

PSG

1 Matthew J. Smith  
Mohave County Attorney  
2 Gregory A. McPhillips  
Deputy County Attorney  
3 State Bar No. 016262  
315 N. 4th Street  
4 P O Box 7000  
Kingman, AZ 86402  
5 Telephone: (928) 753-0719  
Fax No.: (928) 753-2669  
6 CAO.Court@co.mohave.az.us  
Attorney for Plaintiff

FILED  
BY: *db*

2015 MAR 11 PM 4:21

VERLYNN TINNELL  
SUPERIOR COURT CLERK

7 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
8 **IN AND FOR THE COUNTY OF MOHAVE**

9 STATE OF ARIZONA,  
10 Plaintiff,

No. CR-2014-1193

11 vs.

**RESPONSE TO DEFENDANT'S  
NOTICE TO INTERVIEW ALL  
WITNESSES NOTICED AS STATE  
TRIAL WITNESSES**

12 **JUSTIN JAMES RECTOR,**  
13 Defendant.

14 COMES NOW, the State of Arizona, by the Mohave County Attorney and through  
15 the undersigned deputy, Gregory A. McPhillips, respectfully responds to defendant's  
16 notice of intent to interview all witnesses noticed as state trial witnesses.

17 The State has previously requested interviews start but has not received a  
18 response from defense.<sup>1</sup>

19 The State would not that if the State decides not to call a witness and the State  
20 perceives no relevance to the testimony (usually due to redundancy) the State retains the  
21 authority to decide to withdraw from the interview of that witness. Said another way,  
22 experience dictates that we will not interview every cited witness.

23 Defendant's notice does not request the Court order anything. As such, the Court  
24 will take no action on this notice.  
25

<sup>1</sup> The State's requests are attached to this e-mail.  
Rector/CR-2014-1193



S8015CR201401193

1 RESPECTFULLY SUBMITTED THIS 11TH DAY OF MARCH, 2015.

2 MOHAVE COUNTY ATTORNEY  
3 MATTHEW J. SMITH

4 

5 By \_\_\_\_\_  
6 DEPUTY COUNTY ATTORNEY  
7 GREGORY A. MCPHILLIPS

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## Greg McPhillips

---

**From:** Greg McPhillips  
**Sent:** Tuesday, February 17, 2015 2:21 PM  
**To:** Ron Gilleo; Harry Moore  
**Subject:** Rector Interviews (Brandon Grasse)

Given the amount of disclosure, Judge Jantzen set a brisk schedule for trial prep. I want to start the process of interviewing State's witnesses.

I believe that the interview process would be best served if you first interviewed BHCPD Brandon Grasse. He is the case officer and has the most "general knowledge" of the State's case. Starting with him will help focus the interview process when we proceed to witnesses who were involved in more specific areas of investigation. He may also be the longest witness interview—by far.

I want to set aside 4 hours. By "4 hours" I mean a block of time consuming an entire morning or afternoon. We may not use all that time; but I want to encourage the questioning process.

Please tell me when are you both available for several morning or afternoon blocks within the next month.

**Greg McPhillips**

---

**From:** Greg McPhillips  
**Sent:** Monday, March 02, 2015 4:51 PM  
**To:** Harry Moore  
**Cc:** Ron Gilleo  
**Subject:** Rector interviews

Hello Mr. Moore,

On the 17<sup>th</sup> day of February 2015, I requested some dates to schedule an interview of Detective Grasse. I have not heard back from you yet. Do you have dates where you are free to do that interview?

On that same day, I also requested a list of defense witnesses. Do you know who the defense witnesses are?

Judge Jantzen's minute order of the 10<sup>th</sup> day of December 2014 required us to meet and decide a date by which all witness interviews will be completed. The order contemplated that we would have that answer for Judge Jantzen by then 3-25-15 status hearing. Further, the minute order specifies that we need to meet before that hearing and complete a joint status report. The information on the witness interviews should be in the joint status report. At the very least, I would like to start witness interviews and have a broad plan of attack for the remaining interviews prior to the 3-25-15 status hearing. Maybe we should all meet, with our calendars in hand, and discuss the scheduling of interviews.

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~  
~~\_\_\_\_\_ if you will \_\_\_\_\_?~~

1 A copy of the foregoing  
sent this same day to:

2 HONORABLE LEE F. JANTZEN  
3 SUPERIOR COURT JUDGE

4 RONALD S. GILLES  
LEGAL DEFENDER  
5 Mohave County Legal Defender's Office  
P O Box 7000  
6 Kingman AZ 86402

7 By Gij

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25