



STETSON LAW

**Seventeenth Annual
National Pretrial Competition**

Stetson University College of Law
October 3-6, 2024

Competition Problem

State of Stetson

v.

Jay Cameron

CASE NO: 2024-CR-319

The 2024 National Pretrial Competition Problem was drafted by Katherine E. Donoghue, Professor of Practice and Director of Advocacy LL.M. & Professional Development Programs at Stetson University College of Law, with the assistance of Alec M. Waid, Trial Attorney at Battaglia Ross Dicus & McQuaid. The Problem is the property of Stetson Law and may not be used, reproduced, or altered in any way without Stetson's express written permission.

Table of Contents

Stipulations of the Parties	4
PPD Incident Report	5
PPD Incident Report	8
EXHIBIT 1	9
EXHIBIT 2	10
EXHIBIT 3	11
EXHIBIT 4	12
EXHIBIT 5	13
EXHIBIT 6	14
EXHIBIT 7	15
EXHIBIT 8	16
PPD Incident Report	17
Interview with Jay Cameron	18
EXHIBIT 9	27
Interview with Greg Cameron	28
EXHIBIT 8A	40
EXHIBIT 8B	41
PPD Incident Report	42
EXHIBIT 10	43
Interview with Kenny Gray	44
EXHIBIT 8C	52
EXHIBIT 11	53
Interview with Ryan Wilson	54
EXHIBIT 12	63
EXHIBIT 13	65
PPD Incident Report	66

Long Form Information.....	67
Arrest Warrant	68
PPD Incident Report	69
Arraignment Transcript.....	70
Stetson General Statutes Penal Code.....	76

Stipulations of the Parties

1. All exhibits are complete, accurate, and authentic.
2. All transcripts are true and accurate transcriptions of what was said.
3. All reports, affidavits, witness statements, exhibits, videos, photographs, and transcripts are complete, accurate, and true copies of the originals.
4. Exhibits 1, 2, 3, 4, 5, 8 (including 8A, 8B, and 8C), and 10 are admissible at any time without objection and may be entered and read into the record by either party at any time during the proceeding.
5. The State of Stetson will call Ryan Wilson and Kenny Gray as witnesses. The Defense will call Greg Cameron and Jay Cameron as witnesses.
6. The identification of the defendant as the shooter is agreed upon by the parties. No argument may be made that the defendant as depicted in any video or photograph evidence is not the same person as in the courtroom.
7. All witnesses may be played by any person of any gender. All parties and witnesses are to assume that the witness on the stand is the person depicted in all videos and still photographs. In other words, no argument may be made that a witness does not match the description/depiction of a person in a video or photograph.
8. It is stipulated that Ryan Wilson's charges for Felony Possession with Intent to Traffick Narcotics and Felon in Possession of a Firearm are still pending and he has been out of custody on a \$100,000 cash/surety bond since those charges were filed in August 2022. It is further stipulated that because of his criminal history, if convicted on those charges, Wilson is exposed to up to 30 years of incarceration as a Persistent Serious Felony Offender. He does not, however, currently have a plea agreement in place with the State of Stetson.
9. It is stipulated that Jay Cameron did not have a concealed carry license on August 6, 2022. It was illegal to carry a concealed weapon in Stetson in 2022. The subsequent change in the law is not retroactive. This stipulation is in no way intended to prohibit the parties from arguing the weapon at issue was not concealed.
10. All reasonable efforts were made to serve the arrest warrant, but authorities were unable to locate Jay Cameron until the motor vehicle stop on July 14, 2024. Any delay in service is not at issue in this case.
11. No constitutional (including 4th, 5th, and/or 6th Amendment) objections will be entertained. This stipulation does not prohibit evidentiary objections.

Petersburg Police Department



102 Freemont Way
Petersburg, Stetson 33713
Main: 727-813-2300
Emergency Dispatch: 911

Incident Report

☒ Narrative
☐ Supplement

<u>Date of Incident</u> 8-6-22	<u>Time of Incident</u> 10:30am	<u>Officer Badge Number</u> 813	<u>Case Number</u> 23-00517
<u>Suspect</u>	<u>Incident Type</u> <input checked="" type="checkbox"/> Criminal <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Violation <input type="checkbox"/> Other	<u>Arrest Status</u> <input type="checkbox"/> On-Site <input type="checkbox"/> Warrant <input checked="" type="checkbox"/> Investigation ongoing	<u>Citation Number</u> N/A

On August 6, 2022, at approximately 10:30am, I along with other units in the area responded to a shots fired call at the Boals Motel in Petersburg. Upon arrival, a male who appeared to be in his late 30's – later identified as Ryan Wilson – was unresponsive on the ground, but the EMT's were actively working to stabilize him and shortly thereafter he was transported to Petersburg General Hospital.

I started talking to Motel residents who were outside to try to determine what happened. Most people were too shaken up or did not know enough about what occurred to be able to speak with me, but then I noticed a young man in his early 20's standing on the far side of the parking lot looking at the scene. He was pacing back and forth and looked agitated. He was wearing a black t-shirt, black gym shorts with a gray stripe down the side, black socks, and black sneakers. I walked up to him and asked him his name. He said, "Kenny." I asked Kenny if he had a last name and he said, "Nope." I replied, "OK, what ya got for me, Kenny?" and he said, "Depends. What's in it for me?" I told him being a decent human being because a young man had been shot and might lose his life. He said, "Sorry, times are tough. If you want information, you gotta do better than that." Given the complete lack of any other leads at this point and the seriousness of the case, I decided to play ball with Kenny and gave him one hundred bucks and told him to "start talking" and "it better be good."

Kenny said he knew the guy on the ground who had been shot. He said his name was Ryan Wilson. They are friends. They went to high school together and they hang out a lot, but he said he doesn't know what Wilson does to make money. He said he's an entrepreneur of sorts. Kenny said it's none of his business. Wilson lives with his girlfriend in an apartment downtown but stays at the Boals Motel regularly in a room on the first floor, the one right next to the outside stairwell. Room 1045. Their friends often meet up there to party and hang out. Wilson is very territorial of his personal space and doesn't like people coming around unless he allows them to visit.

Kenny said that earlier that morning some dude in a red sweatshirt walked by Wilson's room and said, "This will be my turf soon." Kenny said he had seen the guy around the neighborhood and just knew him as "Jay." Wilson was sitting in a chair at the time and stood up and said, "Are you talking to me?" Jay replied, "Damn right – just wait." Another guy was with the dude in the red sweatshirt but didn't say anything. This was around 9:45 in the morning. The two guys then walked away. Wilson walked into his room and then came back out, stuffing something into his front right pocket. Kenny said he didn't see what it was. He said it looked like a gun, but he couldn't say for sure. All he saw was a black object. Could have been a cell phone, he wasn't sure. Kenny said Wilson looked angry though – Wilson spit and shook his head and said, "Let him try. This is my spot." Kenny said it's never good when Wilson gets mad – he's got a reputation of being violent when he needs to be.

About 45 minutes later, Kenny said the two dudes came back and that's when all hell broke loose. The guy in the red sweatshirt walked into the parking lot with his hood up – Kenny said it looked like something was about to go down, but he didn't know what – no one was talking. Kenny said the guy in the red sweatshirt had his right hand in the front pocket of his hoodie. Kenny said he was on edge and didn't take his eyes off the guy because something was about to go down. Kenny said he started to walk away from the area, but then he heard the guy in the red sweatshirt say, 'Pop pop -- you're done.' He said that Wilson didn't say anything or react at all as the dude walked by into the breezeway area by the stairs, but that Wilson then walked to his right and peered around the corner after the dude walked into the breezeway because Wilson wanted to see where he was going, and that's when the shots went off.

Kenny said the dude in the red sweatshirt shot first and that's only when Wilson returned fire. He said he didn't see when or how Wilson got the gun or took it out. He said Wilson kind of backed-up and fell backward after the shooting started and he could see that Wilson had been hit in his upper left chest. He said Wilson turned around and tried to run away but the dude fired another shot, and that's when he saw Wilson fall to the ground. I told him Wilson's gun wasn't found at the scene and asked if he knew what happened to it. He said the dude who was with the guy in the red sweatshirt grabbed it off the ground before they both ran away. I asked where he was positioned when he saw this go down and he said he was taking

cover behind the white and silver SUV in the parking lot. Kenny said he immediately took out his phone and called 911 and shortly after we all showed up.

I told Kenny he had been really helpful and that he had done the right thing. I asked if he would continue to do the decent thing and go the police department for a formal interview. He agreed, but only if I gave him another hundred bucks. I told him I only had \$50 left on me. He said, "better than nothing." I said, "You drive a hard bargain Kenny, but fine," and handed him another fifty bucks. I told him I was going to ask that he go with a patrol officer to the station and wait there until I could return and conduct a full interview with him. He agreed, but said they better get him some food while he waits cause he's hungry. I assured him we wouldn't let him starve and I asked him again for his last name. He said, "Gray. Kenny Gray." I thanked him and sent him to the station with a patrol officer.

Additional patrol officers were ordered to remain outside room 1045 and to keep the scene secure as the forensics team collected evidence. I then applied for a search and seizure warrant for any surveillance footage at the Boals Motel on August 6, 2022, as well as Room 1045 and guest registration information for the motel to attempt to contact potential witnesses. I also put out an APB (All Points Bulletin) to be notified if anyone showed up at a local emergency room with a gunshot wound(s). State's Attorney's Office notified.

Officer Name: Hernandez (Badge 813)

Officer Signature: *Michelle Hernandez*

Date of Incident Report: 08-06-22

Petersburg Police Department



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Petersburg, Stetson 33713
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Incident Report

☐ Narrative

☒ Supplement

<u>Date of Incident</u> 8-6-22	<u>Time of Incident</u> 10:30am	<u>Officer Badge Number</u> 813	<u>Case Number</u> 23-00517
<u>Suspect</u> Unknown at this time.	<u>Incident Type</u> <input checked="" type="checkbox"/> Criminal <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Violation <input type="checkbox"/> Other	<u>Arrest Status</u> <input type="checkbox"/> On-Site <input type="checkbox"/> Warrant <input checked="" type="checkbox"/> Investigation ongoing	<u>Citation Number</u> N/A

Around 11:00am, as I was in a police cruiser applying for a search and seizure warrant for the Boals Motel, the Motel Manager, Terry Jackson, was walked to my location by a Patrol Officer. Jackson said a maid had seen a young man in a red sweatshirt stumble into Room 1077 a little after 10:30am. She said he was bent over and bleeding. She said he was only in the room for a very short time and then took off running with another person, but it looked like he was in pain and wasn't going to make it far. I thanked Manager Jackson for the information and immediately went to Room 1077 to ensure no one was still there and in need of medical attention, and to secure the scene. I will also now include Room 1077 on my search and seizure warrant application affidavit.

Officer Name: Hernandez (Badge 813)

Officer Signature: *Michelle Hernandez*

Date of Incident Report: 08-06-22

**IN THE DISTRICT COURT
OF THE STATE OF STETSON
COUNTY OF PINELLA**

Search Warrant: Boals Motel

Case No. 23-00517

To: Detective Michelle Hernandez of the Petersburg Police Department

You, and any designated person(s) under your command at the Petersburg Police Department, are hereby commanded and authorized in the name of the State of Stetson to forthwith search either in day or night the Boals Motel, located at 999 Park Drive, Petersburg for all room registration records; and Rooms 1077 and 1045 for firearms, ammunition, blood, DNA, fingerprints, documents, clothing, narcotics, electronics, and/or any other evidence that in any way relates to the shooting, or motivation therefor, of Ryan Wilson and take any necessary photographs, measurements, and diagrams of the premises. You are further commanded to search for and seize any and all surveillance footage of or related to the shooting of Ryan Wilson at the Boals Motel.

This search warrant is issued in relation to an offense substantially described as follows:

The attempted murder of Ryan Wilson in violation of Sections 782.04 and 777.04 of Stetson General Statutes. I, the undersigned, have found probable cause to believe that the property or person constitutes evidence of the crime identified herein based on the statements in the search warrant application affidavit sworn to by

Michelle Hernandez

Name of Affiant, Detective

Kevin McClintock

Magistrate Judge, Pinella County Court

August 6, 2022

Petersburg Police Department



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Witness Affidavit

My name is Terry Jackson. I am the Manager of the Boals Motel. I didn't see anything, but earlier today a member of the cleaning staff told me they saw a man in a red sweatshirt bending over and bleeding stumble into Room 1077 around 10:30 in the morning and then leave a short time later. I reported this to the police and allowed them access to that room upon being served with a search and seizure warrant for the premises a little while later. The police searched Rooms 1077 and 1045, and collected the Room Registrant Log and all the surveillance footage that was available. Nothing had been changed, altered, or deleted. I provided any and all camera angles and footage that was available. The cameras are motion activated, so the angle recorded follows the motion it picks up. There was no surveillance footage available from earlier in the day on August 6th because we had lost power in a storm the night before and the power didn't come back on until about 10:00am on August 6th, so the footage provided is all the footage that is available. The camera was also damaged during the shooting when a bullet ricocheted off the wall and struck the camera, so no footage is available from after the shooting other than what I provided to Detective Hernandez.

I hereby attest under penalty of perjury that the above information is true, accurate, and complete.

Witness Name (print): Terry Jackson

Attesting Officer Name: Michelle Hernandez (813)

Witness Signature: *Terry Jackson*

Attesting Officer Signature: *Michelle Hernandez*

Date: 08-06-22

Date: 08-06-22

**IN THE DISTRICT COURT
OF THE STATE OF FLORIDA
COUNTY OF PINELLA**

Search Warrant Inventory: Boals Motel

Case No. 23-00517

The following items were seized following a search of the Boals Motel under authority of warrant:

1. Room Registrant Log from August 6, 2022.
2. Two semi-automatic handguns found in Room 1077. Photographed and secured as evidence.
3. Blood on carpet in Room 1077.
4. Narcotics (field tested positive for M30 Oxycodone, methamphetamine, and crack-cocaine) and packaging materials (plastic baggies, digital scale, and knife) found in Room 1045.
5. Video Surveillance Footage.

The statement above is true and accurate to the best of my knowledge and belief.

Michelle Hernandez

Warrant Executing Detective



EXHIBIT 4

ROOM REGISTRANT LOG

August 6, 2022

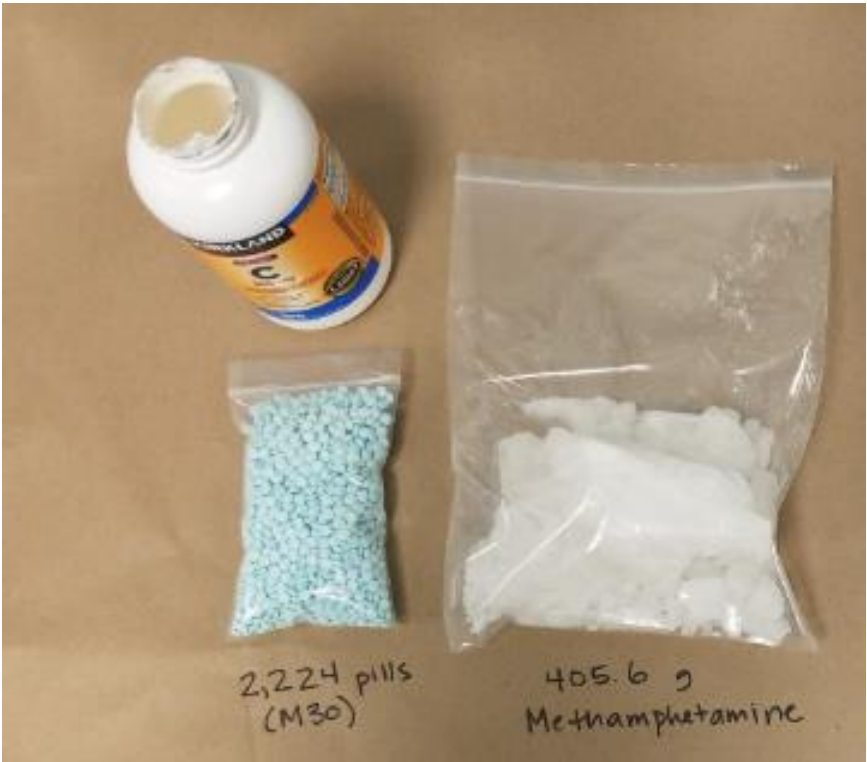
First Floor	Second Floor
Room 1045 – R. Wilson	Room 2046 – Vacant
Room 1047 – Vacant	Room 2048 – Y. Onofre
Room 1049 – Vacant	Room 2050 – Vacant
Room 1051 – Vacant	Room 2052 – Vacant
Room 1053 – C. Yost	Room 2054 - M. Sheplak
Room 1055 – M. Brannan	Room 2056 - D. Reeves
Room 1057 – C. Brazzale	Room 2058 - R. Lechner
Room 1059 – Vacant	Room 2060 - J. McCabe
Room 1061 – C.J. Petty	Room 2062 – Vacant
Room 1063 – M. Bodiford	Room 2064 – Vacant
Room 1065 – L. Hatoum	Room 2066 - M. Kammerlohr
Room 1067 – K. Koski	Room 2068 - K. Ballard
Room 1069 – Vacant	Room 2070 – M. Morey
Room 1071 – C.J. Augustine	Room 2072 – C. Obert
Room 1073 – Vacant	Room 2074 – H. Sowell
Room 1075 – Vacant	Room 2076 - M. Temple
Room 1077 – J. Cameron	Room 2078 – D. Tusha

EXHIBIT 5



EXHIBIT 6





Video Surveillance Footage

<https://youtu.be/EkAVJwiwK0s>

Petersburg Police Department



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Incident Report

☐ Narrative

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<u>Date of Incident</u> 8-6-22	<u>Time of Incident</u> 10:30am	<u>Officer Badge Number</u> 813	<u>Case Number</u> 23-00517
<u>Suspect</u> Jay Cameron Ryan Wilson	<u>Incident Type</u> <input checked="" type="checkbox"/> Criminal <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Violation <input type="checkbox"/> Other	<u>Arrest Status</u> <input type="checkbox"/> On-Site <input type="checkbox"/> Warrant <input checked="" type="checkbox"/> Investigation ongoing	<u>Citation Number</u> N/A

At 1:30pm on August 6, 2022, I received a call from Dr. Flowers at Hillsboro County Medical Center – that a 24-year-old male had presented in their emergency room with a gunshot wound to the lower right quadrant of his abdomen. It was a penetrating gunshot wound that did not damage any vital organs, but the patient suffered significant blood loss and presented with severe hypotension in the ER. Another male who reported to be the victim's brother was with him. I asked my colleague, Detective Mike Vanzee, to come with me knowing that there were two potential suspects present at the hospital and together we headed over to the Hillsboro County Medical Center, which is notably in a different county and a significant distance from the Boals Motel in Pinella County – approximately a 35-minute drive this time of day – suggesting the patient did not want to receive medical treatment for this gunshot wound in Pinella county.

Officer Name: Michelle Hernandez (813)

Officer Signature: *Michelle Hernandez*

Date of Incident Report: 08-06-2022

Petersburg Police Department



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Interview with Jay Cameron

1 **Q:** This is Detective Michelle Hernandez. I'm here at Hillsboro
2 County Medical Center with Jay Cameron. Mr. Cameron has
3 voluntarily agreed to speak with me, he is not under arrest, but
4 has nevertheless been fully advised of his *Miranda* warnings just
5 for safe measure. Mr. Cameron do you understand your rights,
6 and do wish to waive them and speak with me voluntarily?

7 **A:** Yes.

8 **Q:** Can you please state your name?

9 **A:** Jay Cameron

10 **Q:** How old are you?

11 **A:** 24.

12 **Q:** Do you remember what happened earlier today on August 6,
13 2022, at the Boals Motel?

14 **A:** Of course.

15 **Q:** Are you under the influence of any narcotics at this time
16 that affect your memory?

17 **A:** No, they gave me some pain medication when I first came in,
18 but I'm fine. Just a flesh wound. Let's just get this over
19 with.

20 **Q:** Well, I'll note that you appear conscious, calm, and
21 coherent. Do you agree with that assessment?

22 **A:** Yup. That's accurate. I'm good. Let's do this.

23 **Q:** OK. Let's start at the beginning. How did your day start?

24 **A:** I was staying at the Boals Motel. I woke up around 9:00 in
25 the morning and decided to go get some breakfast. I called my
26 brother to join me, and he came by. We walked through the
27 breezeway and into the parking lot and that's when I saw Wilson
28 - a violent drug-dealer who thinks he's king of these streets.

29 **Q:** Let's back up for a minute. Why were you staying at the
30 Boals motel?

31 **A:** I stay there from time to time. Don't really have a
32 permanent place to live. Sometimes I stay with my mom,
33 sometimes my grandmother. Just depends what's going on in life.
34 But the Boals Motel is a good spot - safe, clean, good area, and
35 cheap. So, when I need to crash there, I do.

36 **Q:** What is your brother's name?

37 **A:** Greg Cameron.

38 **Q:** Why did you want to get breakfast with him that day?

39 **A:** Strength in numbers.

40 **Q:** Why do you need strength in numbers?

41 **A:** These are tough streets and I just want to mind my own
42 business and live my life. But people like Wilson make that
43 tough.

44 **Q:** What do you mean?

45 **A:** Wilson has been threatening everyone at the Boals Motel for
46 months. He thinks just cause he's done some time that he's some
47 kind of tough guy. It's like he watched the show The Wire and
48 is trying to be Stringer Bell or something. I know he's
49 dangerous - I've seen him pull guns on people before and I've
50 seen him get into bar fights - but I'm sick of him scaring our
51 community. We all just want to live our lives in peace, and he
52 just swings drugs and causes chaos. I'm sick of it.

53 **Q:** So, what happened?

54 **A:** I walked by him on my way to breakfast and he said, "Keep
55 your distance, or else." I replied, "I'm not scared of you."
56 And he said, "You talking to me?" I said, "Who else?" and then
57 he said, "You're a dead man walking." Obviously, that shook me,
58 and I knew I'd have to defend myself if he ever came at me, but
59 that wasn't the time, so I just walked out of the parking lot.

60 **Q:** What happened next?

61 **A:** Greg and I went to get food and then we walked back to the
62 Motel like 45 minutes later. I saw Wilson still outside as I
63 was approaching but I didn't want to deal with him, so I just

64 kept my hood up and my head down and walked fast to just get by
65 him as quickly as possible.

66 Q: Did you have a gun on you?

67 A: Yes. I'm not a felon, I can legally carry a gun. And it
68 wasn't like I was trying to hide that fact from him.

69 Q: What do you mean?

70 A: My gun was in the front pocket of my hoodie and my gun isn't
71 exactly small - it's a large .40 caliber. There were other
72 people around though and I don't want to just go pointing a gun
73 at someone, so to show him that I had it on me I used my left
74 hand to make the shape of a gun as I was walking and I said,
75 "Pop pop" so that he would know I was armed and not to mess with
76 me. Wilson is a dangerous dude, and I'm not an idiot. The only
77 way to keep him away from me was to let him know I was armed.

78 Q: Did you say, "I have a gun."

79 A: No. Who talks like that?

80 Q: Then what happened?

81 A: Nothing, I just kept walking and didn't say anything else.

82 Q: As you were walking through the parking lot, when exactly did
83 you say, "Pop pop?"

84 A: As I was walking through the parking lot before I turned
85 toward the breezeway. There were still cars between him and me.

86 Q: What happened next?

87 **A:** I could see Wilson was standing there with his hand in his
88 pocket and he was holding something. It was obviously a gun.

89 **Q:** Could you see it was a gun?

90 **A:** Not specifically, but it was obviously a black object, and
91 his hand was right on it - no need to hold a cell phone like
92 that. It was like he was ready.

93 **Q:** Did he pull it out and point it at you?

94 **A:** Not really. I mean, I saw his arm move and he pulled an
95 object out of his pocket. I couldn't see what it was but
96 knowing Wilson's violent rep, I assumed it was a gun. Even
97 though he didn't point it at me, I knew he was gonna try to kill
98 me. I'm not stupid. There were also two guys with Wilson.
99 High as kites. One was half passed out in a chair and the other
100 was kind of slowing pacing around mumbling to himself. As I
101 walked by, those two dudes started snickering and giggling and I
102 heard one of them say, "He's done."

103 **Q:** Where was your brother at this point?

104 **A:** I assumed he was still right on my heels.

105 **Q:** Then what happened?

106 **A:** My heart started racing at this point. I knew Wilson was
107 going to try to kill me, so I just kept walking into the
108 breezeway and then as I entered the breezeway and was by the
109 stairs I heard a voice behind me yell something - it sounded

110 like "Yo watch, he's a dead man." So, I turned around and drew
111 my gun.

112 **Q:** Did you shoot?

113 **A:** Hell yes! But not until after he shot at me first. I saw
114 his gun, he shot at me first, and then I shot back. It all
115 happened really fast. But I definitely shot after he shot. I
116 was just defending myself.

117 **Q:** What happened next?

118 **A:** We each shot back and forth a few times. He shot me in the
119 right side of my stomach, and I shot him in the left shoulder
120 area. I know that because when the bullet hit him, he like
121 stumbled backward and like spun toward his left and turned his
122 back, but his gun was still in his right hand and it was still
123 pointed toward me as he was spinning to the left, so I shot
124 again and hit him in the back. He dropped the gun at that
125 point, and I told my brother to get it quickly so he couldn't
126 keep shooting at me and that we had to get the hell out of
127 there.

128 **Q:** What did your brother do?

129 **A:** He did what I told him, he ran over and grabbed the gun off
130 the ground, and we ran away through the breezeway. We went into
131 my room and ditched the guns.

132 **Q:** Why leave them there?

133 **A:** Look I had nothing to hide and was gonna get in touch with
134 you all and tell you what happened, but in that moment, I was
135 scared for my life. This guy had just shot at me, he had two
136 friends there with him and I had no idea if they were gonna come
137 after me. I was in pain and was bleeding and knew I had been
138 shot in the stomach. I didn't want to die, but I also didn't
139 want to roll up to a hospital with multiple guns on me and cause
140 problems for myself or my brother. So, we put the guns in the
141 room, and figured we'd come back for them later. I'm the victim
142 here, I didn't think you'd be searching my room. Whatever, it
143 wasn't exactly a brilliant plan, but I was stressed out man, and
144 in pain and bleeding. Clearly, I wasn't thinking straight.

145 **Q:** Why didn't you go to a hospital over in Pinella County?

146 **A:** I don't know. My brother drove me here. I was half
147 conscious.

148 **Q:** I'm showing you a picture of the two guns we found in your
149 room (Exhibit 5). Which one is your gun, and which one is
150 Wilson's?

151 **A:** The bigger gun is mine. The smaller one is Wilson's.
152 Probably why I couldn't really tell it was a gun when I saw it
153 in his pocket.

154 **Q:** I thought you said you knew it was a gun?

155 **A:** I mean, I assumed he had a gun, because of his violent
156 reputation, and I know he's pulled guns and shot at people

157 before, but he's never got caught because no one wants to rat on
158 him. Anyway, it was just how he was standing there with his
159 hand in his pocket. But no, he didn't point the gun at me while
160 I was walking by, he saved that until my back was turned.
161 Coward. And when I turned around to defend myself, I saw his
162 gun clearly pointed at me before I shot.

163 Q: What do you do for work?

164 A: Odd jobs around town. None of your business.

165 Q: Quick cash in drug dealing?

166 A: I know what you're implying. I wasn't trying to rip him off
167 man. Like in broad daylight? With his boys there? With me and
168 my brother completely exposed in the parking lot? That's just a
169 death wish. I'm not stupid. It's a big city. I don't want his
170 turf.

171 Q: Why did you have your hood up when you walked back into the
172 parking lot?

173 A: It's Stetson in August. Sun is strong. Don't want to get
174 skin cancer.

175 Q: Did you know the Motel has security cameras?

176 A: Uhhh, no. Audio and video?

177 Q: Just video.

178 A: Cool. Well whatever man. It will show he shot at me first
179 and threatened my life. I'm the victim here.

180 Q: Let's watch it together then. Pressing play on the video
181 surveillance footage (Exhibit 8). [Video plays.] What do you
182 think?

183 A: Exactly what happened, exactly as I said it went down.

184 Q: We'll leave that judgement call to the State's Attorney's
185 Office. Is there anything else about what happened that you
186 haven't told me?

187 A: Nope.

I have reviewed the above transcript of my interview with Detective Hernandez, and I affirm under penalty of perjury that it is true, accurate, and complete.

Signature: Jay Cameron

Date: August 6, 2022

Record of Arrest and Prosecution of Jay Cameron

NAME/ CAMERON, JAY

SDL#/F7882929

SSN/551422876

ARR/DET/CITE/CONV:

#1

03-13-2019 ARREST PPD CC 484—POSSESSION OF METHAMPHETAMINE, FELONY

03-15-2021 DIVERSION DOCKET. SUCCESSFUL DRUG PROGRAM COMPLETION.
DISMISSAL.

#2

4-25-2021 ARREST PPD CC 520—DRIVING UNDER THE INFLUENCE OF DRUGS,
MISDEMEANOR.

5-15-2021 CONVICTED, PLEA OF GUILTY, 1 YEAR PROBATION, FINE \$1,500

Petersburg Police Department



102 Freemont Way
Petersburg, Stetson 33713
Main: 727-813-2300
Emergency Dispatch: 911

Interview with Greg Cameron

1 Q: This is Detective Michelle Hernandez. I'm here at Hillsboro
2 County Medical Center with Greg Cameron. Mr. Cameron has
3 voluntarily agreed to speak with me, he is not under arrest, but
4 has nevertheless been fully advised of his *Miranda* warnings just
5 for safe measure. Mr. Cameron, do you understand your rights
6 and wish to waive them and speak with me voluntarily?

7 A: Yes.

8 Q: What is your full name?

9 A: Gregory James Cameron.

10 Q: How old are you?

11 A: 28.

12 Q: Do you know Jay Cameron?

13 A: Yeah, he's my little brother.

14 Q: I want to talk about what happened at the Boals Motel this
15 morning. How did your day begin?

16 **A:** My brother called me around 9:00am that morning and asked me
17 to come down to the Motel. He said he was staying there and
18 that I should come hang out.

19 **Q:** Did he tell you why he wanted you to come hang out.

20 **A:** Nope.

21 **Q:** Was that common?

22 **A:** We had hung out there before. People like to party there,
23 but I'd say that was the first time he'd ever called me in the
24 morning to swing by.

25 **Q:** 9:00am? That's kinda early to just hang out, what do you do
26 for work?

27 **A:** I'm a delivery driver for Amazon, but today was my day off.

28 **Q:** What time did you get to the Boals Motel?

29 **A:** Around 9:30.

30 **Q:** What happened then?

31 **A:** My brother said we should go get some breakfast.

32 **Q:** So, he told you to come over, and then told you to leave?

33 **A:** I guess.

34 **Q:** What happened when you went to get breakfast?

35 **A:** We walked through the breezeway over to the parking lot and
36 Ryan Wilson started running his big mouth.

37 **Q:** What did he say?

38 **A:** Normal crap - like this is my turf and just keep walking, you
39 don't want to get hurt. He is always talking smack and

40 threatening people. Makes good on it sometimes too. Everyone
41 knows he's got a body count, but no one dares rat. It's how
42 he's stayed in power for so long.

43 **Q:** In power?

44 **A:** Don't play dumb Detective. You all know Wilson runs the
45 entire area where the Boals Motel is located. He's got a crew,
46 enforcers, eyes on the street corners, everything. No one goes
47 in or out of the Boals Motel without Wilson knowing about it.

48 **Q:** Then why go there?

49 **A:** Because we all go there to party. It's a neighborhood thing.
50 We all know each other, at least vaguely. But it's definitely
51 Wilson's turf. That's why he always has that room right on the
52 end. The manager always keeps it available for him. He's on
53 the roll.

54 **Q:** The roll?

55 **A:** Wilson's payroll. Come on Detective, I know you're not in
56 Narcotics, but don't tell me you don't know Wilson is one of the
57 biggest drug dealers in Stetson.

58 **Q:** I'll follow up with our narcotics bureau. So how did you and
59 your brother get along with Wilson?

60 **A:** Overall, fine. Wilson never bothered me, but I also stayed
61 out of his way. My little brother though, he doesn't like what
62 Wilson has done to the neighborhood.

63 **Q:** What do you mean?

64 **A:** My brother believes in fairness, equity. Doesn't think one
65 man should have it all or run everything by himself - thinks the
66 wealth should be spread around. But if someone does, shall we
67 say, corner the market, it should be him. He's a little
68 arrogant like that. I keep telling him he doesn't want those
69 targets on his back, but he always says he can handle it through
70 peaceful talk and negotiation. He hates violence. He's always
71 breaking up fights and telling people to calm down and that
72 violence is never the answer. Unfortunately, I always tell him
73 that's not how the world works. He'll grow up some day, if he
74 lives that long. Damn kid thinks he's invincible. And today
75 just reaffirmed that. I digress, anyway, he wants to be like
76 the neighborhood Robin Hood. Clean up the streets and do
77 whatever he needs to do to give money back to the community. He
78 wants people to be able to live peacefully and not in fear of
79 Wilson and his crew.

80 **Q:** So, he's peaceful, but he carries a gun?

81 **A:** Look detective, you can be peaceful and nonviolent and still
82 not be an idiot. There is a difference between having a gun for
83 protection and actually using it to intentionally harm another
84 person, unless of course it's in self-defense, which is exactly
85 what happened here. These Stetson streets are tough. You gotta
86 protect yourself.

87 **Q:** Do you carry a gun?

88 **A:** Hell yes. Totally legal.

89 **Q:** So, let's get back to what happened when you went to
90 breakfast.

91 **A:** Right, so Wilson says something like "this is my turf, just
92 keep walking, you don't want to get hurt." My brother just
93 ignored him like he always does. Said nothing.

94 **Q:** Did you say anything?

95 **A:** I might have mumbled something under my breath calling Wilson
96 a vulgar name I won't repeat here, but I didn't say anything
97 loud enough that he could have heard.

98 **Q:** What happened next?

99 **A:** Me and Jay went to a nearby diner and got some food. Then we
100 walked back to the Motel.

101 **Q:** How was Jay acting at breakfast?

102 **A:** Normal. He wasn't agitated or worked up or anything, if
103 that's what you mean.

104 **Q:** Well, I didn't say that, you did. Did Wilson come up at all?

105 **A:** Maybe once or twice, but I don't remember any specifics.

106 **Q:** Did he seem angry at all?

107 **A:** No.

108 **Q:** Did he threaten Wilson at all?

109 **A:** No. Why would he? Wilson wasn't even there.

110 **Q:** What did you do when you were done with breakfast?

111 **A:** I said we should go downtown and hang out. Jay said that was
112 a good idea, but he wanted to go back to the Motel first to get
113 some things.

114 **Q:** What happened next?

115 **A:** So, we walked back. I took my leftovers with me. As we
116 approached the Motel, I heard Jay say something like, "Wilson's
117 still out there." I said, "Of course he is, he always is, you
118 gotta let it go man." I noticed at that point that my shoelace
119 was untied so I bent down to tie it.

120 **Q:** Did Jay wait for you?

121 **A:** No, he kept walking.

122 **Q:** What happened next?

123 **Q:** We walked into the parking lot, and I saw Wilson watching Jay
124 like a hawk. I started to get worried. You could just feel the
125 tension. Wilson looked like he was holding a gun in his pocket.

126 **Q:** You say he looked like he was holding a gun, did he gesture
127 or move or insinuate in any way that he was holding a gun?

128 **A:** No.

129 **Q:** Then why did you think he was armed?

130 **A:** I guess it was just the way he was standing. I don't know.
131 Gut feeling, I guess.

132 **Q:** What happened next?

133 **A:** Jay needed to let Wilson know that he was armed so that
134 Wilson would think twice before making a move. Jay didn't show

135 his gun or anything, but he made a gesture with his left hand in
136 the shape of a gun and said, "pop pop."

137 **Q:** Was his left hand pointed at Wilson when he did that?

138 **A:** No, it was more like up in the air, a general reference, like
139 I've got a gun don't mess with me. We just wanted to go back to
140 Jay's room, grab some stuff, and leave. We weren't looking for
141 trouble.

142 **Q:** How did Wilson respond?

143 **A:** He raised his hands up in the air and was like "Let's F***ing
144 go!" It was aggressive and loud - a really big movement - like
145 he threw his arms high up and from where I was I could clearly
146 see he was holding a gun in his hand. I screamed for my brother
147 to watch out.

148 **Q:** Do you remember what you said?

149 **A:** Yeah, I yelled, "Yo watch out man!"

150 **Q:** Where was your brother at this point?

151 **A:** Like on the side of the cars, walking toward the breezeway
152 area. My brother wasn't even looking in Wilson's direction -
153 his hood was up, and he was just facing forward. No way Jay
154 started this.

155 **Q:** What happened next?

156 **A:** Jay walked into the breezeway, and I saw Wilson walk over to
157 the corner - like he was following Jay - and he had his gun
158 drawn down by his side. Jay must have heeded my warning that I

159 yelled out a few seconds before that because that's when I heard
160 the shots ring out.

161 **Q:** Did you see who shot first?

162 **A:** From my angle, I couldn't tell who shot first, but no way it
163 was Jay. And if it was, he was just defending himself. Wilson
164 was stalking him with his gun out like prey to be killed while
165 Jay had his back turned to him.

166 **Q:** Where were you at this point?

167 **A:** Crouched behind the trunk of a small white four door car that
168 was in the first parking spot closest to where the shooting
169 occurred.

170 **Q:** I'm showing you video surveillance footage from that day
171 (Exhibit 8). Does it fairly and accurately represent what
172 occurred?

173 **A:** [Watches video.] Yup, that's what happened.

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

175 **A:** Yeah, Jay my brother is in the red sweatshirt. I am the guy
176 walking behind him in the purple t-shirt holding the to-go bag
177 of food, Wilson is standing in front of the Motel in the white
178 t-shirt, and I don't know who the kid in the black t-shirt is,
179 or the guy sitting in the chair who stands up. I've seen them
180 before though. They are part of Wilson's crew - his muscle -
181 but I don't know their names.

182 Q: I'm showing you a still shot of the video. Can you just
183 indicate with a yellow arrow where you were taking cover during
184 the gunfire?

185 A: Sure, right here.

186 Q: Great, thanks. We'll mark this as Exhibit 8A for the
187 State's Attorney's Office. OK, so what happened next?

188 A: My brother shot at Wilson a few times in defense of his own
189 life. Like I said, my brother is a kind and peaceful person, no
190 way he shoots unless he believed Wilson was going to kill him.
191 And of course he was - Wilson fired multiple rounds at my
192 brother.

193 Q: Tell me more about what you saw during the shooting?

194 A: Well, it looked like my brother hit Wilson in the left chest
195 area because the left side of his body fell backward and he kind
196 of spun to the left and took another shot with the gun that was
197 in his right hand as he was falling backward. Then it looked as
198 if Wilson was trying to turn and run away like a little coward
199 as my brother was stepping into him, but he fell down. I'm not
200 sure if he tripped or lost his balance or what, but he kind of
201 stumbled down toward the ground as he was trying to run away and
202 dropped the gun. As all that was happening Jay fired and it hit
203 Wilson in the back. It all happened so fast.

204 Q: What happened next?

205 **A:** Jay yelled for me to grab the gun so that Wilson couldn't
206 pick it back up and keep shooting at him. I did, and then we
207 ran away because we didn't know if Wilson's crew was going to
208 try to kill us next.

209 **Q:** I'm showing you another still shot from the video
210 surveillance. Can you draw a red circle where Wilson was lying
211 on the ground?

212 **A:** Sure, right here.

213 **Q:** And now can you put a green X where the gun was when it was
214 on the ground and you grabbed it?

215 **A:** Sure, right here.

216 **Q:** Great, thanks. We'll mark this as Exhibit 8B for the State's
217 Attorney's Office. Now obviously Exhibit 8B is not to scale, so
218 how far would you say Mr. Wilson was from the gun at the time
219 both he and the gun were lying on the ground?

220 **A:** About 2 feet, like an arm's length.

221 **Q:** And how far was Wilson from your brother when he fell?

222 **A:** Not far, maybe like 8 or 10 feet.

223 **Q:** And do you recall your brother firing the shot that struck
224 Mr. Wilson in the back before or after Mr. Wilson dropped the
225 gun?

226 **A:** I'm not sure, it all happened really fast and kind of like
227 all at the same time. I remember hearing a shot and the gun kind
228 of bounce on the ground, but I don't know in what order those

229 two things happened. But either way, Wilson had just shot at
230 Jay as he was falling to the ground in that kind of spin move I
231 mentioned, so no matter what Jay was just defending himself.

232 **Q:** But you said it looked like Mr. Wilson was trying to run
233 away?

234 **A:** Yeah, it looked like that. But I can't read people's minds.
235 He could have turned around and shot him again. Who knows.
236 That's why Jay told me to grab the gun off the ground so he
237 couldn't get it again and that we needed to get the hell out of
238 there.

239 **Q:** So, what happened next?

240 **A:** I grabbed the gun, and we ran to Jay's room. We dumped the
241 guns and Jay was bleeding really badly. Bleeding all over the
242 carpet.

243 **Q:** What room was Jay staying in?

244 **A:** 1077

245 **Q:** Showing you a picture we took of the blood on the carpet in
246 room 1077 (Exhibit 6). Is that the blood you mentioned?

247 **A:** Yes, it was a lot. I was worried about him. I knew we
248 needed to get him to an emergency room. But I also knew he had
249 a gunshot wound and I was scared of Wilson and his crew - I
250 didn't want them to come to the hospital and retaliate in some
251 way. So, I got Jay out of Pinella County and took him over to
252 Hillsboro. I would have gone further if I could have, but Jay

253 was in bad shape. Losing blood, in and out of consciousness, so
254 I went as far as I safely could.

255 **Q:** Is there anything about what happened that you haven't told
256 me?

257 **A:** No, that's it. But I'll reiterate, my little brother was
258 just defending himself. I love him and he's a good kid. Please
259 don't jam him up for protecting his own life.

I have reviewed the above transcript of my interview with Detective Hernandez, and I affirm under penalty of perjury that it is true, accurate, and complete.

Signature: *Greg Cameron*

Date: August 6, 2022





Petersburg Police Department



102 Freemont Way
Petersburg, Stetson 33713
Main: 727-813-2300
Emergency Dispatch: 911

Incident Report

☐ Narrative

☒ Supplement

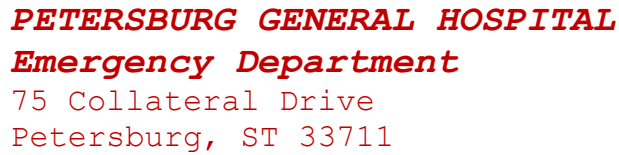
<u>Date of Incident</u> 8-6-22	<u>Time of Incident</u> 10:30am	<u>Officer Badge Number</u> 813	<u>Case Number</u> 23-00517
<u>Suspect</u> Jay Cameron Ryan Wilson	<u>Incident Type</u> <input checked="" type="checkbox"/> Criminal <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Violation <input type="checkbox"/> Other	<u>Arrest Status</u> <input type="checkbox"/> On-Site <input type="checkbox"/> Warrant <input checked="" type="checkbox"/> Investigation ongoing	<u>Citation Number</u> N/A

After leaving Hillsboro County Medical Center I went to Petersburg General Hospital to check on the status of Ryan Wilson. When I arrived, I was told he was undergoing emergency surgery and, if he survives, would not be in any condition to speak with me for at least a few days. Given the amount of narcotics and packaging materials for street level distribution that were found in the motel room registered under his name, and, having run his Record of Arrest and Prosecution and learning he was a convicted felon who had possessed a firearm earlier that day, I informed the hospital staff that Mr. Wilson was under arrest for narcotics trafficking and being a felon in possession of a firearm and a patrol officer is to be positioned outside his hospital room at all times as he is not free to leave. I also informed the hospital staff that they should have received a subpoena from the State's Attorney's Office for Mr. Wilson's medical records. The staff checked and they had in fact received that subpoena just a few moments earlier. As such, I was provided with a Summary Report of Emergency Medical Treatment. I then left to go back to the Police Department to formally interview Kenny Gray.

Officer Name: Michelle Hernandez (813)

Officer Signature: *Michelle Hernandez*

Date of Incident Report: 08-06-2022



SUMMARY REPORT OF EMERGENCY MEDICAL TREATMENT

DATE/HOUR TREATMENT:	PERFORMED BY: Dr. Paola
08-06-22; 10:50am	ED Case #: 2022-8097

Patient 1: Ryan Wilson Sex: M Age: 38

Home Address: Unknown.

Date of Incident: 08-06-22

Time of Admission: 10:50am

Arrival Method: () Walk-in (X) Ambulance

SUMMARY DIAGNOSIS

Patient presented with two perforating gunshot wounds: one to the upper left chest and the second to the lower right side of the back. Presented with hypotension from severe blood loss and hypovolemic shock. Massive transfusion protocol initiated and sent for emergency CT scans to determine the projectile's trajectory through the body followed by emergency surgery to attempt to repair internal organ and tissue damage. Status critical.

Jennifer M. Paola

Jennifer M. Paola, M.D.
Chief Physician, Emergency Department
Petersburg General Hospital

Petersburg Police Department



102 Freemont Way
Petersburg, Stetson 33713
Main: 727-813-2300
Emergency Dispatch: 911

Interview with Kenny Gray

1 **Q:** This is Detective Michelle Hernandez. I'm here with Kenny
2 Gray and he has voluntarily submitted to be interviewed about
3 what happened this morning at the Boals Motel. Kenny, you are
4 not under arrest, and you are free to leave at any time. Do you
5 understand that, and do you wish to voluntarily be interviewed
6 at this time?

7 **A:** Yes.

8 **Q:** Ok. To start, what is your full name?

9 **A:** Kenneth Derek Gray, but I go by Kenny.

10 **Q:** How old are you?

11 **A:** 36

12 Who is the young man who was shot today at the Boals Motel?

13 **A:** Ryan Wilson.

14 **Q:** How do you know him?

15 **A:** We went to high school together. We're friends, we hang out
16 often.

17 **Q:** Does he live at the Boals Motel?

18 **A:** No, he lives with his girlfriend downtown, but he rents a
19 room there regularly when he is on the outs with his girlfriend,
20 which is often. They pretty much define on-again, off-again.

21 **Q:** What does Ryan do for work?

22 **A:** We both work construction on and off. I don't know what else
23 he does, but he always describes himself as an entrepreneur.

24 **Q:** What room was he renting on August 6th, 2022?

25 **A:** Room 1045. He always rents that room. It's always available
26 for him. I swear the manager keeps it open for him.

27 **Q:** What do you do when you visit him there?

28 **A:** We hang out, party. Friends come by to visit. It's always a
29 good time, we're a tight group.

30 **Q:** What do you mean tight group?

31 **A:** Ryan doesn't like outsiders. And he's in charge. All the
32 time. We're like a family, we're close. Ryan always knows
33 who's coming and going. People are only allowed to come by if
34 it's cleared with him ahead of time and he knows they are
35 coming. He doesn't like new faces.

36 **Q:** Let's talk about what happened this morning. Can you tell me
37 how it all started?

38 **A:** Yeah around 9:45 this morning this dude in a red sweatshirt
39 walked by Ryan's room and said, "This will be my turf soon."
40 Ryan was sitting in a chair at the time and stood up and said,

41 "Are you threatening me?" The guy replied, "Hell yes - just
42 wait."

43 **Q:** Had you ever seen the guy in the red sweatshirt before?

44 **A:** I had seen him around before. Always walking by and watching
45 Ryan from afar. But I never heard him say anything until today.

46 **Q:** Do you know his name?

47 **A:** I just know he goes by Jay. I don't know his last name or
48 really anything else about him.

49 **Q:** Was he alone?

50 **A:** I saw another guy with him. Don't know who he is.

51 **Q:** What happened next?

52 **A:** They both walked away, and Ryan went into his room.

53 **Q:** What for?

54 **A:** Don't know, what am I? A babysitter? But when he came back
55 out he was stuffing something into his right pocket.

56 **Q:** What?

57 **A:** I didn't see exactly what it was. It looked like a gun, but
58 I couldn't say for sure. All I saw was a black object. Could
59 have been a cell phone, I don't know. But I do know Ryan looked
60 angry - he spit on the ground and shook his head and said, "Let
61 him try. Everyone knows this is my turf."

62 **Q:** What happened next?

63 **A:** The two guys showed back up about 45 minutes later and all
64 hell broke loose. The guy in the red sweatshirt walked into the

65 parking lot with his hood up - it looked like something was
66 about to go down. He had his right hand in the front pocket of
67 his hoodie. It looked like he was holding a weapon - probably a
68 gun - and that something was about to go down. I got freaked
69 out - I was really on edge - and then I heard the dude in the
70 red sweatshirt say, "pop pop - you're done" and he made a
71 gesture with his left hand toward Ryan, but I couldn't really
72 see what he was doing with his left hand. I just saw him move
73 it quickly.

74 **Q:** Why do you say probably a gun?

75 **A:** What else was it gonna be? I've been living in this area my
76 entire life and I'm not stupid. I got what you call street
77 smarts, you know? I know what it looks like when someone's
78 packing.

79 **Q:** What did Ryan do?

80 **A:** Nothing. He didn't react at all as the dude walked by.
81 Literally didn't move a muscle. Just watched him.

82 **Q:** What happened next?

83 **A:** After the dude walked into the breezeway by the stairs to the
84 second floor, Ryan walked over to the edge of the wall because he
85 wanted to see where the guy was going, and that's when the shots
86 started.

87 **Q:** Who shot first?

88 **A:** Dude in the red sweatshirt. That's when Ryan returned fire.

89 **Q:** Did Ryan say anything before the shots went off?

90 **A:** No. Not a word.

91 **Q:** What about anyone else in the area? Did you hear anyone else

92 yell anything at all during this time?

93 **A:** No. I would have noticed. I actually remember the air was

94 filled with like a heavy silence. It was almost like the silence

95 was actually loud before those shots went off. It was weird.

96 **Q:** Did you see how or when Ryan pulled his gun out?

97 **A:** No. I saw the kid in the red sweatshirt walk into the breezeway,

98 then I saw Tony D. stand up and say, "Yo, I'm out." And he shook

99 hands with Ryan and then Ryan walked over to the corner to see

100 where the dude went. And then the shooting started.

101 **Q:** What happened next?

102 **A:** Ryan kind of fell backward. It looked like he had been hit in

103 the chest. Ryan turned around and tried to run away but the dude

104 fired another shot into Ryan's back and that's when Ryan fell to

105 the ground. I heard him moan as he fell and also a noise like a

106 metal object dropping against concrete.

107 **Q:** Where were you at this time?

108 **A:** Taking cover behind the white and silver SUV in the parking

109 lot.

110 **Q:** Showing you the video surveillance footage (Exhibit 8), does

111 that fairly and accurately reflect what happened that day?

112 **A:** Yeah, definitely.

113 Q: Can you identify Ryan Wilson?

114 A: He is the guy standing there in the white t-shirt.

115 Q: Can you identify yourself in the video?

116 A: That's me in the black t-shirt and shorts kind of walking in
117 front of Ryan at one point.

118 Q: Who's the guy you mentioned you knew as Jay?

119 A: The guy in the red sweatshirt.

120 Q: Do you know who the guy is walking behind Jay?

121 A: Don't know him, but that's the same dude I saw leave with Jay
122 earlier in the morning, and who grabbed Ryan's gun before they ran
123 away.

124 Q: And what about this person who appears to stand up out of the
125 chair at one point?

126 A: That's Tony D. He took off running when the shooting started.

127 Q: I'm showing you a picture of a still shot from that footage.
128 We'll call this Exhibit 8C. Can you circle with a blue marker
129 where you were located during the shooting?

130 A: Sure. There you go. Right between those two cars, basically
131 taking cover behind the hood of the SUV.

132 Q: And can you circle with a red marker where Ryan fell to the
133 ground during the shooting?

134 A: Sure. There you go.

135 Q: OK what happened after Ryan fell to the ground?

136 **A:** The dude in the red sweatshirt said to the guy he was with "yo
137 quick get the piece so he doesn't keep shooting - we gotta get out
138 of here."

139 **Q:** What happened then?

140 **A:** The guy ran over to near where Ryan was and bent down. I
141 couldn't see what he picked up from my angle, but then I saw the
142 two guys take off running down the breezeway.

143 **Q:** Did he touch Ryan at all?

144 **A:** I don't know - I couldn't see from my angle, but I didn't hear
145 Ryan moan and it didn't appear like he reacted in any way. I could
146 see the guy was right near Ryan though and I heard like metal
147 scraping against the ground, and then the two guys took off running
148 down the breezeway.

149 **Q:** What did you do next?

150 **A:** I immediately called 911.

151 **Q:** Is there anything else that happened that you haven't mentioned?

152 **A:** No.

153 **Q:** OK Kenny, before we wrap up here I gotta ask you about something
154 related. We found a lot of drugs in Room 1045. You want to tell
155 us anything about that?

156 **A:** Look man, I don't know anything about any drugs. I like to
157 party with my friends - drink, smoke some weed, but that's it. I
158 don't know anything about anything other than that.

159 Q: Had you been drinking or smoking on the morning of August 6,
160 2022?

161 A: I was pretty hungover from partying the night before - I had
162 passed out and slept on the floor of Ryan's room - so when I woke
163 up around 9:00am I took a hit or two of weed because that usually
164 does the trick to make me feel better, so yeah, I had smoked a
165 little that morning.

166 Q: Did that impact your ability to see or perceive what happened?

167 A: Nah, it was just a puff or two from a joint. I got a high
168 tolerance. Just needed a little something to take the edge off.
169 Plus, watching your buddy get shot will sober you up pretty quick.

170 Q: Will you voluntarily submit to a drug test?

171 A: Hell no. We done here?

172 Q: Yes, thank you.

I have reviewed the above transcript of my interview with Detective Hernandez, and I affirm under penalty of perjury that it is true, accurate, and complete.

Signature: Kenny Gray

Date: August 6, 2022



Arrest and Conviction Record of Kenneth Gray

NAME/ GRAY, KENNETH
SDL/N9134588
SSN/64677895

ARR/DET/CITE/CONV:

#1

11-02-2019 ARREST CC 57967 POSSESSION OF NARCOTICS, FELONY

12-09-2019 CONVICTED, PLEA OF GUILTY, 1 YEAR JAIL, 1 YEAR PROBATION, FINE
\$500

Petersburg Police Department



102 Freemont Way
Petersburg, Stetson 33713
Main: 727-813-2300
Emergency Dispatch: 911

Interview with Ryan Wilson

1 **Q:** This is Detective Michelle Hernandez. I'm here with Ryan
2 Wilson and he has voluntarily agreed to be interviewed about the
3 shooting that occurred a week ago on August 6, 2022, at the
4 Boals Motel. Mr. Wilson's attorney is present. Mr. Wilson has
5 an attorney because he has been charged in a separate case
6 stemming from this incident; specifically, Felon in Possession
7 of a Firearm and Felony Possession with Intent to Traffick
8 Narcotics as a result of the drugs and packaging materials that
9 were found in a room registered under Mr. Wilson's name at the
10 Boals Motel. Mr. Wilson has pleaded not guilty to those charges
11 and is hoping his cooperation with this investigation will
12 result in the State's Attorney's Office recommending a reducing
13 sentence on the drug charges. Is that all correct, Mr. Wilson?
14 **A:** Yes.

15 Q: I want to be clear, you do not have any kind of formal
16 cooperation agreement with the State's Attorney's Office though,
17 correct?

18 A: No. Just hoping they will be lenient given that punk tried
19 to kill me. I'm hoping if I tell the truth and give them the
20 evidence to convict that punk, I might get some credit in my
21 case. So, I'm Livin' on a Prayer, you might say.

22 Q: Ok. And I also want to be clear as to why this interview is
23 happening a week after the incident. Can you explain where you
24 have been?

25 A: At the hospital. I had a bunch of surgeries after the
26 shooting. But I'm expected to make a full recovery.

27 Q: You are still in the hospital, which is where this interview
28 is taking place, are you of sound mind and body now?

29 A: Yes.

30 Q: Are you on any narcotic pain medication at this time?

31 A: No, just prescription strength Ibuprofen every 4 hours. I
32 like having a clear head. I don't take drugs. It's not good
33 for business.

34 Q: Ok, so let's start, what is your full name?

35 A: Ryan Timonthy Wilson.

36 Q: How old are you?

37 A: 38

38 Q: What do you do for work?

39 **A:** I'm a businessman, an entrepreneur you might say - I dabble
40 in all kinds of work to pay the bills.

41 **Q:** Looking at Exhibit 12, you've got quite the record, Mr.
42 Wilson.

43 **A:** Just in the wrong places at the wrong times.

44 **Q:** Seems to happen to you a lot.

45 **A:** You got a question about the kid who tried to kill me? Cause
46 otherwise we're done.

47 **Q:** Ok, let's talk about the morning of August 6, 2022. How did
48 your day start?

49 **A:** I woke up around 8:00am. Had some friends over to party the
50 night before. I personally don't do drugs, but I like to host
51 events where people can enjoy themselves.

52 **Q:** Why the Boals Motel?

53 **A:** That's just where we like to hang out. People can swing by,
54 say hi, then leave. Of course, I always know who is coming and
55 going.

56 **Q:** So, you wake up the morning of August 6th, then what?

57 **A:** My girlfriend brought be some coffee. We had been arguing
58 the last few days, but she always comes around. We talked for a
59 little while and then she left around 9:30am to go to work. I
60 was just hanging with my boys getting a little fresh air when
61 that punk kid walked by around 9:45.

62 **Q:** Had you seen the guy you described as a punk kid before?

63 **A:** I'd see him around the Motel from time to time, always
64 watching me. At first, I just laughed it off - little wannabe -
65 but then I heard through the grape vine that he was running his
66 mouth. Saying that I wasn't giving big enough cuts, wasn't
67 sharing enough of the block. That he wanted my turf. Things
68 like that. Punk kid had no idea what he was talking about.

69 **Q:** So, what happened then?

70 **A:** Kid walked by me and said, "This will be my turf soon." I
71 was sitting in a chair when he said that and I thought it was
72 hysterical. Like how dare this kid challenge me? So, I stood
73 up and said something like, "You must be sick in the head
74 because I know you're not threatening me like that!" He replied
75 something like, "Just you wait and see old man." Pssh, old
76 man. Child punk please. Kid clearly wasn't right in the head.
77 No one talks to me like that.

78 **Q:** What happened next?

79 **A:** Nothing. Kid walked away with some dude at his heels. I
80 went into my room to use the bathroom and then came back out and
81 kept hanging with my friends.

82 **Q:** Did you get a gun out of your room.

83 **A:** No sir. I'm a convicted felon. I don't carry a firearm.

84 **Q:** So what did you have in your right pocket?

85 **A:** My cell phone.

86 **Q:** You got that cell phone around here somewhere?

87 **A:** Yea.

88 **Q:** Can I look at it?

89 **A:** Yeah, you can look at it. I'm not giving you permission to
90 search it though.

91 **Q:** That's fine, don't need to do that right now. I just want to
92 see it. That OK?

93 **A:** Yeah, sure. Here you go.

94 **Q:** [Ryan pulls out his cell phone]. Mind if I take a picture?

95 **A:** No, go ahead.

96 **Q:** Got it. I'll label this Exhibit 13.

97 **Q:** What happened next?

98 **A:** About 45 minutes later the punk kid comes back. This time it
99 was obvious he was looking to start a fight. He had his hood
100 pulled all the way up over his head and like tied tight around
101 his face like he was trying to hide his identity. Which was
102 stupid because it wasn't like I didn't already know who he was.
103 But he was probably trying to hide his face from the security
104 cameras. Anyway, he was walking fast, and he had his right hand
105 stuffed into the front pocket of his sweatshirt and it looked
106 like he was holding an object in his right hand.

107 **Q:** Did you see what it was?

108 **A:** Not specifically, I could just tell he was holding something
109 in his pocket. I didn't know for sure what it was, but it could
110 have been a cell phone. I mean, phones can easily fall out of

111 hoodie pockets, so I always hang onto my phone when I got a
112 hoodie on and it's in that front pocket. Don't want it to fall
113 out and break, especially when I'm walking fast like he was.

114 **Q:** Did you think it was a gun?

115 **A:** I mean, it crossed my mind that it could have been, and now I
116 know for sure it was, but I honestly didn't believe this kid was
117 gonna be stupid enough to pull a gun on me in broad daylight.

118 Also, he was making some weird movement with his left hand, but
119 I couldn't really make out what it was. If anything, I thought
120 he was trying to distract me somehow.

121 **Q:** Did you hear him say anything?

122 **A:** I heard him mutter a few words, but I couldn't make out what
123 they were. I definitely was on edge though because I wasn't
124 sure what was about to happen.

125 **Q:** Did you do anything at that time?

126 **A:** Nope. I just stared at him and watched him as he walked
127 toward me. I didn't say or do anything. I just waited to see
128 what he was going to do. I just kept thinking, "What the hell
129 is this kid up to? Maybe he's high or something."

130 **Q:** What happened next?

131 **A:** Well right before he entered the Breezeway area he gave me
132 like this real hard stare and I kind of reacted by moving my
133 arms out like "what do you want?" And then he moved his left
134 hand up toward his hood like as if he was gonna take it off or

135 push it back off his face and in the process his made a fist
136 with his thumb out and made like a quick sliding motion with is
137 thumb across his neck.

138 **Q:** What did you understand that motion to mean?

139 **A:** That he was threatening to kill me.

140 **Q:** So, then what happened?

141 **A:** He walked into the breezeway, and I lost sight of him. My
142 buddy Tony D had stood up as this was happening and once the
143 dude went into the breezeway Tony handed me his gun and I walked
144 over to the edge of the wall to see where the guy was going.

145 **Q:** Why?

146 **A:** This guy had just threatened to kill me! I wasn't going to
147 just stand there with my back exposed to him. I wanted eyes on
148 him in case I needed to defend myself. And sure enough the dude
149 got into the breezeway and then immediately turned around,
150 pulled out the gun, and shot at me. I returned fire after he
151 shot first.

152 **Q:** What happened next?

153 **A:** I was backing up and he kept coming at me. He had shot me in
154 the upper left part of my chest at this point and I was falling
155 backward. I knew I was exposed, so I turned around to try to
156 run away but I was wearing slides which are difficult to run or
157 move quickly in because they are so unsteady and have no
158 support, so I basically slipped out of my shoes, tripped, and

159 fell down as I was turning to try to run away. I couldn't put
160 my left arm down to catch myself because it was in so much pain
161 from being shot, so I dropped the gun out of my right hand and
162 tried to steady myself to keep running. But then the dude got
163 another shot off that hit me in the back. The pain seared
164 through my entire body, and I fell to the ground. That's the
165 last thing I remember.

166 Q: Before all the shooting started, do you remember anyone in
167 the area yelling at all?

168 A: No. I actually remember it being quiet.

169 Q: What's the next thing you remember?

170 A: Waking up in the hospital.

171 Q: I'm showing you the video surveillance from that day (Exhibit
172 8). Does it fairly and accurately depict what you recall
173 happening?

174 A: Of what it shows, yeah that's accurate.

175 Q: Showing you Exhibit 5. Do those look familiar?

176 A: Yeah. The smaller gun is the gun I used, the larger one
177 looks like the one that punk kid pulled on me.

178 Q: Is there anything else about what happened that you haven't
179 told me?

180 A: No. Just do me a favor and put a good word in for me with the
181 State's Attorney's Office. With my record, I'm looking at
182 serious time if I'm convicted of this drug stuff - my lawyer

183 tells me like 30 years - so I'm hoping for leniency given my
184 full cooperation here, especially since everyone in that office
185 knows I never cooperate. Shut up and lawyer up. That's my
186 motto.

187 **Q:** I'll be sure to pass along your message.

188 **A:** Thanks.

I have reviewed the above transcript of my interview with
Detective Hernandez, and I affirm under penalty of perjury that
it is true, accurate, and complete.

Signature: **Ryan Wilson**

Date: August 13, 2022

Arrest and Conviction Record of Ryan Wilson

NAME/ WILSON, RYAN
SDL/N7024377
SSN/535667984

ARR/DET/CITE/CONV:

#1

11-10-2006 ARREST CC 23152-DUI, MISDEMEANOR
11-22-2006 CONVICTED, PLEA OF GUILTY, MISDEMEANOR DUI: SEN. 2 YEARS
FORMAL PROBATION, 2 DAYS COUNTY JAIL, FINE \$750
04-27-2007 VIOLATION OF PROBATION, REVOKED & REINSTATED, 30 DAYS JAIL

#2

04-03-2008 ARREST CC 14578 AGGRAVATED BATTERY, FELONY
06-27-2008 CONVICTED, PLEA OF GUILTY, 2 YEARS PRISON, 3 YEARS PROBATION,
FINE \$2,500, RESTITUTION
01-17-2011 VIOLATION OF PROBATION, REVOKED, 1 YEAR PRISON

#3

06-02-2012 ARREST CC 57968 SALE OF NARCOTICS
07-08-2012 CONVICTED, PLEA OF GUILTY, 3 YEARS PRISON, \$5,000 FINE

#4

11-02-2015 ARREST CC 14577 SIMPLE BATTERY, MISDEMEANOR
12-09-2015 CONVICTED, PLEA OF GUILTY, 6 MONTHS JAIL, FINE \$100, RESTITUTION

#5

10-02-2016 ARREST CC 14579 AGGRAV. BATTERY W/ SERIOUS INJURY, FELONY
2-09-2017 CHARGES DISMISSED; VICTIM REFUSED TO COOPERATE

#6

11-02-2017 ARREST CC 57967 POSSESSION OF NARCOTICS, FELONY
12-09-2017 CONVICTED, PLEA OF GUILTY, 18 MONTHS JAIL, FINE \$1,000

#7

10-02-2019 ARREST CC 14579 AGGRAV. BATTERY W/ SERIOUS INJURY, FELONY
03-09-2020 CHARGES DISMISSED; VICTIM REFUSED TO COOPERATE

EXHIBIT 13



Petersburg Police Department



102 Freemont Way
Petersburg, Stetson 33713
Main: 727-813-2300
Emergency Dispatch: 911

Incident Report

 Narrative

 X Supplement

<u>Date of Incident</u> 8-6-22	<u>Time of Incident</u> 10:30am	<u>Officer Badge Number</u> 813	<u>Case Number</u> 23-00517
<u>Suspect</u> Jay Cameron Ryan Wilson	<u>Incident Type</u> <u> X </u> Criminal <u> </u> Motor Vehicle <u> </u> Violation <u> </u> Other	<u>Arrest Status</u> <u> </u> On-Site <u> </u> Warrant <u> X </u> Investigation ongoing	<u>Citation Number</u> N/A

Having reviewed and secured all the evidence available and conducted all possible interviews, I turned the case over to the State's Attorney's Office for a charging decision on this shooting.

Officer Name: Michelle Hernandez (813)

Officer Signature: *Michelle Hernandez*

Date of Incident Report: 08-13-22

IN THE SUPERIOR COURT OF THE STATE OF STETSON
PINELLA COUNTY JUDICIAL DISTRICT

STATE OF STETSON

vs.

JAY CAMERON

DOCKET NO: 2023-CR-319

Long Form Information

COUNT ONE: Attempted Murder in the Second Degree

In the Superior Court of the State of Stetson for the Judicial District of Pinella County, the State of Stetson accuses Jay Cameron of Attempted Murder in the Second Degree and charges that in the City of Petersburg on or about August 6, 2022, the said Jay Cameron, with depraved mind regardless of human life attempted to unlawfully kill another human being, to wit: Ryan Wilson, by an imminently dangerous act, to wit: shooting a firearm, in violation of Stetson General Statutes §§ 782.04 and 777.04.

COUNT TWO: Carrying a Concealed Weapon

In the Superior Court of the State of Stetson for the Judicial District of Pinella County, the State of Stetson accuses Jay Cameron of Carrying a Concealed Weapon and charges that in the City of Petersburg on or about August 6, 2022, the said Jay Cameron was not licensed to carry a concealed firearm and carried a concealed firearm on his person in such a manner as to conceal the weapon from the ordinary sight of another person, to wit: Ryan Wilson, in violation of Stetson General Statutes § 790.01.

STATE OF STETSON

Taylor Zubrerre

Taylor Zubrerre, Esq.
Assistant State's Attorney
August 22, 2022

SUPERIOR COURT OF STETSON
County of Pinella

**WARRANT
OF
ARREST**



THE PEOPLE OF THE STATE OF STETSON
To any Stetson Police Officer

Warrant No. 857-91
PPD Case # 23-00517

Defendant's Name: Jay Cameron

Order: A complaint on oath establishing probable cause having been filed with this Court on this date charging the defendant listed above with the crime(s) specified below, you are commanded forthwith to arrest the above-named defendant and bring him before me, or in case of my absence or inability to act, before the nearest and most accessible judge in this county.

Crimes: Probable Cause has been found, and the defendant has been formally charged, with the following crimes:

1 COUNT: Attempted Murder in the Second Degree in violation of Stetson General Statutes §§ 782.04 and 777.04.

1 COUNT: Carrying a Concealed Weapon in violation of Stetson General Statutes § 790.01.

Night Service Authorization [If checked]

☒ **Felony:** This felony warrant may be executed at any hour of the day or night.

☐ **Misdemeanor:** Good cause for night service having been established in the supporting declaration, this misdemeanor may be executed at any hour of the day or night.

Bail: ☒ \$2,000,000 cash/surety _____ ☐ No Bail

August 22, 2022, 1:45pm
Date and Time Warrant Issued

The Honorable Omar Prince
Judge of the Superior Court

Arrestee Information

For Identification Purposes Only

Name: Jay Cameron (no known AKA's)

DOB: 01-05-1998

Last known address(es): 1 Eastern Court, Unit 7, Petersburg, Stetson 33712

Sex: M Race: W/H Height: Approx. 6'0" Weight: Approx. 175lbs Hair Color: Brown Eye Color: Brown

Scars, Marks, Tattoos: Scar from gunshot wound to the right side of the abdomen.

Vehicle(s) registered to Arrestee: 2018 Honda Accord, Black, Tag LV1597

Petersburg Police Department



102 Freemont Way
Petersburg, Stetson 33713
Main: 727-813-2300
Emergency Dispatch: 911

Incident Report

☐ Narrative

☒ Supplement

<u>Date of Incident</u> 8-6-22	<u>Time of Incident</u> 10:30am	<u>Officer Badge Number</u> 813	<u>Case Number</u> 23-00517
<u>Suspect</u> Jay Cameron	<u>Incident Type</u> <input checked="" type="checkbox"/> Criminal <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Violation <input type="checkbox"/> Other	<u>Arrest Status</u> <input type="checkbox"/> On-Site <input checked="" type="checkbox"/> Warrant <input type="checkbox"/> Investigation ongoing	<u>Citation Number</u> N/A

On July 14, 2024, Suspect Jay Cameron was taken into custody following a routine patrol motor vehicle stop at which point an active warrant was found for his arrest. The undersigned was immediately notified, and the suspect was taken into custody and processed without incident.

Officer Name: Michelle Hernandez (813)

Officer Signature: *Michelle Hernandez*

Date of Incident Report: 07-14-24

IN THE SUPERIOR COURT OF THE STATE OF STETSON
PINELLA COUNTY JUDICIAL DISTRICT

STATE OF STETSON

vs.

JAY CAMERON

DOCKET NO: 2024-CR-319

ARRAIGNMENT TRANSCRIPT

July 15, 2024
9:00 a.m.
Courtroom 12A
Pinella County Courthouse

The Honorable Omar Prince, Presiding

Attorney for Prosecution: Taylor Zubrerre
Attorney for Defense: Hannah Milner

Prosecutor Zubrerre: The next case is 2024-CR-319.

Judge Prince: Sheriff, please bring the defendant out.

[Sheriff opens door, Defendant enters].

Judge Prince: Mr. Cameron, I am going to advise you of the charges against you. You have been 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 Statutes § 790.01. Attorney Milner of the Public Defender's Office has been appointed to represent you and it is my understanding you had an opportunity to meet with her in lock-up earlier this morning. Attorney Milner, how does your client plead?

Attorney Pyle: Not Guilty, Your Honor.

Judge Prince: Noted. What's the State's position on bail?

Prosecutor Hughes: Your Honor, the defendant has a minor criminal history. However, the charges against him are very serious and he is a flight risk given that authorities were unable to locate him for almost two years after the warrant and formal charges were issued. As such, the State asks that bail remain as set on the Warrant and an Order of No Contact be issued with respect to the Victim, Ryan Wilson.

Judge Prince: Attorney Milner?

Attorney Milner: Your Honor, my client has lived in Stetson, particularly Petersburg, his entire life. The police not being able to serve the warrant is not my client's fault and there is no evidence to even suggest he was trying to avoid or evade apprehension. On the contrary, he never left the city and was pulled over while driving in Petersburg for a minor traffic violation, which led to the service of the warrant. He was also compliant with officers when the warrant was served. Mr. Cameron only has one misdemeanor conviction and while I understand the charges are serious, I ask that Mr. Cameron be Released on a Promise to Appear given the fact that Mr. Cameron intends to file a Motion to Dismiss pursuant to Stetson General Statutes § 3.190(c)(3). Specifically, that Mr. Cameron is immune from prosecution under Stand Your Gound Immunity as set forth in Stetson General Statutes §§ 776.012 and 776.032 given the circumstances under which the shooting occurred. I have no objection to the State's request for a No Contact Order with Ryan Wilson.

Attorney Zubrerre: Your Honor, may I briefly respond?

Judge Prince: Yes.

Attorney Zubrerre: The State objects. A motion to dismiss based on immunity for justifiable use of deadly force requires the defense to make a prima facie claim that a defendant (1) had a reasonable belief that (2) their force was necessary to

prevent imminent death, great bodily harm, or the commission of a forcible felony; and (3) if Defendant was engaged in criminal activity at the time, they were unable to retreat and were in a location where they had the right to be. The fact that the defendant was carrying a concealed weapon at the time of this incident means he was engaged in unlawful activity and therefore did not have the right to "Stand His Ground," but rather had a duty to retreat before resorting to deadly force. The unlawful activity was the fact that he was carrying a concealed weapon. Although the State of Stetson no longer requires a license to carry a concealed firearm, this offense occurred on August 6, 2022, when carrying a concealed firearm without a license constituted a felony in Stetson. Additionally, the evidence in this case shows the defendant was the aggressor, and therefore he would not be entitled to "Stand His Ground" before using deadly force for that reason as well, and again would have been required to retreat.

Judge Prince: Alright. Bail is set at \$1,000,000 Cash/Surety. I am also issuing a No Contact Order with the alleged victim, Ryan Wilson. With respect to the motion to dismiss, I am ordering as follows:

Defense, you are hereby ordered to file a written Motion to Dismiss based on Stand Your Ground Immunity under Stetson General Statutes §§ 776.012 and 776.032; given the discussion on

the record today, there are two issues I want addressed in that Motion:

First, whether or not Mr. Cameron was engaged in unlawful activity at the time of this shooting by carrying a concealed weapon, which informs whether he may seek immunity under Stetson's Stand Your Ground law.

I will note that I agree with the State that although a new Stetson law went into effect on July 1, 2023, which permits concealed carry in the State of Stetson, this incident is alleged to have occurred in August 2022 when the concealed carry law was in effect. This is not an issue in controversy.

Second, whether Mr. Cameron was the aggressor in this incident, which informs whether he may seek immunity under Stetson's Stand Your Ground law.

State, you are hereby ordered to file a written Objection to the Motion to Dismiss on the two grounds stated.

All written motions and objections are due by September 1, 2024, at 5:00pm EDT. I am scheduling an evidentiary hearing to take place on this matter on October 3-6, 2024. As is common practice in Stand Your Ground cases, we will begin the evidentiary hearing with an opening statement to the court of the issues presented and the evidence expected to be elicited in support of each issue; followed by an evidentiary hearing in

which I will hear sworn testimony from witnesses; followed by oral argument based on the motions filed and the evidence elicited during the hearing.

Finally, I want to make abundantly clear who has the burden of proof at this hearing. Although the defense is moving to dismiss the charges on Stand Your Ground Immunity, I am confident their Motion will set forth a prima facie case to support their position on both issues. As such, consistent with the law in the State of Stetson, I am ordering that the prosecution bears the burden at the hearing of proving by clear and convincing evidence that the motion should be denied.

Does everyone understand my orders?

Attorney Zubrerre: Yes, Your Honor.

Attorney Milner: Yes, Your Honor.

Judge Prince: Good. So ordered. We are adjourned on this matter until October 3, 2024. Next case.

Stetson General Statutes



Penal Code

In effect in August 2022

782.04. Second Degree Murder. The unlawful killing of a human being, when perpetrated by any act imminently dangerous to another and evincing a depraved mind regardless of human life, although without any premeditated design to cause the death of any particular individual, is murder in the second degree and constitutes a felony of the first degree.

777.04. Criminal Attempt. A person who attempts to commit an offense prohibited by law and in such attempt does any act toward the commission of such offense, but fails in the perpetration or is intercepted or prevented in the execution thereof, commits the offense of criminal attempt.

790.01(2). Concealed Carry. 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. “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.”

776.012. Stand Your Ground. A person is justified in using or threatening to use deadly force if he or she reasonably believes that using or threatening to use such 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. 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.

776.032 Immunity from criminal prosecution and civil action for justifiable use or threatened use of force. A person who uses or threatens to use force as permitted in § 776.012 is justified in such conduct and is immune from criminal prosecution and civil action for the use or threatened use of such force by the person, personal representative, or heirs of the person against whom the force was used or threatened.

776.041. Use or Threatened Use of Force by Aggressor. The justification described in the preceding sections of this chapter is not available to a person who:

- (1) Is attempting to commit, committing, or escaping after the commission of, a forcible felony; or
- (2) Initially provokes the use or threatened use of force against himself or herself, unless:
 - (a) Such force or threat of force is so great that the person reasonably believes that he or she is in imminent danger of death or great bodily harm and that he or she has exhausted every reasonable means to escape such danger other than the use or threatened use of force which is likely to cause death or great bodily harm to the assailant; or
 - (b) In good faith, the person withdraws from physical contact with the assailant and indicates clearly to the assailant that he or she desires to withdraw and terminate the use or threatened use of force, but the assailant continues or resumes the use or threatened use of force.

3.190. Stetson Rule of Criminal Procedure – Pretrial Motions.

- (a) In General. Every pretrial motion and pleading in response to a motion shall be in writing and signed by the party making the motion or the attorney for the party.
- (b) Motion to Dismiss; Grounds. All defenses available to a defendant by plea, other than not guilty, shall be made only by motion to dismiss the indictment or information, whether the same shall relate to matters of form, substance, former acquittal, former jeopardy, or any other defense.
- (c) Time for Moving to Dismiss. Unless the court grants further time, the defendant shall move to dismiss the indictment or information either before or at arraignment. The court in its discretion may permit the defendant to plead and thereafter to file a motion to dismiss at a time to be set by the court. Except

for objections based on fundamental grounds, every ground for a motion to dismiss that is not presented by a motion to dismiss within the time provided herein, shall be considered waived. However, the court may at any time entertain a motion to dismiss on any of the following grounds:

....

(3) The defendant is charged with an offense for which the defendant previously has been granted immunity.

...

The facts on which the motion is based should be alleged specifically in the motion.