

**IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT,  
IN AND FOR VOLUSIA COUNTY, FLORIDA**

IN RE: PETITION FOR RISK PROTECTION ORDER

AGAINST {Name of Respondent} \_\_\_\_\_

VSO Case Number  
VP240021247

**AFFIDAVIT**

STATE OF FLORIDA  
COUNTY OF VOLUSIA

I, {full legal name} \_\_\_\_\_ Lindsey Campbell, in my position as {job title} \_\_\_\_\_ Detective \_\_\_\_\_ with the {name of law enforcement officer/agency} \_\_\_\_\_ Volusia Sheriff's Office \_\_\_\_\_, swear and affirm that the following facts are true and correct.

1. {Name of Respondent} \_\_\_\_\_ poses a significant danger of causing personal injury to himself/herself or others by having a firearm or any ammunition in his/her custody or control or by purchasing, possessing or receiving a firearm or any ammunition. The following specific statements, actions, or facts give rise to a reasonable fear of significant dangerous acts by the respondent:

On September 26th, 2024, at approximately 1632 hours, Deputy Wells responded to \_\_\_\_\_ in reference to a shooting that occurred at the intersection of East Plymouth Avenue and North Kansas Avenue. Deputy Wells made contact with the reporting party/victim \_\_\_\_\_ (V1).

\_\_\_\_\_ advised that he was driving his black 2003 \_\_\_\_\_ bearing Florida tag \_\_\_\_\_

\_\_\_\_\_ 5 \_\_\_\_\_ Additional pages are attached.

2. {Name of Witness} \_\_\_\_\_ provided the following information based on his/her personal knowledge:

\_\_\_\_\_ Additional pages are attached.

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Deputies attempted to BOLO (Be On The Lookout) for the suspect vehicle. Unfortunately, the vehicle was unable to be located. VC3 was forwarded the call information and were attempting to locate a suspect vehicle.

This case will require further follow-up to recover more suspect information.

On September 27, 2024, this case was assigned to Detective Campbell.

After reviewing the initial report, Detective Campbell contacted \_\_\_\_\_ by telephone. \_\_\_\_\_ indicated the same information as provided to deputies the day prior. Detective Campbell learned \_\_\_\_\_'s path of travel was via I-4 east bound, as he left work in Orlando in his black \_\_\_\_\_. He exited I-4 at SR 44 (New York Avenue, Deland), traveled north on Kepler Road, West on E Minnesota, then North on Blue Lake Avenue. Blue Lake Avenue then becomes E Plymouth Avenue. \_\_\_\_\_ then continued on E Plymouth Avenue to Boston Avenue. He then traveled North on Boston Avenue until he traveled west on \_\_\_\_\_ to his residence. \_\_\_\_\_ explained he first noticed the brown Jeep driving erratically on I4 as they both traveled east bound towards SR 44. Once they approached the off ramp for SR 44, the driver of the Jeep began to brake check him. He then passed the Jeep, exited I-4, and traveled west on SR 44. The brown Jeep then aggressively passed him and sped westbound towards N Kepler Road. \_\_\_\_\_ continued about his route home at posted speeds. Once he turned west onto E Minnesota, he observed the brown Jeep from the I4 exit just prior. The driver of the Jeep brake checked him multiple times and continued to drive erratically. \_\_\_\_\_ then passed the brown Jeep and continued his route onto Blue Lake Avenue. As both vehicles approached Deland High School (800 N Hill Avenue, Deland) the driver of the brown Jeep accelerated aggressively and attempted to overtake \_\_\_\_\_'s vehicle. In doing so, the brown Jeep began traveling in the opposing lane of traffic. While attempting overtake \_\_\_\_\_'s vehicle, the brown Jeep maneuvered in a manner that caused \_\_\_\_\_ to veer onto the shoulder of the roadway. At this point, \_\_\_\_\_ indicated he was in fear that the driver or occupants of the vehicle were intentionally trying to run him off the roadway and cause bodily harm to him. The brown Jeep then briefly stopped its effort to overtake \_\_\_\_\_'s vehicle before making a second attempt to do so. During the second attempt, the brown Jeep forced \_\_\_\_\_'s vehicle into the opposing lane of traffic by attempting to overtake it from \_\_\_\_\_'s passenger side. During this attempt, the brown Jeep's driver rear door struck \_\_\_\_\_'s passenger side mirror. The impact caused an inch long scuff upon his side mirror and bent it slightly. A third attempt to overtake \_\_\_\_\_'s vehicle was then conducted by the brown Jeep on \_\_\_\_\_'s driver side in front of Deland High School. As this attempt was

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conducted, the driver of the brown Jeep produced a black handgun and fired a single round towards [REDACTED]'s vehicle, striking the hood. The brown Jeep then turned down an unknown street further west of Kansas Avenue. [REDACTED] indicated he was in fear for his life during the entire event.

Detective Campbell reviewed mounted law enforcement technology in the path of travel described by [REDACTED]. Cameras located at [REDACTED] depict a brown, newer model Jeep Cherokee traveling ahead of [REDACTED]'s black [REDACTED] at approximately 16:14 hours. The same brown Jeep Cherokee is observed traveling north on Kepler Road to E Minnesota Avenue a few minutes later. The brown Jeep then approaches E Minnesota Avenue, where it makes a west bound turn. In this video, a handicap placard and red cloth like material appear to be hanging from the rearview mirror of the Jeep. Approximately two minutes later, [REDACTED]'s black [REDACTED] makes the same west bound turn. Shortly after that, surveillance footage mounted upon Deland High School capture the brown jeep overtaking [REDACTED]'s black [REDACTED] as he reported. A neighborhood canvas of the immediate area of where the shell casing was located (N Kansas Avenue and E Plymouth Avenue) yielded footage of a brown Jeep [REDACTED] traveling west bound on Parkdale Ct from Boston Avenue at 16:20 hours (approximately 1/2 mile from the location of incident). The Jeep then travels east bound on Parkdale Ct at 16:42, as if it had traveled to a residence or had been stationary in the cul de sac. Due to the proximity, vehicle description, and timing of the brown Jeep's presence within the aforementioned footage, Detective Campbell continued efforts to identify the Jeep.

An additional visit by detectives to the [REDACTED] area yielded the location of a brown [REDACTED] Jeep [REDACTED] (FL Tag [REDACTED] in the driveway of [REDACTED]. Detective Campbell subsequently observed an inch long abrasion to the driver rear door panel to the Jeep, consistent with [REDACTED]'s statement. Additionally observed was a handicap placard hanging from the rearview mirror and a red decorative ornament, as observed in the mounted surveillance footage. Detectives knocked on the door to the residence to attempt to contact the owners of the Jeep. After numerous minutes, a male answered the door and stated the owner, [REDACTED] (D1) was not at the residence. Phone contact was made with [REDACTED] and she responded to speak with law enforcement. During this time, the vehicle was determined to be the one involved. The vehicle was photographed and secured with evidence tape. Pratts Towing responded to the scene to transport the Jeep to the Volusia Sheriff's Office Evidence Facility. Deputy Bernard followed Pratt's Towing with the vehicle for the chain of custody. The photographs were subsequently uploaded to Evidence.com.

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\_\_\_\_\_ arrived at the residence with her boyfriend, identified as \_\_\_\_\_ (O1). Detective Campbell explained the reason for law enforcement's presence. Detective Campbell read \_\_\_\_\_ her Miranda Rights from a department issued card. \_\_\_\_\_ advised she understood her rights and wished to speak with detectives. She provided the following sworn, verbal statement:

She, \_\_\_\_\_ and her nine-year-old daughter had been in the Altamonte area in the afternoon of 9/26/2004 and arrived home around 5:00PM. She explained \_\_\_\_\_ had a few alcoholic drinks with a meal they had, so she drove them home to Deland in her brown Jeep. \_\_\_\_\_ was in the passenger seat and her daughter, \_\_\_\_\_ (O2) was a rear passenger. To get home, they traveled east on I-4 and exited at interstate at SR 44. Just prior to exiting the interstate, she observed a black car driving erratically and seemingly taunting her. She explained the \_\_\_\_\_ was being driven in an aggressive manner and had brake checked her multiple times as they utilized the exit ramp. Due to the \_\_\_\_\_'s behavior, she passed it and traveled west on SR 44 to Kepler Road. During this time, the driver of the black \_\_\_\_\_ continued to be erratic and tailgated her. She then turned north on Kepler Road, and then west on E Minnesota. Once on E Minnesota, the black \_\_\_\_\_ appeared and was tailgating her. The driver of the \_\_\_\_\_ attempted to overtake her, causing her to abruptly go through the intersection of Blue Lake Avenue to continue towards their residence. As they traveled on Blue Lake Avenue, the black \_\_\_\_\_ overtook the Jeep and drove parallel to them, in opposing traffic. The driver of the \_\_\_\_\_ then produced a black firearm and pointed it at her, placing her in fear of her life. Once the vehicles approached N Hill, the driver of the \_\_\_\_\_ maneuvered his vehicle horizontally in front of the Jeep, blocking the intersection, to keep her from continuing west bound. While doing so, the driver of the \_\_\_\_\_ continued to point a firearm in the direction of the brown Jeep. This caused her to fear for her life, so she swerved around him and went through the intersection. The black \_\_\_\_\_ then followed her and passed her as they neared Deland High School. She then overtook the black \_\_\_\_\_ in front of Deland High School. As they neared Kansas Avenue, she removed a black handgun from under the driver seat and fired a single "warning shot" towards the \_\_\_\_\_'s tires. Afterwards she sped home to \_\_\_\_\_. Once home, she had an anxiety attack. Shortly after that, the three went to Walmart and drove around looking for hurricane damage. \_\_\_\_\_ had no explanation for as to why she did not contact law enforcement during or after the incident occurred. She referenced high anxiety levels, her daughter being emotionally distressed over witnessing everything, and getting in trouble may have contributed to her decision though.

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Detectives then spoke with [REDACTED] [REDACTED] provided the following sworn verbal statement: He, [REDACTED] and [REDACTED] had been in Altamonte Springs on 9/26/2024 getting his phone repaired. They ventured back home via I-4. He had consumed an alcoholic beverage during their meal in Altamonte Springs and requested [REDACTED] drive home. During the ride, he fell asleep. [REDACTED] abruptly woke him up frantically saying someone was following them, had pointed a gun at her, and had struck their car. [REDACTED] was unsure of their exact location but believed it to be somewhere on Blue Lake Avenue. He then noticed that [REDACTED] had armed herself with handgun and noticed a black car was driving erratically near them. [REDACTED] fired a single round towards the tire of the black car and then drove home. After having an anxiety attack, the three then traveled to Walmart and around town. [REDACTED] advised he did not contact law enforcement for assistance due to being preoccupied with [REDACTED]'s anxiety attack. Detectives asked [REDACTED] if he ever saw a firearm being pointed in the vehicle of Jeep's direction. He indicated he had not.

[REDACTED] stated the firearm she discharged was a 9MM Sig Sauer (serial number 66B807106) and was currently on the back porch of the residence, disassembled. When asked if there were other firearms inside of the residence, she stated there were. She then indicated an additional 9MM Smith and Wesson handgun (serial number [REDACTED]) belonging to [REDACTED]. It was also on the back porch, and similarly disassembled. Detective Campbell asked why the firearms were disassembled to which [REDACTED] stated it was due to not having a firearm safe and her daughter living within the residence. [REDACTED] provided detectives consent to enter the residence and remove both 9MM firearms. Detectives located and collected both handguns. Both firearms were queried in NCIC/FCIC and were determined to not be stolen. They were later submitted to the District 2 evidence locker as evidence.

Based upon [REDACTED]'s sworn testimony, video surveillance, physical evidence, and [REDACTED]'s post Miranda confession, Detective Campbell determined probable cause existed to charge [REDACTED] with: Shooting a missile into an occupied conveyance, aggravated assault, child neglect, and criminal mischief with property damage under \$200.

[REDACTED] was transported to the Volusia County Branch Jail.

Two additional firearms owned by [REDACTED] were obtained from the residence. These firearms were an AR-15 style rifle (serial number [REDACTED]) and a shotgun (serial number [REDACTED]). Each were queried in NCIC/FCIC and determined to not be stolen. A family friend identified as Elizabeth Vega (O3) responded and took possession of them.

3. Affiant ☐ is ☒ is not aware of any existing protection order governing the respondent under any applicable statute.

0 Known protection orders are attached

4. The quantities, types, and locations of all firearms and ammunition the petitioner believes to be in the respondent's current ownership, possession, custody or control are as follows:

Quantity	<u>1</u>	Type	<u>Sig Sauer 9MM</u>	Location	<u>VSO Evidence</u>
Quantity	<u>1</u>	Type	<u>S&amp;W 9MM</u>	Location	<u>VSO Evidence</u>
Quantity	<u>1</u>	Type	<u>AR-15 Rifle</u>	Location	<u>[REDACTED]</u>
Quantity	<u>1</u>	Type	<u>Shotgun</u>	Location	<u>[REDACTED]</u>
Quantity	<u>        </u>	Type	<u>        </u>	Location	<u>        </u>
Quantity	<u>        </u>	Type	<u>        </u>	Location	<u>        </u>

0 Additional pages are attached.

**AFFIANT HEREBY CERTIFIES UNDER PENALTY OF PERJURY THAT THE STATEMENTS AND FACTS IN THIS AFFIDAVIT AND IN ANY ATTACHMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.**

Dated: 09/30/2024 Signature of Affiant:  73??

Sworn to (or affirmed) and subscribed before me by means of ☒ physical presence or ☐ online notarization, this 30 day of September, 2024, by Detective L Campbell  
Affiant's name

  
Signature of Attesting LEO Witness

Detective L. Johnson  
Print name of Attesting LEO Witness

OR

          
Signature of Notary Public

          
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally known or Produced Identification

          
(Type of Identification Produced)