

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

CASE NO.: 2020 CF 667

IN RE:

STATE OF FLORIDA

VS.

TRAVIS S. SMITH,

Defendant.

DEFENDANT'S URGENT MOTION FOR RELEASE FROM CUSTODY

The Defendant, TRAVIS S. SMITH, by and through his undersigned attorney, moves this Honorable Court to release the Defendant from custody in the above-referenced case, and as grounds therefore would show as follows:

1. On May 25, 2022, the Defendant was remanded into custody by the Court after a jury found the Defendant guilty of one count of Misdemeanor Battery. Up until his remand into custody, the Defendant had been on bond/release since his arrest in August 2020, and with no violations or issues.

2. The Defendant has been a resident of Flagler County, Florida for quite some time. The Defendant has been well established in this area.

3. The Defendant has always appeared in Court in this case, when ordered or when needed. The Defendant is not a flight risk.

4. The Defendant has no prior criminal record.

5. The Defendant's release does not pose any threat or danger to the community.

6. The Defendant is of stable mental condition.

7. The Court has set the sentencing hearing in this case on the Misdemeanor Battery charge for July 22, 2022. The Defendant needs to be out of jail in order to go back to work, to be able to take care of his financial affairs, and there is

no reason for the Defendant to remain incarcerated pending sentencing.

WHEREFORE, the undersigned respectfully requests that the Defendant be released from the Flagler County Jail pending sentencing.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by: E-Mail: Eservicetagler@sao7.org Mail: The Office of the State Attorney, 1769 E. Moody Blvd., Building 1, Bunnell, FL 32110 Fax Hand Delivered to: Office of the State Attorney this 27 day of May, 2022.

RICE LAW FIRM, P.A.

/s/ Philip J. Bonamo

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