

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
COURT OF APPEALS

05 JUL 26 PM 1:09

STATE OF WASHINGTON

STATE OF WASHINGTON)
)
Respondent,)
)
v.)
)
Gary A. Boyd)
(your name))
)
Appellant.)

No. Case # 34158-1-IIOMM

STATEMENT OF ADDITIONAL
GROUND FOR REVIEW

I, Gary A. Boyd, 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

attached

Additional Ground 2

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

Date: July 24, 2006

Signature: Gary A Boyd

Court of appeals, re: case # 34158-1-II

I believe the statute RCW 9A.44.115(2)(b) is unconstitutional because it is overly broad and vague and is flawed in 3 areas:

1. (knowingly) without looking through viewfinder how can one knowingly photograph an intimate area.

2. (for the purpose of sexual gratification) The statute speculates as to one's intentions. I only meant to get a little laugh then delete it.

3. (expectation of privacy) When a skirt is worn 10-12 inches above the knee does one have a reasonable expectation of privacy going up stairs or sitting down. Male students testified that they see intimate areas daily. I didn't photograph anything that was not visible to the naked eye.

Thank You Gary A. Boyd