

**IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL
CIRCUIT
IN AND FOR VOLUSIA COUNTY, FLORIDA**

CASE NUMBER: 2025102222CFDL

**STATE OF FLORIDA
Plaintiff**

vs.

**MATTHEW MOULTON
Defendant**

STATE'S DISCOVERY EXHIBIT AND DEMAND FOR RECIPROCAL DISCOVERY

The State of Florida, pursuant to the Defendant's Notice of Discovery under Rule 3.220, Florida Rules of Criminal Procedure, discloses the following through its undersigned Assistant State Attorney, and pursuant to Florida Rules of Criminal Procedure, Rule 3.220(d) and demands reciprocal disclosures:

1.	3.220(b)(1)(A)	Names and addresses – See attached Witness List	<u> X </u>
2.	3.220(b)(1)(B)	Witness statements	<u> X </u>
3.	3.220(b)(1)(C)	Defendant Statements	<u> X </u>
4.	3.220(b)(1)(D)	Co-Defendant Statements	<u> </u>
5.	3.220(b)(1)(E)	Recorded grand jury testimony of defendant	<u> </u>
6.	3.220(b)(1)(F)	Papers or objects obtained from defendant	<u> X </u>
7.	3.220(b)(1)(G)	Material or information provided by confidential informant	<u> </u>
8.	3.220(b)(1)(H)	Electronic surveillance of conversations	<u> </u>
9.	3.220(b)(1)(I)	Search and seizure	<u> </u>
10.	3.220(b)(1)(J)	Reports or Statements of Experts	<u> </u>
11.	3.220(b)(1)(K)	Papers/objects not obtained from defendant	<u> X </u>

12. 3.220(b)(1)(L) Any tangible paper, objects or substances in the _____ possession of law enforcement that could be tested for DNA.

All tangible objects as provided by Rules of Criminal Procedure 3.220(b)(1)(F) and 3.220(b)(1)(K), unless "NONE" indicated below, may be inspected, photographed and tested during the regular and ordinary business hours after 48 hours written notice at: VCSO

The State demands Notice of Alibi in compliance with Rule 3.200 F.R.Cr.P. The offense charged occurred on 03/20/2025 between the hours of 0001 and 2359, in the vicinity of VOLUSIA County, Florida.

Further, the State demands reciprocal discovery of the following:

1. Within fifteen (15) days after receipt by the defense of the State's Discovery Exhibit, a written list of all witnesses and their addresses whom the defense expects to call as witnesses at the trial or hearing.

2. Within fifteen (15) days after receipt by the defense of compliance by the State with Florida Rules of Criminal Procedure, Rule 3.220(b), the State reciprocally demands:

(a) The recorded, signed or written statement of any person whom the Defendant expects to call as a witness.

(b) 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.

(c) Any tangible papers or objects which the defense counsel intends to use in the hearing or trial.

This document will serve as authorization for Attorney for Defendant, or his designated representative, after timely written notice to the State, to conduct the said discovery of tangible objects, in the above-styled cause.

I DO HEREBY CERTIFY that a copy hereof has been furnished to the office of Alexis Nava-Martinez at 101 North Alabama Avenue 3rd Floor ,Deland,FL 32724 by hand/mail/bin on July 7, 2025.

R.J. LARIZZA
STATE ATTORNEY

s/Jeanne Stratis
ASSISTANT STATE ATTORNEY
FLORIDA BAR #: 0479004
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WITNESS LIST

Category A witnesses present during defendant/co-defendant statements:

1.

Other Category A witnesses:

1. DANIEL SMITH, VCSO, 101 NORTH ALABAMA AVENUE #C023, DELAND, FL 32724
2. MICHAEL CHITWOOD, VCSO, 101 NORTH ALABAMA AVENUE #C023, DELAND, FL 32724
3. BRIAN FORTIN, , 619 S. College Avenue , College Place, WA 99324
4. BRANDON RHODES, , 619 S. College Avenue , College Place, WA 99324

Category B witnesses:

1.

Category C witnesses:

1.

Similar fact evidence/FS 90.404(2):

The State will amend and supplement with additional responses as necessary.