

Court Of Appeals  
Division Two  
Of The State Of Washington

FILED  
COURT OF APPEALS  
DIVISION II

2015 APR 17 PM 12:57

STATE OF WASHINGTON  
BINGHAM

DEPUTY

State Of Washington  
Respondent,

✓  
James Sterling Turner  
Appellant,

No: 46611-2-11

Statement Of Additional  
Grounds For Review

I James Turner 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 One

I was manipulated by both of my attorneys; Chuck Ramsdell and Michelle Taylor. Mr Ramsdell had me to believe I had to go through with the felonie binder process. And if I agreed to stay in District Court for an additional month, the

prosecutor (Mr. Dawey) would dismiss this case if he reviewed all the facts and Video. Ms. Taylor told me she didn't want to use ANY of my alibi witnesses at Trial. Because it would look like I was trying to have to prove reasonable doubt and not to stress because Mr. Ramsdell and Mr. Harris (my investigator) were going to testify. They both could testify to what the Victim had said and my witnesses. I told Ms. Taylor I wasn't comfortable with that because if I lost more of my witnesses testimony would be "on the record" and I wouldn't be able to use it in an appeal. Ms. Taylor assured me that that wasn't true and that we have a VERY strong case. "All the jury has to do is View the Video". Neither Mr. Ramsdell or Mr. Harris testified!!!

### Additional Ground Two

Ms. Taylor failed to ask/bring up VERY important questions in front of and/or to the jury. I wasn't asked if I shop at that store or when. Or

where I was during the robbery <sup>or</sup> if I  
 committed the act. Or what I do for  
 work or how much I work. Ms. Taylor  
 didn't ask Ms. Larson (the victim) if  
 I robbed her, or how big the robber  
 was and how she can be so sure  
 about her description. Ms. Taylor didn't ask  
 Detective Keller why he was so sure I was  
 the robber. Ms. Taylor didn't ask Adrienne  
 Taylor (my ex-girlfriend) if I was in  
 Western Washington during the robbery. Or  
 why I had the BB Gun. Or if we  
 were together and when we broke up and  
 when I moved out. Ms. Taylor didn't ask  
 Mr. Ramsdell about the conversation  
 he had with Ms. Larson. Ms. Taylor  
 didn't ask Mr. Harris about any of  
 his research.

### Additional Ground Three

Ms. Taylor failed to bring up any  
 other explanation to why my cigarette  
 butt was at that store and where it  
 was. Or any other interpretation  
 of the video.

## Additional Ground Four

4.

Ms. Taylor didn't move to suppress all the stuff in my backpack, (b.b. Gun) due to an illegal search. How was there a search warrant based on me being a felon when my wallet/identifying papers were zipped up in a pocket, in the bag? And Adrienne had a lease agreement that allowed her to tell Sumner. The Police thought we were trespassing.

## Additional Ground Five

Ms. Taylor didn't even attempt to show the Jury who I am as a Human Being.

I do not feel comfortable bad mouthing or coming down so hard on the Justice System. In my past experiences charges brought against me weren't always accurate. But I was guilty of something. This time their wrong and I feel that the Office of Public Defense in Kitsap County Washington not

S.

only effectively represented me  
but purposely hindered my defense  
of this charge. Thank you for your  
time and consideration.

4-8-15  
DOC # 376745

Sincerely  
James Stone

**CERTIFICATE OF SERVICE**  
I certify that I mailed  
1 copies of SAG  
to R. Sutton, OPA  
& [Signature]  
Date 4/23/14 Signed [Signature]