

IN THE IOWA DISTRICT COURT FOR DALLAS COUNTY

<p>STATE OF IOWA Plaintiff,</p> <p>vs.</p> <p>KRISTIN RAMSEY, Defendant.</p>	<p>CRIMINAL NO. FECR051688</p> <p>STATE'S RESISTANCE TO DEFENDANT'S MOTION FOR BOND REDUCTION</p>
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NOW the State comes before the Court, through Dallas County Attorney Matt Schultz, Assistant Attorney General Scott Brown, and Assistant County Attorney Andrea Lovig, and in resistance to the Defendant's Motion for Bond Reduction states the following:

JUDICIAL NOTICE

1. The State requests the Court take Judicial Notice of the Minutes of Testimony supporting the Grand Jury Indictment which have been filed within the above captioned case.

PROCEDURAL HISTORY

1. On March 17, 2026, the Defendant was indicted by Grand Jury for Murder in the First Degree, a Class A Felony, in violation of Iowa Code Sections 707.1 and 707.2.

2. The Defendant was arrested the same day.

3. At the time the warrant was issued by the Court the bond amount was set in the amount of \$2,000,000. On March 18, 2026, the Defendant appeared for an initial appearance and the bond in the current amount was affirmed based on the circumstances known to the Court.

4. On March 19, 2026, the Defendant requested a bond reduction. The Defendant cites numerous cases which have no applicability to the Defendant's motion.

5. Hearing on the Defendant's motion is set for April 10, 2026.

**THE COURT HOLDS DISCRETION
TO DETERMINE THE APPROPRIATE AMOUNT OF BOND**

6. Judicial officers shall exercise discretion in establishing bond in accordance with the factors set forth in Iowa Code section 811.2(2). *State v. Huss*, 779 N.W.2d 495 (Iowa Ct. App. 2010). Iowa Code Section 811.2(2) states that a magistrate shall take into account, the nature and circumstances of the offense charged, the Defendant's family ties, employment, financial resources, character and mental condition, the length of the Defendant's residence in the community, the Defendant's record of convictions, including the Defendant's failure to pay any fine, surcharge or court costs and the Defendant's record of appearance at court proceedings or of flight to avoid prosecution or failure to appear to appear in court proceedings. Further, Iowa Code section 811.2 vests the determination of the appropriate form of bail in the discretion of the district court. The court's determination is guided by the necessity of "reasonably assur[ing] the appearance of the person for trial or deferral of judgment and [guaranteeing] the safety of other persons." Iowa Code § 811.2.

NATURE AND CIRCUMSTANCES

7. Defense counsel in a separate pleading has characterized the evidence before the grand jury as "minimally sufficient evidence to support an accusation to indict Ms. Ramsey on one count of Murder in the First Degree for a crime that happened 15 years ago". This characterization of the grand jury process placing emphasis on the supposed

level of evidence presented to the grand jury and the age of the investigation necessitates the following response from the State. The standard utilized by the grand jury was “when viewing the evidence, taken together, is such that, if unexplained, would warrant a conviction by the trial jury.” I.R.Cr.P. 2.3(6)(i).

8. The following facts and circumstances indicate no other person’s involvement in Ashley Okland’s murder other than the Defendant.

9. On April 8, 2011, Ashley Okland (Ms. Okland) was employed as a real estate agent at Iowa Realty. On that date and time, Ms. Okland was scheduled to work in the Stone Creek model home located at 558 Stone Creek Court in West Des Moines, Iowa from 1:00 pm to 6:00pm.

10. The model home located at 558 Stone Creek Court was owned by a development agency known as Rottlund Homes. Rottlund Homes utilized Iowa Realty realtors, such as Ms. Okland, to sell their homes. The Defendant was employed as a Sales Manager for Rottlund Homes.

11. For more details of the relationship of the Defendant and Ms. Okland the State refers the Court to the Grand Jury Minutes of Testimony.

12. Law enforcement learned that on April 8, 2011, shortly before 2:00 p.m. Okland sent an email from her computer to a friend regarding unrelated social plans which provided a basis to believe Ms. Okland was not in distress, was alive, and was physically present in the model townhome.

13. On the same date and time a witness and her mother were present in the townhome that shared a wall with the model home at 558 Stone Creek Court. Shortly after 2:00 p.m. the witness heard two loud noises coming from the model home that were

described as thuds that were 3-4 seconds apart. As described, the noises are believed by investigators to be gunshots. After hearing the noises the witness observed the Defendant outside the front door of the model home. Shortly after that the witness observed the Defendant from the second floor window of her home pacing by her vehicle on her cell phone. The call made on the Defendant's phone was made to a fellow employee of Rottlund Homes and was confirmed to have occurred within two minutes of the loud noises heard by the witness. The witness then observed the Defendant back up at a high rate of speed in an erratic manner and leave the area. Concerned that something was wrong, the witness entered the model home and discovered Ms. Okland unresponsive on the ground. This witness is the individual that called 911, not the Defendant. Shortly after she left the Defendant returned to the area of the townhome.

14. No other person was observed in the immediate area that was associated with the model home where Okland was shot. All doors and windows in the living area of the townhome were confirmed locked or latched. There was no furniture or other item in the model home where Ms. Okland was found that corresponded to the thuds described by the witness – meaning no overturned furniture, broken glass, or any other damage. There were no signs of any struggle.

15. Emergency Medical Services responded to the 911 medical emergency at the Stone Creek model home on April 8, 2011.

16. Law enforcement recovered two (2) fired .380 caliber cartridge cases that were consistent with being fired from a firearm.

17. To date, the Defendant has been interviewed on multiple occasions. The Defendant has provided conflicting versions of her whereabouts and other events occurring

on April 8, 2011. The Defendant's statements not only conflict with each other but also conflict with other witness statements. The Defendant's statements are detailed in the grand jury minutes and the State requests the Court consider those statements in determining the circumstances of this case.

18. An autopsy was conducted on April 10, 2011, by Polk County Medical Examiner, Dr. Gregory Schmunk. Dr. Schmunk determined the cause of death was multiple gunshot wounds and the manner of death was homicide.

19. It was determined that Ms. Okland was shot at close range once in the chest and once in the face.

FAMILY TIES AND RESIDENCE

20. Since the murder on April 8, 2011, the Defendant has maintained residence in Woodward, Iowa.

21. A search warrant was executed upon the Defendant's home on May 3, 2011. Law enforcement discovered several items of concern, including multiple firearms, illegal substances, and posters threatening violence.

22. A second search warrant was executed on the Defendant's home on March 17, 2026. Law enforcement located multiple firearms, illegal substances, and some of the same posters threatening violence.

23. Both instances that law enforcement entered the Defendant's home, she was multiple firearms and drugs were present. The Defendant does not have a safe and law-abiding home to return to.

EMPLOYMENT AND FINANCIAL RESOURCES

24. The Defendant filed a financial affidavit with the Court on March 18, 2026. The affidavit indicates that the Defendant is currently unemployed. The State is aware that the Defendant was employed until the time of her arrest. Throughout her motion for bond review, the Defendant asserts she is indigent. Given that private counsel has been retained, it appears that the Defendant does have access to substantial funds. The Defendant presents more of a flight risk since she has access to financial resources and now does not have the stability of a job.

CHARACTER AND MENTAL CONDITION

25. The Defendant suggest that the age of the investigation is a factor in her favor. The State argues to the contrary. Based upon the totality of circumstances known to the State, the Defendant has not been held accountable for her actions for fifteen years.

26. To date, the Defendant has provided multiple accounts of what occurred the day of Ms. Okland's death. It is clear to the State that a person who is capable of engaging in these acts and evading consequences for a long period of time is not a safe in the community.

27. Additionally, the state has concern for the mental condition of the Defendant. The Defendant's life circumstances have changed in a drastic way. She is now facing life imprisonment. It is unknown how this factor will affect the Defendant's mental health. The State is concerned the Defendant would pose a danger to herself if released. It is clear that the Defendant has access to multiple firearms which could be a danger to her or others. No amount of assurance will should be able to satisfy the Court that the Defendant would remain away from firearms if she were released under any conditions.

INFORMATIVE OTHER MURDER CASES

28. In 2022, Dallas County prosecuted Defendant Nathan Cameron in Dallas County case number FECR045553. Mr. Cameron was charged with First Degree Murder. The Court set bond at one million dollars, cash only. The Defendant requested the bond amount be lowered, the court declined the lower the bond.

29. In 2023, Dallas County prosecuted Defendant Yemissi Keto in Dallas County case number FECR047638. Ms. Keto was charged with First Degree Murder. Bond was set at one million cash only for the entirety of the case.

30. In Harrison County Case Number FECR014930, State of Iowa vs. Robert Allen Davis, the Defendant was recently convicted of Murder in the Second Degree. The murder was committed in May of 1989. Pending trial for nearly one year Mr. Davis was ordered to post a bond in the amount of 3 million dollars in order to be released.

COVID CASE (EXCEPTION TO NORMAL)

31. *State v. Gowun Park*, Dallas County Case Number FECR042670 a bond review hearing occurred at the height of the Covid-19 national pandemic. Court orders indicate that hearings were being conducted by telephone conference in accordance with the Iowa Supreme Court Order entered on March 17, 2020 due to the national pandemic. The release conditions set for Ms. Park reflect the uncertainty of the pandemic and nothing more. The circumstances of Ms. Park's release should not be relied upon by the Court.

CONCLUSION

In considering the proper amount of bond, the Court is to consider all available information. High bail amounts, in the millions of dollar range, are upheld in murder cases, reflecting substantial concern for public safety and flight risk. Based upon the Defendant's circumstances, the State respectfully asks this Court to deny the Defendant's requests to lower the current bond amount and confirm bond in the amount of two million dollars cash only.

WHEREFORE, the State respectfully asks the Court to deny Defendant's motion for bond review and suggested conditions of release and confirm the originally imposed bond amount. If the Defendant is released on a \$2 million cash only bond, the State requests the Defendant be placed on pretrial release supervision with an ankle monitor and any other conditions the Court deems appropriate under the circumstances.

Respectfully Submitted,



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If you require the assistance of auxiliary aids or services to participate in court because of a disability, immediately call the Fifth Judicial District's ADA coordinator at 515-286-3394. (If you are hearing impaired, call Relay Iowa TTY at 1-800-735-2942.) Disability coordinators cannot provide legal advice.

Copies to:

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