

District Court, Boulder County, Colorado Court Address: 1776 6 <sup>th</sup> Avenue Boulder, CO 80306	
THE PEOPLE OF THE STATE OF COLORADO  v.  <b>AHMAD AL ALIWI ALISSA</b> Defendant.	DATE FILED: August 31, 2021 11:24 AM   ♦ COURT USE ONLY ♦
Megan Ring, Colorado State Public Defender Daniel King #26129 Chief Trial Deputy State Public Defender Samuel Dunn #46901 Senior Deputy State Public Defender Kathryn Herold #40075 Supervising Deputy State Public Defender Boulder Regional Public Defenders 2555 55 <sup>TH</sup> Street D-200, Boulder, CO 80301 Phone: (303) 444-2322 Fax: (303) 449-6432 E-mail: boulder.defenders@state.co.us	Case No. <b>21CR497</b>  Division 13
<b>MR. ALISSA'S OBJECTION TO EXPANED MEDIA COVERAGE OF PRELIMINARY HEARING (D-014)</b>	

Ahmad Al Aliwi Alissa, by and through counsel, respectfully objects to the requests by any media outlet and/or their agents for expanded media coverage for the September 7, 2021 preliminary hearing in this matter and further objects to expanded media coverage at all future proceedings in this case.

1. Media outlets have requested this Court to authorize expanded media coverage to include video, audio, and still photography coverage of the preliminary hearing in this case scheduled for September 7, 2021.

2. In addition to the arguments set forth in the motion Mr. Alissa filed March 23, 2021 objecting to any and all expanded media coverage in this case, *see* Defense Motion D-012, Rule 2 of Chapter 38 of the Colorado Court Rules, Public Access to Records and Information specifically bars “[e]xpanded media coverage of pretrial hearings in criminal cases, except advisements and arraignments.”

3. Because the proceeding on September 7, 2021 is neither Mr. Alissa’s advisement nor an arraignment, the rule prohibits this Court from allowing expanded media coverage of the hearing.

4. Granting such a request would not only violate the rules governing expanded media coverage, but would jeopardize Mr. Alissa's constitutional rights to due process, a fair trial, to be presumed innocent, and to a fair and impartial jury. U.S. Const. amends. V, VI, VIII, XIV; Colo. Const. art. II, secs. 16, 18, 20, 23, 25; *see also Sheppard v. Maxwell*, 384 U.S. 333 (1966); *Estes v. Texas*, 381 U.S. 532 (1965); *People v. Botham*, 629 P.2d 589 (Colo. 1981).

5. Mr. Alissa therefore respectfully objects to any request by any media outlet and/or their agents for expanded media coverage for the September 7, 2021 preliminary hearing in this matter and further objects to expanded media coverage at all future proceedings in this case. Mr. Alissa further requests a hearing before any such request is granted. Mr. Alissa further requests a court order requiring thirty days' notice in advance of any hearing for which such future requests are made.

MEGAN A. RING  
COLORADO STATE PUBLIC DEFENDER



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Daniel King #26129  
Chief Trial Deputy State Public Defender



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Samuel Dunn #46901  
Senior Deputy State Public Defender



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Kathryn Herold #40075  
Supervising Deputy State Public Defender

**Certificate of Service**

I hereby certify that on August 31, 2021, I served the foregoing document through Colorado E Filing to all opposing counsel of record.

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Dated: August 31, 2021