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SUE HALL, CLERK
APACHE COUNTY SUPERIOR COURT

5 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
6 IN AND FOR THE COUNTY OF APACHE
JUVENILE DIVISION

| | |
|-----------------------------|---------------------------|
| 7 IN THE MATTER OF: | |
| 8 CHRISTIAN RYAN ROMERO, | NO. JV2008-065 |
| 9 A person under the age of | REQUEST TO TERMINATE |
| 10 eighteen (18) years. | FURLOUGH |
| | (ORAL ARGUMENT REQUESTED) |

11 THE STATE, through counsel undersigned, hereby respectfully
12 requests this Court terminate the juvenile's furlough. Last
13 week the juvenile ran into the dugout at a little league
14 baseball game and tried to watch the game from the dugout.
15 This caused an extreme negative reaction from the parents and
16 especially the other juveniles.

17 Recently, the juvenile's biological mother took him out of
18 state without permission. It is unknown where the juvenile
19 and his mother stayed within the state of New Mexico. Still,
20 it resulted in the juvenile missing his Court ordered
21 schooling and violating his furlough conditions.

22 Even more disturbing, is the fact that the juvenile's mother
23 is again living with a convicted felon. This is the same
24 convicted felon she was residing with some months ago when the
25 probation department and this Court ordered that such
26 association stop. She takes the juvenile with her to this
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1 felon's residence and allows the juvenile to spend the night
2 at his residence.

3 Finally, the juvenile's parental grandmother has inquired of
4 the St. Johns Police Department as to "how much trouble will I
5 get in if I buy a gun". The State is unsure if the paternal
6 grandmother is buying the gun to protect the juvenile from the
7 many threats he has received or to protect herself.

8 These examples cited above make it obvious no conditions
9 imposed upon this juvenile, through his mother or grandmother,
10 can guarantee his safety or more importantly the safety of the
11 community. The State respectfully urges this Court to
12 terminate the juvenile's furlough, and return him back to the
13 custody of the juvenile detention center where he can be
14 supervised and educated. This request is made in the
15 interests of justice, the continued safety of the juvenile and
16 the safety of this community and the public at large.

17 RESPECTFULLY SUBMITTED this 5th day of June, 2009.

18 MICHAEL B. WHITING
19 Apache County Attorney

20 A copy of the foregoing
21 mailed/delivered/faxed this
22 5th day of June, 2009. to:

23 Apache County Superior Court
24 St. Johns, AZ

25 The Wood Law Office
26 Court House Box

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