DISTRICT COURT, El Paso County, Colorado

Court Address: 270 South Tejon Street Colorado Springs, Colorado 80903

DATE FILEDANEVEHIED: 28,02022041:328.PR02

People of the State of Colorado

VS.

Defendant: Anderson Lee Aldrich

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

**▲ COURT USE ONLY** 

Case #: 2022CR6008

Division #: 21

Courtroom #: W450

[D-5]

## PEOPLE'S RESPONSE TO DEFENDANT'S MOTION TO UNSEAL ARREST AFFIDAVIT TO DEFENSE

Comes now, Michael J. Allen, District Attorney for the Fourth Judicial District, and his duly appointed Chief Deputies, respectfully submits the following, [D-5] People's Response To Defendant's Motion To Unseal Arrest Affidavit To Defense. In support thereof, the People state:

1. The People do not object to releasing the arrest affidavit to the Defense Counsel, but ask the Court to craft a Protective Order as to its release as witness interviews are on-going, and expected to continue for the foreseeable future, as several critical witnesses remain in various stages of medical treatment. The People would ask that the protective order restrict release only to assigned attorneys and defense investigators attached to the case, and request no paper copies be provided to the client, for purposes of containing any sort of prospective future witness testimony.

Wherefore, the People respectfully request this Court to grant the Defendant's motion in as much as it provides for a copy to be provided to the assigned defense counsel and investigator.

Respectfully submitted this 28th day of November 2022.

MICHAEL J. ALLEN, #42955 DISTRICT ATTORNEY

By: <u>/s/ Michael J. Allen</u>

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

I certify on the 28th day of November 2022, a true and correct copy of [D-5] People's Response to Defendant's Motion to Unseal Arrest Affidavit to Defense, 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