Supreme Court No. 99030-1
Division III, No. 36600-6-III
correct COA # is 36660-0-III

IN THE
SUPREME COURT
OF THE
STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

PAULA MACHELE GARDNER,

Petitioner

PETITION FOR REVIEW FOLLOWING
APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR LINCOLN COUNTY

The Honorable Judge John Strohmaier

PETITION FOR REVIEW

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A. IDENTITY OF PETITIONER

Petitioner Paula Gardner asks this Court to accept review of the Court of Appeals' decision that affirmed her conviction for possession of a controlled substance.

B. DECISION FOR WHICH REVIEW IS SOUGHT

The Court of Appeals, Division III, opinion published in part, filed on August 18, 2020. A copy of this opinion is attached as Appendix A. Review of the published portion of the opinion is being sought. *See* Appendix A, pgs. 1-4.

C. ISSUES PRESENTED FOR REVIEW

Issue 1: Whether this Court should accept review under RAP 13.4(b)(2) or (4), because the trial court erred in sentencing Ms. Gardner for a felony crime when the jury's verdict does not support the sentence for possession of methamphetamine because the to-convict instruction did not specify which controlled substance was possessed, requiring remand for resentencing to impose a misdemeanor sentence.

D. STATEMENT OF THE CASE

The State charged Paula Gardner by amended information with possession of a controlled substance, methamphetamine (Count Two)[1], due to events occurring on February 10, 2018, in Davenport, Washington. (CP 86-87). The case proceeded to a jury trial. (RP 266-419).

[1] Ms. Gardner was also charged with first degree burglary (Count One), but this petition for review solely pertains to Count Two.

The jury was given the following "to-convict" instruction on possession of a controlled substance (Count Two):

> To convict the defendant of the crime of possession of a controlled substance, each of the following elements of the crime must be proved beyond a reasonable doubt:
>
> (1) That on or about February 10, 2018, the defendant possessed a controlled substance; and
>
> (2) That this act occurred in the State of Washington.
>
> If you find from the evidence that each of these elements has been proved beyond a reasonable doubt, then it will be your duty to return a verdict of guilty.
>
> On the other hand, if after weighing all the evidence, you have a reasonable doubt as to any one of these elements, then it will be your duty to return a verdict of not guilty.

(Instruction No. 13, CP 287; RP 436).

The jury was also given the following additional instructions:

> It is a crime for any person to possess a controlled substance.

(Instruction No. 11, CP 285; RP 436).

…

> Methamphetamine is a controlled substance.

(Instruction No. 12, CP 286; RP 436).

Ms. Gardner was found guilty of possession of a controlled substance in Count Two. (CP 291-292; RP 452). But the verdict form did not identify which controlled substance. (CP 292). Rather, the verdict form states:

> We, the jury, find the defendant Paula M. Gardner "Guilty" of the crime of Possession of a Controlled Substance—other than Marijuana in Count II.

(CP 292; RP 452).

At sentencing, Ms. Gardner was sentenced to 116 months for the residential burglary in Count One, and 24 months for the possession of a controlled substance other than Marijuana in Count Two. (CP 309; RP 469). The trial court imposed an exceptional sentence, requiring the 116 months and 24 months run consecutively. (CP 308-309, 379-380; RP 469). The court based the exceptional sentence upon the fact Ms. Gardner had been convicted of multiple offenses, and due to her offender score of 23, the court decided the conviction for Count Two would go "unpunished if the sentences were to run concurrently." (Supp. CP 1).

Ms. Gardner appealed. (CP 330-358). On appeal, Ms. Gardner argued her sentence under Count Two was unauthorized because the jury's verdict form did not specify which controlled substance she was guilty of possessing.[2] The Court of Appeals rejected these arguments and affirmed Ms. Gardner's sentence for possession of a controlled substance as a felony. *See* Appendix A. Ms. Gardner now seeks review by this Court.

E. ARGUMENT

A petition for review will be accepted by the Supreme Court only:

[2] Ms. Gardner also challenged the revocation of her plea agreement and the imposition of community supervision fees, which are not raised here.

(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 another 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).

Issue 1: Whether this Court should accept review under RAP 13.4(b)(2) or (4), because the trial court erred in sentencing Ms. Gardner for a felony crime when the jury's verdict does not support the sentence for possession of methamphetamine because the to-convict instruction did not specify which controlled substance was possessed, requiring remand for resentencing to impose a misdemeanor sentence.

Review by this Court is merited because the Court of Appeals' decision conflicts with other decisions by the Court of Appeals. *See State v. Clark-El*, 196 Wn. App. 614, 384 P.3d 627 (2016) (Div. I); *State v. Gonzalez*, 2 Wn. App. 2d 96, 408 P.3d 743 (2018) (Div. II). *See also*, *State v. Murillo*, No. 35695-5-III, 2019 WL 4805332, at *9, 12 (Wash. Ct. App. Oct. 1, 2019) (Div. III); *see also* GR 14.1(a) (authorizing citation to unpublished opinions of the Court of Appeals filed on or after March 1, 2013, as nonbinding authority); RAP 13.4(b)(2). Division Three of the Court of Appeals acknowledges this issue is one that has divided the appellate courts. *See* Appendix A, pg. 3.

Review by this Court is also merited because the Court of Appeals' decision involves an issue of substantial public interest; jury verdicts authorize legal sentences, and a sentence should not be authorized by a default finding. *See* Appendix A, pg. 4 (stating that "[a]lthough a negative finding, it was sufficient to place Ms. Gardner's offense within the scope of the felony drug sentencing grid because [the verdict form] eliminated marijuana as a basis for the conviction"); *but see State v. Clark-El*, 196 Wn. App. 614, 624, 384 P.3d 627 (2016) ("[t]he constitutional right to jury trial requires that a sentence must be authorized by a jury's verdict"); RAP 13.4(b)(4).

The jury's verdict for possession of a controlled substance does not support the sentence for possession of methamphetamine because the to-convict instruction did not specify which controlled substance was possessed, and neither did the verdict form. Here, the verdict form merely stated the jury found Ms. Gardner guilty of possession of a controlled substance "other than [m]arijuana." (CP 292; RP 452). Remand for resentencing is required to impose a misdemeanor sentence.

"A to-convict instruction must include all essential elements of the crime charged." *Clark-El*, 196 Wn. App. at 618 (citing *State v. Smith*, 131 Wn.2d 258, 263, 930 P.2d 917 (1997)). "[A] 'to convict' instruction must contain all of the elements of the crime because it serves as a 'yardstick' by which the jury measures the evidence to determine guilt or innocence." *Smith*, 131 Wn.2d at 263. The omission of an element of a charged crime from the to-convict

instruction may be raised for the first time on appeal. *State v. Mills*, 154 Wn.2d 1, 6, 109 P.3d 415, 417 (2005). Alleged error in jury instructions is subject to de novo review. *State v. Sibert*, 168 Wn.2d 306, 311, 230 P.3d 142 (2010).

"When the identity of a controlled substance increases the statutory maximum sentence which the defendant may face upon conviction, that identity is an essential element." *Clark-El*, 196 Wn. App. at 618 (citing *State v. Goodman*, 150 Wn.2d 774, 778, 83 P.3d 410 (2004); *Sibert*, 168 Wn.2d at 311-12 (plurality opinion)). The identity of the controlled substance is an essential element of the offense of unlawful possession of a controlled substance (methamphetamine) under RCW 69.50.4013(1). *Gonzalez*, 2 Wn. App. 2d at 105-10.

In *Gonzalez*, the defendant was charged with unlawful possession of a controlled substance (methamphetamine), under RCW 69.50.4013. *Id*. at 101. The to-convict instruction stated "the defendant possessed a controlled substance[.]" *Id*. at 104. It did not specify the nature of the controlled substance, but it did refer to the offense "as charged in Count II." *Id*. On appeal, Division II agreed with the defendant "that because RCW 69.50.4013 imposes different statutory maximum sentences for possession of certain quantities of marijuana and otherwise authorizes possession of recreational and medical marijuana, the identity of the controlled substance that the defendant possessed is an essential element of the crime of unlawful possession of a controlled substance." *Id*. at 105-06. The court reasoned that "RCW 69.50.4013(2), (3), and (5) have the effect of imposing different maximum sentences based on the type and amount of

the controlled substance possessed." *Id*. at 110. The court further reasoned "[w]ithout specifying the identity of the controlled substance, the to-convict instruction could allow the jury to convict a defendant and impose a class C sentence based on the possession of *any* controlled substance, including any amount of *marijuana*." *Id*.

Thus, the *Gonzalez* court found "the omission of the essential element of the identity of the controlled substance from the to-convict instruction is error." *Id*. at 111. The court held "the error in omitting the essential element of the identity of the controlled substance is subject to a harmless error analysis as to the conviction but . . . an unauthorized sentence is not subject to a harmless error analysis." *Id*. at 112.

With respect to the sentence, the court found "[w]ithout a finding regarding the nature of the controlled substance, the jury's verdict did not provide a basis upon which the trial court could impose a sentence based on possession of methamphetamine." *Id*. at 114 (citing *Clark-El*, 196 Wn. App. at 624). The court reasoned "'[t]he jury's finding that [Gonzalez possessed] an unidentified 'controlled substance' authorized the court to impose only the lowest possible sentence for [unlawful possession of a controlled substance.]'" *Id*. (quoting *Clark-El*, 196 Wn. App. at 624) (second and third alterations in original). The court remanded the case for "resentencing on the unlawful possession of a controlled substance conviction to impose a misdemeanor sentence. . . ." *Id*. at 114, 116.

More recently in *State v. Murillo*, Division III found the "omission of the identity of the controlled substance in the to-convict instruction constituted harmful error for purposes of sentencing." *State v. Murillo*, No. 35695-5-III, 2019 WL 4805332, at *9, 12 (Wash. Ct. App. Oct. 1, 2019); *see also* GR 14.1(a) (authorizing citation to unpublished opinions of the Court of Appeals filed on or after March 1, 2013, as nonbinding authority). In *Murillo*, neither the to-convict instruction nor the verdict form listed the controlled substance as methamphetamine. *Id*. at 12. The verdict form merely requested the jury convict or acquit the defendant "as charged." *Id*. at 12. This "as charged" language was missing from the to-convict instruction. *Id*. The Court remanded for resentencing, holding the felony drug possession conviction's sentence must be that of a misdemeanor. *Id*. at 12.

Here, as in *Gonzalez*, Ms. Gardner was charged with unlawful possession of a controlled substance (methamphetamine), under RCW 69.50.4013. (CP 86-87). Also as in *Gonzalez*, the to-convict instruction given to the jury did not require proof that the controlled substance possessed by Ms. Gardner was methamphetamine. (CP 287; RP 436). Instead, it merely required proof that Ms. Gardner "possessed a controlled substance." (CP 287; RP 436). Further, unlike *Gonzalez*, the to-convict instruction given here makes no reference to the offense "as charged." (CP 287; RP 286); *see Gonzalez*, 2 Wn. App. 2d at 104 (the to-convict instruction referred to the offense "as charged in Count II."); *see Clark-El*,

196 Wn. App. at 619-20 (in finding the to-convict instruction omitted an essential element, noting that it did not include the "as charged" language).

Therefore, the jury's finding that Ms. Gardner possessed an unidentified controlled substance authorized the trial court to impose only the lowest possible sentence for unlawful possession of a controlled substance, which is a misdemeanor sentence. *See Gonzalez*, 2 Wn. App. 2d at 114 (quoting *Clark-El*, 196 Wn. App. at 624); *Murillo*, 2019 WL 4805332, at *12 (holding lowest offense is possession of marijuana of forty grams or less under RCW 69.50.4014); *and also* RCW 69.50.4013(2) ("Except as provided in RCW 69.50.4014, any person who violates this section is guilty of a class C felony punishable under chapter 9A.20 RCW."); RCW 69.50.4014 ("Except as provided in RCW 69.50.401(2)(c) or as otherwise authorized by this chapter, any person found guilty of possession of forty grams or less of marijuana is guilty of a misdemeanor.").

Including the "Possession of a Controlled Substance—other than Marijuana in Count II" language in the verdict form does not remedy the error in the to-convict instruction. (CP 290); *see, e.g., State v. Ibrahim,* No. 75770-9-I, 2018 WL 418894, at *2-3 (Wash. Ct. App. Jan. 16, 2018) (finding that including the "as charged" language in the jury verdict does not remedy the error in the to-convict instruction); *see also* GR 14.1(a) (authorizing citation to unpublished opinions of the Court of Appeals filed on or after March 1, 2013, as nonbinding authority). "[A] reviewing court may not rely on other instructions to supply the

element missing from the 'to convict' instruction." *State v. DeRyke*, 149 Wn.2d 906, 910, 73 P.3d 1000 (2003). "'[T]he jury has a right to regard the 'to convict' instruction as a complete statement of the law and should not be required to search other instructions in order to add elements necessary for conviction.'" *Mills*, 154 Wn.2d at 8 (quoting *State v. Oster*, 147 Wn.2d 141, 147, 52 P.3d 26 (2002)). While the verdict form states the jury found Ms. Gardner guilty of the "crime of Possession of a Controlled Substance—other than Marijuana in Count II", none of the other instructions advised the jury what controlled substance "Count II" entails. (CP 273-292; RP 429-438). This case is similar to *State v. Barbarosh*, where the jury verdict only encompassed "Unlawful Possession of a Controlled Substance as charged in Count I." *State v. Barbarosh*, 10 Wn. App. 2d 408, 418, 448 P.3d 74 (2019). The *Barbarosh* Court decided that "[w]ithout an express jury finding based on the instructions as a whole, the trial court was not authorized to sentence [the defendant] as if the jury had found he had possessed methamphetamine." *Id*.

"The constitutional right to jury trial requires that a sentence must be authorized by a jury's verdict." *Gonzalez*, 2 Wn. App. 2d at 113 (quoting *Clark-El*, 196 Wn. App. at 624) (internal quotation marks omitted). The sentence for possession of methamphetamine imposed here was not authorized by the jury verdict. Remand for resentencing is required, to impose a misdemeanor sentence.

F. CONCLUSION

For the reasons stated herein, Ms. Gardner respectfully requests that this Court grant review pursuant to 13.4(b).

Respectfully submitted this 16th day of September, 2020.

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IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON Plaintiff/Respondent vs. PAULA MACHELE GARDNER Defendant/Appellant	))))))))	COA No. 36600-6-III PROOF OF SERVICE

I, Laura M. Chuang, of counsel to the assigned counsel for the Appellant herein, do hereby certify under penalty of perjury that on September 16, 2020, I deposited for mailing by U.S. Postal Service first class mail, postage prepaid, a true and correct copy of the attached Petition for Review to:

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Dated this 16th day of September, 2020.

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APPENDIX A

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In the Office of the Clerk of Court
WA State Court of Appeals, Division III

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION THREE

STATE OF WASHINGTON, Respondent, v. PAULA M. GARDNER, Appellant.	)	No. 36660-0-III OPINION PUBLISHED IN PART

KORSMO, A.C.J. — Paula Gardner appeals from convictions for first degree burglary and possession of a controlled substance. In the published portion of this opinion, we address her challenge to the verdict form used for the possession count. In the unpublished portion, we address her challenge to the State's withdrawal from its plea agreement with Ms. Gardner. Overall, we affirm the convictions and remand to strike a provision of the sentence.

FACTS

Ms. Gardner was tried in the Lincoln County Superior Court on the two noted charges after the State was able to withdraw Ms. Gardner's guilty plea to a criminal trespassing charge due to her breach of a cooperation agreement. At trial, the evidence

showed that Ms. Gardner possessed methamphetamine at the time she was arrested for burglary.

The charging document accused her of possessing methamphetamine. The elements instruction required the jury to find beyond a reasonable doubt that Ms. Gardner "possessed a controlled substance." Another instruction advised the jury that methamphetamine was a controlled substance. The verdict form directed the jurors to determine whether Ms. Gardner was guilty

> of the crime of Possession of a Controlled Substance—other than Marijuana in Count II.

Clerk's Papers at 292.

The jury convicted Ms. Gardner on the two charged counts. The trial court imposed an exceptional sentence composed of consecutive terms due to the defendant's exceptionally high offender score. Ms. Gardner timely appealed to this court. A panel considered her appeal without conducting oral argument.

ANALYSIS

The appeal raises challenges to the revocation of the original guilty plea, a provision of the judgment and sentence, and to the verdict form used on the drug possession count. We address the latter issue first.

Ms. Gardner argues that the failure of either the elements instruction or the verdict form to identify methamphetamine as the drug she possessed resulted in an unauthorized

sentence. This issue is one that has divided the appellate courts. *See State v. Sibert*, 168 Wn.2d 306, 230 P.3d 142 (2010). She primarily relies on the Division One decision in *State v. Clark-El*, 196 Wn. App. 614, 618, 384 P.3d 627 (2016), and this court's adoption of *Clark-El* in *State v. Barbarosh*, 10 Wn. App. 2d 408, 448 P.3d 74 (2019).

Those cases stand for the proposition that where an elements instruction does not identify the controlled substance, a general verdict form that merely finds a defendant guilty of "possession of a controlled substance" does not authorize the trial court to sentence as if the offender possessed a particular controlled substance. *Barbarosh*, 10 Wn. App. 2d at 418. Instead, the court must sentence consistent with the lowest possible drug possession offense, misdemeanor possession of marijuana. *Id*. at 418-419.

However, a verdict form that identifies the controlled substance found by the jury is sufficient to authorize sentencing for that particular substance, even if the elements instruction did not specify a specific controlled substance. *State v. Rivera-Zamora*, 7 Wn. App. 2d 824, 828-830, 435 P.3d 844 (2019). Courts must look to the entirety of the jury instructions in determining whether a jury verdict authorizes a particular sentence. *Barbarosh*, 10 Wn. App. 2d at 410-411, 418.

The drug sentencing table places all felony controlled substance possession cases in seriousness level one. RCW 9.94A.518. The assigned sentencing level is one of two components of sentencing under the drug sentencing grid. RCW 9.94A.517. In contrast,

marijuana possession less than 40 grams is sentenced as a misdemeanor in accordance with RCW 69.50.4014.

Here, the verdict form reflects the jury's determination that Ms. Gardner possessed a controlled substance other than marijuana. We conclude that form is adequate to take this case outside of *Barbarosh*. The jury expressly found that the appellant possessed a controlled substance that was not marijuana. Although a negative finding, it was sufficient to place Ms. Gardner's offense within the scope of the felony drug sentencing grid because it eliminated marijuana as a basis for the conviction.

The verdict form authorized the sentence imposed. The court did not err.

A majority of the panel having determined that only the foregoing portion of this opinion will be printed in the Washington Appellate Reports and that the remainder, having no precedential value, shall be filed for public record pursuant to RCW 2.06.040, it is so ordered.

Ms. Gardner also challenges the revocation of her cooperation agreement and ensuing withdrawal of her original guilty plea as well as the imposition of community supervision fees. The State concedes error on the latter argument and we accept the concession. The trial court may not impose discretionary LFOs on indigent defendants. *State v. Ramirez*, 191 Wn.2d 732, 750, 426 P.3d 714 (2018). Accordingly, we remand for the court to strike the supervision fee.

The revocation issue is the primary focus of the appellate briefing. We have explained the basic principles governing this issue:

> A plea agreement is a contract with constitutional implications. *In re Pers. Restraint of Lord*, 152 Wn.2d 182, 188-89, 94 P.3d 952 (2004). If a defendant breaches a plea agreement, the State may rescind it. *State v. Thomas*, 79 Wn. App. 32, 36-37, 899 P.2d 1312 (1995). However, before doing so the State must prove breach by a preponderance of the evidence. *In re Pers. Restraint of James*, 96 Wn.2d 847, 850-51, 640 P.2d 18 (1982).

State v. Townsend, 2 Wn. App. 2d 434, 438, 409 P.3d 1094 (2018).

We review the trial court's decision to withdraw a guilty plea for abuse of discretion. *State v. Blanks*, 139 Wn. App. 543, 548, 161 P.3d 455 (2007). Findings of fact are reviewed for substantial evidence. *Id*. Discretion is abused when it is exercised on untenable grounds or for untenable reasons. *State ex rel. Carroll v. Junker*, 79 Wn.2d 12, 26, 482 P.2d 775 (1971). Substantial evidence is that sufficient to persuade a fair-minded, rational person of the truth of the evidence. *World Wide Video, Inc. v. City of Tukwila*, 117 Wn.2d 382, 387, 816 P.2d 18 (1991).

The court conducted two hearings, with Ms. Gardner represented by different attorneys at each hearing, concerning the revocation of the agreement and withdrawal of the plea. Although the State's case against both Gardner and Michael Jackson on the burglary case was strong, the State offered Gardner the trespassing charge after she reported that both Jackson and a mutual friend, Robert Brown, had threatened to kill her. The reduced charge would protect Gardner and gain her testimony against both men. The

State moved to revoke the agreement after finding no corroboration of the threats and learning that Gardner had lied to law enforcement concerning her relationship with the two men.

After the reconsideration hearing, the court entered extensive findings that include a lengthy recitation of the evidence presented by each side.[1] Although Ms. Gardner properly assigns error to numerous findings, much of her argument is misplaced. The question on appeal is whether the evidence supported the findings the court did make rather than whether the court should have found Ms. Gardner's version of events a more credible explanation. Since she does not point to specific evidentiary problems with the findings the court did make (other than her contrary testimony), we need not discuss the basis for those findings.

At issue here was whether Ms. Gardner misled the prosecutor and law enforcement. The trial court found that she did do so, leading the State to dismiss charges against the two men in light of the lack of evidence and Gardner's self-impugned credibility. Despite alleging that she feared the two men, she continued to see them and even spent nights at Mr. Jackson's house. She also fabricated evidence of threats. The

[1] Unless a court is going to expressly find or reject each statement, a detailed recitation of the evidence is unnecessary and a summary of evidence presented is sufficient to set the stage for the trial judge's findings and conclusions. This court will see the evidence presented through the transcript of the hearing and/or the filings designated amongst the clerk's papers.

trial court concluded that, far from being an abused victim, Ms. Gardner was the ringleader who orchestrated the group's criminal activities.

The evidence supported the trial court's determination that Ms. Gardner falsified a story that she was in danger from the two men. Since the need to protect her and prosecute the threats was the basis for offering her the initial deal, the State understandably sought to withdraw from the agreement. The trial court had very tenable reasons for permitting it.

The court did not abuse its discretion.

Affirmed and remanded.

Korsmo, A.C.J.

WE CONCUR:

Fearing, J.

Lawrence-Berrey, J.

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September 16, 2020 - 10:39 AM

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