

DISTRICT COURT, El Paso County, Colorado Court Address: 270 South Tejon Street Colorado Springs, CO 80903	DATE FILED: FILED 2021 March 5, 2021
People of the State of Colorado vs. Defendant: Letecia Stauch	▲ COURT USE ONLY ▲
District Attorney: Michael J. Allen, #42955 Asst. District Attorney: Martha McKinney, #28745 Deputy District Attorney: Angelina Gratiano, #50674 Address: 105 E. Vermijo Colorado Springs, CO 80903 Phone Number: 520-6000	Case #: 20CR1358 Division #: 15S Courtroom #: S403
[P-21] People's Motion for Protective Order	

The District Attorney of the Fourth Judicial District of the State of Colorado, Michael J. Allen, hereby requests a protective order as follows:

1. On February 26, 2021, the Court held a hearing to conduct an *Arguello* Advisement with the Defendant. At the conclusion of that advisement the Court ruled that the Defendant was making a knowing, voluntary, and intelligent waiver of her right to be represented by an attorney. The Court then granted the request of the Public Defender's Office to withdraw from their representation of the Defendant and confirmed that the Defendant will represent herself pro-se going forward.
2. The People will be providing discovery directly to the Defendant and will require her signature memorializing her receipt of items delivered. Discovery may include investigative reports, audio and video recordings, surveillance video, photographs, criminal history reports, social media records, email records, cell phone records, and other forms of discovery.
3. Discovery in this case contains various types of identifying and contact information for witnesses. This information includes names, dates of birth, social security numbers, addresses, email addresses, telephone numbers, social media account details and driver's license numbers.
4. The People may also submit Out-of-State/Interstate Subpoenas to the Court that would include a witness address and potentially other known contact information. If there is an in-custody witness, the People will submit a writ to transport that

person for testimony, and such a writ would contain the person's custodial facility.

5. The People will also file a Good Faith List of Witnesses that will contain names and contact information, including potentially home addresses.
6. The Defendant, throughout the investigation and including subsequent to her arrest, has proven to be a flight risk. The Defendant also made an attempt to escape from custody during transport from South Carolina that required a physical struggle to get her under control. The Defendant has also solicited people inside and outside of jail to assist her efforts to escape from custody.
7. As a result of the Defendant's actions and the severity of the charges that have been filed against the Defendant, the People request that the Court issue a protective order allowing the People to redact identifying and contact information from discovery that is provided directly to the Defendant.
8. The People also request the Court to issue a protective order that allows the People to provide unredacted discovery to advisory counsel with the express order being that advisory counsel not share identifying and contact information of witnesses with the Defendant.

Respectfully submitted on March 3, 2021.

/s/ Michael J. Allen

Michael J. Allen, #42955
District Attorney

Martha McKinney, #28745
Assistant District Attorney

Angelina Gratiano, #50674
Deputy District Attorney

Certificate of Service

I hereby certify that a true and correct copy of the foregoing **[P-21] People's Motion for Protective Order** was personally served to the Defendant.

Date: 03/03/2021

/s/ Sara Eldridge
Paralegal