71191-1

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STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

STATE OF WASHINGTON	)	
	)	
Respondent,	)	
	)	No. 71191-1
v.	)	
	)	STATEMENT OF ADDITIONAL
CORNELIUS RITCHIE	)	GROUNDS FOR REVIEW
(your name)	)	
	)	
Appellant.	)	

I, CORNELIUS RITCHIE, 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

INEFFECTIVE ASSISTANCE OF COUNSEL

Additional Ground 2

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

Date: 10-4-14 Signature: Cornelius Ritchie

STATEMENT OF ADDITIONAL GROUNDS

INEFFECTIVE ASSISTANCE OF COUNSEL AGAINST TRIAL LAWYER CARL MUNSON FOR THE FOLLOWING REASONS.

FILED
COURT OF APPEALS DIV I
STATE OF WASHINGTON
2014 OCT -8 AM 11:

1) FAILURE TO USE EVIDENCE THAT IF HEARD WOULD OF STRONGLY IMPACTED THE JURY AND DESTORYED THE STATES THEORY ON WHAT THEY CLAIM HAPPENED AND WHAT I DID.

THIS EVIDENCE THAT WOULD OF BEEN ENOUGH TO REACH A VERDICT OF NOT GUILTY AND THAT WAS CRUCIAL TO MY DEFENSE, IS A DISK RECORDING OF MY DOC VIOLATION HEARING FROM MAY 30TH 2014.

ON THIS DISK, GRACE SCHULTZ, MY DOC OFFICER, AND THE STATES MAIN WITNESS, UNDER OATH, GIVES SWORN TESTIMONY ABOUT EXACTLY WHAT I WAS ON TRIAL FOR.

SHE TESTIFIES UNDER OATH THAT I WAS NOT OUT OF HER SIGHT WHILE ON TRAIL. SHE ALSO TESTIFIES THAT THE ITEMS IN THE BUSHES WERE ALREADY THERE WHEN I WALKED UP TO THE BUSHES. SHE ALSO STATES SHE DONT KNOW WHETHER OR NOT IF I KNEW THESE ITEMS CONTAINED DRUGS.

BECAUSE OF THE CONTENTS OF THIS DISK, I WAVED MY SPEEDY TRIAL RIGHTS TO MAKE SURE I HAD IT TO USE ON MY BEHALF IN TRIAL. MR. MUNSON ALSO SAID IT WAS "PARAMOUNT" TO MY DEFENCE AND PAID THE MONEY TO HAVE A COPY MADE AND SENT TO HIM.

IN TRIAL THE CONTENT OF THE DISK WAS NOT PLAYED FOR THE JURY TO HEAR. THE TESTIMONY ON THIS DISK WAS NOT EVEN BROUGHT UP TO GRACE SCHULTZ WHEN SHE TOOK THE STAND ALLOWING HER TO SAY OR NOT SAY ANYTHING SHE WANTED. IF USED, IT WOULD OF PREVENTED THE PROSECUTOR FROM TELLING THE JURY HOW I CARRIED IT THERE AND PUT IT THERE TO STASH IT BEFORE I WENT TO THE DOC OFFICE.

MY LAWYER FAILED ME IN NOT USEING THIS ON MY BEHALF AND DID NOT DO HIS JOB IN GIVING ME THE BEST DEFENSE POSSIBLE.

2) FAILURE TO OBTAIN AND USE EVIDENCE THAT WOULD, IF HEARD, CHANGED THE OUTCOME OF MY TRIAL.

IN THIS, MR MUNSON FAILED TO OBTAIN THE GPS RECORDS FROM GRACE SCHULTZ THAT TRACKED MY MOVEMENTS IN REAL TIME FROM THE DAY I WAS RELEASE. THESE GPS RECORDS WOULD OF GIVEN AN EXACT POSITION AND TIMELINE (SOMETHING JURY ACTUALLY STATED AFTERWARDS THAT THEY WISHED THEY HAD) OF MY WHERE ABOUTS.

GRACE SCHOLTZ DIDNT WANT TO GIVE THESE TO MR. MUNSON AND THEREFORE DIDNT GIVE THEM TO HIM. SHE IGNORED HIM, HE GAVE UP AND STOPPED TRYING. I AM THE ONE WHO WANTED THIS TO BE EVIDENCE ON MY BEHALF WHICH HE AGREED WAS IMPORTANT TO MY DEFENSE FOR IT WENT HAND AND HAND WITH THE DISK FROM MY DOC VIOLATION HEARING.

THESE GPS RECORDS WOULD OF PROVEN

BEYOND DOUBT THAT I WAS NEVER AT THAT SPOT BEFORE UNTIL THAT DAY AND THEREFORE COULDNT OF PREVIOUSLY STASHED DRUGS THERE.

FOR IF YOU TAKE THIS WITH THE TESTIMONY OF SCHOLTZ FROM THE DISK STATING STUFF WAS ALREADY THERE WHEN I WALKED UP, THERE CAN BE NO DOUBT THAT I NEVER POSSESSED ANY OF IT.

PLUS SCHOLTZ DID ADMIT ON STAND THAT SHE REVIEWED MY GPS HISTORY AND UNTIL THE DAY SHE WATCHED ME GO THERE, I WAS NEVER THERE BEFORE. IF GPS RECORDS WERE BROUGHT INTO EVIDENCE LIKE THEY SHOULD OF BEEN, IT COULD OF BEEN POINTED OUT TO THE JURY THAT I WAS ONLY IN SPOT 15 TO 20 SECONDS AS REAL TIME GPS WOULD OF SHOWN AND ~~THE~~ CLARIFIED THE REASON MS. SCHOLTZ HAD TO GO BACK THROUGH GPS HISTORY WAS TO SEE IF I WAS EVER THERE BEFORE TO PLACE DRUGS THERE PREVIOUSLY SINCE DRUGS ~~WERE~~ WERE ALREADY AT THE PLACE WHEN I WALKED UP TO IT.

THIS EVIDENCE ALONG WITH THE TESTIMONY OF ~~[illegible]~~ SCHOLTZ FROM THAT DISK WOULD OF CAUSED A DIFFERENT OUTCOME FOR ME. MY LAWYER KNEW THIS AND IN WITH MORE THAN 3 MONTHS FAILED TO OBTAIN IT. HE ALLOWED SCHOLTZ TO IGNORE HIM AND NOT PROVIDE EVIDENCE WE NEEDED TO GIVE ME MY BEST DEFENCE POSSIBLE. MR. MUNSON DID NOT GO TO THE JUDGE TO REPORT THAT THE STATE AND THE STATE WITNESSES ARE NOT COROPERATING WITH HIM ON THE MERRITTS OF THE CASE. HE DID NOTHING. THEN WITH EVIDENCE HE DID OBTAIN, HE REFUSED

TO USE. WHY, I DONT KNOW. I ARGUED WITH HIM TO USE IT AND HE STILL WOULDNT.

3.) HE FAILED TO INTERVIEW ANY ONE. MR. MUNSON DIDNT INTERVIEW ONE STATE WITNESS. NOT ONE. HE DIDNT BOTHER TO INTERVIEW ANYONE. HE HAD REALLY NO IDEA WHAT TO EXSPECT FROM THEM AND DIDNT SPEAK TO THEM ABOUT THEIR TESTIMONY UNTIL THEY WERE ON THE STAND AT MY TRIAL.

HE WAS NOT PREPAIRED AND IS IT NOT SAID THAT THE BEST ATTORNEY IS A PREPAIRED ONE. THE ONE BETTER PREPAIRED IS THE ONE WHO USUALLY WINS. MR MUNSON WAS NOT PREPAIRED AT ALL AND JUST DIDNT BOTHER TO PREPAIR HIMSELF IN ANY WAY. ITS HARD TO MAKE A DEFENSE AGAINST TESTIMONY FROM STATE WITNESSES WHEN YOU DIDNT GET STATEMENTS FROM THEM BEFORE THEY TOOK THE STAND. HOW CAN YOU MAKE A DEFENSE WHEN YOU DONT KNOW WHAT TO MAKE IT AGAINST.

4.) HE FAILED TO CALL WITNESSES ON MY BEHALF. I WANTED A STATE WITNESS THAT WAS ACTUALLY WITH ME AT TIME OF ARREST. THE STATE HAD HER DOWN AS A WITNESS BUT DIDNT USE HER. HER TESTIMONY SAID I DIDNT HAVE DRUGS AND NEVER SAW THE STUFF FOUND BY DOC WITH ME. ONCE AGAIN, MR. MUNSON DIDNT ATTEMPT TO CONTACT HER.

FOR MY DEFENSE WE NEEDED A EXSPERT TO VERIFY AND EXPLAIN THE TRUE STREET VALUE OF THE DRUGS I WAS BEING CHARGED WITH. HE FAILED AT THIS ALTHOUGH HE DID MAKE AN ATTEMPT. EVERYONE JUST IGNORED HIS CALLS AND EMAILS. THE ONE PERSON HE GOT TO TAKE THE STAND AS AN ~~EXSERT~~ EXSPERT, DIDNT SHOW UP, ~~THE~~ FOR MR. MUNSON FAILED TO HAVE THIS MAN COURT ORDERED TO ~~COME~~ TESTIFY.

5.) MR. MUNSON WENT THROUGH HALF MY TRIAL BEFORE IT WAS DISCOVERED THAT HE WAS MISSING A BIG PIECE OF THE EVIDENCE THAT THE STATE WAS USING AGAINST ME. HE CLAIMED IN OPEN COURT HE NEVER GOT IT AND THE STATE SAID IT WAS DISCLOSED. MR MUNSON SAID HE WAS NOT PREPAIRED FOR HE HAS NEVER SEEN IT. THIS AGAIN GOES TO HOW UNPREPAIRED THE MAN WAS. HE DIDNT EVEN HAVE ALL THE EVIDENCE TO MY CASE AND DIDNT EVEN KNOW IT UNTIL THE MIDDLE OF MY TRIAL. ITS KIND OF TO LATE THEN ISN'T IT.

PLUS HE WAS INEFFECTIVE IN KEEPING OUT EVIDENCE THAT WAS DETERMINED ALREADY THAT COULDNT BE USED. HE ~~DID~~ DIDNT NOTICE AND IF HE DID, HE DIDNT DO ~~THE~~ HIS JOB.

I HAD TO WRITE THE PROSECUTORS OFFICE DIRECTLY TO GET ANY KIND OF RESPONSE FROM THEM FOR THEY WOULD NOT COMMUNICATE WITH MR. MUNSON. MR MUNSON COULD NOT ~~AND~~ OR WOULD NOT GET ANY THING DONE. HE'S ~~[illegible]~~ TOLD ME FLAT OUT HE HATES GOING TO TRIAL. FOR ITS NOT HIS STRONG SUITE.

OF COURSE HE SAID THIS TO ME IN THE MIDDLE OF MY TRIAL. HE IS NOT GOOD AT IT AND THERE FORE DOESNT EVEN TRY. TOLD ME THAT I WOULD ONLY GET FROM HIM WHAT I PAID FOR. HE WAS ASSIGNED TO ME FOR I WAS CONFLICTED OUT BY THE P.D.O. SO I DIDNT PAY HIM NOTHING.

FACT IS, HE WAS ONLY ASSIGNED TO MY CASE TO HANDLE A PLEA BARGAIN WITH THE STATE THAT THE PUBLIC DENFENDERS OFFICE SET UP. P.D.O. COULDNT, IN GOOD FAITH, HANDLE IT THEMSELFS BECAUSE OF A CONFLICT WITH OTHER THE PDO REPRESENTED.

THIS MAN IS SO INEFFECTIVE THAT HE COULDNT EVEN HANDLE A PRE ARRANGED PLEA BARGAIN. A WEEK AFTER HE WAS ASSIGNED, I HAD NO PLEA NO MORE AND COULDNT FIND OUT WHY FOR THE PROSECUTORS IGNORED HIM AND REFUSED TO RESPOND. TO HIS CALLS + EMAILS.

MR. MUNSON FAILED ME AND FAILED AT HIS JOB. HE WAS MORE THAN INEFFECTIVE. HE FLAT OUT JUST DIDNT BOTHER. IF HE WOULD OF AT LEAST READ MY WHOLE DISCOVERY AND DID HIS JOB THE WAY IT SHOULD OF BEEN DONE, I WOULD OF HAD A DIFFERENT OUTCOME AT TRIAL.

THANK YOU FOR YOUR CONSIDERATION

Cornelius Ritchie 10/4/14

CORNELIUS RITCHIE