

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

State of Minnesota,

Court File No.: 27-CR-18-18391

Plaintiff,

vs.

**AFFIDAVIT OF
LARAE LATOURELLE**

Aesha Ibrahim Osman,

Defendant.

IN RE: The application of Bail Bonds Doctor, Inc.

LaRae LaTourelle, being first duly sworn oath, states and deposes to the court as follows:

1. I am an agent for Bail Bonds Doctor, Inc. (hereafter "BBD"). I have personal knowledge of the facts contained in this affidavit.
2. I have overseen and managed the bail bond FCS25-1875596 in the amount of \$20,000.00 (the "Bond") posted in this file. I have undertaken efforts related to the Bond and participated in efforts to reinstate the Bond when it was forfeited.
3. Currently, the Bond is forfeited due to a prior non-appearance of the defendant. However, the Court's Order dated March 5, 2019 (the "Order") stated that BBD may submit another petition for reinstatement once the matter has concluded.
4. BBD intends to submit another petition for reinstatement once the matter concludes. BBD is still monitoring the defendant's appearances and accepts responsibility for ensuring the defendant's appearance if any further failures to appear occur.
5. The Order required full payment of the Bond. Court Administration has stated that full payment is due by January 2, 2020 at 4:00 p.m. If BBD does not make timely payment, its ability to post bonds throughout the State of Minnesota will be suspended.

6. Payment of \$20,000.00 is a large amount for BBD. Such a payment would cause a significant financial hardship and would require transferring funds from other sources. BBD collected \$2,000.00 as its premium for the Bond, which was split between BBD, its surety, and the agent posting the Bond. \$18,000.00 of the penalty would be paid from other sources unrelated to the Bond. To date, BBD is unable to collect additional funds from the defendant or any other person related to the Bond.
7. BBD requests a stay of the penalty, a portion thereof, or the opportunity to post a supersedeas bond in lieu of full payment of the penalty. BBD believes that this request is justified for three reasons: (1) Full payment of the penalty will cause significant financial hardship; (2) BBD continues to accept responsibility for the defendant's appearances; and (3) BBD intends to petition the Court for reinstatement of the Bond once the matter has concluded. A stay will permit BBD to continue operations, including ensuring the defendant appears, and a stay will not prevent full payment of the penalty at the conclusion of this matter if such penalty is warranted.

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

Signed in Hennepin County, Minnesota.


LaRae LaTourelle

Dated: December 30, 2019