THE CIRCUIT COURT PINELLAS COUNTY, FLORIDA

THOMAS ISAIAH MOSLEY 23-03157-CF - K **ANSWER TO DEMAND FOR DISCOVERY**
PID: 3322179

The State of Florida, through the State Attorney of the Sixth Judicial Circuit, pursuant to the defendant's Notice of Discovery and RCrP 3.220, submits the following information:

1. The names and address of all persons known to the prosecutor to have information which may be relevant to the offense charged, and to any defense thereto or to any similar fact evidence to be presented at trial, are set forth in the witness list.
2. The witness list is not all-inclusive as there may be further names and address contained in witness statements and police report supplied in this answer.
3. The following items as indicated are in the State's possession or control and are available for your inspection at the State Attorney's Office upon timely and reasonable notice. If you desire to copy and/or photograph same, copies will be provided upon signed receipt. The name(s) of confidential informant(s) will not be supplied unless the State intends to use same as witness(es) at the trial or unless ordered by the court

		Yes	No
a.	Statements given by persons listed in paragraph 1 above.	☒	☐
b.	Written, recorded, and/or oral statements of the accused.	☒	☐
c.	Written, recorded, and/or oral statements of co-defendants.	☐	☒
d.	Material or information provided by a confidential informer.	☐	☒
e.	Tangible papers not obtained from or belonging to accused which the State intends to use at hearing or trial.	☒	☐
f.	Tangible papers obtained from or belonging to accused.	☒	☐
g.	Electronic surveillance of premises of accused or of conversations to which accused was party.	☒	☐
h.	Documents relating to search or seizure.	☒	☐
i.	Reports or statements of experts.	☒	☐

4. All tangible objects as provided by RCrP 3.220, unless otherwise indicated below, may be inspected, photographed, or tested during regular and ordinary business hours at:

a. SPPD b. SAO

This document will serve as authorization for the attorney for the defendant, JESSICA MANUELE, or designated representative, to conduct discovery of tangible objects, in this case, with reference to law enforcement case numbers as follows:

a. 23012060 SPPD b. 5023-109487

5. By this Answer to Demand for Discovery, the State expects the defendant to submit a corresponding witness list and exhibit list within fifteen days and comply with all requirements of RCrP 3.220.
6. At this time, the State is aware of the following evidence which falls within the purview of RCrP 3.220(b)(4), if any:

NONE

Any and all evidence listed in reports provided on discovery as well as any and all evidence contained on evidence.com related to offense number listed above.

St. Petersburg Police Department maintains most digital evidence, including body worn camera and fleet cruiser videos, surveillance videos, and photographs on evidence.com. This evidence may be obtained by sending an email to Police.discovery@stpete.org with a copy of the Answer to Demand and your notice of appearance. Upon confirming you are the attorney of record, they will email you a link to access the evidence. To avoid delay, please ensure that you send the correct offense report number.