SUPREME COURT NO. 94370-2
Court of Appeals NO. 73525-0-1

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

v.

STANLEY SCOTT SADLER,

Petitioner.

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

The Honorable Theresa Doyle, Judge

PETITION FOR REVIEW - AMENDED

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Petitioner, Stanley S. Sadler, asks this Court to accept review of the Court of Appeal's decision designated in Part B of this petition.

B. COURT OF APPEALS DECISION

Sadler seeks review of the Court of Appeals, Div. I, unpublished decision in State v. Sadler, No. 73525-0-1 (filed on March 27, 2017). A copy of this opinion is attached as Appendix A.

C. ISSUES PRESENTED FOR REVIEW

1. Actual Innocence

   a. Did the undercover detective's admissions to being a legal-age adult make it factually impossible for crimes dependent upon his portrayal of a minor to have been committed?

   b. Did Mr. Sadler's explicit identification of an adult engaging in 'age play' and ultimate refusal to engage in real life illegality further support the factual impossibility of committing these crimes?

2. Outrageous Police Conduct

   a. Did the appellate court fail to engage in a Lively analysis, as mandated by this Court, and err in labeling the conduct mere deceit?

   b. While portraying a fictitious minor, does it violate due process when the police initiate contact, suggest all illegality, misrepresent the law, make 18 solicitations over a 41-hour period, persist with a blown cover, subvert a person's refusals, admit to being an adult, and manipulate First Amendment protected fantasy (age play) to create the 'appearance' of illegality?

3. First Amendment Protected Speech (as-applied)

a. Did the Court of Appeals err by not addressing the First Amendment issues of insufficiency, vagueness, and overbreadth within the proper analyses claimed?

b. When explicitly identified as fantasy DURING the Internet communications, is fantasizing about illegality a crime, or is it speech that is protected under the First Amendment?

c. When confronted with evidence of a fraudulent online identity or an abusive exercise of police power, does a citizen have a right to inquire, seek the truth, and expose the perpetrator?

D. STATEMENT OF THE CASE

Mr. Sadler openly embraces that he engaged in a raunchy, sexually explicit conversation, on an adult-only website known for role play, with a person whom he had repeatedly and correctly identified as being an ADULT 'age player' (a legal-age person pretending to be a minor for fantasy fun) (see SAG p. 7-8).

The detective WAS an adult 'age player', admitted to being a legal-age adult (18), and provided Mr. Sadler with an overwhelming factual basis to make this determination of belief (SAG p. 3-6).

These two statements are supported by copious evidence from within the undisputed record. (SAG 1-8). They also encapsulate the seven issues Sadler raised within his SAG. He addresses the first three of those here in his Petition for Review. The questions are simple, but the legal issues are extremely complex. They raise constitutional questions that the Courts have

rarely, if at all, had a factual basis to address in an as-applied analysis. And unfortunately, the Court of Appeals applied the incorrect standards or ignored the core questions altogether.

As Sadler's SAG already makes detailed references to the undisputed record, they will not be repeated in this section. By necessity, some are brought into the arguments below as needed. This is especially true of the "Actual Innocence" claim. If this Court finds the Mr. Sadler is factually innocent, or that that the detective's conduct was constitutionally intolerable, or that Mr. Sadler engaged his First Amendment rights DURING the communications, then the rest of the 'story' becomes a red herring anyway.

Mr. Sadler is not an attorney. He has little legal training and respectfully asks the honorable Court to keep an open mind and consider that they will not likely encounter the factual and constitutional opportunities presented again, regardless of his inelegance in presenting them.

E. ARGUMENT WHY REVIEW SHOULD BE ACCEPTED

Review should be granted because (3) significant questions of law under the U.S. and WA State Constitutions are raised (RAP 13.4(b)(3)). The claims of actual innocence, outrageous police conduct within an Internet sting, and the First Amendment protection of a citizen's right to engage in fantasy and truth-seeking are issues of great importance to our Internet-based society

(RAP 13.4(b)(4)). It is respectfully asserted that the appellate court failed to follow the mandates of this Court on issues #2 and #3 (RAP 13.4(b)(1)).

1. ACTUAL INNOCENCE

Mr. Sadler is innocent. He asserts that when Det. Holand admitted to being a legal-age adult - it became factually impossible for crimes dependent upon the detective's portrayal of a minor to have been committed.

Procedural Background

As presented to the jury, the crimes of "Communication with a minor for immoral purposes" (9.68A.090) and 'attempted' Commercial Sex Abuse of a Minor" (9.68A.100) both require that Mr. Sadler 'believed' or had the 'belief' in a minor (see jury instructions 9, 15, 19, 20 – CP Sub #74). CSAM also required the conjunction of an agreement, intent, and substantial step (see jury instructions 9, 10, 11, 12, 15 – CP Sub #74).

Within his SAG, Sadler made a free-standing claim of actual innocence based upon the core elements of the crimes being factually impossible (SAG - Ground #1 – pg. 9). He pointed out that while the WA and United States Supreme Courts have not yet explicitly adopted a free-standing claim of actual innocence, both courts have left the possibility open. *In re Personal Restraint of Weber*, 175 Wn.2d 247, 284 P.3d 734, 741 (2012); *Herrera v. Collins*, 506 U.S. 390, 417, 113 S.Ct. 853, 122 L.Ed.2d 203 (1993).

The Court of Appeals summarily rejected the claim by reasoning that "Washington has not adopted the doctrine" (Appendix A – p. 15). The issue, which is factual by nature, is passed to this Court below.

Argument

It is undisputed that Det. Holand admitted to being a legal-age adult. Sadler asserts that this admission makes it *factually impossible* for crimes dependent upon the detective's successful portrayal of a minor to have been committed. Holand crossed this line to subvert Sadler's refusal to engage in additional dialog without a clear declaration that the person was a legal-age adult (18) and engaging in 'age play'. Holand was, by definition and in reality, an adult engaged in 'age play'. The relevant dialog follows:

"It's not a matter of trust, Jen. It's the law as you stated so clearly. If you're 15 my whole life is in jeopardy, and as much as I'm super attracted to you... I can't risk it. If you're just pushing the ageplay... and declare to me that you're 18... it's all good. I believe you. You look 18 in your pics. I appreciate you pushing the ageplay for me, but you need to declare you're 18 for me and that the rest is just ageplay. It's that simple. Then we're on totally. If you can't... I'm sorry. Up to you." (SE #5 7/4/14 at 12:35pm)

Holand then attempted to undermine Sadler's refusal by 'offering to lie'. When Sadler rejected this, the detective completely abandoned his cover:

"I'm consenting and 18 (u have what u want)"
(SE #5 – 7/4/14 at 1:02pm)

When Sadler also refused to pay for sex, Holand responded:

"... I send u an email that I'm consenting and 18 and u still want more. Its bullshit..." (SE #5 – 7/4/14 at 1:36pm – partial text)

In addition, the detective made a public declaration of being above 18 years of age upon entering the Craigslist personal ads:

"By clicking the link below you confirm that you are 18 or older and understand personals may include adult content"
(see SE #3 – "casual encounters >>> "m4w" entry point)

Mr. Sadler would add that the Court of Appeals incorrectly framed the above dialog in its recitation of the facts (Appendix A – p.2). He did not ask Det. Holand to simply "say" or "type" that he was eighteen. He demanded a clear declaration that Holand *was* 18 (a legal-age adult and the minimum age allowed on Craigslist). Holand abandoned his cover to keep Sadler engaged, even after Sadler had refused illegality.

Other Relevant Information

Sadler's factual innocence is further supported by the fact that he repeatedly identified the detective as being a legal-age adult engaged in 'age play' DURING the email communications. He did this in explicit terms synonymous with adulthood and online fantasy, such as "adult", "18", "18+", "age player", "woman", and "haven't believed you were really 15 at any time". In total, there are approximately 25 instances where these terms are used during the email communications (see SAG p.7-8). These are precise descriptions of factual and/or legal reality which further support a claim of actual Innocence.

In his closing email statement to the detective, Sadler left no room for doubt about his belief in an adult or refusal of real life illegality:

> **"So I am NOT agreeing to have sex. Or PAY for sex. Especially with someone underage. I am NOT going to break any laws. I have never been with an underage person. You contacted me on an 18+ only website where I was looking for 'young'... but obviously that meant 18ish+ given the requirements of Craigslist and my own adult post. I haven't believed you were really 15 at any time or I wouldn't have continued contact. You act, type, and communicate at an adult level. You even look older (18+ and absolutely beautiful) in your pics. I'm *very* attracted to the *woman* that contacted me... yes... as an adult... and so I will agree to meet with you... and we can talk."**
> (SE #5 – 7/5/14 at 11.41am)

Det. Holand responded by confirming Sadler's refusal of illegality:

"I just got your email about not wanting sex. So I guess we are off. I will turn around" (SE #5 – 7/5/14 at 11:44am)

"I don't know why u keep playing games. I am ready for what we talked about in the room. U basically have said thats not going to happen. But if all ur going to do is show up, see I'm who I told u I was and then leave me then it doesn't make sense for me to come."
(SE #5 – 7/5/14 at 11:51am)

Officer Suedel, the undercover voice, also testified Sadler did **not** believe she was a real person (RP 3/3/15 p.41 ln 3-5, p.42 ln 1-2, p.44 ln 24-25).

The State made no claim that there was any further mention of a minor, money, or illegality by Sadler or the police. The online dialog ended with Sadler ONLY agreeing to meet an ADULT with no illegality involved, and yet he was still arrested. Mr. Sadler freely gave a post-Miranda statement where he identified the undercover officer as being "Minimum, 22, probably

26 years old" (RP 3/4/15 p.102, 134, SE #7). At trial eight months later, Officer Suedel testified that she was 27 years old (RP 3/3/15 p.42).

A second consideration of Sadler's factual innocence relates to the crime of 'attempted CSAM'. As referenced above, and prior to any substantial step being taken (meeting), Sadler emphatically refused sex, money, or illegality of any type. It is factually impossible for a crime requiring the conjunction of an agreement, intent, and substantial step to have been committed under this refusal (see jury instructions 9, 10, 11, 12, 15 – CP Sub #74).

In addition, the relevance of the First Amendment's protection of fantasy and truth-seeking should be considered in resolving Mr. Sadler's actual innocence. If the speech is identifiable as protected fantasy, no crimes were possible, and Mr. Sadler's convictions were based solely upon the detective creating the false 'appearance' of illegality (see SAG p.21 or Issue #3 below)

In conclusion, Mr. Sadler asserts that the detective's admission negates the core element of both crimes, creating factual impossibility and actual innocence. This single undisputed fact, coupled with voluminous supporting evidence, provides this Court with a clear and convincing path to actual innocence and the correction of a manifest miscarriage of justice.

The Court should accept review on this issue as it involves significant questions of law under the U.S. and WA State Constitutions (Article 1 §3,

U.S. Const. amends. V, XIII, XIV) and the public has a substantial interest in the outcome. (RAP 13.4(b)(3)(4)).

2. OUTRAGEOUS POLICE CONDUCT

The Court of Appeals erred when it failed to engage in the analysis mandated by the WA Supreme Court in *State v. Lively*, 130 Wn.2d 1, 22, 921 P.2d 1036 (1996); *United States v. Black*, 733 F.3d 294 (9th Cir. 2013).

In its unpublished decision, the court stated that "[w]e reject Sadler's argument because he points to no egregious police conduct" (Appendix A – pg. 16). The court of appeals was mistaken.

In his SAG, Sadler relied on the *Lively* analysis and the undisputed record to detail an exhaustive list of outrageous police conduct (**see SAG p.12-20**). Sadler demonstrated that the police:

- had no knowledge of ongoing criminal activity
- targeted Sadler without reasonable suspicion
- instigated the crime
- initiated all contacts
- solicited all illegality
- persisted with **18** solicitations over a broken 41-hour period
- misrepresented the relevant law and age requirement
- were exposed using pictures of adult women (some from porn)
- intentionally used the wrong age on his email account (16 – above age of consent and legal to discuss sex) for over 1 year
- ignored Sadler's repeated identifications of an adult
- admitted to being of a legal-age adult

- ignored repeatedly blowing his cover
- ignored or subverted multiple refusals of illegality
- ignored Sadler's repeated identification of fantasy 'age play'
- created the 'appearance' of illegality by manipulating First Amendment protected fantasy
- withheld the above information from the other officers
- cleansed all police reports and affidavits of the above conduct
- represented this conduct to the jury as typical of Internet stings

Sadler pointed out that the use of such constitutionally intolerable tactics equates to the literal 'framing' of an innocent citizen (SAG p.17). Inexplicably, the court of appeals justified the police conduct as "mere deception" (Appendix A - p. 16). If left uncorrected, this path becomes the slipperiest of slopes.

In Lively, the WA Supreme Court mandated that "*The court should evaluate the State's conduct based upon the totality of the circumstances.* Lively, 130 wn.2d at 21. While the court of appeals briefly cited Lively, it simply did not apply the Lively factors to define the outrageous conduct.

Proper analysis of Mr. Sadler's case is doubly important as he asserts that the police engaged in the unconstitutional manipulation of his First Amendment rights to engage in fantasy and truth-seeking (SAG p.12).

In summary, review should be accepted because the court of appeals failed to perform the due process analysis mandated by this Court (RAP 13.4(b)(1)). These are significant questions of law involving the U.S. and

WA Constitutions (Article 1 §3, U.S. Const. amends. I, V, XIV) and the public has a substantial interest in the outcome. (RAP 13.4(b)(1)(3)(4)).

3. FIRST AMENDMENT PROTECTED SPEECH (**AS-APPLIED**)

a. The Court of Appeals erred by not addressing the First Amendment and Article 1 § 5 issues of vagueness, overbreadth, and insufficiency within proper as-applied and/or free speech related contexts.

In originally raising these issues within his SAG, Sadler repeatedly emphasized that his claims were made "as-applied" (SAG p. 21, 29, 31).

He carefully documented that the undisputed record contained abundant evidence, from DURING the communications, that explicitly identifies the speech as constitutionally protected fantasy (age play) (SAG p. 22-23). This case is not about vague assertions or after-the-fact facial claims. There are 25 instances where Sadler correctly identifies the speech as being with an adult and/or engaging in fantasy (see SAG p.7-8). In five of these instances he explicitly identifies the communications as 'AGE PLAY', which is a precise description of factual reality (SAG p.7(a)(d)(i)). The detective's admissions to being of legal-age should make this assertion immutable (SE #5 – 7/4/14 at 1:02pm & 7/4/14 at 1:36pm).

Sadler then establishes that it is well settled that sexual fantasy and Internet communications are constitutionally protected under the First Amendment *Jacobson v. United States*, 503 US 540, 551-52, 112 S.Ct. 1535,

118 L.Ed.2d 174 (1992); *Stanley v. Georgia*, 394 US 557, 565, 89 S.CT. 1243, 22 L.Ed.2d 542 (1969); *Reno v. ACLU*, 521 US 844, 870, 117 S.Ct. 2329, 138 L.Ed.2d 874 (1997). (see SAG p. 24).

In searching for a case that was directly on point, Mr. Sadler found that WA has never addressed this specific situation within an as-applied, factually supported context. In fact, the ONLY case that appears to have addressed this is *United States v. Valle*, 807 F.3d 508 (2nd Cir 2015). Here, the court was faced with even more extreme online fantasy (speech) that involved fantasizing about committing horrendous crimes with real victims. In summarizing the Second Circuits findings, it concluded that "Fantasizing about committing a crime, even a crime of violence against a real person whom you know, is not a crime." Id. at 511. The Ninth Circuit has also noted that, "Fantasy is not reality… The link between fantasy and intent is too tenuous to be probative." *United States v. Curtain*, 489 F.3d 935, 961 (2007) (en banc) (Kleinfeld, J., concurring) (omission in original). (see SAG p. 24).

Mr. Sadler next demonstrated how online Internet role play, including 'age play', is indistinguishable from the constitutionally protected movies, art, and literature that have explored that same taboo topics throughout history (SAG p. 24-25). This is common sense and a daily occurrence on TV.

He also cited landmark cases that define how protected speech can be indistinguishable from the unprotected speech integral to criminal conduct. (SAG p. 26-27). This included addressing the protection of simulated child pornography using young looking actors, which is *virtually identical* to the 'age play' and speech being addressed here. See: *Ashcroft v. Free Speech Coalition*, 535 US 234, 281-82, 122 S.Ct. 1389, 152 L.Ed.2d 403 (2002) (Protected speech does not become unprotected merely because it resembles the latter. The Constitution requires the reverse). Nor is this is an isolated concept. See e.g., *State v. Schaler*, 169 Wn.2d 274, 236 P.3d 858 (2010) (distinguishing a 'true threat' from 'jokes, idle talk, or hyperbole'); *Virginia v. Black*, 538 US 343, 155 L.Ed.2d 535, 123 S.Ct. 1536 (2003) (distinguishing cross burning 'with intent to intimidate' from the 'symbolic or ideological').

This is the danger to the First Amendment and crux of the present case. Age play is a common form of online fantasy speech that involves a topic that portrays illegality, and the whole point to online role play is to act out the fantasy *realistically*. This type of protected speech is especially vulnerable to an unethical uncover officer who is willing to manipulate and guide the interaction to create the 'appearance' of a crime.

A second aspect of Sadler's First Amendment claim is that he very clearly investigated, sought the truth, and came to an informed conclusion.

The First Amendment is founded on these principles, and Sadler asserts that they apply to his right to confront and expose an online fraudulent identity, even he exposes an abusive police sting in the process (SAG p.27).

The above authority was used to lay the foundation to Sadler's claims of vagueness, overbreadth, and insufficiency. (SAG p. 29-31).

Vagueness (as-applied)

When the court of appeals addressed the claim of vagueness, it stated that Sadler provided no argument that the term 'believe' could have any other meaning, or that the statute invites arbitrary enforcement (Appendix A p. 17). This position is misplaced, and the court failed to address the (as-applied) First Amendment claims in any way.

Sadler clearly asserted that the terms "believed" and "belief", as presented to the jury and undefined, were unconstitutionally vague in that "they allowed the conviction to be based on the mere 'appearance of belief' which is inherent to First Amendment protected fantasy ('age play')" (SAG p. 29). This is not a matter of jury determination, it requires inquiry into whether there is contextual or discernible evidence of protected speech. He related this as analogous to the way this court has separated a "true threat" from the indistinguishable but protected speech of "jokes, idle talk, or hyperbole." *Schaler*, 169 Wn.2d at 283.

The second prong of the vagueness challenge encompassed the claim that the statutes (as-applied) allowed the police to engage in arbitrary, ad hoc, and discriminatory enforcement by subjectively misrepresenting and criminalizing First Amendment protected 'age play' and the right to seek the truth. Neither of these issues were properly addressed.

Overbreadth (as-applied)

The appellate court viewed Sadler's overbreadth claim as founded upon the assertion that he believed 'Jen' to be an adult, and then dismissed the claim based on the jury determining otherwise. (Appendix A –p.17). The court stated that Sadler's argument failed because the speech was not constitutionally protected. Id. The court's error was again in ignoring that the claim was made "as-applied" (SAG p. 31). This is clearly evidenced by the *facial* authority cited by the court: *City of Seattle v. Webster*, 115 Wn.2d 635, 639, 802 P.2d 1333 (1990) ("Facts are not essential for consideration of a facial challenge to a statute or ordinance on First Amendment grounds. Constitutional analysis is made upon the language of the ordinance or statute itself.). Again, this issue was not properly addressed.

Insufficiency of the evidence - First Amendment claim

The court of appeals improperly applied the general sufficiency of the evidence analysis to a First Amendment claim (Appendix A p. 18). It gave

footnote attention to rejecting the First Amendment claim, but again Mr. Sadler would assert the court improperly relied on *Webster*. Id.

Under this claim, Sadler clearly asked the court to consider the sufficiency of the evidence under a First Amendment analysis analogous to that used in *State v. E.J.J.*, 183 Wn.2d 497, 503-504, 354 P.3d 815 (2015) ("Given the important First Amendment rights at stake, we are required to engage in a careful review of the record to ensure that E.J.J.'s conviction *could not* have been based on speech alone"); see also: *State v. Kilburn*, 151 Wn.2d 36, 42, 84 P.3d 1215 (2004); *Street v. New York*, 394 US 576, 594, 89 S.Ct. 1354, 22 L.Ed.2d 572 (1969) ("we are unable to sustain a conviction that may have rested on a form of expression, however distasteful, which the constitution tolerates and protects.") (SAG p.32-33).

In summary, fantasizing about a crime – is NOT a crime. It is constitutionally protected speech. The court should have engaged in a careful review of the relevant facts supporting these First Amendment claims. Such an analysis would have clearly revealed the speech to be protected. There is no ambiguity in the plethora of supportive evidence in this case. This is especially true where the detective himself admitted to being an adult.

F. CONCLUSION

The decision of the Court of Appeals conflicts with well-established established decisions of this Court (RAP 13.4 (b)(1). The issues are

significant questions of law under the WA and US Constitutions and of substantial interest to the public (RAP 13.4 (b)(3)(4). Mr. Sadler respectfully asks this Court to grant review.

DATED this 31st day of May, 2017.

Respectfully submitted,

STANLEY S. SADLER
Petitioner, pro se

APPENDIX A

IN THE COURT OF APPEALS FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON,	)	
	)	No. 73525-0-I
Respondent,	)	
	)	DIVISION ONE
v.	)	
	)	
STANLEY S. SADLER,	)	UNPUBLISHED OPINION
	)	
Appellant.	)	FILED: March 27, 2017

SPEARMAN, J. — Stanley Sadler challenges his conviction of one count of attempted commercial sexual abuse of a minor and one count of communication with a minor for immoral purposes. He argues that the trial court erred in redacting email chains, admitting opinion testimony, calculating his sentence, and imposing unconstitutional conditions of custody. Additionally, he argues that the prosecutor committed flagrant misconduct during closing argument. Sadler raises several further arguments in a statement of additional grounds. Finding no error, we affirm.

FACTS

Stanley Sadler posted a sexually explicit ad on Craigslist seeking a young female for a sexual liaison. Vice Detective Tye Holand of the Seattle Police

Department responded to Sadler's ad because of its references to youth. Holand posed as a fifteen-year-old prostitute named "Jen."

Jen and Sadler exchanged emails. Jen repeatedly stated that she was fifteen. Sadler sometimes said he did not believe Jen was fifteen and asked her to say she was eighteen. Sadler and Jen also talked on the phone.[1] Sadler told Jen that because of her age, they could both be in a lot of trouble.

After further email communication, Sadler proposed the details of their meeting. He told Jen that he would not pay for sex but would give her $150 as a gift. Sadler asked Jen to type that she was eighteen. Jen replied that she was fifteen. After several emails, Jen sent another email that stated she was "'consenting and 18. You have what you want[.]'" Verbatim Report of Proceedings (VRP) (03/02/15) at 74.

The next morning Jen called Sadler and reminded him that she was only fifteen. After the call, Sadler emailed Jen and said he was not agreeing to have sex with a minor. He said that he only continued to communicate with her because he believed she was over eighteen and that he was only meeting her so they could talk. Jen responded that she did not want Sadler to waste her time. Sadler replied that he was on his way.

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[1] Jami Suedel, a twenty-six year old female police officer, pretended to be Jen in phone conversations.

A few minutes later Sadler arrived at the meeting place and was arrested. In a search incident to arrest, officers found $216 cash. Sadler was charged with attempted commercial sexual abuse of a minor and communicating with a minor for immoral purposes.[2]

At trial, Sadler argued that he was not guilty because he never believed Jen was a minor. He contended that he engaged in a lawful role-playing game with an adult who was pretending to be a minor. Sadler sought to admit email chains with other women. He argued that the emails demonstrated that he was seeking a long-term sexual relationship with a consenting adult and that he knew there were many "pretenders and scammers" on Craigslist. VRP (03/03/15) at 129.

The trial court admitted nine of the email chains with no redaction, redacted six email chains, and ruled two inadmissible. A jury convicted Sadler of both charges. Sadler appeals.

DISCUSSION

Redacted Emails

Sadler sought to admit seventeen email exchanges between himself and various women who responded to his ads. The ads had subject lines like "Attractive 50ish seeks petite 18ish – move in & leave the rest behind" and "Mature 50ish looking for young 18ish ... unprotected and fertile." Clerk's Papers

[2] Sadler was also charged with tampering with evidence. He was acquitted on this charge and it is not at issue in this appeal.

(CP) at 233. In some of the exchanges, Sadler's correspondent identified herself as a woman in her 20s, 30s, or 40s. Sadler argued that the emails were relevant because they demonstrated that his exchanges with Jen were part of a general scheme to seek a long-term sexual relationship with a consenting adult. He asserted that they also served to rebut the State's suggestion that "he was using the Internet to troll for underage sexual partners." Brief of Appellant at 24. Sadler also contended that the emails showed that because he knew there were many "scammers" on Craigslist, any agreement with Jen was contingent on confirming that she was an adult. VRP (03/03/15) at 128.

The trial court admitted those portions of the emails showing that Sadler communicated with women who identified themselves as adults and his knowledge of internet scams. The trial court redacted as irrelevant those portions in which Sadler expressed his desire to have a long-term relationship and father a child, described his background, and detailed anticipated sexual encounters. In response to Sadler's argument that the emails were relevant as context, the court found that any relevance was outweighed by the passages' cumulative nature and their tendency to confuse the jury.

We review a trial court's evidentiary rulings for abuse of discretion. State v. Brockob, 159 Wn.2d 311, 348-49, 150 P.3d 59 (2006) (citing State v. Vreen, 143 Wn.2d 923, 932, 26 P.3d 236 (2001)). We will not disturb the trial court's decision absent a clear showing that it was manifestly unreasonable or exercised

on untenable grounds. State v. Rohrich, 149 Wn.2d 647, 654, 71 P.3d 638 (2003).

Evidence is generally admissible if it is relevant. ER 402. Evidence is relevant if it has any tendency to make the existence of any consequential fact more or less probable than it would be without the evidence. ER 401. The trial court has discretion to determine whether evidence is relevant. Brockob, 159 Wn.2d at 348 (citing Vreen, 143 Wn.2d at 932). Relevant evidence may be excluded if its probative value is substantially outweighed by the danger that it will be cumulative or confusing. ER 403.

Here, the trial court found relevant and admitted emails that showed Sadler's interest in relationships with adult women. But it excluded as irrelevant email passages regarding Sadler's purported interest in a long-term relationship and possibly being a father or that involved his self-descriptions or proposed sexual activities. Because the redacted passages do not make it more or less probable that Sadler believed Jen was a minor, intended to have sex with her, or intended to pay her for sex, we conclude that the trial court did not abuse its discretion in determining that the passages were irrelevant. And even if relevant, we agree with the trial court that the excluded passages were cumulative. Several ads admitted into evidence, including the one Holand responded to, expressed Sadler's interest in a sexual partner who was willing to live with him and have a child. The trial court's decision is not manifestly unreasonable or based on untenable grounds. There was no error.

However, Sadler asserts that, by not admitting portions of the email chains, the trial court violated his constitutional right to present a defense. Criminal defendants have a due process right to present a defense. State v. Jones, 168 Wn.2d 713, 720, 230 P.3d 576 (2010) (citing State v. Darden, 145 Wn.2d 612, 622, 41 P.3d 1189 (2002)). The right to present a defense includes the right to present relevant evidence. Id.

Relying on Jones, Sadler contends that exclusion of redacted portions of the emails prevented him from arguing his theory of the case. But his reliance is misplaced. In Jones, the defendant was charged with rape and the trial court excluded his testimony that the alleged victim consented to sexual intercourse. The Supreme Court reversed his conviction because the testimony was relevant to the charged crime and, if believed, constituted a complete defense. Jones, 168 Wn.2d at 721. In this case, however, the excluded evidence was not relevant to any element of the charged crimes. That Sadler wanted a long term relationship or to father a child has no bearing on whether he believed Jen was an adult. Additionally, here, Sadler testified at length to his theory of the case and supported that theory by reference to the admitted emails. We reject Sadler's claim that the trial court violated his right to present a defense by redacting the email chains.

Sadler next contends that the redacted passages were necessary to corroborate his testimony that he was seeking a long-term relationship with an adult. He argues that because his credibility was under attack, the trial court's

refusal to admit corroborating evidence was error. In particular, he cites the State's argument on rebuttal comparing Sadler's claim that he was looking for a long term relationship on Craigslist to "saying you're looking at Playboy for the articles. It's not reality." VRP (3/9/15) at 95-96. The argument is unpersuasive because Sadler himself undercut the claim in his own testimony. When asked about the nature of the relationship he sought, Sadler testified "I'm not limited to the long-term monogamous relationship, but casual encounters, I'm open to that, also." VRP (3/5/15) at 79. He also testified that he "might consider meeting [with a prostitute]." Id. at 84.

We conclude that Sadler's challenges to the redactions of the email chains are without merit.

Opinion Testimony

Sadler contends that the trial court erred in admitting improper opinion testimony. Generally, a witness may not offer an opinion as to the guilt of the defendant. State v. Demery, 144 Wn.2d 753, 759, 30 P.3d 1278 (2001) (citing City of Seattle v. Heatley, 70 Wn. App. 573, 577, 854 P.2d 658 (1993)). Opinion testimony is "'[t]estimony based on one's belief or idea rather than on direct knowledge of facts at issue.'" Id. at 760 (quoting Dubria v. Smith, 224 F.3d 995, 1486 (9th Cir. 2000).

In this case, Vice Detective Holand testified to his experience posing online as an underage prostitute. He stated that when he identifies himself as a minor, about half of his correspondents stop communicating. VRP (03/03/15) at

30. Holand testified that another set of correspondents "are kind of just playing a game. They'll communicate for a little while, they'll stop communicating, you won't hear from them." Id. The remaining correspondents continue communicating and Holand tries to set up a meeting with them. If the correspondent agrees to meet, Holand prepares to arrest him at the meeting place.

Sadler contends that this testimony was improper. He first asserts that when Holand testified that he only arrests people who continue to communicate and progress to an in-person meeting, he conveyed the opinion that Sadler was guilty. Sadler also contends that Holand's testimony referring to people "who are kind of just playing a game," was an improper opinion that Sadler fit the profile of a person engaged in unlawful activity. Sadler argues that the purported opinion undercut his claim that he was engaged in a lawful role-playing game with Jen. Br. of App. at 34.

These arguments are without merit. Holand testified to his experience in undercover work. He did not offer an opinion on Sadler's guilt. Holand explained that by describing some correspondents as "playing a game," he meant that they communicated for a time then stopped communicating. The testimony clearly did not refer to people engaged in role-playing games. We reject Sadler's argument that Holand's testimony amounted to an opinion on Sadler's guilt.

Prosecutorial Misconduct

Sadler next contends that the prosecutor committed flagrant misconduct by appealing to the jury's emotions and disparaging defense counsel, which deprived him of a fair trial. To prevail on a claim of prosecutorial misconduct, Sadler must establish that the prosecutor's conduct was improper and prejudicial. State v. Thorgerson, 172 Wn.2d 438, 442, 258 P.3d 43 (2011) (citing State v. Magers, 164 Wn.2d 174, 191, 189 P.3d 126 (2008)). Because Sadler did not object to the alleged misconduct at trial, any error is waived unless the misconduct was flagrant and caused prejudice that "'could not have been neutralized by an admonition to the jury.'" Id. (quoting State v. Russell, 125 Wn.2d 24, 86, 882 P.2d 747 (1994)).

"[A] prosecutor has wide latitude to argue reasonable inferences from the evidence." In re Glasmann, 175 Wn.2d 696, 704, 286 P.3d 673 (2012) (citing Thorgerson, 172 Wn.2d at 448). But the prosecutor may not "'use arguments calculated to inflame the passions or prejudices of the jury.'" Id. (quoting American Bar Association, Standards for Criminal Justice std. 3-5.8(c) (2d ed. 1980)). It is also improper for the prosecutor to disparage defense counsel. Thorgerson, 172 Wn.2d at 451 (citing State v. Warren, 165 Wn.2d 17, 29-30, 195 P.3d 940 (2008)). We review a prosecutor's comments in the context of the entire case. Id. (citing Russell, 125 Wn.2d at 86).

Sadler asserts that two of the prosecutor's statements improperly appealed to the jury's emotions. App. Br. at 36. We disagree. In closing argument, the State

summarized the evidence that Sadler was guilty of attempted sexual abuse of a minor. The prosecutor stated:

> Now, maybe you're thinking, but he didn't actually pay for anything. It doesn't matter. Even the completed crime doesn't require that you actually pay, just that you make that offer. And that's because the law is not going to stand by and wait until Mr. Sadler's actually having sex with a kid, before it's a crime.

VRP (03/09/15) at 62. The argument is not improper. The prosecutor merely explained the attempt element of the crime to the jury.

Sadler also argues that the prosecutor's comment regarding Sadler's reference to the television show To Catch a Predator was improper. In Sadler's emails to Jen, he described the show as "scary shit." VRP (03/05/15) at 10. At trial, Sadler testified that the show involved police officers posing as underage girls on the internet, who attempted to arrange a meeting with and then arrest the men who communicated with them. The prosecutor referred to these comments in rebuttal and argued:

> On that topic, why is To Catch a Predator so scary for Mr. Sadler? Did you listen to his answer when he was testifying? It sure didn't sound like he was saying it's scary because there's kids out there getting picked up, it was scary for the guys who get into it. If that doesn't worry you, it should.

Id. at 98-99.

The prosecutor argued a reasonable inference from the evidence. Sadler stated that the show was about catching men who were attempting to have sex with underage girls. A reasonable inference from his email was that the show was scary for men who used the internet to search for sexual relationships with

minors. It may be that the prosecutor acted improperly in telling the jury it should be worried by Sadler's attitude. But even if the comment was improper, any objection was waived because the error could have been cured by an instruction to the jury.

Sadler also argues that the prosecutor improperly disparaged defense counsel. In closing, the prosecutor stated that Sadler had prepared a story that purported to explain each fact, but he argued that Sadler's version of events was not credible. Sadler asserts that these arguments were improper because they depicted defense counsel as deceptive. But because the prosecutor did not question defense counsel's honesty or improperly disparage defense counsel, we reject Sadler's argument.

Cumulative Error

Next, Sadler contends that the accumulation of errors in this case require a new trial. Multiple errors may justify reversal even if the errors individually do not warrant reversal. State v. Coe, 101 Wn.2d 772, 789, 684 P.2d 668 (1984). But because Sadler has failed to establish any errors, the cumulative error doctrine does not apply.

Sentence Calculation

Sadler next argues that the trial court erred in calculating his sentence. He asserts that attempted sexual abuse of a minor and communication with a minor for immoral purposes constitute the same criminal conduct and should be treated as one for sentencing purposes. We disagree.

When the sentencing court determines that current offenses constitute the same criminal conduct, the offenses are treated as one crime. RCW 9.94A.589(1)(a). For convictions to constitute the same criminal conduct, the crimes must (1) require the same criminal intent; (2) occur at the same time and place; and (3) involve the same victim. Id. This court reviews the trial court's decision as to whether multiple offenses constitute the same criminal conduct for abuse of discretion. State v. Graciano, 176 Wn.2d 531, 540, 295 P.3d 219 (2013).

The two crimes charged in this case have different statutory intent elements. Attempted commercial sexual abuse of a minor requires the specific intent to enter into a sex-for-pay agreement with a minor. Communication with a minor for immoral purposes requires an "immoral purpose," or the intent to promote a minor's exposure to and involvement in sexual misconduct. The trial court did not err in ruling that Sadler's offenses did not share the same criminal intent. See State v. Chenoweth, 185 Wn.2d 218, 223, 370 P.3d 6 (2016) (holding that the crimes of rape of a child and incest had different criminal intents because the intent to have sex with a child is different than the intent to have sex with someone related to you).

However, Sadler contends that his intent did not change from one crime to the next and asserts that his offenses therefore shared the same intent. He relies primarily on State v. Tili, 139 Wn.2d 107, 123-24, 985 P.2d 365 (1999). But Tili is inapposite because that case concerns multiple counts of the same crime, not,

as here, two crimes with different statutory intent elements. Id. We reject Sadler's argument.

Conditions of Community Custody

Sadler next argues that the trial court imposed unconstitutional conditions of community custody. The sentencing court has authority to impose "crime-related prohibitions." RCW 9.94A.703(3)(f). A crime-related prohibition "prohibit[s] conduct that directly relates to the circumstances of the crime for which the offender has been convicted." RCW 9.94A.030(10). We review a trial court's imposition of crime-related conditions of community custody for abuse of discretion. State v. Irwin, 191 Wn. App. 644, 656, 364 P.3d 830 (2015) (citing State v. Cordero, 170 Wn. App. 351, 373, 284 P.3d 773 (2012)).

In this case, the sentencing court imposed several conditions of community custody, including:

> 4. [O]btain a sexual deviancy evaluation with a State certified therapist approved by your Community Corrections Officer (CCO) and follow through with all recommendations of the evaluator. Should sexual deviancy treatment be recommended, enter treatment and abide by all programming rules, regulations, and requirements....
>
> 5. Inform the supervising CCO and sexual deviancy treatment provider of any dating relationship. Disclose sex offender status prior to any sexual contact. Sexual contact in a relationship is prohibited until the treatment provider approves of such.
>
> . . . .
>
> 27. The defendant shall not visit any internet websites or chat rooms where escort or prostitution services are advertised or provided. No use of internet with[out] approval of treatment provider.

CP at 409-10. Sadler challenges conditions 5 and 27.

The challenged conditions concern Sadler's sexual contact and his use of the internet. The record contains a great deal of evidence connecting Sadler's crime to sexual contact and internet usage. The court also had before it the Department of Corrections' presentence report. The presentence report provides further details concerning Sadler's history of sexual deviancy and his history of using the internet to further this deviancy. We conclude that the trial court did not abuse its discretion in imposing the crime-related prohibitions on Sadler's sexual contact and internet usage.

But Sadler contends that the challenged conditions improperly prohibit constitutionally-protected conduct. The sentencing court may impose conditions that reach a defendant's constitutional rights provided those conditions are imposed sensitively. State v. Bahl, 164 Wn.2d 739, 757, 193 P.3d 768 (2008) (citing State v. Riley, 121 Wn.2d 22, 37, 846 P.2d 1365 (1993)). Limitations on constitutionally-protected conduct must be "narrowly tailored and directly related to the goals of protecting the public and promoting the defendant's rehabilitation." Id. Sadler argues that, in this case, the conditions are not narrowly tailored or sensitively imposed. He asserts that, because he is innocent, he is not amenable to treatment and will not have a treatment provider. He therefore argues that conditions 5 and 27 amount to total and unreasonable bans on internet usage and sexual contact.

Sadler's argument is without merit. Condition 4 requires Sadler to obtain a sexual deviancy evaluation and comply with treatment recommendations.

Compliance with this condition ensures that Sadler will have a treatment provider who could give approval for sexual contact and internet usage. The conditions are not total bans on protected activity. The sentencing court did not abuse its discretion in imposing the challenged conditions of custody.

Costs on Appeal

Finally, Sadler asks that no costs be awarded on appeal. In light of RAP 14.2, however, the request is properly heard by a commissioner of this court. When a trial court makes a finding of indigency, that finding remains throughout review "unless the commissioner or clerk determines by a preponderance of the evidence that the offender's financial circumstances have significantly improved since the last determination of indigency." RAP 14.2. Here, Sadler was found indigent by the trial court. If the State has evidence indicating that Sadler's financial circumstances have significantly improved since the trial court's finding, it may file a motion for costs with the commissioner.

Statement of Additional Grounds

Sadler raises seven grounds for relief in a statement of additional grounds (SAG). The core of Sadler's argument in each of these asserted grounds for relief is that he did not believe Jen was a minor.

Sadler first contends that the trial court erred because he is actually innocent. Some states have adopted an actual innocence doctrine, "in which innocence itself provides a basis for relief." In re Weber, 175 Wn.2d 247, 256, 284 P.3d 734 (2012) (citing Schlup v. Delo, 513 U.S. 298, 315, 115 S. Ct. 851,

130 L. Ed.2d 808 (1995)). Because Washington has not adopted the doctrine, we reject Sadler's claim. Id. at 262.

Sadler next argues that the police engaged in outrageous conduct that violated due process. The State's conduct may violate due process when it is "so shocking that it violates fundamental fairness." State v. Lively, 130 Wn.2d 1, 19, 921 P.2d 1035 (1996) (citing State v. Myers, 102 Wn.2d 548, 551, 689 P.2d 38 (1984)). Only egregious conduct supports such a claim. Id. Mere deception is not sufficient. Id. (citing United States v. Sneed, 34 F.3d 1570, 1577 (10th Cir. 1994)). We reject Sadler's argument because he points to no egregious police conduct. At most, Holand and Suedel deceived Sadler by their impersonation of a 15-year-old girl, but mere deception does not constitute outrageous conduct. Id. The email record shows only that Holand provided the opportunity for Sadler to commit a crime. He did not coerce Sadler or overcome Sadler's resistance to committing that crime.

Sadler also asserts that the police and the prosecutor destroyed the evidence of their purported outrageous conduct. He appears to rely on the fact that his phone conversations with Suedel (posing as Jen) were not recorded and because Suedel testified that she destroyed the notes she took during her call with Sadler after she finished writing her report. We reject the argument because we are aware of no authority, and Sadler cites none, which holds that this conduct is unlawful or outrageous.

Sadler contends that the statutes are unconstitutionally vague because they require proof that the defendant believed he was communicating with a minor, but they do not define "believe." SAG at 3. A statute is void for vagueness if (1) it does not define a criminal offense with sufficient clarity that ordinary people can understand what conduct is prohibited or if (2) it fails to provide ascertainable standards of guilt to protect against arbitrary enforcement. City of Spokane v. Douglass, 115 Wn.2d 171, 182-83, 795 P.2d 693 (1990) (citing Kolender v. Lawson, 461 U.S. 352, 357, 103 S. Ct. 1855, 75 L. Ed.2d 903 (1983)). The challenging party has the burden of proving vagueness beyond a reasonable doubt. Haley v. Medical Disciplinary Bd., 117 Wn.2d 720, 739, 818 P.2d 1062 (1991) (citing Seattle v. Eze, 111 Wn.2d 22, 26, 759 P.2d 366 (1988)). Sadler provides no argument that "believe" has any meaning other than its ordinary usage or that the statute as written, invites arbitrary enforcement. We reject this claim.

Next, Sadler contends that the statutes are overbroad because they criminalize constitutionally protected free speech. Sadler argues that because he believed Jen was an adult, he was engaging in protected speech. But the jury rejected his testimony on this issue. It found that Sadler believed he was communicating with a minor. Thus, Sadler's argument fails because communicating with a minor for immoral purposes or to solicit prostitution is not constitutionally protected speech. City of Seattle v. Webster, 115 Wn.2d 635,

648, 802 P.2d 1333 (1990) (citing Seattle v. Slack, 113 Wn.2d 850, 856, 784 P.2d 494 (1989)). Sadler's argument is without merit.

Sadler next argues that the evidence was insufficient to support his convictions. Sadler contends that the State failed to disprove his defense that he did not believe Jen was a minor and that insufficient evidence supports the conclusion that he believed Jen was a minor.[3] We reject these arguments.

The evidence is sufficient to support a criminal conviction if, viewing the evidence in the light most favorable to the State, a rational trier of fact could have found the elements of the crime beyond a reasonable doubt. State v. Joy, 121 Wn.2d 333, 338, 851 P.2d 654 (1993) (citing State v. Green, 94 Wn.2d 216, 221, 616 P.2d 628 (1980)). A challenge to the sufficiency of the evidence admits the truth of the State's evidence and all reasonable inferences that may be drawn therefrom. State v. Salinas, 119 Wn.2d 192, 201, 829 P.2d 1068 (1992).

In support of his arguments, Sadler relies on the emails in which he stated that Jen was eighteen, he knew she was just doing "age-play," he would not pay for sex, and he was meeting only to hang out. He also asserts that the emails from Jen were so contradictory that no reasonable person would have believed them. However, he ignores those emails in which Jen repeatedly stated that she was a minor as well as Suedel's and Holand's testimony that they told Sadler Jen

[3] Sadler also asserts that the sufficiency of the evidence must be reviewed under a heightened standard because his First Amendment rights are at stake. We reject this argument because, as we earlier discussed, communicating with a minor for immoral purposes or to solicit prostitution is not constitutionally protected speech. City of Seattle v. Webster, 115 Wn.2d at 648.

was fifteen. When this evidence is viewed in the light most favorable to the State and taken as true, a rational juror could have found that Sadler believed Jen was a minor.

Next, Sadler contends that the prosecutor committed flagrant misconduct. In addition to the arguments raised by counsel, Sadler asserts that the prosecutor presented a misleading summary of the evidence in opening argument and condoned Holand's deceptive conduct. To prevail on a misconduct claim, Sadler must establish that the prosecutor's conduct was improper and prejudicial. Thorgerson, 172 Wn.2d at 442 (citing Magers, 164 Wn.2d at 191). Because Sadler did not object to the alleged misconduct at trial, any error is waived unless the misconduct was flagrant and caused prejudice that "'could not have been neutralized by an admonition to the jury.'" Id. (quoting Russell, 125 Wn.2d at 86).

In opening argument, the prosecutor showed excerpts from Sadler's emails to Jen in a PowerPoint. Sadler correctly argues that the presentation was improper because the emails had not yet been admitted into evidence. However, because the entire email chain between Sadler and Jen was later admitted into evidence without objection, its premature display to the jury did not prejudice Sadler in any discernable way. We reject Sadler's argument.

Sadler also asserts that the PowerPoint was improper because it did not include the email in which Jen stated she was eighteen or emails in which Sadler referred to age-play. Sadler asserts that the prosecutor concealed exonerating

facts by not informing the jury that Jen stated that she was an adult. The entire email exchange was admitted as evidence and both Holand and Sadler testified to Jen's email stating that she was eighteen. We reject Sadler's argument as unfounded.

Sadler further contends that the PowerPoint constituted an unfair surprise because he could not see it during opening argument and so was unable to object. The claim is without merit. Because he was represented by counsel, Sadler had no authority to object to the PowerPoint display. And it does not appear from the record that his attorney was either surprised by the display or had any difficulty observing it.[4]

Finally, Sadler contends that he received ineffective assistance of counsel. To prevail on an ineffective assistance of counsel claim, a defendant must show that counsel's conduct was deficient and resulted in prejudice. State v. Humphries, 181 Wn.2d 708, 719-720, 336 P.3d 1121 (2014) (citing Strickland v. Washington, 466 U.S. 668, 687-88, 108 S. Ct. 2052, 80 L. Ed. 2d 674 (1984)). If either part of the test is not satisfied, the claim fails. State v. Hendrickson, 129 Wn.2d 61, 78, 917 P.2d 563 (1996)). Deficient performance is not shown by

[4] At trial, after the State's opening argument, defense counsel asked that accommodations be made so that Sadler could see the screen the State was using to publish exhibits. The trial court allowed Sadler to move in order to see the screen and provided him with paper copies of the exhibits. Sadler's counsel did not object that he was unable to see the presentation during opening argument.

matters that go to trial strategy of tactics. Id. at 77-78. Review of an attorney's performance is highly deferential. Strickland, 466 U.S. at 689.

Sadler asserts that he received ineffective assistance because counsel failed to adequately assert his innocence, argue that Sadler's conduct was protected by the First Amendment, investigate outrageous police conduct, and object to the prosecutor's opening statement. Sadler thus contends that counsel was deficient for failing to assert the arguments set out in his SAG. But as these arguments are without merit, counsel's failure to assert them was not deficient, but, instead, a legitimate trial strategy. We reject Sadler's claim.

Affirmed.

Spearman, J.

WE CONCUR:

Maar, J.

Dwyer, J.

STANLEY SADLER - FILING PRO SE

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Appellate Court Case Title:	State of Washington v. Stanley Scott Sadler
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Comments:

The "Petition for Review - Amended" is submitted to correct typographical errors. Those errors are itemized in the "Errata" also being filed. The "Declaration of Conformity to RAP 10.4" is being made at this Court's request

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