

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

2013 SEP 11 PM 4:31
COURT OF APPEALS
STATE OF WASHINGTON
JAMES
13

STATE OF WASHINGTON)

Respondent,)

v.)

Cruz Blackshear)
(your name))

Appellant.)

No. 69912-1-1

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, Cruz Blackshear, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

Additional Ground 2

If there are additional grounds, a brief summary is attached to this statement.

Date: 9-6-13

Signature: Cruz Blackshear

Grounds For Review.

Additional Grounds # 1

contamination issue of pending evidence; In a immunity setting environment? The concealment of pending evidence was never secure; The area should have been locked down, and blocked off.

This "Human Scent track" performed by K-9, as done in a public area. i.e. Hospital, Park and residential housing. Also, approximately more than 45 minutes, after the incident occurred.

The proof of contamination is provided in - Langdon Cross Ex Pg. 197: 22-25, and, Langdon Cross Ex Pg. 198

In: pg. 199: 1-14 K-9 Assistant agreed to have information of two people fleeing, would have been useful info. (As well as all the other people out that afternoon.) The expert analysis:

contamination is later expressed in: VRP pg. 200: 18- as we know - Informational Notice of a potential person suspect was provided in: pg. 204 & 205.

and then a officer stops two people, (that don't match the description) and both people stated they're not aware of the situation, get stopped again - AS a positive ID?

Additional Grounds # 2 In Reid's cross Ex 1.133 20-23 officer Reid states; That he tol

was that Mr. Blackshear was the suspect of
tealing someone's cell phone - which officer Reid
admitted to using "Impermissible Suggestiveness".
I myself consider this "Assumptive Leading" or "profiling"
as well as "unlawful selective categorizing".
When the legal document was tampered with to meet
the officers satisfaction; After in which he provided
an accusation to Ms. Ray. The officer realized
Ms. Ray's statement didn't match his story - so
he destroyed her statement. Ms. Ray then re-wrote the
statement, to meet the standards of officer Reid...
info: Reid cross EX 134: 11-25.

Ms. Ray, also spoke to police outside of
writing her statement. Cross EX pg. 72: 21-25
When officer's "made" her fill out a statement,
to repeat what they said to her. 55:4, 71, 72: 1-9.

Pg. 54: 17 said, she spoke to officer's, because
she didn't want to go to jail.

Additional Grounds # 3 I also made a statement
to the officer, on the day I was being held -
as mentioned; "I wanted a attorney if they were
going to continue to hold me". Marrs direct pg 65
his statement of a cry for help - was misinterpreted
and was then overlooked as sarcasm.

When another officer shows up; Questioning me, passing

Before or After questioning) MARRS Cross EX
3. 71. The officer was unaware I receive full
Miranda, Prior to Showing up. The Same Person
that told me Miranda - was The Same one I told
I wanted a attorney - IF I was going to continue to
be held."

Additional Grounds #4 - on: pg. 13: 6-8 The
Prosecutor indicated, "I have No intentions To
bring up Topics "unrelated" To the actual robbery
incident; in this case." Then later, He made
statistic assumption, of the approximent percentag
of left handed people - To compair to the victim
- myself am ambidextrous, which makes this
"unrelated" overwelming evidencé."

FYI - I never had Two phones, only my one
personal phone. I had a phone charger on me,
that was misinterperated as another phone. (IF anything
- myself engaged with the public, by handing out
church Flyers - An^d doing My civic Dutys. All The
people I tried to speak to, wére people I felt
could save through God, which was my presence
communication & support. OFFICERS could have Found
several more people that afternoon, An completed a line
this whole situation has been a test of My faith
thank you for your time & consideration, among this