

COURT OF APPEALS  
DIVISION TWO  
OF THE STATE OF WASHINGTON

**ORIGINAL**

FILED  
COURT OF APPEALS  
DIVISION II

STATE OF WASHINGTON )  
 )  
 Respondent, )  
 )  
 v. )  
 Joseph Moore )  
 (your name) )  
 )  
 Appellant. )

11 JAN 10 AM 9:19

No. 40376-S-II BY [Signature]  
STATE OF WASHINGTON  
DEPUTY

STATEMENT OF ADDITIONAL  
GROUNDS FOR REVIEW

I, Joseph Moore, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

Attached

Additional Ground 2

Attached

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

Date: 01-10-2011

Signature: [Signature]

**CERTIFICATE OF SERVICE**  
I certify that I mailed  
1 copies of SAG  
to App. Counsel/Dieter  
& Proc. office/Court/la  
1/11/11  
Date Signed

## Ground 1

the Court erred when it allowed Hershey to the witness tampering charge Mr Debray objected VRP AT 101-102 the Judge said if Mr Hook validated it was him on the phone he would allow it - the call was never played in court for Hook to say it was him - rendering it Hershey - A Crawford ISSUE. it could have been anyone on the calls.

## Ground 2

DUE Process was violated when it allowed evidence of the jail phone calls to be chopped up not played in their entirety VRP AT 64-67. Mr Debray tried to play them VRP AT 65 the Judge said it was inefficient use of the Courts time. VRD 303 313 Mr Smith said he edited them VRP AT 86

### Ground 3

The Court erred By not Bifurcating Count 4 Mr Debray motioned it VRP AT 31 I was severely Prejudiced when the jury herd I had a PAST Burglary 70 it was 15+ years old A juvenile charge. it was the same charge I was on Trial for.

### Ground 4

Counsel was ineffective for not Suppressing the Jail Phone calls as Hersay even after the judge said that Mr. Hook had to confirm that it was him on that call or it was not admissible VRP AT 101-102 the call was not played in Court when Mr. Hook was there to validate it

### Ground 5

Ineffective Counsel for during closing Argument Mr. Debray said I was guilty of witness Tampering VRP AT 445-446

## Ground 6

Court admitted a Photo of A fire arm  
it was objected By Attorney  
VRD AT 320. it was more Prejudicial  
it was not the firearm in this  
Case. it's more Prejudicial than  
Probative.

## GROUND 7

Commulative Errors. I Believe all  
added up I did not Get A FAIR  
TRIAL and Believe the Court should  
GRANT A NEW TRIAL

Dated this 10<sup>th</sup> day of January , 2010

Joseph Moore  
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