

IN THE CIRCUIT COURT FOR PINELLAS COUNTY, FLORIDA
CRIMINAL DIVISION

CASE NO.: 23-03157-CF
SECTION: K
JUDGE: SUSAN ST. JOHN

STATE OF FLORIDA,

Vs.

THOMAS ISAIAH MOSLEY.

AMENDED RECIPROCAL WITNESS AND EVIDENCE LIST

The Defendant files the following amended reciprocal witness as follows:

1. All State's witnesses. In particular:
 - a. PCSO Cpl. Jacqueline Kaplan
2. All State's evidence.
3. Additional Defense witnesses. In particular:
 - a. Ms. Desiree Baker, Forensic Services Case Manager, Suncoast Center, Inc., 3800 Central Avenue, St. Petersburg, FL 33711
 - b. Ms. Jessica Daws, 8253 Eagles Park Drive North, St. Petersburg, FL 33709
 - c. Ms. Sarah Franklin, 700 Allendale Court N., St. Petersburg, FL 33704
4. Additional Defense evidence:
 - a. Suncoast Client Services Progress Notes – October 2023 through June 2025 (sent via email July 2, 2025)
 - b. Certified Copies of Thomas Mosley's Traffic Case Dockets (sent via email June 30, 2025)
 - c. Final Report of Dr. Valerie McClain (sent via email July 2, 2025)
 - d. Final Report of Dr. Amy Fritz (to be sent via email no later than July 3, 2025)

Pursuant to § 914.03, FLA. STAT., a witness summoned shall remain available for attendance until the case for which the witness was summoned is disposed of or until excused by the court.

Furthermore, Pursuant to Administrative Order 82-59, all subpoenas for trial of witnesses issued by the State Attorney shall be for the use and benefit of the State Attorney and the Public Defender and the State Attorney shall release no such witnesses from the necessity of appearance without the consent of the Public Defender or the Court.

I do certify that a copy hereof has been furnished by email/physical delivery to the State Attorney, County Justice Center, Clearwater, Florida, on July 2, 2025.

Julia Seifer-Smith

JULIA B. SEIFER-SMITH, Attorney at Law

Fla. Bar Number: 86567, For

PUBLIC DEFENDER, SIXTH JUDICIAL CIRCUIT

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