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IN THE COURT OF APPEALS OF NORTH CAROLINA

No. COA24-622

Filed 5 February 2025

Mecklenburg County, No. 22 JT 000190-590

IN THE MATTER OF L.-A.S.N.-C.

Appeal by Respondent-Appellant Mother from order entered 16 April 2024 by Judge Aretha V. Blake in Mecklenburg County District Court. Heard in the Court of Appeals 14 January 2025.

Mecklenburg County Attorney's Office, by Senior Associate Attorney Kristina A. Graham, for Mecklenburg County Department of Social Services Youth and Family Services Division.

Ed Eldred for Respondent-Appellant Mother.

Administrative Office of the Courts, by Matthew D. Wunsche, for guardian ad litem.

GRIFFIN, Judge.

Respondent Mother appeals from the trial court's order terminating her parental rights in Liz.¹ Liz's father is not a party to this appeal. Pursuant to Rule 3.1(e) of the North Carolina Rules of Appellate Procedure, counsel for Mother filed a

¹ We use a pseudonym for ease of reading and to protect the identity of the juvenile pursuant to Rule 42(b) of the North Carolina Rules of Appellate Procedure.

no-merit brief with this Court in which he identifies one potentially meritorious issue. After conducting a thorough and independent review of the record, we find no meritorious issues and hold the trial court did not err in terminating Mother's parental rights to Liz.

I. Facts

Liz was born on 25 November 2020 and lived with both of her parents in Charlotte. On 29 March 2022, law enforcement responded to a domestic violence disturbance at the family's apartment. While at the apartment, Mother exited the house carrying Liz in her arms and stating that a fire had started inside. Investigators discovered the fire started after someone laid a methamphetamine pipe on a bed. Liz was in her pack-and-play beside the bed and suffered first, second, and third degree burns on approximately 25% of her body.

Following her discharge from the hospital, Mecklenburg County Department of Social Services Youth and Family division filed a juvenile petition alleging Liz to be neglected and dependent on 3 May 2022. The trial court entered an adjudication and dispositional order on 27 July 2023 in which it adjudicated Liz neglected and dependent. On 13 September 2023, DSS moved to terminate both the father and Mother's parental rights. On 16 April 2024, after a hearing on the matter, the trial court entered an order terminating Mother's parental rights. Mother timely appeals.

II. Analysis

Mother's Counsel filed a no-merit brief pursuant to Rule 3.1(e) on 18 August 2024. Counsel also advised Mother of her right to file a pro-se brief on her own behalf and provided her with documents to do so. Mother did not file a brief.

When counsel files a no-merit brief under Rule 3.1(e), this Court conducts an independent review of any issues identified in the brief. *See* N.C. R. App. P. 3.1(e). *See also In re L.E.M.*, 372 N.C. 396, 402, 831 S.E.2d 341, 345 (2019) (holding this Court erred by failing to conduct an independent review of the record upon a brief filed pursuant to Rule 3.1).

In his brief, Mother's counsel identified a single issue for our review: Whether the trial court complied with the Indian Child Welfare Act. However, counsel additionally stated this argument "is foreclosed by the Supreme Court's decision in [*In re:*] *C.C.G.*, 380 N.C. 23, 868 S.E.2d 28 (2021)."

Following review of the record, we hold there is no merit in the potential issue raised by Mother's counsel. Moreover, after conducting an independent review of the record, we find no meritorious issues.

III. Conclusion

For the aforementioned reasons, we affirm the trial court's order terminating Mother's parental rights to Liz.

AFFIRMED.

Judges STROUD and CARPENTER concur.

Report per Rule 30(e).