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

STATE OF FLORIDA

V.

CASE NO.: 2014-576CF

ROBERT ZETROUER

Defendant/

NOTICE OF SIMILAR FACT EVIDENCE OR EVIDENCE OF OTHER CRIMES, WRONGS, OR ACTS

COMES NOW, R.J. LARIZZA, State Attorney for the Seventh Judicial Circuit of Florida, by and through the undersigned Assistant State Attorney, pursuant to F.S. 90.404(2)(a), F.S. 90.404(2)(b) 1 and 90.404(2)(c) and the law as set out in Williams vs. State, 110 So.2d 654 (Fla.1959) and files with this Honorable Court, notice of the State's intent to use evidence of child molestation in the trial of the above-styled cause and hereby gives notice to the Court and all parties that the State intends to offer at trial evidence as follows:

- 1. The Defendant did unlawfully and intentionally touch T.O., a person less than 12 years of age in a lewd or lascivious manner the genitals, genital area, or buttocks; or the clothing covering them or did expose his penis to T.O. in a lewd or lascivious manner.
- 2. The State has provided discovery of these other allegations in the form of police reports, interviews, Child Protection Team reports, etc.

This evidence is offered and is relevant to prove motive, opportunity, intent, preparation, plan, knowledge, identity, absence of mistake or accident, and/or to corroborate the testimony of the victim(s). It is not sought to be introduced to prove bad character or propensity on behalf of the defendant.

Respectfully submitted:

CHRISTINA OF SAHL

ASSISTANT STATE ATTORNEY

FLORIDA BAR NO.:0017428

CERTIFICATE OF SERVICE

| I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished | by |
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| mail or email to GARRY WOOD, this 20 Lay of November, 2015. | |