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Origins and Evolution

Wayne A. Logan

Chapter 1 recounts the historical evolution of sex offender registration and notification (SORN) laws in the US. Registration laws originated in the 1930s, first in municipalities in the Los Angeles area, and later several states, typically targeting individuals with criminal convictions more generally. Over time, interest in registration flagged, but experienced a major resurgence in the early 1990s, when states, acting in the wake of high-profile sexual victimizations of children, quickly enacted new laws, this time targeting convicted sex offenders in particular. The new-era laws were not only more expansive and onerous than their antecedents, they differed in a critically important respect: For the first time, the information they contained concerning individuals was made publicly available, in the name of community self-protection. SORN laws have since continued to expand, in significant part due to pressure from the federal government, and today are in effect nationwide affecting the lives of hundreds of thousands of individuals.

For most Americans, sex offender registration and notification (SORN), which today directly affects the lives of hundreds of thousands of convicted sex offenders, is likely viewed as a long-standing pillar of the criminal justice system. In actuality, however, SORN has been in use only since the early 1990s. Its rapid embrace by US jurisdictions since then marks a critically important social, political, and legal shift in the national zeitgeist. No longer does "doing one's time" mean that post-prison an individual is entitled to re-enter society free of social stigma and correctional surveillance. Rather, a conviction triggers potentially lifelong notoriety and monitoring by community members – not only police – who are expected to be "co-producers" of public safety.

This chapter surveys the origins and evolution of SORN laws, which have grown increasingly expansive and onerous over time.

1.1 EARLY ERA (1930S–1990)

1.1.1 *Historical Antecedents*

Human societies have long sought to amass information on individuals thought to pose potential criminal risk. With the eventual passing in acceptability of physical

branding and mutilation, efforts were undertaken to collect and maintain information on particular individuals.

In the mid-to-late 1800s, England, for instance, required that all felons and certain misdemeanants register with police, for inclusion in a "Register of Distinctive Marks."[1] German authorities, for their part, maintained a nationwide ledger of citizens (the *Meldewesen*), recording individuals with criminal convictions.[2] France, starting in the early 1900s, required that "Gypsies" (thought to engage in such barbarities as child theft) register with authorities, permitting them to be monitored by newly organized mobile police squads.[3] Later, Nazis utilized the *Meldewesen* as a basis to monitor and round up Jews and others targeted by the Third Reich.[4]

Americans felt this same need to de-anonymize their populations, reflecting anxiety over the reality expressed in Alexis de Tocqueville's assessment that in America "[n]othing is easier than to pass from one state to another, and [it is in] the criminal's interest to do so."[5] With advances in photography, police created "rogues galleries" containing images of arrestees and suspicious persons, and borrowing a technique from the French, they assembled massive file cabinets containing photos, bodily measurements, and notations of "peculiar marks" (e.g., a scar or birthmark) of convicted individuals (a technique known as anthropometry).

At the turn of the twentieth century, fingerprinting became a prime method of recording individual identity, promising greater reliability and easier storage and retrieval capacity. As the Boston Police Department asserted in 1910, "as the digits record themselves there are no inaccuracies."[6] Chicago officials, in urging universal fingerprinting in the wake of a reported record-breaking increase in crime the year before, attributed the increase to "ignorance of who the criminals are."[7]

1.1.2 *Local Registries*

Against this backdrop, in the first decades of the twentieth century, a time when national concern regarding crime was at a fever pitch and Americans had greater

[1] Leon Radzinowicz & Roger Hood, "Incapacitating the Habitual Criminal: The English Experience," 78 *Michigan Law Review* 1305, 1340–43, 1349 (1980).

[2] Raymond B. Fosdick, *European Police Systems* 354–55 (New York, NY: The Century Company, 1915).

[3] Martine Kaluszynski, "Republican Identity: Bertillonage as Government Technique," in *Documenting Individual Identity: The Development of State Practices in the Modern World*, 131–37 (Jane Kaplan & John Torpey, eds.) (Princeton, NJ: Princeton University Press, 2001).

[4] Ian Hacking, *The Taming of Chance: Ideas in Context* 383 (Cambridge: Cambridge University Press, 1900).

[5] Gustave de Beaumont & Alexis de Tocqueville, *The Penitentiary System in the United States and Its Application in France* 101 (Carbondale, IL: Southern Illinois University Press, 1964). Tocqueville's observation no doubt stemmed in significant part from the differences between the highly migratory US population and the sedentary French population, as well as the fact that French prisoners were required to return to their village of origin until allowed by police to relocate. Ibid., at 131.

[6] Simon A. Cole, *Suspect Identities: A History of Fingerprinting and Criminal Identification* 165 (Cambridge, MA: Harvard University Press, 2001).

[7] United News, "May Check Crime by Registration: Chicago Proposes Trying Police System Used in European Cities," *Dallas Morning News*, January 3, 1921.

access to transport than ever before, criminal registration was born. In 1925, August Vollmer, Police Chief of Berkeley, California, and part-time professor at the University, urged registration of "all known criminals coming to California so that police can check their movements."[8] Doing so, Vollmer asserted, would have manifold benefits, including "keeping track of migratory criminals"; "locating persons wanted for crime"; "tracing family deserters"; "cataloging sex inverts and perverts"; and "preventing criminals from roaming about and concealing their identity."[9] Echoing Vollmer's enthusiasm, another police chief asserted in 1930 that registration would permit "police officers throughout the cities and throughout the rural districts ... to say to a suspected person, 'Who are you? Where do you belong? Where is your card?'"[10] The official predicted that the strategy "would cut down crime by fifty percent or more, because [criminal actors would] know they must have an identification card with them."[11]

Los Angeles, California, concerned about "striking at the steady flow of gangsters and their followers" from Chicago and eastern cities,[12] enacted the nation's first criminal registration law, which focused on persons convicted of an array of criminal offenses (not including those of a sexual nature). In late September 1931, Los Angeles District Attorney Burton Fitts presented for consideration to the County Board of Supervisors a registration provision. A statement accompanying the proposed ordinance provided as follows:

> While the registration system is in vogue generally throughout the world outside the United States and has proved a great deterrent to criminals changing their location with facility to avoid detection or to carry on their operations, such registration has not been initiated in the United States.
>
> The class of persons whose criminal convictions are the basis for the requirement of their reporting to the Sheriff are the type who are moving from one large center to another and enjoying the immunity that their residence in new locations affords them. They are able to become installed in this community under aliases, and to operate directly or through their associates with comparative freedom.[13]

While chiefly targeting "culprits en route to Los Angeles or harboring expectancy of visiting the area," the *Los Angeles Times* reported, the proposed law also provided "means for the indexing of all persons convicted" of the crimes specified who already resided in the area.[14]

[8] "Life Terms to End Crime Advocated," *Oakland Tribune*, September 28, 1925.
[9] Current Note, "Universal Registration," 25 *Journal of the American Institute of Criminal Law and Criminology* 650 (1934–1935).
[10] Donald Dilworth, ed., *Identification Wanted: Development of the American Criminal Identification System, 1893–1943*, at 214 (Gaithersburg, MD: International Association of Chiefs of Police, 1977).
[11] Ibid., at 215.
[12] "Gangsters to Be Fought with Registration Law," *Los Angeles Times*, September 23, 1931, at A1.
[13] Ibid.
[14] Ibid.

Despite initial optimism over its quick passage, public resistance soon surfaced. In one account, the *Times* reported that a local attorney, representing a "delegation of citizens," appeared before the Board in opposition to the proposed ordinance, arguing:

> Not only is the measure vicious but it places in the hands of ignorant police officers too much power. It will create a tremendous amount of suffering for ex-convicts who are trying to rehabilitate themselves, especially those who are in good positions of trust. It appears to be a harmless law, but we have too many harmless laws that appeared to be harmless until adopted, when they became dangerous weapons in the hands of certain interests.[15]

Some, the *Times* reported, worried that registration would "work a hardship on the man at one time convicted but who is now attempting to go straight." Such hardships, a local reverend contended, would include loss of work, and the reverend cited several instances of men he personally knew who would lose jobs if their pasts were disclosed. A representative of the State Department of Welfare worried about the effects on dependent members of households who "had never committed a crime but who would have to suffer if the man in the house had to expose his past."[16]

Practical concerns over the law's implementation were also expressed. A probation supervisor worried that individuals trying to remain law abiding would be penalized by the law, while "the man who is breaking the law now will keep on breaking it and will evade registering." A spokesperson for the Los Angeles County sheriff similarly offered that "the criminal not intending to live right will evade the law. It will be a law that will be very difficult to enforce."[17]

Despite these concerns, in 1933 the nation's first criminal registration law was enacted in Los Angeles County, California, in what the *New York Times* called a "quick move" to rid the area "of organized crime and a possible reign of gangsterism,"[18] and an "ace card" in the campaign to rid itself of organized crime.[19] Offenses triggering registration included counterfeiting, grand theft, grand larceny, embezzlement, forgery, burglary, felonious assault, robbery, arson, murder, kidnapping, and possession, sale, or transportation of narcotics.[20] Individuals subject to registration had to do so within forty-eight hours of arrival or, if already a resident, within forty-eight hours of the law's enactment. In addition to being fingerprinted and photographed, registrants were required to provide information such as their name and any aliases, a physical description, their

[15] "Board Delays Gang Check," *Los Angeles Times*, September 29, 1931.
[16] "Gangster Law Threshed Out," *Los Angeles Times*, October 28, 1931.
[17] Ibid.
[18] Associated Press, "Los Angeles County Registers Felons in a Drastic Move to Wipe Out Gangs," *New York Times*, September 13, 1933.
[19] Ibid.
[20] Los Angeles County Ordinance No. 73013, adopted September 12, 1933.

criminal history, and where they resided.[21] Although not required to verify the information at specified intervals, registrants were obliged to notify authorities of any change of address or living location within twenty-four hours of making the change.[22] Violation of the ordinance was punishable by a maximum $500 fine, imprisonment of up to six months, or both.[23]

In the ensuing decades, registration caught on with dozens of local governments in other parts of the nation. By 1969, fifty-two US localities had registration laws.[24] They apparently did not, however, figure very prominently in local criminal justice systems. In Philadelphia, for instance, "registration data [were] rarely used by the police,"[25] and police expressed concern over the constitutionality of registration, considering it indistinguishable from New Jersey's anti-"gangster" law, recently invalidated by the US Supreme Court.[26] An officer in an unspecified jurisdiction believed "this was not the kind of control that the police should have" and that individuals should not be subject to continued police scrutiny after they served their time in prison or jail.[27]

1.1.3 *State Registries*

State legislatures gravitated to registration somewhat later. Florida, in 1937, became the first state to require registration, but did so sparingly, only targeting individuals convicted of felonies involving "moral turpitude" who resided in counties with a population over 150,000 (Dade, Duval, and Hillsborough).[28] In 1947, California enacted the nation's first statewide registration law, targeting convicted sex offenders in particular; by 1967, eight states had registration laws; and by 1989, twelve states at some point had criminal registration laws on the books.[29]

Unlike local governments, which often focused on broad categories of crimes, early state laws, such as in California, were more prone to focus on particular offender subgroups. With the exception of Florida, which as noted initially required that persons convicted of felonies involving "moral turpitude" register, and later targeted felons more generally, other states targeted specific subgroups with registration. Sex offenders

[21] Ibid.
[22] Ibid.
[23] Ibid.
[24] Robert H. Dreher & Linda Kammler, *Criminal Registration Statutes and Ordinances in the United States; a Compilation* 32 (Carbondale, IL: Center for the Study of Crime, Delinquency, and Corrections, Southern Illinois University, 1969). The number was based on a national survey of 384 localities and excluded 10 California localities where local laws were invalidated on preemption grounds by the California Supreme Court in 1960.
[25] Note, "Criminal Registration Ordinances: Police Control Over Potential Recidivists," 103 *University of Pennsylvania Law Review* 60, 86 (1954).
[26] Ibid.
[27] Ibid.
[28] Ch. 18107, Laws of Fla. 1937, § 2.
[29] Wayne A. Logan, *Knowledge as Power: Criminal Registration and Community Notification Laws in America* 30–31 (Stanford, CA: Stanford University Press, 2009).

were a main target of state government concern. Of the state laws all except two targeted sex offenders (New Jersey and Illinois had "drug addict" registration laws). Altogether, as of 1989, every state with at least one registration law targeted sex offenders.[30]

States as a whole, however, showed only comparatively modest interest in registration. No new state registration laws were enacted between 1968 and 1984,[31] and thereafter only Illinois (1985)[32] and Arkansas (1987)[33] adopted laws. Arizona repealed its law (enacted in 1951) in 1978 but reinstated it in 1983.[34]

1.1.4 *Critical Scrutiny*

As noted earlier, registration had its critics. Indeed, when the first statewide registration law (targeting convicted sex offenders) was being considered in California, Director of Corrections Richard McGee outlined his concerns to Governor Earl Warren in a memorandum.[35] McGee wrote that while sex offenses were "revolting," there was a "principle involved which should not be disregarded. It has never been the practice in America to require citizens to register with the police, except while actually serving a sentence under the Probation or Parole Laws." McGee also worried that subjecting sex offenders to registration would establish a problematic precedent, warning that "[b]efore embarking upon this new practice with a particularly offensive group of individuals, we should not overlook the fact that we may be opening the door to similar practices for other groups as time goes on."

McGee predicted that individuals would likely fail to comply with the registration requirement and not update their registry information, undercutting the knowledge-based premise of registration itself. To McGee, it was

> questionable whether those cases most in need of careful supervision would continue to register and hence submit to questioning every time a sex crime is committed in the community. It is probable that a large percentage of these individuals would change their residence without registering and run the risk of being convicted of a misdemeanor for failing to do so.

McGee closed his memo by stating that while he was "entirely in sympathy" with the purposes of the bill, he felt "the problem was far too complex to attempt to control it by such a simple expedient as registration with the police."

[30] Ibid., at 31.
[31] Scott Matson & Roxanne Lieb, *Sex Offender Registration: A Review of State Laws* 5 (Olympia, WA: Washington Institute for Public Policy, 1995).
[32] 730 Ill. Comp. Stat. Ann. § 150/1–150/10 (West 1983) (citing 1986 Ill. Laws 84–1279).
[33] Ark. Code Ann. § 12–12-901 to 909 (1993) (citing 1987 Ark. Acts 585).
[34] Ariz. Code Ann. § 13–3821 to 3824 (1983).
[35] Memorandum from State of California Director of Corrections Richard A. McGee to Governor Earl Warren, July 2, 1947 (on file with author).

Similar concern was expressed by the Utah Attorney General in 1956. With the state embroiled in public debate over whether Utah should enact a registration law, the state's chief law enforcement officer expressed uncertainty over the constitutionality of registration:

> The imposition of the registration requirements upon persons merely because they have been convicted of a single crime, the fact that persons in some cases are subject to the registration requirement for the rest of their lives, and especially the manner in which these laws are often used, leads to the conclusion that these ordinances are of questionable constitutionality.[36]

Corrections personnel voiced similar concerns. For instance, in 1958 a nationwide survey of administrators charged with overseeing the interstate transfer of probationers and parolees reflected that 63 percent of respondents opposed registration.[37] One anonymous respondent related that registration "would be evaded by the very ones we would like to have recorded" and believed that "the philosophy is wrong and smacks of a Communistic or Nazi police state."[38]

Later, in 1983, the Los Angeles City Attorney branded the state registry "dysfunctional," because it included many nonserious sex offenders and was of no use in the effort to locate the "Hillside Strangler" who terrorized the community.[39] And in 1986, the *Los Angeles Times* published a lengthy exposé on problems with the state registry, focusing on the widespread failure of eligible individuals to register and the many data inaccuracies in the registry.[40] A spokesperson for the attorney general had "no idea" of the extent of wrong address information in the registry, adding that the fundamental problem was that "we have a people-tracking system of people that don't want to be tracked."[41]

The *Times* also reported that some authorities felt that any effort to construct and maintain a comprehensive and accurate registry was impossible due to resource and personnel limits. The captain in charge of records for the Los Angeles County Sheriff's Office offered that "[i]t's totally impractical to follow up to the degree that we'd be able to know where they are. It's a matter of workload and numbers." In light of this, the Sheriff's Office had ceased mailing notices to newly released offenders who did not voluntarily present themselves for registration because the Office was receiving a less than 1 percent response rate.[42]

[36] W. Keith Wilson et al., "Are Criminal Registration Laws Sound?," 4 *National Probation and Parole Journal* 272 (1958) (citing Opinion of the Utah State Attorney General to W. Keith Wilson, Compact Administrator, Utah Department of Probation and Parole, December 6, 1956).
[37] Ibid., at 271–74.
[38] Ibid., at 274.
[39] *In re* Reed, 663 P.2d 216, 219 n.7 (Cal. 1983).
[40] Kenneth Reich, "Many Simply Ignore Law: Sex Offender Registration Not Working, Experts Say," *Los Angeles Times*, August 8, 1986.
[41] Ibid.
[42] Ibid.

Finally, the *Times* noted that uncertainty remained over whether registration achieved its public safety goal. The Sacramento County Sheriff stated:

> And the question is, how much is gained? Suppose we had a file that was 100% accurate. What use is that file? How effective is that file in combating the sex crime problem? I'm not sure that anyone has really done that kind of analysis. We don't know how many crimes we would solve, or prevent.[43]

A few years later, a California Department of Justice study concluded that "address compliance is quite poor. Sex offenders, like other types of offenders[,] are a mobile group and, given the inconsistent approach to offender registration, it is unlikely that offenders more likely to offend are those keeping their residence address information up-to-date with law enforcement."[44]

1.2 MODERN ERA (1990–PRESENT)

The relative disinterest in registration, and qualms regarding its public safety effectiveness, evaporated in the 1990s. Whereas in 1990 only a handful of states had registration laws, by the mid-1990s such laws were in effect nationwide. Moreover, no longer would registry information be monopolized by police; it would be provided to community members.

The dramatic shift was triggered by several widely publicized child victimizations. In May, 1989, in Tacoma, Washington, a seven-year-old boy was kidnapped, raped, sexually mutilated, and left to die in the woods, but was able to identify his assailant, Earl Shriner. Shriner, recently released from prison, had a long record of convictions involving physical and sexual victimization of children, and was well known to authorities, who had unsuccessfully sought to have him involuntarily committed out of concern that he would re-offend.

Upon learning that authorities knew of Shriner's background, a group of outraged citizens demanded that the governor initiate a special session to revamp Washington's sex offender laws.[45] Three weeks after the assault, the governor ordered the creation of a task force to conduct a comprehensive reexamination of the state's efforts to combat sexual violence.[46] In late November 1989, the task force issued its report, which

[43] Ibid.

[44] Roy Lewis, *Effectiveness of Statutory Requirements for the Registration of Sex Offenders* 6 (Sacramento, CA: California Dept. of Justice, 1988).

[45] David Boerner, "Confronting Violence: In the Act and in the Word," 15 *University of Puget Sound Law Review* 525 (1992).

[46] Shriner's crime was the latest in a series of child and adult sexual victimizations by released sex offenders. *See* Barry Siegel, "Locking Up 'Sexual Predators': A Public Outcry in Washington State Targeted Repeat Violent Sex Criminals," *Los Angeles Times*, May 10, 1990 (noting September 1988 rape and murder of Diane Ballasiotes and history of Gary Minnix, who had been found incompetent to stand trial for four rape charges and in December 1988 raped and stabbed another adult female victim while in the community on furlough).

contained an expansive array of suggested reforms, which the legislature unanimously adopted as the Community Protection Act of 1990.

The new law, in addition to containing a controversial provision designed to broaden involuntary civil commitment of "sexual psychopaths," a strategy first used in the 1930s,[47] not only contained the state's first registration requirement, but it also authorized the nation's (indeed the world's) first community notification system. While notification had been considered by California in the mid-1980s,[48] Washington became the first jurisdiction to officially authorize public dissemination of registrants' identifying information.

The Washington Legislature backed its new regime with legislative findings. With respect to registration, the Act provided:

> The legislature finds that sex offenders often pose a high risk of reoffense, and that law enforcement's efforts to protect their communities, conduct investigations, and quickly apprehend offenders who commit sex offenses, are impaired by the lack of information available to law enforcement agencies about convicted sex offenders who live within the law enforcement agency's jurisdiction. Therefore, this state's policy is to assist local law enforcement agencies' efforts to protect their communities by regulating sex offenders by requiring sex offenders to register with local law enforcement agencies . . . .[49]

With respect to community notification, the legislature reiterated that persons convicted of sex offenses posed a "high risk" of recidivism and concluded that

> [p]ersons found to have committed a sex offense have a reduced expectation of privacy because of the public's interest in public safety and in the effective operation of government. Release of information about sexual predators to public agencies and under limited circumstances, the general public, will further the governmental interests of public safety and public scrutiny of the criminal and mental health systems so long as the information released is rationally related to the furtherance of those goals. Therefore, this state's policy . . . is to require the exchange of relevant information about sexual predators among public agencies and officials and to authorize the release of necessary and relevant information about sexual predators to members of the general public.[50]

The law was sex offender-specific yet targeted a relatively narrow scope of sexual offenders. Local law enforcement was responsible for handling community

[47] *See generally* Deborah W. Denno, "Life before the Modern Sex Offender Statutes," 92 *Northwestern University Law Review* 1317 (1998). In contrast to prior commitment laws, Washington's new law did not commit individuals in lieu of criminal confinement. Rather, it permitted potentially indefinite institutionalization in addition to – and after – prison terms served by individuals deemed "sexual predators," a new phrase destined to be a staple of the American lexicon. *See* Eric S. Janus & Wayne A. Logan, "Substantive Due Process and the Involuntary Confinement of Sexually Violent Predators," 35 *Connecticut Law Review* 319, 325 (2003).

[48] Joe Cantlupe, "Sex Offender Registration is Questioned," *San Diego Union-Tribune*, June 7, 1987.

[49] Wash. Rev. Code § 71.05.440.

[50] Ibid., § 71.05.670.

notification, and was authorized to "release relevant and necessary information" on registrants when "necessary for public protection." Such necessity was determined in part on the basis of information provided by an entity that evaluated individuals prior to release from prison, yet notification decisions were primarily made by local police. Risk level determined the scope of notification: for level I offenders, only local police; for level II, community groups, school districts, and registrants' neighbors; for level III, registrants posing most serious risk, all of these mentioned as well as members of the media.[51] Other departments opted for a more liberal policy and made information on all registrants (including photographs, and home and work addresses) available to the public upon request. Still others made case-by-case decisions on notification in a less category-specific manner.[52]

Washington's 1990 SORN regime was hugely significant. With it, the nation's attention was drawn to registration, and the legislation opened the door to notification. It was not, however, the sole catalyst behind the resurgence of registration and the advent of notification. Events elsewhere also played a key role. Chief among them was the October 1989 disappearance of an eleven-year-old boy, Jacob Wetterling, who while riding his bike in rural Minnesota was abducted by a masked man brandishing a gun. His mother, Patty Wetterling, in February 1990 created the Jacob Wetterling Foundation, which soon became a highly influential national force on matters relating to child victims of violence and sexual abuse. The group's influence was felt in Minnesota with the creation of the Task Force on Missing Children, the findings of which resulted in the state's June 1991 adoption of a registration law.[53]

In June 1992, Louisiana, after the murder of a six-year-old boy by a recidivist sex offender living in the community,[54] became the second state to adopt a registration law with a community notification feature, adopting in almost verbatim form legislative findings contained in Washington's law.[55] While Louisiana limited community notification to probationers and parolees,[56] it was more demanding than Washington's seminal law because it required registrants themselves to notify

[51] Washington State Institute for Public Policy, "Washington State's Community Notification Law: 15 Years of Change," 1 (February 2006); Jolayne Houtz, "When Do You Unmask a Sexual Predator?," *Seattle Times*, August 30, 1990.

[52] *See* Mary Anne Kircher, "Registration of Sexual Offenders: Would Washington's Scarlet Letter Approach Benefit Minnesota?," 13 *Hamline Journal of Public Law & Policy* 171 (1992). Local departments also varied in terms of the kinds of information they publicly disclosed, e.g., actual versus approximate registrant addresses, work addresses, and vehicle identification information. *See* Sheila Donnelly & Roxanne Lieb, *Washington's Community Notification Law: A Survey of Law Enforcement* 5 (Olympia, WA: Washington State Institute for Public Policy, 1993).

[53] *See* Wayne A. Logan, "Jacob's Legacy: Sex Offender Registration and Community Notification Laws, Practice, and Procedure in Minnesota," 29 *William Mitchell Law Review* 1287 (2003).

[54] "Girl's Slaying Adds Momentum to Plans to Track Sex Offenders," *San Francisco Chronicle*, August 8, 1994.

[55] 1991 La. Sess. L. Act No. 338, S.B. No. 1111 (June 18, 1992).

[56] Margaret Litvin, "Metairie Parents Alarmed by Paroled Sex Offender," *Times Picayune* (New Orleans), October 19, 1995.