THE PRETRIAL REPORTER

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Executive Summary

This issue of The Pretrial Reporter contains the following:

National Notes:

- Pretrial services takes seed in West Virginia.
- Validated pretrial risk assessment procedures in Summit County, Ohio, along with other innovations, credited with bringing jail population under control.
- New pretrial supervision program in Delaware County, Indiana saves over $400,000 in jail bed space rental costs in first year.
- Recession is taking a large toll on the bail bonding industry in Indiana.
- Bail bonding industry fails in attempt to cut funding to Orange County, Florida pretrial program.
- The National Association of Criminal Defense Lawyers issues a report calling for reforms of problem-solving courts.

Cases:

- Washington Court of Appeals rules that statements made to pretrial officer during interview for pretrial release determination cannot be introduced as evidence in the trial.
- California Court of Appeals says that a pretrial detainee granted an emergency pass from the jail is not on personal recognizance for the purposes of sentence enhancement for crimes committed while on personal recognizance.
- New Jersey Supreme Court holds that the right to counsel in juvenile proceedings attaches at the filing of a complaint.
- Kentucky Court of Appeals rules that a pretrial diversion agreement cannot be revoked for non-compliance after the diversion period has expired.

"It saves money and it's common sense. It does work and there is evidence it works."

National Notes

NEW WEST VIRGINIA LAW ESTABLISHES FIVE PRETRIAL SERVICES PILOT PROJECTS

Several years ago, counties in West Virginia reached an agreement with the state to turn their jails over to the state. Under the agreement, the jails would function as state-run regional facilities. Counties would be spared the costs of operating their own jails. In exchange, they would pay a daily rate to the state for every inmate they sent to a regional jail. Designed to be a cost-saving measure for revenue-starved counties, the agreement actually added to costs for most counties.

West Virginia Governor Joe Manchin III recently signed a bill designed to relieve budget pressures on both the state and the counties. The new law authorizes the West Virginia Supreme Court of Appeals to establish up to five pretrial services program pilot projects in the state. The projects are to be based upon a pretrial program that was implemented in Brooke County, West Virginia earlier this year. As a result of that program, Brooke County's regional jail inmates have fallen from an average of 40 a day to 15.

According to Jim Lee, Chief Probation Officer for Brooke County, the county pays $5 a day for every defendant supervised by the pretrial program, compared to $48.50 a day the county must spend to send a person to one of the state-run regional jails. "It saves the county commission on the regional jail bills and it helps on the overcrowding of the regional jails," said Judge Michael J. Gaughan, referring to the Brooke County pretrial program. "It saves money and it's common sense. It does work and there is evidence it works."

The bill was pushed by West Virginia Supreme Court Justices Robin Jean Davis and Thomas McHugh, who attended the bill signing ceremony. "The population of our jails and prisons is rapidly increasing," said Governor Manchin in signing the bill. "We are dealing with that every day on budget matters. When you have all branches of government working for the citizens of the state, it speaks volumes. This is the good that comes out of all of us working together." (West Virginia Supreme Court of Appeals, Press Release, 5/20/09.)

"The big fear, of course, initially was that all these people would be let out and criminals would commit more crimes, and that really has not happened."

ENHANCED PRETRIAL PROGRAM CREDITED WITH HELPING TO FIX JAIL CROWDING PROBLEM IN OHIO COUNTY

Summit County, Ohio has had a long history of dealing with jail crowding. In 1973, an inmate filed a suit against the jail over conditions at the crowded facility. As a result, the county was forced to spend $26 million on a new jail. Five years later, the county spent another $9 million on an addition, and still had to double bunk inmates. With a capacity of 670, the jail reached highs of 800. "We were getting nowhere," said Sheriff Drew Alexander, who was elected in 2000. "Our fear when we first came in was how long it would be before the officers waive the white flag and say, 'We can't beat them.'" After the implementation of several changes, however, including an enhancement of the pretrial services program, the jail is currently operating below capacity.

When the pretrial services program implemented a validated risk assessment instrument, it began recommending more defendants for release. "The big fear, of course, initially was that all these people would be let out and criminals would commit more crimes, and that really has not happened," said Common Pleas Judge Elinore Marsh Stormer.

The county also formalized collaboration within the justice system, hired a jail population manager, and developed sentence alternative programs. "They are to be commended for what they have done in Summit County," said Butch Hunyadi, chief of the Bureau of Adult Detention of the Ohio Department of Rehabilitation and Correction. "You can take pride in the fact that the county as a whole has done a tremendous job at putting criminal justice as a priority." (*Beacon Journa*l, 10/19/09.)

NEW PRETRIAL PROGRAM IN INDIANA SAVES TAXPAYER MONEY

For years, Delaware County, Indiana was paying over $400,000 a year to rent space in neighboring county jails due to crowding in its own jail. In an attempt to reduce this figure, last year the county set up a pretrial supervision program within the county's probation department. Within months of the program's implementation, the county was able to stop sending its overflow inmates to other jails.

With the new pretrial supervision program in place for a year now, officials were able to calculate the annual savings realized from the program. In the 12 months before the program was started, the county had spent $412,690 in rent at other jails. In the 12 months since the program began, the rent cost had dropped to only $3,855,

for a net savings in rent of nearly $409,000. These figures do not include transportation costs, which have also been dramatically reduced.

In its first year, 197 defendants were placed in the pretrial supervision program. Program data show that 15 had their supervision revoked for non-compliance and 10 more have outstanding warrants. "If you look at 197 people, we had 25 that violated," said Delaware County Chief Probation Officer Vickie Reed. "That's pretty good." Circuit Court Judge Marianne Vorhees noted: "It's been a great program for Delaware County. Other counties are asking us about it now." (*The Star Press,* 8/26/09.)

BAIL BONDING INDUSTRY HIT HARD BY THE POOR ECONOMY

"The slow death of the bail bonding industry is forcing me to make a change."

In past recessions the bail bonding industry has thrived, as crime typically rises, creating more potential paying customers. The current recession, however, has had the opposite effect on the industry – potential clients no longer have the resources, in cash or property, to pay the bail bonding fee and to meet collateral requirements of bonding companies. This has led to sharp declines in profits for bail bonding companies, and is forcing many companies out of business.

For example, in Indiana, there are 383 licensed bail agents. According to the Indiana Department of Insurance, 40 of these agents have notified the department that they will not be renewing their licenses when they expire at the end of October. "The slow death of the bail bonding industry is forcing me to make a change," said Marion County bail agent Kate Sweeney, one of those who is getting out of the business. Many other Indiana bail agents are struggling to survive. Bondsman Mark Thompson says that his business is down 60 percent. "I am just trying to hang on," said Thompson. "I am going week-to-week these days. But it is just not worth it anymore." Leslie Sebring, a 44-year veteran of bail bonding, is taking a different approach – focusing his business on higher risk defendants. "We are writing fewer bonds," said Sebring, "but they are higher bonds."

Marion County judges have responded to the decline in the ability of defendants to meet the financial demands of commercial surety bail by ordering more ten percent deposit bails. "We wanted to make sure that we are not setting bonds so high that we are overcrowding our jail," said Marion County Superior Court Judge Robert Altice. "Some people can't even afford a thousand dollar bond." (*Indianapolis Star*, 10/20/09.)

"Our interest is public safety. The interest of the bail-bond industry is their livelihood; it's their profit margin."

FLORIDA COUNTY REJECTS ATTEMPT BY BAIL BONDING INDUSTRY TO CUT FUNDING FOR THE PRETRIAL PROGRAM

Commissioners in Orange County, Florida were faced with the task of cutting the county budget by 13.6 percent from last year's level. The bail bonding industry, seeing this as an opportunity to eliminate funding for the county's pretrial services program, sent a four-page flier to 50,000 Orange County residents urging citizens to tell commissioners to end the "wasteful" pretrial program. The flier listed a number of people who had been charged with serious offenses who had been released, and stated that taxpayers were paying for these releases.

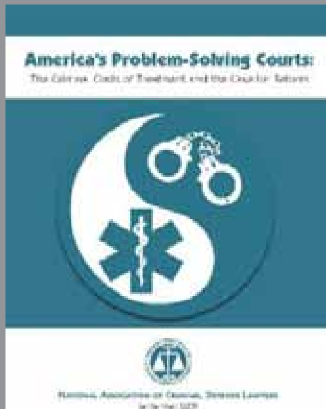
County and court officials were quick to respond, noting that all those defendants who were named in the flier could have bought their way out of jail and been out on the street even if the pretrial program was not place – by going through a bail bonding company. "Our interest is public safety," said Orange County jail chief Michael Tidwell in response to the flier. "The interest of the bail-bond industry is their livelihood; it's their profit margin." (Orlando Sentinel, 9/22/09.)

Court figures suggest why the bail bonding industry was targeting the pretrial program. In 2006, about 1,800 defendants a month used the services of a bail bonding company to get out of jail. For the past three years, that figure has averaged about 1,600 a month. At the same time, non-financial releases climbed from about 143 each month to a current monthly average of about 430.

On September 23, 2009, county commissioners were scheduled to vote on the budget. Notwithstanding the 50,000 fliers sent to county residents urging them to speak up against further funding for the pretrial program, not a single citizen of the county rose to do so at the budget meeting. Commissioners unanimously passed a budget, which contained significant cuts to other programs but included the full amount requested for the pretrial program. (*Orlando Sentinel*, 9/24/09.)

NATIONAL DEFENSE ATTORNEY ASSOCIATION WANTS REFORMS OF PROBLEM-SOLVING COURTS

The National Association of Criminal Defense Lawyers (NACDL) has released a report calling for major reforms of problem-solving courts. The report, the product of a two-year study, notes that the defense bar has been "largely on the sidelines" in the planning and implementation of problem-solving courts, "notwithstanding the profound implications of their impact on defense practices." In



"Some problem-solving courts offer opportunities and resources to those who desperately need help through programs that also protect basic due process rights."

compiling the report, a Task Force of seven defense attorneys held hearings in a number of cities around the country, hearing from 130 witnesses regarding their views on problem-solving courts, and their impact on the rights of defendants and the responsibilities of defense attorneys. Witnesses included judges, defense attorneys, prosecutors, professors, policy analysts, treatment professionals, pretrial and probation officers, and drug court participants.

Among the key recommendations of the report was that defendants should not be required to plead guilty as "a price of admission" to a problem-solving court. "When guilty pleas are required before offering treatment, (these) courts become little more than conviction mills." The report notes that a pre-plea, pre-adjudication program "preserves due process, allows defendants an opportunity to seek treatment, and provides a strong incentive for successful completion. If the defendant successfully completes the program, the charge is dismissed. If the defendant does not succeed, the traditional court process can be pursued."

Another key recommendation was that admission criteria be objective, fair, and more rational. The report described admission criteria of many problem-solving courts that are "backward or counterintuitive. For example, many drug courts exclude all violent offenders, including defendants charged with domestic violence. Excluding domestic violence offenses leads to the odd result of the domestic violence offender who gets drunk and beats his wife up checking with his probation officer once every six weeks while nonviolent offenders are appearing regularly for status hearings, giving random weekly urine samples, and attending 90 meetings in 90 days." The report also suggests that to avoid politics playing a role in the selection of admission criteria, which is typically done by prosecutors, the criteria should be drafted by a panel with broad representation of stakeholders, including judges, prosecutors, defense attorneys and social service providers.

Among the other recommendations are to assure that judges do not directly or indirectly coerce defendants to secure waiver of counsel, provide adequate time to allow defendants to consult with their attorneys to decide whether to enroll in a problem-solving court, grant immunity to any statements made by defendants while participating in problem-solving courts, develop guidelines for the fair and consistent use of sanctions for non-compliance, and prohibit ex parte communications in all instances. The report also recommended that sentences for those who fail in the problem-solving court should never exceed what would have been imposed if a standard plea were taken.

Appeals court reverses trial court decision to allow statements made to pretrial services interviewer into testimony at trial.

Despite the issues identified, the report notes that there is "enormous potential of problem-solving courts," and that "there are a number of problem-solving courts that demonstrate best practices. Some problem-solving courts offer opportunities and resources to those who desperately need help through programs that also protect basic due process rights." Looking specifically at mental health courts, the report stated that these courts "have largely done an effective job of providing integrated services, reducing recidivism, and preserving due process and fairness to participants."

A copy of the report, "America's Problem-Solving Courts: The Criminal Costs of Treatment and the Case for Reform," is available at www.nacdl.org

Cases

WASHINGTON V. DENNEY, WASHINGTON COURT OF APPEALS, DIVISION II, 37529-0, 8/25/09

Virginia Denney was being investigated in relation to a theft. During a search of her purse as part of that investigation, several pills were found, which were later identified as morphine. Denney claimed that she had found the pills in the back seat of her mother's car, and, not knowing what they were, put them in her purse until she could find the rightful owner. Denney was charged with unlawful possession of a controlled substance, in addition to theft. The arresting officer transported her to the county jail and, in accordance with county policy, stayed with Denney during the booking process. Part of that process was a medical screening conducted by jail personnel. During that screening, Denney was asked a standard question regarding drug use. She admitted, within earshot of the arresting officer, that she had taken morphine that day. A short time later, Denney was interviewed by a staff person from the pretrial services program. A standard part of the pretrial interview pertained to recent drug use, and Denney again acknowledged that she had used morphine that day.

Prior to trial on the charges, the prosecution announced its intent to rebut Denney's claim that she did not know the pills in her purse were morphine by calling the arresting officer and the pretrial services interviewer to testify that Denney had admitted using morphine the day of her arrest. Denney objected, stating that the questions asked of her by the jail medical screening and pretrial officer regarding her drug use were a "covert attempt" to solicit incriminating responses, in violation of her Miranda rights. The trial

court rejected this argument, and ruled that the statements were "highly probative" on the question of whether Denney was aware that she had morphine pills in her purse. At trial, the disputed testimony was presented, and Denney was convicted. She appealed the drug possession conviction on the grounds that the testimony of the police officer and pretrial services interviewer violated her Miranda rights.

In deciding the case, the Washington Court of Appeals noted that "the sole question on appeal is whether the trial court's determination that the booking procedure and bail questionnaire were not interrogations was clearly erroneous." The court noted that it is established precedent that routine questions asked during a booking process may not be "interrogations" under Miranda. This has led to a "routine question exception" to Miranda, allowing "background, biographical questions necessary to accomplish booking procedures….When determining if the routine question exception applies, the court asks if the questioning party should have known that the question was reasonably likely to elicit an incriminating response." The court concluded that it should have been clear that Denney's response to the questions about recent drug use would be incriminating. "Denney had been arrested for morphine possession and both the booking and bail questionnaires asked her if she had used an illegal drug in the last few days. The questions in this case invited an answer that would be a direct admission of guilt." While ruling that the questions "were reasonably likely to produce an incriminating response because they invited Denney to comment directly on the charges against her," the court acknowledged that the questions "are important in ensuring inmate safety and proper pretrial release." These legitimate purposes can only be achieved "if defendants know that their responses will not later be used against them." Given the important interests at stake in these questions, according to the court, it is the responsibility of the trial court to exclude from testimony any incriminating responses to these questions. The appeals court held that the trial court erred when it admitted Denney's statements, and reversed her drug possession conviction.

PEOPLE V ALBERTO HERNANDEZ, CALIFORNIA COURT OF APPEALS, FIFTH APPELATE DISTRICT, 2009 CAL. APP. LEXIS 1562, 9/22/09

Prior to sentencing on a 2004 felony drug conviction, the appellant Alberto Hernandez was temporarily released from custody by the trial court on what was called an "emergency pass" to allow him to visit his ailing wife on the condition that he return to court for sentencing the following week. Although Hernandez orally agreed to

An emergency pass from jail is not the functional equivalent of release on personal recognizance.

the condition, he did not return and remained at-large until 2007, when he was arrested on a new felony charge of receiving stolen property. The criminal complaint against Hernandez included an alleged enhancement on the ground that the crime of receiving stolen property was committed while he was released from custody on his own recognizance. He was found guilty as charged and the subject enhancement was found true, which increased the sentence by two years. Hernandez appealed, contending the trial court erred in finding the enhancement true because there was no evidence that he was released on his own recognizance as that term is defined under applicable California law.

Upon appeal, Hernandez argued that an emergency pass was not the equivalent of an own recognizance (O.R.) release because it served a purpose other than ensuring his return to court and, furthermore, he did not execute a written release agreement in accordance with the statute. The People responded with the argument that the emergency pass was in substance an O.R. release or the functional equivalent thereof, and therefore the statute was applicable. The Court of Appeal determined that, in addressing this case, it needed to examine what the California Legislature intended by use of the term “own recognizance” under section 12022.1.

In this case, Section 12022.1 provides that a two-year enhancement shall be added to a defendant’s sentence if a second felony offense is committed while “released from custody on a primary offense.” However, the term “primary offense” is specifically defined as “a felony offense for which a person has been released from custody on bail or on his or her own recognizance prior to the judgment becoming final, including the disposition of any appeal, or for which release on bail or his or her own recognizance has been revoked.” Accordingly, the design of the law is to punish a particular form of recidivism—namely, that of a defendant who is released from custody on bail or on an O.R. release in a pending felony case and who seizes the opportunity of his release to commit another felony.

The Court initially discussed how the primary purpose of O.R. is the practical assurance that the defendant will appear in court when his presence is required. Those who receive O.R. release must submit a signed release agreement that includes, among other things, certain express promises such as a promise to appear in court when required and a promise to abide by other reasonable conditions imposed by the court. If a defendant is released without a signed release agreement that complies with section 1318, the defendant cannot be separately punished under section 1320 for his subsequent failure to appear.

Right to counsel attaches at filing of complaint in juvenile cases.

Relying on past case law, the Court agreed that if section 1318 (O.R.) is not complied with, a defendant cannot be prosecuted under section 1320 if he/she fails to appear as promised. As expressed in *People v Jenkins*, "[Section 1318] expressly defines and delimits the conditions of release under an own recognizance.… However else it might be characterized, a release without bail which does not comply with the specific requirements of section 1318 is not a release under an own recognizance." Based on such rulings, the Court upheld the belief that the Legislature intended to make compliance with section 1318, including the necessity of a signed release agreement containing the required stipulations, an essential part of what constitutes an O.R. release. Given that sections 1320 and 12022.1 similarly refer to a defendant's O.R. release as a basis for its application, the same intent of section 1318 should apply, and thus one can not be prosecuted under 12022.1 anymore then under 1320.

Undisputed facts in the case at hand showed that section 1318 was not complied with in connection with Hernandez's release from custody, especially given that no written release agreement was ever signed as required by section 1318. Accordingly, the Court concluded that Hernandez's release did not qualify as an O.R. release under applicable law, making the enhancement findings under section 12022.1 invalid. The Court subsequently reversed and remanded the trial court's enhancement ruling.

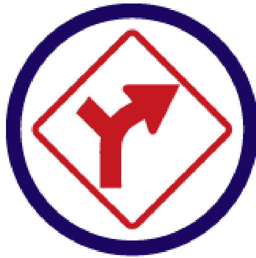
STATE OF NEW JERSEY IN THE INTEREST OF P.M.P, SUPREME COURT OF NEW JERSEY, A-63-08, 7/29/09

On February 19, 2008, a report was filed against the defendant, P.M.P., alleging that he had sexually assaulted a female five years earlier. At the time of the alleged incident, the defendant was approximately fourteen years-old, while the victim was approximately seven years-old. After interviewing the victim, a detective of the Cape May County Prosecutor's Office called P.M.P., pretending to be the victim in the conversation. According to the detective, P.M.P. believed he was talking on the phone to the victim and apologized for his conduct. Following that conversation, the detective prepared a juvenile delinquency complaint against P.M.P. for a sexual assault against someone under the age of thirteen when the defendant was more then four years older than the victim. A warrant was issued and P.M.P was arrested and brought to the Prosecutor's Office the next day, where, after waiving his Miranda rights, admitted in a statement to having sex with the victim. P.M.P appeared before the court later that morning and was ordered detained.

P.M.P. filed a motion to suppress his statement. The trial judge found that the prosecutor's filing of a juvenile delinquency complaint was the functional equivalent of an indictment, and therefore, P.M.P.'s right to counsel attached when the complaint was filed. The trial judge referred to *State v. Sanchez*, which held that after indictment, a defendant may not waive the right to counsel without approval of counsel. Subsequently, the interrogation of P.M.P. without the presence of counsel violated his Sixth Amendment Right to counsel. Upon appeal, the decision was reversed, with the Appeals Division stating that the fundamental difference between the procedures and goals of the juvenile justice system and the criminal court prohibit equating a juvenile complaint with an indictment. The defendant appealed to the N.J. Supreme Court.

The N.J. Supreme Court went on to rule that the filing of the complaint and the obtaining of a judicially approved arrest warrant by the Camden County Prosecutor's Office was a critical stage in the proceedings, and thus, under state law, P.M.P. had the right to counsel and could not waive that right except in the presence of and after consultation with his attorney counsel. Therefore, the Court found that the trial judge was correct in allowing P.M.P.'s statement to be suppressed. According to the Court, the NJ Legislature crafted the Juvenile Code to provide juveniles with all defenses available to an adult. The Code also specifically gives a juvenile the right to be represented by counsel at every critical stage of the proceedings, and "cannot waive any rights except in the presence of and after consultation with counsel and unless the parent has been afforded time to consult with the juvenile and the juvenile's counsel regarding that decision." This is supported by federal law, where the right to counsel attaches at the initiation of an adversarial judicial criminal proceeding against a defendant, which includes proceedings that are initiated through formal charge, preliminary hearing, information, indictment, or arraignment.

The Court also agreed with the reference to *Sanchez*, where it was noted that the indictment transforms the relationship between the State and defendant because the State has now represented that it has enough to establish a prima facie case and any further questioning is just to strengthen that case. In those circumstances, Miranda warnings are insufficient to inform the defendant of the nature of the charges against him, the dangers of self-representation, or the steps an attorney might take to protect his interests. In the case at hand, the significant level of involvement by the Prosecutor's Office and the judicially approved arrest warrant satisfied the "critical stage in the proceeding" necessary to invoke P.M.P.'s statutory right to counsel. Additionally, the Court turned to *In re Gault*, which stated that under the Due Process Clause, the juvenile and parents must be notified of the right to counsel.



Kentucky appeals court says missed chance by prosecutors to revoke pretrial diversion cannot be held against defendant.

TUCKER V. KENTUCKY, COURT OF APPEALS OF KENTUCKY, NO. 2007-CA-001545-MR, 9/25/09

Christopher Tucker was indicted on a charge of Flagrant Non-Support, a Class D felony. He entered a plea of guilty on that charge. On the date of the plea, the trial court placed Tucker in Kentucky's Class D Felony Pretrial Diversion Program for a period of three years. One of the conditions of the diversion was that he make child support payments. If he successfully completed his diversion, the felony charge would be dismissed. About a year after Tucker was placed on diversion the trial court issued a warrant for his arrest because Tucker was failing to pay child support. He was brought into court on that warrant, the child support issue was addressed, and the diversion continued. About a month later, a further review was held, resulting in a notation in the court record that the matter would be "redocketed upon new motion." Nothing else transpired in the case until five days after the diversion period expired, when the case was on the calendar for "final disposition." At that hearing, noting that Tucker had never made his child support payments, the court ordered the diversion "voided" and sentenced Tucker to two years in prison. Tucker appealed the decision to void his diversion, arguing that once his diversion period ended it was too late to consider revoking it.

The appeals court stated that this case "can be resolved merely by noting that the Commonwealth had the means readily at hand to seek to have Tucker's pretrial diversion revoked if it believed his failure to pay child support…justified such action." Those means, according to the court, are spelled out clearly in Kentucky law (KRS 533.256(1)). "It is not illogical that the General Assembly opted to provide a specific method by which the Commonwealth can seek to have Class D Felony Diversion voided. Nor is it illogical that any such effort by the Commonwealth be required to be made before expiration of the pretrial diversion period. We so hold, and thus conclude that the revocation of Tucker's pretrial diversion was error." The court reversed the judgment and sentence of the trial court and remanded the case to the trial court with instructions to dismiss the indictment.

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