Supreme Court No. 101866-5
(COA No. 83393-6-I)

THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

THEOPHILUS WILLIAMSON,

Petitioner.

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

PETITION FOR REVIEW

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A. IDENTITY OF PETITIONER

Theophilus Williamson, petitioner here and appellant below, asks this Court to accept review of the Court of Appeals decision terminating review under RAP 13.3 and RAP 13.4.

B. COURT OF APPEALS DECISION

Mr. Williamson seeks review of the Court of Appeals decision dated March 6, 2023, a copy of which is attached as an appendix.

C. ISSUE PRESENTED FOR REVIEW

Whether the excessive fines clauses of the federal and state constitutions require a sentencing court to examine proportionality before imposing the victim penalty assessment.

D. STATEMENT OF THE CASE

Although initially charged with second-degree assault, the jury only found that Mr. Williamson had

committed the lesser included charge of fourth-degree assault. CP 53, RP 937. The underlying facts are not critical to this petition for review.

At sentencing, the court imposed the victim penalty assessment. CP 90. It made no finding concerning whether Mr. Williamson could pay the victim penalty assessment, nor did it conduct a proportionality analysis.

Relying on *State v. Curry*, 118 Wn.2d 911, 829 P.2d 166 (1992) and its analysis of due process and the equal protection clause, the Court of Appeals declined to address whether this Court's opinion in *State v. Long*, 198 Wn.2d 136, 173, 493 P.3d 94 (2021), requires a trial court to examine excessiveness and proportionality before imposing the victim penalty assessment. App. 5.

E. ARGUMENT

In *Long*, this Court recognized that sentencing courts must "pay more than 'lip service' to the excessive fines clause and instead hew to its history." *Long*, 198 Wn.2d at 173. To comply with the excessive fines clause, the court must consider a person's ability to pay. *Id*. (citing *Colorado Dep't of Labor & Emp't v. Dami Hosp*., LLC, 442 P.3d 94, 101 (Colo. 2019)). Because the victim penalty assessment does not provide the sentencing court with an opportunity to address proportionality and provides no exception for the ability to pay, this Court should accept review to find its application unconstitutional.

1. This Court has not reviewed whether the excessive fines clause applies to the victim penalty assessment.

Relying on *Curry*, the Court of Appeals has held that the victim penalty assessment is constitutional.

App. 5 (citing *State v. Tatum*, 23 Wn. App. 2d 123, 130, 514 P.3d 763 (2022)). But even in *Tatum*, the Court of Appeals cannot address why it is constitutional, recognizing that "Curry's reasoning is vague; it does not state precisely what constitutional arguments it took into account." *Tatum*, 23 Wn. App. 2d at 130.

There is a reason why this did not address the excessive fines clause in *Curry*: it was not the issue raised by the parties. The briefing in *Curry* makes it clear that the issue was about equal protection and due process, not the excessive fines clause. Supp. Br. of Pet'rs, State v. Curry, No. 58752-3, 1992 WL 12561847, at *1 (Mar. 10, 1992).

As such, the Court of Appeals misapprehends *Curry*. Futher, the Court of Appeals will not address the excessive fine clause issue until the Court addresses it. See App. 5. Instead, the Court of Appeals

explains that it is bound by *Curry* until this issue is addressed by this Court, even though *Curry* does not address the excessive fines argument. *Tatum*, 23 Wn. App. 2d at 130 (citing *State v. Gore*, 101 Wn.2d 481, 487, 681 P.2d 227 (1984)).

Because this Court has never addressed whether the excessive fines clause requires a proportionality analysis before the victim penalty assessment is imposed, a significant question of law under the state and federal constitutions, and an issue of substantial public importance, this Court should accept review here. RAP 13.4(b).

2. The victim penalty assessment violates the excessive fines clause.

Article I, section 14 of the Washington Constitution prohibits the imposition of "excessive fines." Const. art. I, § 14; *Long*, 198 Wn.2d at 158. The Eighth Amendment also prohibits "excessive fines."

U.S. Const. amend. VIII. This prohibition is incorporated against the States under the Fourteenth Amendment. U.S. Const. amend. XIV; *Timbs v. Indiana*, ___ U.S. ___, 139 S. Ct. 682, 687, 203 L. Ed. 2d 11 (2019).

The federal and state excessive fines clause limits the government's power to require payments as punishment for an offense. *Austin v. United States*, 509 U.S. 602, 609-10, 113 S. Ct. 2801, 125 L. Ed. 2d 488 (1993) (citing *Browning-Ferris Indus. of Vt., Inc. v. Kelco Disposal, Inc.*, 492 U.S. 257, 265, 109 S. Ct. 2909, 106 L. Ed. 2d 219 (1989)). A fine is excessive if it is "grossly disproportional to the gravity of the defendant's offense." *Long*, 198 Wn.2d at 162 (quoting *United States v. Bajakajian*, 524 U.S. 321, 334, 118 S. Ct. 2028, 141 L. Ed. 2d 314 (1998)).

This Court has not yet analyzed whether the excessive fines clause applies to the victim penalty assessment, contrary to the Court of Appeals' view. App. 5. However, it has repudiated the basis for imposing such fees when a person cannot pay. *Long*, 198 Wn.2d at 162. Review should be granted because the Court of Appeals' decision conflicts with this Court's analysis of how the excessive fines clause applies to other government-imposed fees. RAP 13.4(b).

3. The victim penalty assessment is punitive.

If a fine has any punitive characteristics, it must be considered a punishment for the purpose of the excessive fines clause. *Timbs*, 139 S. Ct. at 689; Austin, 509 U.S. at 621. Arguably, this Court need look no further than the title of victim penalty assessment to determine that it is punitive. Beyond its plain intent, however, there is support for this conclusion. A fee or

fine that is not solely remedial is punishment. *Bajakajian*, 524 U.S. at 332; *Long*, 198 Wn.2d at 163-64 (citing *Tellevik v. 6717 100th Street S.W.*, 83 Wn. App. 366, 376-77, 921 P.2d 1088 (1996)).

Where the court imposes a fine to finance a state operation, "it makes sense to scrutinize governmental action more closely." *Harmelin v. Michigan*, 501 U.S. 957, 979, n. 9, 111 S. Ct. 2680, 115 L. Ed. 2d 836 (1991) (Scalia, J.). The victim penalty funds "comprehensive programs to encourage and facilitate" testimony. *State v. Conway*, 8 Wn. App. 2d 538, 555, 438 P.3d 1235 (2019). It is always imposed, regardless of whether there was a victim. RCW 7.68.035. These purposes show that the fee is not solely remedial.

The statute's language is also nearly identical to the language this Court determined to be partially punitive in *Long*. The plain language of the statute

shows that the penalty assessment is punitive. RCW 7.68.035 requires the victim penalty assessment to be imposed "in addition to any other penalty or fine." This language mirrors the municipal code language reviewed in *Long*, where this Court determined that the plain language stating the impoundment fees were "in addition to any other penalty" showed that the impoundment fee was a penalty. 198 Wn.2d at 164.

In *Timbs*, the United States Supreme Court held that where forfeitures are partially punitive, they violate the Eighth Amendment excessive fines clause. 139 S. Ct. at 689. The Court acknowledged the toll excessive fines have on persons unable to pay them. *Id*. at 687. The Court further recognized that economic sanctions must "be proportioned to the wrong" and "not be so large as to deprive [an offender] of his livelihood."

Id. at 688 (citing *Browning-Ferris Industries of Vt., Inc.*, 492 U.S. at 271).

Nor can this Court ignore the historical realities of fines used "to subjugate newly freed slaves and maintain the prewar racial hierarchy." *Timbs*, 139 S. Ct. at 688; *Long*, 198 Wn.2d at 136. Increasingly, fines are employed "in a measure out of accord with the penal goals of retribution and deterrence," for "fines are a source of revenue," while other forms of punishment "cost a State money." *Harmelin*, 501 U.S. at 979, n. 9.

Following *Long* and *Timbs*, this Court should find the penalty assessment punitive. 198 Wn.2d at 163. The purpose of the penalty assessment is not to obtain compensation or indemnity but to fund the courts. This Court should accept review to apply the analysis as it

did in *Long* and hold that the victim penalty assessment is punitive.

4. The victim penalty assessment is grossly disproportionate.

A fine violates the excessive fines clause if it is grossly disproportional to the gravity of a defendant's offense. *Long*, 198 Wn.2d at 110-11 (citing *Bajakajian*, 524 U.S. at 336). "The touchstone of the constitutional inquiry under the Excessive Fines Clause is the principle of proportionality: The amount of the forfeiture must bear some relationship to the gravity of the offense that it is designed to punish." *Id.* (quoting *Bajakajian*, 524 U.S. at 334 (citing *Austin*, 509 U.S. at 622-23; *Alexander v. United States*, 509 U.S. 544, 559, 113 S. Ct. 2766, 125 L. Ed. 2d 441 (1993)).

In considering whether a fine is grossly disproportionate, this Court looks to "a person's ability to pay the fine," in addition to other factors. 198 Wn.2d

at 173. (citing *State v. Grocery Manufacturers Ass'n*, 195 Wn.2d 442, 476, 461 P.3d 334 (2020); *Dami Hosp.*, LLC, 442 P.3d at 101. Courts also examine the nature and extent of the crime; whether the violation was related to other illegal activities; the other penalties that may be imposed; the extent of the harm caused; and the person's ability to pay. *Long*, 198 Wn.2d at 174.

Applying this test, this Court found that the impoundment of a person's truck in which they were living and an assessment of $547.12 were excessive fines predominantly because of the person's inability to pay. *Long*, 198 Wn.2d at 174-75. This Court should similarly find that Mr. Williamson's fine was excessive under the Eighth Amendment. Mr. Williamson could not post his bail. He was found indigent at trial and on appeal. CP 94-95. Imposing a mandatory fine Mr.

Williamson could not pay was arbitrary and created enormous disproportionality.

"[The] weight of history and the reasoning of the Supreme Court demonstrate that excessiveness concerns more than just an offense itself; it also includes consideration of an offender's circumstances." *Long*, 198 Wn.2d at 171. And yet, without considering the ability to pay, almost every person convicted of a crime in superior court is assessed $500. This fee can have a devastating effect on re-entry. *State v. Blazina*, 182 Wn.2d 827, 837, 344 P.3d 680 (2015). The long-term involvement of the court in debt collection inhibits re-entry and can negatively affect employment, housing, and finances. *Id.* Legal financial obligation debt also affects credit ratings, making it more difficult to find secure housing. Katherine Beckett & Alexis Harris, State Minority & Justice Comm'n, *The*

Assessment And Consequences of Legal Financial Obligations In Washington State, 43 (2008).[1] These re-entry difficulties increase the likelihood of recidivism. *Id.* at 68. These difficulties persist for most persons convicted of crimes in Washington long after serving their time, as only a small percentage of persons can repay their assessed debt. *Id.* at 21.

In granting review, this Court should be mindful that funding the legal system on the backs of people experiencing poverty is grossly disproportionate. As such, it violates the excessive fines clauses of the state and federal constitutions. This Court should accept review of this matter to address this important constitutional question.

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[1] https://media.spokesman.com/documents/2009/05/study_LFOimpact.pdf

5. The state constitution provides greater protections than the federal constitution.

A complete analysis of the *Gunwall*[2] factors was presented to the Court of Appeals, which did not analyze whether the state constitution provides greater protection than the federal constitution. Should review be granted, Mr. Williamson will ask this Court to find that Article I, section 14 provides greater protection than the Eighth Amendment. Under a state constitutional analysis, this Court should find that the consideration of ability to pay is constitutionally required, as it found in *Long*. 198 Wn.2d at 170.

6. The victim penalty assessment has a debilitating effect on communities of color.

The racial disproportionality of blanket imposition of fines should concern this Court. In 2015,

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[2] *State v. Gunwall*, 106 Wn.2d 54, 720 P.2d 808 (1986).

the United States Department of Justice reported on excessive fines imposed in Ferguson, Missouri. Civil Rights Div., U.S. Dep't of Justice, *Investigation of the Ferguson Police Department*, 4-5 (Mar. 2015). The report concluded, "Ferguson's law enforcement practices [were] shaped on the City's focus on revenue rather than by public safety needs." *Id.* at 2. These findings were "not confined to any one city, state, or geographic region. They implicate questions about fairness and trust that are national in scope." U.S. Dep't of Justice, *Press Release, Attorney General Holder Delivers Update on Investigation in Ferguson*, Missouri (Mar. 4, 2015).

The Ferguson Report began a national conversation on how financial punishment is unfairly wielded, often against poor people of color, to fund the government. Daniel S. Harawa, *How Much Is Too*

Much? A Test to Protect Against Excessive Fines, 81 Ohio St. L.J. 65, 74 (2020) (citing Matthew Menendez, *Fines and Fees Justice Center Launches New Clearinghouse Featuring Brennan Center Work*, Brennan Ctr. for Just. (Jan. 8, 2019)). It exposed the underbelly of a justice system not often discussed: it revealed that punishment went hand-in-hand with revenue generation and detailed how such a system can corrupt the administration of justice for the first time on the national stage. *Id.*

This Court's commitment to examining issues of racial injustice has included an analysis of how disparate implementation of legal financial obligations unfairly impacts persons of color. *Long*, 198 Wn.2d at 172 (citing Richard Rothstein, *The Color of Law: A Forgotten History of How Our Government Segregated America* 64, 97-99 (2017)). Because the victim penalty

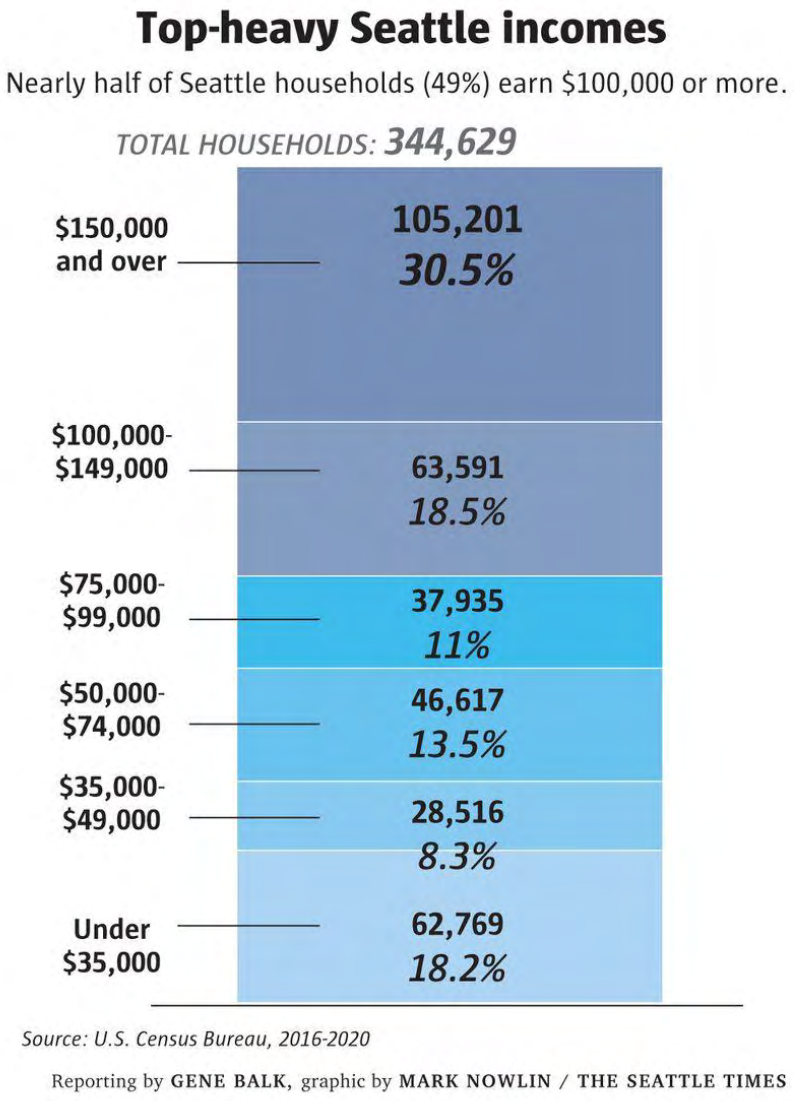
assessment is imposed in almost every case, this Court cannot look past its impact and how it perpetuates injustice.

7. The victim penalty assessment should only be imposed where a person can pay the fee.

Courts scrutinize "governmental action more closely when the State stands to benefit." *Long*, 198 Wn.2d at 172 (quoting *Harmelin*, 501 U.S. at 979 n.9 (lead opinion)). Including an ability to pay inquiry allows courts to do just that. *Id.*

To illustrate, a $500 fine might only cause a slight inconvenience for someone with a median Seattle household income of $102,500 per year, or around $8,500 monthly. Gene Balk, *Seattle's Median*

Household Income Soars Past $100,000—but Wealth Doesn't Reach All, Seattle Times (Oct. 4, 2020).[3]



[3] https://www.seattletimes.com/seattle-news/data/seattles-median-income-soars-past-100000-but-wealth-doesnt-reach-all/

Figure 1. From Gene Balk, *$100K-Plus Households are Now the Majority in Most Seattle Neighborhoods*, Seattle Times (March 31, 2022).[4]

On the other hand, a $500 fine can be ruinous to a poor person with no ability to pay. *See* Alec Schierenbeck, *Pay the Same Fine for Speeding*, New York Times (Mar. 15, 2018).[5] Requiring a proportionality analysis creates a more just legal system.

As it did with *Long* and *Blazina*, this Court should grant review to address the fairness of the mandatory victim penalty assessment. This fee violates both the Eighth Amendment and Article I, section 14 because it fails to provide the courts with an ability to

[4] https://www.seattletimes.com/seattle-news/data/100k-plus-households-are-now-the-majority-in-most-seattle-neighborhoods/

[5] https://www.nytimes.com/2018/03/15/opinion/flat-fines-wealthy-poor.html

assess ability to pay. To protect Mr. Williamson's constitutional rights, review should be granted.

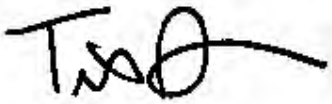
F. CONCLUSION

Based on the preceding, Mr. Williamson asks that review be granted pursuant to RAP 13.4(b).

This petition is 2,522 words long and complies with RAP 18.7.

DATED this 5th day of April 2023.

Respectfully submitted,



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APPENDIX

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IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE

THE STATE OF WASHINGTON, Respondent, v. THEOPHILUS WILLIAMSON, Appellant.	No. 83393-6-I UNPUBLISHED OPINION

BOWMAN, J. — A jury convicted Theophilus Williamson of domestic violence (DV) fourth degree assault. On appeal, Williamson contends the court erroneously instructed the jury that intimate partner status was an element of fourth degree assault and unlawfully imposed the victim penalty assessment (VPA). We affirm.

FACTS

Based on incidents in May and June 2021 involving his spouse, O.W.,[1] the State charged Williamson with second degree assault, count 1, unlawful imprisonment, count 2, and fourth degree assault, count 3. Each charge contained a DV designation.

At trial, O.W. testified about the incidents of DV in May and June 2021. The State also called O.W.'s coworker, several members of the Federal Way

[1] We use initials to protect O.W.'s privacy.

Police Department, an emergency room social worker, and a South King Fire and Rescue firefighter to testify. Williamson did not testify or call any witnesses.

Before deliberations, the court instructed the jury. Jury instruction 17 defined "intimate partner" as "spouses or former spouses." And instruction 19 stated:

> You will also be given special verdict forms for the crimes charged in Counts 1, 2, and 3. If you find the defendant not guilty of a crime, do not use the applicable special verdict form for that crime. If you find the defendant guilty of a crime, you will then use the applicable special verdict form for that crime, and fill in the blank with the answer "yes" or "no" according to the decision you reach. In order to answer the special verdict forms "yes," you must unanimously be satisfied beyond a reasonable doubt that "yes" is the correct answer. If you unanimously agree that the answer to the question is "no," you must fill in the blank with the answer "no". If after full and fair consideration of the evidence you are not in agreement as to the answer, then do not fill in the blank for that question.

Special verdict form 3 asked the jury, "Were the defendant, Theophilus Williamson, and [O.W.] intimate partners prior to or at the time the crime of Assault in the Fourth Degree as charged in Count 3 was committed." Williamson did not object to the special verdict form or instructions 17 and 19.

The jury found Williamson guilty of fourth degree assault as charged in count 3 and answered "yes" to the intimate partner question in special verdict form 3. It acquitted him of the remaining charges. As part of Williamson's sentence, the court imposed the mandatory $500 VPA. Williamson appeals.

ANALYSIS

Williamson asserts the court erred in instructing the jury and imposing the VPA.

Instructional Error

Williamson contends the court violated his right to an impartial jury under the Sixth Amendment to the United States Constitution by providing the jury with special verdict form 3 because the court "misled the jury to believe intimate partner status was an element of the fourth-degree assault." The State argues that because Williamson did not object to the form below, he failed to preserve his argument for appeal, so we should not review it. In the alternative, the State asserts the intimate partner finding serves a legitimate legislative purpose, and any error was harmless.

We may refuse to review "any claim of error which was not raised in the trial court" unless the appellant can show a "manifest error affecting a constitutional right." RAP 2.5(a)(3); State v. O'Hara, 167 Wn.2d 91, 97-98, 217 P.3d 756 (2009). We do not assume an alleged error is of constitutional magnitude. O'Hara, 167 Wn.2d at 98. Williamson must identify a constitutional error and show how that error actually affected his rights. State v. Gordon, 172 Wn.2d 671, 676, 260 P.3d 884 (2011).

"To satisfy the constitutional demands of a fair trial, the jury instructions, when read as a whole, must correctly tell the jury of the applicable law, not be misleading, and permit the defendant to present his theory of the case." O'Hara, 167 Wn.2d at 105 (citing State v. Mills, 154 Wn.2d 1, 7, 109 P.3d 415 (2005)). "Failure to properly instruct the jury on an element of a charged crime is an error of constitutional magnitude which may be raised for the first time on appeal." State v. Roggenkamp, 153 Wn.2d 614, 620, 106 P.3d 196 (2005) (citing State v.

Stein, 144 Wn.2d 236, 241, 27 P.3d 184 (2001); RAP 2.5(a)). But if "the instructions properly inform the jury of the elements of the charged crime, any error in further defining terms used in the elements is not of constitutional magnitude." State v. Stearns, 119 Wn.2d 247, 250, 830 P.2d 355 (1992).

Here, the court instructed the jury as to the elements of fourth degree assault. Instruction 16 told the jury that to convict Williamson of that crime, the State had to prove beyond a reasonable doubt that he assaulted O.W. on May 7, 2021 and that the assault occurred in Washington.[2] See former RCW 9A.36.041(1) (2020). Instruction 16 did not list Williamson and O.W.'s intimate partner status as an element of the crime. And instruction 19 informed the jury that it should answer the intimate partner question posed in the "applicable special verdict form" only if it found Williamson guilty of the crime. We presume juries follow the trial court's instructions. State v. Kirkman, 159 Wn.2d 918, 928, 155 P.3d 125 (2007).

Because the instructions did not mislead the jury to believe that intimate partner status was an element of fourth degree assault, any alleged error

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[2] Jury instruction 16 states:

> To convict the defendant of the crime of assault in the fourth degree, as charged in Count 3, each of the following elements of the crime must be proved beyond a reasonable doubt:
>
> (1) That on or about May 7, 2021, the defendant assaulted [O.W.]; and
>
> (2) That this act occurred in the State of Washington.
>
> If you find from the evidence that each of these elements has been proved beyond a reasonable doubt, then it will be your duty to return a verdict of guilty as to Count 3.
>
> On the other hand, if, after weighing all of the evidence, you have a reasonable doubt as to any one of these elements, then it will be your duty to return a verdict of not guilty as to Count 3.

regarding the intimate partner special verdict form is not of constitutional magnitude. Stearns, 119 Wn.2d at 250. As a result, Williamson failed to preserve the issue for appeal, and we decline to reach the merits of his challenge.[3]

VPA

Williamson argues the VPA violates the excessive fines clauses of the Eighth Amendment to the United States Constitution and article I, section 14 of the Washington Constitution. We recently rejected this same argument in State v. Tatum, 23 Wn. App. 2d 123, 514 P.3d 763, review denied, 200 Wn.2d 1021, 520 P.3d 977 (2022).

In Tatum, we explained that we are bound by our Supreme Court's decision in State v. Curry, 118 Wn.2d 911, 829 P.2d 166 (1992). 23 Wn. App. 2d at 130-31. Curry held that the VPA "is neither unconstitutional on its face nor as applied to indigent defendants." 118 Wn.2d at 917-18. We again rejected this argument on the same grounds in State v. Ramos, ___ Wn. App. 2d ___, 520 P.3d 65, 79 (2022) ("As this court explained in Tatum, we are bound by [Curry's] holding here.").

Although Williamson asks us to "reexamine [our] most recent opinions" so that we can "conclude that state and federal precedent requires [us] to find the

[3] Because Williamson fails to establish the alleged error is of constitutional magnitude, we need not determine whether the error was manifest. O'Hara, 167 Wn.2d at 99 (we address manifest error only after determining an error is of constitutional magnitude). And because we conclude Williamson cannot raise his argument for the first time on appeal, we do not address the State's alternative arguments.

mandatory imposition of the [VPA] . . . unconstitutional,"[4] we decline his invitation. As in Tatum and Ramos, we continue to adhere to Curry's holding that the VPA is not unconstitutionally excessive as applied to indigent defendants. The court properly imposed the VPA here.

We affirm Williamson's DV fourth degree assault conviction and imposition of the VPA.

Brunner, J.

WE CONCUR:

Díaz, J.

Chung, J.

[4] When, as here, the defendant receives a gross misdemeanor conviction, RCW 7.68.035(1)(a) requires the sentencing court to impose a $500 VPA. See former RCW 9A.36.041(2).

DECLARATION OF FILING AND MAILING OR DELIVERY

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 **Court of Appeals – Division One** under **Case No. 83393-6-I**, 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:

☒ Respondent Jennifer Joseph
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☐ Attorney for other party

TAYLOR HALVERSON, Legal Assistant
Washington Appellate Project

Date: April 5, 2023

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