IN THE CIRCUIT COURT IN THE
17TH JUDICIAL CIRCUIT, IN AND
FOR BROWARD COUNTY, FLORIDA

CASE NO.: 26011790CF10A

STATE OF FLORIDA,
Plaintiff,

JUDGE: VIAMONTES

vs.

JAZMINE RHODES,
Defendant.

**NOTICE OF APPEARANCE;
WRITTEN PLEA OF NOT GUILTY;
DEMAND FOR TRIAL BY JURY;
MOTION FOR STATEMENT
OF PARTICULARS**

_____/

COMES NOW the Defendant by and through the undersigned attorney and informs the Court and the prosecution that the undersigned will be representing the Defendant.

FURTHER COMES the Defendant and enters this written plea of NOT GUILTY, and demands a TRIAL BY JURY.

COMES NOW the Defendant by and through the undersigned attorney pursuant to Fla.R.Crim.P. 3.220 (a) and respectfully requests:

The prosecutor disclose and permit counsel to inspect, copy, test and photograph within 15 days, the information and material within the State's possession or control as specified in Fla.R.Crim.P. 3.220.

DISCOVERY OF "SENSITIVE WITNESSES"

Whether any person listed above as a witness by the prosecutor is a child under sixteen (16) years of age or is otherwise considered by the prosecutor to be of "fragile emotional strength" as specified in 3.220 (h) (4) of the Florida Rules of Criminal Procedure.

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STATEMENT OF DEFENDANT

Any statements made by Defendant whether taped, written or oral.

SEARCH AND SEIZURE

a. Names and addresses of persons conducting search and seizure.

b. Any documents relating to said search and seizure, including, but not limited to, search warrants and supporting affidavits.

c. Whether seizure was made pursuant to search warrant, as incident to lawful custodial arrest, under plain view doctrine, under theory of abandoned property, under theory of inventory search or based on the Defendant's consent.

d. If consent is alleged to be given by someone other than the Defendant, the name and address of said person and consenting person's relationship to the Defendant.

CONFIDENTIAL INFORMANTS

a. Names and addresses of all confidential informants involved in the instant case.

b. How said confidential informant has been involved in the instant case, and how said confidential informant has worked with the police against the Defendant.

c. Whether said confidential informant has a past criminal record (including all arrests) and/or is or was a user of narcotic or hallucinogenic drugs.

d. The number of cases in which said confidential informant has participated in the past.

e. The number of convictions and/or acquittals resulting in those cases.

f. Whether the confidential informant has received financial remuneration for his services. If so, how much?

g. Whether the confidential informant has received or promised assistance with any

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criminal charges against himself and/or a member of his family, or a friend or associate.

ELECTRONIC SURVEILLANCE

Pursuant to Rule 3.220 and Florida Statute 934, the Defendant would demand the following documents: Authorization, Application, Order of Interception, Application for Extension, Order of Extension of Interception, Affidavit of Compliance, Order of Custody, Notification and Inventory, Logs and any other documents.

PRESERVATION OF TAPE RECORDINGS

In reference to any audio tape recordings, video tape recordings or other similarly recorded statements of defendant, witnesses or any transactions in this cause, the defendant demands the State requests and preserve any and all such tapes and retain for copy and/or inspection as provided pursuant to Discovery Rule.

LINE-UPS, SHOW-UPS, PHOTOGRAPHIC DISPLAYS

In reference to any line-ups, show-ups and/or photographic displays the Defendant would demand that any photographs or documentary data relevant thereto be preserved.

a. If applicable, when, where, under what circumstances and by whom such identification procedures were conducted.

b. Names and addresses of all individuals who were present at the aforementioned identification procedures and the exact manner and extent to which each individual so named participated therein.

c. As to each witness who viewed such identification procedures, whether said individual was able to identify the Defendant as the perpetrator of the alleged

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crime.

POLYGRAPH EXAMINATIONS

Whether anyone has been administered a polygraph examination; the name of the examiner; his opinion; and the test questions, charts, and other pertinent documents.

BRADY EVIDENCE

Any and all evidence favorable to the accused on the issues of guilt, or punishment. Brady v. Maryland, 373 U.S. 83 (1963); United States v. Agurs, 427 U.S. 97 (1976); Giles v. Maryland, 386 U.S. 66 (1967).

EVIDENCE OF IMPEACHMENT
MOTIVE OR BIAS

a. Whether there has been any promise of leniency and/or promise of financial remuneration to any witness(es). Giglio v. United States, 405 U.S. 150 (1972); DeMarco v. United States, 415 U.S. 449 (1974).

b. Whether the State of Florida or any political sub-division thereof, or municipality thereof, or the United States Government or any subdivision thereof, or agency thereof, has contributed moneys for the payment of legal services for any co-defendant(s), or witness(es) in said cause.

c. Any and all evidence whether it be testimonial or documentary in nature which would contradict, or be inconsistent with, proof the State intends to introduce at trial.

STATEMENT OF PARTICULARS

a. Exact day and time within two (2) hours either way of the alleged crime.

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b. Exact location.

c. The manner in which the crime was alleged to have been committed.

IMPLIED CONSENT DISCOVERY

All police reports, statements, affidavits, videos, supplements and other documents as "limited discovery" under the Uniform Traffic Rules of the Supreme Court of Florida requiring delivery of same no later than two (2) business days prior to any administrative hearing on the issue of implied consent as set forth in F.S. 322.2615 et. seq., pursuant to Rule 6.185 (b) Traffic Court Rules.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been efiled and a copy has been provided to the Office of the State Attorney, Florida; this 6th day of November, 2026.

The Law Offices of Joshua D. Rydell
Attorney for Defendant
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By: /s/ Joshua Rydell
Joshua D. Rydell
Florida Bar No: 28372

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