

NO. 46035-1

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

STATE OF WASHINGTON, RESPONDENT

v.

JACQUELINE RAY, APPELLANT

Appeal from the Superior Court of Pierce County
The Honorable Stanley Rumbaugh

No. 12-1-03041-5

BRIEF OF RESPONDENT

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

1. Whether Defendant's plea agreement, the Sentencing Reform Act of 1981, and lack of sufficient argument or citation to the record precludes review of Defendant's challenge to her standard range sentence?

2. Whether Defendant's challenge to her standard range sentence fails on its merits where the court was required to consider the information Defendant complains of on appeal and where there is no evidence of the sentencing judge's actual or potential bias?

B. STATEMENT OF THE CASE.

1. Procedure

On August 13, 2012, the State filed an information charging Jacqueline Ray (Defendant) with premeditated murder in the first degree (Count I), and felony murder based upon a first or second degree kidnapping predicate (Count II). CP 1-2. Each count alleged that Defendant, or an accomplice, was armed with a firearm in the commission of the crime. CP 1-2.

On October 16, 2013, Defendant entered a plea agreement with the State which required her to testify truthfully at the trials of any co-defendants. CP 18–21. In exchange, the State filed an Amended Information charging Defendant with one count of first degree felony murder with an assault predicate, and also alleged that Defendant or an accomplice was armed with a firearm. CP 17. Significantly, the State agreed that if Defendant adequately performed her obligations pursuant to the plea agreement, it would file a second Amended Information charging Defendant with second degree murder.¹ 1 RP 4–5²; CP 18–21.

On January 10, 2014, the State filed a second Amended Information, charging Defendant with second degree murder and alleging that Defendant or an accomplice was armed with a firearm. CP 31. Defendant pleaded guilty to this charge. CP 32–41.

On February 21, 2014, the Honorable Stanley J. Rumbaugh sentenced Defendant to a mid range sentence of 160 months confinement.³ 2 RP 41; CP 171–86. Defendant also received a 60 month firearm sentencing enhancement, bringing her total term of confinement to 220 months within the total standard range (including enhancements) of 183–280 months. 2 RP 41; CP 171–86.

¹ This would vacate the original October 16, 2013, plea agreement. 1 RP 4–5.

² The verbatim report of proceedings contains two non-sequentially paginated volumes of transcripts. The State will refer to proceedings on the January 10, 2014, volume as "1 RP" and proceedings on the February 21, 2014 volume as "2 RP."

³ The standard range was 123–230 months. CP 171–86. Defendant's Judgment and Sentence was designated as part of the "Notice of Appeal" (CP 171–86).

Defendant filed her timely notice of appeal on March 24, 2014.
CP 171–86.

2. Facts⁴

On July 12, 2012, a man and woman were walking their dog in unincorporated Pierce County, near Gig Harbor, when they noticed a dead body about 10 feet off the roadway. CP 44–71 (page 11). The body, less than one mile from Defendant's house, was identified as Defendant's son-in-law, Mr. Leon Baucham. CP 44–71 (page 11).

Detectives learned that Mr. Baucham had allegedly assaulted his wife Umeko, who is Defendant's daughter, on May 30, 2012. CP 44–71 (page 12). Mr. Baucham believed that Umeko was having an affair with a co-worker. CP 44–71 (page 12).

In response to the alleged assault, Defendant contacted Luis Barker, a recently released convict who was said to have served time for "gun running." CP 44–71 (page 17); CP 72–86 (Defendant's Sentencing Memorandum, page 7). Luis agreed to "take care of" Mr. Baucham for the sum of \$12,000. 1 RP 12; CP 32–41 (page 9); CP 44–71 (pages 11–18); CP 72–86 (page 7).

⁴ Because Defendant pleaded guilty, the fact-finding process was limited. Of the information that *was* presented to the sentencing court, Defendant did not object to any of it.

On July 11, 2012, Defendant called Mr. Baucham and invited him to her house, promising that Mr. Baucham's wife was there to speak with him. CP 72–86 (page 7). Defendant then notified Luis, who arrived at Defendant's house with another man approximately 30 minutes prior to Mr. Baucham's arrival. CP 3–5.

Defendant opened her front door and welcomed Mr. Baucham inside. CP 3–5. Luis shot Mr. Baucham and then drove him to a nearby field, where he ultimately passed away. CP 3–5; CP 44–1 (pages 14–15, 17).

C. ARGUMENT.

1. DEFENDANT'S PLEA AGREEMENT, THE SENTENCING REFORM ACT OF 1981, AND LACK OF SUFFICIENT ARGUMENT OR CITATION TO THE RECORD PRECLUDES REVIEW OF DEFENDANT'S CHALLENGE TO HER STANDARD RANGE SENTENCE.

- i. Defendant waived any right to appeal her standard range sentence as part of her plea agreement with the State.

It is a well-settled rule that "a plea of guilty waives the right to appeal from a finding of guilt and the sentence based on that finding of guilt." *State v. Gaut*, 111 Wn. App. 875, 46 P.3d 832 (2002) *citing State v. Majors*, 94 Wn.2d 354, 355, 616 P.2d 1237 (1980).

Here, in exchange for avoiding a first degree murder charge, Defendant expressly waived any right to appeal a standard range sentence.

CP 18–21; CP 32–41. To Defendant's benefit, her standard range went from 240-320 months (under Murder 1) to 123–220 months (under Murder 2). RCW 9.94A.510, 9.94A.515. Defendant paid Luis Barker \$12,000 to kill Mr. Baucham. 1 RP 11–12; CP 32–41 (page 9); CP 44–71 (pages 11–18); CP 72–86 (page 7). This conduct qualifies Defendant for aggravated first degree murder pursuant to RCW 10.95.020, in which case Defendant's standard range sentence would have been life without parole or the death penalty. RCW 9.94A.510, RCW 9.94A.515. Defendant received a significant benefit in being sentenced within the standard range of 123–230 months confinement. In return, Defendant agreed that "**I understand that if a standard range sentence is imposed upon an agreed offender score, the sentence cannot be appealed by anyone.**"⁵ CP 32–41 (page 5, section 6(h)) (emphasis added).

Now, after receiving her benefit under the bargain, Defendant asks this Court to ignore her obligations and consider an appeal to a standard range sentence. This violates the terms of the plea agreement. Defendant expressly waived her right to appeal any standard range sentence as part of the plea agreement she entered into with the State, and this Court should not relieve her of her obligations.

⁵ The court also verbally informed Defendant that she would be giving up "some important rights to appeal." 1 RP 9–10.

ii. The Sentencing Reform Act bars Defendant's appeal of her standard range sentence.

"The Sentencing Reform Act of 1981 states clearly that a 'sentence within the standard sentence range [...] *shall not be appealed.*'" *State v. Mail*, 121 Wn.2d 707, 710, 854 P.2d 1042 (1993) (emphasis added); RCW 9.94A.585. "By [...] precluding appeals regarding the length of a standard range sentence, the Legislature sought to ensure that punishment for each criminal offense would be commensurate with that imposed on others with similar criminal histories committing a similar offense." *State v. Garcia-Martinez*, 88 Wn. App. 322, 328, 944 P.2d 1104 (1997). "To permit the appellate courts to second-guess that decision would destroy the uniformity the Legislature sought to achieve." *Id.* at 328. "So long as the sentence falls within the proper presumptive sentencing ranges set by the legislature, there can be no abuse of discretion as a matter of law as to the sentence's length." *State v. Williams*, 149 Wn.2d 143, 146-47, 65 P.3d 1214, 1215 (2003).

Our courts have delineated two limited contexts in which a standard range sentence *may* be appealed: (1) if the sentence "fails to comply with the procedural requirements of the Sentencing Reform Act (SRA)"; or (2) if the sentence "raises a constitutional issue." *State v. Osman*, 126 Wn. App. 575, 589, 108 P.3d 1287 (2005); *see also State v. McNair*, 88 Wn. App. 331, 336, 944 P.2d 1099 (1997).

Defendant does not raise either exception to the SRA's bar on appealing standard range sentences. Allowing her to appeal her standard range sentence violates the express language of RCW 9.94A.585.

- iii. This court should not accept review under RAP 2.5(a) because Defendant fails to support her claims with sufficient argument to demonstrate that the trial court committed a manifest error affecting a constitutional right.

Defendant expressly relies on RAP 2.5(a) to argue that the trial court committed a manifest error affecting a constitutional right. This reliance is misplaced.

Defendant alleges two constitutional violations so manifest that each purportedly triggers judicial review pursuant to RAP 2.5(a). The first, that the trial court allegedly "violate[d] the real facts doctrine because it heard and considered facts probative of a more serious crime during the sentencing hearing[.]" is not supported with sufficient argument to merit judicial consideration. (Br.App. at 10).

The real facts doctrine is based on RCW 9.94A.530(2), which provides as follows:

In determining any sentence other than a sentence above the standard range, 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, or proven pursuant to RCW 9.94A.537. Acknowledgment includes not objecting to information stated in the presentence reports and not objecting to criminal history presented at the time of sentencing. Where

the defendant disputes material facts, the court must either not consider the fact or grant an evidentiary hearing on the point. The facts shall be deemed proved at the hearing by a preponderance of the evidence, except as otherwise specified in RCW 9.94A.537.

"The real facts doctrine only bars reliance on those facts wholly unrelated to the current offense or those facts which would elevate the degree of the crime charged to a greater offense than charged." *State v. Reynolds*, 80 Wn. App. 851, 857, 912 P.2d 494, quoting *State v. Tierney*, 74 Wn. App. 346, 352, 872 P.2d 1145 (1995).

Here, Defendant fails to identify *which facts* the trial court considered that were allegedly probative of a more serious crime, as well as which "*more serious crime*" the facts allegedly supported. Br.App. at 10–12. There is therefore no basis for the claim that the trial court committed an error of constitutional magnitude as it pertains to the real facts doctrine. See *State v. Mason*, 170 Wn. App. 375, 384, 285 P.3d 154 (2012) ("[P]assing treatment of an issue or lack of reasoned argument is insufficient to merit judicial consideration") quoting *Holland v. City of Tacoma*, 90 Wn. App. 533, 538, 954 P.2d 290 (1998); see also *State v. Johnson*, 119 Wn.2d 167, 829 P.2d 1082 (1992); RAP 10.3(a)(6).

Moreover, the failure to object serves as acknowledgement of this information. See *State v. Phelps*, 113 Wn. App. 347, 358, 57 P.3d 624 (2002) quoting *State v. Garza*, 123 Wn.2d 885, 890, 872 P.2d 1087 (1994) ("in order to dispute any of the information presented for consideration at

a sentencing hearing, a defendant must make a timely and specific challenge."). Had Defendant actually disputed a material fact, it would have allowed for the court to address the matter in a separate hearing. RCW 9.94A.530(2) ("Where the defendant disputes material facts, the court must either not consider the fact or grant an evidentiary hearing on the point.").

Defendant's second allegation of manifest error affecting a constitutional right, that the trial court "violated the appellant's due process right to a fair sentencing when it made inappropriate commentary on victim statements during the sentencing hearing[,] " is also not supported by sufficient argument to warrant judicial consideration. Br.App. at 12.

The "appearance of fairness doctrine," which applies to judicial and quasi-judicial decisionmakers, seeks to prevent "the evil of a biased or potentially interested judge or quasi-judicial decisionmaker." *State v. Finch*, 137 Wn.2d 792, 808, 975 P.2d 967 (1999) quoting *State v. Post*, 118 Wn.2d 596, 618, 826 P.2d 599 (1992). Pursuant to the doctrine, a defendant can challenge the appearance of his or her decisionmaker's impartiality. Prior to 1992, the doctrine was applied "when decision-making procedures have created an *appearance* of unfairness." *Post*, 118 Wn.2d at 619 n.8. The court in *Post* changed the threshold at which the doctrine would apply, however, and the doctrine now requires "evidence of a judge's or decisionmaker's *actual or potential bias*." *Post*, 118 Wn.2d at 619 n.8 (emphasis added); see also *State v. Bilal*, 77 Wn. App. 720,

722, 893 P.2d 674 (1995) ("Before we can find a violation of this doctrine, however, there must be evidence of a judge's actual or potential bias."); *State v. Carter*, 77 Wn. App. 8, 11, 888 P.2d 1230 (1995).⁶ "A judge is presumed to perform his functions regularly and properly, without bias or prejudice." *State v. Leon*, 133 Wn. App. 810, 813, 138 P.3d 159 (2006).

Like her first alleged constitutional violation, Defendant fails to support her second alleged constitutional violation with sufficient argument to merit judicial consideration. Defendant does not provide any citations to the record that would identify the judge's actual or potential bias. Br.App at 14, 16–17. Instead, Defendant supports her claim of error by making broad conclusory statements. *See, e.g.*, Br.App. at 16 ("Here, the sentencing judge at least appears biased by the comments he made in response to the State's witnesses, and the stark contrast of those statement [sic] when compared with what he said to the appellant's supporters."); Br.App. at 14 ("Here, the appellant presents both an allegation of the appearance of bias or impropriety, and evidence thereof present in the comments the sentencing judge made regarding the culpability of the defendant while on the record, and before the defense presented its sentencing arguments."). The court should not consider this issue under RAP 2.5(a) because Defendant fails to provide any evidence of the judge's actual or potential bias.

⁶ Defendant acknowledges that "the record must contain evidence of a judge's actual or potential bias." Br.App. at 15.

2. DEFENDANT'S CHALLENGE TO HER STANDARD RANGE SENTENCE FAILS ON ITS MERITS.

- i. Even if this Court considers the merits of a challenge under the real facts doctrine, it fails because the court was required to consider the information Defendant complains of on appeal.⁷

Under RCW 9.94A.500, the court is *required* to consider "any victim impact statement" and *required* to "allow arguments from the prosecutor, the defense counsel, the offender, the victim, the survivor of the victim, or a representative of the victim or survivor, and an investigative law enforcement officer as to the sentence to be imposed." *Id.*

Defendant argues that it was improper for the court to hear the statements offered by Mr. Baucham's surviving family members and close friends. Br.App. at 11–12. According to Defendant, "it is the mere consideration of those facts that are not proven or admitted that is prohibited." Br.App. at 12. This argument, however, is foreclosed by RCW 9.94A.500.

⁷ It is questionable whether review on the merits is even possible, where, not only did Defendant fail to identify *which* facts the trial court allegedly considered that were probative of a more serious crime, but her briefing does not include "a separate concise statement of each error a party contends was made by the trial court[.]" RAP 10.3(a)(4); RAP 1.2(b).

Equitably, Defendant overlooks that she too had supporters speak at the sentencing hearing. 2 RP 24–36. Indeed, defense counsel wrote a sentencing memorandum and submitted it to the court for consideration in her behalf. CP 72–86. If the court is prohibited from considering unproven facts, and the statements from Mr. Baucham's family and friends are "unproven," it logically follows that the statements from Defendant's supports would also be prohibited because they have been "proven" to the same degree.⁸ There was no formal fact-finding hearing because Defendant chose to avoid a first degree murder prosecution and instead opted to plead guilty to second degree murder.

- ii. Even if this Court considers the merits of a challenge under the appearance of fairness doctrine, it fails because there is no evidence of Judge Rumbaugh's actual or potential bias.

A challenge pursuant to the appearance of fairness doctrine requires "evidence of a judge's or decisionmaker's *actual or potential bias*." *State v. Post*, 118 Wn.2d 596, 619, 826 P.2d 599 (1992) (emphasis added); *see also State v. Bilal*, 77 Wn. App. 720, 722, 893 P.2d 674 (1995) ("Before we can find a violation of this doctrine, however, there must be evidence of a judge's actual or potential bias."); *State v. Carter*, 77 Wn. App. 8, 11, 888 P.2d 1230 (1995). "A judge is presumed to

⁸ This argument sets aside the fact that Defendant did not object to any of the information presented at sentencing.

perform his functions regularly and properly, without bias or prejudice." *State v. Leon*, 133 Wn. App. 810, 813, 138 P.3d 159 (2006).

Here, review on the merits is challenging because the Defendant has not made specific assignments of error or supported this claim with argument. But, presuming review on the merits is possible, it is helpful to compare Judge Rumbaugh's comments to Mr. Baucham's surviving family members and close friends to those of Defendant's supporters. Presumably, this is where evidence of actual or potential bias would be derived. To this end, Appendices A and B are useful.

Comparing the court's comments to supporters on both sides confirms what case law presumes: Judge Rumbaugh performed his functions regularly and properly, without bias or prejudice. *Leon*, 133 Wn. App. at 813. Judge Rumbaugh expressed his condolences after listening to Mr. Baucham's supporters describe their collective heartache of losing a loved one. 1 RP 16–17, 18, 23–24, 31, 40–42, 47. Judge Rumbaugh's comments reflect that he was aware of the facts of the case, appreciative that family members took time to come support the deceased, and mindful of the effect that a murder can have on an entire community. *Id.* Judge Rumbaugh expressed his hope that Mr. Baucham's family members would be able to find closure amidst such a tragic event. 1 RP 47. None of his remarks are evidence of actual or potential bias.

Defendant's supporters had the opportunity to address the court a few weeks later, and defense counsel strategically chose to present three people on Defendant's behalf. 2 RP 6 ("The choice that we made as to who should speak to you today is really very intentional.") Judge Rumbaugh was appreciative and thankful, and indicated that he would take their remarks into consideration in making his sentence. 2 RP 27–28, 34, 36–37. As a practical matter, it appears that he *did* in fact take their remarks into consideration because, rather than imposing the maximum sentence sought by Mr. Baucham's supporters (1 RP 40), he imposed a mid-range sentence (220 months instead of 280 months).

Defendant misinterprets *State v. Carter*, 77 Wn. App. 8, 11, 888 P.2d 1230 (1995), as standing for the proposition that "[a] sentencing judge's inappropriate commentary on the evidence or testimony is evidence of bias or prejudice." (Br.App. at 14). But the court in *Carter* was not nearly so conclusive. The court found only that the judge's comments *in that case* were relevant and did not show actual or potential bias. The court did not establish a broad rule that, as a matter of law, "inappropriate commentary" is evidence of a judge's bias or prejudice. And here, there is no evidence of even "inappropriate commentary."

D. CONCLUSION.

For the reasons stated above, the State respectfully asks this Court to affirm the Defendant's sentence.

DATED: November 14, 2014.

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Certificate of Service:

The undersigned certifies that on this day she delivered by ~~US~~ 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.

11.14.14 
Date Signature

Appendix A

(In Mr. Baucham's Behalf)

Name	Relation	Cite	Judge's Response
Ms. Evelyn Robertson	Mr. Baucham's Aunt	1 RP 13	It is not my place to make the judgment of any higher power in this case, and I do not presume to do so, but with that said, the Court does not disagree on a factual basis that the seven elements of what you describe of as sin have been committed by Ms. Ray. I understand that Mr. Baucham had a loving heart, he loved his children, and that heart has not been stilled and that has created a loss that you will probably never recover from. I'm grateful for your time and attention. Thank you for taking the trouble to come in and speak with me today. I appreciate it. (1 RP 16–17).
Ms. Sharon Wilson	Mentor to Mr. Baucham	1 RP 17	Thank you, Ms. Wilson. I appreciate you coming in today. I understand that Mr. Baucham was happily looking to provide a suitable place for his children to live and to thrive and, unfortunately, crimes often spread their influence beyond the immediate victim and into family members, and that is obviously what has happened in this case. I will take your comments to heart. I appreciate your time, and thank you for coming in. (1 RP 17).
Rachael Baucham	Mr. Baucham's Sister	1 RP 19	Thank you, Ms. Baucham. As I told Ms. Wilson, crimes often have extended victimization. I am sorry that your children have lost their uncle. There is no way to make up for that. I am sorry that they are having to experience this loss as well. I am also sorry that you had to struggle through the duplicity that was manifested after your brother was killed and you had to plan his funeral and his final arrangements with his murderer. It seems somehow so terribly cold. I am grateful for your service to our country, ma'am. Thank you very much for coming here today. (1 RP 18).
Natalie Leath	Mr. Baucham's Grandmother	1 RP 20	Thank you very much, Ms. Leath. I appreciate again, as I have with all of the members of Mr. Baucham's family, that you have come in to speak with me today.

			It's clear that he was much loved by his family and he had a position in your family that was integral to many of your family occurrences. It is awful that his children have been deprived of fatherly support in a society where black men, rightly or wrongly, are often depicted as absent and uncaring. Mr. Baucham clearly was present for his children and had their interests at heart, and it just makes this all the worse. This also was, as you stated, a cold-blooded and calculated effort on Ms. Ray's part. I'm convinced of that. I will certainly take your comments into account as I determine what sentence to impose. Thank you for coming to speak with me. (1 RP 23-24).
Mr. Mark Robertson	Mr. Baucham's Uncle	1 RP 24	Thank you, Mr. Robertson. I guess I would first of all observe for you, sir, that the Court does not make the charging decisions, and I hope you understand that. I appreciate your explanation of how Mr. Baucham has assumed a role of a paternal head of his family and that he was connected with you and your family increasingly as he matured into a young adult and then into his adulthood. I certainly recognize that, despite the marital difficulties he might have experienced, nothing, absolutely nothing, justifies the conduct and the deadly assault that took Mr. Baucham's life. I regret you have had the repugnant experience, potentially a now haunting experience, of participating in the funeral of your beloved nephew with his murderer. I find that overwhelming. Thank you very much, sir, for your time today. I appreciate your words. (1 RP 31).
Ms. Lavonne Broen	Mr. Baucham's Mother	1 RP 31	Ms. Brown, thank you for your time. Reliving your son's final moments of life over and over again in your mind is, I'm sure, unspeakably agonizing. I have children of my own, and I can scarcely imagine the anguish that you have suffered with the loss of your son. So to you and all of your family members and all of the supporters who have gathered to be with you today, let me tell you that the Court recognizes there is no extinguishing fully the pain that accompanies the horror of having a beloved son or a brother or a nephew or a friend taken by an act of senseless and ruthless violence. I don't pretend to have words that will ease

			<p>your anguish or your despair or moderate the emotional torment that you have related to Leon's death and the circumstances of his death. To have disingenuous and even slanderous remarks disparaging Mr. Baucham lodged against him after his death, which, of course, he cannot respond to, only exacerbates the pain that you must feel. To have those remarks put forward as some sort of justification for premeditated murder is offensive to this Court's sense of justice in every way. Deception, Dishonor, disgrace and duplicity are prominent features of Ms. Ray's conduct. I will, because of serious health issues related to Mr. Clower, not proceed with her sentencing today, but I can assure you to a certainty that the Court will take into account your remarks, the fact that you and your family members and friends have appeared before the Court and at the time sentencing does take place. I can only hope for you and your family that the memory of your beloved Leon is somehow a blessing for you. Thank you, ma'am. Thank you very much. (1 RP 40-42).</p>
Mr. Rogers Wilson	Mr. Baucham's Close Friend	1 RP 42	<p>Thank you, Mr. Wilson. Violence begets violence, apparently. It certainly ripples through our broader community and sometimes seems to be beyond eradication, and then it leads us to these painful and disheartening moments. Your comments related to closure are important. I will try to bring that closure to the family, to everybody concerned here. Thank you all again for this challenging afternoon and your participation. (1 RP 47).</p>

Appendix B

(In Defendant's Behalf)

Name	Relation	Cite	Judge's Response
Edmond Holly Plaehn	Defendant's Pastor	2 RP 24	Thank you very much, sir, and I appreciate very much that you came in, Mr. Plaehn, and provided me with this information. I appreciate that your comments are genuine and they are heartfelt, and I believe that you have the best of intentions in trying to assist the Court in sorting out this challenging matter. Thank you, sir. (2 RP 27-28).
Lethaniel Ray	Defendant's Husband	2 RP 28	Mr. Ray, I appreciate your comments. I know that they came from your heart, and I imagine it was extraordinarily difficult for you to stand up here and address me under these circumstances. Thank you for your time. I will certainly keep your comments in mind. Thank you. (2 RP 34).
Umeko Baucham	Defendant's Daughter (& Mr. Baucham's wife)	2 RP 34	Ms. Baucham, it would be difficult to think of a more conflicting situation for any person to be in, and I feel terribly for you. You have lost your husband, you're going to lose your mom for some period of time, and I think that you feel guilt. You're not guilty. You're not guilty of anything other than being caught in the middle of a terrible polarizing situation. I appreciate your comments. I would say I know how hard it must have been for you to come here and speak to me this afternoon, but I'm not sure that any of us could really know that. Thank you. (2 RP 36-37).

PIERCE COUNTY PROSECUTOR

November 14, 2014 - 4:05 PM

Transmittal Letter

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Response to Personal Restraint Petition

Reply to Response to Personal Restraint Petition

Petition for Review (PRV)

Other: _____

Comments:

The brief previously filed did not contain the Table of Authorities.

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