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No. 53447-9-II

COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

vs.

RUSSELL ARTHUR MARTIN,

Appellant.

On Appeal from the Pierce County Superior Court
Cause No. 17-1-01043-1
The Honorable Michael Schwartz, Judge

OPENING BRIEF OF APPELLANT

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I. ASSIGNMENTS OF ERROR

1. The trial court erred when it entered Finding of Fact 11 in its written Findings and Conclusions on Admissibility of Evidence CrR 3.6, Franks Hearing, and in Camera Review (CP 224)
2. The trial court erred when it entered Finding of Fact 4 in its written Findings and Conclusions on Admissibility of Evidence on Defendant's Motion for Reconsideration of the Court's Ruling on the CrR 3.6 Motion to Suppress Evidence (CP 229).
3. The trial court erred when it found that the Deputy had an arrest warrant for Russell Martin.
4. The trial court erred when it concluded that the entry into Russell Martin's trailer was justified because the Deputy had a warrant for his arrest.
5. The trial court erred when it concluded that the entry into Russell Martin's trailer was justified for officer safety reasons pursuant to the exigent circumstances exception to the search warrant requirement.
6. The trial court erred when it denied Russell Martin's CrR 3.6 motion to suppress the evidence gathered during a search of

his trailer.

II. ISSUES PERTAINING TO THE ASSIGNMENTS OF ERROR

1. Where the Deputy affiant did not request an arrest warrant for Russell Martin, and the search warrant did not authorize Martin's arrest, did the trial court err when it found that the Deputy had an arrest warrant for Russell Martin, and when it concluded that the entry into Martin's trailer was justified in order to arrest Martin pursuant to an arrest warrant? (Assignments of Error 1, 2, 3, & 4)
2. Were there sufficient facts presented at the CrR 3.6 hearing to support the trial court's conclusion that the State established the exigent circumstances exception to the search warrant requirement? (Assignment of Error 5)
3. Were there sufficient facts presented at the CrR 3.6 hearing to support the trial court's determination that the warrantless entry into Russell Martin's trailer was necessary for officer safety reasons, where there was no indication that Martin could escape capture, where the Deputy's interactions with Martin before entering the trailer were calm and nonthreatening, where there were at least a dozen officers on the scene to provide backup to the Deputy, and where

the Deputy testified that the most dangerous location he could have been in was actually located inside the trailer? (Assignment of Error 5)

3. Should the trial court have granted Russell Martin's CrR 3.6 motion to suppress the evidence collected during the execution of a search warrant for the trailer, where the items that provided probable cause for the warrant were only discovered after the Deputy conducted an unjustified warrantless entry into the trailer? (Assignment of Error 6)

III. STATEMENT OF THE CASE

Based on information provided by a confidential informant (CI), Pierce County Sheriff's Deputy Robert Tjossem sought a warrant to search a residence belonging to Russell Martin. (10/23/18 RP 24; CP 41-45, 46-47)[1] According to Deputy Tjossem, a "reliable" CI participated in two successful controlled drug buys and provided information that lead to the successful seizure of controlled substances and to charges being filed against several individuals. (CP 43)

The CI had recently provided information that Russell Martin

[1] All transcripts will be referred to by the date of the proceeding contained therein.

was selling controlled substances from his residence. (CP 43) The CI told Deputy Tjossem that they had recently been inside Martin's house and had seen Martin weigh and sell a large amount of heroin, and saw that Martin had a firearm. (CP 44) The reviewing magistrate signed the search warrant, permitting law enforcement to search Martin's house and his person for controlled substances, weapons, and evidence of a drug distribution operation. (10/23/18 RP 24; CP 46-47)

Deputy Tjossem and about a dozen other members of the Special Investigations Unit arrived at Martin's property around 6:00 AM on March 10, 2017, to execute the warrant. (10/23/18 RP 22, 25, 42; CP 220) While the other officers focused their attention on the house, Deputy Tjossem walked the perimeter and noticed a fifth wheel trailer parked in the driveway about 10 feet from the house. (10/23/18 RP 24, 26) As he walked between the house and the trailer, Deputy Tjossem heard multiple voices and banging sounds coming from inside the trailer. (10/23/18 RP 26) A man opened the door and looked outside. (10/23/18 RP 27) Deputy Tjossem ordered the man to go back inside, and the man complied. (10/23/18 RP 27) Deputy Tjossem then realized the man was Russell Martin. (10/23/18 RP 28)

Deputy Tjossem testified that he was concerned for his safety because he knew there were at least two people inside the trailer, and knew that the confidential informant had reported seeing Martin with a firearm. (10/23/18 RP 29) He did not know if the people inside might be arming themselves. (10/23/18 RP 29) So he called to the other officers and requested backup. (10/23/18 RP 29)

Sergeant Paul Schneider arrived shortly after. (10/23/18 RP 65) Deputy Tjossem then knocked on the trailer door and Martin answered. (10/23/18 RP 29) Deputy Tjossem entered without drawing his firearm, and took Martin into custody without incident. (10/23/18 RP 30-31) One by one, Deputy Tjossem ordered the other occupants of the trailer to exit as well. (10/23/18 RP 31)

While he was inside the trailer, Deputy Tjossem saw what appeared to be a methamphetamine smoking device (bong) and a surveillance monitor that showed the driveway and approach to the residence and trailer. (10/23/18 RP 29; CP 220) Based on these new observations, Deputy Tjossem sought and obtained a second search warrant for the trailer. (CP 48-53)

Upon searching the trailer, officers found several packages of what they believed were controlled substances, a large amount

of cash, packaging materials and a digital scale, multiple cellular telephones, a ledger with notes and dollar amounts, and five operable firearms. (03/11/19 RP 549, 551-55, 568-69, 571, 589-90, 595-96; 03/12/19 RP 617-18, 620, 622, 623, 634-35, 643-44, 646, 682, 683, 685, 700, 704, 722, 724, 726, 743, 747) Martin also had $2,700.00 in cash in his pocket. (03/11/19 RP 503) The officers did not find any contraband inside the house. (10/23/18 RP 29 51; CP 222)

The State charged Martin with two counts of unlawful possession of a controlled substance with intent to deliver (count 1 heroin and count 2 methamphetamine). (CP 3-6) The State alleged that Martin was armed with a firearm when he committed these crimes, and that both crimes were major violations of the uniform controlled substances act. (CP 3-6) The State also charged Martin with five counts of unlawful possession of a firearm. (CP 3-6)

Martin moved to suppress the items collected during the search of the trailer, arguing that no exigency existed and that the original search warrant for the house was invalid because Deputy Tjossem failed to inform the magistrate of the CI's multiple convictions for crimes of dishonesty. (CP 27-40) The trial court

found that the facts presented a “close case,” but ultimately denied the motion. (10/23/18 RP 79, 83-84, 93-94, 96-110; CP 218-226)

After viewing the previously undisclosed surveillance video showing Deputy Tjossem’s initial approach and entry into the trailer, and another Deputy’s subsequent entry while waiting for the second search warrant, Martin moved the court to reconsider its decision. (Exh. 8; CP 154-207) The trial court again denied the motion and declined to suppress the evidence. (02/26/19 RP 270-74; CP 226-31)

At trial, the State presented testimony that the substances located in the trailer were tested and determined to contain heroin and methamphetamine. (03/12/19 RP 713-18) The five firearms were tested and found to be operable. (03/12/19 RP 672-75) Martin also stipulated that he had a prior conviction and as a result was forbidden from possessing a firearm. (03/13/19 RP 809-10)

The officers testified that the large amount of drugs was inconsistent with personal use, and that the large amount of cash, the digital scale, multiple cellular telephones, and packaging materials were all consistent with a drug distribution operation. (03/11/19 RP 569; 03/12/19 RP 624, 628-29, 647-48, 650-51, 724, 755)

A jury convicted Martin as charged. (03/14/19 RP 887-90; CP 316-26) The jury also found that Martin was armed with each of the five different firearms when he committed the two possession of a controlled substance crimes. (CP 317-18, 320-21) The trial court imposed a term of confinement totaling 262 months. (03/19/19 RP 917; CP 369) Martin filed a timely Notice of Appeal. (CP 367)

IV. ARGUMENT & AUTHORITIES

The original warrant allowed the officers to search Martin's house. (CP 46-47) Deputy Tjossem obtained a second warrant to search the trailer only because he observed the meth bong and surveillance monitor after he entered the trailer to seize Martin. (CP 48-53) The trial court incorrectly found that Deputy Tjossem was reasonably justified in entering the trailer without a search warrant. The evidence did not establish that the entry was permitted in order to execute an arrest warrant or that exigent circumstances existed.

The United States and Washington Constitutions prohibit most warrantless searches of homes. *State v. Smith,* 165 Wn.2d

511, 517, 199 P.3d 386 (2009).[2] Police may only search without a warrant under one of the "'few jealously and carefully drawn exceptions to the warrant requirement.'" *Smith,* 165 Wn.2d at 517 (quoting *State v. Kinzy,* 141 Wn.2d 373, 384, 5 P.3d 668 (2000)). The State bears the burden of proving that any warrantless search fits within one of these exceptions. *Smith.* 165 Wn.2d at 517.

On appeal of a denial of a motion to suppress evidence based on an improper warrantless search, the superior court's factual findings are reviewed for substantial evidence. *State v. Broadaway,* 133 Wn.2d 118, 130, 942 P.2d 363 (1997). Evidence is substantial if "there is a sufficient quantity of evidence in the record to persuade a fair-minded, rational person of the truth of the finding." *State v. Hill,* 123 Wn.2d 641, 644, 870 P.2d 313 (1994). The trial court's legal conclusions are reviewed de novo. *State v. Johnson,* 128 Wn.2d 431, 443, 909 P.2d 293 (1996).

A. DEPUTY TJOSSEM'S WARRANTLESS ENTRY INTO THE TRAILER WAS NOT SUPPORTED BY THE GROUND THAT HE WAS CARRYING OUT AN ARREST WARRANT.

The magistrate did not authorize an arrest warrant for Martin.

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[2] U.S. Const. amend. IV ("The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated."); Wash. Const. Art. I, § 7 ("No person shall be disturbed in his private affairs, or his home invaded, without authority of law.").

Deputy Tjossem therefore did not have authority to enter the trailer to seize Martin pursuant to an arrest warrant.

Under both federal and Washington state law, a felony arrest warrant gives the police the authority to enter the house of the accused for a brief period of time in order to carry out the arrest. *State v. Hatchie*, 161 Wn.2d 390, 395-96, 166 P.3d 698 (2007) (and cases cited therein); *Steagald v. United States,* 451 U.S. 204, 214 n. 7, 101 S. Ct. 1642, 68 L. Ed. 2d 38 (1981) ("[A]n arrest warrant authorizes ... a limited invasion of that person's privacy interest when it is necessary to arrest him in his home"). Without an arrest warrant, "the Fourth Amendment ... prohibits the police from making a warrantless and nonconsensual entry into a suspect's home in order to make a routine felony arrest." *Payton v. New York,* 445 U.S. 573, 576, 100 S. Ct. 1371, 63 L. Ed. 2d 639 (1980).

In Finding of Fact 11 entered after the initial hearing on the motion to suppress, the trial court states that the first search warrant "was also an arrest warrant to seize Mr. Martin and search his person." (CP 221) In the written Findings and Conclusions entered after the court denied Martin's request for reconsideration, the court also noted in Finding of Fact 4 that Deputy Tjossem

"entered the trailer to arrest Russell Martin pursuant to the warrant." (CP 229) These finding are erroneous because there was no arrest warrant.

In his application for a search warrant, Deputy Tjossem states that he believes that a "search of the described residence will produce evidence of the previously described Unlawful Possession of a Controlled Substance crimes. Your Affiant respectfully requests permission to search the described person, properties, and/or vehicles." (CP 45) Deputy Tjossem does not request an arrest warrant.

The search warrant grants Deputy Tjossem permission "to enter and search the said vehicles, persons, and premises, to wit: 7002 224th Street E, a Brown and tan with trim, 2076 square foot single story residence with white front door … [and] Russell A. Martin, white male, born 03-04-1980." (CP 47) This warrant, by its plain terms, allows officers to search Martin, but there is nothing in this language authorizing the officers to arrest Martin. Finding of Fact 11 and Finding of Fact 4 are not supported by the evidence.

During argument on the motion to suppress, defense counsel alerted the trial court to the fact that the warrant did not authorize the arrest of Martin. (10/23/18 RP 77-78) But the trial

court dismissed counsel's concern, stating "Oh, no, I take issue with that. That warrant gave him the authority to seize his person, that's an arrest[.]" (10/23/18 RP 78) But the court was incorrect again—the warrant did not authorize Deputy Tjossem to "seize" Martin, it only authorized the Deputy to search Martin. (CP 46-47)

As a result, the court's conclusion that entry into the trailer was justified in part because "Deputy Tjossem had a warrant for Mr. Martin's arrest" is also erroneous.[3] There was no arrest warrant to justify Deputy Tjossem's entry into the trailer.

B. DEPUTY TJOSSEM'S WARRANTLESS ENTRY INTO THE TRAILER WAS NOT JUSTIFIED BY OFFICER SAFETY CONCERNS.

The trial court also concluded that Deputy Tjossem's entry was permissible under the exigent circumstances exception to the warrant requirement. (CP 224; 10/23/18 RP 83-84) The trial court concluded that Deputy Tjossem "had concerns that Russell Martin or one of the other occupants might be able to access a weapon and surprise the officers," and that "it makes sense he wanted to see the other occupants inside the trailer for officer safety reasons."

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[3] See Conclusion of Law 5 in the trial court's Findings and Conclusions on Admissibility of Evidence CrR 3.6, Franks Hearing, and in Camera Review (CP 224) and Reason for Admissibility 1 in the court's Findings and Conclusions on Admissibility of Evidence on Defendant's Motion for Reconsideration of the Court's Ruling on the CrR 3.6 Motion to Suppress Evidence (CP 229).

(CP 224, 229) However, the facts do not support the trial court's conclusions.

Under this exception, police may conduct a warrantless search when exigent circumstances justify the search. *State v. Cardenas,* 146 Wn.2d 400, 405, 47 P.3d 127, 57 P.3d 1156 (2002). "The rationale behind the exigent circumstances exception 'is to permit a warrantless search where the circumstances are such that obtaining a warrant is not practical because the delay inherent in securing a warrant would compromise officer safety, facilitate escape or permit the destruction of evidence.'" *Smith,* 165 Wn.2d at 517 (quoting *State v. Audley,* 77 Wn. App. 897, 907, 894 P.2d 1359 (1995)). Danger to the arresting officer or to the public can present an exigent circumstance. *State v. Tibbies,* 169 Wn.2d 364, 370, 236 P.3d 885 (2010) (quoting *State v. Counts,* 99 Wn.2d 54, 60, 659 P.2d 1087 (1983)).

In determining whether exigent circumstances exist, courts consider the totality of the situation in which the circumstance arose. *Smith*, 165 Wn.2d at 518. Six nonexclusive factors guide this analysis:

> (1) the gravity or violent nature of the offense with which the suspect is to be charged; (2) whether the suspect is reasonably believed to be armed; (3)

> whether there is reasonably trustworthy information that the suspect is guilty; (4) there is strong reason to believe that the suspect is on the premises; (5) a likelihood that the suspect will escape if not swiftly apprehended; and (6) the entry [can be] made peaceably.

Cardenas, 146 Wn.2d at 406. "[I]t is not necessary that every factor be met to find exigent circumstances, only that the factors are sufficient to show that the officers needed to act quickly." *Cardenas*, 146 Wn.2d at 408.

Here, the trial court addressed the six factors in its written Findings of Fact:

> 13. …Deputy Tjossem does not indicate whether he believes that Mr. Martin was armed. But the court needs to take into consideration that there was a search warrant which was signed based on reliable information by an informant that Mr. Martin had access to weapons.
>
> 14. From the facts that Deputy Tjossem reasonably understood, there was more than one person inside the trailer…. Given the entry way into the trailer was small enough that the ability of Mr. Martin to grab a weapon which at the time was unseen by the Deputy, is always an issue in these types of cases.
>
> 15. There was reasonably trustworthy information that the suspect was guilty….
>
> 16. Mr. Martin was on the premises and the Deputy saw him.
>
> 17. Mr. Martin was not likely to escape because of the number of Officers present and where he was positioned in the threshold of the fifth wheel trailer.
>
> 18. This was not a grave offense.

> 19. Entry into the fifth wheel trailer was peaceable as there were no guns drawn, no evidence of threats, and Mr. Martin was cooperative.

(CP 221-22) The trial court thus found that four of the six factors were met.

However, considering the totality of the situation in this case, these four factors are insufficient to show that Deputy Tjossem "needed to act quickly." *Cardenas,* 146 Wn.2d at 408. The idea that Deputy Tjossem needed to enter the trailer for his own or other officers' safety is contradicted by his testimony and also defies logic.

Deputy Tjossem testified that Martin opened the door and looked outside, then complied with Tjossem's command to go back inside. (10/23/19 RP 27) Then Deputy Tjossem stood next to the trailer and waited for backup to arrive. (10/23/19 RP 28-29) Later, when Tjossem knocked on the door, Martin opened it and submissively stepped back to allow Tjossem to enter. (10/23/19 RP 29; CP 221) There was "no evidence of threats, and Mr. Martin was cooperative." (CP 222) Martin was non-combative and non-threatening, and gave Deputy Tjossem no reason to believe he posed any danger to the Deputy's safety.

Deputy Tjossem also testified that he was concerned

because he was outnumbered and did not know if the occupants were arming themselves. (10/23/18 RP 29) But there were at least a dozen other highly trained officers on the scene that were available as backup. (10/23/19 RP 42; CP 220) And if Deputy Tjossem believed the occupants had armed themselves, it seems illogical that he would choose to enter into the small confined trailer to confront them.

Deputy Tjossem also testified that he moved through the entryway and into the main part of the trailer (where he observed the meth bong) because he did not want to be stuck "standing in the fatal funnel," which he explained is the narrow, confined entryway into the main living area of the trailer that is "a bad place to be in if there is going to be a gun fight." (10/23/18 RP 53-54; CP 220) But Deputy Tjossem would not have been in the "fatal funnel" if he had not chosen to enter the trailer, and had instead taken cover outside and ordered the occupants to exit.

The facts simply do not show that Deputy Tjossem needed to act quickly and enter the trailer in order to protect himself or the other officers from harm. The trial judge said it best when, after hearing testimony and viewing the surveillance video, he states:

The whole issue about officer safety has to be based

> on particularized facts. Okay. An officer can't just say, "I did this for officer safety reasons," without some facts. When you watch the video, he doesn't have his service weapon drawn. He has nobody, nobody at all, despite the fact that there is a tactical squad present covering the windows and peering in the windows. Okay. The evidence didn't demonstrate that there was any commands given to anybody inside, okay. There is nothing from the evidence indicating here that Mr. Martin was uncooperative. In fact, Mr. Martin answered the door first, was told to go back inside, again, that's contrary to any notions of officer safety, and then knocked or announced the second time. He comes to the door a second time, okay, he still -- there is no indication that he has a weapon, or that he wants -- or that he is attempting to flee, or that he is being combative, or anything else.
>
> Here is the other thing. Okay. This whole argument about not stepping into the threshold because that's the fatal funnel, because there is nowhere to move. Your officer is incorrect. He actually stepped into the fatal funnel. He stepped into an enclosed area and where he stepped there was no escape. If he remains outside of the trailer, there are plenty of places for him to take cover and also draw his weapon.
>
> And so Mr. [Prosecutor], with all due respect, the officer safety issue is not one that I think is well demonstrated by the facts here thus far[.]

(10/23/18 RP 67-68)

But then, when the trial court makes its final ruling on the motion to suppress, the judge inexplicably finds that an exigency did exist because Deputy Tjossem "wants to be able to see the other occupants, and from an officer's safety standpoint that makes

sense." (10/23/18 RP 83) But the judge's initial reasoning was correct because "the officer safety issue is not … well demonstrated by the facts[.]" (10/23/18 RP 67-68) Deputy Tjossem did not need to enter the trailer to ensure his safety or to see the occupants of the trailer, when he could have instead called for additional backup and ordered the occupants to exit.

The trial court's conclusion that Deputy Tjossem's warrantless entry into the trailer was justified is not supported by the facts. Deputy Tjossem violated Martin's constitutional privacy rights when he entered without a warrant and where no valid exception to the warrant requirement existed. When an unconstitutional search occurs, all subsequently uncovered evidence becomes fruit of the poisonous tree and must be suppressed. *State v. Ladson*, 138 Wn.2d 343, 359, 979 P.2d 833 (1999) (citing *State v. Kennedy*, 107 Wn.2d 1, 4, 726 P.2d 445 (1986)).

Any evidence discovered as a result of Deputy Tjossem's entry into the trailer is fruit of the poisonous tree, and should not have been used to obtain the second warrant to search the trailer. Any evidence discovered during the search of the trailer is also fruit of the poisonous tree, and should have been suppressed.

V. CONCLUSION

Deputy Tjossem did not have an arrest warrant for Martin, so his entry into the trailer was not justified on the grounds that he was executing an arrest warrant. There were also insufficient facts to warrant a conclusion that entry into the trailer was necessary to protect Deputy Tjossem's safety. Deputy Tjossem did not have legal authority to enter the trailer. Everything he saw after he entered the trailer, and all evidence gathered as a result of the subsequent search of the trailer, is fruit of the poisons tree. All of this evidence must be suppressed, and Martin's convictions must be reversed.

DATED: October 30, 2019

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CERTIFICATE OF MAILING

I certify that on 10/30/2019, I caused to be placed in the mails of the United States, first class postage pre-paid, a copy of this document addressed to: Russell Arthur Martin, DOC# 878521, Washington Corrections Center, P.O. Box 900, Shelton, WA 98584.

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