



INTERGOVERNMENTAL TRAINING EVENT

Wednesday September 11, 2024

**2024
Intergovernmental
Training
Event**



Intergovernmental Case Law Update

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Amazon Web Services, State and Local Government

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in the room with us right now?”



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Foreign Currency Exchange

Stone v. Henneke, 2024 VT 26, 23-AP-254 (Vt. May 03, 2024).

Stone v. Henneke, 2024 VT 26, 23-AP-254 (Vt. May 03, 2024).

- M & D Married and living in CA with child.
- Separated 2010. Ontario custody and support order \$1,003 CAD in CSUP and \$2,250 CAD in Spousal.
- Order contemplated M would move to VT but did not discuss currency conversion.
- M and child to VT, D to NM.
- In 2013, Ontario stopped CSUP services and mom applied in VT.

Stone v. Henneke, 2024 VT 26, 23-AP-254 (Vt. May 03, 2024).

- VT did not register the order but did begin administratively collecting support and converted dad's order from CAD to USD using the Bank of Canada Exchange rate on 2/23/10 the date of the original Canadian Order - \$953.69 CSUP in USD and \$2,139.39 Spousal in USD.
- From 11/2013 to 4/2017 OCS collected based on that rate and did not adjust the amounts based on fluctuations in the exchange rate. Father never objected.
- In 2020, OCS sought to register the order, term CSUP as child no longer with mother and adjudicate spousal arrears.
- At the arrears hearing, OCS said father owed \$9,811.14 USD in arrears. Father argued it was wrong to stick with the exchange rate on order date as the value of CAD had gone down since then.

Stone v. Henneke, 2024 VT 26, 23-AP-254 (Vt. May 03, 2024).

- Court found that it was permissible to calculate that way, but after considering case law from other jurisdictions determined that OCS should calculate father's arrears for each year using the exchange rate on the first of each year. Directed OCS to submit an updated affidavit using this method.
- Using this method, instead of arrears Father had overpaid by \$11,892.13. Magistrate ordered Mom to repay it at the rate of \$50 per month.
- Everyone appealed; OCS that arrears were right, mom that she shouldn't have to repay it and Dad that should have used exchange rate on each payment date.
- On Appeal, under UIFSA, VT is the responding tribunal, empowered to determine the amount of any arrears and specify a method of payment. UIFSA specifically authorizes the responding tribunal to make a currency conversion when it is asked to enforce or modify an order. OCS did have the authority to administratively begin enforcing and convert the order from CAD to USD when it did.
- Currency conversion by OCS is a practical prerequisite to collection not a modification of the underlying order. The Canadian order was still controlling and the court was authorized to do its own currency conversion when it was asked to enforce the order.

Stone v. Henneke, 2024 VT 26, 23-AP-254 (Vt. May 03, 2024).

- OCS argued that statutory judgment law precluded the court from recalculating it. That is the amount due under the order, which the court had the authority to determine.
- Section 1305 (f) allows the court discretion to adjust the currency conversion to achieve an equitable result in a contested case.
- OCS argued this could create chaos in orders, but the court found the number of cases is small, they could do periodic adjustments on the case and they could register the order sooner.
- It was equitable to review related case law and decide as it did but it is not equitable to order mother to repay the overpayment resulting from the recalculation. Father never objected to OCS collection efforts, never moved to modify the order or formally challenged the conversion method. Instead because mother had custody the overpayment resulting from the change in exchange-rate should have been deemed a gratuity to the child.

Intertational Orders

Cnty. Of Alameda Dep't. of Child Support Servs. v. T.O., A166581 (Cal.
App. Mar 4, 2024).

Cnty. Of Alameda Dep't. of Child Support Servs. v. T.O., A166581 (Cal. App. Mar 4, 2024).

- *Not for Publication
- Mother and father are parents of TO born in March 2017. They were previously married.
- In March, 2018, a trial court in China issued a judgment dissolving their marriage, awarding custody of TO to mom (both living in China) and granting visitation to father. Dad was ordered to pay 2,500 yen (approximately \$347) per month in child support.
- Mother eventually remarried. She, her new spouse and TO lived in MI in 2019 and NJ as of 2021.
- Father owns residential property in Alameda, CA and San Diego, CA. The San Diego property was used as a rental and father moved to NV in January 2021 but moved back to the Alameda home in December 2021.
- Mother reported very little earnings but father contended she worked for OpenText since 2014 making \$10,000 per month until she stopped working there December 2021.

Cnty. Of Alameda Dep't. of Child Support Servs. v. T.O., A166581 (Cal. App. Mar 4, 2024).

- On 11/30/20 the Dep't filed an action against father to establish child support.
- On 4/21/21 father filed an answer. He did not dispute parentage, but he asserted that the trial court lacked SMJ over child support b/c of the existing Chinese support order and he argued no jurisdiction over him b/c he had moved to Nevada.
- Parties were ordered to submit memoranda of points of authorities on the jurisdictional questions.
- The Dep't. alleged that CA does have jurisdiction as D owns a home in Alameda County and was personally served while in Alameda and he consented by making a general appearance and filing an answer to the complaint.

Cnty. Of Alameda Dep't. of Child Support Servs. v. T.O., A166581 (Cal. App. Mar 4, 2024).

- On the Chinese order, the Dep't. argued that CA does have SMJ despite that order. A foreign support order may be recognized by CA if the foreign country: 1. is a reciprocating country, 2. has laws similar to UIFSA and 3. enforces the Hague Convention. China does not meet these criteria.
- The court agreed with the department and issued a support order of \$1,430 per month.
- After a number of related hearings and rulings, father appealed, representing himself.
- On appeal, the court affirmed the ruling agreeing with Alameda County.

Federal Jurisdiction for State Claims

Hall v. Child Support Enf't (CSU), 24-CV-2444 (LTS) (S.D. N.Y. May 28, 2024).

Hall v. Child Support Enf't (CSU), 24-CV-2444 (LTS) (S.D. N.Y. May 28, 2024).

- M proceeds *in forma pauperis* and used a court form that didn't state a basis for jurisdiction, but in response to the question on the form asking which of her federal rights have been violated she stated: "The child support Enforcement taking money from both of my jobs more than 30% and I have two other children and one who is still of school age. I currently (am) being evicted because I can't pay my rent."
- She also alleged the judge is biased against her. She wants the orders vacated and money she paid returned to her and \$10,000 in damages.
- The court construes the complaint as attempting to assert a claim under 42 USC § 1983.
- Plaintiff failed to allege any facts that the judge acted beyond the scope of her responsibilities or jurisdiction.
- Plaintiff failed to allege any facts that a policy, custom or practice violated her constitutional rights.

Hall v. Child Support Enf't (CSU), 24-CV-2444 (LTS) (S.D. N.Y. May 28, 2024).

- Younger Doctrine - She asked the federal court to intervene in state court, she has not alleged any facts showing bad faith, harassment, or irreparable injury that is both serious and immediate.
- Rooker-Feldman Doctrine precludes this court from any authority to review a final state court order or judgment.
- No facts to support a procedural due process claim. The state has procedures for child support garnishment. If state officials failed to comply with the state law, that would constitute a random and unauthorized deprivation of property but it doesn't rise to a due process violation so long as the state provides some post-deprivation remedy. Here there is no evidence that mom sought administrative or judicial review at the state level or that any remedy is inadequate.
- Dismisses entire complaint.

Sovereign Citizens

Wisconsin Oneida Cnty. Child Support Agency v. Logablo, 24-cv-278-wmc
(W.D. Wis. June 10, 2024).

Wisconsin Oneida Cnty. Child Support Agency v. Logablo, 24-cv-278-wmc (W.D. Wis. June 10, 2024).

- D seeks to remove this case from Circuit Court in Oneida County.
- His dispute arises from Oneida County child support efforts to collect \$16,000 in child support from him.
- He contends that federal jurisdiction is proper pursuant to three statutes; the Foreign Sovereign Immunities Act, 28 USC Sec 1604, the Hague Convention; and the diversity jurisdiction statute, 27 USC Sec. 1332.
- He also argues federal jurisdiction is proper because he is an American Citizen, distinguished from a 14th amendment native or naturalized citizen and therefore is not subject to the jurisdiction of congress.

Wisconsin Oneida Cnty. Child Support Agency v. Logablo, 24-cv-278-wmc (W.D. Wis. June 10, 2024).

- Federal courts cannot adjudicate claims concerning the imposition and collection of child support falling within the area of domestic relations which is governed by state law.
- "Finally, D's arguments are akin to those of so-called "sovereign citizens", which have been rejected repeatedly by courts as frivolous and a waste of court resources."
- Regardless of a person's claimed status of descent, be it as a sovereign citizen, secured-party creditor or flesh and blood human being, that person is not beyond the jurisdiction of the courts.

Property Liens

Santa Clara Cnty. Dep't of Child Support Servs. v. Wright et al, H051180
(Cal. App. Jun 10, 2024).

Santa Clara Cnty. Dep't of Child Support Servs. v. Wright et al, H051180 (Cal. App. Jun 10, 2024).

- * Unpublished.
- In 2011, the dept initiated a child support action to establish support for D - Wright's minor child with a woman.
- The Dept obtained a judgment lien against a property that Wright owned in Los Angeles.
- At that time his ex-wife Sarabia did not have an interest in the property.
- A few years later, Wright transferred interest in the property to Sarabia as "joint tenants in common" during their marriage.

Santa Clara Cnty. Dep't of Child Support Servs. v. Wright et al, H051180 (Cal. App. Jun 10, 2024).

- In 2015, Sarabia obtained a default dissolution judgment against Wright, and the LA property was awarded entirely to her as her separate property.
- Almost a decade later, she sought joinder in the CSUP action to request removal of the lien against the property, alleging that she was unaware of the lien until 2022, did not receive notice of the lien and was a bona fide purchaser of the property. The trial court denied her request and she appealed.
- Additionally, a prior child support case already had a lien on the property. The value of both liens was \$49,065 in 2012.

Santa Clara Cnty. Dep't of Child Support Servs. v. Wright et al, H051180 (Cal. App. Jun 10, 2024).

- When Sarabia tried to be joined as a party to the IV-D action, the dept objected for several reasons: she should seek relief in her divorce, she had constructive notice because the recorded notice of support judgment and she wasn't a bona fide purchaser as she paid no consideration. Her joinder request was denied.
- Mandatory Joinder does not apply as she doesn't have custody rights to a minor child subject to the action.
- Discretionary joinder is also not an avenue, her request for relief is not in the child support case also nothing in the record shows that the dept sought to enforce the lien, only that they recorded the lien before she ever had any interest in the property.
- Furthermore, every duly recorded judgment affecting title to or possession of a real property is constructive notice to subsequent purchasers and mortgagers from the date of recordation.

Santa Clara Cnty. Dep't of Child Support Servs. v. Wright et al, H051180 (Cal. App. Jun 10, 2024).

- The interest transferred remained subject to a judgment lien in the amount of the lien at the time of transfer.
- Accordingly, since the lien was attached to the property before Sarabia received any interest in the property, the law infers that she had constructive notice of the lien and received the property subject to the lien.
- She can't be a bona fide purchaser for value since she didn't purchase the property for any value.
- It is law in CA, that a judgment creditor is not entitled to protection as a bona fide purchaser, but rather stands in the shoes of the judgment debtor and obtains only that interest in the property that he actually possesses.

Record on Appeal

Cnty. Of Kern Dep't of Child Support Servs. v. Simons, F086547 (Cal. App.
June 5, 2024).

Cnty. Of Kern Dep't of Child Support Servs. v. Simons, F086547 (Cal. App. June 5, 2024).

- Lower court denied dad's motion to set aside the judgment of paternity and requesting DNA testing.
- Kern County began proceedings against D in 2005. On 9/23/05 a judgment of parental obligations was entered by default.
- In Feb. 2013, a supplemental complaint was filed by DCSS and it was followed by a request to enter default which was granted on May 7, 2014.
- On March 25, 2019, dad filed a request to set aside judgment and order for support for three children. The court denied his request based on statute of limitations.
- In January 2023, dad filed a request to set aside the judgment of paternity and conduct DNA testing and DCSS responded by declaration.
- The trial court held a hearing and appellant was present but the hearing proceeded without a court reporter and the minute order does not indicate that appellant testified. The order after hearing denied D's request and all previous orders were to remain in effect. D appealed.

Cnty. Of Kern Dep't of Child Support Servs. v. Simons, F086547 (Cal. App. June 5, 2024).

- D's sole contention is that DNA testing should be granted because he had never met the child or consented to being the child's father.
- D did not file a complete record so all the appellate court knows is he filed his request and his request was denied.
- Such a ruling rests with the court's discretion and leaves the appellate court to only consider whether the court's factual determinations are supported by the evidence and that it acted reasonably in applying its discretion. The burden is on the moving party.
- Here the record that dad provides is inadequate to allow the court to rule in his favor.
- Where the record on appeal is insufficient to allow the court to rule in favor of the movant, the evidence is presumed to have been sufficient to support the judgment.

Federal Tort Claims Act

Gordon v. Tex. Office of the Attorney Gen. Child Support Div., Civil Action
3:23-CV-2088-L (N.D. Tex. May23, 2024).

Gordon v. Tex. Office of the Attorney Gen. Child Support Div., Civil Action 3:23-CV-2088- L (N.D. Tex. May23, 2024).

- Gordon filed against several state officers, state agencies, public schools, and judges.
- The Court liberally construed his several pleadings and amendments and viewed them as seeking to terminate his child support, remove all liens associated with his child support account, reimbursement of wages garnished and a monetary award of treble damages for time spent having to defend this frivolous case and emotional distress.
- CSSD objected to jurisdiction under the 11th amendment and Gordon asserted the CSSD waived sovereign immunity pursuant to the Federal Tort Claims Act and the Texas Tort Claims Act.
- The FTCA applies to federal gov't not a state gov't agency. It would only waive Texas' sovereign immunity only for non-intentional tort claims in three categories: 1 use of publicly owned automobiles, 2 premises defects and 3 injuries arising out of conditions or use of tangible property. Claims around child support obligations fall outside of all three categories.

Gordon v. Tex. Office of the Attorney Gen. Child Support Div., Civil Action 3:23-CV-2088- L (N.D. Tex. May23, 2024).

- Gordon objected that sovereign immunity shouldn't be absolute but this was merely a policy argument so it was overruled.
- Gordon also objected that he was denied to amend his pleading again. The court found this is within the court's discretion and should consider "undue delay, bad faith, repeated failures to cure deficiencies, undue prejudice to the opposing party and futility."
- It was found that to allow him to do so was futile and where a plaintiff has already been given a chance to amend their pleadings and still not established a cause of action, the court should dismiss the suit.
- Case dismissed.

Retroactive Date

In re Marriage of K.C., 126,566 (Kan. App. June 28, 2024).

In re Marriage of K.C., 126,566 (Kan. App. June 28, 2024).

- M and D were divorced in Oklahoma in 2012. Father was ordered to pay support. The parties were engaged in litigation in OK regarding a variety of parenting issues not material to this issue.
- In April 2019, the divorce case was registered in the Johnson County District Court after mother moved with the children to KS. At that time father lived in MO.
- After the case was registered in KS, the parties submitted an agreed order modifying child support.
- Mother filed for protection from abuse against her then husband, who is a registered sex offender, she alleged her husband had sexually abused one of the children. After father learned of this, he also filed a request for protection.

In re Marriage of K.C., 126,566 (Kan. App. June 28, 2024).

- On 12/2/2021 he filed to modify custody, residency, parenting time and child support. He requested sole legal custody of the children and requested mother pay him child support pursuant to the child support worksheet attached. However, it is undisputed that he did not attach the worksheet.
- He requested his CSUP order end on 12/31/21 but did not request a date for mother's order to begin.
- It is unclear what happened over the next year, but hearing was finally had on 2/1/23. The parties stipulated to father's arrears and agreed that his support order be terminated as of 12/31/21 and mother's support obligation would be offset against father's arrears until paid in full.
- They agreed when dad's order stopped, but since he had not filed a child support worksheet yet, they argued under Trial Rule 139 that a worksheet is mandatory.
- The court then asked about the date mom's order would start, dad wanted it to his petition date but court ruled it would also start on 2/1/23 since he had failed to file the worksheet with his pleading.

In re Marriage of K.C., 126,566 (Kan. App. June 28, 2024).

- The district court held that the hearing officer did not abuse his discretion with the effective date for mom's CSUP order. Dad appealed.
- Under K.S.A. 23-3005(b), CSUP orders "may" go back to the date of filing.
- Under K.S.A. 23-3002(b) a domestic relations affidavit and a child support worksheet must be filed with a motion requesting child support or a modification of child support.
- The law requiring the child support worksheet is not fatal, since it is within the discretion of the court to go back to the filing date.
- Since, it is within the court's discretion and dad didn't file the worksheet to complete his filing until 2/1/23 at the hearing, it was also within the court's discretion to choose the hearing date as the effective date.

No Future Modifications

Howard v. Howard, M 2022-01478-COA-R3-CV (Tenn. App. Jul 30, 2024).

Howard v. Howard, M 2022-01478-COA-R3- CV (Tenn. App. Jul 30, 2024).

- The parties married in 2008 in Seoul, South Korea and share three minor children. The parties separated in 2018 while living in Daegu, South Korea and in 2019, executed a separation agreement requiring husband to pay child support for the parties' three children.
- The agreement stated that Dad would pay \$667 per child per month until the first child emancipated and then it would be recalculated using the applicable guideline for the remaining children. The parties further agreed that there would only be a modification for a substantial change in circumstances. Such payments shall continue so long as children live with wife until the emancipation event. And, it included their current incomes.
- Husband filed for divorce in 2021 and requested that the child support be modified pursuant to a provision in the separation agreement.
- Following a bench trial, the court determined the support order should be modified based on a substantial change in circumstances.

Howard v. Howard, M 2022-01478-COA-R3- CV (Tenn. App. Jul 30, 2024).

- However, after a motion to alter or amend from mom, the court reversed its decision and determined the support was non-modifiable. The court found that the parties agreement for dad to pay that amount without modifying was a valid contract governed by contract law in part b/c it was a higher amount than the guidelines provided.
- Caselaw in TN that any amount over the guidelines amount is controlled exclusively by the parties agreement and treated under contract law.
- Dad appealed.
- The court ruled, yes parties may agree to support in excess of the guidelines but it doesn't remain non-modifiable in perpetuity. Rather once it merges into the decree it is modifiable unless it is a provision to extend the duration past the child's age of majority. The courts original order modifying support was correct.
- Second, even if it retained the contractual nature, the agreement included that the order could be modified upon a showing of a substantial change in circumstances.
- Simply put, the trial court got it right the first time, and wife's motion to alter or amend should have been denied as to this issue.

Self-Help Modification and Contempt

O'Malley v. O'Malley, 2024 NY Slip Op 04077, Index No. 800047/21, No. 2022-01568 (N.Y. App. Div. Jul 31, 2024).

O'Malley v. O'Malley, 2024 NY Slip Op 04077, Index No. 800047/21, No. 2022-01568 (N.Y. App. Div. Jul 31, 2024).

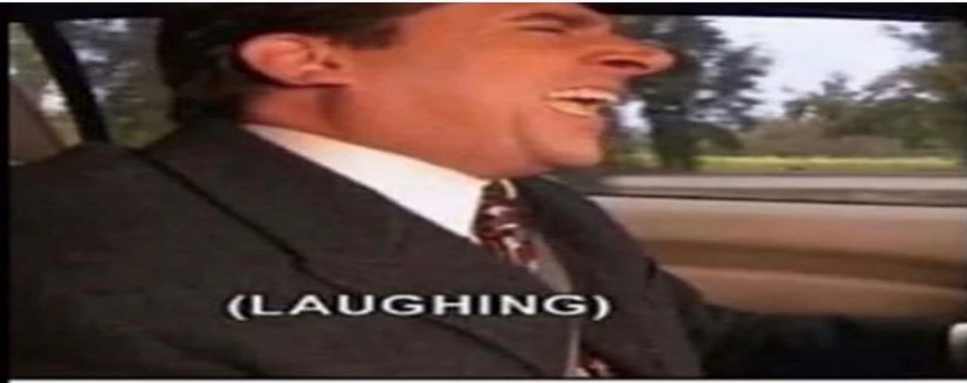
- Parties married in 1988 and have two children. In 2005, the parties entered a stipulation of settlement, which was incorporated but did not merge into a judgment of divorce dated October 31, 2007.
- Mom retained the marital residence but needed to assume the mortgage or refinance it. She never did.
- Dad was ordered to pay child support \$777 biweekly and mom was entitled to 16.5% of his pension.
- In 2010, without modifying the support order started paying a reduced amount of \$285 and in 2012 he stopped paying altogether.
- Upon his retirement, he also failed to pay mom her share of the pension and failed to designate her as an "alternate payee" under the plan.

O'Malley v. O'Malley, 2024 NY Slip Op 04077, Index No. 800047/21, No. 2022-01568 (N.Y. App. Div. Jul 31, 2024).

- In 2021, dad filed to hold mom in contempt for failure to follow the stipulation to refinance the mortgage.
- He also sought monetary awards related to rents she collected and a deficiency judgment resulting from the foreclosure.
- In 2021, mom moved for an award of child support arrears of \$61,000, an award of pension payment arrears and to hold dad in contempt for failing to pay child support and failing to distribute to her 16.5% of his pension.
- Court denied monetary award v. mother, denied she owed him \$30,000 and denied his request to cancel her claim on the pension.
- Court did find dad in contempt for failure to pay child support and for violating the terms in regards to his pension, set child support arrears at \$61,000 and ordered the parties to do a QDRO relating to the distribution of the pension. Dad appealed.

O'Malley v. O'Malley, 2024 NY Slip Op 04077, Index No. 800047/21, No. 2022-01568 (N.Y. App. Div. Jul 31, 2024).

- On appeal, the Court decided it was correct to deny dad's petition because it was in contradiction to the language of the stipulation.
- As to civil contempt, it was appropriate as there was 1. a lawful order in place, 2. dad disobeyed that order, 3. he knew about the order and it's terms, and 4. mom was prejudiced by his offending conduct. The court was also correct to award an arrears judgment for past due pension payments.
- The fact that the children may be currently emancipated does not prevent mom from recovering the arrears that were due prior to emancipation. Dad has not yet filed a modification request on the grounds that the children are emancipated.



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Tribal Court Jurisdiction

Thompson v. Smoker and Thompson, 2023 WL 7108278 (Eastern Cherokee Ct. 9/29/23)

Thompson v. Smoker and Thompson, 2023 WL 7108278 (Eastern Cherokee Ct. 9/29/23)

- Dylan Thompson filed a petition to establish paternity, order genetic testing and child custody and named Sabrina Smoker and Chayton Thompson as defendants.
- He is seeking to establish the paternity of a child MWT, pursuant to NC Gen Stat §49-14 as adopted by Cherokee Code.
- Defendant Smoker filed an answer, request for jury trial and a motion to dismiss.
- The motion to dismiss was due to the child's birth certificate not being attached to the petition and Smoker arguing this deprived the court of jurisdiction.

Thompson v. Smoker and Thompson, 2023 WL 7108278 (Eastern Cherokee Ct. 9/29/23)

- Legal Question Presented: If a copy of the child's birth certificate is not attached to the complaint to establish paternity, as required by the Cherokee Code, does the Cherokee Court lose jurisdiction?
- Jurisdiction for domestic relations cases arises from Cherokee Code § 1-2(b): *The Cherokee Court shall exercise jurisdiction over the domestic relations of all individuals residing on Cherokee trust lands. Jurisdiction shall be exercised for cases including but not limited to child protection and child welfare, divorce, separation, child custody, support, alimony, adoption, guardianship, and paternity.*
- Plaintiff, Defendant Smoker, Defendant Thompson and the minor child all reside on Cherokee trust lands. For this reason jurisdiction is not discretionary.

Thompson v. Smoker and Thompson, 2023 WL 7108278 (Eastern Cherokee Ct. 9/29/23)

- The court rejects, Smoker's motion to dismiss on three grounds:
 - First, The paternity statute is not where jurisdiction resides, rather it is a vehicle to bring a cause of action, but jurisdiction lies in the jurisdiction section of the Cherokee Code.
 - Second, Smoker is relying on NC case law interpreting a NC statute and jurisdiction here is governed by the laws, customs, traditions and precedents of the EBCI. Smoker has not argued jurisdiction was improper under Cherokee Code.
 - Third, this case is distinguishable from the cases Smoker cited. Plaintiff's failure to attach the birth certificate is a procedural defect, not a jurisdictional defect.

Thompson v. Smoker and Thompson, 2023 WL 7108278 (Eastern Cherokee Ct. 9/29/23)

- The Court may allow for plaintiff to remedy the defect, disregard the defect in the interest of justice, or dismiss the complaint.
- Plaintiff has otherwise filed a sufficient complaint; alleging Plaintiff and Smoker had sexual relations at the time of conception, an at-home DNA test indicated Plaintiff is the father and the parties have held Plaintiff out as the father since that test.
- Plaintiff's petition meets all the pleading requirements under NC R. Civ. Pro. 8 and even if it hadn't, the Court may grant Plaintiff leave to amend the Complaint by attaching the birth certificate.

Questions or Discussion

Coming Soon: The ERICSA Bulletin Board!

We are thrilled to announce the upcoming launch of The Bulletin Board for ERICSA! This new platform will be your go-to source for the latest news, updates, and essential information in the child support community.

Key Features:

- Upcoming Events
- State, Regional, Tribal, and International Community Insights
- Legislative Updates

Send us your best practices!

ERICSA is in the process of gathering intergovernmental best practices from the states, territories, tribes, and our international partners, to disseminate to all of our members at future ERICSA events. Please use the email address info@ericsa.org and the heading “Intergovernmental Best Practices” in the subject field, and send us the top ideas you have seen different jurisdictions use when working interstate cases. We will gather and review your recommendations and send out all best practices shortly. Thank you so much!

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