

FILED  
SUPREME COURT  
STATE OF WASHINGTON  
3/29/2024 3:29 PM  
BY ERIN L. LENNON  
CLERK

NO. 102845-8

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**SUPREME COURT OF THE STATE OF WASHINGTON**

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In re the Detention of:

ANDREW VEJAR,

Appellant,

v.

STATE OF WASHINGTON,

Respondent.

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**ANSWER TO PETITION FOR REVIEW**

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## TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	COUNTERSTATEMENT OF THE ISSUES.....	3
	A. Did the Court of Appeals correctly determine that the State presented sufficient evidence to show probable cause that Vejar meets the criteria for SVP commitment? .....	3
III.	COUNTERSTATEMENT OF THE FACTS.....	3
	A. Following a 20 Year Prison Sentence For First Degree Rape and Kidnapping, Vejar Reoffended As Soon as He Was Released from Community Supervision .....	3
	B. The State Petitioned for Vejar’s Civil Commitment .....	8
	C. After a Court Initially Found Probable Cause, a Second Court Disagreed and Dismissed the State’s SVP Petition.....	11
	D. The State Filed a Motion for Reconsideration.....	13
IV.	REASONS WHY REVIEW SHOULD BE DENIED ....	15
	A. The Court of Appeals Correctly Concluded that the State Established Probable Cause that Vejar Is a Sexually Violent Predator .....	15
	1. The State’s burden at this stage in the proceedings is low; it need only make a prima facie showing .....	15

2.	The Court of Appeals correctly concluded that there was ample evidence of a nexus between Vejar’s diagnoses and future qualifying acts of sexual violence .....	16
3.	Vejar’s Arguments About Alleged Deficiencies in Dr. Davis’s Report are Meritless .....	21
B.	This Case Does Not Involve an Issue of Substantial Public Interest under RAP 13.4(b)(4) ....	23
V.	CONCLUSION .....	24

## TABLE OF AUTHORITIES

### Cases

<i>Detention of Petersen</i> , 145 Wn.2d 789, 42 P.3d 952 (2002).....	15
<i>In re Detention of Thorell</i> , 149 Wn.2d 724, 72 P.3d 708 (2003).....	22
<i>In re Meirhofer</i> , 182 Wn.2d 632, 343 P.3d 731 (2015).....	23
<i>Matter of Welfare of Adams</i> , 24 Wn. App. 517, 601 P.2d 995 (1979).....	18
<i>State v. McCuiston</i> , 174 Wn.2d 369, 275 P.3d 1092 (2012).....	15, 16, 22
<i>U.S. v. Wood</i> , 52 F.3d 272, 274 n.1 (9th Cir. 1995) .....	18

### Statutes

RCW 9.94A.030(48) .....	19, 20
RCW 9A.40.020(1)(b).....	19
RCW 9A.40.030(1) .....	19
RCW 9A.44.010(3) .....	19
RCW 9A.44.010(13) .....	18
RCW 9A.44.083(1) .....	18
RCW 9A.44.086(1) .....	18

RCW 9A.44.100(1)(a).....	19
RCW 71.09.020(9) .....	9
RCW 71.09.020(13) .....	9
RCW 71.09.020(18)(a), (d).....	18, 20
RCW 71.09.020(19) .....	9, 13
RCW 71.09.040(2) .....	11

**Court Rules**

RAP 7.2 .....	14
RAP 13.4(b)(4).....	23
RAP 18.17 .....	24

## I. INTRODUCTION

Petitioner Andrew Vejar is a serial sex offender. In 1999, he and an accomplice kidnapped a young woman at gunpoint, repeatedly sexually assaulted her, and filmed it. They were well prepared for the attack; they had a black hood, knives, metal handcuffs, and latex gloves. During the assault, Vejar was fixated on his victim's buttocks. He was later sentenced to 20 years in prison, and even in a secure facility, Vejar sexually assaulted two female staff members by grabbing their buttocks.

Neither completing two sex offender treatment programs nor a lengthy prison sentence modified Vejar's behavior. Immediately after his release from community supervision, he assaulted three more people, including two minors. As he had in 1999, he prepared for these assaults. Vejar searched the internet for the start times of his local middle school and high schools. On separate occasions, while wearing a mask, he followed two students—aged 12 and 17—on their way to school and grabbed

their buttocks. Vejar also assaulted a 22-year-old woman in the same time span.

The Court of Appeals correctly concluded that the State satisfied its low burden to establish probable cause that Vejar meets criteria for civil commitment as a sexually violent predator (SVP), and accordingly, it properly reversed the trial court's dismissal of the State's SVP petition. The State supported its petition with an expert report opining that Vejar has a mental abnormality and that his mental abnormality makes him more likely than not to commit predatory acts of sexual violence if not confined in a secure facility. As the Court of Appeals recognized, the facts in the expert's report amply support her conclusions.

The Court of Appeals's unpublished decision involves a routine application of well-settled probable cause principles to the specific facts of this case. Contrary to Vejar's assertion, this case does not raise novel issues or circumstances warranting this Court's review. This Court should deny Vejar's petition.

## **II. COUNTERSTATEMENT OF THE ISSUES**

- A. Did the Court of Appeals correctly determine that the State presented sufficient evidence to show probable cause that Vejar meets the criteria for SVP commitment?**

## **III. COUNTERSTATEMENT OF THE FACTS**

- A. Following a 20 Year Prison Sentence For First Degree Rape and Kidnapping, Vejar Reoffended As Soon as He Was Released from Community Supervision**

In 1999, Vejar and his friend kidnapped a 20-year-old woman at gunpoint, forced her into a car, and sexually assaulted her. CP at 4-5, 27-28, 69-70. The victim told police that Vejar and his friend handcuffed her in the backseat, held a gun to her, and took turns digitally penetrating her vagina. CP at 5, 27, 70. She also told police that Vejar attempted to pull her onto his lap to have penile-vaginal intercourse. CP at 5, 27, 70. Vejar videotaped part of the assault. CP at 27, 28.

During the assault, Vejar noticed a police car following them, so he told the victim to put on her pants and “play it cool, or it would turn into a bloodbath.” CP at 5, 27, 70. Police eventually pulled the car over and searched it, where they



discovered metal handcuffs, a black hood, a video camera, a tripod, an air gun, knives, and latex gloves. CP at 5, 27, 70. The tape taken from the video camera showed the victim handcuffed and being digitally penetrated by a person wearing latex gloves. CP at 5, 27, 70. Vejar told investigating officers that he believed the victim was a willing participant. CP at 28. He said he took advantage of her alleged willingness, grabbed her rear end, and took pictures of her bottom. CP at 28.

A jury ultimately convicted Vejar of Rape in the First Degree, Attempted Rape in the First Degree, and Kidnapping in the First Degree. CP at 4-5, 27, 36, 69. He was sentenced to 264.25 months confinement and approximately three years of community supervision. CP at 5, 69.

In 2008, while in custody, Vejar grabbed the buttocks of two different female staff members. CP at 7, 47-47. First, he ran into a female staff member hard enough to almost knock her over while she was standing at a gate and pinched her buttocks. CP at 7, 47. *Id.* He was found guilty of Abusive Sexual Contact With

Staff, a major infraction. CP at 7, 47. Six months later, he was again found guilty of major infractions, Sexual Assault on Staff and Abusive Sexual Contact With Staff, after he followed and repeatedly touched the buttocks of a different female staff member. CP at 7, 48.

In January 2023, three weeks after Vejar was released from community supervision, he committed a spree of sexual assaults. CP at 5-6, 29-30, 36, 55, 78. Vejar wore a medical face mask during each assault in an attempt to hide his identity. CP at 5, 29-30; 71-72, 80.

First, on the morning of January 3, Vejar sexually assaulted a 17-year-old girl as she walked alone to Lincoln High School. CP at 29, 71. He grabbed the girl's buttocks with his hand and then fled. CP at 29, 71. Three weeks later, Vejar sexually assaulted a 12-year-old girl as she walked alone to her bus stop. CP at 29, 72. He followed her for some time before grabbing her buttocks with his hand. CP at 29, 72. Two days after that, Vejar sexually assaulted a 22-year-old woman who was out

alone on a walk. CP at 30, 72. Vejar ran up from behind her, grabbed her hips with both hands, slid his hands under her buttocks and squeezed hard. CP at 30, 72.

Vejar was later identified when another woman saw his picture and called police. CP at 30, 72. She said she had dated Vejar for about a month but broke up with him when her 13-year-old daughter told her that Vejar tried to put his phone up her skirt and videotape her crotch. CP at 30, 72.

Police later arrested Vejar and obtained search warrants for his residence and his cell phone. CP at 30, 73. Investigators discovered notes on Vejar's cell phone of what appeared to be coded observations of women and assaults he committed. CP at 6, 73. For example, one note read: "1-3-23: BJ Good Butt Asian in Gray Sweats/Lincoln Student/Good Handfuls," which was believed to refer to Vejar's assault of the 17-year-old victim on January 3rd. CP at 6, 73. Another note read: "1-25-23: BJ White Schoolgirl in black pjs off 56<sup>th</sup> safeway/Good Handfuls," which was believed to refer to Vejar's assault of the 12-year-old victim

on January 25th. CP at 6, 73. Based on the similarity of the notes to Vejar's offense history, the investigating officer believed that Vejar had several other victims who never reported assaults. CP at 73. Three of Vejar's entries matched police reports where female victims reported that a male grabbed their buttocks, leading officers to believe that Vejar is a suspect in those assaults. CP at 74.

Investigators also discovered that Vejar had searched the internet trying to determine the start times of his local middle school and high school. CP at 6, 73. Specifically, he searched: "what time does Lincoln high school start" and "what time does stewart middle school start." CP at 73.

Vejar had also searched the internet for degrading pornography, using search terms such as: "women treated like shit on porn," "girl licking big butt," "big butt groped," "old man fucks girl," "tricked into sucking dick," and "pissing in big butt." CP at 6, 73.

Investigators found over 5,600 images on Vejar's cell phone, the majority of which were pornographic and reflective of the above search terms. CP at 6, 73. They also found 438 videos, some of which appeared to be homemade and voyeuristic in nature. CP at 6, 73. The videos were concentrated on women's buttocks. CP at 6, 73-74.

In May 2023, Vejar pled guilty to three counts of Assault in the Fourth Degree and one count of Failure to Register as a Sex Offender. CP at 2, 71, 73. Vejar was sentenced to 364 days in jail and a fine for these offenses. CP at 71.

**B. The State Petitioned for Vejar's Civil Commitment**

Prior to Vejar's scheduled release from jail for the assault convictions, the State filed a petition alleging that Vejar is an SVP. CP at 1-2, 4. An SVP is "any person who has been convicted of or charged with a crime of sexual violence and who suffers from a mental abnormality or personality disorder which makes the person likely to engage in predatory acts of sexual

violence if not confined in a secure facility.”  
RCW 71.09.020(19).

The State alleged that: (1) Vejar has been convicted of three qualifying sexually violent offenses (the 1999 convictions for Rape in the First Degree, Attempted Rape in the First Degree, and Kidnapping in the First Degree); (2) Vejar currently suffers from a “mental abnormality” as that term is defined in RCW 71.09.020(9); and (3) Vejar’s mental abnormality causes him serious difficulty controlling his sexually violent behavior and makes him likely to engage in predatory acts of sexual violence if not confined in a secure facility. CP at 1-2. The State also alleged that Vejar has committed a “recent overt act” as that term is defined in RCW 71.09.020(13) (the 2023 convictions for Assault in the Fourth Degree and Failure to Register as a Sex Offender). CP at 2.

To support its petition, the State also filed a certification for the determination of probable cause with several attachments, including a forensic evaluation dated March 21, 2023 and an

updated evaluation dated July 7, 2023 from clinical psychologist Marianne Davis, Ph.D. CP at 4-91. Among other things, this documentation detailed Vejar's sexual offense history and Dr. Davis's forensic evaluation of Vejar's mental condition and risk of re-offense. CP at 24-91.

Dr. Davis opined to a reasonable degree of psychological certainty that Vejar meets criteria as an SVP. CP at 8, 12, 65, 91. She diagnosed Vejar with three mental disorders: (1) Antisocial Personality Disorder, (2) Frotteuristic Disorder, and (3) Fetishistic Disorder (Partialism/Pygophilia). CP at 8, 53-55, 77-79. Antisocial Personality Disorder is diagnosed when the subject has at least three of seven behavioral criteria, such as law-breaking, irritability or aggressiveness leading to fights, and a lack of remorse for harming others. CP 56. Frotteurism "involves touching or rubbing up against a nonconsenting person to generate sexual excitement or arousal." CP 54.

Dr. Davis concluded that the first two disorders constitute a "mental abnormality" as that term is defined in the SVP statute.

CP at 10, 56, 74, 80. She further concluded that Vejar's mental abnormality adversely affects his emotional and volitional capacity in such a way that predisposes him to the commission of criminal sexual acts. CP at 10, 56, 80. Finally, she conducted a comprehensive risk assessment and concluded that, due to his mental abnormality, Vejar is more likely than not to engage in predatory acts of sexual violence if he is not confined in a secure facility. CP at 10, 12, 56, 64, 80-91.

**C. After a Court Initially Found Probable Cause, a Second Court Disagreed and Dismissed the State's SVP Petition**

After the State filed its petition, Judge Grant Blinn found probable cause that Vejar is an SVP. CP at 94-95. Judge Blinn's finding was based on the pleadings submitted by the State. CP at 94. Judge Blinn entered an order finding probable cause that Vejar is an SVP, directing the issuance of a no bail warrant for Vejar's arrest and custodial detention, and the setting of an adversarial probable cause hearing within seventy-two hours of Vejar's arrest as required by RCW 71.09.040(2) . CP at 94-95.



The case proceeded to the adversarial probable cause hearing before Judge Karena Kirkendoll, to whom the case had been reassigned. *See* CP at 96; VRP at 1-44. After hearing argument from the parties and considering the pleadings, Judge Kirkendoll determined that the State failed to establish probable cause that Vejar is an SVP. VRP at 28-29. Specifically, she found that there was insufficient proof of a nexus between Vejar’s mental abnormality and future risk of sexually violent behavior. VRP at 28. She explained, “We’re missing that piece that helps me bridge the gap between what he has been diagnosed with, the antisocial personality disorder combined with the frotteuristic disorder, that leads him to an act of sexual predatory violence.” VRP at 28-29. Accordingly, she dismissed the SVP petition in an oral ruling. VRP at 29.

At the State’s request, the trial court agreed to give the State 24 hours to supplement the record and seek emergency relief. VRP at 39-40. It set another hearing 24 hours later—on August 4, 2023 at 1:30 p.m. VRP at 43. Additionally, despite

permitting supplementation, the court entered an order denying the existence of probable cause, dismissing the State's SVP petition, and directing Vejar's release on August 4, 2023 "no earlier than 3pm . . . ." CP at 127. In its dismissal order, the court concluded:

At this time, [t]here is not probable cause to believe that [Vejar] is a sexually violent predator as defined in RCW 71.09.020(19). The State has failed to make a prima facie showing that there is a nexus between the diagnoses and a future act of sexual predatory violence, as defined by the statute.

CP at 127.

The State promptly filed a notice of appeal and sought a stay of the trial court's order from the Court of Appeals, which the court granted. Comm'r's Ruling dated August 15, 2023.

**D. The State Filed a Motion for Reconsideration**

While the State pursued appellate review and emergency relief, it also filed its supplemental briefing as permitted by trial court, framed as a motion for reconsideration. CP at 131-33. Along with its motion, the State supplemented the record with an addendum from Dr. Davis, which reaffirmed her conclusion that

Vejar's mental abnormality makes him likely to engage in predatory acts of sexual violence. CP at 135-37. She explained:

Vejar's frotteuristic and fetishistic fantasies extend well beyond simply grabbing a young girl's or women's buttocks. He has already demonstrated he is capable of committing far more serious offenses, and in my opinion he poses a high risk for committing similar sexually violent offenses that is, he poses a high risk for committing a kidnapping and sexual assault similar to that he committed in 1999.

CP at 136.

The trial court denied the State's motion for reconsideration.<sup>1</sup> CP at 146. The State then filed a notice of appeal of the order denying reconsideration. CP at 147. The appeals were consolidated. The Court of Appeals ruled in favor of the State, reversing the trial court and remanding for a trial.

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<sup>1</sup> The Court of Appeals granted the trial court permission to consider and rule on the State's motion for reconsideration under RAP 7.2. *See* Notation Ruling dated August 11, 2023.

#### **IV. REASONS WHY REVIEW SHOULD BE DENIED**

##### **A. The Court of Appeals Correctly Concluded that the State Established Probable Cause that Vejar Is a Sexually Violent Predator**

Vejar does not dispute that he has a mental abnormality.

CITE. He also appears to concede that his mental abnormality makes him likely to commit sexual offenses. *See* Petition at 1, 7.

The only dispute is whether he is likely “sexually violent offenses” that would qualify him for commitment. The Court of Appeals correctly resolved this dispute and concluded that the State’s showing was more than sufficient.

##### **1. The State’s burden at this stage in the proceedings is low; it need only make a prima facie showing**

The probable cause standard is “not a stringent one . . . .” *State v. McCuiston*, 174 Wn.2d 369, 382, 275 P.3d 1092 (2012). “Probable cause exists if the proposition to be proven has been prima facie shown.” *In re Det. of Petersen*, 145 Wn.2d 789, 797, 42 P.3d 952 (2002). The court “must assume the truth of the evidence presented; it may not weigh and measure asserted facts

against potentially competing ones.” *McCustion*, 174 Wn.2d at 382 (internal quotation marks omitted). The trial court’s role is simply to “determine whether the asserted evidence, if believed, is sufficient to establish the proposition its proponent intends to prove.” *Id.* A trial court’s determination as to whether evidence establishes probable cause is subject to de novo review. *Id.*

**2. The Court of Appeals correctly concluded that there was ample evidence of a nexus between Vejar’s diagnoses and future qualifying acts of sexual violence**

The Court of Appeals correctly determined that the State’s evidence was “more than sufficient to establish the proposition that Vejar’s mental abnormality makes him more likely than not to commit a predatory act of sexual violence.” Slip op. at 22.

As the Court of Appeals recognized, the State presented evidence that Vejar was diagnosed with antisocial personality disorder and frotteurism. Slip op. at 19. Vejar’s serial frotteuristic behavior indicated “both that he found the conduct gratifying and that he experienced urges to repeat the experiences.” *Id.* Additionally, the fact that he spent 20 years in prison for a sexual

offense and yet sexually reoffended weeks after his community custody ended “indicates the urges to grab and touch the victims were intense.” *Id.* 19-20. This urge was apparently undiminished after he “successfully completed *two separate* [sex offender treatment programs].” *Id.* Finally, Dr. Davis’ risk assessment also demonstrated that Vejar is at a high risk of reoffending. His score on the Static 99-R placed him in the “well above-risk category for being charged or convicted of another sexual offense and in the 94<sup>th</sup> percentile for risk of re-offense as compared to other male sex offenders.” Slip op. at 20 (internal quotations omitted).

The Court of Appeals also properly rejected Vejar’s argument is that the State’s proof is insufficient because grabbing buttocks is not sexually violent conduct. Opinion at 11. First, grabbing a person’s buttocks *can* be a sexually violent offense under certain circumstances. If the person is less than 14 years of age, for example, it could constitute child molestation in the first

or second degree.<sup>2</sup> CP at 68. Attempts to commit either offense also qualify as sexually violent offenses under the statute. RCW 71.09.020(18)(a), (d).

Second, Vejar’s propensity to engage in this behavior is not just theoretical. The record establishes that Vejar searched the start times of his local middle school and high school and grabbed the buttocks of a 12-year-old girl on her way to school. Slip op. at 21; CP 20, 72-73. And, as the Court of Appeals explained, even though Vejar was convicted of fourth degree assault for this offense, “his underlying conduct qualifies as second degree child molestation[,]” which is a qualifying offense

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<sup>2</sup> A person is guilty of Child Molestation in the Second Degree “when the person has . . . sexual contact with another who is at least twelve years old but less than fourteen years old and the perpetrator is at least thirty-six months older than the victim.” RCW 9A.44.086(1). A person is guilty of Child Molestation in the First Degree “when the person has . . . sexual contact with another who is less than twelve years old and the perpetrator is at least thirty-six months older than the victim.” RCW 9A.44.083(1). “‘Sexual contact’ means any touching of the sexual or other intimate parts of a person done for the purpose of gratifying sexual desire of either party or a third party.” RCW 9A.44.010(13). Courts have found buttocks to be an “intimate part.” *In re Welfare of Adams*, 24 Wn. App. 517, 519-20, 601 P.2d 995 (1979). Child Molestation is the current analog to Indecent Liberties against a child under age 14. *See U.S. v. Wood*, 52 F.3d 272, 274 n.1 (9th Cir. 1995).

under the statute. Slip op. at 21. The record also shows other concerning behavior involving minors, including allegations that Vejar tried to put his phone up at 13-year-old's skirt and videotape her crotch. CP at 72.

Additionally, although not relied on by the Court of Appeals, grabbing a person's buttocks can also be a predatory act of sexual violence if it is accomplished by force or restraint. For example, it could result in Indecent Liberties With Forcible Compulsion<sup>3</sup>; Kidnapping in the First or Second Degree With Sexual Motivation<sup>4</sup>; or Unlawful Imprisonment with Sexual

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<sup>3</sup> A person is guilty of Indecent Liberties With Forcible Compulsion "when he or she knowingly causes another person to have sexual contact with him or her or another . . . [b]y forcible compulsion." RCW 9A.44.100(1)(a). "'Forcible compulsion' means physical force which overcomes resistance, or a threat, express or implied, that places a person in fear of death or physical injury to herself or himself or another person, or in fear that she or he or another person will be kidnapped." RCW 9A.44.010(3).

<sup>4</sup> A person is guilty of Kidnapping in the First Degree "if he or she intentionally abducts another person with intent . . . (b) [t]o facilitate commission of any felony or flight thereafter. . . ." RCW 9A.40.020(1)(b). A person is guilty of Kidnapping in the Second Degree "if he or she intentionally abducts another person under circumstances not amounting to kidnapping in the first degree." RCW 9A.40.030(1). "'Sexual motivation' means that one of the purposes for which the defendant committed the crime was for the purpose of his or her sexual gratification." RCW 9.94A.030(48).



Motivation.<sup>5</sup> CP at 68. Attempts to commit those offenses also qualify under the statute. *See* RCW 71.09.020(18)(a), (d).

Dr. Davis's report supports an inference that Vejar is likely to use force in committing future assaults. Vejar has already demonstrated a willingness and capacity to use threats, restraints, kidnapping, and weapons in the commission of crimes against others. Vejar kidnapped and raped a woman in a "well-planned" attack in 1999 where he brought handcuffs, weapons, and told his victim "play it cool, or it would turn into a bloodbath." CP at 87, 27, 70.

The characteristics associated with his mental abnormality also support an inference that Vejar is likely to use force to achieve sexual gratification, including: (1) his aggressiveness; (2) reckless disregard for the safety of others; (3) lack of remorse; (4) deviant sexual interest in nonconsenting adult touching; (5) severe hostility toward women; (6) inability to appreciate harm

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<sup>5</sup> A person is guilty of Unlawful Imprisonment if he or she knowingly restrains another person. RCW 9A.40.040(1); *see also* RCW 9.94A.030(48) (defining "sexual motivation").

to his victims; (7) and inability to respond appropriately to victims' fears and protests. *See* CP 77, 79-80, 87-89.

Finally, Dr. Davis's report supports a conclusion that Vejar's abnormality makes him likely to commit sexually violent offenses similar to those he has committed in the past. CP at 136. Vejar admitted that when he raped and kidnapped a woman in 1999, he grabbed the victim's rear end and took pictures of her bottom, suggesting that his mental abnormality may have played a role in the commission that offense. CP at 28, 70. Additionally, the characteristics associated with Vejar's mental abnormality, just discussed, further support that Vejar is likely to commit these offenses.

### **3. Vejar's Arguments About Alleged Deficiencies in Dr. Davis's Report are Meritless**

Vejar briefly raises two other points suggesting that Dr. Davis's reports and conclusions are insufficient. Both are without merit.

First, Vejar points out that Dr. Davis did not diagnose a paraphilic disorder associated with arousal to non-consent or

attraction to children. Petition at 10-11. These attacks on the strength of her opinion call for weighing of the evidence, which is inappropriate at the probable cause stage. *State v. McCuiston*, 174 Wn.2d 369, 382, 275 P.3d 1092 (2012). The trial court may not “weigh and measure asserted facts against potentially competing ones”; it “must determine whether the asserted evidence, if believed, is sufficient.” *Id.* These arguments are for a jury at trial, not a trial court at filing of the petition.

In any case, this arguments also fails because “there is no talismanic significance to a particular diagnosis of mental illness. No technical diagnosis of a particular ‘mental abnormality’ definitively renders an individual either an SVP or not.” *In re Det. of Thorell*, 149 Wn.2d 724, 762, 72 P.3d 708 (2003). In other words, Vejar need not be diagnosed with a paraphilic disorder associated with arousal to non-consent or attraction to children in order to qualify for SVP commitment.

Second, Vejar briefly argues that Dr. Davis’ actuarial risk assessments did not place his risk of reoffending at more than

50%. Petition at 4, 10. This is immaterial. This Court has held that the SVP statute “does not limit experts to the results of actuarial tests and there is no requirement that the SVP will reoffend in the foreseeable future.” *In re Det. of Meirhofer*, 182 Wn.2d 632, 645, 343 P.3d 731 (2015) (internal quotation marks omitted). At the outset of her reports, Dr. Davis listed offenses that expressly qualify under the SVP statute, which indicates that her opinion was properly focused on qualifying offenses as opposed to other conduct. CP at 26, 68. She ultimately opined that—in her professional judgment—due to Vejar’s mental abnormality, he is more likely than not to engage in predatory acts of sexual violence if he is not confined in a secure facility. CP at 10, 12, 56, 64, 80-91. Nothing more is required.

**B. This Case Does Not Involve an Issue of Substantial Public Interest under RAP 13.4(b)(4)**

Vejar contends that his appeal involves a substantial issue of public interest because it “provides this [C]ourt with an opportunity to apply [the definition of “sexually violent predator”] to a subset of sex offenders who do not fit neatly

within [that] definition.” Petition at 12. But as explained above, Vejar fits squarely within the statutory definition, and any arguments to the contrary are ones he can make at trial. Further, Vejar makes no attempt to support his implied claim that there are other potential SVPs that share Vejar’s alleged incongruity with the definition. In short, this is a fact-specific case involving a routine probable cause determination that the Court of Appeals correctly resolved. Further review by this Court is unwarranted.

## V. CONCLUSION

For the foregoing reasons, this Court should decline Vejar’s petition for review and permit the matter to proceed to a trial before a jury.

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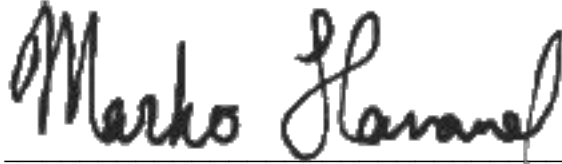
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RESPECTFULLY SUBMITTED this 29<sup>th</sup> day of March,  
2024.

ROBERT W. FERGUSON  
Attorney General

A handwritten signature in black ink that reads "Marko Hananel". The signature is written in a cursive style with a large, prominent initial "M".

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MARKO HANANEL, WSBA #56592  
Assistant Attorney General

NO. 102845-8

**SUPREME COURT OF THE STATE OF WASHINGTON**

In Re Detention of:

ANDREW VEJAR,

Appellant.

DECLARATION  
OF SERVICE


I, Malia Anfinson, declare as follows:

On March 29, 2024, I sent via electronic mail, per service agreement, a true and correct copy of Answer to Petition for Review and Declaration of Service, addressed as follows:

Jodi R. Backlund  
Backlund & Mistry  
[backlundmistry@gmail.com](mailto:backlundmistry@gmail.com)

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 29<sup>th</sup> day of March, 2024, at Seattle, Washington.

  
MALIA ANFINSON

**WASHINGTON STATE ATTORNEY GENERAL'S OFFICE - CRIMINAL JUSTICE DIVISION**

**March 29, 2024 - 3:29 PM**

**Transmittal Information**

**Filed with Court:** Supreme Court  
**Appellate Court Case Number:** 102,845-8  
**Appellate Court Case Title:** In the Matter of the Detention of: Andrew A. Vejar  
**Superior Court Case Number:** 23-2-08435-2

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