

JUDICIAL NOMINATING COMMISSION

SEVENTH JUDICIAL CIRCUIT OF FLORIDA

**REDACTED APPLICATION FOR
NOMINATION TO THE CIRCUIT COURT**

JEANNE STRATIS



EDUCATION:

7. List in reverse chronological order each secondary school, college, university, law school or any other institution of higher education attended and indicate for each the dates of attendance, whether a degree was received, the date the degree was received, class standing, and graduating GPA (if your class standing or graduating GPA is unknown, please request the same from such school).

Florida Coastal School of Law
Attended August 1998 to December 2000
Juris Doctor, received December 20, 2000
Class ranking not provided by institution.
2.84 GPA

University of South Florida
Attended January 1995 to December 1997
Bachelor of Science, received December 12, 1997
Class ranking not provided by institution.
2.9 GPA

St. Petersburg Junior College
Attended August 1992 to December 1994
Associate of Arts Degree received December 16, 1994
Class ranking not provided by institution.
2.88 GPA

Gulf High School
Attended August 1988 to June 1992
High School Diploma received June 1992
Class ranking not provided by institution.
2.9 GPA

8. List and describe any organizations, clubs, fraternities or sororities, and extracurricular activities you engaged in during your higher education. For each, list any positions or titles you held and the dates of participation.

Habitat for Humanity during 2nd year of law school.

EMPLOYMENT:

9. List in reverse chronological order all full-time jobs or employment (including internships and clerkships) you have held since the age of 21. Include the name and address of the employer, job title(s) and dates of employment. For non-legal employment, please briefly describe the position and provide a business address and telephone number.

Assistant State Attorney, 7th Judicial Circuit, 101 North Alabama Avenue, Deland, FL, 32724, (386) 822-6400, May 2002-present

Associate at Williams, Wonsettler & Moore, (no longer in partnership) therefore providing current information for Douglas Williams, 120 S. Woodland Blvd., Deland, FL, 32724, (386) 258-6700, February 2002-April 2002

Assistant State Attorney, 7th Judicial Circuit, 251 North Ridgewood Ave., Daytona Beach, FL, 32114 (386) 239-7710, June 2001-January 2002

10. Describe the general nature of your current practice including any certifications which you possess; additionally, if your practice is substantially different from your prior practice or if you are not now practicing law, give details of prior practice. Describe your typical clients or former clients and the problems for which they sought your services.

My current practice is criminal prosecution, in the Career Criminal Unit (CCU), in Deland. I was just recently (December 2024) transferred from Division 08 to Division 07 and am still assigned to CCU and serve as Docket Lead for the Division 07 docket. I have been in the CCU/Docket Lead position since 2014. While in the CCU, I have been responsible for prosecuting Prison releasee reoffenders, Sex Crimes, Traffic Homicides, and Homicides. As Docket Lead, I am responsible for supervising the line attorneys on the docket and maintaining the docket in general.

Prior to being promoted to the CCU, I held many different positions within the State Attorney's Office. I spent many years in the Juvenile Division, a short time in Misdemeanor, and several years as a Felony Line Attorney.

11. What percentage of your appearance in court in the last five years or in the last five years of practice (include the dates) was:

Court		Area of Practice	
Federal Appellate	_____ %	Civil	_____ %
Federal Trial	_____ %	Criminal	<u>100</u> %
Federal Other	_____ %	Family	_____ %
State Appellate	_____ %	Probate	_____ %
State Trial	<u>100</u> %	Other	_____ %
State Administrative	_____ %		
State Other	_____ %		

TOTAL 100 %

TOTAL 100 %

If your appearance in court the last five years is substantially different from your prior practice, please provide a brief explanation: N/A

12. In your lifetime, how many (number) of the cases that you tried to verdict, judgment, or final decision were:

Jury? 72

Non-jury? Approx. 50-60

Arbitration? _____

Administrative Bodies? _____

Appellate? _____

13. Please list every case that you have argued (or substantially participated) in front of the United States Supreme Court, a United States Circuit Court, the Florida Supreme Court, or a Florida District Court of Appeal, providing the case name, jurisdiction, case number, date of argument, and the name(s), e-mail address(es), and telephone number(s) for opposing appellate counsel. If there is a published opinion, please also include that citation.

None.

14. Within the last ten years, have you ever been formally reprimanded, sanctioned, demoted, disciplined, placed on probation, suspended, or terminated by an employer or tribunal before which you have appeared? If so, please state the circumstances under which such action was taken, the date(s) such action was taken, the name(s) of any persons who took such action, and the background and resolution of such action.

No.

15. In the last ten years, have you failed to meet any deadline imposed by court order or received notice that you have not complied with substantive requirements of any business or contractual arrangement? If so, please explain full.

No.

16. For your last six cases, which were tried to verdict or handled on appeal, either before a jury, judge, appellate panel, arbitration panel or any other administrative hearing officer, list the names, e-mail addresses, and telephone numbers of the trial/appellate counsel on all sides and court case numbers (include appellate cases). *This question is optional for sitting judges who have served five years or more.*

1. **State v. Alburt L. Burns Jr. 2023 100505 CFDL**

Jonathan Mills, Counsel for the Defendant, 5300 South Orange Ave., Orlando, FL 32809

- 2. State v. Gregory Somers, 2023 100094 CFDL**
Joseph Flores and Courtney Davison, Assistant Public Defenders, Counsels for the Defendant, 101 N. Alabama Ave., 3rd Floor, Deland, FL, 32720, (386) 822-5770, flores.joseph@pd7.org and davison.courtney@pd7.org
 - 3. State v. Carmelo Perez Cruz, 2022 102185 CFDL**
Thomas Greene, Counsel for the Defendant, 319 South Elm Ave., Suite 2, Sanford, FL 32771, (407) 321-0751. greenelaw@bellsouth.net
 - 4. State v. Robert Lee Jacobs, 2021 101836 CFDL**
Justine Snow and Courtney Davison, Assistant Public Defenders, Counsels for the Defendant, 101 N. Alabama Ave., 3rd Floor, Deland, FL, 32720, (386) 822-5770, snow.justine@pd7.org and davison.courtney@pd7.org
 - 5. State v. K'veon Asun Jiles, 2021 101594 CFDL,**
Sean Landers, Counsel for the Defendant, 250 North Orange Avenue, Unit 750, Orlando, FL, 32801. sean@baezlawfirm.com
 - 6. State v. Scott McDermott, 2019 102088 CFDL,**
Donald Dempsey, with Former Associate Haley Mark, Counsels for the Defendant, 138 East Rich Avenue, Deland, FL 32724 (386) 738-1159, donalddbempsey@hotmail.com
Jonathan Mills, Co-counsel for the Defendant, 160 E. Summerlin Street #206, Bartow, FL 33830, (321) 263-6028, floridalaw2009@gmail.com.
- 17. For your last six cases, which were either settled in mediation or settled without mediation or trial, list the names and telephone numbers of trial counsel on all sides and court case numbers (include appellate cases). *This question is optional for sitting judges who have served five years or more.***
- 1. State v. Ja'Darrius Martin 2024 101795 CFDL**
Alexis Nava-Martinez, Assistant Public Defender, Counsel for the Defendant (386) 822-5770
 - 2. Kadin Powers 2023 101307 CFDL**
James Smith, Assistant Public Defender, Counsel for the Defendant (386) 822-5770
 - 3. State v. Mark Greenberg 2022 101988 CFDL and 2023 101602 CFDL**
Chris Kaigle, The Kaigle Law Firm, Counsel for the Defendant (407) 545-6416
 - 4. State v. Brandon Donato, 2023 101556 CFDL**

**James Smith, Assistant Public Defender, Counsel for the Defendant
(386) 822-5770**

**5. State v. Arnold Marchione 2021 101596 and 2023 100716 CFDL
Adam Dala, Assistant Public Defender, Counsel for the Defendant
(386) 822-5770**

**6. State v. Adrian Smith 2022 100982 CFDL
Chris Kaigle, The Kaigle Law Firm, Counsel for the Defendant
(407) 545-6416**

18. During the last five years, on average, how many times per month have you appeared in Court or at administrative hearings? If during any period you have appeared in court with greater frequency than during the last five years, indicate the period during which you appeared with greater frequency and succinctly explain.

Approximately 12-20 days per month in court.

19. If Questions 16, 17, and 18 do not apply to your practice, please list your last six major transactions or other legal matters that were resolved, listing the names, e-mail addresses, and telephone numbers of the other party counsel.

N/A

20. During the last five years, if your practice was greater than 50% personal injury, workers' compensation or professional malpractice, what percentage of your work was in representation of plaintiffs or defendants?

N/A

21. List and describe the five most significant cases which you personally litigated giving the case style, number, court and judge, the date of the case, the names, e-mail addresses, and telephone numbers of the other attorneys involved, and citation to reported decisions, if any. Identify your client and describe the nature of your participation in the case and the reason you believe it to be significant.

1. State v. Emmanuel Rosado 2016 102293 CFDL: The defendant in this case was charged with Attempted Murder of his wife, and two Law Enforcement Officers. What began as a seemingly simple domestic violence call turned into a near deadly stand-off between the defendant and Volusia County Sheriff's deputies who responded to the home. While deputies were on scene, trying to make contact with the victim and defendant, they heard gunshots and children screaming from within the home. The wife had to bail out of the front bedroom window and was dragged to safety by one of

the responding deputies, as she was unable to walk due to being shot. The defendant was firing out toward the other responding deputies as this was happening. He finally stopped firing and surrendered. Neither the defendant, nor the three small children that had been in the home to witness these events were harmed. This case demonstrates just how volatile a domestic violence situation can become, even when law enforcement is already involved.

The case went to trial in March 2018, before the Honorable R. Michael Hutcheson. Rob Rawlins was Counsel for the Defendant, (386) 255-1400.
rrawlins@communitylawfirm.com.

2. **State v. Octaviano Sandoval 2017 101004 CFDL:** This case involved a report to NCMEC of a possible live victim of sexual abuse. The investigation revealed that the defendant had been sexually abusing the victim while he recorded the abuse. He also offered videos of her to others over the internet. Investigation also revealed a large collection of child pornography that he had downloaded from the internet. This case was significant as it involved a live victim who was prey to an extremely dangerous individual very close to her, and because of the timing of the tip, she was saved from far more abuse.

The case went to trial in January 2019, before the Honorable Dawn Nichols. Joshua Mott and Courtney Davison, Assistant Public Defenders were Counsel and Co-counsel for the Defendant, (386) 822-5770.

Mott.joshua@pd7.org.

Davison.courtney@pd7.org.

3. **State v. K'veon Asun Jiles 2021 101594 CFDL:** The Defendant in this case was charged with Second Degree Murder (Firearm) and was just 16 years old at the time of the homicide. He was prosecuted under our Young Guns Initiative. The uptake in gun violence in our circuit has prompted the State Attorney's Office to label certain cases under this initiative to address the gun violence among juveniles and young adults. The Defendant used an AR-15 pistol that had been stolen from a vehicle at the Seminole Hard Rock Casino in Tampa several months before the homicide. The victim identified Jiles as the person who shot him just before he died. The case went to trial in June 2023 before the honorable Dawn Nichols, and the Defendant was convicted as charged. He was sentenced to 50 years in Florida State Prison, including a 25 year minimum mandatory pursuant to 10-20-Life, and he will be up for review in 25 years pursuant to statute based on his age at the time of the offense.

Sean Landers was Counsel for the Defendant, (407) 705-2626.

Sean@baezlawfirm.com

4. **State v. Kendall Rockmore 2017 103719 CFDL:** The Defendant in this case had been released from prison, and on supervised probation for about two months before the crimes occurred. He was charged with Robbery With A Firearm, four counts of Kidnapping, Possession of a Firearm by Convicted Felon, and later with one count of Harassing a Witness. He appeared at a local pharmacy one evening at closing time

wearing sunglasses to conceal his face, and firearm in hand, to rob the pharmacy of narcotics. He locked the three female pharmacy technicians (one of whom was eight months pregnant) in the trunks of two cars, while he forced the pharmacist into the building to have him turn over narcotics. He had been driven and dropped off near the pharmacy by a sister that he reached out to upon his release from prison. She eventually became a State witness and the Defendant made threats against her that almost stopped her from testifying at trial. This case had a multitude of evidentiary issues, last minute motion hearings, and enhanced sentencing based on his PRR status, which exposed the Defendant to a mandatory life sentence.

The case was tried in December 2019, before the Honorable Dawn Nichols. Cassie Rex, Former Assistant Public Defender, Counsel for the Defendant, (303) 285-0537, cassie.rex@coloradodefenders.us.

5. **State v. Taylor Forrest 2019 101312 CFDL:** This Defendant was found to have been sexually abusing small children close to him. He had flown down for a birthday party for one of the children and while here, sent images of them over the internet, and offered them to others for sexual gratification. One of the people he was chatting with online reported this to law enforcement and we were able to put a stop to the abuse. During the investigation a large quantity of child pornography was found in his possession, and he admitted to abusing the children. During our investigation we also learned that the state of New York had a report of him abusing a child there, but that investigation had not progressed by the time we arrested the Defendant. This case was resolved through plea negotiations.

Justine Snow, Assistant Public Defenders were Counsel and Co-counsel for the Defendant, (386) 822-5770.

Snow.justine@pd7.org

22. Attach at least two, but no more than three, examples of legal writing which you personally wrote. If you have not personally written any legal documents recently, you may attach a writing sample for which you had substantial responsibility. Please describe your degree of involvement in preparing the writing you attached.

I personally prepared both writing samples attached to this application.

PRIOR JUDICIAL EXPERIENCE OR PUBLIC OFFICE

23. Have you ever held judicial office or been a candidate for judicial office? If so, state the court(s) involved, the dates of service or dates of candidacy, and any election results.

No.

24. If you have previously submitted a questionnaire or application to this or any other judicial nominating commission, please give the name(s) of the commission, the approximate date(s) of

each submission, and indicate if your name was certified to the Governor's Office for consideration.

I submitted an application to the Seventh Circuit JNC in July 2012. My name was not certified to the Governor's Office.

I submitted an application to the Seventh Circuit JNC in February 2022. My name was not certified to the Governor's Office.

I submitted an application to the Seventh Circuit JNC in January 2023. My name was not certified to the Governor's Office.

I submitted an application to the Seventh Circuit JNC in September 2023. My name was certified to the Governor's Office.

I submitted an application to the Seventh Circuit JNC in January 2024. My name was not certified to the Governor's Office.

I submitted an application to the Seventh Circuit JNC in March 2024. My name was not certified to the Governor's Office.

I submitted an application to the Seventh Circuit JNC in February 2025. My name was certified to the Governor's Office.

25. List any prior quasi-judicial service, including the agency or entity, dates of service, position(s) held, and a brief description of the issues you heard.

N/A

26. If you have prior judicial or quasi-judicial experience, please list the following information:

- (i) the names, phone numbers and addresses of six attorneys who appeared before you on matters of substance;
- (ii) the approximate number and nature of the cases you handled during your tenure;
- (iii) the citations of any published opinions; and
- (iv) descriptions of the five most significant cases you have tried or heard, identifying the citation or style, attorneys involved, dates of the case, and the reason you believe these cases to be significant.

N/A

27. Provide citations and a brief summary of all of your orders or opinions where your decision was reversed by a reviewing court or where your judgment was affirmed with significant criticism of

your substantive or procedural rulings. If any of the opinions listed were not officially reported, attach copies of the opinions.

N/A

28. Provide citations for significant opinions on federal or state constitutional issues, together with the citation to appellate court rulings on such opinions. If any of the opinions listed were not officially reported, attach copies of the opinions.

N/A

29. Has a complaint about you ever been made to the Judicial Qualifications Commission? If so, give the date, describe the complaint, whether or not there was a finding of probable cause, whether or not you have appeared before the Commission, and its resolution.

N/A

30. Have you ever held an attorney in contempt? If so, for each instance state the name of the attorney, case style for the matter in question, approximate date and describe the circumstances.

N/A

31. Have you ever held or been a candidate for any other public office? If so, state the office, location, dates of service or candidacy, and any election results.

N/A

NON-LEGAL BUSINESS INVOLVEMENT

32. If you are now an officer, director, or otherwise engaged in the management of any business enterprise, state the name of such enterprise, the nature of the business, the nature of your duties, and whether you intend to resign such position immediately upon your appointment or election to judicial office.

N/A

33. Since being admitted to the Bar, have you ever engaged in any occupation, business or profession other than the practice of law? If so, explain and provide dates. If you received any compensation of any kind outside the practice of law during this time, please list the amount of compensation received.

N/A

POSSIBLE BIAS OR PREJUDICE

34. The Commission is interested in knowing if there are certain types of cases, groups of entities, or extended relationships or associations which would limit the cases for which you could sit as the

presiding judge. Please list all types or classifications of cases or litigants for which you, as a general proposition, believe it would be difficult for you to sit as the presiding judge. Indicate the reason for each situation as to why you believe you might be in conflict. If you have prior judicial experience, describe the types of cases from which you have recused yourself.

N/A

PROFESSIONAL ACCOMPLISHMENTS AND OTHER ACTIVITIES

35. List the titles, publishers, and dates of any books, articles, reports, letters to the editor, editorial pieces, or other published materials you have written or edited, including materials published only on the Internet. Attach a copy of each listed or provide a URL at which a copy can be accessed.

N/A

36. List any reports, memoranda or policy statements you prepared or contributed to the preparation of on behalf of any bar association, committee, conference, or organization of which you were or are a member. Provide the name of the entity, the date published, and a summary of the document. To the extent you have the document, please attach a copy or provide a URL at which a copy can be accessed.

N/A

37. List any speeches or talks you have delivered, including commencement speeches, remarks, interviews, lectures, panel discussions, conferences, political speeches, and question-and-answer sessions. Include the date and place they were delivered, the sponsor of the presentation, and a summary of the presentation. If there are any readily available press reports, a transcript or recording, please attach a copy or provide a URL at which a copy can be accessed.

1. Interviewed by ID Discovery regarding the case of State v. Emmanuel Rosado as part of their series entitled Bodycam in June 2018. The series began running in November 2018.
[Body Cam - S1 E2 Shots Fired - ID GO \(investigationdiscovery.com\)](#)

2. Case presentation on State v. Fred Harvey at the Internet Crimes Against Children Winter Conference December 2019.

3. Spoke at the Basic Crime Scene class for law enforcement, at Daytona State College in August 2021. The presentation was designed to give law enforcement/crime scene investigators some insight into the courtroom side of the criminal justice system. We went through how to present in court, how their investigation is presented during hearings and trials.

4. Spoke at the Volusia Sheriff's Office Academy at the Volusia Sheriff's Office Training Center June 2022. The presentation was designed to give law enforcement/crime scene

investigators some insight into the courtroom side of the criminal justice system. We went through examples of what to do, and what not to do, and why. We also went through how to present in court and how hearings and trials are conducted, including some mock trial exercises.

5. Assisted with and spoke at the Stetson University Mock Trial Competition in June 2022 at Stetson University. The students attending the mock trial camp practiced their trial presentations including opening statement, direct and cross examinations, and closing statements. I helped them with some tips and strategies, and then had a question and answer period after their presentations.

6. Spoke at the Volusia Sheriff's Office Academy at the Volusia Sheriff's Office Training Center January 2023. The presentation was designed to give law enforcement/crime scene investigators some insight into the courtroom side of the criminal justice system. We went through examples of what to do, and what not to do, and why. We also went through how to present in court and how hearings and trials are conducted, including some mock trial exercises.

7. Spoke at the Volusia Sheriff's Office Academy at the Volusia Sheriff's Office Training Center May 2023. The presentation was designed to give law enforcement/crime scene investigators some insight into the courtroom side of the criminal justice system. We went through examples of what to do, and what not to do, and why. We also went through how to present in court and how hearings and trials are conducted, including some mock trial exercises.

8. Assisted with and spoke at the Stetson University Mock Trial Competition in June 2023 at Stetson University. This year was a bit different and was more of a question and answer session for an afternoon where the students asked questions about my career as a prosecutor and the practice of law in general.

9. Mock Trial Training with the Volusia Sheriff's Office, October 16-17, 2023. The presentation started with a discussion of how cases progress through the court system, and then what to expect when it comes to trial. Then, put each attendee on the witness stand and went through direct and cross examination questions.

10. Spoke at the Volusia Sheriff's Office Academy at the Volusia Sheriff's Office Training Center January 2024. The presentation was designed to give law enforcement/crime scene investigators some insight into the courtroom side of the criminal justice system. We went through examples of what to do, and what not to do, and why. We also went through how to present in court and how hearings and trials are conducted, including some mock trial exercises.

11. Spoke at the FPAA Felony Transition Bootcamp April 2024. Spoke to new felony attorneys and attorneys getting ready to move to felony about cases involving firearms.

12. Spoke to the Orange City Police Department at the Medical Examiner's Office, August 27 and 29, 2024. The presentation was designed to give law enforcement some insight into the courtroom side of the criminal justice system. We went through examples of what to do, and what not to do, and why.

13. Spoke at the FPAA Felony Transition Bootcamp April 2025. Spoke to new felony attorneys and attorneys getting ready to move to felony about cases involving firearms.

14. Spoke to the Volusia Sheriff's Office Training Academy Case Prep and Court Presentation Class in June 2025. The presentation was designed to give law enforcement/crime scene investigators some insight into the courtroom side of the criminal justice system. We went through examples of what to do, and what not to do, and why. We also went through how to present in court and how hearings and trials are conducted, including some mock trial exercises.

38. Have you ever taught a course at an institution of higher education or a bar association? If so, provide the course title, a description of the course subject matter, the institution at which you taught, and the dates of teaching. If you have a syllabus for each course, please provide.

N/A

39. List any fellowships, honorary degrees, academic or professional honors, honorary society memberships, military awards, and any other special recognition for outstanding service or achievement. Include the date received and the presenting entity or organization.

**Rookie of the Year Award from the Rotary Club of Deland, June 2024.
Paul Harris Fellow from the Rotary Club of Deland, June 2025.**

40. Do you have a Martindale-Hubbell rating? If so, what is it and when was it earned?

No.

41. List all bar associations, legal, and judicial-related committees of which you are or have been a member. For each, please provide dates of membership or participation. Also, for each indicate any office you have held and the dates of office.

N/A

42. List all professional, business, fraternal, scholarly, civic, charitable, or other organizations, other than those listed in the previous question to which you belong, or to which you have belonged since graduating law school. For each, please provide dates of membership or participation and indicate any office you have held and the dates of office.

Inns of Court, November 2021-present.
Volusia County Bar Association 2022- present.
Rotary Club of Deland August 2023- present.

43. Do you now or have you ever belonged to a club or organization that in practice or policy restricts (or restricted during the time of your membership) its membership on the basis of race, religion (other than a church, synagogue, mosque or other religious institution), national origin, or sex (other than an educational institution, fraternity or sorority)? If so, state the name and nature of the club(s) or organization(s), relevant policies and practices and whether you intend to continue as a member if you are selected to serve on the bench.

N/A

44. Please describe any significant pro bono legal work you have done in the past 10 years, giving dates of service.

N/A

45. Please describe any hobbies or other vocational interests.

I enjoy baking, traveling, organizing Rotary events, and working out.

46. Please state whether you have served or currently serve in the military, including your dates of service, branch, highest rank, and type of discharge.

N/A

47. Please provide links to all social media and blog accounts you currently maintain, including, but not limited to, Facebook, Twitter, LinkedIn, and Instagram.

<https://www.facebook.com/jeanne.stratis>

[Jeanne Stratis \(@teeniejeanne\) • Instagram photos and videos](#)

FAMILY BACKGROUND

48. Please state your current marital status. If you are currently married, please list your spouse's name, current occupation, including employer, and the date of the marriage. If you have ever been divorced, please state for each former spouse their name, current address, current telephone number, the date and place of the divorce and court and case number information.

Single.

49. If you have children, please list their names and ages. If your children are over 18 years of age, please list their current occupation, residential address, and a current telephone number.

N/A

CRIMINAL AND MISCELLANEOUS ACTIONS

50. Have you ever been convicted of a felony or misdemeanor, including adjudications of guilt withheld? If so, please list and provide the charges, case style, date of conviction, and terms of any sentence imposed, including whether you have completed those terms.

No

51. Have you ever pled nolo contendere or guilty to a crime which is a felony or misdemeanor, including adjudications of guilt withheld? If so, please list and provide the charges, case style, date of conviction, and terms of any sentence imposed, including whether you have completed those terms.

No

52. Have you ever been arrested, regardless of whether charges were filed? If so, please list and provide sufficient details surrounding the arrest, the approximate date and jurisdiction.

No

53. Have you ever been a party to a lawsuit, either as the plaintiff, defendant, petitioner, or respondent? If so, please supply the case style, jurisdiction/county in which the lawsuit was filed, case number, your status in the case, and describe the nature and disposition of the matter.

N/A

54. To your knowledge, has there ever been a complaint made or filed alleging malpractice as a result of action or inaction on your part?

No

55. To the extent you are aware, have you or your professional liability carrier ever settled a claim against you for professional malpractice? If so, give particulars, including the name of the client(s), approximate dates, nature of the claims, the disposition and any amounts involved.

N/A

56. Has there ever been a finding of probable cause or other citation issued against you or are you presently under investigation for a breach of ethics or unprofessional conduct by any court,

administrative agency, bar association, or other professional group. If so, provide the particulars of each finding or investigation.

No

57. To your knowledge, within the last ten years, have any of your current or former co-workers, subordinates, supervisors, customers, clients, or the like, ever filed a formal complaint or accusation of misconduct including, but not limited to, any allegations involving sexual harassment, creating a hostile work environment or conditions, or discriminatory behavior against you with any regulatory or investigatory agency or with your employer? If so, please state the date of complaint or accusation, specifics surrounding the complaint or accusation, and the resolution or disposition.

No

58. Are you currently the subject of an investigation which could result in civil, administrative, or criminal action against you? If yes, please state the nature of the investigation, the agency conducting the investigation, and the expected completion date of the investigation.

No

59. Have you ever filed a personal petition in bankruptcy or has a petition in bankruptcy been filed against you, this includes any corporation or business entity that you were involved with? If so, please provide the case style, case number, approximate date of disposition, and any relevant details surrounding the bankruptcy

No

60. In the past ten years, have you been subject to or threatened with eviction proceedings? If yes, please explain.

No

61. Please explain whether you have complied with all legally required tax return filings. To the extent you have ever had to pay a tax penalty or a tax lien was filed against you, please explain giving the date, the amounts, disposition, and current status.

I have complied with all tax return filings.

HEALTH

62. Are you currently addicted to or dependent upon the use of narcotics, drugs, or alcohol?

No

63. During the last ten years have you been hospitalized or have you consulted a professional or have you received treatment or a diagnosis from a professional for any of the following: Kleptomania, Pathological or Compulsive Gambling, Pedophilia, Exhibitionism or Voyeurism? If your answer is yes, please direct each such professional, hospital and other facility to furnish the Chairperson of the Commission any information the Commission may request with respect to any such hospitalization, consultation, treatment or diagnosis. ["Professional" includes a Physician, Psychiatrist, Psychologist, Psychotherapist or Mental Health Counselor.] Please describe such treatment or diagnosis.

No

64. In the past ten years have any of the following occurred to you which would interfere with your ability to work in a competent and professional manner: experiencing periods of no sleep for two or three nights, experiencing periods of hyperactivity, spending money profusely with extremely poor judgment, suffering from extreme loss of appetite, issuing checks without sufficient funds, defaulting on a loan, experiencing frequent mood swings, uncontrollable tiredness, falling asleep without warning in the middle of an activity. If yes, please explain.

No

65. Do you currently have a physical or mental impairment which in any way limits your ability or fitness to properly exercise your duties as a member of the Judiciary in a competent and professional manner? If yes please explain the limitation or impairment and any treatment, program or counseling sought or prescribed.

No

66. During the last ten years, have you ever been declared legally incompetent or have you or your property been placed under any guardianship, conservatorship or committee? If yes, provide full details as to court, date, and circumstances.

No

67. During the last ten years, have you unlawfully used controlled substances, narcotic drugs, or dangerous drugs as defined by Federal or State laws? If your answer is "Yes," explain in detail. (Unlawful use includes the use of one or more drugs and/or the unlawful possession or distribution of drugs. It does not include the use of drugs taken under supervision of a licensed health care professional or other uses authorized by Federal or State law provisions.)

No

68. In the past ten years, have you ever been reprimanded, demoted, disciplined, placed on probation, suspended, cautioned, or terminated by an employer as result of your alleged consumption of alcohol, prescription drugs, or illegal drugs? If so, please state the circumstances

under which such action was taken, the name(s) of any persons who took such action, and the background and resolution of such action.

No

69. Have you ever refused to submit to a test to determine whether you had consumed and/or were under the influence of alcohol or drugs? If so, please state the date you were requested to submit to such a test, the type of test required, the name of the entity requesting that you submit to the test, the outcome of your refusal, and the reason why you refused to submit to such a test.

No

70. In the past ten years, have you suffered memory loss or impaired judgment for any reason? If so, please explain in full.

No

SUPPLEMENTAL INFORMATION

71. Describe any additional education or experiences you have which could assist you in holding judicial office.

N/A

72. Explain the particular contribution you believe your selection would bring to this position and provide any additional information you feel would be helpful to the Commission and Governor in evaluating your application.

As an Assistant State Attorney I have had the benefit of spending the majority of my career in a courtroom. I have been assigned to several dockets, including juvenile, misdemeanor, and felony, and have held a position in our Career Criminal Unit (CCU) for over 10 years. I've shown a commitment to serving and protecting the public that would continue should I be blessed enough to become a judge.

I have had the opportunity to be a lead on several of the dockets I have been assigned to, as well as sometimes be the only attorney assigned to a docket. This has given me the opportunity to learn very quickly how to run and maintain an efficient yet effective docket. I have also had the opportunity to lead our newer attorneys and help them grow as Assistant State Attorneys.

REFERENCES

73. List the names, addresses, e-mail addresses and telephone numbers of ten persons who are in a position to comment on your qualifications for a judicial position and of whom inquiry may be made by the Commission and the Governor.

1. James R. Clayton, 1210 Carter Road, Deland, FL 32724, (386) 801-5153, jrclyntonlaw@yahoo.com.
2. Honorable Judge Dawn Nichols, 7th Judicial Circuit, 1769 E. Moody Blvd., Bunnell, FL 32110, (386) 313-4510, dnichols@circuit7.org.
3. Ed Denston, Executive Secretary of the Rotary Club of Deland, 730 Hazen Road, Deland, FL 32720, (386) 801-7226, edenston@aol.com.
4. Chastity Burke, Volusia County School Board, 200 N. Clara Ave., Deland, FL, 32720, (386) 956-9864, cmburke1@volusia.k12.fl.us.
5. Deputy Steven Wells, Volusia Sheriff's Office, 101 North Alabama Avenue, Deland, FL, 32724 (386) 747-9728, swells@veso.us.
6. Courtney Davison, Office of the Public Defender 7th Judicial Circuit, Assistant Public Defender, 1769 E. Moody Blvd., Bldg. 1, Bunnell, FL 32110, (386) 313-4545, davison.courtney@pd7.org
7. Camile Martin, 847 Orange Ave., Suite E, Daytona Beach, FL 32114, (386) 597-9904, camille@martinlaw.org.
8. Chris Teague, 1211 Melissa Drive, Port Orange, FL, 32129, (386) 562-7327, cteague23@gmail.com.
9. Boone Forkner, Office of the State Attorney 7th Judicial Circuit, assistant State Attorney, 251 North Ridgewood Avenue, Daytona Beach, FL, 32114, (719) 221-4950, forknerb@sao7.org.
10. Justine Snow, Office of the Public Defender 7th Judicial Circuit, Assistant Public Defender, 101 North Alabama Ave., Deland, FL 32724, (386) 822-5770, snow.justine@pd7.org.

CERTIFICATE

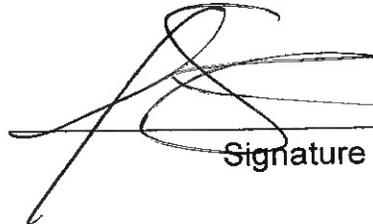
I have read the foregoing questions carefully and have answered them truthfully, fully and completely. I hereby waive notice by and authorize The Florida Bar or any of its committees, educational and other institutions, the Judicial Qualifications Commission, the Florida Board of Bar Examiners or any judicial or professional disciplinary or supervisory body or commission, any references furnished by me, employers, business and professional associates, all governmental agencies and instrumentalities and all consumer and credit reporting agencies to release to the respective Judicial Nominating Commission and Office of the Governor any information, files, records or credit reports requested by the commission in connection with any consideration of me as possible nominee for appointment to judicial office. Information relating to any Florida Bar disciplinary proceedings is to be made available in accordance with Rule 3-7.1(l), Rules Regulating The Florida Bar. I recognize and agree that, pursuant to the Florida Constitution and the Uniform Rules of this commission, the contents of this questionnaire and other information received from or concerning me, and all interviews and proceedings of the commission, except for deliberations by the commission, shall be open to the public.

Further, I stipulate I have read, and understand the requirements of the Florida Code of Judicial Conduct.

Dated this 23 day of June, 20 20.

Jean M. Stratis

Printed Name



Signature

(Pursuant to Section 119.071(4)(d)(1), F.S.), . . . The home addresses and telephone numbers of justices of the Supreme Court, district court of appeal judges, circuit court judges, and county court judges; the home addresses, telephone numbers, and places of employment of the spouses and children of justices and judges; and the names and locations of schools and day care facilities attended by the children of justices and judges are exempt from the provisions of subsection (1), dealing with public records.

FINANCIAL HISTORY

1. State the amount of gross income you have earned, or losses you have incurred (before deducting expenses and taxes) from the practice of law for the preceding three-year period. This income figure should be stated on a year to year basis and include year to date information, and salary, if the nature of your employment is in a legal field.

Current Year-To-Date: \$78,000

Last Three Years: (2024) \$147,522 (2023) \$134,139 (2022) \$101,864.00

2. State the amount of net income you have earned, or losses you have incurred (after deducting expenses but not taxes) from the practice of law for the preceding three-year period. This income figure should be stated on a year to year basis and include year to date information, and salary, if the nature of your employment is in a legal field.

Current Year-To-Date: \$55,686

Last Three Years: (2024)\$139,476 (2023) \$94,276 (2022) \$88,929.00

3. State the gross amount of income or losses incurred (before deducting expenses or taxes) you have earned in the preceding three years on a year by year basis from all sources other than the practice of law, and generally describe the source of such income or losses.

Current Year-To-Date: N/A

Last Three Years: N/A N/A N/A

4. State the amount you have earned in the preceding three years on a year by year basis from all sources other than the practice of law, and generally describe the source of such income or losses.

Current Year-To-Date: N/A

Last Three Years: N/A N/A N/A

5. State the amount of net income you have earned or losses incurred (after deducting expenses) from all sources other than the practice of law for the preceding three-year period on a year by year basis, and generally describe the sources of such income or losses.

Current Year-To-Date: N/A

Last Three Years: N/A N/A N/A

**FORM 6
FULL AND PUBLIC
DISCLOSURE OF
FINANCIAL INTEREST**

PART A – NET WORTH

Please enter the value of your net worth as of December 31 or a more current date. [Note: Net worth is not calculated by subtracting your *reported* liabilities from your *reported* assets, so please see the instructions on page 3.]

My net worth as of February 10, 2025 was \$ 378,748.

PART B - ASSETS

HOUSEHOLD GOODS AND PERSONAL EFFECTS:

Household goods and personal effects may be reported in a lump sum if their aggregate value exceeds \$1,000. This category includes any of the following, if not held for investment purposes; jewelry; collections of stamps, guns, and numismatic items; art objects; household equipment and furnishings; clothing; other household items; and vehicles for personal use.

The aggregate value of my household goods and personal effects (described above) is ~~Approx~~ \$20,000.00

ASSETS INDIVIDUALLY VALUED AT OVER \$1,000:

DESCRIPTION OF ASSET (specific description is required – see instructions p. 3)	VALUE OF ASSET
Residence	\$200,000
457(b) Plan	\$66,000
██████████ Checking Account	\$2,400.00
██████████ Account	\$185,000.00

PART C - LIABILITIES

LIABILITIES IN EXCESS OF \$1,000 (See instructions on page 4):

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY
██████████ Mortgage	\$74,652

JOINT AND SEVERAL LIABILITIES NOT REPORTED ABOVE:

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY
N/A	

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PART D - INCOME

You may ***EITHER*** (1) file a complete copy of your latest federal income tax return, *including all W2's, schedules, and attachments*, ***OR*** (2) file a sworn statement identifying each separate source and amount of income which exceeds \$1,000 including secondary sources of income, by completing the remainder of Part D, below.

I elect to file a copy of my latest federal income tax return and all W2's, schedules, and attachments.
 (if you check this box and attach a copy of your latest tax return, you need not complete the remainder of Part D.)

PRIMARY SOURCE OF INCOME (See instructions on page 5):

NAME OF SOURCE OF INCOME EXCEEDING \$1,000	ADDRESS OF SOURCE OF INCOME	AMOUNT
State of Florida, Office of State Attorney 7 th Judicial Circuit	101 N. Alabama Ave. Deland, FL 32724	\$147,522

SECONDARY SOURCES OF INCOME [Major customers, clients, etc., of businesses owned by reporting person—see instructions on page 6]

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS' INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE
N/A			

PART E -- INTERESTS IN SPECIFIC BUSINESS [Instructions on page 7]

	BUSINESS ENTITY #1	BUSINESS ENTITY #2	BUSINESS ENTITY #3
NAME OF BUSINESS ENTITY	N/A		
ADDRESS OF BUSINESS ENTITY			
PRINCIPAL BUSINESS ACTIVITY			
POSITION HELD WITH ENTITY			
I OWN MORE THAN A 5% INTEREST IN THE BUSINESS			
NATURE OF MY OWNERSHIP INTEREST			

IF ANY OF PARTS A THROUGH E ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE

OATH

I, the person whose name appears at the beginning of this form, do depose on oath or affirmation and say that the information disclosed on this form and any attachments hereto is true, accurate, and complete.

STATE OF FLORIDA

COUNTY OF Volusia

Sworn to (or affirmed) and subscribed before me this 23 day of June, 2025 by _____

[Handwritten Signature]
 (Signature of Notary Public—State of Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public
KATHERINE KOKESH
 Commission # HH 524905
 Expires May 11, 2028
 Personally Known _____
 OR Produced Identification _____

[Handwritten Signature]
 SIGNATURE

Type of Identification Produced _____

JUDICIAL APPLICATION DATA RECORD

The judicial application shall include a separate page asking applicants to identify their race, ethnicity and gender. Completion of this page shall be optional, and the page shall include an explanation that the information is requested for data collection purposes in order to assess and promote diversity in the judiciary. The chair of the Commission shall forward all such completed pages, along with the names of the nominees to the JNC Coordinator in the Governor's Office (pursuant to JNC Uniform Rule of Procedure).

(Please Type or Print)

Date: 6-23-2025

JNC Submitting To: Seventh Judicial Circuit

Name (please print): Jeann Stralis
Current Occupation: Assistant State Attorney
Telephone Number: (396) 233-0243 Attorney No.: 0479004

- Gender (check one): Male Female
Ethnic Origin (check one): White, non-Hispanic
 Hispanic
 Black
 American Indian/Alaskan Native
 Asian/Pacific Islander

County of Residence: Volusia

FLORIDA DEPARTMENT OF LAW ENFORCEMENT

DISCLOSURE PURSUANT TO THE
FAIR CREDIT REPORTING ACT (FCRA)

The Florida Department of Law Enforcement (FDLE) may obtain one or more consumer reports, including but not limited to credit reports, about you, for employment purposes as defined by the Fair Credit Reporting Act, including for determinations related to initial employment, reassignment, promotion, or other employment-related actions.

CONSUMER'S AUTHORIZATION FOR
FDLE TO OBTAIN CONSUMER REPORT(S)

I have read and understand the above Disclosure. I authorize the Florida Department of Law Enforcement (FDLE) to obtain one or more consumer reports on me, for employment purposes, as described in the above Disclosure.

Seamus Gratias

Printed Name of Applicant

Signature of Applicant

Date:

6-23-25

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

CASE NO: 2019 101082 CFDL

STATE OF FLORIDA

VS.

WADE LEON MCKEEHAN,
DEFENDANT.

STATE'S RESPONSE TO DEFENDANT'S MEMORANDUM OF LAW

COMES NOW, R.J. Larizza, State Attorney for the Seventh Judicial Circuit, through the undersigned Assistant State Attorney, and files this Response to Defendant's Memorandum of Law filed January 19, 2022.

In his Memorandum, the defendant first argues lack of jurisdiction. The defendant argues that the Judge Mary Jolley, Circuit Judge for the Seventh Judicial Circuit of Florida, who signed the search warrant order, does not have jurisdiction to sign a search warrant order for Google, since Google is based in California. His argument centers around Chapter 933 of the Florida Statutes, specifically 933.01. He also cites to *Harvey v. Drake*, 40 So.2d 214 (Fla. 1949). The defendant also references the cites within the search warrant order, specifically, Chapter 121 United States Code, Section 2703. In quoting Section 2703, he emphasizes the line referencing the State court authority, and the last line referencing a court of competent jurisdiction.

However, defendant's argument on lack of jurisdiction is invalid because it is not based on the proper Florida Statutes, specifically Chapter 934 entitled Security of Communications; Surveillance. Chapter 934 governs the issuance of search warrants and subpoenas for electronic communications.

Section 934.02(8) defines a Judge of competent jurisdiction as follows:

"Judge of competent jurisdiction" means justice of the Supreme Court, judge of a district court of appeal, circuit judge, or judge of any court, of record having felony jurisdiction of the State of Florida, irrespective of the geographic location or jurisdiction where the judge presides.

Additionally, Section 934.23 very closely mirrors that of Title 18 U.S. Code Section 2703, and includes the language regarding a court of competent jurisdiction.

“As used in this section, the term ‘a court of competent jurisdiction’ means a court that has jurisdiction over the investigation or that is otherwise authorized by law. An investigator or law enforcement officer may require the disclosure by a provider of electronic communication services of the contents of a wire or electronic communication that has been in electronic storage in an electronic communication system for more than 180 days by the means available in subsection (2).

The investigation was based in Volusia County, Florida, because the suspect was believed to reside in Volusia County, Florida. Clearly, Judge Jolley meets the definition of a court of competent jurisdiction under the relevant statute. As with any case of this nature, there will always be at least two computers involved, if not more. The fact that one of them appeared to be in Volusia County gave rise to the investigation in Volusia County.

The defendant next argues that the search warrant was overbroad in the description of items sought. Interestingly, he does not actually quote the affidavit in arguing it is overbroad. He picks out parts of the 5 paragraphs that specifically describe what is being sought. The affidavit for search warrant and accompanying order contain the following language:

1. Any and all information pertaining to the Google account with email address rangerwade15@gmail.com, including but not limited to: all information pertaining to the account holder such as name, address, payment information, date/time account was modified and the dates and times images/videos were uploaded;
2. All contents of the account, including: the log files, if any, pertaining to postings to Google mail, Google drive, Picasa, Google +, Google + Photos, Blogger, Google + Posts/Comments, Google Groups, Google Open Gallery, Google Voice, Google Sites, YouTube, and Orkut;
3. All subscriber and/or user information including the name, addresses, account status, all e-mail addresses, alternative e-mail addresses, cellular, home, and business addresses, and phone numbers pertaining to the account users;
4. All photoprint or video information including; photos and videos uploaded by the user as well as all photos and videos downloaded by any user which have the user

tagged in them, current, deleted, and preserved content, all sent e-mails, received e-mails, trash and spam, pictures, images, media;

5. Archived message posts along with all records relating to the activities of the account members, as reflected in the account activities log.

The defendant's argument is invalid as it does not reflect the very detailed 5 paragraphs of specific items sought in the affidavit and accompanying order.

Lastly, the defendant argues lack of probable cause in his Memorandum. He claims the cyber tip received by NCMEC, and passed on to the Volusia Sheriff's Office only rose to reasonable suspicion, rather than probable cause. He cites to *State v. Woldridge*, 958 So.2d 455 (Fla. 2nd DCA 2007), in which the court held that a search warrant based on a tip from an internet service provider to NCMEC would be enough to meet the standard for probable cause. The court noted that AOL was the only tipster, and complying with the federal law that required them to report Woldridge's activities to NCMEC provided a presumption of reliability akin to a citizen informant. The court further held that the affidavit thus provided probable cause. *Id* at 458-459. The defendant's argument is contrary to the case law cited in his own Memorandum and Motion to Suppress.

What is even more important to note, is that many other courts have cited the *Woldridge* case on this very issue. In *State v. Cook*, 972 So.2d 958 (Fla. 5th DCA 2007), law enforcement was tipped off by a neighbor of Cook's, and the court held that the neighbor was a citizen informant, and his reliability was therefore presumed. *State v. Maynard*, 782 So.2d 226, 230 (Fla. 2001; *State v. Woldridge*, 958 So.2d 455, 459 (Fla. 2nd DCA 2007); *State v. Vallone*, 868 So.2d 1278 1279-80 (Fla. 4th DCA 2004). *Id* at 959.

In *Manzione v. State*, 312 Ga. App 638 (2011), the Court of Appeals of Georgia also cited *Woldridge* on this issue. In that case, Yahoo forwarded a tip to NCMEC, and a search warrant was obtained based on that forwarded information. *Id* at 638. The Georgia appellate court distinguished an earlier case of theirs relied upon by *Manzione* and cited, among other cases, *Woldridge*. *Id* at 641-642.

In *James v. State*, 312 Ga. App 130 (2011), which is the case distinguished by the court in *Manzione*, the court noted that the search warrant affidavit containing the information provided by Google, who was in the position of a citizen informant, was valid. *Id* at 134. *James* also cited to *Woldridge* on this issue. *Id*.

In *Wisconsin v. Silverstein*, 378 Wis.2d 42 (2017) the Court of Appeals of Wisconsin held that Tumblr was also an ESP under federal mandate to report suspected child abuse to NCMEC. *Id* at 557. In so doing, the court cited *Woldridge*. *Id* at 557-558.

Most recently, the Court of Criminal Appeals of Alabama cited to *Woldridge*, holding that an internet website operator would be presumed reliable, an issue that had not yet been addressed by Alabama at that time. *Adams v. State*, 316 So.3d 260, 264-266 (2020).

On page 6 of his Memorandum, after citing *Woldridge*, the defendant continues to claim that the tip provided by an internet service provider falls short of the standard of probable cause. He goes on to argue that further investigation was necessary to give Detective Burke probable cause for the search warrant affidavit. Clearly this argument is invalid based on *Woldridge* and its progeny.

He goes on to argue that there were omissions in the affidavit regarding additional research done by Detective Burke, and the reliability of resources she used. This is irrelevant. He goes on to testify about some "independent investigation" he performed, and mischaracterize statements made in deposition by Detective Burke. This will be addressed further during the hearing, after the proper testimony is put on the record, as it is well established that what the attorneys say is not evidence.

Counsel's misunderstanding or misreading of the applicable law regarding searches of stored wire and electronic communications is not well-founded.

He then moves on to argue that Detective Burke omitted facts that would have not been favorable to the probable cause in her affidavit. Again, he mischaracterizes her deposition testimony, and this will be further argued during the hearing after the proper testimony is made part of the record. However, it is important to note that since the tip from the citizen informant, in our case Google, is sufficient to establish probable cause based on *Woldridge* and its progeny, this argument is still invalid. Even if the alleged omissions were included in the affidavit, they do not defeat the probable cause contained within the tip from Google. He continues to circle back around to the notion that additional investigation was required to reach probable cause, despite the controlling authority to the contrary.

WHEREFORE, the State requests that the defendant's Motion to Suppress dated October 28, 2021, be denied.

s/JEANNE STRATIS
ASSISTANT STATE ATTORNEY
ESERVICEVOLUSIA@SAO7.ORG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy hereof has been furnished by mail/delivery to the Honorable JAMES R CLAYTON, and to JEFFERY HIGGINS, 444 SEABREEZE BOULEVARD, SUITE 470, DAYTONA BEACH, FL 32118, on January 23, 2022.

s/JEANNE STRATIS
ASSISTANT STATE ATTORNEY
Florida Bar No.: 0479004
101 NORTH ALABAMA AVENUE
DELAND, FL 32724
(386) 822-6400
ESERVICEVOLUSIA@SAO7.ORG

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

CASE NO. 2021-101594 CFDL

STATE OF FLORIDA

VS.

KVEON ASUN JILES
/

**STATE'S MOTION TO RECONSIDER RULING FROM APRIL 14, 2023 REGARDING
THE GLOCK HANDGUN**

COMES NOW, R. J. Larizza, State Attorney for the Seventh Judicial Circuit, by and through the undersigned Assistant State Attorney, pursuant to Florida Rule of Criminal Procedure 3.192, and hereby moves this Honorable Court to Reconsider this Court's Ruling as to the Glock Handgun, and as grounds therefore would state:

1. The Defense filed 5 Motions in Limine that were heard on April 14, 2023. The Glock handgun was not mentioned in any of the Motions in Limine filed by the Defense.
2. The firearms mentioned in the Defense's Motions were the AR-15 style rifle, a Taurus, and a Smith and Wesson. All of these firearms were taken from the Hard Rock Casino offense.
3. During the hearing, the Court asked the State about the Glock while discussing the recovered AR-15, and whether it was taken during the offense at the Hard Rock Casino. It was not, but it was found with the murder weapon in the lake.
4. The Court then asked if there was any crime committed with the Glock. Although neither side was aware of any specific crime committed with the Glock, the State

argued it would be inextricably intertwined since it was found with the murder weapon. the Defense argued that there was nothing tying the Defendant to the Glock in any way, shape, or form.

5. However, upon further review of the evidence in this case, the State would point out that witness Laquesha Dillard Marks did see the Defendant prior to the murder, in the area of the murder, with a firearm resembling a Glock with an extended clip.
6. In her initial interview with law enforcement she indicated she saw him on the street with a long silver and black gun. Later, during her review of the photo lineup, she noticed the department issued firearm on Sgt. Justin Allen's gun belt and said the gun she saw in the Defendant's possession on the night of the murder was similar to his department issued firearm.
7. Sgt. Allen's department issued firearm at the time of the lineup was a Glock. She also clarified that the long part she saw was an extended clip.
8. The Glock recovered with the murder weapon in this case also had an extended magazine.
9. In Albarran v. State, 890 So. 2d 1267 (Fla. 5th DCA 2005), the Court ruled that a weapon that was not the murder weapon was admissible as it was found on the defendant during a traffic stop as it was inextricably intertwined with the discovery of the murder weapon. Id. at 1268.
10. Our case is similar to Albarran as the Glock was found with the murder weapon. Additionally, the defendant having been seen with a handgun similar to a Glock hours before the murder, in the area of the murder, makes the testimony and evidence regarding the Glock inextricably intertwined.

WHEREFORE, the State of Florida requests that the ruling on the Glock from April 14, 2023 be reconsidered as it was not part of any Motion set for hearing that day and because it would be inextricably intertwined.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Sean Landers, Attorney for the Defendant, this 21st day of April 2023.



JEANNE STRATIS
ASSISTANT STATE ATTORNEY
FLORIDA BAR NO. 0479004
101 N. ALABAMA AVENUE
DELAND, FL 32724