Filing # 72165348 E-Filed 05/15/2018 02:02:35 PM

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT IN AND FOR INDIAN RIVER COUNTY, FLORIDA

CASE NO. 312016CF001421A

STATE OF FLORIDA,

Plaintiff,

VS.

JAMAL LEVON RIGGINS, JR.,

# MOTION FOR LEAVE TO ATTEND SUMMER FOOTBALL CAMP AT GARDEN CITY COMMUNITY COLLEGE IN GARDEN CITY, KANSAS

The Defendant, Jamal Levon Riggins, Jr., through his undersigned counsel, moves for leave to attend the summer football camp at Garden City Community College (GCCC) in Garden City, Kansas.

As grounds for this Motion, the Defendant would state:

- 1. The Defendant's plea agreement contemplated his attendance at college. In particular, page 2 of the plea agreement states as follows: "Defendant agrees to the probationary terms outlined in the State's written plea offer with the understanding that Defendant could seek to modify conditions 3, 5, 10, 11, 12 and 16, especially to attend college...".
- 2. Before this incident, the Defendant was a standout athlete with multiple offers from Division 1 colleges. Those offers were withdrawn as a result of these charges.
- 3. The Defendant has an opportunity to play football, and to receive a football scholarship, at GCCC. The undersigned has spoken directly with Coach Joshua Hager about the

possibility of Defendant's receiving a football scholarship. Coach Hager advises that the Defendant needs to attend the summer football camp which lasts from June 9 until June 30, 2018. A copy of Coach Hager's 5/13/18 e-mail is attached as Exhibit A.

- The Defendant is expected to graduate on or about May 19, 2018, from Sebastian River High School.
- 5. Defendant seeks court authorization to attend the summer football camp at GCCC. Permission to attend the football camp would need to include permission to travel at least a day in advance, and for return travel at least a day after the conclusion of the football camp.
- 6. If Defendant performs well enough at the football camp, Coach Hager advises that GCCC may extend an athletic scholarship offer to the Defendant.
- 7. Defendant should know for sure the status of an athletic scholarship offer by the end of the summer football camp. If offered an athletic scholarship, Defendant would elect to attend GCCC and seek to transfer his probation to Garden City, Kansas.
- 8. Defendant seeks advance court approval for temporary travel to Garden City, Kansas, in order to attend the summer football program. Only if the Defendant is offered a football scholarship would be then seek to transfer probation for the purpose of attending college.

Wherefore, the Defendant, Jamal Levon Riggins, Jr., requests leave of Court to travel to Garden City, Kansas, to attend the summer football program at GCCC which is to take place on June 9-30, 2018.

I hereby certify that a true and correct copy of the foregoing has been provided via e-service to William C. Long, ASA, Office of the State Attorney, 2000 16<sup>th</sup> Avenue, Suite 329, Vero Beach, FL 32960, at <a href="mailto:SA19eService@sa019.org">SA19eService@sa019.org</a>, this 15th day of May, 2018.

## Respectfully submitted,

## JEFFREY H. GARLAND, P.A.

By: s/ Jeffrey H. Garland

Jeffrey H. Garland, Esq. Fla. Bar No. 320765 2500 Rhode Island Ave., Suite B Fort Pierce, FL 34947-4771 Telephone (772) 489-2200 Facsimile (772) 489-0610

E-mail: jgarland@treasurecoastlawyer.com

Attorney for Defendant

Steps to get to Garden City Community College!

From: Joshua Hager

Sent: Sun, May 13, 2018 at 1:12 pm To: jgarland@treasurecoastlawyer.com

image002.jpg (12.3 KB)

image004.jpg (18.4 KB)

image006.jpg (54.5 KB)

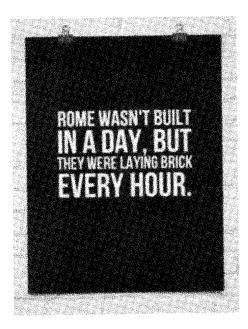
image008.png (99 KB)

- Download all

Jamal –

OUR GOAL is to:

GRADUATE, WIN A CHAMPIONSHIP, and EARN A SCHOLARSHIP but there is a lot of work from here to there.



Below are the steps necessary to transition you from home to Garden City – please follow steps and ask questions when needed so we can make transition as smooth as possible.

Bridge Program - Summer Session June 9 - 30th

(Summer is Important to start toward Graduation & Training)

- Report Day for is SATURDAY, JUNE 9th from 9:00am 5:00pm.
   If you are on the late flight into Garden City, we can arrange with prior notice. Please make us aware of when you expect to arrive. Email is great <a href="mailto:jeffrey.sims@gcccks.edu">jeffrey.sims@gcccks.edu</a>
- If you have Graduation, let us know and we will arrange for you to Report SUNDAY, JUNE 10th.

DO NOT BE LATE!

(Scheduling Transportation Early, is more Affordable)

YOU DON'T NEED TO BRING EVERYTHING FOR SUMMER – Just what is needed for 3 Weeks of School & Training

Sunday June 10th - TEAM MEETING 7pm

Your parents are welcome at meetings through Monday Night.

If your parents cannot come you are the norm so do not worry we can work through any issues.

## **Dates for Future Travel:**

Important Dates for 2018 Football Team

(In 24 years of coaching, the #1 Reason Students Fail is Attendance - Poor Students Always have a reason to leave early or arrive late, Successful Students plan or do without. It is much more affordable to schedule in advance and the Bus is 1/3 the price of plane tickets). These Dates are the student-athletes responsibility, no one else's. It is not an acceptable excuse to say, "My mother schedule my flight."

#### SUMMER BRIDGE

June 9th Arrive & Check-In for 3-Week Summer Bridge Program (Only Exception is Graduation – if You Graduate June 9th see you June 10th) - Transportation to Airport/Bus Station Provided upon Prior Request

June 11th 1st Day of Summer Bridge Classes (No Class Absences Allowed - No Late Arrivals)

June 29th Last Day of Class Summer Bridge Classes (No Class Absences Allowed – No Early Departures)

June 30th Check-Out & Depart - Transportation to Airport/Bus Station Provided upon Prior Request

## **FALL CAMP & SEMESTER**

August 2nd & 3rd Arrive & Check-In for Fall Camp & Semester - Transportation to Airport/Bus Station **Provided upon Prior Request** 

August 4th Meetings Begin

August 5th First Practice

## **HOME GAMES**

September 1st vs. Dodge City September 22nd vs. Iowa Western October 6th vs. Iowa Central October 20th vs. Highland November 10th vs. Butler

## THANKSGIVING BREAK

November 16th Depart for Break (No Early Departures) November 23rd Return for Bowl Practice (No Late Arrivals)

## SEMESTER BEGINNINGS & ENDINGS

December 7th Depart for Winter Break January 6th Return for Spring Semester

## ATTENTION these Steps need to be completed:

Due by April 2nd - Application for Admission

https://www.gcccks.edu/admission/application/

• Due by April 16th - 2017-2018 FAFSA completed (This is for SUMMER SCHOOL)

Use 2015 Tax Forms



2018-2019 FAFSA completed (FALL, SPRING, and SUMMER 2018-2019 SCHOOL

YEAR)

Use 2016 Tax Forms

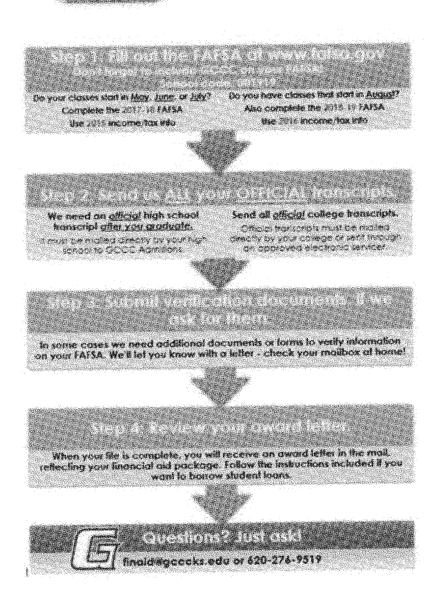
## APPLICATION FOR FAFSA DIRECT LINK https://fafsa.ed.gov/

If your classes start in the SUMMAZER (May, June, or July)

Use 2015 tax/income into
Go to www.fafsa.gov

If your classes start in the FALL (Aug. 13 or later)

Use 2016 tax/income info
Go to www.fafsa.gov



Due by May 1st
 Housing Application, Medical Form, Immunization Records, and Housing Deposit should be complete.

This year everything will be done online – the System will be ready for use starting April 1st we will send you more information, very soon.

Due by June 1st

High School Transcripts – REQUEST FROM YOUR HIGH SCHOOL IMMEDIATELY Have your high school counselor mail an Official High School Transcript with Final Grades to our registrar's office,

Garden City Community College Attn: **Nancy Unruh** 801 Campus Drive Garden City, KS 67846

(You Can Not Receive AID without an Official Transcript stating Graduation)

TB Form please complete and mail to GCCC or Go Online to complete.
 <a href="http://www.gcccks.edu/student/healthserv/">http://www.gcccks.edu/student/healthserv/</a>

2) Physicals - You must have to participate JUNE 11th, 2018

https://www.gcccks.edu/athletics/healthforms/

You can get a physical with your own doctor at home prior (Which I would recommend), remember to bring a copy of the physical form when you report, your Doctor's Office Form approving your health and ability to participate will meet our requirements. If you would like to email your physical send to our Trainers Carol Osgood <a href="mailto:carol.osgood@gcccks.edu">carol.osgood@gcccks.edu</a>

OPTION TWO - Bring \$20,00 and we will have our team doctor do it here.

3) Out-of-State Students TRAVEL:

We will provide transportation with notice by JUNE 7th from: GARDEN CITY, KANSAS - Greyhound Bus Station GARDEN CITY, KANSAS - Airport

Contact the Coaching Staff by June 7TH; Let us know how you are arriving on JUNE 9TH

Coach Beekman is our Transportation Coordinator let him know when you are arriving on June 9th so we can help you get to campus Josh Beekman joshua.beekman@gcccks.edu or (518) 928-7122, copy me jeffrey.sims@gcccks.edu

These steps should all be completed by the time you arrive for Check-In.

## Things to bring for summer school

- 1. ALARM CLOCK
- 2. Pillow / Pillow Case / Sheets / Blankets for an Extra Long Twin Bed
- 3. Towels / Wash Clothes/Soap/Shampoo/Deodorant/Toothbrush/Toothpaste/Razors/Shaving Cream
- 4. Clothes / Shoes for 3-weeks
- 5. Football Cleats, we provide Game Cleats
- 6. Pens & Spiral Notebooks
- 7. A Great Competitive Attitude plus Work Ethic

For Summer, bring the Minimum,

In Fall, Bring everything else. Where you live in summer will not be where you live in Fall,

what you bring you will have to move and we do not store it.

## SUMMER BRIDGE PROGRAM

All Incoming students will be enrolled in transferrable courses to begin the process of 18 Month Graduation Plan. In Summer Session, students will receive 6 Credits, which will give them the opportunity to Graduate in 18 months, by December 2019.

## SUMMER SCHOOL ENDS JUNE 30th & FALL REPORT DATE is AUGUST 2nd & 3rd

\*Strength & Conditioning your workouts begin when you arrive but if you want to be ready for the 2018 Season you will need to follow our strength & conditioning program through July until Fall Report Date

This will finalize the process of transitioning to Garden City Community College – Let's Get Ready to work hard and create our future. Have a GREAT END to high school – Let's Get to work, OPPORTUNITIES AHEAD.

Welcome to OPPORTUNITY, USA.

#### "RIGHT NOW"

When do we work toward Graduating from College, <u>RIGHT NOW</u>.

When do we work towards being the best football player I can be to win a Championship, <u>RIGHT NOW</u>.

When do I work to EARN my scholarship to a 4-year University, RIGHT NOW.

## Graduate, Championship, Scholarship, Jeffrey Sims

Head Football Coach
2009 & 2016 KJCCC Coach of the Year
2016 ACCFCA & NJCAA National Coach of the Year
Winningest Active Coach in the JAYHAWK CONFERENCE
2016 NJCAA NATIONAL CHAMPIONS
2016 EL TORO BOWL – 2017 HEART OF TEXAS BOWL

Garden City Community College 801 Campus Drive Garden City, KS 67846 Cell: 870-904-9059 @CoachJSims

> "Treat a man as he is, and he will remain as he is. Treat a man as he could be, and he will become what he should be." Quote by Ralph Waldo Emerson

Broncbusters Football YouTube Channel National Championship & Season Highlights:

https://www.voutube.com/watch?v=Qu\_Obet.4Y

#### #1 News Story of 2016

http://www.gctelearam.com/sports/no-sports-story-of-busters-win-title-change-kicoc-rules/article\_bffdd534\_ed74-5361\_ef24-0ce35d20b150\_html

#### School Website:

http://www.gobronebusters.com/sports/fball/index

#### National Championship Clip:

https://www.vogtube.com/waich?v=JRbrmiZk90Y

## **KJCAA Championship Clip:**

https://www.voutube.com/watch?v=in3PraPLw-c

## Home Game Clips: (By David Fernandez)

https://www.voutube.com/watch?v=LZAL16TU23g

Garden City, Kansas OPPORTUNITY, USA!!!









2014 Chestanding College of the year