

IN THE CIRCUIT COURT OF THE
SEVENTH JUDICIAL CIRCUIT, IN
AND FOR FLAGLER COUNTY,
FLORIDA

CASE NO.: 2018-000675-CFFA

STATE OF FLORIDA,

Plaintiff,

vs.

ABDUL GANIYU JAMEL AYANWALE,

Defendant.

_____ /

MOTION TO SET BOND

COMES NOW Defendant, ABDUL GANIYU JAMEL AYANWALE, by and through the undersigned attorney, pursuant to Rule 3.130(d)(e), *Fla. R. Crim. Pr.*, and moves this Honorable Court to set a bond in this cause. In support thereof, Defendant would state as follows:

1. Defendant is charged in the above-styled cause with Grand Theft Motor Vehicle (Motor Vehicle), Grand Theft from a Dwelling, and a Domestic Battery by Strangulation. The current charges have no bond and there is an active warrant.

2. Attached is the alleged victim's statement of declination and stipulation to Defendant to getting a bond. Further, the alleged victim agrees to Defendant having bond. See "Exhibit A."

3. After speaking to the State Attorney, Mr. Michael Stover, has agreed to the bond amounts as follows for each counts against Defendant:

- (a) Grand Theft Motor Vehicle- \$10,000.00.
- (b) Grand Theft from a Dwelling- \$1,000.00.
- (c) Domestic Battery by Strangulation- \$1,000.00.

4. Defendant will seek gainful employment should a bond be set and he be released.

5. Defendant will reside in Central Florida if released and has numerous ties to the community.

WHEREFORE, Defendant, ABDUL GANIYU JAMEL AYANWALE, respectfully requests this Honorable Court to the above-referenced bond schedule above.

/s/ Jacob V. Stuart, Jr.
Jacob V. Stuart, Jr., Esquire
Florida Bar No.: 0086977

THE LAW OFFICE OF JACOB V. STUART, P.A.

/S/ Christopher R. Kaigle
Christopher R. Kaigle, Esquire
Florida Bar No.: 0085083
THE KAIGLE LAW FIRM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic filing to the Office of the State Attorney, 1769 East Moody Boulevard, #1-3, Bunnell, Florida 32110 and to the Honorable Terence Perkins, 1769 East Moody Boulevard, Bldg. #1, Bunnell, Florida 32110 on October 4, 2018.

/S/ Jacob V. Stuart, Jr.
Jacob V. Stuart, Jr., Esquire
Florida Bar No.: 0086977
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/S/ Christopher R. Kaigle
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Exhibit A

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT, IN AND FOR
FLAGLER COUNTY, FLORIDA

CASE NO.: 2018-00675-CFFA

STATE OF FLORIDA,

Plaintiff,

vs.

ABDUL GANIYU JAMEL AYANWALE,

Defendant.

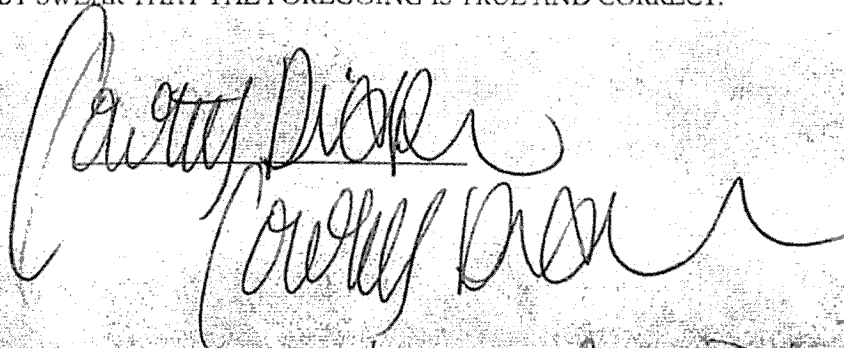
**AFFIDAVIT IN SUPPORT OF DECLINATION OF PROSECUTION AND
STIPULATION TO DEFENDANT HAVING BOND WITH NO CONTACT**

BEFORE ME, PERSONALLY APPEARED COURTNEY DICKSON, WHO WAS
SWORN AND SAYS THE FOLLOWING:

1. My name is COURTNEY DICKSON.
2. I am over the age of Eighteen. I was born on December 22, 1992.
3. I have personal knowledge of the facts set forth herein.
4. I have executed this Affidavit under no duress or coercion.
5. At the time I executed this statement, I was lucid and not under the influence of drugs, alcohol or medication to the extent that my ability to recall is impaired.
6. This Affidavit was prepared at my request and reflects my wishes in the above-styled cause.
7. The attorney of record, Jacob Stuart, Jr, Esquire advised me that he represents Abdul Ganiyu Jamel Ayanwale and does not represent me. Mr. Stuart also advised me that he and Mr. Michael Stover (the assistant state attorney state) have agreed that upon my stipulation as the alleged victim in this matter, Mr. Aywanale will have the following bond to the charges filed by the State in the above referenced matter: Count 1- \$10,000.00; Count 2- \$1,000.00; Count 3- \$1,000.00. As part of this stipulation, I will not have contact with Mr. Aywanale until this matter is resolved.
8. I am not afraid of, or in fear of, Abdul Ganiyu Jamel Ayanwale.

9. I would also like all charges dropped against Abdul Ganiyu Jamel Ayanwale and do not desire the State of Florida to prosecute him further for the incident that allegedly occurred in the above referenced matter.
10. By my signature on this Affidavit, I approve of all of the contents herein and swear that they are true and correct.
11. No one has forced me, coerced me, or promised me anything in order to entice me to make this Statement.
12. I have not been advised to withhold testimony, or withhold a record, document, or other object, from an official investigation or official proceeding.
13. I have not been advised to alter, destroy, mutilate, or conceal an object with intent to impair the integrity or availability of the object for use in an official investigation or official proceeding.
14. I have not been advised to evade legal process summoning a person to appear as a witness, or to produce a record, document, or other object, in an official investigation or an official proceeding.
15. I have not been advised to be absent from an official proceeding to which I have been summoned by legal process.
16. I have not been advised to hinder, delay, or prevent the communication to a law enforcement officer or Judge of information relating to the commission or possible commission of an offense or a violation of a condition of probation, parole, or release pending a judicial proceeding.
17. I have not been advised to testify untruthfully in an official investigation or an official proceeding.

I HEREBY SWEAR THAT THE FOREGOING IS TRUE AND CORRECT.



STATE OF FLORIDA
COUNTY OF FLAGLER

The foregoing was acknowledged before me on 10/03, 2018, by Courtney Dickson who has produced drivers license as identification.

Joanne Rountree
NOTARY PUBLIC



JOANNE ROUNTREE
NOTARY PUBLIC
STATE OF FLORIDA
Comm# FF196389
Expires 3/2/2019