

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

FILED

2007 JAN 10 P 3: 58

STATE OF FLORIDA,
Plaintiff,

v.

Case No.: 06-4016 CFMG
Judge Overstreet

HAROLD BAZZEL
CLERK OF CIRCUIT COURT
BAY COUNTY, FLORIDA

KRISTIN ANNE SCHMIDT,
Defendant.

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 needs to meet with David Fugett, Attorney at Law, who is representing her in civil issues related to this case, Attorney Fugett's office is located in Pensacola, Florida. A specific date has not be set pending the outcome of this motion. Defendant will advise undersigned attorney and all required parties once a date is set, but would request that she be permitted to meet with Attorney Fugett whenever he see necessary to discuss matters of her case and will notify all required parties on each date.
4. Defendant also requests permission to travel to Montgomery, Alabama to handle matters involving her daughters financial situation at school. Defendant has advised because of recent employment set backs, there are financial issues that need to be addressed. Defendant has not set a date to travel to Alabama pending the outcome of this motion, but will keep all required parties informed of the dates.
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 allow her to travel to meet with Attorney David Fugett in Pensacola, Florida to discuss her civil matters and to travel to Montgomery, Alabama to address the matters involving her daughter's schooling.

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 10th day of January, 2007.

APPLEMAN & SHEPARD, LAW OFFICES, P.A.



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ATTORNEY FOR DEFENDANT

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