

Chris Phillis  
Pinal Public Defender's Office  
P.O. Box 2457  
971 N Jason Lopez Circle, Building G  
Florence, Arizona 85132  
(520) 866-7129  
State Bar No. 014871  
Chris.phillis@pinal.gov

IN THE SUPREME COURT

STATE OF ARIZONA

IN THE MATTER OF,

**PETITION TO AMEND  
RULE 201, [Incorporating Criminal  
Procedure Rule 17.5 and 20 into  
Juvenile Court]**

**Supreme Court No. R-25-  
0052**

**COMMENT TO PETITION  
AMEND RULE 201,  
[INCORPORATING  
CRIMINAL PROCEDURE  
RULE 17.5 AND 20 INTO  
JUVENILE COURT]**

Pursuant to Rule 28(D), Rules of the Supreme Court, Chris Phillis on behalf of the Pinal Public Defender's Office respectfully submits this Comment for the Court's consideration.

**I. Reasons Proposed Rule Amendments Should Be Adopted.**

The Pinal County Public Defender's Office supports proposed Rule change R-25-0052 — Rule 201 — Incorporating Criminal Procedure Rule 17.5 and 20 into Juvenile Court. *In re Gault* extended Due Process rights to youth accused of delinquent offenses. *Application of Gault*, 387 U.S. 1, 87 S.Ct. 1428, 18 L.Ed.2d 527 (1967)). As such, youth must be afforded the ability to withdraw from a plea of delinquency to prevent a manifest injustice and receive a judgment of acquittal if the state has not produced substantial evidence to support an adjudication during an Adjudication Hearing.

In practice, the judges currently entertain requests for judgments of acquittal and withdraw from a plea, the Rule would merely codify the long-standing practice.

RESPECTFULLY SUBMITTED Thursday, April 23, 2026.

*/s/ Chris Phillis*

---

Chris Phillis  
Defense Attorney