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Court of Appeals
Division III
State of Washington
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SUPREME COURT
STATE OF WASHINGTON
3/16/2022
BY ERIN L. LENNON
CLERK

SUPREME COURT NO. 100751-5

NO. 37911-6-III

SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

TOMMY-JOEL QUIROZ,

Petitioner.

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KITTITAS COUNTY

The Honorable Scott R. Sparks, Judge

PETITION FOR REVIEW

CHRISTOPHER H. GIBSON
Attorney for Petitioner

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RULES, STATUTES AND OTHER AUTHORITIES

INTRODUCTION

Petitioner Tommy-Joel P. Quiroz was charged and convicted in Kittitas County Superior Court of attempted second degree child rape and communicating with a minor for immoral purposes (CMIP). The charges arose out of a December 2018 sting operation in Ellensburg known as "Net Nanny," in which law enforcement officers pose as children in online chat rooms pretending to seek sex with adults.

A. IDENTITY OF PETITIONER

Petitioner Tommy Joel P. Quiroz, appellant below, asks this Court to review the decision of the Court of Appeals referenced below.

B. COURT OF APPEALS DECISION

Quiroz seeks review of the Court of Appeals decision in State v. Quiroz, No. 37911-6-III (Slip Op. filed January 25, 2022). A copy of the slip opinion and the subsequent ruling (entered March 3, 2022) denying Quiroz's motion to reconsider are attached as Appendices A & B, respectively.

C. REASON WHY REVIEW SHOULD BE GRANTED

Review is warranted under RAP 13.4(b) (1) because the decision conflicts with this Court's decisions in State v. Hickman, 135 Wn.2d 97, 954 P.2d 900 (1998) and State v. Dent, 123 Wash.2d 467, 869 P.2d 392 (1994), which hold jury instructions not objected to ***before*** they are read to the jury become the law of the case.

D. ISSUES PRESENTED

The prosecution's proposed jury instructions were provided to the jury without defense objection. The to-convict instruction, Instruction 8, proposed by the prosecution and read to the jurors by the trial court stated the prosecution had to prove Quiroz attempted to rape a child on or about "December 17, **2020**," a date that had not yet occurred.

1. Did the trial court err in granting the prosecution's motion to amend Instruction 8 midway into defense counsel's closing argument over defense objection that Instruction 8 was the law of the case?

2. If Instruction 8 became the law of the case after the instructions were read to the jury, was the evidence necessarily insufficient to convict Quiroz of attempted second degree child rape because there was no evidence he took a substantial step towards raping a child on or about December 17, ***2020*** because that date had not yet occurred?

E. STATEMENT OF THE CASE

1. Procedural Facts

On December 18, 2018, the Kittitas County Prosecutor charged appellant Tommy-Joel Quiroz with attempted second degree rape of child and CMIP. CP 1; RCW 9A.44.076; RCW 9A.28.020; RCW 9.68A.090(2). The prosecution alleged that on December 17, 2018, Quiroz communicated electronically with a person he believed to be a minor for immoral purposes (CMIP), and then took a substantial step towards having sexual intercourse with a person older than twelve but younger than fourteen and not married to the defendant (attempted rape). CP 1.

A trial was held September 1-3, 2020, before the Honorable Judge Scott R. Sparks. RP[1] 5-508. A jury found Quiroz guilty as charged. CP 39-40; RP 499-502.

Quiroz was sentenced on December 7, 2020, to an indeterminate minimum term sentence of 80 months for the attempted rape and a concurrent twelve months for the CMIP. CP 61-76; RP 523.

Quiroz appealed, arguing the trial court erred by modifying over defense objection the to-convict instruction for the attempted second degree child rape charge midway into the defense closing argument. CP 79; Brief of Appellant (BOA); Reply Brief of Appellant (RBOA). The Court of Appeals rejected Quiroz's on the basis that the erroneous instruction was a mere "scrivener's error" that was properly "corrected before the jury began deliberation." Appendix A at 6.

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[1] There are two consecutively paginated volumes of verbatim report of proceedings reference collectively herein as "RP" followed by the appropriate page citation.

2. Substantive Facts

(a) Facts Leading to the Arrest & Interview

In 2015, members of the Missing and Exploited Children Task Force, "MEC-TEF," developed a "proactive policing" sting operation now commonly referred to as "Net Nanny," which involves trying to identify adults using the internet to seek out sex with children and arrest them before they succeed. RP 138-42. The operation conducted in December 2018 in Ellensburg involved posting a fake profile on a dating website of girl named "Amanda" seeking sex. The profile stated she was 40 or 42 years old, but the pictures provided in the profile were of a female Washington State Patrol (WSP) trooper in her early 20s made to look even younger by applying "Snapchat" filters. RP 174-76, 197; Exs. 39 & 40.

On December 16, 2018, Quiroz contacted the "Amanda" profile and began conversing through messages on the dating platform, which was documented by the MEC-TEF team. RP 209; Ex. 2. In that exchange of messages, Quiroz states he is 32

years old, after which "Amanda" claims she is only 13 years old, to which Quiroz expressed surprise. RP 218-19. The discussion eventually turned to them getting together at "Amanda's" home while her mother is working, but Quiroz was unable to arrange transportation from his home in Yakima to Ellensburg, so they agree to try again the following day, and to switch the conversation to cell phone text messages. Ex. 2.

The following morning "Amanda" texted Quiroz at about 9:30 a.m. the next morning and their conversation continued thereafter about Quiroz coming to her house so they could have sex. Ex. 3. The record of those text messages show Quiroz showed up at the undercover residence at about 6 p.m. Ex. 3 at 13. The female trooper used for the profile picture was there to let Quiroz into the home, after which he was immediately arrested. RP 177.

Quiroz agreed to a recorded interview after his arrest in which he admits going to the undercover residence with the

intent of engaging in sex with a 13 year old girl. RP 355-99; Ex. 29.

(b) Facts regarding Jury Instructions & Closing

The defense case consisted of Quiroz's testimony, in which he claimed he believed "Amanda" was in her 20s, not 13, and that he only said in his post-arrest interview that he went intending to have sex with a 13 year old girl because he felt pressured to tell law enforcement what they wanted to hear. RP 450-61. A jury instruction conference was held thereafter. RP 463-66.

Defense counsel did not object to any of the prosecutor's proposed instructions, other than noting the "defendant not compelled to testify" instruction should be withdrawn. RP 463. Thereafter the trial court read the instructions verbatim to the jury. RP 467-78.

Following reading of the instructions, the prosecutor closing remarks turned immediately to what he believed the State

had to have proved in order for the jury to convict Quiroz of attempted second degree child rape:

> So the three elements. First, on or about December 17, -- 2018 [sic] the defendant did an act that was a substantial step towards the commission of rape – child in the second degree. And there are several instructions that are illustrative on this point that you have in your packet (inaudible) read to you.
> . . .

RP 479.

Similarly, defense counsel's closing remarks quickly turned to what the prosecution had to prove to convict Quiroz of attempted second degree child rape:

> The state has the burden. The judge is instructing you on – the law. This is what is requires in order for you to convict him.
>
> Well, right off the bat, on Instruction No. 8, to convict the defendant of a crime of attempted – rape of a child in the second degree, that on or about December 17, 2020 - -
>
> [PROSECUTOR]: Judge, I'd object. It's obviously a typo in the instruction.
>
> [DEFENSE COUNSEL]: Judge, these are the instructions. I get to argue from them. It is the law of the case.
>
> THE COURT: Are you moving to amend, counsel?

[PROSECUTOR]: Yes, sir. I - - I think it's (inaudible) Mr. [defense counsel] (inaudible).
THE COURT: Which number?
[PROSECUTOR]: Eight.
THE COURT: Yeah. That should read – 2018.
[PROSECUTOR]: Thank you, Judge.

RP 491.

Following the prosecutor's rebuttal argument, defense counsel reiterated his objection to amending Instruction 8. RP 497. The trial court responded, "Sure. And you didn't bring it up earlier, which is your right, and – I didn't notice until your argument. So, -- I should have caught it earlier as well." Id.

F. ARGUMENT

THIS COURT SHOULD GRANT REVIEW BECAUSE THE COURT OF APPEALS DECISION CONFLICTS WITH THIS COURT'S DECISION IN HICKMAN AND DENT.

This Court has made clear, "jury instructions not objected to become the law of the case." State v. Hickman, 135 Wn.2d 97, 102, 954 P.2d 900 (1998). It also made clear that a timely objection to an instruction is one made ***before*** the instructions are

read to the jury. Id. at 105 (citing State v. Dent, 123 Wash.2d 467, 479, 869 P.2d 392 (1994)). In Dent, this Court held:

> It is elementary that timely exceptions, *before* the reading of the instructions to the jury, are necessary to permit the court to correct any error which may exist so that the jury is instructed correctly.

123 Wn.2d at 479 (italics in original).

Here, the prosecution did not object to Instruction 8 before the instructions were read to the jury, did not object before his initial closing remarks, and did not object until after defense counsel began closing argument. RP 467-91. Under Hickman and Dent, the prosecutor's objection was not timely. The Court of Appeals conclusion to the contrary is in direct conflict with Hickman and Dent.

When analyzed under Hickman and Dent, Instruction 8, as proposed by the prosecutor and not objected to by Quiroz, became the law of the case once the trial completed reading the instructions to the jury without objection. Because Instruction 8 is the law of the case, Quiroz's argument that there was insufficient evidence to

convict him of attempted child rape necessarily succeeds because there was no evidence presented to support finding he made such an attempt "on or about December 17, 2020" for the simple reason that that date had yet to occur. See BOA at 7-11.

The Court of Appeals' attempt to equate the instructional error in Quiroz's trial to that in State v. Garcia, 177 Wn. App. 769, 313 P.3d 422 (2013), review denied, 179 Wn.2d 1026, 320 P.3d 718 (2014), as a mere "nonprejudicial mistake in the to-convict jury instruction" for which the trial court had discretion to correct, is misplaced. Appendix A at 5. As explained in more detail in Quiroz's reply brief in the Court of Appeals:

> Garcia is readily distinguishable. Unlike in Garcia, here defense counsel was aware of the original wording of the to-convict instruction for the attempted rape charge and specifically relied on it to argue the prosecution had failed to meet its burden to prove every element listed in the instruction beyond a reasonable doubt. RP 491. Unlike Garcia, the issue here is not about a mere trial irregularity upon which everyone agreed had occurred, but instead whether Quiroz was legally entitled to rely upon a to-convict instruction proposed by the prosecution, not objected to by either party and read to the jury before closing argument in defending himself against the charge.

> Moreover, unlike in Garcia, Quiroz did not agree to change the instruction, and instead correctly noted that unobjected to jury instructions given to the jury become the "law of the case." RP 491; State v. Dreewes, 192 Wn.2d 812, 821, 432 P.3d 795, 800 (2019); State v. Johnson, 188 Wn.2d 742, 762, 399 P.3d 507 (2017); State v. Hickman, 135 Wn.2d 97, 102, 954 P.2d 900 (1998).

RBOA at 3-4.

G. CONCLUSION

For the reasons stated herein, and as argued in Quiroz's opening and reply briefs, this Court should grant review of the Court of Appeals decision in Quiroz under RAP 13.4(b)(1) because it conflicts with Hickman and Dent, reverse that decision, reverse Quiroz's conviction for attempted child rape, dismiss that charge with prejudice and remand for resentencing on the remaining conviction.

I certify that this document was prepared using word processing software and contains 2015 words excluding those portions exempt under RAP 18.17.

DATED this 16th day of March, 2022.

Respectfully submitted,

NIELSEN KOCH & GRANNIS, PLLC

CHRISTOPHER H. GIBSON
WSBA No. 25097

Attorneys for Petitioner

Appendix A

Tristen L. Worthen
Clerk/Administrator

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CASE # 379116
State of Washington v. Tommy-Joel P. Quiroz
KITTITAS COUNTY SUPERIOR COURT No. 1810040419

Dear Counsel:

Enclosed please find a copy of the opinion filed by the Court today.

A party need not file a motion for reconsideration as a prerequisite to discretionary review by the Supreme Court. RAP 13.3(b); 13.4(a). If a motion for reconsideration is filed, it should state with particularity the points of law or fact which the moving party contends the court has overlooked or misapprehended, together with a brief argument on the points raised. RAP 12.4(c). Motions for reconsideration which merely reargue the case should not be filed.

Motions for reconsideration, if any, must be filed within twenty (20) days after the filing of the opinion. Please file the motion electronically through the court's e-filing portal or if in paper format, only the original motion need be filed. If no motion for reconsideration is filed, any petition for review to the Supreme Court must be filed in this court within thirty (30) days after the filing of this opinion (may be filed by electronic facsimile transmission). The motion for reconsideration and petition for review must be <u>received</u> (not mailed) on or before the dates they are due. RAP 18.5(c).

Sincerely,

Tristen L. Worthen
Clerk/Administrator

TLW:ko
Attach.
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c: Tommy-Joel P Quiroz
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FILED
JANUARY 25, 2022
In the Office of the Clerk of Court
WA State Court of Appeals, Division III

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION THREE

STATE OF WASHINGTON, Respondent, v. TOMMY JOEL P QUIROZ, Appellant.	)	No. 37911-6-III UNPUBLISHED OPINION

STAAB, J. — A jury found Tommy Quiroz guilty of attempted second degree child rape and communicating with a minor for immoral purposes. On appeal, Quiroz argues that the trial court erred by changing the incident date in the to-convict jury instruction during his attorney's closing argument. He contends that the alleged date of the incident became the law of the case once the court accepted the instructions. He also argues that changing the date allowed the State to introduce a new theory of culpability during closing arguments. We disagree and affirm Quiroz's convictions.

BACKGROUND

In December 2018, the Washington State Patrol conducted what is commonly referred to as a "Net Nanny" operation in Kittitas County. The operation seeks to identify and arrest those individuals who respond to offers to engage in sex with children and take one or more substantial steps to do so. Quiroz was one of the individuals apprehended in the December 2018 Net Nanny operation in Ellensburg. He was charged by information with attempted rape of a child in the second degree, and with communicating with a minor for immoral purposes; both crimes occurring on or about December 17, 2018.

Quiroz's three-day trial commenced on September 1, 2020. Throughout the trial, the jury was informed that each crime had occurred on or about December 7, 2018. In its opening statement, the State told the jury that Mr. Quiroz was charged with crimes that occurred in December 2018. In the course of testimony, every witness, including Quiroz, referenced or acknowledged December 2018 as the timeframe of the events for which they were there testifying. The jury also heard Quiroz's post-arrest interview with law enforcement. At the beginning of the recording, the officer conducting the interview stated that the interview was occurring on December 17, 2018, beginning at 1833 hours. Following the taped interview, Quiroz provided an apology letter acknowledging what he had done. That letter was signed and dated by Quiroz as "12/17/2018." Report of Proceedings (RP) at 402.

Despite the evidence produced at trial, the State's to-convict jury instruction for the attempted rape charge that was read to the jury indicated that the incident date was December 17, 2020. Clerk's Papers (CP) at 98; RP at 474. Defense counsel did not object to any of the State's proposed instructions, other than noting the "defendant not compelled to testify" instruction should be withdrawn. RP at 463. The trial court read the instructions verbatim to the jury. RP at 467-78. During closing arguments, defense counsel focused on the to-convict jury instruction:

> [DEFENSE COUNSEL]: The state has the burden. The judge is instructing you on—the law. This is what it requires in order for you to convict him.
>
> Well, right off the bat, on Instruction No. 8, to convict the defendant of a crime of attempted—rape of a child in the second degree, that on or about December 17, 2020 —
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> [PROSECUTOR]: Judge, I'd object. It's obviously a typo in the instruction.
>
> [DEFENSE COUNSEL]: Judge, these are the instructions. I get to argue from them. It is the law of the case.
>
> THE COURT: Are you moving to have that amended, counsel?
>
> [PROSECUTOR]: Yes, sir. I — I think it's (inaudible)
>
> THE COURT: Which number?
>
> [PROSECUTOR]: Eight.
>
> THE COURT: Yeah. That should read — 2018.
>
> [PROSECUTOR]: Thank you, Judge.

RP at 491. Following the State's rebuttal argument, defense counsel objected to amending Instruction No. 8. RP at 497. The trial court responded, "Sure. And you didn't bring it up earlier, which is your right, and—I didn't notice until your argument. So, —I should have caught it earlier as well." *Id.* Neither party objected to Instruction No. 8 as proposed by the State before it was read to the jury. CP at 97. Before sending the instructions back with the jury, the court amended the instruction by changing the date in the first element to "December 17, 2018." CP at 26; RP at 491-92.

ANALYSIS

A. JURY INSTRUCTIONS

On appeal, Quiroz argues that when the trial court accepts the jury instructions without objection by either party, the instructions become the law of the case. The State must then prove the elements as set forth in the instructions. He contends that the trial court in this case erred by changing the date of the to-convict instruction at the start of defense counsel's closing arguments. He also suggests that changing the alleged date of the incident during closing arguments allowed the State to introduce a new theory of the culpability that undermined defense counsel's "bulletproof" argument.

Under the law of the case doctrine, unchallenged jury instructions become the law of the case. *State v. Hickman*, 135 Wn.2d 97, 101-02, 954 P.2d 900 (1998). "In criminal cases, the State assumes the burden of proving otherwise unnecessary elements of the

offense when such added elements are included without objection in the 'to-convict' instruction." *Id.* (citing *State v. Lee*, 128 Wn.2d 151, 159, 904 P.2d 1143 (1995)).

Parallel to the law of the case doctrine is the discretion trial courts are afforded to correct nonprejudicial mistakes in the to-convict jury instruction. *See State v. Garcia*, 177 Wn. App. 769, 313 P.3d 422 (2013). In *Garcia*, the to-convict jury instruction read "first degree robbery" instead of "serious offense," as the parties had earlier agreed. *Id.* at 772-73. The trial court corrected the instruction after closing arguments and denied defense counsel's motion for a mistrial. *Id.* at 774-75. Division Two affirmed, noting that "the jury's temporary exposure to the improper instruction was not such a serious trial irregularity that it could not be cured by an instruction to disregard." *Id.* at 772.

In this case, Quiroz argues that the cutoff point for objecting to an incorrect instruction is before closing arguments. He does not cite any case law to support this temporal deadline. In *State v. Hobbs*, 71 Wn. App. 419, 424, 859 P.2d 73 (1993), the charging information and the to-convict instruction included an unnecessary element of venue. Defense counsel recognized the issue during trial and structured her questions accordingly. In closing, defense counsel pointed out that the State had failed to prove the crimes were committed in King County. After the jury began deliberating, the court allowed the State to amend the information and the to-convict jury instruction. Division One held that amending the to-convict jury instruction after closing arguments and during deliberations prevented counsel from rethinking her cross-examination strategy. *Id.* at

425. Nonetheless, Division One correctly rejected the defendant's invitation to find that the erroneous instruction constituted the law of the case once the jury began deliberating. Instead, the court reversed the conviction without prejudice and remanded for a new trial. *Id.*

In this case, the trial court did not abuse its discretion. The erroneous date in the to-convict instruction was a scrivener's error, not a misunderstanding of the law. The corrected instruction conformed to the information and the evidence produced at trial. The instruction was corrected before the jury began deliberating. The amendment did not add new law or a new theory to the case.

B. STATEMENT OF ADDITIONAL GROUNDS

In his statement of additional grounds, Quiroz alleges that the court erred in allowing the State to replace the testimony of retired Detective Sergeant Carlos Rodrigues with that of Detective Sergeant Dan McDonald. This replacement took place immediately prior to the start of the trial. Quiroz further alleges that the State committed a *Brady*[1] violation in denying Quiroz the opportunity to cross-examine Detective Sergeant Rodrigues. To support his arguments, Quiroz submits information in his declaration outside the record on appeal. Because this is a direct appeal, we will not consider evidence outside the record. *State v. McFarland*, 127 Wn.2d 322, 335, 899 P.2d

[1] *Brady v. Maryland*, 373 U.S. 83, 83 S. Ct. 1194, 10 L. Ed. 2d 215 (1963).

1251 (1995). Quiroz can raise these issues in a personal restraint petition, where he can supplement the record to support his claims. *Id.* *See also* RAP 16.4.

Affirmed.

A majority of the panel has determined this opinion will not be printed in the Washington Appellate Reports, but it will be filed for public record pursuant to RCW 2.06.040.

Staab, J.

WE CONCUR:

Fearing, J.

Lawrence-Berrey, J.

Appendix B

Tristen L. Worthen
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CASE # 379116
State of Washington v. Tommy-Joel P. Quiroz
KITTITAS COUNTY SUPERIOR COURT No. 1810040419

Counsel:

Enclosed is a copy of the order deciding a motion for reconsideration of this court's January 25, 2022 opinion.

A party may seek discretionary review by the Washington Supreme Court of a Court of Appeals' decision. RAP 13.3(a). A party seeking discretionary review must file a petition for review in this Court within 30 days after the attached order on reconsideration is filed. RAP 13.4(a). Please file the petition electronically through the Court's e-filing portal. The petition for review will then be forwarded to the Supreme Court. The petition must be received in this court on or before the date it is due. RAP 18.5(c).

If the party opposing the petition for review wishes to file an answer, that answer should be filed in the Supreme Court within 30 days of the service on the party of the petition. RAP 13.4(d). The address of the Washington Supreme Court is Temple of Justice, P.O. Box 40929, Olympia, WA 98504-0929.

Sincerely,

Tristen L. Worthen
Clerk/Administrator

TLW:ko
Enc.

FILED
MARCH 3, 2022
In the Office of the Clerk of Court
WA State Court of Appeals, Division III

COURT OF APPEALS, DIVISION III, STATE OF WASHINGTON

STATE OF WASHINGTON, Respondent, v. TOMMY JOEL P QUIROZ, Appellant.	)	No. 37911-6-III ORDER DENYING MOTION FOR RECONSIDERATION

THE COURT has considered appellant's motion for reconsideration and is of the opinion the motion should be denied. Therefore,

IT IS ORDERED, the motion for reconsideration of this court's decision of January 25, 2022 is hereby denied.

PANEL: Staab, Fearing, Lawrence-Berrey

FOR THE COURT:

REBECCA PENNELL
Chief Judge

NIELSEN KOCH & GRANNIS P.L.L.C.

March 16, 2022 - 12:01 PM

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