

NO. 41596-8-II

**COURT OF APPEALS, DIVISION II
STATE OF WASHINGTON**

STATE OF WASHINGTON, RESPONDENT

v.

KENNETH A. GRAHAM, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Edmund Murphy

No. 10-1-01803-6

Respondent's Brief

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A. ISSUES PERTAINING TO APPELLANT'S ASSIGNMENTS OF ERROR.

1. Has defendant failed to meet the substantial burden of showing ineffective assistance of counsel where defendant was found guilty of a lesser included offense, and made or withheld objections according to trial strategy?

B. STATEMENT OF THE CASE.

1. Procedure

On April 27, 2010, the State filed an information charging defendant, Kenneth Graham, with one count of assault in the second degree, and one count of felony harassment against Jason Sullenger, as well as one count of felony harassment against Tyson Bower. CP 1-2. On September 30, 2010, the State amended the information adding two counts of violation of a no contact order, one count of intimidating a witness, and one count of tampering with a witness, all committed against Mr. Sullenger. CP 6-9. The State filed a second amended information on November 15, 2010, correcting the charging dates of the offenses. CP 13-16. The informations also charged an aggravating factor of domestic violence on all counts in which Mr. Sullenger was the victim. *Id.*

A jury trial began before the Honorable Edmund Murphy on November 15, 2010. RP 17. At the conclusion of the case, the jury was instructed, at defense counsel's request, as to the lesser included offense of assault in the fourth degree. CP 68-72, RP 270. On December 17, 2010, the jury found defendant guilty of the lesser included crime of assault in the fourth degree, and guilty as charged on all other counts. CP 111-117. The jury also found that the aggravating circumstances applied to each crime as charged. CP 118-123.

Defendant's sentencing hearing was held on December 17, 2010. RP 368. Defendant stipulated that his offender score was 6. CP 124-127. The court sentenced defendant to 54 months for intimidating a witness, the middle of the standard range. CP 128-141; RP 375. The court also imposed a sentence of 29 months each on the two counts of felony harassment and the count of tampering with a witness. CP 128-141; RP 375-76. These sentences are the high end of the standard range. CP 124-127, 128-141. On each of the remaining charges, assault in the fourth degree, and two counts of violation of a no contact order, the court imposed a 365 day sentence with 365 days suspended. CP 142-146.

2. Facts

On February 13, 2010, Mr. Sullenger and his brother, Mr. Bower, were hanging out in Mr. Sullenger's yard. RP 48. Defendant, Mr. Sullenger's brother-in-law and next-door-neighbor, was talking to Mr.

McGurran, and seemed upset. RP 50. Defendant was yelling and cursing, so Mr. Sullenger went over to see if there was anything he could do to help calm him down. RP 50-51. Defendant was upset because his wife was cheating on him. RP 52. His anger was directed at himself. RP 53. Mr. Sullenger watched as defendant swallowed a bottle of pills. RP 54. Mr. Sullenger argued with defendant, trying to stop him. RP 54. Defendant then went to the shop, and Mr. Sullenger tried to stop him, knowing defendant kept a gun there. RP 54-55, 78.

After exchanging words, defendant attacked Mr. Sullenger, grabbing him by the neck, cutting off his air supply. RP 55-57. Mr. Sullenger felt dizzy and his face was turning blue. RP 55, 195. Tyson Bower, Mr. Sullenger's brother, jumped on defendant's back to force him to let go of Mr. Sullenger. RP 56, 195. Defendant let go of Mr. Sullenger, who was able to catch his breath, but felt dizzy. RP 56. Defendant focused his attention on Mr. Bower, who backed away from defendant and told his brother to get his keys so they could leave. RP 59, 195, 200. Mr. Bower and Mr. Sullenger got into Mr. Bower's car and went to the Thunderbird, a bar near the house. RP 61.

Mr. Sullenger's wife, Edrea Sullenger, called 911 to report the incident after she received a hysterical phone call from her husband. RP 134; Exhibit 5. Ms. Sullenger provided the 911 operator with her husband's phone number, and the 911 operator called Mr. Sullenger. RP 118; Exhibit 5. While crying on the phone, Mr. Sullenger gave the 911

operator the location he was going to. RP 118-119; Exhibit 5. The 911 operator then asked Mr. Sullenger who assaulted him, and Mr. Sullenger replied, "Fuck man, I don't even want to tell on him. He's going to kill me." Exhibit 5. He later identified his attacker as "my neighbor, Kenny." *Id.* After further questioning regarding defendant's physical description, Mr. Sullenger explained, "This is going to come back to me. He's going to fucking kill me. He's already pulled a gun out before on me." *Id.* Mr. Sullenger tried to explain to the 911 operator why he didn't want to report the crime, saying, "Last time somebody pulled on him, they ended up dead." *Id.* Mr. Sullenger knew that defendant had a shotgun in his shop, along with a bow and arrow. RP 78.

Officer James Cowen went to the Thunderbird, in response to the 911 call, to make contact with Mr. Sullenger and Mr. Bower. RP 167. He took statements from the two at that time. *Id.* He described Mr. Sullenger as appearing scared, very upset and angry. *Id.* Officer Cowen observed that Mr. Sullenger had been drinking, but that he was coherent, alert and responding appropriately. RP 174. Mr. Sullenger told Officer Cowen that the defendant had been talking about killing himself which caused Mr. Sullenger to try to intervene. RP 169. Defendant had gotten angry about the intervention and strangled Mr. Sullenger. RP 169. Mr. Sullenger informed the officer that he had blacked out from being strangled. RP 169. The two brothers, Mr. Sullenger and Mr. Bower, began to leave the house and as they did defendant threatened to kill both of them and their

children if they called the police. RP 170. Officer Cowen also observed that there were “some very distinctive red marks around [Mr. Sullenger’s] neck,” which appeared to be handprints. RP 171. Mr. Sullenger’s wife testified the marks on her husband’s neck were bruises when she saw them that night. RP 141.

Mr. Bower testified that, after the fight on February 13, 2010, that that defendant was threatening his and his brother’s lives. RP 195-96. Defendant told them, “If you call the cops or tell anybody it will get a lot worse, I’ll hurt you, I’ll kill you.” RP 196, 208. Mr. Bower stated that there was no doubt in his mind that defendant had threatened his life on February 13th, 2010. RP 202-03. Tyson Bower was afraid to testify in the case because he felt his life was in danger because defendant would retaliate for his testimony. RP 198. Mr. Bower came in to testify only after being picked up by police and brought to court on a material witness warrant. RP 198. Mr. Bower also testified that he knew defendant to be in possession of guns, and that he had heard gunshots from defendant’s property prior to the date of the incident. RP 199.

A no contact order was issued on May 11, 2010 prohibiting defendant from contacting Mr. Sullenger. RP 125; Exhibit 7. Despite this no contact order, defendant came to Mr. Sullenger’s house and spoke to him on at least two separate occasions. RP 69, 104-06. On June 14, 2010, defendant came into Mr. Sullenger’s house and “got in [Mr. Sullenger’s] face” and told him, “You better watch your fucking mouth.” RP 70-71.

Defendant also called Mr. Sullenger a snitch and warned him that he had to go to court, but had better not “pull out [his] snitch blade.” RP 71. Defendant also told Mr. Sullenger to “think about [his] family,” and pointed to Mr. Sullenger’s pregnant wife’s stomach. RP 74. Mr. Sullenger testified that he was scared and nervous that defendant would harm him and his family if he testified. RP 76. Mr. Sullenger felt that this was a threatening situation. RP 76. He was afraid that defendant would harm him or his family if he testified. RP 76.

On the second occasion, four or five days after the first, defendant walked into Mr. Sullenger’s yard where Mr. Sullenger and his wife were at the time. RP 69. Defendant again told Mr. Sullenger to “watch [his] F-ing mouth.” RP 82. Defendant also told Mr. Sullenger that he needed to “keep an eye out behind [him]” because there were already “people lined up to take [him] out.” RP 128. Mr. Sullenger was afraid of defendant at that time as well. RP 82.

Defense called defendant’s friend, Joseph McGurran, who testified that he was present when defendant and Mr. Sullenger were speaking before the attack. RP 218. Defendant dismissed both Mr. Sullenger and Mr. McGurran because he was in a bad mood. RP 219. Mr. McGurran testified that he left the property, but stayed within eyesight of the defendant’s house because he “was worried for Kenny and Jason.” RP 221. He sat in an orchard about 150 feet away from the house. RP 220. He also testified that he witnessed the incident, but that defendant did not

strangle Mr. Sullenger, rather, he placed his hands on Mr. Sullenger's shoulders. RP 223-24. The two were engaged in a heated argument, but it wasn't violent. RP 234-36. Mr. McGurran watched as Mr. Bower jumped on defendant's back from "out of nowhere," and defendant "shrugged him off." RP 238. Mr. McGurran then heard defendant ask to be left alone, and saw him walk away from the brothers. RP 240-41. Mr. Sullenger and Mr. Bower then decided to "run to the T-bird" for a drink, and left. RP 241.

Defendant's mother, Linda Thompson, and his sister, Susan Busching, also testified in his defense. RP 258, 264. His mother testified that defendant was in Omak for about a week around July 23, 2010. RP 261-63. She also testified that the defendant was living with her in Tacoma during July of 2010. RP 263. Defendant's sister testified that defendant was living exclusively with her in Bellevue during July of 2010. RP 265. She also testified that she had taken him with her to Eastern Washington on July 10, 2010, and he stayed until July 24, 2010. RP 265-66.

Defendant's father, Sylvan Graham, testified that in the evening on the date of the attack he had rushed defendant to the hospital after a suicide attempt. RP 251. Defendant took a bottle of pills prescribed to his

wife. RP 254. After defendant was admitted to the hospital, he was placed on a respirator. RP 257. Mr. Graham also testified that defendant was a hunter. RP 256.

Defendant did not testify.

C. ARGUMENT.

1. DEFENDANT RECEIVED EFFECTIVE ASSISTANCE OF COUNSEL.

The prosecution's case must "survive the crucible of meaningful adversarial testing" in order for the right to effective assistance of counsel to have been fulfilled. *United States v. Cronin*, 466 U.S. 648, 656, 104 S. Ct. 2045, 80 L.Ed.2d 657 (1984). When a true adversarial proceeding has been conducted, the protection envisioned by the Sixth Amendment has occurred, even if defense counsel has made demonstrable errors of tactics or judgment. *Id.* "The essence of an ineffective-assistance claim is that counsel's unprofessional errors so upset the adversarial balance between defense and prosecution that the trial was rendered unfair and the verdict rendered suspect." *Kimmelman v. Morrison*, 477 U.S. 365, 374, 106 S. Ct. 2574, 2582, 91 L.Ed.2d 305 (1986).

A defendant who raises a claim of ineffective assistance of counsel must demonstrate that: (1) his or her attorney's performance was deficient,

and (2) the deficiency was prejudicial. *Strickland v. Washington*, 466 U.S. 668, 104 S. Ct. 2052, 80 L.Ed.2d 674 (1984); *State v. Hendrickson*, 129 Wn.2d 61, 77-78, 917 P.2d 563 (1996). Under the first prong, matters that go to trial strategy or tactics do not show deficient performance. *State v. Garrett*, 124 Wn.2d 504, 520, 881 P.2d 185 (1994). Under the second prong, defendant must show that a reasonable probability exists that the result of the trial would have been different, but for counsel's errors. *State v. Thomas*, 109 Wn.2d 222, 226, 743 P.2d 816 (1987).

The standard of review for effective assistance of counsel is whether the court can conclude, after examining the record as a whole, that defendant received effective representation and a fair trial. *State v. Ciskie*, 110 Wn.2d 263, 284, 751 P.2d 1165 (1988). Judicial scrutiny of an attorney's performance must be "highly deferential in order to eliminate the distorting effects of hindsight." *Strickland*, 466 U.S. at 689. The reviewing court must judge the reasonableness of counsel's actions "on the facts of the particular case, viewed as of the time of counsel's conduct." *Id.* at 690; *State v. Benn*, 120 Wn.2d 631, 633, 845 P.2d 289 (1993).

A presumption of counsel's competence can be overcome by showing counsel failed to conduct appropriate investigations, adequately prepare for trial, or subpoena necessary witnesses. *Id.* An appellate court is unlikely to find ineffective assistance on the basis of one alleged mistake. *State v. Carpenter*, 52 Wn. App. 680, 684-685, 763 P.2d 455 (1988). "The question is whether an attorney's representation amounted

to incompetence under ‘prevailing professional norms,’ not whether it deviated from best practices or most common custom.” *Harrington v. Richter*, 562 U.S. ____ , 131 S. Ct. 770, 788, 178 L. Ed. 2d. 624 (2011).

The reviewing court will defer to counsel’s strategic decision when the decision falls within a wide range of professionally competent assistance. *Strickland*, 466 U.S. at 489; *United States v. Layton*, 855 F.2d 1388, 1419-20 (9th Cir. 1988), *cert. denied*, 488 U.S. 948 (1988). If defense counsel’s trial conduct can be characterized as legitimate trial strategy or tactics, it cannot form a basis for a claim of ineffective assistance of counsel. *State v. Lord*, 117 Wn.2d 829, 883, 822 P.2d 177 (1991). The reviewing court must “strongly presume that counsel’s conduct constituted sound trial strategy.” *In re Pers. Restraint of Rice*, 118 Wn.2d 876, 888-89, 828 P.2d 1086, *cert. denied* 506 U.S. 958 (1992).

- a. Defense counsel was not ineffective for electing not to object during summation.

In order to prevail on a claim of ineffective assistance of counsel for a failure to object at trial, defendant must show that the objection would likely have been sustained. *State v. Saunders*, 91 Wn. App. 575, 578, 958 P.2d 364 (1998). Here, defendant cannot make such a showing. The prosecutor did not attempt to use impeachment testimony as substantive evidence of the crime. Rather, he reminded the jury that the

victim had given a statement to Deputy Simmelink that was inconsistent with his testimony on the stand. RP 311. The prosecutor stated:

Remember Deputy Simmelink? She told all the details that Jason Sullenger had told her. Okay. Jason Sullenger, he just couldn't remember those details when he was here at trial. He talked to Deputy Simmelink in September. It is now November. That's two months. Two months go by and you suddenly can't remember anything you said to the deputy? Is that reasonable? No."

RP 311. The prosecutor was arguing that this inconsistency made the victim's testimony that he did not remember the details of the assault not credible. RP 311. Because the evidence was admitted for the purpose of impeachment of Jason Sullenger, the prosecutor was entitled to use that evidence to argue that witness' credibility to the jury. The officer's testimony was used in closing argument for the purpose it was admitted, and an objection is unlikely to have been sustained, thus a decision not to object cannot be ineffective assistance of counsel. *Saunders*, 91 Wn. App. at 578.

Even if an objection to the prosecutor's statements would have been sustained, defendant must still show that there was no legitimate trial strategy behind defense counsel's lack of objection. *Lord*, 117 Wn.2d at 893. Whether or not to object is a classic example of trial strategy. *State v. Madison*, 53 Wn. App. 754, 763, 770 P.2d 662 (1989). Defense counsel may have wished to allow the State's argument because it boosted his own theory that Mr. Sullenger was not a reliable witness. By objecting

to the State pointing out that Mr. Sullenger's story had changed, defense counsel may have undermined his own argument that Mr. Sullenger's statements were inconsistent. Alternatively, defense counsel may have wished to avoid calling attention to the statement by lodging an objection. "Lawyers do not commonly object during closing argument 'absent egregious misstatements.' A decision not to object during summation is within the wide range of permissible professional legal conduct." *In re Davis*, 152 Wn. 2d 647, 717, 101 P.3d 1 (2004), quoting *United States v. Necochea*, 986 F.2d 1273, 1281 (9th Cir. 1993).

- b. Defense counsel's tactical decision not to offer a limiting instruction did not amount to ineffective assistance of counsel.

Defendant also alleges that defense counsel was ineffective for failing to offer limiting instructions regarding the use of impeachment evidence and ER 404(b) evidence. Appellant's brief at 1. However, Washington courts have repeatedly held that a decision not to offer limiting instructions is not ineffective assistance of counsel unless defendant can show that no legitimate trial strategy could support the decision. *State v. Barragan*, 102 Wn. App. 754, 762, 9 P.3d 942 (2000); *State v. Donald*, 68 Wn. App. 543, 551, 844 P.2d 447 (1993), review denied, 121 Wn.2d 1024, 854 P.2d 1084 (1993). It can be presumed when counsel elects not to offer a limiting instruction regarding evidence of prior bad acts, he does so in order to avoid reemphasizing damaging

evidence.” *State v. Price*, 126 Wn. App. 617, 649, 109 P.3d 27 (2005), citing *Barragan*, 102 Wn. App. at 762; and *Donald*, 68 Wn. App. at 551. Defendant must show that his counsel did not have a valid reason for declining to request the limiting instruction. Defendant cannot make this showing.

Defense counsel used cross examination of Mr. Sullenger to discredit his allegations on the 911 tape that defendant had killed a person for being a snitch on a prior occasion. RP 131-132. The decision not to offer a limiting instruction for that accusation is consistent with his defense theory that the allegations were simply false. Defense counsel may have wished to avoid lending credit to or reemphasizing the allegations by offering an instruction which would restate Mr. Sullenger’s statements. Because there is a legitimate trial strategy which supports defense counsel’s decision, that decision does not become ineffective assistance.

The record bears out that defense counsel considered offering instructions limiting the purpose of the evidence of witnesses’ prior bad acts and the prior bad acts of the defendant. RP 584-85. While his exact reasoning not to offer the instructions is not reflected in the record, his decision not to offer them for tactical reasons is. Defendant cannot show that there is no legitimate trial strategy behind this decision. *Barragan*, 102 Wn. App. at 762. Defense counsel may have wished to avoid reminding the jury of the witness’ and defendant’s prior misconduct. This

is a legitimate trial strategy under Washington jurisprudence. *Price*, 126 Wn. App. at 649, citing *Barragan*, 102 Wn. App. at 762; and *Donald*, 68 Wn. App. at 551.

c. Defendant cannot demonstrate any prejudice from counsel's tactical decisions.

The evidence presented at trial overwhelmingly supports the jury's convictions.¹ On the two charges of felony harassment, Mr. Sullenger and Mr. Bower both testified that after the attack, defendant had threatened to kill them and their children if they called the police. RP 60, 170, 196, 208; Exhibit 5. Mr. Sullenger also testified that his statement to police read, "[defendant] threatened to kill me and my family," but that he did not remember saying that. RP 62. Mr. Bower also testified that defendant had threatened to kill him. RP 195-96, 200, 205, 208-09. Both brothers had knowledge of defendant's access to weapons. RP 78, 199.

On the charges of witness tampering and intimidating a witness, Mr. Sullenger testified that defendant had come to Mr. Sullenger's house and threatened him. RP 69-71, 74, 76, 82. Each time defendant came to the house he told Mr. Sullenger to "think about his family" pointing to Mr. Sullenger's pregnant wife, and to "watch [his] fucking mouth." RP 70-71,

¹ Defendant alleges that only the convictions for felony harassment in counts II and III, intimidating a witness in count IV, and tampering with a witness, in count VII, require reversal. The State will therefore not address the evidence supporting the remaining convictions.

74. Defendant also told Mr. Sullenger that there were “people in line to take him out” if he testified at trial, and he should watch his back. RP 128.

Defendant cites the jury’s request to review documents referred to, but not entered into evidence, during trial as an indication of a reasonable probability that the outcome of the case would have been different but for counsel’s representation. Appellant’s brief at 18. However, questions from a jury cannot be used to impeach their verdict. *State v. Ng*, 110 Wn.2d 32, 43, 750 P.2d 632 (1988). “[Q]uestions from the jury are not final determinations, and the decision of the jury is contained exclusively in the verdict.” *State v. Miller*, 40 Wn. App. 483, 489, 698 P.2d 1123 (1985), citing *State v. Bockman*, 37 Wn. App. 474, 493, 682 P.2d 925 (1984). “The individual or collective thought processes leading to a verdict inhere in the verdict”. *State v. Crowell*, 92 Wn.2d 143, 594 P.2d 905 (1979) (internal quotations removed); citing *State v. McKenzie*, 56 Wn.2d 897, 355 P.2d 834 (1960); and *Gardner v. Malone*, 60 Wn.2d 836, 376 P.2d 651 (1962). The jury’s request to review documents during their deliberation is a part of their deliberative process, and does not imply any flaw in the verdict reached, or hint at what the verdict would have been had defendant been represented by different counsel. Moreover, the jury was not permitted to review any of the documents they requested, but rather, was informed by way of answer that the documents had neither been offered nor admitted at trial. CP 151. The jury had been properly

instructed that they were not permitted to consider evidence that was not admitted during trial in reaching their verdict. CP 75-109. A jury is presumed to have followed the instructions it is given. *State v. Gamble*, 168 Wn.2d 161, 178, 225 P.3d 973 (2010).

Defendant also cites to conflicting evidence arguing that it “clearly raised reasonable doubt.” Appellant’s brief at 18. However, matters of witness credibility and conflicting testimony are left to the trier of fact. *State v. Camarillo*, 115 Wn.2d 60, 71, 794 P.2d 850 (1990).

- d. The record as a whole demonstrates that defense counsel effectively represented the defendant.

Defendant’s focus on these individual actions by defense counsel distracts this Court from the standard of review for claims of ineffective assistance of counsel. Such claims are evaluated based on the record as a whole. *Ciskie*, 110 Wn.2d at 284. Defense counsel was clearly not deficient when the record is examined in its entirety. Far from being ineffective in representing his client, defense counsel ably presented his client’s case. Ultimately, defendant was convicted of the lesser included offense of assault in the fourth degree, a misdemeanor, not the charged offense of assault in the second degree, a felony. CP 13-16, 110-11. Defense counsel proposed the instructions on the lesser included charge. CP 68-72.

Moreover, there are ample indications in the record that defense counsel's representation was not deficient. Defense counsel called witnesses in defendant's favor, and cross examined the witnesses called by the State. RP 87, 129, 137, 149, 175, 201, 213, 247, 258, 264. Counsel made motions in limine to prevent the use of defendant's criminal history. RP 31. The court excluded one of defendant's convictions under ER 609. RP 32. Defense counsel also successfully prevented the State from using Mr. Sullenger's written statement as substantive evidence, and preventing any reference to defendant having ingested methamphetamine near the time of the incident, and any threats to kill Mr. Sullenger defendant had made prior to the charged incident. RP 114-15, 185-87.

Defense counsel objected throughout the course of the trial to testimony, questioning and evidence, and responded to objections made by the State. RP 118, 121, 147, 172, 183. Counsel also objected to the State's proposed instruction on attempted assault in the second degree, a class C felony, and proposed an instruction for the lesser included offense of assault in the fourth degree, on which defendant was ultimately convicted. CP 68-72, 73-74, RP 269-70. The court followed defense counsel's reasoning, and instructed the jury on the lesser included offense, but not on attempted assault in the second degree. CP 75-109; RP 269-70, 274.

Counsel made a closing argument in which he supported the defense theory of the case by highlighting Mr. Sullenger's inconsistent

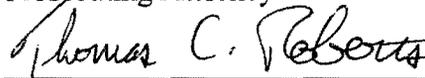
statements, his testimony about being intoxicated at the time of the incident, and that he had not reported the incident, suggesting he had not taken any threat seriously, and defendant had not injured him. RP 324-335. The record as a whole provides overwhelming indications that defense counsel was competent, and effective. Defendant has not shown that his attorney's representation amounted to incompetence under prevailing professional norms, which he must do in order to demonstrate ineffective assistance of counsel. *Richter*, 131 S. Ct. at 788.

D. CONCLUSION.

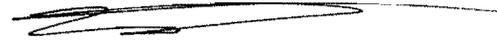
For the reasons above, the State respectfully requests that defendant's convictions and sentence be affirmed.

DATED: September 12, 2011

MARK LINDQUIST
Pierce County
Prosecuting Attorney



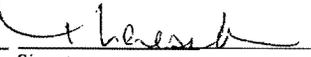
THOMAS C. ROBERTS
Deputy Prosecuting Attorney
WSB # 17442



MARGO MARTIN
Rule 9 Intern

Certificate of Service:

The undersigned certifies that on this day she delivered by ^e~~U.S.~~ mail or ABC-LMI delivery to the attorney of record for the appellant and appellant c/o his attorney true and correct copies of the document to which this certificate is attached. This statement is certified to be true and correct under penalty of perjury of the laws of the State of Washington. Signed at Tacoma, Washington, on the date below.

9-12-11 
Date Signature

PIERCE COUNTY PROSECUTOR

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Case Name: State v. Graham

Court of Appeals Case Number: 41596-8

Designation of Clerk's Papers Supplemental Designation of Clerk's Papers

Statement of Arrangements

Motion: ____

Answer/Reply to Motion: ____

■ Brief: Respondent's

Statement of Additional Authorities

Cost Bill

Objection to Cost Bill

Affidavit

Letter

Copy of Verbatim Report of Proceedings - No. of Volumes: ____

Hearing Date(s): _____

Personal Restraint Petition (PRP)

Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Other: _____

Sender Name: Therese M Kahn - Email: tnichol@co.pierce.wa.us

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

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