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

State of Florida Plaintiff.

Case Number: 01-2025-CF-001214-A

Division I

VS.

- 11-6

· T.

Drayon Drevell Duncan 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: Homicide, Attempting or conspiring to commit any such crime
- 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 fire multiple shots towards the victims who were located at Lewis Place Apartments. Multiple residences were hit but no individual was struck. One of the victims was taking his trash out at the time the incident occurred.
- 4. a. The defendant and one of the victims was arguing via text messages which have obtained.
- 5. 3. The messages clearly establish the defendant took responsibility for the offense and even identified the firearms used.
- 6. c. The defendant is a known gang member and the shooting was part of the gang culture and targeted rivals.
- 7. d. See Exhibit A, the mittimus of Det. Quinn which is relied upon and incorporated for the purposes of this hearing.

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

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The foregoing instrument was acknowledged before me this 5th day of May, 2025, by Pamela K. Brockway, Assistant State Attorney, who is personally known to me and who did take an oath.

NOTARY PUBLIC

CHRISTI BOATWRIGHT Commission # HH 507129 Expires April 24, 2028

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to Aubroncee S. Martin, Attorney for the Defendant, by email, this 5th day of May, 2025.

#### s/ Pamela K. Brockway

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

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