

COURT OF APPEALS  
DIVISION THREE  
OF THE STATE OF WASHINGTON

FILED  
COURT OF APPEALS  
DIVISION II

2016 JUN 20 AM 11:40

STATE OF WASHINGTON )  
 )  
 Respondent, )  
 )  
 v. )  
 )  
 SHANE MARTIN JONES )  
 (your name) )  
 )  
 Appellant. )

STATE OF WASHINGTON  
No. 48362-9-10Y DEPUTY *[Signature]*

STATEMENT OF ADDITIONAL  
GROUNDS FOR REVIEW

I, Shane M. 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

Prior to trial for the current offense, the District Court had determined that the stop and detention of Mr. Jones by Deputy Plummer was a "TERRY STOP." Any evidence from this stop, to include witness testimony by Deputy Plummer and Mavis MacFarland, should have been suppressed under the "fruit of the poisonous tree" doctrine. Mr. Jones was rendered ineffective assistance of counsel when trial counsel failed to move for the suppression of this witness testimony.

Additional Ground 2

The identification of Mr. Jones at trial by Mavis MacFarland should have been excluded. The State's presentation of photograph's to MacFarland for identification of Mr. Jones was suggestive and prejudicial.

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

Date: 6-17-16  
Form 23

Signature: Shane M Jones