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19-7080  
No. \_\_\_\_\_

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SUPREME COURT, U.S.

IN THE

# Supreme Court of the United States

STANLEY JABOIN,  
*Petitioner*,

versus

SECRETARY, FLORIDA DEPARTMENT OF CORRECTIONS,  
MARK INCH, and  
ATTORNEY GENERAL OF FLORIDA,  
ASHLEY MOODY,  
*Respondent(s)*.

On Petition for Writ of Certiorari  
To The First District Court of Appeals  
For The State of Florida

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## PETITION FOR WRIT OF CERTIORARI

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12-15-19  
S.J.  
*St*

STANLEY JABOIN

Petitioner, *pro se*

DeSoto Correctional Institution Annex  
DC# B09697

13617 Southeast Highway 70  
Arcadia, Florida 34266-7800

## **QUESTIONS PRESENTED**

I. Petitioner ask did the First District Courts of Appeals apply federal law issued by the United States Supreme Court in a way that frustrates and undermines its holdings set forth IN RE *Winship*, 397 U.S. 358 (1970) and *United States v. Chandler*, 388 F.3d 796, 805 (11<sup>th</sup> Cir 2004), wherein the trial court(s) denied defence Motion for Judgment of acquittal as to failing to render aid and give information set forth in Fla. Stats. 316.193 (3)(c)3b?

## LIST OF PARTIES

A list of all parties to the proceeding in the court whose Judgment is the subject of this Petition is as follows:

1. Honorable Ashley Moody, Attorney General
2. Honorable James C. Hankinson, Circuit Court Judge, Second Judicial Circuit
3. Stanley Jaboin, Petitioner
4. Michael Ufferman, Appellate Attorney
5. Tabitha Rae Herrera , AAG
6. Mark Inch , SECRETARY , Fla . Department of corrections

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**Appendix B** Decision of State Courts of Appeals Denying Rehearing/Opinion