

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. KPNX uses cameras that do not require additional lighting. Additionally, KPNX's cameras are virtually silent and would not be connected to cables or power cords.

4. A KPNX photojournalist would need minimal space to cover the proceedings in this matter. The photojournalist would require only enough space in the back of the courtroom to set up a small tripod. Typically, KPNX sets up its camera on the same side of the courtroom as the jury box to avoid inadvertently photographing the jury.

5. During the 12 years I have worked at KPNX, the Station has never photographed a juror during a trial in a manner that would identify the juror.

6. If the Court allows cameras at the Trial, KPNX shall observe all restrictions on television coverage ordered by the Court. If ordered at any time by this Court to discontinue taping of the proceedings, KPNX would immediately cease all taping until permitted by the Court to resume.

7. Camera access to these proceedings is an essential means of providing news to the public of what transpires in the courtroom.

I declare under penalty of perjury under the laws of the United States and the State of Arizona that the foregoing is true and correct.

Executed on this 6th day of May, 2011, in Phoenix, Arizona.

By 
Jerome Parra

1 Original of the foregoing shipped via FedEx
2 for filing with the Clerk of the Court this 9th day of
3 May, 2011, and

4 A copy of the foregoing was delivered
5 this same day via facsimile and U.S. Mail to:

6 Hon. Steven F. Conn
7 Division 3
8 Mohave County Superior Court
9 401 Spring Street
10 Kingman, AZ 86401
11 Facsimile: 928-753-0781

12 COPY of the foregoing served via
13 facsimile and US Mail this same day to:

14 Matthew J. Smith
15 Mohave County Attorney
16 315 N. 4th Street
17 Kingman, AZ 86401
18 Facsimile: 928-753-2669
19 Attorney for the State of Arizona

20 John Pecchia
21 Mohave County Public Defender
22 318 N. 5th Street
23 Kingman, AZ 86401
24 Fax Number: (928) 753-0793
25 Attorney for Defendant McCluskey

26
27
28
