

NO. 49179-6-II

IN THE COURT OF APPEALS
FOR THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON,
Respondent,

v.

JANET L. GLEASON,
Appellant.

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

The Honorable Richard L. Brosey, Judge

OPENING BRIEF OF APPELLANT

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A. ASSIGNMENT OF ERROR

1. The trial court violated the “real facts doctrine” when it denied the appellant’s request for sentencing pursuant to the Drug Offender Sentencing Alternative (DOSA) and imposed a consecutive sentence based upon a victim impact statement that contained a factual allegation neither admitted by the appellant nor proven by the State.

B. ISSUE PERTAINING TO ASSIGNMENT OF ERROR

1. Did the trial court violate the “real facts doctrine” when it based its sentencing decision on an unproven allegation made by the victim, who is also the elected prosecuting attorney for Lewis County, that the offense of residential burglary was committed in order to extract revenge for prosecuting the appellant’s son in juvenile court, a factual allegation neither admitted by the appellant nor proven by the State?

C. STATEMENT OF THE CASE

1. Change of plea in Cause No. 15-1-00537-21 and 15-1-00594-21:

The Lewis County Prosecutor’s Office charged appellant Janet Gleason with possession of methamphetamine with intent to deliver in cause no. 15-1-00537-21. Clerk’s Papers (CP) 47-49. She was charged with two

additional VUCSA counts in an amended information filed October 2, 2015. CP-53-56.

The State charged Gleason with residential burglary, trafficking in stolen property and second degree malicious mischief on October 29, 2015 in cause no. 15-1-00594-21. CP 117-19. The residence burglarized was the house of elected Lewis County Prosecutor Jonathan Meyer.¹ CP 121-23.

Gleason pleaded guilty to one count of possession of methamphetamine with intent to deliver in cause no. 15-1-00537-21, and pleaded guilty as charged in cause no. 15-1-00594-21, on March 30, 2016. Report of Proceedings² (RP) (March 30, 2016) at 3-8; CP 67-77, 128-139.

The change of plea statement in cause no. 15-1-00594-21 contained the following recommendations: 84 months for count 1, 84 months for count 2, 29 months for count 3, with Drug Offender Sentencing Alternative upon cooperation with the State for recovery of items taken during the burglary, otherwise the state would recommend "top of the range sentence," legal financial obligations, no contact with victim, and a substance abuse

¹ An affidavit by Jonathan Meyer was filed October 5, 2015 stating that he was restricted for access to the file and would not participate in the case as prosecuting attorney and would not discuss the cause with any deputy prosecuting attorney. CP 60-61.

² "RP" refers to the verbatim reports of the guilty plea hearing and guilty plea and sentencing hearing held on March 30, 2016, and June 15, 2016, respectively.

evaluation and any required treatment. CP 131. The following was attached to the change of plea form as Gleason's statement in both cases:

Addendum A

In Lewis County, with intent to commit a crime against persons or property, enter or remain unlawfully in the dwelling or residence of another.

In Lewis County knowingly trafficking stolen property.

In Lewis County, knowingly and maliciously cause physical damage to the property of another in an amount exceeding \$750.00.

Addendum B

On February 10, 2015, in Lewis County, either as principal or an accomplice, I entered the residence or dwelling at 2914 vista road, Centralia, with the intent to commit a crime. While in said residence or dwelling, I or my accomplice, stole personal property with the intent to deprive the owner of said personal property.

On or between February 10, 2015, and April 1, 2015, in Lewis County, I knowingly trafficked in stolen property by disposing of property I knew to be stolen.

On February 10, 2015, in Lewis County, either as a principal or an accomplice, I participated in the above listed burglary where the front door of the residence was kicked in, causing damage to the residence in an amount exceeding \$750.00.

CP 139.

Following acceptance of the plea, the court ordered a risk assessment in support of her request for a sentence under the Drug Offender Sentence

Alternative (DOSA). Sentencing was scheduled for May 11, 2016. RP (March 30, 2016) at 8.

The DOSA Risk Assessment Report was filed May 6, 2016, and contained the following statement regarding the residential burglary charge:

In September, 2015, Robert Collins was interviewed by Lewis County deputies at the Thurston County Jail. Collins informed the deputies that Janet Gleason was the individual that committed the burglary. Gleason requested that Collins take her to the residence in her vehicle. Collins stated that when they arrived at the residence, Gleason exited the vehicle by herself, entered the residence, and came out with a container holding the items that were taken out of the home. Collins said that Gleason knew that the residence belongs to Prosecuting Attorney, Jonathan Meyer, and that she stole the items in retaliation for prosecuting her son. Detective's confirmed that Gleason's son was prosecuted by Meyer.

CP 89 (15-1-00537-21).

Gleason did not appear in court for sentencing on May 11, 2016 and the court issued a bench warrant for her arrest.

2. Change of plea in Cause No. 16-1-251-21 and sentencing:

Gleason was subsequently arrested and was charged with bail jumping for failing to appear for sentencing. CP 1-2 (16-1-00251-21). The three cases were heard by the Honorable Richard Brosey on June 15, 2016 for change of plea in cause no. 16-1-00251-21, and sentencing in all three cases.

RP (June 15, 2016) at 2-22; CP 19-30 (16-1-00251-21). After accepting her

guilty plea, the court sentenced Gleason in the three cases. RP (June 15, 2016) at 12-22; CP 99-110 (15-1-00537-21), CP (15-1-00594-21), CP 31-41 (16-1-00251-21).

During allocution the following colloquy took place:

MS. GLEASON: I just want to say that I'm very sorry for any involvement in this. And I'm just asking for a DOSA sentence. And clearly I need the help to be a better mom and better citizen. The structure would be good for me when I get out. And I'm sorry.

THE COURT: So why was it that this residential burglary took place?

MS. GLEASON: I gave a friend a ride and he—he did all this in real intention and when I realized it, I didn't know what to do. I just—I just waited, you know.

THE COURT: You're telling me you didn't know whose house it was?

MS. GLEASON: I absolutely did not know. I could not even tell you what Mr. Meyers looked like until I came to jail on that charge and then I seen it in the phone book. His picture in the phone book.

RP (June 15, 2016) at 15.

Prosecuting Attorney Jonathan Meyer, during his victim impact statement, said that the burglary of his house “was revenge, pure and simple.” RP (June 15, 2016) at 17.

Defense counsel argued for DOSA based on her long history of drug addiction, and asked that the sentences in the three causes be served concurrently. RP (June 15, 2016) at 11. The State argued for a total of 84

months in cause no. 15-1-00537-21 and 15-1-00594-21, and 51 months for the bail jumping conviction, to be served consecutively to the other two sentences. RP (June 15, 2016) at 10.

The court denied the motion for prison-based DOSA based on its belief that Gleason committed the burglary and malicious mischief charges as revenge against Meyer for prosecution of Gleason's son in juvenile court. RP (June 15, 2016) at 18. The court stated:

In all the years that I've been on the bench as a judge, I've seen an awful lot of residential and, for that matter, commercial burglaries that are burglaries that have come before me. I can't remember, quite frankly, another case where by all indications that burglary was committed as a result of a desire to extract revenge for something that was done by the victim. And that puts this burglary in a whole other category which, quite frankly, I have not seen in all the year that I've been an attorney or a judge. And I think under the circumstances that in and of itself would be sufficient to disqualify.

RP (June 15, 2016) at 18-19.

The judge also stated that he was denying DOSA because he intended to order that the bail jump be served consecutively to the two earlier cases.

The judge stated:

We have the issue of the request for consecutive sentence with response to the bail jump. And I'm not inclined to grant somebody a prison DOSA and then turn around and impose a consecutive for bail jump.

I supposed in this particular instance the Court has some discretion whether to impose a consecutive or concurrent time with respect to

the bail jump because even though the pleas have been taken, the actual sentence have not been completed so it was not like some of the cases where the statute mandate that it be a consecutive sentence by virtue of the fact that the other case is complete. But I think under the circumstances all of the facts here militate in favor of the Court granting a consecutive sentence.

RP (June 15, 2016) at 19.

The court sentenced Gleason to 84 months for count 1 and count 2, and 29 months for count 3 in cause no. 15-1-00594-21, to be served concurrently, and 84 months for the VUCSA conviction, to be served concurrently. RP (June 15, 2016) at 20. The court sentenced Gleason to 60 months for bail jumping, to be served consecutively to the other two cause numbers, for total confinement of 144 months. RP (June 15, 2016) at 19; CP 147 (15-1-00594-21), CP 35 (16-1-00251-21).

Gleason timely filed notice of appeal on July 13, 2016. CP 57 (15-1-00594-21). This appeal follows.

D. ARGUMENT

1. **THE TRIAL COURT VIOLATED THE REAL FACTS DOCTRINE WHEN IT DENIED A DOSA SENTENCE AND IMPOSED A CONSECUTIVE SENTENCE BASED UPON A VICTIM IMPACT STATEMENT AND DOSA RISK ASSESSMENT THAT CONTAINED AN ALLEGATION NEITHER ADMITTED BY THE DEFENDANT NOR PROVEN BY THE STATE.**

- a. The “real facts” doctrine prohibits a court from considering facts at sentencing that have not been agreed to or proved.

RCW 9.94A.530 codifies the “real facts” doctrine, which prohibits trial courts from relying on either (1) facts that compose the elements of an additional, unproven crime, or (2) facts that would elevate the degree of the charged crime. *State v. Wakefield*, 130 Wn.2d 464, 475-76, 925 P.2d 183 (1996); *State v. Barnes*, 117 Wn.2d 701, 707, 818 P.2d 1088 (1991); *State v. Morreira*, 107 Wn.App. 450, 458, 27 P.3d 639 (2001). The “real facts” doctrine requires the sentence be based only on the defendant's current conviction, his criminal history, and the circumstances surrounding the crime. *Morreira*, 107 Wn.App. at 458; *State v. Taitt*, 93 Wn.App. 783, 790, 970 P.2d 785 (1999), review denied, 145 Wn.2d 1013 (2001).

The doctrine was adopted in order to limit sentencing decisions to facts which are acknowledged, proven or pleaded. *State v. Houf*, 120 Wn.2d 327, 332, 841 P.2d 42 (1992). Courts have also interpreted the doctrine as excluding consideration during sentencing of uncharged crimes or charged crimes that were later dismissed. *Houf*, 120 Wn.2d at 332; *State v. McAlpin*, 108 Wn.2d 458, 466, 740 P.2d 824 (1987).

RCW 9.94A.530(2) states in relevant part:

In determining any sentence other than a sentence above the

standard range, the trial court may rely on no more information than is admitted by the plea agreement, or admitted, history presented at the time of sentencing. Where the defendant disputes material facts, the court must either not consider the fact or grant an evidentiary hearing on the point. The facts shall be deemed proved at the hearing by a preponderance of the evidence. Facts that establish the elements of a more serious crime or additional crimes may not be used to go outside the standard sentence range except upon stipulation or when specifically provided for in RCW 9.94A.535(2)(d), (e), (g), and (h).

RCW 9.94A.530(2). Appendix A.

Here, the trial court relied on the unproved allegation that the residential burglary of the prosecutor's house was done as revenge for prosecuting Gleason's son in Lewis County juvenile court to deny DOSA and impose a consecutive sentence. This violated the real facts doctrine and remand for resentencing is therefore necessary.

b. Gleason may raise the sentencing issues contained in this brief on appeal.

Generally, a standard range sentence may not be appealed. RCW 9.94A.585(1). That statute does not place an absolute prohibition on the right of appeal; rather, it only precludes review of challenges to the amount of time imposed when the time is within the standard range. *State v. McGill*, 112 Wn.App. 95, 99, 47 P.3d 173 (2002). See also, *State v. Paine*, 69 Wn. App.873, 881, 850 P.2d 1369 (1993). A defendant may appeal a standard

range sentence if the sentencing court failed to follow a procedure required by the Sentencing Reform Act. *State v. J.W.*, 84 Wn. App. 808, 811, 929 P.2d 1197 (1997) (citing *State v. Mail*, 121 Wn.2d 707, 712, 854 P.2d 1042 (1993)). This Court may reverse a sentencing court's decision if it finds a clear abuse of discretion or misapplication of the law. *State v. Porter*, 133 Wn.2d 177, 181, 942 P.2d 974 (1997) (citing *State v. Elliott*, 144 Wn.2d 6, 17, 785 P.2d 440 (1990)). A defendant is not barred from appealing a standard range sentence when the appeal raises a challenge to the sentencing court's determination of eligibility for a sentencing alternative. See *State v. Mail*, 121 Wn.2d at 712; *State v. McNeair*, 88 Wn. App. 331, 336-37, 944 P.2d 1099 (1997); *State v. Garcia-Martinez*, 88 Wn. App. 322, 328-30, 944 P.2d 1104 (1997). Therefore, a defendant "may appeal a standard range sentence if the sentencing court failed to comply with procedural requirements of the [Sentencing Reform Act of 1981, ch. 9.94A RCW] or constitutional requirements." *State v. Osman*, 157 Wn.2d 474, 481-82, 139 P.3d 334 (2006).

As a general rule, a reviewing court will not reverse a trial court's decision not to grant a DOSA sentence. *State v. Grayson*, 154 Wn.2d 333,

338, 111 P.3d 1183 (2005) (citing RCW 9.94A.585(1); *State v. Bramme*, 115 Wn.2d 844, 850, 64 P.3d 60 (2003)). Nevertheless, a defendant may challenge the procedure by which the sentence was imposed, as every defendant is entitled to request the trial court to properly consider such a sentence and give the request meaningful consideration. *Grayson*, 154 Wn.2d at 342. In addition, a defendant is entitled to a review of the denial of a DOSA request in order to correct a legal error or the trial court's abuse of discretion. *State v. Williams*, 149 Wn.2d 143, 147, 65 P.3d 1214 (2003); *State v. White*, 123 Wn.App. 106, 114, 97 P.3d 34 (2004).

A sentencing court abuses its discretion by refusing to exercise its discretion or by relying on an impermissible basis for its sentencing decisions. *State v. Garcia-Martinez*, 88 Wn. App. at 330. Here, the sentencing court erred by denying the defense request for prison-based DOSA based on its apparent acceptance as fact of the allegation that the burglary of Meyer's house was committed as an act of revenge, in violation of the real facts doctrine. In his victim impact statement to the court, Meyer asserted that Gleason had committed the residential burglary as an act of "revenge, pure and simple" and that it was an "attack on the entire system." RP (June 15, 2016) at 17.

The court considered this allegation and the statement contained in the Risk Assessment as evidence in denying Gleason's request for a DOSA sentence and by ordering the conviction for bail jumping to be served consecutively to the other charges, in spite of Gleason's denial that the burglary was done as revenge for the prosecution of her son. RP (June 15, 2016) at 15.

As noted above, the real facts doctrine prohibits trial courts from relying on either (1) facts that compose the elements of an additional, unproven crime, or (2) facts that would elevate the degree of the charged crime. *Wakefield*, 130 Wn.2d at 475-76. Here, the allegation that the burglary was committed as an act of revenge constitutes an additional crime under RCW 9A.76.180. The residential burglary, and in particular breaking in Meyer's front door, constitutes a violation of RCW 9A.76.180, the statute prohibiting intimidation of a public servant. A person commits the crime of intimidating a public servant if, "by use of a threat, he attempts to influence a public servant's vote, opinion, decision, or other official action as a public servant." Appendix B. Under RCW 9A.04.110(23), public servant "means any person other than a witness who presently occupies the position of or has been elected, appointed, or designated to become any officer or employee of

government, including a legislator, judge, judicial officer, juror, and any person participating as an advisor, consultant, or otherwise in performing a governmental function.”

Here, the allegation of the burglary can be considered an attempt to intimidate Meyer. This was apparently how Meyer himself viewed the burglary. Meyer told the sentencing judge during his statement that his daughter came home and discovered the front door was kicked in. RP (June 15, 2016) at 16. He stated that “to come to my home and do it is not only an attack on me, an attack on my entire family, but an attack on the entire system.” RP (June 15, 2016) at 16.

In addition to constituting an unproven new offense, the allegation that the burglary was committed as revenge against Meyer may also be considered an unproven aggravating factor. A crime committed to obtain revenge against a public official is sufficient to constitute an aggravating factor. Under RCW 9.94A.535(3)(x), a sentence above the standard range is justified if “[t]he defendant committed the offense against a public official or officer of the court in retaliation of the public official's performance of his or her duty to the criminal justice system.” Here, the assertion that the burglary was revenge amounted to an uncharged, unproven aggravating factor that

elevated the seriousness of the residential burglary. The court's use of the allegation contained in the DOSA risk assessment and the victim statement in considering the sentence to be imposed or whether Gleason should receive a DOSA, violated the "real facts" doctrine and RCW 9.94A.530.

c. The trial court abused its discretion by imposing a consecutive sentence.

The sentencing court ordered the sentence in cause no. 16-1-00251-21 to be served consecutively to Gleason's sentences under the other cause numbers. RP (June 15, 2016) at 20. Under the Sentencing Reform Act of 1981 (SRA), a sentencing court has discretion to impose consecutive sentences subject to the following provision:

[W]henever a person is to be sentenced for two or more current offenses, the sentence range for each current offense shall be determined by using all other current and prior convictions as if they were prior convictions Sentences imposed under this subsection shall be served concurrently. Consecutive sentences may only be imposed under the exceptional sentence provisions of RCW 9.94A.535....

RCW 9.94A.589(1)(a). The plain language of RCW 9.94A.589(1)(a) indicates that it applies "whenever a person is to be sentenced for two or more current offenses". RCW 9.94A.525(1) defines "other current offenses" as "[c]onvictions entered or sentenced on the same date as the conviction for

which the offender score is being computed...within the meaning of RCW 9.94A.589.”

In *State v. Smith*, 74 Wn.App. 844, 853-54, 875 P.2d 1249 (1994), review denied, 125 Wn.2d 1017 (1995), this Court held that under the SRA, sentences for multiple convictions entered on the same date cannot be ordered to run consecutively absent a determination that grounds for imposing an exceptional sentence exist. *Smith*, 74 Wn.App. at 853.

RCW 9.94A.589(1)(a), however, ordinarily does not apply in a situation where a defendant is sentenced on a single day for convictions entered on separate days. However, Washington courts have carved out an exception when the court “merely completed the overdue task of sentencing” because the defendant “absconded to avoid sentencing.” *State v. Moore*, 63 Wn.App. 466, 469, 470, 820 P.2d 59 (1991) (rejecting defendant's argument that all of his sentences should have run concurrently because he absconded to avoid sentencing on some of the offenses and “[b]y doing so, he prevented those sentences from being entered when they normally would have been. ... To order the [sentences] to run concurrently ... would in effect reward [the defendant]” for absconding); accord *Smith*, 74 Wn.App. at 853-54. Here,

Gleason falls within the exception created in *Moore* and adopted by this Court in *Smith*.

Nevertheless, the court abused its discretion by apparently accepting the allegation that the burglary was committed as revenge, contrary to the real facts doctrine, in imposing consecutive sentences.

Generally, a sentencing court's decision of whether sentences for two or more offenses are to run concurrently or consecutively is discretionary. The standard of review is the abuse of discretion standard, i.e. either discretion was manifestly unreasonable or it was exercised on untenable grounds or for untenable reasons. *State v. Batten*, 16 Wn.App. 313, 556 P.2d 551 (1976).

d. Gleason is entitled to reversal of her sentence and remand for resentencing before a new judge.

Reversal of the sentence and remand for resentencing is the remedy for a violation of RCW 9.94A.530 and the real facts doctrine. *Morreira*, 107 Wn.App. at 459-60 (review of "real facts" remand hearing); *State v. Strauss*, 54 Wn.App. 408, 423, 773 P.2d 898 (1989) (remand for "real facts" hearing).

The court violated the real facts doctrine when it adopted the unproven allegation that Gleason's participation in the burglary was an act of revenge when it denied her DOSA and imposed a consecutive sentence in

16-1-00251-21. Gleason did not agree to the facts and explicitly denied that the burglary was an act of revenge. RP (June 15, 2016) at 17. The State did not prove this fact at a trial or any hearing. It is clear the sentencing judge violated the provisions of RCW 9.94A.530. As such Gleason is entitled to be resentenced free of any consideration of the allegation. The only way that can occur is if resentencing occurs before a new judge. See *State v. Aguilar-Rivera*, 83 Wn. App, 199, 203, 920 P.2d 623 (1996) (when trial court inadvertently omits allocution until after intended sentence announced “the remedy is to send the defendant before a different judge for a new sentencing hearing.”). In light of the court's specific comments regarding the burglary discussed above, there is little doubt that the denial of DOSA and consecutive sentence imposed were the product of improper consideration of the allegation associated with an unproven, new offense and aggravating factor of the residential burglary, in violation of the real facts doctrine. Therefore, as in *Morreira*, remand for resentencing is required.

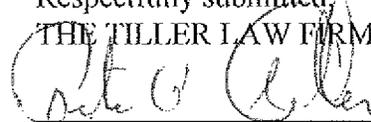
E. CONCLUSION

The trial court erred when it refused to give a DOSA sentence and imposed a consecutive sentence based upon its consideration of a fact neither admitted by the defense nor proven by the State at an evidentiary hearing. As

a result, this court should reverse the sentence and remand the case for sentencing in front of a new judge.

DATED: December 22, 2016.

Respectfully submitted,
THE TILLER LAW FIRM

A handwritten signature in cursive script, appearing to read "Peter B. Tiller", is written over a horizontal line.

PETER B. TILLER-WSBA 20835
Of Attorneys for Janet Gleason

CERTIFICATE OF SERVICE

The undersigned certifies that on December 22, 2016, that this Appellant's Corrected Opening Brief was sent by the JIS link to Mr. David Ponzoha, Clerk of the Court, Court of Appeals, Division II, 950 Broadway, Ste.300, Tacoma, WA 98402-4454 , and copies were mailed by U.S. mail, postage prepaid, to the following:

Ms. Sara Beigh Lewis County Prosecutors Office 345 W Main St. Fl 2 Chehalis, WA 98532-4802 appeals@lewiscountywa.gov	Mr. David Ponzoha Clerk of the Court Court of Appeals 950 Broadway, Ste.300 Tacoma, WA 98402-4454
Ms. Janet Gleason DOC# 798819 Washington Corrections Center for Women 9601 Bujacich Rd. NW Gig Harbor, WA 98332-8300 <u>LEGAL MAIL/SPEICAL MAIL</u>	

This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Centralia, Washington on December 22, 2016.



PETER B. TILLER

RCW 9.94A.530

Standard sentence range.

(1) The intersection of the column defined by the offender score and the row defined by the offense seriousness score determines the standard sentence range (see RCW 9.94A.510, (Table 1) and RCW 9.94A.517, (Table 3)). The additional time for deadly weapon findings or for other adjustments as specified in RCW 9.94A.533 shall be added to the entire standard sentence range. The court may impose any sentence within the range that it deems appropriate. All standard sentence ranges are expressed in terms of total confinement.

(2) In determining any sentence other than a sentence above the standard range, the trial court may rely on no more information than is admitted by the plea agreement, or admitted, acknowledged, or proved in a trial or at the time of sentencing, or proven pursuant to RCW 9.94A.537. Acknowledgment includes not objecting to information stated in the presentence reports and not objecting to criminal history presented at the time of sentencing. Where the defendant disputes material facts, the court must either not consider the fact or grant an evidentiary hearing on the point. The facts shall be deemed proved at the hearing by a preponderance of the evidence, except as otherwise specified in RCW 9.94A.537. On remand for resentencing following appeal or collateral attack, the parties shall have the opportunity to present and the court to consider all relevant evidence regarding criminal history, including criminal history not previously presented.

(3) In determining any sentence above the standard sentence range, the court shall follow the procedures set forth in RCW 9.94A.537. Facts that establish the elements of a more serious crime or additional crimes may not be used to go outside the standard sentence range except upon stipulation or when specifically provided for in RCW 9.94A.535(3)(d), (e), (g), and (h).

APPENDIX A

RCW 9A.76.180

Intimidating a public servant.

- (1) A person is guilty of intimidating a public servant if, by use of a threat, he or she attempts to influence a public servant's vote, opinion, decision, or other official action as a public servant.
- (2) For purposes of this section "public servant" shall not include jurors.
- (3) "Threat" as used in this section means:
 - (a) To communicate, directly or indirectly, the intent immediately to use force against any person who is present at the time; or
 - (b) Threats as defined in RCW 9A.04.110.
- (4) Intimidating a public servant is a class B felony.

TILLER LAW OFFICE

December 22, 2016 - 4:49 PM

Transmittal Letter

Document Uploaded: 7-491796-Appellant's Brief.pdf

Case Name: State v. Janet Gleason

Court of Appeals Case Number: 49179-6

Is this a Personal Restraint Petition? Yes No

The document being Filed is:

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: _____

Answer/Reply to Motion: _____

Brief: Appellant's

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: _____

Hearing Date(s): _____

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

Comments:

No Comments were entered.

Sender Name: Kirstie Elder - Email: kelder@tillerlaw.com