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EKYBROADCASTINGCOMMONWEALTH OF KENTUCKY
PIKE CIRCUIT COURT
CASE NO. 25-CR-225

COMMONWEALTH OF KENTUCKY

PLAINTIFF

VS.

MICHAEL K. MCKINNEY, II

DEFENDANT

MOTION TO MODIFY BOND CONDITIONS

Comes, Defendant, Micheal K. McKinney, II, through counsel, and respectfully requests this Honorable Court to modify Defendant's bond conditions to release him from home incarceration and electronic monitoring. In support thereof, he states as follows:

1. Mr. McKinney is currently subject to a \$250,000 full cash bond with the conditions of HIC and GPS monitoring. Since that bond was posted on July 31, 2024, Mr. McKinney has not committed any violations, abided all orders of this Court, and attended all court appearances.

2. At the most recent pretrial conference on December 1, 2025, the Court set a trial date of May 11, 2026. Additionally, the Court ordered that felony mediation take place prior to that trial date. As the Court is aware, both a felony trial and mediation take substantial preparation. The current restrictive conditions significantly impede Mr. McKinney's ability to meet with counsel, gather evidence, and participate meaningfully in trial preparations. Maintaining the substantial cash bond alone sufficiently assures his appearance at trial while respecting his constitutional right to prepare an adequate defense.

3. Both defense counsel and the Commonwealth agree that a hearing on the matter is not necessary, and the Court may rule on the pleadings. Should the Court require a hearing, defense counsel would request that it occur via Zoom.

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WHEREFORE, Defendant respectfully requests that this Honorable Court modify the bond conditions to release him from home incarceration and electronic monitoring, and for all other relief to which he may be entitled.

Respectfully submitted,

/s/Terry D. Jacobs
TERRY D. JACOBS
ATTORNEY AT LAW
P.O. Box 991
Hindman, KY 41822

NOTICE

The foregoing Motion shall be heard at the convenience of the Court.

CERTIFICATE OF SERVICE

Undersigned certifies that a true and accurate copy of the foregoing Motion was served upon all parties via electronic mail and through the AOC eFile system on this the 4th day of December 2025.

/s/Terry D. Jacobs
TERRY D. JACOBS
ATTORNEY AT LAW
P.O. Box 991
Hindman, KY 41822