## IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT, IN AND FOR ALACHUA COUNTY, FLORIDA

STATE OF FLORIDA Plaintiff,		CASE NUMBER: 01-2024-CF-003665-A
VS.		DIVISION IV
STEPHEN DANIEL YOUNG Defendant.		
	_/	

## **MOTION TO REDUCE BOND**

COMES NOW the Defendant, Stephen Daniel Young, by and through the undersigned Counsel, pursuant to Rule 3.131(d) of the Florida Rules of Criminal Procedure, and respectfully moves this Court for entry of an Order releasing the Defendant on his/her own recognizance, or in the alternative, reducing the bond previously set in the above-styled case.

AS GROUNDS for this Motion, the Defendant would show:

- 1. The Defendant was arrested on November 2, 2024 and charged with abuse of a child without bodily harm.
- 2. The Defendant is currently being held without a specified bond.
- 3. On November 3, 2024, the state filed a notice to not seek pretrial detention.
- 4. The Defendant requests to be released to Court Services for contact supervision, or otherwise be reinstated to bond.
- 5. Undersigned counsel intends to present information at the November 25, 2024, hearing that will relate to the safety of the community and the Defendants' ties to the community as well as where he will live if released.
- 6. The Defendant promises to maintain contact with Counsel, to abide by all orders of the Court, and to attend all required court appearances.

WHEREFORE, the Defendant respectfully requests this Court to enter its Order releasing the Defendant on his/her own recognizance, or in the alternative, reducing the bond in the above-styled case.

## **CERTIFICATE OF SERVICE**

THE UNDERSIGNED CERTIFIES that a true and correct copy of the foregoing has been furnished to Omar Hechavarria, Assistant State Attorney, at 120 W. University Ave, Gainesville, Fl 32601, eservice@sao8.org, via E-Service, on November 18, 2024.

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## s/ Bailey Eva Sulsona

Bailey Eva Sulsona Assistant Public Defender Florida Bar Number 1044527 LAW OFFICES OF STACY A. SCOTT PUBLIC DEFENDER 151 Sw 2nd Avenue Gainesville, Fl 32601 (352) 338-7385

E-Mail: sulsonab@pdo8.org E-Service: eservice@pdo8.org