

County Court, _____ County State of Colorado Address: _____ Phone: _____	
Plaintiff: <b>PEOPLE OF THE STATE OF COLORADO</b>  Defendant: _____	
Party without Attorney: Name: _____ Address: _____ Phone: _____ Email: _____	<b>▲ COURT USE ONLY ▲</b>  Case Number:  Div:
<b>REQUEST FOR DISCOVERY</b>	

The Defendant, \_\_\_\_\_, appearing here Pro Se and on their own behalf, respectfully requests the prosecutor provide for production, copying, examination and inspection by the undersigned counsel the following materials in possession or control of the prosecutor or his agents, or in the possession of his staff, or in the possession or control of any persons who participated in the investigation and evaluation of this case, and who either regularly reports or has reported to the prosecutor with reference to the within matter:

1. All written statements made by the Defendant, whether signed or unsigned.
2. All tape recordings, whether audio, video, or both, in which the Defendant appears or is heard, or any recordings of any statements made by the Defendant.
3. All written statements and all tape recordings, whether audio, video, or both, made of any statements made by witnesses, whether signed or unsigned, in connection with this case.
4. Any written memoranda, reports, notes, or recordings, whether audio, video, or both, of any investigating officer or agent who stopped the Defendant, spoke to the Defendant, or interviewed the Defendant, or any summary of any statements made by the Defendant to any officer or agent investigating the within matter. Such written documents requested would include any Proof of Service that pertains to the case.
5. Names and addresses of any and all persons who have knowledge pertaining to this case or have been interviewed by law enforcement officers in connection with this case, whether or not said persons will be called by the prosecutor as witnesses at trial.
6. A written list of the names and addresses of the witnesses presently known to the prosecutor whom he intends to call at trial.

7. Any and all written or recorded statements of witnesses and the substance of any oral statements made by the Defendant.
8. All police, arrest and crime or offense reports, including statements of all witnesses, whether or not the prosecutor intends to call as witnesses at the trial or at any pre-trial hearing.
9. Any and all books, papers, documents, photographs, video surveillance tapes or other tangible objects which the prosecutor intends to introduce in the trial or any pre-trial hearing or which were obtained from or belong to the Defendant.
10. The original notes or records made by any officers or investigators who participated in any phase of investigation of this matter.
11. Any and all material or information which tends to negate the guilt of the Defendant as to the offense charged or which would tend to reduce the punishment therefor.
12. Any record of prior criminal convictions of persons whom the prosecutor intends to call as witnesses at the trial or at any pre-trial hearing.
13. Any written or otherwise established policies of the prosecution with respect to plea bargaining, any unwritten local deadlines and any other unwritten local rules.

The Defendant further requests that, if subsequent to the compliance with this request, the prosecution discovers additional material or information encompassed by this request, or any exculpatory evidence, the prosecution will notify the Defendant's counsel of the existence of such material or information and furnish same to the Defendant. The prosecution may comply with this request by submitting copies of any material requested by the Defendant.

AS GROUNDS for this request, the Defendant alleges that such discovery requests are reasonable and necessary to the preparation of his defense and that such discovery is authorized by the provisions of Rule 16, Crim.P., and Rule 16, Colorado Rules of Criminal Procedure.

WHEREFORE, the Defendant requests that the prosecution produce the above-listed materials no later than ten (10) days upon receipt.

Respectfully submitted this \_\_\_\_\_th day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
(Signature)

Name: \_\_\_\_\_ [Print name]

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_