

1 DENNIS K. BURKE  
United States Attorney  
District of Arizona

2  
3 FRANK T. GALATI  
Assistant U.S. Attorney  
Arizona State Bar No. 003404  
frank.galati@usdoj.gov

4  
5 JAMES R. KNAPP  
Assistant U.S. Attorney  
Arizona State Bar No. 021166  
james.knapp2@usdoj.gov  
6 Two Renaissance Square  
40 N. Central Avenue, Suite 1200  
7 Phoenix, Arizona 85004-4408  
Telephone: (602) 514-7500

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF ARIZONA

10 United States of America,  
11  
12 Plaintiff,  
13  
14 v.  
15 Janice Sue Taylor,  
16  
17 Defendant.

No. CR-10-0400-PHX-DGC  
**GOVERNMENT’S MEMORANDUM  
RE DISCOVERY**

16 The United States, through undersigned counsel, submits this Memorandum in response  
17 to the Court’s questions at the April 1, 2011, pretrial conference regarding the March 18, 2011,  
18 and March 27, 2011, productions of additional discovery. The United States has provided  
19 expansive discovery to Defendant, beyond what is required by caselaw, statute, or rule. In  
20 addition, the United States provided Defendant with draft exhibit lists on February 4, 2011, and  
21 March 18, 2011.

22 **1. March 18, 2011, Production.**

23 Discovery 7783-10205: Trial exhibits 150-160 (complete bank records). Copies of Ms.  
24 Taylor’s commission checks are marked separately as exhibits within the 200-300 range, most  
25 of which were produced on August 18, 2010. On that same day, the United States invited  
26 Defendant to inspect and copy additional material related to the case, specifically mentioning  
27 the bank records. Defendant reviewed the material on September 22, 2010, and requested copies  
28 of over 1300 pages of material, but she did not request copies of the bank records. The United

1 States produced the requested material, and Defendant has not asked for another opportunity to  
2 review the material.<sup>1/</sup>

3 **2. March 27, 2011, Production.**

4 Discovery 10206-10292: Trial exhibits 83, 180-182, 190-193, 215, 267. Exhibits 180-182  
5 were previously labeled TAYLOR004485, TAYLOR004478, and TAYLOR004553 and  
6 produced on November 15, 2010, but not labeled as exhibits at that time. Exhibits 190-193 are  
7 pleadings and orders from a civil suit regarding a land transaction, and were provided by a  
8 witness during a March 23, 2011, trial preparation meeting. The rest of the material was  
9 available for inspection on September 22, 2010.

10 Discovery 10292-10505: Early disclosure of additional Jencks Act material, consisting  
11 of a three-page report for a December 23, 2010, witness interview and 210 pages of IRS revenue  
12 officer notes from January 2002 through July 2010.

13 Respectfully submitted this 4<sup>th</sup> day of April, 2011.

14 DENNIS K. BURKE  
15 United States Attorney  
16 District of Arizona

17 *s/ James Knapp*

18 FRANK T. GALATI  
19 JAMES R. KNAPP  
20 Assistant U.S. Attorneys

21 Certificate of Service

22 I hereby certify that on 4/4/2011, I electronically transmitted the attached document to the  
23 Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic  
24 Filing to the following CM/ECF registrants:

25 Susan Anderson

26 In addition, I mailed copies of the attached document to the following:

27 Janice Sue Taylor  
28 3341 Arianna Ct.  
Gilbert, AZ 85298

---

<sup>1/</sup> On November 10, 2010, Defendant moved to compel the United States to provide copies of "every document [the United States] has shown [Defendant], that [the United States] may or may not use in discovery in any forthcoming trial." (Docket No.158 at 2.) The United States opposed this request as overly broad, and it was denied. (Docket Nos. 169, 185).