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PIERCE COUNTY CLERK
NO: 25-2-12417-2

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY**

J.M., T.W., J.S., H.G., N.S., C.S., B.L., J.F.,
Z.T., A.Q., N.D., C.M., B.M., and M.A.,

Plaintiffs,

v.

ISAAC S. POPE, M.D. and BEVERLY J.
POPE, husband and wife and their marital
community; STATE OF WASHINGTON,
DEPARTMENT OF SOCIAL AND HEALTH
SERVICES; DEPARTMENT OF CHILDREN,
YOUTH and FAMILIES; JUVENILE
REHABILITATION ADMINISTRATION;
GREEN HILL SCHOOL, and MAPLE LANE
SCHOOL, governmental entities, and DOES 1-
5,

Defendants.

Case No: 25-2-12417-2

**FIRST AMENDED COMPLAINT
FOR SEXUAL ABUSE,
NEGLIGENCE, AND OTHER
DAMAGES**

Demand for Jury Trial

Plaintiffs, through their attorneys David S. Vogel, Anne M. Bremner, and Patrick D.
Moore, allege:

I. STATEMENT OF THE CASE

1. Nature of the Action. This is a negligence action against the State of
Washington, Department of Social and Health Services ("DSHS"), Department of Children,
Youth and Families ("DCYF"), Juvenile Rehabilitation Administration ("JRA"), and the Green

COMPLAINT FOR DAMAGES - 1

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1 Hill and Maple Lane Schools for their systemic failure to protect Plaintiffs, who were removed
2 to State's custody and control and then placed at the Green Hill School in Chehalis,
3 Washington ("Green Hill") and Maple Lane School in Centralia, Washington ("Maple Lane").
4 The State failed to protect Plaintiffs for whom they had created special, custodial relationships
5 and, instead, actively endangered them and sacrificed their well-being to protect themselves
6 from liability.

7 2. A Culture of Sexual Abuse. For years prior to the time Plaintiffs were repeatedly
8 sexually abused at Green Hill and Maple Lane by staff, including Dr. Isaac Pope, Defendants
9 were made aware through numerous sources that a culture of sexually inappropriate behavior
10 by both guards and staff against the residents at Green Hill and Maple Lane pervaded the
11 institutions. The knowledge of this culture of abuse went all the way to the highest levels of
12 management of Green Hill and Maple Lane and, upon information and belief, the highest levels
13 of the Juvenile Rehabilitation divisions of DSHS and DCYF. Because of this culture, which
14 allowed and even fostered sexual abuse of residents of Green Hill and Maple Lane, Plaintiffs
15 and many other Green Hill and Maple Lane residents were repeatedly sexually abused while in
16 State custody.

17 3. State Defendants Failed to Supervise Dr. Isaac Pope. Dr. Isaac Pope served as
18 medical director and pediatrician for Maple Lane from 1982 to June 2000. He also served as
19 medical director and pediatrician for Green Hill from 1982 to June 2020. The State was or
20 should have been on notice that on December 13, 1993, the Department of Children, Youth and
21 Families ("DCYF") received a report of child abuse against Dr. Pope from a psychologist. The
22 State also was or should also have been on notice that, in 1999, allegations were raised by
23 Jennifer Schmidt (O'Brien as a teenager) before the WA Medical Qualifications Commission
24 that Dr. Pope had initiated a sexual relationship with her when she was a fourteen-year-old
25 patient. The State likewise was or should have been on notice that on October 4, 2003, the
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Chronicle Newspaper for Lewis County published a 12-page article detailing the allegations.¹ Nevertheless, the State allowed and enabled Dr. Pope to conduct mandatory physical exams of teenagers at Maple Lane and Green Hill Schools for thirty-eight years, behind closed doors without any observers present.

4. Dr. Pope Molested and Raped Hundreds of Children. This is also an action against Dr. Pope for sexual battery, for systematically molesting and raping the children who were placed in his care. During hundreds of his physical examinations (including those of the Plaintiffs), in the guise of an examination for cancer of the penis and the scrotum, Dr. Pope would fondle the genitals of his patients and would often try to arouse and cause them to ejaculate, for his own sexual gratification. During hundreds of these examinations (including those of the Plaintiffs), in the guise of a “standard” examination for prostate cancer, Dr. Pope would rape these young men by inserting his fingers or his thumb in their anus, for his own sexual gratification. In some of these cases, Dr. Pope, who was at least 6’2” and a physically powerful man, anally raped his victims with his penis.

II. PARTIES

A. Plaintiffs

5. Plaintiff J.M. was placed at Green Hill in Lewis County, Washington, from approximately 1999 through 2001. He was 16 years old when he arrived. He currently resides in Pierce County, Washington.

6. Plaintiff T.W. was placed at Maple Lane School in Thurston County, Washington, from approximately 1999 through 2001. He was 15 years old when he arrived. He currently resides in Pierce County, Washington.

7. Plaintiff J.S. was placed at Maple Lane School in Thurston County, Washington,

¹ See <https://www.chronline.com/stories/dr-pope-faces-sex-abuse-allegation.247945>

1 from approximately 2005 through 2006. He was about 15 years old when he arrived. He
2 currently resides in Mason County, Washington.

3 8. Plaintiff H.G. was placed at Green Hill in Lewis County, Washington, from
4 approximately 2005 to 2007 and he was about 16 years old when he arrived. He currently
5 resides in King County, Washington.

6 9. Plaintiff N.S. was placed at Green Hill in Lewis County, Washington, from
7 approximately 2006 through 2011 and he was about 14 years old when he arrived. She (N.S. is
8 now a trans female) currently resides in Pierce County, Washington.

9 10. Plaintiff C.S. was placed at Green Hill in Lewis County, Washington, in 2009,
10 when he was almost 17 years old. He currently resides in Pierce County, Washington.

11 11. Plaintiff B.L. was placed at Green Hill in Lewis County, Washington, in 2010,
12 when he was 15 years old. He currently resides in Pierce County, Washington.

13 12. Plaintiff J.F. was placed at Green Hill in Lewis County, Washington, in 2010
14 when he was about 16 years old. He currently resides in Walla Walla County, Washington.

15 13. Plaintiff Z.T. was placed at Green Hill School in Lewis County, Washington,
16 from approximately 2011 through 2012. He was about 16 years old when he arrived. He
17 currently resides in Marion County, Oregon.

18 14. Plaintiff A.Q. was placed at Green Hill in Lewis County, Washington, from
19 approximately 2013 through 2014. He was about 16 years old when he arrived. He currently
20 resides in Clark County, Washington.

21 15. Plaintiff N.D. was placed at Green Hill in Lewis County, Washington, from
22 approximately 2015 through 2017. He was about 15 years old when he arrived. He currently
23 resides in Pierce County, Washington.

24 16. Plaintiff C.M. was placed at Green Hill in Lewis County, Washington, in 2020.
25 He was 17 years old when he arrived. He currently resides in Pierce County, Washington
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1 17. Plaintiff B.M. was placed at Green Hill in Lewis County, Washington, in 2020.
2 He was 17 years old when he arrived. He currently resides in Pierce County, Washington.

3 18. Plaintiff M.A. was placed at Green Hill in Lewis County, Washington, in 2020.
4 He was 17 years old when he arrived. He currently resides in Pierce County, Washington.

5 **B. Defendants**

6 19. As a Doctor working for the State of Washington, Dr. Issac Pope M.D. was
7 charged with the care and protection of the Plaintiffs. Defendant Pope resides in Lewis County,
8 Washington.

9 20. Beverly J. Pope is married to Dr. Issac Pope M.D. and is named for her part of
10 their marital community. Defendant Beverly Pope resides in Lewis County, Washington.

11 21. The State of Washington; Department of Social and Health Services;
12 Department of Children, Youth and Families; Juvenile Rehabilitation Administration, and the
13 Green Hill and Maple Lane Schools are or were the State of Washington agencies and sub-
14 agencies charged with the care of Plaintiffs, and with the responsibility to investigate the Green
15 Hill and Maple Lane Schools for conditions dangerous to the welfare of children placed there,
16 including Plaintiffs.

17 22. Dr. Pope enlisted the assistance of Doe Defendant guards, who knowingly and
18 willingly protected him and enforced his perverse directives. Upon information and belief, Doe
19 Defendant guards reside in Lewis and Thurston Counties, Washington.

20 **III. JURISDICTION AND VENUE**

21 23. Plaintiffs have each filed standard tort claims with the Office of Risk
22 Management, under Chapter 4.92 RCW. Over sixty (60) days have elapsed since the claims
23 were filed. The notice of claim requirement of Chapter 4.92 RCW has been satisfied.

24 24. The Superior Court of Pierce County has jurisdiction over this matter under
25 RCW 2.08.010 and RCW 4.92.010.

25. Venue lies in Pierce County, Washington under RCW 4.92.010(1).

IV. STATUTE OF LIMITATIONS

26. Plaintiffs' claims have each been filed within three years, or sooner, of when they learned that Dr. Isaac Pope, the State of Washington and its agencies breached the applicable standards of care and/or owed them duties which caused their injuries and/or discovered the causal connection between the abuse and the injuries for which this suit was brought. See RCW 4.16.340.

V. PLAINTIFFS' ALLEGATIONS

A. General Allegations

27. Green Hill School is a medium/maximum security fenced facility for male juvenile offenders in Chehalis, Washington. At all times relevant, the State of Washington and its agencies were charged with exercising care in placing children at Green Hill School and ensuring that they were protected against sexual abuse.

28. Maple Lane School was, at all times relevant,² a medium/maximum security fenced facility for male juvenile offenders in Centralia, Washington. The State of Washington and its agencies were charged with exercising care in placing children at Maple Lane School and ensuring that they were protected against sexual abuse.

29. Since the 1980s, Green Hill and Maple Lane Schools fostered a culture of sexual abuse and cover-ups. Supervision of the staff was laissez faire at best and at worst supervisory staff actively condoned the abuse and protected the abusers.

30. Through numerous sources, the State knew or should have known that a culture of sexually inappropriate behavior pervaded the Green Hill and Maple Lane Schools. The knowledge of this culture of abuse went all the way to the highest levels of management of

² Maple Lane School closed at the end of 2011. It was later reopened as a behavioral health facility.

1 Green Hill and Maple Lane Schools and, upon information and belief, to the highest levels of
2 those State agencies charged with protecting the children sent there. Because of this culture,
3 which allowed and even fostered sexual abuse of residents of Green Hill and Maple Lane
4 Schools, Plaintiffs, and many other Green Hill and Maple Lane School residents were
5 repeatedly sexually abused while in State custody while wards of the State.

6 31. The State was or should have been on notice that Dr. Pope was routinely and
7 methodically conducting unnecessary digital rectal “examinations” of his patients (not
8 medically recommended for men under forty). He was widely known to inmates of Green Hill
9 and Maple Lane as “Doctor Big Fingers” and “Sticky Fingers.” Upon information and belief,
10 many of the staff at Green Hill and Maple Lane were aware of these monikers for Dr. Pope.

11 32. Nevertheless, the State not only allowed but enabled Dr. Pope to conduct
12 mandatory initial physical exams of juveniles at Maple Lane and Green Hill Schools for thirty-
13 eight years, without any observers present. During many of these examinations Dr. Pope had a
14 guard stationed outside his door, prepared to enter the room and restrain or subdue a patient if
15 he resisted Pope’s digital rectal “examinations.”

16 33. On June 7, 2019, after a lawsuit was filed against Green Hill School with sworn
17 allegations that Dr. Pope had sexually abused a resident of Green Hill during an intake physical
18 exam in 2001, Jennifer Redman, the Superintendent of Green Hill School, filed a report of
19 these “historical allegations” with the Department of Children, Youth and Family Services.

20 34. Superintendent Redman then sent a letter that Dr. Pope has acknowledged under
21 oath "stated that I was not to do a physical exam unless I had a nurse in attendance." *See*
22 Exhibit 1, Excerpted Transcript of January 5, 2021, Deposition of Isaac Pope, p. 98, at lines 5–
23 6., *C.H., et al. v. State of Washington, DSHS, et al.*, Pierce County Superior Court No. 18-2-
24 12594-0.

25 35. The State allowed Dr. Pope to ignore this directive. In 2020, less than a year
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1 after being instructed not to conduct physicals without a nurse present, Dr. Pope was continuing
2 his well-practiced and still-unsupervised routine of molesting and raping juvenile residents of
3 Green Hill under the false pretext of examining them for cancer. Dr. Pope enlisted the
4 assistance of guards who knowingly and willingly protected him and enforced his perverse
5 directives.

6 36. Additionally, it was common for the female staff at these schools to engage in
7 sexually abusive relationships with the residents, who were routinely minors.

8 37. When complaints about sexual abuse were brought to the attention of the facility
9 staff, investigations were conducted in a grossly inadequate manner, if at all. Suppression of
10 complaints and retaliation against complainants were common.

11 38. The State, its agencies, and its sub-agencies were charged with the care of
12 Plaintiffs, as well as the responsibility to investigate Green Hill and Maple Lane Schools for
13 conditions dangerous to the welfare of children placed there, including Plaintiffs. The State,
14 through grossly negligent and negligent conduct of its agents, created an unreasonable danger
15 for, and caused irreparable harm to the boys sent to Green Hill and Maple Lane Schools. This
16 case addresses those injuries and damages of Plaintiffs that were caused by the neglect,
17 mistreatment, sexual exploitation, and deprivation of the most basic human needs during their
18 stay at Green Hill and/or Maple Lane.

19 **B. Plaintiff J.M.**

20 39. Plaintiff J.M. was placed at Green Hill School from approximately 1999 through
21 2001. He was 16 years old when he arrived.

22 40. After J.M. was admitted to Green Hill School, during what were represented to
23 be two routine, mandatory physical exams, Dr. Isaac Pope fondled his genitals and stuck his
24 huge fingers into Plaintiff's rectum.

1 **C. Plaintiff T.W.**

2 41. Plaintiff T.W. was placed at Maple Lane School from approximately 1999
3 through 2001. He was 15 years old when he arrived.

4 42. T.W. was first sexually abused at Maple Lane when he was taken into a back
5 office and molested by Counselor Ms. Deemer.

6 43. T.W. was then required to have two “checkups” with Dr. Isaac Pope, who
7 inserted his fingers into Plaintiff’s rectum while masturbating Plaintiff until he ejaculated.

8 44. Before he left Maple Lane, T.W. was also sexually abused by an older, heavysset
9 female kitchen worker, whose name is unknown to T.W.

10 **D. Plaintiff J.S.**

11 45. Plaintiff J.S. was placed at Maple Lane School from approximately 2005
12 through 2006. He was 15 years old when he arrived.

13 46. Before he could join Maple Lane’s general population, J.S. had to pass a
14 mandatory physical exam conducted by Dr. Isaac Pope.

15 47. During this examination, Dr. Pope masturbated J.S. until ejaculation. Then,
16 without wearing gloves, Dr. Pope repeatedly thrust at least one of his fingers in and out of
17 J.S.’ anus, while grabbing and fondling his buttocks.

18 48. During the next four months, J.S. was called to see Dr. Pope for three more
19 “examinations.” During each of these three visits, Dr. Pope coerced J.S. to perform fellatio on
20 him, and during each of these three visits, Dr. Pope raped J.S.’ anus with his penis.

21 **E. Plaintiff H.G.**

22 49. Plaintiff H.G. was placed at Green Hill School from approximately 2005 and
23 2007. He was about 16 years old when he first arrived.

24 50. Before he could join Green Hill’s general population, H.G. had to pass a
25 mandatory physical exam conducted by Dr. Isaac Pope.

1 51. During this examination Dr. Pope told H.G. that he needed to do a digital
2 examination of H.G.'s rectum. H.G. told Dr. Pope that he did not want that. Dr. Pope then told
3 him that if he refused the digital rectal examination, H.G. would have to spend his time at
4 Green Hill in solitary confinement. H.G. allowed the exam. Dr. Pope had H.G. bend over the
5 exam table, and Dr. Pope repeatedly shoved at least one of his fingers into and out of H.G.'s
6 anus, first with and later without a glove on.

7 52. While using the fingers of one hand to go in and out of H.G.'s anus, Dr. Pope
8 used his other hand to fondle and caress H.G.'s testicles ("to make sure there were no lumps").
9 After instructing H.G. to turn around toward him and stand straight, Dr. Pope kneeled in front
10 of H.G. and fondled H.G.'s testicles with his right hand, put lubricant on H.G.'s penis, and
11 caressed it, stroking up and down with his left hand.

12 53. When H.G.'s penis became erect, Dr. Pope asked H.G. if he liked women or
13 men. When H.G. said that he preferred women, Dr. Pope said, "are you sure? Because he
14 (indicating at H.G.'s erect penis) says otherwise."

15 54. Dr. Pope then asked 16-year-old H.G. if he were a virgin, and H.G. answered
16 yes. Dr. Pope then told H.G. it's possible that H.G. liked both men and women. He told H.G. to
17 remember that "this physical is private and what happens in here stays in here and is nobody
18 else' business," and Dr. Pope continued to stroke H. G.'s penis.

19 55. Dr. Pope then put H.G.'s penis in his mouth and began sucking on it. Dr. Pope
20 continued until H.G. ejaculated in Dr. Pope's mouth and on his face.

21 56. Dr. Pope then told H.G. to "return the favor," stood up, unbuckled his pants,
22 took his penis out and let his pants fall to the ground. H.G. refused. Dr. Pope then asked H.G.,
23 "you don't want to go to solitary confinement, do you?" H.G. said no. Dr. Pope then ordered
24 H.G. to bend over again and said that H.G. would "like this better."

25 57. Dr. Pope, who was muscular and over 6'2" tall, forced H.G. to bend over again.

1 Dr. Pope put lubricant on H.G.'s anus, pressed his body against H.G. and began to insert his
2 penis into H.G.'s anus. Dr. Pope then reached around H.G., grabbed his penis, and started
3 stroking it, saying "I told you you would like it." Dr. Pope shoved his penis in and out of
4 H.G.'s anus for several minutes, until he ejaculated inside H.G.

5 58. Dr. Pope then helped H.G. clean up, told him to put on his clothes, gave him
6 some candy, and told him, "remember, what happens in here stays in here between us. Don't
7 tell anyone, or you will be sent to solitary confinement."

8 59. About two weeks later H.G. was called back to Dr. Pope's office for a follow-
9 up. Dr. Pope raped and abused H.G. again in a similar manner. This happened one more time
10 before H.G. was released from Green Hill.

11 60. Within a year, H.G. was back at Green Hill for his second commitment, and he
12 was called back to Dr. Pope's office three more times. During each of these visits, Dr. Pope
13 raped and abused H.G. in a similar manner.

14 **F. Plaintiff N.S.**

15 61. Plaintiff N.S. was placed at Green Hill School from about 2006 through 2011.
16 He was 14 years old when he arrived.

17 62. During the initial intake N.S. was told by other residents that he had to be seen
18 by "Dr. Sticky Fingers." N.S. was nervous about this and asked questions but got no answers as
19 to the meaning of this nickname. While he was being escorted to medical for an exam, in
20 handcuffs, N.S. was instructed by the guard who was escorting him that he was to "follow all
21 directions and not ask any questions."

22 63. N.S. was examined by Dr. Pope who inserted at least one of his fingers into
23 N.S.' rectum without a glove and then gave N.S. "Jolly Rancher" candies after the exam.

24 64. N.S. was also sexually abused on several occasions by Counselor Michele.
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1 **G. Plaintiff C.S.**

2 65. Plaintiff C.S. was placed at Green Hill School in 2009, when he was 17 years
3 old.

4 66. C.S. was at his bunk when he was called out for his physical. Other kids said
5 that he was about to see “Dr. Freak.” When a tall, muscular black guard escorted C.S., in
6 handcuffs, to Dr. Pope’s office, he told C.S. to “Cooperate. Do everything the doctor tells you
7 to do, and you’ll be fine.”

8 67. After the guard uncuffed C.S. and left the office, he stayed right outside the
9 door.

10 68. Dr. Pope introduced himself, said he would do a physical, and that C.S. needed
11 to cooperate. He asked C.S. to undress completely.

12 69. Dr. Pope started the physical by rubbing C.S.’s chest without a stethoscope.
13 Then he asked C.S. to spread his legs and he grabbed C.S.’ testicles and penis in his left hand
14 for what seemed a long time and then stroked C.S’ penis 5–6 times until it became erect. Dr.
15 Pope inserted at least one finger of his right hand into C.S.’ anus while he continued to stroke
16 C.S.’s penis and C.S., who was suddenly confused about his sexuality, ejaculated. “It works
17 great!” said Dr. Pope.

18 70. After wiping C.S off with a paper towel, Dr. Pope told C.S. to put his clothes on
19 and offered him a handful of Jolly Rancher candies. Dr. Pope knocked on the door, and the
20 guard came right in, eating a Jolly Rancher.

21 71. A couple of days later the large guard returned to C.S.’s bunk and said that the
22 doctor wanted to see him for an appointment. “I don’t want to see the doctor,” C.S. told him.
23 The guard said “well, you got to see the doctor. You are rebelling against authority.”

24 72. C.S. went to eat chow and returned to his bunk, where a group of guys jumped
25 him and beat him, bruising his back—which required a medical visit. Dr. Pope did not digitally
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1 penetrate C.S. during this visit, but he used the opportunity to rub C.S.' testicles and stroke his
2 penis. When he was leaving the office, Dr. Pope told C.S., "it's not good to refuse to follow the
3 rules."

4 73. The guard took C.S. back to his bunk where he covered his head and balled up.
5 He was beaten up two more times.

6 **H. Plaintiff B.L.**

7 74. Plaintiff B.L. ("Big B") was placed at Green Hill School in 2010, when he was
8 15 years old and 6'4". He was taken in cuffs to see Dr. Pope on his first day at Green Hill.

9 75. After the guard stepped outside, Dr. Pope introduced himself and said "Hey, I'm
10 Dr. Pope I'm here to help you pass your physical exam. Just do exactly as I say, and you'll be
11 out of here in no time." After taking L.B.'s weight and blood pressure, Dr. Pope asked L.B. to
12 take off his jumpsuit, and then he told L.B. that he should also take off his briefs.

13 76. Sitting in his exam chair, Dr. Pope rolled up to L.B. and grabbed his scrotum
14 with his large right hand and grabbed L.B.'s penis with his left hand. He instructed L.B. to turn
15 to the right and cough, then turn to the left and cough. Dr. Pope laughed and said he had "never
16 seen a dick that big." Then he started to stroke L.B.'s penis, and he told L.B. that he had to
17 remain very still, so he could determine the test results. Dr. Pope continued to stroke L.B.'s
18 penis 10–11 times with his large hands, while making a grunting, groaning noise.

19 77. Dr. Pope told L.B. to turn around, bend over and spread his legs. L.B. asked, "all
20 this, for a physical?" Dr. Pope said, "yeah, it's not personal, it's physical," and he used both of
21 his hands to spread L.B.'s buttocks and he stuck his nose into L.B.'s anal cleft. L.B. reacted by
22 clenching his cheeks around Dr. Pope's nose, and he pushed back. Dr. Pope explained to L.B.
23 that he needed to check for cancerous bumps around his anus, and he told him to turn back
24 around.

25 78. When L.B. turned around, Dr. Pope grasped his penis with both hands and
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1 pulled on it again and again. L.B. pushed back and asked Dr. Pope what he was doing. Dr. Pope
2 told him, “good thing you pushed back because you were about to explode.” Dr. Pope told L.B.
3 to put his clothes on, gave him a cherry Jolly Rancher, and called for the guard, who cuffed
4 L.B. and returned him to his cell.

5 **I. Plaintiff J.F.**

6 79. Plaintiff J.F. was placed at Green Hill School in 2010, when he was 16 years
7 old.

8 80. During his initial intake, J.F. was told by other residents that he had to be seen
9 by “Dr. Sticky Fingers.” J.F. didn’t understand the meaning of this nickname until he was
10 molested by Dr. Pope.

11 81. While he was being taken to Dr. Pope’s office in handcuffs, J.F. was instructed
12 by the guard escorting that he was to “follow all instructions.”

13 82. J.F. was examined by Dr. Pope, who massaged J.F.’s testicles and then shoved
14 his huge bare fingers into and out of J.F.’s rectum, causing extreme pain. After he was finished
15 with the “exam,” Dr. Pope told J.F. he’d done a “great job,” and gave J.F. a handful of candies.

16 83. J.F. was also sexually abused on several occasions by a Counselor Liz in a
17 supply closet, and in other locations. When J.F. tried to report that he had been sexually abused,
18 he was punished by staff—left naked in his cell without a blanket, placed into solitary
19 confinement, and sent to Naselle Youth Camp.

20 84. During his stay at Green Hill, J.F. was inadequately protected from harm, and as
21 a result he was choked unconscious and raped in a side closet by another inmate who was
22 known to be a violent sexual predator.

23 **J. Plaintiff Z.T.**

24 85. Plaintiff Z.T. was placed at Green Hill School from about 2011–2012, when he
25 was 16 years old.

1 86. Shortly after Z.T. arrived at Green Hill School, he was ordered to have a
2 mandatory physical examination. During this exam, using gloves and lubrication Dr. Pope
3 fondled Z.T.'s genitals and stuck one, and then two huge fingers into Plaintiff's rectum, going
4 in and out, while Z.T. lay on his side on the exam table.

5 87. A few weeks later Z.T. was told that he had to go back to see Dr. Pope for a
6 "follow-up" appointment. This time Z.T. was told to bend over the exam table while Dr. Pope
7 inserted one, then two, and then *three* fingers into Z.T.'s anus. It hurt very much and lasted
8 about a minute. When Z.T. started to flinch, Dr Pope instructed him not to move, or they would
9 have to start the process again.

10 **K. Plaintiff A.Q.**

11 88. Plaintiff A.Q. was placed at Green Hill School between approximately 2013
12 through 2014. He was about 16 years old when he arrived.

13 89. During A.Q.'s mandatory intake physical exam, Dr. Pope played with the
14 foreskin of A.Q.'s penis, and with his testicles, pushing A.Q.'s testicles inside his body. Dr.
15 Pope inserted two fingers into A.Q.'s anus using a glove and lubricant and was moving them in
16 and out and around and around for about 10–15 seconds when A.Q. jumped forward and said
17 they were done. Dr. Pope called the guard in to take A.Q. back to his bunk.

18 90. The second time A.Q. had to see Dr. Pope was for a broken nose, and nothing
19 unusual happened.

20 91. The third time that A.Q. had to see Dr. Pope followed a parole violation, and Dr.
21 Pope seemed excited to see him. Dr. Pope caressed A.Q.'s scrotum while he stroked A.Q.'s
22 penis for about 45 seconds, as if he were trying to masturbate A.Q. Dr. Pope put his fingers in
23 A.Q.'s anus without gloves, going in and out, when A.Q. pushed forward, turned around, saw
24 that Dr. Pope was not wearing gloves, and asked what Dr. Pope was doing. "I'm just doing
25 your physical, don't get upset." Dr. Pope told A.Q. that he was free to go.

1 92. A.Q. reported this incident to his counselor Bradley Williamson, who was
2 preparing A.Q.'s release plan.

3 93. Around the Fall of 2014, A.Q. had to return to Green Hill and had to see Dr.
4 Pope for another physical exam. When Dr. Pope caressed and fondled A.Q.'s testicles, he told
5 A.Q. to cough, so it appeared that he was checking for a hernia. Dr. Pope then repeatedly
6 inserted at least one of his fingers into A.Q.'s rectum, and then pulled them out.

7 **L. Plaintiff N.D.**

8 94. Plaintiff N.D. was placed at Green Hill from 2015 through 2017. He was about
9 16 years old and 130 lbs. when he arrived.

10 95. Dr. Pope grabbed N.D.'s penis and scrotum during N.D.'s mandatory physical,
11 and probed N.D.'s perineum, and told N.D. that something didn't feel right. Dr. Pope ordered
12 N.D. to bend over the exam table, he put on gloves and lubricant on his the fingers of his right
13 hand, and then he touched N.D.'s anus. N.D. jumped and said he didn't want to do this. Dr.
14 Pope told him it was normal, and everybody had to get this done when they come in Green Hill.
15 And because he felt a lump, "it was mandatory." He told N.D. to bend over, and Dr. Pope
16 inserted at least one of his huge fingers into N.D.'s anus and moved it around, causing N.D. to
17 cry out, and causing tears to come from his eyes.

18 **M. Plaintiff C.M.**

19 96. Plaintiff C.M. was placed at Green Hill School in 2020. He was 17 years old
20 when he arrived and was called out to see Dr. Pope on his third day at Green Hill. A large,
21 muscular guard named Brandon (last name unknown), with tattooed arms and curly hair, cuffed
22 C.M. and told him he had to go to medical, where the nurse would take his vitals. After C.M.'s
23 vitals were taken, Brandon re-cuffed C.M and took him down the hall to Dr. Pope's office and
24 warned C.M. to "follow instructions and do what he was told."

25 97. Brandon uncuffed C.M. and left the office, shutting the door behind him, leaving
26
27

1 Dr. Pope alone with C.M., and standing guard just outside the door. Brandon's nicknames at
2 Green Hill were "Asshole" and "Dickhead." His reputation for sadism was communicated by
3 veteran Green Hill residents to new residents for their protection.

4 98. Dr. Pope told C.M. to pull down his jumpsuit to check for cancer in the bladder
5 area and scrotum. Holding C.M.'s scrotum, Dr. Pope grabbed C.M.'s penis and started tugging
6 it. When he saw no enlargement of C.M.'s penis after stroking it four times, Dr. Pope stopped
7 and ordered C.M. to turn around and bend over.

8 99. Mindful of Brandon's warning that he had to follow instructions ("or else..."),
9 C.M. complied. Dr. Pope inserted two fingers into C.M.'s rectum, moved them in and out a
10 number of times, and repeatedly curled them to stimulate C.M.'s prostate. C.M. asked Dr. Pope
11 if this was a normal procedure when checking for bladder cancer, and Dr. Pope told him it was.
12 After a while, Dr. Pope stopped and told C.M. to put his clothes back on. Dr. Pope offered
13 C.M. a bowl of grape Jolly Ranchers and told him to take as many as he wanted.

14 100. Dr. Pope called out, "guard," and Brandon came right in and cuffed C.M. When
15 Brandon returned C.M. to his living quarters and uncuffed him, the other residents mocked
16 C.M. and said that he must have just seen "Dr. Sticky Fingers." Humiliated, and realizing that
17 an admission to having been sexually violated would likely subject him to physical harm, C.M.
18 replied, "I don't know what you're talking about, I just had the nurse take my vitals."

19 101. Following this "physical," on four more occasions, C.M. was told by a guard
20 that he had to go to medical. On each occasion he refused to go, and he was sent to solitary
21 confinement each time, for at least a week.

22 **N. Plaintiff B.M.**

23 102. Plaintiff B.M. was placed at Green Hill School in 2020. He was 17 years old
24 when he arrived.

25 103. B.M. was met at his bunk on his second day at Green Hill by an attractive,
26

1 brown-skinned female guard (about 5'4") who cuffed him and escorted him to the nurse station
2 to have his vitals taken. The nurse was an older Caucasian lady with grey hair. After B.M.'s
3 vitals were taken, the guard re-cuffed B.M. and escorted him down the hallway to Dr. Pope's
4 office, cautioning B.M. to "do what Dr. Pope says."

5 104. After uncuffing B.M. in Dr. Pope's office, the guard left the room, closing the
6 door behind her, and she waited in the hallway outside the door.

7 105. Dr. Pope told B.M. to take off his clothes and then reached forward to grab
8 B.M.'s scrotum, and started manipulating his testicles, telling B.M. to cough. Dr. Pope pulled
9 back the foreskin of B.M.'s penis, and pulled on the penis about seven times, squeezing it.

10 106. Dr. Pope ordered B.M. to spread his legs and bend over the exam table. Dr. Pope
11 spread the cheeks of B.M.'s buttocks and pressed his left thumb against B.M.'s anus, without
12 using lubricant. Dr. Pope instructed B.M. to cough several times, and when B.M. coughed, Dr.
13 Pope inserted his thumb, which was the size of a pickle, into B.M.'s anus, deeper and deeper.
14 When B.M. recoiled from the pain, Dr. Pope told him to stop moving, or he'd fail the physical.

15 107. When Dr. Pope shoved his thumb deep inside, B.M. cried out, "Aaah! I got a
16 doo-doo!" B.M. turned around, reflexively balled his fists and said, "Motherfucker!" Dr. Pope
17 yelled out "Guard!!" When the guard came right in the door, Dr. Pope instructed her to
18 "restrain him!" The guard then cuffed B.M. and walked him out the door. Dr. Pope did not
19 offer B.M. any candy.

20 108. On the way down to B.M.'s bunk the guard told him, "That can get you in more
21 trouble. Behave."

22 **O. Plaintiff M.A.**

23 109. Plaintiff M.A. was placed at Green Hill School in 2020. He was 17 years old
24 when he arrived.

25 110. M.A. was met at his bunk on his first day at Green Hill by a brown-skinned
26

1 guard known as "Sergeant J," who took M.A. to the nurse's station to have his vitals taken. The
2 nurse was a black-skinned woman of about 30, with long black hair. After his vitals were taken,
3 M.A. was re-cuffed and taken down the hallway to Dr. Pope's office. The guard told M.A. that
4 his exam should only take about 20 minutes, and that M.A. should just follow Dr. Pope's
5 instructions, and "do everything he says to do." M.A., who had taken physicals before, thought
6 that was a strange thing for the guard to tell him.

7 111. After uncuffing M.A. and before leaving the office and closing the door behind
8 him, Sergeant J told Dr. Pope "I'll be outside the door." After telling M.A. that he would be
9 checking for cancer and instructing him to drop his drawers, Dr. Pope started squeezing M.A.'s
10 testicles and pulling on his penis. M.A. asked why he had to do that to check for cancer. Dr.
11 Pope told him that he needed M.A.'s penis to be hard for him to check. Dr. Pope started
12 massaging M.A.'s testicles and pulled on his penis about 10–15 times. M.A.'s penis got hard
13 and released some liquid.

14 112. Dr. Pope asked M.A. to bend over the exam table so that he could check for
15 prostate cancer. M.A. told Dr. Pope that he thought that prostate cancer was only for men over
16 50. Dr. Pope said "no, this is a normal protocol," and it would only take a few minutes. Pope
17 told M.A. to hold his breath as he inserted two or possibly three fingers into M.A.'s anus
18 without a glove or lubrication. After Dr. Pope had gone in and out and around and around two
19 times, M.A. said, "This don't feel right. This don't feel right. I feel violated." M.A. started
20 "freaking out," turned around and backed up, causing Dr. Pope's fingers to pop out. Dr. Pope
21 sounded panicked when he said, "Guard!" The guard came right in while M.A.'s pants were
22 down, and he held M.A. around the shoulders, telling him to calm down. The guard stood
23 between M.A. and Dr. Pope, to protect Dr. Pope from M.A.

24 **P. Further Allegations**

25 113. Dr. Pope, a Green Hill medical care provider, was responsible for nurturing and
26

1 protecting the Green Hill residents, including protecting them from sexual abuse and
2 exploitation. Plaintiffs were entrusted to the care of Dr. Pope—indeed they were *required* to be
3 examined by him—who instead took advantage of his position of power to abuse them.

4 Defendants knew or should have known that Dr. Pope was sexually abusing these Plaintiffs.

5 114. Dr. Pope abused his position of power by using his private, invasive medical
6 examinations as an opportunity to fulfill his perverse desires to sexually abuse vulnerable
7 juvenile boys. Dr. Pope misrepresented to Plaintiffs that he was performing routine medical
8 examinations when he was instead sexually abusing Plaintiffs through sexual fondling, digital
9 penetration, and anal and oral rape.

10 115. Defendants knew or should have known of a history of reports of sexual
11 misconduct perpetrated by Green Hill School staff, including Dr. Pope, upon the residents.
12 Investigations of these allegations were inadequate and were quickly closed. The policies and
13 procedures adopted by Defendants for these cursory investigations were inadequate to find
14 misconduct, as evidenced by the dismissal or disregard of sexual abuse reports against Green
15 Hill School.

16 116. The manner in which these claims of abuse were handled by Green Hill School
17 staff did not change even after the criminal convictions of Green Hill School staff for sexual
18 abuse of the residents of Green Hill School dating back decades.

19 117. Upon information and belief, Defendants ignored evidence of sexual abuse of
20 youth at Green Hill School by staff. This indifference included a failure to report mandatorily
21 reportable incidents of PREA violations and abuse of Green Hill School residents. The manner
22 in which the Green Hill School authorities responded to reports of sexual victimization of
23 Green Hill School residents resulted in a culture of permissiveness and indifference to claims of
24 abuse. This resulted in the repeated victimization of Plaintiffs and other residents.

25 118. Defendants were negligent in their hiring, monitoring, and supervising of both
26

1 their staff and residents by allowing sexual predators to have unlimited, unsupervised access to
2 vulnerable children at Green Hill. Green Hill staff used their position of power to intimidate
3 vulnerable children placed there in order to sexually abuse and exploit its residents, including
4 Plaintiffs.

5 119. Defendants continuously engaged in a pattern of conduct designed to cover-up
6 the ongoing sexual abuse and sexual exploitation at Green Hill School to which Green Hill
7 School residents, including Plaintiffs, were repeatedly subjected to.

8 120. As a direct and proximate cause of Defendants' conduct, Plaintiffs suffered
9 physical, emotional, and psychological trauma, leading to significant anguish and distress that
10 they will be forced to live with for the rest of their lives.

11 VI. CAUSES OF ACTION

12 COUNT I – COMMON LAW NEGLIGENCE 13 AS TO ALL STATE DEFENDANTS (Washington Common Law)

14 121. Based on allegations set forth in Part V, above, State Defendants had a duty to
15 exercise ordinary care and refrain from negligent acts and omissions, a duty that arose out of a
16 special relationship, custodial control, and investigations of referrals, as well as a gratuitous
17 undertaking.

18 122. These duties that included the duty to refrain from negligently placing children
19 in a situation that will foreseeably cause grave harm, duties that included the legal obligation to
20 fully investigate all referrals, duties to act reasonably after assuming a gratuitous undertaking,
21 and duties that included the necessity of taking reasonable precautions to protect Plaintiffs from
22 sexual abuse and neglect, as well as duties to refrain from negligent acts and omissions in the
23 hiring, training, supervising, and retaining of employees.

24 123. Defendants' multiple breaches of their duties owed proximately caused the
25 sexual abuse of Plaintiffs and resultant damages for which Defendants are liable.

1 **COUNT II – GROSS NEGLIGENCE**
2 **AS TO ALL STATE DEFENDANTS**
3 **(Washington Common Law)**

4 124. Based on the allegations set forth in Part V, above, State Defendants had a duty
5 to exercise at least slight care and refrain from negligent acts and omissions, a duty that arose
6 out of a special relationship, custodial control, and investigations of referrals, as well as a
7 gratuitous undertaking.

8 125. These duties included the duty to refrain from negligently placing children in a
9 situation that will foreseeably cause grave harm, duties that included the legal obligation to
10 fully investigate all referrals, duties to act reasonably after assuming a gratuitous undertaking,
11 and duties that included the necessity of taking reasonable precautions to protect Plaintiffs from
12 sexual abuse and neglect, as well as duties to refrain from negligent acts and omissions in the
13 hiring, training, supervising, and retaining of employees.

14 126. Defendants’ multiple breaches of their duties owed proximately caused the
15 sexual abuse of Plaintiffs and resultant damages for which Defendants are liable.

16 **COUNT THREE – §302B NEGLIGENCE**
17 **AS TO STATE DEFENDANTS**
18 **(Washington Common Law)**

19 127. Based on the allegations set forth in Part V, above, Defendants had a duty to
20 avoid exposing Plaintiffs to harm from the foreseeable conduct of a third party under
21 Restatement (Second) of Torts §302B and Washington common law, a duty that arose out of a
22 special relationship, a duty that included the duty to protect Plaintiffs against the criminal acts
23 of third parties

24 128. State Defendants breached their duties owed to Plaintiffs due to their multiple
25 failures, as alleged in Part V, above, all of which proximately caused the sexual abuse of
26 Plaintiffs and resultant damages for which State Defendants are liable.

1 **COUNT FOUR – SEXUAL BATTERY**
2 **AS TO DR. ISAAC POPE**
3 **(Washington Common Law)**

4 129. Based on the allegations set forth in Part V, above, Dr. Isaac Pope sexually
5 battered each Plaintiff.

6 130. As a result of Dr. Pope’ sexual battery, each Plaintiffs was damaged in an
7 amount to be proven at trial.

8 **COUNT FIVE – INTENTIONAL INFLICTION OF EMOTINAL DISTRESS**
9 **AS TO STATE DEFENDANTS**
10 **(Washington Common Law)**

11 131. Based on the paragraphs set forth and alleged in Part V, above, State Defendants
12 intentionally and/or recklessly engaged in extreme and outrageous conduct that caused severe
13 emotional distress to Plaintiffs.

14 132. State Defendants are liable for Plaintiffs’ damages proximately caused by their
15 actions.

16 **COUNT SIX – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**
17 **AS TO STATE DEFENDANTS**
18 **(Washington Common Law)**

19 133. Based on the allegations set forth in Part V, above, the Defendants’ conduct
20 constituted negligent infliction of emotional distress.

21 134. State Defendants are liable for Plaintiffs’ damages proximately caused by their
22 actions.

23 **COUNT SEVEN – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
24 **AS TO DR. ISAAC POPE**
25 **(Washington Common Law)**

26 135. Based on the allegations set forth in Part V, above, the conduct of Defendant
27 Isaac Pope constituted extreme and outrageous intentional and/or reckless conduct that caused
severe emotional distress to Plaintiffs.

1 136. Dr. Pope is liable for Plaintiffs' damages proximately caused by his actions.

2 **VII. RESERVATION OF RIGHTS**

3 137. Plaintiffs reserve the right to assert additional claims as may be appropriate
4 following further investigation and discovery.

5 **VIII. JURY DEMAND**

6 138. Plaintiffs demand that this case be tried to a jury.

7 **IX. PRAYER FOR RELIEF**

8 139. Plaintiffs respectfully request the following relief:

9 A. That the Court award Plaintiffs appropriate relief, to include all special
10 and general damages established at trial.

11 B. That the Court enter such other and further relief as the Court may deem
12 just and proper.

13
14 (Remainder of page intentionally left blank.)
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1 Respectfully submitted this 19th day of October 2025.

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EXHIBIT 1

Deposition of Isaac Pope, M.D

C.H., et al. v. State of Washington, DSHS, et al.

January 5, 2021



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SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR PIERCE COUNTY

C.H., an individual; S.H.,)
an individual; C.S., an)
individual; M.W., an)
individual; S.K., an) No. 18-2-12594-0
individual; J.C., an)
individual; J.P., an)
individual; N.H., an)
individual; R.O., an)
individual,)
Plaintiffs,)

vs.)

STATE OF WASHINGTON,)
DEPARTMENT OF SOCIAL AND)
HEALTH SERVICES, JUVENILE)
REHABILITATION)
ADMINISTRATION, GREEN HILL)
SCHOOL, governmental)
entities,)
Defendants.)

VIDEOCONFERENCE VIDEOTAPED DEPOSITION UPON ORAL

EXAMINATION

OF

ISAAC POPE, M.D.

Taken at Chehalis, Washington

DATE TAKEN: JANUARY 5, 2021

REPORTED BY: LAURA L. OHMAN, RPR, CCR 3186

1 A P P E A R A N C E S

2 (ALL PRESENT APPEARING VIA VIDEOCONFERENCING)

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19
20 ALSO PRESENT: Albert Maimon, videographer

21 * * * * *

1 screen?

2 A. Yes.

3 Q. Okay. So this is a July 9, 2019, report by the
4 Chehalis Police Department, victim's name Mathew
5 Watkins, suspect, Isaac Pope.

6 Do you see that?

7 A. Yes.

8 Q. Okay. So this is a four-page report, and so you
9 have no recollection of you being informed that this
10 case was referred to the Chehalis Police Department?

11 A. No. I was not aware of that.

12 Q. Okay. So do you know whether you were contacted
13 by the Chehalis Police Department because of --

14 A. To my knowledge, I was not --

15 Q. -- because of the allegations made by
16 Mr. Watkins?

17 A. I was not -- to my knowledge, in recollection, I
18 was not contacted by the Chehalis Police Department.

19 Q. Okay. And so on page 1 of this report, it
20 mentions that a Jennifer Redman was the Green Hill
21 superintendent.

22 Is that your understanding as to who the
23 superintendent was in 2019?

24 A. Yes.

25 Q. Okay. And so do you know whether Jennifer

1 Redman contacted you after 2019 about these allegations
2 made against you?

3 A. She -- Jenni- -- after she was -- she notified
4 me that these allegations was made and gave me a letter
5 that stated that I was not to do a physical exam unless
6 I had a nurse in attendance.

7 Q. So Ms. Redman gave you that letter?

8 A. Yes.

9 Q. Do you have a copy of that letter?

10 A. Yes. Let me -- oh... (Pause.)

11 Q. So, Dr. Pope, maybe you can -- when you get a
12 copy of that letter, you can share it with your attorney
13 so they can share it with my firm --

14 A. Okay.

15 Q. -- if she agrees to that.

16 MR. BROWN: Ms. Atkins or Ms. Croft, would
17 one of you be willing to share the letter that Dr. Pope
18 is referencing?

19 MS. CROFT: Yes. I'm not aware of the
20 letter, and so I could certainly ask Ms. Redman for it.

21 MR. BROWN: Okay. Thank you.

22 BY MR. BROWN:

23 Q. And so after Ms. Redman advised you not to do
24 those exams, did she terminate your contract with Green
25 Hill School?

1 A. No.

2 Q. Did anyone from CPS, DSHS, DCYF, JRA attempt to
3 terminate your contract?

4 A. Not to my knowledge.

5 Q. Okay. And so by the way, your contract, did you
6 have a -- was it an annual contract, or was it every two
7 years?

8 A. I initially had a contract for every two years.
9 In the last couple of years, I asked for only a year at
10 a time because I was planning on retiring. And -- and I
11 discussed with them to make it a planned retirement and
12 give them time to get -- hire someone to replace me, and
13 when that happened, I retired on September the 30.

14 Q. Okay. And so back in 19- -- I believe it was
15 '81 to 2002, is that when you had a -- when you
16 maintained a two-year contract, or when did you switch
17 to a one-year contract?

18 A. My -- my contracts varied. It -- and my
19 contracts went to -- went for a while with one year,
20 then they went back to two year, and then back to one
21 year in 1999.

22 Q. Okay. And did you negotiate the terms of your
23 contract with anyone?

24 A. Not since the beginning. They remained the
25 same.

CERTIFICATE

STATE OF WASHINGTON
COUNTY OF KING

I, Laura L. Ohman, a Certified Shorthand Reporter in and
for the State of Washington, do hereby certify that the
foregoing transcript of the deposition of ISAAC POPE, M.D. having
been duly sworn, on January 5, 2021, is true and accurate to the
best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal
this 12th day of January, 2021.



LAURA L. OHMAN, RPR, CCR 3186



My commission expires:
MARCH 2021