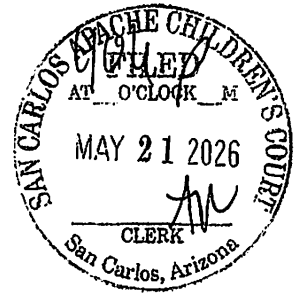


San Carlos Apache Tribe
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**IN THE SAN CARLOS APACHE CHILDREN'S COURT
SAN CARLOS APACHE RESERVATION
SAN CARLOS, ARIZONA**

IN THE MATTER OF:

Case No.: CW-2024-0024

BRANDON LEE SALTER,
DOB 01/09/2013

**MOTION FOR CHANGE IN PHYSICAL
CUSTODY OF BRANDON LEE SALTER
TO SOPHIA MODLESS**

WILL WILLIS MODLESS,
DOB 12/29/2014

ZACHARIA MATHEW MODLESS,
DOB 02/03/2017

(Expedited Ruling Requested)

Minor Children

Honorable Judge Sherrie Harris

The San Carlos Apache Tribe, by and through undersigned counsel, hereby requests the Court order that the Minor Child, Brandon Lee Salter, remain a ward of the Court in the legal care, custody and control of the Tribe's Child Protective Services and that the Minor Child, be placed in the physical care of Sophia Modless, a paternal aunt. This request is made for the following reasons:

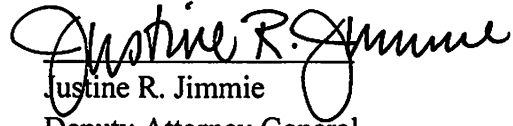
1. The Minor Child has been placed at a group home run by Catalyst Community Corporation in Mesa since March 19, 2026.
2. The current placement is at risk of disruption because the Minor Child has been bullied and has been attacked by fellow residents of the group home

- 1 3. The Minor Child recently has begun "acting up" at the group home and at
2 school, where he was getting into trouble. The Minor Child was suspended
3 from school for the rest of the semester.
- 4 4. The Minor Child also expressed his desire to return to the home where his
5 younger siblings reside.
- 6 5. The Minor Child's younger siblings remain in the care of Sophia Modless in
7 San Carlos.
- 8 6. The Minor Child previously was in the care of Sophia Modless but was sent to
9 a program for treatment.
- 10 7. Since that time, Ms. Modless has accompanied the younger siblings to
11 counseling and has participated in some sessions herself.
- 12 8. She has learned ways to address the children's behaviors and believes she now
13 can also address the Minor Child's behaviors. She plans to enroll him in
14 counseling as well.
- 15 9. Ms. Modless has learned of the bullying of her nephew at the group home and
16 contacted CPS to ask for him to be returned to her home.
- 17 10. Ms. Modless told CPS that she has support of other family members to assist
18 in the care of the Minor Child.
- 19 11. Zahra Goseyun, the CPS case manager for the Minor Child, recommends that
20 the Brandon Lee Salter, be placed with Sophia Modless, paternal aunt.
- 21 12. The Tribe requests an expedited ruling because of the pending disruption of
22 the current placement that led to the minor child being dropped off at TSS
23 offices.

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27 Based on the foregoing reasons, it is requested that the Minor Child, Brandon Lee
28

1 Salter, remain a ward of the Court and remain under the supervision of CPS and placed
2 with Sophia Modless, paternal aunt, until further order of the court.

3 RESPECTFULLY SUBMITTED this 21st day of May, 2026.
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6 Justine R. Jimmie
7 Deputy Attorney General
8 San Carlos Apache Tribe
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