

IN THE CIRCUIT COURT OF CRAIGHEAD COUNTY, ARKANSAS  
CRIMINAL DIVISION

STATE OF ARKANSAS

PLAINTIFF

VS.

16JCR-25-NYF

KATHRINE LIPSCOMB

DEFENDANT

**MOTION TO MODIFY NO CONTACT ORDER**

COMES now Defendant, Kathrine Lipscomb, by her attorney, Randel Miller, and for her *Motion To Modify No Contact Order*, states and alleges the following:

1. The Defendant is charged with the offenses of Permitting Child Abuse, A.C.A. 5-27-221 and Failure To Notify By Mandated Reporter 1<sup>st</sup> Degree, A.C.A. 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 the Developing Brain (hereinafter “Delta”) located at 1919 Craighead County Road 333, Jonesboro, Ar 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.)

3. Defendant moves this 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 and students that chose to remain with the school.

4. 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 occupation therapy to the student. Delta is the actual school duly licensed by the State of Arkansas as such.

5. Engage and Delta both provide highly specialized and unique services to their students. If the Court will allow it, and for privacy purposes, the details will be provided to the Court in a confidential setting. To say the least, this is an under served 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.

6. 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 needed services.

7. Defendant requests a hearing on this matter as soon as possible and intends to present affidavits and testimony from the parents of the students still attending. The relief to be request 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.

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

WHEREFORE, the Defendant requests the Court to 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 is entitled.

Respectfully submitted,

KATHRINE LIPSCOMB  
DEFENDANT

/S/ RANDEL MILLER

Randel Miller #83127

Attorney for Defendant

1009 S Main St

Jonesboro, Ar. 72401

Telephone: (870) 972-9940

Facsimile: (870) 932-8366

[rmiller@randelmiller@randelmillerlaw.com](mailto:rmiller@randelmiller@randelmillerlaw.com)

CERTIFICATE OF SERVICE

I, Randel Miller hereby certify that a true and correct copy of the foregoing has been served to the following via electronic filing and by email, this 14<sup>th</sup> day of May, 2025 to the following:

VIA EMAIL:

[fonticiella2@gmail.com](mailto:fonticiella2@gmail.com)

Sonia Hagood

Deputy Prosecuting Attorney

/S RANDEL MILLER

Randel Miller