

The DCCA has decided three new criminal cases.

(1) Ingram v. US, No. 02-CF-1272 (DC 10/14/05): The DCCA REMANDED AWIKWA and

related convictions for a hearing, because the trial court refused to admit, as a declaration against penal interest, a third-party jailhouse confession to trial counsel.

(2) Frye v. US, No. 02-CF-1233 (DC 10/14/15): The DCCA held that (1) attempted AAWA and ADW merge; and (2) the defendant had the right to be present at resentencings where terms of supervised release were imposed and increased, but the errors were constitutionally harmless. The DCCA also affirmed the remaining conviction, however, because (3) the trial court did not abuse its discretion in admitting other bad acts evidence; (4) the evidence was sufficient; and (5) there was no prosecutorial misconduct in closing argument.

(3) Sepulveda-Hambor v. US (DC 10/20/05): The DCCA held that the trial court did not abuse its discretion by denying defendant's motion to seal arrest record (even though same judge had acquitted defendant).