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FILED

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.

RESPONSE TO NON-COMPLIANCE
REPORT AND ORDER

KAYSON JEFFREY RUSSELL,

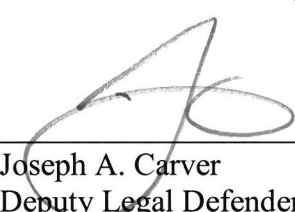
Defendant.

Hon. Mark Moran

The Defendant, KAYSON JEFFREY RUSSELL, by and through the undersigned attorney, Joseph Carver, responds to the Non-Compliance Report filed on March 15, 2018. The report lists two alleged violations of failing to report in person to Pre-Trial Services. The Defense acknowledges that regular reporting is an important component of supervised release. According to the report, however, it appears that Pre-Trial Services was able to locate Kayson where he was supposed to be. The report does not mention any missed, diluted or dirty UAs. Kayson has been in school for more than one month and the report does not indicate that he is skipping classes or otherwise not located where he is supposed to be. The Defense therefore requests that the Court take no action on the present report, or alternatively set a hearing where the allegations can be addressed.

RESPECTFULLY SUBMITTED, this 19 day of March, 2018.

GARY PEARLMUTTER
COCONINO COUNTY LEGAL DEFENDER



Joseph A. Carver
Deputy Legal Defender

Copy of the foregoing Motion mailed/delivered
this 19 day of March, 2018 to:

Hon. Mark Moran
Judge of Superior Court

Ammon Barker
Deputy County Attorney

By

Michelle Hill