

FORM 18. MOTION
[Rule 17.3(a)]

No. 46657-1-II

SUPREME COURT or COURT OF APPEALS, DIVISION II OF THE STATE OF WASHINGTON

State of Washington, plaintiff)
v.)
Lawrence Roussel)

Motion for Amendment of
(SAG) Statement of
additional Grounds.

- 1. Identify of Moving Party
- 2. Statement of Relief Sought
- 3. Facts Relevant to Motion
- 4. Grounds for Relief and Argument

FILED
COURT OF APPEALS
DIVISION II
2015 JUN -4 PM 12: 17
STATE OF WASHINGTON
BY [Signature]
DEPUTY

Respectfully submitted,
Lawrence Roussel
Signature

Attorney-for Pro-se

Appeals COURT OF WASHINGTON
FOR Division 2 COUNTY

STATE OF WASHINGTON

Plaintiff,

v.

Lawrence Roussel

Defendant

Case

No. 46657-1-II

MOTION

Proposed Amendment to (SAG)

COMES NOW, the defendant above, Lawrence Roussel, pro se, and moves the court for an order to Amend (SAG).

THIS MOTION is based upon [list any papers of support/evidence, such as record and file, affidavit, or Memo of Authorities].

GROUNDS

1. The defendant Mr Roussel filed in the court of Appeals a (SAG) statement of Additional Grounds. Mr Roussel discovered a very significant page was misplaced and did not or was not included in Mr. Roussel's (SAG)

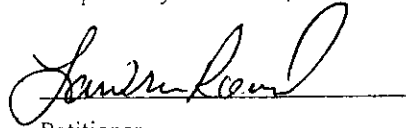
2.

RELIEF SOUGHT

Please Amend Mr Roussel's (SAG) Statement of Additional Ground, and add Breit included to (SAG), Ground 1 and Ground 3. See attached #1 proposed Supplemental Breit Sag

DATED: 29 day of May, 2015

Respectfully submitted,



Petitioner

Lawrence Roussel

Name / DOC# / Unit / Cell

#967756 EA-8

Institution

Coyote Ridge Correctional Center

P.O. Box 269, Connell, WA 99326

Address / City / Zip Code

Proposed Supplemental Brief SaG Ground 1 and 3.

Also in the 911 Audio Cd withheld by the State Prosecutor. Laura Ladden Stated when asked by the 911 operator "that she got in the heat of the moment and that she dialed it" and that she didn't mean to. See exhibit 2-A, mid page. Gary Ladden the alleged victim of Assault 2 Testified under penalty of perjury in open court that he kept hollering for Laura to call 911 and that she handed him the phone and he dialed 911. RP112 Lines 22-24

The State purposely, and maliciously, withheld the 911 Audio Cd and presented and relied on perjured testimony to the jury to secure a conviction. Its pure misconduct by the States prosecutor, and it gives Mr Roussel the argument to dismiss in furtherance of Justice. State v. Burri, 87 Wn 2d 175, 550 P2d 507 (1976); State v. Underwood 33 Wn. App. 833, 658 P.2d 50 (1983) Mr Roussel ask the Courts to Dismiss with prejudice under CR 8.3(b)

Conclusion

The State has no real physical evidence and relied heavily on perjured testimony to secure a conviction and resorted to making false statements to jury as noted in SaG Ground 3.

Please Dismiss with prejudice Mooney v. Holohan 294 US 103, 98 ALR 406 79 LEd 791, 55 Sct 340

Respectfully Submitted by

