No. 44710-0-II

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IN THE WASHINGTON STATE COURT OF APPEALS
DIVISION II

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STATE OF WASHINGTON,

Respondent,

vs.

RAYMOND S. REYNOLDSON

Appellant.

---

APPEAL FROM THE SUPERIOR COURT

OF PIERCE COUNTY

Cause No. 06-1-01238-2

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# OPENING BRIEF OF APPELLANT

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## Table of Contents

TABLE OF AUTHORITIES ..... 2
I. ASSIGNMENTS OF ERROR ..... 3
II. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR ..... 4
III. STATEMENT OF THE CASE ..... 5
A. Procedural History ..... 5
B. Facts ..... 8
IV. ARGUMENT ..... 10
V. CONCLUSION ..... 21

## TABLE OF AUTHORITIES

### Cases


In re Det. of D.F.F., 172 Wn.2d 37, 42, 256 P.3d 357 (2011) ..... 16, 17, 19
Jeffries v. Blodgett, 5 F.3d 1180 (9th Cir. 1992) ..... 20
Jeffries v. Wood, 114 F.3d 1484 (9th Cir. 1997) ..... 20
Press-Enter. Co. v. Superior Court of California, 464 U.S. 501, 104 S.Ct. 819, 78 L.Ed.2d 629 (1984) ... 19
Seattle Times Co. v. Ishikawa, 97 Wn.2d 30, 36, 640 P.2d 716 (1982) ..... 15
State v. Allen, 161 Wn.App. 727, 746, 255 P.3d 784, *review granted*, 172 Wn.2d 1014 (2011) ..... 11
State v. Bone-Club, 128 Wn.2d 254, 257, 906 P.2d 325 (1995) ..... 16, 17, 18, 19
State v. Brett, 126 Wn.2d 136, 175, 892 P.2d 29 (1995) ..... 11
State v. Briggs, 55 Wn.App. 44, 776 P.2d 1347 (1989) ..... 19
State v. Caliguri, 99 Wn.2d 501, 664 P.2d 466 (1983) (1983) ..... 19
State v. Denton, 58 Wn.App. 251, 257, 792 P.2d 537 (1990) ..... 12
State v. Easter, 130 Wn.2d 228, 242, 922 P.2d 1285 (1996) ..... 10
State v. Echevarria, 71 Wn. App. 595, 597, 860 P.2d 420 (1993) ..... 10
State v. Foster, 140 Wn. App. 266, 273, 166 P.3d 726, *review denied*, 162 Wn.2d 1007 (2007) ..... 14
State v. Horton, 116 Wn.App. 909, 921, 68 P.3d 1145 (2003) ..... 11
State v. Jackman, 113 Wn.2d 772, 783 P.2d 580 (1989) ..... 19
State v. Lormor, No.84319-8, 2011 WL 2899578, at 4 (Wash. July 21, 2011) ..... 16, 17
State v. Mark, 71 Wn.2d 295, 301, 427 P.2d 1008 (1967) ..... 10
State v. McFarland, 127 Wn.2d 322, 334-35, 899 P.2d 1251 (1995) ..... 14
Strickland v. Washington, 466 U.S. 668, 687, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984) ..... 13, 14
United States v. Edwards, 154 F.3d 915, 921 (9th Cir. 1998) ..... 11
United States v. Roberts, 618 F.2d 530, 533 (9th Cir. 1980) ..... 11
Waller v. Georgia, 467 U.S. 39, 45, 104 S.Ct. 2210 (1984) ..... 15


### Rules


CrR 7.5 ..... 7
RPC 3.7 ..... 11


### Constitutional Provisions


Article I § 10 - Washington State Constitution ..... 15
Article I § 22 - Washington State Constitution ..... 15
Sixth Amendment - United States Constitution ..... 15

## I. ASSIGNMENTS OF ERROR

1. The prosecution committed multiple instances of misconduct during closing and rebuttal argument.

2. Mr. Reynoldson received ineffective assistance of counsel when counsel failed to object to the numerous instances of prosecutorial misconduct.

3. The trial court erred when it allowed a side-bar conference without any subsequent explanation of what was discussed during the side-bar conference.

4. The jurors committed misconduct when they relied on extraneous information to convict Mr. Reynoldson.

## II. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. Whether the numerous instances of prosecutorial misconduct warrant a new trial? (Assignments of Error #1)

2. Whether Mr. Reynoldson received effective assistance of counsel? (Assignments of Error #2)

3. Whether the trial court erred when it allowed a side-bar conference without any subsequent explanation of what was discussed during the side-bar? (Assignments of Error #3)

4. Whether the trial court erred when it allowed the jurors to commit misconduct by them relying on extraneous information to convict Mr. Reynoldson? (Assignments of Error #4)

## III. STATEMENT OF THE CASE

### A. Procedural History

On March 15, 2006, Mr. Reynoldson, Appellant herein, was charged by way of information with one count of kidnapping in the first degree, one count of attempted rape in the first degree, and one count of assault in the second degree. CP 1-2. Trial commenced and Mr. Reynoldson was found guilty as charged on October 1, 2010. 10/1/10 RP 4-5, CP 75-82. The jury also found that I and II were committed with sexual motivation. 10/1/10 RP 5, CP 83-84.

Prosecutorial Misconduct/Ineffective Assistance of Counsel

During closing and rebuttal argument, the prosecutor made several inappropriate remarks (that were not objected to) such as:

- "I would like to go back through at least we are all on the same page on what it is that *the State believes* that the information that was elicited from these witnesses." RP (9/29/10) 1044.

- "He tries to pull her back into the house. And *thank God* for the neighbor Deborah Tarnecki." RP (9/29/10) 1056.

- "She [the alleged victim] *told the truth.*" RP (9/29/10) 1063.

- "She [the alleged victim] *told the truth* as she told you the events that took place on that day while she was seated in that box for you to be able to witness and see how her demeanor as she described those events to you." RP (9/29/10) 1064.

- "So the defendant is guilty – *we believe* that we have proven each of these elements beyond a reasonable doubt." RP (9/29/10) 1084.

- "At a minimum the rape in the – the Attempted Rape in the Third Degree, but *we believe* that we have proven the Attempted Rape in the First Degree." Id.

- "Once you do, *we believe* that you should be or should have an abiding belief in the truth of the charge." RP (9/29/10) 1088.

- "What I would submit to you is that when [the alleged victim] testified to you, *she was honest*." RP (9/29/10) 1089.

- "She [police officer] got up there and *looked honest*." RP (9/29/10) 1090.

- "These [the state's witnesses] are *credible people*." RP (9/29/10) 1091.

- "[The alleged victim] *can be believed*." RP (9/29/10) 1123.

- "She [the alleged victim] didn't come in here with any false pretenses. *She told you like it was*."

RP (9/29/10) 1125.

Public Trial Violation

During the state's closing argument, the prosecutor stopped the argument and asked, "Your Honor, can I address the court for just a moment?" The judge responded, "at sidebar?" to which the prosecutor said "yes." The record reflects a sidebar conference occurred at that point; what was discussed was never revealed. RP (9/29/10) 1053; see also RP (9/29/10) 1128.

Juror Misconduct

The jury was polled after the verdict and all jurors confirmed the verdict. RP 10/1/2010 at 6. Then, minutes later, juror Linda Ortiz called

the judge's judicial assistant and complained that she believed the verdict was erroneous; that she felt browbeat and coerced by the other jurors to return the guilty verdict. CP at 346. Importantly, within Ms. Ortiz's affidavit, she explained statements made by jurors surrounding Mr. Reynoldson's prior crimes and the need for him to be "locked up." Specifically, in her declaration, Ms. Ortiz stated:

> There was discussion between several jurors who opined about how many other times Mr. Reynoldson may have done this and gotten away with it. There also was reference to the necessity of his being locked up.

CP at 342.

No evidence of Mr. Reynoldson's "prior crimes" was mentioned during his trial. See RP's generally.

On November 10, 2010, the Court ordered a new trial pursuant to CrR 7.5, finding that the juror committed misconduct when she lied during the verdict poll. CP at 360. The state appealed this finding on November 10, 2010. CP at 362. In a published opinion filed May 30, 2012, this Court found that the trial court erred when it considered the juror's affidavit. CP at 373 – 381. This Court clearly stated that:

> Therefore, the sole question before us is whether we may consider the juror's statements in her affidavit that she lied when she was polled.

CP at 376.

This Court reversed the trial court's grant of a new trial and remanded for reinstatement of the verdict. CP at 381. Mr. Reynoldson

was thereafter sentenced to life in prison as a persistent offender pursuant to RCW 9.94A.570. See Judgment and Sentence; CP at 398-411.

**B. Facts**

At trial, the state contended Mr. Reynoldson picked up a prostitute, D.M., and, after paying her $50.00 for oral and vaginal sex, kidnapped, raped and assaulted her. RP (9/29/10) 1043-1092. During trial, D.M. admitted she began smoking crack and taking heroin in 1995. RP (9/22/10) 721–722. She also began prostituting herself to pay for the drugs. Id. at 723. According to D.M. she completed substance abuse treatment in 1999 and has "been clean ever since." Id. at 722. Despite that sworn statement, at Mr. Reynoldson's trial, D.M. testified that on March 17, 2000 she was working as a prostitute, had a crack pipe in her pocket, and was high on heroin when she was picked up by Mr. Reynoldson by the McDonald's on 6th Ave in Tacoma. RP 727 –737. She later admitted during cross-examination that she was still using drugs after treatment in 1999. RP 795.

As it related to the incident with Mr. Reynoldson, D.M. admitted her memory was "cloudy." Id. at 737-738. She admitted smoking crack makes a person paranoid, but denied she was smoking crack – despite the fact that she was carrying a crack pipe. Id. at 795-796. She told police she was "hitchhiking" on the corner of 6th and Tacoma when she was picked up. Id. at 796. She told police that after being picked up, Mr. Reynoldson asked her if she would mind if they stopped at his house to pick something

up. Id. at 798. At trial, she admitted that statement was untruthful. Id. Following the alleged incident she made a hand-written statement to police. Within the statement she stated that she entered Mr. Reynoldson's house through the back door. Id. At trial she denied making the statement until confronted with it. Id. As it related to her written statement, D.M. stated, "I will be honest this was fabricated...," and "Okay, but it is not true. Everything was all garbled." Id. at 800; 801. She also told police that as soon as she entered the house, Mr. Reynoldson walked her to the bedroom and threw her down on to the bed. Id at 801. She admitted at trial that statement was untruthful. She told police that she worked for Multicare, but that statement was untruthful as well. Id. at 801. D.M. testified extensively about her nipples being twisted but, just an hour later, when examined by a sexual assault nurse, she never mentioned her nipples being twisted. Id. at 756, 757, 758, 759.

During cross-examination, D.M. was asked if she went into any other rooms in the house. Id. at 803. She said no. Id. Then the following exchange took place:

> Question: Isn't it true that you used the bathroom that night?
>
> Answer: Oh, yeah. I got a washcloth.
>
> Question: You actually asked Mr. Reynoldson where the bathroom was; isn't that correct?
>
> Answer: Yes. I forgot about that. That's true.
>
> Question: You also asked him for a washcloth; isn't that correct?

Answer: Yes.

Id. at 804.

Despite all of D.M's untruthful statements, 10 years later, at Mr. Reynoldson's trial, a jury convicted Mr. Reynoldson of kidnapping, rape and assault.

## IV. ARGUMENT

### A. Mr. Reynoldson was denied a fair trial because the prosecutor committed misconduct on twelve separate occasions.

The cumulative effect of errors occurring at trial may support the grant of a new trial, even if none of the errors standing alone would justify a new trial. State v. Mark, 71 Wn.2d 295, 301, 427 P.2d 1008 (1967). Prosecutorial misconduct denies a defendant the right to a fair trial and necessitates a new trial if there is a substantial likelihood that the comments affected the verdict. State v. Echevarria, 71 Wn. App. 595, 597, 860 P.2d 420 (1993). If the misconduct implicates the constitutional rights of the defendant, however, reversal is required unless the error is harmless beyond a reasonable doubt. State v. Easter, 130 Wn.2d 228, 242, 922 P.2d 1285 (1996). Even in the absence of an objection by the defense, reversal is still required if the remarks were so flagrant or ill-intentioned that no curative instruction could have obviated the prejudice. Echevarria, 71 Wn. App. at 597. A defendant claiming prosecutorial misconduct must establish the impropriety of the state's comments and their prejudicial effect. State v. McKenzie, 157 Wn.2d 44, 52, 134 P.3d 221 (2006).

It is well established that "the prosecutor has a special obligation to avoid 'improper suggestions, insinuations, and especially assertions of personal knowledge.'" United States v. Roberts, 618 F.2d 530, 533 (9th Cir. 1980)(*quoting* Berger v. United States, 295 U.S. 78, 88, 55 S. Ct. 629 (1935)). It is improper for a prosecutor to personally vouch for or against a witness's credibility for truthfulness. State v. Brett, 126 Wn.2d 136, 175, 892 P.2d 29 (1995). Indeed numerous Washington cases have found misconduct where the prosecutor improperly vouched for a witness or made an explicit statement of personal opinion as to a witness's credibility. See, e.g., State v. Allen, 161 Wn.App. 727, 746, 255 P.3d 784, *review granted*, 172 Wn.2d 1014 (2011); State v. Horton, 116 Wn.App. 909, 921, 68 P.3d 1145 (2003).

Further, where a prosecutor explicitly or implicitly communicates his or her personal knowledge about the underlying facts of a case, he or she will be deemed to have vouched for or against the credibility of a witness. United States v. Edwards, 154 F.3d 915, 921 (9th Cir. 1998). Assertions of personal knowledge run afoul of the advocate – witness rule, which prohibits attorneys from testifying in cases they are litigating. Id.; see also, RPC 3.7 cmt. 1 (recognizing that "[c]ombining the roles of advocate and witness can prejudice the tribunal and the opposing party"). Lawyers are not permitted to impart to the jury personal knowledge about an issue in the case under the guise of either direct or cross examination – or during argument – when such information is not otherwise admissible in evidence. State v. Denton, 58

Wn.App. 251, 257, 792 P.2d 537 (1990)(*citing* State v. Yoakum, 37 Wn.2d 137, 222 P.2d 181 (1950)).

Here, during closing argument and rebuttal, the prosecutor made several inappropriate remarks such as:

- "I would like to go back through at least we are all on the same page on what it is that *the State believes* that the information that was elicited from these witnesses." RP (9/29/10) 1044.

- "He tries to pull her back into the house. And *thank God* for the neighbor Deborah Tarnecki." RP (9/29/10) 1056.

- "She [the alleged victim] *told the truth.*" RP (9/29/10) 1063.

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- "So the defendant is guilty – *we believe* that we have proven each of these elements beyond a reasonable doubt." RP (9/29/10) 1084.

- "At a minimum the rape in the – the Attempted Rape in the Third Degree, but *we believe* that we have proven the Attempted Rape in the First Degree." Id.

- "Once you do, *we believe* that you should be or should have an abiding belief in the truth of the charge." RP (9/29/10) 1088.

- "What I would submit to you is that when Donna [the alleged victim] testified to you, *she was honest.*" RP (9/29/10) 1089.

- "She [police officer] got up there and *looked honest.*" RP (9/29/10) 1090.

- "These [the state's witnesses] are *credible people.*" RP (9/29/10) 1091.

- "Donna [the alleged victim] *can be believed.*" RP (9/29/10) 1123.

- "She [the alleged victim] didn't come in here with any false pretenses. *She told you like it was.*"

RP (9/29/10) 1125.

The State's numerous claims about what it "believes" – especially relating to the credibility of the alleged victim and the ultimate issue – were improper. It is well-established that a prosecutor simply cannot vouch for or against a witness's credibility. When this happened here, on no less than twelve occasions between closing and rebuttal closing, it is impossible to conclude that the prosecutor's conduct did not influence the jury. This is especially true where the entirety of the state's case hinged on the credibility of the alleged victim, D.M. By vouching for D.M.'s credibility, the prosecutor represented herself as a witness. That is improper. Therefore, respectfully, reversal is required.

**B. Mr. Reynoldson's counsel was ineffective for failing to object to the numerous instances of prosecutorial misconduct.**

To show ineffective assistance of counsel, a defendant must show that (1) his or her lawyer's representation was deficient and (2) the deficient performance prejudiced him/her. Strickland v. Washington, 466 U.S. 668, 687, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984). Representation is deficient if it falls below an objective standard of reasonableness based on consideration of all the circumstances. State v. McFarland, 127 Wn.2d

322, 334-35, 899 P.2d 1251 (1995). Prejudice occurs when but for counsel's deficient performance, the proceeding's result would have been different. McFarland, 127 Wn.2d at 335. If a party fails to satisfy one prong, this Court need not consider the other. State v. Foster, 140 Wn. App. 266, 273, 166 P.3d 726, *review denied*, 162 Wn.2d 1007 (2007).

Courts are highly deferential to counsel's performance, that is, the defendant must overcome the presumption that, under the circumstances, the challenged action might be considered sound trial strategy. Strickland, 466 U.S. at 689. Tactical decisions cannot form the basis for a claim of ineffective assistance of counsel. McFarland, 127 Wn.2d at 336.

Here, as noted above, the prosecutor made numerous statements vouching for the credibility of the alleged victim and other witnesses. Defense counsel never objected to a single remark. In a trial where credibility of the witnesses was paramount, to allow the state to effectively testify that the alleged victim was a credible witness was to allow the jury to be swayed in favor of believing her.

There is no evidence or reasonable justification to contend that the decision not to object to the numerous remarks was tactical. Again, credibility was critical in this case. Nothing could be gained by allowing additional evidence and support favoring the credibility of those who testified against Mr. Reynoldson.

The second prong of the Strickland test requires the defendant to show prejudice – i.e. that the result of the trial would have been different

but for the ineffective representation. While this is a somewhat ambiguous and subjective standard, it is clear that in this case the credibility of the witnesses was the determinative factor. There was no physical evidence or eyewitness testimony from others besides the alleged victim to support the charges. Therefore, without independent evidence of guilt, it is clear that the result of the trial would have been different had counsel objected to each of the instances of misconduct.

### C. Mr. Reynoldson's public trial rights were violated when a conference occurred at sidebar without any follow-up record stating or discussing what occurred during that instance of courtroom closure.

Both Article I § 22 of the Washington State Constitution and the Sixth Amendment to the United States Constitution guarantee a criminal defendant a "public trial by an impartial jury." Additionally, Article I § 10 of the Washington Constitution provides that "[j]ustice in all cases shall be administered openly," thereby protecting the defendant and the public's interest in open, accessible proceedings. Seattle Times Co. v. Ishikawa, 97 Wn.2d 30, 36, 640 P.2d 716 (1982). "The public trial right is not absolute but may be overcome to serve an overriding interest based on findings that closure is essential and narrowly tailored to preserve higher values. Waller v. Georgia, 467 U.S. 39, 45, 104 S.Ct. 2210 (1984).

Accordingly, the public trial right can only be overcome if courtroom closure is necessary to serve "an overriding interest based on findings that closure is essential and narrowly tailored to preserve higher values." State v. Lormor, No.84319-8, 2011 WL 2899578, at 4 (Wash.

July 21, 2011). Specifically, when seeking to conduct a portion of a trial outside the presence of the public, the Court is required to consider the following factors on the record:

> 1. The proponent of closure must make some showing [of a compelling interest], and where that need is based on a right other than an accused's right to a fair trial, the proponent must show a 'serious and imminent threat' to that right;
>
> 2. Anyone present when the closure motion is made must be given an opportunity to object to the closure;
>
> 3. The proposed method for curtailing open access must be the least restrictive means available for protecting the threatened interests;
>
> 4. The court must weigh the competing interests of the proponent of closure and the public; and
>
> 5. The order must be no broader in its application or duration than necessary to serve its purpose.

State v. Bone-Club, 128 Wn.2d 254, 257, 906 P.2d 325 (1995) (*quoting* Allied Daily Newspapers of Wash. V. Eikenberry, 121 Wn.2d 205, 210-11, 848 P.2d 1258 (1993)).

Because courtroom closures affect the very integrity of a proceeding, in instances where Article I § 10 is violated, the remedy is a new, open trial – regardless of whether the complaining party can show prejudice. In re Det. Of D.F.F., 172 Wn.2d 37, 42, 256 P.3d 357 (2011). This is because "a courtroom closure bears the hallmarks of structural error. Id (*citing* State v. Momah, 167 Wn.2d 140, 148, 217 P.3d 321 (2009)(in the context of a criminal trial, "[a]n error is structural when it

'necessarily render[s] a criminal trial fundamentally unfair or an unreliable vehicle for determining guilt or innocence.'"(second alteration in original (internal quotation marks omitted)(*quoting* Washington v. Recuenco, 548 U.S. 212, 218-19, 126 S.Ct. 2546, 165 L.Ed 466 (2006))).

In Lormor, a case recently decided by our Supreme Court, the defendant's daughter was removed from the courtroom during her father's trial. State v. Lormor, 172 Wn.2d 85, 257 P.3d 624 (2011). The daughter was only four years-old, was very sick and thus required a noisy respirator to breathe. Id. The Supreme Court upheld the trial court's decision to remove the daughter based on the fact that her respirator constituted a "distraction," but emphasized that her removal was justified because "the trial court judge gave reasons on the record for the removal." Id.

Similarly, in another recently decided Supreme Court case, In re Det. of D.F.F., 172 Wn.2d 37, 256 P.3d 357 (2011), the Court held that the defendant's involuntary commitment proceedings were unconstitutional because the judge closed the proceedings to the public. Id. The Court reversed the finding that the defendant should be committed and held that she was entitled to a new set of proceedings. Id. In reaching the decision, the Court cited the five "Bone-Club factors" and stated:

> This is not the first case where this court has granted a new trial when a trial court closed proceedings without considering the five requirements to permit an exception to the open administration of justice right under article I, section 10 or the right to a public trial under article I, section 22. *See* Easterling, 157 Wn.2d at 171 ("We conclude that the trial court committed an error of constitutional magnitude when it directed that

> the courtroom be fully closed to Easterling and to the public during the joint trial without first satisfying the requirements set forth in [*Bone-Club*, 129 Wn.2d at 258-59]. The trial court's failure to engage in the required case-by-case weighing of the competing interests prior to directing the courtroom be closed rendered unfair all subsequent trial proceedings."); *State v. Brightman*, 155 Wn.2d 506, 509, 122 P.3d 150 (2005) ("[T]he trial court erred when it directed that the courtroom would be closed to spectators during jury selection, without fulfilling the requirements set forth in [Bone-Club]. This error entitles Brightman to a new trial."). This result should be of little surprise. The open administration of justice is fundamental to the operation and legitimacy of the courts and to the protections of all other rights and liberties. *See Easterling*, 157 Wn.2d at 187 (Chambers, J., concurring) (The open administration of justice "is a constitutional obligation of the courts. It is integral to our system of government."). The jurisdiction of the courts may be set forth on paper, but the authority of the courts—like every other branch of government—is derived from the people. The ability to imprison or involuntarily confine a citizen is an awesome power and, as such, is always at risk to be abused—with devastating results. It is a historic trend that continues in many parts of the world today, that individuals who disagree with the powers-that-be are labeled mentally ill and their voices are silenced through involuntarily confinement. But the ratifiers of our constitution guaranteed better. The guaranty of open administration of justice is at the very heart of the fairness and legitimacy of judicial proceedings. The public bears witness and scrutinizes the proceedings, assuring they are fair and proper, that any deprivation of liberty is justified. Through this, citizens are guaranteed the strongest protection against unfair or unlawful confinement by the government—the protection afforded because the public is watching. D.F.F. is entitled to that protection. D.F.F. is entitled to new commitment proceedings.

Id.

Here, put quite simply, the trial court never considered any of the

five Bone-Club factors when the public trial right was violated during Mr. Reynoldson's trial. No considerations were made when the sidebar occurred and no explanation or record was made or given after its conclusion. In other words, nobody knows what was discussed. The trial court was required to make findings if it was going to allow the sidebar, and consider reasonable alternatives to its occurrence. As such, there can be little doubt that the trial court's actions during Mr. Reynoldson's trial were clearly contrary to In re Det. Of D.F.F. - as well as to the long established body of law requiring trials to be public, and grounds for limited closure to be addressed on the record. See Press-Enter. Co. v. Superior Court of California, 464 U.S. 501, 510, 104 S.Ct. 819, 78 L.Ed.2d 629 (1984); (holding that, before ordering a closure, a trial court must render "findings specific enough that a reviewing court can determine whether the closure order was properly entered."). Because no such record exists here, the remedy is a new trial.

### D. Where the jurors relied on extraneous information, this Court should reverse Mr. Reynoldson's conviction.

Jury use of extraneous evidence is misconduct entitling a defendant to a new trial if the defendant has been prejudiced. State v. Briggs, 55 Wn.App. 44, 776 P.2d 1347 (1989). The court's inquiry is an objective one. The question is whether the extrinsic evidence could have affected the jury's determination. State v. Caliguri, 99 Wn.2d 501, 664 P.2d 466 (1983) (1983). The court need not delve into the actual affect of the evidence. State v. Jackman, 113 Wn.2d 772, 783 P.2d 580 (1989).

A similar issue presented itself in Jeffries v. Blodgett, 5 F.3d 1180 (9th Cir. 1992). In that case, Jeffries had been convicted of two counts of aggravated first degree murder and sentenced to death. After exhausting Washington State court remedies, Jeffries sought federal habeas relief. One of the issues raised by Jeffries related to the jury's consideration of extrinsic evidence, specifically relating to his criminal history. The District Court considered the allegation of extrinsic evidence through presentation of affidavits by the defendant, but it did not hold an evidentiary hearing. In Jeffries, the Court concluded that the extrinsic information of the nature alleged to have been communicated, if true, would have had a substantial and injurious affect or influence and remanded the matter to the trial court to conduct an evidentiary hearing to determine the truth of the allegations. On remand, the trial court found jury misconduct. The trial court's findings were appealed and affirmed. See Jeffries v. Wood, 114 F.3d 1484 (9th Cir. 1997).

Here, following trial, Juror Ortiz stated that other jury members were fixated on Mr. Reynoldson's prior crimes. She stated specifically:

> There was discussion between several jurors who opined about how many other times Mr. Reynoldson may have done this and gotten away with it. There also was reference to the necessity of his being locked up.

CP at 342.

She also stated, "[s]ome of the other jurors were so assertive and aggressive that I felt as if I was sitting with a blood-thirsty lynch mob." Id. at 343.

Respectfully, as this Court is aware, Mr. Reynoldson was sentenced to life following these convictions. Such a sentence is only available if the defendant has prior convictions. It appears the jurors became aware of these convictions and relied on them even though juror Ortiz felt there was reasonable doubt. In accordance with the cases cited above, reversal of Mr. Reynoldson's conviction is appropriate.

## V. CONCLUSION

Based on the above cited files and authorities, respectfully, this Court should reverse Mr. Reynoldson's conviction.

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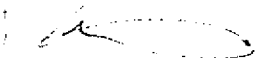

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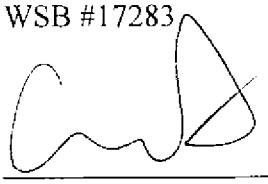

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CERTIFICATE OF SERVICE

Lee Ann Mathews, hereby certifies under penalty of perjury under the laws of the State of Washington, that on the day set out below, I delivered true and correct copies of the opening brief of appellant to which this certificate is attached, by United States Mail or ABC-Legal Messengers, Inc., to the following:

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Aberdeen, WA 98520

Signed at Tacoma, Washington, this 3rd day of January, 2014.

LEE ANN MATHEWS

# HESTER LAW OFFICES

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**Transmittal Letter**

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Case Name: State v. Reynoldson

Court of Appeals Case Number: 44710-0

**Is this a Personal Restraint Petition?** Yes ■ No

**The document being Filed is:**

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: ____

Answer/Reply to Motion: ____

■ Brief: Appellant's

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: ____
Hearing Date(s): _____

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

**Comments:**

No Comments were entered.

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