

SUPREME COURT OF THE STATE OF WASHINGTON

State v. Buck

No. 104170-5 (Wash. May 14, 2026) · No. 104170-5 · Decided May 14, 2026

SUMMARY

The Washington Supreme Court holds that RCW 9A.36.150(1)(b), which criminalizes interfering with the reporting of domestic violence, defines a single crime rather than an alternative means crime. The court affirms Division Three of the Court of Appeals and overturns Division One's contrary holding in State v. Nonog.

CASE DETAILS

COURT	Supreme Court of the State of Washington
WRITING FOR THE COURT	Madsen, J.P.T.; Melody, J.
JURISDICTION	Supreme Court of the State of Washington
DECIDED	May 14, 2026
DOCKET	104170-5
DISPOSITION	affirmed
PROCEDURAL POSTURE	Leif Buck sought review of Division Three of the Washington Court of Appeals' decision affirming his conviction for interfering with the reporting of domestic violence. The Washington Supreme Court granted review to resolve a conflict between appellate divisions concerning whether the offense is an alternative means crime.
STANDARD OF REVIEW	Whether a statutory offense constitutes an alternative means crime is a question of statutory interpretation reviewed de novo.
PRECEDENTIAL VALUE	Published, en banc Washington Supreme Court opinion; precedential.
PARTIES	Leif Buck v. State of Washington

TOPICS

- statutory interpretation
- criminal procedure
- jury selection
- constitutional law
- appellate procedure

PRACTICE AREAS

- criminal law
- constitutional law
- appellate law

QUESTIONS PRESENTED

1. Whether RCW 9A.36.150(1)(b), which criminalizes preventing or attempting to prevent a victim or witness from calling 911, obtaining medical assistance, or making a report to law enforcement, defines one crime or three alternative means of committing the crime.
2. Whether Buck's conviction violated the Washington Constitution's right to a unanimous jury verdict.

HOLDINGS

1. RCW 9A.36.150(1)(b) defines a single crime of interfering with the reporting of domestic violence, not three alternative means of committing three separate crimes.
2. Buck's conviction did not violate the Washington Constitution's jury-unanimity requirement because the charged offense is a single-means crime.

KEY QUOTATIONS

“We hold that RCW 9A.36.150(1)(b) defines a single crime of interfering with reporting domestic violence and not three alternative means of committing three separate crimes.” (at 9)

“The only proscribed conduct in this case is interfering with reporting domestic violence.” (at 8)

FACTUAL BACKGROUND

Leif Buck and A.H., who shared two children, lived separately. During a discussion at Buck's residence, Buck physically restrained and dragged A.H., took her cell phone when she said she would call the sheriff, and thereby prevented her from immediately calling 911. A.H. later drove to the sheriff's office to report the incident and sought emergency medical treatment for bruises and swelling.

PROCEDURAL HISTORY

Buck was convicted in the trial court of interfering with the reporting of domestic violence and failure to register as a sex offender. On appeal, he argued that the interference conviction violated his right to a unanimous jury verdict because the State had not presented evidence supporting every alleged alternative means. Division Three held that the offense was not an alternative means crime and affirmed. The Washington Supreme Court granted review and affirmed Division Three.

DISPOSITION

affirmed

CASES CITED

- State v. Buck, 34 Wn. App. 2d 188, 191-94, 567 P.3d 54 (2025)
- State v. Nonog, 145 Wn. App. 802, 811-13, 187 P.3d 335 (2008)
- State v. Barboza-Cortes, 194 Wn.2d 639, 643, 650, 451 P.3d 707 (2019)
- State v. Mayorga DeSantiago, 149 Wn.2d 402, 417, 68 P.3d 1065 (2003)

- State v. Smith, 159 Wn.2d 778, 784-86, 154 P.3d 873 (2007)
- State v. Sandholm, 184 Wn.2d 726, 732-35, 364 P.3d 87 (2015)
- State v. Owens, 180 Wn.2d 90, 95-99, 323 P.3d 1030 (2014)
- State v. Shoop, 1 Wn.3d 532, 538-39, 543, 528 P.3d 363 (2023)
- State v. Peterson, 168 Wn.2d 763, 770, 230 P.3d 588 (2010)
- State v. Arndt, 87 Wn.2d 374, 379, 553 P.2d 1328 (1976)
- State v. Woodlyn, 188 Wn.2d 157, 163, 392 P.3d 1062 (2017)
- State v. Fleming, 140 Wn. App. 132, 135-37, 170 P.3d 50 (2007)
- State v. Lucas-Vicente, 22 Wn. App. 2d 212, 220-21, 510 P.3d 1006 (2022)
- State v. Holcomb, No. 75245-6-I, slip op. at 16 n.11 (Wash. Ct. App. Aug. 7, 2017) (unpublished)
- Griffin v. United States, 502 U.S. 46, 56, 112 S. Ct. 466, 116 L. Ed. 2d 371 (1991)
- State v. Whitney, 108 Wn.2d 506, 511, 739 P.2d 1150 (1987)
- Richardson v. United States, 526 U.S. 813, 819, 119 S. Ct. 1707, 143 L. Ed. 2d 985 (1999)