

District Court, Weld County, Colorado Court address: 901 9 th Avenue, Greeley, CO 80631	DATE FILED: November 5, 2018 9:26 AM
PEOPLE OF THE STATE OF COLORADO, Plaintiff v. CHRISTOPHER WATTS, Defendant	▲ COURT USE ONLY ▲
John Walsh, Atty. Reg. No. 42616 Kathryn Herold, Atty. Reg. No. 40075 Deputy State Public Defenders 822 7th Street, Ste. 300 Greeley, CO 80631 Phone Number: (970) 353-8224 FAX Number: (970) 352-8293 E-mail address: john.walsh@coloradodefenders.us	Case Number: 18CR2003 Division: 5
(D-042) MR. WATTS' OBJECTION TO REQUEST FOR EXPANDED MEDIA COVERAGE FILED BY DENVER 7 NEWS	

CHRISTOPHER WATTS, through his attorneys, hereby objects to the request for expanded media coverage filed by Denver 7 News. As grounds for this objection, Mr. Watts states:

1. Mr. Watts is set for a status hearing on November 6, 2018.
2. Media coverage of court proceedings is governed by Colorado Supreme Court Rules, Chapter 38, Rule 3, Media Coverage of Court Proceedings.
3. Pursuant to Rule 3, "in determining whether expanded media coverage should be permitted, a judge shall consider the following factors:
 - (A) Whether there is a reasonable likelihood that expanded media coverage would interfere with the rights of the parties to a fair trial;
 - (B) Whether there is a reasonable likelihood that expanded media coverage would unduly detract from the solemnity, decorum, and dignity of the court; and
 - (C) Whether expanded media coverage would create adverse effects which would be greater than those caused by traditional media coverage."

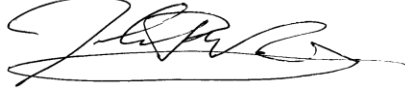
Colo. R. Pub. Acc. Rec. & Info. Rule 3(a)(2).
4. Expanded media coverage will unduly detract from the solemnity, decorum, and dignity of the court. The media coverage in this case has been rabid, far-reaching, and, at times, speculative. When the court allows expanded media into the courtroom, it gives its tacit approval to the mania that expanded media helps create.
5. Expanded media coverage would create adverse effects that would be greater than those caused by traditional media coverage.

6. To be clear, Mr. Watts is not objecting to traditional print-media coverage that is inherent in public proceedings.
7. Expanded media coverage would prejudice Mr. Watts in the following ways:
 - (A) Photographs of Mr. Watts in custody, handcuffed, and in protective clothing are inherently prejudicial and unnecessary. This court has previously allowed for such photographs. Allowing additional coverage of Mr. Watts in custody, handcuffed and in protective clothing will only continue to prejudice Mr. Watts' rights to a fundamentally fair proceeding. COLO. CONST. art. II, §§ 16, 18, 23, and 25; U.S. CONST. amends. V, VI, and XIV.
 - (B) There has already been substantial media coverage in Mr. Watts' case. The unusual amount of information has the potential to create additional prejudice against Mr. Watts and to violate his rights to a fundamentally fair proceeding consistent with his rights to due process of law under the Colorado and United States Constitutions. COLO. CONST. art. II, §§ 16, 18, 23, and 25; U.S. CONST. amends. V, VI, and XIV.
8. If additional requests for expanded media come in today, Mr. Watts respectfully asks that this objection apply to those requests, as well.

WHEREFORE, Mr. Watts moves this Court to deny the request for expanded media coverage.

Respectfully submitted,

MEGAN RING
COLORADO STATE PUBLIC DEFENDER



John Walsh, Atty. Reg. No. 42616



Kathryn Herold, Atty. Reg. No. 40075
Deputy State Public Defenders

CERTIFICATE OF SERVICE

I hereby certify that on
11/5/18, I served the foregoing document
by e-service through ICCES to all opposing
counsel. TC