

COPY



KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE

110 WEST A STREET, SUITE 1100
SAN DIEGO, CA 92101
P.O. BOX 85266
SAN DIEGO, CA 92186-5266

Public: (619) 645-2001
Telephone: (619) 645-2038
Facsimile: (619) 645-2271
E-Mail: peter.quon@doj.ca.gov

SUPREME COURT COPY

April 1, 2015

Frank A. McGuire
Court Administrator and Clerk of the Supreme Court
Supreme Court of the State of California
350 McAllister Street
San Francisco, CA 94102-4797

SUPREME COURT
FILED

APR 02 2015

RE: *People v. Edward Charles, III*
Supreme Court of the State of California, Case No. S076337

Frank A. McGuire Clerk

Dear Mr. McGuire:

Deputy

Please inform the court the only additional authority respondent will rely upon at the April 8, 2015, oral argument in the above referenced case is:

People v. Dung Trinh (2014) 59 Cal.4th 216 (pertinent to Argument 6)

I apologize for the late delivery of this letter of additional authority. I have called appellant's counsel, Attorney Clayton Seaman, about this additional authority, and I have emailed him a copy of this letter.

Sincerely,

PETER QUON, JR.
Deputy Attorney General

For KAMALA D. HARRIS
Attorney General

PQ/
SD1999XS0002
71058270.doc

cc: R. Clayton Seaman, Jr.

DEATH PENALTY

DECLARATION OF SERVICE BY U.S. MAIL & ELECTRONIC SERVICE

Case Name: **People v. Edward Charles, III**

No.: **S076337**

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 that same day in the ordinary course of business.

On April 1, 2015, I served the attached **Letter re Additional Authority** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 110 West A Street, Suite 1100, P.O. Box 85266, San Diego, CA 92186-5266, addressed as follows:

R. Clayton Seaman, Jr.
Attorney at Law
P.O. Box 12008
Prescott, AZ 86304

Orange County District Attorney's Office
Appellate Division
401 Civic Center Drive West
Santa Ana, CA 92701

Counsel for Appellant Edward Charles, III
(2 copies)

County of Orange
Central Justice Center
Superior Court of California
700 Civic Center Drive West
Santa Ana, CA 92702-1994

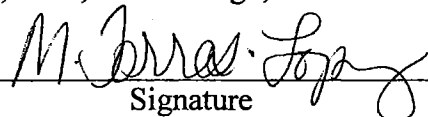
Michael G. Millman
Executive Director
California Appellate Project (SF)
101 Second Street, Suite 600
San Francisco, CA 94105

and, furthermore I declare, in compliance with California Rules of Court, rules 2.251(i)(1)(A)-(D) and 8.71 (f)(1)(A)-(D), I electronically served a copy of the above document on April 1, 2015 to Appellate Defenders, Inc.'s electronic service address eservice-criminal@adi-sandiego.com and to **R. Clayton Seaman**, Appellant's attorney's electronic service address by 5:00 p.m. on the close of business day at Tyger64@aol.com.

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 April 1, 2015, at San Diego, California.

M. Torres-Lopez

Declarant



Signature