

No. 40801-5-II

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THE COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON
BY SIB
DEPUTY

STATE OF WASHINGTON,

Respondent,

vs.

MICHAEL A. LAR,

Appellant.

Appeal from the Superior Court of Washington for Lewis County

Respondent's Brief

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I. ISSUES

- A. Did the trial court error when it denied Lar's motion to suppress evidence?
- B. Was Lar's trial counsel ineffective for failure to timely bring a motion to suppress evidence?
- C. Did the trial court error by failing to dismiss a juror who failed to disclose an attenuated relationship with one of the witnesses?
- D. Did the State adequately prove Lar's prior convictions for purposes of sentencing Lar as a persistent offender?

II. STATEMENT OF THE CASE

The State agrees that Lar's version of the statement of the case is adequate for purposes of this response except as supplemented in the argument section.

ARGUMENT

A. THE TRIAL COURT PROPERLY DENIED LAR'S MOTION TO SUPPRESS EVIDENCE.

Lar filed two motions to suppress evidence in March 2010. CP 40-43. The first motion Lar filed was on March 15, 2010, although the signature line is dated March 8, 2010. CP 40-41. The March 15th motion is for suppression of Lar's medical records that were seized by law enforcement. CP 40-41. The second motion Lar filed was on March 16, 2010 and it requested all evidence

obtained from Lar's warrantless seizure and subsequent search be suppressed¹. CP 42-43. The trial court entertained Lar's motion in regards to his medical records as a motion in limine the first day of trial. RP1 15-19, 24-28². The trial court denied hearing Lar's second motion, filed on March 16, 2010 due to its untimely filing. RP1 23.

1. The Trial Court Did Not Error When Refusing To Entertain Lar's Untimely Motion To Suppress Evidence.

Admissibility of evidence determinations by the trial court are reviewed under an abuse of discretion standard. *State v. Finch*, 137 Wn.2d 792, 810; 975 P.2d 967 (1999)(citations omitted). "A trial court abuses its discretion only when its decision is manifestly unreasonable or is based on untenable reasons or grounds." *State v. C.J.*, 148 Wn.2d 672, 686, 63 P.3d 765 (2003), *citing State v. Stenson*, 132 Wn.2d 668, 701, 940 P.2d 1239 (1997). A trial court's conclusions of law are reviewed de novo. *State v. Johnson*, 128 Wn.2d 431, 443, 909 P.2d 293 (1996). A defendant's motion

¹ In Appellant's brief Lar refers to a motion filed on April 15, 2010, but discusses the motion that was filed on March 16, 2010.

² In an attempt to be somewhat consistent with Appellant's citations to the record the state will cite to the record as follows: there are six volumes for the jury trial, March 23, 2010 – RP1, March 24, 2010 – RP2, March 26, 2010 – RP3, March 30, 2010 there are two volumes, the first volume in the morning will be – RP4a and the afternoon will be RP4b, March 31, 2010 – RP5; the three motion verbatim reports, March 10, 2010 – MRP1, March 17, 2010 – MRP2, March 23, 2010 – MRP3; Sentencing on May 26, 2010 – SRP.

to suppress evidence must be timely. *State v. Burnley*, 80 Wn. App. 571, 572, 910 P.2d 1294 (1996).

A motion to suppress evidence in a criminal case is governed by CrR 3.6.

Motions to suppress physical, oral or identification evidence, other than motion pursuant to rule 3.5 shall be in writing supported by affidavit or document setting forth the facts the moving party anticipates will be elicited at hearing, and a memorandum of authorities in support of the motion. Opposing counsel may be ordered to serve and file a memorandum of authorities in opposition to the motion. The court shall determine whether an evidentiary hearing is required based upon the moving papers. If the court determines that no evidentiary hearing is required, the court shall enter a written order setting forth its reasons.

CrR 3.6. The computation of time for filing 3.6 motions is governed by CR 6. CrR 8.1. "A written motion, other than one which may be heard ex parte, and notice of the hearing shall be served no later than 5 days before the time of the specified hearing, unless a different period is fixed by these rules or by order of the court." CR 6(d). Lewis County Superior Court has adopted local court rules governing the service and filing of motions and responses. LCR 5.

Notwithstanding any provision of CR 6(d) to the contrary, **a party filing any motion shall serve and file such motion no later than seven (7) court days prior to the date noted for argument on the motion** . . . Unless other arrangement are made with the Court Administrator, all motions shall be scheduled for

the appropriate Wednesday or Friday Motion Docket and heard by the Motion Judge or by the Court Commissioner.

LCR 5(A)(emphasis added). The local court rule also allows for sanctions and terms to be imposed for failing to comply with the rule, including the trial court's ability to strike any of the documents filed in violation of the rule. LCR 5(G).

In Lar's case the motion to suppress evidence was filed with the Lewis County Clerk's Office on Tuesday, March 16, 2010. CP 42-43. The trial started on Wednesday, March 24, 2010, six court days after Lar filed his motion to suppress. RP1 1; CP 42-43.

Under the plain language of the local court rule, Lar's motion to suppress was not timely filed and the trial court properly refused to consider it. LCR 5(A) and (G). The trial court did not abuse its discretion, therefore this court should deny Lar's request to reverse and remand for a new trial.

2. Even If The Trial Court Had Entertained Lar's Motion To Suppress Evidence, Lar Would Not Have Prevailed.

While the State is not conceding that the trial court erred in denying to hear Lar's untimely filed motion, *arguendo*, if the court had entertained the motion it would have been denied. People have a right to not have government unreasonably intrude on one's

private affairs. U.S. Const. amend IV. Probable cause is required to be established prior to the government obtaining a warrant to search. U.S. Const. amend IV. Article I, section 7, of the Washington State Constitution protects the privacy rights of the citizens of Washington State. The right to privacy in Washington State is broader than right under the Fourth Amendment of the United States Constitution. Const. art. I, § 7; *State v. Ladson*, 138 Wn.2d 343, 348, 979 P.2d 833 (1999). Washington State places a greater emphasis on privacy and recognizes individuals have a right to privacy with no express limitations. Const. art. I, § 7; *State v. Ladson*, 138 Wn.2d at 348.

The general rule is that warrantless searches are considered per se unreasonable. *Coolidge v. New Hampshire*, 403 U.S. 443, 443, 91 S. Ct. 2022, 2026, 29 L.Ed.2d 564 (1971). It is the State's burden to show that a warrantless search falls within an exception to this rule. *State v. Houser*, 95 Wn.2d 143, 149, 622 P.2d 1218 (1980), citing *Arkansas v. Sanders*, 448 U.S. 753, 759, 99 S. Ct. 2586, 2590, 61 L.Ed.2d 235 (1979). "The exceptions to the requirement of a warrant have fallen into several broad categories: consent, exigent circumstances, searches incident to a valid arrest,

inventory searches, plain view, and *Terry*³ investigated stops.”
State v. Hendrickson, 129 Wn.2d 61, 71, 917 P.2d 563 (1996)
overruled on other grounds by *Casey v. Musladin*, 549 U.S. 70, 127
S. Ct. 649, 166 L.Ed.2d 482 (2006).

To justify a *Terry* stop under the Fourth Amendment, a police officer must be able to point specific and articulable facts which, taken together with rational inference from those facts, reasonable warrant the intrusion. *Terry v. Ohio*, 392 U.S. 1 at 21; *State v. Armenta*, 134 Wn.2d 1, 20, 948 P.2d 1280 (1997). The level of articulable suspicion necessary to support an investigation detention is “a substantial possibility that criminal conduct has occurred or is about to occur.” *State v. Kennedy*, 107 Wn.2d 1, 6, 726 P.2d 445 (1986). Probable cause is not required for a *Terry* stop because the stop is significantly less intrusive than an arrest. *Brown v. Texas*, 443 U.S. 47, 50, 99 S. Ct. 2637, 61 L. Ed. 357 (1979).

The initial detention of Lar was pursuant to a *Terry* stop. Olympia police officer Jacob Brown received information from dispatch regarding a suspicious man down at the Phoenix Inn in downtown Olympia. RP3 134. The information was that that man

³ *Terry v. Ohio*, 392 U.S. 1, 21, 88 S. Ct. 1868, 20 L. Ed.2d 889 (1968).

was bleeding pretty severely and had some sort of material wrapped around his arm. RP3 134. Officer Brown also testified that he was briefed prior to stopping Lar about the attempted bank robbery at Twin Star Credit Union in Centralia. RP3 134-135. Officer Brown stated he was informed the person he was looking for was riding in a taxi. RP3 135. Officer Brown testified:

I spotted a taxi when I was driving toward the hotel leaving from that area. I was going down State Street one direction, the taxi crossed right in front of me, a block in front of me, the same logos I was described. I got behind the taxi, I could see someone sitting in the back seat kind of crouched down a little bit. I could tell it was a white male, I could tell he had lightish or gray hair that fit the description I was given by dispatch.

RP3 135. The deputy prosecutor inquired if Officer Brown was talking about the suspect in the Centralia bank robbery and Officer Brown responded, "Yes, both the description that the person who called at the hotel gave the description from earlier in the day."

RP3 135. Officer Brown had enough evidence to conclude that there was a substantial possibility criminal conduct had occurred, there by having the necessary articulable suspicion to initiate a *Terry* stop.

Due to the information he had, Officer Brown testified that the police conducted a high risk stop, shutting down the street and

ordering Lar, who was the passenger in the cab, out of the car. RP3 136. Once Lar was detained by Olympia police, Centralia police were on the scene and according to Officer Brown's testimony, the Olympia police deferred to Centralia police who made the decision to place Lar under arrest. RP3 136.

Due to the fact that there was not a pretrial hearing, the facts regarding the establishment of probable cause for the warrantless arrest come from several different pieces of testimony. Officer Hoium fired two shots at the suspect, later identified as Lar, in the bank. RP 30-31, 111-114. There was blood in the assistant manager's office. RP4 26-27. Joey McKnight, a cab driver for Quality Taxi, picked up Lar in Centralia and gave him a ride to Peppers in downtown Olympia. RP3 69-77. Lar told Mr. McKnight he had been injured in a car accident in Chehalis and walked to Centralia. RP3 74. Mr. McKnight was suspicious of Lar's explanation of how he became injured. RP3 74. Mr. McKnight became even more suspicious after he dropped Lar off. RP3 77-78. Mr. McKnight saw that Lar had an injured arm, torn up bloody jeans and a roll of duct tape. RP3 77. Mr. McKnight reported the information to the Centralia Police. RP3 41, 78. Then there was the report of information about the injured man in the cab in

Olympia. There was probable cause for police to arrest Lar on suspicion of robbery after Olympia police conducted their *Terry* stop.

Lar's motion to suppress the evidence collected after he was arrested would not have been suppressed. This court should affirm Lar's convictions.

B. THE STATE CONCEDES THAT LAR'S TRIAL COUNSEL WAS DEFICIENT FOR FAILING TO FILE A TIMELY SUPPRESSION MOTION BUT LAR SUFFERED NO PREJUDICE AS A RESULT, THEREFORE HIS INEFFECTIVE ASSISTANCE OF COUNSEL CLAIM FAILS.

To prevail on an ineffective assistance of counsel claim Lar must show that (1) the attorney's performance was deficient and (2) the deficient performance prejudiced the defense. *State v. Reichenbach*, 153 Wn.2d 126, 130, 101 P.3d 80 (2004); *Strickland v. Washington*, 466 U.S. 688, 687, 80 L. Ed. 674, 104 S. Ct. 2052 (1984). The presumption is that the attorney's conduct was not deficient. *State v. Reichenbach*, 153 Wn.2d at 130, *citing State v. McFarland*, 127 Wn.2d 322, 335, 899 P.2d 1251 (1995). Deficient performance exists only if counsel's actions were "outside the wide range of professionally competent assistance." *Strickland*, 466 U.S. at 690. The court must evaluate whether given all the facts

and circumstances the assistance given was reasonable. *Id.* at 688.

If counsel's performance is found to be deficient, then the only remaining question for the reviewing court is whether the defendant was prejudiced. *State v. Horton*, 116 Wn. App. 909, 921, 68 P.3d 1145 (2003). Prejudice "requires 'a reasonable probability that, but for counsel's unprofessional errors, the result of the proceeding would have been different.'" *State v. Horton*, 116 Wn. App. at 921-22, citing *Strickland v. Washington*, 466 U.S. at 694.

The State concedes that Lar's trial counsel was deficient for failing to timely file a motion to suppress the evidence obtained as a result of Lar's arrest. The only analysis needed is whether Lar was prejudiced by his trial counsel's deficient performance. The motion to suppress, if heard by the trial court on its merits would not have succeeded, as argued in the above section. Therefore, Lar fails to make the required showing that but for his trial counsel's errors the result of the trial would have been different. Lar's ineffective assistance of counsel claim fails and his request for a new trial should be denied and his convictions affirmed.

C. THE TRIAL COURT DID NOT DENY LAR HIS RIGHT TO A FAIR AND IMPARTIAL JURY WHEN IT REFUSED TO DISMISS A JUROR WHO UNKOWINGLY FAILED TO DISCLOSE AN ATTENUATED RELATIONSHIP WITH ONE OF THE STATE'S WITNESSES DURING VOIR DIRE.

A person accused of a crime has an absolute right to trial by jury. U.S. Const. amend. VI; Const. art. I, § 21. A defendant has the right to have his fate decided by a fair and impartial jury. *State v. Strode*, 167 Wn.2d 222, 238, 217 P.3d 310 (2009). "An impartial jury is comprised of individual jurors who have the ability and willingness to decide a case free of bias and on the evidence presented at trial." *Id.* A juror's impartiality is a determination for the trial court and is reviewed under the abuse of discretion standard. *State v. Rempel*, 53 Wn. App. 799, 801, 770 P.2d 1058 (1989), *reversed on other grounds*, 114 Wn.2d 77, 785 P.2d 1134 (1990). It is also within the discretion of the trial court to determine a challenge to a juror for cause. *State v. Gilcrist*, 91 Wn.2d 603, 611, 590 P.2d 809 (1979). A trial court's decisions in regards to challenges for cause are reviewed for a manifest abuse of discretion. *Id.*

There is no verbatim report of the voir dire in this case. After the jury was impanelled it was brought to the court's attention that one of the jurors, Juror 32, was acquainted with one of the

State's witnesses, Mr. McKnight. RP2 54-55. The court apparently asked the jury panel during voir dire if any of the prospective jurors knew or were acquainted with any of the witnesses, and listed off the witnesses who were expected to testify. RP2 55-56. Juror number 32 did not indicate he knew any of the witnesses. RP2 55. The jury was impanelled and testimony began. Lar's trial counsel requested juror 32 be excused from the jury. RP2 55. The parties agreed it would be proper to bring juror number 32 in to the courtroom and ask him about his relationship with Mr. McKnight. RP2 55-56.

THE COURT: Please have a seat, Mr. French. A problem has come up that we need to address, that is that when I read off a list of witnesses, there was a Mr. McKnight on there. It has been reported, and Mr. McKnight confirms, the two of you know each other.

JUROR 32: Yes, we do. I did not realize it at the time because I didn't actually know his last name.

THE COURT: Okay. What was seen was a greeting between the two of you and that causes concern. Even though it was undoubtedly innocent, that still gives the wrong impression, if you understand what I mean. So we do need to explore that. Mr. Blair, do you have any questions you wish to ask?

MR. BLAIR: How do you know Mr. McKnight?

JUROR 32: He's the boyfriend of a former girlfriend of my stepson.

MR. BLAIR: How well do you know him?

JUROR 32: Just not very well at all.

MR. BLAIR: Is the fact he's a witness going to have any influence on you?

JUROR 32: No we've had not communication whatsoever during this time.

MR. BLAIR: When was the last time you talked to him?

JUROR 32: Probably longer than six months ago....

MR. WERNER: Are you going to give the testimony of Mr. McKnight any more weight then you would give any other witness?

JUROR 32: No, sir.

RP2 56-57. Lar's trial counsel again asked for Juror 32 to be dismissed. RP2 58. The State argued Juror 32's relationship to Mr. McKnight appeared to be rather attenuated and there was no showing that Juror 32 was not fair and impartial. RP2 58. The trial court agreed with the State and denied Lar's motion to have juror 32 removed from the case. RP2 59-60.

Lar argues at length that a trial court's improper denial of peremptory challenges is reversible error, citing to *Bird*⁴. Brief of Appellant 29-33. In *Bird*, during voir dire the defendant accepted the jury panel up to that point, but still had one peremptory challenge left. The State exercised another peremptory challenge,

⁴ *State v. Bird*, 136 Wn. App. 127, 148 P.3d 1058 (2006).

moving the panel down and Bird wanted to use his last peremptory to strike the next juror. The trial court in *Bird* erroneously counted the acceptance of the panel as a peremptory, thereby denying Bird one of his peremptory challenges. The court held that the erroneous denial of the peremptory challenge cannot be deemed harmless when the juror who would have been removed actually deliberates. *State v. Bird*, 136 Wn. App. 127, 133, 148 P.3d 1058 (2006).

The facts in *Bird* are distinct from the facts of Lar's case because the jury had already been impanelled in Lar's case when his counsel asked for Juror 32 to be removed. Lar's trial counsel did argue that he still had peremptory challenges left when he accepted the panel, but by this time the jury had been picked, impaneled and testimony had begun. RP2 59-60.

Lar's case is analogous to *Rempel*. In *Rempel* a juror did not indicate during voir dire that she was acquainted with the complaining witness. During the trial the State called the complaining witness to testify and when she began to testify the juror announced that she was acquainted with the witness. The juror was questioned and she stated that she had no opinion in regards to the witness's credibility or honesty and she could

objectively evaluate the testimony of the witness. The trial court in *Rempel* determined the juror was fair and impartial and denied defense counsel's motion for a mistrial. Rempel's trial counsel argued that he still had a peremptory challenge left and he still had a right to exercise that challenge. In *Rempel* the court held, "[i]t is the trial court that is best able to determine if the juror can set aside any preconceived opinion . . . interpret and evaluate the juror's answers to determine whether the juror will be fair and impartial." *State v. Rempel*, 53 Wn. App. at 801-02. The court further held that the defendant did not have the right to use the peremptory challenge and Rempel was not denied the right to a fair and impartial jury. *Id.* at 804.

Similar to *Rempel*, Lar argues that because he still had peremptory challenges when the jury was accepted and impanelled and therefore his right to a fair and impartial jury has been violated. The trial court found that the juror was not prejudiced and could be fair and impartial. The inquiry of the juror in *Rempel* was similar to the inquiry of Juror 32. Therefore, the trial court did not abuse its discretion and Lar was not denied his constitutional right to a jury trial by a fair and impartial tribunal. Lar is not entitled to a new trial.

//

D. THE TRIAL COURT DID NOT ERROR WHEN IT SENTENCED LAR TO LIFE IN PRISON UNDER THE PERSISTENT OFFENDER ACT.

A persistent offender shall be sentenced to life in prison without the possibility of parole. RCW 9.94A.570. A person is a persistent offender when:

- (a)(i) Has been convicted in this state of any felony considered a most serious offense; and
- (ii) Has, before the commission of the offense under (a) of this subsection, been convicted as an offender on at least two separate occasions, whether in this state or elsewhere, of felonies that under the laws of this state would be considered most serious offenses and would be included in the offender score under RCW 9.94A.525; provided that of the two or more previous convictions, at least one conviction must have occurred before the commission of any of the other most serious offenses for which the offender was previously convicted; or

RCW 9.94A.030(31)(a). A most serious offense includes “[a]ny felony defined under any law as a class A felony or criminal solicitation of or criminal conspiracy to commit a class A felony.”

RCW 9.94A.030(21)(a). Lar was convicted of Burglary in the First Degree, Kidnapping in the First Degree and Attempted Robbery in the First Degree, all most serious offenses. RCW 9A.52.020; RCW 9A.40.020; RCW 9A.56.200; RCW 9A.28.020(2); RCW

9.94A.030(21)(a). The State alleged that Lar, if convicted on any of the pending charges (which he was convicted on all three), was a

persistent offender and filed notice pursuant to the persistent offender accountability act. CP 49. After the jury returned verdicts of guilty on all counts, with the enhancements, a sentencing hearing was held on May 26 through May 27, 2010. SRP 1; CP 175-180.

In a sentencing hearing, “[a] criminal history summary relating to the defendant from the prosecuting authority . . . shall be prima facie evidence of the existence and validity of the convictions listed therein.” RCW 9.94A.500. The State must prove a defendant’s prior criminal convictions by a preponderance of the evidence. RCW 9.94A.500(1); *State v. Kipling*, 166 Wn.2d 93, 101, 206 P.3d 322 (2009). The trial court’s interpretation of the persistent offender accountability act is reviewed de novo. *Id.* at 98. Illegal or erroneous sentences may be challenged for the first time on appeal. *State v. Ross*, 152 Wn.2d 220, 229, 95 P.3d 1225 (2004)(citations omitted). The remedy for an erroneous sentence is remand for resentencing. *Id.*

Lar argues that the State is required to present substantial evidence to prove Lar has the prior convictions claimed by the State. Brief of Appellant 35. Lar argues the State did not prove that the Michael Anthony Lar who was listed in the two federal

judgment and sentences from the 1985 case and the 1996 case is the same Michael Anthony Lar who is the defendant in the present case. Brief of Appellant 35. Lar bases his substantial evidence analysis regarding the standard for proving identity on *State v. Hunter*⁵. Lar's reliance on *Hunter* is misplaced, as the court in *Hunter* is addressing the requirements to prove identity of a person listed on a judgment and sentence when that conviction is an element of the current crime charged. *State v. Hunter*, 29 Wn. App. 218, 221, 627 P.2d 1339 (1981). The facts and legal analysis in *Hunter* are distinct from the facts in Lar's case. In *Hunter*, the defendant was charged with attempted escape in the first degree, therefore the State had to prove Hunter was in jail on a felony conviction as an element of the crime of attempted first degree escape. The legal analysis in *Hunter* is not useful in Lar's case because the State did not need to prove Lar's prior federal convictions as substantive proof of an essential element of any of the crimes charged during trial, but in a sentencing hearing, where the burden of proof is a preponderance of the evidence and the evidence rules need not apply. *State v. Kipling*, 166 Wn.2d at 101; ER 1101(c)(3).

⁵ *State v. Hunter*, 29 Wn. App. 218, 627 P.2d 1339 (1981).

In Lar's case the State presented two certified copies of federal judgment and sentences and accompanying complaints and plea agreements. Sent Ex. 1, 2. The 1985 case certified documents list the defendant as Michael Anthony Lar. Sent Ex. 1. The 1996 case certified documents list the defendant as Michael Anthony Lar and the judgment and sentence also lists a birthday and social security number. Sent Ex. 2. The 1985 case Lar was convicted of two counts of armed bank robbery. Sent Ex. 1. The 1996 case Lar was convicted of armed bank robbery and bank robbery. Sent Ex. 2. At the sentencing hearing the State called Lar's federal probation officer, Jennifer Tien. SRP 3. Ms. Tien testified she recognized Lar because she supervised him, starting in October of 2008 after Lar was released from custody. SRP 3-4. Ms. Tien testified she was familiar with Lar's criminal record. SRP 4. Ms. Tien also testified Lar was the man convicted of the offenses listed in the two federal judgment and sentences. SRP 10; Sent Ex. 1, 2.

The evidence submitted by the State is sufficient to show by a preponderance of the evidence that Lar was convicted previously on two separate occasions in United States District Court of three counts of armed bank robbery and one count of bank robbery. The

trial court properly sentenced Lar under the persistent offender accountability act to life in prison on Counts One, Two and Three. CP 211-218. Lar's sentence should be affirmed.

CONCLUSION

For the foregoing reasons, this court should affirm Lar's convictions for burglary in the first degree, kidnapping and attempted robbery in the first degree. Lar's sentence should be affirmed because at the sentencing hearing the State sufficiently proved Lar's prior convictions by a preponderance of the evidence.

RESPECTFULLY submitted this 24th day of March, 2011.

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COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON,)
Respondent,)
vs.)
MICHAEL A. LAR,)
Appellant.)
_____)

NO. 40801-5-II

DECLARATION OF
MAILING

BY
STATE OF WASHINGTON
DEPUTY

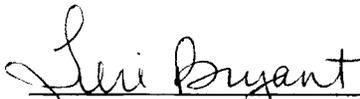
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Ms. Teri Bryant, paralegal for Sara I. Beigh, Deputy

Prosecuting Attorney, declares under penalty of perjury under the laws of the State of Washington that the following is true and correct: On March 25, 2011, the appellant was served with a copy of the **Respondent's Brief** by depositing same in the United States Mail, postage pre-paid, to the attorney for Appellant at the name and address indicated below:

John A. Hays
Attorney at Law
1402 Broadway, Suite 103
Longview, WA 98632

DATED this 25th day of 2011, at Chehalis, Washington.



Teri Bryant, Paralegal
Lewis County Prosecuting Attorney Office