

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

COURT OF APPEALS
DIVISION II

STATE OF WASHINGTON)

11 SEP 21 AM 11:09

Respondent,)

No. 48535-89-11 CU
STATE OF WASHINGTON
DEPUTY

v.)

Scott, Richard
(your name)

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

Appellant.)

I, R. Scott, 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

see attached

AND Exhibit 1

Additional Ground 2

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

Date: 9-18-11

Signature: [Signature]

• Where are no factual disputes to be resolved.
The prosecutor has argued that "no crime occurred".
Only procedural arguments.

Remand for an evidentiary hearing for what??

Facts not in dispute:

- 1) Alleged victim was in another state until of age.
- 2) Any admitted sexual contact occurred after alleged victim was of age.

The prosecutors' argument is that actual innocence is not relative.

R. Scott