NO. ___
(COA NO. 39254-6-III)

THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

MIGUEL TORRES,

Petitioner.

FROM THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR BENTON COUNTY

PETITION FOR REVIEW

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A. IDENTITY OF PETITIONER

Petitioner Miguel Torres asks this Court for review.

B. COURT OF APPEALS DECISION

Mr. Torres seeks review of the Court of Appeals's opinion in *State v. Torres*, No. 39254-6-III (Wash. Ct. App. Mar. 4, 2025).

C. ISSUE PRESENTED FOR REVIEW

This Court's precedent makes clear that evidence of gang membership is highly prejudicial. Here, the prosecution offered evidence Mr. Torres went by the nickname "Crook," displayed tattoos during the alleged crime, and called himself a "southsider." This evidence was irrelevant to prove Mr. Torres's identity, which was undisputed. Nevertheless, the Court of Appeals upheld admission of this minimally probative, highly prejudicial evidence, contrary to precedent. This Court should grant review. RAP 13.4(b)(1).

D. STATEMENT ●F THE CASE

Mr. Torres recounts the facts of this case more fully in his brief of appellant. Br. of App. at 5–16.

Mr. Torres was friends with Chris Hammond and Danny Phipps. RP 688–89. Mr. Phipps lived in Mr. Hammond's garage. RP 143. Tim Cottrell often visited Mr. Hammond and Mr. Phipps while on a break from his job to "get high." RP 147–48, 210, 212.

●ne evening, Mr. Torres visited Mr. Hammond's garage. RP 694. Mr. Hammond and Mr. Phipps were there, and Mr. Cottrell arrived a few minutes later. RP 696. Mr. Phipps, Mr. Cottrell, and Mr. Torres began to smoke methamphetamine. RP 697.

Mutual acquaintance Tawny Scully arrived later. RP 700. Ms. Scully smoked methamphetamine with the others. RP 701. When the methamphetamine ran out, Ms. Scully said she had a handgun she could trade for

drugs, and Ms. Torres said he knew someone willing to trade. RP 701–02. Mr. Torres, Ms. Scully, and Mr. Cottrell left the garage to retrieve Ms. Scully's gun from a storage unit. RP 702–03, 706–07.

When they arrived at the storage facility, Mr. Cottrell opened the entrance gate. RP 707. Mr. Cottrell unlocked the storage unit, and Ms. Scully entered. RP 707–08. She retrieved a box and took a handgun from it. RP 709. Mr. Torres examined the gun, returned it to Ms. Scully, and assured her he could trade it. RP 710.

Mr. Torres's car would not start. RP 714. Ms. Scully walked through the facility's exit gate and left, while Mr. Torres and Mr. Cottrell tried unsuccessfully to push the car. RP 715. The two men climbed the fence instead. RP 716–18.

Later, Ms. Scully met up with Mr. Torres to trade the gun. RP 722–23. Ms. Scully drove with Mr. Torres

to another city to meet Mr. Torres's friend, who took the gun in exchange for methamphetamine. RP 723, 727–28. Ms. Scully drove Mr. Torres back, and they went their separate ways. RP 729–30.

Ms. Scully's, Mr. Phipps's, and Mr. Cottrell's testimony differed from Mr. Torres's account in many respects. Ms. Scully said Mr. Phipps called her and asked her to go to Mr. Hammond's garage. RP 541. When Ms. Scully arrived, Mr. Torres was there. RP 543. Ms. Scully claimed Mr. Torres then struck her with a gun and pushed the gun into her mouth. RP 545–46. She said she had $6,000 in cash in her storage unit, and Mr. Torres demanded that she go with him to the facility and give him the money. RP 539–40, 552.

At the garage, Ms. Scully said she retrieved a box containing the cash, as well as keepsakes from her late husband. RP 539–40, 566. She handed the cash and the

box to Mr. Torres. RP 566. She later heard Mr. Cottrell ended up with the box. RP 567. Ms. Scully recalled Mr. Cottrell unlocked the storage unit. RP 564. She claimed she ran out of the exit gate. RP 570.

Mr. Phipps said he, Mr. Hammond, and Mr. Cottrell were in the garage when Mr. Torres arrived. RP 152. Mr. Torres pushed a gun into Mr. Phipps's mouth and told him to call Ms. Scully and get her to come to the garage. RP 154–55. Mr. Phipps did so. RP 157. No other witness saw this assault. RP 243, 620.

Mr. Cottrell said Mr. Torres looked "familiar" but he was not sure he recognized him. RP 213. He claimed someone he "believe[d] . . . may have been" Mr. Torres was already at the garage when he arrived. RP 220. He admitted going to the storage facility with Mr. Torres and Ms. Scully, opening the gate, unlocking the storage unit, and even chasing Ms. Scully when she did not

return. RP 229–30, 232–33, 235. He claimed he did these things only because Mr. Torres pointed the gun at him in the garage. RP 228, 230, 260. No other witness saw Mr. Torres do this. RP 165, 620.

All three alleged victims denied knowing Mr. Torres. RP 150, 213, 220, 533.

The prosecution charged Mr. Torres with second-degree assault, first-degree kidnapping, and first-degree robbery as to Ms. Scully; second-degree assault and first-degree kidnapping as to Mr. Cottrell; second-degree assault as to Mr. Phipps; and second-degree unlawful possession of a firearm. CP 18–22. All but the possession count carried firearm enhancements. *Id.*

At the trial, the prosecution offered evidence that Mr. Torres's nickname is "Crook" and that he displayed tattoos and shouted about the "southside" in Mr. Hammond's garage. RP 32, 240–41. Mr. Torres

objected, arguing this evidence of gang affiliation was irrelevant and invited the jury to infer a propensity to criminality. CP 28; RP 241. The trial court reasoned ER 403 and ER 404(b) do not apply to statements of a party opponent and Mr. Torres waived any objection under these rules by the act of being known as "Crook." RP 31–33. It admitted the evidence. RP 33, 241.

The jury acquitted Mr. Torres of the assault and kidnapping counts against Mr. Cottrell. CP 93, 95. It otherwise convicted him as charged. CP 87–92, 97–99.

The trial court sentenced Mr. Torres based on an offender score that included three prior convictions of possessing a controlled substance, an additional point for committing the current offense while on community custody, and an Idaho conviction of methamphetamine trafficking. CP 104, 112. On appeal, Mr. Torres argued, and the prosecution conceded, that (1) the possession

convictions are void per *State v. Blake*, 197 Wn.2d 170, 481 P.3d 521 (2021); (2) the community custody point was premised on a void conviction and is also void; and (3) the Idaho conviction is not legally comparable to a Washington offense. Slip op. at 8. The Court of Appeals accepted the prosecution's concessions. *Id.* at 8–9.

Mr. Torres also argued, and the prosecution conceded, that his conviction of second-degree assault against Ms. Scully merges into his conviction of first-degree kidnapping. Slip op. at 7–8. The Court of Appeals accepted this concession. *Id.* at 8. It remanded for resentencing and to determine whether the Idaho conviction is factually comparable. *Id.* at 9–10.

In addition to these issues, Mr. Torres argued that the trial court erred in admitting evidence of gang affiliation. Br. of App. at 17–33. The Court of Appeals disagreed and affirmed his convictions. Slip op. at 7.

E. ARGUMENT

In upholding admission of marginally relevant, highly prejudicial gang evidence, the Court of Appeals contravened this Court's precedent.

Evidence suggesting Mr. Torres is affiliated with a gang is highly prejudicial. *State v. Juarez DeLeon*, 185 Wn.2d 478, 490–91, 374 P.3d 95 (2016). Such evidence paints Mr. Torres as "part of a pervasive gang problem" and "a criminal-type person who would be likely to commit the crime charged." *Id.*; *State v. Foxhoven*, 161 Wn.2d 168, 175, 163 P.3d 786 (2007).

Gang evidence takes on an extra dimension of prejudice for a person of color like Mr. Torres. Police more often perceive people of color as gang members than white people. Beth Caldwell, *Reifying Injustice: Using Culturally Specific Tattoos as a Marker of Gang Membership*, 98 Wash. L. Rev. 787, 802–03 (2023). People perceive Latinos in particular as gang members,

and police categorize culturally significant tattoos—such as Mayan or Aztec symbols—as evidence of gang affiliation. *Id.* at 814–15, 820.

Courts assume Eastern Washington jurors are at least somewhat familiar with how police in the area classify Latino gangs. *See State v. Crump*, No. 38963-4-III, 2024 WL 340815, at *3 (Wash. Ct. App. Jan. 30, 2024) (unpub.) (jurors likely recognize "red is a color associated with the Norteños street gang").

Here, the prosecution offered three lines of gang evidence—Mr. Torres's nickname, "Crook"; that he showed tattoos inside the garage; and that he referred to the "southside" or being a "southsider" at the same time. RP 32, 161, 240–41. The prosecution argued the "Crook" nickname bore on identity because Mr. Cottrell knew his assailant by it. RP 241. It did not explain why displaying the tattoo and "southsider" remark were

relevant, except that they "happened during the course of the assault." RP 32.

The prejudice is obvious. "Crook" is a synonym for "criminal." In addition, that Mr. Torres was a Latino accused of violent crimes would have led at least some jurors to believe the name was gang related. Caldwell, *supra*, at 814–15.

The same is true of evidence Mr. Torres showed his tattoos and announced he is a "southsider." RP 161. The jury would likely suspect Mr. Torres is a Sureño—i.e., a member of a Latino gang police describe as arising in southern California. *See* Richard Valdemar, *Sureño Tattoos and Symbols*, PoliceMag.com (Mar. 2, 2010).[1] Likewise, the jurors would assume Mr. Torres displayed his tattoos as evidence of gang membership,

[1] https://www.policemag.com/blogs/gangs/blog/15318271/sureo-tattoos-and-symbols.

even if they did not recognize his two bars and three dots as the Mayan numeral 13. *Id.*; Caldwell, *supra*, at 820; David Eugene Smith & William Judson LeVeque, *Numeral Systems*, Encyclopædia Britannica[2]; RP 161.

The prosecution's repeated use of the evidence compounded its prejudicial effect. The prosecution offered that Mr. Cottrell knew his assailant as "Crook" to show Mr. Torres's identity after Mr. Cottrell did not identify Mr. Torres in the courtroom. RP 213, 240–41. The prosecution also elicited that Ms. Scully knew of the "Crook" nickname, even after she identified Mr. Torres as her supposed attacker. RP 533–34. And a police detective testified based on his "knowledge" and "position as a detective" that he knows "the name Crook" to be associated with Mr. Torres. RP 415.

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[2] https://www.britannica.com/science/numeral/Numeral-systems.

The Court of Appeals reasoned this evidence was relevant to prove Mr. Torres's identity. Slip. op. at 7. However, its probative value for this purpose was minuscule. Far from "crucial," identity was not at issue—Mr. Torres did not dispute that he went from the garage to the storage facility with Ms. Scully and Mr. Cottrell. *Id.*; RP 694–715. And the risk of unfair prejudice was immense.

The error was not harmless. Mr. Torres's brief of appellant recounts a litany of reasons to doubt the complaining witnesses' accounts of events in the garage and the storage facility. Br. of App. at 27–33. The inadmissible evidence suggesting Mr. Torres was a gang member likely drove the jury to overlook these weaknesses in the prosecution's case and conclude he is a violent person likely to commit the charged crimes.

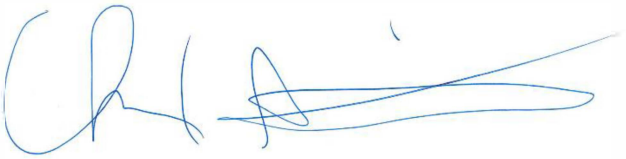
The Court of Appeals's conclusion is contrary to this Court's precedent that evidence of gang affiliation is highly likely to invoke a forbidden propensity inference. *Juarez DeLeon*, 185 Wn.2d at 490–91; *Foxhoven*, 161 Wn.2d at 175. This Court should grant review. RAP 13.4(b)(1).

F. CONCLUSION

This Court should grant review.

Per RAP 18.17(c)(10), the undersigned certifies this petition contains 1,927 words.

DATED this 28th day of March, 2025.



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APPENDIX

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IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION THREE

STATE OF WASHINGTON, Respondent, v. MIGUEL ALEXANDER TORRES, Appellant.	)))))))))	No. 39254-6-III UNPUBLISHED OPINION

LAWRENCE-BERREY, C.J. — Miguel Torres appeals multiple convictions stemming from him threatening two people with a gun, kidnapping one of them, and later robbing her of money. He argues that his convictions should be reversed due to evidentiary error but if reversal is not granted, that one of his convictions should be vacated due to merger, his offender score must be recalculated, and one cost should be struck.

We disagree that evidentiary error occurred. But we conclude (1) one of Torres's assault in the second degree convictions must be vacated due to merger; (2) resentencing and recalculation of Torres's offender score is required for the additional reasons that (a) three unconstitutional convictions must be omitted, (b) the offender point for

committing the offense while on probation must be omitted, and (c) the Idaho trafficking conviction must undergo a factual comparability analysis; and (3) the $500 victim penalty assessment must be struck.

FACTS

Miguel Torres entered a shed where Danny Phipps was living, located on property owned by Chris Hammond. At the time, both Phipps and Hammond were present. Torres put a gun in Phipps's mouth and directed him to call Tawny Scully and ask her to come to the shed. At some point, an additional person, Timothy Cottrell, entered the shed.

Once Scully arrived, Torres hit Scully with his fist and shoved the gun in her mouth. He asked Scully where the drugs and money were. Scully, aware that her late husband had drugs in a storage unit, assumed this was what Torres meant. Torres told Scully to take him to the storage unit, pointed the gun at Cottrell, and directed him to come with them.

The trio entered the storage facility through a security gate by using a code known to Scully. Once at the storage unit, Scully gave Torres a box containing personal items and $6,000 in cash. Torres tried to leave the storage facility, but his car would not start. Scully escaped, and Torres and Cottrell later climbed the security gate.

An investigation found a blue latex glove near the disabled car. DNA tests confirmed the near certainty that the glove had been worn by Torres. In an unrelated investigation, law enforcement found a gun in a vent in a common area bathroom in a residence where Torres lived. The barrel of the gun was swabbed for saliva DNA, and tests confirmed the near certainty that the saliva belonged to Scully.

Procedure

The State charged Torres with unlawful possession of a firearm in the second degree and also with several other felonies related to the three victims—with respect to Scully—second degree assault, first degree kidnapping, and first degree robbery; with respect to Cottrell—second degree assault and first degree kidnapping; and with respect to Phipps—second degree assault.

Prior to trial, the court ruled on motions in limine. The State informed the court that one witness knew Torres by the moniker "Crook" and did not think the moniker would be used during trial unless identity was an issue. Rep. of Proc. (RP)[1] at 30. It also informed the court that during the incident in the shed, Torres had lifted his shirt to expose some tattoos and shouted "'southside.'" RP at 32. The defense objected to all of this. The trial court directed the State to inform its witnesses to refer to Torres by his

[1] "RP" refers to the consecutively paginated verbatim report of proceedings numbered 1 through 882.

name, but if identity became an issue, "it comes in, including any display of any tattoo. Actions have consequences. It's in." RP at 33.

References at trial to Torres's moniker and tattoos

During trial, Cottrell testified he had seen the defendant once, perhaps twice, before the shed incident. Because Cottrell's identification of Torres was uncertain, the State sought to prove identity by connecting how Torres had identified himself in the shed with his street name, which was known to law enforcement.

The court allowed the State to first ask if Cottrell knew the defendant by another name. The following colloquy ensued:

> [STATE:] . . . [D]uring the course of this, did you learn a . . . nickname for [the defendant] at some point? Just yes or no—
> [COTTRELL:] Crook, yes.
> [STATE:] And so you learned he had a nickname. How did you come to learn he had a nickname during this?
> [COTTRELL:] In the garage.[2]
> [STATE:] Okay. And did he say that or did someone call him by that?
> [COTTRELL:] I'm not quite sure which one that was. But I know I heard the nickname.
> [STATE: And what was the nickname?
> [COTTRELL:] Crook.

RP at 242.

[2] Referring to the shed-like structure where the initial incident occurred.

Scully testified she had never met the defendant until the shed incident. When asked how the defendant identified himself, she answered, "Crook." RP at 534.

Phipps similarly testified he did not know the defendant until the shed incident. He testified that while in the shed, the defendant lifted up his shirt, exposed his tattoos, and said he was a "southsider." RP at 161. Phipps described the tattoos to the jury as words around the defendant's neck and over his heart, three dots and two bars. The State then asked Phipps to look at a photograph of the defendant's chest, and Phipps confirmed that the tattoos in the photograph were those he had described to the jury.

Detective Luke Flohr testified that Torres used the moniker "Crook." RP at 415. He also described statements the witnesses made to him as part of his investigation. The detective testified that Cottrell referred to Torres only as "Crook," implying that Cottrell did not know Torres's real name. Detective Flohr also testified that Phipps described Torres's tattoos.

Verdict and sentence

The jury convicted Torres of the charged crimes, except those related to Cottrell as the victim. The trial court sentenced Torres with an offender score that included three prior convictions for possessing a controlled substance, one point added for committing the offenses while on community placement, and an Idaho conviction for trafficking in methamphetamine.

Torres appealed.

ANALYSIS

ADMISSION OF EVIDENCE

Torres argues the trial court erred by admitting evidence that painted him as a Latino gang member—his moniker, his self-identification as a "southsider," and his tattoos. He additionally argues that the relevance of this evidence was substantially outweighed by its unfair prejudice. We disagree.

A court may not admit "other crimes, wrongs, or acts" to prove propensity to commit the charged crimes. ER 404(b). This rule bars not only bad acts, "but *any* evidence offered to 'show the character of a person to prove the person acted in conformity' with that character." *State v. Foxhoven*, 161 Wn.2d 168, 175, 163 P.3d 786 (2007) (alteration in original) (quoting *State v. Everybodytalksabout*, 145 Wn.2d 456, 466, 39 P.3d 294 (2002)). Moreover, ER 404(b) must be read alongside ER 403, to ensure that the risk of a propensity inference is not substantially outweighed by its probative value. *State v. Vy Thang*, 145 Wn.2d 630, 642, 41 P.3d 1159 (2002).

Here, the State's witnesses did not know Torres, but their identification of him was a central issue in the case. Numerous studies have shown the fallibility of eyewitness identification evidence, especially identification of a person whose ethnicity is different than the witness's ethnicity. *See Manson v. Brathwaite*, 432 U.S. 98, 97 S.

Ct. 2243, 53 L. Ed. 2d 140 (1977). Given this, it would have been unreasonable for the trial court to limit the witnesses' identification of Torres as the person sitting opposite of them at trial.

In general, we review a trial court's evidentiary rulings for an abuse of discretion and will reverse only if no reasonable judge would have decided the matter as the trial court did. *State v. Thomas*, 150 Wn.2d 821, 856, 83 P.3d 970 (2004). To the extent the challenged evidence tended to identify Torres as a gang member, and it did tend to, the record shows the State elicited the evidence rarely, only as identifiers or as consistent prior statements the witnesses made to the detective. Critically, the State did not highlight the evidence in any manner to argue that Torres was in a gang or that he was a bad person. Given how crucial proof of Torres's identity was to the State's case, we cannot say that no reasonable judge would have admitted the challenged evidence. We conclude the trial court's evidentiary rulings were not an abuse of discretion.[3]

DOUBLE JEOPARDY

Torres argues his double jeopardy rights were violated when the trial court failed to merge his assault in the second degree conviction with his kidnapping in the first degree conviction. The State, citing *State v. Davis*, 177 Wn. App. 454, 461-62, 311 P.3d

[3] Moreover, error, if any, was nonprejudicial. The State's other evidence—summarized on pages 20-22 of its brief—convinces us that a jury would have convicted Torres in the absence of the challenged evidence.

1278 (2013), concedes that the assault conviction (involving Scully) merged into the more serious kidnapping conviction. The State notes that Torres committed the two offenses when he stuck the gun into Scully's mouth and abducted her. We accept the State's concession.

PRIOR CONVICTIONS

Torres argues he is entitled to resentencing because his offender score must be recalculated. He argues (1) the three unconstitutional possession of controlled substance convictions should be omitted, along with the point for committing a crime while on community placement, and (2) his Idaho conviction for trafficking in methamphetamine should either be omitted or we should remand for the trial court to conduct a comparability analysis. The State concedes the first issue and argues remand for a comparability analysis of the Idaho conviction is required. We mostly agree.

Unconstitutional convictions

A prior conviction that later is determined unconstitutional may not be included in an offender score. *State v. Ammons*, 105 Wn.2d 175, 187, 713 P.2d 719, 718 P.2d 796 (1986). Recently, in *State v. Blake*, 197 Wn.2d 170, 186, 481 P.3d 521 (2021), our Supreme Court ruled that Washington's strict liability drug possession statute was unconstitutional. Accordingly, Torres's three prior convictions for unlawful possession of a controlled substance, along with his one-point increase for committing a current

offense while on community placement or custody, should be omitted from his criminal history.

Idaho's trafficking in methamphetamine statute

Idaho's trafficking in methamphetamine statute is not legally comparable to a Washington felony. In Idaho, "[a]ny person who knowingly delivers, or brings into this state, or who is knowingly in *actual or constructive possession of*, twenty-eight (28) grams or more of methamphetamine . . . is guilty of a felony." Idaho Code § 37-2732B(a)(4) (emphasis added). This statute can thus be violated by mere possession of methamphetamine. *State v. McIntosh*, 160 Idaho 1, 5, 368 P.3d 621 (2016). The statute is thus broader than any otherwise comparable Washington felony in light of *Blake*, 197 Wn.2d at 186.

Nevertheless, depending on the underlying facts of the Idaho conviction, the trafficking conviction could be comparable to a Washington delivery of a controlled substance conviction. We remand for a factual comparability analysis.

VICTIM PENALTY ASSESSMENT

The trial court imposed a $500 victim penalty assessment (VPA). The legislature subsequently amended the relevant statutes to prevent requiring indigent defendants to pay this fee. LAWS OF 2023, ch. 449, §§ 1, 4. This change applies prospectively to cases pending on direct review. *State v. Ramirez*, 191 Wn.2d 732, 749, 426 P.3d 714 (2018).

Here, the trial court found Torres indigent. We direct the trial court to strike the $500 VPA.

Affirmed in part, and remanded for resentencing to recalculate offender score, and strike the VPA.

A majority of the panel has determined this opinion will not be printed in the Washington Appellate Reports, but it will be filed for public record pursuant to RCW 2.06.040.

Lawrence-Berrey, C.J.

WE CONCUR:

Fearing, J.

Staab, J.

DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original document **Petition for Review to the Supreme Court** to which this declaration is affixed/attached, was filed in the **Court of Appeals** under **Case No. 39254-6-III**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office / residence / e-mail address as listed on ACORDS / WSBA website

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