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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  
DISCLOSURE OF IMPEACHMENT  
MATERIAL CONCERNING  
COMPLAINING WITNESS

13 COMES NOW, the State of Arizona, by the Mohave County Attorney, and hereby  
14 moves this Court to deny Defendant's Motion for Disclosure of Impeachment Material  
15 Concerning Complaining Witness, The State notes that it has already  
16 disclosed any financial benefits provided to from Mohave County.  
17 , the Victim and Complaining Witness in the above-captioned case,  
18 did publish a book entitled *Stolen Innocence: My Story of Growing Up in a Polygamist*  
19 *Sect, Becoming a Teenage Bride, and Breaking Free of Warren Jeffs*. The State would  
20 also concede that the defense has requested disclosure of book contract  
21 and financial benefits that she has received concerning the now published book as well  
22 as any appearances in association with that book that the victim has made. However,  
23 is the victim in this cause number as "Victim" is defined in A.R.S. §13-  
24 4401(19). Furthermore, under A.R.S. §13-4433(A), the victim has a right to refuse any  
interview requests by the defense. Under A.R.S. §13-4433(C), "The prosecutor shall



1 Copy of the foregoing emailed  
this 24<sup>th</sup> day of November, 2009, to:

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By *Ben Brooks*