District Court, Boulder County, Colorado Court Address: 1776 6 <sup>th</sup> Avenue Boulder, CO 80306	
THE PEOPLE OF THE STATE OF COLORADO	DATE FILED: April 26, 2024 4:00 PM
v.	
AHMAD AL ALIWI ALISSA Defendant.	
Defendant.	σ COURT USE ONLY σ
Megan Ring, Colorado State Public Defender Kathryn Herold #40075	Case No. <b>21CR497</b>
Supervising Deputy State Public Defender Samuel Dunn #46901	Division 13
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	

## MR. ALISSA'S MOTION OBJECTING TO WRITTEN QUESTIONS BY JURORS DURING HIS TRIAL (D-037)

AHMAD ALISSA, by and through counsel, objects to the submission of juror questions at his trial. As grounds in support of this objection, Mr. Alissa states the following:

- 1. On March 22, 2021 Mr. Alissa drove to the King Soopers in Boulder, from his home in Arvada, and shot and killed ten people, including a Boulder Police Officer. Mr. Alissa is charged with a hundred and fifteen separate counts, including ten counts of first degree murder.
- 2. On November 14, 2023 Mr. Alissa entered a not guilty by reason of insanity plea. A month long trial is set to commence on August 5, 2024.
- 3. Pursuant to Colo. R. Crim. P. 24(g), the Court is vested with the discretion to prohibit or limit questioning based on "the severity of the charges." The Court is further vested with the discretion to prohibit or limit questioning based on "the presence of significant suppressed evidence or for good cause." *Id.*
- 4. The complexities of this case are like no other in our jurisdiction. That said, Judges within the 20<sup>th</sup> Judicial District routinely use their discretion to prohibit jury questions during trial. Mr. Alissa is requesting this Court use that discretion and prohibit jury questions during his trial.
- 5. If this Court is not going to grant this motion on its face, Mr. Alissa requests a hearing.

WHEREFORE, Mr. Alissa requests this Court prohibit any questions by jurors during his trial. 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

SAHRYL FOOD

Kathryn Herold #40075 Supervising Deputy State Public Defender

Samuel Dunn #46901 Deputy State Public Defender

Dated: April 23, 2024

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\_