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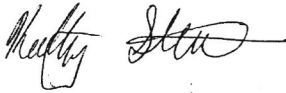
DATE FILED: March 2, 2020

DISTRICT COURT, EL PASO COUNTY, COLORADO 270 South Tejon Street Colorado Springs, Colorado 80903	DATE FILED: March 02, 2020
PEOPLE OF THE STATE OF COLORADO, Plaintiff v. LETECIA STAUCH, Defendant	σ COURT USE ONLY σ
MEGAN A. RING, Colorado State Public Defender Kathryn Strobel (No. 42850) Deputy State Public Defender 30 East Pikes Peak Avenue, Suite 200 Colorado Springs, Colorado 80903 Phone: (719) 475-1235 Fax: (719) 475-1476 Email: <a href="mailto:springs.pubdef@coloradodefenders.us">springs.pubdef@coloradodefenders.us</a>	Case No. 20CR1358  Division 5
<b>MOTION TO LIMIT PRETRIAL PUBLICITY</b>	

LETECIA STAUCH, by and through counsel, moves this Court to enter an Order limiting the dissemination of information by the attorneys, their agents, employees and all law enforcement investigators, personnel and employees, and all court personnel concerning this case. This motion is made on the following grounds:

1. The American Bar Association Standards for Criminal Justice, Fair Trial and Fair Press, Third Edition, sections 8-1.1, 8-2.1, 8-2.2 and 8-2.3.
2. The Colorado Rules of Professional Conduct, sections 3.6 and 3.8.
3. The Due Process, Trial by Jury and Trial by a Fair and Impartial Jury Clauses of the Federal and Colorado Constitutions, *U.S. Constitution*, amendments V, VI, XIV; *Colorado Constitution*, article II, sections 23, 25.
4. Ms. Stauch is guaranteed the right to a trial by jurors who are fair and impartial. *Ross v. Oklahoma*, 487 U.S. 81 (1988); *Witherspoon v. Illinois*, 391 U.S. 510, 518 (1968); *Irvin v. Dowd*, 366 U.S. 717, 722 (1961); *People v. Sandoval*, 733 P.2d 319, 320 (Colo. 1987); *Oaks v. People*, 150 Colo. 64, 371 P.2d 433, 477 (1962); *Smith v. People*, 8 Colo. 457, 8 P.1045 (1885). Thus, while Ms. Stauch is not entitled to jurors who will be sympathetic to her, she is guaranteed the right to a trial by jurors who “will hear the matter fairly and impartially.” *Edwards v. People*, 160 Colo. 395, 418 P.2d 174, 177-178 (1966). Because of the massive pre-indictment and pre-trial negative publicity, this Order is necessary to help preserve and protect, to any extent that it might be possible at this stage of the proceedings, Ms. Stauch’s right to a trial by jury and right to a trial by a fair and impartial jury.
5. Ms. Stauch moves for a hearing on this motion.

6. Ms. Stauch 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 Constitutions, and Article II, sections 3,6,7,10,11,16,18,20,23, 25 and 28 of the Colorado Constitution.



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Kathryn Strobel (No. 42850)  
Deputy State Public Defender  
Dated: March 2, 2020

**Certificate of Service**

Electronically filed by, Tamara Bailey-McIntosh