

JON R. COX, ISB No. 4487
THE COX LAW FIRM, PLLC
199 N. Capitol Blvd., Ste. 601
Boise, Idaho 83702
Post Office Box 1828
Boise, Idaho 83701
Telephone: (208) 287-2008
Facsimile: (208) 287-2009
coxlaw@coxlawboise.com
jon@coxlawboise.com

Attorneys for Defendant

IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA

STATE OF IDAHO,)	
)	Case No. CR01-21-34839
Plaintiff,)	
)	
vs.)	MOTION FOR RELEASE ON
)	HIS OWN RECOGNIZANCE OR
AARON ANSON VON EHLINGER,)	FOR THE SETTING OF BOND
)	PENDING FURTHER PROCEEDINGS
Defendant.)	
_____)	

COMES NOW, the Defendant, Aaron Anson von Ehlinger, by and through his counsel of record and moves this Court to set bond in the above-entitled matter. A bond is requested on the grounds and for the reasons, including but not limited to the following:

1. The Defendant is 39 years old and has lived in Idaho for most of his life.
2. The Defendant has family, his mother and father who live in Myrtle, Idaho which is east of Lewiston Idaho.
3. The Defendant does not own any real property and relies on Military Disability income and Social Security income as his only source of income.

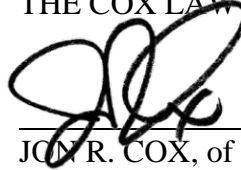
4. The Defendant does not have any other criminal history, and, accordingly, has not failed to appear for any court proceedings. The Defendant has retained private counsel but at this stage is unable to pay for ongoing representation. Counsel has undertaken the ongoing representation on a pro bono basis.
5. Counsel for the Defense has contemporaneously filed post trial motions and a request for the preparation of a trial transcript in order to prepare a memorandum in support of those motions.
6. The Defendant will abide by any restrictions, conditions, or prohibitions that the Court places on him and is prepared to surrender his passport.

The Defendant respectfully requests oral argument on this motion.

DATED this 13th day of May, 2022.

THE COX LAW FIRM, PLLC

By:



JON R. COX, of the firm

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th day of May, 2022 I caused to be served a true and correct copy of the foregoing document upon the following individual, by the method indicated, and addressed as follows:

Ada County Prosecuting Attorney's Office
200 W. Front Street, Rm. 3191
Boise, Idaho 83702

[] U.S. Mail, postage prepaid
[] Hand Delivered
[x] eFile/Email
acpocourtdocs@adaweb.net



ALICIA SCHIFFER