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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

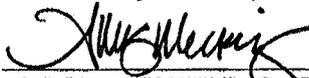
STATE OF WASHINGTON,                    )  
  )  
  Respondent,    ) No. 90246-1  
  )  
  vs.                    )  
  )  
KENNETH WAYNE                        ) STATEMENT OF  
SANDHOLM,                                ) ADDITIONAL AUTHORITY  
  )  
  Appellant.        )  
  )  
\_\_\_\_\_  
  )

Pursuant to RAP 10.8, The State respectfully cites the following as  
additional authority:

State v. Bonds, 98 Wn.2d 1, 17-18, 653 P.2d 1024 (constitutionally  
deficient instruction that allowed jury to rely on unsupported alternative  
means harmless when appellate court could “conclude confidently that the  
erroneous instruction in no way affected the outcome of the case.”)

Dated this 17<sup>th</sup> day of November, 2014.

DANIEL T. SATTERBERG  
Prosecuting Attorney

  
\_\_\_\_\_  
AMY R. MECKLING, WSBA #28274  
Senior Deputy Prosecuting Attorney  
Attorneys for Respondent  
Office WSBA #91002

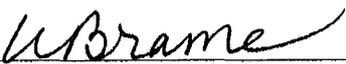
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Certificate of Service by Electronic Mail

Today I directed electronic mail addressed to the attorney for the appellant, Gregory Link, at [greg@washapp.org](mailto:greg@washapp.org), containing a copy of the STATEMENT OF ADDITIONAL AUTHORITY, in STATE V. KENNETH WAYNE SANDHOLM, Cause No. 90246-1, in the Supreme Court, for the State of Washington.

I certify under penalty of perjury of the laws of the State of Washington that the foregoing is true and correct.

Dated this 17<sup>th</sup> day of November, 2014

  
\_\_\_\_\_  
Name  
Done in Seattle, Washington

## OFFICE RECEPTIONIST, CLERK

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**To:** Brame, Wynne  
**Cc:** Meckling, Amy; 'greg@washapp.org' (greg@washapp.org)  
**Subject:** RE: State v. Kenneth Wayne Sandholm, Supreme Court No. 90246-1

Received 11-17-2014

Supreme Court Clerk's Office

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**From:** Brame, Wynne [mailto:Wynne.Brame@kingcounty.gov]  
**Sent:** Monday, November 17, 2014 11:36 AM  
**To:** OFFICE RECEPTIONIST, CLERK  
**Cc:** Meckling, Amy; 'greg@washapp.org' (greg@washapp.org)  
**Subject:** State v. Kenneth Wayne Sandholm, Supreme Court No. 90246-1

Please accept for filing the attached documents (Statement of Additional Authority) in State of Washington v. Kenneth Wayne Sandholm, No. 90246-1.

Thank you.

Amy Meckling  
Senior Deputy Prosecuting Attorney  
WSBA #28274  
King County Prosecutor's Office  
W554 King County Courthouse  
Seattle, WA 98104  
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WSBA # 91002

This e-mail has been sent by Wynne Brame, paralegal (phone: 206-296-9650), at Amy Meckling's direction.

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