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7 Attorneys for Plaintiff

8  
9 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
**IN AND FOR THE COUNTY OF YAVAPAI**

10  
11 STATE OF ARIZONA,  
12 Plaintiff,

13 v.

14 MICHAEL LEE HAM,  
15 Defendant.

Case No. P1300CR201901558

**STATE'S THIRD SUPPLEMENTAL  
NOTICE OF DISCLOSURE**

(Assigned to Div. 2)

16  
17 The State of Arizona hereby gives notice of supplemental disclosure pursuant to  
18 Rule 15.1, Arizona Rules of Criminal Procedure.

19 **Rule 15.1(b)(1) – Witnesses:**

20 The State may call in its case-in-chief or in rebuttal any witnesses from the  
21 defendant's disclosure or any co-defendant's disclosure, any witness from the State's  
22 initial disclosure notice and first supplemental disclosure notice, and any person named in  
23 the investigative reports, including the following:  
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1. Kathy Piccolotti
  2. Anthony R. Reeves

- 1 3. Janet Reeves
- 2 4. Special Agent Mari Nash, US Department of Defense Inspector General's Office
- 3 5. Joseph Edward Vincent
- 4 6. Joseph Brown
- 5 7. Margaret Pozdol
- 6 8. Elizabeth Hoffman
- 7 9. William Hoffman
- 8 10. Linda Lanning
- 9 11. Mark DePirro
- 10 12. Robert Cady
- 11 13. Diane Rennell
- 12 14. David Leininger
- 13 15. Ryan Norton
- 14 16. Diane Riley

14 **Previous Disclosure:**

15 The State has previously provided disclosure to Defense Counsel as follows:

16 With Initial Disclosures:

17 Investigative reports prepared by various Special Agents with the Arizona  
18 Attorney General's office and Special Agents / investigators with HHS-OIG,  
19 together with related documentation, photographs, and audio files, Bates  
20 numbered AG000001-AG002330, delivered to counsel for defendant at  
21 arraignment on January 9, 2020.  
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23 With First Supplemental Disclosures:

24 Investigative reports prepared by Special Agents with the Arizona Attorney  
25 General's office and related attachments, Bates numbered AG002331-AG002840,  
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1 disclosed via the State's FileShare server on February 7, 2020.

2 With Second Supplemental Disclosures:

3 Investigative reports prepared by Special Agents with the Arizona Attorney  
4 General's office and related attachments, Bates numbered AG002841-AG002954,  
5 disclosed via the State's FileShare server on March 20, 2020.  
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7 With Third Supplemental Disclosures:

8 Documents Bates numbered AG002955-AG002986, disclosed June 1,  
9 2020, via the State's FileShare server.  
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11 With Fourth Supplemental Disclosures:

12 Financial records from Zions First National Bank, NA, and its affiliates,  
13 Bates numbered AG003075-AG045454, disclosed August 3, 2020, via the State's  
14 FileShare server.  
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16 Additional Documents:

17 Insurance documents Bates numbered AG045997-AG046036, disclosed  
18 August 11, 2020, via the State's FileShare server.  
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20 With Fifth Supplemental Disclosures: Arizona Attorney General supplemental  
21 reports and related attachments, Bates numbered AG045455-AG045965, and additional  
22 documents, including CV of the state's expert witness, Bates numbered AG046037-  
23 AG046040, and AG046253-AG046290, disclosed via the State's FileShare server on  
24 February 1, 2021.  
25  
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1           With Sixth Supplemental Disclosures:

2           Medical insurance information, Bates numbered AG046053-AG046252,  
3 disclosed September 1, 2020, via the State's FileShare server.

4           With Seventh Supplemental Disclosures:

5           Investigative reports prepared by Special Agents with the Arizona Attorney  
6 General's Office and related attachments, online insurance information, and  
7 Southwest Eye Center patient surgery files, Bates numbered AG046406-  
8 AG047786, disclosed February 16, 2021, via the State's FileShare server.

9           Plea Agreements: Pleadings, free talk audio files, and documentation  
10 provided by defendants and/or counsel at free talk interviews (where applicable),  
11 of thirty four (34) co-defendants who have previously entered pleas, Bates  
12 numbered AG002987-AG003074, AG045966-AG045996, AG046041-AG046052,  
13 AG046291-AG046405, AG047787-AG047812, AG047787-AG047812, and  
14 AG047836-AG047902, disclosed after such pleas were entered, via the State's  
15 FileShare server.

16           With Eighth Supplemental Disclosures:

17           Investigative reports prepared by Special Agents with the Arizona Attorney  
18 General's Office and related Attachments, Bates numbered AG047813-  
19 AG047835, disclosed April 22, 2021, via the state's FileShare server.

20           With Ninth Supplemental Disclosures:

21           Investigative Report prepared by Special Agent McClain with the Arizona  
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1 Attorney General's Office, and related Attachments, Bates numbered AG047903-  
2 AG047919, disclosed December 7, 2021, via the state's FileShare server.

3 Medical Records:

4 Copies of patient surgery charts seized from Kokopelli Eye Institute  
5 pursuant to P1300SW201800126, Bates numbered AG047920-AG065210,  
6 disclosed December 17, 2021, via the state's FileShare server.

8 Copies of TriWest Healthcare Alliance files, Bates numbered AG065211-  
9 AG074242, disclosed December 17, 2021, via the state's FileShare server.

10 Statements of Co-Defendants:

11 Audio recordings of free talk interviews of various co-defendants, Bates  
12 numbered AG074243-AG074260, disclosed December 17, 2021, via the state's  
13 FileShare server.

14 With Tenth Supplemental Disclosures:

15 Investigative report prepared by Special Agent McClain with the Arizona  
16 Attorney General's Office, and related Attachment, Bates numbered AG074261-  
17 AG074265, disclosed December 20, 2021, via the state's FileShare server.

18 RESPECTFULLY SUBMITTED this 22<sup>nd</sup> day of December, 2021.

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22 MARK BRNOVICH  
23 ATTORNEY GENERAL

24 /s/ Brett Harames  
25 BRETT HARAMES  
26 Assistant Attorney General  
Criminal Division

1 ORIGINAL of the foregoing efiled  
this 22<sup>nd</sup> day of December, 2021, with:

2 Clerk of the Court  
3 Yavapai County Superior Court

4 COPY of the foregoing emailed  
5 this 22<sup>nd</sup> day of December, 2021, to:

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10 *Attorneys for Defendant MICHAEL LEE HAM*

11 By: /s/ P. Cox

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