

IN THE CIRCUIT COURT
TWENTY-FOURTH JUDICIAL CIRCUIT
COUNTY, ILLINOIS

THE PEOPLE OF THE STATE OF ILLINOIS,]	
	Plaintiff,]
vs]	No: _____
	,	
_____]	
	Defendant.]

VERIFIED PETITION TO DENY DEFENDANT PRETRIAL RELEASE
(725 ILCS 5/110-6.1)

NOW COME the People of the State of Illinois by James W. Kelley, State’s Attorney in and for the County of Randolph, State of Illinois, and respectfully request, pursuant to 725 ILCS 5/110-6.1, that this Court deny the above-named defendant pre-trial release. In support thereof, the People state as follows:

The proof is evident and the presumption great that the defendant committed an offense listed in 725 ILCS 5/110-6.1(a) AND

The defendant is charged with an offense under Section 110-6.1(a)(1), (1.5) or (3) through (7), and the defendant poses a real and present threat to the safety of any person or persons or the community;

The defendant is charged with an offense under Section 110-6.1(a)(1)-(7) OR any felony offense other than a Class 4, and the defendant has a high likelihood of willful flight to avoid prosecution. See 725 ILCS 5/110-6.1(a)(8);

The defendant is charged with a non-probationable drug offense under 720 ILCS 570/407(b), and no condition or combination of conditions can mitigate the real and present threat to the safety of any person or persons or the community, based on the specific articulable facts of the case, AND the defendant poses a serious risk to not appear in court as required. See 725 ILCS 5/110-6.1(e)(4);

The Defendant is charged with stalking or aggravated stalking and the Defendant’s pre-trial release poses a real and present threat to the physical safety of the victim of the alleged offense, and denial of release is necessary to prevent fulfillment of the threat upon which the charge is based. See 725 ILCS 5/110-6.1(a)(2).

THEREFORE, for the reasons stated above, and based upon the proffer the People request to make during the hearing on this petition pursuant to 725 ILCS 5/110-6.1(f)(2), the People pray that this Court deny the Defendant pre-trial release.

Respectfully submitted,
PEOPLE OF THE STATE OF ILLINOIS,

BY: _____
State's Attorney

DATE: _____

VERIFICATION BY CERTIFICATION

The undersigned attorney hereby certifies, as authorized by 735 ILCS 5/1-109, that the undersigned has read the contents of the foregoing document, has knowledge of the matters recited, and that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that the undersigned verily believes the same to be true.

BY: _____
State's Attorney

DATE: _____