

**FILED**  
SEP 30, 2014  
Court of Appeals  
Division III  
State of Washington

NO. 31579-7-III

COURT OF APPEALS, DIVISION III  
OF THE STATE OF WASHINGTON

---

STATE OF WASHINGTON, Respondent,  
v.  
JAIME SALVADOR SILVA-GONZALES, Appellant.

---

BRIEF OF RESPONDENT

---

Tamara A. Hanlon, WSBA #28345  
Senior Deputy Prosecuting Attorney  
Attorney for Respondent

TABLE OF CONTENTS

	PAGE
TABLE OF AUTHORITIES .....	ii
A. ASSIGNMENTS OF ERROR.....	1
ISSUES PRESENTED BY ASSIGNMENTS OF ERROR.....	1
B. STATEMENT OF THE CASE .....	
C. ARGUMENT .....	9
1. Defendant failed to prove that his attorney would provide material evidence unobtainable elsewhere. ....	9
2. Defense counsel’s motion to withdraw was untimely. ....	13
3. The court did not abuse its discretion in ruling that certain court documents were inadmissible. ....	14
4. The court did not abuse its discretion in denying the motion for a new trial.....	16
D. CONCLUSION .....	18

TABLE OF AUTHORITIES

PAGE

WASHINGTON CASES

Barbee v. Luong Firm, PLLC, 126 Wn. App. 148,  
107 P.3d 762 (2005).....14

Burnside v. Simpson Paper Co., 123 Wn.2d 93, 864 P.2d 937 (1994).....13,14

Hahn v. Boeing Co., 95 Wn.2d 28, 621 P.2d 1263 (1980) .....10

Kommavongsa v. Nammathao, 153 Wn. App. 461,  
220 P.3d 1283 (2009).....14

In re Det. of Duncan, 167 Wn.2d 398, 219 P.3d 666 (2009).....11

Public Util. Dist. No. 1 v. Int’l Ins. Co., 124 Wn.2d 789,  
881 P.2d 1020 (1994).....10,11,14

Roberts v. Atlantic Richfield Co., 88 Wn.2d 887, 568 P.2d 764 (1977) .....15

State v. Cook, 84 Wn.2d 342, 525 P.2d 761 (1974) .....10

State v. Etheridge, 74 Wn.2d 102, 443 P.2d 536 (1968) .....11

State v. Hawkins, 2014 Wash. LEXIS 602, 12-13 (Aug. 7, 2014) .....16

State v. Sanchez, 171 Wn. App. 518, 288 P.3d 351 (2012).....10,11,15

State v. Schmitt, 124 Wn. App. 662, 102 P.3d 856 (2004) .....10,11

State v. Smith, 101 Wn.2d 36, 677 P.2d 100 (1984) .....11

State v. Wimbish, 100 Wn. App. 78, 995 P.2d 626 (2000) .....11

State v. Thompson, 57 Wn. App. 688, 790 P.2d 180 (1990).....17

State v. Tobin, 161 Wn.2d 517, 166 P.3d 1167 (2007) .....10

FEDERAL CASES

United States v. Scheffer, 523 U.S. 303, 118 S. Ct. 1261,  
140 L. Ed. 2d 413 (1998), cert. denied, 131 S. Ct. 2873 (2011).....15

Washington v. Texas, 388 U.S. 14, 87 S. Ct. 1920,  
18 L. Ed. 2d 1019 (1967).....11

RULES

RPC 3.7.....9,10  
CrR 7.5.....16,17

**A. ASSIGNMENTS OF ERROR**

ISSUES PRESENTED BY ASSIGNMENTS OF ERROR

1. Did defendant fail to prove that his attorney would provide material evidence unobtainable elsewhere?
2. Was defense counsel's motion to withdraw untimely?
3. Was the court acting within its discretion in ruling that certain court documents were inadmissible?
4. Was the court acting within its discretion in denying the motion for new trial?

**B. STATEMENT OF THE CASE**

Silva-Gonzales was charged by information with first degree unlawful possession of a firearm, attempting to elude a pursuing police vehicle, and felony harassment. (CP 6-7).

The charges stem from events occurring on July 4, 2012, when officers responded to a report that a male pulled a gun on family members attending a barbeque. (CP 2). The suspect vehicle was identified as a white Ford Taurus with Washington plate AHF9770. (CP 2). Officer Ceja saw the vehicle traveling at a high rate of speed. (CP 2). A chase ensued in which the driver of the vehicle, Silva-Gonzales, fled from officers while breaking multiple traffic laws. (CP 2). Silva-Gonzales, who was not wearing a shirt, stopped on a bridge over the Yakima river.

(RP 137, 154; CP 2). He and his passenger, Marisela Mora, jumped into the river. (CP 2). They were rapidly swept downstream. Officers rescued them and took them into custody. (RP 2).

An unloaded .22 caliber rifle was found in the truck of the vehicle. (RP 202). In the driver's seat was a men's short-sleeved shirt with .22 long rifle rounds in the pocket of the shirt. (RP 197). The car was registered to Silva-Gonzales. (RP 145).

Marisela Mora was interviewed by officers. (CP 82). She claimed that the rifle and ammunition belonged to her and that she had received the rifle six weeks prior. (CP 82). She refused to say where she got the rifle from. (CP 82). She maintained that she put the rifle in the trunk of Silva-Gonzales' car without his knowledge. (CP 82).

Silva-Gonzales was arrested and booked into jail on the charges. (RP 82). While in jail, he made some incriminating phone calls. (RP 83). Brief portions of two calls, one made on July 19, 2012 and one made on July 20, 2012, were admitted at trial. The segment of the July 19, 2012 call that was admitted is as follows:

MR. SILVA: The main reason I wanted to talk to you is because I want to know what -- I want to know what it is that is in the report that --

FEMALE: Yeah.  
MR. SILVA: -- he's got.  
FEMALE: Uhm-hm.  
MR. SILVA: And then I need him to find out what's in the report on my home girl case, exactly word for word --  
FEMALE: Uhm-hm.  
MR. SILVA: -- you know, that's the case.  
FEMALE: (Inaudible).  
MR. SILVA: Yeah, I know, but I know that when I -- as soon as I get out, I gotta take care of her and send her money and shit, too, because man she's saying everything was hers, you know.  
FEMALE: Yes.  
MR. SILVA: That's fucking -- that's some down ass shit --

The portion of the July 20, 2012 call that was admitted is as follows:

MR. SILVA: It was my vehicle. I knew I shouldn't have put that fucking car in my name. Anyway, um, the only thing just looking back the car was in your name, I said yeah, but I said that we both know that the reason that it's locked up with something, it's not in the -- it's not the same thing as it being in a common area.

(RP 266).

The defense attorney received CDs of these calls well in advance of trial. (RP 187; CP 84). In fact, he conceded this fact on the record. (RP 187). At the same time, the prosecutor gave him an outline of what was in the phone calls that he wanted to admit at trial. (RP 4, 187; CP 84).

The defense attorney told the court he did not see anything in the calls that was terribly inculpatory or exculpatory. (RP 4).

During pre-trial motions on March 25, 2013, the issue of jail phone calls was raised. (RP 4). The court and counsel were given the audio clips of the specific segments the prosecutor intended to play for the jury. (RP 187; CP 85; CP 98). One of the calls was regarding Silva-Gonzales telling someone that Ms. Mora needed to be “taken care of.” (RP 5). The nature of the call was summed up in pre-trial briefing:

On July 19th, 2012, Mr. Silva-Gonzalez made a recorded telephone call from the County Jail to his girlfriend Victoria. At this point in time, Mr. Silva-Gonzalez knew that his appointed attorney was Etoy Alford but he had not yet spoken to him. In his conversation, he spoke of his need to contact his attorney and to get a bail hearing set up as soon as possible. He told her that he needed to find out what’s in his police reports, what particularly he stressed to her the need to find out all the details in his home girl’s police reports. He told her her that he needs to know exactly word for word what she told the police, meaning Ms. Mora, because she’s saying everything was hers. When he said this, the defendant stretched the word everything and because of all this Mr. Silva-Gonzalez said he needed to take care of her and send her money.

(RP 5-6; CP 85).

The prosecutor informed the defense attorney that he was definitely going to be using that call. (RP 5; CP 85). The defense attorney raised two concerns about the jail phone calls: 1) that the jury will learn his client is in jail, and 2) that they will hear him using foul language. (RP 7). The trial judge said he would listen to objections, but that based on his review of the calls, they were relevant and their probative value outweighed any prejudicial effect. (RP 184.)

The next day, on March 28, the court heard arguments on the issue. The defense moved to suppress the jail phone calls on various grounds. (RP 187-193). The first basis was that the jail phone calls contained Silva-Gonzales cursing, specifically, using the words “shit” and “fucking.” (RP 188). The second basis was that the July 20 call was innocuous—neither inculpatory or exculpatory. The third basis was that the jury would know Silva-Gonzales was in jail. (RP 188). The fourth basis was that the jail phone call system violated the privacy rights of inmates. (RP 189).

During this March 28, 2013 hearing, the defense attorney stated that one call was about a conversation he had with Silva-Gonzales. (RP 188). But counsel did not move to withdraw. (RP 187-193). Rather, counsel said is that it puts *his client* in a position where he needs to testify. (RP 191). There was no mention of the attorney having to testify.

The court denied the motion to suppress and offered to give a limiting instruction to the jury regarding the fact that the phone calls were made from the jail. (RP 191). In addition, the judge found no violation of Silva-Gonzales' privacy rights. (RP 192). There was also no problem with his use of a few curse words during the calls. (RP 191).

Later, on that same date, March 28, 2013, during Sgt. Welch's testimony, the defense attorney asked for a sidebar and made a motion to withdraw due to a conflict of interest. (RP 257). The request was denied as untimely. (RP 257). Testimony continued and the defense later made a record of the sidebar outside the presence of the jury. (RP 270-71). The defense attorney told the court that he spoke to his client, who in turn relayed certain facts to a third party, and that those facts were heard in the jail phone call played for the jury. (RP 272).

The trial judge held that it was too late to move to withdraw. (RP 271). The judge found that the defense had been aware of the conversation "for weeks or months on end" and yet, did not make a motion until shortly before the State was about to rest. (RP 271). In fact, the court noted that the motion appeared to have been intentionally raised at the last moment. (RP 272).

The court also found that the issue raised was regarding an “innocuous portion of the conversation that was recorded and then played subsequently for the jury.” (RP 271). The court stated that it was “innocuous in the extreme” and concluded that there was no necessity to reference *who* the defendant had been talking to. (RP 271).

The trial continued and the defense presented their case. They called Marisela Mora who testified that the rifle was hers and that she had placed it in the trunk without the defendant’s knowledge. (RP 294-7). Silva-Gonzales chose not to testify. (RP 315).

During the defense case, Silva-Gonzales sought to admits orders showing 1) his bail amount, 2) his arraignment date, 3) the date counsel was appointed, and 4) that the defendant, prosecutor, and defense counsel were present at arraignment. (RP 315-16). The defense argued that the orders showed: 1) why his client was in jail, 2) that there was a court date the same day as the July 20 call, and 3) that date counsel was appointed (RP 316-7). The prosecutor objected on the grounds of relevance. (RP 316; CP 87).

The judge sustained the objection and ruled that the documents were inadmissible. (RP 317; CP 87). The court decided that the records were not admitted for 1) reasons previously stated, and 2) a lack of

timeliness. (RP 317). The court found the records not pertinent to the jail phone call made on July 20. (RP 317-18).

In closing arguments, defense counsel argued that the July 20 conversation was about what was said between him and Silva-Gonzales. (RP 371).

Silva-Gonzales was convicted of first degree unlawful possession of a firearm and attempting to elude a pursuing police vehicle. (CP 62-63). He was found not guilty of felony harassment. (CP 65).

On April 8, 2013, Silva-Gonzales filed a motion for new trial. (CP 68-72). Defense counsel indicated that he was a necessary witness regarding the July 20, 2012 phone call. (CP 69). However, he never indicated what he would have testified too. (CP 69).

The State filed a reply to his motion. (CP 77-98). The State pointed out that defense counsel never informed the court of the specific content of his proposed testimony. (CP 86, 88-89). The State argued that there was no showing that he could testify to any relevant evidence. (CP 89). Further, the State listed multiple ways to explain the jail phone calls that did not involve the defense attorney having to testify. (CP 89).

The defense replied to the State's memorandum. (CP 101-2). In his written reply, Silva-Gonzales continued to argue for a new trial, but again, failed to specify what his attorney would have testified too and why that testimony was necessary. (CP 101-2).

On April 11, 2013, oral arguments were heard on the motion for new trial. (4/11/13 RP 402-9). Silva-Gonzales reiterated his prior arguments why the calls should have been suppressed. (4/11/13 RP 402-8). The court, however, denied his motion. The judge ruled that 1) the circumstances of the calls were obvious to everyone, 2) the request for a new attorney was merely an attempt for a mistrial, and 3) that the closing arguments cured any prejudice if there was any. (4/11/13 RP 408-9).

This appeal followed. (CP 67).

### **C. ARGUMENT**

#### **1. Defendant failed to prove that his attorney would provide material evidence unobtainable elsewhere.**

Silva-Gonzales contends that the trial court's order violated RPC 3.7, the lawyer-as-witness rule. That substance of that rule is as follows:

#### **Rule 3.7. Lawyer as witness**

(a) A lawyer shall not act as advocate at a trial in which the lawyer is likely to be a **necessary witness** unless....

- (1) the testimony relates to an uncontested issue;
- (2) the testimony relates to the nature and value of legal services rendered in the case;
- (3) disqualification of the lawyer would work substantial hardship on the client; or
- (4) the lawyer has been called by the opposing party and the court rules that the lawyer may continue to act as an advocate.

Rule 3.7 (emphasis added).

However, Washington courts have inherent power to determine who may appear before them as legal counsel. State v. Sanchez, 171 Wn. App. 518, 560, 288 P.3d 351 (2012) (citing Hahn v. Boeing Co., 95 Wn.2d 28, 31, 621 P.2d 1263 (1980); State v. Cook, 84 Wn.2d 342, 525 P.2d 761 (1974)). As explained in Sanchez:

A lawyer may be disqualified as an advocate at trial where he or she is likely to be a necessary witness. PUD No. 1, 124 Wn.2d at 811-12; see RPC 3.7; CR 43(g). A trial court's ruling disqualifying counsel who is likely to be a necessary witness is reviewed for abuse of discretion. PUD No. 1, 124 Wn.2d at 812. Discretion is abused when it is exercised on untenable grounds or for untenable reasons. State v. Schmitt, 124 Wn. App. 662, 666, 102 P.3d 856 (2004). Discretion also is abused when it is exercised contrary to law. State v. Tobin, 161 Wn.2d 517, 523, 166 P.3d 1167 (2007).

Sanchez, 171 Wn. App. at 546.

The broad latitude given to the trial court to enforce Sixth Amendment rights accords with the court's authority to decide disqualification motions in conflict situations. Sanchez, 171 Wn. App. at 560. A court's exercise of discretion is viewed not in hindsight, but in view of the circumstances before the court at the time of its decision. See In re Det. of Duncan, 167 Wn.2d 398, 408, 219 P.3d 666 (2009). Generally, a court should not disqualify an attorney absent compelling circumstances. State v. Schmitt, 124 Wn. App. 662, 666-67, 102 P.3d 856 (2004) (citing Public Util. Dist. No. 1 v. Int'l Ins. Co., 124 Wn.2d 789, 812 (1994)). To demonstrate compelling circumstances, a party must show that the attorney will provide material evidence unobtainable elsewhere. Id.

Although a criminal defendant enjoys the right to present witnesses, this right is limited to "those witnesses who are material to the defense." State v. Smith, 101 Wn.2d 36, 41, 677 P.2d 100 (1984) (citing Washington v. Texas, 388 U.S. 14, 23, 87 S. Ct. 1920, 18 L. Ed. 2d 1019 (1967)). The defendant bears the burden of proving materiality, which is accomplished by establishing a colorable need for the person to be summoned. Smith, 101 Wn.2d at 42. A defendant "must present specific facts to which the witnesses would testify." State v. Wimbish, 100 Wn.

App. 78, 85, 995 P.2d 626 (2000) (citing State v. Etheridge, 74 Wn.2d 102, 112, 443 P.2d 536 (1968)).

This record, however, contains no showing that Silva-Gonzales' trial attorney was "likely to be a necessary witness." He has failed to demonstrate how the testimony would have been beneficial to his defense. The only suggestion made by Silva-Gonzales is that his attorney's testimony was necessary to "put the jail phone calls into context." (App.'s brief at 11). Appellant claims that "these circumstances *may* be critical to the jury's determination of whether he knew the rifle was in the trunk." (App.'s. brief at 11) (emphasis added). However, there are no references at all in Appellant's brief as to what *exactly* his trial attorney was going to testify too. There simply are no specific facts given.

If his attorney was going to testify that he was the source of the information relayed in the July 20 call, there was no link provided to show how this testimony was necessary for his defense. Here is the entire July 20 call:

MR. SILVA: It was my vehicle. I knew I shouldn't have put that fucking car in my name. Anyway, um, the only thing just looking back the car was in your name, I said yeah, but I said that we both know that the reason that it's locked up with

something, it's not in the -- it's not the same thing as it being in a common area.

(RP 266).

There was no dispute that Silva-Gonzales made the statements in the phone call. In the call, he admits it was his vehicle and that he should not have put the car in his name. Officers also testified that the car was registered to him. (RP 145). It does not matter *who* he was talking to prior to the call. Silva-Gonzales was also given the choice whether to testify or not. He chose not to. (RP 315). He could have provided background information as to that call, assuming he could show the relevance of the information.

In sum, admission of evidence is well within the trial court's discretion. Burnside v. Simpson Paper Co., 123 Wn.2d 93, 107, 864 P.2d 937 (1994). The trial judge came to the reasonable conclusion that additional testimony was not necessary to explain the call. (RP 272). That was within the court's discretion. Silva-Gonzales has not shown that there was any abuse of discretion in his case. As such, the trial judge's decision should be upheld.

**2. Defense counsel's motion to withdraw was untimely.**

Moreover, the trial court did not err in finding that defense counsel's motion to withdraw was untimely. "[T]he trial court has

discretion to require [an attorney] to determine in a timely manner if he will have to testify on behalf of his clients.” Kommavongsa v. Nammathao, 153 Wn. App. at 468 (citing Barbee v. Luong Firm, PLLC, 126 Wn. App. 148, 160, 107 P.3d 762 (2005)).

Here, Silva-Gonzales had ample time to investigate and procure the presence of any material witnesses, including his attorney. In fact, the defense had been aware of the conversation and yet, did not make a motion until shortly before the State was about to rest. (RP 271). More specifically, the judge found that the issue had been within the knowledge of the defense for weeks, possibly months. (RP 272). The court’s impression was that the motion was intentionally made at the last moment in order to secure a mistrial. (RP 272, 4/11/13 RP 408-9). There has been no showing that the trial court exceeded the broad latitude which must be accorded it in making this decision.

**3. The court did not abuse its discretion in ruling that certain court documents were inadmissible.**

It is well established that the trial court may properly exclude evidence which would have a tendency to mislead, distract, confuse, waste time, or be too remote. Public Util. Dist. No. 1 v. Int’l Ins. Co., 124 Wn.2d 789, 813-814, 881 P.2d 1020 (1994). Such rulings will not be disturbed on appeal absent a showing of abuse of discretion. Id. (citing

Roberts v. Atlantic Richfield Co., 88 Wn.2d 887, 568 P.2d 764 (1977)).

The right to present a complete defense...does not mean that a defendant may introduce whatever evidence he wishes...” Sanchez, 171 Wn. App. at 554 (2012) (citing United States v. Scheffer, 523 U.S. 303, 308, 118 S. Ct. 1261, 140 L. Ed. 2d 413 (1998)), cert. denied, 131 S. Ct. 2873 (2011)).

Here, the trial court excluded testimony it found to be speculative and irrelevant, and, as noted above, the court provided cogent reasons, supported by the record, for its rulings. It is unclear how admission of any of the three documents would have helped Silva-Gonzales. His attorney argued that he needed to show why his client was in jail—due to a high bond. Despite motions to exclude the jail phone calls because it would show that Silva-Gonzales was in jail, it is unclear why his attorney would want to reemphasize the fact that Silva-Gonzales was in jail. The fact that a high bail was set was completely irrelevant to his case.

Counsel’s other argument at trial was that the jury needed to know that there was a court date sometime on July 20, 2012, the same date as the jail phone call. However, he never explained what the jury was supposed to gain by having that information or what conclusions he hoped they would come to. There simply were no specific reasons given why the jury needed to have this information. The same goes for the date counsel

was appointed and who was present at arraignment. There was nothing provided to the court in terms of why these documents were relevant or what was to be inferred from them.

In sum, the court correctly ruled that all three documents were inadmissible. That was a decision within the court's broad discretion. Therefore, there was no abuse of discretion committed by the trial court.

**4. The court did not abuse its discretion in denying the motion for a new trial.**

The standard of review for motions for new trial was set forth recently in State v. Hawkins, 2014 Wash. LEXIS 602, 12-13 (Wash. Aug. 7, 2014):

We review a trial court's decision whether or not to grant a new trial for abuse of discretion. *State v. Williams*, 96 Wn.2d 215, 221, 634 P.2d 868 (1981). A trial court's wide discretion in deciding whether or not to grant a new trial stems from "the oft repeated observation that the trial judge who has seen and heard the witnesses is in a better position to evaluate and adjudge than can we from a cold, printed record." *State v. Wilson*, 71 Wn.2d 895, 899, 431 P.2d 221 (1967).

...

This policy makes sense, as trial courts have a strong interest in preserving the finality of their judgments as well as preventing their dockets from becoming overcrowded with meritless retrials.

Appellant argues that a new trial was warranted under CrR 7.5(a)(5), (6)

and (8). The pertinent parts of that rule are as follows:

Rule 7.5. New trial

(a) *Grounds for new trial.* The court on motion of a defendant may grant a new trial for any one of the following causes when it affirmatively appears that a substantial right of the defendant was materially affected:

...

(5) Irregularity in the proceedings of the court, jury or prosecution, or any order of court, or abuse of discretion, by which the defendant was prevented from having a fair trial;

(6) Error of law occurring at the trial and objected to at the time by the defendant;

...

(8) That substantial justice has not been done. When the motion is based on matters outside the record, the facts shall be shown by affidavit.

In State v. Thompson, 57 Wn. App. 688, 696-697, 790 P.2d 180

(1990), a defendant requested a retrial due to the unavailability of a defense witness. Division Three noted the following:

Mr. Thompson admits that he was aware at the time of trial this witness would be important to his case. He further acknowledges he acquired a written statement from him and that no subpoena was requested or issued for this witness until after the trial was initiated. By that time, the defense was unable to secure the witness. We find based on this evidence that a new trial is not appropriate under CrR 7.6(a)(3). The defense was aware of this witness prior to trial and could have made a greater

attempt to secure his testimony.

Similarly, defense counsel in the case at hand acknowledged on the record that he received the jail calls well in advance of trial. (RP 187). There is no explanation given for why any potential conflicts were not discovered prior to trial and brought to the court's attention after reviewing the calls prior to trial. Furthermore, Silva-Gonzalez argues that his attorney had necessary testimony to put the "jail phone calls evidence in context." (App.'s brief at 11). But he has not explained why putting the calls in context was necessary. Similarly, he has not explained how the court documents refute jail phone call evidence, other than to say he had innocent reasons to want to see the police reports. At trial, those "innocent reasons" were not put on the record. And still, on appeal those "innocent reasons" have not been set forth. The argument for a new trial was vague at trial and untimely made. Given that the court has broad discretion in deciding whether to grant a new trial or not, the trial court correctly denied the appellant's motion for new trial.

#### **D. CONCLUSION**

Based on the above arguments, the trial court did not abuse its discretion in denying Silva-Gonzales' motion for new trial. As such, the

State respectfully requests that this court affirm the convictions and sentence in this matter.

DATED: September 30, 2014.



TAMARA A. HANLON  
WSBA # 28345  
Senior Deputy Prosecuting Attorney  
Yakima County, Washington  
Attorney for Respondent

## DECLARATION OF SERVICE

I, Tamara A. Hanlon, state that on September 30, 2014, by agreement of the parties, I emailed a copy of the State's Brief of Respondent to Ms. Susan Marie Gasch at [gaschlaw@msn.com](mailto:gaschlaw@msn.com).

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 30th day of September, 2014 at Yakima, Washington.



TAMARA A. HANLON, WSBA  
#28345  
Senior Deputy Prosecuting Attorney  
Yakima County, Washington  
128 N. Second Street, Room 329  
Yakima, WA 98901  
Telephone: (509) 574-1210  
Fax: (509) 574-1211  
[tamara.hanlon@co.yakima.wa.us](mailto:tamara.hanlon@co.yakima.wa.us)