

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

STATE OF WASHINGTON)

Respondent,)

v.)

Shawn Lloyd)

(your name))

Appellant.)

No. 69526-6

STATEMENT OF ADDITIONAL
GROUNDS FOR REVIEW

I, Shawn Lloyd, 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

1, The issue of representation has and continues to be a high concern.
In addition to the declaration prepared by Mr. Link there also existed a list of
reason why I had reluctantly decided to appear pro se initially. Those reasons
all stem from ongoing communication and approach issues with my court appointed
a Honory Mr. Paul Vernon. I had at first requested a different attorney be assigned my
case, and well before trial had begun. After being denied alternative counsel several
times I reluctantly opted to represent myself after it was clear Mr. Vernon and myself
couldn't at bare minimum communicate with each other professionally. After several
requesting new counsel and being denied for undisclosed reasons, while valid reasons for my request
were disclosed. I opted to appear pro se in efforts to sever the tie between Mr.

Additional Ground 2

Vernon and I. After I was granted to appear pro se based on reasons that
were valid, and addressed in open court, the ~~same~~ judge decided to assign Mr. Vernon,
my whole reason for choosing to appear pro se was to end that conflicting relationship
and you, as my stand-in counsel ~~making~~ forcing that relationship to continue.
While I absolutely believed that I would not receive adequate representation from Mr. Vernon
If there are additional grounds, a brief summary is attached to this statement.

Date: 4-28-14

Signature: [Signature]

CON

... because he is a legal professional which I understand is why I ...
... an attorney I've had ongoing issues with, tried to fire several times, and was ~~permanently~~ ~~misrepresented~~
... reinstated as my primary counsel which I was repeatedly and unlawfully denied.

Further more, with adequate representation be Mr. Links sole approach in my
... appeal declaration I find it a bit on the conflict of interest side because he also
... works for the Defenders Association along with Paul Vernon which ~~is~~ the
... issues and concerns and basis of my appeal is directly connected with Mr. Vernon and
... The Defender's Association. What are the odds of that out of the 50+ Attorneys that
... work for the ~~Washington~~ Washington Appellate Project. These additional grounds to be
... accompanied with the Brief of Appellant prepared by Mr. Link thank you. Judge Schmitt
... also ordered the case back to ~~case~~ 1201 to Reinstated Assigned counsel,
... to Defendant. In order to continue - pg 102 lines 1-25

Additional Ground ~~is~~ ~~is~~ the way the jury functioned as well. I still have never
... heard, experienced, or witnessed anything being decided or determined in a Court of law by ~~the~~ defend
... witness, or attorney, which I was all 3 at some point throughout the trial, picking a folded piece of
... paper allegedly accompanied by 12 other pieces of paper ~~numbered~~ all numbered 1-13, out of a tupper
... bowl to decide which juror would be rotated out of the 12 main. Further more I believe
... that the additional juror is there only in the event that an unforeseen emergency
... kept 1 of the 12 active jurors out of or unable to ~~appear~~ be present for court and not an
... automatic process that occurs at every standard trial. If juror rotation is a standard proce
... or procedure for all trials surely there would be a much more reasonable, appropriate, and
... legal method for determining which juror would automatically be rotated out the day
... prior to deliberation, for no reason what so ever. It also just happened to be the one
... juror who was African American like myself, that was rotated out. And at the bare
... minimum the defendant should be forwarded the opportunity to view all pieces of paper
... allegedly numbered 1-13 to represent each juror, to confirm that each piece ~~listed~~ ~~at~~
... least out only 1 number on ~~it~~ a that none of the numbers were duplicat
... ed by mistake. It is for these additional grounds, accompanied with Mr. Links Brief of Appella

3. The court can't ~~deny~~ deny a motion to reinstate Assigned counsel
... based on 4 other appearances in court in which ~~the~~ the defendant's ~~was~~
... psychological and emotional state wasn't said enough

to make that decision p. 107
lines 10-25
p. 108 lines 1-25

4. State never produced evidence ~~that~~
... that there was an actual ~~mark~~ mark
... thus defendant, no evidence was
... provided that would suggest th
... there was no locked ~~entry~~ entry
... that was forcefully ajar or

102
lines 1-25