

COURT OF APPEALS
DIVISION II

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STATE OF WASHINGTON
By WASHINGTON
DEPUTY

IN THE COURT OF APPEALS OF THE STATE OF
DIVISION II

NO. 40837-6-II

STATE OF WASHINGTON,

Respondent.

vs.

FREYA MARCONNETTE,

Appellant.

On Appeal from the Superior Court of Lewis County

STATE'S RESPONSE BRIEF

JONATHAN L. MEYER
PROSECUTING ATTORNEY
Law and Justice Center
345 W. Main St. 2nd Floor
Chehalis WA 98532
360-740-1240

By: Eric Eisenberg

Eric Eisenberg, WSBA No. 42315
Deputy Prosecuting Attorney

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COUNTERSTATEMENT OF THE ISSUES

1. If a defendant claims that she accidentally hit an officer when she flailed out of fear she would fall down the stairs, but admits that she would not have been in danger of falling had she not resisted arrest, is she entitled to a lawful force instruction?
2. If the State and the defense proposed a lawful force instruction, but the trial court correctly rejected the instruction as unsupported by the evidence, was the defense attorney's performance constitutionally ineffective?
3. Did the prosecutor commit misconduct by summarizing the division of roles at trial between the jury who decides the facts, the judge who decides the law, and the attorneys who argue?
4. In overruling an objection to the prosecutor's division-of-roles argument, did the court improperly comment on the evidence?

INTRODUCTION

Freya Marconnette appeals from her conviction of assaulting a law enforcement officer. Officers responded to Marconnette's report of a domestic dispute between a man and a woman. They attempted to speak to the woman involved in the dispute with Marconnette acting as a go-between. Eventually, the officers told Marconnette they needed to talk to the woman directly, and if she continued to interject herself she would be charged with obstructing. When Marconnette then tried to shut the door on the officers, there was a struggle in which the officers handcuffed her. Marconnette flailed her arms and

legs during the struggle and bit one of the officers in the leg. She was tried for assaulting a law enforcement officer. Her defense was that she flailed because she was afraid of falling down the stairs near the scene of the struggle, and had not intended to hit the officers with her limbs or her teeth. The jury convicted her of assault. She now appeals, arguing that the jury had to be instructed on lawful force and that the judge and prosecutor committed misconduct.

STATEMENT OF THE CASE

On February 13, 2010, Chehalis Police Officer Thompson responded to a report of a domestic dispute between a man and woman at 231 SW 11th Street Apt. 9 in Chehalis, in Lewis County, Washington. Verbatim Report of Proceedings (VRP) (May 12, 2010) at 22. He noticed a man in pajama pants standing near the apartment building. The man ran away when the officer arrived; he was later identified as the male half of the dispute. *Id.* at 23-24.

Officer Thompson walked up the stairs and knocked on apartment 9's door while other officers contacted the man who ran. A young woman answered and identified herself as the 911 caller, Freya Marconnette. *Id.* at 24, 31. Marconnette opened the door just wide enough for her to shimmy out, then closed it behind her. She

said that the other party to the dispute, Connie Durga, was inside. *Id.* at 25.

Officer Thompson told Marconnette that he needed to speak with Durga to find out what was going on. Marconnette squeezed back inside the apartment in the same way she had come in. Officer Thompson was suspicious of this unusual behavior. *Id.* at 25-26. Marconnette reappeared and said that Durga did not want to talk to the police. The two repeated this interaction a few times as Officer Thompson tried to convince Durga, through Marconnette, to come to the door to speak with him. *Id.* at 26.

Officer Thompson then learned that another officer had spoken to the male half of the dispute, who had visible signs of injury and claimed that Durga assaulted him. *Id.* at 26-27. Officers Thompson and Henderson knocked on Durga's door a second time. Once again, Marconnette answered. The officers pleaded with her to allow them to speak to Durga. *Id.* at 27. They wished to speak with Durga because, in a domestic dispute, one can be both a suspect and a victim; they were concerned Durga was trying to cover up her injuries. *Id.* at 89. For all the officers knew, Durga was dead. *Id.* at 90.

Marconnette continued to say that Durga did not want to come

to the door, eventually becoming defiant. *Id.* at 27-28. Marconnette told the officers that they “couldn’t come in the fucking house without a fucking warrant.” *Id.* at 28, 116. The officers replied that they were coming in and that if she continued to interfere she would be obstructing their investigation. *Id.* at 28, 45.

Marconnette turned quickly and darted into the apartment, attempting to close the door on the officers. *Id.* at 28. Officer Henderson blocked the door with his foot, reached in, and grabbed her arm. *Id.* at 28-29. He informed her that she was under arrest for obstructing. *Id.* Marconnette actively resisted, flailing her arms, kicking, and cursing at the officers. She was close enough to hit the officers and they believed she was aiming at them. *Id.* at 29, 56. The officers struggled with Marconnette, eventually bringing her to the ground and handcuffing her. *Id.* at 29-30. During the fight, Marconnette bit Officer Henderson on the back of the leg, leaving teeth marks but causing no injury. *Id.* at 71. A photo of the bite mark was admitted into evidence. *Id.* at 73.

The struggle occurred on the landing just outside of Durga’s apartment door, which was on the second floor. *Id.* at 83-84. At the end of the struggle, Officer Thompson stood one step down the stairs

from the landing while Marconnette was handcuffed. *Id.* at 59. Both officers admitted that part of Marconnette's body protruded partially off the landing at some point, but not to the extent that Marconnette was in danger of falling down the stairs. *Id.* at 56-57, 59-60, 74, 83. Marconnette maintained that she was hanging over the stairs from the waist up. *Id.* at 108.

Marconnette was charged with assault in the third degree for assaulting a law enforcement officer. At trial, Marconnette did not dispute that she hit the officers and bit one of them. *Id.* at 113-14. But, she claimed that she "had no intention of biting the police officer or in any other way assaulting an officer." *Id.* at 113. She said that she began flailing because she was afraid she would fall down the stairs. *Id.* at 121. She was swinging her arms, but did not intend to hit the officers; she was trying to "get [her]self back up the stairs" after she was dangling off. *Id.* at 122. She was not frightened that the officers would throw her down the stairs, but that she would fall accidentally by their actions. *Id.* at 122-23. Defense counsel later argued that assault requires intent, and Marconnette did not intend to assault the police officers. It was "the last thing on her mind," he said. *Id.* at 137-38.

The State and defense each proposed WPIC 17.02.01, regarding the lawful use of force in self-defense. *Id.* at 125. The State proposed the instruction only if the court determined it was appropriate, however. *Id.* The court rejected the instruction but did not elaborate, and the defense excepted but did not propose why the court's ruling was erroneous. *Id.* However, the jury was instructed on the definition of assault under WPIC 35.50, which included unlawful force as one aspect of assault. Jury Instruction 5.¹ The jury was also instructed on a number of preliminary matters under WPIC 1.02. Jury Instruction 1.

The State began its closing argument with a description of the jury's role. The prosecutor asked the jury to decide the facts and apply them to the law provided by the judge. *Id.* at 126. The prosecutor continued:

We have certain systems in this country for dispensing justice and different people play different roles. The judge rules on the law, he makes rulings whether officers do the right thing, whether---

MR. BLAIR [defense]: Object to that, your Honor.

THE COURT: Bases for your objection?

MR. BLAIR: He's not arguing the evidence.

¹ The State has submitted a supplement designation of clerks papers to make the jury instructions part of the record. For ease of reference, they are cited by instruction number.

THE COURT: Overruled.

MR. SCOTT [prosecution]: Judge makes determination of what the law is on a particular crime, tells you what has to be proven, and so forth. The attorneys, we're advocates, that's why you specifically have an instruction that says what the attorneys say is not evidence What we're saying in closing is not evidence, just simply argument.

Id. at 126-27. The prosecutor then argued the facts of the case, asking the jury to find that Marconnette intentionally, offensively bit Officer Henderson in the course of his official duties. *Id.* at 127-32. In concluding, he asked the jury to look at the evidence, to avoid letting sympathy or irrelevant matters affect its vote, and to let the judge decide the appropriate punishment. *Id.* at 131-32. The jury returned a verdict of guilty, from which Marconnette appeals.

ARGUMENT

I. The defendant was not entitled to a lawful force instruction because she claimed that she struck the officers by accident, because she created the danger of physical harm, and because there was no evidence of excessive force.

A. Background and Standard of Review

The defense is entitled to a jury instruction on its theory of the case if the instruction correctly states the law and is supported by the evidence. *State v. Harvill*, 169 Wn.2d 254, 259, 234 P.3d 1166

(2010). Because unlawful force is an element of assault, if the defense properly raises lawful force as a defense the State must disprove it beyond a reasonable doubt. *State v. Kyllö*, 166 Wn.2d 856, 862, 215 P.3d 177 (2009). The instructions must make the State's burden clear to the jury. *State v. Redwine*, 72 Wn. App. 625, 630-31, 865 P.2d 552 (1994). Failure to correctly inform the jury is reversible error unless it is harmless beyond a reasonable doubt. *State v. Berube*, 150 Wn.2d 498, 505, 79 P.3d 1144 (2003).

However, all of these protections presuppose that the defendant is entitled to an instruction on lawful force. If, taking the facts in the light most favorable to the defendant, the lawful force instruction is not supported in the evidence, it is not error to refuse the instruction. *State v. Walker*, 136 Wn.2d 767, 772, 966 P.2d 883 (1998); *State v. Griffith*, 91 Wn.2d 572, 575-76, 589 P.2d 799 (1979).

In other words, the State has the burden to disprove self-defense only when it is properly raised on the facts of the case. A denial of an instruction for lack of factual support is reviewed for abuse of discretion. *State v. Buzzell*, 148 Wn. App. 592, 602, 200 P.3d 287 (Div. 1 2009). The court may affirm the ruling below on any ground supported in the record. *State v. Costich*, 152 Wn.2d 463, 477, 98

P.3d 795 (2004).

The requirements of a lawful force defense in this context are described in WPIC 17.02.01:

A person may use force to resist an arrest only if the person being arrested is in actual and imminent danger of serious injury from an officer's use of excessive force. The person may employ such force and means as a reasonably prudent person would use under the same or similar circumstances.

The defendant here was not entitled to this instruction for three reasons. First, she produced no evidence that she was using force to resist an arrest—Marconnette said she was flailing to prevent herself from falling down the stairs and had no intention of using force against the officers themselves. Second, there was no evidence that she was in danger of injury *from* an officer's use of force—even Marconnette agreed that the officers were not planning on throwing her downstairs, and the only danger to her came from her own flailing about. Third, there was no evidence that any danger to her came from an officer's use of *excessive* force—the officers merely tried to detain and handcuff Marconnette, and only had to struggle with her because she wouldn't let them do it.

- B. The defendant was not entitled to a lawful force instruction because she did not claim she was trying to resist arrest.

A self-defense claim asserts that the defendant intentionally used force against another to prevent injury to him- or herself, and that the circumstances were such that the use of force was lawful. *Cf., e.g.*, RCW 9A.16.020 (authorizing force when “used by a party about to be injured . . . in preventing or attempting to prevent an offense against his or her person . . . in case the force is not more than is necessary”). Applied in this context, one is justified in resisting arrest to avoid a danger of harm from the officer, but this entails that one intentionally use force against the officer for the purpose of avoiding harm to oneself. *Cf.* RCW 9A.76.040 (defining “resisting arrest” as intentionally preventing an officer from lawfully arresting). Self-defense is inconsistent with Marconnette’s claim that, fearing that she would fall down the stairs, she flailed and accidentally hit the officers. This is because she did not claim that she intentionally hit them, nor did she intend to prevent her arrest. Thus, in Marconnette’s version of events, she did not resist the officers’ arrest and is not entitled to a lawful force instruction.

Of course, a claim of accident is not necessarily inconsistent with self-defense. *See, e.g., State v. Werner*, 170 Wn.2d 333, 337, 241 P.3d 410 (2010). In *Werner*, the defendant claimed that he drew

his gun because he was being threatened by the victim's dogs. *Id.* at 336. The victim then called off the dogs but took steps toward the defendant. The defendant was still scared; he claimed that, as he was placing the gun on the ground to call 911, it accidentally fired. *Id.* The Court ruled that Werner was entitled to both lawful force and accident instructions: lawful force for drawing the gun and accident for firing it. *Id.* at 337.

Unlike *Werner*, however, Marconnette did not claim that she intentionally used force at any point. Her defense was purely accident. Defense counsel argued that she did not intend to hit the officers and that resisting the arrest was the last thing on her mind. VRP at 137-38. He did not argue, as an alternative to the accident theory, that Marconnette would have been justified if she had intentionally resisted arrest. There is simply no basis for a self-defense instruction in this case, as there was in *Werner*.

- C. The defendant was not entitled to a lawful force instruction because the defendant, and not the officers, created the possibility of physical harm.

Assuming for the sake of argument that Marconnette would satisfy the "resist" requirement, the defense of lawful force requires that the person resist arrest to avert a "danger of serious injury *from*

an officer's use of excessive force." WPIC 17.02.01 (emphasis added). This entails that there be a causal connection between the danger of injury and the officer's use of force. See "From," MERRIAM-WEBSTER DICTIONARY, *available online at* <http://www.m-w.com> (defining "from" as indicating something's source or cause).

Marconnette was in front of the door to Durga's apartment when officers told her that they were coming in and that if she interfered she would be obstructing their investigation. VRP at 28, 45. She admitted that, had she stepped aside, she would not have been arrested; the officers could have walked in. *Id.* at 116. She admitted that she was inside the apartment when the officers told her she was under arrest for obstructing, *id.* at 104-05, and that she didn't simply turn around and say, "ok, handcuff me," *id.* at 118. She admitted that had she done so, she would not have been in any physical danger. *Id.* at 118-19. Finally, she admitted that she did not think the officers were coming in with the intention of throwing her down the stairs. *Id.*

As a consequence of Marconnette's testimony, there was no room to conclude that she resisted arrest because of the officer's use of force. She began to resist when there was no threat of physical

injury—she was inside an apartment, far from the stairs. The only danger at that point was of loss of freedom, which cannot form the basis for a lawful force defense. See *State v. Valentine*, 132 Wn.2d 1, 21, 935 P.2d 1294 (1997) (“[A] person may not use force against the arresting officers if he or she is faced only with a loss of freedom.”). Any danger to her came from the fact that, after she began resisting, the officers had to struggle to handcuff her. Had she not resisted, the officers would have proceeded calmly, as Marconnette admitted. It was Marconnette’s resisting and the ensuing struggle that *created* the danger Marconnette claimed to be trying to avert. Just as the first aggressor in a fight cannot avail himself of a self-defense instruction, *State v. Wingate*, 155 Wn.2d 817, 822, 122 P.3d 908 (2005), Marconnette cannot claim that she used lawful force to prevent a danger that she created by resisting arrest. The danger to Marconnette was not “from” an officer’s use of force and she was not entitled to a lawful force instruction.

D. The defendant was not entitled to a lawful force instruction because there was no evidence of excessive force.

Finally, one may only use lawful force to resist danger from an officer’s exercise of excessive force. In *Valentine*, the court held that

the only lawful basis to resist arrest is to avert danger of physical injury—mere loss of freedom is not enough. 132 Wn.2d at 21. Marconnette admitted that, had she not resisted, the officers would have arrested her without incident and she would not have been in physical danger. VRP at 118-19. She admitted that she did not believe they intended to throw her down the stairs. *Id.* In fact, the evidence suggested that the officers tried to convince Marconnette to step aside peacefully. When she refused, they attempted to handcuff her, and struggled with her only to get her on the ground to handcuff her. *Id.* at 29-30. The officers did not draw their weapons, did not deploy their tasers, and did not punch, kick or hit the defendant, as she did to them. See VRP at 54, 91. In short, the officers did not use any more force than necessary to arrest Marconnette. See RCW 9A.16.020(1) (authorizing police officers' use of necessary force). Because she did not produce any evidence of excessive force, Marconnette was not entitled to a lawful force instruction.

E. This court's review is for abuse of discretion.

The trial court in this case was in the best position to gauge the extent of the evidence based on the testimony, and to determine whether the defense had in fact raised facts sufficient to claim lawful

force. *See Buzzell*, 148 Wn. App. at 602 (using abuse-of-discretion review for the decision not to give an instruction). Taking the facts in the light most favorable to the defendant, the trial judge was well within his discretion to conclude that Marconnette's claim was really one of accident, not self-defense. Even if the refusal to give the instruction was erroneous, Marconnette's own testimony contradicted the elements of the defense to such an extent that the lack of instruction was harmless beyond a reasonable doubt.² The trial court's rejection of the lawful force instruction should be affirmed.

II. Trial counsel was not constitutionally ineffective.

On appeal, Marconnette claims that trial counsel was constitutionally ineffective for failing to propose a lawful force instruction. But, the State and the defense each proposed WPIC 17.02.01, which is the appropriate instruction. VRP at 125. The Court rejected the instruction as unsupported by the evidence. *See id.* This fact is preserved in the record for appeal. *Id.* Thus, counsel's performance was not deficient. Furthermore, no prejudice

² The error would also be harmless because the jury was instructed that an assault requires unlawful force. *See* Jury Instruction 5 (defining assault as an intentional harmful or offensive touching, with unlawful force); *see also* VRP at 129 (arguing the point).

resulted because the defendant was not entitled to the instruction, and Marconnette's testimony was such that no jury could have found lawful force. The ineffective assistance claim fails. *See generally Strickland v. Washington*, 466 U.S. 668, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984).

To the extent that trial counsel did not argue more vehemently for the lawful force instruction, he employed sound trial strategy. Marconnette's testimony made clear that her real defense was accident, not self-defense. Arguing both theories of the case would confuse the jury because the accident claim ("I didn't mean to hit them") was inconsistent with the self-defense claim ("I hit them on purpose because I was afraid"). Alternative arguments would also undermine Marconnette's credibility: the jury would see her as trying to have her cake and eat it, too. Choosing to concentrate solely on the accident defense was not ineffective assistance. *See State v. McFarland*, 127 Wn.2d 322, 336, 899 P.2d 1251 (1995) (noting that strategic decisions are not ineffective assistance).

- III. The prosecutor did not commit misconduct by summarizing the division of labor between the jury, judge, and advocates.

A claim of prosecutorial misconduct is reviewed for abuse of discretion. *State v. Ish*, 170 Wn.2d 189, 195-96, 241 P.3d 389 (2010). The burden is on the appellant to show improper conduct and prejudice. *Id.* During closing argument, it is misconduct for a prosecutor to rely on facts not in evidence or to argue points of law not presented to the jury in the court's instructions. *State v. Jones*, 144 Wn. App. 284, 293, 183 P.3d 307 (Div. 2 2008); *State v. Davenport*, 100 Wn.2d 757, 760, 675 P.2d 1213 (1984).

Here, the first jury instruction was WPIC 1.02, regarding several general, preliminary matters. See Jury Instruction 1. It directed the jurors to decide the facts based on the evidence presented and to accept the law as decided by the judge and given to them in the instructions. *Id.* It defined one of the judge's duties as ruling on the admissibility of evidence. *Id.* It said that the attorneys' arguments were neither the law, which was given in the judge's instructions, nor evidence, which was the testimony and exhibits. *Id.* It reminded the jurors not to consider the punishment that might follow from conviction except insofar as it made them careful. *Id.* Finally, it exhorted the jurors to act on rational appraisal of the facts and not on sympathy or prejudice. *Id.* The jury is presumed to have followed this

instruction. *State v. Yates*, 161 Wn.2d 714, 763, 168 P.3d 359 (2007).

The prosecutor wove WPIC 1.02 into his closing argument to avoid jury nullification. On the facts, jury nullification was a risk: Marconnette, an 18 year old woman, called 911 and initially cooperated with law enforcement, but eventually ended up getting tackled and injured by officers much larger than she. A jury might have acquitted her because they concluded that she did not deserve to be punished, despite being factually guilty.

To avoid this result, the prosecutor started and finished his closing with a description of the jury's role, as opposed to that of the judge or counsel. He asked the jury to decide the facts and to apply the law from the judge's instructions to those facts. VRP at 126. He then described how the judge rules on the law, determines the elements of the crime, etc. *Id.* He continued with a description of an advocate's role, and asked the jury to remember that counsels' argument was not evidence. *Id.* at 126-27. Then, he argued the facts for the bulk of his time. *Id.* at 127-32. At the end of closing, he again asked the jury to decide the case on the evidence, to avoid letting sympathy or irrelevant matters affect its vote, and to leave the issue of

punishment to the judge. *Id.* at 131-32. All of these sentiments are found in WPIC 1.02, which is an accurate statement of the law and was read to the jury in this case.

It is in this context that the defense attorney objected to the prosecutor's statement that "The judge rules on the law, he makes rulings whether officers do the right thing" VRP at 126. The prosecutor was using this phrase as an example of a legal matter within the judge's purview, just like deciding the "law . . . on a particular crime, . . . what has to be proven, and so forth." *Id.* The jury had already heard that the judge would rule on the admissibility of evidence, another legal matter. Jury Instruction 1. It was not misconduct for the prosecutor to argue that the jury should do its duty and leave the judge and the attorneys to their own roles.

Even if this argument were improper, the jury would not have found it significant. The appellant argues that, from the following exchange, the jury inferred that the judge had ruled that Marconnette's arrest was lawful:

We have certain systems in this country for dispensing justice and different people play different roles. The judge rules on the law, he makes rulings whether officers do the right thing, whether---
MR. BLAIR [defense]: Object to that, your Honor.

THE COURT: Bases for your objection?

MR. BLAIR: He's not arguing the evidence.

THE COURT: Overruled.

MR. SCOTT [prosecution]: Judge makes determination of what the law is on a particular crime, tells you what has to be proven, and so forth. The attorneys, we're advocates, that's why you specifically have an instruction that says what the attorneys say is not evidence What we're saying in closing is not evidence, just simply argument.

Id. at 126-27. Not even the trial judge understood the basis for the defense objection to the prosecutor's argument. *See id.* There is no reason to suspect that the jury would assume anything based on the one-word overruling. Defense counsel's objection, "he's not arguing the evidence," did not tip the jury off. *Id.* Also, the jury was instructed not to attach significance to objections, and they presumably follow instructions. Jury Instruction 1; *Yates*, 161 Wn.2d at 763. If the jurors disregarded this instruction, the most they might guess is that the prosecutor was allowed to summarize WPIC 1.02, which they had just heard. Finally, the issue did not come up again during closing. Thus, even if the prosecutor erred, there was no prejudice to the defendant. It was not an abuse of discretion for the trial judge to overrule the objection.

IV. The trial judge did not improperly comment on the evidence by overruling an objection to the prosecutor's division-of-roles argument.

The judge did not improperly comment on the evidence by asking the basis for the objection and then overruling it in one word. It is difficult to see how the judge could have made any less of a comment on the matter! The ruling was correct, as argued above.

In any event, even if the judge imparted information to the jury about the evidence through this brief exchange, WPIC 1.02 specifically told the jurors that the judge may not comment on the evidence, that he would not do so intentionally, and that they should disregard anything he did that appeared to express his opinion about the evidence. Jury Instruction 1. The jury is presumed to have followed this instruction. *Yates*, 161 Wn.2d at 763. The defense cannot show that the judge made any comment on the evidence or that it in any way affected the outcome of the trial. The trial court should be affirmed.

CONCLUSION

Freya Marconnette intentionally hit, kicked, and bit a law enforcement officer in the course of his official duties. She claimed

that she had done so by accident when she flailed to avoid falling downstairs, but her own testimony showed that she had been inside, far from the stairs, when she first began flailing. She admitted that had she not resisted arrest, she would have been taken into custody peacefully and no harm would have come to her. The trial court did not abuse its discretion in rejecting her proposed jury instruction on lawful force. Nor did the trial court abuse its discretion or improperly comment on the evidence in overruling an objection to the prosecutor's closing argument. The argument was proper because it merely paraphrased the first jury instruction, which outlined the division of roles between the jury, judge, and advocates. For these reasons, the court should affirm Marconnette's conviction.

RESPECTFULLY SUBMITTED this 18 day of March, 2011.

JONATHAN L. MEYER
Lewis County Prosecuting Attorney

BY: 
ERIC EISENBERG, WSBA 42315
Deputy Prosecuting Attorney

COURT OF APPEALS
DIVISION II

COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON

BY: Teri Bryant
DEPUTY

STATE OF WASHINGTON,)
Respondent,)
vs.)
FREYA MARCONNETTE,)
Appellant.)
_____)

NO. 40837-0-2-11

DECLARATION OF
MAILING

Ms. Teri Bryant, paralegal for Eric Eisenberg, 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 18, 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:

Jodi R. Backlund & Manek R. Mistry
Backlund & Mistry
PO Box 6490
Olympia, WA 98507

DATED this 18th day of 2011, at Chehalis, Washington.

Teri Bryant
Teri Bryant, Paralegal
Lewis County Prosecuting Attorney Office