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SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO

CENTRAL DIVISION

DOUGLAS R. STANKEWITZ, Petitioner, On Habeas Corpus.	Case No. 21CRWR685993 PETITIONER'S EVIDENTIARY HEARING REBUTTAL BRIEF (Fresno Superior Court Case #CF78227015)

TO THE HONORABLE ARLAN L. HARRELL, JUDGE, SUPERIOR COURT FOR THE COUNTY OF FRESNO AND TO THE DISTRICT ATTORNEY FOR THE COUNTY OF FRESNO:

Petitioner DOUGLAS R. STANKEWITZ, through counsel, hereby files his Evidentiary Hearing Rebuttal Brief.

I. INTRODUCTION[1]

Respondent's Closing Argument Brief (hereinafter RCAB), speaks volumes in what it fails to address – the lion's share of Petitioner's evidentiary hearing evidence and Petitioner's Closing

[1] References to the Evidentiary Hearing transcript are cited as: (p ___, ln ___)

Argument Brief (hereinafter PCAB) arguments. In their Closing Argument Brief, Respondent makes a lot of general assertions without giving pin cites to the Evidentiary Hearing (hereinafter EH) record. This starts on p 2, ln 1 – 3 when they state that Petitioner does not have any "new evidence" to present and cite their Return for this position. Given the Evidentiary Hearing in this Court, there is now considerable additional evidence subsequent to the filing of the Return. Without pin cites, it is difficult to know which testimony they are referring to, if any. We have only addressed the points that are contained in the RCAB.[2] They don't refute most of Petitioner's evidence: not at the EH through cross, nor with their own expert testimony. As we point out below, they make many statements that are not supported by any evidence. As explained below, *inter alia,* Petitioner presented considerable new evidence.

Respondent cites incorrect statutory law for Penal Code section 1473. Under the statute revisions effective 1/1/24, the correct and applicable sections of 1473 for false evidence and new evidence are as follows[3]:

(b) (1) A writ of habeas corpus may be prosecuted for, but not limited to, the following reasons:

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

(3) Any allegation that the prosecution knew or should have known of the false nature of the evidence is immaterial to the prosecution of a writ of habeas corpus brought under subparagraph (A) or (B) of paragraph (1).

(C) (i) New evidence exists that is presented without substantial delay, is admissible, and is sufficiently material and credible that it more likely than not would have changed the outcome of the case.

(ii) For purposes of this section, "new evidence" means evidence that has not previously been presented and heard at trial and has been discovered after trial. [Emphasis added for clarity.]

The change in the statute is important because under the new law, the burden for the

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[2] When Petitioner has already discussed a point in his PCAB, he refers to its discussion in the PCAB, rather than restating it.

[3] Petitioner explained the changes to Penal Code section 1473 in his Pre-Hearing Brief filed with this Court just prior to the EH.

Petitioner is less for both false evidence and new evidence. As explained in the PCAB, Petitioner's burden of proof is merely a preponderance of the evidence. (See PCAB, p 12, ln 8 – 18)

II. INEFFECTIVE ASSISTANCE OF COUNSEL (HEREINAFTER IAC) (PCAB SECTIONS V & VI)[45]

Respondent acknowledges that Strickland is the standard for IAC. (RCAB p 15, ln 15 – 20) Strickland requires proof of deficient performance and that the defendant was prejudiced by the deficient performance such that it 'deprived a defendant of a fair trial, a trial whose result is reliable'[6]

As discussed in the PCAB, in *In re Jones*, where Goodwin represented Troy Jones in a very similar case, the CA Supreme Court found that Goodwin was ineffective in the guilt phase. (See PCAB, p 14)

A. Deficient performance

Respondent correctly states that Petitioner alleges that counsel were ineffective for a variety of failures. Indeed, counsel was ineffective for the following: (1) failure to investigate the weapon and serial number; (2) failure to investigate the holster; (3) failure to investigate the bullet trajectory; (4) failure to investigate the recant.

1. Failure to investigate the weapon and serial number

Respondent states that Petitioner alleges failure to investigate the weapon (see RCAB p 7, ln 7 – 8). This failure is supported by Gibson's testimony. (PCAB p 17, ln 8 – 14) Petitioner's IAC expert Gibson demonstrated prejudice. (See PCAB p 22, ln 10 – p 23, ln 16) There is no evidence that this failure was for tactical reasons. In fact, Gibson testified that due to Goodwin's failure to investigate, the possibility that he could make strategic decisions was eliminated. (PCAB p 17, ln 8 – 14) Prior lawyers testified that they did not have tactical reasons for failing to investigate gun

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[4] At the time of T2, this was a special circumstances death penalty case. Therefore, as explained by Gibson, the standards for IAC are greater.

[5] The organization of this brief, Petitioner's Evidentiary Hearing Rebuttal brief follows the same organization as his Closing Argument Brief (hereinafter referred to as PCAB).

[6] *Strickland v. Washington* (1984) 466 U.S. 668, 687

issues. (See PCAB, VI. Claim 13 Appellate and Habeas Counsel, at 23 - 31)

Respondent states that the serial number issue is meritless and that Petitioner was not prejudiced by his former defense counsel's refusal to bring it up for tactical reasons. (RCAB p 7, ln 7 – 13). However, a review of the EH record reveals that Respondent didn't cross examine post-conviction counsel about whether it was a tactical decision not to investigate the gun.[7] Further, post-conviction counsel were questioned on direct about why they did not pursue investigation. (See PCAB, VI. Claim 13 IAC Appellate and Habeas Counsel, p 23 – 31)

2. Failure to investigate the holster

(RCAB p 9, ln 3 – 4) Respondent states that none of petitioner's prior attorneys were IAC for failing to investigate the holster or bring it up legally. However, Gibson testified to the contrary (p 448, ln 3 - 8)

(RCAB p 10, ln 2 – 4) Respondent states that Petitioner says these facts should have been investigated by prior counsel. This is not our position because these events just occurred in 2023 - 2024. Current counsel only became aware of this issue in 2023. (See PCAB, p 60, ln 21 – p 61, ln 6)

3. Failure to investigate the bullet trajectory

(RCAB p 10, ln 11 – 15) Respondent states that Petitioner asserts that bullet trajectory was flawed and false evidence, that trial counsel was ineffective for failing to act, including allowing hypothetical at trial (victim 5'7"); failed to investigate or consult experts. These allegations are supported by Gibson's testimony. (See PCAB, p 19, ln 18 – p 21, ln 14)

(RCAB p 10, ln 21 - 23) Respondent states that Petitioner asserts that the discrepancy in the victim's height is new evidence and that Petitioner's legal team was IAC for failing to take action about the discrepancy. These assertions are supported by Gibson's testimony (See PCAB, p 19, ln

[7] Respondent didn't present any witnesses nor evidence, including calling any of Petitioner's counsel regarding whether it was a tactical decision not to inspect the evidence, including the gun and holster.

18 – p 21, ln 14)

(RCAB p 11, ln 9 – 10) Respondent states that Petitioner failed to prove that prior counsel were ineffective regarding height/trajectory and that Petitioner was prejudiced. These assertions are supported by Gibson's testimony. (See PCAB p 19, ln 18 – p 21, ln 14)

4. Failure to investigate the recant

(RCAB p 11, ln 1 – 5) Respondent's theory about why the recant was not followed up on was speculative and is not supported by anything in the record. The failure of the recant process also demonstrates that there were things that appellate counsel could have followed up on but did not. Respondent did not call post-conviction counsel to support their position. Respondent brought no evidence into the record to show that Goodwin was effective.

(RCAB p 13, ln 5 – 7) Respondent states that a reviewing court generally defers to trial counsel and avoids second guessing as to matters of strategy and tactics. However, counsel's failure to investigate means that there is no tactical basis for trial strategies. (See PCAB p 14, ln 12 – 14, ln 16 – 20) Respondent says speculation by Gibson 40 years after the fact is insufficient. However, Gibson has 33 years' experience as a trial lawyer, much of it with murder cases, therefore his opinion is based on experience, not rank speculation. (p 435, ln 2 - 3)

(RCAB p 13, ln 13 – 17) Respondent concedes that the knowing use of perjured testimony by the prosecution can be reversible per se and be grounds for nullifying the judgement on habeas, depending on whether the defendant was denied a fair trial. However, they simply state that Petitioner hasn't met his burden on this issue, but do not refute the examples of perjured testimony outlined in the PCAB on p 72 – 73.

(RCAB p 14, ln 21 – p 15, ln 4)

B. Materiality

Gibson testified that at least one juror would have changed their verdict. (PCAB p 22, ln 21 – 27)

Petitioner didn't provide evidence from jurors because the information is not available from the court – Petitioner requested juror questionnaires. (See Habeas Petition Exhibit 14b) Further, the District Attorney's office did not produce any juror notes from their files.[8]

Respondent stated Mr. Stankewitz's IAC expert's opinion that "at least one juror would have changed the verdict…is pure speculation and uncorroborated by any further evidence or juror declarations." (RCAB, p. 15.) Petitioner is not obligated to get a declaration from a juror. In fact, juror declarations have been deemed unnecessary, as this analysis "is not subjective but rather is an objective one based on all the evidence, old and new, whether any second trier of fact, court or jury, would probably reach a different result." (People v. Huskins (1966) 245 Cal.App.2d 859, 862.)

III. FALSE EVIDENCE (PCAB SECTION VII)

Regarding false evidence, Respondent again cites incorrect statutory law. (See RCAB, p 13, ln 18 – 21). 1473(b)(2) does not apply here. The correct applicable law is: 1473(b)(1)(A) and 1473(b)(3):

(b) (1) A writ of habeas corpus may be prosecuted for, but not limited to, the following reasons:

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

(3) Any allegation that the prosecution knew or should have known of the false nature of the evidence is immaterial to the prosecution of a writ of habeas corpus brought under subparagraph (A) or (B) of paragraph (1).

In discussing the murder weapon evidence (RCAB p 6, ln 15 - 18), Respondent again cites incorrect statutory law. The correct statute for false evidence is 1473(b)(1) (see statute text, supra) The correct statute for new evidence is 1473(C)(i) and (c)(ii) (see statute text, supra at p. 2 and infra at p. 10).

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[8] The 1978 discovery motion and order from this court provides that Petitioner/defendant is entitled to all notes from the district attorney's file.

(RCAB p 6, ln 21) Despite using the word 'trial'[9], it appears that Respondent is referring to the evidentiary hearing.

A. Gun Serial Number

(RCAB p 6, ln 21) Respondent's statements that 'when the murder weapon was seized in 1978, it had an unreadable number . . .' are all speculation, unsupported by any evidence; there are no pin cites to the EH transcript. Further, their statement that 'evidence clearly demonstrated that it had an unreadable number, the officer who booked it, so he marked it as removed' is not supported by the evidence. They concede no report was generated regarding this. Coleman testified that the numbers on the weapon were visible. (p 93, ln 20)

Clark stated that based on the standards in 1978, a supplemental report should have been prepared. (p 118, ln 2 – 11) Coleman testified that he would expect to see some sort of documentation generated under then existing practices (p 100, ln 3) Both Clark (Clark p 41, ln 14 – 16 & p 62, ln 15 - 18) and Coleman testified regarding the chemical process, stating that there was not a chemical restoring of the serial number. (p 208, ln 3 – 4 & 17 – 21). Respondent's statement about it being unusual at the time not to prepare a report (RCAB p 7, ln 4), is not supported by any evidence. Clark testified that he was with the LA Sheriff's department starting in 1965, so he was familiar with procedures starting then. (p 33, ln 6 – 7)

B. Holster

(RCAB p 7, ln 20 – 23) Respondent discusses Petitioner's allegations regarding the law enforcement number on the holster. The existence of the law enforcement number on the holster was established by Coleman's testimony (p 201, ln 10) and the FACL report (HE 14), not in Petitioner's moving papers. At the EH, Isaac conceded that the holster has a second date from 1973 on it. (p 528, ln 2 – 9) Both Clark and Coleman stated that given that documentation in this

[9] The RCAB refers to 'trial' in numerous places (see p 8, ln 1; p 8, ln 14; and p 15, ln 16. However, this was an evidentiary hearing, not a trial.

case was not up to standards, it makes it more likely that the gun was planted. (Clark p 97, ln 8 – 14 & 18 – 25) (Coleman p 260, ln 1 – 7)

(RCAB p 8, ln 4 – 7) Respondent refers to letters on the holster but there are no letters on the holster. Petitioner concedes that despite considerable efforts, including contacting the Sacramento detective with the badge number 351 in 1973, he is unable to prove to whom the 1973 etching belongs. Clark testified that based on the etching, the holster was seized by an officer in 1973. (p 67, ln 25 – p 68, ln 2.)

(RCAB p 8, ln 9 – 11) Respondent states that the T2 transcript shows that the gun was not located within the holster. However, lack of proper documentation, including photos, makes it unknown whether that is true or not. (Clark p 71, ln 1 – 19) Respondent states that one independent witness (unnamed) provided information that the gun case was in the vehicle and used on the victim). If they are referring to a statement by Marlin Lewis, and accepting it as true, then they must accept Marlin's other statements contained in PCAB at 9, ln 15 – 11, as true.

(RCAB P 8, ln 14 – 19) Without a pin cite, Respondent states that old evidence collection and retention methods are different from modern science and techniques. However, Clark and Coleman testified that the 1978 methods were the same in this part of investigation as they are now. (See this brief, supra at 6, ln 18 - 21)

(RCAB p 8, ln 21 – 23) Respondent states that many holster cases fit multiple weapons and no one could be sure that the holster was actually meant to go with the weapon. However, the prosecution has always presented them as going together. (See PCAB at 37 – 38) Also, the prosecution stipulated at the EH that the Titan 25 in evidence could be carried in the holster marked 3A. (p 123, ln 25 – p 124, ln 10)

C. Bullet Trajectory

(RCAB p 10, ln 16 – 20) Respondent states that at T2, the jury had Petitioner's measurements.

Further that the jury had the conflicting heights of the victim. However, they did not cite to the T2 record. The expert testimony from Tovar (see PCAB, Section VII.C. FALSE EVIDENCE #3: The victim was 5'7") and Gibson (PCAB, p 20, ln 26 – p 21, ln 14) is that the jury only had the testimony of the victim's father and the hypothetical of Boudreau, giving the victim's height to be 5'7". The jury did not have the autopsy report, nor any other testimony regarding the victim's actual height.

(RCAB p 11, ln 1 – 2) Respondent states that Petitioner's argument overlooks the variables that go into bullet trajectory determination. This misses the point – experts did not testify that the trajectory was wrong – they explained that given all of the variables, it is not possible to know who the shooter was – nor was it possible to know then. (See PCAB, E. FALSE EVIDENCE #5, p 54, ln 6 – 24) Petitioner met his burden by showing that a dispute regarding the victim's height and analyzing other existing factors cited by Tovar and Gibson would have changed the outcome by raising reasonable doubt.

D. Billy Brown Recant

(RCAB p 11, ln 13 *et seq*) Regarding the recant, it is not in evidence, and therefore not relevant, so we do not discuss it. However, at the EH, Petitioner called a pathologist and ballistics expert to explain how they would have been able to counter Billy Brown's testimony about how the shooting occurred. Respondent's theory about why recant was not followed up on was speculative, and not supported by anything in the record. The Billy Brown recant process also goes to show that there were things that appellate counsel could have followed up, including to determine whether the recant was 'frivolous' but did not. Respondent did not call post-conviction counsel to testify support their position. Respondent brought no evidence into the record to show that Goodwin was effective. Clark testified that a police practices expert would have been helpful in preparing Petitioner's trial attorney. (p 90, ln 4 – 8)

E. Perjury and False Evidence

(RCAB p 14, ln 1 – 10) Respondent alleges that Petitioner failed to meet his burden regarding perjury and false evidence but they don't point to anything specific that shows that the evidence was truthful.

IV. NEW EVIDENCE (PCAB SECTION VIII)

In discussing new evidence, Respondent again cites incorrect statutory law. (See RCAB, p 5, ln 17 – 20 and p 5, ln 21 – 23) The correct statute is: 1473(b)(1)(C)(i) and (ii):

> (i) New evidence exists that is presented without substantial delay, is admissible, and is sufficiently material and credible that it more likely than not would have changed the outcome of the case.
>
> (ii) For purposes of this section, "new evidence" means evidence that has not previously been presented and heard at trial and has been discovered after trial. [Emphasis added for clarity.]

Respondent states that Petitioner failed to meet his burden; however, they apply incorrect law. The new standard is whether it would have changed the outcome of the case (not trial) (See PCAB, VIII, New Evidence, p 58 *et seq*.)

A. Meras Reports

Respondent concedes that the Meras report not turned over until after T2 – see Return (p 50, ln 22-24). Therefore, it is new evidence. Petitioner's counsel having the Meras reports would have made a difference in the outcome because it would have alerted counsel that the prosecution's one gun theory was false. (See PCAB, p 63, ln 2 – 9) The Meras report could not have been discovered prior to trial because it was withheld by the prosecution until 2017, some 34 years after the second trial.

(RCAB, p 6, ln 10 – 12) Respondent states that Petitioner's many of Petitioner's arguments are cumulative – but don't point to specific examples. However, they again apply the wrong test for new evidence. Cumulative is no longer a part of the test for new evidence. See Penal Code section

1473(C)(i) and (C)(ii), supra. Further, for example, evidence regarding victim's height is not cumulative. (See PCAB, p 48, ln 3 – 24)

B. Meras Shell Casings

(RCAB p 9, ln 7 – 14) Without citing any evidence, Respondent states that the Meras robbery occurred close in time to the Graybeal murder. In RCAB, they acknowledge the existence of .22 casings.[10]As testified to by Petitioner's experts, the law enforcement casing comparison was unnecessary. The fact that it was done raises questions about why it was done because the difference between .22s and .25s casings are visually determinable. Respondent states that the casings went back into law enforcement storage - no evidence.[11] Further, Petitioner was charged with the Meras crimes initially and the prosecution argued at the Preliminary Hearing (and the penalty phase) that he committed the Meras crimes. They did so even though they knew the facts: the casings from the Graybeal and Meras weapons didn't match and Meras didn't pick out Petitioner.

RCAB misstates the facts – the bullets weren't the same. Petitioner's prior attorneys didn't know because, as conceded by the prosecution, the Meras .22 report was not discovered and was withheld by the prosecution. In their RCAB, the prosecution forgets to mention that they moved forward with charging and preliminary hearing, despite the known facts. Petitioner's experts testified that is easy to visually see the difference between .22 and .25 casings; and the necessity of keeping evidence from the two cases separate.

DDA Ardaiz said that Petitioner committed the Meras crimes, with same gun/same caliber, even though he knew otherwise. DDA Robinson followed the same trial game plan as DDA

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[10] The existence of the .22 casings leaves open the lingering question of what caliber weapon killed the victim. See PCAB, VII. B. FALSE EVIDENCE #2 – the victim was killed with a .25 caliber firearm.

[11] The .22 casings are a missing piece of evidence in this case. Query: if they were returned to law enforcement storage, where are they now? Other than the Meras report which refers to their existence, the physical casings have never been discovered.

Ardaiz. (PCAB p 72, ln 19 – p 73, ln 5) The prosecution's argument supports our misconduct claim because although the district attorney's office knew that there were two guns involved, a .22 and a .25, they used their one-gun theory in the penalty phase.

After he was found guilty in his first trial, Petitioner wrote a letter to the DA's office asking to be brought to trial on the Meras charge because he wanted to prove his innocence. (See Habeas Exhibit 7j)[12] His due process rights were violated because he was unable to prove his innocence. These facts show that Petitioner didn't do either the Meras or Graybeal crimes. If he had been brought to trial on the Meras charges, the existence of the .22 casings would have been exposed. The knowledge of the .22 casings as early as 1979, would have made the defense able to further question the gun evidence at his second trial.

C. Fresno law enforcement refusal to test the weapon

(RCAB p 9, ln 15 – 17) Respondent states that law enforcement refused to test the weapon and casings. Based on the testimony of Koop, Isaac and Peterson, we don't know what happened. (See PCAB p 76, ln 22 *et seq*)

D. Mishandled Evidence

(RCAB p 9, ln 20 – 21) Regarding the court exhibit transported to FACL, respondent stated that an item fell out the of box and Isaac put it back in. However, Isaac testified that 'when she got to Hayward, I opened the box and there was a loose round, which I thought came out of an envelope, so I placed it back into the envelope that I thought that it came out of'. (p 533, ln 3 – 6) This meant that the evidence was in disarray, 'so then I had to get on the phone with Chris Coleman from Hayward and figured out what had happened to it, and I had placed it in the envelope, so it was there, just wasn't loose in the box anymore'. (p 533, ln 8 – 11) This supports Petitioner's argument that the court exhibits were stored in an unsecure manner and their integrity is compromised. (See

[12] Stankewitz Letter to Fresno Superior Court, dated 8-29-1979, addressed to William Smith, Fresno DA.

PCAB, VIII. F. New Evidence at 60)

E. Victim's Height

(RCAB p 10, ln 21) Respondent states that Petitioner asserts that discrepancy in the victim's height is new evidence. That's because the jury never heard testimony regarding the victim's actual height of 5'3". They only heard that she was 5'7", which was incorrect.

V. INTEGRITY OF EVIDENCE (PCAB Sections VIII. B – D., F – G, L & O)[13]

(RCAB p 10, ln 1 – 2) Respondent discusses the integrity of the evidence from 1978, calling it a 'simple mix-up'. However, when it comes to evidence, a simple mix-up is unacceptable. As explained at length in PCAB, Section VIII. New Evidence, the many instances of conflicting law enforcement reports from the initial investigation show that the evidence was compromised and contaminated. Proper evidence custody requires that evidence not be compromised or contaminated.

VI. REVERSIBLE ERROR

(RCAB p 14, ln 13 *et seq*) Respondent states that error must be fundamental and effecting the structural integrity of the trial in order to be reversible error. Petitioner has shown that there are many fundamental errors that effected the structural integrity of the trial. (See PCAB in its entirety)

(RCAB p 15, ln 5 – 14) Respondent states that no reversible error proven. To support their position, they state "The etchings on the holster remain unknown and are irrelevant." Although it is only one example cited, this is a typical misstatement by the prosecution. Petitioner explained this thoroughly in his PCAB at 35.

Petitioner rests on his prior arguments contained in his PCAB regarding the many errors that occurred in this case.

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[13] Query: If the prosecution, including evidence handling and discovery was done properly, why did DDA Ardaiz arrange to see the case file? If it was proper to do so, why didn't the DA disclose that he did? See HE 23.

VII. CONCLUSION

Ask the court to find that Petitioner met his burden and grant habeas relief, specifically either to dismiss the case entirely or grant a new trial. In the alternative, Petitioner agrees with respondent that he should be resentenced forthwith. If this Court decides resentencing is more appropriate, Mr. Stankewitz respectfully requests he be resentenced to time served at this Court's earliest availability. Mr. Stankewitz is prepared to demonstrate he is eligible to be resentenced to time served and released from the custody of CDCR immediately for the following reasons for which he can provide additional documentation:

1. *In re Wilson*[14] where the court, citing *In re Palmer* (2021) 10 Cal.5th 959, 966-967, held that based on the CA Constitution, the totality of Wilson's more than 49 year sentence for a murder conviction had to be classified as constitutionally excessive, especially knowing that murderers generally served less than 20 years before getting parole. The court in *Wilson* ordered his parole ended immediately.

2. He has already served over 46 years – Mr. Stankewitz began serving time on February 8, 1978.

3. Based on his CDCR records, he has been a model prisoner for the last 20 years. This is explained in his previously filed Motions for Release on OR or Bail, for which the most recent written motion was filed with this Court on October 28, 2022.

Dated: May 8, 2024

Respectfully Submitted,

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Attorneys for Defendant
DOUGLAS RAY STANKEWITZ

By CURTIS L. BRIGGS

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[14] In re Wilson (CA1, Div. 2 2021), 2021 Cal.App.Unpub LEXIS 5016)

PROOF OF SERVICE

The undersigned declares:

I am a citizen of the United States. My business address is P. O. Box 7225, Cotati, CA 94931. I am over the age of eighteen years and not a party to the within action.

On the date set forth below, I caused a true copy of the within PETITIONER'S EVIDENTIARY HEARING REBUTTAL BRIEF to be served on the following parties in the following manner: Mail _x___ Overnight mail ____ Personal service ____ Fax ____ Email xx_to the address shown below

Earon@Fresnocountyca.gov
Office of District Attorney
Fresno, CA 93721

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration is executed on May 8, 2024, at Sebastopol, California.

Alexandra Cock