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STATE OF WASHINGTON

SUPREME COURT OF THE STATE OF WASHINGTON RECEIVED BY E-MAIL

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|----------------------|---|-------------------------|
| STATE OF WASHINGTON, |) | |
| |) | |
| Respondent, |) | No. 84660-0 |
| |) | |
| vs. |) | |
| |) | STATEMENT OF ADDITIONAL |
| YUSSUF ABDULLE, |) | AUTHORITIES |
| |) | |
| Appellant, |) | |
| |) | |
| |) | |

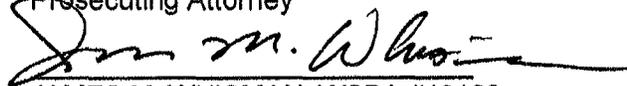
Pursuant to RAP 10.8, the State respectfully cites the following as additional authority on the issue of whether Miranda v. Arizona, requires both officers to testify at a CrR 3.5 hearing:

Howes v. Fields, No. 10-680, 565 U.S. ___ (Feb. 21, 2012) (Where only one of the two interrogating officers testified at the pretrial hearing, and Fields also testified at that pretrial hearing, held that defendant interrogated in prison was not in custody, and that "[f]idelity to the doctrine announced in Miranda requires that it be enforced strictly, but only in those types of situations in which the concerns that powered the decision are implicated. Confessions voluntarily made by prisoners in other situations should not be suppressed. Voluntary confessions are not merely a proper element in law enforcement, they are an unmitigated good, essential to society's compelling interest in finding, convicting, and punishing those who violate the law.")

(internal quotation marks and citations omitted).

Dated this 12th day of March, 2012.

DANIEL T. SATTERBERG
Prosecuting Attorney



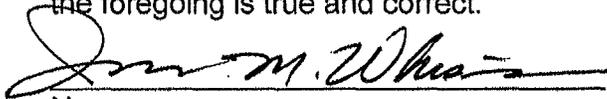
JAMES M. WHISMAN, WSBA #19109
Senior Deputy Prosecuting Attorney
Attorneys for Respondent
W554 King Co. Courthouse
Seattle, WA 98104

ORIGINAL

Certificate of Service by Electronic Mail

Today I directed electronic mail addressed to the attorneys for the petitioner, Eric Broman @ bromane@nwattorney.net, Jared Steed @ steedj@nwattorney.net, and Jennifer Sweigert @ SweigertJ@nwattorney.net, containing a copy of the Statement of Additional Authorities, in STATE V. YUSSUF ABDULLE, Cause No. 84660-0, in the Supreme Court, 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.



Name
Done in Seattle, Washington

3/12/12
Date

OFFICE RECEPTIONIST, CLERK

To: Whisman, Jim
Cc: Pellicciotti, Michael; 'Eric Broman'; steedj@nwattorney.net; SweigertJ@nwattorney.net
Subject: RE: Abdulle, No. 84660-0

Received 3/12/12

Please note that any pleading filed as an attachment to e-mail will be treated as the original. Therefore, if a filing is by e-mail attachment, it is not necessary to mail to the court the original of the document.

From: Whisman, Jim [<mailto:Jim.Whisman@kingcounty.gov>]
Sent: Monday, March 12, 2012 10:56 AM
To: OFFICE RECEPTIONIST, CLERK
Cc: Pellicciotti, Michael; 'Eric Broman'; steedj@nwattorney.net; SweigertJ@nwattorney.net
Subject: Abdulle, No. 84660-0

Dear Supreme Court Clerk,

Attached is a Statement of Additional Authorities in State v. Abdulle, No. 84660-0. Please let me know if there are any difficulties with this filing.

Sincerely,

James Whisman, WSBA No. 19109
Senior Deputy Prosecuting Attorney
King County Courthouse, W554 Third Avenue
Seattle, Washington, 98104
206-296-9660