

IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff and Respondent,

v.

FRANCISCO BURGOS, et al.,

Defendants and Appellants.

No. S274743

Court of Appeal
Case No.
H045212

Santa Clara
County
Superior Court
Case
No.:C1518795

**APPELLANT DAMON STEVENSON'S ANSWER
TO THE PEOPLE'S PETITION FOR REVIEW**

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IN THE SUPREME COURT OF THE STATE OF CALIFORNIA

<p>PEOPLE OF THE STATE OF CALIFORNIA,</p> <p>Plaintiff and Respondent,</p> <p>v.</p> <p>FRANCISCO BURGOS, et al.,</p> <p>Defendants and Appellants.</p>	<p>No. _____</p> <p>Court of Appeal Case No. H038360</p> <p>Santa Clara County Superior Court Case No.:CC963902</p>
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ANSWER TO PETITION FOR REVIEW

TO THE HONORABLE TANI CANTIL-SAKAUYE, CHIEF JUSTICE,
AND TO THE HONORABLE ASSOCIATE JUSTICES OF THE
SUPREME COURT OF THE STATE OF CALIFORNIA:

On May 25, 2022, respondent petitioned this Court for review following the April 15, 2022, decision of the Court of Appeal, Sixth Appellate District, reversing appellant’s robbery convictions.

On June 10, 2022, co-appellant James Richardson filed an Answer to respondent’s petition for review. On June 13, 2022, co-appellant Francisco Burgos filed an Answer.

Pursuant to California Rules of Court, rules 8.500, subdivision (a)(2) and 8.504, subdivision (e)(3), appellant Damon Stevenson joins co-appellant Richardson’s Answer requesting denial of review. In the event this Court grants review, appellant Stevenson respectfully requests that this Court also consider whether sufficient evidence supports a finding that he participated in or aided and abetted the robberies.

STATEMENT OF ADDITIONAL ISSUES

Does a defendant's mere presence during a robbery by fellow gang members support a reasonable inference that he intended to "participate in a 'show of force' as one member of the larger group" such that a reasonable jury could find beyond a reasonable doubt that he aided and abetted robbery?

STATEMENT OF THE CASE AND FACTS

The Court of Appeal accurately summarized the case's procedural history and facts. Appellant Stevenson offers the following summary to pinpoint his evidentiary challenge.

Danny Rodriguez and Gabriel Cortez encountered four to six men while walking home from a restaurant. After asking where they were from and if they "bang," one of the men displayed a firearm while others took their cell phones and Mr. Cortez's wallet.

A "find my phone" application led officers to a nearby apartment complex, where one phone was found in Lozano's girlfriend's car, and the other in a child's backpack in Gregory Byrd's apartment, where Lozano, Burgos, Richardson and Stevenson were also present. Surveillance video showed Burgos, Richardson, Lozano and Stevenson left a 7-Eleven nearby shortly before the robbery.

Both Mr. Rodriguez and Mr. Cortez stated that appellant Stevenson was present during the robbery but did nothing. A gang expert testified that Gregory Byrd and appellants Stevenson, Burgos, Richardson and Lozano are members of Crip gang subsets, who are expected to back up fellow members in committing crimes. No evidence indicated that appellant Stevenson did anything besides stand by during the robbery.

ARGUMENT

I.

THIS COURT SHOULD DENY REVIEW ON THE ISSUE OF PENAL CODE SECTION 1109'S RETROACTIVITY

Appellant Stevenson joins co-appellant Richardson's Argument I incorporated herein. (Cal. Rules of Ct., rule 8.504, subd. (e)(3).)

II.

IF THIS COURT GRANTS REVIEW, APPELLANT STEVENSON REQUESTS THAT IT ALSO CONSIDER WHETHER MERE PRESENCE WITH FELLOW GANG MEMBERS BEFORE, DURING AND AFTER A ROBBERY CAN SUPPORT A FINDING BEYOND A REASONABLE DOUBT OF INTENT TO AID AND ABET THE ROBBERY

Every crime requires some action with criminal intent. While companionship before, during and after the crime is relevant to determine whether a defendant aided and abetted a crime, mere presence and failure to prevent a crime are not sufficient to sustain a conviction.

Here, nothing linked appellant Stevenson to the robbery of Mr. Rodriguez and Mr. Cortez besides his presence. There was no evidence that he made any movement, gesture, statement or facial expression; he was merely present. Thus, the evidence fails to support either direct participation or aiding and abetting.

The Court of Appeal held a reasonable jury could infer guilt based on two facts: (1) Stevenson's continuous presence with the group before, during and after the robbery; and (2) his gang membership coupled with the gang expert's testimony that membership includes "a tacit agreement to . . . join in on acts of violence." (Ex. A at 9.)

Appellant contends that this evidence fails to meet the constitutional threshold necessary to support conviction beyond a reasonable doubt.

A. Standard of Review

Both federal and state constitutional law require the state to prove beyond a reasonable doubt every elemental fact necessary to establish a criminal offense. (U.S. Const., Am. XIV; Cal. Const. art. 1, § 15; *People v. Breverman* (1998) 19 Cal.4th 142, 190.) To be sufficient, evidence supporting the conviction must be “substantial,” i.e., “evidence that is reasonable, credible, and of solid value [] such that a reasonable trier of fact could find [the element] beyond a reasonable doubt.” (*People v. Johnson* (1980) 26 Cal.3d 557, 578; *Jackson v. Virginia* (1979) 443 U.S. 307, 317-320; *People v. Rodriguez* (1999) 20 Cal.4th 1, 11.)

The reasonable-doubt standard does not permit conviction upon probabilities. (*People v. Redmond* (1969) 71 Cal.2d 745, 755; *People v. Williams* (1971) 5 Cal.3d 211, 216-217.) The “trier of fact must be reasonably persuaded to a near certainty.” (*People v. Redmond, supra*, 71 Cal.2d at p. 756 [conviction reversed because victim’s identification was tentative].)

There must be affirmative evidence to show guilt. (*People v. Clark* (1968) 251 Cal.App.2d 868, 874 [auto theft conviction reversed because prosecution presented no evidence that defendant, a passenger in the car, knew it was stolen].) In assessing the sufficiency of the evidence, the reviewing court evaluates the entire record, not just isolated bits favoring either side. (*People v. Johnson, supra*, 26 Cal.3d at pp. 576-577 [the court does not “limit its review to the evidence favorable to respondent].)

When the facts are not in dispute, the reviewing court reviews related issues de novo. (*Ghirardo v. Antonioli* (1994) 8 Cal.4th 791, 799.) Whether a particular inference can be drawn from the evidence is a question of law. (*People v. Romo* (1990) 220 Cal.App.3d 514, 519.)

B. Aiding and Abetting

A person who does not directly commit a crime is nevertheless liable if he or she intentionally assists the perpetrator. (*People v. Miranda* (2011) 192 Cal.App.4th 398, 407.) To prove aider-abettor liability, the people must show: (1) knowledge of the perpetrator's unlawful purpose; (2) intent to aid or encourage commission of the offense; and (3) an action or word that actually aids or encourages commission of the offense. (*People v. Beeman* (1984) 35 Cal.3d 547, 561.)

Companionship and conduct before, during and after the offense are relevant factors in determining whether a defendant aided and abetted a crime. (*People v. Miranda, supra*, 192 Cal.App.4th at p. 407.) However, mere presence and/or failure to prevent the crime are not sufficient to sustain a conviction. (*People v. Nguyen* (1993) 21 Cal.App.4th 518, 529-530.) Mere knowledge of another's criminal purpose alone does not trigger liability. (*Id.*, at p. 530, 532.)

Aiding and abetting may occur on the "spur of the moment." (*Id.*, at p. 532.) However, the defendant must act with intention to aid or encourage the crime before it is completed. (*In re Malcom M.* (2007) 147 Cal.App.4th 157, 169-170.) Aid rendered only after a crime is completed creates liability as an accessory, not a principle. (*Ibid.*)

C. Facts and Legal Theory

1. Circumstantial Evidence

The robbery occurred on the street in between a 7-Eleven (4 CT 1129, 1146), where Stevenson was filmed with Richardson, Lozano and Burgos twenty minutes before (Ex. #7; 29 RT 8420-8427), and an apartment complex (22 RT 6367-6369), where Stevenson was located (again in the company of Richardson, Lozano and Burgos), as well as one of the stolen cell phones stashed in a child's backpack (24 RT 6948-6950, 6960-6961; 25 RT 7234; 26 RT 7513). The other stolen cell phone was located in Lozano's girlfriend's car and bore Lozano's fingerprint. (25 RT 7350-7352; 29 RT 8490; 34 RT 9930; 40 RT 11742.)

Thus, it appears that the four men were at least present during the robbery. At some point during or after the robbery, Mr. Lozano received Mr. Rodriguez's phone. Someone placed Mr. Cortez's phone in the child's backpack in Mr. Byrd's apartment, but no evidence pointed to whom. Byrd, Lozano and appellant have children, but the owner of the child's backpack was not identified.

2. Direct Evidence

Both Rodriguez and Cortez feigned memory lapses at trial and were impeached with their prior statements at the in-field show ups. (22 RT 6357-6358; 25 RT 7225-7228, 7250.) Mr. Rodriguez initially identified Mr. Stevenson, who "was present . . . but [did] nothing[;] [h]e was just standing there." (4 CT 1163; 28 RT 8138-8139, 8197.) However, after he saw Mr. Burgos, he lost confidence in his prior identification, because the suspects both had braided hair. (4 CT 1164-1165; 28 RT 8139.) The result of Mr. Rodriguez's identification was that, if Mr. Stevenson was present at all, he did nothing.

Mr. Cortez also identified Mr. Stevenson as “part of the group,” but that that “he was just there.” (4 CT 1179-1180.)

3. General Gang Habits and Expectations

Investigator Whittington testified that Crips gang members are expected to “[p]ut in work, be loyal, spread the name, and don’t back down.” (34 RT 9960.) “Putting in work” means committing criminal acts. (34 RT 9961.) Failure to “comply with the general expectations” would result in a member being “disciplined, basically removed from the gang, or assaulted.” (34 RT 9961.) “[I]f another Crip gang member is actively committing a crime,” fellow members are “going to join in and assist.” (34 RT 9967.) “[P]ossible consequences of a Crip gang member . . . failing to actively take part” include not being “a Crip gang member much longer.” (34 RT 9967.)

4. Argument

The prosecutor linked Mr. Stevenson with the crime by virtue of his presence with the group before and after the event. (46 RT 13532.) However, he also misquoted the evidence, arguing that Stevenson “went inside Mr. Cortez’s pockets.” (46 RT 13534.) In any event, he characterized passive presence as providing fear.

[A]nd mind you, ladies and gentlemen, all four or five of these individuals are surrounding these two men at the same time and they’re both – and they’re all coordinating to take property out of their pockets. The fear is related to those individuals individually and collectively.

(46 RT 13535.) Defense counsel argued that Stevenson was not described as having done anything. (46 RT 13592-13596.)

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D. The Evidence Does Not Support a Finding that Stevenson Intentionally Contributed to the Crime

Substantial evidence supports only a finding that Stevenson was present during the offense, but not that he did anything to participate in or aid the robbery.

There was no evidence that the group conspired to commit a robbery, which was apparently a spontaneous decision by the “main guy” after they happened upon Rodriguez and Cortez. Rodriguez and Cortez stated they happened to be walking in the same direction, the group having just left the 7-Eleven and Rodriguez and Cortez having just left the Lee Noodle house next door. (4 CT 1129, 1146.) It seemed like they were going to let them pass, but then one man initiated a robbery. (4 CT 1130.)

No one described any subsequent word or action by Stevenson, let alone a word or action that would support an inference that he intended to aid and abet the robbery. Stevenson was identified as present but doing nothing. (4 CT 1180-1181.) Moreover, no physical evidence connected him to the robbery – none of the stolen property was on his person or bore his fingerprint or DNA.

While Stevenson’s presence may have intimidated the victims, as the prosecutor argued, nothing implies his intent to do so. The victims’ state of mind is not circumstantial evidence of Stevenson’s intent. For example, there was no testimony that the group “surrounded” Rodriguez and Cortez, or that Stevenson took an intimidating stance or even bore a menacing expression. Stevenson cannot be liable for *unintentional* intimidation.

The Court of Appeal relied on three cases as supportive of the robbery finding: *In re Juan G.* (2003) 112 Cal.App.4th 1, *In re*

Lynette G. (1976) 54 Cal.App.3d 1087, and *People v. Campbell* (1994) 25 Cal.App.4th 402. (Ex. A at 9.) Appellant contends that *Juan G.* and *Campbell* are demonstrably different. The facts of *Lynette G.* are more analogous, but appellant contends the dissenting justice correctly opined that “no reasonable trier of fact could have found that the prosecution had sustained its burden of proving beyond a reasonable doubt that *Lynette G.* had committed robbery.” (*In re Lynette G., supra*, 54 Cal.App.3d at p. 1102, dis. opn. of Jefferson, J.)

In *In re Juan G.*, 112 Cal.App.4th 1, two minors approached the victim. Quincy D. displayed a knife and demanded money; Juan G. approached with Quincy D. and stood next to him, close enough to touch the victim, who felt threatened by him. (*In re Juan D., supra*, at p. 3.) After Quincy D. obtained the money, both “fled,” running through a parking lot and over a wall. (*Id.*, at pp. 3-4.) The Court of Appeal upheld the robbery finding because Juan G. approached with Quincy D., stood beside him, touching distance to the victim, and then fled with Quincy D. (*Id.*, at p. 5.)

Thus, two boys both purposefully approached the victim, Juan G. stood close enough to touch the victim, and the boys ran off together. Here, several men were walking back from 7-Eleven and happened upon Rodriguez and Cortez. There is no evidence of a preplanned approach. The victims stated that Stevenson did “nothing;” there was no evidence that he stood close enough to touch them. Finally, Stevenson did not “run away” with the group; the victims fled. His presence later is not compelling; also present were Mr. Hames, who was not charged, and Mr. Byrd, who was positively identified as the gunman but acquitted.

In *People v. Campbell, supra*, 25 Cal.App.4th 402, Smith and Campbell walked by a couple at 1 a.m.; a few minutes later they returned and approached. (*Id.*, at p. 406.) Campbell announced a “robbery” then chased and fired on the man as he ran away. (*Ibid.*) Smith then grabbed the woman and asked what she had. (*Id.*, at p. 407.) When she replied that she had nothing but her earrings, he dragged her away and raped her. (*Ibid.*)

The Court of Appeal found sufficient evidence that Smith aided Campbell’s attempted robbery based on the fact that they both passed and then returned to stand close by the couple, reasonably implying a common purpose. (*Id.*, at p. 409.) Smith exhibited no surprise or fear by the robbery, and in fact tried to rob the woman afterward. (*Id.*, at pp. 409-410.)

Here, on the other hand, there was no such concerted approach after an initial “casing” of the situation to suggest a common purpose. Moreover, Smith, unlike Stevenson, actively tried to rob the second victim, seriously undermining his claim that he was not “in on” Campbell’s robbery attempt of the first victim. Stevenson committed no crime, uttered no word of encouragement, and took no action to assist in the robbery.

In *In re Lynette G., supra*, 54 Cal.App.3d 1087, three minor girls “huddled together five feet away” as another minor girl whacked a woman in the head and took her property. (*Id.*, at pp. 1090-1091.) All four girls ran away together. (*Id.*, at p. 1091.) Men who chased them saw two of the girls fighting over the property. (*Ibid.*) Officers later found the four girls, including Lynette G., walking in the area. (*Ibid.*)

The Court of Appeal upheld the robbery finding because Lynette G. was both present for the crime and fled with the assailant. (*Id.*, at p. 1095.) However, one Justice dissented, stating “to sustain an adjudication by the juvenile court that Lynette G. committed a robbery . . . is to accept the theory of ‘guilt by association.’” (*Id.*, at pp. 1095-1096, dis. opn. of Jefferson, J.)

The girls’ behavior distinguishes *Lynette G.* from this case. Stevenson did not wait in the wings during, or run off with the group after, the robbery. He was merely with the group moving from point A (7-Eleven) to point B (the apartment). In any event, appellant contends that the dissenting justice got it right: insufficient evidence supported a finding that Lynette G. aided and abetted the robbery.

Lynette G. simply stood by as one of her friends committed the criminal act and then ran off with the group afterward. While not principled, her conduct was not criminal: it did not assist the robbery whatsoever. She lent no word or action to encourage or aid the crime. The victim did not even notice Lynette G. until after her property had been taken, and then all she saw was her “huddling” at a distance.

These actions do not reasonably support aiding and abetting the crime. As the Court in *Campbell* emphasized:

[I]n general neither presence at the scene of a crime nor knowledge of, but failure to prevent it, is sufficient to establish aiding and abetting its commission.

(*People v. Campbell, supra*, 25 Cal.App.4th at p. 409.) Even her act of fleeing with the other girls does not tip the balance. There was no evidence that she did anything to facilitate the crime, only speculation, which does not support proof beyond a reasonable doubt. The facts of *Lynette G.* do not support a finding of robbery, and this Court is not

bound to follow it. (*Auto Equity Sales, Inc. v. Superior Court* (1962) 57 Cal.2d 450, 455-456.)

Investigator Whittington's expert opinion that gang members generally must assist their comrades in criminal activity cannot fill the evidentiary gap. Expert testimony is meant to explain a defendant's actions, not become a substitute for them. (*People v. Sanchez* (2016) 63 Cal.4th 665, 699 [general expert testimony that independent drug sales in gang territory risked retaliation did not support inference that defendant acted on behalf of gang].) The jurors cannot presume that appellant assisted because that's what gang members generally do; the evidence must show that he *did* assist.

Secondly, the argument calls for inadmissible propensity evidence, i.e., Stevenson must have participated because that's what gang members do. (*People v. Avitia* (2005) 127 Cal.App.4th 185, 192 [gang evidence not admissible as character evidence].) The law does not permit gang members to become strictly liable for any crime committed by fellow gang members in their presence by virtue of a purported gang code that they are obligated to participate, whether they actually participate or not. (*People v. Leon* (2008) 161 Cal.App.4th 149,159 [mere commission of burglary with fellow gang member was not sufficient evidence of aiding and abetting witness intimidation].)

In finding prejudice from admission of the gang evidence at trial, the Court of Appeal acknowledged, "there was no clear evidence that Stevenson actually did anything during the robbery apart from being present." (Ex. A at 20-21.) Stevenson cannot be liable for robbery simply on the basis of his presence and common gang membership. Insufficient evidence supported a criminal act or intent.

CONCLUSION

Appellant requests that this Court deny review. However, in the event this Court grants review, appellant requests that this Court also consider whether evidence of mere presence and gang membership supports a finding beyond a reasonable doubt that he aided and abetted the robberies.

Dated: June 13, 2022

Respectfully submitted,

Jean M. Marinovich

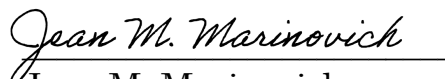
Jean M. Marinovich
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Attorney at Law
Attorney for Appellant Stevenson

CERTIFICATE OF COMPLIANCE
(Cal. Rules of Ct., rule 8.504(d)(1))

Case Name: *People v. Burgos, et al. (Stevenson)* No.: H045212

I, Jean M. Marinovich, certify pursuant to rule 8.504(d)(1) of the California Rules of Court that this brief was produced on a computer and contains 3,192 words, as calculated by the word count of the Word program. This brief therefore complies with the rule, which limits a brief produced on a computer to 8,400 words.

Dated: June 13, 2022



Jean M. Marinovich
Attorney for Appellant

DECLARATION OF SERVICE

Case Name: *People v. Burgos, et al. (Stevenson)*

No.: H045212

I, the undersigned, declare as follows:

I am an active member of the State Bar of California, #157848, and not a party to the within action; my business address is 17539 Vierra Canyon Rd. #283, Salinas, California, 93907.

On June 13, 2022, I served the attached

APPELLANT’S ANSWER TO PETITION FOR REVIEW

By placing a true copy thereof in an envelope addressed to the persons named below at the addresses shown, and by sealing and depositing the envelope in the United States Mail at Salinas, California, with postage thereon fully prepaid.

Damon Stevenson #BE5570 Bldg 2 cell 146 P.O. Box 4000 (CSP-Solano) Vacaville, CA 95696	Santa Clara County Superior Court Appeals Department 191 N. First Street San Jose, CA 95113
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and on each of the following, by personally e-filing a .pdf version of the document to the court and parties named below at the web addresses shown:

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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 June 13, 2022, at Salinas, California.

Jean M. Marinovich
Declarant

Jean M. Marinovich
Signature

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. BURGOS**
Case Number: **S274743**
Lower Court Case Number: **H045212**

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