

part D

87529-4

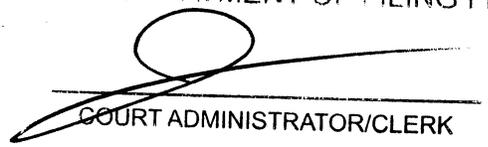
COURT OF APPEALS OF THE STATE OF WASHINGTON

DIVISION 1

7-27-70

PETITIONER MAY FILE PETITION WITHOUT PAYMENT OF FILING FEE

In the Matter of the Application)
For Release from Personal Restraint)
of:)
)
)


COURT ADMINISTRATOR/CLERK

Personal Restraint Petition

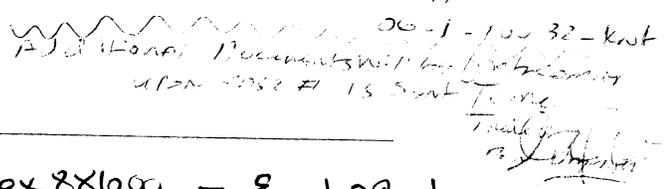
BARON N. HAGHIGHI
Petitioner

-) Pursuant to (RAP 16.3)
-) Presented To Court Due To Use of
-) Inadmissible Evidence Deemed Unconstitutional
-) Under State of Washington Constitution
-) Dec 7 - 2009 - State vs. [unclear]
-) A more change of law
-) - Presentation of new evidence

If there is not enough room on this form, use the back of these pages, or other paper. Fill out all of this form and other papers you are attaching before you sign this form in front of a Notary.

P.R.P. Followup to previous
Court of Appeals case no. 61436-3-1
King County Superior Court case #

A. Status of Petitioner


Additional Documents with [unclear]
upon case # 15 sent to me

I, BARON N. HAGHIGHI #72125

McNeil Island Correctional Ctr. P.O. Box 881000 - E. 109-1
Steila Coon - Washington 98388
(Full name and address)

Apply for relief from confinement. I am am not now in custody serving a sentence upon conviction of a crime. (If not serving a sentence upon conviction of a crime) I am now in custody because of the following type of court order:

Exceptional Sentence 8 yrs + Restitution - No Probation
Due To Use of Inadmissible Evidence In Trial
Police Detachments from Kent went to Another State
with out usage of the law. In violation of their
Being deemed as Unconstitutional by state Supreme
Court.

(Identify type of order)

MARCH 15 4:11:00

1. The Court in which I was sentenced is: King County Superior Court.

2. I was convicted of the crime(s) of: Please Review Attached.

3. I was sentenced after trial , after plea of guilty on _____,
(Date of sentence) (Year)

4. The judge who imposed the sentence was Judge Deon Lam.
(Name of trial court judge)

5. My lawyer at trial court was: Mr Charles S. Hamilton. Attorney at Law

Law Office of Charles S. Hamilton / 1325 4th Avenue / Suite #940
Seattle Washington 98101
(Name and address if known, if none, write "none")

6. I did did not appeal from the decision of the trial court (if the answer is that I
did), I appealed to: Court of Appeals

(Name of court or courts to which appeal was taken)

7. My lawyer on appeal was: Mr Casey Grannis.
(Name and address if known, if none, than write "none")

8. The decision of the appellate court was was not published. If the answer is that
it was published, and I have this information), the decision is published in: _____

(Volume number, Washington Appellate Reports or)

(Washington Reports and page number)

9. Since my conviction I have have not asked a court for some relief from my (attached) sentence other than I have already written above. (If the answer is that I have asked)

The court I asked was: Court of Appeals - Seattle Washington
Division 1 - One Union Square, 600 University Street
Seattle Washington, 98101-4170

(Name of court or courts in which relief was sought)

Relief was denied granted Please Review attached.

Case #

Aug 17 - 2009

(Date of decision, if more than one, dates of all decisions)

10. (If I have answered in question 6 that I have asked for relief), the name of my lawyer

in the proceedings mentioned in question 6 was: Mr Casey Gannis - attached

Nielsen, Brannen, Leck Law Firm - 1908 E. Madison Avenue, Seattle
Washington, 98122

(Name and address if known; if none, write "none")

11. If the answers to the above questions do not really tell about the proceedings and the

court, judges and attorneys involved in your case, tell about it here (Please Review

attached), However, my previous attorney Mr Casey Gannis

As per attached has indicated he is no longer my

attorney. I am not a legal professional, it is therefore

some things, were not done that should have been, as far

as legal proceedings, I have tried to hire attorneys

however, due to the fact that I cannot get my hands

on my assets as they are foreign assets. I seek for the

court to assist me with counsel & I will immediately make

full restitution upon my release.

B. Grounds for Relief

(If I claim more than one reason for relief from confinement, I attach sheets for each reason separately, in the same way as the first one. The attached sheets should be numbered "First Ground," "Second Ground," "Third Ground," Etc.), I claim that I have (number) 2 reason(s) for this court to grant me relief from the conviction described in part A.

Second Ground

(First, Second, etc.)

1. I should be given a new trial or released from confinement because [Here state legal reasons why you think that there was some sort of error made in your case which gives you right to a new trial or release from confinement.]:

State vs Winkstein, struck Down the Inevitable Discovery Exception to the Exclusionary Rule as being Incompatible with the States Constitution.

Previously The Court of Appeals in my case affirmed The Trial Courts denial of my Suppression motion on Inevitable Discovery Grounds, Winkstein is a change of Law That requires the appellate Court to address The merits of my claim To Further the "ends of Justice" It is Therefore I seek Relief with This action At This Time.

Thank you

2. The following facts are important when considering my case [After each fact statement, put the name of the person or persons who know the facts and will support your statement of the fact. If the fact is already in the record of your case, indicate that also.]:

A vast majority of my case was Based on the Inevitable Evidence Ruling & the fact is my Two Previous attorneys, Mr Charles S Hamilton - my Trial attorney & Mr Casey Conners, my appeals Attorney, have sued that & Brought action to This Court denied By The Court of Appeals.

However On August 17th 2009 - The Honorable
Court of appeals struck down my Inevitable
Discovery Issues, As I am sure is now part of
The Record.

3. The following reported court decisions [include citations if possible] in cases similar to mine show the error I believe happened in my case [if none are known, state "None Known"]:

Honorable Judge Dean Lum in my case
Case # _____, Cows are an Exceptional
Sentences, In spite of the fact my Trial Attorney had
Raised this Issue Initial, However, Honorable Judge
Dean Lum maintained this was not a law of matter
of Record. Well now it is a matter of Record at
The State Supreme Court, that Inevitable Evidence
Is Absolutely Unconstitutional. I would appreciate
Equal Treatment under the law, In Search for
Justice, Under the laws of the U.S. Constitution.

4. The following statues and constitutional provisions should be considered by the court [if none are known, state "None Known"]:

NONE KNOWN.

5. This petition is the best way to get the relief I want and no other way will work as well because:

I Have Attempted To Resolve Issue At All Levels
Of State, And the Court of appeals, yet In spite

Of the validity of my claims & facts that are supporting justice has been denied in my case

Statement of Finances

If you cannot afford to pay the filing fee or cannot afford to pay an attorney to help you, fill this out. If you have enough money for these things, do not fill out this part of the form

- 1. I do do not ask the court to file this without making me pay the filing fee because I am so poor I cannot pay the fee.
- 2. I have \$ 10 in my prison or institution account.
- 3. I do do not ask the court to appoint a lawyer for me because I am so poor I cannot afford to pay a lawyer.
- 4. I am am not employed. My salary or wages amount to \$ 0 a month.
My employer is: Due To My Current Incarceration

New Millennium International Enterprises
3117 24th Pl. S.E. Sumner Wash. 98075-9517
(Name and address)

- 5. During the past 12 months I did did not get any money from a business, profession, or other form of self-employment. If I did, it was:

Self Employed
(Kind of self employment)

The total income I got was \$ Please Refer to attached

- 6. During the past 12 months, I:

DID	DID NOT	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Get any rent payment. If so, the total amount I got was \$ _____
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Get any interest. If so,

- The total amount I got was \$ Not white Incorporated
- Get any dividends. If so, the total amount I got was \$ _____
- Get any other money. If so, the amount of money I got was \$ _____

7. During the past 12 months, I:

- DID** **DID NOT**
- Have any cash except as said in answer 2. If so, the amount of cash I have is \$ _____
- Have any savings accounts or checking accounts. If so the amount in all is \$ _____ NOT IN U.S.A.
- Own Stocks, Bonds, or Notes. If so, there total value is \$ _____ NOT IN U.S.A.

8. List all Real Estate and other property and things of value, which belong to you or in which you have an interest. Tell what each item of property is worth and how much you owe on it. Do not list household furniture, furnishings, and clothing which you or your family need.

Item: Not in U.S.A. AS of yet Value: \$ _____

Item: " " Value: \$ _____

Item: " " Value: \$ _____

9. I am am not married. If I am married, my spouses name and address is:

OLGA HOGHISHI

1424 148th ave. S.E. # H2

Belleune Washington 98007

10. All of the persons who need me to support them are listed here:

Name	Address	Age	Relationship
<u>OLGA Hoghishi</u>	<u>1424 148th ave. S.E. # H2 Belleune Wn. 98007</u>	<u>37</u>	<u>W. Fe.</u>
<u>Helen Hoghishi</u>	<u>same</u>		<u>Daughter</u>
<u>Mary Hoghishi</u>	<u>same</u>		<u>Daughter</u>

All the bills I owe are listed here:

Creditor	Address	Amount
N/A		\$ _____
N/A		\$ _____
N/A		\$ _____

C. Request for Relief

I want this court to:

- Vacate my conviction and grant me a new trial. Without the INTRINSIC EVIDENCE ISSUES, Ruled Inconsistent with Washington State Constitution On December 03 - 2010 - IN STATE OF WASHINGTON.
- Vacate my conviction and dismiss the criminal charges against me without a new trial. Due To this ERRONEOUS SENTENCING (EXCEPTIONAL SENTENCE) Under The PREMISE OF INTRINSIC EVIDENCE
- Other ^{or} what ever option the Court sees fit. or To Set me Free at this Time with my 20 years remaining [Specify]: I should not have been given an EXCEPTIONAL Sentence ① - It is UNCONSTITUTIONAL, Ruled by State Supreme Court, as it is, I respect further seek relief from incarceration as this ruling Infract applies to me also under Equal protection Under U.S. Constitution & my Due process rights. If this matter requires an attorney I would appreciate it if the Honorable court could assign me one & I will make full restitution to the Honorable Court, Other wise please Advise me. Thank you

1- Honorable Judges

COURT OF APPEALS
STATE OF WASHINGTON

Date March 13, 2010

2- Honorable Court of Appeals

3- Division - 1

From: Bronson N. Haghighi

4- ONE UNION SQUARE

5- 600 UNIVERSITY STREET,

6- SEATTLE, WASHINGTON 98101-4170

Re: State vs Weinstein
A Major Change in
Law, Derived
Unconstitutionally with State
Constitution
Pec - 03-2009

7-
8- GREETINGS,

9-

10- I, Bronson N. Haghighi; Respectfully Submit This

11- MY P.R.P - PERSONAL Restraint petition, I LEAVE

12- IN your Capable Hands Due To the Following Facts.

13-

14- ① - IN December 2009, the Honorable State Supreme

15- Court in State vs Weinstein, Struck Down The

16- Insultable discovery Exception To Exclusionary Rule

17- AS BEING INcompatible with the Washington -

18- Constitution, this is a major Change of the Law.

19-

20- IN the Archives of the Court of Appeals the

21- Honorable Court of Appeals will find that One of

22- The Several Items leading to the Rejection of

23- my appeal ON August 17, 2009, Based ON

24- The fact that NO Record existed To Proclaim

25- The Unconstitutionality OF Insultable Discovery -

26- Until last year, AS the Result of meeting

- 1- The Same Criteria In my case Due to State vs.
- 2- Winterstein; I respectfully request what the Honorable
- 3- Courts previous position of Affirming the Trial
- 4- Courts motion on Inevitable discovering grounds
- 5- I am requesting that this major change in law now
- 6- Requires the Honorable Court of Appeals to address the
- 7- Merits of my claim, to further "ends of justice", and
- 8- my Equal Coverage Under The laws of the United States
- 9- Constitution, and even so important Due process.

10-

- 11- In order to assist the Honorable Court of Appeals
- 12- Come to proper conclusion based on the facts, not
- 13- Merely on States mixture of viable but mostly
- 14- Unfactual theorizing the facts, most of which
- 15- My former attorneys failed to properly investigate
- 16- Or present to the Honorable Court. I also submit
- 17- And Relays to the attention of your Honors, some
- 18- Newly Released Information, not previously available
- 19- Or never introduced by my attorneys of the past

20-

- 21- In states rebuttal & rejection of my appeal
- 22- And false assertions, & had on no investigation
- 23- Of factual evidence I tried hard to introduce
- 24- Through my previous attorneys. Or to the Honorable
- 25- Superior Court Judge Dean Lum, denied EVERY TIME
- 26- My requests to take various legal issues to court

→

9. 4. 91

Page 500

- 1. Informing me I need to go through my claims to
- 2. Address issues with the Superior Court.

3.

4. (2) - In enclosed documents related to the Stokes Argument

5. On page 17 Exhibit # ⁽¹²⁾ A's attached, it was the Stokes -

6. position that, the Supreme Court had not decided on

7. Inevitable evidence. that argument becomes moot

8.

9. (3) - In the following documents I have submitted facts

10. Account #s at Banks, Bankers confirmations, Identity

11. Theft police reports, check systems documents verify

12. That prior to my arrest on March-04-2006, I had

13. Been working with them, Authorities of the Federal

14. Trade Commission that specifically deals with the

15. Issues of Identity Theft, this report included

16. But was not limited to all state Bank - Item # 5

17. Washington Mutual Bank Item # 3 among other banks

18. On page # 2 "Check Systems Consumer Statement", S.F.T.C.

19. Federal Trade Commission Reports # was issue (1) 700 8647

20. (2) 521-32 (3) 1581066 (4) 581 8294

21. (7) 581 8294 as a follow up (8) 15810661 as a follow up to

22. To reports of Identity theft these reports had been

23. Made on Date of 11-14-05 approximately (4)

24. Four months prior to my arrest, I was waiting for

25. The 'FTC' Federal Trade Commission to fully

26. Investigate the claims by their investigation -

27. None of the outcomes would to investigate my claims -

- 1- On Facts As I presented them as can be witnessed
- 2- By Review of letter from Mr Joseph Alvarez on
- 3- Of my previous attorney's on page# _____ & please also
- 4- Review report written on page# _____ in my motion
- 5- To Honorable Superior Court Judge Robinson via a writ
- 6- Of Habeas Corpus, Court letter & letters from one of
- 7- My family friends Mrs Shannon Allen on page# _____
- 8- That Mr Alvarez was not investigating my case &
- 9- Not acting in my best interest, none of these facts
- 10- Were presented to the Honorable Court of Appeals by
- 11- The state attorney, or Honorable Supreme Court of
- 12- Wash. ~~upon~~, so it is therefore in spite of all the
- 13- Incorrect information, "that I did not have the money"
- 14- Intended to commit crime", knew there were no
- 15- Funds in the accounts etc. are false at best
- 16- Bogus & dishonest at worst, so that concludes.
- 17- That aspect of the issues. my favorite is "that I
- 18- Do not own my corporation as such I submit
- 19- Copies of my licenses not including my 2010 license
- 20- (I could not get copies) will make available upon
- 21- Court request. also upon court request a list of
- 22- Bank accounts, names of some officers, that could
- 23- Will & would have testified on my behalf in court it
- 24- Was not based on the Honorable Superior Court of
- 25- Washington lack of perjury / or willingness to investigate
- 26- My attorney that did not wish to investigate my
- 12 claims to call call my witnesses. led to the current

1- INJUSTICE that is still going on until Today & will
 2- Continue until July 14 2012, please review page #
 3- _____ as it has concluded my release date by
 4- The Department of Corrections I have served 6 years
 5- of Time with my Good Behavior Time 4 years without
 6- Under This "Inevitable Evidence" Issue. I would pray
 7- That the Honorable Court of Appeals Grants my motion
 8- For preferably Immediate Release from Incarceration
 9- However if that is not possible, or within the
 10- Honorable Court of Appeals I need to be sent
 11- Back in front of The Honorable Superior Court
 12- Of King County, if I could obtain D.S.O,
 13- To deal with my addiction Issues once
 14- forced or to be place under mental health
 15- Probation such as in the case of the
 16- Honorable Juvenile Court of Snohomish County
 17- Included in this mailing on page _____
 18- Exhibit # _____, or perhaps by calling
 19- Mr Bill Jesette, whose information is included
 20- On page # _____, exhibit # _____,
 21- About the specific Details of the mental health
 22- Sentencing in which Time I now deal with
 23- My P.T.S.D Issues and a list of Therapists
 24- Is included on page # _____, exhibit # _____,
 25- In a letter from the Sidman Institute, why
 26- Could I not get the same from The Superior Court
 27- Of King County,

700, 911,
Page

- 1- ONE Other Notable Item Of Interest, the state
- 2- Brings up the Issue of my Convictions In Southern
- 3- California, in pages —, —, —, I have been
- 4- Able To Submit Into the Honorable Court of appeals
- 5- That all These Cases are now Closed cases that
- 6- were Satisfactorily Satisfied Upon my Release I
- 7- Will Inc incurring To Expense all These Cases from
- 8- the file & if I can To Seal Them for Good. It
- 9- Has been a long hard Battle for me In my life
- 10- However, With the GRACE of God, I Intend
- 11- To fully Restore my life for God, For society,
- 12- For my ailing Mother for my Beautiful wife
- 13- and Children. And the Honorable Court of appeals
- 14- Has my every Reassurances that I, Brown
- 15- Haghighi, will never Break Any Rules or Laws -
- 16- And I will Seek Advice of professionals & will
- 17- NOT Unknowingly Violate No Rules, Regulations or
- 18- Laws, For all the Individuals that God Had In this
- 19- matter & Case I Sincerely Apologize And someday
- 20- I will make it up to them. As Such I have been
- 21- Able To Complete SEVERAL Department of Corrections
- 22- Programs Such as Prison Management, Victim
- 23- Awareness, Freedom Project etc, will Submit
- 24- Certificates upon the Courts Request.
- 25-
- 26- I apologize for the length of This Submission
- 27- I meant to provide all of the included Information.

Page 90

Page

- 1- And P.R.P Prior To the One year deadline to my
- 2- action. It may have not been done as professionally
- 3- as with an attorney, but it is In fact the best
- 4- I can do with out Counsel.

- 5- Finally, I thank you for your time & consideration
- 6- & your decision prior to knowing what it will be.
- 7-

- 8- May the Lord Bless you & yours; May the Lord
- 9- Shine light up wency & fairness In your thoughts
- 10- and minds.

11-

thank you

12-

Sincerely & respectfully

13-

14-


Brandon N. Bennett

15-

16-

17-

18-

19-

20-

21-

22-

23-

24-

25-

26-

≡ x v, n. [s# 2]

Various State Arguments of Interest in
the Insurable Securities & Business Transactions

1 (1) of (9) pages

Please Review Submission Reqs

Exhibit #17

axiom. No rational juror could conclude anything but that Haghghi wrote bad checks and walked out of the bank with money in his hand. The dispositive issue was his state of mind in so doing.

Courts look to the facts of the individual case to see if the test for ineffective assistance is met. Tilton, 149 Wn.2d at 784. "Not conducting a reasonable investigation is especially egregious when a defense attorney fails to consider potentially exculpatory evidence." Davis, 152 Wn.2d at 721. Defense counsel's failure to investigate and present a diminished capacity defense is egregious here because it deprived the jury from considering the only viable defense to the charges. Dr. Trowbridge, had he been called as an expert witness, could have provided an explanation for Haghghi's behavior that did not amount to criminal behavior and a rational jury could have believed him. Reversal is required because counsel's failure to present a diminished capacity defense undermines confidence in the outcome.

Please Review Exhibit #17 in the Exhib Issue

4. THE COURT WRONGLY DENIED HAGHIGHI'S MOTION TO SUPPRESS AND FURTHER ERRED IN FAILING TO CONDUCT AN EVIDENTIARY HEARING ON THE ISSUE OF INEVITABLE DISCOVERY.

Reversal is required because the State did not prove by a preponderance of the evidence that it would have inevitably discovered Haghghi's bank records absent the improper search.

11 of 10 pages

Part 3 -

Exhibit # ①

Letter from previous attorney indicating
that the Incurable Diseases Issue
is unconstitutional IN the
Washington State Constitution.

Released To

Feb-04-2010

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

LAW OFFICES OF

NIELSEN, BROMAN & KOCH P.L.L.C.

1908 E. MADISON STREET
SEATTLE, WASHINGTON 98122
Voice (206) 623-2373 Fax (206) 623-2488
WWW.NWATTORNEY.NET

Received -
December 24, 2009

Exhibit # 1

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

OFFICE MANAGER
JOHN SLOANE

LEGAL ASSISTANT
JAMILAH BAKER

OF COUNSEL
K. CAROLYN RAMAMURTI
JARED B. STEED

(12) [unclear]

December 22, 2009

Baron Haghighi
No. 7211125
Monroe Correctional Complex
P.O. Box 7001
16700 177th Ave SE
Monroe, WA 98272

Released To:

As per [unclear] copy of this to be
submitted to [unclear] [unclear]
[unclear] [unclear] Dec 29-2009

Re: State v. Haghighi (No. 61436-3-I)

For further proceedings

Dear Mr. Haghighi:

As you know, my representation on your direct appeal is finished and I am no longer your attorney. I write, however, to direct your attention to a recent Washington Supreme Court decision that could have an impact on your case.

Earlier this month, the Supreme Court in State v. Winterstein struck down the inevitable discovery exception to the exclusionary rule as being incompatible with the Washington Constitution. A copy of that decision is included with this letter. This decision is a major change in the law.

The Court of Appeals in your case affirmed the trial court's denial of your suppression motion on inevitable discovery grounds. You did not seek review of the Court of Appeals decision in the Supreme Court. Your direct appeal is over and you cannot directly challenge the Court of Appeals decision.

However, you may be able to raise the suppression issue in a personal restraint petition (PRP), citing Winterstein as a change in the law that requires the appellate court to address the merits of your claim to further the "ends of justice." Remember, the general rule is that you only get to file one PRP. It must generally be filed within one year from the date on which the mandate for your direct appeal issued.

As you know, you do not have the right to assigned counsel for the purpose of filing a PRP. Assuming you have not hired a private attorney, you will need to file the PRP by yourself. The reviewing court will take a look at it and will probably assign counsel to you if it believes the PRP has merit.

(7) - (3) page

I hope you find this information informative.

Sincerely,



Casey Grannis
Attorney at Law

enc.

Court of Appeals
State of Washington Respondent,

v.

BARON N. HACHIGITI
Petitioner.

CAUSE NUMBER G1436-3-7 Amend 1
Kent case # 06-1-100324 Kent

DECLARATION OF MAILING

I, Baron N. Hachigiti, declare that on the 13 day of

March, 2010, I deposited the foregoing (name documents sent below)

All documents set forth to proceed with P.R.P motion to
connect sentencing based on new Supreme Court rules - new
information & evidence not I introduced before by my counsel
or a true copy thereof, in the internal mail system of the MONROE CORRECTIONAL
COMPLEX - WSR-UNIT and made arrangements for postage, addressed to:

Court of Appeals - Clerk
Division # 1
One Union Square / 600 University Street
SEATTLE, Washington 98101-4170

Do not have access to copies
or copies

Do not have access to copies
or copies

Do not have access to copies
or copies

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

Dated this 13th day of March, 2010.

[Signature]
Petitioner, pro se.

Inevitable Issues of Discovery
Evidence
3 takes arguments

A Kent police officer obtained a warrant to search the Haghghi's bank records maintained by Allstate, an Illinois bank where Haghghi opened his accounts. CP 23-28. Haghghi moved to suppress evidence of the bank records seized pursuant to the warrant on the ground that the issuing judge lacked authority to direct a warrant to the out-of-state bank under the Washington Constitution and statute. CP 18-28. In response, the State claimed the warrant was issued with proper authority and complied with all technical requirements. CP 206-228. On October 23, the defense filed its reply, insisting the judge had no authority to order execution of a search warrant on the Illinois bank. CP 71-76. On October 24, the State filed a supplemental brief claiming the evidence would have been inevitably discovered. Supp CP __ (sub no. 94, State's Supplemental Briefing, 10/24/07).

That same day, the court decided the matter without further argument, even though defense counsel had not had time to respond to the State's briefing on the inevitable discovery issue. 3RP 48. The court concluded the warrant was not legally enforceable in Illinois because the State did not "domesticate" the warrant. CP 175 (CL 3(D)). Although the usual remedy would be exclusion of the improperly obtained evidence, the court further ruled the evidence was admissible under the inevitable discovery doctrine because the State proved by a preponderance of the

Exhibit #12
Total 90 pages

evidence that the bank records would have been discovered by the lawful means of a subpoena duces tecum once the case had been filed in the superior court. CP 176-177.

In support of this claim, the court asserted there was "abundant evidence that all of the records provided by Allstate Bank pursuant to the search warrant would have been gathered by the State through an independent source, and that the documents would have been inevitably discovered. This is because, at the time the warrant was sought, the investigation was mature: the defendant's identity was not at issue in any way; police had in their possession documentation that would inevitably lead to the bank records, including copies of the bounced checks with the bank and bank account numbers at issue listed; and there was substantial evidence that this was an ongoing scheme or plan to defraud." CP 176 (CL 3(I)).

1/15/22

At the conclusion of the court's ruling, defense counsel objected that the court should hold an evidentiary hearing before ruling on the matter, pointing out there was no evidence on the issue aside from the officer's search warrant affidavit. 3RP 48. The court noted the objection without further remark. 3RP 48.

The trial court's conclusions of law are reviewed de novo. State v. Mendez, 137 Wn.2d 208, 214, 970 P.2d 722 (1999). The unchallenged

270 05 90 Pet
Pet #15

"knew that he did not have sufficient funds in or credit with the bank or depository to meet the check or draft in full upon its presentation" and that he intended to defraud. CP 99-103, 105-106.

If Haghghi was delusional in truly believing he had funds to cover the checks, a rational jury could find this delusional disorder negated the intent elements of passing bad checks and robbery. A jury could find Haghghi did not intend to deprive or defraud because he was deluded into thinking he had the funds available in his overseas bank accounts that he could use to pay back everyone once those funds were freed up. Dr. Trowbridge should have been contacted before trial and presented as an expert witness on the diminished capacity issue. Cf. State v. Turner, 143 Wn.2d 715, 730, 23 P.3d 499 (2001) (no deficiency in failing to present diminished capacity defense because it could not be determined from the record that any expert would have testified Turner lacked the ability to form the specific intent required to commit the crimes with which he was charged); Davis, 152 Wn.2d at 722, 732-33 (no ineffective assistance for not pursuing a mental illness defense after counsel consulted with five mental health experts, none of whom could conclude petitioner suffered from a mental illness, one defense expert opined petitioner did not suffer from illness that diminished capacity to commit crime, and petitioner refused to adopt any defense requiring an admission of guilt).

Handwritten notes on the left margin:
Pet #15
Pet #15
Pet #15
Pet #15
Pet #15

Handwritten notes on the bottom left margin:
270 05 90 Pet
31 Documents
32 Documents
33 Documents
34 Documents

OIC
P145

#9

Loga
Exhibit # A. 2 pages
Rec# #5

Released To MA
SAC NIELSEN
08-15-08

DO NOT DISCLOSE! <input checked="" type="checkbox"/>		SHERIFF		INCIDENT REPORT		07-336870	Page 1
Domestic Violence: <input type="checkbox"/>		KING COUNTY				182-F-0	District: S-5
Reported:	DOW	Time:	Incident Type:	Initial FCR	Court	Juvenile <input type="checkbox"/>	
11/20/2007	Tue	9:15	FRAUD, ALL OTHER	182-F-0			
Occ Between:	DOW	Time:	And:	DOW	Time:	LocationName:	
1/1/1985	Tue		11/20/2007	Tue			
Incident Location:				City:	State:	Zip	
401 4TH N(RJC JAIL) AV				KENT	WA	98032	

VICTIMS, WITNESSES AND OTHER PERSONS SECTION

Association:	Last, First Middle		Interpreter Needed <input type="checkbox"/>	Phone Numbers:				
VICTIM	HAGHIGHI, BARON N							
Address	City		ST	Zip				
RJC(JAIL)	KENT		WA	98032				
Sex	Race	DOB	Height	Weight	Hair	Glass'	Eyes	Facial Hair
M	W	3/22/1962	5' 8"	220	BLK		BRO	
Scars, Marks & Tatoos		Clothing		Gang		Set		
Occupation		Employer		OLN	ST	SSN	AFIS#:	

Association:	Last, First Middle		Interpreter Needed <input type="checkbox"/>	Phone Numbers:				
SUBJECT	AYAZZI, AMIR							
Address	City		ST	Zip				
			WA					
Sex	Race	DOB	Height	Weight	Hair	Glass'	Eyes	Facial Hair
M			5' 6"	190	BLK		BRO	
Scars, Marks & Tatoos		Clothing		Gang		Set		
Occupation		Employer		OLN	ST	SSN	AFIS#:	

MO

Suspect Tradem **REPORTED FRAUD**

Instrument:

Entry Point:

Entry Method:

PremisesType	Locked <input type="checkbox"/>	Occupied <input type="checkbox"/>	Total Property Co.
<input type="checkbox"/> Aid Req	<input type="checkbox"/> Weapons	<input type="checkbox"/> Injury	<input type="checkbox"/> Alcohol
<input type="checkbox"/> Computer	<input type="checkbox"/> Dom Viol	<input type="checkbox"/> Drug	<input type="checkbox"/> Juvenile
<input type="checkbox"/> Gang			

REVIEW

Date Submitted:	Reporting Officer:	Disposition:	
11/20/2007	01687 Ka, Edward K.	INCIDENT REPORT OVER TELEPHONE - NO ARREST/NO B	
Date Time Reviewed:	Reviewed By:	CID Screener:	Event Processing Status:
11/21/2007 10:30	09172 Davis, Steven L.	09172 Davis, Steven L.	Filed
Date Assigned	Investigator Assigned	Date Status Last Changed:	
		11/26/2007 8:49:28	

Jan 08 - 2008
How Judge Case
09-04-2008

5:26 #

CYC
File

#10

Site
#2

20 11 90
Part #5

Exhibit

DO NOT DISCLOSE: <input checked="" type="checkbox"/>	SHERIFF KING COUNTY	INCIDENT REPORT	07-336870	Page 2
Domestic Violence: <input type="checkbox"/>			182-F-0	District: S-5

Narrative:

Baron N. Haghghi called from the Jail at the RJC. Haghghi said that he had been charged and was serving time in Jail for Fraud by the Kent Police Department.

Haghghi said that his uncle Amir Ayazzi has committed Identify Fraud against him from 1985 to the present time.

I asked Haghghi how Ayazzi was related to him.

Haghghi said that Ayazzi is his father's cousin.

Haghghi said that Ayazzi became disgruntled and hostile when he did not receive a share of the family wealth. Haghghi said that he just learned within the last (8) months that Ayazzi has had access to family records to include his tax records and social security number and had opened several accounts under his name. Haghghi said that he has suffered losses in the millions. Haghghi said that Ayazzi is computer savvy and a businessman that travels throughout Europe.

I asked Haghghi how he knew his uncle was responsible for the fraud.

Haghghi said that his uncle told him.

Haghghi said that Ayazzi's whereabouts are unknown.

I put Haghghi on hold while I called King County Sheriff's Dispatch for a case number. I obtained a case number of 07-336870.

Haghghi said that he would provide documents showing the fraudulent activity.

I told Haghghi that this case would be documented.

Certification

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

Date and Place: _____ Signature/Agency: _____

END OF REPORT

Page

17) of (a) people

facts are verities. State v. Hill, 123 Wn.2d 641, 644, 870 P.2d 313 (1994).

ON December 2009
Supreme Court decision
not consistent with the Washington Constitution

The Supreme Court has not yet decided whether the inevitable discovery doctrine applies under article I, section 7 under any set of circumstances. State v. O'Neill, 148 Wn.2d 564, 592 n.11, 62 P.3d 489 (2003) (inevitable discovery rule inapplicable because there would be no incentive for the State to comply with article I, section 7's requirement that the arrest precede a search incident to arrest). The Court of Appeals has held the inevitable discovery doctrine is compatible with article I, section 7 protections under certain limited circumstances. State v. Richman, 85 Wn. App. 568, 577-78, 933 P.2d 1088 (1997). Under the rule adopted by the Court of Appeals, "[e]vidence obtained through illegal means is admissible under the inevitable discovery doctrine if the State can prove by a preponderance of the evidence that the police did not act unreasonably or in an attempt to accelerate discovery, and the evidence would have been inevitably discovered under proper and predictable investigatory procedures." State v. Avila-Avina, 99 Wn. App. 9, 17, 991 P.2d 720 (2000).

To ensure the inevitable discovery doctrine does not undermine the purposes of the exclusionary rule, the State must show the legal means of obtaining evidence would have been "truly independent" from any

13/12/17 (17) 1/2

1/2/17 #2

unlawful action. Id. at 18. In this regard, the doctrine "allows neither speculation as to whether the evidence would have been discovered, nor speculation as to how it would have been discovered." Id. (citation omitted). "[P]ost hoc suggestions of alternate legal means will not be accepted as a basis for application of the inevitable discovery exception." Id. (citation omitted).

But that is precisely what the trial court did here in ruling that the State would have inevitably discovered the bank records by means of a subpoena duces tecum once it filed charges. The trial court assumed the State would have filed charges without obtaining the ill-gotten bank records, but the State produced no evidence on that point. The State argued the point, but argument is not evidence. Supp CP __ (sub no. 94, supra). Furthermore, theorizing the State would have obtained the records via a subpoena duces tecum is nothing more than a post hoc suggestion of an alternate legal means. Again, there is nothing to back up this claim aside from the State's argument, which is not evidence. It is speculation that the State would have inevitably discovered the bank records in the absence of substantial evidence on the issue.

The State also failed to satisfy its burden of proof because it produced no evidence that police were pursuing an alternative line of investigation into the crimes for which Haghghi was ultimately charged at

Supplemental
Records
Produced

the time of the illegality. Avila-Avina, 99 Wn. App. at 19-21. Police had no independent reason to search Haghghi's bank records before the search took place. There was only one line of investigation into Haghghi's activities. For these reasons, the court therefore erred in concluding the inevitable discovery doctrine applied. CP 176-77 (CL 3(I), 3(J), 3(K)).

The trial court further erred in failing to hold an evidentiary hearing before deciding the State proved by a preponderance of the evidence that the bank records would have been inevitably discovered.

CrR 3.6 specifies the duties of the court:

(a) Pleadings. Motions to suppress physical, oral or identification evidence, other than motion pursuant to rule 3.5, shall be in writing supported by an affidavit or document setting forth the facts the moving party anticipates will be elicited at a hearing, and a memorandum of authorities in support of the motion. Opposing counsel may be ordered to serve and file a memorandum of authorities in opposition to the motion. The court shall determine whether an evidentiary hearing is required based upon the moving papers. If the court determines that no evidentiary hearing is required, the court shall enter a written order setting forth its reasons.

(b) Hearing. If an evidentiary hearing is conducted, at its conclusion the court shall enter written findings of fact and conclusions of law.

First, the court erred in failing to enter a written order stating why it did not conduct an evidentiary hearing on the issue of inevitable discovery. CrR 3.6(a) unambiguously requires such an order.

Direct 9/11 report

Because the court failed to give a reason for not conducting an evidentiary hearing, Haghghi is hampered on appeal from demonstrating the court abused its discretion in failing to hold that hearing.

The trial court's decision not to "to allow oral testimony, in addition to affidavits, when hearing a motion to suppress evidence" is reviewed for abuse of discretion. State v. McLaughlin, 74 Wn.2d 301, 303, 444 P.2d 699 (1968). A trial court abuses its discretion when its decision is manifestly unreasonable or based on untenable grounds. State ex rel. Carroll v. Junker, 79 Wn.2d 12, 26, 482 P.2d 775 (1971). A court's decision is manifestly unreasonable if it is outside the range of acceptable choices, given the facts and the applicable legal standard. In re Marriage of Littlefield, 133 Wn.2d 39, 47, 940 P. 2d 1362 (1997). "The range of discretionary choices is a question of law and the judge abuses his or her discretion if the discretionary decision is contrary to law." State v. Neal, 144 Wn.2d 600, 609, 30 P.3d 1255 (2001). Indeed, a court necessarily abuses its discretion "if it based its ruling on an erroneous view of the law." State v. Quismundo, 164 Wn.2d 499, 504, 192 P.3d 342 (2008).

We do not know the trial judge's view of the law because he did not explain why an evidentiary hearing was unnecessary. Nevertheless, it is apparent that an evidentiary hearing was needed here because the court's ruling was an exercise in speculation without a fully developed record.

2/20/07 9:10 pm

Exhibit # 2

The dispositive issue here is that the State failed to satisfy its burden of proof on the issue of inevitable discovery. Reversal on all counts and suppression of the unlawfully obtained bank records is the remedy. In the event this Court is disinclined to find the State failed to sustain its burden of proof, then this Court should still remand for an evidentiary hearing on the issue so that Haghghi is given a fair opportunity to fully develop the record on the inevitable discovery issue.

5. INADEQUATE JURY INSTRUCTIONS VIOLATED HAGHIGHI'S RIGHT TO BE FREE FROM DOUBLE JEOPARDY BECAUSE THEY EXPOSED HIM TO MULTIPLE PUNISHMENTS FOR THE SAME OFFENSE.

The court needed to clearly instruct the jury that it could not convict Haghghi twice on the basis of a single act. The instructions that were given subjected Haghghi to double jeopardy. One of Haghghi's convictions for unlawful issuance of a bank check must therefore be vacated.

"The right to be free from double jeopardy . . . is the constitutional guarantee protecting a defendant against multiple punishments for the same offense." State v. Borsheim, 140 Wn. App. 357, 366, 165 P.3d 417 (2007); Wash. Const. art. I, § 9; U.S. Const. amend. V. A defendant's right to be free from double jeopardy is violated if instructions do not make it manifestly apparent to the jury that the State is not seeking to

2006 90 1000
Case received by BN [unclear]
February - 20 - 2009 legal mail

Exhibit #2

COA NO. 61436-3-I

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
DIVISION ONE

STATE OF WASHINGTON,

Respondent,

v.

BARON NADDER HAGHIGHI,

Appellant.

ON APPEAL FROM THE SUPERIOR COURT OF THE
STATE OF WASHINGTON FOR KING COUNTY

The Honorable Dean Lum, Judge

BRIEF OF APPELLANT

CASEY GRANNIS
Attorney for Appellant

NIELSEN, BROMAN & KOCH, PLLC
1908 East Madison
Seattle, WA 98122
(206) 623-2373



Exhibit #1

2300 98 1-5-11

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Noted Unconstitutionality in the Constitution December 3, 2019

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Concise set
copy of email
in question

29-4-90 memo

Exhibit # 3

(Ack of my attorney to proceed
DT this time

IF the Court of Appeals does not
wish for me to proceed since
Due to the many complexities of the
case at hand. AS I am not
A legal professional.

20-0000-1-9-10

Received
March 1 2010

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

1908 E. MADISON STREET
SEATTLE, WASHINGTON 98122
Voice (206) 623-2373 Fax (206) 623-2488
WWW.NWATTORNEY.NET

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ERIC BROMAN
DAVID B. KOCH
CHRISTOPHER H. GIBSON

DANA M. LIND
JENNIFER M. WINKLER
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CASEY GRANNIS
JENNIFER J. SWEIGERT

OFFICE MANAGER
JOHN SLOANE

LEGAL ASSISTANT
JAMILAH BAKER

OF COUNSEL
K. CAROLYN RAMAMURTI
JARED B. STEED

February 26 2010

Baron Haghghi
No. 7211125
Monroe Correctional Complex
P.O. Box 7001
16700 177th Ave SE
Monroe, WA 98272

Re: State v. Haghghi (No. 61436-3-I)

Dear Mr. Haghghi:

I write in response to your letter dated February 22, in which you request to speak with me about a legal issue.

I am not able to speak with you. You are no longer my client. My representation on your direct appeal is over. My limited time and resources are devoted to current clients. I do not have the time or resources to speak with former clients about legal issues. Please note any future phone calls from you or your mother will not be accepted.

You will need to figure the issue out on your own or seek help elsewhere.

Sincerely,



Casey Grannis
Attorney at Law

3/10
Mr. Zuckerman
Mr. Dixon

Filed 9/22/09

This letter returned to sender
12/12/08

LAW OFFICES OF

NIELSEN, BROMAN & KOCH P.L.L.C.

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ERIC BROMAN
DAVID B. KOCH
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LEGAL ASSISTANT
JAMILAH BAKER

OF COUNSEL
K. CAROLYN RAMAMURTI
JARED B. STEED

September 18, 2009

Baron N. Haghghi
No. 7211125
Monroe Correctional Complex
P.O. Box 7001
16700 177th Ave SE
Monroe, WA 98272

Received: 09-22-09
Added to my Telephone
list on this
date

Re: State v. Haghghi (No. 61436-3-I)

Dear Mr. Haghghi:

You requested I ask if anyone in my firm would be willing to work on your personal restraint petition as a private hire. No one in my firm is able to do that. In speaking with you before, I failed to realize no one in my firm would be able to help you because of potential conflict of interest problems. If it turned out I was ineffective in representing you on direct appeal, that ineffectiveness could be an issue in a personal restraint petition. In that event, the attorney handling your petition would be forced to argue a colleague was ineffective. That is a conflict of interest.

I am giving you the contact information for two attorneys outside my firm. I have not spoken to them about your case. You may wish to contact them and see if they are willing to be hired to help with your personal restraint petition:

David Zuckerman
705 2nd Ave Ste 1300
Seattle, WA 98104-1797
(206) 623-1595

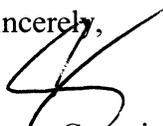
Letter 09-22-09
Outgoing Log #

> sent out Wednesday
09-23-09

James Dixon
216 1st Ave S Ste 202
Seattle, WA 98104-3454
(206) 957-2247

Letter 09-22-09
Outgoing Log #

sent out Wednesday
09-23-09

Sincerely,

Casey Grannis
Attorney at Law

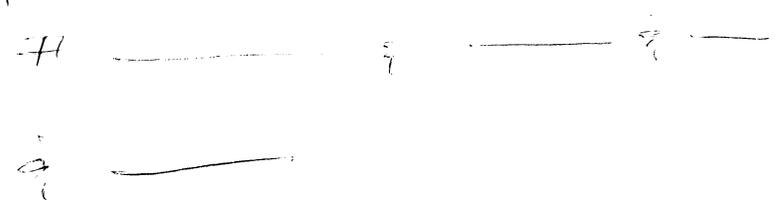
26 of 30 pages

Exam #5

Part #5

Exercises as related to the
Issues of Mental Health Issues
& availability of FUNDS

Please also know symbols:



200-1-21-1-96

Page #6

44.b.t
B
2 pages
1/11/05



21 00 31 1 2005
DATE RECEIVED 11/05/05
Due to credit transfer
Previous consumer 11/05/05 581 82
7/58/06/01

REQUEST FOR CONSUMER STATEMENT

Please Review all

You are entitled to add a statement to any item of information contained in your consumer file. Should you wish to add a statement, please complete this form and mail it to ChexSystems, Attn: Consumer Relations, 7805 Hudson Road, Suite 100, Woodbury, MN, 55125 or fax it to 602-659-2197. If you would like assistance in writing a clear summary of your dispute statement, please contact ChexSystems at 800-513-7125.

SECTION 1 - CONSUMER PERSONAL IDENTIFIERS

Consumer ID (obtain from consumer report): 5819294 and 15810661

Full Name: Baron N. Haghighi Social Security Number: 549-57-4881

Drivers License Number: HAGHIGHI 385015 State of Issuance: WA

Business Name (if applicable): New Millennium International Tax ID#: 91-1905692

Current Address: 40 Lake Bellevue Drive. Suite 100
Bellevue WA. 98005

SECTION 2 - REQUEST FOR CONSUMER STATEMENT

Please provide the information below for each item you wish to add your statement to.

1. Source of information statement is being added to: _____

Account number: US 153 57 584 908 Date listed on item: N/A
And acct # 153 557 585 194

2. Source of information statement is being added to: _____

Account number: 119 000 775 296 Date listed on item: N/A

3. Source of information statement is being added to: _____

Account number: _____ Date listed on item: N/A

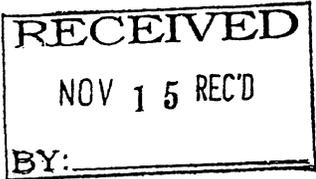
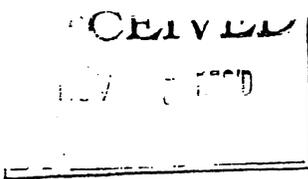
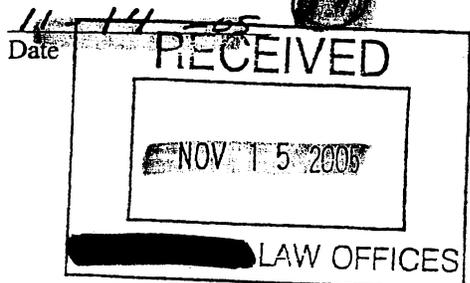
4. Source of information statement is being added to: Home Street Bank

Account number: _____ Date listed on item: _____

I have never held an account at this bank your reports false
Please provide the exact text you wish to be added as your statement. Use additional pages if needed. Please limit your statement to 100 words (200 words for residents of Maine). Your statement must be written in your own words, and may not contain names of any other individuals or companies not associated with the information.

I - Washington Area US Bank in Federal way was my
Close my account because of the lack of experience
of the branch manager. This will become my lawsuit against
Trans Security. Both of these banks close my account
based on chex systems false information gathering
such as the case of Home Street Bank at which I have
never held an account. This will become a lawsuit
against Chex System if not corrected

Baron N. Haghighi
Consumer Signature



209

3201 911 page
Page #6
ChexSystems

RECEIVED

NOV 28 REC'D

BY: B. N. Haghighi

4 Copies each
Please

FAXED
NOV 29 2005

CONSUMER REQUEST FOR REINVESTIGATION

ChexSystems will reinvestigate any item listed in your consumer report that you believe may be incomplete or incomplete. In order for a reinvestigation to be initiated, please complete this form and mail it to ChexSystems, Attn: Consumer Relations, 7805 Hudson Road, Suite 100, Woodbury, MN 55125 or fax it to 602-659-2197. ChexSystems will contact the source of the information to notify them of your dispute and will inform you of the results of the reinvestigation by mail within approximately 30 days. In order for us to perform a complete reinvestigation, please provide all of the following information:

SECTION 1 - CONSUMER PERSONAL IDENTIFIERS

Consumer ID (obtain from consumer report): 5812294

Full Name: Baron N. Haghighi Social Security Number: 564-57-4881

Drivers License Number: HAGHINA 38502 State of Issuance: WA

Business Name (if applicable): New Millennium Intl. Tax ID#: 91-1905692

Current Address: 40 Lake Bellevue Drive, Suite #100 - Bellevue WA 98005

SECTION 2 - REQUEST FOR REINVESTIGATION

If disputing multiple items please provide the information below for each disputed item. Use additional paper if needed.

② 1. Source of Disputed Information: Pacific Bank
Account number: 011004975 Date listed on disputed item: 10-27-2000

③ 2. Source of Disputed Information: Washington Mutual Bank
Account number: 018800004534182 Date listed on disputed item: 11-16-2005

④ 3. Source of Disputed Information: U.S. Bank
Account number: 153557584908 Date listed on disputed item: 10-24-2005

⑤ 4. Source of Disputed Information: All State Bank
Account number: 118000775635 Date listed on disputed item: 10-25-2003

Nature of dispute:

Please provide a detailed explanation of your specific dispute of each item. Use additional paper if needed.

① I have attempted to send payment for this issue it amounts amounts to approximately \$20.00, it will be paid as soon as possible
② please review page 1 - (result of Identity Theft)

③ y ✓ ✓ ✓ ✓

④ y ✓ ✓ ✓ ✓

Baron N. Haghighi
Consumer Signature

Nov-29-2005
Date

PRIVACY GUARD

45416663

Baron Haghighi
West

37206 2nd Ave SW

Federal Way WA 98003-7215

158

330691 papers

part # (C)

June 25, 2007

BARON HAGHIGHI
C/O INMATE MAIL SERVICES
KING COUNTY DEPT OF CORRECTIONS AT THE RJC
401 - 4TH AVE.
KENT WA 98032

ATTORNEY-CLIENT CORRESPONDENCE

Re: STATE v BARON HAGHIGHI, SUPERIOR COURT, CHARGES: BAD CHECKS:06-1-10032-4 KNT;
next court date: omnibus: July 6,2007; jury trial: July 6,2007

You wrote during the week demanding that I visit you again. I note that at my last jail visit with you and defense investigator Mr. Porteous, you disrespectfully told me that you did not wish to speak with me, but that you would speak with Mr. Porteous. Please let me know what you would like to discuss with me now since I do not wish you to waste your time nor waste my time to come to jail, then sit and listen to your insults.

Mr. Porteous reports that you described two conflicting reasons for passing bad checks as alleged by the State: that you were unaware that your various bank accounts were unlawfully emptied of large amounts of money, suddenly looted by a Mr Ayazzi in Iran because of a vendetta against you and your entire family, relating to your late father, the former finance minister of Iran during the reign of the Shah of Iran, that you were unaware of the lack of funds until the banks rejected them for NSF. You also told Mr. Porteous that you wrote the checks under the influence of self-administered champaign and cocaine, due to post traumatic stress caused by dealing with 37 assassinated relatives and was not thinking straight and that the charges were brought by impatient merchants who presented the checks to the banks without waiting for you to deposit funds, as you instructed.

Due to these conflicting accounts, while you have a right to give testimony during trial, I do not recommend you do so. Accordingly, unless you advise me otherwise, I will assume that the trial will be a test of the strength of the State's case against you and will prepare accordingly. I will see you at the Omnibus hearing. Please be on your best behavior.

Lastly, I instructed Mr. Porteous to focus his efforts on the State's witnesses.

LAW OFFICE OF JOSEPH CHALVERUS

Joseph Chalverus
Attorney at Law
JC/dd.lc6
file: HAB10KNT.BADCKS
cc: Investigator

34 of 90 1290

Foot # 7

1 acre of susceptibility of
Calyx + water previous 1290
DE of Price to Tana Price
1 acre of Transcription

Writ of
Habeas
Corpus

35 of 91

- 1 Honorable Judge Robinson
- 2 Superior Court of King County
- 3 401 4th Avenue North
- 4 Kent Washington 98032

Re: Writ of Habeas
Corpus
Substitution of Counsel
Pursuant to Rule 11
From: Baroda, Washington

Cross # 06-1-10032-46

6 Honorable Judge Robinson

8 please consider this my writ of
9 Habeas Corpus in reference to this matter as
10 the direct result of

12 ① The six counts against me at this court are
13 UNINVESTIGATED & WITH OUT MERIT. I do not have
14 a lawyer that has or intends to investigate these
15 allegations against me.

18 ② Mr Joseph Chel Jones is not acting in my best
19 interest in that, he has not - does not wish to
20 investigate the matter in spite of the fact me & my
21 family have tried to communicate but it has
22 become moot & a failure.

24 ③ This case is illegal in that I am
25 innocent till proven guilty. This case is in
26 violation of my civil & constitutional rights.
27 The allegations will be proven false with
28 proper investigation & representation.

29 ④ The prosecutor is over zealous in that
30 ① The allegations are false and not
proven in violation of my 14th Amendment rights (3) →

1. The prosecutor has turned T.O.'s into Guilty
 2. Till now, innocent violation of 9th of 4th amendment
 3. (3) - No detailed investigation has ever been
 4. Submitted or none has been done by no one
 5. (4) I do not have the effective assistance
 6. of Counsel.

7
 8. (5) I did not - do not have adequate -
 9. investigation or representation in that
 10. (1) - All these allegations are false &
 11. without merit, but no one cares.
 12. (2) - my current attorney Mr. Chelene is
 13. ineffective, rude, arrogant, & I had to
 14. (3) - no one has interviewed my witnesses
 15. and verified the exact truth.

16. (4) - I have been harassed in this case for 5 1/2
 17. months in violation of my speedy trial rights
 18. (5) - I have confirmation of the identity theft
 19. in my hands, but no one is interested.

20. (6) This identity theft issue is being
 21. reported to the Federal Trade Commission

22. (7) - I am in the process of filing police
 23. reports in reference to this issue now

24. (8) I will also be filing charges on witnesses
 25. in this case - Due to false charges' statements

26. (9) It is therefore a civil action - 1283 is
 27. filed against me Louis Farber Cause#

28
 29. As these charges are
 30. filed against me are false & without merit

31. In that, I did not knowingly work these
 32. checks knowing that they are not good (9) ->

pg (4) of 2
Writ of
Habeas
Corpus

1 It was Quite To the Contrary. This
2 Will be proven beyond a shadow of a
3 Doubt. I am INNOCENT. I am ready
4 To prove it.

5
6 I need an Emergency Hearing To
7 Formally be on the Record, To
8 Bring all True Facts VS Allegations
9 OF my wrong Doing To The Table of
10 The Supreme Court.

11
12 From what I Understand the
13 Prosecutors have The Intention to file
14 me Consecutive Sentence To my
15 Smoke mish County case. This is with
16 Out wait To seek Two types of
17 Sentence with out a Fair trial or
18 any Type of Investigation done To verify
19 These False Charges.

20 AT This time I submit This Writ of Habeas
21 Corpus To the Honorable Supreme Court For
22 an Emergency Hearing for an In depth discussion
23 of This case and To allow for justice To
24 Prevail In This case.

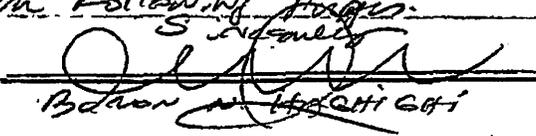
25
26 The Facts of This case merit a In depth
27 Investigation & Evaluation by a Attorney
28 wishing To be part of The solution, not a
29 part of The problem. I Unlike The previous
30 Request that took over 4 months To Submit

page (5) of 1 In This Particular Case I submit, I am not
(8) able to work with Mr. Chelvaraz
page 3

4 I Sight The Facts of my 5th, 6th, 8th,
5 9th and 10th amendment rights, as I am
6 afraid I will not be able to Request
7 from this Lawyer Equal Rights in Similar
8 To Other persons before the Court

9
10 I am also Sighting the Rules of professional
11 Conduct for Lawyers, Prosecutors, Judges
12 (N.P.C.) (#1) — 1.2 (a) The Court has not
13 abided for my decision to change to an
14 effective Counsel, particularly for change of Venue
15 (N.P.C.) (#2) (3.2) This Lawyer, Prosecutor's
16 This Court has not helped me in ascertaining
17 a fair, public, speedy Trial as well as
18 N.P.C 8.4 as it is now a Total Break
19 Down of Communication & Inconcilable
20 Matters between me & Mr. Chelvaraz.

21
22 I am seeking a pro bono attorney and I
23 am aware of the fact this is my final
24 chance & the final Counsel that the Court
25 will assign for me. I seek justice as I
26 place my self in the hands of the Honorable
27 Court, I submit the following facts as
28 evidence in this case in the following pages.

29
30

P. S. Srinivas

Dated This 22 day of May 2007

3335 Sweet Road
Blaine, Washington 98230

May 17, 2007

To Whom It May Concern:

I write this letter in response to a situation that occurred Wednesday, May 16 at the King County Justice Center on West James Street in Kent, Washington.

I accompanied Shamie Gerwick, Baron Haghighi's mother to his Case Setting Hearing in Courtroom GA with Judge Robinson at 1:00 p.m. I attended at her request to help advocate for she and her son. She is a very anxious mother who has been around the justice system with her son for nearly 25 years.

At the request of her son, she contacted his Public Defender, Joseph Chalverus by phone about a week ago to get some clarification regarding his case. Shamie, is a very polite and proper woman of Iranian descent who speaks broken, but understandable English. Mr. Chalverus was demeaning in his response to her and told her that he didn't have time for her "garbage" English and that she needed to find someone who could speak English. She offered to bring me to help clarify and he agreed to meet us between 12:30 and 1:00 p.m., before the hearing.

We arrived at the court house well ahead of the scheduled hearing. We talked with a gentleman in the Public Defender's Office about the best place to wait for Mr. Chalverus. When he did not show up by 2:45 p.m. and Mr. Haghighi's case had not been addressed, we asked for additional help locating him. The same gentleman said he would let us know when Mr. Chalverus arrived, which he did about 3:00 p.m.

I waited while he was talking with another client, who "fired" him on the spot for his rude behavior, and then approached him. He told us "I don't have time to meet with you. You will have to call my office". When Shamie told him that she had done that and he agreed to meet us he curtly said, "I said no such thing".

I indicated that I had driven 130 miles to meet with them and his retort was, "Well, I have been up since 6 a.m. I then asked if he would meet with us and he said he had to go to hearings, turned his back and summarily walked off. I followed him politely asking when he would return and he said without even looking back, "You will have to sit and wait until I am ready". We waited for an additional 45 minutes when he finally returned and said "I have 10 minutes to talk.

Shamie tried to ask her questions with her best English, but Mr. Chalverus interrupted her before she could finish and said, "She says everything

May 29-2007
Agreed To Surrender
Court of King County
Washington via mail
Ordered To Wait of Haghighi
Cases.

(2) of 91 page
backward. I know what she means, but she can't say it right". I did my best to try and get some information about what was happening to her son at this hearing.

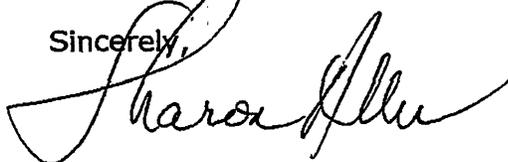
When she talked about conversations she had with a Doctor from Western State Hospital about Mr. Haghghi's mental health issues, he said, "She doesn't know what she is talking about - they don't do that". Mr. Chalverus displayed very limited knowledge about the specific case and dismissed her concerns about proper treatment of ongoing mental health issues by saying that "everyone in jail has mental health issues". He made it abundantly clear by his demeanor that he frankly didn't care.

I was appalled at the disrespectful treatment both of us received at the hands of a "public servant". I understand the lawyer, defendant relationship and issues of confidentiality. However, Mr. Chalverus could have respected the lawyer/client relationship and given us general information in a civil fashion.

A woman by the name of Summi, who works at the court reception desk was very concerned and helpful, treating us with dignity and respect while giving us as much information as possible. We were given much of the general information we were seeking from other attorneys standing in the hallway waiting for their cases to come up.

As a result of our treatment by Mr. Chalverus, we felt marginalized and discriminated against on both gender and racial grounds. I strongly believe that Public Defenders have an ethical and moral obligation to serve those without means with dignity and respect. I hereby request that Mr. Chalverus make an immediate change in his demeanor toward his clients or serve in some other legal capacity where he may be more effective.

Sincerely,



Sharon Aller
For Shamie Gerwick and Baron Haghghi

12910N N. STARBUCK

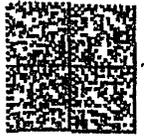
206 01



Regional Justice Center

620 West Janna St.

Kent Washington 98032



047482011303
\$00.589
05/29/2007
Mailed From 98032
US POSTAGE

(11) (91) 10910

Honorable Judge Palmer Robinson
King County Superior Court
401 - 4th Avenue North
Kent Washington 98032

Legal mail →

RECEIVED

MAY 3 0 2

JUDGE PALMER, JR.
K.C. SUPERIOR COURT

4/2 at 4/1 1-96

**Superior Court of the State of Washington
For the County of King**

Palmer Robinson
Judge

June 4, 2007

Mr. Baron N. Haghighi
#206952246
King County Jail
Regional Justice Center
620 West James Street
Kent, WA 98032

Regional Justice Center
401 - 4th Avenue North
Kent, Washington 98032

FILED
KING COUNTY, WASHINGTON

JUN 05 2007

SUPERIOR COURT CLERK
RENEE JANES
DEPUTY

Re: **State of Washington v. Haghighi**
King County Cause #06-1-09836-2KNT

Dear Mr. Haghighi:

06-1-10032-4 KNT ✓

You are being represented in the above-referenced case by counsel. You do not have the right to represent yourself and file pleadings at the same time that you are represented by counsel. Accordingly, I am filing your Motion/letter re discovery dated May 29, 2007 in the court file without any action being taken.

Very truly yours,



Palmer Robinson
King County Superior Court Judge

PR: cdc

cc: Mr. Joseph Chalverus (w/enclosures)
Ms. Christine Hermann, DPA (w/enclosures)

51A

3

Name Baron N. Haggis

Box # 206052 246

City KC

State MO

Zip KC

RECEIVED

MAY 30 2007

JUDGE PALMER ROBINSON
K.C. SUPERIOR COURT

Legal
Mail



Hon. Judge P. Robinson
King County Superior Court

401. 4th Avenue

Kent Washington 98032



9803284429 0004



1701
PAYROLL
JOURNAL

Reg & Dir 70 USBA F: 19#

17010000 pages

1701-#1

DEPARTMENT / EMPLOYEE NO. / RATE		HOURS				TAXES							NET PAY	GR
EMPLOYEE NAME		REGULAR	OTHER	OVER TIME	TYPE	OTHER	GROSS	FEDERAL	FICA	STATE	LOCAL	WK. COMP.	TYPE AMOUNT	
M-05	6A 02912 6,250.00													
GILBERT, DON		8666					625000	105615	47813					471572
	72.1209	8666					625000							500
M-08	74881 12,500.00													
HAGHIGHI, BARON		8666					1250000	287081	95625					867294
	44.2419	8666					1250000							500
M-08	10537 5,000.00													
KAPITONENKO, OLGA		8666					500000							399042
	57.6967	8666					500000	62708	38250					500
M-03	35880 4,000.00													
KRAVCHENKO, ALEXANDR		8666					400000	54375	30600					315025
	46.1574	8666					400000							500
M-03	53542 4,000.00													
KRAVCHENKO, GALINA		8666					400000	54375	30600					315025
	46.1574	8666					400000							500
<i>Handwritten: Husband & wife</i>														
<i>Handwritten: Released to my attorney</i>														
<i>Handwritten: New Clientes from Nov - 07-12-07</i>														
COMPANY TOTALS														
PAYROLL TOTALS		43330	3175000											31,750
WEEK END DATE		242888	564154									2367958		5
EMP COUNT														

477. 1. 913 (10) 2

(100-71 2)



STATE OF WASHINGTON

MASTER LICENSE SERVICE REGISTRATIONS AND LICENSES

UNIFIED BUSINESS ID #: 601 888 463
BUSINESS ID #: 001

EXPIRES : 07-31-2000

ORGANIZATION TYPE
DOMESTIC PROFIT CORPORATION

NEW MILLENIUM INTERNATIONAL ENTERPRIZES CORP.
3717 214TH PL SE
ISSAQUAH WA 98029 9517

DOMESTIC PROFIT CORPORATION
RENEWED BY AUTHORITY OF SECRETARY OF STATE

REGISTERED TRADE NAMES:
NEW MILLENIUM INTERNATIONAL ENTERPRIZES
PARS INTERNATIONAL ENTERPRISES

The above entity has been issued the business registrations or licenses listed
DEPARTMENT OF LICENSING, BUSINESS & PROFESSIONS DIVISION,
P.O. BOX 9034 OLYMPIA, WA 98507-9034 (360) 664-1400

Paul Stephens
Director, Department of Licensing

0005792 SP

STATE OF WASHINGTON
EXPIRATION DATE
07-31-2000
LIB NUMBER
601 888 463 001
NEW MILLENIUM INTERNATIONAL ENTERPRIZES
CORP. 3717 214TH PL SE
ISSAQUAH WA 98029 9517

*Export/Export
automobiles, food, const. equip.
clothing, 5.A. Japan
to Europe*

Paul Stephens
Director, Department of Licensing

DETACH THIS SECTION FOR YOUR WALLET

R 265

Verification of my Company. (1) et (2) 1-10
part 3

STATE OF WASHINGTON

Unified Business ID #: 601 888 463
Business ID #: 1

Expires: 07-31-2009

NEW MILLENIUM INTERNATIONAL ENTERPRIZES CORP.
3117 214TH PL SE
SAMMAMISH WA 98075

07-31-2009

Domestic Profit Corporation
Renewed by Authority of Secretary of State

REGISTERED TRADE NAMES:
NEW MILLENIUM INTERNATIONAL ENTERPRIZES
NEW MILLENIUM INTERNATIONAL ENTERPRIZES CORP.
PARS INTERNATIONAL ENTERPRISES



I hereby certify that the above information is true and correct to the best of my knowledge and that business will be conducted in compliance with all applicable Washington State, county, and city regulations.

Elizabeth A. Luce
Director, Department of Licensing

IBI NO. 601 888 463 1
NEW MILLENIUM INTERNATIONAL ENTERPRIZE
3117 214TH PL SE
SAMMAMISH WA 98075

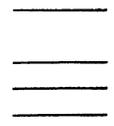
EXPIRATION DATE
07-31-2009

FOLD HERE

FOLD HERE

Elizabeth A. Luce
Director, Department of Licensing

DETACH THIS SECTION FOR YOUR WALLET



Released
To Court
March 13 - 2010

Funds Pre-Advice

February 14, 2010

4/16/10
#2
[Noted]
Use with witness for m
In court
If state want
I will use
me more
Trans
M...
...
...

Private & Confidential

RE: Confirmation of Funds Availability: \$150,000,000.00 USD
Account Code Number CRD 2496191

For: Banking Liaison to Metro Bank
Mr. Arthur Ty

Reference: Baron Haghghi

To Whom It May Concern/ [Redacted] /Mr. Don Gilbert/Mr. Stephen
Adler, First Swiss Depository Trust AG:

We hereby confirm to you, with full bank responsibility, the availability of funds in the amount of One Hundred and Fifty Million United States Dollars (\$150,000,000.00 USD) on deposit in our bank for the benefit of the above referenced account and account holder.

As per the request of our client, these funds have been reserved in time deposits and are to be maintained on deposit in our bank as of the date of this letter until, 2010. This account holder has authorized these funds to be used for the purpose of the confirmation of funds availability and per further instructions of the account holder these funds shall be wired to banking co-ordinances, which have yet to be supplied by the account holder.

I will be available February 26, 2010 at 9:00 am, at the Pan Pacific Hotel, Vancouver B.C. Canada to finalize banking issues for Baron N. Haghghi and to provide a cashiers check or wire transfer from First Swiss Depository Expenditures in the total amount of \$150,000,000.00 USD - One Hundred and Fifty Million U.S. Dollars, at this time. In addition the additional sums at a later date designated by Baron N. Haghghi.

CLEAN, CLEARED, LIEN FREE AND UNENCUMBERED FUNDS, EARNED FROM FINANCIAL CONSULTING FEES ON COMMERCIAL ENTERPRISES OF NON-CRIMINAL AND NON-TERRORIST ORIGINS, FOR SAME DAY SETTLEMENT.

Should you need to communicate with this bank regarding the above referenced transaction please call the following bank officer.

Sincerely

Michael Finnucci
Michael Finnucci
Investment Counsel
For Baron N. Haghghi

Sept 20 (1990)
10/17/90

Vertical Components of Affordances
Components of the Affordance
Functionality for the Case

210291 (1990)
p. 4 (9)

FILED
KING COUNTY, WASHINGTON

ENT'D.

JUL 23 2007

SUPERIOR COURT CLERK
LESLIE J. KEITH
DEPUTY

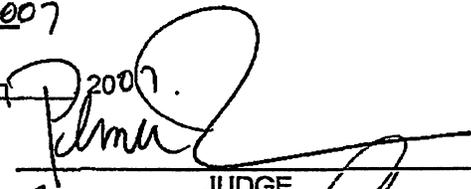
SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

STATE OF WASHINGTON,)	
)	NO. 06-1-10032 - LKNEF
Plaintiff,)	ORDER CONTINUING TRIAL
)	(ORCTD)
<i>BORDO v. NADDER NAGNIGNI</i>)	(Clerk's Action Required)
Defendant,)	
CCN)	

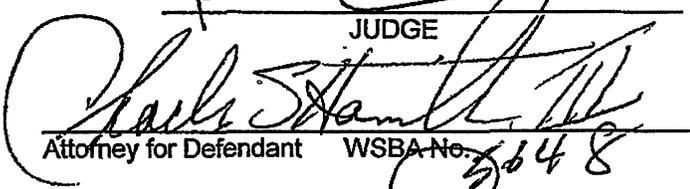
This matter came before the court for consideration of a motion for continuance brought by
 plaintiff defendant the court. It is hereby
 ORDERED that the trial, currently set for AUGUST 14, 2007 is continued to SEPT. 24, 2007
 *Upon agreement of the parties [CrR 3.3(f)(1)] or required in the administration of justice [CrR 3.3(f)(2)] for the following reason:

plaintiff's counsel in trial; defense counsel in trial; other: NEW COUNSEL
retained, needs time to prepare & investigate

It is further ORDERED:
 Omnibus hearing date is SEPT. 14, 2007
 Expiration date is OCT. 24, 2007

DONE IN OPEN COURT this 23 day of July 2007.

 JUDGE

Approved for entry:
Manda Frost 34045
 Deputy Prosecuting Attorney WSBA No.


 Attorney for Defendant WSBA No. 5648

I agree to the continuance:


* Defendant [signature required only for agreed continuance]

I am fluent in the _____ language, and I have translated this entire document for the defendant from English into that language. I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

 King County, Washington
 Interpreter
 Trial Continuance
 (Effective 1 September 2003)

68

ENT'D.

NON-TRIAL

Scomis Code: MTHRG

Department: 41

Date: 7.23.07

Page 1 of 1

JUDGE: PALMER ROBINSON

BAILIFF: CHERYL CUNNINGHAM

COURT CLERK: LESLIE KEITH

REPORTER: GARJC-07-144 840

King County Cause No.

06-1-10032-4

KNT

Case Caption

State of Washington

vs. Baron Haghighi

Litigants and Attorneys

State represented by D.P.A. Amanda Froh

Defendant present and represented by counsel Jc Chalverus

Minute Entry

Charles Hamilton is allowed to substitute in as counsel. Order signed

~~STATE/DEFENDANT MOTION TO CONTINUE TRIAL DATE GRANTED/DENIED~~

OH 9:14

TD 9:24

XO 10:24

Order signed

Superior Court of the State of Washington
For the County of King

Palmer Robinson
Judge

FILED
KING COUNTY, WASHINGTON

Regional Justice Center
401 - 4th Avenue North
Seattle, Washington 98032

June 4, 2007

JUN 05 2007

SUPERIOR COURT CLERK
RENEE JAMES

Joseph Chalverus
Lake City Law Center
P O Box 25050
Seattle, WA 98165

~~Christine~~ Herrman
Prosecuting Attorney
Regional Justice Center
401 - 4th Avenue North
Seattle, WA 98132

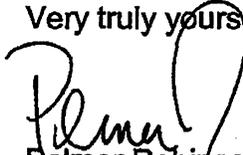
Re: **State v. Baron N. Haghighi**
King County Cause #06-1-09836-2KNT

06-1-10032-4 KNT ✓

Dear Counsel:

Enclosed please find correspondence I received from Mr. Haghighi dated May 24, 2007, the original of which has been filed. Please review the information to determine if any action needs to be taken.

Very truly yours



Palmer Robinson
King County Superior Court Judge

PR: cdc
Enclosure
cc: Mr. Baron Haghighi

51B

1 Superior Court Judge Palmer Robinson From B.N
 2 Superior Court of King County. Re: submission
 3 401 4th Avenue North of Walters ^{supra} Hobson
 4 Kent Washington, 98032. in case # Knt
 5 C-06-1-10032-4
 6 Honorable Judge Robinson

7
 8
 9 Effective Today, I in effect fired Mr.
 10 Joseph Chalvarez from my case. I tried to
 11 work with him he fails as yet a Super
 12 Representative of the Law, my cooperation
 13 with him stops today.

14
 15 via the following 7 pages including my
 16 notarized wait of Hobson Corpus I need
 17 to exercise my 3rd option as a client
 18 in need of effective assistance of counsel.

19
 20 I would sincerely appreciate the Honorable
 21 Courts prompt assistance in obtaining another
 22 attorney that is uniquely qualified to
 23 handle my case at hand, your prompt response
 24 is of the essence thank you for your
 25 assistance in this matter

26
 27 (ps) my name is BARN N. HOBSON (not)
 28 Waddan B. Hobson as on court file I would
 29 appreciate this to be Barn N. Hobson
 30 connected

sent me dated this 24th day of May 2007

55 (91) 1594

SUPERIOR COURT OF WASHINGTON - COUNTY OF King County - R.J.C

In Re Baron N. Haghighi

CAUSE # 06-1-10032-4 RNT

On Habeas Corpus,
Petitioner

CASE NO:

PETITION FOR WRIT OF HABEAS CORPUS

For Emergency Writ of Habeas Corpus Issuance Request.

I. PETITION

The undersigned states that:

1.1 Baron N. Haghighi is being restrained

by:

at Regional King county, Washington.

1.2 The cause or pretense of the restraint is: The charges placed on me in 6 counts of Unlawful Issuance of Bank checks are false. In this matter.

1.3 The restraint is illegal in that: Due to the fact that 1. Case has never been investigated by either of my assigned attorneys. 2. This case is as the result of an identity theft committed against me in this matter. The results at this time is the result of Unauthorized Use of my accounts by a member of my family.
The undersigned petitions the court to issue a Writ of Habeas Corpus to inquire into the legality of the restraint and to deliver the person restrained therefrom.

Dated: 05-22-07

[Signature]
Petitioner

II. VERIFICATION

STATE OF WASHINGTON

COUNTY OF King

The undersigned on oath states that:

2.1 I am the petitioner; and

2.2 I have read the above petition and believe it to be true.



[Signature]
Signature

Sworn and subscribed on:

Date: May 22, 2007

Notary Public in and for Washington

Residing at Leather, Wash

Part # 10

Mental Health Treatment

Forms

as well as have names
& Information of Patients

To seek Treatment upon
Release

57 06 (91) p.c.f.m

8/11/08

Dear Baron,

Thank you for contacting the Sidran Institute Help Desk. I am glad that the information you have received thus far has provided you with enough comfort to contact us. I have received your letter and understand you have already received an information packet from us and are interested in knowing more about the services we provide to those who are incarcerated as well as a list of therapists and reading recommendations.

Unfortunately, while we certainly understand that being incarcerated may be traumatic for some we do not provide specific services to those who are incarcerated. Rather, we provide all trauma survivors who are interested with a list of clinicians and reading recommendations that we customize or individualize based on their geographic area and "diagnosis" (ie PTSD, if they tell us).

I am happy to provide you with a list of clinicians. I tell everyone that I cannot guarantee that these clinicians are right for him or her. The Sidran Institute does not examine, determine, or provide a guarantee with respect to the competence of any clinician in our database. So please understand that I do not know these clinicians personally and therefore cannot vouch for their reputation. I highly suggest you or the individual seeking treatment interview each clinician they may be considering before making a decision. If you need help with this process, you can click on the following link, "What to Look for and How to Choose a Therapist"

<http://www.sidran.org/sub.cfm?contentID=62§ionid=4> It will take you to an article on how to choose a therapist. You may find it helpful to print this out. It contains a worksheet to help individual's decide which is the best therapist for them and has a list of questions you or the individual may want to consider asking. Remember that this interviewing process is as much the individual's decision as it is the therapist's. Here is what I have in Western Washington State:

William C. Heusler, MA
Alderwood Psychological Services Group
19221 36th Ave. W
Suite 207
Lynnwood, WA 98036
United States
[1] 206-909-7633

Vidya Vara, M.Ed, LMHC
Psychotherapy Services
1450 114th Avenue SE
#100
Bellevue, WA 98004
United States
[1] 206-423-7909

580691 page

Beverly Underwood, MSW
Newport Counseling Services
14929 SE Allen Rd.
Suite 102 A
Bellevue, WA 98006
United States
[1] 425-641-4189

Claudette S. Antuna, MSW
Sammamish Consulting & Counseling Services
14929 SE Allen Rd
Suite 102A
Bellevue, WA 98006
United States
[1] 206-948-3652

Carole Joan Jacobson, MS
600 Main Street
Suite D
Edmonds, WA 98020
United States
[1] 425-771-6356

Steve Akers
Akers Counseling PSC
3931 Colby Ave.
Everett, WA 98201
United States
[1] 425-388-0281

All claim experience in treating PTSD so I am hopeful that they may be able to help. However, I do not know if any are willing to counsel individuals who are currently in the prison system, or if you would have to wait until you are released to take advantage of their services. I admit that I am unfamiliar with your requested location, and I do not know what is a comfortable travel distance. This therefore, hinders my ability to accurately assess what might an adequate distance to travel. Baron, if these clinicians are too far away, do not offer the services you are looking for, or are otherwise not located near your area of interest, I recommend you consider calling them anyway. Ask them if they know of any resources, such as support groups or other therapists, in your area that may be able to help.

Barron, I do not know why you are in prison, nor do I exactly understand what you are asking for in #4 when you ask for recommendations as to PTSD violation of a no contact order which under new laws of state of Washington is considered Domestic Violence. However, both violating no contact orders and perpetrating Domestic Violence are serious charges. If you have done either of these things, the best course of action is to

seek treatment from a therapist who focuses in this area. In fact, I would encourage you to ask about this when you interview different therapists.

As for reading recommendations, I would suggest you check out the titles below. Some of these books may be available at your local library. If you are interested in ordering any of these books, you may do so through Sidran by visiting our website www.sidran.org and clicking on where it says "store". Here is a list of books I recommend:

The Wisdom of the 5 Messenger: Learning to follow the guidance of feelings
This is a book that just came from the printer. I like this book because it teaches that emotions are NOT dangerous, but instead messengers that communicate what is right and wrong in our lives and what we need. The author challenges people to understand what their feeling mean and that breeds room for personal growth.

The PTSD Workbook by Mary Beth Williams
This book was written for the survivor. It helps them learn how to understand and manage their PTSD symptoms. It is a workbook which guides the survivor through ways of gaining insight into their symptoms, beliefs, behaviors, and feelings. One reason I like this book is because it enables the survivor to record their recovery process by creating their own personal resources, which can be used over and over.

Managing Traumatic Stress Through Art by Cohen, Barnes, and Rankin
This is a great book for people who sometimes find it difficult to talk about their thoughts, feelings and beliefs. The survivor does NOT need any artistic talent. This book allows the trauma survivor to create another cathartic way of expressing oneself. The authors help with the development of basic tools of managing trauma. They also assist the survivor to acknowledge and regulate his or her emotions and develop strategies to function in today's world.

Restoring Hope and Trust; An Illustrated Guide to Mastering Trauma by Lewis, Kelly, and Allen
I recommend this book for the survivor and the professional. It has a ten-session course that brings old and new understanding together in the psycho educational approach-using simple language, illustrations, awareness exercises, and study questions to guide readers-whether they are people on the healing journey or clinicians. Author Lisa Lewis notes the importance of learning new strategies for dealing with past trauma: "Too often patients want to jump into the processing [of trauma] before they have found healthy ways of regulating their emotions. It's important to be able to talk about the emotions, but not to be overwhelmed by them. We want the details to eventually bleach out and become more like other memories of what has happened in a persons' lifetime. Our goal is to rob the trauma of its power."

The Post Traumatic Stress Disorder Sourcebook by Glenn Schiraldi
This book offers a remarkable range of treatment alternatives and self-management techniques which show survivors that the other side of pain is recovery and growth. It

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explains what PTSD is and how it develops, gives hope for recovery, skills for managing overwhelming thoughts and feelings, information about treatment and resources.

Finally, you also asked about becoming a Sidran Speaker. Unfortunately, at this time we are no longer looking for speakers. I think it is admirable that you are interested in using your experiences to benefit others and would suggest looking into organizations in your local area. I am not sure of the nature of your experiences, so I am sorry I am not able to be more specific here, but perhaps you may have ideas.

Barron, I hope this information is useful and that you are able to find the help you are looking for.

The Sidran Institute Help Desk

The Sidran Institute is a nonprofit organization devoted to helping people who have experienced traumatic life events. The Sidran Help Desk provides information to those in need, because we know that locating a therapist who claims experience with your problem can be difficult. (Please read "What to Look for and How to Choose a Therapist"

<http://www.sidran.org/sub.cfm?contentID=62§ionid=4>) We have provided at no cost the following list of names of therapists in your area who claim to have trauma experience. This is a starting point to locating a therapist who meets your needs. We have not verified the credentials or experience of these therapists. Sidran is not responsible for the quality of services provided by the mental health care professionals. We highly recommend that you verify their credentials and experience before employing a therapist.

Employees, contractors, and volunteers who provide Help Desk information and resources have a variety of backgrounds and experiences. They are trained by Sidran to provide information and resources, however they do not provide clinical or counseling services. Please seek the guidance of a mental health professional for any of your needs beyond our stated purposes.

Exhibit # 1

(b) (2) (c) (1) (c) (2)

National Center for Post-Traumatic Stress Disorder, Department of Veterans Affairs

Coping with PTSD and Recommended Lifestyle Changes for PTSD Patients

A National Center for PTSD Fact Sheet

By Joe Ruzek, Ph.D.

Coping with PTSD

Because PTSD symptoms seldom disappear completely, it is usually a continuing challenge for survivors of trauma to cope with PTSD symptoms and the problems they cause. Survivors often learn through treatment how to cope more effectively.

Recovery from PTSD is an ongoing, daily, gradual process. It doesn't happen through sudden insight or "cure." Healing doesn't mean that a survivor will forget war experiences or have no emotional pain when remembering them. Some level of continuing reaction to memories is normal and reflects a normal body and mind. Recovery may lead to fewer reactions and reactions that are less intense. It may also lead to a greater ability to manage trauma-related emotions and to greater confidence in one's ability to cope.

When a trauma survivor takes direct action to cope with problems, he or she often gains a sense of personal power and control. Active coping means recognizing and accepting the impact of traumatic experiences and then taking concrete action to improve things.

Positive coping actions are those that help to reduce anxiety and lessen other distressing reactions. Positive coping actions also improve the situation in a way that does not harm the survivor further and in a way that lasts into the future. Positive coping methods include:

Learning about trauma and PTSD-It is useful for trauma survivors to learn more about PTSD and how it affects them. By learning that PTSD is common and that their problems are shared by hundreds of thousands of others, survivors recognize that they are not alone, weak, or crazy. When a survivor seeks treatment and learns to recognize and understand what upsets him or her, he or she is in a better position to cope with the symptoms of PTSD.

Talking to another person for support-When survivors are able to talk about their problems with others, something helpful often results. Of course, survivors must choose their support people carefully and clearly ask for what they need. With support from others, survivors may feel less alone, feel supported or understood, or receive concrete help with a problem situation. Often, it is best to talk to professional counselors about issues related to the traumatic experience itself; they are more likely than friends or family to understand trauma and its effects. It is also helpful to seek support from a support group. Being in a group with others who have PTSD may help reduce one's sense of isolation, rebuild trust in others, and provide an important opportunity to contribute to the recovery of other survivors of trauma.

Talking to your doctor about trauma and PTSD-Part of taking care of yourself means mobilizing the helping resources around you. Your doctor can take care of your physical health better if he or she knows about your PTSD, and doctors can often refer you to more specialized and expert help.

Practicing relaxation methods-These can include muscular relaxation exercises, breathing exercises, meditation, swimming, stretching, yoga, prayer, listening to quiet music, spending time

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in nature, and so on. While relaxation techniques can be helpful, they can sometimes increase distress by focusing attention on disturbing physical sensations or by reducing contact with the external environment. Be aware that while uncomfortable physical sensations may become more apparent when you are relaxed, in the long run, continuing with relaxation in a way that is tolerable (i.e., interspersed with music, walking, or other activities) helps reduce negative reactions to thoughts, feelings, and perceptions.

Increasing positive distracting activities-Positive recreational or work activities help distract a person from his or her memories and reactions. Artistic endeavors have also been a way for many trauma survivors to express their feelings in a positive, creative way. This can improve your mood, limit the harm caused by PTSD, and help you rebuild your life. It is important to emphasize that distraction alone is unlikely to facilitate recovery; active, direct coping with traumatic events and their impact is also important.

Calling a counselor for help-Sometimes PTSD symptoms worsen and ordinary efforts at coping don't seem to work. Survivors may feel fearful or depressed. At these times, it is important to reach out and telephone a counselor, who can help turn things around.

Taking prescribed medications to tackle PTSD-One tool that many with PTSD have found helpful is medication treatment. By taking medications, some survivors of trauma are able to improve their sleep, anxiety, irritability, anger, and urges to drink or use drugs.

Negative coping actions help to perpetuate problems. They may reduce distress immediately but short-circuit more permanent change. Some actions that may be immediately effective may also cause later problems, like smoking or drug use. These habits can become difficult to change. Negative coping methods can include isolation, use of drugs or alcohol, workaholicism, violent behavior, angry intimidation of others, unhealthy eating, and different types of self-destructive behavior (e.g., attempting suicide). Before learning more effective and healthy coping methods, most people with PTSD try to cope with their distress and other reactions in ways that lead to more problems. The following are negative coping actions:

Use of alcohol or drugs-This may help wash away memories, increase social confidence, or induce sleep, but it causes more problems than it cures. Using alcohol or drugs can create a dependence on alcohol, harm one's judgment, harm one's mental abilities, cause problems in relationships with family and friends, and sometimes place a person at risk for suicide, violence, or accidents.

Social isolation-By reducing contact with the outside world, a trauma survivor may avoid many situations that cause him or her to feel afraid, irritable, or angry. However, isolation will also cause major problems. It will result in the loss of social support, friendships, and intimacy. It may breed further depression and fear. Less participation in positive activities leads to fewer opportunities for positive emotions and achievements.

Anger-Like isolation, anger can get rid of many upsetting situations by keeping people away. However, it also keeps away positive connections and help, and it can gradually drive away the important people in a person's life. It may lead to job problems, marital or relationship problems, and the loss of friendships.

Continuous avoidance-If you avoid thinking about the trauma or if you avoid seeking help, you may keep distress at bay, but this behavior also prevents you from making progress in how you cope with trauma and its consequences.

Recommended Lifestyle Changes - Taking Control

Those with PTSD need to take active steps to deal with their PTSD symptoms. Often, these steps

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involve making a series of thoughtful changes in one's lifestyle to reduce symptoms and improve quality of life. Positive lifestyle changes include:

Calling about treatment and joining a PTSD support group-It may be difficult to take the first step and join a PTSD treatment group. Survivors say to themselves, "What will happen there? Nobody can help me anyway." In addition, people with PTSD find it hard to meet new people and trust them enough to open up. However, it can also be a great relief to feel that you have taken positive action. You may also be able to eventually develop a friendship with another survivor.

Increasing contact with other survivors of trauma-Other survivors of trauma are probably the best source of understanding and support. By joining a survivors organization (e.g., veterans may want to join a veteran's organization) or by otherwise increasing contact with other survivors, it is possible to reverse the process of isolation and distrust of others.

Reinvesting in personal relationships with family and friends-Most survivors of trauma have some kind of a relationship with a son or daughter, a wife or partner, or an old friend or work acquaintance. If you make the effort to reestablish or increase contact with that person, it can help you reconnect with others.

Changing neighborhoods-Survivors with PTSD usually feel that the world is a very dangerous place and that it is likely that they will be harmed again. It is not a good idea for people with PTSD to live in a high-crime area because it only makes those feelings worse and confirms their beliefs. If it is possible to move to a safer neighborhood, it is likely that fewer things will set off traumatic memories. This will allow the person to reconsider his or her personal beliefs about danger.

Refraining from alcohol and drug abuse-Many trauma survivors turn to alcohol and drugs to help them cope with PTSD. Although these substances may distract a person from his or her painful feelings and, therefore, may appear to help deal with symptoms, relying on alcohol and drugs always makes things worse in the end. These substances often hinder PTSD treatment and recovery. Rather than trying to beat an addiction by yourself, it is often easier to deal with addictions by joining a treatment program where you can be around others who are working on similar issues.

Starting an exercise program-It is important to see a doctor before starting to exercise. However, if the physician gives the OK, exercise in moderation can benefit those with PTSD. Walking, jogging, swimming, weight lifting, and other forms of exercise may reduce physical tension. They may distract the person from painful memories or worries and give him or her a break from difficult emotions. Perhaps most important, exercise can improve self-esteem and create feelings of personal control.

Starting to volunteer in the community-It is important to feel as though you are contributing to your community. When you are not working, you may not feel you have anything to offer others. One way survivors can reconnect with their communities is to volunteer. You can help with youth programs, medical services, literacy programs, community sporting activities, etc.

Related Fact Sheets

Managing stress

A brief guide to recognizing the symptoms of stress and managing traumatic stress

[Self care following disasters](#)

Answers questions about what people can do to cope with PTSD and where one can go to get help

[Discussing PTSD with your doctor](#)

A useful checklist to help discuss traumatic stress symptoms with primary care physicians

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For more information call the PTSD Information Line at (802) 296-6300 or send email to ncptsd@ncptsd.org. This page was last updated on Tue Feb 8 21:05:37 2005.

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Part 1

Authorization for Release of Information

If the State wishes to verify contents
of 1st - Third Class box systems of
Federal Trade Commission of Securities



STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS

GENERAL AUTHORIZATION TO RELEASE INFORMATION

Authorization is Hereby Granted To Court of Appeals, Superior Court of King County, Federal District Court, Supreme Court of Washington

Address Court of Appeals - Division 1 - One Union Square, 600 University Street Seattle, Washington, 98101-4170

To Release To Which Ever Court Stated Above & any Law Enforcement

Address N/A

The Following Information From My Records

check systems & the King County Sheriff's, that I had reported the Identity Theft to them even prior to the arrest of me on March 04 - 2006, & prior to arrest I was just waiting for mail to follow up & confirm my report

This Information Will Be Used As Follows

To prove my Innocence, to set the record straight on events leading up to my arrest, the Identity Theft Issue of 20+ years by a second uncle draining my funds from my account.

Name (Please Print) BARON N. HAGHIGATI Birthdate March, 22 1962 (B.N.H)

Date March 13, 2010

Witness _____

Baron N. Haghighati
Signature of Individual Authorizing Release of information

THIS AUTHORIZATION IS NOT VALID AFTER NINETY (90) DAYS FROM THE DATE OF THIS SIGNING.

The contents of this document may be eligible for public disclosure. Social Security Numbers are considered confidential information and will be redacted in the event of such a request. This form is governed by Executive Order 00-03, RCW 42.56, and RCW 40.14.

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Page #12

Saukewitch County Attorney
Mr. Jagutte

In response to this issue

2008 2 pages
63 of 91 pages



**SNOHOMISH COUNTY
PUBLIC DEFENDER ASSOCIATION**

1721 HEWITT AVENUE, SUITE 200
EVERETT, WASHINGTON 98201

PHONE (425) 339-6300 • FAX (425) 339-6363

September 5, 2009

Arnon N. Haghighi
DOC # 721125
Monroe Correctional Complex
Minimum Security Unit
P/O. Box 7001
16700 177th Ave. SE
Monroe, WA 98272

Dear Mr. Haghighi:

I received your letter dated September 30, 2009, and listened to your voice message.

I don't think that there is anything more we can do for you. Your appeal was denied by the Court of Appeals. The next step would be to seek discretionary review with the Supreme Court or file a collateral attack in either State or Federal courts. Unfortunately, you are not entitled to counsel to undertake these actions.

You are going to have to proceed on your own. If you file a collateral attach, you should ask the court for appointment of counsel.

It would be best to hire a lawyer to handle your case from here. There are a number of really good private lawyers. They may be able to advise you on whether there is any chance of success if you did proceed and if there is to represent you vigorously.

Here are some names and contact information:

- ① Lenell Nussbaum
2003 Western Ave., Suite 330
Seattle, WA 98140
- ② Suzanne Elliot
705 2nd Ave, Suite 1300
Seattle, WA 98104

> Please note, if you will consider taking my case, please send me a copy of this back to me on the original time & a copy for your file

Very truly yours,

Bill Jaquette
Bill Jaquette

Thank you

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Point #13.

King County Superior Court
Did not have to give me
an exceptional sentence could
have carried out the same
sentencing

B: Jaquette

FILED

MAY 19 2008

SONYA KRASKI
COUNTY CLERK
SNOHOMISH CO. WASH.

FILED
MAY 19 2008
SNO. CO. PUBLIC DEFENDER

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sent # 14

SUPERIOR COURT OF WASHINGTON
FOR SNOHOMISH COUNTY

THE STATE OF WASHINGTON,

06-1-00588-5

Plaintiff,

JUDGMENT AND SENTENCE

v.

Prison

HAGHIGHI, BARON NADDER

Jail One Year or Less

First Time Offender

Defendant.

Special Drug Offender Sentencing Alternative

Clerk's Action Required,

restraining order entered para. 4.3

SID: WA16830002

Clerk's action required

If no SID, use DOB: 03/22/1962

firearms rights revoked, para. 4.3 and 5.6

Clerk's action required, para 5.4, 5.3

Restitution Hearing set, Notice of Withholding

I. HEARING

1.1 A sentencing hearing was held and the defendant, the defendant's lawyer and the (deputy) prosecuting attorney were present.

II. FINDINGS

There being no reason why judgment should not be pronounced, the Court FINDS:

2.1 CURRENT OFFENSE(S): The defendant was found guilty on 5-15-08 by plea of:

COUNT	CRIME	RCW	INCIDENT #	DATE OF CRIME
I	First Degree Theft	9A.56.030(1)(a)	LYN, 0602125	02/12/06
II	First Degree Theft	9A.56.030(1)(a)		02/19/06

as charged in the information.

Additional current offenses are attached in Appendix 2.1.

A special verdict/finding for use of **adeadly weapon** which was a **firearm** was returned on Court(s) _____ RCW 9.94A.602, 9.41.010, 9.94A.533

A special verdict/finding for use of **deadly weapon** which was not a firearm was returned on Court(s) _____ RCW 9.94A.602, 9.94A.533

A special verdict/finding of **sexual motivation** was returned on Court(s) _____ RCW 9.94A.835.

A special verdict/finding for **Violation of the Uniform Controlled Substances Act** was returned on Court(s) _____, RCW 69.50.401 and RCW 69.50.435, taking place in a school, school bus, within 1000 feet of the perimeter of a school grounds or within 1000 feet of a school bus route stop designated by

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the school district; or in a public park, in a public transit vehicle, or in a public transit stop shelter.; or in, or within 1000 feet of the perimeter of, a civic center designated as a drug-free zone by a local government authority, or in a public housing project designated by a local governing authority as a drug-free zone.

[] A special verdict/finding that the defendant committed a crime involving the manufacture of methamphetamine, including its salts, isomers, and salts of isomers, **when a juvenile was present in or upon the premises of manufacture** was returned on Count(s) _____ RCW 9.94A.605, RCW 69.50.401(a), RCW 69.50.440.

[] The defendant was convicted of **vehicular homicide** which was proximately caused by a person driving a vehicle while under the influence of intoxicating liquor or drug or by the operation of a vehicle in a reckless manner and is therefore a violent offense. RCW 9.94A.030(45)

[] This case involves **kidnapping** in the first degree, kidnapping in the second degree, or unlawful imprisonment as defined in chapter 9A.40 RCW, where the victim is a minor and the offender is not the minor's parent. RCW 9A.44.130.

[] The court finds that the offender has a **chemical dependency** which contributed to the offense and imposes as a condition of sentence that defendant shall participate in the rehabilitative program/affirmative conduct:

RCW 9.94A.607.

[] The crime charged in Count(s) _____ involve(s) **domestic violence**.

[] The offense in Count(s) _____ was committed in a county jail or state correctional facility. RCW 9.94A.533(5)

[] The court finds that in Count _____ a motor vehicle was used in the commission of this felony. The Department of Licensing shall revoke the defendant's driver's license. RCW 46.20.285.

[] Current offenses encompassing the same criminal conduct and counting as one crime in determining the offender score are (RCW 9.94A.589):

[] Other current convictions listed under different cause numbers used in calculating the offender score are (list offense and cause number):

2.2 CRIMINAL HISTORY: Prior convictions constituting criminal history for purposes of calculating the offender score are (RCW 9.94A. 525):

CRIME	DATE OF SENTENCE	SENTENCING COURT (County & State)	DATE OF CRIME	A or J Adult, Juv.	TYPE OF CRIME
1 Nonsufficient Fund/ Checks (3 Counts-concurrent)	06/03/85	Orange Co, CA	06/03/85	A	C
2 Grand Theft/Property	01/28/88	Santa Barbara, CA	01/28/88	A	C
3 Unlawful Issuance of Bank check	05/26/94	Pierce Co, WA		A	C
4 Unlawful Issuance of Bank check	05/26/94	Pierce Co, WA		A	C
5 First Degree Theft (2 counts)	06/30/95	King Co, WA		A	B
6 Forgery (2 counts)	06/30/95	King Co, WA		A	C
7 Unlawful Issuance of Bank Check	11/01/96	King Co, WA		A	C
8 First Degree Theft	01/30/03	Snohomish Co, WA		A	B
9 Unlawful Issuance of Bank check (3 Counts)	01/30/03	Snohomish Co, WA		A	C
10 First Degree Theft	03/07/08	King Co, WA		A	B
11 Unlawful Issuance of Bank check (7 Counts)	03/07/08	King Co, WA		A	C

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- Additional criminal history is attached in Appendix 2.2.
- The defendant committed a current offense while on community placement or community custody (adds one point to score). RCW 9.94A.525.
- The court finds that the following prior convictions are one offense for purposes of determining the offender score (RCW 9.94A.525):
- The following prior convictions are not counted as points but as enhancements pursuant to RCW 46.61.520

2.3 SENTENCING DATA:

COUNT NO.	OFFENDER SCORE	SERIOUS LEVEL	STANDARD RANGE (not including enhancements)	PLUS ENHANCEMENTS	TOTAL STANDARD RANGE (including enhancements)	MAXIMUM TERM
I	21	II	43-57 months		43-57 months	10 years
II	21	II	43-57 months		43-57 months	10 years

*Firearm, (D) Other deadly weapons, (V) VUCSA in a protected zone, (VH) Veh. Hom, See RCW 46.61.520, (JP) Juvenile Present

- Additional current offense sentencing data is attached in Appendix 2.3.

2.4 **EXCEPTIONAL SENTENCE [For Determinate Sentence]**. Substantial and compelling reasons exist which justify an exceptional sentence above within below the standard range for Count(s)

The defendant and state stipulate that justice is best served by imposition of an exceptional sentence ~~above~~ ^{below} the standard range and the court finds that exceptional sentence furthers and is consistent with the interests of justice and the purposes of the sentence reform act.

Aggravating factors were stipulated by the defendant, found by the court after the defendant waived jury trial, found by jury by special interrogatory.

Findings of fact and conclusions of law are attached in Appendix 2.4. The jury's interrogatory is attached. The prosecuting attorney did did not recommend a similar sentence.

EXCEPTIONAL MINIMUM TERM [For Maximum and Minimum Term Sentence] Substantial and compelling reasons exist which justify an exceptional minimum term above within below the standard range for Count(s) _____. RCW 9.94A.712(3), 9.94A.535. Findings of fact and conclusions of law are attached in Appendix 2.4. The prosecuting attorney did did not recommend a similar sentence.

2.5 **ABILITY TO PAY LEGAL FINANCIAL OBLIGATIONS.** The court has considered the total amount owing, the defendant's past, present and future ability to pay legal financial obligations, including the defendant's financial resources and the likelihood that the defendant's status will change. The court finds that the defendant has the ability or likely future ability to pay the legal financial obligations imposed herein. RCW 9.94A.753, 10.01.160(3)

The following extraordinary circumstances exist that make restitution inappropriate (RCW 9.94A.753(5)):

2.6 The prosecutor's recommendation was _____ months/days on Count 1, _____ months/days on Count 2, _____ months/days on Count 3, _____ months/days on Count 4. The prosecutor recommended counts _____ run concurrently/consecutively.

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III. JUDGMENT

- 3.1 The defendant is GUILTY of the Counts and Charges listed in Paragraph 2.1 and Appendix 2.1.
- 3.2 The Court DISMISSES Counts _____
- 3.3 The defendant is found NOT GUILTY of Counts _____

IV. SENTENCE AND ORDER

IT IS ORDERED:

4.1 Defendant shall pay to the Clerk of this Court:

RMA	<u>\$15/\$25/\$50</u>	Restitution Monitoring Fee	SCC 4.94.010
		The Clerk shall collect this fee before collecting restitution or any other assessed legal financial obligations.	RCW 9.94A.760
PCV	<u>\$500</u>	Victim assessment	RCW 7.68.035
CRC	<u>\$ waived</u>	Court costs, including	RCW 9.94A.030, 9.94A.505, 10.01.160, 10.46.190
		Criminal filing fee \$ _____	FRC
		Witness costs \$ _____	WFR
		Sheriff service fees \$ _____	SFR/SFS/SFW/SRF
		Jury demand fee \$ _____	JFR
		Other \$ _____	
PUB	<u>\$962 waived</u>	Fees for court appointed attorney	RCW 9.94A.760
WFR	<u>\$</u>	Court appointed defense expert and other defense costs	RCW 9.94A.760
FCM	<u>\$</u>	Fine RCW 9A.20.021; <input type="checkbox"/> VUCSA additional fine deferred due to indigency	RCW 69.50.430
CDF/LDV	<u>\$</u>	Drug enforcement fund of _____	RCW 9.94A.760
FCD/NTF/SAD/SDI	<u>\$</u>		
CLF	<u>\$</u>	Crime lab fee <input type="checkbox"/> deferred due to indigency	RCW 43.43.690
EXT	<u>\$</u>	Extradition costs	RCW 9.94A.505
	<u>\$</u>	Emergency response costs (Vehicular Assault, Vehicular Homicide only, \$1000 maximum)	RCW 38.52.430
	<u>\$100</u>	Biological Sample Fee (for offenses committed after 7-1-2002)	RCW 43.43.7541
	<u>\$</u>	Domestic Violence Penalty (for offenses committed after 6-4-2004 - maximum \$100)	RCW 10.99.080
	<u>\$</u>	Other costs for: _____	
	<u>\$ 500.00</u>	TOTAL	RCW 9.94A.760

- The above total does not include all restitution or other legal financial obligations, which may be set by later order of the court. An agreed restitution order may be entered. RCW 9.94A.753.
- RESTITUTION. Schedule attached, Appendix 4.1.
- Restitution ordered above shall be paid jointly and severally with:

<u>NAME of other defendant</u>	<u>CAUSE NUMBER</u>	<u>(Victim name)</u>	<u>(Amount-\$)</u>
--------------------------------	---------------------	----------------------	--------------------

RJN

- The Department of Corrections (DOC) or clerk of the court shall immediately issue a Notice of Payroll Deduction. RCW 9.94A.7602, RCW 9.94A.760(8).

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All payments shall be made in accordance with the policies of the clerk and on a schedule established by the Department of Corrections, commencing immediately, unless the court specifically sets forth the rate here: Not less than

\$ 25.00 per month commencing 60 days from release
RCW 9.94A.760

All payments shall be made within 30 months of: release of confinement; entry of judgment; Other None

In addition to the other costs imposed herein the Court finds that the defendant has the means to pay for the cost of incarceration and is ordered to pay such costs at \$50.00 per day unless another rate is specified here _____ RCW 9.94A.760(2)

The defendant shall pay the costs of services to collect unpaid legal financial obligations. RCW 36.18.190.

The financial obligations imposed in this judgment shall bear interest from the date of the Judgment until payment in full, at the rate applicable to civil judgments. RCW 10.82.090. An award of costs on appeal against the defendant may be added to the total legal financial obligations. RCW 10.73.

4.2 HIV TESTING. The Health Department or designee shall test and counsel the defendant for HIV as soon as possible and the defendant shall fully cooperate in the testing. The defendant, if out of custody, shall report to the HIV/AIDS Program Office at 3020 Rucker, Suite 206, Everett, WA 98201 within one (1) hour of this order to arrange for the test. RCW 70.24.340

DNA TESTING. The defendant shall have a blood sample (offenses committed pre 7-1-2002) Biological sample (offenses committed 7-1-2002 and after) drawn for purposes of DNA identification analysis and the defendant shall fully cooperate in the testing. The appropriate agency, the county or Department of Corrections, shall be responsible for obtaining the sample prior to the defendant's release from confinement. RCW 43.43.754

4.3 The defendant shall not have contact with _____ (name, DOB) including, but not limited to, personal, verbal, telephonic, written or contact through a third party for _____ years (not to exceed the maximum statutory sentence). EVEN IF THE PERSON WHO THIS ORDER PROTECTS INVITES OR ALLOWS CONTACT, YOU CAN BE ARRESTED AND PROSECUTED. ONLY THE COURT CAN CHANGE THIS ORDER. YOU HAVE THE SOLE RESPONSIBILITY TO AVOID OR REFRAIN FROM VIOLATING THIS ORDER.

(Check for any domestic violence crime as defined by RCW 10.99.020(3)): VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE UNDER CHAPTER 26.50 RCW AND WILL SUBJECT A VIOLATOR TO ARREST. ANY ASSAULT, DRIVE-BY SHOOTING, OR RECKLESS ENDANGERMENT THAT IS A VIOLATION OF THIS ORDER IS A FELONY. RCW 10.99.050.

(Check for any harassment crime as defined by RCW 9A.46.060): VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE UNDER CHAPTER 9A.46 AND WILL SUBJECT A VIOLATOR TO ARREST. RCW 9A.46.080.

(For Domestic Violence orders only:) The clerk of the court shall forward a copy of this order on or before the next judicial day to the _____ County Sheriff's Office or _____ Police Department (where the protected person above-named lives), which shall enter it in a computer-based criminal intelligence system available in this state used by law enforcement to list outstanding warrants.

4.4 OTHER: _____

7506 9/1/02

4.5 CONFINEMENT OVER ONE YEAR.

CONFINEMENT [Determinate Sentences]. Defendant is sentenced to the following term of total confinement in the custody of the Department of Corrections (DOC):

_____ months on Count _____ months on Count _____
_____ months on Count _____ months on Count _____
_____ months on Count _____ months on Count _____

This is an exception sentence below the standard range. NO confinement is imposed but community custody is imposed.

CONFINEMENT [Maximum Term And Minimum Term]. Defendant is sentenced to total confinement as follows. The maximum and minimum terms of confinement shall be served in a facility or institution operated, or utilized under contract, by the State of Washington. RCW 9.94A.712

Count ____: maximum term of _____ years AND minimum term of _____ months
Count ____: maximum term of _____ years AND minimum term of _____ months
Count ____: maximum term of _____ years AND minimum term of _____ months
Count ____: maximum term of _____ years AND minimum term of _____ months

FURTHER PROVISIONS APPLICABLE TO ALL SENTENCES:

The minimum term of actual total confinement ordered on all counts cumulatively is _____.
(Add mandatory firearm and deadly weapon enhancement time to run consecutively to other counts. See Sec. 2.3, Sentence Data above.)

The maximum term of total confinement ordered on all counts cumulatively is _____.

All counts shall be served concurrently, except for the portion of those counts for which there is a special finding of a firearm or other deadly weapon, or sexual motivation, VUCSA in a protected zone, or manufacture of methamphetamine with juvenile present as set forth above at Section 2.3, and except for the following counts which shall be served consecutively: _____

The sentence herein shall run consecutively with the sentence in cause number(s) _____
but concurrently to any other felony cause not referred to in this Judgment. RCW 9.94A.589

Confinement shall commence immediately unless otherwise set forth here: _____

The defendant shall receive credit for time served prior to sentencing if that confinement was solely under this cause number. RCW 9.94A.505. The time served shall be computed by the jail unless the credit for time served prior to sentencing is specifically set forth by the court:

4.6 [] COMMUNITY PLACEMENT [For Determinate Sentences] is ordered as follows: Count _____ for _____ months; Count _____ for _____ months; Count _____ for _____ months.

COMMUNITY CUSTODY RANGE [For Determinate Sentences] is ordered as follows:
Count I for a range from 46 to 50 months;
Count II for a range from 46 to 50 months;
Count _____ for a range from _____ to _____ months;

or for the period of earned release awarded pursuant to RCW 9.94A.728(1) and (2), whichever is longer, and standard mandatory conditions are ordered. The combined term of community placement or community custody and confinement shall not exceed the statutory maximum. [See RCW 9.94A for community placement offenses -- serious violent offense, second degree assault, any crime against a person with a deadly weapon finding. Chapter 69.50 or 69.52 RCW offense. Community custody follows a term for a sex offense -- RCW 9.94A. Use paragraph 4.7 to impose community custody following work ethic camp.]

[] COMMUNITY CUSTODY [For Maximum And Minimum Term Sentences]: For each count, the defendant is sentenced to community custody under the supervision of the Department of Corrections (DOC) and the authority of the Indeterminate Sentence Review Board for any period of time that the defendant is released from total confinement before expiration of the maximum sentence. In addition to other conditions, the defendant shall comply with any conditions imposed by the Indeterminate Sentence Review Board under RCW 9.94A.713; 9.95.420, .425, .430, .435.

While on community placement or community custody, the defendant shall: (1) report to and be available for contact with the assigned community corrections officer as directed; (2) work at DOC-approved education, employment and/or community restitution; (3) not consume controlled substances except pursuant to lawfully issued prescriptions; (4) not unlawfully possess controlled substances while in community custody; (5) pay supervision fees as determined by DOC; and (6) perform affirmative acts necessary to monitor compliance with orders of the court as required by DOC (7) notify DOC of any change in the defendant's address or employment. The residence location and living arrangements are subject to the prior approval of DOC while in community placement or community custody. Community custody for sex offenders may be extended for up to statutory maximum term of the sentence. Violation of community custody imposed for a sex offense may result in additional confinement.

- [] The defendant shall not consume any alcohol.
- [] Defendant shall have no contact with: _____
- [] Defendant shall remain [] within [] outside of a specific geographical boundary, to wit: _____

The defendant shall participate in the following crime-related treatment or counseling services:

Defendant shall be evaluated for mental health condition and comply with treatment recommendations and comply with medications

The defendant shall undergo an evaluation for treatment for [] domestic violence [] alcohol abuse *AS* [] controlled substance abuse mental health [] anger management and fully comply with all *Directed* recommended treatment.

[] The defendant shall comply with the following crime-related prohibitions: _____

Other conditions may be imposed by the court or DOC during community custody, or are set forth here: _____

73 x 891 12/11/11

4.7 [] **WORK ETHIC CAMP**. RCW 9.94A.690, RCW 72.09.410. The court finds that the defendant is eligible and is likely to qualify for work ethic camp and the court recommends that the defendant serve the sentence at a work ethic camp. Upon completion of work ethic camp, the defendant shall be released on community custody for any remaining time of total confinement, subject to the conditions below. Violation of the conditions of community custody may result in a return to total confinement for the balance of the defendant's remaining time of total confinement. The conditions of community custody are stated above in Section 4.6.

4.8 **OFF LIMITS ORDER** (known drug trafficker) RCW 10.66.020. The following areas are off limits to the defendant while under the supervision of the County Jail or Department of Corrections:

4.9 Unless otherwise ordered, all conditions of this sentence shall remain in effect notwithstanding any appeal.

V. NOTICES AND SIGNATURES

5.1 COLLATERAL ATTACK ON JUDGMENT. Any petition or motion for collateral attack on this judgment and sentence, including but not limited to any personal restraint petition, state habeas corpus petition, motion to vacate judgment, motion to withdraw guilty plea, motion for new trial or motion to arrest judgment, must be filed within one year of the final judgment in this matter, except as provided for in RCW 10.73.100. RCW 10.73.090

5.2 LENGTH OF SUPERVISION. For an offense committed prior to July 1, 2000, the defendant shall remain under the court's jurisdiction and the supervision of the Department of Corrections for a period up to 10 years from the date of sentence or release from confinement, whichever is longer, to assure payment of all legal financial obligations unless the court extends the criminal judgment an additional 10 years. For an offense committed on or after July 1, 2000, the court shall retain jurisdiction over the offender, for the purposes of the offender's compliance with payment of the legal financial obligations, until the obligation is completely satisfied, regardless of the statutory maximum for the crime. RCW 9.94A.753(4); RCW 9.94A.760 and RCW 9.94A.505(5)

5.3 NOTICE OF INCOME-WITHHOLDING ACTION. If the court has not ordered an immediate notice of payroll deduction in paragraph 4.1, you are notified that the Department of Corrections may issue a notice of payroll deduction without notice to you if you are more than 30 days past due in monthly payments in an amount equal to or greater than the amount payable for one month. RCW 9.94A.7602. Other income-withholding action under RCW 9.94A may be taken without further notice. RCW 9.94A.7606.

5.4 RESTITUTION HEARING.
[X] Defendant waives any right to be present at any restitution hearing (sign initials): B N H
[] Defendant waives any right to a restitution hearing within 6 months RCW 9.94A.750.
[] A restitution hearing shall be set for _____
The Prosecutor shall provide a copy of the proposed restitution order and supporting affidavit(s) of victim(s) 21 judicial days prior to the date set for said restitution hearing. The defendant's presence at said restitution hearing may be excused only if a copy of the proposed restitution order is signed by both defendant and defense counsel and returned to the Court and Prosecutor no later than 10 judicial days prior to said hearing.

5.5 Any violation of this Judgment and Sentence is punishable by up to 60 days of confinement per violation. RCW 9.94A.634

5.6 FIREARMS. You may not own, use or possess any firearm unless your right to do so is restored by a court of record. (The court clerk shall forward a copy of the defendant's driver's license, identicard, or comparable identification, to the Department of Licensing along with the date of conviction or commitment). RCW 9.41.040, 9.41.047
If this is a crime enumerated in RCW 9.41.040 which makes you ineligible to possess a firearm, you must surrender any concealed pistol license at this time, if you have not already done so.
(Pursuant to RCW 9.41.047(1), the Judge shall read this section to the defendant in open court. The Clerk shall forward a copy of the defendant's driver's license, identicard, or comparable identification to the department of licensing along with the date of conviction).
[x] The defendant is ordered to forfeit any firearm he/she owns or possesses no later than _____ to _____ (name of law enforcement agency) RCW 9.41.098.

77-0891

Cross off if not applicable:

~~5.7 SEX AND KIDNAPPING OFFENDER REGISTRATION, RCW 9A.44.130, 10.01.200. Because this crime involves a sex offense or kidnapping offense (e.g., kidnapping in the first degree, kidnapping in the second degree, or unlawful imprisonment as defined in chapter 9A.40 RCW where the victim is a minor and you are not the minor's parent), you are required to register with the sheriff of the county of the state of Washington where you reside. If you are not a resident of Washington but you are a student in Washington or you are employed in Washington or you carry a vocation in Washington, you must register with the sheriff of the county of your school, place of employment, or vocation. You must register immediately upon being sentenced unless you are in custody, in which case you must register within 24 hours of your release.~~

~~_____ If you leave the state following your sentencing or release from custody but later move back to Washington, you must register within 3 days after moving to this state or within 24 hours after doing so if you are under the jurisdiction of this state's Department of Corrections. If you leave this state following your sentencing or release from custody but later while not a resident of Washington you become employed in Washington, carry out a vocation in Washington, or attend school in Washington, you must register within 3 days after starting school in this state or becoming employed or carrying out a vocation in this state, or within 24 hours after doing so if you are under the jurisdiction of this State's Department of Corrections.~~

~~_____ If you change your residence within a county, you must send signed written notice of your change of residence to the sheriff within 72 hours of moving. If you change your residence to a new county within this state, you must send signed written notice of your change of residence to the sheriff of your new county of residence at least 14 days before moving, register with that sheriff within 24 hours of moving and you must give signed written notice of your change of address to the sheriff of the county where last registered within 10 days of moving. If you move out of Washington State, you must also send written notice within 10 days of moving to the county sheriff with whom you last registered in Washington State.~~

~~_____ If you are a resident of Washington and you are admitted to a public or private institution of higher education, you are required to notify the sheriff of the county of your residence of your intent to attend the institution within 10 days of enrolling or by the first business day after arriving at the institution, whichever is earlier.~~

~~_____ Even if you lack a fixed residence, you are required to register. Registration must occur within 24 hours of release in the county where you are being supervised if you do not have a residence at the time of your release from custody or within 14 days after ceasing to have a fixed residence. If you enter a different county and stay there for more than 24 hours, you will be required to register in the new county. You must also report in person to the sheriff of the county where you are registered on a weekly basis if you have been classified as a risk level II or III, or on a monthly basis if you have been classified as a risk level I. The lack of a fixed residence is a factor that may be considered in determining a sex offender's risk level.~~

~~_____ If you move to another state, or if you work, carry on a vocation, or attend school in another state you must register a new address, fingerprints, and photograph with the new state within 10 days after establishing residence, or after beginning to work, carry on a vocation, or attend school in the new state. You must also send written notice within 10 days of moving to the new state or to a foreign country to the county sheriff with whom you last registered in Washington State.~~

~~_____ If you have a fixed residence and you are designated as a risk level II or III, you must report, in person, every 90 days to the sheriff of the county where you are registered. Reporting shall be on a day specified by the county sheriff's office, and shall occur during normal business hours. If you comply with the 90-day reporting requirement with no violations for at least 5 years in the community, you may petition the superior court to be relieved of the duty to report every 90 days.~~

~~_____ If you apply for a name change, you must submit a copy of the application to the county sheriff of the county of your residence and to the state patrol not fewer than five days before the entry of an order granting the name change. If you receive an order changing your name, you must submit a copy of the order to the county sheriff of the county of your residence and to the state patrol within five days of the entry of the order. RCW 9A.44.130(7).~~

21 of 91 pages

IDENTIFICATION OF DEFENDANT

SID No. WA16830002
(If no SID take fingerprint card for State Patrol)

Date of Birth: 03/22/1962

FBI No. 51342AA8

Local ID No:

PCN No. _____

DOC : 721125

Alias name, SSN, DOB: NADDER BARON HAGHIGHI March 22 1962,

Race: White

Ethnicity:
 Hispanic
 Non-Hispanic

Sex: M

Height: 5'10

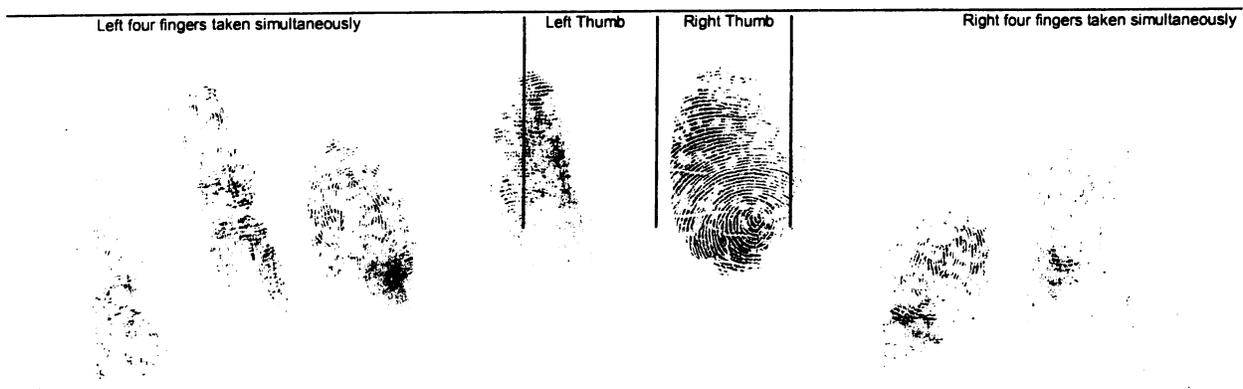
Weight: 190

Hair: Black

Eyes: Brown

FINGERPRINTS I attest that I saw the same defendant who appeared in Court on this document affix his or her fingerprints and signature thereto. Clerk of the Court: [Signature], Deputy Clerk.
Dated: 5-19-08

DEFENDANT'S SIGNATURE: [Signature]
ADDRESS: _____



2006-911

Cross off if not applicable:

5.8 **RIGHT TO APPEAL.** If you plead not guilty, you have a right to appeal this conviction. If the sentence imposed was outside of the standard sentencing range, you also have a right to appeal the sentence.

This right must be exercised by filing a notice of appeal with the clerk of this court within 30 days from today. If a notice of appeal is not filed within this time, the right to appeal is IRREVOCABLY WAIVED.

If you are without counsel, the clerk will supply you with an appeal form on your request, and will file the form when you complete it.

If you are unable to pay the costs of the appeal, the court will appoint counsel to represent you, and the portions of the record necessary for the appeal will be prepared at public expense.

5.9 Voting Rights Statement: I acknowledge that my right to vote has been lost due to felony conviction. If I am registered to vote, my voter registration will be cancelled. My right to vote may be restored by: a) A certificate of discharge issued by the sentencing court, RCW 9.94A.637; b) A court order issued by the sentencing court restoring the right, RCW 9.92.066; c) A final order of discharge issued by the indeterminate sentence review board, RCW 9.96.050; or d) A certificate of restoration issued by the governor, RCW 9.96.020. Voting before the right is restored is a class C felony, RCW 92A.84.660.

5.10 OTHER: _____

DONE in Open Court and in the presence of the defendant this date: 5-19-08

Arilda C. New

 JUDGE
 Print name:

[Signature]

 COLEEN D. ST. CLAIR, #17562
 Deputy Prosecuting Attorney

[Signature] 8460

 WILLIAM A. JAQUETTE, #8460
 Attorney for Defendant

[Signature]

 BARON NADDER HAGHIGHI
 Defendant

Interpreter signature/Print name: _____
 I am a certified interpreter of, or the court has found me otherwise qualified to interpret, the _____ language, which the defendant understands. I translated this Judgment and Sentence for the defendant into that language.
 CAUSE NUMBER of this case: _____

I, Sonya Kraski, Clerk of this Court, certify that the foregoing is a full, true and correct copy of the Judgment and Sentence in the above-entitled action, now on record in this office.

WITNESS my hand and seal of the said Superior Court affixed this date: _____
 Clerk of said County and State, _____, Deputy Clerk

2206 PD 10/27

ORDER OF COMMITMENT

THE STATE OF WASHINGTON to the Sheriff of the County of Snohomish; State of Washington, and to the Secretary of the Department of Corrections, and the Superintendent of the Washington Corrections Center of the State of Washington, GREETINGS:

WHEREAS, BARON NADDER HAGHIGHI, has been duly convicted of the crime(s) of Count 1 First Degree Theft, Count 2 First Degree Theft, as charged in the Information filed in the Superior Court of the State of Washington, in and for the County of Snohomish, and judgment has been pronounced against him/her that he/she be punished therefore by imprisonment in such correctional institution under the supervision of the Department of Corrections, Division of Prisons, as shall be designated by the Secretary of the Department of Corrections pursuant to RCW 72.02.210, for the term(s) as provided in the judgment which is incorporated by reference, all of which appears of record in this court; a certified copy of said judgment being endorsed hereon and made a part thereof, Now, Therefore,

THIS IS TO COMMAND YOU, the said Sheriff, to detain the said defendant until called for by the officer authorized to conduct him to the Washington Corrections Center at Shelton, Washington, in Mason County, and this is to command you, the said Superintendent and Officers in charge of said Washington Corrections Center to receive from the said officers the said defendant for confinement, classification, and placement in such corrections facilities under the supervision of the Department of Corrections, Division of Prisons, as shall be designated by the Secretary of the Department of Corrections.

And these presents shall be authority for the same. HEREIN FAIL NOT.

WITNESS the Honorable LINDA C. KRESE, Judge of the said Superior Court and the seal thereof, this 19th day of May, 2008.

Sonya Kraski
CLERK OF THE SUPERIOR COURT

By: [Signature]
Deputy Clerk

83 of pages

SUPERIOR COURT OF WASHINGTON
FOR SNOHOMISH COUNTY

THE STATE OF WASHINGTON,

Plaintiff,

v.

HAGHIGHI, BARON NADDER

Defendant.

No. 06-1-00588-5

FINDINGS OF FACT AND CONCLUSIONS OF LAW
FOR AN EXCEPTIONAL SENTENCE

APPENDIX 2.4 JUDGMENT AND SENTENCE

SID: WA16830002
If no SID, use DOB: 03/22/1962

An exceptional sentence [] above [] within below the standard range should be imposed based upon the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

- The parties stipulate and agree that substantial and compelling reasons exist for an exceptional sentence below the standard range imposing no confinement but imposing a term of community custody with mental health conditions and that such a sentence is consistent with the policies of the SRA
- A standard range sentence of confinement would result in imposition of no additional time for defendant who is serving a prison term of 96 months
- Defendant has significant mental health issues which contribute to his criminal behavior
- A term of community custody with mental health conditions is consistent with provisions of the SRA urging appropriate treatment for offenders.

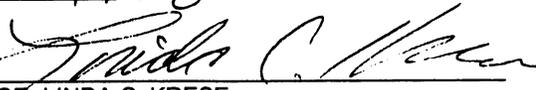
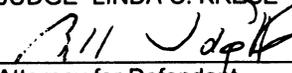
II. CONCLUSIONS OF LAW

- Imposition of an exceptional sentence imposing no prison range but a substantial period at community custody with mental health conditions is consistent with provisions of the SRA
- The parties stipulate to imposition of an exceptional sentence and imposition of this sentence is consistent w/ provisions of SRA
- Substantial and compelling reasons exist for imposition of an exceptional sentence.

Dated: 5-19-09


 Deputy Prosecuting Attorney
 COLEEN D. ST. CLAIR


 Defendant
 BARON NADDER HAGHIGHI


 JUDGE LINDA C. KRESE

 Attorney for Defendant
 WILLIAM A. JAQUETTE

87-670 P. 2/10

SUPERIOR COURT FOR THE STATE OF WASHINGTON
COUNTY OF King

State of Washington)
Plaintiff)
)
v.)
BARON N. HAGHIGHI)
Defendant)

No. 06-1-10032-4 knf
MOTION TO DOCKET

TO THE CLERK OF THE SUPERIOR COURT:

NAME MAN DONNO LEAN WISE WSB# NIP
ADDRESS 516 3d Ave. WSS4 King County Court House ATTORNEY FOR State
Seattle Washington PHONE NIP
(Please note additional attorneys on an attached page) 28104-2385

Please take notice that the undersigned will bring on for hearing a motion for:

To reconsider the exceptional sentence based on
new evidence not available & not provided by my

The hearing is requested to be held during the regular motion calendar on: Defense Counsel

Also Enlight of recent Court of Appeals order date of 10/17

DATE AND TIME REQUESTED FOR HEARING MOTION (S)
Depending on Court availability. However as soon as possible

Nature of the Case: UIC - Theft #1

Dated: 2009 Signed: [Signature]

NAME BARON N. HAGHIGHI DOC# 721125
ADDRESS [Redacted] Unit [Redacted], Cell [Redacted]
516 3d Ave WSS4 PHONE _____

THE ABOVE INFORMATION MUST BE COMPLETED AND SIGNED

MONROE CORRECTIONAL COMPLEX
MINIMUM SECURITY UNIT
PO BOX 7001 D-319L
16700 177TH AVE SE
MONROE WA 98272

30 out (91) Page

Print #16

3 holes Issues with California Cases
All moot

All cases were closed Satisfactorily.

23

8706 (9)

Received Sept 02 2008

Twin Rivers Corrections Center
P.O. Box 888
Monroe, WA 98272-0888

Exhibit

SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE

JUSTICE CENTER:

- Central - 700 Civic Center Dr. West, Santa Ana, CA 92701-4045
- Civil Complex Center - 751 W. Santa Ana Blvd., Santa Ana, CA 92701-4512
- Harbor-Laguna Hills Facility - 23141 Moulton Pkwy., Laguna Hills, CA 92653-1251
- Harbor-Laguna Niguel Facility - 30143 Crown Valley Parkway, Laguna Niguel, CA 92677-2089
- Harbor-Newport Beach Facility - 4601 Jamboree Rd., Newport Beach, CA 92660-2595
- Lamoreaux - 341 The City Drive, Orange, CA 92868-3205
- North - 1275 N. Berkeley Ave., P. O. Box 5000, Fullerton, CA 92838-0500
- West - 8141 13th Street, Westminster, CA 92683-4593

ORIGINAL

COPY

RECORD SEARCH INFORMATION

Legal Mail

AND CERTIFICATION

Your request for a search of court records for: Unlimited Civil Limited Civil Small Claims Family Law Probate Juvenile Traffic Criminal has been completed for the above marked Justice Center. Unless otherwise indicated below, all databases and indexes were searched and produced the following information:

Name: Baron N. Haghighi DOB: 03/22/1962 CA Driver's License: _____

Records search for: _____ through _____.

No record(s) found.

The records you are requesting have been destroyed in accordance with Government Code §68152.

The following court records have been found:

FILE/VIOLATION/ISSUE DATE	CASE NUMBER	SHORT TITLE OR CHARGE(S)

See attachment for additional court records.

Search Fee Paid \$ _____

Certification Fee Paid \$ _____

ALAN SLATER, Clerk of the Court

Date: August 28, 2008

By: K. Nordin-Morales
DEPUTY CLERK

CLERK'S CERTIFICATION

I certify the foregoing information is a true and correct finding of the records searched as listed above.



Date: August 28, 2008

ALAN SLATER, Clerk of the Court
By: [Signature]
DEPUTY CLERK

Court Use Only
L1209 (Rev. January 1, 2006)

RECORD SEARCH INFORMATION

For access to Traffic, Criminal and Civil case information online, please visit www.occourts.org and click on the Case link.

3526 91 Page
Exhibit #2

ORIGINAL

**Santa Barbara Superior Court
Criminal Division
118 E. Figueroa Street
Santa Barbara, CA 93101
(805) 568-2778**

*Received
08-29-08
All contents of this package
referred to Hon Judge
Gair
09-03-08
Mr Hummelton
Mr Arizon
Mr Jaquette
Mr Jaystrom
Hon Judge Linda Lores
Pres. Colleen St. Claire*

Twin Rivers Corrections Center
P.O. Box 888
Monroe, WA 98272-0888

Legal Mail

Case No.: 168632

Date: 8/26/08

THESE DOCUMENTS ARE BEING RETURNED FOR THE FOLLOWING REASONS:

- Incorrect case number/No case number. If a case number is unknown, a record search can be done for a \$15.00 search fee per GC 70627 (c) if applicable.. Please submit request in writing along with check or money order made out to "Clerk of the Court."
- Incorrect funds. Please send a check for \$_____.
- Documents filed in incorrect court.
- Documents are not signed. Please sign and return.
- Documents are not complete. Please amend and return.
- The Court cannot alter/amend documents. Please amend and return.
- We cannot give legal advice. Please contact an attorney.
- Please include a self addressed stamped envelope with proper postage.
- Other: We are sorry to inform you that we have no record of this case number.

COPY

(please review attached documents)

YOUR REQUEST WILL BE PROCESSED UPON RECEIPT OF THE ABOVE CHECKED INFORMATION AND/OR FEES.
THANK YOU.

Johanne Calfo
Deputy Clerk

39 of 91 pages

Page 717

Discrepancy Calculations of 1911

Time with out

Courts ruling on (equality

of Inequitable

Evidence

§ Various other

Certificates & Memoranda

Attended Copies Provided

Upon Courts Request

12

Ad (9) Regu

~~Washington Corrections Center
Pasco, WA 99301
Main: WA 982 722 2888~~

Exh. b, f
2



WASHINGTON CORRECTIONS CENTER
MEMORANDUM

TO: 721125

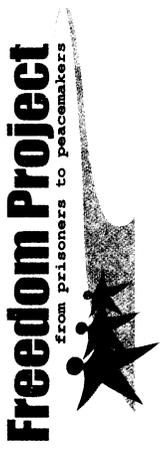
1. You were sentenced to a total of 96 months. The county awarded you with 997 days of jail time credits.
2. Your tentative release date is 6/14/12. Max. 2/12/15
3. Your custody level is Min.
4. You requested placement at TRV / MICE. Headquarters will make a final decision on your placement. You will receive written notice from Headquarters regarding your placement. If you wish to appeal, send a written notice to: Jean Stewart, Chief of Classification 7345 Linderson Way S.W. Tumwater, WA 98501.
5. You will remain here until called out for your next placement.

Exhibit To
be sent to
Gabbert
to the
57 volume

Mailed 07-01-08

made a letter
to m Stewart
06-29-08

3



CONFIRMATION OF ATTENDANCE

PRESENTED TO

Brian Haggins

In recognition of participation in and completion of

12 hours of training in the workshop

Conflict Resolution

(Workshop Title)

In Moore, Wyo

(City/State)

7702
Trainer

11/21/05
Date

MR. C. ...
Trainer

11/21/05
Date