July 17, 19

TO: DEREK M. BYRNE
Court Clerk

REF: WASHINGTON STATE COURT OF APPEALS DIVISION TWO
Court of Appeals, Division II
950 Broadway, Suite # 300
TACOMA, WA. 98402-4454

FROM: DANIEL KEEN, JR.
CASE NO. 52285-3-II

RECEIVED
JUL 24 2019
CLERK OF COURT OF APPEALS DIV II
STATE OF WASHINGTON

Dear Derek M. Byrne,

Thank you for the Acceptance of this Appeal. Thank you for your time, effort, Assistance, And Most of All-Cooperation with this Matter. I do hope the following "Additional Grounds" Are Legible, Understandable And in Agreement with the purposed Request.

Thank you Again-

Sincerely,

Daniel Keen Jr

DANIEL KEEN, JR

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
COURT OF APPEALS
DIVISION II
2019 JUL 24 AM 11:55
STATE OF WASHINGTON
BY AP
DEPUTY

STATE OF WASHINGTON Respondent, v. DANIEL KEEN, JR. (your name) Appellant.	))))))))))	No. 52285-3-II STATEMENT OF ADDITIONAL GROUNDS FOR REVIEW

I, Daniel Keen, Jr., 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

SEE Attached page

Additional Ground 2

SEE Attached page(s)

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

Date: 7/7/2019

Signature: Daniel Keen, Jr.

Form 23

Pg. #1

Count of APPEALS DIVISION Two of the State of WASHINGTON

State of WASHINGTON
Respondent,

NO. 52285-3-II

V.

Statement of ADDITIONAL Grounds For Review

Date - Signature - Bottom of last page

DANIEL KEEN, JR.
Appellant

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with Mutiple Justifiable grounds, James Sowder - Clark County Defense Attorney Submitted case to be dismissed numerous times. Each one rejected by the sitting County Judge - belief that - A state sting operation in cooperation with Clark County, LESSEN Serious Consideration for grounds of dismissal of each filing.

Additional Ground #1 -
Violation of "1st AMENDMENT RIGHT OF THE UNITED STATES CONSITUTION" - Freedom of speech or Abridging the right of
(1a.) should Argumentaly been Violated due to freedom of Conversation And Text.
(1b.) It is against the Law for Law enforcement to record any Conversation (ANY) without the prior Knowledge of the person being recorded.

-CONTINUED-

Court of Appeals Division Two of the State of Washington

Continued - (1b)

There is no difference on a cell phone, having a verbal conversation or texting the same conversation. They are both forms of communication on the same devise. So then why is it not required, that Law enforcement are to make aware of the intented filing/Recording/Saving of said conversation. whether it be verbal or texting - same conversation - same devise.

— A King County 2018 case, a Judge was ordered to dismiss (over 100) mutiple prositute cases for failure to reveal Recordings of Conversation on cell phones during/under Sting Operation. Verbal or texing conversations should follow the same Law.

— 2015 Washington State passed a Law that states, Law enforcement Agencies - must obtain a warrent to use a stingray device (Reference Tacoma - pierce County case). A Stingray devise is used to determined a Target cell phone's Location by Spoofing a real cellphone tower with a Strong Signal, forcing All Cellphones in that area to Connect to it. Users then make Calls and Send data as usual, never knowing that Law Enforcement is watching Everything they do. Does this apply to my case in reference to the 3-day conversation with the Law Enforcement agencies?

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Addition Ground # 2 -

Violation of "5th Amendment Right of the United State" Consitution" - No person shall be head to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a grand Jury.

- My charges were never presented to or served by a grand Jury Indictment.

Additional Ground # 3 -

Violation of "14th Amendment Right of the United State's Consitution - " All person Born or Naturalized in the United States, and Subject to the Jurisdiction thereof, are citizens of the United states and of the state wherin they reside. No State shall make or Enforce any Law which shall Abridge the or Immunities of citizens of the States; nor shall any state deprive any person of life, Liberty, or property without due process of Law, nor deny to any person within its Jurisdiction the equal protection of the Laws.

- By Washington State not utilizing my 5th Amendment Right to use a Grand Jury for Indictment of my charges - No state shall make Laws or Enforce Any Laws which shall Abridge my privileges or Immunities without due process of Law - etc.

- Continued -

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Continued Ground #3 -

The "14th Amendment" enforces and upholds proceedings of my "5th Amendment" - "5th" and 14th Amendment violated. I question violation of my "1st Amendment" violated referencing speech, press, recording and text. Again if laws were passed for illegal or legal sting proceedings operation, the 14th Amendment and the 5th have been violated.

Additional Ground #4

Violation of "8th Amendment Right of the United State's Consitution" - Nor cruel and unusual punishment inflicted. No crime scene - No victum! No victum and still sentenced "76.5 months" and "Life on Patrol" - "Life under the Sentence Review Board (SRB)" with no victum. Ground for outrageous conduct, dismissal or reduction of sentence.

(4a) Upon Jury's guilty verdict, they are to decide on punishment. I never heard or saw documentation, where the Jury pronounced or agreed to the "Sentencing Review Board (SRB)" and/or "Life on Parole" under the "SRB" control.

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Additional Ground #5, "CraigList Website - PERSONALS"

(1) Among the Court trial documents is a "CraigList's Rules and Regulations" page. THERE ARE FOUR AREAS in which THE WASHINGTON State patrol (WSP AND the VANCOUVER, WASH - Clark County SHERRIF Department violated. ONE Specifically states "Sting operations" are prohibited, one About fishing & baiting.

DIRECT Violation of CraigList's Rules And the Agreement page upon opening the WEBSITE Classification - To proceed into the WEBSITE. If the WSP' passed Laws to by-pass CraigList's LAW, this is Violation of My 5th & 14th Amendment Right.

(2) "CraigList PERSONAL CLASSIFIEDS" is an "Adult only website", 18 years of age or older - No Minors Allowed. Upon opening the website, there is A "Must be 18 or older Verification PAGE", you ARE REQUIRED to read. If you Are of the 18 years or older, there is A button At the bottom of said page. By clicking on this button you have Agreed And Verified you Are of minimum Age Required to Move forward into the "Adult PERSONAL CLASSIFIED Ads."

(2a). Upon placing A Classified Ad, you ARE REQUIRED And must Complete AN PERSONAL Information profile. THIS will not Allow one to place AN Add, Unless Completed. REQUIRED

- Continued -

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Continued Ground #5, craigList

Information - "NAME, Address, Cell PHONE Number, E-mail And Birthdate - Year/Month/DAY." If one does not complete the birthdate completly And if it does not calulate 18 years of Age, then it will not Allow you to continue And will not post your Advertisement/Classified.

- THIS SHOWS the "WASHINGTON State patrol" (WSP) open Craigslist As An Adult And placed the Classified As An Adult. Posing/Factitiously/pretending to be a minor. Since "WSP" HAS been utilizing Craigslist for their sting operation. "Craig-List" HAS CHANGED their opening "AGE VERIFICATION" Screen page. Now A Credit Card Verification/Requirement for 18 years And older verification.

B. Among the court trial documents, Among the printed text conversation - I texted the question - QUOTE - "ARE you Law Enforcement or HAVE Anything to do with ANY LAW Enforcement Agency?" public word is - That A LAW Enforcement Agent of Any Agency who is working/posing Under-cover. If And when Asked directly, "If they ARE LAW Enforcement or deal with Such Agencies?", They ARE required to Answer truthfully. Is there Such A LAW of Requirement or one not requiring

- continued -

Addition Ground #5 Continued - CraigList

to reveal their true Law Enforcement idenity? on stand during trial, My Defense Attorney, Asked the 'WSP' if they were required to reveal their true idenity while working Undercover by Law. Specially, A working undercover Law Enforcement agent on An 18 and older - Adult only website, factiticusly posing as A minor. The 'WSP' officer Answered - NO. WHAT LAW Allows THis?

Addition Ground #6

'WASH State patrol officer', acting as an Adult posing as A factitious Minor on An Adult only - 18 years Minimum of Age in "Classified Section" of "CraigList". WAS brought to trial + put on stand. This "WSP" officer on Camera, answered the residence Entrance upon Meeting Location. on stand admitted to protraying A Made-up Minor, on stand admitted opening the door As A 6 foot, 26 year male. Theretor, presenting himself as the Adult male Encounter As Expected. No Minor Answered the door At Agree Location, or was A Minor present - Just and only the 26 year male Washington State patrol officer.

-Continued-

Addition Ground #6 Continued

(6a) A well known prostitution sting operation case with similarities, involving a Lacross team. Where all members were accuse of rape, by meeting with an undercover prostitute and found not guilty or the case was dismissed - Duke 7 (seven)?

(6b) Currently, there is a case that went to trial - Lost, with an appeal pending. Charges same as mine. Grays Harbor County, Scott (Last name?), Coyote Ridge Correction Center.

(6c) Related possible similar Washington State cases. Washington State patrol stated, they perform this sting operation in Washington State each year in a different County.

Benton County 2018 - 19 cases
Clark County 2017 - 23 cases
Grays Harbor County 2016 - ? cases
King County - ?
Tacoma County - ?

- The majority charge identicaly and threated with a maximum sentence. Majority pleaded scared with a reduced charge and/or lesser sentence.

-END-