

DISTRICT COURT, EL PASO COUNTY, COLORADO 270 S. Tejon, Colorado Springs, CO 80903	DATE FILED: October 11, 2022 6:47 PM DATE FILED: October 11, 2022
<b>PEOPLE OF THE STATE OF COLORADO,</b> Plaintiff  v.  <b>LETECIA STAUCH,</b> Defendant	<input type="checkbox"/> <b>COURT USE ONLY</b> <input type="checkbox"/>  <hr/> Case Number: 2020CR1358
El Paso County Sheriff's Office Office of the County Attorney Chris Strider (No. 51124) Assistant County Attorney 27 East Vermijo Ave. Colorado Springs, CO 80903 Phone: (719) 520-7264	Div.: 15
<b>EL PASO COUNTY SHERIFF'S OFFICE POSITION REGARDING DEFENDANTS          MOTION FOR SECOND EVALUATION</b>	

The El Paso County Sheriff's Office (EPSO) by and through their undersigned counsel, hereby submit EPSO's position regarding Defendant's "MOTION FOR SECOND SANITY EXAMINATION TO BE CONDUCTED AT CMHIP IN PUEBLO (D-47)." In support thereof, EPSO states the following:

1. Leticia Stauch is currently incarcerated in the El Paso County Jail ("CJC") pending trial in the above-captioned case.
2. On September 12, 2022, Defendant submitted a motion for a sanity evaluation to be conducted at Colorado Mental Health Institute at Pueblo ("CMHIP"). The motion includes a request from the named clinical evaluator that the Defendant be monitored on an electroencephalogram ("EEG") machine for 72 hours and that a magnetic resonance imaging ("MRI") scan also be conducted on the Defendant.
3. While EPSO takes no position on the motion itself, EPSO does wish to provide the court with information on the burden posed to EPSO of providing an EEG and MRI either in CJC or in an area hospital.
4. Bringing outside medical personnel into CJC presents certain security risks and logistical problems. Because the evaluation takes 72 hours, it would be challenging to make sure these outside personnel are accommodated in a way that allows for round-the-clock monitoring of the EEG. Concerns for the Defendant's well-being

and that of any personnel would require at least one deputy to monitor the Defendant at all times during the evaluation, which would be a significant drain on EPSO resources.

5. Completing the evaluation in an off-campus location would also present significant security risks. Command staff at the jail estimates that four deputies would need to be present with the Defendant at all times that she is away from CJC. This would have an even higher cost on resources, particularly since it would mean at least five shift changes.
6. On September 15, 2022, a hearing was held on the Defendant's motion. At the hearing, the Court requested an EPSO commander from CJC and undersigned counsel be present at the next hearing in the case, which is set for October 13, 2022. Undersigned counsel will be out of state on that date due to a trip scheduled prior to the September 12 hearing and will not be present on October 13. Unfortunately, it is unlikely undersigned counsel will be able to attend remotely, due to travel planned on October 13. Commander Eric Carnell has been subpoenaed for October 13 and will be present.
7. EPSO Detentions Bureau Chief Jeff Kramer has prepared a memorandum detailing projected costs of each of the three options put before the Court at the September 15 hearing. (Attached as "Exhibit A"). It is EPSO's position that the least burdensome option for EPSO staff and resources would be that the evaluation be completed at CMHIP.

WHEREFORE, for the reasons set forth above, EPSO respectfully requests that the Court take due notice of EPSO's position in this matter.

RESPECTFULLY SUBMITTED this 11th day of October, 2022.

OFFICE OF THE COUNTY ATTORNEY  
OF EL PASO COUNTY, COLORADO

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 11, 2022, a true copy of El Paso County Sheriff's Office Position regarding Defendants Motion for Second Evaluation was e-filed and served via ICCES or sent by US Mail on all active parties and counsel of record:

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