

THE STATE OF NEW HAMPSHIRE

STRAFFORD, SS.

SUPERIOR COURT
219-2016-CR-00015

STATE OF NEW HAMPSHIRE

v.

JOHN MADORE

STATE'S ASSENTED TO MOTION TO AMEND BAIL

NOW COMES the State of New Hampshire, by and through the Office of the Strafford County Attorney, and respectfully moves this Honorable Court to grant the State's motion to revoke 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 January 19, 2016, the defendant filed an assented to motion to amend bail. In pertinent part, the motion requested to strike the no contact provision with his mother Theresa Madore and his sister Jacinta Madore. The Court granted the assented to motion.
4. On March 3, 2016, the Court issued a warrant for violating conditions of the defendant's bail supervision. On May 19, 2016, Strafford Police Department arrested the defendant on the warrant. The State filed a Motion to Revoke Bail prior to the bail hearing.
5. On May 24, 2016, the Court held a bail hearing. The State asserts the no contact provision was inadvertently requested or ordered as a condition of bail. Upon information and belief, the victims want the bail provision removed to allow contact. The States requests the Court amend the bail order to strike the no contact provision involving Theresa Madore and Jacinta Madore.
6. Accordingly, the State requests this Honorable Court grant the State's Motion to Amend the Bail Order.
7. The State contacted Attorney Evan Nappen, counsel for the defendant, who assents to this motion.

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A. COTE 6-14-16

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Steven M. Houran
Presiding Justice

Granted;
FO ordered,
6/14/16

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WHEREFORE, the State respectfully requests that this Honorable Court:

- A. Grant the State's Assented to Motion to Amend Bail;
- B. Strike the no contact provision; and
- C. Grant such further and other relief as justice may demand.

Respectfully submitted,
THE STATE OF NEW HAMPSHIRE

05/24/2016



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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