

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

Filed For Record  
Pasco County, Florida  
2022 JAN 13 AM 11:31  
NIKKI ALVAREZ-SOWLES  
Clerk & Comptroller  
Pasco County, Florida

**JOINT MOTION TO RETURN  
EVIDENCE INTRODUCED AT DEFENDANT'S  
IMMUNITY HEARING TO THE RESPECTIVE PARTIES**

COMES NOW, Bruce Bartlett, State Attorney, for the Sixth Judicial Circuit in and for Pasco County, Florida, by and through the undersigned Assistant State Attorney and Richard Escobar, Esq., Attorney for the Defendant hereby jointly request this Honorable Court to enter an order directing the Sixth Judicial Circuit, Pasco Clerk of Court and Comptroller, to return to the State and Defense the exhibits 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 at trial and any defenses the Defendant may have at trial.
3. The State and the Defense are requesting the items introduced in evidence during the Defendant's immunity hearing immediately be turned over to the respective parties, so the parties may use the evidence at the Defendant's trial, scheduled to begin on February 7, 2022.

4. During the immunity hearing the Defense submitted as defense exhibits evidence held by the Pasco Sheriff's Office and exhibits generated or obtained from their experts or witnesses. Said evidence was marked by the clerk with a defense evidence tag. The State also submitted evidence held by the Pasco Sheriff's Office. The Defendant's Writ of Prohibition challenging the denial of immunity pursuant to Ch. 776.032 was denied. *Reeves v. State*, 250 So.3d 31 (Fla. 2<sup>nd</sup> DCA 2018) 2018 WL 4055491. The evidence submitted during the immunity hearing is no longer needed.
5. The State requests the Clerk of Court to turn over to the State or a representative of the Pasco Sheriff's Office, State and defense exhibits consisting of evidence previously held by the Pasco Sheriff's Office. The evidence will be transport to the Property/Evidence Section of 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. See, attached #1 - Evidence Requested Returned to State.
6. The Defense requests the Clerk of Court to turn over to a representative of Escobar & Associates, 2917 W Kennedy Blvd #100, Tampa, FL 33609, Attorney for the Defendant defense exhibits consisting of evidence generated or obtained from defense experts or witnesses. The evidence will be transport to a location of the Defendant's choosing and maintained until need for trial. See, attached #2 - Evidence Requested Returned to Defense.
7. To prevent damage to the returned exhibits, the State and the defense agree, to the extent possible and practical not to remove the clerk's immunity hearing tags and to place the trial exhibit tags over the previous tags. If, however, the tags can be removed without casing damage, trial exhibit tags will be substituted for the immunity hearing tags.
8. The Stipulated Order Concerning Waiver of Authenticity and Chain of Custody Objections To Specifically Identified Evidence, accepted by the Court on January 24, 2017 remains in affect. To the extent the exhibits returned to the parties is not covered by the stipulation, the parties agree to waive objections to authenticity and chain of custody.


9. The State and Defense agree the Court may rely on the joint motion and requests without further argument immediately sign the Order granting the joint motion.

**WHEREFORE**, the State of Florida and the Attorney for the Defendant respectfully requests this Honorable Court to enter its order granting the JOINT MOTION TO RETURN EVIDENCE INTRODUCED AT DEFENDANT'S IMMUNITY HEARING TO THE RESPECTIVE PARTIES so that said evidence may be introduced at the Defendant's trial.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing JOINT MOTION TO RETURN EVIDENCE INTRODUCED AT DEFENDANT'S IMMUNITY HEARING TO THE RESPECTIVE PARTIES was furnished to Richard Escobar, Esq., Attorney for the Defendant, at 2917 West Kennedy Blvd., Suite 100, Tampa, FL 33609-3163, by Email at rescobar@escobarlaw.com 1/21 day of January 2022.

Bruce Bartlett, State Attorney  
Sixth Judicial Circuit of Florida

  
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# Attachment #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 # 35

Object ID: 5082689

Description: Transcript of Curtis Reeves Statement

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 # 44

Object ID: 5083736

Description: Retired ID Card

Exhibit # 45

Object ID: 5083737

Description: Wallet with Retired Tampa Police Badge

Exhibit # 46  
Object ID: 5083738  
Description: Concealed Weapon License

Exhibit # 47  
Object ID: 5083739  
Description: Firearms Proficiency Card

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

**Attachment #2, Evidence  
Requested Returned to Defense**

Revised: 1/6/22 1800 hrs.

**Defense Exhibits**

Exhibit # 1  
Object ID: 4085470  
Description: Voluntary Statement Form

Exhibit # 1  
Object ID: 5080013  
Description: Thumb Drive Theatre Photograph/s Composite

Exhibit # 2  
Object ID: 5080039  
Description: CV - Michael Foley, MD

Exhibit # 2  
Object ID: 4085774  
Description: Voluntary Statement Form

Exhibit # 3  
Object ID: 4085775  
Description: Voluntary Statement form

Exhibit # 3  
Object ID: 5080042  
Description: MRI's Curtis Reeves

Exhibit # 4  
Object ID: 4087971  
Description: Redacted Autopsy Report

Exhibit # 4  
Object ID: 5080043  
Description: XRays of Curtis Reeves

Exhibit # 5  
Object ID: 4088157  
Description: Hard Drive

Exhibit # 5  
Object ID: 5080114  
Description: CV - Donna Cohen, PhD



Exhibit # 6  
Object ID: 4088037  
Description: Composite DVDS (5)

Exhibit # 6  
Object ID: 5080115  
Description: Movie Previews/Trailers DVD

Exhibit # 7  
Object ID: 5080468  
Description: Theatre Photos Thumb Drive

Exhibit # 8  
Object ID: 5080516  
Description: Seagate Hard Drive

Exhibit # 9  
Object ID: 5080517  
Description: Seagate Hard Drive

Exhibit # 10  
Object ID: 5080549  
Description: Video DVD 1406270 Q6 Timeline

Exhibit # 11  
Object ID: 5080582  
Description: Direct, Enhanced, Magnified, & Speed Adjusted Video Copies

Exhibit # 12  
Object ID: 5080611  
Description: Bitmap Images

Exhibit # 13  
Object ID: 5080601  
Description: One-Minute Loops of Enhanced/Magnified Video Copies

Exhibit # 14  
Object ID: 5080644  
Description: 1 Minute Loops of Enhanced / Magnified Video Copies

Exhibit # 15  
Object ID: 5080657  
Description: Bitmap Images "Cam 12" Video

Exhibit # 16  
Object ID: 5080675  
Description: Enhanced/2x Magnified / Quarter Speed Video

Exhibit # 17  
Object ID: 5080678  
Description: Direct / Quarter-Speed Video

Exhibit # 18  
Object ID: 5080679  
Description: Enhanced / Quarter-Speed Video Copy

Exhibit # 19  
Object ID: 5080680  
Description: Direct/2x Magnified/Quarter Video Copy

Exhibit # 20  
Object ID: 5080681  
Description: Direct, Enhanced & Speed Adjusted Video Copies

Exhibit # 21  
Object ID: 5080682  
Description: Bitmap Images "Cam 11"

Exhibit # 22  
Object ID: 5080683  
Description: Hard Drive Containing Bitmaps

Exhibit # 23  
Object ID: 5081070  
Description: Thumb Drive Containing 9 Photos of Cobb Grove Theatre DVD Room

Exhibit # 24  
Object ID: 5081071  
Description: Thumb Drive Containing 2 Photos of Curtis Reeves

Exhibit # 25  
Object ID: 5081131  
Description: Composite Voluntary Statement Forms

Exhibit # 26  
Object ID: 50814109  
Description: Thumb Drive Theatre Photographs

Exhibit # 27  
Object ID: 5081411  
Description: Enlarged Photo of Defendant's Face

Exhibit # 28  
Object ID: 5081416  
Description: Enlarged Photo Defendant's Hands

Exhibit # 30  
Object ID: 5082623  
Description: CV - Vernard Adams

Exhibit # 31  
Object ID: 5082624  
Description: Thumb Drive Medical Examiner's Photographs

Exhibit # 32  
Object ID: 5082627  
Description: Thumb Drive of 12 Photographs of Nicole Oulson's Hand

Exhibit # 36  
Object ID: 5083028  
Description: CV - Michael Knox

Exhibit # 37  
Object ID: 5083085  
Description: Thumb Drive PowerPoint Presentation

Exhibit # 42  
Object ID: 5083699  
Description: Composite Law Enforcement Certificates

Exhibit # 43  
Object ID: 5083700  
Description: Composite Bush Gardens Certificates

Exhibit # 50  
Object ID: 5084941  
Description: CV - Bruce E. Koenig