

# 7th. Judicial Circuit 707 Charging Affidavit - Flagler

Arrest # \_\_\_\_\_

Bk # \_\_\_\_\_

Pg #1 of 4

ARREST <input type="checkbox"/> NOTICE TO APPEAR <input type="checkbox"/> AFFIDAVIT <input checked="" type="checkbox"/> C.C. <input type="checkbox"/>		ADULT <input checked="" type="checkbox"/> JUVENILE <input type="checkbox"/>		Court Case Number: <b>13-9040F</b>	
(ORI) FL: 0 1 8 0 0 0 0		Agency Name: <b>FLAGLER COUNTY</b>		Agency Case Number: <b>84027-13</b>	
FCIC/NCIC Check? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		OBTS#		UCR:	Date Arrested:
ADDRESS OF ARREST:		Arrested By:		ID Number:	
<b>DEFENDANT</b>		Name (L,F,M): <b>VERDONE JR, GIUSEPPE</b>		A.K.A.: <b>JOE</b>	
DOB: <b>10/01/91</b>		Age: <b>22</b>		Sex: <b>M</b>	
Driver's Lic/ID No.: <b>V635-280-91-361-0</b>		State: <b>FL</b>		Year Expires: <b>2021</b>	
Height: <b>5'10"</b>		Weight: <b>170</b>		S.S. #: <b>[REDACTED]</b>	
Hair: <b>BRO</b>		Eyes: <b>BRO</b>		POB (City, St, Country): <b>NEW YORK</b>	
Scars, Marks, Tattoos: <b>UNKNOWN</b>		Business & Occupation: <b>NONE</b>		Statement: Yes <input type="checkbox"/> No <input type="checkbox"/>	
Citizenship: Yes <input type="checkbox"/> No <input type="checkbox"/>		Probation: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Sexual Predator: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
English: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Deaf/Mute: Yes <input type="checkbox"/> No <input type="checkbox"/>		Address-Mailing/Permanent (STREET, APT. NUMBER) (CITY) (STATE) ZIPCODE RESIDENCE PHONE	
<b>64 BANNERWOOD LANE</b>		<b>PALM COAST</b>		<b>FL 32164 (386) 864-8558</b>	
Address-Local (STREET, APT. NUMBER) (CITY) (STATE) ZIPCODE RESIDENCE PHONE					
Address-Other(Employer/School) (STREET, APT. NUMBER) (CITY) (STATE) ZIPCODE BUS/SCHOOL PHONE					
<b>CHARGES</b>		DOMESTIC VIOLENCE? YES <input type="checkbox"/>		Attachments: Affidavit(s) <input type="checkbox"/> Statement(s) <input type="checkbox"/> NTA Schedule <input type="checkbox"/> Report <input type="checkbox"/> Traffic Infraction(s) <input type="checkbox"/> DUI <input type="checkbox"/> Total Charges: <b>5</b>	
#1	Charge: <b>CARJACKING</b>	FEL <input checked="" type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>		FS/ORD: <b>812.133</b>	
#2	Charge: <b>KIDNAPPING</b>	FEL <input checked="" type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>		FS/ORD: <b>787.01</b>	
#3	Charge: <b>FALSELY PERSONATING OFFICER</b>	FEL <input checked="" type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>		FS/ORD: <b>843.08</b>	
<b>CO-DEFENDANT</b>		Co-Def #1. Arrested? Y <input type="checkbox"/> N <input type="checkbox"/> Fel <input type="checkbox"/> Misd. <input type="checkbox"/> Traf. <input type="checkbox"/> Ord. <input type="checkbox"/> NTA <input type="checkbox"/>		Co-Def #2. Arrested? Y <input type="checkbox"/> N <input type="checkbox"/> Fel <input type="checkbox"/> Misd. <input type="checkbox"/> Traf. <input type="checkbox"/> Ord. <input type="checkbox"/> NTA <input type="checkbox"/>	
#1 NAME(L,F,M):	Race:		Sex:		DOB:
#2 NAME(L,F,M):	Race:		Sex:		DOB:
<b>NARRATIVE</b>					
<p>The undersigned certifies and swears that there is probable cause to believe the above named defendant, on the <u>2nd</u> day of <u>November</u>, 2013, at approximately <u>7:00</u> <input type="checkbox"/> a.m. <input checked="" type="checkbox"/> p.m. at <u>78 Bayside Drive</u> within <u>Flagler</u> County, violated the law and did then and there:</p> <p>On the night of November 2, 2013 I was the on call detective for the Investigative Service Division. At approximately 9:30 p.m. I was contacted in reference a possible carjacking/battery case that road patrol was in the process of working. I arrived at Florida Hospital Flagler and was updated by Deputy Parthemore about the details of the case. While getting updated information, the victim's sister in-law advised that she was leaving the hospital. I obtained a verbal statement from her as Ming Gong (victim) was unable to communicate due to his injuries and was in the process of being transported to Jacksonville (Shands Hospital) via helicopter. Shirin Chin Ling (sister in-law) advised that Ming Gong (victim) is the co-owner of King Palace located at 515 Palm Coast Pkwy. It is not uncommon for Ming to complete deliveries that were called into the restaurant. While Ming Gong (victim) was at FHF and still able to communicate, he told Shirin Chin Ling (sister in-law) about the events that took place. Ming stated that he was dispatched to 78 Bayside Drive, Palm Coast in order to deliver an order that was placed to the restaurant. Ming Gong arrived at 78 Bayside and began his approach to the residence. While making his approach to the front door he was met by a Hispanic or white male. This male posed as a law enforcement officer, showed an unknown police identification and asked Ming Gong for his insurance. This was as far as Shirin Chin Lings (sister in-law) conversation went with Chin due to medical staff having to provide care. Ming Gong and his family then left to be with Ming at Shands Hospital in Jacksonville. I spoke to a nurse on scene that explained Ming's injuries. Ming sustained a skull fracture which caused a hematoma and bleeding inside of the brain.</p>					
<b>NOTICE TO APPEAR</b>		MANDATORY APPEARANCE <input type="checkbox"/>		YOU NEED NOT APPEAR IN COURT BUT MUST COMPLY WITH INSTRUCTIONS ON THE REVERSE SIDE OF YOUR COPY <input type="checkbox"/>	
I AGREE TO APPEAR IN COURT HEREIN TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE INDICATED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED, OR PAY THE LISTED FINE, I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST WILL BE ISSUED.		FINE, AND COSTS AMOUNT:			
SIGNATURE OF DEFENDANT		DATE		RELATIONSHIP TO JUVENILE	
Sworn to and subscribed before me, the undersigned This 4th day of <u>November</u> , 2013.		I swear/affirm the above statements are correct and true.		Rt Thumb	
Name: <u>[Signature]</u>		OFFICER'S/COMPLAINANT'S SIGNATURE			
Notary Public <input checked="" type="checkbox"/> Law Enforcement or Corrections Officer <input checked="" type="checkbox"/> Personally Known <input type="checkbox"/> Produced Identification <input type="checkbox"/> Type of Identification:		NAME(PRINTED) <b>Det. Morales</b>		ID NUMBER <b>231</b>	
<b>OFFICIAL USE ONLY</b>		Inmate Number & facility:			

707 - COURT COPY



# Narrative 707-B Supplement

☐ Arrest  
☒ Affidavit  
☐ Notice to Appear

☐ Adult  
☐ Juvenile

Court Case  
Number:

Page # 2 of 4

Defendant Name: VERDONE JR, GIUSEPPE Agency Case Number: 84027-13

CHARGES		DOMESTIC VIOLENCE? YES <input type="checkbox"/>	Attachments: Affidavit(s) <input type="checkbox"/> Statement(s) <input type="checkbox"/> NTA Schedule <input type="checkbox"/> Report <input type="checkbox"/> Traffic Infraction(s) <input type="checkbox"/>		Total Charges: 5
# 4	Charge: AGGRAVATED BATTERY	FEL <input checked="" type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>	FS/ORD: 784.045	Citation No:	Bond:
# 5	Charge: INTERFERENCE WITH CUSTODY OF MINOR	FEL <input checked="" type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>	FS/ORD: 787.03	Citation No:	Bond:
#	Charge:	FEL <input type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>	FS/ORD:	Citation No:	Bond:

Ming also sustained numerous abrasions and road rash. These abrasions and road rash are consistent with being thrown from a moving vehicle. It was found that the Sheriff's Office call for service originated from firefighters that were stationed at Station 22 which is located at the corner of Palm Coast Pkwy (westbound) and Club House Drive. Firefighters reported to 911 that there was a male located at their station that was handcuffed behind his back and appeared to be in distress and injured. Deputies arrived on scene and found the victims shoe and ticket order on the side of Palm Coast Pkwy, West of the fire station. It is uncertain if the victim was pushed from the moving vehicle or the victim jumped from the moving vehicle. According to medical personnel, the victim's injuries are consistent with such an event. Due to the victim being handcuffed from behind there was no way for the victim to brace himself in any way resulting in the life-threatening injuries that were received. Deputies responded to 78 Bayside, found the victim's vehicle missing from the scene and also found that the residents of 78 Bayside were unaware of the incident. The residents advised that they did not place an order with the restaurant; it appears this incident was arranged and the suspect planned for a robbery to occur. The piece of paper (ticket order) that was recovered by law enforcement contained the address of 78 Bayside and telephone number (386)254-9288. This ticket was recovered lying next to Ming Gongs shoe. After receiving this information I continued this investigation by researching the above telephone number.

After researching telephone number (386) 254-9288 I arrived at [REDACTED] I spoke to [REDACTED] (juvenile) and his mother [REDACTED] and [REDACTED] were extremely cooperative and stated the telephone number belongs to [REDACTED]. In a recorded sworn interview with [REDACTED] he stated he let a male who he knows only as Joe to use his telephone at approximately 5:46 p.m. on this date, 11/02/13. [REDACTED] advised that he was with friends and was introduced to Joe by [REDACTED] (juvenile). [REDACTED] gave a good description of Joe's residence and I was able to drive by Joe's residence (64 Bannerwood Ln) with [REDACTED] and his older sister for a positive identification. [REDACTED] also advised that Joe was showing off metal handcuffs to him and [REDACTED] during the time they were together. [REDACTED] stated that Joe had the handcuffs placed in the small of his back with one cuff hanging over his pants. [REDACTED] gave a good description of Joe while Deputy Parthemore looked Joe up on an inner agency database. Deputy Parthemore pulled up Giuseppe Verdone Jr from the address provided and advised that he is familiar with Giuseppe who goes by the name of Joe. [REDACTED] looked at the picture that Deputy Parthemore provided on the computer and positively identified Giuseppe Verdone as being Joe and the same subject that used his phone and showed him handcuffs. I personally looked at [REDACTED] cell phone and took photographs of the phone number that Giuseppe called. While using [REDACTED] cell phone Giuseppe called telephone number (386) 597-2186. This telephone number belongs to King's Palace Chinese Restaurant. This is where the food order was placed and is believed to be the start of the preplanned robbery of Ming Gong (victim).

After my interview with [REDACTED] I arrived at [REDACTED] residence located at [REDACTED]. During a recorded interview with [REDACTED] stated that Giuseppe Verdone is her good friend's older brother. [REDACTED] also advised that she did witness Giuseppe use [REDACTED] telephone to make a phone call. [REDACTED] stated that he used the phone to call "some Chinese place" in an attempt to get a ride from the delivery driver in order to see a female by the name of [REDACTED]. [REDACTED] also stated Giuseppe has been in contact with [REDACTED]. [REDACTED] is a 15 year old missing juvenile. Giuseppe made comments to [REDACTED] that he was going to see [REDACTED] and help her. Giuseppe showed off a pair of handcuffs to [REDACTED].

Sworn to and subscribed before me, the undersigned this <u>7</u> day of <u>November</u> , 20 <u>13</u>	I swear/affirm the above statements are correct and true.	Right thumb
Name: <u>[Signature]</u>	<u>[Signature]</u> OFFICER'S/COMPLAINANT'S SIGNATURE	
Notary Public <input type="checkbox"/> Law-Enforcement Officer <input checked="" type="checkbox"/> Personally Known <input type="checkbox"/> Produced Identification <input type="checkbox"/>	NAME(PRINTED) <u>DET D Morales</u>	ID NUMBER <u>231</u>
Type of Identification:		



# Narrative 707-B Supplement

☐ Arrest  
☒ Affidavit  
☐ Notice to Appear

☒ Adult  
☐ Juvenile

Court Case  
Number:

Page # 3 of 4

Defendant Name: VERDONE JR, GIUSEPPE

Agency Case Number: 84027-13

CHARGES		DOMESTIC VIOLENCE? YES <input type="checkbox"/>	Attachments: Affidavit(s) <input type="checkbox"/> Statement(s) <input type="checkbox"/> NTA Schedule <input type="checkbox"/> Report <input type="checkbox"/> Traffic Infraction(s) <input type="checkbox"/>	Total Charges: 5
# 4	Charge: AGGRAVATED BATTERY	FEL <input checked="" type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>	FS/ORD: 784.045	Citation No: Bond:
# 5	Charge: INTERFERENCE WITH CUSTODY OF MINOR	FEL <input checked="" type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>	FS/ORD: 787.03	Citation No: Bond:
#	Charge:	FEL <input type="checkbox"/> MISD <input type="checkbox"/> ORD <input type="checkbox"/>	FS/ORD:	Citation No: Bond:

My next interview was conducted at Giuseppe Verdone's family's residence located at 64 Bannerwood Lane, Palm Coast. I spoke to Daniela (Giuseppe's mother), [REDACTED] (Giuseppe's brother), and [REDACTED] (Giuseppe's brother). During this interview all parties were extremely cooperative. Daniela, [REDACTED] all advised that Giuseppe does not own a vehicle and very rarely has money on him. Giuseppe arrived at his mother's home at approximately 10:00 P.M., 11/02/2013, driving a vehicle, which is uncommon. It should be noted 64 Bannerwood is approximately 200 yards from where the delivery location was set up from the Chinese Restaurant, 78 Bayside Drive. When Giuseppe arrived home he entered the home and retrieved a laptop computer and a gas container from the garage. Giuseppe also had cash which he showed to his brothers; they both advised it is uncommon for Giuseppe to have cash on him. The Verdone residence has video surveillance on the outside of the home. I witnessed this video surveillance and observed a vehicle pull up to the residence and observed Giuseppe exit the vehicle. At this time the vehicle is unable to be identified due to the quality of the footage. Giuseppe's younger brother stated he observed metal handcuffs on Giuseppe earlier in the day. [REDACTED] described these handcuffs as heavy metal with initials inscribed in them: this description matches the handcuff's that were removed from the victim. I then reviewed the laptop that Giuseppe used searching the history. I found that Giuseppe conducted research on a Motel 8 located in Virginia. I immediately placed a BOLO for the I-95 North Bound Corridor due to the possibility that the suspect was traveling in a northerly direction. Shortly after Giuseppe was arrested by the Mardeeville Police Department after a high speed chase took place. This pursuit started in Georgia and lasted approximately 45 minutes and ended in Mardeeville which is located in South Carolina. Giuseppe was in possession of the victim's vehicle which is a gray 4 door Toyota. Giuseppe had a female passenger with him that was identified as [REDACTED] missing juvenile from Palm Coast. Statements from Giuseppe revealed that Giuseppe knew of [REDACTED] age and of her missing status. At this time Ming Gong underwent surgery at Shands Hospital in Jacksonville and was placed in a medical induced coma.

Sworn to and subscribed before me, the undersigned this <u>4</u> day of <u>NOVEMBER</u> , 20 <u>13</u>	I swear/affirm the above statements are correct and true.	Right thumb
Name: <u>Det [Signature]</u>	OFFICER'S/COMPLAINANT'S SIGNATURE	
Notary Public <input type="checkbox"/> Law Enforcement Officer <input checked="" type="checkbox"/> Personally Known <input type="checkbox"/> Produced Identification <input type="checkbox"/>	NAME(PRINTED) <u>DET [Signature]</u> ID NUMBER <u>231</u>	
Type of Identification:		

707-B - COURT COPY



# Witness/Victim/Evidence Form 707-A

☐ Arrest  
☒ Affidavit  
☐ Notice to Appear

☒ Adult  
☐ Juvenile

Court Case  
Number:

Pg # 4 of 4

Defendant Name: VERDONE JR, GIUSEPPE		Agency Case Number: 84027-13	
Name (L,F,M): GONG, MING	Vic <input checked="" type="checkbox"/> Wit <input type="checkbox"/>	Race: ASIAN	Sex: M <input type="checkbox"/> F <input checked="" type="checkbox"/>
Address (#, Street, City, State): 135 PINE GROVE DRIVE, PALM COAST	Zip: 32164	Age: 43	DOB: 11/
Bus./School Address:	Home Phone: (646)591-7607	Statement: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Relative/Contact Name: SHIRIN CHIN LING	Relative/Contact Address: 8 CASTLE COURT, PALM COAST	Bus. Phone: (917)662-7930	
Name (L,F,M): CHIN LING, SHIRIN	Vic <input type="checkbox"/> Wit <input checked="" type="checkbox"/>	Race: ASAIN	Sex: M <input type="checkbox"/> F <input checked="" type="checkbox"/>
Address (#, Street, City, State): 8 CASTLE COURT, PALM COAST	Zip: 3217	Age: 35	DOB: 06/14/78
Bus./School Address:	Home Phone: (917)662-7930	Statement: Yes <input type="checkbox"/> No <input type="checkbox"/>	
Relative/Contact Name:	Relative/Contact Address:	Bus. Phone:	
Name (L,F,M): [REDACTED]	Vic <input type="checkbox"/> Wit <input checked="" type="checkbox"/>	Race: BLACK	Sex: M <input checked="" type="checkbox"/> F <input type="checkbox"/>
Address (#, Street, City, State): [REDACTED]	Zip: [REDACTED]	Age: 15	DOB: [REDACTED]
Bus./School Address:	Home Phone: [REDACTED]	Statement: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Relative/Contact Name: [REDACTED] (MOTHER)	Relative/Contact Address: [REDACTED]	Bus. Phone: [REDACTED]	
Name (L,F,M): [REDACTED]	Vic <input type="checkbox"/> Wit <input checked="" type="checkbox"/>	Race: HISP	Sex: M <input type="checkbox"/> F <input checked="" type="checkbox"/>
Address (#, Street, City, State): [REDACTED]	Zip: [REDACTED]	Age: 15	DOB: [REDACTED]
Bus./School Address:	Home Phone: [REDACTED]	Statement: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Relative/Contact Name: [REDACTED] (MOTHER)	Relative/Contact Address: [REDACTED]	Bus. Phone: [REDACTED]	
Name (L,F,M): [REDACTED]	Vic <input type="checkbox"/> Wit <input type="checkbox"/>	Race:	Sex: M <input type="checkbox"/> F <input type="checkbox"/>
Address (#, Street, City, State): [REDACTED]	Zip: [REDACTED]	Age:	DOB: [REDACTED]
Bus./School Address:	Home Phone: [REDACTED]	Statement: Yes <input type="checkbox"/> No <input type="checkbox"/>	
Relative/Contact Name:	Relative/Contact Address:	Bus. Phone: [REDACTED]	
Name (L,F,M): [REDACTED]	Vic <input type="checkbox"/> Wit <input type="checkbox"/>	Race:	Sex: M <input type="checkbox"/> F <input type="checkbox"/>
Address (#, Street, City, State): [REDACTED]	Zip: [REDACTED]	Age:	DOB: [REDACTED]
Bus./School Address:	Home Phone: [REDACTED]	Statement: Yes <input type="checkbox"/> No <input type="checkbox"/>	
Relative/Contact Name:	Relative/Contact Address:	Bus. Phone: [REDACTED]	

## EVIDENCE COLLECTED

Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount
Handcuffs, Victim Vehicle, Victims Clothing	11/2-3/13	n/a	
Owner(Name) Victim	(Address)	(Phone)	Value
Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount
Owner(Name)	(Address)	(Phone)	Value
Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount
Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount
Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount
Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount
Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount
Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount
Description of Evidence	Date Recovered	Model Serial/I.D. Number	Drug Amount

I certify that the foregoing is a complete list of witnesses/victims & evidence known to me.

*Det. D. Morales*  
Investigating Officer

231  
ID Number

*FCSD*  
Agency