

IN THE CRIMINAL COURT OF HAMILTON COUNTY, TENNESSEE

STATE OF TENNESSEE	*	NOS. 270962
v.	*	
KEELE CAMILLE PAYNE	*	DIVISION III

MOTION TO REDUCE BOND

Comes now the Defendant, Keele Camille Payne, and moves this Honorable Court to reduce the bond in this case. The defendant has been charged with the offenses of theft of property over \$60,000, theft of services over \$10,000, theft of property over \$1,000, (2 counts), theft of services over \$1,000, theft of property over \$500 (3 counts), and forgery. The defendant's bond is fixed at \$100,000. In support of this Motion, defendant would show the following:

1. The defendant, if released, will not flee the jurisdiction of this Court and will appear at any and all hearings which this Court or any other may require.
2. The defendant does not pose danger to any other person or persons.
3. The defendant will not and has not jeopardized the safety of any witness in this cause.
4. The defendant will seek employment upon her release.

WHEREFORE, the defendant respectfully moves the Court to reduce her bond for the reasons set forth in the premises of this motion.

Respectfully submitted,

ARDENA J. GARTH
DISTRICT PUBLIC DEFENDER

By: *Ardena J. Garth*

FILED IN OPEN COURT

DATE: 4-14-09

BY: *[Signature]*

OFFICE OF DISTRICT PUBLIC DEFENDER
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