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VIRLYN TINNELL  
SUPERIOR COURT CLERK

1 PICCARRETA DAVIS PC  
 2 145 South Sixth Avenue  
 3 Tucson, AZ 85701-2007  
 4 (520) 622-6900  
 5 Michael L. Piccarreta  
 6 State Bar No. 003962  
 7 Jefferson Keenan  
 8 State Bar No. 013896  
 9 Attorneys for Defendant

-and-

8 WRIGHT STANISH & WINCKLER  
 9 300 S. Fourth Street, Suite 701  
 10 Las Vegas, NV 89101  
 11 (702) 382-4004  
 12 Richard A. Wright  
 13 Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

15	STATE OF ARIZONA,	)	NO. CR-2007-743
16		)	
17	Plaintiff,	)	MOTION TO DEPOSE
18	vs.	)	TEXAS LAW ENFORCEMENT
19		)	OFFICIALS
20	WARREN STEED JEFFS,	)	[Oral Argument Requested]
21		)	
22	Defendant.	)	[Hon. Steven F. Conn]
23		)	

22 The defendant, Warren Jeffs, by and through his counsel undersigned,  
 23 hereby respectfully requests this Court, pursuant to Rule 15.3 of the Arizona Rules  
 24 of Criminal Procedure, to order the depositions of Texas law enforcement officials  
 25 involved in the search and seizure of the defendant's property and property of the  
 26 Fundamental Church of Jesus Christ of Latter Day Saints in Eldorado, Texas.  
 27  
 28

1 Counsel undersigned has made repeated efforts to schedule the interviews  
2 of certain Texas law enforcement officials without success and these witnesses  
3 have not cooperated in granting a personal interview as yet. See Rule 15.3(a)(2)  
4 of the Arizona Rules of Criminal Procedure. This failure to grant personal  
5 interviews is slowing the process of analysis as to all of the issues raised in the  
6 motion to suppress. In addition, these Texas law enforcement officials are  
7 “persons [whose] testimony is material to the case” under Rule 15.3 because they  
8 have knowledge relating to the search of the FLDS Yearning for Zion Ranch in  
9 Texas, including information relating to whether the issues raised in defendant’s  
10 motion to suppress are “ripe” for adjudication at this time, and whether  
11 cooperating Arizona law enforcement officials have been “tainted” by exposure to  
12 evidence illegally seized in the raid of the Yearning for Zion Ranch.  
13  
14  
15  
16

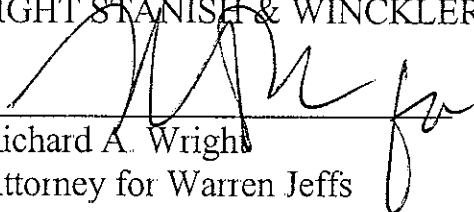
17 Accordingly, for the foregoing reasons, the defendant respectfully requests  
18 this Court to order the deposition of the following individuals to take place at a  
19 date, place, and time, mutually convenient to the parties:  
20

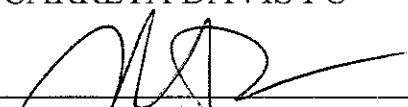
21 Sheriff David Doran (Schleicher County)  
22 Texas Ranger Brooks Long  
23 Deputy Sheriff John Connor (Schleicher County)  
24  
25  
26  
27  
28

1 RESPECTFULLY SUBMITTED this 16th day of October, 2008.

2 WRIGHT STANISH & WINCKLER

PICCARRETA DAVIS PC

3  
4 By   
5 Richard A. Wright  
6 Attorney for Warren Jeffs

By   
Michael L. Piccarreta  
Jefferson Keenan  
Attorneys for Warren Jeffs

7 Copy of the foregoing mailed  
8 this 16th day of October, 2008, to:

9 Clerk of Mohave County Superior Court  
10 401 East Spring Street  
11 Kingman, AZ 86401

12 Copy of the foregoing faxed and mailed  
13 this 16th day of October, 2008, to:

14 Hon. Steven F. Conn  
15 Mohave County Superior Court  
16 401 East Spring Street  
17 Kingman, AZ 86401  
18 Fax: 928-753-8938

19 Eric J.R. Nichols, Esq.  
20 Deputy Attorney General for  
21 Criminal Justice  
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25 Fax: (512) 936-0545

26 Copy of the foregoing emailed and  
27 mailed this 16th day of October, 2008, to:

28 Matthew J. Smith, Esq.  
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