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**To:** [avallone.larry@pd7.org](mailto:avallone.larry@pd7.org)

**Subject:** Questions - Pending Article

**Date:** Mon, 01 Jun 2026 15:19:08 -0400

Mr. Larry Avallone  
Assistant Public Defender  
Seventh Judicial Circuit  
State Of Florida

June 1, 2026

Ref: State V. Nicole Jackson (Maldonado)  
2021 30322 CFDB

State V. Charles Ivy  
2023 305335 CFDB

Mr. Avallone:

Our publication is currently working on an article - in which we shall express our opinion that you are NOT ethically qualified to hold the position of a circuit court judge - a position that you are currently campaigning for.

Our article is currently still in development (editing stage) - we anticipate publishing within the week.

Prior to the publication - we shall provide to you - and the other mentioned principles within this article - a chance to review the article - and response with any corrections - clarifications - comments and criticisms as deemed to be appropriate.

### **CLARITY SOUGHT**

We noticed that in your current defense of Mr. Charles Ivy - you filed a November 2023 motion with the Court - in an attempt to get a judicial order to silence the Daytona Beach police chief from making "prejudicial" statements regarding Mr. Ivy (see below linked copy). <https://volusiaexposed.com/elections/2026/larryavaollone52026/avalloneivygagmotion.pdf>

During Ms. Jackson's January 27, 2023 Nelson hearing (Judge Blackburn presiding) - Ms. Jackson expressed displeasure with your representation - in that you had not attempted to silence Volusia County Sheriff Mike Chitwood in his prejudicial statements against her.

As you know - Judge Blackburn sealed both the hearing and the transcript from public review. However, we obtained a copy of the transcript when it was posted to the Clerk's website upon the filing of the 3.850 motion (ineffective counsel).

<https://volusiaexposed.com/stateattorney/2025/nicolejackson62025/nelsontranscripts1of2.pdf>

Question 1 - on page 35 of the transcript you advise the judge - and Ms. Jackson - that there are no videos of Ms. Jackson being shot by the deputies.

Sir, there appears to be at least two videos of this shooting - one from the sheriff helicopter - and one from a body worn camera (see below link)

<https://youtu.be/ByeeeqYwoJI?si=6ilKD1cShj3h1y9F>

Please provide any clarity on your statement (video not being available).

Question - on page 48-50 of the transcript - Ms. Jackson is expressing her displeasure with your representation because you have not attempted to correct the sheriff's lies against her.

You stated on page 50 of the transcript - "So, you know, she does take it personally that there is this upswell, the swirl of information about her in the media. And a lot of it is wrong, frankly. But she sees it that it's my role to correct it. And I've tried to tell her that that's not my role. But she doesn't see it that way."

Mr. Avallone - much of that incorrect information in the media - had it's foundation in Sheriff Chitwood's social media accounts - media statements - or official VSO press releases (and not statements made by her supporters - by the time Jackson's supporters came on board - this matter was already a three ring media circus - and you know it).

We suspect by your statements (see above) - you were aware that regardless of Sheriff Chitwood allegations to the media - that the

children never fired the AK-47 rifle - AND that the deputies were firing on the children - long before Ms. Jackson exited the garage and was shot by the deputies.

In your 2023 representation of Mr. Ivy - you appear to hold that it IS your job to cease prejudicial statements by law enforcement against your client - but you seem not to have held those same beliefs regarding Ms. Jackson - and Sheriff Chitwood's prejudicial statements against her.

Can you provide any clarity on this particular subject (prejudicial statements)?

Absent clarity - we shall opine that your shifting beliefs on your job responsibilities regarding "law enforcement prejudicial statements" is evidence - in of itself - of your failure to effectively represent Ms. Jackson - AND a prime example of your ethical inability to serve on the bench.

Regards,

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