

2008 DEC -3 AM 11: 52

SHIRLEY L. CLERK
APACHE COUNTY SUPERIOR COURT

2

The Wood Law Office
201 S White Mountain Rd.
Show Low, AZ 85901
928-837-5799
RONALD D. WOOD, ASB # 10751
BENJAMIN M. BREWER, ASB # 18251
DIRK LEGATE, ASB #22924

**IN THE SUPERIOR COURT, STATE OF ARIZONA
APACHE COUNTY, JUVENILE DIVISION**

In the Matter of:)	
)	Case No. JV 2008-065
Christian Ryan Romero)	
)	Request for Appointment of Therapist for
)	Juvenile & ORDER
A person under 18 years)	

The Juvenile, through counsel and pursuant to the Rules of Juvenile Procedure, requests the Court appoint Betty Beaumont of FamilyFirst Counseling & Behavioral Health Services, Inc as a therapist for the Juvenile for the sole purpose of communicating with the child to assist in any therapeutic healing/emotional support that may be necessary, without the fear of those communications being used against him in anyway and for any purpose Presently, the child cannot speak frankly with his mother, as she may be called as a witness against him. And, although, any communication with counsel is covered by the privilege, counsel is not equipped with the necessary skills to assist the Juvenile in any therapeutic/emotional recovery. Therefore, a therapist is needed to assist the juvenile in dealing with issues he may have as well to as ensure all those communications are held in confidence. The sole purpose is for emotional support, such as stress management, relaxation skills, etc , and not for treatment of a specific diagnosis.

Counsel can only agree to this appointment if the Court can guarantee that Ms. Beaumont and any staff members or employees of FamilyFirst Counseling will not be able to be called as a witness in this matter for any purpose or by any party, including

Court staff, probation, detention, prosecution, etc. In addition, the Court must guarantee that any records generated by Ms. Beaumont or any staff members or employees of FamilyFirst Counseling will not be subject to the subpoena power for any purpose, or released to anyone for any reason whatsoever.

It is further requested that Ms. Beaumont be allowed to bring with her, into the detention facility, those items she deems necessary to assist in her counseling sessions, provided they are approved by detention staff.

Further, Ms. Beaumont has been assured by defense counsel that in the event the Juvenile gives her information that requires her to report any abuse of the Juvenile to the proper authorities, she would **not** be so required, given that information has already been provided to child protective services and other agencies. In addition, she would be working on behalf of the defense and covered under the privilege.

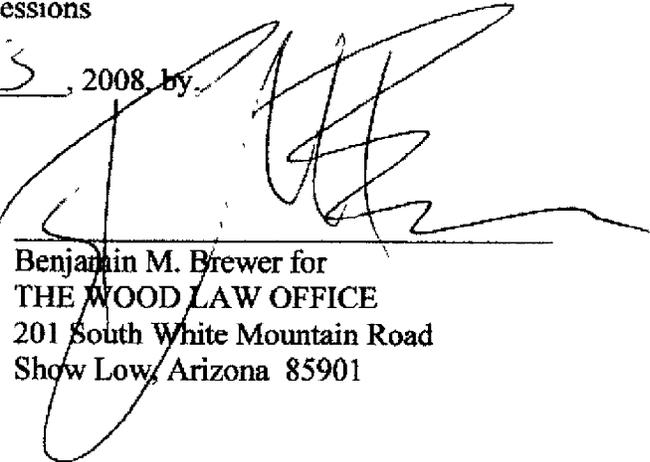
Further, it is requested the Court order the Juvenile Detention Center to ensure Ms. Beaumont has a private place, where discussions cannot be heard by detention staff, where she and the Juvenile may speak freely with one another.

Lastly, defense counsel for the Juvenile would need to be exempt from any of these aforementioned preclusions pertaining to discussions, documents, interviews, etc., regarding the session between Ms. Beaumont and the Juvenile. Because Ms. Beaumont works on behalf of the defense team, and the defense team is subject to confidentiality, she would be authorized to share any information gleaned from visits with the Juvenile to defense counsel without fear of sanction.

If those conditions are agreeable counsel would request the Court appoint Betty Beaumont from FamilyFirst Counseling & Behavioral Health Services Inc., for the aforementioned purpose, at a rate of 100.00 dollars per hour.

If the state timely objects in writing and can demonstrate standing, counsel would request this matter be set for a hearing, otherwise the Court should grant the request and allow the Juvenile to begin the counseling sessions

Respectfully submitted, December 3, 2008, by.



Benjamin M. Brewer for
THE WOOD LAW OFFICE
201 South White Mountain Road
Show Low, Arizona 85901

Copies to
Judge Roca
Apache County Attorney's Office
Juvenile Detention
Ms Beaumont, FamilyFirst Counseling & Behavioral Health Services, Inc.