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6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
7 **IN AND FOR THE COUNTY OF MOHAVE**

8 STATE OF ARIZONA,

9 Plaintiff,

10 vs.

11 **WARREN STEED JEFFS**

12 Defendant.

No. CR-2007-743

RESPONSE TO MOTION  
FOR DEPOSITION OF  
WITNESS LAMONT BARLOW

13 COMES NOW, the State of Arizona, by the Mohave County Attorney, and hereby  
14 responds to Defendant's Motion for Deposition of Lamont Barlow.

15 The defense has requested a second Rule 15 interview with Lamont Barlow.  
16 Lamont Barlow has previously been interviewed in this case by the defense team and  
17 voluntarily appeared for that interview and answered all questions put to him. The  
18 defense is requesting a second interview due to statements made by a lady named  
19 Shannon Price who is the Director of Diversity Foundation. Shannon apparently  
20 mentioned in a conversation with Brock Belnap, the Washington County Attorney, that  
21 Shannon had a conversation with Lamont Barlow near the time of the trial that involved  
22 some issues concerning the case of the State of Utah vs. Warren Jeffs. Lamont Barlow  
23 is the husband of [REDACTED], who was the victim in the Utah case and is the victim in  
24 this case under this cause number.



1 According to Prosecutor Brock Belnap, Shannon Price mentioned to him in  
2 casual conversation that Lamont Barlow said something about [REDACTED] and trial  
3 testimony. Shannon indicated she did not remember many of the details of this  
4 conversation but said to Brock Belnap it had to do with [REDACTED] medical records and her  
5 testimony at trial. Importantly, Shannon did not know where Lamont heard or got this  
6 alleged information, and there was no indication that Lamont got this information from  
7 [REDACTED]

8 Despite what appears to be at least four layers of hearsay, Lamont Barlow,  
9 through his attorney, Roger Hoole, has indicated his position with respect to this  
10 requested deposition. The State would concur with the Memorandum filed by Roger  
11 Hoole, who is continuing to appear pro hac vice in this case and represents Lamont  
12 Barlow. In that Memorandum they have set forth certain conditions to the granting of a  
13 personal interview in this case.

14 Additionally, the State would point out that according to a police report generated  
15 by Deputy Jake Schultz from Washington County, there was some mention about  
16 [REDACTED] testimony and the veracity of that testimony with respect to medical records. In  
17 the trial of St. of Utah vs. Warren Jeffs in which [REDACTED] was the victim, [REDACTED]  
18 did not testify about medical records, doctor or nurses visits, or anything to do with  
19 medical records. In fact, the only testimony [REDACTED] gave in the Utah trial was on  
20 September 14, 2007, page 112, lines 20-25, and page 113, lines 1-2. Here is that  
21 exchange:

22 Q: Did you have children with Allen Steed?

23 A: No, I did not.

24 Q: Did you become pregnant?  
25

1 A: Yes.

2 Q: And what happened?

3 A: I had a few of them.

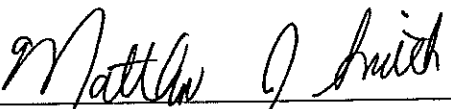
4 Q: A few of what?

5 A: Pregnancies. Um, I miscarried every one of them.

6 The alleged issue that forms the basis of the Defendant's Motion for Deposition  
7 appears to be a non-issue in this case because [REDACTED] did not testify about medical  
8 records. However, the State is willing to allow the defense to interview Lamont Barlow  
9 under the terms and conditions set forth in the Memorandum in Opposition to Motion for  
10 Deposition.

11 Lamont Barlow has never refused or failed to cooperate in granting an interview  
12 on this issue. The State suggested to defense counsel that in order to preserve this  
13 issue and to have this issue resolved before our next trip to Salt Lake City on March 16,  
14 that the defense proceed with a motion for deposition in case Lamont Barlow did not  
15 agree to a personal interview. The first time the State has had a chance to talk to  
16 Lamont Barlow, Mr. Barlow indicated that he had no problem being interviewed on this  
17 subject by Mr. Piccarreta.

18 RESPECTFULLY SUBMITTED THIS 26<sup>th</sup> day February, 2010.

19  
20   
21 MATTHEW J. SMITH  
MOHAVE COUNTY ATTORNEY

22  
23 Copy of the foregoing delivered this 26<sup>th</sup> day of  
February, 2010, to:

24 HONORABLE STEVEN F. CONN  
25 SUPERIOR COURT JUDGE

1 Copy of the foregoing emailed  
this 26<sup>th</sup> day of February, 2010, to:

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By *Ben Brooks*