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BCE06-3404

10 IN THE UNITED STATES DISTRICT COURT FOR THE
11 DISTRICT OF ARIZONA (PHOENIX DIVISION)

12
13 United States of America,
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15 Plaintiff,

16 v.
17 JAMES LESLIE READING; CLARE L.
18 READING; FOX GROUP TRUST;
19 MIDFIRST BANK; CHASE; FINANCIAL
20 LEGAL SERVICES; and STATE OF
ARIZONA,

Defendants.

Civil No. 2:11-cv-00698-FJM

STATE OF ARIZONA (DOR)
SUPPLEMENTAL DISCLOSURE
UNDER FEDERAL RULES OF CIVIL
PROCEDURE 26(a)(1)

21 The State of Arizona ex rel. the Arizona Department of Revenue (“Defendant”),
22 by and through its undersigned counsel, hereby provides supplemental disclosure under
23 Federal Rule of Civil Procedure 26 (a) (1):

24 **A. Disclosures Regarding Documents (Rule 26 (a) (1) (A) (ii))**

25 a. The State of Arizona ex rel. the Department of Revenue has filed liens with
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the County Recorder of Maricopa County Arizona. The Initial Disclosure by the State filed August 26, 2011 stated the following: “On May 25, 2000, the Defendant recorded with the County Recorder of Maricopa County, Arizona, a Notice of State Tax Lien with respect to an assessment against Defendant James L. Reading for tax years 1992, 1993, 1994, and 1995.” In further reviewing the case, the State determined that the lien referred to may not be the correct lien providing a possible priority. On August 6, 2003, Defendant State of Arizona recorded with the County Recorder of Maricopa County, Arizona, a Notice of State Tax Lien with respect to an assessment against C(lare) Reading for tax years 1994 and 1995 (See Exhibit 1 attached hereto). On September 3, 2008, the Defendant recorded with the County Recorder of Maricopa County, Arizona, a Judgment with respect to an assessment against Defendants Clare L. Reading and James L. Reading for tax years 1994 and 1995 (Attached as an Exhibit to the Initial Disclosure).

- b. The State of Arizona ex rel. the Department of Revenue also has in its possession documents related to tax returns/audits and calculation of liability.

Respectfully submitted this 31st day of January, 2012.

THOMAS C. HORNE
Attorney General

/s/ Robert P. Ventrella
ROBERT P. VENTRELLA
Assistant Attorney General

1 Copy of the foregoing hand-delivered
2 this 31st day of January, 2012, to:

3 Hon. Frederick J. Martone
4 401 E. Washington Street
5 Suite 130, SPC 1
6 Phoenix, AZ 85003-2118
7 Presiding Judge

8 Copy of the foregoing mailed
9 this 31st day of January, 2012, to:

10 Mr. Tommy K. Cryer
11 Cryer Law
12 7330 Fern Ave., Ste. 1102
13 Shreveport, LA 71105
14 Attorney for Co-Defendants, James Leslie Reading,
15 Clare L. Reading and Fox Group Trust

16 Mr. Paul Levine
17 McCarthy Holthus Levine
18 8502 E. Via de Ventura, Suite 200
19 Scottsdale, AZ 85258
20 Attorney for Defendant, MidFirst Bank

21 Mr. Charles Duffy
22 US Dept of Justice
23 Tax Division
24 P.O. Box 683
25 Ben Franklin Station
26 Washington, DC 20044 0683
Attorney for Plaintiff

 /s/ Joan McCarthy

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