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COURT OF APPEALS
DIVISION ONE
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NO. 68020-0-1

COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION I

STATE OF WASHINGTON,
Respondent/ Cross-Appellant,

RECEIVED
COURT OF APPEALS
DIVISION ONE

v.

OCT 15 2017

MICHAEL EMERIC MOCKOVAK,
Appellant/ Cross-Respondent.

APPEAL FROM THE SUPERIOR COURT FOR KING COUNTY

THE HONORABLE PALMER ROBINSON
THE HONORABLE MICHAEL HAYDEN

BRIEF OF RESPONDENT/ CROSS-APPELLANT

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A. CROSS-ASSIGNMENTS OF ERROR

1. The trial court erred in entering the restitution order of September 22, 2011, and in concluding that the requested travel expenses, business expenses, and legal expenses could not under any circumstances be awarded as restitution.

2. The trial court erred in reaching the legal conclusion that the requested travel expenses, business expenses, and legal expenses could not be causally related to the crimes and thus could not be recoverable as restitution.

3. The trial court erred in entering the November 7, 2011, order setting restitution based on an erroneous legal conclusion that the scope of restitution available was more narrow than the law provides, and without determining whether the other expenses requested were caused by the defendant's crimes, and if the expenses were caused by the defendant's crimes, ordering restitution for those expenses.

B. ISSUES PRESENTED BY CROSS-ASSIGNMENTS OF ERROR

1. The victim and his family returned early from a vacation in Australia when the victim learned that Mockovak had arranged for

the victim's murder to occur during that trip. Did the trial court err in concluding that the victim's additional travel expenses could not have been a direct result of the defendant's crimes and thus were not properly included as restitution?

2. The eye-surgery business co-owned by the defendant and his victim employed public relations experts to assist in repairing the damage to the reputation of the business caused by Mockovak's crimes. The business also paid a substitute doctor to perform surgery when the victim was required to attend trial proceedings. Did the trial court err in concluding that these expenses, which were causally related to the defendant's crimes, could never be recoverable as restitution?

3. Attorney fees in this case were incurred: to protect the victim's family, his business, and his employees after the murder plot by the victim's business partner was revealed; to recover the value of the damage to the firm as a result of the crimes; and in preparation for the criminal trial. Did the trial court err in concluding that these legal expenses of the victim, which were causally related to the defendant's crimes, could never be awarded as restitution because they were not related to recovery of stolen property?

C. ISSUES PRESENTED BY MOCKOVAK'S APPEAL

1. Whether the trial court properly exercised its discretion when it ordered restitution to the victim for medical expenses incurred by the victim as a result of the criminal proceedings.

2. Whether the trial court properly ordered restitution for the portion of those medical expenses that were paid by an insurance provider.

D. STATEMENT OF THE CASE

1. PROCEDURAL FACTS

The defendant, Michael Mockovak, was charged with solicitation to commit murder in the first degree of Dr. Joseph King, attempted murder in the first degree of Dr. King, conspiracy to commit theft in the first degree, and attempted theft in the first degree (from Prudential Life Insurance). CP/T 412-14, 604-08.¹ Mockovak was tried in King County Superior Court, the Honorable Palmer Robinson presiding. 5RP 1.² These convictions are the subject of a separate appeal in this Court, No.66924-9-I.

¹ The Clerks' Papers designated in the appeal from Mockovak's convictions will be cited as CPT. Those designated in this appeal will be cited as CPR.

² The Verbatim Record of Proceedings will be cited by volume, consecutively numbered. A table listing the volumes and the hearing dates included in each is attached as Appendix 1.

After sentencing, Mockovak retained new counsel, James Lobsenz, who moved for the trial judge to recuse herself from the case based on the former law partnership and good friendship of Lobsenz with the judge. CP/R 2-4. The trial judge did recuse herself. CP/R 219-20. Thus, the restitution hearings were before the Honorable Michael Hayden. 21RP 1.

2. SUBSTANTIVE FACTS

Early in 2009, Daniel Kultin worked at Clearly Lasik, a business owned by two doctors, defendant Michael Mockovak and victim Joseph King. 11RP 104. Kultin became concerned that Mockovak intended to have a former employee, who was suing the business, killed. 11RP 121-25. Kultin contacted the FBI, and FBI agents convinced him to cooperate with an investigation of that crime. 10RP 69; 11RP 127.

Kultin and Mockovak had a number of conversations about the availability and costs of hit men. Tr. 8/5; Tr. 8/11; Tr. 10/20; Tr. 10/22.³ By October of 2009, the two doctors were involved in a heated dispute about splitting up the business and Mockovak had decided to hire hit men to kill King. Tr. 10/20 at 61-64. Mockovak

³ The transcript of the recordings admitted into evidence during the trial, itself admitted as Exhibit 54, will be cited as "Tr." followed by the date of the recording and page number.

intended to collect the proceeds of a four-million-dollar insurance policy he owned insuring King's life. Tr. 11/6 at 93.

Mockovak and Kultin had a recorded conversation on October 22, 2009, at the Bellevue Athletic Club. 12RP 60-61. Kultin said that he had spoken with his friend and Australia would be easy. Tr. 10/22 at 140. Mockovak asked whether the flight information would be enough to find King. Id.

Mockovak exclaimed that Australia was perfect for the murder because it would never come back here. Id. at 154-55. Mockovak described how he would try to get additional flight and lodging information, saying "I love this thing!" Id. at 157-59, 162-64. When Kultin said that he was sure they could make King disappear in the ocean, Mockovak responded, "That's awesome." Id. at 160.

In a conversation on November 6, 2009, Kultin asked whether Mockovak wanted to send a message; Mockovak said he did not care, "I just want him the fuck out of my way." Tr. 11/6 at 58. Kultin told Mockovak that he wanted to make sure that Mockovak was okay with it. Id. at 61. Mockovak concluded, "The only sure way is this." Id. at 67, 71. He added that King really had this coming. Id. at 67.

In a recorded conversation with Kultin on November 7, 2009, Mockovak said that he was very glad they went out the night before, because it gave him time to contemplate, it gave him 24 hours to think about it. Tr. 11/7(phone call) at 3-4. Mockovak said, "It's absolutely the right thing to do." Id. at 4. Staff members at the clinic testified that Mockovak was unusually cheerful that day and in the days following. 14RP 94, 123.

On November 7, 2009, Mockovak took a portrait of King and his family from one of the offices, wrote down the details of King's flight to Australia that evening, and turned over both of those items along with a \$10,000 cash down payment to Kultin, to provide to hit men in order to have King murdered while King was in Australia over the next week. 13RP 43-44, 47. Mockovak had previously instructed Kultin that he wanted to have King's body discovered, to make sure there was no problem with the life insurance claim. Tr. 11/06 at 54.

On November 11, Kultin called Mockovak to tell him that King had been located in Australia and they should hear in a couple of days that the job was done. Tr. 11/11 at 2, 4. Mockovak responded, "That sounds good," and the conversation turned to dating and business. Id. at 4-12.

3. RESTITUTION PROCEEDINGS

Judge Hayden limited the issues to be presented at the September 22, 2011, restitution hearing to legal issues regarding the limits of restitution. 21RP 20.

The State requested restitution for losses to Dr. King in five categories: medical expenses; travel expenses for his early return from Australia after being informed of the plot to murder him there; expenses for a public relations firm that assisted with the damage to the reputation of the eye surgery business; the cost of having another surgeon cover surgeries that King had to miss because of required attendance at the criminal trial; and legal expenses related to both the criminal proceedings and to civil suits brought to recover damages from Mockovak. CP/R 222, 272-73; 21RP 14-16.

Mockovak did not dispute a request for ten dollars as reimbursement for a prescription for anxiety medication for Dr. King's wife. 21RP 37. Mockovak agreed that medical expenses could be appropriate restitution but when the court indicated that it intended to order restitution for double the \$1533 request for cardiology treatment for Dr. King, Mockovak contested that the treatment was a direct result of the crimes. 21RP 30-31. That

factual question was deferred to a hearing on November 4, 2011. 21RP 39. The court asked that King's doctor specify whether the treatment at issue was related to the stress of having been the victim of a threatened murder. 21RP 31-32.

The court denied the remainder of the expenses claimed, explaining that the appellate courts had construed the restitution statute more narrowly than the statutory language and that he did not believe the other types of expenses claimed could be ordered. 21RP 27-30. The court stated that he thought the expenses should be included as restitution and that he hoped that his ruling would be appealed, but believed that any broader interpretation would be reversed. 21RP 27.

A letter from King's cardiologist stated that the expenses requested were for treatment for chest pains in September and October of 2010. CP-R 255. She opined that King's symptoms "were a direct result of stress suffered from criminal proceedings associated with his practice." CP-R 255. By letter of October 31, 2011, Mockovak's attorney indicated that he believed the court was "now in a position to decide" the remaining restitution issue on the basis of the papers filed. CP-R 266. The court ordered restitution to King of \$1543.34 on November 7, 2011. CP-R 258.

Mockovak appealed from the November 7, 2011, restitution order. CP-R 259. The State cross-appealed. CP-R 262-65. Mockovak moved to strike the State's cross-appeal as to Judge Hayden's September 22, 2011, ruling and that motion has been separately briefed and referred to the panel.

E. ARGUMENT

1. THE TRIAL COURT'S NARROW INTERPRETATION OF THE RESTITUTION STATUTE WAS A LEGAL ERROR THAT CONSTITUTED AN ABUSE OF DISCRETION.

The trial court limited its restitution order based on an incorrect interpretation of the restitution statute, a narrow interpretation inconsistent with the statutory language, case law interpreting that language, and public policy. Most of the expenses claimed by Dr. King as restitution could be causally related to the crimes for which Mockovak was convicted. The travel expenses, the expenses to repair the damage to the public image of the business, and legal expenses all could have been causally related to the crimes and compensable as restitution. Thus, the court's order denying these expenses as a matter of law should be reversed and on remand, the trial court should conduct an

evidentiary hearing to determine which of these expenses were causally related to the crimes in this case.

A trial court's restitution order will be reviewed only for an abuse of discretion. State v. Tobin, 161 Wn.2d 517, 523, 166 P.3d 1167 (2007). The court's application of an incorrect legal analysis or another error of law can constitute an abuse of discretion. Id.

a. The Restitution Statute Is Interpreted Broadly To Compensate Victims Of Crime.

The trial court's authority to order restitution to the victims of these crimes derives entirely from RCW 9.94A.753. Tobin, 161 Wn.2d at 523. When interpreting the restitution statutes, Washington courts "recognize that the statutes were intended to require the defendant to face the consequences of his or her criminal conduct." Id. at 524, citing State v. Davison, 116 Wn.2d 917, 922, 809 P.2d 1374 (1991). The Supreme Court recently reaffirmed that the legislature intended "to grant broad powers of restitution" to the trial court. Tobin, 161 Wn.2d at 524, quoting Davison, 116 Wn.2d at 920.

Restitution "shall be ordered whenever the offender is convicted of an offense which results in injury to any person or

damage to or loss of property” unless extraordinary circumstances make restitution inappropriate. RCW 9.94A.753(5). Restitution must be “based on easily ascertainable damages for injury to or loss of property” and the amount cannot exceed twice the offender’s gain or the victim’s loss from the commission of the crime. RCW 9.94A.753(3).

Restitution is limited to losses that are causally connected to the crimes charged, but foreseeability is not required. Tobin, 161 Wn.2d at 524. Causation is determined using a “but for” analysis. Id., citing State v. Kinneman, 155 Wn.2d 272, 287-88, 119 P.3d 350 (2005), and State v. Hiatt, 154 Wn.2d 560, 566, 115 P.3d 274 (2005). Funds spent by a victim (whether or not an immediate victim) as a direct result of the crime can be a loss of property awarded as restitution. Tobin, 161 Wn.2d at 524, citing Kinneman, 155 Wn.2d at 287.

The definition of “victim” is “any person who has sustained emotional, psychological, physical, or financial injury to person or property as a direct result of the crime charged. RCW 9.94A.030(53). However, the restitution statute does not require that every reimbursed expense be a direct result of the crime, just that it result from the crime. RCW 9.94A.753(3), (5).

b. Travel Expenses Incurred Because Of Mockovak's Murder Plot May Be Awarded.

The trial court erred in concluding that King's travel expenses for his family's early return from their Australian vacation could not be a compensable result of the crimes.

While King was on vacation in Australia with his wife and three children, he learned that his business partner, Mockovak, had arranged to have King killed during that vacation. 13RP 43-44; Tr. 11/7 (park) at 20; 21 RP 15-16. King's decision to immediately leave Australia and return his family to Seattle was a result of Mockovak's plot to kill King. But for that plot, the money King spent to return early would not have been spent.

The trial court's denial of restitution for this expense was based on its conclusion that appellate courts interpret the restitution statutes narrowly. 21RP 29. That legal analysis was incorrect—the Supreme Court has held that courts' restitution powers are broad. Tobin, 161 Wn.2d at 524.

The "but for" analysis of causation endorsed by the Supreme Court in Tobin and Kinneman makes clear that expenses that are not directly repair or replacement of property or medical care for

injuries can be proper restitution. Costs that a victim incurs as the result of a defendant's crimes constitute a loss of property under the restitution statute. Tobin, 161 Wn.2d at 526-27. The language of the restitution statutes indicates legislative intent to grant broad powers to order restitution to victims of crime. Davison, 116 Wn.2d at 920.

If, as King's counsel at the restitution hearing indicated, the apparent necessity to protect his family and his business caused King to return early from Australia, those expenses were incurred as a result of the crimes that Mockovak committed, solicitation and attempted murder. This Court should remand for the trial court to make a factual finding as to whether being targeted for murder caused King to incur the expense of an immediate return from Australia. If so, that expense is properly awarded as restitution.

**c. Damage to The Business Caused By
Mockovak's Murder Plot May Be Awarded.**

The trial court erred in concluding that expenses incurred by Clearly Lasik as a result of the crimes could not be awarded as restitution. The fees that it paid to a crisis-based public relations firm and the fees that it paid to a doctor to perform surgeries for

which Dr. King was unavailable could have been the result of these crimes and thus compensable. Remand to determine whether that causal connection existed is appropriate.

A business that suffers a loss by spending funds can be awarded restitution even if it the business is not the direct victim of the crime and even if the business is not legally obligated to incur the expense. Tobin, 161 Wn.2d at 524; Davison, 116 Wn.2d at 921-22. See also State v. Johnson, 69 Wn. App. 189, 193-95, 847 P.2d 960 (1993)(restitution was properly awarded for money that victim paid to friends who helped review the books and determine the amount of embezzlement, even though victim was not obliged to pay the friends anything).

Certainly the reputation of Clearly Lasik suffered because one of its primary surgeons plotted and paid to have the other primary surgeon killed. Some patients or potential patients would be concerned about whether the clinics were a safe place to be. Other patients would be concerned about whether a business that employed Mockovak was making wise personnel decisions, and that other employees might be unstable or at least unreliable. It is also possible that other merchants would choose not to do business with an operation that appeared to be on such an

unstable footing. It is likely that the public relations firm was hired to respond to these potential harmful consequences of Mockovak's crimes. The expenses incurred were between January 7, 2011, and February 10, 2011, when the crimes and the business were receiving maximum negative publicity, during the criminal trial. CP-R 341-43.

Similarly, if the costs of the substitute surgeon were incurred by the business because demands of the trial made Dr. King unavailable, those costs would not have occurred but for the crimes. The trial court erred in concluding that because the costs were related to the trial they could not be compensable. The court might conclude the amount requested was greater than the actual loss to the victim, but Dr. King probably would have been directly compensated at a lower rate for those surgeries, as an owner of the business, so at least some loss occurred.

Imposition of costs related to a trial is not constitutionally impermissible. Trial costs may not be imposed as a penalty for exercise of the right to a trial. State v. Richardson, 105 Wn. App. 19, 19 P.3d 431 (2001). However, costs are not deemed an impermissible penalty simply because they relate to a trial. Some trial costs may be imposed on a defendant as a term of sentence,

including costs of an initial mistrial.⁴ State v. Buchanan, 78 Wn. App. 648, 653, 898 P.2d 862 (1995). Costs of an expert witness at trial also may be imposed on a defendant. State v. Baggett, 103 Wn. App. 564, 572, 13 P.3d 659 (2000). Compensating a victim for funds spent in connection with a trial is no different.

This Court should remand for the trial court to make factual finding as to whether these expenses were caused by Mockovack's crimes. If the expenses would not have been incurred but for those crimes, the trial court should have the discretion to order restitution for easily ascertainable costs.

**d. Legal Expenses Caused By The Murder Plot
May Be Awarded.**

The trial court erred in concluding that legal expenses may be awarded as restitution only if the expenses are incurred in order to recover property. The possibility of recovery of legal expenses is not so limited.

The Supreme Court has approved the award of attorney fees as damages on which restitution may be based. Kinneman, 155 Wn.2d at 288. The Court held that the award of attorney fees is not

⁴ RCW 10.01.160 authorizes imposing costs on defendants, including a jury fee, but excludes costs inherent in providing a jury trial.

limited to situations in which the fees were incurred to investigate and assess a loss, or in which the fees were necessary to obtain a civil recovery. Id. at 289, citing State v. Wilson, 100 Wn. App. 44, 995 P.2d 1260 (2000), and State v. Christensen, 100 Wn. App. 534, 997 P.2d 1010 (2000). In Wilson, restitution for attorney fees was upheld, where the attorneys were used to investigate the extent of the embezzlement charged and establish the victim's loss. 100 Wn. App. at 51-52. In Christensen, restitution was approved for the fees the victim paid to an attorney to bring a civil suit to recover her some of her losses in an securities fraud case. 100 Wn. App. 537-38.

King represented that attorney fees in this case were incurred to protect King's family, his business, and his employees after the murder plot was revealed, in preparation for the criminal trial, and to recover the value of the damage to the firm as a result of the crimes. These expenses were losses directly resulting from the crimes. Some of these fees may have been incurred in investigating the extent of Mockovak's criminal activity for those purposes. To the extent that the fees can be attributed to these functions, they are awardable as restitution.

This Court should remand for the trial court to make factual finding as to whether these expenses were caused by Mockovack's crimes. If the court determines that the expenses would not have been incurred but for those crimes, the trial court should have the discretion to order reasonable restitution for easily ascertainable costs.

2. THE TRIAL COURT PROPERLY EXERCISED ITS DISCRETION IN CONCLUDING THAT KING'S MEDICAL EXPENSES WERE A DIRECT RESULT OF THESE CRIMES.

Mockovak argues that the trial court abused its discretion in ordering payment of \$1533.34 for Dr. King's treatment for chest pains in the fall of 2010 because no evidence supported the court's finding that there was a causal relationship between the crimes and the medical expenses. This argument should be rejected. All of the aspects of the stress reported by King related to Mockovak's murder plot. The court did not abuse its discretion in ordering restitution for these medical expenses.

King had not previously seen a cardiologist when he went to Dr. Crittenden in September of 2010; he was a new patient. CP-R 243. King reported chest pain that occurred with stress, "of which

he has a significant amount.” CP-R 243. King’s intake summary continues:

His stress is related to professional issues. His business partner hired a hit man to kill him in an attempt to collect the life insurance. There is now a criminal investigation going on and most of the professional work at his clinic has now been dumped on him. As well, he has to deal with the partner who is still part of the practice.

CP-R 243. In the final assessment and plan, three weeks later, the doctor states:

[King] initially presented with occasional chest tightness secondary to extreme stress in his life. Apparently his business partner hired a hit man to kill him.

CP-R 245. But for his business partner soliciting an employee of their business to hire hit men to murder King, and attempting to follow through with that planned murder, none of the stressors listed would exist.

This case is distinguishable from State v. Vinyard, 50 Wn. App. 888, 751 P.2d 339 (1988), upon which Mockovak relies. In Vinyard, the court found inadequate evidence of causation where no evidence was offered relating to why the child victim needed psychological treatment; no evidence suggested that it was related

in any way to the child's abduction.⁵ Id. at 893. The court disapproved of an award for attorney fees incurred in hearings unrelated to the crime. Id. at 894. Notably, in that case the court held that an award of attorney fees would be appropriate if they were incurred in locating or returning the child or causally related to the actual crime. Id. at 894-95.

There is no authority for the proposition that treatment required due to an increase in stress during the course of criminal proceedings is not causally related to the crime. The courts are not well-suited to distinguishing relative effects of multiple stressors on a particular victim. Discussions of the stress of trial in the counseling sessions of a sexual abuse victim would not be excluded from a restitution award for that victim's counseling expenses.

Mockovak appears to trivialize the "but for" causation analysis that has been adopted by the Washington Supreme Court and was relied upon by the State in the trial court, comparing it to a nursery rhyme. App. Br. at 27 n. 8. What Mockovak refers to as a nursery rhyme is also characterized as a proverb teaching that a

⁵ State v. Bunner, 86 Wn. App. 158, 936 P.2d 419 (1997), cited by Mockovak, also found a lack of proof of a causal connection when absolutely no evidence was presented to establish such a connection.

small action can result in much more serious consequences. The far-reaching effects of crimes against persons are all too real. An attempted murder is a much more serious initiating event than a badly-shoed horse, and its consequences in this case are extensive.

Mockovak implies that the “direct result” standard is a more demanding standard than proximate cause. App. Br. at 27 n. 8. The “direct result” language has been interpreted as a “but for” standard, however, the same standard for a cause in fact that is applied in the definition of proximate cause. Hartley v. State, 103 Wn.2d 768, 777-78, 698 P.2d 77 (1985). When Mockovak begins his progression with Mockovak’s commission of these crimes and ends it with King’s medical expenses, he proves the point that but for the crimes, King would not have incurred the expenses. Whether the expenses are so attenuated from the crime that they should not be compensated because they are not reasonable is a matter for resolution by the trial court.

Further, Mockovak’s attempts to minimize the seriousness of the crime and thus the legitimacy of King’s stress also are unpersuasive. Mockovak was arraigned on November 18, 2009; King was present and described his fear of Mockovak. 1RP 21-22.

Mockovak posted two million dollars bail on December 7, 2009, and remained in the community until he was convicted on February 3, 2011, and taken into custody. Supp CP ___ (sub 12, Bonds received, 12/7/2009); 19RP 9-10. Likewise, Mockovak's argument that King was in no real danger falls flat, as Mockovak had every intention of having King killed, and King could not know what other methods Mockovak might resort to in order to accomplish his intended result.

3. THE TRIAL COURT PROPERLY EXERCISED ITS DISCRETION IN ORDERING RESTITUTION FOR THE PORTION OF THE MEDICAL EXPENSES THAT WAS PAID BY KING'S INSURER.

Mockovak asserts that the trial court improperly ordered restitution for the amount of the full medical bill because King paid only \$837.64, and King's insurer paid the remainder. The court properly ordered the entire amount incurred.

The statute limits restitution for injury to persons to actual expenses incurred. RCW 9.94A.753(3). Because King was liable for these medical expenses, they were expenses he incurred and so met the statutory definition. To the extent that the insurer paid King's expenses, it also is considered a victim of the crime that can

recover restitution. State v. Ewing, 102 Wn. App. 349, 352, 7 P.3d 835 (2000).

The trial court indicated at the September hearing that it intended to double the amount of the medical costs if they were recoverable, because the court believed that the narrow reading of the restitution statute prevented King from recovering his other losses that were related to the crimes. 21RP 30. The court indicated that it would double the amount for that equitable reason. 21RP 30. The court's expressed curiosity about how that award would be treated in the appellate courts does not negate the justification that he proffered. Double the amount of the medical expenses actually paid by King would be \$1695.28 (two times the sum of \$837.64 plus \$10).

The court apparently chose to simply award King restitution in the amount of the total bill for the medical expenses instead, although that was several hundred dollars less than the maximum permissible amount. No findings are required by the court. The court's decision to award a higher amount than the actual cost to King was a considered response to the disproportion of the restitution that could be ordered and the losses King suffered.

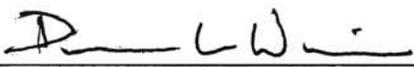
F. CONCLUSION

For the foregoing reasons, the State respectfully asks this Court to affirm the restitution previously ordered in the amount of \$1543.34, reverse the legal conclusions reached by the trial judge as to the limited availability of restitution, and remand for fact finding as to the total amount of restitution owed.

DATED this 15TH day of October, 2012.

Respectfully submitted,

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Certificate of Service by Mail

Today I deposited in the mail of the United States of America, postage prepaid, a properly stamped and addressed envelope directed to James E. Lobsenz, the attorney for the appellant, at Carney Badley Spellman, P.S., 701 Fifth Avenue, Suite 3600, Seattle, WA 98104-7010, containing a copy of the Brief Of Respondent/ Cross-Appellant , in STATE V. MICHAEL MOCKOVAK, Cause No. 68020-0-1, in the Court of Appeals, Division I, for the State of Washington.

I certify under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct.



Name
Done in Seattle, Washington

10-15-12
Date