

NO. 37112-0

**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

STATE OF WASHINGTON, RESPONDENT

v.

DEDRICK THOMAS, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Frank E. Cuthbertson

No. 07-1-00219-9

FILED
COURT OF APPEALS
DIVISION II
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STATE OF WASHINGTON
BY _____
DEPUTY

BRIEF OF RESPONDENT

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Table of Contents

A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR. 1

 1. Is the unit of prosecution for witness tampering each attempt to influence a witness's testimony where the legislature intended to proscribe the coercive nature of such an act and where the facts in this case show an escalating pattern of tampering with additional attempts to manipulate the testimony in each tampering act? 1

B. STATEMENT OF THE CASE. 1

 1. Procedure..... 1

 2. Facts2

C. ARGUMENT.....8

 1. THE UNIT OF PROSECUTION FOR WITNESS TAMPERING IS EACH CONTACT MADE WITH THE ATTEMPT TO ALTER OR CHANGE THE TESTIMONY OF THE WITNESS.....8

D. CONCLUSION.16

Table of Authorities

State Cases

<i>In re Pers. Restraint of Davis</i> , 142 Wn.2d 165, 172, 12 P.3d 603 (2000)	9
<i>State v. Adel</i> , 136 Wn.2d 629, 634, 965 P.2d 1072 (1998)	9
<i>State v. Bobi</i> , 140 Wn.2d 250, 263-66, 996 P.2d 610 (2000)	12
<i>State v. Root</i> , 141 Wn.2d 701, 710, 9 P.3d 214 (2000)	9
<i>State v. Stroh</i> , 91 Wn.2d 580, 583-84, 588 P.2d 1182, 8 A.L.R.4th 760 (1979)	10
<i>State v. Tili</i> , 139 Wn.2d 107, 113, 985 P.2d 365 (1999)	9
<i>State v. Varnell</i> , 162 Wn.2d 165, 167, 170 P.3d 24 (2007)	11, 12, 14
<i>State v. Westling</i> , 145 Wn.2d 607, 610, 40 P.3d 669 (2002)	9
<i>State v. Whitfield</i> , 132 Wn. App. 878, 134 P.3d 1203 (2006), review denied, 2007 Wash. LEXIS 195 (Wash., March 7, 2007)	10

Federal and Other Jurisdictions

<i>Bell v. United States</i> , 349 U.S. 81, 84, 75 S. Ct. 620, 99 L. Ed. 905 (1955)	9
<i>United States v. Universal C.I.T. Credit Corp.</i> , 344 U.S. 218, 225-26, 73 S. Ct. 227, 97 L. Ed. 260 (1952)	9

Statutes

LAWS OF 1994, ch. 271, sec. 201	13
RCW 26.50.110(1)	1
RCW 9A.28.020(1)	10
RCW 9A.28.030(1)	11

RCW 9A.72.090	12
RCW 9A.72.110	12
RCW 9A.72.120	12
RCW 9A.72.120(1)(a)	1, 10

A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.

1. Is the unit of prosecution for witness tampering each attempt to influence a witness's testimony where the legislature intended to proscribe the coercive nature of such an act and where the facts in this case show an escalating pattern of tampering with additional attempts to manipulate the testimony in each tampering act?

B. STATEMENT OF THE CASE.

1. Procedure

DEDRICK DEMOND THOMAS, hereinafter referred to as defendant, is confined pursuant to a judgment and sentence entered in cause no. 07-1-00219-9, Pierce County Superior Court, for the offenses of tampering with a witness (eight counts), and violation of no contact order, (four counts). CP 62, 64, 71-75.

Defendant was charged by information with eight counts of tampering with a witness, contrary to RCW 9A.72.120(1)(a), for events surrounding a telephone conversation he had with the victim, Victoria Montgomery, during the trial for defendant on first degree assault of Ms. Montgomery. CP 1-6. Defendant was also charged with four counts of violation of a no contact order, contrary to RCW 26.50.110(1). CP 1-6.

The matter came before the Honorable Frank Cuthbertson for trial on August 14, 2007. 1RP 1.¹

On August 23, 2007, the defendant was convicted as charged. 6RP 299-300, Vol. VI, CP 62, 64, 71-75.

On November 8, 2007, defendant came before Judge Cuthbertson for sentencing. RP 2, 11/8/06.² Defendant received a standard range sentence of 365 months on each of the misdemeanor convictions for violation of no contact order. CP 71-75. On the tampering with a witness convictions, defendant received a sentence of 60 months, each count, concurrent to each other and concurrent to the misdemeanor convictions. CP 62, 64.

2. Facts

This case stems from defendant's conduct from jail while he was facing criminal charges. 4RP 138-139. The state charged defendant with the crimes of first and second degree assault for the brutal beating of his girlfriend, Victoria Montgomery. 4RP 138-139. The State also charged

¹ There were eight volumes of transcripts filed in this matter. The State will refer to volumes 1-6, as 1RP, 2RP, etc.

The State will refer to the November 2, 2007, hearing as 11/2/07.

The transcripts filed for the November 8, 2006 hearing are not numbered. The State will refer to this as 11/8/07 (it appears the hearing occurred in 2007, and not 2006 as the cover page states), and begin with page 1 as the cover page, and in numerical order following page 1.

defendant with a third count of assault for defendant pulling a knife on Johnny Bryant several days afterwards, and a charge of felony harassment for defendant threatening to kill Mr. Bryant while talking on the phone to Victoria's mother, Elizabeth. 4RP 139.

As trial drew near in the above matter, Victoria lost contact with the prosecution. 4RP 140. A warrant was issued for her arrest. 4RP 140. On January 3, 2007, Victoria took the witness stand and testified to this beating. 4RP 141.

Johnny Bryant, also known as "J," testified. RP 147, 110-111. Johnny was engaged to be married to Victoria's sister, Maria. 4RP 147. Several days after the incident Johnny and Maria were driving to the hospital to visit Victoria and they saw defendant on the street. 4RP 148. Johnny attempted to tell the defendant to stay there while Maria called the police and defendant pulled a knife on Johnny. 4RP 148. Defendant fled after Johnny pulled out a gun. 4RP 148.

Shortly following Victoria's testimony, beginning on January 6, 2007, defendant made several telephone calls to her from the Pierce County Jail in an attempt to persuade her to change her testimony. 4RP 114. A series of 36 calls were made over a three day period. Pl. Ex. 6; CP 82. The calls detail an increasingly desperate person who each time, attempts in a different way to persuade Ms. Montgomery to change her testimony. Pl. Ex. 2, CP 82. After two days of telephone calls, Victoria was still unsure whether she was going to go ahead with the recantation of

testimony because she had told everybody the truth before and she did not want to get anyone else in trouble. 4RP 184. Defendant went so far as to pressure her to write a letter recanting her testimony and providing it to defense counsel Kent Underwood. 4 RP 149, Ex. 4, 4RP 177-178. Ms. Montgomery was scared about writing the letter because it was a false statement. 5RP 193. After defense counsel shared a copy of the letter with the prosecution in the case, authorities began to investigate the telephone calls made from jail. 4RP 150.

All of the calls are digitally recorded from the Pierce County Jail, and generally contain a warning that all matters are being recorded. 4RP 150, Ex. 2. The prosecutor reviewed the calls made from defendant to Victoria. 4RP 150-51. The prosecutor confronted defense counsel with these calls, in which the defendant was trying to persuade Victoria to say certain things in her testimony. 4RP 151. Based on this revelation, defense counsel decided not to call Victoria to the stand. 4RP 151. However, Victoria was brought into court outside the presence of the jury and the jail recordings were played. 4RP 151. She was able to identify her voice as well as defendants. 4RP 151.

During the current trial, the State played telephone calls for the jury. A chart was admitted that documented the calls which supported each count. Ex. 7, CP 82. Below is a summary of the content of those calls between defendant and Ms. Montgomery:

COUNT I³

This recording documents defendant's initial phone calls to Victoria where he tells her that his attorney is going to call her back to the stand to say that he was only defending himself. 1/6/07, **20:22**/1:49, Ex. 2. He explains that the reason he hit her with a stick was to stop her. 1/6/07, **20:44**/13:20; 4RP 122.

COUNT II

Defendant begins to expand on what he wants Victoria's new testimony to be, including that she needs to help him out with the other charges involving Jay and Maria, and say that he did not have a knife at the time of the confrontation. 1/6/07, **21:38**/4:00, 8:41, RP 131. He reiterates that she has to say that he was defending himself and that the only time he was hitting her is when she was hitting him. 1/6/07, **21:38**/7:20, 4RP 131.

³ Because of the nature of the record, and the number of counts, the record is somewhat daunting in this matter. The State has attempted to be as clear as possible in the recitation of facts with respect to each count and evidence. All of the cites listed for each count above come from Plaintiff's Exhibit 2. CP 82. There was no transcript of the phone calls entered into the record. Plaintiff's Ex. 7, documents the calls made and how those calls are linked to each count. The state will cite to the phone calls as follows: **DATE/TIME CALL MADE/DURATION OF CALL**; e.g. 1/6/07 (date), **20:22** (time of call)/1:49 (duration of call). The last number is an estimation of the clock counter provided in exhibit 2 when the tape is played. The State only references the beginning start time of when a fact is stated, and not an end time.

COUNT III

At this point defendant gets rid of the self-defense story and opts for a story that his cousin "Kevin" beat and raped Victoria. 1/7/07, **9:41/2:30**, 4RP 135, 139. Defendant explains that she needs to say that she was scared for her life so she told the police it was defendant. 1/7/07, **9:41/0:41**, 4RP 135, 139. Defendant then dictates a letter for her to write. 1/7/07, **9:41/15:14**, 4RP 135, 139. He explains reason she lied was because she was scared that the cousin might find where she is staying and kill her and the kids. 1/7/07, **9:41/15:14**, 4RP 135-39.

Defendant calls her again and explains that he will ask his attorney what he needs in order to be found not guilty. 1/7/07, **10:02/3:18**, 4RP 139. He assures her that he needs the letter soon and explains that she does not need to worry about evidence from a rape kit because he read the medical report. 1/7/07, **10:02/6:13**, 7:07, 4RP 139.

Defendant calls again and urges her to mail the letter and explains that he feels stupid because he hurt the only person he loves. 1/7/07, **11:53**, 4RP 155.

Defendant calls again and pressures her about explaining away the knife during the incident with himself and Jay. 1/7/07, **12:52/6:08**, 9:00, 9:40, 4RP 168. Defendant also concocts that one of the reasons she said it was defendant, and not his cousin, is because she was mad at him for cheating. 1/7/07, **12:52/17:12**, 4RP 168.

COUNT IV.

Defendant attempts to fine-tune her motive for lying and also puts pressure on her by telling her that he is looking at 19-26 years in prison. 1/7/07, **18:58**/3:45, 4:03; 1/7/07, **19:30**/14:30; 1/7/07, 4RP 175, 178. Defendant explains to her that she needs to take the letter to his lawyer and tell them that his mother gave her his attorney's address. 1/7/07, **20:01**/0:38, 7:33, 4RP 179. Defendant decides that he wants the letter directed to his attorney, rather than to him. 4RP 180.

Defendant makes a series of phone calls where he is emboldened that he is going to win his case (1/7/07, **20:43**, 00:49, 3:19, 4RP 181); goes over the story with her again (1/7/07, **21:06**, 4RP 182); and reassures her that his attorney will have confidentiality with her, and that she is not going to go to jail for filing a false police report. 1/7/07, **21:26**/2:33, 11:45, 12:28, 4RP 183.

COUNT V

The following day defendant calls with the idea that the reason Victoria is telling the truth now is because she does not want to see an innocent man go to jail. 1/8/07, **12:13**/5:39, 4RP 194. Defendant tells Victoria that she has to do this so he does not die. 1/8/07, **12:48**/7:35, 4RP 196.

COUNT VI

During this conversation defendant goes into the most detail with Victoria regarding what exactly her story should be and what her motive was for lying. 1/8/07, **18:24** and **19:30**, 4RP 198-199. Defendant adds details to the story, including that his cousin Kevin made her take a shower after the rape (1/8/07, **19:38/9:09**, 4RP 199). Defendant tells her at what points in the testimony she should cry and offers an explanation for why she said defendant held a knife to her throat (1/8/07, **19:38/9:09**, 10:53, 4RP 199).

COUNT VII

Defendant tells her that Kevin raped and beat her and the reason he did this was because Kevin wanted money. 1/9/07, **8:12/9:50**, 4RP 204.

COUNT VIII

Defendant explains to her that the reason she got the protection order was because her family wanted her to. 1/9/07, **8:54/5:00**, 4RP 205.

C. ARGUMENT.

1. THE UNIT OF PROSECUTION FOR WITNESS TAMPERING IS EACH CONTACT MADE WITH THE ATTEMPT TO ALTER OR CHANGE THE TESTIMONY OF THE WITNESS.

“Double jeopardy principles protect a defendant from being convicted more than once under the same statute if the defendant commits

only one unit of the crime.” *State v. Westling*, 145 Wn.2d 607, 610, 40 P.3d 669 (2002) (citing *State v. Adel*, 136 Wn.2d 629, 634, 965 P.2d 1072 (1998)). Accordingly, in order to resolve whether double jeopardy principles are violated when a defendant is convicted of multiple violations of the same statute, a court must determine what “unit of prosecution” the legislature intends to be the punishable act under the statute. *Westling*, 145 Wn.2d at 610; *In re Pers. Restraint of Davis*, 142 Wn.2d 165, 172, 12 P.3d 603 (2000); *State v. Tili*, 139 Wn.2d 107, 113, 985 P.2d 365 (1999); *Adel*, 136 Wn.2d at 634. The unit of prosecution for a crime may be an act or a course of conduct. *United States v. Universal C.I.T. Credit Corp.*, 344 U.S. 218, 225-26, 73 S. Ct. 227, 97 L. Ed. 260 (1952); *State v. Root*, 141 Wn.2d 701, 710, 9 P.3d 214 (2000); *Adel*, 136 Wn.2d at 634.

In determining legislative intent as to the unit of prosecution, a court first looks to the relevant statute. The meaning of a plain, unambiguous statute must be derived from the statutory language. *Westling*, 145 Wn.2d at 610. If a statute is ambiguous as to the unit of prosecution, the rule of lenity requires that any ambiguity must be “resolved against turning a single transaction into multiple offenses.” *Adel*, 136 Wn.2d at 635 (quoting *Bell v. United States*, 349 U.S. 81, 84, 75 S. Ct. 620, 99 L. Ed. 905 (1955)).

As charged in this case, the elements of witness tampering are:

(1) A person is guilty of tampering with a witness if he or she attempts⁴ to induce a witness or person he or she has reason to believe is about to be called as a witness in any official proceeding or a person whom he or she has reason to believe may have information relevant to a criminal investigation or the abuse or neglect of a minor child to:

(a) Testify falsely or, without right or privilege to do so, to withhold any testimony;

RCW 9A.72.120(1)(a).

Knowledge that the person approached is a witness is an implied element of the crime of witness tampering; intent, however, is not. *State v. Stroh*, 91 Wn.2d 580, 583-84, 588 P.2d 1182, 8 A.L.R.4th 760 (1979).

Although the issue of unit of prosecution was not squarely before this court in *State v. Whitefield*, this court upheld the convictions for two counts of tampering with a witness based on two separate telephone calls, occurring approximately a week apart, where defendant called his victim twice and told her in the first conversation to testify that she knew about his HIV diagnosis, and in the second conversation to say that the sex was consensual. 132 Wn. App. at 897.

⁴ Attempt is defined as: "A person is guilty of an attempt to commit a crime if, with intent to commit a specific crime, he or she does any act which is a substantial step toward the commission of that crime." *State v. Whitefield*, 132 Wn. App. 878, 134 P.3d 1203 (2006), *review denied*, 2007 Wash. LEXIS 195 (Wash., March 7, 2007) (citing, RCW 9A.28.020(1)).

In *State v. Varnell*, the Washington Supreme Court analyzed the unit of prosecution question for the criminal solicitation statute, RCW 9A.28.030(1). 162 Wn.2d 165, 167, 170 P.3d 24 (2007). The question that arose in *Varnell*, was whether a solicitation in a single conversation to murder four people constitutes a single unit of prosecution of solicitation to commit murder. 162 Wn.2d at 168. The court held that only one count of solicitation could stand. 162 Wn.2d 171. In arriving at this conclusion the court analyzed the legislative intent, as well as the particular facts of the case. As to the legislature intent, the court noted that the “language of the solicitation statute focuses on a person’s ‘intent to promote or facilitate’ a crime rather than the crime to be committed. The evil the legislature has criminalized is the act of solicitation.” 162 Wn.2d at 169. The court noted that the number of victims is secondary to the statutory aim, “which centers on the agreement on solicitation on a criminal act.” The court further analyzed that the “solicitation has occurred regardless of the completion of the criminal act.” *Id.*

The court next turned to a factual analysis. The factual determinations required the court to look to “whether the facts in this case may reveal more than one unit of prosecution because . . . multiple conspiracies may be charged where the facts of the case support multiple criminal agreements.” *Id.* at 171. Following their analysis in *State*

v. Bobi,⁵ the court looked to “whether the time, persons, places, offenses, and overt acts were distinct.” *Id.* The court found that in *Varnell*, the solicitation was one conversation with a single detective, at the same time and place and for the same motive. *Id.*

Turning to the case at bar, the argument can be made under *Varnell* that witness tampering, like solicitation/conspiracy, is an inchoate crime, and penalizes the act of trying to induce a person to testify falsely, regardless of whether the persons completes the act. However, there is a greater evil than just the attempt to create false testimony, and that is the mental coercion involved in witness tampering. It is this evil that the legislature also intended to proscribe in enacting this statute. Unlike conspiracy or solicitation, there is a target victim in the crime of witness tampering – the witness. The legislature documented its intent in the drafting of the “bribing a witness” statute under RCW 9A.72.090, “intimidating a witness,” under RCW 9A.72.110, and “tampering with a witness,” under RCW 9A.72.120, in the findings following RCW 9A.72.090:⁶

The legislature finds that witness intimidation and witness tampering serve to thwart both the effective prosecution of criminal conduct in the state of Washington and resolution of child dependencies.

⁵ 140 Wn.2d 250, 263-66, 996 P.2d 610 (2000) (holding that the unit of prosecution in a conspiracy case is the conspiratorial agreement and not the specific criminal acts).

⁶ Following RCW 9A.72.120, under “Finding -1994 -”, it provides, “See note following RCW 9A.72.090.”

Further, the legislature finds that intimidating persons who have information pertaining to a future proceeding serves to prevent both the bringing of a charge and prosecution of such future proceeding. The legislature finds that the period before a crime or child abuse or neglect is reported is when a victim is most vulnerable to influence, both from the defendant or from people acting on behalf of the defendant and a time when the defendant is most able to threaten, bribe, and/or persuade potential witnesses to leave the jurisdiction or withhold information from law enforcement agencies.

The legislature moreover finds that a criminal defendant's admonishment or demand to a witness to "drop the charges" is intimidating to witnesses or other persons with information relevant to a criminal proceeding.

The legislature finds, therefore, that tampering with and/or intimidating witnesses or other persons with information relevant to a present or future criminal or child dependency proceeding are grave offenses which adversely impact the state's ability to promote public safety and prosecute criminal behavior.

LAWS OF 1994, ch. 271, sec. 201.

This history outlines that the legislature was concerned that victims are vulnerable to influence, intimidation, and coercion, and supports a finding that the legislative intent was to treat each attempt as a single unit of prosecution. The influence/coercion involved in witness tampering becomes magnified with each contact, and each separate attempt to influence a witness.

Aside from the legislative history of the tampering statute, the facts of this case also call for separate units of prosecution for each contact. Here, the defendant contacted the victim 36 times. Pl. Ex. 6 (Appendix

A), CP 52. Out of the 36 calls, the State only charged eight counts of witness tampering. CP 1-6. These eight counts reflect the separation of time in the contacts as well as the increasing coercion, and the evolving story which defendant attempted to pitch to the victim. Unlike *Varnell, supra*, the crime did not occur at the same time and place, and the subject of the conversations was different.

The separate counts pull-together the different facts/circumstances of the contacts as follows:

	Date	Times	Subject
COUNT I	1/6/07	20:22 20:44	<ul style="list-style-type: none"> • Initial contact • She needs to say he acted in self-defense
COUNT II	1/6/07	21:38 22:01	Adds the Jay and Maria knife story
COUNT III	1/7/07	9:41 10:02 11:53 12:52 13:44	<ul style="list-style-type: none"> • My cousin Kevin did it • Motive for lying
COUNT IV	1/7/07	18:58 19:30 20:01 20:43 21:06 21:26	Adds additional pressure, including the amount of time he is looking at and reassures her that she is not going to jail for filing a false report. Tells her she needs to take the letter to his lawyer
COUNT V	1/8/07	12:07 12:13 12:48	Tells her to address the letter to his attorney and says she must do this so he does not die.
COUNT VI	1/8/07	17:45 18:24 19:38	Very extensive detail about the concocted story. Adds details of her taking a shower after the rape. Tells her when to cry.

COUNT VII	1/9/07	8:12	Adds that the reason Kevin raped and beat her was because he wanted money
COUNT VIII	1/9/07	8:54	The reason she got the protection order was because her family wanted her to

Exhibit 7, *See* Facts in Statement of Case, *supra*.

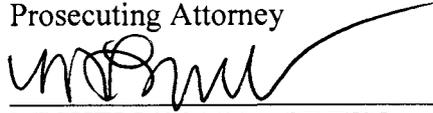
The defendant spent days, and over 36 phone calls, in an attempt to influence Victoria's testimony. While the State agrees that each telephone call in this case may not support a separate tampering charge, the State was within the parameters of what the legislature intended to proscribe when it filed charges that held defendant accountable for the evolving story and increasing pressure which he placed on this victim. This was not a single act of tampering, but independent acts that constitute separate, punishable crimes. The legislative history, as well as the facts of this crime, supports the eight counts of witness tampering in this case.

D. CONCLUSION.

The State requests that this court affirm all eight counts of witness tampering in this case where both legally and factually the crimes constitute more than one unit of prosecution.

DATED: September 30, 2008.

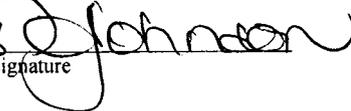
GERALD A. HORNE
Pierce County
Prosecuting Attorney

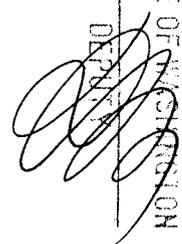


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Certificate of Service:

The undersigned certifies that on this day she delivered by U.S. mail or ABC-LMI delivery to the attorney of record for the appellant and appellant c/o his attorney true and correct copies of the document to which this certificate is attached. This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Tacoma, Washington, on the date below.

9/30/08 
Date Signature

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APPENDIX A

Plaintiff's Ex. 2-A



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◀	1400092	LINE #92, NO PIN	01/07/2007 21:06:26	20	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/07/2007 21:26:53	20	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/08/2007 12:07:29	4	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/08/2007 12:13:00	11	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/08/2007 12:25:04	3	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/08/2007 12:48:08	15	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 16:31:37	0	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 16:32:26	0	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 16:33:12	0	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 16:41:53	0	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 16:54:28	0	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/08/2007 17:07:14	0	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 17:45:03	0	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 17:45:41	20	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 18:24:15	20	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/08/2007 19:38:35	20	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/08/2007 19:58:24	20	253 - 503 - 1648
◀	1400092	LINE #92, NO PIN	01/08/2007 20:47:41	20	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/08/2007 21:46:43	20	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/09/2007 08:12:09	20	253 - 503 - 1648
◀	1400053	LINE #53, NO PIN	01/09/2007 08:54:04	20	253 - 503 - 1648