

<p>SUPREME COURT, STATE OF COLORADO</p> <p>ORIGINAL PROCEEDING IN DISCIPLINE BEFORE THE PRESIDING DISCIPLINARY JUDGE 1300 Broadway, Suite 250 Denver, Colorado 80203</p> <hr/> <p>Complainant: THE PEOPLE OF THE STATE OF COLORADO</p> <p>Respondent: MARK HURLBERT, #24606</p> <hr/> <p>Erin Robson Kristofco, #33100 Senior Assistant Regulation Counsel Jonathan Blasewitz, #48277 Assistant Regulation Counsel Jessica E. Yates, #38003 Attorney Regulation Counsel Attorneys for Complainant 1300 Broadway, Suite 500 Denver, Colorado 80203 Telephone: (303) 928-7911 Email: e.kristofco@csc.state.co.us; j.blazewitz@csc.state.co.us</p>	<p style="text-align: center;">FILED</p> <p style="text-align: center;">February 15, 2024</p> <p style="text-align: center;">Presiding Disciplinary Judge Colorado Supreme Court</p> <p style="text-align: center;">▲ COURT USE ONLY ▲</p> <hr/> <p style="text-align: center;">Case Number: 24PDJ012</p>
<p>COMPLAINT</p>	

THIS COMPLAINT is filed pursuant to the authority of C.R.C.P. 242.15, 242.16 and 242.25, and it is alleged as follows:

Jurisdiction

1. The Respondent has taken and subscribed the oath of admission, was admitted to the bar of this Court on October 14, 1994, and is registered upon the official records of this Court, registration no. 24606.

2. Respondent is subject to the jurisdiction of this Court in these disciplinary proceedings. The Respondent's registered business address is 136 Justice Center Road, Suite 203, Canon City, Colorado 81212.

General Allegations

3. Respondent is a Deputy District Attorney for the 11th Judicial District Attorney's Office, which includes Fremont, Chaffee, Park and Custer Counties.

4. Respondent worked as a Deputy District Attorney ("DDA") in 2019 and 2020 for the 11th Judicial District before being rehired on a contractual basis to handle prison cases.

5. After Suzanne Morpew went missing in May 2020, the Chaffee County Sheriff's Office and other law enforcement executed hundreds of search warrants, and a massive amount of electronic data was collected.

6. The Morpew case was highly publicized and hundreds of community members participated in their own searches for Suzanne Morpew.

7. In January 2021, Linda Stanley was elected as the District Attorney ("DA").

8. On May 5, 2021, Commander Alex Walker, Chief Investigator of the District Attorney's Office, submitted an Affidavit in Support of Arrest to the court, seeking a warrant with a no bond hold of Morpew for first degree murder of his wife, Suzanne Morpew.

9. Judge Patrick Murphy found that there was probable cause to arrest Morpew and signed the arrest warrant the same day.

10. On May 18, 2021, DA Stanley and Chief DDA Lindsey filed a "Complaint and Information" which lists the official charges against Barry Morpew as: one count of first degree murder, one count of tampering with a deceased human body, one count of tampering with physical evidence, possession of a dangerous weapon, and one count of attempt to influence a public servant.

11. Respondent initially was not involved in the Barry Morpew prosecution because DA Linda Stanley directed him to prosecute a prison homicide and a cold case.

12. Within the first few months after Morpew's arrest, DA Stanley was made aware that her office was having extreme difficulty complying with Colorado Rules of Criminal Procedure Rule 16 mandatory disclosures in a timely manner in the Morpew case.

13. Before Respondent joined the prosecution team, Morpew's defense team filed a motion to compel and for sanctions because the prosecution failed to timely disclose all information to Morpew as required by Rule 16.

14. On June 3, 2021, Judge Murphy issued an Order in response to defendant's discovery motions declaring,

The defense request for all "emails and text messages between law enforcement officers and all individuals (including prosecutors) contacted and pertaining to this case" is too broad and is not required by case law or statute. ... Therefore it is ordered that any electronic communications

created or received by law enforcement officers related to this case **must be disclosed to the defense** if they are material to the prosecution of the case **or if they contain any evidence that would be in any way favorable to the defense.**

(Emphasis added).

15. In July 2021, DA Stanley assigned Respondent to work on the Morphew case.

16. On July 20, 2021, Respondent and others on the prosecution team disclosed a May 19, 2021, CODIS DNA Casework Match letter containing potentially exculpatory information, which the prosecution had in its possession for two months prior to disclosure.

17. On July 22, 2021, after another hearing on discovery issues, Judge Murphy determined the prosecution had violated discovery rules, by failing to timely provide cell phone data and other electronic discovery to the defense, and ordered further production from the prosecution within seven days.

18. Between July 22 and August 2, 2021, Respondent and others on the prosecution team disclosed a significant amount of information to the defense including: (1) a Tempe CODIS Match letter dated 10/22/20, (2) a Phoenix CODIS Match letter dated 11/19/20, and (3) an Illinois CODIS Match letter dated 4/28/21.

19. In August 2021, Dan Edwards, who at the time was not employed by that district attorney's office, was hired to assist with motions practice in the prosecution of Barry Morphew.

20. Morphew's combined preliminary hearing ("PH") and presumption evident presumption great ("PEPG") hearing was set for August 9-10 and 24-25, 2021.

21. On August 9-10, 2021, during the first two days of Morphew's combined PH and PEPG hearing, defense identified a May 19, 2021 CODIS DNA Casework Match letter regarding DNA swabbed from Suzanne Morphew's Range Rover which partially matched an unknown suspect who was being investigated for sexual assault.

22. The defense team questioned Commander Walker about the May 19, 2021 CODIS DNA Casework Match letter on cross examination.

23. Although Respondent and others on the prosecution team had the May 19, 2021 CODIS DNA Casework Match letter containing potentially exculpatory information in their possession, the letter was not disclosed to the defense until two months later on July 20—only 20 days before the preliminary and PEPG hearing.

24. In October 2021, DA Stanley assigned Respondent to take over as lead counsel on the Morphew case.

25. DA Stanley in her deposition testified,

Q Who was or who were the lead prosecutors on that [Morphew] case, in your mind?

A Jeff Lindsey was definitely the lead prosecutor. After Jeff left, Mark took over that role.

Q And did Mark stay in that role until the case was dismissed?

A Yes.

Q Was there any confusion, do you think, among the attorneys on the case as to who the lead was?

A No.

26. On October 29, 2021, Judge Murphy issued a Case Management Order (“CMO”).

27. The CMO required the prosecution to file its expert disclosures by February 14, 2022, with any supplemental disclosures due by March 21, 2022.

28. The defense’s disclosures were due by March 7, 2022.

29. The CMO, citing Rule 16 Part I (a)(d)(3), required, “These disclosures should include the underlying facts or data supporting the opinion as well as providing a written summary of the testimony describing the witness’ testimony (if no report has been prepared by the expert).”

Respondent Fails to Comply with the CMO and Expert Disclosure Requirements

30. Respondent knew or should have known the Morphew case depended heavily on expert testimony given there was no body to establish murder.

31. Respondent was aware the prosecution’s expert disclosures were due February 14, 2022, per the CMO.

32. Edwards drafted the initial expert disclosures without ever having reviewed the discovery—pulling names only from the pleadings.

33. On February 9, 2022, Edwards sent an email reminding Respondent, Weiner and DA Stanley about the upcoming expert disclosure deadline, and, according to Edwards, he sent the drafts to Respondent for review.

34. Edwards filed the expert disclosures on February 14, but the expert disclosures were inaccurate and incomplete.

35. According to Edwards, Respondent never responded to Edwards’ request to review the draft expert disclosures for accuracy before it was filed.

36. Respondent failed to ensure the prosecution team timely disclosed the CVs and expert reports of prosecution’s experts as required by the court’s order.

37. On February 17, 2022, Edwards reminded Respondent and others on the prosecution team that they failed to file a bill of particulars as required by the court, and as a result defense filed a, “motion to dismiss counts 3 and 5 for failure to comply with order for bill of particulars.”

38. In the same email regarding the bill of particulars, Edwards stated, “It was my understanding that Bob and/or Mark was going to take care of this issue.”

39. On February 24, 2022, the court held a hearing on expert disclosures, during which Respondent and others on the prosecution team conceded their expert disclosures did not comply with Rule 16 or the CMO.

40. Respondent sought and received an extension of time to February 28, 2022, to supplement their expert disclosures.

41. On February 24, 2022, Edwards filed his notice of withdrawal and left the prosecution team.

42. On February 28, 2022, Respondent filed “P-44 People’s Superseding Endorsement of Expert Witnesses” which admitted that some listed experts were still in the process of preparing a statement.

43. Respondent’s superseding expert disclosure, filed February 28, 2022, was still missing expert reports and CVs from various experts, which were specifically required by the court’s prior order.

44. On March 1, 2022, the Morphew defense team filed a “Supplemental Motion to Strike Witnesses Proffered as Experts and Motion to Strike” noting prejudice to Morphew because prosecution still had not included an expert CV, expert opinion or written summaries, for several experts and provided no underlying facts or data supporting the opinion.

45. On March 2, 2022 the defense team filed a “Supplement to Motion to Strike Proposed Expert Witnesses.”

46. On March 3, 2022, the prosecution provided additional discovery including emails with law enforcement created as far back as May 2020, which the prosecution obtained during November 2021 and January 18, 2022.

47. On March 7, 2022, well-after the extended expert supplemental disclosure deadline, Respondent filed a “Good Faith Witness List” and “Notice of Endorsement of Witness.”

48. On March 8, 2022, the defense team filed a “Supplement to Motion for Discovery Sanctions” based on the prosecution’s February 28 and March 3, 2022 discovery production.

49. On March 9, 2022, Respondent filed the prosecution’s response to the defense team’s motion to strike witnesses proffered as experts, arguing that Morphew was not prejudiced by the inadequate expert disclosures.

50. On March 10, 2022, the court issued a verbal order striking several prosecution experts finding that Respondent and others on the prosecution team failed to comply with Rule 16 and Court Orders:

The court finds a pattern of neglect demonstrating a need for modification of a party's discovery practices in this case... this is trial by ambush. That's exactly what the rules are designed to prevent. And I'm not finding it willful, but I'm finding a pattern and I'm finding prejudice. There's a record to support a pattern of neglect here and prejudice.

51. On March 30, 2022, DDA Grant Grosgebauer, who had only recently joined the Morphew prosecution team, attended and participated in a *Shreck* hearing on the qualifications and scope of opinion of expert Doug Spence.

52. The night before the hearing, Grosgebauer called Spence to prepare him for the hearing, and at that point learned that no one on the prosecution team had actually spoken to expert Spence.

53. Spence expressed opinions during his telephone conversation with DDA Grosgebauer the night before the *Shreck* hearing that were not entirely consistent with what had been included in the prosecution's expert endorsement, reviewed and supplemented by Respondent.

54. The prosecution's initial and supplemental expert endorsement for Spence had indicated that Spence would offer an opinion based on a law enforcement canine, Rosco, following a scent down to a creek in the direction of the Morphew home, but this was not consistent with what Spence told Grosgebauer the night before the *Shreck* hearing.

55. In addition, on cross-examination of Spence, the defense elicited that Spence had, in fact, authored his own report of his investigation, which he had not provided previously.

56. At that point, the *Shreck* hearing focused on a possible Rule 16/discovery violation for prosecution's failure to disclose an endorsed expert's report.

57. DDA Grosgebauer acknowledged in court that because Respondent and others on the prosecution team had endorsed Spence as an expert but failed to turn over Spence's report (of which Grosgebauer reported he had no prior knowledge), the prosecution was not in compliance with Rule 16.

58. Respondent's failure to interview Spence or ensure another prosecution team member interviewed Spence before endorsing him as an expert led to the failure to timely identify and disclose Spence's expert report.

59. Respondent's failure to interview Spence or ensure another prosecution team member interviewed Spence before endorsing him as an expert led to Respondent including inaccurate information in the expert endorsement filed by Respondent.

60. DDA Grosgebauer proposed that the remedy was for the Court to strike Spence as a witness.

61. The Court agreed and on March 30, 2022, the court excluded expert witness Spence based upon the stipulation of the People that they had failed to disclose the opinion or report of their own expert.

62. On April 8, 2022, the court granted another one of the defense team’s motions for sanctions for discovery violations, and determined:

the People failed to put in place a system to preserve emails as ordered by Judge Murphy on June 3... The Court finds a continuing pattern by the People of an inability and failure to comply with its Rule 16 obligations as well as the Court's case management orders...

63. In the same order issued April 8, 2022, the court excluded most of the prosecution’s experts, finding:

the People's actions amount to negligent, and arguably, reckless disregard for their Rule 16 obligations and duty to abide by court orders... the court excludes 11 out of 16 of the People's endorsed expert witnesses [a sanction] warranted based upon the record... The case is set for trial to begin on April 28, 2022.

64. Altogether, of the 16 experts initially endorsed by Respondent and others on the prosecution team, 15 had been excluded altogether, and one had their scope of testimony reduced.

Respondent Participates in an Investigation of Judge Lama after Series of Adverse Rulings

65. On March 10, Respondent texted the prosecution team:

Do all of you have some time to talk tonight? Judge is messing with us again.

Linda Stanley: Maybe. Still in trial now.

Respondent: I was thinking another 7:00 call.

Linda Stanley: I guess I will have to see what happens. But I'll let you know.

Respondent: Apparently we had to point out page numbers on our expert reports to the defense.

...

Linda Stanley: You can call me even if no one else is available.

Respondent: Will do.

66. On March 12, 2022, Stanley texted the Morphew prosecution team¹ (now Hurlbert, Weiner and Grosgebauer) a petition started by Julez Wolf (recall “True Crime with Julez”).

¹ The prosecution team had a group text chat thread where all members could text and see each other’s texts, attached as Exhibit A.

67. The petition written by Julez Wolf, claimed “the ex-wife of Judge Lama is an advocate of Suzanne Morpew and victims of Domestic abuse.”

68. Stanley texted Respondent and the other prosecutors as follows:

Linda Stanley: You guys might want to read this... [attached petition started by Julez Wolf titled “Help Give Suzanne Her Voice!”]

Respondent: That is very interesting. I was thinking about a motion to recuse

Linda Stanley: I think we should. But I’m not sure how true it is. I can tell you that I have heard this rumor before. Long before Barry Morpew. But it could DEFINITELY explain why he hates us so much.

Bob Weiner: Holy crap!! Yes let’s go after him! He should have disclosed this. We need to confirm asap.

Linda Stanley: I can get an investigator on it.

Bob Weiner: Lets pull his divorce case.

Respondent: He is obviously biased. I have realized him asking me about the bated numbers on the expert reports was because he didn’t believe me when I said we gave the defense reports.

Linda Stanley: Wow.

Bob Weiner: He should not be on the bench.

Linda Stanley: I looked into this organization, change dot org. Anyone can start a petition. So we don’t know if any of it is true. The only way to know is to talk to his ex-wife. And BTW, he has custody of his kid.

Bob Weiner: Need to pull that divorce case.

Linda Stanley: I thought you can’t get copies of that stuff unless you are a party to the case.

Respondent: I didn’t think so either.

Bob Weiner: Maybe start with interviewing her.

Respondent: I agree.

Linda Stanley: Ok. But the person who started the petition is Julez Wolf. She has a YouTube channel. I’m not sure that’s a credible source.

Linda Stanley: Alliance Against Domestic Abuse – 1055 E. Highway 50, Salida, CO 81201. (Screenshot of Alliance Against Domestic Abuse website)

Linda Stanley: She goes by Iris Diaz now

Linda Stanley: And she's friends with Shoshana!

(Screenshots and pictures)

Linda Stanley: All kinds of reasons for recusal, in my opinion.

Bob Weiner: He should have disclosed this!

Respondent: We need to find some time to talk about this. Tonight? And I think I ought to bring in Michelle.

Linda Stanley: Yes and yes.

(redacted)

Linda Stanley: I also have asked an investigator to look into the other information I sent everyone.

69. Respondent did not voice disapproval of DA Stanley's plan to have an investigator interview Iris Lama because he felt that Judge Lama was biased against him.

70. In March 2022, DA Stanley and Weiner called Commander Walker at the Chaffee County Sheriff's Office and asked if Walker had an investigator to investigate an allegation of prior domestic abuse by Judge Lama.

71. Respondent was aware that Commander Walker refused to investigate Judge Lama, telling DA Stanley she had no good source for the investigation.

72. On April 7, 2022, DA Stanley emailed Respondent and others and informed them that investigator Andrew Corey, who worked for Respondent's office, was going to interview Iris Lama regarding Judge Lama.

73. Respondent did not object when DA Stanley enlisted the office's own investigator to interview Judge Lama's former wife.

74. On April 9, 2022, the day after the expert disclosures sanctions order and 19 days before the scheduled commencement of the Morphew trial, Investigator Corey met with DA Stanley, Respondent, and Weiner and wrote in his notes that DA Stanley wanted to find out if Judge Lama had spoken to Iris Lama about the Morphew case, and whether domestic violence had occurred during their relationship.²

75. At the April 9 meeting, Respondent again did not attempt to convince DA Stanley to back off her request to Investigator Corey, nor did he voice disapproval.

76. A week later, on April 15, 2022 investigator Corey interviewed Iris Lama.

² Corey's notes and report are attached as Ex. B.

77. Investigator Corey reported that Iris Lama told him there was never any domestic abuse in their relationship, and that Judge Lama never said anything to her about the Morphew case.

78. On April 19, 2022, the prosecution team moved to dismiss case at the pretrial readiness conference, which was nine days before the trial was scheduled to begin.

79. The court granted the motion and dismissed the Morphew case without prejudice.

CLAIM I

[A Lawyer Shall Act with Reasonable Diligence and Promptness—Colo. RPC 1.3]

80. Colo. RPC 1.3 states that a lawyer shall act with reasonable diligence and promptness in representing a client.

81. Respondent failed to timely and completely comply with the requirements of Rule 16 and the CMO concerning the strategically vital expert disclosures.

82. Even after the court granted the prosecution additional time to supplement their expert disclosures Respondent failed to diligently or promptly comply with the expert disclosure requirements.

83. Respondent failed to ensure that a member of the prosecution team spoke with expert Spence prior to the disclosures being filed and supplemented, resulting in inaccurate disclosures and a surprise, undisclosed written report of expert Spence.

84. As a result of that lack of diligence, the prosecution's expert disclosures to Morphew were untimely, incomplete and inaccurate.

85. As a sanction for violating the court's expert disclosure order, 15 of the 16 experts tendered by the prosecution were stricken and only one was permitted to testify as an expert.

86. By such conduct, and in each instance described above, Respondent violated Colo. RPC 1.3.

WHEREFORE, the Complainant prays at the conclusion of this Complaint.

CLAIM II

[Attempt to Violate the Rules of Professional Conduct and Conduct Prejudicial to the Administration of Justice—Colo. RPC 8.4(a) and Colo. RPC 8.4(d)]

87. Colo. RPC 8.4(a) prohibits a lawyer from attempting to violate the Rules of Professional Conduct, knowingly assisting or inducing another to do so, or doing so through the acts of another.

88. Colo. RPC 8.4(d) prohibits a lawyer from engaging in conduct that is prejudicial to the administration of justice.

89. Respondent confirmed or agreed with the prosecution team's decision to enlist the office's own investigator, Corey, to interview the former wife of Judge Lama, who was presiding over the Morphew case.

90. Respondent did so in an effort to uncover information about Judge Lama that would be cause for his recusal or disqualification from continuing to preside over the Morphew case.

91. Respondent took this approach despite having no credible source for suspecting that Judge Lama had physically abused his ex-wife, or other conduct that would justify a criminal investigation.

92. Respondent used his position in a manner intended to prevent others, including Judge Lama, from effectively performing their roles in the criminal justice system.

93. Respondent's actions constituted of an abuse of power and were contrary to a prosecutor's responsibility to act as a minister of justice.

94. Through his actions, Respondent acted in a manner that constituted an attempt to prejudice the administration of justice, and also was prejudicial to the administration of justice.

95. By such conduct, Respondent violated Colo. RPC 8.4(a) and 8.4(d).

WHEREFORE, the Complainant prays at the conclusion of this Complaint.

WHEREFORE, the People pray that the Respondent be found to have engaged in misconduct under C.R.C.P. 242.9 and the Colorado Rules of Professional Conduct as specified above; the Respondent be appropriately disciplined for such misconduct; the Respondent be required to take any other remedial action appropriate under the circumstances; and the Respondent be assessed the costs of this proceeding.

DATED this 15th day of February, 2024.

Respectfully submitted,



Erin Robson Kristofco, #33100
Senior Assistant Regulation Counsel
Jonathan Blasewitz, #48277
Assistant Regulation Counsel
Jessica E. Yates, #38003
Attorney Regulation Counsel

Attorneys for Complainant

4:16



3 People >

iMessage
Mar 9, 2022 at 6:46 PM

Mark Hurlbert

MH

Still on for 7. I will call each of you.

Bob Weiner

BW

Thanks

Mar 10, 2022 at 12:48 PM

Mark Hurlbert

MH

Do all of you have some time to talk tonight? Judge is messing with us again.

Linda Stanley

LS

Maybe. Still in trial now.

Mark Hurlbert

MH

I was thinking another 7:00 call.

Linda Stanley

LS

I guess I will have to see what happens. But I'll let you know.

Mar 10, 2022 at 2:38 PM

Mark Hurlbert

MH

Apparently we had to point out page numbers on our expert reports to the defense.



iMessage



Exhibit A
03406







 3 People >

MH: Apparently we had to point out page numbers on our expert reports to the defense.

Mar 10, 2022 at 4:33 PM

Linda Stanley

I'm on my way home now from Park County. My jury trial is over.

LS: Guilty on everything.

Mark Hurlbert

MH: Congrats.

Mar 10, 2022 at 6:56 PM

Linda Stanley



LS: You can call me even if no one else is available

Mark Hurlbert

MH: Will do.

Mar 12, 2022 at 1:59 PM

Linda Stanley


Screenshot
 2022-03-12
 at 13.59.00.j... 
 JPEG Image · 566 KB

Here's the response I received



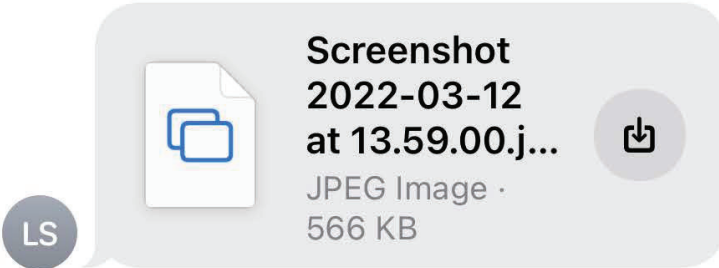
 iMessage 



3 People >



Linda Stanley



LS

Here's the response I received from Mike. I haven't responded yet because I wanted to see if Bob had yet and/or make sure we are all on the same page before I answer.

Mar 12, 2022 at 4:21 PM

Bob Weiner

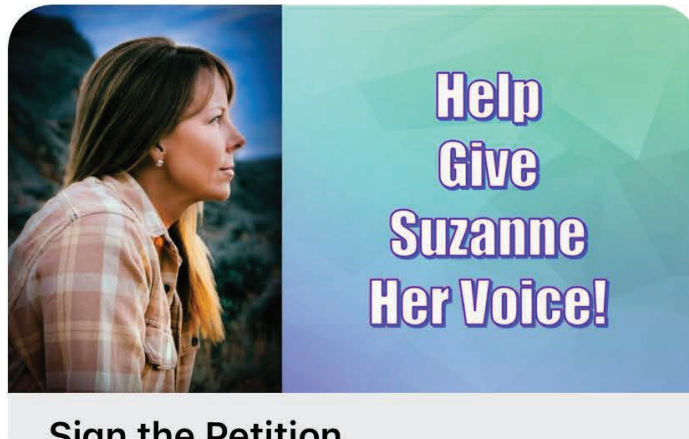
BW

I have called Michael left him a voicemail I am waiting to hear back

Sent with Siri

Mar 12, 2022 at 7:51 PM

Linda Stanley



iMessage





3 People >

LS: You guys might want to read this ...

Mark Hurlbert

MH: That is very interesting. I was thinking about a motion to recuse.

Linda Stanley

I think we should. But I'm not sure how true it is. I can tell you that I have heard this rumor before. Long before Barry Morphew.

LS: But it could DEFINITELY explain why he hates us so much.

Bob Weiner

BW: Holy crap!! Yes let's go after him! He should have disclosed this. We need to confirm asap.

Linda Stanley

LS: I can get an investigator on it.

Bob Weiner

BW: Let's pull his divorce case

Linda Stanley

LS: But we still need to appeal him.



iMessage





3 People >



Bob Weiner

BW

Let's pull his divorce case

Linda Stanley

LS

But we still need to appeal him.

Mark Hurlbert

MH

Yes we do.

Bob Weiner

BW

Hell yes and put this in the appeal!!

Mark Hurlbert

MH

He is obviously biased. I have realized him asking me about the bated numbers on the expert reports was because he didn't believe me when I said we gave the defense reports.

Linda Stanley

LS

Wow.

Bob Weiner

BW

He should not be on the bench

Linda Stanley

I looked into this organization, change dot org. Anyone can start a petition. So we don't know if any of it is true. The only



iMessage





3 People >

Linda Stanley

I looked into this organization, change dot org. Anyone can start a petition. So we don't know if any of it is true. The only way to know is to talk to his ex-wife. And BTW, he has custody of his kid.

LS

Bob Weiner

Need to pull that divorce case

BW

Linda Stanley

I thought you can't get copies of that stuff unless you are a party to the case

LS

Mark Hurlbert

I didn't think so either.

MH

Bob Weiner

Maybe start with interviewing her

BW

Mark Hurlbert

I agree.

MH

Linda Stanley

Ok. But the person who started the petition is Julez Wolf. She has a YouTube channel. I'm not sure that's a credible source.

LS



iMessage





3 People >



Linda Stanley

Ok. But the person who started the petition is Julez Wolf. She has a YouTube channel. I'm not sure that's a credible source.

LS

Mar 13, 2022 at 12:37 PM

Linda Stanley

Alliance Against Domestic Abuse · 1055 E Highway 50, Salida, CO 81201, UNI...
opengovus.com



IMG_5914.jpe
g
JPEG Image · 433 KB



IMG_5915.jpe
g
JPEG Image · 279 KB



LS



**275105027_11
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427_64374...**
Image · 170 KB



LS

She goes by Iris Diaz now.



Screenshot (962).jpeg
JPEG Image · 89



iMessage

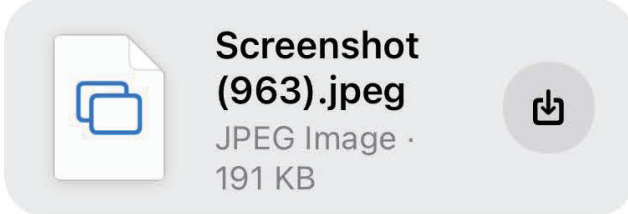
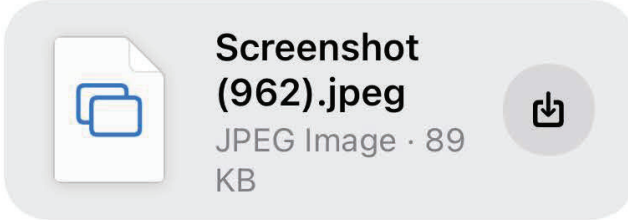




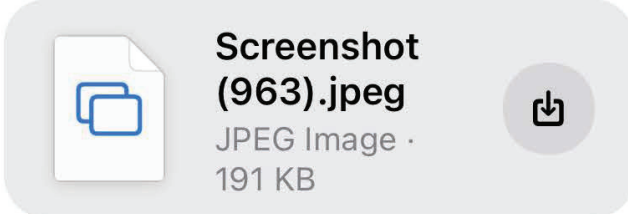
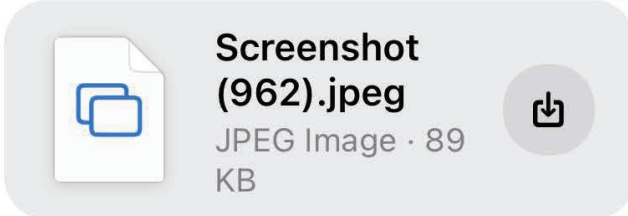
3 People >



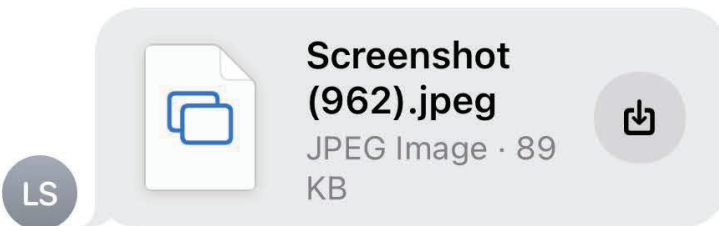
LS She goes by Iris Diaz now.



And she's friends with Shoshana!



LS All kinds of reasons for recusal, in my opinion.



Mar 13, 2022 at 2:05 PM

Bob Weiner



iMessage





3 People >

Mar 13, 2022 at 2:05 PM

Bob Weiner

BW He should have disclosed this!!

Mar 14, 2022 at 9:17 AM

Mark Hurlbert

MH We need to find some time to talk about this. Tonight? And I think I ought to bring in Michelle.

Linda Stanley

LS Yes and Yes.

LS Do we have anyone for the appeal yet?

Mark Hurlbert

MH Not from me. I have been playing phone tag with Shapiro at AGs Office

Bob Weiner

BW Michael called me this morning but I was already in court. I texted him back

Linda Stanley

I just reached out to several more people on getting an appellate attorney. I'll let you guys know



iMessage





Office of the District Attorney, 11th Judicial District

INVESTIGATOR'S REPORT
136 JUSTICE CENTER ROAD
CANON CITY, CO 81212
APRIL 12, 2022

Case Number: N/A

Agency: 11th Judicial District Attorney's Office

Victim: N/A

Defendant: N/A

On 4/9/22 I was asked to speak with Iris Lama, by District Attorney Linda Stanley. Iris Lama is the ex-wife of District Judge Ramsey Lama. District Attorney Stanley wanted me to speak with Iris to make sure Judge Lama had not spoken to Iris about anything that would make him impartial to the Barry Morphew case and if any Domestic Violence had occurred in the relationship. Iris agreed to meet with me in person at DR Lund's Clinic 205 G street in Salida Colorado on 04/15/2022 at 9am.

On 4/15/2022 at approximately 0900 hours I spoke with Iris Lama at 205 G street in Salida Colorado. Iris told me that Judge Ramsey Lama maintained a high level of professionalism and had never said anything about the Barry Morphew case. Iris also stated never did any type of Domestic abuse happen in the relationship.

My recording of this conversation was lost, so I referred to my notes for this report. My investigation into this matter is complete and nothing was found of any wrongdoing.

Nothing further at this time.

Andrew Corey

Criminal Investigator

Office of the District Attorney

11th Judicial District

(719) 239-1497

Exhibit B
03415