

SECOND REGULAR SESSION
SENATE COMMITTEE SUBSTITUTE FOR
HOUSE COMMITTEE SUBSTITUTE FOR

HOUSE BILLS NOS. 2505 & 2044

103RD GENERAL ASSEMBLY

6301S.03C

KRISTINA MARTIN, Secretary

AN ACT

To repeal sections 452.375, 452.410, and 452.423, RSMo, and to enact in lieu thereof four new sections relating to the custody of children.

Be it enacted by the General Assembly of the State of Missouri, as follows:

Section A. Sections 452.375, 452.410, and 452.423, RSMo,
2 are repealed and four new sections enacted in lieu thereof, to
3 be known as sections 452.375, 452.381, 452.410, and 452.423, to
4 read as follows:

452.375. 1. As used in this chapter, unless the
2 context clearly indicates otherwise:

3 (1) "Custody" means joint legal custody, sole legal
4 custody, joint physical custody or sole physical custody or
5 any combination thereof;

6 (2) "Joint legal custody" means that the parents share
7 the decision-making rights, responsibilities, and authority
8 relating to the health, education and welfare of the child,
9 and, unless allocated, apportioned, or decreed, the parents
10 shall confer with one another in the exercise of decision-
11 making rights, responsibilities, and authority;

12 (3) "Joint physical custody" means an order awarding
13 each of the parents significant, but not necessarily equal,
14 periods of time during which a child resides with or is
15 under the care and supervision of each of the parents.

EXPLANATION-Matter enclosed in bold-faced brackets [thus] in this bill is not enacted and is intended to be omitted in the law.

16 Joint physical custody shall be shared by the parents in
17 such a way as to assure the child of frequent, continuing
18 and meaningful contact with both parents;

19 (4) "Third-party custody" means a third party
20 designated as a legal and physical custodian pursuant to
21 subdivision (5) of subsection 5 of this section.

22 2. The court shall determine custody in accordance
23 with the best interests of the child. There shall be a
24 rebuttable presumption that an award of equal or
25 approximately equal parenting time to each parent is in the
26 best interests of the child. Such presumption is rebuttable
27 only by a preponderance of the evidence in accordance with
28 all relevant factors, including, but not limited to, the
29 factors contained in subdivisions (1) to [(8)] (14) of this
30 subsection. The presumption may **also** be rebutted if the
31 court finds that the parents have reached an agreement on
32 all issues related to custody, or if the court finds that a
33 pattern of domestic violence has occurred as set out in
34 subdivision (6) of this subsection. When the parties have
35 not reached an agreement on all issues related to custody,
36 the court shall consider all relevant factors and enter
37 written findings of fact and conclusions of law, including,
38 but not limited to, the following:

39 (1) The wishes of the child's parents as to custody
40 and the proposed parenting plan submitted by both parties;

41 (2) [The needs of the child for a frequent, continuing
42 and meaningful relationship with both parents and the
43 ability and willingness of parents to actively perform their
44 functions as mother and father for the needs of the child]
45 **The nature and quality of the child's existing relationship**
46 **with each parent, including, but not limited to, the child's**
47 **need for continuity, stability, and emotional security, and**

48 the ability and willingness of each parent to actively
49 perform caregiving functions for the needs of the child. In
50 evaluating this factor, the court may consider, but shall
51 not be required to treat as a presumptive or paramount
52 concern, the frequency or quantity of contact between the
53 child and each parent, and shall instead weigh the overall
54 quality of each parent-child relationship against all other
55 factors enumerated in this subsection;

56 (3) The interaction and interrelationship of the child
57 with parents, siblings, and any other person who may
58 significantly affect the child's best interests;

59 (4) Which parent is more likely to allow the child
60 frequent, continuing and meaningful contact with the other
61 parent;

62 (5) The child's adjustment to the child's home,
63 school, and community. The fact that a parent sends his or
64 her child or children to a home school or FPE school shall
65 not be the sole factor that a court considers in determining
66 custody of such child or children;

67 (6) The mental and physical health of all individuals
68 involved, including any history of abuse of any individuals
69 involved. **Where credible evidence is presented that a**
70 **parent has a current or prior diagnosis of a mental health**
71 **condition that may affect parenting capacity, the court**
72 **shall affirmatively evaluate the following:**

73 (a) The nature and severity of the diagnosed condition;

74 (b) Whether the parent is currently engaged in
75 treatment with a licensed mental health professional,
76 including, but not limited to, psychotherapy, counseling,
77 psychiatric care, or medication management;

78 (c) The parent's degree of compliance with any
79 prescribed or recommended treatment plan, including
80 medication adherence, therapy attendance, and follow-up care;

81 (d) The extent to which the condition, if inadequately
82 treated or unmanaged, poses a risk to the child's physical
83 safety, emotional well-being, or developmental needs; and

84 (e) Any expert testimony or reports from licensed
85 mental health professionals regarding the parent's current
86 functioning, prognosis, and fitness to exercise custodial or
87 visitation responsibilities.

88 A diagnosis of a mental health condition alone shall not be
89 grounds for denying custody or visitation; however, a
90 parent's demonstrated pattern of noncompliance with
91 treatment, or refusal to engage in recommended treatment
92 when noncompliance has resulted in behavior detrimental to
93 the child, may be considered as a factor weighing against an
94 award of custody or unsupervised visitation to that parent.

95 If the court finds that a pattern of domestic violence as
96 defined in section 455.010 has occurred, and, if the court
97 also finds that awarding custody to the abusive parent is in
98 the best interest of the child, then the court shall enter
99 written findings of fact and conclusions of law. Custody
100 and visitation rights shall be ordered in a manner that best
101 protects the child and any other child or children for whom
102 the parent has custodial or visitation rights, and the
103 parent or other family or household member who is the victim
104 of domestic violence from any further harm;

105 (7) The child's need for stability, continuity of
106 care, and consistent routine, as well as the capacity of
107 each parent to provide a safe, stable, and developmentally
108 appropriate environment;

109 (8) The intention of either parent to relocate the
110 principal residence of the child; and

111 [(8)] (9) The unobstructed input of a child, free of
112 coercion and manipulation, as to the child's custodial
113 arrangement;

114 (10) Whether the child's present or past living
115 conditions have had, or are likely to have, an adverse
116 effect on the child's physical, mental, moral, or emotional
117 health or development, including, but not limited to,
118 exposure to substance abuse, domestic violence, or chronic
119 instability in the household;

120 (11) The ability of each parent to encourage and
121 facilitate a close and continuing relationship between the
122 child and the other parent, except where such contact would
123 be harmful to the child, and the willingness of each parent
124 to support the child's relationship with the other parent in
125 a manner free of manipulation, disparagement, or coercion;

126 (12) Whether the past pattern of involvement of each
127 parent with the child reflects a system of values, time
128 commitment, and mutual support that serves the child's
129 developmental needs, and the extent to which each parent has
130 historically participated in caregiving, decision-making,
131 and engagement with the child's educational, medical, and
132 extracurricular activities;

133 (13) The ability of each parent to place the needs of
134 the child ahead of his or her own needs, including the
135 parent's demonstrated capacity for prioritizing the child's
136 emotional security, developmental requirements, and day-to-
137 day welfare over personal preferences or conflicts with the
138 other parent; and

139 (14) The impact of any history of domestic violence,
140 as defined in section 455.010, on the child, regardless of

141 **whether the child was a direct victim, including the effects**
142 **of exposure to coercive control, intimidation, or fear**
143 **within the household on the child's emotional,**
144 **psychological, and behavioral functioning.**

145 3. (1) In any court proceedings relating to custody
146 of a child, the court shall not award custody or
147 unsupervised visitation of a child to a parent if such
148 parent or any person residing with such parent has been
149 found guilty of, or pled guilty to, any of the following
150 offenses when a child was the victim:

151 (a) A felony violation of section 566.030, 566.031,
152 566.032, 566.060, 566.061, 566.062, 566.064, 566.067,
153 566.068, 566.083, 566.100, 566.101, 566.111, 566.151,
154 566.203, 566.206, 566.209, 566.211, or 566.215;

155 (b) A violation of section 568.020;

156 (c) A violation of subdivision (2) of subsection 1 of
157 section 568.060;

158 (d) A violation of section 568.065;

159 (e) A violation of section 573.200;

160 (f) A violation of section 573.205; or

161 (g) A violation of section 568.175.

162 (2) For all other violations of offenses in chapters
163 566 and 568 not specifically listed in subdivision (1) of
164 this subsection or for a violation of an offense committed
165 in another state when a child is the victim that would be a
166 violation of chapter 566 or 568 if committed in Missouri,
167 the court may exercise its discretion in awarding custody or
168 visitation of a child to a parent if such parent or any
169 person residing with such parent has been found guilty of,
170 or pled guilty to, any such offense.

171 4. The general assembly finds and declares that it is
172 the public policy of this state that [frequent, continuing

173 and meaningful contact with both parents after the parents
174 have separated or dissolved their marriage is in the best
175 interest of the child, except for cases where the court
176 specifically finds that such contact is not in the best
177 interest of the child, and that it is the public policy of
178 this state to encourage parents to participate in decisions
179 affecting the health, education and welfare of their
180 children, and to resolve disputes involving their children
181 amicably through alternative dispute resolution], **when**
182 **consistent with the best interests of the child, maintaining**
183 **a meaningful relationship with both parents after the**
184 **parents have separated or dissolved their marriage should be**
185 **facilitated by the court. This policy shall not operate as**
186 **a presumption in favor of any particular custody**
187 **arrangement, and the court retains full discretion to**
188 **determine that the child's safety, emotional well-being,**
189 **developmental needs, or other best-interest factors outweigh**
190 **the interest in maximizing parenting time with both**
191 **parents. It is further the public policy of this state to**
192 **encourage parents to participate in decisions affecting the**
193 **health, education, and welfare of their children, and to**
194 **resolve disputes involving their children amicably through**
195 **alternative dispute resolution.** In order to effectuate
196 these policies, the general assembly encourages the court to
197 enter a temporary parenting plan as early as practicable in
198 a proceeding under this chapter, consistent with the
199 provisions of subsection 2 of this section, and, in so
200 doing, the court shall determine the custody arrangement
201 [which will best assure both parents participate in such
202 decisions and have frequent, continuing and meaningful
203 contact with their children so long as it is in the best
204 interests of the child] **that best serves the child's overall**

205 **well-being as measured by the totality of the factors**
206 **enumerated in subsection 2 of this section.**

207 5. Prior to awarding the appropriate custody
208 arrangement in the best interest of the child, the court
209 shall consider each of the following as follows:

210 (1) Joint physical and joint legal custody to both
211 parents, which shall not be denied solely for the reason
212 that one parent opposes a joint physical and joint legal
213 custody award. The residence of one of the parents shall be
214 designated as the address of the child for mailing and
215 educational purposes;

216 (2) Joint physical custody with one party granted sole
217 legal custody. The residence of one of the parents shall be
218 designated as the address of the child for mailing and
219 educational purposes;

220 (3) Joint legal custody with one party granted sole
221 physical custody;

222 (4) Sole custody to either parent; or

223 (5) Third-party custody or visitation:

224 (a) When the court finds that each parent is unfit,
225 unsuitable, or unable to be a custodian, or the welfare of
226 the child requires, and it is in the best interests of the
227 child, then custody, temporary custody or visitation may be
228 awarded to a person related by consanguinity or affinity to
229 the child **with priority given to the grandparent or**
230 **grandparents of the child.** If no person related to the
231 child by consanguinity or affinity is willing to accept
232 custody, then the court may award custody to any other
233 person or persons deemed by the court to be suitable and
234 able to provide an adequate and stable environment for the
235 child. Before the court awards custody, temporary custody

236 or visitation to a third person under this subdivision, the
237 court shall make that person a party to the action;

238 (b) Under the provisions of this subsection, any
239 person may petition the court to intervene as a party in
240 interest at any time as provided by supreme court rule.

241 6. If the parties have not agreed to a custodial
242 arrangement, or the court determines such arrangement is not
243 in the best interest of the child, the court shall include a
244 written finding in the judgment or order based on the public
245 policy in subsection 4 of this section and each of the
246 factors listed in subdivisions (1) to **[(8)] (14)** of
247 subsection 2 of this section detailing the specific relevant
248 factors that made a particular arrangement in the best
249 interest of the child. If a proposed custodial arrangement
250 is rejected by the court, the court shall include a written
251 finding in the judgment or order detailing the specific
252 relevant factors resulting in the rejection of such
253 arrangement.

254 7. Upon a finding by the court that either parent has
255 refused to exchange information with the other parent, which
256 shall include but not be limited to information concerning
257 the health, education and welfare of the child, the court
258 shall order the parent to comply immediately and to pay the
259 prevailing party a sum equal to the prevailing party's cost
260 associated with obtaining the requested information, which
261 shall include but not be limited to reasonable attorney's
262 fees and court costs.

263 8. As between the parents of a child, no preference
264 may be given to either parent in the awarding of custody
265 because of that parent's age, sex, or financial status, nor
266 because of the age or sex of the child. The court shall not
267 presume that a parent, solely because of his or her sex, is

268 more qualified than the other parent to act as a joint or
269 sole legal or physical custodian for the child.

270 9. Any judgment providing for custody shall include a
271 specific written parenting plan setting forth the terms of
272 such parenting plan arrangements specified in subsection 8
273 of section 452.310. Such plan may be a parenting plan
274 submitted by the parties pursuant to section 452.310 or, in
275 the absence thereof, a plan determined by the court, but in
276 all cases, the custody plan approved and ordered by the
277 court shall be in the court's discretion and shall be in the
278 best interest of the child.

279 10. After August 28, 2016, every court order
280 establishing or modifying custody or visitation shall
281 include the following language: "In the event of
282 noncompliance with this order, the aggrieved party may file
283 a verified motion for contempt. If custody, visitation, or
284 third-party custody is denied or interfered with by a parent
285 or third party without good cause, the aggrieved person may
286 file a family access motion with the court stating the
287 specific facts that constitute a violation of the custody
288 provisions of the judgment of dissolution, legal separation,
289 or judgment of paternity. The circuit clerk will provide
290 the aggrieved party with an explanation of the procedures
291 for filing a family access motion and a simple form for use
292 in filing the family access motion. A family access motion
293 does not require the assistance of legal counsel to prepare
294 and file."

295 11. No court shall adopt any local rule, form, or
296 practice requiring a standardized or default parenting plan
297 for interim, temporary, or permanent orders or judgments.
298 Notwithstanding any other provision of law to the contrary,
299 a court may enter an interim order in a proceeding under

300 this chapter, provided that the interim order shall not
301 contain any provisions about child custody or a parenting
302 schedule or plan without first providing the parties with
303 notice and a hearing, unless the parties otherwise agree.

304 12. Unless a parent has been denied custody rights
305 pursuant to this section or visitation rights under section
306 452.400, both parents shall have access to records and
307 information pertaining to a minor child including, but not
308 limited to, medical, dental, and school records. If the
309 parent without custody has been granted restricted or
310 supervised visitation because the court has found that the
311 parent with custody or any child has been the victim of
312 domestic violence, as defined in section 455.010, by the
313 parent without custody, the court may order that the reports
314 and records made available pursuant to this subsection not
315 include the address of the parent with custody or the
316 child. A court shall order that the reports and records
317 made available under this subsection not include the address
318 of the parent with custody if the parent with custody is a
319 participant in the address confidentiality program under
320 section 589.663. Unless a parent has been denied custody
321 rights pursuant to this section or visitation rights under
322 section 452.400, any judgment of dissolution or other
323 applicable court order shall specifically allow both parents
324 access to such records and reports.

325 13. Except as otherwise precluded by state or federal
326 law, if any individual, professional, public or private
327 institution or organization denies access or fails to
328 provide or disclose any and all records and information,
329 including, but not limited to, past and present dental,
330 medical and school records pertaining to a minor child, to
331 either parent upon the written request of such parent, the

332 court shall, upon its finding that the individual,
333 professional, public or private institution or organization
334 denied such request without good cause, order that party to
335 comply immediately with such request and to pay to the
336 prevailing party all costs incurred, including, but not
337 limited to, attorney's fees and court costs associated with
338 obtaining the requested information.

339 14. An award of joint custody does not preclude an
340 award of child support pursuant to section 452.340 and
341 applicable supreme court rules. The court shall consider
342 the factors contained in section 452.340 and applicable
343 supreme court rules in determining an amount reasonable or
344 necessary for the support of the child.

345 15. If the court finds that domestic violence or abuse
346 as defined in section 455.010 has occurred, the court shall
347 make specific findings of fact to show that the custody or
348 visitation arrangement ordered by the court best protects
349 the child and the parent or other family or household member
350 who is the victim of domestic violence, as defined in
351 section 455.010, and any other children for whom such parent
352 has custodial or visitation rights from any further harm.

**452.381. 1. During the pendency of an action seeking
2 a modification of any judgment pertaining to child custody
3 or visitation, upon the motion of any party and with notice
4 to all other parties and after a hearing, the court may make
5 temporary orders relative to the custody and visitation of
6 the child subject to the judgment being modified. Any such
7 order shall remain in effect until the disposition of the
8 motion to modify or until further order of the court.**

9 **2. Notwithstanding the provisions of subsection 1 of
10 this section to the contrary, an order entered relative to
11 custody or visitation under this section may be entered**

12 without notice to opposing parties if the court finds that
13 an emergency exists, the nature of which requires the court
14 to act before opposing parties can be heard in opposition,
15 including, but not limited to, an emergency in which the
16 child faces immediate or imminent risk of physical harm,
17 emotional harm, psychological injury, or medical neglect
18 because of:

19 (1) A parent's deteriorating mental health, as
20 evidenced by observable behavior, professional reports, or
21 other credible evidence;

22 (2) A parent's failure to comply with a prescribed or
23 recommended treatment plan for a diagnosed mental health
24 condition, where such noncompliance has resulted in or is
25 reasonably likely to result in conduct that endangers the
26 child;

27 (3) Reports from licensed medical or mental health
28 professionals indicating a parent's instability,
29 decompensation, or inability to safely exercise custodial or
30 visitation responsibilities;

31 (4) A pattern of emotional volatility, coercive
32 behavior, or erratic conduct by a parent that creates a
33 substantial risk of harm to the child; or

34 (5) A parent's refusal to submit to a mental health
35 evaluation when ordered by the court pursuant to subsection
36 7 of this section or section 452.375.

37 In all such cases, the order shall be for a period not to
38 exceed fifteen days or until further order of the court, and
39 written notice of the issuance of any such order and the
40 reasons for it shall be given to opposing parties, along
41 with notice of the date, time, and place that a hearing on
42 the continuation of the order will be held.

43 3. No temporary order shall deny parenting time to a
44 parent or any other party granted custody or visitation
45 under the judgment for which modification is sought, unless
46 the court finds that parenting time is likely to cause
47 physical or emotional harm to the child.

48 4. If temporary parenting time is ordered, the court
49 may also order temporary child support or temporarily modify
50 any existing child support orders if requested by any party.

51 5. A temporary parenting plan issued under this
52 section shall not prejudice the rights of the parties or the
53 child that are to be adjudicated at subsequent hearings in
54 the proceeding.

55 6. Dismissal of the motion to modify shall
56 automatically vacate any temporary order issued under this
57 section.

58 7. In any proceeding under this section in which a
59 parent's mental health is at issue, the court may order an
60 independent mental health evaluation of any parent by a
61 licensed mental health professional. The evaluator shall
62 submit a written report to the court addressing the parent's
63 current diagnosis, treatment compliance, functional capacity
64 for parenting, and any recommended safeguards or conditions
65 on custody or visitation. The cost of such evaluation shall
66 be apportioned by the court as it deems equitable.

 452.410. 1. Except as provided in subsection 2 of
2 this section, the court shall not modify a prior custody
3 decree unless it has jurisdiction under the provisions of
4 section 452.745 and it finds, upon the basis of facts that
5 have arisen since the prior decree or that were unknown to
6 the court at the time of the prior decree, that a change has
7 occurred in the circumstances of the child or his custodian
8 and that the modification is necessary to serve the best

9 interests of the child. Notwithstanding any other provision
10 of this section or sections 452.375 and 452.400 to the
11 contrary, any custody order entered by any court in this
12 state or any other state may, subject to jurisdictional
13 requirements, be modified to allow for joint custody or
14 visitation only in accordance with section 452.375, 452.400,
15 452.402, or 452.403.

16 2. If either parent files a motion to modify an award
17 of joint legal custody or joint physical custody, each party
18 shall be entitled to a change of judge as provided by
19 supreme court rule.

20 3. If the parties have agreed to terms for
21 modification of custody or visitation of the child, the
22 parties may submit to the court a proposed parenting plan
23 signed, under oath, by all parties having rights of custody
24 or visitation under the existing custody or visitation
25 judgment. The proposed plan shall be accompanied by a
26 motion, signed under oath by all parties, requesting a
27 modification of the existing parenting plan and no statement
28 of any changes in circumstances shall be required. If the
29 court determines that the proposed plan is in the child's
30 best interests, then the court shall enter an order granting
31 custody or visitation according to the proposed parenting
32 plan as soon as possible following the filing.

33 4. As used in this section and in cases where one or
34 more children subject to a custody order have special needs
35 or disabilities, a change of circumstances may include one
36 parent's neglect or harm of the best interests of the child
37 or children with special needs or disabilities. A change of
38 circumstances under this section may also include a
39 custodial parent's failure to comply with a prescribed or
40 recommended treatment plan for a diagnosed mental health

41 condition, where such noncompliance has materially impaired
42 the parent's ability to meet the particular caregiving,
43 therapeutic, medical, or developmental needs of the child or
44 children with special needs or disabilities. In evaluating
45 a motion to modify under this section, the court shall
46 consider any evidence of the parent's current mental health
47 status, treatment compliance, and the impact of any
48 noncompliance on the child's safety, stability, and access
49 to necessary services.

452.423. 1. In all proceedings for child custody or
2 for dissolution of marriage or legal separation where
3 custody, visitation, or support of a child is a contested
4 issue, the court may appoint a guardian ad litem.
5 Disqualification of a guardian ad litem shall be ordered in
6 any legal proceeding only pursuant to this chapter, upon the
7 filing of a written application by any party within ten days
8 of appointment, or within ten days of August 28, 1998, if
9 the appointment occurs prior to August 28, 1998. Each party
10 shall be entitled to one disqualification of a guardian ad
11 litem appointed under this subsection in each proceeding,
12 except a party may be entitled to additional
13 disqualifications of a guardian ad litem for good cause
14 shown.

15 2. The court shall appoint a guardian ad litem in any
16 proceeding in which child abuse or neglect is alleged.

17 3. The guardian ad litem shall:

18 (1) Be the legal representative of the child at the
19 hearing, and may examine, cross-examine, subpoena witnesses
20 and offer testimony;

21 (2) Prior to the hearing, conduct all necessary
22 interviews with persons having contact with or knowledge of
23 the child in order to ascertain the child's wishes,

24 feelings, attachments and attitudes. If appropriate, the
25 child should be interviewed;

26 (3) **Review relevant medical, educational, and**
27 **therapeutic records and consult treating professionals when**
28 **appropriate, assess special medical or developmental needs,**
29 **and evaluate household stability and continuity of care; and**

30 (4) Request the juvenile officer to cause a petition
31 to be filed in the juvenile division of the circuit court if
32 the guardian ad litem believes the child alleged to be
33 abused or neglected is in danger.

34 4. **The guardian ad litem shall submit a written report**
35 **summarizing the investigative steps taken and the factual**
36 **basis for any recommendations. The court shall review the**
37 **report to ensure compliance with the provisions of this**
38 **section and any other duties required under law prior to**
39 **adopting any of the recommendations contained within.**

40 5. The appointing judge shall require the guardian ad
41 litem to faithfully discharge such guardian ad litem's
42 duties, and upon failure to do so shall discharge such
43 guardian ad litem and appoint another. The judge in making
44 appointments pursuant to this section shall give preference
45 to persons who served as guardian ad litem for the child in
46 the earlier proceeding, unless there is a reason on the
47 record for not giving such preference.

48 [5.] 6. The guardian ad litem shall be awarded a
49 reasonable fee for such services to be set by the court.
50 The court, in its discretion, may:

51 (1) Issue a direct payment order to the parties. If a
52 party fails to comply with the court's direct payment order,
53 the court may find such party to be in contempt of court; or

54 (2) Award such fees as a judgment to be paid by any
55 party to the proceedings or from public funds. Such an

56 award of guardian fees shall constitute a final judgment in
57 favor of the guardian ad litem. Such final judgment shall
58 be enforceable against the parties in accordance with
59 chapter 513.

60 **7. A guardian ad litem appointed under this section**
61 **shall have received training in child development, trauma-**
62 **informed practices, domestic violence dynamics, coercive**
63 **control, mental health disorders affecting parenting**
64 **capacity, and considerations for children with special**
65 **needs. Such training may be part of any training or**
66 **education otherwise required of a guardian ad litem under**
67 **law.**

✓