

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

STATE OF FLORIDA,
Plaintiff,

v.

Case No.: 06-4016 CFMG
Judge Overstreet

KRISTIN ANNE SCHMIDT,
Defendant.

HAROLD BAZZELLE
CLERK OF CIRCUIT COURT
BAY COUNTY, FLORIDA

1 2006 DEC 14 P 2:51

FILED

MOTION TO MODIFY BOND

COMES NOW the Defendant, KRISTIN ANNE SCHMIDT, by and through her
undersigned attorney, and files this Motion to Modify Bond and as grounds therefore states:

1. Defendant has been charged with Aggravated Manslaughter of a Child and was given a bond amount of \$25,000.00.
2. The bond currently states that Defendant may not leave Bay County, Florida.
3. Defendant has a child who currently attends college in the State of Alabama and is transferring to Gulf Coast Community College in Bay County. Defendant is responsible for the transportation and requests that the restriction or travel outside of Bay County, pursuant to the bond that is in place now and that she be allowed to travel for the purposes of transporting her child from school in the State of Alabama back to Bay County, Florida.
4. Defendant is a resident of Panama City Beach, Florida, Bay County, Florida
5. Defendant is not a flight risk or a danger to the community.

WHEREFORE, the Defendant, KRISTIN ANNE SCHMIDT, respectfully
requests the Court to release her on any reasonable conditions the Court deems necessary.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by facsimile to the Office of the State Attorney, 1-813-274-1976 on this 4th day of December, 2006.

APPLEMAN & SHEPARD, LAW OFFICES, P.A.



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ATTORNEY FOR DEFENDANT

Assistant State Attorney _____