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Court of Appeals
Division III
State of Washington

No. 34634-0-III

COURT OF APPEALS, DIVISION III
OF THE STATE OF WASHINGTON

THE STATE OF WASHINGTON, Respondent

v.

KARION H. THOMAS, Appellant

APPEAL FROM THE SUPERIOR COURT
FOR BENTON COUNTY JUVENILE DIVISION

NO. 16-8-00025-7

BRIEF OF RESPONDENT

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I. STATEMENT OF FACTS

On December 11, 2015, Joseph Lizarraga and his wife, Erica Kauffman, left their home in Richland, Washington, to visit his wife's cousin. RP at 19-20. Joseph Lizarraga's son, Ruben Lizarraga, and Ruben Lizarraga's friend, Karion Thomas (hereinafter "respondent"), were at Joseph Lizarraga's house on December 11, 2015. RP at 20. Before leaving his house, Joseph Lizarraga checked with the respondent's mother to make sure the respondent could stay at his house with his son. RP at 20. Joseph Lizarraga and Erica Kauffman left their house for about two hours and arrived home at around 10:30 or 10:45 p.m. RP at 20-21. When Joseph Lizarraga returned to his home, he found his son, Ruben Lizarraga, was throwing a party with several other juveniles. RP at 21-23. Joseph Lizarraga found his son's girlfriend on the couch and the respondent in the kitchen. RP at 21. There were several juveniles in the backyard and Joseph Lizarraga started arguing with his son in the kitchen about him having people over without asking permission. RP at 21-22.

Joseph Lizarraga was angry at his son because his son had been drinking and smoking and had invited several people over without his permission. RP at 22. Joseph Lizarraga began arguing with his son and during the argument his son, Ruben Lizarraga, punched him in the mouth. RP at 22. Joseph Lizarraga responded to his son punching him by hitting

his son back, which knocked his son to the ground. RP at 22. One of Ruben Lizarraga's friends tried to jump on Joseph Lizarraga's back and his wife, Erica Kauffman, intervened and took the friend outside via the front door. RP at 22, 40-41. Ruben Lizarraga then began to fight with his father, Joseph Lizarraga, again and the altercation spilled outside into the backyard. RP at 22. Joseph Lizarraga said his son hit him three more times and then he hit his son back, knocking him down. RP at 22.

Karion Thomas, the respondent, then began threatening Joseph Lizarraga saying he could take him. RP at 26. Joseph Lizarraga became upset and told the respondent to get off his property. RP at 26. Joseph Lizarraga then turned around and the respondent came up behind him, put his arm around his neck, and started choking him. RP at 26. The respondent locked his arm around Joseph Lizarraga's neck and would not let go. RP at 26. The respondent's arm was pressed against Joseph Lizarraga's throat, which obstructed his breathing. RP at 26-28. Joseph Lizarraga felt that if the respondent had kept the choke hold on him, he would have passed out. RP at 28-29.

However, before Joseph Lizarraga passed out, Christopher Darrien Simon was able to drag the respondent off of Joseph Lizarraga. RP at 28. Joseph Lizarraga believed the choking lasted 10-15 seconds. RP at 28. Joseph Lizarraga's breathing was restricted during those 10-15 seconds,

and he felt weak and winded. RP at 29-30. Erica Kauffman was not present during the incident where the respondent put his arm around Joseph Lizarraga's neck in a choke hold, but she did come into the backyard shortly after the respondent had stopped choking him. RP at 41. Erica Kauffman saw her husband bent over with his hand on his chest and he appeared winded. RP at 41. Erica Kauffman saw the respondent jumping around like a boxer saying, "I know I can take you. I'm stronger than you." RP at 30, 43. Erica Kauffman decided to call 911 and both the respondent and the other juveniles at the house fled before police could arrive. RP at 31-32.

At trial on June 7, 2016, Richland Police Department Officer John Raby testified he was the investigating officer who took the initial reports from Joseph Lizarraga and Erica Kauffman on December 11, 2015. RP at 5-6. After Officer Raby's testimony, defense attorney Danielle Purcell specifically asked that Officer Raby not be released from his subpoena but that he stay under subpoena to be later called as a rebuttal witness. RP at 11. Joseph Lizarraga testified he filled out a witness statement about the incident the day after it happened on December 12, 2015. RP at 32-33. Defense counsel questioned Joseph Lizarraga at length about whether he could see the person who choked him since the person choked him from behind. RP at 34-36. During cross examination, defense counsel asked

Joseph Lizarraga several questions about the incident between him and the respondent, including whether he saw the color of the arm choking him, the clothes of the person choking him, etc. RP at 34-35. Defense counsel also asked Joseph Lizarraga if he had reported to Officer John Raby that the respondent, Karion Thomas, had choked him, and Joseph Lizarraga responded that he believed he did. RP at 35-36. On cross examination, defense counsel also repeatedly questioned Erica Kauffman on if she had seen the respondent "physically touching" her husband, Joseph Lizarraga. RP at 46-47. Defense counsel also questioned Erica Kauffman about whether she and Joseph Lizarraga reported to Officer Raby that the respondent had choked Joseph Lizarraga. RP at 46.

Later at trial, Christopher Darrien Simon was called as a witness. RP at 47. Christopher Darrien Simon testified he was friends with the respondent, has known him for two years, and did not want to see his friend, the respondent, get into any trouble. RP at 48, 51-52. Christopher Darrien Simon also testified that the respondent, Karion Thomas, was not outside during the altercation between Joseph Lizarraga and his son. RP at 49. Christopher Darrien Simon stated the respondent did not come outside until the aftermath of the fight and that he held the respondent back from trying to go after Joseph Lizarraga. RP at 50. Christopher Darrien Simon

stated the respondent did not touch or assault Joseph Lizarraga in any way. RP at 51.

After the State rested, defense counsel orally motioned for the court to dismiss the charge for insufficient evidence. RP at 61. Defense counsel argued that because no one had testified they had seen the respondent do anything, there was insufficient evidence to move forward with the case. RP at 61. Defense counsel further argued that because Joseph Lizarraga did not see the person choking him when the person choked him from behind, there was insufficient evidence to proceed past the State's case-in-chief. RP at 61. The Honorable Judge Vic VanderSchoor denied defense counsel's motion to dismiss. RP at 63.

Defense counsel then recalled Officer John Raby as a rebuttal witness. RP at 63. Defense counsel asked Officer Raby if it is standard practice to put everything that he observes in his reports. RP at 63. Defense counsel further asked if Joseph Lizarraga and Erica Kauffman had mentioned anything about the respondent choking Joseph Lizarraga. RP at 64. Officer Raby answered he did not recall Joseph Lizarraga or Erica Kauffman telling him the respondent had choked Joseph Lizarraga. RP at 64.

After the defense rested, the State recalled Joseph Lizarraga as a rebuttal witness. RP at 66-67. During rebuttal testimony, Joseph Lizarraga

testified he filled out his statement about the assaults by his son and Karion Thomas, the respondent, on December 12, 2015. RP at 68-69. Joseph Lizarraga read a portion of his statement into the record as rebuttal evidence. RP at 69. Joseph Lizarraga read, "Karion Thomas grabbed me and choked me, [held] me and started choking me and another boy, [Darrien] had grabbed Karion to get him off of me." RP at 69.

In closing, the defense repeatedly argued that we have no idea who assaulted Joseph Lizarraga because no one, including Joseph Lizarraga, testified they saw the assault. RP at 73-74. The defense further argued even Joseph Lizarraga did not see the assault because his back was turned when someone assaulted him. RP at 73. Defense also argued repeatedly that Joseph Lizarraga's statements were inconsistent because Officer Raby testified Joseph Lizarraga did not tell him he was choked by the respondent on the date of the incident, and that it did not make sense that Joseph Lizarraga would not tell the investigating officer he had been choked if it had actually happened. RP at 75. Defense argued that Joseph Lizarraga's writing out a statement of what happened a day later was inconsistent with what Officer Raby said he was told by Joseph Lizarraga on the date of the incident. RP at 75. Finally, defense counsel specifically focused on Christopher Darrien Simon's testimony. RP at 78. Defense specifically argued Christopher Darrien Simon was the only one who

testified that he had seen anything and that he testified he never saw the respondent touch Joseph Lizarraga. RP at 78. And, in fact, Christopher Darrien Simon testified he held the respondent back during the altercation, so it was impossible for him to have assaulted Joseph Lizarraga. RP at 78.

III. ARGUMENT

A. Whether there was ineffective assistance of counsel for failing to raise the defense of defense of others.

Under the sixth amendment to the United States Constitution and article I, section 22 of the Washington State Constitution, a defendant is guaranteed the right to effective assistance of counsel in criminal proceedings. *Strickland v. Washington*, 466 U.S. 668, 684-86, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984); U.S. Const. amend. VI; Wash. Const. art. I, § 22. To establish ineffective assistance of counsel, the appellant must show that (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. Thomas*, 109 Wn.2d 222, 225-26, 743 P.2d 816 (1987) (applying the two-prong test in *Strickland v. Washington*, 466 U.S. 668). Reasonable probability is defined as "a probability sufficient to

undermine confidence in the outcome." *Strickland*, 466 U.S. at 694. The court gives great deference to counsel's performance, and there is a strong presumption that counsel was effective. *Id.* at 689-90; *State v. Jeffries*, 105 Wn.2d 398, 418, 717 P.2d 722 (1986).

Where a defendant claims ineffective assistance based on counsel's failure to assert a defense, the defendant must show (1) the absence of legitimate strategic or tactical reasons support the challenged conduct, *State v. McFarland*, 127 Wn.2d 322, 336, 899 P.2d 1251 (1995); (2) whether the defendant was even entitled to the defense, *State v. Kruger*, 116 Wn. App. 685, 690-92, 67 P.3d 1147 (2003); and (3) that the result of the trial would have been different had the evidence not been admitted, *State v. Hendrickson*, 129 Wn.2d 61, 80, 917 P.2d 563 (1996).

To raise the defense of self-defense or defense of others, there must be evidence that (1) the defendant subjectively feared he or another was in imminent danger of injury, or (2) this belief was objectively reasonable, *State v. Janes*, 121 Wn.2d 220, 238, 850 P.2d 495 (1993); (3) the defendant exercised no greater force than was reasonably necessary, *State v. Hendrickson*, 81 Wn. App. 397, 400, 914 P.2d 1194 (1996); and (4) the defendant was not the aggressor, *State v. King*, 24 Wn. App. 495, 501, 601 P.2d 982 (1979). RCW 9A.16.020(3). Further, the defendant cannot argue both general denial and self-defense (defense of others) at

the same time because both defenses are mutually exclusive. *State v. Aleshire*, 89 Wn.2d 67, 568 P.2d 799 (1977); *see also State v. Callahan*, 87 Wn. App. 925, 943 P.2d 676 (1997). "One cannot deny that he struck someone and then claim that he struck them in self-defense." *Aleshire*, 89 Wn.2d at 71. The defendant was not entitled to an instruction of self-defense because he denied the underlying act that was the basis for the charge of assault. *State v. Gogolin*, 45 Wn. App. 640, 643-44, 727 P.2d 683 (1986).

First, looking at all the facts presented at trial, it is clear defense counsel's decision to proceed with a defense of general denial rather than defense of others was a legitimate trial strategy and was not ineffective assistance of counsel. At trial, Christopher Darrien Simon testified the respondent never touched Joseph Lizarraga. RP at 51. Officer John Raby testified he was never told anything about the respondent choking Joseph Lizarraga on the night he responded to Joseph Lizarraga's house. RP at 63-64. And defense counsel repeatedly argued that no one actually testified they saw the respondent choke Joseph Lizarraga and that Joseph Lizarraga testified he only felt the arm around his neck from behind after arguing with the respondent. RP at 73-78. Coupled with the fact that based on the evidence presented at trial the defense could not argue both general denial and defense of others, it is clear defense counsel's decision to

proceed with general denial was a legitimate trial strategy supported by facts and evidence. Case law is clear that a respondent cannot claim he did not assault someone, but if he did it was in self-defense or defense of others. *Aleshire*, 89 Wn.2d at 71. They are mutual exclusive and inconsistent defenses that cannot be raised together. *Gogolin*, 45 Wn. App. at 643-44. The respondent argues *State v. Huddleston*, 80 Wn. App. 916, 912 P.2d 1068 (1996), shows that defense of others could be claimed simultaneously with another defense. Brief of Appellant at 6-7. However, *State v. Huddleston* is a case where the defense claimed by the defendant was mistaken identity and there was a question on appeal about whether mistaken identity and defense of others could be claimed at the same time. *Huddleston*, 80 Wn. App. at 920-27. The facts in the respondent's case can at best only support general denial or defense of others, making it legally impossible to claim both defenses, unlike the facts in *Huddleston*. *See Aleshire*, 89 Wn.2d at 71. Given the evidence presented at trial, it is clear the respondent asserted the defense of general denial as a legitimate strategic and tactical decision, and that based on the record and case law the respondent could not claim both general denial and defense of others as defenses.

Second, there was not sufficient evidence to even raise defense of others as a defense at trial. In order for self-defense or defense of others to

be raised as a defense, there must be a prima facie showing the defendant believed he or another was in imminent danger of injury and the defendant cannot be the aggressor. *Janes*, 121 Wn.2d at 238; *King*, 24 Wn. App. at 501; RCW 9A.16.020(3). In this case, the evidence presented at trial shows that after Joseph Lizarraga knocked his son down, the respondent got in his face and began yelling at him that he could take him. RP at 26. Joseph Lizarraga responded by telling the respondent to get off his property and then turned away from the respondent. RP at 26. When Joseph Lizarraga turned around and put his back to the respondent, the respondent immediately put his arm around his neck and choked him. RP at 26-28. Even if the defense thought it was a sound strategy to argue that the testimony by Christopher Darrien Simon (that the respondent did not touch Joseph Lizarraga) was false, to argue the respondent was acting to protect his friend, Ruben Lizarraga, when the respondent strangled Joseph Lizarraga is not supported by the evidence. RP at 50-51. First, there was no imminent threat to Ruben Lizarraga. Ruben Lizarraga had already been knocked to the ground and the respondent was now arguing and yelling at Joseph Lizarraga after the altercation between Joseph Lizarraga and Ruben Lizarraga took place. RP at 26-28. Second, the statements the respondent made both before and after he strangled Joseph Lizarraga do not support the contention that the respondent acted to protect his friend.

RP at 26, 30, 43. Before the respondent strangled Joseph Lizarraga, he was heard yelling that he could take him, and after the respondent strangled Joseph Lizarraga both Joseph Lizarraga and Erica Kauffman testified the respondent was jumping around like a boxer saying, "I know I can take you. I'm stronger than you." RP at 26, 30, 43. At no time during the altercation or after did anyone at trial testify the respondent made any statements about acting to protect his friend. Third, based on the respondent's words and conduct he was clearly the aggressor in the assault against Joseph Lizarraga and he was not entitled to the defense of self-defense or defense of others. RP at 26, 30, 43. Given the facts presented at trial, it is clear that even if defense counsel had asked for the defense of defense of others, they would not have gotten it because the evidence did not support a prima facie showing of defense of others.

Third, the result at trial would not have been different even if the respondent had opted to proceed with the defense of defense of others rather than general denial. As stated above, the evidence presented at trial shows the respondent assaulted Joseph Lizarraga after the altercation between Joseph Lizarraga and Ruben Lizarraga was over and after he had argued with Joseph Lizarraga. RP at 26-28. Further, all the statements made by the respondent, which were presented as evidence, show the respondent was more concerned with letting everyone know he could

"take" Joseph Lizarraga and that he was "stronger" than Joseph Lizarraga than he was with protecting Ruben Lizarraga. RP at 26, 30, 43. Even if this Court finds there was no legitimate trial tactic in deciding to assert general denial over defense of others, the outcome at trial would not have been different. *Hendrickson*, 129 Wn.2d at 80. If there was any error in not asserting the defense of defense of others, it was clearly harmless error. *Id.* In the light most favorable to the defense, there is no question that the trial court would have still found the respondent guilty of Assault in the Second Degree if he had asserted the defense of defense of others instead of general denial.

Therefore, this Court should find that trial counsel was not ineffective and deny the respondent's appeal on the basis of ineffective assistance of counsel.

B. Whether the trial court erred in overruling the respondent's hearsay and improper rebuttal objections to Joseph Lizarraga's and Erica Kauffman's testimony regarding their prior statements to law enforcement and 911 emergency dispatch.

The rebuttal testimony made by Joseph Lizarraga regarding his prior statement made to law enforcement was properly admitted. "'Hearsay' is a statement, other than one made by the declarant while testifying at the trial or hearing, offered in evidence to prove the truth of the matter asserted." ER 801(c).

> A statement is not hearsay if – (1) . . . [t]he declarant testifies at the trial or hearing and is subject to cross examination concerning the statement, and the statement is . . . (ii) consistent with the declarant's testimony and is offered to rebut an express or implied charge against the declarant of recent fabrication or improper influence or motive . . . .

ER 801(d).

> [I]f there is an inference raised in cross examination that the witness changed her story in response to an external pressure, then whether that witness gave the same account of the story prior to the onset of the external pressure becomes highly probative of the veracity of the witness's story given while testifying . . . the proponent of the testimony must show that the witness's prior consistent statement was made *before* the witness's motive to fabricate arose in order to show the testimony's veracity and for ER 801(d)(1)(ii) to apply.

State v. Thomas, 150 Wn.2d 821, 865, 83 P.3d 970 (2004). Finally, a trial court's admission of evidence is reviewed for abuse of discretion and can be reversed "only if no reasonable person would have decided the matter as the trial court did." *State v. McWilliams*, 177 Wn. App. 139, 147, 311 P.3d 584 (2013). And "in nonjury proceedings a new trial ordinarily will not be granted for error in the admission of evidence, if there remains substantial admissible evidence to otherwise support the trial court's findings." *State v. Miles*, 77 Wn.2d 593, 601, 464 P.2d 723 (1970).

At trial, defense counsel elicited testimony from the investigating police officer that the police officer did not recall Joseph Lizarraga or Erica Kauffman telling him the respondent had choked him. RP at 63-65.

Defense counsel elicited testimony and implied that Joseph Lizarraga had changed his statement since the assault had happened. RP at 63-65. Further, defense counsel specifically argued in closing that because Officer Raby did not recall Joseph Lizarraga telling him the respondent had choked him, Joseph Lizarraga's testimony about being choked could not be trusted. RP at 75-76. Under ER 801(d)(1)(ii), the State was properly allowed to and did recall Joseph Lizarraga as a rebuttal witness to read the written statement he made the day after the incident to show that his statement made the day after the incident was consistent with his testimony at trial. RP at 67-69. If the State had not elicited the rebuttal testimony from Joseph Lizarraga about the contents of his written statement to the police and when he had made his written statement, defense counsel would have doubtlessly argued that Joseph Lizarraga had changed his story about what had happened sometime between December 11, 2015, and his testimony on June 7, 2016, and that Joseph Lizarraga had had no prior consistent statements backing up the claim that he had not changed his story. RP at 35-36. Tellingly, the appellant's brief makes no mention of the hearsay exception for prior consistent statement under ER 801(d)(1)(ii) and only refers to the general hearsay rule when discussing Joseph Lizarraga's rebuttal testimony. Brief of Appellant at 7-9.

Finally, the standard to overturn the admission of Joseph Lizarraga's prior consistent statement is abuse of discretion, meaning that no reasonable judge would have admitted Joseph Lizarraga's rebuttal testimony. *McWilliams*, 177 Wn. App. at 147. As shown above, there was clearly a basis to admit Joseph Lizarraga's rebuttal testimony about his prior consistent statement. RP at 63-64, 66-69, 75. But even if there was not, the trial judge clearly stated he was only viewing said testimony as rebuttal evidence, and there was more than sufficient evidence outside of the rebuttal testimony to convict the respondent of Assault in the Second Degree via Strangulation beyond a reasonable doubt. RP at 66-67, 82; *see also Miles*, 77 Wn.2d at 601.

Therefore, this Court should find Joseph Lizarraga's rebuttal testimony was properly admitted at trial and deny the respondent's appeal.

III. CONCLUSION

The State respectfully requests this Court affirm the respondent's conviction.

RESPECTFULLY SUBMITTED this 12th day of June, 2017.

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CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that on this day I served, in the manner indicated below, a true and correct copy of the foregoing document as follows:

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☒ E-mail service by agreement was made to the following parties:
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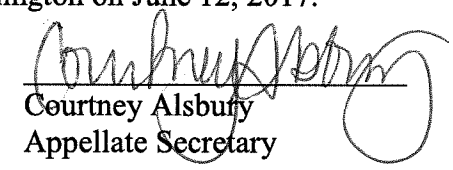
Signed at Kennewick, Washington on June 12, 2017.



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