

**IN THE CIRCUIT COURT OF CRAIGHEAD COUNTY, ARKANSAS
WESTERN DISTRICT
CRIMINAL DIVISION**

STATE OF ARKANSAS

PLAINTIFF

VS.

NO. 16JCR-25-458

KRISTIN BELL

DEFENDANT

MOTION TO MODIFY NO CONTACT ORDER

COMES now Defendant, Kristin Bell, by and through her attorneys, Stanley & Woodard, PLC, and for her Motion to Modify No Contact Order, states:

1. The Defendant is charged with the offenses of Permitting Child Abuse, Ark. Code Ann. § 5-27-221 and Failure to Notify by Mandated Reporter - 1st Degree, Ark. Code Ann. § 12-18-201.

2. A bond hearing was conducted by the Craighead County District Court on April 21, 2025, and bail was set at \$100,000 cash or surety to ensure the appearance of the Defendant in court. See, Ark. R. Crim. P. 9.1.

3. Additionally, the Court entered a No Contact Order directing Defendant to stay away from her place of employment at Engage of Jonesboro (hereinafter “Engage”) and Delta Institute for Developing Brain (hereinafter “Delta”) issued at 1919 Craighead County Road 333, Jonesboro, Arkansas, 72401. Further, the order directed her to have no contact with any student

or parent/guardian of any student. (Technically, the Order only named Engage however Engage and Delta operate from the same physical location and have the same students.)

4. Defendant moves the Court to modify the No Contact Order by removing the listed address, allowing Defendant to return to work and to have contact with the parents of students that choose to remain with the school.

5. The school consists of two entities, Engage and Delta. Although they operate from the same location, they are different entities that perform different functions. Engage is a for-profit entity that primarily provides counseling and occupational therapy to the student. Delta is the actual school duly licensed by the State of Arkansas as such.

6. Engage and Delta both provide highly specialized and unique services to their students. If the Court allows it, and for privacy purposes, the details will be provided to the Court in a confidential setting. To say the least, this is an underserved area and the services of this school are badly needed. Defendant is a key part of this school and needs to be allowed to return to work.

7. The student involved in this allegation is no longer with the school and a few other students have left. The vast majority of the students have remained at the school. The parents of these students are very involved in the school and intend to remain if the school can continue to provide the services needed.

8. Defendant requests a hearing on this matter as soon as possible and intends to present affidavit and testimony from the parents of the students still attending. The relief to be requested is modification of the No Contact Order to allow Defendant to return to the school location and modified to allow Defendant to have contact with all students that still attend the school as well as their parents/guardians.

9. It will be extremely difficult for this school to continue providing such specialized services without the assistance of Defendant.

WHEREFORE, the Defendant prays that this Court grant her Motion to Modify the No Contact Order to allow Defendant to return to work and have contact with the students of parents of the school and for all other just and proper relief to which she may be entitled.

Respectfully submitted,

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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on 20th day of May, 2025, I electronically filed the foregoing with the clerk of the Court by using the eFlex system, which will send electronic notice to counsel of record:

Sonia Hagood
Prosecuting Attorney
Attorney for State of Arkansas

/s/ Bill Stanley _____
Bill Stanley