Supreme Court No. 96310-0
COA No. 76154-4-I

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

CURTIS LAMONT WHITFIELD,

Petitioner.

PETITION FOR REVIEW

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A. IDENTITY OF PETITIONER/DECISION BELOW

Curtis Lamont Whitfield requests this Court grant review pursuant to RAP 13.4 of the unpublished decision of the Court of Appeals in State v. Whitfield, No. 76154-4-I, filed August 6, 2018. A copy of the Court of Appeals' opinion is attached as an appendix.

B. ISSUES PRESENTED FOR REVIEW

1. Relying on a 30-year-old case, the Court of Appeals held Whitfield was not entitled to a jury instruction on a lesser-included offense because the instruction was inconsistent with his own testimony. But subsequent cases from this Court and the Court of Appeals make clear that the evidence establishing the lesser offense need not come from the defendant or be consistent with the defendant's testimony. Any doubts about whether to provide an instruction on a lesser-included offense should be resolved in favor of the defendant. Does the Court of Appeals' opinion conflict with this case law and present an issue of substantial public interest warranting review? RAP 13.4(b)(1), (2), (4).

2. The Court of Appeals agreed with Whitfield that the jury instruction defining "threat" was erroneous. Did the court err in concluding the error was harmless? RAP 13.4(b)(1), (4).

C. STATEMENT OF THE CASE

1. The State presented evidence that Whitfield wrongfully took money from a bank with the intent to steal it.

On December 8, 2014, at around 9:30 a.m., Curtis Whitfield entered the White Center branch of the US Bank. RP 820-24, 835. He had opened an account at the bank in December 2012 but the bank closed his account two months later. RP 722.

Whitfield approached the teller Christine Ponce and asked for money. According to Ponce, Whitfield said either, "Give me all your money. I'm going to kill you," or "Give me $10,000 or I'll kill you." RP 412-13, 431, 441; see also RP 355 (911 call). Ponce gave Whitfield all of the money in her drawer, which was $3,179. RP 403, 412.

Hidden in the money that Ponce gave to Whitfield was a GPS tracking device. RP 355, 414-16, 431. Also, the serial numbers of some of the bills had been recorded. RP 359.

Ponce triggered an alarm as soon as Whitfield approached her window, before he even said anything. RP 414. Ponce was suspicious of Whitfield because he was dressed in black and wearing a hoodie and sunglasses. RP 413-14.

The police stopped Whitfield about 30 minutes later at a nearby apartment complex. RP 296, 477-78. They determined his location from the tracking device hidden in the money. RP 298, 308-09, 453-60. The serial numbers of some of the bills in his pocket matched the serial numbers of bills from Ponce's drawer. RP 397-99.

Whitfield was charged with one count of first degree robbery of a financial institution. CP 28. He waived his right to the assistance of counsel and represented himself at trial. RP 144-73.

2. Whitfield presented evidence that he did not use or threaten to use force in order to take the money.

At trial, Whitfield acknowledged he was at the bank that morning and took money from Ponce. RP 820. But he adamantly denied threatening her or using the word "kill." RP 820-22, 827. He did not intend to rob, hurt or threaten anyone. RP 817-19, 828.

It is undisputed that Whitfield did not use a weapon or a demand note. RP 308, 352, 821-22, 841.

Whitfield said he went to the bank to withdraw money he believed was his from the account he believed was still open. RP 818-24, 835. He said he thought he had at least $2,700 in his account. RP 818. He did not realize the bank had closed his account. He did not

receive the notice from the bank telling him that his account was closed because he was in prison from February 2013 to February 2014. RP 722, 817-18.

Whitfield explained he was depressed and suicidal and not thinking clearly. RP 818-19, 823, 833. He had tried to commit suicide two weeks before the incident. RP 818. He had been using drugs for two to three months straight, after 22 years of sobriety. RP 819, 833. Although he did not use drugs that morning, he was not in his right mind due to his recent drug use and ongoing depression. RP 835.

Whitfield also testified he went to the bank intending to commit "suicide by cop" due to his depression. RP 819, 833-35.

3. Whitfield requested an instruction on the lesser included offense of theft but the court refused to provide it.

Whitfield requested that the jury be instructed on the lesser-included offense of theft, given his testimony that he did not threaten Ponce. RP 847. The State objected. RP 849. The court denied the request, ruling the facts did not support the instruction because Whitfield denied committing a theft. RP 853.

The jury found Whitfield guilty of first degree robbery as charged. CP 68. Whitfield appealed, arguing the trial court erred in

failing to instruct the jury on the lesser-included offense. He also challenged the jury instruction defining the element of "threat." The Court of Appeals affirmed.

D. ARGUMENT WHY REVIEW SHOULD BE GRANTED

1. The Court of Appeals' conclusion that the evidence did not warrant a lesser-included instruction conflicts with the controlling case law.

a. The Court of Appeals mis-applied the case law.

The Court of Appeals erred in concluding that Whitfield was not entitled to a jury instruction on the lesser-included offense of theft. The court held Whitfield was not entitled to the instruction because it contradicted his own testimony that he did not intend to take money from the bank and was only asking for money he believed was in his account. Slip Op. at 5. Citing a 30-year-old case, the court reasoned, "'[w]here acceptance of the defendant's theory of the case would necessitate acquittal on both the charged offense and the lesser included offense, the evidence does not support an inference that only the lesser was committed.'" Slip Op at 5 (quoting State v. Speece, 56 Wn. App. 412, 419, 783 P.2d 1108 (1989), aff'd, 115 Wn.2d 360, 798 P.2d 294 (1990)).

The Court of Appeals' reliance on Speece is erroneous because it conflicts with the subsequent controlling case law, which provides that a defendant is entitled to an instruction on a lesser-included offense if some evidence *from whatever source* supports it.

A defendant has a statutory right to a jury instruction on a lesser included offense when (1) each of the elements of the lesser offense is a necessary element of the charged offense and (2) the evidence in the case supports an inference that the lesser crime was committed. State v. Workman, 90 Wn.2d 443, 447-48, 584 P.2d 381 (1978); RCW 10.61.006.

The right to have the jury instructed on a lesser-included offense "helps protect the integrity of our criminal justice system by ensuring that juries considering defendants who are 'plainly guilty of *some* offense' do not set aside reasonable doubts in order to convict them and avoid letting them go free." State v. Henderson, 182 Wn.2d 734, 742, 344 P.3d 1207 (2015) (quoting Keeble v. United States, 412 U.S. 205, 212-13, 93 S. Ct. 1993, 36 L. Ed. 2d 844 (1973)). To minimize this risk, courts must err on the side of instructing juries on lesser-included offenses. Henderson, 182 Wn.2d at 736.

Here, each of the elements of the lesser offense—theft—is a necessary element of the charged offense—first degree robbery. One of the elements of robbery is that the defendant unlawfully took property from another with the intent to commit a theft. RCW 9A.56.190; CP 60, 64 (jury instructions). A robbery is a theft committed in a person's presence through the use or threatened use of force. State v. Farnsworth, 185 Wn.2d 768, 775, 374 P.3d 1152 (2016).

To determine if the second prong of the Workman test is met, the Court views the evidence in the light most favorable to the party requesting the instruction. State v. Fernandez-Medina, 141 Wn.2d 448, 455-56, 6 P.3d 1150 (2000). If a jury could rationally find the defendant guilty of the lesser offense and not the greater offense, the jury must be instructed on the lesser offense. Id. at 456.

To warrant an instruction on the lesser offense, at least some of the evidence must affirmatively establish that offense. Id. It is not enough that the jury might simply disbelieve the evidence pointing to guilt of the greater offense. Id.

But there is no requirement that the evidence establishing the lesser offense must come from the defendant or that the defendant's testimony cannot contradict this evidence. State v. McClam, 69 Wn.

App. 885, 889, 850 P.2d 1377 (1993); Fernandez-Medina, 141 Wn.2d at 457-61.

Contrary to the Court of Appeals' opinion in this case, a defendant who denies committing any crime may still be entitled to an instruction on a lesser offense, if there is some evidence from another source indicating that only the lesser crime was committed. McClam, 69 Wn. App. at 889; Fernandez-Medina, 141 Wn.2d at 457-61. An instruction on a lesser offense is especially warranted if the evidence of guilt is conflicting or inconsistent. Henderson, 182 Wn.2d at 737, 742.

The trial court must consider *all* of the evidence presented at trial when deciding whether to provide an instruction on a lesser offense. Fernandez-Medina, 141 Wn.2d at 456. The judge may not weigh or evaluate the evidence or discount theories it deems unreasonable. Id. at 460-61. Doing so would contravene the fundamental principle that "the finder of fact is the sole and exclusive judge of the evidence, the weight to be given thereto, and the credibility of witnesses." Id. (quotation marks and citation omitted). Courts must presume the jury has the ability to "separate the wheat from the chaff" and may not invade the jury's fact-finding province. Id.

The trial court must instruct the jury on a lesser-included offense whenever substantial evidence in the record—from whatever source—supports a rational inference that the defendant committed the lesser offense to the exclusion of the greater offense. Id.

The case law relied upon by the Court of Appeals, which holds that an instruction on a lesser-included offense must be consistent with the defendant's own testimony, is outdated and conflicts with these principles established in later cases. Review is therefore warranted. RAP 13.4(b) (1), (2), (4).

b. Sufficient evidence supported an instruction on the lesser-included offense.

When the evidence is viewed in the light most favorable to Whitfield, it supports an inference that only the lesser crime of theft was committed. The State presented substantial affirmative evidence that Whitfield committed a theft. Although Whitfield had opened an account at the bank in December 2012, the bank closed his account two months later and sent a notice to Whitfield informing him of that fact. RP 722. Whitfield did not go to the bank to withdraw any money until nine months after he had been released from prison. RP 830. He said he thought he had $2,700 in his account, but that is not the amount of money he took. RP 355, 403, 412-13, 431, 441, 818.

At the same time, there was substantial evidence that Whitfield did not use or threaten to use force to take the money. He did not use a weapon or a demand note. RP 352, 821-22, 841. He affirmatively denied threatening Ponce, either directly or indirectly. RP 818-27.

The trial court and the Court of Appeals applied the incorrect legal standard by concluding the instruction was not warranted because Whitfield denied committing both a robbery and a theft. RP 853; Slip Op. at 5. As discussed, a defendant may be entitled to an instruction on a lesser-included offense even if he testifies and denies committing the lesser offense. McClam, 69 Wn. App. at 889; Fernandez-Medina, 141 Wn.2d at 457-61.

Substantial evidence supported an inference that Whitfield stole money from the bank without threatening the teller. The court was not permitted to weigh this evidence or reject the theory as unreasonable. Fernandez-Medina, 141 Wn.2d at 456, 460. It did not matter that the evidence supporting the theory came from multiple sources. To the contrary, because the evidence of guilt was conflicting, an instruction on the lesser offense was especially warranted. See Henderson, 182 Wn.2d at 737, 742.

2. The Court of Appeals erred in concluding that providing an erroneous instruction that mis-stated the essential element of "threat" was harmless.

The Court of Appeals agreed with Whitfield that the jury instruction defining "threat" was erroneous. Slip Op. at 6. But the court relied on State v. Gallaher to conclude the error was harmless because "the jury instruction defining robbery and the to convict instruction correctly identified that the defendant must use or threaten the use of 'immediate force' to be guilty of robbery." Slip Op. at 7 (citing State v. Gallaher, 24 Wn. App. 819, 821-22, 604 P.2d 185 (1979)). That conclusion is erroneous.

To prove a robbery, the State must prove the defendant unlawfully took personal property from the person of another or in her presence against her will "by the use or threatened use of immediate force, violence, or fear of injury to that person." RCW 9A.56.190. The threat must be to cause harm in the immediate future, *i.e.*, while the robbery is taking place. State v. Gallaher, 24 Wn. App. 819, 821-22, 604 P.2d 185 (1979). If the jury instruction defining the element of "threat" is broad enough to cover a threat of harm to take place subsequent to the robbery, it is erroneous. Id.

In Gallaher, the jury instruction defining "threat" in a robbery prosecution provided, "[t]hreat means to communicate, directly or indirectly the intent: to cause bodily injury *in the future* to the person threatened or to any other person." Id. at 821 (emphasis added). The court held the instruction was erroneous to the extent it allowed the jury to find the threat was to cause harm sometime subsequent to the robbery. Id. at 821-22.

Here, as in Gallaher, the jury instruction was erroneous because it did not limit the threat of harm to the "immediate" future. The jury instruction defining "threat" stated, "[t]hreat means to communicate, directly or indirectly, the intent to cause bodily injury *in the future* to the person threatened or to any other person." CP 61 (emphasis added). The instruction misstated the "threat" element because it allowed the jury to find Whitfield uttered a threat to cause harm to the teller sometime after the robbery.

A jury instruction that misstates an element of the crime is presumed prejudicial. It may be deemed harmless only if it appears beyond a reasonable doubt that the error did not contribute to the verdict obtained. State v. Brown, 147 Wn.2d 330, 340, 58 P.3d 889 (2002) (citing Neder v. United States, 527 U.S. 1, 119 S. Ct. 1827, 144

L. Ed. 2d 35 (1999)). That test is satisfied only if the element is supported by uncontroverted evidence. Brown, 147 Wn.2d at 341.

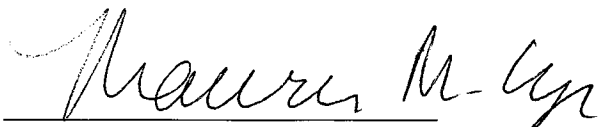
Here, contrary to the Court of Appeal's conclusion, the erroneous instruction mis-stating the essential element of "threat" was not harmless. The element was not supported by uncontroverted evidence. Whitfield denied threatening the teller. RP 818-27.

Because the evidence of a "threat" was not uncontroverted, the error in misstating that element in the jury instructions is not harmless. Brown, 147 Wn.2d at 341. The conviction must be reversed.

E. CONCLUSION

For the reasons provided, this Court should grant review.

Respectfully submitted this 30th day of August, 2018.



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APPENDIX

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

STATE OF WASHINGTON, Respondent, v. CURTIS LAMONT WHITFIELD, Appellant.	)	No. 76154-4-I UNPUBLISHED OPINION FILED: August 6, 2018

VERELLEN, J. — Curtis Whitfield appeals his conviction for first degree robbery. Because the evidence does not support an inference that Whitfield committed theft rather than robbery, we conclude the court did not abuse its discretion when it denied Whitfield's request to instruct the jury on the lesser included offense.

Whitfield also assigns error to the giving of jury instruction 8, defining the term "threat." Although we conclude jury instruction 8 was given in error, in light of the other instructions, it was not reversible error.

Therefore, we affirm.

FACTS

On December 8, 2014, Whitfield entered the White Center branch of U.S. Bank and approached the teller. According to the teller, Christina Ponce, Whitfield

said, "Give me $10,000 or I'll kill you."[1] Ponce gave Whitfield all the money in her drawer. A tracking device was included with the money, some of the serial numbers were recorded, and Ponce triggered the alarm. Around 30 minutes later, police found Whitfield nearby in possession of bills with matching serial numbers.

The State charged Whitfield with first degree robbery. At trial, Whitfield denied threatening to kill Ponce. The court denied Whitfield's request for a jury instruction on the lesser included offense of theft. The jury found Whitfield guilty as charged.

Whitfield appeals.

ANALYSIS

I. Lesser Included

Whitfield contends the trial court abused its discretion when it refused to instruct the jury on the lesser included offense of theft.

"A defendant is entitled to an instruction on a lesser included offense when (1) each of the elements of the lesser included offense is a necessary element of the charged offense and (2) the evidence in the case supports an inference that the lesser crime was committed."[2] Courts refer to the first part of the test as the "legal prong" and the second part as the "factual prong."[3] On appeal, the State does not contest the legal prong.

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[1] Report of Proceedings (RP) (Sept. 22, 2016) at 413.

[2] State v. Henderson, 182 Wn.2d 734, 742, 344 P.3d 1207 (2015).

[3] State v. Berlin, 133 Wn.2d 541, 546, 947 P.2d 700 (1997).

We review a trial court's decision under the factual prong for abuse of discretion.[4] In determining the factual prong, we review "the evidence in the light most favorable to the party requesting the instruction."[5] The evidence must raise an inference that only the lesser included offense was committed instead of the charged offense.[6]

Whitfield was charged with first degree robbery. A person commits robbery

> when he or she unlawfully takes personal property from the person of another or in his or her presence against his or her will by the use or threatened use of immediate force, violence, or fear of injury to that person or his or her property or the person or property of anyone. Such force or fear must be used to obtain or retain possession of the property, or to prevent or overcome resistance to the taking; in either of which cases the degree of force is immaterial. Such taking constitutes robbery whenever it appears that, although the taking was fully completed without the knowledge of the person from whom taken, such knowledge was prevented by the use of force or fear.[7]

Whitfield requested the jury be instructed on the lesser included offense of theft. Theft means "[t]o wrongfully obtain or exert unauthorized control over the property or services of another or the value thereof, with intent to deprive him or her of such property or services."[8] Theft does not include the "use or threatened use of immediate force, violence, or fear of injury."

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[4] Henderson, 182 Wn.2d at 743.

[5] State v. Wade, 186 Wn. App. 749, 772, 346 P.3d 838 (2015).

[6] State v. Fernandez-Medina, 141 Wn.2d 448, 455, 6 P.3d 1150 (2000).

[7] RCW 9A.56.190.

[8] RCW 9A.56.020.

According to Ponce, the bank teller, Whitfield said, "Give me $10,000 or I'll kill you."[9] Ponce gave Whitfield all the money in her drawer. A tracking device was included with the money, some of the serial numbers were recorded, and the teller triggered the alarm.

At trial, Whitfield testified he never intended to rob the bank and rather, he mistakenly believed he had money in his account:

> Not once did I threaten that teller; not once did I ever say the word "kill" to Christina Ponce. You know why I didn't have to say the word "threat"—"kill" to Ms. Christina Ponce? Because I only went, asking for the money I thought I had in that bank.[10]

Whitfield claimed he only told the teller, "Give me my money."[11] And Whitfield argued the teller lied when she testified that he threatened to kill her. But it is not enough that the jury may disbelieve some evidence.[12]

Whitfield contends his denial that he threatened Ponce, along with the lack of other evidence of a threat, raises an inference that only theft was committed instead of robbery.

The State argues Whitfield may not request a theft instruction because his testimony about his mistaken belief is inconsistent with such an instruction. "The jury may always disbelieve any portion of a witness's testimony, 'but if the

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[9] RP (Sept. 22, 2016) at 412.

[10] RP (Sept. 27, 2016) at 820.

[11] Id. at 827.

[12] See Fernandez-Medina, 141 Wn.2d at 455-56.

defendant would urge as an alternative theory that he committed only [the included crime], some evidence must be presented affirmatively to establish that theory.'"[13]

At trial, Whitfield advanced a single theory, that he did not intend to take the money from the bank, that he was only asking for money he believed was in his account. If believed, this theory would require the jury to acquit Whitfield of the charged crime of robbery and the requested lesser included of theft. "Where acceptance of the defendant's theory of the case would necessitate acquittal on both the charged offense and the lesser included offense, the evidence does not support an inference that only the lesser was committed."[14]

Because the evidence does not support an inference that Whitfield committed theft rather than robbery, we conclude the court did not abuse its discretion when it in denied Whitfield's request to instruct the jury on the lesser included offense.

II. Jury Instruction

Whitfield argues jury instruction 8 defining threat misstates the law. For this reason, Whitfield asks this court to reverse his conviction.

The panel reviews errors of law in jury instructions under the de novo standard.[15] "Jury instructions are proper when they permit the parties to argue

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[13] State v. Rodriquez, 48 Wn. App. 815, 820, 740 P.2d 904 (1987) (alteration in original) (quoting State v. Wheeler, 22 Wn. App. 792, 797, 593 P.2d 550 (1979)).

[14] State v. Speece, 56 Wn. App. 412, 419, 783 P.2d 1108 (1989), affirmed, 115 Wn.2d 360, 798 P.2d 294 (1990).

[15] State v. Barnes, 153 Wn.2d 378, 382, 103 P.3d 1219 (2005).

their theories of the case, do not mislead the jury, and properly inform the jury on the applicable law."[16]

Even if a jury instruction is improper, reversal is appropriate only if the error is prejudicial. "It is reversible error to instruct the jury in a manner that would relieve the State of [its] burden" to prove "every essential element of a criminal offense beyond a reasonable doubt."[17] But "[i]f the instructions as a whole fairly state the law, then there is no prejudicial error."[18]

Here, jury instruction 8 provided, "Threat means to communicate, directly or indirectly, the intent to cause bodily injury *in the future* to the person threatened or to any other person."[19] But under the statute defining robbery, "A person commits robbery when he or she unlawfully takes personal property from the person of another or in his or her presence against his or her will by the use or threatened use of *immediate* force, violence, or fear of injury to that person."[20]

In State v. Gallaher, Division Three of this court considered an identical threat instruction where the defendant was convicted of second degree robbery.[21] The court determined the threat instruction was improper "[i]nsofar as the

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[16] Id.

[17] State v. Pirtle, 127 Wn.2d 628, 656, 904 P.2d 245 (1995).

[18] State v. Gallaher, 24 Wn. App. 819, 823, 604 P.2d 185 (1979).

[19] Clerk's Papers (CP) at 61.

[20] RCW 9A.56.190 (emphasis added).

[21] 24 Wn. App. 819, 604 P.2d 185 (1979).

instruction includes threats of harm to take place subsequent to the robbery."[22] Similarly here, jury instruction 8, defining threat, was given in error.

In Gallaher, Division Three concluded, "[T]he instructions considered as a whole adequately advise the jury that a threat of immediate force was required to convict the defendant of a robbery."[23] There, the jury instruction defining robbery and the to convict instruction correctly identified that the defendant must use or threaten the use of "immediate force" to be guilty of robbery.[24]

Here, the jury instruction defining robbery was virtually identical to the instruction in Gallaher:

> A person commits the crime of robbery when he or she unlawfully and with intent to commit theft thereof takes personal property from the person or in the presence of another who has an ownership, representative, or possessory interest in that property, against that person's will by the use or threatened use of *immediate* force, violence, or fear of injury to that person or to the person's property.[25]

And the to convict instruction given in this case correctly stated:

> To convict the defendant of the crime of robbery in the first degree, each of the following six elements of the crime must be proved beyond a reasonable doubt:
>
> . . . .
>
> (3) That the taking was against the person's will by the defendant's use or threatened use of *immediate* force, violence or fear of injury to that person. [26]

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[22] Id. at 822.

[23] Id.

[24] Id.

[25] CP at 59 (emphasis added).

[26] CP at 64 (emphasis added).

Because the other instructions correctly identified the requirement of immediate force, the instructions did not relieve the State of its burden to prove every element of the crime beyond a reasonable doubt. Although we conclude jury instruction 8 was given in error, in light of the other instructions, it was not a reversible error.

Therefore, we affirm.

WE CONCUR:

DECLARATION OF FILING AND MAILING OR DELIVERY

The undersigned certifies under penalty of perjury under the laws of the State of Washington that on the below date, the original document **Petition for Review to the Supreme Court** to which this declaration is affixed/attached, was filed in the **Court of Appeals** under **Case No. 76154-4-I**, and a true copy was mailed with first-class postage prepaid or otherwise caused to be delivered to the following attorney(s) or party/parties of record at their regular office or residence address as listed on ACORDS:

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