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APACHE COUNTY SUPERIOR COURT

CRISS E. CANDELARIA  
Apache County Attorney  
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Attorney for the State  
Attorney ID # 013179

IN THE JUVENILE COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF APACHE

In the Matter of:	NO. JV2008-065
CHRISTIAN RYAN ROMERO,	STATE'S DISCLOSURE
A Person under 18.	

COMES NOW the State of Arizona, by and through the undersigned, Deputy Apache County Attorney pursuant to Rule 15.1, Arizona Rules of Criminal Procedure, to disclose the following:

1. WITNESSES:

Ofc. D. Neckel, SJPd, St. Johns, AZ  
Sgt. L. Rodriguez, SJPd, St. Johns, AZ  
Cmdr. M. Avila, ACSO, St. Johns, AZ  
Sgt. R. Guinn, ACSO, St. Johns, AZ  
Cmdr. A. Hunt, ACSO, St. Johns, AZ  
Chf. R. Melnick, SJPd, St. Johns, AZ  
Bryce Burnham, Burnham Mortuary, Eagar, AZ  
Sgt. J. Scruggs, ACSO, St. Johns, AZ  
Dep. C. Wallace, ACSO, St. Johns, AZ  
Dep. R. Watkins, ACSO, St. Johns, AZ  
Sgt. W. Hogle, ACSO, St. Johns, AZ  
Dr. Porterfield, Medical Examiner, Pima County,  
Tucson, AZ  
Cmdr. J. Womack, ACCENT, St. Johns, AZ  
Flynt Smith, SRP Employee, St. Johns, AZ  
Delbert Richardson, Zachry Construction Corporation  
Mark Mercer, Zachry Construction Corporation  
Kevin Counts, Zachry Construction Corporation  
Joe Romero, SRP Employee, St. Johns, AZ  
Claudine Lee, Mickey's Bar Manager, St. Johns, AZ  
Edgar Aranda, St. Johns, AZ  
Misty Belote, Mickey's Bar Maid, St. Johns, AZ

Kevin Phipps, Zachry Construction Corporation  
 Dana Michael Cavanaugh, Zachry Construction Corporation  
 Jason Robert Landreneaux, Zachry Construction Corporation  
 Tiffany Duvall, victim c/o SJPD, St. Johns, AZ  
 Liz Romero, victim c/o SJPD, St. Johns, AZ  
 Leroy Romero, victim c/o SJPD, St. Johns, AZ  
 Eryn Thomas  
 Tanya Romans, victim c/o SJPD, St. Johns, AZ  
 Criminalist, DPS Crime Lab

2. ATTACHMENTS;

4-DVDs/CDs containing interview of the Juvenile;  
 photographs of scene, mortuary and autopsy (to be hand  
 delivered on 11/18/08)

SJPD DR No. 08110735/Det. D. Neckel (pgs. 000001 -  
 000004)

Juvenile Detention Intake Forms (pgs. 000005 - 000018)

ACSO DR No. 08-111566/Sgt. R. Guinn (pgs. 0000019 -  
 000023)

ACCENT DR No. 08-2496/Cmdr. J. Womack (pgs. 000024 -  
 000033)

ACSO DR No. 08-111566/Cmdr. M. Avila (pgs. 000034 -  
 000045)

(All reports will be e-mailed to defense attorney)

3. OTHER:

	<u>YES</u>	<u>NO</u>	<u>PENDING</u>
Crime Lab Expert	x		
Fingerprint Expert	x		
Lab Report	x		
Search Warrant	x		
Interview	x		
Known Priors		x	
Cert. MVD Records		x	
Intoxilyzer Records		x	

If applicable, proof of the defendant's prior conviction will include (1) opinion testimony of a qualified fingerprint examiner, (2) 803(8)(B) business records of law enforcement agencies from the place of the prior arrest and conviction: booking records, fingerprint cards, and photos of defendant (see State vs. Best, 146 Ariz. 1, 3-4, 703 P.2d 548, 550-51 (App. 1985)).

**RULE 15 DISCLOSURE**

The Apache County Attorney, Criss E. Candelaria, pursuant to Rule 15 of the Arizona Rules of Criminal Procedure, provides those matters discoverable which may be used as evidence in the case-in-chief and as rebuttal evidence in the above entitled case.

**I. Defendant's Statements:**

The State will use any of the defendant(s) statements, whether to law enforcement officers or otherwise, which are summarized or alluded to in the disclosure materials, or of which a transcript has been provided.

**II. Experts Consulted:**

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.

**III. Physical Evidence:**

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.

The State will use photos, charts, or diagrams, if applicable.

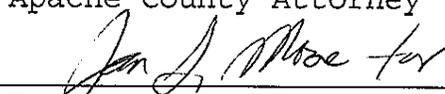
The State will use bank statements, business records and/or certified copies of court documents if applicable to this case.

The State will use both the known and unknown samples or exemplars which were tested in any case involving identification by means of fingerprints, palm prints, footprints, voice, handwriting, hair, blood, saliva, urine, or any other substance of material which could be included under the provisions of Rule 15.2(a).

RESPECTFULLY submitted this 18<sup>th</sup> day of November, 2008.

CRISS E. CANDELARIA  
Apache County Attorney

BY:

  
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Bradley W. Carlyon  
Special Deputy County Attorney

A copy of the foregoing  
mailed/delivered this  
18<sup>th</sup> day of November, 2008, to:

The Wood Law Office  
Attorney for the Juvenile

B. Henares