

NO. 42179-8-II

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

STATE OF WASHINGTON, RESPONDENT

v.

CHRISTOPHER SAUNDERS, APPELLANT

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Appeal from the Superior Court of Pierce County  
The Honorable Bryan Chushcoff

No. 10-1-02525-3

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**Respondent's Brief**

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

1. Was defendant's arraignment date the actual date of arraignment where the court rules no longer permit a constructive arraignment date under the *Striker* rule?
2. Was defendant brought to trial within the time allowed under CrR 3.3, where the court properly continued the case as necessary in the administration of justice?
3. Has defendant failed to meet the burden to show ineffective assistance of counsel, where the court is unlikely to have sustained an objection to the date of arraignment under the superseded *Striker* rule?

B. STATEMENT OF THE CASE.

1. Procedure

Defendant was convicted of rape of a child in 1993. CP 141-44. This conviction carried with it an indefinite sex offender registration requirement. CP 121-22. Defendant was transient and complied with the weekly transient registration requirement after his most recent release

from custody until March 17, 2010. RP 114-48<sup>1</sup>. Defendant failed to register the following week and thereafter. RP 148-49.

Defendant was not permitted to consume alcohol or drugs under the conditions of his community custody. RP 171. However, a urine sample given by defendant on March 18, 2010, showed the presence of methamphetamine. RP 171.

On May 6, 2010, defendant was arrested on a DOC warrant and booked into the Pierce County jail for violations of his community custody requirements. CP 24, 74, RP 172, 174. The following day, defendant was transferred to Snohomish County Jail. The Snohomish County Superior Court found defendant in violation of his community custody requirements and imposed a sanction of 150 days confinement in DOC custody, which defendant served in a facility in Snohomish County. CP 75.

On June 10, 2010, the State filed an information in Pierce County Superior Court charging defendant with one count of failure to register as a sex offender. CP 1. On June 11, 2010, the State sought, and the court granted, a bench warrant for defendant's arrest. CP 4, 74-77. DOC placed a hold on defendant for transport to Pierce County upon completion of the 150 day sanction in DOC custody. CP 74-77.

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<sup>1</sup> Because the transcripts for this case are not consecutively numbered the State will refer to them as RP(date of proceedings) with the exception of the consecutively numbered transcripts of the jury trial on May 9, 10 and 11, 2011, which will be referred to as RP.

On August 17, 2010, defendant was transported from the DOC facility where he had served the time for his sanction back to the Pierce County Jail and was arraigned on the following day, August 18, 2010, in Pierce County Superior Court. CP 74-77. Defendant did not appear in Pierce County Superior Court at any time between the filing of the information on June 11, 2010, and his arraignment on August 18, 2010. RP (12/16/2010) 10-11, CP 74-77.

On September 23, 2010, defense counsel requested a trial continuance to allow him to prepare pretrial motions. RP (09/23/2010) 2. Defendant personally objected to any continuances. *Id.* The court granted the continuance over defendant's objection because defense counsel wanted additional time to file the motion in accordance with defendant's wishes. *Id.* at 3-4, CP 7.

The case was continued, over defendant's objection, a number of other times for various reasons. CP 47, 70-72, 79, 116-17. On May 9, 2011, defendant moved to precede *pro se*. RP 12-13. After a colloquy with defendant, the trial court granted his request. RP 20. A jury trial began the same day. RP 29. The jury found defendant guilty of failing to register as a sex offender on May 11, 2011. CP 140, RP 258. On May 13, 2011, the court sentenced defendant to 57 months, the high end of the standard range sentence for defendant's offender score of 9+. CP 145-160.

Defendant entered a timely notice of appeal on May 31, 2011. CP 161-63.

## 2. Facts

An offender is required to undertake a number of procedures in order to register with the Pierce County Sheriff's Department Sex Offender Registration Unit. RP 93. This includes filling out a packet of forms which includes fingerprints, photographs and a DNA sample unless those items are already on file with the unit. RP 95. The packet of forms requires that the offender fill out and sign an address registration, and acknowledge they have read the statute which explains the requirements. RP 96. Defendant had registered with the unit between December 30, 2009 and March 17, 2010. RP 113-141. Defendant was registered as transient, which required that he register once a week. Defendant was next required to report on March 24, 2010, but failed to do so. RP 148.

Detective Curtis Wright of the Pierce County Sheriff's Department checked to see if defendant was registered in another jurisdiction, or was in custody. RP 163. Defendant was neither in custody at the time, nor registered somewhere else. RP 163-64.

Not only was defendant required to register with the sheriff's department, he was also required to notify the department of corrections if he had any change of address. RP 170. On March 17, 2010 defendant

reported to DOC, he listed his status as transient on the forms he filled out for his CCO. RP 173.

Defendant was also not permitted to consume alcohol or any controlled substances. RP 171. A urine sample was collected from defendant by the Department of Corrections on March 18, 2010. RP 171. That sample came back positive for methamphetamine. RP 171-72. Following the positive test, defendant failed to report to DOC. RP 172.

On March 22, 2010, Officer Haberman's partner, CCO Ullman, requested a warrant because defendant had failed to charge his GPS monitoring device. RP 172. Defendant was arrested on that warrant on May 6, 2010. RP 174.

Defendant testified that he had not registered with the Pierce County Sheriff's Department after March 24, 2010. RP 208. Defendant also acknowledged that he had not told his CCO that he had an address he was residing at, and that when he failed to check in with his CCO, the warrant issued for him remained outstanding for approximately five weeks because no one knew where to find him. RP 208-09.

C. ARGUMENT.

CrR 4.1 and the rules governing time for trial<sup>2</sup> in CrR 3.3 were substantially re-written in 2003. *State v. Rookhuyzen*, 148 Wn. App. 394, 395, 200 P.3d 258 (2009).

1. DEFENDANT WAS ARRAIGNED WITHIN THE TIME ALLOWED BY CrR 4.1.

The time allowed for arraignment of a defendant is governed by CrR 4.1. The pertinent portion of the rule sets a time limit for the arraignment of a defendant not detained in the jail of the county in which the charges are filed. CrR 4.1(a)(2). Under that section of the rule, a defendant must be arraigned within 14 days of the first appearance before the court after the filing of the information. CrR 4.1(a)(2). “Any delay in bringing the defendant before the court shall not affect the allowable time for arraignment, regardless of the reason for that delay.” CrR 4.1(a)(2). A defendant held in custody in a facility other than the jail of the county in which the charges are filed is subject to the out of custody time limit under CrR 4.1(a)(2), not the in custody time limit under CrR 4.1(a)(1).

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<sup>2</sup> The State refers to CrR 3.3 as the time for trial rule in order to prevent it being confused with the Constitutional right to a speedy trial under the state and federal Constitutions. Defendant does not raise a Constitutional speedy trial challenge. Accordingly, the State confines its briefing to the time for trial issue.

Under the current version of the rule, a defendant must be arraigned within 14 days of his first appearance before the court after the filing of the information, unless he is detained in the jail of the county where the charges are filed. CrR 4.1(2). Here, defendant was detained in a DOC facility in Snohomish County on June 10, 2010 when the charges were filed by information in Pierce County. RP(12/16/2010) 10-11; CP 1, 74-77. He was transferred to Pierce County on August 17, 2010. CP 74-77. Defendant first appeared before the Pierce County Superior court on August 18, 2010, and was arraigned during that appearance. RP (08/18/2010) 2. Because defendant was arraigned on the date of his first appearance before the Pierce County Superior Court after the filing of the information, he was arraigned within the time allotted under the current version of CrR 4.1(a)(2).

Prior to the 2003 amendments, CrR 3.3 and 4.1 were interpreted to require that an out-of-custody defendant must be arraigned within 14 days of the charges being filed. *State v. Striker*, 87 Wn.2d 870, 557 P.2d 847 (1976). Under this rule, known as the *Striker* rule, for the purposes of calculating the time for trial, a defendant was deemed to have been arraigned 14 days after the filing of the information when they were arraigned any time after that date. *State v. Greenwood*, 120 Wn.2d 585, 845 P.2d 971 (1993). “The 2003 amendments to CrR 3.3 and 4.1 eliminated the judicially created doctrine of constructive arraignment --

the *Striker* rule.” *Rookhuyzen*, 148 Wn. App. at 395, *see also State v. Castillo*, 129 Wn. App. 828, 831, 120 P.3d 137 (2005); *State v. Olmos*, 129 Wn. App. 750, 756, 120 P.3d 139 (2005).

Relying on the superseded *Striker* and *Greenwood* cases, defendant argues that because he was not arraigned within 14 days of the filing of the information, if the state cannot show good faith and due diligence in bringing defendant before the court to be arraigned, the defendant will be deemed to have been arraigned as of 14 days following the filing of the information. Appellant’s brief at 8-9. However, this “*Striker* rule” is no longer valid because it was superseded by the 2003 amendments to CrR 3.3 and 4.1. *Rookhuyzen*, 148 Wn. App. at 398.

There is no provision under the 2003 amendments to CrR 3.3 and 4.1 which allows for a “constructive arraignment date.” *Rookhuyzen*, 148 Wn. App. at 398. Rather, the plain language of CrR 4.1 prohibits a case being dismissed for time for trial reasons unless expressly required by a rule, statute, or by a violation of defendant’s Constitutional speedy trial rights. *Rookhuyzen*, 148 Wn. App. at 398, *citing Olmos*, 129 Wn. App. 750. The court in *Rookhuyzen* found that the plain language does not require the State to show it had exercised good faith and due diligence in bringing defendant before the court. 148 Wn. App. at 389-99, *citing State v. George*, 160 Wn.2d 727, 738, 158 P.3d 1169 (2007)(analyzing the same question under the identical provisions of CrRLJ 3.3(c)(2)(ii)).

Because the 2003 amendments to CrR 4.1 and 3.3 supersede the *Striker* rule and defendant was arraigned during his first appearance before the court after the charges were filed, defendant's arraignment was timely and proper.

2. DEFENDANT WAS BROUGHT TO TRIAL WITHIN THE TIME ALLOWED UNDER CrR 3.3.

CrR 3.3 provides that once arraigned, a defendant must be brought to trial within the time limit contained within the rule. CrR 3.3(b)(2) provides that a defendant who is detained in jail must be brought to trial within 60 days of the arraignment date determined under CrR 4.1. CrR 3.3(b)(1)(i), (c)(1).

a. Two potentially problematic continuances granted in this case were valid.

The court may affirm on any ground adequately supported by the record, even if the trial court did not consider that ground. *State v. Costich*, 152 Wn.2d 463, 477, 98 P.3d 795 (2004). A continuance may be granted by the court either if the parties have agreed to that continuance or on the motion of the court or any party where the continuance is necessary in the administration of justice. CrR 3.3(f)(1)(2). In order to be granted as an agreement of the parties, the defendant himself must sign the continuance agreement. CrR 3.3(f)(1). However, under CrR 3.3(f)(2), the court or any party may move for a continuance and the court may grant such a continuance where it is required in the administration of justice and

will not prejudice the defendant in his defense. CrR 3.3(f)(2).

i. **Continuance granted on  
September 23, 2010.**

On September 23, 2010, defense counsel requested a continuance in order to have time to prepare and file a motion to dismiss the case. RP(09/23/2010) 3-4. This was the first time a continuance was requested in the case. CP 169. However, the court granted this motion “on the agreement of the parties.” CP 7. Defendant refused to sign. *Id.*

Because the defendant refused to sign, the court lacked authority to grant a continuance on agreement of the parties. CrR 3.3(f)(1). However, the facts before the court were also sufficient to allow it to grant the continuance under CrR 3.3(f)(2), so long as the continuance would not prejudice the defendant in the presentation of his defense and was necessary in the administration of justice.

The record shows that defendant wished to file a motion to dismiss his case for a violation of the timely arraignment rules in CrR 4.1. RP (09/23/2010) 2-3. It was defense counsel who requested the continuance in order to prepare that motion. *Id.*, CP 7. The record indicates that the State was prepared to go to trial on the day they appeared in court, and that no continuance would be necessary if the defense did not need additional time to prepare the motion. RP(09/23/2010) 2. Defendant did not want to continue the case, but did want the issue of timely arraignment to be argued by his counsel. RP(09/23/2010) 3-4. The court determined that

defense counsel should be granted extra time in order to serve his client's desire to have a motion filed. RP (09/23/2010) 4-5.

The trial court's error was in granting the continuance as agreed, rather than in the administration of justice. Although the court erred in granting defense counsel's motion to continue under CrR 3.3(f)(1) where the defendant refused to sign, the court had authority to continue to trial under CrR 3.3(f)(2) in the administration of justice. The court had proper authority to continue the case because defense counsel had asked for additional time to prepare the motion. RP(09/23/2010) 2, 4. The record indicates that defendant would not be prejudiced by such a continuance because it was to allow defense counsel adequate time to prepare the case, specifically, the motion that defendant personally wanted. RP(09/23/2010) 2, 3.

Because this Court may affirm the lower courts ruling on any grounds supported by the record, the continuance should be affirmed.

ii. **Continuance granted on December 16, 2010.**

On the December 16, 2010 trial date, the court heard defendant's motion to dismiss for violation of CrR 4.1. RP (12/16/2010) 4. The court denied defendant's motion. CP 73. The court then entered an order off the record continuing trial until January 3, 2011 by agreement of the

parties under CrR 3.3(f)(1). CP 72. However, defendant again refused to sign. CP 72.

Without defendant's signature, the court erred in entering a continuance under CrR 3.3(f)(1). Notwithstanding this error, the court had authority to enter a continuance under CrR 3.3(f)(2) in the administration of justice. The record shows that there would be no prejudice to defendant in the presentation of his case due to the delay, and that the administration of justice required the continuance, as defense counsel had indicated to the court during the motion hearing that the trial would have to be on another date. RP(12/16/2010) 4, 33.

Additionally, if this court were to hold the continuance entered on December 16, 2010 was in error, such error was harmless. As explained below, the time for trial did not expire before the case was again continued even if this continuance was legally deficient.

b. Defendant's time for trial had not expired before defendant was brought to trial in this case.

The time for trial calculation provides for a number of excluded periods, including the disqualification of a judge, and continuances granted under the rule. CrR 3.3(e)(3)(9), 3.3(f). The period of time during a continuance is not counted toward the time for trial where it is granted either by written agreement of the parties or where it is required in the

administration of justice. CrR 3.3(f). The time for trial after any excluded period cannot be less than 30 days. CrR 3.3(b)(5).

Commencing the time for trial calculation on the date of defendant's arraignment, August 18, 2010, and allowing for the 60 days permitted under CrR 3.3(b)(i), defendant's initial time for trial expiration date was October 16, 2010.

The order on September 23, 2010, continued the trial date to November 15, 2010. CP 7. Because the time for trial remaining on November 15, 2010 would have been less than 30 days, the time for trial expiration date was set at the minimum 30 days after November 15, 2010. *See* CrR 3.3(b)(5). Therefore, defendant's time for trial expiration date was December 15, 2010.

The order entered on November 15, 2010 continued trial to December 7, 2010. CP 47. The order was entered in the administration of justice under CrR 3.3(f)(2) because defense counsel was unavailable. *Id.* Because time for trial after any excluded period cannot be less than 30 days, the time for trial remaining on December 7, 2010 was 30 days. *See* CrR 3.3(b)(5). Therefore, the expiration was January 6, 2010.

The order entered on December 7, 2010 continued trial to December 13, 2010. CP 70. The order was entered in the administration of justice under CrR 3.3(f)(2) because the prosecuting attorney was in trial on another case and defense counsel was unavailable. *Id.* Because the time for trial remaining after any excluded period cannot be less than 30

days, the time for trial remaining on December 13, 2010 was 30 days. *See* CrR 3.3(b)(5). Therefore, the expiration was January 12, 2010.

The order entered on December 13, 2010 continued trial to December 16, 2010. CP 71. The order was entered in the administration of justice under CrR 3.3(f)(2) because the prosecutor was in trial on another case. *Id.* Because time for trial remaining after any excluded period cannot be less than 30 days, the time for trial remaining on December 16, 2010 was 30 days. *See* CrR 3.3(b)(5). Therefore, the expiration was January 15, 2010.

On December 16, 2010, the court entered a continuance under CrR 3.3(f)(1), by agreement of the parties. CP 72. As discussed in section (a)(ii) above, the court erred when it listed the reason for the continuance as being by agreement of the parties where defendant refused to sign. However, because the record supports the grant of the continuance in the administration of justice it was valid. The State will assume, for purposes of argument only, that this continuance was not valid in order to demonstrate that nevertheless the time for trial did not expire.

However, even if this Court were to hold that the continuance order on December 16, 2010 is invalid, the time for trial had not expired when defendant next came to court. This is because the time for trial remaining on December 13, 2010, was 30 days. Three days later, defendant entered an affidavit of prejudice on December 16, 2010. CP 170.

Under CrR 3.3(e)(3)(9), the filing of an affidavit of prejudice began a 5 day period excluded from the time for trial calculation. The excluded period ended on December 21, 2010. The time for trial after this excluded period cannot be less than 30 days under CrR 3.3(b)(5). Thus, the time for trial remaining as of December 21, 2010 was 30 days, making the expiration date January 20, 2011. Defendant appeared before the court again on January 3, 2011, fourteen days before time for trial expired. RP (01/03/2011) 2.

Because the court entered a valid continuance on January 3, 2011, under CrR 3.3(f)(2) due to a witness' unavailability, the case again entered an excluded period under CrR 3.3(e)(3). CP 79, RP(01/03/2011) 4. Hence, even if the court erred in entering a continuance on December 16, 2010, the time for trial rule was not violated.

On January 3, 2011, the court ordered a continuance until March 24, 2011. CP 79. The court entered this order under CrR 3.3(f)(2) as necessary in the administration of justice because the law enforcement witness was unavailable due to a surgery and necessary recovery time. *Id.* The time for trial remaining on March 24, 2011 was 35 days, making the expiration date April 29, 2011.

On March 24, 2011, the court ordered a continuance until May 5, 2011. CP 116. The court entered this order under CrR 3.3(f)(2) as necessary in the administration of justice because the law enforcement

witness was still unavailable due to his surgery and necessary recovery. *Id.* Time for trial remaining on May 5, 2011 was 30 days, making the expiration date June 4, 2011.

Trial began on May 9, 2011, at which point the remaining time for trial was 26 days. Thus, trial began within the time allotted under CrR 3.3(b)(1)(i)(ii).

Defendant argues that if the court were to apply a constructive arraignment date 14 days after the charges were filed, defendant must be brought to trial within 90 days of that constructive arraignment date. Appellant's brief at 9. Because his first trial date was set after this, he claims the court failed to comply with CrR 3.3. *Id.* In making this argument, defendant relies on the law prior to the 2003 amendments to the criminal rules. *Id.*

However, defendant's argument fails because the commencement date in CrR 3.3(c)(1) is no longer determined based on a constructive arraignment date. *See Rookhuyzen*, 148 Wn. App. at 398. Rather, under the plain language of CrR 4.1, it is the date defendant first appears in court, thereby making the time for trial commencement date August 18, 2010, the date he was arraigned.

As discussed in Section 1 above, defendant was not entitled to a constructive arraignment date under the current rule. With the periods excluded from the time for trial calculation and the 30 day minimum

buffer after each, the defendant was brought to trial within the time limits in CrR 3.3.

3. DEFENSE COUNSEL WAS NOT INEFFECTIVE WHERE AN OBJECTION TO THE TIMELY ARRAIGNMENT WOULD NOT HAVE BEEN SUSTAINED.

Defendant argues in the alternative that if he is prevented from raising the time for trial arraignment issue because of waiver, his trial counsel was ineffective for failing to object on the date of arraignment. Appellant's brief at 14.

"The essence of an ineffective-assistance claim is that counsel's unprofessional errors so upset the adversarial balance between defense and prosecution that the [proceeding] 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, 751 P.2d 1165 (1988), *see also State v. White*, 81 Wn.2d 223, 225, 500 P.2d 964 (1993), *review denied*, 123 Wn.2d 1004 (1994). "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." *Premo v. Moore*, 562 U.S. \_\_\_\_, 131 S. Ct. 733, 740, 178 L. Ed. 2d. 649 (2011), *quoting Strickland*, 466 U.S. at 690, *see also Harrington v. Richter*, 562 U.S. \_\_\_\_, 131 S. Ct. 770, 778, 178 L. Ed. 2d 624 (2011). 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). In order to meet the first prong of the test in *Strickland* where the claim of ineffective assistance of counsel is based on 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 a showing that his trial counsel was ineffective for not objecting to the arraignment date, nor can he show that he was prejudiced. As discussed above, defendant was brought before the court for arraignment on the same day that he first appeared in the Pierce County Superior Court after the charges were filed. CP 74-77; RP(08/18/2010) 1; RP(12/16/2010) 10-11. Because he was arraigned within the time limits prescribed in CrR 4.1, defense counsel's objection to the arraignment date would have had no basis in law. Defense counsel cannot have been ineffective for not objecting where the court would not have sustained the objection.

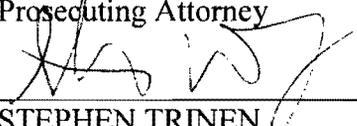
Moreover, because defendant's time for trial never expired under the rules, he suffered no prejudice.

D. CONCLUSION.

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

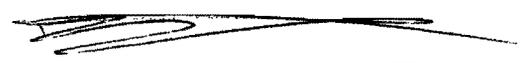
DATED: June 1, 2012.

MARK LINDQUIST  
Pierce County  
Prosecuting Attorney



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STEPHEN TRINEN  
Deputy Prosecuting Attorney  
WSB # 30925

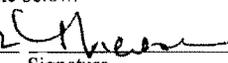


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Margo Martin  
Rule 9 Legal Intern

Certificate of Service:

The undersigned certifies that on this day she delivered by 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.

01.12.12 

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Date Signature

# PIERCE COUNTY PROSECUTOR

## June 01, 2012 - 2:30 PM

### Transmittal Letter

Document Uploaded: 421798-Respondent's Brief.pdf

Case Name: State v. Saunders

Court of Appeals Case Number: 42179-8

**Is this a Personal Restraint Petition?** Yes  No

#### The document being Filed is:

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: \_\_\_\_\_

#### Comments:

No Comments were entered.

Sender Name: Therese M Kahn - Email: [tnichol@co.pierce.wa.us](mailto:tnichol@co.pierce.wa.us)

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

[SCCAAttorney@yahoo.com](mailto:SCCAAttorney@yahoo.com)