

PEOPLE V. ANDERSON ALDRICH

Case No. 22CR6008

Division 21  
DATE FILED: February 8, 2023 6:58 PM

**[D-23] PEOPLE'S ATTACHMENT A TO PEOPLE'S RESPONSE TO DEFENDANT'S  
MOTION TO CONTINUE THE PRELIMINARY HEARING AND PROOF EVIDENT  
PRESUMPTION GREAT HEARING**

People's Attachment A  
*(Letter from Defendant's Counsel)*

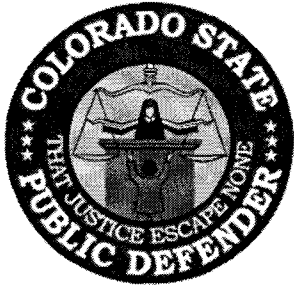
People v. Anderson Aldrich

Case No. 22CR6008

OFFICE OF THE STATE PUBLIC DEFENDER

MEGAN A. RING  
STATE PUBLIC DEFENDER

February 7, 2023



The 4th Judicial District Attorney's Office  
District Attorney Michael Allen  
105 E. Vermijo Ave  
Colorado Springs, CO 80903

Re: Case No. 22CR6008, Prosecution proposed Preliminary Exhibit Item 68

Dear Mr. Allen, Ms. Viehman, and Mr. Short,

In our review of discovery, it has come to our attention that we have not been provided certain materials that tend to negate guilt or mitigate punishment in this case. *See* Crim. P. 16(I)(a)(2); *People v. Rodriguez*, 786 P.2d 1079, 1082 (Colo. 1989). We have received a pleading filed by your office entitled "People's submission of list of potential preliminary hearing/proof evident, presumption great hearing exhibits [P-6]." When looking at the list of items in this pleading it has come to our attention that we have never seen and did not believe we have been discovered exhibit item 68.

Hence, pursuant to *Brady v. Maryland*, 373 U.S. 83, 87 (1963), *Kyles v. Whitley*, 514 U.S. 419 (1995), *Giglio v. United States*, 405 U.S. 150 (1972), *United States v. Bagley*, 473 U.S. 667 (1985), and Crim. P. 16(I)(a)(1), (2), we are requesting the disclosure of:

1. Where item 68 was located/found, by which witness, and any reports that document the collection of this exhibit, and any indication that Mx. Aldrich ever created, viewed, shared, or accessed this exhibit;

Please provide this material as soon as possible but no later than **5:00 p.m. on Wednesday February 8, 2023**. If you believe that this material has already been sent to us to in discovery, please inform us of the bates stamp/page number/section number/file name of these documents.

A hard copy of this letter will follow in the mail. If we do not hear from you by **5:00 p.m. on Wednesday, February 8, 2023**, we will consider that as a formal refusal of our request.

Sincerely,

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Joseph Archambault (No. 41216)  
Chief Trial Deputy State Public Defender

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Michael Bowman (No. 48652)  
Deputy State Public Defender