

IN THE CIRCUIT COURT OF THE  
FOURTH JUDICIAL CIRCUIT, IN  
AND FOR DUVAL COUNTY,  
FLORIDA.

CASE NO.: 2017-CF-002246  
CR-C

STATE OF FLORIDA

VS.

RONNIE HYDE

**DEFENDANT'S FIRST MOTION TO COMPEL DISCOVERY AND POTENTIAL  
BRADY MATERIAL**

Defendant, by and through undersigned counsel, pursuant to Rule 3.220, Florida Rules of Criminal Procedure, Chapter 119, Florida Statutes, and *Brady v. Maryland*, moves this Court to enter an Order requiring the State to provide the following material if it is within the State's actual or constructive possession:

1. The contents of all State Attorney, 4<sup>th</sup> Judicial Circuit of Florida closed case files,(Duval, Clay or Nassau counties) including juvenile files, wherein Fred Laster or potential witnesses and siblings of Fred Laster: Richard Laster, Tracey Laster, Daisy Laster, Travis Laster or Dawn Laster (or those same persons under their married names), or potential witnesses Vincent Jubito or Christian Stallnecker, was the person charged with or investigated for a crime, including all police reports, discovery, statements of witnesses, statements of co-defendants, forensic reports, reports of experts including mental health reports concerning the potential witness, and all presentence, post sentence or juvenile predisposition reports.

2.. All Department of Children and Families records wherein Fred Laster, Travis Laster, Daisy Laster, Dawn Laster, Tracey Laster or Richard Laster (or those same persons under their married names) was either an alleged perpetrator or a potential victim or dependent child.

4. All school records of Fred Laster, Travis Laster, Richard Laster, Daisy Laster, Dawn Laster, or Tracey Laster, including test results, mental health reports, IQ testing.

5. The complete criminal histories of the victim Fred Laster and the following potential witnesses, including any criminal history from a jurisdiction other than Florida, and including copies of any available police reports: Christian Stallnecker, Vincent Jubito, Richard Laster (both the father and the brother), Travis Laster, Daisy Laster, Dawn Laster, or Tracey Laster.

6. Whether any witness has received anything of value as a result of his or her participation in this case including but not limited to money or property. Any documents relating to any such thing of value.

7. Whether any witness has received any promise or inducement in return for his or her testimony including any promise to receive any consideration by law enforcement or a prosecuting authority to refrain from filing charges, or to drop charges or to receive a lesser sentence or to receive a particular sentence.

8. Whether any witness has had pending charges in any jurisdiction since January 1, 2016. If so all documents relating to any such charges.

9. Whether any witness has been diagnosed with any mental illness or is under prescribed medication for a diagnosed mental illness that is of a chronic nature.

10. Whether any witness is taking/receiving prescribed medication for a chronic health problem, said medication being also a controlled substance under Chapter 893 Florida Statutes which can affect a person's mental ability such as methadone, valium, Xanax, oxycodone, etc. Whether any witness is taking/receiving a controlled substance as treatment for drug abuse.

11. All e-mails between anyone employed by the State Attorney's Office Fourth Judicial Circuit and any other person or agency pertaining to rewards of any kind or to forbearing from filing charges or plea bargains or sentencing discussions of any kind involving any of the listed witnesses or above mentioned potential witnesses.

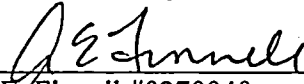
I HEREBY CERTIFY that a copy of the above and foregoing Motion has been furnished to the Office of the State Attorney, by e-mail, this 24<sup>th</sup> day of January 2018.

Respectfully submitted,

FINNELL, MCGUINNESS, NEZAMI &  
ANDUX, P.A.

2114 OAK. ST.

JACKSONVILLE, FL. 32204



---

Ann E. Finnell #0270040

afinnell@fmnlawyers.com

pleadings@fmnlawyers.com