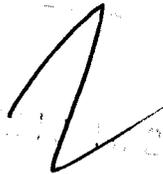


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No. 66062-4

WASHINGTON COURT OF APPEALS, DIVISION 1

DAVID FEIS,

Appellant/Plaintiff,

v.

KING COUNTY SHERIFF'S DEPARTMENT a
division of King County, Deputies CHRISTINA BARTLETT,
ERIC FRANKLIN, ABAGAIL STEEL AND KYLE
McCUTCHEON and DOES 1-5 inclusive,

Respondents/Defendants

APPELLANT'S REPLY BRIEF

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I. INTRODUCTION

Respondent's opposition completely fails to address why summary judgment was appropriate in this case as they have couched all of the facts in a light most favorable to them. In fact Respondents go to great lengths to address issues that Feis has not raised on appeal, such as the lawfulness of his arrest. Although Appellant is challenging the grant of summary judgment by the trial court in this case in its entirety, the primary issue presented by this appeal is whether, at the time of the entry into and the search of Feis's home and the subsequent seizure of his firearms, the law was clearly established that absent some compelling and immediate need for law enforcement to act quickly, such as a perceived medical emergency or exigent circumstances, a warrant was required.

Respondents' entire defense to this action is based on the proposition that any activity performed by the police that is not rooted in law enforcement or crime investigation constitutes an exception to the Fourth Amendments warrant requirement. Such an expansive interpretation of the narrow exceptions carved out by the United States Supreme Court to the mandate of the Fourth Amendment has never been suggested by any court in any jurisdiction in this country. Notwithstanding, Respondents ask this Court to give them a pass on their

constitutional violations simply because they have chosen to characterize the invasion and search of Feis's home as community caretaking.

Respondents have assumed without a scholarly analysis that there is a community caretaking exception to the Fourth Amendment's warrant requirement. We contend there is no such exception with respect to private residences and this has been the law in the Ninth Circuit for more than fifteen years. See United States v. Erickson, 991 F.2d 529, 530 (9th Cir. 1993).

Even if there has been some confusion as to the existence of a community caretaking exception for warrantless entry and search of private residences, the facts of this case do not justify its application nor does it provide the deputies with immunity for their conduct in this action.

In each case, whether state or federal, that has discussed what is believed to be a community caretaking exception to dwelling intrusions by law enforcement, the police were confronted with a situation requiring immediate action, where the application and ascertainment of a warrant would be impractical.

II. SUMMARY OF ARGUMENT

The deputies are not entitled to qualified immunity because the law was clearly established that absent one of the very narrowly defined exceptions to the warrant requirement, a warrantless entry and search of a

private dwelling violates the Fourth Amendment to the United States Constitution. The contours of the rights of homeowners to the sanctity of the home have been so well protected that no reasonable officer could have believed that an entry given these facts could be accomplished without a warrant. There is no case in any circuit or jurisdiction where a court upheld a warrantless entry and search of a home to retrieve firearms after an arrest was made outside of the home based on an officer's speculation that an arrestee might be released from custody at some time in the future and seek to exact revenge on the person pressing charges against him by utilizing his weapons against that person. Respondents have not cited a single authority to support their expansive view of the law.

In this case, prior to any entry and search of the residence by Deputy McCutcheon, the King County deputies had arrested Feis and had placed him in handcuffs and the alleged victim, who did not reside in the residence, had left the scene. The officers had the situation under control. There was no immediate threat, and more importantly, there was no one in the house in need of assistance, in danger or in need of medical attention. There was nothing going on inside the residence that required immediate action. Nor were there any exigent circumstances, such as threats of

violence, the sounds of gunshots, fighting or anything that suggested quick and immediate action was necessary to protect members of the public.

Each exception to the warrant requirement encompasses situations where it is simply not feasible for an officer to obtain a warrant. These situations include medical emergencies, an immediate danger to the public, the danger of escape, the destruction of evidence, the risk of harm to the public or police, the mobility of a vehicle, and hot pursuit of a suspect. None of these situations are present here.

Respondents have essentially conceded that the deputies violated the Fourth Amendment but seek to escape liability by labeling their transgressions as community caretaking functions. They argue that as long as law enforcement is not seeking to obtain evidence of a crime, a warrantless entry into a home to search for weapons is a community caretaking function. They further argue that since some courts in other parts of the country have not made it clear that the community caretaking function does not apply to private residences, the officers are entitled to qualified immunity.

Nothing in Respondents' 48 page opposition directly addresses how the police action in this case falls under a community caretaking exception, even as other courts have described it, or why it was not

feasible or practical for the police to simply obtain a warrant before, entering and searching the Feis home.

We ask this Court to find as a matter of law that Deputy McCutcheon's entry into and search of Feis's residence violated the Fourth Amendment. For the same reasons, the deputies' conduct constituted trespass and conversion under state law and the doctrine of qualified immunity does not apply under state law either.

III. ARGUMENT

A. **The Deputies Conduct in Entering The Feis Home Violated The Fourth Amendment**

The Fourth Amendment to the United States Constitution provides:

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

Of all the places that can be searched by the police, one's home is the most sacrosanct, and receives the greatest Fourth Amendment protection. See Payton v. New York, 445 U.S. 573, 585 (1980). "At the very core of the Fourth Amendment stands the right of a man to retreat into his own home and there be free from unreasonable governmental intrusion. . . With few exceptions, the question whether a warrantless search of a home is reasonable and hence constitutional must be answered

no.") (internal citations omitted). It is indeed a "basic principle of Fourth Amendment law that searches and seizures inside a home without a warrant are presumptively unreasonable." Id. at 586.

Warrants are generally required to search a person's home or his person unless the exigencies of the situation make the needs of law enforcement so compelling that the warrantless search is objectively reasonable under the Fourth Amendment. Mincey v. Arizona, 437 U.S. 385, 393-394, 98 S.Ct. 2408, 57 L.Ed.2d 290 (1978).

Law enforcement officers may enter a home without a warrant to render emergency assistance to an injured occupant or to protect an occupant from imminent injury. Id. at 392.

In Brigham City, Utah v. Stuart, 547 U.S. 398 (2006), the U.S. Supreme Court addressed the issue of Utah police officers' warrantless entry of a home, in response to the officers' belief that an occupant was imminently threatened with serious injury and held that:

"Police may enter a home without a warrant when they have an objectively reasonable basis for believing that an occupant is seriously injured or threatened with such injury." Id.

One exigency obviating the warrant requirement is the need to render emergency assistance to occupants of private property who are

seriously injured or threatened with such injury. Mincey, 437 U.S. 385, at 392.

The Supreme Court has repeatedly rejected Respondents' contention that, in assessing the reasonableness of an entry, consideration should be given to the subjective motivations of individual officers. See Brigham, supra. The fact that Sergeant Steele stated she was concerned for the safety of the complaining witness is irrelevant because she possessed no objective basis for her belief. CP 87, 85.

The key question is not the description of the event as a community caretaking function of law enforcement, but rather whether there was an emergency or other exigency that necessitated bypassing the warrant requirement. See Brigham, supra.

The United States Supreme Court has held that law enforcement officers are allowed to make a warrantless entry onto private property to fight a fire and investigate its cause, Michigan v. Tyler, 436 U.S. 499, 509, 98 S. Ct. 1942, 56 L. Ed. 2d 486 (1978), to prevent the imminent destruction of evidence, Ker v. California, 374 U.S. 23, 40, 83 S. Ct. 1623, 10 L. Ed. 2d 726 (1963), or to engage in " 'hot pursuit' " of a fleeing suspect, United States v. Santana, 427 U.S. 38, 42, 43, 96 S. Ct. 2406, 49 L. Ed. 2d 300 (1976).

The police have never been allowed to preemptively enter and search a private residence based on a subjective belief that an arrestee might be released from custody and become so enraged that he might use guns on his alleged accuser. See page 32 of Respondents' Brief. The conduct of these officers violated the Fourth Amendment a matter of law.

Apparently, Respondents concede that their conduct violated the Fourth Amendment, since they have not argued otherwise, but ask to be relieved of liability on the basis of qualified immunity because the officers did not know their conduct was unlawful.

B. The Deputies are not Entitled to Qualified Immunity For Violations of Federal Law

In assessing a claim of qualified immunity, the court generally follows the two-step sequence laid out in Saucier v. Katz, 533 U.S. 194 (2001). The court determines (1) whether the facts as alleged by the plaintiff show the defendant violated a constitutional right, and (2) whether the violated right was "clearly established" at the time of the alleged misconduct. Id. at 201-02.

If the defendants violated a clearly established constitutional right, they are not entitled to qualified immunity. Id. There is little dispute in this case that Feis's right under the Fourth Amendment to be free from a warrantless search and seizure was violated. The Respondents elected not to brief this element of Saucier. The only issue left to address is whether

the violated right was "clearly established" at the time of the alleged misconduct. Id., at 202.

The fact is, there has never been a case in any jurisdiction that carves out an exception to the warrant requirement for situations where a police officer surmises that an arrested person, who might possess guns, could be angry enough at his stepson, who no longer resides at the arrested person's home, to use those guns to harm his stepson, if and when he is released from custody. The assertion is ludicrous. Respondents have not cited to a single case or authority that has permitted this type of warrantless entry into a private home. No officer could reasonably believe that the Fourth Amendment permits all warrantless entries into private dwellings where the stated motive is not investigation of a crime.

In support of their qualified immunity argument, Respondents speculate on what might have happened if Feis managed to bail out of jail and became enraged and used his guns on Joshua. See page 47 of Respondents' Brief. In support of this terrorizing proposition, Respondents discuss what they believe has happened in the past. See page 33 of Respondents' Brief. However, Respondents do not discuss in any fashion, the objective evidence they possessed of the potential for violence, or why they did not seek a judicial order or a warrant to enter the residence and retrieve the weapons. The core protection of the Fourth

Amendment would be eroded if, in order to enter a home, an officer were required only to have a reasonable law-enforcement purpose that a court could later find outweighed a person's privacy interest.

Under Respondents' reasoning officers could, without a warrant, enter any residence suspected of housing lawfully possessed firearms, knives or any weapons and remove them, later insulating themselves from 1983 liability by claiming their conduct fell under the guise of community caretaking, a blanket exception to the Fourth Amendment. Such reasoning would presumably protect officers who felt that for their safety, kids should not have sugarcoated cereal in their home or be exposed to alcohol. These concerns are as much 'community caretaking' as the situation presented in this case. Could police enter private homes without a warrant to remove items that it considered dangerous, such as bats, knives, clippers, or pornography? There would be no end to what the police could consider community caretaking.

An extension of this theory would all but eliminate the warrant requirement for entering homes. The Fourth Amendment protections would be obliterated. Anytime the police want to enter a private residence without a warrant or an emergency, they need only conjure up a non-investigatory reason to do so, even if such reason is not supported by objective facts. Finally, if the police were to have arrested Feis for

allegedly slapping Joshua in Bellevue, would a reasonable officer be justified under law enforcements' community caretaking function to then drive to Feis's home in North Seattle, enter his home without a warrant, search and seize his weapons? Could the officers assert qualified immunity by saying that they were concerned for what might happen to Joshua once Feis was released from custody, so they were justified in searching for and retrieving his firearms. There was no reasonable basis whatsoever to associate any potential need for assistance Josh may have had with Feis's bedroom and his gun cases. This is not now, nor has it ever been the law.

To support this novel approach to Constitutional jurisprudence, Respondents cite to a litany of Washington Appellate cases involving the heinous use firearms. See page 33 of Respondents' Brief. It is obvious these cases are included solely for shock value, as there is no evidence Feis ever used, threatened to use, has been arrested for, illegally obtained, or has been anything but a responsible gun owner. The Respondents attempt to justify their conduct by making it appear as though Joshua was in imminent danger, but cite to no facts in support of such an assertion.

On balance, the threat to Joshua, if any existed, was remote. Feis was handcuffed outside the home and was en route to jail. CP 85, 57-62. Feis's guns inside his home were clearly not within his reach, and the

entire incident had occurred outside. CP 84, 38. No immediate threat, injury, or emergency required the deputies' presence inside the home. Feis's privacy interests, on the other hand, are obvious to anyone who dwells in a home and owns guns for protection. It is a unique hallmark of American jurisprudence, that ever since our struggle for independence from British rule, courts have consistently upheld an individual's right to own guns and their right to privacy in their homes.

Respondents cite to a host of Washington Appellate Court cases addressing the suppression of evidence in criminal cases as proof that the community caretaking function applies to residences. See pages 29-30 of Respondents' Brief, citing Goldsmith v. Snohomish County, 558 F.Supp.2d 1140, 1146-47 (W.D. WA 2008), State v. Hos, 225 P.3d 389, 154 Wn.App. 238 (2010), State v. Moore, 129 Wn. App. 870, 120 P.3d 635 (2005), and State v. Acrey, 148 Wn.2d 738, 748, 64 P.3d 594 (2003). A careful analysis of each case reveals that none of them stands for that proposition.

In Goldsmith, Snohomish County Sheriff's deputies responded to a Snohomish County Fire District request to subdue a violent patient. Goldsmith, at 1146-47. The court held that "the deputies' entry into Goldsmith's home was justified to prevent injury to and assist the injured Plaintiff." Id. and see Brigham, supra.

In Hos, Jefferson County Sheriff's deputies responded to a Child Protective Services social worker's request to accompany her to Hos's residence. Hos, at 242. After knocking loudly several times and receiving no response, the deputy looked through a window and saw Hos slumped over on a couch. Id. The deputy could not tell if she was conscious or dead, so he entered her home to render aid. Id., at 243.

The Hos court upheld the warrantless entry because it met the requirements of the community caretaking exception, which applies when "(1) the officer subjectively believed that someone likely needed assistance for health or safety reasons; (2) a reasonable person in the same situation would similarly believe that there was a need for assistance; and (3) there was a reasonable basis to associate the need for assistance with the place searched." Id., at 246-47, citing State v. Kinzy, Wn.2d 373, 386-87, 5 P.3d 668 (2000).

In each one of these cases, aside from Moore and Acrey, which addressed a traffic stop and a Terry stop, respectively, there was something going on inside the home requiring the officers to act immediately. Hos and Goldsmith could have been upheld on emergency or exigent circumstances grounds.

In the instant case, there was no injury inside the home requiring entry, nor anyone inside the home requiring assistance. Indeed, the

deputies concede that “the entire incident occurred outside, in the front yard.” CP 88, 96. A reasonable officer would not believe that entry into the home was needed to subdue Feis or prevent injury or assist Joshua. Feis was handcuffed outside the house, and Joshua, who had allegedly been slapped on the face, did not request or receive medical attention and was outside the house the entire time. CP 88, 96. There was no immediate need to enter Feis’ home.

More than a decade before the incident in question, the Ninth Circuit addressed the application of the “community caretaking doctrine” to a warrantless search of a home in Erickson, 991 F.2d 529. The officers in Erickson were investigating a suspected burglary. Id., at 530. While walking around the perimeter of the house, an officer pulled back a plastic sheet covering a basement window and, after observing marijuana plants inside, obtained a search warrant, entered the home and seized the plants. Id.

The Erickson court clearly and unambiguously held that “[t]he fact that a police officer is performing a community caretaking function cannot by itself justify a warrantless search of a private residence.” Id., at 531. “The warrantless search of Erickson’s residence was not justified by any of the established exceptions to the warrant requirement, such as consent

or exigent circumstances. Thus it was presumptively unreasonable.” (internal quotation marks omitted) Id., at 532 (quoting Payton, at 586).

The community caretaking function of law enforcement has never permitted the police to enter a home without a warrant strictly to seize property. The two state law cases cited by Respondents involved an emergency that is presently occurring inside the home. See page 29 of Respondents' Brief; Goldsmith, supra; Hos, supra;

There is simply no case law to support a belief that if (1) a suspect is arrested for allegedly slapping an allegedly cohabiting victim, all while outside the home, then (2) the police are permitted to enter and search the areas of the home exclusively under the control of the suspect, according to the victim’s wishes, and then (3) confiscate the suspect’s weapons in order to protect the victim from a possible threat in the future when and if the suspect posts bail, when and if the suspect returns home angry enough to possibly use his weapons to shoot the alleged victim.

The Respondents’ last attempt to create confusion where none exists is evinced by their citations to out of circuit federal cases. See pages 36, 39-43 of Respondents' Brief. After iterating that police officers are definitely not lawyers, Respondents cite to *over a dozen* out of Circuit cases to illustrate how the deputies could not reasonably have known that

their warrantless search and seizure violated the Constitution. See pages 39-43 of Respondents' Brief.

Like the state cases previously cited, these cases also dealt with situations where law enforcement were confronted with something happening inside a residence requiring immediate action, making the obtaining of a warrant impractical or futile. Not one case involved an officer's subjective impression of what might happen under certain circumstances.

Even if the Deputies had been reading out of circuit court opinions involving criminal procedure, the fact of the matter is that the contours of the exceptions to the Fourth Amendment warrant requirement in *this circuit* were clearly established and well defined.

Washington courts are clear in ruling which types of searches are permitted, regardless of whether they call it “community caretaking,” or “the “emergency doctrine.” In every case where a search and seizure of a home is upheld, there was an emergency presently occurring inside the home, the suspect was not already detained, and the items seized were either in plain view or an element of the crime was being investigated. See Goldsmith, Hos, Gocken, et al.

C. Respondents' Brief is Inaccurate and Misleading Both Factually and in With Respect To the Citation of the Law

The deputies inexplicably propound over twenty pages of what they describe as “facts,” apparently in support of their claim that they had probable cause to arrest Feis. See pages 2-23 of Respondents' Brief. These “facts” include a 9-1-1 recording containing information none of the officers possessed at the time of arrest. See page 2 of Respondents' Brief. They include an investigator’s interview with Hope a day after the incident, again, a matter irrelevant to the search and seizure, and for that matter, the arrest. See pages 15-19 of Respondents' Brief. None of these “facts” have anything to do with the issue on appeal: whether a reasonable officer would know they are not permitted to enter a home without a warrant, exigent circumstances or an emergency, in order to seize property unrelated to a crime.

Respondents cite Acrey, 148 Wn.2d 738, at 748, to support their assertion that

“[t]he community caretaking exception to the warrant requirement applies where the police enter private property for purposes other than the investigation of crime or the acquisition of evidence.”

(emphasis original) See page 30 of Respondents' Brief. Upon even a casual glance at Acrey, the Court will see that nowhere in their decision did the Acrey court mention anything remotely resembling this assertion.

Acrey involved a 12 year old boy who was stopped on the streets of Renton shortly after midnight. Acrey, at 741. The sole issue addressed by the court was whether the “community caretaking function” exception to the warrant requirement permitted the police to detain the boy while they contacted his mother after lawfully stopping him. Id. The court found that the seizure was unreasonable, the pat-down unjustified, and the evidence gathered should have been suppressed. Id., at 760.

The Acrey court never mentions entry onto private property. The Acrey court was faced with completely different issues from this case. Appellant Feis implores this Court to closely scrutinize the Respondents' brief for similar errors.

Respondents cite State v. Chenoweth, 160 Wn.2d 454, 476, 158 P.3d 595 (2007) for the proposition that “the court must base its qualified immunity analysis on the facts known to the investigating deputies at the time of their actions.” See page 44 of Respondents' Brief. First, the Chenoweth court never addressed qualified immunity. See Chenoweth. Respondents cite to page 476 of Chenoweth, where the court discusses probable cause to support a search warrant; *not* qualified immunity. Id., at 476. Second, the proposition stated by the Respondents is not supported by case law; when determining whether qualified immunity applies, courts are to examine whether the officers violated a clearly established

constitutional right. See Saucier, 201-02. Third, the Respondents cite Chenoweth in a string cite with “Monday v. Oullette,” and State v. Moore, supra, without providing a page cite for Moore, or any citation whatsoever for Monday v. Oullette.

Regardless, the Moore court, like that in Chenoweth, does not address qualified immunity. Rather, the Moore court addresses whether probable cause exists to support a search warrant. Moore, at 887. The legal analysis involved in determining whether the police have established probable cause to support a search warrant is not interchangeable with an analysis of whether the police are entitled to qualified immunity for a warrantless search.

The Respondents assert that the police have a right, after arresting someone away from their home, to immediately enter their home without a warrant to take their guns, so that when they return from jail they won't shoot anyone. See pages 45-46 of Respondents' Brief. Since the Fourth Amendment was enacted, courts have never allowed the police to act with such impunity.

IV. CONCLUSION

The Respondents have no defense to the Fourth Amendment claim that Appellant has put forth in this appeal. The opposition is primarily

devoted to demonstrating the legality of Feis's arrest and establishing probable cause.

Appellant therefore request that this Court order that the entry, and search of Appellant's residence and the seizure of his firearms violated the Fourth Amendment as a matter of law. He further requests that this Court award Appellant reasonable attorney fees and cost and to remand this case to the trial court for the determination of damages.

DATED this 13 day of April, 2011.

Respectfully submitted,

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DECLARATION OF SERVICE

I certify under penalty of under the laws of the State of Washington that on this day I caused to be delivered via legal messenger a copy of the Appellant's Reply Brief to counsel of record listed below and the original to the Court of Appeals, Division I to the following:

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Original Appellants Reply Brief and 1 copy

DATED: April 13, 2011 at Bellevue, Washington.



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