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SUPERIOR COURT  
YAVAPAI COUNTY ARIZONA  
4  
2020 JAN 15 PM 4:27  
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Attorneys for STATE OF ARIZONA

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**IN AND FOR THE COUNTY OF YAVAPAI**

**STATE OF ARIZONA,**

Plaintiff,

vs.

**ANTHONY JAMES RICHARDS,**

Defendant.

CAUSE NO. P1300CR201600476

**STATE'S RESPONSE TO  
DEFENDANT'S MOTION IN  
LIMINE TO SANITIZE PRIOR  
CONVICTIONS**

Assigned to Hon. Tina R. Ainley

1           The State of Arizona, by and through Sheila Polk, Yavapai County Attorney, and  
2 her deputy undersigned, hereby submits its Response to Defendant's Motion in Limine to  
3 sanitize Defendant's prior convictions.

4           The State will not seek to introduce evidence of Defendant's prior Oregon  
5 convictions in its case-in chief.

6           In the event, that Defendant seeks to introduce evidence of "good character" during  
7 the mitigation/aggravation or penalty phase of the trial, the State may introduce evidence  
8 regarding these issues for rebuttal. *See State v Shephard*, 27 Ariz. App. 488, 450, 555 P.2d  
9 1136, 1138 (1976). Additionally, the State reserves the right to impeach the Defendant  
10 with his prior convictions, under Rule 609, Ariz. R. Evid, should he choose to testify.

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1 //s

RESPECTFULLY SUBMITTED this 15 day of January, 2020.

Sheila Polk  
Yavapai County Attorney

By: Steven A. Young for  
Joshua I. Fisher  
Deputy County Attorney

COPY of the foregoing

mailed  emailed  hand-delivered

this 15 day of January, 2020 to:

Hon. Tina R. Ainley  
Yavapai County Superior Court Division 3

Craig Williams  
Attorney for Defendant

By: [Signature]