

IN THE SUPREME COURT OF FLORIDA

FILED  
THOMAS D. HALL

2007 JUN 19 P 3:35

IN RE:

STATEWIDE GRAND JURY

CASE NO. SC

CLERK, SUPREME COURT  
SC07-1798 ✓

---

**PETITION FOR ORDER TO IMPANEL A STATEWIDE GRAND JURY**

PETITIONER, Charlie Crist, Governor of the State of Florida, respectfully petitions this Court for an order to impanel a Statewide Grand Jury pursuant to section 905.33, Fla. Stat. (2006). The grounds for this Petition are:

1. This Court has jurisdiction of this matter pursuant to section 905.33, Fla. Stat. (2006).
2. Petitioner has consulted with the Statewide Prosecutor, who would serve as the Statewide Grand Jury Legal Advisor, regarding the filing of this Petition to impanel a statewide grand jury.
3. The Statewide Prosecutor has informed Petitioner that, after consultation with the Florida Department of Law Enforcement, there is a need to investigate numerous cases of organized criminal activity, including but not limited to gang activity, throughout the State. These crimes are multi-circuit in nature, have occurred or are occurring in two or more judicial circuits, and concern criminal activity within the jurisdiction of the proposed statewide grand jury.

4. The Statewide Prosecutor has also informed Petitioner that the offenses that would be within the grand jury's inquiry are among those enumerated in section 905.34, Fla. Stat. (2006):

(1) bribery, burglary, car jacking, home-invasion robbery, criminal usury, extortion, gambling, kidnaping, larceny, murder, prostitution, perjury, and robbery;

(2) crimes involving narcotics or other dangerous drugs;

(3) violations of the provisions of the Florida RICO (Racketeer Influenced and Corrupt Organization) Act, including any offense listed in the definition of racketeering activity in section 895.02(1)(a), Fla. Stat., providing such listed offense is investigated in connection with a violation of section 895.03, Fla. Stat., the prosecution of which listed offense may continue independently if the prosecution of the violation of section 895.03 is terminated for any reason;

(4) violations of the provisions of the Florida Anti-Fencing Act (Chapter 812, Fla. Stat.);

(5) violations of the provisions of the Florida Antitrust Act of 1980 as amended;

(6) violations of the provisions of Chapter 815, Fla. Stat. (computer crimes);

(7) any crime involving, or resulting in, fraud or deceit upon any person;

- (8) violations of section 847.0135, Fla. Stat., section 847.0137, Fla. Stat., or section 847.0138, Fla. Stat., relating to computer pornography and child exploitation prevention, or any offense related to violations of section 847.0135, section 847.0137, or section 847.0138;
- (9) criminal violations of Part I of chapter 499, Fla. Stat.;
- (10) criminal violations of sections 409.920 or 409.9201, Fla. Stat.; or,
- (11) any attempt, solicitation or conspiracy to commit violations of the crimes above.

5. Petitioner, after due consideration of the information provided by the Statewide Prosecutor, for good and sufficient reason deems it to be in the public interest to impanel a statewide grand jury. Pursuant to sections 905.33 and 905.34, Fla. Stat, (2006), the grand jury would have jurisdiction throughout the State to investigate crime, return indictments, make presentments, and otherwise perform all functions of a grand jury with regard to the offenses stated herein.

6. The investigation to be conducted by this grand jury is not inherently limited to a particular section of the State. However, after due consideration of the information provided by the Statewide Prosecutor, Petitioner believes that, in the interest of convenience to prospective grand jury witnesses, law enforcement officers and others, the base operating area for the grand jury should be the Fifteenth, Seventeenth, Nineteenth, and Twentieth Judicial Circuits. Petitioner

therefore requests that, pursuant to section 905.37(2), Fla. Stat. (2006); this Court designate those judicial circuits as the base operating area for this statewide grand jury and that the prospective grand jurors be selected from those circuits.

Petitioner further requests that, pursuant to section 905.33(2), Fla. Stat. (2006), the Chief Justice designate a judge from the Fifteenth, Seventeenth, Nineteenth, or Twentieth Judicial Circuit to act as the presiding judge over the statewide grand jury.

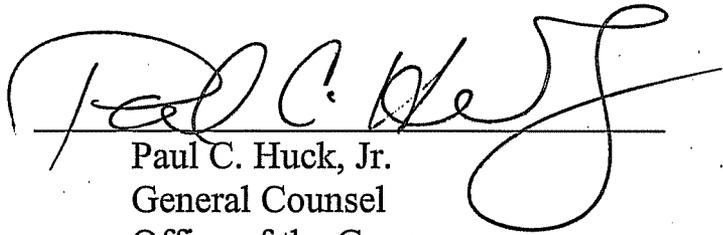
WHEREFORE, Petitioner respectfully petitions the Court for an order impaneling a statewide grand jury for a term of twelve calendar months with the jurisdiction, purpose, and base operating area set forth above.

Dated this 19<sup>th</sup> day of June, 2007.



---

Charlie Crist  
Governor  
The Capitol  
Tallahassee, Florida 32399  
Phone: (850) 488-5603

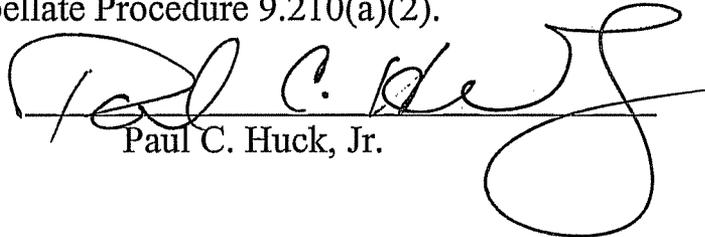


---

Paul C. Huck, Jr.  
General Counsel  
Office of the Governor  
Room 209, The Capitol  
Tallahassee, Florida 32399  
Phone: (850) 488-3494  
Florida Bar No. 968358

**CERTIFICATE OF COMPLIANCE**

I HEREBY CERTIFY that the foregoing Petition complies with the font requirements of Florida Rule of Appellate Procedure 9.210(a)(2).



---

Paul C. Huck, Jr.