

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

THE STATE OF OREGON,)	
)	
Plaintiff,)	
vs.)	Case No. 21CR00416
)	
CHANDLER PAPPAS,)	
)	
Defendant.)	

MOTION TO MODIFY TERMS OF RELEASE AGREEMENT

Comes now the Defendant by and through his attorney, David B. Kuhns and moves the Court for a modification of the terms of his pre-trial release agreement;

Defendant was released following the posting of security on January 22, 2021. Following a hearing, the Court modified the terms and conditions of Defendant's release on January 26, 2021. One of the terms of that release agreement prohibited Defendant from departing the State unless authorized by the Court. At the January 21, 2021 hearing, Defendant advised the Court that he was considering a move to Arizona.

Defendant has fully complied with all terms of his release to date. He has also confirmed that he has a residence and employment available to him in Arizona. Defendant moves that his release be modified to allow him to reside in Arizona while this case is pending. All other conditions of release, including compliance with the directives of Supervised Pre-trial Release, shall remain as previously ordered until further order of the Court.

Keir Boettcher, attorney for Plaintiff, has indicated that he does not oppose this motion.

DATED This 4th day of February, 2021.

A handwritten signature in black ink, appearing to read "David B. Kuhns", written over a horizontal line.

David B. Kuhns, OSB 862264