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| COUNTY COURT, JEFFERSON COUNTY, COLORADO 100 Jefferson County Pkwy Golden, Colorado 80401 | <p>DATE FILED December 7, 2022 6:21 PM FILING ID: B29A7C63DDA78 CASE NUMBER: 2022CR3360</p> <p>▲COURT USE ONLY▲</p> |
| <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>DESIREE GONZALEZ, <i>Defendant.</i></p> | |
| <p><i>Attorney for Defendant:</i> BAUMGARTNER LAW, LLC S. Birk Baumgartner, #47829 Daniel C. Mossinghoff, #31923 300 East Hampden Ave., Suite 401 Englewood, Colorado 80113 Phone Number: (303) 529-3476 E-mail: Birk@BaumgartnerLaw.com Daniel@BaumgartnerLaw.com</p> | <p>Case Number: 2022CR3360</p> <p>Div/Ctrm.: W</p> |
| <p align="center">ENTRY OF APPEARANCE AND REQUEST FOR DISCOVERY</p> | |

1. PLEASE TAKE NOTICE that undersigned counsel, S. Birk Baumgartner and Daniel C. Mossinghoff, of BAUMGARTNER LAW, LLC hereby enter their appearance on behalf of the Defendant, Desiree Gonzalez, in this matter.

2. Defendant hereby requests discovery of any and all relevant information pertaining to the above captioned case, including, but not limited to, the following:

- Any and all police reports, supplemental reports or the like made in conjunction with this case;
- The dispatch records for the police officers involved in the incident;
- Any and all police dispatch logs pertaining to the Defendant;
- Any and all pre-booking, booking, or post-booking reports or supplements regarding this Defendant;
- Any and all citations or tickets issued in this matter;
- Any and all statements, oral, written or otherwise recorded or preserved in any manner, attested to, signed by or not, alleged to have been made by the Defendant to any person at any time regarding the facts or circumstances of this case;

- Any and all names, addresses and phone numbers of any persons who may be called to testify against Defendant at trial or any other hearing on issues related to this case;
- Any and all statements made by any of the aforementioned witnesses, oral or written, recorded in any manner, attested to or signed or not by them;
- Any and all names, addresses and phone numbers of any percipient witnesses to any aspect of the offense, investigation or analysis conducted in this case, whether favorable or unfavorable to the defense, regardless of the prosecution's intent to call these persons as witnesses in any hearing(s);
- Any and all statements made by any of the aforementioned witnesses, oral or written, recorded in any manner attested to, signed or not, by them;
- Any and all audio or visual recordings of the Defendant, the scene, or any other facts or circumstances related to the above offense however recorded and maintained;
- Any and all criminal records allegedly relating to this Defendant;
- Any and all criminal records of witnesses the prosecution intends to call at trial or hearing, whether felony or misdemeanor, and the probation status, if any, of these persons or any other relevant impeachment material of a witness;
- Any and all other favorable or exculpatory evidence, information and documents, in the possession of the District Attorney, any police department, or other agency or person available to the prosecution through due diligence;
- Any and all tapes, printouts, or other communication from any police, fire, or other dispatch regarding this offense;
- Any and all recordings, printouts or other memorialization of any communication concerning the investigation of this matter by any person involved in this matter;
- Any and all 911 or other calls to the police regarding this matter, however recorded or preserved;
- **Notice is hereby given that the defense requests any and all original recordings of any kind regarding this event to be preserved for inspection;**
- **Any and all information relevant to the creditability of any police officer involved in this matter.**

Dated this 7th day of December, 2022.

Respectfully submitted,

BAUMGARTNER LAW, LLC

/s/ S. Birk Baumgartner

S. Birk Baumgartner, #47829

/s/ Daniel C. Mossinghoff

Daniel C. Mossinghoff, #31923

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2022, a true and correct copy of the foregoing **ENTRY OF APPEARANCE AND REQUEST FOR DISCOVERY** was served upon all parties of record by filing the same through via Colorado Courts E-Filing System:

s/ Rachael Wallace
Rachael Wallace