

COURT OF APPEALS
DIVISION THREE
OF THE STATE OF WASHINGTON

FILED

OCT 28 2013

COURT OF APPEALS
DIVISION III
STATE OF WASHINGTON
By _____

31529-1

STATE OF WASHINGTON)

Respondent,)

v.)

FRANK BRUNO)

(your name))

Appellant.)

No. 11-1-00986-1

STATEMENT OF ADDITIONAL
GROUND FOR REVIEW

I, FRANK BRUNO, 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

My trial should have been separated from Mr. Gorsky's because I believe the court was prejudiced by the evidence which basically made me guilty by association. I don't believe I was given a fair trial because the court's decision not to separate made me feel that a bench trial was the only fair trial I could receive and that was definitely not the way I would have gone.

Additional Ground 2

The admission of my testimony after it was redacted. It should have been allowed as a whole. Significant portions were edited out leaving holes that my attorney was unable to explain or put forth a logical argument against. The fact that my statement was attached before presented in court is a point of argument in my appeal. I have the right not to testify therefore the use of a redacted statement was wrong.

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

Date: 10-23-2013
Form 23

Signature: [Handwritten Signature]

Additional Ground 3

The Judges Interpretation of Richardson vs Marsh in allowing the Audio and Video that had been altered. The President was to Urge in that this Trial was unique and not subject to the same wide leeway & stated in Richardson vs Marsh