

**STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT**

STATE OF NEW MEXICO,

Plaintiff,

vs.

HANNAH GUTIERREZ

**No. D-101-CR-202300040
Judge Mary Marlowe Sommer**

Defendant

CRIMES: Involuntary Manslaughter

FIRST AMENDED CRIMINAL INFORMATION

The District Attorney of Santa Fe County, State of New Mexico, states that on or about the dates listed below, in said County and State, the above named Defendant did commit the crimes of:

Count 1: Involuntary Manslaughter, (0007), on or about October 21, 2021 in Santa Fe County, New Mexico at the Bonanza Creek Ranch located at 545 Bonanza Creek Road, Santa Fe, New Mexico 87508 the above-named defendant did cause the death of Halyna Hutchins, committed in the commission of an unlawful act, to wit: Negligent Use of a Deadly Weapon, contrary to 30-7-4 (a)(3), and/or 30-7-4(a)(4), a fourth degree felony, contrary to NMSA 1978, Section 30-2-3(B)(1994).

IN THE ALTERNATIVE

Count 1: Involuntary Manslaughter, (007), on or about October 21, 2021, in Santa Fe County, New Mexico, at the Bonanza Creek Ranch located at 545 Bonanza Creek Road, Santa Fe, New Mexico 87508 the above-named Defendant did cause the death of Halyna Hutchins, committed in the commission of a lawful act, which might produce death in an unlawful manner or without due caution and circumspection, a fourth degree felony, contrary to NMSA 1978, Section 30-2-3(B) (1994).

The State requests that the first felony appearance shall remain as February 24, 2023 at 10:15 a.m. before the Honorable Mary Marlowe Sommer, Judge Presiding, and that the preliminary hearing be scheduled within sixty (60) days of the felony first appearance.

The names of the witnesses upon whose testimony is based is contained within the Third Amended Witness List filed with this Court on February 13, 2023.

Respectfully submitted,

/s/ Mary Carmack Altwies

Mary Carmack-Altwies

District Attorney

327 Sandoval St.

Santa Fe, NM 87501

505-827-5000

Defense Attorney: Jason Bowles

Name: Hannah Gutierrez

Address: c/o Jason Bowles, 4811 Hardware Drive NE, Suite D-5,
Albuquerque, New Mexico 87109

YOB: XX/XX/1997

POB:

Last 4 SSN: XXX-XX-0478

Height: 5'4"

Weight: 115 lbs.

Color of Eyes: Brown

Color of Hair: Blue

FBI No.:

Marks/Tattoos:

Aliases: Hannah Gutierrez-Reed; Hanna Gutierrez Reed

Booking Slip No:

State Tracking No.: Not Available

Magistrate Court No: