

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 TO SEQUESTER THE JURY (D-047)</b>	

AHMAD ALISSA, through counsel, moves this Court to sequester the jury that will be hearing this case. In support of this motion, Mr. Alissa states the following:

1. Mr. Alissa is charged with one hundred and fifteen counts. Ten of those charges are for first degree murder, including first degree murder of a police officer.
2. Mr. Alissa has plead not guilty by reason of insanity.
3. This case has a tremendous impact on the Boulder community and surrounding communities. There has been and continues to be a significant amount of media coverage. Mr. Alissa anticipates that media coverage to continue throughout his trial.
4. Mr. Alissa's trial is set for one month, including jury selection.
5. Colo. R. Crim. P. 24(f) gives the Court discretion to sequester jurors in extraordinary cases. This is an extraordinary case.
6. Sequestration is the only way of ensuring that the jurors will not be affected by media or other improper outside influences, that their judgments and verdicts are solely their own, and that they can remain safe. *See e.g., People v. Vilapando*, 809 P.2d 1082 (Colo.App.1990).
7. Mr. Alissa's rights to due process, to effective assistance of counsel, to appeal and to a fair trial by impartial jury all require the requested relief. U.S. Const. amends. V, VI, VIII, XIV; Colo. Const. art. II, secs. 16, 18, 20, 23 and 25.

8. Mr. Alissa moves for 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



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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.

\_\_\_\_\_  
KH

Dated: April 24, 2024





