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VIRGINIA ANNUNZIELLO
SUPERIOR COURT CLERK

PICCARRETA DAVIS PC
145 South Sixth Avenue
Tucson, AZ 85701-2007
(520) 622-6900
Michael L. Piccarreta
Pima County Computer No. 45199
Attorney for Defendant

-and-
WRIGHT STANISH & WINCKLER
300 S. Fourth Street, Suite 701
Las Vegas, NV 89101
(702) 382-2004
Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,)	NO CR-2007-743
)	
Plaintiff,)	DEFENDANT JEFFS' NOTICE
)	OF RULE 15.2 DISCLOSURE
vs.)	
)	
WARREN STEED JEFFS,)	
)	
Defendant.)	[Hon. Steven F Conn]

The defendant, Warren Steed Jeffs, by and through undersigned counsel, pursuant to Rule 15.2, Arizona Rules of Criminal Procedure, provides the following notice to the State:

I DEFENSES:

1. Not guilty.
2. Failure of proof beyond a reasonable doubt.
3. No intent or knowledge nor requisite *mens rea*.

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- 4. Failure to prove elements of offense.
- 5. Presumption of innocence.
- 6. Factual innocence.
- 7. Mistake of fact.
- 8. Mistake of law.
- 9. Consent.
- 10. Insufficiency of prior conviction.
- 11. Someone else committed alleged offense.
- 12. No causation.
- 13. Violation of defendant's First, Fourth and Fifth Amendment Rights.
- 14. Denial of defendant's constitutional rights under the compulsory

process clause of the Sixth Amendment and the due process clauses of the Fifth and Fourteenth Amendments of the United States Constitution and Articles 2 and 24 of the Arizona Constitution.

II. WITNESSES:

- A. The defendant will call any individuals listed in the police reports, grand jury transcript, and the State's disclosure or otherwise disclosed by the State.
- B. Defendant may call character witnesses and their names will be provided to the prosecutor as soon as they have been determined.
- C. Experts - Defendant may call Ken Driggs. At this time, defendant is

1 unaware of any other experts to be called at trial. If this position changes, counsel
2 will notify the prosecutor.
3

4 D. The defendant may call the following witnesses who, unless
5 otherwise indicated, may be contacted c/o Michael L. Piccarreta, Piccarreta Davis
6 PC, 145 S. 6th Ave., Tucson, AZ 85701, telephone: (520) 622-6900.
7

8 1. Jennie Pipkin

9 2. Kenneth "Ben" Thomas

10 3. Margaret Thomas

11 4. Joanna Keate

12 5. John Keate

13 6. Verleen Jessop

14 7. Charlotte Anna Jessop

15 8. Cristine Shapley

16 9. Merril Sunderland Shapley

17 10. Allen Steed

18 11. Roger H. Hoole, Esq., Hoole & King, LC, 4276 S. Highland
19 Drive, Salt Lake City, UT 84124, Telephone: 801-272-
20 7556.

21 12. Custodian of Records, The Diversity Foundation, 505 West
22 10200 South, South Jordan, Utah 84095, telephone: 801-
23 216-2122.

24 13. Lisa Pulitzer, c/o HarperCollins Publishers, 10 East 53rd
25 Street, New York, NY 10022, telephone: 212-207-7000.
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2 III. EXHIBITS/DOCUMENTS/OTHER EVIDENCE:

3 1 The defense expects to use any of the State's evidence and any other
4 evidence which may become known to the defense during the pretrial preparation
5 of this matter which tends to exculpate the defendant or otherwise supports his
6 defenses. Such evidence will be disclosed to the State when it becomes known and
7 available to the defense and when the defense expects to use it at trial.
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10 2 Book contracts, drafts of manuscript of the proposed book, and any
11 other financial benefits she received, agreements to provide information related to
12 the events associated with this matter, including book deals or appearance fees,
13 and any related payments or expenses
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15 3 The defense may use photographs of various residences and other
16 locations in and around the Colorado City/Hildale area including, but not limited
17 to, the Jeffs residence and surrounding environs. The defense may use additional
18 photographs of members of the community.
19

20 4 The defense may use physical evidence, including photographs,
21 charts, diagrams, results of tests, learned treatises, business or other records,
22 demonstrative evidence, and medical records.
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24 5 The defense may use Rule 15 witness statements (transcripts or
25 recordings) or other statements.
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27 6 The defense will use any witnesses named or referred to or other
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evidence either in its case-in-chief or in rebuttal.

7. The defense may use experts' reports (not yet identified) and other writings or materials relied upon in formulating expert opinions.

8. Upon request, all items will be made available for inspection at defense counsel's office, pursuant to Rule 15.2.

9. The defendant may use any and all papers, documents, photographs, and any other tangible objects listed in the State's disclosure.

10. The defendant may use any of the documents which are currently in the possession and control of the State which were seized from the defendant

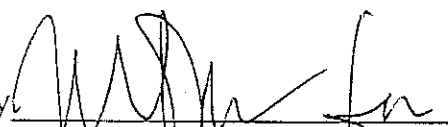
11. Defendant may use any or all of the tapes and/or transcripts which were made of the conversations between the agents, confidential informant, and defendant.


Defendant reserves the right to supplement this disclosure as other pretrial investigation is completed or additional disclosure is received from the State.

RESPECTFULLY SUBMITTED this 13th day of May, 2008

WRIGHT STANISH & WINCKLER

PICCARRETA DAVIS PC

By 
Richard A. Wright
Attorney for Warren Jeffs

By 
Michael L. Piccarreta
Jefferson Keenan
Attorneys for Warren Jeffs

FILED

1 Copy of the foregoing FedEx'd
2 this 13th day of May, 2008, to:

3 Clerk of Mohave County Superior Court
4 401 East Spring Street
5 Kingman, AZ 86401

6 Copy of the foregoing faxed and mailed
7 this 13th day of May, 2008, to:

8 Hon. Steven F. Conn
9 Mohave County Superior Court
10 401 East Spring Street
11 Kingman, AZ 86401
12 Fax: 928-753-8938

13 Copy of the foregoing emailed and
14 mailed this 13th day of May, 2008, to:

15 Matthew J. Smith, Esq.
16 Mohave County Attorney's Office
17 315 North Fourth Street
18 P.O. Box 7000
19 Kingman, AZ 86402-7000
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