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DEPARTMENT OF JUSTICE



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# SUPREME COURT COPY

May 18, 2017

The Honorable Tani G. Cantil-Sakauye, Chief Justice  
and the Associate Justices of the Supreme Court of the State of California  
Supreme Court of the State of California  
350 McAllister Street  
San Francisco, CA 94102

RE: *People v. Kiongozi Jones* (CAPITAL CASE)  
California Supreme Court Case No. S075725  
Pre-Argument List of Additional Authorities

SUPREME COURT  
FILED  
MAY 19 2017  
Jorge Navarrete Clerk  
Deputy

Dear Chief Justice Cantil-Sakauye and the Associate Justices of the Supreme Court of the State of California:

At oral argument on May 30, 2017, respondent may discuss the following decisions, both of which were issued after the respondent's brief was filed in this case: *People v. Sanchez* (2016) 63 Cal.4th 665, 676-677 (discussing the distinction between "an expert's testimony regarding his general knowledge in his field of expertise" and "case-specific facts about which the expert has no independent knowledge"); and *People v. Hajek and Vo* (2014) 58 Cal.4th 1144, 1220 (agreeing with and applying *People v. Polk* (1996) 47 Cal.App.4th 944, to a claim that a tape-recorded conversation was inaudible and thus irrelevant), abrogated on another ground in *People v. Rangel* (2016) 62 Cal.4th 1192.

Respectfully submitted,

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# DEATH PENALTY

**DECLARATION OF SERVICE BY U.S. MAIL**

Case Name: **In re Kiongozi Jones, On Habeas Corpus.**

Case No.: **S218551**

I declare:

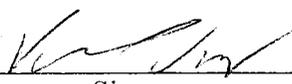
I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General 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 May 18, 2017, I served the attached **Letter** 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 300 South Spring Street, Suite 1702, Los Angeles, CA 90013, addressed as follows:

Geraldine S. Russell  
Attorney at Law  
P.O. Box 2160  
La Mesa, CA 91943-2160

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 May 18, 2017, at Los Angeles, California.

\_\_\_\_\_  
Vanida S. Sutthiphong  
Declarant

\_\_\_\_\_  
  
Signature