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No. 96990-6

IN THE SUPREME COURT
FOR THE STATE OF WASHINGTON

NICOLE BEDNARCZYK and CATHERINE SELIN, individually and on
behalf of others similarly situated,
Appellants-Plaintiffs,
v.

KING COUNTY,
Appellees-Defendant.

AMICUS CURIAE BRIEF OF
THE KING COUNTY DEPARTMENT OF PUBLIC DEFENSE

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Other Authorities

- 2013-2017 American Community Service 5-Year Estimates*,
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- Anwar, S., Bayer, P., & Hjalmarsson, R., *Impact of Jury Race in Criminal Trials*, QUARTERLY JOURNAL OF ECONOMICS, Vol. 127, Issue 2 (May 2012),
<https://www.courts.wa.gov/subsite/mjc/docs/2017/The%20Impact%20of%20Jury%20Race%20in%20Criminal%20Trials.pdf> 2, 11
- Beckett, Katherine *The Under-Representation of Blacks in the King County Jury Pool* (May 11, 2016) 4, 6
- Equal Justice Initiative, *Illegal Racial Discrimination in Jury Selection: A Continuing Legacy*, 14 (2010)..... 10
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- Kang, J. & Carbado, D., *Implicit Bias in the Courtroom*, UCLA L. R., 59 UCLALR 1124 (2012)..... 11
- Minority and Justice Commission Jury Diversity Task Force, *2019 Interim Report*,
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- Race, Gender, and Juries: Evidence from North Carolina*, Flanagan, F., JOURNAL OF LAW & ECONOMICS, 61 JLECON 189 (2018)..... 12
- Sommers, Samuel R., *On Racial Diversity and Group Decision Making: Identifying Multiple Effects of Racial Composition in Jury Deliberation*, 90 J. PERSONALITY & SOC. PSYCHOL. 597, 608 (2006) .. 11

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Washington State Center for Court Research, *Juror Research Project: Report to the Washington State Legislature*, at 12 (December 24, 2008)
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I. INTRODUCTION

King County's longstanding practice of inadequately paying jurors results in homogenous juries that do not constitute a fair-cross section of King County's population because they lack racial diversity. Juries that lack racial and economic diversity exacerbate the harm the criminal legal system inflicts on people and communities of color because juries that lack racial diversity engage in shorter periods of deliberation, fail to consider and weigh all the evidence, make decisions infused with racial bias, and convict Black defendants and defendants of color at a significantly higher rate than white defendants.

II. IDENTITY AND INTEREST OF AMICI

The King County Department of Public Defense (DPD) provides representation for individuals in King County who are involved in the criminal legal system and cannot afford an attorney, people facing civil commitment, and parents and children subject to the child welfare system. *See* RCW 10.101.005; RCW 10.101.010. DPD's interests stretch beyond individual clients and their rights because DPD has a duty to foster and promote "system improvements, efficiencies, access to justice, and equity" in the criminal legal system. KCC 2.60.020(B)(7).

DPD has over 200 attorneys and represents over 85% of King County's indigent defendants, approximately 20,000 individual clients per year, many of whom are people of color. King County juries lack the racial and economic diversity present in our county. This lack of diversity harms DPD's clients and undermines their ability to obtain a fair trial. Studies demonstrate both that all-white juries convict defendants of color at higher rates than diverse juries and that all-white juries tend to make decisions predicated on racial and ethnic stereotypes and biases. Anwar, S., Bayer, P., & Hjalmarsson, R., *Impact of Jury Race in Criminal Trials*, QUARTERLY JOURNAL OF ECONOMICS, Vol. 127, Issue 2 (May 2012), <https://www.courts.wa.gov/subsite/mjc/docs/2017/The%20Impact%20of%20Jury%20Race%20in%20Criminal%20Trials.pdf>. The lack of racial diversity of King County juries deprives a substantial number of DPD's clients of the opportunity to have their cases determined by juries that are most likely to engage in thoughtful and bias-free deliberations.

Increasing juror pay results in more diverse jury venires and panels. DPD's duties to improve the criminal legal system and to protect the rights of its clients require it to support policies and practices that diversify juries in King County, including paying King County jurors Washington's hourly minimum wage. DPD submits this amicus brief in support of Appellants-Plaintiffs.

III. STATEMENT OF THE CASE

DPD adopts the Appellants-Plaintiffs' statement of the case.

IV. FACTUAL BACKGROUND

Black representation on King County juries hovers near 50% of what one would expect based on the Black population in King County.¹ Similarly, people of color are generally underrepresented on King County juries. This was recently confirmed when University of Washington Professor Katherine Beckett assessed the comparative disparities in the King County jury venire and found:

	Black Share of Adult Citizen Population	Black Share of Jury Pool	Absolute Disparity	Comparative Disparity
Seattle Jury Assignment Area Population/Seattle Survey	4.14%	2.29%	1.85%	44.7%
All King County Population/Seattle Survey	5.60%	2.29%	3.31%	59.1%
Kent Jury Assignment Area Population/Kent Survey	8.11%	5.33%	2.79%	34.4%

¹ See Hon. Rosen, S., Hickman, Matthew J., Ph.D. and Collins, Peter A., Ph.D., *Juror Data Issues Affecting Diversity (Juror Data Issues)*, at 35, 46, <https://www.courts.wa.gov/subsite/mjc/docs/2017/Juror%20Data%20Issues%20Affecting%20Diversity%20and%20WA%20Jury%20Demographic%20Survey%20Result%20-%20Judge%20Rosen%20and%20SU.pdf>.

All King County Population/Kent Survey	5.60%	5.33%	.27%	4.8%
All King County Population/All Survey Respondents	5.60%	3.61%	1.98%	35.5%

Beckett, Katherine, *The Under-Representation of Blacks in the King County Jury Pool* (May 11, 2016) (on file with author). Blacks are not the only communities of color that are underrepresented on King County’s juries. See *Juror Data Issues* at 31-38 (finding that American Indians, Latinos, and other communities of color are underrepresented on King County’s juries).

Continuing a 20-year practice of assessing the lack of diversity on Washington’s juries, in 2017, the Washington State Supreme Court’s Minority and Justice Commission co-hosted a symposium on jury diversity. Following the Symposium, the Washington State Supreme Court convened a task force to address the seemingly intractable problem of the empanelment of juries that fail to reflect the racial and economic diversity in Washington State. In 2019, the group examined a range of policy proposals aimed at increasing representation of people and communities of color on Washington State juries. Minority and Justice Commission Jury Diversity Task Force, *2019 Interim Report*, <http://www.courts.wa.gov/subsite/mjc/docs/Jury%20Diversity%20Task%20Force%20Interim%20Report.pdf> (last visited September 27, 2019). The group, after finding juror compensation in Washington “inadequate” and

that “lower income and minority populations are disproportionately affected by the financial hardships of jury service[,]” *id.* at 3, unanimously recommended that increasing juror compensation would likely increase jury diversity, *id.* at 4.

V. ARGUMENT

A. **King County’s Failure to Address Its Lack of Representational Juries Violates DPD Clients’ Right to a Trial Before a Fair Cross-Section of the Population**

A defendant’s Sixth Amendment right to a trial before a fair cross-section of the community is violated where: (1) a distinctive group in the community is excluded; (2) the representation of this group in venires is not fair and reasonable in relation to the number of such persons in the community; and (3) the underrepresentation is due to systematic exclusion of the group in the jury-selection process. *See Duren v. Missouri*, 439 U.S. 357, 364, 99 S.Ct. 664, 58 L.Ed.2d 579 (1979); *In re Yates*, 177 Wn.2d 18, 296 P.3d 872 (2013); *State v. Cienfuegos*, 144 Wn.2d 222, 232, 25 P.3d 1011 (2001). When determining whether underrepresentation of a population rises to the level of a Sixth Amendment violation, courts examine rates of “comparative disparity.” *See United States v. Hernandez-Estrada*, 749 F.3 1154, 1164-65 (9th Cir. 2014). If that statistical model shows underrepresentation, courts then look to whether the underrepresentation leads to an “actual, ‘real life’ impact on the jury pool

at issue. *Id.* at 1165 (noting that courts are to look to “people not percentages”).

King County’s failure to ensure diverse juries runs afoul of *Duren*’s protections. The first prong of the *Duren* test is met here as Blacks constitute a distinctive group for fair cross-section purposes. *See Lockhart v. McCree*, 476 U.S. 162, 175, 106 S.Ct. 1758, 90 L.Ed.2d 137 (1986). The second prong is also met. In King County, evidence shows that people of color — especially Blacks — are underrepresented on juries. *See Juror Data Issues Affecting Diversity*, Hon. Rosen, S., Hickman, Matthew J., Ph.D. and Collins, Peter A., Ph.D., <https://www.courts.wa.gov/subsite/mjc/docs/2017/Juror%20Data%20Issues%20Affecting%20Diversity%20and%20WA%20Jury%20Demographic%20Survey%20Result%20-%20Judge%20Rosen%20and%20SU.pdf>. *See also* Katherine Beckett, *The Under-Representation of Blacks in the King County Jury Pool*.

The underrepresentation of Blacks on King County’s juries is both statistically significant and results in an actual lack of Black jurors serving on juries. The rates of underrepresentation of Blacks in King County’s juries, including the comparative disparities of 40-50%, are similar to underrepresentation rates that courts have found violate the Sixth Amendment right to a jury comprised of a fair cross-section of the

community. See *United States v. Garcia-Dorantes*, 801 F.3d 584, 600 (6th Cir. 2015) (finding 42% and 27.64% comparative disparities sufficient to sustain a fair cross-section claim); *Azania v. State*, 778 N.E.2d 1253, 1260, 110 A.L.R.5th 725 (Ind. 2002) (finding that 48.2% comparative disparity sufficient to sustain a fair cross-section claim); *United States v. Rogers*, 73 F.3d 774, 777 (8th Cir. 1996) (finding 30% comparative disparity sufficient to sustain a fair-cross section claim).

The third prong of the *Duren* test asks whether underrepresentation is “due to the system by which juries are selected,” *Duren*, 439 U.S. at 367. “There is systematic exclusion when the underrepresentation is due to the system of jury selection itself, rather than external forces.” *Id.* To establish systematic exclusion, a defendant must establish the exclusion is “inherent in the particular jury-selection process utilized” but need not show intent. *Duren*, 439 U.S. at 366. If there is a pattern of underrepresentation of certain groups on jury venires, it stands to reason that some aspect of the jury-selection procedure is causing that underrepresentation. *Id.*

King County’s practice of underpaying jurors and excluding potential jurors who can only participate if they receive adequate compensation triggers the third prong of the *Duren* test because King County’s practice of underpaying jurors results in the systematic underrepresentation of jurors of color.

There are extensive racial disparities in wealth allocation in King County. In King County, 26.8% of Blacks, 17.9% of Latinos, and 22.7% of American Indians lived below the poverty level. *See 2013-2017 American Community Service 5-Year Estimates*, <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>. These rates are at least twice the rates of poverty in whites in King County. *Id.* (citing 7.6% of White King County residents live at the poverty level).

It is clear that underpayment for jury participation results in decreased jury participation of low-income individuals, and people of color, and that an increase in juror pay would likely positively impact the number of lower income and racially diverse prospective jurors serving on juries. *See* Washington State Center for Court Research, *Juror Research Project: Report to the Washington State Legislature*, at 12 (December 24, 2008) <https://www.courts.wa.gov/subsite/wscrr/docs/Juror%20Research%20Report%20Final.pdf>. *See also* Jury Diversity Task Force, *2019 Interim Report* (recommending increasing juror pay as a means of increasing jury diversity).

In King County, wealth stands as a proxy for race, and our jury system, which demonstrably tends to eliminate the less wealthy, “systematically” excludes Black jurors for the purposes of *Duren* which

results in DPD clients being tried before homogenous juries—in violation of the fair cross-section guarantee of the Sixth Amendment. *See Duren*, 439 U.S. at 364.

B. Failure to Ensure Its Juries Are Racially Diverse

The lack of jury diversity negatively impacts DPD’s clients, who are disproportionately Black and people of color. “This Court has taken judicial notice” that the criminal legal system is rife with “implicit and overt racial bias against black defendants.” *State v. Gregory*, 192 Wn.2d 1, 23, 427 P.3d 621 (2018). This Court has also acknowledged the long history of race discrimination in Washington’s legal system generally. *See, e.g., State v. Walker*, 182 Wn.2d 463, 488, 341 P.3d 976 (2015) (Gordon McCloud, J., concurring) (describing prosecutor’s use of inflammatory, racially charged images highlighting the defendant’s race—his blackness); *State v. Monday*, 171 Wn.2d 667, 676-79, 257 P.3d 551 (2011) (reversing a case in which the prosecutor argued to the jury that “ ‘black folk don’t testify against black folk’ ” and referred to the police as “ ‘po-leese’ ” in the examination of black witness); *Turner v. Stime*, 153 Wn. App. 581, 594, 222 P.3d 1243 (2009) (requiring new trial based on jurors’ racist remarks regarding Japanese-American attorney).

In addition to being part of Washington’s racially biased legal system, there are extensive racial disparities in King County’s criminal legal

system. Black individuals are five times more likely to be arrested than white individuals.² The Research Working Group, Task Force on Race and the Criminal Justice System (Task Force) found that “the fact of racial and ethnic disproportionality” in the criminal legal system in Washington and King County “is indisputable.” See Task Force, *Preliminary Report on Race and Washington’s Criminal Justice System*, 35 SEATTLE U. L. REV. 623 (2012) (finding youth of color overrepresented in the criminal legal system, prosecutors charge people of color at higher rates than whites, and that “race shapes confinement sentence outcomes”).

In a legal system rife with bias and a criminal legal system that disproportionately targets people of color, the racial and ethnic diversity of juries is critical to ensuring that all King County residents charged with crimes can receive a fair trial. Research shows that “compared to diverse juries, all-white juries tend to spend less time deliberating, make more errors, and consider fewer perspectives.” Equal Justice Initiative, *Illegal Racial Discrimination in Jury Selection: A Continuing Legacy*, 14 (2010). Whereas, racially diverse juries spend more time deliberating, discussing a wider range of case facts and personal perspectives, and make fewer factual

² Harris, Alexes, *Racial Disproportionality in the Criminal Justice System*, https://www.seattle.gov/Documents/Departments/Housing/PropertyManagers/ManagementResources/CriminalJusticeSystemDisparities_07-23-13.pdf

errors. *State v. Saintcalle*, 178 Wn.2d 34, 50, 309 P.3d 326 (2013) (citing Sommers, Samuel R., *On Racial Diversity and Group Decision Making: Identifying Multiple Effects of Racial Composition in Jury Deliberation*, 90 J. PERSONALITY & SOC. PSYCHOL. 597, 608 (2006)).

Research also shows that all-white juries convict at higher rates, generally, and convict Black people, specifically, at higher rates than other defendants. *See* Anwar, S., Bayer, P., & Hjalmarsson, R., *Impact of Jury Race in Criminal Trials*, QUARTERLY JOURNAL OF ECONOMICS, Vol. 127, Issue 2 (May 2012) (finding that “[w]hen there are no potential black jurors in the pool, black defendants are significantly more likely than whites to be convicted of at least one crime”). *See also* Kang, J. & Carbado, D., *Implicit Bias in the Courtroom*, UCLA L. R., 59 UCLALR 1124 (2012) (detailing jury composition research confirming that white juries convict Blacks and people of color at higher rates than racially diverse juries); Anwar, S., Bayer, P., & Hjalmarsson, R., *Impact of Jury Race in Criminal Trials*, QUARTERLY JOURNAL OF ECONOMICS, Vol. 127, Issue 2 (May 2012) <https://www.courts.wa.gov/subsite/mjc/docs/2017/The%20Impact%20of%20Jury%20Race%20in%20Criminal%20Trials.pdf> (affirming that “there is a significant gap in conviction rates for black versus white defendants when there are no blacks in the jury pool”). *See also* *Race, Gender, and Juries: Evidence from North Carolina*, Flanagan, F., JOURNAL OF LAW &

ECONOMICS, 61 JLECON 189 (2018) (affirming an increase in the proportion of the jury pool that is black results in a decrease in the conviction rate for both black and white defendants).

Research clearly shows that racial diversity significantly improves the reliability and accuracy of the criminal legal system and affords defendants and communities of color a better chance at receiving just resolution of their legal issues. This is because when the jury selection process excludes a distinct group of the population from service,

the effect is to remove from the jury room qualities of human nature and varieties of human experience, the range of which is unknown and perhaps unknowable . . . [The group's] exclusion deprives the jury of a perspective on human events that may have unsuspected importance in any case that may be presented.

Peters v. Kiff, 407 U.S. 493, 503-04, 92 S.Ct. 2163, 33 L.Ed.2d 83 (1972) (Marshall, J.) (citing *Ballard v. United States*, 329 U.S. 187, 193-94, 67 S.Ct. 261, 91 L.Ed. 181 (1946)).

VI. CONCLUSION

For the foregoing reasons this Court should protect the right of individuals involved in the criminal legal system in King County to have their matters heard by a jury comprised of a fair cross-section of their community, reverse the Court of Appeals, Division II, and hold that jurors fall within the ambit of Washington's minimum wage protections.

DATED this 27th day of September, 2019.

Respectfully submitted,

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s/ La Rond Baker _____

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