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VIRLYNN TINNELL  
SUPERIOR COURT CLERK

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7

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

10	STATE OF ARIZONA,	)	Case No.: CR 2010-0821
		)	
11	Plaintiff,	)	DEFENDANT'S RULE 15.2 DISCLOSURE
		)	AND REQUEST OF DEFENSE
12	vs.	)	INTERVIEWS
		)	
13	CASSLYN M. WELCH,	)	
		)	
14	Defendant	)	
		)	
15		)	

16 Pursuant to Rule 15.2, 17 A.R.S. Rules of Criminal Procedure, Defendant, through  
17 counsel, hereby makes the following disclosure:

18 I. Defenses:

19 Defendant may rely on those defenses checked below:

- 20 1) Failure of State to prove elements of offense.

21 II. Witnesses

22 Defendant may call all persons named or referred to in the State's disclosure with respect  
23 to each of the designated defenses; the defendant himself may testify to each of the designated  
24 defenses. Additionally, defendant may call:

	<u>NAME</u>	<u>ADDRESS</u>	<u>TESTIFY AS TO DEFENSE NO.</u>
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- 25 1) Names disclosed when known.



1  
2 **III. Request For Full And Prompt Disclosure**

3 To date, the State has either failed to provide disclosure or has only disclosed standard  
4 police reports containing limited information consisting primarily of the opinions of the officers  
5 involved in this case. Until the State makes full disclosure and until interviews can be conducted  
6 with the witnesses in this case, the defense is unable to make its full disclosure. The defendant  
7 therefore requests pursuant to Rule 15 A.R.Cr.P. 1) complete disclosure of all witness  
8 statements; 2) all Brady material; 3) all 404(b) prior bad act evidence; 4) 609 character evidence  
9 for all of the State's witnesses; and 5) interviews with all State witnesses. Prompt and good faith  
10 compliance with this request will serve to keep this case on track and help to guarantee a prompt  
11 resolution of this matter.

12 **IV. EXHIBITS**

13 Defendant may use papers, documents, photographs, charts, diagrams, test results and  
14 other tangible objects at trial. Inspection may be arranged upon reasonable notice to defense  
15 counsel.

16 RESPECTFULLY SUBMITTED this 23th day of August, 2010.

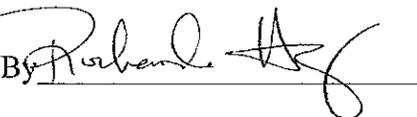
17 **The Glazer Law Office, PLLC**

18   
19 \_\_\_\_\_  
20 Stephen R. Glazer  
21 Attorney For Defendant

22 Original filed by mail with the Clerk  
23 Of the Court and Copies of the foregoing  
24 delivered or mailed this  
25 23th day of August, 2010, to:

Mohave County Attorney's Office  
PO Box 7000  
Kingman, AZ 86402-7000

Casslyn M. Welch

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