

STATE OF ALABAMA,)	
)	IN THE DISTRICT COURT OF
Plaintiff)	
)	MARION COUNTY, ALABAMA
vs.)	
)	CASE NO.: DC-2024-900460.00
JOHN TRACY ESTES,)	
)	
Defendant.)	

MOTION TO MODIFY CONDITIONS OF BOND

COMES NOW the Defendant, in the above styled cause, by and through his undersigned counsel, pursuant to Rule 7.4 (b) of the Alabama Rules of Criminal Procedure, and for good cause shown, requests this Honorable Court to modify the previous conditions of bond wherein the Court placed certain conditions on the Defendant’s release that may involve travel out of the State of Alabama and to the extent thereof and for good cause shown the Defendant would state as follows:

1. Defendant, as a requirement of his employment, is required to travel and sometimes his travel involves leaving the State of Alabama.
2. On September 25, 2024, the Defendant, by and through his counsel of record, entered a plea of not guilty to the charge as alleged in the complaint.
3. Since posting bail and being released on bond, there have been no reported incidents nor any violations of the conditions of the Defendant’s bond.
4. Defendant requests that the Court remove any prohibition as a condition of his bond or any other order of this Court that restricts him leaving the State of Alabama for the purposes of his employment or other personal travel.
5. Defendant avers there are no issues which present any danger for the Defendant leaving the State of Alabama. The Defendant is not a flight risk and therefore respectfully asks this

Honorable Court to remove such restrictions, if any, as a condition of his bond or any other court order.

WHEREFORE PREMISES CONSIDERED, the Defendant respectfully requests this Honorable Court set this matter for hearing at the Court's earliest convenience and after conducting such hearing grant the Defendant's motion and the relief sought herein.

ORAL ARGUMENT REQUESTED

Respectfully Submitted,

s/Jonathan B. Lowe (LOW022)

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CERTIFICATE OF SERVICE

I hereby certify I have electronically served a copy of the above and foregoing **Motion to Remove Conditions of Bond** on the following counsel of record on this the 25th day of September 2024.

Honorable Scott Slatton
District Attorney
P.O. Box 1596
Hamilton, Alabama 35570

/s/ Jonathan B. Lowe (LOW022)