

No. 73113-1-I

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

STATE OF WASHINGTON,
Respondent,

v.

JOHN HENRY JOHNSON,
Appellant.

)
)
) STATEMENT OF ADDITIONAL
) GROUNDS (RAP 10.10)
)
)
)
)
)
)
)

NOV-6 AM 11:22
STATE OF WASHINGTON
COURT OF APPEALS
DIVISION I
[Signature]

I, John H. Johnson, 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.

GROUND ONE

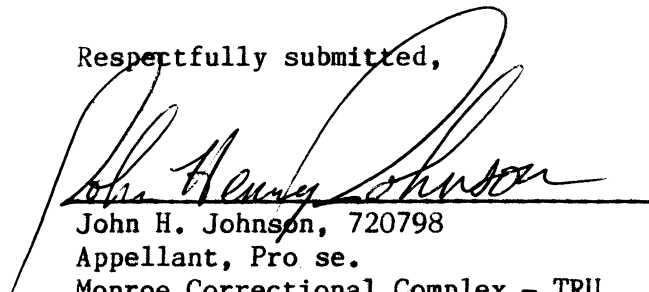
Trial counsel rendered ineffective assistance of counsel when he failed to object to the second motion in limine, filed by the State. (See VRP 1/26/15 Pages 3, 4, and 5). Trial counsel should have moved the court to allow the statements made to law enforcement by Mr. Johnson to be admitted. His failure to do so forced Mr. Johnson to have to testify, thereby allowing the State to introduce the existence of his prior convictions.

GROUND TWO

The trial court erred when it granted the State's third motion on January 26, 2015. The nature of the conviction is not precluded under ER 608 (b). To

quote the State: "...extrinsic evidence of the witness' conduct, other than the conviction itself, is not admissible." The defense did not seek to introduce 'extrinsic evidence of the witness' conduct' as is prohibited by ER 608 (b). This prohibition is in place to limit the introduction of information that would unduly prejudice a criminal defendant. The fact that Mr. Johnson plead guilty in those offenses, as opposed to the current offense, goes to counter the State's proposition that Mr. Johnson has committed similar crimes as the current offense.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John H. Johnson", is written over a horizontal line. The signature is stylized and cursive.

John H. Johnson, 720798
Appellant, Pro se.
Monroe Correctional Complex - TRU
16774 - 170th Dr. SE/P.O. Box 888
Monroe, WA 98272