No. 100779-5
COA No. 83284-1-I

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,
Respondent,

v.

MATHEW McCOLLIAN
Appellant.

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

The Honorable James J. Dixon, Judge
Cause No. 18-1-02231-34

ANSWER TO PETITION FOR REVIEW
AND
CROSS PETITION FOR REVIEW

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A. IDENTITY OF CROSS-PETITIONER

The State of Washington, by and through Joseph J.A. Jackson, Senior Deputy Prosecuting Attorney for Thurston County respectfully requests that if this Court should grant Matthew McCollian's Petition for Review that this Court also accept review of the issue identified in part C of this cross-petition.

B. COURT OF APPEALS DECISION AND STATEMENT OF THE CASE

For purposes of this Answer to Petition for Review/Cross Petition, the State relies on and incorporates by reference the lengthy statement of the case that was included in the Brief of Respondent filed in the Court of Appeals, No. 83284-1-I, with additions as necessary in the argument section below and the following additions regarding the decision of the Court of Appeals.

In an unpublished opinion, Division I of the Court of Appeals affirmed the petitioner's convictions for Murder in the

Second Degree, unlawful possession of a firearm in the second degree and arson in the second degree. State v. McCollian, No 83284-1-I (Unpublished Opinion). The Court of Appeals found that the trial court properly admitted a text message that said, "he's scaring me," from the victim to her mother because the defense theory of the case made the victim's state of mind relevant and material. *Id*. at 13-15. The Court of Appeals found that the trial court did not abuse its discretion by admitting a text message from the victim that said, "he is so out of his mind," as a present sense impression. *Id*. at 15-16.

The Court of Appeals also found that the trial court erred by concluding that ER 404(b) did not apply to evidence that McCollian had possessed a handgun prior to the incident, but found that there was no reasonable probability that the outcome of the trial would have been materially affected if the evidence error had not occurred. *Id*. at 20-22. Finally, the Court of Appeals found that testimony of a law enforcement officer that there was a perjury statement on a report of a stolen vehicle was

not a comment on McCollian's veracity and any extent to which the officer's comments could be interpreted as the officer not believing the veracity of McCollian's statement, the error was harmless. *Id*. at 22-24.

The Court of Appeals affirmed McCollian's convictions but remanded to the trial court to correct an offender score based on the inclusion of a California conviction for unlawful possession of a controlled substance. The correction was based on the holding in State v. Blake, 197 Wn.2d 170, 481 P.3d 521 (2021). McCollian now seeks review of this Court under RAP 13.4.

C. ISSUES PERTAINING TO ANSWER/CROSS PETITION FOR REVIEW

1. Whether McCollian has demonstrated that the decision of the Court of Appeals regarding the victim's text messages conflicts with prior precedent where the decision of the Court of Appeals properly applies prior cases from this Court.

2. Whether McCollian has demonstrated that review of the Court of Appeals decision finding that the admission of evidence that McCollian possessed a firearm in the days prior to the murder was harmless is appropriate under RAP 13.4(b).

3. If this Court accepts review of the Court of Appeals decision finding that the admission of evidence that McCollian possessed a firearm in the days prior to the murder was harmless, whether this Court should also review whether the trial court properly admitted the evidence under ER 403 and/or ER 404(b).

4. Whether McCollian has demonstrated that review of the Court of Appeals decision finding that testimony regarding the perjury warning on a vehicle theft report and McCollian's reaction to that warning was not an improper opinion and testimony is appropriate under RAP 13.4(b)(2).

D. ARGUMENT

A petition for review will be accepted by this Court only:

> (1) If the decision of the Court of Appeals is in conflict with a decision of the Supreme Court; or

> (2) If the decision of the Court of Appeals is in conflict with a published decision of the Court of Appeals; or
> (3) If a significant question of law under the Constitution of the State of Washington or of the United States is involved; or
> (4) If the petition involves an issue of substantial public interest that should be determined by the Supreme Court.

RAP 13.4(b).

1. decision of the Court of Appeals does not conflict with the holding of *State v. Parr*.

In State v. Parr, 93 Wn.2d 95, 103, 606 P.2d 263 (1980), this Court discussed the use of hearsay exceptions in a homicide case. The Parr Court discussed the state of mind exception to the hearsay rule indicating that the exception applies when "(1) if there is some degree of necessity to use out-of-court, uncross-examined declarations, and (2) if there is circumstantial probability of the trustworthiness of the out-of-court, uncross-examined declarations." *Id*. at 98-99, citing Rayborn v. Hayton, 34 Wn.2d 105, 208 P.2d 133 (1949). The Parr Court stated, "the testimony that the victim had told the witness that she feared the

defendant was admissible under this exception, provided it was relevant and met the test of trustworthiness." Parr, at 99.

The Court later indicated, "In a homicide case, if there is no defense which brings into issue the state of mind of the deceased, evidence of fears or other emotions is ordinarily not relevant." *Id*. at 103. In that case, because the defense was accident, the Court found that "the trial court should allow the State to prove the victim's declaration's about his or her own state of mind, where relevant, but should not permit it to introduce testimony which describes conduct or words of the defendant." *Id*. at 104.

In this case, the defense made Ms. Stutzman's state of mind relevant by implying in their opening statement that Ms. Stutzman had voluntarily gone to Tumwater with McCollian as part of a plan and that something went wrong that caused McCollian to attempt to forget what he had witnessed. RP 296-297, 297-298, 300. The unstated implication of the defense opening statement was to imply that Ms. Stutzman and Mr.

McCollian had traveled to Tumwater purposefully, perhaps for a drug deal. The defense stuck with that theme during closing arguments, which provides further indication of the defense strategy at trial, going as far as to argue that there was an "illegal purpose" in going to Tumwater. RP 1620, 1621, 1631-1632. The tactic that the defense began during opening statements made Ms. Stutzman's state of mind as it related to her intent to leave highly relevant. The trial court did not err by finding that her text messages were relevant to show her then existing state of mind.

Statements from a decedent in a homicide case which demonstrate an intent to go somewhere, or in this case not to go somewhere, have been held admissible under the then existing state of mind exception in ER 803(a)(3). *See*, Mutual Life Ins. Co. v. Hillmon, 145 U.S. 285, 36 L.Ed. 706, 12 S.Ct. 909 (1892)(decedent's statement that he intended to go to a campsite with Hillmon was admissible); State v. Terrovona, 105 Wn.2d 632, 716 P.2d 295 (1986)(distinguishing Parr where decedent

stated he was leaving the house to go help the defendant before he was killed was found admissible). In Terrovona, this Court stated, "the decedent's intentions were admissible to infer that he acted according to those intentions." *Id*. at 642. The Court noted that state of mind evidence used to prove subsequent conduct of the declarant and a third party is not foolproof, but any unreliability goes to the weight of the evidence rather than its admissibility. *Id*. at 641, citing, United States v. Pheaster, 544 F.2d 353, 376 n.14 (9th Cir. 1976), *cert denied*, 429 U.S. 1099 (1977).

The text messages from Ms. Stutzman which indicated that she "needed to leave," "now" and "he's scaring me," were relevant to demonstrate that Ms. Stutzman intended to leave the residence, not voluntarily travel a significant distance to Tumwater. The phrases "he's scaring me," "he's smoked out" and "so out of his mind" were describing conduct at that moment. Statements which are present sense impressions, describing or explaining an event or condition while the declarant was

perceiving the event or condition, or immediately thereafter, are not excluded as hearsay. ER 803(a)(1). This is true even when the statements describe conduct of the defendant. State v. Brush, 183 Wn.2d 550, 560-561, 353 P.3d 213 (2015) (victim's testimony regarding her mother's statements during a stalking incident were admissible under the present sense impression exception).

The decision of the Court of Appeals did not contradict the holding of Parr. The decision of the Court of Appeals, in fact properly applied Parr to the facts of this case by acknowledging that there needed to be a relevant purpose for offering the messages. There is no basis upon which this Court should accept review.

2. The Court of Appeals decision that the admission of firearm evidence was harmless does not conflict with prior precedent involving the prejudice of firearm evidence, therefore review is not appropriate under RAP 13.4(b)(2).

During trial, defense counsel indicated that the defense would be objecting to expected testimony from Jonathan Thomas

regarding Mr. McCollian's possession of a firearm. RP 840-844. The defense submitted a written motion to exclude his testimony. CP 66-81, RP 999. Specifically, the defense indicated that the proposed testimony from Mr. Thomas was that he was at McCollian's apartment about a week prior to the incident and saw numerous weapons, including an "AR-15 that had been converted to fully auto, two pistols that had been converted to fully auto and a Glock with a banana clip." CP 66-67.

The prosecutor stated that Mr. Thomas would testify that he was at "the defendant's apartment approximately five days before this homicide" and that while he was in the apartment, "the defendant displayed for him three firearms, two that [the Prosecutor understood] to be more long guns, but one pistol that identified to him as a Glock, Glock hand gun." RP 1304-1305. Defense counsel argued that such evidence would be governed by ER 404(b). RP 1308. The Prosecutor indicated that the evidence was not ER 404(b) evidence from the State's perspective. RP 1310. The prosecutor clarified that the State did

not identify the issue as evidence under ER 404(b) because "we are not looking at this as propensity evidence." RP 1311.

The prosecutor argued,

> our sole purpose of offering this is because it has direct relevance because it is close in time to the homicide and demonstrates that the defendant had access to a weapon that at least could be consistent with the one used in this case based on what we know, a firearm, and, in particular, a pistol.

RP 1311-1312. The trial court stated, "The Court does not consider this proffered evidence as evidence offered by the State pursuant to or in relation to Evidence Rule 404(b)." RP 1317.

The trial court then conducted an analysis under ER 403, ER 401 and ER 402. RP 1317. The trial court indicated that "it is not alleged, nor is there any evidence in the record thus far to establish or infer or conclude that the homicide was committed through the use of a rifle or a shotgun." RP 1317. However, the trial court found that the observation of Mr. McCollian in possession of a handgun within five days of the incident was relevant evidence. RP 1317. The Court then conducted an ER

403 balancing test and limited the testimony of Mr. Thomas to his observation of Mr. McCollian with a handgun, not long weapons. RP 1318-1319.

Before the jury, Thomas testified "about the 4th or so of December," he went over to McCollian's apartment and McCollian showed him a "pistol." RP 1333. On cross examination, defense counsel asked Thomas about whether the pistol was a Glock and whether it was automatic. RP 1334-1335. The defense proposed a limiting instruction with regard to Thomas' testimony that the State did not object to and the trial court gave the instruction. RP 1480-1481, 1517, CP 107.

In the Court of Appeals, the State argued that the testimony of Johnathan Thomas regarding McCollian's possession of a handgun was properly admitted under ER 403. In this case, the prosecutor indicated that the purpose of offering the testimony of Thomas was to demonstrate that close in time to the homicide, the defendant had access to a weapon that could be consistent with the one used. RP 1311-1312. In State v.

Freeburg, 105 Wn. App. 492, 497-498, 500-501, 20 P.3d 984 (2001), Division I of this Court held that admitting evidence that the defendant possessed a handgun when he was arrested approximately three years after the crime for the purpose of showing flight was erroneous under ER 404(b). In Freeburg, the possession of the gun when the defendant was arrested bore no relevance to the crime charged. In this case, the handgun described by Thomas was possessed by McCollian days before the murder and could be consistent with the type or cartridge and bullet found in the white Toyota. McCollian's access to such a weapon was relevant to the crime charged.

However, the Court of Appeals found that the evidence was not properly admitted under ER 404(b). The erroneous admission of ER 404(b) evidence is harmless if within reasonable probabilities, the outcome of the trial would not have been different but for the error. State v. Jackson, 102 Wn.2d 689, 695, 689 P.2d 76 (1984).

"Strong policy reasons support the use of harmless error

analysis. 'A judicial system which treats every error as a basis for reversal simply could not function because, although the courts can assure a fair trial, they cannot guarantee a perfect one.' State v. White, 72 Wn.2d 524, 531, 433 P.2d 692 (1967). A reversal should occur only when the reliability of the verdict is called into question." State v. Neidigh, 78 Wn. App. 71, 78-79, 895 P.2d 423 (1995).

Evidentiary error is not of constitutional magnitude. "[E]rror is prejudicial only if, within reasonable probabilities, the outcome of the trial would have been materially affected had the error not occurred." State v. Kelly, 102 Wn.2d 188, 199, 685 P.2d 564 (1984). *See also*, State v. Tharp, 96 Wn.2d 591, 599, 637 P.2d 961 (1981); State v. Cunningham, 93 Wn.2d 823, 831, 613 P.2d 1139 (1980).

The evidence in this case was overwhelming. The physical evidence demonstrated that Ms. Stutzman was shot inside the White Toyota Camry that McCollian had rented. RP 507-508, 511, 513, 882, 1248-1249, 1250-1251. The cell phone

records conclusively demonstrated that McCollian was with Ms. Stutzman prior to and at the approximate time that she was shot. RP 1409-1417, 1425-1434. The video and bank records, as well as McCollian's own vehicle theft report demonstrated that McCollian was in possession of the white Toyota on the morning of the homicide and days later. RP 882, 855, 1167, 1382-1385.

Washington State Patrol Forensic Scientist/Crime Scene Investigator Steven Greenwood provided testimony at trial regarding the vehicle. RP 1198-1199, 1205. Greenwood examined the vehicle to look for bloodstains and firearm evidence. RP 1211-1212. He located blood evidence "on the passenger side of the center console, the front vertical portion of the center console, and it continued on to the portion of the front passenger side floorboard." RP 1112. He indicated "there was also bloodstaining above the glove box door and on the interior surfaces of the glove box door." RP 1212. A DNA test of the blood from the glove box of the vehicle matched Sophia Stutzman. RP. 1227-1228, 1287, 1288-1289. Forensic Scientist

Sean Carhart testified that "it is 600 octillion more times likely to observe that evidence profile, if it originated from Sophia Stutzman rather than an unrelated individual selected at random in the U.S. population." RP 1289.

After examining the blood, the analyst collected a cigarette butt, documented a bullet defect on the interior of the vehicle and located a cartridge case. RP 1230. The cartridge case had been fired and was located on the rear driver's side floorboard. RP 1231. The case came from a 9mm Luger cartridge. RP 1236. Greenwood noted a bullet defect located in the passenger side B pillar cover of the car. RP 1236. Greenwood found lead residue, consistent with the passage of a bullet, on the B pillar cover. RP 1239-1240. Under the cover, he located a defect in the seatbelt strap indicating that the seatbelt was pulled out at the time that the bullet caused the defect. RP 1240-1241. After the cover was removed he located an indent in the metal portion of the B pillar, indicating that after the bullet went through the cover, "it impacted the seatbelt and strap and impacted the B pillar and

caused a dent." RP 1241. Greenwood testified that there was a fired bullet between the metal and the B pillar cover. RP 1242.

Based on the forensic evidence, Greenwood concluded that "it's likely that one shot was fired inside the vehicle," and "the female subject was likely sitting in the front passenger seat when she was shot." RP 1248-1249. The direction of travel of the bullet was most likely from the driver's side to the passenger side. RP 1250. Greenwood indicated that the bullet going through the collarbone and coming out of the right arm of the passenger is consistent with what he could tell about the trajectory if the passenger was sitting face forward. RP 1250-1251.

Cell phone records demonstrated that McCollian traveled with the vehicle along I-5 and Ms. Stutzman's cell phone during the time that the events of her murder occurred. RP 1427-1434. During closing arguments, the prosecutor argued that the evidence that he had a firearm on December 12, was the "bullet,

the casing, the bullet hole, the blood" which were found in McCollian's vehicle. RP 1647.

The Court of Appeals correctly found that based on the evidence presented, "it is not reasonably probable that the outcome of the trial would have been materially affected if Thomas' handgun testimony had been excluded." Unpublished Opinion, at 22. The Court of Appeals also correctly distinguished State v. Freeburg, 105 Wn. App. 492, 497-498, 500-501, 20 P.3d 984 (2001), noting significant differences between this case and Freeburg. In particular, the Court in this case noted that "the jury in Freeburg had to decide which witnesses to believe and had conflicting explanations of what happenedJoe." Unpublished Opinion, at 21. In other words, the evidence in Freeburg was not as overwhelming as the evidence against McCollian. McCollian cannot demonstrate that the decision of the Court of Appeals conflicts with prior decisions. Review of this issue is not warranted.

3. If review is accepted regarding the harmless admission of firearm evidence, this Court should also review the decision of the Court of Appeals finding that the evidence was erroneously admitted under ER 403.

In Freeburg, the Court of Appeals held that admitting evidence that the defendant possessed a handgun when he was arrested approximately three years after the crime for the purpose of showing flight was erroneous under ER 404(b). In Freeburg, the possession of the gun when the defendant was arrested bore no relevance to the crime charged. In this case, the handgun described by Thomas was possessed by McCollian days before the murder and could be consistent with the type of cartridge and bullet found in the white Toyota. McCollian's access to such a weapon was relevant to the crime charged.

In order to be relevant and admissible, the State does need to prove that a particular gun was definitively the gun used in the crime. In State v. Pederson, 2013 Wash.App.LEXIS 1924, 176

Wn. App. 1004 (2013),[1] Division I of the Court of Appeals found that possession of a revolver at the time of the defendant's arrest two weeks after a shooting was "highly probative" and relevant where a detective testified that a spent bullet was "most likely" from a revolver. *Id*. at 2, 6. As in that case, there was no error in the trial court's decision that McCollian's access to a handgun days before the murder had probative value that outweighed the prejudicial effect. RP 1317-1319. The trial court's ruling under ER 403 was correct.

Even if the trial court should have considered the issue under ER 404(b), the record demonstrates all of the prongs that the trial court is required to consider. The prosecutor identified the purpose of the evidence, the trial court conducted the ER 403 balancing test on the record and the trial court gave the limiting instruction requested by the defense. RP 1517, CP 107. The evidence only demonstrated that McCollian had access to a

[1] Unpublished decision offered only for whatever value the court deems appropriate under GR 14.1.

weapon, which was highly probative when combined with the fact that Ms. Stutzman was shot inside of McCollian's rental car, in which law enforcement later found a spent shell casing and fired bullet. There was no error in admitting Thomas' testimony.

If this Court accepts review of the Court of Appeals decision regarding harmless error in the admission of the firearm, the State respectfully requests that this Court review the decision in regard to admission of the evidence under ER 403 and ER 404. Evidence rulings under ER 404 involve issues of significant questions of law that are of substantial public interest. The issue of whether possession of a firearm in the days preceding a homicide is relevant and admissible under ER 403 and/or ER 404 should be decided by this Court under RAP 13.4(b)(4). Moreover, a fair consideration of the harmless error analysis raised by Mr. McCollian would require a review of the entire ruling if this Court accepts review.

4. <u>The Court of Appeals opinion that statements of a police officer regarding the perjury and false reporting warning on a theft report form were not improper</u>

opinions on veracity do not conflict with prior case law.

Generally, no witness may offer testimony in the form of an opinion regarding the guilt or veracity of the defendant. State v. Demery, 144 Wn.2d 753, 759, 30 P.3d 1278 (2001). In determining whether testimony amounts to impermissible opinion testimony, courts consider the type of witness involved, the specific nature of the testimony, the nature of the charges, the type of defense and, the other evidence before the trier of fact. *Id*. This Court found that an officer's statement during a taped statement indicating that the defendant was lying was admissible to prove the context to the relevant responses of the defendant. *Id*. at 765. In State v. Jones, 117 Wn. App. 89, 91-92, 68 P.3d 1153 (2003), the Court of Appeals clarified that a majority of the justices in Demery had found that the officer's statement that the defendant was lying was improper opinion testimony. The Jones court found that an "officer's accusation that a defendant is lying constitutes inadmissible opinion evidence." *Id*. at 92.

In this case, Officer Szigalyi did not testify that McCollian was lying, nor did he indicate a belief that he was lying. Officer Szigalyi testified that the form McCollian completed to report the white Toyota as stolen included a perjury statement, advising that it was a crime to make a false report of a stolen vehicle. RP 888-889, 890. That testimony was a statement of fact describing the circumstances of the vehicle theft report, not an opinion on McCollian's veracity. After the vehicle was located, Officer Szigalyi described McCollian's reaction and indicated that he reminded him that making a false police report is a crime. RP 912-913. When asked if he had made any accusations against Mr. McCollian, Officer Szigalyi testified, "No, I had not." RP 913. Using the factors from Demery, the testimony was not a comment on McCollian's veracity.

"Testimony that is not a direct comment on the defendant's guilt or on the veracity of a witness, is otherwise helpful to the jury, and is based on inferences from the evidence is not improper opinion testimony." City of Seattle v. Heatley,

70 Wn. App. 573, 578, 854 P.2d 658 (1993). A factual description is not an opinion. Officer Szigalyi's testimony regarding how McCollian responded to his statements and questions was based on the facts. There was no improper opinion testimony presented.

Additionally, the prosecutor did not commit misconduct by eliciting improper opinion testimony. When the defense initially objected to the prosecutor's question about the form, the prosecutor responded, "I'm not planning to ask him about anybody's veracity. He was just noting what the form had printed on it." RP 889. During closing arguments, the prosecutor never argued that Officer Szigalyi believed that McCollian was not being truthful, his argument advised the jury that they are the sole judge of credibility of the witnesses and focused on McCollian's reaction to the circumstances to argue that McCollian's police report lacked credibility. RP 1539, 1590-1591. There was no improper opinion testimony and no such testimony was elicited from the prosecutor.

The Court of Appeals correctly found "in the instant case, the officer described the form that McCollian filled out when McCollian reported the theft of his Toyota Camry." Unpublished Opinion at 23. The Court also correctly noted,

> The officer never made a direct comment on McCollian's veracity. His testimony included statements of fact including a description of the perjury statement on the police report, a description of how he reminded McCollian about the perjury statement he signed after the vehicle was found, and a description of McCollian's demeanor and reactions. None of this testimony was improper.

Unpublished Opinion at 23-24. The Court of Appeals correctly distinguished the facts of this case from Jones. The Court of Appeals also correctly noted that "to the extent that the officer's reminder can be interpreted as the officer not believing the veracity of McCollian's statement, the error of including this statement was harmless" because it "did not materially affect the outcome of the trial in light of all of the other evidence presented." Unpublished Opinion at 24. Moreover, the Court of Appeals correctly found that "the prosecutor did not seek to

compel the officer's opinion as to whether McCollian was telling the truth." *Id*. at 24.

McCollian has not demonstrated that review of this issue is appropriate under RAP 13.4(b)(2). The opinion of the Court of Appeals does not conflict with the opinion in Jones.

E. CONCLUSION

For the reasons stated herein, the State respectfully requests that this Court deny review. If this Court accepts review of the issue regarding harmless admission of firearm testimony, the State respectfully requests that this Court also accept review of whether the trial court erroneously admitted that evidence under ER 403 and ER 404.

I certify that this document contains 4436 words, as counted by word processing software, not including those portions exempted from the word count under RAP 18.17, in compliance with the requirements of the rule.

Respectfully submitted this 29th day of April, 2022.

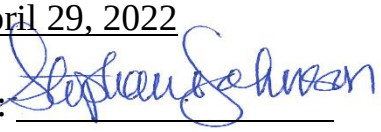
Joseph J.A. Jackson, WSBA# 37306
Attorney for Respondent

DECLARATION OF SERVICE

I hereby certify that on the date indicated below I electronically filed the foregoing document with the Clerk of the Court of Appeals using the Appellate Courts' Portal utilized by the Washington State Court of Appeals, Supreme Court, for Washington, which will provide service of this document to the attorneys of record.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct. Olympia, Washington.

Date: April 29, 2022

Signature: 

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