



**IN THE CIRCUIT COURT OF HUNTSVILLE  
MADISON COUNTY, ALABAMA**

**CITY OF HUNTSVILLE, a** )  
**Municipal Corporation within** )  
**The State of Alabama,** )  
 )  
**vs.** )  
 )  
**MARTELL HOLT,** )  
**DEFENDANT.** )



**MOTION TO REVOKE BOND**

COMES NOW the City of Huntsville by and through its Assistant City Attorney and respectfully moves this Honorable Court to AMEND the bond(s) of the defendant stated above. In support of said motion, the movant states as follows:

1. On May 2, 2024, Defendant stipulated to the facts outlined in the above styled case. Defendant was found to be guilty of Harassing Communications.
2. Defendant was sentenced to probation and to have no contact with the victim (Melody Rogers), except as outlined in their divorce agreement, DR20-900543.
3. After posting his appeal bond, Defendant has continuously contacted the victim about matters outside of their divorce agreement.
4. The victim met with undersigned on this date to discuss our upcoming trial. After the victim left my office, Defendant contacted her demanding to know why she was here. The victim feels threatened, and in fear for her safety now that she is possibly being watched by Defendant, or someone close to Defendant.
5. Based on the repeated behavior of Defendant, the City requests this honorable court to amend the Defendant's appeal bond and conditions of release to reflect that he is to have no contact, direct or indirect with the victim for any reason other than child custody issues.

Respectfully submitted this, the 22nd day of November 2024.

**/s/ Joshua R. Graff**  
Assistant City Attorney  
City of Huntsville, Alabama