

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO Lindsey-Flannigan Building 520 W. Colfax Ave. Denver, Colorado 80204	COURT USE ONLY
PEOPLE OF THE STATE OF COLORADO V LAURENCE GOODMAN, Defendant	
BETH MCCANN, District Attorney Robert S. Shapiro, #26869 Special Deputy District Attorney 1300 Broadway, 9 th Floor Denver, CO 80203 720-508-6000 robert.shapiro@coag.gov	Case No: 17CR10088 Courtroom: 5D
PEOPLE'S CONSOLIDATED RESPONSE TO DEFENDANT'S VARIOUS DEMANDS AND MOTIONS FILED BETWEEN AUGUST 27, 2018 AND SEPTEMBER 5, 2018	

Denver District Attorney, Beth McCann, by and through her Special Deputy District Attorney, Robert S. Shapiro, hereby responds to the Defendant's various Demands and one Motion, as follows:

1. On August 27, 2018, the Defendant filed a "Motion for State Paid Transcripts" by using a form known as the JDF 673. This particular form is used when a Defendant is filing a Felony Appeal. Based on the Defendant, being out of custody and not yet making a showing as to his indigent status, it premature for the Court to grant this Motion. Furthermore, the Defendant's case is still in the pre-trial phase so a legally viable felony appeal is not yet ripe. It should also be noted that the Defendant has hired and fired two separate private defense attorneys during the pendency of this matter, thus further indicating a reasonable likelihood that he would not qualify as being indigent. Therefore, the Defendant's Motion should be denied.

2. On September 5, 2018, the Defendant filed a "Demand for Order of Immediate Removal of Ankle Monitor." The apparent central basis for the Defendant's demand stems around his assertion that the State of Colorado does not have jurisdiction over him. Furthermore, the Defendant next alleges that his health and liberty are being negatively impacted by this reasonable bond condition that was imposed when his bail bond amount was significantly reduced in May 2017. The People assert that the use of the GPS ankle monitor has been, and continues to be, an effective means to best assure that the Defendant appears for court, including for the recently reset Jury Trial that now begins in

January 2019. As a result, the Defendant's Demand should be denied as well.

3. On September 5, 2018, the Defendant filed another "Demand for Order Returning Private Property." This successive filing, which substantially mirrors a prior filing, is not being read by the People as constituting a Motion to Suppress Evidence, but rather is another attempt by the Defendant to require the People to return to the Defendant his property that was seized pursuant to a lawfully executed Search Warrant that occurred on April 5, 2017. As of August 27, 2018, a full four and half months prior to the next trial setting, the People have exercised due diligence and acted in good faith to ensure that the discovery in this matter has been provided to the Defendant. This includes providing the Defendant with a complete mirror image of the hard drives and external storage drives from the Defendant's digital and computer related devices. Therefore, based on the People's ongoing efforts and because the Defendant has failed to articulate a viable legal rationale to grant his Motion, the People request that this Court also deny the Defendant's Demand.
4. On September 5, 2018, the Defendant also filed a "Demand and Motion for Summary Judgment, Default, Judgment as a Matter of Law, and Directed Verdict Pursuant to Fraud on the Court." This successive filing follows similar pleadings that have been previously litigated and which resulted in the Court denying the Defendant's sought after remedies. In this latest pleading the Defendant has failed to submit any new information, either viable legal support or facts, which merit the Defendant's sought after relief. Therefore, the People again request that the Court deny the Defendant's Demand.

Respectfully submitted this 11th day of September 2018,

BETH MCCANN
District Attorney

/s/ Robert S. Shapiro
Robert S. Shapiro #26869

CERTIFICATE OF SERVICE

I certify that on this 11th day of September 2018, a true and correct copy of the foregoing response pleading was served via the Colorado Courts E-Filing system (ICCES) as well as the People mailing a copy of the foregoing response pleading to the unrepresented defendant listed below:

Laurence Goodman
PO Box 3792
Boulder, CO 80307-3792

By: /s/ paralegal for R. Shapiro