

1 **DAVID W. ROZEMA**
2 **COCONINO COUNTY ATTORNEY**

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FILED

12 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
13 **IN AND FOR THE COUNTY OF COCONINO**

14 STATE OF ARIZONA,
15
16 Plaintiff,
17
18 vs.
19
20 STEVEN EDWARD JONES,
21
22 Defendant.

No. CR2015-00862

NOTICE OF RULE 15.1(b)
DISCLOSURE BY THE STATE

(The Honorable Dan R. Slayton -
Division 2)

23 Pursuant to Rule 15.1(b) of the Arizona Rules of Criminal Procedure, the State of
24 Arizona hereby provides the following disclosure:

- 25 **(1) The names and addresses of all persons whom the prosecutor**
26 **intends to call as witnesses in the case-in-chief:**

NORTHERN ARIZONA UNIVERSITY POLICE DEPT (928) 523-3611

Andres Godinez (Officer)
Bradley Mihalik (Lieutenant)
Christopher Anderson (Officer)
Jacob Brady (Officer)
Keegan Park (Officer)
Kenneth Hunter (Corporal)
Lance Wigley (Sergeant)
Matthew Hinte (Officer)
Mike O'Hagan (Sergeant)
Theresa Wigley (Evidence Tech)

FLAGSTAFF POLICE DEPARTMENT (928) 774-1414

Adrian Barreras (Detective)
Alex Chirovsky (Officer)
Bradley Battaglia (Officer)
Casey Rucker (Detective)

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1 Christopher Waters (Officer)
2 Daniel Beckwith (Officer)
3 Dustin Hemp (Officer)
4 Gilbert Herrera (Officer)
5 Jason Cota (Officer)
6 Jolene Coules (Detective)
7 Joseph Candelaria (Officer)
8 Kelly Ingram (Officer)
9 Kelsea Koustik (Officer)
10 Kevin Sapp (Officer)
11 Matthew Schmidt (Officer)
12 Melanie Montano (Officer)
13 Michael Priest (Officer)
14 Michael Rodriguez (Detective)
15 Michael Slayton (Detective)
16 Nick Jacobellis (Detective)
17 Ryan Beckman (Sergeant)
18 Ryan Turley (Detective)
19 Shawn Knott (Detective)
20 Todd Bishop (Sergeant)
21 Todd Laughlin (Officer)
22 Todd Martinet (Detective)

COCONINO COUNTY SHERIFF'S OFFICE (928) 774-4523

Andrew Silverstein (Deputy)
Dennis McCabe (Corporal)
Mikkel Libarle (Deputy)
Tristan Meyer (Detective)

BUREAU OF ALCOHOL, TOBACCO, & EXPLOSIVES (928) 779-4585

Fletcher Ogg (Special Agent)
Shawn Murray (Special Agent)

FEDERAL BUREAU OF INVESTIGATION (928) 774-0631

Brian Fuller (Agent)
Charles Davis (Agent)
Dawn Martin (Agent)
Eric Stoddard (Agent)

FLAGSTAFF FIRE DEPARTMENT (928) 213-2500

Chris Samples
Russell Lane

CIVILIANS (see police reports for contact information)

Kyle Zientek (VICTIM)
Nicholas Prato (VICTIM)
Nicholas Piring (VICTIM)
Abbey Norcutt
Adam Johnson
Allison Kelly

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- 1 Amanda Conrad
- 2 Andrew Walsh
- 3 Anthony Rusk
- 4 Austin Contreras
- 5 Avery Jones
- 6 Blake Renfrow
- 7 Brandon Emerine
- 8 Brandon Routley
- 9 Carlos Rios
- 10 Chase Irwin
- 11 Chase Jones
- 12 Christopher Lewis
- 13 Cody Cooper
- 14 Cole Delaney
- 15 Courtney Waked
- 16 Dane Fortenberry
- 17 Daulton Shields
- 18 David Prada
- 19 Domonique Penn
- 20 Emilee Coultrap
- 21 Gabriel Sam
- 22 Garrett Harper
- 23 Giulietta Cala
- 24 Hunter Todd
- 25 Ian Thompson
- 26 Isabel Weintraub
- Jackson Toothman
- Jacob Mike
- Jami Donaldson
- Jay Stokes
- Jonathan Weber
- Jordon Martinez
- Justin Brown
- Katarina Tatkin
- Kayla DeFrates
- Kayla Hartman
- Kelly Johnston
- Kiajai Crouch
- Michael Mullen
- Michelle Leonard
- Michelle Schatz
- Miqui Scollard
- Monica Overturf
- Nicholas Acevedo
- Nicholas Pletke
- Paloma Rochin
- Ralph Garcia
- Rhyam Williams
- Samuel Kingery
- Shay McConnell

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1 Taylor Sanders
2 Trevor Unger
3 Tristan Page
4 Valerie Pabon
5 Victoria Campbell
6 Vincenzo Ricco
7 Zach Volpo
8 Zakia Alameri

9 **And any witness listed by the defendant. The State's witness list**
10 **may be supplemented at a later date. However, the State anticipates that the**
11 **above list will be considerably shortened for trial.**

12 **(2) All statements of the defendant and of any person who will be**
13 **tried with the defendant:**

14 All of the Defendant's statements which have been recorded, reduced to writing,
15 or of which a transcript is available are in the disclosure materials.

16 **(3) All original and supplemental reports prepared by law**
17 **enforcement agency in connection with the particular crime**
18 **with which the defendant is charged.**

19 The State's disclosure includes initial and supplemental police reports, witness
20 statements, scientific examination reports of experiments or comparisons that have
21 been completed, and all other documents bearing **Bates Stamp # 1 - 431 and Media**
22 **Discs # 1 - 61**, as previously disclosed.

23 **(4) The names and addresses of experts who have personally examined**
24 **a defendant or any evidence in the particular case, together with the**
25 **results of physical examinations and of the scientific tests,**
26 **experiments or comparisons that have been completed.**

The State will use the testimony of any expert witness whose report is included
in the disclosure materials, or who is otherwise mentioned in the disclosure materials.
The State may also call Arizona Department of Public Safety Crime Lab criminalists to
provide expert testimony, to wit:

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<u>NAME</u>	<u>ADDRESS</u>
Sheila Azutillo	AZ DPS Northern Reg. Crime Lab, 928-773-3687
Melissa Verhaeghe	AZ DPS Northern Reg. Crime Lab, 928-773-3687
Medical Examiner	Coconino Co. Office of the Med. Exam., 928-679-8775
FMC Personnel	Flagstaff Medical Center, 928-779-3366

TO BE SUPPLEMENTED AT A LATER DATE IF NECESSARY

- (5) **A list of all papers, documents, photograph or tangible objects that the prosecutor intends to use at trial or which were obtained from or purportedly belong to the defendant:**

The State will use any items listed in or referred to in the disclosure materials, the Indictment and Grand Jury Transcript, or in the Information and Preliminary Hearing Transcript. Such disclosure includes the following:

- POLICE REPORTS
- CRIME LAB REPORTS
- SEARCH WARRANTS
- AUTOPSY REPORT
- MEDICAL RECORDS
- PHOTOS
- DIAGRAMS
- MAPS
- CHARTS
- TEXT MESSAGES
- AUDIO RECORDINGS
- VIDEO RECORDINGS
- CLOTHING (PHYSICAL EVIDENCE)
- WEAPONS, SHELL CASINGS, BULLETS (PHYSICAL EVIDENCE)
- TO BE SUPPLEMENTED AT A LATER DATE IF APPLICABLE

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1 All items are available for inspection at the Coconino County Attorney's Office, or
2 the office of the appropriate law enforcement agency, pursuant to Rule 15.1(e).
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4

- 5 **(6) A list of all prior felony convictions of the defendant which the**
6 **prosecutor intends to use at trial.**

7 NONE KNOWN AT THIS TIME. TO BE SUPPLEMENTED AT A LATER
8 DATE IF APPLICABLE.

- 9 **(7) A list of all other acts of the defendant which the prosecutor intends**
10 **to use to prove motive, intent, or knowledge or otherwise use at trial.**

11 NONE KNOWN AT THIS TIME. TO BE SUPPLEMENTED AT A LATER
12 DATE IF APPLICABLE.

- 13 **(8) All material which tends to mitigate or negate the defendant's**
14 **guilt as to the offense charged or which would tend to reduce**
15 **the defendant's punishment therefore.**

16 NONE KNOWN AT THIS TIME. TO BE SUPPLEMENTED AT A LATER
17 DATE IF APPLICABLE.

- 18 **(9) Electronic surveillance of any conversations to which defendant was**
19 **a party or of the defendant's business or residence.**

20 JAIL RECORDINGS (PHONE CALLS AND VIDEO VISITATIONS). TO
21 BE SUPPLEMENTED AT A LATER DATE IF APPLICABLE.

- 22 **(10) Search warrants executed in connection with this case.**

- 23 • SW OF DEFENDANT'S VEHICLE
24 • SW OF DEFENDANT'S DORM ROOM
25 • SW OF VICTIMS' RESIDENCE (FRANKLIN AVE.)
26 • SW OF CELL PHONES


- (11) Informant information, subject to Rule 15.4(b)(2).**

NONE IN THIS CASE.

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RESPECTFULLY SUBMITTED this 18 day of November, 2015.

DAVID W. ROZEMA
COCONINO COUNTY ATTORNEY

By 
Ammon Barker
Deputy County Attorney

COPY of the foregoing
mailed/delivered this
18th day of November, 2015,
to.

The Honorable Dan R. Slayton
Division 2
Coconino County Courthouse
Flagstaff, AZ 86001

Burges McCowan
Attorney for the Defendant

By:  _____

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