

Electronically Filed

IN THE DISTRICT COURT OF THE STATE OF WASHINGTON

CHŌXFHUÎ SŌY

King County District Court

**IN THE DISTRICT COURT OF THE STATE OF WASHINGTON
FOR THE COUNTY OF KING**

MICHAEL PIEPKORN,

Petitioner,

v.

SIDDHARTH JHA,

Respondent.

No. 23-CIV-13936KCX

DECLARATION OF LISA TOON

I, Lisa Toon, under the penalty of perjury of the laws of the State of Washington,
state and declare as follows:

1. I am competent to testify at trial, am over 21 years of age, and make this
Declaration from my own personal knowledge and on my own free will.

2. As a mother and adult representative of two minor victims of child sex
abuse, I have been referred to in other court proceedings by my initials LT.

3. My biological son, MMD, and daughter, KDD, are the biological
grandchildren of Michael Piepkorn ("Dr. Piepkorn").

4. My current husband, who I am currently going through a divorce with, is
Tyler Desmond, Michael Piepkorn's biological son. My children are Dr. Piepkorn's
grandchildren.

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1 5. Because of the sex abuse that my children endured because of Dr.
2 Piepkorn's family, I have sole custody of my children MMD and KDD.

3 6. At the time my children were sexually abused at Dr. Piepkorn's house in
4 Port Angeles, WA, my son (MMD) was just 7 years old and my daughter (KDD) was just 2
5 years old.

6 7. In June 2021, my husband and Dr. Piepkorn's son, was charged with Child
7 Molestation in the First Degree, Possession of Depictions of Minor Engaged in Sexually
8 Explicit Conduct in the First Degree, and Possession of Depictions of Minor Engaged in
9 Sexually Explicit Conduct in the Second Degree. *See State of Washington v. Tyler John*
10 *Desmond*, King County Superior Court, Cause No. 21-1-03062-1 SEA.

11 8. In the State of Washington's criminal case against my husband, I am
12 represented by the Sexual Violence Law Center.

13 9. In November 2022, my husband was charged with possession of child
14 pornography. *See United States v. Tyler Desmond*, United States District Court Western
15 District of Washington, CR 22-188-TL (2022).

16 10. What my children went through was unspeakable. Words do not describe the
17 pain my children and I have endured. Dr. Piepkorn's family robbed my children of their
18 innocence. They tortured my children in ways that are absolutely horrific and unspeakable.

19 11. I cannot fathom how someone would do such despicable things to children,
20 let alone their own biological children.

21 12. Because I am a government witness in ongoing legal proceedings, I cannot
22 provide specific details regarding the child sex abuse involving Dr. Piepkorn's family that is
23 the subject of other ongoing litigation.

24 13. I do, however, want to bring to the Court's attention sexual misconduct
25 involving Dr. Piepkorn that I believe is important to speak up about.

26 14. The things that I have come to witness and know about Dr. Piepkorn and his
27 sexual misconduct are downright despicable and horrific.

1 15. Although Dr. Piepkorn is 75-years old, he is the biological father of two
2 other minor children, Zoey and Cameron Piepkorn.

3 16. I worry about the two minor children that still live with Dr. Piepkorn,
4 including Dr. Piepkorn's biological minor children, Zoey and Cameron.

5 17. The other reason I worry about those two minors and Dr. Piepkorn's
6 unsupervised visits around his own minor children is because Thao Pham—Dr. Piepkorn's
7 live-in girlfriend of 15 years and Zoey and Cameron's biological mother—regularly leaves
8 Zoey and Cameron in Dr. Piepkorn's sole care while Ms. Pham visits relatives in Portland.

9 18. My worry stems from the adverse impact Dr. Piepkorn's sexual misconduct
10 may have on them because I have seen how quiet and timid Zoey can be at times, and I
11 worry that she is not speaking up about horrific abuse she may have endured or witnessed.

12 19. I understand that at one point Dr. Piepkorn was even prohibited from
13 contacting his own minor children as part of an order entered by a King County Superior
14 Court Commissioner.

15 20. Dr. Piepkorn is a clinical professor at UW Medicine and a dermatologist at a
16 dermatology clinic in Bellevue, Washington called Dermatopathology Northwest.

17 21. I have personally seen Dr. Piepkorn engage in odd sexual behavior that I
18 find deeply troubling.

19 22. Over the years, I have personally witnessed Dr. Piepkorn engage in sexual
20 misconduct involving several young women. Dr. Piepkorn is a sexual predator. Some of that
21 sexual misconduct happened at events sponsored or hosted by Dermatopathology Northwest.

22 23. Because I was married to the son (Tyler) of one of the owners of
23 Dermatopathology Northwest, over the years, I went to some of Dermatopathology
24 Northwest's social gatherings where Dr. Piepkorn was present. One of those occasions was a
25 dinner at the Blue C Sushi restaurant in Downtown Bellevue several years ago.

26 24. The dinner at Blue C Sushi was part of a company party in which
27 Dermatopathology Northwest had rented out the Blue C Sushi restaurant, several limousines,

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1 and made reservations at nearby hotels for Dermatopathology Northwest employees and their
2 guests as part of the social outing.

3 25. At the dinner at Blue C Sushi, I was sitting in between Tyler and Dr.
4 Piepkorn. I distinctly remember seeing Dr. Piepkorn watching porn on his cell phone while
5 we were at dinner.

6 26. Dr. Piepkorn leaned over to show Mike Tran and Joel (employees of
7 Dermatopathology Northwest) porn videos while we were at dinner at Blue C Sushi.

8 27. I thought such an public display of sexual material was disgusting given how
9 there were other Dermatopathology Northwest employees and guests at the dinner table.

10 28. After we had dinner at Blue C Sushi, we all went to Lucky Strike Bowling in
11 Lincoln Square. I remember we were all dancing on the dance floor.

12 29. While I was on the dance floor, I remember turning around and seeing Dr.
13 Piepkorn groping and making out with several young Asian women. I personally saw Dr.
14 Piepkorn take turns to grope them and make out with each one of them.

15 30. I also personally saw Dr. Piepkorn running his hands in between the young
16 women's legs while he was making out with them.

17 31. When I saw that, I remember thinking to myself, "is that really my father-in-
18 law?" I was disgusted with what I saw Dr. Piepkorn do.

19 32. The young Asian women I saw Dr. Piepkorn grope and make out with
20 looked like they were in their late teens because as a then 29-year old, I remember being
21 surprised at how awfully young they looked.

22 33. This happened while Dr. Piepkorn's long-time girlfriend, Ms. Pham, was
23 pregnant with their first child.

24 34. I understand that Mr. Jha wrote a letter to the University of Washington in
25 which Mr. Jha called attention to Dr. Piepkorn's sex abuse and sexual misconduct.

26 35. Mr. Jha should not be punished because Mr. Jha chose to call attention to Dr.
27 Piepkorn's abuse, including the horrific child sex abuse my children endured.

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36. As the mother of the two children that are referenced in Mr. Jha's letter to the University of Washington, I was pleased to see Mr. Jha stood up for those two victims and brought attention to Dr. Piepkorn's sexual misconduct.

37. Mr. Jha gave a voice to those voiceless victims who endured serious child sex abuse—victims who would not be able to speak out had it not been for Mr. Jha having the courage to speak up.

38. Just like his son Tyler, Dr. Piepkorn is a sexual predator. Mr. Jha stood up to Dr. Piepkorn and Mr. Jha should not be punished for standing up for what is right.

39. People should have a right to speak up about child sex abuse without fear of intimidation from Dr. Piepkorn.

40. I do fear coming forward with some of this information, especially regarding Dr. Piepkorn's sex abuse and previous sexual misconduct.


41. I am nowhere near as wealthy or as powerful as Dr. Piepkorn. Nor do I have as many resources at my disposal as Dr. Piepkorn does.

42. Dr. Piepkorn has hired an army of attorneys at powerful law firms like Hagens Berman and Oseran Hahn to help cover-up his sexual misconduct and bully his victims into silence.

43. I am genuinely fearful for the retribution Dr. Piepkorn will put me and my family through for speaking up against him.

44. I felt that I had the obligation to speak up about Dr. Piepkorn's sexual misconduct that I have personally witnessed because no one should have to go through the sex abuse Dr. Piepkorn put them through.

DATED this 28th day of July, 2023 in Redmond, Washington.

DocuSigned by:

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Lisa Toon