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STATE OF WASHINGTON

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NO. 79367-1

79384-1

BY RONALD R. CARPENTER

  
CLERK  
SUPREME COURT OF THE STATE OF WASHINGTON

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STATE OF WASHINGTON,

Respondent,

v.

WILLIAM F. JENSEN,

Petitioner.

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**SUPPLEMENTAL BRIEF OF RESPONDENT**

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A. ISSUES

1. Should Jensen's four convictions for solicitation to commit murder be affirmed where he repeatedly solicited the murders of his wife, daughter, sister-in-law and son, and where those solicitations occurred on different dates, to different people, and involved changing negotiations over the price per victim and a change in the identity of the person who was to carry out the plot?

2. Should Jensen's convictions be affirmed without a retrial where even Jensen's version of events supports multiple convictions for solicitation to commit murder, and where Jensen invited any error by proposing jury instructions adopting the "per victim" approach to the case?

B. FACTS<sup>1</sup>

1. THE STATE'S EVIDENCE AS TO THE SEQUENCE OF CONVERSATIONS.

William Jensen is a former King County Sheriff's Deputy. 13RP 64-69. Jensen married Sue Jensen<sup>2</sup> in 1979, and together they have two

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<sup>1</sup> The statement of facts in this brief will focus on details about the sequence of conversations soliciting murder, and on details about the precise theory of Jensen's trial defense. The facts of the entire case were more fully described in the State's response brief in the Court of Appeals.

<sup>2</sup> Because the defendant and some victims share the same last name, the State will refer to the victims by their first names.

children, Jenny Jensen (nineteen years old) and S.J. (fifteen years old).

9RP 107-08. Sue has a sister named Linda Harms. 9RP 109. In 2001, the couple filed for divorce and matters quickly turned acrimonious. 9RP 111.

In June 2003, Jensen was in custody on harassment and domestic violence-related charges for threatening to kill Sue. He was housed on the eleventh floor of the King County Jail. 9RP 147-48. While in the jail, Jensen met inmate Greg Carpenter. 9RP 147. After speaking to each other for a couple of days, Jensen eventually asked Carpenter for help in solving Jensen's legal and financial problems. 9RP 150-51.

In the first conversation between Jensen and Carpenter, Jensen told Carpenter that he wanted his wife "sniped," meaning shot and killed. 9RP 150-51. Carpenter told Jensen that he thought "sniping" would appear to be the work of an "amateur." Jensen asked Carpenter to devise a better plan for killing his wife. Carpenter told Jensen that he wanted to think about how to best carry out Jensen's desire to have his wife killed. 9RP 150-53.

Another conversation occurred a day and a half later, in which Jensen asked Carpenter to kill both his wife and his sister-in-law. 9RP 151. When Carpenter asked Jensen why he wanted to have his sister in law killed, Jensen explained that the two women had recently inherited a large sum of money. 9RP 63. When Carpenter informed Jensen that his

daughter would likely inherit his wife's money upon her death, Jensen asked for time to mull over whether his daughter should be added to the list of people he wanted killed. 9RP 150-52.

Another conversation between Jensen and Carpenter occurred the next day, in which Jensen added his daughter to the list of people to be killed. 9RP 152. During this conversation, Jensen and Carpenter agreed on a price for the three killings. Jensen agreed to pay Carpenter \$150,000, plus a bonus, if he carried out Jensen's plot to kill his wife, sister in law, and daughter. 9RP 152. Jensen was "tickled pink", when Carpenter informed him that he could make the killings look like an accident. 9RP 153.

Aware that Carpenter was scheduled to be released around July 30<sup>th</sup>, Jensen arranged for Carpenter to collect \$2,500 in front-money from Jensen's sister. 9RP 158. Jensen stressed that he needed to have Carpenter kill the three women by August 1<sup>st</sup> because his trial for his domestic violence charges was scheduled to start on August 4<sup>th</sup> or 5<sup>th</sup>. 11RP 90. Some time shortly after these conversations, Carpenter was released from custody and met, as arranged, with Jensen's sister who gave him an envelope containing \$2,500. 10RP 6.

On July 23, 2003, Carpenter met with Seattle Police Detective Cloyd Steiger and gave him detailed information about Jensen's three

solicitations to kill his family members. 10RP 130. Upon learning this information, Detective Steiger asked detective Sharon Stevens to pose undercover as "Lisa," a purported associate of Carpenter's. 10RP 139.

On July 24, 2003, Detective Stevens went to the King County Jail and talked with Jensen in the visitor's section of the jail. 11RP 79-81.

Detective Stevens introduced herself as "Lisa" and showed Jensen a letter written by Carpenter outlining aspects of the plot to kill Jensen's family. 11RP 82-89. Jensen told Detective Stevens (Lisa) that Carpenter should carry out the plot to kill the three women. 11RP 89-95.

On July 26, 2003, Detective Stevens, once again posing as Lisa, returned to the jail and spoke with Jensen a second time. 11RP 98. This time, their conversation was surreptitiously recorded. 11RP 98-99; Ex. 16 (audio recording); Ex. 23 (transcript).<sup>3</sup> Detective Stevens showed Jensen another letter written by Carpenter. 11RP 103-04. Stevens and Jensen spoke at length about the plot to kill his family, and Jensen expressed concern that Carpenter had previously stated that he was not willing to kill a minor. When Stevens assured Jensen that the person who would carry out the killings would not have a problem with that, Jensen told Stevens to "clean house" and informed Stevens that his son S.J. should also be killed.

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<sup>3</sup> The recording and the transcript have been designated on appeal.

11RP 114-15, 118-21. Jensen agreed to pay an additional sum of money for the killing of his son, essentially taking what was previously a \$50,000 "bonus" for doing the job "right" and transforming that bonus into an automatic additional payment. Ex. 23 at 28-29; 11RP 121. The jury heard this recorded conversation. 11 RP 104-05.

2. JENSEN'S TESTIMONY ABOUT THE SEQUENCE OF CONVERSATIONS.

Jensen testified at trial. In sum, he did not deny that he had multiple conversations with Carpenter and Det. Stevens regarding elimination of his family. Rather, he agreed that he had met with Carpenter multiple times, and with Stevens twice and that the content of those conversations was the murder of his family members. Jensen simply claimed that it was Carpenter, not him, who wanted to kill his family.

As to particulars, Jensen's testimony was at least as specific as Carpenter's. In fact, he claimed to have taken handwritten notes of their conversations. 13 RP 93. The notes were at least 18 pages long. 14RP 73. The notes sometimes designated conversations on separate dates. For instance, four pages of notes were devoted to discussions on July 5<sup>th</sup>, two pages described the conversations on July 6<sup>th</sup>, and one page of notes resulted from July 7<sup>th</sup>. 14RP 84-85.

Jensen confirmed that he met Carpenter in late June or early July. 13 RP 85. He claimed that initially only his wife was to be killed but that he eventually included other family members. 13RP 87, 163, 193. He confirmed that he was angry at his wife while in jail and that Carpenter offered to help him. 13RP 88. Jensen confirmed that Carpenter described his ability to carry out a murder. 13RP 90. He confirmed that Carpenter proposed a detailed, difficult murder plan that involved the drugging of certain victims, that victims would be found at two different houses twenty minutes apart from each other. 14RP 76-78.

He said they initially negotiated a fee of \$30,000 to kill Jensen's wife but that the sum rose to \$90,000 or \$100,000 as victims were added. 13 RP 91, 164, 178; 14RP 74, 85. Down payments of cash and oxycontin were discussed. 13RP 169-72. He confirmed that his sister paid the first down-payment installment. 13RP 170-72. He confirmed that he shared with Carpenter his family's names, ages, general descriptions, hair colors, approximate weights, home addresses, descriptions of houses, home telephone numbers, cell phone numbers, and vehicle information. 13 RP 163.

Jensen claimed that he played along with Carpenter in a type of "reverse sting" so that he could report Carpenter to the authorities and perhaps obtain a deal on his case. 13RP 93; 14RP 90-92. Jensen said that

the multiple conversations with Carpenter were "efforts to lure him in" to a scheme where there was a lot of money to be gained. 13RP 166, 168.

C. ARGUMENT

The State respectfully submits that under the analysis developed in State v. Varnell, the facts of this case show that Jensen committed at least four solicitations to commit murder. Thus, his present convictions do not violate double jeopardy. Still, the State respectfully asks this court to reexamine portions of the Varnell decision in light of authority that was not cited in that case. In particular, the State urges this Court to adopt a rule that recognizes that the object of a solicitation can be an important part in deciding whether separate criminal solicitations have occurred. Finally, because Jensen agreed with much of the State's evidence, and only disputed intent, and because he essentially adopted the State's unit of prosecution analysis in the trial court, remand for retrial is unwarranted.

1. JENSEN COMMITTED AT LEAST FOUR CRIMINAL SOLICITATIONS SO HIS FOUR CONVICTIONS DO NOT VIOLATE DOUBLE JEOPARDY.

This Court was recently presented with the issue of "whether a solicitation in a single conversation to murder four people constitutes a single unit of prosecution of solicitation to commit murder." State v. Varnell, 162 Wn.2d 165, 167, 170 P.3d 24 (2007). Varnell had solicited a co-worker to kill Varnell's wife. The co-worker refused the solicitation

and called police. In a subsequent recorded conversation with an undercover detective, Varnell solicited the murders of his wife, her parents, and her brother. Varnell, 162 Wn.2d at 167. Varnell challenged his multiple convictions stemming from the recorded conversation.

This Court held that only one conviction could flow from that single conversation because "the solicitation to the undercover detective to commit the four murders was made only to the detective, at the same time, in the same place, and for the same motive." Varnell, at 171. The Court reasoned that "[t]he evil the legislature has criminalized is the act of solicitation. The number of victims is secondary to the statutory aim, which centers on the agreement<sup>4</sup> on solicitation of a criminal act." Id. at 169. Thus, "the unit of prosecution is centered on each solicitation regardless of the number of crimes or objects of the solicitation." Id. at 171.

Still, a "factual analysis" is required in any given case because a defendant may be convicted of multiple counts if he engaged in multiple solicitations. Varnell, at 171-72. The factual analysis asks "whether the time, persons, places, offenses, and overt acts were distinct." Varnell, at 171 (citing State v. Bobic, 140 Wn.2d 250, 266, 996 P.2d 610 (2000))

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<sup>4</sup> This statement is technically incorrect. Solicitation to commit a crime requires only a solicitation and an offer to pay; it does not require an agreement. RCW 9A.28.030.

and State v. Walker, 24 Wn. App. 78, 81, 599 P.2d 533 (1979)). So, for example, Varnell was properly convicted of two counts of solicitation: one count for soliciting the co-worker to kill his wife; other counts for soliciting the detective to kill his wife and others. Varnell, at 172. The solicitations were directed at different people on different dates.

Applying that factual analysis here shows that Jensen committed at least four solicitations to commit murder because he had at least five conversations on different dates, with different people, as to different offenses, and involving different "overt acts."<sup>5</sup> Three of those conversations were with Carpenter; two were with Stevens.

First, there were multiple conversations between Jensen and Carpenter, occurring on dates in late June and early July wherein Jensen solicited Carpenter to commit murders. These conversations resulted in at least three distinct solicitations. Early on, Jensen said that he wanted his wife killed; nobody else was mentioned. This initial enticement is a single solicitation for a single "offense" involving a single "overt act," i.e., only one payment or offer to pay was needed. 9RP 150-51.

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<sup>5</sup> It is unclear what this Court meant by "overt act." The only "act" required by the solicitation statute is the act of paying, or offering to pay, for commission of a crime. If the term refers to the "overt act" needed to complete a solicitation, meaning the offer to pay, then a change in the terms of the agreement should indicate a new solicitation. See RCW 9A.28.030 ("...he offers to give or gives money or other thing of value..."). If, however, "overt act" refers to the acts required to commit the crime solicited, then changing or adding a target crime should constitute a new solicitation. As discussed below, this second interpretation of "overt act" requires a reexamination of Varnell.

In a conversation with Carpenter a day and a half later, Jensen added his sister-in-law to the plan. This second conversation was logically distinct from the first because it occurred on a different day, because an additional victim was added, and because the terms of the agreement changed with the increase in victims. In essence, Jensen was offering a new deal. Thus, the second conversation with Carpenter constituted a second, broader "enticement" that was logically distinct from the first solicitation. 9RP 150-52.

The third conversation occurred the following day. During that conversation, Jensen added his daughter to the list of victims because he feared he would not inherit his wife's estate if his daughter survived. 9RP 152. Again, this expansion and renegotiation of the deal logically constitutes a new solicitation. And, as victims were added, the price for carrying out the plot changed, too. 13RP 91, 164, 178; 14RP 74, 85.

The conversation with Det. Stevens on July 24<sup>th</sup> established a fourth solicitation, as it occurred on a different date, and involved a different person, i.e., Det. Stevens, than before. In fact, as far as Jensen knew, Det. Stevens was taking over implementation of the plot since Carpenter had been re-arrested and was unable to carry out the murders. 10 RP 27-31. Thus, Jensen necessarily had to solicit Det. Stevens to implement the plan. The fact that Jensen may have had an overarching

plan does not defeat the fact that Stevens, and not Carpenter, was being solicited to commit the crimes. See State v. Walker, 24 Wn. App. at 81 ("The fact that there is one individual common to separate criminal enterprises or an interrelationship between conspiracies does not necessarily make them a single criminal act.").

Finally, the conversation with Det. Stevens on July 26<sup>th</sup> established a fifth unit of prosecution because Jensen again expanded the scope of the plan when he concluded that it was necessary to kill his son in addition to the other victims. Ex. 23 at 24-29. This change in the proposed contract required a different "overt act" since the payment was altered in consideration of the additional victim. Ex. at 28-30.<sup>6</sup> Thus, the final conversation constituted a separate "enticement" to commit murder.

Although Jensen's convictions should be affirmed based on the Varnell analysis, the State respectfully asks this Court to modify its approach to the issue. Specifically, the State asks this Court to hold that the presence of multiple targets can help to determine whether there was a single solicitation, or multiple solicitations.

Only a few cases have addressed the unit of prosecution for the crime of solicitation to commit murder but those cases have recognized

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<sup>6</sup> A \$50,000 bonus was originally promised if Carpenter "did the job right." Ex. 23 at 28-30. With the addition of the son as a planned victim, that bonus became a fixed term of the contract. Id.

the importance of examining the target of the solicitation. Apparently, the first case to grapple with the question was Meyer v. State, 47 Md. App. 679, 425 A.2d 664 (1981). After being convicted for murder and imprisoned, Meyer solicited an undercover detective to murder his wife. In a subsequent conversation, he asked the detective to kill three other people. The issue presented on appeal was whether he was guilty of one count or four counts of solicitation to commit murder.

The Meyer court held that he was guilty of four counts because specification of individual victims illustrated four distinct solicitations.

We see no reason why, on the one hand, in a single conversation (much less in two separate conversations as occurred here), a person cannot make successive and distinct incitements, each having a separate object; and we therefore reject the notion that merely because there is but one solicitor, one solicitee, and one conversation, only one solicitation can arise. We similarly reject, however, as being equally simplistic, the “per capita” theory that there are necessarily as many solicitations as there are victims.

Meyer, 425 A.2d at 669-70. The Court distinguished solicitation from conspiracy, and explained why the unit of prosecution should be different for each. Id. at 670. The court then explained that the number of victims could be relevant in determining the number of solicitations.

... The number of victims is important only as it may be evidence of the number of incitements. By way of example, an entreaty made by a solicitor to blow up a building in the hope that two or more particular persons may be killed in the blast could be characterized as one solicitation,

notwithstanding that implementation of the scheme might violate several different laws or, because of multiple victims, constitute separate violations of the same law. The multiple criminality of the implementation would not, in that instance, pluralize the incitement, which was singular. That is the thrust of Braverman.<sup>7</sup> But that is quite different from the situation in which the solicitee is being importuned directly to commit separate and distinct acts of murder to kill, individually, several different specified victims possibly at different times and places and by different means and executioners. In the latter case, there is not a single incitement but multiple ones, each punishable on its own.

Meyer, 425 A.2d at 669-70. See also People v. Davis, 211 Cal. App.3d 317, 259 Cal.Rptr. 348 (1989) (solicitation to murder two people constituted two counts -- adopts the "simplistic" per-victim approach rejected by Meyer); People v. Cook, 151 Cal. App.3d 1142, 199 Cal.Rptr. 269 (1984) (solicitation to kill rape victim, her parents, and her friend constituted four counts -- adopts Meyer approach). Cf. People v. Morocco, 191 Cal.App.3d 1449, 237 Cal.Rptr. 113 (4<sup>th</sup> Dist.1987) (solicitation to commit murder of wife and husband at same time and place was one count).

The analysis in Meyer, Davis, and Cook all take into consideration, to varying degrees, the target of the solicitation. That approach is

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<sup>7</sup> In Braverman v. United States, 317 U.S. 49, 63 S. Ct. 99, 87 L. Ed. 23 (1942), the Court held that a single agreement that would violate multiple laws could be punished as only one crime, since the crime was designed to punish the act of entering into a criminal conspiracy.

consistent with State v. Clapp, 67 Wn. App. 263, 834 P.2d 1101 (1992), the only published Washington case to consider multiple counts of solicitation to commit murder. Angry over failed business dealings, Clapp solicited a man named Robinson to kill one or both of his business rivals. He solicited Robinson repeatedly over a period of months; the last solicitation was recorded by police after Robinson reported the plot. The Court of Appeals rejected a sufficiency of the evidence challenge, holding that the jury was entitled to believe that Clapp solicited two murders rather than just one. Id. at 270. Although Clapp did not analyze the unit of prosecution for solicitation, the case clearly presumed that multiple victims could trigger responsibility for multiple counts of solicitation.

Considering each discrete victim is also consistent with the general victim-centered approach to serious violent crimes that is reflected in the Sentencing Reform Act. In In re Orange, 152 Wn.2d 795, 821, 100 P.3d 291 (2004), this court recognized that under former 9.94A.400(1)(b) (1990), a person convicted of two or more serious violent offenses arising from separate and distinct criminal conduct will face consecutive sentences. This Court has also recognized that offenses arise from separate and distinct conduct when they involve separate victims. State v. Wilson, 125 Wn.2d 212, 220, 883 P.2d 320 (1994); State v. Vike, 125 Wn.2d 407, 410, 885 P.2d 824 (1994). And, this Court has recognized

that the unit of prosecution for robbery must focus on the number of separate victims robbed. State v. Tvedt, 153 Wn.2d 705, 107 P.3d 728 (2005). These principles suggest that a proposal to kill multiple people should be punished more severely than a proposal to kill just one person.

Unfortunately, this victim-centered approach is inconsistent with the rationale in Varnell, where this Court held that the object of solicitation is unimportant to the analysis. So, to adopt the Meyer holding, this Court would have to conclude that in this respect the Varnell decision was "clearly incorrect and harmful." In re Stranger Creek, 77 Wn.2d 649, 466 P.2d 508 (1970).

The State respectfully suggests that the decision in Varnell is incorrect and should be overruled, at least that part which says the object of criminal solicitation is unimportant to the unit of prosecution analysis. The question in Varnell was what constitutes multiple criminal solicitations. The answer provided was that the number of criminal solicitations depends on the number of solicitations. Varnell, at 171 (the unit of prosecution "is centered on each solicitation, regardless of the number of crimes or objects of the solicitation."). But, as the Meyer court noted, this type of answer begs the question. Meyer, at 670. A solicitation is criminal only if a crime is solicited. Thus, the logical way to determine

the number of criminal solicitations is to examine the nature and number of the crimes solicited.

The decision also leads to incongruous results that are likely at odds with the intent of the legislature. For instance, under Varnell, four telephone calls on different dates soliciting the murder of one person, but directed to four different people, will be punished as four counts of solicitation to commit murder. This seems proper. But, by contrast, a single telephone call that solicits the murders of four people will be punished as a single count, notwithstanding the far greater harm that will follow if the solicitation is accepted and carried out.

Another anomalous result would follow if a criminal solicits two different crimes. For instance, a person might solicit the murder of one person and the knee-capping of another. Because punishment for solicitation is, like punishment for attempt, tied to the nature of the underlying crime,<sup>8</sup> the defendant would necessarily be liable for two counts of solicitation; one for solicitation to commit murder and another for solicitation to commit assault. Yet, if the same defendant under the same circumstances solicited two murders instead of a murder and an assault, Varnell requires that he be convicted of a single count.

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<sup>8</sup> RCW 9A.28.030(2) refers to RCW 9A.28.020, the attempt statute, to define the punishment.

Such divergent and incongruous results do not advance the purposes of the statute. See generally 2 Wayne R. LaFave & Austin W. Scott, Jr., Substantive Criminal Law § 11.1(b) (2nd ed. 2003) (discussing the purposes of solicitation statutes as being protection of possible victims as well as protection of person solicited). Moreover, considering the object of the crime would not necessarily lead to more counts per case, it would simply make it easier to determine the unit of prosecution, and it would lead to a more intuitive application of the law.

The decision is harmful for two reasons. First, an interpretation of the statute that leads to counterintuitive results diminishes respect for the law. When conduct places several people at risk but the punishment is the same as if a single person were endangered, respect for the law is sacrificed. Second, the Varnell unit of prosecution test will be more difficult to apply, and will result in increased litigation, than would be a rule that focuses on the solicitation to commit a particular crime.<sup>9</sup> Focusing on the number of crimes solicited is a much more direct manner of defining the unit of prosecution than focusing on the number of solicitations, divorced from the object of the solicitation. The latter analysis forces a consideration of much more amorphous distinctions. The

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<sup>9</sup> It is important to note that criminal solicitation applies to all crimes, including property crimes and crimes against victims.

analysis in this case proves as much. Thus, adopting the Meyer-type approach will foster clarity in the law and reduce litigation over the appropriate unit of prosecution for criminal solicitation.

2. JENSEN'S CASE NEED NOT BE REMANDED FOR RETRIAL.

This case is in an odd procedural posture. Jensen never challenged the unit of prosecution in the trial court or in the court of appeals. His petition for review included eight issues but not a unit of prosecution claim. The unit of prosecution issue was essentially raised sua sponte by this Court when the case was stayed pending Varnell. As a result, no appellate record was ever developed as to the manner in which these cases were placed before the jury.

Jensen should not be entitled to a new trial when he never asserted error below. RAP 2.5(a). Even though a unit of prosecution argument is a constitutional double jeopardy claim, any alleged error must be "manifest" to warrant review. RAP 2.5(a)(3). State v. Scott, 110 Wn.2d 682, 686-87, 757 P.2d 492 (1988); State v. Lynn, 67 Wn. App. 339, 342, 835 P.2d 251 (1992). RAP 2.5(a)(3) is not intended to afford defendants a means for obtaining new trials whenever they can identify a constitutional issue not raised before the trial court. Scott, 110 Wn.2d at 688. An error is manifest if it is obvious and directly observable.

As pointed out above, Jensen's own detailed testimony about his multiple conversations with Carpenter embraced the facts necessary to prove at least four solicitations to commit murder. Thus, the facts necessary to support four convictions are undisputed. Under these unique circumstances, it cannot be said that failure to present the case as a "per conversation" case instead of a "per victim" case was manifest error.

Finally, Jensen should not be permitted to argue that the to convict jury instructions were erroneous because he proposed the identical instructions. See Motion to File Additional Clerk's Papers.<sup>10</sup> A party who proposes erroneous jury instructions has invited the error, and will not be heard to complain about the instructions on appeal. State v. Studd, 137 Wn.2d 533, 546, 973 P.2d 1049 (1999).

#### D. CONCLUSION

For the foregoing reasons, the State respectfully asks this Court to affirm Jensen's convictions for solicitation to commit murder, regardless

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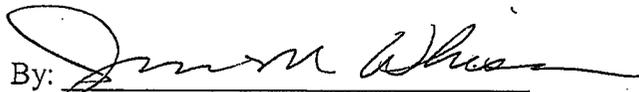
<sup>10</sup> Because Jensen never raised the unit of prosecution claim at trial or in the appellate courts, clerk's papers relevant to that issue were never prepared. Since the issue has now been raised, however, the State has filed a motion to complete the record as to the jury instructions proposed by Jensen. See Motion to Permit Filing of Additional Clerk's Papers.

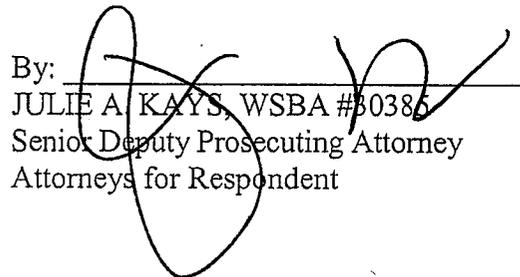
of whether the Court adheres to the Varnell rationale, or adopts the Meyer approach.

DATED this 14<sup>th</sup> day of March, 2008.

Respectfully submitted,

DANIEL T. SATTERBERG  
King County Prosecuting Attorney

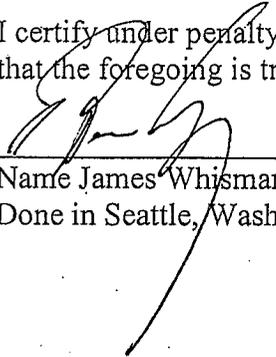
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Certificate of Service by Mail

Today I sent by electronic mail and deposited in the mail of the United States of America, postage prepaid, a properly stamped and addressed envelope directed to Thomas Kummerow, the attorney for the appellant, at Washington Appellate Project, 701 Melbourne Tower, 1511 Third Avenue, Seattle, WA 98101, containing a copy of the Supplemental Brief of Respondent, in STATE V. WILLIAM JENSEN, Cause No. 79384-1, in Supreme Court of the State of Washington.

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

  
Name James Whisman  
Done in Seattle, Washington

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Date ~~3/5/08~~