

STATE OF NEW HAMPSHIRE

STRAFFORD, SS.

SUPERIOR COURT

STATE OF NEW HAMPSHIRE

v.

JOHN MADORE

219-2016-CR-15

MOTION TO REINSTATE BAIL CONDITIONS

Now comes the defendant, John Madore, by and through Counsel, Evan F Nappen, Esq. and respectfully requests that this Honorable Court reinstate bail conditions in this matter.

1. Mr. Madore was charged in this matter on January 8, 2016.
2. As per his bail conditions set on January 11, 2016, he began the process of engaging with Strafford County Community Corrections.
3. On January 27th, 2016 he met with Amanda Vachon, his Case Manager at that agency.
4. On or about January 31, 2016, prior to the date when he was due to meet again with Ms. Vachon, he was transported to Wentworth Douglas Hospital in Dover, NH, and then to New Hampshire State Hospital in Concord, NH, for evaluation of his mental health. (See attached Certification of Theresa A. Fortin Madore.)
5. Mr. Madore missed his subsequent appointment with Ms. Vachon at Strafford County Community Corrections. A warrant has been issued for his arrest.
6. Prior Counsel for the Defendant, Cynthia Robinson, Esq., of the Strafford County Public Defender's Office has filed a Motion to request a Competency Evaluation in this matter.
7. That request was granted by the Court and that hearing is to be held on April 12, 2016 at 9:00am. The Defendant has been notified and informed that he must attend this hearing.

Wherefore, John Madore, by and through counsel, Evan F. Nappen, respectfully request that this Honorable Court:


- A. Reinstate bail conditions; and
- B. Grant any other relief deemed in the interests of justice.

Upon review, motion DENIED

Mark E. Howard
Mark E. Howard
Presiding Justice

4/4/16

Respectfully submitted,



Evan F. Nappen, Esq.
NH Bar #17470
E.F. Nappen Attorney at Law
280 Pleasant Street
Concord, NH 03301
(603) 223-0001

March 22, 2016

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was sent via US Mail, on March 22, 2016, to the Office of the
Strafford County Attorney.



Evan F. Nappen, Esq.

March 22, 2016

Certification of Theresa A. Fortin Madore

I, Theresa A. Fortin Madore, certify that my son, John Madore, was transported from my residence, to Wentworth Douglas Hospital, in Dover, New Hampshire on January 31, 2016. He was transferred to New Hampshire Hospital, in Concord, New Hampshire, on February 5th, 2016 and was discharged on February 18th.

Theresa A. Fortin Madore 3-11-16

Theresa A. Fortin Madore

State of New Hampshire, County of Merrimack

This instrument was acknowledged before me on March 11, 2016 by Theresa A. Fortin Madore.

My Commission Expires:

Katy A. Brown Solsky 3-11-16
Signature of Notarial Officer / Title

KATY A. BROWN SOLSKY, Notary Public
My Commission Expires November 12, 2019

Affix Seal, if any:

