FILED
COURT OF APPEALS

Courts of Appeals
Division Two
of the State of Washington

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AP

State of Washington Respondent. V. Michael Williams Appellant.	NO. 53518-1-II STATEMENT of Additional Grounds for Review

P/M: 4/10/20

I Michael Williams have received 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 Grounds (1)

Counsel failed to argue that the witness made multiple prior inconsistent statements to the incident.

Additional Grounds (2)

Counsel was unprepared for trial and failed to advance a defense authorized by statute where there is evidence to support the defense.

Additional Grounds (3)

Counsel failed to adequately cross-examine the states expert witness on his opinion. The states DNA expert testified that transferable had occurred, but did not disclose any underlying facts or data to his opinion* (Mr. Pulliam testified under oath that Prior to the alleged rape, that I was in the kitchen clean-up. When asked to explain by the state, Mr. Pulliam explained I was in the kitchen washing the dirty dishes.) Counsel never asked for any underlying facts or supporting data from the expert on his opinion to transferable DNA.

Additional Grounds (4)

Counsel failed to introduce certain ex-culpatory evidence. (My attorney had both receipts from the Office Grill and Domino Pizza. Each receipts showing the time of the purchases and most-important what was purchased.) Also I continued to stress to my Attorney the need to call my witness-es, but He just failed to get in contact with anyone.

Additional Grounds (5)

I resided three city block from Tacoma General Hospital, My address was (414 Tacoma Ave So. Tacoma, WA 98402). Mr. Pulliam never chose to go to the Hospital and make these alleged claims that evening, but instead waited 25 hours to go to a Hospital 45 miles away. This only occured after I fought with Mr. Pulliam's father that afternoon around 4:30 pm at my apartment, over my decision to throw Mr. Pulliam's belongings out to the trash, and wanting me to pay for them.