



**ROB BONTA**  
**Attorney General**

**State of California**  
**DEPARTMENT OF JUSTICE**

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August 23, 2021

Jorge E. Navarrete  
Clerk and Executive Officer  
Supreme Court California  
350 McAllister Street  
San Francisco, CA 94102

RE: *The People of the State of California v. Frank Christopher Gonzalez*  
Supreme Court of California, Case No. S163643

Dear Mr. Navarrete:

The Court has requested that counsel advise the Court and opposing counsel of those issues on which counsel expects to focus at oral argument, calendared for September 9, 2021, at 1:00 p.m., in San Francisco. As counsel for respondent, I intend to focus on those issues raised by appellant and the Court at oral argument. Specifically, I will respond to the following issues on which appellant intends to focus:

Argument 1 (AOB 40-50): Appellant's argument that insufficient evidence supported his attempted robbery conviction;

Argument 3 (AOB 53-64): Appellant's argument that law enforcement obtained incriminating statements from him in violation of his Sixth Amendment right to counsel and due process;

Argument 7 (AOB 89-134): Appellant's argument that the trial court coerced witnesses by permitting the prosecution to use suggestive and leading questions;

Argument 8 (AOB 135-146): Appellant's argument that the trial court abused its discretion by limiting cross-examination of two witnesses; and

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Argument 12 (AOB 162-171): Appellant's argument that the trial court erred in admitting a videotape of victim impact evidence.

Sincerely,

*/s Lindsay Boyd*

LINDSAY BOYD  
Deputy Attorney General

For ROB BONTA  
Attorney General

LB:sf

DECLARATION OF ELECTRONIC SERVICE AND SERVICE BY U.S. MAIL

Case Name: *People v. Frank Christopher Gonzalez*

No.: S163643

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collecting and processing electronic and physical correspondence. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business. Correspondence that is submitted electronically is transmitted using the TrueFiling electronic filing system. Participants who are registered with TrueFiling will be served electronically. Participants in this case who are not registered with TrueFiling will receive hard copies of said correspondence through the mail via the United States Postal Service or a commercial carrier.

On August 23, 2021, I electronically served the attached RESPONSIVE FOCUS LETTER by transmitting a true copy via this Court's TrueFiling system. Because one or more of the participants in this case have not registered with the Court's TrueFiling system or are unable to receive electronic correspondence, on August 23, 2021, I have caused to be mailed a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 300 South Spring Street, Suite 1702, Los Angeles, CA 90013, addressed as follows:

The Honorable Mark C. Kim  
Judge  
Los Angeles County Superior Court  
South District  
Governor George Deukmejian  
Courthouse  
275 Magnolia Ave.  
Department S20  
Long Beach, CA 90802  
Service via US Mail

Glen Niemy  
Attorney for Appellant  
Service via Truefiling

Sonja Hardy  
Death Penalty Appeals Clerk  
Los Angeles County Superior Court  
Criminal Appeals Unit  
Clara Shortridge Foltz Criminal  
Justice Center  
210 West Temple Street, Room M-3  
Los Angeles, CA 90012  
Service via US Mail

Los Angeles County District  
Service via E-mail

The Honorable Pat Connolly  
Los Angeles County Superior Court  
Compton Courthouse  
200 West Compton Boulevard  
Department 012  
Compton, CA 90220  
Service via US Mail

California Appellate Project (SF)  
345 California Street  
Suite 1400  
San Francisco, California 94104  
Service via US Mail

Deidra Shannon  
Sr. Legal Analyst  
State Solicitor General's Office  
Legal Analyst  
State Solicitor General's Office  
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Sacramento, CA 95814  
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Maria Arvizo-Knight  
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Death Penalty Appeals Clerk  
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210 West Temple Street, Room M-3  
Los Angeles, CA 90012  
Service via US Mail

Legal Affairs Secretary  
Governor's Office of Legal Affairs  
State Capitol, Suite 1173  
Sacramento CA 95814

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on August 23, 2021, at Los Angeles, California.

Silvia Feigin

Declarant

*Is/Silvia Feigin*

Signature

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**STATE OF CALIFORNIA**  
Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
Supreme Court of California

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Case Name: **PEOPLE v. GONZALEZ (FRANK CHRISTOPHER)**

Case Number: **S163643**

Lower Court Case Number:

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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: **lindsay.boyd@doj.ca.gov**
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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.

8/23/2021

Date

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/s/Silvia Feigin

Signature

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Boyd, Lindsay (264670)

Last Name, First Name (PNum)

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CA Attorney General's Office - Los Angeles

Law Firm

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