

State of Wisconsin:

Circuit Court:

Milwaukee County:

State of Wisconsin,

Plaintiff,

v.

Case No. 2525CT009561

John Doe,

Defendant.

Notice of Motion and Motion for Expungement

Please take notice that on the _____ day of _____, 2010, at _____, or as soon thereafter as counsel may be heard, the above-captioned defendant will appear before that branch of the Milwaukee County Circuit Court presided over by the Honorable _____, and will then and there move the court, pursuant to Sec. 973.015, Stats., to expunge the conviction in this matter from the defendant's record.

As grounds, the undersigned shows to the court as follows:

1. That at the time of the offense in this matter the defendant, John Doe, was under the age of twenty-one years.

2. The defendant was convicted upon his guilty plea; and, on February 30, 2005, the court sentenced Doe to one year probation with thirty days in the House of Correction as a condition of probation. The court specifically authorized Doe to apply for expungement in the event that he successfully completes probation, and commits no new offenses.

3. The defendant completed probation and was discharged. His probation was never revoked. He has committed no new offenses since the offense in this case.

4. Sec. 973.015(2)(a), Stats., provides, "A person has successfully completed the sentence if the person has not been convicted of a subsequent offense and, if on probation, the probation has not been revoked and the probationer has satisfied the conditions of probation."

Wherefore, it is hereby requested that the court enter an order expunging the record in this case.

Dated at Milwaukee, Wisconsin, this _____ day of March, 2010:

Law Offices of Jeffrey W. Jensen
Attorneys for the Defendant

By: _____

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