

IN THE CIRCUIT COURT IN AND FOR PINELLAS COUNTY,  
FLORIDA CASE NO. xxxx CFANO - M

STATE OF FLORIDA

vs.

D.C.

SPN 1231733

\_\_\_\_\_ /

**MOTION TO DISMISS**

Defendant, by and through his undersigned counsel, respectfully requests this Court to enter an Order dismissing Count II of the information. Defendant in the above-styled cause, and as grounds therefor would show the following:

1. The Defendant meets the conditions for Youthful Offender status as delineated in Florida Statutes Section 958.04.
2. The Defendant has no prior felony record as a juvenile nor as an adult.
2. The actions of the Defendant on the date in question resulted in no one being harmed.
3. The Defendant is truly remorseful, accepts responsibility for his actions, and understands that he will be punished.

WHEREFORE, to the best of counsel's knowledge and belief, treating the Defendant as a Youthful Offender is necessary and appropriate under the circumstances.

CERTIFICATION OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the Office of the State Attorney, P. O. Box 5028, Clearwater, Florida 34618 by regular mail this day of \_\_\_\_\_.

ROBERT L. HAMBRICK  
*Attorney for the Defendant*  
Clearwater, Florida 33760  
(813)530-9256

By: \_\_\_\_\_  
ROBERT L. HAMBRICK