

May 16, 2015

Ms. April Boelk,  
Automatic Appeals Unit Supervisor  
California Supreme Court  
350 McAllister Street  
San Francisco, CA 94102-4783

SUPREME COURT  
FILED

MAY 18 2015

Frank A. McGuire Clerk  

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Deputy

Re: S055856, People v. Romero and Self

Dear Ms. Boelk:

Please advise the Court that I intend to focus on the following issues during oral argument:

- (II) The biasing of the penalty determination because of California's lack of constraints on admission of victim-impact evidence and (III) the failure to instruct the jury as to the appropriate use of such evidence
- (VIII) Exclusion of evidence supporting the credibility of the main mitigation witness, particularly the relevance of the excluded testimony (VIII.C & the portion of VIII.D at AOB 404-405)

I also hope to touch on

- (V) The failure to sever charges brought only to prejudice the penalty choice, particularly the inflammatory nature and use of the material (V.B.4, V.D.2; also IV.B).
- (IX) Permitting the prosecutor to argue the extra-statutory and misleading aggravating factor of future dangerousness
- (I) The likelihood that any substantial error could have affected the penalty verdict.

Very truly yours,



Michael P. Goldstein,  
Attorney for Appellant Orlando Romero, Jr.

DEATH PENALTY

**PROOF OF SERVICE**

Re: People v. Romero and Self

No. S055856

I, Michael P. Goldstein, certify that I am not a party to the within cause; that my business address is P.O. Box 30192, Oakland, CA 94604; and that I served a true copy of the accompanying

**APPELLANT ROMERO'S FOCUS LETTER  
APPELLANT ROMERO'S REQUEST FOR 45 MINUTES' ARGUMENT**

on each of the following, by placing same in envelopes addressed respectively as follows:

Theodore Cropley  
Office of the Attorney General  
P.O. Box 85266  
San Diego, CA 92186-5266

John Grele  
1 Blackfield Dr # 158  
Tiburon, CA 94920

*W.D.*  
William D. Farber  
369-B Third St., #164  
San Rafael, CA 94901

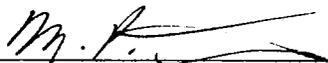
California Appellate Project (SF)  
101 Second Street, Suite 600  
San Francisco, CA 94105

Orlando G. Romero, Jr.  
(Appellant)

On May 16, 2015, I sealed and deposited each envelope in the United States Mail at Oakland, California, with the postage prepaid.

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

Signed on May 16, 2015, at Oakland, California

  
\_\_\_\_\_  
Michael Goldstein

**RECEIVED**  
**MAY 18 2015**  
**CLERK SUPREME COURT**