

District Court, Boulder County, Colorado Court Address: 1776 6 th Avenue Boulder, CO 80306	
THE PEOPLE OF THE STATE OF COLORADO v. Ahmad Alissa, Defendant.	DATE FILED: March 23, 2021 2:47 PM <p style="text-align: center;">σ COURT USE ONLY σ</p>
Megan Ring, Colorado State Public Defender Samuel Dunn #46901 Senior Deputy State Public Defender Kathryn Herold #40075 Supervising Deputy State Public Defender Boulder Regional Public Defenders 2555 55TH Street D-200, Boulder, CO 80301 Phone: (303) 444-2322 Fax: (303) 449-6432 E-mail: boulder.defenders@state.co.us	Case No. 21CR497 Division 13
MR. ALISSA'S OBJECTION TO CONSUMPTIVE TESTING (D-008)	

Mr. Alissa objects to the prosecution conducting any consumptive testing of evidence in this case. In support of this motion, Mr. Alissa provides the following:

1. If the prosecution intends to pursue testing that, in their estimation, would completely consume the item(s), the prosecution must establish as a fact that the quantity of sample or substance to be tested is insufficient to allow more than the single test proposed by the prosecution. Until the State meets this burden they should not pursue any consumptive testing.

2. Mr. Alissa requests that this Court order the prosecution to refrain from any testing that is or is thought to be consumptive.

Mr. Alissa makes this motion, and all other motions and objections in this case, whether or not specifically noted at the time of making the motion or objection, on the following grounds and authorities: the due process, trial by jury, right to counsel, equal protection, cruel and unusual punishment, confrontation, compulsory process, right to remain silent, and right to appeal clauses of the federal and Colorado Constitutions, and the first, fourth, sixth, eighth, ninth, tenth, and fourteenth amendments to the United States Constitution, and article II, sections 3, 6, 7, 10, 11, 16, 18, 20, 23, 25, and 28 of the Colorado Constitution.

MEGAN A. RING
COLORADO STATE PUBLIC DEFENDER

 /s/Samuel Dunn
Samuel Dunn #46901
Deputy State Public Defender

 /s/Kathryn Herold
Kathryn Herold #40075
Supervising Deputy State Public Defender

Certificate of Service

I hereby certify that on March 23, 2021, I served the foregoing document by E filing same to all opposing counsel of record.

 /s/ Sam Dunn

Dated: March 23, 2021