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NO. 67826-4-I

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION ONE

IN RE: DETENTION OF:

EVERETTE BURD,

Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

APPELLANT'S CORRECTED REPLY BRIEF

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A. INTRODUCTION TO REPLY

The order indefinitely and involuntarily committing Everette Burd should be reversed on the six independent grounds set forth in his opening brief: (1) the commitment is based on two diagnoses that are not accepted by the psychiatric community, not sufficiently specific, and overbroad—paraphilia NOS (nonconsent) and antisocial personality disorder; (2) trial counsel was ineffective in failing to seek exclusion of these diagnoses; (3) the trial court erred in excluding expert testimony pertaining to the paraphilia NOS (nonconsent) diagnosis; (4) the State failed to support each alternative means of commitment with sufficient evidence; (5) the statutory "likely" standard conflicts with the constitutionally-mandated clear and convincing evidence standard, denying Mr. Burd due process; and (6) the prosecutor committed misconduct in closing argument.

As discussed below, the State's arguments to the contrary are unavailing.

B. ARGUMENT IN REPLY

1. Mr. Burd's involuntary commitment should be reversed because it violates constitutional due process.

In his opening brief, Mr. Burd argued his indefinite commitment violates due process because it is premised on diagnoses that are not accepted by the profession, are overbroad and are imprecise. Involuntary civil commitment must be based on a valid, medically recognized mental abnormality or personality disorder to satisfy due process. Paraphilia NOS (nonconsent) and antisocial personality disorder fail to satisfy this standard. The State sets forth several unavailing arguments in response, which are dealt with in turn.

a. Appellate review is proper.

The State contends that Mr. Burd's due process argument is not sufficiently preserved because it was not raised below and thus should not be addressed by this Court. Resp. Br. at 6-11. As further explained in subsection 2 below, this Court should hold trial counsel ineffective for failing to raise the issue in the first instance. The State's arguments to the contrary are easily overcome.

Moreover, Mr. Burd challenges the constitutionality of his indefinite commitment. This due process challenge is a manifest

constitutional error, which can be raised for the first time on appeal. RAP 2.5(a)(3).

The State attempts to overcome Mr. Burd's right to review by recasting his argument as a *Frye* challenge.[1] Resp. Br. at 6-9. However, Mr. Burd does not challenge the novelty of the scientific methodology employed. Rather, he argues that his constitutional due process rights are violated when a court premises indefinite civil commitment on a medically invalid, overbroad and imprecise diagnosis. Op. Br. at 8-24. He does not challenge the methodology employed to reach the diagnoses but the use of the diagnoses to satisfy the criteria of Chapter 71.09 RCW. *Id.* In fact, Mr. Burd recognizes that at least one of the diagnoses may be relevant for certain psychiatric or social science purposes; he thus argues only that it is a constitutionally insufficient basis for indefinite commitment. *See* Op. Br. at 21 & n.7 (discussing APA's position that antisocial personality disorder is an inappropriate basis for civil commitment despite its inclusion in the DSM-IV-TR "for clinical and research purposes"). The argument here is thus distinct from that made by the petitioner in *Post. In re Det. of Post*, 145 Wn. App. 728, 755-56, 187 P.3d 803 (2008)

[1] *Frye v. United States*, 293 F. 1013 (D.C. Cir.1923).

(challenging paraphilia NOS (rape) as failing to satisfy sound science).[2] To categorize Mr. Burd's argument as a *Frye* challenge to the admissibility of evidence is over-simplistic and incorrect.

b. Contrary to the State's contention, the *Young* and *Berry* decisions do not dispose of the issues raised here.

The State next contends that Mr. Burd's due process challenge to the not-medically-recognized paraphilia NOS (nonconsent) diagnosis fails under *In re Pers. Restraint of Young*, 122 Wn.2d 1, 857 P.2d 989 (1993) and *In re Det. of Berry*, 160 Wn. App. 374, 248 P.3d 592 (2011). Resp. Br. at 13-16. But the State's argument has several shortcomings.

First, the State fails entirely to address *State v. Greene*, 139 Wn.2d 64, 984 P.2d 1024 (1999). *See* Resp. Br. at 13-16. As Mr. Burd argued, *Berry* conflicts with *Greene*, which should in turn not be followed. Op. Br. at 27 n.8; *see id.* at 26-27 (discussing *Greene*). The State's reliance on *Post*, 145 Wn. App. 728 suffers from the same flaw.

Second, in *Young*, the Court considered a general substantive due process challenge to the statute where the petitioners happened to be diagnosed with "paraphilia NOS (rape)." 122 Wn.2d at 15, 17-18,

[2] In *Post*, moreover, the petitioner apparently based his substantive argument on a single scholarly article. 145 Wn. App. at 756 n.16.

33, 42. Here, Mr. Burd does not challenge the statutory civil commitment scheme generally. Rather, he contends that premising indefinite civil commitment on a non-medically-recognized diagnosis like paraphilia NOS (nonconsent) is constitutionally insufficient, regardless of the propriety of the statute more broadly.

Next, to the extent the *Young* Court's analysis of paraphilia NOS (rape) is even relevant to Mr. Burd's constitutional challenge, that application is at least limited by the fact that the *Young* decision is twenty years old and based on a prior version of the American Psychiatric Association's (APA) Diagnostic and Statistical Manual of Mental Disorders. In *Young*, the Court evaluated the diagnosis paraphilia NOS (rape) in light of the then-applicable third revised edition of the manual, the DSM-III-R. 122 Wn.2d at 27-28. Mr. Burd's commitment trial was held in 2011, once a later version of the manual had been published. Thus, the fourth edition with text revisions, published in 2000, and not the DSM-III-R, is relevant to the Court's analysis here. *Cf.* Op. Br. at 13-15 (setting forth argument based on the particular version of the DSM at issue here, DSM-IV-TR).

In sum, *Young* and *Berry* are not dispositive of Mr. Burd's arguments.

c. The cases relied on by the State do not support its argument.

The State cites to many post-*Young* cases to argue that paraphilia NOS diagnoses have been upheld by the Supreme Court and this Court. Resp. Br. at 14 & n.2. However, in none of the cases relied on by the State did the courts consider the validity of the paraphilia NOS diagnosis at issue. *See generally* cases cited in Resp. Br. at 14 & n.2. The petitioners in those cases did not challenge the constitutionality of the diagnosis itself. Thus those cases provide no support for the State's attempt to refute Mr. Burd's constitutional challenge here.[3] The fact that the State has found at least a handful of experts to diagnose petitioners with paraphilia NOS (nonconsent) is irrelevant to the question whether that diagnosis, when used as a basis for indefinite civil commitment, satisfies due process. In fact, the sheer number of cases in which the diagnosis has been proffered suggests the validity of Mr. Burd's argument that the diagnosis is overbroad and imprecise. *See, e.g.*, Op. Br. at 15-18 (noting imprecision and overly broad categorization of diagnosis).

[3] Moreover, in at least two of the cited cases this Court refers to the diagnosis at issue only as "paraphilia." *In re Det. of Hoisington*, 123 Wn. App. 138, 143, 94 P.3d 318 (2004); *In re Det. of Aqui*, 84 Wn. App. 88, 94, 929 P.2d 436 (1996). And the *Skinner* decision is unpublished in the portion relied on by the State. *Compare* Resp. Br. at 15 n.2 (citing *In re Det. of Skinner*, 122 Wn. App. 620, 633, 94 P.3d 981 (2004)) *with* GR 14.1(a).

d. The State's contention that antisocial personality disorder is a constitutionally-sufficient diagnosis is similarly unavailing.

Basing Mr. Burd's commitment on an antisocial personality disorder diagnosis violates due process because the diagnosis is over-inclusive, is imprecise, and does not distinguish sexually violent predators from other criminals. Op. Br. at 18-24. The State contends in response that the diagnosis has been upheld in *Fyre* challenges by courts of this state and in Pennsylvania. Resp. Br. at 16-20. As noted previously, Mr. Burd's constitutional due process challenge is not controlled by *Young* and other cases discussing the admissibility of expert testimony under *Frye*. On this same basis, the State's reliance on *State v. Aguilar*, 77 Wn. App. 596, 892 P.2d 1091 (1995), and *Commonwealth v. Dengler*, 586 Pa. 54, 890 A.2d 372 (2005), is unpersuasive.

Likewise, *In re Det. of Sease* evaluates the sufficiency of the State's evidence where one of the underlying diagnoses happens to have been antisocial personality disorder, not the constitutional validity of that diagnosis. 149 Wn. App. 66, 201 P.3d 1078 (2009). It is similarly inapposite here.

e. Mr. Burd's commitment order should be reversed because it is premised on diagnoses that fail to satisfy constitutional due process standards.

The paraphilia NOS (nonconsent) diagnosis offered by the State is not medically accepted or recognized and is overbroad and imprecise. The antisocial personality disorder diagnosis applies to an inordinate number of male Americans and to the vast majority of prisoners. It is an overbroad and imprecise diagnosis. Neither diagnosis is a constitutionally sufficient basis to subject Mr. Burd to indefinite, involuntary civil commitment. His commitment order should be reversed.

2. Trial counsel was constitutionally ineffective for failing to request a *Frye* hearing and to object under ER 702.

Mr. Burd argues his trial counsel was ineffective in failing to (a) request a *Frye* hearing to evaluate the paraphilia NOS (nonconsent) diagnosis and (b) object to Dr. Tucker's antisocial personality disorder diagnosis under ER 702. The State relies on the same inapplicable case law discussed above to argue Mr. Burd cannot prove counsel acted deficiently. Resp. Br. at 10-11. However, the State's argument that trial counsel's failure to request a *Frye* hearing must have been strategic is illogical. The State argues counsel must have strategically

decided to use materials debasing Dr. Tucker's diagnosis to undermine his credibility on cross-examination. Resp. Br. at 10-11. But defense counsel would not have had to cross-examine Dr. Tucker at all with regard to these diagnoses had the appropriate objections been successfully made because the evidence would have been excluded. Moreover, the State cites no authority for the proposition that trial counsel's deficiency should be viewed as a strategic attempt to preserve credibility before the trial court. Resp. Br. at 10. To the contrary, trial counsel's well-supported objection was likely to be granted. Further, trial counsel generally makes objections, creates a record, and preserves issues for appeal. It is objectively unreasonable to fail to lodge an objection to the primary bases for the State's indefinite commitment.

Dr. Tucker's diagnosis of paraphilia NOS (nonconsent) is not enumerated in the DSM-IV-TR, is not generally accepted by the psychiatric community as a valid diagnosis, has not been recognized outside of the civil commitment context, has not been peer-reviewed for reliability, and has been shown to be unreliable. *E.g.*, Thomas K. Zander, *Civil Commitment Without Psychosis: The Law's Reliance on the Weakest Links in Psychodiagnosis*, 1 Journal of Sexual Offender Civil Commitment: Science and the Law 17, 49-50 (2005).

Moreover, the diagnosis of antisocial personality disorder did not assist in satisfying the State's obligation to differentiate "the dangerous sexual offender whose serious mental illness, abnormality, or disorder subjects him to civil commitment from the dangerous but typical recidivist convicted in an ordinary criminal case." *Kansas v. Crane*, 534 U.S. 407, 413, 122 S. Ct. 867, 151 L. Ed. 2d 856 (2002). The disorder merely describes a majority of convicted criminals and use of the diagnosis has not found general acceptance in civil commitment proceedings. While antisocial personality disorder is recognized by mental health professionals, as well as the DSM-IV-TR, as a potentially useful diagnosis for clinical or research purposes, it is not considered a valid basis for civil commitment. *See* Op. Br. at 21-22.

Consequently, any such diagnosis was inadmissible under ER 702 because it is not helpful to the trier of fact in Chapter 71.09 RCW proceedings.

Trial counsel was ineffective for failing to request the paraphilia NOS (nonconsent) diagnosis be subject to a *Frye* hearing and to object to the expert's testimony about antisocial personality disorder under ER 702. Thus, Mr. Burd has established a "reasonable probability that, but for counsel's [failure to raise his due process claim], the result of [his

civil commitment] proceeding would have been different." *Strickland v. Washington*, 466 U.S. 668, 694, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984). Reversal is required.

3. By excluding testimony from Mr. Burd's expert regarding the paraphilia NOS (nonconsent) diagnosis, the trial court violated Mr. Burd's constitutional right to present a complete defense.

Mr. Burd disagrees with the State's characterization of the excluded testimony at issue and relies primarily on the arguments set forth in his opening brief to demonstrate the trial court improperly excluded testimony from his expert regarding the debate surrounding the paraphilia NOS (nonconsent) diagnosis and Dr. Tucker's mischaracterization of it. *Compare generally* Op. Br. at 31-34 *with* Resp. Br. at 21-24. In particular, the offer of proof contradicts the State's assertion that Dr. Saleh would have testified to "atmosphere and results" that "he learned third hand from some third or fourth hand source." Resp. Br. at 23. Mr. Burd sought to introduce evidence derived from Dr. Saleh's presence at the conference at issue including that "it was . . . a conference with . . . a number of professionals who are active in this field" and materials from the conference. RP 1046, 1048. Such testimony was proper under ER 703, relevant, and critical to Mr. Burd's constitutional right to present a defense. *E.g.*, U.S.

Const. amends. VI & XIV; ER 703; *State v. Harris*, 97 Wn. App. 865, 872, 989 P.2d 553 (1999).

4. Substantial evidence does not support each of the alternative means presented to the jury.

The parties apparently agree that where the State does not elect among alternative means for commitment or provide a special verdict form, the commitment order can only stand if both mental abnormality and personality disorder findings are supported by substantial evidence. *Compare* Op. Br. at 34-40 *with* Resp. Br. at 24-27. As set forth in Mr. Burd's opening brief, the State did not present sufficient evidence of either mental abnormality (under any of the alternatives alleged) or personality disorder (again, under either of the two alternatives alleged). Op. Br. at 36-40. Accordingly, Mr. Burd's commitment should be reversed.

5. The preponderance of the evidence standard is constitutionally insufficient.

As set forth in Mr. Burd's opening brief, the "more probable than not" standard of RCW 71.09.020(7) violates due process because civil commitment requires a finding that it is "highly probable" the person will reoffend. Op. Br. at 41-45 (citing, among others, *Crane*, 534 U.S. at 413; *In re Det. of Thorell*, 149 Wn.2d 724, 735, 72 P.3d

708 (2003)). The State relies simply on *In re Det. of Brooks*, 145 Wn.2d 275, 36 P.3d 1034 (2001) and *In re Det. of Mulkins*, 157 Wn. App. 400, 237 P.3d 342 (2010) in response. Resp. Br. at 27-28. But as previously argued *Brooks* should be reexamined in light of *Crane* and *Thorell*. Op. Br. at 42-45. To the extent *Mulkins* holds otherwise, it should not be followed. *See* Op. Br. at 43 n.11.

6. This Court should review the State's flagrant and ill-intentioned race-based misconduct and reverse Mr. Burd's commitment.

As explained in Mr. Burd's opening brief, the State intentionally and improperly appealed to the jury's racial prejudices by arguing during rebuttal that "white women satisfy [Mr. Burd's] predator." Op. Br. at 46-49 (quoting RP 1480). Such flagrant and ill-intentioned injection of racial bias, prompting the jury to commit Mr. Burd on prejudice rather than satisfaction of the State's burden, requires reversal of the commitment order. *See id.* In response, the State argues (a) the error should not be reviewed, (b) the prosecutor's racially-infused comments were a fair response to the evidence that the jury did not receive and (c) the Court should look to evidence that was never presented to the jury in reviewing the claim of misconduct. Mr. Burd responds to each argument in turn.

a. Appellate review is proper.

Contrary to the State's contention in response, the error is reviewable on two grounds. *See* Resp. Br. at 29-30 (claiming error not preserved). First, the misconduct can be raised for the first time on appeal because the prosecutor's argument was so "'flagrant and ill intentioned' that it cause[d] enduring and resulting prejudice that a curative instruction could not have remedied." *State v. Boehning*, 127 Wn. App. 511, 518, 111 P.3d 899 (2005) (quoting *State v. Russell*, 125 Wn.2d 24, 86, 882 P.2d 747 (1994)); *accord State v. Emery*, 174 Wn.2d 741, 278 P.3d 653, 666 & n.14 (2012). Second, "when[, as here,] a prosecutor flagrantly or apparently intentionally appeals to racial bias" the commitment must be vacated unless the State can show beyond a reasonable doubt that the misconduct did not affect the jury's verdict. *State v. Monday*, 171 Wn.2d 667, 680, 257 P.3d 551 (2011); Const. art. I, § 22.

b. The first time the jury heard clearly that white women satisfy Mr. Burd's predator was from the prosecutor in her rebuttal closing argument.

The State further argues that even if this Court reviews the prosecutorial misconduct claim, it should find the prosecutor's comments in rebuttal were a fair response to the evidence at trial.

However, in making its response, the State asks the Court to disregard the verbatim report of proceedings as well as an audio exhibit played for the jury and to rely instead on a transcript created by the State after the evidence was played for the jury and which was never provided to the jury. The Court should review the evidence that was available to the jury.

Exhibit 78 A through C contains an audio recording of an interview between Mr. Burd and the State's expert, Douglas Tucker. The State chose to publish to the jury only the audio of the interview, even though the State was aware the listening quality was poor. RP 443-48 (jury had trouble hearing interview). At the time the State played the audio exhibit for the jury, the trial court inquired whether the State would like the jury to read along with a transcript of the interview. RP 446-448. The State did not have a transcript of Exhibit 78 prepared, and it accordingly declined to provide one for the jury's use at trial. RP 447. Consequently, the only evidence provided to the jury of Mr. Burd's interview with Douglas Tucker was Exhibit 78 played in open court. On appeal, the court reporter transcribed the exhibit as played for the jury. *See* RP 444-614.

The jury heard Mr. Burd state merely that he is more attracted to white women at the time of the interview. Exhibit 78B at 39:50-40:20; RP 537-38. The verbatim report reflects the following exchange between Douglas Tucker and Mr. Burd:

> Q: Were you, in, interested in white women more than black women, or other races?
>
> A: I like white women better.
>
> Q: Better?
>
> A: Yes.
>
> Q: And can you say why?
>
> A: Um, because always they, black women, don't satisfy [inaudible] they're, like prejudiced.
>
> Q: Okay. What – can you –
>
> A: And the white women look more prettier than a black one. Because I like the woman, a white woman with makeup on, uh and when a black woman wears makeup, you can't see it on them.

RP 537-38.

The prosecutor's remarks in rebuttal did not reflect the record before the jury. Instead, the prosecutor's repeated comments during closing that "white women satisfy [Mr. Burd's] predator" improperly appealed to the jury's racial prejudices. *See* RP 1480; *State v. Monday*, 171 Wn.2d 667, 676, 257 P.3d 551 (2011). The race of Mr. Burd's

hypothetical future victims was irrelevant to the elements the jury had to find to commit. The prosecutor intentionally aimed to distract the jury from its actual task—determining whether the State satisfied the elements for indefinite commitment—by placing it in fear of releasing Mr. Burd. The argument improperly sought to incite the jury's passion and ensure commitment based on fear. *State v. Mak*, 105 Wn.2d 692, 726, 718 P.2d 407 (1986).

c. Regardless of the words uttered by Mr. Burd, the prosecutor committed misconduct when she used race to secure the jury's verdict.

Curiously, the State relies neither on Exhibit 78 nor on the verbatim report of proceedings in its response brief. Resp. Br. at 28 n.3, 29 (citing exhibit 72), 32 (same). Rather, the State relies on a separately-rendered transcript of Exhibit 78. *Id.* Exhibit 72 is not evidence provided to the jury; the jury heard only the audio of the interview, which is in the record at Exhibit 78. The jury heard Exhibit 78, not the words written at Exhibit 72. Likewise, in determining whether prosecutorial misconduct reflected a response to the evidence, this Court should consider the evidence actually presented to the jury, not the State's subsequent transcript of the evidence.

Moreover, Exhibit 72 does not necessarily accurately reflect the content of Exhibit 78. The State argues the verbatim report of proceedings is a "sketchy" transcription of the interview of Mr. Burd. Resp. Br. at 28 n.3. But the State did not object to the verbatim report's transcription of Exhibit 78 or to any other portion of the filed reports. *See* RAP 9.5(c) (setting forth procedure for objecting to report of proceedings and hearing before trial court to settle issue). The State argues instead that this Court should look to its own transcript, Exhibit 72, which was never provided to the jury and the content of which Mr. Burd never had the opportunity to dispute. *See* Index to RP Volumes I-VIII (showing Exhibit 72 never admitted at trial); *cf. In re Pers. Restraint of Glasmann*, No. 84475–5, __ Wn.2d ___, 2012 WL 4944546, *4-5 (Oct. 18, 2012) (noting prosecutorial misconduct occurs where State presents jury with deliberately altered evidence during closing).

However, even assuming some of the jurors understood Mr. Burd to state the words transcribed in Exhibit 72, the State's argument that the prosecutor's racially-infused comments were proper is unpersuasive. *See* Resp. Br. at 30-33. The State primarily argues that the prosecutor's comment in closing—that "White women satisfy his

predator"—was a fair response to the evidence. *Id.*; RP 1480. Therefore, the State contends the comment was not a racially motivated remark but a fair and relevant inference. At the outset, the racially-motivated comment was not relevant. The jury was tasked to determine whether the State satisfied its burden that Mr. Burd is a sexually violent predator subject to indefinite, involuntary commitment. Whether Mr. Burd is a "predator" is thus relevant. However, the racial makeup of hypothetical victims is entirely irrelevant to whether Mr. Burd is a "predator" or whether he should be civilly committed. The State included race in its "predatory" argument to inflame the prejudices of the jury and encourage commitment on an improper basis—fear. *Cf. Glasmann*, 2012 WL 4944546, at *4 (citing to ABA standards admonishing prosecutors from using arguments calculated to inflame the passions and prejudices of jury).

Further, despite its irrelevance, the State repeated the comment—both times emphasizing that "white women" will be Mr. Burd's predatory target if the jury does not return a verdict to commit. Both instances came in rebuttal. *See Glasmann*, 2012 WL 4944546, at *6 (holding cumulative effect of repetitive misconduct so pervasive it could not have been cured by limiting instruction). First, the prosecutor

stated "don't take it from me take it from the words of Mr. Burd and that is he said, 'White women satisfy his predator.'" RP 1479-80. The prosecutor moments later reminded the jury, "white women, uh, don't satisfy – I mean, that black women don't satisfy his predator, white women do." RP 1480. She then urged the jury to find "Mr. Burd is a sexually violent predator." *Id.*

"The gravity of the violation of article I, section 22 and Sixth Amendment principles by a prosecutor's intentional appeals to racial prejudices cannot be minimized or easily rationalized as harmless." *Monday*, 171 Wn.2d at 680. Here, the improper appeal to racial bias cannot be held harmless beyond a reasonable doubt. The prosecutor's comments occurred during a very short rebuttal argument, immediately prior to the court releasing the jury to deliberate. *See* RP 1479-80. The prosecutor intentionally aimed to distract the jury from its actual task—determining whether the State satisfied the elements for indefinite commitment—by placing it in fear of releasing Mr. Burd. And rather than cleanse the argument of any racial bias, the prosecutor repeated the comment emphasizing a hypothetical harm to "white" women both times. Mr. Burd's commitment should be reversed. *See Monday*, 171 Wn.2d at 681.

F. CONCLUSION

As set forth in his opening brief and herein, Mr. Burd's commitment should be reversed on six independent grounds: (1) it is based on diagnoses that are not accepted by the psychiatric community, not sufficiently specific, and overbroad; (2) trial counsel was ineffective in failing to seek exclusion of these diagnoses; (3) the trial court erred in excluding testimony pertaining to the paraphilia NOS (nonconsent) diagnosis; (4) the commitment is supported by insufficient evidence; (5) the statutory "likely" standard conflicts with the constitutionally-mandated clear and convincing evidence standard, denying Mr. Burd due process; and (6) the prosecutor committed misconduct in closing argument.

DATED this 24th day of October, 2012.

Respectfully submitted,

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DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original of the document to which this declaration is affixed/attached, was filed in the **Court of Appeals – Division One** under **Case No. 67826-4-I**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

☒ respondent David Hackett, DPA;
King County Prosecuting Attorneys-SVP Unit

☐ appellant

☐ Attorney for other party

MARIA ARRANZA RILEY, Legal Assistant
Washington Appellate Project

Date: October 24, 2012