

IN THE CIRCUIT COURT OF THE FOURTEENTH JUDICIAL CIRCUIT,
IN AND FOR BAY COUNTY, STATE OF FLORIDA

STATE OF FLORIDA

Case No.: 06-4016 CFMG

v.

Judge Overstreet

KRISTIN SCHMIDT
_____ /

STATE'S RESPONSE TO DEFENDANT'S MOTION TO MODIFY BOND

THE STATE OF FLORIDA, by and through the undersigned Assistant State Attorney, hereby responds to the Motion to Modify Bond filed by Defendant Kristin Schmidt, through counsel, on December 4, 2006.

1. A condition of the Defendant's bond in this case is the Defendant may not leave Bay County.
2. The State has discussed this matter with Jim Appleman, Esq., counsel for the Defendant.
3. The State has been advised that the Defendant is requesting permission to depart Bay County on December 6, 2006, and return to Bay County on December 9, 2006. The purpose for the Defendant leaving Bay County on those dates is for the Defendant to travel to Alabama to assist her child relocate from Alabama to Bay County.
3. The State has no objection to the Court granting permission for the Defendant to leave Bay County on December 6, 2006, and to return to Bay County on December 9, 2006, for the limited purpose of traveling to Alabama and assisting her child in moving from Alabama to Bay County.
4. The State requests that the permission to leave Bay County be limited to December 6, 2006 through December 9, 2006, and be limited to the purpose discussed in

HAROLD HAZZEL
CLERK OF THE CIRCUIT COURT
BAY COUNTY, FLORIDA

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this response. The State objects to any other modifications or exceptions to the conditions of bond.

I HEREBY CERTIFY that a copy of the foregoing has been furnished by facsimile and by mail to Jim Appleman, counsel for defendant Kristin Schmidt, 436 McKenzie Avenue, Panama City, FL 32402-0880, on this 4th day of December, 2006.

MARK A. OBER
STATE ATTORNEY

A handwritten signature in black ink, appearing to read "M. Sinacore", written over a horizontal line.

Michael C. Sinacore
Assistant State Attorney
Florida Bar #0868523