

## APPENDIX

1a

**APPENDIX A – OPINION OF THE THIRD  
DISTRICT COURT OF APPEALS (“3RD D.C.A.”),  
FILED SEPT. 18, 2024**

**IN THE DISTRICT COURT OF APPEAL  
OF FLORIDA THIRD DISTRICT**

3D2024-1359

Trial Court Case No. 21-CF-310-A-P

BRADLEY E. KING,  
*Appellant(s),*  
v.

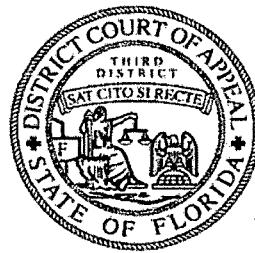
THE STATE OF FLORIDA,  
*Appellee(s).*

IT IS HEREBY ORDERED that Appellee's Motion to Dismiss Appeal for Lack of Jurisdiction is granted, and this appeal from the Circuit Court for the Sixteenth Judicial Circuit, Monroe County, Florida, is hereby dismissed for lack of jurisdiction.

EMAS, SCALES and GORDO, JJ., concur.

A True Copy  
ATTEST

/s/ *Mercedes Prieto*  
3D2024-1359 9/18/24]  
Mercedes M. Prieto, Clerk  
District Court of Appeal  
Third District



2a

*Appendix A*

CC: Crim Appeals MIA Attorney General  
Monroe Clerk  
Hon. Luis Garcia  
Ivy R. Ginsberg  
David George Hutchison  
Bradley E. King  
Robin King  
Sarah King  
NS

**APPENDIX B – OPINION OF THE FLORIDA  
SUPREME COURT, DATED OCTOBER 17, 2024**

**SUPREME COURT OF FLORIDA**

**SC2024-1479**

Lower Tribunal No(s).:  
3D2024-1359;  
442021CF000310000APK

**BRADLEY E. KING,**

*Petitioner(s)*

v.

**STATE OF FLORIDA,**

*Respondent(s)*

Petitioner's Notice to Invoke Discretionary Jurisdiction, seeking review of the order or opinion issued by the 3rd District Court of Appeal on September 18, 2024, is hereby dismissed. This Court lacks jurisdiction to review an unelaborated decision from a district court of appeal that is issued without opinion or explanation or that merely cites to an authority that is not a case pending review in, or reversed or quashed by, this Court. See *Wheeler v. State*, 296 So. 3d 895 (Fla. 2020); *Wells v. State*, 132 So. 3d 1110 (Fla. 2014); *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006); *Gandy v. State*, 846 So. 2d 1141 (Fla. 2003); *Stallworth v. Moore*, 827 So. 2d 974 (Fla. 2002);

*Appendix B*

*Harrison v. Hyster Co.*, 515 So. 2d 1279 (Fla. 1987);  
*Dodi Publ'g Co. v. Editorial Am. S.A.*, 385 So. 2d 1369  
(Fla. 1980); *Jenkins v. State*, 385 So. 2d 1356 (Fla.  
1980).

No motion for rehearing or reinstatement will  
be entertained by the Court.

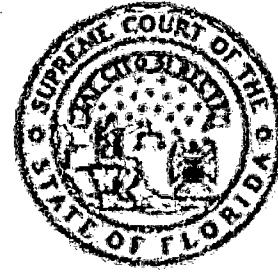
A True Copy

Test:

SC2024-1479 10/17/2024

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/s/ John A. Tomasino  
Clerk, Supreme Court



5a

*Appendix B*

**CASE NO.: SC2024-1479**

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TD

Served:

3DCA CLERK  
MIAMI-DADE CLERK  
MONROE CLERK  
HON. LUIS GARCIA  
IVY R. GINSBERG  
BRADLEY E. KING  
ROBIN KING  
SARAH KING

**APPENDIX C – ORDER DENYING MOTION TO  
COMPEL IN THE 16TH JUDICIAL CIRCUIT IN  
MONROE COUNTY, FILED JULY 8, 2024**

Filing # 202074543 E-Filed 07/08/2024 04:55:55 PM

IN THE CIRCUIT COURT OF THE 16th JUDICIAL  
CIRCUIT, IN AND FOR MONROE COUNTY,  
FLORIDA

CASE NO.: 2021-CF-310-AP

STATE OF FLORIDA,

Plaintiff,

And

BRADLEY KING,

Defendant.

**ORDER DENYING MOTION TO COMPEL**

**THIS CAUSE** came before the court upon the filing of Defendant's Motion to Compel. The court, having, reviewed the motion and being otherwise fully advised in the premises, it is therefore,

**ORDERED AND ADJUDGED** as follows:

1. The Defendant, Bradley King filed a Motion to Compel on June 17, 2024, with a closed case number 20CF59AP State of Florida vs. Juan Gonzalez. This motion contains the incorrect style and case number.

*Appendix C*

2. The Clerk of the Court filed this motion in closed case number 21CF310AP - State of Florida vs. Bradley King. This case was closed on January 10, 2023, and was transferred to County Court case number 23MM59AP.
3. County Court case number 23MM59AP - State of Florida vs. Brandley King was disposed of by the Court on November 2, 2023.
4. The Motion to Compel the Monroe County Clerk of the Court to delete Petitioner's name and affiliation with case number 20CF59AP - State of Florida vs. Juan Gonzalez is hereby DENIED. There is nothing in this case file to indicate that Defendant Bradley King is a party to this case.
5. The Motion to Compel Attorney#1, David Hutchison, to finish the second and third parts of the contractual agreement is hereby DENIED.
6. This order cancels the hearing currently scheduled for July 30, 2024, at 10:30 a.m. via Zoom.

**DONE AND ORDERED** in chambers in Monroe County, Plantation Key, Florida, this 8 day of July 2024.

/s/ Luis Garcia  
Luis M. Garcia, Circuit Judge

*Appendix C*

Ce:

Dennis Ward, SA, dward@keyssao.org

Trey Evans, ASA, tevans@keyssao.org

David Hutchison, Esq., info@floridakeyslegal.com;  
Karen@floridakeyslegal.com

Bradley King, myjehovah777@mail.com and 137 South  
Courtenay Parkway, Unit 626, Merritt  
Island, FL 32952

*Appendix C*

IN THE CIRCUIT COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT IN AND FOR MONROE  
COUNTY, STATE OF FLORIDA

UPPER KEYS CRIMINAL DIVISION

Case Number 2020CF00059AP

State of Florida

vs.

Juan C Gonzalez  
W/M, DOB: 06/07/1974

**INFORMATION FOR:**

- 1) Grand Theft (Motor Vehicle) 812.014 (2)(c)(6) (3 F)
- 2) Possession of Controlled Substance 893.13 (3 F)
- 3) Petit Theft 812.014(1) & (3)(a) (2 M)
- 4) Possession of Paraphernalia (Use) 893.147 1b (1 M)

*In the Name and by Authority of the State of Florida :*

Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in defendant(s), with the intent to permanently or temporarily deprive Jay D Moore or any other person not the defendant(s) of the property or benefit there from or to appropriate the property to the use of Juan C Gonzalez or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and the

*Appendix C*

said Judicial Circuit, under oath, information makes that Defendant, Juan C Gonzalez on or about March 14, 2020, in the County of Monroe and State of Florida, did knowingly obtain or use, or endeavour to obtain or use a motor vehicle which was the property of Jay D Moore, or any other person not the defendants with the intent to permanently or temporarily deprive Jay D Moore or any other person not the defendant(s) of the property or benefit there from or to appropriate the property to the use of Juan C Gonzalez or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c)(6).

COUNT 2: And the said Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, further information makes that Defendant, Juan C Gonzalez on or about March 14, 2020, in the County of Monroe and State of Florida, was unlawfully and knowingly in actual or constructive possession of Testosterone Cypionate, a substance classified under Florida Statute 893.03, commonly known as anabolic steroids, a controlled substance, contrary to Florida Statute 893.13.

COUNT 3: And the said Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, further information makes that Defendant, Juan C Gonzalez on or about March 14, 2020, in the County of Monroe and State of

*Appendix C*

Florida, did knowingly obtain or use, or endeavour to obtain or use a license plate of some vane, which was the property of Eliu Menendez Permuy, or any other person not the defendant(s), with the intent to permanently or temporarily deprive Eliu Menendez Permuy or any other person not the defendant(s) of the property or benefit there from or to appropriate the property to the use of Juan C Gonzalez or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (3)(a).

COUNT 4: And the said Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, further information es that Defendant, Juan C Gonzalez on or about March 14, 2020, in the County of Monroe and State of Florida, was unlawfully and knowingly in actual or constructive possession of syringes, which was drug paraphernalia being used, intended for use, or designed for use in injecting, ingesting, inhaling, of otherwise introducing into the human body a controlled substance, contrary to Florida Statute 893.147(1)(b).

The State hereby "NO ACTIONS" all remaining charges in this case.

*/s/ Luke Bovill*  
Luke Bovill

*Appendix C*

Assistant State Attorney  
Florida Bar No. 95527  
88820 Overseas Highway  
Tavernier, Florida 33070  
(305) 852-7170  
Lbovill@keyssao.org

STATE OF FLORIDA,  
COUNTY OF MONROE

Personally appeared before me, Luke Bovill, Assistant State Attorney for the Sixteenth Judicial Circuit of Florida who is personally known to me and whose signature appears above, and who being duly sworn, says that the allegations set forth in this Information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense(s) charged and further certifies that this prosecution is instituted in good faith and based upon testimony received under oath from the material witness or witnesses for the offense(s).

Sworn to and subscribed to before me this 20 day of March 2020.

/s/ JESSICA KILMURRAY  
NOTARY PUBLIC, State of Florida  
JESSICA MCNAMEE KILMURRAY  
Commission # GG 946516  
My Comm. Expires Jan 12, 2024  
Bonded through National Notary Assn.

*Appendix C*

IN THE COUNTY COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT IN AND FOR MONROE  
COUNTY, STATE OF FLORIDA

UPPER KEYS CRIMINAL DIVISION

Case Number: 23 mm59 AP

State of Florida

vs.

Bradley Eugene King  
W/M, DOB: 10/16/1962

AMENDED INFORMATION FOR:

- 1) Battery 784.03(l) (1 M)
- 2) Battery 784.03(1) (1 M)

In the Name and by Authority of the State of Florida:  
Dennis W. Ward, State Attorney for the Sixteenth  
Judicial Circuit, prosecuting for the State of Florida in  
the said Judicial Circuit, under oath, information  
makes that Defendant, Bradley Eugene King on or  
about November 30, 2021, in the County of Monroe and  
State of Florida, did then and there actually and  
intentionally touch or strike Adele Chico against her  
will, or did intentionally cause bodily harm thereto  
contrary to Florida Statute 784.03.

*Appendix C*

COUNT 3: And the said Dennis W, Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, further information makes that Defendant, Bradley Eugene King on or about November 30,202L, in the County of Monroe and State of Florida, did then and there actually and intentionally touch or strike Charla Chico against her will, or did intentionally cause bodily harm thereto, contrary to Florida Statute 784.03.

The State hereby "NO ACTIONS" all remaining charges in this case.

/s/ Trey Evans

Trey Evans  
Assistant State Attorney  
Florida Bar No. 1019996  
88770 Overseas Highway, Suite 3  
Tavernier, Florida 33070  
(305) 852-7170  
tevans@keyssao.org

STATE OF FLORIDA,  
COUNTY OF MONROE

Personally appeared before me, Trey Evans, Assistant State Attorney for the Sixteenth Judicial Circuit of Florida who is personally known to me and whose signature appears above, and who being duly sworn,

*Appendix C*

says that the allegations set forth in this Information are based upon facts, which if true, would constitute the offense(s) charged, and that this prosecution is instituted in good faith.

Sworn to and subscribed to before me this 9 day of January 2023.

*/s/ JESSICA KILMURRAY*  
NOTARY PUBLIC, State of Florida

JESSICA MCNAMEE KILMURRAY  
Commission # GG 946516  
My Comm. Expires Jan 12, 2024  
Bonded through National Notary Assn.

**APPENDIX D – ORDER OF HEARING  
CANCELLATION IN THE 16TH JUDICIAL CIR.,  
FILED MAY 7, 2024**

Filing # 197755832 E-Filed 05/07/2024 10:15:56 AM

IN THE CIRCUIT COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT,  
IN AND FOR MONROE COUNTY, FLORIDA

CASE NO.: 44-2021-CF-310-AP

STATE OF FLORIDA,

vs.

BRADLEY EUGENE KING,

Defendant.

**NOTICE OF CANCELLATION OF HEARING**

The hearing on the Motion to Compel currently scheduled for June 4, 2024, at 9:30 a.m. is hereby cancelled and removed from the docket. This case was transferred to Misdemeanor in January 2023; therefore, this Court no longer retains jurisdiction.

I HEREBY CERTIFY THAT a copy of this notice was mailed/mailed to all parties on the Tuesday, May 7, 2024

*Appendix D*

Bradley Eugene King myjehovah@keyssao.org	David George Hutchison info@floridakeyslegal.com karen@floridakeyslegal.com pleadings@floridakeyslegal.com
Trey Destin Evans tevans@keyssao.org ajones@keyssao.org jkiImurray@keyssao.org	

[44-2021-CF-000310-00-OAPK 05/07/2024 10:15:36 AM]



Wendy Dube, Judicial Assistant  
44-2021-CF-000310-00-OAPK 05/07/2024 10:15:36 AM

**APPENDIX E – ORDER OF 16TH JUDICIAL  
CIRCUIT COURT FOR IMMUNITY GRANTED  
OCTOBER 31, 2023 AND CERTIFIED, DEC. 15, 2023**

Filing # 185133135 E-Filed 10/31/2023 11:44:18 AM

IN THE COUNTY COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT IN AND FOR MONROE  
COUNTY, FLORIDA

Case No. 23-MM-59-AP

STATE OF FLORIDA,

Plaintiff

v.  
BRADLEY KING,

Defendant.

**ORDER GRANTING DEFENDANT'S MOTION TO  
DISMISS DECLARATION OF IMMUNITY**

This Cause came before the Court on the 10th day of October 2023, upon the Defendant's Motion for Declaration of Immunity and Dismissal pursuant to Florida Statute 5776.031. The Court, having heard argument and being otherwise fully informed in the premises, finds and orders as follows:

1. The Defendant seeks to have the charges dismissed based upon his statutory immunity pursuant to Fla. stat. s776.031.

*Appendix E*

2. The Defendant is charged with 2 counts of battery upon the alleged victims, which occurred on or about November 30, 2021.
3. The State has conceded the burden has shifted for purposes of the Stand Your Ground Motion.
4. Testimony was taken from Adele Chico, Charla Chico, Sarah King and the Defendant, Bradley King. A cell phone video on the day of the alleged incident was played in court and introduced as Defendant's #1. This video was taken by the alleged victim of Count 1 (Battery on Adele Chico).
5. The testimony of Charla Chico established her family company owns and rents real property located at 173 Iroquois Street, Tavernier, Florida. The Defendant and his family rented the subject property in Key Largo on an annual basis. At the beginning of the lease the Defendant and his family rented the downstairs portion of the home located in Key Largo. Prior to the incident in question the Defendant and his family moved to the upstairs portion of the house. Charla Chico, on behalf of the rental business, allowed the Defendant to move the curtains from the downstairs dwelling to the upstairs dwelling.
6. According to Charla Chico the Defendant was always complaining of something, he was late on payments and having trouble paying the rent. On November 29, 2021, Charla notified the renters of an inspection on November 30, 2021 by texting the

*Appendix E*

Defendant and posting a notice on the front downstairs door.

7. The video taken on November 30, 2021 shows Charla Chico, her husband Peter and their daughter Adele, being let into the home and coming up the stairs. Upon coming up the stairs there is immediate tension and yelling between Charla Chico and the Defendant. At one point Mrs. Chico instructs either her daughter or husband to take down the curtains. When they fail to react, Mrs. Chico begins taking down the curtains. Mr. King yells at Mrs. Chico to stop taking down the curtains and to leave his house immediately. Mr. King grabs Charla's phone and runs down the stairs in an attempt to have Charla follow him out of the home. It did not work.

9. Mr. King comes back into the house with the phone and proceeds to throw it out the window over the balcony. He testified he did this in an effort to have Charla Chico go and retrieve the phone, thus leaving the premises.

10. While Adele is filming the out of control situation, Mr. King yells at Adele to leave his home and pushes her with his body in an attempt to get her to leave the property.

11. Adele Chico testified that Mr. King tried to kill her mom and in response her mom stayed upstairs in the house and locked herself in the bathroom.

*Appendix E*

12. It is clear the Chico's came into the house to conduct a lawful inspection of the home in accordance with Chapter 83 Florida Statutes. However, Charla Chico admitted she was angry when she came into the tenant's home. Instead of merely inspecting the rental property, Mrs. Chico started to and completed removing the window curtains from the residence. Mrs. Chico originally gave the Kings' permission to have the curtains upstairs and then unilaterally withdrew the permission when she started removing the curtains.

13. It is also clear, based upon the testimony, that Mr. King was a difficult tenant. He had filed complaints about the Chicos with every agency he could think of, to wit: the Department of Business and Professional Regulations Division of Real Estate and The Florida Housing Authority.

**LAW**

14. The Defendant must make a *prima facia* claim of self-defense. The burden then shifts to the State to prove by clear and convincing evidence Defendant is not entitled to immunity based upon self-defense.

15. Here the State consented the Defendant had made a *prima facia* claim of self-defense and the burden shifted to the State.

16. The evidence presented by the State must be credible. Memories must be clear and without confusion. The sum total of the evidence must be of

*Appendix E*

sufficient weight to convince the trier of fact without hesitancy.

**CONCLUSIONS**

17. The State has failed to meet the shifted burden.
18. Here we have the alleged victims going into the Defendant's rental premises for a lawful inspection. However, the inspection turned into something more once the alleged victim (Charla), began pulling down the property of the Defendant (the curtains). Both Charla Chico and Adele Chico were asked to leave the rented home of the Defendant no less than 5 times.
19. There was clearly a confrontation involving screaming and yelling between the Defendant, and Charla and Adele Chico. The video shows Mrs. Chico taking the curtains down and Mr. King repeatedly asking Charla and Adele Chico to leave his home. Both Charla and Mr. King advised they were going to call the police.
20. When Mrs. Chico called the police, she can be heard on the 911 call advising the Defendant was beating her up, tried to push her down the stairs, was abusing her and her family and that he had a gun and had threatened to use it. The police understandably came to the home swiftly based upon the report.
21. The video played of the incident does not show any

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evidence of a felonious assault by the Defendant attempting to push Charla Chico down the stairs. This despite Mrs. Chico's continued description of the incident as a "felony snatching". The video does show the Defendant taking Charla's phone and ultimately throwing it over the railing outside. The alleged victims testified that the video does not depict the entire incident.

22. It is convenient that every single felonious action of the Defendant as alleged by Charla and Adele is not on the video of the incident. A video both witnesses testified was for the purpose of protection from the Defendant.

23. The law in question allows someone the use of reasonable force if the person is tortiously interfering with property that is lawfully in the Defendant's possession. That is exactly the facts we have herein. The Defendant possessed the curtains lawfully. Mrs. Chico was tortiously interfering with the Defendant's property.

24. The actions of the Defendant were entirely reasonable. An out of control landlord comes to the Defendant's home for an inspection and starts to remove personal property without proper authority. Both Charla and Adele were asked to leave more than once and instead of leaving continued to scream and yell and increase the hostile situation occurring in the rental home of their tenant.

*Appendix E*

25. The actions of the Defendant taking the phone and pushing both women in order to get them to stop tortuously interfering with his property was reasonable. The evidence presented causes great hesitancy and does not meet the burden of clear and convincing evidence.

**IT IS THEREFORE ORDERED AND ADJUDGED**

The Defendant's Motion to Dismiss based upon immunity is **GRANTED**.

**DONE AND ORDERED** in Plantation Key, Monroe County, Florida this Tuesday, October 31, 2023

44-2023-MM-000059-00-OAPK 10/31/2023 11:15:22 AM



Judge Sharon Hamilton, County Judge  
44-2023-MM-000059-00-OAPK 10/31/2023 11:15:22 AM

David G. Hutchison  
PIleadings@FloridaKeyslegal.com  
David George Hutchison  
info@floridakeyslegal.com  
karen@floridakeyslegal.com  
pleadings@floridakeyslegal.com  
Nick Gastesi; ngastesi@keyssao.org  
Trey Destin Evans; tevans@keyssao.org  
jkilmurray@keyssao.org; ajones@keyssao.org

**APPENDIX F – ORDER OF THE 16TH JUDICIAL  
CIRCUIT COURT FOR DISMISSAL OF  
RESTRAINING ORDERS, FILED MARCH 7, 2022**

Filed March 7, 2022, 12:14 PM

IN THE CIRCUIT COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT,  
IN AND FOR MONROE COUNTY, FLORIDA

Case No: 2021-DR-423-P  
Division: Plantation Key Family Court

CHARLA CAE CHICO,

*Petitioner,*  
And

BRADLEY EUGENE KING,

*Respondent,*

ORDER OF DISMISSAL OF TEMPORARY  
INJUNCTION FOR PROTECTION  
AGAINST ( ) DOMESTIC VIOLENCE (X) REPEAT  
VIOLENCE ( ) DATING VIOLENCE ( ) SEXUAL  
VIOLENCE ( ) STALKING

THIS CAUSE came before the Court on MARCH 7, 2022, upon Petitioner's action for an injunction for protection against: domestic violence; repeat, dating, or sexual violence; or stalking. Based upon the following circumstances, the Court dismisses the Petition:

*Appendix F*

- a.  Petitioner failed to appear at the hearing scheduled in this cause.
- b.  Petitioner appeared at the hearing but desires to voluntarily dismiss this action.
- c.  The evidence presented is insufficient under Florida Law (sections 741.30, 784.046, or 784.046, or 784.0485, Florida Statutes) to allow the Court to issue an injunction for protection against domestic, repeat

Accordingly, the case is dismissed without prejudice.

DONE AND ORDERED in PLANTATION KEY,  
Monroe County, Florida, on MARCH 7, 2022.

*/s/ Luis Garcia*  
LUIS M. GARCIA  
CIRCUIT JUDGE

\*\*\* THE RESPONDENT HAS A PENDING  
COLLATERAL CRIMINAL CASE # 21-CF-310-AP\*\*\*

Florida Supreme Court Approved Family Law Form  
12.980(e), Order of Dismissal of Temporary Injunction  
for Protection Against Domestic Violence, Repeat  
Violence, Dating Violence, Sexual Violence, or  
Stalking (03/15)

*Appendix F*

COPIES TO:

xxx Sheriff of Monroe County

Petitioner (or his or her attorney):

by U.S. Mail

by hand delivery in open court

by e-mail to designated e-mail address(es)

Respondent (or his or her attorney):

forwarded to sheriff for service

by hand delivery in open court

by e-mail to designated e-mail address(es)

xxx State's Attorney's Office

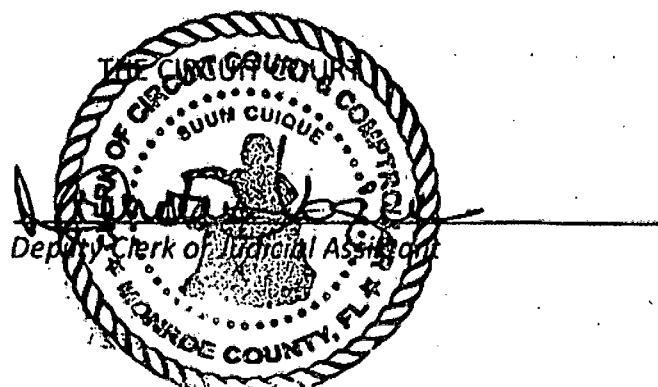
xxx Other: E. LOGAN / DVC

xxx Rayme Suarez, pet's atty

xxx David Hutchison, resp's atty

I CERTIFY the foregoing is a true copy of the original Order of Dismissal of Temporary Injunction as it appears on file in the office of the Clerk of the Circuit Court of Monroe County , Florida, and that I have furnished copies of this order as indicated above.

*Appendix F*



(SEAL)

Florida Supreme Court Approved Family Law Form  
12.980(e), Order of Dismissal of Temporary Injunction  
for Protection Against Domestic Violence, Repeat  
Violence, Dating Violence, Sexual Violence, or  
Stalking (03/15)

**APPENDIX G – NOTICE OF TRANSFER AND  
AMENDED INFORMATION OF ERROR IN  
MONROE COUNTY STATE ATTORNEY OFFICE,  
FILED JANUARY 9, 2023**

Filing # 164337523 E-Filed 01/09/2023 11:55:01 AM

IN THE CIRCUIT COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT  
IN AND FOR MONROE COUNTY, FLORIDA

UPPER KEYS CRIMINAL DIVISION

CASE No. 2021CF00310AP

STATE OF FLORIDA,

*Plaintiff*

vs.

BRADLEY EUGENE KING,

*Defendant,*

**NOTICE OF TRANSFER TO COUNTY COURT**

The State of Florida has filed an Information in this case charging an offense which is a misdemeanor. Therefore, the Clerk of Circuit Court is hereby directed to transfer the case to the Clerk of the County Court for further proceedings. The State of Florida further requests that this case be scheduled for the

*Appendix G*

next available arraignment docket before the County Judge that will be assigned to this case.

I do certify that a copy hereof has been furnished to David Hutchison Esq. by electronic mail on the 9th day of January 2023.

Respectfully submitted,

**Dennis W. Ward, State Attorney**  
88770 Overseas Highway  
Suite 3  
Tavernier, Florida 33070  
Tel. (305) 852-7170  
Fax.

By: /s/ Trey Evans  
Trey Evans  
Assistant State Attorney  
Florida Bar No. 1019996  
tevans@keyssao.org

*Appendix G*

IN THE COUNTY COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT IN AND FOR MONROE  
COUNTY, STATE OF FLORIDA

UPPER KEYS CRIMINAL DIVISION

Case Number 20CF 59 AP

State of Florida

vs.

Bradley Eugene King  
W/M, DOB: 10/16/1962

***AMENDED INFORMATION FOR:***

- 1) Battery 784.03(I) (1 M)
- 2) Battery 784.03(1) (1 M)

***In the Name and by Authority of the State of  
Florida:***

Dennis W. Ward, State Attorney for the Sixteenth  
Judicial Circuit, prosecuting for the State of Florida in  
the said Judicial Circuit, under oath, information  
makes that Defendant, Bradley Eugene King on or  
about November 30, 2021, in the County of Monroe  
and State of Florida, did then and there actually and  
intentionally touch or strike Adele Chico against her  
will, or did intentionally cause bodily harm thereto,  
contrary to Florida Statute 784.03.

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COUNT 3: And the said Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, further information makes that Defendant, Bradley Eugene King on or about November 30, 2021, in the County of Monroe and State of Florida, did then and there actually and intentionally touch or strike Charla Chico against her will, or did intentionally cause bodily harm thereto, contrary to Florida Statute 784.03.

The State hereby "NO ACTIONS" all remaining charges in this case.

/s/ Trey Evans

Trey Evans  
Assistant State Attorney  
Florida Bar No. 1019996  
88770 Overseas Highway,  
Suite 3  
Tavernier, Florida 33070  
(305) 852-7170  
tevans@keyssao.org

STATE OF FLORIDA,  
COUNTY OF MONROE

*Appendix G*

Personally appeared before me, Trey Evans, Assistant State Attorney for the Sixteenth Judicial Circuit of Florida who is personally known to me and whose signature appears above, and who being duly sworn, says that the allegations set forth in this Information are based upon facts, which if true, would constitute the offense(s) charged, and that this prosecution is instituted in good faith.

Sworn to and subscribed to before me this 9 day of January 2023.

/s/ JESSICA KILMURRAY  
NOTARY PUBLIC, State of Florida  
JESSICA MCNAMEE KILMURRAY  
Commission # GG 946516  
My Comm. Expires Jan 12, 2024  
Bonded through National Notary Assn.

APPENDIX H – CERTIFIED DISPOSITION (RED-STAMPED, ALTERED AND INITIALLED BY CLERK ON JAN. 29, 2024) AMENDED INFORMATION OF ERROR IN MONROE COUNTY STATE ATTORNEY OFFICE, DATED JAN. 9, 2023

IN THE COUNTY COURT OF THE SIXTEENTH JUDICIAL CIRCUIT IN AND FOR MONROE COUNTY, STATE OF FLORIDA

UPPER KEYS CRIMINAL DIVISION

23MM 59 AP

Case Number 20~~22~~59 AP

State of Florida

vs.

Bradley Eugene King  
W/M, DOB: 10/16/1962

**AMENDED INFORMATION FOR:**

- 1) Battery 784.03(I) (1 M)
- 2) Battery 784.03(1) (1 M)

*In the Name and by Authority of the State of Florida:*

*Appendix H*

Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, information makes that Defendant, Bradley Eugene King on or about November 30, 2021, in the County of Monroe and State of Florida, did then and there actually and intentionally touch or strike Adele Chico against her will, or did intentionally cause bodily harm thereto, contrary to Florida Statute 784.03.

COUNT 3: And the said Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, further information makes that Defendant, Bradley Eugene King on or about November 30, 2021, in the County of Monroe and State of Florida, did then and there actually and intentionally touch or strike Charla Chico against her will, or did intentionally cause bodily harm thereto, contrary to Florida Statute 784.03.

The State hereby "NO ACTIONS"  
all remaining charges in this case.

/s/ Trey Evans  
Trey Evans  
Assistant State Attorney  
Florida Bar No. 1019996  
88770 Overseas Highway, Suite 3  
Tavernier, Florida 33070  
(305) 852-7170  
tevans@keyssao.org

*Appendix H*

STATE OF FLORIDA,  
COUNTY OF MONROE

Personally appeared before me, Trey Evans, Assistant State Attorney for the Sixteenth Judicial Circuit of Florida who is personally known to me and whose signature appears above, and who being duly sworn, says that the allegations set forth in this Information are based upon facts, which if true, would constitute the offense(s) charged, and that this prosecution is instituted in good faith.

Sworn to and subscribed to before me this 9 day of January 2023.

/s/ JESSICA KILMURRAY

NOTARY PUBLIC, State of Florida  
JESSICA MCNAMEE KILMURRAY

Commission # GG 946516

My Comm. Expires Jan 12, 2024  
Bonded through National Notary Assn.

STATE OF FLORIDA  
COUNTY OF MONROE  
This copy is a True Copy of the  
Original on File in this Office. Witness  
My hand and Official Seal  
And that same is in full force and effect

This 09 day of Jan

A.D. 2023

LEVIN MADOLE CIRCUIT CLERK

Clerk Circuit Court

MONROE COUNTY

Deputy Clerk

**APPENDIX I – CHARGES INFORMATION BY  
STATE ATTORNEY DENNIS WARD, FILED  
DECEMBER 20, 2021**

FILED FOR RECORD DEC. 20, 2021, 2:21 PM

IN THE CIRCUIT COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT IN AND FOR MONROE  
COUNTY, STATE OF FLORIDA

UPPER KEYS CRIMINAL DIVISION

Case Number 2021CF00310AP

State of Florida

vs.

Bradley Eugene King  
W/M, DOB: 10/16/1962

***INFORMATION FOR:***

- 1) Robbery by Sudden Snatching 812.131(1) & (2b)  
(3 F)
- 2) Battery 784.03(1) (1 M)
- 3) Battery 784.03(1) (1 M)

***In the Name and by Authority of the State of Florida:***

Dennis W. Ward, State Attorney for the Sixteenth  
Judicial Circuit, prosecuting for the State of Florida in  
the said Judicial Circuit, under oath, information  
makes that Defendant, Bradley Eugene King on or

*Appendix I*

about November 30, 2021, in the County of Monroe and State of Florida, did knowingly take away a cellular phone, of some value, from the person or custody of Charla Cae Chico, with the intent to permanently or temporarily deprive Charla Cae Chico or any other person not the defendant of the property, when in the course of the taking, Charla Cae Chico was or became aware of the taking, contrary to Florida Statute 812.131(l)and(2b).

COUNT 2: And the said Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, further information makes that Defendant, Bradley Eugene King on or about November 30, 2021, in the County of Monroe and State of Florida, did then and there actually and intentionally touch or strike Adele Chico, against the will of Adele Chico, contrary to Florida Statute 784.03.

COUNT 3: And the said Dennis W. Ward, State Attorney for the Sixteenth Judicial Circuit, prosecuting for the State of Florida in the said Judicial Circuit, under oath, further information makes that Defendant, Bradley Eugene King on or about November 30, 2021, in the County of Monroe and State of Florida, did then and there actually and intentionally touch or strike Charla Cae Chico, against the will of Charla Cae Chico, contrary to Florida Statute 784.03.

*Appendix I*

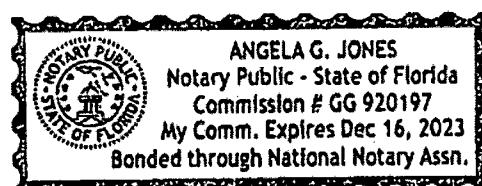
The State hereby "NO ACTIONS"  
all remaining charges in this case.

/s/ Joseph Mansfield  
Joseph Mansfield  
Assistant State Attorney  
Florida Bar No. 610631  
88820 Overseas Highway  
Tavernier, Florida 33070  
(305) 852-7170  
jmansfield@keyssao.org

STATE OF FLORIDA,  
COUNTY OF MONROE

Personally appeared before me, Joseph Mansfield, Assistant State Attorney for the Sixteenth Judicial Circuit of Florida who is personally known to me and whose signature appears above, and who being duly sworn, says that the allegations set forth in this Information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense(s) charged and further certifies that this prosecution is instituted in good faith and based upon testimony received under oath from the material witness or witnesses for the offense(s).

Sworn to and subscribed to before me this 20th day of December 2021.



/s/ Angela G. Jones  
NOTARY PUBLIC,  
State of Florida

**APPENDIX J – MOTION OF FLORIDA ATTORNEY  
GENERAL’S OFFICE IN THE 3RD D.C.A., FILED  
AUGUST 14, 2024**

Filing # 204685752 E-Filed 08/14/2024 11:06:36 AM

**IN THE DISTRICT COURT OF APPEAL  
OF FLORIDA, THIRD DISTRICT**

**CASE NO: 3D24-1359  
L.T. No. 21-CF-310-A-P**

**BRADLEY E. KING,**

**Appellant,**

**v.**

**THE STATE OF FLORIDA,**

**Appellee.**

---

**MOTION TO DISMISS APPEAL FOR LACK OF  
JURISDICTION**

Appellee, the State of Florida, by and through undersigned counsel, pursuant to Florida Rule of Appellate Procedure 9.300, hereby moves to dismiss this appeal based on the Court’s lack of jurisdiction and in support thereof states as follows.

*Appendix J*

1. The Notice of Appeal filed on July 29, 2024, is from an Order Denying a Motion to Compel rendered on July 8, 2024.
2. This is a pre-trial order which the Appellant is not authorized to appeal under Florida Rule of Appellate Procedure 9.140(b) or under section 924.06, Florida Statutes (2023). Section 924.06 provides that
  - (1)A defendant may appeal from:
    - (a)A final judgment of conviction when probation has not been granted under chapter 948, except as provided in subsection (3)
    - (b)An order granting probation under chapter 948;
    - (c)An order revoking probation under chapter 948;
    - (d)A sentence, on the ground that it is illegal; or
    - (e)A sentence imposed under s. 921.0024 of the Criminal Punishment Code which exceeds the statutory maximum penalty ...
  - (2)An appeal of an order granting probation shall proceed in the same manner and have the same effect as an appeal of a judgment of conviction. An appeal of an order revoking probation may review only proceedings after the order of probation. If a judgment of conviction preceded an order of

*Appendix J*

probation, the defendant may appeal from the order or the judgment or both.

(3)A defendant who pleads guilty with no express reservation of the right to appeal a legally dispositive issue, or a defendant who pleads nolo contendere with no express reservation of the right to appeal a legally dispositive issue, shall have no right to a direct appeal.

§ 924.06, Fla. Stat. (2023).

WHEREFORE, the State respectfully requests that this Court dismiss this appeal.

Respectfully submitted,

ASHLEY MOODY  
ATTORNEY GENERAL

/s/ Ivy R. Ginsberg  
IVY R. GINSBERG  
Assistant Attorney General  
Florida Bar No. 612316  
Office of the Attorney General  
One S.E. Third Avenue, Suite 900  
Miami, Florida 33131  
(305) 377-5441  
PRIMARY: CrimAppMia@myfloridalegal.com  
Secondary: Ivy.ginsberg@myfloridalegal.com

*Appendix J*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Notice of Appearance and Designation of E-mail Addresses was furnished by U.S. mail on August 13, 2024, to Bradley E. King, 137 South Courtnay Parkway Unit 626, Marritt Island, Florida 32952, myjehovah77@mail.com.

**CERTIFICATE OF COMPLIANCE**

I HEREBY CERTIFY that the foregoing motion was typed in Arial, 14-point font and is in compliance with the word count limits in accordance with Fla. R. App. P. 9.045(e).

*/s/ Ivy R. Ginsberg*  
IVY R. GINSBERG

APPENDIX K – NOTICE TO INVOKE  
DISCRETIONARY JURISDICTION OF THE  
FLORIDA SUPREME COURT, FILED OCT. 17, 2024

Filed October 17, 2024 11:58 AM

IN THE DISTRICT COURT OF APPEAL OF  
FLORIDA, THIRD DISTRICT

FL SUPREME Court No.: \_\_\_\_\_  
THIRD D.C.A. No.: 3D2024-1359  
L.T. No.: 2021CF310AP

BRADLEY E. KING, ROBIN  
KING and SARAH KING,

Petitioners,

v.

THE STATE OF FLORIDA,

Respondents.

---

NOTICE TO INVOKE DISCRETIONARY  
JURISDICTION OF SUPREME COURT

NOTICE IS GIVEN on this 17 day of October, 2024,  
that BRADLEY E. KING, ROBIN KING and SARAH  
KING, Petitioners, invoke the discretionary  
jurisdiction of the Supreme Court to hear, through  
oral argument, what the L.T. Court and the 3rd

*Appendix K*

D.C.A. Court chose not to hear, expressly the usage of Florida Statutes used by the State to indemnify another man's crimes while leaving the Petitioners without an option to pursue damages.

/s/ Bradley King      /s/ Robin King      /s/ Sarah King  
Bradley King, Pro-se      Robin King      Sarah King

Page 1 of 2

Petitioners reachable via e-mail:  
myjehovah777@mail.com; Additional mailing address:  
137 South Courtenay Parkway, Unit 626, Merritt  
Island, FL 32952.

**CERTIFICATE OF SERVICE**

Petitioners HEREBY CERTIFY that a copy of the foregoing Notice will be furnished by U.S. Mail /e-Mail, or in person on October 17, 2024 to:  
Third D.C.A.: 2001 S.W. 117th Ave., Miami, FL 33175.

Attorney General, Ashley Moody / Assistant Attorney General, Ivy Ginsberg  
One S.E. Third Avenue, Suite 900, Miami, Florida 33131  
PRIMARY: CrimAppMia@myfloridalegal.com  
Secondary: Ivy.ginsberg@myfloridalegal.com

*Appendix K*

The Circuit Court for the 16th Judicial Circuit,  
Monroe County:

Cc. Judicial Assistant, Wendy Dube.  
(wendy.dube@keyscourts.net )  
Cc. Riza Tabag. ( rtabag@monroe-clerk.com )

STATE OF FLORIDA:

Cc. State Attorney, Mr. Dennis Ward.  
( dward@keyssao.org )  
Cc. Assistant State Attorney, Mr. Trey Evans.  
( tevans@keyssao.org )

ATTORNEY:

Cc. Mr. David G. Hutchison, Esquire;RFA#24-9885.  
info@floridakeyslegal.com

*Appendix K*

IN THE DISTRICT COURT OF APPEAL  
OF FLORIDA THIRD DISTRICT

3D2024-1359

Trial Court Case No. 21-CF-310-A-P

BRADLEY E. KING,

*Appellant(s),*

v.

THE STATE OF FLORIDA,

*Appellee(s).*

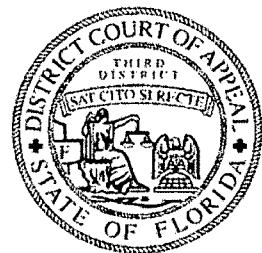
IT IS HEREBY ORDERED that Appellee's Motion to Dismiss Appeal for Lack of Jurisdiction is granted, and this appeal from the Circuit Court for the Sixteenth Judicial Circuit, Monroe County, Florida, is hereby dismissed for lack of jurisdiction.

EMAS, SCALES and GORDO, JJ., concur.

A True Copy

ATTEST

/s/ *Mercedes Prieto*  
3D2024-1359 9/18/24]  
Mercedes M. Prieto, Clerk  
District Court of Appeal  
Third District



*Appendix K*

CC: Crim Appeals MIA Attorney General  
Monroe Clerk  
Hon. Luis Garcia  
Ivy R. Ginsberg  
David George Hutchison  
Bradley E. King  
Robin King  
Sarah King  
NS

**APPENDIX L – NOTICE GIVEN NOV. 21, 2022 OF  
EVIDENTIARY HEARING SET FOR JAN. 9, 2023 IN  
THE 16TH JUDICIAL CIRCUIT**

Filing # 161675752 E-Filed 11/21/2022 04:46:03 PM

IN THE CIRCUIT COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT  
IN AND FOR MONROE COUNTY, FLORIDA

CRIMINAL DIVISION

Case No. 21-CF-000310-A-P

State of Florida  
Plaintiff

v.

Bradley King  
Defendant

**RE-NOTICE OF EVIDENTIARY HEARING**

PLEASE TAKE NOTICE that the evidentiary hearing on Defendant's Motion to Determine Immunity from Criminal Prosecution Under F.S. §776.031 has been re-scheduled and is to be held as follows:

Date: Monday, January 9, 2023  
Time: 1:30 p.m. to 3:30 p.m.

*Appendix L*

Location: **Plantation Key Courthouse  
88770 Overseas Highway  
Tavernier, Florida 33070**  
Judge: Honorable Luis M. Garcia

**The hearing previously set for Tuesday, November 29, 2022, at 1:30pm is CANCELLED.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided electronic mail on the 21st day of November 2022 to the Office of the State Attorney, 88820 Overseas Hwy., Tavernier, FL 33070.

Respectfully Submitted,  
*/s/ David G. Hutchison*  
David G. Hutchison, Esq.  
Fla. Bar No. 997420  
Hutchison& Tubiana, PLLC  
P.O. Box 371262  
Key Largo, FL 33037  
(305) 451-0013  
[info@floridakeyslegal.com](mailto:info@floridakeyslegal.com)

APPENDIX M – MOTION TO COMPEL (FIRST  
PAGE ALTERED) IN THE 16TH JUDICIAL CIR.,  
DATED JUNE 17, 2024

IN THE CIRCUIT COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT,  
IN AND FOR MONROE COUNTY, FLORIDA  
UPPER KEYS CRIMINAL DIVISION

Case No: 20-CF-59-A  
FILED FOR RECORD  
20 JUN 17 PM 3:16  
310A  
MONROE COUNTY, FLA.  
SLK CIR. CT.

STATE OF FLORIDA,

vs.

BRADLEY EUGENE KING  
W/M, DOB: 10/16/1962,

MOTION TO COMPEL

Comes now Pro-se Bradley E. King, as Petitioner and Robin King, and Sarah King herein known as "Petitioners". Since the mid 80's, Petitioners have held multiple licenses working directly with the Courts and the State. Petitioner was given a job opportunity by N.A.S.A.'s Engineering Division who agreed to a year's vacation before coming back home to an acre of land to build a house on and the last job that Petitioner would ever need. Petitioners chose an annually-leased, [...]

**APPENDIX N – UNALTERED MOTION TO  
COMPEL IN THE 16TH JUDICIAL CIR., FILED  
JUNE 17, 2024**

**IN THE CIRCUIT COURT OF THE SIXTEENTH  
JUDICIAL CIRCUIT,  
IN AND FOR MONROE COUNTY, FLORIDA**

**UPPER KEYS CRIMINAL DIVISION**

**Case No: 20-CF-59-AP**

**STATE OF FLORIDA,**

**vs.**

**BRADLEY EUGENE KING  
W/M, DOB: 10/16/1962,**

**MOTION TO COMPEL**

Comes now Pro-se Bradley E. King, as Petitioner and Robin King, and Sarah King herein known as "Petitioners". Since the mid 80's, Petitioners have held multiple licenses working directly with the Courts and the State. Petitioner was given a job opportunity by N.A.S.A.'s Engineering Division who agreed to a year's vacation before coming back home to an acre of land to build a house on and the last job that Petitioner would ever need. Petitioners chose an annually-leased, private residential home in an upscale neighborhood in Plantation Key, Florida, only to find out afterwards that the Landlord (a man well-known in the city and even more so in the Courts as Drug Runner, Pete

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A.K.A Pedro Chico, who lived next door to Petitioners) was about to start an illegal build-out of Petitioners' leased home. Petitioners showed reluctance more than once to allow "on-the-spot" entry without notice, remodeling of block walls, the removal of six-foot long jalousie windows and more within the home.

Petitioners, blowing the whistle by sending letters to the Housing Authority and to the D.B.P.R., found Landlords retaliated against said letters by subjecting Petitioners to hazing and harassment with false eviction letters, hate mail, robbery, and an unlawful arrest by a dirty Cop on November 30, 2021. The Petitioners were then left in the dark as the State Prosecutor (who found out, in or about November 2022, about the arresting officer's dismissal from the Police Force and the Petitioner's unlawful arrest) chose to further abuse Petitioners by adding two misdemeanors, and another man's felony that is found in the style and case number at the heading of this Motion. The fact that Petitioners were completely exonerated by the Courts, leaves this CF error, and the unlawful arrest on November 30, 2021, and other errors made by the State in question. Further grounds will state:

1. Petitioners, who all had spotless records when first moving to the Florida Keys, not knowing anybody, leased for a year a home in an upscale neighborhood in Plantation Key by a man known as Pedro Chico (aka Pedro Chico-Ortez) who offered a year's lease.

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2. This unfortunate, unknowing move by the Petitioners into Mr. Chico's annually-leased rental home was where Petitioner, (Father of the King family), was later unlawfully arrested and jailed on November 30, 2021.
3. Petitioner at that time was charged a single third-degree felony when arrested by a Monroe County Sheriff, Sergeant Nicholis Whiteman, who later was seen as doing a favor for the well-known, wealthy drug-runner, Mr. Chico.
4. Petitioners will address this matter with more detail below.
5. On or about December 1, 2021, the Petitioner announced to the Courts his Pro-Se status, so a bail was granted by the Honorable, Judge Sharon Hamilton.
6. On December 1, 2021, The Chicos sought after three permanent restraining orders; one for Mr. Chico and two other household members. (Case #2021-DR-423-P).
7. Petitioner handled the alleged charge by entering evidence in excess of a hundred pages (100) of facts and documents to facilitate the first Hearing concerning said restraining orders before Judge Hamilton. In that Hearing, the Chicos also requested that the Courts evict the Petitioners from said home;

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the request for eviction was denied (Zoom online hearing dated on or about December 14, 2021).

8. On December 23, 2021 (near Christmas Eve), while Petitioners were on a Christmas vacation, Mr. Chico left three (3) eviction notices on the front door of Petitioners. The Chicos had a Sheriff follow through with a quick eviction, and, in short, Petitioners were evicted. This left Petitioners homeless when returning from said vacation.

9. Petitioner arranged and attended multiple hearings before (Family court) Judge Hamilton, before the Case was passed on to the Honorable Judge Luis Garcia for the (CF) style case number of said arrest.

10. On or about January 4, 2022, the State Attorney set up an arraignment Hearing to be heard before Judge Garcia where the Petitioner submitted at that time his NOA to the Courts and developed his own plea of "Not Guilty" and asking for a trial by jury.

11. The Monroe County State Attorney, Dennis Ward, chose to add at that above-mentioned arraignment two (2) additional misdemeanors that the Petitioner was assured by the arresting officer that he would not be charged with. (case #2021-CF-00310-AP).

12. Petitioner scheduled a meeting after the arraignment and spoke for about an hour directly with the Assistant State Attorney, Joe Mansfield, in the

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attempt to convince him of the unlawful arrest and to drop all charges. (Hooray! It worked, but not until Sergeant Whiteman, the arresting Officer, was found out by an Internal Affairs Agent, Michelle Maxwell, and Sergeant Askins who was present at the time of the arrest, and who argued that it was the wrong thing to do, hence Sergeant Whiteman was dismissed from the Police Force in or about November of 2022.)

13. Petitioners will address the dismissal mentioned above with more detail below.

14. The Chicos, through false allegations, demanded that a hearing take place on March 7, 2022 before Judge Garcia to determine permanent restraining orders.

15. Petitioners hired on January 21, 2022, Attorney, David George Hutchison; FJA No.: 24-9885, herein known as "Attorney #1" to help in testifying in open court and to develop a strategy.

16. Petitioners filled in Attorney #1 on the work already done, and on the facts of the already-established case.

17. Attorney #1 agreed on a retainer of five-thousand dollars (\$5,000) and a three-part contractual and verbal agreement:

(First) dismissal of the Restraining Orders;

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(Second) dismissal of the Felony/Misdemeanor charges;

(Third) getting back what was stolen from the Petitioner's family through malicious prosecution with a 40\60 split.

18. The First part of the above-mentioned agreement (permanent restraining orders) handled by both Petitioners and Attorney #1 was heard, and as Attorney #1 put it, "it was a hands-down victory" dismissed quickly before Judge Luis Garcia on March 7, 2022. This was 'easy-Pickens' for Attorney #1's first of three parts he agreed to and was paid for.

19. On or about November 15, 2022, Sergeant Whiteman was given an ultimatum by Internal Affairs Director, Agent Michelle Maxwell, who stated to the Petitioners while meeting with her on November 27, 2023 at the Monroe County Sheriff's Department (Key West), "I informed Officer Whiteman to resign or else".

20. Petitioners were not made aware of Officer Whiteman's dismissal until November 21, 2023, when first informed by Captain Derek Paul, who is over Officer Whiteman's former district.

21. Petitioners will address Captain Derek Paul's statement with more detail below.

22. On January 9, 2023, the State Attorney, Dennis Ward, dropped the only charge the Petitioner was arrested and placed in jail for (a third-degree Felony

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charge) on November 30, 2021 by Officer Whiteman. This act should have ended this case for the obvious reasons.

23. The State Attorney charged on as Assistant State Attorney (Mr. Trey Evans), erred in his January 9, 2023 attempt to transfer said case to the lower Courts by improperly styling said case as # 20 - CF - 59 - AP, keeping it active and allowing another man's felony to be connected to the Petitioner. (Please see attached transfer).

24. Every so often, since January 9, 2023, and forward, Attorney #1 would comment to the Petitioners while meeting with them, "The State Attorney could reopen the felony case at any time, so you need us".

25. Petitioners believe the above-mentioned statement of needing Attorney#1 was a tool and a scare tactic to keep control of the Petitioners, not realizing until the November 21, 2023 discussion with Captain Paul that the above-mentioned tool had substance.

26. Petitioners will address this tactical approach by Attorney #1 with more detail below.

27. On January 9, 2023, Attorney #1 stated he first received the news of the State Attorney dropping the felony charge. This was just weeks after Officer Whiteman's dismissal.

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28. Attorney #1 called the Petitioners on January 9, 2023, at or about 10:30 a.m. informing them only of the felony being dropped, not why, nor that the arresting officer Sergeant Whiteman was dismissed from duty.

29. On January 9, 2023, while Attorney #1 spoke to the Petitioners, Attorney #1 demanded the right to clean-up what was left in the three-part contractual and verbal agreement.

30. The 'clean-up' that Attorney #1 was speaking of was:

A. The two misdemeanors the State applied at the January, 2022 arraignment Hearing and has chosen to continue in.

B. The agreed-upon litigation concerning Malicious Prosecution charges with a 40/60 split.

31. Attorney #1 simply did not want to give up the twelve-thousand seven-hundred dollar (\$12,700.00) cash money amount (plus Petitioners' professional court reporter services, which Petitioner paid for) given for Attorney #1's original three-part contractual agreement of his fees and services.

32. Petitioners met at Attorney #1's request in his office on about January 18, 2023 to sign a new contract relating to the felony drop made by State Attorney Dennis Ward, and said agreements in

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paragraph 29 with three thousand five hundred dollars (\$3,500.00) dollars as a retainer.

33. Attorney #1 then continued forward with said agreements.

34. Petitioners were reassured in that meeting by Attorney #1 who stated, "I will live up to the remainder of the second and third parts of our original agreement".

35. Attorney #1's reassurance of performance that day was not misread by any of the Petitioners who have signed their signatures at the bottom of this Motion to Compel.

36. Before Petitioners go any further, please allow a recap concerning the dismissal of the arresting Officer, Sergeant Nicholis Whiteman.

37. On or about November 15, 2022, marked the arresting officer, Sergeant Whiteman's, departure from the Police Force for what Petitioners and Monroe County Police Department are calling a wrongful arrest, 'derelict of duty' among other riotous acts and yet to be litigated.

38. In the beginning of said case, malicious prosecution by the arresting Officer Whiteman was the most crucial part of the above-mentioned case to confront, according to Agent Michelle Maxwell, an Internal Affairs official at the Monroe County

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Sheriff's Office (Key West), whom the Petitioners met with on or about November 27, 2023.

39. Agent Maxwell suggested in that above-mentioned meeting what Petitioners should have done at the beginning of said felony case by stating: "You should have come to me first about Sergeant Whiteman's wrongful arrest". Petitioner replied, "I first brought the history of this case to the presiding Judge Sharon Hamilton, later to the Assistant State Attorney, Joe Mansfield, and then again to Attorney #1."

40. Agent Maxwell replied, "And they never told you to come to me?" Petitioners answered, "No". This remark made by Agent Maxwell implied that all three, The Presiding Judge, Assistant State Attorney, and Attorney #1, should have referred Petitioners to come to Agent Maxwell.

41. The above-mentioned Agent Maxwell also stated to the Petitioners that she gave Sergeant Whiteman an ultimatum on or about November of 2022 "to resign or else".

42. Agent Michelle Maxwell also stated, at the end of the meeting on November 27, 2023, "if Sergeant Whiteman didn't resign, I would have fired him".

43. Petitioners also held a lengthy meeting on November 21, 2023 with the Monroe County Sheriff's Office Captain Derek Paul (several days prior of Agent

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Maxwell's comments), discussing the unlawful arrest by Sergeant Nicholis Whiteman and his dismissal from the Force in great detail with police camcorder video footage supplied by the State Attorney Mr. Trey Evans and Petitioner's demand for the prosecution of the Chicos (please see Complaint delivered to: Captain Paul; Agent Michelle Maxwell; State Attorney's office, Tom Walker; and Chief Sheriff, Rick Ramsey).

44. Captain Paul responded in the November 21, 2023 meeting, "about ninety-seven percent (97%) of the Officers in this County are clean; it is a shame concerning Whiteman and his dismissal".

45. The Internal Affairs Agent, Michelle Maxwell, did her job by hearing Sergeant Askins' rebuttal on video and investigating the November 30, 2021 arrest, and in the end, removing Sergeant Whiteman from the force.

46. Petitioners spent several hours with the heroes of this case like Captain Derek Paul, Internal affairs agent Michelle Maxwell, and of course Chief Ramsey, while attempting to provide reasons to peruse said complaint first given to Captain Deric Paul on November 21, 2023.

47. Petitioners spent about one hour on November 27, 2023 presenting this same above-mentioned Complaint to State Attorney, Tom Walker, in his Key West office pursuant to Agent Maxwell's request thirty (30) minutes earlier regarding "swearing out

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arrest warrants" concerning the prosecution of the Chicos.

48. Mr. Walker seemed to get nervous at the end of said meeting when Petitioners mentioned the name of the drug runner, Pedro Chico, and then insisted that he's not the one to prosecute the Chicos, review the complaint, or swear-out arrest warrants, and that Sheriff Ramsey would be the man to talk to.

49. Chief Ramsey stated to the Petitioner on November 29, 2023 while spending about one hour with him and Captain Derek Paul, "Mr. Walker lied to you. He is the one, and I don't know why he blew you off ." This conversation went on in the presence of Captain Derek Paul.

50. Paragraph 25 discusses Attorney #1. tactical approach Furthermore, Petitioner will state:

51. The above-mentioned information concerning Sergeant Whiteman's dismissal came in a host of ways that Attorney #1 would have been privy to, such as:

1. (Why) The State Attorney dropped said felony just weeks after Officer Whiteman's dismissal.
2. (Why) The State Attorney dropped said felony.
3. (Why) The State Attorney dropped said felony and not the misdemeanors.

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4. (Why) Attorney #1, who stated over the phone in January 2023 to Petitioners, "I am looking at the notice of transfer and the amended information for the two batteries that Assistant State Attorney, Trey Evans, sent to me and you guys need to meet with me later at the end of this month to discuss what's next". Yet, later that month, when meeting Attorney#1, nothing was said about the obvious wrong year and CF error of the Amended Information Document or the dismissal of Sergeant Whiteman.

52. The "Why" questions mentioned above are fair, and the Petitioners did ask Attorney #1 about the above-mentioned "Why" questions before and after said discussion with Agent Maxwell, and, each time, all accounts got a response from Attorney #1 of, "I don't know why".

53. The Assistant State Attorney, Mr. Evans', (CF) transfer error mentioned above is a huge problem in the eyes of the Marathon Key Clerk of Courts and the F.D.L.E. who both made the same statement, in December 2023 "either the CF case is expunged or the MM case (not both) can be expunged in a single lifetime". (Note : Petitioners are not asking the F.D.L.E. to clean up the State's mess.)

54. Despite the Arresting Officer being dismissed, Attorney #1 demanded in January 2023 that his role in Petitioners three-part contractual agreement was not finished and went after the second part of said contractual agreement (two misdemeanors within a

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CF eroded case) by arranging with the courts on May 10, 2023, a two and a half hour time slot for an Immunity Motion to be heard (for case # 23-MM-59-AP).

55. On May 10, 2023, said Immunity Motion was heard before Judge Hamilton, and Attorney #1 cut the above-mentioned hearing short, finishing in about thirty minutes.

56. The courts denied the Motion, due to a lack of evidence and testimony of the Petitioner's Daughter, Sarah King, who was present during the hearing, but Attorney #1 would not allow to take the stand.

57. Petitioner's Daughter, Sarah King, witnessed the November 30, 2021 incident and arrest first-hand.

58. Petitioners, amazed at the lack of effort in both involving the daughter, Sarah King, to take the stand and performance, stated exactly that to Attorney #1.

59. Attorney #1 apologized several days later in his office to the Petitioners and stated, "I went blank in the heat of the argument; I will set up another Hearing".

60. Petitioners realized after said Hearing that Attorney #1, a sharp individual, was dragging his feet in his duties to defend Petitioners in a timely manner.

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61. A new Hearing was set for June 8, 2023, where the Assistant State Attorney, Mr. Evans, debated technicalities of the case and demanded that Attorney #1 give more information than he did in the prior May 10th Hearing.

62. Attorney #1 asked and was granted a Continuance in said Hearing with a comment from the Judge of "keep Mr. King's case moving forward".

63. On or about July 6, 2023, Attorney #1 once again set aside a time slot for the above-mentioned Immunity Motion to be heard. This time, the State demanded that there was still a lack of details involved in the Motion provided by Attorney #1.

64. The courts gave yet more latitude to Attorney #1 by granting him another Continuance.

65. July 10, 2023, Attorney #1, e-mailed Petitioners to settle-up their account in full, a total of One-thousand four-hundred and fifty dollars (\$1,450.00).

66. Petitioners paid Attorney #1 said monies in full. Another Hearing was set for August 16, 2023, with both sides in attendance, and a newly detailed Immunity Motion was filed.

67. Attorney #1 did not fulfill, once again, all that was required by the State to understand what the Immunity Motion would detail.

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68. Attorney #1 and the Assistant State Attorney, Mr. Evans, both asked the Judge for yet another Continuance.

69. The Honorable Judge Sharon Hamilton gave both Attorney #1 and the Assistant State Attorney, Mr. Evans, what they both wanted.

70. Another Hearing was set to be heard on October 4, 2023.

71. Petitioners then respectfully had to demand that Attorney #1 have Sarah King (Petitioner's Daughter), who saw the November 30, 2021 incident take place first-hand, give to the Courts what the Courts stated in the May 10, 2023 Hearing was needed.

72. Sarah King's acute and accurate full testimony for the first time concerning the November 30, 2021 arrest was given on October 4, 2023.

73. This time, Attorney #1 did finish said Hearing on October 4, 2023 to the satisfaction of the courts.

74. The Courts issued an Order on October 31, 2023 granting Petitioners' Motion for Immunity and dismissing the misdemeanors that the State added on in the January 2023's amended information for Two misdemeanor battery's with case #20-CF-59-AP.

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75. As mentioned in paragraph 25, concerning the tool being used by Attorney #1 and the abuse of it, and what the State developed can be found in the CF error detailed at the heading of this motion.

76. The State Attorney did not challenge the above-mentioned court decision in the 30-day period allotted, sealing the deal on November 30, 2023 exactly two years after the said arrest. (Please see attached copy of the Order by the Honorable Sharon Hamilton granting petitioners motion for immunity).

77. You would think Attorney #1 would say "Hooray!" for the Petitioners; not so.

78. Attorney #1 seemingly continued to waffle to this day in his second agreed-upon responsibilities to finish handling the (CF) error made by Assistant State Attorney Trey Evans.

79. Attorney #1 simply has a three-part contractual agreement to uphold concerning case #'s:

1. Case #1 : 2021-DR-423-P (dismissed by Court order signed by Judge Garcia)
2. Case #2 : 2021-CF-00310-AP (To be heard by Judge Garcia, but dropped by the State)
3. Case #3 : 20-CF-59-AP (Assistant State Attorney's Mr. Evan's (CF) transfer error)
4. Case #4: 2023-MM-59-AP (Immunity Motion granted by Judge Hamilton)
5. Malicious Prosecution Case # (yet to start litigation)

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80. A Monroe County Clerk in Marathon Key, Florida commented and stamped (as certified dispositions) certain copies of the recent immunity hearing in December of 2023, but refused to stamp the CF error (amended information/transfer document). According to the Clerk, this was obviously a mistake and that Petitioners need to take the Assistant State Attorney's CF error to an Attorney so the Court can order the felony to be properly dropped otherwise the felony of the one known as Juan Gonzalez, will always be seen and connected to Petitioners name in the Clerk's data base.

81. The Clerk also stated, "The new number should have been #23-MM-59-AP".

82. Petitioners case in its entirety should have been dropped when the unlawful arrest and the dismissal of Sergeant Whiteman was made known to the State.

83. Agent Michelle Maxwell (the Attorney for the Monroe County Sheriff) also stated at the above-mentioned November 27, 2023 meeting concerning Sergeant Whiteman, "The malicious prosecution statute concerning the arresting officer involved in this case will come to an end in the very near future".

84. This overwhelming comment, given to the Petitioners, was brought to Attorney #1 at or about the end of November 2023.

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85. Attorney #1 disagreed with Agent Michelle Maxwell.

86. Attorney #1 is the Owner and founder of the firm known as Hutchison and Tubiana, located in Key Largo, Florida, with what he claims has practiced law for over thirty years.

87. Attorney #1 stated that he did the research on said comment made by the Internal Affairs leading Agent Maxwell; and he confidently stated, "Agent Michelle Maxwell is wrong", and that, "We have four years from the time of the 2022 arraignment to file a malicious prosecution case".

88. This comment was to assure the Petitioners of Attorney #1's involvement in the third part of said contractual agreement.

89. Attorney #1 continued to reaffirm to Petitioners that they should simply wait until the first of the year (2024) when holidays were over, and that at the beginning of the new year, Attorney #1 would follow through with said contractual agreement concerning Malicious Charges.

90. On or about January 2, 2024, Petitioners spoke with Attorney #1 on the phone, who once again reassured Petitioners of the direction concerning the third part of said agreement, and the malicious statutes, and that Petitioners should come back to his

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office on or about January 8, 2024 concerning said agreements.

91. On January 8, 2024, Petitioners came back as scheduled to Attorney #1's office and, spoke in further detail of the mishandling of the Assistant State Attorney (CF) error. Attorney #1 and his Wife (Karen) developed an e-mail at or about 6:00 pm asking the Assistant State Attorney to properly follow through with the January 9th 2023 dropping of said felony.

Attorney #1 then assured petitioners that he would fix it and he would get a simple 'agreed order' done from Mr. Evans, and to come back in a couple of weeks to sign on for the 40/60 final step of said agreement because he had yet to develop said contract.

92. On January 23, 2024, Petitioners were told by Attorney#1, who Petitioners now believe was stalling for unknown reasons, to come back five times after the January 23, 2024 meeting.

Once on February 15, 2025  
Once on February 16, 2025  
Once on February 19, 2025  
Once on February 20, 2025  
Once on February 21, 2025

93. On February 21, 2024, as well as all the above-mentioned February dates, Petitioners all came respectfully and patiently back, to Attorney #1's office to sign said litigation contract and were told by Attorney #1 in the beginning of this meeting, "I can't

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help you anymore" and that Petitioners should seek after another Attorney, preferably a firm known as 'Rubenstein', or the firm 'Morgan and Morgan'.

94. Petitioners reminded Attorney #1 of his contractual agreements that he was paid for.

95. Attorney #1's response, once again, was, "I can't help you" unless you would like to pay me both ways, for attorneys fees and a 40/60 split.

96. Attorney #1 at that time went against said three-step agreement that he originally demanded that Petitioners keep as mentioned in paragraph 29.

97. Petitioner informed Attorney #1, "I'll be taking this to the Bar". Attorney #1's response was "Go ahead".

98. Attorney #1 simply stated at the end of the February 21, 2024 short meeting, "I know what our agreements are; I can't help you unless you pay both ways".

99. Such actions were initiated by a well-known drug runner, a dirty Cop then by an assistant State Attorney's error, and most horribly by Attorney #1, who has failed to disclose information concerning Sergeant Whiteman, and his dismissal this much Petitioners believe Attorney #1 would of been privy to.

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100. Attorney #1 also refusing to finish said (CF) case errors or initiate the third step of his contractual agreed-upon litigations that he was paid in full for.

In conclusion, "Too many supposed defense lawyers do not care to rock the boat so as to garner the wrath of the prosecutors with whom they work regularly." In a 2007 case, Justin Hopson vs. New Jersey State Police, is found to be a match to the occurrence of abuse and retaliation that the Petitioners suffered in this case and the actions of a lordship of those who think they are going to keep someone 'in line' or in the dark despite the rules of engagement designed to protect the public. The Law Bar, prompted by Attorney #1, replied as well in stating: "The Supreme Court of Florida has ruled that the disciplinary process and proceedings are not to be used as a substitute for civil proceedings and remedies. *See The Florida Bar v. Della Donna*, 583 So. 2d 307 (Fla. 1989)." This makes it clear that a ruling concerning neglect or malicious behavior from the above-mentioned Attorneys would first come from the lower Courts and any further actions would take place afterwards. Furthermore, Petitioners understand that this Honorable Court would know if the malicious prosecution of a victim of an unlawful arrest ( that was acquitted and fully exonerated ) would be subject to a statute where police cam-cording and testimony would run out in a four year period of time as described by Attorney #1 or not, and if the Assistant State Attorney's (CF) error, left unattended, would leave the Clerk of the Courts and the F.D.L.E. without

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remedy. Criminal case # 20-CF-59-AP, which is completely unaffiliated with Petitioners unlawful arrest, would impair Petitioners' ability to apply to N.A.S.A. for employment. Petitioners Pray for the Courts to show mercy on the acquittal of the Petitioner who was completely exonerated by both the Criminal and Family Courts regardless of the State, who should have known of Sergeant Whitman's dismissal, but rather carried on their suit in 2023 by an erred CF case number that Attorney #1 stated he never saw. Thus, abusing Petitioners for two full years before the Heroes of this case, who were found in the Monroe County Police Department, saw the unlawful Felony arrest by Sergeant Whiteman and dismissed him from his duties as an officer. Petitioners pray this Honorable Court consider signing two Orders:

First to direct the Monroe County Clerk to delete Petitioners name and affiliation with one, Juan Gonzalez, Case # 20-CF-59-AP, noted at the heading of this complaint, and any misdemeanor charge due to the November 30, 2021 unlawful arrest of which the Petitioner was acquitted for.

Secondly, an Order to Compel Attorney #1 to finish the second and third parts of the above-mentioned contractual agreements that he was paid for in full; this coupled with what the Courts see to be appropriate and just before men and God.

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Dated: 6-17-2024

Bradley King Pro-se

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Dated: 6-17-2024

Robin King

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Dated: 6-17-2024

Sarah King

Petitioners reachable via e-mail:

**myjehovah777@mail.com**

Additional mailing address: 137 South Courtenay Parkway, Unit 626, Merritt Island, FL 32952

I HEREBY CERTIFY THAT a copy of this notice was mailed/mailed to all parties on the Monday, June 17, 2024.

Cc. State Attorney Mr. Dennis Ward. (e - mailed to: [dward@keyssao.org](mailto:dward@keyssao.org) )

Cc. Assistant State Attorney Mr. Trey Evans.  
(e - mailed to: [tevans@keyssao.org](mailto:tevans@keyssao.org) )

Cc. Mr. David George Hutchison, esquire; RFA No.: 24-9885. ( e - mailed to: [info@floridakeyslegal.com](mailto:info@floridakeyslegal.com) )  
[Karen@floridakeyslegal.com](mailto:Karen@floridakeyslegal.com)

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**Short List of Relevant State and Court Actions and Attachments below (more available upon request):**

Hearing in attendance dated on, December 14, 2021  
Case # 2021 - DR - 423 - P ( Restraining Orders )  
(Zoom online with Judge Hamilton)

Link:

<https://zoom.us/j/91279405272?pwd=NWZDaDlkZzZsZ0F6WExRRXFDOExtUT09>

State Attorney Filed Notice adding - on 2 batteries on  
December 20, 2021, ( Felony / Misdemeanors )  
Case # 2021 - CF - 00310 - AP

Eviction Notice ("Summons"), December 23, 2021  
Case # 21 - CC - 159 - P

(Judge Garcia was appointed restraining orders' case  
after January 1, 2022)

Arraignment Hearing of said case, January 4, 2022,  
Case # 2021 - CF - 00310 - AP

Court's Final Judgment for Eviction dated,  
January 7, 2022, Case # 21 - CC - 159 - P

Hearing in attendance dated March 7, 2022  
Case # 2021 - DR - 423 - P

Court Order Response dated March 7, 2022  
Case # 2021 - DR - 423 - P

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Hearing dated January 9, 2023  
Case # 2021 · CF · 00310 – AP

State Attorney's Transfer dated January 9, 2023  
2021 · CF · 00310 – AP

Assistant State Attorney's (CF) error January 9, 2023  
Case # 20 · CF · 59 · AP (active)

Hearing in attendance dated May 10, 2023  
Case # 23 · MM · 59 – AP

Court Order Response dated June 20, 2023  
Case # 23 · MM · 59 – AP

Hearing in attendance dated June 8, 2023  
Case # 23 · MM · 59 – AP

Court Order for continuance date July 6, 2023  
Case # 23 · MM · 59 – AP

Hearing in attendance dated July 6, 2023  
Case # 23 · MM · 59 – AP

Court Order for continuance date August 3, 2023  
Case # 23 · MM · 59 – AP

Hearing in attendance dated August 16, 2023  
Case # 23 · MM · 59 – AP

Court Order for continuance date September 7, 2023  
Case # 23 · MM · 59 – AP

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Hearing in attendance dated October 4, 2023  
Case # 23 - MM - 59 - AP

Court Order Granting Dismissal October 31, 2023  
Case # 23 - MM - 59 - AP

Court Minutes noting: November 2, 2023

In regards of two batteries, "Crt Dismissed per crt  
order"

Above-mentioned Court Order Finalized November 30,  
2023, Case # 23 - MM - 59 - AP