

ENCLOSURES EVIDENCE. / TO CLERK: PLEASE FILE THIS

NO. 70712-4-1 (GIVE TO CHIEF LEACH) / date 7-24-14
ACOPY JUSTICE

THE COURT OF APPEALS OF THE STATE OF WASHINGTON

IVAN BARASHKOFF; APPELLANT DIV 1

V.S. PRO SE

STATE OF WASH; RESPONDENT IN FORMA PAUPERIS

RAP 10.10 statement of additional grounds:

RAP: 9.11 additional evidence on review.

RAP: 18.3 withdraw by counsel.

FILED
COURT OF APPEALS
STATE OF WASHINGTON
DIV 1
24 JUL 28 AM 9:29

FACTS: dated ON 1-27-14, signed by JENNIFER WINKLER, for NIELSON, BROMAN & KOCH PLLC.

she sends me her motion to withdraw.

page 8, CONCLUSION "counsel respectfully moves this court for permission to withdraw as attorney of record and permit the appellant to proceed PRO SE."

DATED ON May 29, 2014. I receive a letter/ruling from clerk RICHARD JOHNSON of WASH COA, DIV 1. "that my statement of additional grounds for review 3-6-14 and 5-23-14. Copies are enclosed." this was sent to the prosecuting attorney and myself IVAN BARASHKOFF and WINKLER NIELSON et.

→ (NOW) NEW intervening material FACTS and EVIDENCE have taken place that according to RAP 9.11 (1), (2), (3), (6) FACTS: a motion hearing was set and cancelled. my motions will not be filed or ruled upon. I SHOULD BE RELEASED IMMEDIATELY. I HAVE SERVED THE TIME. please overturn my convictions, rule on all issues I raise. the evidence and MOTION is enclosed. Ivan Barashkoff 7-24-14
[PROOF OF SERVICE] IN JAIL MAIL TODAY; TO CLERK, GIVE TO CHIEF JUSTICE B. LEACH

with I count of harassment; the count II should be dismissed. I HAVE served 18 MONTHS. more than the time I would receive if I were to be convicted.

FILED
13 JAN 22 PM 3:10

KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE NUMBER: 13-1-00833-1 SEA

release me. I have served the time of the alleged crime here.

MOTION TO DISMISS, and release me.

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,)
Plaintiff,)
v.) No. 13-1-00833-1 SEA
IVAN VLADIMIR BARASHKOFF,) INFORMATION
Defendant.)

FILED
COURT OF APPEALS DIV 1
STATE OF WASHINGTON
2014 JUL 28 AM 9:29

COUNT I

I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington, do accuse IVAN VLADIMIR BARASHKOFF of the crime of **Felony Harassment**, committed as follows:

That the defendant IVAN VLADIMIR BARASHKOFF in King County, Washington, on or about January 14, 2013, knowingly and without lawful authority, did threaten to cause bodily injury immediately or in the future to children and staff at the Phinney Ridge Lutheran Church, by threatening to kill children and staff at the Phinney Ridge Lutheran Church, and the words or conduct did place Christina Bogar in reasonable fear that the threat would be carried out;

Contrary to RCW 9A.46.020(1), (2)(b), and against the peace and dignity of the State of Washington.

COUNT II DISMISS COUNT II

And I, Daniel T. Satterberg, Prosecuting Attorney aforesaid further do accuse IVAN VLADIMIR BARASHKOFF of the crime of **Felony Harassment**, a crime of the same or similar character and based on the same conduct as another crime charged herein, which crimes were part of a common scheme or plan and which crimes were so closely connected in respect to time, place and occasion that it would be difficult to separate proof of one charge from proof of the other, committed as follows:

the incident with Stephanie RYDER was 18 years ago, there is NO connection.

A LIE!

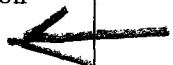
Daniel T. Satterberg, Prosecuting Attorney
W554 King County Courthouse
516 Third Avenue
Seattle, Washington 98104
(206) 296-9000, FAX (206) 296-0955

what happened 18 years ago with stephonia RYDER
has absolutely nothing to do with these church people.

THIS WAS 18 years AGO.

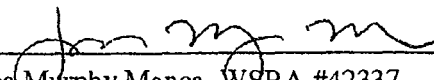
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That the defendant IVAN VLADIMIR BARASHKOFF in King County, Washington, on or about January 14, 2013, having been previously convicted on November 15, 1996, of the crime of Residential Burglary against Stephanie Ryder, a person specifically named in a no contact or no harassment order, without lawful authority, knowingly did threaten to cause bodily injury immediately or in the future to children and staff at the Phinney Ridge Lutheran Church, and the words or conduct did place Christina Bogar in reasonable fear that the threat would be carried out;



Contrary to RCW 9A.46.020(1), (2)(b), and against the peace and dignity of the State of Washington.

DANIEL T. SATTERBERG
Prosecuting Attorney

By: 
Jessica Murphy Manca, WSBA #42337
Deputy Prosecuting Attorney

IN THE SUPERIOR COURT OF WASHINGTON
KING COUNTY

FILED
COURT OF APPEALS DIV 1
STATE OF WASHINGTON
2014 JUL 28 AM 9:29

STATE OF WASHINGTON

CASE NO.

PLAINTIFF

13-1-00833-1SEA

V.S.

PRO SE

IVAN BARASHKOFF

MOTION - FOR HEARING

DEFENDANT

ON 7-23-14

FACTS: pursuant to RAP 6.1(f) "release of defendant in criminal case" - please accept my motion here to dismiss count I I of 13-1-00833-1SEA.

on the "INFORMATION" it states count I. on 1-14-13. I am alleged to committ felony horassment. ///

in count I I the "information" states on 11-15-96. I was convicted of residential burglary against stephonie RYDER. and illegally tries to say the 2 cases are connected in respect to time, place, and occasion, that it would be difficult to seperate proof of one charge from proof of the other. this is a LIE and prosecutorial misconduct. the case with stephonie RYDER happened 18 years ago. it has absolutely nothing to do with the current case. and would be double jperdy to try and count any further actions involving that 18 year old conviction.

→ GO TO PAGE 2 ←

PAGE 2 OF 2

SUPERIOR COURT OF WASH
NO. 13-1-00833-1SEA
— MOTION —

further more: when the superior court dismisses count I & II. /// that leaves 1 count of felony harassment. I have been illegally jailed 18 months for this alleged crime. I have served the time I would get if I were to be convicted. please release me of both counts and ORDER the time has been served.

Ivan Borshoff 7-21-14 (END)

ENCLOSURES

TO : IVAN BARASHKOFF

Date 7-15-14

— SUPERIOR COURT NO. 13-1-00833-1 SEA

Dear Mr Barashkoff : I write to let you know that I scheduled your motion to proceed pro se, per your request. the motion will be heard by judge OISHI on 7-23-14 at 2:30 P.M.. the state is opposing your motion.

take care, KRISTIN M

KRISTIN SHOTWELL, STAFF ATTORNEY,
THE DEFENDER ASSOCIATION DIVISION

(206) 447-3900 EX 544

this is official hand copy of evidence. ENCLOSURES for COA
DIV I, 70712-4-1, MOTION PRO SE dated 7-24-14

Ivan Barashkoff