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Supreme Court No. 98026-8

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

Court of Appeals No. 79621-6-I

In re the Personal Restraint of:

Alejandro Garcia-Mendoza,

Petitioner.

SUPPLEMENTAL BRIEF OF PETITIONER

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TABLE OF CONTENTS

I. INTRODUCTION1

II. ISSUE PRESENTED ON REVIEW.....4

Whether the Court of Appeals erred by holding that Mr. Garcia-Mendoza’s personal restraint petition does not fall within the exception to the statute of limitations on collateral attacks provided for in RCW 10.73.100(6) because this Court’s decisions in State v. Sandoval, 171 Wn.2d 163, 249 P.3d 1015 (2011) and In re Personal Restraint of Tsai, 183 Wn.2d 91, 351 P.3d 138 (2015) did not overturn appellate precedent construing the statutory right to be advised of the immigration consequences of a criminal conviction under RCW 10.40.200?

III. STATEMENT OF THE CASE.....5

IV. ARGUMENT.....7

A. THE COURT OF APPEALS INCORRECTLY CONCLUDED THAT THIS COURT’S POST-PADILLA PRECEDENTS INTERPRETING RCW 10.40.200 DID NOT EFFECT A SIGNIFICANT CHANGE IN THE LAW THAT SHOULD BE APPLIED RETROACTIVELY TO MR. GARCIA-MENDOZA’S CASE.....7

1. Pre-Padilla Washington Precedent Precluded Claims for Relief Under RCW 10.40.200 Where the Defendant was Read the Standard Immigration Warning in Their Guilty Plea Statement.....8

2. This Court’s Decisions Applying Padilla to Washington Law Changed the Interpretation of RCW 10.40.200.....14

3. This Court’s Decisions Applying Padilla to Washington Law Constituted a Significant Material Change in the Law that Should be Applied Retroactively to Mr. Garcia-Mendoza’s Case.....18

V. CONCLUSION.....20

TABLE OF AUTHORITIES

Cases

<u>In re Personal Restraint of Light-Roth</u> , 191 Wn.2d 328, 422 P.3d 444 (2018)	20
<u>In re Personal Restraint of Peters</u> , 50 Wn. App. 702, 750 P.2d 463 (1998).....	18
<u>In re Personal Restraint of Stoudmire</u> , 145 Wn.2d 258, 36 P.3d 1005 (2001).....	19
<u>In re Personal Restraint of Tsai</u> , 183 Wn. 2d 91, 351 P.3d 138 (2015).....	<i>passim</i>
<u>In re Personal Restraint of Yim</u> , 139 Wn.2d 581, 989 P.2d 512 (1999).....	12
<u>Padilla v. Kentucky</u> , 559 U.S. 356, 130 S. Ct. 1473, 176 L. Ed. 2d 284 (2010).....	<i>passim</i>
<u>State v. Cortez</u> , 73 Wn. App. 838, 871 P.2d (1994).....	12, 19
<u>State v. Holley</u> , 75 Wn. App. 191, 876 P.2d 973 (1985).....	11, 12, 19
<u>State v. Jamison</u> , 105 Wn. App. 572, 20 P.3d 1010 (2001).....	13, 19
<u>State v. Martinez-Leon</u> , 174 Wn. App. 753, 300 P.3d 481 (2013).....	13, 14
<u>State v. Sandoval</u> , 171 Wn.2d 163, 249 P.3d 1015 (2011).....	<i>passim</i>
<u>State v. Littlefair</u> , 112 Wn. App. 749, 752, 59 P.3d 116 (2002).....	14, 17, 18
<u>Strickland v. Washington</u> , 466 U.S. 668, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984).....	6

Statutes

RCW 10.40.200.....*passim*
RCW 10.73.090.....7, 18
RCW 10.73.100.....*passim*

I. INTRODUCTION

The age-old legal maxim *ubi jus ibi remedium* dictates that where there is a right, there must be a remedy. In 1983, our state Legislature determined that the immigration consequences of criminal convictions were sometimes so severe for noncitizen defendants that in every case a defendant must be advised of the immigration consequences of their guilty plea. The right to advice about immigration consequences was codified in RCW 10.40.200. Our Legislature also created a remedy to ensure that the right to immigration advice was strictly enforced. Under the statute, where a defendant is not advised of the immigration consequences of a criminal conviction, the court must vacate the judgment and permit the defendant to withdraw the guilty plea. Once a defendant shows that they were not advised of the immigration consequences of their guilty plea, the plain language of RCW 10.40.200 makes vacatur of the conviction and withdrawal of the plea mandatory, without a showing of prejudice.

Tragically for many noncitizen Washingtonians, from the time of enactment of RCW 10.40.200 Washington courts incorrectly interpreted the statute to hold that reading the standard boilerplate immigration warning contained in all CrR 4.2 plea forms used since the enactment of the statute to a defendant prior to their plea was sufficient to satisfy RCW 10.40.200's requirements. As a result, Washington courts routinely denied claims for

relief from a conviction based on lack of immigration advice where it was established that the boilerplate plea form warning was read to the defendant.

Everything changed when the Supreme Court of the United States decided Padilla v. Kentucky, 559 U.S. 356, 130 S. Ct. 1473, 176 L. Ed. 2d 284 (2010). Padilla established once and for all that immigration consequences were not collateral to a guilty plea and that defendants must receive correct advice about the immigration consequences of a guilty plea before the plea is entered. In State v. Sandoval, 171 Wn.2d 163, 249 P.3d 1015 (2011), applying Padilla to Washington law, this Court announced that the presence of the standard advisement in a defendant's plea form was insufficient to save deficient immigration advice provided by a criminal defense attorney. Then, in In re Personal Restraint of Tsai, 183 Wn.2d 91, 351 P.3d 138 (2015), this Court held for the first time since the enactment of RCW 10.40.200, that the statute requires more than a general one-size-fits-all immigration warning, and that criminal defense counsel has a statutory obligation to research and apply RCW 10.40.200 to their client's unique circumstances. These new interpretations of RCW 10.40.200 overturned prior decisions to the contrary and breathed life into what had become a lifeless statutory provision.

The Court of Appeals denied Mr. Garcia-Mendoza's claim for relief under RCW 10.40.200 on the ground that his conviction was time-barred,

concluding that Mr. Garcia-Mendoza's claim did not fall within the scope of the exception to the time limit on collateral attacks for cases based on significant changes in the law set forth in RCW 10.73.100(6) because neither Sandoval nor Tsai changed the interpretation of RCW 10.40.200. In reaching its decision the Court of Appeals overlooked decades of caselaw holding that where a defendant received the standard immigration advisement found in their statement of defendant on plea of guilty, they had no basis for relief under the statute.

Because this Court's post-Padilla decisions changed the interpretation of RCW 10.40.200 and overturned earlier precedents construing that statute, Petitioner respectfully asks the Court to hold that his claim for relief is exempt from the time limit on collateral attacks under RCW 10.73.100(6), which creates an exception to the time limit on collateral attacks for claims based on significant changes in the law. Mr. Garcia-Mendoza further asks the Justices of this Court to enforce the statutory remedy provided for in RCW 10.40.200 and extend relief to Mr. Garcia-Mendoza and similarly situated litigants who like him would have been precluded from raising such a claim under earlier precedents interpreting RCW 10.40.200.

The Court's decision in this case will undoubtedly transcend the facts of Mr. Garcia-Mendoza's case and will affect the cases of many other

noncitizens who, like Mr. Garcia-Mendoza, are found to fall short of establishing prejudice under the traditional test for ineffective assistance of counsel but who can establish that their right to immigration advice under RCW 10.40.200 was violated. This category of people includes those with prior criminal convictions and those who were undocumented at the time their plea was entered and whose ability to obtain relief from deportation under the immigration laws was limited at the time of their plea. The Court's decision in this case will ultimately determine whether Mr. Garcia-Mendoza's family and many other families in Washington get a chance stay together.

II. ISSUE PRESENTED ON REVIEW

Whether the Court of Appeals erred by holding that Mr. Garcia-Mendoza's personal restraint petition does not fall within the exception to the statute of limitations on collateral attacks provided for in RCW 10.73.100(6) because this Court's decisions in State v. Sandoval, 171 Wn.2d 163, 249 P.3d 1015 (2011) and In re Personal Restraint of Tsai, 183 Wn.2d 91, 351 P.3d 138 (2015) did not overturn appellate precedent on the statutory right to be advised of the immigration consequences of a criminal conviction under RCW 10.40.200?

III. STATEMENT OF THE CASE¹

Petitioner, Alejandro Garcia-Mendoza, has lived in the United States in undocumented status since his parents brought him to this country when he was 13 years old. App. G, Ex. A (Declaration of Alejandro Garcia-Mendoza) at 1. While Mr. Garcia-Mendoza has made some mistakes in his life, for many years he has led a productive and pro-social lifestyle. His wife and 13-year-old daughter are citizens of the United States and rely on Mr. Garcia-Mendoza heavily for financial and emotional support. App. G, Ex. A at 2. Mr. Garcia-Mendoza's conviction for possession of a controlled substance in this case as well as two other simple drug possession convictions in the King County Superior Court prevent him from obtaining discretionary relief from deportation in immigration court and obtaining lawful permanent resident status in the future. See App. C (Order Transferring CrR 7.8 Motion) at 4.

Mr. Garcia-Mendoza has submitted evidence establishing that his criminal defense attorney did not advise him of the immigration consequences of his conviction in this case before he pleaded guilty,

¹ In the interest of judicial economy Petitioner incorporates the statement of facts and procedural history set forth in his Motion for Discretionary Review. Only the most relevant facts are included in Petitioner's Supplemental Brief. To avoid duplicative filings, citations to appendices in this brief are citations to the appendices filed in support of Mr. Garcia-Mendoza's Motion for Discretionary Review.

resulting in a clear violation of RCW 10.40.200. See App. G, Ex. A at 3; App. G, Ex. B (Declaration of Rachel Forde) at 1 – 2. However, because he was previously convicted of two other drug possession convictions that also carried immigration consequences and because his ability to obtain relief from deportation in immigration court at the time of his plea in this case was limited due to his undocumented status, the trial court found that Mr. Garcia could not establish that he was prejudiced by counsel’s deficient advice under the Strickland v. Washington² test for ineffective assistance of counsel and rejected his Sixth Amendment claim. App. C at 4 – 5.

Mr. Garcia-Mendoza argued in the alternative that even if he could not establish prejudice he was nonetheless entitled to relief under RCW 10.40.200, which does not require a showing of prejudice. App. G (Motion to Withdraw Plea) at 9 n.4; App. E (Response to Motion to Transfer) at 8 – 9. The trial court did not address Mr. Garcia-Mendoza’s statutory claim and instead transferred his case to the Court of Appeals as a personal restraint petition.

The Court of Appeals rejected Mr. Garcia-Mendoza’s alternative claim for relief under RCW 10.40.200 on the ground that his claim under RCW 10.40.200 was time-barred because it was brought more than one year

² Strickland v. Washington, 466 U.S. 668, 104 S. Ct. 2052, 80 L. Ed. 2d 674 (1984).

after the judgment and sentence in this case was entered. Specifically, the Court of Appeals concluded that Mr. Garcia-Mendoza's claim did not fall within the exception to the time limit on collateral attacks forth in RCW 10.73.100(6), for cases based on changes in the law, because neither Sandoval nor Tsai changed the law on the interpretation of RCW 10.40.200. App. A (Court of Appeals Decision) at 6 – 7. Petitioner moved for discretionary review of the Court of Appeals decision in this Court.

IV. ARGUMENT

A. The Court of Appeals Incorrectly Concluded That This Court's Post-Padilla Precedents Interpreting RCW 10.40.200 Did Not Effect a Significant Change in the Law That Should be Applied Retroactively to Mr. Garcia-Mendoza's Case.

The Court of Appeals denied Mr. Garcia-Mendoza's claim for relief under RCW 10.40.200 in this case because it concluded that the claim was time-barred under RCW 10.73.090. The Court of Appeals determined that although this Court's decision in In re Personal Restraint of Tsai exempts claims of ineffective assistance of counsel based on failure to advise of immigration consequences from the time limit on collateral attacks because Padilla constituted a significant material change in the law as to such claims, it does not exempt claims under RCW 10.40.200 from the time limit because there has been no significant change in law in the interpretation of that statute that would bring untimely claims within the

exception to the time limit set forth in RCW 10.73.100(6). In particular, the Court of Appeals concluded that this Court's post-Padilla decisions, Sandoval and Tsai, did not constitute a significant change in law within the meaning of RCW 10.73.100(6) with respect to the interpretation of RCW 10.40.200.

Because this Court's decisions in Sandoval and Tsai applying Padilla v. Kentucky to Washington law clearly effected a change in the interpretation of RCW 10.40.200, the Court of Appeals erred by concluding that those decisions did not effect a significant change in the law that is retroactively applicable to Mr. Garcia-Mendoza's case for purposes of the exception to the time limit on collateral attacks set forth in RCW 10.73.100(6) for claims based on significant material changes in the law.

1. Pre-Padilla Washington Precedent Precluded Claims for Relief Under RCW 10.40.200 Where the Defendant was Read the Standard Immigration Warning in Their Guilty Plea Statement.

In 1983, the Legislature enacted RCW 10.40.200, requiring that noncitizen defendants receive advice about the immigration consequences of a criminal conviction before entering a plea of guilty to a criminal offense. See RCW 10.40.200. The findings supporting the enactment of RCW 10.40.200 are set forth in RCW 10.40.200(1). That subsection states that the statute's enactment was necessary to promote fairness in cases involving noncitizen defendants because in many instances noncitizen

defendants pleaded guilty to offenses that carried immigration consequences without knowing that their plea would result in deportation, exclusion from admission to the United States, or denial of naturalization. Subsection (1) of the statute further outlines the advice that defendants are entitled to under the statute. Specifically, the statute states that before a plea is entered, a noncitizen defendant must be advised “of the *special consequences* for such a defendant which may result from the plea.” RCW 10.40.200(1) (emphasis added). In other words, the plain language of the statute requires that defendants receive case-specific advice about the immigration consequences of a criminal conviction.

The mechanism for enforcing the right to immigration advice created by the enactment of RCW 10.40.200 is set forth in 10.40.200(2), which provides:

Prior to the acceptance of a plea of guilty to any offense punishable as a crime under state law . . . the court shall determine that the defendant has been advised of the following potential consequences of conviction for a defendant who is not a citizen of the United States: Deportation, exclusion from admission to the United States, or denial of naturalization pursuant to the laws of the United States. A defendant signing a guilty plea statement containing the advisement required by this subsection shall be presumed to have received the required advisement. If, after September 1, 1983, the defendant has not been advised as required by this section and the defendant shows that conviction of the offense to which defendant pleaded guilty may have the consequences for the defendant of deportation, exclusion from admission to the United States, or denial of

naturalization pursuant to the laws of the United States, the court, on the defendant's motion, shall vacate the judgment and permit the defendant to withdraw the plea of guilty and enter a plea of not guilty. Absent a written acknowledgement, the defendant shall be presumed not to have received the required advisement.

RCW 10.40.200(2). Thus, RCW 10.40.200 creates both a right to immigration advice before a guilty plea is entered, and a remedy – withdrawal of the plea if the required advice is not provided. No showing of prejudice is required under the language of the statute.

After the enactment of RCW 10.40.200, Washington plea forms were amended to include a standard immigration advisement. See Tsai, 183 Wn.2d at 100. While the inclusion of a uniform immigration advisement in Washington plea forms was mandated by the legislation enacting RCW 10.40.200, the statute does not state that the uniform advisement is itself the advice required by the statute.³ Rather, the statute provides that a defendant must receive advice about the “special consequences” of their guilty plea and provides that vacatur of the judgment and withdrawal of the plea is required where “the defendant has not been advised as required by this section.” See RCW 10.40.200(1), (2).

Unfortunately, for many years after the statute's enactment, Washington Courts routinely held that the boilerplate immigration

³ Laws of 1983, Chapter 199, § 2.

advisement included in a CrR 4.2 plea form was itself the advice required by RCW 10.40.200. Washington caselaw is replete with cases so holding. State v. Holley, 75 Wn. App. 191, 876 P.2d 973 (1994), is a decision that illustrates how claims under RCW 10.40.200 were treated prior to Padilla and this Court's decision applying it to Washington law. In Holley, the defendant argued that he was denied the effective assistance of counsel because he was not advised that his conviction was a deportable offense and also that the failure to advise resulted in a violation of his statutory rights RCW 10.40.200. Holley, 75 Wn. App. at 197 – 99. Division II of Court of Appeals quickly disposed of the defendant's Sixth Amendment claim, asserting that "[e]ven if we assume that RCW 10.40.200 imposes a duty on attorneys to discuss immigration consequences with their clients, we find no basis to conclude that the statute also creates a constitutional right for a defendant to be so advised." Id. at 198. The court also narrowly construed RCW 10.40.200 to require only a reading of the uniform immigration advisement found in the defendant's plea statement. The questions that the Court of Appeals found most relevant in determining whether a violation of RCW 10.40.200 occurred were whether defense counsel had advised the defendant not to read the general immigration advisement in his plea statement and whether the defendant, in fact, did not read the advisement acting on counsel's advice. Id. at 201. In other words, the Court of Appeals

found that Holley could only establish a violation of the statute if he could establish that he was not read the standard warning in his statement of defendant on plea of guilty.

The same year that Holley was decided, a similar result was reached by Division III of the Court of Appeals in State v. Cortez, 73 Wn. App. 838, 871 P.2d (1994). The court found no violation of RCW 10.40.200 in Cortez, where the defendant's plea statement contained a general immigration advisement and the defendant stated during his plea hearing that he had read the plea form. Id. at 841. The court concluded in Cortez that "no explicit explanation of deportation possibilities is required" by RCW 10.40.200. Id. at 841. The Court of Appeals explained: "The statement on plea of guilty signed by Mr. Cortez contains a written notice that a conviction would result in deportation. It also bears his signature . . . there is no evidence to indicate he did not understand the rights set forth in his plea agreement." Id.

In the years after Holley and Cortez, this Court and the Court of Appeals reached the same conclusion. While a statutory claim under RCW 10.40.200 was not before this Court in In re Personal Restraint of Yim, 139 Wn.2d 581, 989 P.2d 512 (1999), this Court noted in dicta that the plea court's general advice to the defendant that the guilty plea "*may subject you to deportation, denial of naturalization, and also exclusion from the United States*" during the defendant's plea colloquy was sufficient to notify "the

defendant that he was at risk of deportation.” Id. at 590 (emphasis in original). Likewise, in State v. Jamison, 105 Wn. App. 572, 20 P.3d 1010 (2001), Division I of the Court of Appeals held the requirements of RCW 10.40.200 to be satisfied where the defendant’s plea statement contained a general immigration advisement and the prosecutor asked the defendant if he understood that a plea of guilty “will affect your ability to be in the United States.” Id. at 594.

Even after Padilla was decided, the Court of Appeals continued to hold and the State continued to argue that RCW 10.40.200 did not require case-specific advice about the immigration consequences of a guilty plea and that the general boilerplate advisement in a plea statement satisfied RCW 10.40.200.

In 2013, Division II of the Court of Appeals held in State v. Martinez-Leon, 174 Wn. App. 753, 300 P.3d 481 (2013), that a reading of the boilerplate immigration advisement was sufficient to satisfy the requirements of RCW 10.40.200 before Padilla was decided:

And, unlike Littlefair, Martinez-Leon signed a statement on the plea of guilty that provided, “If I am not a citizen of the United States, a plea of guilty to an offense punishable as a crime under state law is grounds for deportation, exclusion from admission to the United States, or denial of naturalization pursuant to the laws of the United States.” . . . Although Martinez-Leon’s defense counsel did not specifically advise him that a 365-day sentence on his assault conviction would result in definite deportation under United

States immigration laws, such an obligation was not required before Padilla.

Id. at 762.⁴ Indeed, in Sandoval itself, the State argued that the defendant's claim for relief should be rejected because his plea statement contained a standard immigration advisement, which was sufficient to put him on notice that his conviction carried immigration consequences. See Sandoval, 171 Wn.2d at 172 – 73.

In summary, before this Court applied Padilla to Washington law in Sandoval and Tsai a defendant who had the statutory immigration advisement read to him from his plea form had no basis to raise a claim for relief under RCW 10.40.200.

2. This Court's Decisions Applying Padilla to Washington Law Changed the Interpretation of RCW 10.40.200.

In 2010, the Supreme Court issued its decision in Padilla v. Kentucky, holding that failure to provide immigration advice to a criminal defendant constituted ineffective assistance of counsel. See Padilla, 559 U.S. at 368 – 69. This Court applied Padilla to Washington law through its decisions in Sandoval and Tsai. These decisions marked a clear departure from the line of cases holding that merely advising a defendant in general

⁴ While Martinez-Leon did not involve a statutory claim under RCW 10.40.200, the quoted language is taken from the portion of the opinion discussing State v. Littlefair, 112 Wn. App. 749, 51 P.3d 116 (2002), which did involve a statutory claim.

terms of possible immigration consequences was enough to satisfy RCW 10.40.200.

In Sandoval, this Court held that the presence of a standard immigration advisement in a plea statement is not sufficient to establish that counsel's duty to warn their client about immigration consequences was satisfied. Sandoval, 171 Wn.2d at 173. The Court determined in Sandoval that a reading of the standard advisement was not enough to save counsel's deficient advice about the immigration consequences of a plea. See id.

Then, in In re Personal Restraint of Tsai, this Court announced that the rule established in Padilla had actually been the law in Washington since the enactment of RCW 10.40.200 in 1983. This Court also held for the first time that the boilerplate advisement found in Washington's plea forms was not itself the advice required by RCW 10.40.200 and that the statute gives noncitizens the "unequivocal right to advice regarding immigration consequences" and requires defense counsel to research and apply RCW 10.40.200 to his or her client's case. See Tsai, 183 Wn. 2d at 101. The Court reasoned:

Our legislature did [in 1983] what Padilla did in 2010—it rejected the direct-versus collateral distinction as applied to immigration consequences, declaring that a noncitizen defendant must be warned of immigration consequences before pleading guilty. To give effect to this statute, the

standard plea form in CrR 4.2 was promptly amended to include a statement warning noncitizen defendants of possible immigration consequences. *That warning statement is not, itself, the required advice; it merely creates a rebuttable presumption that the defendant has been properly advised.*

RCW 10.40.200's plain language gives noncitizen defendants the *unequivocal right to advice regarding immigration consequences and necessarily imposes a correlative duty on defense counsel to ensure that advice is provided.* . . . While defense counsel's duty to advise regarding immigration consequences is imposed by statute, reasonable conduct for an attorney includes carrying out the duty to research the relevant law. *In many cases defense counsel's failure to fulfill his or her statutory duty may be due to an unreasonable failure to research or apply RCW 10.40.200, and there is no conceivable tactical or strategic purpose for such a failure.*

Tsai, 183 Wn.2d at 101 – 02 (emphasis added); (internal citations and quotation marks omitted). This holding overruled prior cases holding that a general advisement about immigration consequences is sufficient to satisfy RCW 10.40.200 and clarified that the statute requires defense counsel to research the immigration consequences of each particular case and provide clients with case-specific immigration advice. See id. at 106 – 07.

This Court's decision in Tsai makes clear that RCW 10.40.200 itself, separate and apart from the Sixth Amendment, imposes a duty on counsel to research and advise a defendant of the specific immigration consequences of their guilty plea and not just repeat the warning found in

the statement of defendant on plea of guilty. If, as this Court stated in Tsai, our Legislature did in 1983 what the Supreme Court did in Padilla, then our immigration warning statute has necessarily required case-specific advice about the immigration consequences of a guilty plea since its enactment. As discussed above, our courts failed to give effect to the Legislature's intent by construing the statute to require only a general boilerplate warning.

After Tsai it is indisputable that counsel's failure to advise a defendant of the special consequence of the defendant's particular guilty plea constitutes a violation of RCW 10.40.200. See Tsai, 183 Wn.2d at 101 – 02. The statute also creates a remedy, which cannot be divorced from a statutory violation. Specifically, where the advice required by the statute is not provided, upon a defendant's motion the court "shall vacate the judgement and permit the defendant to withdraw the plea of guilty." RCW 10.40.200. Enforcing the statutory language, courts construing the statute have vacated convictions for violations of RCW 10.40.200 without a showing of prejudice. In State v. Littlefair, after finding a violation of RCW 10.40.200, the Court of Appeals vacated the defendant's conviction without a showing of prejudice. The Court explained: "In summary, RCW 10.40.200 gave Littlefair a statutory right, independent of any constitutional right, to be advised of the deportation consequences of his

plea. He was not so advised Thus, we vacate the plea and sentence and remand for further proceedings.” *Id.* 112 Wn. App at 762; see also In re Personal Restraint of Peters, 50 Wn. App. 702, 705, 750 P.2d 463 (1998) (“After this date, if a defendant is not advised as required by RCW 10.40.200(2) and shows that conviction of the offense to which a guilty plea was entered may lead to deportation, the court shall vacate the judgment and permit the withdrawal of the plea.”).

3. This Court’s Decisions Applying Padilla to Washington Law Constituted a Significant Material Change in the Law that Should be Applied Retroactively to Mr. Garcia-Mendoza’s Case.

RCW 10.73.100(6) provides that the time limit specified in RCW 10.73.090 does not apply to a petition or motion that is based solely on the fact that:

There has been a significant change in the law, whether substantive or procedural, which is material to the conviction, sentence, or other order entered in a criminal or civil proceeding instituted by the state or local government, and either the legislature has expressly provided that the change in the law is to be applied retroactively, or a court, in interpreting a change in law that lacks express legislative intent regarding retroactive application, determines that sufficient reasons exist to require retroactive application of the changed legal standard.

RCW 10.73.100(6). This Court has held that a decision constitutes a “significant change in the law” for purposes of RCW 10.73.100(6) when it “has effectively overturned a prior appellate decision that was originally

determinative of a material issue.” See In re Personal Restraint of Greening, 141 Wn.2d 687, 697, 9 P.3d 206 (2000). “One test to determine whether an appellate decision represents a significant change in law is whether the defendant could have argued this issue before publication of the decision.” In re Personal Restraint of Stoudmire, 145 Wn.2d 258, 264, 36 P.3d 1005 (2001). The Court of Appeals acknowledged this standard, but failed to apply it correctly to Mr. Garcia-Mendoza’s case, finding that neither Sandoval nor Tsai changed the interpretation of RCW 10.40.200.

As the foregoing analysis demonstrates, prior to the issuance of the decisions in Padilla, Sandoval, and Tsai, Mr. Garcia-Mendoza was precluded from arguing that a violation of RCW 10.40.200 occurred in his case, because under the holdings of cases like Holley, Cortez, and Jamison the simple fact that his attorney read to him the boilerplate immigration warning in his statement of defendant on plea of guilty was sufficient to satisfy RCW 10.40.200. However, after the issuance of these decisions, it was established that such advice was not sufficient to satisfy the requirements of RCW 10.40.200, and that his attorney was required to research and apply RCW 10.40.200 to Mr. Garcia-Mendoza’s specific case, which she failed to do. See Tsai, 183 Wn.2d at 102.

This Court’s decisions applying Padilla to Washington law unquestionably changed the interpretation of RCW 10.40.200 and effected

a significant change in the law within the meaning of RCW 10.73.100(6) by overturning precedent that would have precluded Mr. Garcia-Mendoza from arguing that a violation of RCW 10.40.200 occurred in his case. See In re Personal Restraint of Light-Roth, 191 Wn.2d 328, 334 (2018) (“A “significant change in the law” is likely to have occurred if the defendant was unable to argue the issue in question before publication of the intervening decision.”). Because Sandoval and Tsai constituted a material change in law that is retroactively applicable to Mr. Garcia-Mendoza’s case for purposes of the exemption from the time-bar set forth in RCW 10.73.100(6), his claim under RCW 10.40.200 should be allowed to proceed and the Court should grant relief as required under that statute.

V. CONCLUSION

For the foregoing reasons, the Court should reverse the decision of the Court of Appeals in this case, vacate the judgment, and permit Mr. Garcia-Mendoza to withdraw his guilty plea.

Respectfully submitted this 7th day of August 2020.

BLACK & ASKEROV, PLLC

s/Teymur Askerov

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