

District Court, Boulder County, Colorado Court Address: 1776 6 th Avenue Boulder, CO 80306	
THE PEOPLE OF THE STATE OF COLORADO v. AHMAD AL ALIWI ALISSA 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. 21CR497 Division 13
MR. ALISSA'S MOTION FOR SPECIFICATION OF PHYSICAL EVIDENCE AND A LISTING OF TRIAL EXHIBITS THAT THE GOVERNMENT INTENDS TO INTRODUCE AT TRIAL (D-048)	

AHMAD ALISSA, through counsel moves this Court for an order directing the prosecution to specify at least 35 days in advance of trial, with particularity, what items of physical evidence and/or exhibits they intend to introduce at trial. Mr. Alissa states the following to support this motion:

1. In order to render effective assistance of counsel to Mr. Alissa, counsel must be completely prepared for the introduction into evidence of every single item held by the government as evidence. *See Strickland v. Washington*, 466 U.S. 668 (1984).
2. Mr. Alissa has federal and state constitutional rights to prepare a defense which he cannot do unless he knows which items of physical evidence the government intends to use. U.S. Const. amends. V, VI, XIV; Colo. Const. art. II, §§16, 25. Thus, he requests this Court order the government to provide to him a list specifying the items, and their purported relevance to the charges, as soon as possible, but no later than thirty five days before trial.
3. After receiving this list, the defense can file motions in limine and litigate issues of admissibility outside the presence of the jury. This procedure minimizes delays for the jury. This case is already set for a month long trial. Mr. Alissa predicts that the evidence in this case, and the list of exhibits, will be extensive. Judicial economy is served by requiring the government to provide defense with specification of physical evidence and a listing of trial exhibits prior to trial.
4. Mr. Alissa requests a hearing on this motion.

Mr. Alissa makes these arguments and motions, and all motions 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



Kathryn Herold #40075
Supervising Deputy State Public Defender



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.

KH

Dated: April 24, 2024

