

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF RAMSEY

FOURTH JUDICIAL DISTRICT

State of Minnesota,

Court File No.: 27-CR-22-19036

Plaintiff,

vs.

**AFFIDAVIT OF
BERNICE B. HODGE**

Crystal Latasha Mcbounds,

Defendant.

IN RE: The Application of Minnesota Freedom Fund

I, Bernice B. Hodge, being first duly sworn upon oath, state and depose to the Court as follows:

1. I am the staff attorney for the Minnesota Freedom Fund ("MFF"), licensed to practice in the State of Minnesota (Attorney License #0402567).
2. On October 12, 2022, Ms. Crystal Mcbounds ("Ms. Mcbounds") signed Form CRM602, Assignment of Bail to a Third Party, requesting that any refunded bail money be returned to MFF.
3. On October 14, 2022, MFF posted cash bail in the amount of \$5,000.00 on behalf of the above-named Defendant, Ms. Mcbounds.
4. On April 25, 2023, Ms. Mcbounds failed to appear for a court hearing. Judge Borer ordered forfeiture of the \$5,000 cash bail and issued a bench warrant.

5. However, after Judge Borer ordered forfeiture, there was neither written notice of the order of forfeiture nor a written notation that MFF was notified by the court administrator.
6. On May 1, 2023, Ms. Mcbounds was arrested and the bench warrant was cleared.
7. On May 2, 2023, Ms. Mcbounds appeared for an in-person hearing at the Hennepin County Public Safety Facility. At that time, Judge Allyn ordered a second forfeiture of the \$5,000 cash bail.
8. MFF has testimony and evidence to support the following facts:
 - a. After Ms. Mcbounds was released from pretrial custody, MFF's previous staff attorney spoke with her regarding the services MFF offers to help support individuals released on bail.
 - b. MFF's staff provided Ms. Mcbounds with court reminder calls in advance of the hearings scheduled in the above-captioned matter.
 - c. MFF closely tracks the hearing dates in every case in which our organization posts bail and takes multiple steps to facilitate the defendant's appearance for court, including attempting to contact the defendant after any failure to appear.
 - d. In this case, after Ms. Mcbounds failed to appear, a staff member from MFF's Post-Release Support Department emailed Ms. Mcbounds as well as left her a voicemail with her support contact.

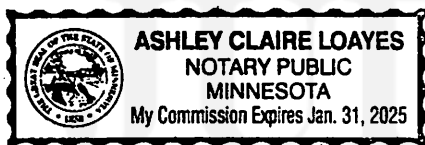
- e. MFF made thorough and good-faith efforts to contact Ms. Mcbounds, inform her that a bench warrant had been issued for her arrest, and provide additional information regarding MFF's post-release support services.
- f. On May 2, 2023, Ms. Mcbounds reappeared in court and an in-person hearing was held.
- g. Currently, Ms. Mcbounds case is pending with an upcoming hearing scheduled for December 19, 2023.

"I declare under penalty of perjury that everything I have stated in this document is true and correct." Minn. Stat. § 358.116.

Date: September 25, 2023

/s/ Bernice B. Hodge
Bernice Beatrice Hodge

Signed and dated in Hennepin County, Minnesota



[Signature] on 9/25/23