

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
IN AND FOR PINELLAS COUNTY, FLORIDA**

STATE OF FLORIDA

vs.

CASE NO.:

Click here to enter text.

I have personally looked in the following documents, reports, notes, records and witness statements for any information required by the United States Supreme Court opinion of **Brady V. Maryland**, 373 U.S. 83 (1963) to be turned over to the defense to include a search for anything that is exonerating to the defendant, exculpatory in nature, anything that would support a valid defense, any material inconsistent statements or impeachment of any witness or evidence as well as anything that would lessen punishment and have provided all such information to the defense in writing.

- 1) A review of my notes taken in witness meetings to include trial preparation
- 2) A review of any existing notes taken by law enforcement to include personal observations and witness interviews
- 3) Any and all medical records (including psychiatric and clinical) that may have relevance to the above prosecution including those covered by HIPPA
- 4) A review of any confidential documents involving any investigative team working on the above case (eg: Child Protection team notes, reports, witness statements and documents)
- 5) Any and all electronic devices including cell phones and computers belonging to the alleged victim and listed state witnesses if it is believed such contain information relative to the above prosecution
- 6) The existence, name and address of any witness known to the prosecution that has given a statement to the state or law enforcement that is contrary to the state's theory of the case including pre and post interviews conducted during polygraph testing
- 7) Any favorable treatment given or offered to any state witness in return for cooperation as well as any favorable treatment, money or anything of value requested by a state witness in return for cooperation
- 8) Any Facebook postings made by the alleged victim in the above prosecution that were taken down but can be retrieved by the state relative to the above case
- 9) Any text messages received by the state from any witness in the above prosecution that are discoverable under **Brady**.
- 10) Inquiry made of the arresting officer/detective of all the areas mentioned in the request areas in the first unnumbered paragraph

---

prosecutor

---

Date