

Filing # 121837213 E-Filed 02/22/2021 03:30:43 PM

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

**CASE NUMBER: 21-00024-CFFA FELONY**

**STATE OF FLORIDA**

**Plaintiff,**

**vs.**

**DERRIUS BRAXTON BAUER  
Defendant.**

**STATE'S DISCOVERY EXHIBIT**

The State of Florida, pursuant to the Defendant's Notice of Discovery under Rule 3.220, Florida Rules of Criminal Procedure, discloses the following:

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>    X    </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>    X    </u>
8.	3.220(b)(1)(H)	Electronic surveillance of conversations	<u>          </u>
9.	3.220(b)(1)(I)	Search and seizure	<u>    X    </u>
10.	3.220(b)(1)(J)	Reports or Statements of Experts	<u>    X    </u>
11.	3.220(b)(1)(K)	Papers or objects not obtained from defendant	<u>    X    </u>

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 the Office of the State Attorney, Homicide Investigations Unit, 2446 Dobbs Rd., St. Augustine, FL 32086.

The State demands Notice of Alibi in compliance with Rule 3.200 F.R.Cr.P. The offense charged occurred on 10/12/2019 between the hours of 0001 and 2359, in the vicinity of FLAGLER County, Florida.

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 HEREBY CERTIFY that a true copy hereof has been furnished to the Office of Ann E. Finnell, 2114 Oak St., Jacksonville, FL 32204, by U.S. Mail, electronic mail, or e-service delivery on February 22, 2021.

R.J. LARIZZA  
STATE ATTORNEY

s/K. MARK JOHNSON  
\_\_\_\_\_  
ASSISTANT STATE ATTORNEY  
FLORIDA BAR #: 0378320  
2446 DOBBS ROAD  
ST AUGUSTINE, FL 32086  
ESERVICEFLAGLER@SAO7.ORG  
(904) 209-1300

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**STATE OF FLORIDA**

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**vs.**

**DERRIUS BRAXTON BAUER  
Defendant.**

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**WITNESS & EXHIBITS LIST**

**(A) Potential Witnesses:**

*Category A witnesses present during statements by the defendant or co-defendant:*

Flagler Co. Sheriff's Office

1. Det. Agustin Rodriguez, Jr., FCSO, P.O. Box 879, Bunnell, FL 32110
1. Det. George Hristakopoulos, FCSO, P.O. Box 879, Bunnell, FL 32110
2. Det. Darrell Butler, FCSO, P.O. Box 879, Bunnell, FL 32110
3. Det. Marcus Dawson, FCSO, P.O. Box 879, Bunnell, FL 32110

Clay Co. Sheriff's Office

4. Det. C.P. Redmond, CCSO, 212 Blanding Blvd., Orange Park, FL 32073

Lay Witnesses

5. Karen Jackson, 389 Forest Meadow Ln., Orange Park, FL 32065

*Other Category A witnesses:*

Flagler Co. Sheriff's Office

6. Dep. Adam Barkoskie, FCSO, P.O. Box 879, Bunnell, FL 32110
7. Dep. Joseph Barile, FCSO, P.O. Box 879, Bunnell, FL 32110
8. Dep. Anthony Bifano, FCSO, P.O. Box 879, Bunnell, FL 32110
9. Chief Paul, Bovino, FCSO, P.O. Box 879, Bunnell, FL 32110
10. Det. Andrew Cangialosi, FCSO, P.O. Box 879, Bunnell, FL 32110
11. Dep. Troy Cavas, FCSO, P.O. Box 879, Bunnell, FL 32110
12. Dep. Austin Chewning, FCSO, P.O. Box 879, Bunnell, FL 32110
13. Det. Elizabeth Conrad, FCSO, P.O. Box 879, Bunnell, FL 32110
14. Dep. Philip Conway, FCSO, P.O. Box 879, Bunnell, FL 32110
15. Dep. Joseph Costello, FCSO, P.O. Box 879, Bunnell, FL 32110
16. Dep. Alicia Cowan, FCSO, P.O. Box 879, Bunnell, FL 32110
17. Dep. Christopher Crego, FCSO, P.O. Box 879, Bunnell, FL 32110

18. Sgt. D. Edmonds, FCSO, P.O. Box 879, Bunnell, FL 32110
19. Det. Arthur Erlandson, FCSO, P.O. Box 879, Bunnell, FL 32110
20. Dep. Brandon Fiveash, FCSO, P.O. Box 879, Bunnell, FL 32110
21. Det. Jorge Fuentes, FCSO, P.O. Box 879, Bunnell, FL 32110
22. Cpl. Franklin Gamarra, FCSO, P.O. Box 879, Bunnell, FL 32110
23. Dep. Adam Gossett, FCSO, P.O. Box 879, Bunnell, FL 32110
24. Dep. Paul Kandour, FCSO, P.O. Box 879, Bunnell, FL 32110
25. Det. D. LaVerne, FCSO, P.O. Box 879, Bunnell, FL 32110
26. Det. Dennis Lashbrook, FCSO, P.O. Box 879, Bunnell, FL 32110
27. Dep. Robert Lewis, FCSO, P.O. Box 879, Bunnell, FL 32110
28. CSI Laura McKinlay, FCSO, P.O. Box 879, Bunnell, FL 32110
29. Cpl. Ronald Mello, FCSO, P.O. Box 879, Bunnell, FL 32110
30. Dep. James Miley, FCSO, P.O. Box 879, Bunnell, FL 32110
31. Sgt. Michael Miller, FCSO, P.O. Box 879, Bunnell, FL 32110
32. Det. Diego Morales, FCSO, P.O. Box 879, Bunnell, FL 32110
33. Det. Mark Moy, FCSO, P.O. Box 879, Bunnell, FL 32110
34. Dep. Robert Myers, FCSO, P.O. Box 879, Bunnell, FL 32110
35. Dep. Christopher Nguyen, FCSO, P.O. Box 879, Bunnell, FL 32110
36. Det. Joseph O'Barr, FCSO, P.O. Box 879, Bunnell, FL 32110
37. Dep. Taylor Oldham, FCSO, P.O. Box 879, Bunnell, FL 32110
38. Det. Richard Petkovsel, FCSO, P.O. Box 879, Bunnell, FL 32110
39. Dep. Crista Rainey, FCSO, P.O. Box 879, Bunnell, FL 32110
40. Dep. Enrique Ramirez, FCSO, P.O. Box 879, Bunnell, FL 32110
41. Dep. Jon Daniel Reckenwald, FCSO, P.O. Box 879, Bunnell, FL 32110
42. Cmdr. Christopher Sepe, FCSO, P.O. Box 879, Bunnell, FL 32110
43. Dep. J. Gibson Smith, FCSO, P.O. Box 879, Bunnell, FL 32110
44. Cmdr. Jennifer Taylor, FCSO, P.O. Box 879, Bunnell, FL 32110
45. Dep. Gregory Tietje, FCSO, P.O. Box 879, Bunnell, FL 32110
46. Dep. Dedorius Varnes, FCSO, P.O. Box 879, Bunnell, FL 32110
47. Dep. Richard Wallis, FCSO, P.O. Box 879, Bunnell, FL 32110
48. Cmdr. Jonathan Welker, FCSO, P.O. Box 879, Bunnell, FL 32110
49. Dep. J.S. Welter, FCSO, P.O. Box 879, Bunnell, FL 32110
50. Det. Jacob West, FCSO, P.O. Box 879, Bunnell, FL 32110
51. Sgt. Bernard Woodward, FCSO, P.O. Box 879, Bunnell, FL 32110
52. CSI Cece Woody, FCSO, P.O. Box 879, Bunnell, FL 32110
53. Dep. Dedorius Varnes, FCSO, P.O. Box 879, Bunnell, FL 32110

#### Florida Highway Patrol

54. Tpr. Darin Harper, FHP, 875 State Rd. 16, St. Augustine, FL 32084

#### Jacksonville Sheriff's Office

55. Ofc. Griffin, JSO, 501 E. Bay St., Jacksonville, FL 32202

#### Clay Co. Sheriff's Office

56. Dep. Edmondson, CCSO, 901 N. Orange Ave., Green Cove Springs, FL 32043
57. Det. Patrick Vitellaro, CCSO, 901 N. Orange Ave., Green Cove Springs, FL 32043
58. CSI T.N. Thibideau, CCSO, 901 N. Orange Ave., Green Cove Springs, FL 32043
59. Dep. S.D Adams, CCSO, 901 N. Orange Ave., Green Cove Springs, FL 32043



St. Johns Co. Sheriff's Office

- 60. Det. Matthew Thomas, SJSO, 4015 Lewis Speedway, St. Augustine, FL 32084
- 61. CSI Shawn Vollmar, SJSO, SJSO, 4015 Lewis Speedway, St. Augustine, FL 32084

Walterboro (SC) Police Department

- 62. Ofc. Brandon Allen Duboise, Walterboro Police Dept., 242 Hampton St, Walterboro, SC 29488
- 63. Ofc. Jamie M. Bloodworth, Walterboro Police Dept., 242 Hampton St, Walterboro, SC 29488
- 64. Ofc. Ross Hantz, Walterboro Police Dept., 242 Hampton St, Walterboro, SC 29488
- 65. Ofc. Demetrius Gilyard, Walterboro Police Dept., 242 Hampton St, Walterboro, SC 29488

Federal Bureau of Investigations

- 66. Christopher W. Iber, FBI
- 67. Jenna M. Walker, FBI

Bureau of Alcohol, Tobacco & Firearms

- 68. S.A. John Leahy, ATF
- 69. S.A. Elizabeth Gillis, ATF,

Florida Department of Law Enforcement

- 70. Kayla Kahre, FDLE, 921 N. Davis St., Bldg. E, Jacksonville, FL 32209
- 71. Christopher Rishel, FDLE, 921 N. Davis St., Bldg. E, Jacksonville, FL 32209
- 72. Jeannelyn Adona, FDLE, 921 N. Davis St., Bldg. E, Jacksonville, FL 32209

RJ Lee Group

- 73. Allison M. Laneve, RJ Lee Group, 350 Hochberg Rd., Monroeville, PA 15146
- 74. Tarah Helsel, RJ Lee Group, 350 Hochberg Rd., Monroeville, PA 15146

Medical Examiner's Office

- 75. Dr. Predrag Bulic, MEO-23, 4501 Avenue A, St. Augustine, FL 32095

Lay Witnesses

- 76. D'Shawn Damien Hosang, 49 Berkshire Ln., Palm Coast, FL 32137
- 77. Robert Matthew Murphy, 25 Westmount Ln., Palm Coast, FL 32164
- 78. Suzanne Alexandria Davis, 11020 SW 141st Ave., Miami, FL 33186
- 79. Austin Chase King, 88 Belvedere Ln., Palm Coast, FL 32137
- 80. Jonathan Seaton McAndrew, 3 Baltimore Ln., Palm Coast, FL 32137
- 81. Lance Loring York, 21 Buffalo Grove Pl., Palm Coast, FL 32137
- 82. Edward Lester Hupp, III, 90 Flamingo Dr., Palm Coast, FL 32137
- 83. Jordan Tyler Cheney, 90 Flamingo Dr., Palm Coast, FL 32137
- 84. Tatyana Semone Beaulieu, 9A Regent Ln., Palm Coast, FL 32164
- 85. Dalton Matthew Kinney, 40 Park Place Ave., Bunnell, FL 32110
- 86. Wyatt Matthew Kinney, 40 Park Place Ave., Bunnell, FL 32110

87. Cedric Marquell White, 322 North 7th St., Palatka, FL 32177
88. Ray Kevin Charles, 558 Logan Pl., Newport News, VA 23601
89. Jarod P. Humphrey, c/o State Attorney's Office, 2446 Dobbs Rd., St. Augustine, FL 32086
90. Jarvus Kryon Smith, 412 Chestnut Dr., Jacksonville, FL 32208
91. Kalista Michelle Howell, 27 Edmond Pl., Palm Coast, FL 32164
92. Gail Ann Goodhue, 59 Bruning Ln., Palm Coast, FL 32137
93. Michael William Goodhue, 59 Bruning Ln., Palm Coast, FL 32137
94. Sharon Gail Goodhue, 59 Bruning Ln., Palm Coast, FL 32137
95. Steven Harry Goodhue, 59 Bruning Ln., Palm Coast, FL 32137
96. Donna Michelle Pavlichek, 59 Bruning Ln., Palm Coast, FL 32137
97. Jeremiah Noel Torres, 21 Fitzgerald Ln., Palm Coast, FL 32137
98. Farrah Bonilla, 21 Fitzgerald Ln., Palm Coast, FL 32137
99. Joshua Jose Ortiz, 21 Ballard Ln., Palm Coast, FL 32164
100. Danny James Suter, 16 Oakmont Ct., Palm Coast, FL 32137
101. Tyrik Reginald Christie, 28 London Dr., Palm Coast, FL 32137
102. Michael Joseph Connelly, 16 Bassett Ln., Palm Coast, FL 32137
103. David Francis Connelly, 1 Beech Pl., Palm Coast, FL 32137
104. Brian Theodore Koester, 162 Beechwood Ln., Palm Coast, FL 32137
105. Dylan David Santiago, 1148 Castle Wood Terrace, Apt. 206, Casselberry, FL 32707
106. Michael Anthony Howard, Jr., 1153 26th St, Newport News, VA 23607
107. Austin Flores
108. Joellyn A. McCaskill, Circle K, 1500 Palm Coast Pkwy., Palm Coast, FL 32137
109. John Paul Alvarez, 4 Zeppo Ct., Palm Coast, FL 32164
110. Naomi Lynn Bartram, 73 Berkshire Ln., Palm Coast, FL 32137
111. Jennifer Marie Graham, 322 Edgehill Rd., Satsuma, FL 32189
112. Steve MacClosskey, 35 Lafayette Ln., Palm Coast, FL 32164
113. Alfonso A. McCoy, Circle K, 1500 Palm Coast Pkwy., Palm Coast, FL 32137
114. Karrah Ann Mongone, 121 Bridgehaven Dr., Palm Coast, FL 32137
115. Christina Ann Sapienza, 37 Braddock Ln., Palm Coast, FL 32137
116. Quiaudry Netrionna Williams, 1717 Mason Ave., Apt. 533, Daytona Beach, FL 32114
117. Michael J. Chandley, 1250 Belle Terre Pkwy., Palm Coast, FL 32164
118. David Earl Larson, Winn Dixie, Palm Coast, FL 32164
119. Christine Touhey, 39 Belleaire Dr., Palm Coast, FL 32137
120. Zachary Weaver, 121 Pine Lakes Pkwy. N., Apt. 710, Palm Coast, FL 32137
121. Malik Chambliss, 40 Rivera Ln, Palm Coast, FL 32164

***Category B witnesses:***

122. Inv. Dan Nichols, MEO-23, 4501 Avenue A, St. Augustine, FL 32095

***Category C witnesses:***

**(B) Witness Statements/Affidavits/Reports:**

Flagler Co. Sheriff's Office

Dep. Adam Barkoskie	Supplement Report	1 page
Dep. Joseph Barile	Case Narrative Supplement	2 pages
Dep. Anthony Bifano	Case Narrative Supplement	2 pages

Det. Darrell Butler	Investigative Report	39 pages
	Death Investigation Report	1 page
	Affidavit of Attendance (autopsy)	1 page
	Emails to/from Jerry J. Noh	4 pages
	Email to/from Lulu Williams	3 pages
Dep. Troy Cavas	K-9 Deployment Detail Report	3 pages
Dep. Austin Chewning	Case Narrative Supplement	2 pages
Dep. Philip Conway	Case Narrative Supplement	2 pages
Dep. Alicia Cowan	Case Narrative Supplement	2 pages
Dep. Joseph Costello	Supplement	2 pages
Dep. Christopher Crego	Case Narrative Supplement	2 pages
Cpl. Franklin Gamarra	Supplement Report (re: photo array)	1 page
Det. George Hristakopoulos	Investigative Report	8 pages
Det. Dennis Lashbrook	Investigations Report	1 page
	Digital Forensic Intake Form (1/2/20)	2 pages
Det. D. LaVerne	Investigative Supplement Report	1 page
Dep. Robert Lewis	Case Narrative Supplement	2 pages
	Vehicle Disposition Report	1 page
CSI Laura McKinlay	Crime Scene Investigative Report	8 pages
Dep. James Miley	Case Narrative Supplement	2 pages
Det. Diego Morales	Investigative Summary	1 page
Det. Mark Moy	Digital Forensic Intake Form (1/22/20)	2 pages
Dep. Robert Myers	Case Narrative Supplement	2 pages
Dep. Christopher Nguyen	Case Report	5 pages
	Crime Scene Log	2 pages
Dep. Taylor Oldham	Case Narrative Supplement	2 pages
Dep. Crista Rainey	Case Narrative Supplement	2 pages
Det. Agustin Rodriguez	Investigative Supplement (re: 911 call)	1 page
	Investigative Supplement (re: J.L. interview)	1 page
	Investigative Supplement (re: D.C. interview)	1 page
	Investigative Supplement (re: Steven Goodhue interview)	1 page
	Investigative Supplement (re: Steven Goodhue interview)	1 page

	Investigative Supplement (re: Steven Goodhue interview)	1 page
	Investigative Supplement (re: Karen Jackson phone call)	1 page
	Investigative Supplement (re: D. Hosang interview)	1 page
	Investigative Supplement (re: D. Hosang interview)	1 page
	Investigative Supplement (re: T. Beaulieu interview)	1 page
	Investigative Supplement (re: Robert Murphy interview)	1 page
	Investigative Supplement (re: Suzanne Davis phone call)	1 page
	Investigative Supplement (re: Ray Charles interview)	1 page
	Investigative Supplement (re: Kalista Howell interview)	1 page
	Investigative Supplement (re: Jennifer Graham interview)	1 page
	Investigative Supplement (re: John Alvarez interview)	1 page
	Investigative Supplement (re: Naomi Bartram)	1 page
	Investigative Supplement (re: mapping)	1 page
	Investigative Supplement (re: LPR data)	1 page
	Untitled report (re: "Scorpio" identification)	8 pages
	Cellular Mapping Intake Forms (2) (8/20/20)	4 pages
	Memorandum to FBI (11/24/20)	2 pages
	Letter to FBI (7/28/20)	2 pages
Dep. J. Gibson Smith	Case Supplement Report	3 pages
Dep. Gregory Tietje	Case Narrative Supplement	2 pages
Dep. Dedorius Varnes	Case Narrative Supplement	2 pages
Dep. Richard Wallis	Case Narrative Supplement	2 pages
	Crime Scene Log	4 pages
Dep. Bernard Woodward	Supplement Narrative	1 page
	Currency Verification Form	1 page
CSI Cece Woody	Crime Scene Investigative Report	9 pages
	Forensic Unit Analysis Report	2 pages
	Affidavit of Attendance (autopsy)	1 page
<u>Clay Co. Sheriff's Office</u>		
Det. C.P. Redmond	Arrest Report	8 pages
Det. Patrick Vitellaro	Incident/Investigation Report	2 pages
	Reporting Officer Narrative	1 page
CSI T.N. Thibideau	Case Supplemental Report	2 pages
	Evidence/Submission Collection Report	4 pages
Dep. S.D. Adams	Warrant Arrest	2 pages
<u>Walterboro Police Dept.</u>		
Ofc. Brandon Allen Duboise	Narrative	16 pages

Bureau of Alcohol, Tobacco & Firearms

S.A. John Leahy / Elizabeth Gillis	PowerPoint slide re: Mini Draco 7.62x39mm	1 page
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Federal Bureau of Investigations

Christopher W. Iber	Report of Examination	3 pages
	Charts (9 total)	9 pages

Medical Examiner's Office

Inv. Dan Nichols	Investigators Report	2 pages
	Scene Investigation Narrative	1 page

Lay Witnesses

S.T.	Audio recorded interview (10/12/19)
	Audio recorded interview (7/20/20)
	Audio recorded interview (10/15/20)

Alfonso McCoy	Voluntary Witness Statement	1 page
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Tatyana Beaulieu	Audio recorded interview (11/8/19)	3 pages
	Functional Equivalent Simultaneous	
	Photo Array Form	

David Connelly	Audio recorded interview (3/24/20)
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Jarvus Smith	Audio recorded interview (12/30/19)
	Audio recorded interview (12/31/19)
	Audio recorded interview (1/2/20)
	Audio recorded interview (1/15/20)
	Audio recorded phone call (7/17/20)
	Audio recorded phone call (7/17/20)

D'Shawn Hosang	Audio recorded interview (10/12/19)
	Audio recorded interview (10/25/19)
	Video recorded interview (1/14/20)
	Audio recorded interview (11/15/19)
	Audio recorded contact (1/14/20)

Kalista Howell	Audio recorded phone call (1/14/20)
	Audio recorded interview (1/14/20)

Karen Jackson	Audio recorded phone call (10/23/19)
	Audio recorded phone call (10/24/19)
	Audio recorded phone call (12/2/19)
	Audio recorded phone call (12/2/19)
	Audio recorded phone call (1/8/20)
	Audio recorded phone call (3/17/20)
	Audio recorded phone call (6/4/20)

	Audio recorded voicemail (9/15/20)
Dalton Kinney	Audio recorded interview (11/12/19)
Donna Pavlichek	Audio recorded interview (10/15/19)
Donna Pavlichek & Steven Goodhue	Audio recorded interview (11/4/19)
Donna Pavlichek & Gail Goodhue	Audio recorded interview (11/12/19)
Farrah Bonilla	Audio recorded interview (10/16/19)
Jeremiah Torres	Audio recorded interview (10/13/19) Audio recorded interview (4/28/20)
Farrah Bonilla, Jeremiah Torres &	Audio recorded interviews (10/13/19)
Joshua Ortiz	Audio recorded interview (10/22/19)
Lance York	Audio recorded interview (10/17/19) Audio recorded phone call (10/17/19)
Michael Connelly	Audio recorded interview (10/17/19)
Michael Connelly, Brian Koester & Christine Touhey	Audio recorded interviews (10/17/19)
Michael Goodhue	Audio recorded interview (10/15/19)
Robert Murphy	Audio recorded interview (11/12/19) Audio recorded interview (11/12/19) Audio recorded phone call (5/11/20) Audio recorded conversation (5/11/20)
Suzanne Davis & Robert Murphy	Audio recorded interview – part 1 (5/12/20) Audio recorded interview – part 2 (5/12/20)
Suzanne Davis	Audio recorded interview (11/15/19)
Sharon Raines	Audio recorded interview (10/15/19)
Wyatt Kinney	Audio recorded interview (11/13/19)
D.C. & Tyrik Christie	Audio recorded interviews (10/13/19)
Jordan Cheney & Edward Hupp	Audio recorded interviews (10/17/19)
Ray Charles	Audio recorded interview (12/12/19) Audio recorded interview (11/28/20) Audio recorded interview (11/29/20) Audio recorded phone calls from Newport News Jail (2)

J.L.	Audio recorded interview (10/13/19) Audio recorded interview (10/21/19)
Andrew Degeronimo	Audio recorded interview (10/14/19)
Gail Goodhue	Audio recorded interview (10/15/19)
Steven Goodhue	Audio recorded interview (10/12/19) Audio recorded interview (10/14/19) Audio recorded interview (10/15/19) Audio recorded interview (10/15/19) Audio recording of entire interaction (10/15/19) Video recorded reenactment Audio recorded interview (11/15/19) Audio recorded interview (4/28/20)
Hiawasse Watson	Audio recorded interview (10/18/19)
Ken & Vita Davis	Audio recorded interview (10/12/19) Audio recorded phone call (10/12/19)
Ken Davis, Jr.	Audio recorded interview (4/21/20)
Austin King	Audio recorded interview (10/13/19)
Christina Sapienza	Audio recorded interview (10/13/19)
Jonathan McAndrew	Audio recorded interview (10/13/19) Video recorded reenactment (10/13/19)
Andrew Degeronimo	Audio recorded interview (10/14/19)
Zachary Weaver	Audio recorded interview (10/17/19)
Michael Davis	Audio recorded interview (10/17/19)
Quiaudry Williams	Audio recorded interview (12/4/19) Audio recorded interview (12/4/19)
Julie Johnson	Audio recorded interview (12/12/19)
Jennifer Graham	Audio recorded interview (5/5/20)
John Alvarez	Audio recorded interview (5/5/20) Audio recorded interview (5/5/20)
Paula Koser	Audio recorded interview (5/7/20)
Naomi Bartram	Audio recorded interview (5/7/20)
Jasmine Sanchez	Audio recorded interview (7/17/20)

Karrah Mongone	Audio recorded interview (7/17/20)
Malik Chambliss	Audio recorded interview (7/23/20)
Dighamyosuf Khwaja	Audio recorded interview (7/28/20)
Shawn Baisden	Audio recorded interview (8/10/20)
Mike Howard	Audio recorded conversation #1 (11/29/20) Audio recorded conversation #2 (11/29/20) Audio recorded conversation #3 (11/29/20) Audio recorded conversation #4 (11/29/20)
Jarod Humphrey	Audio recorded conversation (11/29/20) Video recorded interview (11/29/20)
La'Hazel Williams	Audio recorded conversation (12/2/20) Audio recorded conversation (12/2/20)

**(C) Statements by Defendant:**

Video recorded interview of Derrius Bauer at CCSO

Audio recording of interview of Derrius Bauer at Clay Co. Sheriff's Office (11/16/19)

Audio recorded interview of Derrius Bauer (8/24/20)

Audio recorded phone calls from Derrius Bauer from the Clay Co. Jail (7)

Audio recording of phone call to Derrius Bauer & Karen Jackson (11/21/19)

Audio recording of contact with Derrius Bauer & Karen Jackson (8/10/20)

Video recorded interview of Derrius Bauer at Jacksonville Sheriff's Office (1/7/21)

**(D) Statements by Co-Defendant:**

Video recorded interview of Marcus Chamblin at CCSO

Audio recorded phone calls from Marcus Chamblin from the Clay Co. Jail (3)

Audio recording of execution of search warrant with Marcus Chamblin at St. Johns Co. Jail (11/21/19)

Audio recorded phone calls from Marcus Chamblin from the St. Johns Co. Jail (104)

Video & audio recorded interview of Marcus Chamblin at DOC (1/7/21)

JPAY emails and photos to/from Marcus Chamblin from DOC

Letters to/from Marcus Chamblin from DOC



Video calls from Marcus Chamblin from DOC

**(E) Recorded Grand Jury Testimony by Defendant:**

None

**(F) Tangible Evidence from the Defendant:**

For a complete accounting of all tangible evidence from the defendant, please review all police reports, evidence logs, and property reports, chain of custody forms, and evidence submittal and tracking forms that are listed above. Such evidence should include, but may not necessarily be limited to, the following items:

See Flagler Co. Sheriff's Office Evidence/Property Receipt	27 pages
See Flagler Co. Sheriff's Office Property Receipts	4 pages
See St. Johns Co. Sheriff's Office Evidence Submittal form (Exhibit # 570.8 & 570.9)	1 page
See St. Johns Co. Sheriff's Office Digital Evidence Exam Form (Exhibit # 570.8 & 570.9)	1 page
See St. Johns Co. Sheriff's Office Property Receipts	3 pages
See St. Johns Co. Sheriff's Office Property / Evidence Transfer Receipt	1 page
See Clay Co. Sheriff's Office Evidence/Submission Collection Reports	3 pages
See RJ Lee Group Chain of Custody forms	3 pages
See FBI Chain of Custody forms	7 pages

Silver 2016 Chrysler 200, VIN #1C3CCCAB6GN163954, registered to Derrius Bauer

Vehicle key w/ lanyard

Chrysler radio VP2, serial #TVPQN3175H02E9

One (1) CD containing Infotainment analysis

Two (2) memory chips from Chrysler radio VP2

Gray hooded sweatshirt/jacket from trunk of Derrius's Bauer's car

Camouflage pants from trunk of Derrius's Bauer's car

Pink & black notebook & handwritten note on pink lined paper from Derrius Bauer's car

Cuttings from gray sweatshirt/jacket

Cuttings from camouflage pants

Apple iPhone, model A1662, IMEI #358633073887578

Apple iPhone in Blackweb case

"Motion Picture Use Only" \$20.00 & \$100.00 bills

Green leafy substance (suspected cannabis)

Two (2) small bags with white rock substance (suspected crack cocaine)

Glock pistol with magazine & ammunition

LG smart phone, model LMX220PM, serial #904VTKE0457861

**(G) Material or Information Provided by Confidential Informant:**

None

**(H) Electronic Surveillance:**

None

**(I) Search and Seizure Documents:**

Consent to Search by Joyce Marie Leach	1 page
Search Warrant for LG cell phone belonging to D'Shawn Hosang	3 pages
Search Warrant for Alcatel cell phone belonging to D'Shawn Hosang	3 pages
Search Warrant for Nextbook tablet belonging to D'Shawn Hosang	3 pages
Consent to Search for cell phone belonging to Jarvus Smith	1 page
Order to disclose phone calls of Marcus Chamblin (DOC)	11 pages
Order to disclose phone calls of Marcus Chamblin (DOC) (5/19/20)	3 pages
Search warrant for personal mail of Marcus Chamblin (DOC)	10 pages
Search warrant for Apple iCloud records	14 pages
Search warrant for Derrius Bauer's Facebook records (10/23/19)	8 pages
Search warrant for Derrius Bauer's Facebook records (11/19/19)	8 pages
Search warrant for Derrius Bauer's Google account records/data (904) 365-3803	21 pages
Search warrant for Derrius Bauer's T-Mobile & Metro PCS cell phone records	10 pages
Search warrant for download of Derrius Bauer's Apple iPhone	11 pages
Search warrant for Derrius Bauer's silver 2016 Chrysler 200 vehicle	11 pages
Search warrant for Marcus Chamblin's DNA	8 pages
Search warrant for Marcus Chamblin's Facebook records ("Marcus Johnson")	8 pages
Search warrant for Marcus Chamblin's Google account records/data	20 pages
Search warrant for Marcus Chamblin's Instagram account records	12 pages
Search warrant for Marcus Chamblin's Verizon Wireless cell phone records	10 pages
Search warrant for download of Marcus Chamblin's Apple iPhone	11 pages
Search warrant for Ray Charles' Google account records/data	21 pages
Search warrant for Ray Charles' Instagram account records	12 pages
Search warrant for Google Geo-Fence location data (10/23/19)	13 pages
Search warrant for D'Shawn Hosang's Facebook account records	8 pages
Search warrant for D'Shawn Hosang's Google account records/data	23 pages
Search warrant for D'Shawn Hosang's Instagram account records/data	12 pages
Search warrant for residence at 49 Berkshire Ln. (1/9/20)	16 pages
Search warrant for wireless router data at 49 Berkshire Ln. (1/9/20)	17 pages
Search warrant for D'Shawn Hosang's Alcatel cell phone	16 pages
Search warrant for D'Shawn Hosang's LG cell phone	16 pages
Search warrant for D'Shawn Hosang's Nextbook tablet	16 pages
Search warrant for TextNow records associated with (386) 463-3087	10 pages
Search warrant for Jarod Humphrey's Google account records/data	21 pages
Search warrant for Facebook account records ( <a href="https://www.facebook.com/crazyrodaction">https://www.facebook.com/crazyrodaction</a> )	8 pages
Search warrant for Facebook account records ( <a href="https://www.facebook.com/stevodashyit">https://www.facebook.com/stevodashyit</a> )	8 pages
Search warrant for Steven Goodhue's Google account records/data	15 pages
Search warrant for T-Mobile & Metro PCS phone records associated with (386) 868-9750	7 pages
Search warrant for download of Steven Goodhue's LG cell phone	9 pages
Search warrant for download of Steven Goodhue's Samsung Galaxy J3 Prime cell phone	9 pages
Search warrant for T-Mobile & Metro PCS phone records associated with (386) 307-4615	10 pages
Search warrant for Deon Jenkins' Facebook account records (10/23/19) (1)	8 pages
Search warrant for Deon Jenkins' Facebook account records (10/23/19) (2)	8 pages
Search warrant for Deon Jenkin's Google account records/data	13 pages
Search warrant for Marquell White Facebook account records	8 pages
Search warrant for Facebook records ( <a href="https://www.facebook.com/jesus.gutierrez.752">https://www.facebook.com/jesus.gutierrez.752</a> )	8 pages
Search warrant for Facebook records ( <a href="https://www.facebook.com/profile.php?id=10001234769438">https://www.facebook.com/profile.php?id=10001234769438</a> )	8 pages
Search warrant for Facebook records ( <a href="https://www.facebook.com/kwentel.jones.1">https://www.facebook.com/kwentel.jones.1</a> )	8 pages
Search warrant for Sprint phone records associated with (386) 264-0529	7 pages
Search warrant for Facebook account records ( <a href="https://www.facebook.com/zoe.watson.792">https://www.facebook.com/zoe.watson.792</a> )	8 pages

Search warrant for incoming/outgoing mail of Marcus Chamblin from DOC	8 pages
Court orders for recorded phone calls, emails and mail of Marcus Chamblin from DOC	
Court orders for phone calls of Marcus Chamblin from DOC	
Subpoena Duces Tecum for AT&T phone records associated with (386) 237-7123	3 pages
Subpoena Duces Tecum for AT&T phone records associated with (386) 225-5820	3 pages
Subpoena Duces Tecum for AT&T phone records associated with (386) 302-2521	3 pages
Subpoena Duces Tecum for AT&T phone records associated with (386) 446-1611	1 page
Subpoena Duces Tecum for AT&T phone records associated with (386) 972-6196	3 pages
Subpoena Duces Tecum for Pinger phone records associated with (904) 717-2621	3 pages
Subpoena Duces Tecum for T-Mobile phone records associated with (904) 365-3803	3 pages
Subpoena Duces Tecum for Marcus Chamblin's CashApp account records	3 pages
Subpoena Duces Tecum for Verizon phone records associated with (757) 316-7046	3 pages
Subpoena Duces Tecum for Charter Communications records (11/27/19)	3 pages
Subpoena Duces Tecum for Charter Communications records (1/3/20) (2)	6 pages
Subpoena Duces Tecum for Pinger phone records associated with (904) 671-9290	3 pages
Subpoena Duces Tecum for T-Mobile phone records associated with (904) 844-3865	3 pages
Subpoena Duces Tecum for TextNow phone records associated with (386) 463-3087	3 pages
Subpoena Duces Tecum for Deon Jenkins' TD Bank records	3 pages
Subpoena Duces Tecum for T-Mobile phone records associated with (386) 307-4615	3 pages
Subpoena Duces Tecum for Charter Com. phone records associated with (386) 446-8180	2 pages
Subpoena Duces Tecum for Sprint phone records associated with (386) 864-1130	3 pages
Subpoena Duces Tecum for Sprint phone records associated with (718) 781-2393 (11/26/19)	3 pages
Subpoena Duces Tecum for Sprint phone records associated with (718) 781-2393 (12/1/20)	3 pages
Subpoena Duces Tecum for Sprint phone records associated with (386) 569-4489	3 pages
Subpoena Duces Tecum for T-Mobile records associated with (757) 768-0605 (11/14/19)	3 pages
Subpoena Duces Tecum for T-Mobile records associated with (757) 768-0605 (12/1/20)	3 pages
Subpoena Duces Tecum for T-Mobile records associated with (805) 637-7249	3 pages
Subpoena Duces Tecum for T-Mobile records associated with (904) 203-3087	3 pages
Subpoena Duces Tecum for Sprint phone records associated with (352) 301-1710	3 pages
Subpoena Duces Tecum for Sprint phone records associated with (904) 572-2159	3 pages
Subpoena Duces Tecum for TextNow phone records associated with (904) 863-5848	3 pages
Subpoena Duces Tecum for T-Mobile records associated with (904) 801-6797	3 pages
Subpoena Duces Tecum for T-Mobile records associated with (386) 068-9750	3 pages
Subpoena Duces Tecum for Verizon phone records associated with (575) 649-5870	3 pages

**(J) Experts Reports:**

Dr. Predrag Bulic	Medical Examiner's Report	7 pages
	Body diagrams / sketches / notes	2 pages
NMS Labs	Toxicology Report	5 pages
Kayla Kahre	Laboratory Report (Chemistry – Submission 2)	1 page
Christopher Rishel	Laboratory Report (Firearms – Submission 3)	2 pages
Jeannelyn Adona	Laboratory Report (Biology - Submission 1)	2 pages
	Laboratory Report (Biology - Submission 2)	2 pages
	Laboratory Report (Biology – Submission 4)	2 pages

**(K) Williams Rule/Similar Fact Evidence Under F.S. § 90.404 (2)**

The State will amend and supplement with additional responses as necessary upon its discovery of such evidence that is considers relevant and admissible under Florida Law.

**(L) Other Tangible Evidence:**

For a complete accounting of all other tangible evidence, please review all police reports, evidence logs, and property reports, chain of custody forms, and evidence submittal and tracking forms that are listed above. Such evidence should include, but may not necessarily be limited to, the following items:

See Flagler Co. Sheriff's Office Evidence/Property Receipt	27 pages
See Flagler Co. Sheriff's Office Property Receipts	4 pages
See Flagler Co. Sheriff's Office Currency Verification Form	1 page
See St. Johns Co. Sheriff's Office Evidence Submittal form (Exhibit # 570.8 & 570.9)	1 page
See St. Johns Co. Sheriff's Office Digital Evidence Exam Form (Exhibit # 570.8 & 570.9)	1 page
See St. Johns Co. Sheriff's Office Property Receipts	3 pages
See St. Johns Co. Sheriff's Office Property / Evidence Transfer Receipt	1 page
See Clay Co. Sheriff's Office Evidence/Submission Collection Reports	3 pages
See RJ Lee Group Chain of Custody forms	3 pages
See FBI Chain of Custody forms	7 pages
Property/Evidence Receipts from Office of the Medical Examiner	3 pages
Deceased's Valuables and Personal Property Record	1 page
List of Deceased's Clothing and Personal Effects	1 page
Authority for Release of Body by Medical Examiner's Office to Funeral Home	1 page
ATF Firearms Trace Summary for firearm, serial #PE-1596-2018 (2)	2 pages
Saxon's Wrecker & Automotive Service Job Work Order	1 page
Red Roof Inn Plus+ records	48 pages
Verizon Business Records Certification for records for (757) 316-7046	1 page
Multi-Record Detection Report (LPR)	42 pages
Multi-Record Detection Report (LPR)	6 pages
Case Report Detail	65 pages
Records from Forever 21	141 pages
Sales Receipt #368765 from Superior Pawn & Gun & photo ID of Jade Walters	2 pages
FCSO Lead Sheets	5 pages
Preservation letters for cell phone, email and social media records	14 pages
FBI Interview Session Report (Jarod Humphrey interview on 11/29/20)	1 page

911 call by S.T.

ZetEx cell phone mapping by Flagler Co. Sheriff's Office  
FDLE mapping

Twenty dollars (\$20.00) in U.S. currency from 50 Leanni Way, #6  
Black sock found at rear of 5 Boulder Rock Dr.  
Blue latex glove found at 30 Lupi Ct.

Photographs of evidence & search of Derrius Bauer's car by Clay Co. Sheriff's Office (240)  
Photographs of camouflage pants and gray sweatshirt/jacket by Flagler Co. Sheriff's Office (15)  
Photographs of camouflage pants and gray sweatshirt/jacket by RJ Lee Group (9)

Photographs of Marcus Chamblin at Clay Co. Sheriff's Office (4)  
Video recording of Marcus Chamblin at Clay Co. Sheriff's Office

LG smart phone, model LMX220PM, serial #904VTKE0457861

DNA swab from Marcus Chamblin  
Photographs of Marcus Chamblin  
One (1) pair of white & pink colored Jordan tennis shoes, size 12 from Marcus Chamblin

Photographs of crime scene area by Flagler Co. Sheriff's Office (215)  
Photographs of evidence from area of crime scene & autopsy by Flagler Co. Sheriff's Office (108)  
Photographs of S.T.'s car & Deon Jenkins at Palm Coast Fire Station #25 (121)  
Photographs from processing S.T.'s car by Flagler Co. Sheriff's Office (137)  
Photographs of evidence from S.T.'s car by Flagler Co. Sheriff's Office (39)  
Photographs of area near Joe's NY Pizza & Pasta by Flagler Co. Sheriff's Office (32)  
Photographs from search at 49 Berkshire Ln. by Flagler Co. Sheriff's Office (316)  
Photographs from area near 1st Point Realty, 50 Leanni Way, Unit A6 (4)  
Photographs from area near Safe Haven Veterinary Hospital by Flagler Co. Sheriff's Office (3)  
Photographs of multi-colored blankets and pants (40)  
Photographs from search of 59 Bruning Ln.

Cropped & enhanced photographs by FBI (59)

Autopsy photographs by the Medical Examiner's Office (75)  
Scene photographs by the Medical Examiner's Office (21)  
X-ray images by the Medical Examiner's Office (9)  
Major case prints from Deon Jenkins  
DNA card from Deon Jenkins  
Pair of shoes from Deon Jenkins  
Black t-shirt from Deon Jenkins  
Socks, underwear, pants & shoelaces from Deon Jenkins  
Fifty cents in coins from pants pocket of Deon Jenkins  
Nail clippings from Deon Jenkins  
Projectile & jacket from body of Deon Jenkins  
Sheet from within body bag transporting Deon Jenkins

Tan 2013 Chevrolet Malibu, VIN #1G11H5SA2DF156732, registered to S.T.  
Keys to Chevrolet Malibu belonging to S.T.  
Driver's license & two debit cards belonging to Deon Jenkins  
Apple iPhone charge cord & plug from Deon Jenkins  
Syringe & plastic spook from pants of Deon Jenkins  
Swab of substance from syringe  
XCAT GSR sampling cards

Orange hooded jacket from front passenger seat of S.T.'s car  
Napkin w/ loose cigarettes from driver's side of S.T.'s car  
Metal spoon & blue plastic straw from driver's door of S.T.'s car  
White Owl cigarillo wrapper w/ 2 cannabis cigarettes from driver's door of S.T.'s car  
Projectiles & fragments from rear & front passenger area of S.T.'s car

Sixteen (16) fired shell casings, marked with "Tulammo 7.62x39" headstamp

One (1) brown Winston cigarette butt  
Two (1) brown cigarette butts  
One (1) white cigarette butt  
Swab of headstamps of shell casings  
One (1) blue "Natty Daddy" can  
One (1) small brown paper bag  
One (1) pair of black Uline gloves  
One (1) latent lift car from blue "Natty Daddy" can  
Two (2) XCAT GSR sampling cards  
Two (2) swabs of possible DNA from ground  
Swab from mouth of "Natty Daddy" can  
Swab from inside of black Uline gloves

One (1) thick wide stripe blanket from master bedroom dresser  
One (1) multi-colored zig-zag knitted blanket from laundry room  
One (1) brightly-colored striped blanket with fringe from laundry room  
One (1) pair of distressed denim jeans from master bedroom  
One (1) copper jacketed projectile

One (1) pair of black Victorious premium jeans  
Shoes, socks, tank top & polo shirt from Deon Jenkins  
Twenty dollars U.S. currency  
Piece of an unknown white tablet from black Victorious jeans  
One (1) white tissue & one (1) Blistex chapstick from black Victorious jeans  
Red shirt recovered from woodline

Audio recording of attempted phone call to Kalista Howell (1/14/20)  
Audio recording of attempted contact with Dalton Kinney (11/12/19)  
Audio recording of attempted contact with Jeremiah Torres (10/13/19)  
Audio recording of attempted contact with Jeremiah Torres (10/16/19)  
Audio recording of attempted phone call to Jeremiah Torres (10/16/19)  
Audio recording of attempted contact with Jordan Cheney (10/17/19)  
Audio recording of attempted contact with Joshua Ortiz (10/22/19)  
Audio recording of attempted phone call to Karen Jackson (10/23/19)  
Audio recording of attempted phone call to Karen Jackson (10/31/19)  
Audio recording of attempted contact with Lance York (10/17/19)  
Audio recording of attempted phone call to Michael Connelly (10/17/19)  
Audio recording of attempted phone call to Michael Connelly (10/17/19)  
Audio recording of attempted phone call to Robert Murphy (11/12/19)  
Audio recording of attempted contact with Robert Murphy (10/24/19)  
Audio recording of attempted contact with Robert Murphy (5/11/20)  
Audio recording of attempted contact with Quiaudry Williams (12/4/19)  
Audio recording of attempted contact with Julie Johnson (12/12/19)  
Audio recording of attempted contact with Karrah Mongone (7/17/20)  
Audio recording of voicemail left for La'Hazel Williams (12/4/20)  
Audio recording of attempted phone call to Tatyana Beaulieu (10/31/19)  
Audio recording of attempted phone call to Tatyana Beaulieu (11/8/19)

Audio recording from search at 49 Berkshire Ln. (1/10/20)  
Audio recording of execution of search warrant for Marcus Chamblin's DNA (11/21/19)  
Audio recording from search at 59 Bruning Ln. (10/21/19)  
Audio recording from search of 59 Bruning Ln. (10/15/19)

Audio recordings of death notification to Davis family (2)  
Audio recorded phone call with "TJ" from Hampton, VA

Video from 6 Beverly Place  
Video from Bealls  
Video from Chick-fil-a  
Video from Circle K  
Video from CVS  
Video from Daily's  
Video from Econo Lodge  
Video from Joe's NY Pizza  
Video from Palm Coast Library  
Video from Palm Coast Methodist Church  
Video from Palm Coast Pawn & Jewelry  
Video from Pet Supermarket  
Video from Publix  
Video from Safe Haven Veterinary Hospital  
Video from Space Coast Credit Union  
Video from Sunshine Academy  
Video from Take 5 Oil Change  
Video from 13 Brunswick Ln.  
Video from 22 Ballard Ln.  
Video from Blaze N Flame  
Video from Wal-Mart  
Fitzgerald surveillance video

Download of Derrius Bauer's cell phone  
Download of Marcus Chamblin's cell phone  
Download of D'Shawn Hosang's cell phone  
Download of Jarvus Smith's cell phone  
Download of Deon Jenkins' cell phone  
Download of S.T.'s cell phone  
Download of Infotainment Center from Derrius Bauer's vehicle  
Download of Steven Goodhue's cell phones

Apple iCloud records  
Derrius Bauer Facebook records  
Derrius Bauer Google account records  
Derrius Bauer's T-Mobile & Metro PCS cell phone records  
Marcus Chamblin's ("Marcus Johnson") Facebook records  
Marcus Chamblin's Google account records  
Marcus Chamblin's Instagram account records  
Marcus Chamblin's Verizon Wireless cell phone records  
Ray Charles' Google account records  
Ray Charles' Instagram account records  
Letter from Google responsive to search warrant for Geo-Fence location data (1/28/20) ("Phase 1")  
Letter from Google responsive to search warrant for Geo-Fence location data (3/3/20) ("Phase 2")  
Geo-Fence mapping  
D'Shawn Hosang's Facebook account records  
D'Shawn Hosang's Google account records  
D'Shawn Hosang's Instagram account records  
TextNow records associated with (386) 463-3087

T-Mobile & Metro PCS phone records associated with (386) 307-4615  
Deon Jenkins Facebook account records (2)  
Deon Jenkins Google account records  
Marquell White Facebook account records  
Austin Flores Facebook account records (<https://www.facebook.com/crazyrodaction>)  
Steven Goodhue Facebook account records (<https://www.facebook.com/stevodashyt>)  
Steven Goodhue Google account records/data  
Facebook account records (<https://www.facebook.com/jesus.gutierrez.752>)  
Facebook account records (<https://www.facebook.com/profile.php?id=10001234769438>)  
Facebook account records (<https://www.facebook.com/kwentel.jones.1>)  
Facebook account records (<https://www.facebook.com/zoe.watson.792>)

AT&T phone records associated with (386) 225-5820  
AT&T phone records associated with (386) 302-2521  
AT&T phone records associated with (386) 446-1611  
AT&T phone records associated with (386) 972-6796  
Pinger phone records associated with (904) 717-2621  
T-Mobile phone records associated with (904) 365-3803  
Marcus Chamblin's CashApp account records  
Verizon phone records associated with (757) 316-7046  
Charter Communications records  
Pinger phone records associated with (904) 671-9290  
TextNow phone records associated with (386) 463-3087  
T-Mobile phone records associated with (386) 307-4615  
Sprint phone records associated with (386) 864-1130  
Sprint phone records associated with (718) 781-2393  
T-Mobile phone records associated with (757) 768-0605  
T-Mobile records associated with (805) 637-7249  
T-Mobile records associated with (904) 203-3087  
Sprint phone records associated with (352) 301-1710  
Sprint phone records associated with (904) 572-2159  
TextNow phone records associated with (904) 863-5848  
T-Mobile records associated with (904) 801-6797  
Verizon phone records associated with (575) 649-5870  
T-Mobile records associated with (386) 868-9750  
Sprint phone records associated with (386) 264-0529



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

**CASE NUMBER: 21-00024-CFFA FELONY**

**STATE OF FLORIDA**

**Plaintiff,**

**vs.**

**DERRIUS BRAXTON BAUER  
Defendant.**

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**DEMAND FOR RECIPROCAL DISCLOSURE**

COMES NOW the State of Florida through its undersigned Assistant State Attorney, pursuant to Florida Rules of Criminal Procedure, Rule 3.220(d) and demands the following reciprocal disclosures:

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.

I HEREBY CERTIFY that a true copy hereof has been furnished to the Office of Ann E. Finnell, 2114 Oak St., Jacksonville, FL 32204, by U.S. Mail, electronic mail, or e-service delivery on February 22, 2021.

s/K. MARK JOHNSON

ASSISTANT STATE ATTORNEY  
FLORIDA BAR #: 0378320  
2446 DOBBS ROAD  
ST AUGUSTINE, FL 32086  
ESERVICEFLAGLER@SAO7.ORG  
(904) 209-1300