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CIRCUIT COURT, EIGHTEENTH  
JUDICIAL CIRCUIT, IN AND FOR  
SEMINOLE COUNTY, FLORIDA.

CASE NO.: 59-2012-CF-001792-A

STATE OF FLORIDA,

Plaintiff,

vs.

SHELLIE ZIMMERMAN,

Defendant.

FILED IN OFFICE  
MARYANNE MORSE  
CLERK CIRCUIT COURT  
2012 OCT -4 AM 10:51  
BY SEMINOLE CO. FLA.  
D.C.

**NOTICE OF INTENT TO PARTICIPATE IN DISCOVERY**

The Defendant, SHELLIE ZIMMERMAN, by and through the undersigned attorney respectfully demands that the Office of the State Attorney, within fifteen (15) days after service of this notice, disclose to defense counsel and permit defense counsel to inspect, copy, test and photograph or control the following information and material within the State's possession or control:

1. The names and addresses of any and all persons known to the prosecutor to have information which may be relevant to the offense charged and to any defense with respect thereto.
2. The statement of any and all persons whose name is furnished in compliance with the preceding paragraph. The term "statement", as used herein, includes a written statement made by said person and signed or otherwise adopted or approved by him. This shall include any and all statements of any kind or manner made by such person and written or recorded or summarized in any writing or recording. The term "statement" is specifically intended to include all police and investigative reports of any

kind prepared for or in connection with the case.

3. Any written or recorded statements and the substance of any oral statements made by the accused, including a copy of any statements contained in the police reports or report summaries, together with the name and address of each witness to the statements. This should include, but not be limited to, statements taken from the accused.

4. Any written or recorded statements and the substance of any oral statements made by a co-defendant(s), whether or not said co-defendant(s) is charged under the same case number.

5. Those portions of the recorded Grand Jury Minutes that contain testimony of the accused.

6. Any tangible papers or objects which were obtained from or belonged to the accused.

7. Whether the State has any material or information which has been provided by a confidential informant.

8. Whether there has been any electronic surveillance including wiretapping, of the premises of the accused or of conversations to which the accused was a party; and any documents relating thereto.

9. Whether there has been any search or seizure of any kind in the instant case, and any documents relating thereto.

10. Reports or statements of experts made in connection with this particular case, including results of physical or mental examinations and of scientific tests, experiments or comparisons.

11. Any tangible papers or objects which the prosecuting attorney intends to use in hearing or trial which were not obtained from or belong to the accused.

12. Any material information within the State's possession or control which tends to negate the guilt of the accused as to the offense charged.

13. Defendant's probation file, including probation officer's reports, documents and any statements made by Defendant to probation employees, if applicable in any manner to the offense charged.

14. Any and all photographs taken of the Defendant or of any portion of his body.

15. Any and all photographs taken of the crime scene and/or of the victim(s) of the crime or otherwise relating to this case.

16. Any photographs which have been exhibited for the purpose of establishing the identity of the perpetrator of the crime.

17. Names and addresses of all persons who failed to identify the accused upon being presented with a photograph or video during the investigation or preparation of the case.

18. Any and all consideration or promises of consideration given to or made on behalf of State witnesses.

19. Any and all prosecutions, investigations, or possible prosecutions pending which could be brought against any witnesses and any probationary, parole or deferred prosecution statuses of the witnesses.

20. Any and all records and information revealing felony convictions or crimes of dishonesty relating to any state's witness.

21. Any and all records and information showing prior misconduct or bad acts committed by any State's witness.

22. Any information tending to show that other persons, excluding the accused, were involved in the crime.

23. Any information that tends to show that the accused had consumed alcohol and/or drugs prior to the commission of the offense.

24. Any information that any of the State's witnesses, including the alleged victim(s), had consumed alcohol and/or drugs prior to witnessing or experiencing the events that give rise to their respective testimony.

25. Any statements of witnesses which conflict either internally or with another statement of the same witness.

26. The results and reports, including questions asked, of any polygraph testing of Defendant or any State Witness.

27. Any psychiatric, psychological, or mental evaluations taken by a State's witness or any evidence of psychiatric, psychological or mental treatment of any state's witness.

28. Any hypnosis or memory refreshment given to any state's witness to assist that witness's memory for investigative or trial preparation purposes.

29. Any internal documents or other evidence of any law enforcement official's misfeasance, malfeasance or negligence whether by acts of omission or commission, in the performance of his/her duties, concerning this specific case.

30. Any evidence of the periodic destruction of any evidence, including but not limited to law enforcement document retention policies.

31. The names and addresses of any individuals who were considered at any time during the case as possible suspects and the evidence that led to this conclusion.

32. "Mugshots", photographs or other physical evidence used but eliminated during the course of the investigation and the reasons for their discontinuance.

33. The names and addresses of other individuals who may have confessed to this crime or crimes with a similar modus operandi.

34. Any statement of a witness or other individual which presents or indicates a doubt as to the identity of the accused, the location of the crime, or the description of any tangible item relevant to the charge.

35. Any evidence which indicates or tends to show that the alleged victim was or is a dangerous or turbulent character or was not a peaceful, law-abiding person.

36. Any evidence indicating that the alleged victim and the accused engaged in any argument, disagreement or fight prior to the time of the incident.

37. Any evidence that the accused acted in self-defense or was provoked by the alleged victim prior to the incident other than what has been previously provided.

38. Any evidence that indicates the alleged victim was or is an alcoholic or drug-dependent person.

39. Any evidence concerning the mental stability or personality characteristics of the alleged victim that may have lead to the incident between the accused and the decedent.

40. Any evidence of behavior of Defendant while incarcerated.

41. Any evidence of alcohol or drug abuse by Defendant.

42. Any medical history of Defendant.

43. Any employment history of Defendant.

44. All psychological and psychiatric records of the Defendant including tests, observations, diagnosis, and treatment.

45. The criminal history of the Defendant including all arrests, dispositions, incarcerations, paroles, probations, and placements.

The above is requested pursuant to Fla. R. Crim. P. 3.200(a)(1)(i) through (xi) and (2), inclusive.

I HEREBY CERTIFY that a copy of the foregoing has been furnished by facsimile delivery to John I. Guy, Esquire, Office of the State Attorney, Fourth Judicial Circuit, Duval County Courthouse Annex, 220 East Bay Street, Jacksonville, Florida 32202 this the 4th day of October, 2012.

  
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