

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT,
IN AND FOR ALACHUA COUNTY, FLORIDA

STATE OF FLORIDA
Plaintiff,

vs.

CASE NUMBER: 01-2021-CF-003691-A

DIVISION I

ANDRE ABRAMS SR
Defendant.

MOTION FOR TEMPORARY FURLOUGH PURSUANT TO § 951.24, FLA. STATUTE

COMES NOW the Defendant, Andre Abrams Sr., by and through undersigned counsel, and respectfully moves this Honorable Court, pursuant to Florida Statute § 951.24, to grant a temporary furlough from the Alachua County Jail in order to attend the memorial service of his son.

As grounds, the Defendant states as follows:

1. The Defendant is presently serving a one-year sentence in the Alachua County Jail upon conviction of a single misdemeanor count of Unlawful Exhibition of a Deadly Weapon, in violation of § 790.10, Fla. Stat.
2. Florida Statute § 951.24 authorizes the Court to permit the extension of confinement limits or to grant a temporary furlough for humanitarian purposes, subject to conditions deemed appropriate by the Court.
3. The Defendant's son, Armand J. Bullard, has recently passed away. A memorial service has been scheduled in his honor on Saturday, September 6, 2025, at 10:30 a.m.
4. The service is to be held at the University City Church of Christ, 4626 NW 8th Ave, Gainesville, Florida 32605.
5. The Defendant is the biological father of the deceased and maintained a close and loving relationship with his son. His presence at the service is of significant emotional and familial importance to both himself and his grieving family.
6. The Defendant agrees to abide by all conditions imposed by this Court to ensure public safety and his prompt return to custody, including but not limited to:
 - a. Escort and supervision by law enforcement or corrections personnel;
 - b. Electronic monitoring, if deemed necessary;
 - c. Immediate return to the Alachua County Jail upon conclusion of the service;
 - d. Any time, duration, or geographic restrictions the Court may order.

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7. Given the relatively short length of the Defendant's sentence and his strong ties to the community, the Defendant is neither a flight risk nor a danger to the community.

8. The State does not oppose Defendant motion

WHEREFORE, the Defendant respectfully requests that this Honorable Court enter an Order permitting him a temporary furlough from the Alachua County Jail on Saturday, September 6, 2025, for the limited purpose of attending his son's memorial service at the University City Church of Christ in Gainesville, Florida, at 10:30 a.m., subject to such terms and conditions as the Court deems proper.

CERTIFICATE OF SERVICE

THE UNDERSIGNED CERTIFIES that a true and correct copy of the foregoing has been furnished to Pamela C. Goeckel, Assistant State Attorney, eservice@sao8.org, via E-Service, on August 28, 2025.

s/ Aubroncee S. Martin

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