##### MOTION TO INCREASE BOND

##### State of Wisconsin

 PLEASE TAKE NOTICE that on the day of , 20\_\_ at , the State of Wisconsin, plaintiff, will move the court pursuant to the provisions of Section 969.08, Wisconsin Statutes, for the increase of the defendant's bond for the reasons set forth below:

1. The defendant was been convicted of three Class B felonies of First Degree Sexual Assault of a Child, and is no longer presumed innocent.
2. The defendant is pending sentencing on , 20\_\_, an adjourned sentencing date, where the Department of Corrections, through the present investigation, is recommending the maximum period of incarceration, and where the State will be making a similar recommendation to the court, thereby providing an incentive for the defendant to flee the jurisdiction.
3. The defendant currently has posted $10,000 in bond, which has been posted by his parents, and not by the defendant personally. A portion of this bond money has previously been assigned to Attorney who represented the defendant through the jury trial. Additional monies owing to Attorney have been promised to him from the bond monies on deposit, but a formal assignment has not taken place.
4. The defendant has moved to discharge Attorney from representing him at the sentencing hearing, thereby evidencing disenchantment between the defendant and Attorney .
5. That in the event the defendant were to violate terms and conditions of his bond and the bond would be subject to forfeiture by the court, Attorney would in all likelihood assert a request for a return of a portion of the bond monies to cover his legal fees, a request which historically has been granted oftentimes by the circuit courts of Kenosha County.
6. At the time the verdict was returned, the State moved the court for revocation of the defendant's bond pending sentencing, which motion was denied by the Honorable , pursuant to the directions of this court. No subsequent bond hearings have been brought before the court.
7. The State believes that under the circumstances, the defendant has little incentive to comply with the terms and conditions of bond, and that bond which is currently set is insufficient to assure his appearance in court.

 WHEREFORE, the State requests that the bond be increased and/or revoked pending sentencing.

 Dated:

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 Assistant District Attorney