

REDACTED

District Court, El Paso County, Colorado El Paso County Combined Courts 270 South Tejon Street, Colorado Springs CO 80903	DATE FILED: May 21, 2020 5:37 PM
THE PEOPLE OF THE STATE OF COLORADO, Plaintiff v. LETECIA STAUCH, Defendant	
MEGAN A. RING, Colorado State Public Defender Kathryn Strobel (No. 42850) Deputy State Public Defender 30 E Pikes Peak Ave Suite 200 Colorado Springs, Colorado 80903 C. Colette LeBeau (No. 43164) Deputy State Public Defender 132 W B St #200 Pueblo, CO 81003 Phone (720) 475-1235 Fax (719) 7475-1476 E-mail: Kathryn.strobel@coloradodefenders.us Colette.LeBeau@coloradodefenders.us	Case No. 20CR1358 Division 15S
D-12 Defense Supplement to D-10 and D-11	

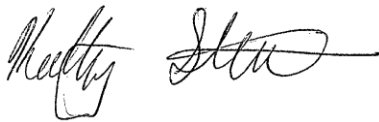
Letecia Stauch, through counsel, files this supplement to the previously filed D-10 and D-11, in order to update the court and the prosecution regarding the issues to be litigated on June 5, 2020.

1. Prior to May 4, 2020, the Colorado Springs Criminal Justice Center allowed one to two hours of visitation via remote video between Ms. Stauch and her counsel.
2. On May 4, 2020, The Colorado Springs Criminal Justice Center abruptly changed their policy and prohibited all remote video visitation for Ms. Stauch and all inmates with her security designation.
3. On May 12, 200, the defense filed D-10 and D-11, to request a continuance of the preliminary hearing and request that the court order the jail to allow visitation via video during the COVID-19 pandemic.
4. On May 18, 2020, the Colorado Springs Criminal Justice Center modified the prohibition regarding professional video visitation. The new policy, attached as Exhibit A to this supplement, allows for counsel to schedule remote video visitation with Ms. Stauch after 8:00 p.m.
5. On May 18, 2020, immediately after receiving the updated visitation policy, the defense team scheduled a meeting with Ms. Stauch via video at 8:00 p.m., and proceeded with a 90 minute professional video visit.

6. As the May 18, 2020 professional visitation policy now allows counsel to visit Ms. Stauch via remote video visitation during the COVID-19 pandemic, the defense acknowledges that D-11 is currently moot. The defense will work with the Colorado Springs Criminal Justice Center to schedule regular video visits with Ms. Stauch, and the defense hereby withdraws motion D-11. In the event that any complications arise that require future court intervention, an appropriate updated pleading will be filed.

Ms. Stauch files this motion, and makes all other motions and objections in this case, whether or not specifically noted at the time of making the motion or objection, on the following grounds and authorities: the Due Process Clause, the Right to a Fair Trial by an Impartial Jury, the Rights to Counsel, Equal Protection, Confrontation, and Compulsory Process, the Rights to Remain Silent and to Appeal, and the Right to be Free from Cruel and Unusual Punishment, pursuant to the Federal and Colorado Constitutions generally, and specifically, the First, Fourth, Fifth, Sixth, Eighth, Ninth, Tenth, and Fourteenth Amendments to the United States Constitutions, and Article II, sections 3, 6, 7, 10, 11, 16, 18, 20, 23, 25 and 28 of the Colorado Constitution.

RESPECTFULLY SUBMITTED,



/_____
Kathryn Strobel (No. 42850)
Deputy State Public Defender



/_____
C. Colette LeBeau (No. 43164)
Deputy State Public Defender

Dated: May 21, 2020

Certificate of Service

I hereby certify that on May 21, 2020, a true and correct copy of the motion was served via ICCES on all parties who appear of record and have entered their appearances herein according to ICCES.

/s/ Kathryn Strobel