

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

STATE OF FLORIDA,
Plaintiff,

CASE NUMBER: 2026-102441-CFDL

v.

LINDSEY BROOKE ISAACS,
Defendant.

**DEFENDANT'S RESPONSE TO STATE'S
MOTION FOR PRETRIAL DETENTION**

COMES NOW the Defendant, LINDSEY BROOKE ISAACS, and opposes the State's Motion for Pretrial Detention pursuant to Florida Statute § 907.041.

1. The State bears the burden of establishing a substantial probability that the Defendant committed the charged offenses and that no conditions of release can protect the community or ensure appearance. Florida Statute § 907.041(5)(d), (h).
2. The State cannot meet this burden. The identity of the driver remains unproven and is the central contested issue.
3. The State's own filings acknowledge that forensic testing is ongoing and may identify the operator, demonstrating that identity has not yet been established.
4. Speculation and future testing do not satisfy the statutory burden required for pretrial detention.
5. In its Motion for Pretrial Detention, the State relies upon the incorporation of the arrest affidavit into the Motion, yet failed to attach the same. This portion of the State's motion should be stricken.
6. Even if the Court finds a substantial probability, the State must further prove that no conditions of release are sufficient.
7. Under Florida Statute § 903.046, the Court must consider the Defendant's ties to the community, residence, and history.
8. The Defendant has strong community ties, a stable residence, and no history of failure to appear.
9. Reasonable conditions of release can address any concerns.

WHEREFORE, the Defendant respectfully requests denial of the State's motion and that bond be set.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a copy of this document was served upon the Volusia County State Attorney's Office via the Florida E-File Portal on this 21st day of April, 2026.

By:

/s/ Patrick J. McGeehan _____

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