DISTRICT COURT, El Paso County, Colorado

Court Address: 270 South Tejon Street

Colorado Springs, CO 80903

DATE FILED: March 20, 2020

People of the State of Colorado

VS.

Defendant: Letecia Stauch

Deputy District Attorney: Michael J. Allen, #42955

Martha McKinney, #28745

Angelina Gratiano, #50674

Address: 105 E. Vermijo Colorado Springs, CO 80903

Phone Number: 520-6000

District Attorney: Daniel H. May, #11379

▲ COURT USE ONLY ▲

Case #: 20CR1358

Division #: 15S

Courtroom #: S403

[P - 03]

People's Motion to Amend Complaint and Information

The District Attorney of the Fourth Judicial District of the State of Colorado, through his duly appointed Deputy District Attorney, hereby requests that the Complaint and Information in this case be amended as follows:

Count One: Murder in the First Degree – After Deliberation (F1)

Count Two: Murder in the First Degree – Victim under 12/Position of Trust (F1)

Count Three: Child Abuse Resulting in Death (F2)

Count Four: Tampering with a Deceased Human Body (F3)

Count Five: Tampering with Physical Evidence (F6)

Count Six: Crime of Violence – Used Weapon (SE)

Count Seven: Crime of Violence – Used Weapon (SE)

Count Eight: Crime of Violence – Used Weapon (SE)

Count Nine: Crime of Violence - Caused Death/SBI (SE)

Count Ten: Crime of Violence – Used Weapon (SE)

Count Eleven: Crime of Violence Used Weapon (SE)

Count Twelve: Crime of Violence - Used Weapon (SE)

Count Thirteen: Crime of Violence - Used Weapon (SE)

Respectfully submitted on March 20, 2020.

/s/ Michael Allen

Michael J. Allen, #42955 Senior Deputy District Attorney

Martha McKinney, #28745 Chief Deputy District Attorney

Angelina Gratiano, #50674 Deputy District Attorney

Certificate of Service

I hereby certify that a true and correct copy of the foregoing People's Motion to Amend the Complaint and Information was served via ICCES on all parties who appear of record and have entered their appearances herein according to ICCES:

Date: March 20, 2020

By: /s/ Sara Eldridge

Paralegal