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STATE OF WISCONSIN  
C O U R T O F A P P E A L S

DISTRICT IV

Case No. 2021AP126 - CR

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STATE OF WISCONSIN,

Plaintiff-Respondent,

v.

NESTOR LUIS VEGA,

Defendant-Appellant.

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ON APPEAL FROM A JUDGMENT ENTERED IN  
PORTAGE COUNTY CASE 2016CF296, THE  
HONORABLE JUDGE ROBERT SHANNON PRESIDING.

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BRIEF OF DEFENDANT-APPELLANT

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### **STATEMENT OF ISSUES**

ISSUE ONE: Did the trial court's admission of evidence regarding Vega's post-Miranda silence violate Vega's constitutional right to remain silent, warranting a new trial?

The trial court answered no.

ISSUE TWO: Did Vega's trial attorney provide ineffective assistance of counsel for not properly objecting immediately when the State began to solicit questions about Vega's post-Miranda silence and for not sufficiently preserving an objection to the constitutionality concerns about the questions?

The trial court answered no.

### **STATEMENT ON ORAL ARGUMENT**

Oral argument is not requested because the facts and legal analysis can be sufficiently developed in writing.

### **STATEMENT ON PUBLICATION**

Publication is requested because the facts of this case are not so unique that they are unlikely to recur. The issue presented in this case has the potential to clarify the law regarding admissibility of a defendant's post-Miranda silence, in the context of a claim of ineffective assistance of counsel.

## **STATEMENT OF THE CASE & RELEVANT FACTS**

Nestor Luis Vega (hereinafter referred to as “Vega”) was charged with five counts of Delivery of Heroin, in an amount less than 3 grams; Felony Possession of THC; Maintaining a Drug Trafficking Place; and two counts of Felony Bail Jumping. (R. 6). Vega entered a no contest plea to the Possession of THC and the two counts of Felony Bail Jumping. (R. 42; R. 108). However, Vega exercised his right to have a trial on the remaining counts.

At trial, the State called four witnesses to testify regarding five alleged controlled buys of heroin. Detective Schultz searched the informant before and after each controlled buy (with negative results) and also assisted by providing surveillance on the informant when he traveled to and from each controlled buy. (R. 110:66-110:67; R. 110:72-110:73; R. 110:77-110:83). According to Detective Schultz, the informant was not searched under his clothing, nor was the informant asked to remove his shoes during the search. (R. 110:108).

Officer Gischia testified that the quantity of heroin involved in the controlled buys was approximately the size of a marble. (R. 109:174). Furthermore, Officer Gischia acknowledged that it is possible for an informant to have a small item concealed or hidden on their person. (R. 109:161).

At the time of Vega’s arrest, no heroin was located on his person, in his vehicle, or in his home. (R. 109:171-109:172). In addition, none of the pre-recorded buy money used in the alleged controlled buys was recovered from Vega. (R. 110:134).

The informant who conducted the controlled buys, Michael Gershon, also testified. The informant testified that he started working as an informant because he was investigated for a theft and needed to recover the stolen goods because he had given them to Vega. (R109:182-109:184). According to Gershon, he needed to use funds provided by law enforcement to recover the stolen goods, which he recovered from Vega at the time of the first alleged controlled buy on June 13<sup>th</sup>. (R. 109:185).

The informant testified that on each of the alleged controlled buys, he was provided currency, which he exchanged with Vega for the drugs that were provided to law enforcement. (R. 109:188-109:219; R. 110:10-110:31). Audio recordings of each of the five alleged controlled buys were also admitted at trial. (R. 38). However, the alleged transactions were not visually recorded or observed directly by law enforcement or any other witness who testified at trial.

The jury heard testimony from the laboratory analyst that tested the drugs that Vega allegedly delivered to the informant. (R. 109:120-109:126). The analyst testified that she tested five substances, all of which were positive for heroin, weighing 0.101, 0.140, 0.83, 0.32, and 0.419 grams each. *Id.*

Officer Gischia testified regarding his assistance in arresting Vega. (R. 109:153). Specifically, he stopped his vehicle in front of Vega's and pinned the vehicle so that Vega could be taken into custody. (R. 109:153-109:155). Detective Schultz also assisted in stopping Vega's vehicle and noted that the stop was conducted at gunpoint. (R. 110:119).

In his defense, Vega called one witness and testified himself. Vega called his girlfriend, Nalia Santiago as his first witness. (R. 110:176). His girlfriend testified that Vega

never kept heroin in their home. (R. 110:176-R. 110:177). According to Vega's girlfriend, the informant was a friend of Vega's who visited often but stayed for lengthy periods of time to hang out and play video games. (R. 110:182; R. 111:7-111:8).

Last, Vega testified. Vega denied committing the controlled buys or keeping heroin at his residence. (R. 111:56). Vega testified that the informant was a friend that he admittedly smoked marijuana with and played video games. (R. 111:23). Vega testified that on the dates of each of the alleged controlled buys, the informant had visited for short periods of time to either pay Vega money he owed for the stolen property or past loans, and additionally to look for a missing Quest card that the informant thought he dropped at Vega's residence. (R. 111:29-111:38; R. 111:40-111:48).

On cross-examination, the State asked several questions of Vega regarding his silence after his arrest. (App. 29-31). All of those questions pertained to why he didn't explain his side of his story to law enforcement:

Q. Now, I'm assuming that on June 27<sup>th</sup> or into the early morning hours of June 28<sup>th</sup> when you were taken into custody Detective Schultz must have approached you to talk about what was going on, right?

A. On the 27<sup>th</sup>?

Q. After the traffic stop when you were arrested.

A. No. He came by - - He - - He read me my rights and told me that I was being arrested for five controlled buys.

Q. All right. So I'm assuming at some point - - Okay. So did he tell you the reason for you being placed under arrest was for selling heroin?

A. Correct.

Q. All right. And I'm assuming, based on your testimony here today, that that was a shock to you.

A. Yes, it was.

Q. And I'm assuming because of what your testimony is here today that you didn't sell heroin; you would have wanted to tell the detective that you didn't sell heroin?

A. Correct. But I also have the right to remain silent.

Q. But you didn't - - So you didn't make any effort to talk to the detective about the fact that you were innocent of these charges?

A. No.

Q. And you didn't take any opportunity after that point to contact Detective Schultz to explain Mr. Gershon's presence at your residence on those five occasions?

(App. 29-30). At that point in questioning, Vega's attorney objected, and a sidebar was held. (App. 30; App. 32-33).

A record was made of the sidebar. (App. 32-33). At that time, trial counsel noted that his objection to the State's "continued questions about exercising the right to remain silent." (App. 32). The State responded that the questioning was not a comment on Vega's right to remain silent; rather,



the State argued that a defendant has a right to choose to make a statement at any point in time, so the question was directed at why Vega didn't later choose to comment. (App. 33). The trial court ruled that a limited inquiry was permissible. (App. 33).

As such, continued questioning occurred:

Q. So, again, Mr. Vega, you have recounted for the jury here today your explanation of the five times when Mr. Gershon was at your residence and what those were for. I'm assuming you knew this same information back on June 28<sup>th</sup> when all of this happened and you were arrested.

A. On the 27<sup>th</sup>, you mean?

Q. Right.

A. Well, I don't know what he all meant when he said I had five control buys. I didn't know what that was for.

Q. That's not my question. My question is what you told us today I'm assuming you knew back on June 27<sup>th</sup>, correct?

A. Correct.

Q. All right. So if you knew it on June 27<sup>th</sup> - - I understand that day you chose not to talk with the officers, but even after that point you never made any effort to contact the police to talk about what happened from your point of view.

A. If I wouldn't have known what it's about, what am I going to talk about?

Q. You never made any attempt after June 28<sup>th</sup> to talk with law enforcement to share this information with them that you shared with the jury here today?

A. No.

Q. And I'm assuming you had the opportunity to do so. You just chose not to.

A. That's one of my rights.

(App. 30-31).

The jury returned verdicts of guilty on all counts. (R. 40). Vega was convicted and sentenced on all charges. (R. 55).

Vega filed a notice of intent to pursue post-conviction relief and subsequently filed a post-conviction motion seeking a new trial. (R. 90). Specifically, Vega argued that the trial court's ruling, permitting the State to question him about his post-arrest silence violated his right to remain silent. In addition, Vega alleged that his attorney was ineffective for failing to immediately object to that line of questioning and for failing to raise a continuing objection to the same.

An evidentiary hearing was held January 13, 2021. (R. 118). At that hearing, trial counsel testified. (App. 15-28).

Vega's attorney testified that he did not object immediately to the questions asked of Vega pertaining to his post-arrest silence, because he mistakenly thought that any and all questions asked about a defendant's silence were proper. (App. 17-18). According to counsel, he reviewed the cases cited in Vega's motion and later discovered that there were limits on when a defendant could be questioned about

his decision to remain silent. (App. 22). Counsel testified that if he had been aware of the cases he reviewed at the time of the trial, he would have certainly objected immediately to the questions asked by the State and would have raised a continuing objection to all subsequent such questions. (App. 22-24).

The trial court denied Vega's post-conviction motion. (App. 4-14). As grounds, the trial court found that the State's questioning of Vega was proper because it was done to impeach Vega. (App. 6-7). Specifically, the trial court found that because Vega testified that he had told law enforcement he didn't know anything about any controlled buys, that it was proper for the State to ask why Vega didn't come forward (after he was notified of the charges he faced), with the explanation for his contacts with the informant after he was provided information about his arrest. (App. 7).

Furthermore, the trial court found that the evidence admitted at trial was overwhelming of guilt. (App. 5-6). Therefore, the trial court found that any error associated with the questions was harmless.

With regard to Vega's ineffective assistance of counsel claims, the trial court found that Vega's attorney did not perform deficiently. As to the questions about Vega's silence, the trial court found that Vega's attorney testified that he did not object as a matter of strategy. (App. 9). Therefore, the trial court found no deficient performance.

Vega now appeals and seeks reversal from this Court. (R. 97).

## ARGUMENT

### **I. The trial court abused its discretion by permitting the State to question Vega regarding his post-arrest, post-Miranda silence, over Vega's objection.**

Vega, like any defendant, had a constitutional right to remain silent after he was arrested, at gunpoint, and read his *Miranda* warnings. *Miranda v. Arizona*, 384 U.S. 436, 86 S.Ct. 1602, 16 L.Ed.2d 694 (1966). Any questioning about why he chose to remain silent after that time or why he didn't come forward to tell his story is impermissible under the Fifth and Fourteenth Amendments. *Doyle v. Ohio*, 426 U.S. 610, 96 S.Ct. 2240, 49 L.Ed.2d 91 (1976).

By permitting the State to question Vega and infer that his testimony at trial was suspect because he did not explain his conduct and innocence to law enforcement, Vega's constitutional rights under the Fifth and Fourteenth amendments of the United States Constitution were violated. Therefore, the trial court abused its discretion in permitting the questioning and Vega should be granted a new trial.

#### ***a. Relevant Law***

The Fifth Amendment provides that no person "shall be compelled in any criminal case to be a witness against himself." U.S. CONST. amend. V. Under the Fourteenth Amendment, no state may violate a defendant's Fifth Amendment right to remain silent. U.S. CONST. amend XIV.

In *Doyle v. Ohio*, the United States Supreme Court held that the use of a defendant's silence, for impeachment purposes, at the time arrest and after having been advised of his right to remain silent, violated the Due Process Clause of

the Fourteenth Amendment. *Doyle*, 426 U.S. 610. Furthermore, “the United States Constitution affords the defendant the right to remain silent at all times, not just during police interrogation.” *Neely v. State*, 86 Wis. 2d 304, 317, 272 N.W.2d 381 (Wis. App. 1978).

Where the State challenges a defendant’s post-arrest, post-Miranda silence during cross-examination, constitutional error exists. *Doyle*, 426 U.S. 610; *State v. Sorenson*, 143 Wis. 2d 226, 262-63, 421 N.W.2d 77 (Wis. 1988). A new trial is warranted unless the State can demonstrate that the error was harmless beyond a reasonable doubt. *Id.*

***b. Vega’s constitutional right to due process was violated when the trial court permitted the State to impeach him with his post-arrest, post-Miranda silence.***

The question presented in this case is virtually the same as the facts presented in *Doyle*. *Id.* The issue presented in that case was summarized as: “whether a state prosecutor may seek to impeach a defendant’s exculpatory story, told for the first time at trial, by cross-examining the defendant about his failure to have told the story after receiving Miranda warnings at the time of his arrest.” *Doyle*, 426 U.S. at 611. The United States Supreme Court held that using the defendant’s post-arrest silence in that manner violated due process. *Id.*

In this case, Vega testified at trial and denied guilt. (R. 111:56). In his defense, Vega claimed that the informant had come to his residence several times because they were friends. (R. 111:23). Specifically, Vega asserted that on the dates of the alleged drug transactions, the informant had come to pay Vega money he owed him and additionally, because the informant claimed he was looking for a card he thought he

had dropped at Vega's residence earlier. (R. 111:29-38, R. 111:40-48).

On cross-examination, the State repeatedly asked Vega why he didn't tell law enforcement his story if he was truly innocent. (App. 29-31). Vega's testimony and the record as a whole reflects that Vega was arrested, he was read his Miranda warnings, and he then declined to speak with law enforcement. (App. 29-30).

Law enforcement asked Vega why he wouldn't have wanted to tell law enforcement that he was innocent. Law enforcement then continued to question Vega about why he didn't make an effort to prove his innocence by speaking with law enforcement prior to trial.

Vega's counsel objected when the question was asked for the third time. (App. 30). However, the trial court overruled Vega's objection. Therefore the questioning continued.

The trial court's ruling to permit the State to question Vega about why he didn't contact law enforcement to explain the informant's presence at his residence and to assert his innocence constitutes an abuse of discretion. The trial court's ruling is in direct conflict with the Fifth Amendment, the Fourteenth Amendment, and with the United States Supreme Court holding in *Doyle*, as well as with Wisconsin precedent. *Doyle*, 426 U.S. 610; *State v. Sorenson*, 143 Wis. 2d 226, 421 N.W.2d 77 (Wis. 1988); and *Neely*, 86 Wis. 2d at 315-18.

***c. The trial court's erroneous ruling constitutes reversible error and Vega should be granted a new trial.***

In addition to Vega's own testimony, Vega solicited testimony in support of his defense through other witnesses. Specifically, law enforcement testified that the drugs Vega allegedly delivered were small (approximately the size of a marble). Although law enforcement testified that the informant was patted down (to search him for drugs), no clothing or shoes were removed. As such, law enforcement conceded that it was possible that the informant could have concealed drugs on his person before conducting the controlled buys.

In addition, Vega's girlfriend, with whom he resided, testified that no drugs were ever kept at Vega's residence. A search of Vega's vehicle, person and residence did not reveal any drugs.

Therefore, whether Vega was convicted was based upon whether the jury believed the informant who claimed he brought money (provided by law enforcement) to Vega's residence on each of the five occasions and exchanged the money for heroin. Alternatively, if the jury believed Vega's testimony to a sufficient degree to question the informant's version of events, the jury could find reasonable doubt about whether the informant had hidden the drugs on his person and tricked law enforcement into believing that Vega provided it.

Vega's credibility was at issue in this trial. By erroneously permitting the State to question Vega about his intentions and the voracity of his defense, for not having made a statement to law enforcement after his arrest and during the pendency of this case, the State wrongfully called

Vega's testimony into question. The State's questions impermissibly challenged Vega's credibility.

As such, the State cannot meet its burden of showing that the error was harmless. *Sorenson*, 143 Wis. 2d at 263. Therefore, Vega should be granted a new trial.

**II. Vega's counsel performed deficiently, by failing to immediately object to questioning about Vega's post-arrest, post-Miranda silence and failed properly renew a continuing objection, which caused Vega prejudice at trial.**

The objection raised by trial counsel to the State's questioning of Vega regarding his post-arrest, post-Miranda silence was ongoing. Trial counsel raised one singular objection, that was neither immediate, nor are the specific arguments made by counsel clear from the record. Furthermore, counsel did not assert a continuing objection. Therefore, counsel's performance was deficient. *Strickland v. Washington*, 466 U.S. 668, 80 L.Ed.2d 674, 104 S.Ct. 2052 (1984)

In addition, should the State argue, or should this Court find, that Vega did not sufficiently preserve the objection regarding the constitutional violation posed by the State's questioning regarding Vega's post-arrest, post-Miranda silence, then Vega's counsel was deficient for failing to do so. An attorney is deficient when his performance is not reflective of an attorney who is well-versed in the legal requirements for the case at hand. *State v. Peardot*, 119 Wis. 2d 400, 351 N.W.2d 172 (Ct. App. 1984).



***a. Relevant Law.***

A defendant has a constitutional right to the effective assistance of counsel. U.S. CONST. amend VI. In order to substantiate a claim for ineffective assistance of counsel, a defendant has the burden to show that both (1) trial counsel's performance was deficient, and (2) that deficiency caused prejudice. *Strickland*, 466 U.S. 668; *State v. Ziebart*, 2003 WI App 258, ¶ 15, 268 Wis. 2d 468, 480, 673 N.W.2d 369.

The standard of review for assessing whether trial counsel's performance was deficient is whether "the ordinary prudent lawyer, skilled and versed in criminal law, would provide such representation to clients who had privately retained his or her services." *Peardot*, 119 Wis. 2d at 403. In examining whether any deficiencies are prejudicial, the standard is whether the error is such that there is a reasonable probability sufficient to undermine confidence in the outcome. *Strickland*, 466 U.S. 668 at 694.

***b. Vega's trial attorney performed deficiently by failing to immediately object and raise a proper, continuing objection to the State's questioning of Vega on cross-examination, regarding Vega's post-arrest, post-Miranda silence.***

A defendant's constitutional right to remain silent and to have his silence not be used against him is a cornerstone constitutional right guaranteed by the Fifth and Fourteenth Amendments. *Doyle*, 426 U.S. 610. In his testimony, trial counsel admitted that he was not fully aware of the gravity or significance of the questions asked by the State on cross-examination o-f Vega and therefore did not immediately

object and raise a continuing objection to the ongoing inquiries.

Trial counsel testified that he did not immediately object when the State inquired about Vega's post-arrest silence. The State asked Vega "I'm assuming because of what your testimony is here today that you didn't sell heroin; you would have wanted to tell the detective that you didn't sell heroin?" (App. 29). Vega's attorney should have immediately objected at that very moment. The question solicited an answer for why Vega didn't want to make a statement to law enforcement.

The Fifth Amendment and the United State's Supreme Court's holding in *Doyle* prohibits such a post-arrest, post-Miranda question. *Doyle*, 426 U.S. 610. The Wisconsin Court of Appeals has applied that holding, finding that such questions attempt to create an inference that "if [a] defendant was innocent, ... he would have told his story earlier" and are unlawful. *Neely*, 86 Wis. 2d at 315.

Trial counsel had a duty to object to such a question, immediately when it was asked, not later. Trial counsel again failed to object to a second question asked by the State on cross-examination immediately following, where the prosecutor asked Vega "[s]o you didn't make any effort to talk to the detective about the fact that you were innocent of these charges?" (App. 29). Once again, the sole purpose of that question is to infer that Vega should have talked to law enforcement when he was presented with the choice to talk or to remain silent.

Additionally, after Vega's objection to the third question was overruled, counsel did not preserve a continuing objection to the additional questions that followed. (App. 29-

30). The State went on to ask additional questions and in total, asked Vega about his choice to remain silent six times.

After the objection was overruled, the State solicited questions from Vega to show the jury that Vega was aware of his defense (in example, the innocent explanation for the informant's presence at Vega's home) at the time he spoke with law enforcement and Vega neither provided law enforcement with that information, nor did he make any effort to inform law enforcement after the attempted interview by law enforcement. (App. 29-31). The State went on to note that Vega would have had an opportunity to explain his story if he had wanted to.

Contrary to the trial court's finding, Vega's attorney did not choose to refrain from objecting as a matter of strategy. To the contrary, trial counsel admitted that he was not aware that post-arrest questions were improper. (Ap. 17-18). Trial counsel admitted that upon review of the applicable law, after Vega filed his post-conviction motion, only then did counsel become aware of the violations committed by the prosecutor. (App. 22).

Counsel admitted in his testimony that he was not well-versed regarding Vega's right not to be challenged with his post-arrest silence and as a result, he failed to protect Vega's right to remain silent. Counsel admitted that if he had known the proper legal standard, counsel would have objected immediately and raised a continuing objection. (App. 22-24).

The trial court's finding that counsel did not perform deficiently is contrary to law and is not supported by the facts of this case. The trial court's finding that counsel did not object as a matter of strategy is a clearly erroneous fact. Furthermore, the trial court's findings would render the

inquiry of a *Machner* hearing meaningless. *State v. Machner*, 92 Wis. 2d 797, 803-804, 285 N.W.2d 905, 908-909 (Wis. App. 1979).

Trial counsel admitted that he was not versed in the law to protect his client's right to remain silent, as a result he failed to promptly object and failed to maintain a continuing objection, which constitutes deficient performance.

***c. Vega was prejudiced by his counsel's deficient performance because the prosecutor was permitted to improperly cross-examine Vega contrary to Vega's right to remain silent.***

To show prejudice, a defendant need not prove that the outcome *would* be different. The test is not an outcome-determinative standard. A defendant could never meet such a burden.

Rather the test set forth in *Strickland* has been called a "guide" in the process of assessing prejudice:

[T]he ultimate focus of inquiry must be on the fundamental fairness of the proceeding whose result is being challenged. In every case the court should be concerned with whether, despite the strong presumption of reliability, the result of the particular proceeding is unreliable because of a breakdown in the adversarial process that our system counts on to produce just results.

*State v. Pitsch*, 124 Wis. 2d 628, 642, 369 N.W.2d 711 (Wis. 1985) (quoting *Strickland*, 466 U.S. at 696). That standard, when applied to this case supports a finding of prejudice.

Vega's right to testify on his own behalf and also preserve the right he had to remain silent after his arrest and

while his case was pending was violated. Vega's constitutional right in that capacity was violated.

The effect of that constitutional violation was that the State was permitted to impeach and challenge Vega's credibility on the grounds that he chose to remain silent. Vega was prejudiced because the State was permitted to call into question his motive to remain silent, when the sole evidence of guilt was based upon the fact that Vega had contact with an informant who later turned over drugs that the informant claimed he got from Vega.

The State's case required the testimony of the informant because no other witnesses saw Vega provide drugs to the informant. As the State's own officers admitted, the drugs that the informant turned over to law enforcement were extremely small and could have been concealed on the informant's body. The audio evidence admitted with regard to the alleged drug transactions revealed that the informant was alone, walking on foot to Vega's residence and other locations where he met with Vega for several minutes before and after each alleged transaction.

Therefore, there is a reasonable possibility that the informant hid the drugs on his person and setup Vega, to avoid criminal prosecution for the stolen property that the informant needed to recover from Vega. Only the jury could decide who was more credible – the informant, or Vega. And the State's improper use of questioning to challenge Vega's credibility undermines confidence in the verdict.

Additionally, the impermissible, unconstitutional violation of Vega's right to remain silent created an unreliable proceeding. This case presents a situation where the adversarial process broke-down because neither the

prosecutor, the Court, nor Vega's attorney protected his right to remain silent alongside his right to testify at trial.

### CONCLUSION

The trial court committed an abuse of discretion in not sustaining Vega's objection when the prosecutor asked Vega about his failure to explain his innocence to law enforcement after he was arrested. Furthermore, Vega's trial attorney was ineffective for not immediately objecting to two earlier questions that inferred Vega's silence undermined his credibility when he testified at trial and Vega's attorney furthermore failed to preserve ongoing objections to the additional questions asked thereafter. In total, the State made six inquiries into Vega's silence after his arrest while the case was pending. In doing so, the State violated Vega's due process right to remain silent at that time. Therefore, Vega urges this Court to overturn the judgment entered in this matter and grant him a new trial.

Dated this 30<sup>th</sup> day of June, 2021.

Respectfully submitted,

/s/ Electronically by Erica L. Bauer

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## CERTIFICATION AS TO FORM/LENGTH

I certify that this brief meets the form and length requirements of Rule 809.19(8)(b) and (c) in that it is: proportional serif font, minimum printing resolution of 200 dots per inch, 13 point body text, 11 point text for quotes and footnotes, leading of minimum 2 points and maximum of 60 characters per line of body text. The length of the brief is 4,547 words.

Dated this 30<sup>th</sup> day of June, 2021.

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**CERTIFICATE OF COMPLIANCE  
WITH RULE 809.19(12)**

I hereby certify that I have submitted an electronic copy of this brief, excluding the appendix, if any, which complies with the requirements of the Interim Rule for Wisconsin's Appellate Electronic Filing Project, Order No. 19-02.

I further certify that a copy of this certificate has been served with this brief filed with the court and served on all parties either by electronic filing or by paper copy.

Dated this 30<sup>th</sup> day of June, 2021.

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