

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
COURT OF APPEALS
DIVISION II
2016 MAY -2 AM 11:20
STATE OF WASHINGTON
BY Cm
DEPUTY

STATE OF WASHINGTON)
)
 Respondent,)
)
 v.)
 Ronald G. Daugherty)
 (your name))
)
 Appellant.)

No. 42573-1-11
STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, Ronald Daugherty, 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

The Court erred when it did not allow the defense to admit evidence of sexually explicit text messages with words like "cum" "hard on" etc. to show precocious knowledge, evidenced by the jury requesting to see the exhibit during deliberations to assess the level of H's precocious knowledge, even after H testified she didn't know what words like precocious, or hard on, meant. The court's decision not to allow this evidence also deprived the defendant of presenting a defence.

Additional Ground 2

The Court erred when it would not allow prior consistent statements by the defendant to others that he had been threatened to rebut motive to lie.

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

Date: 26 April 2016

Signature: Ronald Daugherty

Additional Ground 3

The Court erred by finding that Ambers' new disclosures were admissible.