

IN THE CIRCUIT COURT, SEVENTH  
JUDICIAL CIRCUIT, IN AND FOR  
FLAGLER COUNTY, FLORIDA

STATE OF FLORIDA,

CASE NUMBER: 2018-00927-CFFA

v.

JUDGE TERENCE R. PERKINS

VICTOR WILLIAMS,  
Defendant.

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**DEMAND FOR DISCLOSURE OF IMPEACHING INFORMATION**

COMES NOW the Accused, VICTOR WILLIAMS, by and through undersigned counsel, and demands the State of Florida to reveal the following:

1. All material information in the State's possession or control (constructive or actual) that tends to negate Defendant's guilt;

2. All material evidence or information in the State's possession or control (constructive or actual) that is probably material and exculpatory regardless of whether such information is deemed to be the work product of the prosecutor or otherwise subject to discovery as a public record;

3. Any oral, written or recorded statements made by an person(s) to the police, to the Assistant State Attorney, to a victim advocate or other employee of the Office of the State Attorney, or to the Grand Jury that tends to establish the innocence of Defendant, or that tends to impeach the credibility or contradict the testimony of any witness whom the State will call during this case;

4. Any reports made to the police that tend to establish the innocence of the Defendant, or tend to impeach the credibility or contradict the testimony of any witness whom the State will call as a witness during this case;

5. The names and addresses of witnesses who might establish the innocence of the Defendant, or impeach the credibility or contradict the testimony of any witness whom the State calls as a witness during this case;

6. Any information or material that tends to establish the innocence of the Defendant, or impeach the credibility or contradict the testimony of any witness whom the State calls as a witness in this case;

7. Any scientific or medical report that tends to establish the innocence of the Defendant, or to impeach the credibility or contradict the testimony of any witness whom the State calls as a witness during this case;

8. The substance of any and all statements, agreements, offers or discussions had with any of the State's witnesses or a suggestion of lenience, compensation, assurance not to prosecute, assurance to proceed only on certain causes, or any other offer to benefit accruing to said individual whatsoever in exchange for their cooperation, assistance of testimony in the trial herein;

9. Any and all consideration or promises of consideration given to or made on behalf of government witnesses. By "consideration," Defendant refers to absolutely anything of value or use including but not limited to immunity grants, witness fees, special witness fees, transportation assistance, assistance or favorable treatment with respect to any criminal, civil, tax court, or administrative dispute, and anything else which could arguably create an interest or bias in the witness in favor of the State or against the defense or act as an inducement to testify or to color testimony.

10. Any and all prosecutions, investigations or possible prosecutions pending or which could be brought against the witness and any probationary, parole or deferred prosecution status of the witness;

11. Any and all records and information revealing felony convictions attributed to this witness;

12. Any and all records and information showing prior misconduct or bad acts committed by the witness;

As grounds in support of said Motion the Defendant would allege as follows:

The evidence of any such offers or representations which have been made by the State or which the State will make at any future time of any witness for the State should be discoverable pursuant to the Due Process Clause of the United States Constitution, Amendments V and XIV and the Florida Constitution, Article 1, and the withholding of any such evidence constitutes a denial of the Accused herein constitutionally protected rights to due process and fundamental fairness as well as his right to effectively cross-examine and impeach the witness against him as guaranteed by the United States Constitution, Amendment VI and the Florida Constitution, Article 1, Sections 9 and 16.

WHEREFORE, the Defendant moves this Honorable Court to grant this motion.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by eservice/delivery to the Office of the State Attorney, 1769 East Moody Blvd., Bldg. #1, Bunnell, FL 32110, eserviceflagler@sao7.org, on July 23, 2019.

*/s/ Regina Nunnally*

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REGINA NUNNALLY  
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