

Notice of Appearance and
Entry of Not Guilty Plea
Page 1 of 1


IN THE COMMON PLEAS COURT, UNION COUNTY, OHIO

STATE OF OHIO,	:	CASE NO.: 20 CR 0099
Plaintiff,	:	
v.	:	
STEFFEN BALDWIN,	:	<u>NOTICE OF APPEARANCE OF</u>
Defendant.	:	<u>COUNSEL AND ENTRY OF NOT</u>
		<u>GUILTY PLEA</u>

COURT OF COMMON PLEAS
 UNION COUNTY, OHIO
 2020 JUL 30 AM 10:11
 Michael J. Streng
 CLERK

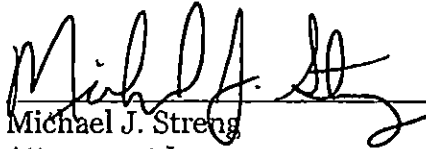
Now comes the undersigned counsel, and hereby enter their appearance on behalf of the defendant, Steffen Baldwin, in the within action. Further, Defendant, by and through undersigned counsel, hereby enters a plea of not guilty to all charges before this honorable court.

Respectfully submitted,


 BRIDGES, JILLISKY, STRENG,
 WELLER & GULLIFER, LLC
 MICHAEL J. STRENG (0072387)
 302 South Main Street
 Marysville, Ohio 43040
 Telephone: 937/644-9125
 Facsimile: 937/644-0754
 Email: mstreng@cfbjs.com
 Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing **Notice of Appearance and Not Guilty Plea** was served upon the Union County Prosecuting Attorney's Office, at 249 West Fifth Street, Marysville, Ohio 43040, by Facsimile Transmittal to 937-645-4191, this 30th day of July, 2020.


 Michael J. Streng
 Attorney at Law

Bridges, Jillisky,
 Streng, Weller &
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Jury Demand
Page 1 of 1


IN THE COMMON PLEAS COURT, UNION COUNTY, OHIO

STATE OF OHIO,	:	CASE NO.:	20 CR 0099
	:		
Plaintiff,	:		
	:		
v.	:		
	:		
	:		
STEFFEN BALDWIN,	:		
	:		
Defendant.	:	<u>REQUEST FOR JURY TRIAL</u>	

COURT OF COMMON PLEAS
 UNION COUNTY, OHIO
 2020 JUL 30 AM 10:40
 Steven K. Niccels
 CLERK

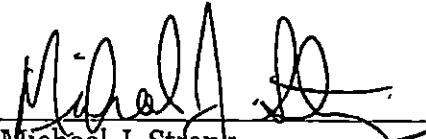
Now comes the defendant, Steffen Baldwin, by and through undersigned counsel, and hereby demands a jury trial in the within matter on all issues so triable.

Respectfully submitted,


 BRIDGES, JILLISKY, STRENG,
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 Email: mstreng@cfbjs.com
 Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing **Request for Jury Trial** was served upon the Union County Prosecuting Attorney's Office, at 249 West Fifth Street, Marysville, Ohio 43040, by Facsimile Transmittal to 937-645-4191, this 30th day of July, 2020.


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 Attorney at Law

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Request for Bill of Particulars

Page 1 of 2

IN THE COMMON PLEAS COURT, UNION COUNTY, OHIO

STATE OF OHIO, :

CASE NO.: 20 CR 0059

Plaintiff, :

v. :

STEFFEN BALDWIN, :

Defendant. :

DEFENDANT'S REQUEST FOR BILL OF PARTICULARS

COURT OF COMMON PLEAS UNION COUNTY, OHIO
2020 JUL 30 AM 10:20
Stephanie D. Nichol
CLERK

Now comes the defendant, Steffen Baldwin, by and through undersigned counsel, and hereby moves the Court to direct the State to provide Defendant with a bill of particulars specifically defining what conduct of the defendant is alleged to constitute the offense or offenses contained in the indictment.

A Memorandum in Support is attached hereto.

Respectfully submitted,



BRIDGES, JILLISKY, STRENG,
WELLER & GULLIFER, LLC
MICHAEL J. STRENG (0072387)
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Request for Bill of Particulars

Page 2 of 2

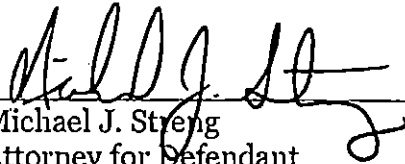
MEMORANDUM IN SUPPORT

Criminal Rule 7(E) gives the defendant an unqualified right to a bill of particulars. This right derives from Article I, Section 10 of the Ohio Constitution. The Ohio Supreme Court has stated that the failure of a trial court to compel production of the bill is error when a seasonable request has been made of the prosecution. *State v. Petro*, 158 Ohio St. 473, 485-486, 76 N.E.2d 355 (1947).

Additionally, the legislature has stated that, "[u]pon written request of the defendant . . . the prosecuting attorney shall furnish a bill of particulars setting up specifically the nature of the offense charged and the conduct of the defendant which is alleged to constitute the offense." R.C. § 2941.07.

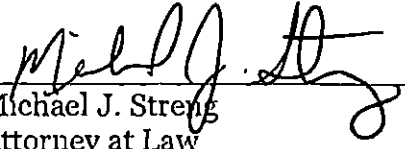
WHEREFORE, the defendant, Steffen Baldwin, respectfully requests that a Bill of Particulars be provided to undersigned counsel.

Respectfully submitted,


 Michael J. Streng
 Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing *Request for Bill of Particulars* was served upon the Union County Prosecuting Attorney's Office, at 249 West Fifth Street, Marysville, Ohio 43040, by Facsimile Transmittal to 937-645-4191, this 30th day of July, 2020.


 Michael J. Streng
 Attorney at Law

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Demand for Discovery
Page 1 of 3

IN THE COURT OF COMMON PLEAS, UNION COUNTY, OHIO

STATE OF OHIO,	:	CASE NO.:	20 CR 0009
Plaintiff,	:		
v.	:		
STEFFEN BALDWIN,	:		
Defendant.	:		<u>DEMAND FOR DISCOVERY</u>

COURT OF COMMON PLEAS
 UNION COUNTY, OHIO
 2020 JUL 30 AM 10:20
 Lisa K. Nickele
 CLERK

Now comes the defendant, Steffen Baldwin, by and through undersigned counsel, and hereby respectfully demands all discovery pursuant to Rule 16 of the Ohio Rules of Criminal Procedure and the Sixth and Fourteenth Amendments to the United States Constitution, including items that are material to the preparation of a defense, or are intended for use by the prosecuting attorney as evidence at the trial, or were obtained from or belong to the defendant, within the possession of, or reasonably available to the State, including but not limited to the following:

1. **STATEMENT OF THE DEFENDANT AND CO-DEFENDANT – Crim. R. 16(B)(1)**

All relevant written or recorded statements, or copies thereof, made by the defendant or a co-defendant, including police summaries of such statements, and including grand jury testimony by either the defendant or-defendant.

2. **CRIMINAL RECORDS(S) OF DEFENDANT, CO-DEFENDANT(S), AND WITNESSES – Crim. R. 16(B)(2)**

A copy of Defendant’s prior criminal record as well as the criminal record of any co-defendant and/or witness associated with the instant matter that would be admissible under Rule 609 of the Ohio Rules of Evidence of a witness in the state’s case-in-chief, or that is reasonably anticipates calling as a witness in rebuttal or surrebuttal. For purposes of this request, a “witness” shall include any person who has or claims to have knowledge or is believed to have knowledge concerning a fact or facts about the issue(s) involved in this criminal action or proceeding or about the credibility of another witness, irrespective of whether the State of Ohio intends to call such person as a witness at trial.

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Demand for Discovery

Page 2 of 3

3. DOCUMENTS AND TANGIBLE OBJECTS – Crim. R. 16 (B)(3)

All laboratory or hospital reports, books, papers, tangible objects, photographs, buildings or places or copies or portions, subject only to Crim. R. 16(D)(4) and Crim. R. 16(E).

4. REPORTS AND EXAMINATIONS AND TESTS – Crim. R. 16(B)(4)

Any results or reports of physical or mental examinations and of experiments or scientific tests, made in connection with the above-captioned case or copies, subject only to Crim. R. 16(D)(4) and Crim. R. 16(E).

**5. EVIDENCE FAVORABLE TO DEFENDANT – Crim. R. 16(B)(5);
U.S. Const. Amends. VI and XIV**

All evidence or information known or which may become known to the State of Ohio which may be favorable to Defendant and material to guilt or punishment, including information or evidence which could be used to obtain evidence that would diminish the credibility of any State's witness, as well as material relevant to either guilt or punishment. "[E]vidence that would diminish the credibility of any State's witness" includes, without limitation, plea bargains, pardons, grants of clemency, grants of immunity, informal or formal promises to speak on behalf of another in a legal proceeding, whether such accommodations have been extended on behalf of the witness or on behalf of a family member, friend or associate of the witness.

6. POLICE REPORTS – Crim. R. 16(B)(6)

All reports from peace officers, the Ohio State Highway Patrol, and federal law enforcement agents, both original and supplemental, the existence of which may be known or may become known to the State of Ohio and that are associated with the above-captioned matter.

7. WITNESS STATEMENTS – Crim. R. 16(B)(7)

All written or recorded statements, or copies thereof, made by a witness in the State's case-in-chief, or that it reasonably anticipates calling as a witness in rebuttal or surrebuttal. For purposes of this request, a "witness" shall include any person who has or claims to have knowledge or is believed to have knowledge concerning a fact or facts about the issue(s) involved in this criminal action or proceeding or about the credibility of another witness, irrespective of whether the State of Ohio intends to call such person as a witness at trial.

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Demand for Discovery

Page 3 of 3

8. **WITNESSES NAMES AND ADDRESSES – Crim. R. (16)(I)**

A written list of the names and addresses of all witnesses that State of Ohio intends to call in its case-in-chief, or reasonably anticipates calling in rebuttal or surrebuttal.

9. **EXPERT WITNESSES; REPORTS – Crim. R. 16(K)**

All written reports summarizing an expert witness's testimony, findings, analysis, conclusion, or opinion, and shall include a summary of the expert's qualifications.

Respectfully, this demand is continuing in nature. If, subsequent to compliance with this request, the State of Ohio discovers additional responsive materials, those materials shall promptly be transmitted to Defendant. In the event the State refuses to transmit such materials, the State of Ohio shall advise Defendant of its noncompliance to allow for determination of the discoverability of the withheld materials, pursuant to Crim. R. 16(C) and/or Crim. R. 16(D)(1)-(5) and/or Crim. R. 16(E)(1), (2).

Respectfully submitted,



**BRIDGES, JILLISKY, STRENG,
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Marysville, Ohio 43040

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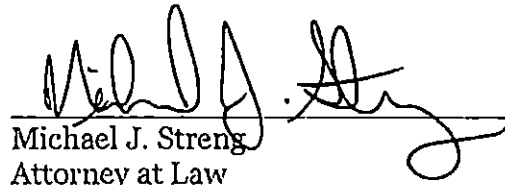
Facsimile: 937/644-0754

Email: mstreng@cfbjs.com

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing ***Demand for Discovery*** was served upon the Union County Prosecuting Attorney's Office, at 249 West Fifth Street, Marysville, Ohio 43040, by Facsimile Transmittal to 937-645-4191, this 30th day of July, 2020.



 Michael J. Streng
Attorney at Law

**Bridges, Jillisky,
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Motion
Page 1 of 6

IN THE COMMON PLEAS COURT, UNION COUNTY, OHIO

STATE OF OHIO, :
 :
 Plaintiff, :
 :
 v. :
 :

CASE NO.: 20 CR 0009

COURT OF COMMON
PLEAS
UNION COUNTY, OHIO
200 JUL 30 AM 10:20
James H. Niccels
CLERK


STEFFEN BALDWIN, :
 :
 Defendant. :

MOTION TO REMOVE WARRANT
OR REDUCE BOND

Now comes the defendant, Steffen Baldwin, by and through undersigned counsel, and hereby moves this court to remove the warrant and/or reduce his bond.

A memorandum in support is attached hereto.

Respectfully submitted,


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Motion
Page 2 of 6

MEMORANDUM IN SUPPORT

The defendant, Steffen Baldwin, was indicted by the Union County Grand Jury on or about June 19, 2020. The indictment was sealed and the State sought an arrest warrant as opposed to a summons. This court issued a warrant for Mr. Baldwin's arrest. Mr. Baldwin was arrested on or about July 23, 2020.

Rule 46 of the Ohio Rules of Criminal Procedure provides:

(A) Pretrial detention.

A defendant may be detained pretrial, pursuant to a motion by the prosecutor or the court's own motion, in accordance with the standards and procedures set forth in the Revised Code.

(B) Pretrial release.

Unless the court orders the defendant detained under division (A) of this rule, the court shall release the defendant on the least restrictive conditions that, in the discretion of the court, will reasonably assure the defendant's appearance in court, the protection or safety of any person or the community, and that the defendant will not obstruct the criminal justice process. If the court orders financial conditions of release, those financial conditions shall be related to the defendant's risk of non-appearance, the seriousness of the offense, and the previous criminal record of the defendant. Any financial conditions shall be in an amount and type which are least costly to the defendant while also sufficient to reasonably assure the defendant's future appearance in court.

(1) Financial conditions of release.

Any person who is entitled to release shall may be released upon one or more of the following types of financial conditions in the amount set by the court:

(a) An unsecured bail bond;

(b) A bail bond secured by the deposit of ten percent of the amount of the bond in cash. Ninety percent of the deposit shall be returned upon compliance with all conditions of the bond;

(c) A surety bond, a bond secured by real estate or securities as allowed by law, or the deposit of cash, at the option of the defendant.

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Motion
Page 3 of 6

(2)Non-financial conditions of release.

The court may impose any of the following conditions of release:

- (a) The personal recognizance of the accused;
- (b) Place the person in the custody of a designated person or organization agreeing to supervise the person;
- (c) Place restrictions on the travel, association, or place of abode of the person during the period of release;
- (d) Place the person under a house arrest, electronic monitoring, or work release program;
- (e) Regulate or prohibit the person's contact with the victim;
- (f) Regulate the person's contact with witnesses or others associated with the case upon proof of the likelihood that the person will threaten, harass, cause injury, or seek to intimidate those persons;
- (g) Require completion of a drug and/or alcohol assessment and compliance with treatment recommendations, for any person charged with an offense that is alcohol or drug related, or where alcohol or drug influence or addiction appears to be a contributing factor in the offense, and who appears based upon an evaluation, prior treatment history, or recent alcohol or drug use, to be in need of treatment;
- (h) Require compliance with alternatives to pretrial detention, including but not limited to diversion programs, day reporting, or comparable alternatives, to ensure the person's appearance at future court proceedings;
- (i) Any other constitutional condition considered reasonably necessary to reasonably assure appearance or public safety.

(C)Factors.

Subject to subsection (G)(2) of this rule, in determining the types, amounts, and conditions of bail, the court shall consider all relevant information, including but not limited to:

- (1) The nature and circumstances of the crime charged, and specifically whether the defendant used or had access to a weapon;
- (2) The weight of the evidence against the defendant;
- (3) The confirmation of the defendant's identity;

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Motion

Page 4 of 6

(4) The defendant's family ties, employment, financial resources, character, mental condition, length of residence in the community, jurisdiction of residence, record of convictions, record of appearance at court proceedings or of flight to avoid prosecution;

(5) Whether the defendant is on probation, a community control sanction, parole, post-release control, bail, or under a court protection order.

(D) Appearance pursuant to summons.

When summons has been issued and the defendant has appeared pursuant to the summons, absent good cause, there is a presumption of release on personal recognizance.

(E) Continuation of Bail.

When a judicial officer, either on motion of a party or on the court's own motion, determines that the considerations set forth in subsections (B) and (C) require a modification of the conditions of release, the judicial officer may order additional or different types, amounts or conditions of bail, or may eliminate or lessen conditions of bail determined to be no longer necessary. Unless a modification is agreed to by the parties, the court shall hold a hearing on the modification of bond as promptly as possible. Unless modified by the judicial officer, or if application is made by a surety for discharge from a bond pursuant to R.C. 2937.40, conditions of release shall continue until the return of a verdict or the entry of a guilty plea, or a no-contest plea, and may continue thereafter pending sentence or disposition of the case on review.

(F) Information need not be admissible.

Information stated in or offered in connection with any order entered pursuant to this rule need not conform to the rules pertaining to the admissibility of evidence in a court of law. Statements or admissions of the defendant made at a bail proceeding or in the course of compliance with a condition of bail shall not be received as substantive evidence in the trial of the case.

(G) Bond schedule.

(1) In order to expedite the prompt release of a defendant prior to initial appearance, each court shall establish a bail bond schedule covering all misdemeanors including traffic offenses, either specifically, by type, by potential penalty, or by some other reasonable method of classification. The court also may include requirements for release in consideration of divisions (B) and (C)(5) of this rule. The sole purpose of a bail schedule is to allow for the consideration of release prior to the defendant's initial appearance.

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Motion

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(2) A bond schedule shall not be considered as "relevant information" under division (C) of this rule.

(3) Each municipal or county court shall, by rule, establish a method whereby a person may make bail by use of a credit card.

(4) Each court shall review its bail bond schedule biennially by January 31 of each even numbered year, to ensure an appropriate bail bond schedule that does not result in the unnecessary detention of defendants due to inability to pay.

(H)Review of Release Conditions.

A person who has been arrested, either pursuant to a warrant or without a warrant, and who has not been released on bail, shall be brought before a judicial officer for an initial bail hearing no later than the second court day following the arrest. That bail hearing may be combined with the initial appearance provided for in Crim. R. 5(A).

If, at the initial bail hearing before a judicial officer, the defendant was not represented by counsel, and if the defendant has not yet been released on bail, a second bail hearing shall be held on the second court day following the initial bail hearing. An indigent defendant shall be afforded representation by appointed counsel at State's expense at this second bail hearing.

(I)Failure to appear; breach of conditions.

Any person who fails to appear before any court as required is subject to the punishment provided by the law, and any bond given for the person's release may be forfeited. If there is a breach of condition of release, the court may amend the bail.

(J)Justification of sureties.

Every surety, except a corporate surety licensed as provided by law, shall justify by affidavit, and may be required to describe in the affidavit, the property that the surety proposes as security and the encumbrances on it, the number and amount of other bonds and undertakings for bail entered into by the surety and remaining undischarged, and all of the surety's other liabilities. The surety shall provide other evidence of financial responsibility as the court or clerk may require. No bail bond shall be approved unless the surety or sureties appear, in the opinion of the court or clerk, to be financially responsible in at least the amount of the bond. No licensed attorney at law shall be a surety.

Criminal Rule of Procedure 46.

Mr. Baldwin is a 39 year old veteran of the United States military with no prior criminal record. Mr. Baldwin has made no attempts to flee or conceal his identity as is evident from

**Bridges, Jilisky,
Streng, Weller &
Gullifer, LLC**

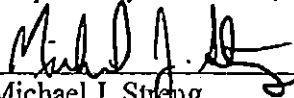
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Motion
Page 6 of 6

the State's ability to use Mr. Baldwin's residence address on his indictment and court filings. Mr. Baldwin used to live in Ohio but moved to California a couple years prior to this court's filing. Mr. Baldwin has retained counsel for defending this allegation and is not a flight risk.

WHEREFORE, the defendant, Steffen Baldwin, seeks the removal of the warrant and the setting of an appropriate and reasonable term of pretrial release as required by Criminal Rule 46 so that he can appear before this court on his own volition and at a time convenient to the court, parties and lawyers.

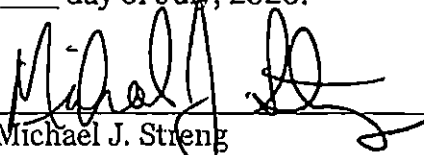
Respectfully submitted,



Michael J. Streng
Attorney at Law

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing **Motion to Remove Warrant and Reduce Bond** was served upon the Union County Prosecuting Attorney's Office, at 249 West Fifth Street, Marysville, Ohio 43040, by Facsimile Transmittal to 937-645-4191, this 30th day of July, 2020.



Michael J. Streng
Attorney at Law

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Motion
Page 1 of 3

IN THE COMMON PLEAS COURT, UNION COUNTY, OHIO


STATE OF OHIO,	:	CASE NO.: 20 CR 0090
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
STEFFEN BALDWIN,	:	
	:	<u>MOTION FOR VIDEO</u>
Defendant.	:	<u>ARRAIGNMENT</u>

COURT OF COMMON
 PLEAS
 UNION COUNTY, OHIO
 2020 JUL 30 AM 10:20
 Steven S. Nickel
 CLERK

Now comes the defendant, Steffen Baldwin, by and through undersigned counsel, and hereby moves this court to hold his arraignment by video.

A memorandum in support is attached hereto.

Respectfully submitted,


 BRIDGES, JILLISKY, STRENG,
 WELLER & GULLIFER, LLC
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Motion
Page 2 of 3

MEMORANDUM IN SUPPORT

The defendant, Steffen Baldwin, was indicted by the Union County Grand Jury on or about June 19, 2020. The indictment was sealed and the State sought an arrest warrant as opposed to a summons. This court issued a warrant for Mr. Baldwin's arrest. Mr. Baldwin was arrested on or about July 23, 2020.

Mr. Baldwin is being held in the Wayside Los Angeles County Jail pending extradition, which he has waived.

Rule 10 of the Ohio Rules of Criminal Procedure provides:

(A) Arraignment procedure.

Arraignment shall be conducted in open court, and shall consist of reading the indictment, information or complaint to the defendant, or stating to the defendant the substance of the charge, and calling on the defendant to plead thereto. The defendant may in open court waive the reading of the indictment, information, or complaint. The defendant shall be given a copy of the indictment, information, or complaint, or shall acknowledge receipt thereof, before being called upon to plead.

(B) Presence of defendant.

(1) The defendant must be present, except that the court, with the written consent of the defendant and the approval of the prosecuting attorney, may permit arraignment without the presence of the defendant, if a plea of not guilty is entered.

(2) In a felony or misdemeanor arraignment or a felony initial appearance, a court may permit the presence and participation of a defendant by remote contemporaneous video provided the use of video complies with the requirements set out in Rule 43(A)(2) of these rules. This division shall not apply to any other felony proceeding.

(C) Explanation of rights.

When a defendant not represented by counsel is brought before a court and called upon to plead, the judge or magistrate shall cause the defendant to be informed and shall determine that the defendant understands all of the following:

(1) The defendant has a right to retain counsel even if the defendant intends to plead guilty, and has a right to a reasonable continuance in the proceedings to secure counsel.

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Motion
Page 3 of 3

(2) The defendant has a right to counsel, and the right to a reasonable continuance in the proceeding to secure counsel, and, pursuant to Crim.R. 44, the right to have counsel assigned without cost if the defendant is unable to employ counsel.

(3) The defendant has a right to bail, if the offense is bailable.

(4) The defendant need make no statement at any point in the proceeding, but any statement made can and may be used against the defendant.

(D) Joint arraignment.

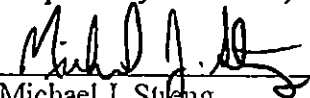
If there are multiple defendants to be arraigned, the judge or magistrate may by general announcement advise them of their rights as prescribed in this rule.

Criminal Rule of Procedure 10.

Criminal Rule 10(B)(2) allows for video arraignments. Mr. Baldwin is asking this court to hold a video arraignment while he is in custody at the Los Angeles County Jail Facility so that he is not held in custody for a lengthy period of time waiting his arraignment and so that this case may move forward in a more expedient manner.

WHEREFORE, the defendant, Steffen Baldwin, seeks that this court schedule a video arraignment.

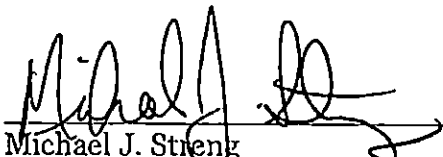
Respectfully submitted,



Michael J. Streng
Attorney at Law

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing ***Motion for Video Arraignment*** was served upon the Union County Prosecuting Attorney's Office, at 249 West Fifth Street, Marysville, Ohio 43040, by Facsimile Transmittal to 937-645-4191, this 30th day of July, 2020.



Michael J. Streng
Attorney at Law

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43040
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facsimile transmittal

Number of Pages Including this Cover Sheet: 2

To: Teresa Nickle, Union County Clerk Fax: (937) 645-3162

From: Michael J. Streng Date: 07/30/2020

Re: State vs. Steffen Baldwin
Case No.: 20 CR 0099

- Urgent
- For Review
- Please Comment
- Please Reply

Notes: Please find the attached documents for filing regarding the above mentioned case:

Notice of Appearance of Counsel and Entry of Not Guilty Plea, Request for Jury Trial, Demand for Discovery and Request for Bill of Particulars, Motion to Remove Warrant or Reduce Bond and Motion for Video Arraignment.

Thank you.

----- NOTICE -----

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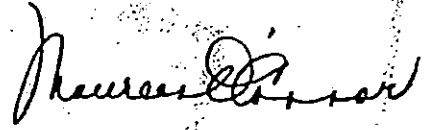
CONFIDENTIAL

The Supreme Court of Ohio

COURT OF COMMON
PLEAS
UNION COUNTY, OHIO
2020 JUN 17 PM 2:39
FILED
CLERK OF COURTS

CERTIFICATE OF ASSIGNMENT

The Honorable Mark S. O'Connor, a retired judge of the Logan County Court of Common Pleas, General Division, is assigned effective June 11, 2020 to preside in the Union County Court of Common Pleas, General and Domestic Relations Division for the period of June 11, 2020 through September 11, 2020 and to conclude any proceedings in which he participated that are pending at the end of that period.



Maureen O'Connor
Chief Justice

20JA1331

permanent
20CR99

COURT OF COMMON
PLEAS
UNION COUNTY, OHIO
2020 JUL 31 AM 8:38
Jenna S. Nichols
CLERK

IN THE COURT OF COMMON PLEAS, UNION COUNTY, OHIO
CRIMINAL DIVISION

STATE OF OHIO,

Plaintiff,

CASE NO.: 20 CR 0099

vs.

STEFFEN BALDWIN,

Defendant.

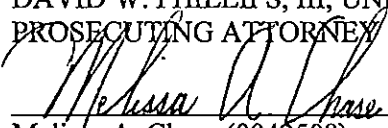
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UNION COUNTY, OHIO
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Diana D. Nichols
CLERK

STATE OF OHIO'S MEMORANDUM IN OPPOSITION TO DEFENDANT'S
MOTION TO REMOVE WARRANT OR REDUCE BOND

NOW come the State of Ohio, by and through the undersigned legal counsel, and, for the reasons set forth in the Memorandum in Opposition, respectfully requests the Court deny the Defendant's motion asking to remove the warrant and to allow the Defendant to appear before this Court upon his own and at a time convenient to the Court, the parties and the lawyers.

Respectfully Submitted,

DAVID W. PHILLIPS, III, UNION COUNTY
PROSECUTING ATTORNEY


Melissa A. Chase (0042508)
Assistant Prosecuting Attorney
249 West Fifth Street
Marysville, Ohio 43040
Telephone No.: (937) 645-4190
Facsimile No.: (937) 645-4191
Email: mchase@co.union.oh.us

MEMORANDUM IN OPPOSITION

Defendant is a flight risk because he has previously proven that he will leave in response to an ongoing criminal investigation. His warrant should not be removed, nor his bond reduced. The Defendant argues that Steffen Baldwin is a 39-year-old veteran of the United State military with no prior criminal

record and that he has made no attempts to flee or conceal his identity as evidenced from the State's ability to use Mr. Baldwin's residence address on his indictment and court filings.

Defendant's military record is not as he suggests. Defendant left the State of Ohio knowing that a criminal investigation was underway.

The investigation of this case began in June 2017. During the investigation, law enforcement officer obtained emails, text messages and Facebook posts of the Defendant. In his social media accounts, the Defendant stated that he would not leave Ohio for approximately ten years, when his son graduated from high school. However, the Defendant formed the plan to leave Ohio in late November 2017, ahead of the personal schedule he had described in his social media after learning of the police investigation into his criminal activities.

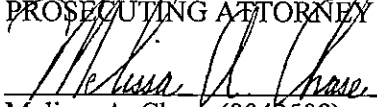
Reviewing his social media communications, text messages and emails, the Defendant knew an investigation of his activities was ongoing in the latter part of 2017. He was told by several individuals that they had been interviewed by law enforcement officers. In his social media accounts, the Defendant made threats to harm the investigating officer, describing how "stressed out, nauseous and angry" he was about the investigation. The Defendant searched the Internet for information on including "first time offender 3rd degree felony," "nonprofit fraud penalties in Ohio," and "theft by deception," among other topics which demonstrate his knowledge about the pending investigation.

The Defendant moved up the date upon which he was moving to California by five days to February 8, 2018 as well. The Defendant's leased residence in California was not ready to be occupied until February 15, 2018; however, he rented a moving van and was packing his belongings on February 7, 2018. Because of the Defendant's actions, the law enforcement officers had to move up the date for the execution of the search warrant on the Defendant's residence to February 7, 2018. Law enforcement officers had to search for the Defendant's property in the moving van he was using to leave Ohio and move to California. These factors indicate the Defendant knew about the investigation and intended to flee the State of Ohio while the investigation was continuing. The gravity or seriousness of the charges in this case provides even more impetus for the Defendant to be a flight risk.

The State opposes his motion for the warrant to be removed and for the Court to allow the Defendant to appear before the Court upon his own violation and asks the Court to overrule it.

Respectfully Submitted,

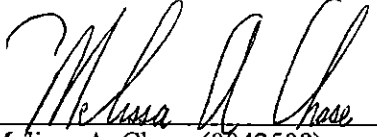
DAVID W. PHILLIPS, III, UNION COUNTY
PROSECUTING ATTORNEY



Melissa A. Chase (0042508)
Assistant Prosecuting Attorney
249 West Fifth Street
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Facsimile No.: (937) 645-4191
Email: mchase@co.union.oh.us

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Memorandum in Opposition was served upon Michael J. Streng, Attorney for the Defendant, *Bridges, Jilisky, Streng, Wller & Gullifer, LLC*, 302 South Main Street, Marysville, Ohio 43040, via email at mstreng@cfbjs.com, and by ordinary U.S. Mail, postage prepaid, this 3rd day of August 2020.



Melissa A. Chase (0042508)
Assistant Prosecuting Attorney