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Court of Appeals
Division II
State of Washington

No. 49282-2-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

J.Y.-H.

Appellant.

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

The Honorable Christopher Wickham
Cause No. 16-8-00174-1

BRIEF OF RESPONDENT

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A. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR.

1. Whether the trial court erred in concluding statute RCW 9A.16.100 negated the child's self-defense claim against the parent

2. Whether the trial court's finding that Ahmed used "minimal," "reasonable" and "moderate" force was supported by the record.

3. Whether the trial court's finding that J.Y.-H. lacked sufficient fear of injury or force was in error.

4. Whether the lack of written findings of fact place J.Y.-H. in a position of prejudice.

B. STATEMENT OF THE CASE.

1. Substantive Facts

J.Y.-H. was thirteen years old on April 24, 2016 when the police were called to her mother's residence in response to Ms. Ahmed's call, exclaiming that she had been assaulted by her daughter. Earlier that day Ms. Ahmed and J.Y.-H. had been arguing about J.Y.-H. leaving the house without telling her mother where she was going. RP 51. When told to stay in the house, J.Y.-H. went to her room for several minutes. J.Y-H. then came down out of her room and was sitting on the kitchen floor, where she had her cell phone that she was not supposed to have, RP 21.

Ms. Ahmed asked J.Y.-H. to go to her room again and she refused, instead choosing to cuss her out and call her "a bitch," RP 80. Ms. Ahmed then told J.Y.-H. that she would physically take her to her room if she refused to go. R 43. At this time Ms. Ahmed said J.Y.-H. was "not showing any respect" and was being "belligerent." RP 43.

According to Ms. Ahmed, she went to grab J.Y.-H. by the coat, near her sleeve, RP 43, taking a couple seconds to try and move her. RP 54. J.Y.-H. unzipped her jacket and slipped out of it, RP 43-44, causing Ms. Ahmed to involuntarily take two steps backwards. RP 44. J.Y.-H. then kicked her on the shin. RP 44.

According to J.Y.-H., Ms. Ahmed grabbed her by the head, and attempted to drag her. RP 65- 67. Because J.Y.-H. had trouble breathing she unzipped her hood and slipped out. RP 65. When Ms. Ahmed came towards J.Y.-H. again, she retaliated by kicking her mother in the shin, RP 44, using the force of her whole leg. RP 74. J.Y.-H. said she was scared of her mother, RP 69, but she stayed in the kitchen after the incident occurred because her mother had left to another room and so she figured the kitchen was safe. RP 83.

Both parties agree that after she had been kicked Ms. Ahmed threw her arms in the air and called the police. RP 44. At that time J.Y.-H. was sitting on the floor laughing at Ms. Ahmed before she locked herself in the bathroom. RP 45, 49. While in the bathroom J.Y.-H. posted the encounter on Facebook. RP 46.

When Officer Gabor arrived at the home Ms. Ahmed told him that she had been in an argument with her daughter, and that her daughter was yelling and swearing at her. RP 17. After asking, and attempting to take J.Y.-H. to her room she kicked her in the knee. RP 17. Officer Gabor observed that J.Y.-H. had very slight pink marks on the inside of her upper right arm that were barely visible, and not in need of medical assistance. RP 22-23. Also, Officer Gabor did not take pictures of Ms. Ahmed's injury as it was not severe. RP 25. J.Y.-H. then spent a total of six days in detention where she showed her bruises only to an attorney that came to visit her. RP 77.

2. Procedural Facts

J.Y.-H. was convicted of Assault In the Fourth Degree, and sentenced to twelve months of probation. RP 114.

C. ARGUMENT.

1. The Trial Court Did Not Err In Rejecting J.Y.-H.'s Self-Defense Claim.

The trial court correctly held that J.Y.-H. did not act in self-defense but committed an Assault in the Fourth Degree against Ms. Ahmed. The court of appeals should affirm the trial court's decision that J.Y.-H. is "guilty beyond a reasonable doubt of assault in the fourth degree." RP 107. In Washington, assault as defined by the common law comprises "(1) an attempt, with unlawful force, to inflict bodily injury upon another; (2) an unlawful touching with criminal intent; and (3) putting another in apprehension of harm whether or not the actor intends to inflict or is incapable of inflicting that harm." State v. Jarvis, 160 Wn. App. 111, 117, 246 P.3d 1280 (2011) (quoting State v. Walden, 67 Wn. App. 891, 893-94, 841 P.2d 81 (1992). The intent required for assault is the intent to make contact, not the intent for the contact to be malicious or criminal. Jarvis, 160 Wn. App. at 119. Assault in the fourth degree is an assault of another person that does not amount to assault in the first, second or third degree. Id. at 117.

To establish self-defense a defendant must produce credible evidence showing that he or she had a good faith belief in the

necessity of force, and that that belief was objectively reasonable. State v. Dyson, 90 Wn. App. 433, 438-39, 952 P.2d 1097 (1997). The credible evidence is examined subjectively from the standpoint of a reasonably prudent person knowing all the defendant knows, and seeing all the defendant sees. State v. Janes, 121 Wn.2d 220, 238, 850 P.2d 495 (1993). Once the defense makes the initial showing of self-defense, the burden of proof then shifts to the State to disprove self-defense beyond a reasonable doubt.

> "The use, attempt, or offer to use force upon or toward the person of another is not unlawful whenever used by a party about to be injured, or by another lawfully aiding him or her, in preventing or attempting to prevent an offense against his or her person, or a malicious trespass, or other malicious interference with real or personal property lawfully in his or her possession, in case the force is not more than necessary."
>
> RCW 9A.16.020(3).

The defendant must have a reasonable, subjective belief that he is about to be injured, the action taken is to prevent the offense against him, and the force is not more than necessary. State v. Kyllo, 166 Wn.2d 856, 863, 215 P.3d 177 (2009).

Parents are allowed to use force against their children when engaged in reasonable parental discipline, and may inflict corporal

punishment so long as the marks left are transient or temporary. RCW 9A.16.100.

J.Y.-H. assaulted her mother by kicking her in the leg, when she refused to go to her room. RP 44. Ms. Ahmed told her to go to her room and attempted to take her to her room, during that time J.Y.-H. "was cussing at (her) and being very disrespectful," RP 41, in front of the other children in the home. RP 42. J.Y.-H. was sitting on the kitchen floor when her mother tried to physically take her to her room by grabbing her by the sweatshirt. RP 43. J.Y-H. slipped out and when Ms. Ahmed went back towards J.Y.-H. to possibly grab her arm, J.Y.-H. kicked Ms. Ahmed below her knee. RP 44.

1. The trial court correctly rejected J.Y.-H.'s self-defense claims on the basis of statute RCW 9A.16.100.

The trial court correctly held that J.Y.-H. did not act in self-defense but assaulted her mother, Ms. Ahmed, who was acting lawfully under the parental discipline statute, RCW 9A.16.100. The Parental Discipline Rule provides in part that a parent may physically discipline a child so long as it is reasonable and moderate, for the purposes of correcting the child. Self-defense permits the use of force that would otherwise be unlawful by a party

about to be injured, to prevent the offense against him, so long as the force used is not more than necessary. RCW. 9A.16.100.

In State v. Graves, the father (Graves) told his son (Ricco) that he had to do chores as punishment, when Ricco refused, Graves called him a punk and grabbed his chin, Ricco then pushed him and the two wrestled on the bed. State v. Graves, 97 Wn. App. 55, 57-58, 982 P.2d 627 (1999). After Graves "subdued" Ricco, he told him to do his chores, and when Ricco again refused, they wrestled and Graves lay on top of Ricco while his wife called the police. Id. at 58. Ricco's conviction of fourth degree assault was reversed because he showed credible evidence to prove self-defense. Id. at 63. The trial court specifically found that "Ricco had no right to self-defense in that a parent has a right to use reasonable force to discipline a child." Id. at 61.

In the case at hand, J.Y.-H. was disobeying her mother's order that she go to her room. Instead of obliging, she was swearing at her, and being disrespectful. RP 41. When her mother grabbed her to attempt to take her to her room, J.Y.-H. kicked her below the knee. RP 44. The force used in Graves was far greater than the force used by Ms. Ahmed. In Graves, the father wrestled with his son and was physically on top of his son on multiple

occasions. Id. at 58. Also the father was the one calling his son a "punk," Id. at 58, whereas in this case the disobedient daughter was calling her mother a "bitch." RP 80. The environment was not nearly as physical in this case as in Graves, where J.Y.-H. would be excused from her assault of her mother because of self-defense. In Graves, Ricco wrestled his father to get out from underneath him, and Graves admitted starting the incident. Graves, 97 Wn. App. at 61. However, J.Y.-H. kicked her mother out of anger. RP 80. Also Ricco's acts towards his father came while his father was in contact with him, wrestling him. Id. at 60. But when J.Y.-H. kicked Ms. Ahmed, Ms. Ahmed was using minimal force to control her child. RP 105. J.Y.-H.'s kick was an unconsented to use of force. The trial court correctly found that J.Y.-H. did not act in self-defense. Unlike Graves, the trial court here considered whether J.Y.-H. had met the burden of a self-defense claim, rather than ruling that the defense was not available as a matter of law. RP 106.

a. J.Y.-H. did not meet initial burden of proof for self-defense

First, J.Y.-H. did not meet her initial burden of proof to raise the defense of self-defense. To raise self-defense, the defendant must produce credible evidence showing good faith belief in the

necessity of force and that it was objectively reasonable. The good faith belief is subjective and viewed through the lens of the reasonably prudent person. Additionally, one is barred from raising a self-defense claim if they are the initial aggressor. State v. Bennett, 87 Wn. App. 73, 83, 940 P.2d 299 (1997).

Subjectively, J.Y.-H. understood the parent/child relationship and the authority her mother inherently had over her. RP 81. Furthermore the reasonably prudent person knows that parents and children are not on equal footing. J.Y.-H. acted in a way that showed she knew she was not in control, such as hiding her cell phone from her mother. RP 65. In trial, J.Y.-H. also testified that she was not in charge although she said she did not want to give her mother power. RP 70.

"The right of self-defense cannot be successfully invoked by an aggressor or one who provokes an altercation." State v. Riley, 137 Wn.2d 904, 909, 976 P.2d 624 (1999). Also no person may by any intentional action reasonably create a necessity for acting in self-defense and then use force toward another person. Id. at 908. Therefore if the defendant is the initial aggressor and their acts or conduct provoked the altercation then self-defense is not available as a defense. Id. J.Y.-H. created the opportunity to use force

towards her mother. Instead of simply obeying Ms. Ahmed and going to her room she used an unnecessary force. She did so not only through her words, calling Ms. Ahmed a "bitch," but also through her actions, by sitting on the floor and refusing to go to her room. RP 80.

The concurring opinion in Riley, states "when one provokes another to violence by words alone, by a combination of words and threatening behavior, or by threatening behavior alone, Anglo-American law has always held the provocateur may lose the benefit of arguing self-defense." Riley, 137 Wn.2d at 918. The opinion analogizes to someone shouting racial epithets at a funeral for an African-American civil rights leader. Id. at 917. Once adequately provoking the mourners to "rush" him, he reveals a concealed weapon, killing several and claiming self-defense. Id. Allowing such behavior is "contrary to law," and the aggressor should not be allowed to "escape responsibility for the consequences of his or her provocative behavior." Id. at 918. Similarly, J.Y.-H. provoked her mother to use reasonable parental discipline by refusing to go to her room and by swearing at her mother. RP 80. The trial court did not err in punishing J.Y.-H. for her provocative behavior.

b. Assuming J.Y.-H. did meet her initial burden, the self-defense claim can be disproved because there was not an offense for her to defend herself against.

If J.Y.-H. did meet the initial burden of self-defense then it can be disproven. For self-defense to be established three elements must be satisfied. First, there must be a reasonable belief that she is about to be injured. Second, the force used is to prevent an offense against her. Third, the force used cannot be more than necessary.

The trier of fact found that J.Y.-H. did not have a reasonable belief that she was about to be injured, stating, "what apparently she was concerned about was Ms. Ahmed continuing to try to force her to go to her bedroom." RP 106. Appellate review of a trial court's findings of fact and conclusions of law for abuse of discretion is limited to determining whether the trial court's findings are supported by substantial evidence in the record and, if so, whether the conclusions of law are supported by those findings of fact. Scott v. Trans-Sys., Inc., 148 Wn.2d 701, 707-08, 64 P.3d 1 (2003). Findings of fact are reviewed under a substantial evidence standard, defined as a quantum of evidence sufficient to persuade a rational fair-minded person the premise is true. Wenatchee

Sportsmen Ass'n v. Chelan County, 141 Wn.2d 169, 176, 4 P.3d 123 (2000). If the standard is satisfied, a reviewing court will not substitute its judgment for that of the trial court even though it may have resolved a factual dispute differently. Croton Chem. Corp. v. Birkenwald, Inc., 50 Wn.2d 684, 685, 314 P.2d 622 (1957). Here, the trial courts findings were supported by substantial evidence.

Unlike in Graves, where Graves was the aggressor, going into Ricco's room yelling at him, Graves, 97 Wn. App. at 62, J.Y.-H. assumed the role of the aggressor when she sat on the kitchen floor yelling and swearing at her mother. RP 80. In Graves, Ricco wrestled his father to get him off of him, Graves, 97 Wn. App. at 62, whereas J.Y.-H. kicked Ms. Ahmed after Ms. Ahmed had "used a fairly minimal amount of force to try and correct Respondent's behavior." CP 33. She was not fearful of harm or injury, instead she was fearful of the punishment, or consequences of her actions, because she was disobedient to her mother. Also, the force she used was not to prevent an offense against her, because her mother was not acting offensively towards her but was acting lawfully. Finally, the force used against Ms. Ahmed was more than necessary.

The trial court correctly held that J.Y-H. did not establish her claim for self-defense because there was no offense to prevent against. Even if J.Y.-H. was fearful of her mother, her mother was acting lawfully and legally under RCW 9A.16.100 therefore there was no offense to defend against. Ms. Ahmed used reasonable and moderate force against her daughter to correct her, and in doing so she left only temporary and transient marks on her arms.

2. The trial court did not err in finding Ms. Ahmed used "minimal," "moderate" and "reasonable" force.

The trial court was accurate in its finding that the force used by Ms. Ahmed was "minimal," "moderate" and "reasonable." Under the parental discipline rule, RCW 9A.16.100, a parent may discipline their child with force so long as the force is reasonable and moderate. "A parent has a right to use reasonable and timely punishment to discipline a minor child within the bounds of moderation and for the best interest of the child." State v. Singleton, 41 Wn. App. 721, 723, 705 P.2d 825 (1985). It must be determined "whether in light of all the circumstances the [parental] conduct itself, viewed objectively, would be considered excessive, immoderate, or unreasonable." Singleton. 41 Wn. App. at 723.

The circumstances to consider for determining whether the conduct was objectively reasonable are age, size, sex, physical condition, nature of the misconduct, the kind of marks left on the child and the nature of the instrument used for punishment. Singleton, 41 Wn. App. at 723.

In Graves, Graves initiated both encounters with Ricco and was much more physical with Ricco than Ms. Ahmed was with J.Y.-H. when she only grabbed her jacket. Graves had Ricco in a headlock, he grabbed him by the shoulders and the chin, and was on top of him multiple times. Graves, 97 Wn. App. at 60. Ms. Ahmed had J.Y.-H.'s jacket in her hands when she was attempting to get her to go to her room. CP 33. The force Graves used towards Ricco was considered within the bounds of the parental discipline rule, and because it was much greater force than Ms. Ahmed used, her actions are also permissible under the parental discipline rule. The trial court did not err in finding that Ms. Ahmed used fairly minimal force to correct the behavior of J.Y.-H.

3. The trial court did not err in finding that J.Y-H. lacked sufficient fear of force or injury.

J.Y.-H. did not believe she was going to be hurt. Her remaining in the kitchen and not fleeing to find help, or protection

from her mother but sitting on the floor laughing at Ms. Ahmed prior to locking herself in the bathroom to post the events on social media are not actions that display fear. RP 44. The trial court correctly found that there was no reasonable basis to find subjectively that J.Y.-H. believed she was going to be hurt. RP 106. The only contact is the pulling of the sweatshirt. J.Y.-H. was only concerned with Ms. Ahmed continuing to force her to her room. RP 106. Also, the trial court correctly found the use of force to resist is an assault unless there is a reasonable belief you are about to be injured, and that J.Y.-H. did not have the subjective belief she was going to be injured. RP 106. The injuries sustained by J.Y.-H. were minor and non-permanent, Officer Gabor called them "slight pink mark(s)" that were barely visible, and not in need of medical assistance. RP 22. There has been no evidence other than the pulling of the sweatshirt to raise "a reasonable basis or even subjectively a reason for Respondent to believe she was going to be hurt or injured by Ms. Ahmed." CP 33. J.Y.-H. was concerned with Ms. Ahmed's continued attempt to take her to her room. CP 33. The trial court accurately found that J.Y.-H. did not have a reasonable basis or a subjective belief that she was going to be hurt. CP 33.

4. The Findings of Fact and Conclusions of Law filed on June 19, 2017, correctly supplemented the Court's findings in the Order on Adjudication and do not create a prejudice to J.Y-H.

The trial court entered written findings of fact stating that J.Y-H. was found guilty at the adjudicatory hearing of Assault in the Fourth Degree. CP 6. J.Y-H. does not assign error to that finding of fact and correctly noted that the finding was "supported by detailed oral findings of fact and conclusions of law." Brief of Appellant at 9. Subsequently, the trial court entered more detailed findings of fact on June 19, 2017. CP 32-34.

"The court shall enter written findings and conclusions in a case that is appealed ... The prosecution must submit such findings and conclusions within 21 days ..." Wash. JUCR 7.11(d). Furthermore, "In a case tried without a jury, the court shall enter findings of fact and conclusions of law." Wash. CRR 6.1(d). The purpose of Wash. CRR 6.1(d) is to enable the appellate court to review questions raised on appeal. State v. Head, 136 Wn.2d 619, 622, 964 P.2d 1187 (1998). Written findings of fact are important because oral opinion does not have binding effect, Id., and the appellate court should not have to go through oral rulings. Id. at 624.

In State v. Head, the petitioner maintained that the absence of written findings of fact required reversal, Id. at 620, and the court remanded for entry of findings. Id. at 626. The court said that reversal on these grounds may be appropriate if the defendant can show they were prejudiced by the lack of written findings, or that the findings were tailored to meet the issues on appeal. Id. at 624-25. The dissent in Head, states that a delay of three years is an unnecessary delay, and shows prejudice. Id. at 628.

The Washington State Supreme Court considered the timeliness of findings under JUCR 7.11, in State v. Alvarez, 128 Wn. 2d 1; 904 P.2d 754 (1995). In Alvarez, the Court found that "an error by the court in entering judgment and sentence without findings of fact is remedied by subsequent entry of findings, conclusions and judgment." Id. at 19.

State v. Alvarez, followed the analysis in State v. Royal, which concluded that dismissal based on the untimely filing of written findings of fact is not automatic but the defendant must first show prejudice. State v. Alvarez, 128 Wn.2d 1, 18 (1995). See, State v. Royal, 122 Wn.2d 413, 424; 858 P.2d 259 (1993). Despite the trial court not complying with JUCR 7.11(d) the situation could be remedied without prejudice, and the petitioner would not be

subject to double jeopardy because there would not need to be a new trial, but the only purpose would be for adequate findings. Alvarez, 128 Wn.2d at 20-22. Alvarez also follows State v. Souza, which allowed for remand to establish a more adequate finding of facts, and stating that it did not subject the petitioner to double jeopardy. Id. quoting, State v. Souza, 60 Wn. App. 534, 805 P.2d 237 (1991).

In our case J.Y-H. has not been prejudiced by the late filing of detailed findings of fact. The findings of fact were based on the trial court's detailed oral ruling and are consistent with the verbal findings which J.Y-H. assigns error to.

D. CONCLUSION.

The trial court correctly rejected J.Y.-H.'s self-defense claim, and found J.Y.-H. guilty of Assault in the Fourth degree. The State respectfully requests this court to affirm J.Y.-H.'s convictions.

Respectfully submitted this 19 day of June, 2017.

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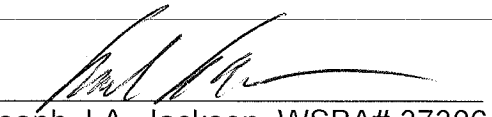
Prosecuting Attorney



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

Dated this 19th day of June, 2017, at Olympia, Washington.

Cynthia Wright

CYNTHIA WRIGHT, PARALEGAL

THURSTON COUNTY PROSECUTING ATTORNEY'S OFFICE

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