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Tucson, AZ 85701-2007
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Michael L. Piccarreta
Pima County Computer No. 45199
Attorney for Defendant

FILED
BY: _____
2008 MAY 14 PM 1:39
VIRGINIA J. HULL
SUPERIOR COURT CLERK

-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*.

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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III. EXHIBITS/DOCUMENTS/OTHER EVIDENCE:

1. The defense expects to use any of the State's evidence and any other evidence which may become known to the defense during the pretrial preparation of this matter which tends to exculpate the defendant or otherwise supports his defenses. Such evidence will be disclosed to the State when it becomes known and available to the defense and when the defense expects to use it at trial.

2. Book contracts, drafts of manuscript of the proposed book, and any other financial benefits she received, agreements to provide information related to the events associated with this matter, including book deals or appearance fees, and any related payments or expenses.

3. The defense may use photographs of various residences and other locations in and around the Colorado City/Hildale area including, but not limited to, the Jeffs residence and surrounding environs. The defense may use additional photographs of members of the community.

4. The defense may use physical evidence, including photographs, charts, diagrams, results of tests, learned treatises, business or other records, demonstrative evidence, and medical records.

5. The defense may use Rule 15 witness statements (transcripts or recordings) or other statements.

6. The defense will use any witnesses named or referred to or other

1 evidence either in its case-in-chief or in rebuttal.

2 7. The defense may use experts' reports (not yet identified) and other
3 writings or materials relied upon in formulating expert opinions.
4

5 8. Upon request, all items will be made available for inspection at
6 defense counsel's office, pursuant to Rule 15.2.
7

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

10 10. The defendant may use any of the documents which are currently in
11 the possession and control of the State which were seized from the defendant
12

13 11. Defendant may use any or all of the tapes and/or transcripts which
14 were made of the conversations between the agents, confidential informant, and
15 defendant.
16

17 Defendant reserves the right to supplement this disclosure as other pretrial
18 investigation is completed or additional disclosure is received from the State.
19

20 RESPECTFULLY SUBMITTED this 13th day of May, 2008

21 WRIGHT STANISH & WINCKLER

PICCARRETA DAVIS PC

22
23 By  _____

24 Richard A. Wright
25 Attorney for Warren Jeffs
26

22
23 By  _____

24 Michael L. Piccarreta
25 Jefferson Keenan
26 Attorneys for Warren Jeffs
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Copy of the foregoing FedEx'd
this 13th day of May, 2008, to:

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

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

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

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

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