

1 **WILLIAM P. RING**
2 **COCONINO COUNTY ATTORNEY**

3 Eric Ruchensky
4 Bar # 030328
5 Deputy County Attorney
6 110 E. Cherry Avenue
7 Flagstaff, Arizona 86001-4627
8 PHONE: (928)679-8200
9 FAX: (928) 679-8201
10 Attorney for the State

VALERIE WYANT, CLERK
19 MAY 31 PM 3:08
MA

11 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

12 **IN AND FOR THE COUNTY OF COCONINO**

13 STATE OF ARIZONA,

14 Plaintiff,

15 vs.

16 ABRAHAM PUENTES-ORTIZ,

17 Defendant.

No. CR2018-00750

**NOTICE OF STATE'S INTENT TO
ADMIT GANG EXPERT TESTIMONY**

Hon. Cathleen Brown-Nichols – Div. 5

18 The State of Arizona, by and through the undersigned deputy, hereby
19 provides notice of the State's intent to admit expert testimony regarding criminal
20 street gangs through Officer Patrick Condon of the Flagstaff Police Department.
21 Defense counsel has interviewed Officer Condon already. Officer Condon is
22 available for further interview regarding gang expert testimony should it be
23 required. Officer Condon's proposed testimony in this case is clearly admissible
24 under Arizona Evidence Rules 401, 402, 403, and 702. Knowledge regarding criminal
25 street gangs is outside the knowledge of laypersons and such expert testimony will
26 aid the factfinder. The State's presentation of the evidence will necessarily include
information regarding criminal street gangs.

WILLIAM P. RING
COCONINO COUNTY ATTORNEY
110 E. CHERRY AVENUE
FLAGSTAFF, ARIZONA 86001-4627
(928) 679-8200

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

RESPECTFULLY SUBMITTED this 31st day of May, 2019.

By Eric Ruchensky
Eric Ruchensky
Deputy County Attorney

COPY of the foregoing
mailed/delivered this 31
day of May, 2019, to:

The Honorable Cathleen Brown-Nichols
c/o Courthouse Box

Joseph Carver
Attorney for Defendant

WILLIAM P. RING
COCONINO COUNTY ATTORNEY
110 E. CHERRY AVENUE
FLAGSTAFF, ARIZONA 86001-4627
(928) 679-8200