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2 CAUSE NO. 22-1-03537-1 SEA

3 PROSECUTING ATTORNEY CASE SUMMARY AND REQUEST FOR BAIL AND/OR  
4 CONDITIONS OF RELEASE

5 The State incorporates by reference the Certification for Determination of Probable  
6 Cause prepared by Detective Alan George Cruise of the Seattle Police Department for case  
7 number 2022-002037.

8 Pursuant to CrR 2.2(b)(2)(ii), the State requests that bail be set at \$30,000, as was set at  
9 the probable cause hearing, based on the likelihood that the defendant may commit a violent  
10 offense. The defendant has three juvenile felony convictions, for robbery 2<sup>nd</sup> degree (2004),  
11 attempted robbery 1<sup>st</sup> degree (2005) and VUCSA delivery of cocaine (2007). He has an adult  
12 felony conviction for conspiracy to deliver (2008), He also has a misdemeanor conviction for  
13 theft 3<sup>rd</sup> (2007).

14 The State is concerned the defendant may commit another violent offense. The defendant  
15 and the victim were in the same convenience store, when the defendant somehow came to the  
16 conclusion that the victim had disrespected him though he was simply standing in line. The  
17 defendant intentionally bumped the victim and when the victim confronted him about it, the  
18 defendant struck him and knocked him to the ground. The victim, in falling, suffered a fracture  
19 to his fibula. Once the victim was on the ground, the defendant shoved him down again as he  
20 tried to get up. This attack was unprovoked and senseless. The State is concerned the defendant  
21 may engage in another act of violence without provocation. The State requests bail be set in the  
22 amount of \$30,000.

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2 Signed and dated by me this 31st day of May, 2022.  
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6 Brynn N. H. Jacobson, WSBA #47820  
7 Senior Deputy Prosecuting Attorney  
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