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1 MICHAEL B. WHITING
2 APACHE COUNTY ATTORNEY
3 P.O. Box 637
4 St. Johns, AZ 85936
5 C. Allan Perkins
6 Chief Deputy County Attorney
7 State Bar No. 015239
8 groupmail@apachelaw.net
9 P.O. Box 637
10 St. Johns, AZ 85936-0637
11 ☎ 928.337.7560 ☎ 938.337.2427

8 IN THE JUVENILE COURT OF THE STATE OF ARIZONA
9 IN AND FOR THE COUNTY OF APACHE

10 IN THE MATTER OF:

JV 2008-065

11 CHRISTIAN RYAN ROMERO,
12 A person under 18 years of age

13 RESPONSE TO JUVENILE'S REQUEST
14 FOR ADDITIONAL DISCLOSURE

15 THE STATE, through C. Allan Perkins, Chief Deputy County Attorney, hereby moves this
16 Court to deny juvenile's request for additional disclosure. Juvenile has requested this Court to order
17 the State to provide records of juvenile adjudications of the alleged victims listed in the pending
18 Petition to Revoke Probation in the above entitled matter. Juvenile cites *State v. Van Den Berg*, 164
19 Ariz. 192, 791 P.2d 1075 (App. 1990) as authority that juvenile records are admissible for
20 impeachment of witnesses. Whether the Court of Appeals decision is applicable to testimony in a
21 juvenile probation revocation proceeding is arguable. However, as the State does not intend to call
22 any of the listed juvenile victims as witnesses, Juvenile's argument is moot. The State therefore
23 respectfully requests this Court to deny juvenile's request.

24 Respectfully submitted this 6th day of April, 2012.

25
26 
27 C. ALLAN PERKINS
28 Chief Deputy County Attorney

1 A COPY of the foregoing
2 mailed/delivered this
3 6th day of April,
4 212, to:

5 Honorable Monica L. Stauffer
6 P.O. Box 1296
7 Clifton, AZ 85533
8 (928) 865-5358

9 Apache County Clerk of the Superior Court
10 P.O. Box 365
11 St. Johns, AZ 85936

12 Marsha Gregory
13 Guardian Ad Litem
14 (928) 333-3229

15 Ron Wood
16 Attorney for Juvenile
17 P.O. Box 969
18 Show Low, AZ 85901
19 (928)537-8864

20 Juvenile Probation
21 309 S. Mountain Ave., Suite 8
22 Springerville, AZ 85938
23 (928) 333-2110
24
25
26
27
28