

67409-9

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STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

FILED
COURT OF APPEALS DIV I
STATE OF WASHINGTON
2012 APR -5 AM 11:10

STATE OF WASHINGTON)

Respondent,)

v.)

Raymel Curry
(your name))

Appellant.)

No. 67409-9-1

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, Raymel Curry, 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

The trial court committed error which deprived me of fundamental constitutional guaranties by failing to provide jury instructions for the burden of proof as well as defining what reasonable doubt was. In the report of proceedings for May 24, 2011 on pages 5-6 the prosecutor states that they didn't print out the burden of proof, nor did they define the "Beyond a reasonable doubt," standard.

Additional Ground 2

The trial court committed error which violated my rights to a fair trial with the jury instructions of WPIIC 20.01 which included the language "To tell right from wrong." The Crenshaw court stated, "We hold prospectively that as a general rule no definition of wrong should accompany an insanity ~~def~~ instruction. The trial court mis-applied the M'Naghten test.

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

Date: April 2nd, 2012

Signature: 

RAYMEL CURRY #821654 CH-C-6-1
AIRWAY HEIGHTS CORRECTIONS CENTER-MSU
P.O. BOX 2049
AIRWAY HEIGHTS, WA. 99001-2049

APRIL 2nd, 2012

I, RAYMEL CURRY, DO CERTIFY PROOF
OF SERVICE OF MY STATEMENT ON
ADDITIONAL GROUNDS ON CASE NO. COA
07409-9-I, THAT A COPY HAS BEEN
SENT TO MY ATTORNEY AS WELL AS
TO THE PROSECUTOR.

FILED
COURT OF APPEALS DIV 1
STATE OF WASHINGTON
2012 APR -5 AM 11:09

Sue M. Bier
NOTARY
4-30-12
Commission Expires



SINCERELY,
