

**Seventeenth Annual   
National Pretrial Competition**

Stetson University College of Law

October 3-6, 2024

**Pretrial Memorandum**

*State of Stetson*

*v.*

*Jay Cameron*

CASE NO: 2024-CR-319

**Team 124**

**Prosecution**

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IN THE SUPERIOR COURT OF THE STATE OF STETSON

PINELLA COUNTY JUDICIAL DISTRICT

STATE OF STETSON :

:

vs. : DOCKET NO: 2024-CR-319

:

JAY CAMERON :

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**ORDER**

AND NOW, on this \_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ 2024, it is hereby ORDERED that Defendant Jay Cameron’s Motion to Dismiss Pursuant to Stand Your Ground Immunity under Stetson General Statutes §§ 776.012 and 776.032 is hereby DENIED because Defendant Jay Cameron is not entitled to immunity for justifiable use of deadly force. Defendant Jay Cameron is not entitled to such immunity because (1) Defendant Jay Cameron was engaged in unlawful activity at the time of the shooting by carrying a concealed weapon and because (2) Defendant Jay Cameron was the aggressor in this incident.

**BY THE COURT:**

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Presiding Judge Omar Prince**

IN THE SUPERIOR COURT OF THE STATE OF STETSON

PINELLA COUNTY JUDICIAL DISTRICT

STATE OF STETSON :

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vs. : DOCKET NO: 2024-CR-319

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JAY CAMERON :

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**RESPONSE IN OPPOSITION TO DEFENDANT JAY CAMERON’S MOTION TO DISMISS PURSUANT TO STAND YOUR GROUND IMMUNITY UNDER STETSON GENERAL STATUTES §§ 776.012 AND 776.032**

**I. INTRODUCTION**

On August 22, 2022, Defendant Jay Cameron (“Defendant”) was formally charged with Attempted Murder in the Second Degree in violation of Stetson General Statutes §§ 784.04 and 777.04, and Carrying a Concealed Weapon, in violation of Stetson General Statute § 790.01. Judge Prince subsequently issued an arrest warrant. R.68. On July 14, 2024, Defendant was taken into custody following a routine patrol motor vehicle stop. R.69. An arraignment for the criminal charges against Defendant took place on July 15, 2024 in front of Judge Prince. R.70-75. At the arraignment, Defendant pleaded Not Guilty to both counts, claiming the Stand Your Ground doctrine gives him immunity. *Id.* In conjunction with his argument, Defendant filed a Motion to Dismiss pursuant to Stand Your Ground Immunity Under Stetson General Statutes §§ 776.012 and 776.032 with this Honorable Court. The State now submits this Response in Opposition to Defendant Jay Cameron’s Motion to Dismiss Pursuant to Stand Your Ground Immunity under Stetson General Statutes §§ 776.012 and 776.032 and respectfully requests this Honorable Court deny Defendant’s Motion to Dismiss.

**II. STATEMENT OF FACTS**

On August 6, 2022, Ryan Wilson (“Mr. Wilson”) was occupying Room 1045 at the Boals Motel. R.12; R.19.28. Mr. Wilson, once his girlfriend had left for work around 9:30 A.M., went to sit outside of his room. R.56.56-60. Approximately fifteen (15) minutes later, around 9:45 A.M., Defendant and his brother, Greg Cameron (“Mr. G. Cameron”), walked past Mr. Wilson. R.56.60-61. Mr. Wilson had noticed Defendant around the Motel before because Defendant always seemed to be watching him. R.57.63-64. Upon walking past Mr. Wilson, Defendant stated, “This will be my turf soon.” R.57.70. After exchanging a few other threatening words, Defendant walked away from Mr. Wilson, Mr. G. Cameron following.[[1]](#footnote-1)

Defendant and Mr. G. Cameron returned approximately forty-five (45) minutes later, and Defendant was looking for trouble. R.20.61-62; R.33.115-19; R.58.98. Defendant was walking speedily, with his red sweatshirt covering his head and face.[[2]](#footnote-2) Defendant had his right hand stuffed into the front pocket of his sweatshirt. R.21.70; R.58.104-06. It was clear to bystanders that Defendant had an object in the front pocket of his sweatshirt, but it was unclear what that object was.[[3]](#footnote-3) R.58.108-10. Defendant walked into a breezeway, but not before giving Mr. Wilson a hard stare. R.59.131-32. Mr. Wilson threw his hands up in the air as if to say, “What do you want?” R.59.132-33. Defendant made an ambiguous motion with his hand and turned to walk into the breezeway, out of sight from Mr. Wilson. R.34.135-38; R.47.83-86; R.59.131-60.141.

Mr. Wilson, feeling uneasy that Defendant, who had just sent him a threatening glare, was out of his eyesight, got a firearm from his friend for self-defense.[[4]](#footnote-4) Mr. Wilson then went to the edge of the breezeway to ensure that Defendant was only walking peacefully away. *Id.* Yet, right as Mr. Wilson came to the edge of the breezeway, Defendant swiftly turned around, pulled out a firearm from his sweatshirt pocket, and shot at Mr. Wilson. R.60.148-50. Mr. Wilson, protecting himself from Defendant’s aggressive actions, returned fire. R.60.150-51. Even after Mr. Wilson began to back up, Defendant continued to come towards him. R.60.153. Mr. Wilson attempted to run away, but he slid out of his shoes, tripped, and fell down. R.36.197-202; R.60.155-61.159. Mr. Wilson was unable to flee to safety. *Id.* Still more, Mr. Wilson dropped his firearm when he fell, leaving him completely defenseless. R.36.202; R.61.159-62. Despite this, Defendant continued his harsh behavior, firing another shot into Mr. Wilson’s back as he fell. R.36.202-03; R.61.162-65.

After being called to the scene, Detective Hernandez of the local police found several individuals who were present during the shooting and interviewed them. R.18-26; 28-39; 44-51; 54-62. In his interview, Defendant told Detective Hernandez he is “sick of [Mr. Wilson] scaring our community.” R.20.50-51. Mr. G. Cameron’s interview also showed the depth of Defendant’s animosity toward Mr. Wilson. R.31.64-79. Mr. G. Cameron described his brother as an arrogant individual who “thinks he’s invincible.” R. 31.67-74. Mr. G. Cameron also told Detective Hernandez his little brother thinks that “if someone does…corner the market, it should be him” and that Defendant aspired to be “like the neighborhood Robin Hood.” R.31.66-67.

**III. LEGAL ARGUMENT**

**A. Standard of Review**

“In evaluating the evidence at a hearing on immunity, an objective standard applies.” *Huckelby v. State*, 313 So.3d 861, 866 (Fla. Dist. Ct. App. 2021) (quoting *Garcia v. State*, 286 So.3d 348, 351 (Fla. 2d Dist. Ct. App. 2019). "The trial court must determine whether, based on the circumstances as they appeared to the defendant, a reasonable and prudent person situated in the same circumstances and knowing what the defendant knew would have used the same force as did the defendant." *Id. See also* *Toledo v. State*, 452 So. 2d 661, 663 (Fla. 3d Dist. Ct. App. 1984) (finding a person in the exercise of his right to self-defense may use only such force as a reasonable person, situated as he was and knowing what he knew, would have used under like circumstances). Further, “the conduct of a person acting in self defense is measured by an objective standard, but the standard must be applied to the facts and circumstances as they appeared at the time of the altercation to the one acting in self defense.” *Price v. Gray’s Guard Servs., Inc.*, 298 So. 2d 461, 464 (Fla. 1st Dist. Ct. App. 1974).

**B. Defendant was engaged in unlawful activity at the time of the**

**shooting by carrying a concealed weapon.**

Defendant is not entitled to immunity under Stetson’s Stand Your Ground Law, as he was engaged in a criminal activity at the time he used deadly force. Stetson General Statute § 776.012 states, “A person is justified in using or threatening to use deadly force if he or she reasonably believes using or threatening to use such deadly force is necessary to prevent imminent death or great bodily harm to himself or herself or another or to prevent the imminent commission of a forcible felony.” However, that statute further states, “A person who uses or threatens to use deadly force in accordance with this subsection does not have a duty to retreat and has the right to stand his or her ground *if the person using or threatening to use the deadly force is not engaged in a criminal activity*, is in a place where he or she has a right to be, and is not the aggressor.” Stetson Stat. § 776.012 (emphasis added). Defendant was engaged in criminal activity because, at the time of the incident, he (1) did not have a license to carry a concealed firearm, and he (2) carried a concealed firearm in violation of Stetson Stat. § 790.01(2) (2022).

Stetson General Statute § 790.01(2) provides, “A person who is not licensed to carry a concealed firearm and who carries a concealed firearm on or about his or her person commits a felony of the third degree.” Defendant has admitted he carried a firearm on his person at the time of the incident. R.21.66-67. Further, the parties have previously stipulated that Defendant did not have a concealed carry license on August 6, 2022. R.4.Thus, the matter of whether Defendant possessed a concealed carry license is not at issue. What is at issue, however, is whether the firearm Defendant carried was “concealed” on or about his person at the time of the incident.

The evidence obtained through discovery makes clear Defendant carried a concealed firearm on or about his person at the time of the incident. A concealed firearm is defined as “any firearm which is carried on or about a person in a manner designed to conceal the existence of the firearm from the ordinary sight or knowledge of another person.” Stetson Stat. § 790.01(2). Thus, the State need only provide evidence to prove Defendant *either* carried a firearm in a manner designed to conceal the existence of the firearm from the ordinary sight of Mr. Wilson *or* carried a firearm in a manner designed to conceal the existence of the firearm from the knowledge of Mr. Wilson. The State, however, has collected evidence that proves Defendant carried a firearm in a manner designed to conceal the existence of the firearm *both* from the ordinary sight *and* knowledge of Mr. Wilson. Further, substantial case law exists regarding the concealed carry of a firearm in Stand Your Ground cases. All of these cases, discussed below, make clear that the U.S. judicial system categorizes actions similar to Defendant’s in the present case as behavior that constitutes concealed carry.

Defendant carried a firearm in a manner designed to conceal the existence of the firearm from the ordinary sight of Mr. Wilson. Defendant kept his .40 caliber firearm in the front pocket of his hoodie the entire time he interacted with Mr. Wilson until Defendant used it to fire shots at Mr. Wilson in the breezeway of Boals Motel. R.21.70-71. While other present individuals were able to tell Defendant had an object in his hoodie pocket, the firearm remained concealed from ordinary sight. No one was able to conclusively discern that the object in Defendant’s hoodie pocket was a firearm since they were unable to see any part of the firearm outside of the hoodie. R.47.66-78; R.58.104-09.

Courts have continuously determined that a firearm that was out of ordinary sight because they were covered by a piece of clothing constitutes a concealed firearm. In *United States v. Conner*, the court found the defendant was in possession of a concealed weapon, despite a detective being able to tell Conner had a large object in the pocket of his sweatpants. 2024 WL 343143 (E.D. La. Jan. 30, 2024). The detective testified he noticed the right pocket of the defendant’s sweatpants “flopping back and forth.” *Id.* at \*3. The detective further stated he could see a large object that was weighted and he “could obviously see the L shape, which was consistent [with] a firearm.” *Id.* Despite this, the detective was only able to tell there was a possibility the defendant was carrying a firearm, as he “had not laid eyes on the actual firearm.” *Id.* Similarly, in *United States v. Bontemps*, the court found the defendant was carrying a concealed weapon. 977 F.3d 909 (9th Cir. 2020). The court determined the weapon was out of ordinary sight even when police were able to observe a “very large and obvious bulge” under the defendant’s sweatshirt. *Id.* at 912.

These two cases are extremely similar to the circumstance at hand. In all three cases, bystanders were able to see an object was placed within the defendant’s clothing, but bystanders were unable to see and conclusively determine what the covered object was. Due to the similarities of the facts of these cases, the State urges this Honorable Court to follow the precedent set forth in the case law outlined above, and rule Defendant was carrying a concealed firearm because he carried a firearm in a manner designed to conceal the existence of the firearm from the ordinary sight of Mr. Wilson.

Defendant also carried a firearm in a manner designed to conceal the existence of the firearm from the knowledge of Mr. Wilson. Defendant kept the firearm in the front pocket of his hoodie when he passed Mr. Wilson in the parking lot of Boals Motel. R.21.70; R.33.134-34.135. While Defendant claims that, as he was walking through the Boals Motel parking lot, he used his right hand to make the shape of a gun and said, “Pop pop,” Defendant never said the words “I have a gun.” R.21.73-79. Additionally, Defendant made this motion with his hands pointed towards the air, not pointed at Mr. Wilson. R.34.137-38. Furthermore, there were several cars in between Defendant and Mr. Wilson at that point, making it hard for Mr. Wilson to discern Defendant’s actions. R.21.84-85; Videotape: Security Footage (Boals Motel 2022); R.40-41; R.52. Because of the ambiguity of Defendant’s hand gesture, as well as Defendant being located far away from Mr. Wilson when he made the hand gesture, witnesses, including Mr. Wilson, were unsure of the meaning of Defendant’s actions. R.59.122-23; R.47.69-73. This is made clear by the fact Mr. Wilson did not react in any way to Defendant’s actions. R.59.125-29; R.47.79-81. Thus, Defendant’s actions were not conducted in such a manner as to reveal the existence of the firearm to Mr. Wilson’s knowledge.

Whether Defendant attempted to make surrounding individuals knowledgeable he possessed a handgun is irrelevant, as “the specific intent of the defendant to conceal the weapon is not an element of the crime.” *Dorelus v. State,* 747 So.2d 368, 372 (Fla. 2000). “Whether [the defendant] intended to carry a concealed firearm in violation of the prohibition against concealment is immaterial.” *Wolfram v. State,* 568 So.2d 992, 994 (Fla. App. Ct. 1990). Thus, Defendant carried a firearm in a manner designed to conceal the existence of the firearm from the knowledge of Mr. Wilson despite making a hand signal with the intent the hand signal would reveal the existence of the firearm to Mr. Wilson.

**C. Defendant was the aggressor in this incident.**

Defendant is not entitled to immunity under Stetson’s Stand Your Ground Law because he was the initial aggressor at the time he used deadly force. Stetson General Statute § 776.041(2) states that immunity is not available to a defendant who “initially provokes the use or threatened use of force against himself or herself unless” they reasonably believed they were in “imminent danger of death or great bodily harm” and have exhausted reasonable means of escape. Simply put, “a person does not get to claim that he was acting in self-defense if he is defending himself from violence that he provoked in the first instance.” *Bouie v. State*, 292 So. 3d 471, 477 (Fla. Dist. Ct. App. 2020). Whether a defendant was an initial (or “first”) aggressor is one for the trier of fact to decide; there “need only be some evidence that the defendant was the first aggressor” to justify giving the question to a jury.  *State v. Kee*, 431 P.3d 1080, 1082 (Wash. Ct. App. 2018). Here, the evidence is abundant. The facts show the Defendant was the initial aggressor in this incident because he (1) initiated hostility on the day in question and (2) shot first, despite (3) not having a reasonable belief that he was in danger.

1. *Defendant initiated hostility on the day in question.*

Because “not every act of a defendant will make him or her an aggressor,” the court in *Smith v. State* analyzed “the character of the act coupled with the intent of the defendant” to make a determination. 480 P.3d 532, 544 (Wyo. 2021). There the Wyoming Supreme Court evaluated “the character of the [the defendant’s] aggression, her intent, and whether she knew or should have known that her use of physical force would produce the altercation that eventually ensued.” *Id.* at 545. In that case, the court determined that there was enough evidence, including repeated instances of physical force, that a jury could reasonably have concluded that the defendant was the initial aggressor. *Id.* at 544-45.

Although it should be enough that Defendant shot first, he also provoked the altercation. This often means the defendant’s provoking act must be an intentional one that a “jury could reasonably assume would provoke a belligerent response from the victim.” *State v. Espinosa,* 438 P.3d 582, 587 (Wash. Ct. App. 2019). Courts have further characterized a provoking act as “one that is calculated and intended to provoke a difficulty or encounter wherein the accused is afforded the opportunity to slay his adversary without the accused having, in good faith, abandoned his original intent.” *Taylor v. State*, 287 So. 3d 202, 206 (Miss. 2020) (quoting *Patrick v. State*, 285 So. 2d 165, 169 (Miss. 1973)). The Supreme Court of Wyoming has also noted there is no defense when the defendant’s actions are “made of malice” and create an opportunity for the defendant to “wreak vengeance on the assailant.” *State v. Bristol,* 84 P.2d 757, 766 (Wyo. 1938). Thus, the principal inquiry should be “whether the assault occurred ‘in the course of a dispute provoked by the defendant at a time when he [knew] or reasonably ought to [have known] that the encounter [would] result in mortal combat.’” *Brown v. State*, 698 P.2d 671, 674 (Alaska Ct. App. 1985) (quoting *State v. Millett,* 273 A.2d 504, 510 (Me. 1971)). This is certainly the case here.

The Defendant had a long-standing vendetta against Mr. Wilson; he was itching for a confrontation. R.30-31. The very first thing Defendant said to Detective Hernandez was that Mr. Wilson is a “violent drug-dealer who thinks he’s king of these streets.” R.19.27-28. He continued to rail against Mr. Wilson, saying that he is “sick of [Mr. Wilson] scaring our community” and comparing him to a character from *The Wire.* R.20.47-51. Even Mr. G. Cameron recognized that Defendant’s animosity toward Mr. Wilson stemmed from jealousy rather than a belief in fairness. R.11.67. Mr. G. Cameron described his brother as an arrogant individual who “thinks he’s invincible.” R.31.67-68; R.31.74. Mr. G. Cameron also told Detective Hernandez his little brother thinks that “if someone does…corner the market, it should be him” and that Defendant aspired to be “like the neighborhood Robin Hood.” R.31.66-77. Defendant would never pass up an opportunity to take Mr. Wilson’s place as the neighborhood’s kingpin.

The enmity Defendant felt toward Mr. Wilson was highlighted by his provocative actions on August 6. He engaged in a “course of aggressive conduct, rather than a single aggressive act” that “can be part of a single course of conduct.” *State v. Grott,* 458 P.3d 750, 758 (Wash. 2020) (finding that the defendant’s actions warranted a “first aggressor” jury instruction). The morning of the shooting, Defendant walked by Mr. Wilson, “used [his] left hand to make the shape of a gun,” and said, “Pop pop–you’re done” R.21.73-75; R.47.70. Defendant clearly intended to inform Mr. Wilson that he was armed. R.21.75. Additionally, Defendant testified that he meant to let Mr. Wilson know “not to mess with [him].” R.21.75-76.

These facts are similar to a Washington Court of Appeals case involving a fatal shooting, *State v. Zeigler.* 546 P.3d 534 (Wash. Ct. App. 2024). The court examined the defendant’s “course of action leading up to and prior to the shooting itself”; the court determined the defendant’s “repetition of the phrase ‘I’m a real gangster’ coupled with the gun in his pocket and the aggressive conduct” were enough for the jury to find that the defendant was the aggressor. *Id.* at 542. Defendant’s hand signal, the prominent outline of the gun, and the statement “Pop pop” clearly combine into a single course of aggressive conduct, making him ineligible for a self-defense argument.

2. *Defendant shot first.*

In self-defense scenarios, many states consider whether the defendant was the first to use physical force or discharge a firearm when determining the initial aggressor of an altercation. Several jurisdictions say that “some sort of physical aggression or threat of imminent use of deadly force is required before someone will be considered an aggressor.” *Smith v. State*, 480 P.3d 532, 544 (Wyo. 2021); *See also Floyd v. Florida Department of Corrections*, No. 3:15CV361-MCR/CAS, 2017 WL 4229054 (N.D. Fla. July 7, 2017); *State v. Jimenez*, 636 A.2d 782, 785 (Conn. 1994); *Freeze v. State*, 491 N.E.2d 202, 204 (Ind. 1986). For example, in *People v. Reese*, the Supreme Court of Michigan upheld a trial court’s finding that the defendant was the initial aggressor in a deadly shootout because he fired the first shot. 815 N.W.2d 85, 89-90 (Mich. 2012). In 2014, the Court of Appeals of Alaska upheld a jury instruction that said “only the person who fires the first shot, strikes the first blow, or speaks the first insult can be deemed an initial aggressor.” *Lindoff v. State*, No. A-11119, 2014 WL 2999204, at \*2 (Alaska Ct. App. July 2, 2014). Although the court found issue with the last portion of that specific instruction, they did not find plain error because “the central dispute at trial was the first physical aggressor.” *Id.*

All evidence—barring Defendant’s own testimony—indicates that Defendant shot his gun first. Most importantly, the video footage of the shooting clearly shows that Defendant fired his weapon first; Mr. Wilson did not raise his arm to shoot until after Defendant had done so. Videotape: Security Footage (Boals Motel 2022); R:40-41; R.52. Mr. Wilson’s testimony corroborates that he did not shoot first. R.60.150-51. Officer Hernandez’s August 6 incident report notes that witness Kenny Gray said that Defendant shot first.[[5]](#footnote-5) R.5. Mr. Gray’s formal interview repeats this assertion. R.46.87-88. Defendant’s brother is unsure who shot first. R.35.161-62. The Defendant himself is the only one claiming that he was not the first to fire his weapon, but he does admit that the security footage is accurate. R.23.112-13; R.26.180-83.

3. *Defendant did not have a reasonable belief that he was in danger.*

Even though physical force should be enough to establish the initial aggressor, some jurisdictions consider whether the defendant reasonably perceived a threat of physical force before making a determination. *State v. Jones*, 128 A.3d 431, 452 (Conn. 2015). The Court of Appeals of Indiana considers this element essential in cases involving the use of deadly force. *Bell v. State*, No. 23A-CR-1931, 2024 WL 3580139, at \*4 (Ind. Ct. App. July 30, 2024). However, Defendant is not entitled to a presumption that he had a reasonable belief that he was in danger of bodily harm. Courts have repeatedly held that “mere words alone are insufficient to create a reasonable apprehension of bodily harm entitling a person to respond with lawful force in self-defense.” *State v. Espinosa,* 438 P.3d 582, 587 (Wash. Ct. App. 2019). Without the presumption, the analysis of the situation must be objective and consider all the defendant knows and sees. *Id.* at 362.

Defendant claims he “knew” Mr. Wilson was going to kill him, supporting this belief primarily with the statements and behavior of others. R.22.106-07. He only assumed Wilson had a gun and he corroborated his fear because one of Wilson’s associates, one of whom Defendant himself described as “high as [a] kite[],” said “he’s done” and something that sounded like “you watch, he’s a dead man” before turning around. R.22.98-110. Defendant was not far from his residence at the time of the shooting and could have either kept walking or sped up his pace to avoid this confrontation. Instead, despite claiming to be fearful of Mr. Wilson, Defendant chose to confront Mr. Wilson physically.

Defendant also based his alleged fear for his life on his knowledge of Mr. Wilson’s reputation. He states in his interview that he has “seen [Mr. Wilson] pull guns on people before,” but he never states that he has seen him actually shoot anyone. R.20.49. He calls Mr. Wilson violent and dangerous and accuses Mr. Wilson of scaring the community and causing chaos, but he never establishes gun violence as a prior issue. R.19.27-28; R.20.45-52. All he had to establish his fear were mere words, which are insufficient and “do not give rise to reasonable apprehension of great bodily harm.” *State v. Zeigler,* 546 P.3d 534, 540 (Wash. Ct. App. 2024) (quoting *State v. Riley,* 137 Wash. 2d 904, 912 (1999)).

**IV. CONCLUSION**

We freely admit that Mr. Wilson’s record is by no means spotless, but nothing that he did in the past can in any way justify the fact that Defendant allowed jealousy and malice to drive him to violence. Defendant made the deliberate decision to pull out a gun and shoot Mr. Wilson not once, but twice, leaving him in critical condition. R.43. Defendant committed a crime at the time of the shooting by carrying a concealed weapon out of the ordinary sight and knowledge of those around him. Stetson Stat. § 790.01(2) (2022); *See also* Stetson Stat. § 776.012. Further, because he began the hostilities, discharged his weapon first, and had no reasonable fear prompting him to do so, he was the initial aggressor in this nearly-fatal encounter. These facts make Defendant ineligible for a Stand Your Ground defense under Stetson General Statutes §§ 776.012, 776.041, and 790.01(2).

**WHEREFORE**, the State of Stetson respectfully requests that this Honorable Court deny Defendant Jay Cameron’s Motion to Dismiss in the form of the Order attached hereto.

Respectfully Submitted,

**Date**: September 1, 2024 /s/ Team 124

Counsel for the State of Stetson

**CERTIFICATE OF SERVICE**

We, Team 124, hereby certify that a copy of the foregoing was sent via electronic mail on September 1, 2024, to:

Defense Counsel for Defendant Jay Cameron

nptc@law.stetson.edu

/s/ Team 124

Counsel for the State of Stetson

1. Interview with Ryan Wilson, discussing the words exchanged between him and Defendant:

   **A:** Kid walked by me and said, “This will be my turf soon.” I was sitting in a chair when he

   said that and I thought it was hysterical. Like how dare this kid challenge me? So, I stood up and said something like, “You must be sick in the head because I know you’re not **threatening me** like that!” He replied something like, “Just you wait and see old man.” R.57:70-75. [↑](#footnote-ref-1)
2. Interview with Ryan Wilson, discussing Defendant’s demeanor:

   **A:** This time it was obvious he was looking to start a fight. He had his hood pulled all the

   way up over his head and like tied tight around his face like he was trying to hide his identity. Which was stupid because it wasn’t like I didn’t already know who he was. But he was probably **trying to hide his face from the security cameras**. Anyway, he was walking fast… R.58:98-104. [↑](#footnote-ref-2)
3. Interview with Kenny Gray, discussing the object in Defendant’s hoodie:

   **A:** He had his right hand in the front pocket of his hoodie. It looked like he was holding a

   weapon - **probably** a gun - and that something was about to go down. [↑](#footnote-ref-3)
4. Interview with Ryan Wilson, discussing why he got a firearm:

   **A:** My buddy Tony D had stood up as this was happening and once the dude went into the

   breezeway Tony handed me his gun and I walked over to the edge of the wall to see where the guy was going.

   **Q:** Why?

   **A:** **This guy had just threatened to kill me! I wasn’t going to just stand there with my**

   **back exposed to him. I wanted eyes on him in case I needed to defend myself.**

   R.60:141-48. [↑](#footnote-ref-4)
5. While Mr. Gray refers to Defendant as “the dude in the red sweatshirt,” it is beyond doubt that the “dude” was Defendant:

   Interview with Greg Cameron

   **Q:** Can you just briefly describe who is who in the video?

   **A:** Yeah, Jay my brother is in the red sweatshirt.

   Interview with Kenny Gray

   **Q:** Who’s the guy you mentioned you knew as Jay?

   **A:** The guy in the red sweatshirt. [↑](#footnote-ref-5)