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NO. 52251-9-II

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

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STATE OF WASHINGTON,  
Respondent,

v.

JOSEPH ALLEN JONES,  
Appellant.

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APPEAL FROM THE SUPERIOR COURT OF THE STATE  
OF WASHINGTON FOR GRAYS HARBOR COUNTY

---

THE HONORABLE DAVID L. EDWARDS, JUDGE

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BRIEF OF RESPONDENT

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**T A B L E S**

TABLE OF CONTENTS

**RESPONSE TO ASSIGNMENTS OF ERROR ..... 1**

**RESPONDENT’S COUNTER STATEMENT OF THE CASE..... 1**

**ARGUMENT..... 1**

**1. The motion for a mistrial was properly denied because the jury  
venire was not irrevocably tainted. .... 1**

**This court should review the denial of the motion for a  
mistrial. .... 1**

**Motions for mistrials are within the sound discretion of the  
trial court. .... 2**

**The record does not support an inference the *venire* was  
tainted..... 2**

**A mistrial may be properly denied when evidence of prior  
crimes is introduced at trial. .... 5**

***Strange* is inapposite, but *Mach* is instructive. .... 11**

**That the jury expressed hostility towards drugs is not a reason  
for reversal..... 13**

**There was no structural error. .... 14**

**Conclusion. .... 15**

**2. The trial court properly balanced the probity of the  
Defendant’s prior convictions against the prejudice, and did  
not abuse discretion by admitting the evidence. .... 15**

**Standard of review..... 16**

**The trial court properly balanced the probative nature of the  
conviction against the prejudicial value..... 16**

**An Unlawful Possession of a Firearm conviction raises  
concerns about a witnesses ability to be truthful. .... 19**

**Evidence of the Defendant’s prior conviction was essential to  
give the jury an accurate view of the situation..... 20**

**3. There was no cumulative error..... 21**

**CONCLUSION ..... 22**

TABLE OF AUTHORITIES

**Cases**

*Feis v. King Cty. Sheriff's Dep't*, 165 Wn. App. 525, 267 P.3d 1022 (2011) ..... 4

*Mach v. Stewart*, 137 F.3d 630 (9th Cir.1997) ..... 11, 12, 13, 15

*State v. Garcia*, 177 Wn.App. 769, 313 P.3d 422 (2013)..... 6

*State v. Gonzales*, 83 Wn. App. 587, 922 P.2d 210 (1996). ..... 17

*State v. Hardy*, 133 Wn.2d 701, 946 P.2d 1175 (1997)..... 18

*State v. Hopson*, 113 Wn.2d 273, 778 P.2d 1014 (1989)... 2, 3, 5, 6, 10, 11, 16

*State v. Millante*, 80 Wn.App 237, 908 P.2d 374 (1995)..... 21

*State v. Norlin*, 134 Wn.2d 570, 951 P.2d 1131 (1998)..... 16

*State v. Persinger*, 62 Wn.2d 362, 382 P.2d 497, 500 (1963) ..... 3

*State v. Strange*, 188 Wn. App. 679, 686, 354 P.3d 917, 921 (2015). 11, 12

*Tennant v. Roys*, 44 Wn. App. 305, 722 P.2d 848 (1986) ..... 10

*U.S. v. Iribe-Perez*, 129 F.3d 1167 (10th Cir. 1997)..... 14, 15

*Willie v. Maggio*, 737 F.2d 1372 (5<sup>th</sup> Cir. 1984)..... 4, 5

**Rules**

ER 609 ..... 17

## RESPONSE TO ASSIGNMENTS OF ERROR

1. **The trial court properly exercised its discretion to deny the Defendant's motion for a mistrial.**
2. **The trial court properly admitted evidence of the Defendant's prior conviction for impeachment purposes pursuant to ER 609 and *State v. Alexis*.**
3. **There was no cumulative error.**

## RESPONDENT'S COUNTER STATEMENT OF THE CASE

The State is satisfied by the Defendant's statement of the case.

## ARGUMENT

1. **The motion for a mistrial was properly denied because the jury venire was not irrevocably tainted.**

The Defendant first claims his right to an impartial jury was violated because of a comment by a prospective juror during *voir dire*. Although the comment led to a motion for a mistrial, which was denied, the Defendant asserts a "tainted *venire* claim," rather than a review of the denial of the motion for mistrial. But because the comment was fleeting and not specific, the court properly denied the motion

**This court should review the denial of the motion for a mistrial.**

The Defendant asks this court to review this case for what he calls a "tainted *venire* claim." Brief of Appellant at 11. The Defendant invites

this court to declare that such a claim should be reviewed as a mixed question of law and fact. Brief of Appellant at 13. However, the Defendant moved for a mistrial after *voir dire*, claiming that the jury had been tainted. RP at 29. This is the same issue he raises here, and that motion preserved the issue for appeal. Therefore, this court should review the trial court's denial of the motion for a mistrial.

**Motions for mistrials are within the sound discretion of the trial court.**

Appellate courts review a trial court's denial of a motion for mistrial under an abuse of discretion standard. *State v. Hopson*, 113 Wn.2d 273, 284, 778 P.2d 1014, 1019 (1989) (citing *State v. Mak*, 105 Wn.2d 692, 701, 719, 718 P.2d 407, *cert. denied*, *Mak v. Washington*, 479 U.S. 995, 107 S.Ct. 599, 93 L.Ed.2d 599 (1986), *overruled on other grounds by State v. Hill*, 123 Wn.2d 641, 870 P.2d 313 (1994).) An abuse of discretion only occurs when no reasonable judge would have reached the same conclusion. *Id.* (citing *Sofie v. Fibreboard Corp.*, 112 Wn.2d 636, 667, 771 P.2d 711 (1989).)

**The record does not support an inference the venire was tainted.**

The Defendant argues that the jury *venire* must have been irrevocably tainted because juror #33's disclosure of the "past life" when he knew the Defendant must have convinced all the other jurors that the

Defendant was guilty in this case. However, 1) not all the empaneled jurors heard Juror #33's statement; and 2) as the Defendant concedes, the empaneled jurors who did hear the statement said it would not affect their impartiality. *See* Brief of Appellant at 6-7.

The Defendant essentially argues that this court should assume that Juror #33's vague admission was so powerful that it overwhelmed the higher cognitive functions of these jurors to the extent that they could not help themselves, and could not follow the oath they took to be fair and impartial. However, it is a longstanding presumption that "each juror sworn in a case is impartial and above legal exception[.]" *State v. Persinger*, 62 Wn.2d 362, 366, 382 P.2d 497, 500 (1963) (citing *People v. Roxborough*, 307 Mich. 575, 12 N.W.2d 466 (1943) and *Hall v. United States*, 83 U.S.App. D.C. 166, 168 F.2d 161, 4 A.L.R.2d 1193 (1948).)

To support his argument, the Appellant cites to a passage in the Fifth federal circuit case *Willie v. Maggio*, 737 F.2d 1372 (5<sup>th</sup> Cir. 1984).<sup>1</sup> However, the holding of *Willie* does not support the Defendant's argument.

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<sup>1</sup> The Defendant appears to use this case for persuasive authority, as federal circuit court decisions, although "entitled to great weight," are not binding on this court. *Feis v. King Cty. Sheriff's Dep't*, 165 Wn. App. 525, 547, 267 P.3d 1022, 1034 (2011) (citing *Home Ins. Co. of New York v. N. Pac. Ry. Co.*, 18 Wn.2d 798, 808, 140 P.2d 507 (1943).)

In *Willie*, the defendant and one Vaccaro were both charged with the rape and murder of a young woman. *Willie* at 1376. The trials were severed, but held simultaneously in the same courthouse. *Id.* at 1377. After *voir dire* in Vaccaro's case, some members of the *venire* were sent to join the *venire* in Willie's courtroom. *Id.* Those jurors had heard Vaccaro's defense attorney's theory of the case; that Vaccaro had been befuddled by strong drink or drugs, and after the rape was duped into innocently holding the victim's hands when Willie suddenly and unexpectedly killed her. *Id.* at 1378.

Four former members of Vaccaro's *venire* who had heard that theory ended up serving on the jury that convicted Willie. *Id.* In his petition for relief to the Fifth Circuit, Willie argued that those jurors should have been presumed to have been prejudiced against him, and therefore he was denied a constitutionally fair trial. *Id.* at 1378-79.

The Fifth Circuit ultimately denied the defendant's motion for relief, stating they would "not readily presume that a juror is biased solely on the basis that he or she has been exposed to prejudicial information about the defendant outside the courtroom."<sup>2</sup> *Willie* at 1379.

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<sup>2</sup> Although the allegedly prejudicial information in the instant case was in the courtroom, that distinction would appear to be irrelevant.

*Willie* does not stand for the proposition that a court should presume that a juror must be subconsciously biased by the slightest suggestion a defendant is not an unblemished angel. Neither does Washington law.<sup>3</sup>

**A mistrial may be properly denied when evidence of prior crimes is introduced at trial.**

Depending on the context, a trial court may properly deny a motion for a mistrial when evidence of a defendant's past crimes surfaces. *State v. Hopson*, 113 Wn.2d 273, 285, 778 P.2d 1014, 1020 (1989). To determine if the motion for a mistrial was properly denied, appellate courts use what is now called the *Hopson* factors. *State v. Garcia*, 177 Wn.App. 769, 776, 313 P.3d 422 (2013) (citing *State v. Emery*, 174 Wn.2d 741, 765, 278 P.3d 653 (2012).)

The *Hopson* factors are: (1) the seriousness of the prior misconduct; (2) whether the evidence was cumulative; and (3) whether the court instructed the jury to disregard the evidence. *Id.*

Because the trial court is in the best position to determine if prejudice occurred, appellate courts consider the *Hopson* factors with deference to the trial court's decision. *Id.* (citing *State v. Perez-Valdez*,

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<sup>3</sup> The State assumes the Defendant concedes that the right to an impartial jury conferred by the Washington State is coextensive with the analogous federal right.

172 Wn.2d 808, 818, 265 P.3d 853 (2011) and *State v. Lewis*, 130 Wn.2d 700, 707, 927 P.2d 235 (1996).) In this case, of course, the trial court denied the motion for a mistrial.

Although the *Hopson* factors are typically used when evidence of a specific bad act is introduced into evidence, which is not the case here, the analysis is instructive. Additionally, the Defendant uses this same analysis, but comes to the opposite conclusion.

The seriousness of the prior misconduct here is indistinct and low.

In this case the seriousness is low because the jury were not really exposed to any specific information about the Defendant. In *Hopson*, where the jury learned that the defendant had previously been in the penitentiary. *Hopson* at 276. In *Garcia, supra*, the jury were informed that the defendant had previously been convicted of Robbery in the First Degree. *Garcia* at 775-76. In both these cases the evidence was of a conviction for a prior bad act, potentially running afoul of ER 404(b). Both *Hopson* and *Garcia* affirmed the decision of the trial court to deny the mistrial.

Compare these specific instances of misconduct to the instant case, where Juror #33 actually admitted to *his own* misconduct (i.e. past drug use) and said he knew the Defendant during this time. From this

admission, the jury could reasonably conclude that the Defendant affiliated himself with drug users at some point in the indeterminate past, and was therefore perhaps a drug user himself during that time, but little else.

The Defendant asks this court to come to the opposite conclusion and assume that the other jurors must have come to the conclusion that the Defendant was Juror #33's drug dealer. Brief of Appellant at 21.

That is highly speculative. The other jurors may have realized that making those assumptions about the Defendant is just as unwarranted as making assumptions about Juror #33 himself, who may have been addicted to drugs in the past, but is now apparently responsible enough to respond to a jury summons and forthright enough make embarrassing admissions in front of strangers. Making such an assumption is no less speculative than assuming what the Defendant wants this court to believe.

Because Juror #33's information about prior misconduct, to any extent the information can even be termed misconduct, was not serious, the first factor leans towards upholding the trial court's denial of the motion.

The evidence was cumulative.

Any assumptions the jury might have made from Juror #33's admission was cumulative, as the entire case involved the Defendant being in a car with an admitted drug addict, namely Drew McGuire, the driver of the vehicle.

McGuire admitted to being a drug addict and under the influence of heroin at the time he and the Defendant were stopped by police. RP 12/12/17 at 71. The jury knew the police were looking for McGuire because they believed he was armed, and that he was avoiding the police. RP at 80. No fewer than four police officers responded to the stop. RP at 87. The uncontested evidence was that the Defendant was in a car with a backpack full of illegal narcotics; it was just a matter of who possessed them. *Id.*

Such evidence continued during the Defendant's case-in-chief. The Defendant himself admitted on the stand that he had been addicted to drugs, and that he wouldn't have been around McGuire if he hadn't been involved in the "drug life." RP at 150.

Juror #33's admission essentially amounts to evidence that the Defendant consorts with drug users. At trial, the uncontested evidence was that the Defendant was consorting with a drug user. Therefore, what

Juror #33 said in *voir dire* was cumulative and the second *Hopson* factor also favors upholding the trial court.

The court instructed the jurors not to give consideration to the remark.

As the Defendant concedes in his brief, the judge addressed the comment with the jury early on. After Juror #33's admission, the trial court told the *venire* that they would take an oath to decide the case based only on the evidence presented. Brief of Appellant at 6 & RP 12/12/17 at 51-53. The court admonished the entire *venire* that,

[T]he comment made by the juror who was excused is not something that you should give any consideration to. You don't know whether it's true or not true. You know very little about what his assertion was, because it was very brief, and I cut him off and excused him. So, you really had very little upon which to base any kind of opinion regarding the statement made by that juror.

RP Vol. I at 52. And, of course, the jury were instructed at the close of the case that the only evidence they were to consider was "the testimony that you have heard from witnesses, stipulations, and the exhibits..." CP at 16.

Jurors are presumed to follow their instructions, and that presumption prevails in the absence of evidence to the contrary. *Tennant v. Roys*, 44 Wn. App. 305, 315, 722 P.2d 848, 854 (1986) (citing *In re*

*Municipality of Metropolitan Seattle v. Kenmore Properties, Inc.*, 67 Wash.2d 923, 930–31, 410 P.2d 790 (1966).) Because the jury were properly instructed that they should disregard Juror #33's comment, the third *Hopson* factor also weighs toward upholding the trial court.

Not all the seated jurors heard the remark.

In addition to the three *Hopson* factors, there is an additional mitigating fact in this case; as the Defendant concedes, only 9 of 12 jurors seated even heard juror #33's remark. Brief of Appellant at 16. To believe that the final panel was inherently biased is to believe that the jurors who did hear the remark a) disregarded their instructions; and b) convinced the jurors who did not hear the remark that they too should disregard their instructions and vote to convict based upon something they did not hear. This proposition requires too great of a leap. This court should not engage in such wild speculation and instead uphold the trial court.

The Hopson factors do not call for a reversal.

The *Hopson* factors, to the extent they are applicable here, indicate that the Defendant's motion for a mistrial was properly denied. The nine jurors who heard what Juror #33 did not learn of any crimes or specific instances of misconduct. What they did hear would only have lead them

to assumptions that were cumulative given the evidence adduced at trial. And then, the court instructed them not to take it into account, which they presumably did. This court should uphold the denial of the motion for a mistrial.

***Strange* is inapposite, but *Mach* is instructive.**

The Defendant cites to *State v. Strange*, 188 Wn. App. 679, 686, 354 P.3d 917, 921 (2015) for the proposition that this court should review *de novo* the question of whether the Defendant had an impartial jury. *Strange* is substantively dissimilar to the case at bar. However, *Mach v. Stewart*, 137 F.3d 630 (9th Cir.1997), on which the defendant in *Strange* relied, is instructive.

In *Strange*, the defendant was charged with child molestation and voyeurism. *Strange* at 681. During *voir dire* a prospective juror, who admitted he did not have much experience with such matters, expressed an opinion that such an accusation would not have been made for no reason, and that if such an accusation had been made, then that juror would believe that something had happened.<sup>4</sup> *Id* at 682.

Citing to *Mach v. Stewart*, the defendant claimed on appeal that his right to a fair trial by an impartial jury was violated because the entire jury

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<sup>4</sup> That juror was excused for unrelated hardship reasons and was not seated. *Strange* at 682.

*venire* must have been tainted by the prospective juror's remark. *Id.* at 685. This court disagreed that the case was factually similar to *Mach*, and upheld the conviction. *Id.* at 686-87.

In *Mach*, the defendant was also charged with a sex offense with a minor. *Mach* at 631. During *Mach*'s *voir dire* a prospective juror who was a social worker stated she would have a difficult time being impartial because of her line of work, and because sexual assault had been confirmed in every case she had dealt with where an accusation had been made. *Id.* at 632. The trial court questioned the prospective juror, and elicited more statements about her education, experience, and belief that children do not lie about sexual assault. *Id.* After *voir dire* the defendant made several motions for a mistrial, arguing that the panel had been tainted by the exchange between the court and the social worker prospective juror *Id.* The trial court denied the motions. *Id.* *Mach* was convicted.

In reversing *Mach*'s conviction, the 9<sup>th</sup> Circuit ruled, that, “[a]t a minimum... the court should have conducted further *voir dire* to determine whether the panel had in fact been infected by [the prospective juror's] expert-like statements.” *Id.* at 633.

This is important because, in the instant case, *further voir dire is exactly what the trial court did*. After Juror #54's statement, the trial court asked the prospective jurors; 1) who heard the remarks; and 2) if they believed it would affect their ability to be fair and impartial. After dismissing all prospective jurors who stated they heard the remark and could not be fair and impartial, each side was given further opportunity to ask questions and use their preemptory challenges. The Defendant used his to strike those jurors who equivocated about being fair and impartial, as he concedes. Brief of Appellant at 6.

This is precisely what *voir dire* and preemptory challenges are for. The trial court did exactly what the *Mach* trial court did not. And for that reason, this court should uphold the denial of the motion for a mistrial and uphold the Defendant's conviction.

**That the jury expressed hostility towards drugs is not a reason for reversal.**

The Defendant also argues that the *venire's* expressions of dismay concerning the effects of drugs on society is more proof that the jury was tainted. He cites to no case that holds jurors cannot disapprove of criminal behavior in order to be impartial enough to sit on a jury.

It would be odd if any juror in a rape or murder case was not opposed to rape or murder. Yet jurors with strong reservations about the

effect these crimes have upon individuals and society at large are seated and hear such cases every day. This court should not consider the jurors' expressed reservations as implicit bias, especially since all empaneled jurors assured the court that they could be fair and impartial.

**There was no structural error.**

The Defendant argues that continuing with a jury exposed to Juror #33's revelation is structural error. No Washington case holds as much. Therefore, the Defendant makes his argument based on the 10<sup>th</sup> Circuit case *U.S. v. Iribe-Perez*, 129 F.3d 1167, 1172 (10th Cir. 1997).<sup>5</sup> But the *Iribe-Perez* court declined to characterize the error in that case "structural."

In *Iribe-Perez* the defendant decided to plead guilty on the morning of trial, and the trial judge explained to the jury that the Defendant would be pleading guilty. *Iribe-Perez* at 1169-70. After the plea was unsuccessful, the court reassembled the same jurors and ordered the trial to commence. *Id.* at 1170.

The *Iribe-Perez* court declined to explicitly hold that the error was structural, stating, "regardless of whether we label the error in this case as 'structural' or 'trial'... we are satisfied that the violation of the

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<sup>5</sup> As previously noted, to the extent applicable to the instant case, these federal Circuit Court decisions are "entitled to great weight," but do not bind this court. *Feis, Supra.*

defendant's right in this case was of such constitutional magnitude that it cannot be subjected to harmless error review.” *Id.* at 1172.

This holding is similar to *Mach v. Stewart*, where the Ninth Circuit also declined to hold that the error was “structural” at the defendant’s invitation. *Mach* at 634.

To any extent that the case at bar is similar to *Mach* and *Iribe-Perez*, this court should not establish such a precedent when two federal circuit courts were obviously unwilling to do so.

**Conclusion.**

Even if Juror #33’s comment had been made to the entire jury panel during the presentation of evidence, the *Hopson* factors support the trial court’s decision. There is no precedent that establishes that jurors who disapprove of criminal conduct cannot be jurors. This court should uphold the trial court’s denial of the motion for mistrial and affirm the conviction.

**2. The trial court properly balanced the probity of the Defendant’s prior convictions against the prejudice, and did not abuse discretion by admitting the evidence.**

The Defendant claims that use of the Defendant’s prior conviction to impeach his testimony was error. However, the trial court conducted the *Alexis* balancing test on the records, and decided the probative value of

the convictions outweighed the prejudice. Additionally, admission of this evidence was proper because without it, the jury would have had a distorted view of events. Finally, such admission affect the outcome.

**Standard of review.**

A decision to admit evidence of prior crimes is within the discretion of the trial court, and will not be overturned absent a showing of abuse of discretion.” *State v. Norlin*, 134 Wn.2d 570, 576, 951 P.2d 1131, 1133 (1998) (citing *State v. Laureano*, 101 Wn.2d 745, 764, 682 P.2d 889 (1984), *overruled on other grounds by State v. Brown*, 113 Wn.2d 520, 782 P.2d 1013, 80 A.L.R.4th 989 (1989).) An abuse of discretion only occurs when no reasonable judge would have reached the same conclusion. *Hopson* at 284.

**The trial court properly balanced the probative nature of the conviction against the prejudicial value.**

ER 609(a)(1) provides, in relevant part,

For the purpose of attacking the credibility of a witness in a criminal or civil case, evidence that the witness has been convicted of a crime shall be admitted if elicited from the witness or established by public record during examination of the witness but only if the crime... was punishable by... imprisonment in excess of 1 year under the law under which the witness was convicted,

and the court determines that the probative value of admitting this evidence outweighs the prejudice to the party against whom the evidence is offered...

The test for evaluating whether the probative value outweighs the prejudice pursuant to ER 609(a)(1) is called the *Alexis* factors. See *State v. Gonzales*, 83 Wn. App. 587, 590, 922 P.2d 210, 212 (1996).

The *Alexis* factors are:

- 1) the length of the defendant's criminal record;
- 2) remoteness of the prior conviction;
- 3) the nature of the prior crime;
- 4) the age and circumstances of the defendant at the time of the crime that is being offered for admission;
- 5) centrality of the credibility issue; and
- 6) the impeachment value of the prior crime.

*State v. Alexis*, 95 Wn.2d 15, 19, 621 P.2d 1269, 1271 (1980). This analysis must be conducted on the record. *State v. Hardy*, 133 Wn.2d 701, 712, 946 P.2d 1175, 1179 (1997).

In the instant case, the court properly conducted an on-the-record analysis of all six of the *Alexis* factors. First, the court took notice of the

Defendant's lengthy criminal history, and decided that it favored admission. RP at 102-03.

Next, the court observed that the conviction was not remote, but recent; it occurred just six years ago, and the Defendant had been sentenced to over two years in prison. RP at 103.

Third, the court considered the nature of the offense, Unlawful Possession of a Firearm, and considered it a serious felony. RP at 103.

Fourth, the court considered the age and circumstances of the Defendant at the time of the crime, the court noted that the Defendant was not young when the crime had been committed, and had "a lifetime of criminal convictions." RP at 103-04. The court had previously been informed that the Defendant was 41, so he would have been in his mid-30s at the time of the crime. *See* RP at 101.

Fifth, the court ruled that credibility was going to be central to the case. RP at 104. This is undoubtedly true, as both men in the car claimed that the backpack belonged to the other. Finally, the court said that although "argument can be made that [the conviction] doesn't have high impeachment value" the court believed that there was impeachment value to Unlawful Possession of a Firearm. RP at 104.

After conducting the analysis, in which the court found that all six factors weighed towards admitting evidence of the prior conviction, the court ruled that it would be admissible. That decision should be upheld and the conviction affirmed.

**An Unlawful Possession of a Firearm conviction raises concerns about a witnesses ability to be truthful.**

The Defendant dismisses the court's statement that there is impeachment value to the crime of Unlawful Possession of a Firearm as mere verbiage, but cites to no case that holds that such a crime is not probative of honesty. A person who loses his or her right to possess a firearm, and then does so, disregards a lawful order, and displays a disregard for the rule of law when he or she possesses a firearm. The crime is, essentially, disregarding a court's order to not possess firearms. This should raises a concern as to whether such a person will obey the oath to tell the truth administered by the court, given the cavalier disregard for other court orders such a conviction shows.

Such a conviction is probative of honesty, and the jury ought to know about such a prior conviction. This court should hold that possessing firearms after losing one's right to possess firearms is probative of a witnesses ability to tell the truth under oath.

**Evidence of the Defendant's prior conviction was essential to give the jury an accurate view of the situation.**

Evidence of the Defendant's prior conviction was also necessary to give the jury a proper view of the facts. The Defendant was allowed, in cross-examination of state witness Drew McGuire, to inquire concerning Mr. McGuire's prior drug use. RP at 96. He was allowed to inquire of Mr. McGuire's association with other drug users. RP at 89. He was permitted to go into great detail concerning Mr. McGuire's drug use habits. RP at 88-89.

This is important because the case came down to whose story the jury were to believe - the Defendant's or McGuire's. The Defendant testified that the backpack was in the car when he got in. RP at 146. Mr. McGuire testified the Defendant got in with the backpack. RP at 69-70. Without knowledge of the Defendant's prior conviction, the jury would have had a distorted view of the two men.

In *State v. Millante*, a murder case, the defendant claimed self-defense, and took the stand. *State v. Millante*, 80 Wn.App 237, 243, 908 P.2d 374 (1995). The State wanted to introduce the defendant's five prior felony convictions to impeach his testimony. *Id.* at 244. The court used the *Alexis* factors, and decided that, because credibility was paramount in the case, and without evidence of his prior convictions, the jury would

have no way to judge the Defendant's testimony, and admitted the evidence. *Id.* at 245. Division 1 of this court upheld that decision. *Id.*

Without the evidence of the Defendant's prior conviction, the jury would have been presented a view of McGuire as a former meth addict, driving around Aberdeen while under the influence of heroin without a license, while the Defendant would be as if he had dropped unsullied from heaven and gotten into a car driven by a dangerous degenerate purely by bad luck. With the evidence of the Defendant's prior convictions, the jury were presented with a more accurate picture; both men were criminals. It was then up to the jury who to believe based upon whatever other criteria the jury decided was relevant.

Like in *Millante*, the evidence of the Defendant's prior conviction was necessary to give the jury a way to weigh the credibility of the Defendant. There was no error. This court should uphold the conviction.

**3. There was no cumulative error.**

Denying the motion for a mistrial was not error. Neither was admission of the Defendant's prior convictions for impeachment purposes. Therefore, there was no cumulative error. This court should uphold the conviction.

## CONCLUSION

During *voir dire* a juror's admission could have led some jurors to believe the Defendant associated with drug users, or perhaps used drugs at some point in the indeterminate past. This admission was not serious, cumulative of other evidence at trial, and quickly and appropriately addressed by the trial judge. The nine jurors who said they had heard the admission and were empanelled said they could be fair and impartial. Jurors are assumed to be impartial and jurors are presumed to follow their instructions. Our system could not work if it were otherwise. The motion for a mistrial was properly denied and this court should uphold that decision.

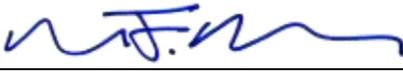
The trial court's decision to admit evidence of the Defendant's prior conviction for possessing firearms after he lost that right was within the court's discretion and proper. The trial court performed the test for whether such a conviction is more probative than prejudicial on the record, in accordance with *Alexis* and ER 609. Further, the prior conviction did have probative value. That decision should also be upheld.

Because these alleged errors were not errors, there was no cumulative error that deprived the Defendant of a fair trial.

The Defendant received a fair trial. His convictions should be affirmed.

DATED this 15<sup>th</sup> day of April, 2019.

Respectfully Submitted,

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# GRAYS HARBOR PROSECUTING ATTORNEY

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## Transmittal Information

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