

No. 33147-4-III

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

STATE OF WASHINGTON,

Respondent,

v.

CHRISTIAN KWAKU GYAMFI,

Appellant.

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

The Honorable Judge Henry Rawson

APPELLANT'S OPENING BRIEF

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A. SUMMARY OF ARGUMENT

The State charged Christian Kwaku Gyamfi with one count of felony violation of a domestic violence no-contact order. Mr. Gyamfi pleaded guilty to this charge.

At sentencing, the trial court sentenced Mr. Gyamfi to the statutory maximum term of confinement, plus 12 months of community custody. The trial court ordered this sentence to run consecutive to any DOC (Department of Corrections) sentence. The trial court also imposed present discretionary legal financial obligations and authorized the imposition of future discretionary legal financial obligations, without considering whether Mr. Gyamfi has the ability or likely future ability to pay legal financial obligations. Mr. Gyamfi did not object to the imposition of the legal financial obligations.

Mr. Gyamfi now appeals, challenging his total term of confinement and community custody, the provision in the judgment and sentence ordering his sentence to run consecutively with any DOC sentence, and the imposition of discretionary legal financial obligations without consideration of his ability to pay.

B. ASSIGNMENTS OF ERROR

1. The trial court erred in imposing a total term of confinement and community custody that exceeds the statutory maximum.
2. The trial court erred by not reducing Mr. Gyamfi's 12 month term of community custody to zero, so that the total sentence did not exceed the statutory maximum, as required by RCW 9.94A.701(9).
3. The trial court erred in ordering Mr. Gyamfi's sentence to run consecutively with any DOC sentence.
4. The trial court erred by imposing present discretionary legal financial obligations and by authorizing the imposition of future discretionary legal financial obligations, including a \$100 domestic violence assessment, \$20.50 sheriff services fees, \$250 fee for court appointed attorney, \$40.00 booking fee, \$250 jury cost, and the potential award of appellate costs, without considering whether Mr. Gyamfi has the ability or likely future ability to pay legal financial obligations.
5. Mr. Gyamfi was denied his constitutional right to effective assistance of counsel when his attorney failed to object to the imposition of discretionary LFOs.

C. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

Issue 1: Whether the trial court erred in imposing a total term of confinement and community custody that exceeds the statutory maximum.

Issue 2: Whether the trial court erred in ordering Mr. Gyamfi's sentence to run consecutively with any DOC sentence.

Issue 3: Whether the trial court erred in imposing present discretionary legal financial obligations and authorizing future discretionary legal without considering whether Mr. Gyamfi has the ability or likely future ability to pay legal financial obligations.

Issue 4: Whether Mr. Gyamfi was denied his constitutional right to effective assistance of counsel when his attorney failed to object to the imposition of discretionary LFOs.

D. STATEMENT OF THE CASE

The State charged Christian Kwaku Gyamfi with one count of felony violation of a domestic violence no-contact order under RCW 26.50.110(5). (CP 98-99). Mr. Gyamfi pleaded guilty to this charge. (CP 27-36, 41-56; RP 16-34).

Mr. Gyamfi was represented by appointed counsel in the trial court. (CP 32, 69-70, 81-83, 90-91; RP 23, 57). An indigency screening form was filed in the trial court. (CP 81-83). In this screening form, Mr. Gyamfi indicated he does not have a job, does not own a house or a car, and has court fines. (CP 82-83).

In November 2014, the trial court sentenced Mr. Gyamfi to 60 months of confinement and 12 months of community custody. (CP 30-31; RP 53, 73). The judgment and sentence includes the following notation: “[n]ote: combined term of confinement and community custody for any particular offense cannot exceed the statutory maximum.” (CP 31).

At sentencing, the State told the trial court:

And Your Honor, I think one thing we should probably address, I do know that when he was arrested he had a DOC [Department of Corrections] warrant. I don't know if there was any sort of DOC imposed sentence or anything like that. I'm wondering if we should -- note in the J & S that this is consecutive or concurrent to any DOC imposed thing -- I don't know if DOC did anything or not but we should probably . . . it should be consecutive.

(RP 59).

The trial court agreed with the State and ordered, as stated in the judgment and sentence, “[t]his sentence shall run consecutively with any DOC sentence (see RCW 9.94A.589(3))” (CP 30; RP 59-60).

The trial court also imposed legal financial obligations. (CP 19-23, 32-33; RP 53, 73). These include discretionary costs of \$660.50 (\$100 domestic violence assessment, \$20.50 sheriff services fees, \$250 fee for court appointed attorney, \$40.00 booking fee, and \$250 jury cost¹) and mandatory costs of \$800 (\$500 victim assessment, \$200 criminal filing fee, and \$100 DNA collection fee). (CP 19-23, 32-33; RP 53, 73). Mr. Gyamfi did not object to the imposition of the legal financial obligations. (RP 35-75).

The trial court ordered Mr. Gyamfi to pay \$50 per month towards his legal financial obligations, starting 60 days after his release from custody. (CP 25, 33, 40; RP 73). The trial court also ordered that “[a]n award of costs on appeal against the defendant may be added to the total financial obligations. RCW 10.73.160.” (CP 33).

The trial court found Mr. Gyamfi indigent for purposes of appeal. (CP 1-8). Mr. Gyamfi timely appealed.² (CP 9-10).

¹ The judgment and sentence was amended, by an agreed order, to change the jury fee owed from \$1,455.04 to \$250. (CP 19-23, 32-33).

² The notice of appeal was filed on January 28, 2015. (CP 9-10). On April 13, 2015, a Commissioner of this Court denied the Court's motion to dismiss the appeal for untimely filing and extended the time for filing the appeal to the date the Okanogan County Superior Court received Mr. Gyamfi's notice of appeal.

E. ARGUMENT

Issue 1: Whether the trial court erred in imposing a total term of confinement and community custody that exceeds the statutory maximum.

Sentencing errors may be raised for the first time on appeal. *See State v. Bahl*, 164 Wn.2d 739, 744, 193 P.3d 678 (2008) (stating that “[i]n the context of sentencing, established case law holds that illegal or erroneous sentences may be challenged for the first time on appeal.”). “The interpretation of provisions of the SRA [Sentencing Reform Act] involves questions of law that we review de novo.” *State v. Winborne*, 167 Wn. App. 320, 326, 273 P.3d 454 (2012) (citing *State v. Jacobs*, 154 Wn.2d 596, 600, 115 P.3d 281 (2005)).

In *In re Personal Restraint of Brooks*, our Supreme Court held that “when the trial court imposes an aggregate term of confinement and community custody that potentially exceeds the statutory maximum, it must include a notation clarifying that the total term of confinement and community custody actually served may not exceed the statutory maximum.” *State v. Boyd*, 174 Wn.2d 470, 472, 275 P.3d 321 (2012) (citing *In re Personal Restraint of Brooks*, 166 Wn.2d 664, 674, 211 P.3d 1023 (2009)). Subsequent to *Brooks*, the following amendment to the SRA became effective:

The term of community custody specified by this section shall be reduced by the court whenever an offender's

standard range term of confinement in combination with the term of community custody exceeds the statutory maximum for the crime as provided in RCW 9A.20.021.

RCW 9.94A.701(9); *see also* Laws of 2009, ch. 375, § 5.

In *Winborne*, the defendant was sentenced to 60 months of confinement and 12 months of community custody following his conviction of felony violation of a domestic violence no-contact order under RCW 26.50.110(5). *Winborne*, 167 Wn. App. at 322. The judgment and sentence included a *Brooks* notation: “the total terms of confinement and community custody must not exceed the statutory maximum sentence of 60 months.” *Id.* at 322-23; *see also Brooks*, 166 Wn.2d at 674.

On appeal, the defendant argued that because he was sentenced to the statutory maximum term of confinement of five years, RCW 9.94A.701(9) required the trial court to reduce his term of community custody to zero. *Id.* at 326. This Court agreed, holding that RCW 9.94A.701(9) no longer permits a sentencing court to make a *Brooks* notation to ensure the validity of a sentence. *Id.* at 322, 327-31. This Court found that RCW 9.94A.701(9) plainly presents a three-step process for the sentencing court to follow: “impose the term of confinement, impose the term of community custody, then reduce the term of

community custody if necessary[.]” *Id.* at 329. This Court then remanded the case for resentencing. *Id.* at 331.

Subsequently, in *Boyd*, our Supreme Court reached the same result when interpreting RCW 9.94A.701(9). *See Boyd*, 174 Wn.2d at 471-73. There, the defendant was sentenced to a term of confinement and a term of community custody that together exceeded the statutory maximum sentence for the crime. *Id.* at 471-72. The judgment and sentence included a *Brooks* notation. *Id.* at 471; *see also Brooks*, 166 Wn.2d at 674.

In reversing and remanding the case for resentencing, the Court held “[t]he trial court here erred in imposing a total term of confinement and community custody in excess of the statutory maximum, notwithstanding the *Brooks* notation.” *Id.* at 473. The Court reasoned that RCW 9.94A.701(9) required “the trial court . . . to reduce [the defendant’s] term of community custody to avoid a sentence in excess of the statutory maximum.” *Id.*

Here, Mr. Gyamfi was convicted of felony violation of a domestic violence no-contact order under RCW 26.50.110(5). (CP 27-36, 41-56, 98-99; RP 16-34). This crime is a class C felony. RCW 26.50.110(5). The statutory maximum for a class C felony is five years, or 60 months. RCW 9A.20.021(1)(c). A community custody term of 12 months is also

authorized for this crime. *See* RCW 9.94A.701(3)(a) (authorizing one year of community custody for an offender sentenced to a crime against persons); RCW 9.94A.411(2) (listing a domestic violence court order violation under RCW 26.50.110 as a crime against persons).

The trial court sentenced Mr. Gyamfi to 60 months of confinement and 12 months of community custody, which totals 72 months. (CP 30-31; RP 53, 73). Thus, the term of confinement and the term of community custody together exceed the 60 month statutory maximum for the crime. *See* RCW 26.50.110(5) (felony violation of a domestic violence no-contact order is a class C felony); RCW 9A.20.021(1)(c) (statutory maximum for a class C felony). Pursuant to RCW 9.94A.701(9), this Court should remand the case for resentencing to reduce the 12 month term of community custody to zero. *See* RCW 9.94A.701(9); *Winborne*, 167 Wn. App. at 322, 327-31; *Boyd*, 174 Wn.2d at 471-73.

Issue 2: Whether the trial court erred in ordering Mr. Gyamfi’s sentence to run consecutively with any DOC sentence.

As acknowledged above, sentencing errors may be raised for the first time on appeal. *See Bahl*, 164 Wn.2d at 744. And, “[t]he interpretation of provisions of the SRA involves questions of law that we review de novo.” *Winborne*, 167 Wn. App. at 326 (citing *Jacobs*, 154 Wn.2d at 600). When interpreting a statute, “[t]he court's fundamental objective is to ascertain and carry out the Legislature's intent, and if the

statute's meaning is plain on its face, then the court must give effect to that plain meaning as an expression of legislative intent.” *Dep't of Ecology v. Campbell & Gwinn, L.L.C.*, 146 Wn.2d 1, 9-10, 43 P.3d 4 (2002).

Here, when sentencing Mr. Gyamfi, following a request by the State, the trial court ordered “[t]his sentence shall run consecutively with any DOC sentence (see RCW 9.94A.589(3))” (CP 30; RP 59-60).

RCW 9.94A.589(3) provides:

[W]henever a person is sentenced for a felony that was committed while the person was not under sentence for conviction of a felony, the sentence shall run concurrently with any felony sentence which has been imposed by any court in this or another state or by a federal court subsequent to the commission of the crime being sentenced *unless the court pronouncing the current sentence expressly orders that they be served consecutively.*

RCW 9.94A.589(3) (emphasis added).

This Court interpreted this provision as “giv[ing] a sentencing judge the discretion to impose either a concurrent *or* consecutive sentence for a crime that the defendant committed before he started to serve a felony sentence for a different crime. *State v. King*, 149 Wn. App. 96, 101, 202 P.3d 351 (2009) (emphasis in original).

Here, at sentencing, the State told the trial court:

And Your Honor, I think one thing we should probably address, I do know that when [Mr. Gyamfi] was arrested he had a DOC warrant. *I don't know if there was any sort of DOC imposed sentence or anything like that.* I'm wondering if we should -- note in the J & S that this is

consecutive or concurrent to any DOC imposed thing -- *I don't know if DOC did anything or not but we should probably . . . it should be consecutive.*

(RP 59) (emphasis added).

RCW 9.94A.589(3) did not permit the trial court to run Mr. Gyamfi's sentence consecutive to any DOC sentence. First, RCW 9.94A.589(3) addresses running the current sentence concurrent or consecutive to another "felony sentence," not a DOC sentence. *See* RCW 9.94A.589(3). Presumably, a DOC sentence would be for a violation of terms of a prior sentence, such a violation of a term of community custody. *See* RCW 9.94B.040 (governing non-compliance with conditions of a sentence). A DOC sentence is not another "felony sentence" as contemplated by the statute. *See* RCW 9.94A.589(3).

Second, assuming, for the sake of argument, that a DOC sentence would be considered another "felony sentence" under this statute, the statute addresses another "felony sentence" that has already been imposed. *See* RCW 9.94A.589(3); *see also King*, 149 Wn. App. at 101. Here, nothing in the record shows a sentence was imposed for a DOC violation. To the contrary, at sentencing, the State did not know whether there was a DOC sentence imposed. *See* RP 59. Thus, at the time of sentencing for the current crime, Mr. Gyamfi was not "serv[ing] a felony sentence for a

different crime[.]" the circumstances under which RCW 9.94A.589(3) applies. *King*, 149 Wn. App. at 101.

Therefore, because the provision was not authorized by RCW 9.94A.589(3), this Court should remand the case for the trial court to strike the provision in the judgment and sentence ordering Mr. Gyamfi's sentence to run consecutively with any DOC sentence.

Issue 3: Whether the trial court erred in imposing present discretionary legal financial obligations and authorizing future discretionary legal without considering whether Mr. Gyamfi has the ability or likely future ability to pay legal financial obligations.

"A defendant who makes no objection to the imposition of discretionary LFOs [legal financial obligations] at sentencing is not automatically entitled to review." *State v. Blazina*, 182 Wn.2d 827, 832, 344 P.3d 680 (2015). Instead, "RAP 2.5(a) grants appellate courts discretion to accept review of claimed errors not appealed as a matter of right . . . [and] [e]ach appellate court must make its own decision to accept discretionary review." *Id.* at 834-35. Mr. Gyamfi requests this Court exercise its discretion under RAP 2.5(a) to decide the LFO issue for the first time on appeal. *See id.*

A court may order a defendant to pay LFOs, including costs incurred by the State in prosecuting the defendant. RCW 9.94A.760(1); RCW 10.01.160(1), (2). "Unlike mandatory obligations, if a court intends on imposing *discretionary* legal financial obligations as a sentencing

condition, such as court costs and fees, it must consider the defendant's present or likely future ability to pay.” *State v. Lundy*, 176 Wn. App. 96, 103, 308 P.3d 755 (2013) (emphasis in original). The applicable statute states:

The court shall not order a defendant to pay costs unless the defendant is or will be able to pay them. In determining the amount and method of payment of costs, the court shall take account of the financial resources of the defendant and the nature of the burden that payment of costs will impose.

RCW 10.01.160(3).

Before imposing discretionary LFOs, the sentencing court must consider the defendant's current or future ability to pay based on the particular facts of the defendant's case. *Blazina*, 182 Wn.2d at 834. The record must reflect that the sentencing judge made an individualized inquiry into the defendant's current and future ability to pay, and the burden that payment of costs imposes, before it assesses discretionary LFOs. *Id.* at 837-39. This inquiry also requires the court to consider important factors, such as incarceration and a defendant's other debts, including any restitution. *Id.* at 838-39.

“[T]he court *shall* take account of the financial resources of the defendant and the nature of the burden that payment of costs will impose.” *Id.* at 838 (quoting RCW 10.01.160(3)). “[T]he court *shall not* order a defendant to pay costs unless the defendant is or will be able to

pay them.” *Id.* (quoting RCW 10.01.160(3)). If a defendant is found indigent, such as if his income falls below 125 percent of the federal poverty guideline and thereby meets “the GR 34 standard of indigency, courts should seriously question that person’s ability to pay LFOs.” *Id.* at 838-39.

The *Blazina* court specifically acknowledged the many problems associated with imposing LFOs against indigent defendants, including increased difficulty reentering society, increased recidivism, the doubtful recoupment of money by the government, inequities in administration, the accumulation of collection fees when LFOs are not paid on time, defendants’ inability to afford higher sums especially when considering the accumulation at the current rate of twelve percent interest, and long-term court involvement in defendants’ lives that may have negative consequences on employment, housing and finances. *Blazina*, 182 Wn.2d at 834-37. “Moreover, the state cannot collect money from defendants who cannot pay, which obviates one of the reasons for courts to impose LFOs.” *Id.* at 837.

Here, the trial court imposed discretionary LFOs without considering Mr. Gyamfi’s current or future ability to pay. (CP 19-23, 32-33; RP 53, 73). The erroneous discretionary LFOs include the \$100 domestic violence assessment, \$20.50 sheriff services fees, \$250 fee for

court appointed attorney, \$40.00 booking fee, \$250 jury cost, and the potential “award of costs on appeal against the defendant” (CP 19-23, 32-33; RP 53, 73). Accordingly, the case should be remanded for resentencing for the sentencing court to make the required inquiry into Mr. Gyamfi’s current and future ability to pay. *See Blazina*, 182 Wn.2d at 839 (setting forth this remedy).

Issue 4: Whether Mr. Gyamfi was denied his constitutional right to effective assistance of counsel when his attorney failed to object to the imposition of discretionary LFOs.

If this Court declines to decide the LFO issue for the first time on appeal (as argued in Issue 3 above), then Mr. Gyamfi was denied his constitutional right to effective assistance of counsel, when defense counsel failed to object to the imposition of discretionary LFOs.

Under the Sixth Amendment, a criminal defendant has the right to effective assistance of counsel. *Strickland v. Washington*, 466 U.S. 668, 685-86, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984). “A claim of ineffective assistance of counsel is an issue of constitutional magnitude that may be considered for the first time on appeal.” *State v. Kylo*, 166 Wn.2d 856, 862, 215 P.3d 177 (2009). The claim is reviewed *de novo*. *State v. Sutherby*, 165 Wn.2d 870, 883, 204 P.3d 916 (2009).

To establish ineffective assistance of counsel, a defendant must prove the following two-prong test:

(1) [D]efense 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. McFarland, 127 Wn.2d 322, 334-35, 899 P.2d 1251 (1995) (*citing State v. Thomas*, 109 Wn.2d 222, 225-26, 743 P.2d 816 (1987)).

Tactical decisions made by counsel cannot serve as a basis for an ineffective assistance of counsel claim. *State v. Grier*, 171 Wn.2d 17, 33, 246 P.3d 1260 (2011).

Here, Mr. Gyamfi was sentenced in November 2014. (RP 35-75). Defense counsel did not object to the imposition of discretionary LFOs. (RP 35-75). This failure to object to the imposition of discretionary LFOs was deficient performance. *See McFarland*, 127 Wn.2d at 334-35 (*citing Thomas*, 109 Wn.2d at 225-26) (setting forth the two-part test for ineffective assistance of counsel); *see also State v. Lyle*, No. 46101-3-II, 2015 WL 4156773, at *2 (Wash. Ct. App. July 10, 2015) (finding the defendant arguably showed deficient performance based upon his trial attorney's failure to object to the imposition of LFOs).

Mr. Gyamfi's sentencing hearing was held after this Court had declined to consider a challenge to discretionary LFOs for the first time on appeal. *See State v. Duncan*, 180 Wn. App. 245, 249-55, 327 P.3d 699 (2014). Thus, defense counsel should have been aware that in order to preserve the issue, he was required to object to the imposition of discretionary LFOs. *See Lyle*, 2015 WL 4156773, at *2; *see also State v. Brown*, 159 Wn. App. 366, 371, 245 P.3d 776 (2011) (stating "[t]rial counsel owe several responsibilities to their clients, including the duty to research relevant law.") (citing *Kyllo*, 166 Wn.2d at 862).

Furthermore, defense counsel's failure to object to the imposition of discretionary LFOs prejudiced Mr. Gyamfi. Had defense counsel objected to the imposition of discretionary LFOs, the result would have been different. *See McFarland*, 127 Wn.2d at 334-35 (citing *Thomas*, 109 Wn.2d at 225-26). Given the evidence of Mr. Gyamfi's financial status in the record, the trial court would not have found a current or future ability to pay discretionary LFOs, and accordingly, could not have imposed them. *See RCW 10.01.160(3)*; *see also CP 32, 69-70, 81-83, 90-91; RP 23, 57*.

In *Lyle*, the court found the defendant did not establish the prejudice prong of his ineffective assistance of counsel claim regarding defense counsel's failure to object to the imposition of discretionary LFOs. *See Lyle*, 2015 WL 4156773, at *2. The court reasoned the

defendant presented some evidence of his financial situation at sentencing, but the evidence was presented in the context of the defendant's request for an exceptional sentence downward, rather than in relation to the defendant's ability to pay. *Id.* Furthermore, the court reasoned "[t]hese facts suggest [the defendant] may be disabled but that he was able to do at least some work as evidenced by the fact that he had been working for several months before the sentencing." *Id.* The court noted that there were no additional facts in the record, such as whether the defendant had additional debt. *Id.* The court found such evidence "would allow us to determine whether the trial court would have imposed fewer or no LFOs if defense counsel had objected." *Id.*

Here, in contrast to *Lyle*, there was evidence of Mr. Gyamfi's financial status in the trial court record. (CP 81-83); *see also Lyle*, 2015 WL 4156773, at *2. Specifically, in the indigency screening form, Mr. Gyamfi indicated he does not have a job, does not own a house or a car, and has court fines. (CP 82-83). Thus, unlike *Lyle*, the trial court record showed Mr. Gyamfi was not working and carried additional debt in the form of court fines. (CP 82-83); *see also Lyle*, 2015 WL 4156773, at *2.

Defense counsel's failure to object to the imposition of discretionary LFOs was not tactical. *See Grier*, 171 Wn.2d at 33. Given Mr. Gyamfi's indigent status and his financial situation, there was no

tactical reason to not object to the imposition of these financial obligations. (CP 32, 69-70, 81-83, 90-91; RP 23, 57). There are many problems associated with imposing LFOs against indigent defendants. *Blazina*, 182 Wn.2d at 834-37.

Mr. Gyamfi has proved the two-prong test for ineffective assistance of counsel. The case should be remanded for resentencing to make the required inquiry into Mr. Gyamfi's current and future ability to pay discretionary legal financial obligations.

F. CONCLUSION

Because the total term of confinement and community custody exceeds the statutory maximum, this Court should remand the case for resentencing to reduce the 12 month term of community custody to zero. This Court should also remand the case for the trial court to strike the provision in the judgment and sentence ordering Mr. Gyamfi's sentence to run consecutively with any DOC sentence.

In addition, this Court should remand the case for resentencing to make the required inquiry into Mr. Gyamfi's current and future ability to pay discretionary legal financial obligations.

Respectfully submitted this 18th day of August, 2015.


Jill S. Reuter, WSBA #38374

/s/ Kristina M. Nichols

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COURT OF APPEALS
DIVISION III
OF THE STATE OF WASHINGTON

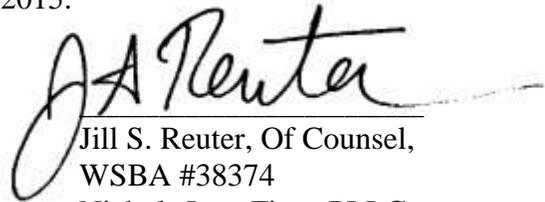
STATE OF WASHINGTON)
Plaintiff/Respondent) COA No. 33147-4-III
vs.)
CHRISTIAN KWAKU GYAMFI)
Defendant/Appellant)
PROOF OF SERVICE)
_____)

I, Jill S. Reuter, of counsel for Nichols Law Firm, PLLC, assigned counsel for the Appellant herein, do hereby certify under penalty of perjury that on August 18, 2015, I deposited for mailing by U.S. Postal Service first class mail, postage prepaid, a true and correct copy of the Appellant's opening brief to:

Christian Kwaku Gyamfi, DOC #853400
Coyote Ridge Corrections Center
PO Box 769
Connell, WA 99362

Having obtained prior permission from the Okanogan County Prosecutor's Office, I also served the Respondent State of Washington by e-mail at bplatter@co.okanogan.wa.us and sfieldlarson@co.okanogan.wa.us using Division III's e-service feature.

Dated this 18th day of August, 2015.



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