

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

STATE OF FLORIDA,
Plaintiff,
v.

CASE NO. 01-2021-CF-003691-A
DIVISION: I

ANDRE ABRAMS SR.,
Defendant _____/

**MOTION FOR APPOINTMENT OF MENTAL HEALTH EXPERT
TO EXAMINE DEFENDANT TO DETERMINE COMPETENCE TO PROCEED**

COMES NOW counsel for the defendant, Dean Galigani, pursuant to Florida Rule of Criminal Procedure 3.210(b) and Florida Statutes s. 916.115, and moves this Honorable Court to enter its Order appointing mental health expert, Dr. Jennifer Rohrer, PhD., to examine the defendant to determine competency to proceed. As grounds counsel for the defendant states the following:

1. Defendant is charged with aggravated assault.

2. Defendant was set for a change of plea based on negotiations with the State.

When counsel and defendant met to discuss the details of the plea agreement and the rights associated with the plea, it became clear that the defendant could not understand the options associated with entering a plea and/or going to trial as he often became distracted with stories unrelated to his charges.

3. Counsel discovered that defendant was a client at Meridian Behavioral Healthcare and was being treated for several diagnosed mental health diseases. Counsel received records from Meridian confirming that defendant was being treated for several diagnosed mental health diseases.

4. Counsel believes that his inability to communicate effectively with the defendant is directly related to his mental health.

5. Counsel has contacted mental health expert Dr. Jennifer Rohrer, PhD, to conduct the competency evaluation. Dr. Rohrer stated that she is available to conduct

an evaluation of the defendant.

5. Counsel certifies that this motion is made in good faith and on reasonable grounds to believe the defendant is incompetent to proceed.

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished Office of the State Attorney, by e-service this 17th day of January, 2023.

Respectfully submitted,

s/Dean Galigani
Dean Galigani FL Bar# 850152
317 NE 1st Street
Gainesville, FL 32601
(352) 375-0812
dean@galiganilaw.com