

STATE OF MINNESOTA  
COUNTY OF HENNEPIN

---

DISTRICT COURT  
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Court File No.: 27-CR-23-21653

Plaintiff,

vs.

**NOTICE OF MOTION AND  
MOTION TO MODIFY  
CONDITIONS OF RELEASE**

Robert William Balsimo,

Defendant.

---

TO: THE HONORABLE LISA K. JANZEN, JUDGE OF DISTRICT COURT; MARY F. MORIARTY, HENNEPIN COUNTY ATTORNEY; AND ISAIAH ELLISON, ASSISTANT HENNEPIN COUNTY ATTORNEY, C2100 GOVERNMENT CENTER, 300 SOUTH SIXTH STREET, MINNEAPOLIS, MN 55487.

**NOTICE OF MOTION AND MOTION TO MODIFY CONDITIONS OF RELEASE**

**PLEASE TAKE NOTICE** that as soon as counsel may be heard, Mr. Robert William Balsimo, by and through the below-signed attorney, will move this court for an order modifying his conditions of release.

Pursuant to Minn. R. Crim. P. 6.02, subd. 4,<sup>1</sup> “[t]he court must review conditions of release on request of any party.” Mr. Balsimo requests that the Court schedule an appearance for him to be heard on the conditions of his release.

Respectfully submitted,

LAW OFFICE OF THE HENNEPIN COUNTY  
PUBLIC DEFENDER  
FOURTH JUDICIAL DISTRICT

---

<sup>1</sup> When a criminal case is suspended pursuant to Minn. R. Crim. P. 20.01, the Court still retains authority over the criminal case, including over bail and conditions of release. Minn. R. Crim. P. 20.01, subd. 3(c).

By:



Date: October 27, 2023

Raissa R. Carpenter (#0396413)  
Assistant Public Defender  
Hennepin County Public Defender's Office  
701 Fourth Avenue South, Suite 1400  
Minneapolis, MN 55415-1600  
Office: 612-348-9676  
Fax: (612) 348-6179  
Email: [raissa.carpenter@hennepin.us](mailto:raissa.carpenter@hennepin.us)



MINNESOTA  
JUDICIAL  
BRANCH