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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF YAVAPAI**

STATE OF ARIZONA,

Plaintiff,

vs.

ANTHONY RICHARDS,

Defendant

**P1300CR201600476**

**MOTION TO MODIFY RELEASE  
CONDITIONS and ORDER**

(Oral Argument Requested)  
**(Hon. Tina Ainley)**

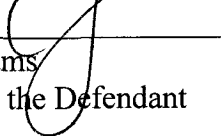
The Defendant, by and through Counsel undersigned, moves the Court to Hear and Decide this Motion concerning Release conditions. Circumstances beyond the Defendant's control have delayed his trial. First, there was a mistrial. Next, the legitimate concerns surrounding the coronavirus pandemic (COVID-19), will make preparations for the next trial very difficult. Counsel undersigned must travel to California to conduct at least one deposition before the trial. Travel arrangements and getting a court reporter in California will be very hard for the foreseeable future. The Defense has requested depositions on Paul Chastain, Joan Shattuck, and Craig Comstock. These depositions are vital for a fair trial. Normally, scheduling and conducting depositions are not this difficult. But these are not normal times.

None of these delays are the Defendant's fault.

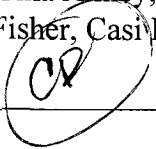
Thus, in fairness, the Defendant requests that a reasonable secured bond be set. The

Defendant has a local address where he can go stay: Walt and Carol Curl at 3446 E. Mockingbird Ln., Camp Verde, AZ 86322. This would also allow the Defendant to better participate in his defense.

RESPECTFULLY SUBMITTED this March 18, 2020.

By  \_\_\_\_\_  
Craig Williams  
Attorney for the Defendant

Copies of the foregoing delivered this date to  
Hon. Tina Ainley, Judge of the Superior Court  
Josh Fisher, Cassi Harris, Yavapai County Attorney's Office

By  \_\_\_\_\_