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DEC 10 2009

No. 63476-3-I

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

FILED
2009 DEC 10 AM 11:31
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STATE OF WASHINGTON
Respondent

v.

STEVEN L. LEONARD JR
Appellant

On Appeal from The Superior of THE
STATE OF WASHINGTON for King County

The Honorable Michael C. Hayden, Judge

Pro SE Informal BRIEF OF Appellant

STEVEN L. LEONARD
Doct# 846 370
Washington State Penitentiary
1313 N 13th AVENUE
WALLA WALLA, WA, 99362

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(Not Included, for proof of alterations to pg 63 of 91 of CV's Jan 16th
2008 Transcript Look at J. Kays Reexam of C.V, Kays ask CV. If she had them placed

Cover page of Defence Interview

Proof of J. Kays Direct Knowledge of false Evidence

J. Kays being at Interview, Pgs 36 of 39, and 37 of 39

OF Interview ----- A1, A2, A3

Pgs 86 of 91 and 87 of 91 of CV's Jan 16th

2008 Interview with SPD Det. Proof of Evidence

not being part of case, Black underpants submitted before

Interview with SPD; By Kazmier, Direct Exam pg ----- B1, B2, B3, B4

Deam Martin Direct exam, show search of

Back pack no blk undpts, Questioning avoided

about undpts by Kays ----- C1, C2

Trial Notes, Proof of me telling Attorney about the

false hood of Evidence, Amanda Pederson Direct Exam pg

Matches with facts of Evidence being false ----- D1, D2, D3, D4, D5

COURT OF APPEALS
OF THE
STATE OF WASHINGTON

1 of 7

1 STATE

King Co. Superior Court # 08-1-00912-95EA

2

APPEAL Case # 63476-3-1

3

VS

4

STEVEN LEONARD JR.

Prose INFORMAL Appeal Brief

5

APPELLANT

6

7

I STEVEN L LEONARD JR is seeking relief from all charges
8 under King Co. Superior Court cause # 08-1-00912-95EA

9

10

Argument.

11

12

On March 12, 2009 I entered a plea of not guilty to all
13 charges against me, with the idea that I would face
14 trial with every item of Discovery that was in at
15 the time, on the date of March 12, 2009. My trial was
16 set to start later in the month.

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On March 27th 2009 the state prosecutor Julie
19 Kays had an interview with the alleged victim Chelsea
20 VanStelle. My counsel was present.

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During that interview J. Kays asked C.V to amend
21 information on her Jan 16 2008 Incident Report statement
22 transcript. The amendments made were to correct
23 conflicts in statements C.V gave in later times
24 that year (2008.) The first correction was in amounts
25 of money that C.V said she paid me from a act
26 of prostitution she committed under my influence.
27 In the unamended transcript C.V says that she made
28 80.00\$ Dollars from the act and the next she said
29 that she paid me seventy five Dollars.

In the March 27th Amended Jan 16 2008 Document
31 C.V says that she made 38.00\$ Dollars and that
32 she paid ME 35.00 Dollars. The amendment was

1 Made by C.V. The Document was altered by pen and
2 C.V. Initialed and Dated that change.

3 The second Amendment is on pg 63 of 91 on the
4 Jan 16th 2008 incident report statement transcript document
5 C.V. was told by J. Kays to write on a sticky pad
6 that C.V. got really Drunk and blacked out.

7 After J. Kays made copys. During trial the Document
8 was entered as exhibit number 28. on March 31st 2009
9 Me and My Attorney did not get a copy of the Document
10 (Altered STATEMENT Transcript) until the day C.V. was to
11 give testimony on April 1st 2009. C.V. gave testimony
12 to the amendments that J. Kays asked C.V. to make. My
13 Attorney crossed her about some of the Amendments.

14 In C.V.'s Jan 16th 2008 statement ex. 28 C.V. stated that
15 she did not know where a pair of underpants
16 (panties) was that she claimed she got from Amanda
17 Pederson. Dean Martin was also recorded on the transcript
18 saying that C.V. did not have on any underpants
19 when she was found and taken home. In Direct
20 Exam Amanda Pederson gave testimony that she
21 did not give C.V. underpants (Panties) to have or
22 borrow. Pg 41 lines 7+09 Trial transcript A.p exam.

23 In a statement done by prior Defence Counsel Mark Flora
24 page 37 C.V. states that she only had jeans loaned
25 to her. on page 36 C.V. says that she ditched her
26 under pants, Mark Flora asks her did Amanda Pederson
27 or Kirstin Forbes loan her any under pants, then C.V.
28 gives the answer ~~no~~ on 37^{ps}. This statement was
29 taken August 6th 2008, this statement was not used during
30 trial. J. Kays was Present during the interview.

31 I asked My attorney Micheline Murphy to point
32 out the fact that the black under pants did not
33

1 Have anything to do with the case. My Attorney told me that
 2 It didnt matter where the underpants came from because
 3 My DNA was not found in them. I explained that that iter
 4 Makes it seem like I was leading C.V around an influencing
 5 her to have random sex with people and do sex acts.
 6 I again pointed it out to her again during trial on
 7 a legal pad I was keeping trial notes on. I would
 8 write questions so I would not have to talk during trial
 9 I told her that the under pants did not come from Amanda.
 10 (copy of trial notes attached.) (copy of Aug 6 statement pgs. 36 and 37
 11 attached)

12

13

(Grounds)

14

1) R.P.C 3.4 A lawyer shall not:

15

(A) unlawfully alter, destroy or conceal a document
 16 or other material having potential evidentiary value

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When I entered my plea of not guilty on
 March 12th 2009, C.V's Jan 16th 2008 Incident report
 statement did not have any Amendments. On pg
 63 of the potential Evidence document J.Kays
 had C.V put a sticky note on it explaining that
 she got drunk and could have blacked out. This was
 not stated before, in any interview by state, police or
 my attorneys. J.Kays used this bit of false testimony
 to open up the Door to explain DNA Evidence found
 in black underpants that C.V gave to officials.

J.Kays asked C.V If she could have had sex
 with anyone and C.V said she could have but

1 was drunk. J. Kays had the knowledge that the black
2 underpants ~~was~~ was submitted by C.V. unexplained,
3 J. Kays then on March 27th asked C.V. to make the alteration
4 to help the States case and to make room for the false
5 evidence. (U.S. v. Goodson 165 F3d 610 (8th Cir 1999)
6 the prosecution may not use or solicit false
7 evidence or allow it to go uncorrected.) J. Kays knew
8 that it would make the States case look bad if they
9 let it be known that the black underpants did not
10 have any thing to do with the case. It would open
11 up the door for sexual history to be explained because of
12 the DNA that was found. J. Kays avoided asking Martin
13 during exam, if C.V. had on underpants, was she found
14 with the black underpants. My Attorney did not also.
15 J. Kays knew the black underpants would hurt the
16 States case so she asked C.V. to write the amendment
17 on pg 63 of the Jan 16th 2008 statement to open
18 the door to be able to explain the evidence, place it
19 to help the States case by making me seem like I
20 had influenced this act. J. Kays did not make an effort
21 to point out the facts that would not have placed
22 the evidences and did not correct the fact that the
23 evidence did not have a part in the crime, J. Kays
24 led C.V. to give false testimony to explain/open the
25 door to help present false evidence.

26 J. Kays asked C.V. to unlawfully alter a potential
27 evidence document or evidence document by asking C.V.
28 to make the amendments. Potential evidence document
29 because if C.V. had died, been placed in a coma or
30 not able to speak the document would have become a
31 main item of evidence to prove that C.V. had made a
32 claim and that she had I.d me as a suspect
33

1 And also as a marker for dates that she claimed the events
2 took place. CIVIL RULE 60, (B) (1) Surprise,

3 I did not know that I would have been facing
4 an Amended Statement, No motions was put in by
5 the state to have the document altered to help explain
6 points that I was counting on to help my defence.
7 (4) Fraud, whether heretofore denominated intrinsic
8 or extrinsic, Misrepresentation, or other misconduct
9 of adverse party

10 J. Kay's let evidence that did not have anything
11 to do with the case in an manipulated it to help her
12 case. Thus, although a lawyer should resolve doubts
13 about the veracity of testimony or other evidence
14 in favor of the client, THE LAWYER CAN NOT
15 IGNORE AN OBVIOUS false hood.

16 Ineffective assistance of counsel.

17 I asked M. Murphy to point out the fact that the evidence
18 did not have anything to do with the case (Black under pants)
19 She did not. M. Murphy did not challenge the unlawful
20 amendments to the potential evidence document although
21 she knew it would hurt us on proving grounds
22 for impeachment. Although M. Murphy seen that the
23 alterations was made to explain important contradiction
24 that we needed to use for my defence, Also that the
25 alterations were made after March 12th, she made no
26 effort to point out the leading in to false testimony
27 or other key points.

28 The Jan 16th 2008 Incident Statement
29 Transcript has the Incident # 08-16907 above.
30 Testimony evidence does not go back to the jury but
31 is still in some cases looked at as evidence. M. Murphy
32 did not point that out during trial.

1 Questions

2 Is A lawyers allowed to change documents, or ask
3 others to change document to manipulate the way the
4 Evidence is presented?
5

6 Is the first Victim statement report, incident
7 report used to make argument for probable cause and
8 placed in to Evidence Discovery, handled as Evidence.
9 It is also not allowed in the hands of the defendant
10 with out approved Amendments because it has evidence
11 value, and important information can be used and manipulated
12 situations and testimonys.
13

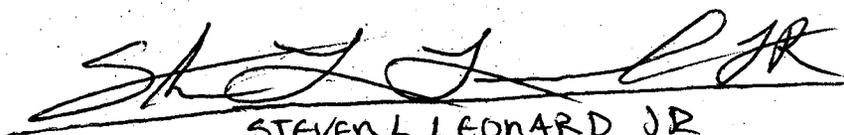
14 Is it not against the rules for a lawyer / Prosecutor
15 to let Evidence they know has potential to not be a part
16 of a case to go in to a trial and unchallenged and
17 uncorrected?
18

19 Conclusion

20 I see reason with in the above grounds and
21 arguement for My Judgement to be overturned. The above
22 Shows wrong acts by the state and my counsel as
23 well. I dont think a new trial would help because
24 the Alleged Victim was manipulated to make changes
25 in statements and give false testimony. You can
26 not make a person forget. Within I have provided information
27 to prove that Kays had knowledge that the black underpants
28 did not fit in the case and that she manipulated a
29 testimony of a key witness, Also that is witness tampering.
30 If the evidence was naturally a part of the case, J. Kays
31 would have had no reason to ask for the amendment to
32 be made to allow the door to be opened. THE Alleged victim
33 has been corrupted, and can not be trusted for true testimony

Certification

1
2 I STEVEN LEONARD under the laws of the State
3 of Washington and United STATES Federal laws
4 do present this Pro Se Informal Appeal Brief and
5 documents with it under the penalty of perjury
6 that the Items are true and correct to the best
7 of my knowledge.
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STEVEN L LEONARD JR

State v. Steven Leonard
Cause No. 08-1-00912-9
Defense Interview of e

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2
3 Interview Location: Prosecutor's Office
4 King County Courthouse
5 516 Third Avenue
6 Seattle, Washington

7 Interview Date: August 6, 2008
8 Interview Time: 4:30 p.m. (Approximate)

9 Present: Mark Flora, Defense Attorney, Society of Counsel
10 Aimee Sutton, Defense Attorney, Society of Counsel
11 Lynn Slaughter, Defense Investigator, Society of Counsel
12 *Julie Kays, Prosecuting Attorney, State of Washington
13 Detective Todd, Seattle Police
14 Detective Bill Guyer, Seattle Vice Unit
15 Claudia Solvik, Victim Advocate

16 SLAUGHTER: Okay. I'm going to start the recording. This is the interview of
17 in the case of State v. Steven Leonard. Today's date is
18 Wednesday, August 7th? 6th, August 6th. The time's now 4:31.
19 do we have your permission to record this interview?

20 Yes, you do.

21 SLAUGHTER: Okay. And we'll just go around the room for the transcriptionist and
22 uh put ourselves on tape, so uh, Julie, if we could start with you?

23 KAYS: Sure. Julie Kays, Deputy Prosecuting Attorney, and you have my
24 permission to record.

25 TODD: Detective Todd and I'm with Seattle Police. You have my permission
26 to record.

27 SOLVIK: Claudia Solvik, Victim Advocate. You have my permission to record.

28 You have my permission to record.

GUYER: I'm Bill Guyer, Seattle Vice Unit. Permission to record.

FLORA: I'm Mark Flora, Defense Lawyer, and you have my permission to
record.

SUTTON: Aimee Sutton, Defense Attorney. You have my permission to record.

KAYS: So Cl a, you're gonna have to like enunciate your words a little for
me, okay?

1 SLAUGHTER: Okay.

2 CV Bowl of noodles, yeah.

3 SLAUGHTER: Okay. And then used the rest, do you much money you spent on the weed?

4 CV Um, I think we spent about 30 dollars.

5 SLAUGHTER: ~~And then did, did you in fact sell that weed for more money?~~

6 CV ~~We had sold half of it and then we smoked the other.~~

7 SLAUGHTER: And how much did you sell that for?

8 CV Um, I don't remember.

9 SLAUGHTER: Okay.

10 FLORA: Um, during these five days, uh, what were you doing for clothes?

11 CV For clothes. Um, at A's house I had uh I had, I used some of her clothes, if my clothes were really dirty and then where I'd wash the clothes, the one pair of clothes that I had and um at one point I had used a pair of her jeans.

12 CV
13 }
14 FLORA: * Do you remember what uh clothes you had when you met her?

15 CV * Uh, when I met Pepper, I was wearing a, a pair of clothes and then when I went, I went to um KK or K's house, and she um gave me a pair of clothes or a pair of pants to wear because mine were like capris and I was cold so she gave me a pant, a pair of pants, pair of jeans.

16 CV
17 }
18 FLORA: * Okay, how about things like, like underwear and uh and top or?

19 CV I had uh bra and underwear.

20 FLORA: Did uh?

21 CV * ~~We washed them.~~

22 FLORA: * Okay. ~~And what, what was those the only ones you used that throughout the whole four or five days?~~

23 CV * ~~Yes. Um, I think, so, we I had used my bra the whole time and um I ditched my underwear like halfway into the experience of being gone.~~

24 CV
25 FLORA: * Okay. Did uh A or KK loan you any of theirs, underwear that is?

26

27

28

1 CV : * No, no. The only pair, the only item of clothing that I had loaned to me
2 was um a pair of pants that I had kept. And then I wore um um
3 A pair of jeans for like a day and then gave them back to her.

3 FLORA: Okay. When you, when you ran into your uncle, was it KK's pants
4 you had on?

4 CV : I was, yeah.

5 FLORA: Okay.

6 SLAUGHTER: While you're looking, I have a follow-up question. Do you know what,
7 you said you ditched the underwear. Do you know what date you
8 ditched, ditched the underwear?

8 CV : Probably around the second or third day. I think it was that night. Uh
9 second or third: I think it was the second night.

10 SLAUGHTER: Okay.

11 FLORA: Uh tell us about K and KK. Did, did you get along with, with,
12 with both of them?

12 CV : Uh, at first I got along with uh KK and then she, she was um, uh
13 Pepper's girlfriend or fiancé, I guess. And um he, uh she, he was oh,
14 she was okay with her, with him having a girlfriend, but um I guess
15 she got jealous or something and got in a fight with uh Pepper and me
16 and her didn't talk afterwards as she didn't like me afterwards. But
17 the whole time, A was my friend.

16 FLORA: Okay. Did you have a, a camera or did your cell phone have a
17 camera?

17 CV : I have a um, I have I, the first night I threw away my cell phone, but I
18 had a camera and I had that the whole time.

19 FLORA: Okay. Did you still have it when you met up with your uncle?

20 CV : Yes.

21 FLORA: Did you take some pictures?

22 CV : I had two picc, or I had a picture of Pepper. I think I had one or two
23 pictures of him and then I had a picture of KK's mom.

23 FLORA: Okay. Do you remember where you spent uh each of those nights? It
24 sounds like they were, were there four nights or five nights or however
25 many there were?

B1

SEATTLE POLICE DEPARTMENT

INCIDENT NUMBER
08-16907

DATE 1-16-08 TIME 2045 hours PLACE

STATEMENT OF:

C.V. Yes.

VAN BRUNT: Is that correct?

C.V. Yes.

VAN BRUNT: In between then and now, how many times have you taken a shower?

C.V. Two or three times, maybe four.

VAN BRUNT: Okay. Were you wearing those jeans before you had sex with him and after, or just after?

C.V. After.

VAN BRUNT: Just after. Okay. Now your underwear, do you still have that underwear with you that you were wearing throughout the days that you spent with Pepper?

C.V. No.

VAN BRUNT: Where's that underwear?

C.V. Those ones are either, they're probably, either at A [redacted] house or they're in her laundry room.

VAN BRUNT: So they're at A [redacted] house.

C.V. Yes.

VAN BRUNT: Either in her room or the laundry room. Can you describe that underwear to me please?

C.V. They're red and on the butt they have kiss marks all over. And on the front, it says kiss.

VAN BRUNT: And are the full underwear?

C.V. Yes. They're full underwear.

VAN BRUNT: *And did you wear any underwear after you got rid of this underwear?

C.V. *Not for like an hour and then she gave me underwear.

STATEMENT TAKEN BY: Detective Van Brunt

SIGNED:

WITNESS:

WITNESS:

SEATTLE POLICE DEPARTMENT

INCIDENT NUMBER
08-16907

DATE 1-16-08 TIME 2045 hours PLACE

STATEMENT OF:

VAN BRUNT: And, and you wore, at what time did you change underwear?

CV

You mean from the, my ones that I originally had...

VAN BRUNT: From your underwear that...

CV

After I took a shower at her house.

VAN BRUNT: And what day was this that you got underwear from her?

CV

This was the, the day before I got the jeans. So...

VAN BRUNT: The night, the day you spent the night in the shed.

CV

Yes.

VAN BRUNT: Is the day you got the underwear...

CV

Yes.

VAN BRUNT: ...from A [redacted] who lives in White Center.

CV

Yes.

VAN BRUNT: So, where's that underwear?

CV

I don't know. I wasn't wearing it when I got here. *

Jean. M [redacted] When she got here, she had no underwear on and a pair of jeans. I've saved those pair of jeans.

VAN BRUNT: So Mr. M [redacted] you're saying she didn't have underwear on, but she had a pair of jeans and you've saved those jeans and are those the jeans you've turned over to us?

Jean M [redacted]

Yeah. And they have not been laundered.

VAN BRUNT: Okay. But you don't know what happened to that underwear?

CV

Yeah. I don't know. *

VAN BRUNT: Okay.

CV

I, I took them off, I don't remember what I did with them. *

STATEMENT TAKEN BY: Detective Van Brunt

SIGNED:

WITNESS:

WITNESS:

1 BY MS. KAYS:

2 Q. Doctor Kazmier, I wanted to -- you told us
3 that Chelsea's sexual assault examination was
4 conducted January 2008, on the 14th?*

5 A. Correct.

6 (Counsel writing on diagram)

7 Q. So I wrote underneath where it says
8 Children's Hospital with Chelsea, I wrote sexual
9 assault examination on that day; is that accurate?

10 A. Yes.

11 Q. Okay. We were talking about the collection
12 of swabs, and we've obviously discussed the sexual
13 assault kit and examination at length. I want to
14 give you back State's thirty-one.

15 A. Thank you.

16 Q. And ask about if there was a -- if you
17 documented at all any of the other items that were
18 collected that day, in other words, clothing,
19 underpants, anything along those lines?

20 A. Yes, so on page -- emergency department
21 sexual assault report, where it says assessment and
22 plan, there is a box for evidence collected, and I
23 checked that box, and then there's a list of all of
24 the possible evidences that may be collected --

25 Q. And did you --

KAYS / KAZMIER - Direct exam.

1 A. -- and --

2 Q. -- indicate what items, again, setting
3 aside the sexual assault kit and swabs itself, were
4 collected?

5 A. Yes.

6 Q. And what were those items?

7 A. They were underpants. *

8 Q. Go ahead.

9 A. Orifice swabs, including oral, vaginal and
10 rectal.

11 Q. And that would be in the sexual assault
12 kit, right?

13 A. Correct.

14 Q. Okay.

15 A. Skin swabs, forensic, urine, clothing and
16 other.

17 Q. And in terms of -- you talked about -- we
18 talked about the sexual assault kit, and the fact
19 that you had a partner with you, the nurse who was
20 assisting you in conducting all of that.

21 Was the nurse also assisting you in
22 collecting, I guess, any clothing or other items as
23 well?

24 A. Yes.

25 Q. Okay. I want to ask you it occurred to me

1 it was either Steven Leonard or the girl that he was
2 with.

3 Q. Okay.

4 A. But, nonetheless, we gave them back the
5 dog, and we got in the car and drove away.

6 Q. What -- Without telling me what Chelsea
7 said to you, can you describe her demeanor or
8 attitude when she got into the car?

9 A. Well, at first, she was real quiet. As we
10 spoke to her, she seemed a little belligerent, and
11 that's something I'd never experienced with Chelsea
12 before.

13 Q. Mr. Martin, at any point after getting
14 Chelsea in the car, at some point after getting
15 Chelsea in the car, do you look through her
16 belongings at all to see if there's anything there
17 that shouldn't be there?

18 A. My wife actually searched through the
19 belongings. She was in the back seat with Chelsea.

20 She found a backpack that had some clothes,
21 it had some -- it had a can of Old English 800 malt
22 liquor, full.

23 Q. Okay.

24 A. And then it had a camera that was
25 Chelsea's.

1 Q. At some point that day, Mr. Martin, do you
2 contact the police in order to make some type of
3 formal report?

4 A. Yes, we went directly from Nordstroms --
5 I'm not sure what the address, I think it's 8th and
6 Stewart.

7 Q. Okay.

8 A. Or there's a new police station. I didn't
9 even know it was there, but that's where we went,
10 and made a report out on the sidewalk there 'cuz,
11 apparently, it's not open that time of night, they
12 don't have somebody at the desk.

13 Q. Can you recall about what time it was at
14 that point?

15 A. Probably close to ten, maybe between nine
16 and ten. I mean --

17 Q. P.m.

18 A. -- P.m. yeah. It is dark, and cold.

19 Q. Mr. Martin, that evening, where did Chel --
20 where did you take Chelsea to -- who did she spend
21 the night with?

22 A. She went to my houses.

23 Q. At some point, do you bring Chelsea back or
24 give her the opportunity to talk with her grandma?

25 A. She spoke with my mother, her grandmother,

No Questions
about clothing

Trial Notes

~~000~~
101

CV Jan 16, ~~She says~~ that we only had sex at amandas house once. She said the second night

Pg 54 of 91

Pg 56, 91

pg 65 of 91 She says that we had sex at amandas house again. With amanda in the room.

CV was happy to be around gang members

CV unc, an ant,

~~(Not Protocol) Interview~~

ask him if when he went to CV house is that when he uptained the black pair
*I think CV brought parties to the hospital

← By M. Murphy

She says she has on the same undergarments that shes had on the whole time.

C.V says ~~nothing~~ of the P3R sex things until they found the DNA and it was Jordans idea to go to tukwila

yes. I know.

So, I'm just supposed to know this girl is 12 years old, have sex with her in public? that's what they're saying... Logic Have marks

Trial Notes

~~12~~
D.2

Jan 16

CV She says we wake up and go to sleep after having sex, she says ~~we~~ have sex a couple times.

pg 68 She states that she was walking the dog not working as a pros.

She says that she told me her age the day after we had sex.

1 DNA from pink pair under pants
Match ONE found in blk pair
Jordan cross over, Dirty Move

Statement
BY ME

She, J, says lied, those blk underpts, Did not come from amanda, No way could she have had 2 guys one that match the other

M/A

Q - where did they come from? ← M. Murphy
C.V house, police collected them in hope, {yes, I know how police got M. Murphy

M. Murphy
a →

H:
How did CV get the panties. (They were ~~here~~) (My answer)

~~D3~~
D3

Shower external only, would not wash DNA out from inside a person.
State vs. Blackmon, pg 1 & pg 2
Vic takes shower and they still find DNA.

In Det. 1st interview Dean Martin said that C.V had on No underpants when she came home F MY writing

It really ~~doesn't~~ matter ~~WHERE~~ the panties came from so long as your DNA ENH there...
M. MURPHY

I just wanted it pointed out because it would show she J. Kays is twisting stories (My writing)

~~To ~~show~~ if,~~
~~XXXXXXXXXXXXXXXXXXXX~~

But make a reason that could be believable

I talked about DNA because I did not want to have to get Kay in trouble she is over 36 months. The letter I wrote to her told her that IF my DNA came up the only way could be from here and she would have to tell about when they made out. In event she didnt, I stressed my self to death, Not to snitch

1 arrangements were.

2 A. It was -- I don't think she was there the
3 last night 'cuz she was only there for three nights
4 or two nights.

5 Q. You only recall her being there two nights?

6 A. (Nodding head).

7 Q. Is that a yes?

8 A. Yeah, 'cuz I remember the first two nights
9 she was there, then the third night her -- Chelsea
10 and Steven went to go stay with a family member, and
11 then the fourth day, we met back up, and it was
12 later that night that her family had come picked her
13 up.

14 Q. Is it possible that she spent three nights
15 there and you just don't recall?

16 A. I don't think so.

17 Q. Okay. Ms. Pederson, at any point, did you
18 loan Chelsea clothing?

19 A. Yes, it was the last day that she was
20 there.

21 Q. And tell me about the clothing that you let
22 her borrow from you.

23 A. It was a pair of pants.

24 Q. And when you say pants, can you describe
25 them for me?

1 A. It was -- they were -- I think they were
2 like a light blue or something. They were from
3 Aeropostale, I had just bought them a week before
4 that.

5 Q. So are they jeans?

6 A. Yeah.

7 Q. Did you let her borrow a pair of
8 underpants?

9 A. No.

10 Q. At any point during the time that Chelsea
11 stayed at your apartment, did she take a shower or a
12 bath?

13 A. She took a shower once that I knew of.

14 Q. Is it possible that she took a shower more
15 than once and you just weren't there for it?

16 A. I was there --

17 MS. MURPHY: Objection as to speculation.

18 THE COURT: Is she aware of -- I'll
19 sustain the objection.

20 BY MS. KAYS:

21 Q. Were you with Chelsea every time she was in
22 your house, or were there times --

23 A. Yes.

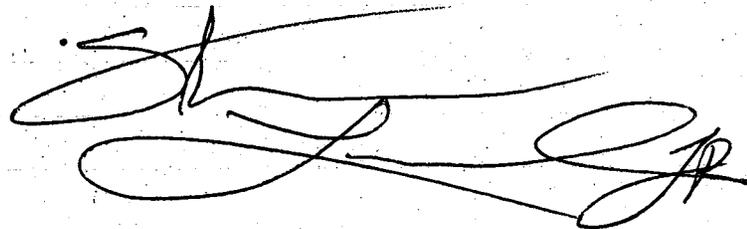
24 Q. -- when you weren't there and she was there?

25 A. Hum-um, I was there the whole time.

Court of Appeals Division 1

I Steve Leonard is asking to withdraw the pro se Informal Appeal Brief I sent in before, Due to me not meeting proof of service guidelines and also I did not have times and dates correct.

I am now submitting My Pro se Informal Appeal Brief, All of the partys need have been sent Proof of service and copys of the new document

A handwritten signature in black ink, appearing to read 'STEVEN LEONARD JR', with a stylized flourish at the end.

STEVEN LEONARD JR