|  |  |
| --- | --- |
| District Court, Adams County, ColoradoCourt Address: 1100 Judicial Center Drive DABrighton, CO 80601 FIL | TE FILED: October 20, 2016 2:00 PM ING ID: BA684B9D31EE9ASE NUMBER: 2016CR1680 COURT USE ONLY  |
| THE PEOPLE OF THE STATE OF COLORADO, CPlaintiffv.MARIA MORADO,Defendant |
| Douglas K. Wilson, Colorado State Public Defender ARI KRICHIVER, No. 37780Deputy Public DefenderBrighton Regional Public Defenders4710 East Bromley Lane, Brighton CO 80601Phone: (303) 659-4274 Fax: (303) 659-6935E-mail: brighton.defenders@coloradodefenders.us | Case No. 16CR1680Division Q |
| **MS. MORADO’S NOTICE OF INTENT TO INTRODUCE EXPERT TESTIMONY REGARDING MENTAL CONDITION** |

Maria Morado, by and through defense counsel, gives notice that she intends to introduce, at trial, expert testimony regarding her mental condition pursuant to C.R.S. § 16-8- 107(3)(b). Ms. Morado further requests this Court order an evaluation pursuant to C.R.S. § 16-8-

106. As grounds, Ms. Morado states the following:

1. A defendant may present expert testimony concerning her mental condition if she gives notice to the court and the prosecution of her intent to do so. C.R.S. § 16-8-107(3)(b).
2. In order to present such evidence, the defendant must submit to a “court-ordered examination pursuant to section 16-8-106.” *Id*.
3. Ms. Morado intends to present expert testimony concerning her mental condition.
4. Ms. Morado further requests this Court order such evaluation to take place at the Colorado Mental Health Institute at Pueblo (CMHIP). Regarding the location of the evaluation, although “the court shall give priority to the place where the defendant is in custody[,]” CMHIP would be a more appropriate environment to conduct the evaluation.
5. Ms. Morado has received numerous threats while residing in the Adams County Detention Facility, and spent a significant amount of time in the medical unit on suicide watch. Ms. Morado suffers from anxiety and fear due to the environment in the jail.
6. CMHIP would be a much more neutral and stable environment in which to evaluate Ms. Morado.

WHEREFORE, Ms. Morado requests this Court recognize her notice of intent to introduce expert testimony regarding his mental condition, and to order an evaluation pursuant to C.R.S. § 16-8-107.

Respectfully Submitted, DOUGLAS K. WILSON

COLORADO STATE PUBLIC DEFENDER

/s/ Ari Krichiver

|  |  |
| --- | --- |
| ARI KRICHIVERDeputy State Public Defender 4710 East Bromley Lane Brighton, CO 80601(303) 659-4274 | **Certificate of Service**I hereby certify that on October 20 , 2016 , copies of the foregoing document were served on all opposing counsel of record./s/ Ari Krichiver  |

Dated: October 20, 2016