

<p><b>COUNTY COURT, COSTILLA COUNTY, STATE OF COLORADO</b></p> <p>Court Address:  Costilla County Courthouse  304 Main Street, P.O  San Luis, CO. 811520000</p>	<p style="text-align: center;">DATE FILED  April 1, 2026 4:36 PM</p> <p style="text-align: center;"><b>COURT USE ONLY</b></p>
<p><b>Plaintiff: THE PEOPLE OF THE STATE OF COLORADO</b></p> <p>v.</p> <p><b>Defendant: CRUZ SOTO</b></p>	
<p><i>Attorney for Defendant:</i></p> <p>Mallory A. Revel, Reg. #45662  Foster Graham Milstein &amp; Calisher, LLP  360 S. Garfield Street, 6<sup>th</sup> Floor  Denver, Colorado 80209  Phone: (303) 333-9810  Fax: (303) 333-9786  Email: <a href="mailto:mrevel@fostergraham.com">mrevel@fostergraham.com</a></p>	<p>Case No.: 26M504</p> <p>Division: WW</p> <p>Courtroom: WW</p>
<p><b>ENTRY OF APPEARANCE AND MOTION FOR DISCOVERY</b></p>	

**COMES NOW** the law firm of Foster Graham Milstein & Calisher, LLP, and hereby enters its appearance as counsel of record for Defendant Cruz Soto in the above-referenced case.

Additionally, Mr. Soto, by and through his attorneys, also requests that this Honorable Court require disclosure by the Prosecution as soon as possible of the following categories of material or information and to require the Prosecution to obtain, preserve and disclose the same categories of material and information which may be in the possession or control of any other governmental personnel:

1. The names and addresses of all persons the Prosecution intends to call as witnesses, together with their relevant written or recorded statements and/or any relevant written or recorded statements of endorsed witnesses whose testimony will be introduced as hearsay.
2. The police, arrest, offense, and/or incident reports, including statements (whether oral or written) of all witnesses and Mr. Soto.
3. All reports by any law enforcement officials in relation to statements made by Mr. Soto.

4. Any reports or statements of experts made in connection with this particular case, including results of physical, medical or mental examinations and scientific tests, experiments or comparisons.

5. Any books, papers, documents, photographs, electronic recordings, computer files and disks, or tangible objects held as evidence in this case or otherwise relating to this case.

6. Any record of prior criminal convictions for Mr. Soto and/or any person the Prosecution intends to call as a witness in the case, including the alleged victim.

7. All tapes and transcripts of any electronic surveillance (including video surveillance) of conversations involving Mr. Soto or any witness in this case, and/or other tapes and transcripts.

8. Any and all audio or video recordings existing in relation to this matter, including body-camera audio/video, 911 tapes, audio/video recordings on the person of any involved law enforcement officer, any dash camera or other audio/video recordings from law enforcement vehicles involved in this matter, and any other audio/video recordings shared with law enforcement by any person in relation to this matter.

9. Records of prior calls for services to the involved location(s) or in relation to the parties and witnesses to the related events.

10. Cell phone ping or any cell phone, GPS, or other location data gathered in relation to the parties, witnesses, or events pertaining to this matter.

11. HALO video or other similar camera footage available in relation to the events involved in this matter.

12. Any information or media accessed or available through security systems such as FLOCK or related systems.

13. Disclosure of any related correspondence within any and all involved law enforcement or investigatory bodies including any task forces, including through CAD systems such as VERSADEx or related systems, and all related correspondence between those law enforcement bodies and the District Attorney pertaining to this matter.

14. All material or information in whatever form that tends to negate Mr. Soto's guilt as to the offense charged or would tend to reduce the punishment therefore.

WHEREFORE, Mr. Soto respectfully requests this Court to require the Prosecution to provide the foregoing requested documents as soon as possible.

Respectfully submitted this 1<sup>st</sup> day of April, 2026.

**FOSTER, GRAHAM, MILSTEIN & CALISHER, LLP**

By: /s/ Mallory Revel

Mallory A. Revel, Reg. #45662

**ATTORNEY FOR MR. SOTO**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 1<sup>st</sup> day of April, 2026, a true and correct copy of the foregoing **ENTRY OF APPEARANCE AND MOTION FOR DISCOVERY** was served via Denver County Court E-File to the following:

12<sup>th</sup> Judicial District Attorney's Office  
601 Main Street  
Alamosa, CO 81101

/s/ Melah Garwood

Melah Garwood