

No. 46082-3-II

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IN THE WASHINGTON STATE COURT OF APPEALS  
DIVISION II

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STATE OF WASHINGTON,

Respondent,

vs.

JEFFREY A. ROETGER

Appellant.

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APPEAL FROM THE SUPERIOR COURT  
OF PIERCE COUNTY  
Cause No. 12-1-00033-8

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OPENING BRIEF OF APPELLANT

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LANCE M. HESTER  
WSB #27813  
CASEY M. ARBENZ  
WSB #40581

HESTER LAW GROUP, INC., P.S.  
Attorneys for Appellant  
1008 South Yakima Avenue, Suite 302  
Tacoma, Washington 98405  
(253) 272-2157

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**I. ASSIGNMENTS OF ERROR**

1. The numerous instances of prosecutorial misconduct warrant reversal of Mr. Roetger's convictions.
2. That Mr. Roetger received ineffective assistance of counsel when counsel failed to object to numerous instances of prosecutorial misconduct.
3. The trial court erred in denying Mr. Roetger's request to present evidence relating to a prior sex offense committed against one of his alleged victims.

## **II. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR**

1. Whether the numerous instances of prosecutorial misconduct warrant reversal of Mr. Roetger's convictions? (Assignments of Error #1)
2. Whether Mr. Roetger received ineffective assistance of counsel when counsel failed to object to numerous instances of prosecutorial misconduct? (Assignments of Error #2)
3. Whether the trial court erred in denying Mr. Roetger's request to present evidence relating to a prior sex offense committed against one of his alleged victim? (Assignments of Error #3)

### **III. STATEMENT OF THE CASE**

#### **A. Procedural History**

Jeffrey Roetger, petitioner herein, was convicted of one count of rape of a child in the first degree (count I), two counts of child molestation in the first degree (counts IV and V), one count of rape of a child in the second degree (count VI) and one count of rape of a child in the third degree (count VII) following a jury trial. CP 183-89. He was found not guilty of two counts of rape of a child in the first degree (counts II and III). *Id.* The jury returned a special verdict finding of an “ongoing pattern of sexual abuse” on counts I and IV. CP 190-92. The trial court sentenced Mr. Roetger to a standard range sentence of 318 months to life. CP 247. This appeal timely follows.

Prior to trial, defense counsel sought permission to admit evidence that one of the alleged victims [A.K] had been previously victimized by her brother and that he had been convicted of the abuse. The trial court declined to allow the evidence. RP (1/23/14) 54.

#### **Prosecutorial Misconduct/Ineffective Assistance of Counsel**

During closing and rebuttal argument, the prosecutor made multiple improper remarks such as:

*Those are the incidents. You find any one of those happened, any one of those two beyond a reasonable doubt, then he is guilty. They both happened. He is guilty of molesting [A.C.].* RP (2/4/14) 403.

*The simple fact is she didn't make this up. It happened to her at the hands of the defendant. The defendant repeatedly violated her, over and over and over. For that,*

*he should be held responsible. For that, he is guilty of all seven counts and the aggravators. Id. at 409.*

*Somebody is incredible here. It is the defendant and his wife, the stories you heard from them. They are just that, stories. Id. at 436.*

*You judge credibility. Look at how they testified. What you saw from [A.K] was real emotion that was not faked. She was giving you the real story. It was emotional for her. She had problems getting it out. That was real. You looked at [A.C]. When [A.C] was testifying, defense counsel was standing in a manner that made her eyesight go to the defendant. She was in fear. She asked him to move for that reason so she didn't have to look over there. That is real fear. That is not something that is faked. Id. at 438-39.*

*Oh, I think [A.K] is getting it smacked right in her face. [A.K] understands exactly the reality of her situation. Her mom has basically disowned her as a result of this. Counsel said, well, one of the things, one of the things he pointed out is sometimes kids make this up so that mommy will kick daddy out of the house. Well, that's not what happened here. This came to light and [A.K] got the boot right away. [Mr. Roetger's wife] wasn't even truthful about what happened there on the stand. Trying to make herself look better. We will get to that. Id. at 439-440.*

*The stories [A.K. and A.C] give you are consistent. They are consistent in that it happened. These acts happened. The defendant is living a nightmare for three years. He raped and molested two girls. They have lived with that since they were children. I don't care about his nightmare. Neither should you<sup>1</sup>. Id. at 441.*

*This is not embellishment. This is what happened to her. That's what she's telling you. Id. at 442.*

*Now, I have no doubt at some point [Mr. Roetger] did that when they learned to swim. That's not what was happening on these occasions. Id. at 446.*

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<sup>1</sup> This comment was objected to and the objection was sustained – although no corrective instruction was sought or given.

*Obviously [the defendant] didn't have that conversation with her. If it truly happened like he said it did, then you would tell the mom. He didn't. Because it didn't happen that way. Id. at 448.*

*[Mr. Roetger's wife is] doing that to make herself look good. That is the only reasons she did that. No point was that the truth. No point was she truthful here on the stand<sup>2</sup>. Id. at 449.*

*The defendant is guilty. There is no reason why [A.C] and [A.K.] would ever go through all of this to make it up. What they told you was what happened to them. [A.K] was systematically, and over the course of years, sexually abused by that defendant. That is what happened. If you believe them, if you believe what they told you on the stand, the defendant is guilty. What they told you was the truth. What they told you happened. The defendant is guilty. That is reasonable doubt. That is all I have to prove. I don't have to get everything defense counsel says. Oh, well, maybe I could have gotten medical records. That is not what reasonable doubt is. Reasonable doubt is your belief in truth of charges. When you listen to [A.K], when you listen to [A.C], what they are telling you is what happened to them. RP 451-52.*

## **B. Facts**

Jeff and Kristine Roetger were married on June 16, 2006 and have been married ever since. RP 335, 337. They each entered the marriage with children: Mr. Roetger with one son, Mrs. Roetger with two sons and a daughter, A.K. RP 335-36. A.K. was seven or eight when Mr. and Mrs. Roetger began their relationship. RP 336. Mr. Roetger was blamed for breaking up the relationship between Mrs. Roetger and her former husband (A.K.'s father). RP 336.

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<sup>2</sup> This comment was also objected to and the objection was sustained – although, again, no corrective instruction was sought or given.



From 2005 to 2011, Mr. Roetger worked at a company called Expeditors – working first as a “warehouseman” driving a forklift and later as a shift lead. RP 338. He worked the swing shift during that period of time which meant he worked from roughly 3:00 p.m. each day until 11:00 p.m. or later. RP 339. Because A.K. was not home from school until after Mr. Roetger would leave for work each day, they were not home at the same time. RP 341.

During this period of time, A.K. developed a friendship with a classmate, A.C. RP 342. By all accounts A.K. and A.C. were close friends throughout elementary school. RP 148. A.C. would “sleep over a lot, stay over a lot.” RP 224. A.K. and A.C. drifted apart after elementary school and were no longer friends after that. RP 148.

On August 15, 2011, Mr. Roetger became aware that he was being falsely accused of raping and molesting his step-daughter A.K. and molesting, A.C. RP 364. He was soon thereafter contacted by police. He voluntarily cooperated and gave a statement – adamantly denying the allegations. RP 364-65.

At trial, the state’s case against Mr. Roetger did not include any physical evidence nor any eyewitness testimony; rather its case relied entirely on the testimony of A.K. and A.C. See RP’s generally. A.K. and A.C.’s versions of Mr. Roetger’s alleged brazen misconduct varied greatly in both what they personally observed, but also from statement to

statement. Upon being confronted with their inconsistencies, oftentimes the allegations evolved again. For example:

A.C. claimed she and A.K. accompanied Mr. Roetger to his work one time and while there, they were playing under a desk. A.C. claimed Mr. Roetger told the girls that they could not come out from under the desk unless they lifted their shirts and exposed their breasts to him. RP 156. A.C. admitted seeing security cameras in the office. RP 162. A.C. stated that no contact occurred. A.K. testified differently, saying Mr. Roetger touched both girls during that visit to Mr. Roetger's place of work. RP 207. In a previous interview she stated that no contact had occurred that day. RP 215.

A.C. alleged that she and A.K. rode in Mr. Roetger's car and that he would allow them to sit on his lap and control the steering wheel but during that time he would inappropriately touch them. RP 157. She specifically testified that Mr. Roetger would have one hand on the steering wheel and would touch her with the other hand. RP 164. This was inconsistent with what she stated during a defense interview – where she specifically stated Mr. Roetger did not have either hand on the steering wheel. RP 166. She could not remember if the vehicle was big or small, nor whether it was a car or truck. RP 166. A.K. said this occurred when she was 14 or 15. RP 222. She said it occurred 4 or 5 times. RP 222. A.K. testified that she would sit on Mr. Roetger's lap and that A.C. would do the same. RP 222 -23. This was inconsistent with what A.K. stated during

a prior interview where she denied that she or A.C. had ever sat in Mr. Roetger's lap. RP 223. When confronted with this inconsistency, A.K. admitted that Mr. Roetger never touched her or A.K. inappropriately while driving. RP 223.

A.K. testified about an incident where Mr. Roetger had allegedly taken her to the warehouse at his job and tried to take off her pants and put his fingers and his penis on or in her vagina. RP 226. This was inconsistent with a pretrial interview where she denied Mr. Roetger used his finger or his penis. RP 227. She outright admitted that her previous statement was different than her trial testimony. RP 227.

A.K. testified she never told her mom (Kristine Roetger) about the alleged abuse, however, that was inconsistent with what she stated in a different interview – where she stated she tried to tell her mom what was allegedly occurring. RP 212-13. Mrs. Roetger denied any such conversation ever occurred. RP 302.

During a pretrial interview, A.K. was adamant that she was abused by Mr. Roetger “every day.” RP 217. However, this was different than her trial testimony where she stated the incidents were sporadic. RP 216. During cross-examination it was pointed out that during her pretrial interview actually had told multiple different versions of the same statement regarding frequency of contact. RP 217. However, A.K. stubbornly declined to admit that she was making two different statements. RP 217-218.

A.C. claimed she went with A.K.'s family to Ocean Shores. RP 149. On that trip, A.C. and the Roetger family were swimming and playing in a hotel pool. RP 154. A.C. stated that Mr. Roetger touched her inappropriately in the swimming pool. RP 154. She stated that several members of Mr. Roetger's family were present in the pool when this molestation was allegedly occurring. RP 168. A.K. testified that she did not remember A.C. accompanying the Roetger family vacation to Ocean Shores. RP 191. Mrs. Roetger testified that A.C. was there but that her entire family was in the pool as were at least six other hotel guests. RP 304. She did not observe anything inappropriate. RP 306.

A.C. also claimed that she accompanied A.K.'s family to Wild Waves and that Mr. Roetger inappropriately touched her vagina in the Wild Waves pool. RP 155. She admitted Mrs. Roetger and several family members – in addition to many people from the crowd – were present when this touching allegedly occurred. RP 170-71.

A.C. described an incident where she was watching TV at A.K.'s house when Mr. Roetger allegedly reached around her shoulder and fondled her breast. RP 159. She claimed Mrs. Roetger possibly witnessed this. RP 160. Mrs. Roetger denied ever witnessing such an incident. RP 308.

A.K. testified the only person she told about the abuse was A.C. and then seconds later stated that she also told another girl, Jennifer Adamson. RP 218. Similarly, she told an interviewer that Mr. Roetger

would show favoritism towards his son, Connor and then rub A.K.'s face in it. RP 220. She denied that occurred during trial. RP 220.

Regarding whether misconduct occurred during the frequent sleep overs, A.K.'s testimony was wildly inconsistent. RP 224. She first stated that inappropriate conduct occurred during the sleep overs. *Id.* Then she stated it didn't. *Id.* She then testified that it did. RP 224.

#### IV. ARGUMENT

##### **A. Mr. Roetger was denied a fair trial because the prosecutor committed misconduct on multiple occasions.**

As noted above, during closing and rebuttal argument, the prosecutor made multiple improper remarks such as:

*Those are the incidents. You find any one of those happened, any one of those two beyond a reasonable doubt, then he is guilty. They both happened. He is guilty of molesting [A.C.]. RP (2/4/14) 403.*

*The simple fact is she didn't make this up. It happened to her at the hands of the defendant. The defendant repeatedly violated her, over and over and over. For that, he should be held responsible. For that, he is guilty of all seven counts and the aggravators. *Id.* at 409.*

*Somebody is incredible here. It is the defendant and his wife, the stories you heard from them. They are just that, stories. *Id.* at 436.*

*You judge credibility. Look at how they testified. What you saw from [A.K] was real emotion that was not faked. She was giving you the real story. It was emotional for her. She had problems getting it out. That was real. You looked at [A.C]. When [A.C] was testifying, defense counsel was standing in a manner that made her eyesight go to the defendant. She was in fear. She asked him to move for that reason so she didn't have to look over there. That is real fear. That is not something that is faked. *Id.* at 438-39.*

*Oh, I think [A.K.] is getting it smacked right in her face. [A.K.] understands exactly the reality of her situation. Her mom has basically disowned her as a result of this. Counsel said, well, one of the things, one of the things he pointed out is sometimes kids make this up so that mommy will kick daddy out of the house. Well, that's not what happened here. This came to light and [A.K.] got the boot right away. [Mr. Roetger's wife] wasn't even truthful about what happened there on the stand. Trying to make herself look better. We will get to that. Id. at 439-440.*

*The stories [A.K. and A.C.] give you are consistent. They are consistent in that it happened. These acts happened. The defendant is living a nightmare for three years. He raped and molested two girls. They have lived with that since they were children. I don't care about his nightmare. Neither should you<sup>3</sup>. Id. at 441.*

*This is not embellishment. This is what happened to her. That's what she's telling you. Id. at 442.*

*Now, I have no doubt at some point [Mr. Roetger] did that when they learned to swim. That's not what was happening on these occasions. Id. at 446.*

*Obviously [the defendant] didn't have that conversation with her. If it truly happened like he said it did, then you would tell the mom. He didn't. Because it didn't happen that way. Id. at 448.*

*[Mr. Roetger's wife is] doing that to make herself look good. That is the only reasons she did that. No point was that the truth. No point was she truthful here on the stand<sup>4</sup>. Id. at 449.*

*The defendant is guilty. There is no reason why [A.C.] and [A.K.] would ever go through all of this to make it up. What they told you was what happened to them. [A.K.] was systematically, and over the course of years, sexually abused by that defendant. That is what happened. If you*

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<sup>3</sup> This comment was objected to and the objection was sustained – although no corrective instruction was sought or given.

<sup>4</sup> This comment was also objected to and the objection was sustained – although, again, no corrective instruction was sought or given.

believe them, if you believe what they told you on the stand, the defendant is guilty. *What they told you was the truth. What they told you happened. The defendant is guilty.* That is reasonable doubt. That is all I have to prove. I don't have to get everything defense counsel says. Oh, well, maybe I could have gotten medical records. That is not what reasonable doubt is. Reasonable doubt is your belief in truth of charges. *When you listen to [A.K], when you listen to [A.C], what they are telling you is what happened to them.* RP 451-52.

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 (9<sup>th</sup> 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).

In In re the Pers. Restraint of Glasmann, 175 Wn.2d 696, 286 P.3d 673, 675 (2012) our Supreme Court stated:

The right to a fair trial is a fundamental liberty secured by the Sixth and Fourteenth Amendments to the United States Constitution and Article I, section 22 of the Washington State Constitution. Prosecutorial misconduct may deprive a defendant of his constitutional right to a fair trial. "A "[f]air trial" certainly implies a trial in which the attorney representing the state does not throw the prestige of his public office ... and the expression of his own belief of guilt into the scales against the accused."

Id. At 677 (internal citations omitted).

The Court in Glassman went on to cite the commentary on the *American Bar Association Standards for Criminal Justice* std. 3-5.8, which holds:

The prosecutor's argument is likely to have significant persuasive force with the jury. Accordingly, the scope of argument must be consistent with the evidence and marked by the fairness that should characterize all of the prosecutor's conduct. Prosecutorial conduct in argument is a matter of special concern because of the possibility that the jury will give special weight



to the prosecutor's arguments, not only because of the prestige associated with the prosecutor's office but also because of the fact-finding facilities presumably available to the office.

Glasmann, 286 P.3d at 679 (*quoting American Bar Association Standards for Criminal Justice* std. 3-5.8).

Here, the state made numerous conclusory remarks about Mr. Roetger's guilt; each of which were poorly masked statements about what the state "believes." Such conclusions of guilt were improper for numerous reasons. The remarks served as personal testimony from the prosecutor who was acting as a witness; informing the jury of what the state believes. That was improper. That it happened numerous times only served to tilt the balance of fairness away from Mr. Roetger, thereby denying him his constitutional right to a fair trial from an impartial jury.

Further, the prosecutor's statements served as personal testimony bolstering the credibility of the state's witnesses while disparaging the credibility of Mr. Roetger and his witnesses. That was improper. The jury was the fact-finder and its job was to conclude which witnesses were credible and which were not. Testimony from the state about what or who it believed further served to deny Mr. Roetger a fair trial.

As noted, the prosecutor's office has inherent prestige and presumed "fact-finding facilities" that jurors are aware of as set forth in the ABA comment cited in Glasmann. In other words, jurors see prosecutors as credible. If the prosecutor is allowed to testify as to what he/she believes, the defendant is denied the presumption of innocence and

placed in a position of proving the prosecutor's beliefs are wrong. Of course this again serves to deny a defendant like Mr. Roetger his right to a fair trial.

Finally, the ABA comment also discusses the presumed "fact-finding facilities" of the prosecutor's office. This presumption from the jury that the prosecutor "really knows what happened" tips the balance against the defendant if the prosecutor is allowed to express that belief in trial rather than let the evidence determine guilt.

The jury in Mr. Roetger's case was not presented with physical evidence of guilt or eyewitness testimony. The case came down solely to the accusations of A.K. and A.C. versus Mr. Roetger's denial of the accusations. Mr. Roetger has highlighted the numerous inconsistencies in the testimony and statements of his accusers. The jury apparently looked past the inconsistencies and found an "abiding belief" in the truth of the charges. However, the jury was exposed to the multiple instances of prosecutorial misconduct in the state's closing and rebuttal closing arguments. Mr. Roetger could not cross-examine the prosecutor. The state received the benefit of having a witness with inherent prestige and inherent fact-finding facilities testify in its closing argument. That was improper.

In a case like Mr. Roetger's - where credibility of the witnesses was paramount, the state should not have been allowed to personally

vouch for its witnesses. Where that happened here, the prosecutor committed misconduct and respectfully, reversal is required.

**B. Mr. Roetger's counsel was ineffective in his handling 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, *rev. 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 victims and the truthfulness of their testimony and the state's case. Defense counsel only objected to two of the remarks. Both objections were sustained but no curative instructions

– nor a mistrial – were sought. The jurors were never instructed to disregard the prosecutor’s improper remarks. In a trial where credibility of the witnesses was paramount, to allow the state to effectively testify that the alleged victims were credible witness was to allow the jury to be swayed in favor of believing them.

There is no evidence or reasonable justification to contend that the decision not to object to the numerous remarks was tactical, nor can it be argued that counsel shouldn’t have sought curative relief or a mistrial when his objections were sustained. Again, credibility was critical in this case – as the accusers’ statements provided the only “evidence” of criminal behavior. Nothing could be gained by allowing additional evidence and support favoring the credibility of those who testified against Mr. Roetger.

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 victims to support the charges and their testimony was replete with inconsistencies. 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 and sought curative relief or a mistrial following the objections that were sustained.

**C. The trial court erred in excluding evidence relating to a prior sex offense committed against one of his alleged victims.**

At trial, Mr. Roetger sought to present evidence that one of his alleged victims, A.K. had been abused by her brother during a period between 2003 and 2004 (The allegations against Mr. Roetger allegedly began in 2005). RP 35-54. The state sought exclusion of the same evidence citing, among other things, the rape shield statute. *Id.*

Specifically the defense sought to present the evidence so as to rebut the inevitable presumption from the jury that A.K.'s sexual knowledge was connected to acts involving Mr. Roetger. Defense counsel briefed the matter and it was argued in pretrial motions. *Id.*; RP 35-54. The Court excluded the evidence. RP 54.

The trial court's decision to exclude the evidence was in direct conflict with State v. Carver, 37 Wn.2d 122, 678 P.2d 842 (1984). In Carver, this Court held that the evidence of prior sexual abuse was relevant to Carver's defense because without it, the state could argue that the victims would not have knowledge of sex acts but for the (alleged) acts of the defendant.

Carver is on-point. The allegations from A.K. and A.C. involved sexual touching of several different varieties allegedly beginning in elementary school. The jury was left with the presumption that the accusers would not be aware of such sexual acts but for the acts of Mr.

Roetger. This was unfair where A.K. had been subjected to similar abuse by her brother and likely learned about those sexual acts from him. That A.K. and A.C. were best friends suggests A.C.'s knowledge of those sex acts may have come from A.K.'s disclosures to her about what her brother was doing – not from incidents involving Mr. Roetger.

The exclusion of the prior sex abuse evidence served to deny Mr. Roetger the ability to challenge his accusers' basis of sexual knowledge. It also denied him his constitutional right to present a defense. For those reasons, respectfully, this Court should reverse his conviction.

V. **CONCLUSION**

Based on the above cited facts, files and authorities, Mr. Roetger respectfully requests reversal of his convictions.


Respectfully submitted this 17<sup>th</sup> day of October, 2014.

HESTER LAW GROUP, INC., P.S.  
Attorneys for Appellant



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LANCE M. HESTER, WSB #27813



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CASEY M. ARBENZ, WSB #40581

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:

Kathleen Proctor  
Deputy Prosecuting Attorney  
930 Tacoma Avenue South, #946  
Tacoma, WA 98402

Jeffrey A. Roetger  
DOC #372101  
Stafford Creek Corrections Center  
191 Constantine Way  
Aberdeen, WA 98520

Signed at Tacoma, Washington, this 17<sup>th</sup> day of October, 2014.

  
LEE ANN MATHEWS

## HESTER LAW OFFICES

**October 17, 2014 - 4:53 PM**

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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.

Sender Name: Leeann Mathews - Email: [leeann@hesterlawgroup.com](mailto:leeann@hesterlawgroup.com)

A copy of this document has been emailed to the following addresses:

[pcpatcecf@co.pierce.wa.us](mailto:pcpatcecf@co.pierce.wa.us)