

## APPLICATION FOR NOMINATION TO THE \_CIRCUIT\_ COURT

**Instructions:** *Respond fully to the questions asked below. Please make all efforts to include your full answer to each question in this document. You may attach additional pages, as necessary, however it is discouraged. In addition to the application, you must provide a recent color photograph to help identify yourself.*

**Full Name:**   Cyrus Patrick Zomorodian        **Social Security No.:**

**Florida Bar No.:**   515337   **Date Admitted to Practice in Florida:**   9/20/2001  

1. Please state your current employer and title, including any professional position and any public or judicial office you hold, your business address and telephone number.

**State of Florida  
State Attorney's Office  
Fourth Judicial Circuit of Florida  
Assistant State Attorney (Division Chief / Circuit Court)  
311 West Monroe Street  
Jacksonville, FL 32202  
(904)255-2844 (w)**

2. Please state your current residential address, including city, county, and zip code. Indicate how long you have resided at this location and how long you have lived in Florida. Additionally, please provide a telephone number where you can be reached (preferably a cell phone number), and your preferred email address.

3. State your birthdate and place of birth.

4. Are you a registered voter in Florida (Y/N)?

**Y**

5. Please list all courts (including state bar admissions) and administrative bodies having special admissions requirements to which you have ever been admitted to practice, giving the dates of admission, and if applicable, state whether you have ever been suspended or

resigned. Please explain the reason for any lapse in membership.

**Florida Bar, 2001 – present; admitted to practice law in all Florida State Courts.**

**U.S. District Court – Middle District of FL – November 2020 – August 2022**

6. Have you ever been known by any aliases? If so, please indicate and when you were known by such alias.

N/A

**EDUCATION:**

7. List in reverse chronological order each secondary school, college, university, law school or any other institution of higher education attended and indicate for each the dates of attendance, whether a degree was received, the date the degree was received, class standing, and graduating GPA (if your class standing or graduating GPA is unknown, please request the same from such school).

**Cumberland School of Law, Samford University, Birmingham, AL; 165/193; Fall 1998 - Spring 2001; J.D.**

**The University of Alabama, Tuscaloosa, AL; MA program, no ranking; Fall 1996 - Fall 1997; M.A., Political Science**

**The American University, Washington, DC; The American University, as a policy, does not rank; Fall 1991 - Fall 1994; B.A., Political Science**

8. List and describe any organizations, clubs, fraternities or sororities, and extracurricular activities you engaged in during your higher education. For each, list any positions or titles you held and the dates of participation.

**Moot Court Executive Board, Associate Justice, Cumberland School of Law, 2000 - 2001.**

**Florida Student Bar Association, Cumberland School of Law. President (2000-2001); Secretary (1999-2000); Member (1998-2001).**

**Alpha Epsilon Lambda Graduate Honor Society, The University of Alabama, Graduate School, 1997.**

**Interfraternity Council Vice-President, The American University, Washington, DC, 1996-1997**

**Alpha Tau Omega Fraternity, Epsilon Iota Chapter, The American University,  
Washington, DC, 1994-1997**

**EMPLOYMENT:**

9. List in reverse chronological order all full-time jobs or employment (including internships and clerkships) you have held since the age of 21. Include the name and address of the employer, job title(s) and dates of employment. For non-legal employment, please briefly describe the position and provide a business address and telephone number.

**State Attorney's Office, Fourth Judicial Circuit of Florida, 311 West Monroe Street,  
Jacksonville, FL, 32202; July 2001 – Present**

**United States Department of Justice, Special Assistant U.S. Attorney, Middle  
District of Florida, November 2020 – August 2022**

**Adjunct Professor of Law, Florida Coastal School of Law, 8787 Baypine Road,  
Jacksonville, FL, 32256, January 2014 – May 2014 (Animal Law)**

**Law Clerk, Baxley, Dillard, Dauphin & McKnight, 2008 Third Avenue South,  
Birmingham, AL, 35233, May 2000 - May 2001**

**Law Internship, Jefferson County District Attorney's Office, 801 Richard  
Arrington, Jr., Boulevard North, Birmingham, AL, 35203, January 2001 – May  
2001**

**Law School Clerkship, Contract Law & Internet Law, Professor Alex Bolla,  
Cumberland School of Law, Samford University, 800 Lakeshore Drive,  
Birmingham, AL, 35229, May 1999 – September 1999**

**Graduate Assistantship, OSHA/Safe State Program, The University of Alabama,  
700 University Boulevard, Tuscaloosa, AL, 35487, September 1996 – May 1997**

**Research Analyst, Betac Corporation, 2001 North Beauregard Street, Suite 1100,  
Alexandria, VA, 22311, May 1995 - August 1996 (U.S. Department of Defense Secret  
Security Clearance)**

**Congressional Staffer, United States Senator Judd Gregg (NH), Hart Senate Office  
Building, Washington, DC, 20002, January 1995 - May 1995**

**Congressional Intern, United States Senator Connie Mack, III (FL), Hart Senate  
Office Building, Washington, DC, 20002, September 1994 – December 1994**

**Congressional Intern, United States Representative Tillie K. Fowler (FL), Cannon House Office Building, Washington, DC, 20002, January 1993 – May 1994**

10. Describe the general nature of your current practice including any certifications which you possess; additionally, if your practice is substantially different from your prior practice or if you are not now practicing law, give details of prior practice. Describe your typical clients or former clients and the problems for which they sought your services.

**I am a Circuit Division Chief at the State Attorney's Office for the Fourth Judicial Circuit of Florida. At the SAO, I supervise three to eight Circuit Assistant State Attorney's. We are charged with prosecuting general felonies which include Robbery, Burglary, Trafficking or Sale of illicit drugs, Aggravated Battery, Aggravated Assault, Grand Theft, Schemes to Defraud and other general felonies.**

**In this role, I weigh whether arrests made by law enforcement should be formally filed, whether issues exist regarding illegal search and seizure and what an appropriate State offer would be in each and every prosecutable case. All the while I must weigh the interests of justice and any input by the Victim of the crime. I weigh aggravation and mitigation in cases as I seek justice in each case I prosecute and or supervise.**

**Proudly, I have served for years as the SAO expert regarding cases involving Animal Abuse, Cruelty, Neglect and or Fighting. I frequently work with law enforcement and animal protective organizations locally and Nationally. I have given interviews to National and Local media regarding issues relating to Animal Abuse, Cruelty, Neglect and Fighting. I have provided advice to a Florida State Senator regarding crafting Legislation to protect in the interests of animals while ensuring the enshrined Florida rights of hunters. I frequently provide advice on Animal Law issues to other Assistant State Attorneys in the Fourth Judicial Circuit and other parts of the State of Florida. In 2012, I had the distinct honor to lecture to the Florida Prosecuting Attorneys Association (FPAA) on the topic of Animal Law at the State Summer Convention. I provided a lecture to the State Convention of the Florida Animal Control Association in 2011 and 2016. I have also lectured to law students and lawyers numerous times including: FAMU School of Law, Florida Coastal School of Law, Florida Animal Control Association and the Pet Alliance of Greater Orlando.**

**Regarding the Florida Bar, I have recently served two terms as an appointed Member of the Standing Committee on Professionalism. I am also a Member of the Animal Law Section. Of note, I am the Chair of the Criminal Law Committee of the Animal Law Section and a Member of the Executive Board of the Animal Law Section.**

11. What percentage of your appearance in court in the last five years or in the last five years of practice (include the dates) was:

	Court		Area of Practice
Federal Appellate	_____ %	Civil	_____ %
Federal Trial	_____ %	Criminal	<u>100</u> %
Federal Other	_____ %	Family	_____ %
State Appellate	<u>1</u> %	Probate	_____ %
State Trial	<u>99</u> %	Other	_____ %
State Administrative	_____ %		
State Other	_____ %		
TOTAL	<u>100</u> %	TOTAL	<u>100</u> %

If your appearance in court the last five years is substantially different from your prior practice, please provide a brief explanation:

12. In your lifetime, how many (number) of the cases that you tried to verdict, judgment, or final decision were:

Jury?	<u>100</u>	Non-jury?	<u>20</u>
Arbitration?	_____	Administrative Bodies?	_____
Appellate?	_____		

13. Please list every case that you have argued (or substantially participated) in front of the United States Supreme Court, a United States Circuit Court, the Florida Supreme Court, or a Florida District Court of Appeal, providing the case name, jurisdiction, case number, date of argument, and the name(s), e-mail address(es), and telephone number(s) for opposing appellate counsel. If there is a published opinion, please also include that citation.

N/A

14. Within the last ten years, have you ever been formally reprimanded, sanctioned, demoted, disciplined, placed on probation, suspended, or terminated by an employer or tribunal before which you have appeared? If so, please state the circumstances under which such

action was taken, the date(s) such action was taken, the name(s) of any persons who took such action, and the background and resolution of such action.

N/A

15. In the last ten years, have you failed to meet any deadline imposed by court order or received notice that you have not complied with substantive requirements of any business or contractual arrangement? If so, please explain full.

N/A

16. For your last six cases, which were tried to verdict or handled on appeal, either before a jury, judge, appellate panel, arbitration panel or any other administrative hearing officer, list the names, e-mail addresses, and telephone numbers of the trial/appellate counsel on all sides and court case numbers (include appellate cases). *This question is optional for sitting judges who have served five years or more.*

**State of Florida v. Hector Sanchez-Torres**  
**3.851 Hearing / (Capital Post-Conviction)**  
**10-2009-CF-671-AXXX**  
**Defense Counsel Francis Jerome Shea**

**State of Florida v. Roosevelt James & State of Florida v. Ryan Evans (Co-D's)**  
**Jury Trial**  
**16-2020-CF-10402-AXXX & 16-2020-CF-10406-AXXX**  
**ASA Co-Counsel Ju Young Jang, Esq.**  
**Defense Counsel APD Adam Beagh, Esq.**  
**Defense Counsel Yiolanta Jones, Esq.**

**State of Florida v. Darren Cooley**  
**Jury Trial**  
**16-2022-CF-8190-AXXX**  
**ASA Co-Counsel James Netter, Esq.**  
**Defense Counsel Chris Page, Esq.**

**State of Florida v. Carnell Davis**  
**Jury Trial**  
**16-2022-CF-8190-AXXX**  
**ASA Co-Counsel Laura Hartung, Esq.**  
**Defense Counsel Tyler Gates, Esq.**

**United States v. Evonte E. Glover & Terry L. Shuman**  
**Contested Sentencing Hearing**  
**Federal Court**  
**AUSA Co-Counsel Kevin Frein, Esq.**

**Defense Counsel Mark Rosenblum, Esq.**

**United States v. Ronnie Jerome Jones**

**Jury Trial**

**16-2013-CF-011357-AXXX**

**AUSA Co-Counsel Laura Taylor, Esq.**

**Defense Counsel Lisa Call, Esq.**

17. For your last six cases, which were either settled in mediation or settled without mediation or trial, list the names and telephone numbers of trial counsel on all sides and court case numbers (include appellate cases). *This question is optional for sitting judges who have served five years or more.*

**State v. Justin Monroe**

**16-2023-CF-1250-AXXX**

**Defense Counsel Jarahn Newman, Esq.**

**State v. Timothy W. Robinson, Jr.**

**16-2024-CF-3776-AXXX**

**Defense Counsel APD Michael Barbieri, II**

**State v. Wilfredo M. Reyes**

**16-2024-CF-3141-AXXX**

**Defense Counsel Zachary Shafer, Esq.**

**State v. Jana M. Paulk**

**16-2023-CF-4675-AXXX**

**Defense Counsel O. David Barksdale, Esq.**

**State v. Jesse Martin**

**16-2024-CF-8743-AXXX**

**Defense Counsel APD Troy Farquhar, Esq.**

**State v. Kheybren Thomas-Rudolph**

**16-2023-CF-7213-AXXX**

**Defense Counsel APD Summer Martin, Esq.**

18. During the last five years, on average, how many times per month have you appeared in Court or at administrative hearings? If during any period you have appeared in court with greater frequency than during the last five years, indicate the period during which you appeared with greater frequency and succinctly explain.

**Approximately three to four times per week.**

19. If Questions 16, 17, and 18 do not apply to your practice, please list your last six major transactions or other legal matters that were resolved, listing the names, e-mail addresses, and telephone numbers of the other party counsel.

N/A

20. During the last five years, if your practice was greater than 50% personal injury, workers' compensation or professional malpractice, what percentage of your work was in representation of plaintiffs or defendants?

N/A

21. List and describe the five most significant cases which you personally litigated giving the case style, number, court and judge, the date of the case, the names, e-mail addresses, and telephone numbers of the other attorneys involved, and citation to reported decisions, if any. Identify your client and describe the nature of your participation in the case and the reason you believe it to be significant.

**(1) United States v. Evonte E. Glover & Terry L. Shuman, Middle District of Florida, Case 3:20-cr-72-TJC-MCR, Honorable Timothy Corrigan, Contested Sentencing Hearing. I was assisted by AUSA AUSA Kevin Frein, Esq. The Defendants were represented by This was a Contested Sentencing Hearing in which we sought an enhanced sentence and for the Court to exceed the Federal guidelines. On November 10, 2019, officers with the Jacksonville Sheriff's Office (JSO) responded to a search for a vehicle involved in a shooting. JSO ultimately located the vehicle, a stolen white Honda CRV, in the driveway of 1262 Delmar Street, Jacksonville, Florida. Upon making contact, officers observed Evonte Earl Glover being helped out of the backseat of the Honda CRV by a female, later identified as Glover's girlfriend, Samantha Murray, who had been summoned via cellphone to come and assist Glover. Glover was suffering from several gunshot wounds.**

Fire Rescue personnel responded and while they were treating Glover, a firefighter located a 22-round capacity extended Glock .40 caliber magazine loaded with 15 rounds of ammunition in Glover's left front pocket. A witness advised a JSO officer that he had seen another black male run from the area and throw a silver object. JSO officers conducted a search of the area and located Terry Lavon Shuman, who was in possession of the keys to the Honda CRV. JSO utilized a canine officer to conduct an article search of the area and located a silver and black handgun laying on the ground inside a dry storm drain which was in the path of Shuman's flight. The firearm was identified as a Smith and Wesson, 9mm pistol, equipped with a 15-round capacity magazine that had 10 rounds of ammunition in the magazine and one round of ammunition in the chamber. DNA recovered from the pistol and the magazine matched Shuman's DNA. Officers also responded to a secondary scene at 5021 Quan Drive where they found the body of J. M., who was killed from multiple gunshots was found with a Taurus, .40 caliber pistol, in his hand. JSO officers located, among other things, debris from the Honda CRV, numerous shell casings, and a Glock, .40 caliber pistol. The Glock pistol had an empty magazine inserted. The Glock pistol, Smith and Wesson pistol, Taurus pistol, and the shell casings recovered from the scene were sent to the Florida Department of Law Enforcement laboratory. The laboratory determined that 15 of the casings were fired from the Glock pistol, 3 of the casings were fired from the Smith and Wesson pistol, and 11 of the casings were fired from the Taurus pistol. The Glock pistol recovered from the scene was the same make and caliber as the Glock, .40 caliber magazine located in Glover's pocket. The Glock pistol was also manufactured outside the State of Florida. Officers obtained area surveillance footage, which showed a white Honda CRV had arrived at Quan Avenue, two males exited the Honda CRV, an exchange of gunfire occurred between the two males and J.M., and then the Honda CRV immediately fled the area. The Glock pistol was recovered in the immediate vicinity of where the Honda CRV fled from. Cell site data from Glover's cellphone linked the phone to both crime scene locations. The Defendants were both Sentenced to 100 months in the Federal Bureau of Prisons. Chief Judge Corrigan also stated, on the record, that this was the second most serious Felon in Possession of a Firearm case he had presided over in his time on the bench.

2) State v. Julian Desue, IV, 10-2003-CF-001353-AXXX, Clay County Circuit Court, Honorable William Wilkes, (2/9 - 2/10/2004). I was assisted by ASA Dan Skinner. The Defendant was represented by Bruce Culbert, Esq. The Defendant was tried before a Clay County Jury for the crimes of Armed Robbery (Firearm) and Fleeing or Attempting to Elude a Police Officer. The Defendant robbed a young clerk at a convenience store during the early morning hours. The Defendant was armed with a loaded firearm and pointed the firearm at the clerk in the course of the Armed Robbery. The Defendant obtained a paper bag with money from the cash register. Just prior to leaving the store, the Defendant also stole the container for donations for disabled children (which was located adjacent to the cash register). The Defendant was spotted a short distance from the scene of the Armed Robbery. The Defendant fled from police in a lengthy car chase across Clay County. The Defendant was apprehended after crashing the vehicle into a tree. The Defendant was positively identified by the Victim clerk. The criminal actions of the Defendant were

captured on store surveillance video. The same loaded gun used in the crime, and bag of money, were recovered from the car the Defendant was driving. The Defendant confessed in writing to the crime. At trial the Defendant alleged his statement was not a confession and he did not know he was fleeing from police. Further, the Defendant denied committing the Armed Robbery. The Defendant was found guilty and Sentenced to mandatory Life in prison as a Prison Release Reoffender. Prior to this crime the Defendant was a seven time convicted felon. At the time the Defendant committed this crime he was on Probation to Bradford County for Robbery.

3) State v. Donald Sykes, 10-2003-CF-000252-AXXX, Clay County Circuit Court, Honorable William Wilkes, (3/15 - 3/16/2004). I was assisted by ASA Dan Skinner. The Defendant conducted the jury trial *Pro Se*. The Defendant was tried before a Clay County Jury for the crimes of Trafficking in Heroin and Trafficking in Cocaine. The Defendant called 911 (recorded) and stated he was in fear that his house was being robbed. Clay County Sheriff's Officers responded to the house of the Defendant. The Defendant was asked to come out of the house, which he complied with, so the police could conduct a brief sweep of the interior of the house to locate possible perpetrators. The police found no other persons in the house or signs of forced entry. The Defendant was asked to contact a family member for assistance. While back inside his bedroom with a Clay County Sheriff's Officer, the Defendant attempted to point a loaded Mac-10 firearm at the Officer. The Officer was able to disarm the Defendant without struggle. A further search of the house revealed trafficking amounts of heroin and cocaine, as well as more firearms. The Defendant alleged multiple defenses at trial. The Defendant was found guilty and Sentenced to 30 years in prison, concurrent. The Defendant had several prior Felony convictions; including for Robbery, Possession of a Firearm by a Convicted Felon and various drug offenses.

4) State v. Lavario Ray & State v. Damontrio Glee, 16-2005-CF-005667-AXXX, 16-2005-CF-005667-BXXX, 16-2005-CF-004840-AXXX, 16-2005-CF-004840-BXXX, Duval County Circuit Court, Honorable Donald R. Moran, Jr., (9/21 - 9/25/2009). The Defense attorneys were W. Charles Fletcher, Esq., and Lynn Martin, Esq. I conducted this jury trial as equal counsel with ASA Rich Mantei. This week long jury trial consisted of two Defendants with two juries. The Defendants were represented by Charles "Chuck" Fletcher, Esq., and Lynn Martin, Esq. The Defendants were tried for numerous crimes including First Degree Murder (two Counts), Racketeering, Conspiracy to Traffic in Cocaine (two Counts), Tampering with Evidence and Conspiracy to Purchase or Possess Cocaine with Intent to Sell. The Defendants had murdered two Victims (alleged drug dealers) during a drug transaction. The Defendants were also tried for Racketeering due to an abject pattern of criminal activity. At trial, I handled and entered numerous pieces of evidence. Further, as this case arose out of a lawful wiretap case, I presented hours of lawful wiretap testimony to the juries. This required me to construct complex Predicates for the entry of the lawful wiretap recordings. The Defendants were found guilty as charged for numerous Counts and both Sentenced to Life in prison. Due to the complexity and volatile nature of the case(s),

**this week long jury trial was conducted by Fourth Judicial Circuit of Florida Chief Judge Donald R. Moran, Jr.**

**(5) State v. Bernard Johnson & State v. Joshua Martin, 16-2010-CF-000110-AXXX & 16-2010-CF-000041-AXXX, Duval County Circuit Court, Honorable David Gooding, (12/13-12/15/2010). I conducted this jury trial as equal counsel with ASA Joe Sonson. This jury trial consisted of two Defendants with two juries. The Defendants were represented by Anthony Rosati, Esq., and Mechelle Herrington, Esq. The Defendants were tried before a Duval County jury for Home Invasion Robbery with a Firearm and Aggravated Battery. These two co-Defendants, along with another co-Defendant who testified for the State at jury trial, randomly selected a house to rob due to finding the garage door open in the middle of the night. The husband Victim had inadvertently left the garage open before going to bed. Further, the victim husband was suffering from brain cancer and taking out the trash was one of the very few activities he could still perform. The Defendants entered the home and terrorized the husband and wife. The Defendants then ransacked the house and stole electronics, jewelry and other valuables. Of note, the Defendants stole the engraved Rolex watch of the husband Victim which he had earned in his occupation as a PGA golf caddie. The case was complex due to a jury trial with two Defendants and two juries. The State also presented evidence from the scene of the crime and two subsequent locations. The Defendants were each convicted and both Sentenced to Life in prison.**

22. Attach at least two, but no more than three, examples of legal writing which you personally wrote. If you have not personally written any legal documents recently, you may attach a writing sample for which you had substantial responsibility. Please describe your degree of involvement in preparing the writing you attached.

**Attached.**

#### **PRIOR JUDICIAL EXPERIENCE OR PUBLIC OFFICE**

23. Have you ever held judicial office or been a candidate for judicial office? If so, state the court(s) involved, the dates of service or dates of candidacy, and any election results.

**N/A**

24. If you have previously submitted a questionnaire or application to this or any other judicial nominating commission, please give the name(s) of the commission, the approximate date(s) of each submission, and indicate if your name was certified to the Governor's Office for consideration.

**Fourth Judicial Circuit / Circuit Judge / January 2014 (Certified)**

**Fourth Judicial Circuit / Duval County Judge / June 2014**

**Fourth Judicial Circuit / Circuit Judge / September 2014 (Certified)**

**Fourth Judicial Circuit / Circuit Judge / November 2014 (Certified)**

**Fourth Judicial Circuit / Duval County Judge / February 2015 (Certified)**

**Fourth Judicial Circuit / Circuit Judge / May 2015 (Certified)**

**Fourth Judicial Circuit / Circuit Judge / October 2015 (Certified)**

**Fourth Judicial Circuit / Duval County Judge / February 2016**

**Fourth Judicial Circuit / Circuit Judge / March 2016 (Certified)**

**Seventh Judicial Circuit / Circuit Court / November 2020**

**Seventh Judicial Circuit / County Court / August 2021**

**Seventh Judicial Circuit / Saint Johns County Court / July 2025**

**Seventh Judicial Circuit / Circuit Court/ July 2025 (Certified)**

25. List any prior quasi-judicial service, including the agency or entity, dates of service, position(s) held, and a brief description of the issues you heard.

N/A

26. If you have prior judicial or quasi-judicial experience, please list the following information:

- (i) the names, phone numbers and addresses of six attorneys who appeared before you on matters of substance;
- (ii) the approximate number and nature of the cases you handled during your tenure;
- (iii) the citations of any published opinions; and
- (iv) descriptions of the five most significant cases you have tried or heard, identifying the citation or style, attorneys involved, dates of the case, and the reason you believe these cases to be significant.

N/A

27. Provide citations and a brief summary of all of your orders or opinions where your decision was reversed by a reviewing court or where your judgment was affirmed with significant criticism of your substantive or procedural rulings. If any of the opinions listed were not officially reported, attach copies of the opinions.

N/A

28. Provide citations for significant opinions on federal or state constitutional issues, together with the citation to appellate court rulings on such opinions. If any of the opinions listed were not officially reported, attach copies of the opinions.

N/A

29. Has a complaint about you ever been made to the Judicial Qualifications Commission? If so, give the date, describe the complaint, whether or not there was a finding of probable cause, whether or not you have appeared before the Commission, and its resolution.

N/A

30. Have you ever held an attorney in contempt? If so, for each instance state the name of the attorney, case style for the matter in question, approximate date and describe the circumstances.

N/A

31. Have you ever held or been a candidate for any other public office? If so, state the office, location, dates of service or candidacy, and any election results.

N/A

### **NON-LEGAL BUSINESS INVOLVEMENT**

32. If you are now an officer, director, or otherwise engaged in the management of any business enterprise, state the name of such enterprise, the nature of the business, the nature of your duties, and whether you intend to resign such position immediately upon your appointment or election to judicial office.

N/A

33. Since being admitted to the Bar, have you ever engaged in any occupation, business or profession other than the practice of law? If so, explain and provide dates. If you received any compensation of any kind outside the practice of law during this time, please list the amount of compensation received.

N/A

### **POSSIBLE BIAS OR PREJUDICE**

34. The Commission is interested in knowing if there are certain types of cases, groups of entities, or extended relationships or associations which would limit the cases for which you could sit as the presiding judge. Please list all types or classifications of cases or litigants for which you, as a general proposition, believe it would be difficult for you to sit as the presiding judge. Indicate the reason for each situation as to why you believe you might be in conflict. If you have prior judicial experience, describe the types of cases from which you have recused yourself.

**I am an appointed Trustee, by Governor Ron DeSantis, at Saint Johns River State College (three campuses; Saint Augustine, Palatka, Orange Park). Thus, I would entertain any recusal request regarding cases involving Saint Johns River State College.**

**My wife is employed by . I would entertain any recusal request regarding cases involving Truist Financial Corporation.**

## PROFESSIONAL ACCOMPLISHMENTS AND OTHER ACTIVITIES

35. List the titles, publishers, and dates of any books, articles, reports, letters to the editor, editorial pieces, or other published materials you have written or edited, including materials published only on the Internet. Attach a copy of each listed or provide a URL at which a copy can be accessed.

N/A

36. List any reports, memoranda or policy statements you prepared or contributed to the preparation of on behalf of any bar association, committee, conference, or organization of which you were or are a member. Provide the name of the entity, the date published, and a summary of the document. To the extent you have the document, please attach a copy or provide a URL at which a copy can be accessed.

N/A

37. List any speeches or talks you have delivered, including commencement speeches, remarks, interviews, lectures, panel discussions, conferences, political speeches, and question-and-answer sessions. Include the date and place they were delivered, the sponsor of the presentation, and a summary of the presentation. If there are any readily available press reports, a transcript or recording, please attach a copy or provide a URL at which a copy can be accessed.

**In January of 2025, I was appointed by Governor Ron DeSantis to the Board of Trustees for Saint Johns River State College (three campuses; Saint Augustine, Orange Park, Palatka). I attend a Board Meeting one afternoon per month and generally give brief comments during the public Board Meeting. The audiences are approximately 20-50 State college administration and students.**

**On October 12, 2023, I was Moderator and conducted a live Panel discussion before Members of the Chester Bedell American Inn of Court. The nature of my input was as a Moderator, acknowledging questions from the audience and raising my own questions. The Panel members were Michael Feinberg, Esq., Marianne Aho, Circuit Judge of the Fourth Judicial Circuit and Assistant U.S. Attorney Rodney Brown. I addressed an audience of approximately 75-100 County Judges, Circuit Judges, attorneys and law students.**

**On March 11, 2021, I was a Panel member regarding discussion on Zoom before Members of the Chester Bedell American Inn of Court. The nature of my input was as a prosecutor, plea negotiations and plea dialogues. The Moderator was Elizabeth White, Esq. The other Panel members were Jon Phillips, Esq., The Honorable Joel Toomey, Federal Magistrate, The Honorable Stephen Whittington, Fourth Judicial Circuit Judge. I addressed an audience of approximately 75-100 County Judges, Circuit Judges, attorneys and law students.**

**In February of 2020, 2019 and 2018, I addressed the students at FAMU School of Law in Orlando, Florida. I lectured on the topic of Animal Law and Criminal Law. The groups of students comprised the Student Animal Legal Defense Society and Criminal Law Society. <https://www.jaxdailyrecord.com/article/state-attorney-launches-new-crime-against-animals-program>**

**In February 2020, I lectured at the Pet Alliance of Greater Orlando on the topic of Animal Law and Criminal Law. The all day program featured several Attorney speakers on various topics of Animal Law. The program was recorded and approved for Florida Bar CLE credit.**

**In December 2019, I was video recorded for a short presentation to the Jacksonville Transportation Authority (JTA). The video was one of several to be shown as all day training for the various operators and employees of JTA. The topic was the role of the State Attorney's Office and the interest of the SAO in working with JTA operators and employees. I serve as a SAO liaison to the Jacksonville Transportation Authority.**

**In June of 2018, I was audio and video recorded in an interview by Clay Today, a newspaper local to Clay County, Florida. The interview was of Fourth Circuit Chief Assistant Attorney (now Circuit Judge) L.E. Hutton and I. <https://www.claytodayonline.com/stories/prosecutors-look-to-era-of-transparency-smart-justice,11876>**

**On February 23, 2018, I was one of three Speakers to address students and Faculty at Florida Coastal School of Law on the topic of Animal Law. My lecture was regarding the Criminal Law aspect of Animal Law. <https://www.facebook.com/CoastalLaw/photos/a.1606623426041882/1606629316041293/?type=3&theater>**

**From January to May of 2016, I served as an Adjunct Professor of Law at Florida Coastal School of Law. I taught the elective class, "Animals and the Law", to 2L and 3L law students. For this teaching obligation, I lectured for one hour and fifty minutes one night per week. Additionally, I dedicated approximately eight (8) to ten (10) hours preparing for each class.**

**On March 11, 2016, I lectured to the Florida Animal Control Association (FACA) regarding search warrants, building successful cases and various associated legal issues. The attendees were sworn law enforcement and animal care professionals. I estimate 75 to 100 persons were in attendance. One night of my accommodations was paid for by the FACA.**

**On March 31, 2015, I addressed the Florida Coastal School of Law Student Animal Legal Defense Society. The topic of the speech was various topics in Animal Law with an emphasis on Animal Law in area of Criminal Law. I addressed an audience of approximately 15 to 20 law students.**

**On November 14, 2013, I presented a one hour lecture to the Florida Law Enforcement Property Recovery Unit (FLEPRU). The topic of the lecture was Dealing in Stolen Property law and associated Federal and State Caselaw. I lectured to an audience of approximately 100 to 125 sworn law enforcement, Assistant State Attorneys and loss prevention officers from the private sector.**

**On November 12, 2012, I presented a one hour lecture to the Florida Prosecuting Attorneys Association (FPAA). The topic of the lecture was regarding "Animal Abuse, Fighting, Cruelty and Neglect in Florida". I lectured to an audience of approximately 125 to 175 Assistant State Attorneys from around the State of Florida.**

**On November 19, 2011, I presented a lecture the the Florida Animal Control Association (FACA). The topic of the lecture was regarding the collection and preservation of evidence at crime scenes involving animals, prosecution of crimes regarding animals and relevant legal issues. I lectured to an audience of approximately 75 to 125 animal control professionals and attorneys.**

**On May 18, 2011, I presented a two hour lecture to the Jacksonville Beach Police Department (JPD). The topic of the lecture was Court testimony, case preparation and report writing. I lectured to an audience of approximately 25 to 40 police officers and Detectives.**

**On February 01, 2011, I addressed the Jacksonville Sheriff's Office Detectives. The topic of the speech was prosecution and law enforcement cooperation, in general. I addressed an audience of approximately 100 to 150 Detectives.**

**On June 24, 2010, I addressed the Assistant State Attorneys of the Fourth Judicial Circuit of Florida. The topic was Search and Seizure law. I addressed an audience of approximately 75 to 100 Assistant State Attorneys.**

**In 2009, I addressed the Assistant State Attorneys of the Fourth Judicial Circuit of Florida. The topic was Case Preparation and Filing. I addressed an audience of approximately 75 to 100 Assistant State Attorneys.**

**In 2003, I addressed the Assistant State Attorneys of the Fourth Judicial Circuit of Florida. The topic was Legislative changes in the Laws of the State of Florida. I addressed an audience of approximately 70 to 90 Assistant State Attorneys.**

- 38. Have you ever taught a course at an institution of higher education or a bar association? If so, provide the course title, a description of the course subject matter, the institution at which you taught, and the dates of teaching. If you have a syllabus for each course, please provide.**

**Yes, January 2014 to May 2014, I served as an Adjunct Professor of Law at Florida Coastal School of Law. I taught the elective class, "Animals and the Law", to 2L and 3L law students. For this teaching obligation, I lectured for one hour and fifty minutes one night per week. Additionally, I dedicated approximately eight (8) to ten (10) hours preparing for each class. The Syllabus is attached hereto.**

- 39. List any fellowships, honorary degrees, academic or professional honors, honorary society memberships, military awards, and any other special recognition for outstanding service or achievement. Include the date received and the presenting entity or organization.**

**Outstanding Service - Project Guardian  
November 2020 – August 2022  
United States Attorney’s Office, Middle District of Florida**

**Sentinel Award  
November 2010  
Florida Animal Control Association**

- 40. Do you have a Martindale-Hubbell rating? If so, what is it and when was it earned?**
- 41. List all bar associations, legal, and judicial-related committees of which you are or have been a member. For each, please provide dates of membership or participation. Also, for each indicate any office you have held and the dates of office.**

**Florida Bar / 2001 – present  
Standing Committee on Professionalism, (Appointed 2018-2024)  
Animal Bar Section  
Chair, Criminal Law Committee (2019 – present)  
Executive Board (2019 – present)**

**Saint Johns County Bar Association (2025 – present)**

**Federalist Society (2025 – present)**

**Chester Bedell American Inn of Court , Master/Bencher (2019 – present)**

- 42. List all professional, business, fraternal, scholarly, civic, charitable, or other organizations, other than those listed in the previous question to which you belong, or to which you have belonged since graduating law school. For each, please provide dates of membership or participation and indicate any office you have held and the dates of office.**

**Northeast Florida Great Banquet (Cursillo) (2009-present)**

**Costa Rica Mission Trip – October 2018**

**Feeding Northeast Florida**

**City Rescue Mission**

**Dreams Come True**

43. Do you now or have you ever belonged to a club or organization that in practice or policy restricts (or restricted during the time of your membership) its membership on the basis of race, religion (other than a church, synagogue, mosque or other religious institution), national origin, or sex (other than an educational institution, fraternity or sorority)? If so, state the name and nature of the club(s) or organization(s), relevant policies and practices and whether you intend to continue as a member if you are selected to serve on the bench.

N/A

44. Please describe any significant pro bono legal work you have done in the past 10 years, giving dates of service.

N/A

45. Please describe any hobbies or other vocational interests.

**I enjoy spending time with my family; including domestic and international travel. We worship at Church where we are active members and have served on several Mission trips. I also enjoy jogging (lightly), lifting weights, yard work, casual bike riding, reading, watching movies, following current events, caring for our four adopted cats and walking my retired greyhound.**

46. Please state whether you have served or currently serve in the military, including your dates of service, branch, highest rank, and type of discharge.

N/A

47. Please provide links to all social media and blog accounts you currently maintain, including, but not limited to, Facebook, Twitter, LinkedIn, and Instagram.

## **FAMILY BACKGROUND**

48. Please state your current marital status. If you are currently married, please list your spouse's name, current occupation, including employer, and the date of the marriage. If you have ever

been divorced, please state for each former spouse their name, current address, current telephone number, the date and place of the divorce and court and case number information.

**I am happily married since** \_\_\_\_\_, **to** \_\_\_\_\_ **is employed by** \_\_\_\_\_

49. If you have children, please list their names and ages. If your children are over 18 years of age, please list their current occupation, residential address, and a current telephone number.

#### **CRIMINAL AND MISCELLANEOUS ACTIONS**

50. Have you ever been convicted of a felony or misdemeanor, including adjudications of guilt withheld? If so, please list and provide the charges, case style, date of conviction, and terms of any sentence imposed, including whether you have completed those terms.

**No**

51. Have you ever pled nolo contendere or guilty to a crime which is a felony or misdemeanor, including adjudications of guilt withheld? If so, please list and provide the charges, case style, date of conviction, and terms of any sentence imposed, including whether you have completed those terms.

**No**

52. Have you ever been arrested, regardless of whether charges were filed? If so, please list and provide sufficient details surrounding the arrest, the approximate date and jurisdiction.

**No**

53. Have you ever been a party to a lawsuit, either as the plaintiff, defendant, petitioner, or respondent? If so, please supply the case style, jurisdiction/county in which the lawsuit was filed, case number, your status in the case, and describe the nature and disposition of the matter.

**No**

54. To your knowledge, has there ever been a complaint made or filed alleging malpractice as a result of action or inaction on your part?

No

55. To the extent you are aware, have you or your professional liability carrier ever settled a claim against you for professional malpractice? If so, give particulars, including the name of the client(s), approximate dates, nature of the claims, the disposition and any amounts involved.

N/A

56. Has there ever been a finding of probable cause or other citation issued against you or are you presently under investigation for a breach of ethics or unprofessional conduct by any court, administrative agency, bar association, or other professional group. If so, provide the particulars of each finding or investigation.

N/A

57. To your knowledge, within the last ten years, have any of your current or former co-workers, subordinates, supervisors, customers, clients, or the like, ever filed a formal complaint or accusation of misconduct including, but not limited to, any allegations involving sexual harassment, creating a hostile work environment or conditions, or discriminatory behavior against you with any regulatory or investigatory agency or with your employer? If so, please state the date of complaint or accusation, specifics surrounding the complaint or accusation, and the resolution or disposition.

N/A

58. Are you currently the subject of an investigation which could result in civil, administrative, or criminal action against you? If yes, please state the nature of the investigation, the agency conducting the investigation, and the expected completion date of the investigation.

N/A

59. Have you ever filed a personal petition in bankruptcy or has a petition in bankruptcy been filed against you, this includes any corporation or business entity that you were involved with? If so, please provide the case style, case number, approximate date of disposition, and any relevant details surrounding the bankruptcy.

N/A

60. In the past ten years, have you been subject to or threatened with eviction proceedings? If yes, please explain.

N/A

61. Please explain whether you have complied with all legally required tax return filings. To the extent you have ever had to pay a tax penalty or a tax lien was filed against you, please explain giving the date, the amounts, disposition, and current status.

**My wife and I have filed all required tax returns and have not encountered any tax penalties or tax liens.**

## HEALTH

62. Are you currently addicted to or dependent upon the use of narcotics, drugs, or alcohol?

No

63. During the last ten years have you been hospitalized or have you consulted a professional or have you received treatment or a diagnosis from a professional for any of the following: Kleptomania, Pathological or Compulsive Gambling, Pedophilia, Exhibitionism or Voyeurism? If your answer is yes, please direct each such professional, hospital and other facility to furnish the Chairperson of the Commission any information the Commission may request with respect to any such hospitalization, consultation, treatment or diagnosis. ["Professional" includes a Physician, Psychiatrist, Psychologist, Psychotherapist or Mental Health Counselor.] Please describe such treatment or diagnosis.

No

64. In the past ten years have any of the following occurred to you which would interfere with your ability to work in a competent and professional manner: experiencing periods of no sleep for two or three nights, experiencing periods of hyperactivity, spending money profusely with extremely poor judgment, suffering from extreme loss of appetite, issuing checks without sufficient funds, defaulting on a loan, experiencing frequent mood swings, uncontrollable tiredness, falling asleep without warning in the middle of an activity. If yes, please explain.

No

65. Do you currently have a physical or mental impairment which in any way limits your ability or fitness to properly exercise your duties as a member of the Judiciary in a competent and professional manner? If yes please explain the limitation or impairment and any treatment, program or counseling sought or prescribed.

**No**

**66.** During the last ten years, have you ever been declared legally incompetent or have you or your property been placed under any guardianship, conservatorship or committee? If yes, provide full details as to court, date, and circumstances.

**No**

**67.** During the last ten years, have you unlawfully used controlled substances, narcotic drugs, or dangerous drugs as defined by Federal or State laws? If your answer is "Yes," explain in detail. (Unlawful use includes the use of one or more drugs and/or the unlawful possession or distribution of drugs. It does not include the use of drugs taken under supervision of a licensed health care professional or other uses authorized by Federal or State law provisions.)

**No**

**68.** In the past ten years, have you ever been reprimanded, demoted, disciplined, placed on probation, suspended, cautioned, or terminated by an employer as result of your alleged consumption of alcohol, prescription drugs, or illegal drugs? If so, please state the circumstances under which such action was taken, the name(s) of any persons who took such action, and the background and resolution of such action

**No**

**69.** Have you ever refused to submit to a test to determine whether you had consumed and/or were under the influence of alcohol or drugs? If so, please state the date you were requested to submit to such a test, the type of test required, the name of the entity requesting that you submit to the test, the outcome of your refusal, and the reason why you refused to submit to such a test.

**No**

**70.** In the past ten years, have you suffered memory loss or impaired judgment for any reason? If so, please explain in full.

**No**

#### **SUPPLEMENTAL INFORMATION**

**71.** Describe any additional education or experiences you have which could assist you in holding judicial office.

**The experience I gathered working in the greater Washington, D.C. area, is a tremendous asset which is not easily duplicated. I have garnered experience from the most minor activity (while serving the late U.S. Representative Tillie K. Fowler), to writing memorandum on complex Federal policy issues (as a Congressional Staffer and Senior Intern). Coupled with my Capitol Hill experience, I have also gathered experience with a private corporation engaged in the Defense Contracting industry. In that role I obtained a U.S. Department of Defense "Secret" Security Clearance for my occupation in Defense Contracting.**

**I earned a Masters Degree in Political Science from The University of Alabama in Tuscaloosa, Alabama. This intensive two year program (which I completed in 18 months) has assisted me in my practice of law.**

**I believe it is important to start at the bottom and work your way up; and that is what I have done. I also believe that in order to lead you must first serve; I also have accomplished this. No applicant is perfect. However, I strongly believe my abundant Courtroom skills, jury trial experience and varied legal and real-life experiences will augment the efficient and thorough administration of Justice in the Courts of the Seventh Judicial Circuit.**

- 72. Explain the particular contribution you believe your selection would bring to this position and provide any additional information you feel would be helpful to the Commission and Governor in evaluating your application.**

**I cannot diminish over 24 years of experience as an Assistant State Attorney serving the citizens and taxpayers of the State of Florida. In addition to nearly daily Court litigation, I have tried 100 cases through verdict and sentencing, as primary or secondary counsel. This would aid me greatly if I am honored to be appointed to the Bench. Moreover, I have maintained the highest levels of professionalism with defense counsel at all times. I am fully able and promise to follow the law. I would maintain order and professionalism while allowing for Victims and pertinent voices to be heard.**

**I also served for two years, as a Special Assistant United States Attorney (SAUSA) in the Project Guardian initiative. I was one of twelve State or local prosecutors in the entire United States assigned to the Department of Justice, United States Attorneys Office, to assist in investigating and prosecuting gun crime under Project Guardian.**

**Also, I take extremely seriously that professionalism should be exhibited by every attorney and member of the Bench. In short, I share the belief that nothing less than utmost professionalism should be practiced or tolerated. I carry myself in this manner and would bring this practice to the Bench. Evidence hereof is further demonstrated by my References, hereafter.**

**Also, having been born, raised and spending much of my adult life in Northeast and North Central Florida, I am very aware of the special complexities and needs of our growing community. I would bring this knowledge and experience to the Bench. Moreover, during**

**my time in legal practice, I have communicated and interacted with a variety of persons from various backgrounds and stations in life. I am able to communicate effectively, and offer respect, to persons of varied backgrounds. I believe this is an important part of being an effective Judge. Lastly, I believe our community would be well served by my diverse background and having a competent, thorough and pragmatic Judge with a diverse background and heritage all the while being a patriotic American. I would bring the aforementioned attributes to the Bench, along with hard work, experience and professionalism.**

## **REFERENCES**

- 73. List the names, addresses, e-mail addresses and telephone numbers of ten persons who are in a position to comment on your qualifications for a judicial position and of whom inquiry may be made by the Commission and the Governor.**

**Representative Samuel P. Garrison, Esq., Bradley, Garrison & Komando, P.A., 1279 Kingsley Avenue, Suite 118, Orange Park, FL, 32073**

**Patrick J. Kilbane, Jr., Esq., Ullman Wealth Partners, 1540 The Greens Way, Jacksonville Beach, FL, 32250**

**Jeremiah Blocker, Esq., North Florida Lawyers, PLLC, 309 Kingsley Lake Drive, Suite 904, Saint Augustine, FL, 32092**

**Richard C. Komando, Esq., Bradley, Garrison & Komando, P.A., 1279 Kingsley Avenue, Suite 118, Orange Park, FL, 32073**

**Melissa W. Nelson, Esq., State Attorney, Fourth Judicial Circuit of Florida, 220 East Bay Street, Jacksonville, FL, 32202**

**Frank M. Talbot, II, U.S. Attorneys Office, Middle District of Florida, 300 North Hogan Street, Jacksonville, FL, 32202**

**Bryan L. Shorstein, Esq., Executive Director, State Attorney's Office, Seventh Judicial Circuit of Florida, 251 North Ridgewood Avenue, Daytona Beach, FL, 32114**

**Mark Caliel, Esq., Chief Assistant State Attorney, Fourth Judicial Circuit of Florida, 220 East Bay Street, Jacksonville, FL, 32202**

**Honorable Gary P. Flower, County Judge, Duval County Courthouse, 501 West Adams Street, Jacksonville, FL, 32202**

**Honorable Steven B. Whittington, Circuit Court Judge, Clay County Courthouse, P.O.  
Drawer 1018, Green Cove Springs, FL, 32043**

**CERTIFICATE**

I have read the foregoing questions carefully and have answered them truthfully, fully and completely. I hereby waive notice by and authorize The Florida Bar or any of its committees, educational and other institutions, the Judicial Qualifications Commission, the Florida Board of Bar Examiners or any judicial or professional disciplinary or supervisory body or commission, any references furnished by me, employers, business and professional associates, all governmental agencies and instrumentalities and all consumer and credit reporting agencies to release to the respective Judicial Nominating Commission and Office of the Governor any information, files, records or credit reports requested by the commission in connection with any consideration of me as possible nominee for appointment to judicial office. Information relating to any Florida Bar disciplinary proceedings is to be made available in accordance with Rule 3-7.1(1), Rules Regulating The Florida Bar. I recognize and agree that, pursuant to the Florida Constitution and the Uniform Rules of this commission, the contents of this questionnaire and other information received from or concerning me, and all interviews and proceedings of the commission, except for deliberations by the commission, shall be open to the public.

Further, I stipulate I have read and understand the requirements of the Florida Code of Judicial Conduct.

Dated this 15 day of September, 2025.

Cyrus Patrick Zomorodian

Printed Name

(REDACTED)

Signature

State of Florida

County of \_\_\_\_\_

Sworn to (or affirmed) and subscribed before me by means of

physical presence OR  online notarization

this \_\_\_ day of \_\_\_\_\_, 20\_\_.

By \_\_\_\_\_

Personally known \_\_\_\_\_

Produced ID \_\_\_\_\_

Type of Identification \_\_\_\_\_

\_\_\_\_\_  
Signature Notary Public

\_\_\_\_\_

Printed name of Notary Public

*(Pursuant to Section 119.071(4)(d)(1), F.S.), . . . The home addresses and telephone numbers of justices of the Supreme Court, district court of appeal judges, circuit court judges, and county court judges; the home addresses, telephone numbers, and places of employment of the spouses and children of justices and judges; and the names and locations of schools and day care facilities attended by the children of justices and judges are exempt from the provisions of subsection (1), dealing with public records.*

## FINANCIAL HISTORY

1. State the amount of gross income you have earned, or losses you have incurred (before deducting expenses and taxes) from the practice of law for the preceding three-year period. This income figure should be stated on a year to year basis and include year to date information, and salary, if the nature of your employment is in a legal field.

**Current Year-To-Date:**

**Last Three Years:** \_ \_\_\_\_\_ \_

2. State the amount of net income you have earned, or losses you have incurred (after deducting expenses but not taxes) from the practice of law for the preceding three-year period. This income figure should be stated on a year to year basis and include year to date information, and salary, if the nature of your employment is in a legal field.

**Current Year-To-Date:**

**Last Three Years:** \_ \_\_\_\_\_ \_

3. State the gross amount of income or losses incurred (before deducting expenses or taxes) you have earned in the preceding three years on a year by year basis from all sources other than the practice of law, and generally describe the source of such income or losses.

**Current Year-To-Date:**

**Last Three Years:** \_\_\_\_\_ 0, 0, 0 \_\_\_\_\_  
\_\_\_\_\_

4. State the amount you have earned in the preceding three years on a year by year basis from all sources other than the practice of law, and generally describe the source of such income or losses.

**Current Year-To-Date:** \_\_\_\_\_ 0 \_\_\_\_\_

**Last Three Years:** \_\_\_\_\_ 0, 0, 0 \_\_\_\_\_  
\_\_\_\_\_

5. State the amount of net income you have earned or losses incurred (after deducting expenses) from all sources other than the practice of law for the preceding three-year period on a year by year basis, and generally describe the sources of such income or losses.

**Current Year-To-Date:** \_\_\_\_\_ 0 \_\_\_\_\_

**Last Three Years:** \_\_\_\_\_ 0, 0, 0 \_\_\_\_\_  
\_\_\_\_\_



**FORM 6  
FULL AND PUBLIC  
DISCLOSURE OF  
FINANCIAL INTEREST**

**PART A – NET WORTH**

Please enter the value of your net worth as of December 31 or a more current date. [Note: Net worth is not calculated by subtracting your *reported* liabilities from your *reported* assets, so please see the instructions on page 3.]

My net worth as of September, 2025 was \$ \_\_\_\_.

**PART B - ASSETS**

**HOUSEHOLD GOODS AND PERSONAL EFFECTS:**

Household goods and personal effects may be reported in a lump sum if their aggregate value exceeds \$1,000. This category includes any of the following, if not held for investment purposes; jewelry; collections of stamps, guns, and numismatic items; art objects; household equipment and furnishings; clothing; other household items; and vehicles for personal use.

The aggregate value of my household goods and personal effects (described above) is \$ \_\_\_\_\_

**ASSETS INDIVIDUALLY VALUED AT OVER \$1,000:**

DESCRIPTION OF ASSET (specific description is required – see instructions p. 3)

VALUE OF ASSET

DESCRIPTION OF ASSET (specific description is required – see instructions p. 3)	VALUE OF ASSET
	\$750,000
	\$9,500
	\$50,500

**PART C - LIABILITIES**

LIABILITIES IN EXCESS OF \$1,000 (See instructions on page 4):

NAME AND ADDRESS OF CREDITOR

AMOUNT OF LIABILITY

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY
	\$283,000

JOINT AND SEVERAL LIABILITIES NOT REPORTED ABOVE:

NAME AND ADDRESS OF CREDITOR

AMOUNT OF LIABILITY

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY

**PART D - INCOME**

You may ***EITHER*** (1) file a complete copy of your latest federal income tax return, *including all W2's, schedules, and attachments*, ***OR*** (2) file a sworn statement identifying each separate source and amount of income which exceeds \$1,000 including secondary sources of income, by completing the remainder of Part D, below.

I elect to file a copy of my latest federal income tax return and all W2's, schedules, and attachments.  
 (if you check this box and attach a copy of your latest tax return, you need not complete the remainder of Part D.)

**PRIMARY SOURCE OF INCOME (See instructions on page 5):**

NAME OF SOURCE OF INCOME EXCEEDING \$1,000	ADDRESS OF SOURCE OF INCOME	AMOUNT
State of Florida	311 West Monroe Street, Jacksonville, FL, 32202	\$131,272

**SECONDARY SOURCES OF INCOME** [Major customers, clients, etc., of businesses owned by reporting person—see instructions on page 6]

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS' INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE

**PART E – INTERESTS IN SPECIFIC BUSINESS [Instructions on page 7]**

	BUSINESS ENTITY #1	BUSINESS ENTITY #2	BUSINESS ENTITY #3
NAME OF BUSINESS ENTITY			
ADDRESS OF BUSINESS ENTITY			
PRINCIPAL BUSINESS ACTIVITY			
POSITION HELD WITH ENTITY			
I OWN MORE THAN A 5% INTEREST IN THE BUSINESS			
NATURE OF MY OWNERSHIP INTEREST			

**IF ANY OF PARTS A THROUGH E ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE**

**OATH**

I, the person whose name appears at the beginning of this form, do depose on oath or affirmation and say that the information disclosed on this form and any attachments hereto is true, accurate, and complete.

*(REDACTED)*

**SIGNATURE**

**STATE OF FLORIDA**

**COUNTY OF \_\_\_\_\_**

Sworn to (or affirmed) and subscribed before me this 15 day of September, 2025 by \_\_\_\_\_

(Signature of Notary Public—State of Florida)

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

Personally Known \_\_\_\_\_ OR Produced Identification \_\_\_\_\_

Type of Identification Produced \_\_\_\_\_

## INSTRUCTIONS FOR COMPLETING FORM 6:

**PUBLIC RECORD:** The disclosure form and everything attached to it is a public record. Your Social Security Number is not required and you should redact it from any documents you file. If you are an active or former officer or employee listed in Section 119.071(4)(d), F.S., whose home address is exempt from disclosure, the Commission is required to maintain the confidentiality of your home address if you submit a written request for confidentiality.

### PART A – NET WORTH

Report your net worth as of December 31 or a more current date, and list that date. This should be the same date used to value your assets and liabilities. In order to determine your net worth, you will need to total the value of all your assets and subtract the amount of all of your liabilities. Simply subtracting the liabilities reported in Part C from the assets reported in Part B will not result in an accurate net worth figure in most cases.

To total the value of your assets, add:

- form;
- (1) The aggregate value of household goods and personal effects, as reported in Part B of this form;
  - (2) The value of all assets worth over \$1,000, as reported in Part B; and
  - (3) The total value of any assets worth less than \$1,000 that were not reported or included in the category of “household goods and personal effects.”

To total the amount of your liabilities, add:

- (1) The total amount of each liability you reported in Part C of this form, except for any amounts listed in the “joint and several liabilities not reported above” portion; and,
- (2) The total amount of unreported liabilities (including those under \$1,000, credit card and retail installment accounts, and taxes owed).

### PART B – ASSETS WORTH MORE THAN \$1,000

#### HOUSEHOLD GOODS AND PERSONAL EFFECTS:

The value of your household goods and personal effects may be aggregated and reported as a lump sum, if their aggregate value exceeds \$1,000. The types of assets that can be reported in this manner are described on the form.

#### ASSETS INDIVIDUALLY VALUED AT MORE THAN \$1,000:

Provide a description of each asset you had on the reporting date chosen for your net worth (Part A), that was worth more than \$1,000 and that is not included as household goods and personal effects, and list its value. Assets include: interests in real property; tangible and intangible personal property, such as cash, stocks, bonds, certificates of deposit, interests in partnerships, beneficial interest in a trust, promissory notes owed to you, accounts received by you, bank accounts, assets held in IRAs, Deferred Retirement Option Accounts, and Florida Prepaid College Plan accounts. You are not required to disclose assets owned solely by your spouse.

#### How to Identify or Describe the Asset:

— Real property: Identify by providing the street address of the property. If the property has no street address, identify by describing the property’s location in a manner sufficient to enable a member of the public to ascertain its location without resorting to any other source of information.

— Intangible property: Identify the type of property and the business entity or person to which or to whom it relates. Do not list simply “stocks and bonds” or “bank accounts.” For example, list “Stock (Williams Construction Co.),” “Bonds (Southern Water and Gas),” “Bank accounts(First

National Bank),” “Smith family trust,” Promissory note and mortgage (owed by John and Jane Doe).”

#### **How to Value Assets:**

- Value each asset by its fair market value on the date used in Part A for your net worth.
- Jointly held assets: If you hold real or personal property jointly with another person, your interest equals your legal percentage of ownership in the property. However, assets that are held as tenants by the entirety or jointly with right of survivorship must be reported at 100% of their value.
- Partnerships: You are deemed to own an interest in a partnership which corresponds to your interest in the equity of that partnership.
- Trusts: You are deemed to own an interest in a trust which corresponds to your percentage interest in the trust corpus.
- Real property may be valued at its market value for tax purposes, unless a more accurate appraisal of its fair market value is available.
- Marketable securities which are widely traded and whose prices are generally available should be valued based upon the closing price on the valuation date.
- Accounts, notes, and loans receivable: Value at fair market value, which generally is the amount you reasonably expect to collect.
- Closely-held businesses: Use any method of valuation which in your judgment most closely approximates fair market value, such as book value, reproduction value, liquidation value, capitalized earnings value, capitalized cash flow value, or value established by “buy-out” agreements. It is suggested that the method of valuation chosen be indicated in a footnote on the form.
- Life insurance: Use cash surrender value less loans against the policy, plus accumulated dividends.

### **PART C—LIABILITIES**

#### **LIABILITIES IN EXCESS OF \$1,000:**

List the name and address of each creditor to whom you were indebted on the reporting date chosen for your net worth (Part A) in an amount that exceeded \$1,000 and list the amount of the liability. Liabilities include: accounts payable; notes payable; interest payable; debts or obligations to governmental entities other than taxes (except when the taxes have been reduced to a judgment); and judgments against you. You are not required to disclose liabilities owned *solely* by your spouse.

You do not have to list on the form any of the following: credit card and retail installment accounts, taxes owed unless the taxes have been reduced to a judgment), indebtedness on a life insurance policy owned to the company of issuance, or contingent liabilities. A “contingent liability” is one that will become an actual liability only when one or more future events occur or fail to occur, such as where you are liable only as a partner (without personal liability) for partnership debts, or where you are liable only as a guarantor, surety, or endorser on a promissory note. If you are a “co-maker” on a note and have signed as being jointly liable or jointly and severally liable, then this is not a contingent liability.

#### **How to Determine the Amount of a Liability:**

- Generally, the amount of the liability is the face amount of the debt.
- If you are the only person obligated to satisfy a liability, 100% of the liability should be listed.
- If you are jointly and severally liable with another person or entity, which often is the case where more than one person is liable on a promissory note, you should report here only the portion of the liability that corresponds to your percentage of liability. *However*, if you are jointly and severally liable for a debt relating to property you own with one or more others as tenants by the entirety or jointly, with right of survivorship,

report 100% of the total amount owed.

— If you are only jointly (not jointly and severally) liable with another person or entity, your share of the liability should be determined in the same way as you determined your share of jointly held assets.

**Examples:**

— You owe \$10,000 to a bank for student loans, \$5,000 for credit card debts, and \$60,000 with your spouse to a saving and loan for the mortgage on the home you own with your spouse. You must report the name and address of the bank (\$10,000 being the amount of that liability) and the name and address of the savings and loan (\$60,000 being the amount of this liability). The credit cards debts need not be reported.

— You and your 50% business partner have a \$100,000 business loan from a bank and you both are jointly and severally liable. Report the name and address of the bank and \$50,000 as the amount of the liability. If your liability for the loan is only as a partner, without personal liability, then the loan would be a contingent liability.

**JOINT AND SEVERAL LIABILITIES NOT REPORTED ABOVE:**

List in this part of the form the amount of each debt, for which you were jointly and severally liable, that is not reported in the “Liabilities in Excess of \$1,000” part of the form. Example: You and your 50% business partner have a \$100,000 business loan from a bank and you both are jointly and severally liable. Report the name and address of the bank and \$50,000 as the amount of the liability, as you reported the other 50% of the debt earlier.

**PART D – INCOME**

As noted on the form, you have the option of either filing a copy of your latest federal income tax return, including all schedules, W2's and attachments, with Form 6, or completing Part D of the form. If you do not attach your tax return, you must complete Part D.

**PRIMARY SOURCES OF INCOME:**

List the name of each source of income that provided you with more than \$1,000 of income during the year, the address of that source, and the amount of income received from that source. The income of your spouse need not be disclosed; however, if there is a joint income to you and your spouse from property you own jointly (such as interest or dividends from a bank account or stocks), you should include all of that income.

“Income” means the same as “gross income” for federal income tax purposes, even if the income is not actually taxable, such as interest on tax-free bonds. Examples of income include: compensation for services, gross income from business, gains from property dealings, interest, rents, dividends, pensions, IRA distributions, distributive share of partnership gross income, and alimony, but not child support. Where income is derived from a business activity you should report that income to you, as calculated for income tax purposes, rather than the income to the business.

**Examples:**

— If you owned stock in and were employed by a corporation and received more than \$1,000 of income (salary, commissions, dividends, etc.) from the company, you should list the name of the company, its address, and the total amount of income received from it.

— If you were a partner in a law firm and your distributive share of partnership gross income exceeded \$1,000, you should list the name of the firm, its address, and the amount of your distributive share.

— If you received dividend or interest income from investments in stocks and bonds, list only each individual company from which you received more than \$1,000. Do not aggregate income from all of these investments.

— If more than \$1,000 of income was gained from the sale of property, then you should list as a source of income the name of the purchaser, the purchaser's address, and the amount of gain from the sale. If the purchaser's

identity is unknown, such as where securities listed on an exchange are sold through a brokerage firm, the source of income should be listed simply as “sale of (name of company) stock,” for example.

— If more than \$1,000 of your income was in the form of interest from one particular financial institution (aggregating interest from all CD’s, accounts, etc., at that institution), list the name of the institution, its address, and the amount of income from that institution.

**SECONDARY SOURCE OF INCOME:**

This part is intended to require the disclosure of major customers, clients, and other sources of income to businesses in which you own an interest. It is not for reporting income from second jobs. That kind of income should be reported as a “Primary Source of Income.” You will *not* have anything to report *unless*:

- (1) You owned (either directly or indirectly in the form of an equitable or beneficial interest) during the disclosure period, more than 5% of the total assets or capital stock of a business entity (a corporation, partnership, limited partnership, LLC, proprietorship, joint venture, trust, firm, etc., doing business in Florida); and
- (2) You received more than \$1,000 in gross income from that business entity during the period.

If your ownership and gross income exceeded the two thresholds listed above, then for that business entity you must list every source of income to the business entity which exceeded 10% of the business entity’s gross income (computed on the basis of the business entity’s more recently completed fiscal year), the source’s address, the source’s principal business activity, and the name of the business entity in which you owned an interest. You do not have to list the amount of income the business derived from that major source of income.

**Examples:**

- You are the sole proprietor of a dry cleaning business, from which you received more than \$1,000 in gross income last year. If only one customer, a uniform rental company, provided more than 10% of your dry cleaning business, you must list the name of your business, the name of the uniform rental company, its address, and its principal business activity (uniform rentals).
- You are a 20% partner in a partnership that owns a shopping mall and your gross partnership income exceeded \$1,000. You should list the name of the partnership, the name of each tenant of the mall that provided more than 10% of the partnership’s gross income, the tenant’s address and principal business activity.

**PART E – INTERESTS IN SPECIFIED BUSINESS**

The types of businesses covered in this section include: state and federally chartered banks; state and federal savings and loan associations; cemetery companies; insurance companies; mortgage companies, credit unions; small loan companies; alcoholic beverage licensees; pari-mutuel wagering companies; utility companies; and entities controlled by the Public Service Commission; and entities granted a franchise to operate by either a city or a county government.

You are required to make this disclosure if you own or owned (either directly or indirectly in the form of an equitable or beneficial interest) at any time during the disclosure period, more than 5% of the total assets or capital stock of one of the types of business entities listed above. You also must complete this part of the form for each of these types of business for which you are, or were at any time during the year an officer, director, partner, proprietor, or agent (other than a resident agent solely for service of process).

If you have or held such a position or ownership interest in one of these types of businesses, list: the name of the business, its address and principal business activity, and the position held with the business (if any). Also, if you own(ed) more than a 5% interest in the business, as described above, you must indicate that fact and describe the nature of your interest.

## JUDICIAL APPLICATION DATA RECORD

The judicial application shall include a separate page asking applicants to identify their race, ethnicity and gender. Completion of this page shall be optional, and the page shall include an explanation that the information is requested for data collection purposes in order to assess and promote diversity in the judiciary. The chair of the Commission shall forward all such completed pages, along with the names of the nominees to the JNC Coordinator in the Governor's Office (pursuant to JNC Uniform Rule of Procedure).

(Please Type or Print)

Date: September 15, 2025

JNC Submitting To: Seventh Judicial Circuit of Florida

Name (please print): \_\_\_\_\_

Current Occupation: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Attorney No.: \_\_\_\_\_

Gender (check one):  Male  Female

Ethnic Origin (check one):  White, non-Hispanic

Hispanic

Black

American Indian/Alaskan Native

Asian/Pacific Islander

County of Residence: Saint Johns

*FLORIDA DEPARTMENT OF LAW ENFORCEMENT*

DISCLOSURE PURSUANT TO THE  
FAIR CREDIT REPORTING ACT (FCRA)

The Florida Department of Law Enforcement (FDLE) may obtain one or more consumer reports, including but not limited to credit reports, about you, for employment purposes as defined by the Fair Credit Reporting Act, including for determinations related to initial employment, reassignment, promotion, or other employment-related actions.

CONSUMER'S AUTHORIZATION FOR  
FDLE TO OBTAIN CONSUMER REPORT(S)

I have read and understand the above Disclosure. I authorize the Florida Department of Law Enforcement (FDLE) to obtain one or more consumer reports on me, for employment purposes, as described in the above Disclosure.

Cyrus Patrick Zomorodian  
Printed Name of Applicant

Signature of Applicant (REDACTED)

Date: September 15, 2025

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 3:20-cr-72-TJC-MCR

EVONTE EARL GLOVER

**UNITED STATES' MOTION FOR SENTENCING GUIDELINES  
DEPARTURE AND STATUTORY VARIANCE**

The United States of America, by Karin Hoppmann, Acting United States Attorney for the Middle District of Florida, and pursuant to USSG § 4A1.3(a) and 18 U.S.C. § 3553(e), hereby moves this Court to depart upward from the sentencing guidelines, and further states:

**I. Procedural Posture and Underlying Investigation**

On May 12, 2021, the defendant appeared before United States Magistrate Judge Monte C. Richardson and pleaded guilty to Count One of the indictment without a written plea agreement.

On May 17, 2021, Chief United States District Judge Timothy J. Corrigan accepted the defendant's guilty pleas and adjudicated him guilty of those offenses.

On November 10, 2019, officers with the Jacksonville Sheriff's Office (JSO) responded to a search for a vehicle involved in a shooting. JSO ultimately located the vehicle, a stolen white Honda CRV, in the driveway of 1262 Delmar Street, Jacksonville, Florida.

Upon making contact, officers observed Evonte Earl Glover being helped out of the backseat of the Honda CRV by a female, later identified as Glover's girlfriend, Samantha Murray, who had been summoned via cellphone to come and assist Glover. Glover was suffering from several gunshot wounds.

Fire Rescue personnel responded and while they were treating Glover, a firefighter located a 22-round capacity extended Glock .40 caliber magazine loaded with 15 rounds of ammunition in Glover's left front pocket. The ammunition was later determined to have been manufactured outside of Florida.

A witness advised a JSO officer that he had seen another black male run from the area and throw a silver object. JSO officers conducted a search of the area and located Terry Lavon Shuman, who was in possession of the keys to the Honda CRV. JSO utilized a canine officer to conduct an article search of the area and located a silver and black handgun laying on the ground inside a dry storm drain which was in the path of Shuman's flight. The firearm was identified as a Smith and Wesson, 9mm pistol, equipped with a 15-round capacity magazine that had 10 rounds of ammunition in the magazine and one round of ammunition in the chamber. DNA recovered from the pistol and the magazine matched Shuman's DNA. The pistol was later determined to have been manufactured outside the State of Florida.

Officers also responded to a secondary scene at 5021 Quan Drive where they found the body of J. M., who was killed from multiple gunshots was found with a Taurus, .40 caliber pistol, in his hand. JSO officers located, among other things, debris from the Honda CRV, numerous shell casings, and a Glock, .40 caliber pistol. The Glock pistol had an empty magazine inserted. The Glock pistol, Smith and Wesson pistol, Taurus pistol, and the shell casings recovered from the scene were sent to the Florida Department of Law Enforcement laboratory. The laboratory determined that 15 of the casings were fired from the Glock pistol, 3 of the casings were fired from the Smith and Wesson pistol, and 11 of the casings were fired from the Taurus pistol. The Glock pistol recovered from the scene was the same make and caliber as the Glock, .40 caliber magazine located in Glover's pocket. The Glock pistol was also manufactured outside the State of Florida.

Officers obtained area surveillance footage, which showed a white Honda CRV had arrived at Quan Avenue, two males exited the Honda CRV, an exchange of gunfire occurred between the two males and J.M., and then the Honda CRV immediately fled the area. The Glock pistol was recovered in the immediate vicinity of where the Honda CRV fled from. Cell site data from Glover's cellphone linked the phone to both crime scene locations.

Shuman and Glover both declined to make any statements to investigators. Prior to November 2019, Glover and Shuman knew they had been convicted of multiple felony offenses, including those outlined in Counts One and Two of the Indictment.

Mr. Glover's sentencing hearing on August 31, 2021, will mark another in a long line of court appearances for the defendant. Since the age of 15 the defendant has repeatedly committed crimes, which resulted in his being incarcerated in county jail, state prison, or under court ordered supervision for a large portion of his life.

Yet, none of these sanctions deterred him from continuing to commit further crimes. As he comes to court for sentencing at age 29, his prior conduct demonstrates a fundamental lack of respect for the rule of law and a complete disregard for the impact that his crimes have on society. The Court can and should depart upward from the sentencing guidelines, pursuant to USSG § 4A1.3(a), because “the defendant’s criminal history category or the likelihood that the defendant will commit other crimes. In addition, and independent from the guideline departure, the Court should vary from the guidelines, pursuant to 18 U.S.C. § 3553(a), because a sentence above the advisory guidelines range is necessary to take into account “the history and characteristics of the defendant,” “to promote respect for the law,” “to provide just punishment for the offense,” “to afford adequate deterrence to criminal conduct,” and particularly, “to protect the public from further crimes of the defendant.” For the reasons set forth below, these factors warrant a sentence of 10 years’ imprisonment.

## **II. The Defendant’s History of Violence and Drugs**

### *A. State Court Convictions*

The defendant has been convicted of violent or drug crimes on three separate and distinct instances in state court. In 2010, he was charged with home invasion robbery with firearm or other deadly weapon in Case No. 2009CF1564, Clay County, in the Fourth Judicial Circuit Court of Florida. He was direct filed as an

adult, pled guilty and was sentenced on October 14, 2020, to 4 years prison followed by 2 years community control. He was released from prison on June 24, 2013. The Defendant violated community control on February 14, 2014. On April 15, 2014, community control was revoked and the defendant was sentenced to six years prison with credit of four years and fifty-six days. In the underlying robbery, the defendant and two co-defendants forced entry into an apartment and robbed two victims at gunpoint. The defendant and co-defendants stole cash, jewelry, cell phones and a gaming system. This crime was committed by the Defendant while he was on juvenile probation in three separate cases.

In 2014, the defendant was charged with possession of cocaine, resisting officer without violence, criminal mischief and driving while license suspended in Case No. 2014CF698, Duval County, in the Fourth Judicial Circuit Court of Florida. He pled guilty and was sentenced on March 25, 2014, to twelve months jail, six months probation on count one and 28 days jail on the remaining counts. A violation of probation was issued on September 25, 2015. On April 28, 2017, the defendant was arrested on the violation of probation. On June 19, 2017, probation was revoked, and the defendant was sentenced to twenty months prison with credit for twelve months. In this case, subsequent to a lawful traffic stop where the defendant was a passenger, the defendant attempted to walk away from the scene. However, upon a patdown of the defendant by law enforcement the officer felt what appeared to be a gun in the defendant's pocket. The defendant pushed the officer away, engaged the officer in a struggle and fled on foot before being apprehended

hiding in a backyard. Crack cocaine fell from the defendant's pocket while fleeing from the police. Post *Miranda*, the Defendant stated he did not have a gun and the crack cocaine was not his. The Defendant violated probation for his arrest on September 11, 2015, for sale, manufacture, deliver cocaine, and resisting or obstructing officer without violence.

In 2015, the defendant was charged with sale, manufacture, deliver cocaine, and resisting or obstructing officer without violence in Case No. 2015CF1255, Clay County, in the Fourth Judicial Circuit Court of Florida. He pled guilty and was sentenced on November 3, 2015 to 23 months of imprisonment on count one and concurrent 54 days jail on count two. He was released from prison on December 1, 2017. In this case the defendant sold crack cocaine to a confidential informant for \$50. When officers attempted to arrest the defendant in the hotel room, he jumped backwards into the window which caused it to shatter.

### **III. Argument and Memorandum of Law**

The defendant—by his most recent conduct, as well as his conduct spanning a significant portion of his adult life—has demonstrated that incarceration will not deter him from committing crime. He has shown, time and time again, that no restriction on his liberty has any deterrent effect whatsoever. In the present case, the one count of possession of a firearm or ammunition by a convicted felon carries a maximum of a 10 year term of imprisonment. A violation of supervised release carries a maximum sentence of 2 years imprisonment.

The government submits that a sentence of, or near, the statutory maximum of 10 years in this case would be reasonable and supported by a review of the defendant's history of unrelenting criminal conduct.

Section 4A1.3(a)(1) of the Sentencing Guidelines authorizes an upward departure "[i]f reliable information indicates that the defendant's criminal history category substantially underrepresents the seriousness of the defendant's criminal history or the likelihood that the defendant will commit other crimes, an upward departure may be warranted." At age 29, the defendant has 3 prior felony convictions and a criminal history score of 23 which establishes him as criminal history category V. The number of felony convictions, the similarity of his prior convictions, and the continuous nature of his criminal behavior over the years demonstrates the seriousness of the defendant's criminal history and the strong likelihood that the defendant will continue to harm the public by committing future crimes.

In addition to an upward departure under the guidelines—and for the same reason—an upward variance under 18 U.S.C § 3553(a) is also warranted. A much greater sentence than the one recommended by the guidelines is necessary to take into account "the history and characteristics of the defendant." See 18 U.S.C. § 3553(a)(1) & (a)(2); *United States v. Italiano*, 436 F. App'x 958, 959-60 (11th Cir. 2011) (affirming an upward variance from the advisory guideline range involving a supervised release scenario based on a District Court's determination that the sentence reflected the seriousness of the crimes and in order to protect the public

from further crimes of the defendant based on the defendant's history and characteristics to include similar previous convictions and the District Court's determination that the defendant would likely engage in similar fraudulent acts in the future.) A greater sentence is needed "to promote respect for the law," See 18 U.S.C. § 3553(a)(1) & (a)(2). *United States v. Norman*, No. 08-TP-80004CR, 2009 WL 464078, at \*3 (S.D. Fla. Feb. 24, 2009) (finding in a detention context involving supervised release that allegations of violating the law by committing acts similar to those from the underlying conviction for which he is serving supervised release demonstrate defendant's fundamental lack of respect for the rule of law) The defendant continues to show a lack of respect for the law as evidenced by him ongoing criminal conduct while on court supervision. A greater sentence is needed "to provide just punishment for the offense," See 18 U.S.C. § 3553(a)(1) & (a)(2); *United States v. Love*, 491 F. App'x 12, 14 (11th Cir. 2012) (affirming an upward variance based on the District Court noting the defendant's extensive history of fraud, identity theft, and theft charges, and making a determination that a significant upward variance was necessary to deter him from future crimes and to protect the public from those future crimes) A greater sentence is needed "to afford adequate deterrence to criminal conduct," *United States v. Pugh*, 482 F. App'x 516, 517 (11th Cir. 2012) (affirming an upward departure based on a finding by the District Court of a pattern of continuing and escalating criminal conduct and past convictions for similar offenses); *United States v. Seymore*, 530 F. App'x 850, 852 (11th Cir. 2013) (holding that District Court's guideline sentence of 78 months was reasonable given

that the defendant's previous sentence of 60 months was insufficient to deter him from committing future drug offenses); *United States v. Martin*, 455 F.3d 1227, 1240 (11th Cir. 2006) (vacating a District Court sentence that "utterly fail[ed] to afford adequate deterrence to criminal conduct. A greater sentence is needed in order to "protect the public from further crimes of the defendant." See 18 U.S.C. § 3553(a)(1) & (a)(2). *United States v. Hughes*, 181 F. App'x 773, 775 (11th Cir. 2006) (affirming an upward variance due to repeated convictions for similar conduct and the need to protect the public from further crimes of the defendant)

Post-Booker,<sup>1</sup> the Eleventh Circuit has repeatedly upheld substantial upward variances under section 3553(a) that were justified by egregious recidivism. In United States v. Early, 686 F.3d 1219 (11th Cir. 2012), the court affirmed an upward variance to 210 months from a guidelines range of 78-97 months despite the government's recommendation of a 78-month sentence. In sentencing the defendant, the district court (Corrigan, J.) stated that "[i]t's obvious that Mr. Early, by his own conduct, has demonstrated that the public needs protecting from him, that—that he—the only way he's deterred is when he's in custody. And I think those are factors which heavily weigh in my evaluation." Id. at 1222 (quoting district court). In affirming the sentence, the Eleventh Circuit stated the following:

On this record, we do not find that the sentence imposed by the district court was substantively unreasonable. Although the upward variance was substantial, it was still well below the maximum 900 months that he could have received under the statute. See *United States v. Gonzalez*,

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<sup>1</sup>United States v. Booker, 543 U.S. 220 (2005).

550 F.3d 1319, 1324 (11th Cir. 2008) (comparison between statutory maximum and sentence imposed an indicator of reasonableness).

In addition, many of the § 3553(a) factors militate in favor of an upward variance in this case. Early has shown that, for the past 36 years, he has been unable to conform his conduct to the requirements of law. His criminal history is so extensive that he has been incarcerated virtually all of his adult life. When he is out of prison, he commits more crimes—many of them very violent. The upward variance is also supported by Early's disrespect for the law reflected in his recidivism; the need for deterrence; the need to protect society from him; and, the need to promote respect for the law.

Early, 686 F.3d 1222-23; see also United States v. Shaw, 560 F.3d 1230, 1235, 1240-41 (11th Cir. 2009) (upward variance to 120 months from guidelines range of 30-37 months; defendant had 20 criminal history points and district court "found that more punishment was needed for deterrence and to promote respect for the law. It remarked that shorter sentences had done nothing to get Shaw off his determined course of crime and had not been enough to protect the public from his lawlessness");

Like the defendant in Early, the defendant in the present case has shown that he is unable to conform his conduct to the requirement of the law. The defendant persistently commits crimes involving violence, firearms and drugs. He has been incarcerated or under court appointed supervision time and time again for similarly related crimes. While on state probation he continues to commit crimes. Simply put, the defendant has demonstrated—repeatedly—that he is incapable of refraining from engaging in criminal activity.

The defendant's persistent failure to be deterred by a more lenient sentence makes him a real threat to society. His constant disregard for the law and ongoing threat to the public has not gone unnoticed. It is evident based on his continuing criminal conduct while under state probation that the defendant's previous

incarceration did not deter him from committing further crimes and, unless incarcerated, he presents an active threat to society.

The United States asks the Court to grant this motion and on Count One and depart upward four levels under the Sentencing Guidelines to a total offense level 27, which at criminal history category VI, would result in a guidelines range of 130 – 162 months. The Court should then sentence the defendant to 120 months' imprisonment on Count One. The government requests—both pursuant to the guidelines departure and as an upward variance under 18 U.S.C. § 3553(a)—that the Court impose a sentence in this case of 120 months as outlined. Under the circumstances referenced above, a 10-year total sentence would be reasonable and justified.

WHEREFORE, the United States of America, respectfully moves this Court to grant the motion.

Date: August 20th, 2021.

Respectfully submitted,

KARIN HOPPMANN  
Acting United States Attorney

By:

s/ Cyrus P. Zomorodian

CYRUS P. ZOMORODIAN

Special Assistant United States Attorney

Florida Bar No. 0515337

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**U.S. v. Evonte Earl Glover**

**Case No. 3:20-cr-72-TJC-MCR**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

David L. Haas, Esq.

s/Cyrus P. Zomorodian  
CYRUS P. ZOMORODIAN  
Special Assistant United States Attorney

IN THE CIRCUIT COURT OF THE FOURTH  
JUDICIAL CIRCUIT, IN AND FOR DUVAL  
COUNTY, FLORIDA

CASE NO. 2022-CF-008381-AXXX

DIVISION : CR-I

STATE OF FLORIDA

vs.

JOSHUA PHILIP PARKER  
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**RESPONSE TO**  
**DEFENDANT'S MOTION TO REDUCE BOND**

The State of Florida, by and through the undersigned Assistant State Attorney, pursuant to Rules 3.131(d)(2) and 3.131(d)(1)(c), Florida Rules of Criminal Procedure, and §903.046, Florida Statutes, requests this Honorable Court **deny** Defendant's Motion to Reduce Bond. In support of this Response, the State would show as follows:

1. The Defendant was arrested on August 27, 2022, for the crime of Trafficking in Fentanyl.
2. Bond was set at \$150,000.
3. On 8/27/22, officers conducted a traffic stop on the vehicle driven by witness/owner Jessica Meadows for suspended license. Defendant Parker was in the passenger seat and witness Richard Forest was sitting in the bed of the truck. Defendant Parker was in the passenger seat and was having difficulty/nervousness when retrieving his ID. Driver gave consent to search the car. In the black bag on the floorboard where Defendant Parker was sitting were multiple baggies of fentanyl (total 15.6g packaging). Officers asked who the bag belonged to and Defendant Parker claimed ownership. Defendant Parker said the substance was fentanyl. Defendant Parker was then mirandized. Post Miranda, Defendant Parker said the bag was his and he just purchased the drugs which he thought was fentanyl. Defendant Parker denied dealing drugs and said he got a large amount because he was going on a trip soon. Defendant Parker had two wallets. In a second wallet, D had \$2000 which he said was from doing a tree cutting job. Defendant Parker said he paid about \$1000 for the drugs. Both Forest and Meadows denied knowledge of the drugs.
4. Under Statute, the strength of the case (§903.046(2)(b)) and the nature and circumstances of the offense charged (§903.046(2)(a)) shall be considered by the Court in considering an appropriate bond amount.

5. Subsequent to a plea of guilty or a finding of guilt by a jury of his peers, the Defendant would be subject to up to 30 years in prison. The aforementioned is relevant as to the nature and circumstances of the offense charged. (§903.046(2)(a)).
6. The Defendant has been previously convicted of Felony Battery and six (6) Misdemeanors. The Court shall consider the Defendant's past and present conduct, including any record of convictions, previous flight to avoid prosecution, or failure to appear at Court proceedings. (§903.046(2)(d)).
7. The State has reason to believe that the source of funds used to make any bail will include money derived by or through the ill-gotten gain of the Narcotics trade. This Honorable Court shall consider the source of funds used to post bail. (§903.046(2)(f))
8. The Defendant is alleged, under Information, to have been involved in illegal drug activity. Under (§903.046(2)(h)), this Honorable Court shall consider the street value of any drug or controlled substance connected to or involved in the criminal charge. It is the finding and intent of the Legislature that crimes involving drugs and other controlled substances are of serious social concern, that the flight of defendants to avoid prosecution is of similar serious social concern, and that frequently such defendants are able to post monetary bail using the proceeds of their unlawful enterprises to defeat the social utility of pretrial bail. Therefore, the courts should carefully consider the utility and necessity of substantial bail in relation to the street value of the drugs or controlled substances involved. (§903.046(2)(h))
9. The State contends that the release of the Defendant, by and through a lowered bond, creates a probability of danger to the community due to his involvement in the toxic and dangerous illegal drug trade. (§903.046(2)(e)) Further, the Defendant has shown a prior propensity for violence as evidenced by his prior conviction for Felony Batt
10. For the aforementioned reasons, the bond as set is imminently reasonable.

**WHEREFORE**, the State respectfully requests this Honorable Court deny the Defense Motion.

Respectfully submitted,

MELISSA W. NELSON  
STATE ATTORNEY

By: \_\_\_\_\_

Cyrus Patrick Zomorodian  
Assistant State Attorney  
Florida Bar No.: 0515337

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by E-File to The Office of the Public Defender, Deana Duncan, Esq., 407 North Laura Street, Jacksonville, Florida, 32202, this 18<sup>th</sup> day of October, 2022.

MELISSA W. NELSON  
STATE ATTORNEY

By: \_\_\_\_\_

Cyrus Patrick Zomorodian  
Assistant State Attorney  
Florida Bar No.: 0515337

**Animals and the Law**  
**FL-SPEC-319**  
**Adjunct Professor Cyrus P. Zomorodian**  
**Spring 2014**  
**Wednesday / 6:00pm – 7:50pm / Room 270**

Adjunct Professor Cyrus P. Zomorodian  
Room 488 - Baypine  
CyrusZ@coj.net

**Office Hours:** I intend to be in class a few minutes early prior to each class. Also, I am generally amenable to staying after class (unless otherwise announced) to entertain questions, concerns or comments. I am more than happy to schedule a mutually convenient time, date, and place to meet for the purpose of class related discussion, as well.

**Required Reading:** Bryant, Huss & Cassuto, *Animal Law and the Courts*, Thomson West, 2008  
Articles, Caselaw & Statutes, as assigned

**Brief Class Description:** We will discuss, and learn, about the laws governing and affecting animals and society. Animals and the Law is a thought-provoking, growing and evolving area of legal study and practice. The coursework will extend into relevant associated areas of Criminal Law, Torts and Constitutional Law. Requirements for the Class include a Final Exam, Class Presentation, Required Reading and general class participation. All viewpoints are welcome and an open forum of ideas is encouraged. Further, we will explore the current state of the law regarding Animal Abuse, Fighting, Cruelty and Neglect.

**Attendance and Punctuality:** Attendance is mandatory. Students who miss more than two (2) classes will be withdrawn with a grade of "F", as governed by the attendance policies of the American Bar Association. A student who is unprepared may, in the Professor's discretion, be counted absent for said day. We will take a break approximately halfway through each Class period. Students with medical and / or physical needs should provide documentation to the Office of Student Affairs, in order to allow for reasonable accommodation.

**Prerequisites:** Completion of First Year classes.

**Food & Beverages:** Beverages which do not include alcohol are permitted in class. Food, reasonable in nature, is permitted within the discretion of the Professor. Food which may disrupt the class (loud when eaten, strong odor, etc.) will not be permitted. Gum is allowed as long as it is disposed of properly. There is no snapping, popping etc. of gum permitted in the classroom.

**Grading:**

- 50% Final Examination: The Final Examination will encompass the reading as assigned in the Textbook, Caselaw, Articles and Lecture Material.
- 30% Class Presentation: A Class Presentation must be completed and presented by each Student: Each Student should give great weight to including a PowerPoint as part of their Presentation. The topic of the Class Presentation must be drawn from a topic discussed, or to be discussed, in Animals and the Law. The length of each Presentation should be no less than 15 minutes and is limited to 20 minutes. Each Student should arrive in class on January 29, 2014, with a brief, typed explanation of the Proposed Topic for Class Presentation. The aforementioned brief in length, typed, explanation of the Proposed Topic for Class Presentation should be 3 to 5 sentences in length.
- 20% Class Participation & Preparation: Each Student is expected, and required, to read each assignment and be prepared to discuss in detail.

**Important Policies:** The provisions of the Florida Coastal School of Law Handbook, The Honor Code, and the Code of Conduct apply to this Class. The Professor may amend or supplement this Syllabus, including the reading assignments, as needed. Any such changes will be announced in class.

**Objective:** Students will become familiar with the Animal Law issues listed herein, including relevant law.

## ASSIGNMENTS

- January 15:** Syllabus overview & class framework. A Brief Introduction to Animal Law.
- January 22:** Chapter 1, Bryant
- January 29:** Chapter 2, Bryant
- February 05:** Chapter 3, Bryant
- February 12:** Chapter 4, Bryant
- February 19:** Animal Abuse, Fighting, Cruelty & Neglect in Florida; F.S. 828; Caselaw (TBA)
- February 26:** Animal Abuse, Fighting, Cruelty & Neglect in Florida; F.S. 828; Caselaw (TBA) (cont.)
- March 05:** Class Presentations
- March 12:** Class Presentations; Chapter 5, Bryant
- March 19:** *NO CLASS (FCSL Spring Break)*
- March 26:** Class Presentations; Chapter 5, Bryant (cont.)
- April 02:** Chapter 6, Bryant
- April 09:** Chapter 7, Bryant
- April 16:** Animal Law in an International Law context; Multi-State overview
- April 23:** Current events in Animal Law; Entertainment Law & Animals; Animal Liberation; Miscellaneous
- April 30:** *NO CLASS (Reading Period)*
- May 07:** FINAL EXAMINATION, Room 420, 6:00 pm – 8:00 pm

