Katherine Watts surveys the issue of a whistleblower’s use of information contained in a Freedom of Information Act request to allege and uncover fraud against the government in *United States v. Catholic Healthcare West* (filed Apr. 19, 2006).

Erin Frazor reviews the question of whether membership in a child pornography website supports probable cause to search a defendant’s home computer in *United States v. Gourde* (filed Mar. 9, 2006).

Finally, Michael Vidmar addresses the issue of a crime victim’s right to be reasonably heard during sentencing proceedings in *Kenna v. United States District Court*, an issue of first impression in the Ninth Circuit (filed Jan. 20, 2006).

This survey of Ninth Circuit decisions dealing with contemporary legal problems is the result of the hard work and dedication of the authors, editors, and the entire Golden Gate University Law Review staff. In particular, I would like to extend special recognition to Roxana M. Smith, Ninth Circuit Survey Executive Articles Editor, for her indispensable work in putting together this issue. It has been my pleasure to work with the entire staff of the Golden Gate University Law Review in publishing this Ninth Circuit Survey and the complete Volume 37 of the Golden Gate University Law Review.

Erin Frazor  
*Editor-in-Chief*