

SECOND JUDICIAL DISTRICT COURT  
COUNTY OF BERNALILLO  
STATE OF NEW MEXICO

STATE OF NEW MEXICO,

Plaintiff,

v.

No. D-202-CR-2020-2144

CYNTHIA PERKINS,

Defendant.

**STATE'S NOTICE OF GIGLIO DISCLOSURE**

The State of New Mexico, by and through Assistant District Attorney Ashlee Mills, hereby gives notice to the Court and the Defendant that it has found that potential impeachment information exists for Officers Donald Correria and Fouad Cherair with 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/ Ashlee Mills  
Ashlee Mills  
Assistant District Attorney

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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/ Ashlee Mills  
Assistant District Attorney