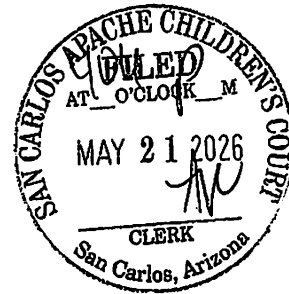


San Carlos Apache Tribe
Department of Justice
Criminal Division
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IN THE SAN CARLOS APACHE CHILDRENS COURT
SAN CARLOS APACHE RESERVATION
SAN CARLOS, ARIZONA

IN THE MATTER OF:

Case No.: CW-2024-0024

BRANDON LEE SALTER,
DOB 01/09/2013

WILL WILLIS MODLESS,
DOB 12/29/2014

ZACHARIA MATHEW MODLESS,
DOB 02/03/2017

Minor Children

Motion for Authority and Consent

The San Carlos Apache Tribe, by and through its Representative undersigned petitions the Children's Court, pursuant to **Title V, Chapter V, Section 26. J. Effect of Guardianship;** including the **Authority and Consent**. The San Carlos Apache Tribe, by and through its Deputy Attorney General, Justine R. Jimmie, respectfully requests the San Carlos Apache Tribal Children's Court to issue an order for **Authority and Consent** over the Minor Child to the San Carlos Apache Tribal Social Services ("TSS") and allow Authority and Consent or transfer of its provisional care for the Minor Child to the appointed Relative Placement based on the following:

1) The ("Minor Children") Brandon Lee Salter, Will Willis Modles, and Zacharia Matthew Modless (age: 9) are dependent Native American Indian Minor Children and have been deemed Wards of the San Carlos Apache Tribe Children's Court.

2) The Minor Children are placed in the care and custody of the San Carlos Apache Tribal Social Services. Additionally, Tribal Social Services is appointed to provide provisional care and custody of the Minor Children pending further court proceedings.

3) **CPFC Chapter III. Sec 14.A.1. Relatives;** The San Carlos Apache Tribal Social Services will provide temporary custodial care. Relative Placement has been established with the Minor Children's paternal aunt, Sophia Modless.

4) Current Placement address:

Placement: Sophia Modless, Paternal Cousin

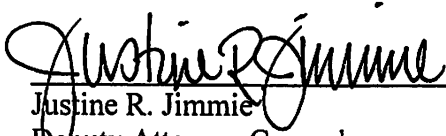
Physical Address: Near turn off to Three Tanks,
Seven Mile Wash District
San Carlos, AZ 85550

P.O. Box 1198
San Carlos, AZ 85550

Pursuant to **CFPC Section 26. J. Effect of Guardianship.** A guardian appointed by order of the Court may have authority over the custody and care of a child to include **Authority to Consent** to authorize any medical treatment, emergency procedures, educational and provisional care necessary not to further jeopardize the Children's lives. Every effort will be made to grant the best interest of the Minor Children.

Based on the above, the Tribe requests the issuance of Authority and Consent of the Minor Children, which will allow Sophia Modless to be appointed by order of the Children's Court to have Authority to Consent for the Minor Children's necessary provisional care.

Respectfully Submitted, this 21st day of May, 2026.


Justine R. Jimmie
Deputy Attorney General
San Carlos Apache Tribe