

FILED
May 21, 2012
Court of Appeals
Division III
State of Washington

NO. 299082-III

COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON

THE STATE OF WASHINGTON, Respondent

v.

MARGARET GRINSTEAD, Appellant

APPEAL FROM THE SUPERIOR COURT
FOR BENTON COUNTY

NO. 10-1-00088-1

BRIEF OF RESPONDENT

ANDY MILLER
Prosecuting Attorney
for Benton County

CHRISTINE M. BENNETT, Deputy
Prosecuting Attorney
BAR NO. 41205
OFFICE ID 91004

7122 West Okanogan Place
Bldg. A
Kennewick WA 99336
(509) 735-3591

TABLE OF CONTENTS

TABLE OF AUTHORITIES ii

STATEMENT OF FACTS 1

ARGUMENT 18

1. THE TRIAL COURT DID NOT ABUSE ITS
DISCRETION WHEN IT SET RESTITUTION AT
\$20,000 18

CONCLUSION 25

TABLE OF AUTHORITIES

WASHINGTON CASES

State v. Cunningham,
96 Wn.2d 31, 633 P.2d 886 (1981) 19

State v. Davison,
116 Wn.2d 917, 809 P.2d 1374 (1991) 18

State v. Gonzalez,
168 Wn.2d 256, 226 P.3d 131 (2010) 20, 21

State v. Griffith,
164 Wn.2d 960, 195 P.3d 506 (2008) 21-24

State v. Kinneman,
122 Wn. App. 850, 95 P.3d 1277 (2004) 19, 20

State v. Lohr,
130 Wn. App. 904, 125 P.3d 977 (2005) 19

State v. Moen,
129 Wn.2d 535, 919 P.2d 69 (1996) 20

WASHINGTON STATUTES

RCW 9.94A.753(5) 20

STATEMENT OF FACTS

After the defendant's plea of guilt and a restitution hearing, which was composed of several hearings that took place over the course of over a year, Ms. Grinstead was ordered to pay \$20,000.00 in restitution to Carl Gustafson. (CP 1306-07). The defendant's plea to Theft in the Third Degree was based on an incident in which she was accused of stealing almost all of Mr. Gustafson's personal property from his residence, and subsequently either selling it, or giving it away. (CP 1316-17; RP 02/18/10, 7). In exchange for Ms. Grinstead's plea of guilt to one count of Theft in the Third Degree, and her agreement to be held accountable for restitution as determined by the court, the Prosecuting Attorney dismissed the other original charges which included one count of Theft in the First Degree, three counts of Theft in the Second Degree, one count of Conspiracy to Commit Theft of a Vehicle and one

count of Presenting a False Insurance Claim. (CP 1-5; RP 02/18/10, 4-7).

Ms. Grinstead entered an Alford Plea. (CP 13). In her guilty plea, the defendant specifically gave the Court permission to incorporate the Prosecutor's Affidavit of Probable Cause as a basis for accepting the plea. (RP 2/18/10, 6). The Affidavit of Probable Cause was also considered by the Court for the purpose of the restitution hearing. (CP 1316-17; RP 02/18/10, 7). The State's Probable Cause Statement includes the following language:

[D]uring the time intervening between the 7th day of April, 2009 and the 30th day of September, 2009, the defendant took various items from her roommate and former husband, David Gustafson. On 9-25-09, Officer Leach of the West Richland Police Department spoke to an employee at Adventures Underground Bookstore in Richland. She stated that she had spoke to Mr. Gustafson about some books she bought from the defendant that were stolen from him by the defendant. The store employee identified the defendant by a picture. The defendant used the name "Maggie Ralston" when she sold the books. She received \$560 for the books. She was also captured by store security

cameras. The defendant had been previously given a court order not to remove any of Mr. Gustafson's belongings from the house they shared. While he was away she took a significant amount of his personal items. Mr. Gustafson showed Officer Olsen of the West Richland Police Department several empty shelves at his residence. Mr. Gustafson claims the shelves contained over 800 books and ammunition worth about \$20,000. Mr. Gustafson provided a two page list of items taken which amount to several more thousand dollars including a gold Buddha statue, a Masonic bible, a mattress, bedding, furniture, clothing, hunting accessories, jewelry, DVD's, electronics, appliances, and kitchen items and many more items. Detective Clark Boyer of the West Richland Police Department interviewed neighbors of the defendant and Mr. Gustafson. Some of the neighbors reported seeing Margaret Grinstead and another man, James Wodehouse, removing items from Mr. Gustafson's residence between April 7, 2009 and September 30, 2009. These neighbors report that Ms. Grinstead and Mr. Wodehouse had at least one yard sale during this period and also left a substantial amount of property listed as "free" for anyone to take. During this time, Mr. Wodehouse also had miscellaneous items for sale at his place of work, Arsen's Auto Body. During this period Ms. Grinstead had exclusive access to Mr. Gustafson's property because Mr. Gustafson was ordered not to enter the residence based on criminal allegations made by Ms. Grinstead against him. Those

allegations were dismissed September 25, 2009 by the State after evidence was produce that indicated that criminal charges were not appropriate. On October 24, 2009, Ms. Grinstead submitted a letter to her insurance company regarding being reimbursed for items lost from her home. These are the same items Ms. Grinstead is being accused of having sold/given away. At least one of Ms. Grinstead's neighbors reported to Detective Clark Boyer that Mr. Wodehouse offered to give her the truck and camper parked in front of the house. She stated that he was adamant that he wanted the truck out of the driveway because it was abandoned. This truck belonged to Gustafson and he was the legal owner of the truck. It was not abandoned.

(CP. 1316 - 1317).

At the sentencing hearing, the defendant agreed that the restitution amount could exceed the amount required for Theft in the Third Degree. (RP 2/25/10, 12, 14).

On April 13, 2011, the Court set restitution owed in the amount of \$20,000. (RP 04/13/11, 18). This amount was finally determined, well over a year after the defendant plead guilty, and after several hearings on this case, including

May of 2010, July of 2010, and November of 2011. Over the course of those hearings, the Honorable Judge Vanderschoor heard testimony from four witnesses and reviewed an exhibit of documents submitted by the State, which was over 60 pages in length. (EX A).

That 60-plus page exhibit included an itemized list of missing property created by the victim. (EX. A; RP 11/12/10, 8-9, 16). Next to almost every item, the defendant copies a link to a webpage that was used as a reference to determine the value of the item. (RP 11/12/10 11). The first page and a half of the list is an itemized list of ammunition the defendant was missing. (RP 11/12/10, 10-11; EX. A). The total value of the missing ammunition was placed at \$15,924.22. The list then includes a subsection entitled, "Stolen from camper." That list includes one lined leather jacket, several dress shirts (at least five), a special commemorative Gerber hunting/survival knife, a Gerber Back Paxe

Ax, a Gerber folding spade, a small survival pack, 6 Australian fir opals, and a gold chain. (EX A). The victim does not include the value of the gold chain in his final request, but as a side note states that a gold dealer in Richland estimated its value in excess of \$2,000.00. The total amount of the items he does place a value on in that subsection is listed as \$1342.00. On the third page of the victim's list, there is a subsection entitled "Stolen from garage" which includes 66 DVDs, 800+ books, one bed, 4 pillow, linens, 12 blankets, quilts, parka liners, custom SOG commemorative combat dagger, Sony CD-AM/FM radio alarm, Buck 110 folding hunter, serrated tungsten compound folding knife, Kershaw speed safe folding knife, Gerber multi-plier, unused LCD monitor, one cup new in box coffee maker, tiny gold Buddha (no price listed/sentimental value), Masonic Bible (no price listed/sentimental value), plastic bag of cables inclusive of 5 HDMI 2 meter, 1 HDMI Monster 19.68

ft, 2 component cables 4 wire, numerous other cables and connectors, Skill 3.6 volt lithium ion cordless driver, Makita 18 volt drill and light combo, US issue gortex camo jacket, pair Sorel bear snow boots, oil filled space heater, paper shredder, large sauce pan, dutch oven, cast iron, set kitchen knives with block with shears, double boiler, various other kitchen implements, all of [victim's] other clothes - winter socks, no less than twelve pair, two pairs of gloves, 6 plus sweats, six sweat pants fully pocketed, various sweater over and above, underwear, brief, hiking shorts, spare shoe laces, multiple shirts in various size, work gloves, 6 hand-knit Danish ski sweaters (no price indicated/sentimental value), heavy-duty winter dressing robe (no price indicated/sentimental value), no less than ten freehand briar pipes from Denmark. At the end of his five-page list of missing items with itemized prices and references to websites where prices were obtained, the defendant lists the value of

the total items taken from his residence as \$30,058.62. (EX. A).

The witnesses on behalf of the State at the restitution hearing included Gregory Grinstead, the defendant's long time friend, and the defendant's husband. Mr. Grinstead testified that he had been married to the defendant since 1983, and that they were in the process of divorcing. (RP 5/14/10, 6). Mr. Grinstead also testified that he had known the victim, Mr. Gustafson, since they were 13 years old, therefore approximately 50 years. (RP 05/14/10, 7). Mr. Grinstead reported that Mr. Gustafson had been living in his house for 15 years, during which time Gustafson got along with the defendant for the most part. (RP 05/14/10, 7). Mr. Grinstead stated that the relationship between the victim and defendant began to decline while Grinstead was working abroad in Iraq, which he started to do in 2004. (RP 05/14/10, 7-8). Mr. Grinstead said that while he was in Iraq, he

received information from a friend that the defendant was going on a trip with another man. (RP 05/14/10, 8). Grinstead checked his bank records and found out the money he had earned while working abroad over the prior six years was gone, and that the defendant had racked up approximately \$60,000.00 in credit-card debt over that same time period. (RP 05/14/10, 9).

Mr. Grinstead testified there was "no question at all" about whether the property in the victim's portion of the house belonged to him or not. (RP 05/14/10, 9). He testified the victim was an avid reader and bought a lot of books including science fiction, war books, and hard-back books which he stored in the garage in cabinets. He stated the victim had a lot of computer equipment, personal items, a bed, knives, plus a cabinet with a bunch of ammunition. (RP 05/14/10, 9-10). Mr. Grinstead stated that the weight of the ammunition belonging to the victim in the cabinet was so

heavy that it caused the wood to buckle and break. (RP 05/14/10, 11). Mr. Grinstead confirmed that photos taken by police showed those same cabinets empty. (RP 05/14/10, 11). Mr. Grinstead confirmed that the empty shelves in the photos taken by police used to be filled with the victim's books, video tapes, and movies; other items missing were the victim's bed, computer equipment, personal items, his clothing, microwave, and different things in boxes which included all kinds of items. (RP 5/14/10, 12).

Mr. Grinstead confirmed that a receipt from a bookstore showed that Ms. Grinstead was paid \$561.99 for books she had sold them. She was accused of stealing those books from Mr. Gustafson, the defendant. (RP 05/14/10, 14-15).

The State also called Spencer Oland as a witness. Mr. Oland testified that he met the victim in 1995 when he was an electrician, about the same time he met Mr. Grinstead and the defendant. (RP 5/14/10, 24). Oland stated that

he had visited the victim's residence and observed that the victim had "tons of books," as well as other items stored on his shelves such as CD's. (RP 05/14/10, 26). Oland further stated that he was aware the victim collected ammunition and guns, and it was common for the two to talk about different things that are military and weapons related, as they were both "military or related to the Vietnam era." (RP 05/14/10, 26). Oland confirmed a conversation with the victim about four or six opals the victim's mother had given to Gustafson during the Vietnam era. (RP 05/14/10, 27). Oland testified the victim was quite frugal about the way he lived and had just a few things that were important to him, such as a little gold Buddah that had sentimental value. (RP 05/14/10, 27). Oland confirmed the victim owned a gold chain, which had great sentimental value to Mr. Gustafson. (RP 05/14/10, 28). Oland stated the victim had "a massive amount" of property prior to the theft. (RP 05/14/10, 34).

Mr. Oland stated the victim and defendant got along fairly well over the course of living together. (RP 05/14/10, 27). Around the time that Mr. Grinstead filed for divorce against the defendant, Oland stated:

I was a bit protective of Mr. Gustafson because she - it was evidence to me that she wasn't really happy with him being there and I attributed that to her change of - decision to change her life - style. Obviously he was at a very bad place kind of an impediment to that and Mr. Gustafson was very protective of her initially before the assault situation and talked to me many times about being careful not to be too judgmental or anything about what is going on. I thought that was commendable.¹

¹ Mr. Gustafson was charged with Assault in the Fourth Degree, and the West Richland police put in place a No Contact Order against him. While the No Contact Order was in place, his personal property went missing, which lead to the Theft charges against Ms. Grinstead. (RP 04/13/11, 8). The Assault 4 charge against Mr. Gustafson was dismissed on September 18, 2009, because according to Megan Carper of the Benton County Prosecutor's Office, "Based on the facts of this case, it is highly improbable that a jury would determine the defendant committed this crime beyond a reasonable doubt. The facts demonstrate that the victim in the case, Margaret Grinstead, had moved a freezer shared by her and her roommate, the defendant, so that he could no longer make use of the freezer. She then attempted to physically block him from the freezer and an altercation ensued. The defendant's claim of self-defense is supported by the evidence, and a dismissal of the charge is therefore appropriate." (EX A; RP 04/13/11, 9). After the Assault case was dismissed, the West Richland police soon thereafter sent a referral to the Benton County Prosecutor's Office asking to charge Ms. Grinstead with Theft.

(RP 05/14/10, 29). Oland then testified that he saw an envelope that had been sent in the mail that contained a letter that included a deposit for an apartment for the defendant and another man, Eugene Browning. (RP 05/14/10, 30). Oland testified that when he was in the house checking the mail, he saw "numerous stickers all around the house between Margaret and Woody, another man, that were love notes and things like that." (RP 05/14/10, 30).²

Mr. Oland also testified that when a No Contact Order was placed against the victim, he went to the residence and removed some items belonging to the victim. (RP 05/14/10, 36). Specifically, Oland stated that he removed some wood, tools, worm drive saws, computer equipment, and firearms, but he took no ammunition. (RP 05/14/10, 36-37). Oland said that he did remove

² On July 20, 2010, James Wodehouse plead guilty to two counts of Attempted Theft in the Second Degree after being charged as a co-defendant in this case. He agreed to a Restitution Order to Mr. Gustafson in the amount of \$2,500.00, which was based on his lesser degree of culpability.

some items while the No Contact Order was in place, but confirmed that the residence and shelves were still full of property. (RP 05/14/10, 39).

Next, the State called Mary Oland. She testified that she met the defendant when their husbands were working together. (RP 5/14/10, 41). Ms. Oland stated that after the No Contact Order was in place, she went to the victim's residence and removed computer equipment, monitors, not the printers, a laptop computer, and some books that were not read and still in boxes. (RP 05/14/10, 43). Ms. Oland said that when they left the residence, they left most of the property including hundreds of books. As a former librarian, she could tell the victim was trying to keep the books in pristine care. (RP 05/14/10, 44). Ms. Oland said the victim's living quarters were very crowded, and observed a TV stand, a table, a large bed, bedding, boxes of clothes, brand new boots still in boxes, pans,

cooking items, spices, sodas, and noted that the victim purchased in quantity because he was frugal. (RP 05/14/10, 45-46). Ms. Oland stated the victim drinks root beer and there were probably 500 Coke rewards cans stacked up. (RP 05/14/10, 46).

Ms. Oland testified that during a phone conversation she had with Ms. Grinstead in May, Grinstead stated "she wanted all of the property out of the place because she was discussing that she was going to be wanting to knock a wall from that room to lighten up to the back of the house. She was wanting to remodel that room." (RP 5/14/10, 46, 48).

Lastly, Mr. Gustafson testified. He stated that he married the defendant approximately 30 years prior, and over the past 15 years was living in a garage of the defendant's that had been renovated into an apartment. (RP 11/12/10, 5-6). Mr. Gustafson testified that while there was an Assault charge and a No Contact Order in

place prohibiting him from the residence, there was a civil order that stated he was to retain or remain in the residence and that he was granted privileges in the front part of the house. (RP 11/12/10, 8-9). The victim stated that "it was approximately this time that [the defendant] informed me in no uncertain terms she was getting me out in one way or another." (RP 11/12/10, 9). Mr. Gustafson said when he returned to the residence after the No Contact Order was dropped, "virtually everything I owned had been stolen, save some electronics that had been taken out by friends of mine when I was first forced to move out." (RP 11/12/10, 9). Gustafson said the defendant was soon thereafter caught on camera at Hastings selling his missing property. (RP 11/12/10, 9). Gustafson prepared a list that contained the missing items that he could recall, but mentioned that every so often he will look for something and realize it is gone as well, and

those items were not included on the list. (RP 11/12/10, 10).

Gustafson stated that the ammunition was accumulated by him over a twenty-year span of time. Due to his military connections, he acquired military ammunition such as the Plus-P. (RP 11/15/10, 10-11). Gustafson "derived the value by going onto the net and going to a discount ammo and finding out how much it would cost me to replace them - - replace the ammunition." (RP 11/15/10, 11). Gustafson went on the internet to get replacement value for other items, and stated that some things, like the books, were determined by replacement value. (RP 11/15/10, 11). Gustafson noted that certain things that went missing, such as his Masonic Bible, were priceless and he did not put a price on those items. (RP 11/15/10, 11). The victim did not have much furniture, but that was gone; everything was gone, and the clothes he was wearing in court that day were acquired since the

incident. (RP 11/15/10, 11). The victim said the only thing on the list that had been replaced was a dagger, which the defendant had brought with her to court on the day of the hearing. (RP 11/12/10 10-12). The victim spoke in more detail about many of the objects on the list he prepared, including the Australian opals his mother had given him. (RP 11/12/10, 12). The defendant said the opals and a very heavy gold chain had been in his camper, and that whoever took those two things had to be looking for them as they would have to get down on their hands and knees and lay down on their side to get into where they were hidden. (RP 11/12/10, 12-13).

ARGUMENT

- 1. THE TRIAL COURT DID NOT ABUSE ITS DISCRETION WHEN IT SET RESTITUTION AT \$20,000.**

A trial court's restitution order is reviewed for an abuse of discretion. *State v. Davison*, 116 Wn.2d 917, 919, 809 P.2d 1374 (1991). A trial court abuses its discretion when

"the order of the court is manifestly unreasonable, or exercised on untenable grounds, or for untenable reasons. *State v. Cunningham*, 96 Wn.2d 31, 34, 633 P.2d 886 (1981).

In a 2005 case, the defendant, Ms. Lohr, pleaded guilty to first degree reckless burning, and was ordered to pay \$1,355,266.97 in restitution for damage to two hotels and several vehicles. The Court of Appeals, Division Three, held the Order was appropriate and not an abuse of discretion. In *Lohr*, the Court held that a crime victim's damages do not have to be foreseeable in order to support a restitution order. *State v. Lohr*, 130 Wn. App. 904, 125 P.3d 977 (2005). *Lohr* also held that while restitution must be based on easily ascertainable damages, the amount of harm or loss need not be established with specific accuracy. *Id.* When requesting a restitution order, the State must prove a preponderance of the evidence. *State v.*

Kinneman, 122 Wn. App. 850, 860, 95 P.3d 1277 (2004).

A trial court's authority to impose restitution is granted by statute. *State v. Moen*, 129 Wn.2d 535, 543, 919 P.2d 69 (1996).

RCW 9.94A.753(5) states that:

Restitution shall be ordered whenever the offender is convicted of an offense which results in injury to any person or damage to or loss of property or as provided in subsection (6) of this section unless extraordinary circumstances exist which make restitution inappropriate in the court's judgment and the court sets forth such circumstance in the record. In addition, restitution shall be ordered to pay for an injury, loss, or damage if the offender pleads guilty to a lesser offense or fewer offense and agrees with the prosecutor's recommendation that the offender be required to pay restitution to a victim of an offense or offense which are not prosecuted pursuant to a plea agreement.

In *State v. Gonzalez*, 168 Wn.2d 256, 226

P.3d 131, the Supreme Court of Washington held:

When the legislature enacted the restitution statute, it clearly stated its intent that victims be afforded legal protections at least as strong as those given criminal defendants. That

is, victims of crime were to be "honored and protected by law enforcement agencies, prosecutors, and judges in a manner no less vigorous than the protections afforded criminal defendants."

Id. at 265. In *Gonzalez*, the Court held that "the legislature's amendments to the restitution statute demonstrate that the legislature has consistently sought to ensure that victims of crimes are made whole after suffering losses caused by offenders and to increase offender accountability. *Id.*

On appeal, Ms. Grinstead relies on *State v. Griffith*, to argue the restitution amount set in the present case was inappropriate. *State v. Griffith*, 164 Wn.2d 960, 195 P.3d 506 (2008). This case is much different than *Griffith*. In *Griffith*, the defendant pleaded guilty to Possession of Stolen Property. The only witness to the crime presented by the State was a pawn store employee who testified:

Griffith came in the coin company with a "bag of stuff" and sold him some scrap gold for \$96. RP at 9-10. When

asked if he recalled seeing Mrs. Linscott's "two and a half carat diamond ring," he said he saw a similar ring with a large, diamond-like stone but did not examine it closely and could not say for certain it was Mrs. Linscott's. RP at 10. He remembered seeing the pearl necklace Griffith sold them and the Linscotts later recovered, but could not identify any of the other items listed in the police report as being in Griffith's possession. He also testified that if Griffith had a bag of gems with her, he likely would have remembered.

Id. at 964.

At the hearing in *Griffith*, the victim also testified. She stated that "\$11,000.00 worth of her jewelry was still missing, including a two and one-half carat diamond ring, a sapphire ring, a couple of amethyst rings, and a pearl ring. She said she understood Griffith was seen "carrying" these gems." *Id.*

After the pawn store employee testified, the court concluded that "\$11,500 of Elaine Linscott's property was identified by John Slaughter as having been in the defendant's

possession after the crime' and ordered Griffith to pay restitution in that amount." *Id.*

Griffith appealed on the grounds that insufficient evidence supported the restitution order. The Supreme Court in *Griffith* held the record showed that substantial evidence did not support the restitution order because although the victim said the defendant possessed \$11,000.00 worth of her jewelry, her testimony was based on what she understood the pawn shop employee saw, and the pawn store actually testified in direct contradiction to her belief. *Id.* at 966. Therefore, the Supreme Court held the evidence at the hearing was legally insufficient. *Id.* at 967.

In stating the holding, the Supreme Court found it important to note that Ms. Griffith plead guilty to Possession of Stolen Property in the Second Degree, rather than Burglary. *Id.* The Court cites to the Court of Appeals Decision in *Griffith*, which noted that "'culpability for

possession of stolen property does not necessarily include culpability for the stealing of the property. The actual thief is guilty of a different crime.' *Griffith*, 136 Wn. App. at 894, 151 P.3d 230 (Schultheis, J., dissenting)."
Griffith, 164 Wn.2d at 967. In making this distinction, the Court implies that if Ms. Griffith had plead guilty to Burglary or Theft, placing her restitution order at that amount might have been appropriate.

In contrast to *Griffith*, Ms. Grinstead plead guilty to Theft after she was accused in the State's Probable Cause Statement of taking almost all of the victim's personal property from his residence while he was away. (CP 1316-17). When Ms. Grinstead plead guilty, she specifically agreed when the judge asked her whether she was agreeing that the Probable Cause statement be relied upon to determine whether the plea was supported by the evidence. (RP 2/18/10, 6). That Probable Cause Statement was also relied

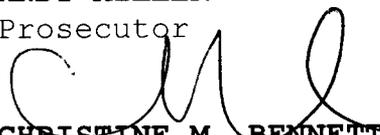
upon by the judge at the restitution hearing as a basis for determining the amount owed. (RP 04/13/11, 17). Four witnesses testified at lengthy restitution hearings regarding the property they observed before and after the theft, as well as the facts surrounding their disappearance.

CONCLUSION

The trial court did not abuse its discretion when it ordered Ms. Grinstead to pay Mr. Gustafson \$20,000.00 after she plead guilty to Theft in the Third Degree, and specifically agreed that the court could review the State's Probable Cause Statement to determine the basis for the plea. Therefore, the Restitutuion Order of \$20,000.000 should be affirmed.

RESPECTFULLY SUBMITTED this 21st day of May 2012.

ANDY MILLER
Prosecutor



CHRISTINE M. BENNETT, Deputy
Prosecuting Attorney
State Bar No. 41305
OFC ID No. 91004

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that on this day I served, in the manner indicated below, a true and correct copy of the foregoing document as follows:

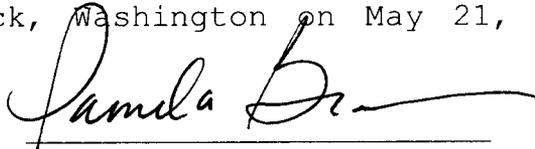
Janet G. Gemberling
Janet Gemberling PS
PO Box 9166
Spokane WA 99209-9166

E-mail service by agreement was made to the following parties:
admin@gemberlaw.com

Margaret J Grinstead
P O Box 4486
West Richland WA 99353

U.S. Regular Mail,
Postage Prepaid

Signed at Kennewick, Washington on May 21, 2012.



Pamela Bradshaw
Legal Assistant