IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

THE PEOPLE OF THE STATE OF CALIFORNIA, Plaintiff and Respondent, v. JOMO ZAMBIA, Defendant and Appellant.	Crim. No. S173490 (Court of Appeal No. B207812 Sup. Ct. No. LA055997)

REPLY BRIEF ON THE MERITS

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Plaintiff and Respondent,	)	
	)	Crim. No. S173490
v.	)	
	)	(Court of Appeal No. B207812
	)	Sup. Ct. No. LA055997)
JOMO ZAMBIA,	)	
	)	
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This reply is limited to those points upon which further discussion may be helpful to the Court. (Cal. Rules of Court, rule 8.504.)

ARGUMENT

SOLICITATION OF A PROSTITUTE, OR SOMEONE BELIEVED TO BE A PROSTITUTE, TO "CHANGE MANAGEMENT" DOES NOT CONSTITUTE PANDERING BY ENCOURAGEMENT UNDER PENAL CODE SECTION 266i, SUBDIVISION (A)(2)

The primary statutory thesis put forth by respondent—that it is the *doing* of prostitution rather than *becoming* a prostitute which is outlawed by that part of Penal Code section 266i, subdivision (a)(2) which forbids encouraging "another person to become a prostitute"—is academically interesting and jurisprudentially innovative. (RB 9) It also proves academic insofar as it ultimately leads to the same conclusions put forth in appellant's brief on the merits: in sum, that subdivision (a)(2) proscribes the instigation of prostitution, not continuing prostitution; the conduct of continuing prostitution is well-covered by other provisions; and that to torque "to become" into "to continue" is to bewig a pig. Different hairstyle, same pig. Which is also the problem with it as innovation. (*California Highway Patrol v. Superior Court* (2008) 158 Cal.App.4th 726, 739 quoting *Gorham Co., Inc. v. First Financial Ins. Co.* (2006) 139 Cal.App.4th 1532, 1544 [courts disregard unambiguous language "'only in 'extreme cases'—those in which, as a matter of law, the Legislature did not intend the statute to have its literal effect.'"].)

No matter how much respondent insists that "'to become a prostitute' means to 'engage in any future acts of prostitution' regardless of the victim's past or present status," (RB 9) this grammatical legerdemain does not actually change the linguistic

nature of the statute, or the basic principles of statutory construction/interpretation to be applied. What the statute says is that it proscribes encouraging someone to *become* a prostitute. "Become," *sensu stricto*, means "become." "Become," given its ordinary definition, means "to come into being," "to grow or come, to be." (http://dictionary.reference.com/browse/become; Random House Dictionary (Random House, 2010); American Heritage Dictionary (Houghton Mifflin, 2009); *People v. Hammer* (2003) 30 Cal.4th 756, 762 ["We begin by examining the statute's words, giving them a plain and commonsense meaning."].) As written, the statute prohibits pandering by encouraging someone to come to be a prostitute, and the courts must take the Legislature at its written word: "the better and more modern rule of construction is to construe a legislative enactment in accordance with the ordinary meaning of the language used and to assume that the legislature knew what it was saying and meant what it said." (*Pacific Gas & Elec. Co. v. Shasta Dam Area Public Utility Dist.* (1955) 135 Cal.App.2d 463, 468; *see also*, *City of Oakland v. Oakland Water-Front Co.* (1897) 118 Cal. 160, 203 ["this court is bound to assume that the legislature meant what it said."].) Thus, subdivision (a)(2) must be interpreted—and applied— to prohibit encouraging someone to *become* a prostitute: not to continue to be a prostitute, not to reconsider being a prostitute, not to decide to be a different sort of prostitute, not to go from full-time to part-time prostitution, not to change outfits or street-corners, or switch pimps. (*People v. Wagner* (2009) 170 Cal.App.4th 499, 506.) But to *become*, to come into being as a

prostitute. (*Keeler v. Superior Court* (1970) 2 Cal.3d 619, 632 ["Penal statutes will not be made to reach beyond their plain intent; they include only those offenses coming clearly within the import of their language."].) And, as amply explicated in the opening brief on the merits, this effectuates the statutory scheme as a whole, exactly as the Legislature intended it be effectuated. (BOM 14-17)

Respondent's contrary interpretation is based on a misapplication of the statutory language by some appellate courts, specifically by the Fourth and Second District Courts of Appeal. (*People v. Bradshaw* (1973) 31 Cal.App.3d 421, 423-426; *People v. Patton* (1976) 63 Cal.App.3d 211, 218; *People v. Hashimoto* (1976) 54 Cal.App.3d 862, 866-867; *but see*, *People v. Wagner*, *supra*, 170 Cal.App.4th at p. 506.) The problem with this line of cases—*Patton*, *Bradshaw*, *Hashimoto*, and now *People v. Cason* (2009) 179 Cal.App.4th 1419—is that they rest upon an illusory foundation: the 1976 decision of the Fourth District in *People v. Patton*, *supra*, 63 Cal.App.3d 211, which expanded application of pandering by encouraging to include encouraging someone who is a prostitute to remain a prostitute. But, as noted in appellant's opening brief on the merits (BOM 10, fn. 1), the Fourth District's holding in *Patton* relied upon the Second District's decision in *People v. Bradshaw*, *supra*, 31 Cal.App.3d at pp. 423-426, without considering the fact that *Bradshaw* involved encouraging someone to remain in a house of prostitution (*People v. Patton*, *supra*, 63 Cal.App.3d at p. 218), a occupational continuation otherwise covered by the anti-pandering statute. (Pen. Code § 266i(a)(4).) In

short, *Patton* built *Bradshaw* beyond its foundations, which, as noted in *People v. Wagner*, *supra*, 170 Cal.App.4th at p. 506, were themselves baseless in terms of supporting the conclusion that one can pander a prostitute:

> The seminal case Is *Bradshaw*, which merely announces the rule, while frankly admitting it is based entirely on the outcome of another case—*People v. Frey* (1964) 228 Cal.App.3d 33 []—which the *Bradshaw* court expressly acknowledges *did not actually address the issue*...

A "rule," as noted in *Wagner*, adopted "without serious question" by both *Patton* and *Hashimoto* (*id.*, at p. 507), and, most recently, reiterated by the Fourth District in *People v. Cason*, *supra*, 179 Cal.App.4th 1419,1433. But the fact that a statute has been improperly applied more than once does not sanction its continued misuse; baseless precedent is not worthy authority. (*Rogers v. Tennessee* (2001) 532 U.S. 451, 472, diss. opn, Scalia, J.)

Again, *Bradshaw* concerned encouraging someone to remain in a house of prostitution, specifically proscribed by section 266i, subdivision (a)(4). Respondent argues that the Legislature's choice to include an articulated prohibition against encouraging someone "to remain" in a brothel in one part of section 266i, but not articulating a similar prohibition against encouraging someone "to remain" a prostitute in general is irrelevant to the larger aims of the statute. (RB 18) However, as respondent correctly notes, subdivision (a)(4) "was enacted to address the problem of pandering in and for brothels." In other words, subdivision (a)(4) was targeted at a specific form or mode of pandering, just as subdivision (a)(2) was enacted to address the problem of

encouraging someone to become a prostitute. Too, as also noted by respondent, there is no requirement of success relative to the crime of encouraging someone to remain a brothel-worker (RB 18) —just as there is no overt requirement of success relative to the crime of encouraging someone to become a prostitute.[1] (Pen. Code § 266i(a)(2).) Therefore, the only difference that remains between subdivision (a)(2) and subdivision (a)(4) is the salient difference: the Legislature affirmatively criminalized encouraging someone to remain a prostitute in one instance, and not in another. (*People v. Montgomery* (1942) 47 Cal.App.2d 1, 12 [for purposes of brothel-working, "[i]t is immaterial whether the female 'procured' is an innocent girl or a hardened prostitute of long experience."], disapproved on other grounds, *Murgia v. Superior Court* (1975) 15 Cal.3d 286, 301, fn. 11.) And therefore, *contra Bradshaw* and *contra* respondent, courts must maintain that distinction rather than override it. (*People ex rel. Lungren v. Superior Court* (1996) 14 Cal.4th 294, 307 [more restrictive meaning to be adopted if more

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[1] Lack of success was also one of the conclusions reached by the court in *People v. Bradshaw*, *supra*, 31 Cal.App.3d at p. 425. It is worth footnoting that this particular conclusion was based exclusively on *People v. Lax* (1971) 20 Cal.App.3d, 481 [brothel-solicitation] and the "effect" of *People v. Frey* (1964) 228 Cal.App.2d 33 [brothel-solicitation]. (*People v. Bradshaw*, *supra*, 31 Cal.App.3d at p. 425.) It is also worth noting that the *Bradshaw* court acknowledged that neither case stood for result it was being used to support: "It is that Lax is not square authority for the case at bench.... However, it comes as close to the issue herein under discussion as any California case of which we are aware. Coupled with the effect of (although not the discussion in) Frey, we conclude that success is not a necessary element of the offense proscribed by the word "encourage" as used in subdivision (b) of section 266i." (*Ibid.*, fn. omitted.) But, as this Court has repeatedly stated, "'[i]t is axiomatic that cases are not authority for propositions not considered.'" (*Silverbrand v. County of Los Angeles* (2009) 46 Cal.4th 106, 127, quoting *In re Marriage of Cornejo* (1996) 13 Cal.4th 381, 388.) It would appear that the Fourth District in *Bradshaw*, if not literally planting the seeds of its own collapse, was at least frankly admitting that it was on shaky jurisprudential ground.

expansive meaning makes other terms unnecessary/redundant].) Too, the statutory scheme against pandering must be considered in conjunction with the statutory prohibition against pimping: "[s]ection 266h (pimping) and 266i (pandering) were enacted by the same legislature and should be treated together." (*People v. Courtney* (1959) 176 Cal.App.2d 731, 741; *People v. ex rel. Frick* (1866) 30 Cal. 427, 430 ["Both Acts were passed upon the same day and relate to the same subject matter. They are, therefore, according to a well settled rule of interpretation, to be read together, as if parts of the same Act."]) For its part, respondent fails to adequately explain how expanding the definition of pandering by encouraging beyond its express terms would reach any conduct not already covered by the pimping statute.[2] (*People v. Honig* (1996) 48 Cal.App.4th 289, 327 [statutes to be interpreted "by reference to related statutes"]; BOM 14-16)

Most recently, in *People v. Cason*, *supra*, 179 Cal.App.4th 1419, the Fourth District affirmed its *Bradshaw* analysis, though without similar apology for its lack of foundation, and with redoubled approval of its own policy aspirations. (*Id.*, at p. 1433.) In *Cason*, the court rejected any interpretation of the statute in which "become" means "become," i.e., "to change one's state of being" because: "[t]his somewhat old-fashioned notion, seems

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[2] Respondent briefly argues that one could be potentially guilty of pimping via "passively" deriving an income from a prostitute under an existing pimping arrangement. But respondent does not really distinguish how the maintenance of a pimping arrangement would differ from encouragement of prostitution: every act perpetuating the pimp-prostitute relationship (including the act of taking money from the prostitute) would necessarily reaffirm that contract, thus encouraging its continuation, and thus, encouraging the prostitute's continuing prostitution. And thereby engaging in pandering by encouragement. (BOM 14-16)

to ignore the fact that 'to be' a prostitute necessarily involves 'engaging in' the prohibited criminal activity." (*Ibid.*[3]) Thus, according to the lower court, the literal meaning of the statute should be passed over in favor of a more modern version, in which "to become" means "to be," insofar as "to be" means "to engage in." (*Ibid.*)

As a predicate matter, if "to engage in" is now the equivalent of "to become," there would appear to be a success requirement latent in this revisioned language. For if engagement presupposes status, i.e., "to be" means "to act *as*," then courts could no longer impose liability on someone who encourages someone "to be" a prostitute if that person does not at some point "act as" a prostitute. And this would, by any measure,

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[3] Unfortunately, the appellate court here does not dilate upon its position that "to be" means "engaging in," and cites no authority for this equation. While there is certainly a philosophical argument that essence is determined purely by existence, and a counter-position which maintains that existence is only one aspect of being as such (such that "Socrates is" may be represented by either $\exists x$, or $\sim(\exists x)$, where x = Socrates, who exists and does not exist in the sense of "being," or alternatively, whose existence or non-existence is only one part of his "being," insofar as "being" is distinguished from identity (Socrates = Socrates ($\exists! x$)), prediction ("Socrates is wise": $w(x)$) and/or generic category/implication (Socrates is a man, man is an animal, Socrates is an animal: $x = A \wedge (x = M) \& \forall(M) \equiv (A)$); *see generally*, http://plato.stanford.edu/entries/existence/#Dis), and a more existential argument that holds (like the Fourth District) that there is no essence apart from existence, i.e., no being separate from becoming (emblematized by Sartre's famous maxim "Existence precedes essence," from his 1945 *Existentialism is a Humanism* (Yale UP, 2007)), the law appears strictly Aristotelian in this regard: the substance, or being, of a thing *is* its essence (Aristotle, *The Metaphysics* (Penguin Classics, 1999). Thus, Black's Law Dictionary (1979 ed.) defines essence as "that which is indispensible. The gist or substance of any act; the vital constituent of a thing: that without which a thing cannot be itself." Similarly, this Court has considered "essence" as extant, a state of being, so the "essence" of one crime (DUI) may be functionally differentiated from another (BAC 0.10) insofar as one may be committed without committing the other "and '[t]hus the essence of the two offenses is different....'" (*People v. Traylor* (2009) 46 Cal.4th 1205, 1216-1217, quoting *People v. Dunn* (1984) 159 Cal.App.3d 1110, 1118 [while noting the lower court "did not go on to provide a definition of 'essence'].) By this token, "becoming" a prostitute is "in essence" different from "being" a prostitute, or engaging in prostitution.

defeat the general purpose of the statute. (*People v. Montgomery*, *supra*, 47 Cal.App.2d at p. 24.) For, as conceded by both parties, the purpose of the anti-pandering statute is to "'cover all the various ramifications of the social evil of pandering and include them all in the definition of the crime, with a view of effectively combating the evil sought to be condemned.'" (*People v. Fixler* (1976) 56 Cal.App.3d 321, 371, quoting *People v. Montgomery*, *supra*, 47 Cal.App.2d at p. 24.) But to the extent this description is not self-referential (i.e., that the crime of pandering covers all the evils of the crime of pandering), it does not mean that courts are free to reach the crime(s) of pandering by any means necessary: a court may not base its view of public policy on "general considerations of supposed public interests'" rather than the law itself, and solid precedent. (*Muschany v. United States* (1945) 324 U.S. 49, 66.)

More substantively, what the *Cason* court obfuscates here is the "fact" that "to be"[4] is, in fact, not the same as "to become"—the subdivision does not prohibit "*being*" a prostitute, but "*becoming*" a prostitute. Thus, the statute is internally consistent: it prohibits becoming a prostitute by prohibiting encouraging someone to become a

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[4] Compare the previous definition of "become" with the definition of "be": verb (used without object) "to exist or live," "to occupy a place or position," "to continue or remain as before," (used as a copula to connect the subject with its predicate adjective, or predicate nomative, in order to describe, identify, or amplify the subject). (http://dictionary.reference.com/browse/be.) Of course, this distinction is collapsed in contemporary philosophy with the argument that absolute being is absolute becoming given that absolute becoming is, under contemporary notions of quantum physics, "the happening of events" in a given time/space. However, notions of practical causality and consequent culpability inherent in the law militate against a strict concept of relativity. (*See generally*, http://plato.stanford.edu/entries/spacetime-bebecome/.)

prostitute. (Pen. Code § 266i(a)(2); *People v. Wagner*, *supra*, 170 Cal.App.4th at pp. 507-508; *c.f.*, *Ex parte De La O* (1963) 59 Cal.2d 128, 153 [the "non-technical phrase" defining narcotic addict as including one in "imminent danger of *becoming* addicted" is plain on its face, requiring no further definition; "Neither 'addicted to' nor 'imminent danger of becoming addicted' are technical terms of art."], emphasis added.) Though a contrary interpretation would settle appellant's hash, and settle the hash of other pimps looking to convince working prostitutes to change management, this is neither the point nor aim of statutory codification or interpretation. Contrary to the *Cason* court's opinion, challenging the applicability of the pandering statute based on the express language of that statute is a matter for reasoned judicial deliberation, not merely an opportunity for courts to "deflect[] attempts by panderers to weasel out of their convictions...." (*Ibid.*) For the broader point here is that regardless of whether the anti-pandering statute is as *au courant* or metaphysically expansive as the Fourth District would have it, any updating is a matter for the Legislature in the first instance. (*Rogers v. Tennessee*, *supra*, 532 U.S. at p. 476.) As Blackstone stated, it is not enough that a contemporary court either fail to identify or to find unreasonable a law's originary intent: "it is not in [a common law judge's] power to alter it..." (1 W. Blackstone, Commentaries 69, 70-71, quoted in *Rogers v. Tennessee*, *supra*, 532 U.S. at p. 473.) As Allen wrote, [T]he unreasonableness of a custom in modern circumstances will not affect its validity if the Court is satisfied of a reasonable origin." (*Ibid*, quoting Allen 140-141.) And, as Coke posited: "A custom

once reasonable and tolerable, if after it becomes grievous, and not answerable to the reason, whereupon it was grounded, yet is to be…taken away by an act of parliament." (2 E. Coke, Institute of the Laws of England, 664; *id.*, at 97 ["No law, or custome of England can be taken away, abrogated, or adnulled, but by authority of parliament."], quoted in *Rogers v. Tennessee*, *supra*, 532 U.S. at p. 473.) If the anti-pandering statute is inadequate, let the Legislature change it.

The contrary approach adopted in *Cason* also flies in the face of this Court's statement that where the statutory language is ambiguous, "[b]oth the legislative history of the statute and the wider historical circumstances of its enactment may be considered in ascertaining the legislative intent." (*California Teachers Assn. v. Governing Bd. of Rialto Unified School Dist.* (1997) 14 Cal.4th 627, 659.) And while the language of subdivision (a)(2) is perfectly clear, the legislative history and historical circumstances are equally crystalline—at the time the pandering by encouragement statute was enacted, it aimed at curbing the crime of turning women to prostitution, particularly to brothel prostitution. This harm was judicially understood as separate from the harm of pimping itself, prohibited by its sister-statute. After noting that the pimping/pandering statutes were enacted together and are to be treated together, the Second District in 1959 underscored that while their overall animus may be the same, the two provisions had distinct targets:

> In adopting the section making pandering a crime, the legislature undoubtedly had in mind to discourage the nefarious business of

> replenishing houses of prostitution with inmates. [] Certainly, pimping is equally nefarious. The object of the section is to stop such course of conduct and to discourage prostitution....

(*People v. Courtney*, 176 Cal.App.2d at p. 741; *People v. Cimar* (1932) 127 Cal.App. 9, 12["It may be conceded the crime of pandering is not accomplished unless the accused person procures the female to become an inmate of the house for the purpose of engaging in prostitution.... If the conduct of the defendant assisted, induced, persuaded, or encouraged the female to become an inmate of the house of ill fame for the purpose of practicing prostitution, the crime of pandering is sufficiently established. "].) If the crime of brothel prostitution does not currently pose the same magnitude of social harm as street prostitution, again, this is a legislative, not judicial determination, deserving a legislative, not judicial remedy. (*Rogers v. Tennessee*, *supra*, 532 U.S. at p. 473.)

In rejecting the argument that one cannot pander a prostitute, the court in *Patton* wrote that "[t]he fallacy involved in this reasoning is the assumption that the Legislature was concerned with actual, rather than potential, harm...." (*People v. Patton*, *supra*, 63 Cal.App.3d at p. 218.) The *Patton* court then identified the "significant potential for social harm" involved in encouraging a prostitute to change her "business relations," using this potential harm to justify expanding subdivision (a)(2) beyond its terms. (*Ibid.*) But the fallacy in this reasoning are its counter-intuitive assumptions. First, that the Legislature meant the statute to indirectly ameliorate a potential social ill, rather than the actual social ill it directly addressed. (*Contra*, *People v. Wagner*, *supra*, 170 Cal.App.4th

at pp. 510-511 [loose interpretation of subdivision (a)(2) belied by "quite narrow terminology" used to define other types of pandering: "This looks to us like a legislature taking pains to be precise in what it was prohibiting."]). Second, that this unspoken and indirect (at best) or hypothetical and speculative (at worst) legislative intent would permit the *Patton* court—then followed by *Bradshaw*—to reach out and ameliorate that same quiescent harm. Or, as trenchantly put by the court in *People v. Wagner*, *supra*, 170 Cal.App.4th at p. 507, "The *Bradshaw* court found in former subdivision (b) (now subd. (a)(2)) of section 266i, an answer to a question no one in the Legislature seems to have asked."

In 1767, the Chief Justice of Massachusetts simply stated: "'[T]he Judge should never be the Legislator: Because, then, the Will of the Judge would be the Law: and this tends to a State of Slavery.'" (*Rogers v. Tennessee*, *supra*, 532 U.S. at p. 476, quoting 1 Horwitz 5.) That pandering is a crime "against society, public decency and morals" (RB 13), may well be. However, this does not give courts license to rewrite the language of the anti-pandering statute to punish encouraging someone "to be"—where the law only prohibits encouraging someone "to become." Appellant urged being, not becoming; his conviction must thus be reversed. (*People v. Wagner*, *supra*, 170 Cal.App.4th 509.)

CONCLUSION

For the foregoing reasons, in addition to those stated in the opening brief on the merits, appellant's conviction must be reversed.

Dated: February 9, 2010

Respectfully submitted,

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Jomo Zambia

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	)	

CERTIFICATION

Pursuant to California Rules of Court, rule 8.504, I certify that the foregoing reply brief on the merits contains 3,720 words, inclusive.

Vanessa Place
Attorney for Appellant

Proof of Service

I am a citizen of the United States, over the age of 18 years, employed in the County of Los Angeles, and not a party to the within action; my business address is Post Office Box 18613, Los Angeles, California 90018. I am a member of the bar of this court.

On February 10, 2010, I served the within

REPLY BRIEF ON THE MERITS

in said action, by placing a true copy thereof enclosed in a sealed envelope, addressed as follows, and deposited the same in the United States Mail at Los Angeles, California.

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I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of February, 2010 at Los Angeles, California.

Vanessa Place