

IN THE CIRCUIT COURT OF ST. CHARLES COUNTY
STATE OF MISSOURI

STATE OF MISSOURI,)
)

Plaintiff,)

v.) Cause No.: 2311-CR04219

) Division: 9

VENKATESH SATTARU)

Defendant.)

**DEFENDANT VENKATESH SATTARU'S MOTION
TO AMEND THE CONDITIONS OF BOND**

COMES NOW Defendant Venkatesh Sattaru, by and through Counsel, and moves the Court amend the conditions of the bond herein pursuant to Section 544.455 R.S.Mo. In support of his Motion, Defendant Sattaru states and alleges as follows:

1. On his Pretrial Assessment Report, Mr. Sattaru had a total score of 1 and was deemed a "Very Low Risk". That is with good reason.
2. Venkatesh Sattaru is a 35-year-old man who was born in India but immigrated to the United States in 2008 and attained United States Citizenship in 2014.
3. Mr. Sattaru proudly served in the United States Army and was Honorably Discharged in 2014 after suffering lifelong debilitating injuries while in training.
4. He and his wife Nitya, also a naturalized citizen, were married in 2010 and have two children ages 6 and 2.
5. The marital home is in St. Charles County.
6. Mr. Sattaru graduated high school and received his Associates Degree from St. Charles Community College.
7. After leaving the Army, he started his own company, Keysoft,
8. Mr. Sattaru has no criminal history.

9. Contrary to what has been reported in the news, the complaining witness was anything but a captive in this country. He came here willingly to go to school at Missouri University of Science and Technology in Rolla, Missouri. Counsel has documents and photographs evidencing the fact that Mr. Sattaru helped the complaining witness come to this country, gave him a place to live, helped him attend Missouri University, and at his request, helped him transfer to St. Charles Community College.

10. The complaining witness could not afford to attend St. Charles Community College so Mr. Sattaru and his family assisted him with tuition.

11. In addition, the Sattaru family helped the complaining witness learn to drive, obtain his driving permit, purchase auto insurance, purchase health insurance and obtain all of his necessities, including food and clothing. Again, contrary to news reports, the complaining witness always had more than ample food.

12. On at least two separate occasions, the complaining witness had accidents while driving alone in the Sattaru's vehicles. On information and belief, the complaining witness left the scene of the second accident without notifying the owner of the other vehicle or alerting the police (despite being urged to do so by Mr. Sattaru).

13. On at least two occasions, the complaining witness was ticketed for traffic violations in St. Charles County, both while he was alone in one of the Sattaru vehicles. On one such occasion, the complaining witness refused to stop for the police and Mr. Sattaru had to persuade the police department to release him from custody.

14. Contrary to the Complaint herein, the complaining witness's passport is intact and in Defense Counsel's possession.

15. Counsel also has Mr. Sattaru's passport and is prepared to tender same to this Court should that be made a condition of bond.

16. There is no threat of non-appearance in this matter. Mr. Sattaru's family is here, in St. Charles County, and that is where he intends to stay. He has pled not guilty to each of the charges and looks forward to his day in court.

17. Mr. Sattaru suffers from a number of different health issues, all of which require treatment that is unavailable at the St. Charles County Justice Center.

18. Finally, there will be no contact or communication whatsoever with the complaining witness. Mr. Sattaru and his family want nothing to do with this young man. He no longer lives at their home and is not welcome there.

19. Should the Court require, Mr. Sattaru is prepared to be GPS monitored while on bond.

WHEREFORE, Defendant respectfully requests the bond herein be reduced to \$100,000.00 with ten percent authorized with special conditions to include submission of his United States Passport and for such other and further relief the Court deems meet in the premises.

Respectfully Submitted,
Moran & Goldstein, L.C.

By: */s/William Goldstein*
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CERTIFICATE OF SERVICE

Signature above is also certification that a true and correct copy of the above and foregoing document has been delivered electronically this 10th day of December, 2023, to: The Office of the Prosecuting Attorney for St. Louis County, State of Missouri.