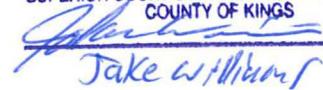


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FILED

MAR 16 2022

NOCONA SOBOLESKI, CLERK OF COURT
SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF KINGS

 DEPUTY
Jake Williams

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF KINGS

In re Application of

No. 21W0033A

ADORA DANYEL PEREZ,

**RULING GRANTING PETITION FOR
WRIT OF HABEAS CORPUS**

Petitioner,

for Writ of Habeas Corpus.

On February 19, 2021, Petitioner ADORA DANYEL PEREZ ("Petitioner") filed a petition for writ of habeas corpus claiming ineffective assistance of counsel and lack of a knowing, voluntary, and intelligent waiver of rights and plea in Kings County Superior Court Case No. 18CM0021 ("Criminal Case"). Specifically, Petitioner alleges, as follows:

1. That appointed counsel (Robert Stover, Esq.): (A) failed to recognize and advise Petitioner of a meritorious defense and took no steps to dismiss a fundamentally impossible charge; (B) failed to file motions or otherwise challenge the incorrect legal assumption on which the murder charge rested; and (C) failed to advise Petitioner that a murder conviction requires proof of malice and that she could not be convicted of murder unless a jury determined beyond a reasonable doubt that she knew her conduct endangered the life of her fetus;
2. That appointed counsel (Melina Benninghoff, Esq.) failed to raise within her Motion to Withdraw Plea, the legal impossibility of a murder conviction arising from the facts alleged in the Criminal Case; and,

1 3. That appellate counsel (Michele Douglass, Esq.) failed to challenge the
2 validity of the plea on direct appeal.

3 The petition prays as follows: “1. Issue a writ of habeas corpus, reverse petitioner’s
4 conviction, and/or issue an order to show cause why this Court should not reverse
5 petitioner’s conviction; [¶] 2. Grant whatever further relief this Court finds appropriate
6 in the interests of justice.” (Petition, 20.)

7 On June 28, 2021, an Order to Show Cause issued in this case. The Return to the
8 Petition was filed on July 21, 2021. The Traverse was filed on August 20, 2021.

9 On September 20, 2021, an Order Re: Petition for Writ of Habeas Corpus issued. In
10 addition to the fact that the Order requested additional briefing by the parties, it determined
11 that an evidentiary hearing would be required in connection with this matter.

12 On October 20, 2021, an Amended Order Re: Petition for Writ of Habeas Corpus
13 was filed. The Amended Order retained the finding of the court that an evidentiary hearing
14 and additional briefing would be required in connection with Petitioner’s request for habeas
15 corpus relief.

16 On November 29, 2021, a Second Amended Order Re: Petition for Writ of Habeas
17 Corpus was filed. The Second Amended Order changes only the date of the scheduled
18 Case Management Conference.

19 Between September 20, 2021 and December 20, 2021, all parties submitted briefs
20 addressing those issues raised in the Orders Re: Petition for Writ of Habeas Corpus.

21 On December 20, 2021, a Case Management Conference was conducted in
22 connection with the hearing of the Petition. At the Conference, the court asked the parties
23 to address the impact, *if any*, of the recent decision issued by the Court of Appeal, First
24 Appellate District, Division Three in *People v. Richardson* (2021) 65 Cal. App. 5th 360.¹ In
25 *Richardson*, the court held that the prosecution should not have offered, and the trial court
26 should not have accepted, defendant’s plea to human trafficking of a minor for a sex act, in

27 ¹ Although not binding upon this tribunal, it is worth noting that in a January 4, 2022 unpublished decision, the
28 California Court of Appeal, Fifth Appellate District, cited to the *Richardson* decision for the following
29 propositions: “The trial court need not obtain an element-by-element factual basis but need only obtain a
30 prima facie factual basis for the plea” and “[t]o prevail on his claim, defendant would essentially need to show
31 factual or legal impossibility . . .” (*People v. Picazo*, 2022 Cal. App. Unpub. LEXIS 29, 34-35.)

RULING GRANTING PETITION FOR WRIT OF HABEAS CORPUS

1 violation of California Penal Code section 236.1(c)(1), when the actual age of the victim (26
2 years old) made the negotiated plea factually impossible. According to the *Richardson*
3 Court, it is an abuse of discretion for the trial court to accept a guilty plea based upon a
4 stipulation of defense counsel to a factual impossibility. (*Id.* at p. 372-373.)

5 Respondent's Supplemental Brief was filed January 18, 2022. On February 7, 2022,
6 Petitioner filed her Reply to Respondent's Supplemental Brief.

7 On February 22, 2022, Petitioner and Respondent appeared through their counsel of
8 record and presented oral arguments on the *Richardson* issue as summarized above. The
9 court took the *Richardson* issue under consideration and set an evidentiary hearing date of
10 April 8, 2022. The court informed all counsel that if the court's ruling on the *Richardson*
11 issue rendered moot the remaining issues in the case and/or negated the need of the court
12 to conduct an evidentiary hearing in this matter, the April 8, 2022 hearing would be
13 vacated. The court stated to counsel that its ruling on the *Richardson* issue would be
14 issued by March 17, 2022.

15 **I. Underlying Criminal Case**

16 From the court's review of the Criminal Case record, it appears that on May 26,
17 2018, the Kings County District Attorney filed an amended complaint that charged
18 Petitioner with murder of a fetus (Cal. Pen. Code §187(a) [Count 1]) and voluntary
19 manslaughter (Cal. Pen. Code §192(a)) [Count 2]). Petitioner entered a plea in the
20 Criminal Case to the voluntary manslaughter charge in exchange for dismissal of Count 1.
21 In connection with the plea, the following exchange occurred between the court and the
22 parties:

23 The Court: . . . The first thing I want to make sure we all understand is the basis for
24 the plea. And what the People are saying is that -- and your attorney is saying
25 is that you are going to enter a plea under People vs. West. [¶] As I
26 understand the reason for that is Count 1 is a murder conviction for which you
27 can be sentenced to 15 years to life in prison, 25 to life if they find it was
28 willful, deliberate, and premeditated. And that you want to plead guilty to the
voluntary manslaughter even though the facts may not support that plea
because you want to avoid the possibility of getting that life sentence on the
murder case because of the death of your fetus. Is that what's happening?

The Defendant: Yes, sir.

RULING GRANTING PETITION FOR WRIT OF HABEAS CORPUS

1 The Court: All right. Do you understand that a violation of Penal Code Section 192
2 subparagraph (a) is a voluntary manslaughter which is punishable by a low
3 term of 3 years, a middle term of 6 years, and an upper term of 11 years in
4 the state prison, and there's no agreement as to what that sentence would be.
5 . . . And it could be that 3 years, that 6 years, or it could be 11 years. Do you
6 understand that?

7 The Defendant: Yes, sir.

8 * * *

9 The Court: Ms. Perez, how do you plead in the First Amended Complaint to Count 2
10 that on or about December 31st, 2017, you committed a felony violation of
11 Penal Code Section 192 subparagraph (a), commonly called voluntary
12 manslaughter, in that you did unlawfully and without malice kill a confidential
13 victim, a human being, upon sudden quarrel in a heat of passion. How do you
14 plead to that?

15 (Private conversation had between the defendant and her counsel.)

16 The Defendant: No contest.

17 * * *

18 The Court: And you are entering this plea even though you are not really guilty of
19 Count 2, factually you can't be, but you are entering into that plea to avoid the
20 conviction in Count 1; is that correct?

21 (Private conversation had between the defendant and her counsel.)

22 The Defendant: Yes, sir.

23 The Court: And is there a factual basis that would have been presented as to Count
24 1?

25 Mr. Stover: Your Honor, had this matter proceeded to trial, the People would have
26 provided evidence that Ms. Perez presented at Hanford Community Hospital
27 on December 31st, 2017. She was pregnant with an unborn child. When the
28 child was eventually delivered, the child was stillborn. The primary
contributing factors to the child's death were asphyxiation from a placental
detachment and a toxic level of methamphetamine within the fetus. Those
were both based on Ms. Perez's admitted use of methamphetamine during
the term of the pregnancy and were the primary contributing factors to the
death of the fetus.

The Court: Is that what happened, Ms. Perez?

RULING GRANTING PETITION FOR WRIT OF HABEAS CORPUS

1 The Defendant: Yes, sir.²

2 Petitioner filed a Motion to Withdraw Plea on May 29, 2018. In a supporting
3 declaration, Petitioner alleged that good cause existed to withdraw her plea because she
4 did not understand the change of plea proceeding and was unaware that she entered a no
5 contest plea. She also alleged that her appointed counsel did not investigate the possible
6 causes of her baby's death or discuss any potential defenses with her.

7 On June 15, 2018, Petitioner's Motion to Withdraw Plea was denied. Petitioner was
8 thereafter sentenced to the aggravated term of eleven (11) years. On appeal, and in
9 response to a brief filed pursuant to *People v. Wende* (1972) 25 Cal. 3d 436, the judgment
10 in the Criminal Case was affirmed in all respects relevant herein.³ The factual background
11 adopted on appeal, is as follows:

12 On December 31, 2017, at 12:37 a.m., a Hanford police officer was dispatched to
13 Adventist Medical Center regarding a suspicious, full-term birth of a stillborn baby to
14 Perez earlier that night. The baby's placenta had detached from the uterine lining,
15 which is extremely common in mothers who habitually use methamphetamine. After
16 being advised that the stillbirth may have resulted from illegal drug abuse, the officer
17 learned from a sheriff's deputy that Perez admitted she used methamphetamine
18 during her pregnancy. Based on physical signs the baby exhibited, a doctor
19 estimated that the baby died between 12 and 18 hours earlier. The doctor believed
20 the baby died from extensive drug use by Perez and he advised the officer that
21 Perez tested positive for methamphetamine and THC. A review of Perez's medical
22 records was conducted, and it disclosed that in prior visits, Perez had several
23 positive tests for methamphetamine. Perez's chart indicated that she had not had
24 any prenatal care. During an interview with a probation officer, Perez stated she last
25 used methamphetamine approximately two and a half days before the delivery of her
26 stillborn child and marijuana a day prior to the delivery. (Opinion in Case No.
27 F077851, filed on March 26, 2019.)

28 **II. Habeas Corpus Relief is Appropriately Granted to Petitioner**

A. *Applicable Law*

In *People v. Richardson* (2021) 65 Cal. App. 5th 360, the Court of Appeal, First
Appellate District, Division Three, found that it was an abuse of discretion for the trial court

² Plea Transcript filed on May 11, 2018 in Case No. 18CM0021, 5:15-14:26.

³ The Court of Appeal directed that an Amended Abstract of Judgment be filed to reflect the court's imposition of a restitution fine of \$3,300 and a suspended parole revocation fine in the same amount.

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1 to accept a guilty plea based upon a stipulation of defense counsel to a factual
2 impossibility, *to wit*: human trafficking of a minor for a sex act when the actual age of the
3 victim was 26 years old. The holding in *Richardson* is not novel, but based upon
4 established law, including *People v. Holmes* (2004) 32 Cal. 4th 432, 443 [acceptance of a
5 plea based upon a stipulation to a factual impossibility was an abuse of discretion], *People*
6 *v. Hoffard* (1995) 19 Cal. 4th 1170, 1182 [trial court is obligated to determine whether there
7 is a factual basis for a plea of guilty or no contest when that plea arises from a negotiated
8 resolution of the charges], and California Penal Code §1192.5. (*Richardson, supra*, 65 Cal.
9 App. 5th 360, 372.)

10 California Penal Code §192(a) states in relevant part: “Manslaughter is the unlawful
11 killing of a *human being* without malice. It is of three kinds: [¶] (a) Voluntary—upon a
12 sudden quarrel or heat of passion. . .” (Emphasis added.) There is no crime in California of
13 manslaughter of a fetus. A violation of California Penal Code §192, subdivision (a),
14 expressly requires the victim to be “a human being.” (See, *People v. Brown* (1995) 35 Cal.
15 App. 4th 1585, 1592; *People v. Dennis* (1998) 17 Cal. 4th 468, 505-506.)

16 B. Summary of the Arguments Made

17 In its Supplemental Brief, the Kings County District Attorney’s Office (People) seeks
18 to distinguish the *Richardson* decision based upon the fact that, “the parties in *Richardson*
19 never stated that they were entering their plea pursuant to *People v. West, supra*.”
20 (People’s Supplemental Brief [PSB] 2:2-8.) In *People v. West* (1970) 3 Cal. 3d 595, the
21 California Supreme Court held that “[i]n accepting a knowing and voluntary plea of guilty or
22 nolo contendere⁴, is not limited in its jurisdiction to the offenses charged or necessarily
23 included in those charged.” According to the *People*, since *Richardson* is not based upon a
24 *West* plea, the decision therein does not overrule *West* in whole or in part. [PSB 2:8-16]
25 The People go on to state that: (1) Petitioner’s plea to a violation of California Penal Code
26 §192(a) is reasonably related to Penal Code §187(a) [both involve the death of a person],
27

28 ⁴ “*West* does not actually involve a claim of innocence but addresses the validity of a plea to an uncharged
lesser offense entered pursuant to a plea bargain. A *West* plea is characterized as a plea of nolo contendere,
not admitting a factual basis for the plea. *West* approves the practice of plea bargaining to a lesser charge in
order to avoid exposure to greater penalties.” (*Loftis v. Almager* (2012) 704 F. 3d 645, 651; citing, *In re*
Alvernaz (1992) 2 Cal. 4th 924, 932.)

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1 and (2) a plea under *West* does not require the type of factual basis discussed in
2 *Richardson*. [PSB 6:5-9.]

3 The People admit that “the charge Petitioner plead to is not a lesser-included charge
4 nor is it a charge that she could be charged with for the death of her baby.” [PSB 7:12-13.]
5 The People go on to argue, however, that a no contest plea entered pursuant to *People v.*
6 *West, supra*, 3 Cal. 3d 595 is not limited to the offenses charged or necessarily included
7 within those charged and “as long as the plea is categorically related and/or reasonably
8 related”, it is appropriately entertained by the court. [PSB 7:17-20, 21-24; *Citing, Id.* at p.
9 613.] The People further state that, unlike in *Richardson* where the plea was based upon a
10 factual impossibility, in this case “Petitioner could have committed voluntary manslaughter.
11 The charge she pled to, Penal Code section 192(a) was a *legal* impossibility not a *factual*
12 impossibility.” [PSB 8:9-11.]

13 In her Supplemental Reply, Petitioner argues that: (1) because all negotiated pleas
14 (including *West* pleas) require the court to find a *prima facie* factual basis for the plea,
15 *Richardson* is directly on point, and (2) where the record conclusively establishes facts that
16 make Petitioner’s commission of a crime impossible, a court abuses its discretion by finding
17 a factual basis and accepting a guilty plea to the crime. [Supplemental Reply (SR), 2:2-9.]
18 Petitioner also argues that although the parties in *Richardson* did not expressly state that a
19 *West* plea was being entered, there is no requirement that counsel utter the “magic words”
20 of *West*. Instead, the *West* case stands only for the proposition that court may accept
21 pleas to charges that are not lesser included offenses as long as the charge is “reasonably
22 related to defendant’s conduct”; and since in *Richardson*, “the bargain as disclosed on the
23 record included pleading to a related but not lesser-included offense”, it was a *West* plea.
24 [SR 4:16-26.] *Citing* California Penal Code §1192.5⁵ and *People v. Marlin* (2005) 124 Cal.
25 App. 4th 559⁶, Petitioner also challenges the People’s claim that a plea entered under *West*
26 does not require a factual basis. [SR 5:2-5.]

27
28

⁵ California Penal Code §1192.5(c) states in relevant part: “[t]he court shall also cause an inquiry to be made
of the defendant to satisfy itself that the plea is freely and voluntarily made, and that there is a factual basis
for the plea.”

⁶ In *Marlin*, the California Court of Appeal, Third Appellate District, stated in relevant part: “Pursuant to
section 1192.5, the trial court is obligated to determine whether there is a factual basis for a plea of guilty or

RULING GRANTING PETITION FOR WRIT OF HABEAS CORPUS

1 According to Petitioner, in taking her plea in the Criminal Case, the trial court was
2 required to find that a factual basis existed to support the manslaughter charge before it
3 accepted her plea. [SR 5:16-17.] The fact that Petitioner entered a plea to a related but not
4 lesser-included offense and/or that she was advised of the potential consequences and
5 agreed to the illegal plea, does not render the plea valid. [SR 5:16-23; *citing, Richardson,*
6 *supra*, at p. 371.] Moreover, whether viewed as a factual or legal impossibility, because it
7 is undisputed that due to the age of the victim (*i.e.*, a fetus) Petitioner *could not have*
8 violated Penal Code section 192(a), her plea to that charge should be vacated. [SR 6:6-18.]

9 C. *Petitioner's Plea Bargain Was Illegal*

10 Charged with murder of a fetus, Petitioner entered a no contest plea of the type
11 envisioned in *West*, to voluntary manslaughter. Similar to the *Richardson* Case: (1) the
12 voluntary manslaughter charge to which Petitioner ultimately entered her no contest plea,
13 was part of an amended pleading filed *for the purpose of* effecting a resolution of the
14 pending case, and (2) in exchange for Petitioner's plea, the more serious charge was
15 dismissed, with sentencing left to the discretion of the trial court. Although there are many
16 ways by which a trial court may inquire into the factual basis for a plea (*see, Richardson,*
17 *supra*, 65 Cal. App. 5th at p. 372-373), in this case the facts were provided by defense
18 counsel and included a description of the victim as an unborn child or fetus. Specifically,
19 Mr. Stover stated:

20 . . . She was pregnant with an unborn child. When the child was eventually delivered,
21 the child was stillborn . . . were the primary contributing factors to the death of the
22 fetus. (Emphasis added.)⁷

23 _____
24 no contest when that plea arises from a negotiated resolution of the charges. (*See People v. Hoffard, supra,*
25 10 Cal. 4th at p. 1182.) Although not constitutionally required (*id.* at p. 1183), such an inquiry furthers
26 constitutional considerations attending a guilty plea (*id.* at p. 1183, fn. 11), protects against the entry of a
27 guilty plea by an innocent defendant, and makes a record in the event of appellate or collateral attacks on that
28 plea. (*Id.* at p. 1183.) Given these significant policy considerations, a failure to make a sufficient inquiry, while
not a constitutional or jurisdictional requirement, is one of the 'other' grounds going to the legality of the
proceedings in the trial court." (*Id.* at p. 571.)

⁷ In its opinion, the California Court of Appeal, Fifth Appellate District, found that the fetus died between 12
and 18 hours *prior to birth*.

1 Accordingly, while there can be no dispute that voluntary manslaughter is a charge
2 which is reasonably related to homicide⁸, the relationship between the crimes does not
3 overcome the more fundamental problem that the stipulation in this case was to a *factual* or
4 *legal impossibility*⁹, *to wit*: voluntary manslaughter based upon the killing of “an unborn
5 child” or “fetus”. In regard to this issue, all parties admit that voluntary manslaughter of a
6 fetus is not a crime in California. (See, *People v. Brown, supra*, 35 Cal. App. 4th at p. 1592;
7 see also, *Id.* at p. 1593 [recognizing the legislative decision not to include “fetus” within the
8 Penal Code §192 was intentional].)

9 Furthermore, lest there be any question about a trial court’s ability to accept a plea
10 of no contest to a legally or factually impossible crime, the *Richardson* Court stated as
11 follows:

12 At the risk of redundancy we repeat: A defendant cannot plead no contest to human
13 trafficking of a minor for a sex act when the victim is an adult well over the age of 18.
14 Where, as here, the “trial court is asked to approve an illegal plea bargain ... the
15 proper course of action for the court is clear. It should decline to act in excess of its
16 authority and should refuse to approve an arrangement under which it is called upon
17 to do so.’ (*In re V.B.* (2006) 141 Cal.App.4th 899, 908 [46 Cal. Rptr. 3d 451]; accord,
18 *People v. Soriano* (1992) 4 Cal.App.4th 781, 785 [6 Cal. Rptr. 2d 138] [“Faced with
19 ... an unlawful plea bargain, a trial court should withhold approval of the bargain.”].)”
20 (*People v. John* (2019) 36 Cal.App.5th 168, 176 [248 Cal. Rptr. 3d 288].)

21 Similarly in this case, faced with Petitioner’s illegal plea bargain based upon a factual or
22 legal impossibility and/or non-existent crime, *to wit*: the unlawful and without malice killing
23 of a fetus, the trial court should have withheld its approval of the same.

24 ⁸ In its opinion, the *West* Court explained, “In common practice and under the ABA standard a reasonable
25 relationship between the charged offense and the plea obtains when (1) the defendant pleads to the same
26 type of offense as that charged (the ABA Standards refer to this as a ‘categoric similarity’), or (2) when he
27 pleads to an offense which he may have committed during the course of conduct which led to the charge.” (*Id.*
28 at p. 613.) The *West* Court then went on to explain that “[i]n homicide, for example, there may be reduction
from murder to manslaughter or negligent homicide or, occasionally, even to assault, but grossly inconsistent
offenses, such as larceny or possession of narcotics are never arbitrarily used in place of murder unless
these offenses were part of the actual conduct involved.’ (Newman, p. 100; see ABA Standards, p. 68;
Comment, Judicial Plea Bargaining (1967) 19 Stan.L.Rev. 1082, 1087 fn. 35.)” (*Id.* at 613.)

⁹ See also, *People v. Solariano* (1992) 4 Cal. App. 7th 781, 784 [legal impossibility]; *People v. Bean* (1989)
213 Cal. App. 3d 639, 646-647 (nullifying plea of guilty to “attempted petty theft with a prior,” which is not a
crime).

RULING GRANTING PETITION FOR WRIT OF HABEAS CORPUS

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3 **PROOF OF SERVICE BY MAIL**

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5
6 Superior Court of the State of California } Case Number: 21W-0033A
7 County of Kings ss. }

8
9 I hereby declare under penalty of perjury that I am employed by the Kings County Superior
10 Court, over the age of eighteen (18) years, and not a party to the within action.

11 That on March 16, 2022 I served the RULING GRANTING PETITION FOR WRIT OF HABEAS
12 CORPUS by placing a true copy thereof, enclosed in a sealed envelope and deposited at my place of
13 business for collection and mailing with the United States mail at Hanford, California, following our
14 ordinary business practices with which I am readily familiar, addressed as follows:

15 **Kings County District Attorney**
16 **1400 W. Lacey Blvd.**
17 **Hanford, CA 93230**
18 **(Inter-Department Mailing)**

19 **Matthew Missakian**
20 **5150 E. Pacific Coast Hwy, Suite 200**
21 **Long Beach, CA 90804-3399**
22 **(matthew@missakian-law.com)**

23 **Audrey Barron**
24 **Swanson & McNamara, LLP**
25 **300 Montgomery St, Suite 1100**
26 **San Francisco, CA 94104**
27 **(audrey@smlp.law)**

28 **Mary McNamara**
Swanson & McNamara, LLP
300 Montgomery St, Suite 1100
San Francisco, CA 94104
(mary@smlp.law)

Executed on March 16, 2022, at Hanford, California.

Nocona Soboleski, Clerk of the Court

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By:  Deputy Clerk