NO. 1001673

SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

DEMARCUS WILLIAMS,

Petitioner.

Pierce County Superior Court Cause No. 17-1-02234-1
Court of Appeals Cause No. 54313-3-II

ANSWER TO PETITION FOR REVIEW

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I. INTRODUCTION

Demarcus Williams negotiated a plea agreement with the State in which he received a significant reduction in charges in exchange for his guilty plea to one count of assault in the first degree with a deadly weapon enhancement. Both Williams and the State jointly recommended a standard range sentence, which the trial court imposed. Williams was represented by counsel.

Williams was later resentenced due to an offender scoring issue, and he was again represented by counsel. Both the State and Williams's attorney requested the low end of the standard range. Williams filed a pro se motion citing legal authority for an exceptional mitigated sentence. At the hearing, however, Williams did not request an exceptional sentence or any particular sentence during his allocution. He spoke at length about his personal circumstances and asked the trial court to take those circumstances into consideration when imposing his sentence. The trial court imposed the low end of the standard range as requested by counsel.

The Court of Appeals properly concluded that the trial court was not required to consider the pro se sentencing memorandum filed by Williams. It is well-established that a defendant does not have the right to file pro se legal motions and memoranda when represented by competent counsel, and Williams was afforded the opportunity to personally address the court at sentencing and present mitigating information in accordance with RCW 9.94A.500(1). This Court should therefore deny review.

II. RESTATEMENT OF THE ISSUES

A. Criminal defendants have a statutory right to address the court at sentencing and present mitigating information. Was Williams afforded his statutory right of allocution when he personally addressed the court at his sentencing hearing and asked the court to take his personal circumstances into consideration when imposing sentence?

B. Represented parties do not have the right to file pro se motions. Was the trial court required to consider Williams's pro se sentencing memorandum that relied on legal authority for his requested exceptional mitigated sentence, when Williams was represented by competent counsel?

C. Did the trial court properly exercise its discretion in imposing a standard range sentence, when Williams's attorney asked the court to impose the low end of the standard range based on his youth, the court listened to Williams's allocution, and the court then determined that the low end of the standard range was appropriate?

III. STATEMENT OF THE CASE

In 2017, Demarcus Williams fought with his ex-girlfriend and then fired multiple shots toward her vehicle as she drove away with their young child. CP 4-6, 19. Williams was 19 years old at the time of the shooting. CP 110; 4RP 8. The State charged Williams with three counts of assault in the second degree with firearm and deadly weapon enhancements, one count of unlawful possession of a firearm in the first degree, and one count of malicious mischief in the third degree. CP 1-3. Williams negotiated a plea agreement with the State and agreed to plead guilty to one count of assault in the first degree with a deadly weapon enhancement. CP 10-20; 2RP 3-4. In exchange for his guilty plea, the State agreed not to charge Williams with any

matters in the State's possession and to dismiss Williams's other pending criminal case. CP 14; 2RP 3, 7.

The parties jointly recommended a standard range sentence of 155 months, plus the 24-month deadly weapon enhancement, for a total of 179 months in the Department of Corrections. CP 14; 2RP 6-7, 12-14. Williams's attorney informed the court,

> [Williams] understands that this is a global resolution, one of the reasons why he's stepping forward, but the main reason is he's accepting responsibility. As [the State] has said, this was an agreed recommendation. As such, I don't believe the *O'Dell* factors for youthfulness are at issue and they don't need to be addressed in this sentencing. But we'd ask that the Court accept the agreed recommendation.

2RP 13. The trial court accepted the joint recommendation of the parties and sentenced Williams to 179 months. CP 30; 2RP 15.

Williams did not file a direct appeal. His judgment and sentence became final on November 28, 2017, when the trial court entered it. CP 24-37. Over one year later, on April 12, 2019, Williams filed a personal restraint petition, claiming his

judgment and sentence was facially invalid, and his plea of guilty was involuntary, because his offender score was miscalculated. CP 39. The State conceded that Williams was entitled to resentencing based on his miscalculated offender score. CP 39. However, the State argued that Williams was not allowed to withdraw his guilty plea, because his guilty plea claim was time barred. CP 39. The Court of Appeals agreed with the State, remanded the matter for resentencing, and denied Williams's time barred claim. CP 39-40.

Resentencing was held on January 10, 2020. *See* 4RP *generally*. The State argued that Williams's offender score should be calculated as "3" with a standard range of 120 to 160 months, and it asked the court to impose the low end of the standard range, plus the 24-month deadly weapon enhancement, for a total of 144 months. CP 103-104; 4RP 3-4. The State noted that Williams had previously agreed to a midrange sentence based on the higher miscalculated offender score. 4RP 3-4.

Williams was represented by counsel at resentencing. *See* 4RP 3, 5. His attorney argued that Williams's offender score should be calculated as "2" instead of "3," because his prior convictions involved the same criminal conduct. CP 43, 45; 4RP 5-8. His attorney asked the court to impose the low end of the standard range, 111 months, based on Williams's age at the time of the offense.[1] CP 45; 4RP 8-9. Defense counsel argued,

> [H]e was only 19 at the time of the offense, and there is some – you know, certainly studies and case law and the Washington State Supreme Court has adopted the information that the brain development information with regard to age. Clearly kids don't make the same or right decisions as adults. That's what the studies are concluding is that the brain development doesn't stop at age 18. And so treating somebody who is 19 the same as somebody who is 45 is not necessarily a – I mean, there is court discretion with regard to sentencing.
>
> So certainly that is a factor I would ask the Court to consider with regard to the low end of any sentencing range.

[1] Defense cited *State v. Houston-Sconiers*, 188 Wn.2d 1, 393 P.3d 409 (2017), and *State v. O'Dell*, 183 Wn.2d 680, 358 P.3d 359 (2015), in support of its request for a sentence at the low end of the standard range. CP 45.

4RP 8-9.

Defense counsel also noted that Williams had prepared a "statement" for the court to read, and the court acknowledged reading it. 4RP 9. The handwritten statement was titled "Mitigating Circumstances In Support of Downward Exceptional Sentence" and cited both caselaw and the Sentencing Reform Act of 1981 (SRA). CP 122-128. Williams argued that his previously imposed 15-year sentence was inappropriate based on his personal circumstances and the legal authority cited therein. CP 122-128.

After hearing from defense counsel, the court gave Williams the opportunity to speak before sentencing. 4RP 10. Williams did not reference his written pleading, nor did he specifically request an exceptional mitigated sentence or any particular sentence. *See* 4RP 10-15. He did, however, speak at length regarding his individual circumstances and asked the court to take them into consideration. 4RP 10-15.

Williams discussed what he had learned while in prison. 4RP 10-11. He said he was an "adolescent who was actively taking steps towards self-betterment." 4RP 12. Williams discussed his untreated mental health issues and his criminal behavior as a youth. 4RP 12-13. He explained that he was on "large quantities of Xanax" when he committed the offense. 4RP 13. Williams also indicated that he had been overcharged by the State, and "an Assault 2, run concurrent, would've been a more just sentence" than the first degree assault charge to which he pleaded guilty. 4RP 15. He asked the court to consider that his sentencing range was based on past juvenile crimes and said, "[N]ow that I'm becoming a man, I should be given the opportunity." 4RP 14-15.

After listening to Williams's allocution, the trial court stated,

> Thank you. And I appreciate your words, Mr. Williams, and I appreciate what you've written out, and appreciate that you're taking the time to learn about yourself and to turn a corner, so I applaud you for that, and I applaud you for the efforts you're making that

> [defense counsel] talks about with you taking classes. And that's a big deal, and you do have a lot of life ahead of you, so I applaud you for that and I encourage you to stay with that.

4RP 15-16. The court ruled in favor of the defense on the same criminal conduct argument and sentenced Williams based on an offender score of "2." 4RP 16; CP 111. The court imposed the low end of the standard range as recommended by both defense counsel and the State. 4RP 16; CP 111, 114.

Williams appealed his standard range sentence. CP 130. The Court of Appeals affirmed in an unpublished opinion, finding that the trial court did not abuse its discretion by not expressly addressing an exceptional mitigated sentence, because defense counsel requested a standard range sentence, Williams did not ask to proceed pro se, and Williams's pro se motion contradicted counsel's request. Thus, Williams did not make a valid request for an exceptional downward sentence. *State v. Williams*, No. 54313-3-II, 2021 WL 3361655 (Wash. Ct. App. August 3, 2021) (unpublished).

IV. ARGUMENT

A. There is no basis for review where the Court of Appeals followed well-established law and properly concluded that the trial court did not abuse its discretion when it considered the legal arguments of defense counsel and the oral allocution of Williams before imposing a standard range sentence.

The Court of Appeals correctly held that Williams is not entitled to resentencing, because the trial court acted within its discretion when it imposed the standard range sentence requested by defense counsel. The trial court was not required to consider Williams's handwritten statement which amounted to a pro se legal memorandum for an exceptional mitigated sentence. The trial court afforded Williams the opportunity to speak at sentencing and present mitigating information, and Williams did just that. During his oral allocution, Williams discussed his personal circumstances and his youth, and he neither disagreed with defense counsel's standard range sentence recommendation nor requested a different sentence. Williams therefore fails to

show that review is warranted under RAP 13.4(b)(1) and RAP (4).[2] This Court should deny review.

1. Williams was given the opportunity to address the court at sentencing and present information in mitigation of his sentence.

"Allocution is the right of a criminal defendant to make a personal argument or statement to the court before the pronouncement of sentence." *State v. Canfield*, 154 Wn.2d 698, 701, 116 P.3d 391 (2005). "It is the defendant's opportunity to plead for mercy and present any information in mitigation of sentence." *Id*.

The right of allocution at sentencing is a statutory right, not a constitutional one. *Canfield*, 154 Wn.2d at 708. *See* RCW 9.94A.500(1) ("The court shall…allow arguments from the prosecutor, the defense counsel, [and] the offender…as to the sentence to be imposed."). Denial of the right to allocute is "'an

[2] Pursuant to RAP 13.4(b)(1) and (4), this Court will only accept a petition for review if the decision of the Court of Appeals conflicts with a decision of the Supreme Court or if the petition involves an issue of substantial public interest.

error which is neither jurisdictional nor constitutional,' nor is it 'a fundamental defect that inherently results in a complete miscarriage of justice.'" *Canfield*, 154 Wn.2d at 702–03 (quoting *Hill v. United States*, 368 U.S. 424, 428, 82 S. Ct. 468, 7 L. Ed. 2d 417 (1962)). Moreover, the right of allocution is waived if not asserted at sentencing. *See Canfield*, 154 Wn.2d at 707.

Williams was afforded his statutory right of allocution by addressing the trial court at length on matters of mitigation during his resentencing hearing and prior to the imposition of his sentence. *See, e.g., In re Pers. Restraint of Echeverria*, 141 Wn.2d 323, 336, 6 P.3d 573 (2000). The record shows the trial court asked Williams, "[A]nything you wish to say to the Court before the Court passes sentence?" 4RP 10. In response, Williams apologized and proceeded to discuss his time in prison, his difficult upbringing, and his struggles with anxiety and depression. 4RP 10-15. Williams said,"[I] hope the courts will see I was truly a misguided youth who never intended harm to anyone, and that with the proper tools, which I've already began

to utilize, and continue that behavior, I can truly be an asset to society." 4RP 14.

Williams also argued against the almost 15-year sentence that was imposed at his first sentencing hearing. 4RP 11-12; *see* CP 30. He did not refer to his written statement during his allocution. He did not specifically request an exceptional sentence below the standard range. He did not request any particular sentence. Williams argued he should not spend "18 years in the Department of Corrections" based on his juvenile criminal history and for a crime where no one got hurt. 4RP 14. Williams's allocution met the requirement of RCW 9.94A.500(1).

The Court of Appeals decision does not conflict with *Green v. United States*, 365 U.S. 301, 81 S. Ct. 653, 5 L. Ed. 2d 670 (1961), in which the Court held that Federal Criminal Rule 32(a) requires the sentencing judge to address the defendant personally and allow the defendant to make a statement on his own behalf and present information in mitigation of punishment

before the judge imposes sentence. Here, the trial judge addressed Williams personally, asked if there was anything he wished to say before the court imposed its sentence, and allowed Williams to make a statement on his own behalf and present information in mitigation of punishment. 4RP 10-15.

Nor does the Court of Appeals decision conflict with this Court's holding in *Canfield*. In that case, the Court affirmed the principle that a criminal defendant has a statutory right of allocution at sentencing and recognized a limited right of allocution at revocation hearings. *Canfield*, 154 Wn.2d at 701. Williams's case does not involve a revocation hearing, and again, he was given the "opportunity to plead for mercy and present any information in mitigation of sentence." *See id*.

The fact that the trial court imposed a sentence at the low end of the standard range—as requested by defense counsel—does not itself show that Williams was denied his right of allocution. *See In re Echeverria*, 141 Wn.2d at 338 (rejecting the petitioner's claim that he was not allowed to address the trial

court and argue for leniency, which could have convinced the court to impose a less severe sentence). The trial court gave Williams the opportunity to speak at his resentencing hearing in accordance with RCW 9.94A.500(1). Although Williams may now, in hindsight, wish that he had presented a different argument to the trial court or said something more, that does not mean his statutory right of allocution was abridged or denied. Review of this case is not warranted.

2. Williams was represented by competent counsel at sentencing and did not have the right to file a pro se sentencing memorandum.

Criminal defendants have a constitutional right to counsel at sentencing. U.S. Const. amend. VI; Const. art. I, § 22; *State v. Robinson*, 153 Wn.2d 689, 694, 107 P.3d 90 (2005). They also have a constitutional right to waive assistance of counsel and represent themselves. *State v. Curry*, 191 Wn.2d 475, 482-83, 423 P.3d 179 (2018). "The right to self-representation in a criminal matter…is an all-or-nothing process." *State v. Romero*, 95 Wn. App. 323, 325–26, 975 P.2d 564 (1999).

This Court has repeatedly stated, however, that there is no constitutional right to "hybrid representation," whereby a defendant serves as co-counsel with his attorney. *See State v. DeWeese*, 117 Wn.2d 369, 379, 816 P.2d 1 (1991); *State v. Bebb*, 108 Wn.2d 515, 524, 740 P.2d 829 (1987); *see also*, *State v. Hightower*, 36 Wn. App. 536, 541, 676 P.2d 1016, *review denied*, 101 Wn.2d 1013 (1984) ("[T]here is clearly no constitutional right to hybrid representation in this state where the rights in question are granted in the disjunctive.") (citing Const. art. I, § 22).

Here, Williams was represented by competent counsel at his resentencing hearing. *See* 4RP 3-10; CP 41-100 (counsel's sentencing memorandum). Williams did not request to proceed pro se, and he had no right to "hybrid" representation whereby he acted as co-counsel with his attorney. *DeWeese*, 117 Wn.2d at 379; *Bebb*, 108 Wn.2d at 524. When a defendant is represented by competent counsel, the attorney has the ultimate authority in deciding which *legal* arguments to advance. *State v. Bergstrom*,

162 Wn.2d 87, 95, 169 P.3d 816 (2007). As a result, represented defendants have no constitutional right to file pleadings with the trial court. *State v. Blanchey*, 75 Wn.2d 926, 938, 454 P.2d 841 (1969).

Williams filed a written pleading requesting an exceptional mitigated sentence while he was represented by counsel. CP 122-128. In the pleading, Williams relied on both caselaw and statutory authority in support of his request. *Id.* A trial court is vested with the discretion to decline to consider pro se motions filed by a defendant while the defendant is represented by competent counsel. *In re Pers. Restraint of Quinn*, 154 Wn. App. 816, 841, 226 P.3d 208 (2010) (citing *Bergstrom*, 162 Wn.2d at 97). Thus, the trial court in this case was not required to consider the legal arguments raised by Williams in his pro se sentencing memorandum. *See also*, *State v. Thompson*, 169 Wn. App. 436, 494, 290 P.3d 996 (2012) (trial court has no duty to rule on pro se motions filed by a defendant who is represented by an attorney). Williams's own competent counsel

provided the trial court with the appropriate legal authority in support of its sentencing recommendation. CP 41-45; 4RP 5-10.

This does not mean that Williams was denied his right to address the trial court at sentencing and present mitigating information, as Williams suggests in his petition for review. While the legal arguments were for defense counsel to make, Williams had every opportunity to provide the court with information regarding his personal circumstances and argue for leniency. As further argued above, Williams addressed the trial court at length before he was sentenced. Williams's statutory right of allocution was not violated.

Williams argues that the Court of Appeals decision in this case "offends the statutory right to allocute" and "potentially deprives every criminal defendant the right to allocute for a mitigated sentence *unless* he elects to proceed pro se at sentencing." Pet. Rev. at 8 (emphasis in original). The decision does no such thing. The Court of Appeals decision merely recognizes that a trial court is not obligated to consider *legal*

motions and memoranda filed by a defendant who is represented by competent counsel. A criminal defendant remains free to present any mitigating information at sentencing, request leniency, and give argument as to the sentence to be imposed. Williams did not argue for a particular sentence, but he was given the opportunity to do so, and he presented mitigating information for the court's consideration. The Court of Appeals did not hold that a defendant must proceed pro se to advocate for himself at sentencing. *See* Pet. Rev. at 9. What the Court of Appeals did hold, in accordance with this Court's decisions in *DeWeese*, *Bebb*, and *Blanchey*, is that a defendant is not entitled to file legal pleadings when represented by counsel.

The Court of Appeals found the trial court was not required to consider Williams's legal arguments in his pro se sentencing memorandum. This decision does not conflict with a decision of this Court under RAP 13.4(b)(1) and does not involve an issue of substantial public interest under RAP 13.4(b)(4). This Court should therefore deny review.

3. The trial court properly exercised its discretion when it imposed the standard range sentence requested by defense counsel.

Even if the trial court was required to consider Williams's pro se request for an exceptional mitigated sentence, mentioned only in his written sentencing memorandum, the record shows the trial court did consider that request when it read the memorandum, listened to Williams's allocution, and then imposed sentence.

Under the Sentencing Reform Act of 1981 (SRA), a sentencing court must generally impose a sentence within the standard range. RCW 9.94A.505(2)(a)(i); *see State v. Graham*, 181 Wn.2d 878, 882, 337 P.3d 319 (2014). A standard range sentence "shall not be appealed." RCW 9.94A.585(1); *see* CP 15. "However, this prohibition does not bar a party's right to challenge the underlying legal conclusions and determinations by which a court comes to a particular sentencing provision. Thus, it is well established that appellate review is still available for the correction of legal errors or abuses of discretion in the

determination of what sentence applies." *State v. Williams*, 149 Wn.2d 143, 147, 65 P.3d 1214 (2003) (internal citations omitted).

The trial court may impose an exceptional sentence below the standard range if it finds mitigating circumstances by a preponderance of the evidence. RCW 9.94A.535(1). "While no defendant is entitled to an exceptional sentence below the standard range, every defendant is entitled to ask the trial court to consider such a sentence and to have the alternative actually considered." *State v. Grayson*, 154 Wn.2d 333, 342, 111 P.3d 1183 (2005). The defendant bears the burden of proving there are substantial and compelling reasons justifying an exceptional sentence below the standard range. RCW 9.94A.535(1); *see State v. Ramos*, 187 Wn.2d 420, 434, 387 P.3d 650 (2017).

A sentencing court's decision to deny an exceptional sentence is reviewed for abuse of discretion. *State v. McGill*, 112 Wn. App. 95, 100, 47 P.3d 173 (2002). A defendant may not appeal the imposition of a standard range sentence unless the

court categorically refuses to exercise its discretion or denies an exceptional sentence based on impermissible reasons. *Grayson*, 154 Wn.2d at 341-42; *McGill*, 112 Wn. App. at 99-100.

A court abuses its discretion when it denies an exceptional sentence based on an incorrect belief that it is not authorized to grant the sentence. *State v. O'Dell*, 183 Wn.2d 680, 696-97, 358 P.3d 359 (2015). The failure to consider an exceptional sentence authorized by law is an abuse of discretion subject to reversal. *Grayson*, 154 Wn.2d at 342. However, "[w]hen a court has considered the facts and concluded there is no legal or factual basis for an exceptional sentence, it has exercised its discretion, and the defendant cannot appeal that ruling." *McGill*, 112 Wn. App. at 100.

Here, Williams challenged his standard range sentence on the basis that the trial court allegedly abused its discretion by failing to consider his "youthful characteristics" as a mitigating factor for an exceptional downward sentence. To the extent the trial court was required to consider Williams's pro se request for

an exceptional sentence, the record indicates the court did just that when it read Williams's submitted materials, listened to his allocution, and then imposed sentence.

A defendant's youth is a possible mitigating factor for a court to consider when deciding whether to impose an exceptional sentence. *O'Dell*, 183 Wn.2d at 689. *See also*, RCW 9.94A.535(1)(e). However, "age is not a per se mitigating factor automatically entitling every youthful defendant to an exceptional sentence." *O'Dell*, 183 Wn.2d at 695.

In *O'Dell*, the defendant had just turned 18 when he had sex with a 12-year-old girl. 183 Wn.2d at 683. A jury convicted him of second degree rape of a child. *Id.* at 684. At sentencing, O'Dell's counsel asked the court to impose an exceptional sentence below the standard range, because O'Dell's youthfulness impacted his ability to appreciate the wrongfulness of his conduct. *Id*. at 685. The trial court ruled that it could not consider age as a mitigating circumstance, because O'Dell was a legal adult. *Id*. This Court held that the trial court abused its

discretion, because it erroneously believed that it could not consider youth as a mitigating factor and therefore failed to consider whether O'Dell's youth impacted his culpability. *Id*. at 689, 696-97.

Here, Williams was 19 years old at the time he committed his offense. CP 110; 4RP 8. Defense counsel asked the court to consider his youth in imposing a standard range sentence, and in his pro se sentencing memorandum, Williams asked the court to consider his youth in imposing an exceptional sentence downward.

Unlike in *O'Dell*, the trial court did not categorically refuse to exercise its discretion to impose an exceptional sentence. It did not deny an exceptional sentence based on impermissible reasons. And nothing in the record indicates that the court believed it was prohibited from considering youthfulness as a mitigating factor. The trial court considered any motion for an exceptional sentence when it read Williams's written pleading and heard his allocution. *See* 4RP 9, 15 (court

notes it read Williams's statement). The court implicitly denied Williams's pro se request when it imposed the standard range sentence.

Because the trial court considered the facts and concluded there was no basis for an exceptional sentence, it exercised its discretion, and Williams cannot appeal that ruling. *McGill*, 112 Wn. App. at 100. A trial court is not required to impose an exceptional sentence for every "youthful" offender. *See O'Dell*, 183 Wn.2d at 695. Defense counsel asked the court to take Williams's youth into consideration in imposing the low end of the standard range, and the court did just that. The trial court did not abuse its discretion in imposing the standard range sentence requested by defense counsel. Therefore, this Court should deny review.

V. CONCLUSION

Williams fails to show review is warranted under RAP 13.4(b)(1) and (4). For the reasons set forth above, the State respectfully requests this Court deny review.

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RESPECTFULLY SUBMITTED this 3rd day of November, 2021.

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11-3-21	*s/Therese Kahn*
Date	Signature

PIERCE COUNTY PROSECUTING ATTORNEY

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