No. 30411-6-III
IN THE COURT OF APPEALS
FOR THE STATE OF WASHINGTON
DIVISION III

STATE OF WASHINGTON,

Plaintiff/Respondent,

vs.

FABIAN ARREDONDO,

Defendant/Appellant.

Appellant's Reply Brief

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A. ADDITIONAL ASSIGNMENTS OF ERROR[1]

1. The trial court erred in finding that the judge conducted a *Bone Club* analysis; that there was a compelling need or interest in concluding jury selection that day, even if it meant going past 4 PM., so as not to delay another homicide trial that was scheduled to start the next day; that the method selected was the least restrictive for public access; that the competing interests were weighed by the court; that if the public right to trial was curtailed at all, it was just for minutes only and for an innocuous part of the trial; that the amount of time between the jury being sworn and the adjournment was only for a few minutes; that on the 11th of October, the court was recessed at 4:10 not at 4:17, which is the incorrect time, from the JAVS recording noted in the report of proceedings. Finding of Fact No. 4, CP 113.

2. The trial court erred in finding, "In [sic] October 10, 2011 and October 11, 2011, the public entrance of the Yakima County Courthouse was not closed or locked at 4:00p.m. because a courtroom was still in session in which case security officers kept the public entrance open until all courts were no longer in session for that day. Yakima County's policy

[1] Since the findings/conclusions from the evidentiary hearing on remand were not entered until after Appellant's initial brief was filed, error is assigned to them now. Appellant's initial brief was filed 9/21/12. The evidentiary hearing was held 6/27/13. The findings/conclusions were entered 7/26/13.

was that the public entrance remained open as long as any courtroom was in session. The courts and security officers followed this policy." Finding of Fact No. 5, CP 114.

3. The trial court erred in finding, "To implement this policy, late in the afternoon every day, security officers checked to determine which courtrooms remained in session. Security officers used various means to check. They visually checked courtrooms. They asked courtroom clerks if courtrooms were still in session. From their office or where they were situated, the security officers were stationed near the public entrance to see if anyone would come in after normal court hearings were over." Finding of Fact No. 6, CP 114.

4. The trial court erred in finding, "On October 11, 2011, the public entrance of the Yakima County Courthouse was open at all times when the Fabian Arredondo trial was in session. At no time was the public entrance of the Yakima County Courthouse closed while the Fabian Arredondo trial was in session. Security officers ensured that the public entrance to the Yakima County Courthouse remained open and that all members of the public had access to the courtroom while the Fabian Arredondo trial was in session. Even though other county offices may have been closed, security officers admitted any member of the public who

came to the public entrance if he or she wanted to attend the Fabian Arredondo trial and directed him or her to the courtroom. No member of the public who desired to attend the Fabian Arredondo trial was prevented from attending any session." Finding of Fact No. 7, CP 114-15.

5. The trial court erred in finding, "[T]he public entrance of the courthouse always remained open if a courtroom was still in session despite the sign." Finding of Fact No. 8, CP 115.

6. The trial court erred in finding, "No member of the public was deterred by the sign described in finding of fact 8 from entering the Yakima County Courthouse and attending any session of the Fabian Arredondo trial. In the security officers' experience, members of the public always tried the door despite the sign before walking away from the public entrance. No member of the public was barred from entering the courthouse or attending any session of the Fabian Arredondo trial by the sign. For the twenty one months since the policy has been implemented, there was accommodation made to anyone who came to the door of the courthouse and was allowed in." Finding of Fact No. 9, CP 115.

7. The trial court erred in concluding, "Fabian Arredondo's right to a public trial under article I, section 22 of the Washington State

Constitution and the Sixth Amendment to the United States Constitution was not violated." Conclusion of Law No. 2, CP 117.

8. The trial court erred in concluding, "The public's right to open administration of justice under Article I, section 10 of the Washington State Constitution was not violated. The public's right to an open trial under the First Amendment to the United States Constitution was not violated." Conclusion of Law No. 3, CP 117.

B. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. Were the findings of fact and conclusions of law from the evidentiary hearing on remand erroneous, speculative and not supported by the record?

2. Should the challenged findings of fact and conclusions of law from the evidentiary hearing on remand be stricken because they are unsupported by the evidence, tailored to meet the issues presented in the appellant's brief, and not contemplated in the order on remand?

3. Did the trial court violate Mr. Arredondo's constitutional right to a public trial by allowing the trial to continue past 4 p.m. during a portion of the jury selection, when a sign on the courthouse door indicated the courthouse closed at 4 p.m., thereby effectively excluding the public from portions of the trial without first doing a *Bone-Club* analysis.

C. STATEMENT OF THE CASE

The facts are set forth in Appellant's initial brief and are incorporated herein. While this appeal was ongoing, the Court of Appeals remanded the matter for the taking of additional evidence to determine whether the courthouse doors were locked at 4 p.m. on any day of the trial in this matter and if so, whether that closure barred entry to the ongoing courtroom proceedings. Commissioner's Ruling 3/7/13; Respondent's Motion to Remand 3/6/13. The Commissioner's Ruling ordering the remand states,"[T]his matter is remanded to the trial court for the taking of additional evidence." Commissioner's Ruling, March 7, 2013.

The following additional facts were brought out at the evidentiary hearing on remand held 6/27/13. At the time of Arredondo's trial the Yakima County Courthouse hours were 8 a.m. to 4 p.m. The policy in effect was if a trial was still ongoing past 4 p.m., the court would call courthouse security to let them know court was still in session. A security officer would then be available to admit people wishing to attend that particular court hearing. However, the courthouse was formally closed for all other purposes. 6/27/13 RP 11, 42-43. If they had sufficient staff available, security officers would check to make sure no courts were still in session before locking the doors at 4 p.m. 6/27/13 RP 11-12.

The sign in place inside the courthouse near the only entrance door said, "Courthouse closes at 4:00 p.m. Office hours, auditor 9:00 to 3:30, HR [human resources] 9:00 to 4:00, DC [district court] clerks 8:00 to 4:00, SC [superior court] clerks 8:30 to 4:00, all others 8:00 to 4:00." The bottom line on the sign says "court closes at 5:00 p.m." A similar sign was posted on the outside of the exterior entrance door. 6/27/13 RP 14-19, 21; Ex. L & M. Harold Delia, a court consultant for seven years and former court administrator for five years, admitted on cross examination that the signs could be interpreted to mean a person would have to actually be inside the building prior to 4 p.m. to attend a court session going beyond 4 p.m. 6/27/13 RP 51.

The security officer on duty after 4 p.m. does not stand by the entrance doors. Instead, he or she stands near the metal detector 40-50 feet south of the entrance doors or at a desk in an office opposite the entrance doors. A person approaching the entrance doors from the street would only see the closed sign, not the security officer if the officer was posted by the metal detector. The person could only see the security officer by the metal detector if he or she entered the first set of entrance doors and peered through the second set of doors at an angle. 6/27/13 RP 22.

Officer Kacy Seibol, a security officer on duty on the days in question, testified (s)he did not believe a member of the public who approached the entrance door and read the sign could see any of the officers on duty because none of the officers stand directly in front of the doors. 6/27/13 RP 66-67. Officer Seibol did not recall where in the building (s)he was posted on the days in question. 6/27/13 RP 65. Officer Ron Rogers, another security officer on duty on the days in question, testified the entrance doors were locked at 4 p.m. If a member of the public wanted in the building to watch the trial, he or she would need to knock or pull on the door to get the security officer's attention. The officer would then ask the person why he or she was there. If the person indicated it was for court, the officer would allow that person to enter the building. 6/27/13 RP 61, 67.

Officer Seibol acknowledged on cross examination that there could have been members of the public who approached the entrance doors, read the sign and just left without trying to get the security guard's attention. 6/27/13 RP 68.

Additional facts will be included in the Argument.

D. ARGUMENT

1. The findings of fact and conclusions of law from the evidentiary hearing on remand were erroneous, speculative and not supported by the record.

Finding of Fact No. 4.

In this lengthy finding the trial court first found that the judge conducted a *Bone Club*[2] analysis; that there was a compelling need or interest in concluding jury selection that day, even if it meant going past 4 PM., so as not to delay another homicide trial that was scheduled to start the next day; that the method selected was the least restrictive for public access; and that the competing interests were weighed by the court. CP 113.

This portion of the finding is erroneous and unsupported by the record. The Court did not conduct a *Bone-Club* analysis. The Court merely stated without any preliminary analysis:

> I'll make the finding that the need to conclude the jury selection process this afternoon is an extraordinary circumstance warranting us going past four o'clock and potentially conducting the—some small portion of the jury selection process in an open courtroom in a locked courthouse.

Supp. RP 240.

[2] *State v. Bone-Club*, 128 Wn.2d 254, 906 P.2d 325 (1995).

Contrary to its finding, the Court did not satisfy any of the criteria for a *Bone-Club* analysis. It failed to demonstrate any compelling need to complete jury selection that day. No one present was given an opportunity to object to the closure. There was no showing that closure was the least restrictive means available. The court did not weigh the competing interests of the proponent of closure and the public. And there was no showing that the order was no broader in its application or duration than necessary to serve its purpose. See *Bone-Club*, 128 Wn.2d at 258-89; *Federated Publications, Inc. v. Kurtz*, 94 Wn.2d 51, 62, 615 P.2d 440 (1980).

The Court also found that if the public right to trial was curtailed at all, it was just for minutes only and for an innocuous part of the trial; that the amount of time between the jury being sworn and the adjournment was only for a few minutes; that on the 11th of October, the court was recessed at 4:10 not at 4:17, which is the incorrect time, from the JAVS recording noted in the report of proceedings. Finding of Fact No. 4, CP 113.

Finding that jury selection is "an innocuous part of the trial" is more of a legal conclusion but none the less incorrect. The process of jury selection is important to the criminal justice system itself as well as to the parties. *Press-Enter. Co. v. Superior Court*, 464 U.S. 501, 505, 104 S. Ct.

819, 78 L. Ed. 2d 629 (1984). Even where only a part of the jury voir dire is improperly closed, it can violate a defendant's constitutional public trial right. *In re Personal Restraint of Orange*, 152 Wn.2d 795, 812, 100 P.3d 291 (2004).

In addition, the record does not support the Court's finding that the JAVS recording system time was incorrect. Although the Court made reference to this contention in its opening remarks (6/27/13 RP 2), there was no testimony to support it. In fact former court administrator Harold Delia testified he was unaware if the JAVS recording system time was incorrect and no one had ever complained about it. 6/27/13 RP 47.

Finding of Fact No. 5.

In this finding, which is more of a conclusion, the trial court found, "In [sic] October 10, 2011 and October 11, 2011, the public entrance of the Yakima County Courthouse was not closed or locked at 4:00p.m. because a courtroom was still in session in which case security officers kept the public entrance open until all courts were no longer in session for that day. Yakima County's policy was that the public entrance remained open as long as any courtroom was in session. The courts and security officers followed this policy." CP 114.

This finding is also erroneous and unsupported by the record. Ron Rogers, a security officer on duty on the days in question, testified the entrance doors were locked at 4 p.m. If a member of the public wanted in to watch the trial, he or she would need to knock or pull on the door to get the security officer's attention. 6/27/13 RP 61, 67. There could not be a more credible witness concerning whether or not the door was locked than the officer who was actually on duty on the days in question.

While there may have been a policy in effect that the court would call courthouse security to let them know court was still in session if a trial was still ongoing past 4 p.m., there was no testimony that this actually occurred. 6/27/13 RP 11, 42-43. In fact the Court made no statement during the trial about calling security when it announced it would conclude jury selection "in an open courtroom in a locked courthouse." Supp. RP 240. Therefore, it is extremely doubtful any such phone call was made.

There was also a policy that security officers would check to make sure no courts were still in session before locking the doors at 4 p.m. if they had sufficient staff available. 6/27/13 RP 11-12. But there was no testimony that this policy was followed on the days in question, contrary to the Court's finding.

Finding of Fact No. 6.

In the first portion of this finding the Court found, "To implement this policy, late in the afternoon every day, security officers checked to determine which courtrooms remained in session. Security officers used various means to check. They visually checked courtrooms. They asked courtroom clerks if courtrooms were still in session." CP 114. This portion of the finding is again erroneous and unsupported by the record. There was no testimony that any of this was done on the days in question.

The Court also found, "From their office or where they were situated, the security officers were stationed near the public entrance to see if anyone would come in after normal court hearings were over." Finding of Fact No. 6, CP 114. This portion of the finding is also erroneous and unsupported by the record. The testimony revealed that the security officer on duty after 4 p.m. does not stand by the entrance doors. Instead, he or she stands near the metal detector 40-50 feet south of the entrance doors or at a desk in an office opposite the entrance doors. A person approaching the entrance doors from the street would only see the closed sign, not the security officer if the officer was posted by the metal detector. The person could only see the security officer by the metal detector if he or

she entered the first set of entrance doors and peered through the second set of doors at an angle. 6/27/13 RP 22.

Moreover, Officer Kacy Seibol, a security officer on duty on the days in question, testified (s)he did not recall where in the building (s)he was posted on the days in question. Officer Seibol also did not believe a member of the public who approached the entrance door and read the sign could see any of the officers on duty because none of the officers stand directly in front of the entrance doors. 6/27/13 RP 65-67.

Finding of Fact No. 7.

In this finding, which is again more of a conclusion, the Court found, "On October 11, 2011, the public entrance of the Yakima County Courthouse was open at all times when the Fabian Arredondo trial was in session. At no time was the public entrance of the Yakima County Courthouse closed while the Fabian Arredondo trial was in session. Security officers ensured that the public entrance to the Yakima County Courthouse remained open and that all members of the public had access to the courtroom while the Fabian Arredondo trial was in session. Even though other county offices may have been closed, security officers admitted any member of the public who came to the public entrance if he or she wanted to attend the Fabian Arredondo trial and directed him or her

to the courtroom. No member of the public who desired to attend the Fabian Arredondo trial was prevented from attending any session." CP 114-15.

This finding is also erroneous and unsupported by the record. As noted previously, Officer Ron Rogers testified the entrance doors were locked at 4 p.m. 6/27/13 RP 61, 67. Officer Seibol acknowledged there could have been members of the public who approached the entrance doors, read the sign and just left without trying to get the security guard's attention. 6/27/13 RP 68. Based on this testimony and contrary to the Court's presumptive conclusion, there was no legitimate basis to conclude "no member of the public who desired to attend the Fabian Arredondo trial was prevented from attending any session."

Finding of Fact No. 8.

Here the Court found, "[T]he public entrance of the courthouse always remained open if a courtroom was still in session despite the sign." CP 115. This finding is clearly refuted by Officer Rogers' testimony that the entrance doors were locked at 4 p.m. 6/27/13 RP 61, 67. It is also refuted by the lack of any testimony that the security officers were informed or were even aware that any court was still in session.

Finding of Fact No. 9.

Here the Court erroneously found, "No member of the public was deterred by the sign described in finding of fact 8 from entering the Yakima County Courthouse and attending any session of the Fabian Arredondo trial. In the security officers' experience, members of the public always tried the door despite the sign before walking away from the public entrance. No member of the public was barred from entering the courthouse or attending any session of the Fabian Arredondo trial by the sign. For the twenty one months since the policy has been implemented, there was accommodation made to anyone who came to the door of the courthouse and was allowed in." CP 115.

This finding is also refuted by Officer Seibol's acknowledgement that there could have been members of the public who approached the entrance doors, read the sign and just left without trying to get the security guard's attention. 6/27/13 RP 68. In that situation the security guard would not be aware of the person's presence.

The finding is also refuted by Harold Delia's testimony, where he acknowledged that the signs could be interpreted to mean a person would have to actually be inside the building prior to 4 p.m. to attend a court session going beyond 4 p.m. 6/27/13 RP 51.

Conclusions of Law Nos. 2 and 3.

The Court erroneously concluded, "Fabian Arredondo's right to a public trial under article I, section 22 of the Washington State Constitution and the Sixth Amendment to the United States Constitution was not violated. The public's right to open administration of justice under Article I, section 10 of the Washington State Constitution was not violated. The public's right to an open trial under the First Amendment to the United States Constitution was not violated." CP 117.

These conclusions are unsupported by the evidence as illustrated by the Court's erroneous findings, discussed *supra*, that were unsupported by the evidence. Moreover, if the public is not "aware" of the open and public proceedings, the right to an open and public trial loses all meaning. *Press-Enter. Co. v. Superior Court*, 464 U.S. 501, 509, 104 S. Ct. 819, 78 L. Ed. 2d 629 (1984). The trial court, herein, effectively closed the courtroom on its own motion by conducting portions of the trial after 4 p.m. when the courthouse was formally closed and a sign on the entrance door stated the courthouse was closed. Since the Court did not conduct a *Bone-Club* analysis, it violated Mr. Arredondo's constitutional right to a public trial.

2. The challenged findings of fact and conclusions of law from the evidentiary hearing on remand should be stricken because they are unsupported by the evidence, tailored to meet the issues presented in the appellant's brief, and not contemplated in the order on remand.

"A trial court's erroneous determination of facts, unsupported by substantial evidence, will not be binding on appeal.... This strikes the proper balance between protecting the rights of the defendant, constitutional or otherwise, and according deference to the factual determinations of the actual trier of fact." *State v. Broadaway*, 133 Wash. 2d 118, 131, 942 P.2d 363 (1997), quoting *State v. Hill*, 123 Wash.2d 641, 647, 870 P.2d 313 (1994). Findings which are unsupported by the evidence presented at trial must be stricken. *Id*. Therefore, findings of fact 4-9 should be stricken.

A simple reading of these findings and conclusions also reveals they are completely tailored to Appellant's opening brief filed 9/21/12. Findings and conclusions that are tailored to meet the issues presented in the appellant's brief is grounds for reversal. *State v. Brockob*, 159 Wash.2d 311, 344, 150 P.3d 59 (2006); *State v. Gaddy*, 114 Wash.App. 702, 705, 60 P.3d 116 (2002). Herein, the so-called findings of fact are interspersed with legal conclusions clearly tailored to the public trial issue

raised in Appellant's opening brief. The conclusions of law are equally tailored. On that basis the convictions should be reversed or in the alternative, the findings and conclusions should be stricken in their entirety.

Lastly, the findings and conclusions should be stricken or at least disregarded on appeal because they were not contemplated in either the motion or order on remand. The State's motion was to remand the case for additional evidence on review. It does not ask for findings and conclusions. State's Motion to Remand, dated 3/6/13. Similarly, the Commissioner's Ruling ordering the remand states only that "[T]his matter is remanded to the trial court for the taking of additional evidence." See Commissioner's Ruling, March 7, 2013. The object was only to obtain additional facts pertinent to the potential public trial issue. There was no request for findings/conclusions in either the motion to remand or subsequent ruling in either case.[3] Moreover, the conclusion of law that there was no public trial violation is the ultimate issue to be decided by this Court and not the trial court. Therefore, the findings and conclusions should be stricken on appeal.

[3] Trial defense counsel objected to the entering of any conclusions of law for this same reason. 7/26/13 RP 103-04.

3. The trial court violated Mr. Arredondo's constitutional right to a public trial by allowing the trial to continue past 4 p.m. during a portion of the jury selection, when a sign on the courthouse door indicated the courthouse closed at 4 p.m., thereby effectively excluding the public from portions of the trial without first doing a *Bone-Club* analysis.

The underlying theme of Respondent's Brief on this issue, as well as the trial court's findings and conclusions[4], is that no public trial violation occurs unless it can be shown that a member of the public attempted entry to the courthouse and was somehow turned away. Respondent's Brief pp 3-9. This has never been the legal inquiry in any jurisdiction for determining whether a public trial violation has occurred. Instead, the proper inquiry is whether a closure occurred and if it did, whether the trial court conducted a proper *Bone-Club* analysis. See Appellant's Initial Brief pp 13-15; *State v. Bone-Club*, 128 Wn.2d 254, 258-59, 906 P.2d 325 (1995); *In re Personal Restraint of Orange*, 152 Wn.2d 795, 100 P.3d 291 (2004); *Waller v. Georgia*, 467 U.S. 39, 45, 104 S. Ct. 2210, 81 L. Ed. 2d 31 (1984). Appellant is not required to prove that some member of the public was actually denied entry.

[4] See the introductory paragraph to the Court's Findings/Conclusions which states: "The issue was whether the public entrance to the courthouse was closed while trial was in session and, if so, whether the public was denied access to the courtroom." CP 111.

Due process guarantees the right to an open and public trial. If the public is not "aware" of the open and public proceedings, this right loses all meaning. *Press-Enter. Co. v. Superior Court*, 464 U.S. 501, 509, 104 S. Ct. 819, 78 L. Ed. 2d 629 (1984). Even if a courthouse is technically unlocked, secret proceedings unfairly diminish or eliminate this public trial right. *Id*. The law requires "reasonable measure to accommodate public attendance" at court proceedings. *State v. Leyerle,* 158 Wn. App. 474, 478, 242 P.3d 921 (2010); *Presley v. Georgia*, 558 U.S. 209, 130 S.Ct. 721, 175 L.Ed.2d 675 (2010). Moreover, court proceedings must not only be open, but they must be "accessible." *Leyerle*, 158 Wn. App. at 479-80; *State v. Easterling*, 157 Wn.2d 167, 174, 137 P.3d 825 (2006)

Yakima County's policy of closing the courthouse at 4:00 p.m. while having a security guard available to admit people during times of trial is not a reasonable measure to accommodate public attendance. Seeing the sign outside the courthouse that the building is closed, the public is unlikely to be aware it may still enter the building for an ongoing trial afterhours. This point is reinforced by Harold Delia's testimony, where he acknowledged that the signs could be interpreted to mean a person would have to actually be inside the building prior to 4 p.m. to attend a court session going beyond 4 p.m. 6/27/13 RP 51.

In addition, the posted internet hours on the Yakima County website, made public as follows after the courthouse hours changed in 2011, further reinforces this point by unequivocally informing the public that the courthouse closes at 4 p.m.:

> **Superior Court**
> **Location:** Yakima County Courthouse, Rm. 323
> **Hours of Operation:** *8:30 - 4:00 pm*[5]
> **Phone:** (509)574-2710

http://www.yakimacounty.us/departme.asp#S (Available 9/25/2013) (emphasis added by italics).

Having a security guard available to admit people who wish to attend court proceedings after 4 p.m., when the information disseminated to the public says the courthouse closes at 4:00 p.m., does not constitute "reasonable measures" to "accommodate public attendance." It is difficult to imagine many members of the general public who would be brave enough to assert the public trial right and enter the courthouse after 4 p.m. when the posted hours, as well as the internet hours, announce the courthouse is in fact closed.

[5] Interestingly, approximately one year after Appellant's brief was filed 9/21/2012, the following language was added after these posted hours of operation on the website: "*Exception: Courthouse will remain open for public attending trials/hearings that go past 4:00 p.m."* http://www.yakimacounty.us/departme.asp#S (Available 1/24/2014) (emphasis added).

In summation, the measures taken in this case by the Yakima County Superior Court did not make the courthouse sufficiently "accessible," did not make the public "aware" of the ongoing public trial, and were not "reasonable" to "accommodate public attendance." The trial court effectively closed the courtroom on its own motion by conducting portions of the trial after 4 p.m. when the courthouse was formally closed. It did not conduct a *Bone-Club* analysis. Therefore, significant portions of Mr. Arredondo's trial were improperly closed to the public and his conviction should be reversed in favor of a new and public trial.

E. CONCLUSION

Respondent's arguments on the remaining issues are adequately addressed in Appellant's initial brief and will not be repeated here.

For the reasons stated herein and in Appellant's initial brief, the convictions should be reversed, and the case remanded for a new trial. The findings and conclusions from the evidentiary hearing on remand should be stricken in their entirety on appeal.

Respectfully submitted June 19, 2014,

s/David N. Gasch, WSBA #18270
Attorney for Appellant

PROOF OF SERVICE (RAP 18.5(b))

I, David N. Gasch, do hereby certify under penalty of perjury that on June 19, 2014, I mailed to the following by U.S. Postal Service first class mail, postage prepaid, or e-mailed by prior agreement (as indicated), a true and correct copy of the reply brief of appellant:

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