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FILED
2015 MAY 22 AM 10:04

WILSON TUNNELL
SUPERIOR COURT CLERK

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

STATE OF ARIZONA,

Plaintiff,

vs.

JUSTIN JAMES RECTOR

Defendant.

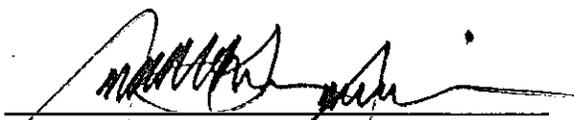
NO: CR 2014-01193

DEFENDANT'S REPLY TO STATE'S
RESPONSE TO DEFENDANT'S MOTION
TO IDENTIFY INFORMANTS

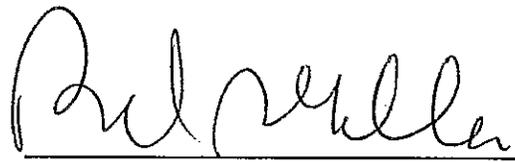
(ASSIGNED TO THE HON. LEE JANTZEN)

Defendant Justin James Rector, by and through undersigned counsel, replies to the State Response to Defendant's Motion to Identify Informants, for the reasons contained in the Memorandum attached hereto and incorporated herein.

RESPECTFULLY SUBMITTED This 22nd day of May, 2015.



GERALD T. GAVIN
Co-Counsel for Mr. Rector



RON GILLES
Co-Counsel for Mr. Rector



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M E M O R A N D U M

Counsel for the State cites, in ongoing opposition and in relevant part, to Defendant's motions to the Court, Local Rule CR-8, regarding compelling production of materials or seeking sanctions for failure to comply with the rules of disclosure, or other court order.....

The defense would answer as thus:

1) The defense has made voluminous requests, through motion practice, for various items from the State. Except for 1 very recent exception, the State has asked the Court to deny *every single request* made to the court, including such innocuous requests like moving to make a complete, accurate record for appeal for the benefit of all the parties: the Court, the State and the Defense; Motion for Disclosure, including all Brady material in the State's possession, Motion to Prevent Destruction of Evidence without Notifying the Defense First, Motion to have all discussions on the case be made formal and put on the record, (to protect all the parties from appellate speculation as to possible agreements and discussions off the record). Simply put, the State has to date disagreed with nearly everything the Defense has requested. This issue is so important, and the near absolute non-cooperation already displayed by the State, the defense simply wanted to make an accurate, on-the-record request and get a simple answer. The defense has no information a "snitch" was being used; a simple one line Reply from the State would have made an accurate record.

As it stands, the State indicates it has no "snitch" or confidential informant being used on this case. The defense takes the State at its word. Should that situation change, the defense expects our colleague from the State will immediately comply with Rule 15 and notify the Defense and Court that an informant was being used. The defense believes our colleague from the State would do so. At that point, the requests

1 for material in that motion would be relevant and the request for materials would
2 immediately be renewed and requested again. The defense does not expect further
3 litigation in this area unless the State attempted to secretly employ such an informant
4 after this motion; the Defense expects the State will not do that, and will honor its
5 obligations.

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1 ORIGINAL of the foregoing filed
this 22nd day of May, 2015 with:

2
3 Clerk of Court
4 401 E Spring Street
5 Kingman Arizona 86401

6 COPY of the foregoing
7 Delivered this 22nd day
8 Of May, 2015, to:

9 Honorable Lee Jantzen
10 Judge of the Superior Court
11 Mohave County Courthouse
12 2nd floor
13 Kingman Arizona 86401

14 Greg McPhillips
15 Assigned Deputy County Attorney
16 PO Box 7000
17 Kingman Arizona 86401

18 Ron Gilleo
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20 Co-Counsel for Justin James Rector
21 313 Pine Street
22 PO Box 7000
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24 Client Justin James Rector
25 Mohave County Jail

26 File

27 BY: 