



Washington State
**Office of
Public
Defense**

Title: Shifting Mindsets, Challenging Your Venires

April 28, 2023

**Presenter: Barbara Harris
Disproportionality Attorney,
Legal Training Coordinator**

January 23, 2023 (Brennan Center for Justice)

[A Conversation with Washington Supreme Court Chief Justice Steven C. González - YouTube](#)

**A Conversation with Washington Supreme Court Chief Justice Steven C. González
(begin @ 19:08 min. into interview)**



Diversity in Juries Makes a Difference

“The studies all show that a heterogeneous body is better than a homogeneous one.”

“Many of them in jury deliberations show that a mixed jury is better on every objective measure than a homogeneous jury is except maybe on the measure of efficiency.”

“If you are going to do it better sometimes it takes a bit longer.”

“So, I think that sacrifice in efficiency, is well worth it because we found that mixed juries, for example, were more likely to talk amongst themselves, they were more likely to actually read and follow the instructions from the court.”

<https://www.brennancenter.org/StateCo...>

<https://www.brennancenter.org/our-work/research-reports/conversation-washington-supreme-court-chief-justice-steven-c-gonzalez>

Diversity in Juries Makes a Difference

They were more likely to examine carefully the exhibits that were given to them, and I think that's true for us too as a court of last review.”

“There are nine of us, and that diversity among us helps us, I think be better decision makers and the outcomes are different and improved.”

<https://www.brennancenter.org/StateCo...>

<https://www.brennancenter.org/our-work/research-reports/conversation-washington-supreme-court-chief-justice-steven-c-gonzalez>

How Does Diversity In Juries Actually Happen?

Compatible

If things, for example systems, ideas, and beliefs, are compatible, they work well together or can exist together successfully.

<https://www.collinsdictionary.com/us/dictionary/english/compatible>

Is the initial venire, from which you are to choose potential jurors who will deliberate and determine the fate of your client, compatible with the mandates of the 6th Amendment?

What are those mandates? (substantial guarantees, bedrock rights of the accused)

Sixth Amendment

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the Assistance of Counsel for his defense.

<https://constitution.congress.gov/constitution/>

6th Amendment Jury requires: Cross Section of the Community and Impartiality

Sine qua non (is Latin for “without which not.”)

When something is described as sine qua non, it is a **necessary or indispensable requirement**. The phrase represents an essential element, component, or condition of something else.

[Last updated in July of 2021 by the Wex Definitions Team] legal theory.

https://www.law.cornell.edu/wex/sine_qua_non#:~:text=The%20phrase%20sine%20qua%20non,legal%20theor

Courts' Jurisprudence

Impartiality:

The Sixth Amendment to the U.S. Constitution guarantees criminal defendants an impartial jury, and the Supreme Court has held that “an essential component” of this guarantee is the “selection of a [trial] jury from a representative cross-section of the community.” *Taylor v. Louisiana*, 419 U.S. 522, 528 (1975).

The Supreme Court further explored the representative-cross-section guarantee a few years later, in *Duren v. Missouri*, 439 U.S. 357 (1979), where it provided a framework for determining whether a fair cross-section claim has been established.

**The Duren framework requires:
The party making the fair-cross-section
challenge to satisfy each of three prongs in
order to establish his or her prima facie case.**

To make out the **prima facie case**, the party must show:

“[1] that the group alleged to be excluded is a ‘distinctive’ group in the community;

[2] that the representation of this group in venires from which juries are selected is not fair and reasonable in relation to the number of such persons in the community; and

[3] that this underrepresentation is due to the systematic exclusion of the group in the jury-selection process.”

Then, if the prima facie case has been established, (First prong of the Duren Test)

the burden then shifts to the other party to prove “that a significant state interest [is] manifestly and primarily advanced by those aspects of the jury-selection process . . . that result in the disproportionate exclusion of a distinctive group.” *Id.* at 367-68.

Once the prima facie case has been established, the burden shifts to the other party to prove a compelling justification for the exclusion, and recent cases make clear that states retain broad discretion to establish qualification, exemption, and excusal criteria. See, e.g., *Berghuis v. Smith*, 559 U.S. 314 (2010).

Second prong of the *Duren* test

The second prong of the *Duren* test requires that the party making the challenge show “that the representation of [the] group in venires from which juries are selected is not fair and reasonable in relation to the number of such persons in the community.” *Duren*, 439 U.S. 357. In exploring the second prong, the question thus is not about the makeup of the jury panel itself, but, rather, about the representativeness of the *sources* from which the jurors are selected.

Batson v. Kentucky

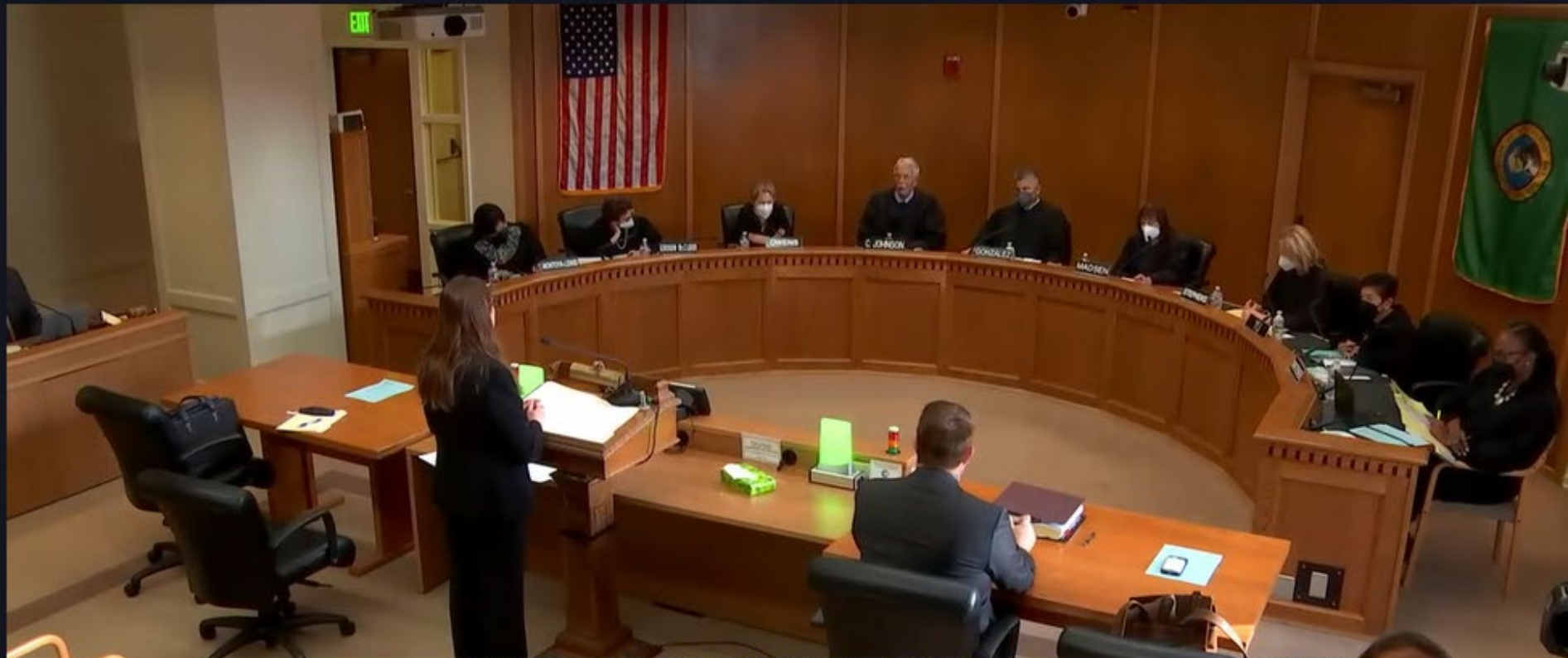
476 US 79 (1986) (The Court found that the prosecutor's actions violated the Sixth and Fourteenth Amendments of the Constitution). 7-2 Decision

During the criminal trial in a Kentucky state court of petitioner, a black man, the judge conducted *voir dire* examination of the jury venire and excused certain jurors for cause. The prosecutor then used his peremptory challenges to strike all four black persons on the venire, and a jury composed only of white persons was selected. Defense counsel moved to discharge the jury on the ground that the prosecutor's removal of the black veniremen violated petitioner's rights under the Sixth and Fourteenth Amendments to a jury drawn from a cross-section of the community, and under the Fourteenth Amendment to equal protection of the laws.

Washington Courts addressed the shortcomings of Batson through rule making, General Rule 37: GR 37 is good when it comes to preventing unfair exclusions of jurors based on race, but it can't do too much if we don't have diverse pools coming into the door in the first place.

**WA State Supreme Court recently
heard oral arguments in a case on
September 15, 2022:
State of Washington v. Paul Rivers**

<https://twv.org/video/washington-state-supreme-court-2022091163/?eventID=2022091163>



STATE OF WASHINGTON V. PAUL RIVERS **9/15/22**
DID KING COUNTY'S JURY SUMMONS PROCESS VIOLATE THE DEFENDANT'S STATE OR FEDERAL CONSTITUTIONAL RIGHT TO AN IMPARTIAL JURY DRAWN FROM A FAIR CROSS-SECTION OF THE COMMUNITY?
WASHINGTON STATE SUPREME COURT



Chief Justice Gonzales asked Counsel for Mr. Rivers, “Where does the responsibility for fixing the problem with jury venires fall? Is it within the wheel house of the court through rule making, through a decision in a particular case or with the legislature – specifically by addressing juror pay?”

Counsel for Mr. Rivers: “The responsibility defining the scope of the constitutional right lies with this Court and the Court has a duty to recognize under WA’s Constitution, we tolerate less racial disparity in jurors than the 6th amendment. This Court should define a more protective right under the constitution and should establish a new standard.

Justice Madsen asked: “Is the court to look at the venire that appears in the court house or are we looking at who was summoned for service?”

Counsel for Mr. Rivers: “The people that are actually coming to the courtroom for jury selection in a particular case.”

Justice Johnson inquired as follows:

“It sounds like an applied challenge. And when there must be a right that must be preserved in this , in the form of a motion , am I correct ? Those are those two things that would be required. We’re looking just at the individual case and whether the issue has been preserved.”

Counsel for Mr. Rivers: I think that that’s correct your honor.”

Disproportionality Advocacy

Jury Selection Challenges

<https://www.opd.wa.gov/24-advocacy/246-jury-selection>

- [GR 31 Access to Court Records \(k\) Access to Master Jury Source List \[PDF\]](#) 
- [Sample request language to Clerk of the Court regarding their Jury Selection Process \[PDF\]](#)
- [Jury Selection Processes in Washington Counties \[DOC\]](#)
- [Race and the Jury](#) 
- Race and Voir Dire
 - [GR37 Challenges State v. Tesfasilasye, October 6, 2022](#) 
 - [Center For Appellate Litigation](#) 
 - [Race and Voir Dire NACDL Resource \[PDF\]](#) 
- [Juries Diversity in Performance and Perceived Legitimacy of their Process \[PDF\]](#)
- [2021 Update US State Supreme Courts and Bench Diversity](#) 
- [Population Data Washington State and by County](#) 
- [Race and Jury Trials, Reducing Juror Bias](#) 
- [Raising Issues of Race \[PDF\]](#) 
- [No Records, No Right: Discovery & Fair Cross Section \[PDF\]](#) 
- [State of Washington v. Benjamin Orozco, Division III \[PDF\]](#) 

**Jan. 10, 2023 Division II - 56250-2
State Of Washington, Respondent V. Curtis L.
Mcknight, Jr., Appellant (Published in Part)**

Curtis McKnight, an African American man, appeals his multiple convictions on the ground that the trial court's decision not to reorder the jury venire for his case during jury selection violated his right to a jury drawn from a fair cross section of the community under the Sixth Amendment to the United States Constitution.

<https://www.courts.wa.gov/opinions/?fa=opinions.disp&filename=562502MAJ>

**Barbara Harris, JD, CDE
Disproportionality Attorney,
Legal Training Coordinator
(360) 586 - 3164 ext. 115**

barbara.harris@opd.wa.gov

Shifting Mindsets: Challenging Your Venire

April 28, 2023

**Presenter: Geoff Hulse
Managing Attorney,
Public Defense Improvement Program**

Argumentum ad Antiquitatem

**Appeal to tradition/past
performance/antiquity**

**It is a fairly effective tool to get
someone to relent to the authority
figure**

...but so are most fallacies

How to Combat These Responses

- 1. Understand the societal context you are dealing with.**
- 2. Understand the laws you are dealing with.**
- 3. Come armed with data and exhibits.**
- 4. Make the Motion and preserve the issue.**

Societal Context

We do not live in a “post-racial” society.

Outside of Criminal Justice

Black women are 3.2 times more likely to die due to pregnancy-related deaths than white women. ¹

- Overall, BIPOC women have a higher maternal mortality rate than white women.

Black home ownership lags significantly behind white home ownership. ²

- Q3 2022 Overall home ownership – 66.0%
- Q3 2022 Non-Hispanic White home ownership – 74.6%
- Q3 2022 Black Alone home ownership – 45.2%

Racial disparity in educational attainment. ³

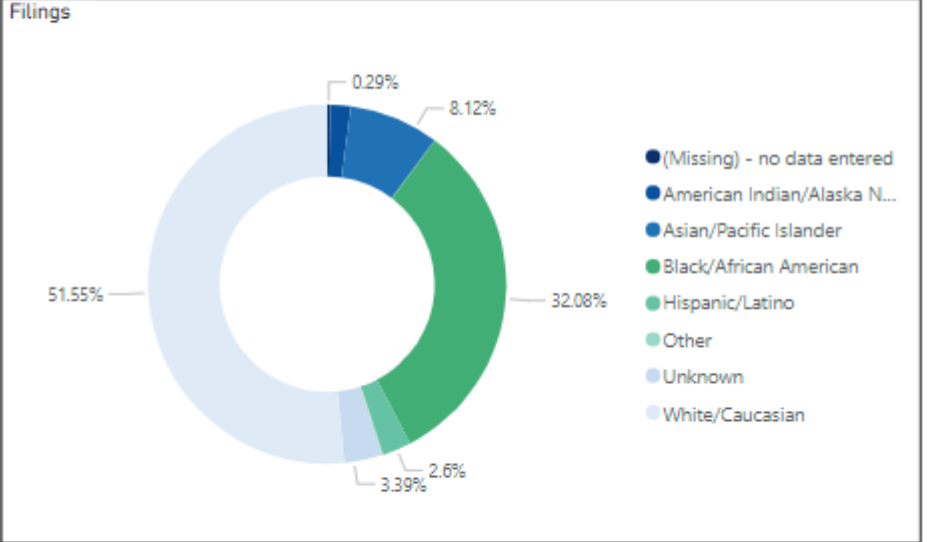
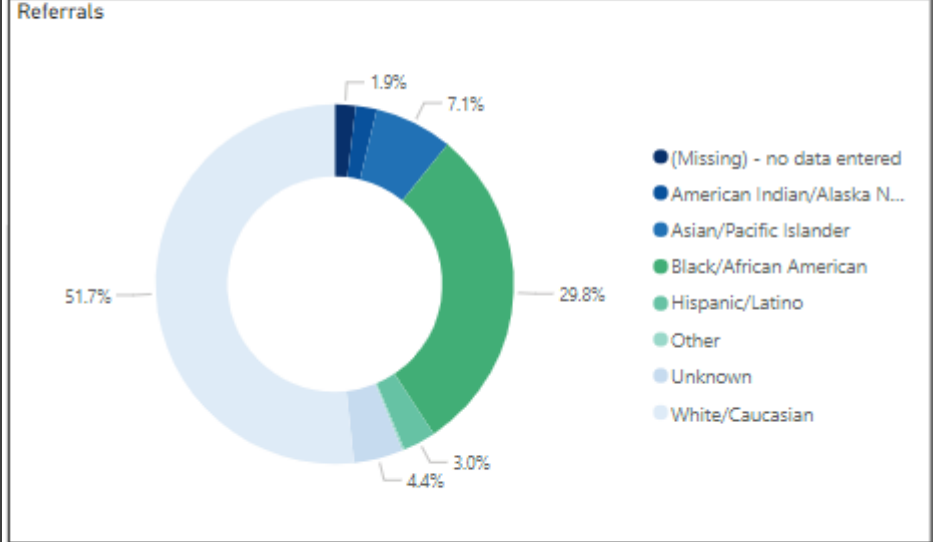
- High School Degree or Higher / Bachelor's Degree or higher
 - White 93.5% / 38.4%
 - Black 88.0% / 24.9%

In the Criminal Justice System

| | | | | | | |
|------------|------------------|----------|--|--------------|--------------------|--------------|
| Open Cases | Felony Referrals | Declines | Filings | Dispositions | Historical Summary | Demographics |
| | | | The path to better race & ethnicity data | Age & Gender | Victim Data | |

Defendants - Race and Ethnicity

Felony Referrals: displayed by race of persons with a criminal case referred in against them in the noted year. 2021 **Filings:** displayed by race of persons with a criminal case filed against them in King County Superior Court in the noted year.



For the race/ethnicity and gender of defendants the KCPAO must rely entirely on what law enforcement reports. The KCPAO's ethical and legal responsibilities prohibit us from speaking directly with defendants in criminal cases. Over 30 separate law enforcement agencies submit cases to the KCPAO; each of those agencies has separate policies and systems for collecting demographic data, which can result in varying levels of reporting.

Law enforcement currently reports seven categories of race/ethnicity: White/Caucasian, Black/African American, Asian/Pacific Islander, American Indian/Alaska Native, Hispanic/Latino, Unknown, Other, and no value at

Source: Data Dashboard. King County. <https://kingcounty.gov/depts/prosecutor/criminal-overview/CourtData.aspx>. Last accessed 1/3/2023.



A Word on Societal Context

The United States of America was founded on hierarchical principles that placed land-owning, white men above everyone else.

Washington has not, historically, been a haven of racial equality.

A Word on Societal Context

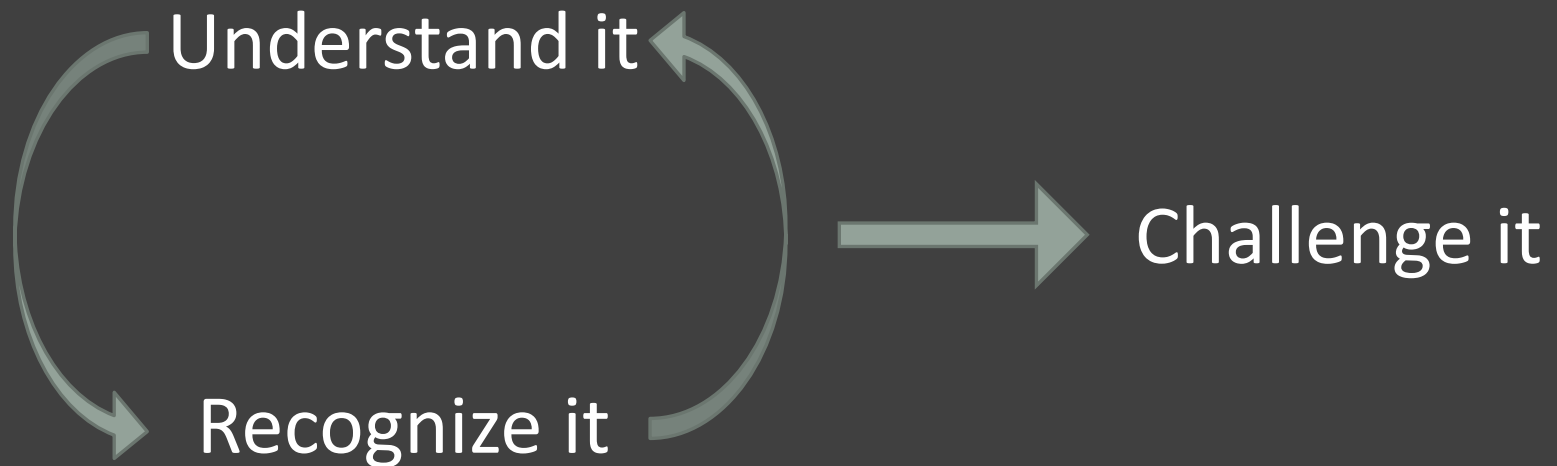
Everyone here needs to be cognizant of not just explicitly racist language, but coded language and inuendo:

Questions/statements regarding immigration and other political matters.

Perpetuating stereotypes.

Othering through dismissive attitudes and actions.

Othering



Understanding the Law

Statutory

-RCW 2.36

- Competency to serve / excusals of unfit individuals.
- Compilation of Jury Source List and Master Jury Lists.

Case Law

- o Taylor v. Louisiana, 419 U.S. 522, 95 S.Ct. 692 (1975).
- o Duren v. Missouri, 439 U.S. 357, 99 S.Ct. 664 (1979).
- o Berghuis v. Smith, 559 U.S. 314, 130 S.Ct. 1382 (2010).
- o State v. Rivers, No. 100922-4 (Wash. Sup. Ct).
- o GR 18
- o GR 31

Standing

You have standing.

*Taylor, 419 U.S. at 526-29.

Duren v. Missouri Review

To make out the **prima facie case**, the party must show:

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Key Distinctions

Not all legal issues encompassing race are the same.

Key Distinctions

Batson v. Kentucky

Equal Protection Claim

During Voir Dire

Discriminatory Intent

Duren v. Missouri

6A – Impartial Jury

Before Voir Dire

**No Discriminatory
Intent**

Key Distinctions

Don't let a judge confuse the issues.

How is a Venire Jury Selected?

It is the policy of this state that all persons selected for jury service be selected at random from a fair cross section of the population of the area served by the court, and that all qualified citizens have the opportunity in accordance with chapter 135, Laws of 1979 ex. sess. to be considered for jury service in this state and have an obligation to serve as jurors when summoned for that purpose.

RCW 2.36.080(1)

Jury Source Lists

**Department of
Licensing**

Secretary of State

**Washington Technology
Solutions**

**Administrative Office of
the Courts**

Jury Source Lists

**Administrative Office of
the Courts**



Counties

Jury Master List

Counties



?

Jury Master Lists and the Counties

There are no statutes, court rules, or opinions in Washington that allows inspection of the Jury Master List as a matter of right. See GR 31(j) and (k).

Counties use 3rd party vendors to manage Jury Master Lists and summons.

There are no rules or laws that require these vendors or their products to be audited.

-Random?

-Duplicate deletions accurate?

Counties Summon Jurors

Counties use their jury management software to produce summons for potential jurors.

Random?

Number is policy based on the jurisdiction

Potential jurors may be excused or deferred based on certain criteria – typically at the Clerk’s discretion.

The Data

Sources:

U.S. Census Bureau

Washington Office of the Secretary of State

Washington Office of Financial Management

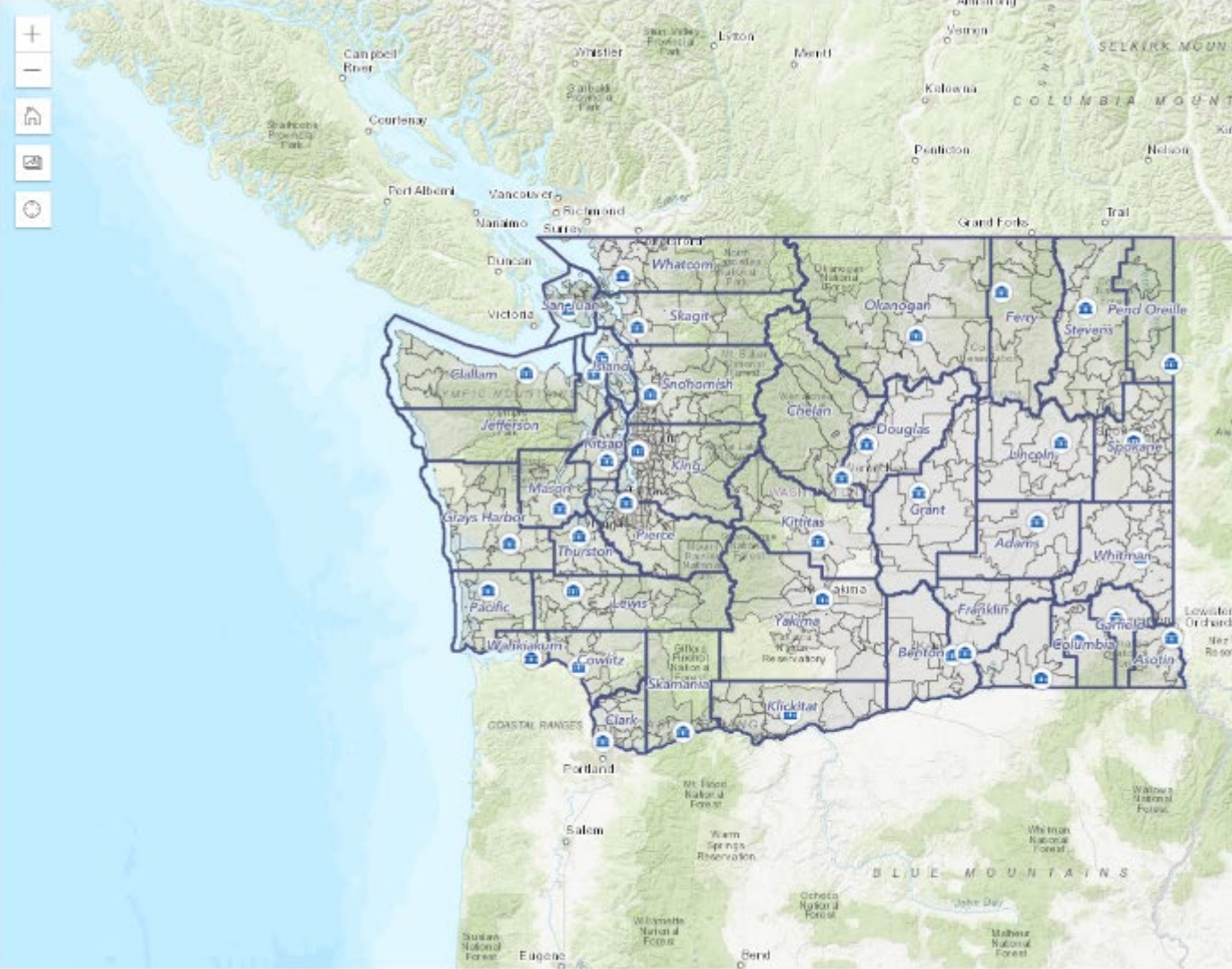
The Data

Turning to the ZIP Code Mapping Tool

<https://wa-geoservices.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f5e24454b8b3441ba252479ef33f6bc3>

Legend

- Superior Court Locations
- Public Defense Office Locations
- Demographic Data
 - Voter Registration Data
 - Demographics by ZIP Code



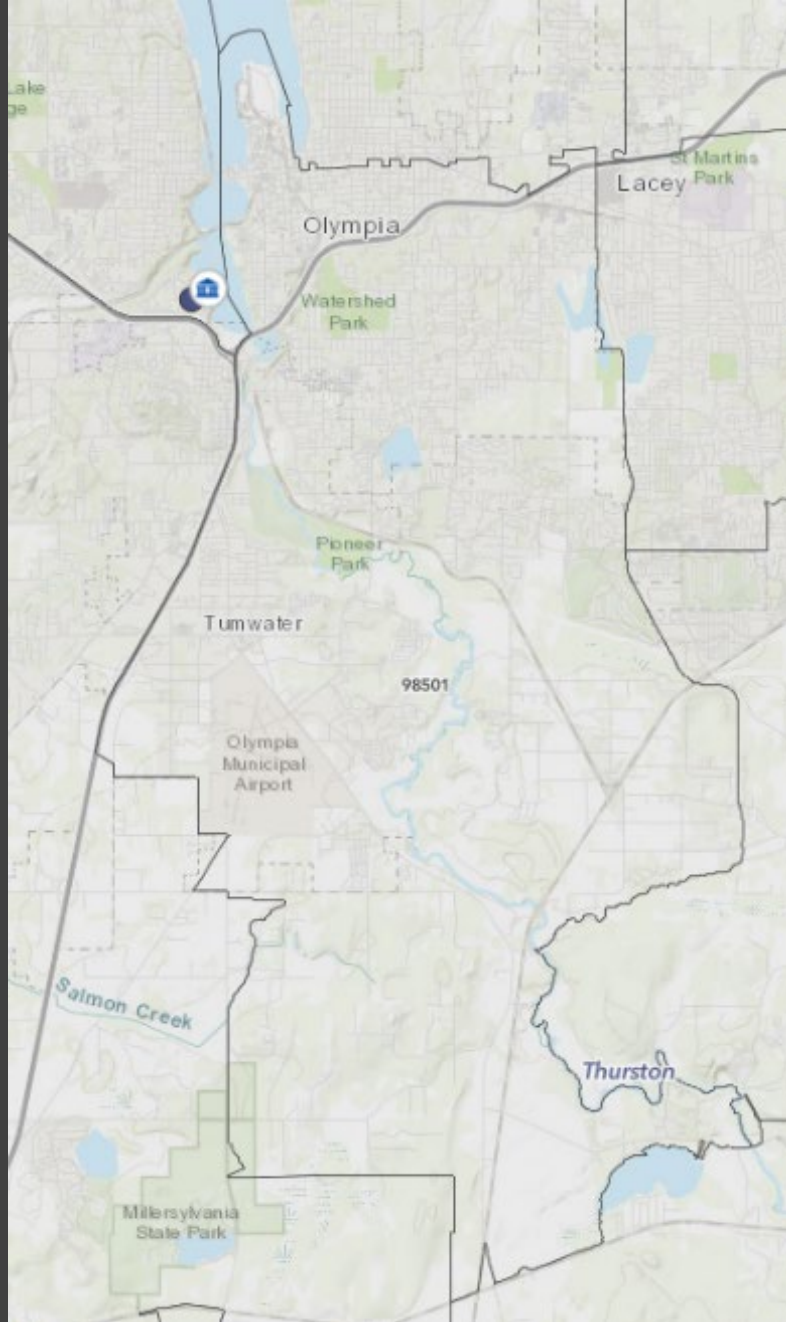
Esi, HERE, Garmin, FAO, NOAA, USGS, EPA, NPS | WA Office of Financial Management, WaTech, US Census | WA Secretary of State, WaTech | WaTech



ZIP Codes

ZIP Codes are used by the USPS. There is no geographic mapping.

Census Bureau uses ZIP Code Tabulation Areas to geographically map ZIP Codes associated with residential areas.





Info

Voter Registration Data: Pierce County

Zoom

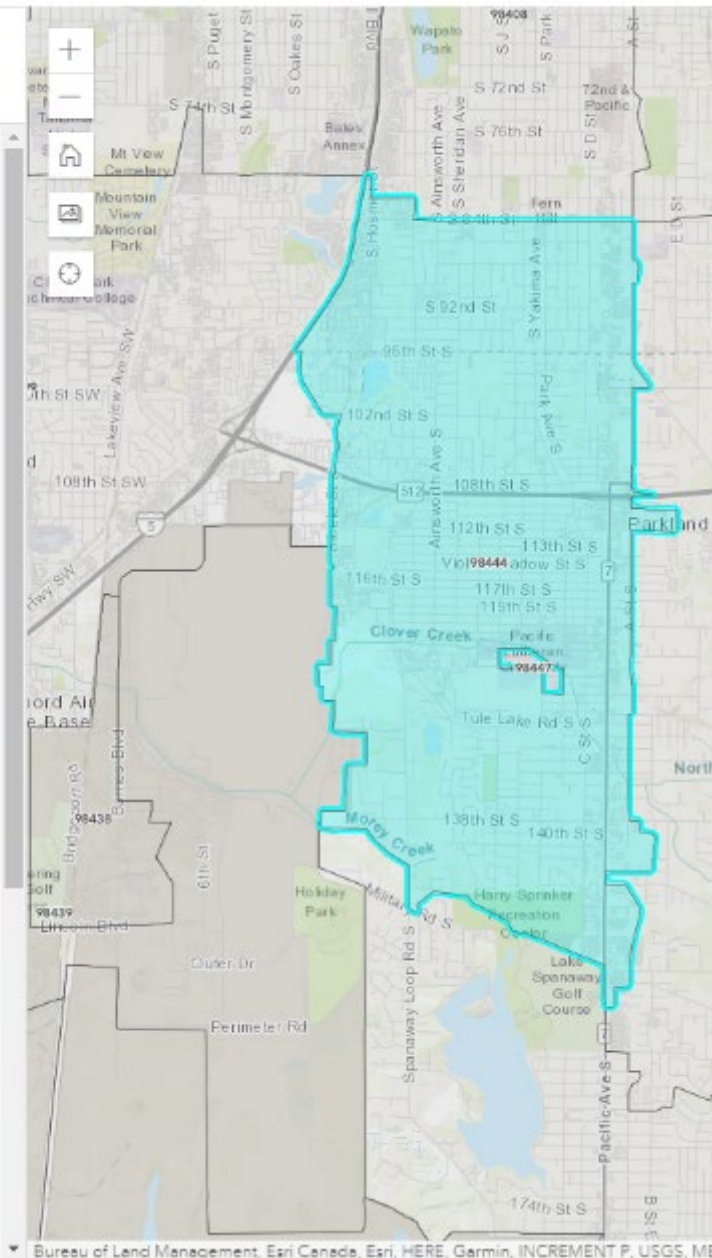
| | |
|----------------------------|--------------------------------------|
| County Name | Pierce County |
| 18-24 | 50,110 |
| 25-34 | 94,366 |
| 35-44 | 101,396 |
| 45-54 | 86,555 |
| 55-64 | 91,292 |
| 65 and older | 126,814 |
| Unknown Age | 0 |
| Total Population by Age | 550,533 |
| Female | 280,651 |
| Male | 258,794 |
| Other | 11,088 |
| Total Population by Gender | 550,533 |
| Active | 550,533 |
| Inactive | 72,231 |
| Total Population by Status | 622,764 |
| Report Name | voter_registration_Pierce County.pdf |

Voter Registration Report

Click to open the PDF report.



[voter_registration_Pierce County.pdf](#)



Info

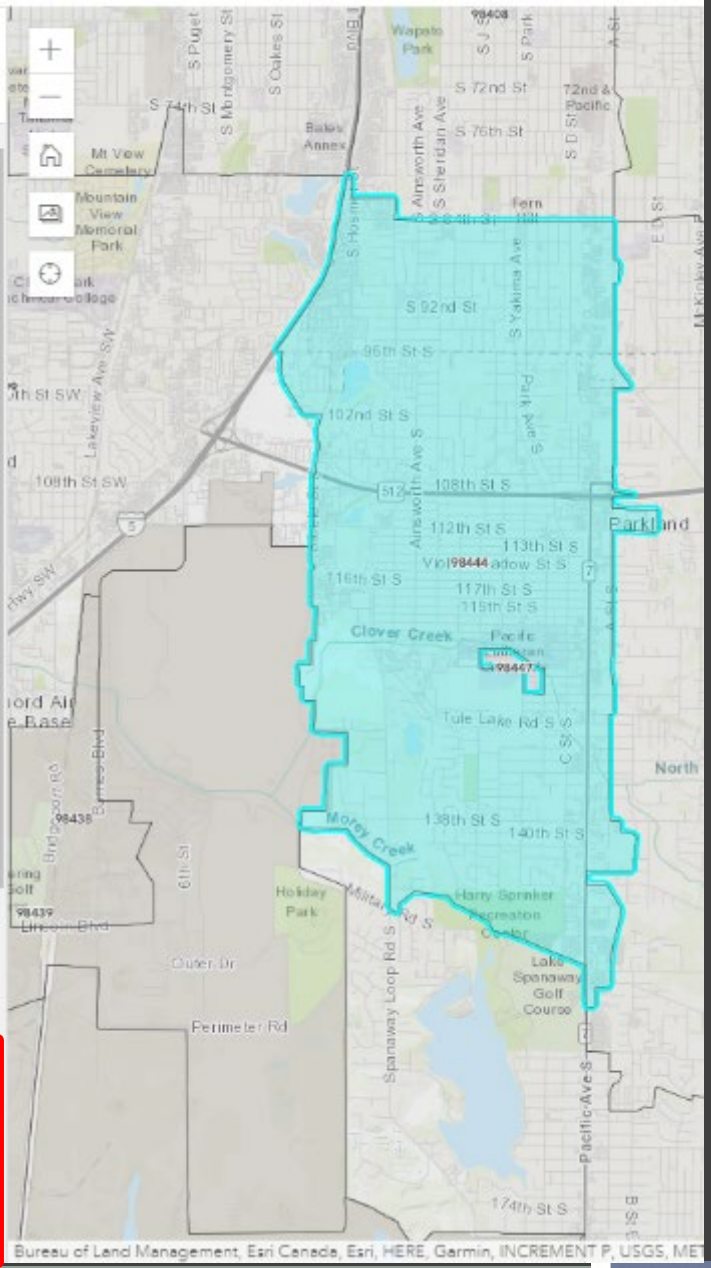
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 [voter_registration_Pierce County.pdf](#)



Voter Registration Data

Pierce County

Updated as of:
November 1, 2022

Registered Voters by Age

18-24: 50110
25-34: 94366
35-44: 101396
45-54: 86555
55-64: 91292
65+: 126814

Unknown: 0

Total: 550533

Registered Voters by Gender

Male: 258794
Female: 280651
Other: 11088

Total: 550533

Voter Registration by Status

Active: 550533
Inactive: 72231

Total: 622764



Created using data from WA Secretary of State
<https://www2.sos.wa.gov/elections/research/county-registration-counts.aspx>

Washington State
Office of Public Defense

Info

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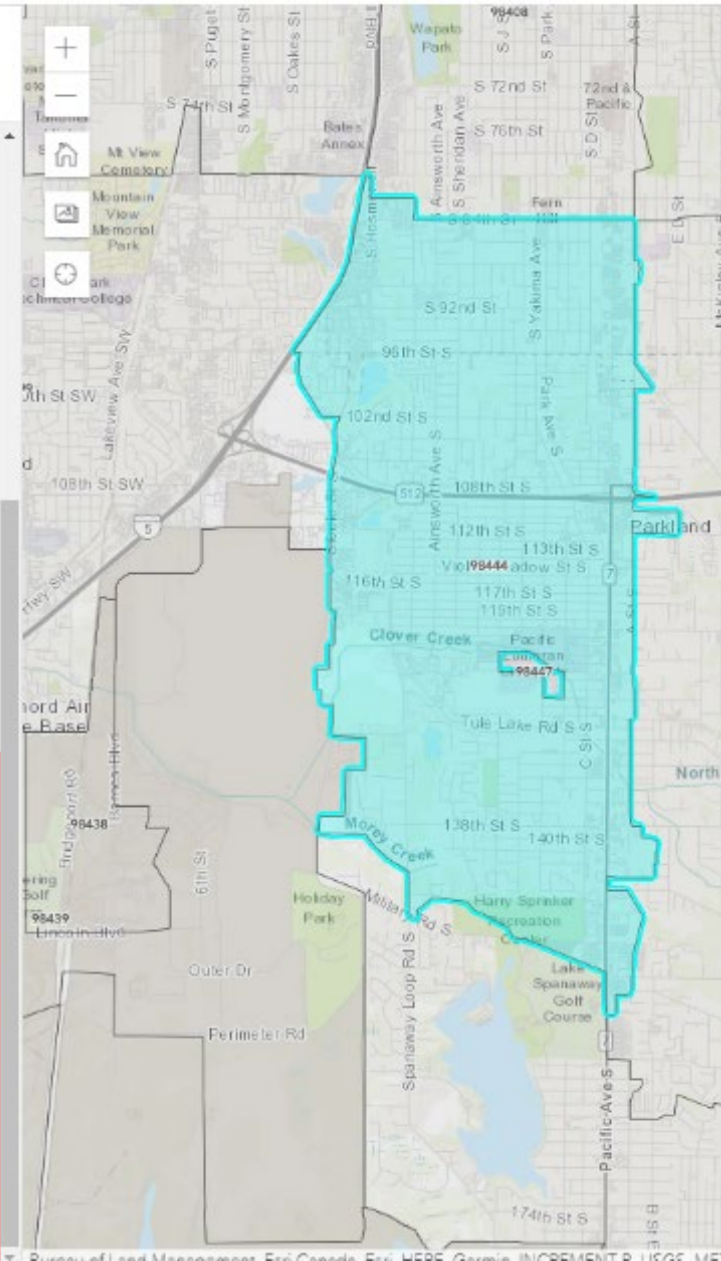
Demographics by Zipcode: 98444

Zoom

| | |
|-------------------------|-----------------------------|
| Zipcode Tabulation Area | 98444 |
| Report Name | demographics_zcta_98444.pdf |

Demographics by Zipcode Report
Click to open the PDF report.

[demographics_zcta_98444.pdf](#)



Demographics by Zip Code Tabulation Area

98444

| RACE | EDUCATIONAL ATTAINMENT ² | | GENDER | AGE | | | | | | | | | | POPULATION ESTIMATE TOTALS | | | | | | |
|--|-------------------------------------|-----|--------|------------|-----|------------|-----|------------|-----|------------|-----|------------|-----|----------------------------|-----|---------------|--------------|---------------|--------------|------------------------------------|
| | | | | AGE: 18-24 | | AGE: 25-34 | | AGE: 35-44 | | AGE: 45-54 | | AGE: 55-64 | | AGE: 65+ | | GENDER TOTALS | | RACE TOTALS | OTHER TOTALS | |
| American Indian/ Alaska Native | 21 | 11% | Male | 42 | 32% | 9 | 7% | 27 | 21% | 16 | 12% | 37 | 28% | 0 | 0% | 131 | 69.3% | 189 | 1% | Total Population 29,230 |
| | | | Female | 19 | 33% | 0 | 0% | 11 | 19% | 6 | 10% | 0 | 0% | 22 | 38% | 58 | 30.7% | | | |
| Asian | 443 | 15% | Male | 177 | 15% | 217 | 18% | 178 | 15% | 121 | 10% | 300 | 25% | 203 | 17% | 1,196 | 40.4% | 2,964 | 10% | |
| | | | Female | 197 | 11% | 285 | 16% | 144 | 8% | 353 | 20% | 338 | 19% | 451 | 26% | 1,768 | 59.6% | | | |
| Black | 668 | 14% | Male | 508 | 19% | 620 | 23% | 538 | 20% | 647 | 24% | 328 | 12% | 72 | 3% | 2,713 | 57.1% | 4,751 | 16% | |
| | | | Female | 235 | 12% | 253 | 12% | 377 | 19% | 388 | 19% | 547 | 27% | 238 | 12% | 2,038 | 42.9% | | | |
| Hispanic/Latino Origin | 267 | 7% | Male | 546 | 29% | 442 | 23% | 523 | 28% | 290 | 15% | 36 | 2% | 52 | 3% | 1,889 | 49.1% | 3,848 | 13% | |
| | | | Female | 498 | 25% | 658 | 34% | 514 | 26% | 241 | 12% | 31 | 2% | 17 | 1% | 1,959 | 50.9% | | | |
| Native Hawaiian/ Other Pacific Islander | 57 | 5% | Male | 49 | 9% | 74 | 14% | 155 | 30% | 209 | 40% | 22 | 4% | 13 | 3% | 522 | 45.5% | 1,146 | 4% | |
| | | | Female | 21 | 3% | 132 | 21% | 155 | 25% | 253 | 41% | 63 | 10% | 0 | 0% | 624 | 54.5% | | | |
| Some other Race¹ | 142 | 8% | Male | 197 | 26% | 185 | 24% | 286 | 37% | 59 | 8% | 21 | 3% | 21 | 3% | 769 | 44.9% | 1,713 | 6% | |
| | | | Female | 279 | 30% | 285 | 30% | 247 | 26% | 118 | 13% | 15 | 2% | 0 | 0% | 944 | 55.1% | | | |
| Two or more Races² | 208 | 9% | Male | 502 | 37% | 357 | 26% | 116 | 8% | 274 | 20% | 65 | 5% | 62 | 5% | 1,376 | 58.5% | 2,352 | 8% | |
| | | | Female | 292 | 30% | 218 | 22% | 221 | 23% | 164 | 17% | 68 | 7% | 13 | 1% | 976 | 41.5% | | | |
| White | 1,972 | 16% | Male | 488 | 9% | 1,124 | 20% | 1,185 | 21% | 901 | 16% | 955 | 17% | 1,039 | 18% | 5,692 | 46.4% | 12,267 | 42% | |
| | | | Female | 888 | 14% | 1,204 | 18% | 990 | 15% | 890 | 14% | 1,081 | 16% | 1,522 | 23% | 6,575 | 53.6% | | | |

Data Source:
All data taken from the U.S. Census Bureau uses the American Community Survey (ACS) 5-Year study. ZIP Code Tabulation Areas (ZCTAs) are generalized areal representations of United States Postal Service (USPS) ZIP Code service areas.

98444



Additional notes:

¹Any other (perceived or not) race that is not White, Black, American Indian or Alaska Native, Native Hawaiian or other Pacific Islander, Asian, or Two or more races. Many Latinos identify with this, as Latino or Hispanic is not a race but an ethnicity. Many Middle Eastern descents also identify with this, despite the U.S. Government classifying people from the Middle East as "White" (OFM, PL 94-171).

²Two or more races: "is the total of the population in the 57 specific combinations of two or more races" (OFM, PL 94-171).

³Educational attainment is defined as possessing a Bachelor's degree or higher.

Created using data from WA Secretary of State, WA Office of Financial Management, and the ACS 2020 Census Data for:



Race Categorizations

Categorizations are defined by U.S. Census Bureau standards.

White

**Black or African
American**

**American Indian
or Alaska Native**

Asian

**Native Hawaiian
or Other Pacific
Islander**

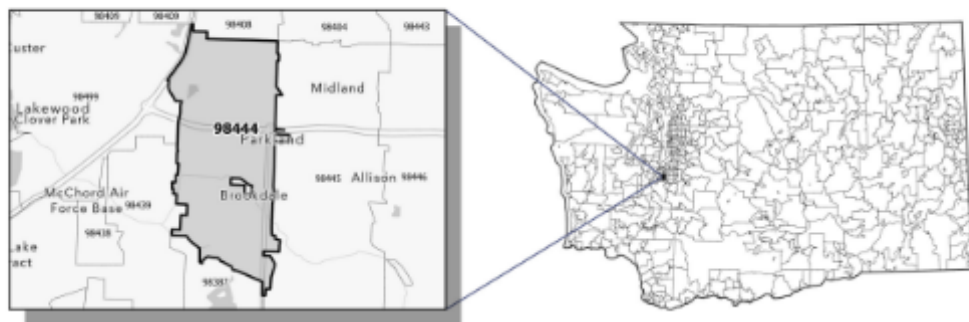
Demographics by Zip Code Tabulation Area

98444

| RACE | EDUCATIONAL ATTAINMENT ² | | GENDER | AGE | | | | | | | | | | POPULATION ESTIMATE TOTALS | | | | | | |
|--|-------------------------------------|-----|--------|------------|-----|------------|-----|------------|-----|------------|-----|------------|-----|----------------------------|-----|---------------|--------------|---------------|--------------|------------------------------------|
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| | | | Female | 498 | 25% | 658 | 34% | 514 | 26% | 241 | 12% | 31 | 2% | 17 | 1% | 1,959 | 50.9% | | | |
| Native Hawaiian/ Other Pacific Islander | 57 | 5% | Male | 49 | 9% | 74 | 14% | 155 | 30% | 209 | 40% | 22 | 4% | 13 | 3% | 522 | 45.5% | 1,146 | 4% | |
| | | | Female | 21 | 3% | 132 | 21% | 155 | 25% | 253 | 41% | 63 | 10% | 0 | 0% | 624 | 54.5% | | | |
| Some other Race¹ | 142 | 8% | Male | 197 | 26% | 185 | 24% | 286 | 37% | 59 | 8% | 21 | 3% | 21 | 3% | 769 | 44.9% | 1,713 | 6% | |
| | | | Female | 279 | 30% | 285 | 30% | 247 | 26% | 118 | 13% | 15 | 2% | 0 | 0% | 944 | 55.1% | | | |
| Two or more Races² | 208 | 9% | Male | 502 | 37% | 357 | 26% | 116 | 8% | 274 | 20% | 65 | 5% | 62 | 5% | 1,376 | 58.5% | 2,352 | 8% | |
| | | | Female | 292 | 30% | 218 | 22% | 221 | 23% | 164 | 17% | 68 | 7% | 13 | 1% | 976 | 41.5% | | | |
| White | 1,972 | 16% | Male | 488 | 9% | 1,124 | 20% | 1,185 | 21% | 901 | 16% | 955 | 17% | 1,039 | 18% | 5,692 | 46.4% | 12,267 | 42% | |
| | | | Female | 888 | 14% | 1,204 | 18% | 990 | 15% | 890 | 14% | 1,081 | 16% | 1,522 | 23% | 6,575 | 53.6% | | | |

Data Source:
All data taken from the U.S. Census Bureau uses the American Community Survey (ACS) 5-Year study. ZIP Code Tabulation Areas (ZCTAs) are generalized areal representations of United States Postal Service (USPS) ZIP Code service areas.

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Additional notes:

¹Any other (perceived or not) race that is not White, Black, American Indian or Alaska Native, Native Hawaiian or other Pacific Islander, Asian, or Two or more races. Many Latinos identify with this, as Latino or Hispanic is not a race but an ethnicity. Many Middle Eastern descents also identify with this, despite the U.S. Government classifying people from the Middle East as "White" (OFM, PL 94-171).

²Two or more races: "is the total of the population in the 57 specific combinations of two or more races" (OFM, PL 94-171).

³Educational attainment is defined as possessing a Bachelor's degree or higher.

Created using data from WA Secretary of State, WA Office of Financial Management, and the ACS 2020 Census Data for:



When to Bring a Motion

Before Voir Dire examination begins.*

Relief Requested

More venire members

Change of venue

Mistrial

Dismissal

Challenge the presumption that this is a fair cross-section and make the record for appeal.

Link to the OPD Zip Code Mapping Tool:

<https://arcg.is/0S8un5>

**Geoffrey Hulseley
Managing Attorney,
Public Defense Improvement Program
(360) 586 - 3164 ext. 147**

geoffrey.hulseley@opd.wa.gov
