

STATE OF INDIANA
II

FILED IN THE DEARBORN SUPERIOR COURT

COUNTY OF DEARBORN

GENERAL TERM 2011
MAY 13 2011

STATE OF INDIANA

-v-

Atul J. Shah

CAUSE NO: 15D02-1103-FD-084

DANIEL BREWINGTON

CLERK OF DEARBORN CIRCUIT COURT

APPLICATION FOR REDUCTION OF BAIL

The Defendant, Nancy Kruthaupt, by counsel, requests this Court pursuant to I.C. 35-33-8-5(c) to reduce the amount of bail to an amount no higher than is reasonably required to assure the Defendant's appearance in Court. In support of this motion, the Defendant states:

1. The Defendant has been charged with the crimes of Intimidation, a Class A Misdemeanor, in two counts; Intimidation of a Judge, a Class D Felony; Attempt to Commit Obstruction of Justice, a Class D Felony; Perjury, a Class D Felony; and Unlawful Disclosure of Grand Jury Proceedings, a Class B Misdemeanor; and Battery with a Deadly Weapon, a Class C Felony.

2. Bail has been set in the amount of \$500,000 surety and \$100,000 cash bond.

3. Because the background information to be produced at the hearing requested herein creates a strong inference that Defendant will appear as required, he should be admitted to bail in a reasonable, and lower, amount.

4. The bail set herein violates Defendant's statutory (I.C. 35-33-8-4) and constitutional (Ind. Const. Art. 1, Sections 16 and 17) rights because the amount is excessive based on the defendant's past criminal record, his ties to the community, his financial ability to make bail and the amount required to reasonably assure his appearance in court.

15D02-1103-FD-00084, 2 Pgs
05/13/2011
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WHEREFORE, Defendant requests:

A. That he be accorded a prompt hearing on the issues raised by this application.

B. That he be admitted to bail in the lowest amount reasonable to assure his appearance in Court.

John H. Watson, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon all parties or counsel of record as listed below, by United States Mail, postage pre-paid, on this 13 day of May, 2011.

F. Aaron Negangard
Prosecuting Attorney
Dearborn County Courthouse
Lawrenceburg, IN., 47025

By: [Signature]
John H. Watson, [REDACTED]