

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

STATE OF FLORIDA,

CASE NO.: 2021-CF 000739

VS.

DIVISION: PERKINS

JAMAL NEJAME,
_____ /

Defendant's Motion to Modify Bond Conditions

Pursuant to § 903.047(2), Fla.Stat., and for good cause, defendant requests this Court to modify the defendant's conditions of bond to allow the defendant to return to his home and as grounds would state:

1. That Defendant was arrested on or about July 22, 2021, on a warrant for "Shoot/Throw Missile in Dwelling." On the warrant was an instruction from Judge France that Mr. Nejame shall not reside within 500 feet on 100 Bridgehaven Dr. Palm Coast, FL, or have any contact with the victims. Additionally, Mr. Nejame is not to possess any weapon or firearm while on bond. Mr. Nejame has not violated any of these conditions.

2. Mr. Nejame is not allowed to return to the home he owns located 97 Bressler Lane in Palm Coast. His home at 97 Bressler Lane and the home at 100 Bridgehaven Dr. have a shared property line and are within 500 feet of one another. The terms of the warrant and release conditions effectively force Mr. Nejame out of his residence.

3. Mr. Nejame works as an armed security guard. Because he cannot possess a weapon, Mr. Nejame cannot work in his chosen profession while on bond. Without an income, it becomes financially devastating for Mr. Nejame to lease another residence (if he can even find one) indefinitely during these proceedings.

4. The Court's instruction effectively leaves Mr. Nejame homeless and unemployable.

5. Formal charges are still pending.

WHEREFORE, defendant respectfully requests this Court to modify the conditions of the defendant's release conditions to permit Mr. Nejame to return to his home.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service via the Florida Courts E-Filing Portal, in accordance with Administrative Order No. AOSC13-49, to the Office of the State Attorney, at eserviceflagler@sao7.org this 28th day of July, 2021.

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