

THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS.

SUPERIOR COURT
219-2016-CR-00015

STATE OF NEW HAMPSHIRE

v.

JOHN MADORE

STATE'S RESPONSE TO MOTION TO REINSTATE BAIL CONDITIONS

NOW COMES the State of New Hampshire, by and through the Office of the Strafford County Attorney, and respectfully moves this Honorable Court to deny the defendant's motion to reinstate bail in the above-captioned matter, and says in support thereof:

1. The defendant is charged with Reckless Conduct, Second Degree Assault, and Simple Assault for conduct occurring on January 6, 2016 in Strafford, New Hampshire.
2. On January 11, 2016, the defendant's bail was set at \$5,000 cash only to convert to personal recognizance upon acceptance by Strafford County Community Corrections ("Community Corrections") following a mental health referral, among other standard bail conditions.
3. On March 2, 2016, the State requested a warrant for violating conditions of the defendant's bail supervision, which stated the defendant was released from the New Hampshire State Hospital and no longer living at this approved residence his whereabouts were unknown.
4. The Court issued a warrant on March 3, 2016. The defendant was ordered to be held without bail or bond. Bail would be set upon apprehension.
5. Upon information and belief, the State asserts the defendant has been in Connecticut and/or New Jersey and may no longer be in a treatment facility. Neither the State nor Community Corrections have been provided documentation of his treatment or informed about whether he has returned to New Hampshire.
6. The State contacted Community Corrections about continued supervision of the defendant. Upon information and belief, Community Corrections has had no contact with the defendant and would have to reassess the defendant for supervision upon verification of past and current treatment.
7. Accordingly, the State requests the Court deny the defendant's motion to reinstate bail and set bail upon apprehension.

WHEREFORE, the State respectfully requests that this Honorable Court:

- A. Deny the defendant's Motion to Reinstate Bail Condition; and
- B. Set bail upon apprehension of the defendant; and
- C. Grant such further and other relief as justice may demand.

Respectfully submitted,
THE STATE OF NEW HAMPSHIRE

03/31/2016



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CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing State's Pleading has on this date been forwarded to Attorney Evan F. Nappen, counsel for the defendant, at 280 Pleasant Street, Concord, NH 03301.



Meghan C. Hagaman
Assistant County Attorney