62968-9

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FILED
COURT OF APPEALS DIV I
STATE OF WASHINGTON
2009 OCT 27 AM 10: 45

STATEMENT OF ADDITIONAL GROUNDS FOR REVIEW

STATE OF WASHINGTON)
)
Respondent,)
)
v.)
LINKON C BROWN JR)
(your name))
)
Appellant.)

No. 62968-9-I DIV

STATEMENT OF ADDITIONAL GROUNDS FOR REVIEW

I, LINKON BROWN, 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

PLEASE SEE ATTACHMENT

Additional Ground 2

PLEASE SEE ATTACHMENTS

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

Date: 26 OCT 09 Signature: Linkon C Brown

GROUND I

MY ATTORNEY WAS INFECTUAL BY NOT CALLING THE MGR OF THE HOTEL. HE WOULD HAVE VERFIED THAT HE HAD SPOKE WITH MR BROWN AND KNEW THAT THE $200 WOULD be PLACED ON DENIS BOWERS ACT AND REMOVE MR BROWN AND HIS CARD!. HE HAD GIVEN US A TIME LIMIT before HE WOULD RUN MY CARD!! WITHOUT HIS TESTIMONY THE STATE WAS ABEL TO TELL THE JURY THAT THAT WAS MY MONEY. THE MGR WAS A BLACK MAN.

GROUND II

MY ATTORNEY WAS INFECTUAL BY NOT STATING MR BROWN WAS DULY LIC TO ESCOURT IN THE STATE OF WASHINGTON AND THE PROSECUTION SAY'S THAT ALL ESCOURTS PROMOTE PROSTUTION. THEN WHY GIVE LIC TO ESCOURT IF THE STATE BELIVES WHAT IT SAY'S.

GROUND III

MY ATTORNEY WAS INEFFECTIVE CAUSE HE DIDN'T REFERAL X REMIND THE JURY. YES MR BROWN OWNS ESCOURTING LIC YES THE LADY USED HIS PHONE POSTED ADS ON HIS SITE. BUT SHE DIDN'T WORK FOR HIM. EVERY ONE THAT MAKE XXX MOVIES FOLLOWS ENTERPRISE MUST FILL OUT PAPER WORK AND KEEP IT ON FILE!! DENIS BOWERS HAD RECENTLY BEEN RELEASED FROM CUSTODY AND LIVED IN EVERETT WASHINGTON THEN. HER MOTHER WORKED FOR THE AGENCY. DENIS CAME TO VISIT HER MOTHER ASK COULD SHE USE OUR PHONE AND SITE AND COULD I HELP HER GET ROOM AND SHE WOULD PAY FOR IT. I TOLD HER I DIDN'T HAVE ANY MONEY. SHE SAID USE MY CARDS AND TAKE THE MONEY PUT IT ON HER ACT IN HER NAME AND REMOVE MY NAME. I AGREED AND CONFIRMED THIS ARRANGMENT WITH THE BLK NIGR!! BUT HE DIDN'T CALL HIM TO SUPPORT MY CLAIMN. TOLD THE POLICE THE NIGR IS WAITING ON THIS MONEY OR WE WILL GET KICKED OUT!! ON RECORD!!

GROUND IV

MY ATTORNEY WAS INEFFECTIVE BY NOT ALLOWING DENIS BOWERS TO TESTIFY. WE FIND LETTERS AND E-MAILS THAT CLEARLY SHOWS DENIS BOWERS WANTED TO TESTIFY. WITHOUT HER TESTIMONY HER INCOME TAX RETURN FOR 2007 WAS NOT ALLOWED IN THE RECORD. IT CLEARLY SHOWED SHE MADE OVER 20,000 INDEPENDENTLY BUT NOT FROM LPBB. ENTERPRISE. SHE WAS NOT ALLOWED TO SAY SHE DIDN'T WORK FOR MR BROWN. SHE WAS NOT ALLOWED TO TELL THE JURY ABOUT THE ARRANGEMENT THAT WAS MADE WITH THE MGR ABOUT ~~#~~ THE $200 !!! WHICH WAS ALL GOING TO HER AND ON HER ACCT AS PREARANGED.

GROUND V

MY ATTORNEY WAS INEFFECTUAL BECAUSE FAILED TO CALL ANY OF MY WITNESS. LENOTTA COOKE PENNIE BREADMORE, JUNITA WILLIAMS, DENIS BOWERS AND LISA ELLIS. DIDN'T INTERVIEW, MEET OR PREPARE THEM TO SUPPORT MY CASE. LENOTTA COOKE FLEW UP HER FROM L.A. CA TO TESTIFY ON MY BEHALF AND HE WOULDN'T MEET OR TALK TO HER. PENNIE BREADMORE DROVE FROM SAN-DIEGO TO TESTIFY ON MY BEHALF HE DIDN'T CALL HER AND SHE CAME TO THE COURT ROOM OUTSIDE AND HE DIDN'T CALL HER THIS COURT HAS LETTER AND MY ATTORNEY HAD PHONE CALLS FROM JUNITA WILLIAMS THAT SHE WANTED TO TESTIFY IN MY BEHALF HE WOULDN'T ANSWER OR RETURN JUNITA'S CALLS. WHAT CHANCE DOES A DEFENDENT HAVE IF HE IS NOT ALLOWED TO PRESENT WITNESS TO SUPPORT HIS CASE? ALL KNEW DENIS HAD JUST GOTTEN OUT OF CUSTODY! PENNIE BREADMORE VISITED HER WHEN SHE WAS IN CUSTODY AND ALL KNEW SHE WAS INDEPENDENT BUT THE JURY NEVER HEARD THEM.

GROUND VI

MY ATTORNEY WAS INEFECTIAL BECAUSE HE NEVER INTERVIEWED, CONSULTED WITH ANY OF MY WITINESS. HOW CAN YOU PREPARE A CASE WITHOUT INTERVIEWING WITINESS? I REQUESTED MY WITINESS BE ALLOWED TO TESTIFY. MY ATTORNEY DENIED ME THAT RIGHT. I MUST BE ALLOWED TO CALL MY WITINESS SO I CAN DEFEND MY SELF. I AM THE ONE THAT DOES THE TIME IF CONVICTED SO I MUST BE ALLOWED TO CALL MY WITINESS!! MR BRIAN TODD REFUSED AND THEREFORE NULLIFIED MY DAY IN COURT!

GROUND VII

MY ATTORNEY WAS INEFFECTIAL BY NOT OBJECTING TO THE JUDGE DENIEING DENNIS BOWERS TO TESTIFY IN HER COURT!! I RAISED THE POINT THAT WITHOUT MY KEY WITINESS I WAS DEAD IN THE WATER! HE WAS TO SAY THE LAW SAY'S NO DEFENDENT ACCUSED OF A CRIME SHALL BE DENIED COMPULSORY PROSSES I WAS!!

GROUND VIII

MY ATTORNEY WAS INEFFECTIVE BY NOT OBJECTING TO THE STATE PUTTING NO CONTACT ORDER ON DENNIS BOWERS, DEDRA BOWERS, LISA ELLIS. THE STATE WASN'T GOING TO CALL MY WITNESS BUT THEY WANTED TO MAKE SURE I WOULDN'T BE ABLE TO PREPARE MY DEFENCE AND HAVE MY WITNESS PRESENT

GROUND IX

MY ATTORNEY WAS INEFFECTIVE BY NOT OBJECTING TO ANNA BEASLEY TESTIMONY. SHE DID NOT KNOW ANY OF US IN 2007 OR THE TIME OF THE INCIDENT. SHE MET US IN MAY 2008. SHE CONNECTED ALL THE EXE'S FOR THE STATE. SHE TALKED ABOUT HOW SHE WORKED FOR CPBB ENTERPRISE AND WORKED WITH DEDRA AND DENNIS BOWERS. THE JURY HEARING THE STATE SAY MR BROWN OWNS ESCORTING LIC ANNA BEASLEY SAYING SHE WORKED WITH DEDRA & DENNIS. HE SHOULD HAVE ASKED HELL DID YOU KNOW MR BROWN IN 2007. SHE WOULD HAVE SAID NO!! BUT HE DIDN'T AND JURY THOUGHT I LIED

GROUND X

THERE ARE 4 FACTORS TO THE SPEEDY TRIAL RULE. LENGT & REASON NOT TO BE THE KEY FACTOR!! THE STATE REQUESTED AN EXTENION REPEATLY AND WAS GRANTED THEM. HOWEVER CERTAIN THING WERE GUARENTEED TO ME BY THE COURTS FOR GRANTING THE EXTENION. LET ME SAY I OBJECTEDED, VERBALY AND REFUSED TO SIGN WAIVER. IT WAS AGREED AND UNDERSTOOD THAT THIS GRANTING OF EXTENIDIX WOULD NOT BE HARMFUL OR PREJUDICE TO THE DEFENCE. THE STATE INTRODUCED ANNA BEASLEY AS A WITNESS AFTER BEING GRANTED AN EXTENTION. WE SHOULD HAVE GONE TO COURT IN MAR 08 BUT DIDN'T TILL JUN 08. ANNA BEASLEY WAS NOT ON ANY WITNESSLIST BUT THE STATE USED HER TO TIE ME AS A LIAR!! SHE SHOULD NOT HAVE BEEN ALLOWED TO TESTIFY!! THIS COURT RULED ON A SIMILAR CASE LIKE THIS EARLIER. YOUR RESPONCE WAS THE STATE COULD HAVE REFILED THERE WAS TIME!! BUT THEY DIDNT YOUR RULING DISMISS WITH PREJUDISUM.