

Cause No. WX13-90034-T

	§	IN THE 283RD
	§	
Ex Parte: Kenneth Baze	§	JUDICIAL DISTRICT COURT
	§	
	§	OF DALLAS COUNTY, TEXAS

AMENDED APPLICATION FOR WRIT OF HABEAS CORPUS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, KENNETH BAZE, by and through his attorney of record, Niles Illich, hereinafter “Petitioner,” pursuant to article 11.072 of the Texas Code of Criminal Procedure, and submits this, his Amended Application for Writ of Habeas Corpus, contending:

Applicant, KENNETH BAZE, is illegally restrained of his liberty by the presiding judge of the 283rd Criminal District Court, by being subjected to an unconstitutional condition of community supervision for the offense of injury to a child, 14 years or younger in cause number F-0701229-T. This unconstitutional condition requires Baze to complete a “Sex Offender Assessment” and abide by any and all sex offender treatment directives, counseling, instructions, etc. that are recommended by the assessor. This condition violates Baze’s rights under the Fifth and Fourteenth Amendments to the Constitution of the United States and the rights guaranteed to him by article I, section 10, and article I, section 19 of the Texas Constitution. In support of the same, Petitioner would show this Honorable Court as follows:

1. Cognizable Claims under Article 11.072

Article 11.072 “establishes the procedures for an application for a writ of habeas corpus in a felony or misdemeanor case in which the applicant seeks relief from an order or a judgment of conviction ordering community supervision.”¹ An application may not be filed under article 11.072 if the applicant could obtain the requested relief by means of an appeal.² “An applicant

¹ TEX. CODE CRIM. PROC. ANN. art. 11.072, § 1.

² See *id.* § 3(a).

may challenge a condition of community supervision under this article only on constitutional grounds.”³

2. Introduction and Background

A. Police Report, Original Charge and Plea

A police report from 2003 alleges that Baze sexually assaulted a child, but nothing in Baze’s record suggests that he was convicted of this or any other sexual offense.

On October 25, 2007, an information was issued that charged Baze with two counts of injury to a child under the age of 14 (cause nos. F-0701229-T and F-0701230-T). (Ex. A). On October 25, 2007, Baze confessed to these allegations and, in each case, this Court placed Baze on community supervision/deferred adjudication for a period of five years.

The plea agreement that Baze entered into for cause number F-0701229-T contained the following admonishment:

I understand the admissions regarding unadjudicated community supervision, and that I will be required to register as a sex offender if convicted of, or placed on community supervision for, one of the offenses enumerated under the Court’s Admonition to Sex Offenders, attached hereto. . .

(Ex. B). This plea agreement did not include a document entitled, “Court’s Admonition to Sex Offenders.” (Ex. B).

In each case, Baze’s community supervision/deferred adjudication was predicated on Baze’s compliance with eighteen separate conditions. Condition “R” of this community supervision/deferred adjudication was as follows:

Within 30 days complete a *Sex Offender* Clinical Assessment with a counseling agency approved by this court. The defendant is further ordered to abide by any and all treatment directives, participate fully in counseling, comply with the rules and regulations of the

³ *Id.* § 3(c).

approved agency, pay all costs incurred for services and continue in treatment/counseling *for sex offenders* until released by the Court if deemed necessary. (Emphasis added).

B. First Motion to Adjudicate and Modification of Original Terms of Community Supervision/Deferred Adjudication

On April 7, 2008, the State filed a Motion to Adjudicate. In this Motion, the State alleged that Baze had violated five conditions of his community supervision/deferred adjudication—including the sex offender condition, condition “R.” On May 8, 2008, this Court heard and denied the State’s Motion; on that same day, this Court extended Baze’s community supervision/deferred adjudication for an additional five years and modified the terms governing his community supervision/deferred adjudication. Condition “T” of these new terms was identical to Condition “R” in the original conditions of Baze’s community supervision/deferred adjudication.

Seven days after this hearing, Baze filed a Notice of Appeal.⁴ On January 28, 2010, the Fifth Court of Appeals dismissed Baze’s appeal for a want of jurisdiction. (Ex. C).

C. May 2010 through June 2012

At an unknown date between May 2010 and June 2012, this Court adjudicated cause number F-0701230-T and ordered that Baze be incarcerated in the Texas Department of Corrections. On April 20, 2012, this Court modified the conditions of Baze’s community supervision/deferred adjudication for cause number F-0701229-T to include a condition that he remain at least 1000 feet from places where children under the age of 17 gather.

D. The State’s Second Motion to Adjudicate

On June 8, 2012, the State filed a Motion to Adjudicate cause number F-0701229-T. In this Motion, the State alleged that Baze had violated five of the conditions of his community supervision/deferred adjudication including Condition “T,” which imposed the sex offender

⁴ The Court of Appeals assigned this case number: 05-08-00672-CR.

counseling and treatment.

E. Baze's First Motion to Remove Sex Offender Requirements and Baze's Second Attempt to Appeal

On September 12, 2012, Baze's appointed counsel, Janet Traylor, filed a Motion to Remove Sex Offender Requirements from Baze's community supervision/deferred adjudication. This Motion contended that the imposition of sex offender conditions on Baze, as a requirement for maintaining his community supervision/deferred adjudication, violated his due process rights. This Court held a hearing on October 23, 2012 and denied Baze's Motion. This hearing did not result in any modification to the terms and conditions of Baze's community supervision/deferred adjudication, yet Baze filed a Notice of Appeal. On January 2, 2013, the Court of Appeals sent a letter to Baze's attorney requesting briefing on the issue of whether the Court of Appeals had jurisdiction to consider this appeal.⁵ (Ex. D). No briefing was filed and the Fifth Court of Appeals dismissed Baze's appeal for a want of jurisdiction. (Ex. E).

F. Baze's 11.072 Writ

On October 25, 2013, Baze's attorney filed an application for habeas corpus relief under article 11.072. (Ex. F). The clerk assigned this application cause number WX13-90034-T. As of the date of the filing of this Amended 11.072 Writ, findings have not been entered on the original writ. (Ex. G).

G. Baze's Second Motion to Remove Sex Offender Requirements

On November 21, 2013, Baze's attorney filed a document entitled, "Brief in Support of Motion to Amend Conditions of Community Supervision."

On that day, this Court held a hearing on the conditions of Baze's community supervision/deferred adjudication. The Court Reporter's Record of this hearing mistakenly

⁵ The Court of Appeals assigned this case number: 05-12-01652-CR.

identifies the hearing as having occurred in cause number “F07-01299-T.” (Ex. H; 1:2). At the commencement of the hearing, this Court correctly announced that, “This is Cause Number F07-01229, *State of Texas versus Kenneth Baze*.” (Ex. H; 4:3–4). This Court then provided context for the hearing stating, “The defendant is appealing [prior decisions to leave in place the sex offender conditions to his community supervision/deferred adjudication].” (Ex. H; 4:15–16). This Court then granted Baze a *de novo* hearing on the terms and conditions of his community supervision/deferred adjudication. (Ex. H; 5:14–16). Halfway through this short hearing, counsel for Baze asked, “Kenneth, you realize that we’re here on a [*sic*.] application for a writ Article 11.072?” To which Baze responded, “Yes.” (Ex. H; 13:9–11). This Court denied relief. (Ex. H; 23:8–25; 24:1–4).

The docket sheet for cause number F07-01229-T reflects that Baze received a *de novo* hearing on the terms and conditions of his community supervision on November 21, 2011. (Ex. I). The docket sheet for cause number WX13-90034-T is blank as of the filing of this amended writ. (Ex. G).

On December 13, 2013, Baze filed another Notice of Appeal.

3. The Manner of Imposing Sex Offender Registration and/or Treatment on Baze Violated Baze’s Procedural Due Process Rights

Baze contends that the imposition of a condition intended for sex offenders on his community supervision/deferred adjudication—when he was charged, indicted, and confessed to a non-sexual offense—violated his substantive and procedural due process rights.

A. Waiver

The Court of Criminal Appeals has held that there are three types of rules, or rights, in our judicial system.⁶ In the first category are absolute, systemic requirements that must be complied

⁶ *Marin v. State*, 851 S.W.2d 275, 279 (Tex. Crim. App. 1993).

with regardless of whether there is any request or objection.⁷ The clearest instances of nonwaivable, nonforfeitable systemic requirements are those affecting the court’s jurisdiction.⁸ In addition, several other absolute requirements have been recognized.⁹ In the second category are rules that must be implemented unless expressly waived.¹⁰ This category includes some constitutional rights, including some procedural due process rights. A litigant is not deemed to have given up such a right unless “he says so plainly, freely, intelligently, sometimes in writing and always on the record.”¹¹ Finally, the third category contains rules that must be implemented upon request, including most of “the myriad evidentiary and procedural rules comprising our system.”¹²

B. Procedural Due Process

The Due Process Clause of the Constitution of the United States reads: “nor State shall . . . deprive any person of life, liberty, or property, without due process of law.”¹³

The Due Process Clause of the Texas Constitution is nearly identical to the federal due process clause and states: “No citizen of this State shall be deprived of life, liberty, property, privileges or immunities, or in any manner disfranchised, except by the due course of the law of

⁷ *Id.*

⁸ *See Mendez v. State*, 138 S.W.3d 334, 341 (Tex. Crim. App. 2004).

⁹ *See Saldano v. State*, 70 S.W.3d 873, 888-89 (Tex. Crim. App. 2002) (listing such requirements).

¹⁰ *Marin*, 851 S.W.2d at 279.

¹¹ *Marin*, 851 S.W.2d at 280.

¹² *Id.* at 278.

¹³ U.S. CONST. amend. XIV, § 1, cl. 3.

the land.”¹⁴

The Supreme Court has adopted a two-step analysis to examine whether an individual’s procedural due process rights have been violated. The first question “asks whether there exists a liberty or property interest which has been interfered with by the State; the second examines whether the procedures attendant upon that deprivation were constitutionally sufficient.”¹⁵

i. *Coleman and Meza*

In *Coleman* and in *Meza*, the Fifth Circuit Court of Appeals recently recognized that prisoners and parolees who have never been convicted of a sexual offense have “a liberty interest in being free from being required to register as a sex offender and[/or] participate in sex offender therapy. Other circuits have reached the same conclusion.”¹⁶

ii. *Evans*

In *Evans*,¹⁷ the Court of Criminal Appeals relied on *Coleman* and *Meza* and determined that before parole can be conditioned on sex offender registration and/or therapy, the parolee is entitled to all of the following procedural due process:

- 1) written notice that sex offender conditions may be imposed as a condition of mandatory supervision;
- 2) disclosure of the evidence being presented against him to enable him to marshal the facts asserted against him and prepare a defense;
- 3) a hearing in which the person is permitted to be heard in person, present documentary

¹⁴ TEX. CONST. art. 19.

¹⁵ *Kentucky Dep’t. of Corr. v. Thompson*, 490 U.S. 454, 460 (1989) (internal citations omitted).

¹⁶ *Meza v. Livingston*, 607 F.3d 392, 401 (5th Cir. Tex. 2010); *Coleman v. Dretke*, 395 F.3d 216, 222 (5th Cir. Tex. 2004) (citing *Vitek v. Jones*, 445 U.S. 480 (1980)).

¹⁷ *Ex parte Evans*, 338 S.W.3d 545 (Tex. Crim. App. 2011).

evidence, and call witnesses;

4) the right to confront and cross-examine witnesses, unless good cause is shown;

5) an impartial decision maker; and,

6) a written statement by the factfinder as to the evidence relied upon and the reasons it attached sex offender conditions to his mandatory supervision.¹⁸

In coming to this conclusion, the Court of Criminal Appeals emphasized that the procedural due process announced in *Coleman*, and echoed in *Meza*, is nearly identical to the procedural due process that the United States Supreme Court has provided for an inmate before an inmate suffers a loss of “good time credits,” an involuntary transfer to a mental hospital, etc.¹⁹ The Court of Criminal Appeals reasoned that, “If an inmate is entitled to those [procedural] due-process protections, surely a parolee who had already been discretionarily released because he did not pose a danger to society is entitled to those [same procedural due-process] protections.”²⁰

B. Baze has Not been Convicted of a Sex Offense and Has Not been Adjudicated Guilty of the Charge of Injury to a Child, Yet Baze’s Community Supervision is Predicated on his Participation in Sex Offender Treatment

Here, Baze remains on community supervision/deferred adjudication. There is no evidence that Baze has been convicted of a sexual offense. But, since 2007, Baze has been required to participate in sex offender treatment. Prior to the imposition of these conditions, Baze did not receive written notice that sex offender conditions could be imposed as a condition of community supervision nor is there a written statement by the factfinder identifying the evidence relied upon and the justifications for having attached sex offender conditions to Baze’s community

¹⁸ *Evans*, 338 S.W.3d 551.

¹⁹ *Evans*, 338 S.W.3d at 551 n.23 (citing to *Wolff v. McDonnell*, 418 U.S. 539 (1974)).

²⁰ *Id.* at 554.

supervision.

C. Baze Did not Receive Any Procedural Due Process with the Imposition of the Sex Offender Terms on his Community Supervision

Here, on at least three different occasions, Baze has had his community supervision/deferred adjudication predicated on participation in sex offender treatment and/or counseling and two different times was specifically instructed to “abide by any and all treatment directives, participate fully in counseling, comply with the rules and regulations of the approved agency, pay all costs incurred for services and continue in treatment/counseling for sex offenders until released by the Court if deemed necessary.”

i. *Baze Cannot Obtain Relief in a Direct Appeal*

Relief under article 11.072 is available only when an applicant cannot “obtain the requested relief by means of an appeal under Article 44.02 and Rule 25.2, Texas Rules of Appellate Procedure.” Baze has attempted to obtain appellate review of the requirement that he attend sex offender counseling and/or training, but the Fifth Court of Appeals dismissed these appeals for a lack of jurisdiction.²¹ (Exs. C & E). The Court of Appeals has already issued an opinion stating that it does not have jurisdiction to consider an appeal from a hearing in which no terms or conditions of community supervision were modified and in which no new conditions were added or established conditions removed. (Ex. E).

Accordingly, Baze has no remedy in the appellate courts. Therefore, Baze is permitted to seek relief under Article 11.072.²²

ii. *Baze has a Liberty Interest in not Participating in Sex Offender Treatment*

In *Coleman* and *Maze* the Fifth Circuit held that parolees who have not been convicted of a

²¹ Baze’s second plea agreement also included a waiver of his right to appeal.

²² TEX. CODE CRIM. PROC. Art 11.072 §3(a).

sex offense have a liberty interest created by the Due Process Clause in the Constitution of the United States to be free from sex offender registration and/or treatment.²³

In *Evans*, the Court of Criminal Appeals “followed the lead” of the Fifth Circuit “because the reasoning of the Fifth Circuit is persuasive and is consistent with that of several other circuit courts.”²⁴ Although *Evans* did not inquire into the liberty interest of the parolee in question, its adoption of *Coleman* and *Meza* acknowledges that parolees who have not been convicted of a sex offense have a liberty interest in being free from registering as a sex offender and/or being required to attend sex offender treatment.²⁵ In endorsing *Meza*, the Court of Criminal Appeals wrote, “If an inmate is entitled to those due-process protections, surely a parolee who had already been discretionally released because he did not pose a danger to society is entitled to those [same procedural-due process] protections.”²⁶

Appropriating the reasoning from *Evans* permits Baze to argue that if a parolee has a liberty interest in not being required to register as a sex offender and/or to attend sex offender treatment, then a person who has not been adjudicated guilty and is under terms of community supervision/deferred adjudication possesses that same, if not greater, liberty interest.

Accordingly, Baze has a liberty interest in not being required to register as a sex offender and/or participate in sex offender treatment.

iii. *This Court Denied Baze Procedural Due Process*

Meza provided six procedures that must be followed before a parolee who has not been convicted of a sexual offense can have sex offender conditions imposed on him. *Evans*

²³ *Meza*, 607 F.3d at 401; *Coleman*, 395 F.3d at 222.

²⁴ *Evans*, 338 S.W.3d at 555.

²⁵ *Id.*

²⁶ *Id.* at 554.

recognized these six conditions and held that because they had not been followed, the “applicant is entitled to the relief he seeks: immediate reinstatement of his release on mandatory supervision and removal of ‘Special Condition X’ [sex offender conditions] from the terms of his parole.”²⁷

While Baze recognizes that he had an impartial decision-maker, he contests any allegation that he received any further procedural due process. Certainly, the record does not include any notice to Baze that he faced sex offender conditions as a condition of his community supervision. Similarly, the record does not include a written finding by the factfinder that justifies the imposition of sex offender conditions.

While *Evans* and *Meza* are not identical to this case, the logic of extending *Evans* and *Meza*, cases concerning parolees, to Baze, a person on community supervision/deferred adjudication, is sound. Accordingly, Baze contends that he was denied procedural due process and requests that this Court remove the condition of his community supervision that obligates him to participate in sex offender registration and/or treatment.

iv. *Baze Did Not Waive His Procedural Due Process Rights*

Evans did not discuss waiver; however, prior to the imposition of the sex offender conditions, Evans was provided with a document entitled: “Notice and Opportunity to Respond Pre-Imposition of Sex Offender Special Conditions.”²⁸ Here, Baze did not receive prior written notice that his community supervision could be conditioned sex offender treatment. Baze testified that he was unaware that sex offender conditions could be imposed on him until his community supervision hearing had concluded. Accordingly, Baze could not have objected to these terms because neither he nor his attorney knew of the sex offender conditions until after they

²⁷ *Evans*, 338 S.W.3d at 557.

²⁸ *Id.* at 547.

had been imposed on him. Thus, Baze did not waive these procedural due process rights.

4. The Imposition of Sex Offender Treatment on Baze Violated his Substantive Due Process Rights

Baze contends that the requirement that he participate in sex offender treatment is so disconnected from the offense that he was charged with and to which he entered a plea of guilty that it violates his substantive due process rights under the Constitutions of the United States and of Texas.

A. Substantive Due Process and Texas Law on Community Supervision

i. Substantive Due Process

Substantive due process generally protects against the arbitrary exercise of governmental powers, unrestrained by established principles of private rights.²⁹ The Fifth Circuit has explained that “public officials violate substantive due process rights if they act arbitrarily or capriciously.”³⁰ The substantive component of the Due Process Clause provides heightened protection against government interference with fundamental rights or liberty interests.³¹ However, an action by a state official affecting an interest that is not a fundamental right is valid if it bears a rational relationship to a legitimate state interest.³²

²⁹ See *Cnty. of Sacramento v. Lewis*, 523 U.S. 833, 845, 118 S. Ct. 1708, 140 L. Ed. 2d 1043 (1998).

³⁰ *Fowler v. Smith*, 68 F.3d 124 (5th Circ. 1995); *Jones v. State*, 982 S.W.2d 386, 396 (Tex. Crim. App. 1998) (citing to this language in *Fowler* “only to show this concept is a recognized part of due process.”).

³¹ See *Washington v. Glucksberg*, 521 U.S. 702, 720 (1997).

³² See *Ex parte Morales*, 212 S.W.3d 483, 493 (Tex. App.—Austin 2006) (challenging constitutionality of statute).

ii. *Texas Law on Community Supervision*

Article 42.12 of the Code of Criminal Procedure governs the imposition, conditions, and termination of community supervision.³³ Section eleven of this article provides the “Basic Conditions of Community Supervision.”³⁴ These conditions are familiar to this Court but include conditions such as payment of fees to Crime Stoppers, community service, etc.³⁵ Notably, these “basic conditions” do not include sex offender treatment. They do, however, allow a judge to impose “any reasonable condition that is designed to protect or restore the community, protect or restore the victim, or punish, rehabilitate, or reform the defendant.”³⁶

Section 9A of this article governs community supervision for “sex offenders.”³⁷ This section defines a “sex offender” as “a person who has been convicted or has entered a plea of guilty or nolo contendere for an offense under any one of the following: [aggravated kidnapping, indecent exposure, indecency with a child, sexual assault, aggravated sexual assault, prohibited sexual conduct, certain types of burglary, sexual performance by a child, possession or promotion of child pornography.]”³⁸

B. *Baze was Required to Submit to Sex Offender Treatment even though He was Charged with and Pleaded Guilty to a Non-Sexual Offense*

The charging instrument in this case was an information issued on October 25, 2007. This information alleged that Baze committed two separate instances of injury to a child under 14.

³³ TEX. CODE CRIM. PROC. art. 42.12.

³⁴ *Id.* at § 11.

³⁵ *Id.*

³⁶ *Id.* at § 11(a).

³⁷ *Id.* at § 9A.

³⁸ *Id.* at § 9A(a)(2)(A–I).

Baze entered a plea of nolo contendere to these charges and was placed on community supervision/deferred adjudication for the charged offenses. Yet, on three separate occasions, Baze's community supervision was conditioned on compliance with court ordered therapy that was intended specifically for sex offenders. This sex offender condition was impossibly vague as it required Baze "to abide by any and all treatment directives, participate fully in counseling, comply with the rules and regulations of the approved agency, pay all costs incurred for services and continue in treatment/counseling for sex offenders until released by the Court if deemed necessary."

C. The Imposition of Sex Offender Treatment and/or Registration on Baze Violated His Substantive Due Process Rights

Baze was charged with injury to a child. The definition of "sex offender" in the community supervision section of the Code of Criminal Procedure does not include injury to a child among the enumerated offenses that define a person as a "sex offender." The "Basic Conditions of Community Supervision" do not include any conditions that would require a person to participate in sex offender therapy and/or treatment.

Evans acknowledged the stigma associated with being identified as a sex offender and/or being compelled to attend sex offender treatment.³⁹

Here, Baze was not charged with, nor did he admit to, a sexual offense. Instead, Baze was charged with injury to a child. Baze accepted this charge and entered a plea that placed him on five years of community supervision/deferred adjudication. The terms of Baze's community supervision conformed to the "basic conditions" of community supervision found in §11, but this Court also required Baze to: "complete a *Sex Offender Clinical Assessment* with a counseling agency approved by this court. The defendant is further ordered to abide by any and all treatment

³⁹ *Evans*, 338 S.W.3d at 557.

directives, participate fully in counseling, comply with the rules and regulations of the approved agency, pay all costs incurred for services and continue in treatment/counseling *for sex offenders* until released by the Court if deemed necessary.” (Emphasis added).

A person’s substantive due process rights have been violated when the State acts capriciously against a person’s liberty interest.

Baze concedes that the State has a legitimate interest in supervising the community supervision of individuals who have been convicted of a criminal offense or have had their adjudication deferred. Baze, however, contends that a requirement that a person who has been charged with injury to a child and placed on community supervision/deferred adjudication be required to attend highly stigmatizing sex offender treatment is not rationally related to this legitimate state interest. Because there is no rational relationship between the State’s legitimate interest in supervising individuals on community supervision and requiring non-sex offenders to participate in highly stigmatizing sex offender treatment such a requirement is capricious.

Baze relies on his prior analysis to support his position that he has a liberty interest in not being compelled to attend highly stigmatizing sex offender treatment.

Because the imposition of sex offender conditions on a person who is on community supervision/deferred adjudication and has not committed a sex offense is not rationally related to a legitimate state interest and because a person has a liberty interest in being free from a requirement to participate in the highly stigmatizing sex offender treatment, the requirement that Baze attend such treatment as a condition of his community supervision/deferred adjudication violates his substantive due process rights.

Accordingly, Baze asks this Court to remove the sex offender conditions from the terms of his community supervision/deferred adjudication.

5. Prayer and Conclusion

Baze contends that the requirement that he attend sex offender treatment as a condition of his community supervision/deferred adjudication violates his procedural and substantive due process rights, which are guaranteed to him under the Constitution of the United States and of Texas. Accordingly, Baze asks this Court to reform the conditions of his community supervision/deferred adjudication and remove any the requirement intended for sex offenders.

Respectfully submitted,

Niles Illich
701 Commerce
Suite 400
Dallas, Texas 75202
Direct: (972) 802-1788
Facsimile: (972) 236-0088
Email: Niles@appealstx.com

STATE OF TEXAS §

COUNTY OF DALLAS §

BEFORE ME, the undersigned authority, personally appeared Niles Illich, Petitioner herein, after being duly sworn, stated upon oath that he has read the foregoing Application for Writ of Habeas Corpus and it is true and correct to the best of his knowledge and belief.

Niles Illich

SWORN TO and subscribed before me on this 2 day of February, 2014.

Notary Public, State of Texas
My Commission Expires: _____

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this Amended Application for Writ of Habeas Corpus was served on Craig Watkins, as the District Attorney, for the County of Dallas by certified mail on the 3rd day of February, 2014 at:

District Attorney's Office
ATTN: Appellate Division
Frank Crowley Courts Building
133 N. Riverfront Boulevard, LB 19
Dallas, Texas 75207

Niles Illich