

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 RESPONSE TO DEFENDANT'S CONTINGENT
NOTICE OF LIMITED DISCOVERY**

In accordance with Rule 3.220, Florida Rules of Criminal Procedure, the State of Florida files this response to Defendant's contingent notice of limited discovery ("the contingent notice"). As a preliminary matter, Defendant, Ronnie L. Hyde, filed a motion for severance of counts on May 30, 2017. The State views all evidence pertaining to counts two through 13 of the information as admissible proof of other crimes, wrongs, or acts during the trial of count one of the information under the authority of § 90.404(2), Fla. Stat. and *Williams v. State*, 110 So.2d 654 (Fla.1959). The State nonetheless provides this discovery response without reports from January 1, 2016, and the full extent of available, discoverable evidence pertaining to all counts in accordance with the express terms of the Defendant's contingent notice. This response replies to the correspondingly numbered items in the contingent notice.

As to Count I only:

1. The names and addresses of all witnesses, including expert witnesses, who have information relevant to the charge contained in Count 1, or to any defense thereto:¹

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
T.B. Coleman, Esq., 173 NE Hernando Ave. Ste. 239, Lake City, FL 32055-4000
Daisy Laster Price, c/o State Attorney's Office, Fourth Circuit
Richard Laster, c/o State Attorney's Office, Fourth Circuit
Tracey Jean Tyrell, c/o State Attorney's Office, Fourth Circuit
Dawn Williams, c/o State Attorney's Office, Fourth Circuit
Travis Laster, c/o State Attorney's Office, Fourth Circuit
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)
Arthur Picklo, Federal Correctional Institute, 3625 FCI Rd, Marianna, FL 32446
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)

¹ All listed witnesses are being disclosed as Category A 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
Jimmy Watson
Stephanie Massey
Ellen Herringshaw

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

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

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

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
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)

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

Don Meyer
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

2. All reports of law enforcement written prior to January 1, 2016, which are relevant to the charge contained in Count 1, including any reports wherein the alleged victim was reported to be missing:

All materials responsive to this request are being provided on two separate computer discs labeled "Hyde: Book #1" and "Hyde Limited Discovery."

3. Copies of all search warrants issued in this cause dealing with Count 1, but not the affidavit or the return:

The requested warrants are attached, consisting of 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.

4. The reports of all experts who have information relevant to the charge contained in Count 1.

The requested reports are contained on the computer discs labeled "Hyde: Book #1" and "Hyde Limited Discovery" that are provided with this response.

5. All photographs taken relevant to this investigation prior to January 1, 2016 which are relevant to the charge contained in Count 1.

The requested photographs are contained on the computer discs labeled "Hyde: Book #1" and "Hyde Limited Discovery" that are provided with this response.

6. Whether any witness has received or expects to receive anything in exchange for his or her testimony including but not limited to money, special treatment, forbearance of charges, and reduction of charges.

No. Laster family members will receive burial assistance for their loved one, but this assistance is not in exchange for any anticipated testimony.

7. The names of any witnesses in this cause who have charges pending in this or any other jurisdiction, whether charges have been formally filed or not. *Davis v. Alaska*, 94 S. Ct. 1105 (1974); *Blanco v. State*, 353 So. 2d 602 (Fla. 3rd DCA 1977); *Keane v. State*, 357 So. 2d 457 (Fla. 4th DCA 1978).

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

8. Whether any of the state witnesses have recanted their testimony previously given. *Beasley v. State*, 315 So. 2d 540 (Fla. 2d DCA 1975).

None are presently known to the State.

9. Whether any of the State's witnesses have psychiatric histories which may affect their credibility or their ability to relate facts accurately.

None are presently known to the State.

10. Whether any state witness was under the influence of drugs or alcohol at the time he witnessed relevant events in the case. *United States v. Harris*, 542 F. 2d 1283 (7th Cir. 1976); *Morrell v. State*, 335 So. 2d 836 (Fla. 1st DCA 1976).

None are presently known to the State.

11. Whether any witness has identified someone other than the defendant as the perpetrator of the crime charged.

None are presently known to the State. Other suspects were identified for the charges set forth in count one of the information, but no witnesses identified someone else. Information regarding other potential suspects is contained within the two separate computer discs labeled "Hyde: Book #1" and "Hyde Limited Discovery."

12. Whether or not information was given by confidential informer in connection with the case and if yes, whether or not the confidential informer received money or any other benefit.

None is presently known to the State.

As to Counts 2-13:

1. The names and addresses of all witnesses, including expert witnesses, who may have information relevant to the charged offenses:

See witnesses listed above (primarily those listed as FBI employees).

2. Copies of all search warrants issued in this cause dealing with Counts 2-13 but not the affidavit or returns:

See warrants listed above.

3. The reports of all experts who have information relevant to the charges contained in counts 2-13.

Reports are presently unavailable due to the volume of digital evidence seized and under review. Reports will be provided once available.

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 1st day of June, 2017.

MELISSA W. NELSON
STATE ATTORNEY



By: _____

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



SEARCH WARRANT

IN THE NAME OF THE STATE OF FLORIDA

TO: ALL AND SINGULAR THE SHERIFF OR DEPUTY SHERIFFS OF DUVAL COUNTY, FLORIDA, ALL AND SINGULAR THE COMMISSIONER OR SPECIAL AGENTS OF THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT; AND ALL AND SINGULAR THE CHIEF INVESTIGATOR OR INVESTIGATORS OF THE STATE ATTORNEY'S OFFICE, FOURTH JUDICIAL CIRCUIT, FLORIDA

WHEREAS, complaint on oath and in writing, supported by affidavit, having been made this day before the undersigned Judge of the Fourth Judicial Circuit, in and for Duval County, Florida;

AND WHEREAS, said facts made known to me have caused me to certify and find that there is a probable cause to believe that there is now in or on said body of Ronnie Leon Hyde certain items of evidentiary value in a pending criminal investigation of the offenses of Murder, Kidnapping, Aggravated Child Abuse, Sexual Battery, Tampering with Evidence, and Possession of Child Pornography, in violation of sections 784.02, 787.01, 827.07, 794.011, 918.13, and 827.071, Florida Statutes.

Ronnie Leon Hyde located in the Duval County Jail in Duval County Florida, being more particularly described as follows:

Race/Gender: White Male
DOB: 06/02/1956
Height/Weight: 6'2"/Unknown
SS# [REDACTED]


The items to be seized to include:

1. Fingerprint and palm prints to be taken by recorded impressions for analysis and comparison;
2. Buccal swabs for DNA analysis and comparison, using sterile swabs to lift skins cells and saliva from the inside of the Ronnie Hyde's cheek;
3. Head, body, and pubic hairs (25 of each) of Ronnie Hyde, for forensic testing standards;

AND WHEREAS the facts establishing the grounds for this warrant are set forth in the affidavit of **Detective Sergeant Jimmy Watson, Columbia County Sheriffs Office (CCSO)**;

YOU ARE COMMANDED to seize and secure same, with reasonable and proper force or medical assistance as necessary, giving proper receipt therefore and delivering a completed copy of this Warrant to Ronnie Leon Hyde, and making a return of your doings under this Warrant within ten (10) days of the date hereof; and you are further commanded to bring said property so found and also any person arrested in connection therewith before the Court having jurisdiction of this offense to be disposed of according to law.

WITNESS my hand and seal this 30th day of March, 2017.



**Judge, Circuit Court of the
Fourth Judicial Circuit, in and for Duval
County, Florida**

S.A. NO. 17CF15710

SEARCH WARRANT

IN THE NAME OF THE STATE OF FLORIDA

TO: ALL AND SINGULAR THE SHERIFF OR DEPUTY SHERIFFS OF DUVAL COUNTY, FLORIDA, ALL AND SINGULAR THE CHIEF OF POLICE OR POLICE OFFICERS OF THE JACKSONVILLE BEACH POLICE DEPARTMENT, ALL AND SINGULAR THE COMMISSIONER OR SPECIAL AGENTS OF THE FLORIDA DEPARTMENT OF LAW ENFORCEMENT; AND ALL AND SINGULAR THE CHIEF INVESTIGATOR OR INVESTIGATORS OF THE STATE ATTORNEY'S OFFICE, FOURTH JUDICIAL CIRCUIT, FLORIDA

WHEREAS, complaint on oath and in writing, supported by affidavit, having been made this day before the undersigned Judge of the Fourth Judicial Circuit, in and for Duval County, Florida;

AND WHEREAS, said facts made known to me have caused me to certify and find that there is a probable cause to believe that the certain vehicle, currently located at 1460 Shetter Ave, Duval County, Florida, known and described as follows:

The vehicle to be searched is a 2010, Toyota, 5 door SUV, gray in color, Vehicle Identification Number JTKKU4B46AJ054816, Florida license number 125 XJR, currently sealed and in secure storage at the City of Jacksonville Beach Police Department Property Department, in the custody on behalf of the City of Jacksonville Beach, Duval County, Florida

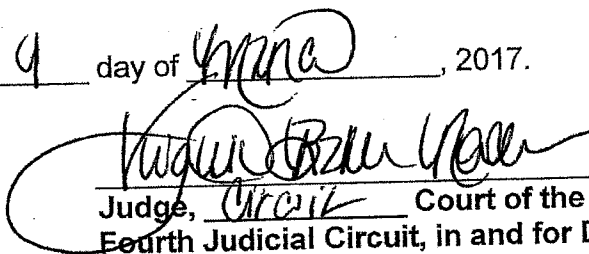
is being or has been used by Ronnie Leon Hyde for the purpose of maintaining or concealing fruits, evidence, or instrumentalities of the offenses of Murder, Kidnapping, Aggravated Child Abuse, Sexual Battery, Tampering with Evidence, and Possession of Child Pornography, in violation of sections 784.02, 787.01, 827.07, 794.011, 918.13, and 827.071, Florida Statutes,

And if the same or any part thereof be found, you are hereby commanded to seize and secure same, giving proper receipt therefore and delivering a completed copy of this Warrant to the person in charge of the vehicle, or in the absence of any such person, leaving a complete copy where the property is found, and making a return of your doings under this Warrant within ten (10) days of the date hereof; and you are further commanded to bring said property so found and also any person arrested in connection therewith before the Court having jurisdiction of this offense to be disposed of according to law.

AND WHEREAS the facts establishing the grounds for this application are set forth in the affidavit of **Detective Sergeant Jimmy Watson, Columbia County Sheriffs Office (CCSO)**;

NOW THEREFORE, you or either of you, with such lawful assistance as may be necessary, are hereby commanded, in the daytime or in the nighttime, or on Sunday, as the exigencies of the occasion may require, to enter and search the aforesaid vehicle, for the property described in this warrant, to-wit: you are hereby commanded to seize and secure same, giving proper receipt therefore and delivering a completed copy of this Warrant to the person in charge of the premises, or in the absence of any such person, leaving a complete copy where the property is found, and making a return of your doings under this Warrant within ten (10) days of the date hereof; and you are further commanded to bring said property so found and also any person arrested in connection therewith before the Court having jurisdiction of this offense to be disposed of according to law.

WITNESS my hand and seal this 9 day of March, 2017.



Judge, Craig Court of the
Fourth Judicial Circuit, in and for Duval
County, Florida

SEARCH WARRANT

IN THE NAME OF THE STATE OF FLORIDA
TO: ALL AND SINGULAR THE SHERIFF OR DEPUTY SHERIFFS OF DUVAL COUNTY,
FLORIDA; ALL AND SINGULAR THE CHIEF OF POLICE OR POLICE OFFICERS OF THE
JACKSONVILLE BEACH POLICE DEPARTMENT; ALL AND SINGULAR THE
COMMISSIONER OR SPECIAL AGENTS OF THE FLORIDA DEPARTMENT OF LAW
ENFORCEMENT; AND ALL AND SINGULAR THE CHIEF INVESTIGATOR OR
INVESTIGATORS OF THE STATE ATTORNEY'S OFFICE, FOURTH JUDICIAL CIRCUIT,
FLORIDA.

WHEREAS, complaint on oath and in writing, supported by affidavit, having been made
this day before the undersigned Judge of the Fourth Judicial Circuit, in and for Duval County,
Florida;

AND WHEREAS, said facts made known to me have caused me to certify and find that
there is probable cause to believe that those certain premises and the curtilage thereof, in
Duval County, Florida, known and described as follows:

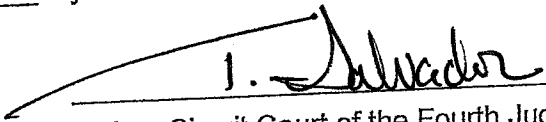
The residence is located at 836 4th Avenue North Jacksonville Beach Florida.
The residence is on a corner lot and is at the southeast lot at the intersection of
4th Avenue North and N. 9th Street. The residence has a single paved driveway
that goes directly from 4th avenue and south to an attached but not fully
enclosed carport. The residence is a single story home that is painted a light gray
color. There are numerous large bushes along the 4th avenue side of the lot that
form a hedge over 10' high. There are several bushes along the west side of the
lot but they do not form an uninterrupted hedge. The majority of the lot is not
fenced, but there is a chain link fence enclosing an area on the extreme south of
the lot behind the residence. See Attachment A for photos of the residence.

are being used by Ronnie L. Hyde, for the purpose of containment of evidence regarding the
commission of felonies, to-wit: murder in violation of § 784.02, Florida Statutes, kidnapping in
violation of § 787.01, Florida Statutes, Aggravated Child Abuse in violation of § 827.07, Florida
Statutes, Sexual Battery in violation of § 794.011, Florida Statutes, Tampering with Evidence in
violation of § 918.13, Florida Statutes, Possession of Child Pornography in violation of §
827.071, Florida Statutes, and Abuse of a Dead Human Body in violation of § 872.06, Florida
Statutes, said evidence being fully described on Attachment B, which is incorporated herein and
made part of this warrant by express reference.

AND WHEREAS the facts establishing the grounds for this application are set forth in
the affidavit of Detective Sgt. Jimmy Watson of the Columbia County Sheriff's Office;

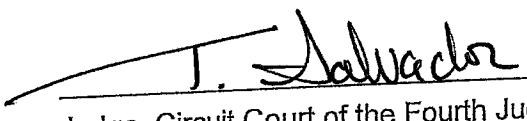
NOW THEREFORE, you or any of you, with such lawful assistance as may be necessary, to specifically include requested assistance by agents, technicians, and personnel of the Federal Bureau of Investigation, are hereby commanded, in the daytime or in the nighttime, or on Sunday, as the exigencies of the occasion may require, to enter and search the aforesaid premises, whether occupied or not, together with the yard and curtilage thereof and any vehicles parked thereon, and any person on said premises reasonably believed to be engaged in or connected with said illegal activity, for the property described on Attachment B, which is incorporated herein and made part of this warrant by express reference; you are hereby commanded to seize and secure the same, giving proper receipt therefore and delivering a completed copy of this Warrant within ten (10) days of the date hereof; and you are further commanded to bring said property so found and also any person arrested in connection therewith before the Court having jurisdiction of this offense to be disposed of according to law.

WITNESS my hand and seal this 6th day of March, 2017.



Judge, Circuit Court of the Fourth Judicial
Circuit, in and for Duval County, Florida

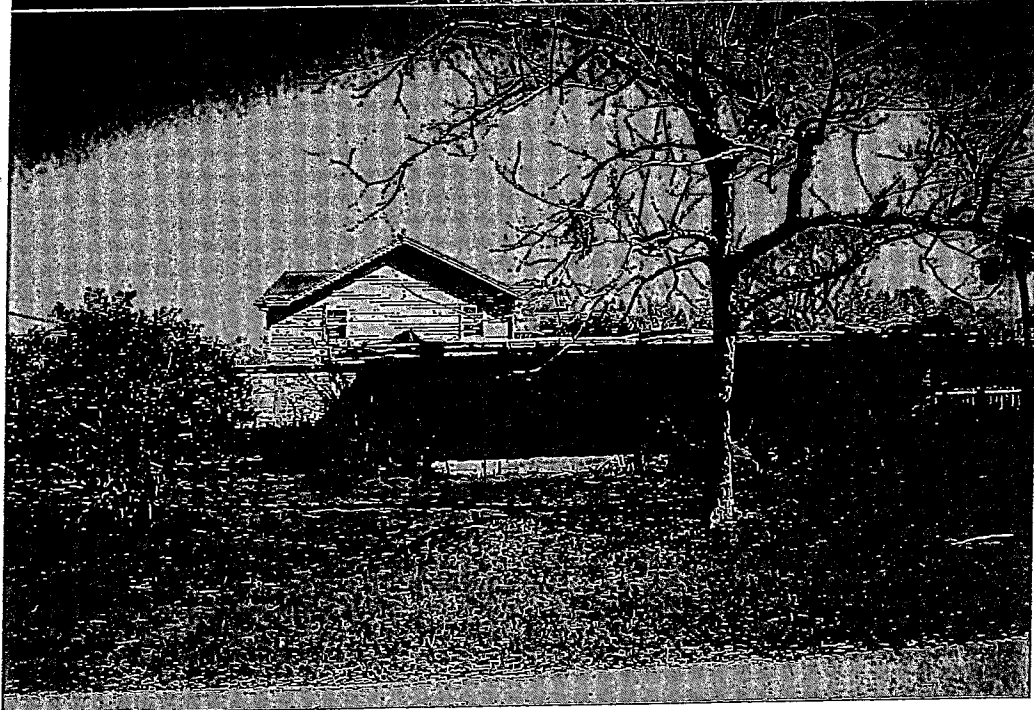
THE FOREGOING APPLICATION for a Search Warrant coming on to be heard, and having examined the applicant under oath and other matters and facts alleged therein, and being satisfied there is probable cause to believe the grounds set forth in said application and the facts alleged therein do exist and that the Laws of the State of Florida are being violated as alleged, I do so find and a Search Warrant is hereby allowed and issued.



Judge, Circuit Court of the Fourth Judicial
Circuit, in and for Duval County, Florida.

ATTACHMENT A

PREMISES TO BE SEARCHED



ATTACHMENT B

1. Blood, tissue, bones, semen, fingerprints, and trace evidence (to include hair, fiber, and evidence containing human DNA) related to the death or presence of Fred Paul Laster at the premises, to include items that may be located only through advanced investigative methods or techniques or through proper and necessary structural intrusion and excavation using such electronic and mechanical means as necessary.
2. Knives or other cutting tools used for dismemberment of a human body and for comparison with evidence found at site of the body disposal described below.
3. Plastic bags, including garbage bags and shopping bags, used for long-term storage of good or other items.
4. Human remains, skeletal remains, or human flesh or other tissue of Fred Paul Laster.
5. Foam bedding or other similar designed mattress type foam commonly named as "egg crate" style bedding or mattress toppers.
6. Bath tub non-skid mats, treads, or appliques, including fractured or incomplete pieces of those items.
7. Writings, recordings, or other records related to knowledge, research, or other information in relation to this case.
8. Digital evidence to include any and all computers, smart phones, electronic storage disks, VHS cassettes, CD's, DVD's, as well any records of passwords, logs, or other items for purposes of:
 - A. Communications, research, locations, and other items related to this investigation.
 - B. Long term storage of images, videos, or other depictions of child sexual exploitation.
 - C. Information showing travel arrangements, email addresses, internet activity, and other items that would be of benefit in discovering victims of sexual exploitation as well as potential clandestine grave sites, visited locations, or historical travel records.
9. Gloves, such as kitchen gloves, work gloves, or other items for comparison of evidence obtained from the body-disposal site of Fred Paul Laster as well as analysis for trace evidence related to the death and dismemberment of Fred Paul Laster.

10. 1987 Chevy Camaro, be it found on the property, or paperwork, recordings of sale or transfer, and/or records that may establish the current possession, ownership, location, maintenance, or long-term storage of the vehicle.
11. Clandestine graves located on the property, to be found through use of trained personnel in clandestine grave detection, ground intrusive search techniques and recovery methods, use of canines trained in human remains detection, use of ground penetrating radar, or other peer accepted methods of detection and recovery, for the purpose of locating and recovering buried human remains or other evidence on the property or curtilage thereof.
12. Records of clients or patients of R. Hyde, written or digital, while performing counseling, church leadership, or other associated jobs or tasks, in order to compare such records against missing persons records as well as against images or records of victims of child abuse or sexual exploitation.
13. Structural or furniture items, such as bathtubs, large vats, flooring, beds or bedding, and other items that due to the need for advanced forensic analysis may require removal in whole or part from the property to be transported securely for off-site analysis.
14. Personal property that may be reasonably identified as belonging to Fred Paul Laster and/or other victims of murder, exploitation, or abuse.
15. Any and all images and or videos, recorded by film, negative, undeveloped film rolls, video tape, digital recording, or other means of image capture as these items need to be analyzed for photos of the victim and suspect to determine locations, times, and dates for their interaction with each other.
16. Clothing and bedding in whole or part to include items of similar age and style to plaid red cotton shirt found at crime scene, as well as other clothing items that may be linked through fiber analysis to fibers recovered at crime scene.
17. Computer hardware to include any and all computer equipment used to collect, analyze, create, display, convert, store, conceal, or transmit electronic, magnetic, optical, or similar computer impulses or data. Hardware includes (but is not limited to) any data-processing devices (such as central processing units, cellular devices, personal computers to include "laptop" or "notebook" or "pocket" computers); internal and peripheral storage devices (such as fixed disks, external hard disks, floppy disk

drives and diskettes, tape drives and tapes, optical storage devices, and other electronic media devices)

18. Computer input and output devices to include but not limited to keyboards, mice, scanners, printers, monitors, network communication devices, modems and external or connected devices used for accessing computer storage media.
19. Computer storage media and the digital content to include but not limited to floppy disks, hard drives, VHS tapes, tapes, DVD disks, CD-ROM disks or other magnetic, optical or mechanical storage which can be accessed by computers to store or retrieve data or images of child pornography.
20. Computer software and application software installation and operation media.
21. Computer software, hardware or digital contents related to the sharing of Internet access over wired or wireless networks allowing multiple persons to appear on the Internet from the same IP address.
22. Manuals and other documents (whether digital or written) which describe operation of items or software seized.
23. Items containing or displaying passwords, access codes, usernames or other identifiers necessary to examine or operate items, software or information seized.
24. Correspondence or other documents (whether digital or written) pertaining to the possession, receipt, origin or distribution of images involving the sexual exploitation of children.
25. Correspondence or other documents (whether digital or written) exhibiting an interest in the sexual exploitation of children.
26. Items that would tend to establish ownership or use of computers and ownership or use of any Internet service accounts accessed to obtain child pornography to include credit card bills, telephone bills, correspondence and other identification documents.
27. Items that would tend to show dominion and control of the property searched, to include utility bills, telephone bills, correspondence, rental agreements and other identification documents.

28. Data maintained on the computer, or computer related storage devices such as floppy diskettes, tape backups, computer printouts, and "zip" drive diskettes, in particular, data in the form of images and/or videos and any accompanying text associated with those images, and/or log files recording the transmission, of images as they relate to violations of Florida law cited herein related to possession and production of child pornography.
29. Files and data on the computer that show the suspect's ownership, possession and control at time of the offense.
30. Any and all software that may be utilized to create, receive, distribute, store, or modify the evidence sought and all software that may be used to communicate or store online communications.
31. Encrypted, deleted and unallocated files on electronic media that contain any of the information listed in previous paragraphs.
32. Notations, files or documentation containing passwords or codes necessary to unlock computer files or to access the computer or storage media.
33. Any cameras, film, or other medium of documenting images of sexual performance by a child.