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STATE OF WASHINGTON
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No. 40914-3-II

IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON,
Respondent,

v.

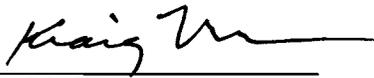
JOSEPH DEAN HUDSON SR.,
Appellant.

APPEAL FROM THE SUPERIOR COURT OF THE STATE
OF WASHINGTON FOR GRAYS HARBOR COUNTY

THE HONORABLE F. MARK McCAULEY, JUDGE

BRIEF OF RESPONDENT

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STATEMENT OF THE CASE

On April 5, 2009, at approximately 1:00 am, Kenneth Grover was awakened from his bed to the sound of an collision outside of his mobile home. (RP 62). He believed the car was going through his house. He went to his window and yelled out, “is anybody hurt?” (RP 63). A person yelled back from the wrecked vehicle stating, “no.” Mr. Grover described the voice as being calm.

Grover exited his home and went to the scene of the collision. As he approached the vehicle, he saw a man attempting to crawl out of the back passenger driver’s side window. (RP 64). He described the man as being frantic. (RP 67). He also found a female on the outside of the vehicle who appeared unconscious to him. In the distance he saw a man gasping for breath that he identified as Tommy Underwood, the decedent. *Id.* He was laying down with his chest to the ground and his head in the position that would indicate that his neck was broken. *Id.*

Later, Grover witnessed the appellant return to the scene of the crime. (RP 70). As a result of the collision, Tommy Underwood died. The female, later identified as Paula Charles, suffered fractures to her face, and the man crawling out of the window, Leon Butler, was taken to the

hospital with an injury to his leg. The appellant was not on scene when police arrived.

Trooper Ben Blankenship of the Washington State Patrol was the first officer to have contact with the appellant. He arrived on scene after an emergency crew had already begun working and was assessed of the situation. He was informed that there was four possible occupants of the vehicle, but one was not located. (RP 173). The trooper searched for ten minutes around the surrounding area and could not find that person. *Id.*

Approximately an hour and half after the trooper arrived on scene, the appellant, Joseph Hudson Sr., returned. (RP 174). The officer made contact with the appellant and took him aside to question him. (RP 175). The officer described him as having grass debris in his hair and being extremely intoxicated. *Id.*

In order to separate the appellant from family members of the deceased, the trooper walked him back to his patrol car and secured him in the backseat. (RP 176). Shortly after that, the trooper received instructions from his sergeant to arrest Mr. Hudson for Vehicular Homicide.

Trooper Blankenship read the defendant his constitutional rights as required by *Miranda v. Arizona*, 384 U.S. 436, 86 S.Ct. 1602, 16 L.Ed.2d 694 (1966), and the defendant stated that he understood and answered questions. (RP 01-08-2010, at 17).

During the first interview the appellant denied any memory of the event. He stated that he had been down the road near the beach access. (RP 177). He also expressed confusion as to seating of the individuals in the vehicle prior to the accident. (RP 178).

Later, Detective Dan Presba of the Washington State Patrol questioned the appellant as well. Prior to questioning, the detective asked the appellant if he remembered the trooper reading him his constitutional rights and if he understood those rights. (RP 200). The appellant acknowledged that he did remember and did understand his rights. *Id.* During this conversation the appellant admitted to being the driver. He also informed the detective that he was traveling too fast. (RP 201).

Trooper Blankenship took the appellant to the Ocean Shores Fire Department for a legal blood draw. (RP 178). The blood was sent to the Washington State Patrol Crime Laboratory and tested for blood alcohol. Lisa Noble of the crime laboratory testified that the result was .19 grams per 100 milliliters of blood. (RP 277).

At trial, Detective Dan Presba testified as an collision reconstruction expert. He explained that prior to the collision the vehicle in question was traveling over 75 miles per hour in a 30 mile per hour speed zone. (RP 214). The driver locked up the brakes of a s-turn and went off the road.

The vehicle rolled over twice and came to rest on it wheels. (RP 216). Two of the occupants were thrown from the vehicle. (RP 217).

From the dynamics of the collision the detective was able to determine that Paula Charles was in the front passenger seat (RP 218), and that Tommy Underwood and Leon butler were in the rear seat. (RP 219). Leaving the appellant as the driver.

Fresh blood was found on the front driver's side door and the front driver's side kick plate of the vehicle. This blood was matched, by DNA analysis, to the appellant. (RP 316).

ARGUMENT

1. THE TRIAL COURT PROPERLY ADMITTED THE APPELLANT'S CUSTODIAL STATEMENTS REGARDING HIS RESPONSIBILITY FOR THE DEATH OF TOMMY UNDERWOOD.

The appellant first claims error in the admission of his statements to law enforcement. These statements were made after he was properly advised of his rights regarding such interrogation and his acknowledgment that he understood these rights. Further, the trial court found that he voluntarily made these statements.

The legal standard for implied waiver of a defendant's right to remain silent was articulated in *State v. Terrovona*, 105 Wash.2d 632, 716 P.2d 295 (1986). The Court held that a waiver of rights before police questioning need not be express. *Id.* at 646. A implied waiver can be found when a court finds that the defendant understood his rights and volunteered information after reaching this understanding. *Id.*

A court finding of implied waiver is a finding of fact. Findings of fact entered following CrR 3.5 hearing are verities on appeal if unchallenged, and, if challenged, they are verities if supported by substantial evidence in the record. *State v. Broadaway*, 133 Wn.2d 118, 131, 942 P.2d 363 (1997). A contested finding of fact made as a result of a suppression hearing will not be disturbed if the finding is based on substantial evidence. *State v. Vickers*, 148 Wn.2d 91, 112, 59 P.3d 58 (2002). The party challenging the finding bears the burden of proving that the court did not rely on such evidence. *Id.* Substantial evidence is “evidence sufficient to persuade a fair-minded, rational person of the truth of the finding.” *Id.*

Credibility determinations are for the trier of fact and are not subject to review. *State v. Camarillo*, 115 Wn.2d 60, 71, 794 P.2d 850 (1990). A reviewing court must defer to the trier of fact on issues of conflicting testimony, credibility of witnesses, and the persuasiveness of the evidence. *State v. Cord*, 103 Wn.2d 361, 367, 693 P.2d 81 (1985).

James R Terrovona appeal his conviction for First Degree Murder claiming, among other errors, that the lower court should not have allowed his out-of court statements to be admitted at trial. *Id.* at 646. Terrovona was identified as a suspect in the shooting death of Gene Patton. During there investigation, Snohomish County Deputies contacted Terrovona at his home. *Id.* at 635. The deputies had no arrest warrant. *Id.* After the suspect opened the door, he was arrested and handcuffed by the

deputies. *Id.* The deputies read Terrovona his *Miranda* warnings, and he indicated that he understood them. *Id.* After, the suspect went on to make incriminating statements. *Id.*

The Supreme Court upheld the lower court's finding that Terrovona impliedly waived his rights. *Id.* at 647. In making this holding the Court stressed that the defendant was not coerced into making any of the statements. *Id.*

A suspect in a criminal case can waive his right to remain silent if such waiver is made knowingly, voluntarily and intelligently. *Id.* at 646. A valid waiver may be express but does not have to be. *Id.* A waiver can be inferred from the facts of a custodial interrogation. *Id.* A waiver can be found where the record indicates that the defendant understood his rights and volunteered information. *Id.* A waiver can be inferred if the record shows that the defendant's answers were freely and voluntarily made without duress, promise or threat and with full understanding of his constitutional rights. *Id.* At 647. Stressing a lack of any coercion on the part of the police the Court held that Terrovona waived his right to remain silent. *Id.*

Written findings were entered in this case, specifically stating that the appellant was read *Miranda* warnings, he understood this warnings and that he voluntarily answered questions. This is all that is required for the admissions of his statements.

Inherent in the trial courts finding that the appellant's statement were voluntary is the finding that the circumstances of the statement did not influence the voluntary nature of these statements. The appellant asserts that the court is required to make specific findings that the defendant's intoxication did not effect the voluntary nature of his statements. But, the appellant cites no authority to support this theory. The circumstance of the police conduct is only important with regard to the voluntary nature of the appellant's confession, and the trial court made a finding, in this case, that the appellant confession was voluntary.

Once substantial evidence is introduced to support this finding it is the appellant's burden to prove that the trial court abused it discretion in admitting his statements. The appellant offer no evidence to support the fact the trial court abused its discretion in admitting the appellant's statement.

2. LAW ENFORCEMENT HAD PROBABLE CAUSE TO ARREST THE APPELLANT.

As a general rule a appellant may not raise an issue for the first time during an appeal. RAP 2.5(a). In order to preserve an issue, regarding evidence admitted at trial, for appeal the appellant must make a timely motion to suppress. *State v. Slighte*, 157 Wash.App. 618, 623, 238 P.3d 83, 85 (2010). A criminal defendant may raise an issue for the first time during appeal if that issue is manifest error affecting a constitutional right. *Id.* The Washington State Supreme Court has stated that the

exception to the general rule that issues cannot be raised for the first time on appeal “is not intended to afford criminal defendants a means for obtaining new trials whenever they can identify some constitutional issue not raised before the trial court.” *State v. McFarland*, 127 Wash.2d 322, 333, 899 P.2d 1251, 1256 (1995). The issue must be “truly of a constitutional magnitude.” *Id.* Moreover, if the facts “necessary to adjudicate the claimed error are not in the record on appeal, no actual prejudice is shown and the error is not manifest.” *Id.*

To begin, law enforcement had, particularized, reason to believe that the appellant was in fact guilty of this crime. Evidence of flight of person, following commission of crime, is admissible and may be considered by jury as a circumstance, along with other circumstances of case, in determining guilt or innocence. *State v. Bruton*, 66 Wash.2d 111, 401 P.2d 340, (1965).

In this case law enforcement was presented with a major auto collision that resulted in serious injury to at least two occupants of the vehicle. Prior to the arrest of the appellant, the officers, investigating this case, knew that one of the occupants had left the scene. When he returned to the site of the collision, hours later, he was intoxicated and did not have any explanation for his flight. The fact that he left is admissible evidence that he was in fact culpable for the injuries that he caused.

The standard of evidence required for a finding of probable is substantially lower for that of guilty in a criminal prosecution. A

determination of “probable cause is made on the officer's knowledge at the time of the arrest. Because the facts supporting probable cause are often founded on hearsay and hastily garnered knowledge, it is sufficient if the information is reasonably trustworthy; it need not be absolutely accurate.” *State v. Gaddy*, 114 Wash.App. 702, 706, 60 P.3d 116, 119 (2002).

The standard for probable cause to arrest has been defined and should not be confused with the higher standard for conviction that the State must prove each element of the crime beyond a reasonable doubt. *State v. Knighten*, 109 Wash.2d 896, 902, 748 P.2d 1118, 1122 (1988). The arresting officer needed only to have facts and circumstances within his knowledge sufficient to cause a reasonable person to believe that an offense had been committed. *Id.* The fact that the appellant is the only occupant of the vehicle to leave the scene of this collision, and that he was, in fact, intoxicated is sufficient evidence for his arrest for, further investigation, of he crime of vehicular assault.

If this Court finding that probable cause did not exist at the time of arrest, then the defendant did not preserve this issue for appeal. This is an issue of suppression of evidence. The Supreme Court of the State of Washington has held that a failure to bring a motion to suppress evidence, even evidence obtained in violation of the constitution, is a waiver of objection as to its admissibility on appeal. *State v. Mierz*, 127 Wash.2d 460, 468, 901 P.2d 286, 290 (1995).

In *State v. Mierz*, the evidence in question was obtained by entering the defendant's property without a search warrant. Despite the obvious constitutional violation the Court ruled that the defendant could not make an argument for reversal on appeal when he did not make a motion to suppress prior to trial. It is clear from this holding that the admission of evidence, even evidence obtained in violation of the warrant requirement is not truly of a constitutional magnitude.

3. ADMISSION OF THE TAPES CONVERSATION OF THE APPELLANT WAS PROPER.

The appellant claims that a taped jail telephone conversation was admitted in violation of state statute. RCW 9.73.030 prohibits the interception of private conversation. The Supreme Court has held that a person that engages in a telephone conversation from a correctional institution cannot claim a privacy interest in the conversation, therefore the conversation is not private for the purposes of RCW 9.73.030. *State v. Modicums*, 164 Wash.2d 83, 186 P.3d 1062 (2008). This holding was predicated on the understanding that the fact that the call was recorded was announced at the beginning of the telephone call. *Id.*

The tapes conversation in this case included announcement at the beginning of the call that the conversation was subject to recording. For this reason, the recording was not made in violation of RCW 9.73.030, and should be admissible.

It is clear that the appellant was aware that the conversation was being recorded, but the phone was passed from one person to another on the receiving end. The appellant claims that it is unclear whether this person knew that the conversation was being recorded, and if not then the recording was in violation of her rights. The appellant attempts to assert her right of privacy to argue that this evidence should have been suppressed at trial. The second party to this phone call testified, at trial, as to the authenticity of the call and did not object to its admission.

This call was admitted in to evidence without objection from the appellant on the grounds that the recording was made in violation RCW 9.73.030. The record contains insufficient evidence to establish compliance with state statute regarding recorded conversations. Only on appeal does the appellant claim error. Because of his late objection to this evidence the record does not contain facts that would support his contention that the conversation was recorded in violation of RCW 9.73.030. If the facts “necessary to adjudicate the claimed error are not in the record on appeal, no actual prejudice is shown and the error is not manifest.” *State v. McFarland*, 127 Wash.2d 322, 333, 899 P.2d 1251, 1256 (1995).

This court does not have the information as to whether the receiving party was informed that the call was being recorded. It is simply not in the record. The person who answered the call could have informed the second party that the call was being recorded and then no violation of the Privacy Act could be claimed. But, the appellant did not make a

timely objection so that the issue could be resolved. This person was at trial and the appellant could have questioned her prior to the admission of the recording, but he did not. For this reason, no actual prejudice can be claimed on part of the appellant. Therefore, the defendant is precluded from raising this issue on appeal.

4. THE APPELLANT'S BLOOD ANALYSIS RESULT WERE PROPERLY ADMITTED.

The appellant objects to the admission of his blood analysis at trial because the State failed to prove that the vials used were a chemically clean dry containers, with a inert leak proof stoppers. The appellant did not object to this evidence trial. (RP 277). Substantial testimony was offer to establish the foundation of the blood analysis, and it was admitted without objection on the part of the appellant.

As stated before, in order to raise an issue for the first time on appeal the appellant must show manifest constitutional error. At a minimum the appellant must demonstrate that he would have be granted his motion by the trial court if made. *State v. McFarland*, 127 Wash.2d 322, 899 P.2d 1251 (1995) (footnote 2).

The appellant offers nothing to indicate that the collection of his blood sample was, in fact, improper. It is the appellant's burden to establish that if he made an objection to the admission to this evidence the trial court would have granted his motion. Without this showing on the

part of the appellant this court should not review this issue for the first time on appeal and without a complete record.

5. THE APPELLANT HAD THE BENEFIT OF EFFECTIVE COUNSEL.

The Washington State Supreme Court adopted a two prong test for analysis of the effectiveness of a defense counsel performance.

Strickland v. Washington, 466 U.S. 668, 687, 80 L. Ed. 2d 674, 104 S. Ct. 2052 (1984). The Court stated that “[t]he purpose of the requirement of effective assistance of counsel is to ensure a fair and impartial trial.” *State v. Thomas*, 109 Wn.2d 222, 225; 743 P.2d 816 (1987). In order to maintain a claim of ineffective assistance of counsel, the defendant must show not only that his attorney’s performance fell below an acceptable standard, but also that his attorney’s failure affected the outcome of the trial.

Strickland v. Washington explains that the defendant must first show that his counsel’s performance was deficient. 466 U.S. 668, 687, 80 L. Ed. 2d 674, 104 S. Ct. 2052 (1984). Counsel’s errors must have been so serious that counsel was not functioning as the “counsel” guaranteed the defendant by the Sixth Amendment. *Id.* The scrutiny of counsel’s performance is guided by a presumption of effectiveness. *Id.* at 689. Secondly, the defendant must show that the deficient performance prejudiced the defense. *Id.* at 687. The defendant must show “that counsel’s errors were so serious as to deprive the defendant of a fair trial, a

trial whose result is reliable.” *Id.* For prejudice to be claimed there must be a showing that “there is a reasonable probability that, but for counsel’s unprofessional errors, the result of the proceeding would have been different.” *Id.* at 694. A reasonable probability is a probability sufficient to undermine confidence in the outcome. *Id.*

If both prongs of the test are not met than the defendant cannot claim the error resulted in a breakdown in the adversary process that renders the result unreliable. *Id.* at 687.

It has been stated that “[t]he decision of when or whether to object is a classic example of trial tactics.” *State v. Madison*, 53 Wn. App. 754, 763; 770 P.2d 662 (1989). But, only the in the most egregious circumstances when the testimony is central to the State’s case, will the failure to object to testimony justifying reversal. *Id.*

The appellant claims that his counsel was ineffective for failure to object to inadmissible evidence. In the claimed errors above, the appellant has failed to prove that a timely objection would have yielded a different result. These errors have all been based on failings in the record. The lack of record as to these claimed errors are the result of counsels failure to object, but there is nothing in the record to indicated that a timely objection would have been to the benefit of the appellant. It is merely speculations on his part that different action by his counsel would have resulted in an acquittal.

The appellant must show to maintain a claim of ineffective counsel that but for his counsel's mistakes the outcome would have been different.

6. SUFFICIENT EVIDENCE SUPPORTED THE JURY FINDING THAT THE DEFENDANT DEMONSTRATED AN EGREGIOUS LACK OF REMORSE IN THE WAKE OF THE COMMISSION OF HIS CRIME.

Due process requires that the State bear the burden of proving each and every element of the crime beyond a reasonable doubt. *State v. McCollum*, 98 Wn.2d 484, 488, 656 P.2d 1064 (1983). The applicable standard of review is whether, after reviewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt. *State v. Joy*, 121 Wn.2d 333, 338, 851 P.2d 654 (1993). Also, a challenge to the sufficiency of the evidence admits the truth of the State's evidence and any reasonable inferences from it. *State v. Barrington*, 52 Wn.App. 478, 484, 761 P.2d 632 (1987) rev. den., 11 Wn.2d 1033 (1988). All reasonable inferences from the evidence must be drawn in favor of the State and interpreted more strongly against the defendant. *State v. Salinas*, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992). In considering this evidence, "credibility determinations are for the trier of fact and cannot be reviewed on appeal." *State v. Carmillo*, 115 Wn.2d 60, 71, 794 P.2d 850 (1990).

The defendant made an effort, in the aftermath of causing this serious collision, to discourage a person from calling for help. When

asked if anybody was injured he responded “no” and left the scene. This action is simply egregious. At the time that he made the statement that no one was hurt Tommy Underwood was still alive. If he had any chance to live it would have been with the help of emergency personal.

It cannot be argued that someone else made this state, no other person was in a condition to respond calmly, nor can he claim that he was mistaken. Two of he friend were ejected from the vehicle. How could anybody believe that they were not injured. In this act the defendant demonstrated a reprehensible lack of remorse for the injuries he caused.

The defendant testified that he simply wandered unaware from the scene of the collision. The jury did not believe him. The State is not under any burden to disprove the appellant explanation for this action. It is the jury province to weigh the credibility of the witnesses’ statements, and the jury clearly found the appellant explanation un satisfying.

CONCLUSION

For the reason stated above the State asks this Court to deny the appellant’s claims of error and affirm his conviction.

Respectfully Submitted,

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STATE OF WASH.
BY _____
DEPUTY

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON,

Respondent,

No.: 40914-3-II

v.

DECLARATION OF MAILING

JOSEPH DEAN HUDSON SR.,

Appellant.

DECLARATION

I, Barbara Chapman hereby declare as follows:

On the 27th day of June, 2011, I mailed a copy of the Brief of Respondent to:

Jodi R. Backlund
Backlund & Mistry
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Olympia, WA 98507-6490

by depositing the same in the United States Mail, postage prepaid.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 27th day of June, 2011, at Montesano, Washington.

Barbara Chapman