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Court of Appeals  
Division III  
State of Washington  
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36047-4-III

THE COURT OF APPEALS OF THE STATE OF WASHINGTON  
DIVISION THREE

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STATE OF WASHINGTON,

Respondent,

v.

JAMES NATHEN DOLLARHYDE,

Appellant.

---

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

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REPLY BRIEF OF APPELLANT

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## A. ARGUMENT

### 1. The State presented insufficient evidence of failure to register as a sex offender.

The State presented insufficient evidence that Mr. Dollarhyde is guilty of the offense of failure to register as a sex offender and the State failed to prove Mr. Dollarhyde knowingly failed to comply with a registration obligation. Br. of Appellant at 15-34. First, the State failed to establish the registration statute criminalizes a registrant's failure to provide the sheriff with an accurate accounting of his previous week's stays. Second, the State failed to establish the sheriff ever requested an accurate accounting from Mr. Dollarhyde. Third, the State failed to establish any failure to comply with reporting requirements was "knowingly."

*a. RCW 9A.44.130 does not criminalize a registrant's failure to comply with a sheriff's request to provide an accurate accounting of his previous week's stays.*

RCW 9A.44.130(6)(b) requires registrants who lack a fixed address to report in person every single week to the county sheriff's office and to "keep an accurate accounting of where he or she stays during the week." In addition, the statute permits but does not require sheriffs to request registrants provide sheriffs with an accurate accounting of where they stayed during the preceding week. *Id.*

The plain language of the statute authorizes sheriffs to request a list of the previous week's stays from homeless registrants when they report weekly. However, the statute does not demand sheriff's request the list from registrants as a statutory reporting obligation. Therefore, the failure to do so is not a criminal violation of the statute. This Court held as much in *State v. Flowers*, 154 Wn. App. 462, 465-66, 225 P.3d 476 (2010).

The State responds that a former version of the statute controlled in *Flowers* and that the legislature has since amended the statute. Br. of Respondent at 5-6. Indeed, Mr. Dollarhyde has already acknowledged that fact. Br. of Appellant at 19-21. However, the change in the statute does not alter the conclusion. Both the former and the current versions controlling weekly reporting requirements for homeless registrants permit but do not demand that sheriffs request and receive the weekly, accurate accounting that the statute requires registrants to maintain. *Compare* former RCW 9A.44.130(6)(b) ("The county sheriff's office may require the person to list the locations where the person has stayed during the last seven days.") *with* current RCW 9A.44.130(6)(b) ("The person must keep an accurate accounting of where he or she stays during the week and provide it to the county sheriff upon request."); Br. of Appellant at 19-21.

Because the statute “authorizes, but does not require” sheriffs to request information on a registrant’s locations during the previous week, a registrant’s failure to provide the sheriff with a list of his previous week’s stays does not constitute a violation of the statute. *Flowers*, 154 Wn. App. at 466 (affirming dismissal of failure to register charge, even where the registrant did not provide the sheriff with accurate, requested location information following a request). Therefore, a failure “to comply with the sheriff’s requirements” “is not a ‘requirement’ for which noncompliance is a crime” under the statute, and the State failed to prove Mr. Dollarhyde guilty beyond a reasonable doubt. *Id.* This Court should reverse and dismiss.

*b. Even if the failure to provide a requested accounting could constitute a violation of the statute, the State failed to prove beyond a reasonable doubt the sheriff actually requested Mr. Dollarhyde provide his accurate accounting for the relevant time period.*

Even if this Court disagrees and finds the holding of *Flowers* inapplicable to the amended statute, here the State did not prove Mr. Dollarhyde failed to comply with a reporting requirement because the State failed to establish the sheriff’s office ever requested Mr. Dollarhyde provide an accurate accounting of his previous week’s stays for the relevant time period.

The State does not address Mr. Dollarhyde's argument that the form itself does not constitute a request for the previous week's stays and seemingly concedes that issue. The State argues, however, that sheriff office employees Schupe and Hill both requested this information from Mr. Dollarhyde and that the fact that Mr. Dollarhyde provided an accounting proves the sheriff must have requested one. Br. of Respondent at 6-7. The State's argument is circular, and their claims are unsupported by the record.

Sheriff's criminal records technician Lisa Schupe testified she met with Mr. Dollarhyde when he first began registering and discussed the requirements. RP 30. That does not constitute a specific request to provide an accounting of the previous week's stays for the charging period of January 1-31, 2018. In addition, Ms. Hill testified that Ms. Schupe works in a different office on Mondays, the day on which Mr. Dollarhyde reports. RP 22-23. Therefore, it seems Mr. Schupe's interaction with Mr. Dollarhyde was limited to his initial reporting upon his release from prison.

Front desk employee Angel Hill provided similarly vague testimony, stating she did not recall whether she requested Mr. Dollarhyde provide the information as to his previous week's stays for any particular time in January. RP 26. She did testify she requested Mr. Dollarhyde

provide the information on the form, but the form itself does not contain a request for the previous week's stays. RP 26; Br. of Appellant at 23. This evidence does not establish the sheriff requested Mr. Dollarhyde provide an accurate accounting.

Because the State failed to prove the sheriff ever requested Mr. Dollarhyde provide an accurate accounting of his previous week's stays for January 1-31, 2018, the State failed to prove the charge of failure to register beyond a reasonable doubt. Therefore, this Court should reverse and dismiss.

*c. The State failed to prove beyond a reasonable doubt that Mr. Dollarhyde "knowingly" failed to comply with a reporting requirement when he did not include on the sheriff's form that the sheriff's booked him into the sheriff's jail for two days.*

Finally, even if a failure to provide an accurate accounting of a registrant's previous week's stays violates the statute, and even if the sheriff *did* request Mr. Dollarhyde provide such an accounting, the State still failed to prove Mr. Dollarhyde knowingly failed to comply with this requirement. Br. of Appellant at 27-33. The State argues this element was established by either Mr. Dollarhyde's failure to report to the sheriff the two nights he spent in the sheriff's custody or his failure to report several nights he allegedly spent at the Larsen residence. Br. of Respondent at 7-8. This Court should reject both arguments.

The State's position that a registrant's failure to report to the sheriff two night spent in the sheriff's own custody, in the sheriff's own jail, is a knowing failure to comply with the registration requirements is patently absurd. Where Mr. Dollarhyde was in the sheriff's custody, in the sheriff's jail, in the same building where he reports, and where the employees overseeing registration requirements receive a daily list notifying them of all individuals lodged into their custody, the failure to include the sheriff's jail among the list of places stayed the previous week cannot be a knowing, intentional violation of the statute. RP 36-37 (record custodian Schupe testifying she "receive[s] an email every day from the Jail Records Clerk with the list of names on the jail register. And I look every day at my email . . . To see if there is any sex offenders registered with us that are incarcerated at the time.").

The legislature intended the reporting obligations "to aid law enforcement by providing notice of the whereabouts of convicted sex offenders within the law enforcement agency's jurisdiction." *State v. Peterson*, 168 Wn.2d 763, 768, 230 P.3d 588 (2010) (citing Laws of 1990, ch. 3, § 401). This applies to a registrant's whereabouts in the community, not in jail. In *State v. Watson*, the Court considered the legislative purpose in upholding the registration statute against a challenge of constitutional vagueness. 160 Wn.2d 1, 154 P.3d 909 (2007). In rejecting the challenge,

the Court focused on the provisions requiring a registrant to report upon release from custody and how such provisions aid law enforcement in their need to protect communities by knowing where within their jurisdiction sex offenders live. *Id.* at 9-11. The Court contrasted this need to know where registrants are within the community and the resulting registration requirement with the absence of a requirement for registrants to report while in custody and the corresponding lack of a need to know when a registrant is incarcerated. *Id.* at 10-11 (explaining the lack of an obligation to report the fact of present incarceration because “law enforcement does not need to know that a sex offender is reincarcerated in order to protect the community”).

Here, where the court interpreted the statute to require reporting to the sheriff a stay in the sheriff’s own jail, the statute fails to meet its purpose of providing law enforcement with information on where registrants are currently residing in the community. To interpret the statute to require a registrant to provide the sheriff with such notice is absurd. Instead, courts must narrowly interpret penal statutes to avoid “a reading that results in absurd results.” *State v. Delgado*, 148 Wn.2d 723, 727, 733, 63 P.3d 792 (2003) (courts must give penal statutes “a literal and strict interpretation”). The State failed to prove that Mr. Dollarhyde knew that the statutory reporting requirements included an obligation to inform

the county sheriff's office of a two-night stay in that same sheriff's county jail, and the court interpreted the statute in an absurd manner in finding the statute encompassed such conduct.

Although the court also found Mr. Dollarhyde failed to report several nights allegedly spent at the Larson residence, this Court should reject the State's invitation to uphold the conviction based on this evidence alone. Br. of Respondent at 7-8. First, the testimony on this issue was inconsistent, with Ms. Larson's testimony conflicting with her daughter's and with Mr. Dollarhyde denying both of their claims. RP 47, 52, 57-59, 78-79, 84-85. Second, it is clear the court did not understand the statute, apply it properly, or hold the State to its burden of proof.

Finally, to interpret the statute to criminalize the failure to accurately remember and accurately report every picayune detail comes dangerously close to criminalizing a registrant's status as homeless, in violation of the state and federal constitutions. *See, e.g., Martin v. City of Boise*, 902 F.3d 1031, 1035 (2018) (holding city ordinance prohibiting camping violates the Eighth Amendment prohibition against cruel and unusual punishment "insofar as it imposes criminal sanctions against homeless individuals for sleeping outdoors, on public property, when no alternative shelter is available to them"). Such an interpretation mandates unattainable requirements for homeless individuals and effectively

criminalizes a registrant's statutes as homeless. *Cf. State v. Boyd*, 1 Wn. App. 2d 501, 525, 408 P.3d 362 (2017), (Becker, J., dissenting) (noting the weekly in-person reporting requirements for homeless registrants "makes Washington's statute perhaps the most burdensome in the country"), *review denied*, 190 Wn.2d 1008, *cert. denied*, \_\_\_ U.S. \_\_\_, 139 S. Ct. 639 (2018). The Court should reject such an interpretation of the statute.

*d. This Court should reverse Mr. Dollarhyde's conviction with instructions to dismiss the charge with prejudice.*

Insufficient evidence supports Mr. Dollarhyde's conviction for failure to register. First, noncompliance with a sheriff's request to provide an accurate accounting is not a criminal violation of the statute. Second, the State failed to prove beyond a reasonable doubt the sheriff actually made a request for Mr. Dollarhyde's accurate accounting for the dates in question. Finally, the State failed to prove beyond a reasonable doubt Mr. Dollarhyde knowingly failed to comply with his reporting requirements. For all these reasons, the State presented insufficient evidence that Mr. Dollarhyde was guilty of failure to register, and this Court should reverse with instructions to dismiss the charge.

**2. As the State concedes, the court sentenced Mr. Dollarhyde based on an incorrect offender score, requiring remand for resentencing.**

The court sentenced Mr. Dollarhyde to 50 months confinement based on an offender score of nine. CP 15; RP 108. However, Mr.

Dollarhyde's actual offender score is seven. Br. of Appellant at 12-15. An offender score of seven and a seriousness level of two results in a presumptive guideline range of 22-29 months. RCW 9.94A.510.

The State concedes this error and concedes resentencing is required. Br. of Respondent at 4-5. This Court should accept the State's concession, vacate the sentence, and remand for resentencing with a directive to the court to impose a sentence based on the correct offender score of seven. *State v. Tili*, 148 Wn.2d 350, 358, 60 P.3d 1192 (2003) (recognizing appropriate remedy for unlawful sentence based on miscalculated offender score is vacation of sentence and remand for resentencing).

**3. This Court should strike certain conditions of community custody from Mr. Dollarhyde's judgment and sentence.**

The Court imposed multiple conditions of community custody on Mr. Dollarhyde as part of his sentence. Mr. Dollarhyde challenges five of these conditions. Br. of Appellant at 34-40. First, Mr. Dollarhyde challenges conditions (9), (10), (14), and (15) as not crime-related. Second, Mr. Dollarhyde challenges condition (13) as unconstitutionally vague in violation of due process. All five of the challenged conditions are improper and should be stricken.

a. *This Court should strike community custody condition (9), (10), and (14) as not crime-related.*

Mr. Dollarhyde challenges conditions (9), (10), and (14) as unrelated to his crime of conviction: failure to register. Br. of Appellant at 34-37. Condition (10) requires Mr. Dollarhyde to “[s]ubmit to UA/BA as directed by DOC.” CP 27. Condition (14) prohibits Mr. Dollarhyde from using, possessing, or consuming alcohol. CP 27. Condition (9) requires Mr. Dollarhyde “[r]emain within geographic boundar[ies]” as determine by his community custody officer. CP 27.

With respect to conditions (10) and (14), no evidence was presented to suggest Mr. Dollarhyde’s consumption of alcohol or use of a controlled substances in any way contributed to his offense. Even if the court may prohibit the consumption of alcohol, because it is not a crime-related condition, the court may not impose conditions related to the *monitoring* of alcohol or drug use. *State v. Jones*, 118 Wn. App. 199, 207-08, 76 P.3d 258 (2003); *State v. Parramore*, 53 Wn. App. 527, 529, 768 P.2d 530 (1989). In *Jones*, this Court prohibited any condition related to monitoring the defendant’s use of alcohol or drugs where the general prohibition against consumption was not crime related. 118 Wn. App. at 208.

In addition, condition (10), designed to monitor Mr. Dollarhyde's alcohol or drug use by requiring him to submit to random UA/BA testing, violates his right to privacy under the Fourth Amendment and article I, section 7; *State v. Olsen*, 189 Wn.2d 118, 134, 399 P.3d 1141 (2017). This is not a crime-related condition, and it is not narrowly tailored to any rehabilitation related to Mr. Dollarhyde's offense. For these reasons, the condition is improper.

For this reason, and because none of the three conditions are crime-related, this Court should strike the imposition of these conditions.

*b. This Court should strike community custody condition (13) as unconstitutionally vague.*

Mr. Dollarhyde challenges community custody condition (13), stating that Mr. Dollarhyde may “[n]ot frequent playground, parks, schools, or and [sic] location [sic] where children are known to congregate,” as unconstitutionally vague in violation of due process. CP 27; Br. of Appellant at 37-40. The State addresses this issue in a single sentence, declaring without analysis that the condition is not vague. Br. of Respondent at 9. Because the condition does not sufficiently describe the proscribed conduct and is susceptible to arbitrary enforcement, the condition violates the due process clause, and this Court should strike it.

U.S. Const. amend. XIV; Const. art. I, § 3; *State v. Padilla*, 190 Wn.2d 672, 677, 416 P.3d 712 (2018).

The phrase “where children are known to congregate” is unconstitutionally vague in that it fails to sufficiently describe in a manner which people of ordinary intelligence would understand the areas from which a person is prohibited. *State v. Nguyen*, 191 Wn.2d 671, 678-79, 425 P.3d 847 (2018); *State v. Brettell*, 6 Wn. App. 2d 161, 167-68, 430 P.3d 677 (2018). This Court has found the identical phrase unconstitutionally vague in multiple cases. *See, e.g., State v. Wallmuller*, 4 Wn. App. 2d 698, 702-04, 423 P.3d 282 (2018), *review granted*, 192 Wn.2d 1009 (2019); *State v. Irwin*, 191 Wn. App. 644, 652-55, 364 P.3d 830 (2015).

In addition, the phrase “where children are known to congregate” not only fails to provide proper notice of the prohibited conduct but is also unconstitutionally vague because it permits arbitrary enforcement. *Irwin*, 191 Wn. App. at 655. The phrase fails to provide ascertainable standards, and so Mr. Dollarhyde would be at the whim of his community custody officer to determine whether he violated the statute.

The phrase “where children are known to congregate” both fails to sufficiently describe the proscribed conduct and is susceptible to arbitrary

enforcement. Therefore, it is unconstitutionally vague, and this Court should strike the condition from Mr. Dollarhyde's judgment and sentence.

*c. This Court should accept the State's concession and strike community custody condition (15).*

Mr. Dollarhyde challenges condition 15, requiring him to “[o]btain a drug and alcohol evaluation and follow through with all recommended treatment.” CP 27. The condition is not crime-related and is therefore impermissible. RCW 9.94A.703(3)(f); Br. of Appellant at 34-37. The State concedes this condition is not crime-related and that it should be stricken. Br. of Respondent at 9. This Court should accept the State's concession and remand with a directive that the court strike this condition of community custody from Mr. Dollarhyde's judgment and sentence.

**4. As the State concedes, this Court should strike the imposition of certain legal financial obligations from Mr. Dollarhyde's judgment and sentence.**

Mr. Dollarhyde was indigent for the duration of the trial and remains indigent on appeal. CP 28-31; Supp. CP 35. Despite his indigency, the court imposed the \$200 criminal filing fee, the \$100 DNA collection fee, and ordered interest accrual on his legal financial obligations (LFOs). CP 19-20; RP 108; Br. of Appellant at 40-42.

The State concedes that the recent amendments to the LFO statutes prohibit the imposition of these costs and that prospective application of these amendments require they be removed from Mr. Dollarhyde's

judgment. Br. of Respondent at 9-10. This Court should accept the State's concession and strike the \$200 criminal filing fee, \$100 DNA collection fee, and interest from Mr. Dollarhyde's judgment and sentence.

**B. CONCLUSION**

Insufficient evidence supports James Dollarhyde's conviction. Therefore, this Court should reverse the conviction and remand for dismissal. In the alternative, the State concedes that the court sentenced Mr. Dollarhyde using an erroneous offender score and an incorrect presumptive guideline range. The State also concedes one of the challenged conditions of community custody and \$300 in LFOs should be stricken from the judgment. In addition, four other conditions of community custody should be stricken. For these reasons, at minimum, resentencing is required.

DATED this 14th day of March 2019.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Huber', written in a cursive style.

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STATE OF WASHINGTON,	)	
	)	
RESPONDENT,	)	
	)	
v.	)	NO. 36047-4-III
	)	
JAMES DOLLARHYDE,	)	
	)	
APPELLANT.	)	

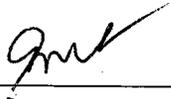
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