

S.A. CASE NO.: 17CF012484AD

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

CLERK NO.: 162017CF002246AXXXMA

DIVISION: CRC

STATE OF FLORIDA

vs.

RONNIE LEON HYDE

**STATE'S FIRST SUPPLEMENTAL DISCOVERY EXHIBIT AND
DEMAND FOR RECIPROCAL DISCOVERY (PERTAINING TO NOTICE OF OTHER CRIMES, WRONGS,
OR ACTS, INCLUDING OTHER CRIMES, WRONGS, OR ACTS CHILD MOLESTATION OF [REDACTED])**

This response meets the requirements of Rule 3.220(b), Florida Rules of Criminal Procedure, and provides answers in the same order as required by the Rule. The State demands reciprocal discovery as required by Rule 3.220(d), Florida Rules of Criminal Procedure.

This Supplement pertains only to the State's First Notice of Other Crimes, Wrongs, or Acts served on January 16, 2018. Negative responses in this supplement do not supplement prior responses in previous discovery response, but only indicate that the category of evidence is does not exist for the other crimes, wrongs, or acts described in the State's first notice.

- A. All court reporters used in depositions and prior sworn statements in this cause, and all witnesses whose names are brought out in depositions.

CATEGORY A:

[REDACTED] (address and identity protected pursuant to agreed protective order)
Carlene L. Stalnecker-Jones, address to be provided
Lauren H. Stalnecker, address to be provided

Category C

Custodian of records, Clerk of the Circuit Court, in and for Duval County, Florida

- B. All statements brought out at depositions, if taken in this cause; any statements contained on the arrest docket and any police reports; any statements documented on FBI 302 reports of interviews.
- *C. All statements brought out at depositions, if taken in this cause; any statements by the accused reflected on the arrest docket and any police reports; statements by the accused documented on FBI 302 reports of interviews.
- D. No codefendants exist.
- E. None exist.
- *F. All items of evidence obtained from the Accused, which are listed in the Inventory and Receipt dated March 15, 2017, from the search of 846 4th Avenue North, Jacksonville Beach, Florida, specifically including all images of child pornography or child erotica depicting juvenile males.

G. None known to the State at this time.

H. None, other than potential statements by the accused on any recorded jail calls or recorded jail visitations.

*I. A search incident to arrest was conducted of the Defendant and his person. Searches pursuant to warrants were conducted of the Defendant's residence at 836 4th Avenue North, the Defendant's 2010 Toyota SUV, and the Defendant's body. Copies of the warrants, warrant affidavits, and inventories have either been produced or are available for inspection. All documents (or groupings of documents) seized are listed on those inventories.

*J. Pertaining to the other crimes, wrongs, and acts identified in the State's notice, the State anticipates using an FBI forensic analyst to describe the processes used to review all digital materials obtained from the defendant. The State also anticipates using an expert in child molestation and offender patterns and characteristics. Other experts pertaining to the charged offense have been provided.

*K. Photos, maps, charts, diagrams, rights form, court records, supporting documents, and all items of evidence listed in police reports and property submission/storage cards. All items listed on search warrant inventories from the searches identified in paragraph I, above. Court records from Case No. 16-1993-CJ-006358-AXXX-MA and 16-1993-cj-006947-AXXX-MA.

L. The State discloses any evidence suitable for DNA testing contained on evidence listings from the initial crime scene investigation and the inventories from the searches referenced in paragraph I, above.

*M. None known to the State at this time

3.220(b)(4) Disclosures.

Subsequent to providing information relative to the above-styled case, [REDACTED] was arrested for a criminal offense in the state of Tennessee. The undersigned made known to the Tennessee prosecuting authorities that [REDACTED] was cooperating with this homicide prosecution, that the State had made no promises, but that the State did think the information [REDACTED] provided prior to being arrested or charged there was credible, that [REDACTED] was indeed an expected witness here, and that [REDACTED] also would be viewed as a victim here, but for the applicable statute of limitations. The undersigned was advised by the prosecutor in Tennessee of the following: [REDACTED] case was resolved in a favorable way to [REDACTED]. One of the conditions of [REDACTED] deal, however, was that he fully cooperate with this office. The State will provide the identity of the prosecuting office and the prosecutor upon request.

* Defense may inspect, copy, test or photograph items contained in these paragraphs by appointment.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by email to Alan Chipperfield, Office of the Public Defender, 407 North Laura Street, Jacksonville, Florida 32202, this 16th day of January, 2018.

MELISSA W. NELSON
STATE ATTORNEY

A handwritten signature in black ink, appearing to be 'MWN', enclosed within a hand-drawn oval.

By: _____

Mac Devon Heavener, III
Assistant State Attorney
Bar Number 896748