

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

State of Florida  
Plaintiff,

Case Number: 01-2023-CF-003404-A

Division I

vs.

Christopher John Bivins  
Defendant.

**MOTION FOR PRETRIAL DETENTION**

COMES NOW the State of Florida, by and through the undersigned Assistant State Attorney, and moves this honorable court to enter an Order detaining the Defendant in custody pending a final hearing on Pretrial Detention, and sets forth with particularly the grounds and essential facts, as follows:

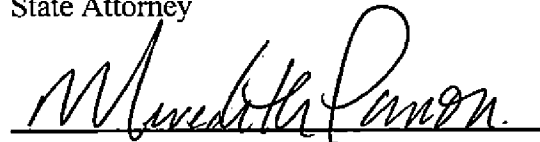
1. The Defendant has been arrested for an offense for which detention may be ordered under §907.041, Fla. Stat., to wit: Burglary of a dwelling with assault or battery and an Act of domestic violence as defined in s. 741.28
2. The State will show that there is a substantial probability that the defendant has previously violated conditions of release and that no further conditions of release are reasonably likely to assure the defendant's appearance at subsequent proceedings. and
3. The defendant poses the threat of harm to the community. The defendant is presently charged with a dangerous crime, there is a substantial probability that the defendant committed such crime, the factual circumstances of the crime indicate a disregard for the safety of the community, and there are no conditions of release reasonably sufficient to protect the community from the risk of physical harm to persons. and
4. The defendant has violated one or more conditions of pretrial release or bond for the offense currently before the court and the violation supports a finding that no conditions of release can reasonably protect the community from risk of physical harm to persons or assure the presence of the accused at trial.

WHEREFORE, the State respectfully moves this honorable court to find that there is probable cause to believe that the Defendant committed the offense, and that the Defendant should be detained in custody pending a final hearing on Pretrial Detention.

STATE OF FLORIDA  
COUNTY OF ALACHUA

Personally appeared before me the undersigned Meredith Poisson, Assistant State Attorney, Eighth Judicial Circuit of Florida, who, being first duly sworn, certifies that he/she has received testimony under oath supporting the grounds and the essential facts alleged in this motion.

Brian S. Kramer  
State Attorney



Meredith Poisson  
Assistant State Attorney  
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The foregoing instrument was acknowledged before me this 14th day of March, 2024. by Meredith Poisson, Assistant State Attorney, who is personally known to me and who did take an oath.

  
NOTARY PUBLIC



**SHELBY STEVENS**  
Commission # HH 462247  
Expires December 20, 2027

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to Yolanda Means, Attorney for the Defendant, by email, this 14th day of March, 2024.

**s/ Meredith Poisson**  
Meredith Poisson  
Assistant State Attorney  
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