### Filing # 204815832 E-Filed 08/15/2024 02:51:04 PM

## IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT IN AND FOR ALACHUA COUNTY, FLORIDA

State of Florida Plaintiff. Case Number: 01-2024-CF-002671-A

Division II

VS.

Rodney Lee Gillis Defendant.

#### MOTION FOR PRETRIAL DETENTION

COMES NOW the State of Florida, by and through the undersigned Assistant State Attorney, and moves this honorable court to enter an Order detaining the Defendant in custody pending a final hearing on Pretrial Detention, and sets forth with particularly the grounds and essential facts, as follows:

- 1. The Defendant has been arrested for an offense for which detention may be ordered under §907.041, Fla. Stat., to wit: Sexual Battery
- 2. The State will show that there is a substantial probability that the defendant poses the threat of harm to the community. The defendant is presently charged with a dangerous crime, there is a substantial probability that the defendant committed such crime, the factual circumstances of the crime indicate a disregard for the safety of the community, and there are no conditions of release reasonably sufficient to protect the community from the risk of physical harm to persons.
- 3. The Defendant did commit sexual battery upon person who is

penetrating The Victim told the Defendant multiple times to stop

- a. The events occurred in a tent at Grace Marketplace where the victim was brought five days prior to the incident.
- b. The victim was staying with her aunt who others at Grace Marketplace indicated was "selling" sex with the victim in exchange for drugs.
- c. The Defendant admitted to having sex with the Victim but, stated it was consensual.
- d. See Exhibit A, the mittimus of Ofc. Figueredo GPD which is incorporated and relied upon for this motion.

WHEREFORE, the State respectfully moves this honorable court to find that there is probable cause to believe that the Defendant committed the offense, and that the Defendant should be detained in custody pending a final hearing on Pretrial Detention.

STATE OF FLORIDA COUNTY OF ALACHUA

Personally appeared before me the undersigned Pamela K. Brockway, Assistant State Attorney, Eighth Judicial Circuit of Florida, who, being first duly sworn, certifies that he/she has received

testimony under oath supporting the grounds and the essential facts alleged in this motion.

Brian S. Kramer

State Attorney

Pamela K. Brockway Assistant State Attorney Florida Bar No.: 0888664 120 West University Ave Gainesville, FL 32601 (352) 374-3670

E-service: eservice@sao8.org E-mail: brockwayp@sao8.org

The foregoing instrument was acknowledged before me this 14th day of August, 2024. by Pamela K. Brockway, Assistant State Attorney, who is personally known to me and who did take an oath.

**CERTIFICATE OF SERVICE** 



I HEREBY CERTIFY that a true copy of the foregoing has been furnished to Linda E. Haddad, Attorney for the Defendant, by email, this 15th day of August, 2024.

#### s/ Pamela K. Brockway

Pamela K. Brockway Assistant State Attorney Florida Bar No.: 0888664 120 West University Ave Gainesville, FL 32601 (352) 374-3670

E-service: eservice@sao8.org E-mail: brockwayp@sao8.org

# **EXHIBIT** A

Marina de	ARREST SWORN COMPLAINT HOLD	EIGHTH JUDICIAL CIRCUIT	☐ JUVENILE ☐ NOTICE TO APPEAR						
	0108060417		AGENCY CASE REPORT NUMBER: 02-24-011667						
	NAME OF SUBJECT (LAST, FIRST, MI): GILLIS, RODNEY LEE	ALIAS / MAIDEN	02-27-01100/						
e de la companya de l	911 HOME ADDRESS (STREET, APARTMENT MUMBER, ETC.):	GITY: STATE	TE: ZP CODE, TELEPHONE NUMBER:						
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			TELEPHONE NUMBER:						
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	3055 NE 28TH DR	08/11/2024 14:28	8 08/11/2024 Francis						
	SUBJECT IDENTIFIED BY WHOM (VICTIM, WITNESS, LEO, ETC.): VICTIM 1	SUBJECT'S NAME VERIFIED BY (PHOTO)	ID, FAMILY MEMBER, KNOWN TO OFFICER, ETC.):						
l c	21 /NAME	DAVID PHOTO  DATE OF BIRTH: RACE: SEX: COURT NUMBER:	ARRESTED FELONY JUVENILE						
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ý	☐ ISSUED NTA AND RELEASED	Confidential and Pro-							
	PARENT / GUARDIAN HOME ADDRESS (STREET, APARTMENT & PO BOX.	.erc.):   Crime Victim Informestati	E 7 ZIP COBE: HOME TELEPHONE NUMBER:						
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ħ	#2 (NAME):	3055 NE 28TH DR. GAINESVILLE FL 32609							
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CH	OFFENSE DESCRIPTION SEXUAL BATTERY		ORDINANCE NUMBER: VICTM NOTIFICATION: ARREST: □ YES □ NO						
AR	☐ WARRANT ☐ JUVENILE PU ORDER ☐ CIVAL ORDER ☐ CITA	☐ TRAFFIC ☐ NTA 794-011	RELEASE: ₩YES 🗍 NO						
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į.	NUMBER: VICTIM (NAME):	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): CITY:	STATE ZIP CODE:						
2	THE FOLLOWING INCIDENT OCCURRED AT (ADDRESS / LOCATION).								
0.00 U.O.U	3055 NE 28TH DR	COUNTY OF: STATE OF:  ALACHIA FLORIDA							
8	On the above date, location, a	AND	ALACHUA FLORIDA act with the VIC, who made						
Ü	the following account:								
Ý	Approximately 2-3 days prior	she was sexually battered in the	tant cha maida in the						
S	Grace. The VIC confirmed that	she is an adult, but said she is	. The VIC stays						
M	at Grace with her great aunt	e said has been exploiting							
Ŕ	the VIC and selling sex with he third-party information and he	her in exchange for drugs. The VI ad not been directly confirmed wi	IC advised that this was						
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1 0	aunt (IO). The VIC grandfather dropped her off at Grace approx. 5 days prior and she had												
R		been residing in her tent since then. On the day of the sexual battery, the VIC and her											
S	111	aunt were approached by a B/M subject she knew only as "Rod" (DEF). The VIC went into her tent with the DEF and thought they were going to talk, but instead the DEF pushed											
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M	but the DEF ignored her												
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	-	VIC's only other pain at the time of this interview was from a severe sunburn she had											
gotten while at Grace.									** ***	*****			
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property contracts		stocky build, in his 40's,	last known to	hav	e facial	hair	and s	hort b	raids	or twi	Lets in	
A CONTRACTOR CONTRACTOR	his hair.											
-	Р											
**************	Q	WIT1 was able to help identify both the victim's tent (crime scene) and the DEF. The VIC										
Trick of constraints	positively identified the DEF via photo lineup.											
Spirite Commissions	Ŭ	Following Detainment, the D										
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*********	M	(IO). The DEF advised he went into his tent alone with the VIC. The DEF admitted he and										
	R	the VIC did kiss and have oral sex (both ways) and ultimately did have vaginal sex. The DEF advised the sex only lasted "a few minutes" and that he put a condom on before sex.										
printerment species		The DEF also advised the VIC's aunt (IO) was right outside the tent during the time he										
	CO											
-	N											
	N	The DEF was shown a picture of the VIC and confirmed this was the same person he had had sex with two days prior, consensually. The DEF was also shown a picture of the VIC's										
special characters.	UE	aunt (IO), and confirmed this was, in fact, the same person (VIC's aunt- IO).										
Perfectables and the Control of the	D	The VIC and DEF were identi	fied by their	DAV	ID photo					Λ.		
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