

Eavesdropping constituted a violation of her bond, which stated that she could not get charged with any other offenses while out on the I Bond granted in the Computer Tampering case.

5. The total bonds set in the above cases are 500,000 D and 30,000 D bond meaning that Ms. MELONGO must come up with \$53,000 to get out of prison on a non-violent offense where no pecuniary interests were harmed.

6. The Eighth Amendment to the United States Constitution and Article 1 Section 9 of the Illinois Constitution provide that excessive bail shall not be required. U.S. Const., Am. VIII; ILCS Const. Art. 1 Sec. 9.

7. Bail that is set at an amount higher than an amount reasonably calculated to give adequate assurance that the accused will stand trial and submit to sentence if guilty is excessive under the Eighth Amendment. See Stack v. Boyle, 342 U.S. 1, 5, (1951).

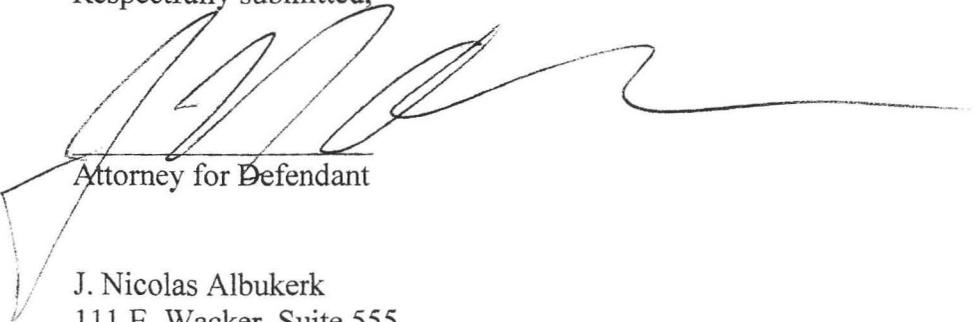
8. Reduction of ANNABEL MELONGO's bail is appropriate because:
- a. ANNABEL MELONGO's ties to the community are well established and she has attended every Court date since being arrested, four years worth of Court dates.
 - b. The new offense for which she has been charged is a Felony in only four States, meaning that few jurisdictions see Ms. Melongo's activity of recording a conversation as criminal.
 - c. The offense of Eavesdropping is not a violent crime or one in which anyone's interests were negatively effected. In fact a full

reading of the Statute strongly implies that the only reason for the Statute is political.

- d. The Defendant, ANNABEL MELONGO, has no Felony criminal convictions.

For the foregoing reasons, ANNABEL MELONGO respectfully requests that the Court grant her motion for bail reduction to a reasonable amount no more than a 100,000 "D" bond.

Respectfully submitted,



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