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Angeles County pursuant to Welfare and Institutions Code sections 6608 and 6608.5.

(2) Enter a new order finding Real Party in Interest Hubbart's domicile to be the county where he resided prior to his incarceration, Santa Clara County, as specified in Welfare and Institutions Code section 6608.5, subdivision (a).

Until a determination on the merits of this writ petition, or until further order of this Court, the District Attorney of Los Angeles County also seeks from this Court **an IMMEDIATE STAY OF THE CONDITIONAL RELEASE of Christopher Hubbart** from Coalinga State Hospital.<sup>1</sup>

Los Angeles County District Attorney Jackie Lacey (hereafter sometimes LADA), seek a writ of mandate to overturn the order of respondent, Santa Clara Superior Court, finding that the domicile of Real Party in Interest, Christopher Hubbart (hereafter Hubbart), is Los Angeles County, and granting Hubbart's petition for conditional release to Los Angeles County, pursuant to Welfare and Institutions Code<sup>2</sup> section 6608. It is presented by this verified petition that:

## I

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1. The next court date in this matter was set, by the agreement of all parties, for Friday, July 12th, 2013, before The Honorable Judge Gilbert T. Brown, of the Santa Clara County Superior Court, for the purpose of assessing the progress of Liberty Healthcare Corporation in locating appropriate housing for Petitioner. Liberty Healthcare Corporation is the Agency that contracts with the Department of State Hospitals to manage the forensic conditional release program to house, supervise and treat Mr. Hubbart.

2. Unless otherwise indicated, all statutory references are to the Welfare and Institutions Code.

The People affirmatively allege that the following was established for the trial court: The subject of the original petition in this matter, Christopher Hubbart (hereafter Hubbart ), was born in Pasadena, California in 1951. He lived in Pasadena from 1951 until 1957. (Declaration of Karen Thorp, attached as Petitioner's Exhibit A., p.1.) Hubbart then lived in Claremont, California from 1957 until 1972. (*Ibid.*) Between 1968 and 1972, Hubbart committed numerous rapes in Los Angeles and San Bernardino counties. In November of 1972, Hubbart was arrested as he ran away from his last Los Angeles victim. (*Ibid.*)

## II

It was further established at the hearing and before the court that in July of 1973, Hubbart was indicted by a Los Angeles County Grand Jury on 21 counts. Hubbart pled guilty to one count of burglary, one count of rape and three counts of sodomy. As a result, Hubbart was committed to Atascadero State Hospital as a Mentally Disordered Sex Offender for nine years. His release date was set for October 30, 1981. In November of 1979, Hubbart was released early to Santa Clara County on outpatient status as an MDSO. (Exhibit A, p.1.) He committed rapes, sodomy and forcible oral copulation in San Francisco, Sunnyvale and Santa Clara of more than 23 victims at the rate of over 2 victims a month until November 1981. During that time, Hubbart lived in Sunnyvale, which is in Santa Clara county (Exhibit A, pp. 1-2) In November of 1981, Hubbart's probation was revoked because Hubbart was afraid he "was losing control" and he was returned to Atascadero State Hospital in San Luis Obispo County. In March of 1982 Hubbart was arrested at the State Hospital for a rape which had occurred in Sunnyvale, in addition to 22 other rapes which occurred in Santa Clara County. (*Id.* at p. 2.) In August of 1982, Hubbart was

sentenced to 16 years in state prison for offenses committed in Santa Clara County. (*Ibid.*) In April of 1990, Hubbard was paroled in Santa Clara County after serving 7 years 8 months. (*Ibid.*) Hubbard was working from April of 1990 until June of 1990 at Fuji Optical Systems in Los Gatos, in Santa Clara County and was living in Los Gatos<sup>3</sup>. (Parole Adjustment hereafter (Exhibit F.))

### III

The People affirmatively allege that the following was established below: In June of 1990, less than two months after his release, Hubbard stalked and assaulted two more victims (including his 51<sup>st</sup> victim) in San Jose (also in Santa Clara County) (Exhibit A, p.2.) Hubbard was sentenced to 5 years in State Prison for these offenses in August of 1990. In January of 1993, Hubbard was supervised by San Bernardino County on parole while he lived in Claremont. Within two months, his supervision by San Bernardino County ended since he felt he was losing control. (*Ibid.*; Exhibit B (Los Angeles County District Attorney Investigation Report, hereafter Exhibit B, pp. 9, 61.)

### IV

The People affirmatively allege that the record before the trial court established the following: From 1994 until 1995, Hubbard was determined to be a Mentally Disordered Sex Offender (hereafter MDSO). In January of 1996, he was returned to Santa Clara County for proceedings under the newly enacted Sexually Violent Predator Law. From January of 1996 until 2013, Hubbard was treated as an SVP. (Exhibit A, p. 2.)

### V

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3. The People will supply transcripts of hearings in April and May



Hubbart filed a Petition for Conditional Release pursuant to Welfare and Institutions Code section 6608 in Santa Clara County. (Order for Conditional Release, hereafter Exhibit C, p. 1.) The People were represented at the hearings on April 19, 26 and May 3, 2013 by a Deputy District Attorney from Santa Clara County. On April 19 and 26, the issue of Conditional Release for Hubbart was litigated. (Minute Order Dated April 26, 2013 (hereafter Exhibit D); Minute Order Dated May 3, 2013 (hereafter Exhibit E); Exhibit C.) On May 3, 2013, the domicile issue was litigated and Los Angeles County Deputy District Attorney Karen Thorp was present. (Exhibit E; Exhibit C.) The trial court decided that the domicile was Los Angeles County based on Hubbart's recently stated preference and his last residence was in Los Angeles County. (Exhibits C, A, p.3.)

## VI

Section 6608.5, provides as follows:

(a) A person who is conditionally released pursuant to this article shall be placed in the county of the domicile of the person *prior to the person's incarceration*, unless the court finds that *extraordinary circumstances* require placement outside the county of domicile.

(b)(1) For the purposes of this section, "county of domicile" means the county where the person has his or her true, fixed, and permanent home and principal residence and to which he or she has manifested the intention of returning whenever he or she is absent. For the purposes of determining the county of domicile, the court may consider information found on a California driver's license, California identification card, recent rent or utility receipt, printed personalized checks or other recent banking documents showing that person's name and address, or information contained in an arrest record, probation officer's report, trial transcript, or other court

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(..continued)

of 2013 as soon as they are received.

document. If no information can be identified or verified, the county of domicile of the individual shall be considered to be the county in which the person was arrested for the crime for which he or she was last incarcerated in the state prison or from which he or she was last returned from parole.

(§ 6608.5.)

It is affirmatively alleged, that except for a brief two-month period when Hubbart was paroled to Los Angeles County, Hubbart's domicile from November 1979 to his incarceration in state prison in August 1982, was Santa Clara County.<sup>4</sup> In April 1990, Hubbart was paroled to Santa Clara County, where two months later, he stalked and assaulted two more victims in the city of San Jose, County of Santa Clara. He was again sentenced to state prison. On his release from parole this time in January 1993, he was paroled to San Bernardino County and lived in Los Angeles County. During this two-month parole period, Hubbart reported that he was losing control, and his parole was violated and he was returned to state prison. Prior to his scheduled release from state prison on parole, Santa Clara County initiated Sexually Violent Predator proceedings, pursuant to section 6601, et seq. The SVP commitment was initiated by Santa Clara County while he was in state prison for offenses that he committed in Santa Clara County, while domiciled in Santa Clara County.

## VII

It is affirmatively alleged, that respondent superior court erred as a matter of law when it failed to apply the standards for determining domicile as set forth in section 6608.5. Respondent superior court

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4. In fact, Hubbart was not paroled to Los Angeles County. He was placed on parole in San Bernardino County, and lived at his parent's residence for that brief two-month period.

disregarded evidence of the years of residency that Hubbard had established in Santa Clara County, the numerous crimes that Hubbard committed in Santa Clara County, and made its determination based solely upon the brief two-month period when Hubbard was paroled to San Bernadino County and lived in Los Angeles County. Respondent superior court disregarded the evidence that Hubbard's only remaining relatives do not live in Los Angeles County.

Respondent superior court erred as a matter of law when it failed to consider that portion of section 6608.5, which created a presumption that the individual's domicile to be "the county in which the person was arrested for the crime for which he or she was last incarcerated in the state prison" and instead based its determination solely upon that portion of section 6608.5 which allows consideration of the county "from which he or she was last returned from parole" (§ 6608.5), which was actually San Bernardino County, not Los Angeles County. Respondent superior court was not authorized to ignore that portion of the statute which considered domicile to be the county of arrest for the crimes for which he was incarcerated, especially in light of the fact that Hubbard's last two convictions were for crimes committed in Santa Clara County, he was paroled to Santa Clara before he was subsequently paroled and living in Los Angeles, and Santa Clara County initiated the SVP proceedings prior to his release from state prison from a Santa Clara County commitment to state prison.

### VIII

It is affirmatively alleged, that respondent superior court also abused its discretion in determining that Hubbard's domicile was Los Angeles County and that substantial evidence does not support this

determination. Except for a two-month period on parole when he lived in Los Angeles County, there has been no nexus between Hubbart and Los Angeles County since the crimes he last committed in Los Angeles County in 1972. After Hubbart's early release as an MDSO in November 1979, Hubbart committed rapes in San Francisco, the City of Sunnyvale in the County of Santa Clara. He was paroled to Santa Clara in April 1990, then committed new offenses in the city of San Jose, County of Santa Clara, in June 1990.

### IX

Respondent superior court has a clear, present and mandatory duty to vacate its ruling of May 10, 2013, ruling that Hubbart's domicile *prior* to his incarceration on charges that led to his eventual commitment as an SVP was Los Angeles County, or that the last county which returned Hubbart on parole was Los Angeles County.

### X

The District Attorney of Los Angeles County has a clear, present, and substantial right to the performance of respondent's duty, a beneficial interest therein, and is given a beneficial interest in the determination of domicile by section 6609.1, subdivision (a)(1).

### XI

The District Attorney of Los Angeles County has not previously sought extraordinary relief in this matter.

### XII

The attached Memorandum of Points and Authorities and Exhibits support this request for extraordinary relief and are incorporated by reference as if set forth in haec verba.

### XIII

Extraordinary writ is an appropriate remedy in challenging respondent superior court's ruling determining domicile because it erred as a matter of law in not applying the appropriate factors as delineated by statute, and made said determination with no substantial evidence to support its determination, and without intervention by this Court, Hubbart will be released into Los Angeles County, which has no nexus to the crimes for which he was committed to state prison and subsequently as a Sexually Violent Predator. The ruling has also generated intense public interest<sup>5</sup> and a swift determination of the merits of this petition is necessary.

### XIV

Good cause exists for a stay of the execution of the granting of the defendant's petition for conditional release until completion of these writ proceedings. Though Hubbart remains in Coalinga State Hospital until a community release program is arranged, it is unknown when such a plan will be arranged and when Hubbart will be released into the community of Los Angeles County.

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5. Los Angeles County Supervisor Michael Antonovich, has issued a press statement, that the conditional release of Hubbart to Los Angeles County will be discussed at the Board of Supervisor's July 9, 2013 meeting. (<http://antonovich.com/release-state-set-to-release-violent-mentally-ill-serial-rapist-to-los-angeles-county/>)

WHEREFORE, petitioner prays that:

(1) A writ of mandate be issued commanding respondent superior court to annul and vacate its ruling finding that Real Party in Interest's county of domicile is Los Angeles County, and its order granting conditional release of Hubbart to Los Angeles County.

(2) Enter a new different order finding Real Party in Interest's county of domicile to Santa Clara County, and to issue any order granting Real Party's conditional release to Santa Clara County.

(3) This Court order an **IMMEDIATE STAY OF THE CONDITIONAL RELEASE of Christopher Hubbart** from Coalinga State Hospital or any California State Hospital, until a final determination of this petition or further order of this Court.

(4) Petitioner be granted such other and further relief as this Court deems appropriate.

Respectfully submitted,

JACKIE LACEY  
District Attorney of  
Los Angeles County

By

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ROBERTA T. SCHWARTZ  
Deputy District Attorney  
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**VERIFICATION**

The allegations in the foregoing Petition for Writ of Mandate and Request for Immediate Stay are alleged as true under penalty of perjury by the undersigned public official, acting in the course and scope of her official capacity and based upon the accompanying copies of official court documents and sworn declarations.

Executed on July 9, 2013, at Los Angeles, California.



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ROBERTA T. SCHWARTZ  
Deputy District Attorney

**POINT AND AUTHORITIES IN SUPPORT  
OF THE PETITION FOR WRIT OF  
MANDATE**

**ARGUMENT**

**I**

**WHEN A COUNTY'S SUPERIOR COURT  
HAS DETERMINED THAT ANOTHER  
COUNTY IS AN SVP'S DOMICILE, A  
WRIT BY THE DISTRICT ATTORNEY OF  
THE ALLEGED DOMICILE COUNTY, IS  
AN APPROPRIATE REMEDY**

In the case of *People v. Karsai* (2013) 213 Cal.App.4th 774, a case procedurally similar to the instant writ petition, the superior court in Placer County conditionally released Karsai, a Sexually Violent Predator, to Santa Barbara County. (*Id.* at p. 778.) The District Attorney of Santa Barbara County brought a writ petition challenging various aspects of the superior court's ruling, including the determination of domicile, made by the Placer County superior court. (*Ibid.*) In the instant petition, the District Attorney of Los Angeles County challenges the determination of the Santa Clara County superior court that Hubbart's domicile is Los Angeles County. As in *Karsai*, writ petition is an appropriate remedy.

Further, mandamus is an appropriate remedy where a court has exceeded its jurisdiction. A court is not at liberty to follow only one portion of a statute that supports a desired outcome, and ignore those portions of the law that do not support a desired outcome. The LADA contends herein that the Santa Clara Superior Court exceeded its jurisdiction when it failed to consider the mountain of evidence that prior to Hubbart's incarceration on charges brought by Santa Clara County, he was



residing in Santa Clara County. The court further exceeded its jurisdiction, in that, even if there had been no evidence that Hubbard was residing in Santa Clara County, the presumption is then that the county of domicile is the county in which Hubbard was arrested, Santa Clara, or the county “from which he ... was last returned from parole”, which was San Bernardino. Having failed to follow any portion of section 6608.5, and ruling instead that Hubbard’s domicile is Los Angeles County despite all evidence to the contrary, and despite the provisions of section 6608.5, the superior court exceeded its jurisdiction and mandamus is appropriate. (*People v. Superior Court of Lassen County (Stanley)* (1979) 24 Cal.3d 622, 625-626.)

## II

**THE FAILURE TO FOLLOW THE PROVISIONS OF SECTION 6608.5 IS REVIEWED DE NOVO ON APPELLATE REVIEW. ANY DISCRETIONARY DETERMINATIONS MUST BE SUPPORTED BY SUBSTANTIAL EVIDENCE**

The issue of whether respondent superior court failed to follow the provisions of section 6608.5, presents a question of law and is subject to de novo review by this court.

The standards of review for questions of pure fact and pure law are well developed and settled. Trial courts and juries are better situated to resolve questions of fact, while appellate courts are more competent to resolve questions of law. Traditionally, therefore, an appellate court reviews findings of fact under a deferential standard (substantial evidence under California law, clearly erroneous under federal law), but it reviews determinations of law under a nondeferential standard, which is independent or de novo review. (See *People v. Lawler* (1973) 9 Cal. 3d 156, 160.)

(*People v. Cromer* (2001) 24 Cal. 4th 889, 893-894.) To the extent respondent superior court made findings of fact in determining domicile, such a ruling must be supported by substantial evidence. The LADA herein contends, that no evidence supported the trial court's determination that Hubbart's county of domicile is Los Angeles County.

### III

#### **SECTION 6608.5, BY ITS EXPRESS TERMS MANDATES THAT HUBBART BE CONDITIONALLY RELEASED TO THE COUNTY OF DOMICILE *PRIOR* TO HIS INCARCERATION FOR THE CHARGES BROUGHT BY SANTA CLARA COUNTY**

Section 6608.5, provides as follows:

(a) A person who is conditionally released pursuant to this article shall be placed in the county of the domicile of the person *prior to the person's incarceration*, unless the court finds that *extraordinary circumstances* require placement outside the county of domicile.

(b)(1) For the purposes of this section, "county of domicile" means the county where the person has his or her true, fixed, and permanent home and principal residence and to which he or she has manifested the intention of returning whenever he or she is absent. For the purposes of determining the county of domicile, the court may consider information found on a California driver's license, California identification card, recent rent or utility receipt, printed personalized checks or other recent banking documents showing that person's name and address, or information contained in an arrest record, probation officer's report, trial transcript, or other court document. If no information can be identified or verified, the county of domicile of the individual shall be considered to be the county in which the person was arrested for the crime for which he or she was last incarcerated in the state prison or from which he or she was last returned from parole.

(§ 6608.5.)

All the evidence presented at the hearing on Hubbard's conditional release demonstrated that Hubbard was residing in Santa Clara County at the time of his crimes, which were committed in Santa Clara County. After the first set of charges brought by Santa Clara, Hubbard was paroled to Santa Clara. Within months, he committed more crimes in Santa Clara. Thus, prior to his incarceration, Hubbard clearly resided in Santa Clara County, and that was his domicile. Respondent superior court however, failed to consider this portion of the statute and made no ruling as to where was Hubbard's county of domicile *prior* to his incarceration. (Exh. C.)

Even if the District Attorney of Los Angeles County had not presented a mountain of evidence demonstrating domicile in Santa Clara County, then the presumption is that if there is no information verifying domicile, then the "the county of domicile of the individual *shall* be considered to be the county in which the person was arrested for the crime for which he or she was last incarcerated in the state prison or from which he or she was last returned from parole."

Once again, respondent superior court failed to consider what was the county of arrest for which Hubbard was incarcerated. There is no finding or ruling in the Order for Conditional Release, indicating that the county of arrest was not Santa Clara County, even though it was Santa Clara that initiated the SVP petition.

The only basis upon which respondent superior court *apparently* ruled was that Los Angeles County was the county "from which he ... was last returned from parole." We say "apparently" because once

again, respondent superior court's order makes only the conclusory finding that "by a preponderance of the evidence ... Mr. Hubbart's County of Domicile is Los Angeles County," but cites to no evidence whatsoever by which domicile was proven by a preponderance of the evidence. Further, the ruling is legally incorrect. The statute specifically states that a consideration for determining domicile, absent any other proof, is the county from which the SVP was last returned from parole. The statute does not say where the SVP resided during the last period of parole. By its express terms, the county from which Hubbart was returned from parole was San Bernardino County. The Los Angeles County District Attorney does not in any way suggest here that San Bernardino is the proper domicile either. San Bernardino has no more nexus to Hubbart and his crime spree in Santa Clara, than does Los Angeles County. The absurdity of designating either Los Angeles County or San Bernardino as Hubbart's domicile is created by respondent superior court's failure to follow the law as provided in section 6608.5, in its entirety, and considering only that portion of the statute which provided respondent superior court with a way to point to some other county besides its own. Had respondent superior court considered the entire statute, given the evidence that Hubbart was residing in Santa Clara County from November 1979 to November 1981, all the while committing more crimes in various Northern California locations, including Sunnyvale and Santa Clara County, it would have had no choice but to find that prior to his incarceration to state prison on the last set of criminal charges brought against him, Hubbart's domicile was Santa Clara County.

#### IV

#### **DOMICILE IS DETERMINED AT THE POINT IN TIME PRIOR TO INCARCERATION ON THE LAST STATE PRISON COMMITMENT**

By the express terms of the statute, section 6608.5, subdivision (a), provides Hubbart is to be conditionally released in the county of domicile prior to his incarceration. It does not matter what Hubbart wants to call home now, or that he wants to be released in Los Angeles County. The reality is, no county wants Sexually Violent Predators released in their county. Realizing this, the Legislature has determined that a Sexually Violent Predator is to be conditionally released to the county of domicile, determined at that point in time before he was incarcerated. (§6608.5, subd. (a).) This is not a case where Hubbart was living in Los Angeles County and travelled to Santa Clara where he committed a sexual assault. He was committing rapes where he lived and where he was placed on parole. He was employed in Santa Clara at the time of the last series of offenses in June 1990 - his last incarceration to state prison, by Santa Clara County. It is equally irrelevant that Hubbart was raised in Los Angeles County as a child. That is not where he was residing when he committed the last series of rapes for which he was incarcerated.

A fair system for determining where to conditionally release a Sexually Violent Predator must be imposed and *followed*. It would be unfair to determine domicile by where a SVP has most recently been residing. SVPs reside in a county which has a California State Hospital that treats and houses Sexually Violent Predators. Thus, the Legislature has specifically provided, in section 6608.5, subdivision (b)(2), that the county

where the hospital facility is located “shall not be considered the county of domicile unless the person resided in that county *prior* to being housed in the hospital, prison, or jail.” (§ 6608.5, subd. (b)(2).) It is incumbent upon each county to follow the provisions enacted by the Legislature in determining where to conditionally release a Sexually Violent Predator. It is not for any county to find a way to release the SVP that has resided, and committed a series of heinous sexually violent offenses, within its borders, to another county.

V

**RESPONDENT SUPERIOR COURT  
ABUSED ITS DISCRETION IN FINDING  
LOS ANGELES COUNTY TO BE THE  
COUNTY OF DOMICILE, AND NO  
EVIDENCE SUPPORTS ITS  
DETERMINATION**

Besides respondent superior court’s error of law in failing to consider and follow the provisions of section 6608.5, its ruling based upon the facts before it is a patent abuse of discretion. All the evidence is that Hubbart resided in Santa Clara County prior to his last incarceration, and his last series of crimes was committed in Santa Clara County. Thus, even if respondent superior court had actually considered that portion of section 6608.5 which required the court to find the domicile to be his domicile prior to incarceration, any ruling that his domicile was other than Santa Clara is not supported by any evidence.

Even if respondent superior court had considered that portion of section 6608.5, that required the domicile to be the county of arrest (if the LADA had not provided evidence of domicile), Hubbart was clearly arrested in Santa Clara County for the crimes for which he was last

incarcerated to state prison. (§ 6608.5, subd. (b)(1).) There is no evidence to support any finding, express or implied, that Hubbard was arrested in any other county but Santa Clara.

The evidence that Hubbard was paroled by the formerly named California Department of Corrections to San Bernardino and lived in Los Angeles for two months, does not support a finding that Los Angeles County is Hubbard's domicile "prior to the person's incarceration" or now. There is no evidence that Hubbard has any relatives currently living in Los Angeles County. The relatives willing to allow Hubbard to live with them are in San Diego County and Mendocino County. The Legislature has enacted a statute for determining domicile of a Sexually Violent Predator. No county wants a Sexually Violent Predator released within its borders. If respondent superior court is not required to abide by the express terms of section 6608.5, and can fix the county of domicile to be any other county, besides its own, then chaos will be the order of the day, with each county attempting to shift domicile to another county for its most violent offenders.

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## CONCLUSION

For the reasons set forth, the ruling of respondent superior court, determining Hubbart's county of domicile to be Los Angeles County should be reversed, and respondent should be ordered to issue a new and different ruling finding the county of domicile to be the county where Hubbart resided and committed his last series of crimes, Santa Clara County.

Respectfully submitted,

JACKIE LACEY  
District Attorney of  
Los Angeles County

By

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Attorneys for Petitioner




CERTIFICATE OF WORD COUNT

Counsel of Record hereby certifies that pursuant to Rule 8.204(c)(1) of the California Rules of Court, the enclosed Petition is produced using 13-point Times scalable type including footnotes and contains approximately 4894 words, which is less than the 14,000 words permitted by this rule. Counsel relies on the word count of the computer program used to prepare this petition.

Dated:

7/9/13



ROBERTA SCHWARTZ  
Deputy District Attorney

DECLARATION OF SERVICE BY MAIL

On the date of execution hereof I served the attached document **(Petition for Writ of Mandate)** by depositing a true copy thereof, enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail in the County of Los Angeles, California, addressed as follows:

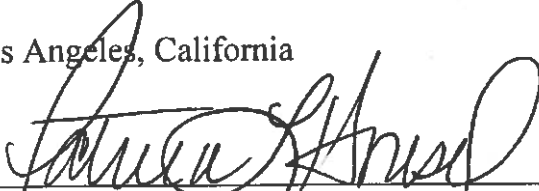
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Executed on July 9, 2013, Los Angeles, California

  
\_\_\_\_\_  
PATRICIA L. HOUSEL

DECLARATION OF SERVICE BY FAX

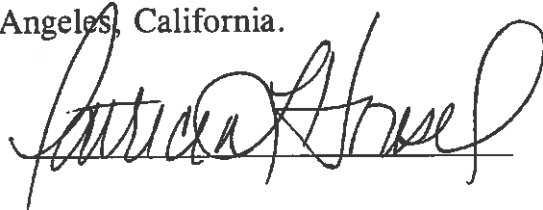
The undersigned declares under penalty of perjury that the following is true and correct:

I am over eighteen years of age, not a party to the within cause and employed in the Office of the District Attorney of Los Angeles County with offices at 320 West Temple Street, Suite 540, Los Angeles, California 90012.

I, further declare that I served the above referenced-to document by fax delivering a copy thereof addressed to:

JUDGE GILBERT BROWN  
Santa Clara County Superior Court  
Department 32  
190 W Heading, 4<sup>th</sup> Floor  
Santa Clara, CA  
Fax 408-808-7093

Executed on July 9, 2013, Los Angeles, California.

A handwritten signature in black ink, appearing to read "Patricia Howell", written over a horizontal line.