

PULL

IN THE COURT OF COMMON PLEAS
PORTAGE COUNTY, OHIO

FILED
COURT OF COMMON PLEAS
FEB 05 2019
JILL FANKHAUSER, Clerk
PORTAGE COUNTY, OH

STATE OF OHIO)
)
 Plaintiff,)
)
 v.)
)
 CONNOR A. HENDRY)
)
 Defendant.)
)
)

CASE NO. 2019 CR 00086

JUDGE LAURIE J. PITTMAN

**MOTION TO MODIFY CONDITIONS
OF BOND**

Defendant Connor A. Hendry respectfully requests that this Honorable Court modify the conditions of his bond in the above-captioned matter. Specifically, Mr. Hendry requests that he be allowed to attend mandatory drill dates for Ohio Army National Guard, attend weekly Sunday mass at St. Patrick Catholic Church, and travel to meet with his attorneys as necessary.

On February 4, 2019, Mr. Hendry was arraigned and entered a plea of "Not Guilty" to one (1) count of Rape, in violation of R.C. § 2907.02, a Felony of the first degree; one (1) count of Sexual Battery, in violation of R.C. § 2907.03, a Felony of the third degree; one (1) count of Abduction, in violation of R.C. § 2905.02, a Felony of the third degree; one (1) count of Gross Sexual Imposition, in violation of R.C. § 2907.05, a Felony of the fourth degree; one (1) count of Sexual Imposition, in violation of R.C. § 2907.06, a Misdemeanor of the third degree; one (1) count of solicitation, in violation of R.C. 2907.24, a Misdemeanor of the third degree; one (1) count of Unauthorized Use of Property, in violation of R.C. § 2913.04, a Felony of the fifth degree.

Also on February 4, 2019, Mr. Hendry was released on a \$35,000 cash or surety bond. Conditions of bond confined Mr. Hendry to house arrest except for travel to and from his place of employment.

At this time, Mr. Hendry respectfully requests the following modifications to his bond:

A. Ohio Army National Guard

Mr. Hendry serves in the Ohio Army National Guard and, as such, is required to attend mandatory drill exercises. The schedule and locations for these drill exercises is attached hereto as "Exhibit A." The time of day that these drills begin and end varies and may change depending on the nature of the drill exercises being conducted.

B. Weekly Church Service

Mr. Hendry is a practicing Catholic and a member of the St. Patrick Catholic Parish. He attends weekly mass on Sundays at 11:00 a.m. at St. Patrick Catholic Church located at 313 N. Depeyster St., Kent, OH 44240.

C. Attorney Meetings

Mr. Hendry has retained undersigned counsel to represent him in this matter. Counsel's office is located at 1375 E. 9th Street, 29th Floor, Cleveland, OH 44114. He respectfully requests that he be permitted to travel to and from his counsel's office for meetings as necessary for his defense. At the present time, Mr. Hendry is scheduled to meet with counsel on Friday, February 8, 2018 at 2:00 p.m.

WHEREFORE, Defendant Connor A. Hendry respectfully requests that this Honorable Court modify the conditions of his bond for the limited purposes of: (1) allowing him to travel to and from, and participate in, mandatory drill exercises in accordance with his obligations to the Ohio Army National Guard; (2) attending weekly mass at St. Patrick Catholic Church; and (3) meetings with counsel as necessary for his defense in this matter.

This request is not being made for any illicit purpose and will not result in an undue burden to the State or the alleged victim in this matter.

Respectfully submitted,

Susan Stone

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CERTIFICATE OF SERVICE

I hereby certify that a copy of Motion to Modify Conditions of Bond was sent this 5th day of February 2019 to Connie Lewandowski, Assistant Portage County Prosecutor, via email at prosecutor@portageco.com.

Susan Stone

SUSAN C. STONE (0064445)



OHIO ARMY NATIONAL GUARD
 COMPANY B, 1ST BATTALION, 148TH INFANTRY REGIMENT
 1241 WEST NEWTON ROAD
 BOWLING GREEN, OH 43402-2821

NGOH-BCT-IB

02 May 2018

MEMORANDUM FOR EMPLOYERS**SUBJECT: Employer Notification (TY-19)**

1. This memorandum is to inform the employers of Soldiers assigned to Bravo Company 1-148th IN RGT, Ohio Army National Guard (OHARNG) of our drill weekends and annual training periods for the upcoming training year.

MONTH	DRILL DATES	Location
OCT 18	18-20 (6)	FT. CUSTER
NOV 18	02-04 (6)	HOME STATION / WALBRIDGE
DEC 18	01 (2)	HOME STATION
JAN 19	19-20 (4)	HOME STATION
FEB 19	09-10 (4)	HOME STATION
MAR 19	09-10 (4)	HOME STATION
APR 19	12-14 (6)	CAMP ATTERBURY
MAY 19	31 (2)	CAMP GRAYLING
JUN 19	01-02 (4)	CAMP GRAYLING
JUL 19	13-27 ANNUAL TRAINING	CAMP GRAYLING
AUG 19	10-11 (4)	HOME STATION
SEP 19	07-08 (4)	HOME STATION

2. We understand that your employee is an important member of your organization. Your continued support of the Ohio Army National Guard is greatly appreciated.
3. The point of contact for this memorandum is SFC Matthew Hiltner at 614-336-6828.

Digitally signed by
 HILTNER, MATTHEW, DAVID, 108
 DN: cn=HILTNER, o=OHARNG
 Date: 2018.05.02 11:29:54 -0400

MATTHEW D HILTNER
 SFC, USA
 RNCO





KOHRMAN | JACKSON KRANTZ

1375 East Ninth Street | One Cleveland Center, 29th Floor | Cleveland, Ohio 44114
Main: 216.696.8700 | Toll-free: 888.696.8700 | Fax: 216.621.6536

TO: Portage County Clerk of Courts
Attn: Common Pleas - Criminal

FROM: Susan C. Stone
(0064445)

FAX #: (330) 297-4554

PAGES: 5

PHONE:

DATE: February 5, 2019

RE: State of Ohio v. Connor A. Hendry, Case No. 2019 CR 00086
Judge Laurie J. Pittman

Motion to Modify Conditions of Bond

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