

FILED
October 29, 2015
Court of Appeals
Division I
State of Washington

NO. 73652-3-I

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION ONE

STATE OF WASHINGTON,

Respondent,

v.

T.M.K. (a minor child),

Appellant.

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

MOTION FOR ACCELERATED REVIEW OF JUVENILE
MANIFEST INJUSTICE DISPOSITION AND BRIEF
(RCW 13.40.230 & RAP 18.13)

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I. IDENTITY OF MOVING PARTY

Appellant, T.M.K. (DOB 2/11/2000), upon all files, records and proceedings herein, moves this Court for the relief requested below.

II. STATEMENT OF RELIEF SOUGHT

The appellant seeks accelerated review, pursuant to RCW 13.40.230 and RAP 18.13 of the manifest injustice disposition imposed on June 26, 2015. Upon review, Appellant requests this Court vacate the manifest injustice disposition and remand for the entry of a disposition within the standard range.

III. ASSIGNMENTS OF ERROR AND RELATED ISSUES

The reasons relied upon by the juvenile court for the imposition a manifest injustice disposition, i.e., the potential for offender specific treatment, lack of sustaining family control, and a need for increased intervention in T.M.K.'s life, were not sufficiently supported by the record to clearly and convincingly support the aggravated disposition imposed.

IV. FACTS RELEVANT TO MOTION

T.M.K. was charged by information filed in the Juvenile Department of the King County Superior Court on April 29, 2015, with indecent liberties, contrary to RCW 9A.44.100(1)(b).¹ CP 1-2.

On June 26, 2015, T.M.K. entered a plea of guilty to the charge. CP 18-25; 6/26/15RP 6-18. The court then turned to the disposition and heard from the complainant, T.M.K.'s step-mother, who described being home recovering from oral surgery. 6/26/15RP 21. She was "somewhat incapacitated" as a result of pain medications and resting in a recliner when T.M.K. touched her breast. Id. at 21-22. She then went on to describe how T.M.K.'s "deviant behavior escalated" to the point, "my husband and I decided to make a report before there was another victim." Id. at 22-23.

¹ RCW 9A.44.100. Indecent liberties, provides in pertinent part:

- (1) A person is guilty of indecent liberties when he or she knowingly causes another person to have sexual contact with him or her or another:
 - (a) By forcible compulsion;
 - (b) When the other person is incapable of consent by reason of being mentally defective, mentally incapacitated, or physically helpless;
-
- (2)(a) Except as provided in (b) of this subsection, indecent liberties is a class B felony.
- (b) Indecent liberties by forcible compulsion is a class A felony.

The Juvenile Probation Counselor (JPC), Kirsten Knutson, met with T.M.K. and each set of parents.² Id. at 25. Based the information she developed, JPC Knutson argued for a manifest injustice disposition based on victim vulnerability, although lack of sustaining family control and a need for treatment in various forms were subsequently invoked as well. Id. at 26-27, 38-44.

T.M.K. objected to the imposition of a manifest injustice disposition and the “particular vulnerability” factor specifically. 6/26/15RP 44-46. As for mitigating factors, T.M.K. had no prior criminal history and has been consistently involved in various forms of counseling since he was a young boy.³ Id. at 46-47.

T.M.K.’s step-mother described a variety of concerning behaviors, however, T.M.K. was:

...unequivocally not admitting any of the allegations of other incidents in this – in this [JPC] report. They’re kind of referred to, but again, no statements, nothing bring out, nothing in the sense of that, and so the court

² Ms. Knutson testified she has been a probation counselor for 15 years and been working with juvenile sex offenders for 13 years. 6/26/15RP 31-32. She specifically highlighted her experience with treatment providers about the adverse effects of pornography on children. Id. at 32-33, 36-37.

³ T.M.K.’s father described the counselling he participated in, including “in state counseling with Seattle Mental Health. We’ve had him in paid private counseling. We’ve had him in church counseling. We’ve had him in the Wraparound counseling, and although he’s been willing to attend, he – he has not been willing to participate.” 6/26/15RP 65.

should know that we are unequivocally – unequivocally not going to that (phonetic), admitting any size [sic] of any of those.

Id. at 49. Other innocuous facts such as his spending time in his room, or communicating people and acquaintances by computer, were cited but failed to support the call for an aggravated disposition, particularly in light of indications “[T.M.K.] likes going to church with the family. ... Going on camping trips with his family.” Id. at 48-49.

With regard to T.M.K.’s treatment needs, counsel argued there appeared to be no “basis in any way that this is somehow going to provide additional treatment that will make a difference that amount of manifest injustice.” Id. at 51.

All youth in residential facilities participate individual DBT counseling and EB tills (sic) group – skills group the entire course of the residential stay regardless of length.

So nowhere has there been anything provided that really indicates any additional services that would somehow make JR – make manifest injustice appropriate.

6/26/15RP 52.

When Judge Mack asked for a “risk analysis,” she was advised that one had not been done. Id. at 55-57.

The prosecutor argued for an aggravated disposition based on the lack of family or parental control and “the respondent’s treatment

needs as well as the high risk of re-offense.” Id. at 57. The prosecutor noted that T.M.K.’s prior treatment included WRAP services, “the highest level of treatment that – that families can receive out in the community,” and concluded this indicated respondent’s treatment needs are greater than can be addressed by his parents or by the community. Id. at 58. The prosecutor went on to explain that she believed the manifest injustice disposition was necessary because:

[When Ms. Knutson spoke to JRA] they said is if the respondent has about seven weeks in right now, as – and he’ll – six and a half by the time he gets to JRA, it will be about seven weeks, so that leaves between 8 and 29 weeks at JRA. And what the treatment provider said was that the respondent would barely be able to get settled into a treatment program during that period of time before release planning could begin.

Id. at 58.

And what Ms. Knutson talked about is that there – there is this release planning that is essential to the respondent being successful once he is released. So if he doesn’t have enough time to do the work on himself and then all of a sudden is doing release planning, there is – it’s – the release planning is not going to do any good in the world because he hasn’t done the time – the work on himself. And I think that’s actually the key of what Ms. Knutson wrote in her report is that there has to be time for the respondent to do his own treatment before they start working on release planning because he is not going to get parole services, and so it is essential that there is this extended time.

Id. at 59-60.

Counsel for T.M.K. reiterated “I don’t know how this treatment is going to be any different. There’s been no evidence provided that this treatment is somehow going to be different than all the years’ prior treatment and that it will make a difference to give him a few additional weeks of this treatment.” Id. at 61-62.

T.M.K.’s mother also explained her commitment and concerns:

You know, I want him home. Of course I want him home. I love him. I miss him. But it just wasn’t safe for him, and I had no control over what he was doing. He was running. He was just spiraling, running, and didn’t care. He didn’t care the consequences or he was hurting or that he was hurting himself, and he told me that on occasion.

Id. at 69. She explained that “I’ve supported him and loved him and tried to get him the help he needs. And you can’t help someone that doesn’t want help. You can’t help someone that isn’t willing to receive help.” Id.

On his own behalf, T.M.K. noted that he was interested in “environmental sustainability and “what we need to do for, like global warming to prevent the world from falling apart pretty much.” Id. at 70. T.M.K. volunteered that he enjoys video games, reading and learning new things. Id. at 71, 73.

Ultimately, Judge Mack found the commission of this offense by a minor against an adult was “unusual.” 6/26/15RP 75. Then, citing the “concerning behaviors that go way back,” Judge Mack ordered a manifest injustice disposition of 39 to 52 weeks commitment to the Juvenile Rehabilitation Administration (JRA) based on a lack of sustain family and social control. 6/26/15RP 77; CP 5-17, 26.

T.M.K. timely appealed the manifest injustice disposition. CP 27.

Finding of fact and conclusions of law in support of the disposition were entered following a subsequent hearing on July 31, 2015. CP 28-30; 7/31/15RP 3-10.

V. GROUNDS FOR RELIEF SOUGHT

A. ACCELERATED REVIEW IS REQUIRED BECAUSE T.M.K. RECEIVED A DISPOSITION OUTSIDE THE STANDARD RANGE.

Both statute and court rule provide for accelerated review of juvenile dispositions outside the standard range. Manifest injustice dispositions are subject to accelerated review pursuant to RCW 13.40.230. RAP 18.13 provides the procedure for obtaining accelerated review of juvenile dispositions outside the standard range. A motion is

the appropriate method for requesting accelerated review under RAP 18.13(b).

T.M.K. received a disposition of 39-52 weeks confinement which was outside the standard range of 15-36 weeks for this offense. CP 26. As a result, accelerated review of the disposition is appropriate.

B. THE DISPOSITION SHOULD BE REVERSED BECAUSE THE JUVENILE COURT ERRED IN CONCLUDING ENTRY OF THE STANDARD RANGE DISPOSITION WOULD CONSTITUTE A MANIFEST INJUSTICE.

1. Manifest injustice dispositions must satisfy rigid statutory criteria.

The “manifest injustice” threshold is high; it cannot be breached unless there is clear and convincing evidence that the juvenile and the standard range present a clear danger to society. State v. N.E., 70 Wn.App. 602, 606, 854 P.2d 672 (1993). To uphold a disposition outside the standard range, this Court must find:

(a) that the reasons supplied by the disposition judge are supported by the record which was before the judge and that those reasons clearly and convincingly support the conclusion that a disposition within the standard range would constitute a manifest injustice, and (b) that the sentence imposed was neither clearly excessive nor clearly too lenient.

RCW 13.40.230(2). The Washington Supreme Court in Rhodes described it as a threefold test:

(1) the reasons given by the trial court [that imposition of the standard range would be a manifest injustice] must be supported by the record; (2) those reasons must clearly and convincingly support the disposition; and (3) the disposition cannot be too excessive or too lenient.

State v. Rhodes, 92 Wn.2d 755, 760, 600 P.2d 1264 (1979). If a manifest injustice disposition fails any one of the three prongs, it will not be upheld on appeal. RCW 13.40.230(3).

In this case, the juvenile court found that because the offense was committed “against an adult, his step-mother, which takes this offense outside the realm of sex offenses usually committed by juveniles.” CP 29. The juvenile court then identified three aggravating factors to support the manifest injustice disposition:

- a) According to the Juvenile Probation Counselor (JPC), sex offense specific treatment in the community is not available for the respondent. A standard range sentence would not allow the respondent to complete offense specific treatment available at JRA, and *the manifest injustice sentence imposed may allow him to receive treatment* from a certified sex offender treatment provider.
- b) As indicated in the JPC report, *there is a lack of sustaining family control*. The respondent’s mother indicated that she is, at times, afraid of the respondent, who has “rages’ that are uncontrollable” when she sets limits. Twice he has kicked in her locked bedroom door. He has physically assaulted her, and has a history of fire-setting, abuse of animals, and viewing pornography. Both families (mother, and father and stepmother) report similar issues.
- c) The respondent has been in therapy in the community since he was six years old. These services have included individual counseling, in-home counseling, and WRAP team

services. He committed this offense despite these services. The JPC reported that “he has difficulty applying adaptive skills discussed in counseling to his day-to-day life.” *The respondent needs a higher level of intervention than is available in the community.*

CP 29 (emphasis added).

The juvenile court’s failure to make or enter findings on other potential factors relied upon by the JPC or prosecutor must be interpreted as a rejection of the contentions therein. State v. Armenta, 134 Wn.2d 1, 14, 948 P.2d 1280 (1997). The absence of a finding on “particular vulnerability” then is plainly indicative of the court’s rejection of this proffered basis.

2. This disposition should be reversed because the reasons given are not supported by the record and do not clearly and convincingly support the disposition.

In T.M.K.’s case, the juvenile court relies on a) the possibility of treatment for a certified sex offender treatment provider, b) the lack of sustaining family control and c) the need for a higher level of intervention than is available in the community. CP 29. T.M.K. contends these were not adequately supported by the record and collectively fail to support the disposition.

a. Possible sex offender treatment by a certified provider.

In enacting the JJA, the legislature's intent was, in part, to “respond[] to the needs of youthful offenders” by providing “necessary treatment.” RCW 13.40.010(2). *See also State v. Duncan*, 90 Wn.App. 808, 812, 960 P.2d 941 (1998) (“purposes [of JJA] include protection of the citizenry and provision of necessary treatment, supervision and custody for juvenile offenders”). It is proper, therefore, that a trial court consider a juvenile's need for treatment in requiring a manifest injustice determination. *State v. S.H.*, 75 Wn.App. 1, 12, 877 P.2d 205, review denied, 125 Wn.2d 1016 (1994) (“Responding to a need for treatment is an appropriate basis for a manifest injustice disposition and is determined by the specific needs of the particular defendant.”); *State v. Taula*, 54 Wn.App. 81, 87, 771 P.2d 1188 (1989). Further, an extended period of structured residential care and specialized treatment may be appropriate where a juvenile is considered a high risk to reoffend. *State v. T.E.C.*, 122 Wn.App. 9, 17–18, 92 P.3d 263 (2004) (quoting *State v. J.N.*, 64 Wn.App. 112, 114–15, 823 P.2d 1128 (1992)).

It is crucial however that in responding to need for treatment as a basis for manifest injustice disposition, it must be determined by specific needs of particular juvenile. *S.H.*, 75 Wn.App. at 11-12.

While there was considerable detail provided regarding T.M.K.'s history of therapy and counseling, the record fails to provide the necessary detail regarding the specific treatment at JRA which would necessitate the materially longer commitment. Where the juvenile will engage in a variety of programs described during a standard range disposition, no compelling reason exists to extend the commitment further.

Finally, RCW 13.40.150(5) plainly provides:

A court may not commit a juvenile to a state institution solely because of the lack of facilities, including treatment facilities, existing in the community.

This is, however, exactly what has occurred to T.M.K. and requires vacation of the manifest injustice finding.

b. Lack of sustaining family control was not sufficiently compelling.

A lack of parental or family control has been recognized as a proper potential aggravating factor. See e.g. State v. T.E.C., 122 Wn.App. 9, 17–18; State v. N.E., 70 Wn.App. 602, 604–05, 854 P.2d 672 (1993) (criminal history and drug abuse, in addition to lack of parental control, rendered N.E. a high risk to reoffend). T.M.K.'s mother did testify that she “had no control over what he was doing.”

6/26/15RP 69. Nevertheless, she reiterated that “I want him home. Of course I want him home. I love him. I miss him.” Id.

In light of the demonstrated familial commitment to involving T.M.K. in counseling and therapy this factor has minimal weight in establishing the need for a manifest injustice disposition. To the extent that it does, it appears to duplicate the third factor.

c. The need for a higher level of intervention than is available in the community.

JPC Knutson explained that the treatment coordinator at Echo Glen had described a collection of potential issues that might be dealt with there. 6/16/15RP 38. Treatment modalities available to T.M.K. at Echo Glen were described as having:

access to psychiatric monitoring of his medication that has previously been prescribed but currently not being taken for his ADHD, ODD and again, I believe that there has been some issues with depression off and on. They would be able to check in with him regarding his suicidal ideation, which we have seen off and on downstairs. He will have – so he will have that medication monitoring and that mental health treatment.

He will have access to a counselor who is specifically assigned to work with [T.M.K.]. He will be given DBT skill instruction with that individual counselor that he will be able to practice that on – on demand within the milieu at Echo Glen, which is proven to be very effective in skill building with kids. That is also reinforced in group therapy that – that high lights DBT.

[T.M.K.] is going to be offered drug and alcohol education at a minimum. I don't see at this point – he's not reporting and nor is any family member reporting an actual abuse diagnosis, but he will be provided with that drug and alcohol education. He will be provided with aggression replacement training on command in the milieu as well as (undecipherable) on demand in the milieu as well as in group intervention.

And finally, Your Honor, he will be able to access – he will be required to complete what is called a BCA, a Behavioral Chain Analysis, which is specific to his offense, and he will be required to go over that individually with his counselor there and then also be afforded the opportunity to present – to present that to group so he can get feedback from peers.

My hope in making this request for the lengthier stay at Echo Glen is that [T.M.K.], if he embraces this treatment program or even just shows signs that he is amendable to making changes and that he is willing to work and make those changes to the problematic behaviors, then he could earn his way to a minimum security facility.

RP 40-41.

The access to specific sex offender treatment, which was crucial to the manifest injustice finding, however, was speculative at best. As

JPC Knutson explains:

...it's fairly recent that the Juvenile Justice and Rehabilitation Administration has been able to hire and provide consulting certified sexual offender treatment providers in those minimum security facilities. At this time, the ones that I'm thinking of are located in Tacoma, Woodinville, and in the Tri-Cities.

RP 41-42. Failing a placement in one of these facilities however, T.M.K. will not have probation or parole upon his release and, therefore, no means of accessing these services based on his offense. RP 42-43.

As the JPC explained, Echo Glen may be able to include family members in the treatment and release planning, but nothing relates this to the need for a manifest injustice disposition.

[T]he coordinator for the Juvenile Justice and Rehabilitation Administration, Katie Penrose, what she does in the course of release planning is she does assessments through these team meetings, and she is able to make a referral to – for this family for functional family therapy for a very limited time following release even though parole would not be there to enforce it. But it would be offered. Either that or FFT.

RP 43-44.

Furthermore, because one of the stated purposes of the Juvenile Justice Act (JJA) is to provide punishment commensurate with the juvenile offender's criminal history (RCW 13.40.010) there must be something more than the offenses themselves which are already being counted in the determination of the standard range. The aggravating factors upon which the juvenile court relied do not provide clear and convincing support for the manifest injustice finding, i.e. that a

standard range disposition “would impose a serious and clear danger to society in light of the purposes of the Juvenile Justice Act of 1977.”

State v. M.L., 134 Wn.2d 657, 660, 952 P.2d 187 (1998).

RCW 13.40 requires a juvenile court consider any mitigating as well as aggravating factors when imposing a manifest injustice disposition. State v. Fellers, 37 Wn.App. 613, 618-19, 683 P.2d 209 (1984). Critically here, T.M.K. came to the court with no prior criminal history. 6/16/15RP 10. Moreover, the evidence indicated T.M.K. himself had been abused when he was six or seven years old. 6/16/15RP 20. On balance, the record fails to establish the standard range would impose a clear danger to society. In light of this, the commitment to JRA for up to a year was also contrary to the statutory bar in RCW 13.40.150(5).

3. The disposition should be reversed because it was clearly excessive in the absence of support in the record for the 52 week commitment.

The final requirement of RCW 13.40.230(2) is “that the sentence imposed was neither clearly excessive nor clearly too lenient.” Although the length of a manifest injustice disposition is reviewed for abuse of discretion, “[t]he length of a sentence beyond the standard

range must find support in the record....” State v. B.E.W., 65 Wn.App. 370, 375, 828 P.2d 87 (1992). In S.H., this Court noted:

‘[N]one of the purposes of the JJA suggest that the sentencing judge ought to behave in speculative predictions about the likely behavior of a juvenile offender while in confinement.’ These considerations also apply to the length of a manifest injustice disposition.

State v. S.H., 75 Wn.App. at 15-16 (quoting State v. Bourgeois, 72 Wn.App. 650, 660-61, 866 P.2d 43 (1994)).

Once a juvenile court has legitimately decided to depart from the standard range, it has broad discretion to determine the length of a manifest injustice disposition. State v. Taulala, 54 Wn.App. at 86. Nevertheless, the court must have a tenable basis for its determination. State v. S.S., 67 Wn.App. 800, 819, 840 P.2d 891 (1992).

T.M.K. believes that in light the uncertainty regarding available treatment and his long term involvement while in the community, that the additional commitment herein was not justified by the record before the juvenile court.

VI. CONCLUSION

This case should be heard on accelerated review because T.M.K. received a disposition beyond the standard range. Upon review, the manifest injustice disposition should be reversed and remanded for the imposition of a standard range disposition.

Respectfully submitted this 29th day of October 2015.

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**IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE**

STATE OF WASHINGTON,)	
)	
Respondent,)	
)	
v.)	NO. 73652-3-I
)	
T.M.K.)	
)	
Juvenile Appellant.)	

DECLARATION OF DOCUMENT FILING AND SERVICE

I, MARIA ARRANZA RILEY, STATE THAT ON THE 29TH DAY OF OCTOBER, 2015, I CAUSED THE ORIGINAL **OPENING BRIEF OF APPELLANT** TO BE FILED IN THE **COURT OF APPEALS – DIVISION ONE** AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

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