LISA A. SMITTCAMP
DISTRICT ATTORNEY, COUNTY OF FRESNO
Elana A. Smith, SBN 188054
Senior Deputy District Attorney
2100 Tulare Street
Fresno, CA 93721
(559) 600-3141

Attorneys for Respondent

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF FRESNO

| | |
|---|---|
| In re DOUGLAS R. STANKEWITZ,<br><br>Petitioner,<br><br>On Habeas Corpus, | Case No.: 21CRWR685993<br><br>RESPONDENT'S CLOSING ARGUMENT |

Respondent respectfully submits the following brief in RESPONSE to Petitioner's "CLOSING ARGUMENT."

The Respondent will be objecting based upon these moving authorities, and upon such further argument and evidence as introduced on the hearing on Petitioner's requests. It is Respondent's position that Petitioner is barred from requesting the reintroduction of these

statements at this juncture. Additionally, it is Respondent's position that Petitioner does not have "new evidence" to present. For additional analysis and support, please refer to Respondent's "Return to Order to Show Cause" dated July 21, 2023.

1.

**PETITIONER HAS FAILED TO MEET THE BURDEN OF PROVING THEIR ALLEGATIONS IN THEIR PETITION**

Penal Code section 1473 fully provides:

(a) A person unlawfully imprisoned or restrained of their liberty, under any pretense, may prosecute a writ of habeas corpus to inquire into the cause of the Imprisonment or restraint.

(b) A writ of habeas corpus may be prosecuted for, but not limited to, the following reasons:

(1) False evidence that is substantially material or probative on the issue of guilt or punishment was introduced against a person at a hearing or trial relating to the person's incarceration.

(2) False physical evidence, believed by a person to be factual, probative, or material on the issue of guilt, which was known by the person at the time of entering a plea of guilty, which was a material factor directly related to the plea of guilty by the person.

(3)

(A) New evidence exists that is credible, material, presented without substantial delay, and of such decisive force and value that it would have more likely than not changed the outcome at trial.

(B) For purposes of this section, "new evidence" means evidence that has been discovered after trial, that could not have been discovered prior to trial by the exercise of due diligence, and is admissible and not merely cumulative, corroborative, collateral, or impeaching.

(4) A significant dispute has emerged or further developed in the petitioner's favor regarding expert medical, scientific, or forensic testimony that was introduced at trial and contributed to the conviction, such that it would have more likely than not changed the outcome of the trial.

(A) For purposes of this section, the expert medical, scientific, or forensic testimony includes the expert's conclusion or the scientific, forensic, or medical facts upon which their opinion is based.

(B) For purposes of this section, the significant dispute may be as to the reliability or validity of the diagnosis, technique, methods, theories, research, or studies upon which a medical, scientific, or forensic expert based their testimony.

(C) Under this section, a significant dispute can be established by credible expert testimony or declaration, or by peer reviewed literature showing that expert in the relevant medical, scientific, or forensic community, substantial in number or expertise, have concluded that developments have occurred that undermine the reliability or validity of the diagnosis, technique, methods, theories, research, or studies upon which a medical, scientific, or forensic expert based their testimony.

(D) In assessing whether a dispute is significant, the court shall give great weight to evidence that a consensus has developed in the relevant medical, scientific, or forensic community undermining the reliability or validity of the diagnosis, technique, methods, theories, research, or studies upon which a medical, scientific, or forensic expert based their testimony or that there is a lack of consensus as to the reliability or validity of the diagnosis, technique, methods, theories, research, or studies upon which a medical, scientific, or forensic expert based their testimony.

(E) The significant dispute must have emerged or further developed within the relevant medical, scientific, or forensic community, which includes the scientific community and all fields of scientific knowledge on which those fields or disciplines rely and shall not be limited to practitioners or proponents of a particular scientific or technical field or discipline.

(F) If the petitioner makes prima facie showing that they are entitled to relief, the court shall issue an order to show cause why relief shall not be granted. To obtain relief, all the elements of this paragraph must be established by a preponderance of the evidence.

(G) This section does not change the existing procedures for habeas relief.

(c) Any allegation that the prosecution knew or should have known of the false nature of the evidence referred to in paragraphs (1) and (2) of subdivision (b) is immaterial to the prosecution of a writ of habeas corpus brought pursuant to paragraph (1) or (2) of subdivision (b).

(d) This section does not limit the grounds for which a writ of habeas corpus may be prosecuted or preclude the use of any other remedies.

(e) (1) For purposes of this section, "false evidence" includes opinions of experts that have either been repudiated by the expert who originally provided the opinion at a hearing or trial or that have been undermined by the state of scientific knowledge or later scientific research or technological advances.
(2) This section does not create additional liabilities, beyond those already recognized, for an expert who repudiates the original opinion provided at a hearing or trial or whose opinion has been undermined by scientific research, technological advancements, or because of a reasonable dispute within the expert's relevant scientific community as to the validity of the methods, theories, research, or studies upon which the expert based their opinion.

(f) Notwithstanding any other law, a writ of habeas corpus may also be prosecuted after judgment has been entered based on evidence that a criminal conviction or sentence was sought, obtained, or imposed in violation of subdivision (a) of section 745, if that section applies based on the date of judgment as provided in subdivision (k) of section 745. A petition raising a claim of this nature for the first time, or on the basis of new discovery provided by the state or other new evidence that could not have been previously known by the petitioner with due diligence, shall not be deemed a successive or abusive petition. If the petitioner has a habeas corpus petition pending in state court, but it has not yet been decided, the petitioner may amend the existing petition with a claim that the petitioner's conviction or sentence was sought, obtained, or imposed in violation of subdivision (a) of section 745. The petition shall state if the petitioner requests appointment of counsel and the court shall appoint counsel if the petitioner cannot afford counsel and either the petition alleges facts that would establish a violation of subdivision (a) of section 745 or the State Public Defender requests counsel be appointed. Newly appointed counsel may amend a petition filed before their appointment. The court shall review a petition raising a claim pursuant to section 745 and shall determine if the petitioner has made a prima facie showing of entitlement to relief. If the petitioner makes a prima facie showing that the petitioner is entitled to relief the court shall issue an order to show cause why relief shall not be granted and hold an evidentiary hearing, unless the state declines to show cause. The defendant may appear remotely, and the court may conduct the hearing through the use of remote technology, unless counsel indicates that defendant's presence is needed. If the court determines that the petitioner has not established a prima facie showing of entitlement to relief, the court shall state the factual and legal basis for its conclusion on the record or issue a written order detailing the factual and legal basis for its conclusion.

In the present matter, after the pleadings were filed, the court ordered an evidentiary hearing. *In re Lawler* (1979) 23 Cal.3d 190, 194. See also Cal Rules of Ct 4.551(f); *In re*

*Rhoades* (2017) 10 Cal.App.5th 896, 910. At the evidentiary hearing, the petitioner carries the burden of proof by a preponderance of the evidence. *In re Crew* (2011) 52 Cal.4th 126, 149. The hearing is conducted in accordance with the rules of evidence. Evidence Code 300; *In re Fields* (1990) 51 Cal.3d 1063. Out-of-court declarations are not admissible unless they come within a hearsay exception. Evidence Code 1200; *In re Fields,* supra. The main reason for holding an evidentiary hearing in a habeas matter is to obtain credibility determinations. *In re Scott* (2003) 29 Cal.4th 783, 824. The court's conclusions of law, as well as resolutions of mixed questions of law and fact, are subject to independent review by the appellate court. *In re Crew*, supra; *In re Johnson* (1998) 18 Cal.4th 447, 461; *In re Williams* (1994) 7 Cal.4th 572. The court has broad powers to fashion almost any relief and may grant all or part of the relief requested without ever formally granting the writ of habeas corpus itself. See, e.g., *In re Frye* (1983) 150 Cal.App.3d 407. However, the court is restricted from granting relief by resolving issues that are not explicitly or implicitly raised by the habeas petition. *In re Stevenson* (2013) 213 Cal.App.4th 841, 858.

**1.**

**No New Evidence exists, as Petitioner failed to meet the burden of proof**

New evidence, or more accurately, newly discovered evidence, is a basis for relief if it is "credible, material, [and] presented without substantial delay" and is "of such decisive force and value that it would have more likely than not changed the outcome at trial." Penal Code section 1473(b)(3)(A). See *In re Sagin* (2019) 39 Cal.App.5th 570, 580; *People v. Murillo* (2021) 71 Cal.App.5th 1019. New evidence is evidence "that has been discovered after trial, but could not have been discovered before trial by exercise of due diligence, and is admissible and not cumulative, corroborative, collateral or impeaching." Penal Code 1473(b)(3)(B).

In the present matter, the Petitioner has failed to meet their burden of presenting any evidence that was: a) credible, b) material, c) presented without substantial delay, or d) of such decisive force and value that it would have more likely than not changed the outcome at trial. Most of the evidence presented by Petitioner did not come into evidence, and that which did was not of such decisive force and value that it would have more likely than not changed the outcome at trial 40 years ago.

Furthermore, Petitioner has failed to meet their burden of presenting proof that any of the evidence that Petitioner was permitted to enter into the record was: a) evidence that was discovered after trial, b) that could not have been discovered prior to trial by the exercise of due diligence, and c) not merely cumulative, corroborative, collateral, or impeaching. Here, Petitioner makes many arguments that are cumulative, collateral or impeaching, at best, but do not amount to "new evidence," "false evidence" or "false science"

**A.**

**The Murder Weapon & Holster**

Petitioner first urges that the weapon that came into evidence against him was false evidence under PC 1473(b)(2), further alleging that the weapon subsequently was found to have a serial number when it was allegedly initially recovered without one, which also constitutes new evidence under PC 1473(b)(3).

**1.**

**Serial Number**

At the current trial, the evidence clearly demonstrated that when the murder weapon was seized in 1978, it had an unreadable number in the middle of the weapon's serial number; the officer who booked it into evidence had difficulty getting a complete serial number, so he

marked it on his records as removed. Upon a subsequent and more thorough examination of the weapon's serial number by officials, [no report was generated of this examination process] a complete full number could be read, and this number was subsequently handwritten onto law enforcement records, which was not unusual for the time. Petitioner's expert opined that something was used to clean and make the full number readable, and that a report would typically be generated of that cleaning process under modern police practices.

Likewise, Petitioner chides his former trial counsel, and all his former appellate counsel, for Ineffective Assistance for failing to investigate this issue or bring it up.

Respondent believes that this issue was meritless and would have resulted in wasted time and resources for Petitioner's defense teams. Petitioner failed to demonstrate that a different result would have occurred, and Petitioner was not prejudiced by his former defense counsel's refusal to throw this smoke bomb at trial, or bring it up before in prior proceedings for tactical reasons.

**2.**

**Holster**

Petitioner next argues that the .25 gun and holster, evidence item 5A at his trial, was in law enforcement custody prior to the shooting of Teresa Graybeal, and that this proves that the weapon at trial was not the gun used to kill, and that said items were actually planted by law enforcement. This is quite a stretch!

Petitioner asserts in their moving papers that the holster had "law enforcement number engraved on it 5 years prior to the shooting of Ms. Graybeal." Petitioner asserts that this fact, combined with the above-referenced serial number issue, proves law enforcement framed him and planted the gun, and that the gun in evidence is "false evidence."

At the present trial, Petitioner brought out the holster, with visible etchings of a date, accompanied by some letters on the holster from trial Exhibit 5A, to support its contention that the gun in evidence was not the actual murder weapon, and that it was planted by law enforcement. However, Petitioner failed to prove that the etchings on the holster belong to any specific law enforcement officer or are related to a specific law enforcement case, or that the holster was ever actually in police custody. Petitioner also failed to present evidence about the timing of when the etchings were made on the holster, by whom, or for what reason. The gun itself had no date etchings.

While the holster and weapon came into evidence as Exhibit 5A at Petitioner's trial, the trial transcript clearly shows that the gun was not located within the holster when both the gun and holster were found by officers inside the vehicle in 1978. Also, as acknowledged by Petitioner in his moving papers, at least one independent witness provided information to law enforcement that the gun case was in the vehicle and used on Teresa Graybeal.

This argument is simply a red herring. At the present trial, Petitioner's experts agreed that old evidence collection and retention methods are just that, old, and that adaption and modern science and techniques have improved law enforcement collection and retention methods. While the expert thought a report documenting the subsequent exam and potential cleaning of the serial number would be generated now, he was not surprised a report was not generated about that process in the late 1970's. Likewise, the expert opined that the older methods were not symptoms of malicious law enforcement actions, but often the result of a variety of innocent reasons. Finally, Petitioner's expert even agreed that many holster cases fit multiple weapons, and that no one could be sure if the holster was actually meant to go with the weapon in question; they were simply found within the same vehicle by law enforcement in 1978. In sum,

Petitioner has failed to meet their burden of proof to show "false evidence", or "new evidence," in regard to the .25 gun and holster contained in trial Exhibit 5A.

As the issue cited by Petitioner is a "red herring," none of Petitioner's prior attorneys were ineffective for not investigating this or failing to bring it up in formal legal proceedings.

**B.**

**Meras shell casings**

A robbery occurred to Jesus Meras close in time to the date Teresa Graybeal was murdered by Petitioner. Officers believed the Petitioner might be involved and did some investigations. Twenty-two caliber shell casings were found near that robbery scene, known now as Meras; those were packaged up by law enforcement back in 1978. Subsequently, law enforcement sought to compare the .22 casings from the Meras incident with the .25 casings found at the Graybeal murder scene, to see if there were any connections. No connections were subsequently found, the victim never formally identified as the suspect, and the shell casings went back into law enforcement storage.

In the instant matter, the Petitioner recently brought a request to retest the weapon and casings found at the crime scene. After law enforcement refused to retest those items, Petitioner's legal team was permitted to retest the gun.

Petitioner's legal team sought to examine these items of property; DA Investigator Danielle Isaac was given an orange box by law enforcement, and she delivered that box to Defense consultant Chris Coleman in Hayward, CA. During transport an item fell out of the box and Investigator Isaac put it back inside. When the box was opened by Chris Coleman, it was found to be in disarray. Additionally, Coleman found a mix-up in the casings.

Petitioner now asserts that this mix-up raises "red flags" about the integrity of that evidence from 1978. Petitioner goes on to assert that these facts should have been investigated by all counsel, making them all ineffective for failing to do so. However, absent speculation and connecting of unsupported assertions and facts, Petitioner has failed to meet their burden of demonstrating by a preponderance that this simple mix up is "relevant" or "new evidence," or that said mix-up somehow supports their "false evidence" claim, or that any different result would have occurred had Petitioner's prior counsels spent their valuable time chasing down this dead end.

**C.**

**Bullet Trajectory**

Back in 1978, pathologists determined that Teresa Graybeal was shot at an "up angle. Petitioner next asserts that the bullet trajectory was flawed and false evidence, and that trial counsel, along with all appellate counsel, were ineffective for failing to act in numerous ways, including allowing a hypothetical at trial, failed investigations and failure to consult or utilize experts on this subject.

Back in the 1980's, at Petitioner's second trial, the jury had before it the Petitioner's measurements, conflicting heights of the victim, and a relative angle of the shot from a pathologist; with this evidence, inter alia, the jury at Petitioner's second jury trial found him guilty, as they were convinced beyond a reasonable doubt that the defendant was the shooter of Teresa Graybeal.

Yet here, Petitioner's current legal team asserts that the discrepancy in the Victim's height is new evidence, and that all of Petitioner's legal team was Ineffective for failing to take actions about the discrepancy while they were at the helm. This assertion overlooks all of the

variables that could go into a bullet trajectory determination, many of which were unknown during the trial of the instant matter back in the 1980's. Pathologists were unable to determine the caliber of the gun used in this murder based on Teresa Graybeal's headwound; modern technology makes this job no easier.

Petitioner has failed his burden of proving that "false evidence" was used against him in this regard, or that "new evidence" exists regarding bullet trajectory or the effect that a dispute in victim's height would have on that trajectory. Petitioner also failed to bring in "new science" on the topic, or meet the burden of demonstrating that the science at his trial was flawed. Finally, Petitioner has failed to prove his prior counsel were ineffective in this regard, as no prejudice was demonstrated or different outcome shown.

**D.**

**Billy Brown "recant"**

Billy Brown was a juvenile who testified at Petitioner's prior trials that Petitioner was the shooter of Teresa Graybeal. Mr. Brown has since passed away.

Petitioner first asserted in the instant matter that a Billy Brown "recant" would come into evidence as "new evidence," and proof that "false evidence" was being used against him at his trial.

The present court properly refused to allow that "recant" into evidence. The "recant" consisted of a declaration of Brown, along with a transcript prepared by an unknown person and no audio recording. The Court found that Brown was not under oath, and facing no consequences for his "recant," and denied admission of the hearsay information into evidence as unreliable hearsay.

Petitioner argues that his trial counsel, Hon. Hugh Goodwin (Ret.'d), was ineffective for failing to talk with a pathologist, ballistics expert, blood pattern expert, or scene reconstruction expert to attack Billy Brown's testimony at trial; however, Petitioner presently called none of those types of experts to explain that they could have assisted Petitioner's matter, or that a different result would have been obtained had they been called upon.

Petitioner then argues that Appellate counsel was ineffective for failing to follow up properly on the alleged Billy Brown recant almost 15 years after Petitioner's initial conviction for killing Teresa Graybeal. However, the record at the instant trial clearly shows that appellate counsel Robert Bryan was aware of Billy Brown, and a possible "recant," as appellate counsel specifically assigned an investigator to look into it. Interestingly, if said "recant" actually happened as asserted by Petitioner, appellate counsel would have had no reason or motive to not divulge it immediately to support Petitioner's cause or seek a continuance to do so. However, that is not what happened. Instead, "the recant" was never presented or pursued further by any appellate counsel, which would make sense as Petitioner's proffered evidence of this alleged recant is uncorroborated hearsay, at best, and most appellate counsel are aware of their ethical obligation not to present frivolous claims.

**2.**
**Petitioner's claims of Inadequate Representation fail due to Petitioner failing to meet the burden of proof**

To establish ineffective assistance of counsel under federal law, a defendant must show that counsel's representation fell below the standard of reasonableness under prevailing professional norms, and that counsel's deficient performance was prejudicial, i.e., that a reasonable probability exists that, but for counsel's failings, the result would have been more favorable to the defendant. *Strickland v. Washington* (1984) 466 U.S. 668, 687: *In re Gay* (2020)

8 Cal.5th 1059, 1086; *In re Cudio* (1999) 20 Cal.4th 673, 687. In determining whether trial counsel fell below the standard of reasonableness, the court employs a strong presumption of competence. *Strickland*, 466 U.S. at 689; *In re Crew*, 52 Cal.4th at 150.

Petitioner's brief is full of attacks on all of his prior counsel for various errors he asserts they made during his trial, and all of his respective appeals. However, a reviewing court generally defers to trial counsel and avoids second guessing counsel as to matters of strategy and tactics. Furthermore, other than speculation from one hired expert over 40 years after the fact, with no "new evidence" or proof of "false evidence" satisfactorily proven to this Court, the court is left to find that Petitioner has failed to meet the burden of proving that any of his former counsel were ineffective, or that a different result was likely.

**3.**

**Petitioner's claims of Misuse of Evidence fail due to Petitioner failing to meet the burden of proof**

Knowing use of perjured testimony by the prosecution can be reversible per se, and can be grounds for nullifying the judgment on habeas corpus, depending on whether the defendant was denied a fair trial. See *In re Mooney* (1937) 10 Cal.2d 1, 14 (stating rule expressed in *Mooney v. Holohan* (1935) 294 U.S. 103).

Penal Code 1473 provides that the petitioner's writ may be prosecuted in either of the following circumstances: (a) "false evidence that is substantially material or probative on the issue of guilt or punishment was introduced against a person at any hearing or trial related to his incarceration" (PC 1473(b)(1)), or (b) "false physical evidence, believed by a person to be factual, probative, or material on the issue of guilt," was known by the person and was a material factor in his or her guilty plea" (PC 1473(b)(2)).

The Petitioner must establish by a preponderance of evidence: (1) that there was perjury, (2) that this was known by representatives of the state, and (3) that it may have affected the outcome of the trial. *In re Imbler* (1963) 60 Cal.2d 554, 560; *In re Wright* (1978) 78 Cal.App.3d 788, 808.

In the present matter, Petitioner asserts that the District Attorney from Trial One, and District Attorney from Trial Two, knowingly presented false evidence. The Petitioner has failed to meet their burden in this regard.

Additionally, Petitioner asserts that the current District Attorney has likewise prosecuted with false evidence, and that new evidence of Brady violations and evidence of misconduct has been shown. The Petitioner has failed to meet their burden in this regard, as well.

**4.**

**Petitioner has failed to meet the burden of proving any reversible error occurred**

Only if an error is so fundamental in nature that it affects the structural integrity of the trial will the reviewing court reverse a trial court's judgment without a showing that the error has had some impact on the outcome of the proceedings. *Arizona v. Fulminante* (1991) 499 U.S. 279, 309; *Neder v. US* (1999) 527 US 1, 8. Most errors that result in some type of constitutional violation, even errors that infringe on a fundamental right, do not result in automatic reversal; constitutional errors that are subject to harmless error analysis are evaluated under the stringent standard enunciated in *Chapman v. California* (1967) 386 US 18, 24. As restated in *Neder*, supra, 527 US at 18, "[i]s it clear beyond a reasonable doubt that a rationale jury would have found the defendant guilty absent the error?" The major exception to this rule that constitutional errors are reviewed under the *Chapman* standard is ineffective assistance of counsel. Although the right to counsel conferred by the 6th Amendment necessarily entails the right to the effective

assistance of counsel, an attorney's error will not be held to deprive a defendant of constitutionally effective counsel unless the defendant establishes that there is reasonable probability that the result would have been different if trial counsel's performance had not been deficient. *Strickland v. Washington* (1984) 466 US 668, 694.

In the present matter, Petitioner has failed to meet their burden of proof to demonstrate any reversible error. Petitioner has asserted a series of items, few factual or relevant, but mostly speculative, and simply wound them together leading to the Petitioner's conclusion that the gun in Trial Exhibit 5A was planted. The mix-up on shell casing appears to be nothing more than human error in post-investigative handling. The etchings on the holster remain unknown and are irrelevant. There is also no DA misconduct or Brady violations involved with either assertion. No forensic evidence was presented regarding the purported "blood stains," or even if the substances could be "blood." The date marking complained of on the holster proves nothing, and Petitioner failed to prove anything further on it, while also acknowledging that witnesses put that gun case inside the murder vehicle prior to the Petitioner's shooting of Teresa Graybeal.

Petitioner next asserts that trial counsel, and all counsel, were ineffective for a variety of failures regarding all of these allegations. At this trial, Petitioner's expert even speculated that he believed that at least one juror would have changed their verdict had the defense team mounted a vigorous defense on these issues, which is pure speculation and uncorroborated by any further evidence or juror declarations. However, no counsel is required to expend valuable time and resources on irrelevant theories or suppositions.

## CONCLUSION

Respondent requests that Petitioner's entire Writ be denied and that he be resentenced forthwith.

Dated: April 30, 2024

Respectfully submitted,

LISA A. SMITTCAMP
DISTRICT ATTORNEY

By: _____
ELANA A. SMITH
Senior Deputy District Attorney

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF FRESNO:

I am employed in the County of Fresno, State of California. I am over the age of 18 and not a party to the within action; my business address is FRESNO COUNTY DISTRICT ATTORNEY'S OFFICE, 2100 Tulare Street, Fresno, California 93721.

On April 30, 2024 , I served the following document(s) described as:

**Respondent's Closing Argument**
**Regarding People vs. Douglas R. Stankewitz**

on the interested parties in this action:

**Curtis L. Briggs & Marshall D. Hammons**
**1211 Embarcadero Ste 200**
**Oakland, CA 94606**
**briggslawsf@gmail.com marshall@esilverlaw.com**

**J. Tony Serra**
**350 Townsend St STE 307**
**San Francisco, CA 94107**
**jts@pier5law.com**

____ By placing a true copy thereof enclosed in a sealed envelope addressed to the above-listed parties.

____ **BY MAIL.** I deposited said document in the mail at Fresno, California, with postage thereon fully prepaid.

____ **BY TELECOPY (FAX).** I delivered said document by telecopy (fax) to the telecopy telephone number located at the address listed above.

____ **BY PERSONAL SERVICE.** I delivered copies of said document(s) by hand.

xx **BY EMAIL.** I delivered said document(s) via email to address listed above.

XX **(State) I** declare under penalty of perjury under the laws of the State of California that the above is true and correct.

____ **(Federal)** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

EXECUTED on April 30, 2024 , at Fresno, California

Francisca Rendon-Zamora — F. Rendon-Z

(Type or Print Name) (Signature)

DA#: 1978H1 Court#:21CRWR685993 & CF78227015