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**CAPITAL CASE**

May 25, 2022

Honorable Jorge Navarrete  
Clerk, California Supreme Court  
350 McAllister Street  
San Francisco, CA 94102

Re: People v. Juan Villa Ramirez  
No. S099844  
Notice of New Authorities

Dear Mr. Navarrete,

Please bring to the Court's attention the following cases that have been decided since briefing was completed in the above-entitled case:

1. Argument I (errors related to failure to change venue) *People v. Peterson* (2020) 10 Cal.5th 409 (because case was the subject of such widespread media attention, it was not clear what purpose second change of venue would have served);
2. Arguments VII (appellant was prejudiced by admission of inflammatory and irrelevant gang evidence) *People v. Sanchez* (2016) 63 Cal. 4th 665 (case-specific out-of-court statements relied on by prosecution gang expert are inadmissible hearsay under California law and may also be testimonial and violate defendant's Sixth Amendment right to confrontation).

Best wishes to you. If you have any questions, please call or write.

Sincerely yours,

/s/

Michael Snedeker

Attorney for Appellant  
JUAN VILLA RAMIREZ

## DECLARATION OF ELECTRONIC SERVICE

Re: *People v. Juan Villa Ramirez*, Cal. Supreme Court No. S099844; Kern Co. Super Ct. No. SC076259A. I, the undersigned, declare that I am over 18 years of age, and not a party to the within cause; my business address is PMB 710, 2800 NE Lombard St., Portland, Oregon 97217. My electronic service address is [m.snedeker@comcast.net](mailto:m.snedeker@comcast.net). On May 25, 2022, I served a true copy of the attached

### LETTER RE NEW AUTHORITIES

on each of the following, by electronic mail, addressed as follows:

Heather Hardwick: [hhardwick@capsf.org](mailto:hhardwick@capsf.org)

Sean McCoy: [sean.mccoy@doj.ca.gov](mailto:sean.mccoy@doj.ca.gov)

California Appellate Project efilng: [filing@capsf.org](mailto:filing@capsf.org)

## DECLARATION OF SERVICE BY MAIL

Re: *People v. Juan Villa Ramirez*, Cal. Supreme Court No. S099844; Kern Co. Super Ct. No. SC076259A. I, the undersigned, declare that I am over 18 years of age, and not a party to the within cause; my business address is PMB 422, 4110 SE Hawthorne Blvd., Portland, Oregon 97214. My electronic service address is [m.snedeker@comcast.net](mailto:m.snedeker@comcast.net). On May 25, 2022, I served a true copy of the attached

### LETTER RE NEW AUTHORITIES

on each of the following, by placing same in an envelope (or envelopes) addressed as follows:

Juan Villa Ramirez  
T-24667  
CSP-SQ; 4 EY-16  
San Quentin, CA 94974

Clerk, Kern County Superior Court  
1415 Truxtun Ave.  
Bakersfield, CA 93301-5215.

Each said envelope was then, on May 25, 2022, sealed and deposited in the United States mail at Portland, Oregon, Multnomah County, the county in which I am employed, with the postage thereon fully prepaid. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 25, 2022, in Portland, Oregon.

\_\_\_\_\_/s/\_\_\_\_\_  
MICHAEL R. SNEDEKER

STATE OF CALIFORNIA  
Supreme Court of California

**PROOF OF SERVICE**

STATE OF CALIFORNIA  
Supreme Court of California

Case Name: **PEOPLE v. RAMIREZ (JUAN VILLA)**

Case Number: **S099844**

Lower Court Case Number:

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My email address used to e-serve: **m.snedeker@comcast.net**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
ADDITIONAL CITES FOR ORAL ARGUMENT	letter re new authorities May 25, 2022
ADDITIONAL CITES FOR ORAL ARGUMENT	letter re focus issues, May 25, 2022

Service Recipients:

Person Served	Email Address	Type	Date / Time
Sean Mccoy Office of the Attorney General 182516	sean.mccoy@doj.ca.gov	e-Serve	5/25/2022 5:13:06 PM
Attorney Attorney General - Sacramento Office Court Added	sacawtruefiling@doj.ca.gov	e-Serve	5/25/2022 5:13:06 PM
Lisa Short Snedeker, Smith & Short 88757	liselshort@comcast.net	e-Serve	5/25/2022 5:13:06 PM
Michael Snedeker Snedeker, Smith and Short 62842	m.snedeker@comcast.net	e-Serve	5/25/2022 5:13:06 PM

This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

5/25/2022

Date

/s/Michael Snedeker

Signature

Snedeker, Michael (62842)

Last Name, First Name (PNum)

Snedeker, Smith and Short

