

**FILED**  
**01-14-2021**  
**Clerk of Circuit Court**  
**Kenosha County**  
**2020CF000983**

**STATE OF WISCONSIN, CIRCUIT COURT, KENOSHA COUNTY**

State of Wisconsin, Plaintiff

**RESPONSE TO STATE'S  
BOND MOTION**

-vs-

Kyle Rittenhouse, Defendant

Case Nos. 2020CF983

Kyle Rittenhouse, by and through his attorney, Mark D. Richards, hereby responds to the State's Motion to Modify Conditions of Bond as follows:

1. Mr. Rittenhouse does not object to a bond condition prohibiting the possession or consumption of alcohol.
2. Mr. Rittenhouse is not currently and has not ever been a member of any of the organizations the State lists in its motion.
3. The known complainants in this matter are all Caucasian males.
4. The State has done an extensive search of all of Mr. Rittenhouse's social media as part of its investigation in this case. Upon information and belief, no information linking Mr. Rittenhouse to the listed organizations has been found.
5. Additionally, the State has presented no evidence of Mr. Rittenhouse visiting any of the listed organizations' websites.
6. The State's bond motion is a not-so-thinly veiled attempt to interject the issue of race into a case that is about a person's right to self-defense.
7. Nonetheless, as Mr. Rittenhouse has no membership, affiliation, or affinity for any of the identified groups, the defense has *no* objection to a bond modification prohibiting Kyle Rittenhouse from having any knowing contact with any known hate groups or their members.

Electronically Signed On: 1/14/2021

Mark D. Richards, #1006324  
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