

Frederick L. Meier, II
Supreme Court No. 13317
425 Commercial St.
Emporia, KS 66801
(620)342-7600
(620)342-7608 fax
flmeier.attorney@yahoo.com

IN THE DISTRICT COURT OF LYON COUNTY, KANSAS

STATE OF KANSAS

Plaintiff

vs

Case No. 21CR340

JORDY CORNEJO-CAMPOVERDE

Defendant

MOTION TO MODIFY BOND

COMES NOW the Defendant, Jordy Cornejo-Campoverde, by and through his attorney, Frederick L. Meier, II, and moves the Court for an order significantly reducing his bond.

The Court and counsel has access to the same document, which is referred to throughout without specific attribution.

Prior to the killing of Mr. Avila, one individual purchased a weapon, test fired it, purchased ammunition, and stated his intention to kill Avila. That individual was not Jordy Cornejo-Campoverde.

The same individual got into a car with Avila and another, lured him to a remote location, and shot Mr. Avila. The car was then driven to another remote location by the second occupant. The individual contacted friends, asked them to bring their vehicle to the remote location and bring a gas can, which occurred. None of these individuals was Jordy Cornejo-Campoverde.

Upon arrival of the second vehicle, one individual took a subwoofer from the car's trunk,

and another took a AK47. Neither was Jordy Cornejo-Campoverde.

At the remote location, one individual handed the first a gas can, which he used to douse the interior of the car with gasoline. That individual was not Jordy Cornejo-Campoverde. Nor did he provide the lighter to set the car on fire.

Mr. Cornejo-Campoverde was not responsible for the planning, preparation, research, subterfuge or execution of the crimes of murder and robbery, nor did he conspire with any of these individuals in the respective portions of the crime.

In addition to the factual basis for the crimes that a Court must consider, there are additional facts to be reckoned with that were not available initially.

By Court order, Mr. Cornejo-Campoverde must surrender his passport and be monitored by GPS.

While not a citizen of the United States, Jordy has been a resident of Emporia, where he lives with his mother and completed his education at Emporia High School. Additionally, he was *both* a full time employee at Tyson and entering his second year as a full time student at Flint Hills VoTech, where he was studying construction engineering.

After being interviewed repeatedly during the course of this investigation, he traveled twice to Ecuador; more importantly, twice he returned to Emporia.

And Jordy retained counsel for the purposes of fight, not flight.

So, Mr. Cornejo-Campoverde would respectfully submit that his bond is excessive, unreachable, and unnecessary to ensure his continued presence in court, given all of these factors. It should be lowered significantly.

/s/ Frederick L. Meier, II
FREDERICK L. MEIER, II
Supreme Court No. 13317
425 Commercial
Emporia, Kansas 66801
620-342-7600
620-342-7608 *fax*
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that the Motion was filed electronically with the Lyon County District Court, and a true and correct copy shall be served on those parties directed by the Court on the Notice of Electronic Filing, pursuant to Administrative Order No. 268, K.1., and K.S.A. 60-205(b)(2)(E).:

Amy Aranda and Laura Miser
Lyon County Attorney

with bench copy to Hon. Jeffrey J. Larson,
on the 30th day of August, 2021.

/s/ Frederick L. Meier, II
Frederick L. Meier, II