

FILED
Mar 25, 2014
Court of Appeals
Division I
State of Washington

No. 70236-0-1

COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION 1

Robert Merino,

Appellant,

v.

STATE OF WASHINGTON,
Appellee.

STATEMENT OF ADDITIONAL GROUNDS, RAP 10.10

name: Robert A. Merino
DOC# 364904, Unit H2-B-131U
Stafford Creek Corrections Center
191 Constantine Way
Aberdeen, WA 98520-9504

IN THE COURT OF APPEALS OF THE STATE OF WASHINGTON
FOR DIVISION 1

Robert A. Merino,
Petitioner,

vs.

State of WA.,
Respondent

Case No.: 70236-0-1

STATEMENT OF ADDITIONAL
GROUNDS, PURSUANT TO
RAP 10.10

I, Robert A. Merino, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in the 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

Trial Judge erred by denying me stand-by
counsel prior to trial, yet trial judge allowed
me to be represented by counsel at sentencing
violated The Appearance of Fairness Doctrine.
State v. Moreno 58.3d 265.147 WA 7d 500

58 P3d 271 Johnson J. (Dissenting) CJL
Canon 2 cmt. Judge Bowman abused his discretion,
when he allowed me to be represented AT
one critical stage of the process, yet
depriving me counsel AT another stage.

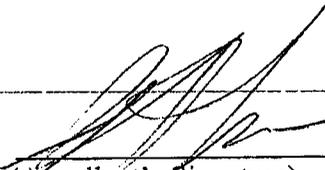
Additional Ground 2

I WAS DENIED ACCESS TO THE COURTS: WHEN THE
LAPTOP ASSIGNED TO VIEW DISCOVERY WENT FAULTY
THE BATTERY DIED AFTER 1 HOUR OF USE. THE COURT
WAS MADE AWARE OF ISSUE, BUT MADE NO INQUIRY
TO SOLVE ISSUE. I HAD LIMITED ACCESS TO LAW LIBRARY,
I WAS DENIED STAND-BY COUNSEL, I HAD NO CONTACT
WITH MY INVESTIGATOR, ALTHOUGH THE PROSECUTOR
WAS EMAILING MY INVESTIGATOR BACK N FORTH.
I RECEIVED BAD CONTACT INFORMATION FROM O.P.D.
FOR MY INVESTIGATOR. I WAS LIMITED SEVERELY IN
BUILDING A MEANINGFUL AND EFFECTIVE DEFENSE.

Additional Ground 3

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

DATED this 18 day of March, 2014.



(Appellant's Signature)

Robert Merino
(Appellant's Printed Name)

Stafford Creek Correction Center
191 Constantine Way, Unit# 142B131U
Aberdeen, Washington 98520