Clerk of the Superior Court \*\*\* Electronically Filed \*\*\* I. Osuna, Deputy 6/25/2025 10:40:55 AM Filing ID 20086939

RACHEL H. MITCHELL MARICOPA COUNTY ATTORNEY

Edward Leiter Deputy County Attorney Bar ID #: 025593 225 W Madison St, 6th Floor Phoenix, AZ 85003 Telephone: (602) 372-7016 sp2div@mcao.maricopa.gov MCAO Firm #: 00032000 Attorney for Plaintiff

# IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF MARICOPA

THE STATE OF ARIZONA,	CR2025-006831-001
Plaintiff,	STATE'S NOTICE OF DISCLOSURE AND REQUEST FOR DISCLOSURE
vs.	
LAURA MICHELLE OWENS,	(Assigned to the Honorable Monica S Garfinkel, Div. CMC06)
Defendant.	

The State of Arizona, by and through undersigned counsel, hereby gives notice of disclosure pursuant to Rule 15.1, Arizona Rules of Criminal Procedure, and requests disclosure pursuant to Rule 15.2. If this case involves a victim, the State has made every attempt to comply with A.R.S. § 13-4434 and Rule 39 of the Rules of Criminal Procedure by redacting the victim's "identifying and locating information." If, for any reason, victim identifying or locating information has inadvertently been disclosed the State requests that defense counsel immediately notify the State so that it may substitute the disclosure

with a copy that conforms to the requirements of A.R.S. § 13-4434 and Rule 39. The State further requests that any copies of documents containing victim identifying or locating information not be further disseminated to anyone, including the Defendant.

#### Rule 15.1(b) Witnesses

The State may call the following witnesses in the case in chief or as rebuttal witnesses:

Witness

Julie Alrich

Witness

Deandra Arena

Witness

Police

Jan Black Owens

Police Michael Blasko Officer/Aide/Deputy

Officer/Aide/Deputy

Badge: 1396

**Detective Terje Boe** 

Badge: 808

Department 8401 E. Indian School Road Scottsdale AZ 85251

Maricopa County Attorney's Office 225 W. Madison St Phoenix AZ 85003

Scottsdale Police

**Brandon Buckner** Scottsdale Police Police Officer/Aide/Deputy Badge: 1422 Department 9065 E. Via Linda Scottsdale AZ 85258

Witness

Joe Cotchett

Burlingame, CA 94010

Police Officer/Aide/Deputy	Logan Craun Badge: 1527	Scottsdale Police Department 8401 E. Indian School Road Scottsdale AZ 85251
Witness	Lisa Daniels	
Witness	Samantha Deans	
Victim	Clayton Ray Echard	
Witness	Doribel Estrella	
Witness	Jeanie Fabre	
Witness	John Fantauzzi	
Police Officer/Aide/Deputy	Detective Baron Fulp Badge: 1429	Scottsdale Police Department 8401 East Indian School Road Scottsdale AZ 85251
Wit-Vic Protected Address	Greg Gillespie	Phoenix, AZ 85028
Witness	David Gingrich	BLD 640 Warner Hall Wafb Chandler, AZ
Police Officer/Aide/Deputy	Andrew Gomez Badge: 1586	Scottsdale Police Department 8401 E. Indian School Road Scottsdale AZ 85251

Police Officer/Aide/Deputy	Gabriel Gonzalez Badge: 820	Maricopa County Attorney's Office 225 W. Madison St Phoenix AZ 85003
Police Officer/Aide/Deputy	Detective Thomas Goodson Badge: 1203	Scottsdale Police Department 9065 E. Via Linda Scottsdale AZ 85258
Witness	Dustin Griswald	
Witness	Heather Hall	
Witness	Doug Haws	
Witness	Jeffrey Higley	
Witness	Rosanne Huebener	
Witness	Jones MD	TBD
Police Officer/Aide/Deputy	Heather Krimm Badge: 824	Maricopa County Attorney's Office 301 W. Jefferson, 8th Floor Phoenix AZ 85003
Police Officer/Aide/Deputy	Officer Andrew Lackowski Badge: 1537	Scottsdale Police Department 8401 E. Indian School Road Scottsdale AZ 85251
Witness	Tamara Lister	

Witness	Makhoul	
Witness	Michael Marraccini	
Witness	Roberta Martinez	
Witness	Hunter Mauer	
Witness	Michael Tom Medchill MD	Cape Coral, FL 33914
Witness	Stormy Lynn Mitchell	Conroe, TX 77301
Witness	Angela Moffat	
Witness	Carmen Mora	Phoenix, AZ 85021
Witness	Matt Mulvey	
Witness	Sarah Navarro	Long Island City,
Witness	Dave Neal	
Witness	Ronn Owens	
Police	Detective Maxwell	Scottsdale Police

Officer/Aide/Deputy	Patton Badge: 1403	Department 9065 E. Via Linda Scottsdale AZ 85258
Police Officer/Aide/Deputy	Daniel S Peckham Badge: 752	Maricopa County Attorney's Office 225 W. Madison St Phoenix AZ 85003
Witness	Bonnie Platter	40 N Central Ave., Suite 2310 Phoenix, AZ
Police Officer/Aide/Deputy	Detective Joe Plummer Badge: 263	Maricopa County Attorney's Office 225 W. Madison St Phoenix AZ 85003
Witness	Ana Reyes	
Witness	Shawn Roanhorse	
Witness	Nicholas San Filippo	Encinitas, CA 92024
Witness	Jeannine Sander	
Police Officer/Aide/Deputy	Christopher Scott Badge: 868	Maricopa County Attorney's Office 225 W. Madison St Phoenix AZ 85003
Police Officer/Aide/Deputy	Michael Seemiller Badge: 1187	Scottsdale Police Department 9065 E. Via Linda Scottsdale AZ 85258

Police Officer/Aide/Deputy	Anthony Silva Badge: 1545	Scottsdale Police Department 8401 E. Indian School Road Scottsdale AZ 85251
Witness	Madeline Sobek	
Police Officer/Aide/Deputy	Kyle Swan Badge: 1440	Scottsdale Police Department 9065 E Via Linda Scottsdale AZ 85258
Witness	Cathy Swann	
Police Officer/Aide/Deputy	Ryan Sylvester Badge: 1635	Scottsdale Police Department 8401 E. Indian School Road Scottsdale AZ 85251
Custodian Of Records	Mary Valenzuela-Resto MBA, RHIA	Banner Health - Release of Information Center
Witness	Jessica Valenzula	
Police Officer/Aide/Deputy	Detective James Weege Badge: 811	Maricopa County Attorney's Office 301 W. Jefferson, 8th Floor Phoenix AZ 85003
Witness	Andrew Williams	Hoboken, NJ
Custodian Of Records	Amber Wood	

Witness

Gregg Woodnick

2600 N Central Ave 1760 Phoenix, AZ 85004-1455

Witness

Zieman

### **Other Witnesses**

- Any custodian of records for any disclosed item or document Maricopa County Sheriff's Office, MVD, Banner Hospital, Barrow Dignity Health, Honor Health, MedSpa, MomDoc, Planned Parenthood LA, 1060 OBGYN, Family Planning Associates, Innova Med Spa, Scottsdale Perinatal Associates, SMIL, Sonora Quest Labs, Suddenly Slimmer Med Spa, Vida Bella Med Spa, Women's Care Phoenix, and Social Media.
- 2. Any witness from the defense disclosure.
- 3. Any individual named or referred to in the preliminary hearing transcript, grand jury transcript, police report, or other State's disclosure.
- 4. Cell Phone Examiner/Analyst, Cell Phone/Cell Site Expert, and Computer Forensics Expert
- 5. Fingerprint Technician, Forensic Document Examiner/Questionable Documents, Latent Print Examiner, and Handwriting Expert.

# Rule 15.1(b) Evidence

The State may introduce into evidence:

# **Crime/Crime Scene Evidence**

- 1. Pictures, reproductions, PowerPoint presentations, charts or diagrams of the crime, crime scene, or any damage or injuries that were a result of the crime.
- 2. All physical evidence taken from the defendant.
- 3. Any fingerprints, footprints, hairs, fibers, blood, bodily fluids, chemicals or

other forensic evidence found as a result of the investigation of the crime and their analyses.

4. All physical evidence taken as a result of medical exams and the analysis of that evidence.

### Identification Evidence

- 1. Any arrest/booking report or photograph of the defendant related to the charged offenses.
- 2. MVD records, prior conviction records or other records demonstrating a prior identification of the defendant.
- 3. Any photographic line-ups.

# Victim Evidence

- 1. Photographs of the victim.
- 2. All medical records of the victims, if relevant to the crime charged.
- 3. All statements made by witnesses for purposes of medical diagnosis or treatment, if relevant or applicable.

# **Document Evidence**

- 1. Any written instruments including but not limited to: checks, receipts, applications for credit, accounts, or check-cashing services.
- 2. Any computer or account access devices, including but not limited to: credit cards, debit cards, passwords, account numbers, password generators.
- 3. Any forgery devices, including but not limited to: computer software, check blanks, driver's license blanks, social security card blanks, laminator.
- 4. Samples of handwriting and related analyses.

- 5. Bank account records, credit account records, or other receipts or transaction records, including but not limited to: Transaction records, emails.
- 6. MVD records including but not limited to driver's license(s), ID card(s).
- 7. Vehicle Registration and/or application(s) for same.

# **Other Evidence**

- 1. Any statements of the defendant or of any co-conspirators mentioned or contained in the police reports or other disclosed materials.
- 2. Any writing or recording of the defendant or witnesses.
- 3. Any object, representation of an object, thing, or document referred to in the defense disclosure or disclosed by the defense or used or referred to at trial by the defense.
- 4. Any grand jury, preliminary hearing, or deposition transcript.
- 5. Any object, representation of an object, thing, or document referred to in the preliminary hearing transcript, grand jury transcript, police report, or in any of the State's disclosure, including but not limited to:
  - Any evidence arising out of DR(s):
    DR 2024031 Maricopa County Attorney's Office and any supplements.
- 6. Any video and/or audio recording obtained from on-officer camera.
- 7. Any surveillance video.
- 8. The State gives notice that it may introduce FTR recordings of testimony in this case in evidence or use them during closing arguments.

#### Rule 15.1(b) Notices

Any other witnesses or evidence will be disclosed seasonably according to Rule
 15.6.

2. The State has no obligation to provide witness telephone numbers. The only witness telephone numbers to be disclosed are those that are already included in police reports or other disclosure materials.

3. All of the listed witnesses' existing relevant written statements have already been provided in the police reports, are provided with this notice or will be provided seasonably. Any other statement of a witness that any witness may remember may be obtained through witness interviews.

4. All existing written statements of the Defendant have already been provided in the police reports, are provided with this notice or will be provided seasonably. Any other statement of the defendant that any witness may remember may be obtained through witness interviews.

5. Audio, video, or digitally recorded statements or images are available for review, and copies of such recorded statements or images, if not already provided, will be provided upon request after sufficient arrangements are made, including providing blank tapes or compact disks and paying any reasonable costs associated with making copies.

6. Any exhibit presented to the grand jury has already been disclosed to the defense except insofar as disclosure may be prohibited by A.R.S. § 13-2812 or any other statute

or rule. The State cannot identify for disclosure exhibits that were not admitted or presented to the grand jury.

7. Defense counsel shall be responsible for recording any witness statement made at an interview of the witness.

8. Experts to be called as witnesses in this case are listed in the witness list. The names and addresses of experts along with completed results of physical examinations, scientific tests, experiments, or comparisons have already been provided, are provided with this notice, or will be provided upon completion.

9. Any police officer listed above may be called as an expert witness with respect to an area within the officer's training and experience, including expert knowledge of illegal drugs, their possession or sale, useable amounts, or any other topic.

10. Any criminalist, fingerprint analyst, identification technician, or other similar witness will be called as an expert in his/her respective field.

- a. All Forensic Scientists' Analyst Permits, Affidavits, and Curricula Vitae for Phoenix Police Department Laboratory Services Bureau are located at <u>https://www.lawphx.net/disclosurecenter/phxpros.html</u>.
- b. All Forensic Scientists' Analyst Permits, Affidavits, and Curricula Vitae for Scottsdale Police Department Laboratory Services Bureau are located at <u>https://www.scottsdaleaz.gov/attorney/lab-disclosure</u>

11. Unless otherwise indicated, the State wishes to be present during the interviews of all potential State's witnesses. The State's witnesses will be made available for defense interviews, except those who testified at a preliminary hearing or juvenile transfer hearing.

12. There was no electronic surveillance. There was a search warrant. There was no informant whose existence the defendant is entitled to know under Rule 15.4(b)(2).

13. All existing original and supplemental reports prepared by a law enforcement agency in connection with this case have already been provided or are provided with this notice or will be provided seasonably.

14. The State is unaware of any existing material or information, unknown to the defense, that would tend to mitigate the defendant's guilt or punishment. Pursuant to *Kyles v. Whitley*, 514 U.S. 419, 437-438, 115 S. ct. 1555, 1567-1568 (1995), the State will review any evidence in its possession, determine if any of it is exculpatory, and, if so, turn such evidence over to the defense.

#### Rule 15.1(d) Prior Felony Convictions

1. The State intends to use at trial any prior felony convictions of the defendant or defense witness for impeachment purposes pursuant to Rule 609, Arizona Rules of Evidence. Furthermore, the State intends to use defendant's prior felony convictions as aggravating circumstances pursuant to A.R.S. § 13-701 and for sentence enhancement under §13-703 and §13-704.

2. If applicable, the State has provided or will be providing a list of the defendant's prior felony convictions in a separate allegation.

3. The State will provide a list of prior felony convictions of witnesses the state intends to impeach or call at trial thirty days before trial or thirty days after a request. The State cannot provide a list of felony convictions for defense witnesses without an accurate name, date of birth, and social security number for each defense witness.

4. The following witnesses may be called, and the following exhibits may be used to prove any prior conviction(s):

a. A fingerprint technician/analyst.

b. The fingerprints of the defendant.

c. The original court files on the priors.

d. The custodian of the original court files.

e. The defendant's defense attorney on the prior(s).

f. The arresting officers on the prior offenses.

g. Any present/past Adult Probation Officers or Parole Officers of the Defendant.

h. Any probation/parole files on the prior(s).

i. Any booking photographs on the prior(s).

j. Any prior fingerprints taken of the defendant.

k. Any certified copies.

- I. Any "pen packs" from a State/Federal Prison/Penitentiary.
- m. Department of Corrections records custodian.
- n. MCSO Detention Officers.
- o. MCSO Custodian of Records.
- p. MCSO Booking Records/ Booking Photo(s).

#### **Other Evidence Upon Request**

- 1. The State will make recordings of existing 911 calls available to defense after a written request by providing an authorization form to be presented to the appropriate custodian of record.
- 2. Examination notes made by experts listed in Rule 15.1(b)(1) and 15.1(b)(4) shall be provided within thirty days of a written request.
- 3. All requests to examine or scientifically test items of evidence must be in writing.

#### **Evidence of Other Acts**

Pursuant to Rule 404(b), Arizona Rules of Evidence, the State intends to use evidence of other crimes, wrongs, or acts to prove motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident, or for any other relevant purpose and for impeachment purposes that is not otherwise contained in the police reports. It is the State's position that any acts mentioned in the police reports are intrinsic to the charged crimes and evidence of such are admissible separate and apart from the provisions of Rule 404(b). If matters contained in the police reports are deemed evidence of other crimes, wrongs, or acts the State gives notice that it may use such evidence pursuant to Rule 404(b). The State will provide notice of specific acts not contained in the police reports and the witnesses it intends to call at trial in a separate notice.

#### State's Request for Disclosure

- The State requests a list of all papers, documents, photographs, and other tangible objects that the defendant intends to use at trial.
- The State requests any completed written reports, statements and examination notes made by experts the defense intends to call at trial.
- 3. The State requests copies of any recorded statements made during interviews conducted without the presence of a Deputy County Attorney.
- 4. The State requests, pursuant to Rule 15.2(a)(3), (4) and (6), that defendant submit to being fingerprinted, palm-printed, foot-printed, photographed or permit the taking of samples of his/her hair, blood or saliva at any scheduled court hearing. Submitted June <u>25</u>, 2025.

RACHEL H. MITCHELL MARICOPA COUNTY ATTORNEY

BY: /s/

Edward Leiter Deputy County Attorney

Copy e-mailed/e-filed June 25, 2025, to:

The Honorable Monica S Garfinkel Judge of the Superior Court

Sandra Schutz 1650 N 1st Ave Phoenix, AZ 85003 Sandra@kolsrudlawoffices.com Attorney for Defendant

Sei BY: /s/2

Edward Leiter Deputy County Attorney

sk