

RECEIVED
APR 24 2017
Washington State
Supreme Court
b/h

SUPREME COURT FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON,
RESPONDENT,

v.

JEROME CESAR ZUVERO,
PETITIONER.

SUPREME Ct. No. 94361-3
(Ct. of App. No. 42960-5)

MOTION FOR PERMISSION
TO SUPPLEMENT THE
RECORD
(R 2P 9.10)

1. IDENTITY OF MOVING PARTY

JEROME CESAR ZUVERO, PETITIONER, REQUESTS THE RELIEF DESIGNATED IN PART 2.

2. FACTS RELEVANT TO MOTION

THE FACTS RELEVANT TO THIS MOTION ARE CONTAINED IN THE DECLARATION OF PETITIONER, ATTACHMENT 1, FILED HEREWITH, AND ARE INCORPORATED BY REFERENCE. PETITIONER SUBMITTED AN UNSWORN HANDWRITING ANALYSIS AS EXHIBIT 2 OF HIS MEMORANDUM OF LAW, FILED JUNE 9, 2014. NOW, PETITIONER SUBMITS A SWORN HANDWRITING ANALYSIS, ATTACHMENT 2, WHICH MAKES NO CHANGES TO THE CONTENT.

THE RESPONDENT HAS NOT YET FILED A RESPONSE IN THIS MATTER.

3. GROUNDS FOR RELIEF AND ARGUMENT

PETITIONER, ACTING IN GOOD FAITH, SUBMITTED AN UNSWORN HANDWRITING ANALYSIS (EXHIBIT 2) IN HIS MEMORANDUM OF LAW FILED JUNE 9, 2014. NOW, PETITIONER HAS OBTAINED A SWORN HANDWRITING ANALYSIS, ATTACHMENT 2. THE COURT AND PARTIES WOULD BENEFIT FROM THE SWORN DOCUMENT (ATTACHMENT 2) WHICH MAKES NO SUBSTANTIVE CHANGES.

R 2 P 17.4 (c) PERMITS THE COMMISSIONER OR CLERK TO SUMMARILY DETERMINE WITHOUT ORAL ARGUMENT A MOTION THAT DOES NOT AFFECT A SUBSTANTIAL RIGHT OF A PARTY.

DATED: APRIL 7, 2017

RESPECTFULLY SUBMITTED,

Jerome Leasar Olverto

JEROME LEASAR OLVERTO

ATTACHMENT 1

SUPREME COURT FOR THE STATE OF WASHINGTON

STATE OF WASHINGTON,
RESPONDENT,

v.

JEROME CESSAR JUVERTO,
PETITIONER.

No. 94361-3

(Cl. of App. No. 47960-5)

DECLARATION OF
PETITIONER AND
CERTIFICATE OF
SERVICE

JEROME CESSAR JUVERTO DECLARES AS FOLLOWS:

I AM THE PETITIONER IN THE ABOVE CAPTIONED
CASE NUMBER; I SUBMITTED AN UNSWORN
HANDWRITING ANALYSIS AS EXHIBIT 2 OF MY MEMORANDUM
OF LAW FILED JUNE 9, 2014 IN PIERCE COUNTY
SUPERIOR COURT CASE NO 06-1-02214-1; NOW, I
HAVE OBTAINED, AND AM SUBMITTING, A SWORN
HANDWRITING ANALYSIS, SEE ATTACHMENT 2, AND
REQUEST THAT THE COURT ACCEPT IT IN PLACE OF THE
UNSWORN HANDWRITING ANALYSIS SUBMITTED AS EXHIBIT 2
OF MY MEMORANDUM OF LAW FILED JUNE 9, 2014;
THE SWORN HANDWRITING ANALYSIS, ATTACHMENT 2,
MAKES NO SUBSTANTIVE CHANGES, IT MERELY
CHANGES THE DOCUMENT FROM UNSWORN TO SWORN
MAKING IT A VERIFIED LEGAL DOCUMENT (ATTACHMENT 2);

I, ACTING IN GOOD FAITH, SUBMITTED THE UNSWORN
HANDWRITING ANALYSIS, BELIEVING IT CARRIED THE
EQUAL FORCE OF A SWORN HANDWRITING ANALYSIS BECAUSE
IT WAS PREPARED BY AN EXPERT.

CERTIFICATE OF SERVICE

ON APRIL 19, 2017, I SENT 3 COPY OF THIS DOCUMENT
AND MOTION IN THE ABOVE CASE NUMBER REQUESTING
PERMISSION TO SUPPLEMENT THE RECORD, AS WELL AS
THE SWORN HANDWRITING ANALYSIS AT ISSUE, TO:

1. ~~COURT~~ SUPREME COURT OF WASHINGTON STATE,

CLERK'S OFFICE

TEMPLE OF JUSTICE

P.O. BOX 40920

OLYMPIA, WA, 98504; AND

2. PIERCE COUNTY PROSECUTOR'S OFFICE

930 TACOMA AVE, S.

TACOMA, WA, 98402

VIA U.S. POSTAL SERVICE.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF
WASHINGTON STATE THAT THE FOREGOING IS TRUE AND CORRECT.

SIGNED APRIL 19, 2017

Jerome Cesar Juvenco

JEROME CESAR JUVENCO

ATTACHMENT 2

David G. Cupp

Certified Fraud Specialist
Handwriting Examiner

2225 Oak Hollow Ln. Cordova, TN. 38016

(901) 826-4025 * E-mail emailme@TheHandwritingCop.com

www.TheHandwritingCop.com



Mr. Dallas Jackson
1360 Alcy Road #212
Memphis, Tennessee 38106

September 19, 2013

RE: Jerome Alverto Handwriting

Mr. Jackson:

At your request on September 16, 2013 I did examine and compared the following documents on Jerome Alverto. You also asked if possible, a determination if Mr. Alverto could have written any of the documents that is later identified as the Questioned Documents. Upon completion of that examination I was to look at several other documents and compare those to the Questioned Documents to see if that person could have written any of the Questioned Documents. I was told that other person goes by the name of Eric Rogers.

THE QUESTIONED DOCUMENTS

- Q-1** Copy of a Handwritten Statement that shows to have been dated May 13, 2006 on a form provided by the Pierce County Sheriff/ Tacoma Police. The form indicates that it was completed and signed by Eric Rogers.
- Q-2** Copy of a writing pad that is in print form containing letters and numbers showing on the lower right number 000139.
- Q-3** Copy of a writing pad that is in print form containing letters and numbers showing on the lower right number 000140.
- Q-4** Copy of a writing pad that is in print form containing letters and numbers showing on the lower right number 000141.
- Q-5** Copy of a writing pad that is in print form containing letters showing on the lower right number 000142.

David G. Cupp

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- Q-6** Copy of a writing pad that is in print form containing letters showing on the lower right number 000143.

THE KNOWN DOCUMENTS

- K-1** Copy of a Handwritten Court Document showing a heading of "Superior Court For The State Of Washington For Pierce County". Showing a Plaintiff as being Jerome Ceasar Alverto. On the lower right corner the number 1 is indicated.
- K-2** Copy of a continuation of the document here as K-1 containing print as well as numbers. On the lower right hand corner is the number 9 that's indicated.
- K-3** Copy of a continuation of the document here known as K-1 containing print as well as numbers. This document shows to have been signed January 4, 2012 and bearing the signature of Jerome Ceasar Alverto.
- K-4** Copy of a handwritten address of Jerome Ceasar Alverto.

MY COMMENTS

In order to establish that a signature or handwriting was written by a particular person, an examination with known genuine signatures must show agreement in all handwriting characteristics without unexplainable differences.

David G. Cupp

Certified Fraud Specialist
Handwriting Examiner

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This investigation covered the obvious characteristics such as letter formations, spacing, slant, style and line quality as well as the less conspicuous characteristics including pressure patterns, proportions, connections, speed and initial and terminal stroke formations. An 11-Point Checklist is used in the Exam process. In order to determine Pressure Patterns along with Initial and Terminal Stroke Formations Original Documents are needed.

The first part of the examination is to examine the "Known Specimens" to determine the style and characteristics in ones handwriting. This is done to identify the "Individual Traits" in ones handwriting. These traits are common only to this person and no one else when used in combination with each other. This is accomplished by using the methods listed above in the examination.

The second part of the examination is now to examine the "Questioned Documents" to try and locate the "Individual Traits" identified in the initial exam. My findings or opinion comes about by comparing two sets of documents, the Known compared to the Unknown or "Questioned". If I indicate that the unknown set of documents has the same traits as the known that means that the two groups of handwriting samples was written by the same person. The person supplying the known documents to me will have to prove that persons real name. I am examining one group of writings to or against another group of writings. I am not comparing people to one another just handwritings.

If this examination was prepared using only copies of an original I reserve the right to withhold my final opinion until such a time as I am allowed to examine the original whether it is in court or another location.

By the process listed above I could find **NO Traits or Similarities** between the Known Samples and that of the Questioned Samples. This was indicated to me as being the writings of Jerome Alverto.

David G. Cupp

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Handwriting Examiner

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Questioned Document #1 contains handwriting samples as was relayed to me as being that of a Mr. Eric Rogers. I DID Find Traits or Similarities on this document that is consistent with the other Questioned Documents being Questioned #2 through Questioned #6.

So by what I was furnished the Questioned Documents were written by Eric Rogers.

MY OPINION AND RESULTS

Based on the documents submitted it is my professional opinion that the signature and handwriting that appears on the "Questioned Documents" is not that of **Jerome Alverto but that of Mr. Eric Rogers.**

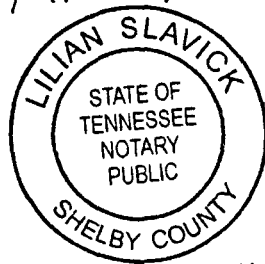
If you have any questions, please do not hesitate in contacting me as I will be prepared to go into greater detail.

*"Sworn and Subscribed before
me at this 7th day of April 2017."*

Respectfully Submitted,

[Handwritten Signature]
David G. Cupp, CFS

Lilian Slavick



My Commission Expires July 14, 2019

This Motion and Memorandum were written by Jerome Caesar Alverto on January 4, 2012.

K-1
2/12

SUPERIOR COURT FOR THE STATE OF WASHINGTON
FOR PIERCE COUNTY

JEROME CAESAR ALVERTO,
PETITIONER,

SUPREME COURT NO: 84926-9
COURT OF APPEALS NO. 42739-7
COURT OF APPEALS NO. 58325-3-II
SUP. CT. CAUSE NO.: 06-1-02244-1

VS.

STATE OF WASHINGTON,
RESPONDENT

MOTION AND MEMORANDUM
FOR POST-CONVICTION DNA
TESTING PURSUANT TO
RCW 10.73.170

(AMENDED)

I. IDENTITY.

COMES NOW JEROME CAESAR ALVERTO, PRO SE, MOVES THIS COURT FOR AN ORDER GRANTING/PERMITTING FOR POST-CONVICTION DNA TESTING PURSUANT TO RCW 10.73.170.

THIS MOTION IS SUPPORTED BY MEMORANDUM OF LAW, AND AFFIDAVIT OF JEROME CAESAR ALVERTO.

II. STATEMENT OF FACTS.

ON MAY 15, 2006, STEPHANIE LYNN WILSON WAS SHOT SEVERAL TIMES BY A MASKED INTRUDER, RP 454, AFTER CONSUMING ALCOHOL AND FIGHTING WITH HER BOYFRIEND, ERIC DERWIN ROGERS, RP 265-266.

IN THE EARLY MORNING HOURS OF MAY 15, 2006, MS. WILSON RECEIVED A TELEPHONE CALL FROM SOMEONE IDENTIFYING THEMSELVES AS ONE OF HER EX-HUSBANDS, JEROME CAESAR ALVERTO, RP 266-67.

MS. WILSON IMMEDIATELY SENT A TEXT MESSAGE TO MR. ROGERS, WHO TOLD HER TO SET HER INOPERATIVE HOME ALARM. MR. ROGERS KNEW MS. WILSON'S HOME ALARM DID NOT WORK PROPERLY, RP 619. MR. ROGERS CALLED MS. WILSON BACK FROM HIS CELLPHONE AND SAID HE WANTED TO COME OVER TO HER HOME, BUT MS. WILSON SAID, NO, RP 270.

K12
D10

VI. CONCLUSION.

1 THE UNITED STATES SUPREME COURT HAS RECOGNIZED THAT
2 "DNA TESTING HAS AN UNPARALLELED ABILITY TO BOTH EXONERATE
3 THE WRONGLY CONVICTED AND TO IDENTIFY THE GUILTY."
4 DISTRICT ATTORNEY'S OFFICE FOR THE THIRD JUDICIAL DISTRICT
5 V. OSBORNE, 129 S.Ct 2308, 2312 (2009). WASHINGTON
6 STATE RECOGNIZED THE IMPORTANCE AND POTENTIAL OF POST-
7 CONVICTION DNA TESTING WHEN IT ENACTED RCW 10.73.170,
8 AND THEN REVISED THE STATUTE TO INCREASE ACCESS TO
9 POST-CONVICTION DNA TESTING. TO DATE, 260 INDIVIDUALS
10 HAVE BEEN EXONERATED ON THE BASIS OF POST-CONVICTION
11 DNA TESTING, THREE OF WHOM WERE CONVICTED IN
WASHINGTON STATE. (SEE THE INNOCENCE PROJECT, "KNOW
THE CASES", AT [HTTP://WWW.INNOCENCEPROJECT.ORG/KNOW/](http://www.innocenceproject.org/KNOW/) (ACC-
ESSED JULY 28, 2011)).

12 THE STATE PROVIDED DNA TESTING OF SPECIFIC EVIDENCE,
13 BLOOD FOUND ON PETITIONER'S PANTS, THAT IT KNEW OR SHOULD
14 HAVE KNOWN WAS FABRICATED BY DISGRACED PIERCE COUNTY
DEPUTY, BRYAN DWAIN CLINE.

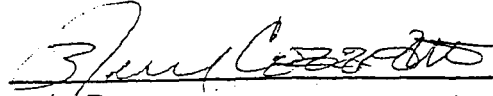
15 THE PETITIONER CONTENDS THAT IF THE BLOOD ON HIS
16 PANTS WAS RELIABLE, AND NOT FABRICATED, THEN ALL THE
17 EVIDENCE: 1) THE HUMAN HAIR; 2) SUSPECT DNA CONTAINED
18 IN THE VICTIM'S FINGERNAILS; 3) THE SCRIPT INSIDE THE
SMALL MEMOBOOK; AND 4) THE PETITIONER'S CELL PHONE
RECORD(S), SHOULD POINT TO HIS GUILT.

19 THE STATE, KNOWING THE PETITIONER WAS INNOCENT
20 OF THE CRIME CHARGED, AND SET UP BY DISGRACED
21 DEPUTY BRYAN DWAIN CLINE, DELIBERATELY FAILED TO
22 TEST THE HUMAN HAIR AND FINGERNAIL SCRAPINGS
FOR DNA; LIKEWISE THE STATE DELIBERATELY FAILED
23 TO PERFORM FORENSIC HANDWRITING ANALYSIS/TESTING
OF THE HANDWRITING INSIDE THE SMALL MEMOBOOK;
24 AND THE STATE DELIBERATELY FAILED TO TEST/OBTAIN
25 THE PETITIONER'S CELLPHONE RECORD(S), IN A DELIBERATE
EFFORT TO WRONGLY CONVICT THE PETITIONER.

K-3
D/C

1 DUE TO ONGOING ADVANCES IN TECHNOLOGY, DNA TESTING
2 OF THE HUMAN HAIR AND FINGER/TOE SCRAPINGS; AND
3 FORENSIC TESTING OF THE HANDWRITING INSIDE THE
4 SMALL MEMO BOOK AND THE PETITIONER'S CELL
5 PHONE RECORD(S) WOULD BE NEW, MORE ACCURATE,
6 SIGNIFICANT AND MATERIAL EVIDENCE, AND WOULD
7 PROVE THE PETITIONER'S INNOCENCE AND REVEAL
8 THE PERPETRATOR'S TRUE IDENTITY.

DATED THIS 4th DAY OF JANUARY, 2012.


JEROME CESAR SUELTO
322854
CLELLEN BOY CORRECTIONS CTR
1830 EAGLE CREST WBY
CLELLEN BOY, W.V. 98326

JEROME LESSER ALBERTO

322854

COYOTE RIDGE CORRECTIONS CENTER

1301 N. EPHRAIM AVE

CONNELL, WA. 99326

K-4
D/C

104

Q-1
D-1

Page 1 of 1

INCIDENT #
061330256

INCIDENT #
061330256

HANDWRITTEN STATEMENT FORM

PIERCE COUNTY SHERIFF/TACOMA POLICE

Date 5-13-06 Time 0800

Eric Rogers I am 36 years of age.

119 119th St SE #E-34 with no one

at Cococo Staff in Lynwood and also at Harborview Medical

informed of my constitutional rights. _____

On: On the evening of May 12th around 11:00pm

ie and I went to play pool. We were having a
 and suddenly around 1:00am she was ready to go
 got home approx. 1:10-1:15am. She had a slice of pizza
 and the restroom. We went to bed and she got said she wanted
 I tried to convince her to stay but she insisted
 trying. Later around 4:15-4:20am I received a text
 saying her ex husband called threatening her. She said
 want me to come down and she would call me in the
 when she awake. I came down anyway and arrived
 15am. Since I have a garage apse I came thru there. I noticed
 were on ~~the way~~ I walked as far as the stairway calling out
 in name I got no answer. I began to look around and
 lead on the front door. I left and when I came out a
 a policeman saw and approached me.

WAS
QUEST

and correct statement to the best of my knowledge. No threats or promises have been made to me nor any
 list me.

Eric Rogers
Signature

126 97021

134

MATCHES ERICS HANDWRITING

Pg 104

Q.2
D.C.

remove[↑] cell (GPS)

↓
5:30 → 6 am

(5 am)

has to look natural

cuts, ramsack truck &
purse,

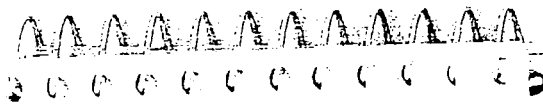
(1 425 867 5155)
↓ ↓ ↓
(1 253 232 0051)

135

MATCHES ERIC HANDWRITING

Pg 104

Q-3
JHC



(tools)

- gun
- taser
- knife -
- handcuffs
- tape
- shoe covers
- gloves
- flash light
- scarf or face mask (white face mask)
- trash bags (2 large, 4 small)

(Pg 104) ^{SOME} CURVE → stranger hair / condom /

136

Q-4
~~DK~~

(dress code)

dark pants

dark shirt

glove

stocking cap & face mask

tape gloves to shirt

tape eyebrows

tape pants to shoe cover

tape pockets

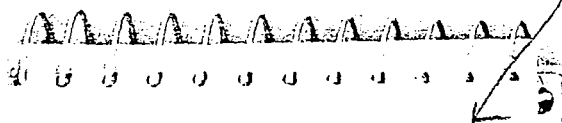
000141

(TOTAL PAGES - 18 OF 20)

Q-5
D/C

CHARACTER THAT ARE
EXACTLY
IDENTICAL
TO ERIC'S
HANDWRITING

BUT SHE SAID
THAT THE STICKER
COMMUNICATED
WITH HER.



- E'S
- O'S
- 3'S
- 4'S
- 8'S
- V'S
- N'S

(execute) ^{no} communication

enter garage Jam;
wait til anyone
enter; taser individual;
handcuff right arm to
(L) leg; handcuff (L) arm to
right leg; tape arms &
tape legs together (added
restraint);

138

Q-1
Q-10

(options)

set her on fire

Act out a carjacking
gone bad

taser - stab her
in her garage and
smear blood in garage

000143