

IN THE IOWA DISTRICT COURT IN AND FOR BUCHANAN COUNTY

STATE OF IOWA, Plaintiff, vs. CHRISTOPHER DOUGLAS SOULES, Defendant.	CASE NO. FECR081656 MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE TO PERMIT TRAVEL (Unopposed)
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COMES NOW Mr. Soules, by and through his undersigned attorneys, and for his Application to Modify Conditions of Pretrial Release to Permit Travel respectfully states to the Court as follows:

1. Mr. Soules is currently on Pretrial Release, with a cash-only bond of \$10,000.00.
2. As a condition of Pretrial Release, Mr. Soules is prohibited from leaving the State of Iowa without written consent from the Court.
3. Mr. Soules seeks the Court's permission to travel out of state for business. Pursuant to the discussion occurring with the Court in Court on February 5, 2018, Mr. Soules provided the State and his pretrial release officer with information relating to the trip. The undersigned provided information relating to the travel on April 11, 2018 and, for references purposes, the order permitting travel will relate to the contents of communication on the aforementioned date.
4. Mr. Soules has maintained regular contact with a supervising probation officer. The Court has previously approved Mr. Soules traveling out-of-state which has occurred without incident.
5. The County Attorney has no objection to this request.

6. Prohibiting this limited travel would not significantly further the requirement for Mr. Soules to appear for court proceedings, nor the protection of the public.

WHEREFORE, Mr. Soules prays this court issue an Order authorizing him to travel outside the State of Iowa consistent with the information supplied to the State and the Department of Correctional Services.

**PARRISH KRUIDENIER DUNN BOLES GRIBBLE
GENTRY BROWN & BERGMANN, L.L.P.**

By: /s/ Brandon Brown

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ATTORNEYS FOR DEFENDANT

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause by:

- | | |
|---|---|
| <input type="checkbox"/> personal service | <input type="checkbox"/> first class mail |
| <input type="checkbox"/> certified mail, return receipt requested | <input type="checkbox"/> facsimile |
| <input type="checkbox"/> Airborne Express (overnight) | <input checked="" type="checkbox"/> electronic filing |
| | <input type="checkbox"/> e-mail |

on April 12, 2018.

I declare that the statements above are true to the best of my information, knowledge and belief.

/s/ Anita Soderblom

Copies to:

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ATTORNEYS FOR PLAINTIFF

Christopher D. Soules
CLIENT