

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PASCO COUNTY, STATE OF FLORIDA
CRIMINAL FELONY DIVISION

STATE OF FLORIDA,

v.

CURTIS JUDSON REEVES,
Defendant.

spn 00683538 /

Case No.: CRC14-00216CFAES

Division: 1

MOTION TO MODIFY CONDITIONS OF PRE-TRIAL RELEASE

COMES NOW the Defendant, CURTIS JUDSON REEVES, by and through his undersigned Counsel, and respectfully moves the Court for an Order modifying the conditions of his release and as grounds therefore, would state as follows:

1. On January 13, 2014, the Defendant, CURTIS JUDSON REEVES, was arrested for the charge of Second Degree Murder in the above referenced case.

2. On July 11, 2014, this Honorable Court entered an Amended Order on Motion to Release Defendant on His Own Recognizance or Set Reasonable Bail.

3. As a condition of release, the Defendant, CURTIS JUDSON REEVES, is not allowed to have possession of a firearm and all of his personal firearms are to be surrendered either to the Pasco Sheriff, to Richard Escobar, or another person acceptable to the Court after a hearing.

4. All of the Defendant's personal firearms are currently in the possession of his attorney, Richard Escobar.

5. Defendant respectfully requests that this condition of pretrial release be modified to permit Sgt. Jarrett B. Seal, the commander of the Tampa Police Department Bomb Squad to take possession of and hold until further notice from this Honorable Court, all of Defendant's

firearms. The firearms will be held in a safe at Sgt. Seal's home in Odessa.

WHEREFORE, the Defendant, CURTIS JUDSON REEVES, by and through his undersigned attorney, respectfully prays that this Honorable Court grant this Motion to Modify Conditions of Release to allow that Jarrett B. Seal take and keep possession of Defendant's firearms until further notice.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Hand Delivery to the Office of the State Attorney, Dade City, Florida this 13th day of August, 2014

/s/ Dino M. Michaels _____

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