

STATE OF WASHINGTON )  
 ) COURT OF APPEALS NO. 39654-8-II  
 Respondent, )  
 vs )  
 PABLO CISNEROS )  
 ) STATEMENT OF ADDITIONAL GROUNDS  
 ) PURSUANT TO RAP 10.10  
 Appellant )

FILED  
 COURT OF APPEALS  
 10 JUN -4 PM 12:07  
 STATE OF WASHINGTON  
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Comes Now, Mr. Pablo Cisneros, and pursuant to RAP 10.10 respectfully submits these additional grounds for the court to review in the appeal under cause number 39654-8-II.

**GROUND ONE. THE SEARCH AND SEIZURE WAS UNLAWFUL AND MIRANDA WAS NEVER WAIVED.**

I assign error to the initial search and seizure claiming it was not lawfully conducted because the Officer, as stated in the opening brief at page 5, was never told that I waived my Miranda rights, in fact, I do not even know what Miranda means in order to knowingly waive such a right. What is a Miranda right?

The officer's also, prior to the translator arriving, never asked me to allow them to search the dwelling I was located at, in fact, the officers just entered and arrested me first without asking me any thing.<sup>1</sup>

Therefore, since I never waived my Miranda warnings, the statements I made are not admissable and it was error to admit them in the CrR 3.5 hearing.

**GROUND TWO. MY RIGHT TO A SPEEDY TRIAL WAS VIOLATED BECAUSE I NEVER SIGNED THAT RIGHT AWAY AGREEING TO ANY CONTINUANCES.**

The speedy trial rule was breached by the State's failure to bring me to trial within 60 days as required by law. I never once signed any continuance which was presented to me and insisted that one never be entered. I did not, on my free will, voluntarily waive that right and therefore the case must be addressed as to the merits of this claim and dismissed with prejudice.

**GROUND THREE. THE CONFIDENTIAL INFORMANT IN THE CASE HAD A VESTED INTEREST IN CASE AND THEREFORE HIS TESTIMONY WAS TAINTED WITH SELF INTEREST.**

In this case, as the record establishes, the CI has a clearly vested

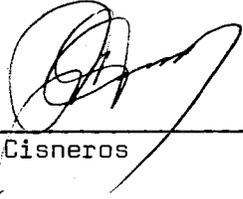
1. This SAG is being drafted by an english litigant who is drafting the SAG due to Mr. Cisneros lack of english capability and I even find it hard to understand his statements made.

interest in the securing the conviction of me. The CI also has a clearly self interest in the case and the statements of the CI are self serving hearsay that is not admissable and it was error for the trial court to admit that evidence.

**GROUND FOUR. THE TRIAL COUNSEL RENDERED INEFFECTIVE ASSISTANCE IN VIOLATION OF MY SIXTH AMENDMENT CONSTITUTIONAL RIGHT.**

The appellant hereby realleges, adopts, and incorporates by reference the entire appellant's opening brief and trial court record. In the case in issue, and as the issues raised show, counsel was defective in violation of my Federal Constitutional right to receive effective assistance of counsel and therefore the conviction should be reversed.

Dated this 18th day of May, 2010.

  
\_\_\_\_\_  
Pablo Cisneros

CERTIFICATE OF SERVICE

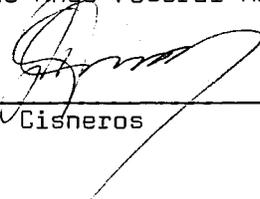
I, Pablo Cisneros, decalre that I caused a true and correct copy to be delivered to the following interested parties of this SAG:

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1. ~~MARK LINDQUIST~~  
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I caused the copy to be deposited into the AHSC Federal Mail system on the 31 day of May, 2010.

  
\_\_\_\_\_  
Pablo Cisneros

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TO: ~~S. [unclear]~~ ~~[unclear]~~  
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