FILED
Court of Appeals
Division II
State of Washington
5/9/2022 4:09 PM

NO. 56444-1-II

THE COURT OF APPEALS OF THE STATE OF WASHINGTON, DIVISION TWO

STATE OF WASHINGTON,

Respondent,

v.

COREY COLEMAN,

Appellant.

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

BRIEF OF APPELLANT

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A. INTRODUCTION

Punishment must follow a crime. The State may not penalize a person's conduct unless a statute defines the conduct as an offense. Imprisoning a person for a nonexistent crime is a breach of due process.

Corey Coleman pleaded guilty to felony drug possession and received a prison sentence, which he served at home due to the COVID-19 crisis. The prosecution alleged he left home without permission and charged him with escape.

Before the trial, the Supreme Court struck down the felony drug possession statute as unconstitutional. The conduct underlying Mr. Coleman's sentence is not—and never was—an offense, and the State had no power to confine Mr. Coleman in the first place. By finding Mr. Coleman guilty of first-degree escape, the trial court convicted him of a nonexistent crime.

B. ASSIGNMENT OF ERROR

The trial court erred in finding all the elements of first-degree escape where Mr. Coleman was not confined pursuant to a conviction of a felony.

C. ISSUE PERTAINING TO ASSIGNMENT OF ERROR

An unconstitutional statute is deemed void from its enactment. When the Supreme Court struck down the felony drug possession statute, it rendered all convictions under the statute void for all purposes, including the conviction underlying Mr. Coleman's confinement. The trial court erred in finding Mr. Coleman was confined pursuant to a felony conviction.

D. STATEMENT OF THE CASE

1. In *State v. Blake*, the Supreme Court finds Washington's felony drug possession statute unconstitutional.

For years, Washington stood alone as the only state in the nation to punish drug possession as a

felony without requiring any proof the charged person knew they possessed drugs. *State v. Blake*, 197 Wn.2d 170, 173–74, 176, 183, 481 P.3d 521 (2021); former RCW 69.50.4013(1); Laws of 2017, ch. 317, § 15. By criminalizing even unknowing possession, the statute reached innocent, passive conduct. *Id.* at 183–84.

Persons convicted under the statute faced "countless harsh collateral consequences affecting all aspects of their lives." *Id.* at 184–85. These consequences fell especially on "young men of color," as such consequences often do. *Id.* at 192.

Recognizing these problems, the Supreme Court struck down former RCW 69.50.4013(1) as unconstitutional. *Id.* at 173. Because the strict liability felony criminalized "unknowing, and hence innocent," passive conduct, enacting the statute was beyond the scope of the Legislature's police power. *Id.* at 186.

Accordingly, former RCW 69.50.4013(1) "violates the due process clauses of the state and federal constitutions and is void." *Blake*, 197 Wn.2d at 195.

2. Before *Blake*, the prosecution charges Mr. Coleman with first-degree escape with drug possession as the sole predicate felony.

In 2019, Mr. Coleman pleaded guilty to possession of a controlled substance under former RCW 69.50.4013(1), as well as a misdemeanor assault. CP 26, 56 FF 1.1a–1.3.[1] The court sentenced him to a prison term. CP 28, 56 FF 1.2. Due to the COVID-19 crisis, by order of the governor, Mr. Coleman was released from prison to serve the sentence on electronic home monitoring. CP 56 FF 1.4–1.5.

In May 2020, Mr. Coleman's ankle monitor reported a location in a different town from his

[1] "CP 56 FF 1.3" refers to the trial court's finding of fact number 1.3, on page 56 of the designated clerk's papers.

approved residence. CP 56–57 FF 1.12, 1.16. The battery in the monitor then died. CP 57 FF 1.17. Law enforcement visited Mr. Coleman's house and did not find him there. CP 57 FF 1.20.

The prosecution charged Mr. Coleman with first-degree escape. CP 1.

3. The *Blake* opinion voids Mr. Coleman's possession conviction before the escape trial, and the trial court erroneously finds Mr. Coleman guilty of first-degree escape anyway.

On February 25, 2021, before Mr. Coleman's trial on the escape charge, the Supreme Court decided *Blake*. 197 Wn.2d at 195; *see* CP 59 (trial held November 2021). *Blake* rendered all convictions under former RCW 69.50.4013(1)—including Mr. Coleman's—unconstitutional and "void." 197 Wn.2d at 195.

Mr. Coleman moved to dismiss the first-degree escape charge, arguing the prosecution could not show his confinement rested on a felony conviction after

Blake. CP 7; 10/13/21 RP 9. By holding the Legislature lacked the power to enact former RCW 69.50.4013(1), he argued, the Supreme Court rendered the statute void "from the start." *Id.* at 12–13. Mr. Coleman distinguished cases holding a person may not attack the predicate conviction at the escape trial—unlike those cases, the "Supreme Court said his conviction was illegal" before the trial even began. *Id.* at 9.

The trial court denied the motion. CP 50. Based on stipulated facts, the court found Mr. Coleman guilty of first-degree escape. CP 55, 58. It imposed a sentence of more than five years in prison. CP 60.

E. ARGUMENT

The trial court erred in finding Mr. Coleman was confined under a "conviction of a felony," as required to convict him of first-degree escape.

The Legislature never had authority to enact former RCW 69.50.4013(1), and the State never had

authority to confine Mr. Coleman for violating the statute. Mr. Coleman's confinement was unlawful from the start, and escaping from it was a nonexistent crime. Because *Blake* eliminated the only felony conviction that could support Mr. Coleman's first-degree escape conviction, this Court should reverse.

a. After Blake*, a felony conviction of possessing a controlled substance is void, and courts must treat the conviction as though it never existed.*

"If a statute is unconstitutional, it is and has always been a legal nullity." *State ex rel. Evans v. Bhd. of Friends*, 41 Wn.2d 133, 143, 247 P.2d 787 (1952). When a court strikes down a statute because "the conduct it proscribed was beyond the power of the state to punish," that conduct "was not, is not, and could never be a crime." *In re N.G.*, 115 N.E.3d 102, 118 (Ill. 2018). A conviction under an unconstitutional statute "is illegal and void, and cannot be a legal cause of

imprisonment." *Montgomery v. Louisiana*, 577 U.S. 190, 203, 136 S. Ct. 718, 193 L. Ed. 2d 599 (2016) (quoting *Ex parte Siebold*, 100 U.S. 371, 376–77, 25 L. Ed. 717 (1879)).

Courts have deemed an "unconstitutional act" to be "as inoperative as though it had never been passed" since before Washington became a state. *Norton v. Shelby Cty.*, 118 U.S. 425, 442, 6 S. Ct. 1121, 30 L. Ed. 178 (1886). "An unconstitutional law is void, and is as no law. An offence created by it is not a crime." *Siebold*, 100 U.S. at 376. When a person violates a statute "repugnant to the constitution, the prosecution against him has nothing upon which to rest, and the entire proceeding against him is a nullity." *Ex parte Royall*, 117 U.S. 241, 248, 6 S. Ct. 734, 29 L. Ed. 868 (1886).

Accordingly, when the Supreme Court interprets a criminal statute such that a convicted person's

conduct was "a nonexistent crime," the conviction is void. *In re Pers. Restraint of Hinton*, 152 Wn.2d 853, 860, 100 P.3d 801 (2004). Before *Hinton*, the Court held the felony murder statute did not allow second-degree assault to serve as a predicate. *In re Pers. Restraint of Andress*, 147 Wn.2d 602, 616, 56 P.3d 981 (2002). *Andress* determined "what the [felony murder] statute has meant since its enactment." *Hinton*, 152 Wn.2d at 859–60 & n.2. Because the petitioners were found guilty of murder based on second-degree assault, they were "convicted of nonexistent crimes." *Id.* at 860.

When the Supreme Court held former RCW 69.50.4013(1) was beyond the Legislature's power to enact, that holding established the statute "*has always been void* under both the state and federal constitutions." *State v. French*, ___ Wn. App. 2d ___, No. 82930-1-I, 2022 WL 1301977, at *1 (May 2, 2022)

(emphasis added). Felony drug possession "was not, is not, and could never be a crime." *N.G.*, 115 N.E.3d at 118. In proceedings following *Blake*, therefore, courts properly treat convictions under former RCW 69.50.4013(1) as if they never occurred.

As the most obvious example, courts vacate convictions obtained under the void possession statute. *State v. Smith*, No. 37684-2-III, 2022 WL 289809, at *3 (Wash. Ct. App. Feb. 1, 2022) (unpub.); *In re Pers. Restraint of Garcia*, No. 38099-8-III, 2021 WL 6012416, at *2 (Wash. Ct. App. Dec. 16, 2021) (unpub.); *In re Pers. Restraint of Aranda*, No. 35949-2-III, 2021 WL 5898931, at *2 (Wash. Ct. App. Dec. 14, 2021) (unpub.); *State v. Nugent*, No. 53724-9-II, 2021 WL 5578047, at *5 (Wash. Ct. App. Nov. 30, 2021) (unpub.); *see* GR 14.1(a). The Supreme Court granted the same relief in *Blake*. 197 Wn.2d at 195.

Where a sentence rests on *prior* possession convictions, remand is necessary to recalculate the sentence without them. *E.g.*, *State v. Sullivan*, 18 Wn. App. 2d 225, 247, 491 P.3d 176 (2021); *State v. LaBounty*, 17 Wn. App. 2d 576, 581–82, 487 P.3d 221 (2021). A sentence based on an analogous out-of-state conviction also requires remand. *State v. Markovich*, 19 Wn. App. 2d 157, 174, 492 P.3d 206 (2021); *State v. Clark*, No. 37838-1-III, 2022 WL 102619, at *6 (Wash. Ct. App. Jan 11, 2022) (unpub.); *see* GR 14.1(a).

Blake established that courts not only "were *never* with lawful authority to enter judgment on a conviction" under former RCW 69.50.4013(1), but also never had "lawful authority to impose a *sentence* pursuant to such a conviction." *French*, 2022 WL 1301977, at *3. If, for example, the trial court imposed a higher sentence because the crime was committed

while on community custody, and the only basis for community custody was a conviction under RCW 69.50.4013(1), remand for resentencing is required. *Id.*

Most importantly, when a prior possession conviction is an element of a later -charged offense, *Blake* requires courts to vacate a conviction of the later offense. *In re Pers. Restraint of Gonzalez*, No. 38080-7-III, 2021 WL 4860031, at *1 (Wash. Ct. App. Oct. 19, 2021) (unpub.) (citing *Hinton*, 152 Wn.2d at 860; *Evans*, 41 Wn.2d at 143); *see* GR 14.1(a). For example, courts vacate unlawful firearm possession convictions where the predicate felony was drug possession. *Id.*; *In re Pers. Restraint of Jones*, No. 83076-7-I, 2022 WL 1133164, at *1 (Wash. Ct. App. Apr. 18, 2022) (unpub.).

Blake established once and for all time that all convictions under former RCW 69.50.4013(1), including Mr. Coleman's, are void on their faces. Mr. Coleman's

possession conviction cannot furnish a basis for any future punishment, including a conviction of escape.

b. Because Mr. Coleman's possession conviction became a nullity before the trial, he did not have a "conviction of a felony" and the court could not find all elements of escape.

"[I]t is a fundamental due process violation to convict and incarcerate a person for a crime without proof of all the elements of the crime." *Hinton*, 152 Wn.2d at 859. Punishing a person "for an offense which was not criminal at the time he committed it is unlawful and a miscarriage of justice." *In re Pers. Restraint of Thompson*, 141 Wn.2d 712, 719, 10 P.3d 380 (2000).

To convict Mr. Coleman of first-degree escape, the prosecution had to prove the state detained Mr. Coleman "pursuant to a conviction of a felony." RCW 9A.76.110(1); WPIC 120.26. The stipulated findings set forth only one felony conviction—possession of a

controlled substance under former RCW 69.50.4013(1). CP 56 FF 1.2–1.3; *accord* CP 26. The trial court held Mr. Coleman's possession conviction fulfilled this element of first-degree escape. CP 50, 57–58.

The trial court was wrong. Nine months before the trial, the Supreme Court held former RCW 69.50.4013(1) unconstitutional and void. *Blake*, 197 Wn.2d at 195. The crime the statute defined ceased to exist and all convictions under it became invalid on their faces. *Thompson*, 141 Wn.2d at 719; *Norton*, 118 U.S. at 442. The trial court's guilty verdict therefore deprived Mr. Coleman of due process. *Hinton*, 152 Wn.2d at 859–60; *Thompson*, 141 Wn.2d at 719.

Though *Blake* made Mr. Coleman's possession conviction void on its face, the trial court nevertheless found it could support the first-degree escape charge

based on *State v. Gonzales*, 103 Wn.2d 564, 693 P.2d 119 (1985). CP 50. This was error.

In *Gonzales*, the Supreme Court held the prosecution does not have a burden to prove a predicate conviction was "constitutionally valid" to convict of first-degree escape. 103 Wn.2d at 567. This holding follows from the broader rule that a person may not "challenge the legality of their confinement at the escape trial." *Id.* at 567–68 (citing 70 A.L.R.2d 1430 (1960 & Supp. 1984)); *State v. Hall*, 104 Wn.2d 486, 491, 706 P.2d 1074 (1985).

It bears noting that *Gonzales*'s reasoning is flawed. The Court disregarded precedent that, when an offense includes a prior conviction as an element, "the word 'conviction'" means "a valid, constitutional conviction." 103 Wn.2d at 568 (Williams, J., concurring in result). In fact, the Court had recently held the

prosecution must prove a valid conviction when alleging unlawful possession of a firearm. *Id.* at 568–69; *State v. Gore*, 101 Wn.2d 481, 485–86, 681 P.2d 227 (1984); *State v. Swindell*, 93 Wn.2d 192, 196–97, 607 P.2d 852 (1980). The *Gonzales* Court distinguished *Gore* and *Swindell* on the ground that people have a constitutional right to own firearms, while ignoring the even more basic right to be free from restraint without due process. *Id.* at 569–70; 10/13/21 RP 11.

Whether or not *Gonzales* and opinions following it are good law, however, they do not apply here. In none of those cases did a court hold the statute of conviction itself was unconstitutional and void.

For example, in *Gonzales*, the trial court found a conviction invalid because the guilty plea statement supported no more than a misdemeanor. 103 Wn.2d at 566. In *Hall*, the defendant argued the prosecution

breached a plea agreement. 104 Wn.2d at 491. In a similar case involving bail jumping rather than escape, the defendant argued double jeopardy barred the current charges. *State v. Downing*, 122 Wn. App. 185, 193, 93 P.3d 900 (2004).

Unlike in *Gonzales*, *Hall*, and *Downing*, the Supreme Court held the statute underlying Mr. Coleman's conviction was void *before* the escape trial. *Blake*, 197 Wn.2d at 195. There was no need to "challenge the legality of [Mr. Coleman's] confinement at the escape trial"—the Supreme Court established its illegality before the trial even began. *Gonzales*, 103 Wn.2d at 567–68.

Prohibiting punishment based on a constitutionally void prior conviction is not the same as requiring the prosecution to prove the conviction is valid. *See State v. Ammons*, 105 Wn.2d 175, 187–88,

713 P.2d 719, *as amended*, 718 P.2d 796 (1986). In *Ammons*, like in *Gonzales*, the Supreme Court held the prosecution does not have to prove a prior conviction is valid before a court can rely on it to determine a sentence. *Id.* at 187. Nevertheless, the Court went on to hold a trial court may not consider "a prior conviction . . . which is *constitutionally invalid on its face*." *Id.* at 187–88 (emphasis added).

In *Blake*, the Supreme Court held that former RCW 69.50.4013(1) was beyond the Legislature's power to enact and therefore "void." 197 Wn.2d at 195. There can be no question a conviction of violating the former statute is "constitutionally invalid on its face." *State v. Jennings*, 199 Wn.2d 53, 67, 502 P.3d 1255 (2022) (citing *Ammons*, 105 Wn.2d at 187–88).

While the prosecution did not have to produce evidence the conviction was "constitutionally valid," it

had to prove Mr. Coleman had a felony conviction in the first place. *Gonzales*, 103 Wn.2d at 567; RCW 9A.76.110(1). Where the Supreme Court held before the trial that all convictions under former RCW 69.50.4013(1) are void, the prosecution could not rely on such a conviction to prove this element of the offense. After *Blake*, a conviction of felony drug possession cannot support first-degree escape.

Because former RCW 69.50.4013(1) has been a "legal nullity" since its enactment, Mr. Coleman's conviction is as void as if the statute "had never been passed." *Evans*, 41 Wn.2d at 143; *Norton*, 118 U.S. at 442. Mr. Coleman's possession conviction was facially invalid, and the trial court could not rely on it to conclude Mr. Coleman's confinement was "pursuant to

a conviction of a felony."[2] RCW 9A.76.110(1); *Ammons*, 105 Wn.2d at 187–88.

Blake rendered Mr. Coleman's felony possession conviction void, and escaping from confinement pursuant to that conviction was a "nonexistent crime." *Hinton*, 152 Wn.2d at 860. When "the State ha[s] no power to proscribe the conduct for which the petitioner was imprisoned, it [can]not constitutionally insist that he remain in jail." *Montgomery*, 577 U.S. at 202 (quoting *Desist v. United States*, 394 U.S. 244, 261 n.2, 89 S. Ct. 1030, 22 L. Ed. 2d 248 (1969) (Harlan, J., dissenting)). This Court's duty "to see that the law is carried out uniformly and justly" requires it to reverse

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[2] The statement in the stipulated findings Mr. Coleman "was being detained pursuant to a felony conviction" is not a defense concession his possession conviction can support an escape charge. CP 57 FF 1.23. The parties drafted the findings after the trial court held the conviction could stand as a predicate offense even after *Blake*. CP 50; RP 16–17, 27–28.

Mr. Coleman's conviction of first-degree escape.

Hinton, 152 Wn.2d at 856.

F. CONCLUSION

This Court should reverse Mr. Coleman's conviction of first-degree escape.

Pursuant to RAP 18.17(c)(2), the undersigned certifies this brief of appellant contains 2,891 words.

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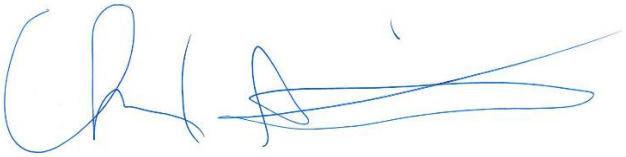

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IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
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	)	
Respondent,	)	
	)	NO. 56444-1-II
v.	)	
	)	
COREY COLEMAN,	)	
	)	
Appellant.	)	

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Superior Court Case Number:	20-1-00525-2

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