

Electronically filed

NO. 25-CR-00223

PIKE CIRCUIT COURT

CRIMINAL DIVISION

HON. JUDGE EDDY COLEMAN

COMMONWEALTH OF KENTUCKY

PLAINTIFF

V. **RENEWED MOTION TO REDUCE BOND**

MICHAEL K. MCKINNEY III

DEFENDANT

*** **

Comes now the Defendant, Michael K. McKinney III, by and through counsel, Steven R. Romines, and respectfully files this renewed motion to reduce the bond currently imposed on him in this case, and in support, states the following:

1. Over a year ago, the parties in this case argued the issue of bond, which was set at the amount of five-million dollars, full cash. The Defense's arguments involved the Defendant's total lack of criminal history, the total lack of any indication that he'd be a flight risk, the weakness of the evidence supposedly implicating the Defendant, and the glaring possibility that the victim was murdered by a particular alternate suspect. The Commonwealth argued that the Defendant was "cuckoo for cocoapuffs" and that DNA results made for a strong prosecutorial case. The Court noted both positions and ruled for the bond to remain the same, noting that the Commonwealth alleged "*that the DNA results and other evidence **now available** would support their indictment of the Defendant's guilt.*" (See attached order entered 10/28/24, Page 2, emphasis added).
2. Now that the case has been litigated, discovery has been provided, and a trial date has

been set, the Defense's position has not changed. Apparently, the Commonwealth's has. The Commonwealth now seeks a continuance of the scheduled trial date to gather more evidence. Compare this to the Commonwealth's argument regarding bond, which relied on "*evidence now available*" and not "*evidence that might become available at an unspecified future date.*" The Commonwealth's current attempt to back down from trial is a tacit admission that the evidence in this case is not as strong as once argued.

Meanwhile, MK remains a low risk of flight or danger with a right to pretrial release.

3. The Defense incorporates and restates the relevance of its previous motion to reduce the Defendant's bond. (See attached).

WHEREFORE, the Defendant respectfully requests the Court that his bond be reduced to an amount consistent with his criminal history and similarly situated Defendants, with whatever additional conditions or restrictions the Court deems appropriate.

Respectfully submitted,

ROMINES WEIS & YOUNG PSC

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CERTIFICATE

It is hereby certified that a copy of the foregoing was electronically filed this the 25th day of October, 2025.

/s/Steven R. Romines
STEVEN R. ROMINES