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By

STATEMENT OF ADDITIONAL GROUNDS INDEX

Superior Court case NO. 05-1-50195-1
COA NO. 25218-3-III

State of Washington v. Ricardo Iniguez

1. Establishing Juror prejudice

2. Spanish Interpreter Coaching states witness on the stand.

3. Sixth Amendment Ineffective assistance of Counsil Violation

ATTACHMENT "1" PG 165 Court Transcripts

Ricardo Iniguez 89574
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DATE

STATEMENT OF ADDITIONAL GROUNDS

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Superior CASE NO. 05-1-50195-1
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STATE OF WASHINGTON V. RICARDO INIGUEZ

1. During my trial while crucial information was being Testified to by detectiv Baker one of the Jurors was Asleep! By a Juror to find me guilty when He/she does not know all the fact's of my case due to sleeping, during Testamony prejudiced my Defense and my right to a fair and speedy trial. Based on this fact I ask the court to establish Juror prejudice as a resul of extraneouse Influences and reverse conviction and remand back to county for Retria See: Attachment 1 pg 165 of trial Transcripts Juror Asleep.

2. During trial The Enterpeter Coached States witness while Mariano Escobar was on the witness stand He was asked what kind of Gun

1 Was displayed at the time of the
2 crime". The Interperter then continued
3 to describe the Gun and asked the
4 witness was it like that, the court
5 should make "Note" that the witness would
6 not have been able to Identify the Gun
7 in question if the Interperter would
8 not have discribed the weapon and
9 coached him in to say what the state
10 wanted
11
12
13
14
15 3. My public Defender refused to "1"
16 Call witness's that would have supported
17 My defense "2" let me Review Discovery
18 material "3" ask Witness's questions that
19 would have supported my Innocense 4
20 Refused to move for a trial by Judge
21 which I told Him to DO. As I Have A
22 right to which is protected by the
23 Constitution of the United states of
24 America. Due to the fact Ineffective
25 assistance of counsil applys to my case.
26 My sixth Amendment has been violated.
27 under the sixth Amendement Confrotation clause.
28 (of cross Axamening states witness's.
statement of Add Grounds) (pg 3 of 3

1 under the sixth Amendment I have
2 a right to conflict-free Representation
3 See: Glasser V. U.S 315 U.S. 60, 62 S.
4 CT 457, 86 L. Ed. 680 (1942)
5 ALSO: Holloway V. ARKANSAS 435 U.S.
6 475, 98 S. ct, 1173, 55 L. Ed. 2d 426
7 (1978) ALSO: Vines V. U.S. 28 F.3d
8 1123 (11th Cir, 1994) ALSO: Older V. U.S.
9 224 F.3d 561, 2000 FED App 274 P
10 (6th Cir 2000) ALSO: U.S. V. Cronic,
11 675 F.2d 1126 (10th Cir. 1982) Cert granted
12 459 U.S 1119, 103 S.CT., 75 LED.2d
13 430 (1983) "1" FAILURE TO adequately
14 Research or Interview Witnesses: See:
15 Thomas V. lockhart 738 F.2d 304 (8th cir.
16 1984) SEE: STATE V. BUTler, 951 S.W.2d 60
17 (mo. 1999) "2". FAILURE TO INVESTIGATE MITIGATI
18 EVIDENCE IN GENERAL See: King V.
19 STrickland, 748 F.2d 1462 (11th Cir 1984)
20 SEE: HORTON V. ZANT, 941 F.2d 1449 (11th
21 cir 1991) SEE: Hendricks V. CALDERON,
22 70 F.3d 1032, 1043-44 (9th cir 1995)
23 SEE: CARTER V. Bell, 218 F.3d 581,
24 2000 FED App. 221P (6th Cir 2000)
25 "3" Automatic Reversal See: Glasser V.
26 U.S., 315 U.S. 60, 75-76, 62 S. ct, 457
27 86 L Ed 680 (1942) SEE: LAWRENCE V.
28 (statement of Add Grounds) (pg 4 of 4)

Firmontrout, 900 F 2d 127, 130 (8th Cir. 1990 "4" ERRORS REGARDING AN ARGUMENT OF DEFENSE: MY Atterney Failed to move for trial by Judge AS Requested by ME: SEE: Pavel V. Hollins, 261 F.3d 210 (2d cir. 2001).

Ricardo Iniguez # 895746
4-A-10
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99362

* Declaration of mailing *

DATE: 1/23/07

Superior court case No: 05-1-50195-1
COA-NO. 25218-3-III
Case Name: State of washington V. Ricardo Iniguez

I Declare under penalty of perjury that on 1/23/07 I mailed a copy to the Following:

Court of appeals Division three
Patricia I. Crandall, Clerk/administrator
Post office Box 2159
Spokane, wa, 99210-2159 (PG 1 of 1)

Sincerely
Ricardo Iniguez 1/23/07