

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: April 26, 2024 4:00 PM   σ COURT USE ONLY σ
Megan Ring, Colorado State Public Defender Kathryn Herold #40075 Supervising Deputy State Public Defender Samuel Dunn #46901 Deputy State Public Defender Boulder Regional Public Defenders 2555 55TH 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 MOTION FOR DISCOVERY RELATING TO EXPERTS AND OPINIONS (D-039)</b>	

AHMAD ALISSA, through counsel, moves this Court to order the prosecution to provide defense counsel, with the following materials and information.

1. The names and addresses of all witnesses the prosecution intends to qualify as experts;
2. The specific field of expertise about which the witness will testify;
3. All reports and statements, including oral statements made in connection with this particular case;
4. All documents, reports, and information on this case which the witness is considering in the formulation of expert opinion;
5. The formal education, technical training, experience and other factors which serve as a basis for the witness's qualification as an expert;
6. All books, manuals, articles, journals, reports, studies or other literature used or relied upon by the witness in the formulation of expert opinion in this case.
7. The names, addresses, and phone numbers of any witnesses the prosecution intends to elicit opinion testimony from of any kind.
8. The specific opinion testimony that the prosecution intends to attempt to elicit from any witness.

9. The basis for any opinion intended to be elicited.
10. A statement as to the prosecution's theory of how this expected testimony would be helpful to the jury's determination of a fact in issue.

As grounds, Mr. Alissa asserts the following:

- a) Such discovery is mandated or authorized by the Crim. P. Rule 16(I)(a)(1)(III) and (IV), (a)(2) and (d)(1).
- b) The requested discovery is discoverable, as it is relevant, potentially exculpatory and necessary to preparation of the defense. *Brady v. Maryland*, 373 U.S. 83 (1963); *Chambers v. People*, 682 P.2d 1173 (Colo. 1984), C.R.E. 701 and 702.
- c) Mr. Alissa will be denied rights of due process, confrontation and effective assistance of counsel under both the Colorado and United States Constitutions if the requested materials and information are not provided.

Wherefore, Mr. Alissa respectfully moves for an Order directing the prosecution to provide the above materials and information no later than sixty days prior to trial.

Mr. Alissa makes these arguments and motions, and all motions, requests and objections in this case, whether or not expressly stated at the time of the motion or objection, under the Due Process, Trial by Jury, Right to Counsel, Confrontation, Compulsory Process, Equal Protection Cruel and Unusual Punishment and Privilege Against Self Incrimination Clauses of the federal and Colorado Constitutions, and the Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments of the U.S. Constitution, and Art. II, §§ 3,6,7,8,16,18,20,23 and 25 of Colorado's Constitution.

MEGAN A. RING  
COLORADO STATE PUBLIC DEFENDER



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Kathryn Herold #40075  
Supervising Deputy State Public Defender



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Samuel Dunn #46901  
Deputy State Public Defender

**Certificate of Service**

I hereby certify that on \_\_\_April  
26\_\_\_\_\_, 2024, I served the foregoing  
document through Colorado E filing to all  
opposing counsel of record.

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KH

Dated: April 24, 2024



