

Beland-Jordan #231085  
pro-se supplement

These are reasons I feel my conviction  
should be overturned. No. 72728-1

I.

The charging information was ambiguous to the point I never really knew what I was being called upon to defend myself against, and quite literally "bended itself" to make them one interpretation. On the one hand it says that I, "knowingly and without lawful authority (a confusing enough statement in itself), did threaten to cause bodily injury immediately or in the future to Dr. Shaw, (are we here talking about Dr. Shaw as an individual?)" And then, "by threatening to kill all these other people, who were also Plaintiffs in this matter. Or is it meant to say that I threatened Dr. Shaw and the rest of these people. Is it that Dr. Shaw felt threatened because she claims to have overheard me threaten these other folks. In other words she is implying Dr. Shaw is everybody.

When I brought these discrepancies to

The judge, she called on the prosecutor to provide the Court with a "bill of particulars" which the prosecutor never came up with. My position then and now is that the statute itself should be pulled for vagueness, as I never knew what precisely I was being called upon to defend against. (see exhibit 1)

## II.

It was an abuse of the trial Court's discretion to give witness status a two month continuance over my objection, and also a violation of Cr. 3.3.(a), and Cr. 3.3.(H). At that point the charge should have been dismissed with prejudice.

## III.

I feel it was a ~~so~~ violation of the rules of discovery for me not to have been provided with discovery until two weeks before my trial date. Particularly troubling for me was not having seen the police video of my arrest until ~~so~~ late. These events were so traumatizing to me until I apparently had them suppressed. Before

actually having opportunity to see the police video the memory to me of what actually happened was gone so my plea was temporary insanity, but after seeing the video, and having it brought back to mind my attitude and plea changed. I conclude that I was severely prejudiced by not having been provided with this vital discovery.

W.

I do not believe lawmakers intend by the SRA to create a situation where misdemeanors and felonies intersect. The SRA is a law delineating how we treat felons in felony courts. In other words, the topic of SRA law is a topic that only addresses felony behavior. The subtext, without us having to be constantly reminded through reiteration in the text, is FELY. The legislature never intended by SRA revisions and updates to give prohibitive value to misdemeanors in felony courts, then we use a misdemeanor to stop felons from washing out, that is exactly what we're doing, giving misde-

means probative value in felony courts.

If the court in its wisdom would decide that giving probative value to misdemeanors in felony courts is indeed what the legislature intended, it would amount to a bright line new rule that could not have been anticipated and which, under traditional retroactive analysis should be applied prospectively only.

Respectfully submitted,

Richard Jordan

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Wilmington St. Kentuckiana

1313 N. 13<sup>th</sup>

Walla Walla, Wn.

99362

Exhibit #1

**CERTIFIED  
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KING COUNTY  
SUPERIOR COURT CLERK  
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CASE NUMBER: 13-1-12957-1 SEA

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SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

THE STATE OF WASHINGTON,	)	
	Plaintiff,	)
v.	)	No. 13-1-12957-1 SEA
	)	
LELAND ALFRED JORDAN,	)	INFORMATION
	)	
Defendant.	)	

I, Daniel T. Satterberg, Prosecuting Attorney for King County in the name and by the authority of the State of Washington, do accuse LELAND ALFRED JORDAN of the following crime[s]: **Felony Harassment**, committed as follows;

Count 1: Felony Harassment

That the defendant LELAND ALFRED JORDAN in King County, Washington, on or about September 19, 2013, knowingly and without lawful authority, did threaten to cause bodily injury immediately or in the future to Dr. Sachita Shah, by threatening to kill Cynthia Ruiz-Seitzinger, Diane Fullerswitzer, Levena Barlow, Sachita Shah and Vincent Smith, and the words or conduct did place said person 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:



Paul G. Sewell, WSBA #43090  
Deputy Prosecuting Attorney

Daniel T. Satterberg, Prosecuting Attorney  
CRIMINAL DIVISION  
W554 King County Courthouse  
516 Third Avenue  
Seattle, WA 98104-2385  
(206) 296-9000 FAX (206) 296-0955

INFORMATION - 1

Richard Jordan # 2310855

Feb. 7, 2016

110.72728-1

Dear Clark,

This is the absolute best I can do under the circumstances which seem to be getting more bizarre with each passing day. The prison is on lockdown now.

I have this paper done and found out that I could have created a postal debt and forwarded copies, except that I have not, since the lockdown has been able to access the person who does the copying.

I feel that I have to wait this, all that I've got today. If full service is such a great move and you are willing to add it back, I will thereafter see to it that all parties are settled.

These find enclosed the schedule for

# Washington State Penitentiary

## Golf UNIT Offender Notification

Operational Period 02/04/16 @ 1600 to 02/05/16 @ 0600

***Deviations to this plan require the Authorization of the Incident Commander***

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Inmate Workers – No unit workers allowed during this operational period.

Education – No attendance of education classes is authorized during this operational period.

Dog Program – No dog handlers are authorized to be out during this operational period.

Meals – Meals will be served at cell front by staff.

Health Care – All inmate movement will be restrained.

- Pill line - Health Care staff will be escorted down the tier by staff.
- Diabetic services - Will be provided by Health Services three times daily escorted by staff.
- Mental Health - As normal. If an emergency request exists, unit staff will contact MHU.
- Emergency medical needs will be assessed by medical personnel, as required.

Showers – No Showers during this operational period.

Telephone Calls – No telephone calls during this period. Legal phone calls will be requested through the Unit Manager and approved through the Incident Commander.

Laundry – No laundry services during this operational period

Recreation – No Recreation during this operational period.

Mail – Mail will be delivered and picked up at cell front.

JPay/KIOSK – No access during this operational period.

Property/Clothing Room – No property/clothing will be issued during this operational period.

Store Order/Delivery – Any store or package deliveries will be delivered at cell front by staff

Law Library Access – Offenders with verifiable deadlines, not already on Priority Scheduling, as per 590.500 may request priority scheduling by submitting form DOC 02-247 to the Law Librarian. Clearance to the Legal Library will be determined on a case-by-case basis by the Law Librarian in coordination with the Incident Commander.

Video Visiting/Visiting – No visiting or video visiting during this operational period.

Classification – No callouts will take place during this operational period.

Religious Service - Facility Chaplain will complete a walk-through of the unit on a daily basis. No religious call outs are authorized during this operational period.

Hearings/Ad Seg and Disciplinary – No Hearings during this operational period.

Incident Commander: \_\_\_\_\_

*Det. Donald Boyer*

Date: \_\_\_\_\_

*2-4-16*