

THE STATE OF TEXAS

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IN THE 497TH DISTRICT COURT

VS.

OF

GILLEY, LEE MONGERSON

HARRIS COUNTY, TEXAS

MOTION FOR SUFFICIENT BAIL

THE STATE OF TEXAS, by and through its Assistant District Attorney, requests this Court enter a sufficient bail pursuant to Tex. Code Crim. Proc. Ann. Arts. 17.09(3), 17.15. Sufficient and non-oppressive bail is required to give proper consideration to the nature of the offense, protect the safety of the victim and community, and provide reasonable assurance that the defendant will return. The nature of the case reflects:



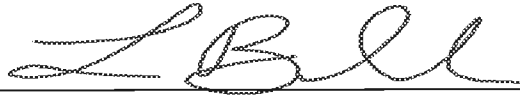
Aggravating facts specific to the nature of the case: The Defendant is accused of the capital murder of his wife and unborn child in the family home while the couple's two young children were also in the home. In the commission of the strangulation capital murder, the Defendant caused significant trauma to the face of the Complainant, including two black eyes, petechial hemorrhaging to the eyelids and chin, redness to the sclera and bulging eyes, visible discoloration and swelling to eyes and cheeks, extensive hemorrhaging to the muscle tissue in her upper back between her shoulder blades, and fracture of the hyoid bone. Under Texas Code of Criminal Procedure Article 17.15, the nature of the offense and the circumstances under which the offense was committed are to be considered, as should the future safety to the community, which includes the Complainant's two young children.

The Defendant also has significant ties out of state and sufficient means to flee the jurisdiction.

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR

THE STATE OF TEXAS prays that the Court will enter a sufficient and non-oppressive
bond of: \$3,000,000

RESPECTFULLY SUBMITTED,



BONDURANT, LINDSEY

Assistant District Attorney

Harris County District Attorney's Office

TBC No. 24086498

BONDURANT_LINDSEY@DAO.HCTX.NET

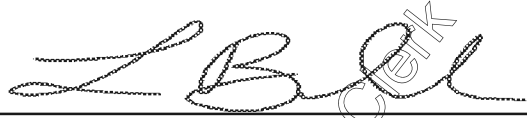
LUNASHARK MEDIA: EMPOWERING
VICTIMS' VOICES THROUGH FOIA

COURTESY OF
LUNASHARK MEDIA
Unofficial Copy Office of Marilyn Burgess District Clerk

COURTESY OF AN ANONYMOUS FOIA
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CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that a true and correct copy of this instrument was e-mailed to counsel for the Defendant on this date by electronic service using his State Bar of Texas official address for electronic service.



BONDURANT, LINDSEY
Assistant District Attorney
Harris County District Attorney's Office
TBC No. 24086498

LUNASHARK MEDIA: EMPOWERING
VICTIMS' VOICES THROUGH FOIA

COURTESY OF
LUNASHARK MEDIA
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COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR

CAUSE NO. 188871201010

THE STATE OF TEXAS

VS.

GILLEY, LEE MONGERSON

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IN THE 497TH DISTRICT COURT

OF

HARRIS COUNTY, TEXAS

ORDER

Having considered the State's Motion for Sufficient Bail, the State's request for \$3,000,000 bail is:

GRANTED

SIGNED AND ENTERED on .

Judge Presiding
Harris County, Texas

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR