NO. 97632-5

THE SUPREME COURT OF

OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,
Respondent,

v.

JONATHON ANDREW BENSON,
Appellant/Petitioner.

ANSWER TO PETITION FOR REVIEW BY YAKIMA COUNTY

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A. **INTRODUCTION.**

Benson raised two primary issues on appeal; that the State had not provided the jury with sufficient evidence to support the conviction and, that the State's attorney had committed prosecutorial misconduct in his closing arguments.

This case was affirmed by the Court of Appeals, Division III in an unpublished opinion. The initial decision was filed on August 6, 2019. Benson filed a motion for reconsideration which solely addressed the issue of one legal financial obligation, the original opinion was amended to indicate the $200.00 filing fee was to be struck.

The court opined the evidence presented by the State was sufficient to support the jury's determination Benson had committed the underlying charge of Indecent Liberties by forcible compulsion. (Slip pages 8-9)

The Court of Appeals noted Benson did not object to the alleged misconduct on the part of the State in closing. It determined Benson's allegation that the State had committed prosecutorial misconduct, "…was a single statement, and in context cannot reasonably be construed as flagrant or ill-intentioned. It could easily have been addressed by an admonition to the jury."

The Court of Appeals ruled there was no basis to reverse the underlying conviction.

ISSUES PRESENTED BY PETITION

1. This Court should grant review because the Court of Appeals opinion as that opinion is in conflict with other decisions of the Court of Appeals. The Court of Appeals decision is in conflict with previous decisions of this court and/or the Court of Appeals. Review should be granted because question raised in one of constitutional magnitude:
   a. The State did not present insufficient evidence.
   b. The State committed misconduct when it vouched for the testimony of the victim.

ANSWER TO ISSUES PRESENTED BY PETITION

1. The Court of Appeals opinion does not merit review. Benson has not met the standards set forth in the Rules of Appellate Procedure, 13.4, which determine whether a matter is should be reviewed.
   a. The Court of Appeals correctly determined that there was sufficient evidence presented.
   b. The opinion in this case does not conflict with other opinion of this court or any division of the Court of Appeals.
   c. The opinion of the Court of Appeals does not address a significant question of law under either the State or Federal Constitutions.
   The Court of Appeals opinion does not merit review under any circumstance and specifically not under RAP 13.4

B. STATEMENT OF THE CASE

Ms. Jessica Arellano, a special education student who had played soccer in the Special Olympics, was on the campus of the Yakima Valley Community College (YVCC) charging her cell phone at a location where she had charged her phone before. RP 126, 116, 128, 188. 205. Ms. Arellano was not a student of YVCC at the time of this incident. RP 205

She was by herself when she was approached by the defendant.

There was initially conversation between them, some of that regarding whether Ms. Arellano wanted to drink some of the lemon vodka the Appellant had and was drinking. RP 113, 119, 131-32, 140

Ms. Arellano eventually went outside to get some air and at some point in time the defendant also went outside, Ms. Arellano joined him. RP 113. At this time the defendant gave her a "friendly hug." Benson next kissed Ms. Arellano on the neck which she voiced her objection to saying "…like why are you kissing me." She testified that it was not okay that he had kissed her. After Benson kissed her Ms. Arellano went back into check on her phone. RP 113-15. She testified "I hadn't said anything because I got scared inside my body…" RP 115.

Ms. Arellano said that Benson called her over to an area near a tree then "he like grabbed me. And I felt his dick on me. And then he turned and gave me a big old hug and I tried to -- and I tried to move it away…so I tried to push him back away…because I, I don't feel comfortable with that." RP 116. When asked about the big hug she testified that she was not comfortable with it and that she once again stated that she did not say anything because she "…just got too scared." She then testified that what she felt was "[l]ike a dick, like his hard dick...he got like a bone and like when he got drunk, you know how guys get drunk and you know how they've got like a burner? Like they want to have sex…. he was moving it

back and forth…[a]nd he was still hugging me…I was pushing him away and walking back away." When asked how effective that was she stated "[n]ot good." And when asked if it was easy to push the defendant away she stated, "No." RP 118-19, 121. She testified about getting away from the defendant after this as "escaping." RP 120.

Ms. Arellano was able to identify the person who had rubbed his boner on her as being the defendant. RP 121-2, 124. During later examination she also testified the defendant was grabbing and touching her butt when they were out near the tree, this occurred separately from the incident where he hugged her, kissed her and rubbed his boner on her. During this incident Ms. Arellano was also pushing Benson away because she did not feel comfortable with what he was doing. She stated she was not very successful at pushing him off, that she was scared and she didn't know if he had a knife or a gun. RP 125-26, 134-35

Benson was a complete stranger to Ms. Arellano. She reiterated that she had been in special education and had been successful with her soccer team that was in the Special Olympics. RP 126. Ms. Arellano was wearing a tank top and basketball shorts on the day of this crime. RP 130

On cross-examination Ms. Arellano reiterated that the defendant had rubbed his dick on her and that while she may not have used the phrase "dry humping" she understood that it meant rubbing your boner up

and down. RP 135. She stated that during this contact Benson had been wearing shorts over his pants and that he had taken those shorts off. RP 135-6.

She further clarified that when the defendant was rubbing his boner on her he was rubbing her "on the girl's uppers…[t]he pussy." That to do this he had been bending down at the knees. RP 137. Defendant's counsel attempted to get Ms. Arellano to stated that she had been coached to use this phrasing, but she stated that was using her own words. RP 138.

YVCC Security Officer Olson confirmed that when he spoke to Ms. Arellano that she stated that she was pressed up against the door in an alcove and that her butt was grabbed. RP 159. He further testified that Ms. Arellano stated to him that the defendant has "rubbed himself on her." RP 161.

YVCC Security Officer Cornwell testified that he was notified that there was somebody in the nearby park, which is contiguous to campus, who had alcohol. Officer Cornwell began observation of this person, later identified as the defendant. This officer also observed the victim on campus charging her phone and intended to notify her that she could not do that activity. RP 188-89. As he was going to contact these individuals, he approached a small alcove and observed that the two individuals were in very close contact with the defendant's hands on the

victim's posterior. He further testified:

> A Chest to chest, face past ears, hands on the posterior, a look of surprise on the female with her hands to her sides.
> Q Okay. So, she wasn't hugging him?
> A Negative.
> Q And what was the expression on her face?
> A Surprise. RP 189

During cross-examination defendant's counsel asked Officer Cornwell if he noticed the victim's demeanor, this officer's initial response was "[t]he anxiety she felt when she came into the Deccio Building." He also testified that he observed the defendant "snuggling, nuzzling in the neck area." Trial counsel stated that the defendant's hands would have been on the victim's hip area. RP 221-22

The State on redirect asked if the question/comment by trial counsel about the hip area and this officer corrected the previous statement/question and testified that "…I would say that he put his hands – his hands were on her buttocks, not her hips…[t]he male subjects had his hands on the female's posterior." PR 229

Officer Bradley Althauser was the arresting officer. He located the defendant and took him into custody after having been contacted by the YVCC staff. RP 242-5. The victim was brought to the location where this officer had the defendant and she, Ms. Arellano, identified the defendant. RP 247. The defendant was transported to the police station

and was placed in a holding cell. It was in that location that Officer Althauser questioned the defendant. RP 247-8. This interview was recorded by the officer using an automatic system called COBAN. RP 250.

During that interview Benson stated that the victim had been putting her arms around him. That he had given her a hug and that during that hug he had "felt a little bit…". This was later clarified by the officer to be the defendant felt the victim's butt, however, [he] wasn't trying to do anything." RP 254. Benson also admitted on this tape that he had kissed the victim on the neck.[1] And agreed with the officer when he asked if the victim had told Benson "no." Benson went on to state that he needed a hug. When asked "[d]id you hump the front of her leg – like dry hump her?" Benson stated "[m]aybe, I don't know…maybe…no…if I did I'm sorry. I apologize to her." RP 254-56.

ARGUMENT

This petition is governed by RAP 13.4(b), which sets forth the standard Benson must meet before this court will accept review. Benson claims that his petition meets the criterion of RAP 13.4(b) (1) and (2) and

[1] The tape recording of this portion has some sections that are "indiscernible" however it is clear what the answers given to the officer were from context. It must be noted that the recording was played to the jury and the VPR of this conversation was taken from the audio of that recording played in open court.

(3). There is no basis for review under any RAP.

The Court of Appeals opinion does not meet any of the criterion set forth in RAP 13.4(b). The opinion does not **1**) Conflict with any decision by this court or (2) any opinion by any division of the Court of Appeals and (3) while there is no doubt that Benson believes this is a significant question under the State and/or the federal Constitution that clearly is not the case herein.

These two allegations are controlled by clearly settled case law and the actions of the court did not implicate any of Benson's rights under either Constitution. No portion of the court's ruling conflicts with any cases cited by Benson.

Issue 1 - Insufficiency of the evidence – forcible compulsion.

Benson alleges the Court of Appeals decision regarding the sufficiency of the State's evidence is in conflict with previous case of this and the Court of Appeals, that is incorrect.

The court's opinion cited well settled case law when it addressed the allegation that the State had presented insufficient evidence to Benson had committed indecent liberties by forcible compulsion. The court cited to State v. Brown, 162 Wn.2d 422, 428, 173 P.3d 245 (2007); State v. Salinas, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992) and State v. Thomas, 150 Wn. 2d 821, 874-75, 83 P.3d 970 (2004), aff'd, 166 Wn.2d 380, 208

P.3d 1107 (2009) none of the analysis of Benson's case when analyzed using the well founded cases conflicts with any other case in this State.

The court cited State v. Ritola, 63 Wn. App. 252, 254, 817 P.2d 1390 (1991), the case Benson believed controlled his case and which he believed was determinative of his position. The court cited this case for its definition of "[f]orcible compulsion, being " ' physical force which overcomes resistance,' " requires more physical impact than the impact inherent in the sexual contact." The court then related the facts of this case to Ritola.

The court of Appels distinguished Benson's case from Ritola:

> Mr. Benson likens his case to that in Ritola, in which this court held that indecent liberties was not proved when the defendant reached out and squeezed the breast of a female juvenile detention counselor. But in that case there was no resistance—the counselor "had no time to resist." Id. at 255.
>
> In this case, Ms. Avon testified that she resisted by trying to push Mr. Benson away or pull away, but he continued to hug her. The evidence was sufficient for reasonable jurors to find that his continuing to hold her close constituted forcible compulsion. (Slip at 9)

From Ms. Jessica Arellano testimony:

Benson was a complete stranger to Ms. Arellano. She testified she had been in special education. RP 126. Benson's attorney elicited testimony while attempting to discredit the claim that Benson was "rubbing his dick on you" that Ms. Arellano was "like 5'4"" and that the

defendant was "…a lot taller than you." RP 137

Again, this victim was by herself when she was approached by Benson who was intoxicated, RP 113, 119, 131-32, 140, Benson gave her a "friendly hug", Benson next kissed Ms. Arellano on the neck which she voiced her objection to saying "…like why are you kissing me." she testified it was not okay that he had kissed her, she testified "I hadn't said anything because I got scared inside my body…" RP 115.

Later Benson called her over to an area near a tree then "he like grabbed me. And I felt his dick on me. And then he turned and gave me a big old hug and I tried to -- and I tried to move it away…so I tried to push him back away…because I, I don't feel comfortable with that." RP 116. She testified she was not comfortable with it and that she again stated she did not say anything because she "…just got too scared." She testified she felt "[l]ike a dick, like his hard dick...he got like a bone and like when he got drunk, you know how guys get drunk and you know how they've got like a burner? Like they want to have sex…. he was moving it back and forth…[a]nd he was still hugging me…I was pushing him away and walking back away." When asked if that worked she stated "[n]ot good." And when asked if it was easy to push the defendant away she stated, "No." RP 118-19, 121. She testified about getting away from the defendant after this as "escaping." RP 120.

In additional testimony the victim testified the defendant was grabbing and touching her butt, during this incident Ms. Arellano was also pushing Benson away because she did not feel comfortable with what he was doing. She stated she was not very successful at pushing him off, that she was scared and she didn't know if he had a knife or a gun. RP 125-26, 134-35 Benson did not testify at trial standing on his right to remain silent.

Issues of witness credibility are to be determined by the trier of fact and cannot be reconsidered by an appellate court. State v. Camarillo, 115 Wn.2d 60, 71, 794 P.2d 850 (1990). A reviewing court will consider the evidence in a light most favorable to the prosecution. Id. It also must defer to the finder of fact in resolving conflicting evidence and credibility determinations. Camarillo, 115 Wn.2d at 71. A challenge to the sufficiency of the evidence requires that the defendant address the evidence and all reasonable inferences drawn in favor of the State, with circumstantial evidence and direct evidence considered equally reliable. State v. Salinas, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992). The elements of a crime can be established by both direct and circumstantial evidence. State v. Brooks, 45 Wn. App. 824, 826, 727 P.2d 988 (1986). One is no less valuable than the other. There is sufficient evidence to support the conviction if a rational trier of fact could find each element of

the crime proven beyond a reasonable doubt.

Clearly the testimony regarding Benson's acts were such that they met the State's burden of proof beyond a reasonable doubt. his conduct was criminal and that those acts were done with forcible compulsion as defined by the law given to Benson's jury.

Benson states in his motion for review that the force he used while rubbing his "boner" on this five foot tall woman was that needed for him to accomplish an act of sex.

This was unwanted sexual attack, in public, by a stranger, on a 5 foot tall woman, who was pushing him away. Benson also states "[t] The only physical contact during this incident by Mr. Benson was the placing of his hands on J.A.'s buttocks." (Petition at 12) and then almost immediately states the "…act of putting his penis against J.A.'s body was done with only the level of force needed to accomplish this sexual contact." Apparently rubbing his penis on a stranger in public does not amount to "physical contact" to Benson, it clearly was contact according to the testimony of this victim.

There is nothing in the opinion issued in this case conflicts with any of the law cited in Benson's brief, his petition for review, the previous opinions issued by this court or the Court of Appeals. There is no basis for this court to accept review of this issue or this case, there is no basis

pursuant to RAP 13.4 for review to be granted.

Issue two – Alleged Prosecutorial misconduct.

Benson alleges the State's attorney vouched for and put the weight of the State behind the testimony of the victim and because, as Benson alleges, there was no other testimony regarding Benson's criminal acts this unlawfully tainted the outcome of his trial.

In a prosecutorial misconduct claim, the defendant bears the burden of proving that the prosecutor's conduct was both improper and prejudicial. State v. Thorgerson, 172 Wn.2d 438, 442, 258 P.3d 43 (2011).

This court in State v. Emery, 174 Wn.2d 741, 759, 760-1, 278 P.3d 653 (2012) set out a treatise regarding prosecutorial misconduct. In Emery this court stated:

> Under our established standard of review, Emery and Olson must first show that the prosecutor's statements are improper….
>
> Once a defendant establishes that a prosecutor's statements are improper, we determine whether the defendant was prejudiced under one of two standards of review. If the defendant objected at trial, the defendant must show that the prosecutor's misconduct resulted in prejudice that had a substantial likelihood of affecting the jury's verdict. If the defendant did not object at trial, the defendant is deemed to have waived any error, unless the prosecutor's misconduct was so flagrant and ill intentioned that an instruction could not have cured the resulting prejudice. Under this heightened standard, the defendant must show that (1) " no curative instruction would have obviated any prejudicial effect on the jury" and (2) the misconduct resulted in prejudice that " had a substantial

> likelihood of affecting the jury verdict." (Citations omitted.)

Benson did not object in the trail court to the allege misconduct. He alleges that this taint was so significant that even if he had objected there was no way to cure the error with this jury. Therefore, his conviction should be set aside.

There is nothing in the record other than the testimony of the State's witnesses. The testimony of all of those witnesses was consistent. The testimony of the victim a person who was as all parties agree a person who presented to the public in a way that was not typical. The State's comments were clearly done in order to address this fact. The State was addressing this jury and addressing head-on that a person who from the record was small of stature, presented in an atypical manner and spoke in an unusual manner would sit in front of twelve people and tell them about how a person had sexually assaulted them. The States purpose was to address that often a person who had these characteristics is looked down upon or are judge differently by society was brave to put herself out there and speak frankly about the crime that had been committed against her.

The State's attorney was not attempting to vouch for the victim, she did an amazing job of testifying on her behalf, he was attempting to address a common bias in society when it comes to people like J.A.

If at the time Mr. Dold, a very experienced trial attorney, believed these statements were vouching or putting the weight of the State behind the words of the victim or any other manner or means of misconduct on the part of the State he would have objected. He did not.

This is not as couched by Benson a "she said, he said" case. This is a case where security and police officers where involved and independently observed at least one of the acts for which Benson was charged. Benson stated in his briefing that in his admission, confession, to the police he stated he may have done something but he did not remember but if he did he was sorry. This is not some denial that would in effect make the words of J.A. the sole basis for a conviction.

The law is clear, if a defendant does not object the standard changes and it is the defendant's duty on appeal to meet that standard.

Again, Benson, alleging prosecutorial misconduct bears the burden of first establishing "the prosecutor's improper conduct and, second, its prejudicial effect." State v. Dhaliwal, 150 Wn.2d 559, 578, 79 P.3d 432 (2003). This court will evaluate a prosecutor's challenged statements "within the context of the prosecutor's entire argument, the issues in the case, the evidence discussed in the argument, and the jury instructions." State v. Dhaliwal, 150 Wn.2d 559, 578, 79 P.3d 432 (2003). Courts review allegations of prosecutorial misconduct during closing argument in

light of the entire argument, the issues in the case, the evidence discussed during the argument, and the court's instructions. State v. Sakellis, 164 Wn. App. 170, 185, 269 P.3d 1029 (2011).

Improper vouching occurs if the prosecutor (1) places the prestige of the government behind the witness, or (2) indicates that evidence not presented at trial supports the witness's testimony. State v. Robinson, 189 Wn. App. 877, 892-93, 359 P.3d 874 (2015). However, there is a difference between the prosecutor's personal opinion, as an independent fact, and an opinion based upon or deduced from the evidence. State v. McKenzie, 157 Wn.2d 44, 53, 134 P.3d 221 (2006). Misconduct occurs only when it is clear and unmistakable that the prosecutor is not arguing an inference from the evidence, but is expressing a personal opinion. *Id.* at 54.

The State spent time addressing the fact that the victim spoke and presented in a manner that was atypical.

The State began its closing argument stating:

> So, this is an interesting case because basically we have a witness, Jessica Arellano, and, you know, she's a little different than the rest of us and you can tell that when you hear her talk, you can tell that, kind of, by looking at her. And we know that she graduated from high school, that she was in special education, she's been in the Special Olympics. And so, she has a little different style of communication.
>
> …So, ladies and gentlemen, when a person is

> talking to you and you feel like they're talking funny. You know, they're talking differently than you would. On a sub –- you know, on a subconscious basis, there's a part of you that kind of says I don't know about this information, it's coming from this kind of weird place to me. Okay?

The court in State v. McKenzie addressed the absence of an objection by defense counsel stating it "strongly suggests to a court that the argument or event in question did not appear critically prejudicial to an appellant in the context of the trial." State v. McKenzie, 157 Wn.2d 44, 53 n.2, 134 P.3d 221 (2006) (citations omitted).

The evidence in this case was substantial. Benson opines that this short unrepeated statement was such that there was nothing that could have been done to correct it. As the Court of Appeals opinion states "[b]ut it was a single statement, and in context cannot reasonably be construed as flagrant or ill-intentioned. It could easily have been addressed by an admonition to the jury." (Slip at 11-12)

All Benson's trial attorney would have had to have done was object and move to strike the statement, he did not. State v. York, 50 Wn. App. 446, 451, 749 P.2d 683 (1987) "The jury is presumed to follow the court's instructions. State v. Grisby, 97 Wn.2d 493, 499, 647 P.2d 6 (1982), cert. denied, 459 U.S. 1211 (1983)." This simple method would have legally remove the alleged offensive statement from consideration by

the jury. The Appellant waived the right to assert prosecutorial misconduct unless the misconduct was so "flagrant and ill intentioned" that it caused enduring and resulting prejudice that a curative instruction could not have remedied. State v. Russell, 125 Wn.2d 24, 86, 882 P.2d 747 (1994), cert. denied, 514 U.S. 1129 (1995). This simple statement made by the State to address the unique nature of this victim of this witness was most certainly not flagrant and ill-intentioned.

Lastly, Benson states the actions of the Court of Appeals were such that they affect his right under the due process clause and his right to a fair trial. He argues this based on his right to be convicted only upon proof beyond a reasonable doubt. He claims this opinion impacts his right to a fair trial and therefore, is a critical questions involving the State or Federal Constitution, citing U.S. Const., amends. VI, XIV; WA Const. Art. 1, § 22 (Apps Motion pages 8, 11-12)

Benson makes two generalized statements supporting his assertion that this court should review his claims under RAP 13.4(3). It would not be a stretch to state that all defendants believe an opinion denying their appeal is a significant question under one or both of Constitutions, however, that is not the standard for acceptance of review by this court.

The first allegation under this subsection is the State did not prove its case with sufficient evidence and therefore the opinion was wrongfully

decided allowing a conviction on less than sufficient evidence. This violated Benson's right to due process and his conviction was then based on proof which could not have been beyond a reasonable doubt.

As addressed above this is not supported by the law and the facts which were presented to this jury. Those facts as set forth above were significant and unrefuted by the defendant. They were more than sufficient for the jury, after having been properly charged with the law by the trial court, for this of Benson's peers to find him guilty as charged.

Secondly, he alleges the statement by the State's attorney was such that his rights under both Constitutions were abridged. That there was no method for him to have a fair trial. Once, again this is refuted above. The statement was not misconduct, it was not objected to and it clearly was not such that if his counsel so believed it to be objectionable he could have lodged an objection and if the court so ruled the statement could have been struck from the record.

While the rejection of Benson's arguments and the affirmation of his conviction is a substantial matter to him the ruling by the Court of Appeals does not merit review under RAP 1.3(4)(b)(3).

D. CONCLUSION

The Court of Appeals cited well settled case law in its opinion and distinguished the primary case upon which Benson based his direct appeal.

The State presented evidence which was more than sufficient to support the charge of indecent liberties by forcible compulsion. Cases cited by Benson are inapplicable or distinguishable.

The same is true regarding the alleged misconduct by the State. Courts of review are tasked to discern whether the unique facts of each case when applied to the case law merit review. The Court of Appeals applied well settled law to the facts of this case and determined that there was no basis to overturn Benson's convictions.

That opinion did not conflict with any opinion issued by this court or the Court of Appeals. Conflict in this area of the law does not mean when applying a standard to the unique facts the court came to a conclusion which different than the opinion of another court.

Benson has not met his burden under RAP 13.4 therefore this court should deny review.

Respectfully submitted this 4th day of October 2019,

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DECLARATION OF SERVICE

I, David B. Trefry, state that on October 4, 2019, I emailed a copy of the State's Answer to: Jill Reuter at jill@ewalaw.com

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 4th day of October, 2019 at Spokane, Washington.

s/ David B. Trefry
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YAKIMA COUNTY PROSECUTORS OFFICE

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