

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,)	No. 78355-1
Respondent,)	
)	STATEMENT OF
v.)	ADDITIONAL
)	AUTHORITY
GORDON BERGSTROM,)	(RAP 10.8)
Petitioner.)	

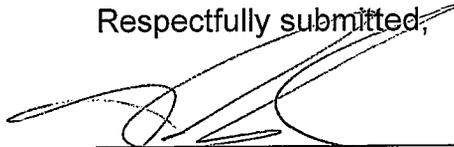
Pursuant to RAP 10.8, petitioner, Gordon Bergstrom
submits the following statement of additional authorities for the
consideration of the Court in the above-captioned matter:

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STATE OF WASHINGTON
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State v. Frank C. Mendoza, __ Wn.App. __, __ P.3d __, Slip op.
at 9, 13 (July 17, 2007) (ruling "We find no authority in CrR 7.1,
or elsewhere, stating that a document generated by a prosecutor
containing a list of a defendant's previous convictions may be
used to prove criminal history . . . our Supreme Court has
already answered this question by holding that 'a prosecutor's
assertions are neither fact nor evidence, but merely argument.'
Ford, 137 Wn.2d at 483 n.3").

DATED this 18th day of July 2007.

Respectfully submitted,



JASON B. SAUNDERS (24963)
Attorney for Petitioner

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,)	
Respondent,)	SUPREME COURT NO. 78355-1
v.)	COURT OF APPEALS NO.55374-7
GORDON BERGSTROM,)	
Petitioner.)	

DECLARATION OF SERVICE

I, ANN JOYCE, DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOLLOWING IS TRUE AND CORRECT:

1. THAT ON THE 18th DAY OF JULY, 2007, A COPY OF A *STATEMENT OF ADDITIONAL AUTHORITY* WAS SERVED ON THE PARTIES DESIGNATED BELOW BY DEPOSITING SAID DOCUMENT IN THE UNITED STATES MAIL.

KING COUNTY PROSECUTING ATTORNEY
W554 KING COUNTY COURTHOUSE
516 THIRD AVE.
SEATTLE, WA 98104

SIGNED IN SEATTLE, WASHINGTON, THIS 18TH DAY OF JULY, 2007

x Ann Joyce