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STATE OF OREGON
Marion County Circuit Courts
APR 27 2011
FILED

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

THE STATE OF OREGON) No. 11C40698
Plaintiff,)
vs.) STATE'S RESPONSE TO DEFENDANT'S
RAMIRO NAVARRO JR,) MOTION TO WITHDRAW GUILTY PLEA
Defendant.)

The defendant's plea to the charges in 11C40698 was made freely and voluntarily with knowledge of the collateral effects a guilty plea would have on his military career.

In the defendant's plea petition, paragraph 9 indicates that he would be unable to possess a firearm and that a conviction may prevent him from serving in the United States Armed Forces.

Additionally, the defendant made several phone calls from the jail indicating that he thought pleading guilty would end his military career. In one call, a caller who appears to be the defendant's sergeant told the defendant that the military was already working on kicking him out, even before a plea had been entered. The defendant told the caller that he could not be on probation and be in the military, and that he could not have a felony and be in the military. The caller went on to tell the defendant that his career is in jeopardy, regardless of whether a plea is entered or not.

In another phone call, the defendant told a different caller that the he believed "as of right now, I am kicked out of the army". The caller responded by mentioning that the

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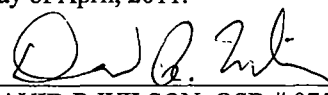
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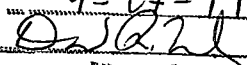
only way he could continue his military career would be for him to have only
misdemeanor convictions.

The court should not grant the defendant's motion to withdraw his guilty plea
because the pleas were freely and voluntarily made.

Dated at Salem, Oregon, this 27th day of April, 2011.



DAVID R WILSON, OSB # 075610
Deputy District Attorney

STATE OF OREGON)
County of Marion)
I hereby certify that I am an attorney for
plaintiff and I served the within documents
upon Ted Coran by
having a true copy of the document (file
on 4-27-11


Attorney for Plaintiff

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