

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF LINN

1
2 STATE OF OREGON) Case No. 23CR46313
3 Plaintiff)
4 vs.) MOTION TO MODIFY
5 KYLA ROSE MAZHARY-CLARK) SECURITY RELEASE
6 Defendant) [DA Case No.: 071115]

7 COMES NOW THE STATE OF OREGON by and through Jenna Wallace, Special
8 Prosecutor for Linn County, and moves this Court for an Order to modify the defendant's Security
9 Release to include a condition of no contact with Sage Clark, Sadie Clark and Jamie Crompton, the
10 alleged victims of Count 7 – 8 and 10 – 13 in the Superseding Indictment. This motion is based on the
11 attached affidavit which by this reference is incorporated herein.

12 DATED: December 8, 2023.

13 LINN COUNTY DISTRICT ATTORNEY

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16 Jenna Wallace, OSB #154134
17 Special Prosecutor
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IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF LINN

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2	STATE OF OREGON)	Case No. 23CR46313
3)	
4	Plaintiff)	AFFIDAVIT IN SUPPORT OF
5	vs.)	MODIFYING SECURITY RELEASE
6)	
7	KYLA ROSE MAZHARY-CLARK)	
8	Defendant)	[DA Case No.: 071115]

9 STATE OF OREGON,)
 10) ss..
 11 County of Linn.)

12 I, Jenna Wallace, being first duly sworn, depose and state that I am a Special Prosecutor for
 13 Linn County, Oregon:

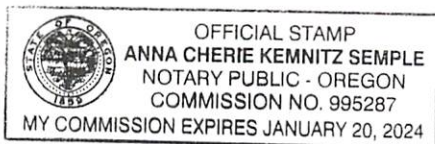
- 14 1. On September 22, 2023, a secret indictment was filed in the above-entitled case alleging the
 15 defendant had committed three counts of Perjury and a bench warrant issued for defendant's
 16 arrest.
- 17 2. On September 25, 2023, defendant signed a security release agreement in this case.
- 18 3. On October 26, 2023, defendant was arraigned on the secret indictment.
- 19 4. On December 7, 2023, the Grand Jury true billed a superseding indictment adding four (4) counts
 20 of perjury and six (6) counts of custodial interference in the second degree.
- 21 5. The six (6) counts of custodial interference in the second degree counts list Sage Clark, Sadie
 22 Clark and Jamie Crompton as the alleged victims of each count.
- 23 6. Based the new crime allegations, the state is requesting defendant's Security Release Agreement
 24 be modified to include a no contact condition of release with Sage Clark, Sadie Clark and Jamie
 25 Crompton.

26 **DATED:** December 8, 2023.

Jenna Wallace

 AFFIANT
 Jenna Wallace, OSB #154134
 Special Prosecutor

SUBSCRIBED AND SWORN to before me this 8th day of December, 2023.



Anna Cherie Kemnitz Semple

 NOTARY PUBLIC FOR OREGON
 My Commission Expires: 1/20/24