Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
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Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 9/28/2026 by Celia Wong, Deputy Clerk

C A L I F O R N I A
DEPARTMENT OF JUSTICE

DEATH PENALTY

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September 28, 2026

Jorge E. Navarrete, Clerk
Supreme Court of California
350 McAllister Street, Room 1295
San Francisco, CA 94102-4797

RE: ***People v. Madison***
California Supreme Court Case No. S174886 (**Capital Case**)
New Authorities Notification

Dear Mr. Navarette:

Pursuant to California Rules of Court, rules 8.630, subdivision (d) and 8.520, subdivision (d)(1) (see also Cal. Rules of Court, rule 8.254, subd. (a)), respondent respectfully notifies the Court of the following new authorities pertaining to the claims raised in Appellant's Opening Brief (filed April 20, 2015) and Appellant's Reply Brief (filed December 23, 2016):

Issue I: Fifth Amendment privilege

- *People v. Capers* (2019) 7 Cal.5th 989, 1008-1012
- *People v. Bell* (2019) 7 Cal.5th 70, 102-103
- *People v. Silveria and Travis* (2020) 10 Cal.5th 195, 295-297

Issue II: Presenting a complete defense

- *People v. Jones* (2017) 3 Cal.5th 583, 596-601
- *People v. Camacho* (2022) 14 Cal.5th 77, 123-125
- *People v. Walts* (2025) 112 Cal.App.5th 127, 136-138
- *People v. Cortez* (2025) 114 Cal.App.5th 1201, 1213-1215

Issue III: Sufficiency of the evidence

- *People v. Brooks* (2017) 3 Cal.5th 1, 65-68
- *People v. Price* (2017) 8 Cal.App.5th 409, 451-453
- *People v. Powell* (2018) 5 Cal.5th 921, 944-948
- *People v. Lopez* (2018) 5 Cal.5th 339, 354-357

- *People v. Armstrong* (2019) 6 Cal.5th 735, 792
- *People v. Tran* (2022) 13 Cal.5th 1169, 1201-1204
- *People v. Alvarez* (2025) 18 Cal.5th 387, 474-478
- *People v. Barrera* (2026) 19 Cal.5th 919, 943-950

Issue IV: Jury instructions relating to torture-murder

- *People v. Alvarez* (2025) 18 Cal.5th 387, 466-470

Issue V: Jury instructions relating to motive

- *People v. Sanchez* (2019) 38 Cal.App.5th 907, 917
- *People v. Miles* (2020) 9 Cal.5th 513, 579-581

Issue VI: Prosecutorial error during guilt-phase opening or closing summations

- *People v. Winbush* (2017) 2 Cal.5th 402, 480-483
- *People v. Daveggio and Michaud* (2018) 4 Cal.5th 790, 854-859, 863-864
- *People v. Caro* (2019) 7 Cal.5th 463, 511-515
- *People v. Young* (2019) 7 Cal.5th 905, 933
- *People v. Armstrong* (2019) 6 Cal.5th 735, 795-798
- *People v. Fayed* (2020) 9 Cal.5th 147, 206-208
- *People v. Flores* (2020) 9 Cal.5th 371, 404-405
- *People v. Steskal* (2021) 11 Cal.5th 332, 351
- *People v. Holmes, McClain and Newborn* (2022) 12 Cal.5th 719, 786-787

Issue VII: Trial court responding to jury question

- *People v. Ramirez* (2021) 10 Cal.5th 983, 1036-1038

Issue VIII: Removal of juror for cause

- *People v. Rices* (2017) 4 Cal.5th 49, 79-80
- *People v. Winbush* (2017) 2 Cal.5th 402, 427-432 & fn. 11
- *People v. Hardy* (2018) 5 Cal.5th 56, 70-74
- *People v. Miles* (2020) 9 Cal.5th 513, 562-570
- *People v. Poore* (2022) 13 Cal.5th 266, 298-300
- *People v. Tran* (2022) 13 Cal.5th 1169, 1190-1191
- *People v. Oyler* (2025) 17 Cal.5th 756, 815-819
- *People v. Bertsch and Hronis* (2026) 19 Cal.5th 183, 260-261
- *People v. Stayner* (2026) 19 Cal.5th 395, 445-447

Issue IX: Constitutionality of California's death-qualification procedure

- *People v. Poore* (2022) 13 Cal.5th 266, 298-300
- *People v. Dunn* (2025) 18 Cal.5th 129, 197

Issue X: The impact of delays in capital cases

- *People v. Poore* (2022) 13 Cal.5th 266, 308-309
- *People v. Bertsch and Hronis* (2026) 19 Cal.5th 183, 331

Issue XI: Delay in appointing habeas corpus counsel

- *People v. Poore* (2022) 13 Cal.5th 266, 308

Issue XII: Constitutionality of the death penalty

- *People v. Oyler* (2025) 17 Cal.5th 756, 851-854
- *People v. Bertsch and Hronis* (2026) 19 Cal.5th 183, 329-331
- *People v. Stayner* (2026) 19 Cal.5th 395, 584

As to the claims raised in Appellant's Supplemental Opening and Reply Briefs (filed January 29, 2024, and November 13, 2024), respondent notifies the Court of the following new authorities:

Issues I & II: Application of Penal Code section 1172.75 to capital defendants

- *People v. Dixon* (2025) 112 Cal.App.5th 236, 239, rev. granted S292223, Oct. 22, 2025
- *People v. Millsap* (2025) 114 Cal.App.5th 368, 373
- *People v. Cain* (2025) 116 Cal.App.5th 917, 922, rev. granted S294810, Feb. 18, 2026

Sincerely,

/s/ *Christopher G. Sanchez*

CHRISTOPHER G. SANCHEZ
Deputy Attorney General

For ROB BONTA
Attorney General

DECLARATION OF ELECTRONIC SERVICE

Case Name: **People v. Madison** Case No.: **S174886**

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 correspondence. Correspondence that is submitted electronically is transmitted using the TrueFiling electronic filing system. Participants who are registered with TrueFiling will be served electronically. Participants who are not registered with TrueFiling will be served via email.

On September 28, 2026, I electronically served the attached: **NEW AUTHORITIES NOTIFICATION LETTER** by transmitting a true copy via this Court's TrueFiling system and email addressed as follows:

Danette Meyers
Los Angeles Deputy District Attorney
Email on File
via Email

Jeanne Keevan-Lynch
Attorney at Law
JKL@MyWord.WS
via TrueFiling

Criminal Appeals
Los Angeles Superior Court
Appellatebriefs@lacourt.ca.gov
via email

California Appellate Project (SF)
filing@capsf.org
via email

Court of Appeal, Second Appellate District, Division 3
2d1.clerk3@jud.ca.gov
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 28, 2026, at Los Angeles, California.

L.G.
Declarant

Signature

LA2009507470 / 68761087

Supreme Court of California
Jorge E. Navarrete, Clerk and Executive Officer of the Court
Electronically FILED on 9/28/2026 by Celia Wong, Deputy Clerk

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **PEOPLE v. MADISON (RICKY RENE)**
Case Number: **S174886**
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: **christopher.sanchez@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	Focus Letter
LETTER	New Authorities Notification Letter

Service Recipients:

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Jeanne Keevan-Lynch Attorney at Law 101710	JKL@MYWORD.WS	e-Serve	9/28/2026 4:14:45 PM

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.

9/28/2026
Date

/s/Lyrik Green
Signature

Sanchez, Christopher (316386)
Last Name, First Name (PNum)

CA Attorney General's Office - Los Angeles
Law Firm