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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,

No. CR-2007-743

10 vs.

RESPONSE TO MOTION
FOR DISCLOSURE REGARDING
BENEFITS PROVIDED TO STATE'S
WITNESSES

11 **WARREN STEED JEFFS**
12 Defendant.

13 COMES NOW, the State of Arizona, by the Mohave County Attorney, and hereby
14 responds to Defendant's Motion for Disclosure Regarding Benefits Provided to State's
15 Witnesses.

16 The State has contacted the law firm of Hoole & King concerning the defense's
17 request, and Roger Hoole of Hoole & King has responded that he is attempting to
18 gather this information at this time, and that he will forward it to the State as soon as he
19 is able to finish this task. The information that Mr. Hoole is gathering at this time is the
20 financial benefits or expenses that have been paid by the law firm of Hoole & King to
21 any of the State's witnesses in this case. In regard to the defense's second request, the
22 disclosure of all communications to and from any of these individuals and the law firm of
23 Hoole & King is extremely overbroad and could easily deal with matters that are the
24 subject of the attorney-client privilege. For example, two of the State's witnesses in this
25 case, Victims [REDACTED] and [REDACTED], are represented by the Law Firm of Hoole



1 & King, and communications between them and their lawyer would be protected by the
2 attorney-client privilege. The State believes that the defense is correct in its request for
3 financial benefits, but to ask for all communications is overbroad and is beyond the
4 scope of Rule 15 of the Arizona Rules of Criminal Procedure. There may be some
5 items in this particular defense request that are discoverable, but the issue needs to be
6 much more narrowly defined by the defense before the State could even begin to
7 comply with this request.

8 RESPECTFULLY SUBMITTED THIS 24th day May, 2010.

9 
10 _____
11 MATTHEW J. SMITH
12 MOHAVE COUNTY ATTORNEY

13 Copy of the foregoing delivered this 24th day of
14 May, 2010, to:

15 HONORABLE STEVEN F. CONN
16 SUPERIOR COURT JUDGE

17 Copy of the foregoing emailed
18 this 24th day of May, 2010, to:

19 Michael L. Piccarreta
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22 Tucson, Arizona 85701
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