No. 35581-7-II

**THE COURT OF APPEALS OF THE STATE OF WASHINGTON**
**DIVISION TWO**

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STATE OF WASHINGTON,

Respondent,

v.

PAUL PRICE,

Appellant.

---

ON APPEAL FROM THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR PIERCE COUNTY

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APPELLANT STATEMENT OF ADDITIONAL GROUNDS

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PAUL DOUGLAS PRICE Pro se
Clallam Bay Corrections Center
1830 Eagle Crest Way
Clallam Bay, WA.

## A. IDENTITY OF THE MOVING PARTY

COMES NOW the Pro se Appellant, Paul Douglas Price, to humbly and respectfully submit my:

**Pro se Statement of Additional Grounds**

Who Respectfully moves this Court for the relief designed below in Part B of this Statement of Additional Grounds.

I have sought out and received assistance from other prisoners in the preparation and typing og my Statement for Additional Grounds.

My Current address is:

**Paul Douglas Price**
**Clallam Bay Corrections Center**
**1830 Eagle Crest Way**
**Clallam Bay, WA. 98326**

> Pro se pleadings are to be construed liberally and held to a less stringent standard than formal pleadings drafted by lawyers. If the court can reasonably read the pleadings to state a valid claim on which the litigant could prevail, the court should do so despite failure to cite proper Authority, confusion of legal theories, poor syntax and sentence construction, or litigant's unfamilarity with the requirements.

See, Parker v. Como, 58 F.3d 814 (2nd Cir. 1995); Curtis v. Benbenek, 48 F.3d 281 )7th Cir. 1995); Shabazz v. Askin, 14 F.3d 533 (10th Cir. 1994); United States v. Eatinger, 902 F.2d 1383 (9th Cir. 1990); Boag v.

MacDougail, 454 U.S. 364, 102 S.Ct. 700, 70 L.Ed. 551 (1982); Hainess v. Kerner, 404 U.S. 519, 92 S.Ct. 594, 30 L.Ed. 652 (1972).

## B. STATEMENT OF RELIEF SOUGHT

Pursuant to RAP Rule 10.10 and 18.8, Appellant seeks relief by the Washington State Court of Appeals Division II, from his unlawful and unconstitutional conviction.

## C. ASSIGNMENT OF ERROR

1. Mr. Price was deprived of his United States Constitutional Fifth And Fourteenth Amendment's, and Washington State Constitutional Article I § 3, right to Due Process because the videotape evidence didn't support the conviction.

2. Mr. Price was deprived of his United States Constitutional Fifth and Fourteenth Amendment's, and Washington State Constitution Article I § 3, right to Due Process when the State didn't have to prove all the elements of the crime.

3. Mr. Price was deprived of his United States Constitutional Sixth and Fourteenth Amendment's and Washington State Constitution Article I § 22, right to fair and impartial jury. When the jury was unduly prejudiced by multiple viewing of video evidence after

being allowed to control the reply for a period of time and then not being allowed to control the reply.

## D. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

1. The United States Constitutional Fifth and fourteenth Amendment's, and Washington State Constitution Article 1 § 3, guarantees a criminal defendant the right to Due Process in all criminal cases. Which was violated. In a case in which the evidence - primarily a store surveillance video tape - is insufficient to support the conviction of theft of a firearm when it does not show Mr. Price with any firearm in his possession?

2. The United States Constitutional Fifth and Fourteenth Amendment, and Washington State Constitutional Article 1 § 3, guarantees a criminal defendant the right to Due Process in all criminal cases, was violated. In a case in which the State does not have to prove every element of the crime of theft of a firearm or unlawful possession of a firearm?

3. The Unitedd State Constitutional Sixth and Fourteenth Amendment's and Washington State Constitutional Article 1 § 22, guarantees a criminal defendant the right to a fair and impartial jury. In a case in which the jury was prejudiced and unduly influenced by a single piece of video evidence after

viewing the video multiple occasions and being allowed to control the reply of video violated Mr. Price right to a fair and impartial jury?

**E. STATEMENT OF CASE**

The State charged Mr. Price with one count each of theft of a firearm and unlawful possession of a firearm. CP 1-3.

Michael Grabowski, owner of The Marksman Gunshop 11003 Canyon Rd E., of Puyallup, Washington, testified that in the course of a routine inventory on August 17, 2005, store employees noticed a handgun was missing. RP 45, 239. A search of the store revealed the box belonging to the gun but not the gun itself. RP 51-52. The lastknown time at which the gun could be accounted for was on August 14, 2005, when an employee showed it to a prospective purchaser. RP 218.

Michael Grabowski, testified that when he viewed the surveillance video he seen Mr. Price: "Reach over the counter, if this is the counter, moving his hand behind the counter, and then in a second approach, moving forward, taking out a black object, large, which is the location we keep the HKs." see trial transcripts of March 29, 2006, Page 63 lines 7-11.

Police and store employees reviewed store surveillance tapes for August 16, 2005, and saw an individual

enter the store, lean over the counter where the missing gun was supposed to have been displayed, remove an black object "a gun holster, see trial transcript, Mr. John Chambers, opening statement. Which was not transcribed." place it in his waistband, and exit the store. At trial, several store employees identified Mr. Price as the person on the tape. RP 62, 171. The surveillance tape was admitted as an exhibit, EX 3, and played several times for the jury by both parties. RP 85, 285, 356.

On September 2, 2005, Mr. Price entered the store and was immediately recognized by store employees from the video tape. RP 157. Bruce Jackson, a store employee testified he had "extensive" law-enforcement experience as a retired senior homicide detective with the Tacomma Police Department and as the former chief-criminal investigator with the Pierce County Prosecutor's Office. RP 174-75. Mr. Jackson followed Mr. Price from the store, across neighboring parking lots, and untimately to a fast-food restaurant across the street from the store. RP 175-76. Mr. Jackson testified he followed Mr. Price to the restroom of the restaurant, and waited immediately outside the door while Mr. Price was in the restroom. RP 182. According to Mr. Jackson, Mr. Price opened the door and asked "are you following me?" RP 182. Mr. Jackson responded that he was, and that he believed Mr. Price had

stolen a gun. According to Mr. Jackson, Mr. Price responded "I didn't steal anything today." Id. According to Mr. Jackson, he asked "Did you steal a gun within the last couple of weeks? Id. Mr. Jackson testified, that in response, Mr. Price "looked, glanced down and away [sic], and said no, I didn't steal any guns." Id.

Detective Curtis Wright gave a statement that he had seen the surveillance video from the Marksman Gunshop of the August 16th, 2005, incident as probable cause for the arrest of Mr. Price. However at trial Detective Curtis Wright testified that the snippet of video shown at trial didn't see any communication between Mr. Price and Mr. Perra, which he had seen when viewing the video at the Gunshop on August 24, 2005. See Trial transcripts of April 10, 2006, Page 319 lines 8-9.

## F. ARGUMENT

### 1. MR. PRICE WAS DENIED HIS FIFTH AND FOURTEENTH AMENDMENT RIGHTS TO DUE PROCESS.

The best available evidence must be used in a trial, and secondary evidence of a fact is inadmissible under the Rules of Evidence so long as the primary evidence is

available. ER 1002, 1003, 1004; Minor v. United States, 375 F.2d 170, 181 (8th Cir.), cert. denied, 389 U.S. 882 (1967). The best evidence rule usually applies to the terms of a document, but if the occurrence of an event is sought to be proved by documentary evidence, the rule applies. Fed. R. Evid. 1002 advisory committee's note. The rule applies whenever a witness's knowledge is derived solely from the document, rather than personal knowledge of the underlying events. Robert H Aronson, Law of Evidence in Washington 1002, 1003 (3d ed. 1998). Such secondary oral evidence is by definition inferior to the documentary evidence. Andrew Crispo Gallery, Inc. v. Commissioner of Internal Revenue, 16 F.3d 1336, 1344 (2d Cir. 1994). Inferences and presumptions do not enhance the credibility of the secondary evidence. Id. at 1344 n.2. A video tape is a document for the purposes of this rule. ER 1001 (a), (b). The video itself is, therefore, a more reliable, complete, and accurate source of information as to its contents and meaning than anyone's description. State v. Modesky, 15 Wn. App. 198, 201, 547 P.2d 1236, review denied, 87 Wn.2d 1013 (1976). The State offered the video to prove its contents, i.e., theft of a firearm, from Micheal Grabowski, owner of the Marksman Gunshop was stolen on August 16, 2005. It is the best evidence.

Mr. Jackson testified that from viewing the video, he seen Mr. Price lean over the counter take a Gun and place it in his waistband and exit the store. See Trial transcripts of March 30, 2006, Page 170 line 24, through page 171 line 7. This oral evidence is derived from the tape, not personal observation. Generally, a witness should describe what he saw and let the court form its own opinions and Conclusions, because a lay witness's opinion derived from the facts is no better than the court's. Ashly v. Hall, 138 Wn.2d 151, 978 P.2d 1055 (1999); Sears v. Seattle Consol. St. Ry., 6 Wash. 227, 231, 33 P. 389, 33 P. 1081 (1893); 5A Karl B. Tegland, Washington Practice; Evidence law and Practice sec. 282, at 348-49 (3d ed. 1998).

The store surveillance video does not show just what Mr. Price placed in his waistband before exiting the store. In the closing arguments Mr. Prices' Attorney clearly stated that Mr. Price had not stolen a gun out of the store, but instead only stoled a holster and that is the black object that was seen being placed in his waistband. See Mr. John Chambers Opening statement.

Detective Curtis Wright gave testimony that the snippet of vidoe shown at trial didn't show any communication between Mr. Price and Mr. Perra, which he had seen when viewing the video at the Marksman Gunshop

on August 24, 2005. See Trial transcripts of April 10, 2006, Page 319 lines 8-9. So this must not of been the same video that he had seen at the gunshop and used as probable cause to arrest of Mr. Price.

This court does not need to weigh the evidence or Judge the credibility of the witnesses. Nor will they substitute their findings for those of the trial court. State v. Carver, 113 Wn.2d 591, 604-05, 781 P.2d 1308, 789 P.2d 306 (1989); Cowitz v. Miller, 68 Wn.2d 637, 637-38, 414 P.2d 795 (1966). They are not, however, bound by findings based on documentary evidence which is part of the record on appeal. Carlson v. City of Bellevue, 73 Wn.2d 41, 48, 435 P.2d 957 (1968); State ex rel. Pacific Fruit & Produce Co. v. Superior Court, 22 Wn.2d 327, 331-32, 155 P.2d 1005 (1945). That is because this court is in the same position as the trial court in reviewing documentary evidence. State v. Cunningham, 93 Wn.2d 823, 834-35, 613 P.2d 1139 (1980) (court compares audio tape with transcript); State v. Wood, 45 Wn. App. 299, 311, 725 P.2d 435, review denied, 107 Wn.2d 1017 (1986). Here, the trial Judge is in no better position then this court to evaluate what the tape shows. State v. Fischer, 13 Wn. App. 665, 667, 537 P.2d 1074 (court views video tape and makes inferences as to mental and emotional condition), review denied, 86 Wn.2d 1003 (1975).

Judge Morgan, writing for the majority in State v. Karpenski, 94 Wn. App. 80, 971 P.2d 553 (1999), makes the point:

If the reviewing court's information is as good or better then the trial court's, the reviewing court will sometimes be permitted to substitute its own view, without deference to the trial court....

....If the trial Judge's basis was entirely documentary, and the documents appear in the appellate record, the appellate court's information is as good as the trial court's, and the appellate court may substitute its own view of competency without deferring to the trial court's ruling. Id. at 104-05. So the question then becomes, viewing the evidence here in a light most favorable to the State, does the video tape support the elements of theft of a firearm and unlawful possession of a firearm.

Corpus delicti. Every person charged with the commission of a crime is presumed innocent until the contrary is proven by competent evidence beyond a reasonable doubt. RCW 10.58.020. The due process clause protects the accused against conviction except upon proof beyond a reasonable doubt of every fact necessary to constitute the crime with which he or she is charged. In re Winship, 397 U.S. 358, 364, 90 S.Ct. 1068, 25 L.Ed.2d 368 (1970).

The corpus delicti of every offense is made up of two elements: First, the existence of a certain act or result forming the basis of the criminal charge. Second, the existence of criminal agency as the cause of this act or result. State v. Gates, 28 Wash. 689, 695, 69 P. 385 (1902). Only when these factors are established do we inquire as to the identity of the person who committed the criminal act. State v. Meyer, 37 Wn.2d 759, 763, 226 P.2d 204 (1951).

To prove theft, the State must first show that something was stolen. RCW 9A.56.050; .020 (1)(a); .010(7)(a); State v. Scott, 86 Wash. 206, 150 P. 423 (1915).

To convict, the State bears the burden of proving every fact necessary to constitute the crime charged beyond a reasonable doubt. State v. Hundley, 126 Wn.2d 418, 421, 895 P.2d 403 (1995).

To prove the essential elements that a gun was missing and that someone stole it, the State presented a video tape, the testimony of store employees that the video tape shows a theft of a firearm.

To lay a proper foundation for the use of video tapes for testimonial (as opposed to merely demonstrative) purposes, the proponent must show that the video in fact shows what it purports to show; **it must be clear.** State

v. Hewett, 86 Wn.2d 487, 492 n.4, 545 P.2d 1201 (1976) (citing State v. Williams, 49 Wn.2d 354, 360, 301 P.2d (1956)). If it does not show what it purports to show, then the video, and testimony derived from it, are not probative.

Mr. Tim Donlin, testified that the portion of the tape showing the gentleman reaching over the counter, there was no skips. It was a lot clearer in other aspects of it. But as we were rewinding, plying, rewinding, playing, over and over, a skip developed, unfortunately, right at that most inopportune time. See Trial transcripts of April 10, 2006, Page 296 lines 10-15.

The court evidently believed him. But evidence that cannot be reproduced in court is of limited relevance. Proper authentication of recording transcends judicial discretion in the matter of the admissibility of evidence, and implicated the constitutional right of confrontation. "[T]he mission of the Confrontation Clause is to advance a practical concern for the accuracy of the truth-determining process in criminal trials by, assuring that 'the trier of facts [has] a satisfactory basis for evaluating the truth of the prior statement.'" State v. Parris, 98 Wn.2d 140, 146, 654 P.2d 77 91982) (citing California v. Green, 399 U.S. 149, 161, 90 S.Ct. 1930, 26 L.Ed. 489 (1970)).

Circumstantial evidence. An insufficiency of the evidence may arise from a lack of the persuasive force or the inconclusive nature of the evidence. Preston Mill Co. v. department of Labor & Indus., 44 Wn.2d 532, 536, 268 P.2d 1017 (1954). But "circumstantial evidence" does not mean "inconclusive and unpersuasive direct evidence." The trier of fact cannot resort to mere theory or conjecture to choose between equally reasonable inferences from the facts, under only one of which the defendant would be liable. Harrison v. Whitt, 40 Wn.App. 175, 177, 698 P.2d 87, review denied. 104 Wn.2d 1009(1985); Pepper v. J.J. Welcome Constr. Co., 73 Wn.App. 523, 547-48, 871 P.2d 601, review denied, 124 Wn.2d 1029 (1994).

A surveillance video may establish the identity of a suspect or the commission of an obvious crime. State v. Hardy, 76 Wn. App. 188, 191, 884 P.2d 8 (1994). aff'd sub nom. State v. Clark, 129 Wn.2d 211, 916 P.2d 384 (1996). But here the poor quality of the video only show's a black object in Mr. Price hand that cann't be positively identified as the missing gun because of the ships. As detective Tim Donlin testified too.

2. MR. PRICE WAS DENIED HIS FIFTH AND FOURTEENTH AMENDMENT RIGHTS TO DUE PROCESS.

The United States Supreme Court held in Jackson v. Virginia, 443 U.S. 307, 61 L.Ed. 2d 560, 99 S.Ct. 2781 (1979), that to review the proper test is whether there was sufficient evidence to justify a rational trier of facts to find guilty beyond a reasonal doubt. "After Winship [In re Winship, 397 U.S. 358, 25 L.ED. 2d 368, 90 S.Ct. 1068 (1970)] the critical inquiry on review of the sufficency of the evidence to support a criminal conviction must be not simply to determine whether the record evidence could reasonably support a finding of guilty beyond a reasonable doubt." Jackson v. Virginia, supra at 318. This inquiry does not require the reviewing court to determine whether it believes the evidence at trial established guilty beyond a reasonable doubt. "Instead the relevant question is whether, after viewing the evidence in light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt." Jackson v. Virginia, supra at 319. The criterion impinges upon a jury's discretion only to the extent necessary to protect the constitutional standard of reasonable doubt. As pointed out in Jackson at page 320, a lesser standard for determining whether the due process command of Winship has been honored."

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To convict, the State bear the burden of proving every fact necessary to constitute the crime charged beyond a reasonable doubt. State v. Hundley, 126 Wn.2d 418, 421, 895 P.2d 403 (1995).

Accordingly, the appropriate test for determining the suffciency of the evidence of unlawful possession of a firearm is defined in RCW 9.41.040:

RCW 9.41.040(1)(a) states:

9.41.040(1)(a) A person, whether an adult or juvenile, is guilty of the crime of unlawful possession of a firearm in the first degree, if the person owns, has in his or her possession, or has in his or her control any firearm after having previously been convicted or found not guilty by reason of insanity in this state or elsewhere of any serious offense as defined in this chapter.

To prove the essential elements that Mr. Price had unlawfully possessed a firearm the State presented the store surveillance video tape, the testimony of store employees as evidence that Mr. Price had stolen a gun and unlawfully possessed that same gun on August 16, 2005.

To lay a proper foundation for the use of video tapes for testimonial (as opposed to merely demonstrative) purposes, the proponent must show that the video in fact shows what it purports to show; **it must be clear.** State v. Hewett, 86 Wn.2d 487, 492 n.4, 545 P.2d 1201 (1976) (citing State v. Williams, 49 Wn.2d 354, 360, 301 P.@d (1956)). If it does not show what it purports to show, then the video, and testimony derived from it, are not probative.

However the testimony of Detective Tim Donlin, that the portion of the tape showing the gentleman reaching over the counter, there was no skips. It was a lot clearer in other aspects of it. But as we were rewinding, plying, rewinding, plying, over and over, a skip developed, unfortunately, right at that most inopportune time. See Trial Transcripts of April 10, 2006, Page 296 lines 10-15.

A surveillance video may establish the identity of a suspect of the commission of an obvious crime. State v. Hardy, 76 Wn. App. 188, 191, 884 P.2d 8 (1994). aff'd sub

nom. State v. Clark, 129 Wn.2d 211, 916 P.2d 384 (1996). But here the poor quality of the video only show's a black object in Mr. Price hand that cann't be positively identified as the missing gun because of the skips. As detective Time Donlin testified too.

David Galloway testified that the last time that the gun could be accounted for was on August 14, 2005.

Detective Tim Donlin testified that "Normally, there are handguns on the top shelves, and as you go down, other holsters and magazines are located below that. See Trial Transcripts of April 10, 2006, Page 297 lines 11-13.

These testimonies shows that that gun could have been stolen up-to two days earlier, and that the black object seen in Mr. Prices' hand could have been a holster from the counter that he was seen taking a black object from.

3. MR. PRICE WAS DENIED HIS SIXTH AND FOURTEENTH AMENDMENT RIGHT TO FAIR AND IMPARTIAL JURY.

The trial consisted of testimony as well as evidence in the form of a copy of a video tape from the camera's located in the business. The defendant did not object to the use of the video tape as evidence. The jury, after testimony and arguments were completed, had the following

three questions during their deliberation; 1) "We respectfully request use of video player." Both counsel were contacted and all parties agreed to the use of a video player by the jury. During the viewing of the video the jury rendered a second question, 2) "Can we operate the video so that we can discuss what we are seeing while we are watching? If the judicial assistant operates the machine we will not be able to discuss the video in front of her. Thank You." Both counsel were contacted and agree to the court's answer which follows as, "the jury may watch the entire video once (in the courtroom) and take notes. The judicial assistant shall operate the video equipment and remain in the courtroom during the viewing. Please do not speak during the viewing of the video. Deliberation shall resume when you return to the jury room."

In spite of the court's answer, at some point the jury deliberations, prior to the second question, the jury was allowed to control the remote control feature of the video cassette player. Defense counsel John Chambers contacted other counsel, Mr. Mark Lundquist, as well as the evidence rule book, and preliminary research reveled that a jury should not be allowed to control the video machine. Mr. Chambers then ran back to the courtroom and the jury had begun their viewing. He knocked on the door

in an effort to reach the judicial assistant; one of the jurors came to the door but did not answer. However, she did see it was this counsel knocking. He then went to the criminal division courts and called the court's judicial assistant and that particular juries' viewing was terminated.

The third and final question, "Could we watch the video again?" The court answered yes. The fact that the jury had control of the reply of the evidence, coupled with multiple viewing is an irregularity in the legal proceeding which prejudices Mr. Price's right to a fair trial and there are grounds for a new trial.

Criminal Rule 7.5(a) governs the rounds for which a new trial may be granted. The court on motion of a defendant may grant a new trial for any one of the following causes when it affirmatively appears that a substantial right of the defendant was materially affected:

(1) Receipt by the jury of any evidence, paper, document or book not allowed by the court;

(2) Misconduct of the prosecution or jury;

(3) Newly discovered evidence material for the defendant, which the defendant could not have discovered with reasonable diligence and produced at the trial;

(4) Accident or surprise;

(5) Irregularity in the proceedings of the court, jury or prosecution, or any order of court, or abuse of discretion, by which the defendant was prevented from having a fair trial;

(6) Error of law occurring at the trial and objected to at the time by the defendant;

(7) That the verdict or decision is contrary to law and evidence;

(8) That substantial justice has not been done.

Mr. Price will focus on Number 5, Irregularity in the proceedings of the court. The issue surrounds the viewing of the video tape as evidence on multiple occasions, and the jurors controlling the reply. The prejudicial error occurred when the jury was given the remote control to control the viewing of the video.

The jury was at first allowed and then not allowed to proceed through the video by self control. The right to a fair and impartial jury governs not only the information that may be conveyed to a jury, but also the manner in which the information may be delivered. RCWA Const. Art. 1, Section 22.

The jury viewed the video during the testimony of two witness and then viewed the video at least twice more during deliberations. It is seldom proper to reply the

entire video taped testimony of a witness for a deliberating jury. State v. Koonts, 145 Wash. 2d 650, 41 P.3d 475.

The Koontz court held that as a matter of first impression the trial court did not take adequate precautions before allowing apparently a deadlocked jury to view video tapes of trial testimony of defendant, day care provider, and child witness. The error was not harmless and the case was reversed and remanded.

The court further held the unique nature of videotaped testimony required trial courts to apply protections against undue emphasis, that consider both the effect and the manner of the video reply before the videotaped testimony can be replayed for a deliberating jury; trial courts must answer how the replay can be limited to respond to jury's request and the procedures necessary to protect the parties, which may include replay in open court, <u>court control over replay</u>, review by both counsel before presentation to jury, limitation of proportion of testimony to be replayed in relation to total amount of testimony presented, and protections against inclusion of elements extraneous to a witness testimony. Id.

A determination to allow a deliberating of testimony in order to answer a specific jury inquiry against the danger of allowing a witness to testify a second time.

Id.

In the case at Bar, the jury, during deliberations, wanted to control the replay as well as deliberate during the viewing. The court, after review, initially allowed the jury to control the replay and instructed the fury not to discuss the case until after the reviewing and all jurors were present in the deliberation room.

However, contrary to the court policy, the jury was permitted to control the replay for a short period of time. Then counsel, after review, came to the courtroom door and inadvertently was mat by a juror and shortly thereafter the jury was asked to stop the viewing and return to the jury room.

This viewing debacle is an irregularity in the proceeding and as such is grounds for granting a new trial. The defendant is guaranteed by the U.S. Constitution's sixth and fourteenth Amendments, as well as the Washington State Constitution Art. 1. Section 22. The defendant has a right to a fair and impartial jury. State v. Davis, 141 Wash.2d 798 924, 10 P.3d 977 (2000).

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G. **CONCLUSION**

For the reasons set forth above and in Mr. Price's statement for additional grounds, his conviction should be reversed and dismissed and his sentence should also be reversed.

**Respectfully submitted** this 19th day of June, 2007.

Paul D. Price #963711

Paul D. Price # 963711 Pro se.

PROOF OF SERVICE

I certify that I served a copy of this document: **(STATEMENT OF ADDITIONAL GROUNDS)** on all persons listed below:

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**BY U.S. MAIL Postage Prepaid**

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated This 19th day of June, 2007.

Paul Price #963711 A-F-6

Paul Price # 963711 A_F_06
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