

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

STATE OF WASHINGTON
Respondent,

v.

Jeffrey Brandon Knudtson
Appellant.

No. 41583-6-II

STATEMENT OF ADDITIONAL
GROUND FOR REVIEW

11 JUN 24 PM 10:24

CERTIFICATE OF SERVICE

I certify that I mailed
1 copies of 5a
to app counsel of Cavanaugh
& Pres. of Pierce County
6/21/11
Date Signed

I, Jeffrey Brandon Knudtson, have recieved and reviewed the opening breif prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the court will view this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

Mr. McNeish failed to provide effective council in several ways.

1: There is no evidence of a 3.5 hearing (evientary hearing) which is mandatory under CrR 3.5

2: On several court appearances I was kept in the jury room and not in front of judge Chushcoff. I have a witness to this behavior.

3: Refused to subpeona alleged victims medical records. I have knowledge of contents.

4: Two weeks prior to trial, after taking three personal vacations, was not prepared and moving forward. I requested new council at this point.

5: Refused to challenge the confession I allegedly made in new york after I had informed him that it had been altered and was not in my hand writting.

Additional Ground 2

Mr. Chin failed to provide effective council in several ways.

1: Mr. Chin took over where Mr. McNeish left off. He used the notes and information from previous council which prejudiced his performance unfavorably. STATE V. AHO.

2: Refused the same items as previous council had before.

3: Again two weeks prior to trial, not prepared and moving forward.

4: Bargained a plea which he failed to inform me would give me two strikes. At sentencing judge Chushcoff failed to inform me of this as well.

5: All parties involved in my case overlooked the fact that my alleged crime was dated for 1999.

6: Prosecutor had threatened to re-arraign me and add new charges. Did not inform me that I couldn't be charged with what was threatened. Therefore under threat of additional charges took the plea.

6/21/11

J.B. Kist