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Attorney for Defendant

**IN THE SUPERIOR COURT OF YAVAPAI COUNTY
IN AND FOR THE STATE OF ARIZONA**

STATE OF ARIZONA.,

Plaintiff,

vs.

DAWN MARIE CASTANEDA,

Defendant.

Case No.: P1300CR201100879
INITIAL DISCLOSURE REQUEST
Division 3

Defendant hereby formally requests disclosure by the State of the following:

1. Pursuant to Rule 15.1(b)(1), the names and addresses of all persons whom the prosecutor intends to call as witnesses in the State's case-in chief together with their relevant written or recorded statements. Defendant additionally requests disclosure of the names and addresses of all persons identified as witnesses in this case but whom the prosecutor does not intend to call at trial, as well as their written or recorded statements.
2. Pursuant to Rule 15.1(h), the names and addresses of all persons whom the prosecutor intends to call as rebuttal witnesses together with their written or recorded statements.
3. Pursuant to Rule 15.1(e)(1) and 15.1(b)(5), copies of all papers, documents, photographs or tangible objects including but not limited to reports; **all tapes or digital recordings (audio/video) of the booking area; 911 calls; names of potential witnesses** that the prosecutor intends to use at trial or which were obtained from or purportedly belong to Defendant, or which were obtained in connection with this case that the prosecutor does not intend to use at trial.

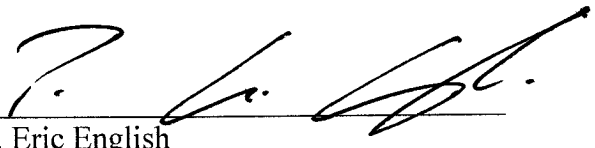
- 1 4. Pursuant to Rule 15.1(d), a list of the prior felony convictions and/or dishonesty
2 or moral turpitude convictions that the prosecutor intends to use to impeach a
disclosed defense witness of Defendant at trial.
- 3 5. Pursuant to Rule 15.1(e)(3), any completed written reports, statements and
4 examination notes made by experts listed as witnesses under subsections (b)(1) or
5 (b)(4) of Rule 15.1. This includes, but is not limited to, those persons whom the
6 prosecutor intends to call as witnesses in the case-in-chief, persons the prosecutor
7 does not intend to call as witnesses, and experts who have personally examined
8 any defendant or any evidence in this particular case, whether or not the
9 prosecutor intends to call the expert at trial.
- 10 6. Pursuant to Rule 15.1(d), a list of the prior felony convictions and/or dishonesty
11 or moral turpitude convictions of all witnesses, whether or not the prosecutor
12 intends to call the witness at trial.
- 13 7. Pursuant to Rule 15.1(b)(9), copies of all electronic surveillance of any
14 conversations to which Defendant was a party, or of Defendant's business or
15 residence.
- 16 8. Pursuant to Rule 15.1(b)(10), copies of any search warrants executed in
17 connection with this case, as well as any search warrant affidavits and returns.
- 18 9. Pursuant to Rule 15.1(e)(2), copies of any 911 calls, dispatch tapes, dispatch logs,
19 radio tapes, radio logs and any other record containing information relating to law
20 enforcement communication or other activity related to this case.

21 Pursuant to Rule 15.1(f), this request for disclosure extends to material and information
22 in the possession or control of: (1) the prosecutor or members of the prosecutor's staff; (2) any
23 law enforcement agency which has participated in the investigation of this case and that is under
24 the prosecutor's direction or control; (3) and/or any other person who has participated in the
25 investigation or evaluation of this case and who is under the prosecutor's direction or control.

26 **CONTINUING REQUEST FOR ADDITIONAL STATE DISCLOSURE**

Pursuant to Rule 15.6, this request for disclosure is a continuing request to include not
only items in the prosecutor's possession or control at the time this request is made, but also to
include items in this request. This continuing request includes, but is not limited to, any original
or supplemental reports prepared by a law enforcement agency, as well as any other item listed
in subsection (b) of Rule 15.1 not previously disclosed.

RESPECTFULLY SUBMITTED this ____ day of September, 2011.



P. Eric English
Attorney for Defendant

Original of the foregoing filed on this 22 day of September, 2011 with:

Clerk of the Superior Court
120 S. Cortez Street
Prescott, Arizona 85301

Copy of the foregoing emailed/mailed on this 22 day of September, 2011 to:

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Special Deputy Yavapai County Attorney
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By: 