

IN THE CIRCUIT COURT OF THE
EIGHTEENTH JUDICIAL CIRCUIT, IN
AND FOR BREVARD COUNTY, FLORIDA

CASE NO. 05-2013-CF-064037-AXXX-XX

STATE OF FLORIDA,

Plaintiff,

vs.

MITCHELL A. NEEDELMAN,

Defendant.

SCOTT ELLIS
2013 SEP 10 AM 10:05
FILED IN TVL-01
CLERK OF CIR. CT.
BREVARD CO. FL.

NOTICE OF DEFENDANT'S INTENT
TO PARTICIPATE IN DISCOVERY

The Defendant, by and through his undersigned attorney and pursuant to Fla.
R. Crim. P. 3.220(b)(1), hereby serves notice of his intent to participate in discovery and
requests the following information to be provided by the prosecution for inspection,
copying, testing or photographing:

1. The names and addresses of all persons known to the prosecutor to
have information which may be relevant to the offense charged, and to any defense with
respect thereto; and

2. The statement of any person 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 the
person, and also includes any statement 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 police reports or report summaries, together with the name and address of each witness to the statements.

4. Any written or recorded statements and the substance of any oral statements made by a co-defendant if the trial is to be a joint one.

5. Those portions of 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 and any documents relating thereto.

10. 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.

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

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

13. Any prior criminal record of Defendant, co-conspirator, confidential informant, or witness in actual or constructive possession of the prosecution.


14. The substance of any plea bargaining or plea arrangement made between any potential co-conspirator, confidential informant, or witness and the prosecution of any other agency.

15. Any material information within the State's possession or control which tends to negate the guilt of the accused.

The undersigned certifies that this Notice is filed in good faith pursuant to Fla. R. Crim. P. 3.220(n)(3).

WHEREFORE, the Defendant, by and through the undersigned counsel respectfully requests the prosecution to provide the above information within fifteen (15) days after service of this Notice pursuant to Rule 3.220(b)(1).

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by
U.S. Mail to the Office of the State Attorney, Felony Division, 2725 Judge Fran Jamieson
Way, Bldg. D, Viera, FL 32940, this 9th day of September, 2013.



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