

**CLERK OF SUPERIOR COURT
VIRLYNN TINNELL, CLERK**



RECORDS REQUEST FORM

A. Person Requesting Court Documents		B. Party & Case Information	
Name	Raphael S. Moore	Case Number	S-8015-CR-20070789
Law Firm/Self	Moore & Moore Attorneys at Law	Petitioner /Plaintiff/ Bride	State DOB:
Address	413 F Street	Defendant/ Respondent/ Groom	Ronald James Paterson DOB: 09/26/62
City, State	Davis, CA	Date of Marriage (if requesting ML Abstract)	
Zip Code	95616		
Telephone	(530) 758-8317		

C. Type of Request		D. Fees	
A	Copies	Fee:	.50 cents per page
B	Certified Copies	Fee:	\$26.00 per document (plus costs for copies)
C	Marriage License Abstract	Fee:	\$26.00 each
D	Authentications	Fee:	\$78.00 per document (plus costs for copies)
E	Exemplifications	Fee:	\$52.00 per document (plus costs for copies)
F	CD- Hearing Request	Fee:	\$32.00 (plus Postage & Handling)
G	Fax	Fee:	\$26.00
H	Postage & Handling	Fee:	\$ 7.00

E. Request			
Type of Request	Description of Document	Quantity	Case Activity/Filing Date
A	Copy of all case documents	1	05/24/2007 - Present <i>98 pgs</i>

US Postal Service
Mail to/Payable to: Clerk of Superior Court Attn: Research Department 401 East Spring Street P. O. Box 7000 Kingman, Arizona 86402-7000 <i>* Please include Postage Paid Envelope</i>

Payment by Phone
Click Submit below to E-mail request or Fax form to: Clerk of Superior Court Attn: Research Department Fax: (928) 718-7615 Phone: (928) 753-0713 Visa or MasterCard Accepted

psb

FILED
BY MY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

2007-05-24 11:45:55

STATE OF ARIZONA,

Plaintiff,

vs.

RONALD JAMES PATERSON,
DOB: 09/26/1962

Defendant.

GRAND JURY MINUTES

NO.: CR-2007- 789

139-GJ-23

MOON

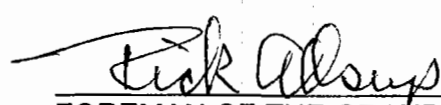
At a session of the Grand Jury of the County of Mohave held this 24th day of May, 2007, the above defendant being accused of the crime(s) of COUNTS 1 and 2: THEFT, CLASS 5 FELONY, committed in Mohave County, Arizona, on or about the 14th day of February and the 28th day of March, 2007, based upon the following witness:

NAME: DATE APPEARED
LHCPD May 24, 2007

having appeared before the Grand Jury and having given testimony under oath before the Grand Jury; which testimony was reported by the Reporter of the Grand Jury on the days that such testimony was given;

the Grand Jury with 16 members present, and only members of the Grand Jury present, deliberated upon the evidence and with 16 jurors voting, by a vote of 16 to 0, returned A TRUE BILL

COUNT 1: THEFT, CLASS 5 FELONY


FOREMAN OF THE GRAND JURY

SCANNED

the Grand Jury with 16 members present, and only members of the Grand Jury present, deliberated upon the evidence and with 16 jurors voting, by a vote of 16 to 0, returned ATRUE Bill.

COUNT 2: THEFT, CLASS 5 FELONY

Tick Allison
FOREMAN OF THE GRAND JURY

FILED
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2007 JULY 26 PM 4:55

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,

Plaintiff,

vs.

RONALD JAMES PATERSON,
DOB: 09/26/1962

Defendant.

DR#: LHCPD 2007-003721

FELONY INDICTMENT

NO.: CR-2007- 789

139-GJ-23

RECEIVED
SUPERIOR COURT

MOON

The Grand Jurors of Mohave County, Arizona, accuse **RONALD JAMES PATERSON**, charging that in Mohave County, Arizona:

COUNT 1: THEFT, CLASS 5 FELONY

On or about the 14th day of February, 2007, in the vicinity of 800 Park Hill Avenue, Bullhead City, Mohave County, Arizona, said Defendant, RONALD JAMES PATERSON, committed theft of currency belonging to Maurice Trudell, with a value of \$2,000.00 or more, all in violation of A.R.S. §§ 13-1802, 13-1801, 13-701 and 13-801, a Class 5 Felony.

MATTHEW J. SMITH
MOHAVE COUNTY ATTORNEY

" A TRUE BILL "
FOREMAN WRITES "A TRUE BILL"

Lero R Albright
BY LEROY R. ALBRIGHT
DEPUTY COUNTY ATTORNEY

Rick Allsup
FOREMAN OF THE GRAND JURY

SCANNED

COUNT 2: THEFT, CLASS 5 FELONY

On or about the 28th day of March, 2007, in the vicinity of 800 Park Hill Avenue, Bullhead City, Mohave County, Arizona, said Defendant, RONALD JAMES PATERSON, committed theft of currency belonging to Maurice Trudell, with a value of \$2,000.00 or more, all in violation of A.R.S. §§ 13-1802, 13-1801, 13-701 and 13-801, a Class 5 Felony.

MATTHEW J. SMITH
MOHAVE COUNTY ATTORNEY

"A TRUE BILL"
FOREMAN WRITES "A TRUE BILL"

Ray
BY LEROY R. ALBRIGHT
DEPUTY COUNTY ATTORNEY

Tick Allseep
FOREMAN OF THE GRAND JURY

WITNESS: LHCPD

PSG
FILED
MAY 24 2007
M

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

HONORABLE STEVEN F. CONN
DIVISION: 3
DATE: MAY 24, 2007
TIME: 3:58 P.M. - 4:31 P.M.

BY: VIRLYNN TINNELL, CLERK SUPERIOR COURT
~~VIRLYNN TINNELL, CLERK~~
CAROL BEEZER, DEPUTY CLERK
STEVE GARWOOD, COURT REPORTER

RETURN OF GRAND JURY INDICTMENT

STATE OF ARIZONA,
Plaintiff,

vs

CR-2007-0789

RONALD JAMES PATERSON
Defendant(s)

APPEARANCES: Kenneth N. Skousen, Deputy County Attorney.

The Court finds that there is 16 members of the Grand Jury present.

The Court finds that the Indictment contains 2 count(s), and each has been signed a True Bill by Rick Allsup, Grand Jury Foreman, and has also been signed by the Deputy County Attorney.

IT IS ORDERED directing the Clerk to file the Indictment and Minutes, along with any exhibits, and assign it the above cause number.

IT IS ORDERED that a Notice of Supervening Indictment shall issue.

IT IS ORDERED assigning this matter to Honorable Robert R. Moon, Division 5.

IT IS FURTHER ORDERED setting this matter for Arraignment on **Thursday, May 31, 2007 at 8:30 a.m.**, before the Commissioner Lee Jantzen, in the Court Commissioner's Courtroom, Third Floor. (Formerly the Visiting Judges Courtroom)

cc:

Mohave County Attorney

Mohave County Public Defender
Attorney for Defendant

SCANNED

ps6

TIME **FILED** M

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

MAY 24 2007

BY: **VIRLYNN TINNELL**
CLERK SUPERIOR COURT
DEPUTY

STATE OF ARIZONA,
Plaintiff,

CR-2007-0789

vs.

NOTICE OF SUPERVENING INDICTMENT
and
NOTICE OF ARRAIGNMENT

RONALD JAMES PATERSON
Defendant(s).

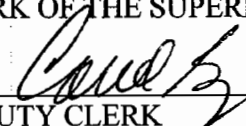
TO THE ABOVE NAMED DEFENDANT(S) AND COUNSEL:

In accordance with Rule 12.7, Arizona Rules of Criminal Procedure you are hereby notified that the above named Defendant(s) have been indicted for the offense(s) charged in the attached Indictment, and that the Defendant(s) is to appear **IN PERSON** for Arraignment in the Mohave County Superior Court, In the Court Commissioner's Courtroom, 3rd Floor, Mohave County Courthouse, 401 E. Spring Street, Kingman, Arizona on Thursday, **May 31, 2007 at the hour of 8:30 a.m.**

YOU ARE FURTHER NOTIFIED THAT IF ANY DEFENDANT FAILS TO APPEAR, HIS OR HER RELEASE MAY BE REVOKED AND BOND, IF ANY FORFEITED.

DATED this 24th day of May, 2007.

VIRLYNN TINNELL
CLERK OF THE SUPERIOR COURT

BY: 
DEPUTY CLERK

Copy of the foregoing mailed by first class, postage pre-paid to the following persons at the addresses shown, as provided by the County Attorney:

Mohave County Attorney

RONALD JAMES PATERSON
c/o Mohave County Jail
Defendant

Mohave County Public Defender
Attorney for Defendant

Mohave County Jail

Lake Havasu City Justice Court JFR-2007-00383

SCANNED

FILED
BY: ME

2007 MAY 25 PM 3:12

WILLIAM E. SNELL
SUPERIOR COURT CLERK

1 **TIMOTHY D. BENNETT**
2 Attorney at Law
3 5473 Peace River Ct.
4 Las Vegas, NV 89148
5 (702) 810-0373/ FAX (702) 953-7360
6 AZ Bar # 021426
7 Attorney for the Defendant

ORIG
ORIGINAL

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

7 **STATE OF ARIZONA**
8
9
10 **vs.**
11 **RONALD JAMES PATERSON,**
12
13 Defendant.
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No. CR 2007-0789

NOTICE OF APPEARANCE
AND
MOTION TO RECONSIDER
BAIL/RELEASE CONDITIONS
AND
MOTION FOR RELEASE OF SEIZED
PROPERTY
AND
REQUEST PERMITTING DEFENDANT
ACCESS TO COURT ATTIRE
(EMERGENCY HEARING
REQUESTED)

19 TIMOTHY D. BENNETT herewith submits and enters his notice of appearance for the
20 Defendant.

21 Additionally, by and through undersigned counsel, Defendant respectfully moves this
22 Honorable Court to reconsider the release conditions ordered in this matter, which includes an
23 order of cash bail in the amount of \$100,000. Further, Defendant moves this Honorable Court to
24 order the release of his cellular phone, seized by the police without probable cause. These
25 Motions are supported by the following Memorandum of Points and Authorities and various
26 letters from the community, incorporated by reference herein.

SCANNED

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1 RESPECTFULLY SUBMITTED THIS 25TH DAY OF MAY 2007.

2 

3
4 Timothy D. Bennett
Attorney for Defendant

5 MEMORANDUM OF POINTS AND AUTHORITIES

6 **BAIL**

7 In the above cause, Mr. Paterson is alleged to have committed two counts of theft, each
8 class 5 felonies. Mr. Paterson is also charged with three further counts of felony theft in cause
9 number CR-20070667 before this Honorable Court. All five theft counts in both the instant cause
10 and CR-20070667 arise from contracts or other business transactions between Mr. Paterson and
11 the alleged victims that have apparently fallen into some dispute. Indeed, at first blush it would
12 seem that all five counts have the appearance of purely *civil* matters. The cumulative value of the
13 amounts in controversy in the instant cause barely exceeds the amount otherwise jurisdictionally
14 appropriate to small claims. However, it is also clear that this matter has received much press
15 attention, and that many of the alleged victims are fairly financially prominent in the community.
16
17

18 In cause CR-20070667, Mr. Paterson's appearance was ordered secured by a \$60,000
19 security bond, which was posted on or about 14 May 2007. It is noteworthy that Mr. Paterson
20 was scheduled to appear in that matter for an arraignment at a later date, for which the Mohave
21 County Attorney's office had apparently arranged further press coverage. However, Mr. Paterson
22 eagerly walked into Division 5 on 14 May 2007 before this Honorable Court to appear on his
23 initial three theft charges. It was merely days later on Friday 18 May 2007 that Mr. Paterson was
24 arrested in the instant cause at an hour too late to secure counsel or otherwise prepare to fully
25 discuss release conditions at the hearing that occurred in this matter on Saturday 19 May 2007.
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1 Given the press coverage and the prominence of the alleged victims, it is at this point that the
2 apparent implications for justice in this matter would take a more sinister turn, one that seems to
3 attempt to extort civil relief from Mr. Paterson by abuse of criminal process.

4 On Saturday 19 May 2007, during a hearing conducted by video while he was held in
5 custody, Mr. Paterson's appearance at future proceedings in this matter were initially secured by
6 a security bond of \$100,000. Shortly after, as if by some second thought, Mr. Paterson was
7 notified that this appearance would be secured by *cash* bond only, in the same amount. No
8 explanation for this last moment change was given. While Mr. Paterson would have been able to
9 obtain a security bond over the weekend, he is unable to generate that amount in cash, whether
10 upon short notice at the weekend, or at any other time. As a result, as of this writing, Mr.
11 Paterson has been wrongfully deprived of his freedom for seven days, with no immediate
12 restoration to freedom in sight. During this unjust incarceration, effectively a punishment before
13 conviction, Mr. Paterson has suffered blood pressure of 174 over 112. This has prompted the
14 nurse at the Mohave County Jail to recommend Mr. Paterson's hospitalization; immediately prior
15 to his present incarceration, his blood pressure was approximated a health, normal 120 over 80.
16 *For these reasons, an expedited hearing is requested in this matter.*

17
18
19
20 The Eighth Amendment to the Constitution of the United States and the Constitution of
21 the State of Arizona (Art. 2 § 22) in identical language provide that:

22 *Excessive bail shall not be required, nor excessive fines imposed, nor cruel and*
23 *unusual punishments inflicted (emphasis added).*

24 While the "Bail Clause" of the Eighth Amendment is not seen as directly applicable to
25 state courts under the 14th Amendment doctrine of "incorporation," it is undisputed that civilized
26 jurisprudence, as magnified before the entire world by the laws of the United States, demands
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1 that where a criminal defendant's appearance is to be secured by bail, that bail shall not be
2 excessive (*see Carlson v. Landon*, 342 U.S. 524 (1952)). "Excessive," in this instance is defined
3 as "bail in a sum more than will be reasonably sufficient to prevent evasion of the law by flight"
4 (*see Black's Law Dictionary*, 6th Ed.).

5 The Arizona Supreme Court agrees with this analysis, addressing the considerations for
6 setting reasonable bail in *Gusick v. Boies*, 72 Ariz. 233 (1951). The Court notes that the
7 determination of the amount of bail must be done in light of the constitutional prohibition against
8 excessive bail (*id.*) and should also take into account:

- 10 1) The nature and gravity of the offense charged
- 11 2) The character and reputation of the accused
- 12 3) His previous criminal record, if any
- 13 4) The measure of punishment which may be inflicted
- 14 5) The ability of the accused to give bail

15 In the foregoing, the Arizona Supreme Court confirmed that in Arizona a defendant must
16 be presumed innocent in fixing the amount of bail. The sole purpose of bail is to ensure
17 defendant's attendance when required. Therefore, any bail fixed at more than necessary to secure
18 a defendant's appearance is held to be excessive, in violation of the Arizona Constitution. If the
19 bail set prevents the defendant from making bail or punishes the person charged with a crime
20 before conviction, it is deemed excessive.

21 Mr. Paterson has already posted bail by security bond in the amount of \$60,000 in
22 Mohave County. It is noteworthy that this \$60,000 bail ordered is for three felony charges in
23 cause number CR-20070667, while the \$100,000 ordered in the instant matter is for two class 5
24 felony charges. This \$100,000 is meant to secure Mr. Paterson's appearance in a matter where
25 the amount in controversy fails to exceed \$5,000. *All five* of these felony charges seem civil,
26

1 related to some alleged breach of contract. Neither Mr. Paterson's civil liability nor criminal
2 culpability have been proven. Because the allegation of commission of the crimes in the instant
3 case did not occur "when the person charged is already admitted to bail on a separate felony
4 charge," the provisions of Ariz. Const. Art. 2 § 22(2) do not apply. Mr. Paterson is entitled to
5 reasonable bail calculated *only* to secure his future appearance.
6

7 That calculation does not amount to much. Mr. Paterson has long-standing business and
8 family ties to the community. Mr. Paterson's wife lives and works in Lake Havasu City. Mr.
9 Paterson's other ties are close and proclaim him to be a trustworthy citizen of Mohave County.
10 This is most clearly indicated by the more than 15 letters attached to this Motion. Mr. Paterson
11 has absolutely no prior criminal record whatsoever. Further, Mr. Paterson has already shown his
12 reliability in appearing for the above related proceedings by appearing several days *early* and
13 requesting an immediate audience before Division 5 of the Superior Court. Mr. Paterson is
14 absolutely no flight risk.
15

16 Given the foregoing considerations, the only logical reasons *not* to reduce bail
17 significantly, remove the cash requirement of such bail, or even release Mr. Paterson on his own
18 recognizance have to do precisely with those considerations prohibited above by the Arizona
19 Supreme Court: to prevent him from making bail and seemingly, given the publicity and
20 prominence of the alleged victims involved, to punish. The mere appearance of such impropriety
21 is sufficient to offend the sensibilities of the laws of the State of Arizona and the jurisprudence of
22 American law as applied to the rights of those accused and presumed innocent. For these reasons,
23 this Honorable Court is urged to release Mr. Paterson on his own recognizance or, alternatively
24 to reduce bail, without cash requirement, to an amount calculated to secure appearance upon his
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1 release.

2 **RELEASE OF CELLULAR PHONE**

3 At the time that Mr. Paterson was taken into custody on 18 May 2007, the arresting
4 officers seized Mr. Paterson's personal cellular phone. No explanation for this action was given,
5 nor was any probable cause identified to Mr. Paterson. Mr. Paterson was not presented with a
6 warrant for seizure of his telephone. Mr. Paterson's cellular phone is important to him because it
7 comprises his entire address book for contacts with family, friends, and business acquaintances.
8

9 The Fourteenth Amendment to the Constitution of the United States provides in pertinent
10 part:

11 No State shall make or enforce any law which shall abridge the privileges or
12 immunities of citizens of the United States; nor shall any State deprive any person of life,
13 liberty, or property, without due process of law; nor deny to any person within its
14 jurisdiction the equal protection of the laws.

15 Incorporated as the law of the State of Arizona from the foregoing "privileges and
16 immunities" and "due process" clauses is the Fourth Amendment from the same supreme law,
17 which mandates that:

18 The right of the people to be secure in their persons, houses, papers, and effects,
19 against unreasonable searches and seizures, shall not be violated, and no warrants shall
20 issue, but upon probable cause, supported by oath or affirmation, and particularly
21 describing the place to be searched, and the persons or things to be seized.

22 In the foregoing, the officers arresting Mr. Paterson had no probable cause, or warrant
23 articulating the same, to seize his cellular phone. Further, no due process by regular judicial
24 notice and hearing has resulted in a determination that Mr. Paterson should be deprived of his
25 cellular phone. For this reason, it is just and proper that orders should issue from this Honorable
26 Court directing the arresting officers to restore Mr. Paterson's cellular phone to him immediately.
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SCANNED

1 **REQUEST FOR DEFENDANT TO CHANGE INTO COURT ATTIRE**

2 As of this writing, arraignment is scheduled for 29 May 2007 before this Honorable
3 Court. In the event that Mr. Paterson remains in custody for that hearing, it is further requested
4 that Mr. Paterson be allowed to change into appropriate court attire as an alternative to the orange
5 jail uniform he now wears prior to the hearing. Mr. Paterson's family will make the arrangements
6 to convey his personal court attire to him prior to the hearing. Because of the media attention
7 already attached to Mr. Paterson, it is anticipated that media coverage will occur at the 29 May
8 2007 arraignment. Mr. Paterson is justifiably concerned that the news photographs at that hearing
9 will only further serve to prejudice him in the community and, potentially, in these proceedings.
10 Permission for Mr. Paterson to change into appropriate court attire is therefore in the interests of
11 justice and the Defendant's own dignity.
12
13

14
15 A copy of the foregoing mailed this 25th day of May 2007 to:

16 Mohave County Attorney
17 P.O. Box 7000
18 Kingman, Arizona 86402

19 Law Offices of the Mohave County Public Defender
20 P.O. Box 7000
21 Kingman, Arizona 86402

22 By: 

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SCANNED

Michele Webb
2915 Maverick Circle N
Lake Havasu City, AZ 86404

May 11, 2007

Letter of Reference for Ron Paterson

I have known Ron Paterson for three years. As a coach, President of both Little League and Pop Warner, a friend and as a first time concert promoter. I am fairly knowledgeable about his character and abilities.

What I can testify to is that Mr. Paterson is a man of outstanding character: hardworking, trustworthy and loyal. He has high standards for himself, his children and the organizations he involves himself with.

I have worked beside Mr. Paterson during his involvement with Pop Warner football here in Lake Havasu. He was my son's coach for the last two years. He inspired me to get involved and volunteer my time, due to his enthusiasm and genuine caring and desire to create a strong organization for our community.

Mr. Paterson also brought to Lake Havasu an amazing event, the Rockfest of which I was lucky enough to be part of. I saw this event as an amazing opportunity for Lake Havasu and like Mr. Paterson believed wholeheartedly that it would be well received and hoped for more events of its kind in the future. There was no evidence to me at anytime that this event was brought forth as fraudulent or deceiving, it is an unfortunate circumstance that it was not well received by some.

Sincerely,



Michele Webb

Phone (928) 855-1054
(800) 858-1859 • Fax (928) 855-3329



2761 Maricopa Ave
Lake Havasu City, Arizona 86406

May 11, 2007

Letter of Reference for Ron Paterson

I have known Ron Paterson for three years. As a coach, as an Executive Board Member of Pop Warner as well as Little League, and as a friend, I feel compelled to serve as a reference to his character.

In the last few years serving as an assistant coach beside Mr. Paterson I have seen first hand the conviction and dedication toward the betterment of youth sports in our community. He has spent countless hours volunteering his time. He had even sponsored some at risk children out of his own pocket to be sure they were able to participate. I witnessed continuous encouragement and emphasis on school and grades.

I attended the Rockfest event in October and was impressed that such an event was able to take place in Lake Havasu. Unfortunately Mr. Paterson has come under fire for his inexperience as a promoter and his intentions have been questioned. I believe his intention and vision for this event was of good character and I hope to see more events of this kind come to our community.

Sincerely,

Mike Webb
General Manager



www.havasupestcontrol.com • E-mail: dragonfly@ctlink.net

SCANNED

Phone (928) 855-1054
(800) 858-1859 • Fax (928) 855-3329



2761 Maricopa Ave.
Lake Havasu City, Arizona 86406

To Whom It May Concern:

I would like to speak of the character of Ron Paterson. Ron Paterson has done business with Havasu Pest Control for several years and has always taken care of his responsibility with our company. I went to the Rock Festival myself and thought it was an outstanding event.

It makes me wonder why the city is involved in Ron Paterson's unpaid debt. It is obvious that his intentions were not to commit fraud, otherwise wouldn't he have simply not paid anyone. It is my understanding, from the local press, that Ron Paterson has paid a large percent of the debts incurred by his event. Is it not the vendors who are stilled owed money responsibility to collect, outside of our local government?

Being a sub contractor in construction I have had a number of contractors, 'run out of money', and it was my responsibility to try and get payment. Is this not the same?

Ron Paterson is not a criminal. He may have made a poor business venture, but not a criminal.

Sincerely,

Suzanne D. Stebila
Suz Stebila



www.havasupestcontrol.com • E-mail: dragonfly@citlink.net

SCANNED

MAY-13-2007 12:03

SCFaz

928 505 8111

P.01

May 13, 2007

To Whom It May Concern:

Ron Paterson is a good guy. I have known him and his family for 4 years. His sons are good friends of mine. Ron coached me in football and baseball. I have spent several nights over his house and he is a very nice person. He is a good father.

Sincerely,

Tyler Ellison

Tyler Ellison

SCANNED

MAY-13-2007 12:03

SCFaz

928 505 0111

P.02

May 13, 2007

To Whom It May Concern:

I have known Ron Paterson for 4 years. He is a great father and husband. His family wife and sons are wonderful. His sons are good friends of my son and his boys are good boys. I have been involved with Ron through Little League and Pop Warner, as a dedicated parent, a team mom and a board member. Ron has coached my son in these sports. Ron has served as president on the Little League and Pop Warner sports for a couple of years and did a good job. I helped and worked as a volunteer for the 3 day Rock Fest. I was there around 10 hrs to 12 hrs a day. I really feel the Rock Fest was something great for this city. I would attend and volunteer again.

Sincerely,



Cheryl Kochever

Ron Paterson

From: dragonfly@citlink.net
Sent: Sunday, May 13, 2007 5:24 PM
To: ron@arizonaloanguy.com
Subject: Fwd: Ron Patterson Letter

May 13, 2007

To Whom It May Concern:

I have known Ron Patterson for four years. He is a personal friend and we have both coached children for Pop Warner football and Little League baseball.

Ron has always proven to be generous and dedicated in every endeavor that we have volunteered for. He is a dedicated father and his family is very important to him.

Through my personal business, I have done work for Ron and he was honest and upfront during the entire project. I did not have any problems working with him during this business undertaking.

Sincerely,

Joseph Behmer
2245 Casper Dr.
Lake Havasu City, AZ 86406

5/14/2007

SCANNED

Ron Paterson

From: dragonfly@citlink.net
Sent: Sunday, May 13, 2007 5:25 PM
To: ron@arizonaloanguy.com
Subject: Fwd: Ron Patterson Character Letter

May 13, 2007

To Whom It May Concern:

I have known Ron Patterson for over four years. He is a personal friend and our families have gathered together on several occasions. I have also volunteered with Ron on the Executive Boards for Pop Warner football and Little League baseball during the last four seasons.

Ron has always shown to be very honest and generous. He is a dedicated father and there have been several occasions that he has helped out less fortunate children by paying for their registration fees for football when their families could not afford the fee.

Ron has volunteered and donated many man-hours and personal time to these organizations and he always wants what is best for the children. The concern and example of dedication he has shown to these young men is helping to mold them into leaders of our future communities.

Sincerely,

Jennifer Behmer
2245 Casper Dr
Lake Havasu City, AZ 86406

SCANNED

May 11, 2007

Your Honor,

Please allow me to take the time to offer a personal character reference for Ron Patterson.

In the time I have known Ron; I have been impressed with his dedication to the community. He is a man of integrity, and is extremely dedicated to his family and work.

I would also like to add that Ron was my son's football coach; he taught more than football to the kids, he is a great asset to the community of Lake Havasu City.

Sincerely,

Kimberley Wegner

SCANNED

To Whom It May Concern:

I am writing on behalf of Ron Paterson and BKR Productions. Working with Ron for the Lake Havasu Rock Fest turned out to be a very positive experience. I play drums for Nick Sterling who is a home-town Havasu native. Ron invited us to play the show and gave us a great time slot before one of the headlining bands on the main stage.

I also have my own band Razer. I had asked Nick Sterling's father Jim if it would be ok to ask Ron if my band Razer could play the festival as well. He told me since it was early enough in the year that I might have a chance so I contacted Ron. Ron was gracious enough to accept even though he was inundated running the festival. He not only gave Razer the best possible time-slot he could to someone he doesn't know but he accommodated the band member's women and crew. I can speak on behalf of Razer that everyone was appreciative for a fun trip.

The equipment that BKR Productions provided was completely professional. The stages were nice and big and the sound systems and crew were very professional. The time slots that Ron worked out for me to play in both bands went smooth. I was able to get equipment from one stage to the other with a lot of help from the ground crews. Security and the organization of the festival logistics seemed in tact. I did not experience anything that made me have a negative experience.

I also got to meet and mingle with a famous drummer by the name of Vinnie Appice. He is the drummer for Black Sabbath who was playing in The Hollywood All-Stars at the festival. He's actually one of my biggest idols and influences and if were not for Ron Paterson, having the right mind and enthusiasm to hire artists like Nick Sterling, I would have never met him.

I think that running your first festival is a daunting task to say the least. I believe that the next one would only be better and would have a positive effect on Lake Havasu.

Thank you,

Enc Bongiorno

SCANNED

Ron Paterson

From: Kathy Chalmers [kcc@citlink.net]
Sent: Monday, October 23, 2006 11:17 AM
To: epress@maddog.net
Cc: ron@BKRpromotions.com
Subject: e-press

You should be ashamed of yourself for the report you did on the "Rockfest".
Where are you getting your information?
Nothing that you printed should have been. The ROCKFEST was a GREAT event.
It should make the City of Lake Havasu Proud.
Every time something good comes to town, the media and others find a way to sabotage it,
one way or another. If I were Mr. Paterson, I would find a way to get a restraining order
against you and Murphy Broadcasting. By the way, how many private businesses answer their
phone on a Sunday? How many of your vendors are paid net 30 or even net 60?
You need to get your facts correct, not take the word of one disgruntled customer. And
you wonder why we don't believe half of what we read!

Kathy Chalmers

SCANNED

Ron Paterson

From: Stereo Suite [info@stereosuite.com]
Sent: Wednesday, October 11, 2006 6:47 PM
To: Jeff E Adams; 'Ron Paterson'
Subject: Rockfest 2007??

Hey guys!!

Just wanted to drop a line and say that we had such a great time this weekend playing for you all. Everyone was very accomodating over the weekend and we look forward to doing it again next year (hopefully on the main stage). The hotel was great and so were the people. Let us know if any of you ever have anything else like this going on or any leads in general in regards to playing a show(s). Thanks for everything.

All our best,
Sean, Joe, Travis, and Pharoah of Stereo Suite

PS- Thanks for the backstage passes for Sunday. Also...what was the name of the sound company you used from San Diego. They were working the Anderson Toyota Stage. Thanks again!!

SCANNED 1

Ron Paterson

From: Havasu Pest Control [dragonfly@citlink.net]
Sent: Friday, May 11, 2007 11:34 AM
To: Zeny Gregorio
Subject: Re: Letter

Thanks Zeny

----- Original Message -----

From: "Zeny Gregorio" <zgregorio212@hotmail.com>
To: <dragonfly@citlink.net>
Sent: Friday, May 11, 2007 12:29 PM
Subject: RE: Letter

>I would like him to come back and volunteer himself as a coach again, it
>was a pleased to have him last summer. I dont have any problems with him
>being as a coach. It would be a great help if he could.

> Regards,
> Zeny (:
>
>

SCANNED

*Alan Samuelson
3470 Little Chief Dr.
Lake Havasu City, AZ 86406*

May 11, 2007

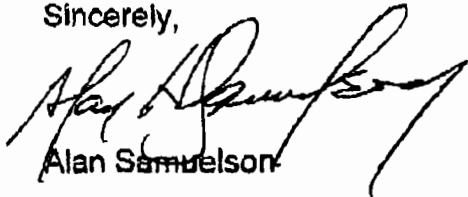
Letter of Reference for Ron Paterson

I met Ron Paterson when a friend asked me if I would like to be involved with the Rockfest. I worked for Mr. Paterson the entire weekend managing the grounds workers and as a type of "go to" guy for the various volunteers and paid workers.

Mr. Paterson was at the event the entire weekend, working with all of us to ensure its success. His enthusiasm and excitement of being able to bring such an event to this community was contagious.

I feel badly about the backlash and accusations that have come forth since the event because I was there and believe that any losses that may have occurred are due to inexperience and not fraud or misrepresentation.

Sincerely,


Alan Samuelson

To whom it may concern:

I am writing on Ron's behalf. Ron has been my baseball coach 5 years. He has also been my football coach 1 year. Ron is a good man. He does get competitive, but who doesn't get competitive once in a while?

Every year that Ron has been my coach I have liked him. He is my favorite coach. His son is also one of my friends. Ron is really cool when you get to know him. He is really fun.

His family is really nice to my family. I know Ron cares. When my grandpa died he took the time to come to his funeral. That shows he has a good heart. Ron is a really great guy.

Sincerely,
Johnny Baker, age 12,

May 11, 2007

To Whom It May Concern,

I am writing this letter on behalf of Mr. Ron Patterson. I have felt compelled to show my support due to his recent change in circumstances. I have known Mr. Patterson for approximately 5 years. I met him when my grandson started playing baseball. Mr. Patterson has coached my grandson every year during the baseball season. He was also his coach for football. I have observed Mr. Patterson over the years as he has proven to be excellent with kids. His whole family has treated my family with the utmost respect and kindness. In all of my dealings with Mr. Patterson he has shown himself to be very honest. Ron has been such a wonderful inspiration to my grandson as he grows older.

When you think of the sports program in Lake Havasu City my first thought is of Ron Patterson. He has invested so much of his time into the Parks and Recreation of Lake Havasu City. This time has been given on a voluntary basis. He has always shown himself to go above and beyond what is necessary of him for the sake of others.

Mr. Patterson tried to make a difference in Lake Havasu City by providing the Rockfest. Lake Havasu City needs Ron Patterson to provide this sort of entertainment and give back to the community. It makes my heart sad to read the paper and see Mr. Patterson portrayed in such a bad light. Thank you for your consideration.

Sincerely,

Joyce, Tina, Tommy,
Jimmy & Teresa
Baker

SCANNED

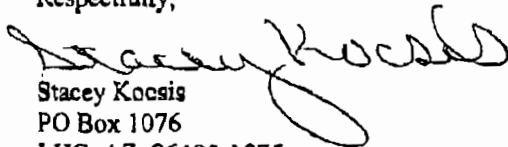
05/11/07

To Whom This Will Concern,

I have had the opportunity to cross paths with Ron Patterson over the past several years and was surprised to have read the paper this week. To my knowledge, Ron has always been motivated towards the positive outcomes, whether it has been from being President of Lake Havasu Little League or Pop Warner.

My son and I even worked the Rock Fest and through out Friday and Saturday's event, I spoke with Ron and his outlook was very positive for not only the event, but the generation of revenue for Lake Havasu itself. How future events would bring crowds of people who may have never came to Lake Havasu and to give our residents the opportunity to attend a mega concert without having to travel to Vegas, Phoenix or California.

Respectfully,



Stacey Kocsis
PO Box 1076
LHC, AZ 86405-1076

SCANNED

FILED

BY: _____

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

2007 MAY 30 PM 2:51
Am
VIRGIL J. HELL
SUPERIOR COURT CLERK

HONORABLE ROBERT R. MOON, JUDGE
DIVISION V
DATE: MAY 29, 2007

NOTICE

STATE OF ARIZONA,)	
Plaintiff,)	
)	
vs.)	NO. CR-2007-789
)	
RONALD JAMES PATERSON,)	
Defendant.)	

The defendant has filed a motion to reconsider release conditions and the state has additional time to file a response.

IT IS ORDERED setting oral argument on the motion for Friday, June 8, 2007 at 10:00 a.m., which is the same time as the hearings scheduled in CR-2007-667.

cc:

Mohave County Attorney

Timothy D. Bennett
Attorney for defendant

Mohave County Jail

Honorable Robert R. Moon
Division V

SCANNED

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

**HONORABLE LEE JANTZEN
DIVISION: COMMISSIONER
DATE: 05/31/2007
TIME: 8:55 a.m.**

**VIRLYNN TINNELL, CLERK
DANIELLE DEBARGE, DEPUTY CLERK
DIGITALLY RECORDED**

ARRAIGNMENT

**STATE OF ARIZONA
Plaintiff,**

CR-2007-0789

vs.

**RONALD JAMES PATERSON,
Defendant.**

APPEARANCES: Jeremy Huss, Deputy County Attorney; Tim Bennett, Attorney for and with the Defendant.

This is the time set for Arraignment. The Court finds that the Defendant has received a copy of the Indictment, and his true name is set forth thereon.

Counsel for the Defendant waives the reading, and enters a not guilty plea on behalf of the Defendant.

IT IS ORDERED directing the Clerk to enter the not guilty plea of record.

IT IS FURTHER ORDERED setting this matter for **Case Management Hearing on Thursday, June 14, 2007 at 10:00 a.m.**

The Court admonishes the Defendant and advises him of the disclosure process, and advises him that his failure to appear at any further hearing will result in the issuance of a bench warrant.

Discussion ensues as to other pending cases, discovery and possible enhancement motions. The Court advises the Defendant of the possible range of penalties involved.

The Court recesses at 9:00 a.m.

cc:
Mohave County Attorney

Tim Bennett
Attorney For Defendant

Mohave County Jail

Honorable Robert R. Moon
Division 5

Honorable Lee F. Jantzen
Commissioner

Clerk

FILED

BY: *[Signature]*

2007 MAY 31 PM 3:18

W. G. TAYLOR
SUPERIOR COURT CLERK

1 Dana P. Hlavac
Mohave County Public Defender
2 Clarence Jenkins
Deputy Public Defender
3 State Bar No. 011543
318 N. Fifth Street
PO Box 7000
4 Kingman, AZ 86402-7000
Telephone: 928 / 753-0734
5 Fax No.: 928 / 753-0793
Attorney for Defendant

6
7 **IN THE SUPERIOR COURT, DIVISION V, OF THE STATE OF ARIZONA**
8 **IN AND FOR THE COUNTY OF MOHAVE**

9 STATE OF ARIZONA,
10 Plaintiff,
vs.

Case No. **CR-2007-0789**

NOTICE OF APPEARANCE

11 RONALD JAMES PATERSON,
12 Defendant.

13 Pursuant to 17A A.R.S. Rules of Criminal Procedure, Rule 6.3, the Public Defender's Office
14 hereby enters its appearance on behalf of the Defendant, RONALD JAMES PATERSON.

**DANA P. HLAVAC
PUBLIC DEFENDER**

15
16
17 RESPECTFULLY SUBMITTED THIS
31 DAY OF MAY, 2007.

[Signature]
By Clarence Jenkins Deputy
Attorney for Defendant

18
19
20 Copy of the foregoing mailed/delivered/faxed
this 31 day of May, 2007 to:

21 Attn: Jeremy L. Huss
Mohave County Attorney's Office

22
23 By *[Signature]*

24
25
26
SCANNED

1 Dana P. Hlavac
Mohave County Public Defender
2 Clarence Jenkins
State Bar No. 011543
3 318 N. Fifth Street
PO Box 7000
Kingman, AZ 86402-7000
4 Telephone: 928 / 753-0734
Fax No.: 928 / 753-0793
5 Attorney for Defendant
6

FILED
BY:

2007 MAY 31 PM 3:18

W. J. TUNELL
SUPERIOR COURT CLERK

Clerk

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

9 STATE OF ARIZONA,
10

11 Plaintiff,

12 vs.

13 RONALD JAMES PATERSON,
14

15 Defendant.

Case No.: CR-2007-0789

DEFENDANT'S RULE 15.2
DISCLOSURE AND REQUEST
FOR RULE 15.1(h) DISCLOSURE

16 **COMES NOW**, the Defendant, by and through counsel undersigned,
17 pursuant to Rule 15.2(b) of the Arizona Rules of Criminal Procedure, hereby gives
18 notice that the defenses below may be raised at trial:

19 General Denial.

20 In support of the above defense(s), the Defendant may call the following
21 witnesses:

- 22 1. The Defendant;
- 23 2. Any and all individuals named or referred to in the departmental report and
24 preliminary hearing transcript, the grand jury transcript, or police
25 departmental reports as provided by the State.
- 26 3. Additional Persons who may be called as witnesses at trial, including their names,
addresses, and all statements made by them in connection with the case, and each

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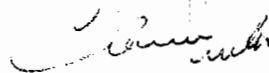
defense that their testimony may support are as follows: **will be supplemented and provided as identified through additional investigation and case preparation.**

4. Pursuant to Rule 15.2 (c)(3), the following tangible documents /objects may be used at trial: any and all physical, or documentary evidence referred to in the departmental report and preliminary hearing transcript, the grand jury transcript, or police departmental reports as provided by the State and such supplemental evidence as may be developed through investigation and case preparation. Such material will be disclosed upon its' identification and determination of use for trial.

5. Pursuant to Rule 15.1(d)(3) and Rule 15.1(h), Arizona Rules of Criminal Procedure, the Defendant hereby requests disclosure of the names and addresses, together with their written or recorded statements of all persons whom the State will call as rebuttal witnesses, together with a list of prior convictions of **all** disclosed witnesses that may be used for impeachment purposes.

RESPECTFULLY SUBMITTED this 31 day of MAY, 2007.

DANA P. HLAVAC
MOHAVE COUNTY PUBLIC DEFENDER

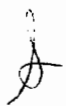


By Clarence Jenkins
Deputy Public Defender
Attorney for Defendant

Copy of the foregoing
mailed/delivered this 31 day of May,
2007 to:

Mohave County Attorney
Attn: Jeremy L. Huss

By



LAKE HAVASU CONSOLIDATED COURT

2001 COLLEGE DRIVE
LAKE HAVASU CITY, AZ 86403
(928)453-0705

mh

2007 JUL 15 PM 2:40
CLERK OF COURT

STATE OF ARIZONA,

Plaintiff,

vs.

CAUSE NO.: CR-2007-0789

RONALD J PATERSON,

Defendant.

TRANSMITTAL CERTIFICATION

I hereby certify that the enclosed items constitute a true and complete record of the preliminary proceedings held in the above-entitled case appearing in my Docket No. J -0804 - FR - 0200700333.

The following items are included:

- The original complaint, including amendments, if any:
- The arrest warrant or summons.
- The defendant's release questionnaire.
- The defendant's financial statement.
- Release Order
- Bond Information: _____ Cash Posted, Receipt#: _____ Check #: _____
Bond Company: _____ Power #: _____
Amount of Bond: \$ _____
- Order Appointing Counsel. Notice of Appearance: Timothy Bennett
- Defendant paid \$ _____ towards Public Defender Fees.
- Defendant to Pay \$ _____ toward Public Defender Fees. Not Received prior to transfer.
- Motions of the State and/or Defense
- Copy of Notice of Supervening Indictment
- Bind Over Order (Preliminary Hearing)
- Order holding the defendant to answer in Superior Court.
- Disposition Sheet/s
- Other. (Describe) reference letters

July 3, 2007

[Signature]
(Signature) CLERK OF COURT

SCANNED

TIME FILED M

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

MAY 24 2007

BY: VIRLYNN TINNELL
CLERK SUPERIOR COURT
DEPUTY

STATE OF ARIZONA,
Plaintiff,

CR-2007-0789

vs.

NOTICE OF SUPERVENING INDICTMENT
and
NOTICE OF ARRAIGNMENT

RONALD JAMES PATERSON
Defendant(s).

MAY 29 2007

TO THE ABOVE NAMED DEFENDANT(S) AND COUNSEL:

In accordance with Rule 12.7, Arizona Rules of Criminal Procedure you are hereby notified that the above named Defendant(s) have been indicted for the offense(s) charged in the attached Indictment, and that the Defendant(s) is to appear **IN PERSON** for Arraignment in the Mohave County Superior Court, In the Court Commissioner's Courtroom, 3rd Floor, Mohave County Courthouse, 401 E. Spring Street, Kingman, Arizona on Thursday, **May 31, 2007 at the hour of 8:30 a.m.**

YOU ARE FURTHER NOTIFIED THAT IF ANY DEFENDANT FAILS TO APPEAR, HIS OR HER RELEASE MAY BE REVOKED AND BOND, IF ANY FORFEITED.

DATED this 24th day of May, 2007.

VIRLYNN TINNELL
CLERK OF THE SUPERIOR COURT

BY: 
DEPUTY CLERK

Copy of the foregoing mailed by first class, postage pre-paid to the following persons at the addresses shown, as provided by the County Attorney:

Mohave County Attorney

RONALD JAMES PATERSON
c/o Mohave County Jail
Defendant

Mohave County Public Defender
Attorney for Defendant

Mohave County Jail

Lake Havasu City Justice Court JFR-2007-00383

SCANNED

FILED
MAY 24 2007
M

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

HONORABLE STEVEN F. CONN
DIVISION: 3
DATE: MAY 24, 2007
TIME: 3:58 P.M. - 4:31 P.M.

VIRLYNN TINNELL
CLERK SUPERIOR COURT
BY: VIRLYNN TINNELL, CLERK
CAROL BEEZER, DEPUTY CLERK
STEVE GARWOOD, COURT REPORTER

RETURN OF GRAND JURY INDICTMENT

STATE OF ARIZONA,
Plaintiff,

vs

CR-2007-0789

RONALD JAMES PATERSON
Defendant(s)

APPEARANCES: Kenneth N. Skousen, Deputy County Attorney.

The Court finds that there is 16 members of the Grand Jury present.

The Court finds that the Indictment contains 2 count(s), and each has been signed a True Bill by Rick Allsup, Grand Jury Foreman, and has also been signed by the Deputy County Attorney.

IT IS ORDERED directing the Clerk to file the Indictment and Minutes, along with any exhibits, and assign it the above cause number.

IT IS ORDERED that a Notice of Supervening Indictment shall issue.

IT IS ORDERED assigning this matter to Honorable Robert R. Moon, Division 5.

IT IS FURTHER ORDERED setting this matter for Arraignment on **Thursday, May 31, 2007 at 8:30 a.m.**, before the Commissioner Lee Jantzen, in the Court Commissioner's Courtroom, Third Floor. (Formerly the Visiting Judges Courtroom)

cc:

Mohave County Attorney

Mohave County Public Defender
Attorney for Defendant

SCANNED

FILED
BY M7

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

2007 MAY 24 PM 4:55

IN AND FOR THE COUNTY OF MOHAVE

RECEIVED
SUPERIOR COURT CLERK

STATE OF ARIZONA,

DR#: LHCPD 2007-003721

Plaintiff,

FELONY INDICTMENT

vs.

NO.: CR-2007- 789

RONALD JAMES PATERSON,
DOB: 09/26/1962

139-GJ-23

Defendant.

MOON

The Grand Jurors of Mohave County, Arizona, accuse **RONALD JAMES PATERSON**, charging that in Mohave County, Arizona:

COUNT 1: THEFT, CLASS 5 FELONY

On or about the 14th day of February, 2007, in the vicinity of 800 Park Hill Avenue, Bullhead City, Mohave County, Arizona, said Defendant, RONALD JAMES PATERSON, committed theft of currency belonging to Maurice Trudell, with a value of \$2,000.00 or more, all in violation of A.R.S. §§ 13-1802, 13-1801, 13-701 and 13-801, a Class 5 Felony.

MATTHEW J. SMITH
MOHAVE COUNTY ATTORNEY

" A TRUE BILL "
FOREMAN WRITES "A TRUE BILL"

LR Albright
BY LEROY R. ALBRIGHT
DEPUTY COUNTY ATTORNEY

Rick Allsup
FOREMAN OF THE GRAND JURY

COUNT 2: THEFT, CLASS 5 FELONY

On or about the 28th day of March, 2007, in the vicinity of 800 Park Hill Avenue, Bullhead City, Mohave County, Arizona, said Defendant, RONALD JAMES PATERSON, committed theft of currency belonging to Maurice Trudell, with a value of \$2,000.00 or more, all in violation of A.R.S. §§ 13-1802, 13-1801, 13-701 and 13-801, a Class 5 Felony.

MATTHEW J. SMITH
MOHAVE COUNTY ATTORNEY

"A TRUE BILL"
FOREMAN WRITES "A TRUE BILL"

Ray
BY LEROY R. ALBRIGHT
DEPUTY COUNTY ATTORNEY

Tim Alsup
FOREMAN OF THE GRAND JURY

WITNESS: LHCPD

FILED
BY MY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

2007 MAY 24 PM 4:55

IN AND FOR THE COUNTY OF MOHAVE

CLERK
SUPERIOR COURT

STATE OF ARIZONA,

Plaintiff,

GRAND JURY MINUTES

vs.

**RONALD JAMES PATERSON,
DOB: 09/26/1962**

NO.: CR-2007- 789

139-GJ-23

Defendant.

MOON

At a session of the Grand Jury of the County of Mohave held this 24th day of May, 2007, the above defendant being accused of the crime(s) of COUNTS 1 and 2: THEFT, CLASS 5 FELONY, committed in Mohave County, Arizona, on or about the 14th day of February and the 28th day of March, 2007, based upon the following witness:

NAME: DATE APPEARED

LHCPD May 24, 2007

having appeared before the Grand Jury and having given testimony under oath before the Grand Jury; which testimony was reported by the Reporter of the Grand Jury on the days that such testimony was given;

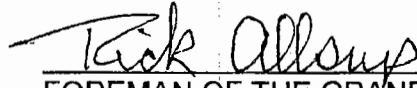
the Grand Jury with 16 members present, and only members of the Grand Jury present, deliberated upon the evidence and with 16 jurors voting, by a vote of 16 to 0, returned A TRUE BILL

COUNT 1: THEFT, CLASS 5 FELONY

Rick Albright
FOREMAN OF THE GRAND JURY

the Grand Jury with 16 members present, and only members of the Grand Jury present, deliberated upon the evidence and with 16 jurors voting, by a vote of 16 to 0, returned ATRUE Bill.

COUNT 2: THEFT, CLASS 5 FELONY



FOREMAN OF THE GRAND JURY

TIMOTHY D. BENNETT
Attorney at Law
5473 Peace River Ct.
Las Vegas, NV 89148
(702) 810-0373/ FAX (702) 953-7360
AZ Bar # 021426
Attorney for the Defendant

**IN THE LAKE HAVASU CITY CONSOLIDATED COURTS
JUSTICE COURT, LAKE HAVASU CITY PRECINCT**

No. JFR 2007-00333

STATE OF ARIZONA

Plaintiff,

vs.

RONALD JAMES PATERSON,

Defendant.

NOTICE OF APPEARANCE

AND

**MOTION TO RECONSIDER
BAIL/RELEASE CONDITIONS**

AND

**MOTION FOR RELEASE OF SEIZED
PROPERTY**

AND

**MOTION TO APPEAR
TELEPHONICALLY**

(Expedited hearing requested)

TIMOTHY D. BENNETT herewith submits and enters his notice of appearance for the Defendant.

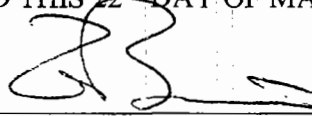
Additionally, by and through undersigned counsel, Defendant respectfully moves this Honorable Court to reconsider the release conditions ordered in this matter, which includes an order of cash bail in the amount of \$100,000. Further, Defendant moves this Honorable Court to order the release of his cellular phone, seized by the police without probable cause. Finally, undersigned counsel requests that an expedited hearing be scheduled in this matter and that said counsel be permitted to appear telephonically for the same. These Motions are supported by the following Memorandum of Points and Authorities and various letters from the community,

1 incorporated by reference herein.

2 RESPECTFULLY SUBMITTED THIS 22nd DAY OF MAY 2007.

3

4



Timothy D. Bennett
Attorney for Defendant

5

6

MEMORANDUM OF POINTS AND AUTHORITIES

7

BAIL

8

In the above cause, Mr. Paterson is alleged to have committed two counts of theft, each
9 class 5 felonies. Mr. Paterson is also charged with three further counts of felony theft in cause
10 number CR-20070667 before the Mohave County Superior Court, Division 5 (*see* "Case Detail"
11 attached hereto). All five theft counts in both the instant cause and CR-20070667 arise from
12 contracts or other business transactions between Mr. Paterson and the alleged victims that have
13 apparently fallen into some dispute. Indeed, at first blush it would seem that all five counts have
14 the appearance of purely *civil* matters. The cumulative value of the amounts in controversy in the
15 instant cause barely exceeds the amount otherwise jurisdictionally appropriate to small claims.
16 However, it is also clear that this matter has received much press attention, and that many of the
17 alleged victims are fairly financially prominent in the community.

18

19

In cause CR-20070667, Mr. Paterson's appearance was ordered secured by a \$60,000
20 security bond, which was posted on or about 14 May 2007. It is noteworthy that Mr. Paterson
21 was scheduled to appear in that matter for an arraignment at a later date, for which the Mohave
22 County Attorney's office had apparently arranged further press coverage. However, Mr. Paterson
23 eagerly walked into Division 5 on 14 May 2007, requesting an immediate appearance with the
24 Hon. Robert R. Moon to appear on his initial three theft charges. It was only days later on Friday
25
26
27

28

1 18 May 2007 that Mr. Paterson was arrested in the instant cause at an hour too late to secure
2 counsel or otherwise prepare to fully discuss release conditions at the hearing that occurred in
3 this matter on Saturday 19 May 2007. Given the press coverage and the prominence of the
4 alleged victims, it is at this point that the apparent implications for justice in this matter would
5 take a more sinister turn, one that seems to attempt to extort civil relief from Mr. Paterson by
6 abuse of criminal process.
7

8 On Saturday 19 May 2007, during a hearing conducted by video while he was held in
9 custody, Mr. Paterson's appearance at future proceedings in this matter were initially secured by
10 a security bond of \$100,000. Shortly after, as if by some second thought, Mr. Paterson was
11 notified that this appearance would be secured by *cash* bond only, in the same amount. No
12 explanation for this last moment change was given. While Mr. Paterson would have been able to
13 obtain a security bond over the weekend, he is unable to generate that amount in cash, whether
14 upon short notice at the weekend, or at any other time. As a result, as of this writing, Mr.
15 Paterson has been wrongfully deprived of his freedom for six days, with no immediate
16 restoration to freedom in sight. During this unjust incarceration, effectively a punishment before
17 conviction, Mr. Paterson has suffered blood pressure of 174 over 112. This has prompted the
18 nurse at the Mohave County Jail to recommend Mr. Paterson's hospitalization; immediately prior
19 to his present incarceration, his blood pressure was approximated a health, normal 120 over 80.
20
21 *For these reasons, an expedited hearing is requested in this matter.*
22

23 The Eighth Amendment to the Constitution of the United States and the Constitution of
24 the State of Arizona (Art. 2 § 22) in identical language provide that:
25

26 *Excessive bail shall not be required, nor excessive fines imposed, nor cruel and*
27 *unusual punishments inflicted (emphasis added).*
28

1 While the "Bail Clause" of the Eighth Amendment is not seen as directly applicable to
2 state courts under the 14th Amendment doctrine of "incorporation," it is undisputed that civilized
3 jurisprudence, as magnified before the entire world by the laws of the United States, demands
4 that where a criminal defendant's appearance is to be secured by bail, that bail shall not be
5 excessive (*see Carlson v. Landon*, 342 U.S. 524 (1952)). "Excessive," in this instance is defined
6 as "bail in a sum more than will be reasonably sufficient to prevent evasion of the law by flight"
7 (*see Black's Law Dictionary*, 6th Ed.).
8

9 The Arizona Supreme Court agrees with this analysis, addressing the considerations for
10 setting reasonable bail in *Gusick v. Boies*, 72 Ariz. 233 (1951). The Court notes that the
11 determination of the amount of bail must be done in light of the constitutional prohibition against
12 excessive bail (*id.*) and should also take into account:
13

- 14 1) The nature and gravity of the offense charged
- 15 2) The character and reputation of the accused
- 16 3) His previous criminal record, if any
- 17 4) The measure of punishment which may be inflicted
- 17 5) The ability of the accused to give bail

18 In the foregoing, the Arizona Supreme Court confirmed that in Arizona a defendant must
19 be presumed innocent in fixing the amount of bail. The sole purpose of bail is to ensure
20 defendant's attendance when required. Therefore, any bail fixed at more than necessary to secure
21 a defendant's appearance is held to be excessive, in violation of the Arizona Constitution. If the
22 bail set prevents the defendant from making bail or punishes the person charged with a crime
23 before conviction, it is deemed excessive.
24

25 Mr. Paterson has already posted bail by security bond in the amount of \$60,000 in
26 Mohave County. It is noteworthy that this \$60,000 bail ordered is for three felony charges in
27

1 cause number CR-20070667, while the \$100,000 ordered in the instant matter is for two class 5
2 felony charges. This \$100,000 is meant to secure Mr. Paterson's appearance in a matter where
3 the amount in controversy fails to exceed \$5,000. *All five* of these felony charges seem civil,
4 related to some alleged breach of contract. Neither Mr. Paterson's civil liability nor criminal
5 culpability have been proven. Because the allegation of commission of the crimes in the instant
6 case did not occur "when the person charged is already admitted to bail on a separate felony
7 charge," the provisions of Ariz. Const. Art. 2 § 22(2) do not apply. Mr. Paterson is entitled to
8 reasonable bail calculated *only* to secure his future appearance.
9

10 That calculation does not amount to much. Mr. Paterson has long-standing business and
11 family ties to the community. Mr. Paterson's wife lives and works in Lake Havasu City. Mr.
12 Paterson's other ties are close and proclaim him to be a trustworthy citizen of Mohave County.
13 This is most clearly indicated by the more than 15 letters attached to this Motion. Mr. Paterson
14 has absolutely no prior criminal record whatsoever. Further, Mr. Paterson has already shown his
15 reliability in appearing for the above related proceedings by appearing several days *early* and
16 requesting an immediate audience before Division 5 of the Superior Court. Mr. Paterson is
17 absolutely no flight risk.
18

19 Given the foregoing considerations, the only logical reasons *not* to reduce bail
20 significantly, remove the cash requirement of such bail, or even release Mr. Paterson on his own
21 recognizance have to do precisely with those considerations prohibited above by the Arizona
22 Supreme Court: to prevent him from making bail and seemingly, given the publicity and
23 prominence of the alleged victims involved, to punish. The mere appearance of such impropriety
24 is sufficient to offend the sensibilities of the laws of the State of Arizona and the jurisprudence of
25
26
27
28

1 American law as applied to the rights of those accused and presumed innocent. For these reasons,
2 this Honorable Court is urged to release Mr. Paterson on his own recognizance or, alternatively
3 to reduce bail, without cash requirement, to an amount calculated to secure appearance upon his
4 release.

5 **RELEASE OF CELLULAR PHONE**
6

7 At the time that Mr. Paterson was taken into custody on 18 May 2007, the arresting
8 officers seized Mr. Paterson's personal cellular phone. No explanation for this action was given,
9 nor was any probable cause identified to Mr. Paterson. Mr. Paterson was not presented with a
10 warrant for seizure of his telephone. Mr. Paterson's cellular phone is important to him because it
11 comprises his entire address book for contacts with family, friends, and business acquaintances.
12

13 The Fourteenth Amendment to the Constitution of the United States provides in pertinent
14 part:

15 No State shall make or enforce any law which shall abridge the privileges or
16 immunities of citizens of the United States; nor shall any State deprive any person of life,
17 liberty, or property, without due process of law; nor deny to any person within its
jurisdiction the equal protection of the laws.

18 Incorporated as the law of the State of Arizona from the foregoing "privileges and
19 immunities" and "due process" clauses is the Fourth Amendment from the same supreme law,
20 which mandates that:

21 The right of the people to be secure in their persons, houses, papers, and effects,
22 against unreasonable searches and seizures, shall not be violated, and no warrants shall
23 issue, but upon probable cause, supported by oath or affirmation, and particularly
24 describing the place to be searched, and the persons or things to be seized.

25 In the foregoing, the officers arresting Mr. Paterson had no probable cause, or warrant
26 articulating the same, to seize his cellular phone. Further, no due process by regular judicial
27

1 notice and hearing has resulted in a determination that Mr. Paterson should be deprived of his
2 cellular phone. For this reason, it is just and proper that orders should issue from this Honorable
3 Court directing the arresting officers to restore Mr. Paterson's cellular phone to him immediately.

4 **TELEPHONIC APPEARANCE**

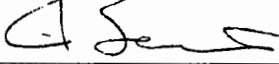
5 Finally, because of the urgency involved, and the distance necessitated for travel in this matter, it
6 is further requested that counsel be permitted to appear telephonically in support of this Motion.
7

8

9 A copy of the foregoing mailed this 22nd day of May 2007 to:

10 Mohave County Attorney
11 P.O. Box 7000
12 Kingman, Arizona 86402

13 Law Offices of the Mohave County Public Defender
14 P.O. Box 7000
15 Kingman, Arizona 86402

16 By: 

17

18

19

20

21

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28



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CASE DETAIL

Case Number: S-8015-CR-20070667	Case Category: Criminal	Case Title: STATE VS PATERSON	
Court: Mohave County Superior	Judge: ROBERT R MOON	Filing Date: 05/04/2007	Disposition Date:

Party Name: RONALD JAMES PATERSON	Party Type: D 1 - DEFNDT/RESPNDT	Date of Birth: 09/26/1962
Citation: CNONE		
Count 1: THEFT	Disposition Date:	Disposition:
Count 2: THEFT	Disposition Date:	Disposition:
Count 3: THEFT	Disposition Date:	Disposition:

Party Name: ARIZONA STATE OF	Party Type: P 1 - PLNTIF/PETITNER	Date of Birth:
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Event Date	Event Description	Party
5/15/2007	MOTION	D 1
5/14/2007	INITIAL APPEARANCE	D 1
5/14/2007	RELEASE ORDER	
5/10/2007	REQUEST	D 1
5/10/2007	WARRANT RETURNED	D 1
5/4/2007	ARREST WARRANT ISSUED	D 1
5/3/2007	GRAND JURY MINUTES	
5/3/2007	RETURN OF GRAND JURY INDICT.	
5/3/2007	INDICTMENT	

[Click here for court contact information.](#)

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SCANNED

Michele Webb
2915 Maverick Circle N
Lake Havasu City, AZ 86404

May 11, 2007

Letter of Reference for Ron Paterson

I have known Ron Paterson for three years. As a coach, President of both Little League and Pop Warner, a friend and as a first time concert promoter. I am fairly knowledgeable about his character and abilities.

What I can testify to is that Mr. Paterson is a man of outstanding character: hardworking, trustworthy and loyal. He has high standards for himself, his children and the organizations he involves himself with.

I have worked beside Mr. Paterson during his involvement with Pop Warner football here in Lake Havasu. He was my son's coach for the last two years. He inspired me to get involved and volunteer my time, due to his enthusiasm and genuine caring and desire to create a strong organization for our community.

Mr. Paterson also brought to Lake Havasu an amazing event, the Rockfest of which I was lucky enough to be part of. I saw this event as an amazing opportunity for Lake Havasu and like Mr. Paterson believed wholeheartedly that it would be well received and hoped for more events of its kind in the future. There was no evidence to me at anytime that this event was brought forth as fraudulent or deceiving, it is an unfortunate circumstance that it was not well received by some.

Sincerely,



Michele Webb

Phone (928) 855-1054
(800) 858-1859 • Fax (928) 855-3329



2761 Maricopa Ave.
Lake Havasu City, Arizona 86406

May 11, 2007

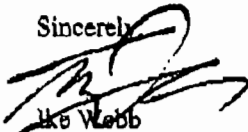
Letter of Reference for Ron Paterson

I have known Ron Paterson for three years. As a coach, as an Executive Board Member of Pop Warner as well as Little League, and as a friend, I feel compelled to serve as a reference to his character.

In the last few years serving as an assistant coach beside Mr. Paterson I have seen first hand the conviction and dedication toward the betterment of youth sports in our community. He has spent countless hours volunteering his time. He had even sponsored some at risk children out of his own pocket to be sure they were able to participate. I witnessed continuous encouragement and emphasis on school and grades.

I attended the Rockfest event in October and was impressed that such an event was able to take place in Lake Havasu. Unfortunately Mr. Paterson has come under fire for his inexperience as a promoter and his intentions have been questioned. I believe his intention and vision for this event was of good character and I hope to see more events of this kind come to our community.

Sincerely,



Mike Webb
General Manager



www.havasupestcontrol.com • E-mail: dragonfly@cltlnk.net

SCANNED



Phone (928) 855-1054
 (800) 858-1859 • Fax (928) 855-3329

2761 Maricopa Ave.
 Lake Havasu City, Arizona 86406

To Whom It May Concern:

I would like to speak of the character of Ron Paterson. Ron Paterson has done business with Havasus Pest Control for several years and has always taken care of his responsibility with our company. I went to the Rock Festival myself and thought it was an outstanding event.

It makes me wonder why the city is involved in Ron Paterson's unpaid debt. It is obvious that his intentions were not to commit fraud, otherwise wouldn't he have simply not paid anyone. It is my understanding, from the local press, that Ron Paterson has paid a large percent of the debts incurred by his event. Is it not the vendors who are stilled owed money responsibility to collect, outside of our local government?

Being a sub contractor in construction I have had a number of contractors, 'run out of money', and it was my responsibility to try and get payment. Is this not the same?

Ron Paterson is not a criminal. He may have made a poor business venture, but not a criminal.

Sincerely,

Suzanne D. Stebila
 Suzanne D. Stebila



www.havasuspestcontrol.com • E-mail: dragonfly@ctlink.net

SCANNED

* MAY-13-2007 12:03

SCFaz

928 505 8111

P.01

May 13, 2007

To Whom It May Concern:

Ron Paterson is a good guy. I have known him and his family for 4 years. His sons are good friends of mine. Ron coached me in football and baseball. I have spent several nights over his house and he is a very nice person. He is a good father.

Sincerely,

Tyler Ellison

Tyler Ellison

May 13, 2007

To Whom It May Concern:

I have known Ron Paterson for 4 years. He is a great father and husband. His family wife and sons are wonderful. His sons are good friends of my son and his boys are good boys. I have been involved with Ron through Little League and Pop Warner, as a dedicated parent, a team mom and a board member. Ron has coached my son in these sports. Ron has served as president on the Little League and Pop Warner sports for a couple of years and did a good job. I helped and worked as a volunteer for the 3 day Rock Fest. I was there around 10 hrs to 12 hrs a day. I really feel the Rock Fest was something great for this city. I would attend and volunteer again.

Sincerely,



Cheryl Kochever

Ron Paterson

From: dragonfly@citlink.net
Sent: Sunday, May 13, 2007 5:24 PM
To: ron@arizonaloanguy.com
Subject: Fwd: Ron Patterson Letter

May 13, 2007

To Whom It May Concern:

I have known Ron Patterson for four years. He is a personal friend and we have both coached children for Pop Warner football and Little League baseball.

Ron has always proven to be generous and dedicated in every endeavor that we have volunteered for. He is a dedicated father and his family is very important to him.

Through my personal business, I have done work for Ron and he was honest and upfront during the entire project. I did not have any problems working with him during this business undertaking.

Sincerely,

Joseph Behmer
2245 Casper Dr.
Lake Havasu City, AZ 86406

5/14/2007

SCANNED

Ron Paterson

From: dragonfly@cillink.net
Sent: Sunday, May 13, 2007 5:25 PM
To: ron@arizonaanguy.com
Subject: Fwd: Ron Patterson Character Letter

May 13, 2007

To Whom It May Concern,

I have known Ron Patterson for over four years. He is a personal friend and our families have gathered together on several occasions. I have also volunteered with Ron on the Executive Boards for Pop Warner football and Little League baseball during the last four seasons.

Ron has always shown to be very honest and generous. He is a dedicated father and there have been several occasions that he has helped out less fortunate children by paying for their registration fees for football when their families could not afford the fee.

Ron has volunteered and donated many man-hours and personal time to these organizations and he always wants what is best for the children. The concern and example of dedication he has shown to these young men is helping to mold them into leaders of our future communities.

Sincerely,

Jennifer Behmer
2245 Casper Dr
Lake Havasu City, AZ 86406

5/14/2007

SCANNED

May 11, 2007

Your Honor,

Please allow me to take the time to offer a personal character reference for Ron Patterson.

In the time I have known Ron; I have been impressed with his dedication to the community. He is a man of integrity, and is extremely dedicated to his family and work.

I would also like to add that Ron was my son's football coach; he taught more than football to the kids, he is a great asset to the community of Lake Havasu City.

Sincerely,

Kimberley Wegner

To Whom It May Concern:

I am writing on behalf of Ron Paterson and BKR Productions. Working with Ron for the Lake Havasu Rock Fest turned out to be a very positive experience. I play drums for Nick Sterling who is a home-town Havasu native. Ron invited us to play the show and gave us a great time slot before one of the headlining bands on the main stage.

I also have my own band Razer. I had asked Nick Sterling's father Jim if it would be ok to ask Ron if my band Razer could play the festival as well. He told me since it was early enough in the year that I might have a chance so I contacted Ron. Ron was gracious enough to accept even though he was inundated running the festival. He not only gave Razer the best possible time-slot he could to someone he doesn't know but he accommodated the band member's women and crew. I can speak on behalf of Razer that everyone was appreciative for a fun trip.

The equipment that BKR Productions provided was completely professional. The stages were nice and big and the sound systems and crew were very professional. The time slots that Ron worked out for me to play in both bands went smooth. I was able to get equipment from one stage to the other with a lot of help from the ground crews. Security and the organization of the festival logistics seemed in tact. I did not experience anything that made me have a negative experience.

I also got to meet and mingle with a famous drummer by the name of Vinnie Appice. He is the drummer for Black Sabbath who was playing in The Hollywood All-Stars at the festival. He's actually one of my biggest idols and influences and if were not for Ron Paterson, having the right mind and enthusiasm to hire artists like Nick Sterling, I would have never met him.

I think that running your first festival is a daunting task to say the least. I believe that the next one would only be better and would have a positive effect on Lake Havasu.

Thank you,

Eric Bongiorno

SCANNED

Ron Paterson

From: Kathy Chalmers [kckc@citlink.net]
Sent: Monday, October 23, 2006 11:17 AM
To: epress@maddog.net
Cc: ron@BKRpromotions.com
Subject: e-press

You should be ashamed of yourself for the report you did on the "Rockfest".
Where are you getting your information?
Nothing that you printed should have been. The ROCKFEST was a GREAT event.
It should make the City of Lake Havasu Proud.
Every time something good comes to town, the media and others find a way to sabotage it,
one way or another. If I were Mr. Paterson, I would find a way to get a restraining order
against you and Murphy Broadcasting. By the way, how many private businesses answer their
phone on a Sunday? How many of your vendors are paid net 30 or even net 60?
You need to get your facts correct, not take the word of one disgruntled customer. And
you wonder why we don't believe half of what we read!

Kathy Chalmers

Ron Paterson

From: Stereo Suite [info@stereosuite.com]
Sent: Wednesday, October 11, 2006 6:47 PM
To: Jeff E Adams; 'Ron Paterson'
Subject: Rockfest 2007??

Hey guys!!

Just wanted to drop a line and say that we had such a great time this weekend playing for you all. Everyone was very accomodating over the weekend and we look forward to doing it again next year (hopefully on the main stage). The hotel was great and so were the people. Let us know if any of you ever have anything else like this going on or any leads in general in regards to playing a show(s). Thanks for everything.

All our best,
Sean, Joe, Travis, and Pharoah of Stereo Suite

PS- Thanks for the backstage passes for Sunday. Also...what was the name of the sound company you used from San Diego. They were working the Anderson Toyota Stage. Thanks again!!

Ron Paterson

From: Havasu Pest Control [dragonfly@citlink.net]
Sent: Friday, May 11, 2007 11:34 AM
To: Zeny Gregorio
Subject: Re: Letter

Thanks Zeny

----- Original Message -----

From: "Zeny Gregorio" <zgregorio212@hotmail.com>
To: <dragonfly@citlink.net>
Sent: Friday, May 11, 2007 12:29 PM
Subject: RE: Letter

>I would like him to come back and volunteer himself as a coach again, it
>was a pleasure to have him last summer. I dont have any problems with him
>being as a coach. It would be a great help if he could.
> Regards,
> Zeny (:
>
>

*Alan Samuelson
3470 Little Chief Dr.
Lake Havasu City, AZ 86406*

May 11, 2007

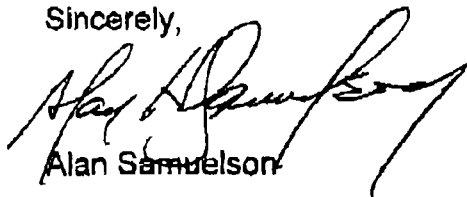
Letter of Reference for Ron Paterson

I met Ron Paterson when a friend asked me if I would like to be involved with the Rockfest. I worked for Mr. Paterson the entire weekend managing the grounds workers and as a type of "go to" guy for the various volunteers and paid workers.

Mr. Paterson was at the event the entire weekend, working with all of us to ensure its success. His enthusiasm and excitement of being able to bring such an event to this community was contagious.

I feel badly about the backlash and accusations that have come forth since the event because I was there and believe that any losses that may have occurred are due to inexperience and not fraud or misrepresentation.

Sincerely,



Alan Samuelson

To whom it may concern:

I am writing on Ron's behalf. Ron has been my baseball coach 5 years. He has also been my football coach 1 year. Ron is a good man. He does get competitive, but who doesn't get competitive once in a while?

Every year that Ron has been my coach I have liked him. He is my favorite coach. His son is also one of my friends. Ron is really cool when you get to know him. He is really fun.

His family is really nice to my family. I know Ron cares. When my grandpa died he took the time to come to his funeral. That shows he has a good heart. Ron is a really great guy.

Sincerely,
Johnny Baker, age 12.

May 11, 2007

To Whom It May Concern,

I am writing this letter on behalf of Mr. Ron Patterson. I have felt compelled to show my support due to his recent change in circumstances. I have known Mr. Patterson for approximately 5 years. I met him when my grandson started playing baseball. Mr. Patterson has coached my grandson every year during the baseball season. He was also his coach for football. I have observed Mr. Patterson over the years as he has proven to be excellent with kids. His whole family has treated my family with the utmost respect and kindness. In all of my dealings with Mr. Patterson he has shown himself to be very honest. Ron has been such a wonderful inspiration to my grandson as he grows older.

When you think of the sports program in Lake Havasu City my first thought is of Ron Patterson. He has invested so much of his time into the Parks and Recreation of Lake Havasu City. This time has been given on a voluntary basis. He has always shown himself to go above and beyond what is necessary of him for the sake of others.

Mr. Patterson tried to make a difference in Lake Havasu City by providing the Rockfest. Lake Havasu City needs Ron Patterson to provide this sort of entertainment and give back to the community. It makes my heart sad to read the paper and see Mr. Patterson portrayed in such a bad light. Thank you for your consideration.

Sincerely,

Joyce, Tina, Tommy,
Jeremy + Theresa
Baker

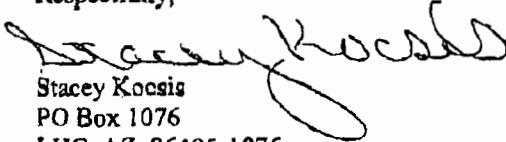
05/11/07

To Whom This Will Concern,

I have had the opportunity to cross paths with Ron Patterson over the past several years and was surprised to have read the paper this week. To my knowledge, Ron has always been motivated towards the positive outcomes, whether it has been from being President of Lake Havasu Little League or Pop Warner.

My son and I even worked the Rook Fest and through out Friday and Saturday's event, I spoke with Ron and his outlook was very positive for not only the event, but the generation of revenue for Lake Havasu itself. How future events would bring crowds of people who may have never came to Lake Havasu and to give our residents the opportunity to attend a mega concert without having to travel to Vegas, Phoenix or California.

Respectfully,



Stacey Kocsis
PO Box 1076
LHC, AZ 86405-1076

IN THE LAKE HAVASU CITY JUSTICE COURT PRECINCT
COUNTY OF MOHAVE, STATE OF ARIZONA

STATE OF ARIZONA,

Plaintiff,

vs.

RONALD JAMES PATERSON,

Defendant.

MAY 22 2007

No. JFR-2007-00383

CRIMINAL COMPLAINT
FELONY

The complainant herein personally appears and, being duly sworn, complains on information and belief against **RONALD JAMES PATERSON**, charging that in **LAKE HAVASU CITY JUSTICE COURT** Precinct, Mohave County, Arizona:

COUNT 1: THEFT, CLASS 5 FELONY

On or about the 14th day of February, 2007, in the vicinity of 800 Park Hill Avenue, Bullhead City, Mohave County, Arizona, said Defendant, RONALD JAMES PATERSON, committed theft of currency belonging to Maurice Trudell, with a value of \$2,000.00 or more, all in violation of A.R.S. §§ 13-1802, 13-1801, 13-701 and 13-801, a Class 5 Felony.

COUNT 2: THEFT, CLASS 5 FELONY

On or about the 28th day of March, 2007, in the vicinity of 800 Park Hill Avenue, Bullhead City, Mohave County, Arizona, said Defendant, RONALD JAMES PATERSON, committed theft of currency belonging to Maurice Trudell, with a value of \$2,000.00 or more, all in violation of A.R.S. §§ 13-1802, 13-1801, 13-701 and 13-801, a Class 5 Felony.

5/21/07
Date

Leroy R. Albright
Complainant
DEPUTY COUNTY ATTORNEY
LEROY R. ALBRIGHT

Subscribed and sworn to before me this 22 day of MAY, 2007.

Clyde Cochess
JUSTICE OF THE PEACE

Physical Description:

RACE: WHI SEX: M DOB: 09/26/1962

HEIGHT: 6' 0" WEIGHT: 225

HAIR: BRN EYES: BLU

LKA: 1801 LOS LAGOS #C LAKE HAVASU CITY, AZ 86403

DR#: LHCPD 2007-003721

AGENCY: LHCPD OFFICER: CHESHIRE 117

Review #: 07-F-1189

VICTIM APPLICABLE: YES
DEFENDANT: IN CUSTODY

**IN THE LAKE HAVASU CITY JUSTICE COURT PRECINCT
COUNTY OF MOHAVE, STATE OF ARIZONA**

STATE OF ARIZONA,

Plaintiff,

vs.

RONALD JAMES PATERSON,

Defendant.

No. JFR-2007-00383

**CRIMINAL COMPLAINT
FELONY**

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5/21/07
Date

Leroy R. Albright
Complainant
DEPUTY COUNTY ATTORNEY
LEROY R. ALBRIGHT

Subscribed and sworn to before me this _____ day of _____, 20____.

JUSTICE OF THE PEACE

Physical Description:

RACE: WHI SEX: M DOB: 09/26/1962
HEIGHT: 6' 0" WEIGHT: 225
HAIR: BRN EYES: BLU
LKA: 1801 LOS LAGOS #C LAKE HAVASU CITY, AZ 86403

DR#: LHCPD 2007-003721
AGENCY: LHCPD OFFICER: CHESHIRE 117
Review #: 07-F-1189

VICTIM APPLICABLE: YES
DEFENDANT: IN CUSTODY

TIMOTHY D. BENNETT

Attorney at Law
5473 Peace River Ct.
Las Vegas, NV 89148
(702) 810-0373/ FAX (702) 953-7360
AZ Bar # 021426
Attorney for the Defendant

**IN THE LAKE HAVASU CITY CONSOLIDATED COURTS
JUSTICE COURT, LAKE HAVASU CITY PRECINCT**

STATE OF ARIZONA

Plaintiff,

vs.

RONALD JAMES PATERSON,

Defendant.

No. JFR 2007-00333

NOTICE OF APPEARANCE

AND

**MOTION TO RECONSIDER
BAIL/RELEASE CONDITIONS**

AND


**MOTION TO APPEAR
TELEPHONICALLY**

(Expedited hearing requested)

TIMOTHY D. BENNETT herewith submits and enters his notice of appearance for the Defendant.

Additionally, by and through undersigned counsel, Defendant respectfully moves this Honorable Court to reconsider the release conditions ordered in this matter, which includes an order of cash bail in the amount of \$100,000. Further, undersigned counsel requests that an expedited hearing be scheduled in this matter and that said counsel be permitted to appear telephonically for the same. These Motions are supported by the following Memorandum of Points and Authorities and various letters from the community, incorporated by reference herein.

RESPECTFULLY SUBMITTED THIS 21ST DAY OF MAY 2007.



Timothy D. Bennett
Attorney for Defendant

MEMORANDUM OF POINTS AND AUTHORITIES

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In the above cause, Mr. Paterson is charged with two counts of theft, each class 5 felonies. Mr. Paterson is also charged with three further counts of felony theft in cause number CR-20070667 before the Mohave County Superior Court, Division 5 (see "Case Detail" attached hereto). It is believed that all five theft counts in both the instant cause and CR-20070667 arise from the same common transaction or event, namely a concert in Lake Havasu City that took place on or about 6 through 9 October 2006. Mr. Paterson is alleged to have promoted the concert and to have entered into various contracts with the alleged victims that have apparently fallen into some dispute. Indeed, at first blush it would seem that these matters have all the appearance of purely *civil* matters. However, it is also clear that this matter has received much press attention, and that the alleged victims are fairly financially prominent in the community.

In cause CR-20070667, Mr. Paterson's appearance was ordered secured by a \$60,000 security bond, which was posted on or about 14 May 2007. It is noteworthy that Mr. Paterson was scheduled to appear in that matter for an arraignment at a later date, for which the Mohave County Attorney's office had apparently arranged further press coverage. However, Mr. Paterson eagerly walked into Division 5 on 14 May 2007 requesting an immediate appearance with the Hon. Robert R. Moon to appear on his initial three theft charges. It was only days later on Friday 18 May 2007 that Mr. Paterson was arrested in the instant cause at an hour too late to secure counsel or otherwise prepare to fully discuss release conditions at the hearing that occurred in this matter on Saturday 19 May 2007. Given the press coverage and the prominence of the alleged victims, it is at this point that the apparent implications for justice in this matter would take a more sinister turn.

1 On Saturday 19 May 2007, during a hearing conducted by video while he was held in
 2 custody, Mr. Paterson's appearance at future proceedings in this matter were initially secured by
 3 a security bond of \$100,000. Shortly after, as if by some second thought, Mr. Paterson was
 4 notified that this appearance would be secured by *cash* bond only, in the same amount. The
 5 explanation for this change of order seems scanty at best. While Mr. Paterson would have been
 6 able to obtain a security bond over the weekend, he is unable to generate that amount in cash,
 7 whether upon short notice at the weekend, or at any other time. As a result, as of this writing, Mr.
 8 Paterson has been wrongfully deprived of his freedom for three days, with no immediate
 9 restoration to freedom in sight. For this reason, an expedited hearing is requested in this matter.
 10

11 The Eighth Amendment to the Constitution of the United States and the Constitution of
 12 the State of Arizona (Art. 2 § 22) in identical language provide that:

13 *Excessive bail shall not be required, nor excessive fines imposed, nor cruel and*
 14 *unusual punishments inflicted (emphasis added).*

15 While the "Bail Clause" of the Eighth Amendment is not seen as directly applicable to
 16 state courts under the 14th Amendment doctrine of "incorporation," it is undisputed that civilized
 17 jurisprudence, as magnified before the entire world by the laws of the United States, demands
 18 that where a criminal defendant's appearance is to be secured by bail, that bail shall not be
 19 excessive (*see Carlson v. Landon*, 342 U.S. 524 (1952)). "Excessive," in this instance is defined
 20 as "bail in a sum more than will be reasonably sufficient to prevent evasion of the law by flight"
 21 (*see Black's Law Dictionary*, 6th Ed.)
 22

23 The Arizona Supreme Court agrees with this analysis, addressing the considerations for
 24 setting reasonable bail in *Gusick v. Boies*, 72 Ariz. 233 (1951). The Court notes that the
 25 determination of the amount of bail must be done in light of the constitutional prohibition against
 26
 27

1 excessive bail (*id.*) and should also take into account:

- 2 1) The nature and gravity of the offense charged
- 3 2) The character and reputation of the accused
- 4 3) His previous criminal record, if any
- 5 4) The measure of punishment which may be inflicted
- 6 5) The ability of the accused to give bail

7 In the foregoing, the Arizona Supreme Court confirmed that in Arizona a defendant must
 8 be presumed innocent in fixing the amount of bail. The sole purpose of bail is to ensure
 9 defendant's attendance when required. Therefore, any bail fixed at more than necessary to secure
 10 a defendant's appearance is held to be excessive, in violation of the Arizona Constitution. If the
 11 bail set prevents the defendant from making bail or punishes the person charged with a crime
 12 before conviction, it is deemed excessive.

13 Mr. Paterson has already posted bail by security bond in the amount of \$60,000 in a
 14 matter apparently arising from the same alleged transaction. It is noteworthy that this \$60,000
 15 bail ordered is for three felony charges in cause number CR-20070667, while the \$100,000
 16 ordered in the instant matter is for two class 5 felony charges. *All five* of these felony charges
 17 seem civil, related to some alleged breach of contract. Neither Mr. Paterson's civil liability nor
 18 criminal culpability have been proven. Because the allegation of commission of the crimes in the
 19 instant case did not occur "when the person charged is already admitted to bail on a separate
 20 felony charge," the provisions of Ariz. Const. Art. 2 § 22(2) do not apply. Mr. Paterson is entitled
 21 to reasonable bail calculated *only* to secure his future appearance.

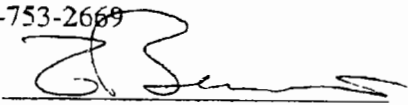
22 That calculation does not amount to much. Mr. Paterson has long-standing business and
 23 family ties to the community. Mr. Paterson's wife lives and works in Lake Havasu City. Mr.
 24 Paterson's other ties are close and proclaim him to be a trustworthy citizen of Mohave County.
 25
 26
 27
 28

1 This is most clearly indicated by the more than 15 letters attached to this Motion. Mr. Paterson
 2 has absolutely no prior criminal record whatsoever. Further, Mr. Paterson has already shown his
 3 reliability in appearing for the above related proceedings by appearing several days *early* and
 4 requesting an immediate audience before Division 5 of the Superior Court. Mr. Paterson is
 5 absolutely no flight risk.

6
 7 Given the foregoing considerations, the only logical reasons *not* to reduce bail
 8 significantly, remove the cash requirement of such bail, or even release Mr. Patterson on his own
 9 recognizance have to do precisely with those considerations prohibited above by the Arizona
 10 Supreme Court: to prevent him from making bail and seemingly, given the publicity and
 11 prominence of the alleged victims involved, to punish. The mere appearance of such impropriety
 12 is sufficient to offend the sensibilities of the laws of the State of Arizona and the jurisprudence of
 13 American law as applied to the rights of those accused and presumed innocent. For these reasons,
 14 this Honorable Court is urged to release Mr. Patterson on his own recognizance or, alternatively
 15 to reduce bail, without cash requirement, to an amount calculated to secure appearance upon his
 16 release. Because of the urgency involved, and the distance necessitated for travel in this matter, it
 17 is further requested that counsel be permitted to appear telephonically in support of this Motion.
 18
 19

20
 21 A copy of the foregoing faxed this 21st day of May 2007 to:

22 Mohave County Attorney
 23 928-753-2669

24 By: 

25
 26
 27
 28

() LAKE HAVASU CITY MUNICIPAL COURT
2001 COLLEGE DRIVE, LAKE HAVASU CITY, AZ. 86403

(X) LAKE HAVASU CITY JUSTICE COURT
(928) 453-0705

STATE OF ARIZONA
vs

CASE NUMBER
JFR 200700333

DETERMINATION OF RELEASE
CONDITIONS AND RELEASE ORDER

PATERSON, Ronald James

JFR 200700333 Theft

DEFENDANT

IT IS ORDERED that Defendant be released, provided that he/she comply with the standard conditions of release and all other conditions checked below.

IT IS ORDERED that the Public Defender IS NOT Appointed for your defense and you must appear as follows:

FURTHER ORDERED Administrative Assessment Fee of \$25.00 IS IS NOT imposed, payable _____.
In addition to any attorney reimbursement costs imposed at a later date for services.

() COUNTY PUBLIC DEFENDER'S OFFICE-- 2001 COLLEGE DR. #142 928-453-0723

Contact your Attorney 928-743-0734 (Kingman)

() CITY PUBLIC DEFENDER, SEE LETTER FOR ATTORNEY INFORMATION

PRE-TRIAL CONFERENCE: _____ at _____ AM/PM

() Address: 2360 McCULLOCH BLVD. (POLICE DEPT. BUILDING) 928-854-4388 - City Prosecutor

() Address: 2001 COLLEGE DRIVESUITE 148.....928-854-3501 - County Attorney

PRE-TRIAL CONFERENCE: _____ at _____ AM/PM With Public Defender

CASE MANAGEMENT CONFERENCE: _____ at _____ AM/PM with
City Prosecutor County Attorney Public Defender (address marked above)

JUDGMENT & SENTENCE or DETERMINATION OF A TRIAL DATE / OMNIBUS HEARING
_____ at _____ AM/PM Address: 2001 COLLEGE DRIVE (Courthouse)

PRELIMINARY HEARING: 5/29/07 at 10:00 AM
Address: 2001 COLLEGE DRIVE (Courthouse)

**WARNING! FAILURE TO APPEAR AS ORDERED MAY RESULT IN CONTEMPT
PROCEEDINGS AND A WARRANT OF ARREST**

IT IS ORDERED that the MOHAVE COUNTY SHERIFF transport the MISDEMEANOR DEFENDANT IF IN CUSTODY to the Lake Havasu Consolidated Court on _____ at 10:00 AM for a Bond Review Hearing in accordance with Rule 7.4(e) of the Criminal Rules of Procedure. (Bond having been posted for release, the Sheriff shall advise the defendant to appear at the Court at the date and time above.)

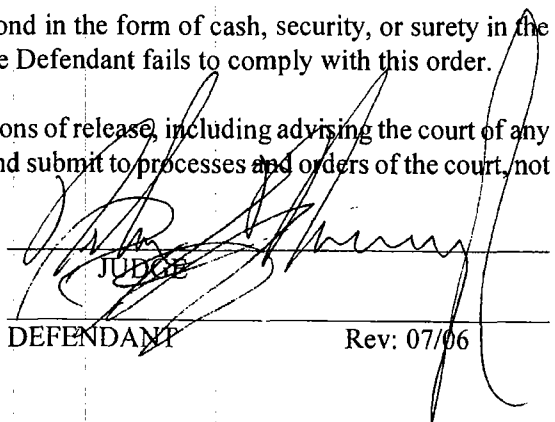
OWN RECOGNIZANCE - The Defendant is hereby ordered released on his/her own recognizance.

APPEARANCE BOND - Defendant will execute an appearance bond in the form of cash, security, or surety in the amount of \$ 100,000.-. The bond will be forfeited in the event the Defendant fails to comply with this order.

CASH ONLY

DEFENDANT MUST COMPLY with each of the following conditions of release, including advising the court of any change of address, not commit any criminal offense, appear to answer and submit to processes and orders of the court, not depart the State without leave of the Court, and:

5/19/07
DATE



JUDGE

DEFENDANT

Rev: 07/06

SCANNED

ARREST REPORT

07-3721

50421

BOOKING NO 50500

ADULT JUVENILE

1 LAST NAME PATERSON	FIRST ROVARD		MIDDLE JAMES	
2 DATE OF BIRTH 9-26-62	3 AGE 44	4 SOCIAL SECURITY NUMBER 568-49-1168	5 ALIAS NAMES	
6 HOME ADDRESS 1801 LOS LAGOS #C LHC AZ		7 HOME PHONE 453-6511	8 DRIVERS LICENSE NO / STATE DC1733490	
9 OCCUPATION/EMPLOYER NAME/NAME OF SCHOOL (IF STUDENT) NONE		10 EMPLOYER ADDRESS/PHONE		11 RESIDENCY 1 LAKE HAVASU 4 CALIFORNIA 2 MOHAVE CO 5 OUT OF STATE 3 ARIZONA 6 TRANSIENT
12 RACE 1 WHITE 4 AMERICAN INDIAN/ 2 BLACK ALASKAN NATIVE 3 HISPANIC 5. ORIENTAL/ASIAN	13 SEX 1 MALE 2 FEMALE	14 HEIGHT 6'00	15 WEIGHT 230	16 HAIR COLOR 1 BALD 4 BROWN 7 RED 9 WHITE 2 BLACK 5 GREY 8 SALT/ 10 OTHER 3 BLOND 6 MIXED PEPPER
17 EYE COLOR 1 BLACK 4 GRAY 2 BLUE 5 GREEN 3 BROWN 6 HAZEL	18 GLASSES 1 YES 2 NO	19 HAIR LENGTH 1 BALD 4 SHORT 2 LONG 5 THIN 3 MEDIUM	20 HAIR STYLE 1 AFRO 4 CREW CUT 7 TAIL 2 BALD 5 MOHAWK 8 WAVY/CURLY 3 BALD ON TOP 6 STRAIGHT 9 OTHER	
21 FACIAL HAIR 1 BEARD/GOATEE 4 GOATEE ONLY 7 STUBBLE 2 BEARD/MUSTACHE 5 MUSTACHE ONLY 8 NO FACIAL 3 BEARD ONLY 6 SIDEBURNS HAIR	22 COMPLEXION 1 ACNE 4 FAIR 2 ALBINO 5 MEDIUM 3 DARK	23 BUILD 1 AVERAGE 4 MUSCULAR 7 THIN 2 LARGE 5 OBESE 3 MEDIUM 6 SMALL	26 U.S. CITIZENSHIP (IF NO, WHERE) 1 YES 2 NO	
24 TEETH 1 BRACES 4 FALSE 7 MISSING 2 BROKEN 5 GOLD 8 NORMAL 3 CROOKED 6 IRREGULAR 9 SILVER	25 SPEECH/VOICE 1 ACCENT/ FOREIGN 3 GRUFF 6 NORMAL 2 CONFUSED 5 MUTE 8 OTHER	27 DESCRIBE ANY SCARS/BODY MARKS OR DISFIGUREMENTS/TATTOOS/BODY PIERCINGS, ETC		28 CAUTION/HAZARD 1 CARRIES FIREARMS 4 VIOLENT 2 CARRIES KNIVES NATURE 3 KNOWN FELON
29 ADDITIONAL DESCRIPTION (CLOTHING, ETC)				
30 BIRTHPLACE CA	31 VICTIM NOTIFIED OF APPEARANCE?	32 APPEARANCE DATE/TIME	33 OFFICER NAME AND NUMBER	
1 DATE OF ARREST 5-18-07	2 TIME OF ARREST 1445	3 LOCATION OF OFFENSE LAKE HAVASU CITY		
4 LOCATION OF ARREST 1801 LOS LAGOS #C LHC AZ	5 ALCOHOL INFLUENCE? 1 YES 2 NO	6 DRUG INFLUENCE? 1 YES 2 NO	7 ALCOHOL TEST? 1 YES 2 NO	8 BAC %
9 ARRESTING OFFICER NAME AND NUMBER CHESHIRE 117	10 ASSISTING OFFICER NAME AND NUMBER IRVINE 177	11 SUPERVISOR APPROVING ARREST		
1 CODE 13-1802	2 COMPLAINT/WARRANT Long Form	3 COURT Home	4 CODE 13-1802	5 COMPLAINT/WARRANT Long Form
7 WRITTEN DESCRIPTION OF CHARGE Theft		8 M/F F	9 WRITTEN DESCRIPTION OF CHARGE Theft	
11 CODE	12 COMPLAINT/WARRANT	13 COURT	14 CODE	15 COMPLAINT/WARRANT
17 WRITTEN DESCRIPTION OF CHARGE		18 M/F	19 WRITTEN DESCRIPTION OF CHARGE	
1 RELATIONSHIP TO VICTIM	2 BROTHER/SISTER	8 EX-SPOUSE	15 PARENT	18 STEPPARENT
4 CHILD	5 CO-HABITANT	11 GRANDPARENT	16 SPOUSE	17 STEPCHILD
2 ARREST MADE 1 AT SCENE 2 RESULT OF FOLLOW UP	3 CHILDREN PRESENT? 1 YES 2 NO	4 ALCOHOL INVOLVED? 1 YES 2 NO	5 DRUGS INVOLVED? 1 YES 2 NO	6 WEAPON SEIZED? 1 YES 2 NO
1 DRUG ACTIVITY (MULT. CHOICE)	1 BUY 4 MANUF/CULTIVATE 7 SMUGGLE 10 OTHER 2 DELIVER 5 POSSESS 8 TRAFFIC 3 DISPENSE 6 SELL 9 USE	2 QUAN	3 UNITS (MULT. CHOICE)	1 GRAM 4 OUNCE 7 LITER 2 MILLIGRAM 5 POUND 8 MILLILITER 3 KILOGRAM 6 TON 9 DOSE
4 DRUG TYPE (MULT. CHOICE)	1 BARBITUATES 4 HASHISH 7 MARIJUANA 10 PRESCRIPTION 13 UNKNOWN 2 COCAINE 5 HEROIN 8 METHAMPHETAMINE 11 SYNTHETIC 3 HALLUCINOGEN 6 LSD/ACID 9 OPIUM 12 OTHER			
1 DATE BOOKED 5-18-07	2 TIME BOOKED 1515	3 SEARCHED BY 117	4 JAILOR C12L	5 LIST ANY SPECIAL NEEDS
6 HOW RELEASED	1 BOND POSTED 3 CHARGES DROPPED 6 PENDING LONG FORM COMPLAINT 9 TRANSFERRED TO CRRYS 12 TURNED OVER TO BORDER PATROL	2 BOOKED, CITED AND RELEASED 4 CITED AND RELEASED 7 REFERRED TO JUV. PROBATION 10 TRANSFERRED TO JUVENILE DETENTION	3 ORDERED BY JUDGE 8 TRANSFERRED TO COUNTY JAIL 11 TURNED OVER TO ANOTHER AGENCY 13 OTHER	
7 RELEASED TO LAST NAME FIRST MIDDLE			8 DATE OF BIRTH	
9 ADDRESS/CITY/STATE/ZIP				10 PHONE
11 RELATIONSHIP TO ARRESTEE	2 BROTHER/SISTER	5 CO-HABITANT	8 EX-SPOUSE	11 GRANDPARENT 16 SPOUSE 23 OTHER
3 BOYFRIEND/GIRLFRIEND	4 CHILD	6 EMPLOYEE	7 EMPLOYER	9 FRIEND 10 GRANDCHILD 12 IN-LAW 13 UNKNOWN 14 OTHER 15 PARENT 17 STEPCHILD 18 STEPPARENT
12 RELEASED BY				13 RELEASED DATE/TIME

SCANNED

BULLHEAD CITY JUSTICE
BULLHEAD CITY MUNICIPAL
MOHAVE COUNTY SUPERIOR

KINGMAN/CERBAT JUSTICE
KINGMAN MUNICIPAL
MOCCASIN JUSTICE

LAKE HAVASU CITY JUSTICE
LAKE HAVASU CITY MUNICIPAL

STATE OF ARIZONA

vs
Ronald PATERSON

DEFENDANT

CASE NO.

07-3721

BOOKING NO:

RELEASE QUESTIONNAIRE
PART I

INFORMATION TO BE SUPPLIED BY LAW ENFORCEMENT OFFICER

GENERAL	1. CHARGE(S) AGAINST DEFENDANT: <u>Theft v2 Counts C.4 Fel</u>
	2. MAXIMUM PENALTY FOR THE CHARGE(S): _____
	3. DEFENDANT IS HERE PURSUANT TO <input checked="" type="checkbox"/> AN ARREST <input type="checkbox"/> A SUMMONS.
	4. IF DEFENDANT WAS ARRESTED, TELL WHEN AND WHERE TAKEN INTO CUSTODY: <u>1801 Los Lagos Unit C Lake Havasu City, AZ.</u>
	5. LIST ANY OTHER CHARGES OUSTANDING AGAINST DEFENDANT: <u>—</u>
OFFENSE	6. TIME AND PLACE OF OFFENSE: <u>2-14-07 & 3-28-07</u>
	7. WAS DEFENDANT ARMED AT THE TIME OF OFFENSE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, DESCRIBE WEAPON: _____
	8. WAS PROPERTY TAKEN OR DESTROYED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, HAS IT BEEN RECOVERED? <input type="checkbox"/> YES <input type="checkbox"/> NO
ARREST	9. WAS ANYONE INJURED OR THREATENED WITH PERSONAL INJURY BY DEFENDANT DURING THE COURSE OF THE OFFENSE OR SUBSEQUENT THERETO? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, LIST THE EXTENT AND NATURE OF ANY INJURIES _____
	10. DID DEFENDANT ATTEMPT TO AVOID OR RESIST? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	11. WAS DEFENDANT ARMED AT THE TIME OF ARREST? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	12. WAS EVIDENCE OF THE OFFENSE FOUND IN DEFENDANT'S POSSESSION? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
OTHER	13. HAS THE DEFENDANT ADMITTED INVOLVEMENT IN THE OFFENSE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	14. HAS THE DEFENDANT MADE ANY THREATS AGAINST POTENTIAL WITNESSES OR OTHER PARTIES? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YES, EXPLAIN: _____
	15. IS THERE ANY INDICATION THAT DEFENDANT IS <input type="checkbox"/> AN ALCOHOLIC, <input type="checkbox"/> AN ADDICT, <input type="checkbox"/> MENTALLY DISTURBED OR <input type="checkbox"/> PHYSICALLY ILL? IF YES, PLEASE EXPLAIN: _____
VICTIM	16. PROVIDE INFORMATION WHICH INDICATES DEFENDANT MAY FLEE IF RELEASED. _____ BASED ON THE INFORMATION AVAILABLE, DOES THE STATE OPPOSE AN UNSECURED RELEASE AT THIS TIME? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
	17. VICTIM'S NAME <u>Trudell Trucking</u>
	18. HAS VICTIM BEEN NOTIFIED OF THE DEFENDANT'S INITIAL APPEARANCE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF NOT, WHAT EFFORTS HAVE BEEN MADE TO NOTIFY THE VICTIM? _____
	19. STATE ANY RELEVANT INFORMATION THE VICTIM WANTS THE COURT TO CONSIDER. <u>See Attached</u>
DATED: <u>5.18.07</u> SIGNATURE: <u>S CHESHIRE</u> AGENCY: <u>LHC P.D.</u>	

NOTE: PART III MUST ALSO BE COMPLETED BY LAW ENFORCEMENT

STATE OF ARIZONA

VS. Ronald
PATERSON
DEFENDANT

CASE NO.

07 - 3721
BOOKING NO:

RELEASE QUESTIONNAIRE
PART III

INFORMATION TO BE SUPPLIED BY LAW ENFORCEMENT OFFICER

20. IF DEFENDANT ARRESTED WITHOUT A WARRANT, SPECIFY PROBABLE CAUSE FOR DEFENDANT'S

ARREST: ON 2-14-07 AND 3-28-07 RONALD PATERSON ACCEPTED CHECKS/PAYMENTS
FROM MAURICE TRUDELL FOR EQUIPMENT RENTALS. PATERSON ACTED AS A BROKERAGE
FOR EQUIPMENT RENTAL COMPANIES USING ONE OF HIS FINANCE COMPANIES.
ON 2-14-07 PATERSON ACCEPTED AND CASHED A CHECK IN THE AMOUNT OF \$2054.30
ON 3-28-07 PATERSON ACCEPTED AND CASHED A CHECK IN THE AMOUNT OF \$2500.00
TRUDELL NEVER RECEIVED THE EQUIPMENT.
ON 5-18-07 PATERSON WAS LOCATED AND ARRESTED FOR THESE OFFENSES.
PATERSON DENIED INVOLVEMENT

PROBABLE CAUSE

21. HAS THE PERSON ENTERED OR REMAINED IN THE UNITED STATES ILLEGALLY? YES NO

IF YES, PROBABLE CAUSE IS ESTABLISHED FOR THE FOLLOWING REASONS:

(Explain in detail e.g., admission of the person, statements of co-defendants at the time of arrest, verification of illegal presence, information provided at the issuance of a warrant in conjunction with a direct complaint or grand jury proceeding establishing illegal presence.)

1 SID NUMBER


ARIZONA DEPARTMENT OF PUBLIC SAFETY
DISPOSITION REPORT

Mail to: Criminal History Records
AZ Department of Public Safety
P O Box 18450
Phoenix, AZ 85005-8450

2 NAME (Last, First, Middle) PATERSON, RONALD JAMES		4 DATE OF BIRTH (CCYYMMDD) 19620926		6 DATE OF ARREST (CCYYMMDD) 20070518		8 PCN 9801022121											
3 ARRESTING AGENCY ORI AZ0080400		5 ARRESTING AGENCY CASE NO LHC073721		7 BOOKING AGENCY ORI AZ0080400		9 BOOKING NUMBER LHCA50421											
10 CHARGES / AMENDED CHARGES CHARGES - Please write literal, if more than three (3) charges list on second (2 nd) form LAW ENFORCEMENT AGENCY Fill in original charge(s) on line(s) 1a, 2a, etc PROSECUTOR / COURT Fill in amended charge(s) on line(s) 1b, 2b, etc		11 ARIZONA REVISED STATE OR ORDINANCE	12 DATE OF OFFENSE / VIOLATION	13 OFFENSE TYPE	14 PREPARATORY OFFENSE	15 DOMESTIC VIOLENCE & VICTIM INFO	16 DESIGNATED COURT NAME / IDENTIFIER	17 AMENDED TO (X)	18 DISPOSITION CODE	19 PRISON OR JAIL	20 LENGTH OF CONFINEMENT (da, mo, yr)	21 SENTENCE CODE	22 PROBATION LENGTH (da, mo, yr)	23 FINE YES OR NO	24 COURT CASE / COMPLAINT NUMBER	25 DISPOSITION DATE	26 AGENCY ORI MAKING DISPOSITION DECISION
THEFT 1a 13-1802			20070518	F		D	AZ008033J		P J				Y N				
1b									P J				Y N				
THEFT 2a 13-1802			20070518	F		D	AZ008033J		P J				Y N				
2b									P J				Y N				
3a									P J				Y N				
3b									P J				Y N				

27 FURTHER EXPLANATIONS OR MODIFICATIONS

28 RIGHT INDEX FINGERPRINT

14 PREPARATORY OFFENSE CODES A - Attempted C - Conspiracy to commit F - Facilitate S - Solicit		15 DOMESTIC VIOLENCE OR VICTIM INFORMATION CODES D - Crime involves domestic violence M - Victim is a minor A - Victim is a vulnerable adult L - Victim is a law enforcement officer C - Dangerous comes against children		16 DISPOSITION CODES AC - Acquitted / Not guilty CD - Court Dismissed DP - Deferred Prosecution DS - Deferred Sentencing GG - Guilty NI - Guilty but insane NF - No complaint filed NP - Nolo Contendere plea NR - Not referred for Prosecution PD - Pardon PM - Pending due to mental incompetency PO - Plea to other charges RI - Not responsible by reason of insanity		17 APPELLATE CODE AF - Affirmed AR - Affirmed Remanded for Re-sentencing and RR - Reversed and Remanded RV - Reversed and Overturned SM - Sentence Modified		18 SENTENCE CODES CC - Concurrent CS - Consecutive PS - Public or Community Service SS - Court Suspended Sentence	
DISPOSITION REPORT A Disposition Report is Required from the disposition Agency (arrest, prosecutor or court) pursuant to AZ Rules of Criminal Procedure (Rule 37) for each person fingerprinted for a reportable crime pursuant to A.R.S. 41-1750		Please call DPS Criminal History Records (602) 223-2222 for assistance with this form		DPS 802-03757-F rev 02/2002		Right Index			

SCANNED

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FILED

BY: LO

2007 NOV -9 AM 10: 04

VIRLYNN TINNELL
SUPERIOR COURT CLERK

1 **TIMOTHY D. BENNETT**
Attorney at Law
2 5473 Peace River Ct
Las Vegas, NV 89148
3 (702) 810-0373/ FAX (702) 953-7360
AZ Bar # 021426
4 Attorney for the Defendant

5 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
6 **IN AND FOR THE COUNTY OF MOHAVE**

7 **STATE OF ARIZONA**

No. CR 2007-0789

Plaintiff,

MOTION TO WITHDRAW

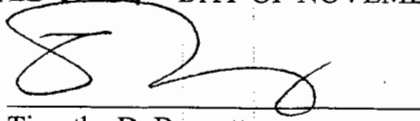
8 vs.

9 **RONALD JAMES PATERSON,**

Defendant.

11 Counsel for the Defendant herewith moves this Honorable Court to permit his withdrawal
12 as counsel of record for professional reasons. Defendant has been notified in writing of this
13 motion.

14 RESPECTFULLY SUBMITTED THIS 9TH DAY OF NOVEMBER 2007.



15
16 Timothy D. Bennett
Attorney for Defendant

17
18 A copy of the foregoing mailed this 9TH DAY OF NOVEMBER 2007 to:

19 Mohave County Attorney
20 P.O. Box 7000
Kingman, Arizona 86402
21 Attorney for the State

22 Law Offices of the Mohave County Public Defender
23 P.O. Box 7000
Kingman, Arizona 86402
24 Courtesy Copy

25 By: 

26
27
28 SCANNED

Dana P. Hlavac
Bar Number 016950
Mohave County Public Defender
318 N. Fifth Street
PO Box 7000
Kingman, AZ 86402-7000
Telephone: 928 / 753-0734
Attorney for Defendant

FILED mh
BY: _____

2008 JAN 11 PM 3:15

VIRLYNN TINNELL
SUPERIOR COURT CLERK

IN THE SUPERIOR COURT, DIVISION V, OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,

Plaintiff,

v.

RONALD JAMES PATERSON,

Defendant.

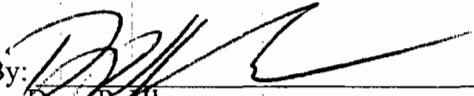
CASE NO.: CR-2007-0789

NOTICE AND ORDER
OF ASSIGNMENT

The Mohave County Public Defender's Office pursuant to Mohave County Superior Court, Local Rule CR-3(B), hereby notifies the Court that the Mohave County Public Defender's Office has assigned the above-entitled matter to Randolph D. Wolfson to represent the Defendant, RONALD JAMES PATERSON, in all further proceedings before this Court.

DATED THIS 10TH DAY OF JANUARY, 2008.

DANA P. HLAVAC
MOHAVE COUNTY PUBLIC DEFENDER

By: 
Dana P. Hlavac
Public Defender

IT IS HEREBY ORDERED that Randolph D. Wolfson shall represent the Defendant, RONALD JAMES PATERSON, in all further proceedings before this Court.

DATED THIS _____ DAY OF JANUARY, 2008.

By: _____
ROBERT MOON
Superior Court, Division V

A copy of the foregoing sent
or hand delivered this date to:

Jeremy L. Huss, Deputy
Mohave County Attorney's Office

Randolph D. Wolfson
3890 Frontage Rd.
Bullhead City, AZ 86442

BY _____

SCANNED

Dana P. Hlavac
Bar Number 016950
Mohave County Public Defender
318 N. Fifth Street
PO Box 7000
Kingman, AZ 86402-7000
Telephone: 928 / 753-0734
Attorney for Defendant

Clerk

FILED *mh*

BY: _____

2008 JAN 11 PM 3:15

VIRLYNN TINNELL
SUPERIOR COURT CLERK

IN THE SUPERIOR COURT, DIVISION V, OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,

Plaintiff,

v.

RONALD JAMES PATERSON,

Defendant.

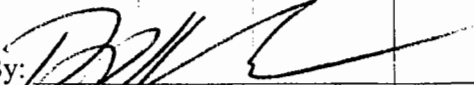
CASE NO.: CR-2007-0789

**NOTICE AND ORDER
OF ASSIGNMENT**

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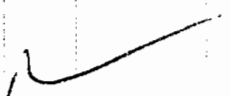
DATED THIS 10TH DAY OF JANUARY, 2008.

DANA P. HLAVAC
MOHAVE COUNTY PUBLIC DEFENDER

By: 
Dana P. Hlavac
Public Defender


IT IS HEREBY ORDERED that Randolph D. Wolfson shall represent the Defendant, RONALD JAMES PATERSON, in all further proceedings before this Court.

DATED THIS 17th DAY OF JANUARY, 2008.

By: 
ROBERT MOON
Superior Court, Division V

A copy of the foregoing sent or hand delivered this date to:

Jeremy L. Huss, Deputy
Mohave County Attorney's Office

BY: 

Randolph D. Wolfson
3890 Frontage Rd.
Bullhead City, AZ 86442

SCANNED

PSO

1/17/08
sd
1/17/08

IN THE SUPERIOR COURT
MOHAVE COUNTY, STATE OF ARIZONA

STATE OF ARIZONA)
Plaintiff,)
vs.)
RONALD PATERSON,)
Defendant.)

Cause No. CR-2007-0789
JOINT OMNIBUS FORM
[Before Hon. Robert Moon]

The state of Arizona and the Defendant in this action, by their attorneys, if any, hereby certify that they have conferred concerning the issues involved in this matter and report to the court as follows:

I. DISCOVERY

A. Defendant hereby certifies:

That he has no objections to the manner or completeness of the State's Rule 15 Disclosures at this time.

- That he objects to the manner or completeness of the following disclosures:
- 1. Names, addresses, and statements of witnesses,
 - 2. Written or oral statements of the defendant or a co-defendant,
 - 3. The circumstances surrounding the acquisition of statements from the defendant,
 - 4. Names, addresses, results and statements of experts,
 - 5. List of items of tangible evidence,
 - 6. Production of specific items upon request, to wit:
COPY OF PROBABLE CAUSE AFFIDAVIT FOR SEARCH WARRANT.
 - 7. List of defendant's known prior felony convictions,
 - 8. Known prior felony convictions of specified persons, to wit: _____
 - 9. Use by prosecutor of prior acts for proof of knowledge or intent,
 - 10. Brady materials,
 - 11. The existence, procedure used to obtain, and results of electronic surveillance,
 - 12. The existence, procedure used to obtain, and results of identifications of the defendant, in person, by photograph or by composite,
 - 13. The existence, procedure used to obtain, and results of all searches and seizures pertaining to the case, including warrants, supporting affidavits and other records of proceedings before a magistrate,
 - 14. The existence, identity, and information provided by an informant.
 - 15. Other: _____

That defense requests additional disclosures under the court's discretionary authority as follows:

Deposition, material, or information requested: **INTERVIEWS WITH**

FILED

**EACH CIVILIAN AND EACH LAW ENFORCEMENT OFFICER
REFEREED TO IN THE STATE'S RULE 15 DISCLOSURE**
Reasons for request: **TRIAL PREPARATION**

B. The state of Arizona hereby certifies:

- That it has no objections to the manner or completeness of the defendant's disclosures under Rule 15.
- That it objects to the manner or completeness of the following disclosures:
 - 1. Appearance by the defendant for the taking of physical evidence,
 - 2. Notice of defenses as to which the defendant will introduce evidence: Alibi, insanity, self-defense, entrapment, consent, impotency, marriage, invalidity of prior conviction, good character, lack of specific intent due to _____, mistaken identification, other _____
 - 3. Names, addresses and statements of defense witnesses,
 - 4. List of items of tangible evidence,
 - 5. Production of specific items upon request, to wit: _____
 - 6. Names, addresses, results and statements of experts.
- That it requests additional disclosures under the court's discretionary authority, as follows: _____
Deposition, material, or information requested: _____
Reasons for request: _____

II. ISSUES WHICH WILL BE RAISED IN THE CASE

The parties hereby notify the court and each other of their intention to raise the following issues in this case: [Check motions which will be made in box of party which will make the motion; if uncontested, check both boxes.]

π Δ
State Defendant

- | | | |
|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | 1. To challenge the jurisdiction of the court. |
| <input type="checkbox"/> | <input type="checkbox"/> | 2. To dismiss an information or indictment under Rule 16.7 on the grounds that: |
| <input type="checkbox"/> | <input type="checkbox"/> | 3. To review the determination of probable cause under Rule 5.5/Rule 12.9. |
| <input type="checkbox"/> | <input type="checkbox"/> | 4. To disqualify a judge under Rule 10.1/Rule 10.2. |
| <input type="checkbox"/> | <input type="checkbox"/> | 5. To change the place of trial under Rule 10.3. |
| <input type="checkbox"/> | <input type="checkbox"/> | 6. To withdraw as counsel under Rule 6.3. |
| <input type="checkbox"/> | <input type="checkbox"/> | 7. To request a determination of defendant's competency/sanity, under Rule 11. |
| <input type="checkbox"/> | <input type="checkbox"/> | 8. To request a determination of defendant's sanity under Rule 11. |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 9. To amend an information or indictment under Rule 13.5. |
| <input type="checkbox"/> | <input type="checkbox"/> | 10. To sever defendants or counts under Rule 13.4. |
| <input type="checkbox"/> | <input type="checkbox"/> | 11. To consolidate defendants or counts under Rule 13.3(c). |
| <input type="checkbox"/> | <input type="checkbox"/> | 12. To determine the voluntariness of a statement made by the defendant. |
| <input type="checkbox"/> | <input type="checkbox"/> | 13. To suppress evidence based on unlawfulness of an arrest. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 14. To suppress evidence based on unlawfulness of a search or seizure. |
| <input type="checkbox"/> | <input type="checkbox"/> | 15. To suppress evidence based on unlawfulness of an identification. |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | 16. To determine the admissibility of evidence (motion <i>in limine</i>), to wit:
Possible AZ. Rules of Evidence 403, 404 and 609 objections. |
| <input type="checkbox"/> | <input type="checkbox"/> | 17. To modify the conditions of release. |
| <input type="checkbox"/> | <input type="checkbox"/> | 18. To request subpoena of an out-of-state witness. |
| <input type="checkbox"/> | <input type="checkbox"/> | 19. To require a material witness to enter into an undertaking under |

Ariz.Rev.Stat. Ann. §13-1841 and 1842.

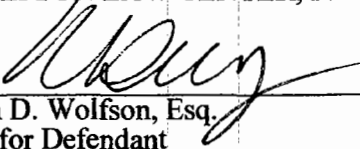
20. Other, specified on Attachment _____

All parties hereby certify that they have reviewed the entire omnibus hearing form and know of no motion or issue specified in the form which they desire to raise at any time during this case other than those noted. Counsel for the defendant hereby certifies that he knows of no problems concerning the securing of evidence, including statements or confessions of the defendant, identifications of the defendant, and results of a search and seizure, electronic surveillance, or arrest, or any other constitutional issues raisable by any of the motions specified in this form, other than those included in the motions noted herein.

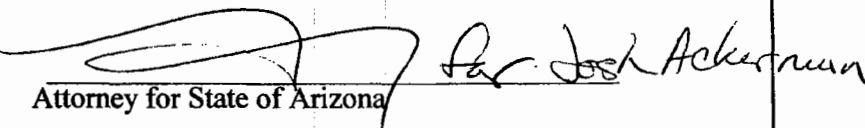
Respectfully submitted,

THE WOLFSON LAW CENTER, P.C.

Date ~~March 6, 2008~~ APR 25

By: 
Randolph D. Wolfson, Esq.
Attorney for Defendant

Date ~~March 6, 2008~~ APR 25
May 23


Attorney for State of Arizona

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

**HONORABLE ROBERT R. MOON
DIVISION: 5
DATE: 05/23/2008
TIME: 10:55 A.M.**

**VIRLYNN TINNELL, CLERK
(sbl) JOETTE ENGAN, DEPUTY CLERK
LINDA CANTRELL, COURT REPORTER**

OMNIBUS HEARING

**STATE OF ARIZONA
Plaintiff,**

vs.

**RONALD JAMES PATERSON,
Defendant.**

CR-2007-0789

APPEARANCES: Megan McCoy, Deputy County Attorney; Randolph D. Wolfson, Attorney for the Defendant.

This is the time set for Omnibus Hearing; the Defendant's presence was waived for this hearing. The Court is presented with the Omnibus Hearing Form; discussion ensues as to the issues set forth therein.

IT IS FURTHER ORDERED setting a Status Hearing on **Wednesday, June 25, 2008 at 4:00 p.m.**; the Defendant will be permitted to waive his presence at that hearing.

IT IS ORDERED affirming prior release orders.

The Court recesses at 11:01 a.m.

cc:
MOHAVE COUNTY ATTORNEY

RANDOLPH D. WOLFSON
Attorney for Defendant

HONORABLE ROBERT R. MOON
Division 5

1 Jonathan L. Warshaw
Attorney No.020724
2 LAW OFFICE OF JONATHAN L. WARSHAW, PLLC
67 South Higley Road, Suite 103-1
3 Gilbert, Arizona 85296
Telephone: 480-390-2537
4 Facsimile: 480-626-5100
E-Mail: WarshawLaw@cox.net
5 Attorney for Defendant

FILED
BY DR

2010 FEB -4 PM 4:10

VIRLYNN TINNELL
SUPERIOR COURT CLERK

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

10
11 STATE OF ARIZONA,) No.: CR2007-0789
12 Plaintiff,) **MOTION TO WITHDRAW**
13 vs.) **AS COUNSEL**
14 RONALD PATERSON,)
15 Defendant.)

16
17 COMES NOW the Defendant, by and through counsel undersigned and hereby
18 moves to withdraw as attorney of record in the above matter.

19 Counsel was hired to represent Mr. Paterson in the case involving all counts related
20 to the event, "Rockfest." Counsel was advised that the listed case numbers provided
21 involved only the Rockfest event. Counsel entered a Stipulation for Substitution of
22 counsel with the understanding that all listed case numbers related to the Rockfest event.
23 All discovery received by counsel from previous counsel was related to the Rockfest event
24 only.

25 In December 2009 during a discussion with the Deputy County Attorney assigned
26 to this case, counsel was informed that Mr. Paterson was in fact charged with a second
27 case unrelated to the Rockfest event. To date counsel has not been retained in this matter.
28 This matter is not set to trial and therefore counsel requests to be withdrawn as attorney of



1 record. Mr. Paterson was informed that counsel is moving to withdraw as attorney of
2 record in this matter only and a copy of this motion has been mailed to his attention.

3
4 RESPECTFULLY SUBMITTED this 2nd day of February, 2010

5
6 **LAW OFFICE OF JONATHAN L. WARSHAW**


7
8 

9 Jonathan L. Warshaw
10 Attorney for Defendant

11 COPIES/ORIGINALS of the foregoing
12 were faxed/mailed/hand-delivered this
2nd day of February, 2010 to:

13 Clerk of the Court
14 Mohave County Superior Court
15 P.O. Box 7000
16 Kingman, AZ 86402

17 Jeremy Huss
18 Mohave County Attorney's Office
19 P.O. Box 7000
20 Kingman, AZ 86402

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FILED
TIME 9:33 AM
FEB 10 2010
VIRLYNN TINNELL
CLERK SUPERIOR COURT
BY: [Signature] DEPUTY

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MOHAVE

HONORABLE RICK A. WILLIAMS, JUDGE
DIVISION V
DATE: FEBRUARY 10, 2010

*wap

ORDER

STATE OF ARIZONA,

Plaintiff,

vs.

RONALD JAMES PATERSON,

Defendant.

NO. CR-2007-789

IT IS ORDERED amending the Minutes from the Status Conference held Friday, February 5, 2010 to reflect the court expressed concerns regarding the “technical deficiencies”, not the “technical difficulties” with Mr. Warshaw’s Motion to Withdraw as Counsel for the defendant.

cc:

Jeremy Huss
Deputy County Attorney**

Jonathan Warshaw**
Counsel for Defendant

Honorable Rick A. Williams
Division V



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BY: JK

2010 FEB 24 PM 3:44

VERLYNN TINNELL
SUPERIOR COURT CLERK

1 CARLENE H. LACY
Acting Mohave County Public Defender
2 JASON R STEFFEN
Deputy Public Defender
State Bar No. 025776
3 Attorney for Defendant
318 N. Fifth Street
4 PO Box 7000
Kingman, AZ 86401
Telephone: (928) 753-0734
5 Fax No: (928) 753-0793

6 **IN THE SUPERIOR COURT, DIVISION V, OF THE STATE OF ARIZONA**
7 **IN AND FOR THE COUNTY OF MOHAVE**

8 STATE OF ARIZONA,
9 Plaintiff,
10 vs.

Case No. CR-2007-0789

NOTICE OF APPEARANCE

11 RONALD JAMES PATERSON,
12 Defendant.

13 Pursuant to 17A A.R.S. Rules of Criminal Procedure, Rule 6.3, the hereby enters its
14 appearance on behalf of the Defendant, RONALD JAMES PATERSON.

15 DATED THIS 24 day of February 2010.

CARLENE H. LACY

17
18 
By: JASON R STEFFEN

19
20 A copy of the foregoing sent
this 24 day of February 2010 to:

21 Jeremy L. Huss, Deputy
Mohave County Attorney's Office

Honorable Rick A Williams

22 By: [Signature]
23



clerk
V

FILED

BY: JL

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MYRLYNN TINNELL
SUPERIOR COURT CLERK

1 CARLENE H. LACY
Acting Mohave County Public Defender
2 JASON R STEFFEN
Deputy Public Defender
State Bar No. 025776
3 Attorney for Defendant
318 N. Fifth Street
4 PO Box 7000
Kingman, AZ 86401
Telephone: (928) 753-0734
5 Fax No: (928) 753-0793

6 **IN THE SUPERIOR COURT, DIVISION V, OF THE STATE OF ARIZONA**
7 **IN AND FOR THE COUNTY OF MOHAVE**

9 STATE OF ARIZONA,

Plaintiff,

10 vs.

11 RONALD JAMES PATERSON,

12 Defendant.

Case No. CR-2007-0789

**DEFENDANT'S RULE 15.2
DISCLOSURE AND REQUEST
FOR RULE 15.1(h) DISCLOSURE**

13 COMES NOW the Defendant, RONALD JAMES PATERSON, by and through
14 the , counsel undersigned, and pursuant to Rule 15.2(b) of the Arizona Rules of Criminal
15 Procedure, hereby gives notice that the defenses below may be raised at trial:

16 General Denial.

17 In support of the above defense(s), the Defendant may call the following
18 witnesses:

- 19 1. The Defendant;
20 2. Any and all individuals named or referred to in the departmental report and
21 preliminary hearing transcript, the grand jury transcript, or police departmental
22 reports as provided by the State.
23 3. Additional Persons who may be called as witnesses at trial, including their names,
addresses, and all statements made by them in connection with the case, and each



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defense that their testimony may support are as follows: **will be supplemented and provided as identified through additional investigation and case preparation.**

4. Pursuant to Rule 15.2 (c)(3), the following tangible documents /objects may be used at trial: any and all physical, or documentary evidence referred to in the departmental report and preliminary hearing transcript, the grand jury transcript, or police departmental reports as provided by the State and such supplemental evidence as may be developed through investigation and case preparation. Such material will be disclosed upon its' identification and determination of use for trial.
5. Pursuant to Rule 15.1(d)(3) and Rule 15.1(h), Arizona Rules of Criminal Procedure, the Defendant hereby requests disclosure of the names and addresses, together with their written or recorded statements of all persons whom the State will call as rebuttal witnesses, together with a list of prior convictions of **all** disclosed witnesses that may be used for impeachment purposes.

DATED THIS 24TH DAY OF FEBRUARY, 2010.

CARLENE H. LACY


By: JASON R STEFFEN

A copy of the foregoing sent this 24 day of February 2010 to:

Jeremy L. Huss, Deputy Honorable Rick A Williams
Mohave County Attorney's Office

By: 

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By mal

FILED
TIME 10:40 AM

JAN 12 2011

VIRLYNN TINNELL
CLERK SUPERIOR COURT

BY: [Signature] DEPUTY

1 Matthew J. Smith
Mohave County Attorney
2 Jeremy L. Huss
Deputy County Attorney
3 State Bar No. 021831
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

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-2007-0789

11 vs.

ORDER DISMISSING CHARGE(S)

12 **RONALD JAMES PATERSON,**

13 Defendant.

14 Upon motion of the Mohave County Attorney, and good cause appearing;

15 IT IS ORDERED dismissing the charge(s) of **COUNT 1: THEFT, CLASS 5**

16 **FELONY; COUNT 2: THEFT, CLASS 5 FELONY**, against RONALD JAMES

17 PATERSON, with prejudice and exonerating the bond, if any, and quashing the warrant,

18 if any, in this matter.

19 DATED this 10th day of January, 20 11.

20 [Signature]
JUDGE OF THE SUPERIOR COURT
21 STEVEN F. CONN



88015CR20070789

Huss/07-F-1189

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

2 JEREMY L. HUSS
3 DEPUTY COUNTY ATTORNEY

4 JASON R. STEFFEN
DEPUTY PUBLIC DEFENDER
5 Mohave County Public Defender's Office
P O Box 7000
6 Kingman AZ 86402

7 FUGITIVES AND WARRANTS DIVISION
8 MOHAVE COUNTY SHERIFF'S OFFICE

8 By _____

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