SUPREME COURT NO. 94556-0
COURT OF APPEALS NO. 47251-1-II

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Petitioner,

v.

BRIAN M. BASSETT,

Respondent.

STATE'S ANSWER TO BRIEFS OF AMICI CURIAE

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A. INTRODUCTION

Several organizations have submitted amicus curiae briefs in support of Bassett, who challenges the life without parole (LWOP) sentence imposed at his resentencing for three aggravated murders Bassett committed as a juvenile. The State maintains that the sentence, and the statute that permits it, is consistent with the state constitution. The State offers the following response to the arguments of amici.

B. ARGUMENT IN RESPONSE TO AMICI JUVENILE LAW CENTER ET AL.

1. JUVENILE LAW CENTER OVERSIMPLIFIES DEVELOPMENTAL AND NEUROSCIENCE RESEARCH AND OVERSTATES ITS CONCLUSIONS.

a. Amici Are Considerably More Certain Of What The Science Proves Than Scientists Are.

Amici curiae Juvenile Law Center, American Civil Liberties Union of Washington, Campaign for Fair Sentencing of Youth, Council of Juvenile Correctional Administrators, and Mothers Against Murderers Association (collectively, "JLC") suggest that developmental and neuroscientific research proves that juveniles are categorically less culpable for criminal conduct because their brains are structurally and functionally less developed than those of adults, and these brain differences simultaneously render adolescents more likely to make bad decisions, less susceptible to deterrence, and, eventually, more likely to

desist from antisocial behavior. Although amici cite a number of scholarly articles in support of this blanket proposition, they both overstate the research and fail to convey its significant limitations, which render the science an unsuitable vehicle for driving sentencing policy by appellate courts.[1]

Amici's discussion of juvenile brain research begins with the assertion that "an increasingly settled body of both developmental and neuroscientific research confirm[s] that the structural, developmental, and functional differences in adolescent brains impact adolescent behavior." JLC Br. at 10. Amici assert that these differences impair adolescents' abilities to appreciate risks and consequences and to make reasoned, independent decisions. JLC Br. at 11. Amici state that "[b]ecause of the under-development of the pre-frontal cortex, adolescents have difficulty in thinking realistically about events that may occur in the future" and are therefore "both less likely to think about potential long-term consequences, and more likely to assign less weight to those that they have identified[.]" JLC Br. at 12. Despite the certainty with which amici describe the link between juvenile brain development and juvenile behavior, scientists urge caution in making such connections.

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[1] As argued in the State's Revised Supplemental Brief, the setting of juvenile sentencing policy is a legislative function, not a judicial one. See State's Suppl. Br. at 18-20.

For example, amici rely heavily on various publications authored or coauthored by Professor Laurence Steinberg. See JLC Br. at iii-iv. But Professor Steinberg does not claim that juvenile brain science "confirms" that differences in adolescent brains impact adolescent behavior, as amici asserts. Rather, Professor Steinberg describes the link between adolescent brain differences and adolescent behavior as "sensible conjecture," noting that "few studies have linked changes in brain structure or function between adolescence and adulthood to changes in the legally relevant behaviours, especially as they play out in the real world." Laurence Steinberg, *The Influence of Neuroscience on US Supreme Court Decisions About Adolescent's Criminal Culpability,* 14 Nature Neuroscience 513, 517-18 (2013). In another publication, Professor Steinberg argues that assertions like those made in amici's brief "must be tempered ... in view of the absence of direct evidence in humans that link the biology with the behavior. ... [T]he fact that particular sets of neurobiological and behavioral changes occur concurrently in development can only be taken as a suggestion of a connection between them." Laurence Steinberg, *A Social Neuroscience Perspective on Adolescent Risk-Taking*, 28 Developmental Review 78, 92 (2008). See also Laurence Steinberg, *The Science of Adolescent Brain Development and Its Implications for Adolescent Rights and Responsibilities*, Human Rights and Adolescence,

59, 67 (J. Bhabha ed., 2014) ("Although there is a good degree of consensus about many of the ways in which the brain structure and function change during adolescence, it is less clear just how informative this work is about adolescent behavior.").

In addition to the absence of evidence directly linking juvenile brain structure and function to adolescent behavior, some research undermines amici's conclusion that teen brains are less able to appreciate risk and make reasoned decisions. For example, Professor Steinberg has noted that "adolescents were shown to be no worse than adults at perceiving risk or estimating their vulnerability to it" and that "there appear to be few, if any, age differences in individuals' evaluations of the risks inherent in a wide range of dangerous behaviors ... or in their judgments about the seriousness of the consequences that might result from risky behavior." Dustin Albert & Laurence Steinberg, *Judgment and Decision Making in Adolescence,* 21 J. of Res. On Adolescence 211, 213 (2011). See also Mariam Arain, et al., *Maturation of the Adolescent Brain*, 9 Neuropsychiatric Disease & Treatment 449, 455 (2013) ("By the age of 15 years, there is little difference in adolescents' and adults' decision-making patterns pertaining to hypothetical situations. Teens were found to be capable of reasoning about the possible harm or benefits of different courses of action," yet "still engaged in dangerous behaviors"

for reasons that have yet to be researched). Further, "other research suggests that most adolescents achieve intellectual and cognitive maturity, though not psychosocial maturity, by the mid-teenage years. There is, therefore, some law-relevant decisional maturation before eighteen, and it is not yet clear how to harmonize those findings with brain maturation." Terry Maroney, *The False Promise of Adolescent Brain Science in Juvenile Justice*, 89 Notre Dame L. Rev. 89, 153-54 (November 2009).

Despite scientists' own uncertainty about how brain development affects behavior, the impulse to use emerging research to support policies and legal outcomes deemed beneficial for adolescents is understandable. See Terry Maroney, *The Once and Future Juvenile Brain,* Choosing the Future for American Juvenile Justice (Franklin E. Zimring & David S. Tanenhaus eds., 2014) at 204 ("All of this adds up to the juvenile brain as potent rhetorical device. It's current, fresh, even cool and fun."). But as Professor Steinberg has noted, "neuroscientific evidence does not make the behavioural differences between adolescents and adults any more real. It only makes them seem more real to non-scientists who ... like most of us, are more easily impressed by science we do not understand well enough to critique[.]" Steinberg, 14 Nature Neuroscience at 517. Unfortunately, "[t]he realities of advocacy, in which nuance and complexity are difficult to convey without compromising effectiveness,

incentivize advocates to oversimplify." Maroney, *False Promise*, 89 Notre Dame L. Rev. at 160.

Amici have oversimplified the science and asserted a causal relationship between brain immaturity and adolescent behavior that the science simply does not support.

> As the scientists themselves have taken pains to point out, the current generation of studies shows only group trends. While all humans will pass through the same basic stages of structural maturation at more or less the same stages of life, the timing and manner in which they do so will vary. Further, while functional capacity will in some way track structural maturation, we do not yet have a firm grip (or anything close to it) on that relationship.

Maroney, *The Once and Future Juvenile Brain*, at 205-06 (citations omitted). This Court should resist the temptation to base conclusions on the constitutionality of duly enacted legislation on incomplete and inconclusive scientific research.

b. Neuroscience Is Not Well-Suited To Drive Sentencing Policy.

Given his reluctance to overstate the conclusions to be drawn from juvenile brain research, it is not surprising that Professor Steinberg cautions that "we should not make policy decisions on the basis of brain science alone." Steinberg, *The Science of Adolescent Brain Development and Its Implications for Adolescent Rights and Responsibilities*, Human Rights and Adolescence, at 74. Besides the uncertainty remaining in how

brain development affects adolescent behavior, intrinsic limitations of the research make it a poor framework for creating sentencing policy.

First, the juvenile brain research on which amici rely does not demonstrate that juveniles are necessarily incapable of exercising good judgment or that their failure to control antisocial impulses is necessarily excusable. "It instead implies that, compared to a similar failure in an adult, it is less blameworthy to the extent that avoidance would have required more effort, through no fault of the child's own." Maroney, *False Promise*, 89 Notre Dame L. Rev. at 150.

> Unfortunately, defenders and experts often treat the legal significance of the science as a given; indeed, they sometimes bypass the relative-deficiency point altogether and devolve into hard biological determinism. They sometimes argue, for example, that because of their immature brains, adolescents can't make good decisions under stress, control their emotions, suppress violent impulses, foresee consequences, or defy antisocial peers. ... Such assertions conflict with everyday observations (and, often, record evidence) that most teenagers make good choices most of the time and that offenders, too, make socially beneficial, self-protective, or strategic choices, sometimes within the context of the offense behavior itself.

Id. at 150-51. Here, for example, the record establishes that Bassett had repeatedly threatened to kill his mother during heated arguments over the year preceding her death. RP (Trial) 1484-87, 1575. Whether or not it was harder for him than for an adult, he was able to suppress that impulse for months, indicating that he had that capacity. When he finally took her

life, it was only after days of planning and preparation, and was followed by self-protective measures to eliminate a witness, destroy evidence, and flee. Even if adolescent brain science could show that Bassett himself was *relatively* less able to make good decisions than he will be as an adult, it does not follow that he was *incapable* of doing so.

Following the neuroscience research would lead to suspect classifications in sentencing policy. The research has not been limited to exploring differences in brains between juveniles and adults. Research indicates that brain maturation is linked to puberty and that girls enter puberty and experience early-adolescence "neural exuberance" in the frontal lobes at least a year before boys do. Maroney, *False Promise*, 89 Notre Dame L. Rev. at 157. Thus, if structural brain maturity is to be used to inform sentencing policy, "it would counsel that boys and girls become subject to juvenile-court-jurisdiction, and age out of it, at different times[.]" Id. Age of pubertal onset is also linked to race; it has been well-documented that African American girls enter puberty significantly earlier than white American girls. Id. at 158. Should sentencing guidelines reflect this difference as well? Advocates for brain-based policy will find it difficult to demonstrate why "inequality is not its logical outcome." Id. at 158.

Neuroscientific and developmental research does not tell us that adolescents are universally incapable of controlling their impulses and making good decisions. It does not tell us exactly when their brains achieve structural and functional maturation, or whether any particular person has passed that threshold. Its utility in this discussion is limited to confirming what any parent or former adolescent already knows: most teenagers are less mature than most adults.

2. NEUROSCIENTIFIC RESEARCH INDICATING JUVENILES BEHAVE MORE IMPULSIVELY DOES NOT EXPLAIN BASSETT'S CONDUCT.

Amici emphasize differences in juveniles' impulsivity and relative difficulty making good decisions under stress. JLC at 13-15. Citing research into "cold cognition" and "hot cognition," and apparently assuming that criminal conduct occurs only under conditions of "high arousal and intense emotion," JLC suggests that deterrence is not a meaningful objective in juvenile sentencing. The facts of Bassett's case do not align well with this view of juvenile offending.

Bassett did not kill his parents and young brother impulsively. He and a friend planned the murders over several days. He prepared himself by stealing a rifle days before the murder. He went to the family home to attempt the killings several times before he finally went through with it. When he did, he first made sure that his victims could not call for help by

disconnecting the phone line, and tried to limit the risk of discovery or interruption by fashioning a home-made silencer. When Bassett's little brother saw what happened, Bassett and his friend murdered the child. The two then hid the bodies, cleaned up the blood, stole items from the house, and fled the state. These facts reflect none of the distinctive attributes of youth that diminish culpability. This was not a crime of impulse. Juvenile brain science does not explain, much less excuse, Bassett's conduct.

3. THE RESENTENCING COURT DID NOT DISREGARD EVIDENCE OF POST-OFFENSE REHABILITATION.

Bassett and the various amici assert that the resentencing court simply disregarded the evidence he produced about his post-offense rehabilitation.[2] That is not so. The record shows that the resentencing court considered the evidence, but reasonably concluded that it did not compel leniency.

The resentencing court acknowledged evidence that Bassett had completed his GED and took college classes, behaved well in prison, developed woodworking skills, and got married. RP (1/30/15) at 90-92. The court explained why this evidence was not persuasive. Good behavior

[2] Notably, under the SRA, these facts, unrelated to the crime, could not support an exceptional sentence below the standard range. State v. Law, 154 Wn.2d 85, 110 P.3d 717 (2005). However, Miller v. Alabama, 567 U.S. 460, 132 S. Ct. 2455, 183 L. Ed. 2d 407 (2012), requires a sentencing court to consider *chances* of rehabilitation before imposing a life sentence on a juvenile.

in prison does not prove rehabilitation because "[t]here are consequences to not following the rules in prison," including the loss of limited privileges. RP (1/30/15) at 90-91. The court commended Bassett for pursuing education and developing woodworking skills, but considered that "less evidence of rehabilitation and more evidence that ... he is simply doing things to make his time in prison more tolerable." RP (1/30/15) at 91. Bassett's marriage to a cell mate's mother also did not persuade the court of Bassett's rehabilitation, although the court confessed, "I don't know what to make of that." Id.

Bassett's efforts at post-offense rehabilitation did not convince the resentencing court that he had been or ever would be rehabilitated such that he could safely return to the community. Bassett and amici disagree with the court's conclusion, but that does not mean that the court failed to consider the evidence.

C. THE KOREMATSU CENTER'S ARGUMENT IN FAVOR OF CATEGORICAL BAR ANALYSIS IS UNPERSUASIVE

The Fred T. Korematsu Center for Law and Equality, Columbia Legal Services, TeamChild, and Washington Defender Association (collectively, "Korematsu Center") argue that the court of appeals here properly employed a categorical bar analysis and that a Gunwall[3] analysis

[3] State v. Gunwall, 106 Wn.2d 54, 720 P.2d 808 (1986).

is not required, but nonetheless supports the conclusion that Washington's cruel punishment clause is more protective of juveniles than the Eighth Amendment. This Court should reject the unpersuasive and confusing arguments.

1. AMICI'S ARGUMENT IS INCONSISTENT WITH THIS COURT'S RECENT DECISIONS.

Korematsu Center argues that the court of appeals' decision to use a categorical bar analysis rather than the long-established Fain[4] proportionality analysis to evaluate Bassett's state constitutional claim was appropriate because "the categorical bar is here." Korematsu Center (KC) Br. at 5. For this proposition, they rely on State v. Schmeling, 191 Wn. App. 795, 799, 365 P.3d 202 (2015). Schmeling was an Eighth Amendment case that presented no state constitutional claim. Schmeling does not support Korematsu Center's suggestion that Washington courts have already embraced a categorical analysis for state cruel punishment claims. Indeed, as set forth in the State's Revised Supplemental Brief, such suggestion is clearly contrary to this Court's precedent identifying Fain as the sole applicable analysis. See State's Supp. Br. at 11-18.

Korematsu Center also argues that the failure of the Fain framework to account for the nature of the offender means that using Fain

[4] State v. Fain, 94 Wn.2d 387, 617 P.2d 720 (1980).

to consider Bassett's state constitutional claim violates the Eighth Amendment and Miller v. Alabama, 567 U.S. 460, 132 S. Ct. 2455, 138 L. Ed. 2d 407 (2012). KC Br. at 4-5. Korematsu Center offers no authority for the novel proposition that the federal constitution bars a state court from using state precedent to analyze a state constitutional claim, and Bassett makes no federal constitutional claim. The argument is not well-taken.

2. AMICI'S ARGUMENT THAT GUNWALL ANALYSIS IS UNNECESSARY IS UNPERSUASIVE.

Korematsu Center argues that it is unnecessary to perform a Gunwall analysis because Washington courts have already concluded that art. I, sec. 14 is more protective than the Eighth Amendment, citing a number of cases. KC Br. at 7. Accordingly, the Center argues, "the material inquiry is not *whether* the provision affords broader protection, but *how* the provision provides broader protection in this new context." KC Br. at 8. For this proposition, Korematsu Center relies on Blomstrom v. Tripp, 189 Wn.2d 379, 402 P.3d 831 (2017). That reliance is misplaced.

In Blomstrom, this Court noted that it is now "axiomatic" that the Washington Constitution provides more protection than the Fourth Amendment. Id. at 399. Nevertheless, the court performed a Gunwall

analysis "to determine *whether*, in a given situation, the Washington State Constitution should be considered as extending broader rights." Id. at 400 (emphasis added). Thus, rather than demonstrating that no Gunwall analysis is necessary, Blomstrom supports the State's position that Division Two erred by failing to perform such an analysis in this case.

3. AMICI'S GUNWALL ANALYSIS IS FLAWED.

The State provided a Gunwall analysis in its revised supplemental brief. See State's Supp. Br. at 7-10. There is no need to repeat it here. Rather, the State will explain several flaws in Korematsu Center's reasoning.

Text/Textual Differences. Korematsu Center cites State v. Dodd, 120 Wn.2d 1, 838 P.2d 86 (1992), as authority for the proposition that Washington's cruel punishment clause is broader than the Eighth Amendment, but urges this Court to ignore the rest of the Dodd court's analysis despite it being "one of the few cases to analyze textual factors in the article I, section 14 context[.]" KC Br. at 9-10. While the Dodd court did note that the text of the Washington provision "on its face, may offer greater protection," it also considered historical records and concluded that "it is not clear that the parallel provisions are significantly different." 120 Wn.2d at 21. Korematsu Center's argument that the State "erroneously" relies on Dodd's conclusion that the State constitution affords no greater

protection than the Eighth Amendment is belied by this Court's reliance on Dodd for this very proposition in 2014. See In re Cross, 180 Wn.2d 664, 731, 327 P.3d 660 (2014).

Constitutional and Common Law History. Korematsu Center's argument with respect to constitutional and common law history is puzzling because it addresses neither of those topics. Instead, it asserts that Division Two "carefully analyzed article I, section 14 common law" in the instant case, citing one page of the Bassett opinion. KC Br. at 10-11 (citing State v. Bassett, 198 Wn. App. 714, 738, 394 P.3d 430 (2017)). No such analysis appears on that page or elsewhere in the Bassett opinion, likely because the Bassett court neglected to perform a Gunwall analysis altogether. Beyond that, Korematsu Center's argument consists primarily of a block quote from the Iowa case on which Division Two relied. Unsurprisingly, that source does not discuss Washington legal history.

Preexisting state law. Korematsu Center's argument as to preexisting state law is unhelpful because it discusses only cases decided *after* our legislature enacted the 2014 amendments at issue in this case. KC Br. at 13-15.

In sum, Korematsu Center's arguments in Bassett's favor are passionate, but miss the mark in significant ways. This Court should not be persuaded.

D. BASSETT'S SENTENCE IS NOT UNCONSTITUTIONALLY CRUEL UNDER FAIN

The State anticipates that Washington Association of Criminal Defense Lawyers (WACDL) will argue that a Fain analysis demonstrates that juvenile life without parole (JLWOP) sentences are unconstitutionally cruel under the state constitution.[5] The argument should be rejected because application of the four Fain factors demonstrates that Bassett's life sentence does not violate art. I, § 14 of the Washington State Constitution.

Nature of the offense. The offense at issue is aggravated first degree murder, the most serious offense under Washington law. Here there was not only one aggravated murder, but three. The three murders were not spontaneous, but planned in advance and attempted on several other occasions. The murders were not motivated by parental abuse or neglect, but by Bassett's rage that his parents would not allow him to do whatever he wanted at age 16. See, e.g., RP (trial) 2110-11, 2126. The horrific drowning of five-year-old Austin after he became covered in the blood of his fatally wounded mother and father was a callous effort to avoid the consequences of the other killings. The nature of this crime plainly supports the severest sentence that can be imposed on a juvenile.

[5] This Court rejected WACDL's first amicus brief as noncompliant with court rules, but invited WACDL to resubmit a corrected brief.

Legislative purpose behind the statute. The legislature amended RCW 10.95.030 specifically to comply with Miller. The final bill report for the legislation discussed Miller and the legislature's intent to comply with its mandate:

> The court held when a youth is convicted of murder that occurred before age 18, the sentencing judge must focus directly on the youth and assess the specific age of the individual, the youth's childhood, and the youth's life experience; weigh the degree of responsibility the youth was capable of exercising; and assess the youth's chances of becoming rehabilitated. The judge can only impose a sentence of life without parole if the judge concludes the sentence "proportionally" punishes the youth, given all of the factors that mitigate the youth's guilt. The court reasoned that while it is not foreclosing the judge's ability to sentence a youth to life without parole, appropriate occasions for sentencing juveniles to this harshest penalty will be uncommon.

Final Bill Report 2SSB 5064. Thus, the purpose of the statute is to ensure that sentencing courts properly consider a juvenile's youth and attendant attributes, and impose LWOP only in the uncommon situations where it is truly merited.

Bassett's sentence comports with this purpose because the resentencing court expressly considered the mitigating characteristics of youth and concluded that these features did not significantly factor into or mitigate Bassett's culpability before imposing sentence.

Punishment defendant would receive in other jurisdictions. Despite some states' choices to abandon or limit LWOP sentences, the majority of states continue to allow LWOP sentences for some juvenile murderers. Bassett, 198 Wn. App. at 740. See also Kallee Spooner and Michael Vaughn, Sentencing Juvenile Homicide Offenders: A 50-State Survey, 5 Va. J. Crim. L. 130, at 151 (Summer 2017) ("LWOP is the maximum recommended sentence in twenty-nine states and the federal government, meaning a majority of jurisdictions allow for juvenile homicide offenders to be sentenced to LWOP.").

Punishments meted out for other offenses in the same jurisdiction. Life without parole is a severe sentence available only in cases of aggravated murder or for adult offenders who are sentenced under the Persistent Offenders Accountability Act. Washington also subjects certain sex offenders to indeterminate sentences that can equal life in prison. Thus, life sentences are reserved for the worst offenders and the worst crimes. Bassett murdered three people, including a small child. An LWOP sentence for this crime is consistent with Washington's sentencing scheme. See State v. Ramos, 187 Wn.2d 420, 429, 387 P.3d 650 (2017)

(approving de facto life sentence for 14-year-old convicted of murdering four people including children).

The Fain analysis demonstrates that neither Bassett's sentence, nor the legislation that makes it possible, violate Washington's constitutional ban on cruel punishment.

E. BASSETT'S CASE PRESENTS NO EIGHTH AMENDMENT QUESTION

The Supreme Court was asked to invalidate LWOP sentences for all juveniles and expressly declined. Miller v. Alabama, 567 U.S. 460, 132 S. Ct. 2455, 2460, 183 L. Ed. 2d 407 (2012). In any event, Bassett has not argued that his sentence or the statute that permits it violates the Eighth Amendment. Any further limitation on LWOP sentences must be based on the state constitution. To the extent that any amici argue that this Court should overturn Bassett's sentence and hold the Miller-fix legislation unconstitutional under the Eighth Amendment, the argument is not well taken. See Citizens for Responsible Wildlife Mgt. v. State, 148 Wn.2d 622, 631, 71 P.3d 644 (2003) ("[W]e will not address arguments raised only by amicus").

F. CONCLUSION

For the reasons expressed above and in the State's Revised Supplemental Brief, the State respectfully requests this Court reject the arguments of amici curiae.

DATED this 5th day of February, 2018.

Respectfully submitted,

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