

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

STATE OF FLORIDA,
Plaintiff,

CASE NUMBER: 2026-102441-CFDL

v.

LINDSEY BROOKE ISAACS,
Defendant.

_____ /

**MOTION TO QUASH ARREST WARRANT,
SUPPRESS EVIDENCE, AND REQUEST FOR FRANKS HEARING**

COMES NOW the Defendant, LINDSEY BROOKE ISAACS, by and through undersigned counsel, and respectfully moves this Honorable Court to quash the arrest warrant issued in this case, suppress all derivative evidence, and conduct a hearing pursuant to Franks v. Delaware, 438 U.S. 154 (1978). In support thereof, the Defendant states:

I. INTRODUCTION

This case arises from a tragic multi-vehicle collision on Interstate 4, resulting in multiple fatalities. The seriousness of the incident, however, does not lessen the State's constitutional burden.

An arrest warrant must be supported by probable cause grounded in specific, articulable facts linking the accused to the criminal conduct. Here, the arrest warrant affidavit fails to establish a critical element common to every charged offense: that Ms. Isaacs was the driver of the vehicle at the time of the crash.

Instead, the affidavit relies on ownership of the vehicle, generalized witness observations, and the expectation that future forensic testing may identify the operator. That is insufficient as a matter of law.

II. LEGAL STANDARD

The Fourth Amendment and Article I, Section 12 of the Florida Constitution require that an arrest warrant be supported by probable cause.

Probable cause exists only where the facts would warrant a reasonable belief that the accused committed the offense, Illinois v. Gates, 462 U.S. 213 (1983).

III. ARGUMENT

Each charged offense requires proof that the Defendant operated the vehicle.

The affidavits contain no eyewitness identification, no video identification, and no forensic identification at the time of issuance.

Ownership alone is insufficient to establish operation.

The State has represented that forensic evidence would likely identify the operator, demonstrating that identity was not established at the time of the warrant, see State's Motion to Intervene and Response to Petition for Writ of Replevin and Objection to Release of Property, filed April 1, 2026, in case 2026-10508-CIDL.

Probable cause cannot be based on future evidence.

In its arrest warrant affidavit, crash report, and search warrant affidavit, the State alleges a massive high-speed, 100-115 mph, collision wherein the Defendant's Dodge Durango struck a Ford Focus with such force that the Ford was sent off the roadway, into a guardrail, before reentering the roadway and colliding with a Honda Pilot, killing the occupants of the Pilot. The Defendant then allegedly swerved to the right and impacted a Suzuki motorcycle with enough force to eject the rider, killing him.

In the State's Motion to Intervene, filed in case number 2026-10508-CIDL on April 1, 2026, the State focused on whether additional forensic analysis may identify the operator of the vehicle. In the State's replevin filing and the attached search-warrant materials, the State represented that the vehicle was being retained for additional analysis, including DNA, fingerprint, event-data-recorder, infotainment, and seat-position evidence that 'would likely' identify the operator at the time of the collision.

Of course, DNA, fingerprints, and other such evidence of the Defendant would be expected to be found in the Dodge Durango, as it is her personal vehicle that she drives daily. Such a finding would not be dispositive of the Defendant's involvement in this collision.

The State alleges that when they found the Dodge Durango, it had damage to the left side consistent with the collision with the Ford Focus. There is no mention in the investigation of damage to the right side of the Dodge Durango consistent with impacting the Suzuki.

The State's lone witness, as quoted in the arrest warrant affidavit, says he was traveling behind a semi-truck when the collision occurred. He allegedly saw the Durango swerve into a pack of motorcycles, across all three lanes, and almost hit the median guardrail. He could not see the other vehicles and "believes" the Durango caused "both accidents." He further states that "I could assume this accident could have been caused when the Durango swerved back across two lanes after striking the motorcycle or maybe cutting someone else off, again, the Durango cut me off very aggressively, drove into the motorcycle, almost hit the guardrail, and swerved back into the middle lane." At no time does this witness provide any further description of the vehicle other than a Black Dodge

Durango with a Florida plate. There is no description whatsoever of the Defendant or anyone else.

Considering the massive collision described by the witness and documented by the FHP, one would expect to find the Dodge Durango with extensive damage to both the left and right sides. The damage allegedly found by the FHP on the Durango is described simply as “marks, “smudges,” or “rub marks.” Additionally, one would expect to find evidence of such a high-speed, multi-impact, multi-vehicle collision on the Durango’s electronic data recorder, yet there is no mention of such evidence.

There is no indication of matching paint transfer between the Durango and the Ford Focus, nor of rubber transfer between the left front tire of the Durango and the tire marks as described by the FHP on the Focus. The left front tire of the Durango appears to be unremarkable.

Additionally, the arrest warrant in this case states that the Defendant was the driver, sole occupant, and registered owner of the Dodge Durango involved in this case. This allegation is speculative, and throughout the remainder of the warrant, there is no description of how the State reached such a conclusion.

In short, thus far in this investigation, the State has absolutely no evidence identifying or linking the Defendant as the driver of a vehicle involved in this collision. Even giving the State the benefit of the doubt and viewing the information in the light most favorable to the State, with the scant “evidence” described in the arrest and search warrant affidavits, there is no probable cause for the Defendant’s arrest.

IV. SUPPRESSION

An invalid warrant requires suppression of all derivative evidence. Wong Sun v. United States, 371 U.S. 471 (1963).

V. FRANKS HEARING

The Defendant requests a Franks hearing based on omissions and mischaracterizations in the affidavit regarding identity and evidentiary certainty.

WHEREFORE, the Defendant requests that this Court quash the arrest warrant, suppress evidence, conduct a Franks hearing, and grant further relief as appropriate.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a copy of this document was served upon the Volusia County State Attorney's Office via the Florida E-File Portal on this 21st day of April, 2026.

By:

/s/ Patrick J. McGeehan

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