

STATE OF INDIANA )	IN THE CARROLL CIRCUIT COURT
)SS:	
COUNTY OF CARROLL)	CAUSE NO.08C01-2210-MR-000001
)	
STATE OF INDIANA )	
)	
v. )	
)	
RICHARD M ALLEN )	

**PETITION TO LET TO BAIL**

Comes now the Accused, by counsel, and (pursuant to Article 1 Section 17 of the Constitution of the State of Indiana, Indiana Code § 35-33-8-2 and Fry v State, 990 N.E.2d 429 (Ind. 2013)) respectfully moves this Court to conduct a hearing and then release the Accused on his own recognizance, or in the alternative to set a reasonable bail. In support of his petition the Accused avers the following:

1. That the Accused, Richard Allen, was arrested and charged with murder, on or about October 28, 2022.
2. That the defense has received and reviewed the probable cause affidavit that, as of the time of the filing of this motion, has been sealed.
3. That because neither the proof of guilt is evident, nor the presumption of guilt strong, the Accused is seeking a hearing to release the Accused on his own recognizance or in the alternative to set a reasonable bail.

WHEREFORE, the Accused, by counsel, respectfully prays that the Court release the Accused on his own recognizance or in the alternative to set a reasonable bail.

Respectfully submitted,

*/s/ Andrew Baldwin*

Andrew Baldwin, Atty. No.17851-41  
Counsel for Accused  
BALDWIN PERRY & KAMISH, P.C.  
150 N. Main St.  
Franklin, Indiana 46131  
317-736-0053

**CERTIFICATE OF SERVICE**

This is to certify a copy of the foregoing pleading has been provided to all counsel of record for the opposing party, via IEFS this same day of filing.

*/s/ Andrew Baldwin*

BALDWIN PERRY & KAMISH, P.C.