

<p>County Court, (xxx) County, Colorado  Court Address( xxxx)  (city) , CO (zipcode)</p> <hr/> <p>PEOPLE OF THE STATE OF COLORADO,  Plaintiff,</p> <p>vs.</p> <p>JOE BIKER,  Defendant.</p> <hr/> <p>Attorney or Party Without Attorney: (Name &amp; Address)</p>	<p style="text-align: center;">▲                      ▲</p> <p style="text-align: center;"><b>COURT USE ONLY</b></p> <hr/> <p>Case Number:</p> <p>Div.: Ctrm:</p>
<p><b>Motion for Discovery of Training Materials</b></p>	

COMES NOW the Defendant, and requests that this Honorable Court enter its Order requiring the prosecution herein to produce, for inspection and copying, the following specified documents, and:

AS GROUNDS THEREFORE, states as follows:

1. The Defendant was stopped and charged with a violation of section 42-5-422, C.R.S. Defendant contends that he was stopped without probable cause or a ‘reasonable, articulable suspicion’ of criminal conduct.
  
2. On information and belief, Defendant contends that the (Golden?) police Department may have “training materials” which advise police officers about stopping motorcycles for allegedly loud exhaust pipes. Such information may be relevant to the credibility of the officer.
  
3. Such materials may also important to determine if the officer has sufficient expertise to testify as an expert under Rule 702, C.R.E.

WHEREFORE, Defendant prays this Honorable Court issue its Order that the prosecution herein produce, for inspection and copying by the defendant, all documents which evidence any training given to the police agency which employed the police officer(s) who stopped the defendant or who issued him the citation herein, and that the Court grant such other and further relief as may be just and proper.

Respectfully submitted,

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(Joe Biker)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing document was placed in the United States mails, postage prepaid, this (date) , addressed to (name and address of prosecutor)

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