

No. 49322-5-II

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

QUALAGINE HUDSON,

Appellant.

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

BRIEF OF APPELLANT

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A. INTRODUCTION

This Court vacated Qualagine Hudson's judgment and sentence and remanded his case for an evidentiary hearing and resentencing in 2015. Reversal was required because the trial court refused to grant a hearing on whether Mr. Hudson had violated his plea agreement and contract with the State, in which Mr. Hudson agreed to cooperate with detectives in exchange for the dismissal of charges.

On remand, the State improperly relied on limited hearsay evidence that did not prove what the contract required of Mr. Hudson. Defense counsel failed to represent Mr. Hudson's interests at the hearing or challenge the State's case, and permitted Mr. Hudson to address the court about his sentencing concerns before the court issued its ruling on whether he had committed the violation.

The State's evidence at the hearing was insufficient to prove Mr. Hudson breached his agreement with the State. Defense counsel's failure to advocate for Mr. Hudson or challenge the State was unreasonable and prejudiced Mr. Hudson. This Court should reverse.

B. ASSIGNMENTS OF ERROR

1. The court denied Mr. Hudson his constitutional right to due process under article I, section 3 and the Fourteenth Amendment when it found he violated the plea agreement based on insufficient evidence.

2. In the absence of sufficient evidence, the trial court erred when it entered the findings of fact at lines 16-23 on page 3. CP 134.

3. In the absence of sufficient evidence, the trial court erred when it entered the findings of fact at lines 1-8 on page 4. CP 135.

4. In the absence of sufficient evidence, the trial court erred when it entered the finding of fact at line 9 on page 4 indicating Mr. Hudson had conceded the violation. CP 135.

5. The trial court erred when it entered the conclusions of law at lines 21-24 on page 4 and lines 1-8 on page 5. CP 135-36.

6. The doctrine of laches barred the State from relying on the King County conviction at the hearing.

7. Mr. Hudson was denied his right to the effective assistance of counsel under article I, section 22 and the Sixth Amendment.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. The State must prove by a preponderance of evidence a defendant has breached a plea agreement before it is relieved of its

obligation to fulfill its part of the bargain. Where the State did not present evidence of the contract's conditions, and Mr. Hudson indicated he made good faith efforts to comply with the contract, should this Court reverse?

2. The doctrine of laches bars a cause of action where a party delays in seeking relief and a change in condition occurs that would make it inequitable to enforce the claim. Where Mr. Hudson was alleged to have committed the crime in King County in 2012, but the State elected to prosecute him in 2015 only after it became likely it would need evidence of the conviction at the subsequent evidentiary hearing, did principles of equity bar the State from relying on the King County conviction to prove Mr. Hudson breached his contract with the State?

3. Defendants in criminal cases have the constitutional right to the effective assistance of counsel and a new hearing must be granted where counsel's performance was both deficient and prejudicial to the defendant. Should a new evidentiary hearing be granted where Mr. Hudson's defense counsel failed to object to hearsay evidence or otherwise contest the violation, and permitted statements Mr. Hudson

made for sentencing purposes to be used as substantive evidence against him?

D. STATEMENT OF THE CASE

The State charged Qualagine Hudson with eleven criminal counts related to his alleged involvement in stealing vehicles from dealerships and selling them. CP 7, 12. The charges included a strike offense of leading organized crime. CP 10, 19.

The State offered Mr. Hudson a plea deal that would require him to plead guilty but allow for his release and delay sentencing. CP 83. During the delay, Mr. Hudson would be required to work with Pierce County detectives to provide evidence to support the prosecution of other individuals. CP 84-85. In exchange for fulfilling this agreement, the State agreed to vacate ten of the eleven counts, leaving only an attempted theft of a motor vehicle conviction remaining, and recommend a standard range sentence on that count between 32.35 and 42.75 months. CP 87.

Mr. Hudson agreed to the State's offer and entered a plea of guilt on July 12, 2012, to all eleven charges. CP 26. Upon his release, he began working full time and remained in contact with detectives. 6/6/14 RP 10. However, in November of 2012, the State claimed Mr.

Hudson had committed a crime in King County and requested a bench warrant for his failure to comply with his conditions of release. CP 140. Mr. Hudson was immediately returned to jail but no charges were filed in King County. 7/22/16 RP 4.

While in jail, Mr. Hudson attempted to reach a new agreement with the State, but the State refused. 7/22/16 RP 3, 10.

Eighteen months later, in June of 2014, Mr. Hudson was returned to court for sentencing. 6/6/14 RP 1. The State sought to proceed at sentencing on all eleven counts and recommended a standard range sentence of 173.5 months on the count of leading organized crime. 6/6/14 RP 7. Mr. Hudson argued he had satisfied the terms of the agreement and the State was bound to uphold its end of the deal. 6/6/14 RP 3. He filed a motion to withdraw his plea or obtain specific performance. CP 62. The State agreed a hearing might be required to resolve whether Mr. Hudson had breached the terms of the contract, stating “[w]e’ll bring in the officers who were supposed to be his handler, and we can go through that process.” 6/6/14 RP 4.

The trial court denied Mr. Hudson’s request for an evidentiary hearing and immediately proceeded with sentencing over Mr. Hudson’s objection. 6/6/14 RP 5. It sentenced Mr. Hudson to 149 months on the

charge of leading organized crime, with the lesser sentences on the remaining counts to run concurrent. CP 50.

This Court reversed, finding Mr. Hudson was entitled to an evidentiary hearing.¹ It vacated his judgment and sentence and remanded Mr. Hudson's case for the hearing and resentencing.²

Only after Mr. Hudson sought relief in the Court of Appeals did the State file charges against Mr. Hudson in King County. 7/22/16 RP 4. Despite relying on the allegations in November 2012 to claim Mr. Hudson was in violation of his conditions of release, it chose not to charge Mr. Hudson in King County until October of 2015. 7/22/16 RP 5; CP 140.

Mr. Hudson pled guilty to the reduced charge of second degree taking a motor vehicle without permission in King County and received 22 months incarceration, to run concurrent with the Pierce County charges. Ex. 1. He was sentenced on March 28, 2016. Ex 1; 7/22/16 RP 4.

¹ *State v. Hudson*, No. 73938-7-I, 2015 WL 9462105, at *1 (Wash. Ct. App. Dec. 28, 2015) (unpublished opinion cited for procedural history, *see* GR 14.1).

² *Id.*

At the July 2016 evidentiary hearing, the State submitted Mr. Hudson's King County judgment and sentence and a related police report. Exs. 1 & 2; 7/22/16 RP 6. The State presented no testimony or evidence about the contract, and defense counsel offered no argument.

Believing the evidentiary hearing had concluded, and the judge had ruled against him, Mr. Hudson asked to speak to mitigating factors. 7/22/16 RP 7-8. The judge permitted Mr. Hudson to offer testimony. 7/22/16 RP 8. It then issued its ruling, stating it would deny Mr. Hudson's motion to withdraw his guilty plea "based on the evidence I've heard today." 7/22/16 RP 11. Based on its finding that Mr. Hudson had violated the agreement, it denied his request to hold a new sentencing hearing. 7/22/16 RP 12. Mr. Hudson is currently serving the sentence of 149 months incarceration first imposed in June 2014. CP 50.

E. ARGUMENT

1. Reversal is required because the State failed to satisfy its burden at the evidentiary hearing.

- a. The State must prove the defendant breached the plea agreement by a preponderance of the evidence.

Criminal defendants have the right to due process of law under article I, section 3 of the Washington Constitution and the Fourteenth

Amendment to United States Constitution. Const. art. I, § 3; U.S. Const. amend. XIV. Constitutional due process requires the State adhere to the terms of plea agreements with defendants because when an individual enters into such an agreement, he waives several important constitutional rights. *Santobello v. New York*, 404 U.S. 257, 92 S. Ct. 495, 30 L.Ed.2d 427 (1971); *State v. Sledge*, 133 Wn.2d 828, 839, 947 P.2d 1199 (1997). For example, a defendant waives his “right to a jury trial, to confront one’s accusers, to present witnesses in one’s defense, to remain silent, and to be convicted by proof beyond a reasonable doubt.” *In re Personal Restraint Pet. of James*, 96 Wn.2d 847, 849, 640 P.2d 18 (1982).

Unless the defendant has not complied with the agreement, the State is obliged to perform its end of the bargain. *James*, 96 Wn.2d at 849-50. To establish that the defendant has violated the agreement, fundamental fairness under due process requires:

an evidentiary hearing be held and that the defendant be given an opportunity to call witnesses and have other due process rights, including the requirement that the State prove, by a preponderance of the evidence, that the defendant has failed to perform his or her part of the agreement.

Id. at 850.

This “procedure is constitutionally required.” *Id.* Even when a defendant does not ask for an evidentiary hearing, the right is not waived. *Id.* at 851; *State v. Morley*, 35 Wn. App. 45, 47-48, 665 P.2d 419 (1983).

Constitutional issues, like questions of law, are reviewed de novo. *State v. Gresham*, 173 Wn.2d 405, 419, 269 P.3d 207 (2012).

b. The State failed to satisfy its burden at Mr. Hudson’s evidentiary hearing.

- i. *The State was not permitted to rely on hearsay to meet its burden.*

At Mr. Hudson’s evidentiary hearing, the State presented only a police report and Mr. Hudson’s judgment and sentence from the King County proceeding. Exs. 1 & 2; 7/22/16 RP 6. It offered no testimony from witnesses.

Mr. Hudson did not object to the admission of these exhibits and there was no discussion about how the evidence would be used by the trial court. 7/22/16 RP 8. However, at evidentiary hearings where similar rights are at stake, our supreme court has found hearsay evidence inadmissible. *See State v. Dahl*, 139 Wn.2d 678, 686, 990 P.2d 396 (1999).

In *Dahl*, the court considered the due process protections available to an individual facing the revocation of his suspended sentence. *Id.* at 683. The court found that such a hearing was not a criminal proceeding and an individual was entitled to “only minimal due process rights.” *Id.* The court further found that even where only minimal due process rights were afforded, “hearsay evidence should be considered only if there is good cause to forego live testimony.” *Id.* at 686 (citing *State v. Nelson*, 103 Wn.2d 760, 765, 697 P.2d 579 (1985)). It defined “good cause” as “difficulty and expense in procuring witnesses in combination with ‘demonstrably reliable’ or ‘clearly reliable’ evidence.” *Id.* at 686 (quoting *Nelson*, 103 Wn.2d at 765). The court found Mr. Dahl’s due process rights were violated because the evidence failed both prongs of the good cause test. *Id.* at 687.

Here there is no question the witnesses were available to testify, as the prosecutor represented “both detectives” were present for the hearing and the trial court found the detectives were “present at the hearing and ready to testify.” CP 135; 7/22/16 RP 3. The State simply chose not to call them. When the State presented only hearsay evidence, it failed to satisfy its burden to prove Mr. Hudson violated the plea agreement.

- ii. *The State's hearsay evidence did not address the conditions of the agreement.*

Even if the State was permitted to rely on hearsay evidence, the evidence it chose to present only indicated Mr. Hudson had committed a crime in September of 2012. Exs. 1 & 2. No evidence was offered to support its claim that the agreement was breached when Mr. Hudson committed a crime. For example, the State did not attempt to show the conditions of the agreement by offering the plea agreement and contract into evidence. *See* CP 84. Thus, although the State was not entitled to rely on hearsay evidence at the hearing, even if had been, the hearsay evidence it presented did not prove Mr. Hudson violated his contract with the State.

- iii. *Mr. Hudson's statements were intended for consideration at sentencing and do not support the trial court's findings.*

The trial court's written findings acknowledge the insufficiency of the State's evidence. The trial court found "[t]he detectives were present at the hearing and ready to testify consistent with the substance of the report" but that such testimony was unnecessary because "the defendant admitted to the violations and accuracy of the report." CP 135 (lines 5-8). The court also found Mr. Hudson made a number of

concessions in his statements to the court. CP 134 (lines 16-23); CP 135 (line 9). The court reached these findings in error.

Mr. Hudson did not admit to violating the agreement or the accuracy of the report when he addressed the court. In fact, he testified he had never been provided the opportunity to tell his side of the story. 7/22/16 RP 9. He explained that he had made “good-faith efforts” to work with the officers and that even though it was “kind of washed” after he was arrested on the bench warrant, he had “explanations and reasons why things went the way they did.” 7/22/16 RP 10. He described how he had attempted to assist officers despite his incarceration. 7/22/16 RP 10.

This was not an admission of a violation but instead a recognition of the fact that, after he returned to jail, it had become more difficult to fulfill the requirements of the plea agreement. The question as to whether Mr. Hudson had actually violated the plea agreement remained. As the trial court found, this question was *not* resolved by State’s exhibits alone. CP 135 (lines 1-8).

In addition, when Mr. Hudson addressed the court he believed the court had already ruled against him and the evidentiary hearing was

over. 7/22/16 RP 7-8. In requesting that Mr. Hudson be permitted to speak, defense counsel stated:

I understand the Court's position is now that we have a contract and that there's been an alleged breach by the State of that contract, and *there's been* an evidentiary hearing on that matter, but Mr. Hudson wants to address his performance on that contract which he believes is relevant to this issue.

7/22/16 RP 7-8 (emphasis added). When Mr. Hudson addressed the court, he apologized for "pushing something that the Court said was already a dead issue." 7/22/16 RP 11.

Mr. Hudson's assumption that the court had already found in the State's favor was reasonable given that prior to him testifying, the trial court found the violation "straightforward" based solely on the State's presentation of hearsay evidence. 7/22/16 RP 6. The court indicated there was nothing left to contest. 7/22/16 RP 6. The trial judge also gave the appearance the hearing was over when he permitted Mr. Hudson to address him directly, without the assistance of questioning by defense counsel or the challenge of cross-examination by the State. Believing that the hearing had concluded, Mr. Hudson approached his opportunity to speak to the court as a sentencing hearing, and asked the court to consider the efforts he had made to assist the detectives. 7/22/16 RP 9-10.

When the court misconstrued Mr. Hudson's statements as a concession in its written findings, it failed to quote Mr. Hudson, and the findings do not accurately reflect what Mr. Hudson actually said. CP 134 (lines 16-23); CP 135 (lines 1-9). Mr. Hudson was not questioned about whether the report was accurate or whether he believed he had violated the agreement. His statements to the judge indicated the opposite: that he had made "good-faith efforts" and believed he was *not* in violation of the contract. 7/22/16 RP 10.

- c. The doctrine of laches prevented the State from relying on Mr. Hudson's conviction in King County to prove he violated the agreement.

Finally, equitable considerations prevented the State from relying on the King County conviction to prove Mr. Hudson violated the agreement with the State. Our courts rely on basic principles of contract law when analyzing a plea agreement. *Sledge*, 133 Wn.2d at 838. "Just as there is an implied duty of good faith and fair dealing in every contract... the law imposes an implied promise by the State to act in good faith in plea agreements." *Id.* (internal citations omitted).

This Court regularly applies equitable principles in contract actions. *Kaintz v. PLG, Inc.*, 147 Wn. App. 782, 787, 197 P.3d 710 (2008). One such equitable doctrine is the doctrine of laches, which

bars actions that are inexcusably delayed and result in prejudice to the charged party. *Clark County Pub. Util. Distr. No. 1 v. Wilkinson*, 139 Wn.2d 840, 848, 991 P.2d 1161 (2000). As our supreme court has explained, the doctrine of laches:

does not arise from mere lapse of time alone, but arises upon lapse of time together with some intervening change in the condition or relation of the parties adversely affecting the rights of the party sought to be charged. To constitute laches, not only must there have been delay in the assertion of the claim, but some change in condition must have occurred which would make it inequitable to enforce the claim.

McKnight v. Basilides, 19 Wn.2d 391, 400, 143 P.2d 307 (1943)

(quoting *Lindblom v. Johnston*, 92 Wn. 171, 173, 158 P. 972 (1916)).

At the evidentiary hearing, the State relied on the fact Mr. Hudson had pled guilty to a crime in King County to prove he violated the terms of his agreement with the State. 7/22/16 RP 3. The agreement, which the State did not admit into evidence, stated that Mr. Hudson agreed not to “violate any municipal, county, state, or federal law.” CP 84 (paragraph 4).

However, the crime allegedly took place in September of 2012. Ex. 1. The State elected not to charge Mr. Hudson until three years later, in October 2015. 7/22/16 RP 5; CP 140. It made this decision shortly before this Court ruled Mr. Hudson had been wrongly denied an

evidentiary hearing to determine whether he violated the plea agreement. *Hudson*, No. 73938-7-I, 2015 WL 9462105, at *1.

In other words, only after the State became concerned Mr. Hudson might be granted a full evidentiary hearing on whether he had breached the contract did the State file charges in King County. It then relied on the King County conviction to argue no additional evidence at the hearing was necessary because the conviction alone caused Mr. Hudson to be in violation of the agreement. 7/22/16 RP 3.

Because the State delayed filing the charges, and did so only when faced with the possibility of having to demonstrate a breach of the contract, it was inequitable to permit the State to rely on this evidence at the hearing. *See McKnight*, 19 Wn.2d 391 at 400; *Arnold v. Melani*, 75 Wn.2d 143, 147, 449 P.2d 800 (1968) (the doctrine of laches bars an action where a party delays in seeking a claim and an intervening change in condition makes it inequitable to enforce the claim). Although the State did not prove Mr. Hudson violated the agreement based on the limited evidence it put forth at the hearing, it should not have been permitted to rely on the King County conviction in the first place.

d. Reversal is required.

Reversal is required where the State fails to prove, by a preponderance of the evidence, that a defendant breached his agreement with the State. *James*, 96 Wn.2d at 850. Here, the doctrine of laches barred the State from relying on Mr. Hudson's King County conviction to prove a violation of the agreement. Even if the State was permitted to rely on the conviction, the State failed to put forth sufficient evidence to meet its burden when it admitted only the judgment and sentence and a police report to support its claim. Mr. Hudson's statements to the court were intended for sentencing purposes and he did not concede the police report was accurate or that he had breached the agreement. This Court should reverse.

2. If this Court finds the trial court properly concluded the State satisfied its burden at the evidentiary hearing, reversal is required because Mr. Hudson was denied the effective assistance of counsel.

a. Mr. Hudson had the constitutionally protected right to the effective assistance of counsel at the evidentiary hearing.

A person accused of a crime has a constitutional right to the effective assistance of counsel. U.S. Const. amend. VI; Const. art. I, § 22; *United States v. Cronin*, 466 U.S. 648, 654, 104 S. Ct. 2039, 80 L. Ed. 2d 657 (1984); *State v. Khan*, 184 Wn.2d 679, 688, 363 P.3d 577

(2015). “The right to counsel plays a crucial role in the adversarial system embodied in the Sixth Amendment, since access to counsel’s skill and knowledge is necessary to accord defendants the ‘ample opportunity to meet the case of the prosecution’ to which they are entitled.” *Strickland v. Washington*, 466 U.S. 668, 685, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984) (quoting *Adams v. United States ex rel. McCann*, 317 U.S. 269, 276, 63 S. Ct. 236, 87 L. Ed. 2d 268 (1942)).

This right extends to every critical stage of a case, including sentencing. *State v. Bandura*, 85 Wn. App. 87, 97, 931 P.2d 174 (1997); *Gardner v. Florida*, 430 U.S. 349, 358, 97 S. Ct. 1197, 1204-05, 51 L. Ed. 2d 393 (1977). Under the *Strickland* standard, a new hearing should be granted if (1) counsel’s performance was deficient, and (2) the deficient performance prejudiced the defendant. 466 U.S. at 687; see also *State v. Grier*, 171 Wn.2d 17, 32-33, 246 P.3d 1260 (2011). “A claim of ineffective assistance of counsel presents a mixed question of fact and law [and is] reviewed *de novo*.” *State v. Sutherby*, 165 Wn.2d 870, 883, 204 P.3d 916 (2009).

b. Defense counsel's representation at the evidentiary hearing was deficient.

An attorney renders constitutionally inadequate representation when he or she engages in conduct for which there is no legitimate strategic or tactical basis. *State v. McFarland*, 127 Wn.2d 322, 335-36, 899 P.2d 1251 (1998). A decision is not permissibly tactical or strategic if it is not reasonable. *Roe v. Flores-Ortega*, 528 U.S. 470, 481, 120 S. Ct. 1029, 145 L. Ed. 2d 985 (2000); *see also Wiggins v. Smith*, 539 U.S. 510, 521, 123 S. Ct. 2527, 156 L. Ed. 2d 471 (2003) (“[t]he proper measure of attorney performance remains simply reasonableness under prevailing professional norms” (*quoting Strickland*, 466 U.S. at 688)).

Where defense counsel fails to object to inadmissible hearsay testimony that is crucial to the State's case, his performance is unreasonable. *State v. Hendrickson*, 138 Wn. App. 827, 833, 158 P.3d 1257 (2007). An attorney who does not attempt to defend his client's interests or attack the State's position is ineffective. *In re Welfare of J.M.*, 130 Wn. App. 912, 925, 125 P.3d 245 (2005).

Here, the *only* evidence presented by the State was hearsay evidence. Exs. 1 & 2; ER 801(c). Defense counsel was ineffective when he did not object to its admission or seek to limit the court's use

of this evidence, and then allowed Mr. Hudson to testify about mitigating circumstances before contesting the violation itself.

Defense counsel also alluded to the fact that the State had unfairly delayed its prosecution of Mr. Hudson in King County but failed to articulate this claim for the court. 7/22/16 RP 4-5. When the trial court questioned defense counsel about the fact the King County crime occurred in September of 2012, he stated, “I believe that’s correct” without elaborating further. At no time after the State presented its hearsay evidence, or Mr. Hudson addressed the Court, did defense counsel present argument on why the court should find in Mr. Hudson’s favor.

Mr. Hudson’s defense counsel did not provide him with the effective assistance of counsel during the hearing. As in *J.M.*, where this Court found the defense attorney ineffective for failing to challenge the State’s case in any meaningful way, here Mr. Hudson’s counsel wholly failed to contest the State’s allegation that Mr. Hudson had breached the contract. His performance at the evidentiary hearing was deficient.

- c. Reversal is required because defense counsel's deficient performance prejudiced Mr. Hudson.

If there is a reasonable probability that but for counsel's inadequate performance, the result would have been different, prejudice is established and reversal is required. *Strickland*, 466 U.S. at 694; *Khan*, 129 Wn.2d at 688. A reasonable probability "is a probability sufficient to undermine confidence in the outcome." *Strickland*, 466 U.S. at 694; *see also Estes*, 193 Wn. App. at 493 (a defendant must "show that counsel's deficient performance was prejudicial or undercut confidence in the result of the proceeding"). The "reasonable probability" standard is a lower standard than "more likely than not." *State v. Thomas*, 109 Wn.2d 222, 226, 743 P.2d 816 (1987).

Here, the State offered only hearsay evidence, which did not satisfy its burden at the hearing. *See* CP 135 (lines 5-9) (court's findings that this hearsay evidence, alone, did not satisfy the State's burden). If this Court determines the State nonetheless met its burden by a preponderance of the evidence, it did so only because defense counsel failed to effectively represent Mr. Hudson at the hearing by failing to object to the evidence, permitting Mr. Hudson to testify to mitigating factors before contesting the violation itself, and failing to articulate why the State's delay in charging Mr. Hudson in King

County resulted in an inequitable use of evidence at the hearing.

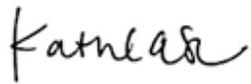
Prejudice has been established and this Court should reverse.

E. CONCLUSION

This Court should reverse Qualagine Hudson's convictions because the State failed to prove Mr. Hudson violated his plea agreement and contract with the State. In the alternative, this Court should reverse because Mr. Hudson was denied the effective assistance of counsel.

DATED this 29th day of August, 2017.

Respectfully submitted,



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**IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION TWO**

STATE OF WASHINGTON,)	
)	
Respondent,)	
)	
v.)	NO. 49322-5-II
)	
QUALAGINE HUDSON,)	
)	
Appellant.)	

DECLARATION OF DOCUMENT FILING AND SERVICE

I, MARIA ARRANZA RILEY, STATE THAT ON THE 29TH DAY OF AUGUST, 2017, I CAUSED THE ORIGINAL **OPENING BRIEF OF APPELLANT** TO BE FILED IN THE **COURT OF APPEALS – DIVISION TWO** AND A TRUE COPY OF THE SAME TO BE SERVED ON THE FOLLOWING IN THE MANNER INDICATED BELOW:

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[X] QUALAGINE HUDSON	(X)	U.S. MAIL
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SIGNED IN SEATTLE, WASHINGTON THIS 29TH DAY OF AUGUST, 2017.



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