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Third Judicial District, Payette County
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IN THE DISTRICT COURT OF THE THIRD JUDICIAL DISTRICT OF

THE STATE OF IDAHO, IN AND FOR THE COUNTY OF PAYETTE

STATE OF IDAHO, Plaintiff, vs. ANDREA RENEE SHAW, Defendant.	**Case No. CR38-26-1685** **MOTION FOR BOND REDUCTION AND REQUEST FOR HEARING**

COMES NOW the Defendant, Andrea Renee Shaw, by and through her attorney of record, Joseph P. Filicetti of Filicetti Law Office, P.A., and hereby moves this court for entry of its order reducing bail.

THIS MOTION is based on the pleadings, papers, records and files in the above-entitled action.

REQUEST FOR HEARING

PLEASE TAKE NOTICE that the attorney for Defendant requests that the current Court address Defendant's Motion for Bond Reduction or escalate this case to District Court as time is of the essence.

FACTS

The Defendant, Andrea Shaw, was arrested on or about June 30th in Boise, Ada County,

Idaho, upon a Grand Jury Indictment with a $2,000,000 bond. At the time of her arrest, Andrea had just given birth via Caesarian section on June 25, 2026, three weeks prematurely. The newborn spent one night in the NICU before being with Andrea. Andrea was breastfeeding and using formula until her milk fully came in, prior to her arrest. The baby needs her mother to feed as she is not taking too much of the formula.

Andrea's entire network of family and support is located in the Payette and Ontario area. She has worked as a life coach for her brother's business. She and her husband Nate moved to Boise shortly after the incident due to mistreatment after multiple negative media reports about her case. She has faithfully been in contact with my office and has done absolutely nothing to avoid being detected or open to facing potential charges. She has only lived in Payette or Boise since 2015.

Andrea is sweet and quiet. She keeps to herself. She is not a threat to anyone. All of her family as well as my office will ensure that she appears in court to face her charges. She had claimed her innocence of these charges throughout the investigation. There are no confessions or statements that would indicate that she committed this horrendous allegation. While we have not seen any of the evidence or testimony due to the use of the Grand Jury, at best the State has a circumstantial case. The Defense has a phalanx of expert testimony that will dispute the State's allegations. The Defendant is presumed innocent of these charges until proven guilty.

Bond is for the purpose of ensuring the Defendant's attendance at Court. The Defendant is neither a flight risk nor any danger to society. Andrea does not have even a speeding ticket or parking ticket to her name. She has no failures to appear. There is no indication of any likelihood of her committing any new crimes while out on bond. She attends church in Payette and has the support of her church family. She does not own a passport. She will agree to any conditions the

Court would require. She has consistently proclaimed her innocence, and this Court should appreciate the fact that the State has taken a long time to make these charges, while she has stayed in the area awaiting the results on the investigation.

Andrea has the full support of the Children's Defense Alliance and is a named plaintiff in a lawsuit against the American Association of Pediatrics related to the vaccines with the twins who died in this case.

Of concern on an emergency basis is the fact that Andrea has a newborn that was born prematurely. The following list of potential complications was provided by a nurse expert witness and can be reduced to an affidavit if the Court so requests:

"Seven days after a cesarean delivery is a particularly important recovery period. If a postpartum mother is incarcerated, there are legitimate medical concerns that require prompt attention and continuity of care.

Some of the key risks and needs include:

- **Breastfeeding and milk expression:** If she is breastfeeding or her baby is unable to nurse, regular milk expression is important to reduce the risk of painful breast engorgement, plugged ducts, and mastitis. In some cases, untreated mastitis can progress to a breast abscess or more serious infection.

- **Postpartum blood pressure monitoring:** Women remain at risk for Postpartum preeclampsia, which can develop days or even weeks after delivery. Symptoms such as severe headache, vision changes, shortness of breath, swelling, or elevated blood pressure require urgent evaluation because untreated postpartum preeclampsia can lead to seizures, stroke, or other life-threatening complications.

- **Cesarean incision care:** The surgical incision should be monitored for redness, warmth, drainage, increasing pain, separation of the wound, or signs of infection. Depending on the type of closure, staples or other wound management may require evaluation or removal by an obstetric provider.

- **Postpartum hemorrhage:** Although the highest risk is immediately after birth, excessive vaginal bleeding can still occur during the first several weeks postpartum. Heavy bleeding, passing large clots, dizziness, or fainting require immediate medical assessment.

- **Infection:** Beyond the incision, postpartum women are at risk for uterine infection, urinary tract infections, and other postoperative complications. Fever, chills, worsening abdominal pain, foul-smelling discharge, or increasing tenderness should never be ignored.

- **Pain management and mobility:** Adequate pain control helps facilitate walking, which is important for recovery and reducing the risk of complications.

- **Blood clots:** Pregnancy and cesarean delivery substantially increase the risk of deep vein thrombosis and pulmonary embolism, particularly in the first few weeks postpartum. Early ambulation and prompt evaluation of leg swelling, chest pain, or shortness of breath are essential.

- **Mental health:** Screening for postpartum depression, anxiety, and other perinatal mental health conditions is recommended. The emotional stress of separation from a newborn and incarceration could increase the need for prompt mental health assessment and support.

- **Routine postpartum obstetric care:** A woman recovering from a cesarean section should have access to appropriate obstetric follow-up, including assessment of healing, bleeding, pain, blood pressure, medications, and any postoperative concerns.

These are recognized postpartum medical needs regardless of the circumstances. If someone seven days post-cesarean is in custody, access to appropriate obstetric care, monitoring, necessary medications, and accommodations for postpartum recovery and lactation are important considerations to reduce the risk of serious complications.

The Defense would ask this Court or the District Court to immediately reduce the bond to a manageable amount of bond to $100,000. This would ensure the State's interest in the Defendant's attendance at all future Court hearings. If Andrea was going to run, she would have done so long ago. Otherwise, this bond is merely punitive.

Dated this the 2nd day of July, 2026.

FILICETTI LAW OFFICE, P.A.

/s/ Joseph P. Filicetti
Joseph P. Filicetti
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of July, 2026, I caused a true and correct copy of the foregoing to be forwarded by the method(s) indicated below to the following persons:

Payette County Clerk 1130 3rd Ave. N. Payette, ID 83661	Hand Delivery U.S. Mail Facsimile E-File	_____ _____ _____ ____X___
Payette County Prosecutor 1115 1st Ave. N. Payette, ID 83661 prosecutingattorney@payettecounty.org	Hand Delivery U.S. Mail Facsimile E-File	_____ _____ _____ ____X___

*/s/ Rheanna Moser*_____
Rheanna Moser
Legal Assistant