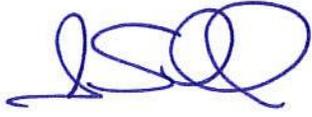


DISTRICT COURT, TELLER COUNTY, COLORADO 101 West Bennett Avenue Post Office Box 997 Cripple Creek, Colorado 80813	
PEOPLE OF THE STATE OF COLORADO, Plaintiff v. PATRICK FRAZEE, Defendant	o COURT USE ONLY σ
MEGAN A. RING, Colorado State Public Defender Adam P. Steigerwald (No. 40092) Deputy State Public Defender 19 North Tejon, Suite 105 Colorado Springs, Colorado 80903 Phone: (719) 475-1235 Fax: (719) 475-1476 Email: springs@coloradodefenders.us	Case No. 18CR0330 Division 11
DEFENSE RESPONSE TO PEOPLE'S MOTION TO RESCIND UNSEALING OF ARREST WARRANT [D-006]	

Mr. Frazee, by and through counsel, requests the Court not to reconsider its decision to release the Probable Cause Affidavit pursuant to a protection order restricting access of the PC Affidavit to counsel and investigators representing Mr. Frazee. In support of this request, counsel states the following:

1. In court, defense counsel suggested that a protection order be put in place. The prosecution did not object and the Court ordered its release pursuant to the protection order proposed by the defense.
2. The Prosecution, in its Motion, have given no information explaining how Counsel receiving a Probable Cause Affidavit with a protection order in place jeopardizes the investigation. Undersigned counsel is an officer of the court. Probable Cause Affidavits have been released in any number of cases under seal to this Counsel and members of the Public Defenders Office without investigations being jeopardized.
3. Mr. Frazee has a right to discovery under Rule 16 that entitles him to receipt of information, amongst other deadlines, *as soon as practicable*. Counsel will abide by all orders of the court, will not disseminate the information contained therein, and will not jeopardize any ongoing investigation. There is no reason to keep the Probable Cause Affidavit from counsel at this time.

WHEREFORE, Counsel requests the Court issue a protection order and unseal the Probable Cause Affidavit as it relates to counsel.

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke at the bottom.

Adam Payne Steigerwald, #40092
Colorado Springs Public Defenders
December 21, 2018