

IN THE CIRCUIT COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
FLAGLER COUNTY, FLORIDA

CASE NO.: 2016 CF 000534

STATE OF FLORIDA

v.

JUSTIN CAMPBELL,

Defendant.

_____ /

MOTION FOR MODIFICATION OF SENTENCE

COMES NOW, Defendant, JUSTIN CAMPBELL, by and through the undersigned attorney, pursuant to Florida Rule of Criminal Procedure 3.800(c), and files this Motion for Modification of Sentence. In support thereof, Defendant states the following:

1. On March 1, 2017, Defendant entered a plea of no contest to one (1) count of Battery and one (1) count of False Imprisonment.
2. This Court subsequently adjudicated Defendant guilty of both counts and sentenced him to serve 180 days in Flagler County Jail to be followed by three (3) years of felony probation.
3. This Court also granted Defendant's request for a fifteen (15) day furlough in order to prepare to serve the 180 day county jail sentence.
4. Defendant owns and operates a painting company in Palm Coast, Florida named Campbell Exterior.
5. Defendant's company has been in operation for approximately three (3) years and employs eleven (11) people.
6. Defendant has authorized his girlfriend, Monique Garcia, to run the company and has granted Ms. Garcia a power of attorney in order to handle the affairs of the company. However, Ms. Garcia does not have experience operating a business and is unable to operate Defendant's business. As a result, Defendant's business is suffering and may have to cease operation.
7. The Office of the State Attorney objects to a modification of Defendant's sentence.

WHEREFORE, Defendant respectfully requests that this Honorable Court grant Defendant's Motion for Modification of Sentence to include community control and any other sanctions that this Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email delivery to the Office of the State Attorney, at eserviceflagler@sao7.org, on this 31st day of March, 2017.



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