24-6877

**IN THE**
**SUPREME COURT OF THE UNITED STATES**

AMANDA MEHLBAUM – Petitioner

vs.

PEOPLE OF THE STATE OF ILLINOIS – Respondent



ON PETITION FOR WRIT OF CERTIORARI TO
THE ILLINOIS SUPREME COURT

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# PETITION FOR WRIT OF CERTIORARI

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815-319-5748

## I. QUESTION PRESENTED

Can a state terminate a parent's constitutional right to raise her child based solely on hearsay evidence, where the state's burden of proof at a fitness hearing to to prove unfitness by clear and convincing evidence pursuant to Santosky v. Kramer.

## LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

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## PETITION FOR WRIT OF CERTIORARI

Amanda M. respectfully petitions this court for a writ of certiorari to review the judgment of the Illinois Appellate Court – Fourth District.

## OPINIONS BELOW

The decision by Illinois Fourth District Appellate Court is unpulished. That opinions is attached as Appendix 1. The Illinois Supreme Court denied petitioner's Petition for Leave to Appeal on December 20, 2024. That order is unpublished. The order is attached as Appendix 2.

## JURISDICTION

Amanda's petition for leave to Appeal was denied on December 20, 2024. She invokes this Court's jurisdiction under 28 U.S.C. § 1257, having timely filed this petition for a writ of certiorari within ninety days of the Illinois Supreme Court's judgment

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

United States Constitution, Amendment 14, Section 1

> All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Illinois Juvenile Court Act, 705 ILCS 405/2-18(4)(b)

> (4) (a) Any writing, record, photograph or x-ray of any hospital or public or private agency, whether in the form of an entry in a book or otherwise, made as a memorandum or record of any condition, act, transaction, occurrence or event relating to a minor in an abuse, neglect or dependency proceeding, shall be admissible in evidence as proof of that condition, act, transaction, occurrence or event, if the court finds that the document was made in the regular course of the business of the hospital or agency at the time of the act, transaction, occurrence or event, or within a reasonable time thereafter. A certification by the head or responsible employee or agent of the hospital or agency having knowledge of the creation and maintenance of or of the matters stated in the writing, record, photograph or x-ray attesting that the document is the full and complete record of the condition, act, transaction, occurrence or event and that it satisfies the conditions of this paragraph shall be prima facie evidence of the facts contained in such certification. All other circumstances of the making of the memorandum, record,

photograph or x-ray, including lack of personal knowledge of the maker, may be proved to affect the weight to be accorded such evidence, but shall not affect its admissibility.

Illinois Supreme Court Rule 236

**(a)** Any writing or record, whether in the form of any entry in a book or otherwise, made as a memorandum or record of any act, transaction, occurrence, or event, shall be admissible as evidence of the act, transaction, occurrence, or event, if made in the regular course of any business, and if it was the regular course of the business to make such a memorandum or record at the time of such an act, transaction, occurrence, or event or within a reasonable time thereafter. All other circumstances of the making of the writing or record, including lack of personal knowledge by the entrant or maker, may be shown to affect its weight, but shall not affect its admissibility. The term "business," as used in this rule, includes business, profession, occupation, and calling of every kind.

Illinois Supreme Court Rule 805

Hearsay included within hearsay is not excluded under the hearsay rule if each part of the combined statements conforms with an exception to the hearsay rule provided in these rules.

## STATEMENT OF THE CASE

Respondent/Mother, Amanda M. is the biological mother of M.M., born 8/15/2017. This case commenced when the state filed a Neglect Petition for M.M on March 25, 2022. The petition set forth a single count alleging that M.M. was neglected because she was in an injurious environment in that Amanda had mental health issues which prevented her from properly parenting, pursuant to 705 ILCS 405/2-3(1)(b). The trial court held an adjudicatory hearing on July 15, 2022. The State called no witnesses. Amanda stipulated to the single count of the Neglect Petition. The court found M.M. neglected based on the statement of facts filed with the court.

The trial court held a dispositional hearing on January 11, 2023. At that hearing, Amanda stipulated that she was "either unfit or unable but not unwilling at this time" to care for M.M.. The court granted guardianship and custody of M.M. to DCFS. The court also held a first permanency review instanter, but made no findings as to Amanda's efforts.

The court held another permanency review on May 4, 2023. No testimony was taken. The caseworker addressed the court without being sworn. The court held a third permanency review

on October 4, 2023. (R 121) Again no witnesses testified. The State asked the court to take judicial notice of reports filed by DCFS on 9/21/23 and 9/27.23, and the service plan filed with the court. No witnesses testified. On October 20, 2023, the court found that Amanda had not made reasonable efforts or progress during the review period. The court changed the goal to termination of parental rights.

The State filed a Motion to Terminate Parental Rights on October 23, 2023. The motion consisted of 4 counts alleging that Amanda was unfit. Count 1 alleged failure to make reasonable efforts during the period from January 20, 2023 through October 20, 2023; Count 2 alleged failure to make reasonable progress during the period from January 20, 2023 through October 20, 2023; Count 3 alleged failure to maintain a reasonable degree of interest, concern or responsibility; and Count 4 alleged Amanda failed to protect M.M. from an injurious environment.

The court began the hearing on fitness on January 1, 2024. The State began by asking the court to take judicial notice of the neglect petition filed on 3-25-22, the emergency temporary custody order filed on 3-28-22, the temporary custody order filed 4-6-22, the adjudication order filed 7-15-22, the disposition order filed 1-11-23, the permanency review order filed 5-4-23, and the permanency review order filed 10-20-23. The court took notice without objection. (R 186) The State then offered People's Exhibit 5, the indicated report in this case. (R 186) It was admitted without objection.

The State then called case worker Bethany Dunaj as its only witness. Dunaj testified that she had been a DCFS child welfare specialist since 2020. She testified that she was assigned to this case in January, 2023. She then identified People's Exhibits 2, 3 and 4 as service plans dated 4/1/22, 9/20/23 and 3/9/23 respectively. The plans were admitted without objection. She then testified that the most recent service plan requested Amanda to engage in visitation, cooperation, a mental health assessment, a substance abuse assessment, medical services and habilitation services.

Dunaj then testified that Amanda was consistent in communication with the agency. She testified that "Amanda engaged in counseling at Hope Counseling from March to September, 2023."

Dunaj testified regarding the counselor's statement regarding Amanda being discharged from counseling. Amanda objected to Dunaj testifying as to the counselor's statements as hearsay. The court overruled her objection on the grounds that the testimony was "not offered for the truth of the matter, but to explain how the agency proceeded." Dunaj then testified that Amanda was put on a wait list for counseling at Rosecrance, but was never taken off the list. She then testified that Amanda did a mental health assessment. Dunaj then testified that Amanda had an "encounter" with the Rockford Police Department involving Amanda and domestic violence, but did not testify as to any of the details of that encounter. (R 200) Next she testified that Amanda started domestic violence services in September, 2023. (R 201) She testified that Amanda engaged in domestic violence services at Remedies, but did not know if she completed them. She testified that she had "concerns" about Amanda taking her medications.

Dunaj testified that Amanda consistently testified positive for THC during the case. Amanda then objected to Dunaj testifying about the results of drug drops. The court overruled he objection without explanation. Dunaj then testified that Amanda did a substance abuse assessment. She also testified that Amanda was recommended to engage in Project SAFE at Rosecrance, but that she did not successfully complete that. (R 205) She testified that Amanda was discharged due to lack of attendance. She then testified that the agency did not refer Amanda to parenting classes "because of sobriety." Dunaj then testified that Hobby Horse (a visitation supervision agency) reported "bizarre behavior" by Amanda during some visits, reported observing Amanda taking medication in front of M.M., and one time reported thinking Amanda "might" be "under the influence." She then testified that visits were at one point suspended due to "concerns" about M.M.'s behavior after visits. She testified:

> ...when [M.M.] would return from a visit, initially there would be a couple days span of behaviors that were not normal for [M.M.] just more out of control, more tantrums, things of that nature following the visits. That did reduce a little bit as

> she had gotten a little bit further in her counseling where she had more coping skills and had more verbal communication, but she was still having some pretty major breakdowns for like a 24-hour period following the visits which did include night terrors.

Dunaj testified that Amanda visited regularly when allowed. She also testified that Amanda saw a primary care doctor and a psychiatrist regarding her medications. She testified that Amanda's psychiatrist had no concerns about her compliance with medications.

On cross examination by Amanda, Dunaj testified that the visitation supervisors at Hobby Horse were trained in parenting coaching. She testified that she did not remember whether Amanda was tested after the visitation when it was alleged she might be under the influence. She then identified Amanda's Exhibit 1 as a letter from Remedies. She testified that she remembered the document, and that it reflected that Amanda had been involved in both individual and group counseling at Remedies from 12/22 through 5/23. She also testified that Amanda was seeing her psychiatrist regarding her medications "consistently."

She then testified that some of Amanda's medications were prescribed on an "as needed" basis. She also testified that Amanda's psychiatrist said in July, 2023 that Amanda was taking her medications as prescribed. She testified that Amanda was discharged from Rosecrance in November, 2023. Dunaj then testified that Amanda had obtained a medical marijuana card, but she did not identify the date. The State then offered People's Exhibit 7, a service plan dated 9/12/23. The exhibit was admitted without objection. On cross examination by the GAL, Dunaj testified that the behaviors Hobby Horse reported at the visitation at which they believed Amanda might be under the influence included Amanda being "shaky', being hard to understand, and asking the same question repeatedly. She also testified that M.M. was reporting fear of returning home, and fear of Amanda in general.

On March 19, 2024, the court continued the fitness hearing. There was no further evidence offered, but the court heard the arguments of counsel. On May 2, 2024, the court announced its

decision finding that the State had met its burden of proof on all 4 counts in the Motion to Terminate Parental Rights.

After a hearing on best interests, the court found that it was in the best interests of M.M. that Amanda's parental rights be terminated, and entered an order terminating those rights. Amanda timely appealed on May 14, 2024. Her appeal was denied by the Illinois Appellate Court, 4th District, on October 11, 2024. Her Petition for Leave to Appeal was denied by the Illinois Supreme Court on December 20, 2024.

Amanda first raised her claim of a due process violation in the appellate court, and asked the court to review her claim under the plain error doctrine. While denying there was any error, the appellate court did address her constitutional claim.

## REASONS FOR GRANTING THE WRIT

### THE COURTS DENIED AMANDA DUE PROCESS AT THE FITNESS HEARING BY RELYING EXCLUSIVELY ON MULTI-LEVEL HEARSAY TO PROVE AMANDA'S UNFITNESS ON ALL COUNTS

Amanda was denied due process at the fitness hearing because the trial court's findings of unfitness on the 4 counts in the motion to terminate parental rights all relied solely on hearsay evidence. Because the court's rulings were based solely on such hearsay evidence, the findings of unfitness and termination of her parental rights were a denial of due process because hearsay alone cannot meet the burden of clear and convincing evidence in a termination hearing.

The court denied Amanda due process at the fitness hearing by allowing the State to meet its burden of proof based exclusively on multi-level hearsay in the State's exhibits. Because the termination of parental rights is an extraordinarily serious matter, the State must prove unfitness by clear and convincing evidence. *Santosky v, Kramer*, 455 US 745, 747 (1982); *In re S.J.*, 233 Ill.App.3d 88, 113 (2d Dist. 1992) Hearsay evidence alone should therefore never be sufficient to meet the State's

burden when that burden is proof by clear and convincing evidence. *U.S. v. Hazzard*, 598 F.Supp. 1442 (N.D.Ill 1984)(hearsay alone will rarely, if ever, satisfy the clear and convincing standard); *In re A.J*, 296 Ill. App. 3d 903, 917 (Ill. App. Ct. 1998). In *Williams v. People of the V.I.*, 53 V.I. 514, 527 (2010), the court surveyed the issue in numerous jurisdictions and found that:

> ...other courts have indicated that the clear and convincing standard will not ordinarily be met by hearsay evidence alone. See, e.g., *Lynch v. United States*, 557 A.2d 580, 582 n.6 (D.C. 1989)("A trial judge may, of course, consider the hearsay character of the government's evidence in determining whether a clear and convincing showing has been made. The trial judge may, and in appropriate cases we are confident will, require that the hearsay evidence be buttressed by otherwise admissible evidence to meet the clear and convincing standard."); *Fisher*, 618 F. Supp. at 537-38 (clear and convincing standard not met because government offered only hearsay testimony, including triple hearsay, regarding an informant's statements and chose not to present the existing tape or transcript of the conversation); *United State v. Baldinger*, No. 3:85-00031, 1985 U.S. Dist. LEXIS 20029, at *19 n.9 (M.D. Tenn. May 8, 1985)("While the rules of evidence do not apply at [detention] hearings, the use of exclusively hearsay testimony to support an extended detention without valid justification, particularly if the testimony is removed twice or thrice from its original source, runs a serious risk of failing to meet the high evidentiary standard of clear and convincing proof ... ." (internal citation omitted)); *United States v. Hazzard*, 598 F. Supp. 1442, 1453 (N.D. Ill. 1984) ("It may well be that hearsay alone will rarely, if ever, satisfy the clear and convincing standard.").

See also *In re T.M.*, 2023-Ohio-2804, 222 N.E.3d 1271, 1277 (Ct. App.); *In the Interest of R.I.D.*, 543 S.W.3d 422, 428 (Tex. App. 2018); *Muller v. N.Y. State Div. of Hous. & Cmty. Renewal*, 263 A.D.2d 296,308 (App. Div. 1st Dept. 2000); *United States v. Bertoli,* 40 F.3d 1384, 1409 (3d Cir. 1994)(hearsay may only be admitted in such cases when the court examines the "totality of the circumstances, including other corroborating evidence....")

Similarly, in the context of administrative proceedings, courts can set aside agency findings only where they are not supported by "substantial evidence." *Fla. Med. Ctr. of Clearwater, Inc. v. Sebelius*, 614 F.3d 1276, 1280 (11th Cir. 2010) In reviewing such decisions, the court considers "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." *Fla. Med. Ctr.*, 614 F.3d at 1280. Administrative findings, to be based on "substantial evidence", "cannot be based

upon hearsay alone, nor upon hearsay corroborated by a mere scintilla." *Boyle's Famous Corned Beef Co.* v. NLRB, 400 F.2d 154, 170 (8th Cir. 1968) "Substantial evidence" is defined as "such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." *Am. Textile Mfrs. Inst. v. Donovan*, 452 U.S. 490, 523.(1981) "Substantial evidence is more than a scintilla, but less than a preponderance, of the evidence. *Beck v Shinseki*,2015 U.S. Dist. LEXIS 32053, ¶ 43. In *Consolidated Edison Co. v. NLRB*, 305 U.S. 19 (1938), the U.S. Supreme Court held that where "remote hearsay and mere rumor" dominated the testimony, that procedure was "repugnant to due process." Consolidated Edison, at ¶ 24

So even where the burden of proof is "less than a preponderance of the evidence", the use of mere hearsay to meet the burden of proof is "repugnant to due process." And this is in the context of review of administrative decision. Such decisions may impact important public policy issues, but they do not involve the government taking away a fundamental constitutional right. Where, as here, the State seeks to deprive a parent of her constitutionally protected parental rights, and the State's burden of proof is clear and convincing evidence, the use of only hearsay evidence to meet that burden is similarly

repugnant to due process.

In *In re A.J.*, 296 Ill. App. 3d 903 (2d Dist. 1998) the Illinois appellate court correctly ruled that hearsay was not admissible to prove unfitness. *A.J.*, at 915 Since *A.J.* was decided, Illinois adopted the current version of 750 ILCS 405/2-18(4)(b), which makes DCFS reports admissible as business records. The Fourth District Appellate Court in the present case (and others), and the Second District Appellate Court, have both rejected Amanda's argument here. See eg. *In re*. J.J., 2022 IL App (4th) 220131-U, ¶ 34; *In re* Z.J., 2020 IL App (2d) 190824, ¶ 66 In both cases, as here, the courts decided that section 2-18(4)(b) should be read to allow the court to consider all hearsay within a report admitted pursuant to that section, regardless of the levels of hearsay or the source. In re J.J., supra, at ¶ 34; *In re*

*Z.J., supra*, at ¶ 67. The courts all agreed that such hearsay is admissible in part because the statute allows the court to determine the weight to be given such evidence including "[a]ll other circumstances of the making of the memorandum, record, photograph or x-ray, including lack of personal knowledge of the maker." In re J.J., supra, at ¶ 34; In re Z.J., supra, at ¶ 54

Amanda argues that those decisions were incorrect in that they were based on erroneous interpretations of the statute and, more importantly, if that interpretation is accurate, then section 2-18(4)(b) violates due process to the extent it allows the court to make a finding of unfitness based on hearsay evidence *alone*. While is is arguable whether the Illinois Legislature intended to make every statement in DCFS reports admissible (which Amanda denies), no state can, by legislation, alter the constitutional requirement regarding the burden of proof. *Santosky Kramer,* 455 U.S. 745, 747 (1982).

The language in section 2-18(4)(b) that the appellate court's claims makes all hearsay admissible, is identical to language in Illinois Supreme Court Rule 236, the Illinois business records exception to the hearsay rule, which similarly provides:

> All other circumstances of the making of the writing or record, including lack of personal knowledge by the entrant or maker, may be shown to affect its weight, but shall not affect its admissibility. Ill.S.Ct.R. 236(a)

Yet in *Holland v. Schwan's Home Serv., Inc.*, 2013 IL App (5th) 110560, the Illinois appellate court held that hearsay within such business records must each meet an independent exception to the hearsay rule, as provided in Illinois Rule of Evidence 805.

In this case. the State's only exhibits here were the integrated assessment, 4 service plans and an indicated packet. (People's Exhibits 1, 2, 3, 4 and 7) Those reports were offered into evidence without objection because there was no dispute that they were business records under section 405/2-18(4)(b). However, Amanda disagrees that admissibility of a document under that section means that everything within those reports is admissible, let alone sufficient to meet the State's burden of proof by clear and convincing evidence. But even if section 2-18(4)(b) makes all the multi-level hearsay

statements in those reports admissible, it does not change the fact that they are still hearsay. And the overwhelming consensus of the cases indicates that hearsay evidence alone, without corroboration, is not sufficient to meet the standard of clear and convincing evidence. That principle holds true in state and federal courts, and in civil, criminal and administrastive cases. Allowing the purported statements of non-DCFS third parties, often unidentified, unsworn and not subject to cross examination, as the sole basis for a finding of unfitness denies a parent due process.

Due process requires, at a minimum, a fair trial before a fair tribunal. *Caperton v. A. T. Massey Coal Co.*, 556 U.S. 868, 876 (2009) Under the currently accepted reading of the statute, the state and court can rely on statements from unidentified persons regarding the conduct, or lack thereof, of the parent. A neighbor can tell a relative, who can tell a caseworker, who can include in a report, a statement that the parent engaged in domestic violence. As currently interpreted, section 2-18(4)(b) would allow such "evidence" alone to justify termination of a parent's constitutional rights.
As the court said in *A.J.:*

> This case demonstrates clearly why hearsay is inadmissible. The source of the information regarding respondent's drug tests is unknown. We do not know whether Cummings received reports directly from the laboratory conducting the tests or merely heard from someone else — perhaps someone with a motive to lie — that respondent had failed a drug test. No information is available about the procedures used in testing, the substances involved, or the amounts in question. Respondent was unable to cross-examine witnesses about the testing procedures *A.J.,* supra, at 917.

When the State is seeking to terminate an important constitutional right, such unsworn evidence, from often anonymous reporters, never subjected to cross examination, should never be enough to meet the standard of clear and convincing evidence. *U.S. v. Hazzard, supra*, at 1453; *Consolidated Edison*, supra at ¶ 24.

Where section 2-18(4)(b) is interpreted to allow the rankest, multi-level hearsay from unnamed, unsworn and un-cross-examined persons, the statute is, as interpreted, repugnant to due process where

that type of evidence alone is deemed sufficient to constitute clear and convincing evidence. The language in section 405/2-18(4)(b) regarding the weight to be given to hearsay entries in DCFS reports is irrelevant to whether reliance on such evidence alone is unconstitutional.

The more limited reading of section 405/2-18(4)(b) proposed by Amanda is not just constitutionally required, but is consistent with Illinois Rule of Evidence 805 and case law on evidence in similar circumstances. Rule 805 provides that "hearsay within hearsay is not excluded under the hearsay rule if each part of the combined statements conforms with an exception to the hearsay rule provided in these rules." Ill.R.Evid. 805 Similarly, in *People v. McCullough*, the appellate court noted that multiple hearsay is not admissible unless each layer of hearsay is excused by its own exception. *People v. McCullough,* 2015 WL 63042 (2d 2015), ¶113; see also *In re J.G.*, 298 Ill.App.3d 617 (4th Dist. 1968)

In cases like this, numerous reports are filed with the court that contain massive amounts of multi-level hearsay, which is why courts have previously ruled that wholesale admission of such records pursuant to judicial notice must not be allowed. *In re v. J.P.*, 316 Ill. App. 3d 652, 663 (2d Dist. 2000) It is why the Illinois appellate courts in *In re Zariyah A.*, 2017 IL App (1st) 170971, *In re K.S*, 343 Ill. App. 3d 177 (2d Dist. 2003), and *In re G.V.*, 2018 IL App (3d) 180272 rejected the admission of multilevel hearsay in DCFS reports without proper hearsay exceptions for each hearsay statement therein.

Here, the State's only evidence was the hearsay testimony of the caseworker, the indicated report and the 3 service plans. (The integrated assessment was only relevant to establish the services requested of Amanda, not her subsequent efforts or progress.) The sum total of the testimony of the State's sole witness at trial was to lay the foundation for the State's exhibits, and her recounting of the findings in those service plans as to Amanda's completion of services or lack thereof. She did not

testify to being present at, or otherwise having personal knowledge of, Amanda's drug drops, individual counseling, domestic violence or parenting classes.

Determining whether the procedure set forth in section 2-18(4)(b) here comports with the dictates of due process requires consideration of three factors: "[f]irst, the private interest that will be affected by the official action; second, the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and finally, the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976) Here, the procedure of allowing the use of multi-level hearsay denies a parent the right to cross examine witnesses under oath, or often even know their identities, which leads to depriving the private interest of the parent's constitutional right to raise his child, a fundamental constitutional right.

The risk of an erroneous deprivation of a parent's rights through the procedure was clearly set forth by the court in *A.J.* It deprives the parent of the right to confront and cross examine witnesses to expose errors, omissions, or exaggerations in their reports. It cannot be doubted that such a procedure would be found to be unconstitutional in the context of even a misdemeanor prosecution for a traffic violation. Nor can the State claim the parent should subpoena the various providers and other often anonymous reporters, because it is the State's burden to prove unfitness at trial. *In re S.J.*, 233 Ill.App.3d 88, 113 (2d Dist. 1992) The State should not be allowed to shift the burden of obtaining evidence to the parent.

The government's interest in allowing the admission of multitudes of multi-level hearsay, particularly where that evidence alone is used to meet the State's burden of proof, is not even legitimate, let alone determinative. The only "benefit" to the State in this procedure is that the State can avoid the "inconvenience" of actually calling witnesses with personal knowledge to prove its case. The

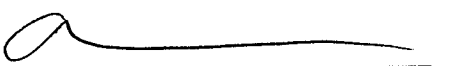
State must meet its burden of proof on fitness based on admissible evidence admitted at trial that rises to the level of clear and convincing evidence. While requiring the State to hold an actual trial might be seen by the State as an "inconvenience", it is required by due process as outlined above.

The trial and appellate courts in this case thus erred in using multi-level hearsay in the DCFS service plans alone, in People's Exhibits 2 through 5 and 7, as the sole basis for its finding of unfitness. Because the State relied exclusively on that multi-level hearsay in the State's exhibits to meet its burden of proof with respect to all 4 counts, it denied Amanda due process. *Consolidated Edison Co. v. NLRB,* 305 U.S. 19 (1938) The findings of unfitness and the termination of Amanda's parental rights should therefore be reversed.

## CONCLUSION

Amanda requests that her Petition for Writ of Certiorari be granted,

Respectfully submitted,



Amanda Mehlbaum

# APPENDIX A