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DIVISION II

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STATE OF WASHINGTON

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COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON

IN RE THE DETENTION OF:

NORMAN B. ORR,

Appellant

On Appeal from the Pierce County Superior Court
Cause No. 09-2-10798-5
The Honorable James Orlando, Judge

OPENING BRIEF OF APPELLANT

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TABLE OF CONTENTS

I. SUMMARY OF THE CASE	1
II. ASSIGNMENTS OF ERROR	2
III. ISSUES PERTAINING TO THE ASSIGNMENTS OF ERROR	2
IV. STATEMENT OF THE CASE	3
A. PROCEDURAL HISTORY.....	3
B. ORR’S PRIOR SEXUAL HISTORY	4
C. TESTIMONY OF STATE’S EXPERT DR. JOHN HUPKA	6
D. TESTIMONY OF ORR’S EXPERT DR. RICHARD WOLLERT	10
E. TESTIMONY OF ORR’S LAY WITNESSES	11
V. ARGUMENT & AUTHORITIES	13
A. THE ACTUARIAL INSTRUMENT RESULTS ARE UNRELIABLE AND OVERBROAD	15
B. THE ACTUARIAL RESULTS DID NOT ESTABLISH THAT ORR IS LIKELY TO REOFFEND IF RELEASED	17
C. THE EMPIRICALLY-BASED FACTORS ARE IRRELEVANT TO WHETHER ORR IS LIKELY TO ENGAGE IN PREDATORY ACTS OF SEXUAL VIOLENCE IN THE FUTURE	18
VI. CONCLUSION	19

TABLE OF AUTHORITIES

CASES

<u>In re Detention of Audett,</u> 158 Wn.2d 712, 147 P.3d 982 (2006).....	14
<u>In re Detention of Thorell,</u> 149 Wn.2d 724, 72 P.3d 708 (2003).....	14
<u>In re Detention of Young,</u> 122 Wn.2d 1, 857 P.2d 989 (1993).....	14

OTHER AUTHORITIES

RCW 71.09.020(7).....	17, 19
RCW 71.09.020(10).....	16
RCW 71.09.020(17).....	16
RCW 71.09.020(18).....	14
U.S. Const. amd. 14	14

I. SUMMARY OF THE CASE

The State filed a petition alleging that Norman Orr is a sexually violent predator in need of civil commitment to a secure facility under the Sexually Violent Predator Act. Orr did not contest his history of sexual contact with minor children dating back to the late 1950's. Two experts presented results of actuarial instruments that predict the likelihood that a sexual offender will commit a new sexual offense if released, and found that Orr's risk to reoffend was less than 50 percent. But because the actuarial instruments do not account for Orr's advanced age of 86 years, the experts agreed that these results likely overestimated Orr's risk to reoffend. The State's expert nevertheless concluded that Orr was more likely than not to reoffend if released, basing his opinion on his own clinical judgment regarding facts that were true before Orr's 2002 incarceration, but that were not necessarily true when he evaluated Orr for trial. A jury found that Orr is a sexually violent predator because he has a mental abnormality (pedophilia) that makes him likely to engage in predatory acts of sexual violence if released. The trial court entered a civil commitment order based on the jury's verdict, and this appeal follows.

II. ASSIGNMENTS OF ERROR

1. The State's evidence is insufficient to prove that Appellant is more likely than not to commit future predatory acts of sexual violence if released from confinement.
2. The trial court erred in entering the commitment order because the evidence was insufficient to support the jury's verdict.

III. ISSUES PERTAINING TO THE ASSIGNMENTS OF ERROR

1. Did the State fail to present sufficient evidence to establish that Appellant is a sexually violent predator, where the actuarial instrument results presented by the State's expert do not properly account for Appellant's advanced age, and only predict the likelihood that an offender will commit any sexual offense rather than an act included in the more specific subset of predatory sexually violent offense?
(Assignments of Error 1 & 2)
2. Did the State fail to present sufficient evidence to establish that Appellant is a sexually violent predator, where the actuarial instrument results presented by both the State's expert and the Appellant's expert showed a less than 50 percent likelihood of committing a sexual offense in the

future? (Assignments of Error 1 & 2)

3. Did the State fail to present sufficient evidence to establish that Appellant is a sexually violent predator, where the State's expert based his clinical judgment on empirically based factors that are irrelevant because they are too remote in time and do not adequately consider current circumstances? (Assignments of Error 1 & 2)

IV. STATEMENT OF THE CASE

A. PROCEDURAL HISTORY

In 2002 Norman Orr was charged with first degree child molestation, and subsequently pleaded guilty to two counts of third degree assault. (CP 6; RP2 151) On July 1, 2009, shortly before Orr's scheduled release from confinement, the State filed a petition under RCW 71.09, seeking a civil commitment of Orr as a sexually violent predator (SVP). (CP 1-2, 6; RP2 151, RP5 595-96) The State alleged that Orr suffers from a mental abnormality, specifically pedophilia, and that this condition causes Orr to have "serious difficulty controlling his sexually violent behavior" and makes him "likely to engage in predatory acts of sexual violence unless confined to a secure facility." (CP 1-2)

A jury trial began on January 8, 2010, when Orr was nearly

87 years old. (RP5 652)¹ The jury unanimously found that Orr met the criteria of being a SVP. (RP5 753; CP 249) The trial judge entered an order of commitment on February 11, 2010. (RP2 222) Orr timely appeals. (CP 256)

B. ORR'S PRIOR SEXUAL HISTORY

Norman Orr was born on March 3, 1923. (CP 4) Orr does not dispute his history of sexual offenses. (RP2 129) Orr first acted upon his attraction towards children circa 1958, when Orr was 35 years old. (RP2 133) Orr admits to molesting his foster-son, who lived in Orr's home, beginning in the early 1960's. (RP2 134)

In 1971, Orr was arrested and charged with molesting two boys. (RP2 134) The charges were dropped when Orr agreed to participate in outpatient sex offender treatment, which he did and which he successfully completed. (RP2 134)

In 1973, when Orr was 50 years old, he was arrested and charged with Indecent Liberties Against a Child after he approached a four-year old boy and an eight-year old boy at a park, showed them his penis, and fondled their penises through their

¹ Citations to the trial transcripts, labeled Volumes 1 thru 5, will be to the volume number followed by the page number. The transcript from the show cause hearing on July 16, 2010 is not referred to in this brief.

pants. (RP2 135; CP 5) Orr pleaded guilty and received a 5-year deferred sentence, which was later revoked when he reoffended. (RP2 135-36, CP 5)

In 1974, Orr had sexual contact with three boys, ranging in age from 10 years old to 14 years old. (RP2 137; CP 5-6) Orr fondled the boys and/or requested that the boys orally copulate Orr. (RP2 137: CP 5-6) Orr's 1973 deferred sentence was revoked, and he was committed to Western State Hospital for inpatient sex offender treatment. (RP2 137-38: CP 6) Orr was confined at Western State from 1975 until 1978. (RP2 138)

On several occasions during 1982 and 1983, while Orr was 59-60 years old, he admits to having sexual contact with several boys. (RP2 141-42) In 1983 he was convicted of Indecent Liberties after he admitted to frequently touching the penis of his live-in girlfriend's 13-year old son. (RP2 141-42; CP 5) Orr served a 10-year sentence at the McNeil Island Correctional Facility, and was released in 1992, when he was 69 years old.² (RP2 145, 147)

In 2002, at the age of 79, Orr contacted the police to report

² The State relied on this incident to establish that Orr had been convicted of a sexually violent offense as that term is defined in RCW 71.09.020(17). (CP 4-5) Orr did not dispute this characterization.

that he had touched the genitals a nine-year old girl.³ (RP2 147, 148; CP 6) Orr pleaded guilty to two counts of third degree assault, and was sentenced to consecutive 60-month terms of confinement. (RP2 151; CP 6) Orr has been confined ever since. (RP2 151)

Since the early 1970s, Orr's sexual fantasies have been exclusively about children. (RP2 118) He interest is primarily in young boys. (RP2 119) When asked if he is currently attracted to children, Orr said he imagined he would be but did not know because he has been impotent since 2000. (RP2 176)

There is no record of any behavioral problems with Orr during his terms of incarceration. (RP2 146) Additionally, there is no evidence that he has engaged in pedophilic behavior while incarcerated, such as collecting photographs of children, befriending younger inmates, or other acts indicating a continued sexual interest in children. (RP 296-97)

C. TESTIMONY OF STATE'S EXPERT DR. JOHN HUPKA

Psychologist John Hupka was asked by the State to assess Orr and determine his likelihood of reoffending if released, although he is not trained to treat sex offenders and has never done so in the

³ Orr reported that he had committed several acts with this victim between 1998 2002. (RP2 147-48)

past. (RP2 79, 94, 235-36, 236-37) Dr. Hupka reviewed Orr's history, and interviewed Orr in June of 2009. (RP2 96-97; CP) Dr. Hupka concluded that Orr suffers from a mental abnormality, specifically pedophilia. (RP2 107, 108) Dr. Hupka testified that pedophilia, which involves sexual attraction to prepubescent children, is a sexual orientation that will not disappear during a person's lifetime. (RP2 108, 119-20) Dr. Hupka also opined that Orr's pedophilia makes him likely to engage in predatory acts of sexual violence if not confined. (RP2 170)

In order to assess the likelihood that Orr would reoffend, Dr. Hupka applied several actuarial instruments, the Static-99, the Static-99R, and the Static 2002. (RP2 177, 179, 194, 200) These instruments identify a number of risk factors that, when applied to a particular offender, will result in a score that predicts the likelihood that the offender will be rearrested or reconvicted of any sexual offense in the future. (RP2 182, 183-84)

However, Dr. Hupka prefaced his testimony concerning Orr's results by saying that, due to Orr's advanced age, the actuarial instruments were probably inaccurate predictors of Orr's likelihood to reoffend: the age of the offenders studied in creating the Static factors was 35-39 years old; and as an offender ages his or her

likelihood to reoffend decreases. (RP2 185, 191, 192) Dr. Hupka testified that it would be “scientifically inappropriate” to apply the actuarial data to Orr, and the actuarial results should be taken with a “grain of salt,” because there is insufficient study of elderly offenders. (RP2 193, 196; RP3 281, 282)

Nevertheless, using the Static-99 actuarial instrument, Dr. Hupka scored Orr’s risk to reoffend at 7 points, which is a “high risk” to reoffend. (RP2 195) But Orr’s score using the revised Static-99 actuarial instrument (Static-99R), which removes three points if the offender is over 60 years of age, was four points. (RP2 194-95) This score places Orr in the “moderate risk” category, and estimates a likelihood of rearrest or reoffense at 20 percent within five years, or 30 percent within 10 years. (RP2 194, 197) But Dr. Hupka also testified that the published materials associated with the Static instruments recommend that practitioners assume anyone over 70 years of age is a low risk to reoffend. (RP3 280)

Because of the unreliability of the actuarial instruments in predicting Orr’s likelihood to reoffend, Dr. Hupka based his opinion that Orr was more likely than not to engage in predatory acts of sexual violence on his clinical judgment and other empirically based risk factors, such as whether an offender has social support in the

community, whether an offender has a history of successful personal intimacy, and whether the offender has successful methods for sexual self-regulation. (RP 177, 216, 220-21; RP3 339) In Dr. Hupka's opinion, Orr has none of these factors in his favor. (RP2 220, 221, 223-24)

Dr. Hupka acknowledged that Orr has pulmonary artery disease, is hard of hearing, is impotent, and walks with a cane, but Dr. Hupka does not believe Orr's poor health or mobility would prevent him from engaging in predatory acts if he had contact with children. (RP2 228-29, 230-31; RP3 292-93, 295, 327-28) In addition, Dr. Hupka does not view Orr's advanced age as a mitigating factor, because Orr's last offense occurred when he was 79 years old. (RP RP2 227)

Dr. Hupka also noted that Orr does not have a history of sophisticated planning of offenses or of seeking out his victims; instead his victims seemed to be chosen because they were "convenient" or "handy." (RP3 308) And although Orr cannot drive, cannot travel without assistance, and will reside in an assisted care retirement facility if released, Dr. Hupka still believes that Orr is more likely than not to reoffend. (RP2 177, 230-31, RP3 327-28, 365)

D. TESTIMONY OF ORR'S EXPERT DR. RICHARD WOLLERT

Dr. Richard Wollert is a certified sex offender treatment provider, licensed to practice in the State of Washington. (RP3 342) Dr. Wollert also reviewed Orr's history and conducted an in-person interview. (RP3 347) At the time of the interview, a release plan was being created for Orr, which included residing at an assisted living facility in Yakima, adult supervision at all times, and appointment of a guardian ad litem to manage Orr's finances thereby limiting his ability to travel outside the facility. (RP3 364, 365)

Orr told Dr. Wollert that he is anxious to be released from custody because it is difficult to make friends while incarcerated, and because he wants to be able to go to church and do his own cooking. (RP3 358) Orr stated that he does not have any sexual urges towards children at the present time, and has not had an erection since 1989. (RP3 359) He said that he would keep from reoffending by avoiding children and by only leaving the retirement facility accompanied by other adults. (RP3 358)

Dr. Wollert does not believe that Orr meets the criteria of a pedophile at the present time. (RP3 373) He believes that Orr's prior offenses resulted from poor impulse control, rather than a

sexual compulsion. (RP3 373) Therefore, in Dr. Wollert's opinion, Orr does not suffer from a mental abnormality.

Dr. Wollert's assessment of Orr's likelihood to reoffend was based on actuarial instruments and not clinical approaches, because studies have shown that clinical judgments are inferior predictors of risk. (RP3 375; RP4 412, 414-16) Dr. Wollert assessed Orr using the Static-99 and Static-99R actuarial instruments. (RP3 374) Dr. Wollert found that Orr has an eight percent chance of reoffending using the Static-99, and a three percent chance of reoffending using the Static-99R. Because Orr's risk to reoffend falls well below 50 percent, Dr. Wollert determined that Orr did not meet the threshold of more likely than not to reoffend. (RP4 430-31)

E. TESTIMONY OF ORR'S LAY WITNESSES

Leanne Stelter works for the Department of Corrections (DOC), and creates release plans and assessments for inmates. (RP5 589) She worked with Orr in the months before his planned release, and determined that Orr needs to be placed in a medical assisted living facility because of the many physical tasks Orr cannot do for himself, like climb stairs or drive a car. (RP5 593, 597) Stelter did not consider Orr dangerous or mentally ill, and did

not hesitate to prepare his offender release plan. (RP5 596, 599)

David Gerlach assists inmates in their transitions back into the community after release, and Kristan Calhoun manages a geriatric care company and helps design care plans for senior citizens. (RP5 606-07, 627) They were asked to assist in finding a residential placement for Orr upon his release. (RP5 605, 607, 628) They began looking for a supported living facility because Orr has medical issues and restricted mobility. (RP5 607, 611, 629, 643-44, 646)

Calhoun found a facility that was ready to accept Orr, and was willing to make certain accommodations for him. (RP5 633, 635, 636) The facility, Cedar Hills Adult Family Home, consists of eight small houses situated around a common courtyard. (RP5 633) A maximum of six residents live in each house. (RP5 633) The grounds are surrounded by a seven or eight-foot high fence and locked gate. (RP5 633) Cedar Hills has 24-hour nursing care, and employees who provide transportation and assistance if residents need to leave the facility. (RP5 633, 634) The owner agreed to make Orr's unit a "no-child-allowed" unit, and to provide adult supervision if Orr left the facility. (RP5 636, 649-50)

Norman Orr also testified on his own behalf. Orr has a

number of medical issues and needs medical assistance due to poor circulation, plugged arteries, emphysema, trouble walking (he uses a walker for short distances but a wheelchair to travel longer distances), difficulty hearing, and problems with vision. (RP5 653-54) He testified that he would be glad to go to Cedar Hills for the remainder of his life, and wants to be released from custody so he can have the freedom to cook, and watch baseball games. (RP5 652, 656)

To ensure that he would not reoffend, Orr testified that he would stay away from children. (RP5 655-56) But Orr does not believe that he will reoffend because he is “[t]oo old” and has “no desire.” (RP5 658)

V. ARGUMENT & AUTHORITIES

Under RCW Ch. 71.09, a person convicted of a sexually violent offense may be committed to a secure facility indefinitely if they are found to be a “sexually violent predator.” To establish that a person is a sexually violent predator, the State must prove that the person: (1) has been convicted of or charged with a crime of sexual violence and; (2) suffers from a mental abnormality or personality disorder which; (3) makes the person likely to engage in predatory acts of sexual violence if not confined in a secure facility.

RCW 71.09.020(18); In re Detention of Thorell, 149 Wn.2d 724, 758-59, 72 P.3d 708 (2003). The State must show that the offender is both mentally ill and that mental illness causes the offender to be presently dangerous before a civil commitment may be ordered. In re Detention of Young, 122 Wn.2d 1, 27, 857 P.2d 989 (1993).

Due process requires the State to establish these three elements beyond a reasonable doubt. In re Detention of Audett, 158 Wn.2d 712, 727, 147 P.3d 982 (2006); U.S. Const. amd. 14. A commitment order entered pursuant to Ch. 71.09 should be reversed where no rational trier of fact, viewing the evidence in the light most favorable to the State, could find the elements beyond a reasonable doubt. Thorell, 149 Wn.2d at 744.

In this case, no rational trier of fact could have found that Orr is likely to engage in predatory acts of sexual violence if released from custody because: (A) the actuarial instrument results are unreliable in this case because they do not properly account for Orr's age and they do not predict the probability of "predatory" acts of "sexual violence"; (B) the actuarial instrument results presented by both Dr. Hupka and Dr. Wollert showed significantly less than 50 percent risk of reoffending; and (C) the empirically-based factors

relied upon by Dr. Hupka are irrelevant because they are too remote in time.

A. THE ACTUARIAL INSTRUMENT RESULTS ARE UNRELIABLE AND OVERBROAD

The actuarial instrument results should not be considered in this case because, as Dr. Hupka repeatedly testified, it would be inappropriate to apply sexual recidivism actuarial data to Orr, and the Static actuarial results are unreliable as applied to Orr, because they do not account for his advanced age of 86 years. (RP2 185, 192, 194, 196; RP3 281) The revised Static actuarial instruments recognize an age mitigator by reducing the point total once an offender reaches the age of 60, but there is no further reduction as an offender ages beyond that point. (RP2 194-95, RP3 282) And at the time of trial, Orr was nearly 27 years beyond the 60-year age threshold.

But the actuarial results are unreliable for another reason as well: they merely predict the probability of rearrest or reconviction for any sex offense, not specifically for the probability of “predatory” acts of “sexual violence.” (RP2 183-84) A “predatory” act is specifically defined as an act “directed towards: (a) strangers; (b) individuals with whom a relationship has been established or

promoted for the primary purpose of victimization; or (c) persons of casual acquaintance with whom no substantial personal relationship exists.” RCW 71.09.020(10). An act of “sexual violence” is also specifically defined, and does not include all sex crimes.⁴ RCW 71.09.020(17).

Thus, while the actuarial instruments might provide insight into whether an offender is more likely to commit any sexual offense after release including, for example, exposing oneself in public, this proves nothing about the risk that an offender in Washington would commit an offense included within the specific subset of sexual offenses that are “predatory” acts of “sexual violence,” as those terms are defined under RCW 71.09.020. The actuarial instruments were created from studies with broader recidivism criteria than are relevant to the narrow legal question in

⁴ The term “sexually violent offense” includes first degree rape, second degree rape committed by forcible compulsion, first and second degree rape of a child, first and second degree statutory rape, indecent liberties committed by forcible compulsion, indecent liberties or incest against a child under 14, first or second degree child molestation, and felony offenses in effect prior to July 1, 1990 that are comparable to sexually violent offenses. The term further includes the following crimes if sexually motivated: first or second degree murder, first or second degree assault, first or second degree assault of a child, first or second degree kidnapping, unlawful imprisonment, first degree burglary, and residential burglary. The definition also includes federal and out-of-state convictions that would constitute sexually violent offenses in Washington. The term also covers attempt, solicitation, and conspiracy to commit any of these crimes. RCW 71.09.020(17).

Washington. Accordingly, the actuarial instruments cannot establish the specific facts that the State must prove under the SVP Statute.

B. THE ACTUARIAL RESULTS DID NOT ESTABLISH THAT ORR IS LIKELY TO REOFFEND IF RELEASED

The State must prove that Orr is “[l]ikely to engage in predatory acts of sexual violence if not confined in a secure facility[,]” which means that Orr “*more probably than not* will engage in such acts” if released unconditionally from detention. RCW 71.09.020(7) (emphasis added).

Both Dr. Hupka and Dr. Wollert assessed Orr’s risk using the Static-99R actuarial instruments. (RP2 195; RP3 278, 374, 386) Dr. Hupka’s assessment showed a 20-30 percent risk of reoffending within 5-10 years. (RP2 195, 197) Dr. Wollert’s assessment showed just a three percent risk of reoffending within five years. (RP3 386)

If more probable than not means a more than 50 percent chance, then Orr’s risk is well below that standard. In fact, the actuarial instruments actually show that, more probably than not, Orr will **not** reoffend. So even if the actuarial instrument results are relevant, no rational jury could have found that Orr was likely to

reoffend based on these results.

C. THE EMPIRICALLY-BASED FACTORS ARE IRRELEVANT TO WHETHER ORR IS LIKELY TO ENGAGE IN PREDATORY ACTS OF SEXUAL VIOLENCE IN THE FUTURE

Perhaps recognizing the weakness of its actuarial proof, the State also presented Dr. Hupka's professional opinion founded on his clinical judgment and consideration of empirically-based risk factors. (RP2 216-24; RP3 339) Dr. Hupka considered several factors, including whether Orr had difficulty in the past with personal intimacy and with sexual self-regulation. (RP2 219-24)

However, given that Orr has been incarcerated since 2002, these risk factors are not reliable predictors of Orr's behavior in the present or in the future if he were released from confinement. For example, due to Orr's long period of incarceration, it is difficult to measure his current sexual self-regulation because he has not been presented with an opportunity to exercise self-regulation. But while incarcerated, Orr has exhibited no signs of deviant sexual behavior or pedophilia, and Orr reports having few or no sexual urges at the present time. (RP 296-97; RP5 658)

Dr. Hupka also considered whether Orr has social support in the community. Both Gerlach and Calhoun testified that they would provide support for Orr if he were released to reside at Cedar Hills,

which shows that Orr would have some social support if released.
(RP5 606-07, 638)

Dr. Hupka also dismissed Orr's age and health status as mitigating factors. (RP2 227, 228-29) But it is difficult to envision how, with his limited mobility, diminished vision and difficulty hearing, Orr could obtain unsupervised access to a child while residing in a supervised senior assisted living facility. Dr. Hupka suggested a scenario where a child visiting another resident might sit on Orr's lap, and Orr would use that opportunity to molest the child. (RP3 327-28) But the standard in SVP proceedings is not whether one could imagine a scenario where an offender might have the opportunity to reoffend; the test is whether, given the offender's history and current circumstances, it is more probable than not that the offender *will* commit an act of sexual violence. RCW 71.09.020(7).

Dr. Hupka's conclusion of risk based on these empirical factors is both unreliable and irrelevant as a predictor of future behavior, and is not supported by evidence in the record.

VI. CONCLUSION

No rational trier of fact could have concluded that Orr would more likely than not commit a sexually violent offense if released

from confinement. Even the actuarial instrument results, which were unreliable and overbroad, rate his likelihood to reoffend at significantly less than 50 percent. Dr. Hupka's opinion that Orr is likely to reoffend if released is not supported by the evidence and should be disregarded. Considering Orr's advanced age and declining health and mobility, it is impossible to conclude Orr is a sexually violent predator who is likely to commit a new act of sexual violence if released to an assisted living facility. The order of commitment entered in this case should be vacated, and Orr should be released to live the remainder of his life in an assisted living facility.

DATED: September 7, 2010



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CERTIFICATE OF MAILING

I certify that on 09/07/2010, I caused to be placed in the mails of the United States, first class postage pre-paid, a copy of this document addressed to: (1) Kristie Barham; Office of the Attorney General, 800 5th Ave Ste 2000, Seattle, WA 98104-3188; and (2) Norman B. Orr, Special Commitment Center, PO Box 88600, Steilacoom, WA 98388.



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