

2008 NOV 14 PM 4:49

SUE HALL, CLERK  
APACHE COUNTY SUPERIOR COURT

1 CRISS E. CANDELARIA  
APACHE COUNTY ATTORNEY

2 Bradley W. Carlyon  
Chief Deputy County Attorney  
3 Bar ID#: 013179

4 Post Office Box 637  
St. Johns, AZ 85936  
5 Telephone: (928) 337-7560  
6 Attorney for Petitioner

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
8 IN AND FOR THE COUNTY OF APACHE

9  
10 IN THE MATTER OF

11 **CHRISTIAN RYAN ROMERO**

12 A person under 18 years of age  
13

} Case No. JV 2008-065

} **STATE'S RESPONSE TO MOTION FOR  
INITIAL DISCLOSURE**

} (Assigned to the Honorable Michael Roca,  
Judge *Pro Tem*)

14  
15 The State of Arizona, by and through undersigned counsel, hereby responds to  
16 the "Motion for Initial Disclosure dated November 13, 2008.

17 The Juvenile's Motion is premature. As the juvenile notes, pursuant to Rule 16,  
18 Arizona Rules of Procedure for Juvenile Court, the initial disclosure is not due until  
19 November 17, 2008.

20 The State has been disclosing materials to the juvenile's counsel promptly after  
21 receiving it and will continue to do so throughout the pendency of this case. It has been  
22 communicated to the various entities working on this case then need to generate  
23 reports in a prompt manner.

24 As juvenile's counsel is aware, some agencies will not have reports generated by  
25 November 17<sup>th</sup>. For example, the Arizona Department of Public Safety Crime Lab will  
26 not have any reports generated by the 17<sup>th</sup>. Similarly, the autopsy report probably will  
27 not be prepared by the 17<sup>th</sup>. The State, however, will promptly disclose materials upon  
28 receipt.

1 Submitted this 14th day of November, 2008.

2  
3 CRISS E. CANDELARIA  
APACHE COUNTY ATTORNEY

4  
5 BY \_\_\_\_\_

6 Bradley W. Carlyon  
Chief Deputy County Attorney

7  
8 The original filed with the  
9 Clerk of the Superior  
10 Court and a copy delivered  
this 14th day of November  
2008 to:

11 The Honorable Michael Roca  
12 Apache County Superior Court  
Judge *Pro Tem*

13 Benjamin M. Brewer, Esq.  
14 The Wood Law Office  
Post Office Box 969  
15 Show Low, Arizona 95901-0969  
Fax # (928) 537-8864

16  
17 BY B. Hennessy