

DISTRICT COURT, El Paso County, Colorado Court Address: 270 South Tejon Street Colorado Springs, Colorado 80903	DATE FILED: January 9, 2023 9:59 AM
People of the State of Colorado vs. Defendant: Anderson Lee Aldrich	▲ COURT USE ONLY ▲
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	Case #: 2022CR6008 Division #: 21 Courtroom #: W450
<p>[P-2]</p> <p>PEOPLE’S MOTION TO AMEND THE COMPLAINT AND INFORMATION TO ADD COUNTS 306 THROUGH 317</p>	

Comes now, Michael J. Allen, District Attorney for the Fourth Judicial District, and his duly appointed Chief Deputies, respectfully submits the following, [P-2] People’s Motion to Amend the Complaint and Information to Add Counts 306 through 317. In support thereof, the People state:

1. The investigation in this case is ongoing, and the People respectfully request to Amend the Complaint and Information to add the following counts for Victim, Salahedin Rabayah. Count 306, Attempted Murder 1-After Deliberation, Count 307, Attempted Murder 1-Extreme Indifference, Count 308, Attempted Assault 1-Serious Bodily Injury with a Deadly Weapon, Count 309, Attempted Assault 1-Extreme Indifference, Count 310, Bias Motivated Crime and Count 316, Crime of Violence.
2. The People respectfully request to Amend the Complaint and Information to add the following counts for Victim, Ramon Rodriguez. Count 311, Attempted Murder 1-After Deliberation, Count 312, Attempted Murder 1-Extreme Indifference, Count 313, Attempted Assault 1-Serious Bodily Injury with a Deadly Weapon, Count 314, Attempted Assault 1-Extreme Indifference, Count 315, Bias Motivated Crime and Count 317, Crime of Violence.

Respectfully submitted this 9th day of January 2023.

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 9th day of January 2023, a true and correct copy of [P-2] People's Motion to Amend the Complaint and Information to Add Counts 306 Through 317, 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