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8 Attorney for Defendant Michael Lee Ham

SUPERIOR COURT
YAVAPAI COUNTY, ARIZONA

2020 JAN -7 AM 10: 28

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BY: T. STRIEDIECK ✓

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

8 **STATE OF ARIZONA.,**

9 **Plaintiff,**

10 **vs.**

11 **MICHAEL LEE HAM,**

12 **Defendant.**

Case No.: P1300CR201901558

**UNOPPOSED
MOTION TO MODIFY RELEASE
CONDITIONS**

(EXPEDITED)

13
14
15 COMES NOW Defendant Doctor Michael Lee Ham, by and through counsel
16 undersigned, pursuant to Arizona Rule of Criminal Procedure 7.4(C), who respectfully requests
17 the Court to modify his release conditions with respect to returning to work.

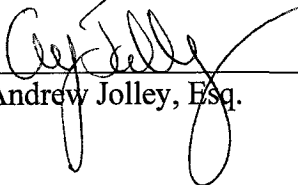
18 As a standard release condition, the Court ordered Dr. Ham to refrain from returning
19 to the scene of the crime. However, this matter involves Dr. Ham's business, and thus restraining
20 him from going to work is unreasonable at this time.

21 Undersigned counsel spoke with Cynthia Giltner, Assistant Attorney General, on
22 January 6th, 2020, regarding this Motion. Ms. Giltner indicated that the State does not oppose
23 modifying the release conditions to allow Dr. Ham to return to work at any of his offices located
24 within the State of Arizona. Attached as Exhibit A is the Email confirming such.
25

1 Accordingly, counsel undersigned requests that this Court modify the current release
2 conditions and remove the restriction preventing Dr. Ham from returning to work.

3 RESPECTFULLY SUBMITTED this 7 Day of January, 2020.

4 Prescott Law Group, PLC

5 
6 _____
7 J. Andrew Jolley, Esq.

8 Original of the foregoing filed on this 7th day of January, 2020, with:

9 **Clerk of the Superior Court**
10 120 S. Cortez Street
11 Prescott, Arizona 85301

12 Copies of the foregoing hand-delivered:
13 Judge Ainley

14 Copy emailed to:
15 Cynthia Giltner
16 Assistant Attorney General
17 Cynthia.Giltner@azag.gov

18 By:  _____

EXHIBIT "A"

EXHIBIT "A"

1/7/2020

Prescott Law Group Mail - Dr. Ham



Andy Jolley <andy@plgnaz.com>

Dr. Ham

Giltner, Cynthia <Cynthia.Giltner@azag.gov>
To: Andy Jolley <andy@plgnaz.com>

Tue, Jan 7, 2020 at 9:17 AM

Andy,

We do not oppose a modification to allow him to return to work at his offices.

Cynthia Giltner

Assistant Attorney General

Northern Arizona office: (928) 778-1276

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