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| DISTRICT COURT, WELD COUNTY, COLORADO P.O. BOX 2038 901 9 TH AVENUE GREELEY, COLORADO 80631 (970) 475-2400 | DATE FILED: September 18, 2018 |
| THE PEOPLE OF THE STATE OF COLORADO, PLAINTIFF, vs. CHRISTOPHER LEE WATTS, DEFENDANT. | ▲ COURT USE ONLY ▲ |
| District Attorney: MICHAEL J. ROURKE Address: P.O. BOX 1167 GREELEY, COLORADO 80632 Phone Number: 970-356-4010 FAX: 970-352-8023 Atty. Reg.: #28812 | Case Number: 18CR2003 Division: 5 |
| <p align="center">[O] PEOPLE’S MOTION FOR NON-TESTIMONIAL IDENTIFICATION PROCEDURE PURSUANT TO COLORADO RULES OF CRIMINAL PROCEDURE, RULE 16 II (a)(1)</p> | |

COMES NOW, MICHAEL J. ROURKE, District Attorney in and for the Nineteenth Judicial District, County of Weld, State of Colorado, and his duly appointed Chief Deputy District Attorney and Deputy District Attorney, and respectfully requests moves this Honorable Court to order the defendant to provide to Agents of the Colorado Bureau of Investigations, inked footprints of both the right and left feet of the defendant, pursuant to Rule 16 II (a)(1) of the Colorado Rules of Criminal Procedure, and as grounds therefore states:

1. The defendant is charged with three counts of Murder 1 – After Deliberation and crimes associated with those charges. The substantive counts are alleged to have occurred between and including August 12, 2018 and on August 13, 2018.
2. During the course of this investigation, items of evidence have been collected and have been sent to the Colorado Bureau of Investigation for testing. Upon receiving these items an Agent with the Colorado Bureau of Investigation developed possible bare foot impressions, using their normal latent print process for non-porous items. These impressions were developed from a bag (Frederick Police Department Item #26) which was collected at the scene where the victim’s bodies were located.
3. This procedure is expressly authorized by Crim.P.Rule 16(II)(a)(I) and (II). See People v. Angel, 701 P.2d 149, 150 (Colo. App. 1985).
4. The collecting Agent(s) will not question the defendant other than to give general instructions regarding the collection procedure.

7. The defendant will not be unfairly prejudiced by this procedure.
8. Defense counsel will be duly notified of specific time and date prior to procedures occurring.

WHEREFORE, the People ask that this Honorable Court allow the collection of inked foot prints of both the right and left feet of the defendant, pursuant to Rule 16 II (a)(1).

DATED this 18th day of September 2018.

MICHAEL J. ROURKE, #28812
DISTRICT ATTORNEY

By /s/Michael J. Rourke
MICHAEL J. ROURKE #28812
DISTRICT ATTORNEY

By /s/Steve Wrenn
STEVE WRENN, #35411
CHIEF DEPUTY DISTRICT ATTORNEY

By /s/Patrick T. Roche II
PATRICK T. ROCHE, II, #47352
DEPUTY DISTRICT ATTORNEY

CERTIFICATE OF SERVICE

I hereby certify that on 9/18/18, a true and correct copy of People's [O] was e-filed and e-served via ICCES E-System, addressed to the following: John Walsh/Kathryn Herold/Public Defender's Office
BY /s/KLHolscher