

FILED
01-23-2024
Clerk of Circuit Court
Kenosha County
2018CF000643

STATE OF WISCONSIN	CIRCUIT COURT	KENOSHA COUNTY
STATE OF WISCONSIN Plaintiff,	DA Case No.: 2018KN003329	
vs.	Court Case No.: 2018CF000643	
CHRYSTUL D. KIZER DOB: 07/02/2000 Defendant.	MOTION TO MODIFY BOND	
	Hon. David P. Wilk	

For Official Use

The State of Wisconsin, by the undersigned Assistant District Attorney, pursuant to Section 969.08(1), Wis. Stats., hereby moves this Court to modify the bond of defendant Chrystul Kizer to its original \$1,000,000 cash total, and in support thereof, offers the following:

1. The defendant is presently charged with first degree intentional homicide, operating a motor vehicle without owner's consent, arson of a building, possession of firearm by a convicted felon and felony bail jumping in the above file.
2. The defendant appeared before Commissioner Mason in the above case on June 13, 2018, where bond was set at a total of \$1,000,000 cash, with the condition that the defendant commit no additional crimes.
3. On February 6, 2020, the defendant appeared before Judge Wilk, where the above bond was reduced to \$400,000 cash with the condition that the defendant commit no additional crimes
4. The defendant posted the \$400,000 cash bond, with the condition that the defendant commit no additional crimes, on June 23, 2020.
5. On January 7, 2024, the defendant had contact with Milwaukee Police Department officers and was arrested for domestic abuse offenses.
6. The defendant was charged by complaint and warrant in Kenosha County Circuit Court case number 24CF100, where the defendant was charged with four counts of bail jumping, with three counts being for committing new crimes, and one count for changing her address without notice to the court.

7. The defendant has also been charged with disorderly conduct in Milwaukee County Circuit Court file number 24CM210 related to the same January 7 incident.
8. A court may “[i]mpose bail following a finding under s. 969.01(1)(b) or any nonmonetary condition deemed reasonably necessary to secure the appearance in court as required, protect members of the community from serious harm.” Wis. Stat. § 969.03(1)(e).
9. The defendant’s actions cause concern for both the appearance of the defendant in court, as well as protection of members of the community from serious harm, as the defendant is alleged to have engaged in additional acts of violence subsequent to her release from custody.

For the above reasons, the state respectfully requests this honorable court modify bond to increase the amount back to the original amount of \$1,000,000 cash.

Dated this 23rd day of January, 2024.

Date Signed: 01/23/24

Electronically Signed By:

Zachary L Brost

Assistant District Attorney

State Bar #: 1105364