

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CASE NO.: 20-0

STATE OF FLORIDA

v.

LAWRENCE
DOB: 10/11/1952

DEFENDANT'S MOTION TO SUPPRESS EVIDENCE

COMES NOW, Defendant, LAWRENCE SHIFRIN, by and through undersigned counsel, hereby moves this Court for the entry of an Order suppressing all evidence obtained after the illegal stop of Lawrence motor vehicle, and based upon the 4th Amendment to the United States' Constitution, the 14th Amendment to the United States' Constitution, Article 1 §12 and §23 of the Florida Constitution, and United States and Florida Case Law, and as grounds therefore states the following:

THE SURVEILLANCE

1.

On June 22, 2020, at approximately 4:00pm, Detective Michael of the Pinellas County Sheriff's Office was conducting surveillance in the vicinity of 22nd Avenue N and I-275 in St. Petersburg, Florida. (Holloway Report).

2.

The reason Detective was conducting surveillance in this area is because of the recent complaints about methamphetamine trafficking. (Report).

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