

**IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, CRIMINAL DIVISION**

PEOPLE OF STATE OF ILLINOIS)	Case No. 08CR10502	FILED AUG 31 2011 DOROTHY BROWN CLERK OF CIRCUIT COURT
Plaintiff)	Case No. 10CR080902	
v.)	Judge Steven Goebel	
ANNABEL K. MELONGO)		
Defendant)		

MOTION TO APPOINT STANDBY COUNSEL OR TO MANDATE HOUSE ARREST

NOW COMES Annabel Melongo, Pro Se, to respectfully ask this Honorable Court to appoint standby counsel for her, or in the first alternative to mandate house arrest, or in the second alternative to release her on recognizance bond. In support of this motion, Defendant states as follows:

1. Defendant has been incarcerated at Cook County Jail since April 14, 2010, and has elected to represent herself pro se in said proceedings. In order to mount a strong defense, Defendant would need to do legal research, prepare and file motions, respond to prosecution motions, and conduct her trial. Defendant's current condition as a detainee greatly limits the extent to which she can perform these essential activities. As such, Defendant respectfully asks this Court to appoint standby counsel to consult with her regarding court rules and procedures and to assist her with the preparation of her defense.

2. In the first alternative, Defendant requests a court order for house arrest so that she could attend the law library as frequently as necessary for her to research, write, type and file her own motions. House arrest would give the defendant the ability to work on her case and defend herself without any need for standby counsel.

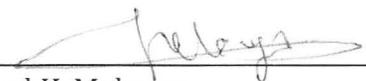
3. In the second alternative, Defendant respectfully calls to the attention of the Court that she has already been incarcerated approximately as long as the maximum sentence if she were to be found guilty of the charges of which she was accused. Fundamental fairness and due process of law prohibit the Court from detaining Defendant longer than the maximum sentence associated with the charges. The Court must also take notice of the fact that Defendant is eligible for probation without any incarceration, if found guilty.

4. Refusal and failure of this Court to appoint standby counsel, to mandate Defendant to house arrest, or to release Defendant on her own recognizance would constitute a denial of due process, would greatly impair preparation of a strong defense, and would deprive her of a fair trial as guaranteed by United States and Illinois constitutions and statutes.

WHEREFORE, Defendant prays for the relief requested.

Date: August 31, 2011

Respectfully submitted,



Annabel K. Melongo

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