

IN THE CIRCUIT COURT FOR PINELLAS COUNTY, FLORIDA
15-00226-CF
SECTION I

STATE OF FLORIDA

vs.

JOHN NICHOLAS JONCHUCK, JR Person ID: 2923683

MOTION TO COMPEL ADDITIONAL DISCOVERY: VIDEO OF EMILY LAZAROU'S
EVALUATION OF DEFENDANT

The Defendant, by and through undersigned counsel, respectfully requests this Honorable Court to enter its Order compelling the State to provide to defense counsel a copy of the videotaped evaluation of Defendant recorded October 24, 2017 and May 15, 2018, pursuant to FLA. R. CRIM. P. 3.220. As grounds for this motion the Defendant would show:

1. Defendant filed Demand for Discovery January 12, 2015.
2. On October 24, 2017, and May 15, 2018, Dr. Emily Lazarou conducted a video / audio-recorded evaluation of Defendant. The State video-taped the evaluation both days and has a copy of those videos in their possession and control.
3. Defense counsel has not been provided a copy of those videos. Defendant is entitled to a copy of the video / audio recordings as they contain recorded statements made by Defendant and recorded statements made by listed witness, Emily Lazarou. FLA. R. CRIM. P. 3.220 (b)(1)(B); (b)(1)(C).

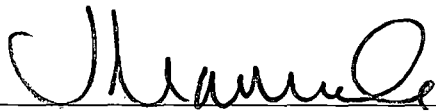
The defendant files this motion, and makes all other motions and objections in this case, whether or not specifically noted at the time of making the motion or objection, on the following grounds and authorities: The Due Process Clause, the Right to a Fair Trial by an Impartial Jury, the Rights to Counsel, Equal Protection, Confrontation, and Compulsory Process, the Rights to Remain Silent and to Appeal, and the Right to be Free from Cruel and Unusual Punishment, pursuant to the Federal and Florida Constitutions generally, and specifically the Fifth, Sixth, Eighth, Ninth, Tenth, and Fourteenth

Amendments to the United States Constitutions, and Article I, sections 2, 9, 16, 17, 21, and 22 of the Florida Constitution.

NOTICE OF HEARING

YOU ARE NOTIFIED that the above will be heard before the Honorable Chris Helinger, County Justice Center, 14250 49th Street North, Clearwater, Fl 33762, on November 5, 2018 at 2:00 p.m.

I do certify that a copy hereof has been furnished by email/physical delivery to the State Attorney, County Justice Center, Clearwater, Florida, on November 2, 2018.



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GREG WILLIAMS,
Fla. Bar Number: 635103,
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