

CERTIFICATE OF SERVICE

I certify that I mailed

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to Janice Hesler, App Counsel
& Kathleen Proctor, Pres. Atty.

Date 1/31/10 Signed [Signature]

COURT OF APPEALS
WASH DC II

10 JUN 18 AM 11:53

STATE OF WASHINGTON
BY [Signature]
DEPUTY

**STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW**

STATE OF WASHINGTON

Respondent,

v.

DARA RUEM
(your name)

Appellant

No. 39053-1-II

**STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW**

I, DARA RUEM, 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 Page 1 of 1

Additional Ground 2

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

Date: 01/08/2010

Signature: [Signature]

ADDITIONAL GROUND 1

1. The trial court erred by not suppressing all evidence, defendant was detained when officer ran a warrant check that constitute an unlawful seizure.

The deputies went to the Mckinley address hoping to find Chantha to serve the arrest warrant on him. Deputy Kevin Fries knocked on the door of the trailer and Appealant Dara Ruem answered. Deputy then requested for identification following a search for outstanding warrants.

The Superior Court err when they denied the 3.6 suppression hearing. The court should suppress the evidence seize because the officer unlawful seizure of defendant when deputy requested for identification and going beyond the reasonable scope of the initial contact for additional purpose to run a warrant check without reasonable suspicion violates The Fourth Amendment of the United State Constitution.

For the foregoing reason, Petitioner asks this court to reverse the ruling of the Superior Court for Pierce County.

RESPECTFULLY SUBMITTED THIS 8th day of January, 2010.

By: _____


DARA RUEM DOC# 815987
WASHINGTON STATE PENITENTIARY
1313 North 13th Avenue
Walla Walla, Wa 99362

ADDITIONAL GROUND 1

1. The trial court erred by not suppressing all evidence, defendant was detained when officer ran a warrant check that constitute an unlawful seizure.

The deputies went to the McKinley address hoping to find Chantia to serve the arrest warrant on him. Deputy Kevin Fries knocked on the door of the trailer and Apartment Dora Ruem answered. Deputy then requested for identification following a search for outstanding warrants.

The Superior Court er when they denied the 3.d suppression hearing. The court should suppress the evidence seize because the officer unlawful seizure of defendant when deputy requested for identification and going beyond the reasonable scope of the initial contact for additional purpose to run a warrant check without reasonable suspicion violates The Fourth Amendment of the United State Constitution.

For the foregoing reason, Petitioner asks this court to reverse the ruling of the Superior Court for Pierce County.

RESPECTFULLY SUBMITTED THIS 8th day of January, 2010.

By: _____

DARA RUEM DOC# 812987
WASHINGTON STATE PENITENTIARY
1313 North 13th Avenue
Walla Walla, Wa 99362

DECLARATION

I, DARA RUEM, declare that, on 9th, 2010, I

deposited the foregoing document,
Statement of Additional Grounds for Review

or a copy thereof, in the internal mail system of

WASHINGTON STATE PENITENTIARY
[name of institution]

and made arrangements for postage, addressed to:

Lance M. hester, 1008 South Yakima Ave Suite 302, Tacoma, WA 98405
[name and address of court or other place of filing];

Court of Appeal Division II, 950 Broadway Suite 300, Tacoma, WA 98402
[name and address of parties or attorneys to be served].

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

DATED at WALLA WALLA, WA on 9th, 2010.
[city] [state]

[signature]

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