

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
COURT OF APPEALS
DIVISION II

2012 NOV 21 PM 12:50

STATE OF WASHINGTON

BY (Signature)
DEPUTY

STATE OF WASHINGTON)
)
Respondent,)
)
v.)
)
KEVAN M. VANSYCKLE)
(your name))
)
Appellant.)

No. 42786-9-II
STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, KEVAN VANSYCKLE, 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

THE FIRST ISSUE THAT I WOULD LIKE TO BRING TO THE COURTS ATTENTION IS, I WAS NOT ABLE TO PROVIDE A PROPER DEFENSE. AS I HIRED A PRIVATE INVESTIGATOR FOR MY CASE BUT WHEN TRIAL TIME CAME SHE COULDN'T BE LOCATED. I HAD TO GO TO TRIAL AS THE JUDGE SAID IN THE COURT ROOM BEFORE TRIAL THAT WE WOULD GO TO TRIAL "NO MATTER WHAT, THERE WILL BE NO MORE EXTENSIONS."

Additional Ground 2

THE SECOND ISSUE IS, THE PROSECUTING ATTORNEY TALK EXTENSIVELY ABOUT MY PRIOR CONVICTIONS FROM MY JUVENILE RECORD. HE EVEN HAD THE PAST VICTIMS COME IN TO TESTIFY. I BELIEVE THAT THE JUDGE SHOW PREDJUDICE IN MY CASE BECAUSE OF MY PAST, AS SHE DID TALK ABOUT MY PAST AND THE RECIDIVISM SO QUICK. WHICH SHE WOULDN'T HAVE KNOWN IF MY PAST WASNT BROUGHT UP. WHICH SHOWS UNFAIR PREDJUDICE.

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

Date: Nov. 16, 2012

Signature: (Signature) KEVAN VANSYCKLE

U.
KEVAN M. WANSYCKRE, APPELLANT;

STATEMENT OF ADDITIONAL
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ADDITIONAL GROUNDS 3

THE THIRD ISSUE IS, THE PROSECUTING ATTORNEY AND THE JUDGE WOULDN'T LET US BRING UP OR TEST THE CREDIBILITY OF ANY OF THE PROSECUTORS WITNESSES. AND IF I HAD TIME TO FIND THE PRIVATE INVESTIGATOR THAT WE HIRED, ~~OF~~ SHE WOULD HAVE BEEN ABLE TO DO JUST THAT. I BELIEVE THAT THAT ALSO VIOLATES MY ABILITY TO PROVIDE A PROPER AND STRONG DEFENSE.

ADDITIONAL GROUND 4

THE FINAL ISSUE IS, THAT, WHEN MY PRE-SENTENCE INVESTIGATION WAS TAKEN PLACE MY RIGHTS WERE VIOLATED. THE INVESTIGATOR, SALLY SAXON, PROCEEDED WITH THE INTERVIEW WITH ME AFTER I ASKED FOR MY ATTORNEY. SHE LIED TO ME AND TOLD ME MY ATTORNEY TOLD HER THAT HE DIDN'T WANT TO BE PRESENT. BUT THE FACT IS MY ATTORNEY SAID ON COURT RECORD AND IN AN E-MAIL TO CCO JOE SOFIA, THAT HE WANTED TO BE PRESENT. WHEN WE BROUGHT THIS UP IN COURT THE JUDGE DID NOT REDACT ANY STATEMENTS I MADE, EVEN AFTER WE ASKED THAT SHE DO JUST THAT, BECAUSE ALL OF THOSE STATEMENT WERE TAKEN IN VIOLATION OF MY CIVIL RIGHT TO HAVE COUNSEL PRESENT. I ASK THE APPEAL COURT TO REDACT ALL STATEMENTS MADE IN THE P.S.I. AS I CLEARLY INVOKED MY RIGHT. THANK YOU.

NOV. 16, 2012

KEVAN VA