

RECEIVED  
SUPREME COURT  
STATE OF WASHINGTON  
2009 SEP 11 AM 8:11  
BY RONALD R. CARPENTER  
CLERK

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,	)	NO. 82558-I
	)	
Respondent,	)	
	)	STATEMENT OF
v.	)	ADDITIONAL
	)	AUTHORITY
ISIAH HALL,	)	
	)	
Petitioner.	)	
_____		

Pursuant to RAP 10.8, appellant cites to the following case regarding the witness tampering statute.

State v. Thomas, \_\_ Wn. App. \_\_, \_\_ P.3d (2009), WL 2596118 (Wash. App. Div. 2) Slip op. at 5 (Van Deren, C.J., dissenting) (relying on this Court's analysis in State v. Leyda<sup>[1]</sup> to find "RCW 9A.72.120(1) [witness tampering statute] may likewise be interpreted as proscribing a course of conduct aimed at attempting to induce a witness to change his or her testimony").

<sup>1</sup> State v. Leyda, 157 Wn.2d 335, 138 P.3d 610 (2006).

Dated this 8<sup>th</sup> day of September, 2009.

Respectfully submitted,

NIELSEN, BROMAN & KOCH

A handwritten signature in cursive script that reads "Dana M. Lind". The signature is written in black ink and is positioned above a horizontal line.

DANA M. LIND, WSBA 28239

Office ID No. 91051

Attorneys for Appellant

ERIC J. NIELSEN  
ERIC BROMAN  
DAVID B. KOCH  
CHRISTOPHER H. GIBSON

OFFICE MANAGER  
JOHN SLOANE

LAW OFFICES OF  
**NIELSEN, BROMAN & KOCH, P.L.L.C.**

1908 E MADISON ST.  
SEATTLE, WASHINGTON 98122  
Voice (206) 623-2373 · Fax (206) 623-2488

WWW.NWATTORNEY.NET

LEGAL ASSISTANT  
JAMILAH BAKER

DANA M. LIND  
JENNIFER M. WINKLER  
ANDREW P. ZINNER  
CASEY GRANNIS  
JENNIFER J. SWEIGERT

OF COUNSEL  
K. CAROLYN RAMAMURTI  
JARED B. STEED

---

State V. Isiah Hall

No. 82558-1

Certificate of Service by Mail

On September 9, 2009, I deposited in the mails of the United States of America,  
A properly stamped and addressed envelope directed to:

Dennis McCurdy  
King County Prosecutor's Office  
516 3rd Ave Ste W554  
Seattle WA 98104-2362

Isiah Hall 309022  
Coyote Ridge Corrections Center  
P.O box 769  
Connell, WA 99326

Containing a copy of the statement of additional authority, re Isiah Hall  
Cause No. 82558-1-I, in the Court of Appeals, Division I, for the state of Washington.

I certify under penalty of perjury of the laws of the State of Washington that the  
foregoing is true and correct.



John Sloane  
Office Manager  
Nielsen, Broman & Koch  
Done in Seattle, Washington

9-9-09  
Date