

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

CASE NO.:

HEATHER TRITT, as PERSONAL  
REPRESENTATIVE OF THE ESTATE  
OF ANGELA CARR,

Plaintiff,

v.

CHRISTI MCCULLARS, ESQ., as PERSONAL  
REPRESENTATIVE OF THE ESTATE  
OF RYAN PALMETER; MARYANN  
PALMETER, individually; and STEPHEN  
PALMETER, individually,

Defendants.

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**PLAINTIFF'S COMPLAINT FOR DAMAGES**

Plaintiff, HEATHER TRITT, as Personal Representative of the ESTATE OF ANGELA CARR, hereby files this Complaint for Damages against Defendants, CHRISTI MCCULLARS, ESQ., as Personal Representative of the Estate of Ryan Palmeter, MARYANN PALMETER, and STEPHEN PALMETER, and states as follows:

## JURISDICTIONAL ALLEGATIONS

1. In substantial part, this is an action for damages more than \$50,000.00, exclusive of attorney fees, interest and costs, and Plaintiff hereby demands a trial by jury.<sup>1</sup>

2. Angela Carr was shot and killed in Jacksonville, Duval County, Florida, on August 26, 2023, by Ryan Palmeto (hereafter, "Palmeto").

3. This action is being brought pursuant to Florida's Wrongful Death Act, section 768.16 of the Florida Statutes.

4. The names of the survivors or beneficiaries of Mrs. Carr and her Estate are identified as follows:

- a. The Estate of Angela Carr ("Estate"),
- b. Ashley Thomas, surviving daughter,
- c. Chayvaughn Payne, surviving son, and
- d. Armisha Payne, surviving daughter.

5. Plaintiff, Heather Tritt, is the duly appointed Personal Representative of the Estate of Angela Carr. As such, she is entitled and empowered by the Florida Wrongful Death Act to recover all the damages allowed under its provisions for Angela Carr's survivors, beneficiaries, and Estate.

6. At all times material hereto, Palmeto was a natural person and resident of Clay County, Florida. Before his death, Palmeto resided at 668 Timbermill Lane, Orange Park, Florida

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<sup>1</sup> To file the instant Complaint, undersigned counsel is being required by order of the Supreme Court of Florida to contemporaneously complete a "Civil Cover Sheet" with a dollar figure as an estimated amount of claim for data collection and clerical processing purposes only. The full monetary value of the damages suffered by Plaintiff is yet to be determined and will be decided in a verdict by the jury that judges the facts of this action in compliance with Article 1 of Section 22 of the Florida Constitution.

32065. However, the subject actions and inactions that led to the causes of actions alleged in this complaint occurred in Duval County, Florida.



7. Because Palmeter committed suicide at the scene of the shooting, he is unable to be sued in an individual capacity. Christi McCullars, Esq., has been appointed as the Personal Representative of the Estate of Ryan Palmeter, and is deemed a citizen of the State of Florida.

8. At all times material hereto, Defendant Maryann Palmeter was a natural person and resident of Clay County, Florida. Maryann Palmeter currently resides at 668 Timbermill Lane, Orange Park, Florida 32065. She was the mother and natural parent of Palmeter and provided housing, guidance, supervision, and resources to Palmeter.

9. At all times material hereto, Defendant Stephen Palmeter was a natural person and resident of Clay County, Florida. Stephen Palmeter currently resides at 668 Timbermill Lane, Orange Park, Florida 32065. He was the father and natural parent Palmeter and provided housing, guidance, supervision, and resources.

## THE INCIDENT

10. Palmeter was a 21-year-old, white male, who lived with his parents, Defendants Stephen Palmeter and Maryann Palmeter.

11. Palmeter had various social media, internet, and dark internet profiles, which have been deleted, hidden, and are otherwise publicly unknown or unavailable to Plaintiff.

a. Palmeter uses words and concepts, such as “inb4” and “tl;dr,” as well as referencing many memes and message boards which point to heavy social media usage.

b. He references gaming servers and uses language that is common among more radical social media websites.

c. Many of his posts date back to 2015 or earlier and were under different names such as, “CaseyAnthony,” “CaseyAnthony420,” and “BillyBobSatan.”

12. Defendants Stephen Palmeter and Maryann Palmeter also had or have various social media profiles, which have been deleted, hidden, and are otherwise publicly unknown or unavailable to Plaintiff.

13. Before the shooting, Palmeter allegedly wrote three manifestos that have been described by law enforcement as “disgusting ideology of hate” and indicated, in part, Palmeter’s hatred for people of color.

14. In the only manifesto (“Manifesto”) produced publicly by Jacksonville Sheriff’s Office, Palmeter espouses offensive, dark racist hate speech. Without addressing his Manifesto at length, Palmeter focuses on:

a. “Culling” the black population and the concept of “Total N—— Death.”

b. That his actions be a call to anyone who reads his Manifesto to prevent him from being a “lone wolf.”

c. Palmeter also denigrates gay, Hispanic, Jewish, and others by race, creed, or religion, which ideologies largely follow the white nationalist speech style.

d. Palmeter claims, “There is no life left for young white people to live.” So, he advocates for “Total N—— Death.”

e. The Manifesto also advocates for “Total Politician Death” and “Total Fed Death.”

f. He makes the case for those with “something to lose,” killing surreptitiously like dropping poison in drinks, using bombs, or “plink them with a scoped rifle.”

g. Continuing to falsely justify hate and violence in patriotism, Palmeter writes, “Water the tree of liberty with the blood of tyrants” while again linking it to TND (“Total N—— Death”), TPD (“Total Politician Death”) and TFD (“Total Fed Death”) (F is believed to stand for “Fed” or “Federal,” meaning agents of the federal government).

h. Palmeter also cites false claims of “election fraud,” common of white nationalist bravado, saying, “That precinct in Michigan didn’t magically obtain 40,000 votes for Joe Biden . . . it was election fraud.” Therefore, the “American Experiment has finally failed.”

i. Palmeter specifically references the “Boogaloo Boys,” calling them “absolute fa—— and larpers,” and “good day cuckservatives” who “ruined Hawaiian shirts.” Yet, he says he supports their beliefs related to total killing of feds and politicians saying he, “make friends with them for the TFD and TPD portion of le boog.”

15. Before the shooting, Palmeter drew on his gun with white marker or white-out. Both the Manifesto and gun markings are akin to Brenton Tarrant. Tarrant killed 51 persons in

attacks on two New Zealand mosques. Tarrant's guns reflect his racism and reference to Adolf Hitler. Tarrant's firearm is below:



16. By contrast, this is Palmeto's firearm:



a.



b.



c.





d.

17. Because of the lack of cooperation by government entities, law enforcement, prosecutors, and others, Plaintiff is unable to fully investigate the manifestos, markings, internet profiles, and similarities to other mass shootings.

18. The FBI and other federal agencies should have been aware of Palmeter, intervened, and instituted action against him and his parents because he was a minor frequently posting about racially motivated killings and threats to politicians and federal agents. The FBI and Department of Justice have been non-responsive to our requests for documents or information.

19. The concepts of anti-black, anti-politician, anti-federal agents, and mass assassinations need extensive discovery and research. This lawsuit is needed to give power for subpoenas and depositions.



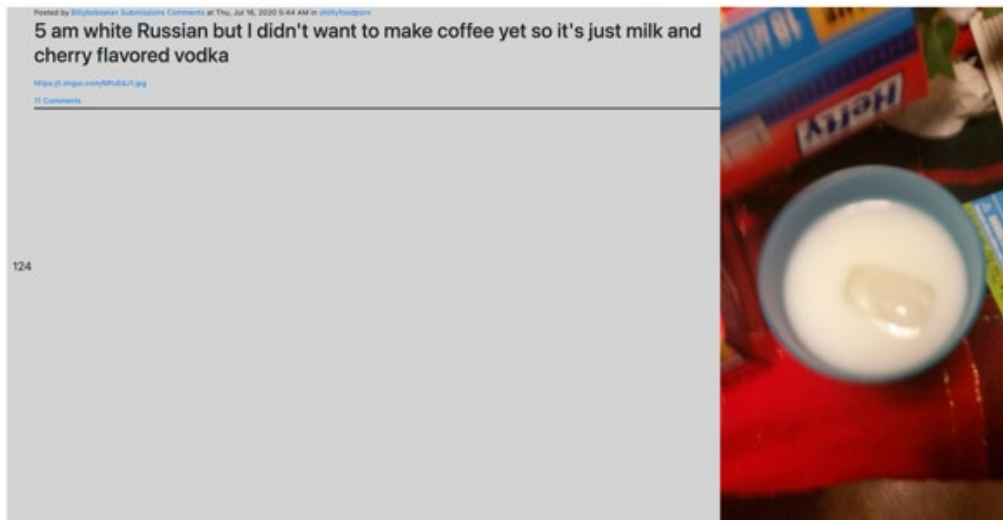
## PARENTAL NEGLECT

20. As parents, roommates, or custodians, Defendants Stephen Palmeter and Maryann Palmeter were specifically aware of Palmeter’s mental health issues, hatred towards others, suicidal or homicidal ideations and violent propensities.

21. Stephen Palmeter and Maryann Palmeter continued to grant or provide Palmeter the use of their home, resources, and finances. This included a private space for Palmeter to lock as well as access to the internet for Palmeter to use at his discretion or without any oversight.

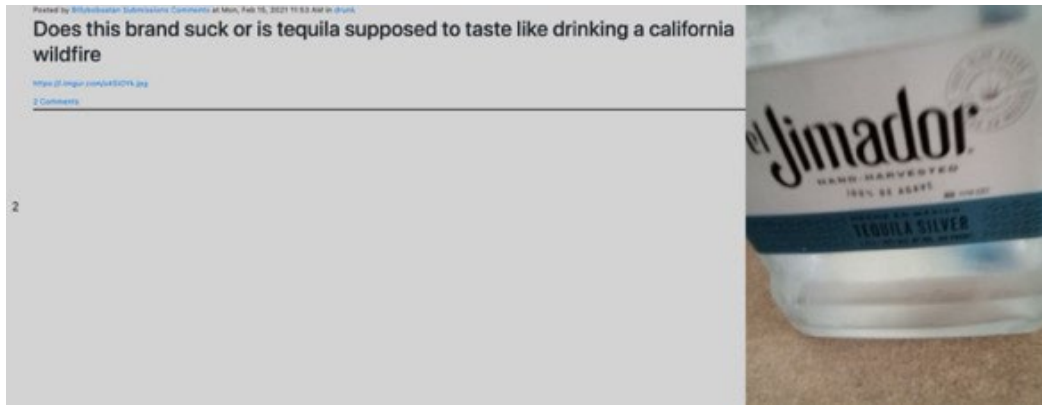
22. Despite being an underage teenager, Palmeter frequently posted about being drunk, abusing drugs, and openly combining them with violent video games and violent hate speech on social media. He obtained alcohol, pills, and drugs from his parents from a young age.

23. For instance, the following posts were from a Reddit account associated with Palmeter in which he posts as “Billybobsatan” on Thursday, July 16, 2020, 5:44 a.m. that, “5 am white Russian but I didn’t want to make coffee yet so it’s just milk and cherry flavored vodka.”

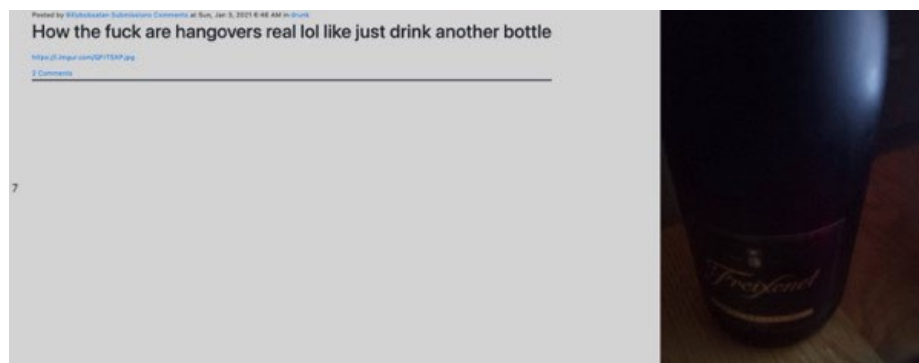


a.

24. Other alcohol related posts included the following:



a.



b.

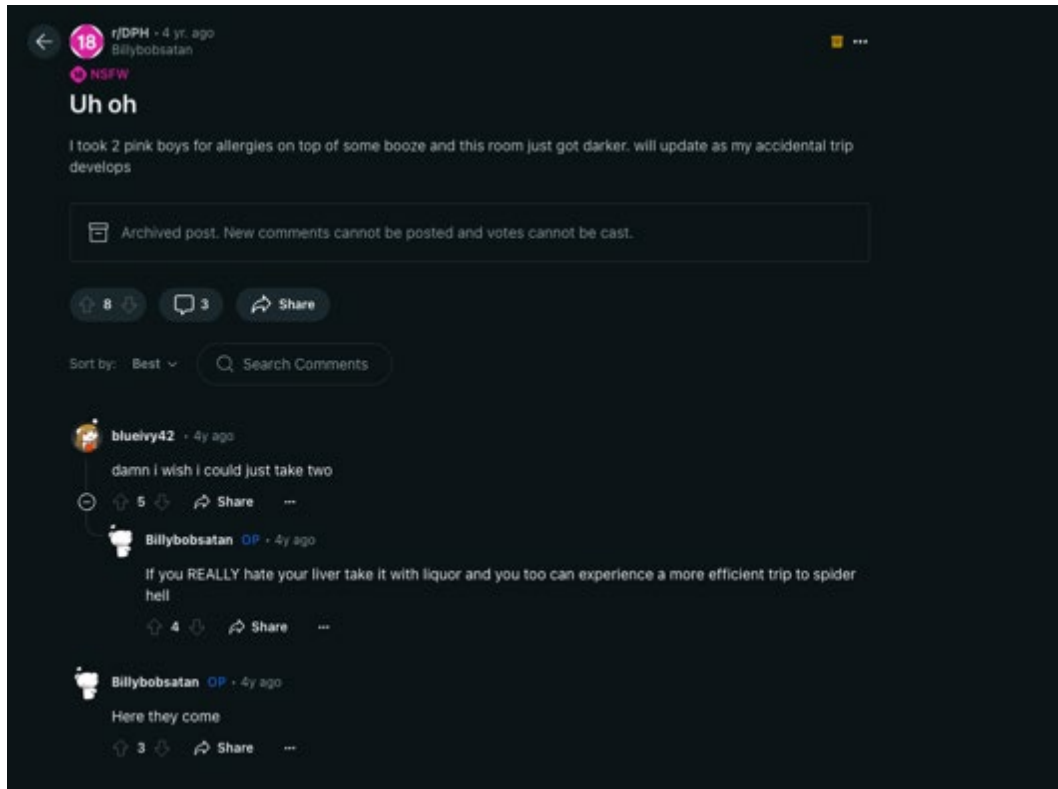


c.

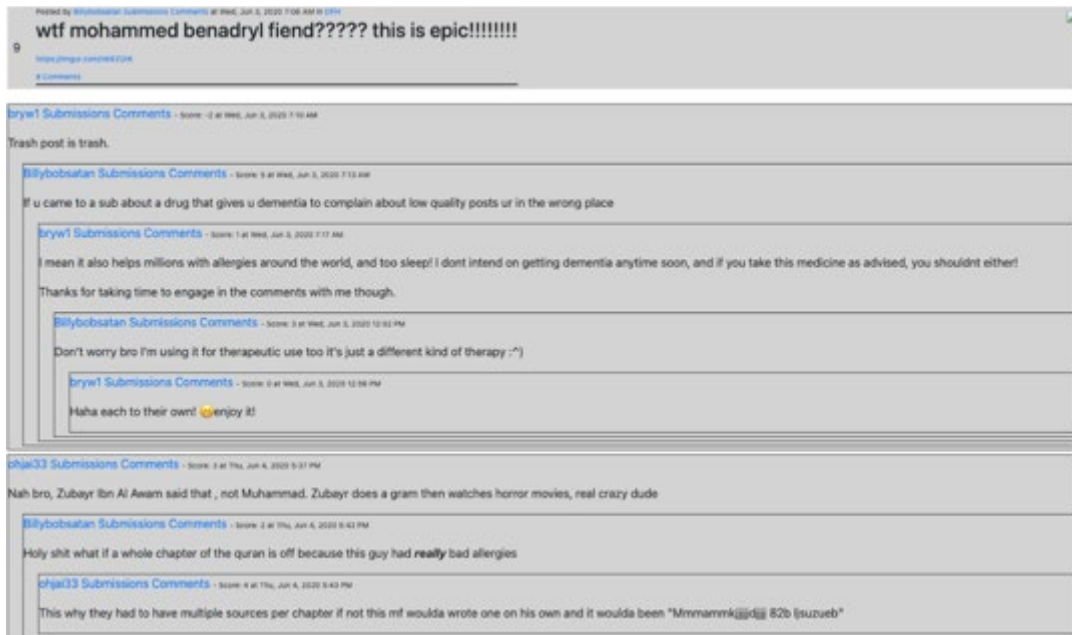


d.

25. Palmer also openly discussed abuse of Robitussin or Benadryl. This was also when he was a minor.



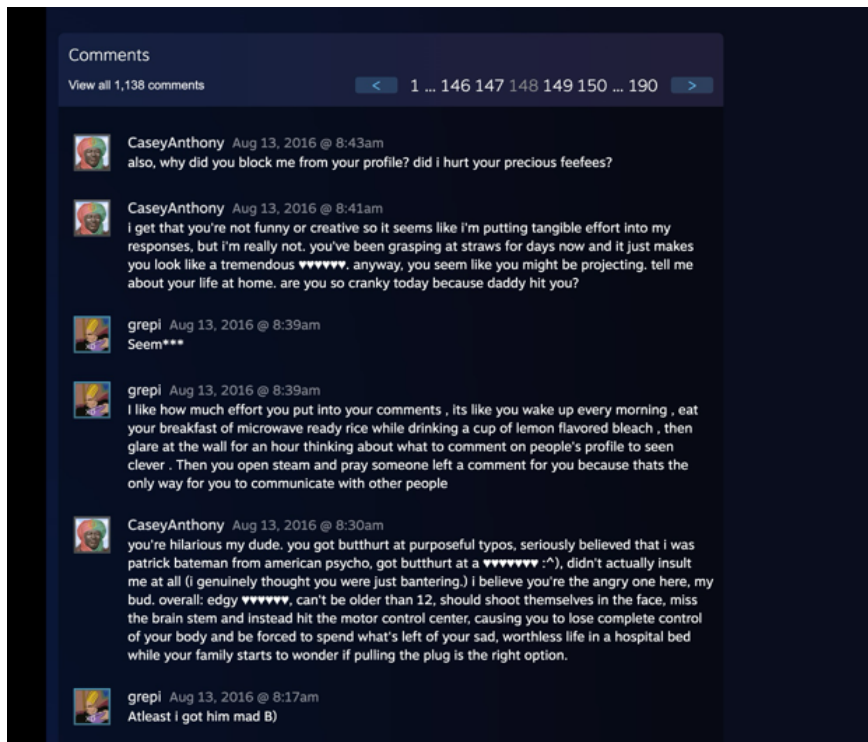
a.



b.

26. Palmetor’s reckless use of message boards and social media began as early as 2015, when he would have only been 13 years old.

27. By 2016, his posts as “CaseyAnthony” were very violent:





28. He also would post in languages such as Afrikaans to hide hate and violent speech from moderation:


Comments


View all 1,138 comments


< 1 ... 128 129 130 131 132 ... 190 >


 CaseyAnthony Oct 9, 2016 @ 7:52pm  
 Jy fokken dood, kind. Ek kan enige plek wees, enige tyd, en ek kan jou doodmaak in meer as sewe honderd maniere, en dit is net met my kaal hande. Nie net is ek op groot skaal opgelei in ongewapende gevegte, maar ek het toegang tot die hele arsenaal van die Verenigde State Marine Corps en ek sal dit gebruik tot sy volle omvang van jou misrabele gat afvee die aangesig van die kontinent, jou klein kak. As jy net kon geweet het wat onheilige vergelding jou klein "slim" opmerking was op die punt om af te bring oor julle, miskien het jy sou jou fokken tong gehou. Maar jy kon nie, jy nie gedoen het nie, en nou is jy die prys betaal, fokken jy idioot. Ek sal woede kak oor jou en sal jy verdrink in dit. Jy is dood fokken, kiddo.

 CaseyAnthony Oct 9, 2016 @ 7:52pm  
 Wat de ♥♥♥ het jy net fokken sê oor my, jou klein ♥♥♥♥♥? Ek sal maar jy weet ek gegradueer beste in my klas in die Navy Seals, en Ek het betrokke by talle geheime klopjagte op Al-Qaeda, en ek het meer as 300 bevestig dood. Ek opgeleide in gorilla-oorlogvoering en ek is die top sniper in die hele Amerikaanse gewapende magte. Jy is niks vir my maar net nog 'n teiken. Ek sal julle vee die ♥♥♥ met presisie die hou van wat nog nooit voorheen gesien het op hierdie aarde, let op my fokken woorde. Jy dink jy kan daarmee wegkom sê dat kak vir my oor die internet? Dink weer, fokker. As ons praat ek kontak met my geheime netwerk van spioene in die VSA en jou IP word nou opgespoor sodat jy beter voor te berei vir die storm, luim. Die storm wat wipes uit die patetiese dingetjie jy jou lewe te roep.

 FerventBlack Oct 9, 2016 @ 2:12pm  
 What are you ♥♥♥♥♥♥♥ gay? You think your ♥♥♥♥♥♥♥ communist wall can block ME from raping and pillaging your lands? I'LL SACK YOU JUST AS I HAVE CONSTANTINOPE.

 CaseyAnthony Oct 8, 2016 @ 7:00pm  
 keep trying ♥♥♥♥♥♥♥

 CaseyAnthony Oct 8, 2016 @ 6:48pm  
 well do it loser spare your family the burden of dealing with you

 CaseyAnthony Oct 8, 2016 @ 10:14am  
 ♥♥♥♥♥♥♥ queer i thought i told you to slit your wrists

29. Translated, those posts reveal in 2016, at 14 years old, Palmeter was saying,

You're fucking dead, kid. I can be anywhere, anytime, and I can kill you in more than seven hundred ways, and that's just with my bare hands. Not only am I extensively trained in unarmed combat, but I have access to the entire arsenal of the United States Marine Corps and I will use it to its fullest extent to wipe your miserable ass off the face of the continent, you little shit. If only you could have known what unholy retribution your little "clever" comment was about to bring down on you, maybe you would have held your fucking tongue. But you couldn't, you didn't, and now you've paid

the price, you fucking idiot. I will shit anger on you and you will drown in it. You're fucking dead, kiddo." And, "What the ♥♥♥ did you just say about me, you little ♥♥♥♥♥? I will but you know I graduated best in my class in the Navy Seals, and I have been involved in numerous secret raids on Al-Qaeda, and I have confirmed more than 300 dead. I trained in gorilla (sic) warfare and I am the top sniper in the entire US armed forces. You are nothing to me but just another target. I will sweep you the ♥♥♥ with precision the likes of which has never been seen before on this earth, mark my fucking words. You think you can get away with telling me that shit over the internet? Think again, fucker. As we speak I contact my secret network of spies in the US and your IP is now being tracked so you better prepare for the storm, luim. The storm that wipes out the pathetic little thing you call your life.

30. Determining what these words meant is as simple as copying and pasting them into Google translate.

31. Palmetoer's father, Stephen Palmetoer, extensively used social media to mock Donald Trump and express daily opinions about the incompetence of and criminal behavior within the Republican Party.



a.



**Steve Palmeter**  
June 20, 2023 · 🌐

So it looks like US AG Merrick Garland was politically afraid to investigate Trump so he endorsed this "bottom up" investigatory tactic instead, the way the FBI goes after organized crime. Arrest the lower level criminals, get them to turn on their boss, and keep working up the chain until you reach The Godfather, or, in this case, Trump.

Problem is, Garland never wanted to see evidence implicating the former President or those people in his orbit. He didn't want to hear 'the T-word'.

Nothing really happened until Trump said he would run for POTUS again in 2024. That's when Garland appointed Special Counsel Jack Smith who not only started looking at the January 6th insurrection but also Trump's fake elector scheme and his fundraising efforts along with the classified documents case. The bottom up investigation has turned into a top down investigation.

I can see Garland's point about trying to steal clear of politics but he went too far. Not sure he needs to be fired for this or not



WASHINGTONPOST.COM  
**FBI resisted opening probe into Trump's role in Jan. 6 for more than a year**  
In the DOJ's investigation of Jan. 6, key Justice officials also quashed an early plan for a ta...

👍👎 4 2 comments

b.

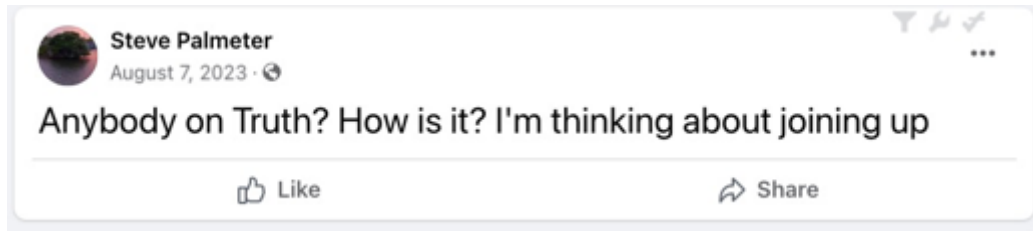
**Steve Palmeter**  
August 2, 2023 · 🌐

Don't get me wrong, I'm glad to see that our Constitution still matters, but if you think Trump's gonna spend 1 day in jail then the stuff you're smoking wasn't bought at a state licensed dispensary

👍👎 2

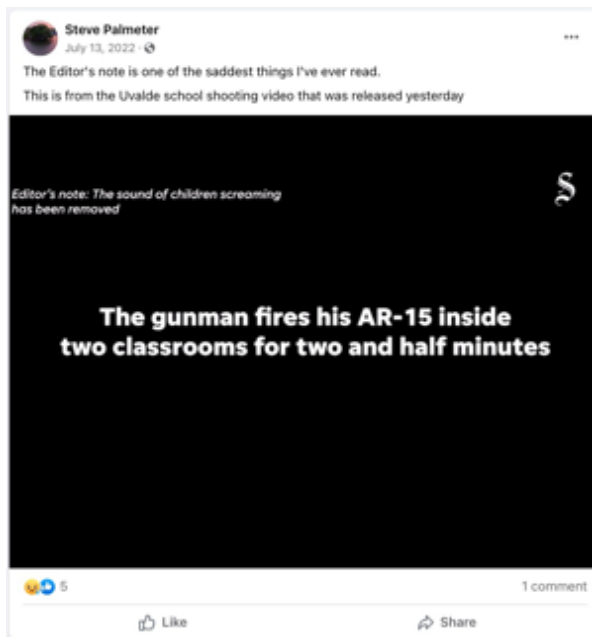
👍 Like ➦ Share

c.



d.

32. Stephen Palmetor also consistently posted about mass shootings.



a.



b.

**Steve Palmeter**  
 October 5, 2022 · 🌐

Alex Jones is expected to testify in another civil lawsuit file by Sandy Hook parents, that's always entertaining

👍 Like      ➦ Share

c.

### Steve's Post



**Steve Palmeter**  
 April 6, 2023 · 🌐

What just happened in TN scares me.  
 I'm afraid of the violence that this may bring.  
 And I'm afraid that this is just the beginning of what these people are going to do

👍👎👏 7      5 comments

👍 Like      ➦ Share

Most relevant ▾

- Michael Isaacs Hughes**  
 As residents we are terrified, but the world's eyes are on Tennessee and were pissed especially our youth. Other supermajority states will follow suit. Were watching real-time fascism at play. I'm old enough to remember when we were blue, but 9/11 changed all of that.

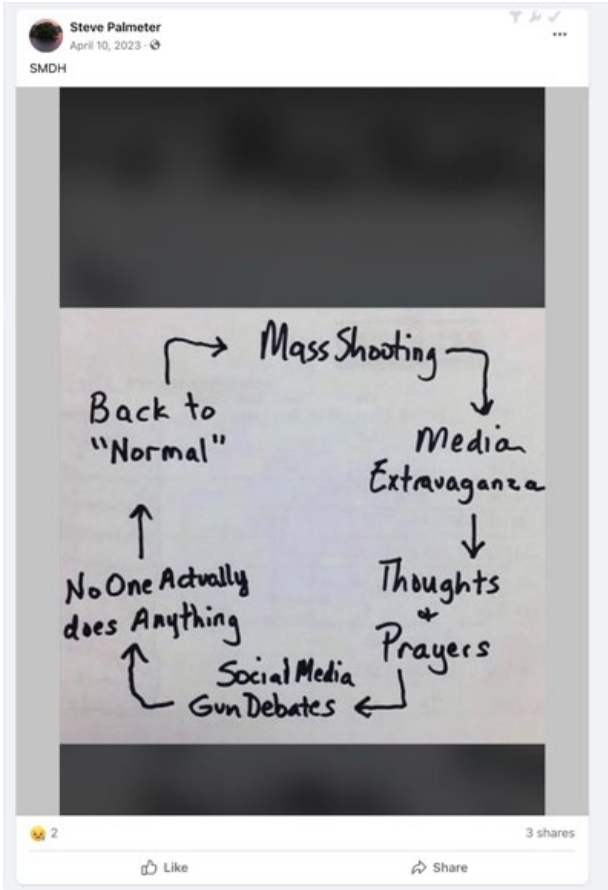
1y Like Edited      3 👍👎
- Steve Palmeter**  
**Michael Isaacs Hughes** if you haven't heard yet, check the news and see what just happened in NC

1y Like
- Michael Isaacs Hughes**  
 The Cotham shitshow, yeah were watching her too. We live less than 10 miles from NC/Tn border. Madness all around. Were dots of blue in a sea of red.

1y Like
- Steve Palmeter**  
**Michael Isaacs Hughes** I know the feeling, 65% of our county voted for DeSatan and Trump

1y Like
- Bruce Bornholdt**  
 Where's the swastika?!

1y Like



d.




e.

**Steve Palmeter**  
 May 7, 2023 · 🌐

TX gunman was a neo-nazi extremist, aka a mainstream Republican, who had an extremist right wing patch stuck on the chest of his bulletproof vest. Law enforcement is investigating this as a racial or ethnically motivated hate crime.

He was carrying an AR-15 style assault rifle and a pistol. More weapons and ammo were found in his car.

9 people are dead and 3 are still in critical condition



NBCNEWS.COM

**What we know about the slain Texas mall massacre suspect, Mauricio Garcia**  
 Garcia, who had a tactical vest, was armed with a rifle and a handgun, a senior law enforce...

👍 2 1 share

👍 Like ➦ Share

f.

**Steve Palmeter** is 🎬 watching **Unforgiven**.  
 April 29, 2023 · 🌐

A true classic, Eastwood, on both sides of the camera, at his best.

Just like The Iliad, we see the nonduality of life. There's no gray area, man is only good or bad, righteous or evil. There's no in-between.

Winning 4 Oscar's, Unforgiven spent over a year in theaters and is now included in The National Film Registry.

If you watch, pay attention to the score. The music over the end credits is especially beautiful

❤️ 1 1 comment

👍 Like ➦ Share

g.




33. Stephen Palmeter frequently posted about alcohol, including once bragging his son was able to trick a server into selling him alcohol days before his 21<sup>st</sup> birthday.

Steve's Post 🔍 🗑️ ✕



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 **Steve Palmeter** November 27, 2022 · 🌐 ⋮

So tomorrow is Ryan's 21st birthday and we went out with family to celebrate a day early today. The waitress came to the table, Ryan ordered a margarita and she asked him for his ID. Ryan took it out, handed it to her and said "Today's my birthday". I said "Congratulations son, you're getting carded as an adult for the first time". The waitress look at his driver's license for a second, got a puzzled look on her face and finally said "Happy Birthday" and brought him his mar... [See more](#)



   Tina Warren and 14 others 5 comments



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

 Like  Share



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All comments ▾

 **Cindy Laskowski**  
Happy Birthday to Ryan.  
1y Like 

 **Shari Wit**  
Happy birthday, Ryan!  
1y Like 

 **Pam Foley Schirkofsky**  
Congrats! If she is anything like me, she probably has no idea what today's date is.  
  
1y Like 2 

 **Steve Palmeter**  
**Pam Foley Schirkofsky** that's what we figured, and it worked 😊  
1y Like 

a.





Steve Palmeter

November 29, 2022 · 🌐



Ryan getting carded and buying his first 6 pack legally last night on his 21st birthday.  
I highly approved of his choice



👍❤️ Tina Warren and 7 others

1 comment

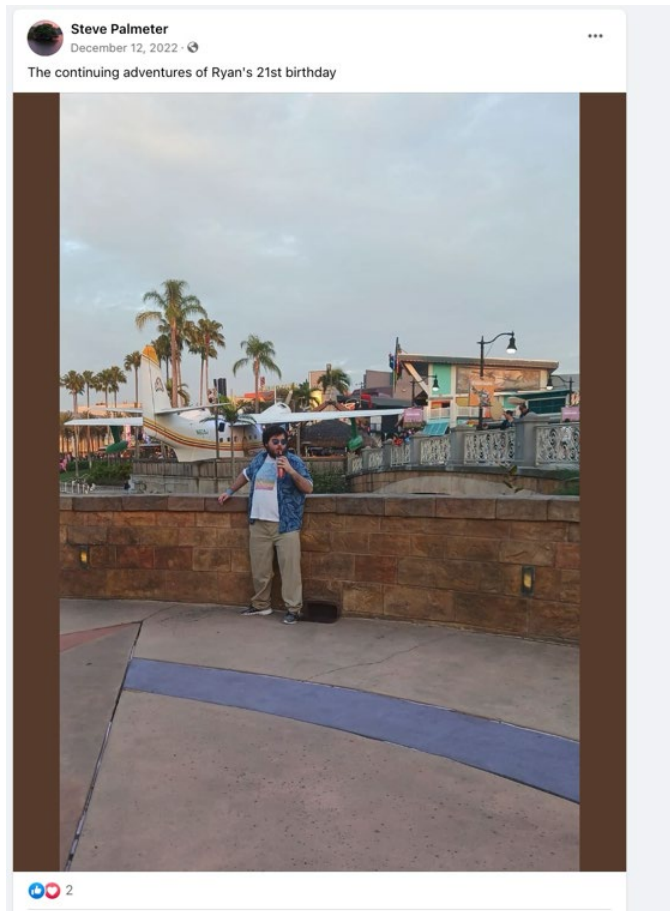
👍 Like

➦ Share

b.

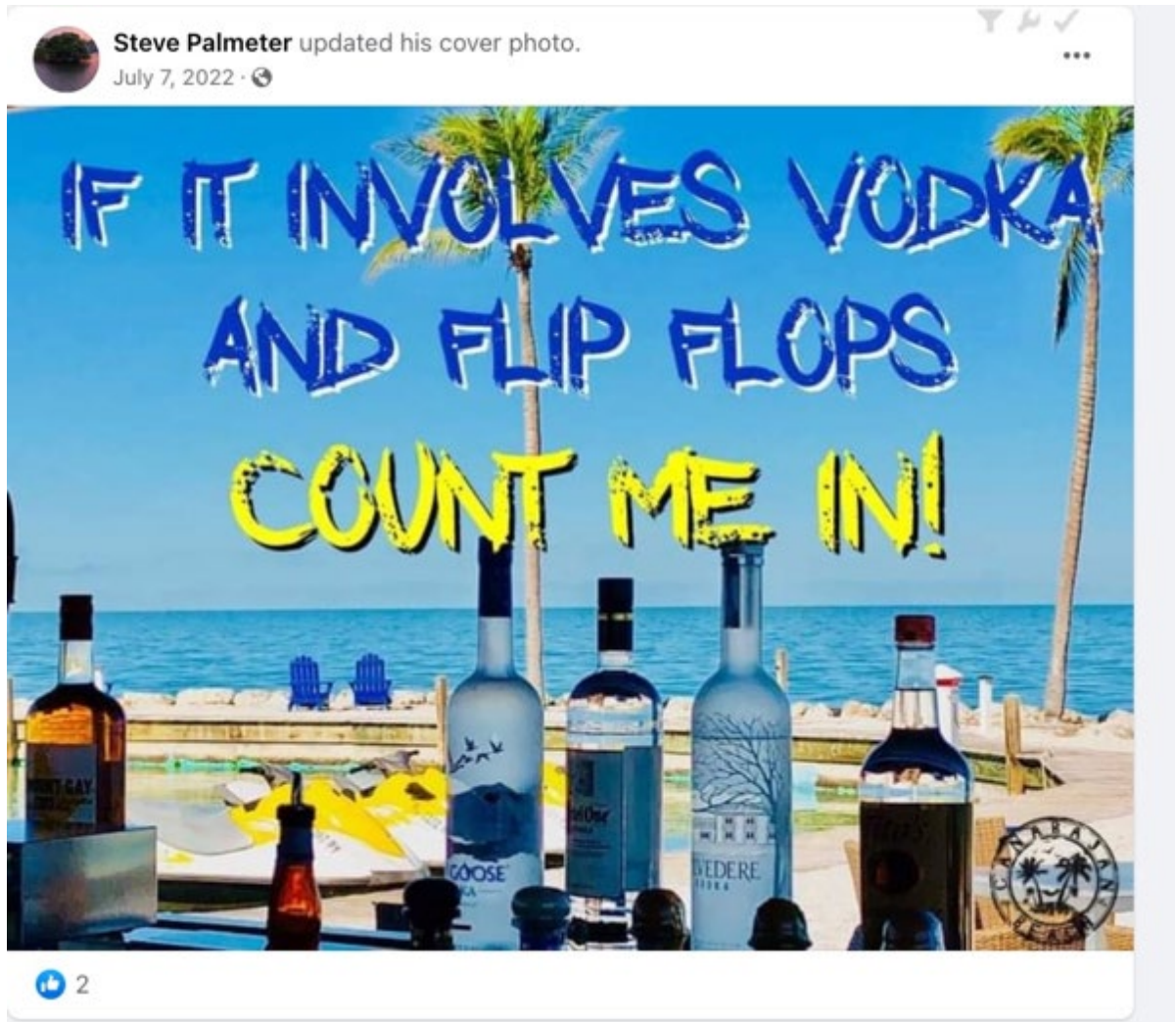


c.



d.

e. Note, Palmeter is wearing the same shirt he was wearing on the day of his assassination, which features Hawaiian theme like what was worn by the radical / extreme “boogaloo boys.”




f.



**Steve's Post** ✕


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 **Steve Palmeter**  
February 11, 2023 · 🌐



So I checked out the Green Dragon dispensary, it's at Blanding and College, beside the Publix, in OP.

Nice place, friendly staff and a good selection. The clerk spent a bunch of time with me answering all my questions. And they didn't try to sell me extra stuff and ad-ons, I didn't get that shady used car salesman vibe.

Lots of flower and pre-roll if you're in to that. I got 2 sativa vapes and, for the first time, some pills. Guess I'll find out how good they are in an hour or so 😊


 Tina Warren and 3 others 3 comments

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 Like  Share

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Most relevant ▾


 **Julee Ellison**  
Let me know your thoughts on the vapes please. All I have ever done is get flower, but I was thinking about possibly trying vapes.

1y Like

 **Steve Palmeter**  
**Julee Ellison** I've been using vapes from Trulieve for about a year. Love the vapes, hat the Trulieve.

About an hour or so before I go to bed I'll take a few puffs to relax and then I get 4 or 5 hours of good, restful sleep

1y Like

 **Julee Ellison**  
**Steve Palmeter** hmmm ... I think I'll give them a try!

1y Like

g.

h.

34. Stephen Palmeter allowed their young teenage son to use internet-based resources to openly ridicule and share a political platform on social media that included the discussion of mass shooters, shootings, and political division. He followed in his father's footsteps, but in opposite political fashion with no parenting, controls, or supervision by his parents despite posting hate speech, criminal activity, and daily progressing into a deeper and deeper world of games, guns, alcohol, hate, racism, and disorder.

35. By 2023, Palmeter would frequently post about TND, an acronym he admits in his Manifesto stands for (“Total Nigger Destruction”).<sup>2</sup> The words were written on his AR-15 used to kill three African Americans.

36. Stephen Palmeter and Maryann Palmeter allowed Palmeter to not only play video games based on shooting and killing people, but also gave him unfettered access to post about those games. Palmeter’s documented history of gameplay and posting included days and times he should have been in school.

37. Stephen Palmeter and Maryann Palmeter allowed Palmeter to obtain and store large quantities of guns and ammunition at their residence despite notice of mental defect, an instable history of homicidal and/or suicidal thought and making violent threats to others.

38. Stephen Palmeter and Maryann Palmeter provided no warning to the public or law enforcement despite becoming aware of Palmeter’s general and specific plans to cause harm.

39. Stephen Palmeter and/or Maryann Palmeter were aware and personally involved with the involuntary mental health confinement (i.e., Baker Act) of Palmeter after he threatened to jump off a building in downtown Jacksonville.

40. Stephen Palmeter and/or Maryann Palmeter were aware and personally involved with a domestic battery call after Palmeter was involved in a physical altercation with his older brother.

41. Stephen Palmeter and/or Maryann Palmeter were aware that Palmeter was, “holed up in his bedroom” at their own house. However, they ignored it.

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<sup>2</sup> The word is used once in this complaint. It will otherwise be typed N—.

42. According to released portions of a 911 call, Stephen Palmeter said his son, Palmeter, stopped taking psychiatric medication with their knowledge and Stephen Palmeter's and/or Maryann Palmeter's failure to intervene.

43. Any parent and custodial supervisor would understand the consequences of one getting off prescribed mood stabilizing medication and report same. Yet, Stephen Palmeter and/or Maryann Palmeter did nothing.

### **THE FIREARM**

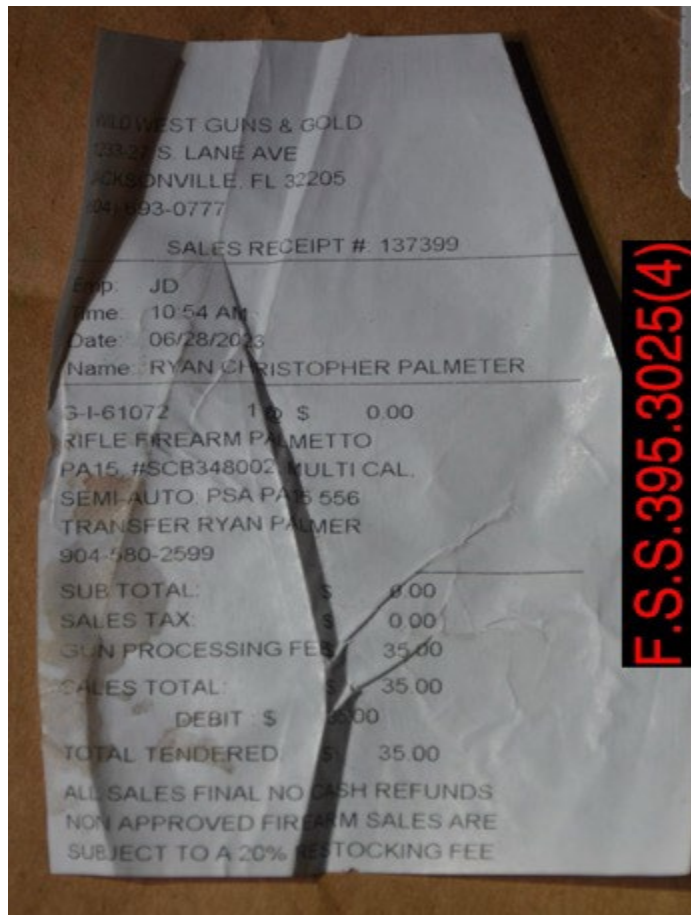
44. Palmetto State Armory ("PSA") is a firearms company based in South Carolina with an online marketplace and brick and mortar retail locations. PSA's mission statement is to "sell as many AR-15 and AK-47 rifles as we can."

45. PSA has a history of marketing guns by using division, political strife, and even marketing guns to a population in states of mental crisis and with emotional problems.

46. Palmeter purchased his firearm from Palmetto State Armory ("PSA"). He was the type of personality that PSA marketed to. PSA is known for its political marketing and engaging in and profiting from separatist ideology while manufacturing and selling firearms.

47. PSA arranged for this gun to be legally purchased in Florida through a local store "Wild West Guns and Gold."





a.



b.

48. Further, PSA has marketed and manufactured gun parts with such engravings as “Build the Wall,” which read, “Border Wall” and “Stay Back.” This espouses anti-immigrant,

white nationalist ideology like what was reflected in the Manifesto and writings on Palmeter's firearm.



49. PSA wraps mass firing weapons with politically charged rhetoric and then markets it to individuals like Palmeter.

50. Political engravings such as The Sheepdog, Tyranny, the Snek (a play on the Don't Tread on Me flag), MAGA, and Trump themed engravings, ones mocking President Biden with the counter-culture expression, "Let's Go Brandon," and engravings featuring a woman saying, "okay Karen," and others have been available to choose from at Palmetto State Armory. Additionally, the Joe Biden edition had three firing settings labeled "F@CK!" "JOE!" and "BIDEN!"

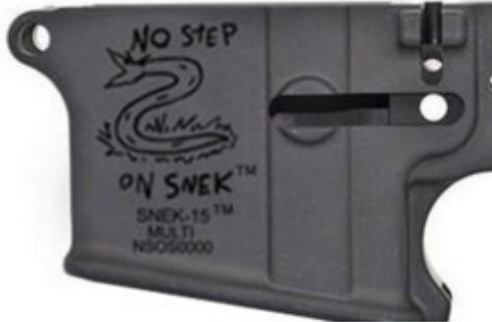


PSA AR-15 "SHEEPDOG-15" GOA FUNDRAISER STRIPPED LOWER RECEIVER



PSA AR-15 "TYRANNY-15" STRIPPED LOWER RECEIVER \*PRE-ORDER ITEM -

a.



PSA "SNEK-15™" AR-15 STRIPPED LOWER RECEIVER



PSA "MAGA-15" AR-15 STRIPPED LOWER RECEIVER

b.



BLEM PSA AR-15 "LET'S GO BRANDON" STRIPPED LOWER RECEIVER



PSA AR-15 "OK-KAREN-15" STRIPPED LOWER RECEIVER

c.

51. PSA painted a whole line of assault weapons in the style of a Hawaiian shirt, the unofficial uniform of the Boogaloo. The company marketed these weapons as “the best American-made AK-47s” with a “Big Igloo Aloha finish.” In the Boogaloo movement’s parlance, the Big Igloo and the Big Luau are slang for the second civil war. The Boogaloo Boys took part in the Jan. 6 storming of the Capitol and they also figured in a 2020 plot to kidnap Michigan Gov. Gretchen Whitmer.

52. Palmeto was wearing a Hawaiian shirt at the time of the shooting.

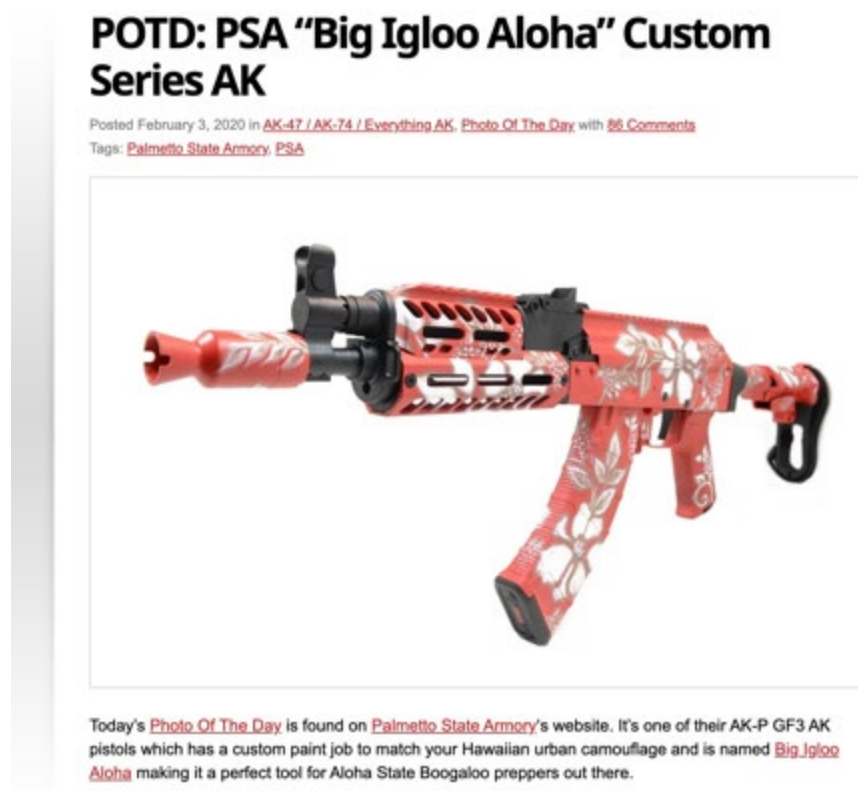
53. Palmeto admired Donald Trump because he frequently spoke about the “swamp” that is the federal government. In one post, posed as “CaseyAnthony,” Palmeto celebrated the election of Donald Trump:



a.

54. In June of 2020, a Boogaloo Boy was attributed with fatally shooting two sheriff's deputies in Santa Cruz. The killer wrote "boog" in blood on the hood of a car. Also in June of 2020, a trio of alleged Boogaloo Boys were arrested with assault rifles and explosives in Las Vegas allegedly headed for a George Floyd protest. An alleged Boogaloo Boy murdered a federal security officer and got into a shootout with police in Oakland, California. He was wearing a patch that combined an American flag and an igloo on a Hawaiian background. He is now serving a 41-year prison term.

55. The website, thefirearmblog.com covered PSA's marketing of the Big Igloo:



56. PSA's website said, "You asked for it, you got it. The Palmetto State Armory Custom Series has taken the best American Made AK-47, the PSA AK-P GF3 and given it a unique "Big Igloo Aloha" Teflon finish to give this legendary rifle a unique appeal."

57. PSA has also given a nod to 4-Chan and 8-Chan, a major social media website homes of radicalized hate speech. An argument could be made PSA’s marketing crosses separatist, if not terrorist lines, when it pulled one engraved AR-15 bottom depicting MAGA and KEIIK. Kekistan is a fictional country invented by users on 4-Chan, adopted by extremists and the alt-right movement. PSA later backed off its mistake, saying, “We understand the original concept of Kekistan was purely innocent, but the current use of it by certain groups is something that PSA does not want to be associated with in any fashion. I know you guys did not mean for this lower to be thought of as a “White Nationalist” lower, but that is what it may come to mean by some.”



58. Former President Donald J. Trump visited PSA’s retail outlet in Summerville, South Carolina on September 25, 2023.

59. PSA’s owners, Julian Wilson and Jamin McCallum, posed with Trump at PSA along with Julian Wilson’s father (U.S. Congressman Representative Joe Wilson). They then brought in South Carolina Attorney General Alan Wilson for the photo opportunity. Alan Wilson is Julian Wilson’s brother and Joe Wilson’s son.

60. They not only showed him a Glock semi-automatic pistol inscribed with his name and likeness but offered to sell him one. Trump is under federal indictment and cannot own or possess a firearm.





61. PSA has had recent claims of racism in the workforce. Specifically, in a federal lawsuit, including displays of a noose and use of the N-word without consequence.

62. PSA marketed its guns using xenophobic, white nationalist and/or separatist language, often to individuals like Palmeto.

### **THE RAMPAGE**

63. On or about April 6, 2023, Palmeto purchased a Glock handgun at Orange Park Gun and Pawn.



64. On or about June 22, 2023, Palmeto purchased an AR-15 type rifle at Wild West Guns and Gold. The subject rifle was marketed and manufactured by PSA.



65. After receiving the gun, Palmeter placed racist and separatist markings on the gun.

66. According to reports, at 11:39 AM, on August 26, 2023, Palmeter loaded up firearms, ammunition, and bulletproof / tactical gear at the home he shared with his parents and departed Clay County headed toward Jacksonville.

67. According to Jacksonville Sheriff's Office, at 1:08 PM on Saturday, August 26, 2023, an 11-round ShotSpotter (gunshot censor) was activated at the Dollar General store at 2161 Kings Rd, Jacksonville, Florida.

68. Many of these times are drawn from different data sources and are not necessarily accurate to each other.

69. This initial set of 11 rounds of bullets are fired by Palmeter into the Kia sedan operated by Angela Carr, in the parking lot, killing her.

70. Palmeter then entered the Dollar General store and killed second victim, 19-year-old Anolt "AJ" Laguerre Jr.

71. According to the Sheriff, at 50 seconds past 1:09 PM, the first 911 call goes out from someone in the vicinity.

72. Approximately 1:10 PM to 1:13 PM on Saturday, August 26, 2023, Palmeter's shot and killed a third victim Jerrald Gallion, 29 years old.



73. Palmeter then chased other survivors through the store, shooting at but missing them.

74. Palmeter warned several white people to “run.”

75. Around 1:14 PM on Saturday, August 26, 2023, Palmeter enters the Dollar General office at the rear of the store.

76. At approximately 1:18 PM on Saturday, August 26, 2023, Palmeter texted his father and instructs him to use a screwdriver to break the lock and enter his room.

77. Palmeter killed himself at some point after this text message.

78. Despite notice of impending harm, it allegedly took over 30 minutes for Stephen Palmeter and/or Maryann Palmeter to call 911.

79. Stephen Palmeter entered his son's room at the home he and his wife owned and found a last will and testament, a suicide note on his laptop, and some form of racist writings.

80. It was not until 1:53 PM on August 26, 2023 when Stephen Palmeter called 911 to express concern about his son, who he said had left the house two hours beforehand.

81. Palmeter's father, Stephen Palmeter, was aware of his son's emotional issues, hatred and general or specific intent to cause harm and told others Palmeter was "upset."

82. Stephen Palmeter told others he found what he called the diary of a "madman" in his room that stated his son hated Black people.<sup>3</sup>

83. In fact, it is not the diary of a madman, but an increasingly violent movement to kill black people (TND—Total— Death), politicians (TPD—Total Politician Death) and federal officials (TFD—Total Fed Death).

84. According to allegations, Palmeter's own suicide note to his parents revealed a history of alcohol and pain pill abuse. In one line, Palmeter says to his father, "That alcoholism made it a lot easier until the end, though. It's just like those pain pills of yours, dad."

85. Additionally, evidence photos taken from Palmeter's room reveal books entitled, "The Christian and his Machine Gun," "A Time for War," and "The Shooter's Bible."

86. Evidence photos taken from Palmeter's room also reveal massive amounts of alcohol and prescription bottles.

87. Further, this edited photo was found in his room.

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<sup>3</sup> <https://www.claytodayonline.com/stories/oakleaf-graduate-kills-three-in-racially-motivated-jacksonville-shooting,82658>.



88. The photo appears to depict Eric Harris, who perpetrated the Columbine High School massacre on April 20, 1999. Harris and his co-conspirator killed 12 students, one teacher, and wounded 24 others. It also depicts a young Syrian child who drowned in a failed attempt to seek exile in 2015. It is all photoshopped on top of what appears to be a scene from a shooting video game, Battlefield 4: Siege of Shanghai.

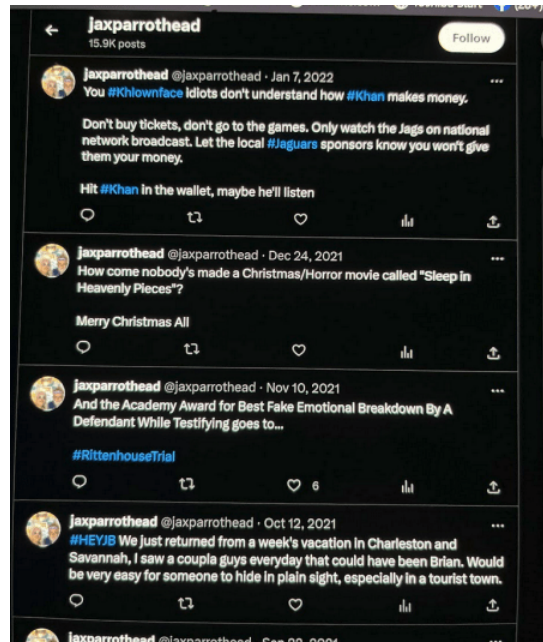
89. As Palmeter noted in his Manifesto, he is not a lone wolf and others have followed him since this shooting, attempting other mass shootings, and an attempted assassination of a former President / Presidential candidate, Donald Trump, which included the death of another victim in the crowd, Corey Comperatore.

### **DELETED SOCIAL MEDIA**

90. Various social media pages have been deleted since the incident.

91. Some of these pages were apparently maintained by Stephen Palmeter and/or Maryann Palmeter and reveal political ideology, discussion of mass shootings, separatist ideologies, and more issues that need to be investigated.

92. For instance, in one now deleted page, @jaxparrothead discussed Kyle Rittenhouse and the January 6 insurrection matters.



93. Additionally, Palmeter was involved in both social media and message board communities.

### CRIMINAL / CIVIL RECORDS

94. Certain arrest, investigative, and court records have been sealed or withheld and need to be investigated.



**ACTION FOR DAMAGES**

**COUNT I - WRONGFUL DEATH AGAINST  
CHRISTI MCCULLARS, ESQ., AS THE PERSONAL REPRESENTATIVE OF THE  
ESTATE OF RYAN PALMETER**

95. Plaintiff re-alleges Paragraphs 1-94, as set forth fully in this Count and further alleges as follows.

96. Palmeter owed a duty to Angela Carr to act as a reasonable and prudent person under the same or similar circumstances while discharging a firearm.

97. Palmeter breached this duty when he negligently fired several shots at the vehicle Angela Carr was in.

98. Palmeter knew or should have known that firing a handgun at a vehicle could cause harm to occupants in the vehicle.

99. Such harm should have been known to Palmeter to include physical injury, emotional distress, terror, property damage, and death.

100. Angela Carr suffered the most extreme consequence of Palmeter's actions; Angela Carr lost her life because of Palmeter's negligence.

101. As a result of her death, the Estate of Angela Carr has suffered damages, including medical or funeral expenses that have become a charge against the Estate or were paid by or on behalf of the decedent.

102. Further, as a direct and proximate result of Palmeter's conduct mentioned above of the Defendant and death of Angela Carr, the Estate has lost its prospective net accumulations that might have reasonably been expected but for the wrongful death, reduced to present value.

103. The Estate and survivors are also entitled to all other damages as allowed by 768.21, Florida Statutes.

WHEREFORE, Plaintiff, Heather Tritt, as Personal Representative of the Estate OF Angela Carr, demands judgment against Defendant Christi McCullars, Esq., as Personal Representative of the Estate of Ryan Palmeter, for compensatory damages, costs, interest as allowed by law, and for such other relief as this Court deems just and proper.

**COUNT II - NEGLIGENCE RESULTING IN WRONGFUL DEATH AGAINST  
STEPHEN PALMETER (FATHER)**

104. Plaintiff re-alleges Paragraphs 1-94 as set forth fully in this Count and further alleges as follows.

105. Defendant Stephen Palmeter owed a duty to Angela Carr, to act as a reasonable and prudent person under the same or similar circumstances while discharging a firearm.

106. Defendant Stephen Palmeter breached this duty when he negligently committed actions of commission and omission, failed to warn, provided resources, provided access to firearms in his home despite knowing of mental and emotional issues and otherwise committed the actions and inactions as otherwise incorporated herein.

107. Defendant Stephen Palmeter knew or should have known that his son was both a general danger to the public and a specific danger on the subject occasion and failed to take any action or provide any warning.

108. Such harm should have been known to Defendant Stephen Palmeter to include physical injury, emotional distress, terror, property damage, and death.

109. Angela Carr suffered the most extreme consequence of Defendant Stephen Palmeter's actions; Angela Carr lost her life because of his negligence.

110. As a result of her death, the Estate of Angela Carr has suffered damages, including medical or funeral expenses that have become a charge against his Estate or were paid by or on behalf of the decedent.

111. Further, as a direct and proximate result of the conduct of Defendant Stephen Palmeter and death of Angela Carr, the Estate has lost its prospective net accumulations that might have reasonably been expected but for the wrongful death, reduced to present value.

112. The Estate and survivors are also entitled to all other damages as allowed by section 768.21 of the Florida Statutes.

WHEREFORE, Plaintiff, Heather Tritt, as Personal Representative of the Estate of Angela Carr, demands judgment against Defendant Stephen Palmeter for compensatory damages, costs, interest as allowed by law, and for such other relief as this Court deems just and proper.

**COUNT III- NEGLIGENCE RESULTING IN WRONGFUL DEATH AGAINST  
MARYANN PALMETER (MOTHER)**

113. Plaintiff re-alleges Paragraphs 1-94 as set forth fully in this Count and further alleges as follows.

114. Defendant Maryann Palmeter owed a duty to Angela Carr, to act as a reasonable and prudent person under the same or similar circumstances while discharging a firearm.

115. Defendant Maryann Palmeter breached this duty when she negligently committed actions of commission and omission, failed to warn, provided resources, provided access to firearms in his home despite knowing of mental and emotional issues and otherwise committed the actions and inactions as otherwise incorporated herein.

116. Defendant Maryann Palmeter knew or should have known that her son was both a general danger to the public and a specific danger on the subject occasion and failed to take any action or provide any warning.

117. Such harm should have been known to Defendant Maryann Palmeter to include physical injury, emotional distress, terror, property damage, and death.

118. Angela Carr suffered the most extreme consequence of Defendant Maryann Palmeter's actions; Angela Carr lost her life because of Maryann Palmeter's negligence.

119. As a direct and proximate result of Defendant Maryann Palmeter's actions, Angela Carr sustained injuries that resulted in her death.

120. As a result of her death, the Estate of Angela Carr has suffered damages, including medical or funeral expenses that have become a charge against his Estate or were paid by or on behalf of the decedent.

121. Further, as a direct and proximate result of the conduct of the Defendant Maryann Palmeter and death of Angela Carr, the Estate has lost its prospective net accumulations that might have reasonably been expected but for the wrongful death, reduced to present value.

122. The Estate and survivors are also entitled to all other damages as allowed by section 768.21 of the Florida Statutes.

WHEREFORE, Plaintiff, Heather Tritt, as Personal Representative of the Estate of Angela Carr, demands judgment against Defendant Maryann Palmeter for compensatory damages, costs, interest as allowed by law, and for such other relief as this Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury for all issues so triable.

DATED: August 26, 2024.

**PHILLIPS, HUNT & WALKER**

*/s/ John M. Phillips*

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