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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 & CR-2007-953

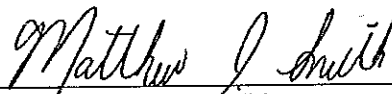
RESPONSE TO MOTION
FOR DEPOSITION OF WITNESS
CAROLYN JESSOP

13 COMES NOW, the State of Arizona, by the Mohave County Attorney, and hereby
14 moves the Court to deny Defendant's Request to Depose State's Witness Carolyn
15 Jessop. Carolyn Jessop has already cooperated in granting the defense two previous
16 interviews in this case. Both of the interviews took place in Salt Lake City and were
17 face-to-face interviews. Both of the interviews were lengthy and transcribed by a court
18 reporter. The defense wants to interview Carolyn a third time concerning her tax
19 returns, which are not discoverable in this case. Carolyn has provided the defense and
20 the State with a copy of all of her contracts concerning her first book as well as the book
21 that she is currently working on. Since these contracts have already been disclosed to
22 the defense, the defense has all the materials they need to effectively cross-examine
23 Carolyn Jessop. Although Carolyn at one time indicated a willingness to turn over her
24 tax returns, she has changed her mind and no longer desires to comply with this
25 defense request. However, the defense is not entitled to her tax returns and has
already asked Carolyn numerous questions about her book, her book contracts, the

1 potential movie based on her book, as well as other questions concerning monies she's
2 received not only from the book, but from Dr. Dan Fischer and Diversity Foundation.
3 Carolyn has spent a couple of hours answering questions concerning the financial
4 benefits she has received from Dr. Fischer, Diversity and her book, as this subject has
5 been exhaustedly pursued by the defense. The fact that Carolyn does not wish to
6 provide her tax returns, which are a private matter for any citizen, is not a reason for
7 court-ordered disclosure of those tax returns or to re-interview Carolyn for the third time.

8 For these reasons, particularly since she has already given two interviews and
9 the defense now has the necessary contracts that they have requested, the State
10 requests that the Court deny Defendant's Motion to Depose Carolyn Jessop.

11 RESPECTFULLY SUBMITTED THIS 24th day November, 2009.

12 
13 _____
14 MATTHEW J. SMITH
15 MOHAVE COUNTY ATTORNEY

16 Copy of the foregoing delivered this 24th day of
17 November, 2009, to:

18 HONORABLE STEVEN F. CONN
19 SUPERIOR COURT JUDGE

20 Copy of the foregoing emailed
21 this 24th day of November, 2009, to:

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By *Ben Brooks*