

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 [REDACTED]
[REDACTED]
penetrating [REDACTED] The Victim told the Defendant multiple times to stop [REDACTED]
 - 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.

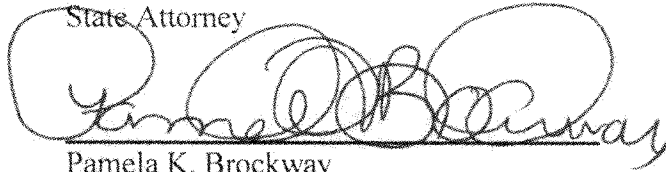
WHEREFORE, the State respectfully moves this honorable court to find that there is probable cause to believe that the Defendant committed the offense, and that the Defendant should be detained in custody pending a final hearing on Pretrial Detention.

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.


NOTARY PUBLIC

CERTIFICATE OF SERVICE



CHRISTI BOATWRIGHT
Commission # HH 507129
Expires April 24, 2028

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

ARREST SWORN COMPLAINT HOLD

EIGHTH JUDICIAL CIRCUIT

JUVENILE NOTICE TO APPEAR

OBTS NUMBER:

0108066717

AGENCY CASE REPORT NUMBER:

02-24-011667

NAME OF SUBJECT (LAST, FIRST, MI):

GILLIS, RODNEY LEE

ALIAS / MAIDEN:

911 HOME ADDRESS (STREET, APARTMENT NUMBER, ETC.):

3055 NE 28TH DR

CITY:

GAINESVILLE

STATE:

FL

ZIP CODE:

32609

TELEPHONE NUMBER:

(407) 988-8872

BUSINESS / SCHOOL ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):

TELEPHONE NUMBER:

MAILING ADDRESS (PO BOX, ETC. IF DIFFERENT THAN 911 ADDRESS):

SCARS, MARKS, TATTOOS, FACIAL HAIR, UNIQUE PHYSICAL FEATURES (LOCATION, TYPE, DESCRIPTION):

RACE:

WHITE AMERICAN INDIAN
 BLACK ASIAN / ORIENTAL

SEX:

M

DATE OF BIRTH:

03/17/1981

HEIGHT:

5'07

WEIGHT:

155

HAIR COLOR:

BLACK

EYE COLOR:

BROWN

COMPLEXION:

MEDIUM

BUILD:

MEDIUM

DRIVERS LICENSE / STATE ID NUMBER:

G420732810970

STATE OF DL / ID:

FL

SOCIAL SECURITY NUMBER:

PHOTO NUMBER:

PLACE OF BIRTH:

GAINESVILLE, FL

COUNTRY OF CITIZENSHIP:

UNITED STATES OF AMERICA

SUBJECT'S OCCUPATION:

UNEMPLOYED

SPN NUMBER:

AGENCY ORI NUMBER:

0010100

SO ID / AGENCY ID / NUMBER:

2000-01250

BOOKING NUMBER:

04-004182

LOCATION OF ARREST:

3055 NE 28TH DR

DATE OF ARREST:

08/11/2024

TIME OF ARREST (MILITARY):

14:28

DATE OF BOOKING:

08/11/2024

TIME OF BOOKING (MILITARY):

15:45

SUBJECT IDENTIFIED BY WHOM (VICTIM, WITNESS, LEO, ETC.):

VICTIM 1

SUBJECT'S NAME VERIFIED BY (PHOTO ID, FAMILY MEMBER, KNOWN TO OFFICER, ETC.):

DAVID PHOTO

#1 (NAME):

DATE OF BIRTH:

RACE:

SEX:

COURT NUMBER:

ARRESTED

SWORN COMPLAINT

NTA

FELONY

MISDEMEANOR

TRAFFIC CASE

JUVENILE:

YES

NO

#2 (NAME):

DATE OF BIRTH:

RACE:

SEX:

COURT NUMBER:

ARRESTED

SWORN COMPLAINT

NTA

FELONY

MISDEMEANOR

TRAFFIC CASE

JUVENILE:

YES

NO

JUVENILE DISPOSITION:

RELEASED TO JAC
 ISSUED NTA AND RELEASED

NAME OF PARENT / GUARDIAN (NOTIFIED YES NO):

Contains Inmate
Confidential and Protected
Crime Victim Information

WORK TELEPHONE NUMBER:

PARENT / GUARDIAN HOME ADDRESS (STREET, APARTMENT #, PO BOX, ETC.):

CITY:

STATE:

ZIP CODE:

HOME TELEPHONE NUMBER:

#1 (NAME):

ADDRESS:

3055 NE 28TH DR, GAINESVILLE FL 32609

TELEPHONE NUMBER:

#2 (NAME):

ADDRESS:

012024CFOO 2671A

TELEPHONE NUMBER:

OFFENSE DESCRIPTION:

SEXUAL BATTERY

FELONY

MISDEMEANOR

TRAFFIC NTA

COMPLETE STATUTE / ORDINANCE NUMBER:

794-011

WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION

DATE OF OFFENSE:

08/11/2024

TIME OF OFFENSE:

14:52

BAIL AMOUNT:

NUMBER:

VICTIM (NAME):

OFFENSE DESCRIPTION:

FELONY

MISDEMEANOR

TRAFFIC NTA

COMPLETE STATUTE / ORDINANCE NUMBER:

WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION

DATE OF OFFENSE:

TIME OF OFFENSE:

BAIL AMOUNT:

NUMBER:

VICTIM (NAME):

ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):

CITY:

STATE:

ZIP CODE:

THE FOLLOWING INCIDENT OCCURRED AT (ADDRESS / LOCATION):

3055 NE 28TH DR

CITY OF:

GAINESVILLE

COUNTY OF:

ALACHUA

STATE OF:

FLORIDA

On the above date, location, and approximate time, I made contact with the VIC, who made the following account:

Approximately 2-3 days prior, she was sexually battered in the tent she resides in at Grace. The VIC confirmed that she is an adult, but said she is [REDACTED]. The VIC stays at Grace with her great aunt (IO), who other residents of Grace said has been exploiting the VIC and selling sex with her in exchange for drugs. The VIC advised that this was third-party information and had not been directly confirmed with the aunt (IO).

MANDATORY APPEARANCE IN COURT AT:

DATE OF APPEARANCE:

TIME OF APPEARANCE:

I AGREE AND PROMISE TO COMPLY AND ANSWER TO THE CHARGES AND INSTRUCTIONS SPECIFIED IN THIS NOTICE TO APPEAR. WILLFUL REFUSAL TO ACCEPT AND SIGN THIS NOTICE TO APPEAR MAY RESULT IN PHYSICAL ARREST. I UNDERSTAND MY SIGNATURE IS NOT AN ADMISSION OF GUILT OR WAIVER OF MY RIGHTS.

DEFENDANT (SIGNATURE):

DATE:

SWORN TO AND SUBSCRIBED BEFORE ME THIS:

11 DAY OF August 2024

I SWEAR THE ABOVE, AND REVERSE AND ATTACHED PAGES AND STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

NAME (PRINT): FIGUEROA, AMANDA

SIGNATURE:

SIGNATURE:

TITLE:

LEO

AGENCY: GAINESVILLE POLICE DEPARTMENT LEO ID NUMBER: 1167

ARREST SWORN COMPLAINT HOLD

JUVENILE NOTICE TO APPEAR

SUPPLEMENT EIGHTH JUDICIAL CIRCUIT

OBTS NUMBER:
AGENCY ORI NUMBER:
0010100

SPN NUMBER:
AGENCY CASE REPORT NUMBER:
02-24-011667

NAME OF SUBJECT (LAST, FIRST, MI): **GILLIS, RODNEY LEE** ALIAS / MAIDEN:

RACE: WHITE AMERICAN INDIAN BLACK ASIAN / ORIENTAL
SEX: **M** DATE OF BIRTH: **03/17/1981** HEIGHT: **5'07** WEIGHT: **155** JAIL NUMBER: **2000-01250** SO ID / AGENCY ID / NUMBER:

WITNESSES
#3 (NAME): ADDRESS: TELEPHONE NUMBER:
#4 (NAME): ADDRESS: TELEPHONE NUMBER:

CHARGE
OFFENSE DESCRIPTION: FELONY MISDEMEANOR TRAFFIC NTA COMPLETE STATUTE / ORDINANCE NUMBER: VICTIM NOTIFICATION: ARREST: YES NO RELEASE: YES NO
 WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION DATE OF OFFENSE: TIME OF OFFENSE: BAIL AMOUNT: VICTIM'S TELEPHONE NUMBER:
VICTIM (NAME): ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): CITY: STATE: ZIP CODE:

CHARGE
OFFENSE DESCRIPTION: FELONY MISDEMEANOR TRAFFIC NTA COMPLETE STATUTE / ORDINANCE NUMBER: VICTIM NOTIFICATION: ARREST: YES NO RELEASE: YES NO
 WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION DATE OF OFFENSE: TIME OF OFFENSE: BAIL AMOUNT: VICTIM'S TELEPHONE NUMBER:
VICTIM (NAME): ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): CITY: STATE: ZIP CODE:

CHARGE
OFFENSE DESCRIPTION: FELONY MISDEMEANOR TRAFFIC NTA COMPLETE STATUTE / ORDINANCE NUMBER: VICTIM NOTIFICATION: ARREST: YES NO RELEASE: YES NO
 WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION DATE OF OFFENSE: TIME OF OFFENSE: BAIL AMOUNT: VICTIM'S TELEPHONE NUMBER:
VICTIM (NAME): ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): CITY: STATE: ZIP CODE:

CHARGE
OFFENSE DESCRIPTION: FELONY MISDEMEANOR TRAFFIC NTA COMPLETE STATUTE / ORDINANCE NUMBER: VICTIM NOTIFICATION: ARREST: YES NO RELEASE: YES NO
 WARRANT JUVENILE PU ORDER CIVIL ORDER CITATION DATE OF OFFENSE: TIME OF OFFENSE: BAIL AMOUNT: VICTIM'S TELEPHONE NUMBER:
VICTIM (NAME): ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.): CITY: STATE: ZIP CODE:

PROSECUTIVE SUMMARY - CONTINUED
The VIC advised that she had only recently been brought to live at Grace with her great aunt (IO). The VIC grandfather dropped her off at Grace approx. 5 days prior and she had been residing in her tent since then. On the day of the sexual battery, the VIC and her 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

[REDACTED]

The VIC stated she repeatedly told the DEF to stop and that she did not want to do this, but the DEF ignored her [REDACTED] pain during and after the incident. The VIC's only other pain at the time of this interview was from a severe sunburn she had gotten while at Grace.

[REDACTED]

The VIC knew the suspect as "Rod" and described him as a black male, approximately 5'8",

ARREST SWORN COMPLAINT HOLD

JUVENILE NOTICE TO APPEAR

SUPPLEMENT EIGHTH JUDICIAL CIRCUIT

OBTS NUMBER:
AGENCY ORI NUMBER: 0010100

SPN NUMBER:
AGENCY CASE REPORT NUMBER: 02-24-011667

NAME OF SUBJECT (LAST, FIRST, MI): GILLIS, RODNEY LEE	ALIAS / MAIDEN:
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RACE: <input type="checkbox"/> WHITE <input type="checkbox"/> AMERICAN INDIAN <input checked="" type="checkbox"/> BLACK <input type="checkbox"/> ASIAN / ORIENTAL	SEX: M	DATE OF BIRTH: 03/17/1981	HEIGHT: 5'07	WEIGHT: 155	JAIL NUMBER:	SD ID / AGENCY ID / NUMBER: 2000-01250
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#3 (NAME):	ADDRESS:	TELEPHONE NUMBER:
#4 (NAME):	ADDRESS:	TELEPHONE NUMBER:

OFFENSE DESCRIPTION:	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> TRAFFIC <input type="checkbox"/> NTA	COMPLETE STATUTE / ORDINANCE NUMBER:	VICTIM NOTIFICATION: ARREST: <input type="checkbox"/> YES <input type="checkbox"/> NO RELEASE: <input type="checkbox"/> YES <input type="checkbox"/> NO
<input type="checkbox"/> WARRANT <input type="checkbox"/> JUVENILE PU ORDER <input type="checkbox"/> CIVIL ORDER <input type="checkbox"/> CITATION	DATE OF OFFENSE:	TIME OF OFFENSE:	BAIL AMOUNT:
VICTIM (NAME):	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):		CITY: STATE: ZIP CODE:

OFFENSE DESCRIPTION:	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> TRAFFIC <input type="checkbox"/> NTA	COMPLETE STATUTE / ORDINANCE NUMBER:	VICTIM NOTIFICATION: ARREST: <input type="checkbox"/> YES <input type="checkbox"/> NO RELEASE: <input type="checkbox"/> YES <input type="checkbox"/> NO
<input type="checkbox"/> WARRANT <input type="checkbox"/> JUVENILE PU ORDER <input type="checkbox"/> CIVIL ORDER <input type="checkbox"/> CITATION	DATE OF OFFENSE:	TIME OF OFFENSE:	BAIL AMOUNT:
VICTIM (NAME):	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):		CITY: STATE: ZIP CODE:

OFFENSE DESCRIPTION:	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> TRAFFIC <input type="checkbox"/> NTA	COMPLETE STATUTE / ORDINANCE NUMBER:	VICTIM NOTIFICATION: ARREST: <input type="checkbox"/> YES <input type="checkbox"/> NO RELEASE: <input type="checkbox"/> YES <input type="checkbox"/> NO
<input type="checkbox"/> WARRANT <input type="checkbox"/> JUVENILE PU ORDER <input type="checkbox"/> CIVIL ORDER <input type="checkbox"/> CITATION	DATE OF OFFENSE:	TIME OF OFFENSE:	BAIL AMOUNT:
VICTIM (NAME):	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):		CITY: STATE: ZIP CODE:

OFFENSE DESCRIPTION:	<input type="checkbox"/> FELONY <input type="checkbox"/> MISDEMEANOR <input type="checkbox"/> TRAFFIC <input type="checkbox"/> NTA	COMPLETE STATUTE / ORDINANCE NUMBER:	VICTIM NOTIFICATION: ARREST: <input type="checkbox"/> YES <input type="checkbox"/> NO RELEASE: <input type="checkbox"/> YES <input type="checkbox"/> NO
<input type="checkbox"/> WARRANT <input type="checkbox"/> JUVENILE PU ORDER <input type="checkbox"/> CIVIL ORDER <input type="checkbox"/> CITATION	DATE OF OFFENSE:	TIME OF OFFENSE:	BAIL AMOUNT:
VICTIM (NAME):	ADDRESS (STREET, APARTMENT NUMBER, PO BOX, ETC.):		CITY: STATE: ZIP CODE:

stocky build, in his 40's, last known to have facial hair and short braids or twists in his hair.

WIT1 was able to help identify both the victim's tent (crime scene) and the DEF. The VIC positively identified the DEF via photo lineup.

Following Detainment, the DEF was brought to GPD for questioning by Det Barnes #519. The DEF was advised of his Miranda Rights from a GPD-issued Miranda Rights Warning card. The DEF advised he understood his rights, and agreed to speak with Det. Barnes.

Post-Miranda, the DEF advised he got to GRACE Marketplace two days prior (Friday August 9th 2024). That same day, the DEF stated he was introduced to the VIC by the VIC's aunt (IO). The DEF advised he went into his tent alone with the VIC. The DEF admitted he and 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. The DEF also advised the VIC's aunt (IO) was right outside the tent during the time he was in the tent alone with and having sex with the VIC, which was a total of approximately 30 minutes.

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 aunt (IO), and confirmed this was, in fact, the same person (VIC's aunt- IO).

The VIC and DEF were identified by their DAVID photo.

PROSECUTIVE SUMMARY CONTINUED

Contains Marsy's Law

Confidential and Protected

Crime Victim Information PAGE 3 OF 3