

**NO. 44167-5-II**

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

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STATE OF WASHINGTON,

Respondent,

v.

**WHITNEY JEAN WHITED,**

Appellant.

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ON APPEAL FROM THE SUPERIOR COURT OF THE  
STATE OF WASHINGTON FOR THURSTON COUNTY

The Honorable Gary R. Tabor, Judge  
The Honorable Lisa Sutton, Judge

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**BRIEF OF APPELLANT**

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LISA E. TABBUT  
Attorney for Appellant  
P. O. Box 1396  
Longview, WA 98632  
(360) 425-8155

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**A. ASSIGNMENTS OF ERROR**

1. Ms. Whited was denied her constitutional right to effective assistance of counsel where defense counsel failed to propose an unwitting possession instruction when the evidence supported such an instruction and Ms. Whited was prejudiced by counsel's failure to propose the instruction.

2. The community custody condition ordering Ms. Whited to "not associate with those who use, sell, possess, or manufacture controlled substances" is unconstitutionally vague.

**B. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR**

1. Is reversal required where Ms. Whited was denied her right to effective assistance of counsel where defense counsel failed to propose an unwitting possession instruction and Ms. Whited was prejudiced by counsel's failure to propose the instructions because there is a reasonable probability that, but for counsel's errors, the result of the trial would have been different?

2. Due process requires that conditions of community custody must be definite enough that ordinary people can understand what conduct is prohibited. The trial court ordered Ms. Whited to "not associate with those who use, sell, possess, or manufacture controlled substances" as a condition of community custody. Is the condition unconstitutionally

vague because it fails to differentiate between legal and illegal conduct with controlled substances?

## **C. STATEMENT OF THE CASE**

### **1. Procedural History.**

Whitney Whited was arrested and charged with Unlawful Possession of Methamphetamine<sup>1</sup> and Unlawful Use of Drug Paraphernalia.<sup>2</sup> CP 3. Prior to trial, the court heard a motion to suppress the evidence under CrR 3.6 and CrR 3.5. RP September 17, 2012. The court denied the motion. RP September 12, 2012 at 60-68. A jury found Ms. Whited guilty as charged. CP 4, 5.

Ms. Whited now appeals all portions of her Judgment and Sentence. CP 14-22

### **2. Trial Testimony.**

On June 8, 2012, Whitney Whited was the passenger in a red Toyota with Idaho plates. RP Trial Vol. I. 32-35. The driver and car's owner was her boyfriend of two years, Joseph Flock. Id. at 36, 101. They were on I-5 near Tumwater. Id. at 33. Another motorist contacted the State Patrol and reported having seen a man hitting the woman in a red Toyota. A trooper broadcasted the information about the assault and the vehicle description. Id. As it happened, Trooper Ryan Santhuff, had just

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<sup>1</sup> RCW 69.50.4013

<sup>2</sup> RCW 69.50.412

passed a car that matched the description.. Id. He slowed down to let the car get past him and fell in behind it once it did. Before he could signal the driver to pull over, the car pulled off to the shoulder. Trooper Santhuff followed the car. RP Trial Vol. I at 34. Trooper Jonathan Hazen followed Trooper Santhuff. Id. at 62. Uncharacteristically, another vehicle pulled in behind Trooper Hazen. The driver of that vehicle got out and told Trooper Hazen that the driver of the red Toyota had run him off the road. Id. at 63.

Because of the domestic violence allegation, Trooper Santhuff moved to separate Mr. Flock and Ms. Whited from each other right away. RP Trial Vol. 1 at 34, 63. Ms. Whited willingly stepped out of the car to talk to the troopers. Ms. Whited denied being struck by Mr. Flock. Instead, she told the trooper Mr. Flock pulled her hair. Id. at 35, 64.

Mr. Flock was told to stay in his car. However, Mr. Flock repeatedly ignored the direction and stepped out of the car. RP Trial Vol. I at 64. Mr. Flock was agitated. Both troopers had training in recognizing if a driver was under the influence of controlled substances to include stimulants. RP Trial Vol. I at 30-32, 60-62. Mr. Flock appeared to be under the influence. Id. at 37. Trooper Santhuff ran Mr. Flock through field sobriety tests. Although Mr. Flock did seem to be under the influence, he did not seem too impaired to drive. Id.

Mr. Flock admitted to past methamphetamine use and said there was a methamphetamine pipe in a sock in the driver's door. Trooper Santhuff ask for and received permission from Mr. Flock to search the car. Trooper Santhuff found the methamphetamine pipe in the door. RP Trial Vol. I at 38, 40. Trooper Santhuff asked Ms. Whited about her methamphetamine use. Id. at 39. She said she used methamphetamine in the past with Mr. Flock, she was not addicted to it, and that she hadn't used it for a few weeks. Id. She too gave Trooper Santhuff permission to search the car to include her personal belongs including a purse and some clothing. Id. at 39-40.

In addition to the methamphetamine pipe in the driver's door, the trooper located a broken meth pipe wrapped in a purple Crown Royal bag in the glove box, a syringe in the console, and two small baggies containing suspected methamphetamine from the car's ashtray. The trooper had to remove coins from the ashtray to find the baggies. The trooper also found syringes in a male-oriented toiletry bag back behind the driver's seat. RP Trial Vol. I at 40-41. The trooper did not find any methamphetamine or suspected drug paraphernalia in Ms. Whited's purse or her clothing. Id. at 52. Ms. Whited showed no signs of being under the influence of methamphetamine. Id. at 51. She had had a little to drink from an open bottle of Mike's Hard Lemonade in her purse. Id. at 41, 79.

Ms. Whited would later not recall telling Trooper Santhuff the methamphetamine was theirs (meaning hers and Mr. Flock's) yet Trooper Santhuff attributed that statement to her. RP Trial Vol. I at 48, 80. If Ms. Whited told the trooper it was theirs only because she was afraid of Mr. Flock. Id. at 91-96. Mr. Flock had also been physically abusive to Ms. Whited throughout their two year relationship. Id. at 94-96. There was a significant disparity in their ages. Mr. Flock was 36 years old. Miss Whited was just 20. Id. at 73, 100.

Rather than arresting Mr. Flock, the troopers let him drive away. RP Trial Vol. I at 97. Ms. Whited was arrested at the scene. Mr. Flock had told the troopers the methamphetamine belonged to Ms. Whited. Id. at 116.

Mr. Flock was later summoned into court on unspecified charges related to the traffic stop. Just days before Ms. Whited's trial, he pleaded guilty as charged and was sentenced. RP Trial Vol. I at 105-06.

Defense counsel called Mr. Flock as a witness at trial. Mr. Flock admitted lying to the troopers. RP Trial Vol. I at 100-19. The methamphetamine pipes and methamphetamine were his. He knew the pipes were in the car but he'd forgotten about the methamphetamine under the coins in the ashtray. Id. at 101-02. Although he and Ms. Whited had smoked methamphetamine together "a lot" during their relationship, she

had not used methamphetamine for several weeks. Id. at 108. He remembered telling a trooper that the meth in the pipe in the sock was his and the pipe in the Crown Royal bag belonged to Ms. Whited. However, he wanted to clarify that that was untrue. The pipes and the small baggies of methamphetamine belonged to him alone. Id. at 111-15. He had never seen Ms. Whited handle the pipes or the meth in the ashtray. Id. at 105. Mr. Flock also testified he and Ms. Whited had essentially been living in the car. Id. at 114.

Ms. Whited testified she did not know the methamphetamine pipes and methamphetamine were in the car. RP Trial Vol. I at 78.

Ms. Whited stipulated the pipes and contents of the baggies tested positive for methamphetamine and that the testing was done by a WSP forensic scientist. RP Trial Vol. I at 66-67.

There was no evidence that the pipes or baggies containing the methamphetamine were tested for fingerprints. RP Trial Vol. I at 96.

### **3. Jury Instructions and Closing Argument.**

Defense counsel did not propose any jury instructions and he did not object to the instructions proposed by the state and given by the court. RP Trial Vol. I at 142.

In closing argument, defense counsel argued Ms. Whited was not guilty because she did not know the methamphetamine baggies or the pipes were in the car thus she did not have actual or constructive possession of the pipes or the methamphetamine. RP Trial Vol. at 191-93. Also, because there was no proof Ms. Whited actually used the pipes, she was not guilty of use of drug paraphernalia. Id. The state argued Ms. Whited was in actual possession of the methamphetamine and the pipes because she told Trooper Santhuff it was “theirs” and, because she essentially lived in the car with Mr. Flock, she had constructive possession of all the car’s contents. Id. at 158-60, 170-71, 175-76.

#### **4. Sentencing.**

Ms. Whited had no criminal history. CP 7. The court imposed 30 days on the methamphetamine possession and converted the jail time to 240 hours of alternative community service. The court imposed 30 concurrent days on the paraphernalia charge. The court also ordered Ms. Whited to be on community custody for 12 months. RP Sentencing at 9-10. As a condition of community custody, the court ordered Ms. Whited to do the following:

[x] The defendant shall not use possess, manufacture, or deliver controlled substances without a valid prescription, *not associate with those who use, sell, possess, or manufacture controlled*

*substances* and submit to random urinalysis at the direction of his/her CCO<sup>3</sup> to monitor compliance with the condition.

CP 11 (emphasis added).

**D. ARGUMENT**

**1. MS. WHITED WAS DENIED HER RIGHT TO EFFECTIVE ASSISTANCE OF COUNSEL WHERE DEFENSE COUNSEL FAILED TO PROPOSE AN UNWITTING POSSESSION INSTRUCTION.**

Reversal of Ms. Whited's conviction for possession of methamphetamine is required because defense counsel failed to propose an unwitting possession jury instruction and Ms. Whited was prejudiced by the defense counsel's deficient performance.

- a. Ms. Whited is entitled to effective assistance of counsel.

Both the Sixth Amendment of the United States Constitution and Article I, Section 22 (Amendment 10) of the Washington State Constitution guarantees the right to effective assistance of counsel. *Strickland v. Washington*, 466 U.S. 668, 684-86, 104 S.Ct. 2052, 80 L.Ed.2d 674 (1984); *State v. Hendrickson*, 129 Wn.2d 61, 77, 917 P.2d 563 (1996); U.S. Const. Amend VI; Wash. Const. Art. I, Section 22. *See also, Powell v. Alabama*, 287 U.S. 45, 53 S.Ct. 55, 77 L.Ed. 158 (1932)

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<sup>3</sup> Community Corrections Officer

(the substance of this guarantee is to ensure that the accused is accorded a fair and impartial trial.).

To establish the claim of ineffective assistance, a defendant must show that under an objective standard of reasonableness counsel's performance was deficient and the deficient performance prejudiced the defense. *Strickland*, 466 U.S. at 687; *State v. S.M.*, 100 Wn. App. 401, 409, 996 P.2d 1111 (2000). The defendant need only show a reasonable probability the outcome would have differed sufficient to undermine confidence in the outcome in order to demonstrate prejudice. *Strickland*, 466 U.S. at 693-94. The defendant must make a showing as to both prongs and must also overcome a strong presumption that defense counsel's conduct was effective. *Strickland*, 466 U.S. at 687, 702; *State v. McFarland*, 127 Wn.2d 322, 335, 899 P.2d 1251 (1995). Legitimate trial strategy or tactics may not form the basis of an ineffective assistance of counsel claim. *McFarland*, 127 Wn.2d at 336.

Whether Ms. Whited was entitled to an unwitting possession instruction and whether it was unreasonable for defense counsel not to seek that instruction is reviewed de novo. If so, this Court must decide whether Ms. Whited was prejudiced. *See State v. Kruger*, 116 Wn. App. 685, 690-91, 694, 67 P.3d 1147 (2003). Failure to request an instruction on a potential defense can constitute ineffective assistance of counsel.

*State v. Thomas*, 109 Wn.2d 222, 229, 743 P.2d 816 (1987) (defense counsel ineffective for failing to propose a voluntary intoxication instruction to defeat willful and wanton mental element of eluding a pursuing police officer).

- b. Defense counsel's performance was deficient because an unwitting possession instruction should have been given had counsel requested it.

A defendant in a criminal case is “entitled to have the trial court instruct upon its theory of the case if there is evidence to support the theory.” *State v. Hughes*, 106 Wn.2d 176, 191, 721 P.2d 902 (1986). Unwitting possession is a well-established common law defense to a crime of possession. *State v. George*, 146 Wn. App. 906, 914-14, 193 P.3d 696 (2008). As a defense, it ameliorates the harshness of the possession of a controlled substance statute as possession is a strict liability crime. *State v. Bradshaw*, 152 Wn.2d 528, 538, 98 P.2d 1190 (2004), *cert. denied*, 544 U.S. 922 (2005).

A defendant is entitled to an unwitting possession instruction where the evidence presented at trial is sufficient to permit a reasonable juror to find, by a preponderance of the evidence, that the defendant's possession was unwitting. *State v. Buford*, 93 Wn. App. 149, 152-53, 967 P.2d 548 (1998). A trial court errs by not instructing the jury on the defense of unwitting possession when evidence supporting the defense is

adduced at trial. *State v. May*, 100 Wn. App. 478, 482–83, 997 P.2d 956 (2000).

Washington’s common law defense of unwitting possession is included in the pattern jury instructions in the section of special defense under the Uniform Controlled Substances Act:

#### WPIC 52.01 Unwitting Possession

A person is not guilty of possession of a controlled substance if the possession is unwitting. Possession of a controlled substance is unwitting if a person [did not know that the substance was in [his][her] possession] [or][did not know the nature of the substance].

The burden is on the defendant to prove by a preponderance of the evidence that the substance was possessed unwittingly. Preponderance of the evidence means that you must be persuaded, considering all of the evidence in the case, that it is more probably true than not true.

11 WAPRAC WPIC 52.01.

The unwitting possession instruction contrasts sharply with the definition of possession given to the jury in *Ms. Whited’s* case. The jury was instructed,

Possession means having a substance in one's custody or control. It may be either actual or constructive. Actual possession occurs when the item is in the actual physical custody of the person charged with possession. Constructive possession occurs when there is no actual physical possession but there is dominion and control over the substance.

Proximity alone without proof of dominion and control is insufficient to establish constructive possession. Dominion and

control need not be exclusive to support a finding of constructive possession.

In deciding whether the defendant had dominion and control over a substance, you are to consider all the relevant circumstances in the case. Factors that you may consider, among others, include whether the defendant had the immediate ability to take actual possession of the substance, whether the defendant had the capacity to exclude others from possession of the substance, and whether the defendant had dominion and control over the premises where the substance was located. No single one of these factors necessarily controls your decision.

Supplemental Designation of Clerk's Papers, Court's Instructions to the Jury, Instruction 10 (sub. nom. 41).

The jury heard testimony supporting both actual and constructive possession as well as unwitting possession.

As to actual or constructive possession, Trooper Santhuff testified Ms. Whited told him the methamphetamine was "theirs." RP Trial Vol. I at 48, 120. Originally, Mr. Flock said one of the methamphetamine pipes and the baggies of methamphetamine belonged to Ms. Whited. Id. at 111, 124-25. Mr. Flock testified that he and Ms. Whited essentially lived in the car establishing her dominion and control of the car and all its contents. Id. at 114.

However, a jury could have found the actual or construction possession argument did not apply because Ms. Whited's possession was unwitting. In his trial testimony, Mr. Flock claimed exclusive ownership

of the pipes and the methamphetamine. RP Trial Vol. I at 102-03. He'd never known Ms. Whited to handle it. Id. at 103. For her part, Ms. Whited did not recall telling Trooper Santhuff the methamphetamine was theirs. Id. at 91. If she told him that, it was only because she was scared of Mr. Flock. She had reason to be scared of him because he'd physically abused her throughout their two year relationship. Id. at 91-96. She had not used methamphetamine for about two weeks and she absolutely did not know the methamphetamine or the pipes were in the car. Id. at 78.

“In evaluating whether the evidence is sufficient to support a jury instruction on an affirmative defense, the court must interpret it most strongly in favor of the defendant and must not weigh the proof or judge the witnesses' credibility, which are exclusive functions of the jury.” *May*, 100 Wn. App. at 482. The affirmative defense of unwitting possession “must be considered in light of all the evidence presented at trial, without regard to which party presented it.” *George*, 146 Wn. App. at (quoting *State v. Olinger*, 130 Wn. App. 22, 26, 121 P.3d 724 (2005)).

Had the unwitting possession instruction been requested, it should have been given.

- c. It was objectively unreasonable for defense counsel to not request an unwitting possession instruction.

Defense counsel repeatedly argued before the jury during closing argument that Ms. Whited did not know the drugs were in the car and that it could not find that Ms. Whited had dominion and control over the drugs when she was not aware of their presence, yet defense counsel sought no instruction supporting that argument. There is no tactical reason why defense counsel did not seek an unwitting possession instruction because the defense's theory was primarily that Ms. Whited was not aware of the drugs and, in fact, unwitting possession was Ms. Whited's only real defense to constructive possession. Without an unwitting possession instruction, the defense could not properly argue its theory of the case. *See State v. Willis*, 153 Wn.2d 366, 370, 103 P.3d 1213 (2005) (jury instructions are proper when they, in part, permit the parties to argue their theories of the case). Under these circumstances, defense counsel's failure to request an unwitting possession instruction was not objectively reasonable.

- d. There is a reasonable probability that, but for defense counsel's deficient performance, the results at trial would have differed.

Here, the jury essentially had no choice but to find Ms. Whited in constructive possession of the car and its contents if they were to believe

she was essentially living in the car with Mr. Flock. Yet, they could have believed her trial testimony where she denied actual knowledge of the pipes or the methamphetamine. If the jury found her trial testimony truthful, the only prospect for acquittal was through the unwitting possession instruction.

e. Ms. Whited's possession of methamphetamine conviction should be reversed.

On these facts, it cannot be said to a reasonable degree of certainty that the outcome at trial would not have differed had the trial court instructed the jury on the defense of unwitting possession. Reversal is required because defense “failed to exercise the customary skills and diligence that a reasonably competent attorney would exercise under similar circumstances” and “there is a reasonable probability that, but for counsel’s errors, the result of the proceeding would have been different. *State v. Visitacion*, 55 Wn. App. 116, 173, 776 P.2d 986 (1989).

Ms. Whited has satisfied both prongs of *Strickland*. Her conviction should be reversed based on ineffective assistance of counsel and remanded for a new trial.

**2. THE CONDITION OF COMMUNITY CUSTODY FORBIDDING MS. WHITED FROM ASSOCIATING WITH PEOPLE WHO USE, SELL, POSSESS, OR MANUFACTURE CONTROLLED SUBSTANCES IS UNCONSTITUTIONALLY VAGUE.**

Prohibiting Ms. Whited from knowingly or unknowingly associating with persons who lawfully use, sell, possess, or manufacture a controlled substances sweeps much too broadly. It is an unconstitutionally vague condition of community custody. The condition criminalizes innocuous behavior and invites random and uneven enforcement by community corrections officers. It must be stricken.

- a. Ms. Whited must have fair notice of what conduct subjects her to violations of her community custody.

The due process clauses of the federal and state constitutions require that citizens be provided with fair warning of what conduct is illegal. U.S. Const. Amend. XIV; Const. Art. I, Section 3; *State v. Valencia*, 169 Wn.2d 782, 239 P.2d 1059 (2010); *State v. Bahl*, 164 Wn.2d 739, 752, 193 P.3d 678 (2008). As a result, a condition of community custody must be sufficiently definite that ordinary people understand what conduct is illegal and the condition must provide ascertainable standards to protect against arbitrary enforcement. *Bahl* at 752-52. A condition which leaves too much to the discretion of an

individual community corrections officer is unconstitutionally vague. *Valencia*, at 795.

- b. The vague condition fails to give Ms. Whited adequate notice of conduct that violates her community custody.

As a condition of community custody, the court ordered Ms. Whited to “not associate with those who use, sell, possess, or manufacture controlled substances.”<sup>4</sup> CP 20. This condition is similar to a condition found unconstitutionally vague in *Valencia*. *Valencia* was ordered not to possess or use “paraphernalia that can be used for the ingestion or processing of controlled substances” or used in the sale or transfer of controlled substances. *Valencia*, 169 Wn.2d at 785. The condition was so broad that it prohibited the possession of any “paraphernalia.” *Id.* at 784. Pointing out that sandwich bags, paper, and other commonplace items could be viewed as drug paraphernalia by some community corrections officers but not others, the court held the condition was void for vagueness. *Id.* at 794-95.

Ms. Whited’s community custody condition is equally as indefinable and vague as the one found unconstitutional in *Valencia*. The

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<sup>4</sup> RCW 9.94A.703 sets forth the conditions of community custody that may be imposed by the court. Among the discretionary conditions are “comply with any crime-related prohibitions,” RCW 9.94A.703(3)(f), and “refrain from contact with a specified class of individuals” RCW 9.94A.703(3)(b).

Uniform Controlled Substances Act defines controlled substances as “a drug, substance, or immediate precursor included in Schedules I through V as set forth in federal or state laws, or federal or board rules.” RCW 69.50.101(d). In total, Schedules I–V lists hundreds of controlled substances. Only Schedule I controlled substances have no accepted medical use in the United States and are regarded as having a “high potential for abuse.” RCW 69.50.203 and RCW 69.50.204. Otherwise, all the controlled substances listed in Schedules II, III, IV, and V, have recognized medical uses in the United States and are categorized on the individual Schedules based on the potential for abuse and the likelihood that use will result in a particular level of psychological or physical dependence. RCW 69.50.205; RCW 69.50.207; RCW 69.50.209; RCW 69.50.211.

Controlled substances are not inherently bad. Many controlled substances have legitimate medical uses.

- c. The vague community custody condition must be stricken.

Taken to its logical extreme, the community custody condition puts Ms. Whited at risk of violation if she associates with a person, who unbeknownst to her, uses a legitimate, medically prescribed controlled

substances for, say, an anxiety disorder,<sup>5</sup> seizures,<sup>6</sup> insomnia,<sup>7</sup> a cough,<sup>8</sup> diarrhea,<sup>9</sup> appetite suppression,<sup>10</sup> or pain related to cancer.<sup>11</sup> Given that Ms. Whited cannot associate with a person who sells controlled substances, she can't even visit a pharmacy to pick up a needed prescription for herself. The list is endless. The enforcement opportunities are endless too and completely random. The condition does nothing to honor the notice requirements of the state and federal constitutions. It should be stricken.

- d. Ms. Whited can object to the vague condition for the first time on appeal.

Although Ms. Whited did not object to this condition, illegal or erroneous sentences may be challenged for the first time on appeal. *Bahl*, 164 Wn.2d at 744; *State v. Ford*, 137 Wn.2d 472, 477, 973 P.2d 452 (1999).

## **E. CONCLUSION**

Ms. Whited's conviction for possession of methamphetamine should be reversed and remanded to the trial court. In the alternative, her case should be remanded to strike the community custody condition that is both unconstitutionally vague and not crime-related.

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<sup>5</sup> Diazepam, Schedule IV

<sup>6</sup> Clonazepam, Schedule IV

<sup>7</sup> Zaleplon, Schedule IV

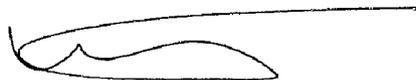
<sup>8</sup> Codeine, Schedule V

<sup>9</sup> Difenoxin, Schedule V

<sup>10</sup> Benzphetamine, Schedule III

<sup>11</sup> Fentanyl, Schedule III

Respectfully submitted this 7th day of June 2013.

A handwritten signature in black ink, appearing to read "Lisa E. Tabbut". The signature is written in a cursive style with a long horizontal stroke extending to the right.

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LISA E. TABBUT/WSBA #21344  
Attorney for Whitney Jean Whited

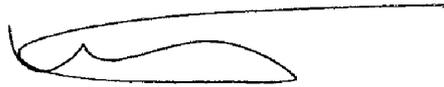
**CERTIFICATE OF SERVICE**

Lisa E. Tabbut declares as follows:

On today's date, I efiled Appellant's Brief with: (1) Carol La Verne, Thurston County Prosecutor's Office, at paoappeals@co.thurston.wa.us; and (2) the Court of Appeals, Division II; and (3) I mailed it to Whitney Jean Whited, c/o Valerie Whited, 414 6th Street SE, College Place, WA 99324.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed June 7, 2013, in Longview, Washington.



Lisa E. Tabbut, WSBA No. 21344  
Attorney for Whitney Jean Whited

# COWLITZ COUNTY ASSIGNED COUNSEL

**June 07, 2013 - 11:49 AM**

## Transmittal Letter

Document Uploaded: 441675-Appellant's Brief.pdf

Case Name: State v. Whiteny Jean Whited

Court of Appeals Case Number: 44167-5

**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

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Brief: Appellant'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

Petition for Review (PRV)

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### Comments:

No Comments were entered.

Sender Name: Lisa E Tabbut - Email: **[lisa.tabbut@comcast.net](mailto:lisa.tabbut@comcast.net)**

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