

CLASSIFICATION: FELONY

STATE OF FLORIDA

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT, IN AND FOR FLAGLER COUNTY, FLORIDA, IN THE YEAR TWO THOUSAND NINETEEN

VS.

JOHN M WILLFORD  
W/M; DOB: 05/19/2000 SS#

CASE NO: 19-00368-CFFA  
AGENCY: FCSO/3829219

INFORMATION

CHARGE(S):

1) BATTERY ON A SCHOOL BOARD EMPLOYEE

R.J. LARIZZA, State Attorney for the Seventh Judicial Circuit of the State of Florida and as such prosecuting attorney for this Court, in the name of and by the authority of the State of Florida charges that:

COUNT I: JOHN M WILLFORD on or about April 24, 2019, in the County of FLAGLER and State of Florida, did actually and intentionally touch or strike ROBERT WILLIAM RHOADS and/or JAKE TYLER GAMBONE and/or MIKE P RINALDI against the will of ROBERT WILLIAM RHOADS and/or JAKE TYLER GAMBONE and/or MIKE P RINALDI or did intentionally cause bodily harm to ROBERT WILLIAM RHOADS and/or JAKE TYLER GAMBONE and/or MIKE P RINALDI 784.03(1) and at the time of said battery ROBERT WILLIAM RHOADS and/or JAKE TYLER GAMBONE and/or MIKE P RINALDI was an elected official or employee of the FLAGLER County School District and JOHN M WILLFORD knew or had reason to know the identity, position or employment of ROBERT WILLIAM RHOADS and/or JAKE TYLER GAMBONE and/or MIKE P RINALDI, contrary to Florida Statutes 784.081(2)(c). (3 DEG FEL)

FOR THE STATE ATTORNEY

*Jaime Telfer*

JAIME TELFER  
Bar No. 0497541  
ASSISTANT STATE ATTORNEY  
SEVENTH JUDICIAL CIRCUIT OF THE  
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COUNTY OF FLAGLER

STATE OF FLORIDA

Personally appeared before me JAIME TELFER, Assistant State Attorney, for the Seventh Judicial Circuit of the State of Florida, known to me to be the foregoing prosecuting officer, who being duly sworn, says that the allegations set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged. Subscribed in good faith. Said facts based on testimony of material witnesses.

SWORN to and subscribed before me this 2<sup>nd</sup> day of May, 2019.

Submitted to the Clerk of the CIRCUIT Court, Seventh Judicial Circuit, in and For FLAGLER County, Florida, on the 2<sup>nd</sup> day of May, 2019.

*Laure Dombek*  
NOTARY PUBLIC  
STATE OF FLORIDA  
LAURIE DOMBEK  
Commission #GG255661  
Expires November 9, 2022  
Bonded Thru Troy Fain Insurance 800-385-7019