

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
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DIVISION TWO

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STATE OF WASHINGTON)
)
Respondent,)
)
v.)
ALFRED J. TAISACAN)
(your name))
)
Appellant.)

STATE OF WASHINGTON
BY CMM
CITY

No. 34885-3-II

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, ALFRED TAISACAN, 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

Despite of the officers testimony, seeing me smoking with a "Butane Lighter," when a complete search of my vehicle reviewed no such butane lighter was present. (Which in fact, I was on my cell phone talking to a friend inside Walgreen store, waiting to get a ride home while I'm accused of smoking. When I pulled in reverse beside the unmarked vehicle I did not see the officer. In question reviewed the officers could not have seen me smoking because my windows were tinted. (Cont.)

Additional Ground 2

In Washington State Practice Criminal Law Section 913; Identification of Controlled Substance, State v. Poulson, 45 Wn. App. 706, 726 P.2d 1036 (1986); 12 Ferguson, Wash. State Crim. Prac. & Proc. § 2001 (2nd ed. 1997); Clearly states, "it is suggested that a counsel engage the services of an expert to assist in the understanding the chemical analysis of controlled substances. The services of an expert may be requested at public expense when (Cont.)

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

Date: Oct. 18, 2006

Signature: Alfred Taisacan

Additional Ground I. Continuation.

A simple handling of a paraphernalia that was found in the vehicle is in question that it was "cold, unused and not enough to be tested." In addition I was refused to let my friend to testify and rebut the deliberate lies by the officers testimony.

Additional Ground 2, Continuation.

The defendant demonstrates that the experts' testimony will be necessary to an adequate defense of the charge." In section 914

Examples of examination of forensic chemists; there are fifty-two (52), cross examination questions listed, yet my trial counsel fails to initiate any of these questions.

Lastly, the Pre-sentencing investigation was not done before sentencing. State v.

Anmons, 105 Wn. 2d 175, 182-83, 713 P.2d 719, 718 P.2d 796, cert. denied, 479 U.S. 930 (1986). CrR 7.1 ca) provides that a trial court may, at the (conf.).

Additional Grounds 2. Continuation.

time of, or within 3 days after the finding the court order the risk assessment or pre-sentence investigation.

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.

Sincerely yours,
Aqeed Isaacan