

IN THE COURT OF APPEALS  
STATE OF WASHINGTON DIVISION II

STATE OF WASHINGTON, ) Case No.: 52224-1  
Plaintiff, ) APPELLANTS REPLY  
vs. )  
WILLIAM H. THOMPSON )  
Defendant )

MOTION

COMES NOW APPELLANT William H. Thompson humbly filing his reply to the brief of respondent.  
Declaring that an issue of a Constitutional magnitude does exist.  
Appellant humbly invokes the [R]ule of Lenity as appellants assigned counsel has refused to  
respond to the respondents brief citing it is not his job to respond to the consolidated cases in this  
matter.

ISSUES OF FACT and ARGUMENT IN SUPPORT:

1  
2 1. Appellant Objects to the Respondents failure to answer in a timely manner as ordered by the  
3 Supreme Court of the State of Washington, thus respondents have violated the "Rule of Stare  
4 Decisis", when it did not answer until September 16, 2019, and received by the appellant on  
5 September 20, 2019--thirty days after the Supreme Court deadline was issued, a deadline of August  
6 20, 2019,.

7  
8 The additionally failed to properly request an extension of time from this Honorable Court, and  
9 violated the rule of law, and as such the respondents brief should be stricken and dismissed  
10 because if the shoe were on the other foot and the appellant had done the same this Honorable  
11 would surely have held the appellants feet to the fires of justice for doing the same.  
12

13  
14 2. The brief of the respondents have failed to address appellants PRP concerning the factual law  
15 and its application in the instant matter where, the recorded conversation did not revealed an "act of  
16 crime being committed nor propagated in any form," (RCW 9.73.090(3)(B). In fact the appellant was  
17 heard stating during the entire conversation when "MTT continuously attempted to entrap the  
18 appellant by alluding to her having to speak to someone and report what was happening." Received  
19 the only, proper response of any concerned parent : "by all means do what you must do to get help".  
20 Yet when MTT again at the behest and coaching of Detective Menge, stated: "If I talk to someone  
21 you may be in trouble" in which the appellant immediate replied : " What are you talking about?".  
22

23  
24 During this entire recording there were no implications or insinuations or interpretations made that a  
25 "criminal act" as required by RCW 9.73.090(3)(b),RCW 9.73.050 ---was occurring or had occurred,  
26 or would occur in the future, and without such, the use of the recording was and is prohibited by the  
27 Laws of the State of Washington and such use is a constitutional violation of the appellants right to  
28

1 due process pursuant to the Washington State Constitution 14th amendment, and the U.S.  
2 Constitution 5th amendment..

3  
4  
5 RCW 9.73.090(3)(b):

6  
7 "The details as to the particular offense that has  
8 been, is being, or is about to be committed"

9  
10  
11 RCW 9.73.050: "If it is determine that the defendant did not admit to a  
12 crime the intercepted communication [S]hall be  
13 [I]admissible". as purported by the laws of the State  
14 of Washington.

15  
16  
17 The respondents have conceded that this case does not have any evidentiary proofs i.e. (No DNA or  
18 corroborating testimonies), and that this case was based on hearsay of the alleged victim whom had  
19 changed her version multiple times during trial, therefore the only way to present this case was by  
20 using the intercepted communication authorized by Hon. Judge Hull, knowing that said intercepted  
21 communication do not meet the requirements of RCW 9.73.090(3)(b), and RCW 9.73.050 and was  
22 inadmissible at the onset.

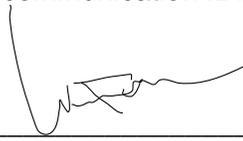
23  
24  
25 The respondents claim fails as it is without merit, and thus their request does not meet the  
26 requirements of the law...Additionally, the respondents are afforded one bite of the proverbial apple  
27 when answering the appellants petition in which the respondents failed to answer the petition in its  
28

1 entirety and as such the "unanswered" claims made by the appellant can only be perceived as a  
2 "[C]oncession to the claim" warranting a evidentiary hearing, or a new trial in the above matter.

3  
4  
5 **Relief Requested:**

6  
7 Petitioner seeks an evidentiary hearing ordered by the authority of this -Honorable Court, based on  
8 the inadmissibility of the intercepted communication ID.

9  
10  
11 Dated: September 25, 2019. X \_\_\_\_\_



12 William H. Thompson

**WILLIAM THOMPSON DOC 735089**

**September 25, 2019 - 7:32 PM**

**Transmittal Information**

**Filed with Court:** Court of Appeals Division II  
**Appellate Court Case Number:** 52224-1  
**Appellate Court Case Title:** State of Washington, Respondent v. William Howard Thompson, Appellant  
**Superior Court Case Number:** 16-1-00704-8

**The following documents have been uploaded:**

- 522241\_Briefs\_20190925192249D2373848\_4826.pdf  
This File Contains:  
Briefs - Appellants Reply  
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**Comments:**

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