No. 101632-8

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Petitioner,

v.

JEFFREY COOK,

Respondent.

ANSWER IN OPPOSITION TO PETITION FOR REVIEW

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A. INTRODUCTION

The State seeks review of an unpublished opinion addressing a trial court's admission of evidence under ER 404(b). The Court of Appeals applied settled law to the facts, and the government's petition meets none of the criteria set out in RAP 13.4(b).

The prosecutor is clearly upset and liberally employs italics and boldface to convey his anger. But the State's displeasure regarding the Court of Appeals' error correction is not a reason for review. There is no conflict, no constitutional issue, and no matter of substantial public interest.

This Court should hold the government to the same standard other litigants are required to meet. Because the petition meets none of the criteria of RAP 13.4(b), this Court should deny review.

B. ISSUES

1. Should this Court deny review because the Court of Appeals applied settled law to the facts and issued an

unpublished opinion holding that the prior acts at issue were inadmissible under ER 404(b) to show common scheme or plan, intent, or absence of mistake or accident?

2. If this Court grants the State's petition for review, should it also review the sentencing issue and the issues in the consolidated personal restraint petition that the Court of Appeals did not reach?

C. STATEMENT OF THE CASE

Jeffrey Cook sustained a traumatic brain injury when he was three years old, resulting in temporary paralysis, permanent vision problems, and a "frontal lobe disorder." CP 171. As an adult, he worked in the construction industry and suffered numerous compressed discs in his spinal cord. *Id.* The compressed discs led to spinal myoclonus and debilitating seizures. *Id.* He regularly experiences blackouts, apparently caused by either his original injury or the many medications he must take to alleviate seizures. CP 171. But he continued

working to the best of his ability, most recently helping his landlord rebuild houses. RP 27, 42, 1613-14, 1625.[1]

Unfortunately, Mr. Cook also has some experience in the criminal justice system. In the fall of 2018, the Snohomish County Prosecutor's Office charged Mr. Cook with first-degree child molestation based on an incident that occurred at the Ranch 99 Market in Edmonds. CP 449. Ten-year-old J. L. alleged that a man fitting Mr. Cook's description touched her vagina over her clothing for one or two seconds as he moved past her in the crowded seafood aisle. CP 444; RP 1176-86, 1204. Police arrested Mr. Cook based on tips they received after releasing surveillance video. CP 445; RP 1734, 1745.

During pretrial motions, the prosecution asked the court to admit evidence of two prior bad acts of Mr. Cook: a 2016

[1] "RP" refers to the verbatim reports of proceedings filed by the primary court reporter, Sheralyn Barton. Other court reporters transcribed a few dates and each restarted the pagination at "1." Mr. Cook will cite those transcripts as "RP (date)."

incident during which Mr. Cook allegedly molested a girl briefly over her clothing, and a 2017 incident in which Mr. Cook told a girl he could "take [her] panties off" and "play with [her] pussy," resulting in a conviction for the misdemeanor of communicating with a minor for immoral purposes. Pretrial Exs. 1-5; RP (12/18/19) 41-195; RP 372-87, 477-78, 941-70; CP 452. The State acknowledged ER 404(b) prohibits admission of propensity evidence, but argued the court should admit evidence of these other acts to show identity, common scheme or plan, purpose of sexual gratification, and absence of mistake or accident. RP (12/18/19) 154. The prosecutor insisted the acts demonstrated Mr. Cook had devised a plan to molest Asian girls in public places. RP (12/18/19) 151-54.

Defense counsel opposed admission of these incidents on the basis that they did not satisfy the rules associated with these proffered purposes, that they were relevant only for the improper purpose of demonstrating a propensity to commit child molestation, and that their admission would be

substantially more prejudicial than probative. CP 322-28, 342-49, 384-92; RP (12/18/19) 166-83; RP 375-83. Counsel observed, "admitting [these acts] in front of the jury will inevitably cause them to conclude that this is a pattern and that Mr. Cook has the propensity to do this, which is exactly the notion that they're not supposed to take this for." RP 379. Thus, "the admission of this evidence is simply going to eviscerate my client's right to a fair trial." RP 380.

The court nevertheless admitted evidence of these prior acts to show common scheme or plan, a purpose of sexual gratification, and absence of mistake or accident. RP 941-70; CP 452. In so doing, the court relied heavily on the fact that each of the girls "appeared to be or was Asian." RP 948. Instead of addressing the prejudice caused by the propensity inference, the court concluded admission of the evidence would not be unfairly prejudicial because the acts were not violent. RP 957-58.

The prosecution focused on the 2016 and 2017 incidents during the trial for the 2018 charge. In opening statements, the prosecutor described the prior bad acts, and emphasized that the girls in each incident were Asian. RP 983-84. The State called as its first witness the girl from the 2017 case, and called as its second witness an eyewitness of the 2016 incident. RP 990-1050, 1055-1108. A police officer who responded to the 2016 incident also testified. RP 1146-76.

J. L. testified about the 2018 incident for which Mr. Cook was actually on trial, and she stated that a man touched her vagina over her clothing for one or two seconds. RP 1176-86, 1204. The State also presented surveillance video and testimony of officers who arrested Mr. Cook. Exs. 15A, 16A; RP 1591-1652, 1732-77. In urging the jury to convict Mr. Cook of the 2018 charge, the prosecutor highlighted the 2016 and 2017 incidents at the end of closing argument and the end of rebuttal closing argument. RP 2125-28, 2173-75.

The jury found Mr. Cook guilty, and he filed a motion for a new trial based on the ruling admitting the 2016 and 2017 incidents under ER 404(b). CP 217-37. At the hearing on the motion, the State admitted Mr. Cook had two prior convictions for molesting "a white female," which the prosecutor had not mentioned at the ER 404(b) hearing. RP (6/22/20) 47-48. The judge expressed surprise, stating, "I didn't even know that existed[.]" RP (6/22/20) 47-48. Although both the prosecutor and the court had relied on the race of the alleged victims to support admission of prior acts for the purpose of showing a common scheme or plan, the court denied the motion for a new trial after learning of a case involving a white girl. RP 49.

At sentencing, the court calculated an offender score of six based on the two prior Georgia convictions for child molestation, each of which counted as three points. CP 13, 101-128, 187-90. The court included these convictions in the offender score even though Georgia's child molestation statute, unlike Washington's, criminalizes mere "immoral" acts "in the

presence of" a child, and also does not require proof of non-marriage as Washington's statute did at the time. Ga. Code Ann. § 16-6-4 (a) (West); RCW 9A.44.089. The court sentenced Mr. Cook to a minimum of ten years and a maximum of life in prison. CP 15.

On appeal, Mr. Cook argued that his conviction should be reversed and the case remanded for a new trial because of the improper admission of prejudicial propensity evidence under ER 404(b). He argued in the alternative that he was entitled to resentencing because neither of the two prior convictions used in the offender score were comparable to a Washington crime. The prosecution protested that the prior acts were admissible, but it conceded that one of the two prior convictions should not have been included in the offender score.

Mr. Cook also filed a personal restraint petition (PRP), in which he argued that he was deprived of his constitutional right to the effective assistance of counsel in several respects. The

Court of Appeals consolidated the direct appeal and the PRP, and appointed counsel on the PRP. Counsel raised several distinct claims of ineffective assistance of counsel in the supplemental brief.

In an unpublished opinion, the Court of Appeals reversed the conviction and remanded for a new trial based on the improper admission of evidence of prior acts under ER 404(b). The court recognized that the prior acts were not sufficiently similar to constitute a common scheme or plan, and that the only way they proved intent or absence of mistake was through a forbidden propensity inference.

Because the court reversed for the improper admission of prior acts evidence, the court did not reach the remaining issues. A concurring judge noted that if Mr. Cook is again convicted after a new trial, neither of his two Georgia convictions may be counted in his offender score.

The State filed a petition for review, arguing this Court should reverse the Court of Appeals on the ER 404(b) issue.

D. ARGUMENT

1. This Court should deny review because the petition meets none of the criteria of RAP 13.4(b).

a. RAP 13.4(b) limits the cases appropriate for this Court's review to cases presenting a conflict, cases raising a constitutional issue, or cases implicating a substantial public interest.

RAP 13.4(b) limits the cases appropriate for this Court's review. The rule provides:

> A petition for review will be accepted by the Supreme Court only:
>
> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or
>
> (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or
>
> (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or
>
> (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

RAP 13.4(b) (emphasis added).

The State's petition meets none of these criteria. The case does not meet either of the first two criteria because there is no conflict. Far from disagreeing with prior cases, the Court of appeals applied this Court's cases and its own cases to address the issues presented.

Nor does subsection (3) apply. There is no constitutional issue; instead, the prosecution merely complains about the court's ruling under Evidence Rule 404(b).

Finally, there is no issue of substantial public interest warranting review under subsection (4). The Court of Appeals simply applied existing law to the facts. The opinion is not published, not binding, and not of interest to anyone other than the litigants in this case.

b. <u>The Court of Appeals properly applied settled law to the facts in addressing the non-constitutional issue presented.</u>

This Court is not an error-correction court, and in any event, the Court of Appeals properly applied settled law to the facts in reversing under ER 404(b).

i. ER 404(b) prohibits admission of prior bad acts to prove action in conformity therewith.

ER 404(b) provides:

> Evidence of other crimes, wrongs, or acts is not admissible to prove the character of a person in order to show action in conformity therewith. It may, however, be admissible for other purposes, such as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident.

The "forbidden inference" of propensity to act in conformity with prior acts "is rooted in the fundamental American criminal law belief in innocence until proven guilty, a concept that confines the fact-finder to the merits of the current case in judging a person's guilt or innocence." *State v. Wade*, 98 Wn. App. 328, 336, 989 P.2d 576 (1998).

"A trial court must always begin with the presumption that evidence of prior bad acts is inadmissible." *State v. DeVincentis*, 150 Wn.2d 11, 17, 74 P.3d 119 (2003). The State bears the burden of demonstrating a proper purpose for admitting evidence of a defendant's prior bad acts. *Id.* at 17.

Courts must "resolve any doubts on whether to admit the evidence in the defendant's favor." *State v. Fuller*, 169 Wn. App. 797, 829, 282 P.3d 126 (2012).

Although prior acts may be admitted to show a "common scheme or plan," evidence is not admissible for this purpose unless the prior acts and the current alleged act are "markedly similar." *DeVincentis*, 150 Wn.2d at 19 (citing *State v. Lough*, 125 Wn.2d 847, 856, 889 P.2d 487 (1995)). Nor may a court admit prior acts to show "intent" or "absence of mistake or accident" if "the evidence would merely show [the defendant's] predisposition toward molesting children." *State v. Sutherby*, 165 Wn.2d 870, 886, 204 P.3d 916 (2009) (discussing "absence of mistake or accident"); *see also Wade*, 98 Wn. App. at 334 ("When the State offers evidence of prior acts to demonstrate intent, there must be a logical theory, *other than propensity*, demonstrating how the prior acts connect to the intent required to commit the charged offense.").

ii. The Court of Appeals properly held the prior acts were not admissible to show common scheme or plan because the acts were not markedly similar.

The Court of Appeals correctly held the prior acts were inadmissible to show common scheme or plan because the acts were not markedly similar. In so holding, the court complied with this Court's opinions in *DeVincentis* and *Lough*, and with its own opinions in *Wilson* and *Slocum.*

The common scheme or plan exception to the prohibition on prior acts evidence applies only when the acts share "such occurrence of common features that the various acts are naturally to be explained as caused by a general plan of which the charged crime and the prior misconduct are the individual manifestations." *Lough,* 125 Wn.2d at 860. "[C]aution is called for in application of the common scheme or plan exception as defined in *Lough*." *DeVincentis*, 150 Wn.2d at 18 (citation omitted). The State's burden to prove this exception is "substantial." *Id.* at 17. The State must show the defendant "committed *markedly similar* acts of misconduct against similar

victims under similar circumstances." *Id.* at 19 (quoting *Lough*, 125 Wn.2d at 856) (emphasis added).

Here, the prior acts were not markedly similar. The 2017 incident involved a statement but no touching. Pretrial Ex. 2. The 2018 incident for which Mr. Cook was on trial involved an allegation of touching with no statement. CP 444, 449. The Court of Appeals properly concluded that the prior incident was inadmissible under *State v. Wilson*, 1 Wn. App. 2d 73, 404 P.3d 76 (2017).[2] There, the court reversed convictions for rape of a child and attempted rape of a child where the trial court had erroneously admitted defendant's "sexually-oriented remark" to another child under the "common scheme or plan" exception. *See id.* at 80-82.

[2] Although Mr. Cook cited *Wilson* in his opening brief and the Court of Appeals cited it in its opinion, the State failed to address or even cite *Wilson* in either its response brief or its motion to reconsider. The State acknowledges *Wilson* for the first time in its petition for review.

The 2016 incident was also not markedly similar. It did not take place in an Asian market, involved a girl who was much younger, and involved a touching on the backside rather than on the vagina as alleged in this case. Pretrial Ex. 1; RP (12/18/19) 90. As the Court of Appeals recognized, the prior act was inadmissible under *State v. Slocum*, 183 Wn. App. 438, 333 P.3d 541 (2014).[3] There, the State charged the defendant with first-degree child molestation and third-degree rape of his step-granddaughter after the child alleged Slocum "would call her over to sit in his lap" in his recliner and touch her vagina and breasts. *Slocum*, 183 Wn. App. at 443-44. At trial, the prosecutor sought admission of three prior acts under ER 404(b): two acts of molestation against the victim's mother

[3] Like *Wilson*, the State failed to address *Slocum* in its response brief even though Mr. Cook cited it extensively. The State again does not acknowledge *Slocum* in its petition for review—if it acknowledged the case it would have to concede its petition does not satisfy RAP 13.4(b)(2).

when she was a child, and one act of molestation against the victim's aunt when she was a child. *Id.* at 443-45.

The mother stated that when she was the same age as her daughter, the defendant once molested her on the floor of the T.V. room and once molested her after asking her to sit in his lap in a recliner. *Id.* at 445. The aunt stated that when she was the same age, the defendant offered to help her apply sunscreen and molested her in the process of doing so. *Id.* at 446.

The trial court admitted the three prior acts for the purpose of showing a common scheme or plan, but the Court of Appeals reversed. *Id.* at 446, 448-57. The court held the trial court erred in admitting the two acts of molestation that did not take place in a recliner, because they were not "markedly similar" as required under this Court's case law. *Id.* at 450-56. This was so even though all three victims were young girls, all three were related to the defendant by marriage, all of the incidents occurred in the defendant's home, and the defendant

committed all of the crimes in a manner that reduced the likelihood of being caught. *Id.* at 444. The court emphasized:

> If the State views this as an unreasoned distinction, we remind it that the question to be answered in applying ER 404(b) is not whether a defendant's prior bad acts are logically relevant—they are. Evidence that a criminal defendant is a "criminal type" is relevant. But ER 404(b) reflects the long-standing policy of Anglo-American law to exclude most character evidence because "it is said to weigh too much with the jury and to so overpersuade them.... The overriding policy of excluding such evidence, despite its admitted probative value, is the practical experience that its disallowance tends to prevent confusion of issues, unfair surprise and undue prejudice."

Slocum, 183 Wn. App. at 456 (internal citation omitted).

The Court of Appeals properly applied *Slocum* and *Wilson* in reversing Mr. Cook's conviction.

Moreover, in Mr. Cook's case the trial court improperly relied on race in its analysis, speculating that people who shop in Asian markets are immigrants who don't understand English, and that Mr. Cook had some sort of notable "sexual preference for Asian girls." RP 948-49; *see* Br. of Appellant at 21-23. The

prosecutor, too, emphasized Mr. Cook's supposed penchant for Asian girls as a theme at trial. Slip Op. at 18, n. 8.

Contrary to the trial court's ruling and the prosecution's theme, the alleged victim in this case was fluent only in English. RP 1178. Contrary to the trial court's ruling and the prosecution's theme, Mr. Cook's only prior convictions for the crime alleged here were for crimes against a white girl. RP (6/22/20) 47-48. It was not until after the State secured a guilty verdict that it revealed the existence of these prior convictions to the judge. At a hearing on Mr. Cook's motion for a new trial, the prosecutor admitted Mr. Cook had two prior convictions for molesting "a white female in a similar setting," which the prosecutor had not mentioned at the ER 404(b) hearing "because in that case it was not a young Asian female." RP (6/22/20) 47.[4]

[4] The State claims it did not do anything wrong in withholding this information from the trial court, and that if defense counsel wanted to bring the prior convictions for crimes against a white girl to the court's attention, they could

Contrary to the trial court's ruling and the prosecution's theme, the race of the girls was not notable unless one adopts a white normative view of the world. In other words, the State cannot seriously suggest it would have emphasized the girls' race had they all been white. Instead, the prosecution and the trial court assumed that white is the norm, that a white person who touches an Asian girl must have a notable fetish, and that people in an Asian market are foreign and do not speak English. These assumptions are offensive and improper bases for a finding of common scheme or plan. Br. of Appellant at 21-23; Reply Br. of Appellant at 13-15.[5]

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have done so. But the State bears the burden of proving the admissibility of prior acts evidence and the burden of proving the offender score at sentencing. Defense counsel does a disservice to the client if they present evidence of prior convictions. The State should not have withheld the information in order to support its race-based theme, and the trial court should not have indulged racial stereotypes when admitting the prior acts evidence.

[5] The prosecutor went so far as to state that Mr. Cook's mere *comment* to an Asian girl was more similar to the current alleged sexual molestation than *an actual sexual molestation* of a white girl. RP (6/22/20) 47.

While the invocation of racial stereotypes by the trial court and prosecution may pique this Court's interest, this Court should refrain from rewarding the State for its malfeasance by granting its petition for review. The Court of Appeals properly reversed, and the case should be remanded immediately for a new trial. This Court should deny review.

iii. The Court of Appeals properly held the prior acts were not admissible to show a purpose of sexual gratification and absence of mistake or accident because the prior acts only showed these purposes through an improper propensity inference.

The Court of Appeals also properly recognized that the prior acts did not show intent and absence of mistake or accident except through a forbidden propensity inference.

While intent can be a proper purpose for admitting prior acts evidence, "there must be a logical theory, *other than propensity*, demonstrating how the prior acts connect to the intent required to commit the charged offense." *Wade*, 98 Wn.

App. at 334 (emphasis in original). The same is true for absence of mistake or accident. *Sutherby*, 165 Wn.2d at 886.

As trial counsel noted, the only way Mr. Cook's prior acts demonstrated a sexual purpose or absence of mistake or accident was through a forbidden propensity inference. The prior acts showed that because Mr. Cook made a sexual statement to a girl in Seattle and touched a girl's private parts in Georgia, he must be sexually attracted to children and must have touched J. L. for the purpose of sexual gratification.

In *Wade*, the Court of Appeals reversed where two prior acts were improperly admitted to show intent. *Wade*, 98 Wn. App. at 333-37. The State had charged the defendant with possession with intent to deliver cocaine after the defendant dropped a baggie of drugs and ran from a police officer. *Id.* at 332. The trial court admitted evidence of two prior acts of drug dealing to show the defendant intended to deliver the cocaine he discarded. *Id.* The Court of Appeals reversed because, although the prior acts were relevant to show intent, their relevance was

predicated on a propensity inference. *Id.* at 334-36. The court explained, "Using Wade's prior bad acts to prove current criminal intent, however, is tantamount to inviting the following inference: Because Wade had the same intent to distribute drugs previously, he must therefore possess the same intent now. ER 404(b) forbids such inference because it depends on the defendant's propensity to commit a certain crime." *Wade*, 98 Wn. App. at 336.

The Court of Appeals correctly applied *Wade* here. Using Mr. Cook's prior bad acts to prove current sexual purpose was tantamount to inviting the inference that because Mr. Cook had a purpose of sexual gratification previously, he must therefore have possessed the same purpose during the Edmonds incident. ER 404(b) forbids this inference. *Wade*, 98 Wn. App. at 336.

In *Sutherby*, this Court applied the same principle to the "absence of mistake or accident" exception. The Court held defense counsel should have moved for severance of child pornography charges from child rape and molestation charges

because the former would not have been admissible in a trial on the latter. *Sutherby*, 165 Wn.2d at 883-86. While the State argued the child pornography charges would have been admissible to prove absence of mistake or accident, this Court held this would be true only if the charges involved the same victim. *Id.* at 886. Otherwise, "the evidence would merely show Sutherby's predisposition toward molesting children and is subject to exclusion under ER 404(b)." *Id.* The Court of Appeals properly reached the same conclusion in this case.

In sum, the Court of Appeals properly applied its own cases and this Court's cases to address the evidentiary issue in this case. There is no conflict, no constitutional question, and no issue of substantial public interest. This Court should deny review. RAP 13.4(b).

2. If this Court grants review of the ER 404(b) issue, it should also review the sentencing issue and the issues raised in the consolidated personal restraint petition.

Because the Court of Appeals reversed for the ER 404(b) violation, it did not reach the other issues in the case. If this Court grants the State's petition for review on the ER 404(b) issue, it should also review the other issues presented.

First, in his direct appeal, Mr. Cook argued in the alternative that he was entitled to resentencing because the only two prior convictions in his offender score were Georgia convictions for crimes that were not comparable to a Washington crime. The State conceded error as to one of the two crimes but not the other. A concurring judge in the Court of Appeals noted that if Mr. Cook is convicted after retrial, neither Georgia conviction may be included in the offender score. But the majority did not reach the issue, so this Court should do so if it grants the State's petition.

Second, in a consolidated personal restraint petition, Mr. Cook argued he was deprived of his constitutional right to the effective assistance of counsel because his trial attorney failed to suppress evidence obtained via an overbroad warrant, failed to present a diminished capacity defense, and highlighted prejudicial evidence during closing argument. The Court of Appeals did not reach these issues, so this Court should do so if it grants the State's petition.

E. CONCLUSION

The petition meets none of the criteria under RAP 13.4(b). This Court should deny review.

This brief uses 14-point Times New Roman and contains approximately 4392 words (word count by Microsoft Word).

Respectfully submitted this 9th day of May, 2023.

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The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original of the document to which this declaration is affixed/attached, was filed in the **Washington State Supreme Court** under **Case No. 101632-8**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

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