

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
COURT OF APPEALS
DIVISION II

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STATE OF WASHINGTON

No. 45143-3-II G
BY DEPUTY

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

STATE OF WASHINGTON)
)
 Respondent,)
)
 v.)
)
 Meko Jones Sr.)
 (your name))
)
 Appellant.)

I, Meko Jones, 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

Violation of Washington Rules of Evidence, ER 701 / Rule 701.

Additional Ground 2

PROSECUTOR MISCONDUCT

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

Date: 2-23-2014

Signature: Meko Jones

2-23-2014

No. 45143-3-II

In The Court Of Appeals Of The State Of Washington
Division Two

State Of Washington,
Respondent,

v.

Meko Deaunte Jones, SR.
Appellant.

On Appeal From The Superior Court Of
The State Of Washington For Pierce County

The Honorable Linda C. J. Lee

Statement Of Additional Grounds

Meko D. Jones SR.
The Appellant

Meko Jones SR. DOC# 745965
G-E-106

Washington State Penitentiary
1313 N. 13th Ave.
Walla Walla, Washington 99362-1065

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WASHINGTON CASES

Cases Of Violating Rule 701.

- ① State Of Washington V. Jaycee Fuller No. 40593-8-II,
169 Wn. App. 797, 282 P.3d 126
- ② State V. FARR-LENZINI (1993) 93 Wash. App 453, 970 P.2d 313

Case Of Prosecutor Misconduct

In Re: Edward Michael Glasmann 175 Wn.2d 696, 286 P.3d
673 (2012)

A. Assignments of Error

1. ON page's 86-111 in the Court Transcripts of [Kayleigh Littlefield Cross Examination] it is clear that the prosecutor tells witness Kayleigh Littlefield, and witness Detective Hoisington to leave out the testimony of ~~the defendant~~ Defendant being high on crack cocaine. ON page 110 of [Kayleigh Littlefield Cross Examination] prosecutor tells ~~the~~ Detective Hoisington to leave out important evidence in his Police Report.

This clearly violates (Rule 701, Washington Rules Of Evidence) and is (Prosecutor Misconduct)

B. Issues Pertaining To Assignments Of Error

1. Rule 701. of WASHINGTON RULES OF EVIDENCE state's that: If the witness is not testifying as an expert witness, testimony in the form of opinions, OR inferences is limited to those opinions OR inferences which are (a) rationally based on the perception of the witness ~~testimony~~ (b) helpful to a clear understanding of the witness testimony OR the determination of fact in issue, and (c) not based on scientific, technical, OR other specialized knowledge within the scope of RULE 702. Witness [Kayleigh Littlefield] was instructed not to give this evidence. This is A violation of RULE 701.

2. Prosecutor told Detective Hoisington to leave out evidence in police report. This is Prosecutor Misconduct.

C. Statement of the CASE

1. I the Defendant Meko D. Jones SR. WAS ON A Crack Cocaine Binge for days, up to the incident at hand. Clearly my drug induced state had everything to do with this case. Me being high had everything to do with the event. Witness [Kayleigh Littlefield] says this to the prosecutor, and defendant's attorney, but WAS NOT allowed to give this testimony on stand, as was [Detective Hoisington].

D. Argument

1. The violation of RULE 701, and Prosecutor Misconduct is evident, and constitutes Reverse and Remand