

<input type="checkbox"/> County Court <input checked="" type="checkbox"/> District Court Costilla County, State of Colorado 304 Main Street San Luis, CO 81152	DATE FILED April 23, 2026 9:32 AM
<b>PEOPLE OF THE STATE OF COLORADO</b> v. <b>DANNY ROBERT SANCHEZ</b> AKA: Defendant	▲ COURT USE ONLY ▲
Anne E Kelly, District Attorney John Zachary, Deputy District Attorney Office of the District Attorney 601 Main Street Alamosa, CO 81101 Phone Number: (719) 589-3691 Attorney Reg. 38885	Case No. D0122026CR000503  Div:  Ctrm:
<b>MOTION FOR AUTHORIZATION TO RELEASE GRAND JURY TRANSCRIPTS  AND EXHIBITS</b>	

Anne Kelly, District Attorney in and for the Twelfth Judicial District, by and through the undersigned Assistant District Attorney for the people of the State of Colorado, pursuant to Rule 6.9 of the Colorado Rules of Criminal Procedure, hereby move this Honorable Court for an order authorizing the release of Grand Jury transcripts and exhibits to: defendant's attorney Mallory Revel.

1. On March 26, 2026, the Defendant was indicted by a grand jury for the charges in the above styled case.
2. During the course of the grand jury investigation, witnesses testified and exhibits were presented to the grand jury.
3. The grand jury returned a true bill. The indictments were presented to the court by the prosecutors under instructions of the grand jury pursuant to Rule 6.6(a).
4. Release of the transcripts and exhibits is necessary in order to provide full discovery to the defendants. Counsel for the indicted defendants need the materials in order to prepare for trial in these criminal actions.
5. Rule 6.4 of the Colorado Rules of Criminal Procedure, pertaining to the reporting of grand jury proceedings, provides that, "[t]he reporter's notes and any transcripts which may be prepared shall be preserved, sealed, and filed with the court. No release or destruction of the notes or transcripts shall occur without prior court approval".

6. Rule 6.9(a) of the Colorado Rules of Criminal Procedure provides that, "upon application by the prosecutor, the court, for good cause, may enter an order to furnish to the prosecutor transcripts of grand jury testimony, minutes, reports, or exhibits relating to them".

7. Rule 6.9(c) of the Colorado Rules of Criminal Procedure provides, in relevant part, that an order to furnish transcripts of grand jury testimony and exhibits shall specify the person or persons who may be granted access to such materials upon release.

8. Rule 6.9(c) also provides, "[such] order shall also provide that the release of such material shall not be made by the clerk of the court until the filing of an oath of affirmation of the acceptance by the person receiving such material of the restrictions and limitations which are specified by the court under this paragraph."

9. The People ask that the Court specify it is granting the defendant, defendant's counsel, investigator access to the Grand Jury transcripts and exhibits. The People request the Court enter specific orders that the transcripts and exhibits be maintained by defense counsel and copies not be made or given out to the Defendant or outside parties and that the materials only be used as it relates to the defense/prosecution of Defendant's case. The People further request and order that the materials obtained by the Defendant or counsel be destroyed in the normal course of file maintenance or returned to the District Attorney's Office.

10. The District Attorney in complying with Rule 6.9(c) hereby verifies and affirms that in accepting the transcripts we will comply with any restrictions and limitations imposed by the court.

OATH OF AFFIRMATION

I, Mallory Revel, being of sound mind and lawful age do swear and affirm that upon acceptance of the grand jury transcripts, the District Attorney's Office will comply with any limitations and restrictions imposed by the court.

Subscribed and sworn before me this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

My Commission Expires

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\_\_\_\_\_  
City and County of  
State of Colorado

WHEREFORE, the People respectfully request that this Honorable Court issue an Order authorizing the release of the Grand Jury transcripts related to the Caleb Sanchez proceedings in the above styled case to counsel for the indicted defendant. Additionally, the District Attorney would request that this Honorable Court accept the above notarized oath and affirmation as complying with Rule 6.9.

Respectfully submitted,  
ANNE E. KELLY  
DISTRICT ATTORNEY

/s/Anne Kelly  
Reg#38885  
District Attorney  
April 14, 2026.