

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON)
)
Respondent,)
)
v.)
)
Michael Scott Norris)
(your name))
)
Appellant.)

No. 43927-1-II

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

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BY [Signature]

I, Michael S. Norris, 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

Judge John P. Wulle should have recused himself from this case which has "homosexual" components as he was censured for his vocal & obvious prejudice towards people of this persuasion. Judge Wulle was also quoted in his censure case as having participated in "running fags out of his city" and even having a nickname for this activity, he and others called it "Covving" someone. This shows clear bias towards the defendant & his case.

Additional Ground 2

The "Stipulation of Facts" agreement was signed without the defendant's being able to "vet" the agreement at the Federal level with the representation of Federal Counsel. As this agreement was at least one-half Federal a federal public defender should have been consulted before the signing was completed.

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

Date: 4/22/2013

Signature: [Signature]

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Additional Ground 3

The defendant's attorney Clayton Spencer allowed the defendant to sign the "Stipulation of Facts" agreement even though he was aware of the defendant's attempted suicide and fragile mental state (severe depression). Further the attorney of record participated in an unethical meeting with the prosecutor Alan Harvey, the district attorney Todd Collick, and Judge John P. Wulle for the expressed purpose of obtaining the Judge's willingness to keep to the sentence agreed to by the parties. The defendant was told by his counsel that the court had agreed to abide by the agreement before the agreement was signed or entered into the record. This is a clear violation of the ethical standards of the court.

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Additional Ground 4

There is a clear pattern, throughout the nearly five years that this case was in Judge Wulle's court, of legal and civil rights violations. As recognized by the Appellate Court in its Judicial Review of this case the prosecution was allowed by Judge Wulle to violate the defendant's speedy-trial rights by at least 18 months, evidentiary rights by transferring evidence out of his custody directly before it was ruled he must turn such evidence over to the defense, and committed prosecutorial misconduct by entering recorded phone calls into the court record that had no "probative" value but were meant to incite the anger of the court due to their content. The Court never addressed nor took any corrective actions in regards to these violations.

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Additional Ground 5

Taken in their totality, the defendant's counsel of record, Clayton Spencer's actions constitute ineffective assistance of counsel. First by allowing a meeting to take place with Judge Wulle, Alan Harvey, and Tony Gallick who's expressed purpose was to get the court's unethical commitment to a sentence range before the defendant even pled guilty. Secondly, the "Stipulation of Facts" agreement was directly in opposition to the defendant's interests by allowing the "signing-away" of all future rights, and further, before said agreement had been vetted at the Federal level with Federal Counsel's involvement. Finally, the defendant's attorney allowed the "Stipulation of Facts" agreement to be signed knowing that the defendant was emotionally and mentally compromised due to severe depression that was causing suicidal ideation/actions.

A copy of these "Statements of Additional Grounds for Review" was mailed to the offices of Nielsen, Broman & Koch P.L.L.C., 1908 E. Madison St, Seattle, WA 98122, on 4/24/2013.

Michael A. Nielsen