SUPREME COURT NO. 98528-6

NO. 79043-9-I

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

SERGIO LOPEZ,

Petitioner.

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

The Honorable John F. McHale, Judge

PETITION FOR REVIEW

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RULES, STATUES AND OTHER AUTHORITIES

A. IDENTITY OF PETITIONER/COURT OF APPEALS DECISION

Petitioner Sergio Lopez, the appellant below, seeks review of the court of appeals decision in State v. Lopez, noted at __ Wn. App. 2d __, 2020 WL 1852434, No. 79043-9-I (Apr. 13, 2020).

B. ISSUES PRESENTED FOR REVIEW

The to-convict instruction required the State to prove Sergio Lopez "unlawfully took personal property from the person or in the presence of another" and "the taking was against that person's will by the defendant's use or threated use of immediate force, violence, or fear of injury to that person." Where the State failed to offer evidence supporting that Lopez "took" printer toner cartridges when he lifted them from store shelves outside the presence of any person, should Lopez's second degree robbery conviction by reversed and dismissed?

C. STATEMENT OF THE CASE

On June 22, 2017, Phong Vuu, the manager of a Staples store in Kent, responded to an alarm going off on one of the toner cartridges. RP 269. Vuu found only one person in the toner cartridge aisle and this person appeared surprised at the alarm; Vuu apologized to this person, turned the alarm off, reactivated the alarm, and placed the toner cartridge back on the shelf. RP 269-70.

Another alarm went off shortly thereafter. Another Staples employee went to the same aisle to deactivate and reactivate the alarm; the same person, whom Vuu identified as Lopez, was the only person in the aisle at the time. RP 270.

Shortly after that, a "flurry of alarms," meaning three, went off. RP 271. Vuu saw the man he had interacted with moving quickly toward the front of the store. RP 271. Vuu saw three toner boxes in the man's bag and the man had pulled out a knife. RP 272. As Vuu approached, Vuu said, "he told me that if I got any closer that he would stab me." RP 273. Vuu permitted the man to walk out of the store and took a picture of him walking in the parking lot while he instructed another Staples supervisor to phone police. RP 273, 275.

Police officer John Waldo responded and obtained the photo Vuu took. RP 294-96. Another officer, Gerald Gee, blew up the photo and believed he recognized the man as Lopez. RP 300-02. He showed the photo to Amanpreet Johal, an employee of Howard Johnson's (now Econo Lodge) motel where Lopez had previously stayed for an extended period of time. RP 302-03. Johal testified he recognized Lopez in the photo. RP 319.

Gee testified he used Leads Online, an online, open source service that records all pawn transactions, to search pawn shops for sales of toner, which led him to Gold & Silver Trading in Renton. RP 303-04. Gee went to

Gold & Silver Trading and stated he located three large toner cartridges. RP 303. Gold & Silver also had a video surveillance system showing the person who had sold the toner approximately 45 minutes after the theft from Staples, and the videos were shown to the jury. RP 243-44, 247-50, 309-12. Gee noted that the video appeared to depict Lopez. RP 312.

The State charged Lopez with second degree robbery. CP 1. The jury was instructed that it must find the following elements of second degree robbery beyond a reasonable doubt:

> (1) That on or about June 22, 2017, the defendant unlawfully took personal property from the person or in the presence of another;
>
> (2) That the person was acting as a representative of the owner of the property taken;
>
> (3) That the defendant intended to commit theft of the property;
>
> (4) That the taking was against that person's will by the defendant's use or threatened used of immediate force, violence or fear of injury to that person or to that person's property or to the person or property of another;
>
> (5) That force or fear was used by the defendant to obtain or retain possession of the property or to prevent or overcome resistance to the taking or to prevent knowledge of the taking; and
>
> (6) That any of these acts occurred in the State of Washington.

CP 39; see also RP 348-49.

The jury found Lopez guilty of second degree robbery. CP 21. The trial court imposed a standard range sentence of six months. CP 53.

Lopez appealed. CP 64. He challenged the sufficiency of the evidence to convict in light of the language of the robbery to-convict instruction, and the court of appeals rejected his argument.

D. ARGUMENT

THE ROBBERY PATTERN INSTRUCTION REQUIRES THAT THE TAKING OF THE PROPERTY—NOT JUST THE RETENTION OF PROPERTY AFTER THE TAKING—BE FROM THE PERSON OR IN A PERSON'S PRESENCE BY THREATS, FORCE, VIOLENCE OR FEAR, WHICH THE STATE FAILED TO PROVE

The due process clause of the Fourteenth Amendment requires the State to prove every element of an offense beyond a reasonable doubt. Jackson v. Virginia, 443 U.S. 307, 316, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979); State v. Green, 94 Wn.2d 216, 220-21, 616 P.2d 628 (1980). Whenever an allegation is included in the to-convict instruction, it becomes the law of the case and must be proved by the State beyond a reasonable doubt, just like any other element. State v. Hickman, 135 Wn.2d 97, 101-02, 954 P.2d 900 (1998); State v. Nam, 136 Wn. App. 698, 706-07, 150 P.3d 617 (2007) (applying Hickman to robbery to-convict instruction).[1] On

[1] As the Washington Supreme Court stated long ago,

> It is the approved rule in this state that the parties are bound by law laid down by the court in its instructions where, as here, the

review, the court views the evidence in the light most favorable to the prosecution, asking whether a rational trier of fact could find all elements of the charged crime beyond a reasonable doubt. State v. Vasquez, 178 Wn.2d 1, 6, 309 P.3d 318 (2013).

Hickman controls the application of these principles here. Hickman was charged with insurance fraud for presenting a false insurance claim regarding the theft of his car. 135 Wn.2d at 100. Although there was no legal requirement that the State prove the county in which the crime occurred, the to-convict instruction required proof that a false or fraudulent claim "occurred in Snohomish County Washington." Id. at 101. Hickman challenged the sufficiency of this element on appeal, arguing the evidence showed he was in Hawaii when he filed his claim and the insurer was located in King County, not Snohomish. Based on the lack of evidence that the crime occurred in Snohomish County, the Washington Supreme Court reversed and dismissed Hickman's conviction. Id. at 105.

The result here should be the same. Even viewed in the light most favorable to the prosecution, the evidence presented did not satisfy the first

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> charge is approved by counsel for each party, no objections or exceptions thereto having been made at any stage. In such case, the sufficiency of the evidence to sustain the verdict is to be determined by the law application of the instructions and rules of law laid down in the charge.

Tonkovich v. Dep't of Labor & Indus., 31 Wn.2d 220, 225, 195 P.2d 638 (1948).

or third elements in the to-convict instruction, which, respectively, required proof that "the defendant unlawfully took personal property from the person or in the presence of another" and "the taking was against that person's will by the defendant's use or threatened use of immediate force, violence, or fear of injury to that person[.]" CP 39 (emphasis added). These elements mirror the statutory definition of the crime of 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.

RCW 9A.56.190.

The Washington courts have interpreted this statute to criminalize any taking of property by force, even when force is used only to retain property that has already been taken. Thus, where a shoplifter initially takes property without the use of force, moves to the exit, and then uses force to retain the property when confronted, the crime committed is still robbery despite the absence of force used to take the property at the outset. State v. McIntyre, 112 Wn. App. 478, 481-82, 49 P.3d 151 (2002) (discussing State

v. Handburgh, 119 Wn.2d 284, 830 P.2d 641 (1992), and State v. Manchester, 57 Wn. App. 765, 790 P.2d 217 (1990)).

This interpretation is consistent with legislative history. When the legislature adopted the current definition of robbery, it deleted a phrase indicating that the use of force '"merely as a means of escape . . . does not constitute robbery."' McIntyre, 112 Wn. App. at 482 (alteration in original) (quoting Manchester, 57 Wn. App. at 770). "'This change indicates the Legislature's intent to broaden the scope of taking, for purposes of robbery, by including violence during flight immediately following the taking.'" Id.

While McIntyre and Manchester might make it clear that the legislature intended to criminalize Lopez's conduct as robbery, this intent does not control under the law of this case. The to-convict instruction given to Lopez's jury required greater proof than the statute requires.

Jurors are presumed to interpret instructions in a normal, commonsense manner rather than in a strained or hypertechnical one. State v. Moultrie, 143 Wn. App. 387, 394, 177 P.3d 776 (2008). Jurors were not made aware of the history of the robbery statute, the legislature's intent in criminalizing robbery, or case law interpreting the statute in light of such history and intent. On the contrary, the jury's only guide was the instructions given in this case. Read in a normal, commonsense fashion, the to-convict instruction, particularly elements 1 and 4, required a taking of

property from the person or in the presence of another and force used at the time this taking of property occurred.

This conclusion is supported by recognizing that all the elements of robbery in the jury instructions were separated by a conjunctive "and," including element 5, which read, "force or fear was used by the defendant to obtain or retain possession of the property or to prevent or overcome resistance to the taking or to prevent knowledge of the taking . . . ." CP 39. The use of force or fear to obtain or retain property is a separate requirement of proof from the element requiring that the taking of the property is from the person or in the presence of another and that is a separate proof requirement from the element requiring the taking to be against the person's will by use of force. Per the jury instructions, it is beyond dispute that the State was required to prove that the taking occurred from the person in the presence of another and the taking was accomplished by force or fear and force or fear was used to obtain or retain possession of the property.

The first element in the to-convict required proof that Lopez "unlawfully took personal property from the person or in the presence of another." CP 39. Jurors would have interpreted this as referring to the initial taking in the Staples store when Lopez took toner boxes off the shelf. RP 271 (testimony that Vuu heard alarms and saw man moving quickly toward exit). Jurors would have contrasted this element with the fifth element,

which discusses force used to "retain possession of the property," which would further support a commonsense interpretation that the first element addresses only the initial taking.[2] There was no proof that Lopez initially took the toner from another's person; nor was there proof that he took the toner in another's presence.

The Manchester court recognized this distinction, defining "presence" as taking something "so within [the victim's] reach, inspection, observation or control, that he could, if not overcome with violence or prevented by fear, retain his possession of it." 57 Wn. App. 768-69 (alteration and footnote omitted in original) (quoting 4 C. TORCIA, WHARTON'S CRIMINAL LAW § 473 (14th ed. 1981)). The Manchester court found it questionable whether property was taken in the presence of another where the store manager observed the taking from 15 to 18 feet away on one occasion and store security personnel watched from an unknown distance on another occasion. Id. at 766-69.

Here, Lopez was observed by a store manager and another employee in a store aisle where printer toner is kept. RP 269. Toner cartridge alarms went off twice and store employees responded by stopping these alarms and then reactivating them. RP 269-70. When alarms went off a third time, no

[2] Along similar lines, jurors could not have found under the fifth element that Lopez used force or fear to *obtain* the property, because no one was in Lopez's vicinity when he obtained the property. Jurors could find only that Lopez used force or fear to retain the property he had already taken or obtained.

one other than Lopez was in the toner aisle. RP 271. When Lopez took the toner, the toner was not within any the manager's or any other store employee's reach or control. Therefore, the toner was not taken in the presence of another.

No one was around Lopez when the taking occurred. Thus, the taking was not from the person of another, either. "The literal interpretation of taking something from another's person would be to take something on the person's body or directly attached to someone's physical body or clothing." Nam, 136 Wn. App. at 705-06 (relying on definition in 3 WAYNE R. LAFAVE, SUBSTANTIVE CRIMINAL LAW § 20.3 at 179 (2d ed. 2003) to hold that "'person' in our robbery statute means something on or attached to a person's body or clothing"). When Lopez took the toner, he did not do so from the person of another or in the presence of another. There was insufficient evidence of this element in the to-convict instruction.

As with the first element in the to-convict, element 4 also refers to the taking, requiring proof that "the taking was against that person's will by the defendant's use or threatened use of immediate force, violence, or fear of injury to that person." CP 39. Again, when the taking occurred, no one was present and so no one was threatened with force, violence, or fear of injury at the time of the taking. There simply was no evidence to support element 4.

Lopez concedes that element 5 of the to-convict instruction was satisfied with sufficient evidence. Element 5 required proof that "force or fear was used by the defendant to obtain or retain possession of the property or to prevent or overcome resistance to the taking." CP 57 (emphasis added). The evidence was sufficient to show Lopez used force to retain the property he had already taken when he allegedly stated he would stab Vuu if Vuu came any closer. RP 273. But there was no evidence he used the force or fear to obtain the property at the outset, at the time the property was taken.

The court of appeals decision conflicts with the constitutional principles in Hickman and its progeny, meriting RAP 13.4(b)(1), (2), and (3) review. The court claimed that the to-convict instruction did not require greater proof that required by the robbery statute. Op., 4-6. It provided no analysis as to how this is so, other than to call Lopez's arguments "unpersuasive" and reach this bare conclusion.

To be sure, Lopez fully acknowledges (and has fully acknowledged throughout the appeal) the transactional theory of robbery as set out by the case law, described above. See Br. of Appellant 6-7; Op., 4 & n.11 (describing transactional approach, citing Handburgh, 119 Wn.2d at 293, as though the pattern jury instruction reflects the approach). But, while case law might collapse the fifth pattern instruction element into the first and fourth under the transactional approach to the crime of robbery, nowhere is

this made clear in the jury instructions. Read in a straightforward and commonsense manner, the instructions required proof that Lopez initially took the toner from the person or in the presence of another and used actual or threatened force or fear to do so. There was no proof of these elements, yet the instructions required independent proof of these elements. Hickman, 135 Wn.2d at 101-02; Nam, 136 Wn. App. at 706-07. The court of appeals decision conflicts with these basic, constitutional principles, necessitating review under RAP 13.4(b)(1), (2), and (3).

In its only substantive comment on this subject, the court of appeals suggests that the robbery statute "does not require the taking occur in the direct view of another. In fact, the statute contemplates a situation where the taking 'was fully completed without the knowledge of the person from whom taken.'" Op., 6 & n.17 (quoting RCW 9A.56.190). The decision misleadingly quotes the statute, which actually reads, "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." RCW 9A.56.190 (emphasis added). Contrary to the court of appeals decision, a taking without knowledge is a robbery only where the defendant prevents such knowledge by use of force or fear. The court's reasoning conflicts with Manchester, 57 Wn. App. 768-69, and Nam, 136 Wn. App. 705-06, which

establish takings must be in the actual presence of or from the actual person of another. Manchester also casts serious doubt that observing a taking from a distance or on video could satisfy the presence element. 57 Wn. App. at 766-69. In this case, it cannot be disputed the Lopez removed toner from store shelves when no one was near him. They were therefore not taken from the person or in the presence of another. The court of appeals' suggestion that robberies need not occur in the direct view of another conflicts with Nam and Manchester on what the from-the-person/presence robbery means as a matter of constitutional sufficiency, warranting RAP 13.4(b)(2) and (3) review.

The State's evidence was insufficient under the law of this case. Accordingly, Lopez's robbery conviction must be reversed and dismissed. Hickman, 135 Wn.2d at 103. Because the court of appeals decision conflicts with basic principles and cases regarding constitutional sufficiency under the due process clauses, review should be granted pursuant to RAP 13.4(b)(1), (2), and (3).

E. CONCLUSION

For the reasons stated, Lopez asks that this petition for review be granted.

DATED this 13th day of May, 2020.

Respectfully submitted,

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

STATE OF WASHINGTON, Respondent, v. SERGIO LOPEZ, Appellant.	)	No. 79043-9-I UNPUBLISHED OPINION

VERELLEN, J. — Sergio Lopez challenges his conviction for second degree robbery. He argues the to-convict instruction abandoned the transactional theory of robbery and under the law of the case doctrine, the State was obligated to prove Lopez took ink cartridges in the presence of a store employee. But the to-convict instruction did not abandon the transactional theory of robbery, and the instruction did not require greater proof than required under the statute. When the evidence is viewed in the light most favorable to the State, we conclude the jury could have found the essential elements of the crime beyond a reasonable doubt.

Therefore, we affirm.

FACTS

The State charged Lopez with second degree robbery. Following a trial, the jury convicted Lopez as charged. The court imposed a standard range sentence. Lopez appeals.

ANALYSIS

Lopez contends the State failed to present sufficient evidence of second degree robbery, as required by the to-convict jury instruction.

We review sufficiency of the evidence de novo.[1] "Under both the federal and state constitutions, due process requires that the State prove every element of a crime beyond a reasonable doubt."[2] To determine whether there is sufficient evidence to sustain a conviction, "we view the evidence in the light most favorable to the State and ask whether any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt."[3] "A claim of insufficiency admits the truth of the State's evidence and all inferences that reasonably can be drawn therefrom."[4]

A person is guilty of robbery, including second degree robbery, when they "unlawfully take[ ] 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,

[1] State v. Rich, 184 Wn.2d 897, 903, 365 P.3d 746 (2016).

[2] State v. Johnson, 188 Wn.2d 742, 750, 399 P.3d 507 (2017).

[3] State v. Elmi, 166 Wn.2d 209, 214, 207 P.3d 439 (2009) (quoting State v. Mines, 163 Wn.2d 387, 391, 179 P.3d 835 (2008)).

[4] State v. Salinas, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992).

violence, or fear of injury to that person or his or her property or the person or property of anyone."[5]

Here, the to-convict jury instruction for second degree robbery provided:

> To convict the defendant of the crime of robbery in the second degree, each of the following elements of the crime must be proved beyond a reasonable doubt:
>
> (1) That on or about June 22, 2017, the defendant unlawfully took personal property from the person or in the presence of another;
>
> (2) That the person was acting as a representative of the owner of the property taken;
>
> (3) That the defendant intended to commit theft of the property;
>
> (4) That the taking was against that person's will by the defendant's use or threatened use of immediate force, violence or fear of injury to that person or to that person's property or to the person or property of another;
>
> (5) That force or fear was used by the defendant to obtain or retain possession of the property or to prevent or overcome resistance to the taking or to prevent knowledge of the taking; and
>
> (6) That any of these acts occurred in the [s]tate of Washington.[6]

Lopez argues "[t]he to-convict instruction . . . required greater proof than the statute requires."[7] Specifically, Lopez contends "the State was required to prove that the taking occurred from the person in the presence of another and the taking

[5] RCW 9A.56.190.

[6] Clerk's Papers (CP) at 39.

[7] Appellant's Br. at 7.

was accomplished by force or fear and force o[r] fear was used to obtain or retain possession of the property."[8]

The to-convict instruction is identical to Washington's criminal pattern jury instruction (WPIC) 37.04.[9] "[P]attern instructions generally have the advantage of thoughtful adoption."[10] And here, WPIC 37.04 tracks RCW 9A.56.190 and the surrounding case law, which recognizes the transactional theory of robbery:

> The plain language of the robbery statute says the force used may be either to obtain or retain possession of the property. We hold the force necessary to support a robbery conviction need not be used in the initial acquisition of the property. Rather, the retention, via force against the property owner, of property initially taken peaceably or outside the presence of the property owner, is robbery.[11]

Lopez argues the word "and" after element 5 in the to-convict instruction requires the State to prove the taking occurred in the immediate presence of another and the taking, separate from retention of the property, was accomplished through "fear or force." These arguments are unpersuasive.

In State v. Hickman, our Supreme Court determined that "a defendant may assign error [on appeal] to elements added under the law of the case doctrine."[12] Under the law of the case doctrine, jury instructions not objected to become the

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[8] Id. at 8.

[9] 11 WASHINGTON PRACTICE: WASHINGTON PATTERN JURY INSTRUCTIONS: CRIMINAL 37.04 (4th ed. 2016) (WPIC).

[10] State v. Bennett, 161 Wn.2d 303, 308, 165 P.3d 1241 (2007).

[11] State v. Handburgh, 119 Wn.2d 284, 293, 830 P.2d 641 (1992).

[12] 135 Wn.2d 97, 102, 954 P.2d 900 (1998).

law of the case.[13] In Hickman, "the State acquiesced to jury instructions which included venue as an additional element [and as a result,] venue became an element for the State to prove in order to prevail."[14] The court ultimately reversed and dismissed Hickman's conviction because the State failed to prove beyond a reasonable doubt that the crime occurred in Snohomish County, as alleged in the jury instructions.[15]

This case is not analogous to Hickman. RCW 9A.56.190, as mirrored in WPIC 37.04, specifically provides the "force or fear must be used to obtain or retain possession of the property, or to prevent or overcome resistance to the taking."[16] The statute requires the taking occur in the presence of another, but it does not require the taking occur in the direct view of another. In fact, the statute contemplates a situation where the taking "was fully completed without the knowledge of the person from whom taken."[17]

In line with the statute and WPIC, here, the to-convict instruction defines "robbery" as the unlawful taking of personal property "in the presence of another."[18] Although element 4 of the instruction requires the taking be "against that person's will by the defendant's use or threatened use of immediate force,

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[13] Id.

[14] Id. at 105.

[15] Id. at 105-06.

[16] (Emphasis added.)

[17] RCW 9A.56.190.

[18] CP at 39.

violence or fear of injury," element 5 explains the "force or fear" may be used to "obtain or retain possession."[19] The to-convict instruction did not require greater proof than RCW 9A.56.190 requires.

Now we turn to the sufficiency of the evidence. On June 22, 2017, Phong Vuu, the manager of a Staples in Kent, reported to an alarm in the toner aisle. He saw Lopez in the aisle. Vuu turned off the alarm and apologized to the customer. Another employee reported to a second alarm in the toner aisle. Lopez was the only customer in the toner aisle. While Vuu was in the print department, several alarms went off in the toner aisle. Vuu saw Lopez "moving rather quickly behind the aisles towards the front of the store . . . [t]owards the exit."[20] Vuu tried to intercept Lopez and Vuu noticed Lopez had a reusable bag with "at least three" toners.[21] Lopez came towards Vuu with a knife. "[H]e told me that if I got any closer that he would stab me."[22] Vuu backed away and Lopez exited the store with the toners.

When this evidence is viewed in the light most favorable to the State, we conclude the jury could have found the essential elements of the crime beyond a reasonable doubt. Lopez took the cartridges from the store in the presence of Vuu by threatened use of force. The State presented sufficient evidence of second

[19] Id.

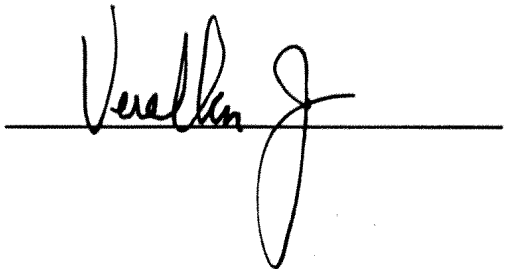
[20] Report of Proceedings (Aug. 8, 2019) at 271.

[21] Id. at 272.

[22] Id. at 273.

degree robbery, as alleged in the to-convict jury instruction, to sustain Lopez's conviction.

Therefore, we affirm.



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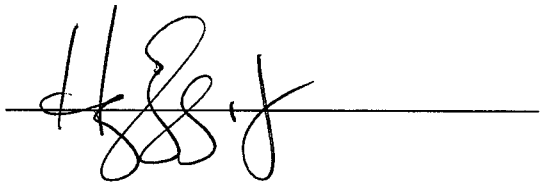

NIELSEN KOCH P.L.L.C.

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