

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

STATE OF OHIO,

Plaintiff,

CASE NO.: 20 CR 0099

vs.

STEFFEN BALDWIN,

Defendant.

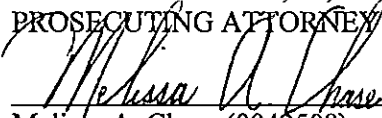
COURT OF COMMON
PLEAS
UNION COUNTY, OHIO
2020 AUG -3 AM 11:46
Diana D. Nichols
CLERK

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
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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.

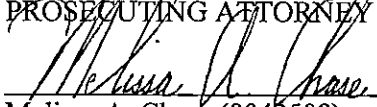
Reviewing his social media communications, text messages and emails, the Defendant knew an investigation of his activities was ongoing in the latter part of 2017. He was told by several individuals that they had been interviewed by law enforcement officers. In his social media accounts, the Defendant 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,

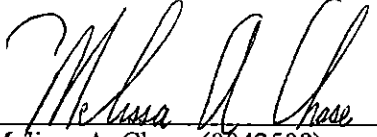
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CERTIFICATE OF SERVICE

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