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NO. 51062-6-II

COURT OF APPEALS OF THE STATE OF WASHINGTON,

DIVISION II

STATE OF WASHINGTON,

Appellant,

vs.

TIMOTHY CARSELL KETCHUM,

Respondent.

BRIEF OF RESPONDENT

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STATEMENT OF THE CASE

By information filed June 13, 2017, the Clallam County Prosecutor charged the defendant Timothy Carsell Ketchum with one count of possession of methamphetamine a Washington State Patrol Officer found during an inventory search following an impound of the vehicle the defendant had been driving. CP 39-40. The defendant subsequently moved to suppress this evidence, arguing that the officer's failure to seek reasonable alternatives to impound vitiated the basis for the search. CP 31-38. The court later held a hearing on this motion, during which the state called the Trooper who had performed the search. RP 1-91.

Following the Trooper's testimony and argument by counsel, the court took the motion under advisement. RP 81. The court later entered the following written memorandum decision granting the motion:

> This matter was before the court September 14, 2017, for Mr. Ketchum's suppression motion. Defendant was represented by Loren D. Oakley, Attorney at Law. Plaintiff was represented by Jesse Espinoza, Deputy Prosecuting Attorney. The court took the matter under advisement and now issues this opinion.
>
> The evidence presented establishes that on March 12, 2016, Mr. Ketchum was stopped by the WSP for speeding. The trooper determined Ketchum was driving while his license was suspended and that he had five active warrants for charges that included driving with license suspended in the third degree. Ketchum said the vehicle was not his, but was owned by his girlfriend who lives in Port Orchard.

Mr. Ketchum was placed under arrest for DWLS-3 and for a local warrant. The trooper told Ketchum he had to impound his vehicle because he was driving with license suspended and had warrants for driving with license suspended. While conducting an inventory for impound, the office secured, among other things, four quart sized bags of apparent marijuana found in plain view. Also located was a small bag containing a white crystal substance suspected to be methamphetamine.

The vehicle Mr. Ketchum was driving was located off of the traveled portion of the road. The trooper testified he had no reasonable alternatives to impounding the vehicle, since it would have been unsafe to leave the vehicle where it was due to hazardous road conditions and it would have been unsafe for the officers to attempt to move the vehicle. The trooper testified that it was WSP policy to impound under these circumstances. Further, the trooper did not think Mr. Ketchum lived in the area.

The trooper did not ask Mr. Ketchum if another driver was available to drive the vehicle and did not inquire about where Mr. Ketchum currently lived.

The court notes many similarities between this case and the situation described in Division 2 of the Court of Appeal's recent case, *State v. Froehlich*, 197 Wn.App. 831, 391 P.3d 559 (2017). Ms. Froehlich was involved in a collision. She was not the owner of the vehicle. The officer had some interactions with Froehlich, but did not ask her what she wanted to do with the car or inquire about her ability to arrange for the car's removal before she was taken by ambulance to the hospital.

The trooper in *Froehlich* included the vehicle, while not obstructing traffic, presented a traffic hazard. He believed it would be impossible to move the car without a tow truck and he could no secure the vehicle in its current location.

Based upon these concerns, the trooper in *Froehlich* decided to impound Froehlich's vehicle. He made this decision without asking Froehlich what she wanted to happen to the car or discussing

alternatives to impound with her.

During an inventory of the vehicle, the trooper located a bag of white powder he suspected was methamphetamine. Froehlich moved to suppress the methamphetamine.

The trial court ruled that the trooper did not lawfully impound the vehicle as part of his community caretaking function because he did not ask Froehlich about her ability to arrange for the removal of her car.

The court of appeal affirmed the trial court's suppression of the methamphetamine, noting that the stat[e] has the burden of establishing an exception to warrant requirement for a noninvestigatory, good faith inventory search of an impounded vehicle. But even if one of these reasons existed, an officer may impound a vehicle only if there are not reasonable alternatives. Therefore, the court reasoned, the trooper must consider alternatives to impoundment, including whether the defendant can make arrangements for someone to remove the vehicle, before impounding it.

In *Froehlich*, the state, citing *State v. Peterson*, 92 Wn.App. 899, 965 P.2d 1231 (1998), suggests, as it does in the present case, that the trooper wasn't required to ask Froehlich about removing the car because she did not own the car and the trooper had no duty to seek out the registered owner.

The *Froehlich* court distinguished *Peterson* by noting that it involved an officer's *statutory* authority to impound a vehicle when the driver had a suspended license and the owner was not at the scene, not the community caretaking function. As such, "... the State was not required to establish, as here, that the driver's spouse and friends were not available to move the vehicle." *Froehlich*, 197 Wn.App. at 565.

Here the record does not establish that the trooper considered alternatives to impoundment, since he did not ask Mr. Ketchum about the availability of anyone he might know who could move the vehicle. While an officer does not have to exhaust all possible alternatives to

> impoundment, *Froehlich* establishes that under these circumstances there must at least be some inquiry into whether the driver can make arrangements for someone to remove the vehicle.
>
> Based upon the foregoing, the court suppresses the evidence in question.

CP 12-15.

The court later entered another order finding that the "court's order suppressing the State's evidence filed Sept. 26, 2017 has the practical effect of terminating the case." CP 10. The state subsequently filed a timely notice of appeal. CP 5-10.

ARGUMENT

I. THE STATE'S FAILURE TO ASSIGN ERROR TO ANY OF THE FACTUAL FINDINGS IN THE TRIAL COURT'S WRITTEN MEMORANDUM OPINION MAKES THOSE FACTUAL FINDINGS VERITIES ON APPEAL.

The purpose of findings of fact and conclusions of law is to aid an appellate court on review. *State v. Agee*, 89 Wn.2d 416, 573 P.2d 355 (1977). The Court of Appeals reviews these findings under the substantial evidence rule. *State v. Nelson*, 89 Wn.App. 179, 948 P.2d 1314 (1997). Under the substantial evidence rule, the reviewing court will sustain the trier of facts' findings "if the record contains evidence of sufficient quantity to persuade a fair-minded, rational person of the truth of the declared premise." *State v. Ford*, 110 Wn.2d 827, 755 P.2d 806 (1988). In making this determination, the reviewing court will not revisit issues of credibility, which lie within the unique province of the trier of fact. *Id.* Finally, findings of fact are considered verities on appeal absent a specific assignment of error. *State v. Hill*, 123 Wn.2d 641, 870 P.2d 313 (1994).

In the case at bar the trial court entered a memorandum decision which included the following findings of fact:

> . . .
>
> The evidence presented establishes that on March 12, 2016, Mr. Ketchum was stopped by the WSP for speeding. The trooper determined Ketchum was driving while his license was suspended and

that he had five active warrants for charge that included driving with license suspended in the third degree. Ketchum said the vehicle was not his, but was owned by his girlfriend who lives in Port Orchard.

Mr. Ketchum was placed under arrest for DWLS-3 and for a local warrant. The trooper told Ketchum he had to impound his vehicle because he was driving with license suspended and had warrants for driving with license suspended. While conducting an inventory for impound, the office secured, among other things, four quart sized bags of apparent marijuana found in plain view. Also located was a small bag containing a white crystal substance suspected to be methamphetamine.

The vehicle Mr. Ketchum was driving was located off of the traveled portion of the road. The trooper testified he had no reasonable alternatives to impounding the vehicle, since it would have been unsafe to leave the vehicle where it was due to hazardous road conditions and it would have been unsafe for the officers to attempt to move the vehicle. The trooper testified that it was WSP policy to impound under these circumstances. Further, the trooper did not think Mr. Ketchum lived in the area.

The trooper did not ask Mr. Ketchum if another driver was available to drive the vehicle and did not inquire about where Mr. Ketchum currently lived.

. . .

Here the record does not establish that the trooper considered alternatives to impoundment, since he did not ask Mr. Ketchum about the availability of anyone he might know who could move the vehicle.

. . .

CP 12-15.

Appellant's failure to assign error to any of these written findings of fact makes those findings verities on appeal.

II. SUBSTANTIAL EVIDENCE SUPPORTS THE TRIAL COURT'S FACTUAL FINDINGS.

As was mentioned in the preceding argument, appellate courts review challenged findings of fact under the substantial evidence rule. *State v. Nelson, supra.* Under this rule, the reviewing court will sustain the trier of facts' findings "if the record contains evidence of sufficient quantity to persuade a fair-minded, rational person of the truth of the declared premise." *State v. Ford, supra.* In applying this rule the appellate court does not reevaluate the trial court's determination on credibility. *Id.*

In this case the prosecutor argued that "[t]he trial court erred in its finding that Trooper Allen did not consider alternatives to impoundment of the vehicle." In fact, a review of the Trooper's testimony at the suppression motion does not support this claim. In this case the Trooper decided to impound the vehicle based upon the Washington State Patrol's policy to impound all vehicle's driven by a suspended driver. The trooper testified:

> Q. What kind of authority does the policy give you to impound?
>
> A. Under that particular policy, with the matrix that's provided and I believe I've provided you with a copy of that matrix out of the policy manual, it depends on the level of suspension the person is under at the time and if there's prior offenses. In Mr. Ketchum's scenario that day, he was DWLS third, with prior convictions of DWLS third, so it's kind of a low level habitual situation, so that give the state patrol authority to take that vehicle and impound it for 30 days. It doesn't mean that the owner of the vehicle can't petition to get the vehicle

back, but that's the authority at the scene, under that matrix.

Q. Okay and does that policy give you anything to consider?

A. No, actually it's just plainly stated. That's just the policy. It doesn't go into other alternatives at that point. There are other areas where the policy manual does discuss alternatives and leading up to that, so and of course those were already discussed.

RP 27-28.

In the case at bar the trial court was well within its discretion to find from this testimony that the Trooper impounded the vehicle the defendant was driving on the basis of WSP policy without considering alternatives to that impound. Thus, substantial evidence supports the trial court's finding that the Trooper "did not consider alternatives to impoundment of the vehicle."

III. THE TRIAL COURT DID NOT ERR WHEN IT FOUND THAT THE TROOPER'S FAILURE TO CONSIDER ALTERNATIVES TO IMPOUND VITIATED THE SEARCH.

In this case the state argues that the trial court erred when it granted the motion to suppress in reliance upon the decision in *State v. Froehlich,* 197 Wn.App. 831, 391 P.3d 559 (2017), instead of denying the motion under the holding in *State v. Peterson*, 92 Wn.App. 899, 964 P.2d 1231 (1998). Specifically, the state argued that since the Trooper in this case impounded the vehicle pursuant to statutory authority applicable because

the defendant was driving while suspended as did the officer in *Peterson*, there was no requirement in the case at bar that the Trooper pursue reasonable alternatives to the impound as required under *Froehlich*. In fact, this argument was addressed and rejected in *Froehlich,* which opinion relied upon the Washington State Supreme Court's 2013 opinion in *State v. Tyler*, 177 Wn.2d 690, 302 P.3d 165 (2013).

In *Froehlich*, the court recognized that officers must also consider alternatives to impound in all situations, even when the vehicle is seized pursuant to statutory authority. The court noted:

> One exception to the warrant requirement is a non-investigatory, good faith inventory search of an impounded vehicle. However, an inventory search of an impounded vehicle is lawful only if the officer lawfully impounded the vehicle. The State has the burden of establishing this exception.
>
> Law enforcement may lawfully impound a vehicle for three reasons: (1) as evidence of a crime, (2) under the community caretaking function, or (3) when the driver has committed a "traffic offense for which the legislature has expressly authorized impoundment." Id.
>
> But even if one of these reasons exists, an officer may impound a vehicle only if there are no reasonable alternatives."[I]f ... a reasonable alternative to impoundment exists, then it is unreasonable to impound a citizen's vehicle." Therefore, an officer must consider alternatives to impoundment, although the officer "does not have to exhaust all possible alternatives." Considering reasonable alternatives may include obtaining a name from the driver of someone in the vicinity who could move the vehicle. Whether an impoundment is reasonable depends on the facts of each case.

State v. Froehlich, 197 Wn.App. at 837–38 (citations omitted).

In *Froehlich*, the court went on to specifically reject the state's claim that the officer did not need to pursue alternatives to impound because he had statutory authority for the seizure of the vehicle. The court held:

> The State argues that even if impoundment was improper under the community caretaking function, [the officer] had statutory authority under RCW 46.55.113 for impounding Froehlich's car because it was unattended. We agree. But we hold that despite the statutory authority, the impoundment of Froehlich's car was unlawful under *Tyler* because Richardson did not consider reasonable alternatives.

State v. Froehlich, 197 Wn.App. at 841.

Similarly, in the case at bar, the state's argument that the Trooper did not need to seek alternatives to impound because he had statutory authority for the impound also fails.

IV. THE TROOPER'S FAILURE TO GIVE THE DEFENDANT OR THE VEHICLE OWNER THE OPTION OF WAIVING CIVIL CLAIMS AS AN ALTERNATIVE TO AN INVENTORY SEARCH ALSO SUPPORTS THE TRIAL COURT'S DECISION TO SUPPRESS IN THIS CASE.

Although the Court of Appeals generally will not reverse a conviction based upon an argument the non-prevailing party failed to make before the trial court, the Court of Appeals can and will affirm a trial court's ruling based upon any alternative legal theory supported by the facts and the record even if not argued below. *State v. Sondergaard*, 86 Wn.App. 656, 938 P.2d 351 (1997); *State v. Vanderpool*, 145 Wn.App. 81, 184 P.3d 1282

(2008). Thus, in the case at bar, this court is free to affirm the trial court on any argument available, even if not made by the prevailing party. As the following explains, there is an alternate basis to sustain the trial court's order to suppress not argued to the trial court. This argument is that absent the officer first giving either the defendant or the owner of the vehicle the option of waiving a claim against the state, there is no legal basis to perform an inventory search even if there is a basis to impound the vehicle. The following presents this argument.

Under Washington Constitution, Article 1, § 7, and United States Constitution, Fourth Amendment, warrantless searches are per se unreasonable. *State v. Simpson*, 95 Wn.2d 170, 622 P.2d 1199 (1980). As such, the courts of this state will suppress the evidence seized as a fruit of that warrantless detention unless the prosecution meets it burden of proving that the search falls within one of the various "jealously and carefully drawn" exceptions to the warrant requirement. R. Utter, Survey of Washington Search and Seizure Law: 1988 Update, 11 U.P.S. Law Review 411, 529 (1988).

One recognized exception to the warrant requirement holds that the police may inventory the items in a defendant's possession at the time of his arrest, including items contained in an impounded automobile in order

to protect that property from theft and protect the police from false claims of liability. *State v. Montague,* 73 Wn.2d 381, 438 P.2d 571 (1968). The justification for this exception is that an "inventory of property" is part of a community caretaking function for the police, and not a "search for evidence." In *Montague*, the court stated this proposition as follows:

> When ... the facts indicate a lawful arrest, followed by an inventory of the contents of the automobile preparatory to or following the impoundment of the car, and there is found to be reasonable and proper justification for such impoundment, and where the search is not made as a general exploratory search for the purpose of finding evidence of crime but is made for the justifiable purpose of finding, listing, and securing from loss, during the arrested person's detention, property belonging to him, then we have no hesitancy in declaring such inventory reasonable and lawful, and evidence of crime found will not be suppressed.

State v. Montague, 73 Wn.2d at 385.

However, in *Montague*, the court recognized the potential for abuse when the police performed an inventory search as a pretext to find evidence of a crime. In these circumstances, the courts should suppress, even though there was an ostensibly valid reason to inventory. In *Montague*, the court stated as follows on this proposition:

> (n)either would this court have any hesitancy in suppressing evidence of crime found during the taking of the inventory, if we found that either the arrest or the impoundment of the vehicle was resorted to as a device and pretext for making a general exploratory search of the car without a search warrant.

State v. Montague, 73 Wn.2d at 385.

One of the determinative factors the courts consider when judging whether or not the police have used an inventory as a pretext to search is the extent the officers have gone to seek lesser intrusive alternatives to the search which would address the needs underlying the inventory while still preserving the defendant's right to privacy. *See i.e. State v. Hill, supra* (inventory pursuant to impound absent showing that officer pursued lesser intrusive alternative such as leaving the vehicle or allowing another person to take it violated the defendant's right to privacy); *State v. Hardman*, 17 Wn.App. 910, 914, 567 P.2d 238 (1977) (although police need not exhaust all possible alternatives before impounding a vehicle, they must show they "at least thought about alternatives; attempted, if feasible, to get from the driver the name of someone in the vicinity who could move the vehicle, and then reasonably concluded from [their] deliberation that impoundment was in order."); *State v. Houser*, 95 Wn.2d 143, 153, 622 P.2d 1218 (1980) ("It is unreasonable to impound a citizen's vehicle . . . where a reasonable alternative to impoundment exists.")

One of the reasonable alternatives that the police should explore is to offer to allow the defendant to sign a waiver of liability releasing the police from any claims arising from a failure to inventory. In *State v. Sweet*, 44

Wn.App. 226, 721 P.2d 560 (1986), another vehicle impound case, the court noted this as a reasonable alternative, unless the defendant is not in a position to execute such a waiver. The court stated as follows on this issue:

> Impoundment as part of the police "community caretaking function" is proper if the vehicle is threatened by theft of its contents and neither the defendant nor acquaintances are available to move the vehicle. In the instant case, officers were unable to arouse Sweet either to have him sign a waiver of liability or to give alternative instructions for disposition of the vehicle. Officers were able to look through the windows of the truck canopy and observe numerous items of potential value, including tools, in the truck bed. Consequently, even if officers had locked the canopy, the potential for theft remained.

State v. Sweet, 44 Wn.App. at 236 (citations omitted) (emphasis added).

In the case at bar the officer did not give either the defendant or the owner of the vehicle the opportunity to waive any claims against the state in return for refraining to perform an inventory search. Thus, in this case, even if the impoundment was valid, the inventory search was not. As a result, this court should affirm the decision of the trial court to grant the motion to suppress.

V. THE DEFENDANT HAD AUTOMATIC STANDING TO ARGUE FROM THE VIOLATION OF THE VEHICLE OWNER'S RIGHTS UNDER WASHINGTON CONSTITUTION, ARTICLE 1, § 7.

In the case at bar the state argues that "[a]lthough there may be automatic standing to raise the challenge, Ketchum may not benefit from

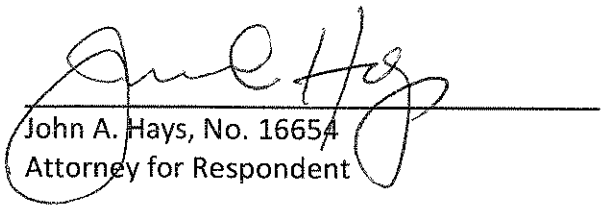
the exclusionary rule because his rights were not violated by the search of someone else' vehicle which he wrongfully possessed. Therefore this Court should reverse the trial court's decision suppressing the evidence." Brief of Appellant, page 18. This argument fails because the trial court did not enter a finding that the defendant had wrongfully possessed the vehicle. Although the Trooper had testified that the owner of the vehicle had at one point made a claim that the defendant, who was her boyfriend or soon to be ex-boyfriend, did not have permission to drive the vehicle, the Trooper did not testify that he believed this claim. In fact, he did not arrest the defendant for either taking the motor vehicle without permission or for possession of a stolen vehicle and no such charge has ever been brought against the defendant. Thus, in this case, the defendant had automatic standing to contest the officer's violations of the vehicle owner's privacy interests in the vehicle.

CONCLUSION

The trial court did not err when it granted the defendant's motion to suppress evidence. As a result this court should affirm the trial court's suppression order.

DATED this 5th day of April, 2018.

Respectfully submitted,



John A. Hays, No. 16654
Attorney for Respondent

APPENDIX

WASHINGTON CONSTITUTION
ARTICLE 1, § 7

No person shall be disturbed in his private affairs, or his home invaded, without authority of law.

UNITED STATES CONSTITUTION,
FOURTH AMENDMENT

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons and things to be seized.

COURT OF APPEALS OF WASHINGTON, DIVISION II

STATE OF WASHINGTON, **Respondent,** **vs.** **TIMOTHY C. KETCHUM,** **Appellant.**	**No. 510626-II** **AFFIRMATION OF SERVICE**

The under signed states the following under penalty of perjury under the laws of Washington State. On the date below, I personally e-filed and/or placed in the United States Mail the Brief of Appellant with this Affirmation of Service Attached with postage paid to the indicated parties:

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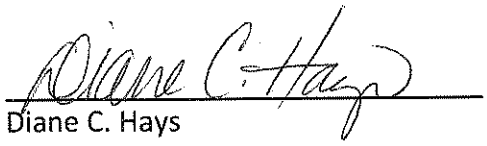
Dated this 5th day of April, 2018, at Longview, WA.



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