**Cases Related to Guardians ad Litem for Juvenile (G.S. 7B-601)**

Appointment & Duties

Appointment of Guardian ad Litem Program staff satisfies G.S. 7B-601. *In re ANL*, 213 N.C. App. 266, 714 S.E.2d 189 (2011).

Failure to appoint GAL for juvenile in TPR proceeding when an answer was filed the day of the hearing was reversible error. *In re JLS*, 168 N.C. App. 721, 608 S.E.2d 823 (2005).

Appointment of attorney advocate in dual role of GAL three days into TPR hearing was reversible error where investigatory duties not fulfilled. *In re RAH*, 171 N.C. App. 427, 614 S.E.2d 382 (2005).

Performance of duties cures lack of GAL appointment order in record. *In re ADL, JSL, CLL*, 169 N.C. App. 701, 612 S.E.2d 639 (2005), *disc. review denied*, 359 N.C. 852, 619 S.E.2d 402 (2005); *In re AS,* 190 N.C. App. 679, 661 S.E.2d 313 (2008); *In re DWC*, 205 N.C. App. 266, 698 S.E.2d 79 (2010).

Lack of GAL presence during some hearings in underlying matter may not be raised in appeal of TPR order where the GAL was present and represented the children. *In re JE & QD*, 362 N.C. 168, 655 S.E.2d 831 (2008), *rvsd.* *per curiam* *based on dissent* *in*, *In re JE & QD*, 183 N.C. App. 217, 644 S.E.2d 28 (2007). *See also In re OC*, 171 N.C. App. 457, 615 S.E.2d 391 (2005); *In re NB*, 200 N.C. App. 773, 688 S.E.2d 713 (TPR orders when the children were represented by a GAL at the TPR hearing but were unrepresented during prior hearings not on direct appeal).

Team Representation

GAL volunteer’s physical presence at TPR proceeding is not required. The GAL program "represents" a juvenile within the meaning of G.S. 7B-601, 7B-1108 by performing the duties listed in G.S. 7B-601. (Discussion of “team representation” of GAL Program). *In re JHK, JDK*, 365 N.C. 171, 711 S.E.2d 118 (2011).

Where GAL staff properly verified TPR petition, GAL Staff has standing as member of team to bring TPR action and the court properly exercised subject matter jurisdiction. *In re STB*, 761 S.E.2d 734, \_\_\_ N.C. App. \_\_\_ (2014).

Confidential Information

GAL had a right to inquire into the handling of a minor child's adoption, and trial court had jurisdiction to order DSS to turn over requested information regarding potential adoptive homes. *In re NCL*, 89 N.C. App. 79, 365 S.E.2d 213, *cert. denied*, 322 N.C. 481, 370 S.E.2d 226 (1988).

Court may order release of confidential information to GAL which the GAL deems relevant to determine the needs of the juvenile. *Wilkerson v. Riffel*, 72 N.C. App. 220, 324 S.E.2d 31 (1984).