

1 State V. Finch 137 Wash. 2d 792, 842, 975 P.2d 967

2 US V. Holmes 722 F2d 37 (4th Cir. 1983) Jencks Act is de-
3 signed to provide the defense with access to impeach-
4 ment material, and critical to analysis of alleged violations
5 is whether timing of the disclosure of the material pre-
6 vented its effective use by the defense.

7 US V. Nelson, 27 F3d 199 (6th Cir 1994) When trial judge
8 omits from jury instructions elements offense necessary
9 to find defendant guilty, omission is plain error.

10 US. V. Hove, 52 F3d 233 (9th Cir 1995) Omission of essen-
11 tial element of offense from jury instructions is plain
12 error and cannot be harmless.

13 US V. Beckner 69 F3d 1290 (5th Cir 1995) Defendants right
14 to impartial jury includes right to adequate voir dire to
15 identify unqualified jurors.

16 Taylor V. List 880 F2d 1040 (9th Cir 1989) Sixth Amend-
17 ment right to self representation includes right of access
18 to law books, witnesses and other tools necessary to pre-
19 pare defense.

20 Puett V. Blandford, 912 F2d 270 (9th Cir 1990) Party proceed-
21 ing in forma Pauperis (pro se) is entitled to have summons
22 and complaint served by United States Marshal.

23 US. V. Sanchez 87 F3d 1243 (D.C. Cir 1996) Courts will go to
24 particular pains to protect pro se litigants against conseq-
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1 uences of technical errors if injustice would other-
2 wise result.

3 Peterson 35 Wash. App. at 484, 667 P. 2d 645 Evidence
4 is relevant if a logical nexus exists between the ev-
5 idence and the fact to be established.

6 State v. Childress (1983) 35 Wash. App 314 666 P. 2d 941

7 State v. Larson (1980) 26 Wash. App 564, 613 P. 2d 542

8 State v. White (2007) 141 Wash. App 128, 168 P. 3d 459

9 State v. Smith (1994) 76 Wash. App 9892 P. 2d 190

10 State v. Barton (1981) Wash. App. 690, 626 P. 2d 509

11 State v. Chavez-Romero (2012) 170 Wash. App. 568, 285

12 P. 3d 195

13 State v. Ralph Vernon G. (1998) 90 Wash. App. 16, 950 P. 2d 971

14 State v. Graves (1986) 13 Wash 485, 93 P. 376

15 State v. Darden (2002) 145 Wash. 2d 612, 41 P. 3d 1189

16 State v. Johnson (1999) 90 Wash. App. 54, 950 P. 2d 981

17 Limstrom v. Ladenburg (2002) 110 Wash. App. 133, 39 P. 3d 357

18 State v. Dunivan (1992) 65 Wash. App 728, 829 P. 2d 799

19 State v. Heath (1983) 35 Wash. App 269, 666 P. 2d 922

20 State v. Boyd (2007) 160 Wash. 2d 424, ~~158~~ 158

21 P. 3d 54

22 State v. Thomas (2004) 150 Wash. 2d 821, 83 P. 3d 970

23 In re Brennan (2003) 117 Wash. App. 797, 72 P. 3d 182

24 State v. Blackwell (1993) 120 Wash. 2d 822, 845 P. 2d 1017

1 State v. Coc (1994) 101 Wash. 2d 772, 694 P. 2d 667

2 State v. Judge (1994) 100 Wash. 2d 706, 675 P. 2d 219

3 State v. Jones (1970) 26 Wash. App. 551, 614 P. 2d 190

4 State v. Gallacher (1977) 21 Wash. App. 437, 587 P. 2d 549

5 City of Seattle v. Fetting (1974) 10 Wash. App. 773, 519 P. 2d

6 1002

7 State v. Petrina (1994) 93 Wash. App. 779, 871 P. 2d 637

8 State v. Dingman (2009) 149 Wash. App. 648, 202 P. 3d

9 388

10 State v. Krenik (2010) 156 Wash. App. 314, 231 P. 3d 252

11 State v. Brooks (2009) 149 Wash. App. 373, 203 P. 3d 397

12 State v. Hoffman (2003) 115 Wash. App. 91, 60 P. 3d 1261

13 State v. Cannon (1996) 130 Wash. 2d 313, 922 P. 2d 1293

14 State v. Laureano (1984) 101 Wash. 2d 745, 682 P. 2d 889

15 State v. Rohrich (2002) 110 Wash. App. 832, 43 P. 3d 32

16 State v. Martinez (2004) 121 Wash. App. 21, 86 P. 3d ~~1210~~¹²¹⁰

17 State v. Moore (2004) 121 Wash. App. 889, 91 P. 3d 136

18 State v. Silva (2001) 107 Wash. App. 605, 27 P. 3d 663

19 State v. Hanna (1994) 123 Wash. 2d 704, 871 P. 2d 913

20 City of Seattle v. Orwick (1989) 53 Wash. App. 53, 765 P. 2d 913

21 State v. Fuentes (2013) 172 Wash. App. 755, 295 P. 3d ~~414~~²⁵²

22 State v. Kone (2011) 165 Wash. App. 420, 266 P. 3d 916

23 City of Kent v. Sandhu (2011) 159 Wash. App. 836, 249

24 P. 3d 454

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1 State v. Wilson (2003) 149 Wash. 2d 1, 65 P.3d 657

2 State v. Soh (2003) 115 Wash. App. 290, 62 P.3d 900

3 State v. Moen (2002) 110 Wash. App. 125, 38 P.3d 1049

4 State v. Granacki (1997) 90 Wash. App. 598, 959 P.2d 667

5 State v. Teams (1997) 89 Wash. App. 1, 931 P.2d 1336

6 State v. Michielli (1997) ~~82~~ 132 Wash. 2d 229, 937 P.2d

7 587, 71 A.L.R. 5th 705

8 State v. Kober (1996) 85 Wash. App. 1, 931 P.2d 904

9 Thomson v. Washington Territory (1877) 1 Wash. Ter. 597

10 Johnson v. Canon (1953) 43 Wash. 2d 200, 260 P.2d 873

11 State v. Claflin (1974) 38 Wash. App. 847, 690 P.2d 1188

13
14 I was not given my Discovery until the day
15 before trial (VOLD page 25-59).

16 Video evidence from where three witnesses who took
17 the stand (officer Mehrens, Brian Decker, Sana Ceesay) clai-
18 med the incident first started (Sana claimed I got my injury
19 running away from him there) from behind the Walgreens
20 was not brought to trial.

21 I had to write Kent to get a missing number in
22 my phone time (to reach investigator), and got the letter
23 apologizing and explaining after Oct 13, 2014.

24 I was not given my pro-se packet until Sept 29, 2014.

25 I was not shown video evidence until after my
26

1 scheduled trial date (Oct 13, 2019).

2 I was not allowed to use my "victims" criminal
3 history (in particular his prior crimes of violence)
4 when he took the stand.

5 I was "forced" to refer to videos 1, 2, and 3, as
6 Stabchase not Staff chase videos in front of
7 the jury.

8 The judge allowed officer Mehrans to not give
9 a yes or no answer to the question of is fighting
10 in public against the law when he testified on
11 the stand.

12 Sana claims I threatened him (Africa I am
13 going to get you) in front of officer Mehrans.
14 Trial judge gave my "victim", Sana Coesay a
15 recess in the middle of my questioning him
16 when I took the stand.

17 The judge refused to let Sana read his own
18 written statement on the witness stand. Instead
19 he offered to read it or have me read it. He
20 claimed it would take too much time. (Vol 3 page 108)

21 Officer Mehrans claimed to only be able to access
22 written data and not pictures on his computer.

23 Judge made me hand all documents to ~~the~~ the
24 prosecutor and have him work the computer for me
25
26

1 against my objections.

2 I was not allowed to be present when a
3 continuance was forced on me which is my right.

4 The prosecutor claims parts of Discovery just got
5 in. The day before we began trial.

6 The jury saw me in "orange ankle socks" (assoc-
7 iated with incarcerated inmates).

8 The fact the prosecutor was interrogating me
9 (pumping me for information) when the judge asked
10 him to let me view video evidence before trial.

11 Banco De Credito Indus. Sa V. Tesoria General
12 910 F.2d 827 (5th Cir 1993) Rules of Civil Procedure
13 contemplate that parties will be afforded adequate
14 time to conduct necessary discovery.

15 These facts of my jury trial are a violation
16 of the case laws I have listed. The facts of
17 my jury trial I just listed prove I was denied
18 my right to a fair and speedy jury trial.

19 Petition of Lee (1980) 95 Wash. 2d 357, 623 P.2d 687
20 State v. La Parte (1961) 58 Wash. 2d 816, 369 P.2d 29
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23
24 Sincerely,
25 Michael Shilton
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