

To Whom it may concern, This is
a partial Additional Grounds
statement. I asked for a extension
of time to get information
on my Criminal history. I have
not heard back from the records
dept. or from the appeal court
as to if my extension was
granted.

Thank you

Robert M. Johnson

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APR 20 2015

CLERK OF COURT OF APPEALS DIV-II
STATE OF WASHINGTON

Court of Appeals
Division Two
of the State of Washington

State of Washington
Respondent

v.

Robert B. Falconer Jr
Appellant

No. 46707-1-II

Statement of
additional Grounds
for Review

FILED
COURT OF APPEALS
DIVISION II
2015 APR 20 PM 1:31
STATE OF WASHINGTON
DEPUTY

I, Robert B. Falconer have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in the 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

Appellant Falconer believes the trial court erred when it charged him with 3 counts of delivery of a controlled substance instead of 1 count. (Read additional statement)

Additional Statement

Additional Ground 1 page 1 of 2

Take for instance a man is driving home without a valid license (a suspended license) and is pulled over by law enforcement and is told to continue on, then a few minutes later is pulled over again and told to continue on and so on till on the last time law enforcement pulls him over and gives him 3 D.W.L.S. tickets.

Now in my mind that should only be one ticket and not 3.

In the Washington State Constitution Article 1 Section 9 it states "No Person shall be compelled in any criminal case to give evidence against himself or be twice put in jeopardy for the same offense" and in Gilberts legal dictionary the term Double Jeopardy 1997 edition { is a provision in the fifth amendment of the U.S. constitution which prohibits the prosecution of a person a second time for the same offense }.

The fifth amendment according to Gilberts legal dictionary 1997 edition says { Amendment to the United States Constitution contained in the bill of rights.

The fifth Amendment provides the privilege against Self-incrimination, The right to due process, the right to just compensation for the taking of property by the government and further bars subjection to double jeopardy.

Due Process of law as defined by Gilbert's legal dictionary 1997 edition is { A flexible term for the fair and orderly administration of justice in courts. Essential to the concept is the right a person has to be notified of legal proceedings against him. }

I believe according to the Washington State Constitution and the United States Constitution my right to Due Process was violated when law enforcement did not notify me of legal proceedings against me after the first controlled buy.

There should be only one charge of delivery not three.