

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

STATE OF NEW MEXICO,

Plaintiff,

vs.

HANNAH GUTIERREZ,

Defendant.

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

CRIMES: Involuntary Manslaughter

SECOND AMENDED CRIMINAL INFORMATION

Special Prosecutors Kari T. Morrissey and Jason J. Lewis on behalf of the State of New Mexico, state 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 product 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 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/ Kari T. Morrissey
Kari T. Morrissey
Jason J. Lewis
Special Prosecutors
1303 Rio Grande Blvd. NW, Ste. 5
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T: 505-361-2138

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: