

5. The same statute also states there should be a presumption that the conditions of release shall be nonmonetary in nature.

6. Given the Expert Opinion and the Ehlert's case requirements, there is a reasonable likelihood that the State will not be able to meet its burden of proof.

WHEREFORE, Defendant, Angela R. Siebke, respectfully requests that she be released on recognizance and this matter be set for trial.

Respectfully submitted,

By: /s/ Steve Hanna
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PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on September 9, 2021.

By: US Mail Hand Delivered Certified Mail
 Fax E-File

/s/ Christopher Boley