

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON)
)
 Respondent,)
)
 v.)
 Nicholas Robles)
 (your name))
)
 Appellant.)

No. 46587-6-II

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

FILED
COURT OF APPEALS
DIVISION II
2015 FEB 17 PM 2:50
STATE OF WASHINGTON
BY DEPUTY

I, Nicholas Robles, 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

I. BATSON ISSUE - Only Black juror dismissed

II. INEFFECTIVE ASSISTANCE OF COUNSEL

- a. No cross examination of complaining witness regarding inconsistent statements
- b. No cross examination as to statutory rape (pregnancy while under age.) husband must have had relations with her prior to her coming of age
- c. Discovery violations - recorded interview i. Omnibus 2/28 asked for video recording
- d. Leading questions not objected to
- e. Improper recollection foundation

Additional Ground 2

- f. Improper impeachment of own witness
- g. While intent is not required, no defense regarding assertion of age was presented
- h. No cross examination on access to camera by complaining witness so as to have ability to recall and recollect diagram of accused's home
- i. Alternate theories not presented

III. PROSECUTOR MISCONDUCT a. Discovery Violations

- b. No Production of audio recording
- c. No 3.5 hearing on statements of the accused

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

Date: 2/11/2015

Signature: [Handwritten Signature]