

NO. 45777-6-II

**IN THE COURT OF APPEALS OF THE STATE OF
WASHINGTON,**

DIVISION II

STATE OF WASHINGTON,

Respondent,

vs.

ANDREW HILTON SMITH,

Appellant.

RESPONDENT'S BRIEF

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I. STATE'S RESPONSE TO ASSIGNMENT OF ERROR

1. The trial court did not violate Smith's rights by allowing one of his hands to remain cuffed.
2. Smith's counsel was effective.
3. The Failure to Register as a Sex Offender statute is not unconstitutional.
4. The Washington State Constitution does not require a jury trial in a felony case.
5. The trial court properly calculated Smith's offender score.
6. The trial court did not err by requiring Smith to pay certain legal financial obligations.

II. STATEMENT OF THE CASE

A. Procedural History.

On August 2, 2013, Andrew Smith was charged by information with Failure to Register as a Sex Offender, RCW 9A.44.130(1), 4(a), 4(b), 5(a), 5(b) and RCW 9A.44.132(1)(b). CP 1-2. On November 26, 2013, Smith's counsel filed a Waiver of Jury Trial. RP 1-2, CP 15. On December 5, 2013, Smith was convicted as charged at a bench trial. RP 3-124. Smith was sentenced on December 19, 2013, and the Felony Judgment and sentence was entered. RP 125-132, CP 19.

B. Factual History

The State does not contest the “Statement of Facts and Prior Proceedings” as presented by the Smith; however, it makes the following additions. At the sentencing hearing on December 19, 2013, the State outlined Smith’s standard range of 22-29 months and the fact that the State understood that Smith was stipulating to his criminal history. RP 125. After the State gave its sentencing recommendation, Smith’s counsel stated “Mr. Smith does stipulate to those prior convictions.” RP 126. Later in his argument Smith’s counsel stated “[h]is range is 22-29 months.” RP 129.

III. ARGUMENT

A. THE TRIAL COURT DID NOT VIOLATE SMITH’S RIGHTS BY ALLOWING ONE OF HIS HANDS TO REMAIN CUFFED.

Because Smith cannot show that his cuffed hand had a substantial effect on the trial judge, reversal is not merited. “A criminal defendant is ‘entitled to appear at trial free from all bonds or shackles except in extraordinary circumstances.’” *State v. E.J.Y.*, 113 Wn. App. 940, 951, 55 P.3d 673 (2002) citing *State v. Turner*, 143 Wn.2d 715, 725, 23 P.3d 499 (2001) (quoting *State v. Finch*, 137 Wash.2d 792, 842, 975 P.2d 967 (1999)). “Restraints are viewed with disfavor because they may abridge

important constitutional rights....” *State v. Hartzog*, 96 Wn.2d 383, 398, 635 P.2d 694 (1981). In cases involving potential misconduct by a criminal defendant, the “trial judge must exercise discretion in determining the extent to which courtroom security measures are necessary to maintain order and prevent injury. That discretion must be founded upon a factual basis set forth in the record.” *Hartzog*, 96 Wn.2d at 400, 635 P.2d 694. *Hartzog* lists several factors to be considered when determining if a defendant should be restrained during trial:

“[T]he seriousness of the present charge against the defendant; defendant’s temperament and character; his age and physical attributes; his past record; past escapes or attempted escapes, and evidence of a present plan to escape; threats to harm others or cause a disturbance; self-destructive tendencies; the risk of mob violence or of attempted revenge by others; the possibility of rescue by other offenders still at large; the size and mood of the audience; the nature and physical security of the courtroom; and the adequacy and availability of alternative remedies.”

State v. Hutchinson, 135 Wn.2d 863, 887-888, 959 P.2d 1061 (1998), *cert. denied*, 525 U.S. 1157, 119 S.Ct. 1065, 143 L.Ed.2d 69 (1999) citing *State v. Hartzog*, 96 Wn.2d 383, 400, 635 P.2d 694 (1981).

“A claim of unconstitutional shackling is subject to harmless error analysis. In order to succeed on his claim, the Defendant must show the shackling had a substantial or injurious effect or influence on the jury’s

verdict. Because the jury never saw the Defendant in shackles, he cannot show prejudice.” *Id.* at 888 citing *Rhoden v. Rowland*, 10 F.3d 1457, 1459–60 (9th Cir.1993).

The absence of a showing of a factual basis on the record does not require reversal unless it is shown that the use of restraints substantially affected the trial court's fact finding. *State v. Hutchinson*, 135 Wn.2d 863, 888, 959 P.2d 1061 (1998), *cert. denied*, 525 U.S. 1157, 119 S.Ct. 1065, 143 L.Ed.2d 69 (1999).

In *State v. E.J.Y.*, the defendant was charged with felony harassment and was tried before a judge. At trial, E.J.Y.'s attorney notified the court that E.J.Y. was being restrained by both leg and arm shackles. *State v. E.J.Y.*, 113 Wn. App. 940, 944, 55 P.3d 673 (2002). The trial judge then asked two detention officers, in unsworn testimony, to explain the reason E.J.Y. had been brought to court in shackles. They explained to the court that an incident had occurred approximately three weeks earlier when E.J.Y. had bitten a staff person and attempted to escape out of a car. *Id.* at 945.

The trial judge explained that she could not substitute her judgment for that of the security officer and ordered removal of the leg restraints but not the arm restraints, and expressly informed defense counsel that if needed, extra time would be provided for attorney-client communication.

Id. In *E.J.Y.*, the State conceded that the required showing on the record was not made, but the court held “this error does not require reversal unless it is shown that the use of restraints substantially affected the trial court's fact finding.” *Id.* at 952. No such showing was made. Furthermore, “[t]his was a proceeding without a jury, which greatly reduces the likelihood of prejudice. We conclude that the error was harmless.” *Id.*

In his Opening Brief, Smith alleges that he was restrained by a leg brace at trial. Appellant’s Opening Brief at 8. The record does not reflect the use of a leg brace. The only type of restraint mentioned are handcuffs. RP 5. In this case trial counsel noted the fact that Mr. Smith was cuffed and requested the handcuffs be removed so he could take notes. The judge inquired with the Department of Corrections officer if he was comfortable removing the cuffs. The Officer responded that he could remove one hand. The judge asked if Mr. Smith was right or left handed and the Officer removed the cuff on Mr. Smith’s right hand. RP 5-6. Although the *Hartzog* factors were not stated on the record, Mr. Smith has not shown that the use of restraints substantially affected “a jury’s verdict” or the trial court’s fact finding. *See State v. Hutchinson*, 135 Wn.2d 863, 887-888, 959 P.2d 1061 (1998). Because Smith’s trial proceeded without a jury the likelihood of prejudice was greatly reduced and the error is harmless.

B. SMITH'S COUNSEL WAS EFFECTIVE

Both the Federal and Washington State Constitutions provide the right to assistance of counsel. *See State v. Jury*, 19 Wn. App. 256, 262, 576 P.2d 1302, 1306 (1978); *see also* U.S. CONST. AMEND. VI, WASH. CONST. ART. 1, § 22. “[T]he substance of this guarantee is that courts must make ‘effective’ appointments of counsel.” *Jury*, 19 Wn. App. at 262, 576 P.2d at 1306 quoting *Powell v. Alabama*, 287 U.S. 45, 53 S.Ct. 55, 77 L.Ed. 158 (1932). In *Strickland v. Washington*, the United States Supreme Court set forth the prevailing standard under the Sixth Amendment for reversal of criminal convictions based on ineffective assistance of counsel. 466 U.S. 668, 104 S.Ct. 2052, 80 L.Ed.2d 674. Under *Strickland*, ineffective assistance is a two-pronged inquiry:

“First, the defendant must show that counsel's performance was deficient. This requires showing that counsel made errors so serious that counsel was not functioning as the ‘counsel’ guaranteed the defendant by the Sixth Amendment. Second, the defendant must show that the deficient performance prejudiced the defense. This requires showing that counsel's errors were so serious as to deprive the defendant of a fair trial, a trial whose result is reliable. Unless a defendant makes both showings, it cannot be said that the conviction ... resulted from a breakdown in the adversary process that renders the result unreliable.”

State v. Grier, 171 Wn.2d 17, 33 246 P.3d 1260 (2011). (quoting *Strickland*, 466 U.S. at 687, 104 S.Ct. 2052); see also *State v. Cienfuegos*, 144 Wn.2d 222, 226, 25 P.3d 1011 (2001) (“Washington has adopted the *Strickland* test to determine whether a defendant had constitutionally sufficient representation.”). To satisfy the prejudice prong of the *Strickland* test, the defendant must establish that “there is a reasonable probability that, but for counsel's deficient performance, the outcome of the proceedings would have been different.” *State v. Kylo*, 166 Wn.2d 856, 862, 215 P.3d 177 (2009). “A reasonable probability is a probability sufficient to undermine confidence in the outcome.” *Strickland*, 466 U.S. at 694, 104 S.Ct. 2052; *Thomas*, 109 Wn.2d at 226, 743 P.2d 816; *Garrett*, 124 Wn.2d at 519, 881 P.2d 185. In assessing prejudice, “a court should presume, absent challenge to the judgment on grounds of evidentiary insufficiency, that the judge or jury acted according to the law” and must “exclude the possibility of arbitrariness, whimsy, caprice, ‘nullification’ and the like.” *Strickland*, 466 U.S. at 694–95, 104 S.Ct. 2052.

Ineffective assistance of counsel is a fact-based determination that is “generally not amenable to per se rules.” *State v. Grier*, 171 Wn.2d at 33, citing *Cienfuegos*, 144 Wn.2d at 229, 25 P.3d 1011; *Strickland*, 466 U.S. at 696, 104 S.Ct. 2052 (“Most important, in adjudicating a claim of

actual ineffectiveness of counsel, a court should keep in mind that the principles we have stated do not establish mechanical rules. Although those principles should guide the process of decision, the ultimate focus of the inquiry must be on the fundamental fairness of the proceeding whose result is being challenged.”). Further, “[a] fair assessment of attorney performance requires that every effort be made to eliminate the distorting effects of hindsight, to reconstruct the circumstances of counsel’s challenged conduct, and to evaluate the conduct from counsel’s perspective at the time.” *State v. Grier*, 171 Wn.2d at 33 citing *Strickland*, 466 U.S. at 689, 104 S.Ct. 2052. Here there has been no showing that the handcuffs effected the trial judge’s ruling. Judges watch defendants enter the courtroom cuffed every day and there has been no showing that a judge seeing a defendant wearing a cuff would influence their decision in any way. Second, there has been no showing counsel’s performance was deficient, and that but for the deficiency, the outcome would have been different. In fact, all that can be gleaned from the record is that the Judge allowed Smith to write notes to assist in his defense. RP 5-6. Without a showing a deficiency, Smith’s argument fails.

C. THE FAILURE TO REGISTER AS A SEX OFFENDER STATUTE IS NOT UNCONSTITUTIONAL

The constitutionality of a statute is reviewed de novo. *City of Spokane v. Neff*, 152 Wn.2d 85, 88, 93 P.3d 158 (2004). A reviewing court “will presume that a statute is constitutional and it will make every presumption in favor of constitutionality where the statute's purpose is to promote safety and welfare, and the statute bears a reasonable and substantial relationship to that purpose.” *State v. Glas*, 147 Wn.2d 410, 422, 54 P.3d 147 (2002); *State v. Lee*, 135 Wn.2d 369, 390, 957 P.2d 741 (1998). “If possible, a statute must be interpreted in a manner that upholds its constitutionality.” *State v. Halstein*, 122 Wn.2d 109, 123, 857 P.2d 270 (1993) (*following Tacoma v. Luvene*, 118 Wn.2d 826, 841, 827 P.2d 1374 (1992), *State v. Dixon*, 78 Wn.2d 796, 804, 479 P.2d 931 (1971)).

“A statute is overbroad if it sweeps constitutionally protected free speech within its prohibitions and there is no way to sever its unconstitutional applications.” *Lee*, 135 Wn.2d at 387 (*following State v. Talley*, 122 Wn.2d 192, 210, 858 P.2d 117 (1993), *City of Seattle v. Huff*, 111 Wn.2d 923, 925, 767 P.2d 572 (1989)). Where a court finds that a statute is unconstitutional “as applied,” the statute cannot be applied again under similar circumstances. *City of Redmond v. Moore*, 151 Wn.2d 664, 669, 91 P.3d 875 (2004). If a court finds a statute facially

unconstitutional, the statute must be struck down. *Id.* However, if there are circumstances in which a statute can be constitutionally applied, a facial challenge must be rejected. *Id.*

If a fundamental right is at issue, the State must have a compelling interest to justify the statute that limits this right. *State v. Schimelpfenig*, 128 Wn. App. 224, 226, 115 P.3d 338 (2005). The right to travel is a fundamental right and subject to strict scrutiny. *Kent v. Dulles*, 357 U.S. 116, 78 S.Ct. 1113, 2 L.3d.2d 1204 (1958); *City of Seattle v. McConahy*, 86 Wn. App. 557, 571, 937 P.2d 1113, *review denied*, 113 Wn.2d 1018, 948 P.2d 338 (1997). “A state law implicates the right to travel when it *actually* deters such travel and where impeding travel *is its primary objective.*” *State v. Enquist*, 163 Wn. App. 41, 256 P.3d 1277 (2011), *review denied*, 173 Wn.2d 1008 (2012) (*emphasis added*).

In the present matter, Smith’s contention that RCW 9A.44.130 is unconstitutionally overbroad is without merit. Smith cannot demonstrate beyond a reasonable doubt that RCW 9A.44.130 is facially invalid or unconstitutional “as applied.” First, despite Smith’s argument, and as previously recognized by the courts, the State does have a compelling interest that justifies the statute. “The statute was enacted to ‘assist local law enforcement agencies’ efforts to protect their communities by regulating sex offenders.” *Enquist*, 163 Wn. App. at 51 (*quoting* Laws of

1990 ch. 3, § 401). “Impeding travel *has never* been RCW 9A.44.130’s primary goal.” *Id.* (*emphasis added*).

Furthermore, the failure to register as a sex offender statute does not contain any provisions that intend the impediment or restriction of travel. Likewise, the statute does not actually prevent Smith from traveling. Smith is not prohibited from moving his residence, nor is he prohibited from moving to a different city, county, or state. “The statute...permits a registrant to travel or move out of the state for work or educational purposes, if he...timely registers with the new state and notifies the sheriff of the last Washington county in which he registered.” *Id.*

Smith claims that he cannot be away from his primary residence for more than three days. *Petitioner’s Brief* at 8. This is an unfounded legal conclusion contrary to the prevailing case law. “A residence ‘is the place where a person lives as either a temporary or permanent dwelling, a place to which one intends to return, as distinguished from a place of temporary sojourn or transient visit.’” *State v. Pickett*, 95 Wn. App. 475, 478, 975 P.2d 584 (1999). Smith can maintain a residence *and* travel to another location. For example, under the above definition of “residence,” Smith could travel to Spokane for four weeks as long as he intends on returning to his residence. He is not required to re-register when he goes

on vacation. He has no duty to notify law enforcement when he travels. RCW 9A.44.130 requires him to register only when he changes his primary residence or ceases to have a fixed residence. Smith fails to provide any evidence that RCW 9A.44.130 restricts his ability to travel.

D. THE WASHINGTON STATE CONSTITUTION DOES NOT REQUIRE A JURY TRIAL IN A FELONY CASE.

Smith argues at length that the Washington State Constitution, art. I, sec. 21 and 22, prohibits a criminal defendant from waiving his right to a jury trial in a felony case. This argument, though novel, fails in light of the controlling case-law. The Washington Supreme Court has repeatedly recognized that criminal defendants may waive their right to a jury trial. *State v. Stegall*, 124 Wn.2d 719, 723, 881 P.2d 979 (1994); *State v. Forza*, 70 Wn.2d 69, 70-71, 422 P.2d 475 (1966); *State v. Lane*, 40 Wn.2d 734, 737, 246 P.2d 474 (1952). Additionally, this Court has recently rejected this exact argument in *State v. Benitez*, 175 Wn. App. 116, 302 P.3d 877 (2013). The *Benitez* ruling definitively dismisses the theory that the Washington Constitution bars a criminal defendant from waiving the right to a jury trial. 175 Wn. App. at 126-127. This Court should reject this argument once again.¹

¹ The appellate attorney's argument also attempts to usurp the authority of her client, who clearly did not wish to proceed to trial before a jury. The authority of an appellate attorney to attempt to override her client's decision is highly questionable.

1. Smith Properly Waived his Right to a Jury Trial.

Smith next argues that he did not validly waive the right to a jury trial because his waiver was ineffective. Appellant's Opening Brief at 33. However, Smith's argument is contradicted by the controlling case-law and the facts of this case, and should be denied by this Court.

On appeal, the record must adequately establish that a defendant's waiver of the right to a jury trial was made knowingly, intelligently, and voluntarily. *State v. Pierce*, 134 Wn. App. 763, 771, 142 P.3d 610 (2006). A written waiver is "strong evidence that the defendant validly waived the jury trial right." *Pierce*, 134 Wn. App. at 771; *State v. Downs*, 36 Wn. App. 143, 145, 672 P.2d 416 (1983). Additionally, an extensive colloquy is not required, simply "a personal expression of waiver from the defendant." *Pierce*, 134 Wn. App. at 771; *Stegall*, 124 Wn.2d at 725. Thus, the right to a jury trial may be waived more easily than other rights. *Benitez*, 175 Wn. App. at 129; *Pierce*, 134 Wn. App. at 772; see also *State v. Brand*, 55 Wn. App. 780, 786, 780 P.2d 894 (1989).

Here, Smith entered a written waiver of his right to a jury trial. CP 15. Smith verified to the court that he desired to waive jury and proceed with a trial to the bench. RP 1-2. Smith's argument that he must also have been apprised of the right to a fair and impartial jury and the right to the presumption of innocence fails, as these rights are inherent in all trials

whether the finder of fact is a judge or jury. *Benitez*, 175 Wn. App. at 129; *Pierce*, 134 Wn. App. at 772; see also *State v. Orange*, 78 Wn.2d 571, 573, 479 P.2d 220 (1970). Furthermore, the waiver actually entered by Smith in fact specifies that he has the right to “an impartial jury” and that “in a jury trial, the State must convince all twelve citizens of my guilt beyond a reasonable doubt.” CP 15. Therefore, Smith’s argument that the jury waiver was invalid is ill-taken, and should be rejected by this Court.²

E. THE TRIAL COURT PROPERLY CALCULATED SMITH’S OFFENDER SCORE.

Smith’s counsel stipulated to his criminal history and acknowledge his sentencing range, therefore his claim that it was improperly calculated fails. “[I]n general a defendant cannot waive a challenge to a miscalculated offender score.” *In re Goodwin*, 146 Wn.2d 861, 874, 50 P.3d 618 (2002). “There are limitations on this holding... waiver can be found where the alleged error involves an agreement to facts, later disputed, or where the alleged error involves a matter of trial court discretion.” *Id.* at 874. Further, “[t]he court is not bound by an erroneous concession related to a matter of law. *Id.* citing *State v. Knighten*, 109 Wn.2d 896, 902, 748 P.2d 1118 (1988).

² Smith demands that *Pierce* be overruled is similarly without merit, and has also been decided by this Court already in *Benitez*, 175 Wn. App. at 127-129.

A waiver of a possible miscalculation of an offender score is found in *State v. Niche*. 100 Wn. App. 512, 997 P.2d 1000, *review denied*, 141 Wn.2d 1030, 11 P.3d 827 (2000). In *Niche*, the defendant argued for the first time on appeal that the two crimes he was convicted of constituted the same criminal conduct, and therefore his offender score was incorrect. *Id.* at 523. However, Niche had agreed, “in his own presentence memorandum that his offender score had been properly calculated.” *Id.* The court held that the defendant’s “failure to identify a factual dispute for the court’s resolution and ... failure to request an exercise of the court’s discretion” waived the challenge to his offender score. *In re Goodwin*, 146 Wn.2d 861, 875, 50 P.3d 618 (2002) *citing Niche* at 520, 997 P.2d 1000. *Id.* at 875.

In *State v. Ross*, the Washington Supreme court held that when two defendant’s attorneys expressly acknowledged that criminal history include an out of state conviction and federal convictions, the convictions were properly included in the offender scores. 152 Wn.2d 220, 230, 95 P.3d 1225 (2004). “To invoke the waiver analysis set forth in *Goodwin*, a defendant *must* first show on appeal . . . that an error of fact or law exists within the four corners of his judgment and sentence.” *Id.* at 231. Smith’s claim of error, like the claims in *Ross*, are not to be found within the four corners of the judgment and sentence.

At sentencing, Smith's counsel stipulated to his criminal history. RP 126. He also agreed to the calculation by which his offender score was reached by acknowledging that the range was 22-29 months. RP 129. In addition to agreeing to his offender score at sentencing, Smith and his attorney signed off on the Judgment and Sentence in which Mr. Smith's criminal history was listed. CP 19. The criminal history listed on the signed Felony Judgment and Sentence lists Attempted Sex Abuse in the First Degree, Failure to Register as a Sex Offender, Assault in the Third Degree and Attempted VUCSA Possession Methamphetamine. The Judgment also states that Smith was on community custody at the time of the current offense. CP 19. The offender score is listed as seven.

Smith's argument that an out of state conviction is not comparable to a Washington statute fails to show that an error of fact or law exists within the four corners of his judgment and sentence. Consequently, Mr. Smith has failed to meet the initial threshold requirement to invoke *Goodwin* and, thus, he has waived his ability to challenge his offender score. Finally, RCW 9.94A.530(2) (formerly RCW 9.94A.370) provides "[i]n determining any sentence, the trial court may rely on no more information than is admitted by the plea agreement, or admitted, acknowledged, or proved in a trial or at the time of sentencing." For these reasons Smith's offender score was properly calculated.

F. THE TRIAL COURT DID NOT ERR BY REQUIRING SMITH TO PAY CERTAIN LEGAL FINANCIAL OBLIGATIONS

Smith also asks this Court to either terminate his legal financial obligations (LFOs) or remand for a hearing on his ability to pay. The appellant cites to *State v. Bertrand*, 165 Wn. App. 393, 267 P.3d 511 (2011), to support his position. However, Smith did not object to the imposition of the LFOs at trial.

In *Bertrand*, this Court addressed an argument that the trial court erred by finding the defendant had the present or future ability to pay LFOs. 165 Wn. App. at 404. Notably, the defendant in *Bertrand* was indisputably disabled. *Id.* Subsequently, this Court has noted that a defendant's failure to object to a finding of ability to pay will result in a bar on the issue being raised for the first time on appeal. RAP 2.5(a); *State v. Blazina*, 174 Wn. App. 906, 301 P.3d 492 (2013). As Smith did not object to the imposition of the LFOs, this Court should decline to consider the issue.

Further, contrary to Smith's assertion, "the sentencing court's consideration of the defendant's ability to pay is not constitutionally required." *State v. Calvin*, 316 P.3d 496 (2013) citing *State v. Blank*, 131 Wn.2d 230, 241-42, 930 P.2d 1213 (1997) ("the Constitution does not require an inquiry into ability to pay at the time of sentencing"). The issue

raised by Smith is not one of constitutional magnitude that can be raised for the first time on appeal under RAP 2.5(a).

Finally, there is no evidence that the State has yet attempted to enforce the trial court's LFO order and collect from the appellant. Thus, his challenge is not yet ripe and is not properly before this Court. *State v. Lundy*, 176 Wn. App. 96, 308 P.3d 755 (2013).

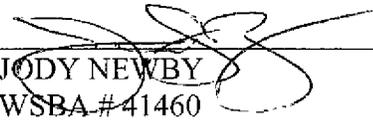
IV. CONCLUSION

For the above stated reasons, the conviction should be affirmed.

Respectfully submitted this 6 day of October, 2014.

SUSAN I. BAUR
Prosecuting Attorney

By:



JODY NEWBY
WSBA # 41460
Deputy Prosecuting Attorney
Representing Respondent

Appendix A

RAP 2.5 Circumstances Which May Affect Scope of Review

(a) Errors Raised for First Time on Review. The appellate court may refuse to review any claim of error which was not raised in the trial court. However, a party may raise the following claimed errors for the first time in the appellate court: (1) lack of trial court jurisdiction, (2) failure to establish facts upon which relief can be granted, and (3) manifest error affecting a constitutional right. A party or the court may raise at any time the question of appellate court jurisdiction. A party may present a ground for affirming a trial court decision which was not presented to the trial court if the record has been sufficiently developed to fairly consider the ground. A party may raise a claim of error which was not raised by the party in the trial court if another party on the same side of the case has raised the claim of error in the trial court.

CERTIFICATE OF SERVICE

Michelle Sasser, certifies that opposing counsel was served electronically via the Division II portal:

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

Signed at Kelso, Washington on October 6th, 2014.

Michelle Sasser
Michelle Sasser

COWLITZ COUNTY PROSECUTOR

October 06, 2014 - 1:12 PM

Transmittal Letter

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