

IN THE DISTRICT COURT IN AND FOR TEXAS COUNTY  
STATE OF OKLAHOMA

TEXAS COUNTY  
**FILED**

STATE OF OKLAHOMA )  
Plaintiff )  
vs )  
CORAGAYLE TWOMBLY )  
Defendant. )

NO. CF-2024-73

APR 16 2024

M. RENEE ELLIS  
COURT CLERK  
By SH Deputy

**MOTION TO HOLD DEFENDANT WITHOUT BAIL**

COMES NOW, George H. Leach III, District Attorney, First Judicial District, in and for Texas County, State of Oklahoma, and moves this honorable Court to hold the defendant without bail. In support of said motion states as follows:

**DEFENDANT SHOULD BE HELD WITHOUT BOND**

Article II, Section 8 of the Oklahoma Constitution, as cited by Brill v. Gurich, states as follows:

“All persons shall be bailable by sufficient sureties, except that bail may be denied for:

1. capital offenses when the proof of guilt is evident, or the presumption thereof is great;
2. violent offenses;
3. offenses where the maximum sentence may be life imprisonment or life imprisonment without parole;
4. felony offenses where the person charged with the offense has been convicted of two or more felony offenses arising out of different transactions; and
5. controlled dangerous substances offenses where the maximum sentence may be at least ten (10) years imprisonment.

On all offenses specified in paragraphs 2 through 5 of this section, the proof of guilt must be evident, or the presumption must be great, and it must be on the grounds that no condition of release would assure the safety of the community or any person.”

The defendant’s actions meet the above categories 1, 2, and 3 and thus under the Oklahoma Constitution the denial of bail is appropriate.

1. First degree murder is a capital offense and at this time the relevant aggravating circumstance as found at 21 O.S. 701.12 is: