

## Office of the State Public Defender

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October 24, 2019

Mr. Jorge Navarrete, Clerk  
Supreme Court of California  
350 McAllister St.  
San Francisco, CA 94102

Re: *People v. Jose Luis Leon*, Case No. S143531  
Oral Argument Focus Letter

Dear Mr. Navarrete:

I am counsel assigned to represent Mr. Leon in the above-referenced appeal, calendared for oral argument on November 5, 2019, at 1:30 p.m. I intend to focus my argument on the following issues (numbered as they appear in appellant's opening brief):

- I. Appellant's Statements to the Police Should Have Been Excluded at Trial Because he did not Knowingly and Intelligently Waive his *Miranda* Rights

Thank you for bringing this letter to the Court's attention.

Sincerely,

/s/ Andrea Asaro

Andrea Asaro  
Senior Deputy State Public Defender

## DECLARATION OF SERVICE

Case Name: *People v. Jose Luis Leon*  
Case Number: **Cal. Supreme Court No. S143531**  
**Riverside Co. Sup. Ct. No. RIF109916**

I, Alco C. Robinson, declare as follows: I am over the age of 18, not a party to this cause. I am employed in the county where the mailing took place. My business address is 1111 Broadway, 10th Floor, Oakland, California, 94607. I served a true copy of the following document(s):

### ORAL ARGUMENT FOCUS LETTER

by enclosing it in envelopes and placing the envelopes for collection and mailing on the date and at the place shown below following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

The envelopes were addressed and mailed on **October 24, 2019**, as follows:

Clerk of the Court for Honorable Christian F. Thierbach Riverside County Superior Court 4100 Main Street Riverside, CA 92501	Jose Luis Leon – CCR #F-26864 SPSQ 5-EB-86 San Quentin, CA 94974
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The following were served the aforementioned document(s) electronically via TrueFiling on **October 24, 2019**:

Kristen K. Chenelia  
Deputy Attorney General  
Attorney General's Office  
P.O. Box 85266  
San Diego, CA 92186  
[kristen.chenelia@doj.ca.gov](mailto:kristen.chenelia@doj.ca.gov)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Signed on **October 24, 2019**, at Oakland, California.

**/s/ ALCO ROBINSON**

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DECLARANT

STATE OF CALIFORNIA

**PROOF OF SERVICE**

STATE OF CALIFORNIA

Case Name: **PEOPLE v. LEON (JOSE LUIS)**

Case Number: **S143531**

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: **andrea.asaro@ospd.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
LETTER	Leon Focus Letter

Service Recipients:

Person Served	Email Address	Type	Date / Time
Andrea Asaro Office of the State Public Defender	andrea.asaro@ospd.ca.gov	e-Serve	
Office Of The Attorney Office Of The Attorney General Court Added	sdag.docketing@doj.ca.gov	e-Serve	
Attorney General - San Diego Attorney General - San Diego Office Kristen Chenelia, Deputy Attorney General	kristen.chenelia@doj.ca.gov	e-Serve	
Office Of The State Public Office Of The State Public Defender-Sac Timothy J. Foley, Sr. Deputy State Public Defender	docketing@ospd.ca.gov	e-Serve	

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.

Date

/s/Alco Robinson

Signature

Asaro, Andrea (107039)

Last Name, First Name (PNum)

Office of the State Public Defender

Law Firm