



**STATE'S OPPOSITION TO DEFENDANT'S MOTION TO LIFT PROBATION
HOLD OR SET PROBATION BOND**

NOW INTO COURT, through the undersigned Assistant District Attorney, comes the State of Louisiana, and respectfully requests that this Honorable Court deny the defendant's motion to reduce bond, based upon the following jurisprudence and argument:

I. FACTS AND PROCEDURAL HISTORY

The defendant is charged with Theft Under \$1000. The defendant is on probation in Section I for case number [REDACTED] where he plead guilty to Possession with the Intent to Distribute Heroin. During that case, he failed to appear twice. While on probation, the defendant was arrested for new charges represented in the instant case. On January 8, 2019 Agent [REDACTED] Filed a Motion to Revoke the Defendant's probation. On March 16, 2020, the defendant filed a motion to reduce bond, citing the recent outbreak of COVID-19, also known as the Coronavirus. The State's opposition follows.

II. LAW AND ARGUMENT

The defendant has failed to provide any medical documentation in support of his argument that he will be at risk of contracting Coronavirus in the Orleans Justice Center. For the reasons set forth below, the defendant's motion to reduce bond should be denied.

I. The defendant has failed to show that the Orleans Justice Center is not adequately equipped to handle the Coronavirus outbreak, nor has he shown that he will be medically at risk of contracting the Coronavirus if he remains incarcerated.

The defendant has filed a boilerplate motion arguing that his bond should be reduced due to the Coronavirus outbreak. However, he has failed to provide any specific facts in support of this argument. The defendant has failed to show that the Orleans Justice Center is not taking all necessary precautions to prevent the spread of Coronavirus to its inmates. Moreover, the defendant has not provided any medical documentation that shows that he is immunocompromised or otherwise has an increased susceptibility to contracting the Coronavirus. The defendant's bond has previously been set after consideration of a large number of factors, including the facts of his case, the seriousness of the offense, his prior criminal record, potential danger to the community and flight