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DISTRICT COURT, El Paso County, Colorado Court Address: 270 South Tejon Street Colorado Springs, CO 80903	DATE FILED: June 2, 2020
People of the State of Colorado vs. Defendant: Letecia Stauch	▲ COURT USE ONLY ▲
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	Case #: 20CR1358 Division #: 15S Courtroom #: S403
[P-05] People's Motion for <i>In Camera</i> Review of Department of Human Resources Documents	

The District Attorney of the Fourth Judicial District of the State of Colorado, through his duly appointed Deputy District Attorney, hereby respectfully request this Court conduct an *in camera* review of the attached records from the Department of Human Services (DHS) provided under seal to determine whether they should be released to the Defendant and if so, what appropriate protective orders shall be put into place.

Pursuant to C.R.S. § 19-1-307(1),(2)(f), reports from DHS may not be disclosed or released to any person, including the Court, except “upon its finding that access to such records may be necessary for determination of an issue before such court, but such access shall be limited to in camera inspection unless the court determines that public disclosure of the information contained therein is necessary for the resolution of an issue then pending before it.” C.R.S. § 19-1-307(1),(2)(f)

Pursuant to C.R.Crim.P. 16 (III) (d), if the court determines that the material in question must be disclosed, it may enter necessary protective orders regarding that disclosure.

Pursuant to C.R.Crim.P. 16 (III) (e), if the court determines that some portions of the material in question must be disclosed, it may excise the portions that are not subject to disclosure and disclose the remainder. It shall keep the excised portions under seal and preserved for appeal.

The People present these documents to the Court for an *in camera* review because the People believe they may contain information relevant to the issues in this case. The People respectfully request this Court determine what, if any, of the documents are to be released to the

Defendant and issue an appropriate protective order limiting the distribution of and access to the released documents.

WHEREFORE, the People respectfully request this Court review the attached documents submitted under seal *in camera* to determine whether they should be released to the Defendant.

Respectfully submitted on June 2, 2020.

/s/ Michael J. 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 **[P-05] People's Motion for *In Camera* Review of Department of Human Resources Documents** was served via ICCES on all parties who appear of record and have entered their appearances herein according to ICCES:

Date: 06/02/2020

By: /s/ Sara Eldridge
Paralegal