

# The PROSECUTOR



## Director's Thoughts...

*The 2012 edition of the Utah Legislature is now in full swing. Given the pace at which our 6 week session moves, anything I say here will have changed by the time you read this, but I'll discuss a few things of interest.*

### **Factual Innocence Amendments**

Unless you've been hiding under a rock for the past year, you are aware of the District Court ruling out of Cache County last year that declared a convicted murderer to be factually innocent. That ruling is currently on appeal to the state Supreme Court but, as you can imagine, its success has caused an exponential rise in the number of filings by inmates under the factual innocence statute. Not only does a win come with a get out of jail free card, it provides a sizeable financial payment from the state. There has even been petition from the family of a deceased felon seeking to have their dearly departed loved one posthumously declared factually innocent and, by the way, give us the money our loved one would have received were he still with us.

HB 307 seeks to tighten up and clarify the petitioner's burden of proof by adding the following language to the

statute:

"The court, after considering all the evidence, may not find the petitioner to be factually innocent unless:

- a) the court determines by clear and convincing evidence that the petitioner did not commit one or more of the offenses of which the petitioner was convicted, as defined in Subsection 78B-9-401.5(2); and
- b) the determination is based upon the newly discovered material evidence described in the petition, pursuant to Subsection 78B-9-402(2)(a), and as defined in Subsection 78B-9-401.5(3)."

The bill also:

- Clarifies the requirement of an evidentiary hearing if the state does not stipulate to factual innocence;
- Clarifies that all proceedings are governed by Utah Rules of Civil Procedure, Rule 65C;
- Disallows prejudgment interest on payments made to a person after a finding of factual innocence; and
- Provides that a claim of factual innocence is extinguished upon the death of the petitioner.



*If the bill passes we'll see if it really makes any difference in the way courts handle factual innocence petitions. Having been skeptical of the idea from the time it was first proposed, don't hold your breath.*

### **Competency to Stand Trial**

HB 38 seeks to clarify procedure to be used when the defendant's competency to stand trial is brought into issue.

It would:

- Clarify that the court may not order an examination of the defendant or order a hearing on the mental condition of the defendant absent a finding that the allegations in the petition raise a bona fide doubt regarding the defendant's competency to stand trial;
- Require experts conducting the competency exam to consider any exhibition of false or exaggerated symptoms related to capacity to stand trial; (anyone ever hear of a defendant

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## United States Supreme Court

### GPS Tracking Device on Car Was a 'Search'

The Supreme Court held that the government's installation of a GPS tracking device on a vehicle and its use of the device to monitor the vehi-

cle's movement amounted to a search. *United States v. Jones*, No. 10-1259

### Blown Deadline Doesn't Ruin Habeas Review Where Lawyers Abandoned Client

A death-row prisoner who missed a state filing deadline because his lawyers deserted him may go forward on his federal habeas

corpus claim, the Supreme Court held. Although a petitioner is usually held accountable under agency theory for his lawyer's procedural miscues, he is not responsible for those mistakes if counsel has severed the relationship without giving notice. *Maples v. Thomas*, U.S., No. 10-63, 1/18/12

#### United States Supreme Court (p. 1-2)

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## **Brady Violation for Not Disclosing Eyewitness Impeachment Evidence**

The Supreme Court reversed a murder conviction where the testimony of an eyewitness was the sole evidence linking the defendant to the crime and prosecutors failed to disclose statements by the witness that directly contradicted his trial testimony. *Smith v. Cain*, No. 10-8145, 1/10/12

## **SORNA Does Not Apply Retroactively**

The Supreme Court ruled that the registration requirements of the federal Sex Offender Registration and Notification Act do not apply to offenders convicted before the Act went into effect until the attorney general exercises his statutory authority to specify that those requirements apply to pre-act offenders. *Reynolds v. United States*, No. 10-6549

## **Qualified Immunity for Officers Who Entered without Warrant**

The Supreme Court held that police officers who entered a home without a warrant in the belief that exigent circumstances existed were entitled to qualified immunity in a civil rights action. *Ryburn v. Huff*, No. 11-208

## **Procedural Issues in Habeas Cases Resolved**

The Supreme Court adopted the shorter of two competing interpretations of the Antiterrorism and Effective Death Penalty Act's limitations period for federal habeas corpus petitions. The court held that, in cases in which a state prisoner did not seek a discretionary appeal in the state's highest court, the federal limitations period begins to run on the day that the state court time limit for seeking discretionary review expired.

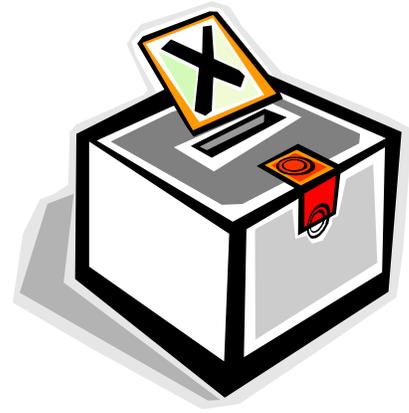
Also, the Court held that the federal habeas statute's requirement that a certificate of appealability identify the constitutional issue worthy of review is not jurisdictional. *Gonzalez v. Thaler*, No. 10-895, 1/10/12

## **Utah Supreme Court**

### **Lawfully Seized Blood Sample May be Tested for Reasons Not in Warrant**

Mr. Price argued that testing for THC was outside the scope of the warrant because the magistrate's probable cause determination was based only on the suspicion that he had been driving under the influence of alcohol. However, the Utah Supreme Court held that once lawfully seized, blood may be tested for the presence of contraband without triggering Fourth Amendment protections so long as tests are conducted in a manner that cannot

reveal details regarding legitimate privacy interests. *State v. Price*, 2012 UT 7



### **Voter Initiatives Regulating City Employee Salaries Are Allowed**

Lehi City did not allow ballot initiatives regulating salaries and residency requirements for certain city employees. On appeal, the Utah Supreme Court held that the initiatives should be allowed as granted under article VI of the Utah Constitution.

The court reasoned that the subject matter of the initiatives was legislative in nature (not administrative); and that the initiatives do not conflict with state law because the Utah Code section that requires a noticed public hearing prior to adopting any limits on city-employee salaries does not apply to voter initiatives. *Carter v. Lehi City*, 2012 UT 2

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# Director's Thoughts...continued

trying to sandbag a shrink?)

- Require that experts who find the defendant is incompetent to stand trial shall provide in their report information regarding instruments, methods, and observations used to determine if the defendant exhibits false or exaggerated symptoms; and
- Provide that if there is a conflict between the opinions of the examining experts, the court is not required to appoint an additional expert unless the court finds the appointment necessary.

## **Theft Amendments**

HB 44 proposes changes to the way a defendant is charged if he or she has previously been convicted of theft.

The bill would eliminate the provision in §76-6-412 that 3<sup>rd</sup> degree felony theft may be charged if the defendant has previously been twice or more convicted, regardless of the value of the property taken in the current offense. No more bumping frequent flyers up to felonies if the value of the property they stole was in the Class B range.

The bill would replace that long standing sentencing scheme with a one degree bump if the defendant has been twice or more previously convicted. The advantage is that a frequent flyer's 3<sup>rd</sup> degree can be bumped up to a 2<sup>nd</sup> degree, or class A to a 3<sup>rd</sup>. The disadvantage is that, regardless of the number or priors a guy may have, if he is caught stealing property with a value less than \$500, the new offense can only be bumped up to a Class A.

The bill also contains a proposal from the Retail Merchants Association that provides for a one degree bump if our frequent flyer steals from a merchant where he was previously caught stealing and the merchant, following the earlier occasion, gave the guy a letter telling him he is no longer welcome. It is unclear whether a letter from the manager of one Wal Mart will suffice for all other Wal Marts in the state or whether it must be a subsequent theft from the same store. One can imagine the legal department in

Bentonville preparing a letter to be given by all store managers, telling the thief he is never to enter another Wal Mart, anywhere.

Many prosecutors opposed this bill and the SWAP Board voted to oppose it. It was, however, strongly supported by the Sentencing Commission and by the Retail Merchants. As of this writing, it seems to be on its way.

## **Firearms Open Carry**

HB 49 provides that, absent additional threatening behavior, the otherwise lawful possession of a firearm or dangerous weapon, whether visible or concealed, may not be considered disorderly conduct. Bottom line, if this passes a guy will be able to strap on his hog leg (or carry his AK47 knock off) and walk around town or campus and, absent other threatening behavior, there won't be anything that can be done to him regardless of how concerned other persons may become.

The bill makes no changes to current concealed weapons laws.

## **Gambling**

HB 40 and HB 108 seek to better define and restrict certain promotional activities that cross the line and restrict internet gambling. HB 40 was proposed and pushed by cities who have had problems with certain unsavory business which skirt the "fringe gambling" statute that was passed a year or two ago.

In addition to the local problems these activities bring, there is the concern that if the state permits any gambling whatever, Native American tribal governments will be able to open casinos on their reservations.

## **DUI Checkpoints**

HB 140 by freshman Rep. Butterfield seeks to end a practice that threatens the fundamental freedom of every citizen of the state; that being the possibility they may be required to stop at a DUI enforcement checkpoint. (That's not too much of an exaggeration of the argument Rep. Butterfield made to the Law Enforcement Legislative Committee. He was

hardly out of the room before there was a vote to oppose.) The bill would prohibit any checkpoint or roadblock, even if court approved, for purposes of enforcing DUI, registration, insurance and/or drivers license violations. As of this writing the bill had yet to received a committee hearing.

## **Dating Violence**

HB 315 would, finally, provide for the issuance and enforcement of protective orders between parties who are, or have been, in a dating relationship when:

- the parties are emancipated or 18 years of age or older;
- the parties are, or have been, in a dating relationship with each other; and
- a party commits abuse or dating violence against the other party.

The lack of availability of protective orders to victims of dating violence has been a big hole in our interpersonal violence laws. Bills to this effect have been defeated in the past several legislative sessions. Hopefully, with a new sponsor, this year's effort will succeed.

## **Medical Examiner Authority Regarding Auto Crash Fatalities**

Utah may be the only state in the country which specifically removes jurisdiction from the Medical Examiner in auto crash fatalities. It's a long story, going back 25-30 years to a powerful legislator whose son was killed in a crash and who was very disturbed at how long the ME took to release the body and what was done to the body by the ME.

SB 13, if passed, will require the Medical Examiner to assume custody of a body when it appears the death resulted from a highway accident.

## **Assault on a Peace Officer or Member of the Military**

- SB 109 would:
- create the third degree felony offense of assaulting a peace officer or military service member in uniform when the assault results in substantial bodily injury; and

# Director's Thoughts...continued

• create the second degree felony offense of assaulting a peace officer or a military service member in uniform by use of a dangerous weapon or force likely to cause serious injury or death.

## Other Stuff

There are many other bills, both criminal and civil in nature, which are being watched by SWAP, CIV-LAC, UCDA and UAC. Among the issues addressed are: jail reimbursement and inmate medical expenses; civil commitment of people who commit

“harmful sexual conduct;” several drivers license bills; revisiting last year’s fireworks legislation; procedure and burden of proof in neglect, dependency and termination of parental rights cases; who is authorized to draw blood for DUI purposes; trespass; Spice; forced feeding of inmates; expunction of criminal records; and on and on. The session ends on March 8<sup>th</sup>.

## Spring Conference

As always, the conference will feature a full legislative wrap-up. It

will be held at the South Towne Expo Center in Sandy on April 12-13. Written summaries of all criminal and civil bills of importance to public attorneys and law enforcement will be distributed.



## On The Lighter Side

Hi Sweetheart,

I am sorry about getting into an argument about putting up the Christmas lights.

I guess that sometimes I feel like you are pushing me too hard when you want something.

I realize that I was wrong and I am apologizing for being such a hard-headed guy.

All I want is for you to be happy and be able to enjoy the holiday season.

Nothing brightens the Christmas spirit like Christmas lights!

I took the time to hang the lights for you today and now I will be off to the

golf course.

Again, I am very sorry for the way I acted yesterday.

I'll be home later.

Love you.....



# PROSECUTOR PROFILE

## Brent Langston

Deputy Emery County Attorney



Small town. Outdoors. Tough but fair.  
That's just the beginning of how one might describe Brent.

Brent grew up in Hurricane, Utah, where he learned to appreciate the great outdoors through fly fishing, hunting, and riding horses. Both his father and mother were schoolteachers. In fact, Brent too was a schoolteacher. As a teacher, he would jokingly tell the juvenile delinquents in his class that he would rather see them in court. And even though Brent didn't really know what a lawyer did (there weren't any lawyers in his small town), he made good on his "threat" and went to law school at the University of Wyoming.

After graduating, Brent got a job as a prosecutor starting at \$2,000 a month at Washington County. Brent admits that prosecuting in a rural area has its own challenges. The prosecutor usually knows people from both sides of a case, which sometimes seems to make it a no win situation. However, Brent has had many defendants thank him later for the way he handled their case. Even with this challenge, Brent moved to Emory County because Washington County, where he spent 13 years, was getting too big. You couldn't pay him enough to live in an 801 area code.

One of Brent's favorite memories is when he heard a guilty verdict on a child sex abuse case where the defense attorney claimed to have never lost a jury trial. The victim, a 5-year-old boy, was a brave and incredible witness.

On a lighter note, Brent remembers once during a drug prelim in which the defense attorney had not listened to the tape of the CI buy. He demanded to hear it all in the prelim. For once, the clarity was exceptional and you could hear everything as the buy went down in the men's room. The magistrate had to take a recess to compose herself.

One change Brent would like to see in regards to how prosecutors are trained is having more opportunities to watch others at trial. Brent suggests allowing prosecutors to get CLE for observing other prosecutors, defense attorneys, and judges. This is because while theory is fine, actual cases in action would be much more helpful, especially in rural areas where attorneys and judges are the same and can tend to get in a rut.

Brent believes that being a good prosecutor means not abusing the power you've been given and always being fair, regardless of your opponent's actions. It's about being tough, but fair.

FIRST JOB: Paperboy (made less than a dollar per day)

CHILDREN - 4 kids, ages 19-25

LAST BOOK READ - *First Man in Rome*

FAVORITE MOVIE -  
Magnificent Seven

FAVORITE TREAT - Peanut Butter Cups

FAVORITE SPORTS TEAM -  
Utah Jazz

FOREIGN LANGUAGE -  
Japanese

PETS - 4 dogs, 1 cat, 13 horses





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## Privilege Tax Statute Further Defined

The Privilege Tax Statute provides that an entity may be taxed on the privilege of beneficially using property, when the owner of that property is exempt from taxation. But the privilege tax may not be imposed unless the entity using the exempt property has “exclusive possession” of that property.

The Utah Supreme Court interpreted the phrase “exclusive possession” to be exclusive as to all parties, including the property owner. Thus, exclusive possession exists when an entity has the present right to occupy and control property akin to that of an owner or lessee. *Alliant v. Salt Lake Cnty*, 2012 UT 4

## Utah Court of Appeals

### No Right To Counsel in Post-Conviction Proceedings

One of Schwenke’s arguments on appeal was that he was not afforded the right to effective assistance of counsel in the post-conviction proceeding. However, the appellate court held that there is no right to counsel in a post-conviction proceeding.

Schwenke also argued that he was provided ineffective assistance of counsel during trial. However, Schwenke represented himself and he cannot base his post-conviction claims on his own ineffectiveness

of counsel. *Schwenke v. State*, 2012 UT App 18

### Expert’s Testimony Was Reliable

Plaintiffs filed a petition for interlocutory appeal seeking review of the trial court’s decision to preclude one of their experts, Dr. Keeter, from testifying as to causation. The appellate court overruled, holding that many of the trial court’s criticisms reflect its concerns best reserved for the weight of the evidence rather than its threshold reliability for purposes of admissibility, thus going beyond the scope of the court’s gate-keeping responsibility under rule 702. *Gun hill v. Los Angeles*, 2012 UT App 20

### No Intermediate Sanction Between Probation and Imprisonment

The aggravated sexual abuse of a child statute punishes a convicted defendant with mandatory imprisonment in accordance with section 76-3-406, which expressly prohibits any deviation from the mandatory imprisonment requirement unless provided for by the probation provision.

While the defendant on appeal argued that the probation provision allowed for an intermediate sanction between probation and imprisonment, the appellate court held that the probation provision simply does not identify any alternative to mandatory imprisonment other than “probation to a residential sexual

abuse treatment center.” *State v. Welborn*, 2012 UT App 5



### Discharged City Employee To Receive Unemployment Benefits

A city employee is not eligible to receive unemployment benefits if discharged from his or her employment for “just cause.”

The appellate court held that the County failed to carry its burden to provide either a clear explanation of the expected behavior or a violation of written policy, thus affirming the Board’s determination that Carbon County failed to establish the knowledge prong of ‘just cause.’ *Carbon County v. Marinoni*, 2012 UT App 4.

### ‘Governmental Function’ Definition Changed under ‘Public Duty Doctrine’

The Jenkins appealed from the trial court’s decision that the “public duty doctrine” barred their claim after the Jordan Valley Water Conservancy District’s waterline flooded their home.

However, the appellate court reversed, holding that the current definition of “governmental function” resulted in a complete abrogation of the Jenkins’ preexisting remedy and violated the Utah Constitution’s open

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## Important Ruling Regarding Filing and Service Deadlines in Asset Forfeiture Cases

On January 30, 2012, Judge Medley of the Third Judicial District Court dismissed a forfeiture case for lack of proper service. The case had been filed within 60 days of seizure of the property, but the service was not accomplished until more than 60 days had elapsed. The court ruled that the statute requires filing AND service within 60 days. (Judge Medley even cited to an opinion from a year ago in which he made a similar ruling.) The defense attorney will be filing a motion for attorney fees and interest, which will be a substantial hit.

Unless the state appeals and gets a different result – doubtful, and at least a year plus away – this ruling means that public attorney offices in the Third Judicial District will need to receive forfeiture cases to their office well before the 60 day filing deadline to allow time for screening, filing and accomplishment of service within 60 days of the seizure of the property. In all cases a “last known address” will be vital for either personal service or for service through certified mailing.

Even though this ruling came from the Third Judicial District Court, you can expect to see it cited in other districts of the state in cases where service was not made within the 60 day window. All public attorneys who do forfeiture cases would be well advised to follow the service of process procedures described above.

## The Utah Prosecution Council

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courts clause. *Jenkins v. District*, 2012 UT App 1

## More Leniency in Admitting Expert's Testimony During Prelim

The appellate court held that there was no error in admitting Dr. Leis's testimony in a preliminary hearing, notwithstanding Dr. Leis's acknowledgment that he could not express an opinion as to the manner and cause of death to a medical certainty.

The court also held that the State presented sufficient evidence that, when viewed in the light most favorable to the prosecution, demonstrates that Merrill's action of co-sleeping with his infant son created a substantial and unjustifiable risk of serious physical injury or death. *State v. Merrill*, 2012 UT App 3



## Erroneous Stop Ok if Facts Show Different Violation

The appellate court held that even though an officer stopped the defendant after erroneously believ-

ing that the defendant had violated a particular traffic law, the stop was still legal because the officer witnessed conduct that objectively established reasonable, articulable suspicion that a different traffic law was violated. *State v. Juma*, 2012 UT App 27

## Tenth Circuit Court of Appeals



## Law Enforcement Exception" to Freedom of Info Act Applies to Prison Records

Records of the Federal Bureau of Prisons qualify for the law enforcement exemption from the Freedom of Information Act's disclosure requirements, the Tenth Circuit held. *Jordan v. U.S. Department of Justice*, 10th Cir., No. 10-1469, 12/23/11

## Mental Retardation Can Be Proven at Time of Crime or Trial

Jury instructions that focus the question of capital offenders' mental retardation on the time of their

offenses is not an un-reasonable application of the Supreme Court's Eighth Amendment jurisprudence, the Tenth Circuit held. In other words, courts and legislatures are free, for now, to decide whether the mental retardation inquiry should focus on the time of the crime, the time of trial, or both. *Ochoa v. Workman*, 10th Cir., No. 10-6088, 1/18/12

## Court Reluctantly Strikes Down Sex Offender Ban

The Tenth Circuit struck down an Albuquerque law banning registered sex offenders from entering city libraries. The court found the ban's goal of creating a safe environment for library patrons was significant, but it struck down the law because the city failed to present evidence that the ban was narrowly tailored. *Doe v. Albuquerque*, 10th Cir., No. 10-2102, 1/20/12

## Prosecutor's Remarks on Risk to Community Were Proper

Defense counsel in a drug-trafficking case attacked the credibility of the government's witnesses by rattling off their criminal records during closing argument. The prosecutor responded that while he wished it were priests and nuns who accompanied drug dealers when they arrived "to pollute this community" with drugs, convicted criminals like the government witnesses are the best source of testimony about drug conspiracies because they are most familiar with the drug-trafficking culture.

The Tenth Circuit held that the

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prosecutor's comments were proper because they were made in response to the defense's closing argument and weren't intended to incite the jurors' passions by suggesting they act as the "community conscience." *United States v. Fleming*, 10th Cir., No. 11-8012, 12/14/11



## Other Circuits/ State Courts

### Statute That Outlaws Mailing of Threats Requires Addressee to Be Actual Person

The federal statute that outlaws the mailing of threatening communications applies only if the threats are made to a natural person (i.e. not a corporation), but a court can look inside the envelope in making that determination, the Ninth Circuit held. *United States v. Have-lock*, 9th Cir. (en banc), No. 08-10472

### Cell Phone Search Was Inevitable As Part of Warrantless Post-Arrest Inventory

Narcotics agents properly conducted a warrantless search of the call logs in a cell phone as part of an inventory of the impounded vehicle in which the phone was found, the Fifth Circuit held. *United States v. Ochoa*, 5th Cir., No. 10-51238, 1/13/12

### Anonymous Witnesses Did Not Violate 6<sup>th</sup> Amendment

Evidence that prosecution witnesses faced retaliation from a gang for their testimony justified withholding their names from defense counsel even in light of the defendant's right to confrontation the Fourth Circuit held. *United States v. Ramos-Cruz*, 4th Cir., No. 08-4647, 1/18/12

### Girlfriend's Consent to Search Overrode Suspect's Refusal Once Police Removed Him

A suspect's objection to law enforcement officers' entry of his home did not prevent them from relying on a cohabitant's consent once they arrested the suspect and removed him from the scene, the Colorado Supreme Court held. *People v. Strimple*, Colo., No. 11SA217, 1/17/12

### What Officers Said to Each Other Wasn't Testimonial

The Ninth Circuit held that DEA agents' testimony about other, nontestifying agents' radioed descriptions of a controlled buy of drugs did not violate a defendant's Sixth Amendment right of confrontation under *Crawford*. *United States v. Solorio*, 9th Cir., No. 10-10304, 1/19/12

## UTAH PROSECUTION COUNCIL AND OTHER LOCAL CLE TRAININGS

April 12-13	<b>SPRING CONFERENCE</b> <i>Case law update, legislative recap, ethics / civility, and more</i>	South Towne Center Sandy, UT
May 15-17	<b>ANNUAL CJC / DV CONFERENCE</b> <i>The best trainers teach about dealing with child abuse and domestic violence</i>	Zermatt Resort Midway, UT
June 21-22	<b>UTAH PROSECUTORIAL ASSISTANTS CONFERENCE</b> <i>Training for non-attorney staff in public attorney offices</i>	Courtyard by Marriott St George, UT
August 2-3	<b>UTAH MUNICIPAL PROSECUTORS ASSOCIATION CONFERENCE</b> <i>Annual training event for municipal and other misdemeanor prosecutors</i>	Zion Park Inn Springdale, UT
August 20-24	<b>BASIC PROSECUTOR COURSE</b> <i>Must attend course for attorneys new to prosecution</i>	University Inn Logan, UT
September 12-14	<b>FALL PROSECUTORS TRAINING CONFERENCE</b> <i>The annual training event for all Utah prosecutors</i>	Ruby's Inn Bryce Canyon, UT
October 17-19	<b>GOVERNMENT CIVIL PRACTICE CONFERENCE</b> <i>Training for civil side government attorneys</i>	Moab Valley Inn Moab, UT
November 12-14	<b>JOINING FORCES MULTI-DISCIPLINARY CHILD ABUSE CONF.</b> <i>Sponsored by Prevent Child Abuse Utah</i>	Davis Conf. Center Layton, UT
Late November	<b>ADVANCED TRIAL SKILLS COURSE</b>	Location pending

NATIONAL DISTRICT ATTORNEYS ASSOCIATION COURSES  
AND OTHER NATIONAL CLE CONFERENCES

March 5-9	UNSAFE HAVENS II <a href="#">Summary</a> <i>Prosecuting on-line crimes against children</i>	<a href="#">Registration</a>	Dulles, VA
March 11-15	FORENSIC EVIDENCE <a href="#">Summary</a> <a href="#">Agenda</a>	<a href="#">Registration</a>	San Francisco, CA
April 23-27	PROSECUTING SEXUAL ASSAULTS <a href="#">Summary</a> <a href="#">Agenda</a>	<a href="#">Registration</a>	Savannah, GA
April 30 - May 2	National Cyber Crime Conference <a href="#">Summary</a>	<a href="#">Registration</a>	Boston, MA
May 22-23	DIGITAL EVIDENCE <a href="#">Summary</a> <a href="#">Agenda</a> <i>Investigation and Prosecution of Technology-Facilitated Child Sexual Exploitation</i> <i>SHIFT training on May 24<sup>th</sup> at the same location</i>		Billings, MT
July 11-13	DIGITAL EVIDENCE <a href="#">Agenda</a>		St Paul, MN