

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

NO. 41712-0-II

STATE OF WASHINGTON,

Respondent,

vs.

DAVID JOSEPH HARRIS,

Appellant.

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ON APPEAL FROM THE SUPERIOR COURT OF THE  
STATE OF WASHINGTON FOR CLALLAM COUNTY  
CAUSE NO. 10-1-00385-1

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**BRIEF OF RESPONDENT**

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**I. COUNTERSTATEMENT OF THE ISSUES:**

1. Did the trial court err by permitting the State to introduce two letters that the defendant attempted to mail while in the custody of the Clallam County Correctional Facility when (1) the defendant received notice that his outgoing mail was subject to inspection, (2) the correctional facility inspected the defendant's letters in accordance with its mail policy, and (3) the defendant's letters sought to arrange the absence of certain witnesses and influence the testimony of another?
2. If the trial court erred when it admitted the two letters, was the error harmless when (1) the untainted evidence established beyond a reasonable doubt that the defendant committed second-degree assault, and (2) the jury would have rejected the defendant's claim of self-defense even if the trial court had excluded the challenged letters?

**II. STATEMENT OF THE CASE:**

On September 3, 2010, David Harris (the defendant) visited the R-Bar, a pub located in downtown Port Angeles, Washington. *See e.g.* RP (12/6/2010) at 39-40, 47-49, 60, 67-68, 144; RP (12/7/2010) at 10-11, 70-71, 168. Whether due to alcohol or the frustration from several recent setbacks in life, Harris sought confrontations with various patrons and bar staff. *See e.g.* RP (12/6/2010) at 40-41, 49-54, 61, 63, 72-73; RP (12/7/2010) at 11-17, 76, 91-92, 94, 169. According to witnesses, Harris repeatedly stated that he was going to "get my niggars, [and] we're gonna

come back and shoot this place up.” RP (12/6/2010) at 41. *See also* RP (12/6/2010) at 53, 57; RP (12/7/2010) at 16. The bar’s security removed Harris from the premises. RP (12/6/2010) at 40.

Ernesto Sanchez-Andalob<sup>1</sup> was also at the R-Bar that same night. RP (12/7/2010) at 70-71. At approximately 1:30 a.m., Sanchez-Andalob exited the bar to find his friend, Victor Gallegos, involved in a heated confrontation with Harris. RP (12/7/2010) at 75-76, 91-92, 94. In an effort to diffuse the situation, Sanchez-Andalob approached Gallegos and asked him to leave.<sup>2</sup> RP (12/7/2010) at 78. Harris quickly descended upon Sanchez-Andalob. RP (12/7/2010) at 78. Sanchez-Andalob tried to react to Harris’s aggressive movement, but he could not respond in time. RP (12/7/2010) at 79, 94. The next thing Sanchez-Andalob remembered was waking up and being surrounded by emergency personnel. RP (12/7/2010) at 78. At the time of the assault, Sanchez-Andalob did not possess any weapons. RP (12/7/2010) at 74.

Sanchez-Andalob suffered two stab wounds: one to the left side of his chest, the other to his back buttock. RP (12/6/2010) at 33, 36-37; RP (12/7/2010) at 80. The injury was life threatening, resulting in a serious

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<sup>1</sup> Sanchez-Andalob is a man of slight build, weighing only 135 lbs. RP (12/7/2010) at 81.

<sup>2</sup> Sanchez-Andalob told Gallegos “let’s go” in Spanish. RP (12/7/2010) at 92.

drop in blood pressure. RP (12/6/2010) at 33. Additionally, the stab wound to Sanchez-Andalob's chest punctured his lung. RP (12/6/2010) at 33.

Several witnesses observed the assault. According to Joshua Johnston, it looked as if Harris had punched Sanchez-Andalob in the stomach. RP (12/6/2010) at 42. When Sanchez-Andalob doubled over and collapsed, Harris immediately ran from the scene. RP (12/6/2010) at 42. When Sanchez-Andalob removed his hand from his side, Johnston noticed that the victim was bleeding profusely. RP (12/6/2010) at 42.

According to Cameron Joutsen, Sanchez-Andalob never acted aggressively toward Harris. RP (12/7/2010) at 175. Nonetheless, Harris perform a "kind of round house swinging motion [in]to [] [Sanchez-Andalob's] ribs[.]" RP (12/7/2010) at 173. Joutsen then watched Harris flee the scene after knocking his victim to the ground. RP (12/7/2010) at 173. As Joutsen attended to Sanchez-Andalob, he too discovered that Sanchez-Andalob was bleeding copiously from a wound to the left side of his rib cage. RP (12/7/2010) at 174.

When police responded to the scene, officers found Sanchez-Andalob lying on the ground, bleeding, and surrounded by a multitude of bystanders. RP (12/6/2010) at 97-98. Officers also discovered a bloody knife on the ground. RP (12/6/2010) at 98. Subsequent testing of the knife

revealed Sanchez-Andalob's DNA on the blade, and Harris's DNA on the handle. RP (12/7/2010) at 114-17.

Rebecca Menges, a friend of Harris who was with him at the bar, tried to locate the defendant after the stabbing. RP (12/6/2010) at 77. Harris told Menges that "he was gone and he wasn't coming back." RP (12/6/2010) at 77. Harris also claimed that he had been "jumped" by three or five people. RP (12/6/2010) at 78.

While Harris was on the run, he visited the residence of Ali Snyder. Snyder awoke to the sound of pounding at her front door and a male's voice yelling that he had stabbed someone, probably killed him, and that there was a lot of blood. RP (12/6/2010) at 83-86. Terrified, Snyder refused to answer the door and called the police. RP (12/6/2010) at 87. Eventually, the male left. RP (12/6/2010) at 88. A subsequent investigation revealed Harris's blood on the front door of the Snyder residence. RP (12/6/2010) at 147-48; RP (12/7/2010) at 113.

Harris also sent a text message to his ex-wife, Tricia Harris, with whom he was recently divorced. RP (12/7/2010) at 29. This message cryptically read: "I'm sorry and I love you. Tell the kids I love them and I'm sorry." RP (12/7/2010) at 30.

Harris would later call his ex-wife and tell her that "[h]e was going to have to go away for a long time and possibly forever" because "he had

hurt somebody and that he had probably put them in the hospital.” RP (12/7/2010) at 31. According to Harris, he had “f-cked away” his marriage, his life, and his freedom. RP (12/7/2010) at 32.

In a second phone call, Harris reported to his ex-wife that he had acted in self-defense after he was attacked by three or five people. RP (12/7/2010) at 49-50. During a third call, after Harris had contacted an attorney, he told his wife that he now had a “game plan” and that he and his attorney would definitely claim self-defense at any future trial. RP (12/7/2010) at 50-52.

On September 7, 2010, Harris eventually surrendered himself to the Port Angeles Police Department (PAPD). RP (11/29/2010) at 17-18. After a brief interview, PAPD placed Harris under arrest. The State subsequently charged him with first-degree assault. CP 103.

While the prosecution was pending, Harris remained in the custody of the Clallam County Correctional Facility (CCCF). Officer Luke Brown provided Harris with his standard jail clothes and bedding. RP (12/8/2010) at 28-29. Additionally, Officer Brown supplied Harris with a copy of the jail’s rules and regulations. RP (12/8/2010) at 29. Officer Brown told Harris that he needed to read the regulations because inmates “can be held responsible and have infractions written out of the rule book against

them.” RP (12/8/2010) at 29. Harris acknowledged receipt of the jail’s rules/regulations. RP (12/8/2010) at 28-32. *See also* Exhibit 52.

The jail’s rules and regulations inform inmates and pre-trial detainees that CCCF staff may inspect their outgoing mail. RP (12/8/2010) at 14. *See* Ex. 53 at 18. Pursuant to this policy, Sergeant Don Wenzl reviews the outgoing mail that inmates and detainees send from the jail. RP (12/8/2010) at 18. Sergeant Wenzel explained various reasons support the mail policy, including the need to (1) maintain security and discipline within the jail, (2) prevent individuals inside or outside the jail from committing crimes, and (3) protect individuals named in protective orders. *See* RP (12/8/2010) at 22-23.

While Sergeant Wenzl was aware that Harris was in custody for a “notable crime,” and he did not have any specific security concern with respect to the defendant, he reviewed two letters written by Harris pursuant to the mail policy. RP (12/8/2010) at 18-20, 22-23. The first letter was addressed to Harris’s aunt, Linda Spritz:

Hey how’s it going[?] I need you or for you to get someone [else] to call Im[m]igration to have them pick up [and] deport Ernesto Sanche[z] Andalob ... he is an illegal alien. Also call the FBI and inform them that Victor Olvera Gallegos is using a stolen social security card ... and he is also illegal so inform INS of both of them and the FBI[.] This needs to be done ASAP[,] like yesterday. Please and thank you. ... This matter needs to be attended to right away. ...

Ex. 57. The second letter was addressed to Harris's ex-wife, Tricia Harris:

Hi[,] Trish. They postponed my trial until Dec[ember,] but I guess you know that since your being called as a witness against me. I don't know why since I never told you any details of my situation. I hope you realize I can[']t pay child support from prison and I can[']t be there for my kids. I think you hurt me enough in the divorce and don[']t understand why you would want to hurt me further. It[']s just not necessary to say anything negative about me. You weren[']t there and you don[']t know anything about this. ...

Ex. 58. Sergeant Wenzl seized the letters and provided them to law enforcement. RP (12/8/2010) at 37-38. The State introduced these letters as evidence of the defendant's consciousness of guilt. *See* RP (12/7/2010) at 154-57, 159-61; RP (12/8/2010) at 52.

At trial, the witnesses testified in accordance with the above facts. The defense requested a self-defense instruction, which the State did not oppose.<sup>3</sup> The jury rejected the theory that Harris acted in self-defense, but found he only committed the lesser-included offense of second-degree assault. CP 28. The jury also returned a special verdict finding that Harris used a deadly weapon in the commission of his crime. CP 27. The trial court subsequently sentenced Harris to a confinement term of 20 months. CP 12. Harris appeals. CP 6-8.

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<sup>3</sup> The trial court would later express its surprise that the State did not object to the requested instruction because there was little to no evidence to support such a claim of self-defense. *See* RP (12/21/2010) at 11-12, 20.

### III. ARGUMENT:

#### A. THE TRIAL COURT PROPERLY ADMITTED THE LETTERS.

Harris argues the trial court committed reversible error when it permitted the State to introduce two letters that he authored while in custody at the Clallam County Correctional Facility. *See* Brief of Appellant at 4-15. According to Harris, the State was required to obtain a warrant prior to inspecting his mail because security concerns did not support the inspection of his letters.<sup>4</sup> *See* Brief of Appellant at 4-15. The argument fails.

Neither the right of free speech, nor the right of privacy is absolute. The interests that these two rights protect must be weighed against important governmental interests. *Cohen v. California*, 403 U.S. 15, 19, 91 S.Ct. 1780, 29 L.Ed.2d 284 (1971); *Roe v. Wade*, 410 U.S. 113, 154, 93 S.Ct. 705, 35 L.Ed.2d 147 (1973). Given the realities of institutional confinement, any reasonable expectation of privacy that an inmate retains is necessarily diminished. *Hudson v. Palmer*, 468 U.S. 517, 530, 104 S.Ct. 3194, 82 L.Ed.2d 393 (1984); *Bell v. Wolfish*, 441 U.S. 520, 557, 99 S.Ct. 1861, 60 L.Ed.2d 447 (1979); *State v. Puapuaga*, 164 Wn.2d 515, 522-24,

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<sup>4</sup> Harris claims the inspecting officer was motivated purely by a desire to find evidence helpful to support the prosecution and his own curiosity. *See* Brief of Appellant at 12-13, 15.

192 P.3d 360 (2008); *State v. Archie*, 148 Wn. App. 198, 203-04, 199 P.3d 1005 (2009). Although inmates do not forfeit all constitutional protections by reason of their confinement, *Wolff v. McDonnell*, 418 U.S. 539, 555-56, 94 S.Ct. 2963, 41 L.Ed.2d 935 (1974), the threshold determination of whether a prisoner's expectation is "legitimate" or "reasonable," necessarily entails a balancing of the correctional institution's security interest against the privacy interest of the inmate. *Archie*, 148 Wn. App. at 201-04. This is true for convicted prisoners as well as pretrial detainees who remain cloaked with a presumption of innocence. *Archie*, 148 Wn. at 203-04 (citing *Wolfish*, 441 U.S. at 533).

The U.S. Supreme Court in *Stroud v. United States*, 251 U.S. 15, 40 S.Ct. 50, 64 L.Ed. 103 (1919), authorized the inspection of a prisoner's outgoing mail. According to the high court, the Fourth Amendment rights of the accused were not violated when letters containing incriminating material written by the inmate or detainee were intercepted by prison personnel and later used by the prosecution. *Stroud*, 251 U.S. at 21-22. In *Stroud*, the letters came into the State's possession via an establish practice, reasonably designed to promote institutional discipline. 251 U.S. at 21.

The U.S. Supreme Court reaffirmed that prison officials could inspect an inmate's outgoing mail without a warrant in *Procunier v.*

*Martinez*, 416 U.S. 396, 413-14, 94 S.Ct. 1800, 40 L.Ed.2d 224 (1974),  
overruled on other grounds by *Thornburgh v. Abbott*, 490 U.S. 401, 109  
S.Ct. 1874, 104 L.Ed.2d 459 (1989). Although it addressed the First  
Amendment, rather than Fourth Amendment rights, the *Martinez* court  
observed:

One of the primary functions of government is the preservation of societal order through enforcement of the criminal law, and the maintenance of penal institutions is an essential part of that task. The identifiable governmental interest at stake in this task are the preservation of internal order and discipline, the maintenance of institutional security against escape or unauthorized entry, and the rehabilitation of the prisoners. While the weight of professional opinion seems to be that inmate freedom to correspond with outsiders advances rather than retards the goal of rehabilitation, the legitimate governmental interest in the order and security of penal institutions justifies the imposition of certain restraints on inmate correspondence. Perhaps the most obvious example of justifiable censorship of prisoner mail would be refusal to send or deliver letters concerning escape plans or containing other information concerning proposed criminal activity, whether within or without the prison.

416 U.S. at 412-13. The Supreme Court held that censorship of an inmate's outgoing mail was justified if (1) the regulation or practice furthered an important or substantial governmental interest unrelated to the suppression of expression; and (2) the limitation of First Amendment freedoms was no greater than necessary to protect the particular governmental interest involved. *Martinez*, 416 U.S. at 413.

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The Washington Supreme Court also permits correctional staff to inspect an inmate's or pretrial detainee's outgoing mail:

Needless to say, and for very obvious security reasons, practically every jail and penal institution examines the letters and packages, incoming and outgoing, of all inmates. Certainly, there can be no claim of invasion of privacy under such circumstances.

*State v. Hawkins*, 70 Wn.2d 697, 704, 425 P.2d 390 (1967), *cert. denied*, 390 U.S. 912, 88 S.Ct. 840, 19 L.Ed.2d 883 (1968). Washington's courts have remained faithful to this rule. *See e.g. Robinson v. Peterson*, 87 Wn.2d 665, 670, 555 P.2d 1348 (1976), *overruled on other grounds by State v. WWJ Corporation*, 138 Wn.2d 595, 980 P.2d 1257 (1999); *State v. Archie*, 148 Wn. App. 198, 204, 199 P.3d 1005 (2009); *State v. Copeland*, 15 Wn. App. 374, 376-79, 549 P.2d 26 (1976).

Finally, numerous jurisdictions permit jail officials to inspect a prisoner's or pre-trial detainee's outgoing mail without a warrant. *See e.g. United States v. Whalen*, 940 F.2d 1027, 1034-35 (7th Cir. 1991); *United States v. Brown*, 878 F.2d 222, 225 (8th Cir. 1989); *Smith v. Shimp*, 562 F.2d 423, 427 (7th Cir. 1977); *United States v. Wilson*, 447 F.2d 1, 8 n. 4 (9th Cir. 1971); *State v. Wiley*, 355 N.C. 592, 604, 565 S.E.2d 22 (2002); *State v. Cuypers*, 481 N.W.2d 553, 557 (Minn. 1992); *State v. Matthews*, 217 Kan. 654, 657-58, 538 P.2d 637 (1975); *State v. McCoy*, 270 Or. 340,

343-48, 527 P.2d 725 (1974); *State v. Johnson*, 456 S.W.2d 1, 2-3 (Mo. 1970).

Here, the policy requiring jail staff to inspect inmate and pre-trial detainee mail serves important governmental interests. Sergeant Wenzl explained he opened Harris's letters pursuant to the jail's mail policy. RP (12/8/2010) at 19. The policy ensures the security of the correctional facility, prevents further crimes, and protects victims. RP (12/8/2010) at 22. Sergeant Wenzl conceded specific security concerns may not always be at the forefront of his mind when opening and reading outgoing mail,<sup>5</sup> but the policy authorizing the inspection exists to serve legitimate penological objectives – including security. RP (12/8/2010) at 19, 22-23. Moreover, due to the nature of the crime committed, Sergeant Wenzl believed an order would be in place prohibiting Harris from having any contact (direct or indirect) with his victim. RP (12/8/2010) at 24. Finally, Sergeant Wenzl explained that the jail's ability to address threats to security or victims would be compromised if it was unable to read outgoing mail. *See* RP (12/8/2010) at 22.

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<sup>5</sup> Nothing in the record supports the allegation prison staff opened the outgoing mail for the sole purpose of finding evidence helpful to the prosecution. While Sergeant Wenzl testified the crime Harris committed had some notoriety, *see* RP (12/8/2010) at 18, 20, he affirmed that he read the defendant's pursuant to the mail policy that seeks to (1) ensure the jail's security, (2) prevent the commission of crimes, and (3) protect the parties named in no contact orders. RP (12/8/2010) at 22.

Harris argues security concerns did not support the inspection of his outgoing mail. *See* Brief of Appellant at 12-13, 15. As stated above, the record does not support this claim. Moreover, even though there was no evidence that Harris actually intended to use the mail to facilitate an escape, undermine the jail's security, or commit a crime, such proof is not necessary. *Martinez*, 416 U.S. at 413-14; *Peterson*, 87 Wn.2d at 674, *Shimp*, 562 F.2d at 426. This court may take judicial notice of the fact that an opportunity for secret and lengthy communication between a detainee and his friends or relatives would increase the likelihood of a successful escape. *Shimp*, 562 F.2d at 426. Over the course of time, some inmates would take advantage of such an opportunity, which would ultimately compromise the security of the facility. *Shimp*, 562 F.2d at 426 (citing *McDonnell*, 418 U.S. at 577 (proof not required to establish possibility that letters, including those from apparent attorneys, might contain contraband)). Accordingly, unmonitored inmate mail threatens jail security. *Shimp*, 562 F.2d at 426. Thus, Sergeant Wenzl's inspection of the mail without a warrant does not constitute an unlawful search.<sup>6</sup> *See Peterson*, 87 Wn.2d at 674 (probable cause is not required to inspect an inmate's outgoing mail).

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<sup>6</sup> From a practical standpoint, jail staff cannot ascertain whether letters include information/requests that would threaten security, promote crime, or endanger victims unless they first read the outgoing mail.

Additionally, Harris did not have a reasonable expectation that his outgoing mail would remain private. At all times during the pendency of the underlying prosecution, Harris remained in the custody of the county jail. After Harris's first appearance, Officer Brown provided him with a copy the jail's rules and regulations. RP (12/8/2010) at 28-30. *See also* RP (12/8/2010) at 6-7. Officer Brown instructed Harris to read the rulebook. RP (12/8/2010) at 29. Harris acknowledged that he received a copy of the rules/regulations. RP (12/8/2010) at 32. *See also* Ex. 52. These rules/regulations advised him that outgoing mail was subject to inspection and censorship. RP (12/8/2010) at 14. *See also* Ex. 53 at 18 n. 15. Finally, circumstantial evidence established that Harris read the rules/regulation before he mailed the letters in question because he submitted a grievance to jail staff and only the rules/regulations informed inmates how to submit such complaints. RP (12/8/2010) at 45-46. *See also* Ex. 60. This Court should hold Harris did not have a reasonable expectation that his outgoing mail would remain private because (1) he was an inmate of the county jail, and (2) he received notice that his outgoing mail was subject to inspection.

Finally, the challenged practice does not constitute a blanket prohibition on any communication by pretrial detainees. Pretrial detainees are permitted to send and accept mail, make telephone calls, and receive visitors. *See* Ex. 53 at 11-18. The mail policy requires that a detainee

receive notice of any letter that is censored, and it permits the detainee to challenge such action. *See* Ex. 54 at 2. Finally, this case does not involve surreptitious or otherwise unexpected intrusion upon privacy by the government because the jail staff informs the inmates/detainees that their nonprivileged mail may be read. *See* Ex. 53 at 16-18. Because the jail's policy furthers an important government interest, unrelated to the suppression of expression, the resulting search was lawful.

In sum, no warrant was required prior to the review of Harris's outgoing mail. The jail had a right to examine the letters Harris attempted to mail from the correctional facility. Since Sergeant Wenzl lawfully inspected the letters in question, no rule required the State to close its eyes to what they discovered therein. *McCoy*, 270 Or. at 347. The trial court did not err when it allowed the State to introduce the letters that Harris attempted to mail from the jail.

B. IF THERE WAS AN ERROR, THE ERROR  
WAS HARMLESS.

Harris argues the introduction of his letters into evidence resulted in prejudicial error. *See* Brief of Appellant at 15-16. According to him, "it is entirely likely that the jury dismissed their doubts [regarding self-defense] on the basis of the letters." *See* Brief of Appellant at 16. This argument is unpersuasive.

The State bears the burden of showing a constitutional error was harmless. *State v. Easter*, 130 Wn.2d 228, 242, 922 P.2d 1285 (1996). Constitutional error is harmless if the appellate court is convinced beyond a reasonable doubt that any reasonable jury would reach the same result absent the error, and where the untainted evidence is so overwhelming that it necessarily leads to a finding of guilt. *Easter*, 130 Wn.2d at 242.

Here, the untainted evidence was so overwhelming that it necessarily supports Harris's conviction for second-degree assault. "A person is guilty of assault in the second degree if he or she ... [i]ntentionally assaults another and thereby recklessly inflicts substantial bodily harm; or ... [a]ssaults another with a deadly weapon[.]" RCW 9A.36.021(1)(a), (c).<sup>7</sup> Here, there was overwhelming evidence that Harris intentionally assaulted Sanchez-Andalob with a deadly weapon, and that he recklessly inflicted substantial bodily harm. Sanchez-Andalob testified it was the defendant who assaulted him. RP (12/7/2010) at 78-79, 94. This was confirmed by both Johnston and Joutsen. RP (12/6/2010) at 42; RP (12/7/2010) at 173. Due to the assault, Sanchez-Andalob suffered two stab wounds, which produced life-threatening injuries. RP (12/6/2010) at 33, 36-37; RP (12/7/2010) at 80. Finally, the bloody knife found at the scene had Sanchez-Andalob's DNA on the blade and Harris's DNA on the

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<sup>7</sup> Laws of Washington 2007 c. 79 § 2.

handle. RP (12/6/2010) at 98; RP (12/7/2010) at 114-17. There is overwhelming evidence to support the defendant's conviction for second-degree assault.

While Harris told his ex-wife and friends, none of whom witness the assault, that he was "jumped" by three or five people outside the bar, there was no evidence to support his claim that he acted in self-defense. The witnesses who actually observed the assault testified that Harris was the aggressor, and that Sanchez-Andalob never acted in an hostile manner toward the defendant. *See* RP (12/7/2010) at 78, 175. Under these facts, a jury could not reasonably find the defendant acted in self-defense. *See State v. Walden*, 131 Wn.2d 469, 482-83, 932 P.2d 1237 (1997) (a self-defense instruction is not available to an aggressor). Additionally, Sanchez-Andalob was unarmed, Harris was considerably larger than his victim, and the assault occurred in a public setting with security nearby. *See e.g.* RP (12/6/2010) at 40-41, 97-98; RP (12/7/2010) at 74-75, 81. Thus, a jury could not reasonably find that Harris's only used the level of force necessary to deter an attack. *See* RCW 9A.16.020(3); WPIC 17.02. This Court should hold that the jury would have reached the same conclusion, even if the trial court had excluded the letters. Any error was harmless.

IV. CONCLUSION:

Based on the arguments above, the State respectfully requests that this Court affirm Harris's conviction and sentence for second-degree assault.

DATED this October 28, 2011.

DEBORAH S. KELLY, Prosecuting Attorney



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# CLALLAM COUNTY PROSECUTOR

## October 28, 2011 - 5:25 PM

### Transmittal Letter

Document Uploaded: 417120-Respondent's Brief.pdf

Case Name: State v. David Joseph Harris

Court of Appeals Case Number: 41712-0

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: \_\_\_\_\_

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