

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

STATE OF WASHINGTON)
)
 Respondent,)
)
 v.)
)
ROBERT HALL JR)
 (your name))
 Appellant)

No. 73741-4-I
 STATEMENT OF ADDITIONAL
 GROUNDS FOR REVIEW

FILED
 COURT OF APPEALS DIV 1
 STATE OF WASHINGTON
 2016 MAY -2 AM 11:08

I, Robert Hall Jr, 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.

Additional Ground 1

The Court Abused it's discretion when reviewing the facts of my 2.6 Hearing. The Court erred by denying motion to suppress evidence. An arrest warrant was used as a pretext to gain access to my dwelling. Vol I Pg 23 line 5-17, Vol II Pg 23 line 23-24, Vol II pg 24 line 4-6. A Violation of Art 1 § 7 of WA Constitution

Additional Ground 2

Court erred by Allowing Accomplice liability instruction. Vol 6 Pg 56 Ln 21-25, Pg 57, 58, 59, 60 Ln 1-25, Pg 61 Ln 1-3. State vs. Teal is applied to circumstances different from them and is an abuse of discretion. State was relieved of its burden of proof by this instruction, there by prejudicing defendant.

If there are additional grounds, a brief summary is attached to this statement.

Date: 4-27-2016

Signature: 