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6 Attorney for Elizabeth Desiree Archibeque

7  
8 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

9 **IN AND FOR THE COUNTY OF COCONINO**

10 STATE OF ARIZONA,

11 Plaintiff,

12 v.

13 ELIZABETH DESIREE ARCHIBEQUE,

14 Defendant.

Cause Number: CR2020-00633

**REPLY TO STATE'S RESPONSE TO  
MOTION TO MODIFY RELEASE  
CONDITIONS**

Honorable Ted Reed  
(Division 1)

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17 Ms. Archibeque herein replies to the State's response to her request for a reduction  
18 in her bond amount. In its response brief, the State never addressed Ms. Archibeque's sole  
19 request to have her bond reduced to \$49,000 so that she could attain trustee status at the  
20 jail.

21  
22 Throughout her entire motion, Ms. Archibeque never asked this court to release her  
23 to the streets. In fact, Ms. Archibeque specifically states, "Ms. Archibeque realizes no one  
24 in her family is able to post a \$49,000 bond, it is solely her desire to have an opportunity  
25 to work within the jail which warrants this motion." Despite this clear statement, the State  
26 failed to address that request. Instead, the State argues that protection of the community  
27  
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1 and assurance of future court appearances require a denial of her motion. This court can  
2 grant Ms. Archibeque's motion and still be assured the community is safe and she will  
3 make all court appearances because she will still be incarcerated.  
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5 Due to the State's failure to address the sole request for a reduction in the bond to  
6 \$49,000, it is Ms. Archibeque's position that this court should treat the response as not  
7 opposing her request and grant it.

8 RESPECTFULLY SUBMITTED this \_\_22nd\_\_ day of April, 2021.  
9

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11 COCONINO COUNTY PUBLIC DEFENDER

12 \_\_\_\_\_/s/\_\_\_\_\_  
13 CHRISTINE M. BROWN  
14 Deputy Public Defender

15 Efiled this \_\_22\_\_ day of April, 2021 to:

16 Honorable Ted Reed  
17 Division 1

18  
19 Michael Tunink  
20 Deputy County Attorney

21 Defendant  
22 c/o CCDF  
23

24 By: \_\_cmb\_\_\_\_\_  
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