IN THE SUPREME COURT

OF THE STATE OF CALIFORNIA

JEFFREY WALKER *Petitioner / Defendant* *vs.* Superior Court of the State of California, County of San Francisco, *Respondent,* People of the State of California, *Real Party in Interest / Plaintiff,*	No. S263588 Court of Appeal No. A159563 (San Francisco Sup. Ct. No.s 2219428 (195989))

APPLICATION TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF PETITIONER JEFFREY WALKER;

AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONER JEFFREY WALKER

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I. APPLICATION TO FILE *AMICUS CURIAE* BRIEF

A. THE PROPOSED *AMICUS* BRIEF WOULD ASSIST THE COURT IN DECIDING THIS MATTER

The court is presented with a split of authority. Two California appellate courts have held that case-specific hearsay is not admissible via the expert at a sexually violent predator ("SVP") probable cause hearing. (*Bennett v. Sup. Ct.* (2019) 39 Cal.App.5th 862; *People v. Sup. Ct. (Couthren)* (2019) 41 Cal.App.5th 1001.) A third has held that section 6602's[1] command to "review the petition" created a broad hearsay exception, allowing in any content in the reports, regardless of whether or not they are attached to the petition. (*Walker v. Sup. Ct.* (2020) 51 Cal.App.5th 682.) As the court knows, review was granted in *Walker*. The court is tasked with determining which approach is correct.

The *Walker* court made numerous logical and legal errors which *amicus* believes could be further expounded beyond pleadings before the court. Specifically, *amicus* respectfully believes the court should consider: (1) how to construe the word "review" in section 6602; (2) how dissimilar a section 6601.5 "paper review" and a section 6602 probable cause hearing should be, particularly in light of three-step processes for resolving disputes found in criminal and civil litigation; (3) certain specific reasons *Parker* and *Cooley* do not support *Walker*; and (4) myriad other logical errors committed by the *Walker* court.

[1] Statutory citations are to the Welfare and Institutions Code except where otherwise noted.

Amicus therefore seeks leave of the court to brief these issues, in less than 5,000 words,[2] so that the court can have a complete record of all issues to consider when making its decision. This court should reject *Walker's* judicial legislation and follow the plain language of the statute and the *Sanchez* decision, as the *Couthren* and *Bennett* courts did.

No party or counsel for a party in the pending matter has authored this brief in whole or in part or made a monetary contribution intended to fund the preparation of submission of this brief. (Cal. Rules of Court, rule 8.520(f)(4).)

Filing of this brief will not prejudice any party. Neither party has filed briefing to-date and respondent will have ample time to respond to these arguments. Moreover, California Rules of Court, rule 8.520, subdivision (f)(7) allows for either party to respond if leave to file this brief is granted.

B. STATEMENT OF INTEREST OF *AMICUS CURIAE*

Amicus William Morse is currently a defendant in a sexually violent predator action, Imperial County Superior Court number EMH-000347. At Morse's hearing, the court sustained an objection to case-specific hearsay under *Sanchez*. However, the court nonetheless considered the expert's conclusions, over objection by defense. The trial court found probable cause that Morse was an SVP.

[2] The Microsoft Word program used to generate this brief counted approximately 4,600 words.

Morse petitioned the Fourth District Court of Appeal, Division One for a writ of habeas corpus / mandamus reversing the lower court's decision and dismissing the petition against him, case number D077483. Not long after the petition was filed, *Walker* was decided. The return by the attorney general cites and argues *Walker* extensively, and the traverse naturally argues against following *Walker*. Although briefing is complete, oral argument has yet to be set and Morse's case has not yet been decided by the appellate court.

Had Morse's case been decided slightly earlier, and an adverse determination been made in the court of appeal, Morse would be petitioning the Supreme Court alongside Walker. Similarly, if Morse faces an adverse determination in the appellate court while the Supreme Court is considering this matter, he will be petitioning for review and relief. This court's decision in this matter is likely to determine the fate of Morse's pending appeal.

II. SECTION 6602 DID NOT CREATE A HEARSAY EXCEPTION; WALKER IS WRONG

Section 6602 provides for a probable cause hearing, not a hearsay exception. In reaching a contrary conclusion (against the previously-settled weight of authority in *Bennett* and *Couthren*), *Walker* errantly equated the term "review" with "admit" or "receive." (*Walker v. Sup. Ct.,*

(2020) 51 Cal.App.5th 682, A159563, at p. 16.[3]) Doing so removes a fundamental step in what should be a three-part process and reduces the contested evidentiary hearing of section 6602 to little more than the paper review of section 6601.5, but the two procedural steps are not, and should not be, so similar. *Parker* and *Cooley* lend no support to *Walker; Parker* established a limited exception to the best evidence rule, which did not survive *Sanchez* and *Cooley* did not consider the issue. Finally, following *Walker* would also involve a number of other logical errors. The *Walker* decision was wrong, and this court should follow its own holding in *Sanchez* and the reasoning from *Bennett* and *Couthren.*

A. REASONABLE CONSTRUCTION OF "REVIEW" CANNOT EQUATE IT WITH "ADMIT" OR "RECEIVE"

The *Walker* court erred in its interpretation of the statute by failing to consider the plain meaning of the words. "Review" is not synonymous with "admit" or receive." Merriam-Webster and Black's agree on this point. Section 6602's command to "review the petition," then, cannot be read as commanding anything be received in evidence.

"Review" is defined as "a general survey" or "[c]onsideration, inspection, or reexamination of a subject or thing." (REVIEW, Merriam-Webster Online, at https://www.merriam-webster.com/dictionary/review [as of Aug. 16, 2010.]; REVIEW, Black's

[3] Citations of *Walker* to pages in the official PDF available through the appellate court's official website. This pagination may differ from cites to Westlaw or Lexis.

Law Dictionary (11th ed. 2019), respectively.) Neither "admit" nor "receive" appears in either definition for "review."

Turning to "receive" and "admit," Black's defines "receive" as follows: "1. To take … to come into possession of or get from some outside source … 2. To give (someone) admittance; *to admit to entrance*." (RECEIVE, Black's, *supra,* emphasis added.) Merriam-Webster's take is similar: "1: to come into possession of : acquire … 3a : to permit to enter : *admit*." (RECEIVE, Merriam-Webster Online, at https://merriam-webster.com/dictionary/review [as of Aug. 16, 2020], emphasis added.)

Finally, "admit" means "to allow entry" in Merriam-Webster. (ADMIT, Merriam-Webster Online, at https://merriam-webster.com/dictionary/admit [as of Aug. 16, 2020], emphasis added.) Black's lacks an independent entry for admit. "Admission of Evidence" is defined as "[t]he allowance before a fact-finder of testimony, documents, or other materials for consideration in determining the facts at issue in a trial or hearing." Black's entry on "Evidence" does not contain the word "review." It does, however, refer to "admissible evidence," and its synonyms, "competent evidence," "proper evidence," and "legal evidence." "Reviewable evidence" does not appear as a term and is *not* given as synonymous to "admissible evidence." (EVIDENCE, Black's, *supra.*)

Hence, "receive" and "admit" involve, in a sense, the absorption of something, receiving an item or admitting a visitor. "Review," in contrast, is merely a viewing or consideration of a matter. "Review"

cannot be reasonably construed as synonymous with "admit" or "receive."

Two hypotheticals involving the admission of evidence and a preliminary hearing will help to illustrate the common use of the words:

First, consider when party seeks to admit records, and those records are supported by a declaration which the proponent asserts is a sufficient business records declaration. (Ev. Code, §§ 1561-62.) To determine if the declaration is sufficient, the court would first *review* it. If the declaration was sufficient, the court would then *admit* the declaration. Then, the court and parties would turn to the records.

The records may contain both admissible and inadmissible portions. I.e., the records may contain both material that is relevant and properly founded, as well as material that could be irrelevant, prejudicial, lacking other necessary foundation, or otherwise objectionable. (*See generally, inter alia,* Ev. Code, §§ 350, 352, 1200 *et seq*.) To determine what to *admit* or *receive*, the court and parties would *review* the documents as a whole. The admissible portions would then be *admitted* or *received* into evidence, and the inadmissible portions (which had been *reviewed* but not *received*) excluded.

Second, consider a hypothetical criminal preliminary hearing where the judge *does not* review the complaint. A witness testifies to a possible crime of one type on one day. A different witness testifies to a possible crime of a different type on another day. Are both of these objectionable as irrelevant? Neither? Without knowing the allegations, the court could not resolve even the most fundamental evidentiary issue

of relevance. The court must review the complaint to know what the prosecution is trying to prove.

Had the legislature wished the petition (or exhibits to it, or other matter) to be admissible, it would have unequivocally stated so, as it has in other contexts. Those contexts include the Lanterman-Petris-Short Act, where section 5256.4 explicitly states the factfinder "shall not be bound by rules of procedure or evidence." (§ 5256.4.) Juvenile hearings similarly state that the court "shall receive in evidence the social study" relevant to those hearings. (§§ 358, subdivision (b), 706.) Such language is absent from section 6602. Section 6602 did not create a hearsay exception.

B. THE "PAPER REVIEW" PROCEEDING OF SECTION 6601.5 IS NOT SIMILAR TO THE CONTESTED EVIDENTIARY HEARING OF SECTION 6602.

A "paper review," be it a demurrer or some other proceeding, is not similar to a contested hearing involving the rules of evidence, whether that hearing be a SVP probable cause hearing or a criminal preliminary hearing

Various litigation procedures provide for a three-step process to resolve disputes. First, a facial paper review may be conducted (a demurrer in the civil or criminal context). (Code of Civ. Proc, §§ 430.10 *et seq.*; Pen. Code, §§ 1004 *et seq.*) Second, an early termination procedure may take place when, though the *allegations* may be sufficient to plead a cause of action, there is insufficient *evidence* to support the action and no real factual dispute to resolve (a motion for summary judgment in the

civil context or a preliminary hearing and Penal Code section 995 motion in the criminal context). (Code Civ. Proc., § 437c; Pen. Code, § 866(b), 995.) Finally, a full trial will resolve any remaining issues.

The SVP act is no different. Section 6601.5 provides for a paper review. (*In re Parker* (1998) 60 Cal.App.4th 1453, 1466.) Section 6602 provides for a probable cause hearing which has been held analogous to a criminal preliminary hearing, requiring evidence to be presented. (*Cooley v. Sup. Ct.* (2002) 29 Cal.4th 228, 247, 257.) Finally, section 6604 provides for a trial to resolve any remaining disputes.

The rules of evidence do not apply to the first "paper review" stage, because a paper review only challenges the face of the document. In the civil litigation context, a demurrer "may object … *to the pleading* … on any one or more of the following grounds" (Code Civ. Proc., § 430.10, emphasis added.) In the criminal litigation context, a defendant demurring is similarly limited to objections "on the face" of the pleading. (Pen. Code, § 1004.) And finally, in the SVP context, the paper review stage provided for in section 6601.5 is limited to a determination of "*whether the petition states*" sufficient matter to believe the defendant is a SVP. (Emphasis added.)

The second, evidentiary, stage is different. In the SVP context, the judicial officer is no longer determining merely "whether the petition states" probable cause; rather, the officer must determine "whether there is probable cause" at a hearing. (§§ 6601.5, 6602.) This key language change is further illuminated by the changes in the headings of the statutes: Section 6601.5 is entitled "Review of petition …" whereas 6602 is titled "Probable cause hearing …" Clearly, the legislature

intended two different contexts, with the former being a paper review and the latter being a contested hearing. The section 6601.5 and 6602 stages are thus no more similar than a demurrer and a preliminary hearing (or a demurrer and motion for summary judgment).

C. *PARKER* AND *COOLEY* DO NOT SUPPORT *WALKER*

Parker addressed the issue of whether a simple "paper review" was an adequate hearing under a due process analysis, and answered that question in the negative. ((1998) 60 Cal.App.4th 1453, 1466.) *Parker* did not hold that the prosecution could admit *any evidence* simply by having it included in the reports. (*Id.* at p. 1469-70.) Rather, *Parker* held that "the prosecutor may present *the opinions* of the experts" through the reports. (*Ibid.*, emphasis added.) *Parker* did not explain why it thought this procedure was acceptable; the issue of presenting reports was ancillary to the central "hearing" issue and not analyzed. (*Id.* at p. 1469-70.) In any case, reading *Parker* more broadly, allowing the experts to communicate case-specific hearsay, would bring it into direct conflict with *Sanchez*.

Cooley's asserted approval of *Parker* is a single dicta footnote regarding an uncontested and unexamined issue. ((2002) 29 Cal.4th 228, 245, fn.8.; *People v. Sup. Ct. (Couthren)* (2019) 41 Cal.App.5th 1001, 1017.) *Cooley*, like *Parker*, analyzed what procedure was due at a SVP probable cause hearing, and did not analyze the application of the Evidence Code to SVP probable cause hearings. The *Cooley* court held that the SVP Act "allows for greater procedural safeguards" than the LPS act. (*Id.* at p. 254.) That court also repeatedly held that a SVP probable cause hearing was analogous to a criminal preliminary hearing. (*Id.* at pp. 247, 257.)

"Like a criminal preliminary hearing, the only purpose of the probable cause hearing is to test the sufficiency of the *evidence* supporting the SVPA petition." (*Id.* at p. 247, emphasis added.)

Cooley's analogizing of criminal preliminary hearings supports *Bennett* and *Couthren,* not *Walker.* Though a single-layer hearsay exception exists for certain investigating officers testifying at a criminal preliminary hearing, multiple hearsay is not permitted nor is the use of a "reader" officer to merely recite others' observations. (*Couthren, supra,* 41 Cal.App.5th at p. 1018.) And even if *Parker* or *Cooley* could be read to endorse the view that a broad hearsay exception existed for experts at SVP probable cause hearings, such rules would be "no longer tenable in the wake of *Sanchez*." (*Id.* at p. 1019.)

Allowing the reports, and all contents therein, to be admitted will functionally reduce the probable cause hearing to a second "paper review" owing to the low standard of probable cause. When determining if probable cause exists, a judge must resolve all conflicts of evidence and all reasonable inferences in favor of the prosecution. (*People v. Plengsangtip* (2007) 148 Cal.App.4th 825, 835.) Therefore, once the reports are admitted, it is functionally impossible to contest the underlying facts in a way where a court can legally find in favor of the defendant. Whatever deficiencies the defendant exposes in the hearsay contents will be disregarded except in the extreme case where the prosecutorial evidence is "wholly implausible." (*Cooley, supra* 29 Cal.4th at p. 258.) The ultimate result is a charade wherein the defendant is invited to present evidence, but cannot prevail as a practical matter. A second paper review was already condemned in *Parker* as a violation of due process. (*Parker, supra* 60 Cal.App.4th at 1466.)

For these reasons, *Parker* and *Cooley* do not support *Walker*.

D. *WALKER'S* OTHER ERRORS

The *Walker* court also made numerous other logical errors. It acknowledged the reports might not be attached to the petition, yet held the command to review the petition meant the (possibly not) attached reports, and all content therein, should be admitted. That court also did not explain why the legislature was able to specify hearsay exceptions in other contexts in the Welfare and Institutions Code, but not in the SVP context. *Walker* did not consider AB 1983, gave too much weight to Penal Code section 865, and failed to properly implement Evidence Code section 300. That court also errantly concluded that SVP reports are neutral. Finally, the *Walker* court considered problems that may arise from requiring proper evidence at the SVP probable cause proceeding, but did not consider the policy benefits that would also arise. Each of these is discussed in turn.

The *Walker* opinion begins with the language from section 6602 that the judge "shall review the petition." (*Id.* at p. 14.) The opinion then acknowledges that sometimes the experts' reports will be attached to the petition, but sometimes not. (*Ibid.*) Yet the *Walker* court still held the command to review the petition "requires the court to review the evaluations" (which may not be attached), thereby creating a hearsay exception. (*Id.* at p. 15.) The court also held that its ruling was "not an open-ended invitation for prosecutors to attach just any document to the petition." (*Ibid.*)

The *Walker* court thus began by disregarding the first principle of statutory construction, the plain language of a statute controls. (*Diamond Multimedia Systems, Inc. v. Sup. Ct.* (1999) 19 Cal.4th 1036, 1047.) The court confused "review" with "admit" or "receive." It broadened the definition of "petition" to include reports that may not be attached. Ultimately, it allowed admission of the reports (and all hearsay therein) regardless of whether the reports were attached to the petition or not. Yet the court also asserted its ruling excluded other items of evidence that *could* be attached to the petition, making the rule it created internally inconsistent.

While purporting to interpret words that were clear, *Walker* also placed too much emphasis on the absence of a "directive" to review the petition at trial. (*Walker, supra* A159563 at p. 19.) No command to review the pleading exists in Welfare and Institutions Code section 6604 (providing for a trial) because provisions of the Code of Civil Procedure guide the conduct of the trial. In a jury trial, the statutes provide for instruction to the jury. (Code Civ. Proc., §§ 607a - 609.) In a bench trial, the judicial officer acts as finder of fact and issues a statement of decision if requested. (*Id.* at §§ 631.8 - 32.) In contrast, the SVP probable cause hearing cannot be said to be guided by similar provisions of the Code of Civil Procedure. A simple command to review a petition, to know *what* the prosecution is seeking to prove prior to determining *if* there is probable cause to believe there is evidentiary substance, does not establish a hearsay exception.

Walker did not explain why the legislature was able to explicitly provide for admission of reports in the LPS and juvenile contexts yet chose different wording in the SVP context. The *Walker* court cited

Conservatorship of Manton with approval for the proposition that duplicative hearings should be avoided. (*Id.* at p. 18; (1985) 39 Cal.3d 645.) But *Walker* gave no weight to the fact that an SVP trial includes a right to jury and proof beyond a reasonable doubt, two significant differences from the probable cause hearing. (§§ 6602, 6604.) Nor did *Walker* acknowledge *Cooley's* statement that the SVP Act provided for "greater procedural safeguards" than the LPS Act. (*Cooley, supra* 29 Cal.4th at p. 254.)

The *Walker* court acknowledged that *Bennett* and *Couthren* analogized the SVP probable cause hearing to a criminal preliminary hearing, but did not acknowledge their source, *Cooley*. (*Walker, supra* A159563 at p. 22; *Cooley, supra* 29 Cal.4th at pp. 247, 257.) *Walker* expressed concern about subjecting victims to repeated testimony, and lamented the absence of a Proposition 115-like hearsay exception in the SVP probable cause hearing context. (*Walker, supra* A159563 at p. 22.) But of course section 6600, subdivision (a)(3), already spares at least one victim any trouble testifying at the probable cause hearing or trial. Assembly Bill 1983, if it passes and is held constitutional, may alleviate other victims' burdens, but the *Walker* court did not consider it. (*Id.;* Ass. Bill 1983 (2019-202), Reg. Sess. as amended March 11, 2020.)

Walker used Penal Code section 865 to distinguish the criminal preliminary hearing. (*Id.* at p. 22.) Section 865 is "declaratory of fundamental procedural rights" and "derived from our earliest criminal legislation." (*Jennings v. Sup. Ct.* (1967) 66 Cal.2d 867, 875.) It states simply that witnesses shall be examined in the presence of the defendant. (Penal Code, § 865.) The *Walker* court took this humble statute as evidence that the prosecution at a criminal preliminary hearing must

present its case by examining witnesses. True, but the court then inferred that the lack of a similar provision in the SVP Act was an invitation to deviate from the rules of evidence.

This reading contravenes Evidence Code section 300. The legislature has already specified the Evidence Code applies to all actions except those before a grand jury. (Ev. Code, § 300.) Ignoring this provision and demanding the legislature affirmatively declare the rules of evidence apply to certain hearings stands section 300 on its head. And creating hearsay exceptions whenever the legislature has not explicitly prohibited the court from doing so usurps the domain of the legislature.

Moreover, the *Walker* court errantly assumed SVP reports at the probable cause hearing stage are neutral and therefore reliable. It analogized the SVP reports to juvenile case studies and distinguished them from accident reports filed by a party in a DMV hearing. (*Walker, supra* A159563 at p. 18.) But for a SVP case to have proceeded to the probable cause hearing stage, the reports must necessarily be adversarial to the defendant. If the reports were favorable to the defendant, there would be no petition filed. (§ 6601, subds. (f), (h)(1).) Even *Parker* acknowledged the experts were adverse witnesses, referring to the defendant's right to "call such experts for *cross*-examination." (*Parker, supra* 60 Cal.App.4th 1470, emphasis added.)

To avoid conflict with *Sanchez, Walker* concluded that the hearsay exception of *Parker* allowed for admission into evidence of all the contents of reports at a SVP probable cause hearing. (*Walker, supra* A159563 at p. 21.) This conclusion ignores the plain language of *Parker,* providing for only the admission of the *opinions*. (*Parker, supra* 60

Cal.App.4th 1469-70.) It gives greater weight to *Cooley's* dicta footnote than to *Cooley's* repeated analogizing of the SVP probable cause hearing to the criminal preliminary hearing. (*Cooley, supra* 29 Cal.4th at pp. 245, fn. 8, 247, 257.) And it ascribes a certain clairvoyance to the *Parker* and *Cooley* decisions: that the decisions could foresee a major development in expert hearsay law, and that those courts—which did not analyze what hearsay an expert could rely on or relate—would reach the same conclusions with the same force after the seminal decision in *Sanchez*.

The *Walker* court gave great weight to the problems that might arise if the reports were not admissible, but did not consider the benefits that could follow. (*Walker, supra* A159563 at pp. 22-23.) Forcing the prosecution to present evidence at the probable cause hearing is likely to assist both parties in determining the merits of the case and preparing for trial. All parties and cases agree that, at trial, *Sanchez* applies, and that the experts must offer live testimony based on admitted evidence. The probable cause hearing can serve the purpose of giving a preview of what evidence the experts will be allowed to rely on when giving their final opinion at trial. The experts can then review and revise their opinions in advance, giving both sides more time to analyze the opinions that will likely control the trial's outcome.

Testimony at the probable cause hearing is also likely to benefit the prosecution. Witnesses can become unavailable. Having prior testimony, where the adverse party had an opportunity to cross-examine, would allow the prosecution to take advantage of Evidence Code section 1291, providing for admission of prior testimony. Moreover, a victim or witness to a particularly heinous event may find it notably easier to testify before a lone judicial officer instead of a jury box of strangers.

Walker did not consider how the burden of proof functionally reduces the probable cause hearing to a second paper review if the reports are admitted wholesale, as discussed at page 14, *ante*. Rather, the *Walker* court simply found, without citation, that it was "highly unlikely" for the legislature to have intended evidence to be presented at both the probable cause hearing and the trial. (*Walker, supra* A159563, at p. 19.)

Finally, the *Walker* court did not consider the purpose of probable cause hearings—to weed out cases where the evidence is insufficient, without forcing an accused to languish in commitment for months or years as the parties ready for trial.

Whether additional hearsay exceptions are good policy is an inquiry for the legislature. By reading a command to review a pleading as an expansive hearsay exception (which predated yet perplexingly survived *Sanchez*), the *Walker* court overstepped the boundary between interpretation of a statute and judicial legislation. *Walker* is wrong.

III. CONCLUSION

The *Walker* court took a simple command to review a pleading and created an expansive hearsay exception unsupported by the language of the statute. In doing so, it made several other missteps in logic. The appellate court should be reversed.

Dated: September 25, 2020 /s/Darren Bean

Darren Bean

PROOF OF SERVICE

APPLICATION TO FILE *AMICUS CURIAE* BRIEF IN SUPPORT OF PETITIONER JEFFREY WALKER; *AMICUS CURIAE* BRIEF IN SUPPORT OF PETITIONER JEFFREY WALKER

WALKER v. SUPERIOR COURT (PEOPLE) S263588
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(Cal. Rules of Court, rules 2.251(i)(1)& 8.71 (f)(1)

I, the undersigned, declare that I am over 18 years of age and not a party to the within cause. I am employed in the County of Imperial, State of California. My business address is 896 Broadway, El Centro, California 92243. The email address used to e-serve is:darrenbean@co.imperial.ca.us. On September 25, 2020, I caused to be served a true copy of the above-stated documents by electronic delivery through TrueFiling to each of the following at the email addresses below. I uploaded a pdf version of the above-identified documents to the TrueFiling site for the Supreme Court of the State of California for electronic service to the following:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 25, 2020 at El Centro, California.

/s/Darren Bean

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **WALKER v. S.C. (PEOPLE)**
Case Number: **S263588**
Lower Court Case Number: **A159563**

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/s/Darren Bean

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Last Name, First Name (PNum)

Imperial County Public Defender

Law Firm