

SECOND JUDICIAL DISTRICT COURT  
COUNTY OF BERNALILLO  
STATE OF NEW MEXICO

STATE OF NEW MEXICO,

Plaintiff,

v.

No. D-202-CR-2020-01887

JONATHAN JOB MARTINEZ,

Defendant.

**STATE'S NOTICE OF GIGLIO DISCLOSURE**

The State of New Mexico, by and through Assistant District Attorney Guinevere Ice, hereby gives notice to the Court and the Defendant that it has found that potential impeachment information exists for Lab Technician Wayne DeChano with the Albuquerque Police Department and that the State has disclosed the information to the defense as required by *Giglio v. United States*, 405 U.S. 150 (1972), Rule 5-501(A)(6) NMRA, Rule 5-505 NMRA, and LR2-308(C) NMRA. The State's disclosure obligations are not limited by the evidence that would be admissible at trial. Rule 5-503(C) NMRA. By making this disclosure, the State takes no position on the admissibility of such information as evidence or the use of such information in cross-examination and reserves the right to object to the introduction at trial of any evidence that should be excluded under the Rules of Evidence.

Respectfully submitted,

RAÚL TORREZ  
DISTRICT ATTORNEY

/s/ Guinevere Ice  
Guinevere Ice  
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Certificate of Service

I certify that this notice has been filed through E-File & Serve with notice automatically provided to all parties.

/s/ Guinevere Ice  
Assistant District Attorney