

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

STATE OF FLORIDA

Plaintiff,

vs.

CASE NUMBER: 01-2022-CF-001758-A

DIVISION IV

JASON LEE SAUL

Defendant.

_____ /

MOTION TO REDUCE BOND OR FOR RELEASE ON RECOGNIZANCE

COMES NOW the Defendant, Jason Lee Saul, 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 May 20, 2023 and charged with driving under the influence causing death.
2. The Defendant is indigent and cannot post the present bond of \$100,000.00.
3. If released, Defendant will reside at 501 SW 75th St #G6, Gainesville, FL 32607.
4. This incident occurred on January 22, 2022.
5. In the year and a half that elapsed, Mr. Saul has not found himself in any additional trouble. Mr. Saul has not attempted to leave this jurisdiction or evade process.
6. Mr. Saul worked as a subcontractor at the time of the incident and, at the time of his arrest, was supplementing his income with work at the Best Western. He can go back to that job if he manages to secure his release.
7. He has been in a stable relationship with his fiancée for the last five years. They have a blended relationship and he helps care for her two kids along with his own two children. Their ages are 17, 19, 13, and 8.
8. Defense counsel has watched the tape and disagrees with the conclusions made by the FHP officer who ordered the warrant which was used to secure a sample of Mr. Saul's blood.
9. The defense understands that a terrible tragedy occurred in this matter and that two families are suffering, but believes that this tragedy was not the result of a crime.
10. Mr. Saul would consent to an ankle monitor, an alcohol or drug monitor, or any other sort of pretrial release the Court might contemplate here.
11. If this Court were willing to reduce the bond to an amount closer to \$40,000.00, Mr. Saul

would probably be able to secure his release and help support his family.

12. 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 Daniel Ley, Assistant State Attorney, at 120 W. University Ave, Gainesville, FL 32601, eservice@sao8.org, via E-Service, on June 15, 2023.

s/ **David R Cianci**
David R Cianci
Assistant Public Defender
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