

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASEY MARIE ANTHONY,

Defendant.

CASE NO.: 48-2008-CF-0010925-O

DIVISION: 16

JUDGE: STAN STRICKLAND

**DEMAND FOR DISCOVERY AND INSPECTION RELATING TO  
DIGITAL FORENSIC EVIDENCE**

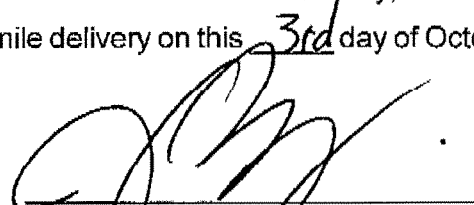
COMES NOW the Defendant, by and through her undersigned counsel, and hereby requests under Rule 3.220(a), Florida Rules of Criminal Procedure, the disclosure of digital forensic examinations performed by law enforcement agencies involved in this case. This request applies to all testing that has been, is currently being, or will be performed in the instant case. The request is ongoing. In the event that new materials responsive to this request are produced, discovered, or otherwise come into the possession of the prosecution or its agents, said materials should be provided to the defendant without delay.

1. Defense requests a duplicate of any forensic copies made by the prosecution's experts of any computer hard drive, digital storage media including but not limited to CD-ROMS, US flash drives, floppy disks, memory cards, digital camera storage, smart cards and portable hard drives.
2. Defense requests duplicates of any forensic copies made by the prosecution's experts of any cell phone and or SIM cards, media cards or other storage used in conjunction with telephony.
3. In the event prosecution's experts did not make a forensic copy of any original media, defense requests that forensically sound copies be made and furnished to the defense for examination by the defense expert.
4. Defense requests a complete inventory of all items taken that may contain any type of digital data, whether or not such items were examined or copied by prosecution's experts.
5. Defense requests a complete copy of all forensics reports, chain of custody records, and lab notes generated by prosecution's experts pertaining to the acquisition, preservation, analysis, and or reporting by said experts in the course of this investigation.

WHEREFORE, Defendant respectfully requests this Honorable Court to grant this motion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing Motion to Compel Response of Discovery has been furnished to the Office of the State Attorney, 415 North orange Avenue, Orlando, Florida 32801 by facsimile delivery on this 3rd day of October, 2008.



JOSE A. BAEZ, ESQUIRE  
FL Bar No.: 0018232  
GABRIEL E. ADAM, ESQUIRE  
FL Bar No.: 0027371  
THE BAEZ LAW FIRM  
522 Simpson Road  
Kissimmee, Florida 34744  
Tel.: (407) 705-2626  
Fax: (407) 705-2625

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND  
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASEY ANTHONY,

Defendant.

CASE NO.: 08-CF-10925

DIVISION: 16

JUDGE: STAN STRICKLAND

**MOTION TO INSPECT, TEST AND PHOTOGRAPH EVIDENCE**  
**HELD BY THE STATE OF FLORIDA**

NOW COMES, the Defendant, CASEY ANTHONY, by and through undersigned counsel and moves this honorable court to allow her defense expert to inspect, test, and photograph evidence in the custody of the State of Florida. In support thereof, the defendant states as follows:

**FACTS**

1. On August 5, 2008, the defendant was formally charged with one count of child neglect, a third degree felony and one count of Obstructing a Criminal Investigation, a first degree misdemeanor, in violation of Fla. Stat. § 837.055. The charges stemmed from the Defendant's report to local police that her two-year-old daughter had been missing since June 15, 2008. Law enforcement maintained that during the course of their investigation the Defendant had provided false statements about her employment, the babysitter she claimed she had dropped her daughter off with on the day of her daughter's disappearance, and the location of the apartment where she and her daughter had been living. According to police, the Defendant admitted to lying about her employment and the location of her babysitter's apartment.

2. In the course of investigating the instant case, the Orange County Sheriff's Office impounded the vehicle which the defendant was given by her parents. The vehicle was processed and several items of evidence were discovered inside as a result of this. An air sample from the trunk of the vehicle was tested by experts from the University of Tennessee as was a hair sample also found in the trunk of the vehicle.<sup>1</sup> Additionally, a stain in the trunk has been processed and further tests have indicated the presence of chloroform in the trunk.
3. The vehicle in question continues to be maintained in the custody of the Orange County Sheriff's Office
4. The defendant has hired an expert to conduct similar testing of the vehicle in question in preparation for trial and to rebut the findings of any State experts as regards the testing conducted on the vehicle. The defendant would like her expert to have equal access to her vehicle and all its parts and components as authorities have had, including but not limited to allowing for the car to be placed on a "lift."

### ARGUMENT

Florida Rule of Criminal Procedure 3.220 provides that the State of Florida "shall permit the defendant to inspect, copy, test, and photograph" certain evidence. Namely, the defendant is permitted such access to "any tangible papers or objects that were obtained from or belonged to the defendant," and "any tangible papers or objects that the prosecuting attorney intends to use in the

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<sup>1</sup>The instant case has garnered almost unprecedented media attention. While the media has reported that the tests conducted on the air sample from the trunk of the car by the University of Tennessee has returned results of human decomposition, the defendant has not received any forensic findings from the State to corroborate these reports. The defendant is filing a Motion to Compel these reports and other evidence.

hearing or trial and that were not obtained from or that did not belong to the defendant.” Fla. R. Crim. Proc. 3.220(b)(1)(F) and (K). In addition to the rights accorded an accused pursuant to Florida's criminal procedural rules to examine tangible objects, the Confrontation Clause and Due Process clauses of the United States Constitution also provide the same rights. A right to examine physical evidence is part and parcel of the defendant's right to a full and complete cross-examination of the witnesses who are to be presented against an accused. *Johnson v. State*, 249 So.2d 470, 472 (Fla. 3<sup>rd</sup> DCA, 1971)(it was reversible error to allow a ballistics expert to testify to the markings on a bullet when the state could not produce the bullet for examination by the defendant's own expert). The Fifth federal circuit echoed this conclusion in *Barnard v. Henderson*, 514 F.2d 744 (5<sup>th</sup> Cir. 1975):

Fundamental fairness is violated when a criminal defendant on trial for his liberty is denied the opportunity to have an expert of his choosing, bound by appropriate safeguards imposed by the Court, examine a piece of critical evidence whose nature is subject to varying expert opinion.

*Barard* at 746.

In the instant case it would be a violation of the defendant's Constitutional rights under the Due Process and Confrontation Clauses as well as a violation of her State rights to deny her expert access to this evidence. First, the defendant had a possessory interest in the vehicle as her parents had given it to her and allowed her to drive it for a time. The statute is clear, that such evidence, obtained from the defendant is clearly subject to inspection by the defendant's expert. Thus, even if the prosecution does not intend to use the evidence in a trial against the accused, she is still permitted access to this evidence pursuant to Fla. R. Crim. Proc. 3.220.

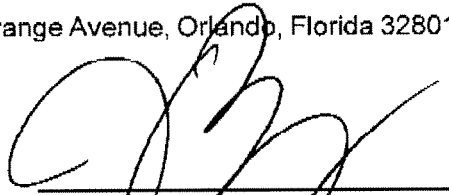
In the event that the State does intend to use this evidence in a trial proceeding against the accused, then the defendant also has a right to have an expert of her choosing inspect and test the evidence. Certainly, evidence that the very daughter the defendant is accused of having neglected may have been dead in the trunk of the defendant's vehicle is a critical fact in a trial for child neglect.

Should the court deny the defendant's expert equal access to this evidence, the State would certainly be violating the defendant's Constitutional rights by making any mention, however slight, of this evidence during trial.

WHEREFORE, for the foregoing reasons, the Defendant respectfully moves this honorable court to enter an order allowing the defense expert access to inspect, test, and photograph the defendant's vehicle and all its components and parts, including but not limited to examination of the vehicle from a "lift", in preparation for trial.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by U.S. Mail and or Fax/hand delivered to the Clerk of the Court at 425 North Orange Avenue, Orlando, Florida, 32801; to Office of the State Attorney at 415 North Orange Avenue, Orlando, Florida 32801, on this the ~~3rd~~ day of ~~September~~, 2008.  
*October*



JOSE A. BAEZ, ESQUIRE  
FL Bar No.: 0013232  
GABRIEL E. ADAM, ESQUIRE  
FL Bar No.: 0027371  
THE BAEZ LAW FIRM  
522 Simpson Road  
Kissimmee, Florida 34744  
Tel.: (407) 705-2626  
Fax: (407) 705-2625

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FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.: 48-2008-CF-0010925-O  
DIVISION: 16

JUDGE: STAN STRICKLAND

CASEY MARIE ANTHONY,

Defendant.

**MOTION TO COMPEL**

**DEPARTMENT OF CHILDREN AND FAMILY RECORDS**

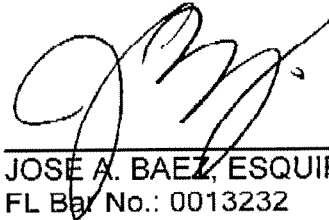
Defendant, CASEY MARIE ANTHONY, by and through the undersigned attorney, respectfully moves this Honorable Court to compel the State of Florida to release to the defense records of any all investigations conducted by the Department of Children and Families in relation to this case. As grounds Defendant states:

1. On July 16, 2008, the Defendant was arrested on charges of providing false information to law enforcement, and child neglect.
2. On August 21, 2008, the Defendant was released from Orange County Jail by posting bail.
3. This case involves the disappearance of a missing child, Caylee Anthony, who is the daughter of the Defendant.
4. Said disappearance, along with the charge of child neglect, has involved the Department of Children and Families with this case.
5. The Defense is entitled to copies of all records of the Department of Children and Families, and that said records are critical to the Defense.
6. In the event that the State of Florida is not in possession of said reports, that the Court grant the Defendant an Order for Subpoena Duces Tecum for said records.

WHEREFORE, Defendant respectfully requests this Honorable Court to grant this motion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing Motion to Compel Response of Discovery has been furnished to the Office of the State Attorney, 415 North orange Avenue, Orlando, Florida 32801 by facsimile delivery on this 3rd day of October, 2008.



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FL Bar No.: 0013232  
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522 Simpson Road  
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NINTH JUDICIAL CIRCUIT, IN AND  
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STATE OF FLORIDA,

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vs.

CASEY MARIE ANTHONY,

Defendant.

CASE NO.: 48-2008-CF-0010925-O  
DIVISION: 16

JUDGE: STAN STRICKLAND

**DEMAND FOR DISCOVERY AND INSPECTION**  
**RELATING TO POLYGRAPHS**

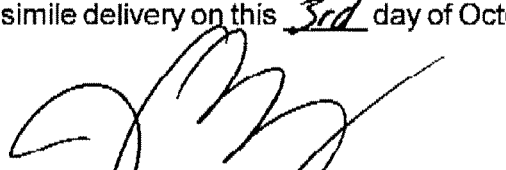
COMES NOW the Defendant, by and through her undersigned counsel, and hereby requests under Rule 3.220(a), Florida Rules of Criminal Procedure, the disclosure of polygraph examinations performed by law enforcement agencies involved in this case. This request applies to all testing that has been, is currently being, or will be performed in the instant case. The request is ongoing. In the event that new materials responsive to this request are produced, discovered, or otherwise come into the possession of the prosecution or its agents, said materials should be provided to the defendant without delay.

1. Names and contact information of each person who has taken, or will be taking a polygraph exam, involved with this case.
2. Names and contact information of each law enforcement agency, law enforcement officer and/or agent acting on behalf of the aforementioned that conducted the polygraph examinations; and personnel records, certifications, experience related documents, and/or training records of the individuals that conducted said polygraphs.
3. Maintenance records, service manuals, factory manuals, model numbers of all polygraph machines and respective equipment used to conduct said polygraph examinations.
4. The polygraph results from each polygraph examination.
  - a. Including all questions asked in said examinations.
  - b. All reported conclusions from said examinations.
  - c. Copies of said results.

WHEREFORE, Defendant respectfully requests this Honorable Court to grant this motion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing Motion to Compel Response of Discovery has been furnished to the Office of the State Attorney, 415 North orange Avenue, Orlando, Florida 32801 by facsimile delivery on this 3rd day of October, 2008.



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THE BAEZ LAW FIRM  
522 Simpson Road  
Kissimmee, Florida 34744  
Tel.: (407) 705-2626  
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FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.: 48-2008-CF-0010925-O  
DIVISION: 16

JUDGE: STAN STRICKLAND

CASEY MARIE ANTHONY,

Defendant.

**MOTION TO COMPEL**

Defendant, CASEY MARIE ANTHONY, by and through the undersigned attorney, respectfully moves this Honorable Court to compel the State of Florida to release to the defense records of any and all information regarding investigations conducted by law enforcement agencies in this case, in relation to Zenaida Gonzalez. As grounds Defendant states:

1. On July 16, 2008, the Defendant was arrested on charges of providing false information to law enforcement, and child neglect.
2. On July 17, 2008, the undersigned attorney submitted a Demand for Discovery.
3. On August 21, 2008, the Defendant was released from Orange County Jail by posting bail.
4. This case involves the disappearance of a missing child, Caylee Anthony, who is the daughter of the Defendant.
5. Said disappearance involves a babysitter/nanny by the name of Zenaida Gonzalez.
6. Law enforcement agencies have declared that they have conducted investigations of individuals of that same name, which may include but not limited to FCIC checks, DMV checks, and other forms of electronic media.
7. The Defense is entitled to copies of all records of said investigations and related documentation, and that said records are critical to the Defense.

WHEREFORE, Defendant respectfully requests this Honorable Court to grant this motion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing Motion to Compel Response of Discovery has been furnished to the Office of the State Attorney, 415 North orange Avenue, Orlando, Florida 32801 by facsimile delivery on this 3rd day of October, 2008.

A handwritten signature in black ink, appearing to read 'Jose A. Baez', is written over a horizontal line. The signature is stylized and cursive.

JOSE A. BAEZ, ESQUIRE  
FL Bar No.: 0013232  
GABRIEL E. ADAM, ESQUIRE  
FL Bar No.: 0027371  
THE BAEZ LAW FIRM  
522 Simpson Road  
Kissimmee, Florida 34744  
Tel.: (407) 705-2626  
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IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.: 48-2008-CF-0010925-O  
DIVISION: 16

JUDGE: STAN STRICKLAND

CASEY MARIE ANTHONY,

Defendant.

**MOTION FOR ALLOWING DEFENDANT TO TRAVEL**  
**TO PLACES OF INTEREST**


COMES NOW the Defendant, CASEY MARIE ANTHONY, by and through undersigned counsel and moves this Honorable Court to enter an Order allowing travel to and from places of interest regarding this case. In support thereof the Defendant would allege that:

1. On July 16, 2008, the Defendant was arrested on charges of providing false information to law enforcement, and child neglect.
2. On August 21, 2008, the Defendant was released from Orange County Jail.
3. This Honorable Court Ordered the Defendant to Community Control / Home Confinement, and the Defendant has complied with all the parameters as Ordered therein.
4. The Defense believes that the Defendant's ability to visit key points of interest in this case will allow greater efforts in helping to assist with the search of missing child, Caylee Anthony.
5. Due to the sensitive nature of this Motion, the Defense requests that the date and time of such travel not be made public.

WHEREFORE the Defendant, CASEY MARIE ANTHONY, prays that this Honorable Court enter an Order allowing the Defendant to Travel to Places of Interest in this matter.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been sent by U.S. Mail and or Fax/hand delivered to the Office of the State Attorney at 415 North Orange Avenue, Orlando, Florida 32801 on this the *3rd* day of October, 2008.



---

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FL Bar No.: 0013232  
GABRIEL E. ADAM, ESQUIRE  
FL Bar No.: 0027371  
THE BAEZ LAW FIRM  
522 Simpson Road  
Kissimmee, Florida 34744  
T: (407) 705-2626 F: (407) 705-2625

IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND  
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,

vs.

CASE NO.: 48-2008-CF-0010925-O  
DIVISION: 16

JUDGE: STAN STRICKLAND

CASEY MARIE ANTHONY,

Defendant.

**MOTION TO COMPEL FLIGHT MANIFEST**

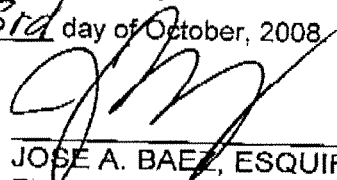
Defendant, CASEY MARIE ANTHONY, by and through the undersigned attorney, respectfully moves this Honorable Court to compel the State of Florida to release to the defense records of any and all information regarding investigations conducted by law enforcement agencies in this case, in relation to the flight manifest of AirTran flight number 862 for the date of July 2<sup>nd</sup>, 2008, originating from Orlando. As grounds Defendant states:

1. On July 16, 2008, the Defendant was arrested on charges of providing false information to law enforcement, and child neglect.
2. On July 17, 2008, the undersigned attorney submitted a Demand for Discovery.
3. On August 21, 2008, the Defendant was released from Orange County Jail by posting bail.
4. This case involves the disappearance of a missing child, Caylee Anthony, who is the daughter of the Defendant.
5. There was a reported sighting of Caylee Anthony, in which the eyewitness alleges that said child boarded flight number 862 on July 2<sup>nd</sup>, 2008, whose destination was Atlanta, Georgia, originating from Orlando.
6. Law enforcement agencies have declared that they have conducted an investigation of the eyewitness' accounts, which include the obtaining of a flight manifest of the aforementioned flight.
7. The Defense is entitled to copies of all records of said investigations and related documentation, and that said records are critical to the Defense.

WHEREFORE, Defendant respectfully requests this Honorable Court to grant this motion.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing Motion to Compel Response of Discovery has been furnished to the Office of the State Attorney, 415 North orange Avenue, Orlando, Florida 32801 by facsimile delivery on this 3rd day of October, 2008.



JOSE A. BAEZ, ESQUIRE

FL Bar No.: 0013232

GABRIEL E. ADAM, ESQUIRE

FL Bar No.: 0027371

THE BAEZ LAW FIRM

522 Simpson Road

Kissimmee, Florida 34744

Tel.: (407) 705-2626

Fax: (407) 705-2625



IN THE CIRCUIT COURT OF THE  
NINTH JUDICIAL CIRCUIT IN AND  
FOR ORANGE COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff,  
vs.

CASE NO.: 48-08-CF-10925-O  
JUDGE: STAN STRICKLAND

CASEY ANTHONY,

Defendant.

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**MOTION TO COMPEL RESULTS OF FORENSIC TESTING**

COMES NOW, the Defendant, CASEY ANTHONY, by and through undersigned counsel and pursuant to Florida Rule of Criminal Procedure 3.220 and moves this Honorable Court to compel the State of Florida and its various police agencies to provide the following:

1. Any tests, reports, logs, and documentation regarding the traces of chloroform allegedly found within the Defendant's vehicle.
2. Any tests, reports, logs, and documentation regarding the hair strand(s) allegedly found within the Defendant's vehicle.
3. Any tests, reports, logs, and documentation regarding the DNA allegedly found within the Defendant's vehicle, residence, and clothing or other items seized by law enforcement agencies.
4. Any tests, reports, logs, and documentation regarding the air sample testing performed by the Body Farm at the University of Tennessee.
5. Any tests, reports, logs, and documentation regarding the cadaver dogs as previously requested in the Defendant's previous pleading, Demand for Discovery and Inspection Relating to Canines and Their Handlers.

In further support of the foregoing Motion to Compel, the defendant would allege as follows:

#### FACTS

On July 29<sup>th</sup>, 2008, the defendant was formally charged with one count of child neglect, a third degree felony, in violation of Fla. Stat. § 827.03(3)(c) and 827.03(3)(a) and one count of Obstructing a Criminal Investigation, a first degree misdemeanor, in violation of Fla. Stat. § 837.055. The charges stemmed from the Defendant's report to local police that her two-year-old daughter had been missing since on or about June 15, 2008.

Law enforcement maintained that during the course of their investigation the Defendant had provided false statements about her employment, the babysitter she claimed she had dropped her daughter off with on the day of her daughter's disappearance, and the location of the apartment where she and her daughter had been living. According to police, the Defendant admitted to lying about her employment and the location of her babysitter's apartment.

In the course of the investigation, the Orange County Sheriff's Office collected and tested evidence found in the vehicle driven by the Defendant. These samples of air, hair and stains were sent to a forensic testing facility and the results have been published to the media.

As of yet, the Defendant has not been provided with the results of this lab testing, any reports prepared in connection with this lab testing or impoundment and chain of custody paperwork for the evidence seized by law enforcement.

### ARGUMENT

Florida Rule of Criminal Procedure 3.220(b)(1) provides that the State shall allow the defendant in a criminal case to "inspect, copy, test, and photograph" the following information:

(J) reports or statement of experts made in connection with the particular case, including results of physical or mental examinations and of scientific tests, experiments, or comparisons . .

Fla. R. Crim. Proc. 3.220(b)(1)(J). Should the court determine after an *in camera* review that "any police or investigative report contains irrelevant, sensitive information or information interrelated with other crimes or criminal activities **and** the disclosure of the contents of the police report may seriously impair law enforcement or jeopardize the investigation of those other crimes or activities, the court may prohibit or partially restrict the disclosure." Fla. R. Crim. Proc. 3.220(b)(2) (emphasis added). Should the state not turn over this discovery to the defense, then the court may prohibit the state from introducing it into evidence at later proceedings. Fla. R. Crim. Proc. 3.220(b)(3).

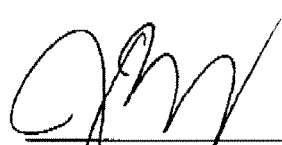
Regardless, the state has a continuing obligation to disclose certain information in its possession to the defense including scientific tests and any tangible evidence it intends to introduce at trial. *McArthur v. State*, 671 So.2d 867 (4<sup>th</sup> DCA, 1996). This includes the obligation to turn over material of which the state is in constructive possession such as evidence in the hands of its agents, including police officers. *Gorham v. State*, 597 So.2d 782 (Fla. 1992). The scope of discovery generally includes any matter or information that appears reasonably calculated to lead to discovery of admissible evidence. *Ivester v. State*, 398 So.2d 926 (1<sup>st</sup> DCA, 1981).

In the instant case, the scientific tests conducted on evidence obtained from the Defendant's vehicle should be disclosed to the Defense. The information is material to the Defendant's case as the State will use this evidence to argue, at the very least, that the Defendant was involved in her daughter's disappearance and therefore guilty of child neglect. The material is not so sensitive that its disclosure will impede or jeopardize investigations of other crimes. Clearly if that were the case, law enforcement would not already have released the results of these tests to the media. The State cannot possibly argue prejudice in this regard. It is troubling that law enforcement would release information to the media without first making that information known to the State Attorney's Office. However, more troubling still, is the notion that the State Attorney's Office would not then pass this information on to the Defendant who must bear the general public's hostility and speculation in the face of scientific test results to which she is not afforded equal access. Essentially, law enforcement or the State Attorney's Office has successfully tried a homicide case against the defendant in the public eye. The Defendant has suffered the public's hatred, the picketers calling her a murderer in front of her own home, the insensitive and scathing assaults by media shows, and the complete disintegration of her privacy without even having access to the same information the media systematically and exclusively receives from law enforcement about her case.

The only way to preserve the fair administration of justice as well as the provisions of Florida Rule of Criminal Procedure 3.220 is for this Court to order the State and its various police agencies to turn over all discovery which it leaks to the media about this case to the defendant as well.

WHEREFORE, based on the foregoing the Defendant respectfully prays that this Honorable Court will order the State to turn over any and all results of scientific tests conducted on items found in the Defendant's car as well as all paperwork associated with these items in possession of law enforcement or experts who have tested said items and any information which law enforcement or the State Attorney's Office deems material enough to turn over to the media in this case.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by U.S. Mail and or Fax/hand delivered to the Office of the State Attorney at 415 North Orange Avenue, Orlando, Florida 32801, this 3rd day of October, 2008.



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