

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED
JAN 15 2013
SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

STATE OF OKLAHOMA,)
Plaintiff,)
vs.)
FREDDIE ALLEN HAYES)
Defendant.)

Case No. CF-2013-214

MOTION FOR BOND INCREASE

The Defendant is charged with Possession of a Controlled Drug (Cocaine/Methamphetamine) as well as Carrying a Concealed Weapon. At the time of his arrest, he also had warrants for Failure to Pay and Trespassing.

The facts of the case, based on reports from the Tulsa Police Department, indicate police stopped the Defendant to question him regarding a citizen complaint of a "suspicious" person who was reportedly intoxicated and walking around vehicles parking in the street. When police arrived, the Defendant fit the description given to police and he gave officers consent to search, reports indicate. The police officer finds drugs in his wallet and brass knuckles in his pocket. He subsequently is booked in on an \$11,000 bond.

The State of Oklahoma requests a bond increase because it believes this Defendant is a potential public safety risk, as well as the possibility he may flee the jurisdiction if released. At least two factors support the State's concerns.

First, on January 7, 2013, a quadruple homicide took place in the 5800 block of South Owasso Ave where four women were killed. As a part of that investigation, this Defendant has been identified as, at a minimum, a witness in those homicides. The investigation also has discovered evidence that points

to the Defendant is a "person of interest" in the four killings. Given the nature of the crimes, the State argues that the Defendant is a potential public safety risk to the community as well as a risk to flee the jurisdiction should he be released.

The second factor justifying a bond increase is the Defendant's past criminal history. His NCIC indicates a lengthy criminal history that includes armed robbery, manufacturing, possession of drugs, aggravated battery and child endangerment in the State of Louisiana. The dispositions regarding the above arrest are being investigated, although the NCIC shows multiple convictions for this Defendant from the State of Louisiana.¹

The State would request this Court increase the Defendant's bond to be increased to \$250,000. If the Defendant should make whatever bond the Court sets, the State would request the Defendant be ordered to wear an ankle monitor and not be allowed to leave Tulsa County.

Respectfully submitted,

TIM HARRIS, DISTRICT ATTORNEY

By: 

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¹ The information on the Arrest and Booking report indicates that the Defendant is unemployed and, at this writing, the State is unsure as to what family ties he has to Tulsa.