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Division II
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NO. 53843-1-II

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

STATE OF WASHINGTON,

Respondent,

v.

TIMOTHY LLOYD MENZIES, JR.

Appellant.

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

The Honorable Garold E. Johnson, Judge

AMENDED BRIEF OF APPELLANT

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TABLE OF CONTENTS

Page

A. ASSIGNMENTS OF ERROR 1

Issues Pertaining to Assignments of Error 1

B. STATEMENT OF FACTS 2

1. Procedural History 2

2. Resentencing & Appeal 2

C. ARGUMENT 4

THE TRIAL COURT ERRED BY IMPOSING VARIOUS LFOS ON AN INDIGENT DEFENDANT. ….. 4

1. Menzies was and remains indigent. 5

2. The costs of supervision and collections are discretionary..... 5

3. The costs of supervision and collections are "costs." 8

4. The record indicates these costs were imposed inadvertently and without the required individualized inquiry. 14

5. This Court should address even those LFOs being raised for the first time on appeal. 18

D. CONCLUSION 18

TABLE OF AUTHORITIES

Page

WASHINGTON CASES

City of Richland v. Wakefield
186 Wn.2d 596, 380 P.3d 459 (2016) 13

Heinsma v. City of Vancouver
144 Wn.2d 556, 29 P.3d 709 (2001) 12

In re Pers. Restraint of Arnold
190 Wn.2d 136, 410 P.3d 1133 (2018) 9

State v. Abarca
11 Wn. App. 2d 1012, 2019 WL 5709517 (Div. II.2019) 6, 8, 9, 13-15

State v. Catling
193 Wn.2d 252, 438 P.3d 1174 (2019) 13, 13 n.5

State v. Clark
191 Wn. App. 369, 362 P.3d 309 (Div. III.2015) 8, 9, 13

State v. Dillon
12 Wn. App. 2d 133, 456 P.3d 1199 (Div. I.2020) 6, 8, 14, 15

State v. Glover
4 Wn. App. 2d 690, 423 P.3d 290 (2018) 18

State v. Lundstrom
6 Wn. App. 2d 388, 429 P.3d 1116 (2018)
review denied, 193 Wn.2d 1007 (2019) 6, 7

State v. Ramirez
191 Wn.2d 732, 426 P.3d 714 (2018) 14, 15

State v. Reamer
9 Wn. App. 2d 1077, 2019 WL 3416868 (unpublished) 8

State v. Watson
146 Wn.2d. 947, 51 P.3d 66 (2002) 12

TABLE OF AUTHORITIES (CONT'D)

Page

State v. Wolf
12 Wn. App. 2d 1016, 2020 WL 638891 (Div. III.2020) 7

RULES, STATUTES AND OTHER AUTHORITIES

GR 14.1 ..... 6 n.1, 7 n.2, 8 n.3, 9

RCW 9.94A.703 6

RCW 10.01.160 ..... 4, 8-10, 13, 14

RCW 10.101.010 11

RCW 36.18.190 ..... 7, 12-14

Webster's Third New International Dictionary of the English Language, Unabridged 11-12 n.4

A. ASSIGNMENTS OF ERROR

1. The trial court erred by imposing the costs of collections.

2. The trial court erred by imposing the costs of community custody.

3. The trial court erred by failing to conduct an individualized inquiry into the appellant Timothy Menzies, Jr.'s ability to pay.

Issues Pertaining to Assignments of Error

1. Where the trial court found Menzies indigent, are the costs of collections statutorily prohibited?

2. Give the above, are the costs of community custody statutorily prohibited?

3. The trial court and parties failed to discuss the above-mentioned costs, to discuss Menzies' ability to pay (aside from noting his indigency), or to list the above-mentioned costs in the legal financial obligations (LFOs) section of the written judgment and sentence. Rather those costs were imposed on other pages, in pre-printed blocks of text and appendices. The prosecutor also advised the court that he had modified the judgment and sentence to comply with current law on LFOs.

Given the above, does the record indicate the trial court imposed these two costs inadvertently and without consideration of ability to pay? Is the appropriate remedy to remand to strike these costs?

B. STATEMENT OF FACTS

1. Procedural History

The Pierce County prosecutor's office charged Appellant Timothy Menzies, Jr. with two counts of first degree rape of a child – domestic violence. CP 11-12. The State alleged count I involved rape of K.M. and count II involved rape of a different victim, K.E. CP 11-12. The information also alleged three aggravating factors for both crimes: abuse of position of trust, ongoing pattern of abuse (i.e. multiple offenses per victim over time), and multiple victims. CP 12. Menzies pleaded guilty to both counts and to the three aggravators. CP 21. The trial court found the three aggravating factors that had been alleged and pleaded. CP 64-65.

Menzies appealed. CP 46. The Court of Appeals held the "multiple victims" aggravator was improper because the State had already charged two separate counts, one to address each victim. CP 70-71. The Court remanded for resentencing. CP 70-71. The Court also remanded for the trial court to consider whether the initially imposed LFOs remained proper in light of recent changes to the law. CP 71.

2. Resentencing & Appeal

On remand, the trial court re-imposed the same prison term, this time relying only on the abuse of trust and ongoing pattern of abuse aggravators. RP 6-8; CP 108.

Regarding LFOs, the prosecutor advised the trial court that he had updated the judgment and sentence to reflect the current state of the law on LFOs, and specifically noted that due to Menzies' indigency, the law required the court to strike the $200 criminal filing fee and did not permit interest to accrue on non-restitution LFOs. RP 3. The trial court again found Menzies indigent, and concluded that on the basis of his indigency, neither the $200 filing fee nor interest on nonrestitution LFOs would be imposed. RP 8.

The State and court also discussed the $1,079.65 restitution, $500 victim penalty assessment (VPA), $100 DNA fee would remain as initially imposed. RP 9. The prosecutor stated the "total amount of legal financial obligations are $1,679.65." RP 9. The trial court remarked, "That's appropriate, thank you. Consistent with this Court's ruling." RP 9. There was no discussion of collection or supervision costs. See RP 8.

In the LFOs section of this second judgment and sentence, the trial court imposed the following: $1079.65 in restitution, $500 VPA, $100 DNA fee for a total of $1679.65. CP 105. All sections for other LFOs were left blank on the form. CP 105.

On the next page, in a block of pre-printed text requiring no affirmative mark, the trial court imposed collection costs. CP 106. The trial court also imposed the costs of community custody in in two separate

appendices to the judgment and sentence, again buried in blocks of text requiring no affirmative mark by the trial court. CP 44, 116.

Menzies timely appealed from the judgment and sentence. CP 101. Menzies also filed a declaration attesting to significant debts ($1679.65 in LFOs), and no assets or income of any kind. CP 120-21. The trial court granted the appeal at public expense. CP 124.

C. ARGUMENT

THE TRIAL COURT ERRED BY IMPOSING VARIOUS LFOS ON AN INDIGENT DEFENDANT.

RCW 10.01.160(3) prohibits the imposition of costs on indigent defendants. The trial court violated this statute by imposing the costs of supervision and collections where Menzies was and remains indigent, both costs are discretionary, and both are "costs" under the meaning of RCW 10.01.160(3).

Even if this Court disagrees with the above analysis regarding the statutory interpretation of the term "costs," still the trial court was required to conduct an individualized inquiry on the record before imposing any discretionary costs, and failed to do so here. At a minimum, this would require remand for the trial court to reconsider the imposition of these costs in light of Menzies' inability to pay.

Moreover, the record indicates the trial court imposed these two costs inadvertently, suggesting that remand to strike the costs is the appropriate remedy.

This Court should exercise its discretion to address the error for the first time on appeal and should strike both LFOs.

1. Menzies was and remains indigent.

In its oral ruling, the trial court found Menzies indigent and noted its intent to impose only the $500 Victim Penalty Assessment (VPA), $100 DNA fee, and restitution. RP 9.

In addition, Menzies filed a motion and affidavit attesting to zero assets or income and significant debts (in the form of the LFOs imposed), since the time the trial court found him indigent. CP 120-21. The trial court then found Menzies authorized the appeal to proceed entirely at public expense. CP 124.

Thus, the record indicates Menzies was indigent at the time of sentencing and remains so.

2. The costs of supervision and collections are discretionary.

Despite the finding of indigency, the trial court imposed both the costs of community custody and the costs of collections on Menzies in its written order. CP 44, 106, 116. However, as discussed more below, the trial court did so solely in its written order which contradicted its oral

ruling. Regardless, this Court should conclude the costs of supervision and collections are both discretionary and are both "costs," and as such they may not be imposed on an indigent defendant.

First, both costs are discretionary. RCW 9.94A.703(2) states "unless waived by the court, as part of any term of community custody, the court shall order an offender to: (d) Pay supervision fees as determined by the department." (Emphasis added.) Both Divisions One and Two of the Court of Appeals have authored published opinions asserting that the costs of community custody are discretionary, that it is appropriate for the trial court to consider a defendant's indigency and general ability to pay before imposing the cost, and that waiver of the cost may be appropriate. State v. Lundstrom, 6 Wn. App. 2d 388, 396 n.3, 429 P.3d 1116 (2018), review denied, 193 Wn.2d 1007, 443 P.3d 800 (Div. II.2019); State v. Dillon, 12 Wn. App. 2d 133, 152, 456 P.3d 1199 (Div. I.2020); see also State v. Abarca, 11 Wn. App. 2d 1012, 2019 WL 5709517, *10 (Div.II.2019) (unpublished)[1] (holding "the waivable community custody supervision assessment is discretionary").

Division Three has also indicated its agreement with this proposition with numerous unpublished opinions noting the costs of

[1] Pursuant to GR 14.1 the brief cites to this unpublished opinion not as binding authority, but rather only for any persuasive value this Court deems appropriate.

community custody are waivable and thus discretionary, and by accepting repeated State concessions that the cost was inadvertently imposed and must be stricken. E.g. State v. Santos, __ Wn. App. 2d __, 2020 WL 2079271, *16-17 (accepting State's concession that costs of community custody are waivable, discretionary, and should not have been imposed) (Div. III.2020) (unpublished); also State v. Vasquez, __ Wn. App. 2d __, 2020 WL 1649830,*1 (Div. III.2020) (unpublished) (concluding costs of community custody are waivable and discretionary, and accepting State's concession they were unintentionally imposed); State v. Wolf, 12 Wn. App. 2d 1016, 2020 WL 638891, *9 (Div. III.2020) (unpublished) (same).[2]

In keeping with its decision in Lundstrom, and the numerous cases in agreement, this Court should once again hold the costs of community custody are waivable and thus discretionary.

This Court should find the costs of collections are similarly discretionary. RCW 36.18.190 provides in relevant part, "The superior court may, at sentencing or at any time within ten years, assess as court costs the moneys paid for remuneration for services or charges paid to collection agencies or for collection services." (Emphasis added).

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[2] Pursuant to GR 14.1 the brief cites to these unpublished opinion not as binding authority, but rather only for any persuasive value this Court deems appropriate.

3. The costs of supervision and collections are "costs."

This Court should expressly hold that the costs of community custody and collections are "costs" within the meaning of RCW 10.01.160(3).

The State may argue that RCW 10.01.160 discusses a narrow definition of "costs" that applies only to those costs incurred by the State during prosecution, deferred prosecution, pretrial supervision, or issuance of a warrant.

Division One has rejected this view and concluded the term "costs" encompasses the costs of community custody. Dillon, 12 Wn. App. 2d at 152; see also State v. Reamer, 9 Wn. App. 2d 1077, 2019 WL 3416868, *5 (Div. I.2019) (unpublished).[3] In a case issued prior to the recent statutory amendments, Division Three of the Court of Appeals used reasoning similar to that now deployed by the State to conclude the definition of "costs" was defined and restricted by the first two sentences of the relevant statute. State v. Clark, 191 Wn. App. 369, 375, 362 P.3d 309 (Div. III.2015). Division Two of this Court has followed Division Three and adopted the reasoning of the State post-LFO amendments in a recent unpublished decision. Abarca, 2019 WL 5709517, *10 (Div. II.2019).

[3] Pursuant to GR 14.1 the brief cites to this unpublished opinion not as binding authority, but rather only for any persuasive value this Court deems appropriate.

Neither opinions from other Divisions, nor unpublished opinions from this Division are binding on this Court. GR 14.1 (unpublished opinions are not binding authority); In re Pers. Restraint of Arnold, 190 Wn.2d 136, 154, 410 P.3d 1133 (2018) (rejecting the doctrine of horizontal *stare decisis*). As a result, this Court is not bound by these prior interpretations, and may elect to assign whatever persuasive value to the opinions it deems appropriate.

For the reasons discussed below, Menzies urges Division Two to reverse course and reject the reasoning of Abarca and Clark as inconsistent with various provisions of the relevant statutes. Instead, this Court should hold the statute's prohibition on "costs" applies to all discretionary LFOs, including the costs of community custody and costs of collections.

RCW 10.01.160(1) and (2) provides in relevant part:

> (1) Except as provided in subsection (3) of this section, the court may require a defendant to pay costs. Costs may be imposed only upon a convicted defendant, except for costs imposed upon a defendant's entry into a deferred prosecution program, costs imposed upon a defendant for pretrial supervision, or costs imposed upon a defendant for preparing and serving a warrant for failure to appear.
>
> (2) Costs shall be limited to expenses specially incurred by the state in prosecuting the defendant or in administering the deferred prosecution program under chapter 10.05 RCW or pretrial supervision. They cannot include expenses inherent in providing a constitutionally guaranteed jury trial or expenditures in connection with the maintenance and

> operation of government agencies that must be made by the public irrespective of specific violations of law. …

(emphasis added).

Read in context, the provisions are meant to impose restrictions on the court's general ability to impose costs; these provisions are not definitional.

Specifically, in prior cases, the State has relied upon subpart (2) stating "[c]osts shall be limited to" expenses incurred by the State in prosecution, deferred prosecution, or pretrial supervision. The State has argued this shows the definition of costs is limited to these three categories: prosecution, deferred prosecution, and pretrial supervision.

However, such an interpretation cannot stand in light of subsection (1). Subsection (1) discusses "costs" of deferred prosecution, of pretrial supervision, and of service of warrants. Given that the prior subsection discusses "costs" using three different, overlapping categories reveals that the Legislature's intent in these provisions was not to restrict the definition of "costs" but rather was to describe the new limitations on the court for imposing various types of costs. Under the provisions, for example, courts may not shift to criminal defendants the burden of shouldering constitutionally protected expenses inherent in a jury trial or inherent in operating state agencies. RCW 10.01.160(2). It does not mean that these

expenses are not "costs," but rather that they are not costs that may be imposed.

Further support for this interpretation is found by the absence of any express statutory definition of the term "costs" in RCW 10.101.010. This subsection does provide various other definitions, such as defining the basic terms "indigent" and "income" used elsewhere in the statute. Moreover, RCW 10.101.010 uses the term "costs" in a general manner in order to define various other terms and phrases. For example, subsection (d) defines "Basic living costs" to include "living costs such as shelter, food utilities… ." RCW 10.101.010(2)(d). Subsection (b) defines "Income" to include … "basic living costs." RCW 10.101.010(2)(b) (emphasis added). Subsection (c) defines "Disposable net monthly income" to include "union dues and basic livings costs." RCW 10.101.010(2)(c) (emphasis added).

The provisions discussed above show the Legislature used the term "costs" in the statute in a general, commonsense way to explain a variety of monetary expenses and LFOs; it is not a term that is defined or limited in the statute.[4] In line with this reasoning, the Washington Supreme Court

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[4] Webster's Third New International Dictionary of the English Language, Unabridged, p. 515 (defining "cost" as "1 a: the amount or equivalent paid or given or charged or engaged to be paid or given for anything bought or taken in barter or for service rendered: charge, price b: whatever must be given, sacrificed suffered, or forgone

has stated, "in the absence of a statutory definition this court will give the term its plain and ordinary meaning ascertained from a standard dictionary." State v. Watson, 146 Wn.2d. 947, 954, 51 P.3d 66 (2002).

Moreover, where a term is undefined in a statute and the Court is tasked with interpreting the meaning of that term, the Court should "consider the statute as a whole and provide such meaning to the term as is in harmony with other statutory provisions." Heinsma v. City of Vancouver, 144 Wn.2d 556, 564, 29 P.3d 709 (2001). For the reasons discussed above, a narrow definition of the term "costs" that excludes the costs of collections or supervision is inconsistent with this principle because it does not account for the general way in which the Legislature has used the term "cost" in various related provisions of the statute.

This Court should conclude both the costs of supervision and costs of collections are "costs" under the statute.

There is additional support to conclude the costs of collections are included in the term "costs." RCW 36.18.190 provides in relevant part, "The superior court may, at sentencing or at any time within ten years,

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to secure a benefit or accomplish a result … 2: loss, deprivation, or suffering as the necessary price of something gained or as the unavoidable result or penalty of an action … 3: the expenditure or outlay of money, time, or labor … 4 costs pl : expenses incurred in litigation as a : those payable to the attorney or counsel by his client esp. when fixed by law b" those given by the law or the court to the prevailing against the losing party in equity and frequently by statute – called also bill of costs 5 : an item of outlay incurred in the operation of a business enterprise… in… 6: something that is sacrificed to obtain something else …).

assess as court costs the moneys paid for remuneration for services or charges paid to collection agencies or for collection services." (Emphasis added). Notably, the costs of collections are also labeled as "court costs" by the statute. RCW 36.18.190.

The interpretations of Abarca and Clark should also be rejected in light of contrary indications from a higher authority. The Washington Supreme Court has repeatedly construed "costs" as defined by RCW 10.01.160 to mean all discretionary legal financial obligations. See State v. Catling, 193 Wn.2d 252, 260, 438 P.3d 1174 (2019) (discussing "costs" under RCW 10.01.160 as discretionary LFOs, exclusive only of "fines") (citing City of Richland v. Wakefield, 186 Wn.2d 596, 599-601, 380 P.3d 459 (2016) (discussing same)).[5]

Given the above, this Court should find both the costs of community custody supervision, and the costs of collections are "costs" under the meaning of RCW 10.01.160. The imposition of these costs on Menzies, an indigent defendant, violates RCW 10.01.160(3) and requires remand to strike these LFOs.

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[5] Wakefield also held, among other holdings, that "federal law prohibits courts from ordering defendants to pay LFOs if the person's only source of income is social security disability." 186 Wn.2d at 609. Catling's holding clarified that courts may impose mandatory LFOs on such individuals without violating federal law, but at a subsequent contempt or remittance hearing, courts may not order an individual to pay even "mandatory" LFOs by dipping into his or her social security income. 193 Wn.2d at 261.

4. The record indicates these costs were imposed inadvertently and without the required individualized inquiry.

Even if this Court were to accept the unpublished reasoning in Abarca, Division Two still notes the costs of community custody are discretionary. Abarca, 2019 WL 5709517 at *10. As a result, the Abarca Court indicated that on remand, it would be appropriate for the trial court to reconsider whether these costs should be imposed in light of Abarca's indigency or ability to pay. Id. As noted above, this reasoning applies with equal force to the costs of collections, which are also discretionary as indicated by statute. RCW 36.18.190. In addition, striking the cost outright is another appropriate where the record indicates were imposed inadvertently Dillon, 12 Wn. App. 2d at 152. Both circumstances are present here.

First, nowhere in the record did the trial court make the multi-step, particularized, individualized inquiry into Menzies' ability to pay, as required by State v. Ramirez, 191 Wn.2d 732, 426 P.3d 714 (2018) and RCW 10.01.160 before imposing any discretionary LFOs. Rather, the trial court's only reference to Menzies' ability to pay during the hearing was to find "you are indigent and you will be for some time." RP 8.

Although Menzies' judgment and sentence contains boilerplate text referencing consideration of his ability to pay, Ramirez expressly held

such language was inadequate to meet the individualized inquiry requirement. Ramirez, 191 Wn.2d at 742; CP 56 ("The court has considered … ."). Therefore, even if this Court finds the reasoning of Abarca persuasive, still the indicated remedy would be remand for reconsideration of the costs of community custody and collections after due consideration of Menzies' individual circumstances and ability to pay.

However, where, as here, the record indicates the trial court imposed these costs inadvertently, remanding to strike the costs outright (regardless of whether this Court considers them to be "costs" under the statutory prohibition) is the most appropriate remedy.

Where "[t]he record demonstrates that the trial court intended to impose only mandatory LFOs," the proper remedy is to strike the costs of community custody from the judgment and sentence. Dillon, 12 Wn. App. 2d at 152. Relevant factors include whether the trial court orally stated its intention to impose only mandatory fees, whether it made no mention of the discretionary costs it imposed, whether the LFOs section in the judgment and sentence excludes the discretionary costs from the total, and whether the requirement that the defendant pay such costs is "buried in a lengthy paragraph on community custody." Id. at 17-18.

All of these factors are present here. First, the trial court specifically noted it intended to impose only three LFOs: $1079.65 in

restitution, the $500 victim penalty assessment, and the $100 DNA fee for a total of $1679.65. RP 9.

Second, the trial court made no oral mention of the discretionary costs of collections or community custody in its oral ruling. See RP 9. In fact, in light of this Court's prior ruling on appeal, the trial court declined to impose the $200 criminal filing fee due to Menzies' indigency. RP 8.

Third, the LFO section excludes these costs from its total LFO calculation. The LFO section of the judgment and sentence was consistent with the oral ruling, and imposed $1079.65 in restitution, $500 victim penalty assessment, $100 DNA fee for a total of $1679.65. The trial court left all other lines blank and indicated the total LFOs imposed amounted to $1679.65. CP 105.

Fourth, all written references to the collections and community custody costs were buried in preprinted blocks of text. In one block of pre-printed text, the court imposed the following: "COLLECTION COSTS The defendant shall pay the costs of services to collect unpaid legal financial obligations per contract or statute." CP 106. In two separate appendices in the judgment and sentence, the trial court also imposed the costs of community custody. CP 44, 116.

In appendix F, in the fourth of seven pre-printed conditions, the court imposed the following: "The offender shall pay community placement fees as determined by DOC." CP 116.

Buried in Appendix F was also a reference back to the originally imposed Appendix H, as filed on 10/13/2017. CP 116. Appendix H also contained a buried reference to supervision fees. CP 44. On the third of nine preprinted "standard" conditions, the court also ordered Menzies to "[p]ay supervision fees as determined by the Department of Corrections." CP 44.

None of these three blocks of text required an affirmative mark from the trial court to impose the pre-printed condition. CP 44, 106, 116.

All of these factors indicate the trial court intended to impose only three LFOs—restitution, the victim penalty assessment, and the DNA fee—and inadvertently imposed the discretionary costs of collections and community custody. Where the costs are both indisputably discretionary, where they were imposed inadvertently, and where they were imposed without the required on-the-record ability to pay inquiry, this Court should strike the costs. This result is required and appropriate regardless of this Court's statutory interpretation analysis regarding the definition of the term "costs."

5. This Court should address even those LFOs being raised for the first time on appeal.

In Menzies' case, the parties and court never expressly discussed the costs of collections or costs of supervision. The State may argue this Court should not review these LFOs because they were not raised below. However, "[i]n the wake of Blazina, appellate courts have heeded its message and regularly exercise their discretion to reach the merits of unpreserved LFO arguments." State v. Glover, 4 Wn. App. 2d 690, 693, 423 P.3d 290 (2018). There is no compelling reason to treat Menzies differently. Rather, the interests of justice suggest this issue warrants attention, as does the fact that this issue arises regularly in criminal appeals and repeat players in the trial court system may benefit from clarification as to their obligations.

D. CONCLUSION

For the reasons discussed above, Menzies respectfully requests that this Court remand to strike the costs of collections and community custody, or in the alternative, remand to reconsider the appropriateness of these costs in light of Menzies' indigency.

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DATED this 30th day of June, 2020.

Respectfully submitted,

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