

SUPERIOR COURT
YAVAPAI COUNTY, ARIZONA

2020 FEB 20 AM 10:55 ✓

DONNA McQUALITY, CLERK

P. RUGGLES

BY: _____

YAVAPAI COUNTY ATTORNEY'S OFFICE
Firm No. 00048700
Joshua I. Fisher, SBN 024890
Deputy County Attorney
255 East Gurley Street
Prescott, AZ 86301
(928) 771-3344
ycao@yavapai.us

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 NOTICE OF INTENT
TO USE STATEMENT'S OF AN
UNAVAILABLE WITNESS: DEAN
KNIGHT**

Assigned to Hon. Tina R. Ainley

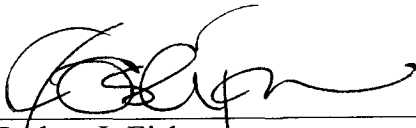
1 The State of Arizona, by and through Sheila Polk, Yavapai County Attorney, and
2 her deputy undersigned, hereby do not oppose Defendant's Notice of Intent to Use
3 Statements of an Unavailable Witness as a whole, but reserve the right to make legal
4 objections outside of hearsay to the specific statements in part as appropriate. Further,
5 and for the same legal justifications stated in Defendant's Motion, the State provides
6 notice of its intent to use Statements of Unavailable Witnesses (Glen Croshaw and Vern
7 Lequieu). Both witnesses are now deceased but provided statements to law enforcement
8 that will be used to impeach statements of the defendant. The State recognizes that any
9 such statements noticed in this pleading are still subject to objection on grounds other
10 than hearsay during trial.

11

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RESPECTFULLY SUBMITTED this 19th day of February, 2020.

Sheila Polk
Yavapai County Attorney

By: 
Joshua I. Fisher
Deputy County Attorney

COPY of the foregoing

mailed emailed hand-delivered

this 20 day of February, 2020 to:

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

Craig Williams
Attorney for Defendant

By: 