## IN THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI

STATE OF MISSOURI,	)
vs	) ) Cause No. <u>19<b>BA-CR02726</b></u>
Regine Hope McCracken	)

## **MOTION TO REVOKE BOND**

Tisonords / Tison Social November 20, 20, 8, 17,20 AV

COMES NOW the State, by and through undersigned counsel, and under Missouri Supreme Court Rule 33, respectfully moves this Court to revoke Defendant's bond in the above-captioned case. In support thereof, the State offers the following:

- 1. On July 3, 2019, Defendant was arrested by Columbia Police Department for the offenses of assault in the second degree, assault in the fourth degree, and operating a vehicle in a careless and imprudent manner.
- 2. The State filed the same charges on that same date.
- 3. On July 8, 2019, Defendant posted a surety bond.
- 4. On November 20, 2019, the State is charging Defendant with the offenses of involuntary manslaughter in the first degree, assault in the fourth degree, and operating a vehicle in a careless and imprudent manner.
- 5. Defendant is known to have the following prior findings of guilt and/or convictions: driving while revoked (2015), driving while revoked (two offenses in 2013), and assault (2013).
- 6. Defendant poses a danger to the victim and/or the community because she was "facetiming" while driving in a high traffic area and collided with two pedestrians, causing the death of one of the victims. Defendant has also been involved in other road rage incidents since this crash.
- 7. Defendant is believed to be a flight risk because she is now facing even more serious charges and has a greater reason to flee.

8. For the reasons stated above, the State would request that a warrant be issued and bond be set at \$50,000 CASH ONLY. The State would further request that the following bond conditions be added:

a. The defendant will appear in the court in which the case is prosecuted or appealed, from time to time as required to answer the criminal charge.

b. The defendant will submit to the orders, judgment and sentence, and process of the court having jurisdiction over the defendant.

c. The defendant shall not commit any new offenses and shall not tamper with any victim or witness in the case, nor have any person do so on the defendant's behalf.

d. The defendant will comply fully with any and all conditions imposed by the Court in granting release.

e. The defendant will not operate a motor vehicle.

WHEREFORE, the State respectfully requests that this Court set bond in the amount and with the conditions requested above.

FOR Nicholas J. Komoroski Assistant Prosecuting Attorney 11.601 (1.701 ) (1.700 ) (1.7

Bar No. 52675

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## CERTIFICATE OF SERVICE

I hereby certify on this 20<sup>th</sup> day of November, 2014, an electronic copy of the foregoing was sent through the Missouri e-Filing System to: Matthew B Uhrig

/s BM