

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 3

Chilling Effect Doctrine - A principle of constitutional law that invalidates statutes that are worded in such a way as to make people fearful of engaging in legitimate, constitutionally protected First Amendment activities.

According to *Romero v. State* (2021) Florida's criminal threat statutes are worded in such a way and are only permissible with implied case law; True Threats Doctrine, which was not applied to their usage in my case, at multiple levels of law, across multiple states, clearly exemplifying that Florida's criminal threat statutes are constitutionally invalid and that implied laws are inherently abusive and threatening without specific wording and accurate definitions. To the point of criminalizing Christianity and allowing one state to kidnap the citizens of another where they are held hostage against their own rights and religion for out of state release.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been mailed to:  
Jeanne Stratis, Assistant State Attorney, on October 13<sup>th</sup>, 2025.

  
Matthew Moulton, Defendant

FILED  
2025 OCT 17 AM 11:42  
CLERK OF THE CIRCUIT  
CITY CLERK  
VOLUSIA COUNTY, FL  
CL70

Volusia County Division of Corrections  
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