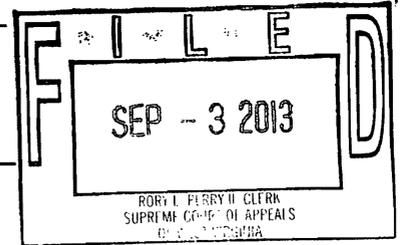


IN THE SUPREME COURT OF APPEALS OF WEST VIRGINIA

CHARLESTON, WEST VIRGINIA

Supreme Court Docket No. 13-0486



IN THE INTEREST OF:

H. S.

A CHILD UNDER THE AGE OF EIGHTEEN YEARS

Kanawha County Abuse and Neglect Case No. 12-JA-159
The Honorable Judge James C. Stucky

**RESPONSE OF THE GUARDIAN *AD LITEM*
FOR THE MINOR CHILD TO THE PETITION FOR APPEAL
BY C. S., RESPONDENT- FATHER BELOW**

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Guardian Ad Litem

August 30, 2013

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TABLE OF CONTENTS

TABLE OF AUTHORITIES.....2
KIND OF PROCEEDING AND STATEMENT OF THE CASE.....3
STATEMENTS OF FACTS.....3-7
STATUS OF THE CHILD.....7
ASSIGNMENT OF ERROR.....7
STANDARD OF REVIEW.....8
POINTS OF LAW AND AUTHORITIES RELIED UPON.....8-9
ARGUMENT9-12
CONCLUSION.....13
STATEMENT REGARDING ORAL ARGUMENT.....13
EXHIBITS

TABLE OF AUTHORITIES

In re Emily, 208 W.Va. 325, 540 S. E.2d 387 (1999)
In re Katie S., 198 W.Va. 79, 479 S.E.2d 589 (1996)
In re: Tiffany Marie S., 196 W.Va. 223, 470 S. E. 2d 177 (1996)
Lowe v. Lowe, 179 W.Va. 536, 370 S.E.2d 731 (1988)
Michael H. v. Gerald D. 491 U.S. 110, 130 (1983)
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Tevya W., v. Trad, 227 W.Va. 618, 712 S.E.2d 786 (2011)
Troxel v. Granville, 530 U.S. 57 (2000)
West Virginia Code Section §49-6-5 (a) (6)

I.

KIND OF PROCEEDING AND STATEMENT OF THE CASE

The Appellant, Mr. C. S. is the biological father of H. S. Ms. V. S. is the biological mother of this minor child. The undersigned is the Court appointed *Guardian Ad Litem* for the involved minor child.

The underlying proceedings in this matter were initiated in the Family Court of Kanawha County. The matter was later transferred to the Circuit Court of Kanawha County, West Virginia. Following additional and extended proceedings, the State of West Virginia moved the Court to terminate the parental rights of Mr. C. S. the biological father. The said father opposed this motion. The Circuit Court ultimately entered an order which terminated the parental rights of Mr. C. S. with regard to the involved minor child.

This proceeding is an appeal by Mr. C. S. from the order entered in the Circuit Courts of Kanawha County, West Virginia, terminating his parental rights. (See, Order of April 25, 2013, 12-JA-159).

II.

STATEMENT OF FACTS

Ms. V. S. and Mr. C. S. are the natural parents of H. S., who was born on [REDACTED]. The parties were never married to each other. This matter was previously pending before the Family Court of Kanawha County on multiple issues. An earlier Petition for Support filed by the Bureau for Child Support Enforcement and a Petition for parenting time filed by Mr. S were consolidated under Case Numbers 09-D-2778 and 09-D-2164.

By order dated December 7, 2009, the Family Court of Kanawha County appointed the undersigned to serve as a *Guardian Ad Litem* on behalf of the said minor child. During the course of that assignment, the various issues were investigated and the Family Court issued multiple orders. Initially, Ms. V. S. was designated the primary responsible parent. Mr. C. S. was permitted to exercise parenting time in the residence of the child's paternal grandparents. The parties observed the designated parenting schedule until approximately February 25, 2010, when Ms. V. S. filed a "Motion for Temporary Relief." She then requested "custody" of the minor child. Specifically, she alleged that there was reason to believe the child had been treated

inappropriately while in the presence of Mr. C. S. and his family. The Family Court entered a temporary order permitting Ms. V.S. to “have sole and exclusive care, custody, and control of the parties’ minor child.” A “Second Temporary Order” entered in March, 2010, modified the earlier temporary order and permitted Mr. C. S. to have limited visitation as permitted by the Guardian *Ad Litem* and under the supervision of the paternal grandparents.

During the period of the supervised visitations, the investigation into the aforementioned allegations continued. That investigation included interviews with the parties, the maternal grandmother and the paternal grandparents. The minor child was observed. In addition to home visits, records from Child Protective Services and the child’s health care providers were reviewed.

The results of the investigation of the Guardian *Ad Litem* were presented in reports and testimony during hearings before the Family Court. The Family Court’s subsequent orders permitted Mr. C. S. to continue to participate in the parenting of H.S. Given the parties’ admissions and the results of random drug testing and a history of potential overuse of prescription medications by Mr. C. S. and the use of illegal drugs by Ms. V. S., the parties were required to undergo random drug testing. The parties negotiated a specific parenting schedule. The case remained under the jurisdiction of the Family Court.

Despite the Family Court’s specific order and retention of jurisdiction, Ms. V. S. continued to aver that the child had been inappropriately touched while in the presence of Mr. C. S. and his parents. She applied for and received an order in the Magistrate Court of Kanawha County which resulted in her receiving primary control of the minor child and eliminating Mr. C. S.’s parenting time. These efforts were based upon the allegations and information previously considered by the Family Court.

In response to a motion filed by the Guardian *Ad Litem*, the Family Court entered an order temporarily transferring the care of the minor child of the parties to Mr. C. S. Following a hearing held on November 17, 2010, the Court transferred primary parenting responsibilities to Mr. C. S. Ms. V. S.’s right to visitation continued.

Given Ms. V. S.’s continuing behaviors and allegations of misconduct, a Petition was filed by the West Virginia Department of Health and Human Resources which alleged that the parties’ minor child was neglected and abused. Finding there was “imminent danger to the physical well-

being of the child” the Circuit Court of Kanawha County filed the Petition and set this matter for hearing. The Court also appointed the undersigned as Guardian *ad Litem* for the minor child. (See, AR 1-8 & 299-307).

During subsequent hearings, the Circuit Court permitted Ms. V. S. to have supervised visits with the child. Counseling and drug testing were ordered. This matter remained before the Court pursuant to the aforementioned Petition and Orders. (Id. at 15-18).

The results of the ongoing investigation in this matter were reported to the Circuit Court. Specifically, the Court was advised of Ms. V. S.’s allegations that the child had been inappropriately touched by Mr. C. S. and in the presence of the paternal grandparents. She had also alleged that Mr. C. S. may not be the child’s biological father. (Id. at 19-50).

Mr. C. S., who was living with his parents and gainfully employed, consistently denied interacting inappropriately with the child. He admitted to taking prescription pain medication for difficulties with his back. He denied abusing the same. While in the care of V. S., H. S. reportedly broke her arm in a fall on a trampoline. There were no indications H. S. was afraid of or did not wish to interact with Mr. C. S. (Id.)

Throughout the course of the proceedings in Family Court, Ms. V. S. accused Mr. C. S. of engaging in inappropriate activities in the presence of the child. She continuously raised questions of potential molestation. Further, she questioned his ability to biologically father a child. She previously requested a paternity test because “H. S. [did] not look like Mr. C. S.” She also noted that she was involved in a relationship with “a man” who was “good to H. S. and wanted to adopt her.” Ms. V. S. presented the child for multiple invasive medical evaluations. (Id).

Mr. C. S. denied being inappropriate with the child. He cooperated with investigators affiliated with law enforcement and the Department of Health and Human Resources. He also cooperated with counselors and the Guardian *Ad Litem*.

Ms. Monica Ballard, a supervised psychologist, evaluated the minor child and found her to be somewhat defiant. She also interacted with Ms. V. S. and Mr. C. S. She recommended in home services for all relatives who may be caring for the child. She noted that the parents had openly discussed the pending matter with the child. At times, the child’s observed mood was less than happy. Further, her appearance was less than acceptable as her hair was “uncombed

and knotted and she was dirty.” She was then in the care of Mr. S and the paternal grandparents.

During the pendency of this matter in Family and Circuit Court the minor child was enrolled at Gateway Christian Education Center. Personnel at the center described Ms. V. S.’s behaviors as inappropriate and disruptive. Specifically, it was reported that Ms. V. S. lingered near the facility. This behavior continued after she was asked to discontinue the same. Encounters with the maternal grandmother were also many of the child’s teachers described Ms. V. S. as disruptive.

The aforementioned allegations of sexual misconduct were investigated by the West Virginia State Police. Mr. C. S. cooperated. That investigation did not substantiate Ms. V. S.’s allegations. Both parties were subjected to random drug screenings. Mr. C. S.’s test results were positive for the medications prescribed for his back condition. Ms. V. S.’s results revealed the presence of marijuana. Other testing indicated that her samples were “diluted”. Services were provided and Ms. V. S.’s visitations were monitored. Overall, her cooperation and behaviors improved. (See, AR Vol. III 5-57; Trans. July 9, 2012)

Another male eventually filed a request for “a paternity test” in the Family Court of Kanawha County. Essentially, he alleged that he was “involved with Ms. V. S.” near the time the minor child may have been conceived. The Family Court denied the request as delayed and not in the best interests of the child.

During, the proceedings in Circuit Court the child were interviewed by Ms. Marta Gillespie, a psychologist. Ms. Gillespie reported that the child had stated that Mr. C. S. had touched her “pee pee”. However, the child later made contrary statements and refused to further discuss the matter.

In addition to the allegations of a sexual nature, the Circuit Court was provided information regarding Mr. C. S.’s use of prescription medications and reliance on his parents for assistance with the child. There were also allegations and testimony from Department of Health and Human Resources Personnel regarding behaviors of the paternal grandmother which were of concern. The Court provided Mr. C. S. with opportunities to improve. The effectiveness of his efforts was contested. (Id. at 100-111).

Following additional hearings the Circuit Court entered, an order on April 25, 2013, which *inter alia* found that H. S. to be “an abused and neglected child. The Court also ruled

that there is no reasonable likelihood that the conditions of abuse and neglect would improve or could be substantially corrected in the near future. The Court found that Mr. C. S. had made no efforts to rectify the circumstances which led to the filing of the Petition. More specifically, the Court ruled that Mr. C. S. had not followed through with a reasonable family case plan or other rehabilitative services, the efforts of social, medical, mental health, or other rehabilitative agencies designed to reduce or prevent the abuse and neglect of the Respondent Child as evidenced by the continuation of conditions which threaten the welfare or life of the Respondent Child. The Court concluded that the best interest of the Respondent Child requires termination of the parental rights of Mr. C. S.; and that there are no reasonable, available and less drastic alternatives to the permanent termination of the parental rights of Mr. C. S. Finally, the Court found that the West Virginia Department of Health and Human Resources was not required to make reasonable efforts to avoid removing the Respondent Children from the home and to reunify the family. (AR Vol. I. 50-53).

The Circuit Court terminated the parental rights of Mr. C. S. and placed H. S. in the permanent custody of Ms. V. S., her mother. This proceeding is an appeal by C S from the order entered in Circuit Courts of Kanawha County, West Virginia on April 15, 2013. This brief is filed on behalf of the involved minor child, the most important party to the litigation.

III.

STATUS OF THE CHILD

The minor child remains in the permanent custody of Ms. V. S. her biological mother.

IV.

ASSIGNMENTS OF ERROR

Whether, when viewed in light of the considerations necessitated by the best interests of the child, the decision of the Circuit Court of Kanawha County which terminated the rights of the Appellant-father, Mr. C. S., and placed the minor child in the permanent custody of the her mother Ms. V. S., is legally and factually correct and in the best interest of the minor child?

V.

STANDARD OF REVIEW

In abuse and neglect cases conclusions of law entered by a Circuit Court are subject to *de novo* review when there is a trial of the facts without a jury. Further, the Circuit Court is required to make determinations based upon the evidence. The court must make findings of fact and conclusions of law as to whether the involved child is abused and neglected. The findings of the Circuit Court will not be set aside by a reviewing court unless clearly erroneous. Although there may be evidence to support the finding, the same may not be clearly erroneous unless the reviewing court on the entire evidence is definitively and firmly convinced that a mistake has been committed. Clearly, a reviewing court may not overturn a finding simply because it would have decided the case differently. When the Circuit Court's analysis of the evidence is plausible in light of the entire record, the same should be affirmed. See, *In re: Tiffany Marie S.*, 196 W.Va. 223, 470 S. E. 2d 177 (1996).

The Circuit Court may terminate parental rights "upon a finding that there is no reasonable likelihood that the conditions of neglect or abuse can be substantially corrected." *W. Va. Code* § 49-6-5 (a) (6).

VI.

POINTS OF LAW AND AUTHORITIES RELIED UPON

When viewed in light of the considerations necessitated by the best interests of the child, the decision and order of the Circuit Court of Kanawha County which terminated the parental rights of the Appellant-father, Mr. C. S., and placed the minor child in the permanent custody of her mother, Ms. V. S., may not be in the best interests of the minor child as it failed to provide for a less drastic alternative, i. e. post-termination visitation.

In re Emily, 208 W.Va. 325, 540 S. E.2d 387 (1999)

In re Katie S., 198 W.Va. 79, 479 S.E.2d 589 (1996)

In re: Tiffany Marie S., 196 W.Va. 223, 470 S. E. 2d 177 (1996)

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Michael K.T. v. Tina L.T., 182 W.Va. 399, 405, 387 S.E.2d 866, 872 (1989)

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Tevya W., v. Trad, 227 W.Va. 618, 712 S.E.2d 786 (2011)

Troxel v. Granville, 530 U.S. 57 (2000)

West Virginia Code Section §49-6-5 (a) (6).

VII. ARGUMENT

When viewed in light of the considerations necessitated by the best interests of the child, the decision and order of the Circuit Court of Kanawha County which terminated the parental rights of the Appellant-father, Mr. C. S., and placed the minor child in the permanent custody of her mother, Ms. V. S., may not be in the best interests of the minor child as it failed to provide for a less drastic alternative, i. e. post-termination visitation.

The issues involved in this case are governed by various sections of the West Virginia Code. Specifically, West Virginia Code Section §49-6-5-(a) (6) in relevant part provides that “upon a finding that there is no reasonable likelihood that the conditions of neglect or abuse can be substantially corrected in the near future and, when necessary for the welfare of the child[ren], [the Court may] terminate the parental, custodial, and guardianship rights and responsibilities of the abusing parent...” In this case the Circuit Court of Kanawha County entered an order which was detailed and set forth findings of fact and conclusions of law. This Court has long recognized that the welfare of children “is the polar star by which the discretion of the Court is matters such as this will be controlled. *Tevya W., v. Trad*, 227 W.Va. 618, 712 S.E.2d 786 (2011); *Lowe v. Lowe*, 179 W.Va. 536, 370 S.E.2d 731 (1988).

This is a very unfortunate case. Over time, the parents proved themselves to be less than motivated and cooperative. Further they exhibited an ongoing history of animosity. Their overall levels of cooperation and animosity gave rise to grave concerns.

Ms. V. S. engaged in a significant course of behavior which raised substantial concerns regarding her abilities to parent the parties’ child. Her ongoing and repetitive allegations regarding molestation resulted in the child being subjected to multiple invasive medical examinations. Further, the child was moved from one parent to the other. Also, Ms. V. S. failed multiple drug screenings. (See, Trans., August 9, 2012, at pp. 22-28, AR Vol. II 134-141). The Appellant-father has diagnosed medical condition for which he takes medication. Unfortunately these medications appeared to impair his ability to provide solo and independent child care. He

relied upon his parents for assistance with the child. Although, both parents exhibited concerning deficiencies, Ms. V. S. appears to have benefited the most from extended improvement periods. Mr. C. S. continued to experience difficulties. Before addressing the question of whether these concerns rose to the level necessary to justify the permanent termination of his rights, one must acknowledge the child's need for stability. Further, there is reason to question whether the totality of the circumstances required for the consideration of alternatives less drastic than the permanent termination of the Appellant-father's rights.

The Circuit Court's conclusion that "there is no reasonable likelihood that the conditions of abuse and neglect can be substantially corrected in the near future, as Mr. C S. has made no efforts to rectify the circumstances that led to the filing of this Petition," should be reconsidered or revisited. Throughout the proceedings in Family and Circuit Court Ms. V. S. exhibited behaviors which were questionable. Yet, she was afforded multiple opportunities to make corrections. Multiple improvement periods were extended. Such actions appear to indicate that there were reasons to believe changes could occur. Further, she was ultimately able to receive "permanent custody of the child." When viewed in light of the permanent termination of Mr. C. S.'s rights it appears she has achieved her pursued goal, i.e. having him completely removed from one child's life so she could be reared by another male.

Mr. C. S. also exhibited behaviors indicative of a need for assistance. However, it does not appear he was afforded opportunities to improve which were equal to those extended to Ms. V. S. The fact that no post-termination contact was approved tends to suggest that the fact H. S. knows her father was not considered. The record contains evidence that H. S. knows her father and had interacted with him in a safe manner.

In his brief, the Appellant alluded to the decision of the United States Supreme Court in *Troxel v. Granville*, 530 U.S. 57 (2000). The facts of the instant case and *Troxel* are easily distinguishable on their individual facts. *Troxel* involved an attempt to restrict visitation. In the instant case, the Appellant, Mr. C. S., is attacking the termination of his parental rights. A relationship exists between Mr. C. S. and the minor child. Despite the Court's statements in *Troxel*, it is important to note that the minor child has rights. As Justice Stevens stated, children also have constitutionally protected interests which must be considered and balanced. (*Id.*) See also, *Michael H. v. Gerald D.* 491 U.S. 110, 130 (1983). The overall evidence of record in this

case demonstrates that continuing contact with C. S. may be in the best interests of the minor child.

The Appellant desires to have his parental rights restored. The state wishes to terminate the relationship which exists between Mr. C. S. and the minor child. The position of these parties overlooks the fact that children have an interest in preserving familial relationships. Further, there is a difference between the termination of parental rights with or without post-termination contact.

In his brief, the Appellant suggests that the Family and Circuit Courts of Kanawha County ignored potential evidence that the child “recanted” her statement that her father had touched her. This argument fails to note that the child had been through multiple examinations, evaluations, and interviews. Although she stopped talking, there is no indication of a “recantation.” To the contrary there are reasons to believe she was confused. (See, Trans., August 9, 2012, at pp. 24-27, AR Vol. II. at 137-140). All investigations failed to conclusively demonstrate that she had been specifically touched by Mr. C. S. However, it is important to note that Mr. C. S. takes a prescribed medication which impairs his ability to care for himself and the child. Unfortunately this concern did not improve during the pendency of the proceedings below. Nonetheless, full termination of his rights without provisions for post-termination contact with the child may be more drastic than necessary. This conclusion is supported by the conduct of the mother, her desire to have Mr. C. S.’s rights terminated and the absolute removal of him from the child’s life.

The existing circumstance raises concerns regarding the permanent termination of Mr. C. S.’s parental rights without post-termination contact. There are reasons to anticipate that the best interests of the child may be negatively impacted by such termination. The available information and the conduct of the mother reflect an environment which placed stress and instability in the life of this minor child. The obvious animosity which existed between Mr. C. S. and Ms. V. S. was of is of immense concern. By her own statements, Ms. V. S. wanted Mr. C. S. removed from the child’s life. Regardless of the motive, the mother engaged in behaviors which were not in the best interests of the minor child. Given the feelings this child had for her father, totally

removing him from her life may not be in her best interest. This concern is heightened by the past behaviors of the mother, the parent who now has permanent custody.

As noted during the hearing in Circuit Court, the undersigned as Guardian *Ad-Litem* had asked the Court not to terminate the Petitioner's parental rights. (AR 207). When viewed in light of the mother's behavior and the child's equivocal statements, the termination of Mr. C. S.'s parental rights without post-termination contact remains questionable (Id.)

Although Circuit Courts may terminate parental rights "[u]pon a finding that there is no reasonable likelihood that the conditions of neglect or abuse can be substantially corrected," additional alternatives should be considered.

The Due Process Clause of the Fourteenth Amendment to the United States Constitution protects the fundamental right of parents to make decisions concerning the care, custody and control of their children. It is well settled in West Virginia that termination of parental rights is the most drastic remedy available relating to the disposition of child abuse and neglect cases. See, *In re Emily*, 208 W.Va. 325, 540 S. E.2d 387 (1999). "Although parents have substantial rights that must be protected, the primary goal in cases involving abuse and neglect, as in all family law matters, must be the health and welfare of the children." In all cases involving the disposition of an abuse and neglect case, this Honorable Court has consistently stated that "the best interests of the child is the polar star by which decisions must be made which affect children." *Michael K.T. v. Tina L.T.*, 182 W.Va. 399, 405, 387 S.E.2d 866, 872 (1989) *In re Katie S.*, 198 W.Va. 79, 479 S.E.2d 589 (1996).

"When parental rights are terminated due to neglect or abuse, the Circuit Court may consider whether continued visitation or other contact with the abusing parent is in the best interest of the child. The evidence must indicate that such visitation or continued contact would not be detrimental to the child's well being and would be in the child's best interest." Syllabus Point 5, *In re Christina L.*, 194 W.Va. 446, 460 S.E.2d 692 (1995). *State ex rel. Amy M. v. Kaufman*, 196 W.Va. 251, 260, 470 S.E.2d 205, 214 (1996). Inasmuch as H. S. has had a bond with her father, this matter should be remanded to the Circuit Court to determine whether post-termination visitation would be detrimental to the child's well being and best interest.

VII.
CONCLUSION

When considered in light of the best interests and needs of the child, the rulings and orders of the Circuit Court of Kanawha County which terminated the Appellant-father's parental rights may legally and factually incorrect as it failed to address the issue post-termination contact. Therefore, this matter should be remanded to the circuit court for a hearing to determine whether post-termination visitation would be detrimental the child's well being and best interest.

IX.
STATEMENT REGARDING ORAL ARGUMENT

The Appellant-father has requested oral argument in this case. The Respondent, the State of West Virginia has expressed the belief that oral argument is not necessary. Without waiving the right to respond to any oral arguments permitted in this matter, the *Guardian Ad Litem* leaves the determination of whether oral argument will be authorized to the sound discretion of this Court.

Respectfully Submitted,
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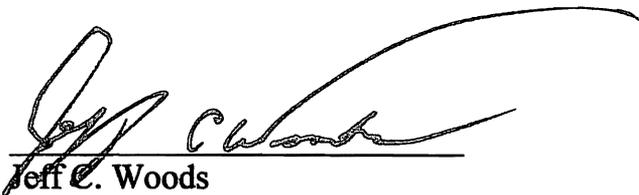
CERTIFICATE OF SERVICE

I, Jeff C. Woods, hereby certify that on this the 30th day of August, 2013, a copy of the attached **“Response of the Guardian Ad Litem for the Minor Child to the Petition for Appeal by C. S., Respondent-father Below ”** was served by forwarding a true and correct copy *via* telefax and United States mail postage prepaid as follows:

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