

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

LINDSEY ISAACS,
Plaintiff,

and

CASE NO: 2026 10508 CIDL
DIVISION: 2

FLORIDA HIGHWAY PATROL,
a division of the Florida State Department of
Highway Safety and Motor Vehicles,

FILED
2026 APR - 1 AM 10:43
CLERK OF THE CIRCUIT
& CITY COURT VOLUSIA CO., FL.
CC 32

**STATE'S MOTION TO INTERVENE AND RESPONSE
TO PETITION FOR WRIT OF REPLEVIN AND
OBJECTION TO RELEASE OF PROPERTY**

COMES NOW the State of Florida, by and through its undersigned counsel, and hereby files this Motion as it has a necessary and important stake in the outcome of this decision, and in support thereof, states:

1. On October 4, 2025, at approximately 9:53 PM, a black Dodge Durango traveling eastbound in the center lane on Interstate 4 near mile marker 108, within Volusia County, struck the left side of a Ford Focus driving in the left inside lane of the highway.
2. The force of being struck by the Dodge Durango caused the Ford Focus to travel off the roadway to the left, striking the guardrail in the median, and then redirecting the Ford Focus to reenter the highway and striking the left side of a Honda Pilot. The impact caused the operator of the Honda Pilot to lose control of the vehicle and crash, resulting in the deaths of the two occupants inside.

3. Upon impacting the Ford Focus, the Dodge Durango swerved to the right, striking a Suzuki motorcycle causing the operator of the motorcycle to be ejected from his vehicle resulting in his death.
4. The Dodge Durango then left the scene and was tracked hours later using the Flock license plate reader system where it was located at the Integra Woods Apartments, at 1000 Integra Woods Boulevard, Palm Coast, Florida, the location where the registered owner, Lindsey Isaacs, resides.
5. The Dodge Durango was observed by Flagler County Sheriff's Office deputies parked outside Ms. Isaacs' apartment. Upon inspecting the exterior of the vehicle, investigators observed damage located on the left side matching damage located on the right side of the Ford Focus.
6. Through the use of investigative techniques and license plate reader cameras, investigators were able to track the origin of the Dodge Durango's route earlier that night to the Vape Up Café in Davenport, FL. Surveillance video from the store shows a black Dodge Durango arriving at the parking lot at approximately 8:08 PM and depicts the Petitioner exiting the driver's side of the vehicle, entering the store, and then exiting the store and re-entering the vehicle through the driver's side. Less than two hours later, the same Dodge Durango was involved in this crash.
7. The Dodge Durango was seized by law enforcement on October 5, 2025, and a search warrant for the vehicle was signed on October 10, 2025, by Judge Weston. Investigators executed the search on October 14, 2025, and the Return was filed with the Flagler County Clerk on October 22, 2025. See attached Warrant, Affidavit and Return as "Exhibit A".

8. Petitioner, Lindsey Isaacs, now seeks the return of the Dodge Durango involved in the investigation of a violation of Florida Statute 316.027(2)(c) Leaving Scene of Crash Involving Death by way of a civil petition for replevin. The vehicle is currently in the possession of Florida Highway Patrol at their evidence lot located in Deland, FL, and is being held as direct evidence in this investigation involving the deaths of three motorists.
9. The Dodge Durango is currently being held for evidentiary purposes and for further analysis as it would likely contain evidence directly linking it to the collisions on Interstate 4. This evidence would include but is not limited to the following: impact damage on the Durango consistent with impact damage to the other vehicles involved; paint transfer; and missing parts consistent with debris left on the highway. In addition, the interior of the vehicle will likely contain evidence identifying the operator at the time of the collision. Such evidence would include: DNA and fingerprint evidence on the steering wheel, shifters and door handles; and the positioning of the driver's seat consistent with the height of the operator.
10. Although the Petitioner is not currently charged criminally, charges are likely forthcoming and the release of crucial evidence such as the vehicle suspected of being involved in this crash would impact the State's ability to prosecute and unfairly prejudice the State's case.
11. There is no rule which precludes the State from commencing prosecution at any time for this charge, and for the crime of Leaving the Scene of an Accident Causing Death where three people were killed, it is not unreasonable that an investigation would take over five months to be completed for charges to be filed. Pursuant to Fla. Stat. § 775.15(1) "A

prosecution for a capital felony, a life felony, or a felony that resulted in death may be commenced at any time”.

12. F.S. § 933.14(1) governs and provides a framework through the criminal courts for petitions to return property seized pursuant to a search warrant. The remedy provided under F.S. § 933.14(1) establishes the jurisdiction for requests to release seized property is with the judge to whom the search warrant is returned, and that the filing of charges is not a prerequisite for seeking relief under the statute. *Golding v. Director, Public Safety Department, Metropolitan Dade County*, 400 So.2d 990 (Fla. 3d DCA 1981) (citing *Harvey v. Drake*, 40 So.2d 214 (Fla. 1949).
13. “If no cause is shown for the return of any property seized or taken under a search warrant, the judge shall order that the same be impounded for use as evidence at any trial of any criminal or penal cause growing out of the having or possession of said property,…” F.S. § 933.14(4).
14. The Dodge Durango was lawfully seized and searched upon a finding of probable cause, and the Petitioner has not established sufficient cause for the return of the vehicle, nor has she sought relief with the judge to whom the search warrant was returned as required under F.S. § 933.14(1).
15. Law enforcement and the State have a duty to securely maintain the integrity of all criminal evidence, and when a prosecution does commence, to ensure its availability for inspection.
16. The Dodge Durango involved in this investigation is alleged to be the instrumentality which caused a crash resulting in the deaths of three individuals and fled the scene and must be kept secure until a filing decision is made, as the release of the vehicle would

compromise the integrity of the evidence, prejudice the State in moving forward with prosecution, and deny justice to the families of the victims.

WHEREFORE, the State of Florida moves this Honorable Court to deny the petition to return the seized property.

RESPECTFULLY SUBMITTED
FOR THE STATE ATTORNEY

/s/ MICHAEL WILLARD
MICHAEL WILLARD
ASSISTANT STATE ATTORNEY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy hereof has been furnished by U.S. mail/delivery to Marc E Dwyer, Esq. and Jacob B. Steele, Esq., 2517 West Moody Blvd., Flagler Beach, FL 32136, this 31 day of March, 2026.

/s/ MICHAEL WILLARD
MICHAEL WILLARD
ASSISTANT STATE ATTORNEY
Florida Bar No.: 0670707
101 N. Alabama Ave.
4th Floor
Deland, FL 32724
(386) 822-6400
eservicevolusia@sao7.org

Exhibit A

INVENTORY AND RETURN

Swabs of interior driver's door handle, steering wheel,
gear shift, and interior passenger's door handle
(2) water bottles from front center cup holders
rolling papers, multi-colored baggies, and smoked cigarette w/
unk. substance from center console
partial green grinder from bag in trunk

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2025 OCT 22 PM 1:19
CLERK OF THE CIRCUIT
& CT. COURT VOLusia CT., FL
CCTO

(STATE OF FLORIDA
COUNTY OF FLAGLER)

I, CARMINE CERZO received this Search Warrant on the 14th day of OCT., 2025, and I executed the same
in Flagler County, Florida, on the 14th day of OCT., 2025, by making a search as therein directed and I do
swear that the above INVENTORY contains a true and detailed account of all the property taken by me on the warrant
and that I have delivered a copy of the Search Warrant and this INVENTORY AND RETURN to:
Flagler County Clerk of Court.

[Signature] #312
LAW ENFORCEMENT OFFICER

Sworn to and subscribed before me this 14th day of OCT., 2025.

[Signature]
Savannah MacLellan
Notary Public
State of Florida
Comm# HH670202
Expires 4/28/2029
Notary Public/Law Enforcement Officer



SEAL... WARRANT - Case No: FHP25ON0469308 Agency: JHP
Affidavit Checksum: 8f1dcccdd8ecaffa4facb0842c522cbd0d6ab7c9d59043cae19eb9a407211de03

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT,

IN AND FOR FLAGLER COUNTY, FLORIDA

GENERAL AFFIDAVIT AND APPLICATION FOR SEARCH WARRANT

STATE OF FLORIDA)
COUNTY OF FLAGLER)
CASE NUMBER: FHP25ON0469308

BEFORE ME, the undersigned Judge of the Circuit Court in and for Flagler County, Florida, personally came, Corporal Tiffany Jateff,

Who being first duly sworn, deposes and says: That the affiant has reason to believe that a certain vehicle located in Flagler County, Florida, being known and described as follows, to-wit:

A black-in-color 2025 Dodge Durango Sport Utility Vehicle (VIN: 1C4SDJCT7SC529164) bearing Florida tag RJVN10, owned by Lindsey Brooke Isaacs,

hereinafter "the vehicle" that was occupied by and/or under the control of an unknown subject, contains evidence of a felony. The vehicle is currently located at the Flagler County Sheriff's Office Evidence Facility, with the physical address of 61 Sheriff EW Johnston Dr., Bunnell, FL 32110 in the Forensic Bay.

PROPERTY SOUGHT

Your Affiant seeks to seize and remove the items of evidence below:

1. Any and all trace evidence including but not limited to fingerprints, blood, saliva, skin/epithelial cells, DNA; and
2. Any automotive information or parts which tend to indicate the mechanical condition or technical data of the vehicle to include removing or accessing the electronic data recorder (EDR), which may be relevant to the causation of the crash, evidence of who was the operator at the time of the crash, or any other violation of law, and the Infotainment Center Data which will show any phones connected to it; and
3. Any and all deployed air bag(s) from within the vehicle to be cut and removed separately for a separate off-site examination and processing for the presence of trace evidence including but not limited to fingerprints, blood, saliva, skin/epithelial cell and/or DNA; and
4. Any and all evidence of tools, window punches, keys, key fobs, short-range wireless signal devices or other digital devices that aid in gaining entry to locked vehicles.
5. Any and all evidence related to recent operator and/or recent occupants within the vehicle including but not limited to U.S. currency, credit cards, debit cards, purses/handbags, tote bags, wallets, backpacks, i-Pod, driver's license(s), military identification, school identification card(s), gift cards, phone charger(s), keys, and
6. Any and all cellular devices within the vehicle;

as evidence of the below-described felony crimes and hereinafter referred to as "the property."

2025 OCT 22 PM 1:20
CLERK OF THE CIRCUIT COURT
VOLUSIA COUNTY, FL
E.D.

GROUNDS FOR ISSUANCE

The property sought constitutes evidence relevant to proving that a felony has been committed and is material and relevant to proving the following violations of law:

- LEAVING SCENE OF CRASH INVOLVING DEATH, F.S.S. 316.027(2)(c)
- LEAVING SCENE OF CRASH INVOLVING BODILY INJURY, F.S.S. 316.027(2)(a)

PROBABLE CAUSE:

Your Affiant has been a State Trooper since 2017 and is currently a Traffic Homicide Investigator since 2020 and is currently assigned to the Deland District of the Florida Highway Patrol. Your affiant investigates traffic crashes and traffic fatalities and has investigated many misdemeanor and felony crimes against persons. Your affiant has investigated hundreds of traffic crashes to include crashes with serious bodily injury and death. Your affiant utilizes the resources and veteran manpower of the Florida Highway Patrol in the Deland District as well as FHP's statewide resources.

The facts establishing the grounds for this application and the probable cause for believing that such facts exist are as follows:

The Dodge Durango with Florida tag RJVN10, that is the subject of this warrant, was involved in a motor vehicle collision on October 4, 2025, at approximately 9:53 PM, on Interstate 4 in the area of mile marker 108, within Volusia County, Florida. The Dodge Durango was traveling eastbound on Interstate 4 in the center travel lane. The left side of the Dodge Durango struck the right side of a Ford Focus sedan (Florida tag IVTZ24). The Dodge Durango subsequently traveled to the right. The right side of the Dodge Durango struck a Suzuki GSX1300R motorcycle (Florida tag MYHH77). The driver of the Suzuki GSX1300R was thrown from the motorcycle. The force of being struck by the Dodge Durango caused the Ford Focus to travel off the roadway to the left and strike the guardrail of the median. The Ford Focus then reentered the roadway, and the front of the Ford Focus struck the left side of a Honda Pilot. The driver of the Suzuki (Joaquin A. Deno), the driver of the Honda Pilot (Jorge Ismael Salinas), and the front passenger of the Honda Pilot (Nancy Salinas) died as a result of the injuries they sustained in this crash. After the collision, the Dodge Durango fled the scene without stopping and did not report the traffic crash to law enforcement.

Based on witness descriptions of the hit and run vehicle, the Dodge Durango with Florida tag RJVN10 was located on a Flock license plate reader traveling eastbound on Interstate 4 at the Seminole County line at 9:51 PM. This location is approximately 3 miles west of the crash scene for eastbound traffic. The Dodge Durango was then located on a Flock license plate reader at 10:28 PM at northbound U.S. Highway 1 and Seminole Woods Boulevard. This location is approximately .25 miles from where the Dodge Durango was located.

The Flagler County Sheriff's Office located the Dodge Durango in the parking lot of the Integra Woods apartment complex at 1000 Integra Woods Boulevard, Palm Coast, Florida 32164. The Dodge Durango was parked outside of the registered owner, Lindsay Brooke Isaacs, apartment. The damage located on the left side of the Dodge Durango was consistent with the damage located on the right side of the Ford Focus.

Based on the totality of the circumstances, the Dodge Durango was taken into the Florida Highway Patrol's custody and was transported to the Flagler County Sheriff's Office secured forensic bay.

Your Affiant knows through training and experience that all modern vehicles contain event data recorders. An event data recorder (EDR), similar to an accident data recorder (ADR) and sometimes referred to informally as an automotive "black box" (by analogy with the common nickname for flight recorders), is a device installed in some automobiles to record information related to vehicle crashes or accidents. EDRs are capable of capturing data

including but not limited to speed of the vehicle shortly before impact, speed at impact, lane departure or evasive action, application of driver-operated braking systems, application of any automated braking system or collision avoidance system, and other mechanical and/or operational information.

Your Affiant knows through training and experience, the Infotainment Center Data can also yield similar data to the EDR but will also provide data regarding connected phones before, during and after the crash.

Your Affiant also knows through training and experience, that most people carry cellular devices on their person at all times and that cellular devices not only contain identifying information such as names, contact lists, recent call lists, bank cards, debit cards, they also contain photographs, videos, text messages, third party application messages, social media platforms and various applications that are in communication with various signals from businesses, cellular towers and other people's Wi-Fi networks that provide location information both current and historical about where the device has traveled. Likewise, communications, photographs, videos, social media accounts and the like tend to evidence dominion and control over a device and its presence in a particular location may be evidence of its user having been in that location.

The property sought is relevant to the investigation and will tend to prove the identity of the driver of the vehicle.

WHEREFORE, your Affiant hereby makes application for a Search Warrant authorizing the Affiant from the Florida Highway Patrol as well as law enforcement personnel aforescribed with proper and necessary assistance, to search the above described vehicle in the daytime/nighttime or on Sunday, and to seize any and all of the aforesaid property found by virtue of such Search Warrant and to list the property seized on a return and inventory, to be filed within the Judicial Circuit within ten days of this date.

ELECTRONIC SIGNATURE

Tiffany Jateff

10/10/2025 1:30:09 PM EST

ELECTRONIC SIGNATURE

Personality appeared before me Tiffany Jateff, a law enforcement officer known to me, who has sworn to and subscribed before me

Gregory Reed

10/10/2025 1:30:09 PM EST

SEARCH WARRANT - Case No: FHP250N0469308 Agency: rHP
Order Checksum: 3b61c5327603aa6ce601131515e6fc4c70033ed723e9cb7290d27e087ed8e15c

SEARCH WARRANT

IN THE NAME OF THE STATE OF FLORIDA TO ALL AND SINGULAR THE SHERIFF MICHAEL CHITWOOD AND, OR DEPUTY SHERIFFS OF VOLUSIA COUNTY, SHERIFF RICK STALY AND/OR DEPUTY SHERIFFS OF FLAGLER COUNTY, THE DIRECTOR OF THE FLORIDA HIGHWAY PATROL GARY HOWZE AND, OR HIS STATE TROOPERS OF THE STATE OF FLORIDA, THE COMMISSIONER OF THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT MARK GLASS AND OR DULY SWORN SPECIAL AGENTS OF THE STATE OF FLORIDA, THE OFFICE OF THE SEVENTH JUDICIAL CIRCUIT STATE ATTORNEY R. J. LARIZZA AND OR DULY SWORN LAW ENFORCEMENT OFFICERS OF THE OFFICE OF THE SEVENTH JUDICIAL CIRCUIT STATE ATTORNEY R. J. LARIZZA.

WHEREAS, Corporal Tiffany Jateff, of the Florida Highway Patrol, County of Flagler, State of Florida, has this day made application before me for a Search Warrant, said application being supported by the General Affidavit and Application for Search Warrant, and said facts made known to me have caused me to certify and find that there is probable cause to believe that certain laws have been and are being violated in or on the vehicle, in Flagler County, Florida, being known and described as follows, to wit:

A black-in-color 2025 Dodge Durango Sport Utility Vehicle (VIN: 1C4SDJCT7SC529164) bearing Florida tag RJVN10, owned by Lindsey Brooke Isaacs,

and there is now being kept in or on said vehicle certain property evidencing that a felony has been committed.

PROPERTY SOUGHT

1. Any and all trace evidence including but not limited to fingerprints, blood, saliva, skin/epithelial cells, DNA; and
2. Any automotive information or parts which tend to indicate the mechanical condition or technical data of the vehicle to include removing or accessing the electronic data recorder (EDR), which may be relevant to the causation of the crash, evidence of who was the operator at the time of the crash, or any other violation of law, and the Infotainment Center Data which will show any phones connected to it; and
3. Any and all deployed air bag(s) from within the vehicle to be cut and removed separately for a separate off-site examination and processing for the presence of trace evidence including but not limited to fingerprints, blood, saliva, skin/epithelial cell and/or DNA; and
4. Any and all evidence of tools, window punches, keys, key fobs, short-range wireless signal devices or other digital devices that aid in gaining entry to locked vehicles.
5. Any and all evidence related to recent operator and/or recent occupants within the vehicle including but not limited to U.S. currency, credit cards, debit cards, purses/handbags, tote bags, wallets, backpacks, i-Pod, driver's license(s), military identification, school identification card(s), gift cards, phone charger(s), keys; and
6. Any and all cellular devices within the vehicle;

as evidence of the below-described felony crimes and hereinafter referred to as "the property sought"

GROUND(S) FOR ISSUANCE

The property sought constitutes evidence relevant to proving that a felony has been committed and is material and relevant to proving the following violations of law:

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 CLERK OF THE CIRCUIT
 & COUNTY CLERK
 VOLUSIA COUNTY, FL
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