

IN THE CIRCUIT COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
VOLUSIA COUNTY, FLORIDA

STATE OF FLORIDA,

v.

MATTHEW MOULTON,

Defendant.

CASE NO.: 2025 102222 CFDL

JUDGE A. KATHLEEN McNEILLY

MEMORANDUM BRIEF

Rules Regulating The Florida Bar

Rule 4-3.8. Special Responsibilities Of A Prosecutor

The prosecutor in a criminal case must:


- a. Refrain from prosecuting a charge that the prosecutor knows is not supported by probable cause.

Probable cause must be based on tangible evidence that rationally supports a reasonable conclusion. It must be greater than a hunch or suspicion to protect from arbitrary or irrational deprivation of rights.

The state's probable cause asserts with tangible evidence that I was operating lawfully. Their investigation offers no evidence contrary.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been mailed to: Jeanne Stratis, Assistant State Attorney, on October 1st 2025.


Matthew Moulton Defendant

2025 OCT -9 AM 11:26
CLERK OF THE CIRCUIT
& CITY COURT
VOLUSIA COUNTY, FL
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Volusia County Division of Corrections
Matthew Moulton - 1160048
354 Indian Lake Road
Daytona Beach, FL 32124

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