

IN THE IOWA DISTRICT COURT IN AND FOR LEE (SOUTH) COUNTY


STATE OF IOWA,)	
)	
Plaintiff,)	
)	
vs.)	Cause No. FECR009152
)	
BENJAMIN G. TRANE,)	APPLICATION FOR FURLOUGH
)	FROM PRE-TRIAL SUPERVISION
Defendant.)	

COMES NOW, the defendant, by and through his attorney, Lisa K. Schaefer, Robberts & Kirkman, L.L.L.P., 706 Jefferson Street, Burlington, Iowa 52601, pursuant to Iowa Code §811.2(7)(a) and requests the Court review the conditions of his release for the reasons set forth below:

1. The defendant is currently on pre-trial release with supervision, after posting bond. One of the conditions of his release is that he not leave the State of Iowa.
2. The defendant resided in Ammon, Idaho prior to his arrest in Lee County. He turned himself in immediately upon learning of the arrest warrants while he was on family vacation in Utah.
3. He had no opportunity to retrieve any clothing, personal items or work-related items prior to returning to Iowa to face his charges.
4. The defendant requests a one-week furlough to return to his home in Ammon, Idaho to retrieve his personal and work-related items to have while he is living in Keokuk, Iowa during the pendency of this case.
5. It is anticipated that the State will resist this request and the defendant further requests

the matter be set for hearing.

WHEREFORE, for the reasons set forth above the defendant respectfully requests the Court that grant hearing on the defendant's request for a one-week furlough to leave the State of Iowa



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