

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

STATE OF NEW MEXICO,

Plaintiff,

vs.

D-101-CR-2023-00040

HANNAH GUTIERREZ,

Defendant.

**DEFENDANT HANNAH GUTIERREZ REED'S SENTENCING
MEMORANDUM AND REQUEST FOR CONDITIONAL DISCHARGE**

Hannah Gutierrez Reed, by and through her counsel of record, Jason Bowles of Bowles Law Firm, and Monnica L. Barreras of the Law Office of Monnica L. Barreras, hereby submits her sentencing memorandum.

A jury convicted Ms. Gutierrez Reed of involuntary manslaughter and acquitted her of tampering with evidence. She faces up to 18 months incarceration. This Court has discretion to fashion a sentence which combines punishment with rehabilitation, supervision, and monitoring. At the time of the sentencing hearing, Ms. Gutierrez Reed will have spent just over a month in custody. In addition to the incarceration time, however, Ms. Gutierrez Reed has endured and will continue to endure collateral consequences far harsher than most defendants ever must face. This includes an almost unprecedented press response to a case in New Mexico, where hardly a month has gone by in the past two years without some kind of reporting regarding the case. The jury voir dire was a prime example when virtually every person in the jury room raised their hand about having heard something about this case. This conviction and press deluge will forever impact her life going forward, including with job prospects, and simply trying to lead a "normal" life again

someday. Because of the reporting, and having her personal data and information leaked to the press, she has also received numerous threats, including death threats. Predictably, all of this has caused her great anxiety, fear, and depression. She has sought and attended counseling to address these issues at Mohave Mental Health Clinic.

Days after this tragedy occurred, Ms. Gutierrez Reed wanted to express her deep sadness regarding this tragedy and the death of Halyna, to the Hutchins family. Legal proceedings and the looming investigation, however, made that impossible. Though she exercised her constitutional right to a jury trial, it did not mean that she didn't and doesn't still feel incredibly saddened and heart broken by what happened on that tragic day on the Rust set. The tragic series of events that unfolded that day destroyed and altered many people's lives, including Ms. Gutierrez's Reed's.

This Court has the incredible responsibility of weighing that a death did occur that day, with all the other relevant sentencing factors including Ms. Gutierrez Reed's history and personal characteristics, her work, her mental health history, substance use, and trauma that she has endured in her young life. Many of the attached letters detail these additional factors and provide the Court a more "holistic" picture of the kind of person Ms. Gutierrez Reed is. Following the jury verdict, counsel have received numerous unsolicited emails and calls from around the country and world, from people expressing their support for Ms. Gutierrez Reed. We have been informed that people have mailed letters on their own to this Court, and we ask that the Court consider all the sentiments expressed in these letters as well in computing a reasonable sentence that balances punishment, with rehabilitation, and the need for deterrence with the notion of fairness – including that Sarah Zachry received complete immunity and David Halls received 6 months of unsupervised probation on a misdemeanor. While Ms. Morrissey wasn't the one who reached the plea deal with Mr. Halls, it was still entered into by the State and prior prosecutors.

Ms. Gutierrez Reed has been gainfully employed for the past ten years. She was a social media marketing assistant for companies from 2022-2024. Within the movie industry before that, Ms. Gutierrez Reed was Armorer and props assistant in various films including Rust in October 2021, as an Armorer on The Old Way from August-September 2021, as Armorer on Murder at Yellowstone City in March 2021, a vacation rental cleaner from 2019 – 2020, and an Armorer on Once Upon a time in Hollywood in 2017. She was also on the set of Magnificent 7 in 2015, and at Rue 21 from 2014 – 2015. She also has helped her Dad, who was diagnosed with Leukemia, and has helped care for him when he needs help with various things.

Several of the letters provide examples of her character, personal traits and work ethic:

Sean Kridelbaugh Jr., is Ms. Gutierrez's boyfriend and has known her since she was little. Mr. Kridelbaugh, states "She's always helping people and going out of her way to make sure people are okay. She's apart of her community and always working and taking care of her dad."

Ms. Gutierrez's aunt, states that "she is kind and smart and the last person that should be in jail." She also states that Ms. Gutierrez helps her mom at work and that and her dad have a close relationship.

John Harper Felsch has been a friend of Ms. Gutierrez since 2016 and they have also lived together with other roommates. Mr. Felsch states in his letter to this Court that "Hannah would often be the first to welcome me into uncomfortable social situations and highlight my character to make me feel more welcome. She has fed me when I was hungry; when I had no money to purchase food for myself."

Rani Hutcherson, another friend of Ms. Gutierrez, states that "Throughout our friendship Hannah is a source of unwavering support and encouragement during some of my darkest moments. Whether I was grappling with relationship challenges or battling depression, Hannah is

always there to offer a listening ear, sage advice and comforting presence while living over 20 hours away now.”

Joey Merrigan, Ms. Gutierrez’s employer, states that “Hannah demonstrated remarkable dedication, professionalism, and talent. She consistently produced high-quality work and displayed a strong commitment to her responsibilities. Her creativity, attention to detail, and ability to effectively engage with our audience were invaluable assets to our team. Outside of her professional skills, I also had the opportunity to observe Hannah's personal qualities. She conducted herself with integrity, honesty, and reliability, earning the respect and trust of her colleagues and supervisors.”

Colleen Hart, who has known Ms. Gutierrez for eight years, states that Ms. Gutierrez “has volunteered to help clean, sand and repaint her neighbor’s deck. She volunteered and helped raise money for a local Veterans Council that is not for profit. In my experience she is a thoughtful and kind human.”

Kelsi Hill, another friend of Ms. Gutierrez, states that “Hannah is a person of utmost integrity and moral character. She has always strived to uphold the principles of honesty, compassion, and responsibility in all aspects of her life.”

The letters in totality paint a picture of Hannah being kind, helpful, hard working and a wonderful friend and daughter. Hopefully these letters provide the Court with a fuller picture of her overall character from people who know her well.

SENTENCING LAW AND REQUEST

New Mexico case law states that among the factors that may be considered when deciding a sentence are: (1) unusual aspects of the defendant's character, (2) past conduct, age, health, any events surrounding the crime, (3) pattern of conduct indicating whether he or she is a serious threat to society, and (4) the possibility of rehabilitation; however, a trial court is not limited to these factors. *State v. Segotta*, 100 N.M. 498, 501, 672 P.2d 1129, 1132 (1983); *State v. Bernal*, 106 N.M. 117, 739 P.2d 986 (Ct. App. 1987). The specifics of the crime and the characteristics of the defendant are relevant to the sentencing court's exercise of its discretion to sentence the defendant. *State v. Wilson*, 2001-NMCA-032, 130 N.M. 319, 24 P.3d 351, cert. quashed, 132 N.M. 484, 51 P.3d 527 (2001). The sentencing judge must make a “careful, independent evaluation of defendant's rehabilitative potential.” *State v. James*, 109 N.M. 278, 283, 784 P.2d 1021, 1026 (Ct.App.1989), citing *United States v. Grayson*, 438 U.S. 41, 98 S.Ct. 2610, 57 L.Ed.2d 582 (1978); see also *State v. Segotta*, 100 N.M. 498, 501, 672 P.2d 1129, 1132 (1983) (suggesting legislature “required the court to consider, when determining the sentence within the presumptive range, not only the nature and elements of the offense and the character **494 *4 and record of the offender, but also aggravating and mitigating circumstances surrounding the offense and the offender”).

Although the basic sentence is up to 18 months imprisonment, the Court has discretion to grant a conditional discharge, and to provide Ms. Gutierrez Reed an incentive to rehabilitate and comply with all requirements the Court may impose on probation. A sentence of conditional discharge may be imposed under Section 31-20-13 NMSA, which provides, that

A. When a person who has not been previously convicted of a felony offense is found guilty of a crime for which a deferred or suspended sentence is authorized, the court may, without entering an adjudication of guilt, enter a conditional discharge order and place the person on probation on terms and conditions authorized by NMSA 1978, Section 31-20-5 (2003) and NMSA 1978, Section 31-

20-6 (2004). *A conditional discharge order may only be made available once with respect to any person.*

B. If the person violates any of the conditions of probation, the court may enter an adjudication of guilt and proceed as otherwise provided by law

The legislature enacted the conditional discharge statute as an alternative to a suspended or deferred sentence. *In re Treinen*, 139 N.M. 318 (N.M. 2006); *State v. C. L.*, 2010 NMCA 50 (N.M. Ct. App. 2010). A conditional discharge order may only be made available once with respect to any person. It may be given for an array of first-time felony offenses, even those who are found guilty of a violent offense. *See, In re Treinen*, 139 N.M. 318 (N.M. 2006)(Conditional discharge given for battery against a household member and two felony counts for intimidation of a witness and false imprisonment); *State v. Lefebvre*, 2010 WL 4924727, (N.M. Ct. App. Aug. 25, 2010) (order of conditional discharge entered after a jury found him guilty of possession of methamphetamine); *State v. C. L.*, 2010 NMCA 50 (N.M. Ct. App. 2010)(conditional discharge given for crime of negligent child abuse resulting in great bodily harm); *State v. Herbstman*, 126 N.M. 683 (N.M. Ct. App. 1998)(plea of guilty to criminal sexual penetration, given conditional discharge); *State v. Fairbanks*, 134 N.M. 783, 785 (N.M. Ct. App. 2003)(conditional discharge given for crimes of distribution of an imitation controlled substance and possession of a controlled substance).

Ms. Gutierrez Reed is eligible for a conditional discharge. She has a complete lack of prior criminal history. It is proper to consider her employment record, record of prior good works and positive things she has done when considering this sentencing option. The facts support a conditional discharge, based on her lack of a criminal history, her personal character traits as expressed in the outpouring of letters from the community, and her relative youth and the devastating effect a felony will have on her life going forward. A conditional discharge will

require Ms. Gutierrez Reed to abide by all set conditions during any term of a probationary period and to undergo all counseling and rehabilitative efforts this Court requires.

Considering all the circumstances, and the sentencing factors including the history and characteristics of Ms. Gutierrez Reed (as further set forth in the series of letters presented to this Court), the proposed conditional discharge is warranted. A sentence with some period of incarceration followed by a term of probation is adequate to punish the offense, but not more serious than necessary to serve the underlying sentencing goals. The punishment also furthers the basic purposes of criminal punishment: deterrence, incapacitation, just punishment, and rehabilitation.

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

-and-

/s/ Monnica L. Barreras

MONNICA L. BARRERAS

LAW OFFICE OF MONICA L. BARRERAS

P.O. Box 27158

Albuquerque, NM 87125

Telephone: (505) 242-3919

monnica@barreraslaw.com

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 10th day of April, 2024, to the counsel listed below:

Kari Morrisey, Special Prosecutor
Jason Lewis, Special Prosecutor

/s/ Jason Bowles
Jason Bowles
Bowles Law Firm

From: [Sean Kridelbaugh](#)
To: [Carmella Sisneros](#)
Subject: Hannahs character letter
Date: Sunday, March 31, 2024 8:37:52 AM

Hello there my name is Sean Kridelbaugh Jr. and I am Hannah Gutierrez boyfriend. I've known Hannah since we were kids and she's always been a great caring person. Loved by everyone that truly knows her. She's always helping people and going out of her way to make sure people are okay. She's apart of her community and always working and taking care of her dad. She's helped me this past couple years to open up and not just push everyone away. She's an amazing person that the media is painting a bad picture about. To say she isn't remorseful would be an understatement. These past few years have been the hardest for her mentally with not only Ms. Hutchins death but with all the harassment and threats she gets from the case being highly public and the release of her personal information. (Don't know how that's legal) She understands that Ms. Hutchins family will never get her back and she cries constantly for them. I know for sure that she's remorseful everyday all day and night. Dreaming about it and all. All the trauma I'm sure. Her being incarcerated will impact her taking care of her father at home with cancer. Not asking you to let her off just asking for a more lenient sentence of house arrest, probation, fines, and community service or something. Thank you for taking the time to read my letter. Bless you. - Sean Kridelbaugh Jr.

2/10/2024

Regarding Hannah Gutierrez Reed

To who the name is

I'm Hannah's aunt by marriage and I've known her since she was 6 years old. First I have to say Hannah is the same person no matter what her hair color.

Hannah has always been a good girl/lady. She is family oriented and her parents couldn't ask for a better daughter. She helps her mom at work when possible. She is a good sister to her brother Tyler. She and her dad have always been close.

Hannah has always been polite and respectful to me. She hugs me when I see her. She is kind and smart and the best person that should ever be in jail. I thank you for your time reading this letter.

Sincerely,

Michelle Gutierrez

John Harper Felsch

1105 E Ponderosa Pkwy #221
Flagstaff, AZ
(480) 232-6787
jhfelsch@gmail.com

March 29th, 2024

To Whom It May Concern:

My name is John Harper Felsch. I am a resident of Flagstaff, Arizona. I attended Northern Arizona University and graduated with a Bachelor's Degree in Computer Engineering. I have been a friend of Hannah Gutierrez since around 2016 when we met through mutual friends. I went on to live with Hannah and several other roommates for about two years, starting in 2017 through 2020.

I am writing this letter on behalf of Hannah. While I respect the judicial ruling in the case, I would like to shed light on the kind of person that Hannah has been to me as a friend. Hannah would often be the first to welcome me into uncomfortable social situations and highlight my character to make me feel more welcome. She has fed me when I was hungry; when I had no money to purchase food for myself. She has been a shoulder to cry on in my darker moments. She had helped me find a sense of belonging and pride that I desperately needed at that time in my life. Her sense of humor helped alleviate the pain of the events unfolding around me. Living with her was a joy that I am grateful to have experienced. I have always valued Hannah as a friend, and the circumstances of this situation are deeply saddening and confounding.

I would like to thank the court for their willingness to hear my plea. I would like to ask that the court only attribute the minimal sentencing to her case. Hannah does not have malicious intention; and while I recognise that the events of October 21 resulted in the death Halyna Hutchins (with my sincerest condolence), I would like to ask the court to consider Hannah's humanity, and that she did not mean to hurt anybody, and while there is a price to pay, she is a good person in my eyes and heart.

Sincerely,

John Harper Felsch



Rani Hutcherson
4900 Stratford Place Drive
Sanger, Tx

To whom it may concern:

My name is Rani Hutcherson. I am currently the General Manager of Lone Star Lodge and Marina. However I met Hannah Gutierrez-Reed through a work colleague during my transition out of college and into a Management position at Beavers Bend Marina. We have been close friends for five years. When first meeting Hannah Gutierrez-Reed she was still in college studying film. Her passion for the industry radiated when she spoke about her future career, and the opportunities she saw.

Throughout our friendship Hannah is a source of unwavering support and encouragement during some of my darkest moments. Whether I was grappling with relationship challenges or battling depression, Hannah is always there to offer a listening ear, sage advice and comforting presence while living over 20 hours away now. Her ability to connect with people on a personal level when they first meet is a testament to who she is as a person. We have not lived together in over four years but never once have I slipped through the cracks of friendship like most do with distance and time.

Unfortunately, Hannah has found herself under intense scrutiny by the media, which has painted an inaccurate and unfair portrayal of her character. As someone who has witnessed her actions and interactions firsthand, I can confidently say that the image presented by the media does not align with the Hannah I know. While I wasn't with her everyday during the last few years, I was there to support her during this trying time. Rather than allowing herself to be consumed by negativity, she has focused on staying true to herself and maintaining her integrity.

It is my understanding that Hannah has cooperated fully with authorities investigating the incident and has expressed profound remorse for the loss of life that occurred. I believe that she is genuinely remorseful and that this tragedy has left an indelible mark on Hannah Gutierrez-Reed.

In light of these considerations, I respectfully urge the court to take into account Hannah's character, her lack of prior offenses, and her cooperation with the investigation when sentencing the case. While the consequences of the incident are irreversible, I hope the court will recognize that Hannah is a young woman who made a mistake in the course of performing her duties, rather than someone who acted with malicious intent.

Rani Hutcherson

Your Honor, I am writing to provide a character reference for Hannah, who I have had the privilege of knowing in a professional capacity as her employer. While I regret the circumstances that have led to her current situation, I feel compelled to share my perspective on her character based on my interactions with her. As the social media manager for Mike and my furniture store, Mattressland & Furniture, Hannah demonstrated remarkable dedication, professionalism, and talent. She consistently produced high-quality work and displayed a strong commitment to her responsibilities. Her creativity, attention to detail, and ability to effectively engage with our audience were invaluable assets to our team. Outside of her professional skills, I also had the opportunity to observe Hannah's personal qualities. She conducted herself with integrity, honesty, and reliability, earning the respect and trust of her colleagues and supervisors. Despite the challenges she may be facing, I believe that Hannah possesses the resilience and determination to overcome them. While I cannot speak to the specifics of Hannah's current situation, I can attest to her positive character traits and her potential for rehabilitation and contribution to society. I sincerely hope that Your Honor will take into consideration the person beyond the circumstances and offer any appropriate leniency or support that may be warranted. Should you require any further information or clarification, please do not hesitate to contact me. Respectfully,
Joey Merrigan
928-444-7489

Colleen Hart
3818 N. Eagle Rock Rd
Kingman, Az 86409

Honorable Judge Sommer

My name is Colleen Hart. My occupation is HR Manager for a cabinet company in Kingman, Az. I have known Hannah Gutierrez Reed for eight years. I met her through her childhood best friend. I consider Hannah to be extended family and a loyal friend. I have known Hannah to be hard-working, creative, and artistic. She put herself through college and never gave up on her dreams.

When she traveled home from Flagstaff, Az., she would always call to see if I were available for coffee or just to say hello. Some kids in their mid-twenties would not take the time to check in with an older friend. In December of 2022 Hannah was coming through town and wanted to have coffee. She found out my husband and I both had Covid-19. She checked on me and my husband regularly while we were extremely ill for two weeks. She has volunteered to help clean, sand and repaint her neighbor's deck. She volunteered and helped raise money for a local Veterans Council that is not for profit. In my experience she is a thoughtful and kind human.

Hannah is remorseful and understands the gravity of that fateful day in New Mexico. Her spunky attitude and excitement for the future has been dimmed. She is working on improving her life and that of those that are around her.

When determining her sentence please consider this plea for the court to consider a rehabilitative approach rather than solely punitive measures? My hope is that Hannah will receive the tools to move forward through counseling & therapy if she is to remain incarcerated. I believe in the power of redemption and my hope is you take these points into account during sentencing.

Sincerely,

Colleen Hart
HR Manager
American Woodmark Corporation
Cell 928-530-1517

Your Honor,

I am writing to provide a character statement for Hannah Gutierrez-Reed, whom I have known for over 6 years and have considered a good friend the last 4 while I resided in Bullhead City, AZ where my family and I spent a significant amount of time with her.

Hannah has been wrongfully convicted of involuntary manslaughter. Throughout this ordeal, I have witnessed firsthand the impact of media sensationalism and public scrutiny on her life.

Hannah is a person of utmost integrity and moral character. She has always strived to uphold the principles of honesty, compassion, and responsibility in all aspects of her life. Despite the wrongful accusations and intense media scrutiny, she has remained steadfast in maintaining her integrity and dignity.

It is evident that the media's portrayal of this case has been sensationalized and biased, leading to a rush to judgment and the wrongful conviction of an innocent individual. The relentless media attention and public pressure have created an unjust environment that has further compounded the tragedy of this situation.

Throughout this ordeal, Hannah has shown remarkable resilience and courage. Despite facing unjust accusations and the loss of her freedom and privacy, she has maintained a positive outlook and a strong belief in the truth. Her unwavering determination to seek justice and clear her name is a testament to her character.

I urge the court to consider the mitigating factors in this case, including the undue influence of media sensationalism, and to grant the minimum sentence possible under the circumstances. Hannah has already suffered immeasurable harm as a result of this wrongful conviction, and it is imperative that she be given the opportunity to reclaim her life and reputation.

Thank you for considering my statement.

Sincerely,

Kelsi Hill
928-605-6762

519376 HWY 95

Bonner's Ferry, ID 83805
March 30, 2024

Carolyn S. Adams, R.N., President of the Colorado River Republican Women & Executive Board
Committee, Board Director of The Colorado River Historical Society and Museum, Precinct
Committeeman of The Mohave County Republican Central Committee. Secretary-Treasurer of Pueblo
Construction, Inc.

1465 Arena Circle, Bullhead City, Arizona 86442, email: csa3491@frontiernet.net, phone: 928-715-3557

To Whom It Might Concern,

I'm writing this because of the concern that I have for a dear friend of mine that has been determined to be guilty of a serious crime. I have known Hannah for several years and am very worried about her. She's very young and I'm sure found it very difficult to give orders to a much older actor that has years of experience and very set in his ways. I partied with her multiple times and have never known her to be out of control, or never was aware of any behavior unbecoming to her.

I have a lot of respect for Hannah. Since the incident when she came back home to Bullhead City, she had a place of her own, had a job, and didn't hang her head and expect pity. Now of course, she's back home being a caregiver to her ill father. Still working from home with another job. She's a very motivated young lady and a hard worker. She hasn't depended on her family and is a very determined gal to be independent.

I'm hoping and praying the courts will take into all considerations of this case.

Carolyn S. Adams

Beverly Cotten

2059 Whitewater Dr

Bullhead City Az 86442

928-234-8584

beverlycotten@yahoo.com

To Whom it May Concern:

My name is Beverly Cotten ,and I am Hannah Gutierrez-Reed's extra mom. I have known her since before she started high school. Not too long after she came into my life (she is friends with my daughter) I quickly became her extra mom. I loved who she was and how she handled herself ; she stood up for what she believed in, didn't care what other people thought about her, and didn't give into peer pressure when other people told her how she should be. Then, I got to know her on a deeper level where I got to know her heart, and fell in love with her as a person. She comes to all of our family gatherings and has been doing so for over 10 years. Hannah has such a big heart she makes time for all her "families" (which includes all of her friend's families too) in Bullhead on the holidays to spend time with them, she has multiple that she goes to. Hannah always brings something, normally it is her specialty--deviled eggs, and they are so good everyone looks foreword to them. She spends quality time with everyone and always helps clean up afterwords. Her soul is beautiful. She has done Christmas morning with us for many years. My daughter and her are now sisters and I believe soul mates.

I respect the justice system and the jury verdict. I wanted to write to you to let you know the personal side of Hannah and how this has affected her life. I talked to Hannah on the day of the incident, and she was so upset that something like this had happened, and she was in complete disbelief. When she found out Halyna Hutchins died, a part of Hannah left with her. Hannah greatly admired Halyna as a person and for the job she did, because she was not only an amazing cinematographer (and that is what Hannah aspired to be), but she was also an amazing person in Hannah's opinion. She is very remorseful of everything that happened and the part she played in this tragedy. We have had many conversations about it. Hannah went to 4 years of college at North Arizona University to work in the movie industry. This tragedy has completely changed her life in so many ways and she no longer wants to work for the movie industry; whether she could or not after this, she had decided she wasn't going back. She is now trying to figure out what to do with her life since that's all she wanted to do for a career. She wanted to do so much more than just be an Armorer.

I am asking for time served and probation. Thank you for your time. I am available to confirm the facts in this letter as necessary.

Beverly Cotten March 27, 2024

Beverly Cotten

March 23, 2024

To: The Honorable Mary Marlowe Sommer
c/o The Bowles Law Firm

Reference: Hannah Gutierrez-Reed

Your Honor:

My name is Donna Kay Cotten, and I am 60 years old. I am writing this letter to tell you about the person Hannah Gutierrez-Reed is, and how this tragedy has changed her.

I have known Hannah Gutierrez-Reed for over ten (10) years. When I first met her, she was a Junior in High School. Since that time, I have watched her grow up, and am proud of the person she has become. She has always been the person that would give the shirt off her back if there was someone that needed it more than she did, and I have watched her go above and beyond to help friends and strangers alike. She is a part of a core group of friends of my daughters and is a part of our family.

She attended North Arizona University for four (4) years and majored in film and television. Her plan was to become a Cinematographer and Producer. When she was hired onto "Rust", she was so excited to be working with Halyna Hutchins because she admired her work. I have spoken to Hannah many times since that tragic day in October of 2021. The events of that day have changed Hannah to her core. She made a decision immediately to never return to the film industry, not only as an Armorer, but in all aspects of the film industry. This was an extremely difficult decision for her, because her education and work experience is all in the film industry. In 2022, Hannah has been working very hard to create a business in marketing by doing social media advertising here locally in Bullhead City, Arizona. I am proud of the difficult decision she made to leave the film industry, and of the effort she is putting into creating and building her business. She is extremely remorseful for what happened to Halyna and Joel, and her part in the tragedy. She has told me, many times, "I wish I checked them better".

During the trial, the Prosecution said that Hannah only cared about her career ending. Please know that Hannah cared deeply about the status of Halyna Hutchins and Joel Souza and asked continuously about their status. When she found out that Halyna passed away, she was crushed. Just two (2) years prior, Hannah's boyfriend died in a motorcycle accident, and all she could think about was Halyna's husband and son and the pain they would suffer as a result of her loss.

Hannah was offered a plea deal by the District Attorney prior to the trial. She and I discussed whether she should take the plea or go through the jury trial. She tried to have her attorney amend the plea by removing the item stating that Hannah brought the live rounds on set. Since she did not bring them on set, and did not know how they got there, Hannah did not feel right in taking the plea deal and lying to the court. In our discussions, I told her that I don't believe I would have made the same decision – I would have taken the easy way out and taken the plea. Her response was I just can't lie to the court, and I will put my fate in the hands of the jury.

I know Hannah is not a danger to society, nor will she ever work with guns again. With these thoughts in mind, I am requesting time served and probation in this case. If you have any questions about the contents of this letter, or need clarification of anything, please do not hesitate to contact me at the number below. Thank you for your time.

Sincerely,



Donna Kay Cotten

2059 Whitewater Dr.

Bullhead City, AZ 86442

(928)234-8584

Jeri Cotten
2059 Whitewater Dr.
Bullhead City, Arizona 86442
jerireaganw@gmail.com

To whom it may concern;

Hello, my name is Jeri Cotten, and I am co-owner of TriState Handyman LLC, and also Hannah Gutierrez closest friend. We played softball together as young kids, and became best friends around the summer of 2015. Hannah has shown me what a true friend really is, and proven the definition of "loyalty" to me and others countless times, it's almost impossible to put 9 years of unconditional support into words.

Since I met hannah she has always been the person who takes the high road, and never let others influence her own decisions. Even with all the hardships life has thrown at her, her fiancé dying in a motorcycle wreck, losing her place to live, her dog passing away, her step father developing leukemia, the *RUST* incident, and much more she has never let it destroy the outgoing and loving person she truly is. No matter what she is going through, she makes it important to also always be the supportive friends to those in need.

When my father died in March of 2022, in the middle of Hannah dealing with her own personal struggles, she did not let me go through it alone. She stayed right by my side countless nights while I cried and screamed at the world, she made sure I never felt alone, and was never physically alone either. This wasn't the first time she showed loyalty and real friendship either, in September of 2016 my grandfather (who I lived with) was in a motorcycle accident that left him in a coma for months, Hannah did not hesitate to come stay with me anytime my household was empty, and she made the trip back and forth to Vegas with me to visit him in the hospital more times than I can count.

Hannah has always been a big support system to a lot of people in our small town, helping house and dog sit for friends when needed, and also helping out making sure my niece had a ride to and from school if her father had to work. She has supported all local bands, and went to every show she was able to, as well as doing many community service events with her current place of employment, Mattress Land.

As I respect the justice system and understand the jury's verdict, I am writing to give you some insight as to who this woman really is, she comes from a small town, where success is rare, but she never let that stop her from striving. I have been by Hannah's side since the day of the *RUST* shooting, I spoke to her on the day it happened and she was completely distraught and immediately wished she could've changed what happened that day. October 21, 2021 completely changed her life and she feels remorse every single day. I hope you take into consideration everything I have said when determining her sentencing, along with time served, and possibly probation if .

Thank you for taking the time to read this letter, I am available to confirm any facts in this letter.

Sincerely,

Jeri Cotten



1001 J Street, Suite 1000
Sacramento, CA 95811

The Honorable Mary E. Marlin Swadlow
First Judicial District Court
225 Northgate Blvd.
P.O. Box 2268
Santa Fe, NM 87504-2268

Your Honor,

WITH CLOSE TIES TO THE LAND OF ENCHANTMENT AND AS A PROXY FATHER OF A UNMARRIED, TO AGREE
ANYTHING, MY WIFE MS. ROCHELLE LEDIGAMA, ABROUGED IS NOT OBLIGATED TO VOICE MY OPINION WITH THE
SENTENCING OF MS. HANNAH GUTIERREZ REED. AS I DO NOT KNOW MS. GUTIERREZ REED, I AM UNABLE TO BE A
VOICE OF REASONING IN THE SENTENCING PHASE OF HER TRIAL. I DO NOT CONDONE SUCH AN EXTENSIVE AND
EXTREMELY PRISON TERM AS DEEMED NECESSARY BY THE COURT FOR THE SIMPLE FACT THAT THE CONVICTED IS NOT A
THREAT TO SOCIETY NOR AN IMMEDIATE DANGER TO THOSE AROUND HER. I URGE YOUR HONOR TO SEE MS.
GUTIERREZ REED AS AN INDIVIDUAL, THIS NOT SUSCEPTIBLE TO THE SUM THAT ACTUALLY RESIDES IN INTERMED.

Sincerely,

MIKE B.
HEAD COACH SACRAMENTO KINGS

3/12/2024

To the court system:

Hannah is good and pure. I can't believe she is in jail. Her composure and strength, during this, I'll never forget. You got the wrong person in custody. That's all I have to say.

Raymond Graffio

A handwritten signature in cursive script, appearing to read 'Ray Graffio', written in dark ink on a light background.