

THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS.

SUPERIOR COURT

STATE OF NEW HAMPSHIRE

v.

JOHN MADORE

219-2016-CR-015

**STATE'S ASSENTED TO MOTION TO MODIFY BAIL**

NOW COMES the State of New Hampshire by and through the office of the Strafford County Attorney, Thomas P. Velardi, and respectfully requests this Honorable Court modify bail in this matter and states the following in support thereof:

1. The defendant stands charged by complaints out of the Strafford County Superior Court with Reckless Conduct, Second Degree Assault, and Simple Assault for conduct occurring on January 6, 2016.
2. The defendant was initially released on a cash to convert bail order. A warrant was issued on March 3, 2016 as a result of the defendant's failure to adhere to his bail conditions.
3. A further bail hearing was held on May 24, 2016. At that time, bail in this matter was amended to \$5,000 cash only, to convert to P.R. upon transfer to the New Hampshire State Hospital for an IEA admission. A provision was included that immediately reverted Mr. Madore's bail back to cash upon his discharge from New Hampshire State Hospital.
4. On September 8, 2016, undersigned counsel for the State spoke with Attorney Lynne Mitchell of the New Hampshire State Hospital. Attorney Mitchell informed undersigned counsel that Mr. Madore was ready to be released into New Hampshire Hospital's supervised transitional housing program.
5. As a result of this conversation, the State is requesting the Mr. Madore's bail be amended to \$5,000 P.R. contingent upon his following the requirements of his conditional release from New Hampshire State Hospital. The State requests that all other conditions of the May 24, 2016 bail order remain in effect.
6. The State has consulted with the defendant's attorney in this matter, Evan Nappen, Esq., and he assents to this Motion.

*Upon review, motion granted.  
Bail modified consistent  
with paragraph 5, of the  
motion.*

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*Mark E. Howard  
P.J.*

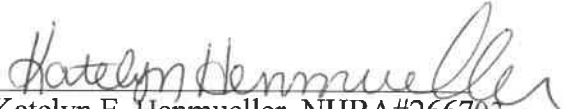
Mark E. Howard *36*  
Presiding Justice

WHEREFORE, the State respectfully requests this Honorable Court:

- A. Grant this Assented to Motion to Modify Bail; and
- B. Grant such further relief as the Court deems just and proper.

Dated: September 15, 2016


Respectfully submitted,  
**THE STATE OF NEW HAMPSHIRE**

  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing State's Assented to Motion to Modify Bail has been forwarded to defense counsel, Evan Nappen, Esq.

Dated: September 15, 2016

  
Katelyn E. Henmueller