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May 8, 2009

William Katz, Esq.
Yuma County Attorney's Office
250 W 2nd St. Suite G,
Yuma Arizona 85364

Re: State v. Steven Anderson
J1403MS200900009

Dear Mr. Katz:

I am hereby requesting Rule 15 interviews with the following witnesses:

1. DPS Officer M.R. Jones #2819,
2. DPS Officer J. Mitchell #3473,
3. Border Patrol Agent G. Spoonamore #K30,
4. Border Patrol Agent Scott;
5. Border Patrol Agent Schultz
6. Border Patrol Agent Diaz
7. Border Patrol Agent Gomez; and,
8. Border Patrol Agent Griffiths

I am also requesting disclosure of the following items:

1. Any and all disclosure regarding the drug detection canine team Jerry-C and Border Patrol Agent Spoonamore;
2. Any and all records, reports, memoranda, notes, field logs, documents or recordings of any kind which relate to investigations in which Jerry-C was used in an effort to determine the presence or location of drugs;

3. Any and all records, reports, memoranda, notes, field logs or proficiency training records, including both documents and recordings of any kind, which relate to Jerry-C or his handler, Agent Spoonamore;
4. Any and all departmental or organizational policies, rules, directives, memoranda, or operating procedures relating to the training of drug detector dogs for the United States Border Patrol ("USBP"), including certification standards for the canine unit in this case and the standards of any and all canine organizations to which the USBP or Agent Spoonamore belong;
5. Any and all departmental or organizational policies, rules, directives, memoranda, or operating procedures relating to the field use of drug detector dogs by USBP;
6. Any and all departmental or organizational policies, rules, directives, memoranda, or operating procedures surrounding the last date of certification testing for this canine unit, including any recordings of the actual testing;
7. Any and all documentation listing all drugs Jerry-C is trained to detect, including synthetic drugs;
8. Any and all documentation defining the final response Jerry-C was trained to make upon finding drugs;
9. Any and all documentation identifying Jerry-C's primary reward;
10. Any and all documentation regarding the specific training aids used to train Jerry-C, specifically the chemical composition, purity, and packaging of the controlled substances;
11. Any and all laboratory analysis of seizures made by Jerry-C;
12. Any and all departmental or organizational policies, rules, directives, memoranda, or operating procedures which define or outline the minimum departmental standards of training proficiency for drug canines;
13. Any and all departmental or organizational policies, rules, directives, memoranda, or operating procedures which define or outline the response/find ratio that the canine search teams must maintain to remain in field services;
14. Computer record of the date and time of activation and the duration of activation of the Taser used during the incident. "Taser Cam" video of the usage; and

Thank you in advance for your anticipated cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'MJV', written in a cursive style.

Marc J. Victor