

County of Santa Clara

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(ENDORSED)
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MAR 21 2023
Clerk of the Court
Superior Court of CA County of Santa Clara
BY Bimmy Buckley DEPUTY



Tiffany Lennear
Clerk of the Board

March 16, 2023

Santa Clara County Superior Court
c/o: Honorable Beth McGowen, Presiding Judge
191 North First Street
San Jose, CA 95113

RE: Grand Jury Report - Conservatorships-A Case for Zealous Advocacy

Dear Honorable Judge McGowen,

At its regularly scheduled meeting held March 14, 2023 (Item No. 67), the County of Santa Clara Board of Supervisors adopted a response from Administration to Final Civil Grand Jury Report relating to Conservatorships: A Case for Zealous Advocacy.

Enclosed is a copy of the response for your records.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tina Purpura", is written over the typed name and title.

Tina Purpura
Deputy Clerk

Enclosures

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Molly O'Neal
Public Defender

February 28, 2023

Greta S. Hansen, J.D.
Chief Operating Officer
Santa Clara County
Office of the County Executive
70 West Hedding Street
11th Floor
San Jose, CA 95110
Sent via email: Greta.Hansen@ceo.sccgov.org

Re: December 20, 2022 Civil Grand Jury Report, "Conservatorships: A Case for Zealous Advocacy";
Response of the Office of the Public Defender per Penal Code section 955.03

Dear Ms. Hansen:

This letter serves as the Public Defender's written response to the findings and recommendations of the Civil Grand Jury's report entitled "Conservatorships: A Case for Zealous Advocacy."

I. Introduction

The Public Defender's Office (PDO) received the Santa Clara County Civil Grand Jury (CGJ) report entitled "Conservatorships: A Case for Zealous Advocacy." We carefully reviewed the report and its recommendations and welcomed the opportunity to evaluate our probate conservatorship practice considering recent legislative changes and the emerging standard of care within the community of probate attorneys. We value the time and attention the CGJ devoted to this important area of practice and appreciate their recognition of our commitment to these clients, particularly that of our current probate attorney, Brandon Camarillo. (See CGJ Finding 9) The PDO has long understood the importance of robust probate advocacy as evidenced by the *Thorpe v. Reed* litigation. Deputy public defender Mark Dames and his client Danny Reed were featured in an investigative journalism series exposing excessive fees charged by some private conservators. (See Exhibit A, Mercury News article, "Santa Clara judge reconsiders his early ruling on trustee excessive fees case;" and Exhibit B, *Thorpe v. Reed* (2012) 211 Cal.App.4th 1381.) The PDO embraces this review process as an opportunity to improve our conservatorship practice and our delivery of service to vulnerable clients. To that end, the PDO convened a working group to:

Chief Assistant Public Defender: Jose G. Guzman
Assistant Public Defenders: Damon Silver, Charlie Hendrickson, Sarah McCarthy

Adopted: 03/14/2023

- (1) Consider the CGJ report and its findings and recommendations,
- (2) Conduct a separate evaluation of our probate practice,
- (3) Evaluate the work currently being done by other organizations in this field, particularly the Guardianship Advocacy Project (GAP) in Clark County, Nevada, and
- (4) Implement the recommendations of the CGJ.

Pursuant to Penal Code section 955.03, we address each finding and recommendation from the CGJ.

II. The Nevada Model or GAP

On February 15 and 16, 2023, five members of our probate working group travelled to Clark County, Nevada and met with representatives from GAP. Our interdisciplinary team included Brandon Camarillo (PDO probate attorney), Mairead O’Keefe (Mental Health Supervisor), Adam Perez (Program Manager/Business Analyst), Rachel Benitez (PDO social worker), and Charlie Hendrickson (Assistant Public Defender). During our visit, we discussed the genesis of the GAP program, received an overview of GAP’s practice, learned about GAP’s day-to-day operations, and considered how we may best incorporate relevant aspects of their practice into our own.

Each working group member made detailed notes during the trip within their unique area of expertise. Our team will meet as needed to discuss GAP processes and their incorporation into our practice.

A. GAP Background and Creation

GAP was created in response to large-scale financial abuses committed by private guardians in Las Vegas, Nevada. The details of their crimes were featured in a New Yorker magazine article entitled, “How the Elderly Lose Their Rights, Guardians can sell the assets and control the lives of senior citizens without their consent—and reap a profit from it,” (The New Yorker (10/09/2017), Reporter at Large, Rachel Aviv.) Nevada prosecutors obtained criminal indictments against private guardian (April Parks), her business partner (Mark Simmons), husband (Gary Taylor) and a local attorney (Noel Simpson.) Ms. Parks was sentenced to 16 to 40 years in state prison. The others also received custodial terms.

In response to systemic failure, the Supreme Court of Nevada created a commission to study guardianships in the state and propose reforms. Most importantly, the proposed conservatee or “protected person” (terminology now used in Nevada) did not previously have the right to legal representation.¹ That was remedied by statute. As part of the commission reforms, the Legal Aid

¹ The terminology employed by our two jurisdictions is different. Nevada uses the term “guardianship” whereas California uses the term “conservatorship.” In Nevada, a person subject to a guardianship is a “protected person.” In California, the same person is a “proposed conservatee.”

Center of Southern Nevada (LACSN) assumed representation for protected persons in Clark County. LACSN is a non-profit organization that provides pro bono representation in a broad range of areas including consumer rights, children's rights, family justice and senior's rights. LACSN was tasked with creating the Guardianship Advocacy Project to protect the rights of persons potentially subject to guardianships in Clark County. GAP is funded through a recorder's fee collected for newly filed deeds in Clark County in addition to grants and private sources.

GAP began accepting appointments to represent "protected persons" on January 1, 2018. GAP's client base now spans five years of appointments. GAP estimates there are 750 to 1000 guardianship cases that pre-date 2018 with no GAP appointment and no current representation, something GAP seeks to address.

It should be noted that in Nevada, persons potentially subject to guardianships are limited to a court trial to challenge the imposition of the guardianship. Protected persons do not have the right to a jury trial. In California, proposed conservatees (protected persons) have the right to a court trial or jury trial.

B. The GAP Model

The GAP team consists of fourteen attorneys representing adults and five attorneys representing minors. In addition, GAP employs four to five "assistants," and three to five "advocates."

Assistants are akin to legal clerks. They open files, initiate requests for records and update the attorneys' calendars.

Advocates conduct follow-up client check-ins. They meet with all post-adjudication clients every six months. Attorneys update the case management system with information advocates need including diagnosis, name of guardian, and any characteristics unique to the client. Advocates do not complete record reviews; instead, during client visits they are trained to note guardian deficiencies and assess placement, quality of life, medical and clothing needs among other things. Advocates are not social workers and do not provide case management services or resource coordination for the protected person.² GAP considers case management services and resource coordination functions uniquely within the purview of the guardian, not attorneys or other GAP team members representing the protected person.

GAP created a comprehensive checklist for their advocates to complete during home visits but ultimately felt it was too cumbersome. GAP reduced the checklist to a few critical categories plus the requirement of a brief narrative describing the visit. Advocates are instructed to highlight anything they observe that needs immediate attorney attention or action. For example, advocates would note whether the protected person has become non-communicative since the last visit and whether the guardian gave notice of the change. Our social worker, Rachel Benitez, met one-on-one with Anna, GAP's most senior advocate, and learned advocate visits are generally fifteen to twenty minutes in length.

² With respect to the practice of social workers, "case management" is a term of art that encompasses managing the needs and coordination of services for clients.

GAP attorneys work in teams of four, each with a dedicated team lead. The teams meet regularly to staff cases and discuss general issues arising within their guardianship cases. GAP team leads periodically review a percentage of their team members' cases.

C. The Nevada Guardianship Statute and Composition of GAP Caseloads

Unlike California, the Nevada guardianship statute does not differentiate between guardianships based on mental health, intellectual disability, or age-related cognitive disorder (“elder”.) In Nevada, each one of those groups can have a guardianship imposed that is a lifetime appointment. There is no sunset provision built into any Nevada guardianship. By contrast, California sunsets mental health conservatorships at one year. In Nevada, the only way to terminate or modify any guardianship is by filing a subsequent petition to terminate.

GAP attorneys accept representation across all three categories— mental health, intellectual disability, and elder. Their caseloads range from 160 to 190 open cases and consist of pre-adjudication and post-adjudication cases. When asked, GAP indicated it was unable to separate its cases into discrete categories of mental health, intellectual disability, and elder. GAP is unable to assess what percentage of their cases consist of mental health guardianships. As described below, such data is necessary to draw meaningful outcome comparisons between GAP’s *guardianship* practice and the PDO’s *probate* practice.

D. Comparing GAP and Santa Clara County *Probate* Outcomes

As acknowledged by the CGJ on page 19 of its report, it may be impossible to accurately compare GAP outcomes with PDO outcomes because the available data sets do not match. In his August 9, 2022 letter responding to questions posed by the CGJ, deputy public defender Brandon Camarillo explained that California has two kinds of conservatorships, Probate and Lanterman Petris Short (LPS) conservatorships. (See Exhibit C, August 9, 2022 Camarillo letter.) Probate conservatorships are found in the Probate Code and include “general” and “limited” conservatorships of the person and/or estate for persons “who [are] unable to provide properly for [their] personal needs for physical health, food, clothing, or shelter...” Limited conservatorships are created for “developmentally disabled adults,” often clients of the San Andreas Regional Center. Probate conservatorships are distinct from LPS conservatorships which are found in the Welfare and Institutions Code. LPS conservatorships are reserved for persons with mental illness where that condition interferes with their ability to provide for their basic personal needs.

In California, the life cycle of LPS (mental health) conservatorships is shorter than that of probate conservatorships. LPS conservatorships terminate by operation of time and must be petitioned for renewal if they are to be extended. Moreover, because clients under mental health conservatorships often improve with treatment and medication, a much greater number of mental health conservatorships terminate at an earlier time. By contrast, probate conservatorships do not terminate by operation of time. Probate clients often suffer conditions like dementia that are static or worsen over time, so it is far less common for probate conservatorships to terminate.

At the PDO, Mr. Camarillo handles *probate* conservatorships while two other deputy public

defenders handle *LPS* matters. If it were possible for GAP to separate out their mental health conservatorships, then we could compare GAP and PDO *probate* outcomes. As mentioned above, GAP is unable to provide that data.

III. CGJ's Findings, Recommendations Numbers 1-9 and PDO Responses

Finding 1

The PDO found it difficult to compile conservatorship data that was requested by the Civil Grand Jury because of the limited tracking of outcomes and other limitations in the case management software used by the PDO. Their system does not track post-adjudication conservatorship cases, which makes it impossible to collect and analyze data, track outcomes, and efficiently monitor the status of older cases.

Recommendation 1a

The PDO should develop a tracking system that is capable of accurate, detailed, and timely data collection. This recommendation should be implemented by March 30, 2023.

PDO Response to Recommendation 1a:

PDO agrees with this recommendation and will work to improve its case management system to track major categories of information such as attorney caseloads, case types, petition types (e.g. appointment of a (limited) conservator, settlement of the account, termination, etc.), petition outcomes, as well as client age demographics. Some of this work has already been done and all the improvements will be completed by summer 2023. PDO also agrees it should begin to track post-adjudication work in its probate cases as suggested, however, we do not currently have capacity to engage our post-adjudication clients. Data tracking for post-adjudication work can only begin after PDO has sufficient staff to engage them. The time for implementing the recommendation for post-adjudication work is therefore dependent on having the staff needed to engage clients and gather their data. (See also PDO Response to Recommendation 3a below.)

Recommendation 1b

The PDO should develop data analytics that establish metrics in conservatorship cases and track data on subjects like conservatorships denied or avoided, proceedings that result in protecting the conservator, and cases that are terminated. This recommendation should be implemented by June 30, 2023.

PDO Response to Recommendation 1b:

PDO partially agrees with this recommendation. As a preliminary matter, it should be noted that tracking outcomes and successes in the probate arena is different than in criminal matters. In criminal, PDO clients always want to avoid convictions, avoid strike offenses, etc. Measuring litigation success relative to those outcomes makes sense. In probate, "success" evaluations relative to outcomes are more nuanced and must be considered case-by-case. For example, the proposed conservatee may want the support and intervention of a conservatorship. It may be agreed by all including the client that the conservatorship is in the client's best interest. When the PDO attorney, with client's full agreement, stipulates to the conservatorship that is counted as an *uncontested petition*. A raw counting of contested versus uncontested petitions without

qualifying context does not offer meaningful insight into advocacy and may, in fact, be misleading. In other cases, the client may welcome the support of the conservatorship but object to the appointment of the proposed conservator. If the deputy public defender successfully negotiates an alternate conservator and communicates his client's consent to the conservatorship, that is a positive outcome resulting from successful advocacy but would be counted as an *uncontested petition*. Again, merely counting the number of uncontested petitions fails to credit the deputy public defender's successful advocacy.

With the above in mind, the PDO will consider ways to track outcomes that measure successful advocacy in circumstances where there is no objection to a conservatorship petition.

The PDO has already begun the evaluation of additional data-tracking categories to establish metrics related to the conservatorship petitions, their results, nuances within those results, as well as the specific outcomes of important related conservatorship hearings such as conservatorship termination, suspension, and accounting hearings. The PDO intends to complete that evaluation and update its case management system with these new categories by the summer of 2023, and PDO will review the need to add or modify all categories approximately six months from the recommended implementation date.

Given the new statute defining our role as a "zealous, independent advocate representing the wishes of the conservatee" and the welcomed recommendation for "proactive case management" (see below), the PDO will have to develop methods for capturing client advocacy efforts that do not involve litigation. This is because some investigations and interviews satisfy the mandate for zealous advocacy without involving an actual court appearance. For example, an attorney may be able to negotiate a change of residence for her conservatee client by investigating her client's situation and simply talking to her client's family and conservator. Given the value such efforts can bring to our clients, the PDO will need to develop workflows and procedures that capture out-of-court efforts and results. Implementation timelines will also be dependent on having the staff needed to develop and implement these new workflows and procedures.

Prior to the CGJ report, the PDO closed conservatorship cases post-adjudication. Given the new legal mandate and the CGJ recommendation, cases will not be closed unless the conservatorship has been terminated or transferred to another jurisdiction. The majority of probate conservatorship petitions result in the establishment of a probate conservatorship, but not all. Therefore, the PDO will need to determine which cases should be reopened.

Finding 2

The PDO indicated that they are the attorney of record for more than 3,000 probate conservatees.

Recommendation 2

The PDO should ascertain which of their conservatorship cases should be terminated due to the conservatee's death. This recommendation should be implemented by June 30, 2023.

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PDO Response to Recommendation 2:

Generally, when a conservatee or limited conservatee dies, termination of the conservatorships and limited conservatorships is automatic pursuant to Probate Code §§ 1860 and 1860.5, and no petition is required for termination. The PDO will conduct an internal audit of its post-adjudication cases to determine which cases should remain closed due to the death of the conservatee or limited conservatee. Completing this review will involve investigative efforts and resources. PDO will exercise best efforts to complete this review by June 30, 2023. Once we begin the review we will have a better sense if that time frame is feasible.

Finding 3

The PDO does not actively monitor post-adjudicated probate conservatorship cases in the County where an estate is not involved.

Recommendation 3a

The PDO should review all probate conservatorship cases where they are the attorney of record to determine what case management and case monitoring responsibilities are owed to these clients based on changes to various California laws that expressly require zealous advocacy and new standards for establishing and maintaining a probate conservatorship. To be implemented by June 30, 2023.

PDO Response to Recommendation 3a:

The PDO agrees we should undertake a review of the 3,000 post-adjudication cases for which PDO remains attorney of record. Sorting cases between living and deceased clients will involve a substantial dedication of resources in addition to the volume of new probate conservatorship cases currently handled by the PDO.

In a few of the 3,000 cases, a petition to terminate or transfer the case will appear in the PDO's case management system. For those matters, the PDO will know that case should remain closed. In other cases, the PDO files will have a conservator-filed document called California Judicial Council Form GC-399 "Notice of Conservatee's Death." Having such a document is clear evidence the file should remain closed. Unfortunately, there will be thousands of cases that lack such notices. It will require significant staff time to locate the present contact information for clients.

Once the PDO understands how many of the 3,000 cases should remain active, we will undertake efforts to re-engage them. The PDO will establish consistent standards for evaluating each client we re-engage. It will require considerable time to visit and evaluate each one. Presently, it is not feasible for our single probate attorney and support staff to re-engage those clients in addition to their current job duties. For that reason, the PDO submitted a FY24 budget request seeking the addition of one full time attorney and social worker to the probate team. If the FY24 budget request is funded and additional staff is hired, the PDO will then commence this process. At that time, the PDO will be able to provide an estimated time frame for completing the review. For example, if there are 2,000 clients we need to meet in-person and, on average, we complete 15 contact visits and evaluations per week, it will require 133 weeks or a little over 2.5 years to complete review of 2,000 clients.

Finally, the outcome of the above review process may lead to additional litigation work for our probate team in the form of petitions to terminate conservatorships, change the conditions of the conservatorship, designate a new conservator, among other things. At that time, the PDO will reassess staffing needs for our probate team.

Recommendation 3b

The PDO should adopt a proactive case management model for all cases for which it is attorney of record. This recommendation should be implemented by June 30, 2023.

PDO Response to Recommendation 3b:

PDO embraces this recommendation for a proactive case management model. The best practice is to visit clients in their homes. PDO will need staff who can visit clients in-person, verbally communicate with clients and observe their overall physical and cognitive condition. (See response to Recommendation 3a above.)

The PDO will establish a practice of regular visits for each client on conservatorship. Such visits will be conducted by a probate team member who will follow consistent evaluation standards.

Given the volume of cases, the PDO has requested FY24 funding for one additional attorney and social worker. Assuming that budget request is granted, the PDO will evaluate the performance of the augmented team at regular intervals and make further assessments of staffing needs. Recent changes in probate law make it harder to maintain a conservatorship. Given that PDO will be proactively educating its clients about the changes, it is likely that additional staff will be needed to adequately represent probate conservatees. PDO will adopt a proactive case management model that includes this review work by June 30, 2023. As explained above, it will be impossible to have completed reviews of the estimated 3,000 clients in that time frame.

Finding 4

The PDO currently has one attorney assigned to handle probate conservatorships. The number of proposed conservatees that will need representation from the PDO is likely to grow because of the mandatory appointment and the gaining population in the County. Under the new legislative guidelines that have recently been enacted (e.g. zealous advocacy, changes to conservatorship standards), it seems infeasible that one attorney can provide sufficient representation for the number of conservatees in the County that will need representation for the PDO.

Recommendation 4a

The PDO should research and determine the ideal caseload per attorney and the staffing needed to accommodate a proactive style of case management that accounts for recent legislative changes. This recommendation should be implemented by June 30, 2023.

Recommendation 4b

The PDO should evaluate its resource needs to best serve the growing needs of conservatees in the County and request appropriate funding from the County. This recommendation should be implemented by June 30, 2023.

PDO Response to Recommendations 4a and 4b:

The PDO has met with representatives from GAP and spent two days on-site observing their practice. The PDO will seek input from similar public defender agencies about their caseloads and best practices. The PDO agrees one probate attorney cannot handle the new practice model we intend to embrace and for that reason submitted a FY24 budget request to add a second full-time attorney and social worker to our probate team.

Finding 5

The current PDO attorney is compliant in the required probate conservatorship training. The Civil Grand Jury's concern is that there is currently just one lawyer in PDO that is handling probate conservatorships. This leaves little opportunity for cross-training and peer-to-peer collaboration. Further, the supervisor of the division is not required to have probate conservatorship expertise.

Recommendation 5

The PDO should cross-train staff specific to conservatorship law and develop written materials to ensure that institutional knowledge is maintained despite attorney turnover. This recommendation should be implemented by June 30, 2023.

PDO Response to Recommendation 5:

The PDO will consult with the local bar, other public defender offices, and former PDO probate staff to develop training and materials that can help institutionalize probate knowledge at the PDO. As of February 21, 2023, the PDO employs as extra help retired deputy public defender Mark Dames to draft a PDO probate policies and procedures manual and develop trainings to onboard new attorneys to the unit. We anticipate completion of his work by June 30, 2023.

Finding 6

A cognitively impaired client may struggle to challenge or complain about the quality of their legal representation. The PDO does not have formal performance standards or probate case reviews, and the direct supervisor is not required to have expertise in probate law.

Recommendation 6a

The PDO should establish detailed performance standards and quality management standards for conservatorship attorneys. These standards should be monitored by a supervisor knowledgeable in conservatorship law and advocacy. This recommendation should be implemented by June 30, 2023.

Recommendation 6b

The PDO should randomly select a percentage of cases for quality review for each attorney annually. New attorneys should submit for review all written pleadings to the supervisor in the first year. This recommendation should be implemented by June 30, 2023.

Recommendation 6c

The PDO should have regular staff meetings for all staff handling probate conservatorships to discuss policies and cases to ensure uniformity in service and goals. This recommendation should be implemented by March 30, 2023.

PDO Response to Recommendations 6a, 6b and 6c:

The PDO will establish performance and quality management standards for conservatorship attorneys. The PDO will standardize our intake and annual follow-up interview questionnaires. The supervising attorney of the probate unit will attend relevant CLE's and be certified to represent those who are subject to conservatorships. Currently there is only one attorney certified to represent probate clients. It will take longer than June 30, 2023 for our unit supervisor to be have completed the recommended training and certification. We anticipate our unit supervisor completing the requisite certification by September 30, 2023.

With respect to 6b, we agree it is best practice for the unit supervisor to review a percentage of the cases for each attorney on the team. We believe a random sampling of cases and pleadings provides sufficient oversight. We do not consider it necessary for the unit supervisor to review *all* written pleadings as recommended. Given that the unit supervisor will not be certified until September 30, 2023, we believe December 31, 2023 is a reasonable time frame for the completion of the initial review.

With respect to 6c, we agree with the principle of holding regular staff meetings for probate conservatorships. Given that the PDO currently has one certified probate attorney, it will be impossible to implement productive staff meetings by March 30, 2023. If our FY24 budget request is approved and the unit supervisor is probate certified by fall of 2023, we suggest that fall 2023 is reasonable time frame to implement regular staff meetings.

Finding 7

The Nevada Model has a standing order with the court to establish access to clients' records. This saves a significant amount of time and resources.

Recommendation 7

The PDO should explore streamlined ways for attorneys to get needed information in preparation for probate conservatorship cases. For example:

- Hospital records
- Doctors' office records
- Bank records
- Family records
- Guardian records
- Regional center records

This recommendation should be implemented by June 30, 2023.

PDO Response to Recommendation 7:

The last standing order was signed in 2003 and PDO agrees a new standing order is needed. The

PDO drafted a proposed standing order that, if granted, would authorize access to the bulleted items detailed in CGJ's seventh recommendation. It should be noted that there is no standing order for appointment of the PDO for (proposed) general conservatees, although there is a template the court uses for general appointment orders and this template permits access to:

[E]state planning documents (including all financial Powers of Attorney and all Powers of Attorney for Health Care and Advance Directives), all banking, investment, and other financial documents and records, and all medical psychiatric records, and any regional center records related to the (proposed) conservatee and/or trust beneficiary.

(Superior Court template, General Appointment Orders.) The PDO's proposed standing order includes the same categories of information as the general order, and its proposed orders for limited and general conservatorships include language authorizing the PDO access to Santa Clara County family court and guardianship records. Of course, the PDO does not control whether or when proposed orders are granted by the Superior Court.

Finding 8

The GAP achieved success by developing a plan that tracked conservatorship-related data, created a training program, and implemented best practices for case management, which were all designed to effectuate client-directed services that embodied the ideal of zealous advocacy.

Recommendation 8

The PDO should consult with a third party to evaluate its current policies and processes for conservatorship defense and develop a strategic plan for best practices. This should include detailed data collection and analysis, caseloads, outcomes, training, staffing, and quality assurance controls. The strategic plan should be re-evaluated regularly. This recommendation should be implemented by June 30, 2023.

PDO Response to Recommendation 8:

The PDO will investigate the best third-party agency or person to evaluate its current policies and processes for conservatorship defense and advise us regarding overall practice improvement. The PDO anticipates implementing this by June 30, 2023.

Finding 9

The Civil Grand Jury found the PDO's staff to be very helpful and committed to improving the performance of conservatee representation. The dedication of the attorney was evident and appreciated.

Recommendation 9

No recommendation.

PDO Comment on Finding 9:

As with every area of practice at the PDO, we take seriously the representation and service we

provide to persons potentially subject to probate conservatorships. The PDO has long considered itself robust and client-centered in its probate advocacy as evidenced by the *Reed* litigation highlighted in the Introduction to this letter. In general, we view our probate clients as a vulnerable population; each deserves great care and sensitivity in the handling of his or her case. We are grateful for the attention the CGJ devoted to this important area of practice, embrace most of its findings and recommendations and appreciate their recognition of our commitment to these clients.

Very truly yours,

Charlie Hendrickson

Charlie Hendrickson
Assistant Public Defender, County of Santa Clara

Enclosures

cc: Jeffrey Smith, M.D., J.D., County Executive, County of Santa Clara
Shawn Whiteman, Program Manager II, Office of the County Executive, County of Santa Clara