

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR BREVARD COUNTY, FLORIDA

STATE OF FLORIDA,
Plaintiff

CASE NO.: 052019CF028034BXXXXX
JUDGE: LINN

vs.

DAVID ISNARDI,
Defendant

RESPONSE TO DEFENDANT'S DEMAND FOR DISCOVERY, STATE'S
DEMAND FOR NOTICE OF INTENTION TO CLAIM ALIBI, AND STATE'S DEMAND
FOR NOTICE OF DEFENDANT'S INTENTION TO ISSUE SUBPOENA DUCES TECUM

COMES NOW the State of Florida, by and through the undersigned Assistant State Attorney, pursuant to Defendant's Demand for Discovery and pursuant to Fla.R.Crim.P. 3.220, submits the following and hereby demands notice of intention to claim alibi:

1. 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, or to any similar fact evidence to be presented at trial under section 90.404(2), Florida Statutes, are as follows:

CATEGORY A:

JOSE G. AGUIAR
515 GRANT ROAD
PALM BAY, FL 32909

BRIAN ANDERSON
CITY OF PALM BAY
120 MALABAR RD
PALM BAY, FL 32907

AGT SEAN ANDERSON
FEDERAL BUREAU OF INVESTIGATIONS
6767 NORTH WICKHAM ROAD, SUITE 310
VIERA, FL 32940

JEFFREY ALAN BAILEY, JR
130 AIRVIEW AVENUE NE
PALM BAY, FL 32907

JEFF BIRNBACK
SYLINT
240 N. WASHINGTON BLVD, SUITE 600
SARASOTA, FL 34236

THOMAS BO
1190 RAMBLEBROOK ST
MALABAR, FL 32950

JULIE ANN BOTTUM
515 GRANT RD
PALM BAY, FL 32909

AGT COLIN BRUCE
FLORIDA DEPARTMENT OF LAW ENFORCEMENT
1551 COLLEGE PARK BUSINESS CENTER ROAD
ORLANDO, FL 32808

STUART ARTHUR BUCHANAN
PO BOX 1545
TITUSVILLE, FL 32781

WILLIAM CAPOTE
CITY OF PALM BAY
120 MALABAR RD
PALM BAY, FL 32907

DEP CHRISTOPHER CASTIELLO, #242
BREVARD COUNTY SHERIFF'S OFFICE
CID - GUSS HIPPI

COY CLARK
500 RIVER COVE PLACE
INDIALANTIC, FL 32903

DALE DOUGLAS DAVIS
1612 MITCHELL STREET
UNIT 2
MELBOURNE, FL 32901-4459

EDWARD FONTANIN
120 MALABAR RD
PALM BAY, FL 32907

ROGER FORD
1848 HARLOCK ROAD
MELBOURNE, FL 32934

SCOTT GLAUBITZ
312 HARBOR CITY BLVD
MELBOURNE, FL 32901

ANALYST SCOTT GOODLIN
DRUG ENFORCEMENT AGENCY: FORENSICS
5205 NW 84TH AVENUE
MIAMI, FL 33166

AGT DAVID HACKER
FEDERAL BUREAU OF INVESTIGATIONS
6767 NORTH WICKHAM ROAD
WEST MELBOURNE, FL 32904

STEPHEN HAMRICK
581 BORRACLOUGH AVE NW
PALM BAY, FL 32907

AGT KELSEY HARRIS
FEDERAL BUREAU OF INVESTIGATIONS
6767 NORTH WICKHAM ROAD, SUITE 310
VIERA, FL 32940

PEDRO HERNANDEZ
2135 PALM BAY RD
PALM BAY, FL 32905

CALVIN LEWIS HOLTON, III
1729 LA MADERIA DR SW
PALM BAY, FL 32908

TERESE JONES or DESIGNATED CUSTODIAN OF RECORDS
PALM BAY CITY HALL, CITY CLERK
130 MALABAR ROAD SE
PALM BAY, FL 32907

WENDY D. KLEEFISCH
107 FRANKLIN AVENUE
INDIALANTIC, FL 32903

AGT JASON KRIEGSMAN, #402/1049
FLORIDA DEPARTMENT OF LAW ENFORCEMENT
319 RIVEREDGE BOULEVARD, SUITE 214
COCOA, FL 32922

ANDREW LANNON
BOGIN, MUNNS, & MUNNS
1000 LEGION PLACE #1000
ORLANDO, FL 32801

LT GREGORY LATULIPPE, #44
PALM BAY POLICE DEPARTMENT
130 MALABAR ROAD SE
PALM BAY, FL 32907

JERRY LAWSON
380 CINNAMON DR
SATELLITE BEACH, FL 32937

AGT BRADLEY LEWIS, #073/1093
FLORIDA DEPARTMENT OF LAW ENFORCEMENT
500 WEST ROBINSON STREET
ORLANDO, FL 32801

GREGG J LYNK
1309 BRAUN ST NE
PALM BAY, FL 32905

JOHN JOSEPH MAZZIOTTI
415 BRICKELL STREET SE
PALM BAY, FL 32909

BRUCE MOIA
1250 W. EAU GALLIE BLVD
MELBOURNE, FL 32935

JAVIER MOLINARES
400 PASTO CIRCLE
PALM BAY, FL 32909

OFF MARK MYNHEIR, #55
FLORIDA DEPARTMENT OF LAW ENFORCEMENT
319 RIVEREDGE BOULEVARD, SUITE 214
COCOA, FL 32922

VICTORIA NORTHRUP
PALM BAY CHAMBER OF COMMERCE
4100 DIXIE HIGHWAY NE
PALM BAY, FL 32905

DONALD OVERTON
141 AIRVIEW AVE NE
PALM BAY, FL 32907

OFF MARK RENKENS, #108
CONFIDENTIAL ADDRESS
C/O STATE ATTORNEY'S OFFICE

CMR JOHN RESH, #2
PALM BAY POLICE DEPARTMENT
130 MALABAR ROAD SE
PALM BAY, FL 32907

AGT JAMES ROTHE
FEDERAL BUREAU OF INVESTIGATIONS
6767 NORTH WICKHAM ROAD, SUITE 310
MELBOURNE, FL 32940

HARRY SANTIAGO, JR
409 BRECKENRIDGE CIRCLE SE
PALM BAY, FL 32909

AGT THOMAS SLOAN
FEDERAL BUREAU OF INVESTIGATION
6767 NORTH WICKHAM ROAD, SUITE 310
MELBOURNE, FL 32940

OFF JEFFERY SPEARS, #198
PALM BAY POLICE DEPARTMENT
130 MALABAR ROAD SE
PALM BAY, FL 32907

AGT BRIDGETTE TRELA
FEDERAL BUREAU OF INVESTIGATIONS
6767 NORTH WICKHAM ROAD, SUITE 310
VIERA, FL 32940

SHIRLEY WEEMS
WATERMAN REAL ESTATE
828 MALABAR RD SE
PALM BAY, FL 32907

BARNEY WEISS
CITY OF PALM BAY
120 MALABAR RD
PALM BAY, FL 32907

DEP MICHAEL JASON WEST, #204
BREVARD COUNTY SHERIFF'S OFFICE
SOUTH

ROBERT WILLIAMS
1419 TURKEY CREEK DR.
WEST MELBOURNE, FL 32904

CATEGORY B:

CATEGORY C:
DEBORAH THOMAS
PO BOX 999
TITUSVILLE, FL 32781

This list of witnesses is not necessarily limited to those named but also includes any witnesses mentioned in any material made available for defendant's discovery pursuant to Fla.R.Crim.Pro. 3.220.

2. The undersigned Assistant State Attorney has indicated "Yes" below for each subparagraph listing items in the State's possession or control. The same are available for your inspection, copying, testing or photographing at the office of the undersigned upon timely and reasonable notice made to the undersigned. If you desire to copy and/or photograph same, copies will be provided upon signed receipt for same. The name(s) of confidential informant(s) will not be supplied unless the State intends to use same as witness(es) at the trial or unless required by court order after notice and hearing.

You must give the undersigned 48 hours (excluding weekends and holidays) written notice of the time you will appear for inspection of the disclosures herein and set the time for the same between 8:30 a.m. and 5:00 p.m. any regular business day.

a. Statements given by person(s) listed in Paragraph 1 above.

☒ Yes ☐ None

b. Written, recorded and/or oral statements of defendant.

☒ Yes ☐ None

- **ANY ADMISSIONS/STATEMENTS MADE BY DEFENDANT AND CONTAINED OR REFERENCED IN ANY REPORT, AUDIO TAPE, OR VIDEO TAPE**
- **REFER TO ALL DISCOVERY AND STATEMENTS CONTAINED IN RECORDED INTERVIEW ON CD/DVD**

c. Written, recorded and/or oral statements of co-defendants.

☒ Yes ☐ None

d. Recorded Grand Jury Testimony of defendant.

☐ Yes ☒ None

e. Tangible papers or objects obtained from or belonging to defendant.

☒ Yes ☐ None

f. Material or information provided by confidential informant.

☒ Yes ☐ None

g. Electronic surveillance of premises of defendant or of conversations to which defendant was a part.

☒ Yes ☐ None

- **AUDIO RECORDING(S)**
- **VIDEO RECORDING(S)**

h. Search and seizure.

☒ Yes ☐ None

i. Documents related thereto.

☒ Yes ☐ None

j. Reports or statements of experts.

☒ Yes ☐ None

CHEMISTRY NAME: SCOTT GOODLIN (DEA)

**IDENTIFICATION OF DRUGS AND DRUG PARAPHERNALIA NAME: ALL
OFFICERS / SPECIAL AGENTS / DEPUTIES WITH THE FBI, FDLE, DEA, BREVARD
COUNTY SHERIFF'S OFFICE AND PALM BAY PD**

k. Tangible papers or objects not obtained from or belonging to defendant which the
State intends to use at hearing or trial.

☒ Yes ☐ None

- **CERTIFIED COPIES OF DEFENDANT'S AND CODEFENDANT'S PRIOR CONVICTION(S)**
- **923.01 RE: ARREST**
- **ARREST WARRANT AFFIDAVIT / ARREST WARRANT**
- **FDLE INVESTIGATIVE SUMMARY → 17 PAGES**
- **FDLE CASE RELATED ITEMS PRINT → 6 PAGES**
 - **DESCRIBES INV-1 THROUGH INV-47 WHICH ARE LISTED BELOW**
- **PARTIAL FBI TRANSCRIPTS OF THE FOLLOWING RECORDINGS**
 - **1D1 → 9/12/2015**
 - **1D2 → 9/17/2015**
 - **1D5 → 11/5/2015**
 - **1D9 → 12/20/2015**
 - **1D12 → 1/12/2016**
- **DVD → INTERVIEW OF ISNARDI**
- **CERTIFIED AUDIO / VIDEO & MINUTES OF PALM BAY CITY COUNCIL MEETINGS**
 - **9/17/2015**
 - **6/2/2016**
 - **6/16/2016**
- **PALM BAY PD CASE REPORT #19-6386**
 - **NARRATIVE #2 BY SPEARS**
 - **LETTER BY STUART BUCHANAN DATED 6/12/2019**
 - **AUDIO / VIDEO INTERVIEW STUART BUCHANAN DATED 6/19/2019**
- **JOSE AGUIAR CERTIFIED CONVICTIONS → 30 PAGES**
- **FLORIDA TODAY NEW ARTICLE "FBI INFORMANT TALKS OF HIS ROLE IN CRACKING PALM BAY CORRUPTION CASE" → 4 PAGES**
- **EMAIL FROM BUCHANAN DATED 7/10/2019**

- **ETHICS COMPLAINT AGAINST ANDY ANDERSON DATED 5/14/2019 → 4 PAGES**
- **BREVARD COUNTY PROPERTY APPRAISER MAP → 1 PAGE**
- **PALM BAY ZONING PACKET → 17 PAGES**
- **CONTRACT AND CANCELLATION OF CONTRACT FOR SALE FOR WINDHAM DRIVE SW PALM BAY, FL PORT MALABAR UNIT 51 TRACT Q**
- **BREVARD COUNTY CERTIFIED AUDIO/VIDEO & MINUTES OF BREVARD COUNTY COMMISSION MEETING 11/5/2015**

FDLE “INV” DIGITAL MEDIA

DVD Number	FDLE #
1	INV - 2
	INV - 3
	INV - 4
	INV - 5
2	INV - 6
3	INV - 8
4	INV - 9
5	INV - 10
See FDLE	INV - 11
6	INV - 12
	INV - 13
	INV - 14
	INV - 15
7	INV - 15
8	INV - 17
9	INV - 18
10	INV - 20
11	INV - 21
12	INV - 23
13	INV - 24
14	INV - 25
15	INV - 26
See FDLE	INV - 27
16	INV - 28
17	INV - 29

18	INV - 30 INV - 31
19	INV - 32
20	INV - 36
21	
22	INV - 39
23	INV - 40
24	INV - 41
See FDLE	INV - 42
25	
26	INV - 43
27	INV - 44
28	INV - 45

FDLE “INV” DOCUMENTS

FDLE #
INV-1
INV-7
INV - 16
INV - 19 (see FDLE)
INV - 22
INV - 33
INV - 34
INV - 35
INV - 37
INV - 38
INV - 42
INV - 44
INV - 46
INV - 47

FDLE INVESTIGATIVE REPORTS BY BRADLEY LEWIS

Investigative Report Serial #	Date	Pages
1	2/17/2017	3
2	5/2/2017	3
3	5/3/2017	1
4	5/4/2017	3
5	5/4/2017	2
6	5/12/2017	4
7	5/17/2017	1
8	5/26/2017	3
9	5/26/2017	2
10	6/1/2017	3
11	6/1/2017	1
12	5/5/2017	1
13	5/30/2017	3
14	6/5/2017	2
15	6/6/2017	3
16	5/30/2017	3
17	6/23/2017	3
18	8/1/2017	2
19	7/31/2017	2
20	8/4/2017	2
21	8/4/2017	2
22	8/4/2017	1
23	8/8/2017	2
24	8/14/2017	2
25	9/6/2017	1
26	9/20/2017	1
27	9/7/2017	1
28	9/21/2017	2
29	10/10/2017	2
30	10/16/2017	1
31	10/4/2017	2
32	10/19/2017	2
33	1/24/2018	2
34	11/10/2017	4
35	4/8/2018	3
36	4/15/2018	2
37	5/1/2018	2

38	5/3/2018	3
39	4/29/2018	3
40	5/9/2018	2
41	5/21/2018	2
42	6/4/2018	2
43	5/9/2018	1
44	6/25/2018	2
45	7/11/2018	3
46	7/24/2018	2
47	8/7/2018	2
48	8/9/2018	2
49	8/13/2018	2
50	8/9/2018	2
51	8/25/2018	1
52	8/6/2018	2
53	9/7/2018	2
54	10/3/2018	2
55	10/17/2018	3
56	11/7/2018	2
57	5/9/2019	1

FBI REPORTS

	Report Written By:	Date	Type of Report	# of Pages
1	Bridgette Trela	9/9/2015	Electronic Communication	3
2	Bridgette Trela	9/14/2015	Import Form	1
3	Amanda Knox	10/21/2015	Electronic Communication	2
4	Kevin Shea	10/30/2015	Import Form	1
5	Bridgette Trela	11/4/2015	Electronic Communication	2
6	Bridgette Trela	10/2/2015	Import Form	1
7	Kevin Shea	11/12/2015	Electronic Communication	7
8	Kevin Shea	11/23/2015	Import Form	1
9	Thomas Slone	10/8/2015	Electronic Communication	2
10	Thomas Slone	11/4/2015	Case report	1

11	Thomas Slone	11/9/2015	Electronic Communication	2
12	Bridgette Trela	12/3/2015	Electronic Communication	2
13	Kevin Shea	12/3/2015	Import Form	4
14	Kevin Shea	11/18/2015	Electronic Communication	2
15	Amanda Knox	11/12/2015	Electronic Communication	2
16	Thomas Slone	11/9/2015	Electronic Communication	1
17	Jorge Rivera	11/17/2015	Complaint Form	28
18	Kevin Shea	12/9/2015	Electronic Communication	3
19	Kevin Shea	12/30/2015	Import Form	2
20	Kevin Shea	1/4/2016	Electronic Communication	5
21	Kevin Shea	1/19/2016	Electronic Communication	5
22	Crystal Rowe	1/20/2016	Evidence Entry	2
23	Christopher Castiello	1/13/2016	Filing and Security	3
24	unknown	unknown	eAgent report	4
25	Scott W. Goodlin, Senior Forensic Chemist	10/18/2016	DEA Chemical Analysis Report	1
26	Scott W. Goodlin, Senior Forensic Chemist	12/16/2016	DEA Chemical Analysis Report	1
27	Christopher Castiello	1/13/2016	Case report	1
28	Michael Alfieri	1/25/2016	Collected Item Log	1
29	Christopher Castiello, Michael Hill	1/27/2016	Case report	1
30	Michael Hill, Mathew Pagliarini	1/27/2016	Case report	1

31	John Farrell	7/18/2016	Electronic Communication	2
32	Sean Andersen	10/27/2017	Import Form	1
33	Bridgette Trela	12/19/2016	Case report	1
34	Bridgette Trela	6/14/2017	Case report	3
35	Bridgette Trela	1/11/2017	Electronic Communication	2
36	Leslie Nelson	2/23/2017	Import Form	1
37	Bridgette Trela	2/17/2017	Liaison with an Organization Outside of the FBI	2
38	Bridgette Trela	3/13/2017	Case report	1
39	James Rothe	3/10/2017	Case report	1
40	Bridgette Trela	3/14/2017	Electronic Communication	2
41	Bridgette Trela	4/14/2017	Case report	1
42	Kevin Shea	7/6/2017	Electronic Communication	4
43	Sean Andersen	10/4/2017	Case report	1
44	Kevin Shea	6/1/2017	Electronic Communication	3
45	Bridgette Trela	6/23/2017	Case report	1
46	Bridgette Trela	2/17/2017	Liaison with an Organization Outside of the FBI	2
47	Kenneth Mitchell	6/2/2017	Collected Item Log	6
48	Bridgette Trela	6/19/2017	Case report	2
49	Bridgette Trela	8/21/2017	Case report	12
50	Bridgette Trela	6/12/2017	Case report	5
51	Bridgette Trela	8/15/2017	Case report	2
52	Sean Andersen	8/15/2017	Case report	2
53	Sean Andersen	9/6/2017	Case report	1
54	Sean Andersen	9/25/2017	Case report	1
55	Sean Andersen	9/18/2017	Case report	1
56	Sean Andersen	10/6/2017	Case report	2
57	Sean Andersen	10/17/2017	Case report	1
58	Mathew Pagliarini	6/1/2017	Case report	1

59	Kevin Shea	5/30/2017	Electronic Communication	3
60	Sean Andersen	10/3/2017	Case report	1
61	Sean Andersen	5/16/2018	Case report	2
62	Sean Andersen	4/19/2018	Electronic Communication	2
63	Sean Andersen	2/6/2018	Electronic Communication	3
64	Sean Andersen	5/16/2018	Case report	1

CHS (Confidential Human Source) Reports

	Report Written By:	Date	# of Pages
1	Bridgette Trela	9/3/2015	2
2	Bridgette Trela	9/1/2015	2
3	Bridgette Trela	9/3/2015	2
4	Bridgette Trela	9/10/2015	2
5	Bridgette Trela	9/12/2015	1
6	Bridgette Trela	9/17/2015	1
7	Bridgette Trela	9/18/2015	1
8	Bridgette Trela	9/18/2015	1
9	Bridgette Trela	9/23/2015	2
10	Bridgette Trela	9/25/2015	3
11	Bridgette Trela	9/29/2015	1
12	Bridgette Trela	10/7/2015	1
13	Bridgette Trela	11/2/2015	1
14	Bridgette Trela	11/2/2015	1
15	Bridgette Trela	11/3/2015	2
16	Bridgette Trela	11/13/2015	2
17	Bridgette Trela	11/14/2015	1
18	Bridgette Trela	11/20/2015	1
19	Bridgette Trela	11/25/2015	2
20	Bridgette Trela	12/12/2015	2
21	Bridgette Trela	8/11/2017	2
22	Bridgette Trela	2/9/2016	2
23	Bridgette Trela	12/20/2015	2
24	Bridgette Trela	5/2/2016	1
25	Bridgette Trela	5/6/2016	1
26	Bridgette Trela	5/17/2016	1
27	Bridgette Trela	5/31/2016	1

28	Bridgette Trela	1/21/2016	2
29	Bridgette Trela	1/25/2016	1
30	Bridgette Trela	3/7/2016	1
31	Bridgette Trela	3/7/2016	2
32	Bridgette Trela	2/11/2016	1
33	Bridgette Trela	2/29/2016	1
34	Bridgette Trela	4/14/2016	2
35	Bridgette Trela	3/14/2016	1
36	Bridgette Trela	4/29/2016	3
37	Bridgette Trela	5/5/2016	1
38	Sean Andersen	5/6/2016	1
39	Bridgette Trela	6/6/2016	1
40	Bridgette Trela	6/6/2016	1
41	Bridgette Trela	7/6/2016	1
42	Bridgette Trela	7/6/2016	1
43	Bridgette Trela	7/6/2016	2
44	Bridgette Trela	7/6/2016	2
45	Sean Andersen	6/20/2016	1
46	Bridgette Trela	7/1/2016	1
47	Bridgette Trela	7/6/2016	2
48	Bridgette Trela	8/12/2016	1
49	Bridgette Trela	8/15/2016	3
50	Bridgette Trela	8/19/2016	1
51	Bridgette Trela	8/23/2016	1
52	Bridgette Trela	8/23/2016	2
53	Bridgette Trela	8/26/2016	2
54	Bridgette Trela	10/3/2016	1
55	Bridgette Trela	10/6/2016	2
56	Bridgette Trela	8/26/2016	2
57	Bridgette Trela	10/18/2016	1
58	Bridgette Trela	10/26/2016	2
59	Bridgette Trela	11/7/2016	2
60	Bridgette Trela	11/10/2016	1
61	Bridgette Trela	11/25/2016	2
62	Bridgette Trela	12/16/2016	2
63	Bridgette Trela	12/16/2016	1
64	Bridgette Trela	12/16/2016	2
65	Bridgette Trela	11/7/2016	2
66	Bridgette Trela	10/26/2016	1
67	Bridgette Trela	10/26/2016	2

68	Bridgette Trela	8/23/2016	2
69	Bridgette Trela	2/7/2017	2
70	Bridgette Trela	2/1/2016	2
71	Bridgette Trela	2/1/2016	1
72	Bridgette Trela	2/1/2016	1
73	Bridgette Trela	2/5/2016	1
74	Bridgette Trela	2/5/2016	1
75	Bridgette Trela	2/9/2016	1
76	Bridgette Trela	2/9/2016	2
77	Bridgette Trela	2/24/2016	1
78	Bridgette Trela	2/24/2016	1
79	Bridgette Trela	4/15/2016	1
80	Bridgette Trela	2/6/2016	1
81	Bridgette Trela	3/7/2016	1
82	Bridgette Trela	4/15/2016	1
83	Bridgette Trela	4/11/2016	1
84	Bridgette Trela	8/11/2017	2
85	Bridgette Trela	4/15/2016	2
86	Bridgette Trela	4/29/2016	3
87	Bridgette Trela	4/29/2016	3
88	Bridgette Trela	7/6/2016	2
89	Bridgette Trela	5/5/2016	1
90	Bridgette Trela	8/2/2017	1
91	Bridgette Trela	1/31/2017	3
92	Bridgette Trela	2/8/2017	2
93	Sean Andersen	3/2/2017	2
94	Bridgette Trela	3/9/2017	1
95	Bridgette Trela	3/9/2017	1
96	Sean Andersen	3/21/2017	2
97	Bridgette Trela	6/20/2017	2
98	Bridgette Trela	6/20/2017	2
99	Sean Andersen	8/28/2017	2
100	Sean Andersen	9/1/2017	1
101	Sean Andersen	9/15/2017	1
102	Sean Andersen	9/19/2017	1
103	Sean Andersen	10/3/2017	1
104	Sean Andersen	9/29/2017	1
105	Sean Andersen	9/29/2017	2
106	Sean Andersen	10/10/2017	1
107	Sean Andersen	10/17/2017	2

108	Sean Andersen	10/18/2017	1
109	Sean Andersen	10/20/2017	2
110	Sean Andersen	10/24/2017	2
111	Sean Andersen	10/25/2017	2
112	Sean Andersen	10/11/2017	3
113	Sean Andersen	10/27/2017	2
114	Sean Andersen	10/30/2017	1
115	Sean Andersen	11/28/2017	1
116	Sean Andersen	11/29/2017	1
117	Sean Andersen	12/12/2017	2
118	Sean Andersen	12/18/2017	2
119	Sean Andersen	12/19/2017	1
120	Sean Andersen	12/21/2017	1
121	Sean Andersen	2/20/2018	3
122	Sean Andersen	1/11/2018	2
123	Sean Andersen	2/6/2018	1
124	Sean Andersen	2/13/2018	1
125	Sean Andersen	3/26/2018	2
126	Sean Andersen	12/6/2017	1
127	Sean Andersen	4/24/2018	1
128	Sean Andersen	4/26/2018	2
129	Sean Andersen	5/14/2018	1
130	Sean Andersen	11/21/2017	1
131	Sean Andersen	1/9/2018	1
132	Sean Andersen	1/22/2018	2
133	Sean Andersen	2/13/2018	1
134	Sean Andersen	3/6/2018	1
135	Sean Andersen	3/22/2018	1
136	Sean Andersen	4/9/2018	1
137	Sean Andersen	4/19/2018	1
138	Sean Andersen	5/9/2018	1

CONFIDENTIAL RECORDINGS

CD#
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1d6 2 CDs
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IF THIS IS A PALM BAY POLICE DEPARTMENT CASE WITH IN-CAR VIDEO RECORDING(S), CONTACT PALM BAY POLICE DEPARTMENT RECORDS DIVISION AT PDRECORDS@PBFL.ORG AND/OR (321) 952-3461 TO OBTAIN A COPY OF SUCH RECORDING(S).

l. Tangible paper, objects or substances in the possession of law enforcement that could be tested for DNA.

☒ Yes ☐ None

m. Material or information provided by informant witness.

☒ Yes ☐ None

(i) SUBSTANCE OF DEFENDANT'S STATEMENT TO INFORMANT: Please see confidential recordings, FDLE reports, FBI reports and CHS Source Reports

(ii) SUMMARY OF CRIMINAL HISTORY OF INFORMANT: Felony convictions approximately 30 years ago, Pre-Trial Diversion Battery DV / Criminal Mischief 2018

(iii) TIME AND PLACE UNDER WHICH DEFENDANT'S ALLEGED STATEMENT WAS MADE: Please see confidential recordings, FDLE reports, FBI reports and CHS Source Reports

(iv) HAS THE INFORMANT RECEIVED OR DOES THE INFORMANT EXPECT TO RECEIVE ANYTHING IN EXCHANGE FOR TESTIMONY? ☒ YES ☐ NO

(v) INFORMANT'S PRIOR HISTORY OF COOPERATION IN RETURN FOR ANY BENEFIT, KNOWN TO THE PROSECUTOR: Informant has cooperated with the FBI and the FDLE as a paid informant.

3. All tangible objects as provided by Fla. R. Crim. P. 3.220(b)(1)F, K, and L, may be inspected, photographed, copied and tested during regular and ordinary business hours at:

a. STATE ATTORNEY'S OFFICE / BREVARD CLERK OF COURTS

b. FLORIDA DEPARTMENT OF LAW ENFORCEMENT

c. FEDERAL BUREAU OF INVESTIGATIONS

- d. DRUG ENFORCEMENT AGENCY
- e. PALM BAY POLICE DEPARTMENT

This document will serve as authorization for below addressee, the attorney for the defendant, or his designated representative to conduct the said discovery of tangible objects, in the above-styled cause, with reference to agencies case numbers as follows. Note: if the Florida Department of Law Enforcement (Crime Lab) is listed in paragraph 3.c., *above*, then discovery is limited to the approved/final lab report(s) for the FDLE number listed below:

- a. # 052019CF028034BXXXXX / 052019CF028034BXXXXX
 - b. # OR-14-0134
 - c. # FD-1023, 281F-TP-6640245, 194A-TP-4989906
 - d. #2016-SFL4-01094 / 2016-SFL4-01095
 - e. #19-6386
4. The State has herein submitted its witness list and expects the defense to submit its corresponding witness list within fifteen (15) days as provided in Fla. R. Crim. P. 3.220(d)(1). It is requested that defense disclosures of witness statements, reports of experts and tangible papers and objects to be made at the time you appear for inspection of items detailed in Paragraph (2) above, but in no case later than 15 days from the time you inspect the State's evidence.
5. The State furnishes the following particulars:
- a. As specifically as is known to the State, the offense was committed by the defendant, DAVID ISNARDI
 - b. The place of the crime(s) charged was in Brevard County, Florida.
 - c. The defendant is charged as a principal in the first degree as defined by Section 777.011 of the Florida Statutes.
6. The State has supplied the above Particulars without requiring a Court Order, as set out in RCrP 3.140(n). Any other Particulars requested, if not already disclosed by other Discovery submitted, will be submitted only if ordered by the Court, as the Rule provides.

7. Under Rule 3.200, Florida Rules of Criminal Procedure, if you intend to offer evidence of an alibi in your defense, you are hereby required to serve upon me, the undersigned Assistant State Attorney for the Eighteenth Judicial Circuit, in and for Brevard County, Florida, not less than ten (10) days before trial or at such time as the Court may direct, a notice in writing of your intention to claim alibi, which said notice shall contain specific information as to the place at which you claim to have been at the time of the alleged offense and, as particularly as it is known to you or your attorney, the names and addresses of the witnesses through whom you propose to establish such alibi. You are under a continuing duty to disclose promptly to me the names and addresses of any additional witnesses which may come to your attention subsequent to the filing of your witness list.

If you fail in any particular to comply with the provisions of said Rule 3.200 a motion will be made to exclude any and all evidence, except your own testimony, offered by you for the purpose of proving an alibi.

8. **STATE'S DEMAND FOR NOTICE OF DEFENDANT'S INTENTION TO ISSUE SUBPOENA DUCES TECUM PURSUANT TO FLA.R.CRIM.P. 3.220(h)(1), and FLA.R.CIV.P. 1.310 AND 1.351.** The State demands notice of intention to issue subpoena duces tecum pursuant to Fla.R.Crim.P. 3.220(h)(1), Fla.R.Civ.P. 1.310 and 1.351:

- a. Fla.R.Crim.P. 3.220(h)(1) provides that "the procedure for taking the deposition, the scope of examination, and the issuance of a subpoena for deposition by an attorney of record in the action, shall be the same as provided in the Florida Rules of Civil Procedure."
- b. Fla.R.Civ.P. 1.310(b)(1) provides that "a party desiring to take the deposition of any person upon oral examination shall give reasonable notice in writing to every other party to the action. . . . If a subpoena duces tecum is to be served on the person to be examined, the designation of the materials to be produced under the subpoena shall be attached to or included in the notice."
- c. Fla.R.Civ.P. 1.351 "provides the exclusive procedure for obtaining documents or things by subpoena from nonparties. . . without deposing the custodian or other person in possession of the documents." Fla.R.Civ.P. 1.351(b) specifically states that "a party desiring production under [said] rule shall serve notice as provided in rule 1.080 on every other party of the intent to serve a subpoena under [said] rule at least 10 days before the subpoena is issued if service is by delivery and 15 days before the subpoena is issued if the service is by mail or email."

Thus, pursuant to the above-referenced rules of procedure, the State demands that the defense comply with said rules and provide proper notice of its intention to issue any subpoenas duces tecum for deposition, with or without oral testimony, in this case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by **E-MAIL** to KEPLER B. FUNK ESQUIRE, Attorney for Defendant, at **KEP@FSDCRIMLAW.COM**, **RECEPTIONIST@FSDCRIMLAW.COM** this 29th day of August, 2019.

PHIL ARCHER
STATE ATTORNEY

BY: /S/ Kathryn M. Speicher
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ASSISTANT STATE ATTORNEY
FLORIDA BAR NO. 0021855
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