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NO. 56460-9-I

COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION I

STATE OF WASHINGTON,

Respondent,

v.

ALI MOHAMMED ELMI,

Appellant.

APPEAL FROM THE SUPERIOR COURT FOR KING COUNTY

THE HONORABLE RICHARD McDERMOTT

BRIEF OF RESPONDENT

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A. ISSUES

1. Challenges to the sufficiency of the evidence must be viewed in the light most favorable to the State. Here, the defendant was angry at his wife, who had obtained a restraining order against him. The defendant armed himself, went to a residence where he believed his wife was staying, saw her in the window, and decided to fire at least four shots at her from close range. Most of the bullets went through the window and fortunately missed the victim. Could a reasonable jury infer from the evidence that the defendant took a substantial step toward killing his wife and that his decision to kill was premeditated?

2. Assault in the first degree with a firearm requires a specific intent to inflict great bodily harm. This intent may be transferred when an unintended victim is hit and a battery is committed. However, when the unintended victims are not injured, the defendant must have been aware of the presence of other individuals and tried either to injure them or to cause them fear and apprehension. Here, the defendant fired multiple shots at his wife, trying to kill her. However, there was no evidence that he knew that three young children were also present in the same room as his wife. Under these circumstances, when the children were not injured, was

there sufficient evidence that the defendant intentionally assaulted the children with a firearm? Must the assault in the first degree counts relating to the children be dismissed?

B. STATEMENT OF THE CASE

1. PROCEDURAL FACTS

Ali Elmi was charged in King County Superior Court with Attempted Murder in the First Degree, Count I, and Assault in the First Degree, Count II, for shooting at Fadumo Aden on May 18, 2002. Elmi was charged in Counts III-V with first degree assault against three young children, Kamal Nur, Asha Abdula, and Ahmed Abdula, who were inside the same residence at the time of the shooting. Elmi was also charged in Count VI with Domestic Violence Misdemeanor Violation of a Court Order. CP 142-45.

After being found guilty of all counts by a jury, King County Superior Court Judge Jay White granted Elmi's motion for a new trial based upon a claim of two newly-discovered defense witnesses. Elmi was again tried by jury, this time before Judge Richard McDermott. The jury again found him guilty of all counts, with special allegations that he was armed with a firearm on each of the five felony counts. CP 146-56. On June 24, 2005, Judge McDermott, as

required by law, imposed standard range consecutive sentences on the attempted murder count involving Fadumo Aden, and the three counts of first degree assault involving the children. The court found that the assault in the first degree count involving Fadumo Aden merged with the attempted murder conviction; thus, sentence was not imposed on Count II, although that count was not vacated. CP 221-30. The court imposed a suspended sentence on Count VI, the Domestic Violence Misdemeanor Violation of a Court Order. CP 231-33. Elmi timely appealed. CP 219-20.

2. SUBSTANTIVE FACTS

Fadumo Aden married Ali Mohammed Elmi in 1998, and they had a son named Kamal Nur, born in February, 1999. 16RP 33-36.¹ Ms. Aden separated from Elmi, and obtained a no contact order on March 7, 2002. 16RP 38-39. The order allowed Elmi to visit Kamal, but he was not to contact Fadumo Aden, except during visitation.

¹ There are 23 volumes of the verbatim report of proceedings, as follows: Volume 1 - February 28, 2003; Volume 2 - March 10, 2003; Volume 3 - March 11, 2003; Volume 4 - March 17, 2003; Volume 5 - March 18, 2003; Volume 6 - March 19, 2003; Volume 7 - March 20, 2003; Volume 8 - March 24, 2003; Volume 9 - March 25, 2003; Volume 10 - March 26, 2003; Volume 11 - March 27, 2003; Volume 12 - March 31, 2003; Volume 13 - March 24, 2004; Volume 14 - April 7, 2005; Volume 15 - April 12, 2005; Volume 16 - April 14, 2005; Volume 17 - April 25, 2005; Volume 18 - April 26, 2005; Volume 19 - April 27, 2005; Volume 20 - April 28, 2005; Volume 21 - May 2, 2005; Volume 22 - May 3, 2005; Volume 23 - June 24, 2005.

16RP 39-41, 46. Following the separation, Fadumo Aden lived at her mother's house on 32nd Avenue South in Seatac. 16RP 43.

Fadumo Aden had a Volkswagen Jetta in her name, even though Elmi had possession and used the car. 16RP 42. When the tabs expired and Elmi could not renew them, he wanted Ms. Aden to renew them. 16RP 42-45.

On May 18, 2002, Fadumo Aden was at Southcenter Mall with Kamal and a female friend. 16RP 47. Elmi called the cell phone of the friend, who handed the phone to Aden. 16RP 48. Elmi was angry because she had not renewed the tabs and, during a heated argument, proceeded to call her foul names. 16RP 49-50. After the call, Aden returned to her mother's house in Seatac. 16RP 51.

That evening, Fadumo Aden was at her mother's house. She was alone with three children: her three-year-old son Kamal, five-year-old Asha Abdula, and Asha's three-year-old brother, Ahmed Abdula. 16RP 52-57. At about 10:00 p.m., she was watching cartoons with the children on the television in the living room. 16RP 52-57.

Fadumo Aden heard people arguing outside and looked out the front picture window. She claimed that she could not see any of the faces of the people she saw. 16RP 58-59. She returned to

watching TV and then heard gunshots and glass breaking from her front window. 16RP 60; 17RP 22. She screamed and moved the children to another room. 16RP 60. She saw that the TV was broken. 16RP 60.

At trial, she testified she never saw the person who fired through the window. 16RP 61. However, Ms. Aden called 911 right after the shooting, clearly excited, and immediately told the operator that her ex-husband was there shooting at her. 16RP 62. 911 tape, State's Exh. 6; 16RP 62-73. At the end of the tape she said she was not sure who shot at her. 17RP 23.

On May 21, 2002, Fadumo Aden gave a formal statement to Detective Geary Murray of the Kent Police Department in which she identified Elmi as the shooter. 16RP 68-69.

On May 29, 2002, she gave a statement to Detective Jesse Anderson of the King County Sheriff's Office, and again identified Ali Elmi as the shooter. She told Detective Anderson that she could see Elmi standing outside and then walk up the driveway. 16RP 70. She said someone was trying to hold Elmi back, to no avail. 17RP 52-53. She also told Detective Anderson that she saw Elmi point the gun at her house. 16RP 70-71. In her statement to Detective Anderson, she said she was positive with regard to her identification of Elmi.

16RP 71; 17RP 45, 51-52. She also told Detective Anderson that Elmi had threatened to kill her during the phone conversation earlier in the day. 17RP 31. Judge McDermott instructed the jury that Fadumo Aden's statements to Detectives Murray and Anderson were only to be considered in assessing Aden's credibility. 17RP 61-63.

Investigating police detectives noted several bullet holes in the front window of the residence. 17RP 135. There were three holes in the front window and damage below the window to the structure of the house. 17RP 135-36. At least four rounds in total struck the house. 17RP 136. Bullet holes were found in the curtains, the TV stereo cabinet, and a kitchen cabinet. 17RP 139-42. The bullets had gone through the living room and into the kitchen. 17RP 142. Four shell casings were found outside the house, all within five to ten feet of the front window. 17RP 143-45. Three slugs were recovered, one under the front window below the sill, one inside the living room below the curtains, and one behind the TV in the wall. 17RP 146-47.

Ali Elmi fled the state after the shooting. On June 20, 2002, Elmi left a message on Fadumo Aden's answering machine telling his son Kamal that he loved and missed him and would be home in the future. 16RP 71-72; 18RP 52.

Police developed information that a car connected to the shooting was a black 1995 Honda Civic. Fadumo Aden had described the car she had observed outside her residence as a Honda Civic. 17RP 40-41. Detective Anderson was able to connect the Honda to an individual named Mohammed Karie. 18RP 65. Karie was contacted and allowed the police to examine the car on June 5, 2002. The police recovered a Sprint cell phone bill in the name of Ali Elmi in the car. 18RP 52.

On July 4, 2002, Fairfield County, Ohio police deputies responded to a disturbance call. 17RP 73. A gun had been involved in the disturbance incident. A Toyota Camry was impounded during the investigation of that incident, and a semiautomatic Megastar 10mm handgun was recovered under the back seat. 17RP 79. The serial number had been removed. 17RP 80-81. Among those detained in the disturbance incident was Kalif Diriye. 17RP 81.

Four months later, on October 8, 2002, in nearby Franklin County, Ohio, Elmi was arrested driving the Toyota Camry that the gun had been found in during the July 4 incident. 17RP 67. Elmi had pulled into a lot and run inside a store, where the police arrested him. 17RP 69-70.

Comparison of the shell casings found outside Fadumo Aden's residence with the 10mm Megastar handgun recovered in Ohio established that it was the gun used in the Fadumo Aden shooting. 18RP 132.

During Elmi's first trial in March, 2003, before King County Superior Court Judge Jay White, Elmi wrote a letter to a friend that was intercepted by a King County Jail corrections officer. 18RP 137-38. In the letter, Elmi asked the friend to contact Fadumo Aden and ask her to lie for him. 18RP 139-42. Elmi wrote that the prosecutor was winning the case, and Elmi wanted Fadumo Aden to say that she knew who Kalif Diriye was and that she had had contact with Diriye shortly before the shooting. 18RP 139-40. This was an attempt by Elmi to claim that it must have been Diriye, the individual arrested when the gun was found, who had done the shooting. Elmi also implored his friend to tell Fadumo Aden to say that he was in Alaska at the time of the shooting. 18RP 139-41. At the end of his letter, he told the friend to tell Fadumo Aden that she "has to do this for me, otherwise they are going to take me away forever." 18RP 139-41. The King County Jail corrections officer intercepted Elmi's letter when he tried to pass it to another inmate. 18RP 137-38. Elmi

began to cry when the officer took the letter away from him.

18RP 142.

At trial, Elmi presented an alibi defense through witness Saynab Ali. Elmi is Saynab Ali's brother-in-law. 19RP 35-36.

Saynab Ali testified that Elmi was with her all night at her home.

19RP 39-40. It was not until March, 2003, that Saynab Ali told authorities that Elmi had been with her on the night of the shooting.

19RP 48-49.

The defense also called Mohammed Karie, who claimed that he had loaned his black Honda Civic to someone named "Abdul" on the day of the shooting. 20RP 9-10, 24. Karie also claimed to be an eyewitness to the shooting, fleeing the scene in another car after the shots were fired. 20RP 11-12. He testified that shortly after the shooting, Ali Elmi borrowed his Honda Civic and drove it for a few days. 20RP 16-18. Karie testified that he did not tell the police that "Abdul" had done the shooting because he was scared. 20RP 23-24. Nor did he tell Detective Anderson that Ali Elmi had not been at the scene during the shooting. 20RP 38. He admitted making things up to the police. 20RP 41. It was not until March, 2003, during the first

trial, that he told anybody that the police had the wrong person.

20RP 44.

Ali Elmi did not testify at trial.

C. ARGUMENT

1. THERE WAS SUFFICIENT EVIDENCE TO PROVE
PREMEDITATION.

Elmi argues that his conviction for attempted first degree murder should be reversed and dismissed because there was insufficient evidence to prove premeditation. However, when the evidence is viewed in the light most favorable to the State, a rational jury could infer that Elmi intended to kill Fadumo Aden and that his intent to kill was premeditated. Elmi armed himself with a handgun after an angry dispute with Fadumo Aden earlier in the day, broke free of people trying to restrain him prior to the shooting, fired point blank several times into the area where Fadumo Aden had been standing in the picture window, and it was only fortuitous that she was not struck by one or more of the bullets. A jury could rationally conclude that Elmi had sufficient time to reflect and that he did indeed intend to kill Fadumo Aden.

Evidence is sufficient if, viewed in the light most favorable to the State, a rational trier of fact could find the elements of the crime beyond a reasonable doubt. State v. Green, 94 Wn.2d 216, 616 P.2d 628 (1980). Premeditation is the mental process of thinking beforehand, deliberation, reflection, waiting or reasoning for a period of time, however short. State v. Gentry, 125 Wn.2d 570, 597-98, 88 P.2d 1105 (1995). Premeditation may be proved by circumstantial evidence where the inferences drawn by the jury are reasonable and the evidence supporting the jury's finding is substantial. Gentry, at 598.

The Supreme Court has suggested that four characteristics of the crime should be examined when determining whether premeditation exists: motive, procurement of a weapon, stealth, and the method of killing. State v. Ortiz, 119 Wn.2d 294, 312, 831 P.2d 1060 (1992); State v. Pirtle, 127 Wn.2d 628, 644, 904 P.2d 245 (1995). When the factors enumerated in Ortiz are examined, it is apparent that a rational jury could have found that Elmi did indeed intend to kill Fadumo Aden, and that he possessed the necessary time to reflect before acting on that intent.

Elmi and Fadumo Aden were engaged in a bitter separation, the defendant being subject to a court order not to contact her. In the

afternoon of the shooting, Elmi had called Fadumo Aden and became very angry at her over a dispute involving a car, and Aden hung up on Elmi. A rational jury could infer that Elmi was so angry that he took steps necessary to shoot Ms. Aden. Fadumo Aden appeared at the window because she heard the argument outside when people were attempting to restrain Elmi. Elmi then fired at least four rounds from point blank range, right at the spot where Aden had been standing. While it was fortunate that Fadumo Aden was not hit, from the location of the bullets and the number of shots fired, a reasonable jury could infer that Elmi was trying to kill her.

More than a moment in time elapsed from the time Elmi had been able to observe Ms. Aden at the window, separate himself from the individuals trying to restrain him, and aim and fire several times in Ms. Aden's direction. If Fadumo Aden had been struck and killed by the rounds Elmi fired, it would have been reasonable for the jury to conclude that he had killed her with premeditation. Although Elmi missed, he took a substantial step toward the commission of premeditated murder. There was substantial evidence supporting the jury's conclusion that Elmi fired the shots with intent to kill Fadumo Aden, and that he had the premeditated intent to kill.

Elmi also argues that his first degree assault conviction for shooting at Fadumo Aden should be dismissed on double jeopardy grounds because it would constitute a multiple punishment for the same offense for which Elmi was convicted in the attempted murder count. Br. App. pp. 40-43. Elmi is correct that the assault in the first degree conviction in Count II pertaining to Fadumo Aden should be vacated. Because assault in the first degree has a lower seriousness level and a lower penalty when compared to the crime of attempted first degree murder, the assault conviction must be vacated. State v. Weber, 127 Wn. App. 879, 884-88, 112 P.3d 1287 (2005), rev. granted, 156 Wn.2d 1010 (2006) (S. Ct. No. 77395-5, argued 3-23-06). Thus, assuming this Court agrees that sufficient evidence existed for attempted premeditated murder, the assault in the first degree conviction should be vacated.

2. THERE WAS INSUFFICIENT EVIDENCE TO PROVE ASSAULT IN THE FIRST DEGREE IN COUNTS III, IV, AND V.

Elmi challenges the sufficiency of the evidence with regard to the three counts of first degree assault against the child victims, claiming that there was a lack of substantial evidence that Elmi intended to assault the children or that he intended to cause fear and

apprehension. This assignment of error appears to be well taken, because there was no evidence from which a rational jury could infer that Elmi knew the children were present when he fired the shots into the residence intending to kill Fadumo Aden. Thus, Counts III, IV, and V should be dismissed.

Assault in the first degree requires that a defendant, with intent to inflict great bodily harm, assault an individual with a firearm. RCW 9A.36.011(1)(a); Court's Instr. No. 16; CP 177. The jury in Elmi's case was given the standard instruction defining the three common law methods of committing assault. Court's Instr. No. 17; CP 178. Assault by battery did not apply in this case because the three children were not hit by bullets or flying glass.

Assault by attempted battery requires the specific intent to cause bodily injury; assault by attempt to cause fear and apprehension of injury requires the specific intent to do so. State v. Daniels, 87 Wn. App. 149, 940 P.2d 690 (1997). The attempted battery form of assault (an act done with intent to inflict bodily injury upon another but failing to accomplish that result) was not supported by the evidence in Elmi's case. There was no proof that he intended to inflict bodily injury upon any of the three children, nor was there proof that he knew that children were present in the room with

Fadumo Aden. Nor was there sufficient evidence that Elmi acted with intent to create apprehension and fear of injury in the children, or that the children were in apprehension and imminent fear of bodily injury at the time the shots were fired. Thus, the third form of common law assault was not satisfied.

The jury in Elmi's case was also given a transferred intent instruction. Court's Instr. No. 20²; CP 181. Elmi's defense counsel did not object to the giving of this instruction in the retrial before Judge McDermott. 22RP 4-7.³

Under Washington law, the concept of transferred intent does not appear to be applicable to this case. While appellate courts have upheld convictions where unintended victims were injured from a defendant's intentional assault against another person, or upheld convictions where there was substantial evidence that the defendant knew he was assaulting multiple persons, no case supports the

² Instr. No. 20 read:

If a person assaults a particular individual or a group of individuals with a firearm with the intent to inflict great bodily harm and by mistake, inadvertence, or indifference, the assault with a firearm took effect upon on an unintended individual or individuals, the law provides that the intent to inflict great bodily harm with a firearm is transferred to the unintended individual or individuals as well.

³ A different attorney for Elmi in the first trial did object to the transferred intent instruction. 11RP 82-86; 12RP 16-18.

conclusion that the transferred intent doctrine would support conviction when there was no evidence that a defendant was even aware of the presence of other individuals, who were not injured during the assault on another person.

In State v. Wilson, 125 Wn.2d 212, 883 P.2d 320 (1994), convictions of four counts of first degree assault were upheld when the defendant fired numerous shots into a busy tavern at a bartender and another individual, but instead struck two bystanders. Wilson obviously knew when he fired into the tavern that other patrons were present and could have been injured. While transferred intent was not necessary to sustain Wilson's conviction because the language of the first degree assault statute required only that the defendant assault "another" with a firearm, there was no requirement that the intent to inflict great bodily harm match a specific victim. Wilson, at 218. It was clear in Wilson, however, that the defendant was fully aware that other individuals were in the tavern at the time he fired the shots; thus, he was held accountable for the resulting injuries to those individuals.

In State v. Salamanca, 69 Wn. App. 817, 851 P.2d 1242 (1993), a defendant was held responsible for his participation as an accomplice to the shooting into a car containing five individuals. The

defendant and his accomplice had been involved in an earlier confrontation with the driver and occupants of the victim automobile. Between 20 and 45 minutes later, the defendant and his accomplice tracked down the victim's car and fired at least three shots at it, striking the car in three different places. One bullet fragment hit the head of the driver of the car. Division III held that because Salamanca and the shooter intended to inflict great bodily harm on all of the occupants of the vehicle, the trier of fact could infer the specific intent to assault each of the occupants. Implicit in Salamanca is the notion that the defendant was fully aware that the car contained numerous occupants at the time the shots were fired into and at the car. The evidence clearly supported an attempted battery or an assault creating fear and apprehension in the victims. The Salamanca court, like Wilson, also observed that the transferred intent instruction was not necessary for first degree assault because the statute only required that "another person" be assaulted and that person need not be the intended victim. However, any error in the giving of the instruction was found to be harmless under the facts of Salamanca.

State v. Bland, 71 Wn. App. 345, 860 P.2d 1046 (1993), is instructive. Bland fired shots at an individual named Jefferson, his

intended target. One of his shots went through the window of the home of a man named Carrington, who was sleeping on his recliner in his living room. Mr. Carrington was struck by flying glass. A transferred intent instruction was given. This Court reversed, and ordered a new trial on the second degree assault count pertaining to Mr. Carrington. The court found that the evidence, although it supported battery, was insufficient to prove assault by fear and apprehension, one of the alternative means upon which the jury had been instructed. The fact that Mr. Carrington became afraid after the shots did not establish common law assault by fear and apprehension. While the intent to assault could be transferred, the fear and apprehension could not.

In Elmi's case, it was not error to give the transferred intent instruction, particularly when there was a lesser-included offense of assault in the second degree for the jury to consider.⁴ In any event, the giving of the transferred intent instruction, to which there was no objection, is not the problem in Elmi's case. Rather, it is the failure of proof that Elmi committed an attempted battery or had any intent

⁴ Assault in the second degree, RCW 9A.36.021, does not have the transferred intent concept built into the statute and requires that a defendant assault a specific person with a deadly weapon. Court's Instr. No. 26; CP 187.

to inflict fear and apprehension upon the child victims. While Elmi would have been guilty of reckless endangerment or drive-by shooting regarding the child victims, those crimes were not charged. Instead, the State was required to prove either an attempted battery or an intent to create fear and apprehension upon the child victims, which it did not do. Thus, Elmi's challenge to the sufficiency of the evidence on Counts III, IV, and V is well taken. These counts, and the firearm enhancements for each of these counts, should be dismissed.

Elmi also claims that his right to jury unanimity was violated for the three convictions for assault in the first degree in Counts III, IV, and V, and that the imposition of firearm enhancements on those counts violated double jeopardy. Br. App. pp. 31-39, 43-49. None of these assignments of error has merit. However, in light of the State's concession regarding the sufficiency of the evidence pertaining to Counts III, IV, and V, these arguments will not be further addressed.

D. CONCLUSION

There was substantial evidence from which a rational jury could conclude that Elmi had a premeditated intent to kill Fadumo Aden. Elmi's conviction for first degree assault pertaining to

Ms. Aden should be vacated. Elmi's convictions for first degree assault relating to the child victims should be dismissed for insufficient evidence. Elmi's case should be remanded for resentencing for the crime of attempted first degree murder, with a special firearm enhancement.

DATED this 16 day of May, 2006.

Respectfully submitted,

NORM MALENG
King County Prosecuting Attorney

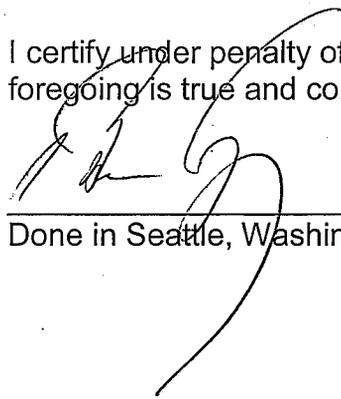
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Certification of Service by Mail

Today I deposited in the mail of the United States of America, postage prepaid, a properly stamped and addressed envelope directed to Oliver R. Davis, the attorney of record for the appellant, at the following address: Washington Appellate Project, 1511 Third Avenue, Suite 701, Seattle, WA 98101, containing a copy of the Brief of Respondent, in STATE V. ALI MOHAMMED ELMI, Cause No. 56460-9-1, in the Court of Appeals, Division I, of the State of Washington.

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



Done in Seattle, Washington

05/16/06

Date