



CHARLES M. BONNEAU, Jr.

# SUPREME COURT COPY

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CSB No. 056583

December 14, 2015

HON. FRANK A. McGUIRE, Clerk  
California Supreme Court  
350 McAllister Street  
San Francisco, CA 94102

Re: People v. Rangel  
S076785

SUPREME COURT  
FILED

DEC 15 2015

Frank A. McGuire Clerk  
Deputy

Dear Mr. McGuire:

The following argument will be the focus of appellant's oral argument, to be delivered January 5, 2016, at 1:30 p.m. in San Francisco.

XI. THE TRIAL COURT ERRED BY FAILING TO CONSIDER A JURY INSTRUCTION ON ACCESSORY AS A LESSER-RELATED OFFENSE.

Appellant may address the related claims set forth in Argument VI [denial of confrontation by the use of out-of-court statements of appellant's son and his wife] and Argument IX [failure to instruct on accomplice testimony of appellant's son].

Respectfully submitted,

  
CHARLES M. BONNEAU, Jr.  
Attorney for Appellant

DEATH PENALTY

**CASE NAME:** PEOPLE v. RANGEL  
**CASE NO.:** S183606  
**COURT:** SUPREME COURT OF CALIFORNIA

PROOF OF SERVICE BY MAIL

I declare that I am employed in the County of Sacramento, California. I am over the age of eighteen years and not a party to the within cause; my business address is 331 J Street, Suite 200, Sacramento, CA 95814.

On the dated below I served the SUPPLEMENTAL AUTHORITIES and FOCUS LETTER on the parties in said cause, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Sacramento, California addressed as follows:

**NEOMA KENWOOD**  
**California Appellate Project**  
**101 Second Street Ste. 600**  
**San Francisco, CA 94105**

**Dep. Atty. Gen. MICHAEL DOLIDA**  
**P.O. Box 944255**  
**Sacramento, California 94244-2550**  
**[Attorney for Respondent]**

**PEDRO RANGEL, Jr. P-28501**  
**S.Q.S.P. 4-E-46**  
**San Quentin, CA 94974**

There is delivery by United States mail at each of the places so addressed, or there is regular communication by mail between the place of mailing and each of the places so addressed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on Dec. 14, 2016, at Sacramento, California.

