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No. 36821-1  
COURT OF APPEALS  
STATE OF WASHINGTON  
DIVISION THREE

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STATE OF WASHINGTON, Respondent,

v.

D.R.C., Appellant.

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BRIEF OF RESPONDENT

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**A. ISSUES RAISED BY ASSIGNMENT OF ERRORS**

1. Was there sufficient evidence of all the elements of misdemeanor harassment?
3. Were D.R.C.'s threats "true threats" unprotected by the Constitutional right to free speech?

**B. STATEMENT OF THE CASE**

On April 22, 2019, the appellant, D.R.C., was convicted by a bench trial of misdemeanor harassment under RCW 9A.46.020(1) and (2)(a). CP 23. The charges stemmed from the following facts:

On the evening of November 28, 2018, Jessica Michelle Berg started sleeping with a knife under her pillow. RP 66, 80. This was the same evening she read text messages about her that were written by her daughter, D.R.C., including some that stated, "Bet imma get her killed if anything," and "Imma fucking kill this bitch." Exs. 1, 2, 4.

Earlier that evening, Ms. Berg and her daughter argued over a red sweatshirt. RP 66. One of the house rules was that D.C.R. could not have red clothing due to its affiliation with gangs. RP 66-7. On November 28, when D.C.R. came home, her mom told her that she removed a red sweatshirt from her room. RP 66. While Ms. Berg was trying to have a conversation with her daughter, D.C.R. went into her room and slammed the door. RP 67. Ms. Berg removed the door. RP 67. D.R.C. was texting on her phone and Ms. Berg took away the phone. RP 67-8. Ms. Berg left

the room because things were escalating. RP 68. D.R.C. hit the wall, leaving a hole in it. RP 68. Ms. Berg called the police and they responded and talked to her and her daughter. RP 68. D.R.C. denied hitting the wall and the officers left. RP 69. Ms. Berg gave D.R.C. her door back for privacy reasons and went to bed. RP 69.

It was then that Ms. Berg read the text messages on her daughter's phone. RP 69. Ms. Berg was up for most of the night. RP 70. Ms. Berg testified that she saw conversations during the argument where her daughter said that "she was going to have me murdered and that she was going to run away." RP 70. She took photographs of some of the messages and gave those to the police. RP 70-1. Exhibits 1, 2 and 4 show D.R.C.'s messages from the night of November 28.

Exhibit one was a text message conversation D.R.C. had with a male named Joshua. RP 75. In the text, D.R.C. called her mom a "dumb fucking cunt" and told Joshua that she was going to get her mom killed. RP 76, Exs. 1, 4. When asked how she felt about the message, Ms. Berg testified that she felt D.R.C. was being serious. RP 76.

In exhibit two, D.R.C. stated, "Imma fucking kill this bitch. She is tryna make me go to my dads." Ex. 2. Ms. Berg had always maintained that if she felt D.R.C. was involved in gangs, that she would send her daughter back to her dad. RP 77.

One screenshot, exhibit three, was from a prior conversation that D.R.C. had about “jumping” a female, “shanking” her with a pencil, slamming her face into a wall, and taking her life. RP 74-5, Ex. 3. Ms. Berg testified that a lot of D.R.C.’s prior conversations were concerning because they indicated past behaviors of her daughter wanting to jump people and get into fights. RP 75. Ms. Berg testified that there were a lot of other messages similar to the ones she photographed. RP 77-8. She dropped off copies of the messages to the police department either the next day or the day after that. RP 81, 85-6.

After finding the messages, Ms. Berg took many steps to protect herself, including sleeping with a kitchen knife under her bed for two nights until she could purchase a taser. RP 79. She also changed all the locks because she did not know if D.R.C. had given a key to anybody. RP 80.

After calling Ms. Berg, the State rested. RP 97. D.R.C. testified that she did not plan on doing anything to her mom and that she was just venting. RP 99-100. She knew that her friends would see the messages. RP 98. D.R.C. testified that while her and her mom were arguing, she was trying to contain her anger. RP 100. She testified:

I was—like, I told myself several times in my head when she was arguing with me that I was not going to hit her. I was not going

to hit her. That's why I was trying to get her to leave my room so I wouldn't hit her, and I succeeded in not hitting her. I would never want to harm my mother.

RP 100. When asked if she ever asked anyone to hurt her mom that night, she testified:

Not necessarily. I was saying that I was going to get her killed; but I never, in fact, messaged anyone saying can you kill my mom?

RP 102. D.R.C. did not call any other witnesses.

The trial court found D.R.C. guilty and sentenced her to 13 days, which was credit for the time she previously served. CP 23, 26. D.R.C. filed a timely notice of appeal.

## C. ARGUMENT

### 1. There was sufficient evidence of all the elements of misdemeanor harassment.

In reviewing a challenge to the sufficiency of the evidence, courts review the evidence in the light most favorable to the State to determine whether *any* rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt. *State v. Green*, 94 Wash. 2d 216, 221, 616 P.2d 628 (1980) (citing *Jackson v. Virginia*, 443 U.S. 307, 319, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979) (emphasis added)). The verdict will be upheld unless no reasonable jury could have found each element

proved beyond a reasonable doubt. *State v. Gentry*, 125 Wn.2d 570, 596-97, 888 P.2d 1105 (1995).

A challenge to the sufficiency of the evidence admits the truth of the State's evidence and all inferences that can reasonably be drawn therefrom. *State v. Theroff*, 25 Wn. App. 590, 599, 608 P.2d 1254, *aff'd*, 95 Wn.2d 385, 622 P.2d 1240 (1980). The evidence is interpreted most strongly against the defendant. *Id.* Evidentiary inferences favoring the defendant are not considered in a sufficiency of the evidence analysis. *State v. Jackson*, 62 Wn. App. 53, 58 n.2, 813 P.2d 156 (1991).

Circumstantial evidence may be used to prove any element of a crime. *State v. Garcia*, 20 Wn. App. 401, 405, 579 P.2d 1034 (1978). "In determining the sufficiency of the evidence, circumstantial evidence is not to be considered any less reliable than direct evidence." *State v. Delmarter*, 94 Wn.2d 634, 638, 618 P.2d 99 (1980).

The relevant elements of misdemeanor harassment are as follows:

- (1) That on or about (date), the defendant knowingly threatened to cause bodily injury immediately or in the future to (name);
- (2) That the words or conduct of the defendant placed (name) in reasonable fear that the threat would be carried out;
- (3) That the defendant acted without lawful authority; and
- (4) That the threat was made or received in the State of Washington.

WPIC 36.07. “Words or conduct” includes, in addition to any other form of communication or conduct, the sending of an electronic communication. RCW 9A.46.020 (1)(b).

RCW 9A.04.110(28)(a) defines “[t]hreat” as “to communicate, directly or indirectly the intent: (a) to cause bodily injury in the future to the person threatened...” This definition does not require direct, verbal communication of a threat. Instead, it encompasses any form of communication, whether direct or indirect, including threats communicated by a third party. *See State v. Vidales Morales*, 174 Wn. App. 370, 488, 298 P.3d 791 (2013) (“The person to whom the threat is communicated may or may not be the victim of the threat.”). The person threatened need not hear of the threat from the defendant so long as the threatened person learns of the threat and, as a result, feared the threat would be carried out. *State v. Kiehl*, 128 Wn. App. 88, 93, 113 P.3d 528 (2005). Put another way, the threatened person simply has to find out that the threat was made, one way or another. *State v. J.M.*, 101 Wn. App. 716, 726, 6 P.3d 607 (2000). And they may learn of the threat at a different time and place than where the threat was communicated. *See id.* at 727.

With the first element, the State needed to prove that D.R.C. knowingly threatened to cause bodily injury immediately or in the future to Ms. Berg. As explained in *J.M.*:

The statute requires that the defendant “knowingly threatens. . .” RCW 9A.46.020 (1)(a)(i). This means that “the defendant must subjectively know that he or she is communicating a threat, and must know that the communication he or she imparts directly or indirectly is a threat of intent to cause bodily injury to the person threatened or to another person.” *J.M.*, 144 Wn.2d at 481. Thus, one who writes a threat in a personal diary or mutters a threat unaware that it might be heard does not knowingly threaten. *Id.* The statute does not require that the State prove that the speaker intended to actually carry out the threat.

Here, the threat was knowingly communicated by way of text messages to two friends. D.R.C. knowingly told Joshua, by text message, “Bet imma get her killed if anything.” Exs. 1, 4. And D.R.C. knowingly texted Lexi, “Imma fucking kill this bitch.” Ex. 2. D.R.C. claims that she did not have subjective knowledge that the texts were a threat to harm. However, D.R.C. admitted that she sent the messages to her friends. RP 98-100. The messages stated that she was going to get Ms. Berg killed and that she was going to kill Ms. Berg. Exs. 1-2, 4. And D.C.R. knew that those friends would see the text messages. CP 98. This was not someone writing in a personal diary or muttering a threat unaware that it might be

heard. Regarding this first element, there was substantial evidence to prove that D.R.C. knowingly communicated a threat to cause Ms. Berg bodily injury in the future.

Regarding the second element, the State must prove that the person threatened, Ms. Berg, was placed in reasonable fear that the threat would be carried out. WPIC 36.07. The person threatened must subjectively feel fear and that fear must be reasonable. *State v. E.J.Y.*, 113 Wn. App. 940, 952-3, 55 P.3d 673 (2002). The record in this case shows that Ms. Berg subjectively felt fear. She changed all the locks on her house, slept with a knife under her bed, bought a taser, and took the messages to the police department. RP 79-80. When asked how she felt about the text messages, Ms. Berg said that she felt D.C.R. was being serious. RP 76. This was substantial evidence that Ms. Berg was placed in fear.

Assuming the evidence establishes a victim's subjective fear, the next issue is whether a rational trier of fact, viewing the evidence in the light most favorable to the State, could have found beyond a reasonable doubt, using an objective standard, that the victim's fear were reasonable. *Id.* The reasonable of such fear was a question for the trier of fact in light of the total context. *State v. Trey M.*, 186 Wash. 2d 884, 906, 383 P.3d 474, 484 (2016). Here, D.R.C. and her mom had just got into an argument about wearing red, a color associated with gang attire. D.R.C.'s mom took

off the door to her room. D.R.C. then texted two friends, indicating that she was going to kill her mom or get her mom killed. Her mom was also aware of other violent messages where D.R.C. talked about “shanking” someone with a pencil and letting them bleed out and die and talked about slamming someone’s face into the wall. Ex. 3. Her mom was so worried about who might have access to her house that she changed all the locks. And after reading the threats, Ms. Berg slept with a knife until she could purchase a taser. Based on the totality of these circumstances, a rational trier of fact, viewing the evidence in the light most favorable to the State, could have found that Ms. Berg’s fear was reasonable.

As to the third element, the State proved that the defendant acted without lawful authority. Here, there was no claim of lawful authority in this case. There are scenarios where one could lawfully threaten injury to another person. *See State v. Smith*, 111 Wash. 2d 1, 9, 759 P.2d 372, 376 (1988). None of them were presented in this case.

As to the fourth element, there was substantial evidence that the acts in this case occurred in the State of Washington. *See* RP 66. In sum, the State submitted sufficient evidence of all four elements of misdemeanor harassment. Accordingly, D.R.C.’s conviction should be affirmed.

**a. The court’s conclusions of law were supported by the record.**

Conclusions of law are reviewed de novo. *Sunnyside Valley Irrigation Dist. v. Dickie*, 149 Wn.2d 873, 880, 73 P.3d 369 (2003). In addition, courts review de novo conclusions of law that are mistakenly characterized as findings of fact. *In re Disciplinary Proceeding Against VanDerbeek*, 153 Wn.2d 64, 73 n.5, 101 P.3d 88 (2004). Finally, courts review the conclusions of law in mixed findings de novo. *Robel v. Roundup Corp.*, 148 Wn.2d 35, 43, 59 P.3d 611 (2002). Courts review the factual aspects of such mixed findings for substantial evidence. *See Burrell v. State (in Re K.S.C.)*, 137 Wash. 2d 918, 925, 976 P.2d 113, 117 (1999).

Conclusion of Law 5

Conclusion of Law 5 states, “The victim’s actions upon learning of the text messages supports the element of reasonable fear.” CP 38. As explained above, based on the totality of these circumstances, a rational trier of fact, viewing the evidence in the light most favorable to the State, could have found that Ms. Berg’s fear was reasonable. After an argument over gang clothing, Ms. Berg’s daughter told two friends that she was going to kill her mom or get her mom killed. Ms. Berg responded by protecting herself from harm and by turning the messages over to the police.

Conclusion of Law 6

Conclusion of Law 6 states, “the State proved beyond a reasonable doubt that the respondent knowingly and without lawful authority threatened to cause bodily injury immediately or in the near future to the victim.” CP 38. As explained above, there was substantial evidence to prove that D.R.C. knowingly communicated a threat to cause Ms. Berg bodily injury in the future. D.R.C. sent the messages and knew that her friends would see them.

Conclusion of Law 7

Conclusion of Law 7 states, “the State also proved beyond a reasonable doubt that the words and conduct used by the respondent placed the victim in reasonable fear that the threat would be carried out.” CP 38. This was amply supported by the record, which demonstrates all the efforts Ms. Berg went to in order to protect herself, including changing all the locks to her house, sleeping with a knife under her bed, purchasing a taser, and making a report to law enforcement. Ms. Berg also testified that she felt D.R.C. was being serious.

Conclusion of Law 8

Conclusion of Law 8 states, “Conclusions of law made on the record during the Court’s oral ruling are incorporated by reference herein.” CP 38. D.R.C. lists this conclusion in her assignments of error but never points to a specific ruling that was made verbally on the record.

An appellant waives an assignment of error when she presents no argument in support of the assigned error. *Cowiche Canyon Conservancy v. Bosley*, 118 Wn.2d 801, 809, 828 P.2d 549 (1992). The court should find that this conclusion of waived because no specific part of the trial court’s oral ruling was challenged in her brief.

Finding of Fact 21

Finding of Fact 21 states “They contained threats to harm the victim.” CP 37. This refers to the text messages mentioned in Finding of Fact 20. This is a conclusion of law. “A conclusion of law erroneously described as a finding of fact is reviewed as a conclusion of law.”

*Willener v. Sweeting*, 107 Wn.2d 388, 394, 730 P.2d 45 (1986). Courts review de novo conclusions of law that are mistakenly characterized as findings of fact. *In re Disciplinary Proceeding Against VanDerbeek*, 153 Wn.2d 64, 73 n.5, 101 P.3d 88 (2004).

As explained above, the record does support this conclusion. The exhibits admitted at trial, exhibits 1, 2, and 4, show that the messages contained threats to harm the victim. Specifically, the threats were threats to kill Ms. Berg.

Finding of Fact 32

Finding of Fact 32 states, “In State’s Exhibit 1 and Defendant’s Exhibit 4, the recipient of the messages, ‘Joshua’ seemed to take the

threats seriously and suggested she tone them down.” CP 38. This is a mixed finding of fact and conclusion of law. Because “[a] conclusion of law is a conclusion of law wherever it appears,” courts review the conclusions of law in such mixed findings de novo. *Robel v. Roundup Corp.*, 148 Wn.2d 35, 43, 59 P.3d 611 (2002). Courts review the factual aspects of such mixed findings for substantial evidence. *See Burrell v. State (in Re K.S.C.)*, 137 Wash. 2d 918, 925, 976 P.2d 113, 117 (1999).

Here, the factual aspect is Joshua’s response to the threat. His response was indicated in the text message, where he said, in response to “...imma get her killed...,” “Who chill just beat her ass that’s it lol.” Ex. 4. He also commented, “Haha dude [n]ows not the time to do that with court coming up and Shit.” Ex. 4. This is substantial evidence for the factual aspect of Finding of Fact 32. The conclusion of law is that Joshua “seemed to take the threat seriously.” That conclusion is supported by the exhibits. Regardless of Joshua’s impression, however, Ms. Berg took the threat seriously, and the State did not have to prove that Joshua took the threat seriously.

**2. D.R.C.’s threats were “true threats” unprotected by the Constitutional right to free speech.**

D.R.C. claims that her text messages were not “true threats.”

Appellant’s Br. 4. The First Amendment provides that “Congress shall

make no law ... abridging the freedom of speech.” U.S. CONST. amend. I. This generally prohibits government interference with speech or expressive conduct. *State v. Knowles*, 91 Wn. App. 367, 373, 957 P.2d 797 (1998). But certain types of speech, such as “true threats,” are not protected. *Id.* A “true threat” is a statement made “in a context or under such circumstances wherein a reasonable person would foresee that the statement would be interpreted . . . as a serious expression of intention to inflict bodily harm upon or to take the life of [another individual].” *Id.* (citations omitted). This is an objective standard. *State v. Johnston*, 156 Wn.2d 355, 360, 127 P.3d 707 (2006).

A true threat is a serious threat, not one said in jest, idle talk, or political argument. *State v. Kilburn*, 151 Wn.2d 36, 43, 84 P.3d 1215 (2004) (citing *United States v. Howell*, 719 F.2d 1258, 1260 (5th Cir. 1983)). Stated another way, communications that “bear the wording of threats but which are in fact merely jokes, idle talk, or hyperbole” are not true threats. *State v. Schaler*, 169 Wn.2d 274, 283, 236 P.3d 858 (2010). Whether a statement is a true threat, or a joke is determined in light of the entire context. *Kilburn*, 151 Wn.2d at 46, 48. Further, “[t]he speaker of a ‘true threat’ need not actually intend to carry it out. It is enough that a reasonable speaker would foresee that the threat would be considered serious.” *Schaler*, 169 Wn.2d at 283 (citation omitted).

Whether language constitutes a true threat is an issue of fact for the trier of fact in the first instance. *State v. Johnston*, 156 Wn.2d 355, 365, 127 P.3d 707 (2006). As explained in *Kilburn*, however, a rule of independent appellate review applies in First Amendment speech cases. An appellate court must make an independent examination of the whole record, so as to assure itself that the judgment does not constitute a forbidden intrusion on the field of free expression. *Kilburn*, 151 Wn.2d at 50. The appellate court is required to independently review only crucial facts -- those so intermingled with the legal question as to make it necessary, in order to pass on the constitutional question, to analyze the facts. *Id.* at 50-51. Thus, whether a statement constitutes a true threat is a matter subject to independent review. *Johnston*, 156 Wn.2d at 365.

In this case, D.R.C. relies heavily on *State v. Kehonen*, 192 Wash. App. 567, 370 P.3d 16, 19 (2016), for her argument that her threat was not a true threat. *See* Appellant's Br. 6-7. However, the facts of *Kehonen* are in stark contrast to the facts at hand here. In *Kehonen*, a juvenile was convicted of misdemeanor cyberstalking for "tweets" about a classmate. 192 Wash. App. at 570. In that case, the defendant, J.K., and another student were both suspended from school after S.G. told a teacher that they were behaving oddly. *Id.* Two years later, J.K. posted a tweet that read "Tbh I still want to punch you in the throat even tho it was 2 years

ago,” followed by the tweet “[S.G.]must die” *Id.* at 571. Later on, J.K. tweeted the word “murder,” which was found to be unrelated to the first two tweets. *Id.* at 572, 583. The next day, I.R., a follower of J.K. showed the tweets to S.G. *Id.* at 571. Importantly, “S.G. testified that she felt angry and embarrassed upon learning of the tweets because she knew that others would see them. She was not frightened, though, because she did not think that J.K. would actually hurt her.” *Id.* at 571-2. S.G. did show the tweets to school administrators, but repeatedly denied that she felt scared or afraid as a result of the tweets. *Id.* at 572, 581. S.G. returned directly to class after leaving the school admin building. *Id.* at 581-2. The court pointed out that “even S.G. ... did not view these tweets as expressing an actual intent to cause physical harm.” *Id.* at 582.

In addition, “not one of the people in J.K.’s intended audience who testified perceived the tweets to be serious threats.” *Id.* at 582.

Furthermore, I.R., the student who showed the tweets to S.G., and the dean and school resource officer who reviewed the them, were never asked whether they perceived the tweets to be serious threats to harm S.G. *Id.* at 581-3. These reactions provided a guide for what constituted a reasonable reaction under the circumstances and therefore, for what reaction a reasonable speaker under the circumstances would have foreseen. *Id.* at 580. Based on this, the trial court concluded that the

tweets were expressions of frustration and that is exactly how they were received. *Id.* at 582. As such, there was insufficient evidence that the tweets were “true threats.” *Id.*

In contrast, here there was substantial evidence that D.R.C.’s threats were taken seriously. D.R.C.’s mom changed all the locks on her house, slept with a knife under her bed, bought a taser, and took the messages to the police department. RP 79-81, 85-6. When asked how she felt about the text messages, Ms. Berg said that she felt D.C.R. was being serious. RP 76. Furthermore, there is some evidence that D.C.R.’s friend, Joshua, took one of the messages seriously. After D.C.R. texted, “Bet imma get her killed if anything,” he responded, “Who chill just beat her ass that’s it lol.” Ex. 1.

D.R.C. also relies on *State v. Locke*, 175 Wn. App. 779, 307 P.3d 771 (2013), asserting that Division Two held that emails involving a former governor “were not true threats since there was no intent by Locke to kill the governor.” Appellant’s Br. 7. But this is an incorrect statement of the holding in *Locke*. The court actually held that there *was* sufficient evidence to support the finding that Locke made a true threat. 175 Wn. App. at 796. As to one of Locke’s emails, the court held that “a reasonable person would foresee that it would be interpreted as a serious expression of harm or to kill another person.” *Id.* at 795-6. In no way did

the *Locke* court hold that that was no true threat because Locke did not intend to kill the governor. To the contrary, caselaw is clear that the First Amendment does not require that the speaker actually intend to carry out the threat in order for a communication to constitute a true threat, and that the State need not prove such intent. *State v. Kilburn*, 151 Wash. 2d 36, 48, 84 P.3d 1215, 1222 (2004).

D.R.C. also relies on *State v. Kilburn* for the proposition that one does not “knowingly threaten” if she writes a threat in a personal diary or mutters a threat unaware that it might be heard.” Appellant’s Br. 5. However, here, D.R.C. did more than that. She communicated the threat to two of her friends by way of a text message. This was not a personal diary and D.R.C. knew that her friends would see and read the texts. RP 98.

D.R.C. claims that there was no intent to harm her mother. Appellant’s Br. 5. However, the First Amendment does not require that the speaker actually intend to carry out the threat in order for a communication to constitute a true threat, and that the State need not prove such intent. *Kilburn*, 151 Wash. 2d at 48.

In sum, using the test our supreme court has repeatedly upheld, a reasonable person in D.R.C.’s place would foresee that her statements

would be interpreted as threats. As such, D.R.C.'s threats were not protected speech under the Constitution.

D.R.C. also challenged conclusion of law number 4, which states, "the State's evidence meets the definition of true threat." CP 38. Conclusions of law are reviewed de novo. *Sunnyside Valley Irrigation Dist. v. Dickie*, 149 Wn.2d 873, 880, 73 P.3d 369 (2003). This conclusion is supported by the court's unchallenged findings of fact, which are verities on appeal. *Gaines*, 154 Wn.2d at 716. Findings of fact 5 through 28 and 32 support this conclusion. There was a heated argument between Ms. Berg and her daughter, after which D.R.C. punched a hole in the wall. CP 50 (Findings 5-14). The victim called the police regarding the hole in the wall. CP 50 (Finding 15). Later that evening, the victim read multiple text message D.R.C. sent to her friends. CP 51 (Findings 20-24). The victim took measures to protect herself and turned the messages over to the police. CP 51 (Findings 25-28). One of the friends D.R.C. texted, Joshua, also seemed to take the threats seriously. CP 52 (Finding 32). As explained above, these were true threats because a reasonable person in D.R.C.'s place would foresee that her statements would be interpreted as threats.

**D. CONCLUSION**

The Court of Appeals decision should be affirmed. There was sufficient evidence to prove all the elements of misdemeanor harassment beyond a reasonable doubt. In addition, every conclusion of law was supported by the record. Furthermore, the threats were “true threats” under Washington’s objective reasonable person standard.

Respectfully submitted this 23rd day of February, 2020,

s/Tamara A. Hanlon  
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DECLARATION OF SERVICE

I, Tamara A. Hanlon, state that on February 23, 2020, via the portal, I emailed a copy of State's Brief of Respondent to Dennis Morgan.

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 23rd day of February, 2020 at Yakima, Washington.

s/Tamara A. Hanlon  
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**YAKIMA COUNTY PROSECUTING ATTORNEY'S OFF**

**February 23, 2020 - 3:35 PM**

**Transmittal Information**

**Filed with Court:** Court of Appeals Division III  
**Appellate Court Case Number:** 36821-1  
**Appellate Court Case Title:** State of Washington v. D.R.C.  
**Superior Court Case Number:** 19-8-00048-2

**The following documents have been uploaded:**

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