

DISTRICT COURT, El Paso County, Colorado Court Address: 270 South Tejon Street Colorado Springs, Colorado 80903	DATE FILED: <del>November 28, 2022</del> <b>November 28, 2022</b>
<b>People of the State of Colorado</b> vs. <b>Defendant: Anderson Lee Aldrich</b>	<p style="text-align: center;"><b>▲ COURT USE ONLY ▲</b></p> Case #: 2022CR6008
District Attorney: Michael J. Allen, #42955 Chief Deputy District Attorney: Reginald Short #35656 Chief Deputy District Attorney: Jennifer Viehman, #33163 105 E. Vermijo Colorado Springs, CO 80903 Phone Number: 719-520-6000	Division #: 21 Courtroom #: W450
<p style="text-align: center;"><b>[D-4]</b></p> <p style="text-align: center;"><b>PEOPLE'S RESPONSE TO DEFENSE NOTICE OF REPRESENTATION AND DEMAND FOR NOTICE OF ANY NONTTESTIMONIAL IDENTIFICATION PROCEDURE SOUGHT PURSUANT TO CRIM.P. 41.1</b></p>	

Comes now, Michael J. Allen, District Attorney for the Fourth Judicial District, and his duly appointed Chief Deputies, respectfully submits the following, [D-4] People's Response to Defense Notice of Representation and Demand for Notice of Any Nontestimonial Identification Procedure Sought Pursuant To Crim.P. 41.1. In support thereof, the People state:

1. The People hereby acknowledge that they are on notice of said representation
2. The People will follow the procedures as outlined in Crim.R. 16 for obtaining any nontestimonial identification as outlined in Crim.R. 41.1.
3. It is the People's position that Defense cannot invoke the defendant's right to remain silent, nor demand that they be present for any contact between the defendant and law enforcement.
4. The Office of the Public Defender has been appointed to represent the defendant on this case. Conceivably, there could be situations where law enforcement may need to speak with the defendant on unrelated matters. As an example, the Defense notice would make it impossible for jail personnel to speak to the defendant if he were to be a victim of a crime in the jail. As such, the People would object to any extension of representation beyond this matter.

Respectfully submitted this 28th day of November 2022.

MICHAEL J. ALLEN, #42955  
DISTRICT ATTORNEY

By: /s/ Michael J. Allen  
Michael J. Allen, #42955  
District Attorney

/s/ Reginald Short  
Reginald Short, #35656  
Chief Deputy District Attorney

/s/ Jennifer Viehman  
Jennifer A. Viehman, # 33163  
Chief Deputy District Attorney

#### CERTIFICATE OF SERVICE

I certify on the 28th day of November 2022, a true and correct copy of [D-4] People's Response to Defense Notice of Representation and Demand for Notice of Any Nontestimonial Identification Procedure Sought Pursuant to Crim.P. 41.1, was served via Colorado Courts E-Filing on all parties who appear of record and have entered their appearances according to Colorado Court's E-Filing.

/s/  
Kim Daniluk, Paralegal