SUPREME COURT NO.
99395-5

COA NO. 36140-3-III

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,
Respondent,

v.

MICHAEL CARGILL,
Petitioner.

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

Spokane County Cause No. 17-1-04506-32

The Honorable Raymond F. Clary, Judge

PETITION FOR REVIEW

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I. IDENTITY OF PETITIONER

Petitioner Michael Cargill, the appellant below, asks the Court to review the decision of Division III of the Court of Appeals referred to in Section II below.

II. COURT OF APPEALS DECISION

Michael Cargill seeks review of the Court of Appeals unpublished opinion entered on December 15, 2020. A copy of the opinion is attached.

III. ISSUES PRESENTED FOR REVIEW

> The car theft and possession of a stolen vehicle statutes are intended to penalize theft offenses related to "family cars" and do not apply to vehicle that are designed or purposes other than passenger transportation. Should This Court grant review of Mr. Cargill's case when he was convicted of possession of a stolen vehicle charge based on a dirt bike that was designed only for recreational use and could not be legally driven on public roadways and when the Court of Appeals' decision conflicts with This Court's prior holdings in *Barnes* and *Wolvelaere*?

IV. STATEMENT OF THE CASE

Michael Cargill was helping a friend work on a dirt bike outside of the friend's apartment building. RP 269-70.[1] Mr. Cargill's friend had taken the dirt bike out of his garage and asked Mr. Cargill to help him get

[1] Unless otherwise noted, all citations to the verbatim report of proceedings refer to the chronologically numbered volumes spanning 3/2/18 through 6/12/18.

it running. RP 269-70. Mr. Cargill had assumed that the friend legally owned the bike. RP 270.

The dirt bike was a Yamaha YZ426. CP 6. It did not have a headlamp, a taillight, brake lights, rearview mirrors, a windshield, or turn signals. *See* CP 20-21; Ex. P1-P3.

Eventually, the police showed up. RP 272. Mr. Cargill was the only person outside with the dirt bike at the time. RP 272-73. The police arrested Mr. Cargill for possession of a stolen motor vehicle. RP 275.

When he was being booked into jail, the police learned that Mr. Cargill had a small amount of methamphetamine and some "shaved keys" in his possession. RP 275-76, 278. They added charges of drug possession and possession of motor vehicle theft tools. CP 74-75.

Mr. Cargill brought a *Knapstad* motion to dismiss the possession of a stolen motor vehicle charge, arguing that the dirt bike did not qualify as a motor vehicle under the relevant statute and recent Supreme Court caselaw. CP 5-21.

The court denied Mr. Cargill's motion to dismiss the charge. CP 25. At the motion hearing, the judge explained that he was satisfied that a Yamaha YZ426 qualified as a motor vehicle because the judge had raced motocross in high school and that model had been a "big deal" when it came out. RP (2/1/18) 14-15. The judge also noted that many dirt bikes,

including the Yamaha YZ426, cost thousands of dollars even though they are not "street legal." RP (2/1/18) 14-15.

At Mr. Cargill's trial, the police explained that the dirt bike had been reported stolen a few days before they encountered Mr. Cargill working on it. RP 223-24.

Mr. Cargill also testified at trial. RP 267-90. He admitted to possessing the drugs and shaved keys but said that he had not known that the bike was stolen. RP 275-76, 278.

The jury found Mr. Cargill guilty of all three charges. CP 135-37. Mr. Cargill timely appealed. CP 222. The Court of Appeals affirmed his convictions in an unpublishes opinion. *See* Appendix.

V. ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

The Supreme Court should accept review and hold that the state presented insufficient evidence to convict Mr. Cargill of possession of a stolen motor vehicle because the dirt bike does not qualify as a "motor vehicle" under This Court's interpretation of the statute. The Court of Appeals' decision in this case conflicts with This Court's prior decisions in *Van Wolvelaere* and *Barnes*. RAP 13.4(b)(1).

Dirt bikes are designed for "recreational use." *See e.g.*, *Hudnell v. Allstate Ins. Co.*, 190 Ariz. 52, 54, 945 P.2d 363 (Ariz. Ct. App. 1997).

The dirt bike at issue in Mr. Cargill's case did not have a headlamp, a taillight, brake lights, rearview mirrors, a windshield, or turn

signals. *See* CP 20-21; Ex. P1-P3. Accordingly, the bike could not be legally "operated on a public road, street, or highway." *See* RCW 46.61.705(2) (delineating the requirements for permissible operation of an off-road motorcycle on public roads); *See also* MERRIAM-WEBSTER ONLINE DICTIONARY (2018), *available at* https://www.merriam-webster.com/dictionary/dirt%20bike (last accessed 12/13/18) (defining the term "dirt bike" as "a usually lightweight motorcycle designed for operation on unpaved surfaces").

Under This Court's interpretation of the relevant statutes, the dirt bike at issue in Mr. Cargill's case did not qualify as a "motor vehicle" under the RCW chapter related to auto theft. *See State v. Wolvelaere*, 195 Wn.2d 597, 600-01, 461 P.3d 1173 (2020); *State v. Barnes*, 189 Wn.2d 492, 496–98, 403 P.3d 72 (2017). The trial court erred by denying Mr. Cargill's *Knapstad* motion to dismiss the charge of possession of a stolen vehicle. *See State v. Chouinard*, 169 Wn. App. 895, 899, 282 P.3d 117 (2012) *review denied*, 176 Wn.2d 1003, 297 P.3d 67 (2013).

In order to convict Mr. Cargill of possession of a stolen motor vehicle, the state was required to prove that he knowingly possessed a stolen motor vehicle. *See* RCW 9A.56.068; *See also State v. Tyler*, 195 Wn. App. 385, 402, 382 P.3d 699 (2016), *review granted in part*, 189

Wn.2d 1016, 404 P.3d 497 (2017), and *aff'd on other grounds*, 191 Wn.2d 205, 422 P.3d 436 (2018) (regarding the knowledge requirement).

This Court undertook extensive statutory construction of the term "motor vehicle" in *Barnes* and *Wolvelaere*, limiting the meaning of that term as it applies to criminal charges for theft of a motor vehicle. *See Barnes*, 189 Wn.2d at 496-98; *Wolvelaere*, 195 Wn.2d at 600-01.[2] This Court should grant review of Mr. Cargill's case because the Court of Appeals failed to properly apply This Court's holdings from *Barnes* and *Wolvelaere*. RAP 13.4(b)(1).

The *Barnes* court held that a riding lawnmower does not qualify as a "motor vehicle" under the auto theft statute. *Id.* The *Barnes* court noted that the dictionary definitions of the terms "motor vehicle" and "automotive," could, conceivably, include a riding lawnmower. *Id.* at 496-97. However, after looking to the legislative history and purpose of the statute, the This Court held that the legislature intended it to encompass "cars and other automobiles designed for transport of people or cargo, *but*

[2] Though *Barnes and Wolvelaere* dealt with charges of theft of a motor vehicle, the reasoning of those cases applies with equal force to Mr. Cargill's charge for possession of a stolen motor vehicle because the statutes are part of the same RCW chapter and were enacted as part of the same bill, indicating that the legislature intended for the term "motor vehicle" to have the same meaning in each statute. *See* LAWS OF 2007, ch. 199; RCW 9A.56.068; RCW 9A.56.065.

not machines designed for other purposes yet capable of transporting people or cargo." *Id.* at 496-97 (emphasis added).

The *Barnes* court relied heavily on the lengthy findings made by the legislature upon the enactment of the statutes related to auto theft and possession of a stolen vehicle. *Id.* at 497-98 (*citing* LAWS OF 2007, ch. 199, sec. 1). Specifically, the legislature treated the terms "motor vehicle," "vehicle," "car," and "auto" as synonyms in its findings. *Barnes*, 189 Wn.2d at 497; LAWS OF 2007, ch. 199, sec. 1.

The legislature found that "[t]he family car is a priority of most individuals and families." *Id*. (*citing* LAWS OF 2007, ch. 199, sec. 1(1)(a)). The legislature further found that:

> The family car is typically the second largest investment a person has next to the home, so when a car is stolen, it causes a significant loss and inconvenience to people, imposes financial hardship, and negatively impacts their work, school, and personal activities.

LAWS OF 2007, ch. 199, sec. 1(1)(a).

Relying on the importance of the "family car" to Washingtonians and on the fact that auto theft rates had risen in the years preceding 2007 even while other property crimes declined, the legislature adopted the statutes to provide heftier penalties for theft and possession of stolen "motor vehicles" than for other types of theft or possession of stolen property. *Id*. at sec. 1(1)(b).

Because of the legislature's focus on the "family car," the *Barnes* court applied the cannon that appellate courts must "consistent with other relevant statutory language, construe a general term so as to further [the statute's] specific purpose. *Barnes*, 189 Wn.2d at 498 (*citing Yates v. United States*, 135 S.Ct. 1074, 1080, 191 L.Ed.2d 64 (2015)). Accordingly, This Court held the trial court properly dismissed the auto theft charge in *Barnes* because, "Barnes did not attempt to steal a 'family car,' nor is the riding lawn mower he attempted to take a comparable investment to a family car." *Id.*

In short, the *Barnes* court held that, in enacting the statute under which Mr. Cargill was convicted, the legislature "explicitly indicated it intended to focus this statute on cars and other automobiles." *Id.*

The dirt bike at issue in Mr. Cargill's case is neither a car nor an "automobile." *See* MERRIAM-WEBSTER ONLINE DICTIONARY (2018); *available at* https://www.merriam-webster.com/dictionary/automobile (last accessed 12/21/18) (defining "automobile" as "a usually four-wheeled automotive vehicle designed for passenger transportation"). Nor is the dirt bike a "family car" or "a comparable investment to a family car." *Barnes*, 189 Wn.2d at 498.

Like the riding lawnmower in *Barnes*, the dirt bike is capable of transporting people but is "designed for other purposes." *Id.* at 496-97.

Specifically, the dirt bike is designed for recreation, not transportation. *See Hudnell*, 190 Ariz. at 54.

More recently, in *Wolvelaere*, This Court further clarified that – because the Washington criminal code explicitly incorporates traffic laws into the definition of "motor vehicle" – a court should properly refer to those statutes in order to determine whether a mode of conveyance qualifies as a motor vehicle under the statutes related to motor vehicle theft. *Wolvelaere*, 195 Wn.2d at 600–01.

Washington traffic laws define "motor vehicle" as, *inter alia*, a "device capable of being moved upon a public highway and in, upon, or by which any persons or property is or may be transported or drawn upon a public highway." *Id.* at 601; RCW 46.04.670. Accordingly, a vehicle is a "motor vehicle" for purposes of the act only if it can be lawfully used "*on a public highway." Id.* at 602 (emphasis in original).

The *Wolvelaere* court was tasked with determining whether a snowmobile qualified as a motor vehicle under the statute criminalizing theft of a motor vehicle. *Id.* The court determined that a snowmobile was a motor vehicle because the traffic codes delineated certain circumstances in which it could be lawfully driven on a public highway. *Id.* at 603-04; RCW 46.10.470.

The dirt bike at issue in Mr. Cargill's case, however, could not be legally driven on a public roadway because it does not have lights, a windshield, or turn signals. *See* Ex. P1-P3; CP 20-21; RCW 46.61.705(2) (delineating the requirements for permissible operation of an off-road motorcycle on public roads).

The Court of Appeals acknowledges that the question of whether the dirt bike qualifies as a "motor vehicle" turns on the question of whether it could have been legally driven on a public roadway under the relevant traffic laws. Appendix, pp. 4-5. Even so, the Court of Appeals affirms Mr. Cargill's conviction because dirt bikes are "legally authorized to convey humans on the roadways *in some circumstances*." Appendix, p. 5 (emphasis added).

But those circumstances were not present in Mr. Cargill's case. Unlike the snowmobile at issue in *Wolvelaere*, the specific dirt bike that Mr. Cargill was alleged to have possessed could *never* have been legally driven on a public roadway. *See* Ex. P1-P3; CP 20-21; RCW 46.61.705(2). The Court of Appeals misapplies This Court's ruling in *Wolvelaere*.

Applying This Court's statutory construction analysis in *Barnes* and *Wolvelaere*, no rational jury could have found beyond a reasonable doubt that Mr. Cargill possessed a stolen "motor vehicle" when he worked on the dirt bike. *Barnes*, 189 Wn.2d at 496-98; *Chouinard*, 169 Wn. App.

at 899. The Court of Appeals should have reversed Mr. Cargill's conviction for possession of a stolen motor vehicle. *Id.*

VI. CONCLUSION

The Court of Appeals decision in this case conflicts with This Court's prior holdings in *Barnes* and *Wolvelaere*. The Supreme Court should accept review pursuant to RAP 13.4(b)(1).

Respectfully submitted January 5, 2021.

Skylar T. Brett, WSBA No. 45475
Attorney for Appellant/Petitioner

CERTIFICATE OF SERVICE

I certify that I retained a copy of the Petition for Review for appellant at:

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and I sent an electronic copy to

Spokane County Prosecuting Attorney
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through the Court's online filing system, with the permission of the recipient(s).

In addition, I electronically filed the original with the Court of Appeals.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed at Seattle, Washington on January 5, 2021.

Skylar T. Brett, WSBA No. 45475
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APPENDIX:

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CASE # 361403
State of Washington v. Michael Patrick Cargill
SPOKANE COUNTY SUPERIOR COURT No. 171045064

Dear Counsel:

Enclosed please find a copy of the opinion filed by the Court today.

A party need not file a motion for reconsideration as a prerequisite to discretionary review by the Supreme Court. RAP 13.3(b); 13.4(a). If a motion for reconsideration is filed, it should state with particularity the points of law or fact which the moving party contends the court has overlooked or misapprehended, together with a brief argument on the points raised. RAP 12.4(c). Motions for reconsideration which merely reargue the case should not be filed.

Motions for reconsideration, if any, must be filed within twenty (20) days after the filing of the opinion. Please file the motion electronically through the court's e-filing portal or if in paper format, only the original motion need be filed. If no motion for reconsideration is filed, any petition for review to the Supreme Court must be filed in this court within thirty (30) days after the filing of this opinion (may be filed by electronic facsimile transmission). The motion for reconsideration and petition for review must be <u>received</u> (not mailed) on or before the dates they are due. RAP 18.5(c).

Sincerely,

Renee S. Townsley

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FILED
DECEMBER 15, 2020
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. MICHAEL PATRICK CARGILL, Appellant.	)))))))))	No. 36140-3-III UNPUBLISHED OPINION

KORSMO, J. — Michael Cargill appeals from convictions for possession of a stolen motor vehicle, possession of a controlled substance, and possession of a motor vehicle theft tool. We affirm.

FACTS

Following a report that a shop had been broken into and a pickup truck and dirt bike stolen, police recovered the stolen pickup truck and received a tip about the location of the missing dirt bike. Sergeant Kurt Vigesaa followed up on the tip and discovered Michael Cargill working on the dirt bike. The sergeant arrested Cargill and transported him to jail. A search at the jail uncovered methamphetamine and shaved car keys.

Sergeant Vigesaa testified at trial that he interviewed Cargill in the patrol car and was told that an unknown person had brought the dirt bike to the house. Vigesaa told

Cargill he was acting deceptively and not being honest with him. Cargill then admitted that his brother stole the bike and delivered it to him; he had lied to the officer initially in order to protect his brother. Defense counsel did not object to the testimony.

Cargill testified at trial that he did not know that the bike was stolen and had believed it belonged to a friend. He told Vigesaa that he did not know to whom the bike belonged. He knew that his brother had stored stolen property at the house, but initially told the officer that there was no other stolen property present, which was untrue. He admitted being "deceptive" with the officer.

The jury found Mr. Cargill guilty on the three noted counts. Mr. Cargill timely appealed to this court. A panel heard oral argument October 23, 2019, and soon thereafter stayed the case due to the Washington Supreme Court granting review of the primary issue presented here. The stay was lifted June 18, 2020, upon the issuance of the mandate in *State v. Van Wolvelaere*, 195 Wn.2d 597, 461 P.3d 1173 (2020).

The parties filed supplemental briefs concerning *Van Wolvelaere*. The panel then considered the appeal without hearing further argument.

ANALYSIS

The appeal raises two issues: is a dirt bike a motor vehicle, and was counsel ineffective for not objecting to the testimony that Mr. Cargill was "deceptive"? We address the questions in the order listed, answer the first question in the affirmative, and answer the second in the negative.

Dirt Bike as Motor Vehicle

When this court initially considered this case, the governing authority was found in the fractured opinions in *State v. Barnes*, 189 Wn.2d 492, 403 P.3d 72 (2017), and this court's version of *Van Wolvelaere*.[1] Now that the Washington Supreme Court has reached a consensus, we apply their *Van Wolvelaere* opinion.

At issue here is whether a dirt bike, a form of motorcycle designed primarily for off-road use, is a "motor vehicle" within the meaning of the possession of a stolen motor vehicle statute, RCW 9A.56.068. That statute makes it a crime to possess "a stolen motor vehicle." *Id*. The statute does not define the word "motor vehicle," an oversight that has led to extensive litigation.

Mr. Cargill argues that because a dirt bike cannot legally be driven on the roadways of this state, it cannot constitute a "motor vehicle." Supp. Br. of Appellant at 2-3. The State argues that the dirt bike at issue in this case fits the definition of "motorcycle" found in the traffic code and notes that motorcycles are expressly defined as a motor vehicle per RCW 46.04.330. Supp. Br. of Resp't at 2-4.

At issue in *Van Wovelaere* was whether a snowmobile was a "motor vehicle." The *Van Wolvelaere* majority began its analysis by reference to the criminal code's definition of "vehicle" found in RCW 9A.04.110(29), noting that the criminal definition cross-

[1] *State v. Van Wolvelaere*, 8 Wn. App. 2d 705, 440 P.3d 1005 (2019), *rev'd*, 195 Wn.2d 597, 461 P.3d 1173 (2020).

referenced the definition of "motor vehicle" found in the traffic code. *Van Wolvelaere*, 195 Wn.2d at 600-601. In turn, the traffic code defines both the word "vehicle" and the word "motor vehicle." *Id*. at 601. It then combined those two definitions into the following working definition:

> So a motor vehicle is a self-propelled device (a description of its mechanics) that is capable of moving and transporting people or property on a public highway (a description of its function).

Id.

After defining the test, the court applied a two-step process—is the device in question self-propelled, and is it capable of moving people or property on the roadways? *Id*. at 602. The court concluded that a snowmobile was a self-propelled device under the traffic code, citing to RCW 46.04.546. *McFarland*, 195 Wn.2d at 602. The remaining question was whether the snowmobile was capable of moving and transporting people *on a public highway*. *Id*. The majority determined that the traffic code permitted snowmobiles on a public highway in certain circumstances. *Id*. at 603-604. The majority then concluded that a snowmobile was a motor vehicle. *Id*. at 604-606.

The parties frame their arguments against this backdrop—each acknowledging that a dirt bike is self-propelled—with the State arguing that the definition of motorcycle resolves the issue while Mr. Cargill argues that dirt bikes are not supposed to be used on the public roadways. We believe *Van Wolvelaere* resolves the argument against Mr. Cargill.

Van Wolvelaere turned on the fact that snowmobiles not only were physically capable of transporting humans on roadways, they also were legally authorized to do so in some circumstances. *Id*. at 602-604. The same can be said for dirt bikes. Not only are they motorcycles, an item that the legislature classifies as a motor vehicle, but they are designed to convey humans on hard surfaces such as dirt or concrete. They are capable of carrying people on the public roadways. Off-road motorcycles also are legally authorized to convey humans on the roadways in some circumstances. RCW 46.61.705(1).[2] Accordingly, a dirt bike is a motor vehicle under *Van Wolvelaere*.

The evidence was sufficient to support the conviction for possession of a stolen motor vehicle.

Effective Assistance of Counsel

Mr. Cargill argues that his counsel was ineffective in failing to object to Sergeant Vigesaa's testimony that he disbelieved Cargill's initial story. This argument fails to meet the heavy burden placed on such contentions.

Well-settled standards govern review of this claim. An attorney's failure to perform to the standards of the profession will require a new trial when the client has been prejudiced by counsel's failure. *State v. McFarland*, 127 Wn.2d 322, 333-335, 899 P.2d 1251 (1995). Courts must be highly deferential to counsel's decisions when

[2] The legislature also has established a process for registering off-road vehicles for on-road use. RCW 46.16A.435(1), (2).

evaluating ineffectiveness claims. A strategic or tactical decision is not a basis for finding error. *Strickland v. Washington*, 466 U.S. 668, 689-691, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984). Under *Strickland*, courts evaluate counsel's performance using a two-prong test that requires determination whether or not (1) counsel's performance failed to meet a standard of reasonableness and (2) actual prejudice resulted from counsel's failures. *Id*. at 690-692. When a claim fails one prong, a reviewing court need not consider both *Strickland* prongs. *Id*. at 697; *State v. Foster*, 140 Wn. App. 266, 273, 166 P.3d 726 (2007). If the evidence necessary to resolve the ineffective assistance argument is not in the record, the claim is not manifest and cannot be addressed on appeal. *McFarland*, 127 Wn.2d at 334.

Mr. Cargill argues that his counsel should have objected to Sergeant Vigesaa's testimony that Cargill was not honest with him. The decision was a tactical choice that cannot be second-guessed now. At trial, Mr. Cargill gave a third version of events, claiming that he did not know the vehicle was stolen and that it belonged to a friend. Previously, he first told the officer that an unknown person brought the item to the house, and then he told the officer that his brother had stolen it and brought it to the house.

The fact that he initially was being deceptive with the officer was clearly before the jury because of the two different stories he gave to the officer. The sergeant's belief that Cargill was being deceptive with him added nothing to the narrative other than to

explain why he continued to ask about the ownership of the dirt bike.[3] The statement did not constitute significant prejudice under these circumstances and counsel understandably would not want to call further attention to the conflicting stories by objecting.

Mr. Cargill has not established that his counsel erred, let alone that he was significantly prejudiced by the unchallenged testimony. Accordingly, he has not met his burdens under *Strickland*. Counsel did not perform ineffectively.

Affirmed.

A majority of the panel has determined this opinion will not be printed in the Washington Appellate Reports, but it will be filed for public record pursuant to RCW 2.06.040.

Korsmo, J.

WE CONCUR:

Pennell, C.J.

Siddoway, J.

[3] It might have been a relevant fact if the voluntariness of the statement was at issue or if the nature of the interrogation was somehow of concern at trial.

LAW OFFICE OF SKYLAR BRETT

January 05, 2021 - 9:42 AM

Transmittal Information

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