

**IN THE CIRCUIT COURT IN AND FOR BREVARD COUNTY, FLORIDA,
EIGHTEENTH JUDICIAL CIRCUIT**

STATE OF FLORIDA,
Plaintiff,

CASE NO: 05-2019-CF-014067AXXX-XX

vs.
UMME KULSUM FERDOUSY,
_____ /

MOTION SET REASONABLE BOND

Defendant, Umme Kulsum Ferdousy, by and through undersigned counsel and pursuant to Fla. R. Crim. P. 3.131(c), Article I, Section 14 of the Florida Constitution, and Fla. Stat. 907.041, respectfully moves this Court to release Defendant on Defendant's own recognizance in the above-styled cause, or in the alternative to reduce the amount of Defendant's bail bond to a reasonable and affordable amount.

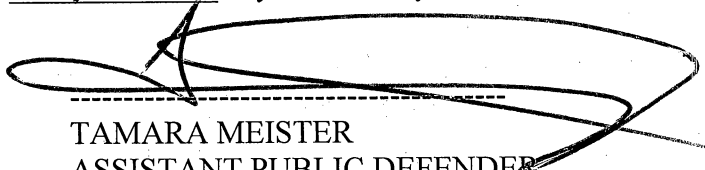
As grounds for this motion, Defendant states as follows:

1. Defendant is being held at the Brevard County Jail in Sharpes since her arrest on January 30, 2019 on the above referenced case on Initial Charges of Count 1 –Aggravated Abuse of Elderly Person, F-2, bond set at \$10,000.00, Count II – Aggravated Abuse of Elderly Person, F-2, bond set at \$10,000.00, Count III Battery on a Person 65 YOA or older, F-3, \$5,000.00 and Count IV – Aggravated Battery on Person 65 YOA or older, F-1, bond set at \$15,000.00. Total bond for both cases is \$40,000.00
2. An Information has not yet been filed as of today's date.
3. A lower bond would be requested in this cause.
4. Defendant is a Brevard County, Florida resident.
5. Defense counsel will make all other arguments ore tenus.
6. Defendant requests that the Court release him on his own recognizance or signature bond, but if the Court feels that posting of a monetary form of bail is necessary, Defendant would request that the amount set be reasonable.

WHEREFORE, Defendant, respectfully requests that the Court grant the relief requested and any and all other such relief as the Court deems just, legal and equitable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically (by E-service) to the Office of the State Attorney, 2725 Judge Fran Jamieson Way, Bldg. D., Viera, FL 32940, Brevard County, Florida, this 15th day of February, 2019.



TAMARA MEISTER
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