

S.A. CASE NO.: 19CF066702AD

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

CLERK NO.: 162019CF011711A

DIVISION: CRG

STATE OF FLORIDA

vs.

BRIANNA SHONTAE WILLIAMS

**STATE'S DISCOVERY EXHIBIT AND
DEMAND FOR RECIPROCAL 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. The State demands reciprocal discovery as required by Rule 3.220(d), Florida Rules of Criminal Procedure. All reports, documents and discs have been copied and supplied to the defense attorney upon service of this Discovery Exhibit.

- A. All court reporters used in depositions and prior sworn statements in this cause, and all witnesses whose names are brought out in depositions.
List to be provided in a Supplemental Discovery Exhibit.
- B. All statements brought out at depositions, if taken in this cause. Any statements contained on the arrest docket and all police reports.
- C. All statements brought out at depositions, if taken in this cause. Any statements by the accused on the arrest docket, all police reports, and records.

DEFENDANT'S STATEMENTS	NUMBER
CCR #: 19-0762278	
911 Call made by Brianna Shontae Williams	1 file
Recorded Interview: Brianna Shontae Williams dated 11/6/2019	1 video
Recorded Interview: Brianna Shontae Williams dated 11/21/2019	1 video
Recording of Brianna Shontae Williams in vehicle on base dated 11/12/2019 (Titled READOUT)	5 videos

- D. All statements brought out at depositions, if taken in this cause. Any statements by the accused on the arrest docket, all police reports, and records.
- E. None known to the State of Florida at this time.
- F. All items of evidence obtained from the Accused, which are listed in police reports and property submission/storage cards.
- G. None known to the State of Florida at this time.
- H. None known to the State of Florida at this time.
- I.

CONSENT TO SEARCH FORMS	
CCR#: 19-0762278	
RESIDENTIAL AND VEHICLE	NUMBER
661 Ivy Street, Jacksonville, Florida 32206 signed by Brianna Williams on November 6, 2019	1 page
[REDACTED] Jacksonville, Florida 32206 signed by Brianna Williams on November 6, 2019	1 page
ELECTRONIC DEVICES	NUMBER
Samsung Note 10 Plus, iPhone 6s Plus signed by Brianna Williams on November 6, 2019	1 page
Apple iPhone signed by Dorielle Sims on November 10, 2019	1 page
Consent to Search Electronic Devices at Vowell Grocery Store dated November 13, 2019	1 page
Samsung signed by Dalton Roberts on November 10, 2019	1 page
iPhone 6 Plus signed by Wayne Boykin dated November 11, 2019 (Alabama Law Enforcement Agency State Bureau of Investigations)	1 page
iPhone 6 Plus signed by Wayne Boykin dated November 11, 2019 (Jacksonville Sheriff's Office)	1 page
SEARCH WARRANTS	
CCR#: 19-0762278	
APPLICATIONS AND WEBSITES	NUMBER
Search Warrant and Affidavit and Application for Order Precluding Subscriber Notification for Uber records associated with (205)936-2933	13 pages
Search Warrant and Affidavit for Lyft records associated with (205)936-2933	10 pages
Search Warrant and Affidavit for Match.com profile of Brianna Shontae Williams	9 pages
Search Warrant and Affidavit for Apple iCloud related to Brianna Williams and known associated phone number and email addresses	9 pages
Search Warrant and Affidavit for Google information related to Brianna Williams and known associated phone number and email addresses	23 pages
DNA	NUMBER
Search Warrant, Affidavit, and Return for DNA of Brianna Shontae Williams	5 pages
ELECTRONIC DEVICES	NUMBER
Search Warrant and Affidavit for black Samsung Cell Phone with IMEI:	15 pages

352069107825738 (search is incomplete; return to follow)	
Search Warrant, Affidavit, and Return for black Samsung Cell Phone with IMEI: 356628100387099	15 pages
Search Warrant and Affidavit for Toshiba Device with Serial Number 6B466972W (search is incomplete; return to follow)	8 pages
Search Warrant and Affidavit for Sony Vaio Device with Serial Number 545282030000188 (search is incomplete; return to follow)	9 pages
Search Warrant and Affidavit for HP Pavilion Device with Serial Number 8CG8452TX1 (search is incomplete; return to follow)	8 pages
Search Warrant, Affidavit, and Return for Arris (Model SVG2482AC) with Serial Number 81C3W36DCC01940	10 pages
LOCATION DATA	NUMBER
Search Warrant and Affidavit for Verizon records relating to (205)936-2933 from April 29, 2019 to November 6, 2019	10 pages
Search Warrant and Affidavit for AT&T records relating to (205)531-2761 from May 1, 2019 to November 6, 2019	10 pages
Search Warrant and Affidavit for T-Mobile records relating to (205)239-6709 from May 1, 2019 to November 6, 2019	10 pages
Trap and Trace Device Warrant and Affidavit for (904) 426-6267	22 pages
Search Warrant, Affidavit, and Return for black Honda Accord bearing Florida tag QNBRI with VIN # 1HGCR3F89HA020370 dated November 6, 2019 (specifying GPS has evidence sought)	6 pages
RESIDENTIAL AND VEHICLE	NUMBER
Search Warrant, Affidavit, and Return for 8745 Palm Breeze Road Apartment #205, Jacksonville, Florida	6 pages
Search Warrant, Affidavit, and Return for 661 Ivy Street, Jacksonville, Florida	6 pages
Search Warrant, Affidavit, and Return for black Honda Accord bearing Florida tag QNBRI with VIN # 1HGCR3F89HA020370 dated November 6, 2019	5 pages
Search Warrant, Affidavit, and Return for black Honda Accord bearing Florida tag QNBRI with VIN # 1HGCR3F89HA020370 dated November 6, 2019	5 pages
Search Warrant, Affidavit, and Return for 409 Williams Street, Linden, Alabama	7 pages
Search Warrant, Affidavit, and Return for 410 Williams Street, Linden, Alabama	6 pages
Search Warrant, Affidavit, and Return for wooded area located on west side of County Road 44 approximately ¼ mile north of State Highway 28 in Marengo County, Alabama	11 pages
Search Warrant, Affidavit, and Return for wooded area located at 32.343483, -87.840627 in Marengo County, Alabama	6 pages

J. None known to the State of Florida at this time.

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. See the

following for specific information.

POLICE REPORTS	NUMBER
CCR#: 19-0762278	
JACKSONVILLE SHERIFF'S OFFICE	
Arrest and Booking Report: Brianna Williams	3 pages
Arrest Warrant and Affidavit: Brianna Williams	5 pages
General Offense Report	4 pages
Supplement Incident Report 1	5 pages
Supplement Incident Report 2	3 pages
Supplement Incident Report 3	3 pages
Supplement Incident Report 4	3 pages
Supplement Incident Report 5	4 pages
Supplement Incident Report 6	252 pages
Supplement Incident Report 7	4 pages
Supplement Incident Report 8	5 pages
Supplement Incident Report 9	4 pages
Supplement Incident Report 10	5 pages
Supplement Incident Report 11	6 pages
Supplement Incident Report 12	4 pages
Supplement Incident Report 13	4 pages
Supplement Incident Report 14	9 pages
Notice of Impoundment Report regarding 2017 Honda Accord Black VIN: 1HGCR3F89HA020370	1 page
EVIDENCE REPORTS	NUMBER
CCR#: 19-0762278	
JACKSONVILLE SHERIFF'S OFFICE	
Evidence Technician Report	2 pages
Evidence Technician Supplement 1	1 page
Evidence Technician Supplement 2	2 pages
Evidence Technician Supplement 3	2 pages
Evidence Technician Supplement 4	2 pages
Evidence Technician Supplement 5	2 pages
Evidence Technician Supplement 6	1 page
Evidence Technician Supplement 7	2 pages
Evidence Technician Supplement 8	4 pages
Evidence Technician Supplement 9	1 page
Evidence Technician Supplement 10	1 page
Evidence Technician Supplement 11	3 pages
Evidence Technician Supplement 12	2 pages
Evidence Technician Supplement 13	3 pages
Evidence Technician Supplement 14	3 pages
Evidence Technician Supplement 15	1 page
Evidence Technician Supplement 16	3 pages
Evidence Technician Supplement 17	1 page
PROPERTY STORAGE CARDS*	NUMBER
*All items listed on the property storage cards are available for inspection by the Defense with proper notice	

CCR#: 19-0762278	
JACKSONVILLE SHERIFF'S OFFICE	
Items 1-16 listed on Submission 949038 Seq. No. 1	3 pages
Items 1-18 listed on Submission 949054 Seq. No. 2	3 pages
Items 1-10 listed on Submission 949058 Seq. No. 3	2 pages
Items 1-7 listed on Submission 949069 Seq. No. 4	2 pages
Items 1-51 listed on Submission 949108 Seq. No. 5	6 pages
Item 1 listed on Submission 949166 Seq. No. 6	1 page
Items 1-3 listed on Submission 949170 Seq. No. 7	1 page
Items 1-2 listed on Submission 949202 Seq. No. 8	1 page
Item 1 listed on Submission 949248 Seq. No. 9	1 page
Items 1-2 listed on Submission 949340 Seq. No. 10	1 page
Items 1-8 listed on Submission 949473 Seq. No. 11	2 pages
Item 1 listed on Submission 949673 Seq. No. 12	1 page
Item 1 listed on Submission 949730 Seq. No. 13	1 page
Item 1 listed on Submission 949731 Seq. No. 14	1 page
Items 1-2 listed on Submission 949864 Seq. No. 15	1 page
Items 1-4 listed on Submission 950002 Seq. No. 16	1 page
Items 1-4 listed on Submission 950004 Seq. No. 17	1 page
Item 1 listed on Submission 950118 Seq. No. 18	1 page
Items 1-17 listed on Submission 950133 Seq. No. 19	3 pages
Items 1-6 listed on Submission 950154 Seq. No. 20	2 pages
Item 1 listed on Submission 950276 Seq. No. 21	1 page
Item 1 listed on Submission 950330 Seq. No. 22	1 page
Items 1-2 listed on Submission 950596 Seq. No. 23	1 page
Items 1-3 listed on Submission 950763 Seq. No. 24	1 page
Item 1 listed on Submission 950830 Seq. No. 25	1 page
Items 1-23 listed on Submission 951354 Seq. No. 26	3 pages
Items 1-18 listed on Submission 951510 Seq. No. 27	3 pages
Item 1 listed on Submission 951525 Seq. No. 28	1 page
Items 1-7 listed on Submission 951541 Seq. No. 29	2 pages
Item 1 listed on Submission 951556 Seq. No. 30	1 page
Items 1-45 listed on Submission 951622 Seq. No. 31	5 pages
Item 1 listed on Submission 951707 Seq. No. 32	1 page
Items 1-41 listed on Submission 951715 Seq. No. 33	5 pages
Items 1-3 listed on Submission 951717 Seq. No. 34	1 page
Item 1 listed on Submission 952284 Seq. No. 35	1 page
Item 1 listed on Submission 952692 Seq. No. 36	1 page
Items 1-5 listed on Submission 952710 Seq. No. 37	2 pages
Items 1-4 listed on Submission 953268 Seq. No. 38	1 page
Item 1 listed on Submission 953312 Seq. No. 39	1 page
Item 1 listed on Submission 955654 Seq. No. 40	1 page
Items 1-6 listed on Submission 955985 Seq. No. 41	1 page
Items 1-3 listed on Submission 957626 Seq. No. 42	1 page
DEMOPOLIS POLICE DEPARTMENT	
Items 1-9 listed on Evidence PMI Tracker dated November 21, 2019	3 pages
DEPARTMENT OF HOMELAND SECURITY	

Item 1—Honda Cláirion Radio listed on form No. 7757206	1 page
17th JUDICIAL DRUG TASK FORCE	
Items 1-2 listed on Property Receipt dated November 9, 2019	1 page
Items 1-9 listed on Property Receipt dated November 11, 2019	1 page
ALABAMA DEPARTMENT OF FORENSIC SCIENCES	
Items 1-3 listed under Medical Examiner Case Number 20MM00197	1 page
Laboratory Evidence Release Form listing Items 1F, 1H, and 1J in Medical Examiner Case Number 20MM00197	1 page
PHOTOGRAPHS	NUMBER
CCR#: 19-0762278	
Jacksonville Sheriff's Office Evidence Technician Photographs	1 file containing 3,840 photographs
Alabama Autopsy Photographs	1 file containing 128 photographs
Arrest & Booking Photograph: Brianna Williams	1 page
Photos Shown During Interview on November 14, 2019	6 pages
BODY WORN CAMERA FOOTAGE	NUMBER
CCR#: 19-0762278	
169 videos (disclosed with link to evidence.com)	1 email
911 CALLS AND SUPPORTING DOCUMENTS	NUMBER
CCR#: 19-0762278	
Certification of Business Records and attached CAD (Incident Recall) printout	102 pages
911 Calls (previously listed under DEFENDANT'S STATEMENTS)	1 file
SURVEILLANCE VIDEO	NUMBER
CCR#: 19-0762278	
ALABAMA	NUMBER
Vowell's Grocery Store, 625 Hwy 80, Demopolis, Alabama dated 11/2/2019	17 videos
Chevron, 510 Hwy 80, Demopolis, Alabama dated 11/2/2019	1 file with player
Texaco, 1316 Hwy 80, Demopolis, Alabama dated 11/2/2019	1 video
Parr's Car Wash, 1325 Hwy 80, Demopolis, Alabama dated 11/2/2019	2 videos
Vowell's Fresh Market	2 videos
Texaco, 14076 US Hwy 43, Linden Alabama	3 videos
Chevron, 2010 S. Main Street, Demopolis, Alabama	7 videos
Vowell Grocery Store Inside dated 10/22-29/2019	13 videos
Vowell Grocery Store Inside dated 10/28/2019	12 videos
Vowell Grocery Store Inside dated 10/28-31/2019	7 videos
Apartment Complex where Karissa Williams lives	12 videos
Beauty Depo Demopolis	1 file with player
Circle K, Troy, Alabama	9 videos

Shell, Tuscaloosa, Alabama	1 file with player
Stevens Tire, Dothan, Alabama	1 file with player
GEORGIA	NUMBER
Shell, 1720 Martin Luther King Drive, Atlanta Georgia	5 videos
QT, 2786 Chapel Hill Road, Douglas, Georgia dated 11/2/2019	1 file with player
FLORIDA	NUMBER
Navy Federal, 10480 Avenue Walk dated 11/1-11/3/2019	1 file with player
Scrubbles Car Wash, 5064 Weebers Crossing dated 11/4/2019	40 videos
Ron Sholes Firm, 4608 Norwood Avenue	29 videos
NAS Jax Gate dated 11/4/2019	2 videos
Walmart Surveillance	1 video
Bonos Surveillance dated 11/05/2019	6 videos
Navy Exchange	1 file with player
Navy Federal Credit Union dated 11/01/2019	1 file with player
Publix on Norwood dated 11/03/2019	6 videos
Goodwill dated 10/24/2019	7 videos
Circle K, Tallahassee	1 file with player
Tom Thumb Bonifay, Florida	1 video
TSU Springfield Downloads	4 videos
VARIOUS RECORDS FOR INDIVIDUALS	
CCR#: 19-0762278	
CELLULAR DEVICE DOWNLOADS	NUMBER
Karissa Williams	1 file
Toneisha Williams	1 file
Dorielle Sims	1 file
Wayne Boykin	1 file
Dalton Roberts	1 file
Brianna Williams Samsung, Apple iPhone	1 file
CELL PHONE RECORDS AND LOCATION DATA	NUMBER
AT&T Cell Phone Records for Wayne Boykin (205)531-2761	1 file
T-Mobile Cell Phone Records for Karissa Williams	1 file
Verizon Cell Phone Records for Brianna Williams	1 file
	NUMBER
Navy Medical Records encompassing birth to 2019	73 pages
Kinder Garden Attendance	2 pages
Navy Child and Youth Programs Registration	14 pages
BRIANNA SHONTAE WILLIAMS NAVY RECORDS	NUMBER
NAS Work Schedule	12 pages
Leave Request Form	3 pages

NAS Access Card Records for Brianna Williams November 7, 2018 to November 7, 2019	189 pages
DALTON ROBERTS	NUMBER
Work Schedule for October 21 through November 6, 2019	2 pages
GPS Data for work for October 21 through November 6, 2019	29 pages
VARIOUS RECORDS REGARDING INVOLVED LOCATIONS	
CCR #:19-0762278	
	NUMBER
Signed Lease Agreement	9 pages
Inspection Photographs from June 25, 2019	16 pages
Inspection Report Data	15 pages
IVY STREET	NUMBER
Screenshots of text messages from landlord	2 pages
Voicemail left by unknown person	1 clip
APPLICATION, SOCIAL MEDIA DOWNLOADS	
CCR #:19-0762278	
CRAIGSLIST	NUMBER
Ads posted by Brianna Williams on April 16, 2017; June 11, 2017; April 4, 2018; January 7, 2018; February 7, 2018; March 17, 2018; October 18, 2018; October 21, 2018; November 3, 2019; November 5, 2019	14 pages
AMAZON	NUMBER
Subscription Information for account associated with Brianna Williams (nfake432@gmail.com)	6 pages
Sign-In History for account associated with Brianna Williams (nfake432@gmail.com)	2 pages
Order History for account associated with Brianna Williams (nfake432@gmail.com)	11 pages
FANDANGO	NUMBER
Certification of Business Records and attached purchase transaction details for account associated with Brianna Williams (May 29, 2017 to November 5, 2019)	5 pages
LYFT	NUMBER
Records for an account associated with Brianna Williams	82 pages
GOOGLE CLOUD DATA	NUMBER
Records for an account associated with briannawms2010@gmail.com	1 file
MATCH.COM	NUMBER
Match Response	1 page
Exhibit A (Search Warrant)	4 pages
Exhibit B (Results)	41 pages
Email containing password to unlock Exhibit B	1 file
MISCELLANEOUS	NUMBER
CCR #:19-0762278	
CONSTITUTIONAL RIGHTS FORMS	
Constitutional Rights Form: Brianna Williams dated November 6, 2019	1 page
Constitutional Rights Form: Brianna Williams dated November 14, 2019	1 page
Constitutional Rights Form: Brianna Williams dated November 21, 2019	1 page

Holding / Interview Room Observation Form	1 page
RECEIPTS	
3904 McFarld Blvd. East, Tuscaloosa, Alabama dated October 31, 2019	1 page
Circle K located at 1491 Timberlane Road, Tallahassee, Florida dated November 3, 2019	1 page

- L. All items of evidence obtained, which are listed in police reports and or property submission / storage cards.
- M. The State of Florida has no material or information that has been provided by an informant at this time.

3.220(b)(4) Brady.

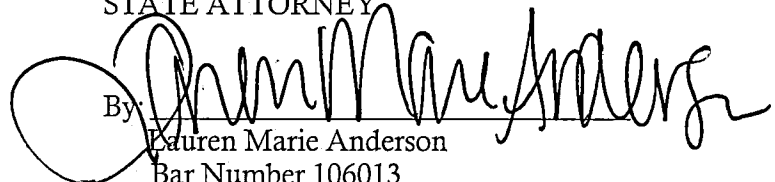
None known to the State at this time.

Defense may inspect, copy, test or photograph items contained in these paragraphs by appointment and proper notice to the undersigned Assistant State Attorney. This statement applies to any and all subsequent disclosures to the defense through the pendency of this case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy has been furnished by email to Joshua Beard, Office of the Public Defender, 407 North Laura Street, Jacksonville, Florida 32202, pd4duvalesrv@pd4.coj.net, this 28th day of January, 2020.

MELISSA W. NELSON
STATE ATTORNEY

By 
Lauren Marie Anderson
Bar Number 106013
Assistant State Attorney

e-Service Address
Primary: SAO4DuvalCriminal@coj.net