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2017 DEC 19 AM 11:38

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF COCONINO

STATE OF ARIZONA,

Plaintiff,

Case No. CR 2017-00838

vs.

MOTION TO AMEND ELECTRONIC
MONITORING ORDER

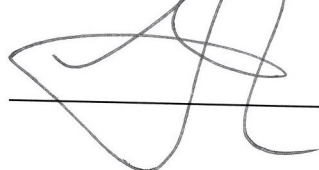
KAYSON JEFFREY RUSSELL,
Defendant.

Hon. Mark Moran

The Defendant, KAYSON JEFFREY RUSSELL, by and through the undersigned attorney, Joseph Carver, moves this Court to allow Pre-Trial Services to remove electronic monitoring as long as Mr. Russell resides within the Flagstaff city limits. At the last hearing, the Court added electronic monitoring as a condition of release after Pre-Trial Services notified the Court that Kayson was residing in Leupp, AZ. Due to the cost of monitoring, however, Kayson would like to move into Flagstaff and stay with his mother. Since Kayson's residence in Leupp was the impetus for electronic monitoring, the Defense asks this Court to allow Kayson to remove electronic monitoring once Pre-Trial Services verifies his residence within the Flagstaff city limits.

RESPECTFULLY SUBMITTED, this 19 day of December, 2017.

GARY PEARLMUTTER
COCONINO COUNTY LEGAL DEFENDER



Joseph A. Carver
Deputy Legal Defender

Copy of the foregoing Motion mailed/delivered
this 19 day of December, 2017 to:

Hon. Mark Moran
Judge of Superior Court

Ammon Barker
Deputy County Attorney

By Julie Hall