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COURT OF APPEALS DIVISION ONE  
STATE OF WASHINGTON

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STATE OF WASHINGTON  
COURT OF APPEALS DIVISION ONE

STATE OF WASHINGTON

Respondent,

v.

JOSEPH KELLY,

Appellant.

No. 69369-7-1

STATEMENT OF ADDITIONAL GROUNDS  
FOR REVIEW

I, Joseph Kelly, 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

I believe Errol Hanson (the victim in this case) lied about many of the allegations against me due to our past financial entanglements. Every time I attempted to delve into the reasons why this might have occurred, an objection was sustained against me. I had no opportunity to present motive testimony for why Mr. Hanson would lie.

For instance, when I attempted to tell the court about the victim improperly seizing my daughter's car in retaliation for an unpaid loan, a relevance objection was sustained. (see p. 133:12).

Date: August 5, 2013

Signature: \_\_\_\_\_

