

1 **RICK G. TOSTO, P.C.**

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4 Rick G. Tosto – #015333

5 *Attorney for Defendant WILLES*

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

7 **IN AND FOR THE COUNTY OF MARICOPA**

8 STATE OF ARIZONA,

9 Plaintiff,

10 vs.

11 ARLENA WILLES,

12 Defendant.

No: CR2019-005397-001

**DEFENDANT'S RESPONSE TO  
STATE'S MOTION IN LIMINE:  
STATEMENTS OF DEFENDANT**

**(Assigned to the Honorable Jeffrey  
Fish)**

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17 COMES NOW the Defendant, ARLENA WILLES, by and through counsel  
18 undersigned, respectfully concurs with the State's assertion that conspiracy theories  
19 related to "Medical Kidnapping", "Kids for Cash", and other theories that argue the  
20 minor victim was the target of a vast conspiracy involving medical providers at Phoenix  
21 Children's Hospital personnel, law enforcement, the courts, and the Department of  
22 Children's Services employees to remove children from their parents' custody for  
23 financial gain is not permissible under the Rules of Evidence. Counsel has absolutely no  
24 intention of offering such theories.  
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**RESPECTFULLY SUBMITTED** this 11th day of April, 2021.

**RICK G. TOSTO, P.C.**

/s/ Rick G. Tosto  
Rick G. Tosto  
P.O. Box 24397  
Phoenix, Arizona 85074

**ORIGINAL** of the foregoing filed  
with:

The Clerk of the Court

**COPY** of the foregoing sent  
this 11<sup>th</sup> day of April, 2021 to:

**HONORABLE JEFFREY FISH**  
Maricopa County Superior Court  
175 W. Madison Street  
Phoenix, Arizona 85003

**FRANKIE GRIMSMAN**  
**TRACEY GLEASON**  
Maricopa County Attorney's Office  
225 W. Madison,  
Phoenix, AZ 85003

By /s/ Rick G. Tosto