

STATE OF INDIANA) IN THE SULLIVAN CIRCUIT COURT
) SS:
COUNTY OF SULLIVAN) CAUSE NUMBER: 77C01-0906-FC- 00049

STATE OF INDIANA

vs.

JONATHAN CHRISTOPHER
REEVES A/K/A CHRIS REEVES

FILED
IN CIRCUIT COURT

JUN 30 2009

Stephanie Davis
Clerk Sullivan Circuit Court

**STATE'S MOTION FOR GREATER THAN STANDARD BOND
AND FORFEITURE OF PASSPORT**

The State of Indiana, by its Prosecuting Attorney, Robert E. Hunley II, pursuant to Indiana Code 35-33-8-4, hereby files its Motion for Greater than Standard Bond, and in support of its motion submits the following:

1. Pursuant to the Sullivan County bond schedule, standard bond for a class C Felony is \$15,000.
2. The standard bond is inadequate, as it neither reflects the severity of this crime, nor does it insure the defendant's appearance in court.
3. This Court is required to order bail in an amount "amount reasonably required to assure the defendant's appearance in court..." Ind. Code §35-33-8-4(b)
4. When setting the amount of bail, the Court "shall take into account all facts relevant to the risk of nonappearance." Ind. Code §35-33-8-4(b).
5. The following factors are relevant in the instant case:
 - a. "The length and character of the defendant's residence in the community." Ind. Code §35-33-8-4(b)(1).
 - b. "The defendant's family ties and relationships." Ind. Code §35-33-8-4(b)(3).
 - c. "The defendant's character, reputation, habits, and mental condition." Ind. Code §35-33-8-4(b)(4).
 - d. "The nature and gravity of the offense and the potential penalty faced, insofar as it affects the risk of nonappearance." Ind. Code §35-33-8-4(b)(7).
 - e. "Any other factors, including any evidence of instability and a disdain for authority, which might indicate that the defendant might not recognize and adhere to the

authority of the court to bring him to trial.” Ind. Code §35-33-8-4(b)(9).

6. In the current offense, approximately 11,000 bondholders were allegedly defrauded, as a result of Alanar’s fraudulent business activities.

7. This case has received a high level of attention from the public.

8. According to the affidavit of probable cause filed in this case, the Reeves defendants are alleged to have received over \$6 million in ill-gotten gains as a result of their fraudulent activities.

9. Chris Reeves and his wife currently live in Louisville, Kentucky. They left the jurisdiction and moved away from Sullivan, Indiana after the U.S. District Court for the Southern District of Indiana ordered an injunction against Alanar in July 2005.

10. All of Chris Reeves’ family members have also moved out of Sullivan, Indiana.

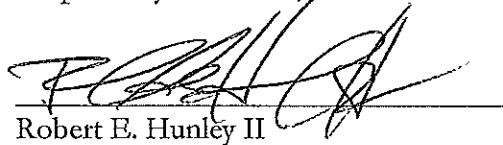
11. The defendant’s reputation in Sullivan has been harmed because of the receivership action.

12. The defendant faces 10 counts of Securities Fraud as class C felonies, which carry the potential of an 80-year sentence.

13. The defendant has been known to travel outside of the United States. The State respectfully requests that the Court require that the Defendant forfeit his passport as a condition of any bond.

14. The State of Indiana respectfully requests that the Court order bond in the amount of \$150,000 for each count with which the defendant is charged, for a total bond of \$1.5 million. The State further requests that the Court set the bond as cash rather than surety.

Respectfully submitted,



Robert E. Hunley II
Sullivan County Prosecuting Attorney