

**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.

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)

- KASEY DOUGAN
- CODY STANALAND
- CLIFTON BISHOP (EXPERT IN STREET LEVEL NARCOTICS)
- JAMIE MORRISON (EXPERT IN STREET LEVEL NARCOTICS)

SARASOTA POLICE DEPARTMENT
2099 ADAMS LANE
SARASOTA, FL 34237

- NANCY LUDWIGSEN (EXPERT IN FORENSIC CHEMISTRY)
- ALISON KAKSEY (EXPERT IN FORENSIC CHEMISTRY)

6010 CATTLERIDGE DR
SARASOTA, FL 34232

- SCOTT HAMAYDI

- EDWARD NEFF
507 KUMQUAT CT
SARASOTA, FL 34236

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 DOWNLOAD LINK 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 RECEIPT

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 DOWNLOAD LINK 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.**

CERTIFICATE OF SERVICE

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
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