

STATE OF MICHIGAN
IN THE WASHTENAW COUNTY TRIAL COURT

THE PEOPLE OF THE STATE OF MICHIGAN,

Case No. 21FB-1656

Plaintiff,

HON.

-v-

RYAN CUONG LE-NGUYEN,

Defendant.

ELI N. SAVIT (P76528)
Washtenaw County Prosecuting Attorney
Attorney for Plaintiff
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P.O. Box 8645
Ann Arbor, MI 48107
(734) 222-6620

JOSEPH A. SIMON (P39156)
LAW OFFICES OF JOSEPH A. SIMON
Attorney for Defendant
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Ste. 11
Ann Arbor, MI 48104
(734) 887-6200

**PEOPLE'S MOTION FOR IMMEDIATE CONSIDERATION OF THEIR MOTION TO
REVOKE BOND**

COMES NOW Eli N. Savit, Washtenaw County Prosecuting Attorney, brings its Motion for Immediate Consideration of its Emergency Motion to Vacate Bond pursuant to MCR 6.106(H), and states as follows:

1. Defendant is charged with 4 felonies: Assault with Intent to Murder, contrary to MCL 750.83; Assault with Intent to do Great Bodily Harm, contrary to MCL 750.84; Weapons-Firearms-Discharge in or at a Building, contrary to MCL 750.234b(2); and Weapons-Firearms-Discharge in or at a Building Causing Injury, contrary to MCL 750.234b(3).

2. Plaintiff filed its Emergency Motion to Revoke Bond to this Court on June 8, 2021, pursuant to MCR 6.106(H). Plaintiff argued that the district court abused its discretion in its pretrial bond decision and requested that this Court vacate that bond condition, issue an immediate warrant for Defendant, and schedule a bond hearing.
3. The Plaintiff incorporates by reference all allegations in its Emergency Motion to Revoke Bond herein.
4. Plaintiff argued in its motion that the magistrate failed to properly consider several factors in its bond pretrial release decision, as required by MCR 6.106(F)(1). As the court failed to properly and adequately consider these factors, it was an abuse of discretion for the court to order this release. This resulted in bond release conditions that do not reasonably ensure public safety. See MCR 6.106(D).
5. It is necessary for this Court to consider the Motion to Revoke Bond on an emergent basis because of the high risk and danger to the victim named in the Complaint, to other children from the neighborhood who were involved, and to the public as a whole.
6. Plaintiff requests that this honorable Court immediately consider and decide its Emergency Motion to Revoke Bond.

Therefore, Plaintiff-Appellant requests that this Honorable Court grant immediate consideration to its Emergency Motion to Vacate Bond.

Respectfully submitted,

Eli N. Savit (P76528)
Washtenaw County Prosecuting Attorney

By: /s/ Patricia A. Reiser
Patricia A. Reiser (P52153)
First Assistant Prosecuting Attorney

Dated: June 9, 2021

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on 6/9/21

By: U.S. Mail Hand Delivered

Fax Interoffice Email

Signature: /s/ Patricia A. Reiser