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*THE SUPERIOR COURT OF NEW JERSEY  
APPELLATE DIVISION*

DOCKET NO. A-1648-24

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STATE OF NEW JERSEY,	:	
	:	<u>CRIMINAL ACTION</u>
Plaintiff-Respondent,	:	
	:	One Appeal from a Final Judgement
v.	:	of Conviction of the Superior
	:	Court, Law Division,
HELEN FORD,	:	Somerset County
	:	
	:	Sat Below:
Defendant-Appellant	:	Hon. Robert G. Wilson, J.S.C.
	:	

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BRIEF ON BEHALF OF THE STATE OF NEW JERSEY

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COUNTER-STATEMENT OF PROCEDURAL HISTORY

The State adopts Defendant's recitation of this case's procedural history.

(Db1)<sup>1</sup>

COUNTER-STATEMENT OF FACTS

On April 27, 2023, Ms. Ford was charged with Driving Under the Influence in violation of N.J.S.A. 39:4-50 and Failure to Maintain Lane in violation of N.J.S.A. 39:4-88. (1T:20-23 to 24). On April 11, 2024, the Honorable Francesco Taddeo, J.M.C., presided over the Defendant's trial in Watchung Borough Municipal Court. (1T). During trial, the Municipal Court Prosecutor called New Jersey State Trooper Marchut as the State's first witness. (1T:5-4). Trooper Marchut testified that on April 24, 2023, while patrolling Route 78 eastbound, he received communications from dispatch that a black Cadillac with a blond female driver was driving erratically and hit the divider on the roadway. (1T:6-13 to 7-19). Prior defense counsel objected and questioned the probable cause for the stop on Defendant's vehicle. (1T:7-20 to 8-7). A conversation between the Municipal Court Prosecutor, Judge Taddeo, and prior defense counsel ensued about the anonymous 9-1-1 calls being admitted into evidence. (1T:8-17 to 10-1). Prior defense counsel then requested a motion to suppress the motor vehicle stop. *Ibid.* Judge Taddeo then limited defense' counsel's questioning to the issue of whether there was probable cause to pull the Defendant's vehicle over. (1T:10-2 to 5).

The Municipal Court Prosecutor continued his questioning of Trooper Marchut, who testified that after he received the communication about the erratic driver, he positioned himself "in the 42 cut" and stood by to see if he could see the vehicle. (1T:10-24 to 11-5). After maybe a minute or two, Trooper Marchut

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<sup>1</sup> The State adopts the Defendant's citations conventions. (Db 2, n. 2).

observed a black Cadillac with a blonde female driver in the right lane. (1T:11-12 to 14). Trooper Marchut then pulled out of the cut, and observed the black Cadillac touch the dashed line between the middle and right lane. (1T:11-15 to 17). After viewing the violation and observing that the vehicle matched the description given by dispatch, Trooper Marchut stopped the vehicle to see if the driver was okay. (1T:11-17 to 20).

It was at this time Trooper Marchut's body worn camera ("BWC") was shown to the Court. (1T:12-20). The video shows Trooper Marchut pulling over the Defendant, her handing him her credentials, making a phone call to his supervisor, and ultimately asking her out of the vehicle to perform field sobriety tests. (Trooper Marchut BWC at 0:00:34 to 0:08:35). Before the Defendant steps out of her vehicle, Trooper Marchut does ask her if she has had anything to drink and she replied that she had two glasses of wine. (1T:15-9 to 14). As the Defendant was getting out of the vehicle she stumbled, swayed to her right side, and put her hand on the car for balance. (1T:90-5 to 9). During the administration of the field sobriety tests, you can see on Trooper Marchut's BWC that Defendant performs horribly. (Trooper Marchut BWC at 0:09:18). During the walk and turn test she walks forward 9 spaces and instead of following the Troopers instructions (which were to walk 9 spaces, turn around with a series of small steps, and walk back 9 spaces), Defendant walks backward 9 spaces. Id. at 0:11:54 to 0:13:49. Defendant was also once again holding the car for balance, started the tests multiple times before being told to do so by the Trooper, and stated she was confused by the Trooper instructions. (1T:90-21 to 91-4). While performing the one-legged stand, Defendant barely keeps her balance, putting her foot down between each number she counts. Id. at 0:15:25 to 0:16:40. The Trooper also had to remind the Defendant multiple times to look at her right foot, which she does not do. Ibid.

Lastly, Trooper Marchut asks Defendant to count backwards starting at 69 and ending at 54. Id. at 0:16:52. Defendant, struggling to count backwards, stops at 61. Id. at 0:17:05. The Trooper then reminds her she was supposed to stop at 54, to which she then begins counting backwards from 54 to 46, but again messes up and says number 45 before 46. Id. at 0:17:07 to 0:17:20. During this entire test, she is very visibly struggling to remember which number comes next. Ibid. It was at this point Defendant was placed under arrest for Driving While Intoxicated. (1T:20-23 to 24). Defendant was placed in the back of Trooper Marchut's patrol vehicle, and a probable cause search of the vehicle was conducted. (1T:23-10 to 16).

Trooper Marchut testified that while transporting the Defendant to the station, he detected the odor of alcohol and believed it was coming from the Defendant, as the odor was not there previously. (1T:23-24 to 24-6). The Trooper further testified that during the HGN test he noted the Defendant had bloodshot and watery eyes; he also noted that Defendant, during the HGN test, received 4 out of 6 hits which indicated to him there was an 80% chance her BAC level was over .08% (the legal limit in New Jersey). (1T:24-12 to 21). It should be noted that Judge Taddeo did not use the HGN test to prove the Defendant's guilt, it was only used to show there was probable cause for the arrest. (1T:102-6 to 13). It was also elicited at trial that the Defendant was coming home from a casino and that she had been drinking wine. (1T:25-3 to 7). At the end of the direct examination, Trooper Marchut made the conclusion that the Defendant was driving under the influence. (1T:25-23 to 24).

During a lengthy cross-examination, prior defense counsel questioned Trooper Marchut if he had noticed damage to the Defendant's car. (1T:29-12 to 30-25). He also crossed Trooper Marchut on whether Defendant crossed over the lane, or if she had only touched the line before she was pulled over. Ibid. It was further testified that while Trooper Marchut did not see damage to the vehicle, he still

believed that this was the reported vehicle and perhaps the vehicle did not hit the divider as stated in the original report. (1T:35-3 to 6). After this portion of prior defense counsel's cross-examination, Judge Taddeo ruled that there was probable cause for Trooper Marchut to stop Defendant's vehicle as she was a blonde female driving a black Cadillac like the report stated. (1T:42-20 to 25). He further found that due to the anonymous tip received, and this Defendant's vehicle touching the white line, the Trooper was acting as a community caretaker by stopping the vehicle to ensure the driver was not in danger. (1T:44-1 to 9). After this determination, the motion to suppress was completed and the Municipal Court Prosecutor continued with direct examination of Trooper Marchut. (1T:47-20).

Trooper Marchut testified that he brought the Defendant back to the Somerville Barracks and began the 20-minute observation period prior to the alcotest. (1T:47-21 to 49-11). The Trooper reported that he did not see anything that would have interrupted the 20-minute observation period. (1T:54-6 to 13). During cross-examination, prior defense counsel elicited that while the Trooper did not see anything that would interrupt the observation, he could not be 100% certain that she did not burp or bring her hands to her mouth. (1T:59-2 to 60-21). Further the Trooper stated that he did not do a sweep of the room for electronics, nor did he check her mouth for gum or anything else. Ibid. After cross-examination was through, there was a discussion about the 20-minute observation, in which it became apparent that Judge Taddeo found that the State did not satisfy that requirement for a per se DWI trial. (1T:72-1 to 25).

The State then called New Jersey State Trooper Martin as their second witness. (1T:73-25). Trooper Martin testified that when he arrived at the traffic stop, he observed the smell of alcohol coming from the Defendant, and witnessed the Defendant perform poorly on the field sobriety tests. (1T:75-25 to 77-23). At the end

of direct examination Trooper Martin, based on the odor alcohol and the field sobriety tests, determined the Defendant was under the influence. Ibid. During cross-examination prior defense counsel elicited from Trooper Martin that the Defendant's BAC level was at 0.8% and while it was not high, she was still over the legal limit. (1T:80-20 to 81-24). The Court at that point stopped prior defense counsel and asked why he was producing testimony about the BAC level when the State never produced evidence about the alcotest reading. (T:82-6 to 9). The Court further stated that at this point it was an observation trial and asking questions about the BAC level will not assist him with making a decision. (1T:83-6 to 84-4). Prior defense counsel then ended his cross-examination. (1T:84-19 to 20). After a brief redirect, the State rested their case. (1T:85-12 to 86-5). Judge Taddeo then asked if Defense has any witnesses to which prior counsel responded "of course." (1T:86-10 to 11). The Court took a short break and when it resumed prior defense counsel stated he did not have any witnesses and "this is over." (1T:86-12 to 21).

After a short summation from prior defense counsel, Judge Taddeo gave an oral decision and found the Defendant guilty of driving while intoxicated. (1T:86-24 to 102-8). Judge Taddeo based his decision on Trooper Marchut's BWC that showed the Defendant unsteady on her feet, her bloodshot and watery eyes, and the amount of time she incorrectly performed the field sobriety tests. (1T:100-23 to 102-5). After his oral decision, Judge Taddeo sentenced the Defendant to fines and fees, her license was suspended until an interlock device was installed in her vehicle, she was to have the interlock device installed for 3 months, and she was to complete 12 hours at the Intoxicated Driver Resource Center ("IDRC"). (1T:104-10 to 105-15). Defendant was also found guilty of failing to maintain her lane and was sentenced to fines and fees. Ibid. Defendant was notified of her 20-day appeal rights. (1T:105-10 to 14).

After her conviction in Municipal Court, Defendant appealed to the Law Division and on October 30, 2024, the Law Division held a trial de novo. (T2). Before the Court was a single issue: whether the Defendant was denied any of her constitutional rights. After oral arguments, the Honorable Robert G. Wilson, J.S.C., reserved his decision. (2T:38-8 to 9). On December 23, 2024, Judge Wilson rendered an oral opinion and found the Defendant guilty of Driving Under the Influence as well as her other motor vehicle violation for failing to maintain her lane. (3T:24-12 to 16). Judge Wilson then sentenced the Defendant to the same penalties imposed by the lower court. (3T:24-20 to 23). Defendant has now appealed her conviction in the Law Division, and the State's response follows.

## **LEGAL ARGUMENT**

### **POINT I**

#### **DEFENDANT WAS NOT DENIED ANY OF HER CONSTITUTIONAL RIGHTS**

Defendant argues that because the trial court never addressed her and never advised her of her constitutional right to or not to testify, she was denied her constitutional rights. (Db 24).

On appealed from a Municipal Court to the Law Division, the review is de novo on the record. R. 3:23-8(a). The Law Division judge must make independent findings of facts and conclusions of law based upon the evidentiary record of the Municipal Court and must give due regard to the opportunity of the Municipal Court judge to assess the credibility of witnesses. State v. Johnson, 42 N.J. 146, 157 (1964). On appeal from a Law Division decision, the issue is whether there is “sufficient credible evidence present in the record” to uphold the findings of the Law Division. Id. at 162. The Appellate Division “do[es] not weigh the evidence, assess the credibility of witnesses, or make conclusions about the evidence.” State v. Barone,

147 N.J. 599, 615 (1997).

The reviewing court must “give deference to those findings of the trial judge which are substantially influenced by his opportunity to hear and see the witnesses and to have the ‘feel’ of the case.” State v. Locurto, 157 N.J. 463, 471 (1999); State v. Cerefice, 335 N.J. Super. 34, 383 (App. Div, 2000). “Deference is especially appropriate ‘when the evidence is largely testimonial and involves questions of credibility.’” Cesare v. Cesare, 154 N.J. 394, 412 (1998) (citing In re Return of Weapons to J.W.D., 149 N.J. 108, 117 (1997)). Moreover, “under the two-court rule,” only “a very obvious and exceptional showing of error” will support setting aside “concurrent findings of facts and credibility determinations made by” the Law Division and the Municipal Court. Locurto, 157 N.J. at 474.

In Rock v. Arkansas, 483 U.S. 44. (1987), the United States Supreme Court explicitly recognized the constitutional right to testify, finding its roots firmly established in several provisions of the federal constitution. The Court explained that the right emanated from the fourteenth amendment: “It is on the rights that [is] ‘essential to due process of law in a fair and adversarial process.’” Id. at 54, (citing Faretta v. California, 422 U.S. 806, 819 n. 15, (1975)). “The right to testify is also Compulsory Process Clause of the Sixth Amendment, which grants a defendant the right to call ‘witnesses in his favor.’” Id. at 483 U.S. at 52. The Court explained that a defendant’s right to call witnesses of his own behalf “logically include[s]” the right to testify. Ibid.

The right to testify in New Jersey is guaranteed by statute N.J.S.A. 2A:81-8. Early courts in New Jersey, however, also viewed it as a “civil right,” protected under fourteenth amendment to the federal constitution:

It may be suggested that the civil rights protected by this clause of the constitution are only those which were recognized when the

constitution was framed, and that, therefore, the right of the litigant to be a witness from himself having been created since that time, it is not among those this secured. But it would, I think, be unreasonably cramping this provision thus to confine it.

Percy v. Powers, 51 N.J.L. 432, 435, (Sup. Ct. 1859).

In State v. Bogus, 223 N.J. Super. 409, (App. Div. 1989), the Appellate Division held that when a defendant is represented by counsel, the trial court does not have a duty to advise the defendant of his or her right not to testify or to explain the consequences that the testimony may produce. Id. at 426. The court reasoned that the decision to testify is a strategic choice, and it is therefore the duty of counsel, not the trial court, to advise a defendant whether to testify. Id. at 223 N.J. Super. at 423-24. “We hold that when a defendant is represented by counsel, the trial court is not required to inform defendant of his right to testify or explain the consequences of that choice.” State v. Savage, 120 N.J. 594, 630 (1990). In Siciliano v. Vose, the court succinctly stated:

To require the trial court to follow special procedure, explicitly telling defendant about, and securing an explicit waive of, a privilege to testify ... could inappropriately influence the defendant to waive his constitutional right not to testify, thus threatening the exercise of this other, converse, constitutionally explicitly, and more fragile right. 834 F.2d 29, 30 (1st Cir. 1987) (emphasis in original).

“We find that it is the responsibility of a defendant’s counsel, not the trial court to advise defendant of whether or not to testify and to explain the tactical advantages and disadvantages of doing so or not doing so.” Savage,

120 N.J. at 630 (citing State v. Bogus, 223 N.J. Super. at 423) (emphasis added). Counsel's reasonability includes advising a defendant of the benefits inherent in exercising that right and the consequences inherent in waiving it. Id. at 631. Thus, if a defendant's counsel fails to inform him of certain rights, the Defendant may be able to assert an ineffective assistance of counsel claim. State v. Bey, 161 N.J. 233, 271 (1999).

Defendant argues that because no one in the Municipal Court advised her that she had a constitutional right to testify in her own defense, or concomitantly, exercise her right to remain silent, that she was denied her constitutional rights. (Db 24). This is not correct. As shown in Bogus, the trial court does not have a duty to advise the Defendant of her constitutional right to testify or not to testify. It is up to Defendant's trial counsel to provide Defendant with that information. In the instant case, Defendant did not take the witness stand. Defendant does not make the argument that if she had taken the stand that it would have tipped the scales of justice towards an acquittal; only that no one advised her of her right to or not to testify.

In her certification, Defendant contends that her trial counsel never had a conversation with her about whether she would or would not testify on her own behalf. (Da7). It should be noted that Defendant states that there was no conversation about whether she would testify, not that prior counsel never

advised her of her rights. Ibid. Moreover, the record plainly shows that Defendant at one point planned to put on a defense with witnesses but after the break thought better of it. (1T:86-10-21). A conversation clearly had occurred regarding testimony at trial. Nevertheless, the argument of whether prior counsel advised the Defendant of her right to or not to testify is better suited for a Post-Conviction Relief application and not a direct appeal of her trial.

Defendant also makes an argument that she was never advised of her rights because the recorded video of the Honorable Louis J. Belasco, J.M.C., was not played prior to her trial. (Db25-26). This video is utilized by the Municipal Courts to advise Defendants of their rights. The video is typically shown during a Defendant's first appearance on their charges. Considering that this Defendant went to trial, it can be assumed that she had a first appearance and was shown the video. Additionally, once again, it is defense counsel's duty to advise the Defendant of their rights.

**POINT II**  
**DEFENDANT WAS NOT DENIED HER DUE PROCESS RIGHTS  
REGARDING THE TRIAL COURT HEARING AN UNFILED  
MOTION TO SUPPRESS DURING TRIAL**

Defendant argues that because the trial court "made up procedure" and heard and ad hoc, unfiled motion to suppress after trial had already begun, it deprived the defendant of her due process rights. (Db21-23).

The State does not disagree with Defendant that the proper procedure to file a motion to suppress was not followed here; but it should be noted that it was prior defense counsel who asked for the suppression hearing at the start of trial. (1T:8 to 10-17 to 10). Frankly, the Court and the prosecutor did the defendant a favor by allowing the suppression hearing to move forward. Further, prior defense counsel consented to the impromptu suppression hearing being part of the trial record. Ibid. And, Defendant has not enlightened this Court as to what would have been different about the motion had it been noticed sooner.

Defendant also contends that it was improper for Judge Taddeo to “limit” prior defense counsels’ cross-examination during the motion to suppress. (Db22). Judge Taddeo limited prior defense counsel’s questioning to the issue of probable cause to pull the vehicle over, but regardless, defense counsel was later allowed to engage in a lengthy cross-examination with Trooper Marchut and again with Trooper Martin. (1T:58-15). Cross-Examination was only briefly limited for the purposes of the suppression hearing.

**POINT III**  
**THE HORIZONTAL GAZE NYSTAGMUS (HGN) TEST IS**  
**ADMISSABLE TO SHOW PROBABLE CAUSE**

Defendant argues that the “improper” admittance of the HGN evidence

is a direct violation of State v. Doriguzzi, 334 N.J. Super 530 (App. Div. 2000). (Db6-7).

The Horizontal Gaze Nystagmus (“HGN”) is used to determine a motorist’s consumption of alcohol or drugs. State v. Doriguzzi, 334 N.J. Super. 530, 538 (App. Div. 2000). “While we have held that HGN testing is not admissible to ‘prove defendant’s guilt of driving under the influence of alcohol,’ we noted ‘the clear majority of jurisdictions that have considered HGN testing allow its admission into evidence for one or more purposes...or they admit HGN testing for the limited purpose of establishing probable cause to arrest or to perhaps only to corroborate chemical sobriety tests.’” Id. at 540.

Defense counsel is correct that the HGN test cannot be used as evidence of intoxication, but they are incorrect in stating that it is entirely inadmissible. An HGN test is admissible when it is used to show, in conjunction with the totality of the circumstances, there was probable cause to arrest someone for DWI. Doriguzzi, 334 N.J. Super at 540. Here, the HGN test was used to show there was probable cause to arrest the Defendant for DWI, it was not used to prove her guilt. During his findings, Judge Taddeo found the Defendant had been driving while intoxicated. (1T:102-6 to 13). During his decision, Judge Taddeo outlined the entire motor vehicle stop and did state that the HGN test “is obviously under Doriguzzi for probable cause purposes.” (1T:90-14 to 19).

Even without the HGN test Judge Taddeo pointed to multiple instances in the body worn camera footage where it was clear the Defendant was intoxicated. He stated that the defendant stumbled out of the car, swayed to her right side, and put her hand on the car for balance. (1T:90-5 to 9). On the heel to toe test, she again held on to car for balance again, she started the test multiple times before being told to do so by the Trooper, she stated she was confused by the Troopers instructions, and there was no heel to toe steps in any part of the test. (1T:90-21 to 91-4).

Judge Taddeo further outlined all of the tests the Defendant took on the side of the road, and concluded that she was not following directions, she had done multiple things incorrectly, she had admitted to drinking wine prior to driving and overall was under the influence of alcohol. (1T:91-9 to 92-14). There was clearly enough evidence without the HGN test to persuade Judge Taddeo that the Defendant was guilty of DWI.

**POINT VI**  
**DEFENDANT WAS NOT DENIED ANY OF HER**  
**CONSTITUTIONAL RIGHTS BECAUSE HER TRIAL TURNED**  
**FROM A PER SE DWI TRIAL TO AN OBSERVATION TRIAL**

Defendant takes issue with how the trial “somehow” became an observational trial. (Db19). During testimony, it was prior defense counsel who showed on the record that Trooper Marchut did not properly observe the Defendant for the required 20-minute observation period before the alcotest

was administered. (1T:86-24 to 84-7). While the State agrees it was not explicitly stated on the record that it was no longer a per se DWI trial, the Court made it clear that he was going to rule that there was not a proper 20-minute observation period, making the alcotest reading inadmissible. (1T:83-6 to 11). Now it should be noted that Defendant's BAC level was testified to, but it was prior defense counsel who introduced that testimony from Trooper Martin. (1T:80-23 to 25). Judge Taddeo expressly stated he would not consider the BAC regardless. (1I:99-11 to 16). Throwing out the BAC was only beneficial to the Defendant as it showed a low level of intoxication.

A large part of Defendant's appeal is based on mistakes they believe prior counsel made. Throughout her entire brief, it appears she is in disagreement, after the fact, with Defense counsel's strategy. This is not a Post-Conviction Relief application, and any arguments Defendant makes regarding prior defense counsel's performance are not appropriate. Further, the arguments are so weak that even if this was a PCR none of those arguments would prevail because the outcome of trial would remain unchanged. Strickland v. Washington, 466 U.S. 668 (1984).

Given the above, there has clearly been no showing by the Defendant that there is a "very obvious and exceptional" showing of error that supports setting aside the first and second Court's concurring findings of facts, as laid

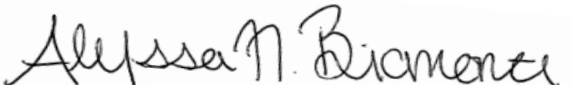
out in Locurto, 157 N.J. at 474.

**CONCLUSION**

For the foregoing reasons, the Defendant's constitutional rights were not violated and her conviction for Driving Under the Influence should be affirmed.

Respectfully submitted,

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