

1 Eli Dalton-Webb
2 5009 E. Ironwood Circle
3 Sierra Vista, Arizona 85650
4 email: dw4az@proton.me
5 *Plaintiff*
6

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

8
9 **IN AND FOR THE COUNTY OF COCHISE**

<p>10 11 Eli Dalton-Webb, 12 13 Plaintiff 14 15 v. 16 17 CITY OF SIERRA VISTA, an Arizona 18 municipal corporation, 19 20 Defendant 21 22</p>	<p>Case No. S-0200-CV202500919 Assigned to: Hon. Richard Karwaczka Motion for Discovery</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------

23
24
25 Defendant refuses to turn over documents in this matter, and so Plaintiff has no
26
27 evidence or understanding as to whether or not the Defendant has complied with
28
29 public records law, and whether or not further litigation is necessary in this matter
30
31 regarding whether or not the government has over-redacted the records or has turned
32
33 over all public records that were requested.
34

35
36 Plaintiff hereby moves this Court to permit discovery, pursuant to Special
37
38 Action Rule 7(g), and within the meaning of Civil Procedure Rule 34, of all redacted
39
40 public records related to Exhibit A of the Complaint for Special Action in this matter.
41
42 Plaintiff requests that these records be transmitted (or made available) to him
43
44 electronically by internet.
45
46
47
48

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
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48

Plaintiff, in his attached order proposal will propose the following language:
“IT IS ORDERED, permitting limited discovery in this matter, pursuant to Special
Action Rule 7(g). Within the meaning of Civil Procedure Rule 34, Defendant shall
electronically transmit (or make available) by internet to Plaintiff all redacted public
records related to Exhibit A of the Complaint for Special Action by _____.”

This Court is required to consider indigent persons, pursuant to Article 2 § 13
of the Arizona Constitution.

(Please note: although the City of Sierra Vista wrote “12/31/25” on the letter,
that letter was not sent until 5 January 2026)

A COPY OF THIS WILL BE SENT TO:

Jessica.Shoupe@SIERRAVISTAAZ.GOV
nathan.williams@sierravistaaz.gov

Dated this day, 25 March 2025,

/s/Eli Dalton-Webb

Eli Dalton-Webb, *Plaintiff*

Exhibit

B



EXTRAORDINARY SKIES.
UNCOMMON GROUND.

12/31/25

Hello,

Your request for records is partially available. The 911 audio has been requested by SEACOM, but we have to wait on them to provide us with copies of any recordings. In reference to the incident that occurred at the library, this case is not yet completed, but we have provided what is available. The fees involved for the available items are listed as follows:

A25-34512 - Call Card \$3.00
Redacted Bodycam \$25.00

A25-34419 - Report (partially completed) \$8.25
Redacted Bodycam \$25.00

Total Due: \$61.25

Thank you,

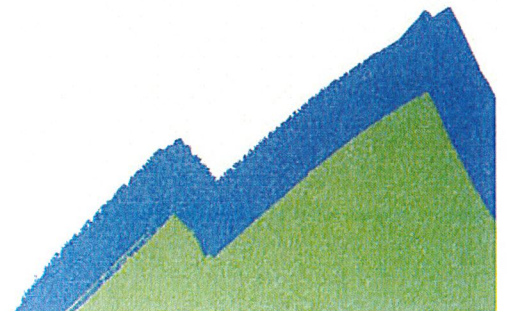


Megan Sariñana C568
Records Supervisor

CITY OF SIERRA VISTA
POLICE DEPARTMENT

911 North Coronado Drive
Sierra Vista AZ 85635
520-452-7500

www.SierraVistaAZ.gov



Exhibit

C

Today's Date: 27 January 2026

City of Sierra Vista
1011 N. Coronado Dr
Sierra Vista, AZ 85635

1

To the City of Sierra Vista:

2

This may be best forwarded to the attorney for Sierra Vista, as it is related to the matter of CV202500919 Dalton-Webb v. City of Sierra Vista.

You are hereby notified that I am financially indigent and cannot afford the fees related to obtaining copies of public records and other matters. I am hereby requesting the public records and other matters to be electronically transmitted to me at zero cost to me. Should you refuse to electronically transmit them, I alternatively request mailed copies of these public records and other matters. Should you refuse that, I request records to be transmitted using another method. NOTE: my mailing address is subject to change, depending on the time in which you send them.

The City of Sierra Vista is bound by the full provisions of the Arizona Constitution, not excluding Article 2 § 13 of the Arizona Constitution. There is case law that suggests that the government is constitutionally required to treat indigent persons equally as those with money. I cannot pay the fees for public records, and therefore, the City of Sierra Vista is constitutionally required to accommodate my financial indigency. I reserve the right to make other legal arguments and I reserve all other rights not mentioned herein.

Additionally, please be aware that you voluntarily accepted service BEFORE giving over any public records and other matters. Pursuant to 39-121.02(B), I have substantially prevailed, and pursuant to A.R.S. § 39-121.01(E) you have not promptly turned over records.

Thank you,
Eli Dalton-Webb
E-mail: dw4az@proton.me
5009 E. Ironwood Circle
Sierra Vista, Arizona 85650

1 And any person and/or entity it may concern

2 And any person and/or entity it may concern

Exhibit

D



January 28, 2026

Eli Dalton-Webb
5009 E. Ironwood Circle
Sierra Vista, Arizona 85650
dw4az@proton.me

Re: Request for Waiver of Fees

Mr. Dalton-Webb:

Thank you for your recent correspondence regarding your public records request. As you are aware, the records you have requested are ready for you to pick up, pending the payment of applicable fees. The fees charged for public records by the Sierra Vista Police Department were adopted pursuant to A.R.S. §39-129 after taking into consideration all relevant factors. The fees charged for such records apply to all records requests received by the department.

Unfortunately, the department has not adopted a policy regarding waivers of those fees. Nor am I aware of any statutory or common law basis for such a waiver. Accordingly, your request for a waiver of the fees must be denied.

Sincerely yours,



Nathan J. Williams
Sierra Vista City Attorney