

CERTIFICATE OF SERVICE

I certify that I mailed

1 copies of SAG
to App. Counsel Salt
& Pierce Co. Prob. Office
8/7/12 cm
Date Signed

FILED
COURT OF APPEALS
DIVISION II
2012 AUG -6 AM 9:20
STATE OF WASHINGTON
BY Ca
DEPUTY

COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION II

STATE OF WASHINGTON,)
)
) Respondent,)
)
v.)
) Robert, Hill,)
)
) Appellant.)

43046-1

No. ~~40436-1 (2)~~
Pierce Sup. Ct. # 11-1-03777-2

STATEMENT OF ADDITIONAL
GROUND FOR REVIEW
RAP 10 10

I, Robert Hill, 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

- ★ 1 INCOMPETENT PUBLIC DEFENDER ★
- A) Failed to subpoena, or find, critical jail witness "Dominic Jaber" of Sent. Eighth, 2011
- B) Failed to subpoena, or interview, T.M.C. judicial assistant "Irene Haugden" of Sent. Ninth, 2011.
- C) Failed to ask Commissioner Hansen fact questions about his grandchild's father (Dominic Jaber)

Additional Ground 2

A) In December of 2011, I met with Robert Quillian, contract "conflict" attorney hired by O.A.C., and told him

Hill

how I got this name of Commissioner Randall Hansen's daughter "JODIE" from a Pierce County jail inmate with whom I was being released after posting bail. I was in '2A' and thought this guy was from '2B' because he was already in the start, shared pre-exit secure hallway before I got called. He looks at my yellow carbon copies of my ~~Additional Grounds~~ T.M.C. court case and initiates

conversation about Hansen, mentioning having a kid with "JODIE" the daughter; and shows me a tattoo of the name on his right shoulder. I thought this coincidence was rather unique. One week before trial Quillian & I meet to prepare, and I ask if he's found the guy from jail. He says, "How do you expect to find someone less than a week before trial?" He does preliminary work with the jail and gets a dozen names; then it's narrowed

~~Additional Grounds~~ to one, which he shows me as "Dominique Jaber." In March my family hired Russell Herman, a private investigator (with H.I.T.S.) who finds contact info for "Dominic Jaber," but fails to talk or meet with him or get a photo of the tattoo. Two weeks ago we hired Michael C. ^(with C&A) who is contemporaneously attempting to obtain this documentation. In June I obtained a 3-page printout from Capt. Brent Bankamp of the Sheriff's Dept. showing "Sept. 8th, 2011 - 2A Housing" and it showed Jaber

in bunk 7 and me in 35 (or vice versa). I got this document in less than ten days. My defender was incompetent in failed to subpoena this significant witness or appreciate the significance of the source of the name. Judge Culpepper expressly stated he didn't believe my story of the coincidence of meeting the jail inmate; and the Taroma News Tribune

also published a Feb. Fourth²⁰¹² story including Culpeper's statement(s). My theory of defense was compromised by the absence of Dominic Jaber. [SUPPLEMENTAL REPORT]
B) Eric Furer completed his Handwritten Statement two months after the incident, which was observed by Irene Hansden, the J.A. for Judge Ladoburg. Furer falsely stated the sexual content being part of my Sept. Ninth visit. This "non-mentioning" was observed by Hansden and could have rebutted Furer's claim had she been subpoenaed to do this by Quillian.

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

THURSDAY

Date: August, Second, A.D. 2012 Signature: ★ M. R. H. ★
cross-examine

- c) Quillian failed to ask Commissioner Hansen, on the stand, whom he believed was the father of his grand-daughter. This answer would have corroborated the finding of "Jaber" thru jail records. It may be possible to do "research on the Internet" over the weekend, as Culpeper stated, on the mother's side of the baby's family, but I can't make up details, also, of the "Father" and the Father's side!!

★ note: Supplemental Reports by either private investigators (M.I.P.S.)
• Russell Herman and/or
• Michael Crockett (CIA)
are going to be filed separately.

☆ 2 Inadmissibility of "telephone conversation" recordings ☆
discs.

Whether or not the three Transcripts were authentreated, and whether or not Eric Furr and/or Sgt. Villaherme "identified" the voice/sounds played from the CDs as from the Defendant, none of the alleged Creators of the discs materialized in court to testify as to their genesis: ① Derek Young and ② The lady. Neither submitted notarized documents purporting that they created and "burned" the CDs. Thus, there was no authentication of the Ultimate Source of the transcripts, in violation of EIR 901.^{§1003} Just because Derek Young or the woman hand a CD to somebody, especially law enforcement, doesn't mean they created the content illegally findable or usable on the CD. Furthermore, the author or creator of the three transcripts has never been identified. One significant fact not known, therefore, is if the spelling of Jodie Hansen's first name is "J-O-D-I" or "J-O-D-I-E". How likely is it that the statement of Dominic Jaber (the man I was released with on Sept. 8th, 2011) was making up the story on having a kid with the daughter of Commissioner Hansen, and was telling me this story as some sort of inside joke. All three CDs must be thrown out as Exhibits and Evidence. There is no evidence declaring what alleged phone number was used, either; how were obtained?

Thursday, August 9th
2012

FROM → The Hon. Mr. Robert, Hill
2522 North Prairie ST, #277
984 00-9999

TO → Crick, Melba, & Cooper, Patrick

RE: NR-1-03777-2

I hereby give notice of filing my Statement of Additional Circumstances for review by the Court of Appeals

Furthermore, I give notice of filing of my First Supplement to the S.A.C.

Furthermore, I give notice ⁱⁿ ~~of~~ ^{intent for} filing in the near future of filing a Second Supplement to the S.A.C., to contain three pages of the jail-roster printout for September-Eighth, 2011 for unit '2A'.