


J. Reavey, Deputy Clerk

1 DAN DOW
District Attorney
2 BENJAMIN G. BLUMENTHAL
Deputy District Attorney
3 State Bar # 301293
County of San Luis Obispo
4 County Government Center, Room 450
San Luis Obispo, CA 93408
5 Telephone: (805) 781-5800

6 Attorney for the People of the State of California

7
8
9 SUPERIOR COURT OF CALIFORNIA
10 COUNTY OF SAN LUIS OBISPO

11
12 THE PEOPLE OF THE STATE OF CALIFORNIA,) CASE NO. 23F-09163-A
13 Plaintiff,)
14 vs.) **PEOPLE'S TRIAL BRIEF**
15)
16 CHARLES VINCENT HOJABOOM) DATE: August 18, 2025
17 Defendant.) TIME: 8:30 a.m.
18) DEPT.: 8

19 TO THE DEFENDANT AND HIS ATTORNEYS OF RECORD, SCOTT TAYLOR, AND
20 THIS HONORABLE COURT:

21 PLEASE TAKE NOTICE that Plaintiff, PEOPLE OF THE STATE OF CALIFORNIA
22 respectfully submit the following Trial Brief.

23 **STATEMENT OF FACTS**

24 Defendant is charged in relation to the unlawful use and possession of weapons at
25 California Polytechnic State University, San Luis Obispo ("Cal Poly") in four separate offense
26 dates from June 10, 2023, through November, 11, 2023. The Information in this matter alleges
27 these offense dates chronologically. Because the investigation into these defendants did not
28 begin until November 11, 2023, however, the following statement of facts begins on that

1 offense date, before discussing earlier offenses which law enforcement subsequently
2 discovered. Each offense date will be addressed in turn.

3 **November 11, 2023, Shooting in Poly Canyon and Subsequent Searches**

4 On Saturday, November 11, 2023, at approximately 10:14 pm, Cal Poly Police Officers
5 were on the scene of a traffic enforcement stop on the Cal Poly campus. At that time, officers
6 heard what sounded like gunshots being fired from the northeast side of campus. The officers
7 entered their patrol vehicles to investigate a possible shooting in progress.

8 Additional information, and the sound of additional gunfire, led officers to Poly Canyon
9 Road. After driving approximately 0.3 miles on Poly Canyon Road, Officer Valdez observed
10 two males, later identified as the defendants, walking on the road towards his patrol vehicle.
11 Defendant Hojaboom was carrying a rifle case. Both defendants were wearing backpacks.
12 Officer Valdez contacted both defendants and instructed them to sit on the ground. Both
13 defendants were cooperative with officers.

14 Inside the rifle case Defendant Hojaboom was carrying, officers located a Mossberg 12-
15 gauge shotgun registered to defendant Hojaboom. Officer Valdez performed a safety check
16 of the weapon by cycling the pump-action. When he did so, an expended shotgun cartridge
17 was ejected from the firing chamber. There were no live rounds in the shotgun at that time.

18 Inside Defendant Hojaboom's backpack, officers located a holstered semi-automatic
19 Norinco pistol chambered in 7.62x25mm and registered to defendant Hojaboom's father. The
20 pistol itself was not loaded. However, there was a magazine for the weapon with eight live
21 7.62x25mm rounds affixed to the holster in which the pistol was stored. Also in defendant
22 Hojaboom's backpack, and on defendant Hojaboom's person, officers located additional
23 loaded magazines, a bandolier with live shotgun rounds, and other live and expended rounds.

24 Defendant Hojaboom was detained in the back of a patrol vehicle. Officers did not
25 locate any contraband in defendant Pham's backpack or on his person. Defendant Pham
26 agreed to show officers the area where they had been shooting. Defendant Pham led officers
27 up Poly Canyon Road away from campus.

1 Approximately only seventy-five feet from where Officer Valdez initially contacted the
2 defendants, officers noticed a metal sign which had a hole consistent with that of a shotgun
3 slug. Defendant Pham led the officers into a creek area approximately twenty yards from the
4 road. Defendant Pham said defendant Hojaboom was shooting towards a dirt hill and bushes
5 in the area. Defendant Pham denied firing any shots that evening.

6 In the course of their investigation, officers learned the defendants were both Cal Poly
7 students. Officers also learned the defendants were roommates in a dormitory apartment on
8 campus in Poly Village in which they had individual bedrooms. Both defendants were
9 transported to the Cal Poly Police Station. Officers searched each of the defendants'
10 bedrooms.

11 In defendant Hojaboom's room, officers located, amongst other items of interest, a
12 disassembled Mosin-Nagant rifle, 650 rounds of ammunition of various calibers¹, a ski mask,
13 a machete, three large fixed-blade knives, and one butterfly knife. In defendant Pham's room,
14 officers located, amongst other items of interest, a large fixed-blade knife, Mace pepper gel, a
15 stungun/flashlight, a butterfly knife, and ammunition affixed to a military-style helmet. Officers
16 placed both defendants under arrest early in the morning on November 12, 2023.

17 On November 13, 2023, C.M., a resident at the Poly Canyon Village Apartments,
18 notified the Cal Poly Police Department he located what he believed was a bullet in his
19 bedroom. Officers determined C.M.'s bedroom was situated directly above defendant
20 Hojaboom's bedroom. Officer Valdez contacted C.M. and examined his bedroom. Based on
21 the totality of the evidence, Officer Valdez formed the opinion a bullet had been fired from
22 defendant Hojaboom's bedroom which pierced C.M.'s floor, travelled through a trunk
23 underneath C.M.'s bed, and struck C.M.'s bedframe.

24
25
26
27
28

¹ Cal Poly Police dispatch later conducted a records check regarding ammunition purchases defendant Hojaboom completed. Records revealed defendant Hojaboom purchased various calibers of ammunition fourteen times between June 9, 2023, and November 3, 2023. The total number of rounds purchased was 1,080. Amongst the ammunition defendant Hojaboom purchased were calibers for which the defendant did not have registered weapons.

1 On November 20, 2023, officers executed search warrants in the defendant's respective
2 bedrooms at Cal Poly. Officers located a piece of masking tape affixed to the ceiling above
3 defendant's Hojaboom's bed. Underneath the tape, officers located a hole consistent with a
4 large caliber rifle bullet.

5 On November 28, 2023, Cal Poly Police Detective Williams received a copy of data
6 extracted from defendant Hojaboom's cellphone, which had been searched pursuant to a
7 warrant. Detective Williams spent the following days conducting a thorough review of the data.

8 Detective Williams learned the defendants communicated with each other quite often,
9 sometimes exchanging hundreds of text messages within a day. Some messages between
10 the defendants appeared unsettling upon first glance. These messages discussed, for
11 example, shooting someone or something, including a police station. However, based on his
12 review of the totality of the messages, Detective Williams formed the opinion that these types
13 of comments were essentially intended as dark humor and satire. Detective Williams further
14 formed the opinion there was no indication the defendants had serious intent to follow through
15 with such violent comments.

16 In reviewing defendant Hojaboom's phone, however, Detective Williams located
17 evidence of three additional episodes in which the defendants actually fired weapons on the
18 Cal Poly campus between June, 2023, and October, 2023 – including one incident inside of
19 defendant Hojaboom's dormitory room. Evidence Detective Williams gathered with respect to
20 each of those incidents will be summarized in turn.

21 **June 10, 2023: Shooting Near Slack Street and Grand Avenue**

22 Beginning on the afternoon of June 9, 2023, defendants exchanged messages
23 containing photographs of themselves posing in what appeared to be one of the Yosemite
24 Tower dormitory rooms at Cal Poly.² In some of the photos, each defendant was pointing a
25
26

27 _____
28 ² Detective Williams later learned both defendants resided in Yosemite Hall during the Spring, 2023, quarter.
Both checked out of their dormitory rooms on June 18, 2023.

1 shotgun at the camera while wearing a ski mask. The shotgun in the photos appeared to be
2 the same Mossberg shotgun recovered from defendant Hojaboom on November 11, 2023.

3 In the early morning of June 10, 2023, the conversation turned to an incident that had
4 apparently taken place moments prior in the horse pasture at Cal Poly. It appeared defendants
5 had been shooting from a position on the hillside when a spotlight began to shine up towards
6 them. It seemed both defendants fled, leaving the shotgun and hearing protection behind. At
7 one point in the conversation, the following exchange took place:

8 **Pham:** Fuck tbh I don't find this funny no more man after that floodlight was searching
9 for us

10 **Pham:** Lost the ears, got the gun dirty, and we got fucked up

11 **Hojaboom:** Yeah we messed up big time

12 **Pham:** I got a big ass cut from a tree on my calf

13 **Hojaboom:** I'm going straight back after the shower

14 **Pham:** Ah shit good luck man

15 **Pham:** Hopefully you don't die tho from an angry yokel

16 **Hojaboom:** Yeah ima find that shotgun

17 **Pham:** Bring a bayonet or somethin idk

18 **Hojaboom:** Fuck

19 **Pham:** Also the ears

20 **Hojaboom:** Oh yeah huh

21 **Hojaboom:** If I can find it

22 The defendants also exchanged messages containing videos. The first video file
23 defendant Pham sent depicts defendant Hojaboom wearing ear protection and a bandolier
24 containing shotgun rounds. Defendant Hojaboom then fires a shotgun in the dark. Defendant
25 Pham can be heard laughing after the first shot. Defendant Hojaboom looks back at the
26 camera and says, "that was fuckin awesome". Defendant Pham says "dude that was
27 awesome". Defendant Hojaboom asks defendant Pham if he wants to try. Defendant Pham
28 says "yeah, I'll try", and the video ends.

1 The second video defendant Pham sent is even darker than the first, but again appears
2 to show defendant Hojaboom shooting a shotgun. At the beginning of the video, defendant
3 Pham says “this is round two, shoot two rounds.” There is then audio of what is clearly two
4 shotgun rounds being loaded into the magazine tube of a shotgun. The pump action shotgun
5 is cycled, and defendant Pham says, “oh yeah, hear dat?” Two rounds are then fired and
6 defendant Pham is heard laughing.

7 As the text conversation between the defendants continued on June 10, 2023, the
8 defendants acknowledged the dangerousness of their actions, before beginning to crudely joke
9 about the situation. The following conversation took place:

10 **Pham:** Tbh that was actually hella sped of us for shooting downwards

11 **Hojaboom:** Yeah idk

12 **Hojaboom:** At first we were try Harding then we just started fucking around

13 **Pham:** There’s a whole ass strip of houses if you follow the trajectory

14 Later in the message string, the following exchange occurred:

15 **Hojaboom:** Idk hopefully we didn’t shoot at a farmer

16 **Pham:** (image sent)

17 **Hojaboom:** According to Quora we didn’t commit murder

18 **Pham:** I hope to god we didn’t hit anything beyond the cacti

19 **Hojaboom:** As long as we didn’t waste someone on accident.

20 **Hojaboom:** Would be so terrible.

21 **Hojaboom:** Innocent wowie dies

22 **Pham:** Like even hitting some dudes truck or home would be terrible

23 **Hojaboom:** True as long as no one got hurt

24 **Pham:** Yikes, probably died when he was tryna find a place to cry near the trees

25 **Hojaboom:** At least he’s in a better place now

26 **Hojaboom:** (attachment with .pdf entitled: “Shotguns can kill at a long range”)

27 **Pham:** Lmfao naw imagine the last thing he hears before he dies, “imma load three
28 rounds, put on the ears!”

1
2 As the conversation continued, the defendants discussed shotgun ballistics, cleaning
3 up the shotgun shells, and the need to hide their footprints. At one point defendant Hojaboom
4 sent a photo of a shotgun wad and said “they might find like 30 of these.” Later, defendant
5 Hojaboom said “video on our phone”. Defendant Pham responded by saying: “better delete
6 before it’s too late.”

7 **June 17, 2023: Shooting Near Volleyball Courts**

8 Shortly after 3:00 am on June 17, 2023, defendants exchanged several messages about
9 hearing fireworks on campus. The following exchange took place:

10 **Hojaboom:** Ayo there’s fireworks outside my dorm

11 **Pham:** Yo fr?

12 **Pham:** Are they still active or naw

13 **Hojaboom:** Like I see the light outside my window

14 **Hojaboom:** Like 20 ft away

15 **Pham:** We should fire off some ‘fireworks’ too

16 **Hojaboom:** LOL

17 **Hojaboom:** U down?

18 **Pham:** Aight bet

19 **Pham:** Yo I hear em lol

20 **Hojaboom:** Like what location

21 **Pham:** Uh anywheres fine

22 **Pham:** Probably somewhere not near the ranch tho

23 **Hojaboom:** Lol true there’s no one here

24 **Hojaboom:** True maybe the volley ball feild

25 **Pham:** Yeah sounds good

26 Later in the day on June 17, 2023, defendants exchanged a total of seven videos of
27 each other shooting defendant Hojaboom’s shotgun. Detective Williams recognized the area
28

1 in which defendants were shooting in those videos from prior patrols as an area near the Sierra
2 Madre Tower 2 dormitory building and the volleyball courts.

3 On November 29, 2023, Detective Williams examined the area he recognized from the
4 defendants' videos. Detective Williams confirmed the permanent structures and trees in the
5 area appeared to match what was contained in the June 17, 2023, videos he reviewed.
6 Detective Williams later generated a map showing where the defendants were firing, and the
7 location of their targets. Detective Williams noted the defendants were firing less than thirty
8 feet from a trailhead to a heavily travelled path often used to access the Cal Poly "P", and
9 approximately 180 feet from the Sierra Madre Tower 2 dormitory (though firing away from the
10 dormitory).

11 **October 27, 2023: Shooting Inside Defendant Hojaboom's Dormitory Room**

12 Detective Williams located a message sent from defendant Pham to defendant
13 Hojaboom on October 27, 2023, at 11:28 pm, which contained a 20-second video file. The
14 video is mostly dark with the exception of a faint light which helps to identify the scene.
15 Additionally, there are two distinct voices heard in the video which Detective Williams
16 recognized as those of the defendants. No other voices are heard.

17 At the beginning of the video Pham states: "Damn, it's kinda dark." Hojaboom responds
18 by saying: "shit, na it's fine." Defendant Hojaboom can then be seen sliding backwards onto
19 what appears to be the corner of his desk. As defendant Hojaboom is moving, there is a brief
20 reflection of light on the upper right side of defendant Hojaboom's head. The People believe
21 this reflection of light is consistent with the type of ear protection headset defendant Hojaboom
22 possessed.

23 After sliding backwards, defendant Hojaboom places the butt of a rifle on his left thigh,
24 with the muzzle pointed upward. Defendant Pham says something inaudible, followed by
25 "Charles Manson". At this point in the video, the distinct sound of a bolt action rifle cycling can
26 be heard. Seconds later the weapon fires. Defendant Pham is heard saying "oh shit" after the
27 round is chambered and before the round is fired. Defendant Pham is heard laughing, and
28 saying "oh shit" after the weapon is fired as well.

1 From October 27, 2023 at 11:27:29 to October 28, 2023, at 12:25:31, there were eighty-
2 three deleted messages in defendant Hojaboom’s phone which had been exchanged with
3 defendant Pham. Unfortunately, the content of those messages could not be recovered.

4 Both defendants posted \$20,000 bonds and were released from custody on November
5 12, 2023. After posting their respective bonds, both defendants were given appearance dates
6 of November 27, 2023.

7 On November 27, 2023, Defendant Hojaboom appeared in Department 3 with attorney
8 Scott Taylor; Defendant Pham appeared with attorney Adrienne Haddad. The People had not
9 yet filed charges in this matter as the investigation into these offenses was ongoing. Both
10 defendants elected to keep their respective bonds in place. The defendants were directed to
11 appear in Department 3 on December 12, 2023.

12 On December 12, 2023, Defendant Hojaboom was remanded into custody. Bail was
13 set at no bail.

14 **MOTIONS IN LIMINE**

15 **1. ORDER THE CONTINUED DISCLOSURE OF ALL WRITTEN, RECORDED, OR**
16 **UNRECORDED STATEMENTS OF DEFENSE WITNESSES AND REPORTS OF**
17 **STATEMENTS OF DEFENSE WITNESSES.**

18 Defendant must disclose “any relevant written or recorded statements” made by
19 witnesses that defendant plans to call at trial, as well as any “reports of the statements of those
20 persons . . .” (Pen. Code, § 1054.3, subd. (a).) This includes “any reports or statements of
21 experts made in connection with the case, and including the results of physical or mental
22 examinations, scientific tests, experiments, or comparisons which the defendant intends to
23 offer in evidence at trial.” (*Id.*; *Thompson v. Superior Court* (1997) 53 Cal.App.4th 480, 482.)
24 This demand includes, but is not limited to, any and all witnesses whose attendance at trial the
25 defense has secured by subpoena within the meaning of *In re Littlefield* (1993) 5 Cal.4th 122.

26 Under *Roland v. Superior Court*, the defense must disclose all statements from its
27 witnesses, whether recorded or not. (*People v. Lamb* (2006) 136 Cal.App.4th 575; *Roland v.*
28 *Superior Court* (2004) 124 Cal.App.4th 154, 166-167.) “While defense counsel does not have

1 a duty to obtain written statements from witnesses [citation omitted] counsel is not entitled to
2 withhold any relevant witness statements from the prosecution by the simple expedient of not
3 writing them down.” (*Id.* at p. 165.)

4 As of July 25, 2025, defense counsel has informed the People of one possible witness
5 he would like to call at trial, the defendant’s former co-defendant, Mr. Pham. The People
6 provided defense counsel with Mr. Pham’s statements through discovery. Defense counsel
7 has not provided additional statements from Mr. Pham

8 If additional witnesses exist, the People request that they and their statements be
9 disclosed pursuant to Penal Code section 1054.3, subdivision (a). In addition, the People
10 request that any statements made by those witnesses be immediately disclosed as they are
11 made to defendant, his attorney, or his investigator pursuant to Penal Code section 1054.7.

12 **2. EXCLUDE ALL WITNESSES FROM THE COURTROOM DURING TRIAL EXCEPT**
13 **DEFENDANT AND AN INVESTIGATING OFFICER FOR THE PROSECUTION.**

14 The prosecution is permitted to designate an officer under Evidence Code section 777,
15 subdivision (c). Such officer “is expressly exempt from exclusion by the court.” (Evid. Code, §
16 777, subd. (c); *People ex rel. Curtis v. Peters* (1983) 143 Cal. App. 3d 597, 601-602.) The
17 People request that all witnesses, except defendant and Investigating Officer Williams be
18 excluded from the courtroom during all portions of the trial.

19 As an exception to this order, the People are prepared to stipulate that potential witness
20 Dale Hojaboom, defendant’s father, may be allowed to remain in the courtroom during all public
21 portions of this trial.

22 **3. EXCLUDE ANY REFERENCE TO THE POTENTIAL SENTENCE DEFENDANT MAY**
23 **RECEIVE IF CONVICTED.**

24 The People request that such an order exclude all references to the potential sentence
25 defendant may receive if convicted, including, but not limited to, references to “loss of liberty”
26 and immigration consequences. (*People v. Shannon* (1956) 147 Cal.App.2d 300, 306.)
27 However, granting this motion will not prohibit the parties from explaining to the jury that it is
28 within the court’s sole discretion to sentence defendant.

1 **4. EXCLUDE ANY REFERENCE TO COLLATERAL CONSEQUENCES EXPERIENCED**
2 **BY DEFENDANT AS A RESULT OF HIS ARREST AND SUBSEQUENT COURT**
3 **PROCEEDINGS.**

4 The People request that defendant be prohibited from mentioning any collateral
5 consequences he has experienced as a result of his arrest in this case. Such evidence is
6 irrelevant under Evidence Code section 350.

7 **5. IF DEFENDANT TESTIFIES, ALLOW THE PROSECUTOR TO COMMENT ON HIS**
8 **ABILITY TO HEAR THE TESTIMONY OF PRECEDING WITNESSES.**

9 If the defendant testifies, the People request to comment during closing argument on
10 the defendant’s ability to hear the testimony of other witnesses. The United States Supreme
11 Court has stated that “a witness’s ability to hear prior testimony and to tailor his account
12 accordingly, and the threat that ability presents to the integrity of the trial, are no different when
13 the defendant is doing the listening. (*Portuondo v. Agard* (2000) 529 U.S. 61, 73. Further, the
14 Court stated that “allowing comment upon the fact that a defendant’s presence in the courtroom
15 provides him with a unique opportunity to tailor his testimony is appropriate – and indeed, given
16 the inability to sequester the defendant, sometimes essential – to the central function of the
17 trial, which is to discover the truth.” (*Id.*)

18 **6. ADMIT DEFENDANT’S PRE-ARREST STATEMENTS.**

19 *Miranda* warnings are required only before custodial police interrogation. “[S]tatements
20 made in a noncustodial setting are admissible against the speaker” even when they are not
21 preceded by *Miranda* warnings. (*People v. Battaglia* (1984) 156 Cal.App.3d 1058, 1065.)
22 Custodial interrogation has long been defined as “questioning initiated by law enforcement
23 officers after a person has been taken into custody or otherwise deprived of his freedom of
24 action in any significant way.” (*Miranda v. Arizona* (1966) 384 U.S. 436, 444 (*Miranda*); *People*
25 *v. Salinas* (1982) 131 Cal.App.3d 925, 935.)

26 In *Oregon v. Mathiason* (1977) 429 U.S. 492 the Court held:

27 [P]olice officers are not required to administer *Miranda* warnings to everyone
28 whom they question. Nor is the requirement of warnings to be imposed simply
because the questioning takes place in the station house, or because the

1 questioned person is one whom the police suspect. Miranda warnings are
2 required only where there has been such a restriction on a person's freedom
3 as to render him "in custody." It was that sort of coercive environment to which
4 Miranda by its terms was made applicable, and to which it is limited. (*Id.* at p.
5 495.)

6 When determining whether a suspect is in custody for purposes of *Miranda*, the court
7 must take into account all of the circumstances surrounding the questioning. "[T]he ultimate
8 inquiry is simply whether there [was] a 'formal arrest or restraint on freedom of movement' of
9 the degree associated with a formal arrest." (*California v. Beheler* (1983) 463 U.S. 1121, 1125).

10 Here, the defendant was contacted on a trail at Cal Poly. Given officers heard multiple
11 gunshots in the area, and officers' (correct) belief the defendant was armed, officers initially
12 detained the defendant at gunpoint. Almost immediately upon contact, however, officers put
13 their firearms away and simply directed the defendant to sit on the ground. Neither defendant
14 nor Mr. Pham were handcuffed. For the next several minutes, defendant and Mr. Pham
15 conversed freely with officers. Defendant was ultimately placed in the rear of a patrol car,
16 albeit still without handcuffs. The People seek only to introduce statements made prior to the
17 defendant being placed in the patrol vehicle.

18 **7. ADMIT DEFENDANT'S POST-MIRANDA STATEMENTS TO OFFICER VALDEZ**

19 Hearsay statements by criminal defendants are admissible so long as they are
20 admissible under the Constitution of the United States and the State of California. (Evid. Code,
21 §§ 1204 and 1220.) Here, while at the Cal Poly Police Department, Officer Valdez advised
22 defendant of his *Miranda* rights. Defendant indicated he understood each of his rights and
23 subsequently spoke with Officer Valdez immediately after the advisement of rights.
24 Consequently, defendant's statements are voluntary and admissible.

25 **8. ADMIT A LIMITED NUMBER OF TEXT MESSAGE CONVERSATIONS BETWEEN 26 DEFENDANT AND MR. PHAM, THE DEFENDANT AND HIS FATHER, AND THE 27 DEFENDANT AND HIS BROTHER**

28 In reviewing defendant's phone, Detective Williams located countless messages
between defendant and Mr. Pham. Detective Williams also located messages between the

1 defendant and his father, and the defendant and his brother. Detective Williams flagged
2 several conversations as particularly relevant to this case.

3 Of those conversations, the People seek to introduce portions of seven of those
4 message threads which have been provided to Defense Counsel. At this time, it is the People's
5 understanding defendant will not seek to exclude any portions of the proposed message
6 threads subject to potential limiting instructions.

7 **9. ADMIT RELEVANT EVIDENCE PERTAINING TO DEFENDANT'S POST-ARREST**
8 **INTERNET SEARCHES AND PURCHASES**

9 After the defendant was remanded into custody on December 12, 2023, law
10 enforcement officers executed search warrants at the defendant's home in the East Bay Area.
11 Law enforcement officers also served search warrants on Google. Based on those warrants,
12 officers located evidence the People believe is highly probative and relevant to the underlying
13 charges in this case.

14 The People are in discussions with the defense in an effort to narrow any contested
15 issues with respect to the admissibility of these potential pieces of evidence. Should the
16 People not be able to reach stipulations with the defense regarding these potential exhibits,
17 the People intend to file supplemental briefing with the Court in advance of trial.

18 **10. EXCLUDE ANY OPINION TESTIMONY REGARDING DEFENDANT'S STATE OF**
19 **MIND**

20 The People anticipate defense may seek to elicit opinion testimony from Detective
21 Williams regarding the defendant's mental state and intent when he wrote particular text
22 messages and/or committed the alleged offenses in this case. Any such opinion testimony
23 would be speculative and should be excluded pursuant to Evidence Code section 352.

24 Dated: July 25, 2025

Respectfully submitted,
Dan Dow
District Attorney

26
27 

28 By: Benjamin Blumenthal
Deputy District Attorney

