

FILED
COURT OF APPEALS
DIVISION II

2016 DEC 22 PM 2:25

STATE OF WASHINGTON
BY _____
DEPUTY

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

STATE OF WASHINGTON,
Respondent,

VS.

MICHAEL NELSON,
Petitioner.

PERSONAL RESTRAINT PETITION

Pierce
11-1-04142-7

Michael Nelson
#898806 H5 B- 105
Stafford Creek Corr. Center
191 Constantine Way
Aberdeen, Wa 98520

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ASSIGNMENTS OF ERROR

1. Mr Nelson was deprived of the effective assistance of counsel under the Sixth and Fourteenth Amendment.
2. Defense counsel was ineffective when he denied Mr. Nelson the implicit right to control his own defense.

ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. The Sixth and Fourteenth Amendment guarantee an accused person the right to effective assistance of counsel. Here, defense counsel provided deficient performance that prejudiced Mr. Nelson when he failed to move for a severance of unrelated counts. Was Mr. Nelson denied his Sixth and Fourteenth Amendment right effective assistance of counsel?

A. STATUS OF PETITIONER

Michael Eric Nelson challenges his Pierce County Sentence and convictions for Robbery in the First Degree (along with a "Firearm" allegation), and unlawful Possession of a Firearm in the First Degree (11-1-04142-7). Nelson is currently serving a sentence of 168 months with 36 months of community custody as a result of a subsequent guilty finding after a jury trial.

B. STATEMENT OF FACTS

On October 11, 2011, Michael Nelson was charged by way of information with Robbery in the First Degree with a Firearm enhancement and gang aggravator. He was also charged with Unlawful Possession of a Firearm in the First Degree for a revolver found on October 10, 2011 in his alleged girlfriends house.

Testimony at trial by Caitlyn Dripps (alleged girlfriend), revealed that she was not Mr. Nelson's girlfriend, and that there were "a couple other guys" in her house the day the firearm was found by police; establishing that there was no legitimate connection between Mr. Nelson & the firearm/revolver in Caitlyn Dripps house. RP 193-94.

On March 5, 2013, Mr. Nelson was found guilty as charged by a jury. Nelson was subsequently sentenced on April 5, 2013. In a letter to the trial court, Mr. Nelson noted his attorney had not met with him to discuss trial strategy and that he did not feel his attorney was interviewing and properly investigating the necessary State witnesses. This concern was also voiced at a pre-trial hearing. RP 207-08; 6RP 23-24. Defense counsel Mr. Robert Quillian maintained that he discussed all trial issues with Mr. Nelson. 6RP 24-25. The trial court noted that a continuance had been previously granted so that defense counsel (Mr. Quillian) could review the discovery materials with Mr. Nelson. The trial court went on to further explain that jury selection would happen as scheduled. 6RP 25.

On the second day of trial, Mr. Nelson addressed the court stating that "he knew more about his case than his current counsel." Mr. Nelson asked to personally question the rest of the State witnesses that had been called by the State already. RP 151-156. The trial court cautioned Mr. Nelson, that asking the wrong question could be harmful to his case. RP 153.

Here, defense counsel, Mr. Quillian, failed to ask the trial court to sever the firearm charge from the robbery charge since the police did not locate the alleged firearm until 10 days after the robbery, in a home that Caitlyn Dripps testified other people were coming and going to/from frequently. RP 193-194.

The trial court sentenced Mr. Nelson to a standard range concurrent prison sentence of 108 months for the robbery and 102 months for the unlawful possession. The court also imposed a consecutive 60 month firearm enhancement. RP 12-13; CP 298-311.

C. ARGUMENT

1. MR. NELSON WAS DEPRIVED OF THE EFFECTIVE ASSISTANCE OF COUNSEL UNDER THE SIXTH AND FOURTEENTH AMENDMENTS WHEN HIS TRIAL COUNSEL FAILED TO MOVE FOR A SEVERANCE OF UNRELATED COUNTS.

The Sixth Amendment provides that "[i]n all criminal prosecutions, that accused shall enjoy the right... to have the Assistance of Counsel for his defense." U.S. Const. Amend. VI. This provision is applicable to the States through the Fourteenth Amendment. U.S. Const. Amend. XIV; Gideon v. Wainwright, 372 U.S. 335, 342, 83 S. CT. 792, 9 L.Ed.2d. 799 (1963). Likewise, Article I, Section 22 of the Washington Constitution provides, "In criminal prosecutions, the accused shall have the right to appear and defend in person, or by counsel..." Wash. Const. Article I, Section 22.

The right to counsel is "one of the most fundamental and cherished rights guaranteed by the Constitution." United States v. Salemo, 61 F.3d 214, 221-222 (3rd Cir. 1995).

An ineffective assistance claim presents a mixed question of law and fact, requiring de novo review. In Re Fleming, 142 Wn.2d 853, 865, 16 p.3d 610 (2001); State v. Horton, 136 Wn.App. 29, 146 p.3d 1227 (2006). To prevail on a claim of ineffective assistance of counsel a petitioner must prove that his counsel's performance fell below an objective standard of reasonableness and that this deficiency in his counsel's performance prejudiced him. Strickland v. Washington, 466 U.S. 668 (1984). Accord State v. Thomas, 109 Wn.2d 222, 225-26, 743 p.2d 816 (1987).

"A defendant need not show that counsel's deficient conduct more likely than not altered the outcome in the case." Strickland, 466 U.S. at 693; Thomas, 109 Wn.2d at 226. The Supreme Court reaffirmed this point in Woodford v. Visciotti, 537 U.S. 19, 22 (2002).

Deficiency Prong. There can be little doubt that trial counsel's failure to move for severance of the unlawful possession of a firearm count was deficient conduct. It is virtually impossible to think of any strategic reason why trial counsel would not want a severance of that charge. In prior cases involving claims of ineffective assistance of counsel based upon a failure to move for a severance, appellate courts have assumed that the failure to make such a motion constituted deficient conduct.

"Strickland held that to prove prejudice the defendant must establish a 'reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different,' *id.*, at 694, 80 L.Ed.2d 674, 104 S.Ct. 2052 (emphasis added); it specifically rejected the proposition that the defendant had to prove it more likely than not that the outcome would have been altered, *id.*, at 693, 80 L.Ed.2d 674, 104 S.Ct. 2052."

In the present case, the presence of the firearm count suggested that Mr. Nelson had a predisposition to commit a robbery regardless of who the alleged victim was. This evidence could only have harmed his chances of persuading a jury that he in fact took the gun from the alleged victim and never possessed one of his own.

This event occurred on October 1, 2011. The Lakewood Police Department did not recover the alleged firearm until almost ten days later at a home that had frequent traffic from multiple people including Mr. Nelson. RP 194. The police recovered a .38 caliber revolver handgun from the home of Ms. Caitlyn Dripps. RP 188-194. The alleged victim Mr. Travis Calloway testified that Mr. Nelson had a black, faded .38 revolver. RP 109-110. However, Mr. Nelson's co-defendant that became a witness for the State testified that the firearm that was branished was a chrome revolver. (See testimony of Jerako Jackson) RP 145-146.

Had Nelson's trial counsel made a motion to the court for severance, and had such motion been granted, that could only have been to Mr. Nelson's great advantage. There was no downside to making such a

motion, and the failure to make it can only be viewed as objectively unreasonable deficient conduct.

See, e.g., State v. Warren, 55 Wn.App. 645, 654, 779 p.2d 1159 (1989) ("the State suggests that counsel may have decided not to seek severance for tactical reasons....Absent any evidence in the record to support this theory, however, we decline to speculate about defense counsel's tactical intentions."); State v. Standifer, 48 Wn.App. 121, 737 p.2d 1308 (1987) ("It is unnecessary to address both parts of the Strickland test, and if it is easier to dispose of an ineffectiveness claim on the ground of lack of prejudice, then the court should do so."); People v. Kirk, 290 A.D.2d 805, 807, 736 N.Y.S.2d 778 (2002) ("we can conceive of no legitimate, strategic or tactical explanation for trial counsel's failure to move for a severance of the sex charges from the remaining counts of the indictment...").

Here, Mr. Nelson's trial counsel did not move for a motion to sever the robbery and gun counts. This deprived Nelson of a fair trial. CrR 4.3(a) permits two or more offenses, whether felonies or misdemeanors or both, to be joined in one information when the offenses are (1) of the same or similar character, even if not part of a single scheme or plan, or (2) based on the same conduct or on a series of acts connected together or constituting parts of a single scheme or plan. Improper joinder of offenses shall not preclude subsequent prosecution on the same charge for the charge improperly joined. CrR 4.3(e)

Offenses properly joined under CrR 4.3(a) should be severed if "the court determines that severance will promote a fair determination of the defendant's guilt or innocence of each offense." CrR 4.4(b). This is true even though Washington law disfavors separate trials. State v. Medina, 112 Wn.App. 40, 52, 48 p.3d 1005, review denied, 147 Wn.2d 1025 (2002)

Nelson's defense counsel's failure to motion for severance was not only manifestly prejudicial but it also outweighed the concern for judicial economy. Appellate courts have identified a number of prejudice mitigating factors which sometimes lead to the conclusion that the defendant was not prejudiced by either a failure to move for a severance, or by the denial of a severance motion. For example, the Warren opinion states that in determining whether a defendant has been prejudiced by the absence of a severance, courts should consider the following relevant factors:

- (1) the strength of the State's evidence on each count,
- (2) the clarity of defenses as to each count,
- (3) whether the trial court properly instructed the jury to consider the evidence of each crime, and
- (4) the admissibility of evidence of the other crimes.

Warren, 55 Wn.App. at 654-55.

Regarding the fourth factor, the trial court need not sever counts just because evidence is not cross-admissible. See State v. Sutherby, 165 Wn.2d 870, 884-85, 204 p.3d 916 (2009); State v. Markle, 118 Wn.2d 424, 439, 823 p.2d 1101 (1992). Although Nelson defended against the charges, the compounding effect of the charges and the denials denied Nelson a fair trial.

In order to address severance, the High Court's have first addressed the joinder issue, keeping in mind that whether [the] counts were properly joined under CrR 4.3 is a question of law subject to full appellate review. The High Court's review whether the charges were properly joined de novo. United States v. Jawara, 474 F.3d 565, 572 (9th Cir. 2007).

Joinder is concerned with the propriety of joining offenses in the charging document. The joinder rule should "be construed expansively to promote the public policy of conserving judicial and prosecutorial resources." State v. Bryant, 89 Wn. App. 857, 864, 950 P.2d 1004 (1998), review denied, 137 Wn. 2d 1017 (1999). The High Court's have determined the validity of the joinder based solely on the allegations in the charging information. Jawara, 476 F.3d at 573. "If joinder was not proper but offenses were consolidated in one trial, the convictions must be reversed unless the error is harmless." Bryant, 89 Wn. App. at 864.

Here, it cannot be concluded that the error was harmless. Mr. Nelson testified that he took the gun from the alleged victim. RP 221-222. He went on to further testify that he and Jerako Jackson ended up selling the gun five or six days later. RP 222. The police did not find the alleged gun until nine days after the robbery took place. The lead officer located a Titan Tiger .38 caliber revolver handgun in the house of Caitlyn Dripps. The State alleged that the firearm was Mr. Nelson's, mainly because it was found in Caitlyn Dripps house, whom the State alleged was Mr. Nelson's girlfriend. Testimony by Caitlyn Dripps revealed that she was NOT Mr. Nelson's girlfriend, and that at least "a couple other guys" were in her house the day the firearm was found by police. RP 193-194. RP 57.

Defense counsel objected to the firearm being introduced because the state had not laid a proper foundation. RP 59.

During cross-examination the lead officer, Martin-

testified that he did not have any personal knowledge as to whether the gun that was recovered was used in a robbery. RP 71. Further testimony from Darin Sale established that the Titan Tiger revolver that was submitted for testing had no friction ridge impressions of value for comparison purposes. In short the testing for fingerprints yeilded no findings pointing to Mr. Nelson. RP 201.

There is a strong presumption of adequate performance; however, this presumption is overcome when "there is no conceivable legitimate tactic explaining counsel's performance." State v. Reichenbach, 153 Wn.2d 126, 130, 101 p.3d 80 (2004). Any trial strategy "must be based on reasoned decision-making..." In Re Hubert, 138 Wn.App. 924, 929, 158 p.3d 1282 (2007). See, e.g., State v. Hendrickson, 129 Wn.2d 61, 78-79, 917 p.2d 563 (1996)(the state's argument that counsel "made a tactical decision by not objecting to the introduction of evidence of...prior convictions has no support in the record.")

Here, there is no legitimate or tactical reason as to why Nelson's defense counsel would not make a motion to sever the counts since their was no direct evidence linking Nelson to the firearm. The trial court did instruct the jury that it was to consider each charge separately and that it should not allow its verdict on any one count to control its verdict on any other count.

Courts have been instructed to consider whether evidence of other severed crimes would be cross-admissible in any event, at the trial of the other offenses. It is well established that it is reversible error to admit such evidence because it violates ER 404(b) which prohibits the introduction of evidence of "other crimes, wrongs, or acts" to show the bad character of the accused and to show that he acted in conformity with that bad character.

Had a motion for severance been made, it is very likely it would have been granted, for any reasonable judge would have seen that denial of severance would quite likely be held to be an abuse of discretion.

Moreover, in the present case, the Superior Court judge himself stated "I am separating the gun, because theft of the gun is not--was not, never has been the State's underlying theory. The only issue is I think, whether it differentiates the gun from the other items taken." RP 261. Had Nelson's trial counsel done a proper research into the law governing severance, he would have been familiar with these rules, and would have realized that he had a very strong argument in favor of a severance.

In sum, the failure of Nelson's trial counsel to make a motion for severance constituted deficient conduct, was highly prejudicial to the petitioner, and constituted a denial of Nelson's Sixth Amendment right to effective representation of counsel.

2. MR. NELSON'S SIXTH AND FOURTEENTH AMENDMENT RIGHTS TO EFFECTIVE ASSISTANCE OF COUNSEL AND DUE PROCESS WERE VIOLATED WHEN COUNSEL DENIED HIM THE IMPLICIT RIGHT TO CONTROL HIS DEFENSE.

The Federal and State Constitution guarantee the right to Effective Representation. The Sixth Amendment right to Effective Assistance of Counsel applies to both trial and appellate counsel. The Due Process Clause of the Fourteenth Amendment guarantees a criminal defendant the Effective Assistance of Counsel as a right. U.S. Const. Amend. VI; U.S. Const. Amend. XIV. Evitts v. Lucey, 469 U.S. 387, 396, 105 S.Ct. 830, 83 L.Ed.2d 821 (1985); Gideon v. Wainwright, 372 U.S. 335, 344, 83 S.Ct. 792, 9 L.Ed.2d 799 (1963).

The Sixth Amendment to the United States Constitution provides:

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial by an impartial jury..., and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

Under the Sixth Amendment, a criminal defendant has the implicit right to control his defense. Farretta v. California, 422 U.S. 806, 819, 95 S.Ct. 2525, 45 L.Ed.2d 562 (1975). This Court reviews constitutional violations de novo.

A defendant has received ineffective assistance of counsel when (1) Counsel's performance was deficient, and (2) The deficient representation prejudiced the defendant. Strickland v. Washington, 466 U.S. 668, 80 L.Ed.2d 674 S.Ct. 2052 (1984); State v. Thomas, 109 Wn.2d 222, 229, 743 p.3d 816 (1987); State v. Aho, 137 Wn.2d 736, 745, 975 p.2d 512 (1999).

Counsel's performance is deficient if it falls below an objective standard of reasonableness. State v. Maurice, 79 Wn.App. 544, 551-52, 903 p.2d 514 (1995). While an attorney's decisions are afforded deference, conduct for which there is no legitimate strategic or tactical reason is constitutionally inadequate. State v. McFarland, 127 Wn.2d 322, 335-36, 899 p.2d 1251 (1998).

Moreover, tactical or strategic decisions by defense counsel must still be reasonable. Reo v. Flores-Ortega, 528 U.S. 470, 481, 120 S.Ct. 1029, 145 L.Ed.2d 985 (2000); State v. Ward, 125 Wn.App. 243, 250, 104 p.3d 670 (2004). A defendant suffers prejudice where there is a "reasonable probability that, but for counsel's unprofessional errors, the result of the proceedings would have been different. A reasonable probability sufficient to undermine confidence in the outcome." Strickland 466 U.S. at 694.

In the instant case before this court Mr. Nelson argued to the trial court about his counsel's failures to properly represent him. Mr. Nelson

expressed to the trial court that his trial counsel Mr. Quillian has not been to see him to discuss trial strategy or the evidence that has been put before the jury. Mr. Nelson went on to state that the only time his trial counsel did come and see him was the day before his trial and last week to ask him to take a deal. RP 23.

Mr. Nelson expressed to the trial court that Mr. Quillian hasn't keep him informed when it comes to his case. Nelson, further stated that he has repeatedly asked Mr. Quillian to come to the jail and visit him to prepare a trial strategy as well as to show him the police video that was given by Mr. Theo Burke. RP 24.

The United States Supreme Court has defined a fair trial as a trial resulting in a verdict worthy of confidence. United States v. Severeid, 2015 U.S. App. Lexis 7642 (2015). Performance is deficient, as element of claim of ineffective assistance of counsel, if it falls below an objective standard or reasonableness. Counsel that is appointed to indigent defendants owe defendants a duty of loyalty.

Right to Counsel guaranteed by federal and state constitutions means more than just opportunity to be physically accompanied by persons privileged to practice law, but rather assistance to which defendant is entitled must be effective and unhindered either by State or by Counsel's Constitutionally deficient performance.

Here, the trial court stated to Mr. Quillian " I do think when we called the case a week ago, one of the reasons that we did set it over was because you were going to meet with him (Mr. Nelson) and show him the video. So what you are suggesting is the video is consistent with the other evidence and witness statement you had?" Mr. Quillian responded that it was consistent with the interview he had with Mr. Burke on Tuesday.

The trial court went on to further state "So that's why a week ago we set it over, so that the witness video could be shown to your client. You had some other commitments, so I anticipate even though you are saying it's consistent with what you already knew and no, it doesn't change anything, I do expect that you'll show him that sometime between today and tomorrow. Okay." RP 25-26.

Mr. Nelson expressed to the court that it is unfair to put him in a trial that he has not been properly prepared for by counsel. RP 24. Mr. Quillian stated to the court that he saw the video and that he has met with Mr. Nelson a number of times down on the second floor when he (Nelson) was there for court and that he have been to the jail to see Nelson as well. RP 24. However, there is no record to support Mr. Quillians statement to the trial court. Mr. Nelson has provided the jailhouse visit log sheet and this contradicts Mr. Quillians statements made just prior to the start of trial. (See Attachment)

The right to Counsel prevents the State from conducting trials and appeals at which persons who face incarceration must defend themselves without adequate legal assistance. U.S. Const. Amend. VI; U. S. Const. Amend. XIV. Cuyler v. Sullivan, 446 U.S. 335, 100 S.Ct. 1708, 64 L.Ed.2d 333 (1989). An attorney's performance is deficient if Counsel's Representation fell below an objective standard of reasonableness.

RPC 1.1 provides that " A lawyer shall provide competent representation to a client. Competent Representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation." Likewise, RPC 1.4 provides in part "(3) Keep the client reasonably informed about the status of the matter."

RPC 3.1 provides in part "That a lawyer for the defendant in a criminal proceeding, or the respondent in a proceeding that could result in incarceration, may nevertheless so defend the proceeding as to require that every element of the case be established.

Here, Mr. Nelson's trial counsel denied him his right to a fair trial. Although, the control in a defense aspect has been decided in cases like Lynch and Coristine this court should view it as an issue of ineffective assistance of counsel. Had Mr. Nelson's trial counsel properly prepared Nelson the outcome may have turned out differently. Prejudice is presumed as a result of actual or constructive denial of Assistance of Counsel. United States ex rel. Thomas v. O'leary, 856 F.2d 1011, 1016-17 (7th Cir. 1988).

Mr. Quillians duties entailed that he cover every meritorious avenue to try and secure a favorable decision, whether it be a Fair Trial or a fair sentence. The Sixth and Fourteenth Amendment's guarantee a defendant the right to the Effective Assistance of Counsel in all Criminal Proceedings (I.E. Pretrial, Trial, Sentencing, Appeal). U.S. Const. Amend. VI; U.S. Const. Amend. XIV.

Performance is deficient, as a element of claim of Ineffective Assistance of Counsel, if counsel's performance falls below an objective standard of reasonableness. The right to counsel guaranteed by the Federal Constitution means more than just opportunity to be physically accompanied by persons privileged to practice law, but rather Assistance to which a defendant is entitled must be Effective and unhindered either by State or by Counsel's Constitutionally Deficient Performance.

D. CONCLUSION

The cumulative error may warrant a reversal even if the court finds each error standing alone does not. State v. Weber, 141 Wn. 2d 910,929, 10 P.3d 930 (2000). The cumulative errors coupled together denied Mr. Nelson a Fair Trial and undermine the confidence in the verdict. See State v. Case, 49 Wn. 2d 66,73,298 P.2d 500 (1956).

The failure to investigate a critical source of potentially exculpatory evidence may present a case of constitutionally defective representation. United States v. Tolliver, 800 F.3d 138 (2015); See also Sanders v. Ratelle, 21 F.3d 1446, 1456 (9th Cir. 1994).

Mr. Nelson respectfully asks this court to reverse conviction and remand back to trial court for new trial.

I, Michael Nelson, declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct on this 1 day of Dec 2016, 2016.

Report Date:
12/21/2016 14:48

Pierce County Detention and Corrections Center Visit Report

Selected Parameters: Booking ID: 2011283053

Visit Date	Start/End Time	VC	VR	Cell	Booking ID	Inmate Name	Visitor Name	Visitor ID	Child	Entry Date	Entry ID
11/06/2011	09:15 / 10:15	Y	1	4NC24	2011283053	NELSON, MICHAEL ERIC	DRIPPS, CAITLIN MARIE	640253	0	11/02/2011	bblower
11/15/2011	14:00 / 15:00	N	4	2C25			MITCHELL, CLARENE	830105	1	11/11/2011	nkenen
11/16/2011	11:15 / 16:15	Y	1				PARKER, ALICIA M	879391	1	11/11/2011	nkenen
11/16/2011	17:00 / 18:00	N	4				DRIPPS, CAITLIN MARIE	640253	0	11/11/2011	mjohns1
11/26/2011	14:00 / 15:00	N	2	3C68			MITCHELL, CLARENE	3411043	1	11/19/2011	lbrown
11/26/2011	11:15 / 16:15	Y	1				PARKER, ALICIA M	879391	1	11/19/2011	lbrown
12/03/2011	11:15 / 16:15	N	4				PARKER, ALICIA M	879391	0	11/28/2011	jhansen
12/03/2011	19:30 / 20:30	N	4				AHOLA, ALYSHA LYNN	26744	0	11/28/2011	jhansen
12/03/2011	20:45 / 21:45	Y	1				MITCHELL, CLARENE	830105	0	11/28/2011	jhansen
12/10/2011	17:00 / 18:00	Y	4				PARKER, ALICIA M	879391	0	12/08/2011	jwillia
12/17/2011	11:15 / 16:15	Y	2				PARKER, ALICIA M	879391	0	12/13/2011	swoodle
12/17/2011	17:00 / 18:00	Y	2				MITCHELL, CLARENE	660906	0	12/11/2011	igorman
12/17/2011	17:00 / 18:00	Y	2				TURNER, BRITTANY	3414256	1	12/11/2011	igorman
01/01/2012	18:45 / 19:45	N	1	3EB 1			DRIPPS, CAITLIN MARIE	640253	0	12/30/2011	dlinder
01/15/2012	18:45 / 19:45	N	1				PARKER, ALICIA M	879391	1	01/10/2012	dlinder
02/18/2012	15:15 / 16:15	Y	4	3D45			MITCHELL, CLARENE	660906	2	02/13/2012	bwade
02/23/2012	19:30 / 20:30	Y	6				DRIPPS, CAITLIN MARIE	640253	0	02/20/2012	wlaneer
03/03/2012	19:30 / 20:30	N	1				DRIPPS, CAITLIN MARIE	640253	0	02/25/2012	jboyle1
03/08/2012	19:30 / 20:30	N	1				BANKS, JACQUE RAMON	1007291	0	03/03/2012	jmills1
03/08/2012	19:30 / 20:30	N	1				CARTER, MARCUS JOVON	683515	0	03/03/2012	jmills1
03/10/2012	15:15 / 16:15	N	1				BURKE, THEO ALEXANDER	1015476	0	03/06/2012	eneils
03/10/2012	15:15 / 16:15	Y	1				MITCHELL, CLARENE	660906	1	03/03/2012	jmills1
03/17/2012	15:15 / 16:15	Y	5				MITCHELL, CLARENE	830105	2	03/14/2012	wlaneer
03/17/2012	17:00 / 18:00	N	1				BALDTRIP, QUISHA	3444825	0	03/13/2012	dchung
03/22/2012	17:00 / 18:00	N	2				BAINES, BRITTENY	875349	1	03/19/2012	cgrimm
03/24/2012	15:15 / 16:15	N	2				MITCHELL, CLARENE	830105	0	03/19/2012	mtraylo
03/24/2012	15:15 / 16:15	Y	2				BAINES, BRITTANY	3355940	1	03/19/2012	mtraylo
04/05/2012	19:30 / 20:30	Y	1	3D46			DRIPPS, CAITLIN MARIE	640253	0	04/01/2012	jmills1

d_visit_report

* = Special Visit

Report Date:
12/21/2016 14.48

Pierce County Detention and Corrections Center Visit Report

Selected Parameters: Booking ID: 2011283053

Visit Date	Start/End Time	VC	VR	Cell	Booking ID	Inmate Name	Visitor Name	Visitor ID	Child	Entry Date	Entry ID
04/07/2012	15:15 / 16:15	Y	1				PARRAMORE, DEVON LAMELL	497165	0	04/07/2012	jsanche
04/07/2012	15:15 / 16:15	N	1				MITCHELL, CLARENE	830105	0	04/01/2012	jmills1
04/14/2012	15:15 / 16:15	N	5				PARRAMORE, DEVON LAMELL	497165	0	04/10/2012	mjohns1
04/14/2012	15:15 / 16:15	N	5				MITCHELL, CLARENE	830105	1	04/10/2012	mjohns1
04/14/2012	19:30 / 20:30	N	5				DRIPPS, CAITLIN MARIE	640253	0	04/11/2012	wlaneer
04/19/2012	17:00 / 18:00	N	2				PARRAMORE, DEVON LAMELL	497165	0	04/16/2012	tbrun
04/19/2012	19:30 / 20:30	N	1				DRIPPS, CAITLEN	3453165	0	04/16/2012	tbrun
04/27/2012	15:30 / 16:15			3EB10	3EB10		FINNERAN, JAMES GILBERT	864926	0	01/01/1900	
04/27/2012	15:30 / 16:30			3EB10			SHAW, CHARLES EDWARD	1012104	0	01/01/1900	
05/19/2012	09:15 / 10:15	N	1				WHITE, JASMINE J	3272433	0	05/17/2012	rmeeder
05/20/2012	18:45 / 19:45	Y	1				BAINES, BRITTNEY MARIE	872670	1	05/15/2012	jtheodo
06/12/2012	20:45 / 21:45	N	4	2C53			BAINES, BRITTANY	3355940	1	06/07/2012	djenkin
06/13/2012	12:45 / 13:45	N	4				WHITE, JASMINE J	3272433	0	06/10/2012	mwagone
06/13/2012	18:15 / 19:15	N	2				VAUGHN, DESTINY MICHELLE	883967	0	06/12/2012	pstanle
07/10/2012	15:15 / 16:15	N	4	2B33			BAINES, BRITTANY	3355940	1	07/04/2012	abautis
07/11/2012	19:30 / 20:30	N	1				DRIPPS, CAITLEN	3453165	0	07/04/2012	abautis
07/25/2012	12:45 / 13:45	N	4				PARKER, ALICIA M	879391	0	07/22/2012	pstanle
08/11/2012	17:00 / 18:00	N	6	3D 9			BELLUE, JR, FRANK SPENCER	491918	0	08/08/2012	rvancl1
08/11/2012	17:00 / 18:00	N	6				MITCHELL, CLARENE	830105	0	08/08/2012	rvancl1
08/18/2012	19:30 / 20:30	N	2	3D14			BELLUE, JR, FRANK SPENCER	491918	0	08/14/2012	cgrimm
08/18/2012	19:30 / 20:30	N	2				MITCHELL, CLAVENE	3477451	0	08/14/2012	cgrimm
10/05/2012	15:30 / 16:15			3SE 7	3SE 7		ROGERS, KEVIN ETIENNE	508528	0	01/01/1900	
10/09/2012	20:15 / 21:15	N	1				BAINES, BRITTNEY MARIE	872670	0	10/05/2012	rdavis
10/09/2012	20:15 / 21:15	Y	1				TURNER, BRITTANY	3165204	1	10/05/2012	rdavis
11/28/2012	15:30 / 16:15			3SE 7			ROGERS, KEVIN ETIENNE	508528	0	01/01/1900	
12/11/2012	20:15 / 21:15	N	1				TURNER, BRITTANY	3165204	1	12/08/2012	panton
03/25/2013	20:15 / 21:15	N	1	3NC 3			MITCHELL, CLARENE	830105	0	03/24/2013	aristin
03/25/2013	20:15 / 21:15	N	1				TURNER, BRITTANY	3414256	1	03/24/2013	aristin

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Pierce County Detention and Corrections Center Visit Report

Selected Parameters: Booking ID: 2011283053

Visit Date Start/End Time	VC	VR	Cell	Booking ID	Inmate Name	Visitor Name	Visitor ID	Child	Entry Date	Entry ID
03/25/201315:30 / 16:15		3NC 3								
03/25/201319:00 / 20:00	Y	1				ROGERS, KEVIN ETIENNE	508528	0	01/01/1900	
04/03/201319:30 / 20:30	Y	5	2C11			BYRD, MICHELLE L	490539	1	03/24/2013	aristin
04/03/201319:30 / 20:30	Y	5				MITCHELL, CLARENE	830105	0	03/29/2013	walley
						VON TRYTEK, KAYLA RAYNE	3273976	0	03/29/2013	walley