

**IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI**

STATE OF MISSOURI,)	
)	Date: March 24, 2021
Plaintiff,)	
)	Cause No. 21SL-CR00998
)	
vs.)	
)	Honorable James E Sullivan
ANGELA FREINER)	
Defendant.)	

MOTION TO RECONSIDER AND REINSTATE BOND

Comes Now the State of Missouri, by and through Assistant Prosecuting Attorney Douglas Sidel and respectfully requests this Court to reconsider and reinstate the bond of \$75,000 CASH ONLY, no 10% allowed. The State alleges the following in support:

1. On March 5, 2021, Defendant committed the offense of Tampering with a Judicial Officer, a Class D Felony. A warrant was issued on March 6, 2021, in the amount of 75,000 CASH ONLY, no 10% allowed, and a number of additional nonmonetary conditions.
2. On March 23, 2021 a bond hearing was held and the defendant was granted a Recognizance bond, with a number of additional nonmonetary conditions.
3. At this time, the State has been informed of further evidence highlighting the dangerousness of the defendant to the crime victim. The defendant was taken into custody on March 7, 2021. When officers approached the defendant, they observed her remove a bag she was carrying. Such bag contained a Black Taurus G2G Firearm, with 9 bullets in the magazine. Also contained within the bag carried by the defendant was drug paraphernalia and what the officers believe to be marijuana. Such

information was not known to the State of Missouri at the bond hearing held on March 23 2021.

4. After receiving this additional information, the State of Missouri respectfully requests that this Court Reconsider the Bond motion which was heard on March 24, 2021 and Reinstate the original bond of \$75,000 CASH ONLY with no 10% allowed. This new information documents a true and tangible threat to the safety of the victim in this case.

WHEREFORE, the State of Missouri respectfully requests that this Court reconsider the bond and reinstate the original bond of \$75,000 CASH ONLY, no 10% allowed.

Respectfully submitted,

/s/ Douglas Sidel, #30875
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CERTIFICATE OF SERVICE

This document was electronically filed in the Court file this 24th day of March, 2021, pursuant to Supreme Court Rule 103.08.

/s/ Douglas Sidel, #30875
Attorney At Law