



Appellate Court Affirms Constitutionality of Minnesota's Civil Commitment Program

Appeals Court hands setback to civil detainees who sued over detention

By Chris Serres, Star Tribune

January 4, 2017

A federal appeals court in St. Louis has declared that Minnesota's sex offender treatment program is constitutional — handing a major victory to the state but potentially derailing long-awaited reforms to its system of indefinite detention for sex offenders.

In a decision released January 3, a three-judge panel of the Eighth Circuit Court of Appeals reversed a lower-court ruling and found that Minnesota's system of committing sex offenders beyond their prison terms serves a "legitimate interest" in protecting citizens from dangerous sexual predators.

The ruling is a major setback for civil rights attorneys and a host of lawmakers who have spent much of the past five years pressing for reforms that would put offenders on a faster path toward release from the Minnesota Sex Offender Program (MSOP). The appellate panel essentially has given Minnesota's program a clean bill of health, relieving immediate pressure on state officials to make major reforms to a program that has long been criticized as inhumane. A class of sex offenders sued the state in 2011, arguing during a prolonged trial that Minnesota's system violated their due-process rights under the U.S. Constitution by depriving them of access to the courts and other basic safeguards found in the criminal justice system.

But after reviewing the program and state law, the appeals court sided with the state, concluding that Minnesota provided adequate constitutional protections, including the right to petition for release.

"We conclude that the class plaintiffs have failed to demonstrate that any of the ... arguable shortcomings in the MSOP were egregious, malicious, or sadistic as is necessary to meet the conscience-shocking standard," the Eighth Circuit panel ruled.

721 -- Number confined in Minnesota's sex offender program

89 -- Nearing approval for conditional release

\$89.7 million -- Annual budget for fiscal year, 2017

\$124,000 -- Estimated annual cost per MSOP client

Source: Minnesota Department of Human Services

Reached afterward, the plaintiffs' lead attorney said the appellate judges used too narrow a standard for reviewing his clients' due-process claims, and said he is considering an appeal to the U.S. Supreme Court, which must be filed within 90 days.

"Justice was not done today," said attorney Dan Gustafson. "We're still considering what we are going to do, but, as Gov. Dayton said the other day, we are not going quietly into the night." Among detainees at the MSOP's campus in St. Peter, the ruling was met with "a mix of despair and anxiety," said Benjamin Alverson, 41, a sex offender who has been at the MSOP for more than 11 years. Word of the ruling spread through the campus just before noon as clients were heading to the cafeteria for lunch, he said. "There is a feeling that we should just give up, because now we're never getting out," he said. "There were a lot of heavy sighs."

Minnesota has long stood out among the states for both the number of people referred to as sexual predators it commits and for the duration of their confinement without review. During a federal trial in 2015, MSOP administrators admitted they may be detaining untold numbers of offenders who no longer meet the statutory criteria for confinement.

In a history spanning more than 20 years, the MSOP has granted conditional discharge to only 14 offenders. Only one person, a 26-year-old confined for sexual acts he committed as a juvenile, has been fully discharged from MSOP, and that did not occur until August of this year.

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From the Editor's Desk

By Wayne Bowers

My advocacy with this program began in 1993. Before issues in my life were out of control, I was in the journalism field. I've seen lots of serious structures and guidelines placed on people with a sex offense charge. I've heard of prison types of all kinds – from good programming to none at all. I've seen a movement to less counseling and programming to more warehousing due to legislative philosophies that programs are ineffective and serious budget limitations and corrections always gets short-changed. I've seen how this field of sex offending has taken on the industrial prison complex just as other aspects of criminal justice have done so.

Whereas in this day of a growing push for reductions in prison numbers and revising of criminal justice procedures, I don't see any move to reduce harsh sentences placed on a considerable number of people with sex offenses. Many states have added an 85 percent minimum for consideration of release on top of lengthy sentences in the first place. The thought of promoting counseling to change behavior has not been emphasized anymore on a major scale. And to be honest, with the huge scrutiny on a person with such paraphilia, legal advice to wait until after imprisonment for counseling makes a lot of sense.

But the most astounding part of all the elements of sexual offense issues is the civil commitment concepts in 21 states, the federal system and the District of Columbia. If you are not aware, civil commitment is a concept in these jurisdictions where a person is held beyond their regular sentence on the premise they may re-offend. Process to hold a person like this varies in each state to a committee hearing to a judge making the decision. A hearing period is then assigned on a regular basis to gauge if the person has become "safe" to allow to leave. Therapy programs are supposed to help these people move toward a release in the future.

This is where I have a total complaint with the entire system. Each of these people should have been in therapy programs in their regular prison terms. And the lack of a safety concept to allow such therapy for prisoners, in my mind, it is the failure of the prison system that people must be held beyond the sentence for these reasons. No doubt there will be some people who don't profess to make any change in their thinking and it is understandable to feel like holding such a person. One long-time member of SORT has constantly pushed for "sex offender camps" where the entire facility houses people with a sex offense and with a more positive atmosphere to receive counseling. There are some prison programs that meet this concept

Through correspondence with people in a considerable number of these civil commitment facilities and with advocates in those states, there is a concerning similarity to each of them. If I hear from a person held or a family member describe the concept of that facility and the surroundings, it is very close to information about any other of the civil facilities.

Health care assistance in these programs is large and the approach to some who are elderly or handicapped is totally unacceptable and in my mind, are abusing the Civil Rights concepts of the Justice System. Facility inadequacies in many of the locations causes large difficulties for residents. I have heard of a med distribution for the residents being in an area where a handicapped person can't make it. The atmosphere is one of

despair in these facilities as so few people are moved through the program to a release. Some that do gain release on a controlled basis are so limited that the person feels like returning to prison would be better. And some do so.

Though I'm sure there are some staff who work well with these residents, I hear of terrible examples of disrespect and disregard – much more than a common occurrence in the prisons. My concept on this is the fact these people have been judged – by some process – to be so dangerous that they may reoffend. In other words, they are looked at as the worst of the worst. I hate to say that as I communicate with quite a few of these folks who are ready to move forward with their lives but the system keeps them. This is a horrible blight on our criminal justice system. This country has no right to question and challenge civil rights issues of other countries when we are being so abusive in this process and hiding behind the fact the Supreme Court upheld a case back in 1997 that civil confinement is constitutional.

Constant complaints and difficulties abound in the counseling that is given. Some go through a constant revolving door process with therapists and each change of therapist or program director leads to beginning the program over.

Getting information on these programs is difficult and the fact they all are placed under their department of health or some similar title and not in the corrections system, all information on residents is limited in release due to HIPPA rules. Whereas there is a scrutiny on prisons and jails throughout the nation through the American Correctional Association and its auditing and evaluation process, there is no such scrutiny of civil commitment programs. It is like pulling teeth to get information.

With CURE, we hold a monthly conference call open to all the various facilities, residents who can call and to advocates and family members. Some states are developing good coalition programs to challenge the process. But far more scrutiny is needed. These programs are unbelievably expensive for each resident and the public needs to be aware of the cost of these programs when such a very few people are released. You are welcome to join this call. The number to call in is 712-432-0460 and then the connect code is 663535#. The call begins at 10:30 a.m. EST and runs for 90 minutes.

Minnesota had a case that ruled their facility unconstitutional in 2015 but that was just overturned in January (see page1) by the 8th Circuit Court of Appeals. Missouri's program was ruled unconstitutional in September 2016 and many appeals still are pending.

There are a few members of the media who are showing an interest in this area and beginning to uncover some of the abuses. There just needs to be a more thorough reporting and uncovering of these programs.

New Year's Day has come and gone but how about your resolutions? Here's one good for life:

**Resolve to be tender with the young,
compassionate with the aged,
sympathetic with the striving, and
tolerant of the weak and the wrong.
Sometime in life you will have been all of these yourself.
Anonymous**

Sex Offender Specific Treatment

By Dr. JoEllen Wiggington
Pacific Professional Associates
Member of CURE-SORT Board

EDITOR'S NOTE: As our mission is to promote the importance of counseling for the recovery of those who have sexually offended, when appropriate, a discussion will be held in our issue along this topic. This is the sixth article in this series. As said, this is a program of Dr. Wiggington and is not available by correspondence.

This is part 6 of an ongoing series dealing with outpatient sex offender specific treatment, with references and workbooks used in my treatment program at Pacific Professional Associates in Los Angeles, CA. In my last column, I introduced the Rational Emotive Behavioral Therapy (REBT) model and four major feelings which can be disruptive when experienced excessively. Prior to discussing irrational beliefs that support emotional over-reacting I need to define three kinds of thinking:

- *Rational thinking* is basically the ability to reason or use common sense and thus see that any situation may have a number of possibilities or outcomes. It includes being sensible, realistic and not defeating. Rational thinking does not reject negative thoughts nor does it support positive thinking as such. Rather, rational thinking attempts to look for what is accurate in a given situation or experience thus allowing for responsible problem solving alternatives.
- *Irrational thinking* is the inability to reason or use common sense. It might be categorized as thinking in narrow and limited ways or the inability to think through a situation logically. Irrational thinking can include illogical, inaccurate, self-defeating and unrealistic thinking.
- *Rationalization* is a form of thinking in which the thinker is attempting to make something appear rational or to conform to reason. It is an attempt to explain away or make more acceptable certain acts, beliefs or desires. This is often done without the realization that these explanations do not hold water, or make very little sense when analyzed rationally. Rationalizations are a way of conning or denying in order to distort reality.

There are numerous commonly held irrational beliefs. For example, one is Fear of Rejection: the belief that one must be liked (loved) and respected (approved) by everyone who one makes significant all the time (and it is awful if one is not). Another is Fear of Failure: One must be thoroughly competent, adequate, and achieving at everything one does (extreme is perfectionism.) A third belief is Fairness: people and things should always turn out the way one wants them to and one should always be treated fairly (and it is awful when either does not happen). And a fourth common irrational belief is Blame/Punishment: if one is rejected, if one fails, or if one is treated wrongly or badly, then someone deserves to be strongly blamed or punished. (Sometimes one should blame or punish themselves because they decide it was their fault.)

Irrational beliefs such as these prevent us from viewing others or situations in a rational way. My next column will present a model to re-structure cognitive distortions that result from irrational thoughts or rationalizations.

CURE-SORT NEWS

CURE-SORT News is a publication of CURE-SORT. SORT stands for Sex Offenders Restored through Treatment. CURE-SORT is one of eight issue chapters of a national criminal justice reform organization known as Citizens United for the Rehabilitation of Errants (CURE), located in Washington, D.C. CURE's address is P.O. Box 2310, Washington, D.C. 20013. For more information on CURE-SORT, send letters to:

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Suggestions for becoming an Advocate to challenge Laws

EDITOR'S NOTE: Helpful topics for readers of our newsletter was discussed at our annual meeting last year. Knowing so many people are angered and frustrated about laws that are impacting their lives, we emphasized that some examples of ways to advocate could be helpful. There are numerous methods to make a point. Writing an article to lawmakers can be one. This article is such an example. Dale of Michigan contacted us with a similar goal. He has written a sample letter aimed to fellow inmates in the Michigan system in hopes they will share with family and friends. "I realize that it is a lofty goal to reach every registrant, but a journey of a thousand miles begins with a single step. For example, if we can reach all 42,000 registrants currently in Michigan alone and each of them can convince two people to send a letter, it will not go unnoticed," Dale says. Here is that sample letter:

Dear elected official (name placed here),

I believe that the sex offender registry is ineffective security theater and amounts to nothing more than pillory.

It is harmful to the person who has paid his or her debt to society.

By branding them with a scarlet letter unlike any other offender leaving the corrections system has to bear, no matter how terrible their offense.

The concept of the registry was built on faulty statistical information. Sex offenders in fact have among the lowest recidivism rates of any offense, yet they receive a life sentence of registration again unlike any other offender. (See figures at end.)

The registry further harms the families by exposing them to undue ostracism and in many cases, hate crime that includes stalking the registrants and killing them.

The registry does more to harm than to protect since many (so called) recidivists in the corrections system are there, not for sex offending, but for violation of the sex offender registry law.

I urge you and your fellow legislators to correct the injustice. (At this juncture, or earlier, inserted could be reference to a specific law to point out.)

The chronically faithful search less for the truth than for justification of a belief system that would be too painful to abandon.

Recidivism Studies

There is a widespread misperception that people who commit sexual crimes do it again and again. The research, however, directly contradicts this. Recidivism rates for sex offenses are relatively low, typically running in the 3-13% range, and among the lowest of all types of crimes.

The largest, most sophisticated analysis was performed by Karl Hanson, Solicitor General of Canada. His 2004 quantitative meta-analysis examined research evidence and recidivism risk factors in a total of 95 studies involving 31,000 sexual offenders with an average follow-up time of 5 years. Hanson's findings include:

- Overall recidivism rate for new sex crimes: 13.7% (Hanson, R.K., and Morton-Bourgon, K, Predictors of Sexual Recidivism: An Updated Meta-Analysis. Public Safety and Emergency Preparedness Canada (2004-2), p.8)

- Recidivism rate for child molestation: 12.7% (Hanson, R.K. and Bussiere, M., Predicting Relapse: A Meta-analysis of Sexual Offender Recidivism Studies, Journal of Consulting and Clinical Psychology (1998) p. 8.)

- Recidivism rate for child molestation within families: 8.4% (Hanson, R.K., Age and Sexual Recidivism: A Comparison of Rapists and Child Molesters, Department of the Solicitor General of Canada (2001-01), p. 9.)

- Recidivism rate for rape: 18.9% (Hanson, Predicting Relapse, p. 8.)

Also released was this study by the U.S. Justice Department:

- A U.S. Justice study released in 2003 shows child molester rearrest rate for new sex crime against a child: 3.3%. All sex offender rearrest rate for new sex crime against a child: 2.2%. Sex offenders were less likely than non-sex offenders to be rearrested for ANY offense – 43 percent of sex offenders versus 68 percent of non-sex offenders. (U.S. Department of Justice, Bureau of Justice Statistics, Recidivism of Sex Offenders Released from Prison in 1994, November 2003, NCJ 198281)

Enthusiasm is one of the most powerful engines of success. When you do a thing, do it with your might. Put your whole soul into it. Stamp it with your own personality. Be active, be energetic, be enthusiastic and faithful, and you will accomplish your object. Nothing great was ever achieved without enthusiasm

Ralph Waldo Emerson

From Appellate Court, Page 1

In June 2015, U.S. Judge Donovan Frank in St. Paul declared the MSOP unconstitutional, citing the program's low rate of release and lack of regular risk evaluations of offenders. While Frank stopped short of closing the program, he ordered state officials to make reforms designed to put less-dangerous offenders on a clearer path toward release. These included independent risk assessments of the roughly 720 offenders confined at secure treatment centers in Moose Lake and St. Peter, and the development of more options for housing offenders in the community. The Eighth Circuit Court had stayed these reforms while Frank's decision was on appeal.

The threat of more radical sanctions, including the possible shutdown of the program and release of hundreds of offenders, acted as a powerful incentive for state officials to make the program less punitive. A record number of detainees at the MSOP have been moved closer toward release, and a total of 89 are now in dormlike settings on the MSOP's St. Peter campus, the final step before release.

However, with the ruling Jan. 3, the MSOP will no longer be under constant pressure to demonstrate that its program is not just a punitive system for segregating offenders, say legal experts.

This is a train wreck for civil rights," said Warren Maas, an attorney who represents sex offenders. "My concern is that staff at MSOP will ... stop working as hard and just say, 'We're going to let these guys sit because it's the easiest thing to do.'"

But in an interview Jan. 3, Human Services Commissioner Emily Piper made it clear that her agency would continue with improvements at the MSOP, including pressing forward with millions of dollars in new infrastructure. In his bonding bill last year, Gov. Dayton sought \$12.4 million to build two facilities to house discharged sex offenders in the community, as well as \$14.5 million to expand housing at a program at St. Peter designed to reintegrate offenders into the community. Dayton also sought funding to conduct more regular assessments of MSOP clients.

For his part, Dayton said that the ruling "means we can continue to make the reforms that we have started at our own pace ... rather than having it be done under a federal directive." While the governor's funding proposals failed last spring, Piper said she anticipates renewing them. "The need still exists. Nothing in this ruling will change the way we operate this program."

Even so, the ruling may reduce pressure on Minnesota and other states to pursue reforms of civil commitment programs that hold offenders beyond their prison terms, said Eric Janus, a law professor at Mitchell Hamline School of Law, St. Paul, and author of a book on sexual predator laws.

This decision will send a signal to states that they don't have to worry too much about the federal courts looking over their shoulders," Janus said. Essentially, the Eighth Circuit has said: We are washing our hands of any kind of meaningful oversight of this kind of post-prison confinement."

Staff writer Ricardo Lopez contributed to this report.

Juarez joins CURE-SORT Board

Frank Juarez of Fresno, CA was added to the CURE-SORT Board in January. Juarez joins with an inside look at what civil commitment entails as he spent just over four years in that system at Coalinga State Hospital after a 10 year prison sentence. To prepare his closure there, he created a Release and Relapse Prevention Plan, which became a model for other men to use to help them communicate their changes to the legal system.

In 2012, Juarez was accepted as a Core member in the restorative justice organization called COSA (Circles of Support and Accountability), based in Fresno, and is the only international sex offender specific support group in the state. After one year as a core member he became a volunteer community support member and met with federal and state offenders to provide encouragement and insight to understand their offending behavior. He works to promote the benefits and the need for this restorative justice support program to be established nationwide.

In 2014, he was elected to the RSOL (Reform Sex Offender Laws) national board, and at the 2014, RSOL Conference held in Dallas, TX he was elected to the office of Secretary. (Due to personal housing issues he removed himself from the board in March 2015).

In response to his efforts to help people back on their feet, he developed Whitefeather Community Release Liaison, and created a unique title for himself of "Community Release Liaison." The liaison develops a Release and Self-Regulation Success Plan, and locates and verifies community resources such as housing, treatment, education, employment, social and religious support, and the long-term goals they need to follow to protect themselves from offending. Since his release he has worked with other men at Coalinga Hospital and in prison on their release plans and preparing them for the state evaluators. Because of his efforts, seven clients were released; two from trial and the others by changing the evaluator's opinion to recommend community release.

His goal and passion is clear; "help offenders understand the depth of their behavior, this causes society, and make a heartfelt decision never to return to that thinking. He wants to educate the public to change the fear and hatred they display toward registrants, he is passionate to reform laws or ordinances that create unneeded restrictions, and networks to build a bridge of restorative justice with other groups or organizations dedicated to helping reintegrate registrants into the community.

Major name change for former RSOL

One of our major advocates has made a name change. Formerly RSOL, the name of the organization is now National Association for Rational Sexual Offense Laws.

This move fits the way we like to approach any conversation about those who once did have a sexual offense or were charged with one. A common statement uses only "sex offender" and we stay away from such a term as that makes a statement that the person is still acting out. In all the research we know of, that is the case for a very low amount of people. And so referring to people as someone who had a sex offense is much more current and more realistic.

We concur with NARSOL in their move.

Polygraph issues continue to surface

Last year polygraph usage came under fire in a decision in the 10th Circuit of Appeals in Denver, CO.

This year, also in Colorado, a substantial discussion to challenge the usage of polygraph, both for its effectiveness and the cost, has been introduced to the Colorado Legislature.

In January, policy by the Association for the Treatment of Sexual Abusers (ATSA) was updated to recommend no usage of polygraph or penile plethysmograph for juveniles under the age of 18 in treatment. The explanation of the move is explained in their adolescent guidelines.

Justices skeptical about Social Media Restrictions

by Amy Howe

At the Feb. 27 Supreme Court oral argument in *Packingham v. North Carolina*, a challenge to a state law that imposes criminal penalties on registered sex offenders who visit social networking sites, Justice Elena Kagan suggested that social media sites like Facebook and Twitter were “incredibly important parts” of the country’s political and religious culture. People do not merely rely those sites to obtain virtually all of their information, she emphasized, but even “structure their civil community life” around them. Justice Ruth Bader Ginsburg echoed those sentiments, telling the North Carolina official defending the law that barring sex offenders from social networking sites would cut them off from “a very large part of the marketplace in ideas.” Kagan was perhaps the most vocal opponent of the law, but by the end of an hour of oral argument it seemed very possible that Ginsburg and at least three of Kagan’s other colleagues would join her in striking down the North Carolina law.

The first half of the oral argument was not entirely smooth sailing for attorney David Goldberg, who argued on behalf of Lester Packingham. Packingham, who was required to register as a sex offender after he pleaded guilty to taking “indecent liberties” with a minor, ran afoul of the North Carolina law when he praised God on Facebook for the dismissal of his traffic tickets. Goldberg complained that the law bans “vast swaths of core First Amendment activity” that have nothing to do with the government’s professed purpose of preventing sex offenders from using social media sites to gather information that they can then use to target minors for sexual abuse. The law targets speech on some of the platforms that Americans use most often—indeed, Goldberg noted, under the law Packingham could not even use Twitter to read the myriad messages discussing his own case—and imposes punishment without regard to whether the sex offender has actually done anything wrong.

But Goldberg ran into resistance from justices of all ideological stripes, some of whom suggested that perhaps the ban could survive if the court interpreted it narrowly—for example, as Justice Samuel Alito posited, by reading it as limited to “core social networking sites” like Facebook or Google Plus. Justice Stephen Breyer also seemed open to this possibility, telling Goldberg that perhaps the law could be interpreted as barring sex offenders from visiting a site that allows people to meet or exchange information.

Even Ginsburg and Kagan did not seem at first to regard the law as completely flawed. Ginsburg observed that states impose other restrictions—such as taking away the right to vote or to own guns—on the fundamental rights of convicted criminals. And responding to a hypothetical about whether states could require sex offenders to agree to have their social media monitored for communications with minors, Kagan noted that it is “not unheard of in First Amendment law” to have prophylactic rules when – as here – North Carolina argues that it lacks the resources to engage in such monitoring.

But the tide seemed to turn when Robert Montgomery, the senior deputy attorney general representing North Carolina, took the lectern. Montgomery pushed back against the depiction of social media sites by Kagan and Ginsburg (among others) as a “crucial channel” of communication. He emphasized that sex offenders subject to the law would have other alternatives, such as podcasts, blogs and *The New York Times*. That seemed to convince Alito, who would later express doubt about whether there were no other alternatives: He told Goldberg dryly that “I know there are people who think life was not possible without Twitter and Facebook.”

Other justices, however, were more skeptical about the state’s arguments. Justice Sonia Sotomayor questioned the premise that the law is necessary to prevent sexual abuse of minors. She told Montgomery that he was building “layer upon layer of speculation” or statistical inferences. The law doesn’t apply only to people who used the Internet to commit a sexual offense, she stressed, but instead applies to everyone. Where is the basis, she queried, for the inference that a sex offender like Packingham would use the Internet to commit another crime? These restrictions are particularly problematic, she continued, when would-be criminals can use the Internet for “almost anything,” including finding a bank to rob.

Breyer joined the fray, telling Montgomery that legal texts are filled with cases upholding the right to say dangerous things. Here, he asked dubiously, when faced with a scenario in which people might say something dangerous, the state’s remedy is to cut off the speech altogether? It seems to be well-settled law, he concluded, that the state can’t do so unless there is a “clear and present danger.”

And perhaps most critically for the state, Justice Anthony Kennedy was unconvinced by the state’s efforts to rely on a 1992 case in which the justices upheld a Tennessee law that imposed a ban on soliciting votes or distributing campaign materials within 100 feet of a polling place. The court in that case ruled that the ban served the state’s interest in protecting its citizens’ right to vote freely, but Kennedy today dismissed the Tennessee ban as “not analogous” to North Carolina’s. If that is the best you have, he seemed to be saying to Montgomery, “I think you lose.”

If Kennedy is indeed on board, then Packingham seems to have five votes in favor of striking down the North Carolina law. A decision in the case is expected by summer; if Packingham does prevail, he can read about the ruling not only on the SCOTUSblog website, but also on our Facebook and Twitter feeds.

Posted in *Packingham v. North Carolina*,
Analysis, Featured, Merits Cases; SCOTUSblog

Resources

We are pleased to offer the following resources. Donations accepted to cover cost of postage and printing. Mail donations to the CURE-SORT address noted on Page 3.

One Breath At A Time by Ila Davis (\$17.50)

Understanding Offending Behavior by Stephen Price. (A collection of 9 of Stephens articles from previous newsletters) (\$4.00 for the set of 9 articles)

When Someone on the Registry Moves Into My Neighborhood (Member Price \$5; Non-Member Price \$10)

SUPPORT GROUP: Families & friends for those in civil confinement, contact Andrew Extein, MSW. Interested persons please e-mail: CCN@curenational.org

No More Victims – One Man’s Journey Into Sexual Offending and Recovery, By S. Sands (Ed G.), \$14.95 includes shipping. Request by e-mail to: gunder788@verizon.net or amazon.com, or request by writing to CURE-SORT

Even in tears there hides a rainbow. Ed G.