REDACTED

DATE FILED: March 2, 2020

DATE FILED: March 02, 2020 DISTRICT COURT, EL PASO COUNTY, COLORADO 270 South Tejon Street Colorado Springs, Colorado 80903 PEOPLE OF THE STATE OF COLORADO. Plaintiff v. LETECIA STAUCH, σ COURT USE ONLY σ Defendant MEGAN A. RING, Colorado State Public Defender Case No. 20CR1358 Kathryn Strobel (No. 42850) Deputy State Public Defender 30 East Pikes Peak Avenue, Suite 200 Colorado Springs, Colorado 80903 Phone: (719) 475-1235 Fax: (719) 475-1476 Email: springs.pubdef@coloradodefenders.us Division 5

NOTICE OF INVOCATION OF ALL STATUTORY, CASE LAW, AND CONSTITUTIONAL PRIVILEGES

- 1. Defendant, by and through counsel, the Office of the Public Defender, hereby notifies the District Attorney's Office and/or all law enforcement agencies of its intent to specifically invoke the following privileges:
- a. All medical and psychiatric, including drug or alcohol treatment, privileges afforded to Defendant under the Colorado and United States Constitutions and Section 13-90-107 of the Colorado Revised Statutes as to all medical and/or psychiatric treatment Defendant has ever received.
- b. All privileges in school, military, probation, prison, social services, or any other records in which Defendant has a confidentiality expectation through Federal and State statutes and case law, administrative regulations or rules, or Federal and State constitutional provisions, as well as these agencies' own statements to Defendant, either oral or written.
- 2. Defendant requests that this Court specifically order that no member of the Office of the District Attorney, law enforcement, Department of Human Services, or any person or agency specified in Rule 16(I)(a)(3) of the Colorado Rules of Criminal Procedure or their respective agents attempt to obtain confidential information pertaining to Defendant. This includes records of treatment for drug and/or alcohol addiction and any confidential military records.



behalf. Defendant does not authorize <u>any</u>	v person to waive said privileges on Defendant's
Kathryn Strobel (No. 42850) Deputy State Public Defender Dated: March 2, 2020	Certificate of Service Electronically filed by, Tamara Bailey-McIntosh