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Court of Appeals  
Division II  
State of Washington  
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IN THE COURT OF APPEALS FOR THE STATE OF WASHINGTON  
DIVISION TWO

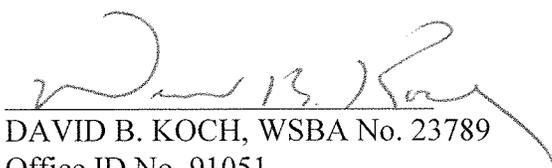
STATE OF WASHINGTON,	)	
	)	
Plaintiff,	)	No. 51256-4-II
	)	
vs.	)	
	)	STATEMENT OF
JOSHUA WILLS,	)	ADDITIONAL GROUNDS
	)	FOR REVIEW
Defendant.	)	
_____	)	

Attached is Mr. Wills' Statement of Additional Grounds for Review.

DATED this 11<sup>th</sup> day of January 2019.

Respectfully submitted,

NIELSEN, BROMAN & KOCH

  
DAVID B. KOCH, WSBA No. 23789  
Office ID No. 91051  
Attorneys for Appellant

# Court of Appeals (SAG)

## State v. Wills, No. 51756-4-II

To whom it may concern:

First off I would like to notify the court that the system as a whole needs to be humbled, from the streets to the highest court. The system was meant to serve and protect the innocent, but as it stands now it's only interest is a prosecutorial win. With this mind set it breeds evil and corruption in the core of the system, which means the system is hurting the general population with Malice. Before I point out issues with this case and your official Records that are incorrect and incomplete, I need you to read real Doctrin.

### Proverbs 6:16-6:23 "CJB" Complete Jewish Bible

6:16 There are six things ADONAI hates, seven which he detests:

6:17 A haughty look, a lying tongue, hands that shed innocent blood,

- 5:18 A heart that plots wicked schemes,  
feet swift in running to do evil,
- 5:19 A false witness who lies with every breath,  
and him who sows strife among brothers,
- 5:20 My son, obey your father's command,  
and don't abandon your mother's teaching.
- 5:21 Bind them always on your heart,  
tie them around your neck.
- 5:22 When you walk, they will lead you;  
when you lie down, they will watch over you;  
and when you wake up, they will talk with you.
- 6:23 For the mitzvah is a lamp, torah is a  
light, and reproofs that discipline  
are the way to life.

Luke 6:37 - 6:38 "CJB"  
Complete Jewish Bible

- 6:37 "Don't Judge, and you won't be Judged  
Don't condemn, and you won't be condemned  
Forgive, and you will be forgiven.
- 6:38 Give, and you will receive gifts—  
the full measure, compacted, shaken  
together and overflowing, will be put  
right in your lap. For the measure  
with which you measure out will  
be used to measure back to you!"

Matthew 15:8 - 15:9 "CJB"  
Complete Jewish Bible

5:8 These people honor me with their lips, but their hearts are far away from me.

5:9 Their worship of me is useless, because they teach man-made rules as if they were doctrines.

Now for the pre-trial on November 1<sup>st</sup>, 2017 with Judge Sully F. Olsen

First off I'm going to point out an error obvious to someone that was present at this hearing, but veiled to someone reading the official record. Page 19 line 10 it states that prosecuting Attorney Keith Hines is doing the questioning when in reality it was Greg Memovich. Now with that being said; an error so simple, yet so major how can anyone trust that the rest of the official record is correct? The answer is, they can't.

Next on the list, Judicial Misconduct. On page 17 line 10-17 and page 23 line 7 through page 24 line 9. This part of the verbatim shows Judicial Misconduct by Sally F. Olsen who is a former prosecutor which display bias in the intrinsic properties of her rulings. The verbatim of these pages read as shown.

Page 17:

line 10

By Mr. Memorich:

line 11

Q. There's two videos, one from looking out of the car and one looking in the car, right?

line 12

line 13

A. Yes

line 14

Q. Right. Two cameras?

line 15

A. Yes, sir.

line 16

Mr. Memorich: can you see it, Your Honor?

line 17

The Court: I can.

Page 23:

line 7

Q. Okay, so it was the refusal to take the field sobriety

line 8

tests?

line 9

A. No. Once he got out of the

car and I saw he was  
line 10 unsteady on his feet. He was  
definitely -- when we're  
line 11 speaking there, he was slurred.  
And that's when I  
line 12 believed I had -- I had the  
probable cause to arrest  
line 13 him.

line 14 Q. Where is he unsteady on his feet?

line 15 A. If you are there in person, you  
can see it. It is not  
line 16 easy to see on video. This is  
not the best quality

line 17 video

line 18 Q. You can't see it on the video?  
Can you see it at all?

line 19 The Court: Stop, everybody. Turn the  
video

line 20 off.

line 21 We need to back it up for  
a minute.

line 22 Reminder, this is very difficult for  
the court

line 23 reporter, so we're going to have to  
have some protocol.

line 24 You can't talk at the same time  
the video is

line 25 playing. So why don't you back

it up a little bit, Play  
Page 24:

line 1 a piece, stop it, and then ask  
questions of the officer.

line 2 Mr. Hines: That's the point I  
was going to  
line 3 make.

line 4 Mr. Memorich: Okay. I didn't  
know. All  
line 5 right

line 6 The Witness: Also --

line 7 The Court: You are not answering  
a question

line 8 Yet.

line 9 The Witness: Yes, ma'am.

Also during the Pre-trial  
Sally F. Olsen coached Trooper  
Nikolaus F. Lull through Questioning  
so she could influence this case  
to benefit the state.

see page 38, 39, 43, 44, 45, 46, 48,  
52, and on page 59 it shows  
that there is only one witness.

On page 51 and 52 Trooper  
Nikolaus F. Lull admits to  
signing Documentation under

oath that he knew was false and it was under penalty of perjury. This documentation and the video were removed by Sally F. Olsen from evidence to increase Trooper Nickolaus F. Lull's credibility in front of the Jury.

Also another thing that happened during a prior time with this case, the prosecuting attorney held a secret court hearing behind closed doors. My lawyer Greg Memorich and I had no knowledge of this hearing until after a warrant was put out for my arrest and an additional \$2500 was to be forfeited for bail set by Sally F. Olsen.

On November 7<sup>th</sup> and 8<sup>th</sup> during Jury Voir Dire, Mr. Hines asks the Jury several questions regarding credibility. At one particular time Mr. Hines asks Jurer #43 if he knows

Trooper Nickolaus F. Lull. Jurer #43 says he does "yes" that he works with him. Mr. Hines also has Jurer #43 explain the training officers get, and at one point and time he even has Jurer #43 vouch for Trooper Nickolaus F. Lull's credibility. I have searched high and low for this last statement in the voir Dire but was unable to find it. If it is not in the documentation then this is an incomplete document and as God as my witness I have other falsified documents by the Kitsap county court.

Last, all this occurred because I did the right thing. I pulled over and took a nap so I wouldn't fall asleep at the wheel and hurt someone.

Sincerely,  
Joshua Wills  
Josh Wills

**NIELSEN, BROMAN & KOCH P.L.L.C.**

**January 11, 2019 - 1:10 PM**

**Transmittal Information**

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**Appellate Court Case Number:** 51256-4  
**Appellate Court Case Title:** State of Washington, Respondent v. Joshua W. Wills, Appellant  
**Superior Court Case Number:** 17-1-01300-3

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