

ROB BONTA
Attorney General

State of California
DEPARTMENT OF JUSTICE



1300 I STREET, SUITE 125
P.O. BOX 944255
SACRAMENTO, CA 94244-2550

Public: (916) 445-9555
Telephone: (916) 210-7661
Facsimile: (916) 324-2960
E-Mail: Christopher.Rench@doj.ca.gov

September 15, 2022

Jorge E. Navarrete
Clerk and Executive Officer
Supreme Court of the State of California
350 McAllister Street
San Francisco, CA 94102-4797

RE: *People v. Tacardon*, No. S264219

Dear Mr. Navarrete:

The People wish to advise the Court of the following supplemental authority that was not available at the time briefing was completed: 1.) *United States v. Campbell-Martin* (8th Cir. 2021) 17 F.4th 807; and 2.) *United States v. Tafuna* (10th Cir. 2021) 5 F.4th 1197.

Sincerely,

/S/ CHRISTOPHER J. RENCH

CHRISTOPHER J. RENCH
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

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

Case Name: ***People v. Tacardon***

No.: **S264219**

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 collecting and processing electronic and physical correspondence. 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. Correspondence that is submitted electronically is transmitted using the TrueFiling electronic filing system. Participants who are registered with TrueFiling will be served electronically. Participants in this case who are not registered with TrueFiling will receive hard copies of said correspondence through the mail via the United States Postal Service or a commercial carrier.

On September 15, 2022, I electronically served the attached **SUPPLEMENTAL AUTHORITIES LETTER** by transmitting a true copy via this Court's TrueFiling system.

I declare under penalty of perjury under the laws of the State of California, and the United States of America the foregoing is true and correct and that this declaration was executed on September 15, 2022, at Sacramento, California.

C. Allen

Declarant for eFiling

/S/ C. Allen

Signature

Because one or more of the participants in this case have not registered with the Court's TrueFiling system or are unable to receive electronic correspondence, on September 15, 2022, a true copy thereof enclosed in a sealed envelope has been placed in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Paul Kleven
Law Office of Paul Kleven
1604 Solano Avenue
Berkeley, CA 94707
“(1) Courtesy Copy for Counsel’s Client”

The Honorable Tori Verber Salazar
San Joaquin Co. District Attorney
222 East Weber Avenue
Stockton, CA 95202

Clerk of the Superior Court
San Joaquin County
180 E. Weber Avenue, Suite 202
Stockton, CA 95202

Court of Appeal, Third Appellate District
[served via Truefiling]

I declare under penalty of perjury under the laws of the State of California, and the United States of America the foregoing is true and correct and that this declaration was executed on September 15, 2022, at Sacramento, California.

T. Sabella
Declarant for U.S. Mail

/S/ T. Sabella
Signature

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. TACARDON**
Case Number: **S264219**
Lower Court Case Number: **C087681**

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My email address used to e-serve: **Christopher.Rench@doj.ca.gov**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
LETTER	Tacardon Supplemental Auth Ltr

Service Recipients:

Person Served	Email Address	Type	Date / Time
Christopher Rench Office of the Attorney General 242001	Christopher.Rench@doj.ca.gov	e-Serve	9/15/2022 9:30:57 AM
Paul Kleven Law Office of Paul Kleven 95338	PKleven@Klevenlaw.com	e-Serve	9/15/2022 9:30:57 AM

This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

9/15/2022

Date

/s/Carolyn Allen

Signature

Rench, Christopher (242001)

Last Name, First Name (PNum)

DOJ Sacramento/Fresno AWT Crim

Law Firm