

IN THE CIRCUIT COURT OF THE FOURTEEN JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR BAY COUNTY
CRIMINAL JUSTICE DIVISION

STATE OF FLORIDA

CASE NO.: 06-4016CF

v.

HENRY DICKENS
CHARLES ENFINGER

[REDACTED]
RAYMOND HAUCK

[REDACTED]
KRISTIN SCHMIDT
JOSEPH WALSH II

06-4016CF
06-4016CF
06-4016CF
06-4016CFMF
06-4016CFMG
06-4016CFMH

HAROLD B.
CLERK
BAY COUNTY

2001 AUG 23 A 10:49

FILED

STATE'S SECOND MOTION FOR ORDER IN LIMINE

THE STATE OF FLORIDA, moves this Court for an Order in Limine instructing the Attorneys for the Defendant(s) to refrain from making any direct or indirect mention whatsoever at trial before the jury of the matter(s) hereinafter set forth, without first obtaining permission from the Court outside the presence and hearing of the jury, on the grounds that said matter(s) is incompetent, irrelevant or immaterial to the issues involved herein, and will serve only to unfairly prejudice the jurors against the State thereby requiring a mistrial, pursuant to the authority of Henry v. State, 290 So.2d 73 (2d DCA 1974).

- ✓ 1. Any bad character evidence concerning Gina Jones.
- ✓ 2. Any allegations of substance abuse or alcohol abuse by Gina Jones.
- 9 3. Any hearsay statements by Gina Jones.
- 9 4. Any inquiry as to whether Gina Jones was told by any medical authority at the time of Martin Anderson's birth that Martin Anderson had sickle cell trait.
- 9 5. Any inquiry into Gina Jones' personal knowledge of the Panama

City Boot Camp, or how it operated, before Martin Anderson was admitted to the boot camp, to include any prior visits to the boot camp or any prior observation of the boot camp.

✓ 6. Any desires or wishes of Gina Jones or actual actions taken by Gina Jones to have Martin Anderson sent to the Panama City Boot Camp.

✓ 7. Any change in Gina Jones employment or financial status after Martin Anderson's death or after any civil settlement concerning his death.

✓ 8. How often Martin Anderson spent the night at his grandparents or anywhere else out of Gina Jones' home.

✓ 9. If Martin Anderson had ever ran away from home or if Gina Jones had ever asked him to leave home.

✓ 10. Any inquiry into when Gina Jones would punish Martin Anderson or what type of punishment she used to discipline Martin Anderson.

✓ 11. Any inquiry into the punishment of Martin Anderson by Gina Jones or Robert Anderson when Martin Anderson misbehaved.

✓ 12. Any inquiry into Gina Jones other children to include but not limited to:

a. where they were raised

b. what they do for a living

c. whether they have criminal history or not

d. Ms. Jones marital status at the time of their births

✓ 13. The marital status of Gina Jones at the time of Martin Anderson's birth.

✓ 14. Any opinion or observation that Gina Jones may have concerning the relationship that existed between Martin Anderson and Robert Anderson.

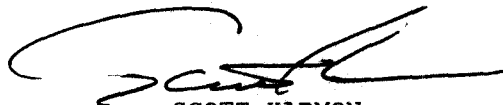
- ✓ 15. Any opinion or belief of Gina Jones as to whether Martin Anderson was associated with any criminal element or group.
- ? 16. Any investigations involving Gina Jones by the Department of Children and Families and any allegations, statements or opinions contained within any DCF records.
- ✓ 17. Any inquiry into any specific incidents where Martin Anderson misbehaved in the home and the subsequent actions of Gina Jones.
- ? 18. Any arrest or criminal history of Gina Jones including the underlying facts or charges of any arrest.
- ✓ 19. Any meetings between Gina Jones and then Governor Jeb Bush or current Governor Charlie Crist and the content of any conversation between Ms. Jones and Governor Bush or Governor Crist.

I HEREBY CERTIFY that a copy of the foregoing Motion in Limine has been furnished to Hoot Crawford, attorney for Henry Dickens, at 748 Jenks Avenue, P.O. Box 1103, Panama City, Florida 32402; Walter B. Smith, Deputy Public Defender, attorney for Charles Enfinger, at 115 East 4th Street, P.O. Box 580, Panama City, Florida 32402-0580; Robert Sombathy, attorney for

[REDACTED] at P.O. Box 430, Panama City, Florida 32402; James H. White, Jr., attorney for Raymond Hauck, at 229 McKenzie Avenue, Panama City, Florida 32401; [REDACTED] 327, Panama City, Florida 32402-0327; Jonathan Dingus, attorney for [REDACTED] [REDACTED] at 527 Jenks Avenue, Panama City, Florida 32401; Ashley Benedik, attorney for Kristin Schmidt, at 1004 Jenks Avenue, Panama City, Florida 32401; and Robert Pell, attorney for Joseph Walsh II, at 514 Magnolia Avenue, P.O. Box 651, Panama City, Florida 32401, via U.S. mail and facsimile, on this 21 day of August, 2007.

Respectfully submitted,

MARK A. OBER
STATE ATTORNEY



SCOTT HARMON
ASSISTANT STATE ATTORNEY
FLORIDA BAR #933775

SH/rje