

R&R Law Group Defense and Rehabilitation Plan

SITUATION: An individual is arrested or issued a citation for a drug or alcohol related offense and realizes they have two problems: (1) an addiction issue and (2) new or repeat criminal charges.

GOAL: To address both the addiction and the criminal charges simultaneously, emphasizing treatment and recovery programs that will serve both efforts. The focus is to treat the substance abuse issues, and in doing so document the individual's progress in a robust manner such that it will be useful in successfully resolving the criminal case in a favorable manner.

Thorough documentation is critical in preparing a proposal for a favorable disposition to the prosecuting agency and/or the Judge. A recovery plan being overseen and coordinated by the attorney will allow the defense to assemble materials from a variety of providers in a manner that will present favorably to the prosecution and the court.

SCOPE: On average, this is a 1-year treatment plan, and primarily applicable to those with serious substance abuse problems and facing serious criminal charges, such as drug felonies, aggravated DUI charges, or extensive jail or prison time.

PHASE ONE (Arrest and Custody): Address criminal custody issues to get client out of custody on own recognizance, bond, or ankle monitoring. Attorney to conduct initial meeting with client, family and other supportive individuals to assess release possibilities. Attorney to appear at Initial Appearance and argue for release conditions.

PHASE TWO (Initial Review): Criminal charge defense interview is conducted with client and any immediate witnesses as soon as possible, potentially while in custody, to make a contemporary recording of client's version of the events leading up to the arrest. Client to sign pre-prepared Power of Attorney, HIPA release, Authorizations to Discuss Case information and other necessary documentation. Client delivered 30 / 60 / 90 / 120 / 150 / 180 / 210 / 240 / 270 / 300 / 330 and 360 plan overview and contract.

PHASE THREE (In-Patient Transition): Transition client to an in-patient recovery program local to Arizona upon securing release from custody. In-patient recovery program and residency will be 90 days, minimum. All treatment, worksheets, journaling assignments, urinary analysis records and medical records to be released to R&R Law Group.

- *Scottsdale Recovery Center*, Detox and Treatment, located at 10446 N 74th St #115, Scottsdale, AZ 85258. Phone: 1 (888) 663-7847. Additional contact, Sara Combs (480) 694-9204. Scottsdale Recovery Center is a leading detoxification and treatment facility that offers in-patient and intensive outpatient recovery services.

PHASE THREE (Medical Assessment and Treatment): Connect client with recovery focused medical doctor for medical assessment and treatment plan. Providers to offer medical treatment options, including naltrexone implants, vivitrol shots, oral medication and short terms cleanses

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through colon hydrotherapy and intravenous balancing. All medical records to be released to R&R Law Group for mitigation purposes.

- *Dr. Steven Locnikar, Medical X, Inc.* located at 11390 E. Via Lina #103, Scottsdale, AZ 85259. Phone: (480) 219-0055. Dr. Steven Locnikar is in recovery, and started his practice to help people recovery from substance abuse. His practice focuses exclusively on the medical aspects of recovery, including outpatient detox and prescription medication designed to aid in preventing further use.
- *Dr. Keith Chambers, Chambers Clinic*, located at 20801 N. Scottsdale Road, Suite 205, Scottsdale, AZ 85255, Phone: (480) 389-3265. Dr. Chambers operates a holistic, naturopathic and traditional medicine-based practice and offers services that help individuals detox and reset their bodies to prevent further use.

PHASE FOUR (Transition to Sober Living): Upon completion of in-patient treatment program, and following the substance abuse doctor, client will transition from in-patient to intensive outpatient treatment while residing at a sober living home. Sober living will be required for 6 months. All reports and records to be released to R&R Law Group.

- *Camelback Recovery*, Owner Timothy Westbrook, Phone: (602) 466-9880. Camelback Recovery operates 6 recovery homes in Scottsdale and Phoenix that are ideal transition residences for individuals in an intensive-outpatient program.

PHASE FIVE (12-Step Program): While living in a sober residence, client is expected to participate in a 12-Step Recovery program daily.

- Client will be expected to attend 90 meetings in 90 days.
- Client will keep an attendance log and obtain signatures from all meetings.
- Client will find a Sponsor by Day 7.
- Client will have completed Step 5 by Day 30.
- Client will have completed Step 9 by Day 60.
- Client will have a Sponsee and complete Step 12 by Day 90.
- Client will join a Men's or Women's group and attend a weekly meeting at that venue.
- Client will volunteer for service commitments at his/her homegroup

For client's pending criminal case, the goal in Phase Five is to build a robust recovery network of individuals who would be willing to write a letter on behalf of the client for mitigation purposes. Target mitigation packet of character references and letters is 100 letters.

PHASE SIX (Employment): While in sober living, client will work with sponsor and/or recovery coach to revise and complete resume. Client will apply for part-time jobs and gain employment by Day 120 of sober living.

PHASE SEVEN (Transition to Permanent Living): By Day 180, client will be ready to transition to permanent living arrangement with continued recovery coaching through Camelback Recovery.

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Client will continue to attend meetings and work towards accumulating 100 mitigation letters. Client will maintain regiment of treatment prescribed by medical doctors and supplement 12-step meetings with monthly substance abuse counseling with Substance Abuse Counselor. All mitigation letters, 12-step attendance logs and treatment notes from substance abuse counselor to be provided to R&R Law Group.

- *Brough Stewart, Stewart Counseling Services*, located at 5010 E. Shea Blvd., Suite D-202, Scottsdale, AZ 85254. Phone: (602) 316-3197. Brough Stewart is a Licensed Professional Counselor emphasizing counseling for alcohol and drug use issues, common issues in early recovery, codependency, depression, self-esteem and other matters closely related to addiction.

CRIMINAL CASE DISPOSITION: All records throughout the recovery will be transmitted to R&R Law Group on a rolling basis. This includes all medical records, 12-step meeting logs, in-patient notes and attendance records, urinary analysis results, counselor notes, substance abuse counselor notes, job applications, sober living logs, character and reference letters and all other pertinent information.

These records will ultimately be reviewed by R&R Law Group attorneys and assembled into a deviation package, to include a deviation letter, and requested resolution, and an appendix of all the progress made in recovery.

During the pending case, R&R Law Group will establish a relationship with the assigned prosecutor and bureau chief and / or city prosecutor and provide them with a rolling update on client's progress twice monthly, on the second and fourth Fridays of the month. This update will include a summary of client's progress, including a summary of counseling, treatment, attendance forms to 12-step meetings and urinary analysis results.

All materials will be presented to prosecutor to obtain a favorable resolution based on mitigation alone, absent other legal issues. Should an open-range be proposed in a plea agreement, all materials will be presented at the time of sentencing. A Year Two plan will be prepared and presented to the Judge, having been developed with all parties mentioned in this recovery plan.

ADDITIONAL POTENTIAL SERVICES:

- Spiritual advisor
- Nutritionist
- Personal trainer and gym membership
- Life coach
- Recovery 2.0 membership at <https://r20.com>