

REDACTED

DISTRICT COURT, EL PASO COUNTY, COLORADO
270 S. Tejon St.
Colorado Springs, CO. 80903

People of the State of Colorado

vs.

ROBERT LEWIS DEAR, JR.

Defendant

Chief Deputy District Attorney: Jeffrey D. Lindsey
Address: 105 E. Vermijo, Colorado Springs, CO. 80903
Phone Number: 520-6000
Attorney Registration #: 24664
District Attorney: Daniel H. May, # 11397

FILED IN THE DISTRICT AND
COUNTY COURTS OF
EL PASO COUNTY, COLORADO

MAR 15 2016

DR. LYNETTE D. CORNELIUS
CLERK OF COURTS
▲ COURT USE ONLY ▲

Case #: 15CR5795

Division #: 10

Courtroom #: W570

P- 09

**MOTION TO RELEASE ITEMS TAKEN FROM VICTIMS BY LAW
ENFORCEMENT**

The District Attorney, by and through his Chief Deputy District Attorney, Jeffrey D. Lindsey, hereby informs the Court that several of the named victims in the above-captioned case are requesting personal items be returned to them. The People submit the following:

1. The items that are requested are attached on a separate page to this motion and identified as such. The civilian victims are identified through initials. The full names of the victims have been provided to the attorneys for the Defendant.
2. The People submit that the items sought to be released are not relevant to the issues attached to this case.
3. The People have notified the attorneys for the Defendant of these items and requested a response from them. To date, they have not responded.
4. The People are willing to make the items requested available for viewing if the attorneys for the Defendant wishes to view them.
5. The People request a hearing on the matter.

WHEREFORE, the District Attorney respectfully requests this Court set the matter for a hearing.



By: Jeffrey D. Lindsey, #24664
Chief Deputy District Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MOTION TO RELEASE ITEMS TAKEN FROM VICTIMS BY LAW ENFORCEMENT (P-09)** has been forwarded to the Public Defender's Office by placing it into the Public Defender's box for pickup:

3/15/16

Lina Jacques

Return of Property Requests

S.W.

- Colorado Driver's License.
- \$120 in her jacket pocket.
- Gift cards or any other identifying cards (like SSN card) in her wallet/phone case
- Oakley sunglasses
- 2 sets of work keys on a bungee cord type wrist band

P.M.

- J.M's purse and/or handbag.
- iPad mini was in a gray foldable soft case.
- 2 Epi pens had yellow or orange caps.
- Black leather wallet with a coin pocket
- White Samsung galaxy s5 phone in semi-transparent case, black battery for smartphone and mobile battery charger/bank (small white cylinder) with white cable
- 2 Ent FCU kids' account deposit sheets with stamps.
- Nissan car keys with a black key fob
- Pink Fit Bit with pink case (belt clip)

CSPD Officer [REDACTED]

- Casio G-shock Digital Watch –Black and Blue
- Black and Blue Law enforcement para cord bracelet
- FitBit charge HF Fitness Tracker
- St. Michael's pendant w/ neck chain
- Prescription glasses in case
- Black Knit Hat
- Gray Scarf
- Black Winter Gloves
- Hightop, side zipper boots

- Yak Trax
- Wireless keyboard
- Zippered, wireless keyboard sleeve
- Misc. computer cables & thumb drive
- Sony Digital Camera w/ memory stick
- Military Flyer's A-3 green gear duffle bag
- Black knife with thumb assist
- Black leather gloves found in right pant pocket
- Smith & Wesson 6306 Silver Handgun Serial # [REDACTED] w/ high 1 capacity magazine

LEFT ANKLE:

- Holster for Smith & Wesson 6906 Serial # [REDACTED]

RIGHT ANKLE:

- Holster for 2 Smith & Wesson magazines
- 2 Smith & Wesson high capacity magazines

ITEMS FOUND ON DUTY BELT:

- Stream light flashlight in holster
- Gerber multi-tool in case
- Stream light flashlight on Smith & Wesson duty handgun
- PR-24 in holder

W.F. –

- Wallet or the contents which include [REDACTED] and his Driver's License.
- Contents of his vehicle.
- Air Force wants all of their military gear which located in the very back of the vehicle.

R.S. –

- Health savings account debit card from G.S's wallet.

A.S. – Items from K.S.

- Texas Long Horn bracelet/bangle(burnt orange band with a white long horn), a transformer bracelet/bangle(black band with a white transformer) a multicolored turtle bracelet(plastic)
- iPhone 6 it had a grey or black cover on it
- Wallet(brown soft leather like material)
- Dark blue jordan back pack (at least the contents)