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STATE OF WASHINGTON
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State of Washington
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SUPREME COURT NO. 102500-9

NO. 84692-2-I

SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

SIMÓN CRUZ AMADO,

Petitioner.

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR SKAGIT COUNTY

The Honorable Thomas Verge, Judge

PETITION FOR REVIEW

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A. PETITIONER & COURT OF APPEALS DECISION

Petitioner Simón Cruz Amado (Cruz) seeks review of the Court of Appeals' October 2, 2023 unpublished decision in State v. Cruz Amado, which is appended to this Brief. ("App.").

B. ISSUES PRESENTED FOR REVIEW

1. Under the Sentencing Reform Act, for purposes of offender score calculation, a prior class C felony conviction washes out—is no longer countable—after five years spent out of incarceration pursuant to a felony and where no new crime is committed in those five years. Cruz had a 2013 class C conviction. The incident in this case occurred in 2015, and a warrant was issued, but Cruz was not arrested and tried for the crimes until 2022. Meanwhile the State did not prove Cruz was incarcerated or committed any crime between 2015 and 2022. Based on the plain language of the SRA, did the trial court erroneously count the 2013 conviction?

2. Did the trial court and Court of Appeals improperly shift the burden to Cruz to prove that he merited washout of his

convictions under the plain language of the statute, and erroneously apply the doctrine of absurd results, where the statute's plain language does not produce an absurd result?

C. STATEMENT OF THE CASE[1]

The State charged Cruz with first degree assault, first degree burglary, and felony violation of a no-contact order (VNCO), all while armed with a deadly weapon, and all alleged to be domestic violence offenses. The charges arose from a March 2015 incident involving Cruz's ex-wife, T.G. CP 16-18.

According to trial testimony, the day in question, Cruz arrived at T.G.'s residence in Skagit County for the first time in almost two years. 1RP 220-21. Cruz and T.G. argued, and Cruz followed T.G. outside when she left to pick up T.G. and Cruz's middle son at a friend's house. 1RP 222-24. Cruz stabbed T.G. but ran away when she screamed. 1RP 227-28. T.G. was

[1] This petition refers to the verbatim reports as follows: 1RP – 10/3 through 10/6/2022; 2RP – 10/7 and 11/9/2022; and 3RP – 10/7/2022 (jury questions and verdicts). The first two volumes are consecutively paginated.

wounded, but the wounds were not life-threatening. 1RP 378. T.G. and Cruz's oldest and youngest sons, then 18 and not yet two years old, were inside the residence and did not see the incident. 1RP 286-87.

Significant to the sentencing issues in this case, the court issued an arrest warrant shortly after the March 2015 incident, but police did not arrest Cruz on the related charges until April of 2022. CP 131.

Following an October 2022 trial, a jury convicted Cruz of the lesser degree offenses of second degree assault and residential burglary, as well as the charged no-contact order violation. CP 106-08. The jury's verdicts indicated the offenses met the definition of domestic violence offenses, but the jury did not return verdicts on the deadly weapon allegations. CP 109; 3RP 14.

At sentencing, the trial court found the assault and VNCO convictions were the same criminal conduct and scored as one conviction. CP 116. But the court counted toward Cruz's

offender score a 2013 felony harassment conviction, determining the crime did not wash out between 2015 and 2022, resulting in offender scores of three, four, and three on Counts 1 through 3. 2RP 550-51; CP 117; former RCW 9.94A.525(21)(a) (2013). The court imposed high-end standard range sentences on each count (and ran the sentences concurrently) resulting in a total sentence of 20 months of incarceration. CP 117-18; RCW 9.94A.510; former RCW 9.94A.515 (2013).

Cruz Amado appealed to Division One of the Court of Appeals, arguing in part that the 2013 conviction should have washed out under the plain language of the SRA.

The Court of Appeals affirmed an unpublished decision, stating

> We are not persuaded by [Cruz's] attempt to extend [State v. Ervin, 169 Wn.2d 815, 239 P.3d 354 (2010)] and [State v. Schwartz, 6 Wn. App. 2d 151, 429 P.3d 1080 (2018), aff'd, 194 Wn.2d 432, 450 P.3d 141 (2019)] to the circumstances here. We have found no case, and [Cruz], cites none, where Ervin or was applied to a five-year period where a defendant is actively avoiding arrest. As the State correctly points out, [Cruz's] interpretation creates

> an absurd scenario—a defendant's offender score would go down if he intentionally flees a jurisdiction and avoids arrest for the requisite period. This is an absurd result and a result the legislature did not intend.

App. at 5.

Cruz now asks that this Court grant review on this issue and reverse.

D. REASONS REVIEW SHOULD BE GRANTED

1. **This Court should grant review under RAP 13.4(b)(1) and (2).**

Review is appropriate under RAP 13.4(b)(1) and (2) because the decision conflicts with decisions from this Court and from the Court of Appeals.

2. **The 2013 conviction washed out under the plain language of the SRA.**

The 2013 felony harassment conviction washed out. The trial court and Court of Appeals' decisions appear to place the onus on to Cruz to demonstrate he deserves to the have the plain language of the SRA to apply to him. Moreover, the result produced by the SRA's plain language is not absurd and is the

correct result in the present case. This Court should grant review on this significant statutory issue.

Interpretation of the SRA's washout provision is a matter of statutory interpretation, which this Court reviews de novo. Ervin, 169 Wn.2d at 820. When interpreting a statute, this Court gives effect to the statute's plain meaning when it can be determined from the statute's text. State v. Marquette, 6 Wn. App. 2d 700, 703, 431 P.3d 1040 (2018).

The State bears the burden of proving an offender's prior criminal history by a preponderance of the evidence. State v. Hunley, 175 Wn.2d 901, 909-10, 287 P.3d 584 (2012). This includes the burden to prove that prior convictions have not washed out for the purpose of calculating a defendant's offender score. In re Pers. Restraint of Cadwallader, 155 Wn.2d 867, 876-78, 123 P.3d 456 (2005).

Here, Cruz pleaded guilty to felony harassment, a class C felony, in February of 2013, and the court sentenced him to 40

days of incarceration and no community custody. CP 138-47; RCW 9A.46.020(2)(b).

Meanwhile, RCW 9.94A.525 provides the road map for calculating an offender score, including the "washout" of prior convictions, i.e., removal from inclusion in an offender score. Under RCW 9.94A.525(2)(c), "class C prior felony convictions other than sex offenses shall not be included in the offender score if, [1] since the last date of release from confinement (including full-time residential treatment) pursuant to a felony conviction, if any, or entry of judgment and sentence, [2] the offender had spent five consecutive years in the community without committing any crime that subsequently results in a conviction." Further, the washout period need not immediately follow the relevant event. "Any five-year period will do, so long as it follows the date of entry of judgment and the last date of release from confinement for the prior offense." Schwartz, 6 Wn. App. 2d at 158.

As suggested by the inserted numbering, this Court has broken the provision into two clauses: First, a "'trigger[]'" clause, which identifies the beginning of the five-year period; and second, a "continuity/interruption" clause, which sets forth the substantive requirements an offender must satisfy during the five-year period to avoid interruption. Ervin, 169 Wn.2d at 821 (quoting In re Pers. Restraint of Nichols, 120 Wn. App. 425, 432, 85 P.3d 955 (2004)).

For purposes of the SRA, "one is 'in the community' when not in confinement." Rockafellow v. State, noted at 13 Wn. App. 2d 1125, 2020 WL 3969401, *2 (unpublished decision cited as persuasive authority under GR 14.1). "Confinement" generally means "total or partial confinement." RCW 9.94A.030(8).

Moreover, the concept of "confinement" is even more circumscribed for the purpose of washout. In Ervin, this Court, analyzing what sort of event would interrupt the five-year period, stated, "we hold that time spent in jail pursuant to violation of probation stemming from a misdemeanor does not interrupt the

washout." Ervin, 169 Wn.2d at 826. In contrast, confinement stemming from a felony would reset the "trigger" date. Id. at 825; State v. Blair, 57 Wn. App. 512, 515-17, 789 P.2d 104 (1990); State v. Perencevic, 54 Wn. App. 585, 774 P.2d 558 (1989); cf. State v. Schwartz, 194 Wn.2d 432, 438, 450 P.3d 141 (2019) (jail time as a sanction for failing to pay felony legal financial obligations does not interrupt the five-year washout period).

In the present case, turning first to "trigger" analysis, the starting event is Cruz's release on the 2013 conviction, which, based on the 40-day sentence, occurred in early 2013. CP 138-78. As for the second consideration, continuity/interruption, the sole question is whether, for some five-year period following release on the 2013 conviction, Cruz "spent five consecutive years in the community without committing any crime that subsequently results in a conviction." RCW 9.94A.525(2)(c). It is the State's burden to prove that Cruz did not. Cadwallader, 155 Wn.2d at 876-78. Put another way, the trial court needed to

presume Cruz remained in the community, that is, out of confinement, between March 2015, the date of the current crimes, and his 2022 incarceration on those crimes. That is because the State, the party with the sole burden, presented no information to the contrary.

The State argued only that there was a warrant for Cruz's arrest during that time, and therefore washout of the 2013 conviction would be an "absurd" result. CP 153 (citing non-SRA decision). The State repeated this argument in the Court of Appeals, and the Court of Appeals appears to simply have accepted it, not even citing an analogous decision. App. at 5.

But the absurd results doctrine does not apply in the present case. The doctrine does not give a court license to "do[] violence" to the language of statutes. See State v. Hall, 168 Wn.2d 726, 737, 230 P.3d 1048 (2010). The spirit of a legislative enactment should apply over "express but inept wording," State v. Burke, 92 Wn.2d 474, 478, 598 P.2d 39 (1979); but there is no claim of inept wording here.

And, in any event, washout is consistent with the purposes of the SRA. The legislature intended that class C convictions eventually wash out. "Class C felony convictions are intended to 'eventually wash out and be eliminated from the Offender Score.'" Schwartz, 194 Wn.2d at 443 (quoting WASH. SENTENCING GUIDELINES COMM'N, ADULT FELONY SENTENCING MANUAL 1984, at II-34). Even though Cruz committed a crime in 2015, the State did not demonstrate that he subsequently committed any other crime leading to conviction. Had Cruz served time in jail or prison for, for example, violating the terms of his 2013 felony sentence, or committed some other crime, then that term of confinement could have interrupted the five-year washout period. See Ervin, 169 Wn.2d at 825-27. But the State did not present any information that Cruz was ever sentenced to confinement after early 2013 or that he committed any crime after 2015.

Many people with warrants commit new crimes or are confined while the warrant is pending, and their convictions do

not wash out. It is not absurd that a person who does *not* commit a new crime and is not confined during a five-year period would have their class C conviction wash out.

The trial court and Court of Appeals improperly placed the onus on Cruz to demonstrate he was worthy of washout under the SRA and incorrectly determined Cruz's plain reading of the statue produced absurd results. This Court should grant review to clarify that the plain language of the SRA does not, under the circumstances, produce absurd results, and washout was proper.

E. CONCLUSION

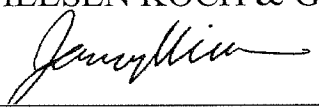
This Court should grant review under RAP 13.4(b)(1) and (2) and reverse.

I certify this document was prepared in 14-point font and contains 1,965 words excluding those portions exempt under RAP 18.17.

DATED this 20th day of October, 2023.

Respectfully submitted,

NIELSEN KOCH & GRANNIS



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APPENDIX

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IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent, v. SIMON GERARDO CRUZ-AMADO, Appellant.	No. 84692-2-I DIVISION ONE UNPUBLISHED OPINION

MANN, J. — Simon Gerardo Cruz-Amado was convicted of assault in the second degree, residential burglary, and violation of a no-contact order. Cruz-Amado argues that the sentencing court erred by miscalculating his offender score and by entering a no-contact order that prohibits him from entering Skagit County. In addition, Cruz-Amado argues that the victim penalty assessment (VPA) should be stricken from the judgment and sentence based on recent statutory amendments. We affirm in part, reverse in part, and remand.

I

On March 22, 2015, Cruz-Amado stabbed his then wife, T.G., outside of her home. Two of their three children were inside the home at the time. Cruz-Amado fled

the scene. T.G. had seven stab wounds to her chest, abdomen, upper shoulders, and arms. At the time of the assault, an active no-contact order was in place protecting T.G. from Cruz-Amado.

Cruz-Amado was charged with assault in the first degree against a family or household member. An arrest warrant was issued on March 26, 2015. But Cruz-Amado fled the jurisdiction, and, despite a nationwide arrest warrant, he was not arrested until April 20, 2022.

The case proceeded to trial by amended information charging Cruz-Amado with assault in the first degree, burglary in the first degree, and assault in violation of a no-contact order, all with domestic violence allegations. A jury found Cruz-Amado guilty of the lesser included crime of assault in the second degree, residential burglary, and violation of a no-contact order. By special verdict, the jury also found that Cruz-Amado and T.G. were members of the same household at the time of the commission of the crime.

At sentencing, the State presented evidence of Cruz-Amado's 2013 conviction of harassment, a class C felony. In that case, the court sentenced him to 40 days confinement with no community custody and ordered him to have no contact with T.G. for five years.

The State argued that the 2013 conviction counted toward Cruz-Amado's offender score because he did not have a five-year crime-free period prior to the commission of this offense. Cruz-Amado argued that the conviction washed out because he was in the community not in confinement between March 22, 2015 until his arrest in April 2022.

The trial court ruled that the 2013 felony did not wash out and included it in Cruz-Amado's offender score. Cruz-Amado received a standard range sentence of 20 months. The trial court also entered a postconviction domestic violence no-contact order preventing Cruz-Amado from contacting T.G. for 10 years. The no-contact order also prohibits Cruz-Amado from entering Skagit County, where T.G. resides.

Cruz-Amado appeals.

II

Cruz-Amado argues the trial court improperly calculated his offender score because it included a 2013 felony harassment conviction that had washed out. We disagree.

The Sentencing Reform Act of 1981 (SRA), chapter 9.94A RCW, expressly requires the State to not consider some felony convictions in an offender score under some circumstances. The "Offender score" statute provides:

> class C prior felony convictions other than sex offenses shall not be included in the offender score if, since the last date of release from confinement (including full-time residential treatment) pursuant to a felony conviction, if any, or entry of judgment and sentence, the offender had spent five consecutive years in the community without committing any crime that subsequently results in a conviction.

RCW 9.94A.525(2)(c).

RCW 9.94A.525(2)(c) is split into two separate clauses, a trigger clause "which identifies the beginning of the five-year [washout] period," and a continuity/interruption clause, "which sets forth the substantive requirements an offender must satisfy during the five-year period." State v. Ervin, 169 Wn.2d 815, 821, 239 P.3d 354 (2010).

Statutory interpretation is a question of law reviewed de novo. In re Det. of Williams, 147 Wn.2d 476, 486, 55 P.3d 597 (2002). "The court's paramount duty in statutory interpretation is to give effect to the legislature's intent." In re Pers. Restraint of Nichols, 120 Wn. App. 425, 431, 85 P.3d 955 (2004). The surest indication of legislative intent is the language enacted by the legislature, so if the meaning of a statute is plain on its face, we "'give effect to that plain meaning.'" State v. Jacobs, 154 Wn.2d 596, 600, 115 P.3d 281 (2005) (quoting Dep't of Ecology v. Campbell & Gwinn, LLC, 146 Wn.2d 1, 9, 43 P.3d 4 (2002)). "[W]e presume the legislature does not intend absurd results." Ervin, 169 Wn.2d at 823.

The plain language of the statute states, "the offender had spent five consecutive years in the community without committing any crime that subsequently results in a conviction." RCW 9.94A.525(2)(c) (emphasis added). Here, the parties agree that the triggering event was Cruz-Amado's release for felony harassment in early 2013. Cruz-Amado did not spend five years in the community without committing any crime. From his release in early 2013, to the assault of T.G. on March 22, 2015, at most two years had passed. And that crime subsequently resulted in a conviction.

Cruz-Amado instead asserts that the time period after his assault on T.G., from 2015 to his arrest in April 2022, should be considered the washout period.

Cruz-Amado relies on Ervin, 169 Wn.2d 815, and State v. Schwartz, 6 Wn. App. 2d 151, 429 P.3d 1080 (2018), aff'd, 194 Wn.2d 432, 450 P.3d 141 (2019). In Ervin, the State and defense counsel disagreed on whether the 17 days Ervin spent in custody for a misdemeanor probation violation interrupted the 5-year washout period. 169 Wn.2d at 818. Our Supreme Court held that "time spent in jail pursuant to violation of probation

stemming from a misdemeanor does not interrupt the wash-out period." Ervin, 169 Wn.2d at 826.

In Schwartz, during a 2017 sentencing, Schwartz's criminal history was presented and included a 1997 crime of forgery and a 2001 crime of failure to register as a sex offender. 6 Wn. App. 2d at 153-54. Schwartz argued that both the 1997 and 2001 class C felony convictions washed out because he was crime free between 2006, his last day of confinement for the 2001 crime, and 2013. Schwartz, 6 Wn. App. 2d at 154, 157. The Court of Appeals agreed, explaining, "[a]ny five-year period will do, so long as it follows the date of entry of judgment and the last date of release from confinement for the prior offense." Schwartz, 6 Wn. App. 2d at 158.

We are not persuaded by Cruz-Amado's attempt to extend Ervin and Schwartz to the circumstances here. We have found no case, and Cruz-Amado, cites none, where Ervin or Schwartz was applied to a five-year period where a defendant is actively avoiding arrest. As the State correctly points out, Cruz-Amado's interpretation creates an absurd scenario—a defendant's offender score would go down if he intentionally flees a jurisdiction and avoids arrest for the requisite period. This is an absurd result and a result the legislature did not intend. The trial court did not err.

III

Cruz-Amado argues that a provision of the no-contact order prohibiting him from entering Skagit County was insufficiently tailored to meet the State's objectives.[1] We agree.

[1] Cruz-Amado is also prohibited from entering Skagit County during the period of community custody supervision. However, Cruz-Amado only challenges the no-contact order.

The SRA permits trial courts to impose "crime-related prohibitions" such as no-contact orders when sentencing defendants. State v. Armendariz, 160 Wn.2d 106, 120, 156 P.3d 201 (2007). "Crime-related prohibitions" are orders directly related "to the circumstances of the crime." RCW 9.94A.030(10). We review sentencing conditions for an abuse of discretion. State v. Warren, 165 Wn.2d 17, 32, 195 P.3d 940 (2008). Conditions are usually upheld if reasonably crime related. Warren, 165 Wn.2d at 32.

However, more careful review of sentencing conditions is required where those conditions interfere with a fundamental constitutional right. Warren, 165 Wn.2d at 32. Such conditions must be reasonably necessary to accomplish the essential needs of the State and public order and must be sensitively imposed. Warren, 165 Wn.2d at 32. Under this standard, the court examines whether the sentencing condition (1) furthers a compelling state interest and (2) is reasonably necessary in scope and duration. In re Pers. Restraint of Rainey, 168 Wn.2d 367, 377, 381, 229 P.3d 686 (2010). "The extent to which a sentencing condition affects a constitutional right is a legal question subject to strict scrutiny." Rainey, 168 Wn.2d at 374. Nevertheless, because the determination to impose a crime-related prohibition is "necessarily fact-specific" and is "based upon the sentencing judge's in-person appraisal of the trial and the offender, the appropriate standard of review remains abuse of discretion." Rainey, 168 Wn.2d at 374-75.[2]

[2] Cruz-Amado argues that this court applies strict scrutiny in reviewing orders banishing a person from a county and cites State v. Schimelpfenig, 128 Wn. App. 224, 115 P.3d 338 (2005). But Schimelpfenig was criticized by In re Pers. Restraint of Winton, 196 Wn.2d 270, 275, 474 P.3d 532 (2020). Like the no-contact order in this case, Winton considered a "crime-related prohibition." 196 Wn. 2d at 276. And Rainey considered a no-contact order. 168 Wn.2d at 374. Thus, the test applied in Schimelpfenig is not appropriate in this case.

Cruz-Amado argues that there are less restrictive means to serve the State's needs and protect T.G. than prohibiting him from entering Skagit County. In support, Cruz-Amado first cites State v. Alphonse, 147 Wn. App. 891, 897-98, 197 P.3d 1211 (2008), where after Alphonse was convicted of felony and misdemeanor telephone harassment, the trial court ordered Alphonse not to appear in the city limits of Everett unless required for legal or judicial reasons. On appeal, this court vacated the order, holding there were less restrictive means to serve the court's stated purpose including an order restricting contact with the victims or requiring Alphonse to stay a specified distance from them. Alphonse, 147 Wn. App. at 910-11.

Cruz-Amado next cites Schimelpfenig, 128 Wn. App. 224, 225, 115 P.3d 338 (2005), where, as part of his sentence for first degree murder, the trial court ordered Schimelpfenig not to reside in Grays Harbor County or have any contact with members of the victim's family. The appellate court vacated the order, holding that a more narrowly tailored restriction would protect the victim's family from being reminded of their loss. Schimelpfenig, 128 Wn. App. at 230. But the court also noted, "we do not imply that countywide or other types of jurisdictional prohibitions will always be inappropriate." Schimelpfenig, 128 Wn. App. at 230.

In this case, the no-contact order prohibiting Cruz-Amado from entering Skagit County is to protect T.G. Generally, the State has a compelling interest in preventing future harm to the victims of crime. Rainey, 168 Wn.2d at 377. T.G. resides in Skagit County. And Cruz-Amado has shown that he is not deterred by a standard no-contact order as one was in place when he attacked T.G. in 2015.

Cruz-Amado proposes that he be allowed to travel through Skagit County without stopping or that the prohibition apply only as long as T.G. resides in the county. The State agrees that both suggestions could be legally implemented if this case is remanded. Skagit County sits on Interstate-5, the major north-south interstate highway in Washington, the county extends west to the Salish sea and east to the Cascade mountains. Avoiding the county to travel North would take a significant amount of time and, depending on the season, could be impossible. Thus, this provision of the no-contact order is not reasonably necessary in scope.

Given the fact-specific nature of the inquiry, we remand for resentencing, so that the sentencing court may address the parameters of the no-contact order under the "reasonably necessary" standard. Rainey, 168 Wn.2d at 377.

IV

In a motion submitted after his opening brief, Cruz-Amado argues that the VPA should be stricken from the judgment and sentence based on recent statutory amendments. The State did not respond to Cruz-Amado's motion.

The VPA was recently addressed in State v. Ellis, __ Wn. App. __, 530 P.3d 1048, 1057 (2023). There, Division Two of this court observed that:

> ESHB [Engrossed Substitute H.B.] 1169 added a subsection to RCW 7.68.035 that prohibits courts from imposing the VPA on indigent defendants as defined in RCW 10.01.160(3). LAWS OF 2023, ch. 449 § 1; RCW 7.68.035(4). The amended statute also requires trial courts to waive any VPA imposed prior to the effective date of the amendment if the offender is indigent, on the offender's motion. LAWS OF 2023, ch. 449 § 1; RCW 7.68.035(5)(b). This amendment will take effect on July 1, 2023. LAWS OF 2023, ch. 449 § 1.

Ellis, 530 P.3d at 1057. The new provision applies to cases pending direct appeal. Ellis, 530 P.3d at 1057 (citing State v. Ramirez, 191 Wn.2d. 732, 748-49, 426 P.3d 714 (2018)). We agree. Because the court found Cruz-Amado indigent, the VPA should be stricken on remand.

Affirmed in part, reversed in part, and remanded.

Mann, J.

WE CONCUR:

Birk, J.

Dwyer, J.

NIELSEN KOCH & GRANNIS P.L.L.C.

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