

2015

## State of Utah, Plaintiff/Appellee v. Mario Louis Guillen, Defendant/ Appellant

Utah Court of Appeals

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Case No. 20140462-CA

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IN THE  
UTAH COURT OF APPEALS

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STATE OF UTAH,  
*Plaintiff/Appellee,*

*v.*

MARIO LOUIS GUILLEN,  
*Defendant/Appellant.*

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Brief of Appellee

---

Appeal from sentences for attempted theft and giving false personal information to a peace officer, both class A misdemeanors, in the Second Judicial District, Weber County, the Honorable W. Brent West presiding

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Oral Argument Not Requested

FILED  
UTAH APPELLATE COURTS

NOV 25 2015



Case No. 20140462-CA

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Oral Argument Not Requested

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IN THE  
UTAH COURT OF APPEALS

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STATE OF UTAH,  
*Plaintiff/Appellee,*

*v.*

MARIO LOUIS GUILLEN,  
*Defendant/Appellant.*

---

Brief of Appellee

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**STATEMENT OF JURISDICTION**

Guillen appeals from sentences for attempted theft and giving false personal information to a peace officer, both class A misdemeanors. This Court has jurisdiction under Utah Code Ann. § 78A-4-103(2)(e) (West Supp. 2015).

**STATEMENT OF THE ISSUE**

Guillen pleaded guilty to attempted theft and giving false personal information to a peace officer. At sentencing, Guillen did not look at the victim during her victim-impact statement. The prosecutor commented on Guillen's demeanor and the court stated that it had noticed as well. Guillen then spoke up and explained that his counsel had instructed him not to look at the victim. The court accepted the explanation, continued with the

hearing, and heard Guillen's brief, remorseful statement. The pre-sentence recommendation report (PSI) recommended a jail sentence based on Guillen's extensive criminal history. The trial court followed that recommendation and imposed concurrent jail terms.

Is Guillen's assertion that the trial court relied on his inattentiveness to the victim in imposing a jail sentence supported in the record; and if so, does the trial court's alleged reliance support Guillen's claims of plain error and ineffective assistance of counsel?

*Standard of Review.* Plain error requires obvious, prejudicial error. *State v. Holgate*, 2000 UT 74, ¶13, 10 P.3d 346. Ineffective assistance of counsel claims raised for the first time on appeal present questions of law. *State v. Ott*, 2010 UT 1, ¶16, 247 P.3d 344.



## STATEMENT OF THE CASE

### A. Summary of facts.<sup>1</sup>

Guillen went to Ashley Boyd's apartment uninvited one evening under the guise of hanging out. R625:2. Because Ms. Boyd knew Guillen, she invited him in and they watched a movie. R625:2. Around 11:00 p.m., Guillen fell asleep. R625:2, 46. Ms. Boyd finished watching the movie and went to bed around 1:00 a.m., leaving Guillen asleep on her couch. R625:46; R625:2. When Ms. Boyd awoke, she found Guillen gone, along with her laptop, cellphone, CDs, DVDs, camera, iPod, and zebra print pillow case. R625:2.

Ms. Boyd called police and reported the theft. R625:2 Ms. Boyd told officers that she and Guillen were the only people in her apartment that evening and picked Guillen's photo out of a photo line-up. R625:2, 46. Officers could not locate Guillen for questioning and eventually a warrant was issued for his arrest. R625:2-3.

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<sup>1</sup> Because Guillen pleaded guilty, the facts are taken from the pleadings, including the presentence investigation report. The pleadings are in two different cases, 151900895 and 14901625. Case number 151900895 is cited to as 895:record number and case number 14901625 is cited to as 625:record number. The transcripts for both the pre-trial conference hearing and sentencing hearing are provided but not marked with a separate bate number. However, duplicate transcripts for each hearing are located in the pleadings for case number 14901625 and are referred to as 625:record number.

Nine months later, Ogden City Police received reliable information that Guillen was in the Ogden area and had an active warrant from Colorado. R895:4. Officer Bennett, recognizing Guillen from his picture, saw Guillen driving and stopped him. R895:4. During the stop, Guillen gave Officer Bennett a gym membership card that stated his name was "Anthony Zalamea." R895:34. Guillen was subsequently arrested. R895:4. During a search incident to arrest, officers found Guillen's New Mexico State Identification and marijuana paraphernalia—a small electric scale and wooden pipe. R895:4.

**B. Summary of proceedings.**

*The Plea Agreement*

Guillen was initially charged with theft, a third degree felony, giving false information to peace officer, a class A misdemeanor, and use or possession of drug paraphernalia, a class B misdemeanor. R895:3; R625:1. The State, as part of a plea agreement, agreed to recommend concurrent sentencing, reduce the third degree felony theft charge to class A misdemeanor attempted theft, and dismiss the drug paraphernalia charge. R625:35, 79.

Per that plea agreement, Guillen pleaded guilty to attempted theft and giving false information to a peace officer. R625:77.

### *The Sentencing Hearing*

The court began the hearing by noting that the case was set for two purposes: sentencing and extradition. R625:88. The court asked Guillen and his counsel about Colorado's extradition request. R625:88. Trial counsel stated that Guillen wanted to resolve his Utah cases and asked for good time credit. R625:88.

The State then addressed the court regarding sentencing. R625:88. The State recommended that the court follow the PSI sentencing recommendation. R625:88. The PSI recommended two concurrent sentences of 365 days in jail with credit for 75 days served and restitution to the victim. R625:45. The PSI recommendation was based on Guillen's lengthy criminal history. R625:47-48. Guillen had convictions for burglary of a building, burglary, unlawful acquisition of a credit card, possession of a controlled substance, possession of drug paraphernalia, and multiple thefts. R625:47-48. He also had served time in prison and had a negative parole history, with revocations for using drugs and twice absconding from supervision. R625:49. And finally, at the time of sentencing, Guillen was awaiting extradition to Colorado to face an aggravated motor vehicle theft charge. R625:45, 88.

Ms. Boyd then addressed the court. R625:89. Ms. Boyd stated that after Guillen took her property she "couldn't sleep," and was afraid that he would "come back and hurt" her. R625:89. Ms. Boyd said that the CDs and DVDs were meaningful to her because they were gifts from her parents and she would watch and listen to them on her laptop often. R625:89. Ms. Boyd stated that she can no longer do that because of Guillen. R625:89.

After Ms. Boyd addressed the court, the State noted that Guillen did not pay attention to her while she spoke: "I find it interesting that the defendant doesn't pay attention to the victim during [her] speech." R625:90. The trial court responded that Guillen's demeanor "was not lost on me." R625:90. Guillen then spoke up, stating that his lawyer told him "not to look at [Ms. Boyd.]" R625:90. The court responded, "Oh. Okay. All right. Anything else anybody wants to say?" Guillen then addressed the court and said that he was "sorry for what I did and hopefully, she can forgive me and I've got to do my time." R625:90.

The trial court sentenced Guillen to concurrent one year terms in jail on each of the two counts and ordered restitution in the amount of \$5,691.98 to Ms. Boyd.<sup>2</sup> R625:91. The court explained that the reason for the

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<sup>2</sup> Guillen is not challenging the restitution order on appeal.

sentence was that the PSI “recommended maximum sentences,” “and I think the recommendation is correct.” R695:90.

Guillen timely appeals. R695:58.

### **SUMMARY OF ARGUMENT**

Guillen argues that the trial court plainly erred for allegedly relying on his failure to look at Ms. Boyd while she read her victim–impact statement as the basis for imposing a jail sentence – and that his counsel was ineffective for not objecting. But Guillen cannot prove either plain error or ineffective assistance on this record because he cannot prove prejudice, a necessary element of both claims.

Guillen cannot prove prejudice for essentially two reasons. First, the record does not support that the trial court relied on his inattentiveness – it refutes it where the trial court accepted Guillen’s explanation for his inattentiveness. Second, even if the record did support that the trial court considered Guillen’s inattentiveness, Guillen has not shown – and cannot show – any reasonable likelihood of a different result absent that alleged reliance. This is because the PSI recommended the jail sentence based on Guillen’s extensive criminal history. The PSI recommendation and Guillen’s criminal history are themselves sufficient to support the imposition of a jail



sentence. Thus, Guillen's plain error and ineffective assistance of counsel arguments both fail for lack of prejudice.

In any event, Guillen's plain error argument also fails because he has not proven error, let alone, obvious error. Again, the record does not support Guillen's claim that the trial court relied on his inattentiveness to the victim, but even if he did, Guillen has not shown that any alleged reliance was erroneous. Indeed, Guillen cites to no authority firmly establishing that a trial court's reliance on a defendant's inattentiveness to the victim during sentencing would be erroneous, let alone, obviously erroneous. To the contrary, the pertinent authorities establish that inattentiveness and a defendant's demeanor are proper factors to consider at sentencing. Guillen's plain error argument thus also fails because he has shown no error, let alone, obvious error.

For essentially the same reason, Guillen has not proven the deficient performance element of his ineffective assistance claim. Again, the record refutes Guillen's assertion that the trial court relied on his inattentiveness in imposing a jail sentence. Accordingly, there was no basis or need for an objection by counsel. In any event, as stated, inattention to the victim is a proper consideration. Thus, any objection would have been futile.

## ARGUMENT

### GUILLEN HAS PROVEN NEITHER PLAIN ERROR NOR INEFFECTIVE ASSISTANCE OF COUNSEL

Guillen argues that he is entitled to resentencing because the trial court allegedly relied on his failure to look at Ms. Boyd during her victim-impact statement as the basis for imposing a jail sentence. Br. Aplt. 3. Because Guillen did not object to the trial court's alleged reliance on his failure to look at Ms. Boyd, Guillen raises his challenge to the jail sentence under the doctrines of plain error and ineffective assistance of counsel. Br. Aplt. 6-9. Both claims fail at the outset for lack of prejudice where there is no record evidence that the trial court considered Defendant's inattentiveness to Ms. Boyd. For essentially the same reason, Defendant fails to show any error, let alone obvious error. Nor has he shown deficient performance. His request for resentencing should therefore be denied.

\*\*\*\*\*

To prevail under plain error review, "a defendant must establish that (1) an error exists; (2) the error should have been obvious to the trial court; and (3) the error is harmful, i.e., absent the error, there is a reasonable likelihood of a more favorable outcome." *State v. Holgate*, 2000 UT 74, ¶13, 10 P.3d 346. To prevail on a Sixth Amendment ineffectiveness claim, a defendant "has the difficult burden of showing *actual unreasonable*

*representation and actual prejudice.” State v. Tyler*, 850 P.2d 1250, 1259 (Utah 1993) (emphasis in original). The prejudice element is the same as that required for plain error. *See State v. Ellifritz*, 835 P.2d 170, 174 (Utah Ct. App. 1992) (recognizing plain error and ineffective assistance share a “common standard” of prejudice, i.e., absent the alleged error or ineffective assistance “the result would likely have been different for defendant”); *see also State v. MacNeil*, 2013 UT App 134, ¶42, 302 P.3d 844 (same), *cert. granted*, 317 P.3d 432 (Utah 2013).

**A. This Court should affirm because Guillen has not proven prejudice.**

Guillen has not proven – and cannot prove – prejudice on this record. No record evidence supports that the trial court relied on Guillen’s failure to look at Ms. Boyd in imposing concurrent jail terms. As shown, Guillen objected to the prosecutor and the trial court’s comments and explained that he had not looked at Ms. Boyd because his counsel instructed him not to. R625:90. The trial court responded, “Oh Okay. All right. Anything else anybody wants to say,” and continued the hearing. R625:90. Guillen then gave a brief statement where he expressed remorse. R625:90.

The trial court’s comments support that he did not consider Guillen’s failure to look at Ms. Boyd in imposing concurrent jail sentences. Rather, the record shows that the trial court accepted Guillen’s explanation for his

inattentiveness, i.e., that his counsel had instructed him not to look at the victim. The record further shows that the trial court relied on the PSI recommendation in imposing jail terms. R625:90. Because the record does not support Guillen's argument that the trial court relied his inattentiveness to Ms. Boyd, it necessarily follows that Guillen fails to show any prejudice.

But even if the trial court had relied on Guillen's failure to look at Ms. Boyd in imposing a jail sentence—and even assuming such reliance was erroneous—Guillen could still not show prejudice on this record. Again, the PSI recommended a jail sentence and Guillen's extensive criminal history supported that recommendation. R625:45, 47-48, 88.

Given the above, Guillen has not proven prejudice and his claims of plain error and ineffective assistance may both be rejected on that ground. *See Harrington v. Richter*, 562 U.S. 86, 131 S.Ct. 770 at 772 (likelihood of "different result must be substantial, not just conceivable"); *McNeil*, 2013 UT App 134, ¶¶26, 30, 302 P.3d 844 (prejudice must be a "demonstrable reality").

**B. Defendant has not proven error, let alone, obvious error.**

For essentially the same reason Guillen has not proven prejudice, he has not proven error, let alone, obvious error.

Guillen asserts that the trial court erroneously relied on his failure to look at Ms. Boyd in imposing concurrent jail terms. But as shown, the record does not support that the trial court considered it at all. To the contrary, the record supports that the trial court accepted Guillen's explanation for not looking at Ms. Boyd. Moreover, the trial court explicitly stated that he was sentencing Guillen to jail because he thought that the PSI jail recommendation was correct. R625:90.

In any event, even if the trial court had considered Guillen's inattention to Ms. Boyd, Guillen has not shown that it would have been erroneous, let alone plainly erroneous to do so. This is because Guillen points to no case firmly establishing that a defendant's inattention to a victim during sentencing is irrelevant. *See State v. Dean*, 2004 UT 63, ¶16, 95 P.3d 276 (error only obvious if "the law governing the error was clear at the time the alleged error was made."); *State v. Ross*, 951 P.2d 236, 239 (Utah App. 1997) (error not obvious when "there is no settled appellate law to guide the trial court"). And for good reason—it is very relevant.

Inattentiveness and courtroom demeanor are relevant sentencing factors because they indicate a defendant's remorsefulness, overall attitude and acceptance of responsibility. *See State v. Killpack*, 2008 UT 49, ¶58, 191 P.3d 17 (trial court has "wide latitude and discretion" in determining



sentencing; can consider defendant's remorsefulness, attitude). And, a trial court can consider these factors when sentencing. *See e.g., United States v. Harris*, 418 Fed. Appx. 767 (10th Cir. 2011) (unreported) (court can consider defendant's courtroom demeanor, lack of remorse, and failure to acknowledge responsibility for sentencing.); *United States v. Gaines*, 87 Fed.Appx. 145, 146 (10th Cir. 2004) (remorse and acceptance of responsibility are possible mitigating circumstances); *State v. Maestas*, 2012 UT 46, ¶329, 299 P.3d 892 (court can consider defendant's lack of remorse as aggravating factor); *State v. Lafferty*, 2001 UT 19, ¶101, 20 P.3d 342 (in capital sentencing proceedings, defendant's lack of remorse, character, and any other facts relevant to aggravation or mitigation of penalty can be considered); *State v. Ashcraft*, 2014 UT App 253, ¶8, 338 P.3d 247 (court properly considered victim's injuries and defendant's lack of remorse and failure to take responsibility at sentencing); *State v. Ward*, 2012 UT App 346, ¶ 3, 293 P.3d 399 (per curiam) (trial court can consider defendant's failure to "take[ ] responsibility for the harm he admittedly caused" as an aggravating factor).

Thus, even if the trial court considered Guillen's demeanor during the sentencing hearing, the court did not err, let alone, plainly err.

**C. Defendant has not proven deficient performance.**

Finally, for essentially the same reasons Guillen has not shown any error, he has not shown deficient performance.

To prove deficient performance, Guillen must show that no reasonable attorney would have forgone objecting to the trial court's alleged reliance on Guillen's inattention to the victim. *Strickland v. Washington*, 466 U.S. 668 (1984); *State v. Clark*, 2004 UT 25, ¶6, 89 P.3d 162. Guillen must "overcome the strong presumption that his trial counsel rendered adequate assistance" by proving trial counsel's performance "fell below an objective standard of reasonableness." *Strickland*, 466 U.S. at 689; *Clark*, 2004 UT 25, ¶6 (citation and quotation omitted).

As shown, Guillen himself objected and informed the trial court of the reason for his inattention to the victim. R695:90. And the trial court appeared to accept that explanation. R695:90. The trial court did not dwell on Guillen's demeanor, but continued the hearing, allowing Guillen to give a brief statement expressing his remorse. R695:90. An additional objection by Guillen's counsel was unnecessary and would only continue to draw the court's attention to Guillen's inattentiveness, instead of his remorsefulness. *See Clark*, 2004 UT 25, ¶7 (no deficient performance where conceivable tactical strategy existed for not objecting).

In any event—as shown—the trial court could rely on Guillen’s demeanor when sentencing, thus, an objection on this basis would have been futile. *State v. Chacon*, 962 P.2d 48, 51 (Utah 1998) (failure to make futile objection is not ineffective assistance); *Killpack*, 2008 UT 49, ¶58 (trial court has broad discretion when determining sentences, can consider defendant’s attitude).

Lastly, Guillen’s reliance on *State v. Ott* is misplaced. In *Ott*, the Utah Supreme Court held that Ott’s counsel rendered ineffective assistance of counsel for failing to object to prejudicial victim-impact evidence in a capital sentencing hearing. 2010 UT 1, ¶49, 26, 247 P.3d 344. But as acknowledged by Guillen, this case does not involve either victim-impact evidence or a capital sentencing. More importantly, as shown, Guillen has not proven that the trial court in fact relied on Guillen’s inattention to Ms. Boyd or that, even if the trial court did so, that reliance was at all improper.

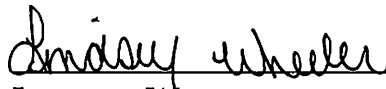
Ott is thus inapposite.

## CONCLUSION

For the foregoing reasons, the Court should affirm.

Respectfully submitted on November 25, 2015.

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Utah Attorney General

  
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### CERTIFICATE OF SERVICE

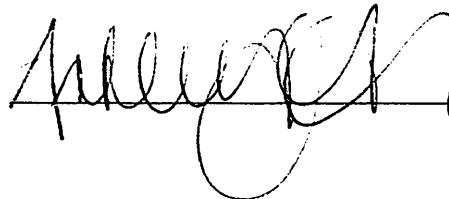
I certify that on November 25, 2015, two copies of the Brief of Appellee were ☒ mailed ☐ hand-delivered to:

Samuel P. Newton  
1267 Quarter Horse Lane  
Kalispell, Montana 59901-2514

Also, in accordance with Utah Supreme Court Standing Order No. 8, a courtesy brief on CD in searchable portable document format (pdf):

☒ was filed with the Court and served on appellant.

☐ will be filed and served within 14 days.



Addenda

Addenda



# Addendum A

IN THE SECOND JUDICIAL DISTRICT COURT, OGDEN  
WEBER COUNTY, STATE OF UTAH

-o0o-

STATE OF UTAH,	)	
	)	
Plaintiff,	)	Case No. 141901625
vs.	)	Case No. 151900895
	)	
MARIO LOUIS GUILLEN,	)	<u>SENTENCING</u>
	)	
Defendant.	)	

-o0o-

BE IT REMEMBERED that on the 3<sup>rd</sup> day of June, 2015,  
commencing at the hour of 9:23 a.m., the above-entitled matter  
came on for hearing before the HONORABLE W. BRENT WEST,  
sitting as Judge in the above-named Court for the purpose of  
this cause and that the following proceedings were had.

-o0o-

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UTAH APPELLATE COURTS

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\* \* \*

P R O C E E D I N G S

(Transcriber's Note: Speaker identification  
may not be accurate with audio recordings.)

MR. SHAW: Nos. 8, 9 and 10, Mario Guillen.

THE CLERK: State of Utah vs. Mario Louis Guillen,  
Case Nos. 141901625 and 151900895. Time set for sentencing.  
And 151900904, it's been set for disposition and extradition.

THE COURT: Any reason why sentence should not be  
imposed?

MR. MARSHALL: No, your Honor.

THE COURT: Would you and Mr. Guillen like to  
address it? My understanding is Colorado wants him.

MR. MARSHALL: That's my understanding as well, so I  
guess the first step is to get him resolved here, we certainly  
would ask for credit, which they've already talked about and I  
assume this Court generally is good about good time, so we  
would ask for that.

THE COURT: Okay. The State want to be heard?

MR. SHAW: State will submit it on the  
recommendations.

THE COURT: Anything else from Adult Probation &  
Parole?

UNIDENTIFIED SPEAKER: No, your Honor.

1                   THE COURT: Is he in any kind of posture to pay the  
2                   restitution?

3                   MR. SHAW: Your Honor, I do have a victim here that  
4                   would like to speak.

5                   THE COURT: All right.

6                   MR. SHAW: I'd forgot about that.

7                   THE COURT: Who am I going to hear from?

8                   MR. SHAW: That's a good question.

9                   THE COURT: A. Boyd?

10                  MS. BOYD: Yes.

11                  THE COURT: Okay.

12                  MS. BOYD: My name is Ashley Boyd. I'm Mario's  
13                  victim. After Mario took my stuff, I couldn't sleep, every  
14                  time I tried, I'd wake up crying and screaming with fear from  
15                  nightmare that he'd come back and hurt me. My CDs and movies  
16                  were all I had. I was content staying home and watching  
17                  movies and listening to music. Every year since I was a  
18                  child, my parents would buy me movies and CDs, I'd stay up on  
19                  my laptop. I can't do that because of Mario.

20                  I cry myself to sleep, begging for an answer, why  
21                  me? Why my stuff? I can't watch movies with my niece and  
22                  nephew, because Mario took that from us.

23                  I lived in fear up until Mario got caught.

24                  THE COURT: Thank you. Anything else you'd like to  
25                  tell me?



1 MS. BOYD: No.

2 THE COURT: Okay. Thank you.

3 Anything else?

4 MR. SHAW: Well, I find it interesting that the

5 defendant doesn't pay attention to the victim during the

6 speech.

7 THE COURT: Her colloquy, I understand. I--that was

8 not lost on me.

9 MR. GUILLEN: My lawyer told me not to look at her,

10 so...

11 THE COURT: Pardon?

12 MR. GUILLEN: My lawyer told me not to look at her.

13 THE COURT: Oh. Okay. All right.

14 Anything else anybody wants to say?

15 MR. GUILLEN: I'd like to say actually I'm sorry for

16 what I did and hopefully, she can forgive me and I've got to

17 do my time.

18 THE COURT: Okay. Well, they've recommended maximum

19 sentences, Mr. Guillen, and I think the recommendation is

20 correct.

21 It's going to be the order and sentence of the Court

22 that you're to serve a year in the Weber County jail on each

23 of the two Class A misdemeanors. I'll run them concurrent,

24 I'll give you credit for time served, which I show to be 75

25 days.

1 I'm imposing a restitution order of \$5,691.98. Ms.  
2 Boyd is the victim, we'll reduce that down to a civil  
3 judgment.

4 MR. MARSHALL: Your Honor?

5 THE COURT: Yes.

6 MR. MARSHALL: Actually, Mr. Guillen wants to--does  
7 not agree with the restitution.

8 THE COURT: So he wants a hearing on the restitution  
9 figure?

10 MR. MARSHALL: Yes. I apologize.

11 THE COURT: State want to be heard?

12 MR. SHAW: I guess he's entitled to a hearing. We  
13 can--we can set that out--

14 THE COURT: Thirty days?

15 MR. SHAW: Yeah. That's fine.

16 THE COURT: All right. Well set the hearing for  
17 July 1.

18 MR. MARSHALL: I won't be here then, your Honor.

19 THE COURT: When will you be here?

20 MR. MARSHALL: The following week I'm here.

21 THE COURT: July 8<sup>th</sup>. All right. We'll set it for  
22 July 8<sup>th</sup> at 11:00 o'clock.

23 Now, has he signed the extradition papers or is he  
24 indicating that they want--he wants a governor's warrant?

25 MR. MARSHALL: He's not signing the--

1                   THE COURT: All right. Then we'll notify Colorado  
2 to prepare the governor's warrant.

3                   All right. So he's doing a year, which is the  
4 maximum sentence. He's got credit for time served. We'll  
5 have a restitution hearing on July 8<sup>th</sup> and Colorado will be  
6 notified to do the governor's warrant to come get him 'cause  
7 he's not waiving.

8                   THE CLERK: (Inaudible)

9                   THE COURT: They show 75 days, yes. Okay.

10                  (Whereupon, this hearing was concluded.)

11                               \* \* \*

TRANSCRIBER'S CERTIFICATE

STATE OF UTAH :  
 : ss.  
COUNTY OF SALT LAKE :

I, Toni Frye, do hereby certify:

That I am a Certified Court Transcriber of Tape Recorded Court Proceedings; that I received the electronically recorded files of the within matter and have transcribed the same into typewriting, and the foregoing pages, to the best of my ability, constitute a full, true and correct transcription, except where it is indicated the Electronically Recorded Court Proceedings were inaudible.

Dated this 16th day of June, 2015.

Toni Frye  
Toni Frye, Transcriber

I, RENEE L. STACY, Registered Professional Reporter, Certified Realtime Reporter and Notary Public for the State of Utah, do hereby certify that the foregoing transcript, prepared by Toni Frye, was transcribed under my supervision and direction.

Renee L. Stacy  
Renee L. Stacy, RPR, CRR

My Commission Expires:

11-9-2015

