

District Court, El Paso County, Colorado 270 South Tejon Street, Colorado Springs, CO 80903	DATE FILED: March 20, 2020
THE PEOPLE OF THE STATE OF COLORADO vs. LETECIA STAUCH , Defendant	<input type="checkbox"/> COURT USE ONLY <input type="checkbox"/>
Daniel H. May Fourth Judicial District District Attorney, # 11379 El Paso County District Attorneys Office 105 E. Vermijo Avenue Colorado Springs, CO 80903 Phone Number: 719-520-6000 Fax: 719-520-6172	Case No: D0212020CR001358 Div: 15 Courtroom:
AMENDED COMPLAINT AND INFORMATION	

CHARGES: 13

COUNT 1: MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(a) (F1){01011}

COUNT 2: MURDER IN THE FIRST DEGREE, C.R.S. 18-3-102(1)(f) (F1){01018}

COUNT 3: CHILD ABUSE RESULTING IN DEATH, C.R.S. 18-6-401(1)(a),(7)(a)(I) (F2){17019}

COUNT 4: TAMPERING WITH A DECEASED HUMAN BODY, C.R.S. 18-8-610.5 (F3){26065}

COUNT 5: TAMPERING WITH PHYSICAL EVIDENCE, C.R.S. 18-8-610(1)(a) (F6){26062}

COUNT 6: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(A) (SE){36091}

COUNT 7: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(A) (SE){36091}

COUNT 8: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(A) (SE){36091}

COUNT 9: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(B) (SE){36092}

COUNT 10: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(A) (SE){36091}

COUNT 11: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(A) (SE){36091}

COUNT 12: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(A) (SE){36091}

COUNT 13: CRIME OF VIOLENCE, C.R.S. 18-1.3-406(2)(a)(I)(B) (SE){36092}

Daniel H. May, District Attorney for the Fourth Judicial District, of the State of Colorado, in the name and by the authority of the People of the State of Colorado, informs the court of the following offenses committed, or triable, in the County of El Paso:

COUNT 1-MURDER IN THE FIRST DEGREE (F1)

On or about January 27, 2020, Letecia Stauch unlawfully, feloniously, after deliberation, and with the intent to cause the death of a person other than herself, caused the death of Gannon Stauch; in violation of section 18-3-102(1)(a), C.R.S.

COUNT 2-MURDER IN THE FIRST DEGREE (F1)

On or about January 27, 2020, Letecia Stauch unlawfully, feloniously, and knowingly caused the death of Gannon Stauch, a child who had not yet attained twelve years of age, and the defendant was in a position of trust with respect to the victim; in violation of section 18-3-102(1)(f), C.R.S.

COUNT 3-CHILD ABUSE RESULTING IN DEATH (F2)

On or about January 27, 2020, Letecia Stauch unlawfully, feloniously, knowingly, or recklessly caused an injury to, or permitted to be unreasonably placed in a situation that posed a threat of injury to, the life or health of a child, namely: Gannon Stauch, and engaged in a continued pattern of conduct that resulted in cruel punishment, mistreatment, or an accumulation of injuries, that resulted in the death of the child; in violation of section 18-6-401(1)(a),(7)(a)(I), C.R.S.

COUNT 4-TAMPERING WITH A DECEASED HUMAN BODY (F3)

On or about January 27, 2020, Letecia Stauch, believing that an official proceeding was pending, in progress, or about to be instituted, and acting without legal right or authority, unlawfully and feloniously willfully destroyed, mutilated, concealed, removed, or altered a human body, part of a human body, or human remains with intent to impair its or their appearance or availability in the official proceedings; in violation of section 18-8-610.5, C.R.S.

COUNT 5-TAMPERING WITH PHYSICAL EVIDENCE (F6)

On or about January 27, 2020, Letecia Stauch, believing that an official proceeding was pending or about to be instituted, and acting without legal right or authority, unlawfully and feloniously destroyed, mutilated, concealed, removed, or altered physical evidence with intent to impair its verity or availability in the pending or prospective official proceeding; in violation of section 18-8-610(1)(a), C.R.S.

COUNT 6-CRIME OF VIOLENCE (SE)

On or about January 27, 2020, Letecia Stauch unlawfully used, or possessed and threatened the use of, a deadly weapon, namely: firearm, during the commission of, attempted commission of, conspiracy to commit, or the immediate flight from, the offense of Murder in the First Degree - After Deliberation, as charged in count 1; in violation of section 18-1.3-406(2)(a)(I)(A), C.R.S.

COUNT 7-CRIME OF VIOLENCE (SE)

On or about January 27, 2020, Letecia Stauch unlawfully used, or possessed and threatened the use of, a deadly weapon, namely: Blunt Instrument, during the commission of, attempted commission of, conspiracy to commit, or the immediate flight from, the offense of Murder in the First Degree - After Deliberation, as charged in count 1; in violation of section 18-1.3-406(2)(a)(I)(A), C.R.S.

COUNT 8-CRIME OF VIOLENCE (SE)

On or about January 27, 2020, Letecia Stauch unlawfully used, or possessed and threatened the use of, a deadly weapon, namely: Knife or other sharp instrument, during the commission of, attempted commission of, conspiracy to commit, or the immediate flight from, the offense of Murder in the First Degree - After Deliberation, as charged in count 1; in violation of section 18-1.3-406(2)(a)(I)(A), C.R.S.

COUNT 9-CRIME OF VIOLENCE (SE)

On or about January 27, 2020, Letecia Stauch, during the commission, attempted commission of, conspiracy to commit, or immediate flight from the crime of Murder in the First Degree - After Deliberation, as charged in count 1, unlawfully caused the death of Gannon Stauch, a person not a participant in the crime; in violation of section 18-1.3-406(2)(a)(I)(B), C.R.S.

COUNT 10-CRIME OF VIOLENCE (SE)

On or about January 27, 2020, Letecia Stauch unlawfully used, or possessed and threatened the use of, a deadly weapon, namely: Firearm, during the commission of, attempted commission of, conspiracy to commit, or the immediate flight from, the offense of Murder in the First Degree - Child Under 12 Years of Age, as charged in count 2; in violation of section 18-1.3-406(2)(a)(I)(A), C.R.S.

COUNT 11-CRIME OF VIOLENCE (SE)

On or about January 27, 2020, Letecia Stauch unlawfully used, or possessed and threatened the use of, a deadly weapon, namely: Blunt Instrument, during the commission of, attempted commission of, conspiracy to commit, or the immediate flight from, the offense of Murder in the First Degree - Child Under 12 Years of Age, as charged in count 2; in violation of section 18-1.3-406(2)(a)(I)(A), C.R.S.

COUNT 12-CRIME OF VIOLENCE (SE)

On or about January 27, 2020, Letecia Stauch unlawfully used, or possessed and threatened the use of, a deadly weapon, namely: Knife or Other Sharp Instrument, during the commission of, attempted commission of, conspiracy to commit, or the immediate flight from, the offense of Murder in the First Degree - Child Under 12 Years of Age, as charged in count 2; in violation of section 18-1.3-406(2)(a)(I)(A), C.R.S.

COUNT 13-CRIME OF VIOLENCE (SE)

On or about January 27, 2020, Letecia Stauch, during the commission, attempted commission of, conspiracy to commit, or immediate flight from the crime of Murder in the First Degree - Child Under 12 Years of Age, as charged in count 2, unlawfully caused the death of Gannon Stauch, a person not a participant in the crime; in violation of section 18-1.3-406(2)(a)(I)(B), C.R.S.

All offenses against the peace and dignity of the people of the State of Colorado.

Daniel H. May
District Attorney, # 11379

By: /s/ Michael Allen Date: 3/20/2020
Michael Allen #: 42955
Senior Deputy District Attorney