

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

STATE OF FLORIDA,
Plaintiff

CASE NO.: 592014CF003245AXXXXXX

vs.

JOSHUA GALIN ORTIZ,
Defendant

RESPONSE TO DEFENDANT'S DEMAND FOR DISCOVERY

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:

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 – An “*” next to the name of a witness indicates the witness was present for a statement of the defendant.

CHARLES ALBRECHT
BLAYNE BADURA
STEPHEN E BREEDLOVE
ERIC BROTHERS
DANIEL CARRERO
ANTHONY FIORE
DEBBIE GALUTZ
JACQUINE GROSSI
ROBERT JAYNES
VINCENT KAUFFMAN
RICHARD KOLENTUS
DAVID KOO
CHAD MCDANIEL
JOHN MONK
EVAMARIE MULTARI
MATTHEW PARKER
SONIA PISANO
LINDEN JOE RICE *
CELINE RIOS
SPENCER SHELDON

JENNIFER SPEARS *
EDDIE WALKER
SEMINOLE COUNTY SHERIFF'S OFFICE
100 BUSH BOULEVARD
SANFORD, FL 32773

CHRISTOPHER BAKER
KEVIN MAXWELL
SEMINOLE COUNTY FIRE RESCUE
150 BUSH BOULEVARD
SANFORD, FL 32773

TIMOTHY GALLAGHER, M D
MEDICAL EXAMINER'S OFFICE
1360 INDIAN LAKE ROAD
DAYTONA BEACH, FL 32124

JOSE DUGUE *
GREG HAHN
JACOB RUFF
JEREMY VOGT
MARYLAND STATE POLICE
7777 WASHINGTON BOULEVARD
JESSUP, MARYLAND 20794

FRANKLYN STATION
BALTIMORE COUNTY POLICE DEPARTMENT
PUBLIC SAFETY BUILDING
700 EAST JOPPA ROAD
TOWSON, MARYLAND 21286

TANGELA MAYO
ELIZABETH JENKINS
JAMES LOCKE *
HOWARD COUNTY DEPARTMENT OF CORRECTIONS
7301 WATERLOO ROAD
JESSUP, MARYLAND 20794

ANNE ANTHONY
3270 NATOMA WAY
ORLANDO, FL 32825

JANIECE AQUINO *
2229 BACKWATER COURT
OVIEDO, FL 32765

CHEREE BURCH *
1303 WEST 7TH ST.
SANFORD, FL 32771

ANTHONY CASABELLA *
1335 OAK SPRINGS PLACE
LAKE MARY, FL 32746

ERIC EATON *
621 COLGATE DRIVE
ALTAMONTE SPRINGS, FL 32714

JOMARIO FIELDS *
2434 CHASE AVENUE
SANFORD, FL 32771

MARTIN HALL
3462 WOODLEY PARK PLACE
OVIEDO, FL 32765

DAVID KEYS *
250 OAK PARK PLACE
CASSELBERRY, FL 32707

RAFFI MEKHDJAVAKIAN *
1667 THORNHILL CIRCLE
OVIEDO, FL 32765

CARMELO ORTIZ *
3477 WOODLEY PARK PLACE
OVIEDO, FL 32765

SAMUEL ORTIZ *
3477 WOODLEY PARK PLACE
OVIEDO, FL 32765

TAYLOR LEE ROSENBERG
4048 SUGAR PALM TERRACE
OVIEDO, FL 32762-5

LORRAINE SABATINO *
1619 BOMI CIRCLE
WINTER PARK, FL 32792

ZACHERY SEYMOUR *
3477 WOODLEY PARK PLACE
OVIEDO, FL 32765

JOHN SOMERS
LISA SOMERS
3475 WOODLEY PARK PLACE
OVIEDO, FL 32765

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 initialed "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
- 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
 - h. Search and seizure.
☒ Yes ☐ None
 - i. Documents related thereto.
☒ Yes ☐ None
 - j. Reports or statements of experts.
☐ Yes ☒ None (THE STATE WILL DISCLOSE TO THE DEFENSE DNA ANALYSIS REPORTS WHEN RECEIVED)
 - k. Tangible papers or objects not obtained from or belonging to defendant which the State intends to use at hearing or trial.
☒ Yes ☐ None
3. All tangible objects as provided by Fla. R. Crim. P. 3.220(b)(1)(vi) and RCrP 3.220(b)(1)(xi), unless "NONE" initialed below, may be inspected, photographed, copied and tested during regular and ordinary business hours at:
- a. STATE ATTORNEY'S OFFICE
 - b. SEMINOLE COUNTY SHERIFF'S OFFICE

This document will serve as authorization for above 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:

- a. # 592014CF003245AXXXXXX
- b. # 1400007812

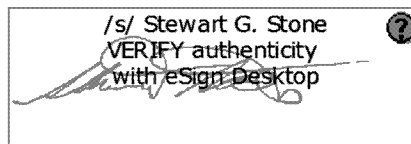
4. The State has herein submitted its witness list and expects the defense to submit its corresponding witness list within fifteen (15) days as provided in Fla. R. Crim. P. 3.220(d)(1). It is requested that defense disclosures of witness statements, reports of experts and tangible papers and objects 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. 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.

PLEASE NOTE THAT THE STATE HAS IN ITS POSSESSION 15 DVDs AND 1 CD. THESE DISCS HAVE BEEN COPIED FOR THE DEFENSE AND CAN BE DELIVERED BY UNITED STATES MAIL OR PICKED UP AT THE STATE ATTORNEY'S OFFICE.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by **E-MAIL** to THOMAS C. GREENE, ESQUIRE, Attorney for Defendant, at GREENETC@BELLSOUTH.NET this 23rd day of December, 2014.

PHIL ARCHER
STATE ATTORNEY



BY:

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