

COA NO. 44077-6-II

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

STATE OF WASHINGTON,

Respondent,

v.

TYSON MAXWELL,

Appellant,

BY  STATE OF WASHINGTON
DEPUTY

2013 AUG 22 PM 2:43

FILED
COURT OF APPEALS
DIVISION II

AMENDED STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

REGINALD BELL, SR.,
in and on the behalf of:

TYSON MAXWELL
Coyote Ridge Correction Center
PO Box 769
Connell WA. 99328

Summarized below are the additional grounds for review ~~that~~ not addressed in the appellates opening or amended briefs.

ADDITIONAL GROUND I

THE EVIDENCE IS INSUFFICIENT TO SUPPORT THE
CONVICTIONS FOR UNLAWFUL POSSESSION WITH
INTENT TO DELIVER

The State also failed to prove Maxwell was guilty of the crime of ~~an~~ unlawful possession of a controlled substance with intent to deliver either as a complice or a principle because possession element of the crime was not proven beyond a reasonable doubt. The evidence is insufficient to show Maxwell was guilty as an accomplice the evidence does not establish he knowingly aided Banek in committing these crimes.

Maxwell incorporates as referenmce statement of facts and legal argument on pages 2 through 17 because it applies with equal force to these crimes.³

³: Mr. Maxwell refers to the amended brief of appellant and the argument contained therein pertaining to the firearm conviction

Dated August 15, 2013
Tyson Maxwell
Tyson Maxwell