FILED
COURT OF APPEALS
DIVISION II

09 FEB 17 PM 2:11

STATE OF WASHINGTON
BY _____
DEPUTY

COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION 2

STATE OF WASHINGTON,	)	
	)	
Respondent,	)	
	)	No. [redacted] 37670-9-II
v.	)	
	)	STATEMENT OF ADDITIONAL
Timothy, HARRISON,	)	GROUNDS FOR REVIEW
	)	RAP 10 10
Appellant.	)	

I, Timothy, HARRISON, 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.

During Trial:

Additional Ground 1

My Att MR. Barrar never asked for medical reports or photos to suport the claim of crack teeth because of all the incosistences of the alleged victom. Nor did he object to the statements of cracked teeth on the grounds of no photos or medical reports to suport the claim. MR. Barrar never obtained an investigator, and showed lack of suport. ~~see~~ P. 141-142. On P.2 MR. Barrar waved the 3.5 against my wishes and not once did he cross examine officer Sorenson concerning the statements in which he obtained from the alleged victom. On p.183 alleged victom states that I punched her in the mouth. In Portland Police Reports by officer Sorenson she states that I was careful not to hit her with a close fist. (See copy P.4/7) If alleged Victoms teeth were cracked she would have complained of dental pain as well as eye pain the same day of the interview by officer Sorensen and fracture would have been checked in the box of his reports. (See PPR Page 1 of 2; 2 of 2) ~~Additional Ground 2~~ MR. Barrar failed to object to leading questions by the prosecutor and the fact that she mentioned alleged previous assaults. See P.92, 93 & 112. The playing of the Multnomah county jail phone calls that I was unaware of which I personaly objected to in a verbal and written motion on record. See 138-139. MR. Barrar never contested the fact that I was unaware. He never called any of my witness to take the stand who where prezent through-out my trial proceeds. MR. Barrar never cross examined the alleged victom concerning her criminal history which would have displayed

her charactor; to the jurys. The Multnomah county jail phone calls where not played through there entirety. There wasn't any evidence of some of the injurys that where stated in trial. (Additional Ground 2) Prosecutor Ms. Bandfield not being truthful prior to and through out proceed which prejudiced the jury and constitues prosecutorial misconduct which is insufficent grounds for conviction as charged. After alleged victom spoken to ms Bandfield then comes dental pain. On page 64-65 D Trueworthy stated that 4 days latter some new dental pain at that time. P.65 But there wasn't any visible damage. Please see officer Sorensen P.237-239 for injurys. On P.249 Clearly Prosecutor ms Bandfield not being truthful by composing nonauthentic statements for the alleged victom to state in which she probley finds humorous. She has to be of Jamacian origin with that hair and all. There was no statements made concerning escort untill alleged ~~Additional Ground 3~~ victom met the prosecutor ms Bandfield Then she was manipulated by her and goaded into making false statements. On P.319-320 there was no evidence physical, photos or medical reports showing cracked teeth again this statement is also manipulated by ms. Bandfield. In referance to P.319-320 judge Bennett seams to be making his own law or modifying it to fit. On P.329 closing arguements Prosecutor ms. Bandfield again made statements that are not appropriate by stating "If Some One had beet you as many times as he beet you, if Someone had kidnapped you and robbed you and broken your bones". In a partial of her statements here she refers to other alleged incidents that was stated during the course of the trial or alleged assaults, Other alleged assaults.

(Additional Ground #3)

The violation of my fast and [redacted] speedy trial rights. Judge Wulle changed my arrest date from 11-21-07 to 1-10-08 which candidly violates my rights against my will. P.446-447.

(Additonal Ground 4)

During the verdict the jury was rushed into making a decision, by judge Bennett.

Judge Bennett ask the bailiffs to move me to the back of the courtroom. [redacted] And he asked my parents to move to the other side of the [redacted] courtroom across from the jury that they where in the process of picking while we where waiting for the outcome of the verdict from my jury. It was a lady and her

husband getting a divorce. Somethings where discuss. the judge took a recess and befor he left, he told the bailiffs to take me to a available courtroom down the hall. Before departing he also asked the court clerk to inform the jurys to com. there to diliver my verdict. The forman came in to our new courtroom and said that the jury is deadlocked on 2 of the charges. They had ~~are~~ already been diliberating since the previou: day. So Judge Bennett responded that they should come to a conclusion because of his prior engagement in so many words. The foreman ~~[illegible]~~ then returned to the juries and moments later they all came out with verdicts.

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

Date: 2-11-09 Signature: Timothy [signature]

CERTIFICATE OF SERVICE
I certify that I mailed
1 copies of SAG
to M. Kinnie
& P. Tiller
2/19/09 KSO
Date Signed

PORTLAND POLICE BUREAU

CONTINUATION REPORT

PAGE 4/7

CASE NO. 07-037672

CLASSIFICATION

TYPE OF CONTINUATION: ☒ INCIDENT ☐ TRAFFIC ACCIDENT ☐ CUSTODY ☐ SPECIAL

SUBJECT'S NAME: CROTS, KRISTIN B.

CRN

SEX: F | RACE: W | DOB: [redacted]

LOCATION OF OCCURRENCE: [redacted]

NARRATIVE–The order of appearance for additional information will be:
ITEM 1: ADDITIONAL PERSON INFO–List additional people (not suspects) and identify their involvement with the appropriate code. Additional person info includes contacts.
ITEM 2: ADDITIONAL SUSPECT INFO–Report all suspect info on additional incident reports. Each suspect must have coded crime analysis descriptors. Detail in the narrative only suspect info not covered in the boxes.
ITEM 3: ADDITIONAL VEHICLE INFO–List additional vehicles in the same fashion as reported in the vehicle section. Include the identifying code.
ITEM 4: ADDITIONAL WORTHLESS DOCUMENTS–Record multiple worthless documents on a multiple worthless document form and attach as additional pages. Record in the narrative the number of worthless documents written.
ITEM 5: ADDITIONAL PROPERTY–Record no more than four additional items of property in the narrative–and/or use a special report and attach as additional pages.
ITEM 6: ADDITIONAL OFFICERS–List all officers present and identify their involvement with the incident being reported.
ITEM 7: SUMMARY–A short summary is necessary if the narrative is more than one full page in length.
ITEM 8: NARRATIVE–List in chronological order all of the relevant details in the incident and/or elements of the crime or violation.

CASE NO.

ITEM	CODE	
8		in combinations that caused her to go to the ground 5-6 times, taking punishment each time she got up. She said he wrestled with her on the ground and picked her a couple of times. (Crots said Harrison was cautious about hitting her with a closed fist.)
		Still unable to get her in the car Harrison got behind the wheel of the car and tried to run her over. Crots said she had to run and retreat behind a nearby small building structure. Then Harrison got out of the car and shouted at Crots, "I'm going to beat your ass in front of everybody unless you get in the car and come with me." Crots said Harrison approached her and "stabbed" her in the left eye with his long finger nail. She then got in the car because she was blinded and succumbed to the violence and threats.
		Crots said Harrison drove her to Irvington School where they slept in the car for a few hours. Crots said she woke up about 0600 hrs. and the pain in her face was so severe that she demanded Harrison take her to a hospital. He complied and she said she arrived at Providence Hosp. about 0630 hrs. Crots said he dropped her off at the public vehicle turnaround outside the ER entrance and drove away in his silver Cadillac. She said he retained her cell phone and purse.

REPORTING OFFICER(S)	BPST	PREC/DIV	RLF/SHFT	ASSN/DIST	SUPERVISOR'S SIGNATURE
B. SORENSEN	25061	SE/U	m	722/721	

PPB-CR-9/84

267 (9/96)

3 Bob

NON-CONNECT

THIS REPORT MUST BE ACCOMPANIED BY AN INCIDENT REPORT

PORTLAND POLICE BUREAU

FAMILY ABUSE - SUPPLEMENTAL REPORT

PAGE/OF 1/2

CASE NO.	REFER CASE NO.	CLASSIFICATION
07-037672		

COMPLAINANT'S NAME (CO)	CRN	SEX	RACE	DOB	INTERVIEWED?
CROTS, KRISTIN B.		F	W	[redacted]	☒ yes

LIST ALL CHILDREN UNDER CARE/CUSTODY/GUARDIANSHIP OF PERSONS INVOLVED WHETHER PRESENT AT SCENE OR NOT. SHOW ADDITIONAL CHILDREN ☐, AND DETAILS, ON INCIDENT REPORT. CHECK ALL BOXES THAT APPLY.

CHILD'S NAME (Present ☐ Witness ☒ Not Present ☐)	CRN	SEX	RACE	DOB	INTERVIEWED? / WELFARE CHEK'D? / PROT. CUSTODY?
DAINING, DERIC -		M	W/B	[redacted]	☐ ☐ ☐
CHILD'S NAME (Present ☐ Witness ☐ Not Present ☐)	CRN	SEX	RACE	DOB	☐ ☐ ☐
CHILD'S NAME (Present ☐ Witness ☐ Not Present ☐)	CRN	SEX	RACE	DOB	☐ ☐ ☐

CASE NO.

COPIES

☐ East
☐ North
☐ NE
☐ SE
☐ Central
☐ DET
☐ ID
☐ DVRU
☐ SOSCF
☐
☐
☐
☐
☐
☐
☐

COMPUTER ENTRY

☐ Person
OPR
☐ Vehicle
OPR
☐ Prop/Crime
45985
OPR
☐ Book
OPR

(1) CO/A1 RELATIONSHIP (Check all that apply)

☐A - Spouse ☐B - Former Spouse ☒C - Cohabitants ☐D - Former Cohabitants
☒E - Intimate ☐F - Former Intimate ☐G - Blood Related ☐H - Not Blood Related
☐I - Caregiver ☐J - Guardian ☐K - Same Sex ☐L - Parent of Child from Relationship

(2) RELATIONSHIP HISTORY

Prior Child/Family Abuse history? ☒A Incidents Documented? ☐B Stalking? ☐C Retaliating Threats? ☐D
Investigating Agency(ies): E

(3) RESTRAINING ORDERS OBTAINED

Victim (CO): RO Number A Suspect (A): RO Number B

(4) EVIDENCE

ID Called: ☒A
Collected from: ☐B - Crime Scene ☒C - Hospital ☐D - Other (explain) E
Photos: ☒F - 35mm ☐G - Polaroid Number Taken: H Taken By: I Shawnda Wynter
Type of weapon(s) used: J
weapon(s) seized: ☐K Firearms seized: ☐L
Property receipt number(s): M 1041885

additional digital photos by investigating officer B. Sorensen

(5) MEDICAL TREATMENT

CO	A1		CO	A1	
☐CA	☐AA	- Refused Medical Aid	☐CB	☐AB	- Will see own Doctor
☐CC	☐AC	- First Aid	☐CD	☒AD	- No Medical Treatment Required
☒CE	☐AE	- Hospital F PROVIDENCE	Attending Physician(s) G		
☐CH	☐AH	- Paramedics at Scene ☐I	Ambulance Unit J		Fire Unit K

(6) VICTIM CONTACT

PURSUANT TO ORS 133.055 I FEAR FOR MY WELL BEING AND/OR THE WELL BEING OF THOSE CLOSE TO ME. THEREFORE, FOR SECURITY, I HAVE BEEN MOVED TO A
PHONE B

I REQUEST THIS CONTACT INFORMATION TO BE TREATED AS CONFIDENTIAL ☐C - YES ☐D - NO

I AUTHORIZE THE RELEASE OF MEDICAL TREATMENT INFORMATION FROM THIS INCIDENT, TO THE MULTNOMAH COUNTY DISTRICT ATTORNEY'S OFFICE FOR INVESTIGATIVE AND COURT PURPOSES. I ACKNOWLEDGE THAT INFORMATION TO BE RELEASED MAY INCLUDE MENTAL HEALTH, ALCOHOL AND/OR DRUG ABUSE INFORMATION THAT IS PROTECTED BY FEDERAL LAW AND CANNOT BE RELEASED WITHOUT MY CONSENT ☐E - YES ☐F - NO

Complainant Signature G Time H Date

Attesting to signature is the Reporting Officer compiling this report.

REPORTING OFFICER(S)	BPST	PREC/DIV	RLF/SHFT	ASSN/DIST	SUPERVISOR'S SIGNATURE
B. Sorensen	25061	SE/W	M	724/721	Sgt. J. Pearce #29904

595 (12/98)

PORTLAND POLICE BUREAU

FAMILY ABUSE - SUPPLEMENTAL REPORT

CASE NO. 07-037672

REFER CASE NO.

CLASSIFICATION

THIS REPORT *MUST* BE ACCOMPANIED BY AN INCIDENT REPORT

(7) EMOTIONAL CONDITION

CO	A1		CO	A1		CO	A1	
☐ CA	☐ AA	- Afraid	☐ CB	☐ AB	- Alcohol	☒ CC	☐ AC	- Angry
☐ CD	☐ AD	- Apologetic	☐ CE	☐ AE	- Calm	☒ CF	☐ AF	- Crying
☐ CG	☐ AG	- Drugs	☒ CH	☐ AH	- Fearful	☐ CI	☐ AI	- Hysterical
☐ CJ	☐ AJ	- Irrational	☐ CK	☐ AK	- Nervous	☐ CL	☐ AL	- Other
☐ CM	☐ AM	- Threatening	☐ CN	☐ AN	- Denial			

(8) CO - PHYSICAL CONTACT TYPE

CO - ☐ CA Attempted to Suffocate ☒ CB Banged Head ☐ CC Bit ☐ CD Burned ☒ CE Choked
☐ CF Hit with Closed Fist ☐ CG Hit with Elbow ☒ CH Kicked ☐ CI Kneed ☒ CJ Pulled Hair
☒ CK Pushed/Shoved ☒ CL Scratched ☐ CM Sexual Contact ☒ CN Slapped with Hand
☐ CO Threw Object ☐ CP (Other - specify) _____

(9) PHYSICAL APPEARANCE & (CO) DIAGRAM

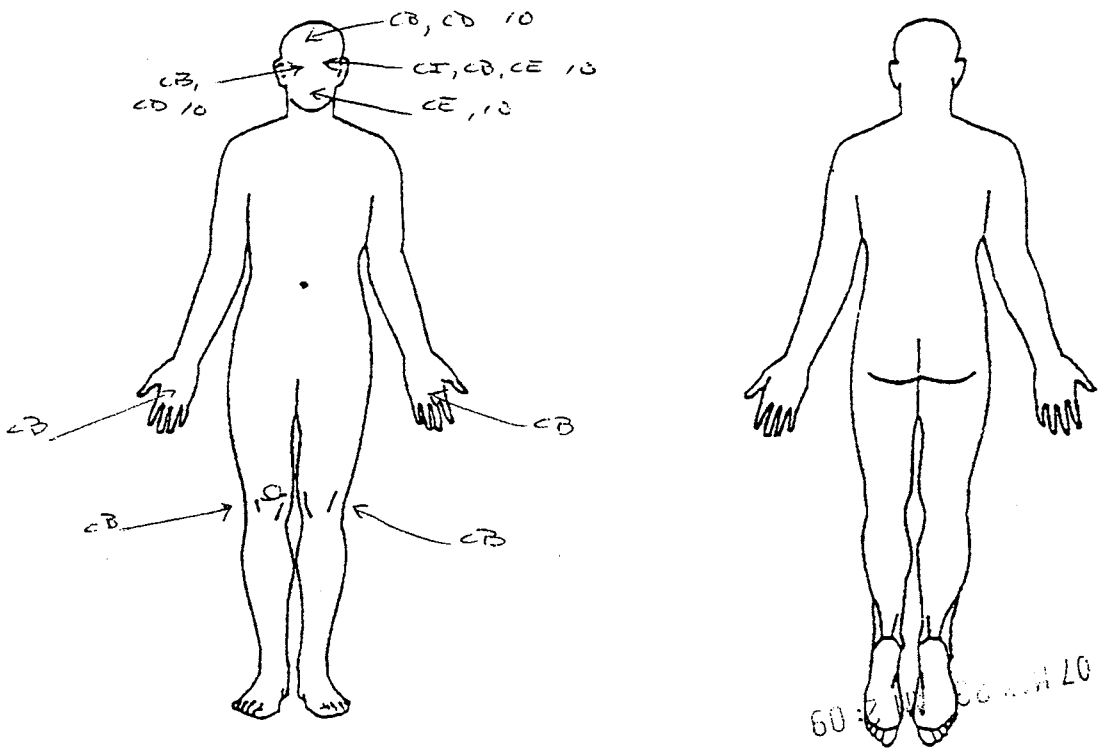
(check all boxes that apply AND enter descriptor number(s) to body diagram(s)

CO	A1		CO	A1		CO	A1	
☐ CA	☐ AA	- (1) Abrasion(s)	☒ CB	☐ AB	- (2) Bruise(s)	☐ CC	☐ AC	- (3) Choking
☒ CD	☐ AD	- (4) Comp of Pain	☒ CE	☐ AE	- (5) Cut(s)	☐ CF	☐ AF	- (6) Concussion(s)
☐ CG	☐ AG	- (7) Fracture(s)	☐ CH	☐ AH	- (8) Lacerations	☒ CI	☐ AI	- (9) Red Mark(s)
☐ CJ	☐ AJ	- (10) Other - specify _____				☐ CK		(CO) is pregnant

(If A1 claims to be a victim, *AND A1 boxes are checked,* another Family Abuse - Supplemental Report should be completed

How does victim rate discomfort/pain of injuries?

(Mild) 1 2 3 4 5 6 7 8 9 (10) (Severe)



CONTACTS/REFERRALS: SOSCF - ☐ ADS - ☐ OTHER AGENCIES (list) - _____

TIMOTHY, HARRISON
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1830 Eagle CREST Way
Clallam Bay, WA 98326

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