

FILED
Court of Appeals
Division II
State of Washington

NO. 54210-2-11
8/5/2020 11:29 AM

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

STATE OF WASHINGTON,

Respondent,

v.

JOHN H. HANN,

Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF
CLALLAM COUNTY, STATE OF WASHINGTON
Superior Court No. 19-1-00246-05

BRIEF OF RESPONDENT

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I. COUNTERSTATEMENT OF THE ISSUES

1. Whether the trial court did not violate CrR 6.15 by reading the “abiding belief” language in WPIC 1.01 before jury selection because CrR 6.15 does not apply prior to jury selection?
2. Whether, failing to comply with CrR 6.15 would be subject to nonconstitutional harmless error test and the alleged error in this case is harmless because there is no showing of prejudice?
3. Whether the court did not deprive Hann of effective assistance of counsel by failing to provide an opportunity to object prior to the reading of WPIC 1.01 because counsel could still have objected and asked for a limiting instruction to disregard, failure to object was not deficient because the abiding belief language was not erroneous, and there was no prejudice because the court was likely to overrule such an objection and there was no showing the language was reasonably likely to affect the outcome of the trial?
4. Whether the State presented sufficient evidence that Hann caused a fire in a building when the evidence shows the fire occurred outside a studio in the hallway inside the building?

II. STATEMENT OF THE CASE

The State charged John Hann with the crime of Arson in the First Degree for setting a fire or explosion in a building called the Tempest

located at 112 N Albert Street in Port Angeles, Washington on June 15, 2019. RP 103, 114. At trial, a jury convicted Hann as charged. CP 37.

Prior to voir dire, the trial court read the opening comments from WPIC 1.01. RP 69–72. WPIC 1.01 includes a section on reasonable doubt and includes a sentence as follows: “If, after such consideration, you have an abiding belief in the truth of the charge, you are satisfied beyond a reasonable doubt.” RP 71.

Defense counsel, objecting to the abiding belief language in WPIC 1.01, moved for a mistrial before voir dire (RP 73–74) and counsel argued against it again after the parties rested and prior to closing arguments when the court engaged the parties to finalize the jury instructions. (RP 156–57). The trial court denied the motion for a mistrial (RP 74) and also decided to keep the abiding belief language in the finalized reasonable doubt instruction before closing arguments. (RP 157).

The Tempest

The Tempest is owned by Serenity House and was managed by Amber Tatarek. RP 113. The Tempest houses about 12 people in separate studio apartments. RP 114.

Surveillance from June 15, 2019 shows that Hann lit a firework in a can by a fire alarm in the hallway on the second floor of the building setting off the fire alarm and causing the occupants to evacuate the

building and the city fire and police departments to respond. RP 102–03, 130–31, 146; State’s Ex. 8. Linseed oil, a combustible liquid, appeared to be splashed on the wall surrounding the fire alarm. RP 109–10, 118–19, Ex. 4, 5, 6.

A few witnesses described the Tempest building and its layout.

Bryant Kroh, lieutenant paramedic with the Port Angeles Fire Dept. (RP 101) described the Tempest as follows:

Q Can you describe the building at 112 North Albert?

A I believe it was a former hotel. It’s now apartments on that side of things. *We are in and out of there* all the time for similar alarms or medical calls, but yeah, primarily apartments in use.

Q Were there any people around?

A Yes, there was.

Q What were they doing?

A All the occupants had evacuated the building and were standing on Albert Street.

Q Were they just standing around?

A For the most part, yes, yep.

Q So, you get to the scene, you see that there’s not really a lot of smoke or fire at that point, right and there were several occupants standing around, what did you do next?

RP 104.

A So, basically life, safety is always our priority, so we actually want to confirm. Even though I don’t see anything from the outside, *we want to go inside*, confirm what caused the alarm, make sure that there’s no immediate danger to anybody on scene or any of us. So, I went up to annunciator panel which is on the Albert Street side, that tells us which smoke detector or which alarm went off, located that alarm and then I went upstairs. I used the *exterior stairwell* to get up to the second floor to where the cause of the alarm was, right outside apartment 10, I believe.

Q And when you got there what did you see?

A I saw some charring on the wall, some fluid. You could tell it'd splashed against the wall. Now, the walls *in there* are very dirty, but it looked like something had just happened in that area.

MR. STALKER: Objection, speculation.

THE COURT: Overruled.

BY MR. JOHNSON:

Q Could you describe that part of the building?

A *It's an interior hallway, outside of the apartment, access and egress for the second floor apartments.*

Q Is it covered?

A Yes.

RP 105 (emphasis added).

Q Okay, so you checked the annunciator in the speaker box, is that right?

A Yes.

Q So, is that connected to the fire alarm?

A Yes.

Q All right. Would you actually consider that part of the alarm?

A Yes.

Q So, after you checked that box where did you go next?

A *Back outside.*

RP 106–07.

Amber Taterk, Property Manager at Serenity House and the

Tempest (RP 113) testified as follows:

Q And do you have any familiarity with the surveillance system at the Tempest?

A Yes.

...

Q And where are the cameras located?

A In various locations, so we can catch down each of the hallways, the stairwell, the office and some of the outside.

RP 115.

A This is the location of our camera.

Q All right and it's one yellow door, looking north?

A Correct.

Q Where is that?

A That is on the first floor, *right inside* of the south entry door.

RP 121.

“That is the *interior staircase* also going to the second floor.” RP

122.

Q Does Serenity House have a procedure when there's a fire alarm?

A Yes, typically everybody would exit the building.

Q And why is that?

A For safety, so the building could be cleared.

RP 123.

A I contacted Lieutenant Kroh who was there. He had what they call a utility truck. There was a fire alarm that had gone off, several residences were outside, the building had been evacuated and I conferred with Lieutenant Kroh.

RP 131.

Officer Luke Brown, Port Angeles Police Dept. described the building as follows:

Q So, Officer Brown, where was that garbage can where the linseed oil can was?

Q So, the building faces east. There's a stairwell on the northern side. There's an entrance on the southern side, there's an entrance on the northern side which is a stairwell. At the bottom of that stair there's a garbage can and it's right in that area.

RP 132.

Thank you. So, after you saw the linseed oil can what did you do next?

A Lieutenant Kroh walked me up to the second floor. Room ten was where the fire alarm was located and he showed me where he believed the can had been lit and had exploded.

Q And what did you do at that point?

A Well, when I got up there I noticed several things. I could smell the linseed oil on both walls in front of room ten, which is kind of kitty corner off -- it's a short hall, off the main hall. The fire alarm was up high. I could see the black marking on the wall and this is the fire alarm that Lieutenant Kroh told me had been set off.

RP 133.

A I believe I photographed the area to document what I saw, the charring, the black marks, the condition of the room or the hallway, I should say.

Q Officer Brown, I'm handing what's been marked -- oh, let me show this to counsel, my apologies.

MR. STALKER: I have seen them.

MR. JOHNSON: You don't need them, okay.

BY MR. JOHNSON:

Q Marked for identification purposes as plaintiff's exhibits four through six, do you recognize what I've handed to you?

A Yes, sir, I do.

Q What have I handed to you?

A I didn't hear you, sir?

Q What have I handed to you?

A These are the pictures I took above the fire alarm and it shows the linseed oil on the walls and the black marking.

Q And do those photographs accurately depict what you saw on June 15th, 2019?

A What I saw, yes, sir.

RP 134.

Q Okay. Do you recognize, not the location that's depicted, do you recognize where this still, what physical...

A This is the second floor of the Tempest. This might be the first floor. It's looking north. There's a first floor, a second floor. I

believe we're looking at the first floor, because that's the doorway out that's on the south side. You can see the stairway there.

RP 136.

III. ARGUMENT

A. **CrR 6.15 APPLIES WHEN FINALIZING THE JURY INSTRUCTIONS AFTER THE CLOSE OF EVIDENCE AND BEFORE CLOSING ARGUMENT, NOT BEFORE THE JURY IS SELECTED.**

(c) Objection to Instructions. Before instructing *the jury*, the court shall supply counsel with copies of the proposed numbered instructions, verdict and special finding forms. The court shall afford to counsel an opportunity in the absence of the jury to object to the giving of any instructions and the refusal to give a requested instruction or submission of a verdict or special finding form. The party objecting shall state the reasons for the objection, specifying the number, paragraph, and particular part of the instruction to be given or refused. The court shall provide counsel for each party with a copy of the instructions in their final form.

(d) Instructing the Jury and Argument of Counsel. The court shall read the instructions to the jury. The prosecution may then address the jury after which the defense may address the jury followed by the prosecutions rebuttal.

(e) Deliberation. After argument, the jury shall retire to consider the verdict. The jury shall take with it the instructions given, all exhibits received in evidence and a verdict form or forms.

CrR 6.15 (Instructions and Argument) (emphasis added).

CrR chapter 6 is entitled "Procedures at Trial" and CrR 6.1 through CrR 6.16 encompasses the procedures at trial in chronological

fashion beginning with CrR 6.1 “Trial by Jury or the Court” and finishing with CrR 6.16 “Verdicts and Findings.”

CrR 6.15, the second to last rule in the chapter, is entitled “Instructions and Argument” and deals with the process of finalizing the jury instructions prior to instructing the jury, closing arguments, and deliberation. Under CrR 6.15(a), each party is required to file and serve upon each other a copy of their proposed jury instructions. Then under CrR 6.15(c), the trial court provides to each party a copy of proposed numbered instructions and provides an opportunity to make objections outside the presence of the jury.

WPIC 1.01 is not an instruction provided by the parties and served upon one another and it is not included in the court’s proposed numbered instructions upon which the parties are to have an opportunity to object to. WPIC 1.01 is also not an instruction that is provided to the jury to take with them for deliberation. CrR 6.15(e). Rather, WPIC 1.01 is information provided to a pool of *prosecutive* jurors when there is, as of yet, no jury. There is no jury until the prospective jurors are selected after voir dire examination under CrR 6.4(b) and then sworn in as a jury under CrR 6.6.

Part 1—*Before Questioning of Prospective Jurors:*

This is a criminal case brought by the [State] [City] [County] [against the defendant,(name of defendant)]. . . .

To the charge[s] of [(name of crime)], the defendant has entered a plea of not guilty. The plea of not guilty means that you, the jury, must decide whether the [State] [City] [County] has proved every element of [the] [each] crime charged. . . .

The defendant is presumed to be innocent. The presumption of innocence continues throughout the entire trial. The presumption means that you must find the defendant not guilty unless you conclude at the end of your deliberations that the evidence has established the defendant's guilt beyond a reasonable doubt.

A reasonable doubt is one for which a reason exists. It may arise from the evidence or lack of evidence. A reasonable doubt is a doubt that would exist in the mind of a reasonable person after fully, fairly, and carefully considering all of the evidence or lack of evidence. *[If, from such consideration, you have an abiding belief in the truth of the charge, you are satisfied beyond a reasonable doubt.]*

The first stage of the trial is jury selection, which is sometimes called voir dire.

The purpose of this process is to make sure that we select a jury that is free from any outside or pre-existing bias that might interfere with the jury's ability to fairly decide the case based on the evidence and the law that you receive in this courtroom. . . .

11 Wash. Prac., Pattern Jury Instr. Crim. WPIC 1.01 (4th ed. 2016),
(Advance Oral Instruction—Beginning of Proceedings, Note on Use)
(emphasis added).

The WPIC 1.01 notes on use expressly point out that WPIC 1.01 is not part of the written instructions on the law:

This is not one of the written instructions on the law. *Part 1 of this instruction is to be read to the jury panel before the jury is selected.* Part 2 is to be read after the jury has been selected. The jurors will already have received a Jurors' Information Guide,

which contains some of this same information. *See* CrR 6.2. This guide is available at www.courts.wa.gov.

Id. (notes on use).

The structure and procedural chronology of CrR chapter 6, the voir dire examination of CrR 6.4(b), and finalizing of instructions and closing argument context of CrR 6.15, the fact that WPIC 1.01 is not a jury instruction included in the court's proposed numbered jury instructions before closing argument, and the notes on use from WPIC 1.01 all make it clear that CrR 6.15 does not apply to the introductory comments in WPIC 1.01 given to prospective jurors prior to jury selection.

Therefore, the court did not error by not following CrR 6.15 out of its proper context before the jury was selected. This Court should affirm the conviction.

B. THE ALLEGED FAILURE TO COMPLY WITH CrR 6.15 WOULD BE NONCONSTITUTIONAL ERROR REQUIRING A SHOWING OF PREJUDICE BEFORE A NEW TRIAL MAY BE GRANTED AND HANN HAS NOT ESTABLISHED PREJUDICE.

A reasonable doubt is one for which a reason exists and may arise from the evidence or lack of evidence. It is such a doubt as would exist in the mind of a reasonable person after fully, fairly, and carefully considering all of the evidence or lack of evidence. *If, from such consideration, you have an abiding belief in the truth of the charge, you are satisfied beyond a reasonable doubt.*

State v. Boyd, 1 Wn. App.2d 501, 521, 408 P.3d 362 (2017) (quoting 11 Washington Practice: Washington Pattern Jury Instructions: Criminal, 4.01 (4th ed. 2016) (WPIC)) (emphasis added).

The reasonable doubt instruction with the language “abiding belief” in WPIC 4.01 has been held constitutional and not erroneous. *State v. Pirtle*, 127 Wn.2d 628, 658, 904 P.2d 245 (1995). Therefore, the trial court’s use of this instructional language is not erroneous. Only the trial court’s alleged violation of CrR 6.15 is at issue.

Violations of court rules, as opposed to constitutional violations, are subject to the nonconstitutional harmless error test which requires the defendant to establish that the error was prejudicial before a new trial may be granted. *See State v. Templeton*, 148 Wn.2d 193, 220, 59 P.3d 632 (2002) (citing *State v. Cunningham*, 93 Wn.2d 823, 831, 613 P.2d 1139 (1980); *State v. Barry*, 183 Wash.2d 297, 304, 352 P.3d 161 (2015) (“The burden . . . depends on whether the error was nonconstitutional (burden on defendant to show prejudice) or constitutional (burden on prosecution to show harmlessness)”)).

“An error is prejudicial if, ‘within reasonable probabilities, had the error not occurred, the outcome of the trial would have been materially affected.’” *Id.* (quoting *State v. Neal*, 144 Wn.2d 600, 611, 30 P.3d 1255 (2001))).

Here, defense counsel objected to the abiding belief language in WPIC 1.01 when moving for a mistrial before voir dire (RP 73–74) and counsel argued against it again when the court engaged the parties to finalize the jury instructions prior to closing arguments as required by CrR 6.15. (RP 156–57). The trial court denied the motion for a mistrial and decided to keep the language in the finalized reasonable doubt instruction before closing arguments. Thus, Hann cannot establish that the trial court would have sustained his objection had the trial court provided an opportunity to object before reading WPIC 1.01 and the abiding belief language *prior* to jury selection. Rather, the record shows the trial court was likely to have overruled the objection and read WPIC 1.01 to the prospective jurors anyway. Therefore, Hann cannot establish that the error was prejudicial.

Moreover, there is no evidence that the use of the abiding belief language had any impact upon the jury’s verdict. In fact, under *Pirtle*, the use of the abiding belief language is not prejudicial because it “does not diminish the definition of reasonable doubt given in the first two sentences” and the instruction adequately defines reasonable doubt. *Pirtle*, 127 Wn.2d at 658; *see also Boyd*, 1 Wn. App.2d at 521 (citing *Pirtle*, 127 Wn.2d at 658; *State v. Bennett*, 161 Wn.2d 303, 317, 165 P.3d 1241 (2007); *State v. Fedorov*, 181 Wn. App. 187, 199–200, 324 P.3d 784

(2014); *State v. Osman*, 192 Wn. App. 355, 371–73, 366 P.3d 956 (2016); *State v. Jenson*, 194 Wn. App. 900, 902, 378 P.3d 270 *review denied*, 186 Wn.2d 1026, 385 P.3d 119 (2016)) (holding that the WPIC 4.01 on reasonable doubt with the “abiding belief” language is proper)).

The defendant has not shown any prejudice from the trial court’s use of the “abiding belief” language in WPIC 1.01. Therefore any error in reading WPIC 1.01 without first allowing the defense the opportunity to object outside the presence of the jury is harmless and the conviction should be affirmed.

C. THE COURT DID NOT VIOLATE HANN’S RIGHT TO EFFECTIVE ASSISTANCE BY RECITING THE ABIDING BELIEF LANGUAGE IN WPIC 1.01 BEFORE JURY SELECTION BECAUSE THE ABIDING BELIEF LANGUAGE IS NOT ERRONEOUS, COUNSEL COULD STILL HAVE OBJECTED, AND THERE WAS NO SHOWING OF PREJUDICE.

Assistance of counsel is ineffective where: “(1) defense counsel’s representation was deficient i.e., it fell below an objective standard of reasonableness based on consideration of all the circumstances; and (2) defense counsel’s deficient representation prejudiced the defendant, i.e., there is a reasonable probability that, except for counsel’s unprofessional errors, the result of the proceeding would have been different.” *State v. Eplett*, 167 Wn. App. 660, 664–65, 274 P.3d 401 (2012) (citing *State v. McFarland*, 127 Wn.2d 322, 334–35, 899 P.2d 1251 (1995)).

Hann argues that the court deprived his counsel of the opportunity to object to the reading of the abiding belief language in WPIC 1.01 to the prospective jurors prior to jury selection which Hann claims is required by CrR 6.15. On this basis, Hann asserts the trial court deprived him of his right to effective assistance of counsel.

This argument fails because the use of the “abiding belief” language in WPIC 1.01 and WPIC 4.01 is not erroneous. *Pirtle*, 127 Wn.2d at 658. Thus counsel’s failure to object to the reading of the reasonable doubt language could not be deemed deficient performance. Moreover, Hann’s counsel was not prevented from objecting prior to or during the reading of the reasonable doubt abiding belief language outlined in WPIC 1.01. Defense counsel could also have asked the court to instruct the prospective jurors to disregard the language. *See State v. Garcia*, 177 Wn. App. 769, 776, 313 P.3d 422 (2013) (“Temporarily exposing the jury to an improper jury instruction was not such a serious irregularity that it could not be cured with a limiting instruction, and the trial court instructed the jury to disregard the instruction because it was the wrong instruction for this case.”).

Thus the Court’s reading of WPIC 1.01, did not interfere with defense counsel’s performance.

Finally, there was no prejudice from the failure to object to a proper instruction because the court would have overruled the objection as it did later when counsel objected to the reasonable doubt language when finalizing the instructions. Hann cannot establish a possibility of a different outcome. Thus, there was no ineffective assistance of counsel and the trial court did not deprive Hann of this right.

Therefore, Hann's claim fails and this Court should affirm the conviction.

**D. VIDEO SURVEILLANCE IN EXHIBIT NO. 8
AND TESTIMONY SHOWS THAT THE ARSON
OCCURRED IN THE BUILDING HALLWAY.**

The to convict instruction no. 4 required the State to prove that the defendant caused a fire or explosion and that the fire or explosion (a) damaged a dwelling or, (b) was in a building in which there was at the time a human being who was not a participant in the crime. CP 46.

Jury instruction no. 9 defines building as follows: “‘Building,’ in addition to its ordinary meaning, includes any dwelling, fenced area or other structure used for lodging persons.” CP 51.

Hann asserts that there was no evidence the fire occurred inside the building. Br. of Appellant at 12.

“Sufficiency of the evidence is a question of law that we review de novo.” *State v. Rich*, 184 Wn.2d 897, 903, 365 P.3d 746 (2016).

“The test for determining the sufficiency of the evidence is whether, after viewing the evidence in the light most favorable to the State, any rational trier of fact could have found guilt beyond a reasonable doubt.” *State v. Kintz*, 169 Wn.2d 537, 551, 238 P.3d 470 (2010) (citing *State v. Engel*, 166 Wn.2d 572, 576, 210 P.3d 1007 (2009)) (emphasis added); *see also State v. Powell*, 62 Wn. App. 914, 916, 816 P.2d 86 (1991) (citing *State v. Baeza*, 100 Wn.2d 487, 490, 670 P.2d 646 (1983)).

“When the sufficiency of the evidence is challenged in a criminal case, all reasonable inferences from the evidence must be drawn in favor of the State and interpreted most strongly against the defendant.” *Kintz*, at 551 (quoting *State v. Salinas*, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992)).

“A claim of insufficiency admits the truth of the State's evidence and all inferences that reasonably can be drawn therefrom.” *Id.* “Circumstantial evidence and direct evidence are equally reliable’ in determining the sufficiency of the evidence.” *Kintz*, at 551 (quoting *State v. Thomas*, 150 Wn.2d 821, 874, 83 P.3d 970 (2004)). “In determining whether the necessary quantum of proof exists, the reviewing court need not be convinced of the defendant's guilt beyond a reasonable doubt, but only that substantial evidence supports the State's case.” *State v. Dejarlais*, 88 Wn. App. 297, 305, 944 P.2d 1110 (1997), *aff'd*, 136 Wn.2d 939, 969 P.2d 90 (1998).

Here, surveillance and photos admitted in evidence showed that the fire and explosion occurred inside the building on the second floor. The surveillance footage clearly shows an individual setting off an explosion on top of the fire alarm which set off the fire alarm inside the hallway of the second floor of the Tempest. Ex. 8 (CH 3 2019-06-14-23-49-01.avi, at 6:52–6:54). This surveillance also shows that an individual came out of his room inside the building after the alarm was activated. *Id.* The ceiling in the hallway has lights and the wall across from the rooms is a window. *Id.*

The surveillance of the first floor also shows that the hallways exist on the inside of the building. People can be seen exiting the building and standing outside.

Furthermore, the jury instruction no. 9, definition of building, includes a building in the ordinary sense, a fenced area, or other structure used for lodging persons. CP 51. The surveillance shows that the fire or explosion occurred inside the bounds of the building.

Testimony of witnesses also establish that the fire occurred inside the building. For instance, when asked to describe the part of the building where the fire occurred, Bryant Kroh, lieutenant paramedic with the Port Angeles Fire Dept. testified, “*It’s an interior hallway, outside of the apartment, access and egress for the second floor apartments.*” RP 105.

After checking the annunciator connected to the fire alarm, Kroh testified he went back outside. RP 106–107.

Amber Taterk, Property Manager at Serenity House and the Tempest (RP 113) testified that the cameras are situated “[i]n various locations, so we can [w]atch down each of the hallways, the stairwell, the office *and some of the outside.*” RP 115. While watching the surveillance, Ex. 8, Taterk described the *interior* staircase going to the second floor. RP 121–22. Taterk also described the fire alarm on the wall on the second floor with something on top of it and somebody coming out of a unit. RP 122. Taterk testified that Serenity House’s fire alarm procedure requires everyone to “exit the building.” RP 123.

Officer Luke Brown, Port Angeles Police Dept. also described the building showing that the fire or explosion occurred inside the building:

Q So, Officer Brown, where was that garbage can where the linseed oil can was?

Q So, the building faces east. There’s a stairwell on the northern side. There’s an *entrance* on the southern side, there’s an *entrance* on the northern side which is a stairwell. At the bottom of that stair there’s a garbage can and it’s right in that area.

RP 132.

Off. Brown also took photos (Exhibits 4, 5, and 6) showing the damage from the fire or explosion by the fire alarm on the second floor.

These exhibits show “charring, the black marks, the condition of the room or the hallway” RP 134.

Off. Brown and Tatarek’s description of the scene of the arson as a hallway, Kroh’s description of the hallway as an interior hallway, the multiple distinctions between inside and outside of the building, and the surveillance showing the arson occurred inside the building are evidence firmly establishing that the fire or explosion occurred inside the building.

Therefore, sufficient evidence supports the conviction and this Court should affirm.

IV. CONCLUSION

The procedures in CrR 6.15 do not apply until after the jury instructions are finalized after the evidentiary part of the trial and before closing arguments. Therefore, the reading of WPIC 1.01 and the abiding belief language without first providing an opportunity to object outside the presence of jury does not violate CrR 6.15. The abiding belief language itself is not erroneous, and therefore, there was no prejudice to Hann.

Finally, the surveillance video in exhibit no. 8 and testimony of witnesses establish that the arson occurred inside the building. Therefore, the evidence was sufficient to support the conviction.

For all the foregoing reasons, this Court should affirm the conviction.

Respectfully submitted this 5th day of August, 2020.

MARK B. NICHOLS
Prosecuting Attorney

A handwritten signature in blue ink that reads "Jesse Espinoza". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

JESSE ESPINOZA
WSBA No. 40240
Deputy Prosecuting Attorney

CERTIFICATE OF DELIVERY

Jesse Espinoza, under penalty of perjury under the laws of the State of Washington, does hereby swear or affirm that a copy of this document was forwarded electronically or mailed to Stephanie Taplin on August 5, 2020.

MARK B. NICHOLS, Prosecutor



Jesse Espinoza

CLALLAM COUNTY DEPUTY PROSECUTING ATTORN

August 05, 2020 - 11:29 AM

Transmittal Information

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Appellate Court Case Number: 54210-2
Appellate Court Case Title: State of Washington, Respondent v. John H. Hann, Appellant
Superior Court Case Number: 19-1-00246-7

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