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

CASE NO: 18-01045-CFFA

STATE OF FLORIDA

VS.

PRINCESS NIOKA TROI WILLIAMS, DEFENDANT.

MOTION FOR PRETRIAL DETENTION

COMES NOW, the State of Florida, by and through the undersigned Assistant State Attorney, and moves this Court to issue an order holding the Defendant without bond in the above case numbers pursuant to Florida Statute § 907.041(4) and Florida Rule of Criminal Procedure 3.132(a). In support of this motion, the State would show the following:

- 1. On October 17, 2018, the Flagler County Sheriff's Office arrested the Defendant under the above-listed case number for Attempted Felony Murder, Attempted Robbery with a Firearm, and Burglary While Armed with a Firearm.
- 2. On October 16, 2018, the defendant did attempt to rob Carl Saint Felix of cannabis and U.S. Currency. The defendant arranged with as yet uncharged co-defendants to set up a drug deal and lure the victim to a location in Flagler County. When the victim arrived, two persons entered the backseat of the victim's car. The defendant walked up to the car within a few minutes, opened up the back door, entered the victim's vehicle, pointed a handgun at the victim and fired the gun. The bullet entered the victim's neck causing severe injury. As of the writing of this motion, the victim is still in critical condition. After shooting the victim, the defendant and the as of yet uncharged co-defendants fled the scene without calling anyone to help the victim.
- 3. The defendant was interviewed by detectives Nicole Quintieri and George Hristokopolous. During that interview, the defendant admitted to conspiring to rob the victim as well as being the individual who shot the victim.
- 4. Attempted Felony Murder and Attempted Robbery with a Firearm qualify as a "dangerous crime" under F. S. § 907.041(4)(a)(14).
- 5. There is a substantial probability based on the Defendant's behavior and the criteria in F.S. § 903.046 that the Defendant poses the threat of harm to the community as the

defendant is presently charged with a dangerous crime, there is a substantial probability that the defendant committed such crime, and that the factual circumstances of the crime indicate a disregard for the safety of the community. Further, there are no conditions of release reasonably sufficient to protect the community from the risk of physical harm to persons.

6. The undersigned has received testimony under oath supporting the grounds and essential facts alleged herein.

WHEREFORE, the State moves this Court to enter an order holding the Defendant in pretrial detention until its conclusion.

R.J. LARIZZA STATE ATTORNEY

By: <u>s/MELISSA L CLARK</u>

ASSISTANT STATE ATTORNEY

Florida Bar No.: 0499625

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy hereof has been furnished by mail/delivery to REGINA NUNNALLY, 1769 EAST MOODY BLVD BUILDING 1, KIM HAMMOND JUSTICE CENTER, BUNNELL, FL 32110-1448, on October 26, 2018.

s/MELISSA L CLARK

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