

COURT OF APPEALS  
DIVISION TWO  
OF THE STATE OF WASHINGTON

FILED  
COURT OF APPEALS  
DIVISION II

2018 MAR 23 PM 3:31

STATE OF WASHINGTON

No. 50415-4-II

DEPUTY

STATEMENT OF ADDITIONAL  
GROUNDS FOR REVIEW

STATE OF WASHINGTON )

Respondent, )

v. )

GROTT, ROBERT )

(your name) )

Appellant. )

I, Robert GROTT, 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

Prosecutor misconduct. In this case the prosecutor put witnesses on the stand knowing that they were going to lie, or had told multiple stories. Petra Smith was not only the deceased friend but also threatened by his "people". Her testimony should not have been admissible. See also Giglio claim. See also Ford v. Hall 546 F.3d 1326, 1332 (11th Cir. 2008) accord Guzman 463 F.3d at 1348

Additional Ground 2

States destruction of Real Evidence. In this case Det. Brian Vold (pg 1426) stated "I removed the magazine. I did not use the magazine for the test fire in case we wanted to process it. But due to contamination issues, I cleaned the exterior off with Bleach." See State v. Campbell, 103 Wn.2d 1, 21 691 P.2d 929, 941. My argument is that he (the deceased) had this firearm in his possession before I fired. I can not prove this without his fingerprints on it. No fingerprint because state destroyed the evidence.

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

Date: 3-17-18

Signature: [Signature]