

Exhibit B



OFFICE OF THE STATE PUBLIC DEFENDER

MEGAN A. RING
STATE PUBLIC DEFENDER

March 21, 2023

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

Re: Case No. 22CR6008, Discord materials and statements

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). 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. All information, items, or materials seized pursuant to the search warrant served on DISCORD, on January 4, 2023, as identified in discovery on pages 18-0123 – 18-0190. Specifically, all materials listed in "ATTACHMENT B."
2. Any statements attributable to Anderson Aldrich.

Admittedly, we are completely overwhelmed by the sheer volume of discovery which we have already received in this case and only been able to do a cursory review of some of the material. If you believe that we have this material already in discovery please provide us with the page number, bates number, section number, file name or any other identifying information so we can try to locate it within discovery.

Please provide these materials as soon as possible but no later than **5:00 p.m. on Monday, March 27, 2023**. If you believe that this material has already been sent to us to discovery, please inform us of the bates stamp page number 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 Monday, March 27, 2023**, we will consider that as a formal refusal of our request. A hard copy of this letter will follow in the mail.

Sincerely,

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