

S.A. CASE NO.: 17CF012484AD

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

CLERK NO.: 162017CF002246AXXMA

DIVISION: CRC

STATE OF FLORIDA

vs.

RONNIE LEON HYDE

**STATE'S AMENDED¹ RESPONSE TO DEFENDANT'S
NOTICE OF LIMITED DISCOVERY**

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. This Amended Response replaces all prior discovery responses provided by the State. The State demands reciprocal discovery as required by Rule 3.220(d), Florida Rules of Criminal Procedure.

- A. All court reporters used or to be used in depositions and prior sworn statements in this cause, and all witnesses whose names are (or have been) brought out in depositions.

CATEGORY A:

Non Law-Enforcement Witnesses (relative to initial crime and scene):

Walter David Barry, Post Office Box 1832, Lake City, FL 32056

G.W. Risner, 858 N.E. Colvin Ave., Lake City, FL 32055

James G. Givens, 270 S.W. Upchurch Ave., Lake City, FL

Darlene Washburn, 506 N.W. Rebel Place, Lake City, FL 32055

William L. Gilbert, 123 SE Dustin Terr., Lake City, FL 32025

Ted Guerry, c/o Gateway-Forest Funeral Home, 3596 S Us Highway 441, Lake City, FL 32025

Harry Guerry, 4843 N.E. Gum Swamp Rd., Lake City, FL 32055

G.R. Dekle, Esq., 289 SW Loblolly Pl., Lake City, FL 32024-4245

¹This response duplicates much of the material set forth in the State's Response to Defendant's Contingent Notice of Limited Discovery (See Doc. No. 55) and is intended to now respond to Defendant's Motion for Additional Discovery (Doc. No. 103).

T.B. Coleman, Esq., 173 NE Hernando Ave. Ste. 239, Lake City, FL 32055-4000
Daisy Laster Price, address provided under terms of protective order
Richard Laster, address provided under terms of protective order
Tracey Jean Tyrell, address provided under terms of protective order
Dawn Williams, address provided under terms of protective order
Travis Laster, address provided under terms of protective order
Richard Roscoe Laster, address provided under terms of protective order
Arthur Picklo, Federal Correctional Institute, 3625 FCI Rd, Marianna, FL 32446

Non Law-enforcement Witnesses pertaining to State's First § 90.404 Notice:

█ (address and identity protected pursuant to agreed protective order)
Carlene L. Stalnecker-Jones, address to be provided
Lauren H. Stalnecker, 1057 Woodstock Ave., Jacksonville, FL 32254

Non Law-enforcement Witnesses pertaining to State's Second § 90.404 Notice:

█ (address and identity protected pursuant to agreed protective order)
Vincent Jubito, 96687 Chester Road, Yulee, FL 32097
Ken Cusak, 1040 Beckner Avenue, Jacksonville, FL 32218
Karen Cusak, 1040 Beckner Avenue, Jacksonville, FL 32218

Columbia County S.O. Witnesses:

The following witnesses are current or retired personnel of the Columbia County Sheriff's Office, 4917 US Highway 90, Lake City, FL 32055:

Kathy Shepard
Calvin Fenner, No. 3367
Chris Sharpe, No. D378
W.E. "Gene" Tomlinson, No. 912
Jack Hood, No. 911
Carl Hodson, No. D-105
Brian S. Rix, No. D-368
D. Rooks, No. 102
M. Hodges, No. 3316
Jack Hood, No. 911
J. Wells, No. 3097
Russ Williams
Robert Johnson, No. 472
R. Roberts
Det. Jimmy Watson
Det. Calvin Lee
Jason Massey

Stephanie Massey
Don Meyer
Ellen Herringshaw
Christopher Parker, ID 14PER000003

FBI Non-expert witnesses:

The following witnesses are current or retired personnel or task force officers of the Federal Bureau of Investigation, 6061 Gate Parkway, Jacksonville, FL 32256

Tim Adams
Joe Armstrong
Joe Barriere
Abbigail Beccaccio
Lynwood Bell
Jim Berry
Steve Burros
Genevieve Decker
Rodriguez Eduardo
Brett Eubank
Eddie Figueroa
Jon Fletcher
Erik Francesconi
H. Grover
Glenn Harbin
Kimberly Harkins
Glorieli Hernandez
Angela Hill
Jennifer Joiner
William Logan
Jonathan MacDonald
Armando Martinez
D. S. McCarley
Charles McKee, III
Angela Neu
Megan Perry
Lauren N. Regucci
Antony Roberson
Robert Robichaud
Penny Rose
Karen Ryndak
Rob Schwinger

Alexander M. Silverstein
Juliancarl Slaughter
Jon Soares
Vanessa Stelly
Christine Windness
David Robert Wozniak
Michelle Wyckoff

FDLE Non-expert witnesses:

The following witnesses are current or retired personnel of the Florida Department of Law Enforcement, 2331 Phillips Road, Tallahassee, Florida 32308:

Special Agent Bill Gootee
Special Agent Douglas Ugliano
James B. Gettemy
Special Agent April Glover

Jacksonville Beach P.D. Witnesses:

The following witnesses are current or retired personnel of the Jacksonville Beach Police Department, 101 South Penman Road, Jacksonville Beach, Florida 32250:

B. H. Conner, ID 91267
A. S. Dziedzicki, ID 791
A. E. Martin, ID 1206
D. E. Watts, ID 1259

Jacksonville S.O. witnesses:

The following witnesses are current or retired personnel of the Jacksonville Sheriff's Office, 501 East Bay Street, Jacksonville, FL 32202:

Jody Phillips
Det. G.L. Warkentien
Det. D. Meacham
Sgt. Dan Janson
R.J. Rein, ID 6150
E.T. Morgan, ID 5259
J. Long, ID 73813 (reserve cadaver officer)

Medical Examiner's Office Witnesses:

The following witnesses are current or retired personnel of the Medical Examiner's Office, Fourth Circuit, 2100 Jefferson Street, Jacksonville, FL 32206:

Dr. Margarita Arruza, Medical Examiner
Dr. Valerie Rao, Medical Examiner (expert in forensic pathology)

Jeff Brokaw, ME Investigator

EXPERT WITNESSES

FBI Expert Witnesses (located in Quantico, Virginia)

The following witnesses are located at the FBI Lab, 2501 Investigation Parkway, Quantico, VA 22135

Linda Otterstatter (trace evidence unit—hair and fiber analysis)
Adrienne Isom (child sexual predator behavioral analysis)
Brian C. McVicker (questioned documents and fracture match on bath appliques)
Antoine L. Frazier (questioned documents)
Andrea Mehlretter (chemistry—adhesive comparison)
Susan M. Marvin (chemistry—knife comparisons)
Angi M. Christensen (trace evidence—anthropology)

FDLE Expert Witnesses

The following witnesses are current or retired personnel of the Florida Department of Law Enforcement, 2331 Phillips Road, Tallahassee, Florida 32308:

Nadine Flanagan (DNA expert)
Douglas Barrow (latent prints expert)
Karen S. Barnes (serology expert)
Paula Anne Sauer (microanalysis expert)
Jo Ellen Brown (biology and DNA expert)
Marvin L. Stephens (latent prints expert)
Lynn Skoglund, FDLE Orlando Division Office (tool mark expert)

Other Expert Witnesses:

Casey DuPont, Senior Forensic Scientist, Orchid Cellmark, 13988 Diplomat Drive, Dallas, TX 75234 (DNA expert)
Huma Nasir, Team Leader, Orchid Cellmark, 13988 Diplomat Drive, Dallas, TX 75234 (DNA expert)
Rick W. Staub, Laboratory Director, Orchid Cellmark, 13988 Diplomat Drive, Dallas, TX 75234 (DNA expert)
Martin Doyle, ID 6029 Toronto Police Department, 40 College Street, Toronto, ON M5G 2J3 (expert in vacuum metal latent print analysis)
Heather Walsh-Haney, PHd, Florida Gulf Coast University, 10501 FGCU Blvd., Fort Meyers, FL 33965 (expert in anthropology and human identification)
Krystle Rodriguez, Forensic Analyst, University of North Texas Center for Human ID, 3500 Camp Bowie Blvd., Fort Worth, TX 76107 (DNA expert)

Melody Josserand, CODIS Administrator/Report Reviewer, University of North Texas Center for Human ID, 3500 Camp Bowie Blvd., Fort Worth, TX 76107
(DNA expert)

Dr. Andrew Laurence, U.S. Customs, address to be provided (pollen expert)

Lerah Sutton, Maples Center, University of Florida (clandestine grave expert)

CATEGORY C:

Jan Henderson, National Center for Missing and Exploited Children

Carol Schweitzer, National Center for Missing and Exploited Children

Mary Cortese, FDLE Tallahassee Regional Office

Deborah J. Carter or custodian of records, Duval County Public Schools

- B. All statements brought out at depositions, if taken in this cause; any statements contained on the arrest docket and any law enforcement reports (including FBI Form FD 302 reports of witness interviews); all statements on the video recording of the scene processing; all recorded statements of Daisy Price, Tracy Tyrell, and Lorrie Ann Woodward made during a recorded interview on September 14, 2015; all statements of Dawn Williams, Daisy Price, and Tracy Tyrell in recorded interview on February 17, 2016; all statements of Daisy Laster, Dawn Williams, Traey Tyrell, and Richard Laster during recorded interviews on April 29, 2016; all statements of Travis Laster during recorded interview on December 29, 2016; statements of Travis Laster during two attempted controlled phone calls on January 22, 2017; school records of victim identified as C.S.
- *C. All statements brought out at depositions, if taken in this cause; any statements by the accused on the arrest docket and any law enforcement reports (including FBI Form FD 302 reports of witness interviews); statements by the accused during his recorded interview by investigators Watson and Beccaccio on March 7, 2017.
- D. No codefendants exist.
- E. None exist.
- *F. All items of evidence obtained from the Accused, which are listed in any law enforcement reports and property storage cards. This specifically includes those items obtained from the accused at the time of his arrest as well as those items obtained from the residence of the accused in connection with the execution of the search warrant issued for that residence, the search of a residence owned by

the accused on Thelma Street pursuant to a written consent, the search of the accused's motor vehicle pursuant to a search warrant, and the search of the accused's body pursuant to a search warrant. Inventories of those searches have previously been disclosed.

G. None known to the State at this time.

H. None, other than a controlled telephone call with [REDACTED] and potential statements by the accused on any recorded jail calls or recorded jail visitations.

*I. The following searches took place: search warrants permitting the search of the body of Ronnie Leon Hyde issued on March 30, 2017, the search of a 2010 Toyota issued on March 9, 2017, and the search of the premises located at 836 4th Avenue North, Jacksonville Beach, Florida on March 6, 2010; A consent search also took place of the accused's property located at Thelma Street.

*J. All presently available reports have been provided by those expert witnesses identified above.

*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; photograph of Fred Paul Laster provided to JSO at time of missing person's report; all evidence collected at the original crime scene; items of garbage seized on April 12, 2016, to include zicam swabs; all evidence seized from searches of defendant's residence at Jacksonville Beach, defendant's property on Thelma Street, defendant's 2010 Toyota, and defendant's body (inventories previously provided); photos of locations searched and items seized; cds and boot camp letters provided by Travis Laster to the FBI; school records of victim whose initials are [REDACTED] financial records of defendant obtained by subpoena; childhood photos of victim provided by Richard Laster.

L. The State discloses any evidence suitable for DNA testing contained on the inventories previously disclosed.

*M. None known to the State at this time

3.220(b)(4) Disclosures.

All prior suspects identified in all law enforcement reports, including Richard

Rodgers, Gary Michael Hilton, Paul Lloyd Davis, Gary Ray Bowles.

Laster family members received burial assistance for their loved one, but this assistance was not in exchange for any anticipated testimony.

Witness Arthur Picklo is currently serving a federal sentence unrelated to the present case.

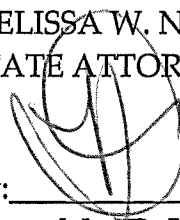
The victim identified in the State's First Notice of Other, Crimes, Wrongs, and Acts was arrested in Marshall County, TN for simple drug possession. The state has provided copies of the arrest paperwork as well as court disposition paperwork to counsel for the defendant. In an email dated November 28, 2017, the prosecuting attorney in that case advised the undersigned of the following: "We resolved the case today in what I would consider a favorable way to Mr. Stalnecker. One of the conditions of his deal, however, is that he fully cooperate with your office. Please advise if he does not do so, or if I may be of any further assistance."

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by hand and email to Gonzalo Andux, Esquire, and Ann Finnell, Esquire, Finnell, McGuinness, Nezami & Andux, 2114 Oak Street, Jacksonville, Florida 32204-4411, this 26th day of March, 2017.

MELISSA W. NELSON
STATE ATTORNEY

By: _____



Mac D. Heavener, III
Chief Assistant State Attorney
Fla. Bar Number 0896748