STATE OF WASHINGTON

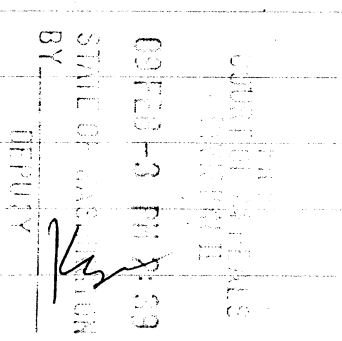
VS.

ANTWONN D. WASHINGTON

CAUSE # 06-1-01064-9

APPEAL # 36324-1-II

STATEMENT OF ADDITIONAL GROUNDS



55 pages
Accepted by DCP
as handwritten

Please Review Verbatim Report of:

State witness's / victims

- Travis Baide
  Volume 2 pg 62-131
  Volume 3 pg 189-207
  Volum 4 pg 378-385

- Eddie Dolan Volume 4 page 385-407

- Erin Gregory Volume 4 pg 418-464

- Shawn Bender Vol 5 pg 547-614

- Dalton Ramussen Vol 6 pg 662-701

- Erin Hoyke Vol 6 pg 703-724

Testify, Co-defendant / state witness

- Trisha Schnacken Vol. 3 pg. 220-329
- Jessie Copley Vol. 6 pg. 794 803
- Leslie Reed Vol. 7 pg 804-943

- Chris Blackwell Vol. 9 pg. 1089-1106

- Antwonn Washington Vol 9 pg 1107-1186

Please Review Verbatim Report for these issues

- Lawyer not present - Vol 1. pg 1-45
- Speedy Trial - Oct. 19, 2006 Motion for continuance
- Juror issues - Juror voir dire Vol. 2

Closing Arguments

- Murphy - Vol. 10 pg. 1226 - 1256
- Whitney - Vol. 10 pg 1257 - 1307
- Browne - Vol. 11 - Pg 1308 - 1396

- Disruption of deliberation process Vol. 12 pg 1397-140. (Ms Browne not present)
- Juror Questions & issues Vol. 13 pg 1404 - 1422
- Verdicts Vol. 14 pg 1404 - 1424
- Sentencing Vol. 15 pg 1425 - 1439
- Ineffective Assistance of Counsel (Sentencing) Vol. 5 pg 549-5. (June 22, 2007)
- Sentencing, Oct 12, 2007 Vol. 6 pg 561 - 586
- Abuse of Judicial discretion, Dec 14, 2007 Vol. 7 pg 587 - 600
- Erroneous Jury instruction on Presumption of Innocents, and Accomplice Liability - Volume 12 page 1397 - 1402 Volume 13 page 1402 - 1414

Recent Revialant Case's to support Claims & warrants Relief of this Conviction

Speedy trial issue: State v Iniquez, 143 WN. App. 845 (2008)

Summary: State complied with time for trial court rule, the defendants constitutional rights to speedy trial was violated by a 9 month delay between arrest & trial, defendant consistently requested a speedy trial while in custody

Sufficent evidence: State v Clinkenbeard, 130 WN. App. 552 (2005)

Summary: Impeachment evidence is not substantive evidence of guilt & is not, by itself sufficent to support a conviction

Right to a public trial: State v Frawley, 140 WN. App 713 (2007)

Summary Trial Judge excluded the public by conducting a portion of the jury voir dire in chambers without waivers from either defendants - (this case would apply to jurors not being present during witness invoking 5th admendment rights.)

Ineffective Counsel / Prejudice to client: State vs Horton, 116 WN. App. 909 (2003)

Summary Defense counsels performance deficient when he failed to impeach testifying victims with inconsistent statements, & failed to object when prosecutor argued that he personally believed defendant was lying.

State v Ward, 125 WN. App. 243 (2005)

Summary Counsel was ineffective for failing to request an instruction on a lesser included offense when there is not to & the evidence warrants it.

Ineffective Counsel: State v. Pittman, 134 WN. App. 376 (2006)

Summary — Defense Counsel failed to Request a lesser included offense Constitues ineffective assistance of counsel

Same Criminal conduct: State v Haddock, 141 WN. 2d 103 (2000)

Summary — trial Court Abuses its discreation if it does not Conduct a Same Criminal conduct analysis

Prosecutrial Misconduct: Discipline of Bonet, 144 WN. 2d 502 (2001)

Summary — Bribing witness not to testify for defense in Return for dropping Charges

Cummalative Errors: State v Johnson, 90 WN. App. 54 (1998)

Summary — A Conviction may be Reversed if Cummalative trial errors Reasonable materially affected the outcome of the case, Even if none of the errors individually warrent REVERsal

Accomplice Liability

Summary — State v Roberts, 142 WN. 2d 471 (2000) Reversible error to omit "to convict" instruction essential element. Accomplice Liability Requires that the person knows his Actions promote "the" crime committed, not Just "a" or "any" Crime; State v Cronin, 142 WN. 2d 568. (2000)

Summary — State v Gresadhi, 110 WN. App 905 (2002) Erroneous instruction Requires Reversal on appeal, State v Brown 147 WN 2d 330 (2002)

Summary — State v Johnson, 116 WN App 851 (2003) Burden of showing Erroneous instruction was harmless is on the state.

My conviction is based solely on the testimony of 2 co-defendants, who gave a very contradictory versions of what actually took place, the early morning of June 15, 2003, In these testimonys, both individuals testified that they never saw me with any weapons In my own testimony the most honest recollection of what actually took place, during the course of the night, I was never aware of any of these individuals plans to commit any crimes. I was merely going along with this group, to a neighborhood party, with individuals I believed to be good friends I was new to this community & looking to network with potential clients.

I did not personally know any of the victims. All I knew was the people I came to this party with, for it was my knowlege that the victims were friends of my newly group of friends. Unfortunately these individuals apparently had some sort of dispute & a young man lost his life. To this day its unclear why or what lead up to this. But with god as my witness I never had any association to committing such crimes.

I ask the courts to review the testimony of all the victims & witness's & surely you will conclude this crime was very senseless & only involved individuals who had knowlege of the victims drug operation/dealings.

Once shots were fired, I panicked & refused to retreat with the other suspects, so I was given a means to escape & I took it @ no time did I believe or consider I was inadvertantly taking part in the commission of these crimes. For all I knew the vehicle I drove was a friend of Mr. Rhodes

In the Verbatim reports of the victims & witness's you will discover that all the victims positively identified, (2) suspects, both males, both white or possibly Hispanic, but positively "Not Black". I antwonn Washington am a 250 pound Black male 5'9" in height, with a very distinctive posture, & practically blind without glasses, I've worn glasses since 1998. And I can't see very well without them especially in the dark or dusk of light.

MR Travis Bride was apparently the target in these crimes & when he first contacted the authorities he said, the suspects were white males - "NONE Black" (Verbatim report Vol 8 pg 1020) All the other victims & witness's gave similar testimony stating it was (2) suspects (2) guns.

In the words of the prosecutor MS. ERIN GREGORY was the most sober person of this group, & she testified it was (2) suspects both white - not Black.

This crime went unsolved for 3 years & never was a black male considered a suspect til the day of my arrest, I sincerely ask the courts to review these witness's testimony @ the time of trial & during the investigation phase, for many witness's testified that their original statements were the most honest statements they had given thru out this process.

Let's review the testimony of co-defendants / state witness's, for I don't ask you to asses their credibility what I do ask is that you consider their motive as to why they are giving contradictory testimony, in which they minimize their knowledge & involvement to protect the justice system.

Then we have Travis Bride, a then once lucrative drug dealer who surrounded himself with runners to move his product. This gentleman Never

Ineffective Assistance of Counsel: (Trial)

Upon my arrest, I refused to speak with detectives & prosecutors until I spoke with a lawyer. Once Mr John Henry Browne, signed onto my case, I requested he set up a meeting with **dectatives**. Mr Browne's position was we were going to proceed to trial, without speaking to investigators or prosecution.

Under the advisal of my Counsel I agreed to this. Upon our 1st appearance in Court, I advised the Courts I was unwilling to waive my speedy trial rights; the Courts agreed that I could waive my rights for 8 days - giving my Counsel time to adjust his other Court scheduled appearances. My Counsel along with prosecution agreed I was still entitled to my speedy trial rights - which means I would of went to trial 68 days after my arrest. This trial date was set but never honored by the Courts. The State continually requested several - continuance in which I expressed I wanted my case severed from Co-defendants & my speedy trial Rights upheld.

During my incarceration while awaiting trial, I seldomly spoke with my attorney. Mr Browne failed to return any of my Trial house calls, I gave him a list of pertinent witness to the case & my defense, which included my wife & several of my employees. These people were never

Contacted by Mr Browne on his firm's investigator. During the trial services, we discovered their was an Eye witness to the suspects descriptions. This person spoke with investigators, & told them the (3) suspects were white males. This eye witness seen them @ the service station, with the stolen vehicle the day after these crimes took place.

My lawyer again failed to speak with this witness. As of Oct. 19, 2006, I was scheduled for trial Oct 25, 2006 - My lawyer Appeared for this hearing & advised the courts that, "he had not done any investigation of states Witness's - because the state had not issued A witness list. The state responded by showing He faxed this list of witness's to Mr Browne's firm in April 2006. This was very disturbing to me, for I @ this point felt my lawyer was being very deceitful & withholding information from me, for I was still requesting a speedy trial - The Courts granted another Continuance against my will, setting trial to Feb. 20, 2007.

During this period I wrote the bar Association to ask them to intervene between me & my lawyers Conflict. The Bar Advised me to file a grievance, I also wrote letters to the judge: Honorable Rosanne Bucknen. Judge Bucknen, declined to address these letters. By January 14, 2007, 1 month prior to trial, I meet with my lawyer, & he advised me to seek a Continuance, because he "still" had not spoken to

Victims, Witness's for the state as well as for my defense. I again expressed I wanted to speak with the Judge, I was ultimately denied my Request to speak with the Judge.

I was contacted in Mid February by my Lawyer, who informed me he spoke with the victims & my co-defendants whom decided to testify for the state. At this point my lawyer, suggested we not Request a continuance - trial was to Commence on Feb. 20, 2007.

Come Feb 20, 2007, My lawyer was not present, he had his Office Assistant appear on my behalf. Ms Emma Scanlon, (Mr Browne Assistant) I advised her I did not want to proceed without Mr Browne, she advised the courts of my Concerns, And we proceeded to interview potential Jurors.

Feb 28, 2007, Mr Browne appeared "late" to court on my behalf, I spoke with Mr Browne about my Concerns & my displeasure with him not contacting very important witness's, mainly my wife & employees, in which they all had 1st hand knowledge of this complete case. Mr Browne, said not to worry for he will do this soon. Unfortunately this never happened.

During trial, Mr Browne was unorganized, frequently late & @ times not present OR available to assist ME OR advise me of my Rights.

The state began calling its witness's, & it became very clear Mr Browne had not spoken to several of them. For Mr Browne, began asking my

Co-defendant, George Scanlons lawyer, (Miss Helen Whitmen) for her interviewing Notes.

The State called a "Surprise" witness Jessie Copley to the stand, and Mr Browne stated he never spoke to Mr Copley, the courts informed Mr Browne, Mr Copley was on the witness list. By this time it was very clear Mr Browne was unprepared to Represent me of this case.

The first day of trial (Feb. 21, 07) Mr Blacknell, opted into taking a plea deal, for taking Responsibility for the Crimes committed. In Mr Blacknells plea deal, he agreed to implicate, other suspects intentions. This made him a witness against me. Mr Browne was not present this day - so I was not advised of my rights. Nor did he take this opportunity to interview this guy.

During trial Mr Browne, failed to uphold my rights of several Request to speak with the Judge.

He would state: "just sit there & look innocent," "let me be the lawyer & you be the client," Mr Browne was very unprepared for this case, He failed to uphold my Constitutional rights, he failed to object to several errors & Acts of misconducts, he failed to Advise me of my Rights & options. Mr Browne failed to advise me of any Plea deals from the state. (In which I discovered several months after trial.

During Jury deliberations Mr Browne again was absent, & had his Associate Emma Scanlon & Jessica Riley sit in for him. I again advised Emma Scanlon, I did not want to proceed without Mr Browne - my privately paid lawyer. Mrs Scanlon advised the courts, Mr Browne

was again not available because of schedule conflicts & other cases & pre-planned vacation. Thus leaving me with inadequate representation. During this deliberation of 10 days, several issues & questions were raised by the jurors, During this time I was forced to be represented by Emma Scanlon, in which whom I never spoke with about this case. Ms Scanlon would have to call Mr Browne to get his advise & opinions on what to do concerning a issue - It was very clear she was inexperienced in such a case. There was concerns with Court officers speaking to jurors outside the presence of lawyers, there was questions from Jurors, Ms Scanlon could not answer, there was @ several points, where the judge wanted to disrupt deliberations of "Ne" Emma Scanlon & I asked the courts not to disrupt the process - ultimately the judge interrupted deliberations. (Verbatim vol. 13 pg 1404-1422)

When the jurors returned verdicts, Mr Browne still was not present, several weeks after recieving the verdicts, I continued to write the judge & bar association for I had yet to hear from Mr Browne.

Finally Mr Browne appeared in court for the Sentencing Phase of this trial 4/11/07). At this point, I had not spoken with Mr Browne, since his last appearance in Trial Court, 3/28/07 this was 2-3 WEEKS prior to Sentencing. At this hearing I addressed the courts, asking to dismiss Mr Browne from My case & Allow me time to file a motion for a new trial (Rule 7.5) based upon, "NEW evidence" & "Ineffective Assistance of Counsel." The Courts granted this request & recommended to appoint me

A new lawyer. Mr. Robert Smith. (6)

All this information is supported in the Courts Verbatim Record.

Conclusion: Mr Brownes form of representation was very unprofessional & @ times prejudical to my defense for he failed to diligently seek out my defense, & evidence that favored me or against me. Mr Browne was very arrogant & his arrogance, ultimately denied me a fair trial, for Mr Browne was never concerned about my innocents or guilt, he was only concerned about his image, money acquired & his several other high profile cases. At 1 point he told me & my family - "Pay me my money or I will not show up in Court." Mr Browne, bullied me as his client & decieved us all into believing he's the Greatest lawyer of all time. Yet his actions & failure to challenge the states burden of proof, left me guilt til proven innocent.

As I've stated Mr Browne never advised me of my Rights during this process, all he told me was the states case against me was very weak, because I had no prior Criminal history. To this day I never waived my speedy trial rights. Again Mr Brownes Concern was only to Recieve the $65,000 my family made Available to him. For I never spoke with investigators on the state, concerning this Case til I took the stand during trial. The prosecution knew nothing about me, my defense & let alone that I had a wife & kids. My lawyer failed to represent me throughout this entire case. Thus denying & violating my constitutional

o.w.t.l

At the Conclusion of Closing Arguments. I was asked whether I was ok with Mr Browne not being present during a period of (2) days in which Mr Browne Advised me & the courts that he had other pre-scheduled hearings to Attend in Seattle, On Record I agreed to this (2) day absence, for I was never advised that I had the Right to disagree to this happening. But the record also shows that I Clearly did not WANT Mrs Riley or Mrs Scanlon, to represent me @ no time during Trial or deliberation, for they were to Just be present to advise Mr Browne of the progress of deliberation. Through out this entire process, from the time I was arrested to the time of deliberation, I never discussed my defense or case with these Associates, for I did not know them Nor Hired them

Several times during deliberation I advised Mrs Scanlon I needed to speak with Mr Browne, I wanted him to Return to court, because it was clear that Mrs Scanlon could not Address my concerns about the proceedings. Ms Scanlon constantly said, "she will have mr Browne call me or visit me, in which He did not - After March 29, 2007 the Conclusion of the states Rebuttal closing arguments I did not see or speak to Mr Browne again until May 11, 2007 @ my sentencing hearing.

I was ARRESTED March 2, 2006, I hired Mr Browne March 26, 2006, I NEVER waived my speedy trial rights. But trial was continued 2 times, I was Refused a bail Reduction & SEVERANCE from co-defendants, My lawyer contacted no witness's until 4 weeks before trial, in which I awaited 11½ months in incarceration. I sought intervention in all this only to be Prejudiced & ignored. This all happened as if I had NO lawyer

Mr Browne & I were having conflicts of interest beginning back as far as June 2006 - And I wrote the Judge & Bar Association

Mr Browne interviewed, states witness' on January 22, 2007, exactly 1 month before trial, this was the 1st & only interview Mr Browne on his investigation ever conducted for this case, surely he did not have anytime to investigate any evidence that came out of this meeting - this meeting was set up by the prosecution, because no investigations on my behalf had not yet been pursued, this was 11½ months after my arrest, in which I remained in custody since March 2, 2006. As I've stated, I gave Mr Browne an extensive lists of pertinent witness's, who was more than willing to testify on my behalf.

Prior to trial, no one from Mr Brownes office spoke with Jessie Copley - for the state interviewed him on February 7, 2007 & took his statement, this was the second time investigators had spoken to him since July 2003, in July 2003, Mr Copley denied any knowledge of these crimes & now in 2007, he was admitting to his involvement in the arson in exchange for no charges filed on his behalf, for in his testimony he implicates, me employing him to destroy the Tahoe, yet he says I burned it along with James Tyson, then his best friend Chris Blackwell paid him for his services - Truely this does not make sense, & my attorney should have interviewed this witness against me prior to trial. Then he could of presented evidence (a trial that would have impeached this witness's Testimony & several others. Being I was incarcerated awaiting trial I had no resources or reliable means to contact my own witness's to come forward & speak with my lawyer. I gave Mr Browne all their information, but he Reluctantly did not pursue this information.

Had my lawyer Mr Browne, diligently sought out my defense & spoke with my list of pertinent witness's. He would of spoken with my family Counselor, for in 2004, I sought out counseling for myself & my family to address, family & emotional issues I was enduring because of the mental anguish I was suffering from. I disclosed pertinent information to these Counselors concerning issues surrounding this Case. I explained there was some issues, I was afraid to disclose because of potential retaliation from the suspects. Because of my disposition, the Counselors wrote in their reports to the Department of Social Health services, that I was potentially suffering from P.T.S.D - Post Traumic Stress Disorder.

I made this information available to my lawyer & asked him to seek out speaking with these Counselors, My wife & the family courts, along with OSHS of my family lawyer. This information was very important, for it would of corroborated my defense & made clear to the courts as to why I did not come forward to the Police or proper authorities. For I was living in fear of my life & my family's life from the times these crimes took place up until I was tried for these crimes. Had my attorney sought out these truths, the state & jurys would have concluded I was not intentional protecting these suspects.

Although I never disclosed the details of these crimes to my family court lawyer & family/personal counselors. My ex-wife told them very pertinent information, that would of supported my defense & could have been used to impeach the testimony of the states witness & any evidence against me.

The eye witness that came forward & spoke with Dectatives, identified 3 suspects @ the Down-Town Puyallup gas station. This eye witness detailed the Description of the vehicles they drove & their deamnor. Apparently their actions were suspicious enough for this witness to come forward. Had my Lawyer spoken with this eye witness he would of acquired more evidence to impeach witness testimony & support my defense that I was not present with these individuals during the course of destroying this vehicle.

Had my Lawyer spoken to My employees they would have gave testimony to their 1st hand knowlege of Chris Blackwells & Travis Brindles friendship. They would have also testified to the facts that Sunday June 15, 2003 I was celebrating fathers day with my family. They would also have testified about the threats I was receiving from several associates known by Christopher Blackwell. These employees would have also gave testimony that Jessie Copley & James Tyson, came to my shop trying to sell me the stolen products from these crimes.

Had my lawyer interviewed James Tyson Mr Tyson, would have gave testimony that it was Chris Blackwell who contacted & hired him & Jessie Copley to strip, drive & burn the vehicle, Mr Tyson would have testified that He & Jessie went Boating on June 15, 2003 with Mr Scanlon & Mr Blackwell. This Testimony would have impeached Mr Copleys testimony. For it was Mr Tyson who was the 1st person to come forward to Authorities in July 2003

Had Mr Brownes Office Contacted the Travel lodge hotel in Portland oregon, they would of gave him a copy of my Credit card Receipt showing my check in & check out time on fathers day June 15, 2003

Had Mr Browne Met with my ex-Wife, she would have given testimony to her 1st hand knowledge of this incident, she would have detailed, Mr Scanlons communications to her about his involvement without my knowledge. She would of testified about the threats. She also would of testified that I had no plan or knowledge of commiting any crimes. She also would of testified why, she wanted me to go to Authorities, & why she had went into hiding & ultimately how these crimes destroyed our marriage - this information would have impeached testimony/evidence has brought against me.

John Walden is another important witness that was not pursued by Mr Brownes Firm, the information on testimony given this witness, was very important for he would of given pertinent information that would of been used to impeach the testimonys of Travis Bride, Jessie Copley & Chris Blackwell.

For John Walden is the owner of the Custom Car Audio shop, that sold & installed the Steno components in Travis Brides Tahoe. Mr Waldens shop is directly across the street from my bussiness. So He is very aware of my customers, bussiness & incidents arising from these crimes.

Mr Walden is aware of Chris Blackwell & Travis Brides friendship & source of income, for I met these individuals thru Mr Walden.

Mr Walden would have testified that it was Jessie Copley & James Tyson, who tried to sell the stolen steno components back to him. Mr Walden would have been very instrumental, in detailing the facts that Chris Blackwell & Travis Bride constantly fueded over money.

Mr Waldens testimony would have made it very apparent that I was not a Regular Associate of this group on any of their Criminal activities as well as detail the several incidents, where I was Approached by Hells Angel Bikers, whom made several threats against my bussiness & personal life. For it was discovered that this group was tied to Mr Blackwell & Mr Brides drug dealings & distrubution. Mr Waldens testimony would have Corroborated my defense that I had no knowledge of the Criminal activities of these individuals.

Jessica Nelson, would of testified that I was Never present @ Fred meyers, when Chris & George arrived to pick up Lesley & Trisha, the day that the Tahoe was burned.

Jessica Nelson would have testified to her knowledge that Lesley Reed & Chris Blackwell committed several other Home Invasion Robberies, for Lesley used to tell her everything.

Jessica Nelson would have also Identified Jessie Copley & James Tyson as being in Chris Blackwells, Blue Tahoe, when they picked her & the other Girls up from Fred meyers.

Jessica Nelson was another young lady who came down to my shop to do clerical work, for Jessica was a single mom, whom my Wife would baby sit her son while Jessica sought out permanent employement.

Jessica Nelson's testimony would of proven that I was unaware of this groups plans to commit these Crimes, for Trisha & Lesley frequently bragged about money they earned from Chris Blackwell.

Jessica would testify that Trisha Broke up with Chris Blackwell, because he would threaten to beat up Trisha for dating Josh may

Jessica Nelson is the friend of Lesley Reed & Trisha Schroeder - Verbatim Report Volume 4 page 853 Line 10-13

Jessica's testimony would of been about events on June 16, 2003

Erica was another good friend of Trisha Schroeder & Lesley Reeds & a former part time employee of mine.

Erica was the young woman who accompanied Trisha, Lesley & I to Apple Blossom in 2003. Erica had 1st hand knowledge about these communications between Trisha, Lesley & myself

Erica would of testified that I suggested we all go to the police together & report this incident but it was Trisha & Lesley who did not think that was a good idea - Because Lesley was afraid of what would happen to her, because she had admitted to us her & Chris planed these crimes without our knowlege, Erica would also had testified that Lesley & Trisha, was also Recieving threats from Mr Blackwells friends if they did not keep quite

Erica would testify that it was Antwonn who gave them money to go to Job Corp - because they were targets by Chris Blackwells friends / Travis Bride.

Erica's testimony would have proven that I only told these girls not to talk to me about these crimes anymore, because it was clear that they had prior plans in committing these crimes without me knowing, Erica would of told the courts that I became very angery with these girls & refused to Return back from Apple Blossom with them, because I felt they lied to me all this time. Erica was another good friend of Trisha's & Lesleys - for these girls frequently came to my shop for part time work. That was the basis of our Association.

Erica would also have testified that Travis Bride knew it was Chris Blackwell who robbed him, for Travis Bride, shot Chris Blackwell in the local Bar "Payapas" in Tacoma. Erica was best friends with Travis's Girlfriend

Erica would of also testified that Trisha & Chris Blackwell were dating & George Scanlon & Lesley Reed were also dating - I was just the guy who owned the Rim shop, & that was my only association to this group, I networked with them because they knew alot of potential customers. Please note Both Ms Schrodren & Ms Reed testified that their friend Erica, Drove "us" to Apple Blossom, when the details of

Please Remember the facts of testimony of these 2 female co-defendants.

For in their testimonys they testified that they continued to associate with Chris Blackwell after these crimes happened, after they Returned from Job Corp & after Chris Blackwell went to prison for other similar crimes. They went to visit Chris in prison with his Mother Connie.

I dis-associated myself with this entire group, because of the crimes they committed. From that point I lived my life in fear of what may happen if I did come forward.

I also made Mr Browne aware of a Puyallup Police Officer - (Mr Temple) who frequently came to my shop to talk about Cars, Puyallup etc. I informed Mr Browne that Mr Temple, was very aware of these individuals & Mr Temple had pertinent information about incidents that occurred @ my shop that Mr Temple Responded too. For Mr Temple, knew I suspected Mr Blackwell as a individual who may have broke in my shop, or encouraged other individuals to do so.

During trial, Mr Browne did not call any witness's on my behalf, for he continually said he would be calling witness's. In the trial Verbatim ( ) Mr Browne lead me & the courts to believe that he was going to be calling witness's.

Needless to say this never happened, its believed this was just another tatic on Mr Brownes behalf to get my family to pay the Remaining balance for his services.

2 days before my arrest. My house was broken into & several items was taken. It was believed that this event was another one of several similar events that occured in the past 3 years.

I made contact with the City of Puyallup Police & the Tacoma Police department. Because during this course of 3 years since June 2003, My business was broken into 2-3 times, my cars were vandalized or stolen & my home broken into 2 times. In all these events someone would call my phone or my wife's phone & leave threatening messages.

I advised my lawyer, that it was believed that Chris Blackwell was connected behind these events. When I spoke to police Investigators I told them about my suspensions, they filed their reports, but never made any arrest on these burglaries. Again I asked Mr Browne to go speak with these departments for they would of corroborated these facts. So because of these events, I was living in fear of my life & my families life, because of threats I was receiving from Mr Blackwell's circle of friends. This was all tatics he used to keep me from going to authorities. And I made a conscientious decision not to speak with authorities because my families safety was @ stake, even while I was incarcerated. Mr Blackwell by no means was no friend of mine. And it was my lawyer who failed to investigate my claims & adequately prepare or pursue my defense. So now I sit condemned because of someone else's illegal acts.

Mr Browne failed me as well as this justice system.

In summary My lawyer Mr Browne was either on vacation or unavailable during my pretrial services, My proposed Speedy trial date, the entire first day of jury selection & several days while trial was in session including the entire 10 days of Jury deliberation.

I sought to address these issue with the Bar association as well as the judge, only to be denied Relief or a resolution.

Had Mr Browne been available or present during these proceedings, he could of advised ME of my Rights, he could have addressed Jurors Questions & argued my position.

for @ one point when the jurors Returned the final verdict, they sent out a question to the Courts asking "If it was ok, for them not to agree on all the other charges." By the form of this question it was clear that the jurors were confused about their duty, the laws & the Prosecutors Instructions in closing.

The jurors felt compelled to bring back a "guilty" verdict because of several errors that occurred during trial, which includes, (but should not be limited to) the absentsence of my lawyer, the Prosecutors prejudicial comments & behavior as well as the disruption of the deliberation Process, & Juror Misconduct.

All these events denied me a fair impartial trial. for the jurors not only delivered a "Dynamite verdict," these verdicts were inconsistant with the law.

for under the accomplice liability law

the accomplice can be charged & found guilty of the laws that the Principle was also guilty of.

Being Christopher Blackwell plead guilty to the Robbery, Burglary, Murder & assaults.

The jurors should have also found the accomplices guilty of the assault charges as well. For it was the assault charges the Jurors could not agree upon. Making these Verdicts inconsistant to the law, For they never heard from Christopher Blackwell, Nor knew he took Responsibility for all the crimes.

But yet they agreed that I was guilty of possesion of a Firearm, because Mr Blackwell had a firearm. For all the witness's testified, I had no Fire Arm or Mask. Many testified they were either unsure of a 3rd person or didn't see a 3rd person. Given this erroneously vague instruction it allowed for the prosecution burden to shift to my Responsibility of proving my innocents.

It's also my belief the jurors felt I was guilty, because of the prejudical defense of my Co-defendant George Scanlon, For it was his defense that he went to this party to steal Mr Budes Vehicle, & not to commit any Robbery. This defense was prejudical towards me, because during trial, I was often grouped with these suspects or Referred to as "they" or Suspect #2. It was clear Mr Scanlons lawyer was implicating me in this criminal activities, & with that theory, I should have been severed from co-defendants

It has become very clear that these jurors was having issues with the deliberation process of laws as it was applied to each individual defendant, I believe because of my co-defendants actions & defenses, I was prejudiced to any defense, for just merely sitting in the defendants chair, these prejudice outweighed any evidence my lawyer could of brought forth - thus denying me a fair & impartial trial.

I put my life in the hands of this defense lawyer who swore to uphold my rights & diligently seek out my defense & evidence, only to be left abandoned & fighting for Justice.

I sincerely ask the appellate courts to thoroughly review this case & overturn my conviction because of the cummulation of all the errors & prejudices I endured during this trial.

EAC

In my letters to the Judge & several request I made to (20)
My lawyer. I Requested my trial be severed from the
co-defendants, for our defenses were very antagonist of
each other, causing 1 defendant to prejudice on other
for in defendant's scanlons closing argument his lawyer
was implying that I was armed with a gun on & was
suspect #2. This made Mr scanlon a witness against me,
had the Judge & lawyer honored my Request, I would have
avoided this prejudice - for I had 4 co-defendants
(2) of them took plea deals to testify as state witness's &
the 3rd person Mr Blackwell took a plea deal - invoking
his right to remain silent, the Mr scanlon comes to Court
& admits to his intent to commit a Robbery. All the while
I still insist, I had no involvement in planning or executing
these crimes. Surely to a Juror this looks very prejudical
towards me, but the actual evidence supports my defense
that I was not involved in these crimes, for I was just
in the wrong place @ the wrong time. I did not get
a fair trial & I believe my conviction should be vacated because
of the cumulative errors & ineffective assistance of counsel
I suffered @ the time of Trial.

The states theorie is we all were I group, but
its his witness's that have positively testified that I didn't or
seldomly hung out with this group - I should of stood trial
as an individual as opposed to a group.

In State v Canedo-Astonga (1995) the Appellate Courts stated, that a "Antagonistic" defenses conflicting to the point of being, "irreconcilable & mutally exclusive" may cause specific Prejudice.

This Court Ruled, that defendants may demonstrate Prejudice by showing, A Massive & Complex quanity of Evidence, making it almost impossible for the jury to seperate evidence as it relates to each defendant, when determining each defendants guilt. As well as a gross disparity in the weight of the evidence against the defendant.

In this case @ hand, Mr Scanlons defense was antagonistic towards my defense, for we both were joined together during trial facing charges under the "felony Murder Statue". Mr Scanlons defense was prejudical towards my defense, for he was claiming it was a common scheme to steal Mr Brides, Chevy Tahoe, but not committ any murder. In Regards to my own defense, My defense has been, I had no common scheme, intent, plans or knowledge that any crimes were to take place. (Verbatim Report Vol 10 Pg 1257 Line 4-10)

Mr Scanlon through his lawyer admitted to his participation in the crimes, but claimed he was not responsible for the Murder. This made his defense irreconcible & Antagonistic to my defense. For I did not share this same Criminal intent. Futhermore the Evidence supports the facts that the suspects were (2) white males & possibly a 3RD suspect who was believed to be a female, none of the victims positively identified a "black" male. Their was eye witness & video surviellance photos that clearly caught the pictures of 2 white males Mr Scanlon & Mr Blackwell, this eye witness notified Police that @ this service station, he encountered (3) white males with (2) Chevy Tahoes with fancy wheels. In the police Photo line up, state witness Jessie Copley & James Tyson both Identified, Christopher Blackwell & George Scanlon, Antwonn Washington was never identified. My testifying Co-defendants / state witness's both stated it was Mr Scanlon & Mr Blackwell who they saw with guns upon Returning to

They further testified that it was Mr Scanlon & Mr Blackwell who divided the proceeds from these crimes. And then days later came to their aid when they needed the guns removed from their car. It was the testimony of both Mr Blackwell & Ms Schrodrin that "Antwonn Washington seldomly hung out with this group."

This is all pertinent evidence that described my association to these individuals. Had our trial been seperated the jurors would not have observed the prejudice I endured by standing trial & Accused of the crimes these individuals were taking responsibility for committing. Futhermore the state has the duty to instruct these jurors that a co-defendant taking a plea deal mid-trial, should not be viewed as evidence of the other co-defendants guilt (United States v Washbaugh (1971)

It is also my claim that my lawyer was also ineffective in not moving the courts to sever my case from these co-defendants for his representation was deficient, & left me prejudiced by the defense of these individuals. For my own involvement or "lack of," was not being assest on an individual basis, it was being determined by the credibility of the testimony of several co-defendants, who was doing & saying anything to get Liency for their actions.

Final Conclusion:

Mr Brownes Representation of my case was very deficient & prejudicial towards me, because had Mr Browne diligently sought out my defense witness's they would of given an enormous amount of pertinent evidence about the circumstances surrounding this case. There was ample evidence that would have contradicted, the conflicting testimony of the states witness's & the circumstantial evidences.

Had Mr Browne sought out this evidence, the state would have concluded, I was a potential witness to these crimes rather than a suspect. For @ the time of my arrest, It was my position not to speak to the dectatives or prosecution until I was counseled by a lawyer, once this lawyer Mr Browne signed onto my case It was my position & Request to Met with the state, to give my testimony of what actually occurred, during the course of these crimes. Yet my lawyer was neither concerned about my defense or my Request to meet with the state. For Mr Brownes, sole motive was to Recieve the $35,000 for his services. Once he Recieved the 1st $20,000.00, for pretrial services, he became unavailable to me & the courts - going on vacation & not being prepared for other scheduled court appearance. Between March 26, 2006 - January 20, 2007 No victims, witness's or co-defendants were interviewed by Mr Brownes firm, No defense or evidence was being sought out on my behalf.

Once I realized this, I sought to seek assistance with helping address these concerns, from the bar Association & the Judge Presseling over this case.

Mr Brownes was so deficient, for it left me defenseless @ the time of trial. Surely other courts have Ruled that a lawyer who's, frequently unavailable, unprepared

& Constantly absent during Pretrial & during trial is deficient, for Mr Browne on several occasions substituted his representation as my counsel, with the Appearance of his office associates / Assistance. Emma Scanlon & Jessica Riley were never employeed as my Court counsel, & I made this very clear the 1st day of trial Court. For I never met or discussed this case with them & furthermore they were not present during the commencement of Trial, so they were ineffective of standing in for Mr Browne, during the deliberation Phase of this trial. These ladies, were not aware of the Rulings or circumstances & testimonys of any witnesses during trial.

Having Mr Browne as my Lawyer, was the same as being without a Lawyer, for I was not aware of my Constitutional Rights - or Counseled as to the Charges I was facing. I put my life & interest in the hands of a Lawyer who was only seeking monetary gain. Sincerely that is the only crime Im guilty of, & it's now my Request that the Appeallate Courts vacate my Conviction, based upon ineffective Assistance of Counsel & several other prejudiced errors that occurred during trial.

At the Conclusion of this trial, I was finally allowed to address the Courts, it was then, that I went on Record to say everything I had been complaining about since August 2006. My Question to the appeal courts is what is one to do, when you put your faith in a Lawyer & that Lawyers interest is not the same position as his client? Mr Browne interest was $35,000 that some how, arose to the final amount of $65,000.00. The facts are somebody else, took responsibility for killing Josh may - And yet I've still been condemned as his Killer. I do understand & Respect the law, but that does not make it Right. For the state & all it evidence still hasn't proven beyond a Reasonable doubt, that I was an accomplice to these crimes. Had my Lawyer diligently sought out

Amount of evidence, to challenge the state's evidence.

Mr Bride & Mr Blackwells, ability to invoke their "Right to Remain silent," outside the presence of the Jury, was so prejudical towards me, for it allowed them & the state to conceal important evidence that these (2) individual knew each other & that I had no knowledge of any crimes being planned. Their testimony would of attested to their Credibility - By not challenging their Credibility, how does the Courts access what is the "Truth".

If we Cant access what the Truth is, how can the jury convict others beyond a Reasonable doubt? These are all the things I ponder on a daily basis in Person. The only Conclusion I come to is, they were impartial, unbias & Wrongly instructed as to what the law is. The Charges I am Convicted of are very serious Charges, and I believe a prior history would have to show how these acts escalated to the Commission of these crimes. I myself did not have a prior felony Criminal History. With being absent of this history. I believe "Character" plays a large factor into being Jailed for such Crimes. Needless to say - My Lawyer never sought out any Character witness's on my behalf. For there was an abundance of professional & personal witness's to his disposal.

Had he sought out this evidence the jury could have been Equiped with a clear contrast of the actual facts Surrounding this case. Yet because of Mr Browne's deficiency's as my Counsel, they only weighted prejudical Erroneous evidence against me. Given by individuals who had an enormous amount to lose, for their involvement.

As Lesley Reed, stated, "she would say anything not to go to prison for the Rest of her life." A person who says this is ultimately given Testimony as to her credibility. Just as a jury who deliberates for 9 days & expresses issues with deliberation process

duty of the Judge is to make clear the law & Assure the deliberation process is free of any impartialities such as "media material" & evidence or communications out side of the courts. Any of these prejudical factors that are advertiantly or inadvertiantly allowed into the courts should never be viewed as harmless Error.

For in the reality of our world, we know that Jurors are going to read & discuss their views & knowlege of the Crimes set before them - as well as "Goggle" media's perception of the Crime @ hand. So with sayin this, I know the Jurors were tainted with the media's Reports on this case, for their is nothing in the media that suggest I was innocent or not knowing the Crimes were going to take place. Quite contrary, their knowledge & circumstances of the case comes Directly from the prosecutors office.

My point being, when the Daily New Tribune News paper was introduced into the Courts, the Jurors should have been dismissed for potential prejudice, not one juror - All of them, for how do we access whether they were being Truthfull about whether they read this paper - And Im positive after this event they later in the day - did Read the Paper, Causing them to Violate their oath & Rendering them biased to any defense presented. But being their is no absolute evidence of this, we can't positively conclude this as facts. So what the Courts has to do is look @ the behavior of the Jury & the Representation of the defense attorney, but if he's deficient in thoroughly representing & pursueing evidence to prepare his case, then what are the Courts Really looking for other than his current display of his deficency - any deficency's on his behalf should be consider prejudicial, expecially when he fails to challenge potentially unpartial Jurors on a Juror who says he can't be partial.

Mr Browne's Representation was prejudicial, because he failed to represent me or Counsel me about my rights as well a failing to challenge the states Evidence or any prejudices I endured during trial.

He was absent on several occassions, but even when he was present in court he was still absent of presenting or preparing any defense for me his client. He was merely present, to present the appearance that he was counseling me of the proceedings. And this is a fact if you consider the manner in which he substituted his presence with the presence of his associate, whom was not present during the progression of the trial - Mr Browne felt he was just required to supply any one to sit beside me during trial, in order to obtain the funding he required. He was never concerned about my innocents or guilt. This lawyer was deficient beyond reasonable doubt & I again ask you to vacate my conviction.

In (State vs Jury, 19 Wash 256, 263, 576 P.2d 1302 1978) Courts have ruled a lawyer is deficient, if he failes to investigate factual or legal defenses or sufficiently investigate the facts to discover defenses.

Counsels faulure to investigate & present potentially exculpatory evidence is Prejudicial

In (Re Pers. Restraint of Davis 152, Wn2.d 647, 721, 101 P.3d 1 (2004)) the Supreme Court noted that an attorney breaches his duty to his client if he fails to make Reasonable investigations or to make a Reasonable decision that makes particular investigations unnecessary

The 6th Admendment to the United States Constitution GUARANTEES "in all Criminal prosecutions, the Accused "shall enjoy the Right ... to have the Assistance of Counsel for his defense." Our state constitution similarly provides, "in Criminal prosecutions the Accused shall have the right to Appear & defend in person, or by counsel" Const. Article I Section 22. A Criminal defendants Right to Counsel is, in addition to a "Right" to have Counsel Appointed, a right to meaningful Representation. According to, the Right to Counsel is the Right to effective Assistance of Counsel"
McMann v Richardson, 397 U.S. 759, 771 N. 14, 90 S. CT. (1970)

Mr Browne's failure to investigate & prepare the defense case did Prejudiced me. With these errors & the deficient performance of this lawyer, I was left defenseless to these charges @ the time of trial

Other Courts have Ruled:

Counsel must under take sufficient, Investigation to subject the states case to a meaningful adversarial test. (State v. Strickland, 466 U.S. @ 696)

Failure to develop a defense theory or investigate the states evidence to be presented @ trial can not be justified As a strategic decision, (State v. Henderson)

Defense Counsels failure to Adequately interview witnesses or investigate the facts may fall below the Standard of Reasonableness, (State v. Visitacion 1989)

Performance is deficient, if Counsel fails to investigate factual or legal defenses or sufficiently investigate the facts to discover defenses.

Lets not forget Chris Blackwell got 38 years with good time for his admission of guilt for Killing Joshoua May.

Chris Blackwell was already in Prison for other similar Crimes - for he was a career Criminal

I Antwann Washington never had a felony Criminal history, I never Killed anyone nor benefited from these Crimes & I Recieved 45 years (520 months) for the Juays Verdict of guilt.

Please ask yourselves, what would you do if you were charged with such crimes. Would you plea to something you didnt do - or would you trust in the American justice system to prove Youre innocents.

Sadly to say I trusted in the Judicial System, that was set in place, for my fellow American Citizens, & that system thus far has failed me & my family - So whose Really the victim? As I said before, my heart really goes out to Josh May & his family & hopefully 1 day they will be able to forgive everyone involved in these crimes.

Im left to wonder whose gonna help my own 2 children get over their loss. for they know their daddy didnt Kill or Rob anybody.

Wheres the equal justice for them, How do I advise them to trust in the law if the law has failed me. Further more, because the law says one thing - does that make it Right? I Killed no one, I never fired a gun @ anyone, how can I be a Murderer? How can this system condemn me to life in Prison, 45 years from now I will be 76 years old - Nobody in my family has Lived past 65 years old, I will die in Prison for Mr Blackwells actions!

I Ask this court, to review the Guarantees of our united states constitution. With all the facts @ hand please dont overlook the 14th Admendment which guarantees, equal protection under the law.

Surely its conclusive that I was not equally or fairly treated by those who swore to uphold the laws of our land. These facts alone warrants Relief from this conviction.

Violation of Constitutional speedy trial Rights

I was Arrested on March 2, 2006, I was formally arraigned on March 6, 2006. My lawyer John Hencery Browne was hired on March 26, 2006, My speedy trial date was set for May 2, 2006. My lawyer MR Browne attended my omnibus hearing on April 27, 2006, @ this hearing my lawyer notified the courts, that there was a schedule conflict, with the purposed trial date of May 2, 2006, for MR Browne was going to be on vacation during that time, So he Reccomended the courts delay my speedy trial until May 8, 2006, in which he advised the courts he would be fully prepared for trial. I informed the courts I was unwilling to WAIVE my speedy Rights. The courts advised me that she would allow for the 6 day extension, all the while the judge Rosanna Buckner assured me, I would still be entitled to my speedy Rights. As time passed, the May 8, 2006 trial date was continued, on the basis that my co-defendants were not Ready for trial. I continued to invoke my speedy trial Rights & object to the continues. Thru my lawyer I Sought a severance from my co-defendents & a bail Reduction hearing. This hearing took place on May 18, 2006. I Requested a Reduction in bail or a Realease on my own Recognance, for it was clear the state was not prepared to proceed to trial. Judge Buckner denied this Request, on the basis of the Prosecutors Arguments that because of my previous criminal history, I was a threat to the community. When the true facts are, I had no criminal history & several support within my community.

My lawyer MR Browne appeared @ a trial Readyness Conference on May 25, 2006, @ this point trial was postponed until October 25, 2006, by the Request of co-defendants lawyers advising the Courts they were not Ready to proceed, It was also the Request of the prosecution to continue these proceedings for [illegible] I requested again that my lawyer

seek a severance from these co-defendants & invoke My Right to a speedy trial. Needless to say, Judge Buckner again allowed the continuance against my objections

Dureing this extended period, My lawyer advised me that he had conducted the neccessary contacts, needeed to suppoant my defense. My lawyer continually assured me that we were not going to agree to any more continuances as well as seek out a severance from co-defendants.

In June of 2006, My lawyer & I began to have some serious issues for he began insisting that my family pay him the remaining balance for trial services. Because I was refusing to pay Mr Browne until trial was to began, Mr Browne began to ignore my phone calls & several request to meet with him. At 1 point I asked Mr Browne to arrange a meeting with the State Prosecutor, for I wanted to negotiate some sort of plea deal. Mr Browne stated he was not going to do any plea negotiations until he was paid for trial services. At this point I began writing letters to the bar association & Judge Rosanna Buckner, asking them to intervene between my lawyer & I. I continually asked the Judge to uphold my speedy trial rights.

I informed Mr Browne I wanted to "fire" him. Because it became clear that Mr Browne, was not working on my case. I again wrote the Bar Association about Mr Brownes behavior. For Mr Browne was now threatening not to show up in Court, If we didnt pay him the remaining balance. I made Judge Buckner aware of this conflict, but was ignored.

Mr Browne then appeared to Court on Oct 19, 2006 informing My family & I, that he was prepared for trial on Oct 25, 2006, & we were not going to agree to any continuances & this point my family gave Mr Browne

Mr Browne then went into the court & advised the courts that I was unwilling to agree to another continuance & I was invoking my right to a speedy trial.

The states position was that my co-defendants were not prepared to proceed to trial, so it was their position to request another continuance, Moving trial dates to February 20, 2007.

I objected to this request citing, my lawyer & I was fully prepared for trial & a severance should be granted.

Mr Browne advised the courts that although I was requesting a speedy trial, the State has failed to provide his office with a potential witness list.

To My surprise, the state responded by showing that Mr Brownes firm received this information back in April 2006. The Prosecutor advised Mr Browne that he would arrange a conference with these individuals for it was Mr Brownes claim that some of these witness's was hard to locate.

Mr Browne then informed the courts that he would be ineffective in representing me if he did not conduct these interviews. (Verbatim

This all come as a surprise to me for Mr Browne had previously said he was prepared for trial, its apparent that this was just another tatic to get money he had yet earned, while allowing the state to violate my rights & build a case against me. At this junction of the proceedings, my co-defendant nor Jessie Copley had not agreed to any plea deals with the state.

I again objected to this continuance & the Judge granted it any way. Setting trial to Feb. 20, 2007

It was @ this Oct 19, 2006 hearing, I, thru my lawyer Requested another bail Reduction Hearing, The Judge granted the hearing, informing Mr Browne to notify the Court Clerk of the purposed hearing date,

Needless to say, Mr Browne never scheduled this hearing, And became unavailable to me & my family until the end of Jan. 2007.

To silence me from Addressing my issues with Mr Browne, he continually ignored my Jail house phone calls & Request to meet with him.

Mr Browne's performance was so deficient I wrote the Judge & the bar Association on several occasions during this period asking them to intervene for it was clear Mr Browne, was not effectively Representing me. And I wanted to "fire" him.

As I discovered in mid-February mr Browne had not spoken or sought out any of my witness's to my defense & further more he again began to Request additional funds to conduct more investigations.

Mr Browne's Representation was prejudicial towards me because he failed to diligently seek out any plea negotiations on my behalf OR investigate my witness's & evidence to my defense,

Futhermore his lack of upholding my Rights, denied me due process of the laws as well as allowed the state to build a case against me,

For As I stated, my co-defendants did not make Plea deals with the state until Oct 24, 2006, this was done while we all were incarcerated well over our speedy trial date / 8 months of incarceration

Conclusion:

Had the courts upheld my rights, I would have not sat in Jail awaiting Trial for 11 months, I would have had my case severed from my co-defendant, who @ this point had not agreed to turn state WITNESS's, I would of been able to locate pertinent witness's to my defense, as well as replaced my ineffective Assistance of Counsel. Im not just claiming the courts violated my speedy trial Rights, for they also allowed the state to fabricate false Evidence against me, while building this case against me. Its very clear these officers of the courts were biased against any defense I may have presented. For I was being treated as if I was guilty until proven innocent - and my lawyer was failing to uphold or advise me of my Rights - which ultimately denied me a fair trial & should be grounds to grant me Relief from this conviction.

Please Refer to the October 19, 2006 Verbatim Report in which my Lawyer, Advised the courts I was unwilling to agree to another continuance, I was Requesting a speedy trial. It was @ this point I learned my lawyer had failed to speak with any of my witness's as well as the states witness. At this juncture my co-defendants had not taken any plea deals & my lawyer was unwilling to speak/work with the state.

This communication should show that my lawyer & I was having several conflicts with the direction & progress of this case, although the Record does not show I made the courts aware of this conflict. I had been writing this Judge frequently, asking her to intervene & sever my case.

Case law that would be opposite for these matters 6
I claim are:

When delay is caused by a co-defendant joined by the government, a delay is generally Acceptable except when the Accused demands a speedy trial. (UNITED STATES V. Gammond, 137 F.3d 823, 828-29 4th CIR 1998) IN that case "A defendant's invocation of his 6th Admendment Right to a speedy trial... would trump" the policy of joining the trials of defendants who are indicted together. Id at 828 This is the same case here.

Violation of speedy trial, is Major Prejudice to defendant Corrado, 94 WN. App. AT 233 (citing Higley, 78 WN APP @ 185 Citing MOORE V ARIZONA, 414 U.S. 25, 26, 94 S. CT 188, 38 L.ED 2d 183 (1973)

STATE V JNIGUEZ NO. 25218-3-III (WASH. APP DIV 3 04/08/2008

Many courts have held that an 8 month delay in trial procedures while a defendant is incarcerated is presumptively prejudicial. UNITED STATES V. Beamon, 992 F.2d 1009, 1012-13 (9th CIR 1993), (UNITED STATES V. Vassell, 970 F.2d 1162, 1164 (2 CIR 1992) found a general consensus that a delay of 8 months is presumptively Prejudicial, Division 2 Courts found that a delay of 11 months was also presumptively Prejudicial, Corrado 94 WN. App @ 233-234

CrR 3.3(B) Requires that a defendant in custody be brought to trial within 60 days of the commencement date of action. The commencement date is the date of arraignment which in this case was March 6, 2006

A Criminal defendants right to a speedy trial is guaranteed by both

Improper Ex-Parte Communication with Jury
Juror Misconduct

The 6th & 14th Admendment to the United States constitution & Article 1, section 22 of the Washington constitution guaranteess the right to a trial by impartial Jury

During 9 days of Jury deliberation, Jurors spoke with Judicial Assistantce outside the presence of other jurors & the defendants as well as the counts. At one point Juror # 10 Requested to speak with the Judge, because of issues he was having with deliberation. This juror along with several other Jurors began making threats, that if not afforded this Request, he would not Return to court. At this point the court Bailiff, began speaking with this Juror about his issues. This bailiff took it upon himself to try & resolve this Jurors issue. Its very unclear of what actually was said to this juror, for this juror began speaking with other court Bailiffs, then became very adamant that he wanted to speak with the Judge.

The other courts bailiff advised this courts bailiff that Jurors were coming over to her discussing deliberation issues. The Bailiff notified the Judge of this jurors Actions, & Admitted that he had communication with Jurors outside of the counts of record.

At this Present time, my lawyer John Henry Browne was not present in court. For this jurors Actions continued on for another 3 different occassions. It became the position of the courts to inquire of the Jury as to what the issues were.

It was my position that the courts not disrupt the current deliberation process. Against my Request the trial courts had impermissably invaded deliberations by questioning the Jury. The court focused its concerns on potentially losing a deliberating Juror, in this manner it appears that a juror may be Reconstituted in order to Reach a particular Result. Due to this courts Actions, the guarantee of a fair trial & impartial jury is meanless to a defendant & Creates unwanted mistrust of the courts. Deliberations should have never been disturbed & this Juror of Judicial

Misconduct of Juror # 10

Please Refer to Volume 2 page 77 Line 4-9 (2)

In the prosecutions own words, he described Juror # 10 as being a hostile juror, for this juror was having issues outside the record

It was clear he did not want to sit on this jury panel because of time restraints, so its very clear that he began to become hostile towards the courts & then later on in the proceedings, he began speaking with others outside of the courts deliberation proceedings as well as stating "he was going to walk out & not Return" its clear @ this point this Juror was affecting the deliberation process, It's possible that his actions forced a "rushed" decision on behalf of the Jurors, for the courts should have severe polled the jurors - because of this one jurors actions, if any thing was to be done, the courts should have allowed the jurors to continue deliberating or Replaced Juror # 10 with one of the alternate jurors. Juror 10 was also known as a Retired LA Police officer, which means he was aware of the laws, so his influence & actions, could have been prejudical towards several other jurors decisions - for @ 1 point he told the bailiff - that the other jurors were just Rehashing the same issues - clearly he was frustrated with the process.

In verbatim report page 53 Line 25, this juror says, " Due to his hardship, he can't sit on this panel & impartially weigh the evidence presented

Pg 606 & 607 of verbatim Report volume 3, he again states his hardship would affect his duty as a juror.

Pg 76 Line 7-17 Volume 2, this Juror again spoke to another Judicial Assistant outside of the court & defendant

Verbatim Report Vol 13 Page 1414 Line 11 April 9, 2007
Verbatim Report Vol 14 page 1404 - 1424 April 10, 2007

This Juror has demonstrated his Actual bias by stating

Juror Read Case in Daily Paper

ON the - day of trial, during a brief Recess in the trial proceedings, Sent how the daily News tribune NEWS paper, was discovered in the Jury Deliberation Room. In this paper was a 2 page article detailing the States theorie of this case. The Article was very prejudiced towards me & my defense. Several jurors Read & had access to this Article, for it was one of the jurors who brought the NEWS paper to the Courts attention.

This juror openly admitted that he Read the article but was unsure of how many other Jurors read it. The Court failed to uphold my Request to dismiss all the Jurors, for it was the Courts decision to dismiss the juror who admittedly admitted he read the article.

When Questioned by the courts how the paper got into the jurors deliberating Room, it was the Court Bailiff who admitted that he purchased the paper along with donuts & coffee for the jurors & placed them in the deliberation Room. Clearly this is improper behavior on behalf of the bailiff & may have cause EXTREME prejudice towards the defendants, for in this article, the Journalists had a very 1 sided impartial version of this case.

The Courts Should have dismissed these jurors or granted a mistrial. For these Jurors were now tainted by Extraneous evidence

Conclusion: Because of the potential prejudice to the defendant the Judicial Assistant should have never have communicated with the jurors outside the presence of the defendants & Court.

The Judge should never have disrupted the deliberation process either, for these Jurors as a whole showed no signs of being deadlocked or hung.

It was clear that Juror # 10, was having an on going issue with the deliberations - for in his own comments to the Judicial assistant he said, "they are just continuing to rehash the same issues over & over", It was clear that there was some issues with the sufficiency of the states evidence by this juror or other jurors. By the courts ingnoring this Jurors request to speak with the Judge, only inflammed his actions, to the point that this Juror began speaking with other Judical assistances outside of this court & panel of Jurors, leading him to threaten not to return to deliberation.

If the courts was to intervene the courts should of allowed this Juror to leave on his own terms or be replaced by an alternate Juror. But by no means should the entire panel of jurors been dismissed. Previous courts have held that in situations like this with potential hostile jurors & ex-parte communications, a full evidentiary hearing is required for the circumstances surrounding the juror communications, the contact with the judicial assistant & Jurors & the trial court communication with the panel of Jurors during deliberation.

Without doing this evidentiary hearing, this denied the defense the opportunity to investigate or present a complete factual record or assesment of the situation. This error can not be presumed harmless error. For it's unclear if this jurors actions were affecting the entire panels ability to decide the merits of this case without the prejudicial influence of others. (State V. Johnson, 30519-4-II (200

Because of these many acts of errors, this panel of jurors & Trial court denied

(5)

Previous courts have held that: A bailiff is forbidden to communicate with the jury during deliberation except to inquire if it has reached a verdict, or to make innocuous or neutral statements.

(State v. Booth, 36 WN App. 66, 68, 671 P.2d 1218 (1983)

Once the defendant raises the possibility that he was prejudiced by an improper communication between the court & the jury, the state bears the burden of showing that the error was harmless beyond a reasonable doubt (State v. Bourgeois, 133 WN.2d 389, 407

when a judge delegates part of his or her official duty to a bailiff, such as during the deliberation process, the bailiff is the judges agent & is subject to the same restrictions as the courts Regarding Conversation with the jury. Although the judge is in charge of the jury, the bailiff is viewed by the jury as speaking on behalf of the Judge

(Adkins v Clarke County, 105 WN.2d 675, 678, 717 P.2d 275 (1986,

on this matter please refer to the rulings in:

(1) State v Bourgeois (1997)
(2) State v Johnson, No. 30519-4 II (2005)

CrR 6.7(b) states; the court officer shall not, before the verdict is rendered communicate to any person the state of the jury deliberations or their verdict, The officer shall keep the jury seperate from other persons & shall not allow any communication which may affect the case to be made to the jurors, nor make any himself, unless ordered by the court, except to ask jurors if they have agreed upon their verdict.

Prosecutorial misconduct, insufficient evidence,
erroneous Jury instruction

The prosecution in this case, had insufficient evidence to support my conviction on his theme to these crimes Charged.

Prosecution has to burden of proving every element of each crime, with support of the evidence beyond Reasonable doubt.

Prosecution sought to obtain my conviction by erroneously instructing the jury on the Accomplice Liability laws, the Presumption of innocense & benefit of doubt. Along with Prosecutions unethical tatics to withhold, pertinent witness testimony & evidence from the jurrors, his actions & comments ultimately denied me a fair trial, my constitutional rights to Due process & to face my accussers.

Instead of focusing the jurors Attention on the elements of the crimes & state the burden of proof, the prosecution resorted to his own ill-conceived opinions of the law & the presumption of innocents.

The supreme courts have previously said "If prosecutors are permitted to convict guilty defendants by improper, unfair means, then we are but a moment away from the time when Prosecutors will convict innocent defendants by unfair means. (State v Rivers 96 WN App 672 (1999)

The prosecution is an administrator of Justice, an advocate & an officer of the court, the Prosecution is to seek Justice, Not to merely convict.

On the Prosecutors closing arguments the prosecution commented on My Credibility by stating: "Mr Washington is blatantly trying to protect his friends who committed these crimes."

With instructing the jurors on the presumption of innocents: prosecution stated," The defendants don't deserve the benefit of doubt, or shadow of doubt." (verbatim report Vol 10 pg 1242) At this point My attorney motioned the courts to grant a Mistrial - based upon Prosecutorial Misconduct citing; State v Warren (2006) in which the courts have said "The presumption of innocents, is the same as the Benefit of doubt" On the Federal case of, Conley vs United states, the Court have ruled the benefit of doubt is the same as the presumption of innocents. No Presumption of innocents is a denial of due process, which is a constitutional guarantee.

With these comments alone, the motion for a mistrial was warranted & should have been granted. For prosecutions actions were reversible error, as well as prejudicial.

For a prosecutor to comment on my credibility & his belief of my guilt out side of the evidence presented in trial, is a tatic to prejudice me, regardless of the states burden to prove the elements of the crime

Prosecution gave a very Vague & Erroneous Accomplice Liability instruction, which was used to shift his burden of proof of the elements of each crime Charged.

In State vs BYRD (1995) the courts have Ruled that this type of instruction Requires Automatic Reversial.

The courts have held the "to convict instruction", on an accomplice liability theory Requires proof that for each of the crimes the alleged accomplice had "knowledge" that his actions would promote or facilitate the commission of "the" crime charged (State vs. Roberts (2000)

RCW 9A.04.100(1) says, every person charged with the commission of a crime is presumed innocent unless proven guilty. No person may be convicted of a crime unless each element of such crime is proven beyond a competent evidence beyond a Reasonable doubt.

The Roberts & Cronin cases have held that for an accomplice liability to apply, a defendant must not merely aid in "any" crime, but must knowingly aid in the commission of "the" specific crime charged (STATE v Cronin (2000)

The state shifted this burden of proof by Erroneously instructing the jurors on the laws of Accomplice liability & the burden of proof, while merely stating his opinions & beliefs of my guilt & credibility. The prejudice I suffered during this phase of the trial, could never have been dissolved of by any curative instruction

Once these crimes took place, it all happened so fast & because of my intoxicated state, I really didnt know what was going on @ the time.

I really didnt know what was going on, but I thing I was sure of is that I was not part of any scheme to commit any crimes.

So when I encountered Mr Blackwell out side of this residence, he told me, "he thinks he shot someone," I wasn't to sure of what really happened, but I knew I didnt want to get in the car with him or Remain @ the residence - for fear of my own life - so Mr Blackwell gave me the keys to his friends truck & I fled the scene, then abandoned the vehicle several blocks from my home, which was in the same area as Mr Blackwells. I did not want these people coming to my house - I was in a panicked state of mind & afraid of what may had happen. It wasn't til 2-3 days later I discovered someone had got shot & killed this night, by then I had people making threats against me going to Authorities. I once believed in the justice system, & believed they would catch these individuals @ no time did I Knowly Know my actions would make me a Suspect or Accomplice to these Heinous Crimes

The state has failed to prove that I was an accomplice to these individuals on crimes. RCW 9A.08.020 defines accomplice as: A person who solicits, encourages, requests or command another person to commit a crime, or Aids or agrees to aid another in planning or committing a crime with knowledge that it will promote or facilitate the commission of the crime.

There was no "positive", evidence that would statisfy the elements of this statute, for the state bases his theory of evidence on the contradictory, perjured testimony of (2) Co-defendants

Also please pay close attention to Co-defendant/state witness Trisha Schrodrens (pg 220-329) testimony. For she also gave her recollection of these crimes, based upon her, veiw point & knowledge.

Surely you will discover that her testimony along with Leslie Reeds was very contradictory to the actual facts & evidence of this case.

Surely, these co-defendants had several reasons to lie about their involvement & minimize their actual knowlege of what really happen.

For in both their testimonys, they stated, they never positively seen me with any gun. Might I add these girls also confided in me after the crimes happened & I told them I wanted nothing to do with the crimes or the person's who committed them. This was because I was having similar issues dealing with the crimes myself. By 2005 I had lost my family & bussiness, I was in counseling & very concerned for my own safty - Once me & the girls began to discuss what happen & lead up to these events in June of 2003, I befriended them, because it was clear that they - Lesley Reed, set up these crimes with Mr Blackwell.

I sincerly did not have any knowlege or pre planned notions that this group was planning to commit any crimes.

Surely the state is considering, the inconsistant testimony of these individuals as evidence against me, for most of their testimony was that they did not remember pertinent facts. "I don't remember", was a common statement used to either hide the truth or conceal evidence

As I've stated my conviction is based upon the prejudices & inconsistances I suffered during trial, this by no way should be viewed as evidence against me. I do understand it was a jury that found me guilty - but if you thoroughly

Review the Verbatim of These proceedings, you'll discover that this Verdict of guilt, was Accumulated by withholding facts & Confusing the jurors as to what the law is. Glad I stood trial, on my own without any Co-defendants the state would of never gained the conviction it sought out.

Ms. Schnadeen testified, "Antwonn, doesn't usually hang out with us. (Verbatim page 225, Line 10)

Claims she could see house from sitting in car, but yet the driver testified house was blocked by fence, & photo evidence proved fence concealed house (pg 248)

She testifys she didn't see any one carrying anything from Lesleys Car (Pg 250) Says Chris was going to sell or buy some drugs not rob anyone (pg 261) Says Antwonn put Tahoe in Garage, but Lesley testified I abandoned vehicle (2) blocks from Chris's house, I also testified I abandoned vehicle & ran home (pg 262) - Says she counted $23,000, in Garage, notice that $15,000 + $8,000, which no one claimed as missing until days before trial, (pg 265) this girl is tryin to remember what she's read from state! Lesley testified I was not at Chris's house after Abandoning truck. I received no money from this crime. (pg 272) She says it was Chris & George who came to Fred meyers to pick them up! (pg 273) Says it was Chris George Lesley & her @ Chris house later in the day of June 15, this is prior to going to lake Tapps, Antwonn was not there - (pg 275) (pg 276) Chris was going to have someone burn truck, He told her this.

It was George who told her not to testify, not me because I felt I had nothing to hide - (pg 278) (pg 310) Antwonn had nothing to do with the plan to destroy stolen vehicle.

These witness's testimonys are based solely on their assumptions, not Actual facts or evidence.

After Reading this witness's testimony its clear that she is lying about her involvement & recollection of the events that occurred this night, for she's testifying that she was to intoxicated to remember the facts, but yet she can remember specific details that are required to fulfill her agreement with the state.

I'm not asking the counts to access her credibility, I'm asking them to weigh her testimony in regards to her actual involvement & benefit for giving the state what they want to hear, while minimizing her own involvement & knowledge of these crimes.

Its clear that @ 1 point we all were friends & now Mrs Reed is trying to protect herself & her best friend Trisha.

Lesley like everyone else was facing some very serious charges & she was willing to say & do anything to get those charges dropped. In Mrs Reeds direct testimony, she contradicted her other statements she gave prior to trial, If you would review, The counts Verbatim Report from pages 822 - 899, it will be obvious that this witness is lying about several important factors of this case. please compare, her recollection to the recollection of Mrs Schrodrenc testimony as well as my own testimony, and you may conclude the state has not proven, I agreed or had any knowlege of these crimes being planned or taking place. Further more once I realized what was happening I got away from these people for I wanted nothing to do with these crimes.

These crimes & punishment is to severe for the state to base his burden of proof on contradictory / fabricated uncertain testimony - This witness is lying - she planned this

In Ms Reeds testimony, She stated, Chris of George was surprised to learn that Josie may died from his wounds, this was the day after the crime, which proves Nobody knew about a murder until later in the day - (Evidentiary Hearing Vol 7 Pg 893)

Mrs Reed never seen Antwoon Washington with a firearm on any proceeds from these crimes (Vol 7 Pg 89

Ms Reed also testified that her & Ms Schnoderer were together at all times during the course of these crimes, Ms Reed admitted she could not see the target Residence because of the distance & a fence that obstructed their view,

She states she never seen Antwoon or George with any guns & she assumed "we" went in the house, (Vol 7 Pg 917)

And In Ms Reeds & Mr Rhodes testimony they both testified that you cant see, the drive way on the house from where Mrs Reed parked her car. These facts are very important because it clearly shows that Ms. Schnoderer was relying about her Recollection that she seen All (3) suspects put mask on & enter or exit the Residence.

I Never went in this house, I never had a gun & I never wore any type of mask, or had any knowlege or intentions to commit any crimes - these are all Essential elements that need to be proven, beyond a Reasonable doubt, the state has failed to prove these elements

And No Curative instruction can Revoke an prejudice that occured or Relieve the state from proven its burden

- Prosecution has pretty much vouched to the credibility of these testifying co-defendants, who have said they would do anything not to go to prison for life - the evidence shows that I had no knowlege of any drugs, money or fancy cars that were recently purchased by Mr Bride, I didnt even know where he lived or the people/victims he associated with.

- The law states that I would have to have the same criminal intent that the other suspects had in Lesley Reeds testimony she said Chris & Her spoke about their scheme in the kitchen of Mr Blackwells home (outside the presence of the others) Trisha Schrodren whom is Lesley Reeds closes friend testified she had no prior knowlege of Chris's plans to commit any robbery - (lets remember - she's supposedly testifying to the "truth" so she can fulfill her obligations of her plea deal - if these crimes were a common scheme, surely she would have said these crimes were preplanned with everyones knowledge - if Ms Shrodren could of not known a crime/robbery was going to take place, surely I could of been unaware of these individuals plans as well, for Ms Schrodren was closer to these individuals than I was, I only knew these people thru my bussiness & my association was purely to network & meet more potential clients.

Judicial Abuse of discretion, Violation of due process
Ineffective Assistance of Counsel

During the initial sentencing phase of this trial, (May 11, 2007), I was afforded the opportunity to dismiss my current trial counsel, John Flemeny Browne, I motioned the court, to allow me an evidentiary hearing, to support my grounds for my CrR 7.5 (1)(2)(3)(4)(5)(6)(7)(8) motion for a new trial (May 16, 2008) The courts Appointed me new Counsel, Mr Robert Quillian. Mr Quillian was Appointed to represent me during sentencing & this motion. Mr Quillian found it necessary for him to get the client file from Mr Brownes firm, which delayed the reschedule sentencing hearing (June 20, 2008) Mr Quillian Requested this hearing be set over to (August 31, 2007) to allow him time to review the client file, & conduct necessary contacts to support grounds for granting a new Trial.

Unfortunately Mr Quillian was having some medical issues, that made him unavailable as prepared for the scheduled August 31, 2007 - hearing. So Rightfully the courts postponed this hearing til October 12, 2007. During this period of time, the courts granted Me, the opportunity to proceed with an evidentiary hearing on the CrR 7.5 motion, Mr Quillian notified the courts that he planned to meet with & call several witness's as well as Mr Browne & his investigator Jim Harris. Mr Quillian Also asked the courts to prepare portions of the trial verbatim, that would be very necessary @ this hearing, Mr Quillian was also seeking to obtain funding from the department of assigned Counsel, to pay for an investigator to meet with other witness's. All this work was being done, to prepare for the October 12, 2007, evidentiary hearing & sentencing. Needless to say between August 31, 2007 - & Oct 12, 2007 Mr Quillian was Recovering from his medical procedure, & was having difficulty obtaining the Courts Record & Approval for an investigator, For 1 week prior to this hearing (Oct 12, 2007) Mr Brownes firm notified Mr Quillian, that they would not be available for court til Mid-November 2007

As well the Department of assigned Counsel did not approve the funding of an investigation of the Courts Verbatim Reports until Dec. 2007

Mr Quillian explained in his motion for extension of the proceeding & my declaration that he needed this information he was seeking to obtain, in order to effectively Represent me during sentencing & the approved 7.5 evidentiary hearing, as well as familiarize himself with this case. October 12, 2007, Mr Quillian appeared in Court, informing the court of the status of the progress he was making, As well as asking for another continuances due to the delay of progress. He provided the Courts with assurance that these delays were not his doing. But this continance was necessary to proceed with the evidentiary hearing.

The Courts went along with the states position in proceeding to sentencing, without Ruling on this motion or allowing for the evendatary hearing. The Judge stated, it wasn't her Recollection that she granted an evidentary hearing. (vol 6, Pg 565 Line 23-25)

But the recorded clearly shows she did Authorize an evidentary hearing (verbatim vol 5 page 557 Line 7-11, June 22, 2007)

Mr Quillian Argued that, her proceeding to sentence @ this point would be prejudicial towards me, for he has not been able to counsel me on sentencing concerns & mitagating issues, therefore Rendering him ineffective in Representing me during sentencing.

Ultimately the Courts proceeded to sentencing & violating my Rights to due Process of the Laws as well as violating CAR 7.5(E) Disposition of motion which says, A CAR 7.5 motion shall be disposed of before judgement & sentence or Order a deffering of Sentence. By violation this statute this court denyed me the opportunity to create a Record of the grounds for vacation of this Conviction. Also by doing this the judge went against her own Ruling - which other Courts have held that its Reversible Error to Change or violate the courts own Ruling - this Judge ultimately abussed her discreation by not properly disposing of this motion prior to sentencing & it became very aware to her, based on the communications with counsel after sentencing (Verbatim vol 7 pg 597 Line 4-25 - pg 599 Line 1-10 Date 12/12/07)

Ultimately the Judges actions banned My lawyer from seeking appropriate Relief or creating a record for grounds of relief: Making this judges actions Prejudical towards me. To this day this motion has not been disposed of or Ruled upon.

Consequently Mr Quillian, had to withdrawl as my Counsel, so that the appeal counts could assign me appeallate Counsel.

In Frazer vs. U.S. 18 F. 3d 778 9th cir 1994 The Counts Ruled: Counts must hold evidentary hearings on motions to vacate convictions, when the petitioners allegations are based upon facts outside of the Record, failure to hold evidentary hearings, following the motion to vacate on whether a defendants 6th admendment Right to counsel @ Trial was violated, is an abuse of discretion on the Judges behalf.

Judge Roseanna Buckner Abused her discreation by banning my lawyer from Arguing grounds for Relief & adequately prepare for the sentencing Phase of this trial

Please Review the verbatim report on these matters

Vol 5 pages 549-560 June 22, 2007
Vol 6 pages 561-587 Oct 12, 2007
Vol 7 pages 587-600 Dec 14, 2007

Had the judge Allowed the evidentary hearing the Counts would of heard testmonys & evidence from witness's my trial lawyer failed to contact As well as my family Counselor & several eyewitness's to these crimes.

The law goes farther than Requiring a impartial Judge, it also Requires the Judge appear to be impartial. Next in importance to Render a Righteous Judgement it is that it be accomplished in such a manner that No Reasonable question as to impartiality or fairness Can be Raised. Its Clear by this Judges actions that she was not being totally fair or impartial to my defense.

IN THE COURT OF APPEALS
FOR THE STATE OF WASHINGTON
AT DIVISION 2

Antwonn D. Washington
Appellant,
vs.
State of Washington
Respondent.

COURT OF APPEALS
DIVISION II
09 FEB -3 PM 2:39
STATE OF WASHINGTON
BY
DEPUTY

PROOF OF SERVICE

I, Antwonn Washington, declare that, on
(Name of Inmate)

January 31, 2009, I deposited the foregoing
(Month) (Day) (Year)

Statement of Additional Grounds
(Name of Documents)

or a copy thereof, in the internal mail system of Clallam Bay Correction Center and made arrangements for postage to:

Washington State Court of Appeals
Division II
950 Broadway, Suite 300
Tacoma, WA 98402

I declare under penalty of perjury under the laws of the State of Washington, pursuant to RCW 9A.72.085, and the laws of the United States, pursuant to Title 28 U.S.C. § 1746, that the forgoing is true and correct.

Executed on this 31 day of January, 2009

Dated at Clallam Bay, Wa.

Antwonn Washington, Pro se

GR 3.1(a)(b)(c)

CERTIFICATE OF SERVICE
I certify that I mailed
copies of
to
&
Date

Clallam Bay Corrections Center
1830 Eagle Crest Way
Clallam Bay, WA 98326-9723

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FEB 03 2009
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