IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Criminal Case No. 24-cr-00113-NYW

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. JON M. HALLFORD,
2. CARIE L. HALLFORD,

Defendants.

GOVERNMENT'S MOTION REQUESTING TELEPHONIC AUDIO-LINE ACCESS (LISTEN-IN ONLY) FOR VICTIMS IN CONNECTION WITH DEFENDANTS' CHANGE OF PLEA HEARINGS

The United States of America, by and through Matthew Kirsch, Acting United States Attorney for the District of Colorado, by and through Tim Neff, Assistant United States Attorney, hereby files this Motion Requesting Telephonic Audio-Line Access (listen-in only) for Victims in Connection with Defendants' Change of Plea Hearings.

1. The Defendants are presently scheduled for Change of Plea Hearings on October 24, 2024, at 1:00 pm (Carie L. Hallford) and 1:30 pm (Jon M. Hallford).

2. During the Government's communications with various victims in this matter, the Government has learned that traveling to Denver to attend the hearings in-person presents a hardship for certain victims. Multiple victims live in the Colorado Springs area and further south in Southern Colorado which consequently would necessitate a

one to three hour car drive (one-way) to Denver depending on the location of their residence. A number of the victims have voiced interest to the Government that they desire to attend the hearings, but due to the considerable distance they would be required to travel to Denver, attendance is impracticable. Specifically, a number of the victims are elderly, have pressing work or childcare commitments, unreliable transportation, and/or limited financial resources necessary for traveling to Denver.

3. As a result, the Government requests that the Court exercise its discretion and allow for telephonic audio-line access (listen-in only) for such victims during the hearings. Providing the victims such access will allow them the ability to monitor the hearings in a meaningful manner and further the interests of justice. *See*, 18 U.S.C. § 3771(a)(3), (Crime Victim Rights Act) (a crime victim has "the right not to be excluded from any such public court proceeding…").

4. Government counsel has consulted with both defense counsel (Ms. Laura Suelau and Mr. Robert "Chaz" Melihercik) and neither opposes the Government's request. To the extent the Court grants such limited telephonic access, both parties desire the Court to provide the appropriate admonition to any listeners on the audio-line consistent with D.C.COLO.LCrR 57.3 (c) (prohibiting persons from making audio or video recordings in any courtroom).

WHEREFORE, the Government respectfully requests that the Court grant the herein Motion.

Respectfully submitted this 23rd day of October, 2024.

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