

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

STATE OF FLORIDA,
Plaintiff,

CASE NO.: 2019 000729 CF
JUDGE: TERENCE PERKINS

vs.

JOHN JOSEPH CASCONI,
Defendant.

_____ /

STIPULATED MOTION FOR EARLY TERMINATION OF PROBATION

COMES NOW the Defendant, JOHN JOSEPH CASCONI, and prays that this Honorable Court early terminate his probation, and states the following:

1. That the Defendant, JOHN JOSEPH CASCONI, was placed on a period of probation for twelve months commencing May 18, 2020.
2. That the Defendant is eligible for early termination of probation upon completion of special conditions.
3. That Defendant has since satisfied all special conditions of his probation.
4. That Probation Officer, Dawn Irvin, has no objection to early termination of probation.
5. That Assistant State Attorney, Philip Bavington, Esq., has no objection to early terminating probation.
6. As such, this undersigned attorney requests that probation be early terminated.
7. Other grounds to be argued ore tenus.

WHEREFORE, the Defendant prays that this Honorable Court allow Defendant's probation to be terminated in the manner as stated above.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this Stipulated Motion for Early Termination of Probation was electronically filed with Clerk of Courts; Assistant State Attorney, Philip Bavington, Esq. to Probation Officer, Dawn Irvin, dawn.irvin@fdc.myflorida.com and Honorable Terence Perkins on this 10th day of December 2020.

Respectfully submitted,

Hager & Schwartz, P.A.

140 S. Beach Street, Ste 310
Daytona Beach, FL 32114
Telephone: (386) 313-8350
Facsimile: (888) 633-7595
jhager@defendyourcase.com

/s/ John S Hager

JOHN S. HAGER, ESQ.
Florida Bar No. 173967