65647-3 65647-3 ①

STATEMENT OF ADDITIONAL GROUNDS FOR REVEIW

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| STATE OF WASHINGTON<br>Respondant<br>VS.<br>ROBERT C. KEENAN<br>Appellant | NO. CDA No. 65647-3-I<br><br>Statement of Additional Grounds for Review |

I Robert Keenan have received and reviewed the oppening 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 Addtional grounds for review when my appeal is considered on the merits.

FILED
COURT OF APPEALS DIV. III
STATE OF WASHINGTON
2011 FEB 10 AM 10:

Additional Ground I

Inefective assistance of counsel.
I was greatly prejudiced by having Mrs ODama as my counsel. During the course of The trial motions, I tried to assert questions to the officer and make statements to the Judge. I was told by Honerable Judge Ramsdell to write The questions & or statements Down for Mrs. ODama to Address. These were critical and time related points that needed to be addressed as such. Counsel never read the questions/statements ~~and~~ until after the motions were decided. At this point my information was useless. My counsel did not even make any objections to the evidence not being tested by our side nor would she state Mr. Keenans desire to do so.
I was not even given the chane to watch The D.V.D. of The arrest by my counsel, because of ~~The~~ her office's player was broken. I by my request, was granted a little time

durring trial but not enough to even finish it, which was also not arugued by counsel. Mrs. ODama would not argue for more time to prepare. I had no opportunity to read the discovery. Defence had no continuences of there asking period during any portion of the entire proceedings. Mainly the most damage was done by not asking, asserting, or even reading Mr. Keenans questions. I understand she has a lot on her hands during the proceedings But by counsel's mentaly dismissing any of my questions/statents. Therefore not taking the time to read them had a direct effect on the outcome of The case.

Again during motions the DVD was not working and no objection was made by counsel. The D.V.D would show I was driving west not East as officer Mulloy stated. Again if Mrs. ODama was properly prepared she would have known this. This was also wrote down for her to ask but never read or asserted. (pg. 23) verbatem report of proceedings. (pg. 40) Also States exibit 3. (Drawing by officers of Mr. Keenans car direction of travel & turing into 711 parking lot) This was never brought up because I was barred from speaking directy.

I was greatly prejudiced by Counsels very unthorough preperation and lack of assering the importance of my information, I tried to present her throughout the proceedings. I felt that the motions were my best opportunity for dismisal through sapression. Once They were wasted by Counsels neglect I was Forced to take a stipulated trial.

Conclusion:

The confict of interest to overall outcome of the case. Thus she did illistrate dillegence or effectively reprent my rights.

Ground II.
The trial court erred when it refuced The defence The right to test The evidence.

Conclusion.

Due to mr Keenans inefective assitence of counsel and defences lack of opportunity to test The evidence this court should reverse my conviction and remand back to the trial court.

Respectfully submitted by.

Robert K
Robert Keenan. 2-6-11

Certificate of mailing.

On 2-6-11 I deposited 1 true and correct copy of ADDition grounds for relief. in the U.S mail. to C.O.A DIV. I one union square. 600 University str. Sea. wa. 98101-4170

I herby swear this is true & correct.

Robert K
Robert Keenan
02-06-11