

Redacted

DISTRICT COURT, El Paso County, Colorado Court Address: 270 South Tejon Street Colorado Springs, CO 80903	DATE FILED: April 6, 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-04]</b>  <b>People's Request for Unsealing of the Interception of Wire and Electronic Communications</b>	

The District Attorney of the Fourth Judicial District of the State of Colorado, through his duly appointed Deputy District Attorney, respectfully requests this Court enter an Order for the unsealing of the interception of wire and electronic communications, and as grounds, therefore state the following:

1. The Criminal Case Report supporting the Applications for the Interception of Wire and Electronic Communications for Subject Telephone One (ST-1) and Subject Telephone Two (ST-2) were initiated by El Paso County Sherriff's Office, Case Report Number: 20-1382.
2. On February 7, 2020, the Honorable Chief Judge William Bain, Fourth Judicial District, State of Colorado, entered an Order authorizing the interception of Subject Telephone One (ST-1). To avoid prejudice to the ongoing investigation, the Judge Bain ordered that the Affidavit, Application, the Order, and all interim reports filed with the Court for Subject Telephone One (ST-1) to be sealed until further Order of the Court, pursuant to Colorado Revised Statutes §16-15-102(8)(b), effective February 7, 2020.
3. On February 10, 2020, the Honorable Chief Judge William Bain, Fourth Judicial District, State of Colorado, entered an Order authorizing the interception Subject Telephone Two (ST-2). To avoid prejudice to the ongoing investigation, Judge Bain ordered that the Affidavit, Application, the Order, and all interim reports filed with the Court for Subject

Telephone Two (ST-2) to be sealed until further Order of the Court, pursuant to Colorado Revised Statutes §16-15-102(8)(b), effective February 10, 2020.

4. On March 11, 2020, the Complaint and Information was filed in El Paso County criminal case 20CR1358 involving Defendant Letecia Stauch. The Honorable District Court Judge Gregory Werner in Division 15 will continue to preside over the proceedings this case. At that court date, this Court ordered the People to release the sealed Arrest Warrant to the defense and ordered that the Arrest Warrant remain sealed until further order of this Court.
5. Pursuant to the orders to seal by Judge Bain on February 7, 2020, and on February 10, 2020, the People provided Judge Bain with additional items related to the interception of wire and electronic communications for the purpose of sealing on March 19, 2020. Judge Bain sealed the additional items provided by the People that same day.
6. Pursuant to Rule 16, all tapes and transcripts of any electronic surveillance (including wiretaps) of conversations involving the Defendant must be provided to the defense.
7. Further, the People recognize that the information contained in the applications for the interception of wire and electronic communications is also contained in the sealed Arrest Warrant. On April 3, 2020, this Court entered an Order authorizing the release of the Arrest Warrant in this case.
8. The People request that the items previously sealed by Judge Bain on February 7, 2020, February 10, 2020, and March 19, 2020, be unsealed to allow the People to release these items to the defense in discovery.

WHEREFORE, the People of the State of Colorado respectfully request the Court enter an ORDER unsealing the previously sealed documents from February 7, 2020, February 10, 2020, and March 19, 2020.

Respectfully submitted on April 7, 2020.

/s/ Michael 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 People's Request for Unsealing of the Interception of Wire and Electronic Communications was served via ICCES on all parties who appear of record and have entered their appearances herein according to ICCES:

Date: April 6, 2020

By: /s/ Sara Eldridge

Paralegal