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NO. 91757-4

SUPREME COURT OF THE STATE OF WASHINGTON

IN RE THE WELFARE OF

K.M.M.,

MINOR CHILD.

STATE'S ANSWER TO AMICUS BRIEFS OF KING COUNTY
DEPARTMENT OF PUBLIC DEFENSE, DRS SPIEKER AND
HARRIS, ACLU ET AL, AND CENTER FOR CHILDREN &
YOUTH JUSTICE, ET AL

ROBERT W. FERGUSON
Attorney General

PETER E. KAY
Assistant Attorney General
WSBA# 24331
PO Box 2317
Tacoma, WA 98401
(253) 593-5243
OID No. 91117

JAY D. GECK
Deputy Solicitor General
WSBA# 17916
PO Box 40100
Olympia, WA 98504
(360) 753-6200

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I. INTRODUCTION

The trial court properly terminated J.M.'s parental rights because it found a complete "absence of a parent-child relationship" which "cannot now be corrected *without great harm*" to K.M.M. Amici Center for Children & Youth Justice, Mockingbird Society, and the Children and Youth Advocacy Clinic (CCYJ), at 8-10, quoting CP 107 (emphasis added). As CCYJ properly recognized, the trial court's findings constituted current parental unfitness because J.M. is incapable of providing for K.M.M.'s basic needs—nurturance, physical and mental health, and safety—and continuation of this parent-child relationship is detrimental to K.M.M.'s welfare *Id.* at 10. Moreover, the findings are supported by substantial evidence, focusing on how J.M. could not even visit K.M.M. without causing her great harm. FOF XII, XV, CP 108, 109.

In contrast, Amicus King County Department of Public Defense (DPD) argues for reversal based on misconstruing the trial record and trial court's findings and mischaracterizing the State's arguments. The trial court did not find, and the State never suggested, that a comparison of placement options determines current parental unfitness. The trial court did not find, and the State did not argue, that parental unfitness exists because K.M.M.'s current out-of-home placement is more stable or more preferable. The trial court did not consider the "child's best interest

determination” until it first made findings and applied the statute and law regarding current parental unfitness. *Compare* Findings IV through XVIII to Finding XIX. In every detail, the findings disprove DPD’s claim that the trial court conflated parental unfitness with the separate question of K.M.M.’s best interests. The findings instead meet DPD’s own statement that termination of parental rights is appropriate “where parents are unfit because they are completely incapable of providing for their child’s most basic needs.” Amicus DPD at p.10.

Finally, the amicus brief by Doctors Spieker and Harris provides information that can help the Court understand both the evidence at trial and the findings. This background information provides additional context for the evidence regarding K.M.M.’s participation in individual therapy to address the harms caused by her parents, and her then-current caretakers’ role in her individual therapy. In particular, the doctors’ amicus brief explains how attachments are initially formed for children, and how multiple attachments are common for children. That information can also help the Court address the inaccurate contentions of amicus ACLU (and the father) that K.M.M.’s participation in individual therapy undermines the substantial evidence in the record supporting the findings that J.M. received all necessary and reasonably available services. Finally, the

ACLU theory that K.M.M.'s participation in individual therapy equates to proof that J.M. was denied a service is speculation, not evidence.

II. ARGUMENT

A. **Contrary to the DPD Amicus Brief, the Court Findings Do Not Conflate Parental Fitness with the Best Interests of the Child.**

Amicus DPD strains to make this case resemble *In re the Welfare of A.B.*, 168 Wn.2d 908, 919, 232 P.3d 1104 (2010). DPD's false comparison relies on mischaracterizing the findings and arguments that have no basis in the record. The findings show the court did not consider K.M.M.'s best interests prior to addressing the threshold issue of the father's current parental unfitness. DPD's criticisms should be rejected.

1. **Termination was Based on Current Parental Unfitness, not on the Absence of a Strong Relationship Between the Parent and the Child.**

DPD's entire brief builds on an argument that "the lower courts found that the termination of a parent-child relationship was appropriate solely because the parent and child did not have a strong relationship." Amici DPD at 2. This is demonstrably false.

First, DPD ignores how this case involved a long-running dependency established in April 2009. *See* Finding IV and V, CP 106. DPD ignores how K.M.M. had been out of her parents' care since February 2009. Finding VI, CP 106. These findings of dependency and

disposition—the foundation of showing—a compelling state interest to protect K.M.M. in light of the unfitness of her biological parents. *See* RCW 13.34.180(1)(a) (requiring dependent status); (1)(b)(requiring a dispositional order); and (1)(c)(requiring six months in dependency).

Next, DPD ignores how the trial court made findings about K.M.M.'s special needs. She is the “product” of a “neglectful home environment”—where the “serious drug/alcohol issues” of her biological parents caused K.M.M. to “suffer[] from some of the emotion effects of neglect and attachment issues” as well as being “parentified as to her younger sibling.” Finding VIII, CP 106. The biological parents’ neglectful home caused K.M.M.’s “significant social, emotional and developmental delays,” “parentification issues,” and “attachment problems following removal from her parents . . .” Finding XI, CP 107. K.M.M. needed “individual therapy to address her issues and to facilitate the development of secure attachments.” *Id.* She started receiving this needed individual counseling with Ms. Staton in 2009. *Id.* Tom Sherry, the other expert therapist who testified at trial, agreed that K.M.M. needed such individual therapy to address the harms she incurred when residing with her biological parents. RP 248.

The findings also document K.M.M.’s continuing and, in some ways, increasing special needs and how J.M. was unable to meet those

needs without causing her great harm. K.M.M.'s "psyche"—her mental health—could not "tolerate or engage with visits" with her biological parents and forcing contact, let alone visits, "would be detrimental to [K.M.M.] causing great harm to her" according to "two experienced therapists." Finding XV, CP 109. The court found no way to allow further contact without causing K.M.M. to suffer great harm and to damage her future development. *Id.* See also RP 389; Ex. 14, 15, 15. The evidence for these conclusions is substantial and compelling. K.M.M. suffered great harm because of the attempt to reinitiate contact using an "incidental contact" plan with the father. In the days after the initial incidental contact, K.M.M. was trembling, very scared, engaging in baby talk, and had regressed to being a young child. RP 155, 195. She had to have emergency therapy sessions with Ms. Staton both that day, and in the days that followed. RP 155, 195. Moreover, J.M. did not understand the trauma he had caused the child. RP 330. Furthermore, he disregarded all of the parties' advance planning and preparation because he erroneously contended that he could talk and even have a lengthy visit with K.M.M. at this initial incidental contact. RP 330.

Because DPD ignores these details, there is no merit to its claim that termination was based solely on a weak parent-child relationship. The trial court's findings described the special parenting needs of K.M.M.

and how her needs originated from her biological parents' neglectful home. The findings address an ongoing need to prevent further harm to K.M.M. given her own needs and background. In short, the evidence demonstrated that J.M. was an unfit parent for K.M.M. He was unfit when the case began in 2009 when parental neglect harmed the child's psyche. He remained unfit at the time of trial because he could not even have contact with K.M.M. without causing her great harm. The trial court heard from experts that although these facts were unusual, they demonstrated how J.M. was unable to provide for K.M.M.'s basic needs.

2. The Trial Court Relied on the Father's Current Inability to Provide Basic Care for K.M.M., not K.M.M.'s Best Interests, to Find Current Parental Unfitness.

Termination of parental rights depends on unfitness to parent a child, and the best interests of the child cannot, standing alone, overcome the parent's liberty interest in retaining parental rights in the absence of current parental unfitness. But DPD asks this Court to alter the first step of the established termination analysis by distorting the criteria for establishing parental unfitness. In particular, DPD asks the Court to sidestep how parental unfitness, under statute and case law, is determined in the context of the actual child whose welfare is at issue.

Washington statutes protect both a parent's liberty interest and a child's right to a safe and healthy environment. *In re Dependency of K.D.S.*, 176 Wn.2d 644, 652, 294 P.3d 695 (2013) (citing *In re the Welfare of A.B.*, 168 Wn.2d 908, 919, 232 P.3d 1104 (2010)). Family reunification is a priority under RCW 13.34. But, so is the child's right to "basic nurture, physical and mental health, and safety" and the principle that "the rights and safety of the child should prevail." RCW 13.34.020. Throughout a dependency, and in the provision of services, "the child's health and safety shall be the paramount concern." *Id.* A parent's rights must yield, when to accord them dominance, would be to ignore the needs of the child. *In re Aschauer*, 93 Wn.2d 689, 695, 611 P.2d 1245 (1980).

To accomplish these competing goals, the "termination statute requires certain statutory factors be proved by clear, cogent, and convincing evidence before termination may be considered." *In re the Welfare of C.S.*, 168 Wn.2d 51, 55, 225 P.3d 953 (2010) citing RCW 13.34.180(1) and .190(1)(a); *In re the Dependency of K.R.*, 128 Wn.2d 129, 141-42, 904 P.2d 1132 (1995). "[S]atisfaction of the six statutory elements of subsection .180(1) is an implicit finding of unfitness, satisfying the due process requirement that a court must find parents currently unfit before terminating the parent-child relationship."

In re Dependency of K.N.J., 171 Wn.2d 568, 577, 257 P.3d 522 (2011)
(citing *K.R.*, 128 Wn.2d at 141-42).

The *A.B.* Court reversed a termination order where the findings did not demonstrate unfitness and instead relied on the child's best interest. *In re A.B.*, 168 Wn.2d at 920. This case is not *In re A.B.* Nor does *In re A.B.* control this case, because the *A.B.* decision does not hold that a parent is currently fit when that parent's presence causes significant harm to the child at issue and there is no likelihood the parent can overcome that on-going problem.

DPD's remaining arguments on this topic are immaterial. It argues that the "best interests" element can only work in a parent's favor. This is immaterial because the findings confirm that the court applied RCW 13.34.180 to a father who is unable to parent K.M.M. because he is unable to even have contact her because of the serious harm it causes K.M.M. Similarly, there is no merit to DPD's argument that the trial court assessed parent-child relations as if this were a custody dispute between the biological father and foster family. No findings examine unfitness based on anything other than the fact that the father was incapable of providing basic care for K.M.M. The actual trial court findings here do not support their characterization of the trial court findings, and DPD's strawman arguments should be ignored.

3. In Determining Current Parental Unfitness, a Trial Court Must Consider the Dependent Child and the Actual Parent-Child Relationship Before the Court.

DPD next maintains that examining the actual parent-child relationship in determining parental unfitness is too subjective and cannot protect a parent's constitutional rights. Amicus DPD at 11. DPD argues as that a parent's fitness should be examined in the abstract without considering his or her fitness to parent the *actual* dependent child before the Court. In this way, DPD asks the Court to expand *In re A.B.* and make any mention of a parent-child relationship an untouchable third rail in termination findings. That approach contradicts both the plain language of RCW 13.34.180 in determining current parental unfitness, as well as RCW 13.34.020. *See also In re K.N.J.*, 171 Wn.2d at 576.

Every element of RCW 13.34.180 concerns a parent in the context of the specific dependent child. For example, the "little likelihood" element in RCW 13.34.180(1)(e) examines the "foreseeable future," which considers the specific child and necessarily concerns the relationship between that particular child and parent. *In re Dependency of T.R.*, 108 Wn. App. 149, 164-165, 29 P.3d 1275 (2001); *In re Welfare of Hall*, 99 Wn.2d 842, 851, 664 P.2d 1245 (1983); *See also* Amici CCYJ at 12. Similarly, the element regarding continuation of the parental-child relationship harming the child's need for permanency

(RCW 13.34.180(1)(f)) addresses whether the specific parent-child relationship has a damaging and destabilizing effect on the individual child that negatively impacts her integration into permanent and stable placement. *In re Welfare of R.H.*, 176 Wn. App. 419, 428, 309 P.3d 620 (2013); *In re K.D.S.*, 176 Wn.2d at 656 (evidence supported finding that continued parent-child relationship harmed a child's well-being).

Furthermore, the obligation to provide reasonably necessary and available services, RCW 13.34.180(1)(d), focuses on the specific parent and the child at issue. Services must address the particular child and parent because “[i]n making reasonable efforts, the child’s health and safety shall be the paramount concerns.” RCW 13.34.020. Here, the trial court addressed the subject of the services and found:

[T]here is no reasonable probability that reunification therapy, or any other kind of therapy, can remedy this situation within the foreseeable future. Thus, all necessary services reasonable available, capable of reuniting [K.M.M.] with her father within the foreseeable future, have been offered or provided in this case.

Finding XIII, CP 108. Similarly, the record shows the trial court had to address whether services were possible to reunify this parent and child. But, the court found that even “[t]o attempt reunification therapy would be detrimental to [K.M.M.], causing her great harm, according to Tom Sherry and Cory Staton, two experienced therapist.” Finding XV, CP 109.

This case illustrates why DPD's claim that actual facts about the parent-child relationship at issue should be removed from the parental fitness inquiry should be rejected. As noted above, RCW 13.34.020 makes "the child's health and safety ...the paramount concern" when deciding if "reasonable efforts" on providing rehabilitative services were made. A court cannot protect a particular child's health and safety without addressing the actual parent-child relationship throughout the proceeding. In this case, that principle animates Findings XIII and XV (quoted above). CP 107-09. Those findings explain what the trial court meant by mentioning an "exception" in Finding IX:

[A]ll services reasonably available, capable of correcting the parental deficiencies within the foreseeable future have been offered or provided to the father *with the exception of reunification services which if provided are no longer capable of providing a solution.*

Finding IX, CP 107 (emphasis added).

In context, Finding IX acknowledges that there was not a service labeled "reunification services" that was capable of correcting the parental deficiencies in either the foreseeable future, or ever. This finding, however, must be read in conjunction with Findings XIII and XV, which explain what the court implied by noting this "exception." Those findings recognize that the precursor for any type of reunification service being available, and capable of correcting the parental deficiencies, was to first

implement a plan for safe incidental contact. The findings reflect that the safe incidental contacts plan was implemented, but had to be suspended after the father's noncompliance with the terms of the agreed upon plan caused great harm to K.M.M. *See* citations to record at page 5, above. Thus, these findings are not addressing a "weak" parent-child relationship as claimed by DPD. Rather, these findings show that all services reasonably available were provided and that "reunification services" labeled as an exception in Finding IX concerned a service that was not capable of correcting the father's parental deficits at any point in time, let alone in the near future, according to the evidence.

Finally, DPD expresses concern that "highly skilled professionals" will be needed to address such topics and that language and cultural barriers might affect evaluations. Even assuming this is a problem, it is not a constitutional reason to adopt DPD's approach. Every aspect of a case may depend on professionals who face language, cultural, and other challenges. The adversary process can challenge the weight or relevance of such evidence. A parent through his or her attorney can challenge the services throughout the dependency.¹

¹ The State concurs in K.M.M.'s argument that explains how the adversary process provides the best tool for responding to concerns about the quality of evidence or opinion addressing a harmful parent-child relationship. *See* K.M.M. Answer in Reply to New Issues Raise in Amicus Briefs at 9-10 (explaining how the father received clear notice that testimony would address harm and risk posed to K.M.M.).

In the end, DPD's proposal would rewrite the termination statute without a sound basis in constitutional case law. Moreover, their proposal would harm children if a trial court's determination of fitness cannot fully or fairly examine the parenting needs of a specific child, or could not examine material evidence of unfitness rooted in the relationship with a biological parent that, in this case, was demonstrably harmful to K.M.M. in a way that could not be overcome.²

4. The Trial Court Correctly Determinate that Neither a Guardianship nor Prolonging the Dependency were Reasonable Alternatives in this case.

DPD next argues that the trial court should have either continued with reunification efforts in the underlying dependency or established a guardianship for K.M.M. Amicus DPD Brief at 10-11. However, amicus again overlooks the trial court specific findings rejecting either of these alternative approaches. First, the court found that "[t]here is no evidence that a guardianship would be feasible or could be or would be engaged in here." Finding XVIII, CP 110. The father himself opposed any guardianship in his briefing to the trial court, maintaining that "[t]he court

² DPD claims that its position reflects the constitutional rights of parents, but its constitutional analysis is inadequate because it gives no consideration to competing constitutionally protected interests of children. *See* K.M.M. Answer in Reply to New Issues Raised in Amicus Brief, at 2-4. This Court should not engage in a constitutional ruling based on inadequate briefing from an amicus party.

does not need to hear anything further regarding the nonexistent option of guardianship.” CP 99.

The court instead found there was no likelihood that conditions will be remedied so that K.M.M. could be returned to the father in the near future. FOF XIV, CP 108. “Everyone has agreed and testified that there is no reasonable probability that reunification therapy, or any other kind of therapy, can remedy this situation within the foreseeable future.” FOF XIII, CP 108. These findings are supported by substantial evidence in the form of un rebutted expert testimony, as explained in prior briefing.

Second, the trial court found that continuing the dependency is not in the best interests of K.M.M. Finding XIX, CP 110. The father’s defense to this finding was simply his opinion that K.M.M. had been coached and that she should be moved to a different foster home. RP 539, 541-42. The trial court was entitled to weigh the evidence and reject that approach. Dependent children should not remain in legal limbo, with the mental and emotional strain that entails, for longer than necessary. *In re M.H.P.*, 184 Wn.2d 741, 762, 364 P.3d. 94 (2015). Here, K.M.M. continued to experience that mental and emotional strain. Both Mr. Sherry and Ms. Staton testified that fear, as a result of the uncertainty surrounding her future, was preventing K.M.M. from entering the next stage of her emotional development. RP 93, 248. The Guardian ad Litem testified that

K.M.M. feels that her life is threatened by the possibility of being returned to her biological parents. RP 665. Therefore, substantial evidence supports the trial court's finding that continuing a dependency is not in the best interests of K.M.M. Finding XIX, CP 110.

B. General Information in the Spieker/Harris Amicus Brief on Attachment Explains Why K.M.M.'s Individual Counseling to Address Her Individual Issues Was Not Evidence of a Service the Father Could Have or Should Have Received.

The amicus brief by Doctors Spieker and Harris provides basic information that is helpful to the Court in understanding both the evidence at trial and the trial court's findings. In doing so, the amicus brief helps reveal the fallacy of the father's argument regarding K.M.M.'s individual therapy to address her issues caused by her parents, and the participation of her then-current caretakers, the foster parents. For example, amicus explains how "multiple attachments are common for young children; once the initial attachment has formed, the child may go on to form second attachments" and "one attachment does not have to end in order to create another attachment." Amici Spieker/Harris at 2. Amicus notes that "[t]he only requirement for a second attachment is that the first [attachment] has occurred." Amici Spieker/Harris at 2. At page 6-8, they discuss the neurological and biological bases for concerns regarding attachment

issues, and how they relate to emotional states and form the basis for all subsequent social relations in children.

Both Mr. Sherry's and Ms. Staton's testimony about K.M.M.'s participation in individual therapy is consistent with Spieker and Harris. Ms. Staton testified that developing a secure attachment to adults would make it easier for K.M.M. to attach to her biological parents, RP 139-40, because a child can have multiple attachments. RP 142. The other expert before the court, Tom Sherry, agreed with this approach. RP 267, 268. This echoes the amicus statement that "[t]he only requirement for a second attachment is that the first has occurred." Amici Spieker/Harris at 2. The trial court also had ample evidence regarding K.M.M.'s individual therapy to address the harms she incurred while in the care of the biological parents. RP 248. The court heard how K.M.M. had to heal from this psychological harm done to her and needed to form an initial attachment in order to catch up on the emotional, social and intellectual delays caused by the parents' neglectful home environment. RP 68-70. K.M.M.'s therapy helped her learn to trust adults and to feel safe in general. RP 100. A child learning to rely on adults in general would make it easier for that child to attach to others. RP 71, 139-40. Such individual therapy is standard practice for addressing children with certain attachment issues. RP 70, 267-68, 404.

Notably, Spieker and Harris do not identify anything in this record or in the background science to support the contentions by Amicus ACLU and the father that K.M.M.'s participation in individual therapy can, by itself, undermine the trial court's finding that the father received all necessary and reasonably available services.

In their brief originally submitted in the companion *B.P.* case, Amicus ACLU apparently contends that a reviewing court should conclude that the foster parents received services via the child's individual therapy and finds that this represents a service not provided to a parent. ACLU brief at 8-11. The ACLU, like the father, asks the Court to go beyond the evidence and substitute an unwarranted finding. K.M.M.'s therapy addressed harm done to her when she was in the care of her parents. RP 248. Ms. Staton's work with K.M.M. started in 2009 to help her to heal. RP 95. The trial court, however, had evidence showing that the biological parents could not work with K.M.M. at that time. RP 138. The trial court also learned that the biological parents were not the then-daily caretakers, in contrast to the role of the foster parents, in meeting K.M.M.'s immediate needs. RP 69-70. The biological parents would become involved in the child's individual therapy when they would take on the role of meeting the child's day to day needs. RP 123, 267-68. Thus,

substantial evidence supports the court's findings on K.M.M.'s need to participate in individual therapy. FOF XI, CP 107.

In contrast, Amicus ACLU ignores the trial court record because no expert testified that K.M.M.'s individual therapy was a service that should have been provided to the father. Instead, the trial court heard from Tom Sherry and Cory Staton, who were found to be experienced therapists and credible witnesses on issues regarding the child's on-going needs and the father's inability to meet these needs. Finding XIII and XV, CP 109-10. Their testimony supported the finding that,

To attempt reunification therapy would be detrimental to [K.M.M.], causing her great harm . . . [K.M.M.] needs to begin to establish the other social and emotional stages she needs to go through, such as developing an ability for empathy.

Finding XV, CP 109. The Staton and Sherry testimony also supported the finding that "[K.M.M.]'s psyche got to the point where she would no longer tolerate or engage with visits with her biological parents." Finding XII, CP 108. Additionally, no evidence was presented that undermines the dependency court's decision to suspend visitation initially and to continue to suspend visitation based on the on-going threat to K.M.M.'s health, safety, and welfare. RP 389, Ex. 14, 15, 16.

The Court should consider the Spieker and Harris brief to confirm how the findings and the evidence in this case reflects current science.

It also confirms that it takes expert testimony—which is not in this record—before a court can accept the father’s and the ACLU’s speculation seeking to misinterpret the relevance of evidence about K.M.M.’s participation in individual therapy with Ms. Staton.

C. Amicus DPD’s Argument Regarding Visitation Ignores RCWs 13.34.138 and 13.34.020 and the State’s Compelling Interest in Protecting Children During Dependency.

DPD also claims that, “DSHS inappropriately denied visitation ... based on assumptions that [K.M.M.] would suffer emotional harms.” Amicus DPD at 15. This ignores how the record demonstrated that any on-going visitation would subject K.M.M. to further emotional harm and trauma. As explained in K.M.M.’s Answer in Reply to New Issues Raised in Amicus Briefs at 11-13, the record documents K.M.M.’s severe and traumatic response to visits and specifically during the failed attempt to pursue the incidental contact plan the parties agreed was a necessary first step to the possibility of overcoming the father’s inability to have safe contacts with K.M.M.

The State joins K.M.M.’s motion to strike the portions of the DPD briefing that would claim visitation was a necessary, but unprovided, service. Alternatively, this Court can simply decline to consider Amici’s argument. Amici’s visitation theory was rejected by the court of appeals

and was not raised to this Court in the petition for review by the father. *In re Welfare of K.M.M.*, 187 Wn. App. 545, 572-74, 349 P.3d 929 (2015).

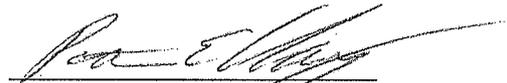
III. CONCLUSION

Current parental unfitness exists when the findings demonstrate that a parent cannot meet a child's basic needs. *In re Custody of B.M.H.*, 179 Wn.2d 224, 235-36, 315 P.3d 470 (2013). *In re Welfare of A.B. (A.B. II)*, 181 Wn. App. 45, 61, 323 P.3d 1062 (2014); RCW 13.34.020 (recognizing a child's basic rights that the State seeks to protect). Contrary to DPD's arguments, two experienced therapists provided unrebutted expert testimony regarding K.M.M.'s basic needs for safety, security and nurturance, and the father's current inability to meet those needs. Tom Sherry testified the father lacked the insight and understanding needed to overcome the barrier posed by K.M.M.'s response to her prior neglect. RP 236. The social workers agreed with this testimony. RP 236, 330, 334.

The trial court heard all of the testimony and made detailed findings. The findings made are supported by substantial evidence and the court properly applied RCW 13.34.180 to those findings. The order terminating parental rights should be affirmed.

RESPECTFULLY SUBMITTED this 13th day of May, 2016.

ROBERT W. FERGUSON
Attorney General



Peter E. Kay, WSBA# 24331
Assistant Attorney General

/s/ Jay Geck

Jay D. Geck, WSBA# 17916
Deputy Solicitor General

DECLARATION OF MAILING

I, AMANDA KAPPELMAN, declare under penalty of perjury under the laws of the state of Washington that the following is true and correct:

On May 13, 2016 I caused a true and correct copy of the State's Answer to Amicus Briefs of King County Department of Public Defense, Drs. Spieker and Harris, ACLU et al, and Center for Children & Youth Justice, et al to be served as indicated below:

Original via E-Mail to:	Washington State Supreme Court Clerk supreme@courts.wa.gov
Copy via E-mail & U.S. Mail:	Jodi R. Backlund Manek R. Mistry Skylar T. Brett Backlund & Mistry PO Box 6490 Olympia WA 98507 Eric J. Nielsen Dana M. Nelson Nielsen Broman & Koch PLLC 1908 E Madison St Seattle WA 98122 Jennifer L. Dobson Attorney at Law PO Box 15980 Seattle WA 98115
Copy via E-mail:	D'Adre Cunningham The Defender Association Division King County Department of Public Defense D'adre.cunningham@kingcounty.gov

Alena Ciecko
Society of Counsel Representing the
Accused Division
King County Department of Public
Defense
Alena.ciecko@kingcounty.gov

Kathleen McClellan
Northwest Defender Association Division
King County Department of Public
Defense
Kathleen.mcclellan@kingcounty.gov

Kelli Johnson
Associated Counsel for the Accused
Division
King County Department of Public
Defense
Kelli.johnson@kingcounty.gov

Anita Khandelwal
Director's Office
King County Department of Public
Defense
Anita.khandelwal@kingcounty.gov

Linda Lilevik
For Drs. Spieker and Harris
Carey & Lilevik
lindalilevik@careylilevik.com

Joseph A. Rehberger
Cascadia Law Group
jrehberger@cascadialaw.com

Copy via U.S. Mail:

Alicia M. LeVeze
UW School of Law
UW Box 353020
Seattle WA 98195

Erin K. McCann
The Mockingbird Society
2100 24th Ave S Ste 240
Seattle WA 98144

SIGNED in Tacoma, Washington, this 13th day of May, 2016.

A handwritten signature in black ink, appearing to read 'AK', written over a horizontal line.

AMANDA KAPPELMAN
Legal Assisntant to
PETER E. KAY
Assistant Attorney General
1250 Pacific Avenue, Suite 105
PO Box 2317
Tacoma, WA 98401
(253) 593-5243

OFFICE RECEPTIONIST, CLERK

To: Kappelman, Amanda (ATG)
Cc: nielsene@nwattorney.net; nelsond@nwattorney.net; dobsonlaw@comcast.net; backlundmistry@gmail.com; backlundmistry1@gmail.com; backlundmistry2@gmail.com; Kay, Peter (ATG); d'adre.cunningham@kingcounty.gov; alena.ciecko@kingcounty.gov; kathleen.mcclellan@kingcounty.gov; kelli.johnson@kingcounty.gov; anita.khandelwal@kingcounty.gov; lindalillevik@careylillevik.com; jrehberger@cascadialaw.com
Subject: RE: No. 91757-4 In re the Welfare of: K.M.M. State's Answer to Amicus Briefs

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Cc: nielsene@nwattorney.net; nelsond@nwattorney.net; dobsonlaw@comcast.net; backlundmistry@gmail.com; backlundmistry1@gmail.com; backlundmistry2@gmail.com; Kay, Peter (ATG) <PeterK@ATG.WA.GOV>; d'adre.cunningham@kingcounty.gov; alena.ciecko@kingcounty.gov; kathleen.mcclellan@kingcounty.gov; kelli.johnson@kingcounty.gov; anita.khandelwal@kingcounty.gov; lindalillevik@careylillevik.com; jrehberger@cascadialaw.com
Subject: No. 91757-4 In re the Welfare of: K.M.M. State's Answer to Amicus Briefs

Good afternoon,

Attached please find the State's Answer to Amicus Briefs of King County Department of Public Defense, Drs. Spieker and Harris, ACLU et al, and Center for Children & Youth Justice, et al. Hard copies will follow to opposing counsel.

Sincerely yours,

Amanda Kappelman
Legal Assistant, Social and Health Services
Office of the Attorney General
PO Box 2317
Tacoma WA 98401
MS: WT-31
Phone: (253) 593-6100
Fax: (253) 593-2449

"If you light a lamp for another, your own way will be lit.." Nichiren