

County Court, Jefferson County, Colorado Court Address: 100 Jefferson County Parkway , Golden, CO 80401		
PEOPLE OF THE STATE OF COLORADO, Plaintiff v. DESIREE GONZALEZ, Defendant		DATE FILED November 8, 2023 4:01 PM FILING ID: 9DCB68BE141BF CASE NUMBER: 2022CR3360
		▲ COURT USE ONLY ▲
Chelsea Lauwereins Deputy State Public Defender 560 Golden Ridge Road, #100 Golden, CO 80401 Phone Number: (303) 279-7841 FAX Number: (303) 279-3082 E-mail address: chelsea.lauwereins@coloradodefenders.us Attorney Registration Number: 55011		Case Number: 22CR3360 Courtroom 7
MOTION FOR DISCOVERY		

Defendant moves for an Order directing the prosecuting attorney to immediately provide discovery, pursuant to C.R.Crim.P. 16(I)(a)(b)and(c) and the United States and Colorado Constitutions, of the following materials relevant to this case:

1. The names and addresses of all witnesses whom the prosecution intends to call at trial. All police, arrest, crime, and offense reports, including written or recorded statements of all witnesses, the accused, and any co-defendant.

2. Any reports or statements of experts made in connection with this case, including, but not limited to, results of physical or mental examinations, and/or scientific tests, experiments, or comparisons.

3. Any books, papers, documents, photographs, or tangible objects held as evidence in connection with this case.

4. Any record or prior criminal convictions of the accused, any co-defendant, or any person the prosecuting attorney intends to call as a witness in this case.

5. Any relevant material or information provided by an informant, the nature of such material or information, and the compensation made to said informant.

6. Any promise, benefit, or other inducement made by the government to any witness, prospective witness, or other person in exchange for such person's testimony or aid in this case.

7. All tapes and transcripts of any electronic surveillance (including wiretaps) or conversations involving the accused, any co-defendant, or witness in this case.

8. Any material or information which might tend to negate the guilt of the Defendant, be relevant to the credibility or impeachment of prosecution witnesses, or would tend to reduce Defendant's punishment.

9. The names and addresses of persons whom the prosecuting attorney intends to call as witnesses at any hearing or trial together with their relevant written or recorded statements.

10. Any written or recorded statements and the substance of any oral statements made by the accused or made by a co-defendant.

11. Any other material or information, the disclosure of which is permitted, required, or allowed by Rule 16.

The defendant revokes and rescinds all releases, waivers and authorizations for the release of information which he may have heretofore made, and he hereby asserts all of his rights and privileges under Colorado and Federal rules, statutes and principles.

MEGAN A. RING

COLORADO STATE PUBLIC DEFENDER

A handwritten signature in black ink that reads "Chelsea Lauwereins". The script is cursive and fluid, with the first letter of each name being capitalized and prominent.

Chelsea Lauwereins #55011

Deputy State Public Defender

CERTIFICATE OF SERVICE
I hereby certify that a true and
correct copy of the foregoing
document was served via CCEF to
all opposing counsel. / Julianne
Garcia