

FORMAL REQUEST FOR INFORMATION

Regarding Detective Nathan King's Qualifications to Make Stand Your Ground Determinations

In the Matter of Steven Paul Colon (Case #22-80828)

EXECUTIVE SUMMARY

This document constitutes a formal request for information regarding Detective Nathan King's qualifications, training, and experience in making Stand Your Ground determinations. The request is submitted in connection with the investigation into the death of Steven Paul Colon on September 24, 2022.

Detective King's determination that this case qualified as "justifiable homicide" under Florida's Stand Your Ground law has been directly contradicted by the State Attorney's Office, which has acknowledged that "there has been a miscarriage of justice." This discrepancy raises serious questions about Detective King's qualifications to make such consequential legal determinations.

Stand Your Ground determinations require sophisticated legal analysis that may exceed standard law enforcement training. The premature nature of Detective King's determination, made before completing basic investigative steps, and his apparent failure to recognize clear legal disqualifiers for Stand Your Ground protection, necessitate a thorough review of his qualifications.

We respectfully request the information detailed below within 15 business days, pursuant to Florida's Public Records Law, Chapter 119, Florida Statutes.

INFORMATION REQUESTED

1. Training and Certification Records

We formally request the following records related to Detective Nathan King:

- a) Complete training records specifically related to Florida's Stand Your Ground law, including:

- Dates, duration, and providers of all Stand Your Ground training
- Course syllabi and completion certificates
- Training materials used in such courses
- Any examinations or assessments of competency in Stand Your Ground determinations

b) Documentation of SCSO policies and procedures regarding:

- Required qualifications before detectives can make Stand Your Ground determinations
- Certification or qualification standards for homicide investigators making legal determinations
- Supervisory review protocols for Stand Your Ground determinations
- Any departmental guidelines for evaluating Stand Your Ground claims

c) Records of continuing education or legal updates provided to Detective King regarding:

- Changes to Florida's Stand Your Ground law since its inception
- Relevant case law affecting Stand Your Ground interpretations
- Legal seminars or workshops attended by Detective King on this topic

2. Prior Case Experience

We request disclosure of the following information regarding Detective King's experience:

a) The number of previous homicide cases where Detective King made Stand Your Ground determinations, including:

- Case numbers and dates
- Brief summaries of the determinations made
- Outcomes of those cases, including any that were later reversed or contradicted by prosecutors

b) Internal review documentation related to Detective King's previous Stand Your Ground determinations:

- Peer review assessments
- Supervisory oversight documentation
- Any performance evaluations specifically addressing legal determination capabilities

c) Any instances where Detective King's Stand Your Ground determinations were:

- Challenged by the State Attorney's Office
- Reversed by supervisors or prosecutors

- Subject to litigation or judicial review

3. Case-Specific Decision Process

We request documentation of Detective King's decision-making process in the Steven Paul Colon case:

a) Any written analysis or memoranda prepared by Detective King explaining his Stand Your Ground determination

b) Records of consultations with:

- The State Attorney's Office
- SCSO legal counsel
- Supervisors or other detectives
- Any legal experts

c) Timeline documentation showing:

- When the Stand Your Ground determination was made
- What evidence had been collected at that time
- What evidence was still pending at that time
- Any revisions to the determination as new evidence emerged

d) Documentation of Detective King's consideration of:

- David Gregory's concealed carry permit status
- The legal significance of Gregory crossing to Steven's side of the road
- The forensic evidence contradicting claims of a close-range struggle
- Witness statements regarding prior threats made by Gregory

4. Departmental Oversight

We request information regarding the oversight of Detective King's determination:

a) Identity and qualifications of all supervisors who reviewed and approved Detective King's Stand Your Ground determination

b) Documentation of any disagreements or concerns raised by:

- Other investigators
- Supervisors
- Prosecutors
- SCSO legal counsel

c) Records of any internal review conducted after the State Attorney's Office indicated there had been a "miscarriage of justice"

d) Any corrective actions, additional training, or procedural changes implemented as a result of this case

LEGAL BASIS FOR REQUEST

This request is made pursuant to:

1. Florida's Public Records Law, Chapter 119, Florida Statutes, which provides that all state, county, and municipal records are open for personal inspection by any person.
2. The constitutional right to due process, which includes the right to meaningful review of governmental actions affecting life, liberty, or property interests.
3. The public interest in ensuring that law enforcement officers making consequential legal determinations possess adequate qualifications and training.
4. The acknowledged "miscarriage of justice" in this case by the State Attorney's Office, which creates a compelling interest in understanding how such a determination was made.

CONCLUSION

The determination that David Ross Gregory's actions qualified for Stand Your Ground protection had profound consequences for justice in the death of Steven Paul Colon. The State Attorney's Office has explicitly acknowledged a "miscarriage of justice" in this case, directly contradicting Detective King's determination.

Understanding Detective King's qualifications, training, and decision-making process is essential to addressing the serious concerns about this case and preventing similar miscarriages of justice in the future.

We appreciate your prompt attention to this request and look forward to receiving the requested information within 15 business days.

Respectfully submitted,

Steven Colon

cc: Sheriff Kurt A. Hoffman, Sarasota County Sheriff's Office State Attorney Ed Brodsky Karen Fraivillig, State Attorney's Office Florida Department of Law Enforcement, Office of Executive Investigations