

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
STATE OF COLORADO
Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

THEODORE ROBERT BUNDY,
Defendant.

O R D E R

On July 14, 1977, Defendant's Motion for a Certificate Requesting Subpoenas for Witnesses and Tangible Evidence from Another State wa heard. The Court has considered the information before it related thereto, and FINDS THAT:

1. From the information filed by the Defendant, it appears that PAUL FORBES is a material witness in the above-entitled action which comes on for a motion to suppress evidence hearing at 9:00 a.m. on August 23, 24, and 25, 1977. Furthermore, it appears that PAUL FORBES has in his possession or control documentary evidence which is alos material and relevant to said hearing.
2. PAUL FORBES currently resides in Murray, Utah, a distance of Four Hundred Fifty (450) miles from Aspen, Colorado.
3. Pursuant to C.R.S. 16-9-203, a material witness subpoenaed from another state is to be tendered Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the court where the prosecution is pending, and Twenty Dollars (\$20.00) for each day that he or she is required to travel and attend as a witness.
4. On the basis of the mileage involved and the time

required for attendance of PAUL FORBES, it is determined that he should receive the amount of One Hundred and Fifty Dollars (\$150.00) to attend and testify in the above entitled action.

IT IS ORDERED THAT a certificate for out-of-state witness PAUL FORBES shall be issued requesting his attendance at said hearing and the production by him of certain tangible evidence relevant thereto.

IT IS FURTHER ORDERED that a check in the amount of One Hundred Fifty Dollars (\$150.00) be drawn as witness fees on the account of the State of Colorado, and be made payable to PAUL FORBES.

Done this _____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge.

results of Federal Bureau of Investigation Laboratory examination of physical evidence submitted to it in connection with the Daronch investigation (including fingerprint examination and comparison on latent prints taken from handcuffs placed on Ms. Daronch); information concerning attempts to have the victim, Carol Daronch, identify suspects in her abduction as well as suspect vehicles; and records of statements made by Ms. Daronch relating to her abduction and descriptions given by her of her alleged abductor and the vehicle allegedly used by him.

5. It is understood that the witness will be tendered the sum of Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the Pitkin County District Court, and Twenty Dollars (\$20.00) for each day that he is required to travel and attend as a witness.

6. If PAUL FORBES comes into this state in obedience to a summons directing him to attend and testify in the above-entitled action, he shall not, while in this state pursuant to such summons, be subjected to arrest or the service of process, civil or criminal, in connection with matters which arose before his entrance into this state.

7. The witness will be required to travel from Murray, Utah, to Aspen, Colorado, a distance of approximately Four Hundred Fifty (450) miles.

8. This certificate has been issued for the purpose of being presented to a Judge in the Third Judicial District Court in and for the County of Salt Lake, State of Utah, where said PAUL FORBES now is, upon proceedings to compel the said PAUL FORBES to attend and testify in the above-entitled action.

Done this _____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

concerning attempts to have the victim, Carol DaRonch, identify suspects in her abduction as well as suspect vehicles; record of any statement made by Theodore Robert Bundy solicited in connection with the DaRonch investigation; and record of statements made by Ms. DaRonch relating to her abduction and descriptions given by her of her alleged abductor and the vehicle allegedly used by him.

5. It is understood that the witness will be tendered the sum of Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the Pitkin County District Court, and Twenty Dollars (\$20.00) for each day he is required to travel and testify as a witness.

6. If BEN FORBES comes into this state in obedience to a summons directing him to attend and testify in the above-entitled action, he shall not, while in this state pursuant to such summons, be subjected to arrest or the service of process, civil or criminal, in connection with matter which arose before his entrance into this state.

7. The witness will be required to travel from Salt Lake City, Utah, to Aspen, Colorado, a distance of approximately Four Hundred Fifty (450) miles.

8. This certificate has been issued for the purpose of being presented to a Judge in the Third Judicial District Court in and for the County of Salt Lake City, State of Utah, where BEN FORBES now is, upon proceedings to compel the said BEN FORBES to attend and testify in the above-entitled action.

Done this _____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

Respectfully Submitted,

Theodore Robert Bandy
Pro Se
Garfield County Jail
Glenwood Springs, Colorado 81601
Phone: (303) 945-9151

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
STATE OF COLORADO
Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,
Plaintiff,

THEODORE ROBERT BUNDY,
Defendant.

vs.

O R D E R

On July 14, 1977, Defendant's Motion for a Certificate Requesting Subpoenas for Witnesses and Tangible Evidence from Another State was heard. The Court has considered the information before it related thereto, and FINDS THAT:

1. From the information filed by the Defendant, it appears that BEN FORBES is a material witness in the above-entitled action which comes on for hearing on a motion to suppress evidence at 9:00 a.m. on August 23, 24, and 25, 1977. Furthermore, it appears that BEN FORBES has in his possession or control documentary evidence which is also material and relevant to said hearing.
2. BEN FORBES currently resides on the Salt Lake City, Utah, area, a distance of Four Hundred Fifty (450) miles from Aspen, Colorado.
3. Pursuant to C.R.S. 16-9-203, a material witness subpoenaed from another state is to be tendered the sum of Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the court where the prosecution is pending, and Twenty Dollars (\$20.00) for each day that he or she is required to travel and testify as a witness.
4. On the basis of the mileage involved and the time

required for attendance of BEN FORBES, it is determined that he should receive the amount of One Hundred Fifty Dollars (\$150.00) to attend and testify in the above-entitled action.

IT IS ORDERED THAT a certificate for out-of-state witness BEN FORBES shall be issued requesting his attendance at said hearing and the production by him of certain tangible evidence related thereto.

IT IS FURTHER ORDERED that a check in the amount of One Hundred Fifty Dollars (\$150.00) be drawn as witness fees on the account of the State of Colorado, and be made payable to BEN FORBES.

Done this _____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

travel and testify in this matter.

6. If BOB WARNER comes to this state in obedience to a summons directing him to attend and testify in the above-entitled action, he shall not, while in this state pursuant to such summons, be subjected to arrest or the service of process, civil or criminal, in connection with matters which arose before his entrance into this state.

7. The witness will be required to travel from Salt Lake City, Utah, a distance of Four Hundred Fifty (450) miles from Aspen, Colorado.

8. This certificate has been issued for the purpose of being present to a Judge of the Third Judicial District Court in and for the County of Salt Lake, State of Utah, where BOB WARNER now is, upon proceeding to compel the said BOB WARNER to attend and testify in the above-entitled action.

BY THE COURT:

George E. Lohr
District Court Judge

required for attendance of BOB WARNER, it is determined that he should receive the amount of One Hundred Fifty Dollars (\$150.00) to attend and testify in the above-entitled action.

IT IS ORDERED THAT a certificate for out-of-state witness BOB WARNER shall be issued requesting his attendance at said hearing and the production by him of certain tangible evidence relevant thereto.

IT IS FURTHER ORDERED that a check in the amount of One Hundred Fifty Dollars (\$150.00) be drawn as witness fees on the account of the State of Colorado, and be made payable to BOB WARNER.

Done this ____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
STATE OF COLORADO
Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,
Plaintiff,

vs.

THEODORE ROBERT BUNDY,
Defendant.

A R P I D A V I T

BOB WARNER is employed by the Salt Lake County Sheriff's Office, Salt Lake City, Utah, a distance of Four Hundred Fifty (450) miles from Aspen, Colorado, and his presence is needed for three (3) days: August 23, 24, and 25, 1977, in order that he may testify in and produce tangible evidence for a motion to suppress evidence hearing.

His testimony will relate to events which took place prior to and during a search on August 21, 1975, of an apartment occupied by Theodore Robert Bundy.

WHEREFORE, it would appear to affiant that BOB WARNER is an essential and material witness to the allegations set forth in Defendant's motion to suppress evidence seized during and testimony concerning the search mentioned above.

Respectfully Submitted,

Theodore Robert Bundy
Pro Se
Garfield County Jail
Glenwood Springs, Colorado 81601
Phone: (303) 945-9151

Information concerning attempts to have the victim, Carol Daronch, identify suspects in her abduction as well as suspect vehicles; and records of statements made by Ms. Daronch relating to her abduction and descriptions given by her of her alleged abductor and the vehicle allegedly used by him.

5. It is understood that the witness will be tendered the sum of Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the Pitkin County District Court, and Twenty Dollars (\$20.00) for each day that he is required to travel and attend as a witness.

6. If JOEL RIEFF comes into this state in obedience to a summons directing him to attend and testify in the above-entitled action, he shall not, while in this state pursuant to such summons, be subjected to arrest or the service of process, civil or criminal, in connection with matters which arose before his entrance into this state.

7. The witness will be required to travel from Murray, Utah, to Aspen, Colorado, a distance of approximately Four Hundred Fifty (450) miles.

8. This certificate has been issued for the purpose of being presented to a Judge in the Third Judicial District Court in and for Salt Lake County, State of Utah, where said JOEL RIEFF now is, upon proceedings to compel the said JOEL RIEFF to attend and testify in the above-entitled action.

Done this _____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

required for attendance of JOEL RIEFT, it is determined that he should receive the amount of One Hundred Fifty Dollars (\$150.00) to attend and testify in the above-entitled action.

IT IS ORDERED THAT a certificate for out-of-state witness JOEL RIEFT shall be issued requesting his attendance at said hearing and the production by him of certain tangible evidence relevant thereto .

IT IS FURTHER ORDERED that a check in the amount of One Hundred Fifty Dollars (\$150.00) be drawn as witness fees on the account of the State of Colorado, and be made payable to JOEL RIEFT.

Done this _____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

Respectfully Submitted,

Theodore Robert Bundy
Pro Se
Garfield County Jail
Glenwood Springs, Colorado 81601
Phone: (303) 945-9151

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
STATE OF COLORADO
Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

THEODORE ROBERT BUNDY,

Defendant.

ORDER

On July 14, 1977, Defendant's Motion for a Certificate Requesting Subpoenas for Witnesses and Tangible Evidence from Another State was heard. The Court has considered the information before it related thereto, and FINDS THAT:

1. From the information filed by the Defendant, it appears that DAVID YOCOM is a material witness in the above-entitled action which comes on for a motion to suppress evidence hearing at 9:00 a.m. on August 23,24, and 25, 1977. Furthermore, it appears that DAVID YOCOM has in his possession or control, or has access to documentary evidence which is also material and relevant to said hearing.
2. DAVID YOCOM currently resides in the Salt Lake City area of Salt Lake County, Utah, a distance of Four Hundred Fifty (450) miles from Aspen, Colorado.
3. Pursuant to C.R.S. 16-9-203, a material witness subpoenaed from another state is to be tendered Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the court where the prosecution is pending, and Twenty Dollars (\$20.00) for each day that he or she is required to travel and attend as a witness.
4. On the basis of the mileage involved and the time

required for attendance of DAVID YOCOM, it is determined that he should receive the amount of One Hundred and Fifty Dollars (\$150.00) to attend and testify in the above-entitled action.

IT IS ORDERED THAT a certificate for out-of-state witness DAVID YOCOM shall be issued requesting his attendance at said hearing and the production by him of documents and tangible evidence relevant thereto.

IT IS FURTHER ORDERED that a check in the amount of One Hundred Fifty Dollars (\$150.00) be drawn as witness fees on the account of the State of Colorado, and be made payable to DAVID YOCOM.

Done this _____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
STATE OF COLORADO
Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

THEODORE ROBERT BUNDY,
Defendant.

CERTIFICATE OF JUDGE
REQUESTING ATTENDANCE OF
AND PRODUCTION OF DOCUMENTARY
EVIDENCE BY OUT-OF-STATE
WITNESS PURSUANT TO
C.R.S. 16-9-203

I, George E. Lohr, Judge of the Pitkin County District Court, State of Colorado, to hereby certify:

1. There will be a hearing on a motion to suppress evidence in the above-entitled action in the Pitkin County District Court, 506 E. Main Street, Aspen, Colorado, at 9:00 a.m. on the 23rd, 24th and 25th of August, 1977.
2. The undersigned is informed by the Defendant that DAVID YOCOM is a necessary and material witness for the Defense in this matter.
3. DAVID YOCOM is to be called to testify at 9:00 a.m. on the 23rd, 24th, and 25th days of August, 1977, and his presence will be required for three (3) days.
4. DAVID YOCOM is also to produce at said time and place any document, report, or other evidence which may tend to exculpate Theodore Robert Bundy from involvement in the kidnaping of Carol DaRonch from the Fashion Place Mall on November 8, 1974, and the disappearance and death of Caryn Campbell in Snowmass, Colorado, in January, 1975; reports made by him and statements of witnesses made to him concerning the kidnaping of Ms. DaRonch; information concerning attempts

to have the victim, Carol DaRonch, identify suspects in her abduction as well as attempts to have her identify suspect vehicles (including Ms. DaRonch's response to a line-up held on October 2, 1975); records of statements made by Ms. DaRonch relating to her abduction and the descriptions given by her of her alleged abductor and the vehicle allegedly used by him; and subpoenas, affidavits, transcripts of testimony, search warrants, search warrant returns, reports or other documents dealing with a search on August 16, 1975, of a 1968 Volkswagen automobile owned by Theodore Robert Bundy; a search of Mr. Bundy residence at 565 1st Avenue on August 21, 1975; a search of Mr. Bundy's residence at 364 Douglas Street on October 2, 1975; and the seizure of a 1968 Volkswagen sedan on October 3, 1975. The material and information requested extends not only to that which is in DAVID YOCOM's possession or control, but that which is in the possession or control of law enforcement agencies that assisted in the investigation of the DaRonch kidnapping.

5. It is understood that the witness will be tendered the sum of Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the Pitkin County District Court, and Twenty Dollars (\$20.00) for each day he is required to travel and attend as a witness.

6. If DAVID YOCOM comes into this state in obedience to a summons directing him to attend and testify in the above-entitled action, he shall not, while in this state pursuant to such summons, be subjected to arrest or the service of process, civil or criminal, in connection with matters which arose before his entrance into this state.

7. The witness will be required to travel from Salt

Lake City, Utah, to Aspen, Colorado, a distance of approximately Four Hundred Fifty (450) miles.

8. This certificate has been issued for the purpose of being presented to a Judge in the Third Judicial District Court in and for the County of Salt Lake, State of Utah, where DAVID YOCOM now is, upon proceedings to compel the said DAVID YOCOM to attend and testify in the above-entitled action.

Done this _____ day of July, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

9-13-77
MKR

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

THEODORE ROBERT BUNDY,

Defendant.

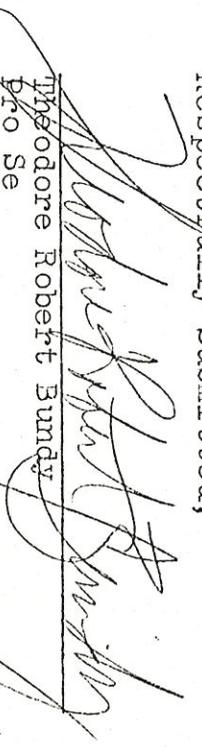
A F F I D A V I T

The Keeper of Records for the Division of Adult Probation and Parole, State of Utah, is located in the Social Services Building, Salt Lake City, Utah, a distance of four hundred fifty (450) miles from Aspen, Colorado. This person's presence will be required on September 20, 1977.

The Keeper of Records is to produce a presentence report concerning defendant which contains an interview with Carol DaRonch. In this interview Ms. DaRonch discusses her recollection of certain pretrial identification procedures which defendant believes caused her to misidentify him in a line-up held on October 2, 1975. Adult Probation and Parole personnel refused to give the defendant or his counsel a copy of the presentence report. Neither defendant nor his counsel have had an opportunity to read this report. However, a social worker ~~at~~ the Utah State Prison did give defendant a synopsis of Ms. DaRonch's comments contained in the report, and these comments would be useful and relevant to defendant's attempt to prove that Ms. DaRonch's identification of him was a product of constitutionally impermissible suggest causing substantial likelihood of misidentification.

Defendant believes he has a right to this report and that it would be a material aid in the forthcoming suppression hearing.

Respectfully Submitted,


Theodore Robert Bundy
Pro Se
Garfield County Jail
Glenwood Springs, Colorado 81601

9-13-77
MKB

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

THEODORE ROBERT BUNDY,

Defendant.

O R D E R

The Court has considered the information before it related to Defendant's Motion For Certificate of Judge Requesting Issuance of Out-of-State Subpoenas Duces Tecum Pursuant to C.R.S. 16-9-203, and FINDS THAT:

1. From information filed by the Defendant, it would appear that the Keeper of Records for the Division of Adult Probation and Parole, State of Utah, has in his possession or control documentary evidence which is materil to a motion to suppress hearing which is set for September 20, 1977, at 9:00 a.m..

2. The Keeper of Records for the Division of Adult Probation and Parole can be found in the Social Services Building, Salt Lake City, Utah, a distance of four hundred fifty (450) miles from Aspen, Colorado.

3. Pursuant to C.R.S. 16-9-203, a person subpoenaed from another state is to be tendered Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the court where the prosecution is pending, and Twenty Dollars (\$20.00) for each day that he or she is required to travel and attend as a witness.

4. On the basis of the mileage involved, one day's travel time and one day's presence in court, it is determined that the Keeper of Records should receive the amount of One Hundred Thirty Dollars (\$130.00) to attend and testify in the above-entitled action.

IT IS ORDERED THAT a certificate for an out-of-state subpoena duces tecum to the Keeper of Records, Division of Adult

Order
Page 2.

Probation and Parole, State of Utah, shall be issued requesting the production of documentary evidence which is set forth in detail in the Certificate. IT IS FURTHER ORDERED that a check in the amount of One Hundred Thirty Dollars (\$130.00) be drawn as witness fees on the account of the State of Colorado, and be made payable to the Keeper of Records, Division of Adult Probation and Parole, State of Utah.

Done this _____ day of September, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

9-13-77
MKB

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

CERTIFICATE OF JUDGE
REQUESTING ISSUANCE OF
OUT-OF-STATE SUBPOENA
DUCES TECUM PURSUANT TO
C.R.S. 16-9-203

THEODORE ROBERT BUNDY,
Defendant.

I, George E. Lohr, Judge of the District Court of Pitkin
County, State of Colorado, do hereby certify:

1. There will be a hearing on Defendant's Motion to Suppress Incorporated, Line-up, and In-Court Identification Testimony of Carol Darroch in the above-entitled action to be held in the Pitkin County Courthouse, 506 Main Street, Aspen, Colorado, at 9:00 a.m., on the 20th, 21st, and 22nd days of September, 1977.

2. The undersigned is informed by the Defendant that documentary evidence in the possession or control of Tony Cox, Director of the Driver's License Division, State of Utah, 314 State Office Building, Salt Lake City, Utah, is necessary and material for the Defense in this matter.

3. Tony Cox is to be in attendance at the above-stated time and place on September 20, 1977, and is to have in his possession the following:

Any and all request forms, order forms, receipts, or other records filled out in connection with the reproduction for law enforcement agencies of an enlarged driver's license photograph of Theodore Robert Bundy (Driver's License No. A957298; Date of Birth - November 24, 1946). This photograph was taken on or about December 16, 1974 in Salt Lake City, Utah. All records of requests made for this photograph of Mr. Bundy between December 16, 1974 and October 2, 1975, are to be produced at the suppression hearing mentioned above.

4. It is understood that Mr. Cox will be tendered the sum of Ten Cents (\$.10) for each mile travelled by the ordinary route to and from the Pitkin County District Court, and Twenty Dollars (\$20.00) for each day he is required to travel and testify as a witness.

5. If Tony Cox comes into this state in obedience to a

summons directing him to attend and testify in the above-entitled action, he shall not, while in this state pursuant to such summons, be subjected to arrest or service of process, civil or criminal, in connection with matters which arose prior to his entrance into this state.

6. Tony Cox will be required to travel from Salt Lake City, Utah, to Aspen, Colorado, a distance of four hundred fifty (450) miles.

7. This certificate has been issued for the purpose of being presented to a Judge of the Third Judicial District Court in and for Salt Lake County, State of Utah, where Tony Cox now is, upon proceedings to compel the production of the above-enumerated documentary evidence in his possession or control at the forthcoming suppression hearing.

Done this _____ day of September, 1977.

BY THE COURT:

George E. Lohr
District Court Judge

9-13-77
MRS

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

vs.

THEODORE ROBERT BUNDY,

Defendant.

O R D E R

The Court has considered the information before it related to Defendant's Motion For Certificate of Judge Requesting Issuance of Out-of-State Subpoenas Duces Tecum Pursuant to C.R.S 16-9-203, and FINDS THAT:

1. From information filed by the Defendant, it would appear that Tony Cox, Director of the Driver's License Division, State of Utah, has in his possession or control documentary evidence which is material to a motion to suppress hearing in the above-entitled action which is set for September 20, 1977, at 9:00 a.m..
2. Tony Cox must travel to Aspen, Colorado, from Salt Lake City, Utah, a distance of four hundred fifty (450) miles.
3. Pursuant to C.R.S. 16-9-203, a person subpoenaed from another state is to be tendered Ten Cents (\$.10) for each mile traveled by the ordinary route to and from the court where the prosecution is pending, and Twenty Dollars (\$20.00) for each day that he or she is required to travel and attend as a witness.

IT IS ORDERED THAT a certificate for an out-of-state subpoena duces tecum to Tony Cox, Director of the Driver's License Division, State of Utah, shall be issued requesting the production of documentary evidence which is set forth in detail in the Certificate. IT IS FURTHER ORDERED that a check in the amount of One Hundred Thirty Dollars (\$130.00) be drawn as witness fees on the account of the State of Colorado, to cover witness fees and expenses for one day's travel, one day's presence in court and mileage. The check is to be made payable to Tony Cox, Director of Driver's License Division, State of Utah.

Order
Page 2.

Done this _____ day of September, 1977,

BY THE COURT:

George E. Lohr
District Court Judge

9-13-77
MKB

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

A F F I D A V I T

vs.

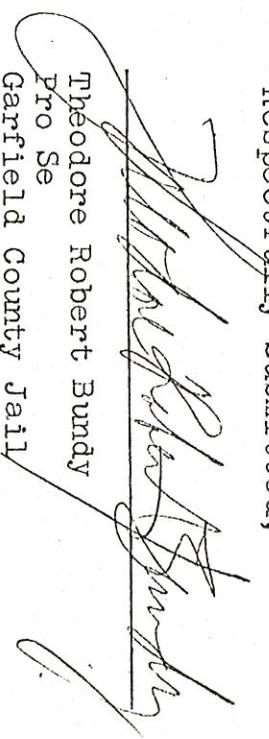
THEODORE ROBERT BUNDY,

Defendant.

Tony Cox is the Director of the Driver's License Division for the State of Utah which is located at 314 State Office Building, Salt Lake City, Utah, a distance of four hundred fifty (450) miles from Aspen, Colorado. His presence will be required on September 20, 1977.

He is to produce documents and records kept by his agency relating to a driver's license photograph ordered by the police sometime during 1975, and subsequently shown to a kidnapping victim, Carol Daronch. It is alleged that upon viewing this photograph of defendant Ms. Daronch stated that this looked "the most like him (her abductor) of any of them". Defendant believes that the showing of this photograph is part of a chain of impermissibly suggestive pretrial confrontations which tainted her subsequent line-up identification. It is essential that the defendant knows when this driver's license photograph was ordered and who ordered it. For this reason, documentary evidence in Mr. Cox's possession or control is relevant and material to a hearing where defendant seeks to demonstrate that Carol Daronch's identification of him was procured in a manner violating due process of law.

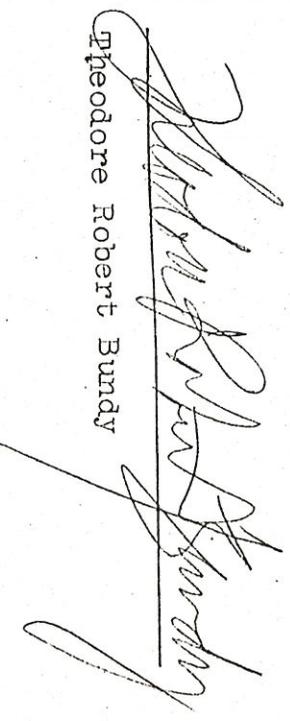
Respectfully Submitted,


Theodore Robert Bundy
Pro Se

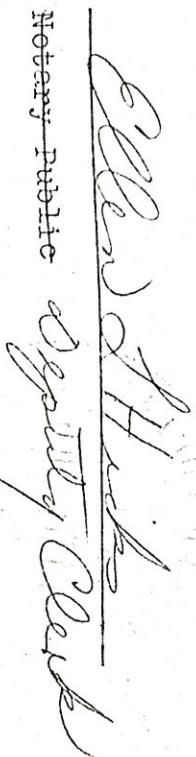
Garfield County Jail
Glenwood Springs, Colorado 81601

)
STATE OF COLORADO)
)) ss.
County of Pitkin)
)

Theodore Robert Bundy, being of lawful age, and being first duly sworn upon oath, deposes and says that he has read the above Affidavit and that he knows the contents thereof, and that the same are true of his own knowledge and belief.


Theodore Robert Bundy

Sworn and subscribed to before me this 12th day of
September, 1977. ~~My~~ Commission expires: _____


Notary Public Deputy Clerk

IN THE DISTRICT COURT
IN AND FOR THE COUNTY OF PITKIN
AND STATE OF COLORADO

Criminal Action No. C-1616

THE PEOPLE OF THE
STATE OF COLORADO,

Plaintiff,

MOTION FOR MODIFICATION OF
ORDER ON THE USE OF RESTRAINTS
IN THE COURTROOM

vs.

THEODORE ROBERT BUNDY,
Defendant.

COMES NOW Theodore Robert Bundy, defendant pro se, and
states and alleges as follows:

1. On June 13, 1977, the Court ordered that the defendant could be kept in leg shackles during courtroom appearances.

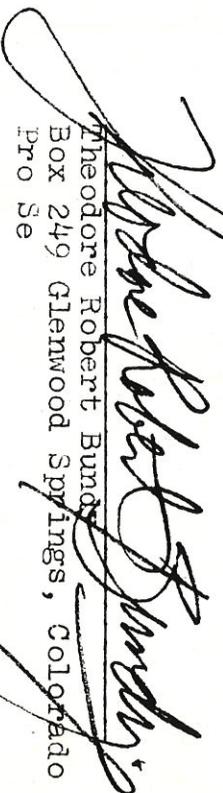
2. In the course of conducting his own defense, defendant will be required to examine numerous witnesses during a suppression of evidence hearing scheduled to begin September 20, 1977. For the defendant to be forced to wear shackles while questioning these witnesses would be humiliating and would otherwise interfere with the examination process.

3. The dignity and decorum of the Court would also suffer from the spectral of a shackled individual attempting to question witnesses during this crucial hearing.

4. The defendant has never threatened nor exhibited assaultive or violent behavior while inside or outside the courtroom. He is not a danger to himself or others while in the courtroom.

WHEREFORE, defendant moves that he not be handcuffed or shackled during the actual suppression hearing scheduled for September 20, 1977, and that if restraints must be used, they be used during court recesses.

Respectfully Submitted,


Theodore Robert Bundy
Box 249 Glenwood Springs, Colorado
Pro Se

Dated this ~~7th~~ day of September, 1977.

Motion Denied
9/17/77
BY THE COURT
C. R. H.
D. H. H.