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IN COMBINED COURT
LA PLATA COUNTY, COLORADO

DEC 12 2018

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**DISTRICT COURT, LA PLATA COUNTY,
COLORADO**

1060 East Second Avenue
Durango, Colorado 81301

THE PEOPLE OF THE STATE OF COLORADO,
Plaintiff,

v.

MARK REDWINE,
Defendant

Megan Ring, Colorado State Public Defender
Justin Bogan, Attorney No. 33827
John Moran, Attorney No. 36019
Deputy Public Defender
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Case Number: 17CR343

Division: 1

**SECOND ADDENDUM TO DEFENDANT'S MOTION FOR CHANGE OF VENUE
AND REQUEST FOR EVIDENTIARY HEARING PRIOR TO *VOIR DIRE*
EXAMINATION BECAUSE MR. REDWINE CANNOT RECEIVE A FAIR TRIAL BY
AN IMPARTIAL JURY IN LA PLATA COUNTY DUE TO PREJUDICIAL PRE-
TRIAL PRESS COVERAGE [D-11] PUBLIC ACCESS**

1. Mark Redwine, through Counsel, hereby attaches Exhibits A, B, and C to his motion "SECOND ADDENDUM TO DEFENDANT'S MOTION FOR CHANGE OF VENUE AND REQUEST FOR EVIDENTIARY HEARING PRIOR TO *VOIR DIRE* EXAMINATION BECAUSE MR. REDWINE CANNOT RECEIVE A FAIR TRIAL BY AN IMPARTIAL JURY IN LA PLATA COUNTY DUE TO PREJUDICIAL PRE-TRIAL PRESS COVERAGE".
2. Exhibit A is an article published in the Durango Herald on December 4, 2018. This article currently has five public comments.
3. One comment is made by a Mr. Rodney Brittain. Mr. Brittain was previously contacted by investigator Tom Cowing of the La Plata County Sheriff's Office in June 2013 because he was believed to be making death threats against Mr. Redwine on a Facebook group named "Calling Mark Redwine". See Exhibit B.
4. Exhibit C is a screenshot of the Durango Herald's Facebook page. On December 4, 2018 they posted the same article referenced in paragraph two. This posting generated 9 comments, 49 reactions, and was shared 62 times.

WHEREFORE, Mr. Redwine requests that the court take notice of the attached exhibits during its consideration of Defense Motion D-11.

Respectfully submitted this December 6, 2018.

/s/ John Moran
John Moran, No. 36019
Deputy State Public Defender

/s/ Justin Bogan
Justin Bogan, No. 33827
Deputy State Public Defender

Certificate of Service
I hereby certify that on December 6, 2018
I served the foregoing document by e-filing
same to all opposing counsel of record.
/s/ Justin Bogan /s/ John Moran