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Minn. R. Civ. App. P. 136.01, subd. 1(c).*

**STATE OF MINNESOTA
IN COURT OF APPEALS
A24-1464**

In the Matter of the Welfare of the Child of: B. A. K.,
F/K/A B. A. K. and M. T. S., Parents.

**Filed March 10, 2025
Affirmed
Harris, Judge**

Dodge County District Court
File No. 20-JV-24-215

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Considered and decided by Ede, Presiding Judge; Harris, Judge; and Florey, Judge.*

NONPRECEDENTIAL OPINION

HARRIS, Judge

On appeal from the involuntary termination of her parental rights, appellant argues that (1) the record does not support the district court's determination that at least one statutory ground for termination exists; (2) the district court abused its discretion by

* Retired judge of the Minnesota Court of Appeals, serving by appointment pursuant to Minn. Const. art. VI, § 10.

determining that termination of parental rights (TPR) was in the children's best interests; and (3) the district court violated appellant's due-process rights. Because the record supports the district court's findings and we discern no abuse of discretion in the district court's decision, we affirm.

FACTS

Background

Appellant B.A.K. is the mother of A.T.S., who was born in April 2022. M.T.S. is the adjudicated father of A.T.S.¹

Mother was previously subject to an involuntary termination and an involuntary transfer of parental rights for two other children, who are not subject to this action. Both of those cases involved mother's use of controlled substances, particularly using methamphetamine while pregnant. Mother has been diagnosed with post-traumatic stress disorder, anxiety, borderline personality disorder, and has a history of unaddressed mental-health needs and methamphetamine use.

In September 2021, respondent Minnesota Prairie County Alliance (the county) learned that mother was pregnant and referred her to the county's Prenatal Alcohol and Other Drugs Program. In April 2022, the county placed a 72-hour hold on the unborn child after it learned that mother had sought prenatal care at multiple facilities, had allegedly made statements that she intended to deliver the child out of state to avoid child protection, and had requested that the hospital discharge her prior to child protection involvement. A

¹ The district court also terminated M.T.S.'s parental rights, but he did not appeal.

child in need of protection or services (CHIPS) petition was filed three days after A.T.S.'s birth under Minnesota Statutes section 260C.007, subdivision 6 (8) and (16) (2022).

In June 2022, and in consultation with the guardian ad litem (GAL), the county developed an out-of-home placement plan, which was later adopted by the district court. The plan required mother to complete, among other things, all recommendations to address her chemical dependency and mental health, and to demonstrate the necessary skills to maintain long-term sobriety. In July 2022, mother entered the Dodge County Family Treatment Court and completed the program in early September 2023. Mother was reunited with A.T.S. in late October 2023, and the CHIPS matter was closed. However, mother voluntarily continued working with the county until January 2024.

Petition for Termination of Parental Rights

On March 29, 2024, the county filed a petition for termination of mother's parental rights based upon the presumption that mother was palpably unfit because her parental rights to another child were involuntarily terminated. Minn. Stat. § 260C.301, subd. 1(b)(4) (2022). The petition also alleged that mother refused or neglected to comply with her parental duties and that reasonable efforts failed to correct the conditions leading to the child's placement. *Id.*, subd. 1(b)(2), (5) (2022). The county supported its petition with the following factual allegation.

On March 27, 2024, the county received a report that mother had relapsed on methamphetamine and had been using for a week to ten days while caring for the child. The report was screened for a family assessment and was assigned to a social worker, M.M. The following evening, M.M., and another social worker, E.A., met with mother in her

home, where she admitted that she relapsed on alcohol and methamphetamine. Mother reported that she got drunk and used on March 23, 2024, when A.T.S. was with her father. She refused to provide a urinalysis sample (UA) and acknowledged that she would fail the drug test. M.M. and E.A. attempted to develop a safety plan but were unable to do so. Both social workers observed mother's mood shift throughout the discussion, going "from calm to yelling to saying 'just take him.'"

The social workers removed the child and brought him to a former foster home. E.A. then received a text message from mother that read, "You can tell my son I said goodbye. I warned everyone I'm no[t] going to make it through this again." E.A. quickly arranged for a supervised visit and later requested a welfare check on mother after learning she was not with one of her supports.

An Emergency Protective Care hearing was held on April 2, 2024. After hearing from mother, M.T.S., the GAL, and the county, the district court concluded that the county asserted a prima facie showing that endangerment existed and that A.T.S.'s health, safety, or welfare would be immediately endangered if A.T.S. was released to the care of mother based upon mother's admission to a relapse of methamphetamine, refusal to submit to chemical testing, and inability to develop a supervision plan that would ensure A.T.S.'s safety. The district court found that returning A.T.S. to mother was not in the child's best interests. The district court also determined that the county's petition asserted a prima facie case that A.T.S. is in need of protection or services and further found that it was in the best interests of A.T.S. to remain in the protective care of the county.

Trial

The matter proceeded to trial on July 12, 2024. The district court heard testimony from mother, her therapist, mother's husband, three licensed alcohol and drug counselors (LADCs), a social worker, and the GAL. The district court also received 17 exhibits.

One of the LADCs testified that mother completed a parenting capacity evaluation, and the report was received into evidence as an exhibit. The report did not recommend reunification with A.T.S. The LADC also testified that mother has a repetitive pattern of maintaining sobriety and then relapsing again, a "cycle of instability." She stated that "there is concern that if [mother is] reunified with [A.T.S.], that this [cycle] will continue. And it puts [A.T.S.] at very high risk for the development of mental health, emotional health, or behavioral issues."

The social worker testified that at the time of trial, mother was attending a chemical-dependency-relapse program. The social worker testified that she and mother had discussed her alcohol use in a couple of meetings. The social worker explained that in one meeting mother stated that she would refrain from alcohol, but in the next meeting mother "indicated [that] she's an adult and she can use alcohol if she wants to because she's not on probation and there's no court order." The social worker additionally testified that mother denied using alcohol even though her UAs were positive. The record indicates that mother failed UAs or reported relapsing on five occasions between March and June 2024.

The GAL testified about her concerns with mother's parenting capacity. The GAL explained that she had prior contacts with mother because she was the GAL in the case involving mother's two other children. Specifically, the GAL was concerned with A.T.S.

eating hair and the amount of weight he gained in the first month upon reentry into the foster care system. The GAL also explained that A.T.S. can become “very angry, very mad, very unsettled” and observed him “screaming, crying and screaming and throwing himself.” She was also concerned with mother’s decision not to have a peer recovery specialist (PRS) or sponsor even though mother herself had been a sponsor for others in the past. The GAL additionally stated: “I don’t know of any other services that would be available to this family, after the years of working with them, that she’s going to trust enough soon enough to make those changes to protect [A.T.S.]”

Mother testified to rebut the presumption of palpable unfitness. Mother described her relationship and interaction with the child, and she testified about her case plans. Mother testified about her mental health, including therapy, and medication management. She testified that she did not believe alcohol was problematic for her, unless she drank excessively. Mother testified that she only drank “[e]very great once in a while,” and denied drinking when A.T.S. was in her custody.

Following trial, the district court filed findings of fact, conclusions of law, and an order terminating mother’s parental rights. The district court noted the rebuttable presumption that a parent is palpably unfit to parent if they had a prior involuntary termination of parental rights and/or an involuntary transfer of permanent legal and physical custody. The district court determined that mother did not produce sufficient evidence to meet her burden of production to rebut the presumption that she is palpably unfit to parent. *See* Minn. Stat. § 260C.301, subd. 1(b)(4). The district court further determined that even if the presumption did not apply, clear and convincing evidence

supported the termination of mother's parental rights on the ground of palpable unfitness and on the two additional statutory grounds alleged in the petition. *See* Minn. Stat. § 260C.301, subd. 1(b)(2), (4), (5). The district court also determined that the termination of mother's parental rights was in the best interests of A.T.S. Accordingly, the district court terminated mother's parental rights to A.T.S. and granted legal custody to the county.

Mother appeals.

DECISION

Parental rights may be terminated only for “grave and weighty reasons.” *In re Welfare of M.D.O.*, 462 N.W.2d 370, 375 (Minn. 1990). “[T]ermination of parental rights is always discretionary with the juvenile court.” *In re Welfare of Child of R.D.L.*, 853 N.W.2d 127, 136 (Minn. 2014). And “[w]e give considerable deference to the district court’s decision.” *In re Welfare of Children of S.E.P.*, 744 N.W.2d 381, 385 (Minn. 2008). We will affirm the district court’s termination of parental rights if: (1) one of the statutory bases for terminating parental rights exists; (2) reasonable efforts toward reunification were made or were not required; and (3) termination is in the child’s best interests. Minn. Stat. §§ 260C.301, subds. 1(b), 7, 8, .317, subd. 1 (2022); *S.E.P.*, 744 N.W.2d at 385. In reviewing the district court’s order terminating parental rights, we review the underlying factual findings for clear error. *S.E.P.*, 744 N.W.2d at 385, 387. “A finding is clearly erroneous if it is either manifestly contrary to the weight of the evidence or not reasonably supported by the evidence as a whole.” *In re Welfare of Children of T.R.*, 750 N.W.2d 656, 660-61 (Minn. 2008) (quotation omitted). We review the district court’s decision to terminate parental rights for an abuse of discretion. *In re Welfare of Child of J.K.T.*, 814

N.W.2d 76, 87 (Minn. App. 2012). A district court abuses its discretion when it makes findings of fact that lack evidentiary support, misapplies the law, or resolves discretionary matters in a manner contrary to logic and facts on record. *Woolsey v. Woolsey*, 975 N.W.2d 502, 506 (Minn. 2022).

I. The district court did not clearly err in its determination that at least one statutory ground existed for termination.

Mother argues that the district court abused its discretion by terminating her parental rights because none of the statutory grounds to terminate are supported by this record. “Although a single statutory ground is sufficient to terminate parental rights,” *In re Welfare of A.M.C.*, 920 N.W.2d 648, 663 (Minn. App. 2018), the district court here identified three, each with ample support in the record. Because we conclude that two statutory bases were supported by the record, we decline to review the district court’s determination on the other ground. Below we address mother’s contentions that: (1) the record does not support the factual findings underlying the district court’s determination that she is palpably unfit to be a party to the parent and child relationship; and (2) the district court erred in determining that the county proved by clear and convincing evidence that reasonable efforts failed to correct the conditions leading to the child’s placement.

A. Palpably Unfit

Mother argues that the record does not support the factual findings underlying the district court’s determination that she is palpably unfit to be a party to the parent and child relationship. Thus, mother contends, the district court abused its discretion in terminating her parental rights on this ground.

Under Minnesota Statutes section 260C.301, subdivision 1(b)(4),² there is a statutory basis for terminating parental rights when the district court finds that:

a parent is palpably unfit to be a party to the parent and child relationship because of a consistent pattern of specific conduct before the child or of specific conditions directly relating to the parent and child relationship either of which are determined by the court to be of a duration or nature that renders the parent unable, for the reasonably foreseeable future, to care appropriately for the ongoing physical, mental, or emotional needs of the child.

To establish termination on the statutory basis of palpable unfitness, there must be “a consistent pattern of specific conduct or specific conditions existing at the time of the hearing that appear will continue for a prolonged, indefinite period and that are permanently detrimental to the welfare of the child.” *T.R.*, 750 N.W. 2d. at 661 (quotation omitted). When considering a petition to terminate parental rights, the district court “should rely not primarily on past history, but to a great extent upon the projected permanency of the parent’s inability to care for his or her child.” *In re Welfare of J.W.*, 807 N.W.2d 441, 446 (Minn. App. 2011) (quotation omitted). A parent’s past history, however, may be a good indicator for their foreseeable future conduct. *In re Welfare of A.D.*, 535 N.W.2d 643, 649 (Minn. 1995).

² Minnesota Statutes section 260C.301 was amended in 2024. *See* 2024 Minn. Laws ch. 80, art. 8, § 27 at 333; *see also* 2024 Minn. Laws ch. 115, art. 18, § 38 at 1743. The 2024 version of the statute was in effect at the time of the district court’s order terminating mother’s parental rights. However, the district court used the 2022 version of the statute in its order, so we cite to the 2022 version for consistency. The 2024 amendments do not materially change the substance of the applicable section, but do amend some statutory language, delete an inapposite subdivision, and renumber relevant subdivisions of the statute.

The district court ultimately determined that the county had proven by clear and convincing evidence that mother is palpably unfit to be a party to the parent and child relationship. And the district court found that mother continued to use mood-altering substances, placing [A.T.S.] at risk of harm. The district court noted that, although mother “made some progress in addressing her substance use and mental health, she continue[d] to struggle with addiction and relapsed on methamphetamine less than 6 months after custody of [A.T.S.] was returned.” For example, at trial, mother testified that she only drank “[e]very great once in a while,” but the record indicates that she failed UAs or reported relapsing on five occasions between March and June 2024. The district court found this statement particularly concerning, especially because mother was thoroughly advised to abstain from alcohol, to engage the services of a PRS, and was reminded of the slippery slope that alcohol posed to her recovery and ability to parent her child. And despite the recommendations by numerous professionals, mother had not engaged the services of a PRS and she continued to use alcohol while participating in a relapse prevention program.

The district court found that the LADCs provided credible testimony that a person recovering from substance abuse should not use alcohol because it poses a high risk of relapse by lowering inhibition and inducing cross-addiction. The district court cited testimony from the LADC who noted that mother has been involved with child protection services since 2004 in multiple counties, with a repetitive pattern of concerns. She expressed concerns about A.T.S. being in out-of-home placement for most of his young life. She further testified that allowing A.T.S. to remain in mother’s repetitive pattern of relapse and instability puts A.T.S. at a very high risk for mental, behavioral, and emotional

issues as he grows up. Additionally, the district court cited testimony from the GAL who expressed concerns about mother's inability to place the needs of A.T.S. above her own. The GAL noted that mother's relapse had a profound and serious impact on A.T.S. and opined that given her concern about mother's inability to see her alcohol use as a problem she does not believe that mother's is able to be the caregiver A.T.S. needs.

In sum, mother's failure to follow recommendations and her refusal to acknowledge that alcohol is a problem for her demonstrates palpable unfitness. *See, e.g., In re Welfare of J.D.L.*, 522 N.W.2d 364, 368 (Minn. App. 1994) (affirming determination that parent was palpably unfit, in part, because parent denied domestic abuse and had no understanding of parenting deficiencies); *In re Children of T.A.A.*, 702 N.W.2d 703, 708-09 (Minn. 2005) (affirming termination on basis of palpable unfitness because parent "refused to acknowledge her responsibility to protect her children from abuse by others"); *In re Welfare of B.C.*, 356 N.W.2d 328, 331 (Minn. App. 1984) (noting mother would not admit any parental shortcomings). Accordingly, the district court's factual findings are well supported by the record, as is its determination that the evidence established mother's palpable unfitness by clear and convincing evidence. Thus, the district court did not abuse its discretion by terminating mother's parental rights because she is palpably unfit to be a party to the parent-child relationship.³

³ Mother argues that the district court abused its discretion in finding that she failed to produce sufficient evidence to rebut the presumption that she is palpably unfit under to Minnesota Statutes section 260C.301, subdivision 1(b)(4). Because clear and convincing evidence supports the district court's decision to terminate mother's parental rights because she is palpably unfit, we need not address whether the district court abused its discretion

B. Reasonable Efforts Failed to Correct Conditions

Mother also challenges the district court's determination that the county proved by clear and convincing evidence that reasonable efforts failed to correct the conditions leading to the child's placement. A district court may terminate parental rights if "following the child's placement out of home, reasonable efforts, under the direction of the court, have failed to correct the conditions leading to the child's placement." Minn. Stat. § 260C.301, subd. 1(b)(5).

There is a presumption that reasonable efforts have failed if (1) the "child has resided out of the parental home under court order for a cumulative period of 12 months within the preceding 22 months;" (2) "the court has approved the out-of-home placement plan;" (3) the "conditions leading to the out-of-home placement have not been corrected;" and (4) "reasonable efforts have been made by the social services agency to rehabilitate the parent and reunite the family." Minn. Stat. § 260C.301, subd. 1(b)(5). The district court found that all four elements were met in this case.

First, the district court found that as of August 2, 2024, the final day of trial, A.T.S. had spent 604 days in out-of-home care (502 days in foster care and 102 days on a trial home visit). Second, the district court approved the out-of-home placement plan developed by the county and signed by mother. Third, the conditions leading to out-of-home placement were not corrected. According to the out-of-home placement plan, the

by determining another statutory basis to terminate parental rights existed under Minn. Stat. § 260C.301, subd. 1(b). *See S.E.P.*, 744 N.W.2d at 385 (holding at least one statutory basis must be proven to support termination of parental rights).

conditions that led to out-of-home placement were mother's relapse on methamphetamine and alcohol, her refusal to submit to a drug test, her significant child protection history, and A.T.S. spending over a year in foster care. The district court heard testimony from three LADCs and the GAL that there were no other services available to correct the conditions leading to the out-of-home placement. Mother's husband also testified that he could not think of any other services that had not already been offered to mother to keep her sober. The district court ultimately concluded that despite these services, the conditions leading to the out-of-home placement had not been corrected. Mother claims that the county failed to present clear and convincing evidence that reasonable efforts failed to correct the conditions leading to the termination of her parental rights. She argues that A.T.S.'s "basic needs were met" by providing food, clothing, and shelter. However, failure to provide food, clothing, and shelter were not the bases or conditions leading to A.T.S.'s out-of-home placement; it was mother's relapse on methamphetamine and alcohol. And contrary to mother's claim, she relapsed on five separate occasions, not just one time. Therefore, the district court's finding that the conditions leading to out-of-home placement has not been corrected is supported by the record.

Fourth, and finally, the district court found that the county made reasonable efforts to reunify the mother and child. Before a district court terminates parental rights, it must evaluate whether reasonable efforts were made by the county to reunify the child and the parent. Minn. Stat. § 260.012(h) (2024). In determining whether reasonable efforts were made, the district court considers whether the services provided were

- (1) selected in collaboration with the child's family and, if appropriate, the child;
- (2) tailored to the individualized needs of the child and family;
- (3) relevant to the safety, protection, and well-being of the child;
- (4) adequate to meet the individualized needs of the child and family;
- (5) culturally appropriate;
- (6) available and accessible;
- (7) consistent and timely; and
- (8) realistic under the circumstances.

Id.

The district court found that services offered to mother by the county since the child's birth included: (1) prenatal alcohol and other drug services; (2) child protection family assessment; (3) licensed foster care; (4) staff availability for chemical testing and financing to pay for it; (5) supervised visitation; (6) financial assistance with housing and other basic needs (e.g., rent, food, phone, gas cards, vehicle repairs, childcare); (7) transportation, including auto insurance; (8) referral to chemical-dependency assessment and treatment; (9) child protection case management; (10) parenting-capacity assessment; (11) development of out-of-home placement plan for reunification services; (12) meeting with the family to review progress and provide ongoing support; (13) early-childhood-development assessment and services; (14) public-health services; (15) referral to mental-health services and family treatment court; and (16) opportunities to participate in facilitated case planning conferences.

Mother raises multiple arguments challenging the district court's reasonable efforts finding. All of mother's arguments are unpersuasive.

Mother argues that the county did not select the reasonable efforts in collaboration with the family and did not tailor its services to the particularized needs of the family. The district court made multiple factual findings referencing collaboration between the county and mother. The record demonstrates that the services the county offered were heavily focused on understanding the specific circumstances of the mother and family, such as prenatal alcohol and other drug services, referrals to chemical-dependency assessments, a referral to chemical-dependency treatment, a parenting-capacity assessment, an early-childhood-development assessment and services, public-health services, referral to mental-health services, and family-treatment court.

Mother argues that the county's effort lacked relevance to the child's safety and well-being and were insensitive to the culture of individuals with disabilities. Multiple witnesses testified about how mother's repetitive pattern of relapse and instability could pose a threat to the child's safety and well-being, and the services the county proposed were relevant to addressing those concerns. And again, the record demonstrates that the county proposed multiple services designed to address mother's specific needs, helping her to manage her mental health, and improve her ability to recognize the child's developmental needs.

Lastly, mother argues that the district court's findings are clearly erroneous because the district court did not adequately address the factors relating to the reasonable efforts being adequate to meet the individualized needs of the child and family; available and accessible; consistent and timely; and realistic under the circumstances. We are not persuaded by these arguments. In its order, the district court showed careful consideration

of the family's needs and the county's efforts to offer assistance. After reviewing these reasonable-efforts factors, the district court concluded that the county made reasonable efforts to reunify the family, and those efforts were not successful. As noted above, the district court outlined the services offered to the family, including chemical-health and mental-health services, offers of transportation, and supervised visitation. And these findings are supported by the record.

In conclusion, the district court's findings were not clearly erroneous, and its determination that those efforts were reasonable is not an abuse of discretion. Thus, the district court did not abuse its discretion by terminating mother's parental rights because reasonable efforts have failed to correct the conditions leading to the child's placement.

II. The district court did not abuse its discretion by determining that there was clear and convincing evidence that termination of mother's parental rights was in the child's best interest.

Mother next argues that the district court erred by determining that termination of parental rights was in the child's best interest. If the district court finds a statutory basis to terminate parental rights, the county must still prove by clear and convincing evidence that termination is in the best interests of the child. *S.E.P.*, 744 N.W.2d at 385. We review a district court's conclusion that termination of parental rights is in a child's best interests for an abuse of discretion. *In re Welfare the Child of J.R.B.*, 805 N.W.2d 895, 905 (Minn. App. 2011), *rev. denied* (Minn. Jan. 6, 2012). We give "considerable deference to the district court's findings" because the analysis requires credibility determinations. *J.K.T.*, 814 N.W.2d at 92.

In considering a child’s best interests, the district court balances three factors: “(1) the child’s interest in preserving the parent-child relationship; (2) the parent’s interest in preserving the parent-child relationship; and (3) any competing interest of the child.” *A.M.C.*, 920 N.W.2d at 657 (quotation omitted); *see also* Minn. R. Juv. Prot. P. 58.04(c)(2)(ii) (enumerating these factors). “Competing interests include such things as a stable environment, health considerations, and the child’s preference.” *In re Welfare of Children of K.S.F.*, 823 N.W.2d 656, 668 (Minn. App. 2012) (quotation omitted). If the interests of the parent and child conflict, the child’s interests take precedence. Minn. Stat. § 260C.301, subd. 7 (2022). “[T]he best interests of the child must be the paramount consideration” in juvenile protection proceedings. *Id.* “Because the best-interests analysis involves credibility determinations and is ‘generally not susceptible to an appellate court’s global review of a record,’ we give considerable deference to the district court’s findings.” *J.K.T.*, 814 N.W.2d at 92 (quoting *In re Tanghe*, 672 N.W.2d 623, 625-26 (Minn. App. 2003)).

Mother argues that the county failed to produce clear and convincing evidence to support termination under the three best interest factors. She contends that the agency “saw to it” to sever the parent-child relationship, that she tried desperately to be the best mother she could be, and that her failure to meet the exact standards of the out-of-home placement plan is not a reason to terminate her parental rights. Her arguments are unavailing.

Here, the district court made findings under all three best-interest factors. First, the court determined that, although A.T.S. “has a relationship with [mother] . . . the evidence presented indicates he does not have a secure attachment to [mother].” Second, the court

acknowledged that mother desired to have A.T.S. returned to her care. Finally, when considering the competing interests of the child the district court emphasized that A.T.S. needed and deserved a “safe, stable, loving home with sober caregivers who can meet his needs.” It determined that mother could not fill such a role. The district court noted mother’s inability to refrain from mood-altering substances, her refusal to acknowledge the impact of her use on A.T.S.’s development, that A.T.S. had already spent the majority of his life in foster care, and that further delaying permanency and stability was not in A.T.S.’s best interests.

Because the record supports the district court’s best-interests determination and given the “considerable deference [afforded] to the district court’s findings,” *J.K.T.*, 814 N.W.2d at 92, we conclude that the district court did not abuse its discretion.

III. The district court did not violate mother’s due-process rights.

Mother argues finally that the district court violated her due-process rights by failing to adequately apply the clear and convincing burden of proof to the facts of this case. She notes that the “‘clear and convincing’ evidentiary standard in child protection matters is firmly rooted in the [s]tate and [f]ederal constitutions,” and that parents have a fundamental right to custody and companionship of their children. Because of this right, mother claims that any deprivation is subject to strict judicial scrutiny, meaning that the state bears the burden of proving that such deprivation is narrowly tailored to a compelling state interest.

These arguments are conclusory and lack analysis as mother does not explain exactly what due process she was deprived of procedurally or substantively.⁴ Mere assertions of error without supporting legal authority or legal argument are forfeited “unless prejudicial error is obvious on mere inspection.” *Scheffler v. City of Anoka*, 890 N.W.2d 437, 451 (Minn. App. 2017), *rev. denied* (Minn. Apr. 26, 2017); *see also In re E.M.B.*, 987 N.W.2d 597, 600 n.5 (Minn. App. 2023) (citing *Scheffler* in a grandparent-visitation appeal). Appellate courts decline to reach issues that are inadequately briefed. *State, Dep’t of Labor & Indus. v. Wintz Parcel Drivers, Inc.*, 558 N.W.2d 480, 480 (Minn. 1997); *see In re Commitment of Kropp*, 895 N.W.2d 657, 653 (Minn. App. 2017) (applying this aspect of *Wintz*), *rev. denied* (Minn. Jun. 20, 2017). We conclude this argument is inadequately briefed and thus decline to address this issue.

Affirmed.

⁴ To the extent that mother is challenging the sufficiency of the evidence to meet the clear-and-convincing evidence standard, our review of the district court’s decision indicates that its factual findings are not clearly erroneous, and we discern no abuse of discretion.