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DEPARTMENT OF JUSTICE



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October 30, 2023

The Honorable Jorge E. Navarrete
Court Administrator and Clerk
Supreme Court of the State of California
350 McAllister Street
San Francisco, CA 94102

RE: *People v. Glen T. Helzer*
Contra Costa County Superior Court No. 3-196018-6
Supreme Court of the State of California, Case No. S132256
Respondent's Oral Argument Focus Letter

Dear Mr. Navarrete:

We write to advise the Court that we expect our argument in this case will focus on the issues raised by opposing counsel in their respective focus letter, specifically:

Claim I: "Appellant's motion to suppress all evidence obtained from the search of his home should have been granted due to the searching officers' flagrant disregard for the terms of the authorizing warrants and the prosecutor's failure to show that all of that evidence was legally seized"

Claim III: "The denial of the right to ask venire members if they could consider mitigating factors after exposure to the horrifying corpse desecration evidence the court allowed the prosecutor to present violated appellant's right to due process and an impartial jury".

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Respondent will also be prepared to address any other issues on which the Court has questions.

Respectfully submitted,

/s/ Sarah J. Farhat
SARAH J. FARHAT
Deputy Attorney General
State Bar No. 228179

For ROB BONTA
Attorney General

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

Case Name: **People v. Glen T. Helzer**
No.: **S132256**

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 October 30, 2023, I electronically served the attached **Respondent's Oral Argument Focus Letter** by transmitting a true copy via this Court's TrueFiling system. 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 October 30, 2023, I placed a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

Jeanne Keevan-Lynch
Attorney at Law
JKL@MYWORD.WS

CAP - SF
California Appellate Project (SF)
filing@capsf.org

The Honorable Diana Becton
District Attorney
Contra Costa County District Attorney's
appellate.pleadings@contra costada.org

County of Contra Costa
Wakefield Taylor Courthouse
Superior Court of California
725 Court Street
Martinez, CA 94553-1233
(via U.S. mail)

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 October 30, 2023, at San Francisco, California.

B. Wong
Declarant

/s/ B. Wong
Signature

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. HELZER (GLEN TAYLOR)**

Case Number: **S132256**

Lower Court Case Number:

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10/30/2023

Date

/s/Beverly Wong

Signature

Farhat, Sarah (228179)

Last Name, First Name (PNum)

California Dept of Justice, Office of the Attorney General

Law Firm