

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

STATE OF WASHINGTON)
)
 Respondent,)
)
 v.)
)
JAMES T. Woodruff)
 (your name))
)
 Appellant.)

No. 71012-5-1

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

2014 MAR 31 PM 3:59

COURT OF APPEALS
STATE OF WASHINGTON
CLERK

I, JAMES T. WOODRUFF, 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 right of confrontation was compromised in regards to Court (1) one second degree robbery of one Alex Koretsky, Mr. Koretsky did NOT TESTIFY during trial and was unavailable to cross examine AS noted in the Verbatim Report Volume (3) Three pages 383 # 1-25 and page 384 # 1-17

Additional Ground 2

The jury may have seen A MAN in the court room (captioned); threatening A witness/victim A They testified AS NOTED in the Verbatim Report Volume (2) TWO page 124 # 1-25 page 125 # 1-25 page 126 # 1-17, JURORS may have believed the defendant promoted such actions making an ASSUMPTION the defendant was TAMPERING WITH A WITNESS.

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

Date: 3-20-2014

Signature: [Handwritten Signature]

STATEMENT OF Additional Grounds for Review

STATE OF WASHINGTON

Respondent,

v.

JAMES T. WOODRUFF

Appellant.

No. 71012-5-I

Additional Ground 3


COURT STAFF MISCONDUCT AS DISCUSSED
By The Court & ATTORNEYS in THE
Verbatim Report Volume (2) TWO page 254
#4-25 page 255 #1-25 page 256 #1-25
page 257 #1-25 page 258 #1-15

The court downplays the situation
AS WELL AS THE LAW CLERK page 258 #4, 5, 16
when they weren't even in the court
room. page 254 #5, 6, 7, 8, 9, 10. page 255 #2, 3
#15, 16 page 257 #22, 23, 24.

Court staff and clerks should NOT be
discussing the case or issues of alleged
threatening a witness by some unknown person
in the court room especially when jury
members are present.

Page 2 of 8

DATE 3-20-2014


James T. Woodruff

STATEMENT of Additional Grounds

STATE of Washington

Respondent

v.

JAMES T. Woodruff

Appellant.

NO. 71012-5-I

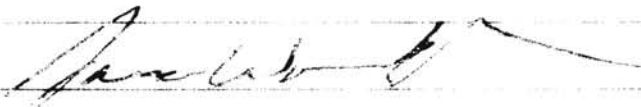
Additional Ground 4

TESTIMONY JESSICA CADIGAN GAVE ON TEXT

COMMUNICATION per VERBATIM REPORT page 177 #7-13
page 179 #14-25 page 180 #1-16 page 181 #9-16 page 194 #19-22
page 204 #14-25 / During Direct questioning of Detective
Stone, Stone testified that after MR Woodruff's
cell phone was searched by a certified digital
electronics extraction detective. Findings from
the investigation during the timeframe of the
robbery that there wasn't any direct contact
or information of any communication between
Woodruff and Cadigan's cell phones. See Verbatim
Report volume (3) three pages 359 #23-25, 360 #1-25
page #370 #9-25, 371 #1-12.

page 3009

Date 3-21-2014


James T. Woodruff

Statement of Additional
Grounds for Review

STATE OF WASHINGTON
Respondent

NO. 71012-5-I

v.

JAMES T. WOODRUFF
Appellant.

Additional Ground 5

Prosecuting Attorney misconduct
manipulating co-defendant/witness into
testifying without counsel: per verbatim
report volume (2) two pages 198 #15-24, 202 #18-22
pages 215 #6-25, 216 #1-12 / Volume (3) three
pages 379 #24-25, Pages 380 #1-25, 381 #1-25, 382 #1-24
page 448 #5-9

Additional Ground 6

Conflict of interest with co-defendant,
witness's Attorney Gerjit Pandher per
verbatim report Volume (2) two page 303 #6-15
MR Pandher was the ACTING Judge in "The
Court" during a prior Sakhomish Co. Superior
court criminal pre-trial Hearings Against
Woodruff in 2009, crime date 12-22-09
Crime of Burglary 1st or VULSA crime date 7-22-11

Statement of Additional
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STATE of Washington
Respondent

v.

JAMES T. Woodruff
Appellant.

No. 71012-5-I

Additional Ground 7

Ineffective Assistance of Counsel

Defendant's Attorney D. CONOM failed to provide the discovery to the case MR. WOODRUFF made verbal requests to Attorney on two separate occasions one response by Attorney CONOM was "It's too Big" noting that the discovery was 600+ pages and 10 DVD'S MOST of which have nothing to do with you, indicating the Defendant MR. WOODRUFF, ONLY after notifying the court in a pre-trial hearing did MR. CONOM allow MR. WOODRUFF to review one page of the discovery in the Attorney's presence.

STATEMENT OF ADDITIONAL
Grounds for Review

NO. 71012-5-I

STATE OF WASHINGTON
Respondent

NO. 71012-5-I


JAMES T. WOODRUFF
Appellant

ADDITIONAL Ground 8

INSTRUCTION NUMBER 8 FOR THE JURY
"ACCOMPLICE ACCOUNTABILITY" UNDER WHICH
THE JURY FOUND WOODRUFF GUILTY OF 2^o
ROBBERY SEE "STATES CLOSING ARGUMENT" IN
VERBATIM REPORT VOLUME 3) THREE PAGE
418 #8-25, 419 #1-9, #22-23 / DEFENDANT'S
CLOSING ARGUMENT IN THE VERBATIM REPORT
VOLUME (3) THREE PAGES 427 #25, 428 #1-13
PAGE # 434 #12-17 / STATES REBUTTAL VERBATIM REPORT
VOLUME (3) THREE PAGES 447 #6-25

NO OTHER DEFENDANTS WERE CHARGED WITH
2^o ROBBERY THERE FOR WOODRUFF SHOULD NOT
HAVE BEEN FOUND GUILTY UNDER ACCOMPLICE
CLAUSE.

Dec 3-22-2014


James T. Woodruff

STATEMENT OF Additional
Grounds for Review

STATE of Washington

Respondent

v.

JAMES T. WOODRUFF

Appellant

No. 71012-5-1

Additional Ground 9

closed Hearing / Bone Club Review

Verbatim Report volume (2) two pages 299# 24-25

Additional Ground 10

INACCURATE BRIEF OF APPELLANT AS
Prepared By Attorney For APPELLANT
MR. ERIC J. NIELSEN

DETECTIVE TESTIFIED THERE WAS NO
EVIDENCE TO PROVE CADIGAN TEXTED
WOODRUFF AT WOODRUFF TO CADIGAN. YET
IT IS MENTIONED IN BRIEF PAGE #2 FOURTH
PARAGRAPH. PAGE #3 MIDDLE OF FIRST PARAGRAPH
BRIEF STATES "WOODRUFF THEN ASKED CADIGAN WHERE
THE KEYS TO KORETSKY'S CAR WERE," REFER TO
VERBATIM REPORT PAGE 184# 7-11 QUOTE "THEY
KEPT ASKING WHERE THE KEY WAS" "WHO'S THEY"
"THE BOYS THAT WERE THERE" "INCLUDING WOODY?" "YES"

Date 3.11.2011

[Signature]

Additional Ground 10

Continued from page 7

On page # 3 of Brief Third paragraph it states "Roulberry admitted he told police Cadigan brought up robbing Franco and Korotky and she wanted Roulberry, Petty and Woodruff to back her up." refer to Verbatim Report Volume (3)


Three page # 349 Nowhere on the referred page does it state anything remotely close to what Brief implies.

Woodruff never stated "I'm guilty" it was only implied by Detective Chissus and it was only a interpretation of what woodruff might of said not a direct quote.

Finished signed and Dated

By James T. Woodruff

3-23-2014



**IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE**

STATE OF WASHINGTON)	
)	
Respondent,)	
)	
vs.)	COA NO. 71012-5-I
)	
JAMES WOODRUFF,)	
)	
Appellant.)	

DECLARATION OF SERVICE

I, PATRICK MAYOVSKY, DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOLLOWING IS TRUE AND CORRECT:

THAT ON THE 29TH DAY OF MARCH, 2014, I CAUSED A TRUE AND CORRECT COPY OF THE **STATEMENT OF ADDITIONAL GROUNDS FOR REVIEW** TO BE SERVED ON THE PARTY / PARTIES DESIGNATED BELOW BY EMAIL AND/OR DEPOSITING SAID DOCUMENT IN THE UNITED STATES MAIL.

[X] SNOHOMISH COUNTY PROSECUTOR'S OFFICE
3000 ROCKEFELLER AVENUE
EVERETT, WA 98201
Diane.Kremenich@co.snohomish.wa.us

SIGNED IN SEATTLE WASHINGTON, THIS 29TH DAY OF MARCH, 2014.

X *Patrick Mayovsky*