

Redacted

DISTRICT COURT, El Paso County, Colorado Court Address: 270 South Tejon Street Colorado Springs, CO 80903	DATE FILED: July 2, 2020
<b>People of the State of Colorado</b> vs. <b>Defendant: Letecia Stauch</b>	<b>▲ COURT USE ONLY ▲</b>
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
<b>[P-10]</b> <b>People's Notice of Receipt of Potentially Protected Information through Criminal Justice Center Records</b>	

The District Attorney of the Fourth Judicial District of the State of Colorado, through his duly appointed Deputy District Attorney, respectfully hereby gives the Defendant notice that the People have received documents containing potentially protected information regarding the Defendant received from the El Paso County Criminal Justice Center (CJC).

An Investigator with the District Attorney's Office (DAO) requested several records from CJC regarding the Defendant, Letecia Stauch. This request included general kites (inmate requests or communications with CJC staff). Personnel at CJC sent these documents but also included some records labeled as "medical kites" and "mh kites" (presumably mental health kites). These specific kites were immediately recognized as containing potentially protected information.<sup>1</sup>

These records were not viewed by any attorneys or staff of the District Attorney's Office. One copy of these records was downloaded to disc and placed into evidence with labeling indicating they are not to be copied. The remaining electronic copies of the records were destroyed. A copy of these records has not been included with this pleading pursuant to the Court's Order [O-2] Procedure for Filing Motions and Responses. A copy could be made available should the Court wish to review the documents. Attached are the People's Exhibits A and B which include two DAO reports outlining the discovery of the records and steps by our Investigator to document their handling of the records. CJC. (See People's Exhibits A and B).

<sup>1</sup> The People have previously filed a motion asking this Court to find a waiver of any privileges and we would pursue these documents, if allowed by the Court, through a subpoena duces tecum.

An Investigator from the District Attorney's Office notified CJC personnel that, in the future, medical and/or mental health records should not be forwarded to our office without a subpoena.

Respectfully submitted on July 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 on the 2<sup>nd</sup> day of July, 2020, that a true and correct copy of the foregoing [P-10] People's Notice of Receipt of Potentially Protected Information through Criminal Justice Center Records was served via ICCES on all parties who appear of record and have entered their appearances herein according to ICCES:

/s/  
Kim Daniluk - Paralegal