

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

STATE OF FLORIDA,
Plaintiff

Vs.

CASE NO: 2022-CF-000688-A-O

KELLI RENEE LYNCH,
Defendant

NOTICE OF DEMAND FOR DISCOVERY

COMES NOW the Defendant, Kelli Lynch, acting Pro Se in accordance with US Statute 28 U.S.C. § 1654, and pursuant to Florida Criminal Procedure 3.220, hereby files this "Demand For Discovery" expressing the Defendant's intent to participate in the discovery process provided by these rules, including the taking of discovery depositions.

Within 15 days after service of the Notice of Discovery, the prosecutor shall serve written Discovery Exhibit which shall disclose to the defendant and permit the defendant to inspect, copy, test, and photograph under legal obligation all evidence including but not limited to the following information and material within the state's possession or control.

(A) A list of the names and addresses of all persons known to the prosecutor to have information that may be relevant to any offense charged or any defense thereto, or to any similar fact evidence to be presented at trial under section 90.404(2), Florida Statutes. The names and addresses of persons listed shall be clearly designated in the following categories:

(i) Category A. These witnesses shall include (1) eye witnesses, (2) alibi witnesses and rebuttal to alibi witnesses, (3) witnesses who were present when a recorded or unrecorded statement was taken from or made by a defendant or codefendant, which shall be separately identified within this category, (4) investigating officers, (5) witnesses known by the prosecutor to have any material information that tends to negate the guilt of the defendant as to any offense charged, (6) child hearsay witnesses, (7) expert witnesses who have not provided a written report and a curriculum vitae or who are going to testify, and (8) informant witnesses, whether in custody, who offer testimony concerning the statements of a defendant about the issues for which the defendant is being tried.

(ii) Category B. All witnesses not listed in either Category A or Category C.

(iii) Category C. All witnesses who performed only ministerial functions or whom the prosecutor does not intend to call at trial and whose involvement with and knowledge of the case is fully set out in a police report or other statement furnished to the defense;

(B) The statement of any person whose name is furnished in compliance with the preceding subdivision. The term "statement" as used herein includes a written statement made by the person and signed or otherwise adopted or approved by the person and also includes any statement of any kind or manner made by the person and written or recorded or summarized in any writing or recording. The term "statement" is specifically intended to include all police and investigative reports of any kind prepared for or in connection with the case, but shall not include the notes from which those reports are compiled;

(C) Any written or recorded statements and the substance of any oral statements made by the defendant, including a copy of any statements contained in police reports or report summaries, together with the name and address of each witness to the statements;

(D) Any written or recorded statements and the substance of any oral statements made by a codefendant;

(E) Those portions of recorded grand jury minutes that contain testimony of the defendant;

(F) Any tangible papers or objects that were obtained from or belonged to the defendant;

(G) Whether the state has any material or information that has been provided by confidential informant;

(H) Whether there has been any electronic surveillance, including wiretapping, of the premises of the defendant or of conversations to which the defendant was a party and any documents relating thereto;

(I) Whether there has been any search or seizure and any documents relating thereto

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

(K) Any tangible papers or objects that the prosecuting attorney intends to use in the hearing or trial and that were not obtained from or that did not belong to the defendant;

(L) Any tangible paper, objects, or substances in the possession of law enforcement that could be tested for DNA; and

(M) Whether the state has any material or information that has been provided by an informant witness, including:

(i) the substance of any statement allegedly made by the defendant about which the informant witness may testify;

(ii) a summary of the criminal history record of the informant witness;

(iii) the time and place under which the defendant's alleged statement was made;

(iv) whether the informant witness has received, or expects to receive, anything in exchange for his or her testimony;

(v) the informant witness' prior history of cooperation, in return for any benefit, as known to the prosecutor.

(2) If the court determines, in camera, 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.

(3) The court may prohibit the state from introducing into evidence any of the foregoing material not disclosed, so as to secure and maintain fairness in the just determination of the cause.

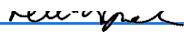
(4) As soon as practicable after the filing of the charging document the prosecutor shall disclose to the defendant any material information within the state's possession or control that tends to negate the guilt of the defendant as to any offense charged, regardless of whether the defendant has incurred reciprocal discovery obligations.

The Defendant demands that the discovery be sent to the following address:

5640 Masters Blvd, Orlando FL 32819

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this document has been furnished by e-portal delivery to the Office of the State Attorney on October 20, 2023.


Oct 20, 2023
Kelli Lynch (Oct 20, 2023 15:26 EDT)
X _____ X _____
KELLI RENEE LYNCH, Date
Defendant

Created:

2023-10-20

By:

James Dameron (euphoricincsocial@gmail.com)

Status:

Signed

Transaction ID:

CBJCHBCAABAAt0-yia1f-FSP56idGxce3TpQTpjYRPto



Lynch- Motion to Demand Discovery

Final Audit Report

2023-10-20

"Lynch- Motion to Demand Discovery" History

Document created by James Dameron (euphoricincsocial@gmail.com)

2023-10-20 - 5:45:18 PM GMT

Document emailed to Kelli Lynch (kellilynch5@gmail.com) for signature

2023-10-20 - 5:46:51 PM GMT

Email viewed by Kelli Lynch (kellilynch5@gmail.com)

2023-10-20 - 5:48:17 PM GMT

Document e-signed by Kelli Lynch (kellilynch5@gmail.com)

Signature Date: 2023-10-20 - 7:26:53 PM GMT - Time Source: server

Agreement completed.

2023-10-20 - 7:26:53 PM GMT