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

THE STATE OF ARIZONA, Plaintiff, vs. **JAMES LAMON (006),** **JOHN EASTMAN (013),** **CHRISTINA BOBB (016),** **MICHAEL ROMAN (017), and** **MARK MEADOWS (018),** Defendants.	Case No.: **CR2024-006850-006** **CR2024-006850-013** **CR2024-006850-016** **CR2024-006850-017** **CR2024-006850-018** **STATE'S RESPONSE RE: DEFENDANT JAMES LAMON'S MOTION TO COMPEL DISCLOSURE** (Assigned to the Honorable Sam Myers)

The State asks this Court to deny Defendants' (John Eastman, Christina Bobb, Michael Roman, and Mark Meadows) motion to compel disclosure of broad swaths of information not covered within the automatic disclosure provisions of Rule 15.1, including material protected by the attorney-client privilege. It is unsupported by law and risks miring this case in invasive, unduly burdensome, and irrelevant discovery.

DISCUSSION

In this case, the State has already disclosed more than 74,000 bates stamped pages of material to Defendants in 20 supplemental disclosure statements, and is diligently pursuing its Rule 15.1 discovery obligations.

Defendants now demand five expansive categories of information from the State: (1) the "investigative file"; (2) documents regarding the State's decision "not to open an investigation into these defendants" or the acts underlying the indictment; (3) documents regarding the "2020 election, the 2020 Republican electors, President Trump, this prosecution, and/or the investigation that resulted in this prosecution"; (4) documents regarding States United Democracy Center ("States United"); and (5) documents regarding the Progressive State Leaders Committee ("PSLC"). As explained below, Defendants have failed to meet their burden with respect to each of these demands.

A. Legal Standards for Evaluating Defendants' Requested Disclosures

The State begins by describing the applicable legal rules and standards governing the State's disclosure obligations and the application and waiver of attorney-client privilege and work-product protections.

1. The State's Disclosure Obligations Under Arizona Rule of Criminal Procedure 15.1(b)(8) and *Brady v. Maryland*, 373 U.S. 83 (1963)

Rule 15.1(b)(8) requires the State to "make available to the defendant the following material and information within the State's possession or control: . . . all existing material or information that tends to mitigate or negate the defendant's guilt or would tend to reduce the defendant's punishment." It codifies the Supreme Court's decision in *Brady*, which is

"rooted in the due process clause and its purpose is to protect a defendant's 'right to a fair trial by ensuring the reliability of the verdict against him.'" *State v. O'Dell*, 202 Ariz. 453, 457, ¶ 10 (App. 2002) (quoting *United States v. Coppa,* 267 F.3d 132, 138 (2nd Cir. 2001)). But a prosecutor's obligations under Rule 15.1 do not encompass all material within their possession. As aptly summarized by the Ninth Circuit:

> The animating purpose of *Brady* is to preserve the fairness of criminal trials. . . . Extending the *Brady* rule to opinion work product would greatly impair the government's ability to prepare for trials. Thus, in general, a prosecutor's opinions and mental impressions of the case are not discoverable under *Brady* unless they contain underlying exculpatory facts.

Morris v. Ylst, 447 F.3d 735, 742 (9th Cir. 2006) (citations omitted) (quoting *United States v. Bagley*, 473 U.S. 667, 675 (1985)).

Therefore, internal materials containing the mental impressions and opinions of a prosecutor or agent of the prosecution are not required to be disclosed under *Brady* because they are not material to guilt or punishment. *Id.*; *see also, e.g.*, *United States v. Pfingst*, 477 F.2d 177, 195 (2nd Cir. 1973) (government was not required to disclose portions of intra-office memorandum containing "summaries and evaluation of the evidence and a discussion of the legal and practical problems of a prosecution from the Government's point of view"); *United States v. NYNEX Corp.*, 781 F. Supp. 19, 25-26 (D.D.C. 1991) ("A particular government attorney's opinion as to the strength or weakness of a[n] . . . argument, or as to the clarity or meaning of [a key component of the criminal case], would not preclude a contrary argument during litigation by the government or bind a court's ruling.").

2. Arizona Rule of Criminal Procedure 15.1(g)

A defendant seeking material or information going *beyond* the State's Rule 15.1 disclosure obligations must show: (1) he has "a substantial need for the material or information to prepare [his] case"; and (2) he "cannot obtain the substantial equivalent by other means without undue hardship." Ariz. R. Crim. P. 15.1(g)(1). To meet this standard, the defendant must make some showing that the requested material or information will support a cognizable claim or defense; mere speculation, conjecture, and a hope that something will "turn up" is not sufficient. *See, e.g.*, *State v. Fields*, 196 Ariz. 580, 582-83, ¶¶ 4-9 (App. 1999) (rejecting defendant's request to access, occupy, and record crime lab's operations when defendant failed to explain how such an order would support challenges to the testing conducted by the lab in their cases); *State v. Superior Court (Hoffman)*, 107 Ariz. 332, 334 (1971) (defendant "must show how the production of the requested evidence would aid in the presentation of his defense"); *State v. Hatton*, 116 Ariz. 142, 150 (1977) ("Discovery rules are not meant to be used for 'fishing expeditions.'") (quoting *State ex rel. Corbin v. Superior Court*, 103 Ariz. 465, 468 (1968)).

3. Waiver of Attorney-Client Privilege and Work Product Protection

Attorney-client and work product protections also apply in the context of disclosure obligations. "In the criminal context, 'unless a client consents, a lawyer may not be required to disclose communications made by the client to the lawyer or advice given to the client in the course of professional employment.'" *State v. Fodor*, 179 Ariz. 442, 448 (App. 1994) (quoting *Samaritan Found. v. Goodfarb*, 176 Ariz. 497, 501 (1993)); A.R.S. § 13-4062(2). Moreover, work product privilege protects materials from disclosure "to the extent they

contain the opinions, theories, or conclusions of the prosecutor or defense counsel, members of their respective legal or investigative staff, or law enforcement officers." Ariz. R. Crim. P. 15.4(b)(1); *see also United States v. Nobles*, 422 U.S. 225, 238 (1975) (observing that work-product doctrine is "even more vital" in criminal justice system).

The scope of waiver of these protections is governed by Arizona Rule of Evidence 502(a), which provides that:

> When the disclosure is made in an Arizona proceeding and waives the attorney-client privilege or work-product protection, the waiver extends to an undisclosed communication or information in an Arizona proceeding only if:
>
> (1) the waiver is intentional;
>
> (2) the disclosed and undisclosed communications or information concern the same subject matter; and
>
> (3) they ought in fairness to be considered together.

This rule, as well as its nearly identical federal counterpart, codifies the fairness doctrine, or the principle that the scope of a waiver of attorney-client privilege or work-product protection should be tailored "to protect against the unfairness that would result from a privilege holder selectively disclosing privileged communications [or work product] to an adversary." *Tenenbaum v. Deloitte & Touche*, 77 F.3d 337, 340 (9th Cir. 1996); *see State v. Winegardner*, 243 Ariz. 482, 485, ¶ 8 (2018) ("When an Arizona evidentiary rule mirrors the corresponding federal rule, we look to federal law for guidance.").

"Thus, subject matter waiver is limited to situations in which a party intentionally puts protected information into the litigation in a selective, misleading and unfair manner." Fed. R. Evid. 502 advisory committee notes; *see also Nobles*, 422 U.S. at 240 (finding

district court properly exercised discretion in finding limited waiver of work-product doctrine and not allowing a "general 'fishing expedition' in the defense files"). And assessing "whether the undisclosed material ought to be considered with the disclosed material requires a case-specific analysis of the subject matter and adversaries." *Appleton Papers, Inc. v. EPA*, 702 F.3d 1018, 1026 (7th Cir. 2012).

B. The Court Should Deny Each of Defendants' Disclosure Requests.

Applying the above-referenced standards, the State now explains why the Court should reject each of the Defendants' requests.

1. Investigative File

Defendants first seek "[a] complete copy of the investigative file for this case." (Def. James Lamon's Mot. to Compel Disclosure, Dkt. No. 1991, at 4, ¶ 1.) Defendants offer no detail as to what the term "investigative file" means in the context of their request, or whether the request is intended to include material that would ordinarily be protected by attorney-client privilege or the work-product doctrine. Defendants claim that the State's recent disclosure of a memorandum discussed further in section four, below, "calls into question the completeness" of the State's disclosure to this point, and thus a court order is needed to compel "any document . . . that has not yet been disclosed." (*Id.* at 4 n.2.)

Simply put, this request does not set forth a cognizable discovery request. Indeed, the request is so generalized and vague that it is difficult for the State to substantively address it. There is no general right to discovery in a criminal case, and the State is aware of and complying with its obligations under Rule 15.1, including its obligation to disclose exculpatory evidence that is material to guilt or punishment. *State v. Tucker*, 157 Ariz. 433,

438 (1988). The Court should deny this request as seeking the exact type of fishing expedition prohibited by Rule 15.1(g). *Hatton*, 116 Ariz. at 150; *Nobles*, 422 U.S. at 240.

2. Documents and/or Communications Concerning Decisions Not to Open Investigations and Referrals and/or Communications to Federal Law Enforcement.

Defendants request this Court order disclosure of "[a]ny Document or Communication concerning any decision by the Attorney General's Office not to open an investigation into these defendants or the acts underlying the charges in the indictment." (Dkt. No. 1991, at 4, ¶ 2.)

Defendants label this information as potentially exculpatory, but offer no explanation or support for this assertion. (*Id.* at 4 n.3.) Neither *Brady* nor Rule 15.1(b)(8) require the State to disclose any opinions, impressions, or analysis conducted by prosecutors and/or staff related to defendants or their conduct. *Morris*, 447 F.3d at 742. As discussed in *Morris*, characterizing the mental impressions and opinions of the prosecution, including those related to decision to close investigations or refer cases to other prosecutorial agencies, would undermine the adversarial system and risk converting *Brady* into a rule of general discovery. *Id.* Moreover, Defendants have not explained how prior evaluations of this case by other individuals could be considered exculpatory. Even if prior attorneys for the State or federal law enforcement had differing views or opinions of the strength and weakness of the case at that time, such opinions are irrelevant to the Defendant's guilt or innocence. And binding the State to its preliminary evaluations would discourage prosecutors from engaging in a searching assessment of a case as it develops.

See NYNEX Corp., 781 F. Supp. at 25-26. Nor is their waiver of any legal privilege over those opinions, impressions, or analysis for the reasons discussed below.

Finally, Defendants have made no showing whatsoever as to how the requested materials would be admissible and material or would lead to the discovery of admissible, material evidence. *See Hoffman*, 107 Ariz. at 334; *Wood v. Bartholomew*, 516 U.S. 1, 5-8 (1995) (rejecting finding of *Brady* materiality where assertion that disclosure would have led to admissible evidence was "based on mere speculation").

Because the requested materials are not exculpatory in nature and Defendants have not demonstrated a need for the materials beyond their desire to obtain them, the Court must deny this request.

3. Non-Privileged Communications Made by Trial Prosecutors, Communications made by Attorney General Kris Mayes or Chief Deputy Dan Barr, and Communications made by Attorney Kris Mayes' Campaign.

Next, Defendants make three requests for communications concerning "the 2020 election, the 2020 Republican electors, President Trump, this prosecution, and/or the investigation that resulted in this prosecution": (1) any non-privileged communications made by the current trial prosecutors, Assistant Attorney Generals Nicholas Klingerman and Krista Wood made on these topics, from January 2, 2023 to present; (2) any official or personal communications, whether privileged or non-privileged, made by Attorney General Kris Mayes and Chief Deputy Dan Barr on these topics from January 2, 2023, to present; and (3) any communications made by the Attorney General's campaign, Kris Mayes for Arizona, on these topics, without any specific timeframe. (Dkt. No. 1991, at 4-5, ¶¶ 4-6.)

As with Defendant Rudolph Giuliani's August request for the personal information of millions of potential grand jurors, Defendants continue to make the phrase "fishing expedition," feel insufficient. (*see* Def. Giuliani's Mtn. for Grand Jury Records, Dkt. 1265.) By its plain terms, the requests related to AAG Klingerman and Wood make no effort to distinguish between personal and public communications, and are not even limited to the tenure of either attorney in the Attorney General's Office; AAG Klingerman was not employed at the Attorney General's Office from September 2022 through much of June 2023, and AAG Wood's employment began in September 2023.

Even reading the requests charitably to avoid these absurdities, Defendants still seek to require the State to sift through nearly two years of communications made by members of the Attorney General's Office to gather information on topics as broad and undefined as "President Trump."[1] They also wish for this Court to order the same for the Attorney General's Campaign, a private entity with no involvement in the State's investigation and prosecution of Defendants.

In support of this extraordinarily broad request, Defendants offer neither a single source of authority to explain its propriety, nor even a hint of a showing that the requested materials contain relevant evidence needed to prepare their cases. Instead, Defendants appear to take their entitlement to these communications as a matter of course, under Rule

[1] Of course, Defendants are entitled to submit requests for public records, including for non-privileged public communications, just as any other member of the public. A.R.S. § 39-121. As Defendant Eastman outlined in his joinder to the Motion to Compel, he has submitted a public records request for such communications, and the State has been in contact with his counsel to fulfill the request in a timely manner. (Def. Eastman's Notice of Joinder, Dkt. 2003.)

15.1(g) and (b)(8). But that is not the law. Under Rule 15.1(g), the defendant bears the burden to "show how the production of the requested evidence would aid in the presentation of his defense." *Hoffman*, 107 Ariz. at 334. And in the context of motions to compel allegedly exculpatory evidence, "[m]ere speculation that a government file may contain *Brady* material is not sufficient. " *State v. Acinelli*, 191 Ariz. 66, 71 (App. 1997) (quoting *United States v. Navarro*, 737 F.2d 625, 631 (7th Cir. 1984)). In light of these standards, Defendants have not explained how the material they seek here is "exculpatory" by any definition; communications expressing an individual's opinion on topics as broad and ambiguous as "President Trump," for example, have nothing to do with Defendants' guilt or innocence.

Nor does the Anti-SLAPP statute provide independent grounds for the Defendants' unprecedented requests. Indeed, the only specific discovery provision contained within the Anti-SLAPP statute, A.R.S. § 12-751(E), contemplates a *stay of discovery after* a prima facie finding has been made in the movant's favor.[2] The statute, therefore, aligns with the closely-related contexts of selective-prosecution and selective-enforcement claims, where a rigorous threshold for discovery is necessary to prevent the "assertion of spurious claims . . . as a means of burdening criminal trials with massive discovery of material completely irrelevant to the defendant's case." *Jones v. Sterling*, 210 Ariz. 308, 315-16,

[2] Defendant Lamon appears to acknowledge this fact. In a recently filed supplement to his Anti-SLAPP motion, Defendant Lamon stated that the requested materials in the motion to compel were intended to be used to support his Anti-SLAPP claims at hearing if the Court found that a prima facie case had been made. (Def. Lamon's Supp. to Anti-SLAPP (filed 11/21/2024), Dkt. 1992, at 7-8.)

¶ 32 (2005) (quoting *State v. Ballard*, 752 A.2d 735, 741 (N.J. Ct. App. Div. 2000)); *United States v. Armstrong*, 517 U.S. 456, 468 (1996) ("The justifications for a rigorous standard for the elements of a selective-prosecution claim thus require a correspondingly rigorous standard for discovery in aid of such a claim.").

Ultimately, because Defendants do not articulate the rationale for these requests, the State is left to speculate on their purpose. At best, they seek this Court's authorization to engage in a "blind fishing expedition" among not just the government's files, but the personal materials of individuals and entities as well, including individuals involved in a campaign that predated the investigation underlying this case, on nothing more than the mere hope that something will be uncovered. At worst, Defendants wish to turn a salutary tool for criminal defendants into a sword to harry the Attorney General's Office and chill the exercise of its employee's duties. *Bryan v. Riddel*, 178 Ariz. 472, 477 (1994) (disclosure rules not "intended to be used as swords by overzealous litigators"); *cf. Lacey v. Maricopa County*, 693 F.3d 896, 917 (9th Cir. 2012) (finding abuse of criminal process by special prosecutor, including issuance of overly broad subpoenas demanding sensitive materials and communications related to articles criticizing public officials, was sufficient to chill exercise of protected rights). Whichever theory is more accurate, they both lead to the same result: the request for the communications of the trial prosecutors, the Attorney General and Chief Deputy, and the Attorney General's campaign should be denied.

4. Documents and Communications Concerning States United

Next, Defendants request "[a]ny document or communication concerning States United Democracy Center, and/or any of its current or former employees, contractors,

board members, advisors, attorneys, and/or agents." (Dkt. 1991, at 5, ¶ 7.) As with Defendants' other requests, they provide neither the State nor this Court with any showing that the materials requested contain, or will lead Defendants to, relevant and admissible evidence material to their defense. Ariz. R. Crim. P. 15.1(g). Moreover, in response to the State's assertion of the work-product doctrine and attorney-client privilege, Defendants neither explain how the interests of fairness justify a broad disclosure of "any documents or communications" related to States United, nor do they distinguish between the categories of work product they seek. *See United States v. Sanmina Corp.*, 968 F.3d 1107, 1125 (2020) (discussing substantive differences between factual and opinion work product in waiver-of-privilege dispute). For these reasons alone, this request should be denied.

Defendants are not entitled to further communications and/or other work product created by States United. Nonetheless, Defendants assert that the State waived applicable work-product protections and attorney-client privilege related to its communications with States United, *in toto,* by disclosing to the Defendants a July 2023 memorandum States United prepared pursuant to a retainer with the Attorney General's Office ("the Memo").[3] The Memo drew on publicly available sources to provide an overview of the elector scheme, potentially applicable criminal statutes and potential defenses. The State disclosed

[3] The State has disclosed the engagement agreement between States United and the Attorney General's Office.

the Memo to Defendants in its entirety, because it had attached the Memo to several of its search warrant applications.[4]

The Court should reject the Defendants' claim of waiver. Contrary to Defendants' claims, a blanket waiver of the attorney-client and work-product privileges is inappropriate, because fairness does not require it. *Hernandez v. Tanninen*, 604 F.3d 1095, 1101 (9th Cir. 2010) (holding that erroneous blanket waiver finding, "untethered to the subject-matter disclosed, constitutes a particularly injurious privilege ruling"). Instead, subject matter waiver is "reserved for those unusual situations in which fairness requires a further disclosure of related, protected information, in order to prevent a selective and misleading presentation of evidence to the disadvantage of the adversary." *Gateway Deliveries, LLC v. Mattress Liquidators, Inc.*, 2:14-CV-02033 JWS, 2016 WL 232427, at * 3 (D. Ariz. Jan. 19, 2016) (citation omitted). But the Memo was not a selective, misleading, or unfair presentation of information. Ariz. R. Evid. 502(a); *Nobles*, 422 U.S. at 239-40; *see also In re Echostar Comms. Corp.*, 448 F.3d 1294, 1303 (Fed. Cir. 2006).

To the contrary, the scope of waiver should not be extended beyond the Memo and any underlying factual material referenced within it, for two reasons. First, further waiver

[4] The State observes that this memorandum, which relied on publicly available information at the time concerning the 2020 election, was attached to the search warrants inadvertently. It is undersigned counsel's belief that the State instead intended to attach one of several publicly-available memoranda posted by States United concerning the events in Arizona during the aftermath of the 2020 election. *See, e.g.*, *The January 6 Hearings*, States United Democracy Center (Sept. 26, 2022), https://statesunited.org/resources/1-6hearings/; *The January 6 Hearings: Arizona Spotlight*, States United Democracy Center (Sept. 26, 2022), https://statesunited.org/resources/1-6arizona/; *Countering Lies about the 2020 Presidential Election*, States United Democracy Center (Jan. 10, 2021), https://statesunited.org/resources/countering-lies-about-the-2020-presidential-election/.

of attorney-client privilege and work-product protections are not necessary, as a matter of fundamental fairness, because the States United Memorandum was comprehensive in its discussion of then-publicly available material about the Defendants' conduct and potential defenses available to them; the State disclosed the Memo *in its entirety* to the Court, as an attachment to several of its search warrants, and, later, to the Defendants, pursuant to Rule 15.1. *See Addington v. U.S. Airline Pilots Ass'n*, CV 08-1633-PHX-NVW, CV 08-1728-PHX-NVW, 2009 WL 348744, at *2-3 (D. Ariz. Feb. 11, 2009) (narrow waiver where attorney memorandum was "in its complete form [and] the disclosure [wa]s not calculated to conceal other facts."). The Memo pulls no punches in acknowledging where, at that point in time, further investigation was needed. In other words, the Memo represents no more than exactly what it purports to be; a comprehensive assessment of the facts, the law, and the strengths *and* weaknesses of prosecuting potential crimes based on then-publicly available information.

Thus, it is difficult to imagine how the State's disclosure of the Memo could somehow be unfair to the Defendants, as the Memo does not present only one side or analysis only favorable to the State. Indeed, Defendant Lamon asserts in this very motion that the memorandum is *beneficial* to their defense. (Dkt. 1991, at 2.) This assertion belies the Defendants' supposition that they have somehow been prejudiced and exposes their true goal: to mire the State's case in endless disputes. But that is not the purpose of discovery, even in the context of privilege disputes. *Sanmina Corp.*, 968 F.3d at 1125 ("While it might certainly be helpful to the IRS to have access to the entirety of the

memoranda, this reason does not justify the IRS's entitlement to the legal theories and opinions of its potential adversary in litigation.").

Second, the context in which the States United Memorandum was introduced into the criminal proceedings here militates against a broad subject matter waiver. As outlined above, the Memo was attached to the State's affidavits for several search warrants, not as substantive evidence related to its case in chief before the grand jury. Because (1) probable cause is all that is required to authorize a search warrant; and (2) the warrant application process is not subject to the same level of adversarial testing as trial proceedings, further waiver/disclosure of privileged materials related to States United would be inappropriate. *See United States v. Ventresca*, 380 U.S. 102, 107-08 (1965); *United States v. Colkley*, 899 F.2d 297, 302-03 (4th Cir. 1990) (refusing to import exculpatory evidence requirement to warrant application process).

Of course, Defendants are entitled to challenge the sufficiency of the warrants or to seek to suppress them on other grounds. But Defendants have made no showing that further disclosure of attorney-client privileged communications or work product is needed to avoid prejudice in any suppression proceedings. And the State does not intend, and would have no basis to introduce, the States United Memorandum as evidence in trial proceedings. Accordingly, the Memo's limited usage in the search warrant process does not justify subject matter waiver beyond the memorandum itself, and this request should be denied.

5. Documents and/or Communications Concerning the Progressive State Leaders Committee.

Finally, Defendants request the Court order disclosure by the State of "[a]ny Documents or Communications" within its custody or control "concerning the Progressive State Leaders Committee," including "any of its current or former employees, contractors, board members, advisors, attorneys, and/or agents." (Dkt. 1991, at 5, ¶ 8.) Defendants again offer no explanation for the basis for this request or showing of substantial need for the requested materials, though they erroneously claim that States United is "the election arm" of PSLC. (Dkt. 1991, at 2.) States United began as a nonpartisan program of PSLC in the summer of 2020, the Voter Protection Program. Following the election, in January 2021, the program separated from PSLC to become a separate and independent legal entity, States United. This separation occurred long before States United entered into a retainer agreement with the Attorney General's Office in 2023 or drafted the Memo. Because it is entirely unclear what possible relevance documents or communications related to the PSLC could have to this case, the Court should deny this request.

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CONCLUSION

For the reasons set forth above, the State respectfully requests that Defendants' Motion to Compel be denied in full.

Respectfully submitted January 6, 2025.

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The Honorable Sam Myers
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