

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PASCO COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION

STATE OF FLORIDA,
Plaintiff,

Case No.: CRC-1400216FAES

v.

Division: 1

CURTIS J. REEVES,
Defendant.

**DEFENDANT'S SIXTH AMENDED NOTICE OF RECIPROCAL DISCOVERY AND
NOTICE OF ADDITIONAL WITNESS**

COMES NOW, the Defendant, CURTIS J. REEVES, in response to the State's written Notice of Discovery and pursuant to Fla.R.Crim.P. 3.220(d), furnishes the following information:

1. Pursuant to Fla.R.Crim.P. 3.220(d)(1)(A), the Defendant expects to call the following (additional) person as a witness at the trial or hearing:

A. Gino Sassani, 5402 Venetia Pl, Tampa, FL 33617; (813) 988-7210
(authentication of movie trailers)

2. Pursuant to Fla.R.Crim.P. 3.220(d)(1)(B), below is a list of the additional information and additional material within the Defendant's possession or control which will be produced for the State to inspect, copy, test, and/or photograph:

A. Statements

Any and all witness statements made at the bond hearing in February 2014 (both print and video);

- 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:**

BEK TEK LLC/Bruce Koenig

Curriculum Vitae – Bruce Koenig

Thumb Drive - Bitmap images from Q6

Hard drive - Copy of Q6 specimen (copy of 4AWS)

DVDs:

- (i) DVD dated 2/8/2017 – Camera 12 video files from specimen Q6
- (ii) DVD dated 2/9/2017 – Camera 11 video files from specimen Q6
- (iii) DVD – Camera 11 video files (playback 25%) from specimen Q6 (same video as (ii))
- (iv) DVD dated 2/9/2017 – Camera 11 video files (loops) from specimen Q6
- (v) DVD – Camera 11 video files (loops) (playback 25%) from specimen Q6 (same video as (iv))
- (vi) DVD dated 2/10/2017 – Camera 11 video files from specimen Q6
- (vii) DVD – Camera 11 video files (playback 25%) from specimen Q6 (same video as (vi))
- (viii) DVD dated 2/10/2017 – Camera 11 bitmap images from specimen Q6
- (ix) DVD dated 2/11/2017 – Timeline video files from specimen Q6
- (x) DVD – Timeline video files (playback 25%) from specimen Q6 (same video as (ix))

Knox & Associates, LLC (i.e. Michael Knox)

Powerpoint presentation (PDF – still to be modified)

C. Tangible items and/or objects that the Defendant intends on introducing at a hearing/trial

Tree climbing video of Vivian Reeves;

Receipt for Benelli Super Sport shotgun;

DVD containing movie trailers played on January 13, 2014.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to Office of the State Attorney for the Sixth Judicial Circuit, c/o Glenn Martin, Esq., P.O. Box 5028, Clearwater, Florida 33758; this 17th day of February, 2017.

/s/:Dino Michaels

Dino Michaels, Esquire
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