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IN THE SPUPREME COURT OF THE STATE OF WASHINGTON

COURT OF APPEALS NO. 31857-5-111

STATE OF WASHINGTON, RESPONDENT

V.

THOMAS L. PARKER

PETITION FOR REVIEW

Thomas L. Parker
Petitioner, Pro-Se
ADC# 124141
Delta Regional Unit
880 E. Gaines St.
Dermott, AR 71601

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I. IDENTITY OF PETITIONER

Thomas L. Parker request that this court accept review of the decision described tin part II of this petition.

II. DECISION OF THE COURT OF APPEALS

Petitioner seeks review of the Court of Appeals filed on June 2, 2015, affirming Parker's conviction and sentence for robbing a Rite Aid store. A copy of the Court of Appeals unpublished opinion is attached here to,

III. ISSUES PRESENTED FOR REVIEW

Parker challenged the state's introduction of evidence that failed to contain the necessary elements of the crime of Second Degree Robbery. Under the Sixth Amendment of the United States Constitution, a charging document must include all essential elements of a crime to inform a defendant of the charges against him and to allow preparation of the defense. U.S. Const. Amend. V1. (proving [i]n all criminal prosecutions, the accused shall... be informed of the nature of the accusation"), Parker argues that under RCW 9A.56.190 a conviction for robbery requires proof that the accused person unlawfully took property from another. Parker further argues that a criminal has the constitutional right to complete opportunity to prepare a complete defense. See also Auburn V. Brooks, 119 Wn.2d 623, 629-30, 836 P.2d 212 (1992), Kjvrsuki, 117 Wn.2d at 101-02. U.S. Const. Amend V1.XIV; Wash. Const. Art 1, §22; Holmes V South Carolina 542 U.S. 319, 324, 126 S.ct. 1227, 164 L. Ed. 2d 503 (2006) under Fernandez V. Medina 141 Wn. 2d at 461-62. Parker was entitled to the requested lesser included third degree theft instruction. State v. Parker, 102 Wn.2.d 161, 164, 683 P.2d 189 (1984). Parker also contends that during sentencing, engaging in a comparability analysis demonstrates that the Arkansas Burglary and Theft charges are not legally comparable to Washington offenses, and therefore they should not be included in Parker's offender score under Rcw 9.94A. 525(3) see also. State v. Morley. 134 Wn. 2d 588, 606, 952 P. 2d 167 (1998). Parker now request review of the following aspects of the Court of Appeals ruling:

1. That the necessary facts appeared in any form or fair construction of the language

in the charging document.

2. That the evidence does not support an inference that Third Degree Theft occurred.

3. That the State asserts the issue of Parkers [offender score] is moot even if Parker has to return to Washington to serve his term of 18 months Community Custody.

IV. STATEMENT OF THE CASE

Thomas L. Parker was charged with Second-Degree Robbery for taking two bottles of tequila belonging to Rite-Aid. During a two day trial, the evidence showed that on Nov. 17, 2012 Mr. Parker entered a Rite-Aid store on 4th Avenue in Pasco Washington, while in Rite-Aid, Parker took two bottles of Tequila from the shelves of the store and concealed them in his pants. Before Parker left the store he asked the cashier if they took APS cards, then exited the store and set off the alarm. When loss preventing officer Zakeriah Briggs saw Parker conceal these items, Briggs exited the store, Parker them attempted to get away, Parker then lowered himself down and drove his shoulder into Briggs. When store manager Samuel Farias saw this confrontation between Parker and Briggs, Farias came out to assist. Briggs was struggling with Parker, Parker took the bottle out and threw it down, Farias grabbed Parker's arm and put it behind his back and Briggs took his phone out and dialed 911.

City of Pasco police officer Kevin Erickson testified as follows: After Parker was advised of his Miranda rights, Parker's total statement was he had family, he had people to take care of and asked if Erickson could write him a ticked instead of taking him to jail. Erickson then asked Parker what occurred and Parker said that he went out the door, two men grabbed him for no reason at all, and that he did not do anything. Erickson also testified that he did not see any stolen merchandise when he arrived on the scene.

City of Pasco police officer Bill Wright was dispatched to Rite-Aid at the time. Officer Wright testified that he did not contact any other civilians there as part of his investigation, nor did he locate any other witness to the alleged incident. Officer Wright further testified that he did not locate or view any merchandise that was allegedly stolen.

Briggs testified that company policy dictates that if a suspected shoplifter was leaving the building, they do not have physical contact with the shoplifter, they are not allowed to put their hands on a suspected shoplifter. As Parker exited the store, Briggs and Farias were restraining Parker outside the building. Briggs further testified that there are operational cameras in the building, but there are no cameras outside the building. Briggs testimony was different than what it was during the initial interview. Briggs stated that during the interview that as soon as Parker allegedly ran into him and the manager, that he threw the first bottle then the second bottle. Defense found that Briggs explanation to be inconsistent during trial. Briggs was asked where the alleged two bottles of Tequila were when the police arrived. He stated that he could not remember if the supervisor picked up the alleged bottles or not. He stated that the supervisor was a completely different person, and the police didn't speak with him, the store manager Farias was asked during trial did he recall giving a statement in the prosecutors office, telling them he was standing behind Briggs during the alleged incident. His testimony changed. Briggs stated that the tequila may have been recovered and restocked. He also testified that the police were still present when the alleged merchandise was restocked.

The defense called Mark Almquist, a private investigator who witnessed the defense interviews of Briggs and Farias. According to Almquist, Briggs stated that it come to his attention that there was someone who was suspicious and may have been selecting products intending to leave the store without paying for them.

The building has two sets of glass doors, an interior door, a vestibule, an exterior door and he was outside the vestibule door approximately 15 to 20 feet. Briggs saw a black male who was approximately six feet tall with a black jacket coming through both sets of doors. Briggs said as the individual made contact with him he put his shoulder down and crashed into him like a football player and they made contact.

Then Farias grabbed the man around the arms above the elbows like a bear hug. They squirmed around, then the man reached into his pants with his lower arm and pulled out a bottle and threw it in the grass and the bottle did not break.

Before trial, Parker moved to dismiss the alleged charge of Second-Degree Robbery. The state rejected the motion. The state also opposed the objection of not handing out the purposed

jury instructions of third degree theft. The trial court denied the request for lesser-included instruction.

In closing argument, the state relied heavily upon Parker's statement to the police officers:

> Now, I think we can all agree that Mr. Parker made a bad decision in terms of concealing the merchandise in his pants. He knew he was wrong and he told the officer when the officer... The first officer arrived, I'm sorry for what I did and after when questioned about the incident or after allegations being made he told the officer, no, I didn't do that. I did want to be held accountable for what I did.
>
> And later the state argued:
>
> What I told you during jury instructions was; that the elements of the crime are the exact crime that fit the situation isn't always obvious. You will recall the witness testified there was at least Mr. Briggs and Mr. Farias there. They also said there was a clerk there. Those people were there at the time he took that and walked out the store.
>
> The prosecutor later argued:
>
> I can't get into Mr. Parker's mind and explain why someone would take risk to get alcohol. I can only tell you what happened that day.

The jury convicted Parker of Second-Degree Robbery. In an unpublished opinion, the court of appeals affirmed, holding that there is no violation of Parker's rights and he does not show that this issue involves matters of continuing and substantial public interest justifying a decision, while finding his offender score is moot. Opinion at 8. Parker now seeks review of the Court of Appeals ruling that the information didnt't fail to include the essential elements of the crime of Second-Degree robbery. And review of the ruling that Parker was not entitled to a lesser-included instruction of third degree theft.

V. ARGUMENT OF WHY REVIEW SHOUD BE ACCEPTED

Under RAP 13.4 (b(3) and (4), review will be accepted if a significant question of law under the constitution of the State of Washington or of the United States is involved, or if the petition included an issue of substantial public interest that should be determined by the Supreme Court. Both factors are satisfied in the present case.

The Supreme Court of Appeals decision represents a substantial constitutional jurisprudence. Since the U.S. Supreme Court decision in Gardner V. Florida, 430 U.S. 394 (1977). As the Supreme Court affirmed more than a century ago; Common justice requires that no man shall be condemned in person or property without... an opportunity to make his defense: Baldwin V. Hale, 1 Wall, 223, 233, 17 L. Ed, 531 (1864). See also Windsor V. McVeigh, 93 U.S. 274, 277, 23 L. Ed 914 (1876). A proforma opportunity will not do. Due process demands an opportunity to be heard "at a meaningful time and in a meaningful manner". Armstrong V. Manzo, 330 U.S. 545, 552, 85 S. ct. 1187, 1191, 14 L. Ed 2d62 (1965); Morgan V. United States, 304 U.S. 1, 18, 58 S. Ct. 773, 776, 82 L. Ed 1129 (1938). The right to a hearing embraces not only the right to present evidence but also a reasonable opportunity to know the claims of the opposing party and to meet them") Absent a full, fair, potentially effective opportunity to defend against the states charges, the right to a hearing would be only but a barren one.

A challenge of the sufficiency of the charges document may be raised at any time. Kjursuik, 117 Wn, 2d at 102 (for the record Parker has submitted a sworn affidavit that the defense moved to dismiss for insufficient charges document before the state rested.")

Berlin 133 Wn. 2d 548, the rule entitling a defendant to have juries instructed on lesser included offenses serves to ensure a defendant's constitutional right to adequate notice and protects the constitutional right to present a defense. The party requesting the leper included instruction is not required to produce the evidence supporting the instruction. State v. Packeco, 107 Wn.2d. 59, 726 P.2d. 981 (1986).

The instruction should be given it the evidence would permit a jury to rationally fine a defendant guilty of the letter defense and the greater. State v. Warden, 133 Wn.2d. 559, 947 P.2d. 709 (1997).

Fernandez –Median, 141 Wn. 2d at 451-52. Id. At 456-57. Additionally, the court

concluded an accused is entitled to present more than one theory in his defense and its for the jury, not the judge, to determine if any or all of the theories should be accepted. Id. at 460-61. Parker was entitled to the lesser included Third-Degree theft instruction. Without the requested instruction, Parker was unable to have the jury consider his defense that the alleged bottle of tequila was taken by immediate force, and was just a theft. Courts have disapproved, however, circumstances when juries are given the all-or-nothing choice of either to acquit or convict Parker of Second-Degree Robbery, Parker was unfairly prejudiced.

The court incorrectly included all two of Parker's Arkansas convictions in his offender score. The court sentenced Parker to 29 months, and he still has a term of 18 months community custody to serve. Therefore, Parker's offender score is not moot. Nevertheless, as the Ninth Circuit recognized, an individual who is required to be in a certain place to complete their obligation is clearly subject to restraints on his liberty not shared by the public generally.

Barry V. Bergen County Probation Dept. 128 F. 3d 152 (3d Cir 1997) Therefore, the 18 month community custody in this case, requiring Parker's physical presence in the State of Washington, significantly restrains Parker's liberty to do those things which free persons in the United States are entitled to do and therefore must be characterized for jurisdictional purposes as custody.

Nakell V. Attorney General of North Carolina, 15 F. 3d 319 (4th Cir 1994) generally a case becomes moot when the issues presented are no longer [live"] or the parties lack a legal cognizable interest in the outcome. Murphy V. Hunt, 455 U.S. 478, 481 (1982). Also see Leonard V. Hammond 804 F. 2d 838, 842 (4th Cir 1986); Drew V. Circuit of the first Circuit, 995 F. 2d 822, 922-23 (9th Cir 1993) Moreover, the ruling presents an issue of substantial public interest.

The courts have reasoned that the sufficiency of the charging document was firmly established in the courts. When it comes to discovery obligations the prosecution pursued my trial by ambush, by prolonging information at the last possible moment. This case is a prime example of a deprivation of a fair trial resulting from claiming that the information had not been disclosed during discovery. In Earl V. State, 272 Ark 5, 612 S.W. 2d 458 (1989).

The motion should have been granted since the state failed to in its obligation to timely inform the defendant of all the information it had been properly requested to furnish. Williams

V. State 267 Ark 527, 593 S.W. 2d 8 (1980). The defendant was entitled, under the existing rules of procedure and precedent , a reasonable length of time to adequately prepare his defense. Instead he was ambushed by the state and trial court condoned the state's methods. That was error which required reversal".

CONCLUSION

Additionally, a defendant is not entitled to a perfect trial, but he is certainly guaranteed a fair trial. Bema V State 489, 509 (1983). The defendant did not receive a fair trial in this case. He was blindsided by evidence which never before trial been disclosed by the state, allowing the evidentiary errors and the refusal to grant the motion prejudicing the defendant greatly, to the extent that the fair trial that was guaranteed was not provided. For the forgoing reasons, the petition for review should be granted under RAP 13.4 (b)(3) and (4). And Parker respectfully requests that the court find that prejudicial errors were committed below such that his sentence ought to be reversed and his case remanded further proceedings. The court should have submitted Parker's requested lesser included offense instructions to the jury. In addition, the trial court erred in failing to dismiss the case for insufficient information.

The trial court also erred in determining Parker's offender score for purposes of sentencing because the prior out of state convictions were not comparable to the Washington statutes. Parker's judgment and sentence should be vacated, and the case remanded for a new trial.

Respectfully submitted this 14th day of August, 2015

Thomas L. Parker, *pro-se*
ADC# 124141

DECLARATION OF SERVICE

I, the undersigned, hereby declare that on this date, I caused to be served a true and correct copy of Petition for Review upon the following parties in the interest by depositing them in the U.S. Mail, First-Class, postage pre-paid, addressed as follows:

WASHINGTON SUPREME COURT
TEMPLE OF JUSTICE
P.O. BOX 40929
OLYMPIA, WA 98504-0929

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

Signed this 11th day of August, 2015 in Dermott, Arkansas.

Pro-Se Petitioner
Thomas L. Parker

APPENDIX

FILED
JUNE 2, 2015
In the Office of the Clerk of Court
WA State Court of Appeals, Division III

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

STATE OF WASHINGTON,	)	No. 31857-5-III
	)	
Respondent,	)	
	)	UNPUBLISHED OPINION
v.	)	
	)	
THOMAS L. PARKER,	)	
	)	
Appellant.	)	

BROWN, A.C.J. — Thomas L. Parker appeals his 2013 Franklin County second degree robbery conviction. He contends: (1) the information omitted an essential element of the offense of second degree robbery, that he used or threatened to use force to retain the stolen items, (2) the trial court should have instructed the jury on the lesser included offense of third degree theft, and (3) the trial court erred by including two prior Arkansas convictions in his offender score. In his pro se statement of additional grounds for review, he asserts that he had ineffective assistance of trial and appellate counsel. We affirm his judgment and sentence.

FACTS

The charge here arose in November 2012, when a Rite Aid employee—Zachariah Briggs—saw Mr. Parker take two bottles of tequila off the store shelf and secrete them in his pants. After Mr. Parker left the store without paying (setting off the alarm), Mr. Briggs approached, and Mr. Parker immediately lowered his head and rammed his shoulder into him. Another Rite Aid employee witnessed Mr. Briggs struggling to subdue Mr. Parker and went to help. At this point, Mr. Parker threw the bottles of tequila on the ground and hit Mr. Briggs in the face. The Rite Aid employees eventually subdued Mr. Parker and called police.

The State charged Mr. Parker with one count of second degree robbery, alleging:

> That the said Thomas L. Parker in the County of Franklin, State of Washington, on or about November 27, 2012, then and there, with intent to deprive the owner of property, did unlawfully take such personal property, to wit: two bottles of tequila which belonged to a person other than the accused, in the presence of Zak N. Briggs, against such person's will by use or threatened use of immediate force, violence, or fear of injury to the person.

Clerk's Papers (CP) at 132. The jury found him guilty as charged.

At sentencing, the State recommended an offender score of six, including three prior Arkansas convictions of residential burglary, theft of property, and theft by receiving, two Washington convictions of residential burglary and second degree burglary, and one additional point for committing the current crime while on community

custody (RCW 9.94A.525). The standard range with an offender score of 6 is 33 to 43 months. RCW 9.94A.510; RCW 9.94A.515; RCW 9A.56.210. Finding that "[r]ecent changes in the theft statute result[] in an offender score that does not reflect the legislature's intent," the trial court imposed an exceptional sentence downward of 29 months. CP at 23.

A. Sufficiency of the Information

Mr. Parker first contends the information was deficient because it did not include a necessary element—use of force to retain the property—or specific facts alleging that he used force to retain the property. He claims that the failure to describe the specific conduct constituting the crime was legally and factually deficient.

A charging document must contain all the essential elements of a crime to inform a defendant of the charge and to allow preparation for a defense. *State v. Kiliona-Garramone*, 166 Wn. App. 16, 22, 267 P.3d 426 (2011), *review denied*, 174 Wn.2d 1014 (2012). To determine the essential elements of a charged crime, we look to the statutory language and construe it to avoid an absurd result. *Id.* (citing *State v. Tinker*, 155 Wn.2d 219, 221, 118 P.3d 885 (2005); and *State v. Engel*, 166 Wn.2d 572, 578, 210 P.3d 1007 (2009)).

The standard of review for a challenge of the criminal information depends on the timing of the challenge. *Kiliona-Garramone*, 166 Wn. App. at 23. If the defendant

challenged the sufficiency of the information before or at trial, we construe the information strictly. *State v. Vangerpen*, 125 Wn.2d 782, 788, 888 P.2d 1177 (1995). "If, however, a defendant moves to dismiss an allegedly insufficient charging document after a point when the State can no longer amend the information, such as when the State has rested its case," the information is construed liberally in favor of validity. *Kiliona-Garramone*, 166 Wn. App. at 23.

Because Mr. Parker did not challenge the sufficiency of the information until after the State rested its case, we liberally construe the language of the charging document in favor of validity. *Id.* Under this standard, we determine whether the necessary facts appear in any form or fair construction of the language in the charging document, and if so, whether Mr. Parker can show that he was nonetheless actually prejudiced by a lack of notice. *State v. Kjorsvik*, 117 Wn.2d 93, 105-06, 812 P.2d 86 (1991); *Kiliona-Garramone*, 166 Wn. App. at 25.

Here, the information alleged Mr. Parker "with intent to deprive the owner of property, did unlawfully take such personal property, to wit: two bottles of tequila" in the presence of Mr. Briggs, and against such person's will by use or threatened use of force. CP at 132. The essential elements of robbery are defined in RCW 9A.56.190, partly stating a person commits robbery "when he or she unlawfully takes personal property from the person of another or in his or her presence against his or her will by the use or

threatened use of immediate force." This force or fear "must be used to obtain or retain possession of the property, or to prevent or overcome resistance to the taking." RCW 9A.56.190. The language of the information closely tracks the statutory language and specifically names the personal property taken (two bottles of tequila), as well as the person who was present at the taking and against whom force was used to take and retain the tequila (Mr. Briggs). Consequently, the necessary facts are included and gave Mr. Parker ample notice of the charge against him.

B. Lesser Included Offense

Mr. Parker next contends the trial court erred in denying his motion for a jury instruction on third degree theft as a lesser included offense of second degree robbery. A defendant is entitled to a lesser included offense instruction when: (1) each element of the lesser offense is a necessary element of the charged offense, and (2) the evidence supports an inference that the lesser offense was actually committed. *State v. Henderson*, ___ Wn.2d ___, 344 P.3d 1207, 1211 (2015) (citing *State v. Workman*, 90 Wn.2d 443, 447-48, 584 P.2d 382 (1978)).

Both Mr. Parker and the State agree the elements of third degree theft—wrongfully obtaining or exerting unauthorized control over the property of another with intent to deprive—are necessary elements of second degree robbery. RCW 9A.56.020, .050, .190, .210. The issue then is whether the evidence supports an inference that only third degree

theft was committed. We review the trial court's decision for abuse of discretion. *Henderson*, 344 P.3d at 1212.

Here, the evidence does not support an inference that only third degree theft occurred. Robbery involves the unlawful taking or retaining of property with the use of force or fear. *State v. Handburgh*, 119 Wn.2d 284, 293, 830 P.2d 641 (1992). Mr. Parker admitted a struggle occurred here, testifying that the Rite Aid employees grabbed him for no reason. Accordingly, his own testimony established he used force, and does not support an inference that he committed solely theft.

C. Ineffective Assistance of Counsel

The evidence of force shows Mr. Parker's claim of ineffective assistance of counsel lacks merit. To prove ineffective assistance of counsel, an appellant must show his attorney's performance fell below an objective standard of reasonableness and this deficiency prejudiced the defense. *Strickland v. Washington*, 466 U.S. 668, 687-88, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984). Mr. Parker contends his counsel should have moved at trial to dismiss the charge (erroneously referred to as "2nd degree assault" (statement of additional grounds for review at 1)), and should have sought dismissal on appeal on the basis that the evidence does not show that he used or threatened the use of force when taking the tequila. Because these challenges would not have been successful

at trial or on appeal, he cannot show prejudice to support a claim of ineffective assistance of counsel.

D. Offender Score

Mr. Parker assigns error to the trial court's inclusion of two prior Arkansas convictions in his offender score of 6. He contends the 2005 Arkansas convictions of residential burglary and theft of property are not legally comparable to Washington offenses and should have been excluded under RCW 9.94A.525(3). The State asserts this issue is moot because Mr. Parker has completed his confinement in Washington and is currently serving a sentence in an Arkansas prison. We agree.

An issue is moot if this court can no longer provide the requested relief. *State v. Ross*, 152 Wn.2d 220, 228, 95 P.3d 1225 (2004). We may still decide an issue, however, if it involves matters of continuing and substantial public interest. *State v. Hunley*, 175 Wn.2d 901, 907, 287 P.3d 584 (2012).

The remedy for an incorrect offender score is to remand to the superior court for resentencing with the correct score. *State v. Tili*, 148 Wn.2d 350, 358, 60 P.3d 1192 (2003). This resentencing may result in less confinement. *See Ross*, 152 Wn.2d at 228. Even if Mr. Parker returns to Washington to serve his term of community custody, and even if he receives a reduced sentence due to a remand for correction of the offender score, any excess time he served in prison cannot be credited toward his sentence of

community custody. *See State v. Jones*, 172 Wn.2d 236, 242-43, 257 P.3d 616 (2011). And he does not show that this issue involves matters of continuing and substantial public interest justifying a decision. Thus, because this court can no longer provide him effective relief, we find that the challenge of his offender score is moot.

Affirmed.

A majority of the panel has determined this opinion will not be printed in the Washington Appellate Reports, but it will be filed for public record pursuant to RCW 2.06.040.

Brown, A.C.J.

WE CONCUR:

Korsmo, J.

Fearing, J.

Thomas L. Parker
Delta Regional Unit
880 E. Gaines St.
Dermott, AR 71638

August 17, 2015

Temple of Justice
P.O. Box 40929
Olympia, WA 98504-0929

LETTER/AFFIDAVIT

RE: Motion to dismiss the case for an insufficient information. I, Thomas Parker was charged with Second-Degree Robbery. During a two day jury trial being on July 12, 2013, where for, the state contends that trial attorney did not motion to dismiss alleged charged offense of Second-Degree Robbery on the basis the information was deficient until after the state rested. However, it did not come to my notice until filing my petition for review that it was indicated in my trial transcript that my trial attorney made an objection on the faulty information and motioned to dismiss on the jury instructions, which was incorrect. However, I'm absolutely certain that it was at the commencement of trial, before the jury selection when the state introduced the faulty information, the state waited until the day of trial, whereby, trial counsel then moved to dismiss in open court immediately afterwards on the alleged offense at the outset of trial, before the state rested. But, however, the presiding judge rejected the motion on the information, before the state rested. In no uncertain terms, he [Judge Vanderschear] stated, "Ms. Kane, you have a valid point, but I will not grant the motion, spoken in open court duly recorded. Ms. Kane did in fact make the proper motion in a timely manner, before the state rested, and suddenly my transcript was [altered] or reconstructed to show that Ms. Kane motioned to dismiss after the state rested. I have resorted to a sworn affidavit that certain allegations at the time of my trial are true and correct to the best of my knowledge and belief.

Respectfully submitted,
Thomas L. Parker
Affiant, Pro-Se
ADC# 124141
Delta Regional Unit
880 E. Gaines St.
Dermott, AR 71638

State of Arkansas)
) §
County of Chicot)

Subscribed and sworn to before me, a Notary Public, on this 11th day of August, 2015.

Undray Fields
Notary Public

My commission expires: 8-18-2018

UNDRAY FIELDS
NOTARY PUBLIC-STATE OF ARKANSAS
CHICOT COUNTY
My Commission Expires 08-18-2018
Commission # 12371349