

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

STATE OF NEW MEXICO,

Plaintiff,

v.

D-101-CR-2023-00040

HANNAH GUTIERREZ-REED,

Defendant.

---

**RESPONSE TO EXPEDITED MOTION TO STRIKE DEFENDANT’S “SUPPLEMENT  
TO MOTION TO DISMISS SECOND AMENDED INFORMATION AND MOTION TO  
DISMISS THIRD AMENDED INFORMATION”**

---

Defendant Hannah Gutierrez-Reed, by and through her counsel of record, Jason Bowles of Bowles Law Firm, and Todd J. Bullion of Bullion Law Office, hereby responds to the Expedited Motion to Strike Defendant’s “Supplement to Motion to Dismiss Second Amended Information and Motion to Dismiss Third Amended Information” and responds as follows:

In this case, the various prosecutors have unleashed a repeated deluge of very prejudicial statements about Ms. Gutierrez Reed. Some of the statements were designed to influence potential jurors as to her guilt, and others were recklessly thrown out as unsupported rumors and innuendo. For example, the most recent special prosecutors made the completely unsupported statements that Ms. Gutierrez Reed was drinking and using drugs on nights on set and that she was likely “hung over” the day of the tragic shooting. To date, almost two months later, the state has still not identified a single witness to substantiate its reckless claims. This is also the same situation with the state’s newest charge, on alleged tampering by transferring an alleged unknown narcotic to another person. The state refuses to identify any witness in connection with this claim as well.

The State asks this Court to strike the supplemental filing by Ms. Gutierrez Reed, as untimely, but it could not have been filed before the state's most recent statements. The State wants free rein to recklessly taint the jury pool, but not allow Ms. Gutierrez Reed to respond in timely fashion to those statements with motion practice. The State also takes issue with the style of the supplemental motion, but in reality it could be styled a second motion to dismiss, and the content would be entirely the same. The problem in this case is that the due process violations never stop, and have never stopped. The idea that a fair trial is possible in this case is a complete farce at this point. The drinking, using, and now drug tampering allegations have now all made their way through the National Media multiple times and it's impossible to run a Google search on her name and not get pages and pages of stories on those unsupported allegations. Yet, every witness of which the defense is aware that has been interviewed to date has indicated Ms. Gutierrez Reed was never hung over or impaired on the Rust set.

In sum, the supplemental motion should not be stricken. It was filed in timely fashion in response to additional, unsupported and very prejudicial additional statements made by prosecutors. For all these reasons, the instant motion filed by the state should be denied.

Respectfully submitted,

/s/ Jason Bowles

Jason Bowles

Bowles Law Firm

4811 Hardware Drive, N.E., Bldg D, Suite 5

Albuquerque, N.M. 87109

Telephone: (505) 217-2680

Email: [jason@bowles-lawfirm.com](mailto:jason@bowles-lawfirm.com)

-and-

Todd J. Bullion  
4811 Hardware Drive, N.E., Bldg D, Suite 5  
Albuquerque, N.M. 87109  
Telephone: (505) 494-4656

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was sent through the ESF system, which caused the following parties to be served by electronic means, as reflected on the Notice of Electronic Filing this 10<sup>th</sup> day of July, 2023, to the counsel listed below:

Kari Morrissey  
Jason Lewis  
Special Prosecutors

/s/ Jason Bowles  
Jason Bowles  
Bowles Law Firm