|  |  |
| --- | --- |
| District Court, Adams County, ColoradoCourt Address: 1100 Judicial Center Drive DATE FILBrighton, CO 80601 FILING I | ED: November 8, 2017 10:44 PM: CFF9770A9AE82 UMBER: 2017CR2565* COURT USE ONLY 
 |
| CASE NTHE PEOPLE OF THE STATE OF COLORADO,Plaintiff, v.EARL WILLIAMSDefendant. |
| Doug K. Wilson, Colorado State Public Defender Reid Rowe #43612Deputy Public DefenderBrighton Regional Public Defenders4710 East Bromley Lane, Brighton CO 80601Phone: (303) 659-4274 Fax: (303) 659-6935E-mail: brighton.defenders@state.co.us | Case No. 17CR2565Division Q |
| **NOTICE OF OBJECTION TO ANY EVIDENCE OF CRIMES, WRONGS, OR ACTS** |

D

Counsel for Mr. Williams gives notice of objection to any reference to similar transactions or uncharged misconduct by him on the following grounds:

1. Such evidence is presumptively irrelevant C.R.E. 404.
2. Any attempt to use such evidence will require a pre-trial hearing regarding the admissibility of such evidence pursuant to People v. Spoto, 795 P.2d 1314 (Colo. 1990) and People v. Garner, 806 P.2d 366 (Colo. 1991).
3. Such notice is required to allow defense counsel time to prepare to respond without affecting Mr. Manzanares’s right to effective assistance of counsel, due process of law, right to confrontation or witnesses and other rights under the laws and rules of both the United States and Colorado.
4. To avoid any delay in this case, such notice by the Prosecution should specify acts or incidents, the date of said acts, discovery as to those acts and include a list of witnesses the Prosecutor intends to present at any hearing to determine the admissibility of evidence that is the subject of this motion.

Respectfully submitted,

DOUGLAS K. WILSON

COLORADO STATE PUBLIC DEFENDER

Reid Rowe #43612

Deputy State Public Defender 4710 East Bromley Lane

**Certificate of Service**

I hereby certify that on 11/8/17 I served the foregoing document on all opposing

Brig ton, CO 80601

parties of record via ICCES

(303) 659-4274

Dated: November 8, 2017

 /S/\_Reid Rowe