

COURT OF APPEALS  
DIVISION TWO  
OF THE STATE OF WASHINGTON

FILED  
COURT OF APPEALS  
DIVISION II

STATE OF WASHINGTON )  
 )  
 Respondent, )  
 )  
 v. )  
 )  
 WILLIAM KIPP, )  
 )  
 Appellant. )

10 APR 15 PM 1:43

STATE OF WASHINGTON

No. 39750-1-II

BY [Signature]  
DEPUTY

STATEMENT OF ADDITIONAL  
GROUNDS FOR REVIEW

I, WILLIAM JOHN KIPP JR., have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

THE JUDGE HAD A BIAS AGAINST ME. FROM THE VERY START THE JUDGE DID EVERYTHING IN HER POWER TO STACK THE TRIAL AGAINST ME. SHE ALLOWED THE TRIAL TO CONTINUE EVEN THOUGH THE ACCUSERS STORIES CHANGED WITH EVERY INTERVIEW. THE PROSECUTOR WAS CONDUCTING HERSELF ILLEGALLY AND WAS JUST GIVEN A WARNING TO RE-EVALUATE HER PRACTICES. THE JUDGE ALLOWED A TAPE OF A PRIVATE CONVERSATION BETWEEN MY

Additional Ground 2

THE PROSECUTOR'S CLOSING REMARKS. THE PROSECUTOR TOLD THE JURY THAT ALL THEY HAD TO DO WAS BELIEVE THAT I COULD HAVE, MIGHT HAVE, POSSIBLY COMMITTED THE CRIME ANY TIME THAT I WAS HOME. SHE DIDNT SAY ANYTHING ABOUT PROOF OR PROOF BEYOND A SHADOW OF A DOUBT.

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

Date: April 9, 2010

Signature: [Signature]

## Additional Ground 1 (Cont.)

BROTHER-IN-LAW AND MYSELF THAT WAS MADE IN A PRIVATE HOUSE WITHOUT MY KNOWLEDGE. THE JUDGE DID NOT ALLOW MY NEIGHBOR TO BE A WITNESS THAT COULD HAVE TESTIFY TO HOW OFTEN I WAS HOME, IF THE ACCUSERS EVER STAYED AT MY HOUSE WHEN I WAS HOME, AND TO THE FACT I WAS OUT AT SEA DURING THE SUMMERS. SHE DID NOT ALLOW MY BROTHER-IN-LAW TO BE A WITNESS WHEN HE RETURNED FROM BEING OUT AT SEA, EVEN THOUGH HE LIVED WITH ME DURING THE TIME OF THE ALLEGATIONS. THE JUDGE ALSO DID NOT ALLOW ANY WITNESSES ON MY BEHALF TO TESTIFY ABOUT MY CHARACTER BUT ALLOWED A WITNESS AGAINST ME. THEN DURING JURY SELECTION, SHE DISMISSED ANYONE WHO SAID THE STATE HAD TO PROVE I COMMITTED THE CHARGES AND TRIED TO KEEP ONE THAT SAID I WAS GUILTY JUST FOR BEING ACCUSED. DURING THE TRIAL, THE JUDGE LIMITED ME TO WHAT I COULD SAY, NOT ALLOWING ME TO TELL THE WHOLE TRUTH. WHEN MY LAWYER TRIED TO POINT OUT THE STORIES OF THE ACCUSERS CHANGED EVERY TIME THEY TOLD IT, THE JUDGE SAID IT DID NOT MATTER, JUST WHAT THEY SAY ON THE STAND AND NOT ALLOWING MY LAWYER TO ESTABLISH THEIR LIES. DURING THE CLOSING STATEMENT BY THE PROSECUTOR, THE JUDGE DID NOT CORRECT HER AND LET THE JURY GO INTO DELIBERATION WITH THE FINAL THOUGHT OF NOT NEEDING PROOF. LASTLY, WHEN I WAS BEING BOOKED, THE TWO COPS THAT BOOKED ME, ASKED WHO MY JUDGE WAS AND THEN THEY TOLD ME SHE HATES PEOPLE IN THE MILITARY.

