

SUPREME COURT COPY

RONALD F. TURNER
State Bar # 109452
321 High School Rd. NE Suite D3 PMB 124
Bainbridge Island, WA 98110
Telephone: (916) 396-6412

COT

SUPREME COURT
FILED

August 15, 2014

AUG 18 2014

Office of the Clerk
Supreme Court of California
350 McAllister Street
San Francisco, CA 94102
Attention: Mary Jameson, Deputy Clerk

Frank A. McGuire Clerk

Deputy

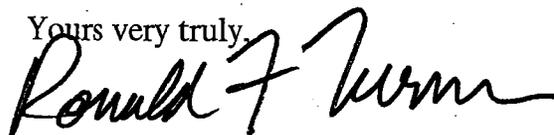
Re: *People v. Marcus Adams*, Crim. No. S118045
Oral Argument Focus Issues

Dear Ms. Jameson:

The above-entitled case is scheduled for Oral Argument on September 3, 2014. As appellate counsel, I expect to focus on the following two issues presented in Appellant's Opening Brief during oral argument:

- I. APPELLANT'S CONVICTIONS FOR MURDER MUST BE REVERSED BECAUSE THE PROSECUTION ELICITED "WITNESS INTIMIDATION" EVIDENCE AND ALLEGED THAT APPELLANT INTIMIDATED WITNESSES WITHOUT PRESENTING SUFFICIENT EVIDENCE THAT APPELLANT PERSONALLY ACTED TO INSTILL FEAR IN ANY WITNESS, OR DIRECTED OR AUTHORIZED OTHERS TO ATTEMPT TO INTIMIDATE ANY WITNESS.
- II. THE PROSECUTOR COMMITTED MISCONDUCT IN THE PENALTY PHASE BY ARGUING THAT APPELLANT'S MITIGATING EVIDENCE OF CHILDHOOD ABUSE BY HIS GRANDMOTHER WAS UNRELIABLE BECAUSE HIS SISTERS DID NOT TESTIFY TO THIS, WHERE THE PROSECUTOR KNEW THEY HAD CONFIRMED THIS ABUSE IN THE STARKEST TERMS.

Yours very truly,



RONALD F. TURNER
Attorney at Law

DEATH PENALTY

RECEIVED

AUG 18 2014

DECLARATION OF SERVICE BY MAIL

Case Name: *People v. Marcus Adams*

Case No.: S118045

I, Ronald Turner, declare that I am a citizen of the United States, over the age of 18 years and not a party to the within action; my business address is 321 High School Rd. NE Suite D3 PMB 124, Bainbridge Island, WA 98110.

On August 15, 2014, I served the attached

Oral Argument Focus Issues Letter

by placing a true copy thereof in an envelope addressed to the person named below at the address shown, and by sealing and depositing said envelope in the United States Mail at Elk Grove, California, with postage thereon fully prepaid. There is delivery service by United States Mail at the place so addressed, for there is regular communication by mail between the place of mailing and the place so addressed.

Colleen Tiedeman, D.A.G.
Office of the Attorney General
300 South Spring St., Suite 1702
Los Angeles, CA 90013

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

Executed on August 15, 2014, at Bainbridge Island, Washington..



Declarant