

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON)
)
Respondent,)
)
v.)
)
ILLYA N. WATKINS,)
(your name))
)
Appellant.)

No. 46124-2-II

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

FILED
COURT OF APPEALS
DIVISION II
2014 OCT -8 PM 1:08
STATE OF WASHINGTON
BY
DEPUTY

I, Illya N. Watkins, 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

See Attached...

Additional Ground 2

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

Date: 9-3-14

Signature: Illya Watkins

Statement of Additional Ground For Review

Additional Ground 1

It is clear the state, and or the sentencing court, miscalculated Watkins offender score by (1) or more points. Even if it's a miscalculation of (1) point, Watkins offender score would be (6) with a sentencing range of 18-22 months. Had Watkins been correctly sentenced to the high end, (22) months, his release date would be December 18, 2014, (approximately.) Less than three months from now. Due to so, Watkins respectfully implares this Court for an expedited review of this appeal. Watkins should not be held accountable and suffer the state's/court's error. The state/court is no layman of the sentencing laws and an error such as this should be dealt with forth-right and the benefit of doing so would avoid possible litigation by Watkins if he is forced to serve additional time due to this sentencing error.

Conclusion

Wherefore, to protect Watkins constitutional rights and to prevent a manifest injustice from occurring, Watkins prays this Court for an expedited review of this appeal. Watkins prays it be so in the interest of justice.

Respectfully Submitted

Dated 9-3-14

Illya Watkins
Illya Watkins

Service

The undersigned hereby swears under the penalty of perjury that a copy of the foregoing has been sent to Thomas E. Doyle, attorney for Watkins, on this 3 day of October 2014, by via regular U.S. Mail.

Illya Watkins
Illya Watkins