

IN THE CIRCUIT COURT OF THE THIRD
JUDICIAL CIRCUIT, IN AND FOR
MADISON COUNTY, FLORIDA.

STATE OF FLORIDA

-VS-

CRAIG A GRANT

Defendant(s),

CASE NO: 12-000039-CF-(A)

FILED FOR RECORD
12-000039
PM 12:31
Judy Townsend, CLERK
O.C.
CERTIFIED A TRUE COPY
TIM SANDERS
CLERK CIRCUIT COURT
MADISON COUNTY, FLORIDA
By *Judy Townsend*
Deputy Clerk

STATE'S DISCOVERY EXHIBIT

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. The names and addresses and categories of all persons known who the State to have information which may be relevant to the offense charged, or to any defense thereto, or to any similar fact evidence to be presented under F.S. 90.404(2), are as follows:

CATEGORY A:

TINA DEMOTSIS, [REDACTED]

Confidential Informant [REDACTED]

DR. LEWIS, MADISON VETERINARY CLINIC, [REDACTED]

[REDACTED] C/O INVESTIGATOR TINA DEMOTSIS

Confidential Informant [REDACTED]

Confidential Informant [REDACTED]

JAMIE WILLOUGHBY, ANIMAL CONTROL, [REDACTED]

CATEGORY B:

DR. JULIE LEVY, [REDACTED]

DR. DANA MILLER [REDACTED]
[REDACTED]

CATEGORY C:

NONE

Together with any other persons named in any reports, statements, or documents furnished herewith or in any deposition taken by defense. Sireci v. State, 399 So.2d 964 (Fla. 1981)

2. STATEMENTS, as defined in Rule 3.220(b)(1)(B), have been obtained from persons listed in paragraph one, and are furnished to the defense herewith:

3. The following statements were obtained from the accused:

See Attached

4. There were no statements obtained from a co-defendant who will be tried jointly with defendant:

5. There are no portions of recorded Grand Jury Minutes that contained testimony of the accused.

6. The following tangible papers or objects were obtained from or belonged to the accused:

SEE ATTACHED MADISON COUNTY SHERIFF'S OFFICE REPORTS
SEE ATTACHED ASPCA REPORTS

7. The State has material or information which was provided by a confidential informant.

8. There has not been electronic surveillance of the premises of the accused, or of conversations to which the accused was a party.

9. There has been a search or seizure. Documents relating thereto, if any are attached.

10. There are reports or statements of experts made in connection with this particular case. Copies of said reports, if any, are attached hereto.

11. The prosecuting attorney intends to use the following tangible papers or objects in the hearing or trial which were not obtained from or belonged to the defendant.

MADISON VETERINARY CLINIC REPORTS
PETA INVESTIGATIVE REPORT
PETA INVESTIGATIVE REPORT: INVESTIGATIVE FOOTAGE (VIDEO)
PETA INVESTIGATIVE REPORT: INVESTIGATIVE PHOTOGRAPHS
PHOTOGRAPHIC NECROPSY FOR "LILLY"
ASPCA EXAMINATION REPORTS OF 690 CATS AND 2 DOGS
ASPCA IAP REPORT
ASPCA SCENE SKETCHES
ASPCA RESPONSE PERSONNEL LOG
ASPCA ANIMAL INVENTORY & TRANSPORT MANIFEST
ASPCA EVIDENCE LOGS AND EVIDENCE RECEIPTS
ASPCA LAB TEST RESULTS
ASPCA DECEASED ANIMAL RECORDS & NECROPSY REPORTS
ASPCA SEIZED DOCUMENTATION OF INTEREST
ASPCA INVESTIGATIVE REPORTS
ASPCA SCENE VIDEOGRAPHY
ASPCA SCENE PHOTOGRAPHY
ASPCA ANIMAL ID FOLDER DOCUMENTS
ASPCA MASTER EVIDENCE LOG
ASPCA MICROCHIP MASTER LIST
ASPCA DECEASED LIST

12. Pursuant to Rule 3.220(b)(2) and Brady v. Maryland, 373 U.S. 83 (1963), the State hereby discloses the following material information in addition to the disclosures contained within paragraphs 1-11 above:

NONE

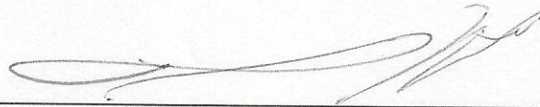
13. This document will serve as authorization for DAVID W. COLLINS, the attorney for the defendant to inspect copy, test and photograph the matters herein disclosed after reasonable notice to the person or agency in possession thereof of his/her intent and desire to do so.

RECIPROCAL DISCOVERY

The STATE OF FLORIDA hereby demands reciprocal discovery from the Defendant pursuant to Rule 3.220(d), Florida Rules of Criminal Procedure.

I HEREBY CERTIFY that a true and correct copy of this instrument was furnished by mail to DAVID W. COLLINS, ATTORNEY AT LAW, P.O. BOX 541, MONTICELLO, FL 32345 this 2nd day of May, 2012.

OFFICE OF THE STATE ATTORNEY
THIRD JUDICIAL CIRCUIT
100 SE COURT STREET
LIVE OAK, FL. 32064
PHONE: (386) 362-2320



WESLEY PAXSON, III
ASSISTANT STATE ATTORNEY
FLORIDA BAR NO. 66487