



**IN THE CIRCUIT COURT OF MADISON COUNTY
STATE OF ALABAMA**

RYAN MAGERS, individually and as the
personal representative of the Estate of
BABY ROE,

Plaintiff,

v.

ALABAMA WOMEN'S CENTER FOR
REPRODUCTIVE ALTERNATIVES, LLC;
JOHN DOE #1, JOHN DOE #2, and JOHN
DOE #3, being agents, employees,
directors, representatives, contractors, or
servants of Alabama Women's Center for
Reproductive Alternatives, LLC; and
UNKNOWN PHARMACEUTICAL
COMPANY, being the manufacturer and
distributor of a pill designed to kill unborn
children; all of whose true and correct
names are otherwise unknown to Plaintiff
at this time, but will be added by
amendment when properly ascertained,

Defendants.

Case No. CV-2019-900259.00

**PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S
COMPLAINT**

COMES NOW Plaintiff Ryan Magers, as the personal representative of the Estate of Baby Roe, and, by and through undersigned counsel, files this Plaintiff's Response to Defendant's Motion to Dismiss Plaintiff's Complaint. For the reasons set forth below, Plaintiff Ryan Magers respectfully requests that this Court deny Defendant Alabama

Women's Center for Reproductive Alternatives, LLC's (hereinafter "Alabama Women's Center") Motion to Dismiss Plaintiff's Complaint.

I. INTRODUCTION

For the first time in history, a six-week old unborn aborted child has been granted personhood. That child is Baby Roe, the unborn aborted child of Ryan Magers. Having been granted personhood, Baby Roe has triggered his or her specifically guaranteed constitutional rights under the Fourteenth Amendment to "life," "due process," and "equal protection" not only for him or herself, but for all unborn children. And now, Baby Roe seeks to vindicate him or herself from the wrongful termination of his or her life.

II. BABY ROE IS A PERSON

On February 6, 2019, Madison County Probate Judge Frank Barger issued a Decree Granting Letters of Administration (the "Decree") in the Estate of Baby Roe, decreeing that Baby Roe "is a **person**." Exhibit A, p. 1, ¶ 6. (Emphasis added). Subsequently, duly certified Letters of Administration (the "Letters") were issued to Ryan Magers as the personal representative of the Estate of Baby Roe. Exhibit B. In granting letters of administration to Ryan Magers, the Madison County Probate Court "is presumed to have ascertained every fact upon which the power to issue letters depends." *Smith v. Smith*, 103 So. 557 (Ala. 1925).

III. AS THE PERSONAL REPRESENTATIVE OF BABY ROE'S ESTATE, RYAN MAGERS HAS STANDING TO SUE DEFENDANT ALABAMA WOMEN'S CENTER PURSUANT TO SECTION 6-5-410 OF THE CODE OF ALABAMA

Alabama's wrongful-death statute is found in Section 6-5-410 of the Code of Alabama. On February 6, 2019, pursuant to and in compliance with Section 6-5-410, Ryan Magers commenced a wrongful-death action against Defendant Alabama Women's Center in Madison County, Alabama as the personal representative of the Estate of Baby Roe. Complaint, p.1.

"Section 6-5-410 provides that the personal representative of the deceased may bring a wrongful death action. A 'personal representative,' for the purposes of § 6-5-410, is an executor or an administrator. *Hatas v. Partin*, 278 Ala. 65, 175 So.2d 759 (1965). " *Waters v. Hipp*, 600 So. 2d 981, 982 (Ala. 1992). In his Decree, Judge Barger ordered that Ryan Magers be named "'Personal Representative' of [Baby Roe's] estate." Exhibit A, p. 2, ¶ 2. In accordance with his Decree, on February 6, 2019, Judge Barger issued duly certified Letters to Ryan Magers, naming him the personal representative of the Estate of Baby Roe. Since their issuance, the Letters have continued in full force and effect.

Having been named the personal representative of the Estate of Baby Roe and having complied with all requisite statutes for the filing of the wrongful-death action on behalf of the Estate of Baby Roe, Ryan Magers has standing. Therefore, the complaint

should not be dismissed for lack of standing pursuant to Section 6-5-410 of the Code of Alabama.

IV. THE COMPLAINT SATISFIES ALA. CODE § 6-5-551

1. The Complaint Provides Defendant Alabama Women’s Center “Fair Notice” and the Time and Place the Alleged Wrongful Act Occurred

The Supreme Court of Alabama has held that under § 6-5-551, "although every element of the cause of action need not be stated with particularity, the plaintiff must provide the defendant health care provider **fair notice** of the allegedly negligent act and must identify the time and place it occurred and the resulting harm." *Mikkelsen v. Salama*, 619 So. 2d 1382, 1384 (Ala. 1993) (Emphasis added). If "the complaint affords the defendant health care provider **fair notice** of these essential elements, the courts should strive to find that the complaint includes the necessary 'detailed specification and factual description of each act and omission alleged by plaintiff to render the health care provider liable to plaintiff.'" *Id.* (citations omitted) (Emphasis added).

The entire section of the complaint labeled "Facts" coupled with "Count I" provide "fair notice" of the wrongful act alleged. And paragraphs contained within the aforementioned sections of the complaint contain both the "time and place" the alleged wrongful act occurred. The Alabama Supreme Court stated that "[n]othing in § 6-5-551 purports to require, or suggests, that the specifically alleged [wrongful] acts and omissions each be considered as claims 'separate and independent' from one another." *Long v. Wade*, 980 So. 2d 378, 390 (Ala. 2007). Therefore, the complaint should not be

dismissed on grounds that it does not satisfy the pleading requirements set forth in Ala. Code § 6-5-551 (1975).

2. The Complaint States a Claim Whereupon Relief *Can* be Granted

In *Nance v. Matthews*, the Alabama Supreme Court set forth the standard of review applicable to an order granting a motion to dismiss: "The appropriate standard of review under Rule 12(b)(6) is whether, when the allegations of the complaint are viewed most strongly in the pleader's favor, it appears that the pleader could prove ***any*** set of circumstances that would entitle [the plaintiff] to relief." 622 So. 2d 297, 299 (Ala. 1993) (Emphasis added). Those allegations in the complaint must be construed "so as to 'resolve all doubts concerning [their] sufficiency in favor of the [plaintiff].'" *A.W. v. Wood*, 57 So. 3d 751, 756 (Ala. 2010) (citations omitted). And in reviewing and construing the allegations in favor of the plaintiff, the court "does not consider whether the plaintiff will ultimately prevail, but only whether [he] ***may possibly prevail***." *Price v. Ala. One Credit Union (Ex parte Price)*, 244 So. 3d 949, 55-56 (Ala. 2017) (Emphasis added). Furthermore, a 12(b)(6) dismissal "is proper only when it appears ***beyond doubt*** that the plaintiff can prove no set of facts in support of the claim that would entitle the plaintiff to relief." *Id.*

When the complaint is viewed in a light most favorable to plaintiff, the complaint demonstrates that Baby Roe is entitled to relief based on the circumstances. The complaint's allegations, when viewed as a whole, reveal the following: (1) Baby Roe is a person; (2) Baby Roe's life was terminated without due process or equal protection

under the Constitution; and (3) it is wrongful to terminate the life of a person in violation of his or her Constitutional rights. It is “beyond doubt” that Baby Roe is a person, that Baby Roe should have been afforded constitutional rights but was not, and that the termination of Baby Roe’s life was therefore wrongful. Consequently, the complaint should not be dismissed based on a failure to state a claim for which relief can be granted.

V. PLAINTIFF’S CLAIM FOR THE WRONGFUL DEATH OF PERSON IS COGNIZABLE UNDER *ROE V. WADE* AND THE UNITED STATES CONSTITUTION

1. *Roe v. Wade* Establishes Baby Roe’s Specifically Guaranteed Constitutional Rights Under the Fourteenth Amendment

In *Roe v. Wade*, Justice Blackman addressed the State of Texas’ argument that “the fetus is a ‘person’ within the language and meaning of the Fourteenth Amendment.” *Id.* at 156. In response to Texas’ argument, Justice Blackman responded with absolute certainty and understanding of the Constitution when he stated, “[i]f this suggestion of **personhood is established, the appellant’s case, of course, collapses, for the fetus’ right to life would then be guaranteed specifically by the Amendment.**” *Id.* (Emphasis added). The Amendment referred to by Justice Blackmun is the Fourteenth Amendment, which guarantees a “person” the right to “life,” “due process,” and “equal protection.” And on reargument, the appellant, Jane Doe, conceded that her case would “collapse” and that “the fetus’ right to life would then be

guaranteed specifically by the Amendment" should "personhood" be "established." *Id.* at 156-57.

As a "person" within the meaning of *Roe*, Baby Roe's "right to life" is "guaranteed specifically by the [Fourteenth] Amendment." *Id.* at 156. Alternatively, if Baby Roe is to be deprived of his or her life, he or she is entitled to "due process" and "equal protection" under the Fourteenth Amendment. Not only was Baby Roe deprived of his or her "right to life" by Defendant Alabama Women's Center, but he or she was denied "due process" and "equal protection" under the Fourteenth Amendment.

A. *Roe* Vests States With the Prerogative to Recognize Personhood

After noting that the natural consequence of the establishment of "personhood" for the unborn is the specific guarantee of Constitutional rights, Justice Blackmun stated that "the word 'person,' as used in the Fourteenth Amendment, does not include the unborn." *Id.* at 157. Interestingly, he also stated that "[t]he Constitution does not explicitly mention any right of privacy" yet one was established. *Id.* at 152. As part of the Court's rationale in responding to Texas' personhood argument, Justice Blackmun took issue with the fact that the Texas law did not fully treat unborn children as persons. *Id.* at 157 n.54. Therefore, it follows that if a State cures the problem that was present in *Roe*, declaring that all unborn children are persons, then the State can legally grant constitutional rights to the unborn, causing the case for abortion to collapse.

If there is one State in the Union that has recognized the personhood of the unborn, it is the State of Alabama. The Supreme Court of Alabama, in its recent decisions in *Mack v. Carmack*, 79 So.3d 597 (Ala.2011), *Hamilton v. Scott*, 97 So.3d 728 (Ala.2012) (*Hamilton I*), *Ex parte Ankrom*, 152 So.3d 397 (Ala.2013), *Ex parte Hicks*, 153 So. 3d 53 (Ala. 2014), *Stinnett v. Kennedy*, 232 So. 3d 202 (Ala. 2016), *Hamilton v. Scott*, No. 1150377 (Ala. Mar. 9, 2018) (*Hamilton II*), and *Ex parte Philips*, No. 1160403 (Ala. Oct. 19, 2018) have “consistently [recognized] that an unborn child “is a human being from the earliest stage of development and thus possesses the same right to life as a born person.” *Hicks*, 153 So. 3d at 73-74. And in those same cases, unborn children have been afforded constitutional rights and state-mandated rights, including the right to maintain wrongful-death cases. Additionally, the Court has called into question *Roe’s* reasoning, applicability, and sustainability.

The Alabama Legislature, through the passage of State law, has granted statutory personhood to the unborn. See Sections 13A-6-1(a)(3), 6-5-391, 6-5-410, 26-15-3.2, 26-22-1(a), 26-21-1(d), 26-21-1(e), and 26-23B-2. And most recently, the Alabama Legislature passed (and Governor Ivey signed) Act 2019-189, which outlawed performing abortions in the State of Alabama in most circumstances. It also made the commission of that offense a Class A felony, punishable by up to 99 years in prison.

If there were still any ambiguity as to whether the State of Alabama recognized the personhood of unborn children, this Court should consider that on November 6,

2018, the People of Alabama ratified Amendment 930 to the Alabama Constitution of 1901, which acknowledges that unborn children have the right to life and that “it is the public policy of this state to ensure the protection of the rights of the unborn child in all manners and measures lawful and appropriate.” Ala. Const. amend. 930 § § (a)-(b). Thus, the Alabama Constitution and the People of Alabama recognize that unborn children are persons.

2. The Constitution Affords Baby Roe Specifically Guaranteed Constitutional Rights Under the Fourteenth Amendment

The United States Constitution is “the Supreme Law of the Land” and “all . . . judicial Officers, both of the United States and of the several states, shall be bound by Oath or Affirmation, to support [the] Constitution.” U.S. Const. art. VI, cls. 2-3. In accordance with the Constitution, before assuming office in Alabama, “all officers, executive and judicial” are required, based on the Constitution of Alabama, to swear or affirm an allegiance to the Constitution of the United States. In relevant part, every judicial officer of the State of Alabama, swears to “support the Constitution of the United States.” Ala. Const., § 279. Thus, this Court’s allegiance is to the Constitution.

Now, for the first time in American history, Baby Roe, an unborn aborted six-week-old child has been granted legal personhood. Consequently, Baby Roe triggered and is entitled to specifically guaranteed constitutional rights, which allow him or her to vindicate the wrongful termination of his or her life. And the only officers able to grant

Baby Roe his or her specifically guaranteed constitutional rights are judicial officers sworn to uphold the Constitution.

The Supreme Law of the Land is unequivocal, Baby Roe shall not be deprived of “life . . . without due process of law; nor” shall Baby Roe be denied “the equal protection of the laws.” U.S. Const. amend. XIV, § 1. “Our Constitution presupposes a respect for the personhood of every individual, and nowhere is strict adherence to that principle more essential than in the Judicial Branch.” *Cruzan ex rel. Cruzan v. Director, Missouri Department of Health*, 497 U.S. 261, 255 (1990) (citations omitted). This court’s allegiance to and duty to protect and uphold the Constitution require that it recognize Baby Roe’s specifically guaranteed constitutional rights based on the Fourteenth Amendment to the Constitution. It is the job of the jury to decide the culpability of Defendant Alabama Women’s Center.

VI. PLANNED PARENTHOOD OF SE. PENN. V. CASEY AND ITS PROGENY DO NOT APPLY

In *Planned Parenthood of Se. Penn. v. Casey*, the United States Supreme Court held that state laws regulating previability abortions are unconstitutional if they impose an “undue burden” on a woman’s right to abortion. 505 U.S. 833, 876 (1992). The “undue burden” spoken of in *Casey* refers to “a state regulation.” *Id.* at 877. In this case, there is no “state regulation” that places an “undue burden” on a woman’s right to abortion. Instead, there is recognition of specifically guaranteed constitutional rights for Baby Roe

as established in the Constitution and recognized in *Roe*. Consequently, *Casey* nor its progeny apply.

VII. CONCLUSION

The first official action of this nation, the Declaration of Independence, declared the foundation of government in these words: "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable rights, that among these are *life*, liberty and the pursuit of happiness." Declaration of Independence § 2 (U.S. 1776) (Emphasis added). Likewise, the preamble to the Alabama Constitution states that "all men are created equally free and independent; that they are endowed by their Creator with certain inalienable rights; that among these are *life*, liberty, and the pursuit of happiness." Ala. Const. § 1 (Emphasis added). The Alabama Supreme Court has stated that "[t]his inalienable right is a proper subject of protection by our laws at all times ***and in every respect***." *Ex parte Hicks*, 153 So. 3d 53, 73 (Ala. 2014) (Parker, J., concurring specially). Such absolute and all-encompassing language unquestionably includes aborted children. And the United States Supreme Court agrees.

In equally absolute and all-encompassing language, the United States Supreme Court, in 1897, stated that "it is ***always*** safe to read the letter of the Constitution in the spirit of the Declaration of Independence." *Id.* And it concluded its statement with the powerful edict that "[n]o duty rests more imperatively upon the courts than the

enforcement of those constitutional provisions intended to secure that equality of rights which is the foundation of government." *Id.* In light of the foregoing, and given Alabama's public policy, which is "to protect life, born, and unborn," Alabama Supreme Court Chief Justice Tom Parker stated:

Consider a tragic hypothetical situation of two lifeless corpses lying side-by-side. One of the corpses belongs to a baby who was born alive and then killed by having its spinal cord snipped while the other baby was killed while in the womb by an injection of Digoxin. The fact that the two corpses may be virtually indistinguishable demonstrates the doubtfulness of our nation's abortion jurisprudence. Did one of the innocent babies have a right to life, while the other did not? If so, why? Both babies were distinct human beings with a genetic makeup completely separate from their mothers; both were completely dependent upon others for nourishment and care; both were intentionally killed. The only distinction between the two lifeless bodies is the subjective value, simply based upon the location and method of their demise, that our jurisprudence of doubt affords them. It is morally indefensible to suggest that the actions taken against one child violates an inalienable right to life, while those against the other do not. Why should legal protection of an individual at a particular point in time depend entirely upon his or her subjective relationship to the killer? Such irrational protection defies logic. Recognition of a child's right to life from the earliest stages of its development would dispel the shroud of doubt from this area of jurisprudence and avoid unequal protection of the two children.

Ex parte Hicks, 153 So. 3d 53, 83 (Ala. 2014) (Parker, J., concurring specially).

As discussed above, the State of Alabama has consistently recognized that unborn children are people. It has recognized the personhood of the unborn through

statutory law, state constitutional amendments, and state supreme court decisions. It has therefore filled the hole that *Roe* left open, legally establishing the personhood of the unborn in this State.

And finally, and most importantly, an Alabama court of competent jurisdiction has, based on Alabama law, granted Baby Roe legal personhood.

Consequently, the U.S. Constitution has vested Baby Roe with specifically guaranteed constitutional rights, chief among those being the right to life. Alabama law has granted Baby Roe's personal representative, Ryan Magers, the legal authority to bring a suit on Baby Roe's behalf for the wrongful termination of his or her life. And now, the judiciary (namely, this Court) has the responsibility to "dispel the shroud of doubt from this area of jurisprudence and avoid unequal protection" of Baby Roe by granting him or her the legal right to vindicate the wrongful termination of his or her life! *Id.*

Defendant Alabama Women Center's Motion to Dismiss Plaintiff's Complaint should be **DENIED**.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the Alabama Judicial System will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

Filed and served on the date above written.

J. BRENT HELMS

J. Brent Helms (HEL032)
Attorney for Plaintiff

Exhibit A

IN THE PROBATE COURT OF MADISON COUNTY, ALABAMA

**IN RE THE ADMINISTRATION OF THE
ESTATE OF BABY ROE, DECEASED**

CASE NO.: 68141

DECREE GRANTING LETTERS OF ADMINISTRATION

On the 6 day of February, 20 19, this Court heard the Petition for Letters of Administration (the "Petition") filed by Ryan Magers (the "Petitioner") in the Estate of Baby Roe, deceased (the "Decedent"). The Court finds that:

1. The Petition is verified.
2. Jurisdiction is proper.
3. Venue is proper.
4. The Decedent died on the 12th day of February, 2017 and more than five days have passed since then.
5. The Decedent left no last will and testament and no other legal instrument relating to the disposal or distribution of his or her estate, therefore dying intestate.
6. The Decedent is a person whose estate is subject to administration in the State of Alabama.
7. As of the entry of this Decree Granting Letters of Administration (this "Decree"), no other petition for the administration of the Decedent's estate has been filed in Madison County, Alabama.
8. As of the entry of this Decree, no express opposition has been presented in contra to the Petitioner serving as the personal representative of the Decedent's estate.
9. The Petitioner is fit to be named as the personal representative of the Decedent's estate and is legally entitled to Letters of Administration.
10. The Decedent died leaving a future interest in property in Madison County, Alabama. The Decedent died owning a cause of action pursuant but not limited to Ala. Code § 6-5-390 (1979), Ala. Code § 6-5-391 (1995), and Ala. Code § 6-5-410 (2011). The award of damages in such cause of action shall vest the Decedent with personal property.

IT IS THEREFORE ORDERED, ADJUDGED, and DECREED by this Court:

1. That the Petition be, and the same is hereby ordered to be filed and recorded in the Probate Court of Madison County, Alabama.

2. That the Petitioner be, and same is hereby named "Personal Representative" of the Decedent's estate.
3. That Letters of Administration be issued to the Personal Representative, provided that the Personal Representative first file in this Court a bond in the sum of \$20,000, made payable to the Judge of Probate of Madison County, Alabama. Upon filing of the bond, the same shall be accepted, approved, and recorded and Letters of Administration shall issue forthwith. The Letters of Administration shall grant the Personal Representative all the general powers, without limitation, authorized for transactions enumerated in Ala. Code § 43-2-843 (1993), subject to the priorities stated in Ala. Code § 43-8-76 (1982).
4. That actual notice meeting the requirements of Ala. Code § 43-2-61(1) (1989) shall be given by the Personal Representative in accordance with Ala. Code § 43-2-60(1) (1989).
5. That notice by publication meeting the requirements of Ala. Code § 43-2-60(2) (1989) be given by the Personal Representative in accordance with Ala. Code § 43-2-61(2) (1989).
6. That within two months after the date of this Decree, the Personal Representative file with this Court an inventory that meets the requirements of Ala. Code § 43-2-835(a) (1993).
7. That the Personal Representative file an accounting with the Court each year on the anniversary of the issuance of Letters of Administration.
8. That the Personal Representative administer the Decedent's estate pursuant to the laws of the State of Alabama.

SO ORDERED THIS 6 day of February, 20 19.



Probate Judge
Madison County, Alabama

68641

Exhibit B

STATE OF ALABAMA

IN THE PROBATE COURT
CASE NO. 68641

COUNTY OF MADISON

LETTERS OF ADMINISTRATION

LETTERS OF ADMINISTRATION ON THE ESTATE OF BABY ROE, DECEASED, ARE HEREBY GRANTED TO

RYAN MAGERS

WHO HAS DULY QUALIFIED AND GIVEN BOND AS SUCH PERSONAL REPRESENTATIVE, AND IS AUTHORIZED TO ADMINISTER SUCH ESTATE. SUBJECT TO THE PRIORITIES STATED IN CODE OF ALABAMA (1975, AS AMENDED) 43-8-76, THE SAID PERSONAL REPRESENTATIVE ACTING PRUDENTLY FOR THE BENEFIT OF INTERESTED PERSONS, HAS ALL THE POWERS AUTHORIZED IN TRANSACTIONS UNDER CODE OF ALABAMA (1975, AS AMENDED) 43-2-843.

IT IS FURTHER ORDERED THAT THE PERSONAL REPRESENTATIVE, IN ADDITION TO THE GENERAL POWERS AND DUTIES GRANTED, SPECIFICALLY IS AUTHORIZED, WITH PRIOR COURT APPROVAL, TO ACT IN TRANSACTIONS ENUMERATED IN CODE OF ALABAMA (1975, AS AMENDED) 43-2-844.

INVENTORY DUE ON OR BEFORE 4/06/2019

ANNUAL ACCOUNTING DUE 2/06/2020

WITNESS MY HAND, AND DATED THIS 6TH DAY OF FEBRUARY, 2019.

/s/ Frank Barger
JUDGE OF PROBATE

STATE OF ALABAMA
MADISON COUNTY

I, Frank Barger, JUDGE OF PROBATE IN AND FOR SAID COUNTY AND STATE, HEREBY CERTIFY THAT THE WITHIN AND FOREGOING IS TRUE, CORRECT AND COMPLETE COPY OF THE LETTERS OF ADMINISTRATION ISSUED TO

RYAN MAGERS

AS PERSONAL REPRESENTATIVE OF THE ESTATE OF BABY ROE, DECEASED, AS SAME APPEARS OF RECORD IN MY OFFICE.

I FURTHER CERTIFY THAT THIS ATTESTATION AND CERTIFICATE IS IN DUE FORM, THAT I AM JUDGE OF SAID COURT OF PROBATE, AND AS SUCH THE PROPER OFFICER TO MAKE THIS CERTIFICATE AND ATTESTATION, THAT SAID COURT IS A COURT OF RECORD, AND THAT THE JUDGE THEREOF IS EX-OFFICIO ITS CLERK.

GIVEN UNDER MY HAND AND SEAL OF OFFICE THIS 6TH DAY OF FEBRUARY, 2019.

Frank Barger
JUDGE OF PROBATE