

District Court, Jefferson County, Colorado 100 Jefferson County Parkway, Golden, CO 80401	DATE FILED December 12, 2023 3:09 PM FILING ID: 6643D78CC4D0F CASE NUMBER: 2022CR3360 ⌘ COURT USE ONLY ⌘
PEOPLE OF THE STATE OF COLORADO, Plaintiff, v. DESIREE GONZALEZ, Accused.	
Megan A. Ring, State Public Defender Chelsea Lauwereins, No. 55011 Deputy State Public Defender Golden Regional Office 560 Golden Ridge Road, #100, Golden, CO 80401 Phone: (303) 279-7841 Fax: (303) 279-3082 Email: chelsea.lauwereins@coloradodefenders.us	Case Number: 22CR3360 Division: 7
MOTION FOR WITNESS STATEMENTS MADE TO THE PROSECUTION [D6]	

Ms. Gonzalez requests that this Court order discovery of statements made by witnesses contained in prosecutor's notes or otherwise under Colorado Rules of Criminal Procedure Rule 16(I)(a)(2) and (I)(d)(1). As grounds, Ms. Gonzalez states the following:

1. Ms. Gonzalez is requesting any and all witness statements that are inconsistent with that or any other witness's prior statements. This request includes witness statements made after the commencement of this case and also any witness statements that occur after the time of the original witness statement.
2. Ms. Gonzalez is requesting any subsequent witness statements made to the prosecutor, an investigator, or anyone from the prosecutor's office.
3. That she is requesting any witness statements made relevant to her case that the prosecutor has not yet disclosed.
4. Said information is favorable to the Defense and material to issues of guilt and punishment. Defense counsel has no other means of obtaining the information other than through the prosecution.
5. Ms. Gonzalez makes this motion under the Due Process, Right to Counsel, Confrontation, Right to Remain Silent, Compulsory Process, and Equal Protection clauses of the Federal and Colorado Constitutions, and Article II, sections 3, 6, 11, 16, 18, 23, 25 and 28 of the Colorado Constitution, and the First, Fifth, Sixth, Ninth, and Fourteenth amendments to the United States Constitution.

WHEREFORE, Ms. Gonzalez requests that this Court order discovery of statements made by witnesses contained in prosecutor's notes or otherwise under Colorado Rules of Criminal Procedure Rule 16(I)(a)(2) and (I)(d)(1).

Respectfully submitted,

Chelsea Lauwereins

Chelsea Lauwereins, No. 55011
Deputy State Public Defender
Dated: December 12, 2023

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2023, a true and correct copy of the foregoing document was served via ICCES on all parties who appear of record and have entered their appearance herein according to ICCES. //s// Chelsea Lauwereins