NO. 99593-1
(COA NO. 37090-9-III)

THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

IBRAHIM HASSAN,

Petitioner.

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

PETITION FOR REVIEW

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A. INTRODUCTION

The trial court instructed the jury that, to convict Ibrahim Hassan of first-degree trespass, it had to find he knew his entry or remaining in his wife's apartment was unlawful. In the next instruction, the court told the jury it did not need to find Mr. Hassan knew his conduct was unlawful.

Facing these conflicting instructions, the laypersons on the jury may have concluded they did not need to find Mr. Hassan's entry or remaining in the apartment was unlawful. As a result, the instructions relieved the prosecution of its burden of proof and deprived Mr. Hassan of due process.

Mr. Hassan's case presents the same issue as *State v. Weaver*, No. 99041-7, 196 Wn.2d 1036, 474 P.3d 1164 (2021). This Court should either grant Mr. Hassan's petition for review or stay consideration until it decides *Weaver*.

B. IDENTITY OF PETITIONER

Petitioner Ibrahim Hassan asks for review of the Court of Appeals's decision affirming his conviction of first-degree trespass.

C. COURT OF APPEALS DECISION

Mr. Hassan seeks review of the Court of Appeals's unpublished decision in *State v. Hassan*, No. 37090-9-III (Wash. Ct. App. Feb. 1, 2021). The Court of Appeals denied Mr. Hassan's motion for reconsideration on March 9, 2021.

D. ISSUE PRESENTED FOR REVIEW

Confusing jury instructions that relieve the prosecution of its burden to prove an element of the offense deprive an accused person of due process. The to-convict instruction required the jury to find Mr. Hassan knew his entry or remaining was unlawful, and the knowledge instruction said the jury did not need to find Mr. Hassan knew any fact was defined as unlawful. The Court of Appeals erred in holding these contradictory instructions did not relieve the prosecution of its burden to prove Mr. Hassan's knowledge.

E. STATEMENT OF THE CASE

Mr. Hassan confronted a man on the sidewalk near an apartment where Mr. Hassan's wife, Sayeda Hammed, and daughter, S.H., live. RP 212–13, 229–30, 253–55. A police

officer later found the blade of a kitchen knife on the sidewalk. RP 270. The prosecution's theory was that Mr. Hassan ran into the apartment, took a kitchen knife, and attacked the other man with it. RP 145–46, 371, 373–74. It charged Mr. Hassan with residential burglary. CP 28.

Ms. Hammed testified she and Mr. Hassan are separated and Mr. Hassan is not allowed in the apartment without an invitation. RP 161, 213. She and S.H. admitted, however, that Mr. Hassan was allowed to stay in the apartment in the past, once as long as two weeks. RP 161, 164, 219–20. Ms. Hammed also kept a spare key in a grill outside the apartment despite knowing Mr. Hassan knew where the key was. RP 161, 309–10. Mr. Hassan testified he regularly stays in the apartment and no one has ever told him he does not have permission to be there. RP 307–08, 323–24.

The court instructed the jury on the lesser included offense of first-degree trespass. CP 48; RP 358. Among the essential elements listed in the to-convict instruction was that Mr. Hassan "knew the entry or remaining was unlawful." CP

48; RP 358. The next instruction, on the other hand, said "[i]t is not necessary" that Mr. Hassan knew any fact in issue "is defined by law as being unlawful." CP 49; RP 359.

The jury acquitted Mr. Hassan of residential burglary but convicted him of first-degree trespass. CP 71, 73. The Court of Appeals affirmed. Slip op. at 10.

Mr. Hassan moved for reconsideration, or in the alternative to stay the appeal while this Court considers *State v. Weaver*. The Court of Appeals denied the motion.

F. WHY THIS COURT SHOULD ACCEPT REVIEW

The contradictory, confusing to-convict and knowledge instructions relieved the prosecution of its burden of proof, contrary to longstanding precedent requiring jury instructions to be manifestly clear.

Jury instructions must make the law "manifestly apparent to the average juror." *State v. Kyllo*, 166 Wn.2d 856, 864, 215 P.3d 177 (2009) (quoting *State v. LeFaber*, 128 Wn.2d 896, 900, 913 P.2d 369 (1996)). Instructions that might lead the jury to assume the prosecution does not need to prove an essential element violate due process. *State v. Stein*, 144 Wn.2d 236, 241, 27 P.3d 184 (2001). Instructions that reduce

the prosecution's burden are a manifest constitutional error reviewable for the first time on appeal. *Id.*; RAP 2.5(a)(3).

Contradictory jury instructions may relieve the prosecution of its burden of proof by confusing the jury into applying "an incorrect standard." *Kyllo*, 166 Wn.2d at 864–65. If the to-convict instruction required that Mr. Hassan knew a fact, but the knowledge instruction implied such knowledge is not necessary, the instructions in combination relieved the prosecution of its burden to prove the knowledge element and deprived Mr. Hassan of due process. *State v. Goble*, 131 Wn. App. 194, 203–04, 126 P.3d 821 (2005). "[T]he reviewing court cannot conclude that the jury followed the constitutional rather than the unconstitutional interpretation" of the contradictory instructions. *State v. McLoyd*, 87 Wn. App. 66, 71, 939 P.2d 1255 (1997) (citing *Sandstrom v. Montana*, 442 U.S. 510, 526, 99 S. Ct. 2450, 61 L. Ed. 2d 39 (1979)).

The to-convict instruction told the jury that, to convict Mr. Hassan of first-degree trespass, it had to find he "knew that the entry or remaining was unlawful." CP 48. In the next

instruction, the jury was told it did not have to find Mr. Hassan knew any "fact, circumstance, or result is defined by law as being unlawful." CP 49. The conflict between these two instructions could have confused the jury into believing it did not need to find Mr. Hassan knew his entry or remaining was unlawful, relieving the prosecution of its burden of proof. *Kyllo*, 166 Wn.2d at 864–65; *Goble*, 131 Wn. App. at 203–04.

In affirming Mr. Hassan's conviction, the Court of Appeals analyzed the text of the statute defining first-degree trespass and concluded it does not require a person to know his entry or remaining is unlawful. Slip op. at 6–8; *see* RCW 9A.52.070. The text of the statute is beside the point, however—what matters is the text of the instructions. While courts can "resolve the ambiguous wording of [a statute] via statutory construction, a jury lacks such interpretive tools and thus requires a manifestly clear instruction." *State v. Irons*, 101 Wn. App. 544, 550, 4 P.3d 174 (2000) (alteration in original) (quoting *LeFaber*, 128 Wn.2d at 902).

Whether the statute does or does not require knowledge of unlawfulness does not matter. Because the prosecution did not object to the to-convict instruction, it assumed the burden of proving Mr. Hassan knew he acted unlawfully under the law of the case. RP 91–92; *State v. Johnson*, 188 Wn.2d 742, 754–55, 399 P.3d 507 (2017). The next instruction suggested the jury did not have to find such knowledge, relieving the prosecution of the burden it assumed in the to-convict instruction and depriving Mr. Hassan of due process. *Stein*, 144 Wn.2d at 241; *Goble*, 131 Wn. App. at 203–04. Another panel of the Court of Appeals reached the same conclusion. *State v. Gallegos*, No. 36387-2-III, 2020 WL 3430075, at *7 (Wash. Ct. App. June 23, 2020) (unpub.); see GR 14.1(a).

To instruct the jury in a way that did not confuse the jury and relieve the prosecution of its burden would not have been difficult. The passage in the knowledge instruction that knowledge of unlawfulness is not required is in brackets in the pattern instruction, with a note that it be used "as applicable." WPIC 10.02 (note on use). Had the trial court

omitted the bracketed language, the knowledge instruction and to-convict instruction would not have been in conflict. CP 48, 49; WPIC 10.02.

The prosecution cannot show the confusing instructions were harmless beyond a reasonable doubt. *State v. Guloy*, 104 Wn.2d 412, 425, 705 P.2d 1182 (1985); *Neder v. United States*, 527 U.S. 1, 15–16, 119 S. Ct. 1827, 144 L. Ed. 2d 35 (1999). Though Ms. Hammed and S.H. insisted Mr. Hassan was not allowed in the apartment, Mr. Hassan described it as his "usual residence," and both testified Mr. Hassan had been allowed to stay there at least twice previously. RP 161, 219–20, 307, 323–24. This "conflicting evidence" as to whether Mr. Hassan knew his entry or remaining in Ms. Hammed's house was unlawful prevents the prosecution from proving the instructions were harmless. *Goble*, 131 Wn. App. at 203–04; *see Neder*, 527 U.S. at 18 ("omitted element" harmless where "supported by uncontroverted evidence").

The Court of Appeals's decision in this case is contrary to published opinions from this Court and the Court of

Appeals requiring that jury instructions be manifestly clear and hold the prosecution to its burden to prove all essential elements. *Kyllo*, 166 Wn.2d at 864–65; *Stein*, 144 Wn.2d at 241; *Goble*, 131 Wn. App. at 203–04; RAP 13.4(b)(1), (2). The result was a serious deprivation of Mr. Hassan's rights to due process and a fair trial. RAP 13.4(b)(3). This Court should grant review, or stay consideration until it decides *Weaver*.

G. CONCLUSION

This Court should grant review of the Court of Appeals's decision affirming Mr. Hassan's conviction of first-degree trespass, or stay consideration of Mr. Hassan's petition until it issues a decision in *Weaver*.

DATED this 23rd day of March, 2021.

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Petitioner's Appendix

A. Unpublished Opinion

B. Order Denying Motion For Reconsideration

APPENDIX A

FILED
FEBRUARY 1, 2021
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, Respondent, v. IBRAHIM SULIMAN HASSAN, Appellant.	)))))))))	No. 37090-9-III UNPUBLISHED OPINION

SIDDOWAY, J. — Ibrahim Hassan appeals his conviction for first degree criminal trespass, challenging the trial court's instructions to the jury, which he argues failed to consistently inform the jury of the State's burden to prove that he knew his conduct was defined by law as a crime. Knowledge that one is committing a crime is not an element of first degree trespass, however; the knowledge required is that one is not then licensed, invited, or otherwise privileged to so enter or remain. If the instructions had a shortcoming, it was not one that prejudiced Mr. Hassan.

The State concedes Mr. Hassan's second assignment of error to the trial court's allegedly inadvertent imposition of supervision fees.

We affirm Mr. Hassan's conviction and remand with directions to strike the language requiring him to pay supervision fees.

FACTS AND PROCEDURAL BACKGROUND

Little need by said about the circumstances leading to Ibrahim Hassan being charged with residential burglary with a domestic violence (DV) allegation and second degree assault with a deadly weapon allegation. After encountering a man at a Kennewick grocery store who had earlier accused Mr. Hassan of stealing his cell phone, Mr. Hassan badgered the man, suggesting that they fight. He then followed the man and his girlfriend to their nearby apartment, which was next door to the apartment where Mr. Hassan's estranged wife lived with their two daughters. Mr. Hassan entered his estranged wife's apartment to obtain a knife, which he then used to assault the man who had accused him of the theft.

Neither Mr. Hassan's wife nor her daughters were home at the time. Mr. Hassan's wife and one of his daughters testified at Mr. Hassan's trial that he lived in Seattle and did not have permission to be in their Kennewick apartment without an explicit invitation from the wife or daughters. Mr. Hassan disputed their testimony, claiming he had a key to the apartment, knew where one was secreted outside, and was permitted to come and go as he pleased.

At trial, the trial court granted Mr. Hassan's request to give an instruction on first degree criminal trespass as a lesser included crime to the residential burglary charge. The trial court gave the following instructions relevant to first degree criminal trespass:

INSTRUCTION NO. 10

A person enters or remains unlawfully in or upon premises when he or she is not then licensed, invited, or otherwise privileged to so enter or remain.

Clerk's Paper's (CP) at 43.

INSTRUCTION NO. 14

A person commits the crime of Criminal Trespass in the First Degree when he or she knowingly enters or remains unlawfully in a building.

CP at 47.

INSTRUCTION NO. 15

To convict the defendant of the crime of Criminal Trespass in the First Degree, each of the following elements of the crime must be proved beyond a reasonable doubt:

(1) That on or about March 4, 2019, the defendant knowingly entered or remained in a building;

(2) That the defendant knew that the entry or remaining was unlawful; and

(3) That this act occurred in the County of Benton, 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.

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.

CP at 48.

INSTRUCTION NO. 16

A person knows or acts knowingly or with knowledge with respect to a fact, circumstance, or result when he or she is aware of that fact,

> circumstance, or result. It is not necessary that the person know that the fact, circumstance, or result is defined by law as being unlawful or an element of a crime.
>
> If a person has information that would lead a reasonable person in the same situation to believe that a fact exists, the jury is permitted but not required to find that he or she acted with knowledge of that fact.
>
> When acting knowingly as to a particular fact is required to establish an element of a crime, the element is also established if a person acts intentionally as to that fact.

CP at 49. The defense raised no objection to these instructions.

The jury found Mr. Hassan guilty of first degree criminal trespass and the second degree assault and made the DV and deadly weapon findings requested by the State. In sentencing Mr. Hassan, the trial court found him indigent and imposed only mandatory legal financial obligations (LFOs), yet it made no modification to boilerplate language in the judgment and sentence (J&S) that required Mr. Hassan to pay supervision fees. Mr. Hassan appeals.

ANALYSIS

I. THE TRIAL COURT'S INSTRUCTIONS TO THE JURY DID NOT MISSTATE THE ELEMENTS OF FIRST DEGREE CRIMINAL TRESPASS AS ALLEGED BY MR. HASSAN

The only contested issue on appeal is whether instruction 16 erroneously and confusingly informed jurors that to be criminally liable, Mr. Hassan did not need to know his conduct was defined by law as a crime. Whether this was error turns on Mr. Hassan's contention that "first-degree trespass . . . unlike most crimes, requires the defendant knew that [his or her] conduct was unlawful." Br. of Appellant at 10.

While the challenge to the instruction is raised for the first time on appeal, a jury instruction that relieves the State of proving every essential element of a crime beyond a reasonable doubt is manifest constitutional error. *State v. Stein*, 144 Wn.2d 236, 241, 27 P.3d 184 (2001). An alleged error of law in a jury instruction is reviewed de novo. *State v. Hayward*, 152 Wn. App. 632, 641, 217 P.3d 354 (2009).

Mr. Hassan cites no reported decision that holds that knowing one's conduct violates a law is an essential element of first degree criminal trespass. We reject that construction of RCW 9A.52.070(1).

Our fundamental objective in construing a statute is to ascertain and carry out the legislature's intent, and if a statute's meaning is plain on its face, we give effect to that plain meaning as an expression of legislative intent. *Dep't of Ecology v. Campbell & Gwinn*, 146 Wn.2d 1, 9-10, 43 P.3d 4 (2002). "Plain meaning" analysis does not mean that we view a statutory provision in isolation, however; instead, "meaning is discerned from all that the [l]egislature has said in the statute and related statutes which disclose legislative intent about the provision in question." *Id.* at 11.

We will begin with the general and move to the specific. "RCW 9A.08.010 enumerates four degrees of criminal culpability: intent, knowledge, recklessness, and criminal negligence." *State v. Atsbeha*, 142 Wn.2d 904, 926, 16 P.3d 626 (2001) (Sanders, J., dissenting). The statute provides, as to knowledge:

A person knows or acts knowingly or with knowledge when:

> (i) he or she is aware of *a fact, facts, or circumstances or result* described by a statute defining an offense; or
>
> (ii) he or she has information which would lead a reasonable person in the same situation to believe that *facts exist* which facts are described by a statute defining an offense.

RCW 9A.08.010(1)(b) (emphasis added). Culpability is not defined with reference to knowledge of the law, because ignorance of the law is not an excuse. One of the "long-standing and basic principles upon which our legal system depends [is] that all sane persons are presumed to know the law and are in law held responsible for their free and voluntary acts and deeds." *State v. Spence*, 81 Wn.2d 788, 792, 506 P.2d 293 (1973), *rev'd sub nom. on other grounds* by *Spence v. Washington*, 418 U.S. 405, 94 S. Ct. 2727, 41 L. Ed. 2d 842 (1974).

RCW 9A.52.070(1), which defines the crime of first degree criminal trespass, is consistent with these principles. It provides that "[a] person is guilty of criminal trespass in the first degree if he or she knowingly *enters or remains unlawfully* in a building." (Emphasis added.) We emphasize "enters or remains unlawfully" because it is a defined phrase for purposes of chapter 9A.52 RCW. RCW 9A.52.010(2) provides that "[a] person 'enters or remains unlawfully' in or upon premises when he or she is not then licensed, invited, or otherwise privileged to so enter or remain." Instruction 10 told Mr. Hassan's jury that this is the meaning of "enters or remains unlawfully." Given the definition, to prove first degree criminal trespass, the State was required to prove that a

person (1) enters or remains in a building, and (2) does so knowing that he or she is not licensed, invited or otherwise privileged to so enter or remain.

"It is an axiom of statutory interpretation that where a term is defined we will use that definition." *United States v. Hoffman*, 154 Wn.2d 730, 741, 116 P.3d 999 (2005). Mr. Hassan ignores RCW 9A.52.010(2)'s definition of "enters or remains unlawfully," however. He breaks up the phrase, with the result that the concepts of license, invitation, or privilege are gone. Instead, what he contends the State must prove to establish first degree criminal trespass is that a person (1) enters or remains in a building, and (2) does so knowing he is violating a law.

Mr. Hassan's construction conflicts with *City of Bremerton v. Widell*, 146 Wn.2d 561, 570, 51 P.3d 733 (2002), which implicitly construes the criminal trespass statute as we do—according to its plain language, and heeding the defined phrase "enters or remains unlawfully." The *Widell* court addressed one of the statutory defenses to criminal trespass: the defense that "[t]he actor reasonably believed that the owner of the premises, or other person empowered to license access thereto, would have licensed him or her to enter or remain." RCW 9A.52.090(3). It held that once a defendant has offered some evidence that his or her presence was permissible under this provision, the State bears the burden to prove beyond a reasonable doubt that the defendant lacked license to enter, because the defendant's reasonable belief in his license "negate[s] the unlawful

presence element of criminal trespass and [is] therefore not [an] affirmative defense[ ]." *Widell*, 146 Wn.2d at 570.

If the criminal trespass statute had the meaning given it by Mr. Hassan, then the unlawful presence element of criminal trespass would be that the defendant knew he was violating a law, not that he reasonably believed that he was licensed by the owner to remain.

Tellingly, Mr. Hassan never argued at trial that jurors should acquit him because he was ignorant of the law. The defense's closing argument, like the State's, consistently addressed whether Mr. Hassan reasonably believed he had permission to enter his wife's apartment without an invitation—not what he knew or did not know about the law. *See, e.g.*, Report of Proceedings at 385-86 ("He has license. He's been invited. He has a key. He has a right to be there.").

Mr. Hassan argues that instruction 16 is the problem, but if any of the instructions could be improved it is subsection (2) of the pattern elements instruction, which, after telling jurors that the State must prove the defendant's knowing entry or remaining in a building, tells them the State must prove beyond a reasonable doubt "[t]hat the defendant knew that the entry or remaining was unlawful." *See* 11A WASHINGTON PRACTICE, JURY INSTRUCTIONS: CRIMINAL § 60.16, at 21 (4th ed. 2016). Like Mr. Hassan's argument, this breaks up the defined phrase "enters or remains unlawfully." Subsection (2) would be improved by stating "that the defendant knew he was entering or remaining

unlawfully." If this is a shortcoming in the instruction, however, it did not prejudice Mr. Hassan.

The trial court's instructions did not misstate the law.

II. WE ACCEPT THE PARTIES' AGREEMENT THAT THE TRIAL COURT INADVERTENTLY FAILED TO STRIKE THE REQUIREMENT THAT MR. HASSAN PAY SUPERVISION FEES

Mr. Hassan is required by his sentence to be on community custody for 18 months. Boilerplate language in his J&S provides that while on community custody, he shall "pay supervision fees as determined by DOC."[1] CP at 82; J&S, subsection 4.2(B)(7) at 6. Mr. Hassan contends that such fees are a discretionary cost that cannot be imposed on a defendant who is indigent, as he was found to be. Alternatively, he argues that the failure to waive his obligation for the fees was inadvertent and should be deemed a clerical error.

RCW 9.94A.703(2)(d) provides that "[u]nless waived by the court, as part of any term of community custody, the court shall order an offender to: . . . [p]ay supervision fees as determined by the DOC." Since the fees are waivable by the trial court, they are discretionary LFOs, but better-reasoned cases hold that they are not a "cost" that RCW 10.01.160 provides "shall not" be imposed on an indigent defendant. *E.g.*, *State v. Spaulding*, ___ Wn. App. 2d ____, 476 P.3d 205, 211 (2020). Since the parties agree that the trial court intended to impose only mandatory LFOs, however, we deem the

[1] The Washington State Department of Corrections.

unmodified boilerplate language to be a clerical error and will direct the trial court to strike it.

The conviction is affirmed and the case remanded with directions to strike the language requiring Mr. Hassan to pay supervision fees as determined by DOC.

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.

Siddoway, A.C.J.

WE CONCUR:

Korsmo, J.P.T.[2]

Fearing, J.

[2] Judge Kevin M. Korsmo was a member of the Court of Appeals at the time argument was held on this matter. He is now serving as a judge pro tempore of the court pursuant to RCW 2.06.150.

APPENDIX B

FILED
MARCH 9, 2021
In the Office of the Clerk of Court
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COURT OF APPEALS, DIVISION III, STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent, v. IBRAHIM SULIMAN HASSAN, Appellant.	)))))))))	No. 37090-9-III ORDER DENYING MOTION FOR RECONSIDERATION

THE COURT has considered Appellant's motion for reconsideration and is of the opinion the motion should be denied. Therefore,

IT IS ORDERED, the motion for reconsideration of this court's decision of February 1, 2021, is hereby denied.

PANEL: Judges Siddoway, Korsmo, Fearing

FOR THE COURT:

REBECCA L. PENNELL
Chief Judge

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,	)	
	)	
RESPONDENT,	)	
	)	
v.	)	COA NO. 37090-9-III
	)	
IBRAHIM HASSAN,	)	
	)	
PETITIONER.	)	

DECLARATION OF DOCUMENT FILING AND SERVICE

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SIGNED IN SEATTLE, WASHINGTON THIS 23RD DAY OF MARCH, 2021.

X_____

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