

<p>COMBINED COURTS, COSTILLA COUNTY, COLORADO</p> <p>Court Address: 304 Main Street, PO Box 301, San Luis, Colorado 81152</p> <hr/> <p><b>Plaintiff: The People of the State of Colorado</b></p> <p>vs.</p> <p><b>Defendant: Caleb Sanchez</b></p> <hr/> <p>Attorney for Defendant: Donald F. Cutler, IV, Reg. #32739 Cutler Law Office, LLC 329 West Highway 50 P.O. Box 743 Salida, Colorado 81201 Phone No.: (719) 539-5017 E-Mail: <a href="mailto:office@cutlerlaw.org">office@cutlerlaw.org</a></p>	<p>DATE FILED April 14, 2026 9:41 AM</p> <hr/> <p>Case Number: <b>26CR505</b></p> <p>Div.:                      Ctrm.:</p>
<p><b>REQUEST FOR DISCOVERY</b></p>	

COMES NOW the Defendant, by and through counsel, and hereby makes demand on the District Attorney to comply with her obligations under C.R.Crim.P. Rule 16 Part I(a)(I), (IV), (VII) and (VIII) as soon as practicable. The Defendant hereby provides notice to the District Attorney of his request and demand to immediately provide the Defendant with a duplicate of the following pursuant to C.R.Crim.P. Rule 16, the Fifth, Sixth and Fourteenth Amendments to the United States Constitution, and pursuant to Article II, Sections 16 and 25 of the Colorado Constitution.

- 1.) Any police, arrest, incident, supplement or other crime or offense reports, including witness and alleged victim names, addresses and telephone numbers relating to this case. C.R.Crim.P. Rule 16(I)(a)(1).
- 2.) All statements made by the Defendant and all statements made by any other witnesses to the prosecution or to law enforcement officials, investigators or agents. This request includes any typed or handwritten notes, and any transcriptions of such statements. This request also includes any promise, benefit, or other inducement made by the government or its agents to any witness, prospective witness or other person in exchange for such person's testimony or aid in this case. C.R.Crim.P. Rule 16(I)(a)(1).
- 3.) All statements made by the Defendant and all statements made by any other witness to the prosecution or law enforcement officials, investigators or agents which have not been previously reduced to writing. C.R.Crim.P. Rule 16(I)(a)(1).

4.) Current NCIC and CCIC records for the Defendant, and for any person the prosecution intends to call as a witness in this case, to include law enforcement personnel and agents. Current penitentiary packets, certified driving histories, vehicle registration information sheets, NCIC/CCIC or dispatch queries or the like are specifically included in this request. These records should include the dispositions, including the sentence, for each case in which an arrest is indicated. This request includes all records reflecting any juvenile or adult arrests, adjudications, convictions, deferred adjudications, deferred prosecutions, deferred judgments and sentences, pending cases or petitions in delinquency against such persons. This request also includes any information or documentation reflecting payment, dismissal of charges, reduction of charges, or any other consideration or benefit received as compensation for work as a confidential informant in this or any other case, or other work or investigative role performed by any person the prosecution intends to call as a witness in this case. C.R.Crim.P. Rule 16(I)(a)(V).

5.) Any material or information in possession or control of the prosecution which tends to negate the guilt of the accused, or to support the innocence of the accused, as to the offense charged or would tend to reduce the punishment therefore. Any disciplinary reports, personnel reports or other such records which may exhibit bias or prejudice, or impugn the integrity or reflect upon the professional judgment of any member of law enforcement involved in this case. This request also includes any statements made by witnesses, co-defendants, or by alleged victims to the prosecution or to law enforcement and its agents. C.R.Crim.P. Rule 16(I)(a)(2); Brady v. Maryland, 373 U.S. 83 (1963).

6.) Any reports or statements of any experts, scientific or otherwise, made in connection with this case including the results of physical or mental examinations and of scientific tests, experiments, measurements or comparisons, including any refusals to analyze or returns to the requesting agency of any nature. Any books, articles, manuals or other information upon which any expert witness intends to rely for the basis of his or her opinions concerning such tests, experiments, examinations or analyses. C.R.Crim.P. Rule 16(I)(a)(1).

7.) Any books, papers, documents, photographs, video recordings, audio recordings, electronic mail communications, text messages, instant messages, voice messages, chat room dialogues, "facebook" correspondence, blog or other social network website entries, or other tangible objects collected by law enforcement, available or held as evidence in this case. This request specifically includes reprints of any photographs, including duplicates of any altered, enlarged or manipulated photograph or video, copies of any administrative or regulatory hearing recordings, and copies of any 911 calls, dispatch calls and logs, booking video and audio recordings, or any other audio or video tapes held or available as evidence by the prosecution, law enforcement, or its agencies pertaining to this case. C.R.Crim.P. Rule 16(I)(a)(1).

8.) The material and information requested in this motion includes all materials and information in the possession or control of the District Attorney, members of his staff, and any others who have participated in the investigation or evaluation of this case, and

who either regularly report, cooperate in investigative efforts with, provide information regularly to, or have reported to the District Attorney in this case. C.R.Crim.P. Rule 16(I)(a)(3).

9.) Any written or recorded statements of the accused or of a co-defendant, and the substance of any oral statements made to the police, law enforcement agents or assisting agencies, or the prosecution by the accused or by a co-defendant. C.R.Crim.P. Rule 16(I)(1)(VIII).

10.) Any and all samples of breath or bodily fluid retained by any person or law enforcement agency, or agent acting in concert therewith, which were used to determine the blood, breath or urine alcohol or drug content of the accused. Any and all biological samples collected by any person or law enforcement agency, or laboratory technician which were used to determine genetic coding information, identity, or blood typing.

11.) Copies of any documents relating to the operation, calibration or certification of any measurement or testing instrument used in this case, including but not limited to, instrument certificates, certification test records, standard solution log sheets, gas chromatograph-mass spectrometer records, laboratory protocols, intoxilyzer repair and maintenance records, gas chromatograph-mass spectrometer repair and maintenance records, operator or operator/instructor certificates and re-certification records, preliminary breath testing device calibrations or certificates. Also, copies of any certifications held by the individual(s) conducting any such measurement or testing, whether specific to the instrument or methodology used.

12.) Any advisement, written or recorded, from law enforcement purporting to advise the Defendant of certain constitutional rights as required by Miranda v. Arizona, 384 U.S. 436 (1966).

13.) Any record of prior felony convictions, including case report documentation, court judgment of conviction records, of persons to be called as witnesses for the prosecution.

14.) Any record of District Attorney's "no file" decisions, or pre-charging dismissals regarding prior arrests or prosecutions of the Defendant.

15.) Any records regarding any prosecution witness's prior service as a confidential informant, agent or implement of law enforcement investigation, including any compensation or benefit conveyed for such service.

16.) Any prior or current intelligence, reconnaissance, or surveillance records or information gathered by law enforcement and its agents, in association with or relevant to the investigation, arrest or prosecution of the Defendant.

17.) If the People intend to introduce DNA, RNA, mtDNA, or any other genetic evidence the following:

- a. Photographic quality duplicates of test strips, gels, and color printouts of STR computer results.
- b. Copies of reports, and CV, of all persons examining the evidence.
- c. The complete, including laboratory notes, lab file, including, but not limited to the following:
  - i. Official request for lab examination and any and all supporting documentation regarding the offense.
  - ii. Submission letter from the submitting law enforcement agency.
  - iii. Lab reports and all bench notes.
  - iv. Photographs of test strips.
  - v. Photographs of quantitation gels.
  - vi. Photographs of D1S80 gels.
  - vii. Well Lane assignment chart.
  - viii. DNA summary.
  - ix. Quantiblot chart.
  - x. Serologist's item number, description, and presumptive testing chart.
  - xi. Amplification data sheet.
  - xii. Biological analysis/summary.
  - xiii. CBI sexual assault kit analysis chart.
  - xiv. All batch and lot information regarding primers and reagents.
  - xv. Computer printouts of STR graphs and charts, and injection information.
  - xvi. Frequencies computation sheet.

18.) If, subsequent to compliance with these standards or requests or orders pursuant thereto, a party discovers additional material or information which is subject to disclosure, the party shall promptly notify the other party or the other party's counsel of the existence of such additional material, and if the additional material or information is discovered during trial, the Court shall also be notified. C.R.Crim.P. Rule 16(III)(b).

Date: April 13, 2026

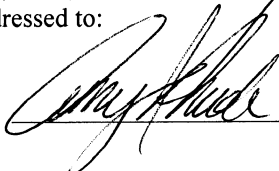
Respectfully submitted,

  
Donald F. Cutler, IV

CERTIFICATE OF SERVICE

I hereby certify that I have this 14 day of April, 2026, delivered a true and correct copy of the foregoing Motion by electronic service via CCE, addressed to:

Anne Kelly, Esq.  
District Attorney

  
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