

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY  
CRC14-00216CFAES

STATE OF FLORIDA

V.

CURTIS J. REEVES

**STATE'S MOTION TO COMPEL THE PRODUCTION  
OF MATERIAL IDENTIFIED BY DR. COHEN DURING  
HER DEPOSITION THAT ARE AVAILABLE FOR REVIEW BY THE STATE**

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 request this Honorable Court to enter an order compelling the Defendant to immediately provide to the State copies of information and materials, Dr. Cohen identified during her deposition that are available for review by the State and as good cause would show:

1. The State took the deposition of defense expert Dr. Donna Cohen on July 30, 2016.
2. During the deposition, Dr. Cohen identified various documents that are available for review by the State. Dr. Cohen identified the course outline she uses to teach "threat assessment" / "violence assessment" to other professionals. (Deposition pages 1, 147 – 149, attached.)
3. On July 6, 2016 the State made a written request through defense counsel for the above-described material asking the material be provided by August 1, 2016.
4. On August 25, 2016, after the State on several occasions agreed to extend the deadline for the above-described material, received all of the requested material with the exception of the course outline.
5. The State is requesting copies of the following documents identified by Dr. Cohen:
  - The current curriculum outline / presentation / handouts / photographs compiled by Dr. Cohen and used when she teaches to other professionals Threat Assessment and the use of "Threat Assessment Tool" she described in her deposition.

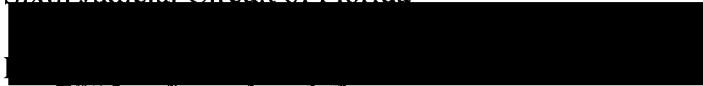
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TANIA S. O'NEILL  
Clerk & Computer  
Pasco County, Florida

WHEREFORE, the State respectfully requests this Honorable Court to enter an order directing the Defendant, through defense counsel, to immediately provide the State with the above-described material.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the State's Motion To Compel The Production of Material Identified By Dr. Cohen During Her Deposition That Are Available For Review By The State was furnished to Richard Escobar, Esq., Escobar & Associates, P.A., 2917 West Kennedy Blvd., Ste 100, Tampa, FL 33609, Attorney for the Defendant by U.S. Mail / Hand / Facsimile this 9<sup>th</sup> day of September, 2016.

BERNIE McCABE, State Attorney  
Sixth Judicial Circuit of Florida



  
Glenn L. Martin, Jr.  
Assistant State Attorney

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IN THE CIRCUIT COURT FOR PASCO COUNTY, FLORIDA

CASE NO. CRC14-00216CFAES

STATE OF FLORIDA

vs.

CURTIS J. REEVES,

Defendant.

\_\_\_\_\_ /

DEPOSITION OF: DONNA COHEN.

DATE: June 30, 2016, 9:03 a.m.

PLACE: Escobar & Associates  
2917 West Kennedy Blvd, Suite 100  
Tampa, FL 33609.

REPORTED BY: Donna M. Kanabay RMR, CRR, FPR,  
Notary Public,  
State of Florida at large.

1 Q Not asking for specific --

2 A Not right now.

3 Q Just examples.

4 A There won't be a lot.

5 Q Any photographs that you're planning on using that  
6 wasn't provided by the defense?

7 A No, sir.

8 Q Did you take any photographs of Mr. Reeves or  
9 Vivian Reeves?

10 A No, sir. No.

11 Q Did you go to Cobb Theater and go inside the  
12 theater number 10?

13 A No, I haven't.

14 Q You mentioned that you have taught or  
15 instructed -- and I use the term loosely -- threat  
16 assessment to police officers.

17 What is it that you're -- give me kind of a  
18 snapshot of that course outline. What are the topics that  
19 you are instructing the police officers on as far as threat  
20 assessment?

21 A Pardon?

22 Q Regarding threat assessment.

23 A It's really talking about the -- I'm not going to  
24 give you a curriculum, but I'll give you the areas that  
25 would be covered.

1           The -- and really, relating to these are the kinds  
2 of risks and threats older people deal with from the  
3 environmental to the personal/physical.

4           We'll talk about ways to recognize populations at  
5 risk for threat. We'll go through case examples using  
6 homicide, homicide-suicide, elder, physical abuse situations  
7 and families. And we'll go through the cases I find very  
8 instructive because it shows the cops what's different about  
9 older people and the way they perceive the world, the things  
10 that make them feel vulnerable, from living in a high-crime  
11 area to natural disasters.

12           We'll actually have law enforcement role play  
13 situations and how they will respond to things.

14           I do have the curriculum for things I've used for  
15 threat assessment. But those are major areas that I would  
16 cover.

17           Q     Do you have curriculum currently, when you teach  
18 professionals, caregivers, threat assessment, like the  
19 threat assessment tool that we've been talking about -- when  
20 you teach that to other individuals, do you have written  
21 curriculum that you pass out or that you go by when you  
22 teach other individuals?

23           A     I do have those materials that I've used in the  
24 past, yes.

25           Q     And do you consider them proprietary in any way?

1           A     Some, yes, giving the personal identity  
2 information. But mostly not proprietary.

3           Q     Is it something that can be provided  
4 electronically?

5           A     Pardon?

6           Q     Is it something that can be provided  
7 electronically?

8           A     Probably. If not, I can scan it.

9           Q     And what would that be called? That would be  
10 curriculum for -- what? What would be the --

11          A     Threat assessment, violence assessment.

12               MR. MARTIN: Dino, I'm going to add that to my  
13 letter.

14               MR. MICHAELS: We have to look over the stuff.

15               MR. MARTIN: I'll just add it to the letter  
16 and --

17               MR. MICHAELS: That's fine.

18               MR. MARTIN: -- we'll go from there.

19               MR. MICHAELS: Very good.

20 BY MR. MARTIN:

21           Q     The curriculum that you have developed, has the  
22 curriculum been peer reviewed in any way?

23           A     It's not -- peer reviewed, I haven't written -- as  
24 I said at the beginning of the deposition, I have not  
25 written an article that would be in a peer reviewed journal.