

**IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION**

COMMONWEALTH OF PENNSYLVANIA	:	
	:	
v.	:	CP-38-CR-0430-2023
	:	
VERONIKA RODRIGUEZ	:	

ENTERED & FILED
MAY 05 2025 4:30pm
CLERK OF COURTS
LEBANON, PA

MOTION REQUESTING BAIL MODIFICATION

AND NOW, COMES the Commonwealth, by and through the Office of the District Attorney of Lebanon County, who respectfully presents the following in support of the instant request:

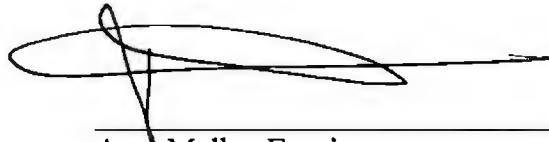
1. Defendant in the above-captioned matter, has been charged with two counts of a Violation of the Wiretap Act and one count of False Reports to Law Enforcement.
2. On December 17, 2024, this Court issued a gag order on the case. The gag Order indicates that all witnesses are prohibited from disseminating any information about this case to anyone.
3. The Commonwealth received text message communication between the Defendant and another individual. In those text messages, Defendant indicated that there is a podcast about her case and asked how the witness would like to be identified. Thereafter, on January 20, 2025, the Defendant sent a text message to the same witness stating that the "podcast lady said to tell you this."
4. This issue was addressed with the Court at the hearing that was held on May 1, 2025. At that time, this Court instructed again that no witnesses shall be communicating with anyone regarding the case. This Court indicated that should the Defendant fail to abide by the Gag Order, bail could be amended so that her communications could be monitored.
5. Thereafter, the Commonwealth received information that the Defendant again sent text communications to a Commonwealth witness. On May 1, 2025 at 3:24pm, Defendant

indicated that she learned the individual planned to testify against her and how this made the Defendant feel.

6. It is the position of the Commonwealth that these communications are in direct violation of this Court's Order.

WHEREFORE, the Commonwealth requests this Honorable Court revoke Defendants bail as she continues to violate the gag order.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'Amy Muller', written over a horizontal line.

Amy Muller, Esquire
Senior Deputy District Attorney
Attorney ID #210216

Date: 2 May 2025

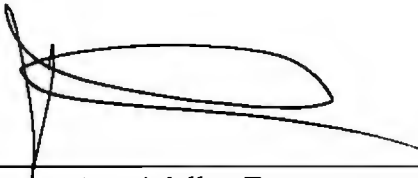
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CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA :	:	
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VERIFICATION

I, Amy Muller, Senior Deputy District Attorney of Lebanon County, hereby deposes and says that the facts set forth in the foregoing **Motion to Modify Bail** are true and correct to the best of her knowledge, information and belief.

May 2, 2025

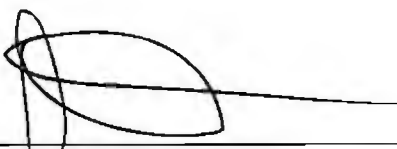


Amy Muller, Esq.
Attorney ID #210216

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

May 2, 2025



Amy Muller, Esq.
Attorney ID #210216

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CERTIFICATE OF SERVICE

I, Amy Muller, Esq., of the Lebanon County District Attorney's Office, do hereby certify
I have forwarded a true and correct copy of the foregoing Motion on May 2, 2025, to the following
in the manner listed:

Service via email:

Ian Ehrgood, Esquire
Attorney for Defendant

Date: May 2, 2025



By: _____
Amy Muller, Esq.
Senior Deputy District Attorney
Attorney ID #210216

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY

PENNSYLVANIA

CRIMINAL

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MAY 05 2025 4:30 pm
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LEBANON, PA

COMMONWEALTH OF PENNSYLVANIA : ACTION NO. CR-430-2023

VS.

VERONKIA RODRIGUEZ

ORDER

AND NOW, to wit, this 5th day of May, 2025, upon consideration of Commonwealth's Motion for to Revoke Bail, it is hereby ordered that a hearing shall be held on May 8, 2025, at 8:30 A.M. ~~P.M.~~ in Courtroom 2.

BY THE COURT,


CHARLES T. JONES, JR.,

CC: ADA- Amy Muller, Esquire *to*
Ian Ehrgood, Esquire *to*
Court Administration *to*

PURSUANT TO Pa.R.Crim. P. 114
All parties are hereby notified

MAY 07 2025 *vd*

Clerk of Courts, Lebanon, PA

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
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COMMONWEALTH OF PENNSYLVANIA :

v. :

VERONIKA RODRIGUEZ :

CP-38-CR-0430-2023

ENTERED & FILED
MAY 05 2025 4:30pm
CLERK OF COURTS
LEBANON, PA

ORDER

AND NOW, to wit this ____ day of _____ 2025, upon consideration of the within
motion, it is Ordered that Defendant's bail is revoked.

BY THE COURT

Unsigned

J.

cc: District Attorney
Ian Ehrgoodp, Esq.
Court Administration