

No. 48629-6-II

COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent,

v.

MCKENNA STEIN, Appellant.

Appeal from the Superior Court of Kitsap County
The Honorable Sally F. Olsen
No. 15-1-01301-5

BRIEF OF APPELLANT
MCKENNA STEIN

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I. ASSIGNMENTS OF ERROR

1. The trial court erred by finding that Ms. Stein was not unlawfully detained when the officer continued to question her outside of the residence.
2. The trial court erred by finding that the officer's contact with Ms. Stein, outside the residence, was a valid *Terry* stop.
3. The trial court erred by finding that the officer's observation of drug paraphernalia in Mr. Yarber's residence gave the officer reasonable suspicion to believe that Ms. Stein was engaged in criminal activity.
4. The trial court erred by finding that *State v. Soto-Garcia* is not on point, because the officer was conducting a valid *Terry* stop.
5. The trial court erred by finding that Ms. Stein voluntarily admitted to the use and consumption of a controlled substance.
6. The trial court erred by finding that the search of Ms. Stein's vehicle was lawful, pursuant to her voluntary consent.

II. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. Would a reasonable person who had just been detained at gunpoint while their boyfriend was arrested in his home feel free to leave when an officer continued to question them outside the residence about drug paraphernalia in the house and then asked for consent to search their car?
2. When an officer observes a glass pipe and tin foil in a residence where at least two people live, does the officer have reasonable suspicion to believe that a guest in that residence is involved in criminal activity?
3. When a person who is unlawfully seized without reasonable suspicion of criminal activity consents to a search of their car, without being advised of their Miranda warnings or their right to refuse consent, is that consent invalid because it is the result of the exploitation of the unlawful seizure?

III. STATEMENT OF THE CASE

1. Procedural History.

Ms. Stein was charged with one count of unlawful possession of a controlled substance – methamphetamine. (CP 1-5). She filed a motion to suppress, arguing that she was unlawfully seized. (CP 7-11).

On February 16, 2016, the court heard, and denied, the motion to suppress. (RP 2-16-16 p. 3, 36-38, CP 46-50).

On February 22, 2016, the parties stipulated to the facts for purposes of trial. (RP 2-22-16 p. 2, CP 25-30). Ms. Stein was found guilty. (RP 2-22-16 p. 2, CP 25-30).

2. Motion to Suppress.

Ian Yarber had a felony DOC warrant. (RP 6). An officer located a vehicle associated with Mr Yarber, near a residence associated with Mr. Yarber. (RP 2-16-16 p. 60). Officer Heffernan was on patrol and received a call to respond to the location. (RP 2-16-16 p. 6).

Officers Heffernan, Griesheimer, Faidley, and Hughes responded at approximately 5:00 a.m. (RP 2-16-16 p. 6-7). They observed the vehicle, and then went to the residence where Mr. Yarber had been living. (RP 2-16-16 p. 6-7). The officers knocked on the door, with no response. (RP 2-16-16 p. 8). Then, the officer called the homeowner, who arrived after forty-five minutes. (RP 2-16-16 p. 8). When the homeowner arrived, she told the officers that Mr. Yarber lived in the house, and she let the officers into the house. (RP 2-16-16 p. 9, 25).

Three officers entered the house with guns drawn. (RP 2-16-16 p. 9-10, 18-19). Mr. Yarber was immediately detained, taken into custody, and removed from the house. (RP 2-16-16 p. 10).

Mr. Yarber's girlfriend, McKenna Stein, was in the kitchen when Mr. Yarber was being detained. (RP 2-16-16 p. 10). She did not live at the house. (RP 2-16-16 p. 25). The officers told Ms. Stein to wait in the kitchen while they detained Mr. Yarber. (RP 2-16-16 p. 11). Ms. Stein followed their instructions. (RP 2-16-16 p. 11). After Mr. Yarber was detained and taken outside, Ms. Stein went outside. (RP 2-16-16 p. 11). Officer Heffernan could not remember if he asked her to come outside or if she went outside on her own. (RP 2-16-16 p. 11).

Once they were outside, the officer asked to speak to Ms. Stein about what he'd seen in the house: a meth pipe and some foil. (RP 2-16-16 p. 11-12). At that time, Ms. Stein was not in handcuffs and the officer no longer had his firearm drawn. (RP 2-16-16 p. 11). When Ms. Stein was outside with the officer, it was still dark out. (RP 2-16-16 p. 16-17). After being asked to speak to the officer, Ms. Stein agreed. (RP 2-16-16 p. 12).

The officer explained to Ms. Stein that they were there for Mr. Yarber and told her that she wasn't going to jail. (RP 2-16-16 p. 12, 26). She apologized for taking so long to answer the door. (RP 2-16-16 p. 12). Then, the officer asked her about the meth pipe and foil he'd seen in the house. (RP 2-16-16 p. 12). The officer did not testify regarding the content of that conversation, except to say that during their conversation, Ms. Stein stated she had a heroin problem. (RP 2-16-16 p. 13). The

officer asked Ms. Stein if there was anything in her vehicle. (RP 2-16-16 p. 13). The officer did not testify regarding her answer. (RP 2-16-16 p. 13). The officer asked for permission to search her vehicle. (RP 2-16-16 p. 13). The officer could not remember what he said when he asked to search the car. (RP 2-16-16 p. 23-24). The officer indicated that Ms. Stein agreed, but could not recall what she said. (RP 2-16-16 p. 24).

Ms. Stein was never advised of her *Ferrier* warnings or her *Miranda* warnings. (RP 2-16-16 p. 22, 24).

While searching the car, the officer asked her if she had a “kit” for her drugs and where it was located. (RP 2-16-16 p. 13). Ms. Stein told him it was in her purse and retrieved her purse from the vehicle; it appeared to contain paraphernalia. (RP 2-16-16 p. 13-14). The officer also entered the vehicle and took a backpack that Ms. Stein said belonged to Mr. Yarber. (RP 2-16-16 p. 14). Officer Heffernan spoke to Ms. Stein for ten to fifteen minutes. (RP 2-16-16 p. 23).

As a result of the above, Ms. Stein was charged with, and convicted of, unlawful possession of a controlled substance – methamphetamine, based on methamphetamine found in Ms. Stein’s purse. (CP 1-5, 25-30).

The trial court found that Ms. Stein was seized when the officers entered with guns drawn, but that it turned into a lawful *Terry* stop after

Mr. Yarber was detained because the officer observed drug paraphernalia in the home. (RP 2-16-16 p. 36). The court found that Ms. Stein voluntarily consented to a search of her vehicle. (RP 2-16-16 p. 37-38).

I. ARGUMENT

1. Ms. Stein Was Unlawfully Seized.

A warrantless search or seizure is per se unreasonable under Article I, Section 7 of the Washington Constitution and the Fourth Amendment to the United States Constitution. U.S. Const. amend. IV; Wash. Const. Art. I, section 7; *State v. Rankin*, 151 Wn.2d 689, 695, 92 P.3d 202 (2004); *State v. White*, 135 Wn.2d 761, 958 P.2d 982 (1998); *State v. Hendrickson*, 129 Wn.2d 61, 917 P.2d 563 (1996). When conducting a search or seizure, law enforcement officers are generally required to secure a warrant issued upon a showing of probable cause. Exceptions to this requirement are limited and narrowly drawn. *White*, 135 Wn.2d at 768-69; *Hendrickson*, 129 Wn.2d at 71. The State bears a heavy burden in showing that the search or seizure falls within one of the exceptions to the warrant requirement. *State v. Johnson*, 128 Wn.2d 431, 909 P.2d 293 (1996).

A person is seized when an officer's physical force or show of authority would cause a reasonable person to not feel free to leave, refuse to answer, or otherwise go about his business. See *State v. Aranguren*, 42 Wn. App. 455, 711 P.2d 1096 (1985); *State v. Rankin*, 151 Wn.2d at 695;

State v. Kinzy, 141 Wn.2d 373, 388, 5 P.3d 668 (2000). The relevant question is whether a reasonable person in the individual's position would feel he or she was being detained. *State v. O'Neill*, 148 Wash.2d 564, 581, 62 P.3d 489 (2003).

When reviewing the denial of a suppression motion, an appellate court determines whether substantial evidence supports the trial court's findings of fact and whether the findings support the conclusions of law. *Garvin*, 166 Wash.2d 242, 249, 207 P.3d 1266 (2009). However, the appellate court reviews the trial court's conclusions of law following a suppression hearing de novo. *State v. Williams*, 148 Wash.App. 678, 683, 201 P.3d 371 (2009).

a. *Ms. Stein Was Originally Seized When Officers Entered the Residence, With Guns Drawn, and Told Her to Stay in the Kitchen, While Arresting Mr. Yarber on a DOC Warrant.*

“Under both federal and Washington State law a felony arrest warrant gives the police the authority to enter the house of the accused for a brief period of time.” *State v. Hatchie*, 161 Wash. 2d 390, 395, 166 P.3d 698, 702 (2007); *see also* U.S. CONST. amend. IV, XIV, WASH. CONST. art. I § 7. However, “[a]ny person not subject to either an arrest warrant or DOC supervision, residing with a person under DOC supervision, is entitled to the full expectation of privacy under our constitution and the Fourth Amendment in his [or her] home” *State v. McKague*, 143

Wash. App. 531, 546, 178 P.3d 1035, 1041-42 (2008).

In this case, the trial court correctly found that Ms. Stein was seized when three officers entered the residence, with firearms drawn, and told her to stay in the kitchen while they arrested Mr. Yarber. While the initial seizure may have been lawful pursuant to the officer's serving a DOC warrant on Mr. Yarber and due to officer safety concerns, the officers had no reason to continue to detain Ms. Stein after Mr. Yarber was detained.

b. *Ms. Stein Was Unlawfully Detained When Officers Continued to Question Her, After Mr. Yarber Had Been Arrested.*

An investigatory seizure may be made on less than probable cause. *Terry v. Ohio*, 392 U.S. 1, 88 S. Ct. 1868, 20 L. Ed. 2d 889 (1968); *State v. Thompson*, 93 Wn.2d 838, 840, 613 P.2d 525 (1980). An officer making such an investigatory stop, however, is required by the Fourth Amendment to have a reasonable suspicion, based on objective facts, that the individual is involved in criminal conduct or is a safety threat. *Id.* at 840-41; *State v. Madrigal*, 65 Wn.App. 279, 827 P.2d 1105 (1992). "An investigative detention constitutes a seizure, and must therefore 'be reasonable under the Fourth Amendment.'" *State v. Armenta*, 134 Wn.2d 1, 10, 948 P.2d 1280 (1997) (internal citation omitted). The State bears the burden to prove that the stop was reasonable. *State v. Johnston*, 38

Wn. App. 793, 798-9, 690 P.2d 591 (1984), citing *Florida v. Royer*, 460 U.S. 491, 500, 75 L. Ed. 2d 229, 103 S. Ct. 1319 (1983).

- i. *There was no reasonable suspicion that Ms. Stein was engaged in criminal activity.*

The officer did not have reasonable suspicion to believe that Ms. Stein was engaged in criminal activity or a safety threat. The trial court found that the officer had reasonable suspicion to believe that Ms. Stein was involved in criminal activity based on the drug paraphernalia seen in the residence.

“[A]lthough use of drug paraphernalia to ingest a controlled substance is a crime, mere possession of drug paraphernalia is not a crime.” *See State v. Rose*, 175 Wash. 2d 10, 19, 282 P.3d 1087, 1091-92 (2012); *State v. O'Neill*, 148 Wash.2d 564, 584 n. 8, 62 P.3d 489 (2003); RCW 69.50.412(1).

In this case, Mr. Yarber and the owner of the residence lived at the residence; Ms. Stein did not. Mr. Yarber had just been arrested inside the residence where the paraphernalia was seen. And, when questioned about the paraphernalia, Ms. Stein denied that it was hers. At that point, the officer had no reason to believe that Ms. Stein was engaged in criminal activity or to continue to question her. Furthermore, the officer had no reason to believe that Ms. Stein had *used* the paraphernalia. And, the fact

that paraphernalia was in Mr. Yarber's residence did not give the officer reasonable suspicion to believe that evidence of a crime may be found in Ms. Stein's vehicle. At most, the officer's continued questioning of Ms. Stein was a fishing expedition. The officer did not have reasonable suspicion that Ms. Stein was involved in criminal activity; thus, the officer's questioning was not a valid *Terry* stop.

ii. *Ms. Stein was seized when the officer continued to question her outside the residence.*

The trial court correctly found that the officer's conversation with Ms. Stein outside the residence was not a social contact, but was an investigative detention, and thus a seizure¹. (CP 49 at Concl. of Law V., VI.).

A request for a person to wait constitutes a seizure. In *Ellwood*, the court held that a seizure occurred where an officer requested the names and dates of birth of two subjects and told them to "wait right here" while he went to his patrol car to conduct a warrant check. *State v. Ellwood*, 52 Wn. App. 70, 72, 757 P.2d 547 (1988). In *Barnes*, the Court held that even a request to wait, such as "would you be willing to stick around" or "would you mind," while the officer runs a warrant check is a seizure. *State v. Barnes*, 96 Wn. App. 217, 219, 978 P.2d 1131 (1999).

¹ However, the trial court found that the detention was a lawful *Terry* stop.

Also, an officer's continued questioning and request to search, can constitute a seizure when the progressive intrusion would make a reasonable person feel that they were not free to leave or refuse to comply with the officer's requests. In *Soto-Garcia*, the defendant was stopped, walking at night, in an area known for narcotics activity, after he looked away from an officer. *Soto-Garcia*, 68 Wash. App. at 22. The defendant was asked where he was coming from and going to and he answered appropriately. *Id.* The defendant was asked his name; he voluntarily gave the officer his identification and the officer ran a records check without the defendant's consent. *Id.* The officer then asked the defendant if he had any drugs on him; he answered that he did not. *Id.* The officer then asked for consent to search the defendant and he agreed. *Id.* As a result of the search, the officer found cocaine. *Id.*

This Court held that Mr. Soto-Garcia was unlawfully seized when the officer asked him if he had cocaine on him and asked him for consent to search. *Id.*

Considering all of the circumstances surrounding the encounter between Tate and Soto-Garcia, the evidence was sufficient for the trial court to conclude that a reasonable person would not have felt free to decline the police officer's requests that he provide information regarding his activities and submit to a search. The atmosphere created by Tate's progressive intrusion into Soto-Garcia's privacy was of such a nature that a reasonable person would not believe that he or she was free to end the encounter.

Id.

In this case, the officer did not recall if he asked Ms. Stein to come outside with him or not. If he asked her to go outside, that is analogous to the cases where an officer asks a person to wait, and would constitute a seizure.

In addition, the police had just entered the residence where Ms. Stein was staying with guns drawn and ordered her to stay in the kitchen while the arrested her boyfriend. Although the officer told Ms. Stein that she was not under arrest and would not be arrested, the officer continued to question Ms. Stein. The officer asked Ms. Stein about the drug paraphernalia in the house, which she denied was hers. The officer continued to talk to Ms. Stein, and at some point she said she used heroin. The officer then asked for consent to search Mr. Stein's car. She was never read her *Miranda* warnings or advised that she was not required to consent to the search. The officer spoke to Ms. Stein for ten to fifteen minutes, despite the fact that she had committed no crime and there was no basis to question her.

Furthermore, the officer could not recall, or did not testify regarding, exactly what he said to Ms. Stein. In addition, the officer did not recall or testify to exactly how Ms. Stein responded. Because the

exact questioning and answers are relevant to the reasonableness of the seizure, the State cannot meet its burden to prove that the seizure was reasonable in this case.

This case is very similar to *Soto-Garcia*. In both cases, the officer had no reasonable suspicion or probable cause to believe the defendant was involved in criminal activity. Nonetheless, the officers in both cases questioned the defendants. In both cases, the defendants were cooperative and answered the officer's questions. In both cases, the officers questioned the defendants about drugs and requested their consent to search. In this case, unlike in *Soto-Garcia*, Ms. Stein had also, immediately preceding this questioning, been seized, at gun point, by the same officer. And, in both cases, the defendants were not advised of their *Miranda* warnings or told that they did not have to consent to the search.

Given the circumstances of this case, a reasonable person would not have felt free to refuse to answer the officer's questions or refuse to consent to a search. Therefore, "[t]he atmosphere created by [the officer's] progressive intrusion into [Ms. Stein's] privacy was of such a nature that a reasonable person would not believe that he or she was free to end the encounter." *Soto-Garcia*, 68 Wash. App. at 25.

2. The Search of Ms. Stein's Vehicle Was Unlawful.

a. *Ms. Stein's Did Not Voluntarily Consent to a Search of Her Car.*

Ms. Stein's consent to search her vehicle was not voluntary.

"Factors which may be considered in determining whether one has voluntarily consented include whether *Miranda* warnings (*Miranda v. Arizona*, 384 U.S. 436, 86 S.Ct. 1602, 16 L.Ed.2d 694 (1966)) were given, the degree of education and intelligence of the individual, and whether he or she had been advised of the right to consent." *State v. O'Neill*, 148 Wash. 2d 564, 588, 62 P.3d 489, 502 (2003), citing *State v. Bustamante-Davila*, 138 Wash.2d 964, 981-82, 983 P.2d 590 (1999).

In this case, Ms. Stein had just been detained at gunpoint by the police while her boyfriend was arrested. Shortly thereafter, she went outside and was questioned by the police for ten to fifteen minutes regarding drug paraphernalia in the house, her drug use, and whether there were items related to drug use in her car. She was never advised of her *Miranda* warnings or her right to refuse consent to search. Furthermore, the officer testified that he did not remember if he asked Ms. Stein to come outside with him or if she went outside on her own, the officer did not remember what he said to Ms. Stein when he asked for consent to search, and he did not remember her response. Therefore, there was

insufficient evidence for the trial court to determine that Ms. Stein's consent was voluntary. Based on the facts of this case, Ms. Stein's consent was not voluntary and the results of the search should have been suppressed.

b. *Ms. Stein's Consent to Search was Invalid Because It Was Obtained Through an Exploitation of Her Illegal Seizure.*

“A consent to search obtained through exploitation of a prior illegality may be invalid even if voluntarily given.” *State v. Soto-Garcia*, 68 Wash. App. 20, 27, 841 P.2d 1271, 1275 (1992) abrogated on other grounds by *State v. Thorn*, 129 Wash. 2d 347, 917 P.2d 108 (1996), citing *Taylor v. Alabama*, 457 U.S. 687, 690, 102 S.Ct. 2664, 2667, 73 L.Ed.2d 314 (1982); *Wong Sun v. United States*, 371 U.S. 471, 487–88, 9 L.Ed.2d 441, 83 S.Ct. 407 (1963); *State v. Byers*, 88 Wash.2d 1, 7–8, 559 P.2d 1334 (1977), overruled in part in *State v. Williams*, 102 Wash.2d 733, 689 P.2d 1065 (1984); *State v. Tijerina*, 61 Wash.App. 626, 630, 811 P.2d 241 (1991); *State v. Sistrunk*, 57 Wash.App. 210, 216, 787 P.2d 937 (1990); *State v. Gonzales*, 46 Wash.App. 388, 397–99, 731 P.2d 1101 (1986); *State v. Jensen*, 44 Wash.App. 485, 489–90, 723 P.2d 443 (1986).

“Several factors need to be considered in determining whether a consent to search is tainted by the prior illegality: (1) temporal proximity of the illegality and the subsequent consent, (2) the presence of significant

intervening circumstances, (3) the purpose and flagrancy of the official misconduct, and (4) the giving of Miranda warnings.” *Soto-Garcia*, 68 Wash. App. at 27.

In *Gonzales*, the defendant was unlawfully arrested for burglary charges during a traffic stop because the officer did not have probable cause at the time to believe that a burglary had been committed. *Gonzales*, 46 Wash.App. at 398. After the illegal arrest, the defendant voluntarily consented to a search of his home. *Id.* The court found that the consent was lawful because the police did not request that he consent, he volunteered, he was advised that he did not have to consent, and the misconduct was not flagrant. *Id.*

Similarly, in *Jensen*, a consent to search after an unlawful search was upheld because the defendant was advised of their Miranda warnings and right to refuse consent. *Jensen*, 44 Wash.App. at 490–91, 723 P.2d 443.

However, in *Soto-Garcia*, this Court held that the defendant’s consent to search following an unlawful seizure was invalid where the defendant consented to a search after being unlawfully seized and where he was never advised of his *Miranda* warnings or the right to refuse consent.

In this case, as discussed above, Ms. Stein was unlawfully seized.

During that unlawful seizure, she was questioned and asked to consent to a search of her vehicle. Therefore, the illegal seizure and the consent were simultaneous. There were no intervening circumstances between the unlawful seizure and the consent to search. The officer's initial contact with Ms. Stein was inside a residence that her boyfriend, Mr. Yarber, and someone else lived in. The officers did not observe any contraband in plain view in the vehicle and had no reason to suspect that Ms. Stein was engaged in criminal activity. Nonetheless, the officer continued to question her and requested consent to search her car. Ms. Stein was never advised of her *Miranda* warnings or her right to refuse or limit her consent to search the vehicle. Based on the circumstances in this case, Ms. Stein's consent was tainted by the unlawful seizure. Therefore, the items recovered from the search should have been suppressed.

3. This Court Should Not Impose Appellate Costs Because Ms. Stein is Indigent and Unable to Pay.

This Court has discretion on whether or not to impose appellate costs in a criminal case. *State v. Sinclair*, 192 Wash. App. 380, 389-90, 367 P.3d 612, 616 (2016); *see also* RAP 14.2², 14.1(c)³.

² "A commissioner or clerk of the appellate court will award costs to the party that substantially prevails on review, *unless the appellate court directs otherwise in its decision terminating review.*" RAP 14.2 (emphasis added).

³ "If the court determines costs in its opinion or order, a commissioner or clerk will award costs in accordance with that determination." RAP 14.1(c).

As a general matter, the imposition of costs against indigent defendants raises problems that are well documented in *Blazina*—e.g., “increased difficulty in reentering society, the doubtful recoupment of money by the government, and inequities in administration.” *Blazina*, 182 Wash.2d at 835, 344 P.3d 680. It is entirely appropriate for an appellate court to be mindful of these concerns. Carrying an obligation to pay [appellate costs] plus accumulated interest can be quite a millstone around the neck of an indigent offender.

Sinclair, 192 Wash. App. at 391-92, quoting *State v. Blazina*, 182 Wn.2d 827, 301 P.3d 492 344 P.3d 680, 686 (2015). Although *Blazina* is not binding for appellate costs, some of the same policy considerations apply. *Id.*

Under *Blazina*, a trial court must consider “important factors, such as incarceration and a defendant's other debts, including restitution, when determining a defendant's ability to pay.” *Blazina*, 182 Wn.2d at 838. In addition, if a person is considered indigent, “courts should seriously question that person's ability to pay” *Id.*

A trial court’s finding of indigency will be respected unless there is good cause not to do so. *Sinclair*, 192 Wash. App. at 393; *see also* RAP 15.

In this case, Ms. Stein was found indigent and counsel was appointed for her trial, as well as this appeal. (CP 44-45). In addition, the trial court waived all non-mandatory legal financial obligations (RP 2-22-

16 at 8, CP 37). Furthermore, Ms. Stein acknowledged she has substance abuse issues, which could interfere with her ability to work and pay legal financial obligations. (RP 2-22-16 at 5-6). Therefore, this Court should exercise its discretion and not award appellate costs in this matter, if Ms. Stein does not substantially prevail.

I. CONCLUSION

In conclusion, Ms. Stein was unlawfully seized and her consent to search was invalid because it was not voluntary and it was obtained through an exploitation of her unlawful seizure. Therefore, the conviction should be reversed and all evidence obtained from the unlawful search should be suppressed.

Dated this 25th day of July, 2016.

Respectfully Submitted,



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Attorney for Appellant, Gary Brown

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COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON

STATE OF WASHINGTON,)	
)	
Respondent,)	NO. 48629-6-II
vs.)	
)	CERTIFICATE OF SERVICE
MCKENNA STEIN,)	
)	
Appellant.)	
)	

The undersigned certifies that on this day correct copies of this appellant's brief were delivered electronically to the following:

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Suite 300, Tacoma, WA 98402.

Tina Robinson
Kitsap County Prosecutor's Office
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Port Orchard WA 98366
trrobins@co.kitsap.wa.us.

The undersigned certifies that on this day correct copies of this appellant's brief were delivered by U.S. mail to the following:

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This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington.


Signed July 25, 2016 at Tacoma, Washington.

CERTIFICATE OF SERVICE

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PIERCE COUNTY DEPARTMENT OF ASSIGNED COUNSEL

July 25, 2016 - 11:35 AM

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