No. 99419-6

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

CITY OF SEATTLE,
Respondent,

vs.

JOSE RODRIGUEZ,
Petitioner.

ANSWER TO PETITION FOR REVIEW

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A. IDENTITY OF RESPONDENT

The City of Seattle asks this court to deny review of the decision designated in Part B of this Answer.

B. COURT OF APPEALS DECISION

The Court of Appeals decision, entered on December 14, 2020, affirmed the Superior Court Decision on RALJ Appeal, which affirmed defendant's conviction for Sexual Exploitation.

C. ISSUE PRESENTED FOR REVIEW

Does defendant's overbreadth challenge to Seattle's Sexual Exploitation ordinance, which prohibits speech relating to the unlawful conduct of prostitution, involve a significant question of law under the state or federal constitution?

D. STATEMENT OF THE CASE

Defendant was convicted of Sexual Exploitation. He appealed, contending that the ordinance prohibiting his conduct is unconstitutionally overbroad and vague and the trial court erred in instructing the jury. The superior court rejected these contentions, and the Court of Appeals affirmed that decision.

Detective Tammie Case has worked as a police officer for ten years and has received training and has extensive experience working in undercover prostitution operations. CP 321-23. She had been provided with a cell phone for use in an undercover operation on January 20, 2016 and received text messages from defendant wanting a half-hour of sex for $80. CP 327 & 369-70. Defendant apparently had gotten the cell phone number from an advertisement. CP 370. Defendant did not show up, however. CP 369. He later told the detective that he showed up at the hotel, but she left him waiting. CP 370. On January 20 and 21, the detective received 17 text messages from defendant asking if she was still available. CP 369-70.

At approximately 9:45 pm on February 2, 2016, Detective Case was working as an undercover prostitute at a condominium in downtown Seattle. CP 326 & 362. She again received text messages from defendant wanting to meet up for sex. CP 328. She provided an address and told him she would meet him outside the condominium building. CP 329. When she got outside, she did not see anyone so called the number from which she had been receiving

the texts. CP 329. She saw defendant, who was across the street, answer his cell phone. CP 329 & 342-43. The detective directed defendant to her location and they went into the building to her room. CP 330. She asked him what he wanted, and defendant said he wanted a half-hour and just sex and agreed to pay $80. CP 331, 332-33, 337 & 358. He also said that he wanted just one girl. CP 331 & 361. Defendant gave $80 cash to Detective Case and she left and directed the arrest team to defendant. CP 331-32. During the encounter, the detective communicated with defendant in English and he responded to her questions. CP 335 & 356-57. She received a total of 94 text messages from defendant. CP 371.

Seattle Police Department Detective Ronald Brundage has extensive experience with undercover prostitution operations and put together the February 2, 2016 operation. CP 414-18 & 431. He received from Detective Case the $80 that defendant gave to her. CP 420-21 & 435.

The jury was instructed, in pertinent part, as follows:

> To convict the defendant of the crime of Sexual Exploitation, each of the following elements of the crime must be proved beyond a reasonable doubt:

> (1) That on or about February 2, 2016, the defendant agreed to pay a fee to another person pursuant to an understanding that in return therefor that person would engage in sexual conduct with the defendant; and
>
> (2) That the acts occurred in the City of Seattle.
>
> If you find from the evidence that each of these elements has been proved beyond a reasonable doubt, then it will be your duty to return a verdict of guilty.
>
> On the other hand, if, after weighing all of the evidence, you have a reasonable doubt as to any one of these elements, then it will be your duty to return a verdict of not guilty.

Instruction No. 8; CP 453-54.

E. ARGUMENT

Seattle's Sexual Exploitation ordinance is not unconstitutionally overbroad.

Defendant contends that the Sexual Exploitation ordinance is unconstitutionally overbroad because it prohibits content-based speech and does not include an intent element. Seattle Municipal Code 12A.10.040.A provides:

> A person is guilty of sexual exploitation if:
> 1. Pursuant to a prior understanding, he or she pays a fee to another person as compensation for such person or a third person having engaged in sexual conduct with him or her; or
> 2. He or she pays or agrees to pay a fee to another person pursuant to an understanding that in return therefor such person will engage in sexual conduct with him or her; or
> 3. He or she solicits or requests another person to engage in sexual conduct with him or her in return for a fee.

A statute is overbroad if it prohibits constitutionally protected speech; a law will be invalidated on its face for overbreadth only if it is "substantially overbroad."[1]

The first step in overbreadth analysis is to determine if a statute reaches constitutionally protected speech.[2] This ordinance does not. There is no constitutional protection for speech relating to unlawful commercial conduct.[3] The overbreadth doctrine does not apply to commercial speech.[4] Speech integral to criminal conduct is one of the categories of speech unprotected by the First Amendment.[5] In *Pittsburgh Press Company v. Pittsburgh Commission on Human Relations*,[6] the Supreme Court held that prohibiting a newspaper from publishing an advertisement relating

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[1] *State v. Pauling*, 149 Wn.2d 381, 386, 69 P.3d 331, *cert. denied*, 540 U.S. 986 (2003) (citations and quotations omitted).

[2] *State v. Halstien*, 122 Wn.2d 109, 122, 857 P.2d 270 (1993).

[3] *Pittsburgh Press Company v. Pittsburgh Commission on Human Relations*, 413 U.S. 376, 388, 93 S. Ct. 2553, 37 L. Ed. 2d 669 (1973).

[4] *Village of Hoffman Estates v. Flipside, Hoffman Estates, Inc.*, 455 U.S. 489, 497, 102 S. Ct. 1186, 71 L. Ed. 2d 362 (1982); *see also* 5 R. Rotunda & J. Nowak, *Treatise on Constitutional Law* § 20.8(f), at 49 (5th Ed. 2013) (the overbreadth doctrine does not really apply to commercial speech at all).

[5] *Rynearson v. Ferguson*, 355 F. Supp. 3d 964, 969 (W.D. Wash. 2019).

[6] 413 U.S. at 389.

to unlawful conduct does not violate the First Amendment. "Any First Amendment interest which might be served by advertising an ordinary commercial proposal and which might arguably outweigh the governmental interest supporting the regulation is altogether absent when the commercial activity itself is illegal and the restriction on advertising is incidental to a valid limitation on economic activity."[7] The court noted that "[w]e have no doubt that a newspaper constitutionally could be forbidden to publish a want ad proposing a sale of narcotics or soliciting prostitutes."[8] Similarly, in *Giboney v. Empire Storage & Ice Company*,[9] the court rejected the suggestion that the constitutional freedom of speech extends to speech used as an integral part of conduct in violation of a valid criminal statute.[10] Most recently, in *Erotic Service Provider Legal*

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[7] *Pittsburgh Press Company*, 413 U.S. at 389.

[8] *Pittsburgh Press Company*, 413 U.S. at 388.

[9] 336 U.S. 490, 498, 69 S. Ct. 684, 93 L. Ed. 834 (1949).

[10] In *New York v. Ferber*, 458 U.S. 747, 761–62, 102 S. Ct. 3348, 3357, 73 L. Ed. 2d 1113 (1982), relied on by defendant, the court, quoting *Giboney*, 336 U.S. at 498, stated "It rarely has been suggested that the constitutional freedom for speech and press extends its immunity to speech or writing used as an integral part of conduct in violation of a valid criminal statute." *see also Hawai'i v. Pegouskie*, 107 Haw. 360, 369, 113 P.3d 811 (Ct. App.), *cert. denied*, 107 Hawai'i 506 (2005) (rejecting 1st Amendment challenge to Prostitution ordinance because "[the

Education & Research Project v. Gascon,[11] the 9th Circuit court rejected a First Amendment challenge to a statute prohibiting soliciting or agreeing to engage in or engaging in any act of prostitution as the speech regulated by the statute is not constitutionally-protected commercial speech.[12]

There is no fundamental right to engage in prostitution or to solicit a prostitute.[13] Prostitution and procuring a prostitute is behavior which has never been a form of constitutionally protected

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defendant's] words were an integral part of her conduct in violating a valid statute prohibiting offers or agreements to engage in sex for a fee).

[11] 880 F.3d 450, 459-61 (9th Cir. 2018).

[12] *See also Wood v. United States*, 498 A.2d 1140, 1143 (D.C. 1985) (since the First Amendment does not protect "a solicitation to commit an act lawfully prohibited by statute," we hold that soliciting for the purpose of prostitution is not entitled to First Amendment protection.); *Connecticut v. Allen*, 37 Conn. Supp. 506, 512, 424 A.2d 651 (1980) (statute prohibiting offering or agreeing to engage in sexual conduct for a fee valid restriction on commercial speech); *United States v. Moses*, 339 A.2d 46, 53 (D.C. 1975), *cert. denied*, 426 U.S. 920 (1976) (solicitation for prostitution does no more than propose a commercial transaction and is not entitled to immunity under the First Amendment); *Eissa v. United States*, 485 A.2d 610, 612 (D.C. 1984), *cert. denied*, 474 U.S. 1013 (1985) (rejecting argument of defendant who solicited sex for money from undercover police officer that soliciting prostitution statute is overly broad and infringes First Amendment rights); *Muse v. United States*, 522 A.2d 888, 890 (D.C. 1987) (same).

[13] *Cherry v. Koch*, 129 Misc. 2d 346, 356, 491 N.Y.S.2d 934 (Sup. Ct. 1985), *affirmed as modified*, 126 A.D.2d 346, 514 N.Y.S.2d 30, *appeal denied*, 70 N.Y.2d 603 (1987); *Lutz v. United States*, 434 A.2d 442, 445 (D.C. 1981); *Pennsylvania v. Dodge*, 287 Pa. Super. 148, 158–59, 429

free speech.[14] In *Illinois v. Braddock*,[15] the court held that the element of speech in the crime of Solicitation of a Sex Act was not constitutionally protected:

> [W]here speech is an integral part of unlawful conduct, it has no constitutional protection. Our legislature has determined that offering money or items of value in exchange for sex is unlawful conduct. Therefore, when defendant offered Officer Kramp $50 in exchange for sex, he was not engaged in a protected activity because he exercised his right to free speech in the commission of a criminal offense.

The court in *Missouri v. Roberts*,[16] similarly rejected the argument that the speech component of the statute prohibiting Prostitution was entitled to constitutional protection:

> [The statute] makes illegal not only the physical sexual act(s) but also the negotiations that assure the seller of the economic return expected for the performance of the physical act(s). Because the words uttered as an integral part of the prostitution transaction do not have a lawful objective, they are not entitled to constitutional protection.

A.2d 1143 (1981); *Delaware v. Hicks*, 360 A.2d 150, 152 (Super. Ct. 1976), *affirmed*, 373 A.2d 205 (1977).

[14] *New York v. Smith*, 44 N.Y.2d 613, 623, 378 N.E.2d 1032 (1978).

[15] 348 Ill. App. 3d 115, 120–21, 809 N.E.2d 712, 717 (2004) (citations and quotations omitted).

[16] 779 S.W.2d 576, 579 (Mo. 1989).

Washington courts also have rejected the argument that communication directed to the unlawful conduct of paying for sex is protected speech. In *State v. Carter*,[17] the court rejected an overbreadth challenge to the statute prohibiting Pimping and stated "we fail to see how speech directed towards persuading someone to enter into an illegal arrangement, *i.e.*, procuring a person for sexually immoral acts involving prostitution, involves constitutionally protected speech." The court reiterated in *State v. Cann*,[18] that "[s]peech directed toward the persuasion of another to enter into an illegal arrangement does not enjoy constitutional protection." *Cann* rejected an overbreadth challenge to the statute prohibiting advancing prostitution. The court in *Yakima v. Emmons*,[19] in rejecting an overbreadth challenge to a Prostitution ordinance, again stated that "we fail to see how speech directed

[17] 89 Wn.2d 236, 241, 570 P.2d 1218 (1977).
[18] 92 Wn.2d 193, 195–96, 595 P.2d 912 (1979).
[19] 25 Wn. App. 798, 801-02, 609 P.2d 973, *review denied*, 94 Wn.2d 1002 (1980).

toward persuading someone to enter into an illegal arrangement, *i.e.*, prostitution, involves constitutionally protected speech."[20]

Defendant acknowledges that speech directed toward soliciting a prostitute is not protected speech, but argues that Seattle's ordinance is not limited to "speech integral to criminal conduct."[21] The ordinance applies to a person who agrees to pay money for sex or who solicits or requests sex for money. This speech not only is integral to criminal conduct, it is the criminal conduct; the sex actually occurring is not an element of the crime.

Defendant certainly is correct that overbreadth challenges often have been rejected because the statute or ordinance includes an intent element, but none of the cases he relies on have held that an intent element is *necessary* to defeat an overbreadth challenge. In *Emmons*,[22] the court rejected an overbreadth challenge to a Prostitution ordinance that did not include any mental state element.

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[20] *See also Yakima v. Esqueda*, 26 Wn. App. 347, 349, 612 P.2d 821 (1980) (rejecting argument that Prostitution ordinance is unconstitutionally overbroad).

[21] *See* Appellant's Petition for Review, at 11.

[22] 25 Wn. App. at 801-02.

Indeed, the court noted that "[t]he mere act of offering to engage in sexual intercourse for a consideration is a violation of the law."[23]

To the extent that defendant criticizes the ordinance for not having an intent element, this Court repeatedly has stated that the legislature has the authority to create strict liability crimes that do not include a culpable mental state.[24] Statutes relating to prostitution quite often do not include a mental state element.[25] Defendant erroneously seems to imply[26] that Seattle's ordinance differs from state law – on the contrary, RCW 9A.88.110[27] does not expressly

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[23] *Emmons*, 25 Wn. App. at 801.

[24] *State v. Schmeling*, 191 Wn. App. 795, 801, 365 P.3d 202 (2015) (*citing State v. Bradshaw*, 152 Wn.2d 528, 532, 98 P.3d 1190 (2004)); *State v. Anderson*, 141 Wn.2d 357, 361, 5 P.3d 1247 (2000); *State v. Rivas*, 126 Wn.2d 443, 452, 896 P.2d 57 (1995).

[25] *See, e.g.*, RCW 9A.88.110(1) (Patronizing a Prostitute); RCW 9.68A.100(1) (Commercial Sexual Abuse of a Minor); *State v. Cashaw*, 4 Wn. App. 243, 251-52, 480 P.2d 528, *review denied*, 79 Wn.2d 1002 (1971) (crime of living with or accepting earnings of prostitute does not require that the defendant had knowledge of the woman's activities as a prostitute; statute not unconstitutionally overbroad or vague).

[26] *See* Appellant's Petition for Review, at 9.

[27] RCW 9A.88.110(1) provides:

A person is guilty of patronizing a prostitute if:

(a) Pursuant to a prior understanding, he or she pays a fee to another person as compensation for such person or a third person having engaged in sexual conduct with him or her; or

(b) He or she pays or agrees to pay a fee to another person pursuant to an understanding that in return therefor such person will engage in sexual conduct with him or her; or

include any mental state element and no case has ever suggested that the statute includes an implied mental state element. The operative language of Seattle's ordinance is exactly the same as state law.

Seattle's ordinance does include a provision expressly stating that no mental state element is required.[28] The reason for this provision is that another provision of Seattle's criminal code requires a mental state element unless one is expressly disavowed.[29] State law does not include a statute similar to this latter provision; thus, the former provision is unnecessary in the statute defining Patronizing a Prostitute under state law. Seattle's ordinance simply makes explicit what is implicit under state law.

(c) He or she solicits or requests another person to engage in sexual conduct with him or her in return for a fee.

[28] Seattle Municipal Code 12A.10.040.C provides:

As authorized by Section 12A.04.100, liability for sexual exploitation does not require proof of any of the mental states described in Section 12A.04.030 [defining intent, knowledge, recklessness and criminal negligence].

[29] Seattle Municipal Code 12A.04.100 provides:

Where an ordinance defining an offense does not clearly indicate a legislative intent to impose absolute liability, it should be construed as defining an offense requiring one of the mental states described in Section 12A.04.030. This section applies to all offenses defined by the ordinances of this City except those in Chapter 11.56 Seattle Municipal Code [defining serious traffic offenses].

That a defendant's culpability for agreeing to engage in sex for money does not require criminal intent is made perfectly clear by *Yakima v. Esqueda*,[30] which involved a male transsexual defendant agreeing to engage in "straight sex" with a male undercover police officer for $150. Notwithstanding that the agreed-to sexual conduct was impossible, and thus could not have been the defendant's intent, he nevertheless was convicted of Prostitution and his conviction nevertheless was affirmed on appeal. The court stated:

> We find nothing objectionable in making it a crime to agree to engage in an act of sexual conduct even though one of the parties may be physically incapable or mentally indisposed to fulfill the agreement. . . . Immunity should not extend to the male defendant because he was unable to fulfill the agreement, anymore than it should extend to a woman who is able but had no intention of doing so.[31]

Defendant did, of course, act consciously in agreeing to pay Detective Case $80 for sex. He told her that wanted a half-hour with one girl for just sex and agreed to pay $80.[32] He not only agreed to pay the $80, he actually handed over the cash. Nothing in the encounter suggested that defendant was kidding the officer or

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[30] 26 Wn. App. at 348.
[31] *Esqueda*, 26 Wn. App. at 349-50.

making some sort of joke or was confused about the nature of the conversation. His extensive text messages to the officer rather strongly suggest that he knew exactly what he was looking for. He did not make these statements or send these text messages or appear at the condominium building by accident or involuntarily. If defendant had wanted to argue a lack of conscious action, *i.e.*, that he was sleep-walking or sleep-talking or sleep-texting, such a claim would properly have been treated as an affirmative defense for which he would have the burden of proof.[33] Instead, defendant's primary argument was that Detective Case's testimony was not corroborated and the evidence was insufficient.[34]

The federal cases upon which defendant relies involve significantly different types of speech. Defendant's reliance on language in *New York v. Ferber*[35] is misplaced as the court was developing a test for child pornography distinct from that for obscenity. In its overbreadth analysis, the court in *Ferber* said not a

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[32] CP 331, 332-33, 337, 358 & 361.

[33] *See State v. Deer*, 175 Wn.2d 725, 733, 287 P.3d 539 (2012), *cert. denied*, 568 U.S. 1148 (2013) (State not required to prove defendant was awake during act of Child Rape, a strict liability crime).

[34] *See* CP 460-65.

[35] 458 U.S. at 765.

single word about scienter.[36] Defendant's reliance on *Virginia v. Black*,[37] shows that he misapprehends the category of speech directed toward and an integral part of unlawful conduct. In *Black*, the speech aspect of the statute was the cross-burning, which sometimes, but certainly not always, was directed toward the unlawful conduct of intimidation.[38] Thus, the defendant's intent determined whether the cross-burning could be proscribed. For Sexual Exploitation, on the other hand, the speech is always directed toward and is part of the unlawful conduct. *United States v. X-Citement Video, Inc.*[39] and *United States v. U.S. District Court for Central District of California, Los Angeles, California*[40] are statutory construction cases rather than ones involving speech directed toward and an integral part of criminal conduct.

The state cases upon which defendant relies also do not support his position. Like Seattle's ordinance, the prostitution

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[36] *See* 458 U.S. at 766-74.

[37] 538 U.S. 343, 123 S. Ct. 1536, 155 L. Ed. 2d 535 (2003).

[38] 538 U.S. at 360 (burning of a cross is symbolic expression) & 365 (a burning cross is not always intended to intimidate).

[39] 513 U.S. 64, 78, 115 S. Ct. 464, 130 L. Ed. 2d 372 (1994).

[40] 858 F.2d 534, 538 (9th Cir. 1988).

statute considered in *Oregon v. Huie*[41] did not expressly include any mental state element and was affected by another statute that required a mental state element unless one was expressly excluded. Unlike Seattle's ordinance, however, the Oregon statute did not expressly exclude a mental state element for Prostitution so the case seems not applicable to Seattle's ordinance. To the extent that Prostitution under Oregon law requires the parties to intend to perform the agreement of sex for money,[42] such is not the law in Washington.[43]

The statute addressed in *Ford v. Nevada* [44] did not concern sex for money, but, much like Washington's Promoting Prostitution statute,[45] inducing or compelling a person to become a prostitute. Thus, whether the defendant's speech induced or compelled the subject to become a prostitute or served some other purpose determined culpability. Again, for Sexual Exploitation, the speech is

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[41] 292 Or. 335, 337, 638 P.2d 480 (1982).
[42] *See Huie*, 292 Or. at 338.
[43] *See Esqueda*, 26 Wn. App. at 348-49.
[44] 127 Nev. 608, 613, 262 P.3d 1123 (2011).
[45] *See* RCW 9A.88.070.

the crime and always directed toward and is part of the unlawful conduct.

Even if Seattle's Sexual Exploitation ordinance prohibits constitutionally protected speech, its limited scope does not violate the constitution. The second step in an overbreadth analysis is to determine whether a statute that does reach constitutionally protected speech prohibits a "real and substantial" amount of protected conduct in contrast to the statute's plainly legitimate sweep.[46] Defendant has not shown a substantial amount of otherwise protected speech that the ordinance prohibits. As the court noted in *State v. Immelt*,[47] relied on by defendant, the mere fact that one can conceive of some impermissible applications of a statute is not sufficient to render it susceptible to an overbreadth challenge. The ordinance does not prohibit general discussions of prostitution or advocacy of prostitution. Rather, the ordinance regulates speech aimed at specific individuals who solicit other individuals for sex in

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[46] *Halstien*, 122 Wn.2d at 123.

[47] 173 Wn.2d 1, 11, 267 P.3d 305 (2011); *see also Members of City Council of City of Los Angeles v. Taxpayers for Vincent*, 466 U.S. 789, 800, 104 S. Ct. 2118, 80 L. Ed. 2d 772 (1984) (It is clear, however, that the mere fact that one can conceive of some impermissible

exchange for money. Defendant claims that Seattle's ordinance would apply to theatrical productions such as *Les Miserables*, Pretty woman and The Best Little Whorehouse in Texas,[48] but cites no specific dialogue in any production that includes an offer and agreement to pay money for sex. That a theatrical production or a movie involves prostitution or a character who is a prostitute hardly means that the particular actors are offering or agreeing to pay money for sex.

Defendant's claim that he was precluded from presenting testimony regarding his agreement to pay Detective Case $80 for sex or his understanding of what he was soliciting or agreeing to misrepresents the record.[49] During motions in limine, the trial court granted the City's motion to "preclude a [sic] defense from arguing that the defendant did not intend to commit this offense."[50] During trial, the trial court precluded defendant from offering inadmissible hearsay.[51] Defendant was not prevented from offering admissible

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applications of a statute is not sufficient to render it susceptible to an overbreadth challenge.

[48] *See* Appellant's Petition for Review, at 13.
[49] *See* Appellant's Petition for Review, at 15
[50] CP at 191.
[51] *See* CP at 401-07.

testimony that he did not solicit Detective Case for sex or that he did not agree to pay her $80 for sex or that he did not understand that the $80 he handed to her was for sex or that he did not understand English.

Rather than analogizing Seattle's Sexual Exploitation ordinance to laws prohibiting loitering,[52] horn-honking[53] or luring children out of a public place,[54] as defendant urges, this court should analyze this sex-for-money law similarly to the sex-for-money laws considered in *Carter*, *Cann* and *Emmons*. Seattle's Sexual Exploitation ordinance is not unconstitutionally overbroad.

F. CONCLUSION

Based on the foregoing argument, this Court should deny defendant's Petition for Review.

Respectfully submitted this 27th day of January, 2021.

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s/Richard Greene
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[52] *City of Tacoma v. Luvene*, 118 Wn.2d 826, 827 P.2d 1374 (1992); *Seattle v. Slack*, 113 Wn.2d 850, 784 P.2d 494 (1989).

[53] *Immelt*, 173 Wn.2d 1.

[54] *State v. Homan*, 191 Wn. App. 759, 364 P.3d 839 (2015).

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