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(Court of Appeals No. 83243-3-I)

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

CHRISTOPHER GATES,

Petitioner.

MEMORANDUM OF *AMICI CURIAE*
THE NATIONAL ASSOCIATION OF CRIMINAL DEFENSE
LAWYERS AND THE COALITION FOR PRIOR
CONVICTION IMPEACHMENT REFORM IN SUPPORT OF
PETITION FOR REVIEW

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STATEMENT OF IDENTITY AND INTEREST

The National Association of Criminal Defense Lawyers (NACDL) is a non-profit voluntary professional bar association that works on behalf of criminal defense attorneys to ensure justice and due process for those accused of crime or misconduct. NACDL is the only nationwide professional bar association for public defenders and private criminal defense lawyers, with tens of thousands of members and affiliates throughout the country. This case presents a question of critical importance to the fair administration of justice and will provide needed guidance to criminal defense lawyers, their clients, prosecutors, and lower courts.

The Coalition for Prior Conviction Impeachment Reform (Coalition) is a group of law professors who study this topic. Collectively, the Coalition's scholarly work has criticized this form of evidence for, among other things, its low probative value, extreme prejudice, racial injustice, and silencing of witnesses. The Coalition was formed so that its academic

research could help bring about change. The Coalition has an interest in this case, which brings up the issues just described and centers on a particularly misguided and problematic interpretation of ER 609.

SUMMARY OF ARGUMENT

Robbery is not a crime of dishonesty. Its introduction for impeachment purposes carries an extraordinarily high risk of unfair prejudice, while its probative value on truthfulness is *de minimis*. For these and other reasons, as applied to criminal defendants, ER 609 violates Article I, Section 22 of Washington's Constitution. Mr. Gates thoroughly presented these evidentiary issues both at trial and on appeal, making this case a perfect vehicle for addressing them. Contrary to the State's Answer, addressing issues raised in cases by interpreting the Constitution, statutes, and court rules is central to this Court's mandate. *See, e.g., In the Matter of The Det. of D.F.F.*, 172 Wn.2d 37, 40 (2011) (“[t]he constitutionality of a court rule

is a question of law.”) The Court should grant review to address the critical issues presented here.

ARGUMENT

I. ER 609 Carries an Extraordinarily High Risk of Unfair Prejudice, while *Ray*'s Holding That Prior Theft Crimes Are Probative of Truthfulness Is a Historical Anachronism Contradicted by Empirical Research

In *State v. Ray*, this Court held that evidence of theft crimes is admissible under ER 609(a)(2), reasoning that admitting prior convictions for theft would enlighten juries about defendants' truthfulness. 116 Wn.2d 531, 545 (1991) (holding “[t]he act of taking property is positively dishonest,” and stating “[t]he sole purpose of impeachment evidence is to enlighten the jury with respect to the defendant's credibility as a witness.”). That premise is flawed.

Prior convictions introduced under ER 609 carry an extraordinarily high risk of unfair prejudice. Research shows that rather than enlightening the jury about the defendant's credibility, prior conviction evidence simply lowers the burden

on the prosecution: “The evidence against a defendant with a prior record appears stronger to the jury.” Theodore Eisenberg & Valerie P. Hans, *Taking a Stand on Taking the Stand: The Effect of a Prior Criminal Record on the Decision to Testify and On Trial Outcomes*, 94 Cornell L. Rev. 1353, 1359-61 (2009). When defendants testify in their own defense, jurors are unable to avoid forbidden propensity reasoning, *i.e.*, “if they did it before, they must have done it this time,” or “if they did it before, they ought to be locked up this time.” Such reasoning may lead to conviction even where the prosecution has not met its burden of proof. *See, e.g., id.* at 1371, 1373, 1381-83.

This Court has recognized the profoundly prejudicial nature of prior conviction evidence. *See, e.g., State v. Burton*, 101 Wn.2d 1, 17-24 (1984) (Brachtenbach, J., dissenting); *State v. Garcia*, 179 Wn.2d 828, 847 (2014); *State v. Newton*, 109 Wn.2d 69, 70 (1987) (“Reference to prior crimes for impeachment purposes in a criminal trial has extraordinary potential for misleading and confusing a jury into believing it is

being told that defendant is a ‘bad’ person and therefore guilty of the crime charged”); *State v. Vazquez*, 198 Wn.2d 239, 252-53 (2021) (“Generally speaking, evidence of prior felony convictions is...inadmissible against a defendant because it is not relevant to the question of guilt yet very prejudicial, as it may lead the jury to believe the defendant has a propensity to commit crimes”). The risk of prejudice cannot be cured by limiting instructions. *State v. Alexis*, 95 Wn.2d 15, 20 (1980); *Burton* at 18-21 (Brachtenbach, J., dissenting); *State v. Jones*, 101 Wn.2d 113, 120-23 (1984).

Prior conviction evidence is not only highly prejudicial, it has little if any probative value on truthfulness. Systemic inequalities burden a defendant’s ability to go to trial, forcing defendants into plea arrangements that may not reflect actual events. See Anna Roberts & Julia Simon-Kerr, NACDL Report, *Prior Conviction Impeachment: The Need for Reform* at 4

(2023).¹ As a result of inconsistent law enforcement practices and prosecutorial discretion, when two defendants have engaged in the same prior conduct, one may have a prior conviction while the other may not. *Id.* at 4-5. Convictions are thus flawed metrics of character.

Empirical research demonstrates this lack of probative value. *Id.* at 4-7. Personality researchers have sought to identify characteristics or behavior that predict lying. That research suggests that to predict witnesses' propensity for lying on the stand, fact-finders would need granular information about them, such as their prior experience and personality traits, whether they believe they will be detected in a lie, and how they have responded to similar situations in the past. *Id.* at 5-6. Without additional information of this sort, even convictions for crimes traditionally thought of as bearing directly on truthfulness—like

¹ Available at <https://strengthenthesixth.org/focus/PRIOR-CONVICTION-IMPEACHMENT-THE-NEED-FOR-REFORM> (last visited Jan.16, 2024).

forgery or embezzlement—cannot assist factfinders in accurately predicting whether a witness will lie in court. *Id.* at 9.

The notion that robbery in particular is a crime of dishonesty is rooted not in science but in nineteenth-century honor norms. Julia Simon-Kerr, *Credibility by Proxy*, 85 G.W. L. Rev. 152, 161-66 (2017). These norms were premised on the idea that only people of certain status, or who behaved in particular ways, were credible and thus worthy of belief. *Id.* at 161-83. By the same token, people who lacked status or who behaved in ways considered immoral were not worthy of belief. *Id.* These outdated ideas about the types of people who should and should not be believed are unfortunately still reflected in facets of modern impeachment jurisprudence—including the admission of theft-related convictions to attack credibility. *Id.* at 168-71.

Ray rests on the overbroad premise that taking property is dishonest. But interpreting “dishonesty” this broadly sweeps in

any legal violation, since any violation can be characterized as a breach of trust. *See United States v. Brackeen*, 969 F.2d 827 (9th Cir. 1992). Federal courts have found that Congress intended a narrower definition of dishonesty with the enactment of Federal Rule of Evidence 609(a)(2), the model for ER 609. *Ray*, 116 Wn.2d at 552 (Dolliver, J. concurring & dissenting). Under the narrower federal definition, dishonesty is characterized by “deceitful behavior,” and robbery does not qualify. *Id.*; *see also, e.g., United States v. Smith*, 551 F.2d 348, 363 (D.C. Cir. 1976) (“There is no deceit in armed robbery. You ... walk up to the counter of the cashier and say, ‘this is a holdup; give me your money.’”); *State v. Broadnax*, 414 S.C. 468, 476, 779 S.E.2d 789, 793 (2015) (holding robbery is not a crime of dishonesty). The concept of *crimen falsi*—that certain crimes can be categorized as *per se* probative of dishonesty—is itself problematic.² At minimum, it should be limited to crimes

² Scholars have pointed to the general doctrinal confusion and inconsistency surrounding efforts to determine which crimes

“characterized by an element of deceit or deliberate interference with a court’s ascertainment of truth.” *See, e.g., State v. Bruce*, 779 P.2d 646, 655 (Utah 1989). That does not include robbery.

II. Precedent and Momentum Support Revisiting *Ray* and the Use of Prior-Conviction Impeachment More Generally

Three states now prohibit impeaching defendants through prior convictions: Hawai’i,³ Kansas⁴ and Montana.⁵ Montana, indeed, bars prior-conviction impeachment of all witnesses, not just defendants. All three states have cited the risk of chilling testimony. *See Santiago*, 53 Haw. at 258; *State v. Werkowski*, 556 P.2d 420, 423 (Kan. 1976); *State v. Minor*, 407 P.2d 242, 245 (Kan. 1965) (Fontron, J., dissenting); *see also* Mt. R. Evid. 609 Commission’s Comment.

“involve dishonesty.” Simon-Kerr, *Credibility by Proxy*, 85 G.W. L. Rev. at 196-203.

³ *State v. Santiago*, 53 Haw. 254 (1971); Haw. R. Evid. 609.

⁴ Kan. Stat. Ann. §60-421. Both Kansas and Hawai’i contain exceptions for defendants who themselves introduce testimony to establish their credibility.

⁵ Mont. R. Evid. 609.

Numerous judges, scholars, and experts have also called for a ban on prior conviction impeachment, at least of criminal defendants.⁶ *See Burton*, 101 Wn.2d at 23 (Brachtenberg, J., dissenting); *State v. White*, 43 Wn. App. 580, 588 (1986) (Williams, J, concurring); Montré D. Carodine, “*The Mis-Characterization of the Negro*”: *A Race Critique of the Prior Conviction Impeachment Rule*, 84 Ind. L.J. 521, 585 (2009). In recent developments, the Coalition was formed in 2021 with a mission to bridge the gap between scholarly findings on prior-conviction evidence and courtroom practice. In 2023, NACDL produced a critical analysis of prior conviction impeachment, focusing on Washington. Anna Roberts & Julia Simon-Kerr, *supra*. Another scholar recently proposed abolishing FRE 609. *See Jeffrey Bellin, Eliminating Rule 609 to Provide a Fair*

⁶ Given the defense’s right to confront, an ideal version of the rule might indicate that “Impeachment by prior conviction is prohibited, except where the exclusion of such evidence would violate the defendant’s constitutional rights.” *See Roberts & Simon-Kerr, NACDL Report*, at 31.

Opportunity to Defend Against Criminal Charges: A Proposal to the Advisory Committee on the Federal Rules of Evidence, Fordham L. Rev. (October 2023/forthcoming).⁷ And Oregon's intermediate appellate court has concluded that the state's prior conviction impeachment rule violates due process. *State v. Aranda*, 319 Or. App. 178 (2022).

It is no surprise that momentum for reform is growing. Judges and experts have called for a thorough analysis of the impact of racial bias in the courts. *See, e.g.*, Letter to Judiciary, Supreme Court of Washington, June 4, 2020. Scholars are scrutinizing the consequences of conviction that spring from and perpetuate notions of separateness and inferiority, *see* Anna Roberts & Julia Simon-Kerr, *Reforming Prior Conviction Impeachment*, 50 Fordham Urban L.J. 377, 397 (2023), as well as practices that contribute to the risk of wrongful conviction. *See* John H. Blume, *The Dilemma of the Criminal Defendant*

⁷ Available at SSRN, <https://ssrn.com/abstract=4617705> (last visited Jan. 16, 2024).

with a Prior Record—Lessons from the Wrongfully Convicted, 5 J. Empirical Legal Stud. 477, 493 (2008). The voices of people who have been through the criminal system have traditionally been silenced, and an acknowledgement of those vital voices is growing. *See infra* Part IV; Alexandra Natapoff, *Speechless: The Silencing of Criminal Defendants*, 80 N.Y.U. L. Rev. 1449 (2005). These developments are profoundly relevant here.

III. Academic Research Supports Mr. Gates’s Claims

In 1977, this Court rejected a constitutional challenge to the prior conviction impeachment statute that predated ER 609. *State v. Ruzicka*, 89 Wn.2d 217 (1977). But as Mr. Gates notes, subsequent research has amplified concerns about the unfair prejudice associated with prior conviction evidence. And as discussed above, limiting instructions cannot cure the risk of such prejudice. *Supra* at 5; *see also, e.g.*, Eisenberg & Hans, *Taking a Stand on Taking the Stand*, at 1371, 1373, 1381-83; *United States v. Gilliland*, 586 F.2d 1384, 1389 (10th Cir. 1978). Additional research also indicates that the prospect of

prior conviction impeachment chills testimony. *See* Blume, *The Dilemma*.⁸ Indeed, research shows that the right to trial itself is ultimately at stake. Defendants with convictions have good reason to fear that they are doomed whether they testify or not—and must therefore plead guilty. Jeffrey Bellin, *The Silence Penalty*, 103 IOWA L. REV. 395, 426 (2018).

IV. Impeachment With Prior Convictions Disproportionately Impacts Defendants of Color

Recently, this Court has distinguished itself as a trailblazer in both acknowledging and attempting to address racial inequality in Washington’s criminal legal system. *E.g.*, *State v. Hawkins*, 200 Wn.2d 477, 500 (2022) (recognizing the “judiciary’s role in perpetuating racism within the justice system and [] commit[ing] to changing that.”); *State v. Sum*, 199 Wn.2d 627, 640 (2022) (acknowledging the role race plays in police encounters); *State v. Blake*, 197 Wn.2d 170, 192

⁸ The chilling of testimony is a loss not only for defendants but also for juries, which are deprived of valuable evidence. *See* Eisenberg & Hans, *Taking a Stand on Taking the Stand*, at 1370.

(2021) (en banc) (finding drug statute unconstitutional and acknowledging its disproportionate impact on men of color); GR 37(a) (adopted for the purpose of “eliminat[ing] the unfair exclusion of potential jurors based on race or ethnicity”); *State v. Gregory*, 192 Wn.2d. 1, 22 (2018) (taking “judicial notice of implicit and overt racial bias against [B]lack defendants in this state.”). Reexamining prior conviction impeachment is consistent with this Court’s guidance, leadership, and desire to eliminate practices that perpetuate racial inequality.

Mr. Gates correctly points out that the pervasiveness of systemic racism in the criminal legal system calls into question the constitutionality of prior conviction impeachment. As this Court is aware—and research has repeatedly shown—racial disparities persist at every decision-point of the criminal legal system, whether it is traffic stops, searches, arrests, charging decisions, plea negotiations, convictions, or sentencing. *See, e.g., Valeria V. Weis, Criminal Selectivity in the United States: A History Plagued by Class & Race Bias*, 10 DePaul J. for Soc.

Just. (2017). The existence of prior convictions cannot be divorced from the racialized system of justice that produced them.

The U.S. criminal legal system has expanded rapidly due to the well-documented legacy of mass incarceration.

According to one study, the number of adults with felony convictions surged from fewer than two million in 1948 to nearly 20 million in 2010. Sarah K. S. Shannon et al., *The Growth, Scope, and Spatial Distribution of America's Criminal Class, 1948–2010*, 54 *Demography* 1795, 1811 (2017). The study estimates that more than 20% of Black adults in Washington had a felony conviction in 2010. These troubling statistics flow from “facially neutral policies that have racially disparate effects.” *Blake*, 197 Wn.2d at n.10 (2021) (citation omitted).

Charging decisions may be influenced by race. *See, e.g.*, Robert J. Smith & Justin D. Levinson, *The Impact of Implicit Racial Bias on the Exercise of Prosecutorial Discretion*, 35

Seattle U. L. Rev. 795, 806 (2012) (finding prosecutors “less likely to charge white suspects than black suspects.”). The influence of racial bias in charging decisions creates the risk that identical or similar conduct will be treated differently, with a higher likelihood of harsher charges if the accused is a person of color. Given existing racial disparities in Washington’s criminal legal system, the continued use of prior convictions compounds the harm to people of color in Washington.

CONCLUSION

The Court should grant Mr. Gates’s petition for review.

Dated: January 16, 2024

RESPECTFULLY SUBMITTED,

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/s/ Robin E. Wechkin

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DECLARATION OF SERVICE

I affirm, under the penalty of perjury that on January 16, 2024, the aforementioned document was electronically submitted through Washington State's Appellate Court Portal.

Signed in Issaquah, Washington, this 16th day of January 2024.

/s/ Robin E. Wechkin

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