

**STATE OF NEW MEXICO
COUNTY OF SANTA FE
FIRST JUDICIAL DISTRICT COURT**

STATE OF NEW MEXICO,

Plaintiff,

vs.

HANNAH GUTIERREZ,

Defendant.

**No. D-101-CR-202300040
Judge Mary Marlowe Sommer**

CRIMES: Involuntary Manslaughter; Tampering with Evidence

THIRD AMENDED CRIMINAL INFORMATION

Special Prosecutors Kari T. Morrissey and Jason J. Lewis on behalf of the State of New Mexico, state that on or about the dates listed below, in said County and State, the above-named Defendant did commit the crimes of:

Count 1: Involuntary Manslaughter, (007), on or about October 21, 2021, in Santa Fe County, New Mexico at the Bonanza Creek Ranch located at 545 Bonanza Creek Road, Santa Fe, New Mexico 87508 the above-named defendant did cause the death of Halyna Hutchins, committed in the commission of an unlawful act, to wit: Negligent Use of a Deadly Weapon, contrary to 30-7-4 (a)(3), a fourth degree felony, contrary to NMSA 1978, Section 30-2-3(B)(1994).

IN THE ALTERNATIVE

Count 1: Involuntary Manslaughter, (006), on or about October 21, 2021, in Santa Fe County, New Mexico, at the Bonanza Creek Ranch located at 545 Bonanza Creek Road, Santa Fe, New Mexico 87508 the above-named Defendant did cause the death of Halyna Hutchins, committed in the commission of a lawful act, which might produce death in an

unlawful manner or without due caution and circumspection, a fourth degree felony, contrary to NMSA 1978, Section 30-2-3(B) (1994).

Count 2: Tampering with Evidence, (4230) on or about October 21, 2021, in Santa Fe County, New Mexico the above-named defendant did transfer narcotics to another person with the intent to prevent the apprehension, prosecution or conviction of herself, and the highest crime was a fourth degree felony, contrary to NMSA 1978, Section 30-22-5 (2003).

Respectfully submitted,

/s/ Kari T. Morrissey
Kari T. Morrissey
Jason J. Lewis
Special Prosecutors
1303 Rio Grande Blvd. NW, Ste. 5
Albuquerque, NM 87104
T: 505-361-2138

Defense Attorney: Jason Bowles
Name: Hannah Gutierrez
Address: c/o Jason Bowles, 4811 Hardware Drive NE, Suite D-5, Albuquerque, New Mexico 87109
YOB: XX/XX/1997
POB:
Last 4 SSN: XXX-XX-0478
Height: 5'4"
Weight: 115 lbs.
Color of Eyes: Brown
Color of Hair: Blue
FBI No.:
Marks/Tattoos:
Aliases: Hannah Gutierrez-Reed; Hanna Gutierrez Reed
Booking Slip No:
State Tracking No.: Not Available
Magistrate Court No: