

COURT OF APPEALS
DIVISION II

FILED BY: PH12:57

STATE OF WASHINGTON
BY: 

No. 40447-8-II

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Respondent,

vs.

James Bradford,

Appellant.

Pierce County Superior Court Cause No. 09-1-01944-6

The Honorable Judge Stephanie Arend

Appellant's Supplemental Brief

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A. Mr. Bradford was denied his Sixth and Fourteenth Amendment right to the effective assistance of counsel when his attorney failed to object to improper prosecutorial vouching. Williams Opening Brief, pp. 18-19.4

B. The prosecutor improperly vouched for the victim/witness by questioning him on his plea agreement which included language that he testify truthfully. Williams Opening Brief, pp. 23-24; Williams Reply Brief, pp. 3-4.4

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SUPPLEMENTAL ASSIGNMENTS OF ERROR

1. Mr. Bradford was denied the effective assistance of counsel when his attorney failed to object to improper vouching, as argued in Mr. Williams's Opening Brief.
2. Pursuant to RAP 10.1(g), Mr. Bradford adopts and incorporates Assignment of Error 6 set forth in Mr. Williams's Opening Brief.

SUPPLEMENTAL STATEMENT OF ISSUES

Pursuant to RAP 10.1(g), Mr. Bradford adopts and incorporates Issues 2 and 4 set forth in Mr. Williams's Opening Brief.

SUPPLEMENTAL ARGUMENT

Pursuant to RAP 10.1(g), Mr. Bradford adopts and incorporates the following arguments from Mr. Williams's Opening and Reply Briefs:

- A. Mr. Bradford was denied his Sixth and Fourteenth Amendment right to the effective assistance of counsel when his attorney failed to object to improper prosecutorial vouching. Williams Opening Brief, pp. 18-19.

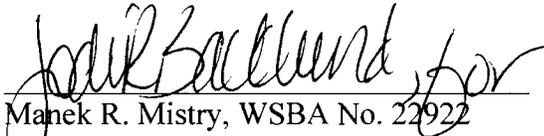
- B. The prosecutor improperly vouched for the victim/witness by questioning him on his plea agreement which included language that he testify truthfully. Williams Opening Brief, pp. 23-24; Williams Reply Brief, pp. 3-4.

Respectfully submitted on March 30, 2011.

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COURT OF APPEALS
DISTRICT II

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STATE OF WASHINGTON
BY _____

CERTIFICATE OF MAILING

I certify that I mailed a copy of Appellant's Supplemental Brief to

James Bradford, DOC #311033
Larch Corrections Center
15314 N.E. Dole Valley Rd.
Yacolt, WA 98675

and to:

Wayne C. Fricke
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and to:

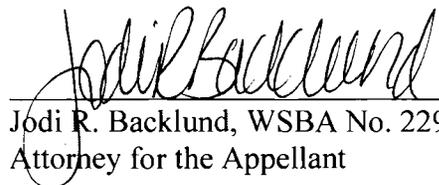
Pierce County Prosecutor
930 Tacoma Avenue, Room 946
Tacoma, WA 98402-2171

And that I sent the original and one copy to the Court of Appeals, Division II, for filing;

All postage prepaid, on March 30, 2011.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

Signed at Olympia, Washington on March 30, 2011.



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