

When the Guardian is An Abuser

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Dari Pogach and Erica Wood, American Bar Association Commission on Law and Aging

Introduction

Courts name guardians to protect adults from abuse, neglect, or exploitation; however, in some circumstances, guardians are the perpetrators of such actions. Guardians wield immense power over adults in their care. More information is needed on the extent and consequences of abuse by professional and family/non-professional guardians. Recent government and media reports have highlighted egregious cases in which guardians have taken advantage of their positions. What can an advocate do when a guardian is a perpetrator of abuse?

In this issue brief, the generic terms “guardian” or “guardianship” refer to guardians of the person as well as guardians of the property, frequently called “conservators,” unless otherwise indicated. The term “abuse” refers to abuse, neglect, or exploitation, unless otherwise indicated.

Case Examples¹

EXAMPLE 1

Mr. G, injured at birth, receives monthly settlement and periodic lump sum payments, and has had a guardian his entire adult life. The court ordered that all Mr. G’s money be placed into a trust and a professional fiduciary appointed to handle the finances. During the 12 years of the trust, the professional fiduciary made numerous interest-free “loans” to himself, to his friends, and to his speculative business ventures. The fiduciary paid himself trustee and accounting fees, without accounting to the court. An attorney appointed to represent Mr. G subpoenaed and combed through years of bank records to uncover the fiduciary’s actions; appointed a special master to perform a forensic accounting; and brought a recovery action against the fiduciary, obtaining a judgment of over \$300,000. The fiduciary has since been charged criminally.

EXAMPLE 2

Mr. S became comatose after a serious fall. His adopted daughter, appointed as temporary guardian, withdrew \$60,000 from his personal savings account, made approximately \$20,000 in cash advances from his credit accounts, and hired a locksmith to enter Mr. S’s home and remove valuable items. When Mr. S’s biological daughter learned of the guardianship case, she informed the court that Mr. S was no longer in a coma and guardianship was unnecessary because Mr. S had previously granted her powers of attorney. Mr. S’s adopted daughter claimed the powers of attorney were the product of undue influence. The court appointed an attorney for Mr. S who confirmed the biological daughter’s claims, and filed a petition to remove the adopted daughter as guardian and recover the money she stole. The adopted daughter is currently being investigated for criminal fraud.

¹ Case examples from Legal Aid Center of Southern Nevada.

EXAMPLE 3

Ms. H, 87, has advanced Alzheimer's. Her son is guardian, and related to the court his belief that her estate had been plundered by her former guardians—her daughter and nephew. The court appointed an attorney to represent Ms. H, who discovered that the nephew had stolen \$100,000. Her daughter had coerced her mother to sign over ownership of 40 acres of valuable land, had stolen an heirloom diamond necklace, and had forced Ms. H to sign over ownership of shares of stock. The attorney filed a recovery action, demanding the return of all of Ms. H's stolen assets. The judge ordered that the daughter return the land and assets; imposed double damages for the nephew's bad acts; and awarded Ms. H \$200,000.

EXAMPLE 4

Ms. W's private professional guardian filed a petition to resign as guardian, and a legal aid attorney was appointed to investigate the guardianship. Upon review of the accountings, it became clear that the guardian had misappropriated funds. The attorney petitioned the court for an Order to Show Cause and ultimately proved that the guardian had misappropriated funds and had breached her fiduciary duty. In addition to obtaining an order disgorging all guardianship fees and misappropriated funds, the guardian was sanctioned for two counts of civil contempt, one count for misappropriating funds and one count for breaching her fiduciary duty. The guardian is currently incarcerated.

Key Lessons

1. Court appointment of a guardian may, but does not necessarily, safeguard an adult from abuse, and in some cases the guardian may be the source of abuse.
2. Anyone working with older adults or adults with disabilities should be aware of signs of guardianship abuse.
3. If you suspect abuse by a guardian, take action. Actions may include investigating, reporting, and petitioning the court to intervene.
4. Courts can take a range of actions to investigate and address guardianship abuse.

Guardian as Safeguard Against—But Possible Source of—Abuse, Neglect, and Exploitation

Fiduciary role

Guardianship is a court appointment of a person or entity to make personal and/or property decisions for an adult whom the court finds unable to make decisions for themselves. Guardians are *fiduciaries*, which means they have a high duty of trust, care, honesty, and confidentiality. They must avoid conflicts of interest and even the appearance of a conflict. Guardians have a dual duty – to the individual in their care and to the court.

Removal of rights

Appointment of a guardian removes basic rights from the adult, and should be considered a last resort after other less restrictive options have been considered and tried. Advocates should be alert to avoid unnecessary, inappropriate, or overbroad guardianship appointments.

Statutes and standards

All states have statutes requiring guardians to submit accountings and personal status reports to court annually or for another specified period, unless the court directs otherwise.² For professional standards, see the National Guardianship Association's *Standards of Practice*.³ See also state standards for guardians and guardian certification programs.⁴

Guardians as perpetrators

While many guardians are trustworthy fiduciaries, some are the perpetrators of abuse. They use their authority to take advantage of an adult in their care. Abuse by guardians may be financial exploitation, physical abuse, emotional or psychological abuse, and/or neglect. Guardians committing abuse may be family members or other non-professionals, or professional individuals and agencies. Some states are implementing guardian criminal background checks.⁵ There are no universal background checks or mechanisms for guardianship courts to share results with each other or other relevant institutions.

Role of counsel: pre-appointment and post-appointment (for complaints & restoration)⁶

The appointment of counsel prior to appointment may allow the person alleged to need a guardian to voice concerns over a potential guardian. Counsel may also identify concerns to share with the client and discuss reporting these concerns to the court to avoid the appointment of a guardian with bad intentions. The role of counsel post-appointment is equally important in giving the person the opportunity to speak freely and with the guarantee of confidentiality. Counsel may learn of an issue and has the legal authority to report to the court. Counsel may also use evidence of abuse when submitting a complaint to the court and/or arguing for restoration.

PRACTICE TIP

Be alert to risk factors that could increase the chances of guardianship abuse:

- Guardianship appointment was contentious—family disputes and/or conflicts of interest are present.
- Individual has no local supports of family or friends.
- Individual has difficulty communicating basic needs.
- Guardian is out of state and has no regular connection with individual.
- Individual has a large estate, OR, little or no estate, garnering minimal attention.
- Individual has complex medical and mental health needs, and guardian is not equipped to address the needs.

² American Bar Association Commission on Law and Aging & Hurme, Sally, Guardianship State Statutory Chart on “Monitoring Following Guardianship Proceedings,” 2018, americanbar.org/content/dam/aba/administrative/law_aging/chartmonitoring.pdf

³ National Guardianship Association, *Standards of Practice*, guardianship.org/standards.

⁴ Hurme, Sally, Guardianship State Statutory Charts on “State Standards of Practice” (2016) and “State Guardian Certification Programs” (2018), americanbar.org/groups/law_aging/resources/guardianship_law_practice.

⁵ As a preventive measure, some states (approximately 20) require a background criminal and/or credit check on a prospective guardian. The judge retains discretion as to the appointment. See Hurme, Sally, Guardianship State Statutory Chart on “Criminal and Credit Background Checks,” 2018, americanbar.org/content/dam/aba/administrative/law_aging/chartfelonycreditcheck.pdf.

⁶ See the following state by state statutory comparisons on the American Bar Association website, americanbar.org/groups/law_aging/resources/guardianship_law_practice : ABA Commission & Hurme, Sally – “Representation and Investigation in Guardianship Proceedings,” 2018; ABA Commission, “State Statutes or Court Rules on Guardianship Complaint Process,” 2018.

- Guardian is a private agency or professional with multiple cases in several jurisdictions.
- Court is overwhelmed with cases needing guardians, makes rushed appointments, and monitoring is minimal.
- Guardian has history of criminal behavior, substance use, or alcohol problems.
- There is no bond between individual and guardian.
- Guardian has debts and/or financial pressures.

Data on the extent of guardian abuse

There is little information on the extent of guardianship abuse, but the anecdotal evidence continues to grow:

- In 2018, the U. S. Senate Special Committee on Aging found that while data is lacking, “unscrupulous guardians acting with little oversight have used guardianship proceedings to . . . obtain control of vulnerable individuals and . . . to liquidate assets and savings for their own personal benefit.”⁷
- In 2016, the U.S. Government Accountability Office found that “the extent of elder abuse by guardians nationally is unknown due to limited data,” but profiled eight cases in which guardians financially exploited or neglected older adults subject to guardianship in the prior five years.⁸
- Media accounts of guardianship abuse have shown malfeasance and criminal conduct by guardians in a growing number of states.⁹ In an unknown subset of cases, guardians are involved in fraudulent activities.¹⁰

Consequences of guardian abuse

Victims of guardian abuse may lose their savings. They may lose their homes or be forced into an institutional setting. Their health may be affected and they may experience depression. When guardian abuse is by a family member, family relationships may be irreparably damaged.

Signs of Guardianship Abuse

Lawyers and others who work with older adults should be alert to signs of elder abuse. The National Center on Elder Abuse lists [seven major types of elder abuse](#) and indicators of each type.¹¹

7 U.S. Senate Special Committee on Aging, *Ensuring Trust: Strengthening State Efforts to Overhaul the Guardianship Process and Protect Older Americans*, November 2018, p. 5.

8 U.S. Government Accountability Office, Elder Abuse: The Extent of Abuse by Guardians is Unknown, but Some Measures Exist to Help Protect Older Adults, GAO-17-33 (2016), [gao.gov/assets/690/681088.pdf](https://www.gao.gov/assets/690/681088.pdf).

9 Aviv, Rachel, “How the Elderly Lose Their Rights,” *The New Yorker*, October 9, 2017, at [newyorker.com/magazine/2017/10/09/how-the-elderly-lose-their-rights](https://www.newyorker.com/magazine/2017/10/09/how-the-elderly-lose-their-rights); John Oliver, “Last Week Tonight,” June 5, 2018, at [youtube.com/watch?v=nG2pEffLEJo](https://www.youtube.com/watch?v=nG2pEffLEJo); Susan Garland, “Calls for Court Reform as Legal Guardians Abuse Older Adults,” *New York Times*, July 28, 2017, [nytimes.com/2017/07/28/business/calls-for-court-reform-as-legal-guardians-abuse-older-adults.html](https://www.nytimes.com/2017/07/28/business/calls-for-court-reform-as-legal-guardians-abuse-older-adults.html); National Center for State Courts et al, *Background Brief -- Examples of Conservator Exploitation: An Overview*, 2018, at eldersandcourts.org/data/assets/pdf_file/0017/5822/ovc-brief-1.pdf. Also see National Association to Stop Guardian Abuse, nasga-stopguardianabuse.blogspot.com/2019/01/the-negative-effects-of-elderspeak.html.

10 See Aviv, Rachel, note 9 above.

11 National Center on Elder Abuse, ncea.acl.gov/elder-abuse#gsc.tab=0.

Building on the checklist of elder abuse signs, here are additional signs that are specific to abuse in the context of guardianship:¹²

Checklist of Signs of Abuse by Guardians:

- ✓ Fails to file timely accountings and reports with court
- ✓ Fails to file receipts with accounting
- ✓ Makes multiple unexplained ATM transactions
- ✓ Has no automated record-keeping
- ✓ Attorneys representing guardian withdraw
- ✓ Fails to pay rent or nursing home/assisted living bills, putting the person at risk of eviction
- ✓ Guardian is the representative payee and fails to use benefits for person's needs
- ✓ Fails to apply for public benefits for which individual may be eligible
- ✓ Makes large expenditures not appropriate to person's setting
- ✓ Requests fees higher than normal and not well substantiated; guardian drains estate and then seeks to resign
- ✓ Makes sudden changes in the person's residence, selling a home and/or moving the individual out of state with no stated rationale
- ✓ Hires friends, family, or business associates to provide services
- ✓ Isolates the person; fails to respond to requests from friends, family, or service providers¹³

Responding to Guardianship Abuse

The existence of court supervision does not ensure that someone is safe from abuse by a guardian. However, you may be able to prompt court intervention by informing the court of possible abuse and petitioning for court action.

Courts vary greatly in how they respond to complaints or allegations of abuse by guardians. Some welcome such reports to enhance monitoring as additional “eyes and ears” in the community. A few states and some courts have complaint procedures.¹⁴ Some courts may not be aware of the range of options available to them, particularly if they are not probate courts. Many of the following options are applicable both to advocates and the court.

12 The list draws on several resources including: Idaho Supreme Court, Differentiated Case Management Tool; R. Vanderheiden, “How to Spot a Guardianship Going Bad,” 2002, which was posted on the Maricopa County Arizona Public Fiduciary website, and shown in Karp, Naomi & Wood, Erica, *Guarding the Guardians: Promising Practices for Court Monitoring*, AARP Public Policy Institute, 2007, assets.aarp.org/rgcenter/il/2007_21_guardians.pdf.

13 A growing number of states have passed laws prohibiting guardians from isolating individuals or mandating that guardians support individuals to continue relationships with friends and family. See Legislative Fact Sheet: Guardianship and the Right to Visitation, Interaction, and Communication in Guardianship, American Bar Association Commission on Law and Aging, available at americanbar.org/content/dam/aba/administrative/law_aging/2018-05-24-visitation-legislative-factsheet.authcheckdam.pdf.

14 For example, in Idaho, the court has a standardized form prompting review of the complaint and determination of any court action. Idaho Supreme Court, “Guardian or Conservator Complaint Procedures,” pursuant to Id. Code title 15, Chapter 5. Also see guardian grievance procedure in the Uniform Guardianship, Conservatorship and Other Protective Arrangements Act, Sec. 127, uniformlaws.org/committees/community-home?CommunityKey=2eba8654-8871-4905-ad38-aabbd573911c.

First, Make Inquires. Spotting signs of guardianship abuse should prompt additional observation and inquiries. If you have access to the person or the person's family, friends, or service providers, find out:

- How often does the guardian visit?
- Does the person know and trust the guardian?
- Does the person have connections with others?
- Is the guardian paying the bills?
- Is the person's medical and personal care sufficient?
- Are there transactions that "just don't add up?"

Follow up with investigation of documents and accounts. Reviewing court documents will help you and/or the court assess the guardian's conduct. In some states, if you were originally named in the petition (for example, as a family member), you may receive or be entitled to request notices of court actions, and to a copy of the guardian's report and/or accounting. In some states, guardianship documents are sealed or partially sealed, except for parties to the case. If you have access, carefully examine the following documents. If you do not have access, petitioning the court to review these documents may reveal cause for an investigation or further court action:¹⁵

- The *court order*, setting out the guardian's duties and powers. Make sure the person claiming to be the guardian or conservator is actually named in the order. Determine if the guardian's authority is for personal and health decisions only, for property decisions only (often called a "conservator"), or both. Determine whether the order is limited to only certain powers. You may find the guardian is exceeding his or her authority, or "overreaching."
- The guardian's *care plan*, if one is required. Did the guardian do what the plan specified?
- The *conservator's inventory*. Is there money or property now missing?
- *Proof of bond* for a conservator. Did the conservator secure a bond, and was it approved by court?
- The *conservator's annual accountings*. Is there evidence of questionable expenditures or transactions?
- The *guardian's annual report*. Is the guardian attending to the person's health and personal needs?

To further the investigation, the court may also:¹⁶

- » Appoint a guardian ad litem, investigator, or visitor. Most state laws allow the court to appoint an investigator, visitor, or guardian ad litem to investigate problems.¹⁷ Even without explicit statutory authority, the court has discretion to do so when appropriate.
- » Order an audit/accounting. A court can audit an individual's assets. It could also order a forensic accounting by a certified public accountant – a complete assessment by a neutral party of where an individual's assets come from, and how, when, and to whom they were dispersed.

15 For more information about court monitoring practices, see National Center for State Courts et. al, Background Brief - Detecting Exploitation by Conservators: Court Monitoring, 2018, [ojp.gov/ncjrs/virtual-library/abstracts/detecting-exploitation-conservators-court-monitoring](https://www.ojp.gov/ncjrs/virtual-library/abstracts/detecting-exploitation-conservators-court-monitoring).

16 See ABA Commission on Law Aging's statutory state by state comparison of Monitoring Following Guardianship Proceedings (2018), americanbar.org/content/dam/aba/administrative/law_aging/chartmonitoring.pdf.

17 American Bar Association Commission on Law and Aging & Hurme, Sally, Guardianship State Statutory Chart on "Representation and Investigation of Guardianship Proceedings," 2018; and ABA Commission, "Guardian Ad Litem Charts," 2018, americanbar.org/groups/law_aging/resources/guardianship_law_practice.

- » Report to Adult Protective Services. All states have statutes that require the reporting of elder abuse or abuse of vulnerable adults.¹⁸ Lawyers and other professionals need to assess their reporting obligations and ethical duties in determining whether to report to APS. Factors to consider are whether the individual (in this case the individual subject to guardianship) is covered by the statute, whether you are a mandated reporter under state law, whether reporting would be in the person's best interest, and what the person wants.

While there is no data, anecdotally we know that in practice some APS agencies don't pursue cases if a guardianship is in place. They may file for guardianship and close a case of suspected abuse when the court appoints a guardian – or fail to open new cases when there is an existing guardianship order. Nonetheless, if it seems appropriate, seek to file a report with APS against a guardian regardless of past practices.

Courts may also report to APS. At least one state has developed a memorandum of understanding between adult protective services and the court to facilitate the sharing of information when the person is at risk of abuse.¹⁹

Report to Law Enforcement. A guardian's breach of fiduciary duty may violate local, state, or federal laws relevant to: elder abuse, embezzlement, false instrument, financial exploitation, forgery, fraud (e.g., credit card, tax, Medicaid), larceny, money laundering, neglect, theft.²⁰ If guardian abuse violates federal law, report to the Assistant U.S. Attorney serving as the Elder Justice Coordinator for the district.²¹

There is little information on how often judges refer matters for criminal prosecution. Judges may be reluctant or may not be able to refer cases for several reasons:

1. Guardian abuse, particularly if committed by a family member, is all too often perceived by the court, as well as by law enforcement officers and prosecutors, as a personal or civil legal matter, rather than as a crime;
2. Many courts lack an institutional mechanism to refer a victim to a law enforcement agency or prosecutor's office; and
3. Judges may face ethical considerations that prevent them from referring a case to law enforcement.

Even if a judge refers victims to the appropriate local agency for prosecution or suggests that the victim or concerned others file a complaint, these agencies may be reluctant to handle such complaints due to a lack of institutional knowledge and resources.

Report to Professional Licensing Boards. A growing number of states require specified professional guardians to be certified, licensed, or registered.²² If you identify guardian abuse, contact the state's licensing/certification board, which will investigate and may revoke the license or certification. These state boards often require that a complaint be made first to the local court. The Center for Guardianship Certification (CGC) is a national guardian certification program. It has a process for filing complaints, and may deny, suspend or revoke a certification or impose other disciplinary action.²³

18 Mandatory Reporting Laws, Stetson Law (2016), stetson.edu/law/academics/elder/home/media/Mandatory-reporting-Statutes-for-elder-abuse-2016.pdf

19 "Memorandum of Understanding between the Court Visitor Program of the Administrative Office of the Courts and Adult Protective Services, Division of Aging and Adult Services, Utah Department of Human Services, regarding the use of APS reports in Court Visitor reports," 2018.

20 Stiegel, Lori, *Legal Issues Related to Elder Abuse: A Desk Guide for Law Enforcement*, American Bar Association Commission on Law and Aging, pp. 32 (2014), americanbar.org/groups/law_aging/resources/elder_abuse/legal_issues_related_to_elder_abuse_guides

21 Elder Abuse Prevention and Prosecution Act, S. 178, 2017, Sec. 101.

22 Hurme, Sally, "State Guardianship Certification Chart," ABA Commission on Law and Aging, americanbar.org/content/dam/aba/administrative/law_aging/2017-chrt-st-guard-cert.pdf.

23 Center for Guardianship Certification, guardianshipcert.org/make-a-complaint.

If the guardian is an attorney, contact the state lawyer disciplinary committee.²⁴

Report to Federal Agency. An unknown number of guardians and conservators also serve as Social Security representative payees to receive and manage SSA benefits, or VA fiduciaries to receive and manage VA benefits, for beneficiaries the agency determines are unable to manage their own benefits. If you suspect that a guardian/conservator who is also a payee is misusing benefits, contact:

- [The SSA Office of the Inspector General Fraud Hotline](#)
- [The VA Office of the Inspector General Hotline](#)

While there is no direct line of communication between state courts and federal agencies such as the Social Security Administration, a judge may be able to alert a local official or an investigatory body. For example, the [National Disability Rights Network \(NDRN\)](#) is responsible for monitoring representative payee programs all over the country.²⁵

Actions Only the Court Can Take to Remedy Guardianship Abuse²⁶

The court may not be aware of the available options to remedy and/or prevent further abuse. Consider petitioning the court to carry out or order one or more of the following actions. You may need to provide the court with the citations for its statutory authority, case examples, or other practical justification:

- **Freeze assets/restrict accounts.** Courts can freeze assets and suspend the guardian's access, while maintaining payment of the victim's living expenses.
- **Order repayment for lost assets.** Courts can order repayment, but in some cases the guardian will have already spent all the funds, and the only way to recover them is through a bond.
- **Order repayment for lost property.** Courts can void a deed or set aside a contract.
- **Adjust bond/order repayment under bond.**²⁷ Without a judicial protocol for seeking reimbursement from a bond company, judges may not know how to facilitate repayment.
- **Order case notices to parties listed in petition.** In some states, listed parties, often family members, must receive notices of key changes in the individual's condition or circumstances, or copies of the guardian report and accountings. Order a specific protective action by guardian.
- **Enforce a statutory right to communication and visitation.** Abusive guardians may use tactics of isolation. A growing number of states have passed legislation setting out the rights of individuals subject to guardianship to interaction with others of their choosing, and limiting the powers of the guardian to restrict communication and visitation.²⁸
- **Communicate with courts in other states.** If guardian malfeasance involves more than one state, courts should follow the Uniform Adult Guardianship and Protective Proceedings Jurisdiction Act,²⁹ and communicate with any relevant court in another state. Fine the guardian.

²⁴ hirealawyer.findlaw.com/choosing-the-right-lawyer/researching-attorney-discipline.html.

²⁵ ndrn.org

²⁶ National Center for State Courts et. al, *Background Brief – Court Actions Upon Detection of Exploitation*, 2018, eldersandcourts.org/data/assets/pdf_file/0020/5852/ovc-brief-5.pdf.

²⁷ *National Probate Court Standards* and many states require bonding of assets. Except in unusual circumstances, probate courts should require for all conservators to post a surety bond in an amount equal to the liquid assets and annual income of the estate." Standard 3.3.15.

²⁸ Pogach, Dari, *Legislative Fact Sheet: Guardianship and the Right to Visitation, Communication, and Interaction*, American Bar Association Commission on Law and Aging, 2018, americanbar.org/content/dam/aba/administrative/law_aging/2018-05-24-visitation-legislative-factsheet.pdf.

²⁹ Uniform Law Commission, *Uniform Adult Guardianship and Protective Proceedings Jurisdiction Act*, 2007, uniformlaws.org/committees/community-home?CommunityKey=0f25ccb8-43ce-4df5-a856-e6585698197a

- **Appoint a co-guardian.**
- **Remove the guardian.** While this may seem like an obvious choice, courts may be hesitant to remove guardians without an identified willing and able replacement. You may be able to make suggestions to the court of another option.
- **Terminate the guardianship.** There may be new options, or changed circumstances that address the reasons the guardian was appointed, and a successor guardian is no longer needed.
- **Apply civil legal remedies for elder abuse.** Many civil actions may apply to an abusive guardian, depending on state law, but all have various challenges as remedies for elder abuse, and as used specifically against guardians. Some states have a statutory action for breach of fiduciary duty. In addition, determine if any of the following are appropriate and could help to prompt court action: breach of contract, voiding documents due to fraud or undue influence, constructive trusts, conversion, fraud, rescission, restitution, and in a few jurisdictions, a private right of action for elder abuse.

Additional Resources

- National Center for State Courts, in partnership with the American Bar Association Commission on Law and Aging, Virginia Tech Center for Gerontology, and Minnesota Judicial Branch: [Financial Exploitation by Conservators, A Series of Eight Background Briefs](#), 2018
- American Bar Association Commission on Law and Aging: [Guardianships Statutory Charts](#)
- [Center for Elders and the Courts: National Center for State Courts](#)
- Legal Aid Center of Southern Nevada Guardianship Advocacy Program: [Representing the Elderly and Adults with Disabilities Who Are Facing or Under Guardianship](#), 2018
- National Guardianship Association: [Standards of Practice](#)
- [National Guardianship Network](#)
- U.S. Senate Special Committee on Aging: [Ensuring Trust: Strengthening State Efforts to Overhaul the Guardianship Process and Protect Older Americans](#), 2018

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Case consultation assistance is available for attorneys and professionals seeking more information to help older adults. Contact NCLER at ConsultNCLER@acl.hhs.gov.
