

IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT  
IN AND FOR ALACHUA COUNTY, FLORIDA

STATE OF FLORIDA  
Plaintiff,

Case Number: 01-2023-CF-002250-A

Division IV

vs.

Christian David Vargas  
Defendant.

**STATE'S DISCOVERY EXHIBIT**

The State of Florida discloses the following pursuant to the Defendant's Notice of Discovery under Florida Rules of Criminal Procedure 3.220(b)(1):

3.220(b)(1)(A)	Names and addresses – See attached Witness List	Yes
3.220(b)(1)(B)	Witness statements	Yes
3.220(b)(1)(C)	Defendant Statements	Yes
3.220(b)(1)(D)	Co-Defendant Statements	Yes
3.220(b)(1)(F)	Papers or objects obtained from defendant	Yes
3.220(b)(1)(H)	Electronic surveillance of premises or conversations	Yes
3.220(b)(1)(I)	Search and seizure	Yes
3.220(b)(1)(J)	Reports or Statements of Experts	Yes
3.220(b)(1)(K)	Papers or objects not obtained from defendant	Yes

Any items not listed are not known to the State at this time. Any further disclosure of any item required to be disclosed pursuant to 3.220(b)(1)(A-M) shall be furnished as supplemental discovery.

All tangible objects as provided by Florida Rules of Criminal Procedure 3.220(b)(1)(F) and 3.220(b)(1)(L), unless "NONE" indicated below, may be inspected, photographed and tested during the regular and ordinary business hours after 48 hours written notice at: GPD

**Notice to Investigating Agency(ies):** This document will service as authorization for the Attorney for Defendant, or his designated representative to conduct the said discovery of tangible objects, in the above-styled cause. Discovery may include testing, copying and inspection. All investigating agencies associated to this case are hereby notified that the State of Florida has released all information required by Florida Rule of Criminal Procedure 3.220 to the Defendant, or the Defendant's Attorney. The State of Florida's answer to discovery significantly limits the Public Records exemption found in Florida Statute 119.071(2). All video and audio recordings, including in-car video, 911 calls, recorded witness statements, law enforcement radio recordings, cell phone audio and video, recorded telephone calls, that are in the possession of any law enforcement agency are subject to inspection and copying by the Defendant or the Defendant's attorney. Such inspection

should be done at the location where such evidence is maintained, and pursuant to the public records inspection policy of the agency. Notice to the Office of the State Attorney by the Defendant, or the Defendant's attorney shall not be required prior to inspection or copying. The agency shall not prevent the inspection of such public records by the Defendant, or the Defendant's Attorney, by requiring any form of pre-approval by the Office of the State Attorney.

**Notice Regarding Electronic Media:** You are hereby notified there is the possibility that other relevant electronic media may exist in this case. This may include but is not limited to: in-car audio/video of law enforcement officers listed in this response, jail calls and private surveillance video. The Office of the State Attorney does not obtain or maintain copies of electronic media not intended to be used at trial or not known to contain exculpatory information. If the Office of the State Attorney is not in possession of particular electronic media, it may be available for inspection at the law enforcement agency or at the premises of the private entity in possession of such media in accordance with the procedures set up by those respective parties. Media in possession of the Office of the State Attorney can be viewed, copied, and inspected in accordance with the procedures outlined at <http://www.sao8.org/ccopy.html>

**Notice Regarding Audio Recorded Telephone Calls of Inmates:** All persons incarcerated within the 8<sup>th</sup> Judicial Circuit may be permitted to utilize telephones that are within the correctional facility. All inmate telephone calls and visitation calls are recorded. All defendants, and defendant's counsel, should be aware that the statement of a defendant, and the statement of any incarcerated witness, informant witness or co-defendant, may be contained within the electronic storage system of the contracted telephone service provider for the correctional facility where any such defendant, witness, informant witness or co-defendant is detained. All defendants, and defendant's counsel, are on notice that the State Attorney does not monitor all recordings made in correctional facilities. The Office of the State Attorney for the 8<sup>th</sup> Judicial Circuit does not provide copies of recorded inmate conversations, unless such copy is in the actual physical possession of the Office of the State Attorney, and contains exculpatory information or is intended to be used at trial. In such event, the defendant may obtain copies of such media as outlined above. Defendants who wish to obtain a copy of any inmate's telephone communications should contact the service provider for the facility where such individual is detained. Those service providers are:

Alachua: Securus Communications <https://www.securustech.net/>  
Baker: Securus Communications <https://www.securustech.net/>  
Bradford: Pay Tel <http://www.paytel.com/>  
Gilchrist: Am Tel [https://www.myphoneaccount.com/Service/Facility/Facility\\_sm.php](https://www.myphoneaccount.com/Service/Facility/Facility_sm.php)  
Levy: Smart Communications <https://www.smartcommunications.us/>  
Union: Global Tel Link ([www.gtl.net](http://www.gtl.net))

**PLEASE BE ADVISED THAT CONFIDENTIAL RECORDS OR INFORMATION REQUIRING A COURT ORDER TO RELEASE EXIST IN THIS CASE:**

- 1) CPT Reports, Photos or Videos

I HEREBY CERTIFY that a copy hereof has been furnished to the office of Gilbert A. Schaffnit Esquire, 719 NE FIRST STREET, GAINESVILLE, FL, 32601 by email this 13th day of April, 2024.

Brian S. Kramer  
State Attorney

**s/ Lua J. M. Lepianka**

Lua J. M. Lepianka  
Assistant State Attorney  
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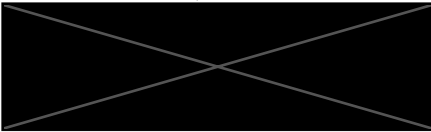
**WITNESS LIST**

Category A witnesses:

  
  
New Rochelle, NY 

  
  
Gainesville, FL 

Mr. Noel Curz, co-defendant



SGT John M. Pandak #695  
OFC. Lindsay L. Allen #853  
OFC. Ranisha L. Johnson #1146  
DET Desiree Russano #990  
Gainesville Police Department  
PO BOX 1250  
GAINESVILLE, FL 32627

  
Alachua, FL 

  
Gainesville, Fl 

Category B witnesses:

Category C witnesses:

Similar fact evidence/FS 90.404(2):

\* Witnesses present during defendant/co-defendant statements

The State will amend and supplement with additional responses as necessary.