

FILED

08/16/2024

Bowen Greenwood
CLERK OF THE SUPREME COURT
STATE OF MONTANA

Case Number: DA 23-0436

IN THE SUPREME COURT OF THE STATE OF MONTANA

Cause No.

DR-23-359
No. 23-0436

JENNIFER BRICK., S.D. and B.D.

Petitioners, pro se

V.

RICHARD DUCHARME

Respondent.

APPELLANT'S REPLY BRIEF

**DISMISSAL OF ORDER OF PROTECTION FOR S.D., and B.D., &
DISMISSAL OF ORDER TO EXTEND ORDER OF PROTECTION FOR B.D.**

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Retained legal team for 5 years

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AUG 16 2024

Bowen Greenwood
Clerk of Supreme Court
State of Montana

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I. INTRODUCTION

Your Honors, this Reply Brief addresses the significant legal errors and oversights in the district court's proceedings, which unjustly led to the termination of the appellant, Jennifer Brick's, parental rights. The Response Brief filed by the appellee fails to substantively address several critical issues raised on appeal, implicitly conceding those points. Moreover, the Response Brief inadequately defends the district court's decision, which was marred by procedural irregularities, judicial bias, constitutional rights violations, and improper application of the law. This Reply Brief will demonstrate,

through relevant Montana and United States Supreme Court precedents, that the district court's decision must be reversed to protect the appellant's constitutional rights, to end ongoing harm to the children, and to ensure justice is served. **Therefore, the Order of Protection on S.D. (18 years old) and B.D. (17 years old) must be vacated and the mother and children reunited without delay, as the children have endured forced, total separation by the government from their mother without notice, for over 15 months, under threat of arrest, without even goodbyes, without the mother's consent, and despite her repeated objections.**

II. REVIEW OF PLEADINGS & THE FACTS

This case appeals the unethical legal tactic used by attorneys, called the "Silver Bullet," where they bring a known false criminal charge in order to flip custody. However, in this case, the Dodd Law Firm and Judge Breuner willfully disregarded DV laws meant to protect women, and instead placed an Order of Protection solely on the children to effectively terminate parental rights by surprise by deceptively bypassing the due process all Montana parents deserve when terminating rights, including; notice, pleadings, state appointed attorney, investigation, higher level of evidentiary scrutiny, etc., after the mother and children were placed in duress from a false charge and unlawful arrest. Judge Breuner even stated in his Order that the criteria for an Order of Protection were "irrelevant." In fact, Judge Breuner's scant Order merely inferred his dislike of his political opponent, Ms. Brick, and ordered her banned from the community, and zero contact with her children under threat of arrest until the children are out of state

and in college - 2 years from then. Judge Breuner disregarded the mother's testimony that she merely took the phone away from S.D., a lawful act. Judge Breuner then closed the case to just the pro se mother after learning she obtained surveillance proving the perjured TRO Petition by the Dodd Law Firm. Then, Judge Breuner, via a later Ex Parte Order that blocked the return home of the younger daughter B.D., effectively terminated the parental rights of the younger daughter with an "indefinite" Extension, which would end only if I won the Appeal. This OP was then used by the father to make repeated false reports to law enforcement to harm the mother, all of those alleged "violations" of the OP were later dismissed. Nonetheless, Judge Breuner then granted a 2nd Ex Parte Order allowing the father to approve the taking of any items he chose from the mother's post-divorce home, stealing her property.

Due to the complexity and length of this Case, which concerns the arrest and surprise termination of parental rights, using a severe, lengthy Order of Protection, immediately after her testimony to the MT Legislature for the winning judicial reform Bill, HB 322, by her political opponent, Judge Breuner, please see the attached **Exhibit A** showing a "Timeline" of the Facts of the Case, many of which were only available after the TRO surprise termination of parental rights Hearing by my political opponent.

III. SUMMARY OF ISSUES

- 1) Violation of Due Process: Parental rights can not be terminated without notice, without state counsel, and without a full plenary hearing, as occurred in this case.

- 2) Improper Use of Orders of Protection: Orders of Protection (OP) can not be used to terminate parental rights by being placed on minor children alone without simultaneously protecting a parent who was able to prove to the court repeated, severe physical violence toward the adult, and only then may children be included in the Order protecting the parent.
- 3) Improper Use of Orders of Protection: A parent can not ask the family court to block the other parent from contacting a child after they turn 18, by requesting an OP on that child into adulthood, blocking contact from age 17-20 years old.
- 4) Violation of Due Process: The court can not terminate parental rights for a second child via an Ex Parte Order, by “extending” an improper OP on just a child, without a Hearing.
- 5) Coercion: The Court can not order that a parent might be able to see her younger child again, but only if the pro se mother wins an Appeal.
- 6) Constitutional Rights: The Court can’t restrict the movement, effectively banning a parent, from an entire community for 2 years, nor can the court order the father be allowed to steal any property he wants from the mother’s post divorce home.
- 7) Judicial Bias, Attorney & Law Enforcement Misconduct: The appellant’s rights were compromised due to judicial bias, and misconduct which was not addressed in the Response Brief which influenced the outcome of the TRO Hearing.

A. Silver Bullet - Unethical & Punitive Legal Tactic to Flip Custody via an Unlawful OP

The "Silver Bullet" tactic refers to an unethical legal strategy often employed in high-conflict family law cases, where a family law attorney colludes with a prosecutor to file false criminal charges against one parent. The primary objective of this tactic is to facilitate a rapid custody flip in favor of their client by misusing legal mechanisms such as an Order of Protection (OP). This approach typically involves making unsubstantiated allegations of abuse or violence to obtain a temporary restraining order, which effectively blocks the accused parent from any contact with their children. Outrageously in this case, a parent did not make a false claim they were harmed by the other parent, rather, the parent merely alleged the other parent harmed the child one time when they were not present. Furthermore, it is a known tactic to delay resolution throughout the proceedings, including this Appeal, after custody is flipped, often until kids are over 18, to delay reuniting the mother and children or in this case to sever all contact permanently, per the father's request, effectively completing the permanent abduction of the children.

This tactic has also been misused in cases of political retaliation, where arrests and restraining orders are leveraged to silence and intimidate political opponents. The use of the "Silver Bullet" thus not only undermines the integrity of the legal system but also weaponizes legal processes meant to protect the vulnerable, turning them into tools of injustice and coercion. As in this case, parents, advocates, and leaders across the state and the United States were shocked and appalled that Judge Bruener would use a "restraining order" to block his political opponent from the community, and punitively from her own children, immediately after he lost in his opposition to Ms. Brick and HB 322.

Courts and legal professionals must be vigilant in recognizing and condemning the use of such tactics, as they erode public trust in the legal system and cause immeasurable harm to innocent individuals and their families. The “Silver Bullet” was used by the Dodd Law Firm intentionally as a means to block due process by avoiding a full plenary hearing to terminate parental rights, and because evidence of the mother’s innocence and the fact of the original false criminal charge being meritless, were not available or resolved until after her parental rights were terminated via the TRO Hearing.

In fact Montana Case law has ruled that parent’s awaiting criminal trial are still afforded access to their children, because they are only allegations. For instance, in the case of **In re D.H. (2022)**, the Montana Supreme Court allowed a parent to maintain contact with their children despite pending criminal charges, emphasizing the importance of evaluating specific circumstances of each case, and the significance of parental rights.

B. Jurisdiction

The Montana Supreme Court has the authority to discipline attorneys and judges, including during or as a result of the appellate process. The court can act on complaints, including those that arise during the course of an appeal. In addition, the United States Supreme Court has held that courts have inherent authority to discipline attorneys and judges to maintain the integrity of the judicial process. This principle was established in cases such as *In re Snyder* (472 U.S. 634, 1985), where the Supreme Court acknowledged that federal courts possess the inherent power to regulate the conduct of attorneys and

ensure proper behavior within the court system. Therefore, if misconduct by an attorney or judge is identified during an appeal, they may take appropriate disciplinary action.

The Montana Supreme Court has already created precedent that when a judge commits gross injustice by the sudden total removal of children without due process, then that Judge should be removed. In the recent case of **Manywounds v. 20th Judicial District Court, OP 23-629**, the Montana Supreme Court addressed the abrupt and unexpected transfer of custody of a child during a custody hearing. The court found that the lower court's decision to grant custody to the father, who had not previously spent significant time with the child, constituted a "gross injustice." The Montana Supreme Court found that Judge Deborah Kim Christopher's decision to abruptly transfer custody of a child from the mother to the father without proper notice or adherence to legal standards constituted a "gross injustice." The ruling emphasized that the decision was contrary to the best interests of the child and violated procedural fairness. As a result, the Supreme Court took the extraordinary step of removing Judge Christopher from the case and reassigned it to another judge. **This ruling addressed the same issue in this Appeal.**

Similarly in this case, after being under duress from a false charge and arrest, the children were removed from their life-long custodial parent, their mother, without notice, without goodbyes, without adequate counsel, without learning of the false charge, and with any contact under threat of arrest, for 2 years - until age 20, by the Appellant's very own political adversary, Judge Breuner, immediately after the mother testified to the

Montana legislature for judicial reform. Judge Breuner publicly opposed her Bill but lost, yet remained on her case, an act which citizens across Montana were appalled by.

IV. FINAL REPLY BRIEF - LEGAL ARGUMENT

The Appellee's three primary arguments are that: 1) Judges (and attorneys) have discretion to **not** follow Montana Law, and 2) the Appellee followed all proper TRO paperwork procedure thus due process was afforded, and 3) the testimony from a witness tampered minor who was suddenly blocked from and misinformed about her custodial mother, plus testimony from the non-custodial father who was not present for the alleged incident, was sufficient to prove the horrifically violent, injurious assault alleged in the Petition for TRO, justifying the termination of parental rights by surprise via an OP placed just on the children. The Appellee conceded all other appealable issues.

A. Conceded Issues

Upon reviewing the Appellee's Brief, it is evident that certain crucial issues raised on appeal were not addressed by the appellee in their Response. According to legal principles, a failure to respond to issues raised on appeal may be considered a concession.

1. Judicial Bias and Conflict of Interest:

- The appellant argued that Judge Breuner, who had a clear conflict of interest due to prior participation in public political opposition and lost against the Appellant, and refusal to recuse himself, and who demonstrated prior and ongoing consistently unfavorable rulings toward the pro se mother via denial of due process, and even wrote a scant, vague, punitive

1-page order terminating her parental rights, exhibiting judicial bias, fundamentally compromised the fairness of the proceedings. The Response Brief did not address or rebut these allegations, which can be seen as a concession that bias did influence the proceedings. This is critical, as the Montana Supreme Court has held that a judge's failure to recuse himself when there is an appearance of bias constitutes grounds for reversal (*Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009)), and an integral part of the Judicial Canons which require fair hearings for all Montana citizens, even pro se mothers, and for advocates for judicial reform.

2. Misuse of the Order of Protection Process:

- The appellant asserted that the TRO Hearing was improperly used to terminate parental rights without the required due process, and an OP improperly placed solely on children, in violation of Montana Law. The Response Brief did not adequately address this argument, suggesting an implicit concession that the TRO Hearing and OP was used incorrectly only on children, in violation of due process rights, and Montana Law, to deceptively terminate parental rights, as recognized under *Santosky v. Kramer*, 455 U.S. 745 (1982). All attorneys and many parents in Montana know that Orders of Protection can not be placed solely on children, but the Dodd Law Firm and Judge Breuner willfully disregarded this law. The Response Brief's failure to address this misuse suggests concession.

3. False Criminal Complaint, Perjury & Police Misconduct:

- The appellant alleged that the Dodd Law Firm engaged in unethical conduct by working with the Prosecutor to file a known false criminal complaint with process service failure to have his opposing party unlawfully arrested and cause duress in the children, and then used perjury to obtain a TRO, to deceptively obstruct the relationship with and block all contact between the mother and daughters, and then witness coached the older daughter prior to the TRO Hearing without the custodial mother's permission or access, and then proceeded to ultimately terminate parental rights by surprise by having the father ask for 2 years of no contact, without any notice of this request prior to the hearing. Furthermore, the appellant cited the fact that numerous charges were brought against the mother with no police interview or investigation while she was detained. The Response Brief did not directly refute these serious allegations, indicating a concession that these unethical actions occurred and negatively impacted the outcome of the proceedings, which would justify reversing the lower court's decisions based on procedural misconduct (*State v. Gallagher*, 2001 MT 39). under *Santosky v. Kramer*, 455 U.S. 745 (1982).

4. Ineffective Assistance of Counsel:

- The appellant alleged in her pleadings that her one-off attorney was ill prepared to handle family law arguments, as this TRO Hearing was held to solely address the evidence of a severe violent assault on a minor. This

attorney objected when the Hearing digressed into past family allegations, as more appropriate for a “Contempt” Hearing. This attorney otherwise seemed incapable of mounting a defense, including not addressing the mother’s concerns in an opening statement, and failing to cite the legal flaw inherent in the proceedings - that OP’s can not by law be placed on children, or to terminate parental rights. The Appellee failed to address this serious lack of adequate defense, thereby conceding the issue.

5. Failure to Recognize Relevant Recent Case Law & Pertinent Montana

Law:

- The appellant alleged in her pleadings that the Montana Supreme Court (and U.S. Supreme Court) has already ruled repeatedly, including in a case with this same Judge Breuner, that due process must be upheld in matters pertaining to the government’s interference in parental rights, and moreover that Judges should be investigated and removed when willful actions are taken to deny parental rights which cause harm to Montana families. The Appellee failed to argue the case law protecting the fundamental right of parents to due process and the right to direct the care and education of their children, which is to be considered a concession of the major, inherent flaw in the proceedings. The most recent cases substantiating the reversal in this case are:

- i. Manywounds v. 20th Judicial District Court, OP 23-629

ii. A.J.B. and O.F. v. 18th Judicial District Court (regarding Judge Breuner), 2023, OP 22-621*

- **Selectively ignoring MT Law:** The Appellant argued that Judge Breuner was required to be well versed in all Montana Law and not selectively apply some law while ignoring other. The Appellee failed to address this, showing he conceded this issue. In this case Judge Breuner has intentionally not followed these Montana Laws to serve his desired outcome including; MCA 3-1-803, MCA 41-3-422, MCA Rule 60, MCA 45-3-107, MCA 45-3-104. Judge Breuner, and the one-off attorney, failed to address a parent's right to discipline, and a citizen's right to defend property (the mother's phone for the child's use). In fact Judge Bruner deemed a mother had no right to have contact with her own children, no right to discipline, even no right to her own personal property (her phone, and property inside her own home - ruling the father could enter and steal her property). The Appellee failed to address the selective use of Montana Law, thereby conceding this issue.

B. Reply to Appellee's RESPONSE to Issues on Appeal

1. Judicial Discretion and Order of Protection:

- The Appellee's Response Brief primarily argues that the district court had broad discretion in granting the Order of Protection, when acting to protect the welfare of children. However, the district court's discretion is not unlimited. The Montana Supreme Court has ruled that discretion must be

exercised within legal bounds, and failure to do so constitutes an abuse of discretion (*State v. Redding*, 283 Mont. 265 (1997)). The district court's reliance on uncorroborated testimony, ignoring contradictory evidence, the father acting as biased "medical expert," and being discriminatory in its weighing of evidence, and failing to cite findings justifying the criteria for an OP, further highlights this abuse. The courts have consistently held that judicial discretion is bound by the requirement to apply the law correctly and to uphold constitutional protections. The following case law supports the Appellant: *In re Marriage of Engen*, 278 Mont. 472, 925 P.2d 55 (1996), *State v. Mercier* (2021), *City of Bozeman v. Dumas, III* (2021), *State v. Byrne* (2021), *State v. Colburn*, *Beehler v. Eastern Radiological Assoc.*, 2012 MT 260, *Caperton v. A.T. Massey Coal Co., Inc.*, 556 U.S. 868 (2009), *State v. Lamoureux*, 2021 MT 42, 403 Mont. 237, 480 P.3d 150, *State v. Pedersen*, 2002 MT 205, 311 Mont. 351, 55 P.3d 611, *Marbury v. Madison*, 5 U.S. 137 (1803).

- In fact, Judge Breuner's discretion appears to show his bias. In his Order he stated "the Court knows the Appellant well," yet he intentionally failed to refer in his Order an additional obvious legal motive for the father's false allegation which was to block the financial hearing scheduled by Judge Breuner one week away, granted by Judge Breuner and on the docket, which was to address the father's "Failure to pay support for 12 months."

- In terminating the custodial mother's rights, Judge Breuner in his "discretion" failed to investigate or inquire about ANY of the 17.5 year history of the Appellant being the children's full-time custodial mother to these successful, well-adjusted teens. In fact he references some of their accomplishments in his Order as if the mother's parenting did not contribute, and was irrelevant. Clearly, Judge Breuner appears to believe mothers are irrelevant to teenage daughters, showing his extreme bias.
- **Blocking Objections:** Furthermore, Judge Breuner used his "discretion" to deny the mother's request to speak at the end of the hearing to bring up the important issues left out by her one-off Attorney, and to object to all of the egregious due process errors, such as the financial matter, and no visitation allowed. However, Judge Breuner appeared to want to block objections and facts from being entered on the record, by denying her opportunity to speak, again showing his bias against the Appellant.
- Furthermore, Judge Breuner's Order to terminate parental rights was glaringly vague. If exercising "discretion," Montana courts have emphasized that judicial orders must be thorough and provide specific findings that clearly explain the court's reasoning as it applies to the law. **If an order is overly sparse or fails to cite relevant findings as they apply to the law, it can be grounds for reversal.** For example, in Eschenbacher v. Anderson, the Montana Supreme Court reviewed an order that lacked sufficient detail and failed to properly interpret the contractual obligations

of the parties involved. The court stressed the importance of clear findings to support a judicial decision, and this principle has been applied broadly to ensure that parties understand the legal basis for the court's rulings.

These cases collectively illustrate that in Montana, testimony by a father who wants to flip custody, regarding an alleged "assault" in which he was not present, with any "medical knowledge" he may have being deemed biased, and without any corroborating evidence of the witness tampered teen's testimony, who was suddenly blocked from speaking to her custodial mother and given misinformation about her, particularly when contradicted by opposing testimony from the only adult present at the alleged incident - the custodial mother, would be deemed insufficient to meet the burden of proof required in legal proceedings, especially when the mother testified that she merely took the phone she owns and supervises the use of from her daughter, which is a lawful act, and testimony of the other mothers stated was a "lawful" act, and which she after the hearing obtained surveillance to prove to be the case, and when this 5-second encounter is the primary event to terminate parental rights by surprise, shows bias.

In this case Judge Breuner failed to list how his findings applied to Montana Law, and cites no evidence meeting the criteria by Law for an Order of Protection, or to use his "discretion" to terminate parental rights and block all contact between mother and children into adulthood, under threat of arrest. In fact his only claim, besides disparaging my "personality" was to list the word "abuse" referencing the perjured Petition for TRO filed by the Dodd Law Firm and father in June. He lists no

other findings or conclusions that meet the criteria for an Order of Protection, or how it could be placed solely on children, or for the extreme total termination of parental rights with zero contact under threat of arrest until age 20, or explain the severity of violence & threat of harm warranting a total ban from the community for 2 years.

These cases collectively demonstrate that judicial discretion is constrained by the law and by the Constitution, and if used must be thoroughly explained and justified. Judges cannot choose to disregard legal requirements or violate constitutional rights, including the right to due process, at their whim, and fail to justify it in an Order. When they do, their decisions are subject to reversal on appeal.

2. Procedural Compliance and Due Process Violations:

- The Response Brief claims that the district court and Dodd Law Firm adhered to procedural rules and provided proper notice and hearings.

However, the appellant contends that she was not informed in advance that the TRO hearing would address termination of parental rights, nor was she informed that the father would ask for no contact until daughter turns 20 under threat of arrest, nor was she informed her minor child would be coerced to testify by the Dodd Law Firm, nor was she allowed to speak to her minor child prior to the Hearing, nor was she provided with the necessary legal representation required when terminating parental rights, thereby violating her due process rights as established in *Mathews v. Eldridge*, 424 U.S. 319 (1976). Furthermore, the

appellant was denied a meaningful opportunity to defend against the termination of her parental rights, as the hearing digressed from its original purpose to address only the criteria for an Order of Protection for a violent assault on an adult, highlighting a significant procedural failure. The “one-off” attorney hired by the Appellant the day prior to the TRO Hearing, to defend only against the alleged “violent assault” with no evidence, which was listed in the Petition for TRO, which was the only criteria for an OP per MT Law, was unfamiliar with any of the family history, nor did he even seem aware of Montana Law regarding Orders of Protection, **but he did timely Object that the digression of the Hearing into past family issues from Ex Parte Motions was more appropriate for a family “Contempt” Hearing.**

- **Lastly, the entire point of a TRO Hearing is to vet the evidence to substantiate any claim made in the Petition for TRO.** In this case the teen girl’s testimony failed to corroborate the event stated in the Petition, therefore the Judge should not continue with an order of Protection after 21 days of no contact. Furthermore, if there were concerns about previous “abuse” alleged in previous Ex Parte Orders then an Abuse and Neglect Hearing should have been scheduled per MCA 41-3-422, to allow for due process and to protect parental rights.

3. Misapplication of the Order of Protection Statute: MCA § 40-15-102 does not support using an Order of Protection solely on children, when not used to protect an adult, and when it is instead used to sever all contact between a parent and children, to terminate parental rights without due process. The law is clear that an OP can only be applied for a parent if there is substantial evidence that the other parent poses an immediate physical danger, and only then can children be included. The district court's application of the OP statute to place only on the children to terminate parental rights by surprise and block a parent from her children under threat of arrest, without proper legal proceedings and notice, was a misuse of the statute, warranting reversal (*State v. Haviland*, 333 Mont. 411, 144 P.3d 1245 (2006)). Additionally, the appellant argues that the OP statute is designed to protect adults from physical immediate harm, not to be used as a tool to resolve custody disputes or terminate parental rights without notice or due process.

- **The Appellee is disingenuous when he describes having followed proper procedure for a TRO Hearing and it was necessary to protect the “safety of the children.”** What he failed to argue is that OP's are not by Montana Law to be placed on children alone, because doing so deceptively bypasses the constitutional right of parents to due process when any government interference in custody takes place, especially to terminate parental rights. A TRO Hearing designed to quickly protect women from an eminent violent encounter, with minimal evidence required, is a fundamentally deceptive mechanism when used

instead to terminate parental rights because it blocks due process procedures required for parents by Montana Law when terminating rights. The father neither requested nor listed any physical threat to himself, justifying an OP.

- In fact, the Dodd Law Firm botched their Silver Bullet attack by failing to anticipate I would obtain surveillance proving their perjured TRO Petition, but the surveillance wasn't available until after the TRO Hearing. This is precisely why the use of TRO Hearings to terminate parental rights is unethical, and precisely why the Dodd Law Firm used it - because it blocks due process guaranteed all parents by MT Law and the Constitution.

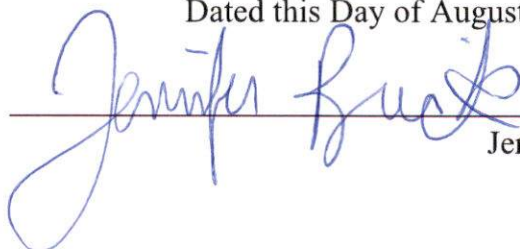
V. CONCLUSION

The district court's decision to terminate the appellant's parental rights through a misapplied Order of Protection, without adequate procedural and constitutionally protected safeguards for the parent such as notice or a state attorney, with insufficient and conflicting evidence, with only a scant and vague Order, and amidst clear judicial bias, constitutes a violation of due process. The Response Brief's failure to address these critical issues further solidifies the appellant's claims. Therefore, this Court should reverse the district court's decision, vacate the improperly issued Order of Protection and Extension, and remand this case for proceedings consistent with the principles of fairness, equity, and justice as mandated by Montana and United States Supreme Court law.

VI. THEREFORE, IT IS REQUESTED THAT IT BE ORDERED THAT:

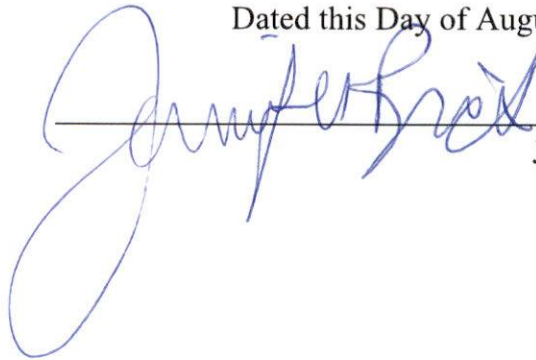
1. The children be returned to the mother, the custodial parent, and make up time begin, effective immediately. A return to the Revised Final Parenting Plan can be addressed at any future hearing requested by either party.
2. The communication be reinstated between the mother and older child S.D, who has now been trafficked out of state, to repair contact, and to restore the mother's right to communication.
3. The belongings of the mothers' which were stolen by the father and by Bozeman BPD during their unlawful warrantless entry of her home, be returned immediately.
4. The father reinstate the state-deducted child support effective immediately, and this amount, and pay back, be addressed at any future hearing.
5. The hearing to address the father's "12-month failure to pay support," which was blocked by the actions addressed in this appeal, be rescheduled immediately.
6. Sanctions, and an investigation into the gross misconduct and criminal actions of the opposing counsel, Matt Dodd and Dillon Post, Prosecutor Schultze, Judge Breuner, and the father, Richard DuCharme (theft of mother's property and pets, false reports to law enforcement, custodial interference, perjury, tax fraud, stalking, conspiracy & vexatious litigation).

Dated this Day of August 14th, 2024


Jennifer Brick
Appellant

A copy was served the Appellee via electronic service to the Dodd Law Firm on August 14th, 2024.

Dated this Day of August 14th, 2024

A handwritten signature in blue ink, appearing to read "Jennifer Brick", is written over a horizontal line.

Jennifer Brick
Appellant