated when the JPD notified ICE of his identity and the location of his custody. Unfortunately, the court's failure to address this led the court to tacitly condone the violations of state law by the JPD.

Under California law, it is prohibited to disclose "any information pertaining to a juvenile, including any information indicative of the juvenile's immigration status." (*See* Cal. Welf. & Inst. Code, § 827; *see also*, Cal. Const., Article 1, Section 1.) Once a juvenile's immigration status is disclosed to federal authorities, it could trigger deportation proceedings. Moreover, it could stigmatize the individual and prevent him or her from seeking or receiving sorely needed rehabilitative services. Releasing a juvenile's immigration status to federal authorities is also likely to create a chilling effect for other juveniles who fear deportation if they are honest about their circumstances. And most importantly, it places the juvenile's immigration status above his or her status as a minor, which goes

directly against California's stated goal of maintaining confidentiality of minors and advocating for the best interests of juveniles.

While JPD's and the court's breach of Y.V.'s confidentiality cannot be undone, the court's decision can. It is in Y.V.'s best interests for the court to reverse the Superior Court's dispositional order and remand with instructions to follow applicable California law, so that Y.V. may receive the protections afforded to juvenile immigrants under such laws.

II. BECAUSE THE COURT'S ORDER REGARDING THE ADDITIONAL FOUR (4) DAYS WAS IMPROPER AS A MATTER OF LAW, THIS COURT SHOULD REVERSE THE SUPERIOR COURT'S ORDER AND REMAND WITH INSTRUCTIONS TO FOLLOW APPROPRIATE CALIFORNIA LAW

A. The Superior Court Did Not Have Discretion to Order That Y.V. Be Held and Turned Over to ICE

As previously discussed, the juvenile court exceeded its authority when it ordered Y.V. detained for an additional four days and released to ICE for deportation screening. As a matter of law, the juvenile court lacked the discretion to make that decision. Courts must act within their powers and cannot exercise powers they do not possess. Under this universal principle, juvenile courts may only enter a disposition allowed by California law. The California legislature has enumerated only five permissible sanctions under juvenile law:

> (1) Payment of fines by the minor[;]
>
> (2) Rendering of compulsory service without compensation performed for the benefit of the community by the minor[;]
>
> (3) Limitation on the minor's liberty imposed as a condition of probation or parole[;]

> (4) Commitment of the minor to a local detention treatment facility, such as juvenile hall, camp, or ranch[; or]
>
> (5) Commitment of the minor to the Division of Juvenile Facilities, Department of Corrections and Rehabilitation.

(Cal. Welf. & Inst. Code, § 202(e).)

Nowhere in the statute does it allow for a disposition which releases the minor to the Department of Homeland Security or ICE. Further, honoring the ICE hold order was prohibited by state and local law, as discussed *infra*. As the California courts have recognized, a "court's authority to make any and all reasonable orders for the . . . custody of a ward is confined to the custodial dispositions provided for in . . . the Welfare and Institutions Code." (*In re Kenny A.* (2000) 79 Cal.App.4th 1, 7 (internal quotations omitted).) Detaining the ward for additional time in order to release him to a federal agency is not a custodial disposition provided for in the Welfare and Institutions Code, and as such, any court disposing of a case in that manner has exceeded its authority. An ICE detention facility is not a juvenile hall, camp or ranch; neither is it the Division of Juvenile Facilities. ICE detention facilities serve a different purpose and are not intended to rehabilitate or serve the child's best interests as required by California law. It is not the court's prerogative to decide the full array of places to which a ward may be committed. (*Id.* at 7–8.) The California legislature has limited the court's options, and it chose not to include ICE, or any other federal agency, in that list. Just as the court in *Kenny A.* found that the juvenile court lacked the discretion under § 202(e) to sentence an eighteen-year-old defendant to county jail for an offense committed as a minor, the court here lacked the discretion to dispose of Y.V.'s case by ordering him held an extra four days for ICE.

To the extent his disposition included the ICE hold, that disposition was not authorized by § 202(e). As a matter of law, the court lacked the discretion to enter a disposition detaining Y.V. for ICE under § 202(e) of the Welfare and Institutions Code.

Further, as mentioned above, release of Y.V., and others like him, to ICE violates the San Francisco DPFA and the California TRUST Act. Unless a violent felony is involved, the San Francisco DPFA mandates that "a law enforcement official shall not detain an individual on the basis of a civil immigration detainer after that individual becomes eligible for release from custody." (San Francisco Admin. Code, § 12I.3(a).) The ICE hold was a civil immigration detainer, and Y.V. was eligible for release at the time he was detained. In ordering Y.V. detained for an additional four days for ICE, the juvenile court effectively ordered a violation of local law. The California TRUST Act allows law enforcement officials the discretion to detain for ICE a person eligible for release only in a set number of circumstances involving violent crimes and felonies, none of which are involved in this case. As JPD did not have the discretion under the TRUST Act to detain Y.V. pursuant to the ICE hold, the court did not have the authority to order JPD to act in violation of California law. The California TRUST Act and DPFA provide that, as a matter of state and city law, JPD and juvenile courts are prohibited from detaining Y.V. and children like him in response to ICE hold requests.

B. The Superior Court's Order Must be Reversed and the Matter Remanded to the Superior Court With Instructions

The appellate court should reverse the Superior Court's dispositional order because as Appellant's brief asserts, such order was and is counter to Y.V.'s best interest which includes pursuing SIJS relief and potentially obtaining a permanent placement. The appellate court should reverse and

remand for further determination, with instructions to the Superior Court – *i.e.*, to issue a new order making certain findings and clarifying the disposition of Y.V. that are consistent with Y.V.'s best interest as determined under California law.

It is within the authority of this court to reverse the erroneous order below. In California the appellate courts have broad powers in the disposition of appeals. Pursuant to California Code of Civil Procedure section 43, the courts of appeal "may affirm, reverse, or modify any judgment or order appealed from…" (*See, also American Enterprises, Inc. v. Van Winkle* (1952) 39 C.2d 210, 219 ("The constitutional and statutory provisions which empower this court to affirm, modify or direct the entry of a final judgment are to be liberally construed to the end that a cause may be disposed of on a single appeal.").) It is settled law that "Courts are not limited to merely striking illegal portions, on remand the trial court may reconsider all sentencing choices." (*People v. Burbine* (1st App. Div. 2003) 131 Cal.Rptr. 2d 628, 633, *citing People v. Hill* (Ct.App.2d Dist. Div. 5 1986) 185 Cal.App.3d 831, 834.) That quote appears repeatedly in cases, and similar language appears in the treatise California Jurisprudence: "where a portion of an order is beyond the authority of the court and therefore void, the reviewing court will reverse that portion and remand the cause with appropriate directions." (Cal. Jur. 3d, § 698.)

Since the disposition ordering Y.V. detained pursuant to the ICE hold was improper as a matter of law, the court should reverse the order and remand with instructions to make its order comply with Y.V.'s best interest which includes pursuit of adjustment through the SIJS process and consideration of a placement under California law standards.

III. CONCLUSION

For all the reasons set forth above, this Court should find that the Superior Court erred when it concluded it was compelled to hold Y.V. until he could be transferred to ICE. Accordingly, the disposition order of Y.V. should be reversed, and the matter remand with instructions to issue an order consistent with Y.V.'s pursuit of SIJS relief and the Superior Court's and the probation department's obligations to consider appropriate placements under California law.

Dated: March 4, 2015

Respectfully submitted,

BAKER & MCKENZIE LLP

By: /s/ Keith L. Wurster
Keith L. Wurster

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YOUTH LAW CENTER

CERTIFICATE OF COMPLIANCE

I, Keith L. Wurster, as counsel of record for Appellant, hereby certify, pursuant to California Rules of Court, rule 8.204, that the foregoing Appellant's Opening Brief is proportionally spaced, has a typeface of 13 points or more, and contains 4,506 words, including footnotes. In making this certification, I have relied on the word count feature of the computer program used to prepare the brief.

Dated: March 4, 2015

BAKER & MCKENZIE LLP

By: /s/ Keith L. Wurster
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PROOF OF SERVICE

I, Robin M. Robledo, declare: I am employed in the County of Santa Clara, California. I am over the age of 18 years and not a party to the within action. My business address is 660 Hansen Way, Palo Alto, CA 94304.

On March 4, 2015, I served the following:

***AMICUS CURIAE* BRIEF OF YOUTH LAW CENTER IN SUPPORT OF APPELLANT Y.V.**

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Palo Alto, California, on March 4, 2015.

Robin M. Robledo