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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 Email: mlp@pd-law.com
8 Jefferson Keenan
9 State Bar No. 013896
10 Email: jkeen@pd-law.com
11 Attorneys for Defendant

VIRALYNN TINNELL
SUPERIOR COURT CLERK

-and-
12 WRIGHT STANISH & WINCKLER
13 300 S. Fourth Street, Suite 701
14 Las Vegas, NV 89101
15 (702) 382-4004
16 Richard A. Wright
17 Email: rick@wswlawlv.com
18 Nevada Bar No. 000886
19 Attorney for Defendant

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

22 STATE OF ARIZONA,) NO. CR-2007-743
23)
24 Plaintiff,)
25 vs.) MOTION FOR DEPOSITION OF
26) WITNESS LAMONT BARLOW
27)
28 WARREN STEED JEFFS,)
) [Telephonic Oral Argument Requested]
) [Hon. Steven F. Conn]
)
)

29 The defendant, Warren Jeffs, by and through counsel undersigned, hereby
30 respectfully requests this Court, pursuant to Rule 15.3 of the Arizona Rules of
31 Criminal Procedure, to issue its order directing witness Lamont Barlow to be
32 deposed concerning recently acquired information.



1 Rule 15.3(a)(2) of the Arizona Rules of Criminal Procedure authorizes the
2 court to order to order the deposition of any person whose "testimony is material
3 to the case or necessary adequately to prepare a defense or to investigate the
4 offense" when "the person will not cooperate in granting a personal interview."
5 Although Mr. Barlow has submitted to a pretrial defense interview, the defendant
6 has just recently acquired information about false testimony given by his wife,
7 [REDACTED] the complaining witness in the present case about the defendant. A
8 report from Washington County Deputy Sheriff Jake Schultz indicates that
9 Lamont Barlow told witness Shannon Price about false testimony given by [REDACTED]
10 [REDACTED] in the prosecution of Mr. Jeffs in the state of Utah. Shannon Price reported
11 the information she learned from Lamont Barlow about [REDACTED] false
12 testimony to Washington County Attorney Brock Belnap and to Washington
13 County Deputy Jake Schultz. [See Report of Chief Deputy Jake Schultz, attached
14 hereto]. The issue has to do with the falsification of medical records and this
15 evidence will clearly be admissible to impeach [REDACTED] at the upcoming trial in
16 this matter. To date and quite understandably, Mr. Barlow has not cooperated in
17 granting an interview on the subject of this newly discovered and critical
18 evidence.¹

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¹ This matter is further complicated by the fact that attorney Roger Hoole represents Mr. Barlow and [REDACTED] and has received over \$1.7 million from the Diversity Foundation for his representation of Mr. Barlow, [REDACTED] and others. Ms. Shannon Price has been employed by

1 For the foregoing reasons, the defendant, Warren Jeffs, by and through his
2 counsel undersigned, hereby respectfully requests this Court to order the
3 deposition of Lamont Barlow to take place on March 16, 2010, at Parsons Behle
4 & Latimer, One Utah Center, 201 South Main Street, Suite 1800, Salt
5 Lake City, UT 84111, following the interview of Shannon Price. See
6 attached proposed order.
7
8

9 RESPECTFULLY SUBMITTED this 19th day of February, 2010.

10 WRIGHT STANISH & WINCKLER

11 By 
12

13 Richard A. Wright
14 Attorney for Warren Jeffs

PICCARRETA DAVIS PC

15 By 
16

17 Michael L. Piccarreta
18 Jefferson Keenan
19 Attorneys for Warren Jeffs
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25 the Diversity Foundation as its Foundation Director. Mr. Hoole has also claimed attorney
26 privilege issues regarding Diversity and its main financial supporter, Dan Fischer. Accordingly,
27 obvious issues have been raised concerning Mr. Hoole's simultaneous representation of these
28 individuals whose interests are now adverse to each other given the nature of the new
information provided by Ms. Price and Mr. Barlow about [REDACTED] potential criminal acts. See
Rule 42, Rules of the Arizona Supreme Court, ER 1.2, 1.7, 3.4 and 4.3.

1 Original of the foregoing mailed
2 this 18th day of February, 2010, to:

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

6 Copy of the foregoing emailed
7 this 18th day of February, 2010, to:

8 Hon. Steven F. Conn
9 Mohave County Superior Court
10 401 East Spring Street
11 Kingman, AZ 86401

12 Matthew J. Smith, Esq.
13 Mohave County Attorney's Office
14 315 North Fourth Street
15 P.O. Box 7000
16 Kingman, AZ 86402-7000

17 Roger Hoole, Esq.
18 4276 South Highland Drive
19 Salt Lake City, UT 84124
20
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WASHINGTON COUNTY SHERIFF'S OFFICE
INVESTIGATIONS REPORT

TO: COUNTY ATTORNEY BROCK BELNAP
FROM: CHIEF DEPUTY JAKE SCHULTZ
RE: WARREN JEFFS
SUBJECT: SHANNON PRICE INTERVIEW
DATE: 01/26/2010

I was contacted approximately three weeks ago by County Attorney Brock Belnap regarding Shannon Price. He indicated that he had run into Shannon at a conference in Tooele County and she told him that [REDACTED] had lied during her testimony at the Warren Jeffs trial. County Attorney Belnap asked me to contact Shannon and conduct a follow-up interview.

On 01/25/2010 at approximately 1400 hours, I was able to make contact with Shannon Price in reference to the state's case against Warren Jeffs. Shannon agreed to speak with me about the investigation. The interview was conducted by telephone from my office at the Purgatory Correctional Facility.

Shannon stated that she had heard that [REDACTED] had been dishonest about her medical records during the trial. She indicated that she did not have any direct knowledge of this, but did hear it from [REDACTED] husband, Lamont Barlow. Lamont told her that [REDACTED] medical records had all been created in one day, to make it look like she had seen a caretaker on several different occasions. She indicated that Lamont said he got that information from someone else, but he did not identify his source. Shannon could not recall many specific details regarding the conversation, but stated that it took place in close proximity to the Jeffs trial (either shortly before or shortly after). She indicated that she did not know exactly what [REDACTED] said that was untruthful nor did she know what specific medical records Lamont was referring to.

I provided Shannon with my contact information and asked her to contact me if she recalled any further information from her conversation with Lamont.

Submitted by Chief Deputy Jake Schultz 01-17-2010