

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.

DEFENDANT'S 5-502 DISCLOSURE

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, provide formal notice that the following items of evidence may be offered by the Defendant at trial:

1. Demonstrative evidence to be used by Defense Witness Frank Koucky including: dummy rounds, rubber firearms, one functional firearm, videos and items mentioned in Mr. Koucky's pre-trial interview. This demonstrative evidence is in the possession of Mr. Koucky.
2. Dummy rounds, leather gun belts, blanks, and the boxes that contained the dummy rounds and blanks. This evidence is in the possession of Thell Reed and Hannah Gutierrez-Reed.
3. Any evidence disclosed in discovery by the State.

Undersigned counsel acknowledges they have a continuing duty to disclose any additional information to which the defendant is entitled under N.M.R.Crim.P. 5-502.

Respectfully submitted,

/s/ Jason Bowles
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-and-

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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 12th day of February 2024, to the counsel listed below:

Kari Morrisey
Jason Lewis
Special Prosecutors
1st Judicial District Attorney's Office

/s/ Todd J. Bullion
Todd J. Bullion
Law Office of Todd J. Bullion