

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

CASE NO: 19-00368-CFFA

STATE OF FLORIDA

VS.

**JOHN M WILLFORD,
DEFENDANT.**

Unofficial Document

MOTION TO MODIFY DEFENDANT'S PRE-TRIAL RELEASE CONDITIONS

Pursuant to the applicable Florida Rules of Criminal Procedure, the State of Florida, by and through the undersigned Assistant State Attorney, hereby moves this Honorable Court for the entry of an Order modifying the Defendant's pre-trial release conditions in this case, and as grounds therefore, would state as follows.

1. The Defendant is charged with Battery on a School Board Employee. On April 26, 2019, the Defendant attended First Appearance. At First Appearance, the Defendant was ordered to have no violent contact with Jake Gambone, Robert Rhoads, and Mike Rinaldi.
2. The Defendant is a student at Flagler Palm Coast High School. The victims are employees of Flagler Palm Coast High School. The offense occurred at Flagler Palm Coast High School.
3. On May 1, 2019, contact was made with the Mike Rinaldi, a victim in the above case. He stated that he and the additional victims are concerned regarding their safety if the Defendant is permitted contact. On May 2, 2019, contact was made with Robert Rhoads. He also fears for his safety and states that the Defendant's behavior has escalated to the point that he is getting aggressive with staff.
4. The Defendant has been a student at Flagler Palm Coast High School since January, 2019. According to Mr. Rinaldi, the Defendant's behavior has escalated since January. The Defendant has displayed verbally threatening behavior since January, however, it has now recently escalated to violent behavior.
5. On May 2, 2019, an Information was filed charging the Defendant with Battery on a School Board Employee.

6. The State has recently received the written sworn statements provided by the victims. The statements are attached to this motion.
7. The State has attached a proposed Order of No Contact.
8. Therefore, for the safety of all victims in this case, the State respectfully requests that this Court enter an Order modifying the Defendants pre-trial release conditions to include a no contact order with any and all victims in this case.

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R.J. LARIZZA
STATE ATTORNEY

By: s/JAIME TELFER
ASSISTANT STATE ATTORNEY
Florida Bar No.: 0497541
ESERVICEFLAGLER@SAO7.ORG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy hereof has been furnished by mail/delivery to REGINA NUNNALLY, ASSISTANT PUBLIC DEFENDER, on May 2, 2019.

s/JAIME TELFER

ASSISTANT STATE ATTORNEY

Florida Bar No.: 0497541

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