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In the Supreme Court of the State of California

In re ALBERT C., a Person Coming Under the Juvenile Court Law.

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff and Respondent,

v.

ALBERT C.,

Defendant and Appellant.

Case No. S231315

Second Appellate District, Division Five, Case No. B256480
Los Angeles County Superior Court, Case No. MJ21492
The Honorable Denise McLaughlin-Bennett, Judge

RESPONDENT'S ANSWER TO AMICUS CURIAE BRIEF

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INTRODUCTION

In this brief, the State responds to the amicus curiae brief filed on behalf of the Pacific Juvenile Defender Center, the First District Appellate Project, and the Los Angeles County Public Defender (collectively, "amici") in support of Defendant and Appellant Albert C. Amici repeat many of the arguments made in Albert's briefing, which the State addressed in its answer brief on the merits. The State will address the arguments that are new or different from those presented by Albert, referring to the answer brief on the merits ("RBOM") as appropriate.

Amici offer pointed criticism of the handling of this case, and of the juvenile justice system generally, but they do not establish that Albert suffered a due process violation under the controlling legal standard adopted in *Jackson v. Indiana* (1972) 406 U.S. 715 and *In re Davis* (1973) 8 Cal.3d 798. Nor do they identify any basis for adopting the constitutional presumption urged by Albert.

ARGUMENT

I. AMICI'S ARGUMENTS DO NOT ESTABLISH THAT ALBERT SUFFERED A DUE PROCESS VIOLATION

The first question before this Court is whether the juvenile court violated Albert's due process rights when, after finding him to be incompetent and suspending the delinquency proceedings against him, it kept him in custody while he received training aimed at helping him to attain competency. Amici acknowledge (Am. Br. 5-6) that this question is analyzed under the framework adopted in *Jackson* and *Davis*, which demands that the detention "must bear some reasonable relation to the purpose which originally justified the commitment." (*Davis*, *supra*, 8 Cal.3d at p. 805.) As the State explained in its answer brief on the merits, while the proceedings in this case were not perfect, the juvenile court's actions were consistent with the requirements of the Due Process Clause.

The juvenile court ensured that Albert received services aimed at restoring him to competency; closely monitored his case and reviewed reports from the competency trainer, psychiatrists, and others; pressed for more information on Albert's progress when it was not otherwise forthcoming; and frequently re-evaluated whether continued detention was appropriate, before ultimately finding Albert competent in February 2014. (See RBOM 16-30.)

Amici argue that Albert's detention was impermissible because the juvenile court found "that secure confinement in juvenile hall was not needed." (Am. Br. 7.) But that is not a complete or accurate characterization of the juvenile court's views on the subject. The court repeatedly noted that it was guided by dual considerations: it balanced its "concern about the safety of the community" against consideration of "the least restrictive means of detainment for the minor." (1 RT 44.) As the court explained, "I have to take both factors into consideration. I cannot make a finding based on one to the exclusion of the other." (*Ibid.*) On the one hand, the charges against Albert were "very serious in nature," involving the alleged "use of a weapon on the part of the minor" and "alleged acts of violence inflicted on individuals within the community" while Albert "was AWOL from dependency placement." (1 RT 52; see also CT 100 [probation report noting that Albert was AWOL for six months].) These circumstances gave rise to "a concern about the safety of the minor" and "the person and property of others" if Albert were released into the community. (1 RT 60.)[1] On the other hand, the court sought to place Albert in the "least restrictive" available setting that was compatible

[1] In light of these substantial safety concerns, it is not appropriate to analogize Albert's case to that of a typical foster youth in Los Angeles County. (See Am. Br. 11.)

with these safety concerns and that could offer him the competency services he needed. (See 1 RT 44, 76.) That is why the court ordered him to be screened for possible placement at a "level 14" facility (1 RT 44), a specialized group home for minors who are seriously emotionally disturbed (see Welf. & Inst. Code, § 11462.01; Am. Br. 8-9).[2] Level 14 facilities are less restrictive than juvenile hall, but are still "very restrictive." (Preis, *Advocacy for the Mental Health Needs of Children in California* (1998) 31 Loy. L.A. L. Rev. 937, 939, fn. 3.) Upon learning that Albert satisfied the criteria for a level 14 facility, the court ordered that the Probation Department and the Department of Children and Family Services work to obtain such a placement. (1 RT 52, 56-57; CT 116.) By concluding that placement in a level 14 facility, if available, was a preferable placement to juvenile hall, the court did not "concede[] that Albert did not need to be held in juvenile hall at all." (Am. Br. 7.) To the contrary, after evaluating the nature and seriousness of the charges against Albert, the court repeatedly found that he should remain in juvenile hall unless and until he could be placed in a level 14 facility. (See, e.g., 1 RT 26, 43-44, 52, 61-62.)

Amici are correct that Albert was never actually placed in a level 14 facility. (Am. Br. 9-10.) At least four such facilities refused to accept him due to safety concerns. (See 1 RT 99, 138.) Amici critique the handling of Albert's case, suggesting that local officials' efforts to place Albert in a level 14 facility were not sincere (Am. Br. 10), and that the court failed to consider other possible placement options (*id.* at pp. 11-12). Based on the State's review of the record, however, it appears that the juvenile court,

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[2] The court also explored the possibility of housing Albert in a "community detention program," but that proved infeasible. (See 1 RT 67; RBOM 8, fn. 6.)

counsel, and the local agencies involved worked in good faith to protect Albert's constitutional rights, to provide him with services to help him attain competency, and to try and obtain a less restrictive placement for him. A less restrictive placement was certainly a priority of the juvenile court, which told the parties that as soon as a level-14 placement became available, it would "put this matter back on calendar" that day, "and make the necessary orders to place [Albert] in level 14." (1 RT 76.) It is regrettable that Albert was never placed in such a facility, but that does not amount to a due process violation. Under the circumstances of this case, and given the legitimate safety concerns surrounding Albert, it was constitutionally permissible for the juvenile court to keep him detained in juvenile hall, on a temporary basis, while he received competency services.[3]

Next, amici criticize the training that Albert received for purposes of helping him attain competency. (Am. Br. 18-22.) The training consisted of weekly sessions in which a competency trainer, Nicco Gipson, instructed Albert on the 14 "domains" covered by the "Competency Assessment Instrument," and administered a written "mini test" after completing each domain. (1 RT 161-165.) In amici's view, that training was "meager" and the competency trainer was "inadequately trained" and "had absolutely no qualifications" to assess Albert. (Am. Br. 18, 22, 21.)[4] Gipson testified,

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[3] Amici rely on *In re Aline D.* (1975) 14 Cal.3d 557. (Am. Br. 10-11.) That case, which did not involve a minor who was found to be incompetent, is not on point. The minor in *Aline D.* had *already* been adjucated a ward of the juvenile court under section 602 (see *Aline D.*, *supra*, at pp. 559, 563), and this Court reversed the court's order committing her to the California Youth Authority, on the ground that she did not satisfy the statutory requirements specific to that type of commitment (see *id.* at pp. 562-563, discussing Welf. & Inst. Code, § 734).

[4] Without citation to the record, amici assert that, "[i]n the year Albert was in custody, he never did complete the full 20 weeks of

(continued...)

however, that she had been working as a competency trainer with young adults and juveniles for seven years. (1 RT 158-159.) After listening to her testify about her experience and the services she provided to Albert, a forensic psychiatrist opined that Albert had received "a lot of competency training." (1 RT 220; see *ibid.* ["[T]hat's a lot of training because we're not talking about nuclear physics, we're here simply talking about telling somebody what a public defender does versus what a district attorney does versus what a judge does."].)

Amici contend that the training Albert received compares unfavorably to Virginia's remediation program, which is "generally viewed as the best of the juvenile programs," and requires greater training for remediation counselors and more frequent sessions with clients. (Am. Br. 19-20.) From amici's description, it appears that the Virginia program is indeed more intensive than the competency training provided here, and perhaps that program can serve as a model for local service providers in California in future cases. Amici identify no authority, however, suggesting that if remediation services fall short of the "best" program in the Nation, that gives rise to a due process violation. Rather, the Constitution demands that the duration of an incompetent defendant's detention "must bear some reasonable relation to the purpose which originally justified" that detention.

(...continued)
remediation services proffered by probation." (Am. Br. 17.) That is incorrect. The record reflects that Albert began receiving training sessions "once a week for an hour and ½" beginning on May 9, 2013. (CT 106.) As of Nicco Gipson's testimony on February 4, 2014, those sessions had been continuing, "once a week," for "about eight months." (1 RT 161, 160.) The record shows that Albert missed two sessions "due to a dental appointment and a court appearance." (CT 99.) Assuming an average of four sessions per month, and deducting the two missed sessions, that amounts to approximately 30 weekly sessions.

(*Davis, supra*, 8 Cal.3d at p. 805.) Albert's detention—during which he participated in regular sessions with a trainer aimed at educating him on the concepts necessary for him to attain competency—satisfied that requirement.[5]

Amici also argue that Albert was denied due process because he was "detained without mental health services or medication trials directed at remediation." (Am. Br. 17.) The record in this case does not contain detailed descriptions of the mental health services Albert received during his time in juvenile hall, and does not indicate whether Albert received any medications during that period. As amici point out, however, the record does reflect that Albert had at least five contacts with mental health providers while he was in juvenile hall. (CT 173; see Am. Br. 29, fn. 21.) It might have been a better practice for the juvenile court to make a record on this subject (see RBOM 27), since there can be a relationship between a minor's mental health and his prospects for attaining competency (see

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[5] Experts in the field of providing competency remediation services to juveniles acknowledge that different jurisdictions follow different approaches, and that "there is little research" regarding "the efficacy" of those approaches. (Kruh & Grisso, Evaluation of Juveniles' Competence to Stand Trial (2009) pp. 191-192, 188.) A leading treatise suggests that the approach followed in this case, while perhaps not at the vanguard of the field, is not an outlier. In cases involving "[d]evelopmental immaturity," like this one, "efforts to improve the needed skills are likely to focus on some sort of education." (*Id.* at p. 191.) Authorities in a "number of jurisdictions have developed educational remediation curricula for juveniles that cover information similar to that in most functional [competency] interviews." (*Id.* at pp. 191-192.) Research suggests that "[b]rief interventions seem to be minimally effective" at improving understanding of key concepts, and "extended curricula . . . tend to focus on rote repetition that supports overlearning of 'facts' about the trial process and its participants." (*Id.* at p. 192.) Some have criticized that type of approach, and suggested "more sophisticated educational techniques," but those techniques "have not yet been studied." (*Ibid.*)

generally Kruh & Grisso, Evaluation of Juveniles' Competence to Stand Trial (2009) pp. 190-191). But the court's failure to do so did not violate Albert's due process rights. A trial court has "sound discretion in deciding whether, in a particular case, sufficient progress is being made to justify continued commitment pending trial." (*Davis*, 8 Cal.3d at p. 807.) The juvenile court here closely monitored Albert's case; reviewed reports from psychiatrists, the competency trainer, and the Regional Center; and monitored Albert's demeanor in the courtroom. (See RBOM 16-17, 19-23.) It acted within its discretion when it concluded, based on that information and the other circumstances regarding Albert and his case, that further remediation services in a secure setting were warranted. (See RBOM 23-24.)

One of the things that the juvenile court considered in weighing whether Albert should continue to receive remediation services was the March 2013 conclusion of Dr. Praveen Kambam that "there is a substantial probability that the minor will attain competency to stand trial in the next 12 months." (1 RT 74; see Dr. Praveen Kambam, M.D., letter to Donald Buddle, Deputy Public Defender, Mar. 17, 2013, p. 12 ("Kambam Report").)[6] Amici argue that Dr. Kambam's "statement is irrelevant to the issues" before this Court, because "it was made in his competence evaluation, long before the actual proceedings to determine the probability of Albert attaining competence." (Am. Br. 17.) The purpose of Dr. Kambam's report, however, was not just to assess Albert's competency to stand trial, but also to determine whether there was a substantial probability that he would attain competency in the foreseeable future. (See Kambam Report, *supra*, at p. 1.) Dr. Kambam's prediction about the length of time it

[6] As noted in the answer brief (RBOM 5, fn. 3), the Court of Appeal took judicial notice of Dr. Kambam's report.

would likely take Albert to attain competency was surely relevant to the juvenile court's determination about whether his continued commitment bore a reasonable relation to the purpose of helping Albert attain competency. (See *Davis*, *supra*, 8 Cal.3d at p. 805.)

Amici also argue that Dr. Kambam's 12-month prediction did not weigh in favor of continued treatment in a secure setting because "it was premised on Albert receiving mental health services and medication trials," and the "services Albert received fell far short of what Dr. Kambam recommended." (Am. Br. 18.) There is an obvious tension between that argument—which suggests that the court was required to ensure that every recommendation made by Dr. Kambam was followed—and amici's argument that Dr. Kambam's views were "irrelevant" because they were expressed in the context of evaluating Albert's competency. (*Id.* at p. 17.) As noted above, it might have been better for the juvenile court to inquire into the issue of mental health services on the record. But the Due Process Clause does not require a court to ensure that the treatment plan for an incompetent defendant mirrors the recommendations contained in an initial psychiatric evaluation in every respect. (See RBOM 27-28.) That is especially true where, as here, the record reflects that psychiatrists have arrived at different views concerning the status of the incompetent defendant. (Compare Kambam Report, *supra*, at p. 12 [suggesting that Albert might benefit from "ADHD medications"] with 1 RT 202 [Dr. Knapke's testimony that Albert did not "exhibit[] any signs of ADHD"].)

In amici's opinion, the length of the remediation process and "the failure to provide adequate services" combined to "ensure[] that Albert would not make progress toward remediation." (Am. Br. 28.) But that opinion does not square with the record. Even if one ignores the juvenile court's conclusion that Albert was exaggerating his lack of understanding (1 RT 248), and accepts amici's argument that he was not malingering

(Am. Br. 34), the record contains evidence that Albert did make progress toward competency during his detention. Indeed, his competency trainer testified that Albert had made progress over the course of their training sessions. (See RBOM 22-23; 1 RT 167-169, 180-181, 186, 192-193.) After hearing that testimony, Albert's counsel told the court that "there has been progress," conceding that the trainer's testimony "shows that some of the competency training is possibly working and [that Albert] has attained some domains of the competency training." (1 RT 239.)

Amici also discuss several decisions of the Court of Appeal (Am. Br. 14-16), but none of them supports Albert's position. Each of those decisions dealt with the implementation of Penal Code section 1370, which sets the procedures governing *adult* competency proceedings. Under that provision, when a trial court finds a defendant mentally incompetent to stand trial and orders the defendant committed to a state mental hospital, the medical director of that hospital has 90 days to "make a written report to the court . . . concerning the defendant's progress toward recovery of mental competence." (Pen. Code, § 1370, subd. (b)(1).) In *In re Mille* (2010) 182 Cal.App.4th 635, the court observed that for "this to occur, a defendant needs sufficient time at the state mental hospital to be duly evaluated, potentially to derive some benefit from the prescribed treatment, and for such progress to be reported to the court." (*Id.* at p. 650.) It held that it "was contrary to the statutory framework" for authorities to confine the defendant in jail for 84 days, and then transfer him to the hospital "with only six days remaining of the 90-day period," by which point there was "no meaningful opportunity [for him] to make progress" at the hospital or for the medical director "to document his progress in a court report." (*Id.* at p. 648.) In *In re Loveton* (2016) 244 Cal.App.4th 1025, the court upheld a trial court injunction requiring the transfer to take place within 60 days of the commitment order. (*Id.* at pp. 1028-1029; see also *People v. Bower*

(2015) 235 Cal.App.4th 122, 128-129 [vacating a similar order with a shorter timeframe based on a material change in the law].) In contrast to the defendants in those cases, Albert is a juvenile, and therefore was not subject to the requirements of Penal Code section 1370. No one is arguing that he should have been transferred to a mental hospital. And he received psychiatric assessments as well as competency training while he was detained in juvenile hall. More fundamentally, those decisions provide no support for finding a constitutional violation in Albert's case. While the Legislature may of course adopt specific time limits governing competency procedures as a matter of statutory law, the constitutional framework at issue in this case draws no such bright lines. (See, e.g., *Jackson*, *supra*, 406 U.S. at p. 738; *United States v. Magassouba* (2d Cir. 2006) 544 F.3d 387, 416.)

Ultimately, amici's arguments suggest that they believe *any* detention in juvenile hall for purposes of helping Albert attain competency, of any length, under any treatment plan, would have been inappropriate. For example, their position is that there "is no clear path for remediation" for an "adolescent defendant[] with symptoms of Attention-Deficit/Hyperactivity Disorder." (Am. Br. 22.) And they assert that "[e]ven in the best of circumstances, being held in a juvenile hall is inappropriate for the purpose of remediating youth who are incompetent to stand trial." (Am. Br. 27.)[7] Amici are entitled to hold those policy views and to advocate for them, but they do not provide a basis for granting relief to Albert in this case. The statute governing juvenile competency proceedings, Welfare and

[7] The Virginia program praised by amici includes minors who received competency services in a "juvenile detention center" and other restrictive facilities. (Warren et al., *Developing a Forensic Delivery System for Juveniles Adjudicated Incompetent to Stand Trial* (2009) 8 Int'l J. of Forensic Mental Health 245, 251.)

Institutions Code section 709, does not require automatic dismissal of charges upon evidence that an incompetent minor has been diagnosed with ADHD. And even the Los Angeles County Protocol, which amici praise, allows for the temporary detention of minors who are found incompetent, in juvenile hall, under appropriate circumstances.[8] Most relevant here, amici identify no authority finding a due process violation under the *Jackson* framework on facts comparable to those presented here—and the State is aware of none.

II. AMICI IDENTIFY NO SUPPORT FOR ADOPTING THE CONSTITUTIONAL PRESUMPTION URGED BY ALBERT

Amici offer two arguments in support of their position that a violation of the Los Angeles Protocol "is a presumptive violation of due process." (Am. Br. 35.) First, they defend the Protocol, noting that it was adopted "to implement Welfare and Institutions Code section 709" (*id.* at p. 34), arguing that it is a valid exercise of the juvenile court's authority (see *id.* at pp. 40-42), and asserting that the timelines in the Protocol are "in line with existing research" (*id.* at p. 43). These arguments do not support a rule holding that any violation of the Protocol's terms presumptively violates the Due Process Clause. As the State has recognized, the Los Angeles Protocol—like other protocols adopted by juvenile courts throughout the State—is a commendable effort to guide local judges and practitioners when they handle cases in this important area of the law. (See RBOM 31; see also Opn. p. 29 [the Protocol "provides a laudable goal"].) But the existence of a local protocol, designed to provide guidance and tailored to local conditions, does not establish that that any deviation from that

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[8] See Presiding Judge Michael Nash, Mem. to All Juvenile Delinquency Court Judicial Officers and All Interested Parties, Entities and Agencies, Jan. 9, 2012, p. 7 <http://www.courts.ca.gov/documents/LA-Competency-Protocol.pdf> [as of Oct. 27, 2016] ("Los Angeles Protocol").

protocol presumptively violates the federal or state Constitution. (See RBOM 34.) That is particularly true in the present context, where the courts have consistently recognized that "the Constitution itself draws no bright lines signaling when an incompetent defendant's continued detention to restore competency becomes unreasonable." (*Magassouba*, *supra*, 544 F.3d at p. 416; see *Jackson*, *supra*, 406 U.S. at p. 738; *Davis*, *supra*, 8 Cal.3d at p. 806, fn. 5.)

Second, amici offer a lengthy summary of the Court of Appeal's decision in *In re Jesus G.* (2013) 218 Cal.App.4th 157. (See Am. Br. 35-38.) That is the one case the State is aware of—in the 40 years since *Jackson* was decided—suggesting that it might be appropriate to incorporate a presumption into the *Jackson* framework. (See RBOM 34.) But *Jesus G.* failed to cite any authority or offer any persuasive explanation for its conclusion that "a violation of the Protocol is presumptively a violation of constitutional rights." (*Jesus G.*, *supra*, at p. 607.) The court merely asserted that this was so "[a]s a result" of its conclusion that the "Protocol complies with constitutional requirements." (*Ibid.*) Again, the fact that a local protocol or policy *complies* with the Constitution does not normally imply that any deviation from it presumptively *violates* the Constitution. (See RBOM 34.) And there is no basis for drawing such an inference in this case, involving an area of the law where the federal Supreme Court has acknowledged wide variation in local "facilities and procedures" and has declined to adopt specific time limits as a matter of constitutional law precisely because of the need to allow for that type of variation. (*Jackson*, *supra*, 406 U.S. at p. 738.)

III. MANY OF AMICI'S ARGUMENTS ADDRESS QUESTIONS THAT ARE NOT BEFORE THIS COURT

Amici also advance arguments about issues that are not presently before this Court. First, amici argue that the juvenile court erred when it

found that Albert was competent in February 2014. (See Am. Br. 29-34.) The Court of Appeal considered and rejected similar arguments. (Opn. pp. 20-23.) It concluded, based "on the totality of the evidence before" it, that "there was overwhelming evidence that [Albert] 'exaggerated' his answers to his own benefit—a polite way of stating he was feigning incompetence, just as minor's mother and grandmother had suggested early in the proceedings." (Opn. p. 21.) Although Albert raised several arguments related to the juvenile court's competency determination in his petition for review, this Court limited the issues when it granted that petition, and excluded the issues related to the competency determination. Given that limited grant of review, amici's arguments on this point are not relevant to the issues presently before the Court.[9]

Next, amici point to Welfare and Institutions Code section 631 as evidence that "California statutory law" contains specific time limits regarding detention that must be "strictly followed." (Am. Br. 13.) Section 631 requires minors who are taken into custody to "be released within 48 hours . . . unless within that period of time a petition to declare the minor a ward has been filed" in the juvenile court. (Welf. & Inst. Code, § 631, subd. (a); see Am. Br. 13-14.) It was complied with in this case.[10] But

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[9] In any event, as the Court of Appeal noted, there was considerable evidence supporting the juvenile court's finding of competence. That evidence included, for example, the testimony of Dr. Knapke that it was "probably likely that [Albert] does understand basic courtroom proceedings." (1 RT 233.)

[10] The detention at issue in this case began on February 12, 2013, at 1:00 p.m. (CT 57.) A delinquency petition to declare Albert a ward of the juvenile court under Welfare and Institutions Code section 602 had already been filed, more than seven months before. (CT 1.) A second petition was filed on February 14, 2013, at 10:22 a.m. (CT 51.) Amici also reference (Am. Br. 14) Welfare and Institutions Code section 632, regarding the

(continued...)

neither the Due Process Clause, nor California's statute governing juvenile competency procedures, imposes a specific time limit on the detention of juveniles who are found to be incompetent to stand trial. (See *Jackson*, *supra*, 406 U.S. at p. 738; Welf. & Inst. Code, § 709.) Instead, that type of detention is governed by the more flexible and case-specific framework adopted in *Jackson* and *Davis*.

Finally, amici criticize the juvenile detention system generally, citing a range of articles and studies for the argument that "protracted detention in a juvenile hall exacts lasting harm on young people." (Am. Br. 22; see *id.* at pp. 24-27.) Policies surrounding juvenile justice are matters of great importance to this State, and they deserve to be studied and debated thoroughly. But those general policy issues are beyond the scope of the present case.

(...continued)
timing of a minor's detention hearing, which was also complied with in this case (see 1 RT 13).

CONCLUSION

The Court of Appeal's judgment should be affirmed.

Dated: October 28, 2016

Respectfully submitted,

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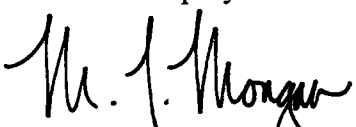

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CERTIFICATE OF COMPLIANCE

I certify that the attached Answer to Amicus Curiae Brief uses a 13 point Times New Roman font and contains 4,378 words.

Dated: October 28, 2016

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DECLARATION OF SERVICE BY U.S. MAIL

Case Name: ***In re Albert C. a Person Coming Under the Juvenile Court Law.***
No.: **S231315**

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 collection and processing of correspondence for mailing with the United States Postal Service. 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.

On October 28, 2016, I served the attached **RESPONDENT'S ANSWER TO AMICUS CURIAE BRIEF** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

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I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on October 28, 2016, at San Francisco, California.

Elza Moreira
Declarant

Signature