

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY
2014CF000216CFAXES-1

STATE OF FLORIDA

V.

CURTIS JUDSON REEVES

**STATE'S MOTION TO REMOVE EXHIBIT TAGS FROM EVIDENCE
INTRODUCED AT DEFENDANT'S IMMUNITY HEARING AND AFTER
REMOVAL TO TAKE POSSESSION OF THE EVIDENCE FROM THE CLERK**

Filed For Record
Pasco County, Florida
2020 JUN 24 PM 3:11
Clerk & Comptroller
Pasco County, Florida

COMES NOW, Bernie McCabe, State Attorney, for the Sixth Judicial Circuit in and for Pasco County, Florida, by and through the undersigned Assistant State Attorney hereby respectfully requests this Honorable Court to enter an order directing the Sixth Judicial Circuit, Pasco Clerk of Court and Comptroller, after the removal of evidence tags to allow the State to take possession of the below specifically identified exhibits (See Exhibit #1, attached) that were introduced into evidence during the Defendant's immunity hearing so said evidence can be introduced as evidence in the above-styled cause and as good cause would show:

1. The Defendant is charged by Information with Second Degree Murder.
2. During the Defendant's immunity hearing the State and the defense introduced evidence that is relevant and material to proving the State's case.
3. The State is requesting the items introduced in evidence during the Defendant's immunity hearing be immediately turned over to the State, so the State may use the evidence at the Defendant's trial, scheduled to begin on October 19, 2020.

4. With the assistance of the Clerk, the evidence tags used during the Defendant's immunity hearing will be removed and the evidence turned over to a Pasco Sheriff's Office, Evidence Unit, clerk, who will transport said evidence to the Pasco Sheriff's Office where it will be logged in and maintained until it is needed by the State to prepare their witnesses for trial and/or as evidence at trial.
5. The State has no objection to defense counsel being present during the process.

WHEREFORE, the State of Florida respectfully requests this Honorable Court to enter its order granting the State's motion to have the Pasco Clerk of Court and Comptroller release the specifically listed evidence identified in Exhibit #1, attached, that was admitted in evidence at the Defendant's immunity hearing so that said evidence may be introduced at the Defendant's trial.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion To Remove Exhibit Tags From Evidence Introduced At Defendant's Immunity Hearing And After Removal To Take Possession Of The Evidence From The Clerk was furnished to Richard Escobar, Esq., Attorney for the Defendant, at 2917 West Kennedy Blvd., Suite 100, Tampa, FL 33609-3163, by U.S. Mail or Personal Service this 24th day of June, 2020.

BERNIE McCABE, State Attorney
Sixth Judicial Circuit of Florida

By: 

Glenn L. Martin, Jr.
Assistant State Attorney
Bar No. 435988
P.O. Box 5028
Clearwater, FL 33758
(727) 464-6221

EXHIBIT #1

Evidence Requested Returned to State

Defense Exhibits

Exhibit # 29

Object ID: 5081417

Description: Bag containing Black Sneaker

Exhibit # 33

Object ID: 5082629

Description: White iPhone with Black Protective Case

Exhibit # 34

Object ID: 5082688

Description: Composite CD of Curtis Reeves Interview

Exhibit # 38

Object ID: 5083087

Description: AP-01 Keltec .380 Auto Handgun Serial #JV135

Exhibit # 39

Object ID: 5083088

Description: Corbon .380 Auto Bullets (Casings)

Exhibit # 40

Object ID: 5083090

Description: AP-03 Magazine

Exhibit # 41

Object ID: 5083092

Description: 1AP Black Holster

Exhibit # 49

Object ID: 5084163

Description: CD Alan Hamilton's Interview

State Exhibits

Exhibit # 1

Object ID: 4085772

Description: Ticket Stubs

Exhibit # 1

Object ID: 5084116

Description: Empty Popcorn Bag

Exhibit # 2
Object ID: 5084117
Description: Photo Image 1755

Exhibit # 2
Object ID: 4085773
Description: Photo of Gun

Exhibit # 3
Object ID: 5084119
Description: Composite Photos (3)

Exhibit # 3-A
Object ID: 4087762
Description: Composite Photos (5)

Exhibit # 4
Object ID: 4087825
Description: Audio CD - Reeves Interview

Exhibit # 4
Object ID: 5084120
Description: Composite Photos (2)

Exhibit # 5
Object ID: 4087827
Description: Audio CD - Vivian Reeves

Exhibit # 5
Object ID: 5084121
Description: Pair of Nike Shoes

Exhibit # 6
Object ID: 4087843
Description: Audio CD - Nicole Oulson

Exhibit # 6
Object ID: 5084122
Description: Photograph of Nike Shoe

Exhibit # 7
Object ID: 4087970
Description: Video DVD - Theatre View

Exhibit # 7
Object ID: 5084123
Description: Composite Photos (2)

Exhibit # 8
Object ID: 5084124
Description: Composite Photos (2)

Exhibit # 9
Object ID: 5084131
Description: Composite Calibration Certificates Lecia 3D Scanner
(3)

Exhibit # 10
Object ID: 5084141
Description: Composite Scans 3-8

Exhibit # 11
Object ID: 5084172
Description: Dr. Thogmartin's CV

Exhibit # 12
Object ID: 5084186
Description: Composite MEO Photos (5)

Exhibit # 13
Object ID: 5084187
Description: Composite Photos of Nicole's Fingers (22)

Exhibit # 14
Object ID: 5084536
Description: Beach Photo

Exhibit # 15
Object ID: 5084567
Description: 3 Flash Drives