IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
IN AND FOR SARASOTA COUNTY, STATE OF FLORIDA

STATE OF FLORIDA

CLERK NO: 2023CF006262NC

vs

MARY SUE COWLING /

STATE'S DISCOVERY EXHIBIT AND WITNESS LIST

Pursuant to Florida Rule of Judicial Administration 2.420 and Florida Constitution Article 1 Section 16, I hereby certify:

That I am filing a Discovery Exhibit that may contain confidential information as described in Rule 2.420 and/or Florida Constitution Article 1 Section 16 including but not limited to:
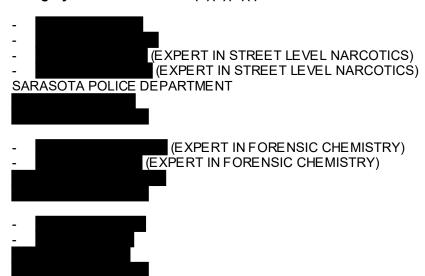
- Social Security, bank accounts, charge, debit, and credit card numbers. Fla. Stat. 119.0714(1)(i)-(j), 2(a)-(e)

- Victim's address and identifying information. Fla. Stat. 741.30(3)(b) and Florida Constitution Article 1, Section 16(b)(5)

- Information identifying victims of sexual offenses, including child sexual abuse. Fla. Stat. 119.071(2)(h), Fla. Stat. 119.0714(1)(h), and Florida Constitution Article 1, Section 16(b)(5)

- Information which reveals the identity of the victim of the crime of child abuse. Fla Stat. 119.071(2)(h), Fla. Stat. 119.0714(1)(h), and Florida Constitution Article 1, Section 16(b)(5)

- Information or records that could locate or harass a victim or a victim's family, or which could disclose confidential or privileged information of a victim. Florida Constitution Article 1, Section 16(b)(5)

  DISCLOSURE OF ANY OF THIS INFORMATION, INCLUDING TO A CRIMINAL DEFENDANT, MAY VIOLATE ARTICLE 1 SECTION 16 OF THE FLORIDA CONSTITUTION.

DISCOVERY - FELONY - *EFILE*

THE STATE OF FLORIDA, by the undersigned, pursuant to Defendant's Notice of Discovery pursuant to Rule 3.220 Fla. R. Crim. P., submits the following information:

1. Names and addresses of persons with information relevant to any offense charged or to any similar fact evidence to be presented at trial under Section 90.404(2), Florida Statutes: 3.220(b)(1)(A)

   Category A Witnesses: 3.220(b)(1)(A)(i)

   - ███████████
   - ███████████
   - ███████████ (EXPERT IN STREET LEVEL NARCOTICS)
   - ███████████ (EXPERT IN STREET LEVEL NARCOTICS)
   SARASOTA POLICE DEPARTMENT
   ███████████

   - ███████████ (EXPERT IN FORENSIC CHEMISTRY)
   - ███████████ (EXPERT IN FORENSIC CHEMISTRY)
   ███████████

   - ███████████
   - ███████████
   ███████████

2. Written verbatim witness statements including police reports: 3.220(b)(1)(B)

   ☒ PCA
   ☐ VICTIM/WITNESS AFFIDAVIT(S)　　　☒ OFFENSE/INCIDENT REPORT(S)
   ☒ PROPERTY/EVIDENCE RECEIPTS
   ☒ BODY CAMERA RECORDINGS (EVIDENCE.COM <u>DOWNLOAD LINK</u> PROVIDED)

3. Defendant's oral or written statements and names and addresses of all witnesses to statements: 3.220(b)(1)(C)

   ☒ SEE ALL ITEMS IN #2

4. Co-defendant's oral or written statements in joint trial: 3.220(b)(1)(D)

   ☒ SEE ALL ITEMS IN #2

5. Grand Jury testimony of the defendant: 3.220(b)(1)(E)

   N/A

6. Tangible papers or objects obtained from or belonging to defendant: 3.220(b)(1)(F)

   ☒ SEE ALL ITEMS IN PROPERTY RECIEPT

7. Whether State has any material or information provided by a confidential informant: 3.220(b)(1)(G)

   ☒ N/A

8. Whether State has used electronic surveillance, including wiretapping, of the premises of defendant or of conversations to which defendant was a party and any documents relating thereto: 3.220(b)(1)(H)

☒ N/A

9.   Whether there has been a search and seizure (with documents, if any): 3.220(b)(1)(I)

☒ YES, SEE #6

10.   Experts reports and statements: 3.220(b)(1)(J)

☒ LAB ANALYSIS

11.   Tangible papers and objects to be used at hearing or trial, not obtained from or belonging to defendant: 3.220(b)(1)(K)

☒ SEE ALL ITEMS IN #2 THRU #10
☒ LAB ANALYSIS
☒ EVENT CHRONOLOGY
☒ BODY CAMERA RECORDINGS (EVIDENCE.COM <u>DOWNLOAD LINK</u> PROVIDED)

12.   Whether State has any tangible paper, objects, or substances in the possession of law enforcement that could be tested for DNA: 3.220(b)(1)(L)

☒ SEE ALL ITEMS IN #2 AND #6

13.   The prosecution ☐ has ☒ has no material information tending to negate the Defendant's guilt: 3.220(b)(4).

**Please contact the undersigned Assistant State Attorney to coordinate an appointment to view any evidence that is retained in Property/Evidence.

<u>**CERTIFICATE OF SERVICE**</u>

     I HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic service to: PETER COEN, PLEADINGS12@RC2FL.COM,PCOEN@RC2FL.COM this 17th day of October, 2023.

ED BRODSKY, STATE ATTORNEY
TWELFTH JUDICIAL CIRCUIT

By: _____
     CHARLES DEMCHAK
     Assistant State Attorney
     Florida Bar #: 1002957
     2071 RINGLING BLVD STE 400
     SARASOTA, FL 34237-7036
     (941) 861-4447
     E-SERVICE: saorounds@sao12.org