SUPREME COURT OF CALIFORNIA
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Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 4/25/2019 by April Boelk, Deputy Clerk

LAW OFFICE OF
KATHY R. MORENO
P. O. Box 9006
Berkeley, CA 94709
(510) 717-2097

April 25, 2019

Office of the Clerk, California Supreme Court
ATTN: Jorge Navarrete, Clerk & Executive Officer
ATTN: April Boelk, Automatic Appeals Supervisor
350 McAllister Street, Room 1295
San Francisco, CA 94102

RE: People v. Jeffrey Scott Young - S148462
Focus Letter for Oral Argument

Dear Clerk:

Pursuant to the Court's request, I submit the following list of arguments I intend to focus on in oral argument May 8, 2019 in the above-entitled case.

Argument II
THE TRIAL COURT ERRED IN ADMITTING EVIDENCE OF APPELLANT'S TATTOOS, HIS USE OF RED SHOE LACES, AND HIS WHITE SUPREMACY BELIEFS, IN VIOLATION OF APPELLANT'S SIXTH, EIGHTH AND FOURTEENTH AMENDMENT RIGHTS TO DUE PROCESS AND A FAIR GUILT TRIAL

Argument VIII
THE TRIAL COURT VIOLATED APPELLANT'S FIRST, SIXTH, EIGHTH AND FOURTEENTH AMENDMENT
RIGHTS TO FREE SPEECH AND ASSOCIATION, TO A FAIR TRIAL AND DUE PROCESS, AND TO A RELIABLE SENTENCING PROCEEDING BY ALLOWING THE JURY TO CONSIDER APPELLANT'S RACIST/NAZI TATTOOS AND WHITE SUPREMACY /SKINHEAD BELIEFS AT PENALTY PHASE

Argument IX
THE ADMISSION OF VICTIM IMPACT EVIDENCE ON FACTOR (B) CRIMES VIOLATED APPELLANT'S FEDERAL CONSTITUTIONAL RIGHTS UNDER THE EIGHTH AND FOURTEENTH AMENDMENTS

Argument X
THE TRIAL COURT ERRED BY PERMITTING IRRELEVANT AND SPECULATIVE EVIDENCE REGARDING THE FACTOR (B) THUS RENDERING APPELLANT'S DEATH SENTENCE UNRELIABLE IN VIOLATION OF
THE EIGHTH AMENDMENT

Sincerely,

/s
KATHY MORENO

CERTIFICATE OF SERVICE

I, Kathy Moreno, certify that I am over 18 years of age and not a party to this action. I have my business address at P.O. Box 9006, Berkeley, CA 94709-0006. I have made service of LETTER RE ORAL ARGUMENT by depositing, postage paid, in the United States mail on April 25, 2019, a true and full copy thereof, to the following:

Jeffrey Young
San Quentin, CA 94974

I have made service of the foregoing, by TrueFiling and/or email to:

CAP, ATTN: Neoma Kenwood
nkenwood@capsf.org

Attorney General Attn:
LAawt@doj.ca.gov
Mikemurphy@doj.ca.gov

I hereby declare under penalty of perjury that the above is true and correct.
Executed this 25th day of April, 2019, in Berkeley, CA under penalty of perjury.

/s/
KATHY MORENO

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 4/25/2019 by April Boelk, Deputy Clerk

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. YOUNG (JEFFREY SCOTT)**
Case Number: **S148462**
Lower Court Case Number:

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: **katmoreno@comcast.net**

3. I served by email a copy of the following document(s) indicated below:

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Michael Murphy Department of Justice, Office of the Attorney General-San Diego 178384	mike.murphy@doj.ca.gov	e-Service	4/25/2019 8:23:36 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.

4/25/2019
Date

/s/Kathy Moreno
Signature

Moreno, Kathy (121701)
Last Name, First Name (PNum)

Law Office of Kathy R. Moreno
Law Firm